



MARYLAND DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway • Baltimore Maryland 21224
(410) 631-3000 • 1-800-633-6101 • [http:// www.mde.state.md.us](http://www.mde.state.md.us)

Parris N. Glendening
Governor

Jane T. Nishida
Secretary

April 21, 1998

Ms. Armalia Berry
BRAC Environmental Coordinator
Engineering Field Activity-Chesapeake
Naval Facilities Engineering Command
901 M Street SE
Building 212, Code 181
Washington DC 20374-5018

RE: Draft Work Plan for Remedial Investigation and Feasibility Study, Former Naval Surface Warfare Center, White Oak, February 1998

Dear Ms. Berry:

Enclosed are the Maryland Department of the Environment, Waste Management Administration's comments on the above-referenced document.

If you have any questions, please contact me at (410) 631-3440.

Sincerely,

Donna A. Lynch
Remedial Project Manager
Federal/NPL Superfund Division

Enclosure

cc: Ms. Yazmine Yap-Deffler, U.S. EPA
Mr. Richard Collins
Mr. Jim Richmond
Ms. Shari Wilson

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION**

Comments on

**Draft Work Plan for Remedial Investigation and Feasibility Study,
Former Naval Surface Warfare Center, White Oak, February 1998**

GENERAL COMMENTS

1. The rationale for analyzing one sample from each media for gross alpha and gross beta is not clear. One sample is not a sufficient sample size to conduct a quantitative risk assessment of the potential radiological constituents at this site or to statistically determine whether the site differs from the background data. The Maryland Department of the Environment (MDE) suggests that the Navy utilize the *EPA Risk Assessment Guidance for Superfund, Volume 1, Chapter 10* for guidance on sampling needs for conducting a radiation risk assessment at the facility.
2. One round of groundwater sampling is not sufficient to characterize groundwater contamination at these sites. The Base Realignment and Closure Cleanup Team (BCT) had previously decided that quarterly groundwater sampling should be conducted at the facility. Please clarify why this BCT decision is not reflected in this document.

SPECIFIC COMMENTS

1. Page 1-8, Site 9. The text should be revised to indicate that this site consists of both leaching wells and leach fields.
2. Page 1-12, Section 1.3.1. The Navy should use the EPA Region III risk-based concentrations to screen for contaminants during this remedial investigation. Additionally, Maryland Toxic Substances Criteria for Ambient Surface Waters (Code of Maryland Regulations [COMAR] 26.08.02.03-2) and Maryland Maximum Contaminant Levels (COMAR 26.04.01.06 and 24.04.01.07) should be used to compare the contaminants of concern in surface water and groundwater, respectively.
3. Page 1-12, Section 1.3.2. The Navy should utilize the recent EPA guidance concerning soil screening levels. The recent EPA guidance documents are: *Soil Screening Guidance* (April 1996) and *Soil Screening Guidance Technical Background Document* (May 1996).
4. Page 1-3, Section 1.3.4. MDE's sediment and erosion control regulations in COMAR 26.17 may also apply during the excavation of soils.
5. Figure 3-2. The proposed location of well 03GW106 does not appear to be a practicable location to install a well due to the steep slope and the proximity of the property fence. MDE suggests that the Navy propose an alternate location for this monitoring well.

6. **Figure 3-2. The proposed location of well 03GW107 appears to be located in the landfill. MDE does not recommend that the Navy drill into the landfill because of the potential for unexploded ordnance at this site.**
7. **Page 4-23, Section 4.2.5, 2nd paragraph, 2nd sentence. MDE does not agree that surface soil samples should be taken within the area of this site that was excavated during the removal action in 1996 as clean fill was used for backfill. Surface soil samples taken in the area of clean fill will not provide any information on the nature and extent of contamination at this site.**
8. **Page 6-6, 1st paragraph, 5th sentence. Please see comment #3.**