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MDE

MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

December 29, 1997

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 Final Engineering Evaluation/Cost Analysis for Site 57, Former Drum Loading Area, Building 292, Naval Surface Warfare Center, Indian Head Division, October 1997

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,

Donna A. Lynch

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

Enclosure

cc: Mr. Brent Meredith, EFACHES
Mr. Dennis Orenshaw, U.S. EPA
Mr. Rob Sadorra, EFACHES
Mr. Richard Collins
Ms. Shari Wilson

MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION

Comments on:

Draft Final Engineering Evaluation/Cost Analysis for Site 57, Former Drum Loading Area, Building 292, Indian Head Division, Naval Surface Warfare Center, October 1997

GENERAL COMMENT

The Maryland Department of the Environment (MDE) suggests that the scope of this Engineering Evaluation/Cost Analysis should not include an evaluation of natural attenuation of the groundwater at Site 57. Natural attenuation of the groundwater would be more appropriately evaluated during the feasibility study stage of the project.

SPECIFIC COMMENTS

1. Page 1-5, Section 1.8, 1st bullet. Please provide a figure locating the three upstream sampling points.

2. Page 1-17, Section 1.10.2, 2nd paragraph. It is difficult to make conclusions on the extent of the groundwater plume based on two groundwater samples. MDE suggests that the Navy conduct a remedial investigation to define the groundwater plume boundaries before making conclusions on the extent of the plume.

3. Page 1-17, Section 1.10.2. The groundwater plume should be defined based on the detection of contaminants in the groundwater and not by the detection of contaminants above the Maximum Contaminant Levels. The Maximum Contaminant Levels or non-zero Maximum Contaminant Level Goals are cleanup goals for the final remedial action.

4. Page 2-1, Section 2.1, 1st paragraph, 3rd sentence. Please note that the U.S. Environmental Protection Agency (EPA) Region III Risk-Based Concentrations (RBCs) do not address the cumulative effects of multiple contaminants. EPA Region III guidance, *Selecting Exposure Routes and Contaminants of Concern by Risk-Based Screening* (January 1993), describes the adjustment made to the RBCs when dealing with multiple contaminants.

5. Page 2-9, Table 2-2. The Code of Maryland Regulations (COMAR) citation 26.09 is incorrect. The correct citation for erosion and sediment control is COMAR Title 26, Subtitle 17.

6. Page 2-10, Table 2-2. The COMAR citation 08.05.03 is incorrect. The correct citation for nontidal wetlands is COMAR Title 26, Subtitle 23.

7. Page 2-11, Section 2.3 and Appendix A. The remedial action cleanup goals should be determined after the remedial investigation is completed.

8. Page 2-14, Section 2.6. See comments #2 and #3.

9. Page 3-11, last paragraph. Natural attenuation cannot explain the presence of tetrachloroethene (PCE) at Site 57 where it is believed that trichloroethene (TCE) was released. Have efforts been made to identify other upgradient sources of PCE?

10. Page 3-11, last paragraph, last sentence. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Section 121(b)(1) details the preference for remedial actions in which the volume, toxicity or mobility of contaminants are permanently and significantly reduced. Groundwater is a natural resource which the State expects to be restored to its beneficial use within a timeframe that is reasonable given the particular circumstances of the site. State of Maryland groundwater policies are codified in Title 9, Subtitle 3, Water Pollution Control, Sections 9-302 and 9-322 and Title 4, Subtitle 4, Water Pollution Control and Abatement, Section 4-402 of the Annotated Code of Maryland. These groundwater policies prohibit waste discharge into any State waters without treatment or corrective action and require the abatement and control of existing pollution. Additionally, the State expects source mitigation to be part of the remedial action at this site.

11. Page 4-7, Section 4.3, 2nd paragraph, last sentence. In the case of soils contaminated with spent TCE at this site, the soil is considered a natural media that must be managed as a hazardous waste due to the presence of the listed constituent. EPA's "contained-in" policy addresses such media. However, it should be noted that the MDE's Hazardous Waste Program has not adopted the EPA's "contained-in" policy. Therefore, the MDE does not consider the treatment of such media sufficient to alleviate the Resource Conservation and Recovery Act 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 EPA prior to its reuse on the site.

12. Page 5-2, Section 5.3. Please note that the Navy is not subject to the $2 million statutory limit for fund-financed removal actions under CERCLA.