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July 27, 2000

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Commander
EFA Chesapeake
Code 1811, Mr. Rob Sadorra
Washington Navy Yard, Building 212
1314 Harwood St, SE
Washington Navy Yard, DC 20374

Dear Rob:

Subject: Navy CLEAN II Program
Contract N62470-95-D-6007
Contract Task Order 0122
Final Work Plan for Sites 11, 13, 17, 21, and 25
NSWC Indian Head Division, Indian Head, MD

CH2M HILL is pleased to submit two copies of the above-referenced document. The document has been directly distributed as listed below. If you have any questions, please feel free to call.

Sincerely,

Anne Estabrook, P.E.
Activity Manager

cc: Lee Anne Rapp/Code 18312/LANTNAVFACENGCOM (cover letter only)
Shawn Jorgensen/IHDIV-NSWC (eight copies)
Curtis DeTore/MDE (one copy)
Dennis Orenshaw/USEPA (two copies)
Cindy Crane/HydroGeoLogic (one copy)
Noelle Cuti/File/CH2M HILL/WDC (cover letter only)

RESPONSE TO COMMENTS ON DRAFT FINAL WORK PLAN FOR SITES 11, 13, 17, 21, AND 25

Comment #	Location	Comment	Response
Curtis DeTore/MDE			
1	Section 3.3, page 3-3, 2 nd paragraph, 2 nd sentence	<ul style="list-style-type: none"> Table 3-2 Text states that it is Navy policy to evaluate hypothetical future residential use, but Table 3-2 shows only an off-site residential scenario evaluated for groundwater exposure. Please include future on-site residential use exposures for surface soil, surface water, sediment and groundwater. The results of these evaluations can be included as an appendix to the Remedial Investigation Report. 	<ul style="list-style-type: none"> The future off-site residential scenario will be replaced by the future on-site residential scenario. The future residential scenario will be evaluated for groundwater and a combined surface and subsurface soil evaluation. The surface water and sediment will be evaluated for a recreational user and not a residential user.
2	Section 3.4.2.1, page 3-6, 5 th paragraph, last sentence	<ul style="list-style-type: none"> For consistency throughout the document, please include the genus/species name for white-tailed deer in this sentence. 	<ul style="list-style-type: none"> Scientific convention is to list the Latin genus/species name along with the common name only at the first reference within a document, and to list only the common name thereafter. However, in response to this comment Latin names have been added throughout the document.
3	Table 3-5	<ul style="list-style-type: none"> This table inaccurately references Figure 3-2. All mentions of Figure 3-2 should be replaced with Figure 3-3. 	<ul style="list-style-type: none"> Made correction
4	Section 4.3, page 4-3, 2 nd paragraph, 3 rd sentence	<ul style="list-style-type: none"> See comment number one. 	<ul style="list-style-type: none"> See 1 above
5	Section 4.4.2.1, page 4-5, 1 st paragraph, 3 rd and 4 th sentences	<ul style="list-style-type: none"> For consistency throughout the document, please include the genus/species name for red maple, American holly and white oak in these sentences. 	<ul style="list-style-type: none"> Species name added
6	Section 4.5, page 4-7, 1 st paragraph, 3 rd sentence	<ul style="list-style-type: none"> Text states that visual and photoionization detector inspection will be used to identify the most contaminated interval of each core for sampling. Please include a discussion of what will be the 	<ul style="list-style-type: none"> Added the following discussion: "If the PID readings are consistent or if there are no PID detections then the sample will be taken at the soil/groundwater interface. However, if groundwater was not encountered then

