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LETTER FROM U S NAVY REGARDING REMOVAL ACTION AT SITE 41 NSWC INDIAN
HEAD MD
6/27/2002
NAVFAC CHESAPEAKE

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DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY CHESAPEAKE
1314 HARWOOD STREET SE
WASHINGTON NAVY YARD DC 20374-5018

IN REPLY REFER TO:

27 June 2002

ACTION MEMORANDUM

From: Manager, Installation Restoration Program, Engineering Field Activity Chesapeake,
Naval Facilities Engineering Command

To: Commanding Officer, NSWC Indian Head Division, Indian Head, Maryland

Subj: REMOVAL ACTION AT SITE 41, SCRAP YARD

Encl: (1) Engineering Evaluation Cost Analysis (EE/CA), Site 41 – Scrap Yard

1. PURPOSE

This action memorandum describes a non-time critical removal action being undertaken at Site 41 – Scrap Yard, NSWC Indian Head Division, Indian Head, Maryland, under the authority of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 40 CFR 300.415, and applicable provisions of the National Contingency Plan (NCP) and the Federal Facility Agreement. The removal action consists of soil removal and decontamination of the concrete pad. A disagreement between the Department of Defense and the U. S. Environmental Protection Agency (EPA) over post-ROD (Record of Decision) requirements with respect to institutional controls has delayed the signing of the ROD. The Navy, EPA, and the Maryland Department of the Environment agree that the ROD dispute should not impede the protection of human health and the environment. The final remedy will be implemented upon reaching a mutually acceptable agreement on Land Use Controls between MDE, EPA and the Navy.

2. SITE DESCRIPTION

a. Facility Description

The Indian Head Division Naval Surface Warfare Center (IHDIV-NSWC) is located in northwestern Charles County, Maryland, approximately 25 miles southwest of Washington, DC. The IHDIV-NSWC is a military facility consisting of the main area on the Cornwallis Neck Peninsula and the Annex on Stump Neck. The main area is bounded by the Potomac River to the northwest, west, and south, Mattawoman Creek to the south and east, and the town of Indian Head to the northeast. Stump Neck Annex is located across Mattawoman Creek.

b. Background of Site 41– Scrap Yard

Site 41 is located along the Mattawoman Creek just upstream from the Site 39 outfall. Initially, the site was the location of a coal storage facility dating from the turn of the century. From the

1960s to 1988, electrical transformers were stored at the northwestern end of Site 41 prior to off-site disposal. Following an inspection conducted in 1981, 17 transformers were identified as either polychlorinated biphenyl (PCB)-contaminated or PCB-containing (NEESA, 1992). These transformers were believed to have leaked and contaminated the soil in this portion of Site 41. Additionally, lead batteries were stored in the Site 41 scrap yard and may have released lead to the surface soils (E/A&H, 1994). Runoff from Site 41 flows southwest, into Mattawoman Creek.

c. Physical Setting

The scrap yard is a fenced area located in the southeastern portion of the Activity adjacent to Mattawoman Creek. The site is approximately 750 feet long and 75 to 100 feet wide. The area is flat and surface runoff tends to pond and infiltrate, although, in some sections, runoff is towards the creek. A concrete pad is present within most of the fenced area; however, the pad is buried under soil in many places. Site 41 also includes a vegetated area surrounding the fenced portion, which includes abandoned railroad tracks and a gravel roadway.

d. Current Use

Site 41 is an active scrap yard, although the past practice of storing scrap materials directly on the concrete pad has been replaced by the use of dumpsters for the receipt of all scrap metal. The materials are eventually sold to be recycled or reused.

e. Status

This site is currently under the Navy Installation Restoration (IR) Program and a Federal Facility Agreement. Site 41 has been under investigation since 1981, when NEESA identified the presence of PCB-contaminated or PCB-containing transformers during a Preliminary Assessment (PA) of the IHDIIV-NSWC facility. IHDIIV-NSWC was placed on the National Priorities List (NPL) in September 1995.

A remedial investigation (RI) was performed at Site 41 in 1997. The investigation included a geophysical investigation, installation of soil borings and shallow groundwater monitoring wells, and collection and analysis of surface soil, shallow groundwater, surface water, and sediment samples.

The feasibility study (FS) presented a description of the site history, identified remedial action objectives, screened remedial action alternative technologies, established remediation goals for shallow groundwater and soil, and recommended a course of action for the remedial action. The removal action consists of soil removal and decontamination of the concrete pad.

