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**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

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Parris N. Glendening  
Governor

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Secretary

April 19, 1999

Mr. Walter Legg  
Engineering Field Activity, Chesapeake  
Washington Navy Yard, Bldg 212  
901 M. Street, SE  
Washington DC 20374-5018

RE: Sampling and Analysis Plan Amendment for Explosives Contamination  
Investigation for Former NSWC White Oak, Maryland, dated October 1998.

Dear Mr. Legg:

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

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

Sincerely,

Jeff Thornburg  
Remedial Project Manager  
Federal Facilities Section

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Enclosure

cc: Mr. Richard Collins  
Ms. Shari Wilson  
Ms. Yazmine Yap-Deffler, EPA Region III  
Ms. Kim Bellis, EFACHES

**Maryland Department of the Environment  
Waste Management Administration  
Environmental Restoration and Redevelopment Program**

Comments on:

Sampling and Analysis Plan Amendment for Explosives Contamination Investigation for  
the former NSWC White Oak, Maryland, Dated: October 1998

General Comments:

1. The above referenced document provides a description of the proposed sampling locations, and an overview of the applied methodologies for soil and subsurface soil analysis only. The Navy intends to conduct groundwater sampling under a separate Contract Task Order (CTO #298). Although these two projects are financed via separate contract mechanisms, the State recommends that all pertinent explosive data be assembled in a single comprehensive document. A total assessment of facility wide explosive contamination in all media can then be made, and the appropriate remedial decisions subsequently evaluated.
2. In order to facilitate the placement of groundwater monitoring wells, which will be discussed in CTO #298, please include a larger scale map to accommodate monitoring well placement for the areas of concern associated with this study. This map would be helpful in comparing selected soil and sediment sampling locations and data sets to data derived from groundwater monitoring efforts.

Specific Comments:

1. Table 2-1, Building-Specific Information and Recommendations, Page 2-2  
Historical information indicates that explosives related activities were conducted at Building 363. Further, a leaching well (LW-12) is identified in Figure 2-1 in close proximity to Building 363. Please provide the rationalization for the 'no sampling' recommendation for Building 363 listed in Table 2-1.
2. Table 2-1, Building-Specific Information and Recommendations, Page 2-3
  - a) The sampling recommendations listed for Building 333 specify the collection of five surface soil samples. However, only one surface soil sample location is included in the corresponding Figure 2-3. Please clarify the location and frequency of sampling in this area.
  - b) The building numbers 335-1, 335-2, and 335-3 listed in Table 2-1 do not correspond to the building numbers listed in the reference map, Figure 2-4. Please clarify this discrepancy in the final version of the document.
  - c) The 'summary of other information' column identifies that the Building 335 exhaust fans were a potential means for airborne contamination dispersion into

adjacent berm areas. Please include the locations of exhaust fan outlets, and the berm areas on Figure 2-4 so that appropriate sampling locations can be determined.

d) The historical usage of Buildings 324-A, and 324-1 should be included in Table 2-1. Any subsurface drainage piping or connection to the existing sump should also be investigated if explosives were handled in these buildings.

e) Although visual evidence does not support historical explosive activity, the State recommends a soil-boring sample be collected in the vicinity of Leaching Well 4 (LW 04). The 319 Buildings are in close proximity to the 324 Buildings, which are known to have handled explosives. Available information does not identify any of the 319 Buildings as significant research and development centers, however the potential still exists for contamination to be present.

f) The drainage features associated with Building 321 should be identified. If radionuclides were handled at this location, then a sample should be collected from the leach field or leaching well associated with the Building 321 drainage system, and analyzed for gross alpha/beta radionuclides. The State also recommends that the parameter list be expanded to include gross alpha/beta for the proposed surface soil sample located west of Building 321.

3. Table 2-1, Building-Specific Information and Recommendations, Page 2-4

The 'summary of other information' identifies the Building 312A sump as a potential source of contamination. Please include the sump location in Figure 2-8, and provide any recommendations for waste characterization in Table 2-1, page 3 of 13.

4. Table 2-1, Building-Specific Information and Recommendations, Page 2-5

a) Building 317 is described as a bombproof building. It has been identified as performing the same function as Building 314: testing of various explosives. Sampling is proposed around Building 314, but not around the perimeter of Building 317. The State recommends that soil sampling be conducted in the vicinity of Building 317.

b) It is not clear if the two adjacent water-holding tanks are connected. If the tanks are independent of one another, it is recommended both tanks be sampled for explosive compounds.

5. Table 2-1, Building-Specific Information and Recommendations, Page 2-6

a) Please indicate the approximate location of the drain field in relationship to Leaching Well 02 (LW 02).

b) Building 325 is a bombproof building. The sampling in the vicinity of this structure should be consistent with other buildings serving the same function. Reference Specific Comment 4a.

6. Table 2-1, Building-Specific Information and Recommendations, Page 2-9  
It is not clear whether the Navy intends to sample the building 336 leach fields following geophysical identification. Please provide any additional information regarding proposed action once these fields have been located.
7. Table 2-1, Building-Specific Information and Recommendations, Page 2-11  
Although current visual evidence does not indicate historical explosive activity at Building 323, the State recommends that soil-borings be collected in the vicinity of Leaching Well 4 (LW 15) and the associated drain field due to the unknown nature of past building usage.
8. Figure 2-8
  - a) Building 318 is not identified on the map. Please include a building number to designate the structure outline.
  - b) Building 329 appears on the figure, but it is not described in the corresponding table (Table 2-1, page 2-4). Please provide a description of this structure and any known historical usage information.
9. Figure 2-19  
Building 390 is described in the corresponding table (Table 2-1, page 2-10), but is not identified in the figure. Please correct this discrepancy.
10. Figure 2-22  
The drainage features associated with building 620 are a potential major source for explosive related compounds. Soil boring locations are listed on the figure, however the associated drainage ditches and sumps adjacent to the structure are not identified. It is not clear from the information contained in the figure whether the sumps and drainage ditches will be sampled, or whether the leach fields will be sampled, or both. Please delineate the locations of the aforementioned features to the maximum extent possible so that selected sampling points can be evaluated.