

Annex G

American University Lot 18 Public Protection Plan

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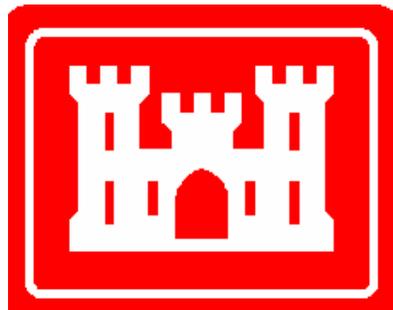
MEC/CWM Intrusive Investigation

AT

Spring Valley FUDS, Washington, D.C.

Prepared By:

**US Army Corps of Engineers
Baltimore District**



June 2005

ANNEX G

AMERICAN UNIVERSITY LOT 18

PUBLIC PROTECTION PLAN

**FOR
MEC/CWM INTRUSIVE INVESTIGATION
AT
SPRING VALLEY FUDS, WASHINGTON, D.C.**

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1 INTRODUCTION

The purpose of the Public Protection Plan (PPP) is to inform the Spring Valley Formerly Used Defense Site (FUDS), Washington, D.C. area residents of public safety protective actions to be implemented in the event of an emergency during intrusive operations associated with Munitions and Explosives of Concern (MEC) and Chemical Warfare Material (CWM). MEC and CWM are known to exist in this area (Appendix A – Site Map) formerly used by the American University Experiment Station (AUES). During World War I, AUES was involved in research and testing of chemical agents, munitions, and protective equipment for the U.S. Government. MEC and CWM are safety hazards that constitute an imminent and substantial endangerment to the general public and the environment. The comprehensive safety, response and training procedures described in this document are designed to minimize the potential risk to the community in the event of an emergency.

The PPP is part of the Spring Valley Site-Wide Chemical Safety Submission (CSS), which includes the Site Safety and Health Plan and other plans that address all aspects of intrusive activities associated with MEC and CWM to ensure the safety of site workers, support personnel, and the public. The U.S. Army Corps of Engineers, Baltimore District, Public Affairs Office (PAO) and its 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.

In accordance with the site-specific Annex G of the CSS, American University (AU) Lot 18, this PPP may be implemented during intrusive investigation of anomalies that may contain CWM. Anomaly excavation will be conducted within an Engineering Control Structure (ECS – reference PPP Section 2.2) operating under negative pressure with a Chemical Agent Filtration System (CAFS - reference PPP Section 2.2) to remove any chemical agent. If the unlikely event of a possible chemical release were to occur, the PPP will advise the public to Shelter-In-Place (SIP - reference PPP Section 2.7). SIP consists of staying indoors, closing all doors and windows, and shutting off central, or window, heat or air conditioning units. The public should remain indoors until notified that it is “All Clear” to end Shelter-In-Place and resume normal activities.

The following relevant appendices supplement this site-specific PPP to support the intrusive activities at AU Lot 18:

Appendix D: Lot 18 Public Outreach Plan

Appendix E: Siren and Ring-Down Systems Testing and Operation Plan

2 DEFINITION OF TERMS

2.1 Chemical Warfare Material (CWM)

As defined in the April 21, 2005, Munitions Response Terminology, Memorandum for the Assistant Chief of Staff for Installation Management, CWM is an item configured as a munition containing a chemical compound that is intended to kill, seriously injure, or incapacitate a person through its physiological effects. This term includes mustard and lewisite blister agents in other-than-munitions configurations. CWM does not include: industrial chemicals; riot control devices; chemical herbicides; smoke and flame producing items; or soil, water, debris or other media contaminated with chemical agent.

2.2 Engineering Control Structure (ECS)

Engineering control structures minimize exposure of personnel and the public to chemical hazards associated with CWM. The ECS operates under negative pressure with a Chemical Agent Filtration System (CAFS) to contain a chemical release. The CAFS is specifically designed to monitor and remove chemical agent vapors and particulates. The ECS selected for the AU Lot 18 intrusive investigation is a tent with a CAFS for vapor containment.

