



MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Robert L. Ehrlich, Jr.
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Michael S. Steele
Lt. Governor

Jonas A. Jacobson
Deputy Secretary

June 9, 2004

Mr. Walter Legg
Department of the Navy
Engineering Field Activity Chesapeake
Washington Navy Yard, Building 212
1314 Harwood Street SE
Washington D.C. 20374-5018

- RE: 1. **Draft-RCRA Facility Investigation for SWMU 87 Building 611 Solid Waste Storage Unit Former Naval Surface Warfare Center White Oak Silver Spring, Maryland March 2004 by TtNUS.**
- 2. **Draft-Corrective Measures Study for SWMU 87 Building 611 Solid Waste Storage Unit Former Naval Surface Warfare Center White Oak Silver Spring, Maryland March 2004 by TtNUS.**
- 3. **Draft-Work Plan for Pre-Design Investigation Enhanced In-Situ Bio-Remediation SWMU 87--Building 611 Solid Waste Storage Unit Former Naval Surface Warfare Center--White Oak Silver Spring, Maryland May 2004 by TtNUS.**

Dear Mr. Legg:

Enclosed are the Federal Facilities Division of the Maryland Department of the Environment's Waste Management Administration's comments on the above referenced documents.

If you have any questions, please contact me at (410) 537-3419.

Sincerely,

Andy Zarins
Remedial Project Manager
Federal Facilities Division

AZ:mh

Enclosure

cc: Mr. Bruce Beach
Mr. Horacio Tablada
Mr. Harold L. Dye, Jr.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION
HAZARDOUS WASTE PROGRAM
FEDERAL FACILITIES DIVISION**

Comments on:

1. **Draft--RCRA Facility Investigation for SWMU 87 Building 611 Solid Waste Storage Unit Former Naval Surface Warfare Center White Oak Silver Spring, Maryland March 2004 by TtNUS.**
2. **Draft--Corrective Measures Study for SWMU 87 Building 611 Solid Waste Storage Unit Former Naval Surface Warfare Center White Oak Silver Spring, Maryland March 2004 by TtNUS.**
3. **Draft--Work Plan for Pre-Design Investigation Enhanced In-Situ Bio-Remediation SWMU 87--Building 611 Solid Waste Storage Unit Former Naval Surface Warfare Center--White Oak Silver Spring, Maryland May 2004 by TtNUS.**

SPECIFIC COMMENTS

Document 1:

1. RFI report: Figure 2-1 is missing.
2. RFI report, Page 2-4, Section 2.1.4, 2nd ¶, 1st sentence: "Three surface and six subsurface soil samples were collected..." The location of these samples is not given. A map with these soil sample locations shown would be helpful.
3. RFI report, Page 3-3, Section 3.5, 2nd sentence: "Groundwater use in the area is limited to a few residential homes along the southeastern perimeter of the site." There is no map in this report showing the location of these residential wells relative to SWMU 87. If these wells are close enough to SWMU 87, please show their locations.
4. RFI report, Page 3-3, Section 3.6 2nd ¶: "Static water levels..." No groundwater potentiometric map was submitted. Please add a potentiometric map to this section, showing hydraulic gradients and the location of the 9 temporary wells.
5. RFI report: Appendix B has two identical sets of field data for SWMU 87.

Document 2:

1. CMS report, Figures 1-3 and 2-1: These figures have different locations for samples 87ss103, 87ss102, and 87ss101. Please show the correct locations for these samples.

2. CMS report, Page 2-7, Section 2.2.2: PCE is detected at a site maximum of 1,100 ug/l and TCE is detected at a site maximum of 17 ug/l in groundwater. However, Appendix A-2 and Figures 3-1 and 2-3 show PCE at a maximum concentration of 110 ug/l and TCE at a maximum concentration of 19 ug/l. Please correct the text and figures so there is no contradiction of these values within the report.
3. CMS report, Page 3-6, Section 3.3: Thallium is omitted from the COC table. Section 2.2.2 references thallium as exceeding screening values. Why is thallium not included in the COC table?
4. CMS report, Page 3-6, Section 3.4, Figure 3-1 and RFI report p.2-4, Section 2.1.4, 1st paragraph, last sentence: The VOC plume and the hypothetical source areas are described in the text and figure 3-1 shows the approximate extent and assumed location of the VOC plume. However, no plume isoconcentration map is included in the report and source areas are not delineated. In addition, the dashed lines of the plume infer an approximate location of the plume indicating that the extent of contamination is not known. Please correct the text and Figure 3-1 accordingly.
5. CMS report: Pages 3-1, 4-7, 4-8, 4-14, 4-20, and 5-7: CAOs, MCSs, PRBs, ZV, GAC, DPT, and AS are used initially as abbreviations and should be spelled out when used for the first time.

Document 3

1. Work Plan: No comments.