



MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

October 30, 1995

Mr. Shawn Jorgensen
Naval Surface Warfare Center
Indian Head Division
101 Strauss Avenue
Indian Head MD 20640-5035

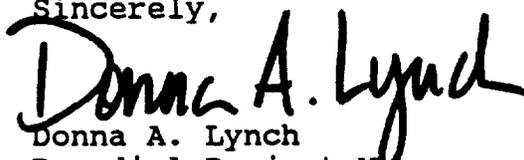
RE: No Further Action Decision Document for Site 8 - Nitroglycerin
Plant Office, Indian Head Division - Naval Surface Warfare
Center, October, 1995

Dear Mr. Jorgensen:

Enclosed are the Maryland Department of the Environment, Waste
Management Administration's comments on the above referenced document.

If you have any questions, please feel free to contact me or Mr. Kim
Lemaster at (410) 631-3440.

Sincerely,



Donna A. Lynch
Remedial Project Manager
Federal Facilities/NPL
Superfund Division

:dal

Enclosure

cc: Mr. Dennis Orenshaw, U.S. EPA
Mr. Shawn Phillips, U.S. Navy EFACHES
Mr. Richard Collins
Mr. Robert DeMarco
Ms. Hilary Miller

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION**

Comments on

No Further Action Decision Document for Site 8 - Nitroglycerin Plant Office.

Indian Head Division - Naval Surface Warfare Center, Brown and Root Environmental, October 1995

GENERAL COMMENTS

1. MDE is no longer the Lead Regulatory Agency on the Naval Surface Warfare Center at Indian Head, Maryland.
2. These comments are prepared with the understanding that the above referenced document is to be re-written into a Draft Proposed Plan after these comments are received. Therefore general comments include a reorganization of the document with the addition of sections not currently in the document and the removal and/or rewording of other sections as is appropriate for inclusion in a Proposed Plan document (i.e., a general outline for a Proposed Plan includes; Introduction, Site Background, Scope and Role of Response Action, Summary of Site Risks, Summary of Alternatives, Evaluation of Alternatives, Identification of the Preferred Alternative, and a section on Community Participation). Please keep in mind when re-writing the document that the general public is the intended audience for this Proposed Plan.

MDE concurs that the source area for Site 8 (the upper portion of the stream) has been addressed by the removal action but MDE does not concur that the Site 8 pond and groundwater have been addressed by the removal action.

SPECIFIC COMMENTS

1. Pg. 1-1, Section 1.2, under Site Description. Please include groundwater in the site description.
2. Pg. 1-4, Section 1.3, under Engineering Evaluation/Cost Analysis, 2nd sentence. Please indicate whether the risk assessment that was performed during the EE/CA process was adequate to address the risk posed to human health and the environment from the contamination of Site 8.
3. Pg. 1-5, Section 1.3, under Biomonitoring, 1st sentence. Earlier in the document it is stated that approximately 2 ½ years of quarterly biomonitoring were performed at the Site 8 pond. Please provide justification that this constitutes long-term biomonitoring for the impact of mercury on the environment.
4. Pg. 1-5, Section 1.3, under Biomonitoring, last sentence. The biomonitoring program focused on the pond associated with Site 8, thus the conclusions from this effort are applicable to the pond and do not pertain to the Site 8 stream. Please change this sentence to accurately reflect the results of the biomonitoring program.

Pg. 2-3, Section 2.2, under Surface Water. In the Site Characterization Study the results of testing

surface water for total and dissolved mercury can be found in Table 4-13 on page 4-25. It appears that the detection limit used was 0.20 ppb. The current Ambient Water Quality Criteria for mercury is 0.14 ppb to protect human health and 0.012 ppb to protect freshwater organisms from chronic effects. It appears that the analytical laboratory detection limit was not sensitive enough to meet the Ambient Water Quality Criteria level for mercury in the surface waters. Therefore the last sentence in this section can not be substantiated. Post-removal sampling of the surface water associated with this site will be necessary to determine whether the health-based benchmarks mentioned above are exceeded. Such information is a necessary consideration in determining the need for further action at this site.

6. Pg. 2-4, under Biomonitoring Summary. The last few rounds of quarterly biomonitoring included sampling for lead in addition to mercury. Please include a discussion and summary of these results.
7. Pg. 2-5, Section 2.4, 2nd and 3rd sentences. In addition to mercury, other metals have been identified in the Site 8 pond. Any evaluation of this pond must address these constituents along with mercury because other sources may be contributing contaminants to the Site 8 pond.
8. Pg. 3-3, Section 3.2. Ecological risks should be evaluated and accepted before the issuance of the Proposed Plan.
9. Pg. 3-3, 3rd and 4th sentences at top paragraph. See comment #5 above.
10. Pg. 3-5, last sentence in first paragraph. Site 8 did pose a risk to human health when the concrete pipe broke and elemental mercury was released. Please change this sentence.
11. Pg. 4-1, Section 4.0, ROD Requirements. This section fails to address many of the requirements for remedial response actions as stipulated in the NCP.
12. Pg. 5-1, 4th paragraph. MDE does not concur with this statement.