



DEPARTMENT OF THE NAVY

INDIAN HEAD DIVISION
NAVAL SURFACE WARFARE CENTER
101 STRAUSS AVE
INDIAN HEAD MD 20640-5035

5090
Ser 0952/67
13 Mar 96

Maryland Department of the Environment
Federal/NPL Superfund Division
Attn: Ms. Donna Lynch
2500 Broening Highway
Baltimore, MD 21224

Dear Ms. Lynch:

We are forwarding our responses to your comments of November 24, 1995, on our Installation Restoration (IR) Program Site Management Plan (SMP) of October 1995. Please be aware that the SMP is a "living" document which requires periodic updates as we progress through the IR program.

The next planned update to the SMP will be during the development of the Remedial Investigation Work Plan, which is scheduled to occur during fiscal year 1996. Appropriate changes will be made to the SMP at that time.

It is important to note that the SMP is a planning tool to assist with the scheduling and budgeting of all activities associated with our IR Program. Although all of your comments are valuable and add an additional perspective to IR issues, many of them are out of the scope of this planning tool. We do not want the SMP to grow too detailed and thus become too burdensome a document to use in this planning mission.

If you have any question or comments concerning this matter, please contact Mr. Shawn Jorgensen of my staff on (301) 743-6745. In addition, you may contact Mr. Shawn Phillips, our Remedial Project Manager from the Engineering Field Activity Chesapeake on (202) 685-3274.

Sincerely,

A handwritten signature in cursive script that reads "Susan P. Adams".

SUSAN P. ADAMS
Director, Environmental Division
By direction of the Commander

Encl:

- (1) Responses to MDE Comments
on SMP of Oct 95

Copy to:
EFACHES (Code 181SP)
EPA (D. Orenshaw)

RESPONSES TO MARYLAND DEPARTMENT OF THE ENVIRONMENT'S COMMENTS
ON THE SITE MANAGEMENT PLAN OF OCTOBER 1995

General Information

1. The Navy agrees that the MDE is no longer the Lead Regulatory Agency on the Indian Head Division, Naval Surface Warfare Center (IHDIIV-NSWC) because of the NPL status. No change in the SMP is required.
2. The Navy agrees that the SMP will need to be integrated with the FFA objectives and scope. No change in the SMP is required at this time.

Specific Comments

1. Concur. This will be changed to reflect current NPL status.
2. Concur. This will be changed to reflect current NPL status.
3. Concur. This will be changed to reflect the similarities of sites 6 and 25 to site 5.
4. Concur. A "Risk Assessment" bullet will be added beside the RI/FS box of Figure 1-2.
5. No clarification for this sentence is required. The Confirmation Study of 1985 confirmed the presence of mercury at Site 8 and considered it a potential threat to human health or the environment.
6. Concur. These paragraphs will be clarified in the next update.
7. Clarifying this sentence is out of the scope of the SMP. The information known about the presence of heavy metal contamination at site 12, or upgradient of site 12, is discussed in Section 2. More cannot be stated with the information available to the Navy at this time. Until the RI is conducted, we are unable to discuss what is contributing to the heavy metal contamination at this site.
8. Concur. The word "and" will be removed from the sentence.
9. Concur. Sections 1.3 and 1.4 will be placed directly after section 1.1.
10. Concur. "has presented" will be changed to "presents."

RESPONSES TO MARYLAND DEPARTMENT OF THE ENVIRONMENT'S COMMENTS
ON THE SITE MANAGEMENT PLAN OF OCTOBER 1995
(continued)

11. Concur. The sentence will be changed as recommended.
12. Concur. Figure 1-3 will be properly labeled.
13. This is out of the scope of the SMP. The information in this section came from the Initial Assessment Study of 1983, which is obviously dated. Additional research has shown that shapes (nose cones, etc.) containing thorium and used in training exercises were containerized along with the dirt and gravel that they were setting on. The amount of waste generated was one 55-gallon drum, which was temporarily stored in Building 901. As required by our Safety Department, the drum was moved to a remote location on-site shortly afterward, where it remained until it was removed for disposal in the state of Washington in February 1985. The following low level radiation readings are from the drum in question:

3 feet 0.02 MR Surface 0.25 MR Alpha 0

However, this data does not change the information on the actual "spill," if it was, in fact, a spill at all.

14. This comment is out of the scope of the SMP. The sampling of various media at each site will be addressed in future work plans for the RI/FS and site screening process. Both the EPA and the MDE will have the opportunity to review these plans prior to execution of the plans.
15. See response #14.
16. See response #14.
17. Concur. This concern may be addressed during future studies at this site.
18. Concur. Groundwater will be addressed at Site 12 during the RI/FS.
19. See response #14.
20. See response #14.

RESPONSES TO MARYLAND DEPARTMENT OF THE ENVIRONMENT'S COMMENTS
ON THE SITE MANAGEMENT PLAN OF OCTOBER 1995
(continued)

21. Concur. This sentence is unclear. After further examination of the Initial Assessment Study (NEESA, 1983), this site was referenced as site 4 from another Navy document, the Naval Shore Activity Disposal Site Fact Form (NSADSFF, 1980). This reference will be clarified. However, to date, we have been unable to locate this reference.

22. Concur, with clarification. The SMP and it's reference, the Phase II Site Inspection, state that there were low levels of volatiles and semi-volatiles in the creek adjacent to Site 39. The reports proceed to attribute these contaminants to Site 41, which is in close proximity to both Site 39 and the creek. The Navy is looking at both sites, from the perspective of their joint impact on Mattawoman Creek. Groundwater will also be examined in the immediate vicinity of Site 41.

23. See response #14.

24. The last sentence of this paragraph is incorrect and must be changed in the next update. The next step in the IR program will be the RI, not the Site Screening Process. Preparation of the work plan for the RI will begin this year (1996). See response #14.

25. Concur. A reference that background levels were extracted from literature and not from site specific determination will be added to the next document update.

26. See response #14.

27. The SMP does, to some extent, explain the tendencies that are demonstrated by certain levels of Cation Exchange Capacity (CEC) and Total Organic Carbon (TOC). We will refer this comment to our consultant firm for a summary of what the calculated values at this site indicate.

28. Concur. This will be added in the next update to the SMP.

29. This statement in the SMP is wrong. The source of the statement of lead being a concern from prior NPDES violations is undoubtedly misplaced in this section. The lead NPDES situation is the site mentioned in the previous section on Site 56. MDE's comment about TCE being the contaminant of concern is correct. We will most certainly make this correction in the next update to the SMP.

RESPONSES TO MARYLAND DEPARTMENT OF THE ENVIRONMENT'S COMMENTS
ON THE SITE MANAGEMENT PLAN OF OCTOBER 1995

(continued)

30. Concur. This will be updated in the SMP.

31. These two figures were in our copy of the document. Copies of these figures were provided, in person, to you on February 22, 1996. We will ensure all future updates contain all referenced figures.

32. Appendix C is in a separate binder. It was forwarded to you under letter 5090 Ser 0952/371 of 7 Dec 95.