

**SITE-SPECIFIC
PUBLIC PROTECTION PLAN**

FOR THE

Remedial Design/Remedial Action
at
4825 Glenbrook Road
Spring Valley FUDS, Washington, D.C.

CONTRACT NO.: W912DY-09-D-0062
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Prepared For:



U.S. ARMY CORPS OF ENGINEERS
BALTIMORE DISTRICT
BALTIMORE, MD 21201-1715

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TABLE OF CONTENTS

Section	Page
1. INTRODUCTION.....	1
2. DEFINITION OF TERMS.....	5
2.1 MAXIMUM CREDIBLE EVENT (MCE).....	5
2.2 TEMPORARY EMERGENCY EXPOSURE LIMIT LEVEL 1 (TEEL-1) TEEL-1DISTANCE.....	5
2.3 ENGINEERING CONTROL STRUCTURE (ECS)	5
2.4 EXCLUSION ZONE	6
2.5 SHELTER-IN-PLACE	6
3. KEY AGENCY RESPONSIBILITIES.....	7
3.1 U.S. ARMY CORPS OF ENGINEERS, BALTIMORE DISTRICT (USACE BALTIMORE)	7
3.2 U.S. ARMY ENGINEERING AND SUPPORT CENTER AT HUNTSVILLE (USAESCH).....	7
3.3 PARSONS.....	8
3.4 U.S. ARMY PROGRAM MANAGER FOR CHEMICAL DEMILITARIZATION, OFFICE OF THE PRODUCT MANAGER FOR NON-STOCKPILE CHEMICAL MATERIEL (PM NSCM)	8
3.5 CHEMICAL BIOLOGICAL RADIOLOGICAL NUCLEAR EXPLOSIVES (CBRNE) ANALYTICAL REMEDIATION ACTIVITY (CARA).....	9
3.6 EDGEWOOD CHEMICAL BIOLOGICAL CENTER (ECBC)	9
3.7 D.C. GOVERNMENT	9
4. PROTECTIVE ACTIONS AND PROCEDURES.....	11
4.1 SITE CONTROL AND SITE WORK ZONES	11
4.1.1 The Hazard Distance and Exclusion Zone.....	11
4.1.2 The Support Zone	11
4.2 NOTIFICATION AND EDUCATION	11
4.3 AIR MONITORING.....	12
4.4 TRAINING	13
4.4.1 Personnel Training.....	13
4.4.2 Emergency Preparedness Drills	13
4.4.2.1 Local Internal Survey.....	13
4.4.2.2 Department of the Army Safety Survey.....	14
5. EMERGENCY PROCEDURES	15
5.1 REMEDIAL ACTION USING ENGINEERING CONTROLS	15
5.1.1 Notification and Education	15

TABLE OF CONTENTS (Continued)

Section	Page
5.1.2 Engineering Control System-Contained Remedial Action.....	15
5.1.3 Emergency Response.....	15
5.1.4 “All Clear” Notification.....	16
6. KEY CONTACT PERSONNEL	17

APPENDIX A SITE MAP

APPENDIX B SITE-SPECIFIC EMERGENCY RESPONSE FLOW CHART

**APPENDIX C DISTRICT OF COLUMBIA CLUSTER 13 COMMUNITY
EMERGENCY MANAGEMENT PLAN WITH SITE
SPECIFIC RESPONSE PLANS**

APPENDIX D SITE-SPECIFIC NEIGHBORHOOD OUTREACH PLAN

**APPENDIX E SITE-SPECIFIC EMERGENCY NOTIFICATION SYSTEMS
TESTING AND OPERATIONS PLAN**

LIST OF ACRONYMS

APP	Accident Prevention Plan
AUES	American University Experiment Station
CAFS	Chemical Agent Filtration System
CBRNE CARA	Chemical Biological Radiological Nuclear and Explosives Analytical Remediation Activity
CEMP	Community Emergency Management Plan
CWM	Chemical Warfare Materiel
DCHSEMA	D.C. Homeland Security and Emergency Management Agency
DOH	D.C. Department of Health
ECBC	Edgewood Chemical Biological Center
ECS	Engineering Control Structure
EPA	U.S. Environmental Protection Agency
HAZWOPER	Hazardous Waste Operations and Emergency Response
HTW	Hazardous and Toxic Waste
IHF	Interim Holding Facility
MCE	Maximum Credible Event
MEC	Munitions and Explosives of Concern
MINICAMS	Miniature Chemical Agent Monitoring Systems
MPD2	Metropolitan Police Department District 2
MPD SOD	Metropolitan Police Department Special Operations Division
PAO	Public Affairs Office
PIP	Public Involvement Plan
PM NSCM	Product Manager for Non-Stockpile Chemical Materiel
RA	Remedial Action
RAB	Restoration Advisory Board
RCWM	Recovered Chemical Warfare Materiel
SOO	Site Operations Officer
SSHO	Site Safety and Health Officer
SSHP	Site Safety and Health Plan

LIST OF ACRONYMS (Continued)

SVFUDS	Spring Valley Formerly Used Defense Site
TEEL	Temporary Emergency Exposure Limit
TEEL-1	Temporary Emergency Exposure Limit Level 1
USACE	U.S. Army Corps of Engineers
USACE Baltimore	U.S. Army Corps of Engineers, Baltimore District
USAESCH	U.S. Army Engineering and Support Center, Huntsville
USAESCH RCWM DC	U.S. Army Engineering and Support Center, Huntsville Recovered Chemical Warfare Materiel Design Center

1. INTRODUCTION

The purpose of this Site-Specific Public Protection Plan is to inform the nearby residents living within 194 feet of the 4825 Glenbrook Road project area of the Spring Valley Formerly Used Defense Site (SVFUDS) about project-related public safety protective actions, that include preventative protective measures, physical protective measures, and emergency response protective measures. These actions would be implemented during high probability intrusive operations associated with the remedial action at 4825 Glenbrook Road. Based on the 4825 Glenbrook Road NW Decision Document (USACE 2012), the Remedial Action (RA) areas at the property were designated as high probability and low probability areas (see Appendix A – Site Map). Three areas where AUES items may be encountered during the RA will be excavated under the high probability protocols as defined in the Site Wide Work Plan. These three areas are: the backyard patio and the southern portion of the backyard retaining wall (area D); the area under the house, including the basement and foundation walls (Area E); and the front yard (area F). All three high probability areas will be excavated under a protective Engineering Control Structure (ECS) (see Section 2.4). These areas are identified as needing high probability safety protocols because the previous field operations, as well as historical and field data indicate there is a higher probability that AUES-related items could be encountered in these areas. Although munitions and explosives of concern (MEC) have been recovered during previous investigation activities at this property, MEC are not anticipated to be found during the upcoming RA efforts. As exhibited in the Site Map, the low probability operation areas are in the back of the property and the front left side where the driveway currently is located. Low probability excavation will be conducted in open air because of the thoroughness of recent operations at the site, as well as historical and field data indicate it is unlikely that AUES-related items remain in these specific areas.

