



MARYLAND DEPARTMENT OF THE ENVIRONMENT  
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December 16, 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 Master Plans for Remedial Investigations for Indian Head Division, Naval Surface Warfare Center, July 1996

Dear Mr. Jorgensen:

Enclosed are the Maryland Department of the Environment (MDE), Waste Management Administration's comments on the above referenced document. This document includes the following plans: Master Work Plan, Master Field Sampling Plan, Master Quality Assurance Project Plan, and Health and Safety Guidance Document. The MDE has no comments on the Health and Safety Guidance Document at this time.

Please feel free to contact me at (410) 631-3440.

Sincerely,

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

Enclosure

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

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

Comments on:

Draft Master Work Plan for Remedial Investigations for Indian Head Division, Naval  
Surface Warfare Center, Brown and Root Environmental, July 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 related compounds, should be included on the list of analytical parameters at appropriately selected sites.

**SPECIFIC COMMENTS**

1. Section 1.2, 1st paragraph and Figure 1-1. The description and figure of the Naval Surface Warfare Center includes the Stump Neck Annex. The Maryland Department of the Environment (MDE) was under the impression that the Stump Neck Annex portion of the facility is being addressed under the Resource Conservation and Recovery Act (RCRA) Corrective Action Program. Please clarify whether or not the Stump Neck Annex is being addressed under the RCRA Corrective Action Program.
2. Page 2-10, Section 2.8.4. Please note that there is no Code of Maryland Regulations (COMAR) 8.07.08.
3. Page 3-7, 2nd paragraph, 3rd sentence. Please provide the rationale for using a lead screening level of 2,000 mg/kg for soils and sediments. The methodology used to determine this screening level for potential human health concerns at this industrial site should be described. A similar discussion should be included to address potential ecological concerns. For example, the National Oceanic and Atmospheric Administration (NOAA) screening guideline for lead in marine sediments is 46.7 parts per million (effects range-low). Please provide justification that 2,000 mg/kg is an appropriate screening level for lead in fresh water sediments.
4. Page 3-7, 4th paragraph. The Navy should consider conducting a statistically valid evaluation of local background conditions. The data from this study would be valuable for comparison of site-related contaminants to naturally occurring levels.
5. Page 3-8, Section 3.1.3, 3rd paragraph, 2nd sentence. Please explain what actions will be taken if a contaminant concentration in soil exceeds the Soil Screening Levels for transfer from soil to groundwater.

6. Page 6-4, last paragraph. The Naval Surface Warfare Center, a National Priorities List (NPL) facility, is exempt from the administrative aspects of a permit for on-site activities that are conducted as part of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process. However, the substantive requirements of a permit should be accomplished while the facility is following the CERCLA process.
7. Page 6-6, last paragraph and Table 6-1. The direct transfer of contaminants from one media to another is not allowed during remedial actions.
8. Page 6-10, 1st paragraph, last sentence. This section of the Master Work Plan addresses the possibility that future remediation activities will include the management of soils that have been contaminated with listed hazardous waste constituents. In such a case, the soil is considered a natural media that must be managed as a hazardous waste due to the presence of the listed constituent. The MDE does not consider the soil to be a hazardous waste, but the presence of listed hazardous waste constituent(s) will necessitate RCRA waste management practices.

The U.S. Environmental Protection Agency (EPA) Region III has determined that such media may be reused at the site following treatment that reduces the concentrations of listed constituents below health-based benchmarks in accordance with the EPA's "contained-in" policy. It should be noted that the MDE's Hazardous Waste Program, which is authorized by the EPA RCRA Program, has not recognized the EPA's "contained-in" policy. Therefore, the MDE does **not** consider the treatment of such media sufficient to alleviate the RCRA land ban restrictions and allow the media to be replaced on the site. Rather, the MDE requires that the treated media be administratively delisted by the EPA prior to its replacement on the site. The delisting procedure may be documented in the CERCLA Record of Decision for the action or in some other documentation determined to be appropriate by the EPA and MDE. After the delisting procedure is complete, the media, which was never considered to be a solid waste, may be reused on the site.

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

Comments on:

Draft Master Field Sampling Plan, Naval Surface Warfare Center, Indian Head  
Division, Brown and Root Environmental, July 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.

**SPECIFIC COMMENTS**

1. Page 1-1, 1st paragraph, last sentence. Please clarify that Federal laws and regulations, or Maryland laws and regulations which are more stringent than Federal laws and regulations, will be Applicable or Relevant and Appropriate Requirements (ARARs) for actions taken at this National Priorities List (NPL) facility.
2. Page 2-4, Section 2.2.3, 1st paragraph. Please note that any direct push equipment utilized to explore for groundwater must be operated by a driller licensed in the State of Maryland as per Code of Maryland Regulations (COMAR) 26.04.04.03 and 26.05.01.
3. Page 2-20, Section 2.11. This section discusses the management of investigatory derived media (IDM) that are expected to be generated during the Remedial Investigation (RI) planned for the Indian Head facility. The RI will be conducted to gather sufficient information and data to support a risk assessment and the development and evaluation of remedial options. Field activities in many areas of known contamination will be conducted during the RI.

