



**RESPONSES TO  
MDE'S JULY 16, 2001 COMMENTS  
65% REMEDIAL ACTION DESIGN SUBMISSION  
SITE 12 TOWN GUT LANDFILL  
IHDIV-NSWC, INDIAN HEAD, MARYLAND**

**Stormwater Management**

Comment 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.

Response: TtNUS judges that an MDE Waiver Application is applicable based on the 65% Design Submission. However, the final design grades will be altered for the 100% Design Submission to the extent that permanent channels will need to be constructed along the eastern side of the northern disposal area and along the eastern side of the southern disposal area. The final design grades were altered to provide storage volume for the 1,350 cy of soil that was previously to be managed off-site as was reflected in the 65% Design Submission.

**Sediment Control**

Comment 2a. Sheet C-2: 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). [detail not provided]

Response: The locations of the silt and super silt fence around the entire perimeter of the landfill have been reviewed as a result of altering the proposed final grades to provide additional storage space (see Response to Comment 1). At the location identified in this comment, the silt fence will be replaced with a permanent diversion channel with rock check dams (rock check dams to be removed following final stabilization acceptance).

Comment 2b. Sheet C-2: 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.

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Response: The locations of the silt and super silt fence around the entire perimeter of the landfill have been reviewed as a result of altering the proposed final grades to provide additional storage space (see Response to Comment 1). At the location identified in this comment, the silt fence will be replaced with a permanent diversion channel with rock check dams (rock check dams will be removed following final stabilization acceptance).

Comment 2c. Sheet C-2: 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.

Response: It is agreed that silt fence is not required in this area based on the grading presented in the 65% Design Submission. Currently TtNUS is revising the final grades for the 100% Design as discussed in Response to Comment 1. Upon completion of the final grades, TtNUS will review the need for erosion and sediment control measures in this area.

Comment 2d. Sheet C-2: On the South Site, please provide SF adjacent to both sides of the Stabilized Stone Construction Entrance.

Response: Silt fence will be added to both sides of the stabilized stone construction entrance.

Comment 2e. Sheet C-2: 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.

Response: The final elevation contours will be added to Drawing No. C-2 "Erosion and Sediment Control Plan." TtNUS judges that the drawing will be overly "busy" if the interim elevation contours are provided.

Comment 3a. Sheet C-3: In the "Erosion and Sediment Control Notes", at each reference to the 'ROICC', please add '..'and MDE' (six places).

Response: The Erosion and Sediment Control Notes will be revised.

Comment 3b. Sheet C-3: In "Erosion and Sediment Control Notes", No. 2, please add (following MDE) '..'at (410) 631-3510.

Response: The Erosion and Sediment Control Notes will be revised.

Comment 3c. Sheet C-3: In "Erosion and Sediment Control Notes", please add MDE Standard note regarding Miss Utility Notification (copy attached). [not provided]

Response: A reference to Miss Utility is provided on Drawing No. T-2 General Note 14. General Note 14 states the following:

"The Contractor will provide maximum protection for existing utilities which are to remain in service. The Contractor will provide all temporary services. The

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Contractor will contact "MISS UTILITY" at (800) 257-7777 prior to intrusive activities. The Contractor will also contact the ROICC at (to be determined at pre-construction meeting) to arrange for location of the Base utilities. Verification of the utility locations must be made prior to any construction."

Comment 3d. Sheet C-3: In "Erosion and Sediment Control Notes", No. 22, please add ... "Off-Site Borrow/Disposal Location".

Response: The Contractor is responsible for selecting the off-site disposal facility and borrow source(s) subject to the requirements of the Specifications and approval of the ROICC. Disposal facility requirements are provided in Specification Section 02223 "Transportation and Disposal of Contaminated Material" and borrow source and soil composition requirements are provided in Specification Section 02223 "Excavation and Fill" and 02951 "Mitigated Wetlands Area, Shrubs, Plants, and Grass".

Comment 3e. Sheet C-3: Include the Standard MDE "Owner/Developer Certification" and "Standard Stabilization Note".

Response: The "Owner/Developer Certification" and "Standard Stabilization Note" will be added to Drawing No. C-3. However, TtNUS performed a review of the 2000 Maryland Stormwater Design Manual and the 1994 Maryland Standards and Specifications for Erosion and Sediment Controls Handbook, and was unable to locate text described as the Standard Stabilization Note. Therefore, TtNUS developed a note that captures the intent of the stabilization text in the above mentioned references. The note reads as follows:

"Final stabilization of all disturbed areas shall be approved by the ROICC and MDE before erosion and sediment controls are removed."

Comment 3f. Sheet C-3: In the "Sequence of Construction", No. 1, after 'approved by', add... "MDE and".

