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MARYLAND DEPARTMENT OF THE ENVIRONMENT COMMENTS ON DRAFT EROSION  
AND SEDIMENT CONTROL PLAN AND STORMWATER MANAGEMENT PLAN FOR SITE 21  
BRONSON ROAD LANDFILL CLOSURE CONSTRUCTION NSWC INDIAN HEAD MD

08/12/2011

MARYLAND DEPARTMENT OF THE ENVIRONMENT



**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

1800 Washington Boulevard • Baltimore MD 21230  
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Martin O'Malley  
Governor

Robert M. Summers, Ph.D.  
Secretary

Anthony G. Brown  
Lieutenant Governor

Kathy M. Kinsey  
Deputy Secretary

August 12, 2011

Mr. Joseph Rail, P.E.  
NAVFAC Washington  
Washington Navy Yard, Bld. 212  
1314 Harwood Street SE  
Washington, DC 20374-5018

Re: Draft Erosion and Sediment Control Plan and Stormwater Management Plan Site 21 –  
Bronson Road Landfill Closure Construction, July 2011

Dear Mr. Rail:

The Federal Facilities Division of the Maryland Department of the Environment's Land Restoration Program has no comment on the above referenced document. This document was forwarded to the Water Management Administration's (MDE-WMA) Sediment and Stormwater Plan Review Division for review as well. Correspondence from MDE-WMA is enclosed.

If you have any questions, please contact me at (410) 537-3791.

Sincerely,

Curtis DeTore  
Section Head  
Federal Facilities Division

CD:cd

Enclosure

cc: Mr. Dennis Orenshaw  
Mr. Horacio Tablada  
Mr. James Carroll



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## Memorandum

TO: Mr. Curtis DeTore  
Federal Facilities Division  
Hazardous Waste Program  
Waste Management Administration

FROM: Jim Tracy/MFL *OKT*  
Sediment and Stormwater Plan Review Division  
Water Management Administration

DATE: August 1, 2011

Subject: MDE Plan Review No. **12-WM-0001**  
Navy Support Facility Indian Head,  
Site 21 Remedial Design,  
Contract: N62470-08-D-1001

SITE 21  
BRONSON RD LANDFILL

As requested, The Water Management Administration (WMA) has reviewed the plans provided July 29, 2011, prepared by CH2M Hill for the above referenced project at the Naval Support Facility Indian Head, in Charles County. The review was in accordance with Sections 4-106 and 4-205 of the Department of the Environment Article, Annotated Code of Maryland with regard to Sediment Control and Stormwater Management.

It is understood that this project is a Comprehensive Environmental Restoration, Compensation and Liability Act Project (CERCLA). As such, it is exempt from obtaining Stormwater and Erosion and Sediment control plan Approval; however the project is subject to the substantive requirements for Stormwater and Erosion and Sediment control. The following comments are a result of the review:

### General/SWM&ESC Plan Report

- 1) Please provide an MDE Transmittal form (application) with each submission.
- 2) The report introduction and details used refer to the 2010 ESC Standards. The 2010 standards are still DRAFT and were recently updated to a 2011 draft; please use the official 1994 versions; however the 2011 details are acceptable for use where no detail is available from the 1994 Standards. MDE will provide the 2011 details as needed without the DRAFT watermark for use when required. Please advise the reviewer of the details required after the plans revisions are complete.
- 3) The site is likely within the Critical Area of the Chesapeake Bay. Typically review by the Chesapeake Bay Critical Area Commission is required.

- 4) The site disturbed exceed 1.0 acre. Typically an NPDES NOI application would be required.
- 5) Please include some site photographs to verify existing site conditions.
- 6) Further review of the plans and report will be provided after revisions.
- 7) A Waiver of SWM under section 3.3.A would be acceptable; however the project clearly has at least two outfall points in existing conditions. From the proposed grading a significant portion of the drainage area will be redirected from one point (south) to the other (north).
- 8) Please provide a signed waiver application for each study point. Possible study points include the North and South on S. Bronson, the inlet/storm drain outfall along Components Place and an area to the east of the LOD.
- 9) Please provide an anti-seep collar design or justification why collars are not needed.