2.3 Exclusion Zone

The Exclusion Zone (EZ) is the operational work area where the intrusive investigation will take place. The suspect munition or chemical agent determines the size of the EZ where potential contamination may exist. The Exclusion Zone distance for a site is defined as the greater of the munition fragmentation distance, or the distance of no significant health effect with a chemical agent release. When the engineering control structure is used, the EZ is reduced to the confines of that engineering control structure where chemical agent vapors are contained, monitored and removed.

2.4 Maximum Credible Event (MCE)

The MCE is the maximum release of a chemical agent from a munition, bulk container, or process that could occur as a result of an unintended, unplanned, or accidental incident. The event must be realistic with reasonable probability of occurrence. The magnitude of the potential hazard depends upon the meteorological conditions and the type and quantity of CWM. The MCE selected for the AU Lot 18 intrusive investigation is the evaporative release of lewisite from a one-liter container (reference site-specific Annex G of the CSS, Section 1.5.1).

2.5 Most Probable Munition (MPM)

The MPM for a particular site in the Spring Valley FUDS is based on historical data, and as a result, no Most Probable Munition is required for the AU Lot 18 intrusive investigation (reference site-specific Annex G of the CSS, Section 1.5.2).

2.6 No Significant Effects (NOSE) Distance

The distance from the point of a chemical release beyond which the public would not experience any adverse health effects in association with a chemical agent release. The magnitude of the potential hazard depends upon the meteorological conditions, and the type and quantity of

suspect CWM. The NOSE distance for the AU Lot 18 investigation without engineering controls was determined to be 59 meters (193 feet). However, the AU Lot 18 intrusive investigation will utilize a tent engineering control structure (ECS) and chemical agent filtration systems (CAFS) to reduce the effective NOSE distance outside the ECS to zero.

2.7 Shelter-In-Place (SIP)

Shelter-In-Place is a protective measure employed to protect the public during an accidental release of hazardous chemicals. SIP basically consists of closing all doors and windows, and shutting off central, or window, heat or air conditioning units. At Lot 18, SIP would be activated by a siren and ring-down system. If activated, the public should remain indoors until notified that it is “All Clear” to end Shelter-In-Place with a siren and ring-down system (reference Appendix E).

3 KEY AGENCY RESPONSIBILITIES

3.1 U.S. Army Corps of Engineers, Baltimore District (CENAB):

CENAB is the project manager in charge of the overall operations at the Spring Valley FUDS, Washington, D.C. CENAB is responsible for all planning, policy implementation, project execution, and the coordination of the support agencies and contractors. CENAB will use the PAO and its community outreach team to communicate progress and results to the public. CENAB will make management decisions based on recommendations from U.S. Army Engineering and Support Center, Huntsville (USAESCH), U.S. Army Technical Escort Unit (TEU), the MEC contractor, and Edgewood Chemical Biological Center (ECBC).

The CENAB Site Operations Officer is Major Thomas Verell (202-360-3762) who will provide oversight and coordination during all Spring Valley FUDS intrusive investigation of suspect MEC/CWM anomalies. Major Thomas Verell will field questions concerning the PPP and coordinate support with the District of Columbia and Federal agencies. In addition, the Site Operations Officer will:

- Initiate the PPP in the event that chemical agents are detected outside of the engineering control structure in accordance with 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 surrounding community.

3.2 U.S. Army Engineering and Support Center at Huntsville (USAESCH).

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

- Be on-site during the intrusive and removal activities;
- Provide safety oversight during intrusive operations within the exclusion zone;

- Advise the CENAB Site Operations Officer of any operational constraints or safety violations;

3.3 U.S. Army Program Manager for Chemical Demilitarization (PMCD), Office of the Product Manager for Non-Stockpile Chemical Materiel (PM NSCM):

- The PM NSCM is responsible for destroying CWM that may be recovered during removal activities at the site;
- PM NSCM supports CENAB by providing Multiple Round Containers (MRCs) for containerizing CWM, the Interim Holding Facility (IHF) for storing CWM, and all munition assessment equipment and technologies;
- PM NSCM also coordinates and arranges the training of all medical response support personnel on the treatment of CWM exposure; and
- PM NSCM is responsible for arranging the interim storage and off-site transportation of CWM at the Spring Valley FUDS, Washington, D.C. CWM may be stored in an interim storage facility and transported off-site by the U.S. Army Technical Escort Unit, or destroyed on-site using Army-approved mobile neutralization systems.

