



**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

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Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

July 16, 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: 65% Remedial Action Design Submittal for Site 12 - Town Gut Landfill, Indian Head Division, NSWC, May 2001

Dear Mr. Jorgensen:

The Federal Facilities Section of the Maryland Department of the Environment has reviewed the above-referenced document. This document was forwarded to the Water Management Administration's Non-Point Source Control Division and the Non-Tidal Wetland and Waterways Division. Comments from these Divisions are enclosed.

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

Sincerely,

Curtis DeTore  
Remedial Project Manager  
Federal/NPL Superfund Division

Enclosure

cc: Mr. Richard Collins  
Mr. Karl Kalbacher  
Ms. Hilary Miller  
Mr. Jeff Morris  
Mr. Dennis Orenshaw

**MEMORANDUM**

RECEIVED

ER.

DATE: July 2, 2001  
TO: Curtis Detore WAS/ERRP  
FROM: Jim Tracy, WMA Sediment and Stormwater Plan Review Div.  
RE: Indian Head - Site 12

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As requested, WMA has reviewed the referenced project with regard to Erosion/Sediment Control and stormwater management. The review has generated the following comments:

**Stormwater Management**

1. Because the hydraulics/hydrology will not be changed by this project, stormwater management may be waived. An MDE Waiver Application should be submitted, requesting a 2.3 (a)(2) waiver.

**Sediment Control**

2. Sheet C-2: Please address the following:
  - a. On the North Site, the Silt Fence (SF) shown along the east Limit of Disturbance (LOD), south of the Decontamination Pad, is placed on a slope. This will not filter the runoff, but instead will act as a diversion. Additionally, as shown, clean water will also flow against the SF from outside the LOD. By checking the proposed contours on subsequent sheets, it appears that this segment of SF may not be necessary. If a 'barrier' is deemed desirable, or in fact necessary at this location, consider a diversion fence (detail attached).
  - b. On the South Site, the SF shown along the northeast LOD, is placed on a slope. This will not filter the runoff, but instead will act as a diversion. Additionally, as shown, clean water will also flow against a portion of the SF from outside the LOD. Please consider use of a diversion fence or a diversion dike at this location.
  - c. On the South Site, the SF shown along the southeast LOD, is placed on a slope. This will not filter the runoff, but instead will act as a diversion. Please consider use of a diversion fence or a diversion dike at this location.
  - d. On the South Site, please provide SF adjacent to both sides of the Stabilized Construction Entrance (SCE).
  - e. Interim and final contour should be shown on the Erosion/Sediment Control Plan, otherwise it is difficult to determine if and where the erosion/sediment control devices are appropriate.

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3. Sheet C-3: Please address the following:

- a. In the "Erosion and Sediment Control Notes", at each reference to the 'ROICC', please add ..'and MDE' (six places).
- b. In "Erosion and Sediment Control Notes", No.2, please add (following MDE) ..'at (410) 631-3510.
- c. In "Erosion and Sediment Control Notes", please add MDE Standard note regarding Miss Utility Notification (copy attached).
- d. In "Erosion and Sediment Control Notes", No.22, please add ... "Off-Site Borrow/Disposal Location".
- e. Include the Standard MDE "Owner/Developer Certification" and "Standard Stabilization Note".
- f. In the "Sequence of Construction", No. 1, after 'approved by', add... "MDE and".
- g. In the "Sequence of Construction", No. 5, after 'meeting with', add... "MDE and".
- h. In the "Sequence of Construction", No. 5, after '-Silt Fence along the', add... "toe of".
- i. In the "Sequence of Construction", No. 6 and No.7, the 'Stabilized Construction Entrances' are already installed per No. 5.
- j. In the "Sequence of Construction", No. 8 is unclear.
- k. In the "Sequence of Construction", No. 18, at the beginning, please add... "With the approval of the MDE Inspector," and following 'the Contracting Officer', please add... "and with the approval of the MDE Inspector,".
- l. Please show, on the plans, the 'construction laydown areas' and 'materials storage' and 'staging areas' referenced in No. 6 of the "Sequence of Construction".

4. Sheet C-4: Please address the following:

- a. In the "Temporary Seeding Summary", the 'Application Rate' for Annual Rye Grass is "50 lbs/acre". The 'Seeding Dates' are "2/1 - 4/30 and 8/15 - 11/1".
- b. In the "Temporary Seeding Summary", 'Cereal (Winter) Rye' is non-standard MDE species.
- c. In the "Permanent Seeding Summary", all species listed are MDE non-standard. Additionally, MDE Standard Fertilizer is (10-20-20).

5. Sheet C-5: Please address the following:

- a. Include the "Construction Specifications" in the 'Silt Fence' and 'Super Silt Fence' Details.
- b. In the 'Super Silt Fence Detail', specify Class F for the geotextile.

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- c. In the 'Silt Fence Detail', specify Class F for the geotextile. Also, the correct minimum embedment depth is 8-inches.
  - d. In the 'Stabilized Construction Entrance Detail', specify Class C for the geotextile.
  - e. In the 'Portable Sediment Tank Detail', Note 1, after 'ROICC', add '..'and MDE'.
6. Sheet C-5: On the South Site, east side (south of Atkins Road Extension), the proposed contour tie-ins between '10' and '15' need to be corrected.

Please contact me at 3566 if you have any questions of need additional info.

