

DEPARTMENT OF THE NAVY

OFFICE OF THE ASSISTANT SECRETARY (INSTALLATIONS AND ENVIRONMENT) 1000 NAVY PENTAGON WASHINGTON, D.C. 20350-1000

Mr. Steven Geil
Project Manager, Metal Products and Machinery Rule
U.S. Environmental Protection Agency
Metal Products and Machinery Industry Survey
13908 Lee-Jackson Highway
Suite 1000
Chantilly, VA 20151-3202

Re: DOD SURVEYS ON THE METAL PRODUCTS AND MACHINERY

(MP&M)

INDUSTRY CATEGORY

Dear Mr. Geil:

Enclosed is a summary of DoD comments and the service responses to the Metal Products and Machinery (MP&M) surveys. This information is provided in response to the Environmental Protection Agency's (EPA) letter of 21 April 1998, Metal Products and Machinery Phase II Survey for Federal Facilities.

The military services took three different approaches in completing the MP&M survey. Navy selected twenty-two representative installations by industrial sector. For the sector specified (e.g., aircraft), the installation provided a summary of activities covered under the sector. Marine Corps elected to have five representative installations identify all MP&M activities on the installation and completed separate surveys for each activity covered by an industrial sector. Army and Air Force selected four and six representative installations respectively. Each installation submitted an aggregate survey of MP&M activities (specific installations were not identified). (*Note: An installation is defined as a collection of facilities. A facility may contain one or more MP&M activities.*)

A summary of the service responses is provided as enclosure (1). The actual surveys are provided as enclosure (2). We will be happy to discuss any questions you may have concerning the surveys. My point of contact is Ms. Maude Bullock, Office of the Chief of Naval Operations, (703) 602-1738, email: bullockm@n4.opoav.navy.mil.

Elsie L. MUNSELL

Deputy Assistant Secretary of the Navy (Environment and Safety)

Encl: (1) Summary of military service responses

(2) Surveys from Navy, Army, Air Force, and Marine Corps

Copy to: (w/o enclosures)
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SUMMARY OF DOD SERVICES' MP&M RESPONSES

A summary of the military services' surveys reveals the following:

- (1) The average volume of MP&M process wastewater discharged by the military services ranges from 2,485,199 to 28,202.923 gallons per year with the maximum discharge coming from Air Force industrial activities (Attachment 1).
- (2) Navy installations discharged from 0 to 14,965,000 gallons of MP&M process wastewater per year. The average discharge from those installations discharging wastewater is 2,485,199 gallons per year. The maximum MP&M process wastewater discharge was generated from the Stationary Industrial Equipment sector (Attachment 2).
- (3) Fifty percent of the Navy activities surveyed did not use or discharge water from their MP&M processes (Attachment 2).
- (4) Army installations discharge from 230,160 to 54,228,000 gallons of MP&M process wastewater per year with an average discharge of 19,959,728 gallons per year (Attachment 3). The sector generating the most wastewater cannot be identified from the installations surveyed.
- (5) Air Force installations discharge from 78,000 to 95,000,000 gallons of MP&M process wastewater per year with an average discharge of 28,202,923 gallons per year (Attachment 4). The sector generating the most wastewater cannot be identified

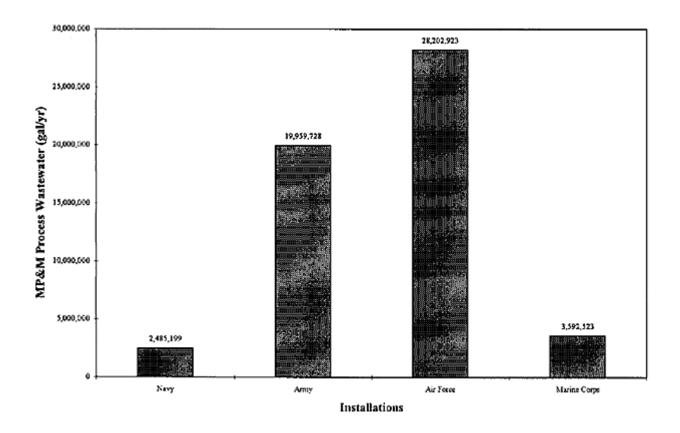
from the installations surveyed.

