



MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

March 7, 1996

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

Re: Work Plan for Removal of Lead-Contaminated Soil at Site 56, Naval Surface Warfare Center, Indian Head Division, OHM Remediation Services Corporation, February 1, 1996

Dear Mr. Jorgensen:

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 contact Mr. Kim Lemaster or me at (410) 631-3440.

Sincerely,

Donna A. Lynch
Remedial Project Manager
Federal/NPL Superfund Division

DAL:bjm

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**

Comments on

Work Plan for Removal of Lead-Contaminated Soil at Site 56, Naval Surface Warfare Center,
Indian Head Division, OHM Remediation Services Corporation, February 1, 1996

SPECIFIC COMMENTS

1. Page 3-1, Section 3.1, 3rd bullet. In order for the water filtration process to run 24 hours a day, appropriate process monitoring and control features will need to be in place in the event that there is a failure of any unit within the system. Additionally, if the Navy plans to discharge 24 hours a day, then the Maryland Department of the Environment (MDE) will need to approve the monitoring plan.
2. Page 3-1, Section 3.1, 4th bullet, and Page 5-3, Section 5.6 and Figures 5 and 6. The current design of settling/de-watering pools indicates that the tanks will be open. What measures are planned to prevent overflow of the tanks in the event of severe rainstorms?
3. Page 3-1, Section 3.2, 11th bullet and Page 7-1, Section 7.3, 2nd sentence. Please explain how the upstream manhole will be repaired.
4. Page 3-2, Section 3.4. This section should address Applicable or Relevant and Appropriate Requirements (ARARs) on sensitive environments, species, and habitats, sedimentation and erosion controls, wetlands impact and mitigation requirements, stormwater management, National Pollution Discharge Elimination System (NPDES) permitting and discharge limits, and the Controlled Hazardous Substances (CHS) and Resource Conservation and Recovery Act (RCRA) requirements regarding handling and disposal of the lead-contaminated sediment.
5. Page 3-2, Section 3.4, 1st paragraph, last sentence. Please clarify this statement by explaining how it applies to a removal action under the National Contingency Plan (NCP).
6. Page 4-1, Section 4.3.1, 1st sentence and page 4-2, Section 4.3.3, 1st sentence. There are two figures designated as Figure 2 in this document. Please clarify which Figure 2 corresponds to the narrative in these sections.
7. Page 4-2, Section 4.3.4. Please indicate whether a tarp will be placed over the excavated area at the end of each day. This was requested by Navy personnel, to control erosion at the work site, during the November 6, 1995 meeting at Indian Head.
8. Page 5-2, Section 5.2. The excavation dimensions are not clearly described in this section nor shown on Figures 2 and 4.

9. Page 5-2, Section 5.2, 2nd sentence. Please provide MDE with the December 1995 preconstruction sampling results described in this section.
10. Page 5-2, Section 5.2, 5th sentence. Please include a description of the anticipated management of the excavated sediments.
11. Page 5-2, Section 5.3, 3rd paragraph, last sentence. Please clarify whether "secondary 12,000 gallon storage pond" refers to the final holding pool shown in Figure 5.
12. Page 5-2, Section 5.3, 4th paragraph, 2nd sentence. The diversion of water around the excavation site needs to be coordinated with the MDE. The Environmental Restoration and Redevelopment Program (ERRP) can assist in coordinating with the Water Management Administration.
13. Page 5.3, last sentence. Please explain the procedure by which the removed section of the pipe will be characterized for off-site disposal.
14. Page 5-3, Section 5.7, 2nd paragraph. The MDE and EPA should be notified in writing when an off-site disposal facility is selected.
15. Page 5.3, Section 5.7, 4th paragraph. Copies of manifests should be provided in the appendix of the final removal report, along with the characterization sample results.
16. Page 6-1, Section 6.1. Water discharge must be managed in accordance with the current NPDES discharge permit.
17. Page 6-1, Section 6.1, 2nd paragraph, 1st bullet. The sump pit here is assumed to refer to an area upstream of the removal action. This sump pit and re-routing of the stream are not adequately described in this work plan.
18. Page 6-1, Section 6.2. Were predictions made on how long it will take for the sediments to settle out? Were grain size analyses conducted on sampled material? Will the different bag filters be adequate to filter out the sediments?
19. Page 6-1, Section 6.3, 2nd sentence. Before the filtered water can be discharged, it must be sampled for all NPDES parameters permitted for Outfall #87.
20. Page 6-1, Section 6.3, 3rd sentence. MDE does not concur that one water sample collected from the beginning of a batch can adequately represent all of the water in that one batch. During the batch run, the water will vary in the sediment load, the pH will change, and the filter media may become saturated or fail. Sampling of the water should be done at the end of a batch prior to discharge.