Preventative protective measures that will be in place at the site include safe work practices, up-front coordination with emergency responders, well-trained experienced work force, and multi-agency oversight during the planning and remedial action. As used in previous operations at this site, the physical protective measures will include real time/ near real time air monitoring, an ECS, and three Chemical Agent Filtration Systems (CAFS) with the engineering control structure under negative pressure. The emergency response protective measures include

conservative health standards using the Temporary Emergency Exposure Limit (TEEL) to define a safety zone, response planning and readiness for a conservative maximum credible event (MCE), and a voluntary Shelter-in-Place program with communication systems and other technologies designed in partnership with the eight nearby residents within the 194-foot (TEEL-1) safety zone, to meet the notification needs of those living and working nearby.

During World War I, the AUES was established to investigate chemical agents, antidotes, and protective equipment for the U.S. Government. Recovered Chemical Warfare Materiel (RCWM) are safety hazards that constitute a potential threat to the general public, site personnel, and the environment. The safety and response procedures and neighborhood outreach plan described in this document are designed to minimize the potential risk to the community in the event of an emergency.

This Site-Specific Public Protection Plan is a stand-alone document that supports the Site-Specific Work Plan for Remedial Design/Remedial Action at 4825 Glenbrook Road (Parsons, 2012) and the Site-Wide Work Plan for the SVFUDS site. The Site-Wide Work Plan and the Site-Specific Work Plan include an Accident Prevention Plan (APP) and Site Safety and Health Plan (SSHP) Supplement for the RA at 4825 Glenbrook Road and other plans that address site-specific aspects of intrusive activities associated with RCWM at 4825 Glenbrook Road to ensure the safety of site workers, support personnel, and the public. The U.S. Army Corps of Engineers (USACE), Baltimore District, Public Affairs Office (PAO) and the project-dedicated Community Outreach Team will continue to provide information to the surrounding community on significant activities throughout the duration of operations in accordance with the Spring Valley Community Relations Plan (CRP).

This Site-Specific Public Protection Plan will be implemented during high probability intrusive activities associated with the RA at 4825 Glenbrook Road. This investigation will generally be conducted Monday through Friday from 8 a.m. to 4 p.m. A safety brief will be conducted with the site workers every morning at 6:30 a.m., followed by the start up of the equipment from 7 a.m. to 8 a.m. After investigative site work has concluded for the day, the equipment will be properly shut down and the site will be cleaned-up and secured for the evening from 4 p.m. – 5 p.m. Several overlapping safety measures will be in place at all times. For example, all excavations will take place within a tented ECS operating under negative pressure with three

CAFS to remove any chemical agents. In the unlikely event that a chemical release to the environment were to occur, anyone at eight nearby residential properties will be advised to stay inside and Shelter-in-Place (see Section 2.10 and Appendix F) until they receive the “All Clear” notification. The general public will be advised to stay clear of the area by on-site authorities (USACE’s Site Operations Officer (SOO), Metropolitan Police Department (MPD) - District 2 officers, flag guards, and others at the scene). A section of the road will be blocked and/or controlled by the on-site authorities during any emergency, and the public should obey the directions of the on-site authorities and remain clear of the area (see Site Map – Appendix A) until notified that there is no longer a threat from a chemical release before resuming normal activities.

To assist us in our non-emergency and emergency communication efforts as outlined in this Public Protection Plan, USACE Baltimore will request non-emergency and emergency contact information from individuals who reside, work, or routinely operate within 194 feet of 4825 Glenbrook Road. This impacts eight residential properties, the section of road in front of 4825 Glenbrook Road, AU’s Watkins Hall and adjacent AU playing fields. American University is organizing their own non-emergency and emergency communication needs for those nearby the project site.

USACE Baltimore will make available a voluntary Shelter-In-Place training program for individuals who reside, work, or routinely operate within 194 feet of the project located at 4825 Glenbrook Road. USACE Baltimore will make reasonable efforts through one-on-one meetings with residents that request the voluntary Shelter-In-Place program, to provide the information and knowledge, as well as emergency notification technologies needed to allow potentially affected individuals to decide for themselves whether or not to participate in the Shelter-in-Place program. American University, as in previous operations at the site, will develop their own communication plan and conduct their own emergency preparedness training for any personnel and students that could be impacted by the upcoming RA at the site.

Shelter-In-Place consists of staying indoors, closing all doors and windows, and shutting off central, or window, heat or air conditioning units. Those sheltering should remain indoors until notified that there is no longer a threat from a chemical release before resuming normal

SITE-SPECIFIC PUBLIC PROTECTION PLAN

activities. After the “All Clear” notification is sent to those participating in the voluntary Shelter-In-Place program, those in the program will be encouraged to talk directly with on-site authorities and Community Outreach Team members. Although such an event is unlikely, USACE recognizes that if an emergency did occur there would be many questions. We need to confirm that everyone is safe and not in need of medical attention. The following relevant appendices supplement this Site-Specific Public Protection Plan to support the intrusive activities during the investigation at 4825 Glenbrook Road:

- Appendix A: Site Map
- Appendix B: Site-Specific Emergency Response Flow Chart
- Appendix C: District of Columbia Cluster 13 Community Emergency Management Plan with Site Specific Response Plans
- Appendix D: Site-Specific Neighborhood Outreach Plan
- Appendix E: Site-Specific Alert/Ring-Down Systems Testing and Operations Plan

DEFINITION OF TERMS

1.1 MAXIMUM CREDIBLE EVENT (MCE)

The MCE is the maximum release of a chemical from RCWM that could occur as a result of an unintended, unplanned, accidental incident. Based on an evaluation conducted by the U.S. Army Engineering and Support Center, Huntsville (USAESCH), the MCE identified for operations at high probability areas at 4825 Glenbrook Road is the evaporative release of arsenic trichloride from a 1-liter container. The magnitude of the potential hazard depends upon the weather conditions and the type and quantity of RCWM. Based on the probability assessment conducted by USACE Baltimore and concurred by the project delivery team, MEC are not anticipated to be present in any of the high probability areas to be remediated. If items are recovered during the RA at high probability areas that are inconsistent with the MCE, work at the site will cease until the inconsistencies are resolved.

1.2 TEMPORARY EMERGENCY EXPOSURE LIMIT – LEVEL 1 (TEEL-1) DISTANCE

The Temporary Emergency Exposure Limit Level-1 (TEEL-1) distance is the distance beyond which the public will not experience irreversible or other serious long-lasting health effects, or an impaired ability to escape associated with the unlikely event of a chemical release. The predicted TEEL-1 distance calculation is based on the weather conditions, and the type and quantity of suspect RCWM. The TEEL-1 distance for the RA without engineering controls was determined to be 194 feet. However, the RA will utilize several engineering controls, including an ECS (see Section 2.2) with three CAFS, to reduce the effective TEEL-1 distance outside of the ECS to zero.

