



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

March 11, 1998

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: Engineering Evaluation/Cost Analysis for IR Site 57, Former Drum Loading Area, Building 292, Indian Head Division, Naval Surface Warfare Center, February 1998

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
Remedial Project Manager
Federal/NPL Superfund Division

cc: Mr. Brent Meredith, EFACHES
Mr. Dennis Orenshaw, U.S. EPA
Mr. Richard Collins
Ms. Hilary Miller
Ms. Shari Wilson

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

Comments on:

Engineering Evaluation/Cost Analysis for IR Site 57, Former
Drum Loading Area, Building 292, Indian Head Division,
Naval Surface Warfare Center, February 1998

GENERAL COMMENT

The Maryland Department of the Environment recommends that the Navy utilize the recent EPA guidance concerning soil screening levels. Two recent EPA guidance documents are: *Soil Screening Guidance*, April 1996 and *Soil Screening Guidance Technical Background Document*, May 1996.

SPECIFIC COMMENTS

1. Page 2-11, Section 2.3 and Appendix A, Attachment A.1. It is inappropriate to calculate a removal action goal for the trichloroethene (TCE)-contaminated groundwater based on the NPDES permitted discharge at outfall IW-80. The NPDES program permits point source discharges. The TCE-contaminated groundwater at Site 57 that naturally flows into the stormwater collection system and then to the outfall is not considered a point source discharge (EPA guidance, April 1988). Remedial action cleanup goals for groundwater should be determined after the remedial investigation is completed.
2. Appendix A, Attachment A.5. This attachment concerning preliminary calculations is not needed, as natural attenuation was not evaluated in this document.