



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

Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

July 23, 1997

Mr. Shawn Jorgensen  
Naval Surface Warfare Center  
Indian Head Division  
Attn.: Code 046, Building D-327  
101 Strauss Avenue  
Indian Head MD 20640-5035

RE: Draft Background Investigation Work Plan for Naval Surface Warfare Center, Indian Head and Stump Neck Annex, June 1997

Dear Mr. Jorgensen:

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

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

Sincerely,

A handwritten signature in cursive script that reads "Donna A. Lynch".

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

Enclosure

cc: Mr. Brent Meredith, EFACHES  
Mr. Dennis Orenshaw, U.S. EPA  
Mr. Rob Sadorra, EFACHES  
Mr. Richard Collins  
Mr. Robert DeMarco  
Ms. Hilary Miller

**MARYLAND DEPARTMENT OF THE ENVIRONMENT  
WASTE MANAGEMENT ADMINISTRATION**

Comments on

Draft Background Investigation Work Plan for Naval Surface Warfare Center, Indian Head and  
Stump Neck Annex, June 1997

**GENERAL COMMENTS**

1. The Maryland Department of the Environment (MDE) suggests that the Navy consider collecting background samples off of the Indian Head facility. Due to the nature of operations at Indian Head, samples representative of background are unlikely to be found on the facility.

**SPECIFIC COMMENTS**

1. Page 1-5, Table 1-1. This table does not list all of the Solid Waste Management Units (SWMU) at the Indian Head facility. Please revise this table.
2. Page 2-1, 1st bullet. Please provide the rationale for not collecting surface water samples as part of this study.
3. Page 2-5, Figure 2-1. Please clarify whether the background sampling locations were checked against the locations of all Installation Restoration sites, Corrective Action sites, and SWMUs at the facility.
4. Page 2-5, Figure 2-1. Please provide the rationale for not collecting sediment samples from Mattawoman Creek or the Potomac River. It will be useful to have background information on the sediments as there are several Installation Restoration sites which border the facility's shoreline.
5. Page 2-14, Sections 2.4.1 and 2.4.2. Please provide the rationale for proposing to analyze the background samples for Appendix IX parameters and for explosives.
6. Page 3-7, Section 3.1.4. MDE suggests that the Navy consider using well materials that are cleaned and prepackaged by the manufacturer in constructing the groundwater monitoring wells.
7. Page 3-9, Section 3.1.4.2, 3rd sentence. MDE suggests that the Navy follow the contractor's Standard Operating Procedure GH-12 when developing the groundwater monitoring wells. This procedure includes the measurement of water quality parameters, not just the turbidity of the groundwater, to determine when the monitoring wells have been properly developed.

8. Page 3-10, Section 3.1.4.4, 2nd paragraph. MDE suggests that the Navy use low-flow pumps instead of bailers to collect groundwater samples to reduce the loss of volatile organic compounds.
9. Page 3-12, Section 3.1.6.1. Please see comment #6.
10. Page 4-1, Section 4.1. 4th paragraph. Please clarify the previous background sampling that is proposed to be used in conjunction with this study.
11. Page 4-2, Section 4.2. Please discuss in detail the statistical procedures that will be used to analyze the background data.
12. Appendix A, page 1-3. The phone number for the site point of contact should be corrected.
13. Appendix A, page 2-5. See comment #12.
14. Appendix A, page 2-7. A figure showing the route to the closest hospital should be included in this section.
15. Appendix D, page 1-10, Table 1-4. Please note that the analysis for nitroglycerine should be conducted using SW846 method 8332.
16. Appendix E. Please provide the rationale for considering the data in this section to be background data.