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Comment #	Location	Comment	Response
		<p>procedure if contamination within the core is found to be homogeneously distributed.</p> <ul style="list-style-type: none"> Also include a discussion of the sampling procedure to be followed if the core shows no evidence of contamination. 	<p>the field personnel will rely on visual evidence to decide where to sample."</p>
7	Section 5.3, page 5-3, 1 st complete paragraph, 3 rd sentence, Table 5-1	<ul style="list-style-type: none"> See comment number one. 	<ul style="list-style-type: none"> See 1 above
8	Section 5.4.2.1, page 5-5, 2 nd paragraph, last sentence	<ul style="list-style-type: none"> For consistency throughout the document, please include the genus/species name for wild rye and rose mallow in this sentence. 	<ul style="list-style-type: none"> Species names added
9	Section 5.4.2.1, page 5-5, 3 rd paragraph, 1 st and 3 rd sentences	<ul style="list-style-type: none"> For consistency throughout the document, please include the genus/species name for black locust, sweet gum and wild rye in these sentences. 	<ul style="list-style-type: none"> Species names added
10	Section 5.5, page 5-6, 1 st paragraph, 1 st sentence	<ul style="list-style-type: none"> This sentence should be revised to read "...and to determine whether the <u>drums and or their contents</u> contaminated the <u>surface/subsurface soil</u> and <u>groundwater in the surrounding area.</u>" 	<ul style="list-style-type: none"> Made correction
11	Section 6.3, page 6-5, 1 st complete paragraph, 3 rd sentence, Table 6-3	<ul style="list-style-type: none"> See comment number one. 	<ul style="list-style-type: none"> See 1 above
12	Section 6.4.2.1, page 6-7, 1 st paragraph,	<ul style="list-style-type: none"> For consistency throughout the document, please include the genus/species name for black locust, cattails and American holly in these sentences. 	<ul style="list-style-type: none"> Species names added

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Comment #	Location	Comment	Response
	3 rd , 5 th and 7 th sentences		
13	Section 6.4.2.3, page 6-7, 3 rd paragraph, 1 st sentence	<ul style="list-style-type: none"> This sentence should be revised to read "... (illustrated on Figure 6-2)..." 	<ul style="list-style-type: none"> Made correction
14	Section 7.1, page 7-1, 3 rd paragraph	<ul style="list-style-type: none"> Please include a description of the types of waste stored and any containment that exists at the Building 588 concrete pad. Include in this discussion a description of drainage pathways for the concrete pad. 	<ul style="list-style-type: none"> Removed last paragraph in Section 7.1 and replaced with the following paragraph: "Building 588 has a temporary waste accumulation area. The concrete pad, which is located on the southwest corner of the building, is currently used as a satellite accumulation area for the storage of non-explosive hazardous waste, i.e., waste acetone. (Secondary containment is provided when the site is used, i.e., a drum in a drum or a mobile secondary containment pad with cover is used). However, prior to 1996, the concrete pad held a dumpster which was used for the storage of solid explosive hazardous waste. Drainage in the pad area is directed to the south." This paragraph is based on Shawn Jorgensen's Comment 40.
15	Section 7.3, page 7-4, 2 nd paragraph, 3 rd sentence, Table 7-3	<ul style="list-style-type: none"> See comment number one. 	<ul style="list-style-type: none"> See 1 above
16	Section 7.4.2.1, page 7-6, 1 st paragraph, 2 nd , 3 rd and 5 th sentences	<ul style="list-style-type: none"> For consistency throughout the document, please include the genus/species name for white oak, red oak, chestnut oak, American holly and cattails in these sentences. The acronym "dbh" needs to be defined and added 	<ul style="list-style-type: none"> Species names added. The term "dbh" defined and added to acronym list.

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Comment #	Location	Comment	Response
		to the acronym list.	
17	Section 7.5, page 7-15, 1 st bulleted point, 1 st sentence, Figure 7-3	<ul style="list-style-type: none"> This figure correctly depicts 17 surface soil sample locations as agreed upon during one of our partnering meetings. The text stated that 15 surface soil samples will be taken and that their locations are shown on this figure. Please change the text to accurately describe the figure in the final version of the document. 	<ul style="list-style-type: none"> Made correction
18	Section 7.5, page 7-15, 3 rd bulleted point, 1 st sentence, Figure 7-3	<ul style="list-style-type: none"> This figure correctly depicts seven subsurface soil sample locations as agreed upon during one of our partnering meetings. The text states that eight subsurface soil samples will be taken and that their locations are shown on this figure. Please change the text to accurately describe the figure in the final version of the document. 	<ul style="list-style-type: none"> Made correction
Shawn Jorgensen/IHDIV-NSWC			
19	General	<ul style="list-style-type: none"> Need a list of references, i.e., page 1-3 Section 1.1.1 refers to Parsons 2000, but nowhere can I find what that document is. 	<ul style="list-style-type: none"> Added a reference section for the document (see Section 8).
20	General	<ul style="list-style-type: none"> Please ensure that the number of samples to be taken as described in the text for each site (Sections 3.5, 4.5, 5.5, 6.5, and 7.5) agree with those shown in the tables (Tables 3-4, 4-4, 5-2, 6-5, 7-5) and the figures (Figures 3-3, 4-3, 5-2, 6-3, 7-3). 	<ul style="list-style-type: none"> Number of samples in text, figures, and tables were cross checked for consistency to ensure that there was agreement. Text, figures, and tables were changed as needed.
21	General	<ul style="list-style-type: none"> If an active potable well is within the site map, then we will place the well location on the map. However if the nearest potable well is outside of the site map, then: 1) you will put a note on the map stating that the nearest well, Well #XX, is located YYYY feet NW, 	<ul style="list-style-type: none"> A note was added to the bottom of the existing conditions figure for Sites 11, 13, 17, and 21 to document the distance to the nearest potable water well. The nearest potable water well to Site 25 was within the site map so it was added to the existing