Cover Sheet/Index, DWG G-0

- 10) Please label the road names on the location map.
- 11) Please complete the MDE File number.

Erosion Control Legend and Notes, DWG EC-1

- 12) Please provide the signed certifications.
- 13) Sequence of Construction
  - a) Please install ESC needed to protect the grading for the sediment trap in step 2. Step 3 should then be the sediment trap construction, followed by the construction of the ED needed to convey runoff to the traps.
  - b) The sequence should detail the removal of the sediment traps and final grading of these areas.

Erosion Control Standard Specifications, DWG EC-2

- 14) Please confirm the standard specifications (and details) are taken from the ESC manual without revisions. Any modifications should be clearly indicated and explained (such as the fertilizing rates).
- 15) The note to provide soil testing to determine exact seeding ratios and fertilizer application rates is acceptable. However please note the testing results and conclusion should be submitted to MDE.

Erosion Control Plan Initial, DWG EC-3

- 16) SF is shown along Components Place outside the LOD. Please remove.
- 17) The ED along Components Place does not have positive drainage to the sediment trap.
- 18) The traps are noted to be 3:1 slopes. Please note that Gabion inlet protection is required with slopes steeper than 4:1 and riprap inflow protection on all other inflow points.
- 19) Please show Riprap (or gabion) inlet protection into the sediment traps where the concentrated inflows are provided. Please note North has a significant inflow from the existing channel.
- 20) Please note on the sediment trap tables, the existing drainage area and the proposed condition drainage area. Note, the trap should be designed based on the worst case.
- 21) A mountable ED or entrance culvert will be needed at the SCE to convey the sediment runoff from the ED to the ST South.
- 22) Please show the ROP for the pipe outlets of the traps.
- 23) A small area of the LOD to the east is not conveyed to either sediment trap.
- 24) Please provide additional contours to the east to verify the drainage boundaries.
- 25) The drainage divide around sediment trap south is incomplete and unclear. Please address.
- 26) Please label the in & out invert of the pipes in the sediment traps.

- 27) The sediment trap risers do not appear to be high enough to accommodate the outlet barrel needed. Please check.
- 28) The sediment trap south bottom elevation in the table is 37.0, should this be 34.0?
- 29) Please provide and show baffles in the sediment traps.
- 30) Please confirm that the depressed area at the North sediment trap is not an existing SWM facility.

Erosion Control Plan Final, DWG EC-4

- 31) Please show the LOD.
- 32) Please show the sediment controls in place.
- 33) The proposed grading ignores the sediment trap grading that has been completed.
- 34) Please label the inverts and grate/top elevations of the proposed storm drain systems.
- 35) The proposed grading, as shown to the East, will result in a small channel that is unprotected.

Erosion Control Details, DWG EC-5 thru EC-8

- 36) Please add/remove details as needed with revision to the design.
- 37) Please confirm the details provided are from the ESC manual and have not been modified. Any modifications to the details should be clearly noted and explained.
- 38) Please refer to the general comments on the 2010 ESC Manual.
- 39) DWG EC-6: Is the C-3 Perimeter Dike/Swale detail used anywhere on the plan? It is not found.
- 40) DWG EC-8: Please complete the sediment trap details with elevations, etc. Note the barrel and risers do not match the plan table.

Existing Conditions, DWG C-1

- 41) Sediment Trap south appears to intersect the limits of buried debris. Will that be an issue?

Excavation and Initial Improvement Plan, DWG C-2

- 42) The existing landfill material is located to interfere with the construction of the initial phase ESC. How will this be handled in the sequence?
- 43) The limits of clearing do not correspond with the LOD shown on the ESC plan. Please check.

Details, DWG C-6

- 44) Riprap Channel: Class I riprap D50 is 9.5" and thickness should be 19" minimum.

Review of this project will continue upon satisfactory response to the above comments. Please provide a point-by-point response to the comments and reference the MDE number with the resubmission. Please call me at (410) 537-3563 with any questions or comments.

JKT/MFL