1.3 ENGINEERING CONTROL STRUCTURE (ECS)

Engineering control systems minimize exposure of on-site personnel and the nearby public in the unlikely event of a chemical release. The ECS tent selected for the RA, combined with three CAFS, is designed to prevent the release of any vapors outside of the ECS. The ECS operates under negative pressure to contain a chemical release. The CAFS is specifically designed to monitor and remove chemical agent vapors and particulates.

1.4 EXCLUSION ZONE

An exclusion zone is the operational work area where the intrusive investigation will be performed. The expected RCWM determines the size of an exclusion zone. The exclusion zone distance for a site is defined as the greater of the Minimum Separation Distance or the Maximum Credible Event (MCE)-based TEEL-1 distance. When the ECS is used, the exclusion zone distance is reduced to within the confines of the ECS where the effects of chemical agent vapors are contained, monitored, and removed.

1.5 SHELTER-IN-PLACE

Shelter-In-Place is a protective measure employed to protect the individuals who reside, work, or routinely operate within 194 feet of 4825 Glenbrook Road during an accidental release of hazardous chemicals. Shelter-In-Place consists of closing all doors and windows, and shutting off central, or window, heat or air conditioning units. If an accidental release were to occur during the project investigation hours from 8 a.m. to 4 p.m., Monday through Friday, the Shelter-In-Place protective measure would be activated by an alert notification and ring-down system. If this system is activated, the impacted individuals who reside, work, or routinely operate within 194 feet of 4825 Glenbrook Road should remain indoors until they receive the ‘All Clear’ notification or are contacted directly by onsite personnel. The “All Clear” notification and onsite personnel will inform individuals who reside, work, or routinely operate within 194 feet of 4825 Glenbrook Road that the Shelter-In-Place protective measure is over, and to resume normal activities (see Appendix E).

2. KEY AGENCY RESPONSIBILITIES

2.1 U.S. ARMY CORPS OF ENGINEERS, BALTIMORE DISTRICT (USACE BALTIMORE)

USACE Baltimore is the geographic district in charge of the overall operations at the SVFUDS, Washington, D.C. USACE Baltimore is responsible for all planning, policy implementation, project execution, and the coordination of the support agencies and contractors. USACE Baltimore will use the PAO and the project-dedicated Community Outreach Team to respond to questions as well as to communicate progress and results to the public. USACE Baltimore will make management decisions based on recommendations from USAESCH, U.S. Army 22nd Chemical Battalion (CBRNE/CARA), and Edgewood Chemical Biological Center (ECBC).

The USACE Baltimore SOO is Lowell (J.R.) Martin (or a USACE Baltimore alternate), who will provide oversight and coordination during all SVFUDS remedial action activities of suspect RCWM. Mr. Martin will field questions and coordinate support with the District of Columbia and federal agencies. In addition, the SOO will:

- Initiate the Site-Specific Public Protection Plan in the event that chemical agents are detected outside of the ECS in accordance with the USAESCH recommendations;
- Make notifications in accordance with the Emergency Response Flow Chart (Appendix B); and
- Ensure that information concerning a chemical event and subsequent emergency response efforts are provided to the District of Columbia and federal agencies.

2.2 U.S. ARMY ENGINEERING AND SUPPORT CENTER AT HUNTSVILLE (USAESCH)

The USAESCH is the Ordnance and Explosives Center of Expertise for the planning and execution of all operations in support of Spring Valley intrusive operations. The USAESCH will:

- Be on-site during the intrusive and removal activities;
- Provide safety oversight during intrusive operations within the exclusion zone; and
- Advise the USACE Baltimore SOO of any operational constraints or safety violations.

2.3 PARSONS

Parsons is the RCWM contractor, providing overall site management and coordination during field operations, including sampling, coordination of analytical samples, coordination of subcontractors, documentation of site activities, and preparation of closure report. Parsons also will supply the Site Safety and Health Officer (SSHO) who will be responsible for ensuring the RA is conducted safely and in accordance with the Site Specific Work Plan. Parsons will:

- Remove and dispose of the residence, including the home, foundations, slabs, all utilities (i.e., to include relocation and replacement as needed), driveway, sidewalks, and landscaping adjacent to the house;
- Perform low and high probability intrusive activities to safely remove CWM or HTW impacted soil, any RCWM hazards and any other AUES-related items and debris that remain within the low and high probability areas;
- Properly dispose of all solid and hazardous waste;
- Maintain a detailed accounting of all recovered materials and provide appropriate disposal and disposition of related items or waste;
- Conduct all activities in accordance with health and safety protocols to be protective of workers and the public.

2.4 U.S. ARMY PROGRAM MANAGER FOR CHEMICAL DEMILITARIZATION, OFFICE OF THE PRODUCT MANAGER FOR NON-STOCKPILE CHEMICAL MATERIEL (PM NSCM)

PM NSCM supports USACE Baltimore by providing all materiel assessment equipment and technologies. PM NSCM is responsible for arranging the interim storage and off-site transportation of RCWM at the SVFUDS, Washington, D.C. RCWM may be stored at an interim storage facility and transported off-site by the U.S. Army 22nd Chemical Battalion, or destroyed on-site using Army-approved mobile neutralization systems. The PM NSCM is responsible for destroying RCWM and other containers of hazardous industrial chemicals that may be recovered during remediation activities. PM NSCM also coordinates and arranges the training of all medical response support personnel on the treatment of CWM exposure.

2.5 CHEMICAL BIOLOGICAL RADIOLOGICAL NUCLEAR AND EXPLOSIVES (CBRNE) ANALYTICAL REMEDIATION ACTIVITY (CARA)

The Chemical Biological Radiological Nuclear and Explosives (CBRNE) Analytical Remediation Activity (CARA) provides the Department of Defense with a worldwide capability of responding to, neutralizing, and temporarily holding (until final disposal by PM NSCM) of chemical agents, munitions, and other hazardous materials. CARA will provide Explosives Ordnance Disposal personnel. CARA is responsible for:

- Working with contractors to perform the intrusive operations;
- Packaging of suspect RCWM items;
- Transporting RCWM to the Interim Holding Facility (IHF) containers;
- Responding to emergencies occurring during the on-site transport or storage of RCWM in the IHF;
- Recommending a course of action to USACE in case of an emergency;
- Assessing potential RCWM items; and
- Maintaining and operating the personnel decontamination station.

2.6 EDGEWOOD CHEMICAL BIOLOGICAL CENTER (ECBC)

During intrusive operations, ECBC will conduct the air monitoring and analysis for RCWM and agent breakdown products at the SVFUDS to ensure worker and public protection. ECBC will also be responsible for operation of the Chemical Agent Filtration System.

2.7 D.C. GOVERNMENT

The D.C. Homeland Security and Emergency Management Agency (DCHSEMA) will ensure proper coordination throughout the city government for support of intrusive investigation of activities associated with RCWM at the SVFUDS. This agency provides 24-hour emergency assistance to the public, achieved by mobilizing and deploying emergency services personnel and resources; updating emergency operation plans and strategies; training emergency personnel; managing special events; and informing the public of impending emergencies and disasters, in order to save lives and protect property in the District of Columbia.