3.4 U.S. Army Technical Escort Unit (TEU):

TEU is a specialized unit of the US Army Soldier and Biological Chemical Command and provides the Department of Defense with a worldwide capability of responding to, neutralizing, and disposing of chemical agent, munitions, and other hazardous materials.

- TEU is to assess intact suspect chemical items, such as glassware or munition items. If a chemical agent “ring off” (alarm - reference CSS, Volume 2, Part A, SSHP Section 11.4) occurs while air monitoring is being conducted, if a chemical munition is identified, or if an intact unknown object or materiel is encountered, TEU (and the MEC Contractor) will execute mitigation activities.
- TEU is responsible for packaging and transporting CWM that remains in original configuration.
- TEU will respond to an emergency occurring during on-site transport or storage of CWM in the Interim Holding Facility.
- In case of an emergency, TEU will recommend a course of action to USAESCH.

3.5 Edgewood Chemical Biological Center (ECBC).

During intrusive operations, ECBC will conduct the air monitoring and analysis for CWM and agent breakdown products (ABPs) at the Spring Valley FUDS to ensure worker and the public protection.

3.6 MEC Contractor

The MEC Contractor furnishes overall site management and coordination of subcontractors during field operations.

- The MEC Contractor provides the Site Safety and Health Officer (SSHO) who is responsible for ensuring the intrusive investigation of anomalies associated with MEC and CWM are conducted safely in accordance with the CSS.
- The MEC Contractor is responsible for the installation and maintenance of the engineering controls.
- The MEC Contractor provides Unexploded Ordnance (UXO) qualified personnel to perform the intrusive investigation and removal operations.
- The MEC Contractor assists TEU to execute mitigation activities if a suspect chemical item is encountered.

3.7 Local Police and Fire Departments

- The local police department will be on stand-by duty off-site during suspect MEC/CWM intrusive activities at Spring Valley FUDS. The local police will execute public access of traffic and pedestrian control with detours and barricades of the NOSE, Site Map (Appendix A).
- The local fire department will remain on stand-by duty off-site during MEC/CWM-related intrusive activities at Spring Valley FUDS.

3.8 D.C. Government

The D.C. Emergency Management Agency (DCEMA) will ensure proper coordination throughout the city government for support of intrusive investigation of anomaly activities associated with MEC and CWM.

3.9 American University (AU)

The primary American University residential campus is located within the Spring Valley FUDS. AU is an independent educational university with more than 11,000 students. In the event of an emergency during intrusive operations associated with MEC and CWM, AU will take steps to (a) assure the safety and security of the campus community; (b) communicate vital information pertaining to the emergency to the campus community; (c) coordinate with the local, regional, and federal emergency personnel responding to the emergency; and (d) resume normal operations as soon as it is safe and practical.

In the event of an emergency during intrusive operations associated with MEC and CWM, AU's emergency personnel and campus community shall rely upon the expertise of the local, regional, and federal professionals to control and abate the emergency. AU staff shall implement shelter-in-place in buildings within the NOSE. Outside of the NOSE, AU staff shall be assigned to aid in keeping vehicle and pedestrian traffic away from the NOSE boundary.

4 PROTECTIVE ACTIONS AND PROCEDURES

4.1 Site Control and Site Work Zones (reference CSS, Volume 2, Part A, SSHP Section 1.3)

4.1.1 The Exclusion Zone (EZ) for the AU Lot 18 intrusive investigation will be an engineering control structure, or tent, where chemical agent vapors are contained, monitored and removed.

4.1.2 The Contamination Reduction Zone (CRZ) is the transition area between the Exclusion Zone and the Support Zone. The CRZ includes the personnel decontamination station and the area that extends to the Support Zone boundary.

4.1.3 The Support Zone is considered a clean area. Visitors and administrative support staff are not permitted beyond the Support Zone during intrusive investigation activities.

