



MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

October 31, 1995

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

RE: Post-Removal Action Report for Site 8 - Nitroglycerin Plant
Office at Indian Head Division - Naval Surface Warfare Center,
April, 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,

A handwritten signature in black ink that reads "Donna A. Lynch".

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

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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

Post-Removal Action Report for Site 8 - Nitroglycerin Plant Office at
Indian Head Division - Naval Surface Warfare Center, Halliburton NUS, April 1995

GENERAL COMMENTS

1. Due to Indian Head being placed on the NPL, MDE is no longer the Lead Regulatory Agency on the Naval Surface Warfare Center at Indian Head, Maryland.

SPECIFIC COMMENTS

1. Pg. 1-1, under "Site 8 consists of the following:". Please add groundwater to the Site 8 description. Please indicate why the Site 8 description in this document includes 30 feet of tributary stream while other documents (i.e., No Further Action Decision Document for Site 8) do not include the tributary stream.
2. Pg. 2-4, under Clearing and Grubbing Section. On a recent site visit (October 19) with the Navy RPMs, EPA, and MDE it was noticed that a number of trees cleared were left near the access road. Why weren't these cleared trees cut?
3. Pg. 2-8, under Soil Backfilling and Regrading, 4th sentence. Please specify where the backfilled soil used to fill the stream was brought in from offsite.
4. Pg. 2-8, under Soil Backfilling and Regrading, 10th sentence. Please clarify whether compaction testing was performed after the fill was placed.
5. Pg. 2-8, under Section 2.4. No discussion is included in this section on the stream channel re-alignment yet Appendix E contains drawings (i.e., Sheets C-3 and C-5) showing that the channel re-alignment was not accomplished according to the original design drawings. Does the existing re-aligned channel minimize erosion due to the disturbance of the natural stream bed?
6. Pg. 2-9, under NOTE. Please indicate whether trees were planted on the banks of the reconstructed stream in the spring of 1995.
7. Pg. 2-10, under NOTE. On a recent site visit (October 19) to Building #606, where the mercury-contaminated soil was placed, it was noticed that the earthen berm around the building has been actively eroding away. Could this erosion problem be due to the nonuniform slope of the reconstructed berm? Please indicate what measures the Navy has or will take to control erosion of the earthen berm at Building #606. MDE considers adequate maintenance of the Building #606 berm to be a necessary component of the Removal Action for Site 8.

8. Pg. 4-1, last sentence on this page. As worded this sentence does not make sense.
9. Pg. 4-2, last sentence on this page. MDE does not concur with this statement. 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.