



**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

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Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

November 17, 2000

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

RE: Draft Final Proposed Plan for Site 12 – Town Gut Landfill, September 2000

Dear Mr. Jorgensen:

Enclosed are comments from the Federal Facilities Section of the Maryland Department of the Environment's Waste Management Administration on the above-referenced document.

If you have any questions, please contact me at (410) 631-3791.

Sincerely,

Curtis DeTore  
Remedial Project Manager  
Federal/NPL Superfund Division

CD:bjm

cc: Mr. Dennis Orenshaw  
Mr. Robert Sadorra  
Mr. Richard Collins  
Mr. Karl Kalbacher

**Maryland Department of the Environment  
Waste Management Administration  
Environmental Restoration and Redevelopment Program  
Federal/NPL Superfund Division**

Comments on:

Draft Final Proposed Plan for Site 12 – Town Gut Landfill, September 2000

1. **Section 8, page 13, Modifying Criteria**  
Acceptance of the preferred alternative from the U.S. Environmental Protection Agency is not one of the modifying criteria. Only State and community acceptance are considered modifying criteria.

Please note that the State's acceptance and comments are subject to change based upon public comment.

This is not factual. The final RI was sent to the public repository in July 1999 and the draft FS was sent to the public repository in February 2000. Please correct this oversight in the final document.

2. Section 2.5.1, page 2-4, first paragraph, sixth sentence  
This sentence states that the depth to groundwater at Site 12 ranges from 1-4 feet below grade. This is not factual if the entire 4.3 acres are considered. During the test pit operation conducted at Site 12, pits were dug to depths of 10-12 feet below grade in a small portion of the fill near the edge of the woods and at the intersection of Atkins Road and Atkins Road Extension and no water was encountered. Please revise this sentence to indicate that while groundwater is expected at 1-4 feet over most of the site, it is greater than 10-12 feet in a small portion.
3. Section 2.5.1, page 2-4, first paragraph, ninth sentence  
Please remove this sentence from the final version of the document. It contradicts the tenth sentence by stating that the lower aquifer is only relatively confined, while the tenth sentence states that there is no hydrogeological connection or communication between the shallow and deep aquifers.
4. Section 2.9.1.2, page 2-26, second bulleted point  
This bullet states that samples will be collected on a regular basis. Please expand upon this bullet by including the time interval to be used for sample collection as discussed in our last Installation Restoration meeting.
5. Section 2.9.1.3, page 2-27, fourth bulleted point  
See comment number 4.
6. Section 2.9.1.4, page 2-28, seventh bulleted point  
See comment number 4.
7. Section 2.9.1.5, page 2-29, fourth bulleted point  
See comment number 4.
8. Section 2.9.2, page 2-30, seventh paragraph, first sentence  
This sentence states that samples will be collected on a regular basis. Please include the time interval to be used for sample collection in this sentence.