- (6) Marine Corps installations discharge from 56,979 to 13,319,365 gallons of MP&M process wastewater per year. The average discharge from those installations discharging wastewater is 3,592,523 gallons per year. The maximum MP&M process wastewater discharge was generated from the Ships and Boats sector (Attachment 5).
- (7) Fifty-five percent of the entities surveyed discharged their wastewater to a Federally Owned Treatment Works (FOTWs) or Industrial Wastewater Treatment Plant (IWTP) (Attachment 6).
- (8) Eighty-six percent of the entities surveyed performed "other" unit operations rather than the six major unit operations identified in the survey (Attachment 7).
- (9) Thirty-one percent of the entities surveyed have no wastewater treatment units and thirty-eight percent use an Oil Skimming/Chemical Emulsion Breaking wastewater treatment unit one of the ten choices identified in the survey (Attachment 8).
- (10) Forty-seven percent of the entities surveyed have no pollution prevention systems and thirty-four percent have pollution prevention systems other than the five major systems identified in the survey (Attachment 9).

Enclosure (1)

Attachment 1

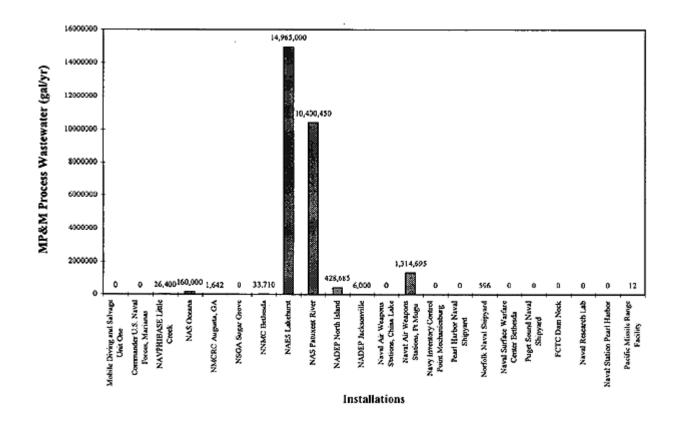
Average Volume of MP&M Process Wastewater Discharged by Services in 1996



Based on total of 37 representative installations: 22 Navy Installations, 4 Army Installations, 6 Air Force Installations, and 5 Marine Corps Installations

Enclosure (1)

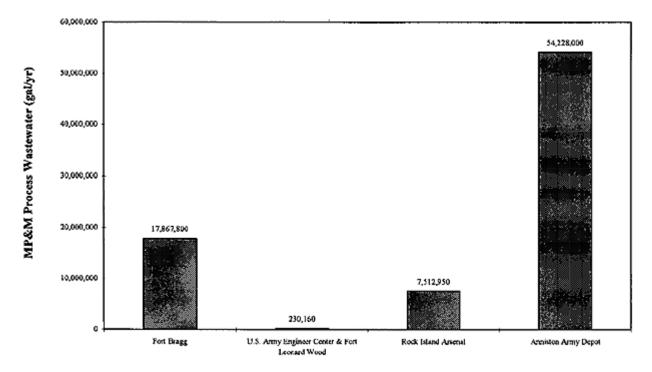
Attachment 2



Based on 22 representative Navy Installations (chosen for specific MP sector)
Three largest installation discharges under Stationary Industrial Equipment and aircraft sectors

Enclosure (1)

Attachment 3

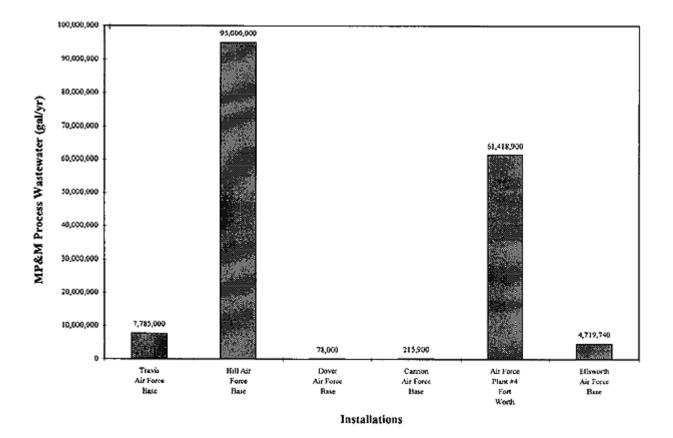


Installations

Based on 4 representative Army Installations

Enclosure (1)