The practices described in this section of the Master Field Sampling Plan are applicable to the Site Inspection (SI) phase of the CERCLA process, as evidenced by the reference to the U.S. EPA guidance document Management of Investigation-Derived Wastes During Site Inspections (OERR Directive 9345.3-02, May 1991). The RI constitutes a more rigorous investigation of the site than does the SI. In fact, the U.S. EPA states in the above referenced guidance, "The limited scope and purpose of the SI activity is not intended to address contamination at a particular site (other than to gather information about it)." (OERR Directive 9345.3-02, May 1991, p. 19).

Furthermore, the same guidance states, "The efforts made to characterize IDW (investigatory derived wastes) should be consistent with the limited scope and purpose of an SI. In most cases, the limited scope of an SI makes it impracticable to characterize wastes to the same extent that might be done in a remedial investigation/feasibility study

(RI/FS)." (OERR Directive 9345.3-02, May 1991), p. 13). It is important to realize that it may be entirely appropriate to have RI/FS requirements which differ from the SI requirements.

Investigatory derived media (IDM) describes the groundwater, surface water, soils and sediments that are collected during field activities to support the RI/FS. Specifically, IDM may include development and purge water from monitoring wells, drill cuttings, and extra soils removed during sample collections. To evaluate whether the IDM must be managed as hazardous waste, the preliminary inquiry is whether the IDM is a solid waste, as defined in Maryland's Environment Article, §7-201(t) and COMAR 26.13.02.02. Basically, uncontaminated IDM need not be considered a solid waste, as long as that IDM: 1) will not be abandoned in an environmentally unsound manner; and 2) is not inherently waste-like. IDM with contamination should be viewed as inherently waste-like unless or until the media is no longer contaminated, or is treated or recycled.

Because the IDM originates from a Superfund site, there must be some initial evaluation as to whether it is contaminated or inherently waste-like. As guidance, IDM must be handled as a solid waste when:

- 1) It is visually or grossly contaminated;
- 2) It has activated any field monitoring device indicating the presence of volatile organic compounds (VOC) or metals;
- 3) On previous monitoring/sampling activity, it has exhibited levels of contamination above accepted environmental quality standards;
- 4) Based on historical information, the responsible party or the regulatory agency believes it warrants caution or additional testing.

As with any solid waste, the generator must perform a hazardous waste determination. If the waste is hazardous, then it must be disposed of through an appropriate hazardous waste disposal facility. If the waste is not a hazardous waste, then that IDM may be disposed of through any permitted or authorized waste management facility willing to accept the waste, or recycled or reused in a manner permissible under the law.

Naturally occurring media which does not exhibit any of the characteristics or concerns described above need not be managed as a waste, particularly if the material will be returned to a suitable location on the facility. Unless otherwise specified, the handling or disposition of this material must be performed in such a manner, so that potential impacts to the environment are avoided. The Navy must comply with all pertinent sediment and erosion control regulations. Also, seeding and the judicious discharge of non-contaminated water to ensure infiltration will be considered the minimum steps necessary to ensure non-degradation of the environment.

4. Page 2-20, section 2.11, 2nd paragraph, 1st sentence. See comment #1.
5. Page 2-26, 1st paragraph. See comment #1.

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

Comments on:

Draft Master Quality Assurance Project Plan, Naval Surface Warfare Center,  
Indian Head Division, Brown and Root Environmental, July 1996

**SPECIFIC COMMENTS**

1. Page 1-3, Table 1-1. Many of the contract required detection limits (CRDL) for both aqueous and solid samples have higher values than the screening levels that the Navy proposes to use in the Remedial Investigation (RI) work. The detection limits should be compatible with the objectives of the RI.
2. Page 2-1, Section 2.0. The area code for the Indian Head point of contact is incorrect.
3. Page 3-1, Section 3.0. This section should include a discussion of quality assurance objectives for measuring explosive-related compounds because these compounds will be included in the analyses of media at most of the RI sites.
4. Page 6-1 and 6-2, Sections 6.2.1, 6.2.2, and 6.2.3. These sections should include a discussion of the calibration troubleshooting measures.
5. Page 7-1, Section 7.0. This section should include a discussion of the analytical and measurement procedures for explosive-related compounds because these compounds will be included in the analyses of media at most of the RI sites.
6. Page 7-3, Table 7-1. See comment #1.