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		SSE, etc., from the site; and 2) you will add this statement to the text of the document.	<p>conditions figure.</p> <ul style="list-style-type: none"> Notes were added to the text that indicate the distance to the nearest potable water well for each site.
22	Page v	<ul style="list-style-type: none"> BTAG - Biological Technical Assistance Group COC - I hope that this will not get confused with Chemical of Concern COPL - Should be COPC 	<ul style="list-style-type: none"> Made corrections
23	Page vi	<ul style="list-style-type: none"> For consistency, please use caps for SVOCs, SOP, and TAT. 	<ul style="list-style-type: none"> Made corrections
24	Page 1-8	<ul style="list-style-type: none"> Federal Status column, Carolina satyr row. For consistency, change "Ns" to "NS". 	<ul style="list-style-type: none"> Made correction
25	Section 1.3, page 1-9, last paragraph of section	<ul style="list-style-type: none"> Change "Advisory" to "Assistance" in BTAG. 	<ul style="list-style-type: none"> Made correction
26	Page 1-15, Table 1-3, page 6 of 6	<ul style="list-style-type: none"> Under Groundwater, Drinking Water MCLs, cyanide and lead, what are the "c" and "f" for? 	<ul style="list-style-type: none"> Meant to indicate tap water action levels for Copper and Lead. Removed <i>c</i> and <i>f</i> superscripts from Cyanide and Lead. Added (<i>T</i>) note next to the Copper and Lead MCL value. This note was already defined in the note legend at the bottom of the table but was not used.
27	Page 1-15, Next to last line in notes	<ul style="list-style-type: none"> Please change "th4e" to "the". 	<ul style="list-style-type: none"> Made correction
28	Section 3.1, page 3-1, 2 nd paragraph, last sentence	<ul style="list-style-type: none"> Where did this information come from? The material that was removed was part of normal operations, i.e., decon minutely explosive contaminated material by burning and remove the remaining metal (to scrap yard of off-site for recycling). 	<ul style="list-style-type: none"> This information came from the Phase 2 RFA. Since it can not be confirmed the sentence was deleted.
29	Page 3-2, Figure 3-1.	<ul style="list-style-type: none"> Need to expand the sample area to include area around Building 24. 	<ul style="list-style-type: none"> Six surface soil samples were added around Building 24. Refer to Figure 3-3 for their location.
30	Section 3.3,	<ul style="list-style-type: none"> Please change this to read the "access IS restricted by 	<ul style="list-style-type: none"> Made correction

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Comment #	Location	Comment	Response
	page 3-4, 1 st paragraph, 2 nd sentence.	signs, but not by a fence."	
31	Page 3-5, Table 3-2.	<ul style="list-style-type: none"> Why would the media for current and future Industrial Workers and Trespasser/Visitor be different (surface only vs. surface/subsurface)? 	<ul style="list-style-type: none"> USEPA Region III assumes that under the future scenario, the site soil will have been disturbed thus causing the subsurface soil to become surface soil. Therefore, under the future scenario, an individual will be exposed to a combination of surface and subsurface soil.
32	Section 3.4.2.1, page 3-6, 4 th paragraph, 1 st sentence.	<ul style="list-style-type: none"> Please change "Olson" to "Olsen". Please do this throughout the document 	<ul style="list-style-type: none"> Made corrections
33	Section 4.1, page 4-1, 1 st sentence.	<ul style="list-style-type: none"> This statement is misleading. Building 870 didn't cease being a paint shop until 1999. However, disposal practices changed in 1979. 	<ul style="list-style-type: none"> Changed 1979 to 1999 in the text.
34	Page 4-3, Table 4-1, note 2.	<ul style="list-style-type: none"> What is ether alcohol? Also, please change I,I,I-trichloroethane to 1,1,1-trichloroethane. 	<ul style="list-style-type: none"> This Table was taken from the IAS, and ether alcohol was not defined. Made correction to 1,1,1-TCA.
35	Section 4.3, page 4-3, 3 rd paragraph, 2 nd sentence.	<ul style="list-style-type: none"> Saying the site is "not restricted" for trespassers is not entirely correct. A fence exists at the shoreline of the Mattawoman Creek in this area. 	<ul style="list-style-type: none"> Changed sentence to read: "The trespasser adult and adolescent are included in the evaluation because access to the site is not entirely restricted (though a fence does exist along Mattawoman Creek in the vicinity of the site).
36	Page 4-4, Table 4-2.	<ul style="list-style-type: none"> See comment from page 3-5. 	<ul style="list-style-type: none"> USEPA Region III assumes that under the future scenario, the site soil will have been disturbed thus causing the subsurface soil to become surface soil. Therefore, under the future scenario, an individual will be exposed to a combination of surface and subsurface soil.
37	Section 5.3,	<ul style="list-style-type: none"> Please add "except by signs" between "is not 	<ul style="list-style-type: none"> Made correction

