



DEPARTMENT OF THE NAVY
NAVAL SUPPORT ACTIVITY
SOUTH POTOMAC
4271 POTOMAC DRIVE
DAHLGREN, VIRGINIA 22448-5106

IN REPLY REFER TO

5090
Ser HN2WSJ/94
July 27, 2007

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

Dear Mr. Biles:

We are writing in response to your letter of February 23, 2007 regarding the Naval Support Facility, Indian Head (NSF-IH) Final Proposed Plan for Site 57 - Trichloroethylene Contamination at Building 292. The follow recommendations are from your letter, which is also attached:

"Recommendations:

Although it may seem desirable to achieve a groundwater level of acceptance that would permit the use of groundwater for potable use it is felt that such a choice might give a level of false confidence in the use of groundwater at the facility for human consumption than is unwarranted. Site 57 is not the only site that impacts groundwater at the facility.

1. The facility has been identified as a "super fund" site and in order to provide for the necessary future human health, safety and welfare it is recommended we impose permanent restrictions on the use at the facility of shallow groundwater as a source of potable water.

2. I have been told that no contamination is currently being detected from Site 57 as entering the Mattawoman. I feel, however, in order to provide the necessary assurance that such migration does not happen, Alternative 2 is recommended as the preferred alternative. Alternative 2 would be far less costly in terms of dollars and the use of human resources and yet would provide the necessary monitoring to confirm the effectiveness of the remedial action, to determine whether contaminates are migrating at unacceptable concentrations, and to evaluate whether future action is required. Such monitoring would provide the necessary safeguards to avoid any future contamination of the Mattawoman."

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In response to your first comment, the Navy does not currently use shallow groundwater at NSF-IH as a potable water source and does not intend to do so in the future. You are correct that NSF-IH is a Superfund site and there are other sites at our Facility that impact the shallow groundwater. However, there are currently only twelve sites that have impacted the shallow groundwater or have the potential to impact the shallow groundwater at both NSF-IH and the Annex at Stump Neck. Most of these sites range in size from less than an acre up to five acres and the impacted or potentially impacted shallow groundwater from these sites represents a small portion of the total shallow groundwater at the facility. Therefore, it is neither desirable nor required to restrict the use of all shallow groundwater at the facility. In the unlikely event that shallow groundwater would be considered as a source of potable water at the facility, compliance with other applicable laws such as the Safe Drinking Water Act would apply and guarantee the adequate protection of human health and the environment.

In response to your second comment, you are correct in that no contamination is currently migrating from Site 57 into the Mattawoman Creek. The preferred remedy, Alternative 3, includes in-situ remediation and long term monitoring, and is thus better suited to prevent any such future migration than Alternative 2, which only includes natural attenuation and monitoring. In addition, the EPA has a preference at Superfund sites to seek a remedy involving some form of active or passive treatment which will provide long-term effectiveness and permanence. According to EPA document EPA/540/G-88/003 *Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites* of December 1988, page 1-1, which can be found at the following web address:

<http://www.epa.gov/superfund/resources/remedy/pdf/540g-88003-s.pdf>:

'...Statutory mandates require that remedies be protective and utilize permanent solutions and treatment technologies to the maximum extent practicable. Consistent with these mandates, the goal of Superfund ground-water actions is to restore ground water to its beneficial uses within a reasonable time frame, given the particular site circumstances.'

Although institutional controls, such as long-term monitoring, can be used in conjunction with other technologies, they are not considered permanent remedies.

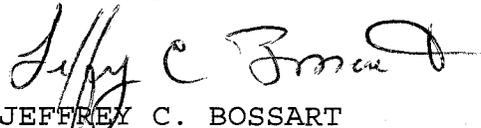
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We thank you for taking the time to review this document and provide us with your comments. If you have any additional questions or comments concerning our responses, please contact Mr. Shawn Jorgensen by telephone on (301) 744-2263 or through email at shawn.a.jorgensen@navy.mil.

Please direct all written correspondence to:

Naval Support Facility, Indian Head
Environmental Program Office
Attn: Jeffrey Bossart, Code HN2W
3972 Ward Road, Suite 101
Indian Head, MD 20640-5157

Sincerely,



JEFFREY C. BOSSART
Director, Environmental Program
By direction of the Commander

Enclosures: 1. E. Biles' Letter of 23 Feb 07 on Final Proposed Plan for Site 57 dated Jan 07

Distribution:
RAB Members

Copy to:
CH2M HILL (M. Kasim)
Tetra Tech NUS (G. Latulippe)



6315 Indian Head Highway
Indian Head, Maryland 20640

February 23, 2007

FAX 301 744 4180
Naval Support Facility, Indian Head
Attn: Shawn Jorgensen, Code HN2WSJ
3972 Ward Road, Suite 101
Indian Head, MD 20640-5157

REF: Site 57 Proposed Plan

Dear Mr. Jorgensen:

Following are my comments and recommendations regarding the above Referenced Plan for Site 57.

Comments:

Background--As I recall Site 57 has been one of the focal points of our clean-up efforts at Indian Head since the early 1990's. Considerable progress has been made in the control and discharge of hazardous waste from this site. As a result of the contaminated soil being removed from the site in 2006 we are now informed that "There are no unacceptable risks to human health or the environment from exposure to surface water or sediment at the site." The current review has centered on addressing groundwater contamination resulting primarily from spent TCE. Infiltration or migration of TCE-contaminated groundwater into the storm sewer has also been affectively addressed.

Human Health Risks—The report cites that the human health risk assessment "assumed industrial and hypothetical residential land use and hypothetical use of shallow groundwater as a source of drinking water. The study concludes "the only unacceptable estimated incremental cancer risks at site 57 were for hypothetical future child residents and hypothetical future adult residents." "These potential risks were estimated based on exposure to the maximum concentrations of TCE and VC in shallow groundwater and use of shallow groundwater as a source of drinking water." The report further adds "future residential use in unlikely for Site 57."

In the unlikely use of site 57 for residential purposes we must point out that even if it were to be used for residential purposes it is extremely unlikely that shallow groundwater would be considered as a source for potable drinking water. The Town of Indian Head and the Navy facility at Indian Head are both serviced by central water systems that are monitored by licensed well operators. The water is pumped from confined aquifers and is chemically treated. Very few shallow wells are now being licensed for residential use for potable water. Shallow wells are easily susceptible to surface run-off contamination and

are generally avoided today as a source of potable water. As an additional safeguard the report states "restrictions on the use of shallow groundwater as a source of potable water would be imposed for these alternatives until the PRG's are attained."

Proposed Remedial Alternative—The report has identified alternative 3, In-Situ Bioremediation as the preferred alternative for cleaning up shallow groundwater at Site 57. The report further states that the alternative was selected over the other alternatives because it is expected to achieve substantial and long-term risk reduction through a combination of treatment, LUC's and monitoring.

Recommendations:

Although it may seem desirable to achieve a groundwater level of acceptance that would permit the use of groundwater for potable use it is felt that such a choice might give a level of false confidence in the use of groundwater at the facility for human consumption than is unwarranted. Site 57 is not the only site that impacts groundwater at the facility.

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Please feel free to call me if you have any questions. Thanks for the opportunity of commenting.

Sincerely,



Elmer S. Biles
Community Member RAB

301 283 6298