SITE-SPECIFIC PUBLIC PROTECTION PLAN

- In the event of a chemical release, DCHSEMA and local police and fire departments would be contacted directly by the SOO as well as through USACE Baltimore's site-specific ring-down notification system, as outlined in this Public Protection Plan for the site specific remedial action.
- Metropolitan Police Department's Special Operations Division (MPD SOD) will have officers on duty at the site during intrusive operations, and during transportation of items for disposal.
- Upon activation of the ring down notification system, Metropolitan Police Department District 2 (MPD2) will have two patrol cars deployed immediately to the 4800 block of Glenbrook road, just outside of the 194-foot safety zone. During such an emergency, these officers will assist and identify all persons leaving the zone during an emergency. If an actual release has occurred, all those potentially exposed will be contacted directly to ensure their well-being.
- The local fire department will have emergency response personnel remain on stand-by duty off-site during the activities associated with RCWM at the SVFUDS. These personnel will be available to respond to any 9-1-1 calls from those inside the 194-foot safety zone during an emergency. Based on the distance of the safety zone, depicted on the Site Map (Appendix A), this potentially involves five residential homes, seven residential yards, nearby sections of the sidewalk and street, as well as Watkins Hall at American University.

The D.C. Cluster 13 Community Emergency Management Plan (CEMP) and the corresponding Site Specific Response Plans (see Appendix C) provide further information about the roles and responsibilities of these agencies during an emergency, including information about the Health Incident Command System. This system also relies on the Community-Based Clinics Emergency Preparedness Plan described in the CEMP. The D.C. Department of Health (DOH) is the lead agency for Emergency Support Function #8 of the District Response Plan. DOH is responsible for providing a range of services to the residents and for coordinating all health and medical activities in the aftermath of a disaster or other emergency.

Although no specific tasks are assigned by this plan to these agencies, USACE Baltimore will provide information and support to assist in the emergency response planning efforts of these agencies. These agencies will be participants in the planned Tabletop exercise, actual date yet to be determined.

3. PROTECTIVE ACTIONS AND PROCEDURES

3.1 SITE CONTROL AND SITE WORK ZONES

Information about site control is also presented in the Site-Specific Work Plan for the Remedial Design/Remedial Action at 4825 Glenbrook Road.

3.1.1 The Hazard Distance and Exclusion Zone (see 4825 Remedial Action Work Plan, Parsons (2012))

The hazard distance for the RA is based on the identified MCE. The hazard distance was calculated by USAESCH for a maximum temperature of 95°F, 1 m/s wind speed and atmospheric stability factor D (neutral stability in the atmosphere). The Exclusion Zone for the RA will be the footprint of the ECS, where chemical agent vapors are contained, monitored, and removed. The ECS measures 60 feet by 82.5 feet. No evacuation is planned for the operations at high probability areas as the engineering controls being used reduce the hazard distance to within the ECS.

3.1.2 The Support Zone

The support zone is considered a clean area and consists of all areas (excluding the contamination reduction zone and exclusion zone) within the fenced areas of 4825 Glenbrook Road. Visitors and administrative support staff are not permitted beyond the support zone during intrusive investigation activities, which will be conducted Monday through Friday from 8 a.m. to 4 p.m.

3.2 NOTIFICATION AND EDUCATION

Prior to the remediation activities associated with the project area, the USACE Baltimore PAO and the project-dedicated Community Outreach Team will communicate the potential hazards to the members of community who may be impacted. Key assumptions supporting the neighborhood safety education effort are as follows:

- It is the determination of the USACE RCWM experts that engineering controls proposed for the remediation will limit the calculated MCE, and any potential chemical release will be contained within the ECS tent.

- The USACE has high confidence in the redundant controls and barriers of the ECS to safely contain the effects of the MCE, yet acknowledges that non-technical concerns call for well-defined additional precautions. These concerns include the close proximity of occupied private residences and the certainty that this high-probability remediation will encounter RCWM items and AUES laboratory items.
- USACE Baltimore will make available a safety education program for those individuals who reside, or work, within 194 feet of 4825 Glenbrook Road.
- USACE Baltimore will engage in direct communication with those residents at the eight neighboring properties to ensure they understand the safety measures they need to carry out, and the risks associated with the remedial action. In addition, USACE Baltimore will provide the information needed to allow potentially affected individuals to decide for themselves whether or not to participate in the additional ring-down and alert notification system. USACE Baltimore will provide American University any assistance requested as they design and implement their communication plan for those impacted on campus.

All nearby community residents within the TEEL-1 distance of 194 feet (calculated without considering the protective measures of the engineering controls) shall be notified of the potential hazards identified in the Site-Specific Work Plan. In the unlikely event that a chemical release were to occur outside of the ECS, all at-risk residents shall be alerted to stay clear of the 194-foot zone, with the option of implementing the voluntary Shelter-in-Place program discussed directly with them.

3.3 AIR MONITORING

An air-monitoring program will be conducted by the ECBC during all CWM-related intrusive operations. Details of the air monitoring are described in the APP/SSHP Supplement (Appendix D) to the Site-Specific Work Plan for the Remedial Design/Remedial Action at 4825 Glenbrook Road and the Air Monitoring Plan (Attachment 1 to the Site-Wide Work Plan), and include:

- Monitoring equipment for each contaminant or hazard to be monitored;
- Activities to be monitored;
- Locations to be monitored; and
- Specific actions to be taken should a positive monitoring result, or “ring-off,” occur.

3.4 TRAINING

3.4.1 Personnel Training

All personnel working at the site are trained and qualified, per Department of Defense and USACE regulations.

Each supervisor engaged in the site work must have at least eight additional hours of specialized training on managing such operations, and three days of field experience under the supervision of a trained and experienced supervisor. All personnel working in the exclusion zone are required to have completed the 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER).

In addition to a medical surveillance program, all personnel receive CWM training including methods of detecting a chemical release, emergency procedures, and safe work practices. All personnel also receive site-specific training to ensure thorough understanding of the SSHP and the physical and safety hazards of the site.

3.4.2 Emergency Preparedness Drills

Prior to the start of the remedial action associated with RCWM at 4825 Glenbrook Road, all District of Columbia and site emergency response personnel will be given the opportunity to participate in surveys to test the efficiency of this Site-Specific Public Protection Plan and evaluate operational readiness.

USACE Baltimore will coordinate the local internal survey in preparation for a survey conducted by the USAESCH, Recovered Chemical Warfare Materiel Design Center (USAESCH RCWM DC) for the Department of the Army Safety Office. The surveys will be scheduled at Spring Valley and will include various emergency scenarios for the planned operation.

