



Proposed Plan

Site 25, Hypo Discharges from X-ray Building No. 2, Building 588

U.S. Navy Announces the Site 25 Proposed Plan

**Naval District Washington, Indian Head
Indian Head, Maryland**

May 2004

Introduction

This **Proposed Plan** recommends that no further action be taken to address the Hypo Discharges from X-ray Building No. 2, Building 588 (Site 25) at Naval District Washington, Indian Head (NDWIH) in Indian Head, Maryland. The Plan provides the rationale for this recommendation, based on the investigative activities performed at Site 25 to date, and explains how the public can participate in the decision-making process. The location of the NDWIH and Site 25 are shown on Figure 1.

The Department of the Navy (Navy) (the lead agency for the site activities) and the U. S. Environmental Protection Agency Region III (EPA) (support agency), in consultation with the Maryland Department of the Environment (MDE) (support agency) issue this document as part of the public participation responsibilities under Title 40 of the Code of Federal Regulations (CFR), Section 300.430(f)(2). Title 40 CFR 300 is known as the **National Oil and Hazardous Substances Pollution Contingency Plan (NCP)**. This Proposed Plan summarizes information that can be found in greater detail in the **Remedial Investigation (RI)** report and other documents contained in the **Administrative Record File** for this site.

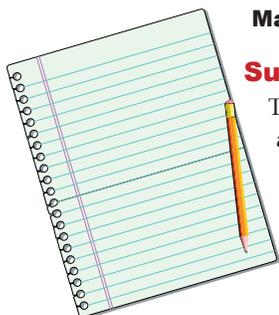
The Navy and EPA, in consultation with MDE, will make a final decision on the **response action** for the Site after reviewing and considering all information submitted during the 30-day **public comment period** and may modify the preferred response action or select another action based on any new information or public comments. Therefore, community involvement is critical and the public is encouraged to review and comment on this Proposed Plan. After the public comment period has ended and the comments and information submitted during that time have been reviewed and considered, the Navy and EPA, in consultation with MDE, will document the action selected for the site in a **Record of Decision (ROD)**.

Mark Your Calendar for the Public Comment Period

Public Comment Period May 28 - June 28, 2004

Submit Written Comments

The Navy, EPA, and MDE will accept written comments on the Proposed Plan during the public comment period. To submit comments or obtain further information, please refer to the insert page.



Attend the Public Meeting June 17, 2004, from 5:00 pm to 7:00 pm

Senior Center
100 Cornwallis Square
Indian Head, MD

The public comment period will include a public meeting during which the Navy, EPA, and MDE will provide an overview of the site, previous investigation findings, remedial alternatives evaluated, and the Preferred Alternative, answer questions, accept public comments.



Location of Administrative Record

The Administrative Record is available for public viewing at the following location:

Naval District Washington, Indian Head
General Library
Building 620 (The Crossroads)
101 Strauss Avenue, Indian Head, MD

Phone: 301.744.4747

Hours:
M-F 9:00 am - 5:30 pm
Sat/Sun closed

A glossary of specialized terms used in this Proposed Plan is attached. Words included in the glossary are indicated in **bold print** the first time they appear in the plan.

Site History

Site 25 is a drainage ditch located mostly in a forested ravine (Figure 2). The drainage ditch flows from Building 588, Rocket Motor Loading Building, into the industrial wastewater outfall IW46. Building 588 was constructed in 1944 and contained facilities used for X-ray film developing. From 1944 to circa 1964, the X-ray activities conducted at Building 588 generated wastes, which consisted of sodium thiosulfate fixer, hydroquinone developer, and silver in a silver thiosulfate complex. According to the **Initial Assessment Study (IAS)** (Fred C. Hart Associates, Inc., 1983), between 1944 and 1964, approximately 112,800 lbs. of sodium thiosulfate, 112,800 lbs. of hydroquinone, and 864 lbs. of silver were generated. The IAS further noted that silver compounds may have been deposited along the drainage path of IW46 or in the Mattawoman Creek. A site reconnaissance conducted as part of the IAS indicated no vegetation stress or contamination immediately behind the building at the point of the outfall discharge. There was evidence of disposal of paint materials and accessories, including paint brushes, empty solvent cans, and trash.

The X-ray section of Building 588 is no longer in use. A concrete pad located at the southwest corner of the building is currently used as a satellite accumulation area for the storage of nonexplosive hazardous waste (e.g., 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). Prior to 1996, the concrete pad held a dumpster that was used for the storage of solid explosive hazardous waste. Drainage in the pad area is directed south to the ditch.