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Comment #	Location	Comment	Response
	page 5-3, last paragraph, 2nd sentence	restricted" and "from Mattawoman Creek."	
38	Section 6.1, page 6-1 1st paragraph, 6th sentence.	<ul style="list-style-type: none"> Please change "IHDIV-NSWC" to "station". 	<ul style="list-style-type: none"> Made correction
39	Section 6.3, page 6-5, last paragraph, 2nd sentence.	<ul style="list-style-type: none"> Please add that shoreline of the Mattawoman Creek is either fenced or contains steep slopes, so trespassing would be unlikely, but not impossible. 	<ul style="list-style-type: none"> Changed sentence to read: "The trespasser adult and adolescent are included in the evaluation because although the shoreline of Mattawoman Creek is either fenced or contains steep slopes, trespassing would be unlikely, but not impossible."
40	Section 7.1, page 7-1, last paragraph.	<ul style="list-style-type: none"> This paragraph is incorrect, although it may have been correct in 1983 when the IAS was written. Therefore, please remove it. However, for your information, the following paragraph more accurately describes the situation: "Building 588 has a temporary waste accumulation area. The concrete pad, which is located adjacent to the building, is currently used as a satellite accumulation area for the storage of non-explosive hazardous waste (waste acetone. Secondary containment is provided when the site is used, i.e., a drum in a drum or a mobile secondary containment pad with cover is used). However, prior to 1996, the concrete pad held a dumpster which was used for the storage of solid explosive hazardous waste." 	<ul style="list-style-type: none"> See 14 above
41	Section 7.3, page 7-4, 3rd paragraph, 2nd sentence.	<ul style="list-style-type: none"> Please add that shoreline of the Mattawoman Creek is either fenced or contains steep slopes, so trespassing would be unlikely, but not impossible. 	<ul style="list-style-type: none"> See 39 above

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42	Page 7-5, Table 7-3.	<ul style="list-style-type: none"> Please see comment from page 3-5. 	<ul style="list-style-type: none"> USEPA Region III assumes that under the future scenario, the site soil will have been disturbed thus causing the subsurface soil to become surface soil. Therefore, under the future scenario, an individual will be exposed to a combination of surface and subsurface soil.
Heidi McArthur (Comments to Draft Report)			
43	Table ES-1	<ul style="list-style-type: none"> Site 11: Will there eventually be test pits dug to determine landfill perimeter? Site 21: Are four ground water samples enough for the whole area? Site 25: The ground water maybe very deep in this area for sampling, so should the installation of wells be held off until we determine what amount of silver is present and if the silver was capable of migrating to the ground water table. 	<ul style="list-style-type: none"> Response to Site 11: No test pitting is planned but if the soil borings are inconclusive we may opt to do this at a later time. Response to Site 21: Four wells are adequate for this phase. If we discover contamination then we might want to add additional wells. Response to Site 25: A phased approach is planned.
44	Page 1.1, Last Paragraph.	<ul style="list-style-type: none"> There are IR sites on Stump Neck too. 	<ul style="list-style-type: none"> Changed sentence to read: "Investigation of the Stump Neck Annex is being conducted through a Resource Conservation and Recovery Act (RCRA) Corrective Action and the IR program."
45	Page 1.1.1, First Paragraph.	<ul style="list-style-type: none"> During the large gun testing the shots were suppose to reach Stump Neck as part of the test (there is an old target over there). 	<ul style="list-style-type: none"> Changed sentence to read: "The property provided a safety buffer for the testing of larger naval guns that were tested by firing into the Potomac River or at Stump Neck."
46	Page 1.1.1, 3 rd and 4 th Paragraph	<ul style="list-style-type: none"> Ordnance is spelled wrong. 	<ul style="list-style-type: none"> Made correction.
47	Table 1-5	<ul style="list-style-type: none"> Site 11: Were any samples taking during the limited investigation? 	<ul style="list-style-type: none"> No, no samples were taken during the limited investigation at Site 11.
48	Page 1.6	<ul style="list-style-type: none"> Shawn's phone numbers are wrong. 	<ul style="list-style-type: none"> Made correction.
49	Page 2.3.2	<ul style="list-style-type: none"> Who is the FOL? 	<ul style="list-style-type: none"> Made correction
50	Page 3.1,	<ul style="list-style-type: none"> "extended the shoreline into the Mattawoman 	<ul style="list-style-type: none"> Made correction

