



**MARYLAND DEPARTMENT OF THE ENVIRONMENT** 00495  
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N60921.AR.000474  
NSWC WHITE OAK  
5090.3a

Section: 02,01  
Site 20903-5640 (White Oak)  
Doc. #: 0033

Robert L. Ehrlich, Jr.  
Governor

Lynn Y. Buhl  
Acting Secretary

Michael S. Steele  
Lt. Governor

Kendl P. Philbrick  
Deputy Secretary

May 9, 2003

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 IR Sites 10 and 14 Soil Removal, Former Naval Surface Warfare Center (NSWC) White Oak, Silver Spring, Maryland, dated April 2003

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) 537-3440.

Sincerely,

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

MAC:bjm

cc: Mr. Bruce Beach  
Ms. Kathy Landkrohn  
Mr. Scott Nesbit  
Mr. Karl Kalbacher  
Mr. Horacio Tablada

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

Comments on:

Draft Work Plan for IR Sites 10 and 14 Soil Removal, Former Naval Surface  
Warfare Center (NSWC) White Oak, Silver Spring, Maryland  
dated April 2003

**General Comment**

1. Figures should be included within this work plan that show the location of the former NSWC White Oak and the location of Installation Restoration Sites 10 and 14 within the facility. A figure should also be provided that details the overall layout of the two sites, which should include significant site features and the approximate extent of excavation of the two sites.
2. Should a radiological survey of the intended area reveal an extent of contamination that would necessitate removal action activities to exceed 5000 square feet and/or the disturbance of a volume greater than 100 cubic yards of earth, the Navy will be required to meet the substantive requirements of an approved Erosion and Sediment Control Plan, as specified in Code of Maryland Regulations 26.17.01.05.

**Specific Comments**

1. Section 1.0, Introduction/Background, page 1-1  
The text states that radiological material was historically used in conjunction with explosives research at the facility. Additional information should be included with this section to indicate the nature of the historical release of radiological waste currently present at Sites 10 and 14.  
  
Various reports over the history of this site refer to this release of Radium-226 in the soil as either a radium paint spill, a purposeful deposition of waste radium paint or a result of paint stripping operations on naval instrumentation. An overview of the incident, as well as the subsequent removal actions that have been conducted at the site, should be provided to further clarify this issue.
2. Section 1.1, Project Objective, page 1-1  
It is stated that, "Based upon the results of this sampling, additional contaminated soil will be removed as required to achieve the remedial goal." This section should be expanded if it is the intention of the Navy to clean up to a remedial action level of 5 pCi/g or to base the remedial action level on a value that corresponds with a level inside the U.S. Environmental Protection Agency's target risk range of  $1.0 \times 10^{-4}$  to  $1.0 \times 10^{-6}$ , then this should be stated within this section as the remedial goal.

3. Section 2.3, Excavation of Contaminated Soils, page 2-1  
Further information should be provided within this section to explain how the Navy intends to delineate the area contaminated with Radium-226 prior to excavation.
  
4. Section 2.5, Sampling, Transportation and Disposal, page 2-2  
In addition to excavated soils being analyzed for waste disposal characteristics, Investigation Derived Waste (IDW) generated during the removal action should also be sampled and analyzed for disposal characteristics. Furthermore, it should be stated within this section that upon receipt of analytical results for the excavated soil and IDW, that they will be disposed of in accordance with federal and state regulatory guidelines.