3.4.2.1 Local Internal Survey

The local internal survey evaluates the operational procedures and all aspects of the intrusive investigation activities. Participants include USACE Baltimore, USAESCH, CBRNE/CARA, and ECBC. Each procedure is assessed for operational readiness through the demonstration of various scenarios. The local internal survey assures compliance with all provisions of the

Chemical Safety Submission, the Site-Specific Work Plan, and U.S. Army regulations, as well as verifying operator proficiency. Procedures include:

- Review of pertinent documents.
- Inspection of equipment and facilities.
- Verification of employee training and procedures.
- Witnessing of selected system testing and operations.

The local internal survey is currently scheduled to occur prior to the start of high probability operations, immediately prior to the Department of the Army Safety Survey.

3.4.2.2 Department of the Army Safety Survey

The survey performed by USAESCH RCWM DC for the Department of the Army Safety Office is another formal review and assessment of an intrusive operation that has the potential for chemical agent exposure. Participants include USACE Baltimore, USAESCH, CBRNE/CARA, and ECBC. This survey examines operational readiness through the demonstration of various scenarios. The Department of the Army Safety Survey assures compliance with all provisions of the Chemical Safety Submission, the Site-Specific Work Plan, and U.S. Army regulations, as well as verifying operator proficiency. Procedures include:

- Review of pertinent documents.
- Inspection of equipment and facilities.
- Verification of employee training and procedures.
- Witnessing of selected system testing and operations.

Department of the Army Safety Survey is scheduled to occur prior to the start of high probability operations, following the local internal survey.

4. EMERGENCY PROCEDURES

During the remedial action, the technical team will conduct the operations using an approved ECS, where chemical agent vapors are contained, monitored, and removed.

In the event of an emergency (i.e., possible chemical release outside of the ECS), USACE Baltimore will be responsible for coordination of all assisting agencies to protect all residents, support personnel, and site workers.

4.1 REMEDIAL ACTION USING ENGINEERING CONTROLS

4.1.1 Notification and Education

All residents within the TEEL-1 distance (calculated without the engineering controls) shall be notified by the USACE Baltimore PAO and the Spring Valley Community Outreach Team of the upcoming remedial action with its potential hazards. In accordance with the Public Affairs and Neighborhood Outreach Plan (Appendix D), each impacted resident will be contacted directly. Each resident will be informed about the activities to be conducted, the date these activities are planned to take place, and how to react in the unlikely event that a chemical release occurs outside of the ECS. Also, the email addresses and telephone numbers of the Spring Valley Community Outreach Team will be provided for easy access if there are further questions or concerns.

4.1.2 Engineering Control Structure-Contained Remedial Action

Because an approved ECS will be used during the Remedial Action, the TEEL-1 distance is reduced to the confines of the ECS where chemical agent vapors are contained, monitored, and removed.

4.1.3 Emergency Response

Incidents involving an unlikely chemical release outside of the ECS (i.e. a series of detections of hazardous substances) will initiate an emergency response. In the event of an emergency (e.g., confirmed ring-off of monitoring equipment, chemical release, chemical spill), personnel inside the ECS will immediately execute mitigation activities. The USAESCH Site Safety Officer will evaluate the on-site conditions and recommend a course of action to the SSO. The SSO will

initiate the emergency notification systems and protocols (email, ring-down system, etc.), and if warranted will notify the on-site authorities, including MPD SOD, to talk with all individuals within the TEEL-1 distance directly, advising them to step away from the area. The on-site authorities will control the area, cut and pull traffic, etc., until MPD 2 officers and other emergency responders arrive to assist them.

USACE Baltimore will make a decision to continue with, or suspend, operations based upon the recommendations of the USAESCH, CBRNE/CARA, and ECBC. The USACE Baltimore SSO shall make the necessary off-site requests for assistance from the appropriate participating agencies, and provide notifications to the various support organizations according to the Emergency Response Flow Chart (Appendix B).

4.1.4 “All Clear” Notification

After the site has been returned to a safe condition, and following the recommendation of the USAESCH, CBRNE/CARA, and ECBC, with the District Department of the Environment concurrence, the USACE Baltimore SSO shall notify the impacted public and agencies by means of a ring-down and email system of the “All Clear” and to resume normal activities. Those residents who have Sheltered-in-Place will be encouraged to talk directly with on-site authorities and Community Outreach Team members, so that any personal needs of the residents can be addressed expeditiously. After-action information detailing the nature of the chemical event and subsequent local emergency response actions will be provided to the surrounding community when it becomes available.

KEY CONTACT PERSONNEL

The following personnel are designated as key contact personnel for this Site-Specific Public Protection Plan:

District Engineer

USACE, Baltimore District (CENAB-EX)
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22nd Chemical Battalion (CBRNE/CARA)

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RCWM Contractor Project Manager

