



**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

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Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

August 2, 1999

Mr. Shawn Jorgensen  
Environmental Engineer  
Department of the Navy  
Indian Head Division, Naval Surface Warfare Center  
Environmental Management Office (DEH-EMO)  
Indian Head MD 20640-5035

RE: Remedial Investigation Report for RI Site 57. Former Drum Disposal Area. Building 292.  
Volume I and II, June 1999

Dear Mr. Jorgensen:

Enclosed are comments from the Maryland Department of the Environment, Waste Management Administration on the above-referenced document.

If you have any questions, please contact me at (410) 631-3791.

Sincerely,

Curtis DeTore  
Remedial Project Manager  
Federal/NPL Superfund Division

CD:bjm

Enclosure

cc: Mr. Dennis Orenshaw  
Mr. Robert Sadorra  
Mr. Richard Collins  
Ms. Amanda Sigillito

**Maryland Department of the Environment**  
**Waste Management Administration**  
**Environmental Restoration and Redevelopment Program**  
Comments on:  
Remedial Investigation Report for RI Site 57, Former  
Drum Disposal Area, Building 292, Volume I and II,  
June 1999

**Specific Comments**

1. Section 1.4, page 1-2, first paragraph, ninth sentence  
This sentence should be revised to read "Section 8.0 describes the fate and...."
2. Section 1.4, page 1-2, first paragraph, eleventh sentence  
This sentence should be revised to read "Section 11.0 summarizes the preceding...."
3. Section 3.7.2, page 3-5, first paragraph, third sentence  
Please remove the second reference to gulls from this sentence.
4. Section 3.7.2, page 3-5, first paragraph, fourth sentence  
Please remove the reference to skunks from this sentence. as they are not reptiles or amphibians. Insert skunks into the sentence listing common mammals.
5. Section 6.0, Figure 6-1  
The figure should be revised to show groundwater moving in the direction of PW-7 as indicated in the text.
6. Section 6.22, page 6-3, first paragraph, first sentence  
This sentence should be revised to read "...surface map (Figure 6-1) that was...."
7. Section 6.2.4, page 6-4, first paragraph, second sentence  
This sentence should be revised to read "...as shown on Figure 6-1."
8. Section 7.0, Figure 7-3  
The references to PW-6 on this figure should be changed to PW-7.
9. Section 9.1.2, page 9-6, second complete paragraph, seventh sentence  
Please remove this sentence. It has been repeated in this paragraph.
10. Section 9.2.1, page 9-13, first complete paragraph, fourth sentence  
This sentence should be revised to read "...also included in Table 9-7."
11. Section 9.4.3, page 9-34  
This page is included twice in the draft copy. Please correct this oversight in the final revision.

12. Section 10.1.6, page 10-5, second bulleted point  
The term pelagic refers to free-swimming organisms, both plant and animal, within the water column in the open ocean. Since Mattawoman Creek is not the open ocean, this point should be revised to read planktonic communities.
13. Section 10.1.6, page 10-5, second complete paragraph, first sentence  
This sentence should be revised to read "For fish, aquatic vegetation, and planktonic communities, the...." See comment number 12 for more information.
14. Section 11.2, page 11-4, paragraph number eight  
This paragraph indicates that trichloroethene (TCE) was detected at a concentration of 7.2 parts per billion (ppb) in the sample collected from PW-7. This concentration exceeds the maximum contaminant level of 5 ppb. Please include a discussion on the current status of PW-7, its condition and uses, and what is being done to ensure compliance with the State and Federal regulations regarding potable water.

Based on the groundwater contouring on Figure 6-1, it is not geologically obvious that the groundwater present at Site 57 could migrate to PW-7. The Waste Management Administration believes that the groundwater flow pattern in this area needs to be investigated in greater detail to fully characterize the source of the TCE contamination found in PW-7.

**EFACHES – Comments**  
Draft RI Site 57 Report

1. Figure 1-3: Continue the storm sewer drawing to the creek
2. There was an earlier comment from the RAB that the use of "Phase 1 and 2" in this document was confused with a Phase 1 or 2 type study. Recommend changing the use of the word "Phase".
3. Has the use of background as an initial screen been accepted by EPA and MDE on other studies?
4. I expected to see more modeling of the groundwater data to better illustrate the plume.
5. Page 11-2: The use of the term "deep groundwater" may be confused with the deeper aquifers.