Site Characteristics

The Site 25 drainage ditch channel at the bottom of the ravine is approximately 1 foot wide. Flow in the ditch is inter-mittent, occurring only during storm-water runoff events and in the past when there was wastewater discharge from Building 588. Water draining from Building 588 flows southwest down a steep slope into the ditch, which then flows south for approximately 500 feet until it reaches a road where it takes a sharp turn to the west and follows the road for about 100 feet before flowing under the road, into



Figure 1 - NDWIH, Indian Head, MD



Figure 2 - Site 25 Map

Outfall IW46. The discharge point of Outfall IW46 into Mattawoman Creek is approximately 100 feet south of this road. The nearest potable water well is Well A, located 400 feet southeast of the site. Figure 2 depicts Site 25 surface features and topography.

Soil underlying Site 25 consists of dense clay and silty clay with traces of sand and pebbles down to depths of 10 to 24 feet below ground surface. The **ground-water** table at Site 25, ranges in elevation from about 10 to 12.5 feet above mean sea level. The general flow direction of groundwater is to the south, following steep site slopes, towards Mattawoman Creek.

Investigation History

Several investigations were conducted at Site 25 between 1983 and 2002. Below is a chronological description of each of these investigations.

Initial Assessment Study (IAS)

The IAS (Fred C. Hart Associates, Inc., 1983) referred to Site 25 as the Hypo Discharges from X-ray Building No. 2, Building 588. The IAS recommended a Confirmation Study for Site 25 only if silver at Site 5 was found to be a danger to aquatic life. Site 5 is the site of the Grain Manufacture and X-ray Building (Building 731). Site 25 is similar to Site 5 in that both sites discharged photographic developing wastes to open ditches.

Results of the Confirmation Study conducted at Site 5 (CH2M HILL, 1985) showed elevated levels of silver in soil samples collected from a drainage ditch at Site 5. Based on the Site 5 results, the IAS recommended a Confirmation Study at Site 25.

Phase II RCRA Facility Assessment (RFA)

A Phase II RFA (Kearny, A.T., Inc., 1988) was conducted by EPA and consisted of a Preliminary Review (PR) of available documents and a Visual Site Inspection (VSI).

During the VSI of Site 25, a temporary waste accumulation area constructed of concrete for storage of drummed wastes was noted adjacent to Building 588. The report indicated that there is no history of releases at the temporary waste accumulation pad. It also reported that discharge of spent photographic solution, which occurred from approximately 1944 to 1964, was to an unlined ditch outside of Building 588. No visible signs of release were noted during the VSI.

Remedial Investigation (RI)

Surface and subsurface soils sampling, monitoring well installation, and groundwater sampling were conducted in July 2000 and February 2002 as part

of the RI conducted at Site 25 and four other sites (CH2M HILL, 2004). The objective of the RI for Site 25 was to determine whether the untreated wastewater discharged from Building 588 into the IW46 drainage area contaminated the underlying soil and groundwater.

Surface and subsurface soil samples, including background samples (i.e., samples collected in areas considered to be uncontaminated), were collected and analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), metals, and nitroglycerin. Groundwater samples were collected from the shallow monitoring wells and analyzed for VOCs, SVOCs, metals, and nitroglycerin.

Several metals and SVOCs, and few VOCs were detected in low concentrations in surface and subsurface soil. Groundwater contained no significant levels of organic compounds and contained few metals. The metals detected in the groundwater were different from those detected in the soil. Silver was detected south and east of Building 588 and was detected in only one soil sample in the drainage swale. Silver was not detected in groundwater downgradient of the site.

Following the soil sampling in 2000, construction activities adjacent to Site 25 resulted in the removal of soil in the vicinity of sample IS25SS21/SB21, an area where many of the highest concentrations of metals were detected. The excavated soil was disposed off-site in accordance with federal and state regulations.

The remedial investigation recommended no further action for this site because risks to human health and the environment were within acceptable values.

Principal Threats

There are no principal threats in any of the media at Site 25. Principal threats are explained in the box on the next page.

Scope And Role Of The Action

This Proposed Plan addresses the evaluation of the preferred alternative for Site 25 only. It does not include or directly impact any other sites at the facility.

The purpose of the Proposed Plan is to summarize activities performed to date to investigate Site 25 and provide a rationale for the proposed response action, which in this case is no further action. As described in the following sections, no human health or ecological risks that require further action at this site were identified.