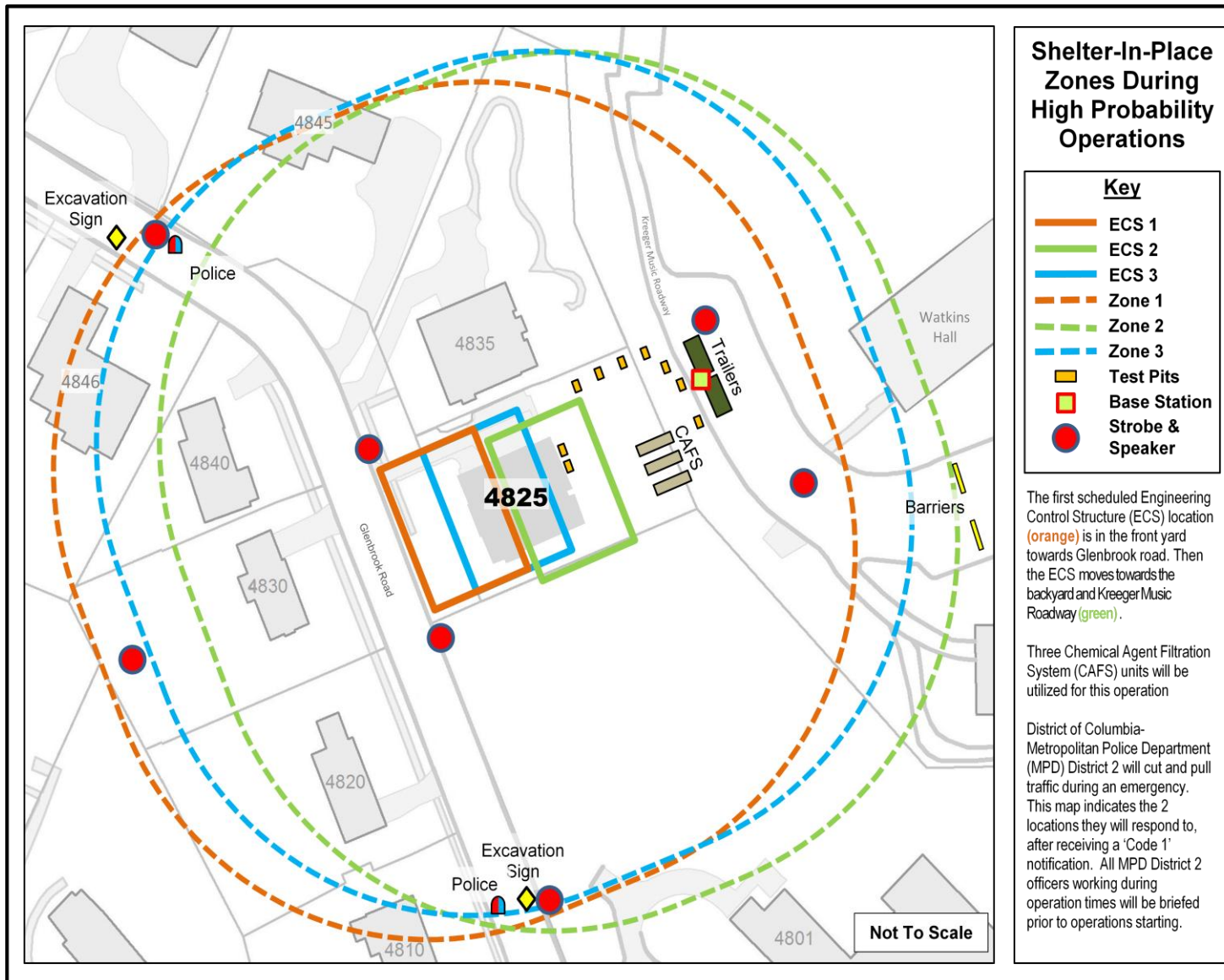
Parsons
Sean Buckley (202) 744-6970

Director of Public Safety

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APPENDIX A

SITE MAP

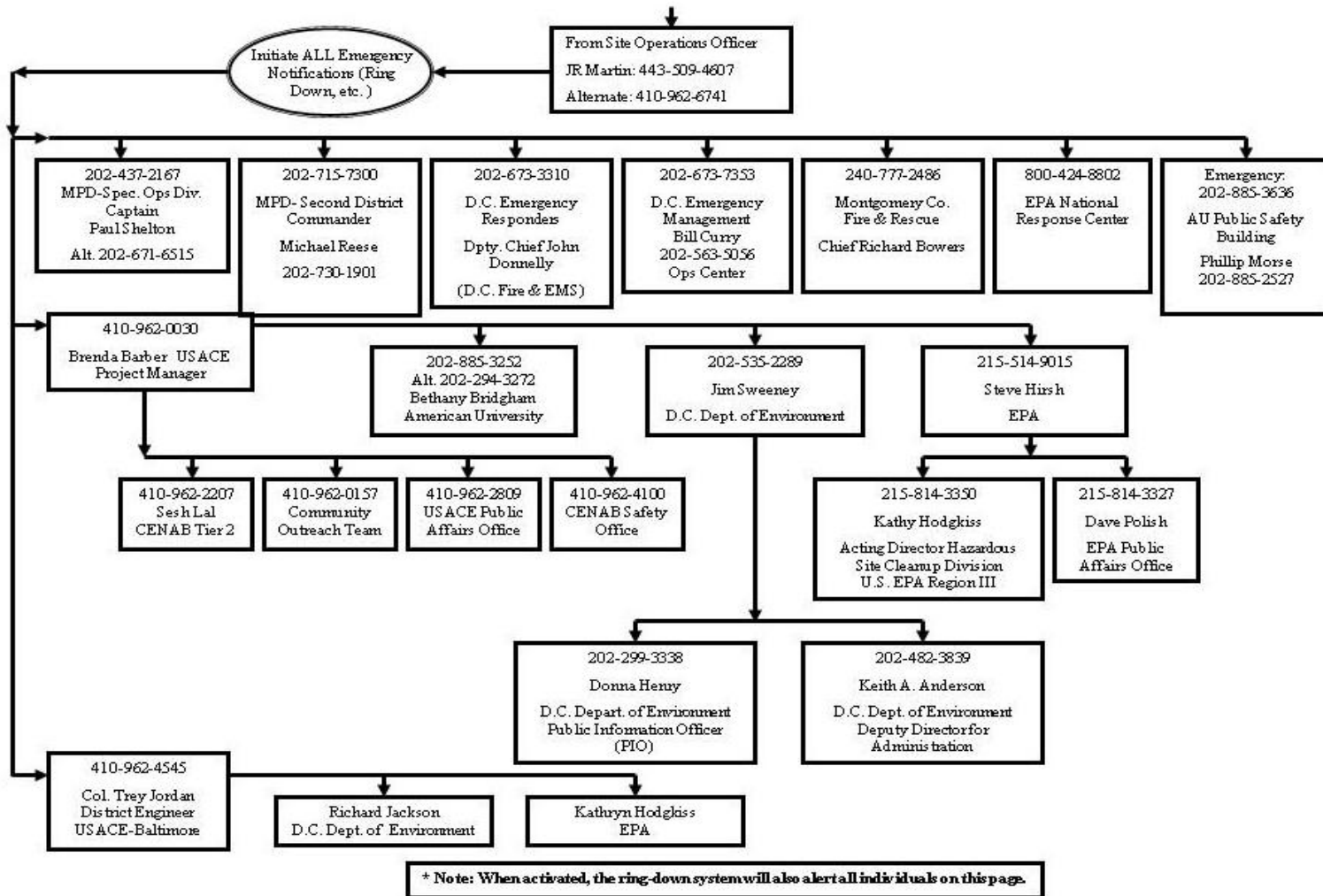


On-site authorities, including the District of Columbia MPD2, will cut and pull traffic during an emergency. This map indicates the 2 locations MPD2 will respond to, after receiving a 'Code 1' notification. All MPD2 officers working during operation times will be briefed prior to the start of operations.

APPENDIX B

SITE-SPECIFIC EMERGENCY RESPONSE FLOW CHART

SITE-SPECIFIC EMERGENCY RESPONSE FLOW CHART



APPENDIX C

**DISTRICT OF COLUMBIA CLUSTER 13 COMMUNITY EMERGENCY
PLAN WITH SITE SPECIFIC RESPONSE PLANS**

APPENDIX D
SITE-SPECIFIC NEIGHBORHOOD OUTREACH PLAN

APPENDIX D

SITE-SPECIFIC PUBLIC AFFAIRS AND NEIGHBORHOOD OUTREACH PLAN FOR 4825 GLENBROOK ROAD

1. INTRODUCTION

This Site-Specific Public Affairs and Neighborhood Outreach Plan is designed to support the remedial action at 4825 Glenbrook Road in Washington, D.C. This plan will accomplish three major objectives. The first objective is to provide to the impacted stakeholders background on the upcoming remedial action at 4825 Glenbrook Road. The second objective is to identify the mechanisms that provide current technical information to interested stakeholders, as well as opportunities to ask questions or express concerns. The third objective is to provide safety information to affected residents and workers.

This document identifies the various stakeholders and describes the outreach efforts that will be conducted throughout the project. Any community members interested in a specific outreach effort should contact the project-dedicated Community Outreach Team at 410-962-0157 or 888-393-0059.