Due to the above-mentioned dispute pertaining to institutional controls, the Activity has decided to execute a removal action in lieu of a remedial action. The information gathered in the RI/FS has been incorporated by reference into an Engineering Evaluation/Cost Analysis (EE/CA), enclosure (1), as a technical basis for the removal. Therefore, the term RI/FS shall hereinafter mean and/or be referred to as EE/CA.

f. Release Description

Chemicals of concern (COCs) have been identified based on the analytical data, risk drivers from the human health and ecological risk assessments, and exceedances of regulatory standards and criteria. The COCs (risk drivers) for soil, based on protection of human health for the current and future full-time employees, future construction workers, and hypothetical future residents, are arsenic and Aroclor 1260 (a PCB). Additional soil COCs based on protection of ecological receptors are Aroclor 1260, cadmium, lead, and to a lesser degree, mercury, copper, selenium, and zinc.

The sole COC (risk driver) for the shallow groundwater based on protection of human health (future construction worker and hypothetical future resident) is arsenic. No groundwater COCs were identified for the other human receptors evaluated

No COCs have been identified for surface water or sediment.

3. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

a. Threats to Public Health and Welfare

The potential exposures to contaminated soil and shallow groundwater to current and future full-time employees, future construction workers, and hypothetical future residents constitute the principal risks to human health. Actual or threatened releases from Site 41, if not addressed by a removal action, may present an imminent and substantial endangerment to human health or welfare. The purpose of the removal action is to prevent potential exposure to contaminated soil and shallow groundwater.

b. Threat to the Environment

Potential exposures to contaminated soil or shallow groundwater constitute the principal risks to ecological receptors. Ecological receptors that could be affected are terrestrial animals and plants that contact contaminants in surface soil. These contaminants could also enter the food chain. The purpose of the removal action is to prevent current and future potential exposure to contaminated soil.

4. NO ACTION ALTERNATIVE

Taking no action at this site may present an imminent and substantial endangerment to human health or welfare, as well as to the environment.

5. COMMUNITY PARTICIPATION

A Restoration Advisory Board (RAB) made up of community members and Navy, Federal, and state officials meets several times a year. The RAB is designed to act as a focal point for the exchange of information between IHDIV-NSWC and the local community regarding restoration activities.

EE/CA information and the Proposed Plan for Site 41 – Scrap Yard at IHDIV-NSWC in Indian Head, Maryland, were made available to the public. The RI Report, which constitutes part of the EE/CA, was made available in July 1999. The FS Report, which also constitutes part of the EE/CA, and the Proposed Plan were made available in January 2001. These documents can be found in the Administrative Record file and the information repository maintained at the IHDIV-NSWC General Library. The notice of the availability of these documents was published in the *Maryland Independent* on February 9, 2001 and the *La Plata – Indian Head Independent* on February 10, 2001. A public comment period was held from February 13, 2001 to April 6, 2001. In addition, a public meeting was held on February 20, 2001 to present the Proposed Plan to a broader community audience than those that had already been involved at the site. At this meeting, representatives of the Navy, EPA, and MDE answered questions about problems at the site and the remedial alternatives. The Navy's responses to the comments received during this period are included in the Responsiveness Summary, which is a part of the draft final Record of Decision (ROD).

Based on comments expressed at the public meeting and receipt of written comments during the public comment period, it appears that the community generally agreed with the soil removal and pad decontamination, which have now been converted to a removal action. A notice of availability and a brief description of this EE/CA document and the removal action will be published in the *Maryland Independent* and the public will be given thirty days to provide any comments.

6. COMPLIANCE WITH APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS) AND TO-BE-CONSIDERED REQUIREMENTS (TBCS)

This removal action would comply with the federal risk-based clean-up goals established for protection of human health and ecological receptors. Decontamination of the concrete pad would comply with federal PCB Spill Clean-up Policy (40 CFR 761 Subpart G) and attain Toxic Substances Control Act (TSCA) requirements (40 CFR 761) for exposure to residual PCB contamination. Off-site transportation and disposal and treatment (if required) of contaminated soil would comply with applicable regulations, including Identification and Listing of Hazardous Waste (COMAR 26.13.02); Standards Applicable to Generators of Hazardous Waste (COMAR 26.13.03); Ambient Air Quality Standards (COMAR 26.11.04); General Emission Standards, Prohibitions, and Restrictions (COMAR 26.11.06); Resource Conservation and Recovery Act (RCRA), TSCA, and U.S. Department of Transportation (DOT) requirements.