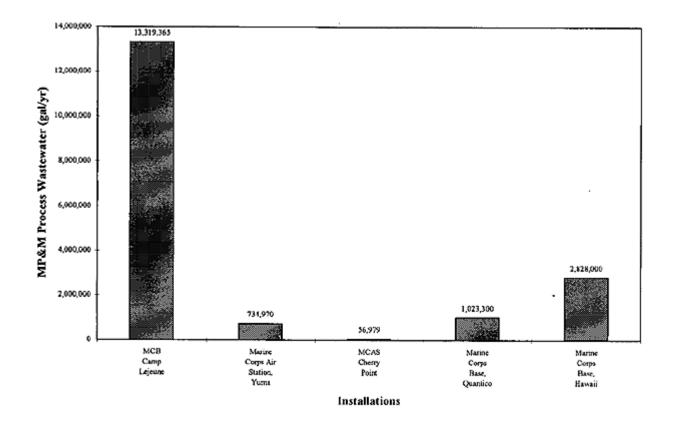
Attachment 4



Based on 6 representative Air Force Installations

Enclosure (1)

Attachment 5

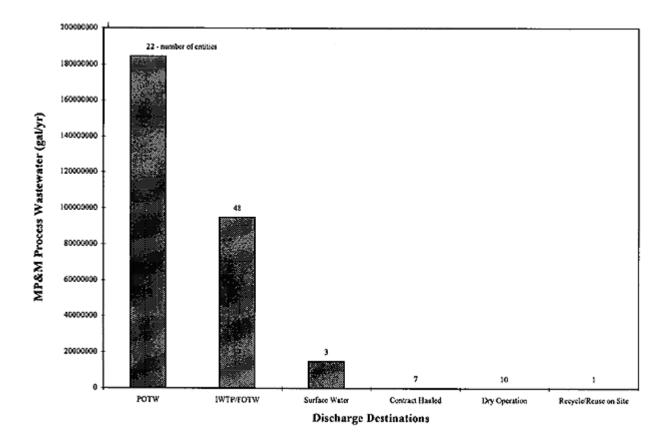


Based on 5 representative Marine Corps Installations (and 55 activities performed at these installations)

Enclosure (1)

Attachment 6

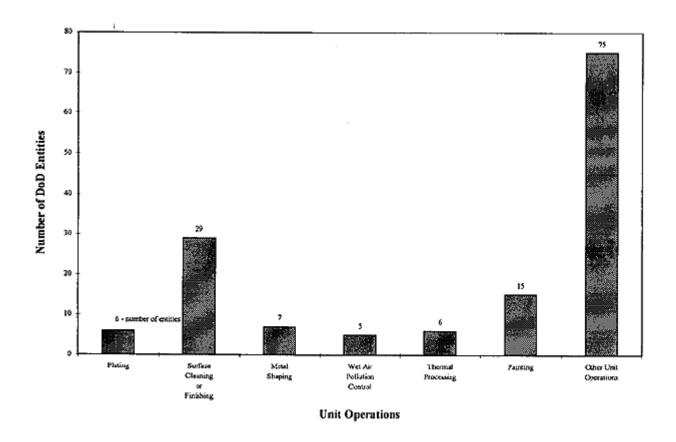
Total DoD Volume of MP&P Process Wastewater Discharged to Various Destinations



Enclosure (1)

Attachment 7

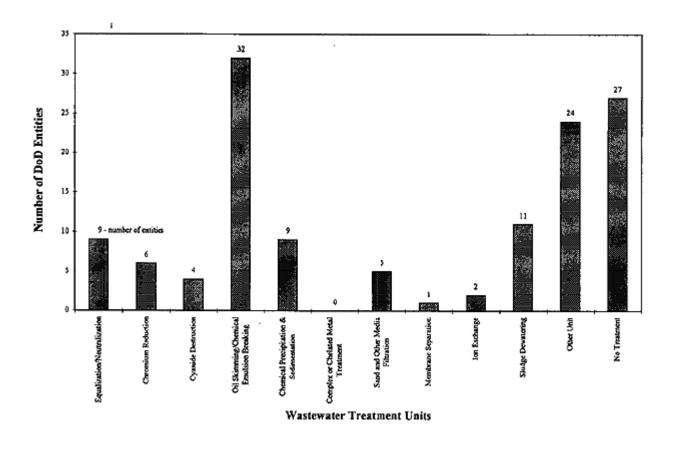
Number of Entities Performing MP&M Unit Operations