2. STAKEHOLDERS

There are two categories of stakeholders affected by the upcoming remedial action. These groups are separated for the purposes of defining the level of outreach recommended and the basis for the different recommendations. As the Site-Specific Public Affairs and Neighborhood Outreach Plan is implemented, it is possible that any given stakeholder may request additional or less involvement. USACE Baltimore recognizes the need for such inherent flexibility and will respond to these requests as needed to keep all interested individuals informed about the planned investigation.

2.1 PRIMARY STAKEHOLDERS

The primary stakeholders are those individuals that reside, work, or otherwise engage in activities that place them within a 194 feet (TEEL-1) distance from the ECS, as defined within

APPENDIX D – SITE-SPECIFIC PUBLIC OUTREACH PLAN

the Site-Specific Public Protection Plan and established for the upcoming RA. Those present within this distance potentially could be exposed to and affected by a chemical release, if engineering controls were to fail during the RA. The planned use of engineering controls (i.e., ECS and CAFS) will reduce the actual TEEL-1 to within the confines of the engineering controls, but detailed outreach is still planned for those stakeholders closest to the work site as an extra precaution. Thus, the primary stakeholders include:

- *Occupants of homes* that are less than 194 feet from the remediation at 4825 Glenbrook Road.
- Realtors, postal and delivery personnel, and visitors.
- Service workers, such as gardeners, repairmen, housekeepers, etc.

The residents can be expected to be present on their property every day, and will need access to direct and consistent communication with the Spring Valley team. Non-residents may not come near the project area each day and may have limited concerns or interest.

2.2 OTHER STAKEHOLDERS

The other stakeholder group includes those individuals and entities that are either more integrated in the month-to-month activities of the Spring Valley project and/or serve a greater role within the community. These stakeholders usually require regular project update information and include the following:

- D.C. Council
- Advisory Neighborhood Commission
- Spring Valley Restoration Advisory Board (RAB)
- Horace Mann School and American University
- D.C. fire, police, and emergency operations
- Media

These entities receive questions and comments from a variety of Spring Valley residents and serve as a conduit for questions and concerns between the broader community and USACE Baltimore. Given the level of interest in the planned remediation efforts, this Site-Specific

Public Affairs and Neighborhood Outreach Plan includes specific plans to keep these entities well informed of the project activities schedule and the progress made.

3. OUTREACH

The planned level of outreach about the safety measures to be used is presented as a guide for outreach efforts prior to the initiation of upcoming remedial action. The time and resources invested may shift as the needs of the different stakeholder groups are more clearly identified through the working process.

3.1 DOOR-TO-DOOR CANVASSING AND OTHER OUTREACH EFFORTS

3.1.1 Primary Stakeholders

Those who live, work, or own property within the potential TEEL-1 distance require the greatest level of outreach before the remedial action starts.

Direct contact is planned for resident stakeholders to achieve the following objectives:

- Establish two-way and neighbor-to-neighbor communication and provide a personal project update to address any questions or needs.
- Outline how individuals can remain informed of progress and findings.

In preparation for these upcoming efforts, each of the resident stakeholders was contacted directly in November and December 2012.

USACE Baltimore will work with the resident stakeholders to identify any unknown primary stakeholders and provide them with an update on the project.

3.1.2 Other Stakeholders

Once the remedial action has begun, USACE Baltimore will provide detailed information about the remedial action to both the primary and other interested stakeholders through a weekly online update on the SVFUDS Web site. Also USACE Baltimore will continue providing updates at the monthly RAB meetings, face-to-face meetings with stakeholders as requested, and through the ongoing monthly project summary e-mail updates detailing site-wide efforts.

RAB meetings are open to the public and are generally held the second Tuesday of each month, from 7 to 8:30 p.m. at St. David’s Episcopal Church, which is located at 5150 Macomb Street, N.W., Washington D.C. 20016.

While the Horace Mann School would be minimally impacted during a site emergency (e.g., potential impact to a walking school bus route), USACE Baltimore recognizes the importance of keeping such an institution well informed. If Horace Mann School requires additional information and/or project briefings, the project team will coordinate directly with school officials and their representative serving on the RAB

American University, working closely with USACE throughout this remedial action, will stay informed through active participation at the inter-agency Partners meetings as well as direct contact with project management.

4. DOCUMENT AVAILABILITY

A key component of any strong Site-Specific Public Affairs and Neighborhood Outreach Plan is making the documents supporting a planned activity available prior to the start of that activity. In the case of the remediation at 4825 Glenbrook Road, the Site-Wide Work Plan for the SVFUDS, the Site-Specific Work Plan for the Remedial Design/Remedial Action at 4825 Glenbrook Road and this Site-Specific Public Protection Plan all contain key information for interested stakeholders.

The Site-Wide Work Plan is a project-wide document that contains comprehensive, technical information regarding CWM-related work in Spring Valley and the general methods for protecting workers and the broader public. This document provides an interested stakeholder a solid understanding of how USACE conducts such work.

The Site-Specific Work Plan for the Remedial Design/Remedial Action at 4825 Glenbrook Road is the document that will guide the planned investigation. The information within the Site-Specific Work Plan will include the engineering controls to be used and specific worker safety procedures. This document will provide the interested stakeholder with specific technical information on how the remedial action will be executed.

APPENDIX D – SITE-SPECIFIC PUBLIC OUTREACH PLAN

The project-dedicated Community Outreach Team is always available to receive and address any questions from stakeholders regarding these documents and convey key points to project personnel for technical follow-up as needed.

USACE Baltimore makes all of these documents available to the public through the Spring Valley Information Repository housed at the Tenley-Friendship District Library, which is located at 4450 Wisconsin Ave, N.W., Washington D.C. 20016. Documents are also available through the Spring Valley project Web site.

Mechanisms for publicizing the content and availability of these documents will include:

- Articles in *The Corps' pondent*
- RAB presentations
- Community meetings

5. SITE TOUR

It is typical to hold a series of site tours for officials, the media, interested residents living within the TEEL-1 area, and RAB members. These tours allow interested stakeholders the opportunity to inspect the technology to be used on a project and to discuss the various aspects of the project. Site tours will be tentatively scheduled for sometime after demolition, in consultation with the Site Safety Officer, during times when intrusive operations are not underway.

APPENDIX E

SITE-SPECIFIC RING-DOWN SYSTEMS TESTING AND OPERATIONS PLAN

APPENDIX E

SITE-SPECIFIC EMERGENCY NOTIFICATION SYSTEMS TESTING AND OPERATIONS PLAN

1. PURPOSE

This Site-Specific Emergency Notification Systems Testing and Operations Plan is designed to support the remediation at 4825 Glenbrook Road in Washington, D.C. The selected notification systems will be used to notify various stakeholders, informing:

- A. Impacted residents and workers in the immediate vicinity that a chemical detection has occurred.
- B. Impacted residents and workers not in the immediate vicinity that a chemical detection has occurred.
- C. Participating agencies that on-site emergency procedures have been implemented.

