



## MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Parris N. Glendening  
Governor

Jane T. Ni  
Secr

March 6, 2001

Shawn Jorgensen, Environmental Engineer  
Indian Head Division  
Naval Surface Warfare Center  
ATTN: Code 046C, Bldg. D-327  
101 Strauss Avenue  
Indian Head, MD 20640-5035

Re: Proposed Plan for Site 12 – Town Gut Landfill, Indian Head Division, Naval Surface Warfare Center, Indian Head, Maryland, January 2001

Dear Mr. Jorgensen:

The Maryland Department of the Environment, Waste Management Administration (MDE/WAS) has completed its review of the above referenced document. This document describes the Navy's proposal to install a soil cover on Site 12, which is a former disposal area in the restricted area of the Indian Head Division, Naval Surface Warfare Center. The Navy is conducting this action in compliance with the Comprehensive Environmental Response, Compensation and Liability Act.

The Proposed action, which would mitigate exposure of waste to human and ecological receptors, includes a variance to the State's landfill closure requirements for sanitary landfills. The MDE/WAS has determined that the proposed action achieves a level of protection equivalent to the State's landfill closure regulations (COMAR 26.04.07.21). Consequently, in accordance with the variance of COMAR 26.04.07.21, the Navy's request for a variance is granted.

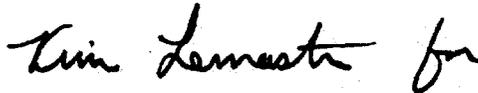
The Navy may wish to consider the addition of a layer of high or low permeability that could act as a hydraulic break for capillary water in the soil column. This layer would prevent the mercury, PCBs and other pollutants known to be present from being drawn to the surface and concentrated at the top of the soil column due to evaporative concentration of dissolved pollutants. This is particularly important consideration where low lying sites will be capped with fine-grained soils. The small pores in the soil have relatively high capillary draw-up, and the

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presence of shallow water in contact with waste can allow wicking of soluble contaminants to occur at a much larger percentage of the time than in upland sites.

As you are aware, MDE does not provide final concurrence on remedial actions until evaluating the comments received during the public comment period. If you have any questions, please contact me at (410) 631-3791.

Sincerely,



Curtis DeTore  
Remedial Project Manager  
Federal/NPL Superfund Division

cc: Mr. Richard W. Collins  
Mr. Edward Dexter  
Mr. Karl Kalbacher  
Mr. Dennis Orenshaw  
Mr. Jeff Morris