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MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

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Secretary

November 24, 1995

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

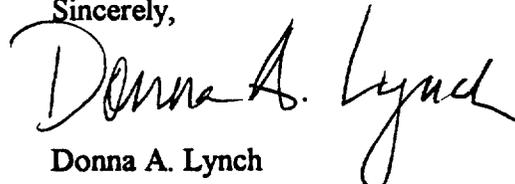
Re: Site Management Plan for Installation Restoration Program - Indian Head Division, Naval Surface Warfare Center, October, 1995

Dear Mr. Jorgensen:

Enclosed are the Maryland Department of the Environment, Waste Management Administration's (MDE/WAS) 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/NPL Superfund Division

DAL:bjm

Enclosure:

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

"Together We Can Clean Up"

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

Comments on

Site Management Plan for Installation Restoration Program - Indian Head Division, Naval Surface Warfare Center, Halliburton NUS Corporation, October 1995

GENERAL COMMENTS

1. MDE is no longer the Lead Regulatory Agency on the Naval Surface Warfare Center at Indian Head, Maryland because of the NPL status.
2. The Site Management Plan (SMP) will need to be integrated with the FFA objectives and scope. When the FFA objectives and scope are defined by the EPA, Navy and MDE the document will require revisions to reflect these changes. It is anticipated that the FFA scope of work may include the need to investigate areas/sites not yet identified by the Installation Restoration Program process.

SPECIFIC COMMENTS

1. Pg. ES-1, 5th pp., 1st sentence. Please change this sentence to reflect the current NPL status.
2. Pg. 1-1, Section 1.1, 5th sentence. Please take out the word 'proposed' from this sentence.
3. Pg. 1-3, 3rd pp., 6th sentence. Please clarify why Sites 6 and 25 depend upon the Site 5 investigation.
4. Figure 1-2. Please add a bullet with 'Risk Assessment' beside the RI/FS box on this figure.
5. Pg. 1-5, 1st sentence. Please clarify this sentence.
6. Pg. 1-5, paragraphs 2 and 3. Please review the subject paragraph for clarity and continuity.
7. Pg. 1-5, 1st pp., 4th sentence. Please clarify what is contributing to the heavy metals contamination at Site 12.
8. Pg. 1-5, 3rd pp., 3rd sentence. Please clarify this sentence.
9. Pg. 1-6, Sections 1.3 and 1.4. Would these Sections be more appropriate if they followed the Introduction on page 1-1?
10. Pg. 1-6, Section 1.4, 2nd sentence. Please change the words 'has presented' to the word 'presents'.
11. Pg. 1-6, Section 1.4, 5th sentence. Please change this sentence to read; 'All of the documents cited in this Site Management Plan are listed in the References section of this document'.

2. Pg. 1-7. Please indicate on this page that this is Figure 1-3.
13. Pg. 2-1, Section 2.1, 2nd pp., last sentence. Please verify whether thorium-contaminated soil is drummed and currently stored in Building #901.
14. Pg. 2-2, Section 2.2, 2nd pp., last sentence. This sentence addresses the potential for contaminant migration in the deeper aquifers but MDE does not agree that it explains contaminant migration in the surficial aquifer. What is being done to address the potential for contaminant migration in the surficial aquifer?
15. Pg. 2-3, 1st pp., last sentence. See comment #14.
16. Pg. 2-7, 1st pp., last sentence. See comment #14.
17. Pg. 2-10, Section 2.11, 3rd pp. MDE recommends addressing groundwater at Site 11 during the RI/FS due to the reported presence of spills, leaking drums, and leachate at the site by the NEESA team in 1983.
18. Pg. 2-12, 2nd pp. MDE recommends that groundwater be addressed during the RI/FS for Site 12.
19. Pg. 2-13, Section 2.15, 4th pp., last sentence. See comment #14.
20. Pg. 2-17, 1st pp., last sentence. See comment #14. MDE recommends that groundwater be addressed at Site 21 during the Site Screening Process.
21. Pg. 2-20, Section 2.27, 2nd sentence. Please clarify this sentence.
22. Pg. 2-24, Section 2.31. MDE recommends that groundwater be addressed in the RI/FS due to soil and sediment contamination by VOCs and SVOCs at Site 39.
23. Pg. 2-27, Section 2.35. MDE recommends that groundwater be addressed at Site 43 during the RI/FS.
24. Pg. 2-35, Section 2.41, last paragraph of this Section. The detection of VOCs and SVOCs in soil samples indicates the possibility of groundwater contamination. MDE recommends that groundwater be addressed during the Site Screening Process for Site 49.
25. Pg. 2-36, 4th pp. Please indicate that the background concentrations used to compare metals data for Site 50 were published data and not established during the Site Inspection.
26. Pg. 2-36, 5th pp. MDE recommends that groundwater be addressed in the RI/FS at Site 50 because VOCs were detected in the soil samples.
27. Pg. 2-38, 5th pp. Please summarize what the cation exchange capacity (CEC) and total organic carbon content (TOC) values indicate for Site 53.

28. Pg. 2-42, Section 2.47, 4th pp., 1st sentence. This sentence references Figure SMPA-56-1 which was not included in MDE's copy of the Site Management Plan.
29. Pg. 2-43, Section 2.48, 2nd pp., 1st sentence. TCE is also a contaminant of concern at Site 57.
30. Pg. 4-2, 3rd pp. Please delete the word 'for' from the first sentence of this paragraph.
31. Figures SMPA 5-2 and SMPA 8-1 reference tables which are not found in this document.
32. Appendix C is missing from MDE's copy of the Site Management Plan.