Summary Of Site Risks

This section presents an overview of the risks associated with the current and future land uses of Site 25. A detailed discussion of risks at Site 25 and the risk evaluation process can be found in the *Final Remedial Investigation Report, Sites 11, 13, 17, 21, and 25, Naval District Washington Indian Head, Indian Head, Maryland* (CH2M HILL, 2004).

To summarize, the potential risk to people, plants, and animals from existing chemicals in Site 25 soil is low. Results of the risk assessments conclude that exposure to site soil would not result in unacceptable human health or ecological risks at Site 25. In addition, there appears to be no risk of contaminating the underlying groundwater.

Human Health Risks

Soil

A baseline human health risk assessment was performed for soil at Site 25 to determine the current and future effects of contaminants in soil on human health. The receptors evaluated in the risk assessment for both current and future uses included:

- For current uses - adolescent and adult trespassers/visitors, and industrial workers.
- For future uses - adult and child residents, adult and adolescent trespassers/visitors, industrial workers, and construction workers.

The Navy evaluated the residential exposure scenario, to confirm that no land use restrictions would be necessary at the site. The site is currently a forested area within an industrial facility and there are no other current or projected future land uses of the site.

Chemicals of potential concern (COPCs) were identified during calculation of risk estimates for human receptors. The COPCs in soil were aluminum, arsenic, cadmium, chromium, iron, manganese, silver, thallium, vanadium, benzo(a)anthracene, benzo(a)pyrene, benzo(a)fluoranthene, and dibenz(a,h)anthracene. However, the baseline risk assessment subsequently determined that under current site use conditions, soil does not represent an unacceptable risk. The **hazard index (HI)** was below one for all receptors and the calculated cancer risk is at the lowest end of the EPA's acceptable target risk range of 10^{-4} to 10^{-6} . For an explanation of the human health risk assessment process, see the text box on page 5.

The highest HI calculated for the soil under current conditions is 0.48 for the industrial worker scenario

What is a "Principal Threat"?

The National Contingency Plan establishes an expectation that EPA will use treatment to address "principal threats" posed by a site wherever practicable [40 CFR Section 300.430 (a)(1)(iii)(A)]. The "principal threat" concept is applied to the characterization of "source materials" at a **Superfund** site. A source material is material that includes or contains hazardous substances, pollutants, or contaminants that act as a reservoir for migration of contamination to groundwater, surface water, or air or acts as a source for direct exposure. Contaminated groundwater generally is not considered to be a source material; however, non-aqueous-phase liquids (NAPLs) in groundwater may be viewed as a source material. Principal threat wastes are those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained or would present a significant risk to human health or the environment should exposure occur. The decision to treat these wastes is made on a site-specific basis through a detailed analysis of the alternatives using the nine remedy selection criteria. If through this analysis, a treatment remedy is selected, then this selection is reflected in the Record of Decision, which will include a finding that the remedy uses treatment as a principal element.

and the carcinogenic risk is 2×10^{-6} for the adult trespasser/visitor scenario. Both values indicate acceptable risk. The highest HI calculated for soil under potential future conditions is 2.5 for the child resident scenario, and is due to iron, which is above the EPA benchmark of 1. Iron, however, is considered an essential human nutrient and the concentration detected in the soil would result in a daily intake of 5.4 mg/day, which is below the recommended daily intake of 10 mg/day. Therefore, it is the Navy's and the EPA's current judgement that there is no unacceptable risk from iron. The calculated HI for the future adult resident is less than the EPA benchmark. The calculated cancer risk of 4.6×10^{-5} to a future lifetime resident of the site is within the EPA's target risk range, which is protective of human health. It should be noted that the future use of this site as a residential area is very unlikely.

In summary, the risk assessment for the future residential scenario indicates that no unacceptable health threats (both cancer and non-cancer) are posed to people for exposure to soil at the site. Therefore, it is the Navy's and the EPA's current judgement that no further action is necessary to protect human health from chemicals in the soil at Site 25.

Groundwater

A human health risk assessment was performed for groundwater at Site 25 to determine the future effects of groundwater contaminants on human health. The receptors evaluated in this risk assessment included future adult and child residents, lifetime resident, and

What is Human Health Risk and How is it Calculated?