Response: The Sequence of Construction will be revised.

Comment 3g. Sheet C-3: In the "Sequence of Construction", No. 5, after 'meeting with', add... "MDE and".

Response: The Sequence of Construction will be revised.

Comment 3h. Sheet C-3: In the "Sequence of Construction", No. 5, after '-Silt fence along the', add... "toe of".

Response: The Sequence of Construction will be revised.

Comment 3i. Sheet C-3: In the "Sequence of Construction", No. 6 and No. 7, the 'Stabilized Construction Entrances' are already installed per No. 5.

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Response: Sequence of Construction item no. 5 describes preparatory work required prior to installation of perimeter controls whereas Sequence of Construction item nos. 6 and 7 describe installation of the perimeter controls.

Comment 3j. Sheet C-3: In the "Sequence of Construction", No. 8 is unclear.

Response: Sequence of Construction item no. 8 will be revised to reflect clearing and grubbing of all areas within the limit of disturbance.

Comment 3k. Sheet C-3: 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,".

Response: The Sequence of Construction will be revised.

Comment 3l. Sheet C-3: Please show, on the plans, the 'construction laydown areas' and 'materials storage' and 'staging areas' referenced in No. 6 of the "Sequence of Construction".

Response: The Contractor is responsible for selecting the locations of the construction laydown and materials storage and staging areas subject to approval of the ROICC. TtNUS's assumed locations for the construction laydown and materials storage and staging areas will be added to Drawing C-2.

Comment 4a. Sheet C-4: 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".

Response: The Temporary Seeding Summary will be revised.

Comment 4b. Sheet C-4: In the "Temporary Seeding Summary", 'Cereal (Winter) Rye' is non-standard MDE species.

Response: Cereal (Winter) Rye will be removed from the Temporary Seeding Summary. Because the 1994 Maryland Standards and Specifications for Soil Erosion and Sediment Control indicates in Specification G20, Section II "Temporary Seeding" that only one species is required for temporary seed mixtures, Annual Rye Grass will remain the only species on the Temporary Seeding Summary presented on Drawing No. C-4.

Comment 4c. Sheet C-4: In the "Permanent Seeding Summary", all species listed are MDE non-standard. Additionally, MDE Standard Fertilizer is (10-20-20).

Response: TtNUS is aware that the permanent seed mixture provided is not one of the standard mixes presented in the 1994 Maryland Standards and Specifications for Soil Erosion and Sediment Control. While the MDE standard mixes provide rapid, effective stabilization, all rely on fescues (*Festuca* sp.) and other aggressive plant species that slow natural succession and discourage the establishment of other plants of better value as food and cover for wildlife. The permanent seeding mixture proposed in the 65%

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Design Submission was custom-designed for sites at other nearby Navy installations undergoing environmental remediation. It includes a balance of species that provide effective stabilization, provide good food and cover for wildlife, and do not discourage natural succession. Therefore TtNUS does not plan to revise the permanent seed mixture.

The fertilizer composition will be revised.

Comment 5a. Sheet C-5: Include the "Construction Specifications" in the 'Silt Fence' and 'Super Silt Fence' Details.

Response: Portions of the Silt and Super Silt Fence specifications are provided in the Erosion and Sediment Control Notes on Drawing C-3. Therefore, only summarized specifications will be provided for the noted details.

Comment 5b. Sheet C-5: In the 'Super Silt Fence Detail', specify Class F for the geotextile.

Response: The detail will be revised.

Comment 5c. Sheet C-5: In the 'Silt Fence Detail', specify Class F for the geotextile. Also, the correct minimum embedment depth is 8-inches

Response: The detail will be revised.

Comment 5d. Sheet C-5: In the 'Stabilized Construction Entrance Detail', specify Class C for the geotextile.

Response: The detail will be revised.

Comment 5e. Sheet C-5: In the 'Portable Sediment Tank Detail', Note 1, after 'ROICC', add... 'and MDE'.

Response: The note will be revised.

Comment 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.

Response: The drawing will be revised.

Comment 7. Drawing No. C-4 commentor's notation regarding specifications for seeding mixture.

Response: The drawing will be revised.

Comment 8. Standards for Rectification Plan

Response: The 65% Remedial Design is consistent with the standards.

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Comment 9. Best Management Practices For Working In Nontidal Wetlands And Their Regulated Buffers

Response: The 65% Remedial Design is consistent with these guidelines, with one exception: Item 3.b.1 recommends that emergent wetland areas be planted at a rate of 43,560 plants per acre, which corresponds to spacing plants on 1-foot centers. The 65% Remedial Design calls for spacing plants on 2-foot centers. However, the plants selected for the design are fast growers that should provide good cover within one growing season when planted on 2-foot centers.