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Comment #	Location	Comment	Response
	First paragraph	Creek"	
51	Page 3.3, 3 rd paragraph.	<ul style="list-style-type: none"> Just in case the RAB members freak out, there are signs posted on the riverside restricting access to the Activity. 	<ul style="list-style-type: none"> Made correction.
52	Table 3-3	<ul style="list-style-type: none"> Would a turtle be considered an aquatic/wetland omnivore and if so could we use it a receptor instead of a raccoon. Anne, I spoke to Jeff and he says a raccoon is a better receptor because it is further up the food chain (raccoons eat turtles). 	<ul style="list-style-type: none"> No change necessary.
53	Page 3.5	<ul style="list-style-type: none"> Will the waste sampling occur before the subsurface soil, so that the waste layer can be identified? 	<ul style="list-style-type: none"> The waste sampling and the subsurface soil sampling will occur at the same time. The boring will encounter the waste layer first and a waste sample will be taken. Once the waste layer is fully penetrated a subsurface soil sample will be taken from under the waste layer. This should be the area of subsurface soil most affected by the leachate from the waste layer.
54	Figure 3-3	<ul style="list-style-type: none"> The storm water detention pond looks like it is part of Caffee Road and it isn't. You are going to remove labeled. 	<ul style="list-style-type: none"> Made correction.
55	Table 4-1	<ul style="list-style-type: none"> Could arsenic be a contaminant too? It has been found in some paints used on the Activity. 	<ul style="list-style-type: none"> Yes. We are testing for TAL metals which includes arsenic. It was not addressed in the table since we took it directly from the IAS.
56	Table 4.3	<ul style="list-style-type: none"> Is there a reason the terrestrial carnivore receptor is a gray fox in one site assessment and a red fox in another? The red fox is more prevalent on the Activity. 	<ul style="list-style-type: none"> Gray or red fox were selected on a site-specific basis, based on our current knowledge of the habitat and the preferences of these two species. In the larger sense, it won't matter. A fox, whether red or gray, is used to represent the terrestrial mammalian carnivore. If the concentrations of bioaccumulative contaminants are very high, the evaluation should show a risk for either one. Based on the phrasing of the question, gray fox