A human health risk assessment estimates “baseline risk.” This is an estimate of the likelihood of health problems occurring if no cleanup action were taken at a site. The Navy undertakes a four-step process to estimate baseline risk at a site:

Step 1: Analyze Contamination

Step 2: Estimate Exposure

Step 3: Assess Potential Health Dangers

Step 4: Characterize Site Risk

In Step 1, the Navy looks at the concentrations of contaminants found at a site as well as past scientific studies on the effects these contaminants have had on people (or animals, when human studies are unavailable). Comparisons between site-specific concentrations and concentrations reported in past studies help the Navy to determine which contaminants are most likely to pose the greatest threat to human health.

In Step 2, the Navy considers the different ways that people might be exposed to the contaminants identified in Step 1, the concentrations that people might be exposed to, and the potential frequency and duration of exposure. Using this information, EPA calculates a “reasonable maximum exposure” (RME) scenario that portrays the highest level of human exposure that reasonably could be expected to occur.

In Step 3, the Navy uses the information from Step 2, combined with information on the toxicity of each chemical, to assess potential health risks. The Navy considers two types of risk: cancer risk and non-cancer risk. The likelihood of any kind of cancer resulting from a site is generally expressed as an upper-bound probability, for example, a “1 in 10,000 chance.” In other words, for every 10,000 people that could be exposed, one extra cancer may occur as a result of exposure to site contaminants. An extra cancer case means that one more person could get cancer than would normally be expected to from all other causes. For non-cancer health effects, the Navy calculates a “hazard index (HI).” The key concept here is that a “threshold level” (measured usually as a hazard index of less than 1) exists below which adverse, non-cancer health effects are no longer predicted.

In Step 4, the Navy determines whether site risks are great enough to cause health problems for people at or near the site. The results of the three previous steps are combined, evaluated, and summarized. The Navy adds together the potential risks from the individual contaminants to determine the total risk resulting from the site.

construction worker. The COPCs for groundwater are barium, iron, and manganese.

The HIs for reasonable maximum exposure (RME) for groundwater under potential future conditions are 7.1 for child resident and 3.1 for adult resident, which are above the EPA benchmark of 1.0. The majority of the hazard is due to the ingestion of manganese. If manganese is excluded from the risk assessment, then the HI for both child and adult residents will be below the EPA benchmark. The calculated cancer risk to a future lifetime resident is estimated to be zero because none

of the groundwater COPCs are carcinogenic.

Although the risk assessment indicates that manganese in the groundwater may pose unacceptable non-cancer hazards to future residents, the site conditions and the data indicate that manganese at Site 25 is naturally-occurring (CH2M HILL, 2004). Manganese is not associated with the processes used at Site 25. In addition, the manganese concentrations in the surface and shallow subsurface soils were consistent with background levels. Therefore, it is the Navy’s and the EPA’s current judgement that no further action is necessary to protect human health from chemicals in the groundwater at Site 25.

Ecological Risks

Soil

The Navy has also conducted an ecological risk assessment for the site, which included an evaluation of potential risks to plants and animals from chemicals at the site. For an explanation of the ecological risk assessment process, see the text box on page 6. The results of the ecological risk assessment indicate that chemicals in the soil at the site pose minimal risk to plants and animals.

Specifically, the results of the risk assessment suggest that the concentrations of chemicals in the soil that might **bioaccumulate** through the foodchain are not high enough to pose a significant risk to birds and mammals at the site. Several metals in the soil were identified as posing potential risks to plants and soil invertebrates (e.g., earthworms). However, the concentrations of three of the metals (aluminum, iron, and vanadium) were consistent with background concentrations, thus indicating that the risk from the metals is naturally occurring or is overestimated in the risk assessment. Four other metals (chromium, mercury, silver, and zinc) were present at concentrations that exceed screening values (i.e., indicating potential risks to plants or soil invertebrates) and also background concentrations. However, additional toxicity evaluations for these metals performed during the remedial investigation suggest that any adverse impacts to plants and animals are unlikely.

Though the results of the screening ecological risk assessment indicated that chemicals in the soil at Site 25 pose minimal risk to ecological receptors, additional sampling in Mattawoman Creek was recommended to investigate potential silver contamination in the sediments adjacent to the site following the identification of a potential transport pathway after the remedial investigation. To assess if additional investigation is needed, the Navy with the EPA’s Bio-

logical Technical Assistance Group reviewed silver data collected in the vicinity of Site 25 for the Mattawoman Creek Study (TTNUS, 2002). The Navy and EPA came to the conclusion that further investigation of site-specific ecological risk in the sediment of Mattawoman Creek was not warranted for Site 25 (CH2M HILL, 2003).

