



Section: 13.01  
Site 20903-5640 (White Oak)  
Doc. #: 0027

**MARYLAND DEPARTMENT OF THE ENVIRONMENT** 00449

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

N60921.AR.000177  
NSWC WHITE OAK  
5090.3a

February 4, 1999

Ms. Armalia Berry  
Engineering Field Activity, Chesapeake  
Washington Navy Yard, Building 212  
901 M Street, SE  
Washington DC 20374-5018

RE: RASO Work Plan for Soil Removal at Sites 10 & 14, NSWC White Oak, Maryland.  
Dated October 1998

Dear Ms. Berry:

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

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

Sincerely,

Jeff Thornburg  
Remedial Project Manager  
Federal/NPL Superfund Division

JT:bjm

cc: Ms. Yazmine Yap-Deffler  
Mr. Richard Collins  
Ms. Shari Wilson

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

Comments on

RASO Work Plan for Soil Removal at Sites 10 & 14, NSWC White Oak,  
Maryland, Dated October 1998

**General Comment**

The above referenced document does not adequately address several elements that should have been included in the removal action work plan. The work plan must include descriptions of the procedures to address the excavation, handling, transport, and disposal of the contaminated media. A list of the individuals or organizations participating in the aforementioned activities should be contained in the text, including their roles, and the appropriate certifications to perform the work assignments.

**Specific Comments**

1. Summary Section, page 6, third paragraph

The third paragraph states the document was prepared to describe the methods and activities to be performed during the survey of the 'Hancock Landfill.' Please revise the text to include the appropriate designation of the area to be addressed.

2. Radiological Survey Work Plan. Section 1.0, Purpose, page 7

The intent of this document is to provide details regarding the removal of radiological contaminated soils from two Installation Restoration Program sites located on the property of the former Naval Surface Warfare Center, White Oak. Although screening activities are an integral part of the intended task, they are not the purpose of this work plan. Please revise this section to reflect the objectives of the soil removal action.

3. Description of the Site, page 7, second paragraph

Please provide diagrams of the estimated areas of soil removal at Sites 10, 14, and the contaminated areas outside Site 14. The limits of waste are adequately identified; the area of excavation, however, is not clearly defined.

4. Section 7.0, Scope of Activities, page 8

- a. The contractor or organization responsible for excavation and removal of contaminated soil should be identified in this section. In addition, mobilization dates, and projected work schedules should be provided.

- b. An estimate of the total volume of soils to be removed from Sites 10, 14 and the contaminated areas listed outside of Site 14 should be included in this section.

c. Should the area of excavation at any time exceed 5000 square feet, erosion and sediment control measures will be required.

d. The disposal facility selected to receive the contaminated soil should be specified. The document should also discuss the regulatory status of this contaminated soil. It should be clearly stated whether the soil shipped off site would count against Maryland's Radiological Compact Quota, or if the material will be handled as Department of Defense low level waste (Maryland quota exempt).

e. The origin of clean fill should be identified in the document. A figure should be included in the document delineating the borrow area. Clean fill will be screened for radiological contamination. However, this clean fill should also be screened for Target Analyte List and Target Compound List contaminants unless it is obtained from a certified clean fill source.

5. Section 7.1.2, Radiation Scan Survey, page 8

Following the removal of existing contaminated soil, and prior to the deposition of clean fill, the Navy should consider conducting confirmation sampling to ensure all radiological contaminated media is removed.