Enclosure (1)

Attachment 8

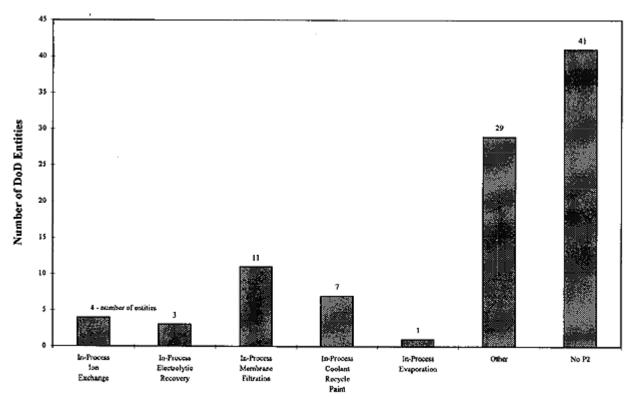
Number of DoD Entities With Wastewater Treatment Units



Enclosure (1)

Attachment 9

Number of DoD Entities With Pollution Prevention Systems



Pollution Prevention (P2) Systems

Enclosure (1)

					Pollution	Wastewater	MP&M WW
Installations	Federal entities surveyed		Discharged	Unit	Prevention	Treatment	Discharged
#		Sector	Destinations	Operations	Systems	Units	gal/yr
	NAVY INSTALLATIONS				NAVY INSTALLATIONS		
1	Mobile Driving and Salvage Unit One	Hardware	Dry operations	N/A	N/A	N/A	0
2	Commander U.S. Naval Forces, Marianas	Household Equipment	Contract Hauled	Surface Cleaning or Finishing	Other	None	0
				Other Unit Operations			
3	NAVPHIBASE Little Creek	Mobile Industrial Equipment	POTW	Surface Cleaning or Finishing	None	None	26,400
				Painting			
				Other Unit Operations			

4	NAS Oceana	Aircraft	POTW	Surface Cleaning or Finishing	None	None	160,000
				Other Unit Operations			
5	NMCRC Augusta, GA	Motor Vehicle	POTW, Surface Water	Surface Cleaning or Finishing	None	None	1,642
				Other Unit Operations			
6	NSGA Sugar Grove	Other Metal Products	Dry Operations	N/A	N/A	N/A	0
7	NNMC Bethesda	Instruments	POTW	Surface Cleaning or Finishing	In-Process Electrolytic Recovery	Equalization / Neutralization	33,710
				Other Unit Operations			
8	NAES Lakehurst	Stationary Industrial Equipment	Surface Water	Other Unit Operations	Other	Equalization / Neutralization	14,965,000
						Other Unit	
9	NAS Patuxent River	Aircraft	POTW	Surface Cleaning or Finishing	Other	Oil Skimming / Chemical Emulsion Breaking	10,400,450
				Thermal Processing			
10	NADEP North Island	Aircraft	IWTP / FOTW	Plating	In-Process Electrolytic Recovery	None	428,685
				Surface Cleaning or Finishing	In-Process Coolant Recycle & Paint Curtain Recycle		
				Metal Shaping	Other		
				Wet Air Pollution Control			
				Thermal Processing			
				Painting			
				Other Unit Operations			
11	NADEP Jacksonville	Aircraft	IWTP / FOTW	Plating	Other	Equalization / Neutralization	6,000
				Surface Cleaning or Finishing		Chromium Reduction	
				Metal Shaping		Cyanide Destruction	
				Thermal Processing		Oil Skimming / Chemical Emulsion Breaking	
				Painting		Chemical Precipitation & Sedimentation	
				Other Unit Operations		Sand and Other Media Filtration	
						Membrane Separation	
						Sludge Dewatering	
						Other Unit	
12	Naval Air Weapons Stations, China	Aircraft	Recycle / reuse on site	Other Unit Operations	Other	Other Unit	0

