

The logo for the Maryland Department of the Environment (MDE) features a stylized landscape with a sun, mountains, and water, with the letters "MDE" prominently displayed below.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

July 3, 1996

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

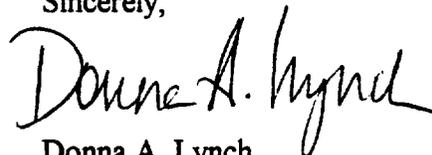
RE: Working Draft Project-Specific Remedial Investigation Work Plan, Naval Surface Warfare Center, Indian Head Division, Brown and Root Environmental, May 1996

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 contact me at (410) 631-3440.

Sincerely,

A handwritten signature in cursive script that reads "Donna A. Lynch".

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

Enclosure

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

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

Comments on

Working Draft Project-Specific Remedial Investigation Work Plan, Naval
Surface Warfare Center, Indian Head Division, Brown and Root Environmental, May 1996

GENERAL COMMENTS

1. In light of the many years of industrial activity at this facility, environmental samples should be analyzed for a complete target compound list (TCL) and target analyte list (TAL) scan at each Installation Restoration (IR) site. In addition, site-specific analytes, including explosives and their associated chemicals of concern, will need to be included on the list of analytical parameters at appropriately selected sites.
2. Please provide the Maryland Department of the Environment (MDE) with topographic maps of the IR sites.
3. Many sections of this Work Plan reference background levels when discussing previous sampling results for inorganics. The Phase 2 Site Inspection Report (May 1993) used average values or ranges of analytes from either the Eastern or Conterminous United States as background data. For the Remedial Investigation work, background or reference samples should be taken that will accurately reflect the background levels of analytes in the vicinity of the Naval Surface Warfare Center at Indian Head.

SPECIFIC COMMENTS

1. Page 2-1, Section 2.1, Section 2.1, third paragraph, last sentence. According to the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA, February 1989), disposal of arsenic wastes occurred at Site 12.
2. Page 2-1. Based on field visits to Site 12, MDE requests that the Navy consider investigating the treeless, flat area just north of this landfill.
3. Table 2-2. Please explain what is meant by a temporary groundwater well and the rationale for installing these temporary wells at Site 12.
4. Page 3-2, first paragraph. A discussion of the explosive derivatives detected in the sediment samples should be presented.
5. Tables 4-1 and 4-2. Although the Mattawoman Creek sediments are being addressed under Site 39 investigative work, Site 41 may also be contributing contaminated sediments to the Creek. MDE suggests that the Navy consider control features for sediment runoff from this Site into the Creek.

6. Table 6-2. Please provide the rationale for one groundwater sample to be taken. One groundwater sample does not seem adequate to assess groundwater contamination at this site.
7. Table 9-1. The statement "there is no indication that groundwater has been impacted" is unsubstantiated because groundwater has never been sampled or assessed at Site 46.
8. Page 9-2, Section 9.4 and Table 9-2. The Draft Final Site Inspection Report-Phase II (1993) recommended additional sampling of surface and subsurface soils to analyze for lead and cadmium. This Work Plan does not propose any further sampling at this Site. Please justify this discrepancy.
9. Page 10-1. Please explain how the soil sampling could have properly addressed contamination at this site since the concrete pad is still covering the area where the spent catalyst was poured onto the ground.
10. Table 10-2. See comment number 6.
11. Page 12-1, first paragraph. Can the Navy provide any information on what kinds of laboratory wastes were disposed at this site?
12. Page 12-1, first paragraph, sixth sentence. Of what material is the drain line fabricated?
13. Table 12-2. See comment number 6.
14. Table 13-2. See comment number 6.
15. Page 14-6, fourth paragraph. Please explain how the cation exchange capacity value and the total organic carbon content in soil borings at this site relate to contaminant migration in the subsurface.
16. Table 14-2. Please explain the rationale for sampling the production wells at this site. These wells are screened in the deeper aquifers and may assess whether the contamination has migrated to these depths, but will not address the potential contamination of the shallow aquifer.
17. Table 14-2. Is information on the condition of the sewer lines available from the video survey that was conducted in late 1988? If so, please explain the rationale for conducting another video survey of these sewer lines.
18. Page 17-2, last sentence. This sentence incorrectly states the purpose of the site 56 removal action. This removal action is being conducted to remove lead-contaminated sediments and not to remediate the surface waters.

