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Parris N. Glendening
Governor

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Secretary

September 8, 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 Final Project Specific Remedial Investigation Work Plan, Naval Surface Warfare Center, Indian Head, May 1997.

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 contact me at (410) 631-3440.

Sincerely,

Donna A. Lynch

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

DAL:bjm

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 Final Project Specific Remedial Investigation Work Plan, Naval Surface Warfare Center, Indian Head, May 1997

SPECIFIC COMMENTS

1. Page 1-4, Section 1.4. Watershed designations should include all sites, Solid Waste Management Units, and Areas of Concern (AOC) at the Indian Head facility, not just the sites in the Remedial Investigation (RI) phase of work.

2. Page 1-5, Table 1-1. The Navy should also consider using the U.S. Environmental Protection Agency's (EPA) Soil Screening Levels (SSL) for transfer from soil to groundwater to screen for contaminants. Guidance on the use of SSLs has been recently published by the EPA (1997).

3. Page 3-23, 1st bullet. On a site visit with the Navy (August 14, 1997), Maryland Department of the Environment (MDE) personnel discovered that the drive points installed as part of the RI work at Site 12 were not properly located. The Navy can either abandon these locations and reinstall the drive points at the landfill/pond boundary as was planned, or the Navy can convert these drive points into permanent monitoring wells (must include an annular seal). The requirements for constructing groundwater wells can be found in the Code of Maryland regulations (COMAR) at Title 6, Subtitle 4, Chapter 4.

4. Page 3-22. The evaluation of whether or not modified method SW846 8330 is the appropriate method to conduct explosive analyses of media at Indian Head should be coordinated with EPA's Office of Analytical Services and Quality Assurance.

5. Page 4-7, Figure 4-2A. Please note that zinc and chromium concentrations in some of the sediment samples are also above Region III Biological and Technical Assistance Group (BTAG) screening levels for fauna; these values should be shown on this figure. Additionally, the concentration of nitroglycerin in sample 39DP02 is incorrect on this figure.

6. Page 4-21, Figure 4-3. The proposed sampling locations will duplicate previous investigations at this site. The MDE suggests that the Navy consider a grid or transect approach at Site 39 to better define the extent of contamination.

7. Page 11-1, Section 11.1. MDE was told by Naval personnel that recent renovations at Building 856 uncovered mercury contamination in lead-lined concrete troughs. These troughs drain laboratory sinks into storage tanks. As there is a potential for release to the environment, the Navy should consider expanding the scope of work at Site 47 to include these recently discovered areas.

8. Page 11-5, 2nd paragraph, 2nd sentence. Please justify the use of action levels at this stage of the Comprehensive Environmental Response, Compensation and Liability Act process.

9. Page 11-5, 4th paragraph, 3rd sentence. See comment #8.

10. Page 11-5, 5th paragraph. According to the Phase 2 Site Inspection (May 1993), soil 'probings' completed to an eight foot depth did not find any evidence of the former limestone pit. As stated on page 11-1, Section 11.1, the concrete pad may cover the limestone pit. It may be necessary to take soil samples underneath of the concrete pad.

11. Page 11-7, Figure 11-2. All of the contaminants detected above Region III Risk-Based Concentrations (RBC) are not shown on this figure as stated. Please revise.

12. Page 11-10, Section 11.5, 1st paragraph, 1st sentence. This statement is inaccurate. EPA Region III screening levels were exceeded in a number of samples analyzed for in the site investigation. Please revise.

13. Page 11-10, Section 11.5, 1st bullet. The disposal pit has been described as being 4 x 6 feet in area. Is there any information on the depth of this pit? Although soil 'probings' went down to a depth of eight feet, no soil samples over one foot deep were analyzed for contamination. If historically the pit was known to be deeper than one foot, the Navy should consider taking subsurface samples.

14. Page 11-10, next to last bullet. This information is incorrect. A drainage swale/stream exists at this site.

15. Page 11-10, last bullet. Temporary groundwater monitoring wells are adequate for screening purposes only. If contamination is detected, permanent monitoring wells should be installed.

16. Page 11-11, Table 11-2. The Region III RBC screening levels for transfer from soil to groundwater should be included in your evaluation.

17. Page 13-9, Section 13.4, 3rd sentence. Please provide the evidence that there are no leaks in the underground sewer system.

18. Page 14-5, Section 14.2, 4th paragraph, last sentence. Mercury and cadmium levels in soil samples exceed the EPA Region III soil screening levels for transfer from soil to groundwater. Please revise this sentence.

19. Page 14-9, Section 14.4. This section is not accurate. Site 50 is not located in a building but underneath a building. The Navy should reevaluate the need for an ecological risk assessment.

20. Page 14-9, Section 14.5. Considering that mercury and solvents were discharged through the laboratory sinks in Building 103 to the soil underneath for over 80 years, it seems unreasonable that mercury is not considered a preliminary contaminant of concern at this site. In addition to the proposed surface soil samples, MDE suggests that the Navy consider collecting soil borings and groundwater samples at this site.

21. Page 15-5, 2nd paragraph, last sentence. Please specify the outfall to which stormwater from this site discharges.

22. Page 15-7, Figure 15-2. It would be useful if the sanitary sewer and storm drain systems were shown on this figure.

23. Page 15-7, Figure 15-2. The contaminants and their concentrations detected in sample #53DM02 are incorrectly listed on this figure. Please revise.

24. Page 16-6, Section 16.3, 2nd and 3rd paragraphs. The Navy has identified this building as a potential source of contamination. MDE does not believe that the EPA Region III RBC for soils (industrial) is appropriate to screen for contaminants at this site. Appropriate screening values should be derived for each type of material and proposed exposure scenarios. MDE believes that the following exposure pathways should be considered in the human health risk assessment for this site: inhalation, incidental ingestion, and dermal contact.

25. Page 16-7, Figure 16-2. The locations of previous samples taken at this site are difficult to determine on this figure due to the scale. Please revise this figure.

26. Page 17-7, Figure 17-2. See comment #25.

27. Page 17-9, Section 17.3, 2nd and 3rd paragraph. See comment #24.

28. Page 18-2, Table 18-2. Samples taken at this site should be analyzed for Target Compound List parameters and Target Analyte List parameters, and explosives.

29. Page 18-5, Section 18.2, 5th paragraph. The removal action at this site has been completed. Please review this paragraph to reflect the completed removal action.

30. Appendix A, page 7-1. While sampling the IR sites where mercury contamination is known, particularly Sites 50, 53, 54, and 55, air monitoring should be conducted to protect the workers.

31. Appendix B, page 1-3, Table 1-1. Please add the explosives and their detection limits to this table.

32. Appendix B, page 1-3, Table 1-1. Many of the contract required detection limits for both aqueous and solid samples have higher values than the screening levels that the Navy proposes to use in the RI work. Detection levels need to be selected so that these data are appropriate for the risk assessment.