	Lake						
13	Naval Air Weapons Stations, Pt. Mugu	Aircraft	POTW	Surface Cleaning or Finishing	In-Process Electrolyte	Sludge Dewatering	1,314,695
				Wet Air Pollution Control	Other	Other Unit	
				Painting			
				Other Unit Operations			
14	Navy Inventory Control Point Mechanicsburg	Electronic Equipment	Contract Hauled	Surface Cleaning or Finishing	In-Process Coolant Recycle & Paint Curtain Recycle	Other Unit	0
				Metal Shaping			
				Thermal Processing			
				Painting			
				Other Unit Operations			
15	Pearl Harbor Naval Shipyard	Printed Circuit Boards	Dry Operations	N/A	N/A	N/A	0
16	Norfolk Navy Shipyard	Stationary Industrial Equipment	Contract Hauled	Other Unit Operations	None	None	596
17	Naval Surface Warfare Center Bethesda	Instruments	Dry Operations	N/A	N/A	N/A	0
18	Puget Sound Naval Shipyard	Railroad	Dry Operations	N/A	N/A	N/A	0
19	FCTC Dam Neck	Electronic Equipment	Dry Operations	N/A	N/A	N/A	0
20	Naval Research Lab	Electronic Equipment	Contract Hauled	Other Unit Operations	Other	None	0
21	Naval Station Pearl Harbor	Other Metal Products	Dry Operations	N/A	N/A	N/A	0
22	Pacific Missle Range Facility	Precious Metal and Jewelry	FOTW	Other Unit Operations	None	None	12
						TOTAL	27,337,192

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					Pollution	Wastewater	MP&M WW
Installations	Federal entities surveyed		Discharged	Unit	Prevention	Treatment	DISCHARGED
#		Sector	Destinations	Operations	Systems	Units	gal/yr
	ARMY INSTALLATIONS				ARMY INSTALLATIONS		

23	Fort Bragg	Indeterminable	IWTP/FOTW	Surface Cleaning or Finishing	None	Oil Skimming / Chemical Emulsion Breaking	17,867.800
				Other Unit Operations		Chemical Precipitation & Sedimentation	
						Sludge Dewatering	
						Other Unit	
24	U.S. Army Engineering Center & Fort Leonard Wood	Indeterminable	IWTP/FOTW	Surface Cleaning or Finishing	In-Process Coolant Recycle & Paint Curtain Recycle	Equalization / Neutralization	230,160
				Painting	In-Process Evaporation	Oil Skimming / Chemical Emulsion Breaking	
				Other Unit Operations		Sand and Other Media Filtration	
						Sludge Dewatering	
						Other Unit	
25	Rock Island Arsenal	Indeterminable	POTW	Plating	In-Process Coolant Recycle & Paint Curtain Recycle	Equalization / Neutralization	7,512,950
				Surface Cleaning or Finishing	Other	Chromium Reduction	
				Metal Shaping		Oil Skimming / Chemical Emulsion Breaking	
				Wet Air Pollution Control		Chemical Precipitation & Sedimentation	
				Painting		Sludge Dewatering	
				Other Unit Operations		Other Unit	
26	Anniston Army Depot	Indeterminable	IWTP/FOTW		None	Equalization / Neutralization	54,228,000
				Surface Cleaning or Finishing		Chromium Reduction	
				Wet Air Pollution Control		Cyanide Destruction	
				Painting		Oil Skimming / Chemical Emulsion Breaking	
				Other Unit Operations		Chemical Precipitation & Sedimentation	
						Sand and Other Media Filtration	
						Sludge Dewatering	