21. Page 6-2, last sentence on the page. It is MDE's understanding that the contractor agreed at the November 6, 1995 meeting to analyze the treated water samples both off and on site to determine if the on-site field screening method is comparable to a laboratory method. The results of the two different analyses were to be used to determine if on-site screening methods are adequate for characterizing the treated water.
22. Page 7-1, Section 7.1. Please explain how the "dual containment system" will be decontaminated.
23. Page 7-1, Section 7.3. Will the remaining pipe be visually examined for cracks, breaks, etc. before relining occurs?
24. Appendix A, page 1, 1st paragraph, last sentence. See comment #6.
25. Appendix A, page 1, 4th paragraph, 4th sentence. Please explain how contract personnel will have access to the Site, if needed, in the event of a failure of the water treatment unit.
26. Appendix D, page 1-1, Section 1.1, 2nd paragraph, 2nd sentence. Previous water samples have, in fact, found lead at levels greater than 0.082 mg/l at the outfall, IW87. Please clarify whether this sentence is referring to filtered water samples.
28. Appendix D, page 2-1, Section 2.2, 2nd paragraph. This section does not clearly explain where post-excavation sampling is to occur. Will the samples from the "floor" of the excavation be taken 5, 15, and 25 feet from the end of the pipe after or before the 70 feet of pipe is removed? Additionally, the areas of excavation should be shown on a figure. Please clarify what is meant by "short walls" and "long walls". Please state the exact number of post-excavation samples to be collected and show these sample locations on a figure. It is not clear whether confirmatory samples are being collected from the area of the pipe excavation.
29. Appendix D, page 2-1, Section 2.2.1. Please indicate what soils are to be sampled.
30. Appendix D, page 2-1, Section 2.3. Confirmatory samples using off-site laboratory methods should be used. This section does not adequately describe the sampling procedure of the Water Treatment System (WTS).
31. Appendix D, page 2-1, Section 2.3.1 and Section 2.3 and Section 6.3 on page 6-1. Please clarify the methodology and frequency of sampling and treated water.
32. Appendix D, page 5-3, Section 5.4, Table 5.1. Soil samples for total lead analysis do not require HNO₃ preservation.
33. Appendix D, page 6-1, Section 6.1. This section states that 10% of the WTS samples will be duplicates, but Section 3.0 on page 3-1 indicates that duplicates will be collected at a frequency of 5%. Please explain this discrepancy.

34. Appendix D, page 8-2, Section 8.3, 1st sentence. Table 2, which is referenced, does not appear in this Appendix.
35. Appendix D, page 8-2, Section 8.3, 3rd sentence, and Section 8.4, 5th sentence. "GC/MS" tuning is not applicable to total lead analysis.
36. Appendix D, Section 8.4, 5th sentence. Please clarify whether surrogate recoveries and internal standards data are justified for this removal action.
37. Figure 6, Detail A. The water diversion outlet structure has not changed since the last draft of the work plan. During the November 6, 1995 meeting, the Natural Resources Manager at Indian Head asked the contractor to place riprap around this structure in order to reduce erosional scouring of the stream channel. Please explain the reasons for ignoring his advice.