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			are present on the Activity. As such, the gray fox is an appropriate receptor, even though less common.
57	Page 4.5	<ul style="list-style-type: none"> Should TPH be sampled for in the soil? Background information stated that kerosene could have been dumped. Can a photoionization detector (PID) detect any type of a petroleum constituent? 	<ul style="list-style-type: none"> This topic was discussed at the partnering meeting. It was decided that TPH analysis was not necessary since we're testing for volatiles which would detect petroleum related contaminants, i.e., BTEX. Yes. The PID will detect any volatile fraction of petroleum contaminants.
58	Table 4-5	<ul style="list-style-type: none"> In Table 4-4 the total number of surface soil samples to be taken is 9, but in Table 4-5 it states only 7 will be taken. 	<ul style="list-style-type: none"> No. Table 4-5 states that two samples will be taken from EACH of the drainage swales so the total is nine.
59	Page 5.1, Last Paragraph	<ul style="list-style-type: none"> Should we change non-explosive to something else because we are not sure all drums do not have explosive contamination. 	<ul style="list-style-type: none"> Made correction.
60	Table 6-1	<ul style="list-style-type: none"> I don't think the building locations of the origin of material are correct for asbestos and paint sludge. 	<ul style="list-style-type: none"> Made correction.
61	Figure 6-3	<ul style="list-style-type: none"> Why aren't any samples being taking around the pond area. 	<ul style="list-style-type: none"> A surface soil sample has been added near the pond.
62	Page 7.1, Last Paragraph	<ul style="list-style-type: none"> "Building is not presently a temporary waste accumulation area". It is an industrial building. Explosive operations are taking place there. 	<ul style="list-style-type: none"> See 14 above
HydroGeoLogic			
63	General	<ul style="list-style-type: none"> Why will TOC be measured in the surface soil samples but not in the subsurface soil samples? 	<ul style="list-style-type: none"> TOC information is needed for the eco risk assessment which is concerned with surface soil only.
64	General	<ul style="list-style-type: none"> In Section 3.1.2 of the Master Work Plan, that document discusses the use of Bioconcentration Factors to estimate fish tissue concentrations of contaminants of concern. Sites 11 and 17, evaluated together, have a complete exposure pathway for surface water. Table 3-2 and Table 5-1 list 	<ul style="list-style-type: none"> Will add to Sites 11 and 17

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		recreational adult and child users as potential receptors for contaminants in surface water. It is not clear from the Site Specific Work Plan if the ingestion of fish caught in Mattawoman Creek will be considered in the risk analysis.	
65	General	<ul style="list-style-type: none"> On Page 3-6 of the Master Work Plan, that document states "SSLs will be used to screen out chemicals detected at insignificant concentrations and to justify the elimination of the inhalation exposure pathway, which is comprised of the generation of fugitive dust and volatile emissions." The Site Specific Work Plan presents the SSLs in Table 1-3, but does not mention the use of SSLs in the subsequent sections on Human Health Risk Assessment. Please include a discussion of the use of SSLs in the relevant sections. 	<ul style="list-style-type: none"> Will revise accordingly.
66	General	<ul style="list-style-type: none"> On Page 3-7 of the Master Work Plan, that document states "conventional statistical methods (e.g., Bartlett's T-test, etc.) will be employed to compare site concentrations to background concentration if site-specific (or Base-wide) background data are available." Are enough background samples proposed to perform this statistical comparison? In the Site Specific Work Plan, please include a discussion of this statistical analysis stipulated by the Master Work Plan. 	<ul style="list-style-type: none"> Per current USEPA guidance, background concentrations will not be used for selecting COPCs or for determining site risks initially. After site risks are calculated and an unacceptable risk is determined, background data can be used in the risk evaluation.
67	General	<ul style="list-style-type: none"> When referring to the installation, "station" is sometimes capitalized and other times lower case throughout the document. Please edit the document to ensure consistency in capitalization. 	<ul style="list-style-type: none"> Changed to read IHDIV-NSWC throughout.
68	Page 1-2, Figure 1-1	<ul style="list-style-type: none"> This figure identifies the cities within this region. The arrow for the "Indian Head" identifier should point toward the circle northeast of the Station, instead of pointing to the Station itself. The circle 	<ul style="list-style-type: none"> Figure was borrowed from a previous document, not generated by CH2M HILL. Changes are minor and will not be made.

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		indicating the location of Bethesda should be inside the Route 495, nearer to the northwest DC boundary. Please specify the scale of this map.	
69	Section 1.1.4, Page 1-4	<ul style="list-style-type: none"> The first sentence refers to the Pleistocene as a Period. The Pleistocene is a "series" within the Quaternary Period (Cretaceous and Quaternary are equivalent hierarchal units of geologic time. Please revise the text accordingly. 	<ul style="list-style-type: none"> The wording has not been changed. This information was taken directly from the USDA.
70	Section 1.1.8, Page 1-6, 1 st Paragraph	<ul style="list-style-type: none"> Please define the ranking category associated with "species of regional concern." 	<ul style="list-style-type: none"> The wording has been changed to "species of concern in the region". There is no official MD DNR category called "species of regional concern". The species listed as of concern in the region are those for which habitat might be declining or there are indications that populations levels may be decreasing. They are species that need to be watched.
71	Page 1-25, Figure 1-2.	<ul style="list-style-type: none"> The scale on this figure appears to be greatly inaccurate. Please revise. 	<ul style="list-style-type: none"> Scale will be corrected.
72	Section 2.2.1, Page 2-1	<ul style="list-style-type: none"> Will it be necessary to obtain a military security clearance/badge for the field personnel? Do all field personnel and subcontractor employees need the OSHA 40-hour certificate to work at the installation? 	<ul style="list-style-type: none"> Yes. All personnel require 40-hour HAZWOPER training and are issued badges. No change will be made to the text.
73	Section 2.2.2, Page 2-1	<ul style="list-style-type: none"> According to this section, "the investigation derived waste (IDW) is to be handled in accordance with Station SOP SA-13." This SOP specifies that "the plan documents for site activities shall include a description of control procedures for contaminated materials. The planning strategy must assess the type of contamination, estimate the amounts of IDW that would be produced, describe containment equipment and procedures, and delineate storage or disposal methods." The Master Field Sampling Plan 	<ul style="list-style-type: none"> Supplemental information on IDW handling was provided to the field crew in supplemental field instructions. No changes will be made to the text.