Preferred Alternative

The Navy and the EPA, with the support of the MDE, are proposing no further action as the preferred alternative for Site 25. Based on the results of investigations conducted at Site 25, the Navy, the EPA, and the MDE have determined that the site does not pose

What is Ecological Risk and How is it Calculated?

An ecological risk assessment evaluates the potential adverse effects that human activities have on the plants and animals that make up ecosystems. The ecological risk assessment process follows a phased approach similar to that of the human health risk assessment. The risk assessment results are used to help determine what measures, if any, are necessary to protect plants and animals.

Ecological risk assessment includes three steps:

Step 1: Problem Formulation

The problem formulation includes:

- Compiling and reviewing existing information on the site habitat, plants, and animals that are present
- Evaluating how the plants and animals may be exposed
- Identifying and evaluating area(s) where site-related chemicals may be found
- Evaluating potential movement of chemicals in the environment
- Evaluating routes of exposure (for example, ingestion)
- Identifying receptors (plants and animals that could be exposed)
- Identifying exposure media (soil, air, water)
- Developing how the risk will be measured for all complete pathways (determining the risk where plants and/or animals can be exposed to chemicals)

Step 2: Risk Analysis

The second step of the ecological risk assessment is risk analysis, in which potential exposures to plants and animals are estimated and the concentrations of chemicals at which an effect may occur are evaluated.

Step 3: Risk Characterization

The third step in the ecological risk assessment is risk characterization, in which all of the information identified in the first two steps are used to estimate the risk to plants and animals. Also included is an evaluation of the uncertainties (potential degree of error) that are associated with the predicted risk evaluation and their effects on the conclusions that have been made.

an unacceptable risk to people, plants, and animals; therefore, no alternative other than the no further action alternative was evaluated. Under this alternative, no response action will be performed at the site; therefore, no institutional controls, remedy schedule, capital cost estimation, or annual operation and maintenance are necessary. The Navy may modify the preferred alternative or select another alternative if public comments or additional data indicate that another alternative will yield a more appropriate result.

Community Participation

The Navy and the EPA provide information regarding the cleanup of the NDWIH to the public through public meetings, the **information repository**, and announcements published in the newspaper. The Navy and EPA encourage the public to gain a more comprehensive understanding of the site and the **CERCLA** activities that have been conducted at the site.

The 30-day public comment period is May 28, 2004 through June 28, 2004. The public meeting will be held on June 17, 2004, from 5:00 P.M. to 7:00 P.M. at the Senior Center, 100 Cornwallis Square, Indian Head, Maryland [301-744-4627]. The location of the Information Repository is provided on Page 1 of this Proposed Plan.

Minutes of the public meeting will be included in the Administrative Record file. All comments received during the public meeting and comment period will be summarized and responses will be provided in the **Responsiveness Summary** section of the ROD. The ROD is the document that will present the selected remedy and will be included in the Administrative Record file.

Written comments can be submitted via mail, e-mail, or fax and should be sent to the following addressee:

Ms. Tara Landis, Public Affairs Officer
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References

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- CH2M HILL, 2003. Technical Memorandum. *Final, Revised Approach for Ecological Risk Issues at Site 25, Indian Head Division-NSWC*, Indian Head, Maryland.
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Glossary of Terms

Administrative Record File: A record made available to the public that includes all information considered and relied on in selecting a remedy for a site.

Bioaccumulate: The process by which chemicals are taken up by organisms directly from environmental media (i.e., direct contact with soil, sediment, water) as well as exposure through other routes, such as consumption of food and environmental media containing chemicals.

CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act (1980), also known as the Superfund Law, as amended by the Superfund Amendments and Reauthorization Act of 1986. CERCLA provides the authority and procedures for responding to releases of hazardous substances, pollutants, and contaminants from inactive hazardous waste disposal sites.

Comment Period: A time for the public to review and comment on various documents and actions taken, either by the Navy, EPA, or MDE. A minimum 30-day comment period is held to allow community members to review the Administrative Record file and review and comment on the Proposed Plan.

Groundwater: Water beneath the ground surface that fills pore spaces between materials such as sand, soil, or gravel to the point of saturation. In aquifers, groundwater occurs in quantities sufficient for drink-

ing water, irrigation, and other uses. Groundwater may transport substances that have percolated downward from the ground surface as it flows towards its point of discharge.