Some concentrations of trichloroethylene (TCE) and beryllium in shallow groundwater exceed federal and state Maximum Contaminant Levels (MCLs) for public drinking water. However, MCLs are not ARARs for this site. The removal action would not fully control exposure to the groundwater, but this will be addressed by the final remedy.

7. ACTIONS AND COSTS

a. Actions

The removal action for Site 41 involves soil removal and decontamination of the concrete pad, and includes the following major components:

- Approximately 2,000 cubic yards of contaminated soil will be removed and transported to an off-site disposal or treatment facility, depending on the amount of contamination. Soil containing more than 500 parts per million of polychlorinated biphenyls (PCBs) will be transported to an off-site incinerator. To facilitate excavation, abandoned railroad tracks will be removed, cleaned, and set aside for scrapping.
- The concrete pad within the fenced area of the scrap yard will be cleaned to remove residual soil, then inspected and sampled for PCB contamination. Once the condition of the pad is determined, a decision will be made on the decontamination method.
- Signs and/or notices will be put in place temporarily to prevent use of the shallow groundwater until the land-use control issue is resolved and the permanent institutional controls are in place.

b. Cost

A Contract Task Order for \$1,204,959 has been awarded under the Atlantic Division, Naval Facilities Engineering Command Remedial Action Contract.

c. Project Schedule

The removal action is scheduled for completion by the end of January 2003.


 Paula A. Gilbertson
 Installation Restoration Program Manager
 EFA Chesapeake

6/27/02
 Date


 Marc A. Siedband
 Captain, U. S. Navy
 Commander, Indian Head Division
 Naval Surface Warfare Center

7/24/02
 Date

Engineering Evaluation Cost Analysis (EE/CA)

Site 41 – Scrap Yard

Indian Head Division

Naval Surface Warfare Center

Indian Head, Maryland



Engineering Field Activity Chesapeake

Naval Facilities Engineering Command

JUNE 2002

ENCLOSURE(/)

INTRODUCTION

This is to establish the basis for an actual Engineering Evaluation / Cost Analysis (EE/CA) document for a non-time-critical removal action being undertaken under the authority of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 40 CFR 300.415 at Site 41 – Scrap Yard, Naval Surface Warfare Center (NSWC), Indian Head Division, Indian Head, Maryland. The removal action consists of soil removal and decontamination of the concrete pad. The intent of an EE/CA has been accomplished through the Remedial Investigation Report, reference (a) and the Feasibility Study Report, reference (b), which are hereby incorporated by reference and made part hereof. Public notification of availability and a brief description of the EE/CA will be accomplished through a notice published in the local newspaper.

DISCUSSION

The Feasibility Study (FS), which is now part of the EE/CA, developed remedial alternatives that address the risks identified in the Remedial Investigation (RI) report. The alternatives were evaluated and a Proposed Plan was prepared. Each of these documents was made available to the public for review and comment. The disagreement between the Department of Defense and the U. S. Environmental Protection Agency (EPA) over post-ROD (Record of Decision) requirements with respect to institutional controls has delayed the signing of the ROD. The Navy, EPA Region 3, and the Maryland Department of the Environment are in agreement with the physical portion of the selected remedy and that the ROD dispute over land-use controls should not impede its accomplishment. Therefore, the physical portion will be executed under the Navy's removal action authority, and land-use controls will be set forth in a ROD after resolution of the current dispute.

The Action Memorandum describes the situation and the removal action. The goal of the Navy is to remove the immediate threat to human health and the environment, by accomplishing the physical portion to prevent current and future potential exposure to contaminated soil. In

addition, signs and/or notices will be temporarily utilized, until the land-use control issue is resolved, to prevent use of the shallow groundwater.

The project is scheduled for completion by the end of January 2003.

REFERENCES

- (a) Remedial Investigation Report, Site 12 - Town Gut Landfill and IR Site 41 - Scrap Yard, Indian Head Division - NSWC, July 1999
- (b) Feasibility Study Report for IR Site 12 - Town Gut Landfill and IR Site 41, Scrap Yard, Indian Head Division - NSWC, January 2001