



Section: 13.01  
Site 20903-5640 (White Oak)  
Doc. #: 0028

00450

## MARYLAND DEPARTMENT OF THE ENVIRONMENT

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NSWC WHITE OAK  
5090.3a

Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

February 5, 1999

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

RE: High Hazard Services Work Plan for Soil Removal at Sites 10 & 14, NSWC White Oak, Maryland

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 Section

JT:bjm

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

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

Comments on  
High Hazard Services: Work Plan for Soil Removal at Sites 10 & 14, NSWC  
White Oak, Maryland

**General Comment**

A glossary of acronyms and unit measurements would be helpful for reference purposes. Much of the nomenclature associated with radiological activities is unique, and may not be familiar to some readers. The Navy should consider adding such a list to the preface of the document.

**Specific Comments**

1. Section 1.1, Project Objective, 3<sup>rd</sup> paragraph

The text specifies all work will be conducted in accordance with the Radiological Survey Work Plan. Because two work plans exist for this activity (RASO and High Hazard Services), clarification should be made as to which plan this statement references. This distinction should be maintained throughout the text wherever there are statements potentially applicable to both documents.

2. Section 1.2, Management Approach, 2<sup>nd</sup> paragraph

It is not clear whether the screening criteria limits defined by the Nuclear Regulatory Commission (NRC) are endorsed by the U.S. Environmental Protection Agency (EPA). If the EPA standards for release for unrestricted use are equivalent to the NRC standard, concurrence between agencies should be clarified. If the values differ, it should be stated whether NRC standards are more or less conservative.

3. Section 3.3, Waste-Disposal Practices, 2<sup>nd</sup> paragraph

The work plan does not include area-wide post excavation radiological soil screening prior to backfill and re-grading. Provisions for the identification and screening of 'unidentified ground or area contamination' are made in the text, however the qualifying conditions for an area to be classified as 'unidentifiable' are not presented. Post excavation screening of only certain areas meeting 'unidentified' status leads the State to believe the screening process will be conducted only in selected anomalous areas, and not the entire excavation surface. In order to ensure complete removal of all contaminated soil, the State recommends a comprehensive post excavation screening of all of the removal area surfaces prior to the deposition of backfill material. There is no provision in the High Hazard Services work plan, or the RASO work plan for this type of confirmation screening.

4. Section 5.2, Preparation and Staging, 1<sup>st</sup> paragraph

Contaminated soils and concrete rubble will be loaded into 'B-25 boxes' for containment, manifesting and transport to the disposal facility. A description of a 'B-25' box should be included in the text including radiation shielding capacity and any applicable regulatory agency (NRC, Department of Transportation) approval for shipping and handling.

5. Section 5.3 Excavation of Contaminated Soils

Post excavation screening of the excavated area should be performed prior to backfilling. A description of screening procedures and equipment needs to be included in this section. Reference comment #3.

6. Section 5.5, Backfill of Excavated Areas

- a. The borrow area from which backfill will be derived has not been identified in either the RASO or the High Hazard work plans. Please provide the origin of the backfill material.
- b. It is not clear whether the backfilled areas will be re-seeded by the removal contractor. Please clarify if the Navy intends to re-seed affected areas employing the services of the removal contractor, or if another contractor will be hired to perform the services.
- c. Should the area of excavation at any time exceed 5000 square feet, erosion and sediment control measures will be required.

7. Section 6.1, Area Control and Operations, 1<sup>st</sup> paragraph

The text states that the staging area 'may be' secured and marked as a Radioactive Materials Area in order to maintain control of potentially radioactive soils. Please explain the conditions that if met, will require control measures to be implemented. If control measures will be triggered based on target screening values, the Navy should clarify the criteria for action.