79,838,910	Total						
		AIR FORCE				AIR FORCE	
7.795.000		INSTALLATIONS	Distinct	DOTW		INSTALLATIONS Travis Air Force	27
7,785,000	None	None	Plating	POTW	Indeterminable	Base	27
			Surface Cleaning or Finishing				
			Painting				
			Other Unit Operations				
95,000,000	Equalization / Neutralization	In-Process Ion Exchange	Other Unit Operations	POTW	Indeterminable	Hill Air Force Base	28
	Chromium Reduction	In-Process Coolant Recycle & Paint Curtain Recycle	•				
	Cyanide Destruction	Other					
	Chemical Precipitation & Sedimentation						
	Sludge Dewatering						
	Other Unit						
78,000	Other Unit	Other	Surface Cleaning or Finishing	POTW	Indeterminable	Dover Air Force Base	29
			Metal Shaping				
			Thermal Processing				
			Painting				
			Other Unit Operations				
215,900	None	In-Process Ion Exchange	Surface Cleaning or Finishing	IWTP / FOTW	Indeterminable	Cannon Air Force Base	30
		In-Process Coolant Recycle & Paint Curtain Recycle	Painting				
		Other	Other Unit Operations				
61,418,900	Chromium Reduction	In-Process Coolant Recycle & Paint Curtain Recycle	Surface Cleaning or Finishing	IWTP / FOTW	Indeterminable	Air Force Plant #4 Fort Worth	31
	Oil Skimming / Chemical Emulsion Breaking	Other	Painting				
	Chemical Precipitation & Sedimentation						
	Ion Exchange						
	Sludge Dewatering						
	Other Unit						
4,719,740	Oil Skimming / Chemical	Other	Surface Cleaning or	IWTP / FOTW	Indeterminable	Ellsworth Air Force Base	32

			Finishing		Emulsion Breaking	
			Metal Shaping		Chemical Precipitation & Sedimentation	
			Other Unit Operations		Sludge Dewatering	
					Total	169,217,540
	MARINE CORPS INSTALLATIONS			MARINE CORPS INSTALLATIONS		
33	MCB Camp Lejeune					

					Pollution	Wastewater	MP&M WW
Installations	Federal entities surveyed		Discharged	Unit	Prevention	Treatment	DISCHARGED
#		Sector	Destinations	Operations	Systems	Units	gal/yr
	Activities in Installation						
	Dental Clinic	Other Metal Products	IWTP / FOTW	Other Unit Operations	In-Process Membrane Filtration	None	2,000
	Engineering Equipment Maintenance	Indeterminable	Contract Hauled	Other Unit Operations	None	None	145,000
	Dental Clinic	Other Metal Products	IWTP / FOTW	Other Unit Operations	In-Process Membrane Filtration	None	2,000
	Commercial Vehicle Maintenance	Indeterminable	IWTP / FOTW	N/A	Other	None	0
	Public Works Shop	Indeterminable	IWTP / FOTW	Painting	None	None	1,500
				Other Unit Operations			
	Fifth Baltalion Maintenance	Indeterminable	IWTP / FOTW	Other Unit Operations	Other	Oil Skimming / Chemical Emulsion Breaking	78,100
	Auto Vehicle Maintenance Shop	Indeterminable	IWTP / FOTW	Other Unit Operations	Other	Oil Skimming / Chemical Emulsion Breaking	1,885
	Steam Plant	Stationary Industrial Equipment	IWTP / FOTW	N/A	None	None	0

1,502,700	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Truck Company	
34,600	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Motor Trans	
336,980	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Motor Vehicle	Motor Trans	
120,300	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Motor Vehicle	Second Combat Eng. Bn.	
500	None	In-Process Membrane Filtration	Other Unit Operations	IWTP / FOTW	Other Metal Products	Dental Clinic	
40,000	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Maintenance	
0	None	Other	N/A	Dry Operations	Indeterminable	Base Satellite Maintenance	
2,400	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Fuel Farm	
4,800	None	In-Process Membrane Filtration	Other Unit Operations	IWTP / FOTW	Aircraft	Non Destructive Insp	
1,500,000	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Aircraft	Maintenance Hanger	
260,000	None	None	Other Unit Operations	IWTP / FOTW	Aircraft	Equipment Shop	
9,000	None	In-Process Membrane Filtration	Other Unit Operations	IWTP / FOTW	Aircraft	Steam Plant	
0	None	None	N/A	Dry Operations	Aircraft	Equipment Maintenance	
2,400	None	None	Other Unit Operations	IWTP / FOTW	Indeterminable	AC Direct Fuel Station	
1,500,000	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Maintenance 01 & 02	
0	None	None	N/A	Dry Operations	Aircraft	MALS 26	
1,458,000	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Auto Vehicle Maintenance Shop	
241,500	None	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Heavy Equipment Maintenance	
1,502,700	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Vehicle Maintenance	
463,500	Oil Skimming / Chemical Emulsion Breaking	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Vehicle Maintenance	
2,500	Oil Skimming / Chemical	None	Other Unit Operations	IWTP / FOTW	Indeterminable	Vehicle Maintenance	