This plan describes the emergency communication technologies that will be used to notify public stakeholders within the TEEL-1 distance of 194 feet, participating agencies and other stakeholders in the event of a chemical detection. It also outlines the testing requirements to be met before and during the remediation efforts.

Stakeholders within the TEEL-1 distance will have been educated on how to stay clear of the area during an emergency, and follow the directions of the authorities at the scene, which includes the SOO, MPD, flag guards, and other on-site personnel.

2. NOTIFICATION MECHANISMS

Although the failure of the engineering controls to be used at the project site is highly unlikely, USACE has decided to use three notification mechanisms to notify stakeholders of a chemical detection. First, an onsite alert system will indicate a chemical has been detected and that workers and residents should either Shelter-in-Place or stay away from the area until an “All Clear” has been given. Second, authorities on-site, such as the SOO, MPD SOD and other personnel, will be able to direct any individuals nearby since the distance to the safe area is small. A phone and e-mail ring-down system will be initiated to provide an additional

APPENDIX E – SITE-SPECIFIC EMERGENCY NOTIFICATION SYSTEM TESTING AND OPERATIONS PLAN

notification of a possible emergency to agency, community stakeholders, and neighborhood residents requesting this notification. USACE will recommend participation in the ring-down phone and e-mail notification system to all residents within the 194-foot zone. Other emergency alert systems tailored to specific needs will be explored during the one-on-one meetings with each of the residents at the eight nearby properties.

2.1 ALERT SYSTEM

Alert systems will be at the project site perimeter as well as be available on a voluntary basis to the residential homes within 194 feet. The alert systems will be used to provide visual and audible emergency notification for those near or within 194 feet of the project.

2.2 PHONE AND E-MAIL RING-DOWN SYSTEM

A ring-down system has been established to notify agency, community, and nearby residential stakeholders via phone and e-mail. This system will distribute a pre-prepared emergency text message to all e-mail addresses, and a recorded voice message to all phone numbers within the pre-selected database. The message will instruct recipients to be aware of a possible emergency situation at the project site. The ring-down system can be initiated via phone or the internet, providing a backup process for initiation. Once initiated, distribution of this message should take less than 60 seconds. Individuals to be contacted via this ring-down system will include residents within 194 feet of 4825 Glenbrook Road, USACE, regulatory, emergency response personnel, and nearby hospital emergency rooms.

3. ON-SITE INCIDENT NOTIFICATION

3.1 ACTIVATION OF THE NOTIFICATION MECHANISMS

The decision to initiate the alert and ring down systems will be based on the event triggers outlined in the Site-Specific Work Plan (the APP/SSHP Supplement).

3.1.1 Initiation of the Ring-Down System

The SOO will initiate the electronic alert system which includes on-site alarm and lights, as well as a ring-down (telephone) and e-mail function to contact residents, responders and others swiftly.

APPENDIX E – SITE-SPECIFIC EMERGENCY NOTIFICATION SYSTEM TESTING AND OPERATIONS PLAN

3.2 NOTIFICATION OF STAKEHOLDERS

Stakeholder populations will receive notification during a possible incident through the notification mechanisms identified. Responses to the emergency notification will be specific for each stakeholder population and are outlined below.

3.2.1 Stakeholders within the TEEL-1

All stakeholders within 194 feet of the investigation location at the time of an incident will need to take active steps to protect themselves from a chemical exposure. This can be achieved by staying clear of the area, or Sheltering-in-Place as directed by on-site authorities.

3.2.1.1 TEEL-1 Residents

TEEL-1 residents will have consulted with the outreach team and project managers to select the best notification mechanisms for them. The ring-down phone and email system, used previously for this site, will be the primary mechanism for both those at home as well those away from the area. Prior to intrusive operations, USACE's Community Outreach Team will contact TEEL-1 residents via phone or in person to achieve the following objectives:

- A. Confirm ring-down phone numbers and e-mail addresses are correct;
- B. Discuss Shelter-in-Place procedures and determine if existing or temporary home safety systems might be incorporated into the emergency notification system
- C. Determine if any residential changes (i.e., new special subpopulation) have taken place within the home that could impact their safety during an emergency.

Subpopulations that may require special training and/or notification include children, individuals who do not speak English, individuals who are deaf and elderly persons who lack the necessary mobility to quickly stay clear of the area. Special needs will be addressed as necessary to ensure resident safety.

3.2.1.2 Transient Stakeholders within the TEEL-1

A small variety of transient stakeholders could potentially be within 194 feet of the site during intrusive activities. For instance, a resident or student walking to campus or a jogger using Glenbrook Road could find themselves within the TEEL-1 distance and need to stay clear of the area when alerted. During an emergency, on-site authorities including Metropolitan Police

APPENDIX E – SITE-SPECIFIC EMERGENCY NOTIFICATION SYSTEM TESTING AND OPERATIONS PLAN

officers and safety personnel will establish a perimeter outside the TEEL-1 distance to ensure that uninformed individuals do not enter the area.

3.3 ALL CLEAR NOTIFICATION

Those who have been notified of an emergency also will be notified that it is safe to return to normal activity. The “All Clear” notification will not be given until project personnel have confirmed that no chemical release is in the vicinity at a level that could cause harm to an individual. This signal will be given to each resident per his or her instruction, and would include a separate e-mail and recorded “All Clear” voice message that will be distributed through the ring-down system.

3.4 FALSE ALARMS

MINICAMS are prone to false positives, meaning that certain non-CWM compounds could trigger a false-positive ring-off. USACE will make every reasonable effort to avoid false-positives. If the emergency notification mechanisms are implemented, and a false positive is subsequently confirmed, the ring-down system will be used to provide the “All Clear” notification.

4. TESTING OF NOTIFICATION SYSTEM

The ring-down and alert system will need to be installed and tested before intrusive operations begin at 4825 Glenbrook Road. Additionally, the system will need to be tested periodically during ongoing operations to ensure it is still functional over time. This periodic testing also will act as a reminder to stakeholders that remedial action is ongoing and that they should refresh their memory on what their specific responses should be in the event of a possible emergency.

4.1 ALERT AND RING-DOWN SYSTEMS

4.1.1 Pre-Intrusive Testing

Prior to initiating intrusive activities, the alert and ring-down systems will be tested. The ring-down test will be performed via the internet and will address both the phone and e-mail delivery systems. This test will include certain USACE, EPA, and the District Department of the Environment representatives, selected emergency response personnel, and TEEL-1 residential stakeholders who specifically request to be included.

APPENDIX E – SITE-SPECIFIC EMERGENCY NOTIFICATION SYSTEM TESTING AND OPERATIONS PLAN

4.1.1.1 Message Preparation

Pre-recorded and pre-typed emergency notification will be completed prior to testing and intrusive activities in order to minimize the time required to activate the ring-down system in the event of a real emergency.

4.1.2 Periodic Testing

The ring-down system will allow testing of the system each morning prior to the start of intrusive operations, using a singular USACE point of contact for the test.

