



**DEPARTMENT OF THE NAVY**

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

5090

Ser 046/91

30 Jun 00

Mr. Elmer Biles  
6315 Indian Head Highway  
Indian Head, MD 20640

Dear Mr. Biles:

We are writing in response to your letter of June 16, 2000, concerning the Installation Restoration (IR) Program draft final Remedial Investigation (RI) Work Plan for IR Sites 11 (Caffee Road Landfill), 13 (Paint Solvents Disposal Ground), 17 (Discarded Metal Parts Along Mattawoman Creek Shoreline), 21 (Bronson Road Landfill), and 25 (Hypo Discharges from Building 588) dated May 2000. We appreciate you taking the time to review this document and provide additional comments to us.

Your first comment involves modifying maps associated with the work plan to reflect active and abandoned wells. This is partially correct. As stated in our letter to you of June 1, 2000, we plan to add active wells to the maps in the work plan, if active wells are located within the existing site maps. In addition, if no active wells are within the boundaries of the existing site maps, then we will place a notation on the map and in the text of the document stating the distance and direction to the nearest active well.

Your second comment concerns sampling. All of the sampling performed for the IR Program is done according to EPA methods and procedures. Your example suggests that sample results would be different following a heavy rain or "other flushing of the area" prior to the drawing of the sample. Stormwater samples taken at the onset of a storm event measure the worst case, first flush conditions. However, from a human health and ecological risk perspective, we are concerned about steady state conditions in the surface water bodies. Although, we do not coordinate sample taking with rainfall events, we do attempt to avoid them.

5090

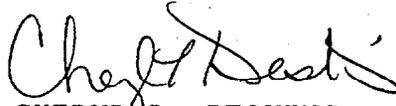
Ser 046/91

In addition, if samples are taken in streams, such as Industrial Wastewater Outfalls, the flow is measured. Therefore, the rate of a chemical flowing in the stream can be calculated, such as pounds per day. This rate is independent of flow conditions in the stream.

Sediment and soil samples are a little different. These samples are analyzed based on dry weight. Many contaminants, such as inorganics (metals) and pesticides, are bound to the soil and are not easily flushed. The volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs), such as solvents, are flushed over long periods of time. Therefore, the levels in soils will decline from repeated rainfall, as well as volatilization, biodegradation, etc. However, there is no measurable difference between samples collected before a rainfall event and immediately after, except in moisture content.

We hope that this response adequately addresses your concerns. If you have any additional comments or questions, please contact Mr. Shawn Jorgensen of my staff on (301) 744-2263.

Sincerely,



CHERYL L. DESKINS

Director, Waste Management  
and Prevention Division

By direction of the Commander

Encl:

(1) E Biles ltr of 16 Jun 00

Copy to:

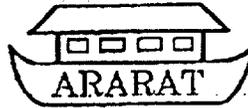
RAB Members

Interested Parties

CH2M Hill (A. Estabrook)

TetraTech NUS (G. Latulippe)

ATSDR (D. Jackson)



6315 Indian Head Highway  
Indian Head, Maryland 20640

FAX 301 744 4180  
Ms. Cheryl L. Deskins, Director  
Waste management and Prevention Division  
Indian Head Division  
Naval Surface Warfare Center  
101 Strauss Ave.  
Indian Head, MD 20640-5035

June 16, 2000

RE: Draft Final Remedial Investigation Work Plan for Sites 11, 13, 17, 21 and 25

Dear Ms. Deskins:

Based on the comments made by Mr. Jorgensen at last weeks RAB meeting I understand that the maps associated with the above Work Plan will be modified to reflect any abandoned or operating wells.

Since the samples identified to be taken at many of the sites will involve both soil and water samples and since no specifications are included on the timing for the taking of these samples some procedure must be identified so that samples will not be taken when they could possible distort or nullify the test results of the sampling procedure. As an example, do the procedural steps allow for a time interval following a heavy rain or other flushing of the area prior to the drawing of the sample?

I have no other comments at this time.

Sincerely,



Elmer S. Biles  
301 283 6298