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**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

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Parris N. Glendening  
Governor

Merrilyn Zaw-Mon  
Acting Secretary

August 19, 2002

Mr. Walter Legg  
Engineering Field Activity Chesapeake  
Washington Navy Yard, Building 212  
1314 Harwood Street SE  
Washington DC 20374-5018

Re: Draft Work Plan for Soil Removal, Sites 10 and 14, Naval Surface Warfare Center (NSWC) White Oak, Silver Spring, Maryland, dated June 2002

Dear Mr. Legg:

Enclosed are comments from the Federal Facilities Section of the Maryland Department of the Environment's Waste Management Administration on the above-referenced document.

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

Sincerely,

Mark A. Callaghan  
Remedial Project Manager  
Federal/NPL Superfund Division

cc: Mr. Bruce Beech  
Mr. Scott MacEwan  
Mr. Scott Nesbit  
Mr. Richard Collins  
Mr. Karl Kalbacher

**Maryland Department of the Environment  
Waste Management Administration  
Federal Facilities Section**

Comments on:

Draft Work Plan for Soil Removal, Sites 10 and 14, Naval Surface Warfare  
Center (NSWC) White Oak, Silver Spring, Maryland, dated June 2002

**General Comment**

In accordance with the Code of Maryland Regulations (COMAR) 26.17.01.05), excavation activities that exceed 5000 square feet in area or disturb a volume of soil greater than 100 cubic yards require that a sediment and erosion plan be implemented. If the Navy's planned removal exceeds either of the above criteria, then the Navy, given the nature of the removal action, should comply, to the maximum extent practical, with the substantive requirements of COMAR 26.17.01.05.

**Specific Comments**

1. Purpose, Section 1.0, page 7  
Please revise the first sentence to read, "The purpose of the soil removal operation is to remove contaminated soil from Sites 10 and 14 until a residual level of less than 5pCi/gm above Radium-226 background levels for the White Oak facility remains."
2. Description of the Site, Section 3.2, page 8  
Figure 4 depicts Site 10 as an area 29.5 feet by 32.8 feet. Please revise this sentence to read, "The site is approximately 30 feet by 33 feet."
3. Description of the Site, Section 3.3, page 8  
Figure 4 depicts Site 14 as an area 22.9 feet by 56.1 feet. Please revise this sentence to read, "The site is marked as being approximately 23 feet by 56 feet."
4. Radiological Scan Survey, Section 9.1.2, page 11  
As Radium-226 is an alpha emitter with accompanying gamma radiation, please provide the rationale as to why a gamma radiological scan survey alone will be sufficient to fully delineate and refine the excavation parameters.
5. Excavation Depth and Areas, Section 9.1.4.2, page 12  
Further information should be provided as to the nature of the confirmation sampling. Include a discussion for use of fixed site laboratory analysis for a portion of the post-excavation sampling.