



MARYLAND DEPARTMENT OF THE ENVIRONMENT  
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Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

November 21, 1996

Mr. Shawn Jorgensen  
Naval Surface Warfare Center  
Indian Head Division  
Attn.: Code 046, Building D-327  
101 Strauss Avenue  
Indian Head MD 20640-5035

RE: Draft Engineering Evaluation/Cost Analysis for IR Site 57, Former Drum Loading Area, Building 292, Indian Head Division, Naval Surface Warfare Center, October 1996

Dear Mr. Jorgensen:

Enclosed please find 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 black ink that reads "Donna A. Lynch". The signature is written in a cursive, flowing style.

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

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:

Draft Engineering Evaluation/Cost Analysis for IR Site 57, Former Drum Loading Area,  
Building 292, Indian Head Division, Naval Surface Warfare Center,

Brown and Root Environmental, October 1996

**SPECIFIC COMMENTS**

1. Page 2-7, Section 2.4. The Maryland Department of the Environment (MDE) considers soil gas sampling to be a site screening process for determining whether contamination exists in an area. Once an area has been defined as contaminated based on soil gas results, then further delineation of the area should be accomplished with soil sampling. Based on the limited number of soil samples collected at Site 57, additional soil sampling should be conducted to define the endpoints of the contaminated area.
2. Page 3-11, Section 3.3, 2nd paragraph. The removal action objective for Site 57 has been set at 20 ug/kg of trichloroethene (TCE), the soil screening level for transfer from soil to groundwater from the U.S. Environmental Protection Agency (EPA) Region III's Risk-Based Concentration Table (Smith, April 1996). Soil gas concentrations cannot be correlated to the soil screening level. Therefore, soils will need to be sampled to verify whether the removal action objective of 20 ug/kg of TCE has been achieved.
3. Page 3-11, Section 3.4. Please clarify why the Indian Head facility would be subject to statutory limits for fund-financed removal actions per CERCLA 104(c)(1).