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**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

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Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

July 18, 2001

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

Re: Letter Work Plan, Site 11 Groundwater Data Gap Investigation, Former NSWC White Oak, Silver Spring, Maryland, dated June 2001

Dear Mr. Legg:

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

If you have any questions, please contact me at (410) 631-3497.

Sincerely,

Jeff Thornburg  
Remedial Project Manager  
Federal/NPL Superfund Division

JT:bjm

Enclosure

cc: Ms. Krista Grigg, EFACHES  
Mr. Darius Ostrauskas, U.S. EPA  
Mr. Richard Collins  
Mr. Karl Kalbacher

Maryland Department of the Environment  
Waste Management Administration  
Environmental Restoration and Restoration and Redevelopment Program  
Comments on:

Letter Work Plan, Site 11 Groundwater Data Gap Investigation, Former NSWC  
White Oak, Silver Spring, Maryland, dated June 2001

Specific Comments

1. Page 3, Data Gap 6, 2<sup>nd</sup> paragraph  
While the information collected through these efforts will aid in the selection of potential remedial alternatives, it may not be sufficient to complete the natural attenuation evaluation process. Regulatory guidance regarding the number of sampling rounds required to establish adequate data trends over time may require additional investigation and/or documentation to complete the evaluation of this potential remedy. The text should be revised to reflect these uncertainties.
2. Page 3, Scope of Work, Well Drilling/Installation, 3<sup>rd</sup> paragraph  
Once packers insulate productive fracture zones, the text states that samples will be collected and analyzed for volatile organic compounds via quick turnaround lab analysis. It is not clear how the packed off well intervals will be developed prior to groundwater sampling. Please include procedures and provisions for proper development in order to obtain accurate representative samples from these zones.