



STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway Baltimore, Maryland 21224
(410) 631-3438

William Donald Schaefer
Governor

Robert Perciasepe
Secretary

January 28, 1992

Mr. Kenneth D. Morin
Director, Utilities/Environmental Division
Department of the Navy
Naval Ordnance Station
Indian Head, MD 20640-5000

Re: Draft Report Engineering Evaluation and Cost Analysis
Mercury Contaminated Sediments, Nitroglycerin Plant Office

Dear Mr. Morin:

Enclosed are the State's comments on the referenced document that must be addressed prior to its finalization. Should you have any questions or comments, please call me at (410) 631-3438.

Sincerely,

A handwritten signature in cursive script that reads "Mark J. Schoppet".

Mark J. Schoppet
Remedial Project Manager
CERCLA Response Division

MJS:bjw

cc. Mr. Richard Collins
Mr. Frank Henderson

Enclosure

STATE OF MARYLAND COMMENTS
TO THE ENGINEERING EVALUATION AND COST ANALYSIS (EECA) REPORT
SITE 8 - NITROGLYCERIN PLANT OFFICE

General Comment

While the overall approach and the selected remedy appear to be acceptable, one issue must be resolved before this document may be finalized and released to the TRC. This document completely ignores the Ambient Water Quality Criteria (AWQC) which must be identified as ARARs. More importantly, it is not clear how the cleanup levels presented in Section 7 were determined. If these levels are based on EPA data, then this data must be either presented or adequately referenced. Until these levels are justified, the State cannot approve of this action.

Since this is classified as an interim removal action, it must be made clear that further study will be conducted to determine the extent of mercury contamination and to quantify the risks to human health and the environment associated with the site.

Specific Comments

1. Page 9, Figure 2-1:

Sampling Point SD-15 is missing.

2. Page 10, Table 2-1:

The accompanying figure (FIGURE 3 from the 1985 NEESA Study) is needed to show the locations of these samples.

3. Page 11 Table 2-2:

Column labels are not aligned.

4. Page 16, Table 2-4:

It is not clear how the mean concentration between Station 24+60 and 20+00 is 4.8 when the range of concentrations is between 3.4 and 4.1.

5. Page 20, First Paragraph:

The term "Level E Data" needs to be defined.

6. Page 43, Section 4:

The risks to fish and wildlife need to be evaluated.

EECA: Site 8, Page 3

7. Page 46, Section 5.0:

It is not clear how these target levels were determined. If EPA data was used to determine these levels, it must either be presented or adequately referenced.

8. Page 50, Table 5-2:

The Ambient Surface Water Quality Criteria for mercury in freshwater are 2.4 g/l (Acute) and 0.012 g/l (Chronic). These are ARARs and must be included here.

9. Page 60, First Line:

This sentence needs clarification.

10. Page 66, Section 7.0:

See Comment 7.

11. Page 116, Second Paragraph:

The term "hexqualent" should be hexavalent.