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Comment #	Location	Comment	Response
		only specifies how the IDW will be contained, stored, tested and disposed. Please either include the remaining information required by the SOP or specify the document in which this information will be provided.	
74	Section 2.3.1, Page 2-5	<ul style="list-style-type: none"> According to the key, "equipment blank" is designated "EB". Therefore, the ID on the last line of this section (page 2-5) should read "IS21EB080198". 	<ul style="list-style-type: none"> Fixed between draft and draft final.
75	Section 3.1, Page 3-1, 2 nd Paragraph	<ul style="list-style-type: none"> Please indicate when the Caffee Road Landfill was first used. 	<ul style="list-style-type: none"> The following information was found in the Phase II RFA: "The date of start-up of this unit was not known by the NOS representatives and no information concerning the date of start-up was available in the NACIP IAS report." The following sentence was added to Section 3-1, Paragraph 2 after the first sentence: "There is no information concerning the date the landfill was first used."
76	Section 3.1, Page 3-1, 2 nd Paragraph	<ul style="list-style-type: none"> Please define "flashed metal." 	<ul style="list-style-type: none"> Added the following definition to the text: "Flashed metal refers to metal debris that was burned to remove trace amounts of explosives residue."
77	Section 3.5	<ul style="list-style-type: none"> According to Figure 3-3, some drilling will occur in a wetland on the southwest side of the site. Please specify the type of drill rig that is proposed for access into this wetland area. 	<ul style="list-style-type: none"> The following sentence was added to the Waste sampling section: "An all-terrain rig will be used to gain access to the wetland area."
78	Page 4-3, Table 4-1	<ul style="list-style-type: none"> The footnotes do not provide sufficient information to allow a calculation of all of the estimates presented in the table. For example, what is the assumed composition of the paint? The estimated quantity of kerosene and benzene specified in footnote 2 should be 10,010 lbs, not 18,010 lbs. Why is benzene listed in 	<ul style="list-style-type: none"> This table was taken directly from the IAS. No changes will be made.

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Comment #	Location	Comment	Response
		two rows of the table?	
79	Section 4.3, Page 4-3, 2nd Paragraph	<ul style="list-style-type: none"> According to Section 4.1, Site 13 is the Paint Shop (Bldg. 870)." Section 4.3 states that "Site 13 is a wooded area behind Building 870." Please revise the text to clarify the actual Site 13 bounds. 	<ul style="list-style-type: none"> Site names are defined as buildings for consistency but disposal was in the wooded area behind the building. No changes will be made.
80	Page 4-4, Table 4-2	<ul style="list-style-type: none"> From the introduction to Section 4, it appears that the Paint Shop or Building 870 is still in use. Please clarify why the industrial worker is not considered a current receptor. 	<ul style="list-style-type: none"> The paint shop is still in use, however the site is defined as the wooded area behind the paint shop which is not used by industrial workers.
81	Section 4.5	<ul style="list-style-type: none"> This section discusses the collection of background samples for Site 13. Figure 4-3 indicates the proposed location of the background groundwater sample, but does not indicate the proposed location(s) of background surface and subsurface soil samples. Please indicate if these background samples will be collected. 	<ul style="list-style-type: none"> There will be no background surface soil samples taken only subsurface soil and groundwater (if necessary).
82	Section 5.5	<ul style="list-style-type: none"> Please indicate if pathways will need to be constructed through the woods to obtain drill rig access to the drum disposal area. 	<ul style="list-style-type: none"> Some clearing will be required. No changes will be made.
83	Page 6-4, Table 6-1	<ul style="list-style-type: none"> Paint sludge is not listed in the table, but the estimated quantity discarded is mentioned in the footnote. Based on the estimate that 405 lbs of paint and 312 lbs of varnish were disposed at the landfill, the amount of zinc, lead, titanium, ethyl alcohol and acetone at the site should be less than 100 lbs each, as opposed to 100-1000 lbs. Based on the information in the footnotes, the quantities of discarded benzene, toluene, xylene, ethylene glycol, iron, chromium and tetrachloroethane should be less than 10 lbs each. 	<ul style="list-style-type: none"> This table was taken directly from the IAS. No changes will be made.
84	Page 6-6,	<ul style="list-style-type: none"> Why will there be a future construction worker 	<ul style="list-style-type: none"> Will add the industrial worker to the future scenario.

