



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

Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

February 7, 1996

Mr. Shawn Jorgensen  
Naval Surface Warfare Center  
Indian Head Division (Code 0952C)  
101 Strauss Avenue  
Indian Head MD 20640-5035

Re: Post Removal Action Report for Site 5 - Swale No. 2 at Indian Head Division, Naval Surface Warfare Center.

Dear Mr. Jorgensen:

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

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

Sincerely,

Kim Lemaster  
Acting Section Head  
Federal/NPL Superfund Division

cc: Mr. Dennis Orenshaw, U.S. EPA  
Mr. Shawn Phillips, U.S. NAVY EFACHES  
Mr. Richard Collins  
Mr. Robert DeMarco  
Ms. Hilary Miller

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

Comments on the Post Removal Action Report for  
Site 5 - Swale No. 2 at Indian Head Division,  
Naval Surface Warfare Center

1. Section 3.2, page 3-4, paragraph 2, third sentence

The second word in this sentence should be changed from “metal” to “material” or “potentially contaminated soil”. In addition, the analytical results of the TCLP analysis should be presented in this report.

In determining the extent of removal for this subsurface, darkened soil, was the same criteria of 10 ppm silver used? If not, then the text should document this fact for subsequent review during the remedial investigation process.

2. Section 3.4, page 3-5

The long-term stability of the placement area is an important factor in this removal action. This section indicates that regular compaction tests were not performed on the placed soil, and that the final cover failed the compaction test. The possibility of settling and erosion problems are almost inevitable. The maintenance of the soil cover on this placement area is necessary to prevent migration of the silver-laden soil from the placement area.

3. Section 3.5.1, pages 3-5 and 3-6

The final slope of the reconstructed swale should be described, and “as built” drawings should be included in Appendix D.

4. Section 3.5.3, page 3-6

As discussed in comment 2 above, the stability of the placement area is of concern. The low performance for the compaction tests for the clay and final soil layers indicate possible problems with settling and erosion. The maintenance of this area will require special attention in order to ensure that settling and erosion are properly controlled to mitigate exposure of the silver-laden soils to runoff.

The final slope of the Rum Point placement area should be described, and “as built” drawings should be included in Appendix D.