Hazard Index (HI): The ratio of the daily intake of chemicals from onsite exposure divided by the reference dose for those chemicals. The reference dose represents the daily intake of a chemical not expected to cause adverse health effects.

Information Repository: A file containing information, technical reports, and reference documents regarding an NPL site. This file is usually maintained in a place with easy public access, such as a public library. However, for security reasons following September 11, the library could no longer be used.

Initial Assessment Study (IAS): The first of two phases of environmental investigation under the Navy Assessment and Control of Installation Pollutants program. The IAS is a preliminary evaluation of the facility that (1) identifies areas potentially contaminated by previous handling, storage, and disposal of hazardous substances; (2) assesses the potential effects of the contamination on human health and animals; and (3) recommends remedial measures appropriate for the contaminated areas. The second phase of the Navy Assessment and Control of Installation Pollutants program, the Confirmation Study, is completed if further action is required.

National Oil and Hazardous Substances Pollution Contingency Plan (NCP): The purpose of the NCP is to provide the organizational structure and procedures for preparing and responding to discharges of oil and releases of hazardous substances, pollutants, or contaminants.

Proposed Plan: A public participation requirement of Superfund Amendments and Reauthorization Act of 1986 (SARA) in which the lead agency summarizes the preferred cleanup strategy and rationale for the public. This agency also reviews the alternatives presented in the detailed analysis of the feasibility study. The Proposed Plan may be prepared either as a fact sheet or as a separate document. In either case it must actively solicit public review and comment on all alternatives under consideration.

Record of Decision (ROD): An official public document that explains which cleanup alternative(s) will be used at a NPL sites. The ROD is based on information and technical analysis generated during the RI/FS and consideration of public comments and community concerns. The ROD explains the remedy selection process and is issued by the Navy following the public comment period.

Remedial Investigation (RI): An in-depth study designed to gather data needed to determine the nature and extent of contamination at a Superfund site, establish site cleanup criteria, identify preliminary alternatives for response action, and support technical and cost analyses of alternatives.

Response Action: As defined by Section 101(25) of CERCLA. Response Action means remove, removal, remedy, or response action, including related enforcement activities.

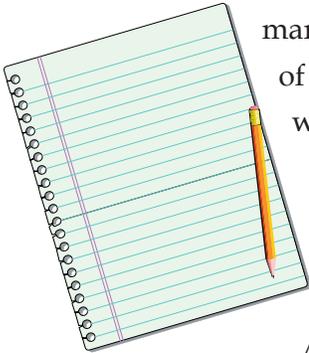
Responsiveness Summary: A summary of oral and written public comments received by the lead agency during a comment period and the responses to these comments prepared by the lead agency. The responsiveness summary is an important part of the ROD, highlighting community concerns for decision makers.

Superfund: The program operated under the legislative authority of CERCLA and SARA that funds and carries out EPA solid waste emergency and long-term removal and remedial activities. These activities include establishing the National Priorities List, investigating sites for inclusion on the list, determining their priority, and conducting and/or supervising the cleanup and other remedial actions.

Mark Your Calendar for the Public Comment Period

**Public Comment Period
May 28 - June 28, 2004**

Submit Written Comments



Written comments must be post-marked no later than the last day of the public comment period, which is June 28, 2004. Based on the public comments or on any new information obtained, the Navy may modify the Preferred

Alternative. The insert page

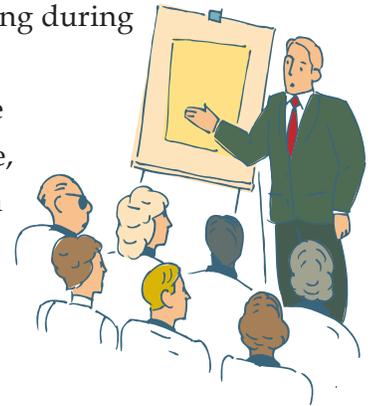
of this Proposed Plan may be used to

provide comments, although use of the form is not required. If the form is used to submit comments, please fold page, seal, add postage where indicated, and mail to addressee as provided.

**Attend the Public Meeting
June 17, 2004 from 5 p.m. to 7 p.m.**

Senior Center
100 Cornwallis Square
Indian Head, MD 20640

The public comment period will include a public meeting during which the Navy, EPA, and MDE will provide an overview of the site, previous investigation findings, remedial alternatives evaluated and the Preferred Alternative; answer questions; and accept public comments on the Proposed Plan.



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