MDE

MARYLAND DEPARTMENT OF THE ENVIRONMENT
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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

June 5, 1996

Mr. Shawn Jorgensen
Naval Surface Warfare Center
Indian Head Division
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, Maryland, OHM Remediation Services Corporation, May 8, 1996

Dear Mr. Jorgensen:

Enclosed are the Maryland Department of the Environment, Waste Management Administration's comments on the above referenced document.

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

Sincerely,

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

DAL:bjm

Enclosure

cc: Mr. Dennis Orenshaw, U.S. EPA
Mr. Shawn Phillips, 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, Maryland, OHM Remediation Services Corporation, May 8, 1996

SPECIFIC COMMENTS

1. Page 3-1, Section 3.2, last bullet and page 6-1, Section 6.0. The current design of settling/dewatering pools indicated that the tanks will be open. What measures are planned to prevent overflow of the tanks in the event of severe rainstorms?

2. 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.

3. Page 5-2, Section 5.3. Please explain the procedure by which the removed section of pipe will be characterized for off-site disposal.

4. Page 5-4, Section 5.8. Per discussions with the Maryland Department of the Environment (MDE) Water Management Administration, National Pollutant Discharge Elimination System (NPDES) program, the wastewater generated during this removal action must be analyzed for pH and total suspended solids if a chemical precipitate is used in dewatering the sediments.

5. Page 5-2, Section 5.4 and page 7-1, Section 7.3. Will the remaining pipe be visually examined for cracks, breaks, etc. before relining occurs?

6. Page 7-1, Section 7.1. Please explain how the water treatment system will be decontaminated.

7. Appendix D, Section 1.2. The estimated volume of excavated sediments in this Section does not match the estimated excavation volumes given in Section 5.5 on page 5-3. Please explain this discrepancy.

8. Appendix D, Section 2.2. This Section specifies that one composite sample will be taken every 25 feet within the excavated sediment trench for post-excavation sampling. The MDE understands from a meeting held on May 28, 1996 that this post-excavation sampling has been changed to three discrete samples taken every 20 feet for a total of 18 samples collected, and that these samples will be analyzed for total lead.

9. Page 5-2, Section 5.3, 5th sentence. Please indicate how the contaminated sediments removed from the lower section of pipe, that will be removed prior to pipe cleaning, will be contained within the staging area. These sediments are saturated at this end of the pipe, and it is not clear how these sediments will be contained on the "adjacent HDPE lined staging area."