



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

November 21, 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 Record of Decision 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,

A handwritten signature in black ink, appearing to read "C. DeTore", written over a horizontal line.

Curtis DeTore
Remedial Project Manager
Federal/NPL Superfund Division

CD:bjm

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

9. **Section 2.10.8, page 2-36, heading and first sentence**
The National Oil and Hazardous Substances Pollution Contingency Plan dictates that State acceptance, not U.S. Environmental Protection Agency (EPA) acceptance, is one of the nine criteria to be considered. Please remove the reference to the EPA from the heading and text of this section.

Please note that the State's acceptance and comments are subject to change based upon public comment on the Proposed Plan for this site.

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

Comments on:

Draft Record of Decision for Site 12 – Town Gut Landfill, September 2000

Specific Comments

1. Section 2.3, page 2-2, first paragraph, first sentence
This sentence states that the Remedial Investigation (RI), Feasibility Study (FS) and Proposed Plan documents for Site 12 were made available to the public on the same date. 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.

9. **Section 2.10.8, page 2-36, heading and first sentence**
The National Oil and Hazardous Substances Pollution Contingency Plan dictates that State acceptance, not U.S. Environmental Protection Agency (EPA) acceptance, is one of the nine criteria to be considered. Please remove the reference to the EPA from the heading and text of this section.

Please note that the State's acceptance and comments are subject to change based upon public comment on the Proposed Plan for this site.