June 18, 2001

**MEMO**

**To:** Curtis DaTore

**From:** Judy B-Cole *JBC*

**Re:** Indian Head NSWC Landfill Cover Wetland Issues

I have read the information that you provided and I feel that it adequately provides for no net loss of acreage and/or function per the requirements of the Nontidal Wetlands Protection Act of 1989. In general, we treat impacts to pond margins as temporary because, under normal circumstances, they revegetate by themselves.

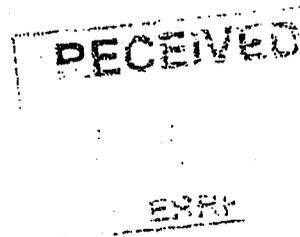
However, I have attached a copy of our best management practices for your information. As you will note, these BMP's require that fescues, such as K-31 not be used for stabilization within the wetlands and their regulated buffers. Stabilization with perennial fescues, per the standard notes on a sediment and erosion plan, precludes the establishment of native wetland species. Stabilization with annual species is acceptable because they will provide adequate temporary vegetative cover until native species regenerate.

I have also attached a copy of our approved rectification plan for temporary impacts to wetlands. You may also find it useful.

Please contact me if I can provide you with any additional assistance.

Phone: 410-414-3400  
Email: jcole@toad.net

Attachments



**BEST MANAGEMENT PRACTICES FOR WORKING IN NONTIDAL WETLANDS  
AND THEIR REGULATED BUFFERS**

- 1) No excess fill, construction material, or debris are to be stockpiled or stored in the wetlands or buffer.
- 2) Place materials in a location and manner which does not adversely impact surface or subsurface water flow into or out of the nontidal wetland.
- 3) Do not use the excavated material as backfill if it contains waste metal products, unsightly debris, toxic material or any other deleterious substance. If additional backfill is required, use clean material free of waste metal products, unsightly debris, toxic material or any other deleterious substance.
- 4) Place heavy equipment on mats or suitably operate the equipment to prevent damage to the nontidal wetlands or buffer.
- 5) Repair and maintain any serviceable structure or fill so there is no permanent loss of nontidal wetlands in excess of nontidal wetlands lost under the original structure or fill.
- 6) Rectify any nontidal wetlands temporarily impacted by any construction.
- 7) All stabilization in the wetland and buffer shall be of the following recommended species: Annual Ryegrass (Lolium multiflorum), Millet (Setaria italica), Barley (Hordeum sp.), Oats (Avena sp.), and/or Rye (Secale cereale). These species will allow for the stabilization of the site while also allowing for the voluntary revegetation of natural wetland species. Other non-persistent vegetation may be acceptable, but must be approved by the Division. Kentucky 31 fescue shall not be utilized in the wetland or buffer areas. The area should be seeded and mulched to reduce erosion after construction activities have been completed.
- 8) After installation has been completed, make post construction grades and elevations of nontidal wetlands the same as the original grades and elevations in temporarily impacted areas.
- 9) To protect important aquatic species, in-stream work is prohibited as determined by the classification of the stream as follows: Class I waters- in stream work may not be conducted during the period of March 1 through June 15, inclusive, during any year.
- 10) Stormwater runoff from impervious surfaces shall be controlled to prevent the washing of debris into the waterway.
- 11) Culvert(s) shall be constructed and any riprap placed so as not to obstruct the movement of aquatic species, unless the purpose of the activity is to impound water.

## APPROVED RECTIFICATION PLAN

- 1) The rectification plan shall contain provisions to ensure no loss of acreage.
- 2) Wetland functions shall be rectified by planting locally indigenous species as specified in the rectification standards.
- 3) The areas of temporary impact shall be managed to allow for the reversion of wetland acreage and function.

### Standards for Rectification Plan

- 1) Grading
  - a) The original grades and elevations in all regulated areas shall be restored at the completion of construction activities.
  - b) The first 6" of topsoil shall be stripped and stockpiled separately during grading activities, then replaced to achieve final grade.
  - c) Do not use the excavated material as backfill if it contains waste metal products, unsightly debris, toxic material or any other deleterious substance. If additional backfill is required, use clean material free of waste metal products, unsightly debris, toxic material or any other deleterious substance.
2. Stabilization
  - a) Disturbed areas shall be stabilized with a native seed mix suitable for the existing hydrologic regime of the site.
  - b) Disturbed areas shall be stabilized within 7 days of the completion of construction activities.
  - c) Disturbed areas shall not be stabilized with Kentucky 31 fescue.
3. Re-vegetation
  - a) Disturbed woody areas shall be re-vegetated with a native species composition which replicates pre-construction site conditions.
    - (1) Woody areas shall be planted at a rate of 436 stems per acre.
    - (2) Woody areas shall be planted with containerized plants.
    - (3) Woody areas shall be planted with species obtained from locally grown stock.
  - b) Disturbed emergent areas may be planted with a native species composition which replicates pre-construction site conditions.
    - (1) Emergent areas may be planted at a rate of 43,560 plants per acre.
    - (2) Emergent areas shall be planted with species obtained from locally grown stock.
  - c) Not more than a 15 foot wide area over any utility right-of-way shall remain unvegetated. Areas greater than 15 feet wide that are not replanted shall be regulated as areas of permanent disturbance and mitigation/compensation at the appropriate ratios shall be required.
4. Maintenance
  - a) Rectified areas shall be managed to allow for the reversion of wetland acreage and function.
  - b) Rectified areas shall not be mowed, chemically treated, or otherwise manipulated so as to prevent re-generation of previous site conditions.