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NSWC INDIAN HEAD
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COMMENTS ON DRAFT FEASIBILITY STUDY REPORT SITE 57 NSWC INDIAN HEAD MD
6/28/2002
NAVFAC WASHINGTON

**Navy RPM (Jeff Morris) Comments on
Draft Feasibility Study Report
Site 57 – Former Drum Loading Area
Indian Head Division
Naval Surface Warfare Center
June 28, 2002**

<u>Page</u>	<u>Comment</u>
Table ES-1 1 of 2	Under Alternative 1, Short-term effectiveness is evaluated as “No short-term impacts or concerns”. Since nothing is being done, it would be better to use the wording applied in Table 2, “not applicable”.
	Under Alternative 2, it is stated that the cover would comply with landfill closure requirements. Are those ARARs?
2of 2	Since Alternative 2 requires LUCs, hence five-year reviews, shouldn't the O&M costs reflect this?
Table ES-2 2 of 4	The cost for Alternative 3 seems high in comparison to the PRB and, especially, the P & T, which will run for 19 years.
2-12	In the last paragraph of section 2.4.1, the decision not to identify soil PRGs for methylene chloride, benzo(a)anthracene, benzo(b)fluoranthene, and arsenic is based on their absence in groundwater samples. Since these PRGs are to protect groundwater from contaminants in the soil, and the concentrations were higher than the EPA SSLs based on a DAF of 10, what assurance is there that they won't migrate?
5-3	In section 5.2.1.1, include the following under Alternative 1: “Resources should not be expended on sites, which pose little or no threat to humans or the environment.” These words come directly from the IR Manual and represents the true reason for the no action alternative. I think the concept of a “baseline for comparison” might be more appropriately tied to a full cleanup alternative.