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

William Donald Schaefer
Governor

David A.C. Carroll
Secretary

December 21, 1993

Mr. Shawn Jorgensen
Environmental Section
Indian Head Division
Naval Surface Warfare Center
101 Strauss Avenue
Indian Head, MD 20640-5035

Dear Mr. Jorgensen:

Enclosed are the Maryland Department of the Environment, Waste Management Administration's comments to the Draft Post Removal Action Sampling Plan for Site 8 - Nitroglycerin Plant Office. Kim Lemaster discussed these comments with Shawn Phillips by telephone on December 10, 1993.

If you have any questions or need to discuss these comments, please contact Mr. Lemaster or myself at (410) 631-3440.

Sincerely,

Arlene G. Weiner, Chief
Federal and NPL Superfund Division
Environmental Response and Restoration Program

AGW:bjg

Enclosure

cc: Mr. Richard W. Collins
Mr. Robert A. DeMarco
Mr. Hank Sokolowski, U.S. EPA

MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION

Comments to the Draft Post Removal Action Sampling Plan
for Site 8 - Nitroglycerin Plant Office (dated October 1993)
December 10, 1993

Section 2.2

In order to increase the reliability of the post removal sampling, more samples should be collected than are proposed. As discussed with Shawn Phillips (CHESDIV), seven transects are proposed: one at the outfall and six downstream at 50-foot intervals. Sampling three locations along each transect, as proposed, is considered to be sufficient.

Page 2-4, 1st paragraph, 3rd sentence:
The sentence should be changed to read "...the Remediation Goal of 10 mg/kg total mercury...".

Section 3.1.1

The use of hexane as the solvent for mercury wipe sampling is not clear. Typically, metals are expected to be mobilized by acidic solutions, rather than nonpolar solvents such as hexane.

While the action level of 10 mg/kg of mercury for the soil/sediment matrix is understood, it is not clear what the action level for the wipe sample is to be. Typically, wipe samples yield net quantities of material (mercury), which may then be related to the area wiped. The action level goal for wipe sampling should be stipulated.

In order to better address the post-removal effectiveness on the manhole and conduit, more wipe samples should be considered. Wipes collected from the manhole, pipe midpoint, and outfall should be considered. While realizing that the manhole and midpoint samples would have to use some means of remote collection, the effort of such an activity should be weighed against the increased confidence and documentation that the intervening conduit met with post removal criteria.

Section 4.1.3.4

The discussion of obtaining a field blank sample by "...removing the filter, moisten it with hexane, and ..." is not clear. Field blanks are typically obtained by collecting deionized (or distilled) water in sample containers (appropriately preserved) and submitting them for analysis with other samples collected the same day.

Table 4-1

The footnote indicates that four transects are proposed, while the text indicates three transects. As discussed above, increasing the number of transects is recommended.

Table 4-2

This table indicates that 4 samples will be analyzed for TCLP metals, but the text makes no mention of this.