

3.01 2/27/96 708



MARYLAND DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway • Baltimore, Maryland 21224
(410) 631-3000

Parris N. Glendening
Governor

Jane T. Nishida
Secretary

February 27, 1996

Mr. Jeff Kidwell
LANTDIV
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk VA 23511-2699

RE: Work Plan for Geophysical and Aquifer Testing at Site 1 and Site 10 and Groundwater Sampling at the Allegany Ballistics Laboratory Superfund Site, December 1995.

Dear Mr. Kidwell:

Enclosed are the Maryland Department of the Environment, Waste Management Administration's (MDE/WAS) comments on the above referenced document.

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

Sincerely,

Wendy True Noe
Remedial Project Manager
Federal/NPL Superfund Division

WTN:bjm

Enclosure

cc: Mr. Tom Bass, WVDEP
Mr. Bruce Beach, EPA Region III
Mr. Dave McBride, Allegany Ballistics Laboratory
Mr. J. Greg Mott, CH2M Hill
Mr. Lou Williams, NAVSEA
Mr. Richard Collins
Mr. Robert DeMarco

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION**

Comments:

Work Plan for Geophysical and Aquifer Testing at Site 1 and Site 10 and Groundwater Sampling
at the Allegany Ballistics Laboratory Superfund Site, December 1995

GENERAL COMMENTS

1. The samples collected from residential wells should be analyzed using reporting limits that are appropriate for comparison with maximum contaminant levels (MCLs). Please indicate this in the text.

In addition, there is a discrepancy between the discussion of the residential well sampling in Section 5, Task 6 and Table 1-2 in the *Field Sampling Plan for the Geophysical Logging, Aquifer Testing, and Groundwater Sampling for Sites 1, 5, and 10 at the Allegany Ballistics Laboratory Superfund Site*. Table 1-2 indicates that the residential wells will be analyzed for both dissolved and total TAL (target analyte list) parameters, but the text in Section 5, Task 6 indicates that the residential wells will be sampled only for dissolved TAL parameters.

Samples collected from the residential wells should be analyzed for total metals. Analyses for total metals should represent the groundwater consumed by the residents.

2. Please reference Table 1-2 included in the *Field Sampling Plan for the Geophysical Logging, Aquifer Testing, and Groundwater Sampling for Sites 1, 5, and 10 at the Allegany Ballistics Laboratory Superfund Site* for clarification of the number and type of samples described in this Work Plan.
3. The monitoring wells located in Maryland (1GW16, 1GW17, 1GW18, and 1GW19) are scheduled to be sampled for TCL (target compound list) VOCs (volatile organic compounds) and TAL dissolved inorganics. Because concentrations of dissolved arsenic were detected in each of these wells during RI (remedial investigation) sampling, these wells should also be sampled for total metals. A comparison of total to dissolved arsenic concentrations will yield more information than a dissolved concentration alone. For instance, the comparison may provide information on the chemical form and mobility of the arsenic.
4. Section 6 (Project Schedule) indicates that a 15-day review period was assumed for all submittals. As discussed in telephone conversations, the MDE/WAS is scaling back its oversight of the Allegany Ballistics Lab for the present time. Consequently, document review times, where MDE input is requested, will be determined through negotiation.