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Comment #	Location	Comment	Response
	Table 6-3	receptor, but not a future industrial worker receptor?	
85	Section 6.5, Page 6-7	<ul style="list-style-type: none"> “The objectives of the remedial investigation at Site 21 are . . . to determine whether the waste is a source of contamination in the underlying soils.” In light of this objective, please discuss why no subsurface soil samples are proposed to be taken at this site. In addition, this section notes that five test pits and five soil borings will be located within the waste area. Figure 6-3 indicates the proposed locations of only the soil borings, and does not show locations of test pits. Why will only one of the five confirmatory soil borings be located along the proposed geophysical survey transects? 	<ul style="list-style-type: none"> Initial investigation will delineate waste and look for contamination in groundwater. Drilling through waste is too risky. Figure 6-3 shows approximate locations. Actual locations to be determined by field team based on geophysical survey results.
86	Section 6.5, Page 6-11, “Waste”	<ul style="list-style-type: none"> “The limits of the waste will be estimated by surveying the area with electromagnetic induction or other geophysical method.” At what point will the specific method be determined, and in which document will this decision be presented? 	<ul style="list-style-type: none"> The method is being determined by discussions with a subcontractor.
87	Table 6-5, Surface Soil Row	<ul style="list-style-type: none"> The proposed grid pattern appears to be 100 ft, not 50 ft. 	<ul style="list-style-type: none"> Note in table changed.
88	Page 7-3, Table 7-1	<ul style="list-style-type: none"> Please specify the lbs of sodium thiosulfate per gallon of fixer and the lbs of hydroquinone per gallon of developer. 	<ul style="list-style-type: none"> Information not available. This table was taken directly from the IAS. No changes will be made.
89	Figure 7-3	<ul style="list-style-type: none"> This figure indicates the locations of background surface soil samples. Will background subsurface soil samples be obtained from the same locations? 	<ul style="list-style-type: none"> Background data is needed primarily for the eco risk assessment which is concerned with surface soil only.
90	Section 2.3.2, Page 2-5, 3 rd sentence	<ul style="list-style-type: none"> “The sample shall be....” should read “The samples shall be....”. 	<ul style="list-style-type: none"> Made correction
91	Section 3.3,	<ul style="list-style-type: none"> The line that reads “...to evaluate whether site 	<ul style="list-style-type: none"> Made correction

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Comment #	Location	Comment	Response
	Page 3-3, 1 st Paragraph (and identical sections 4.3, 5.3, 6.3, and 7.3)	concentrations pose..." should read "...to evaluate whether site contaminant concentrations pose...".	
92	Section 3.5, Page 3-11, 3 rd sentence under the bullet "Waste"	<ul style="list-style-type: none"> the line that reads "estimated to be 10 to 15 feet" would be improved with the addition of the phrase "below ground surface (bgs)". In the third sentence under the bullet "Subsurface Soils", the interval "2feet" should read "2 feet". 	<ul style="list-style-type: none"> Made corrections
93	Section 5.3.	<ul style="list-style-type: none"> The last sentence on page 5-1 is cut off. 	<ul style="list-style-type: none"> No change will be made.
94	Section 6.4.2.3., Page 6-7	<ul style="list-style-type: none"> A period is missing at the end of the first sentence. 	<ul style="list-style-type: none"> Made correction
<p>Note: Written comments were not received from USEPA or EFACHES, however, input was received at team Partnering meetings and incorporated as appropriate.</p>			