						Emulsion Breaking	
	Vehicle Maintenance	Indeterminable	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	9,000
	Com Air Systems	Indeterminable	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	918,000
	Equipment Maintenance and Repair	Indeterminable	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	1,500
	Public Works Shop	Indeterminable	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	31,800
	Vehicle Maintenance	Indeterminable	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	44,100
	Dental Clinic	Other Metal Products	IWTP / FOTW	Other Unit Operations	In-Process Membrane Filtration	None	2,000
	Minor Repairs	Mobile Industrial Equipment	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	1,500
	Dental Clinic	Other Metal Products	IWTP / FOTW	Other Unit Operations	In-Process Membrane Filtration	None	200
	Vehicle Maintenance	Indeterminable	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	24,000
	Vehicle Training Facility	Motor Vehicle	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	7,200
	Dental Clinic	Other Metal Products	IWTP / FOTW	Other Unit Operations	In-Process Membrane Filtration	None	200
	Amphibious Vehicle Shop	Ships and Boats	IWTP / FOTW	Other Unit Operations	None	Oil Skimming / Chemical Emulsion Breaking	3,067,500
34	Marine Corps Air Station,						
	Yuma Activities In						
	Installation CSSD-16	Indeterminable	POTW	Surface Cleaning or Finishing	None	Other Unit	68,640
				Other Unit Operations			
	NWSS-371	Indeterminable	POTW	Surface Cleaning or Finishing	Membrane Filtration	Other Unit	211,440
				Other Unit Operations	Other		
	MALS-13	Indeterminable	POTW	Surface Cleaning or Finishing	In-Process Exchange	Ion Exchange	162,550
				Other Unit Operations	In-Process Membrane	Other Unit	

				Filtration		
				Other		
Station Motor Transport	Indeterminable	POTW	Surface Cleaning or Finishing	Other	Other Unit	117,360
			Other Unit Operations			
MWR Auto Hobby Shop	Indeterminable	POTW	Surface Cleaning or Finishing	Other	Other Unit	73,085
			Other Unit Operations			

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					Pollution	Wastewater	MP&M WWW
Installations	Federal entities surveyed		Discharged	Unit	Prevention	Treatment	DISCHARGED
#		Sector	Destinations	Operations	Systems	Units	gal/yr
	Station IMA	Indeterminable	POTW	Surface Cleaning or Finishing	Other	Other Unit	48,720
				Other Unit Operations			
	VMA-211 / - 214 / -311 / - 513	Indeterminable	POTW	Surface Cleaning or Finishing	In-Process Membrane Filtration	Other Unit	30,960
				Other Unit Operations	Other		
	Jet Engine Test Cell	Aircraft	POTW	Other Unit Operations	None	Other Unit	16,800
	VMFT-401	Indeterminable	POTW	Other Unit Operations	None	Other Unit	2,250
	Cannon Complex	Indeterminable	POTW	Other Unit Operations	Other	Other Unit	2,160
	FMD	Indeterminable	POTW	Other Unit Operations	None	Other Unit	1,005
35	MCAS Cherry Point	Indeterminable	FOTW	Plating	Other	Equalization / Neutralization	56,979
				Surface Cleaning or Finishing		Chromium Reduction	
				Metal Shaping		Cyanide Reduction	
				Wet Air Pollution Control		Oil Skimming / Chemical Emulsion Breaking	

				Operations		Total	17,962,614
				Painting Other Unit			
				Thermal Processing			
			Contract Hauled	Metal Shaping		Other Unit	
37	Marine Corps Base, Hawaii	Indeterminable		Surface Cleaning or Finishing	Other	Sludge Dewatering	2,828,000
						Other Unit	
						Sludge Dewatering	
			Contract Hauled			Sand and Other Media Filtration	
			Surface Water	Other Unit Operations		Chemical Precipitation & Sedimentation	
36	Marine Corps Base, Quantico	Indeterminable	FOTW	Surface Cleaning or Finishing	Other	Equalization / Neutralization	1,023,300
				Other Unit Operations		Other Unit	
				Painting		Sand and Other Media Filtration	
				Thermal Processing		Chemical Precipitation & Sedimentation	