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NSWC INDIAN HEAD  
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LETTER AND RESPONSE TO COMMENTS REGARDING DRAFT TECHNICAL  
MEMORANDUM FOR RESULTS OF WETLAND DELINEATION UNEXPLODED ORDNANCE 9  
AND 11 (UXO 9) (UXO 11) NSWC INDIAN HEAD MD  
3/5/2016  
CH2M HILL

# Responses to Comments on Draft UXOs 9 and 11 Wetland Delineation, NSFIIH, Indian Head, MD

PREPARED FOR: Joe Rail/NAVFAC Washington                      Travis Wray/NSFIIH  
Robert Thompson/EPA Region III                      Curtis DeTore/MDE

PREPARED BY: CH2M

DATE: February 19, 2016 (Revised March 3, 2016)

This memorandum provides responses to comments on the referenced document. Comments are presented as received, followed by CH2M responses in italics. Please review the responses to ensure they address your comments.

This tech memo was revised on March 3, 2106 to include Mr. DeTore's response.

## Comments from Joe Rail (NAVFAC Washington)—Received November 3, 2015

Mr. Rail had no comments on the document.

## Comments from Travis Wray (NSFIIH)—Received December 1, 2015

1. Page 3, final paragraph – according to the data sheet, *Persicaria sagittata* is listed as the second most common herb but *Polygonum sagittatum* is listed as number two in the text.

**Response:** *The scientific name for Arrowleaf tearthumb is Persicaria sagittata according to the 2014 Regional Wetland Plant List for the Atlantic and Gulf Coastal Plain region. The text of the report was updated to Persicaria sagittata rather than the old scientific name, Polygonum sagittarium, to be consistent with the data form.*

2. On the figures, perhaps label the upland and wetland data points so it is more clear which is which.

**Response:** *The data points are color coded in the legend to distinguish between upland and wetland data points. The unique identification numbers were added to Figures 6 and 7.*

3. Remove demolished and existing building layers and labels on Figure 6.

**Response:** *The demolished and existing building layers and labels were removed from Figure 6.*

4. On UXO9 data sheets, label the sampling point in the top right corner similar to the data sheets for UXO11.

**Response:** *The data forms for UXO9 have been labeled on all pages to be consistent with UXO11.*

5. For W001 under summary of findings it says that Hydric Soil is not present (similar to what is said in the text) but on the "Soil" page of the data form it says that Hydric soil was present meeting the criteria of F3. I am curious as to how the wetland boundary was delineated for this one since soil was not hydric. Did they use the presence of saturated soil and vegetation? Also, I always thought

that all three criteria had to be met in order for it to be considered a wetland?

**Response:** *The text and datasheet were revised to be consistent. The wetland was considered an atypical wetland because of perceived recent disturbances to the soil. The soils are considered problematic hydric soils, because they are soils that may not meet the hydric soils definition, but are still considered hydric due to several potential factors including, recently developed areas, seasonally ponded soils, etc. (USACE 2012). The wetland was delineated based on changes in plant community and saturated soils.*

6. The U003 sampling point is labeled as W003C on the vegetation and soil pages (pages 1 and 2).

**Response:** *The U003 data form was updated to correct the typographical error.*

7. W003 is labeled as W003-PFO on the first page but then W003C on the next two pages.

**Response:** *The W003-PFO data form was corrected to be consistent with all pages within the data form.*

8. The Prevalence Index worksheet is not filled out for sampling point W003.

**Response:** *The W003 prevalence index worksheet was updated to be consistent with the other data forms within the report.*

9. I realize the wetland closest to the Potomac River in UXO 11 is classified as palustrine emergent marsh (PEM) just like the other wetland further upstream but I think an additional data point in this portion of the wetland would have been beneficial in the report. Just a future suggestion not a request to add a data point to this report.

**Response:** *Comment is acknowledged.*

### Comments from Robert Thompson (EPA Region III)—Received February 10, 2016

Mr. Thomson and BTAG had no comments on the document. Per Mr. Pluta (BTAG), “Representatives of the BTAG have completed the review of the subject document and have no comments. The findings were incorporated into the Navy Response to Comments for Remedial Investigation for UXO 11 which was recently reviewed by BTAG.”

### Comments from Curtis DeTore (MDE)—Received March 3, 2016

Mr. DeTore had no additional comments.