4.2 Notification and education

Prior to suspect MEC/CWM intrusive investigation, it is necessary to communicate through the CENAB Public Affairs Office and its community outreach team the potential hazards to all persons that may be impacted. All residents within the NOSE distance (calculated without the engineering controls) shall be notified of the potential hazards identified in the site-specific annex to the CSS, and if the unlikely event of a possible chemical release were to occur outside of the ECS, the public will be notified to Shelter-In-Place.

4.3 Air Monitoring

An extensive air-monitoring program will be conducted by the Edgewood Chemical Biological Center (ECBC) during all CWM-related intrusive operations. Details of the air monitoring are described in the Site Safety and Health Plan and the Air Monitoring 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.

4.4 Training

4.4.1 Personnel Training

All personnel working in the Exclusion Zone are required to have completed the 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training, or 8-hour annual refresher course, and the Explosive Ordnance Disposal (EOD) Qualified training which details procedures for evaluation and disposal of UXO/MEC.

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 Site Safety and Health Plan (SSHP) and the physical and safety hazards of the site.

Daily morning tailgate safety meetings review specific health and safety issues, site activities for that day, changes in site conditions, and topics in the site-specific training as they apply to daily activities. Safety meetings discuss daily hazards and emergency procedures, and identify a rally point.

Each supervisor engaged in the site work must have at least eight additional hours of specialized training on managing such operations, and three days field experience under the supervision of a trained and experienced supervisor.

4.4.2 Emergency Preparedness Drills.

Prior to the start of the intrusive activities associated with MEC and CWM at Spring Valley FUDS, all emergency response personnel will be given the opportunity to participate in a Tabletop Exercise and Pre-Operational Surveys to test the efficiency of this PPP and evaluate operational readiness.

CENAB will coordinate the Tabletop Exercise and a local internal Pre-Operational Survey in preparation for a Pre-Operational Survey conducted by the U.S. Army Technical Center for Explosive Safety (USATCES) for the Department of the Army Safety Office. The Tabletop Exercise and Pre-Operational Surveys will be scheduled at Spring Valley, Washington, D.C. and will include several emergency scenarios for the planned operations.

4.4.2.1 Tabletop Exercise

The purpose of the Tabletop Exercise is to evaluate emergency plans and procedures and to resolve questions of coordination and assignment of responsibility. Participants include CENAB, USAESCH, TEU, ECBC, PM NSCM, the MEC Contractor, and the DC agencies with Emergency Management responsibilities. The Tabletop Exercise will include discussion of various simulated emergency situations in a nonthreatening format. The Tabletop Exercise was completed on May 31, 2005.

4.4.2.2 Local Internal Pre-Operational Survey

The local internal pre-operational survey evaluates the operation procedures and all aspects of the intrusive investigation activities. Participants include CENAB, USAESCH, TEU and ECBC. Each procedure is assessed for operational readiness through the demonstration of various

scenarios. The local internal pre-operational survey assures compliance with all provisions of the Chemical Safety Submission, the site-specific annex and Army regulations, and operator proficiency is confirmed. 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 pre-operational survey was completed on May 18, 2005.

4.4.2.3 DA Safety Pre-Operational Survey

The pre-operational survey performed by USATCES 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 CENAB, USAESCH, TEU, ECBC, and USATCES. This survey examines operational readiness through the demonstration of various scenarios. The DA Safety pre-operational survey assures compliance with all provisions of the Chemical Safety Submission, the site-specific annex and Army regulations, and operator proficiency is verified. 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 DA Safety pre-operational survey is currently scheduled for the week of June 13, 2005.

5. EMERGENCY PROCEDURES

On AU Lot 18, TEU and the MEC Contractor will conduct the intrusive investigation of anomalies possibly associated with CWM using an approved engineering control structure, or tent, where chemical agent vapors are contained, monitored and removed.

In the event an emergency occurs (i.e., possible release of chemical agents outside of the engineering control structure), the U.S. Army Corps of Engineers, Baltimore District (CENAB), will be responsible for coordination of all assisting agencies to protect all residents, support personnel, and site workers.

5.1 Intrusive investigation using engineering controls

5.1.1 Notification and education

All residents within the NOSE distance (calculated without the engineering controls) shall be notified by the CENAB Public Affairs Office and its community outreach team of the impending intrusive investigation with its potential hazards. In accordance with the Public Affairs Education Plan (Appendix C), a letter will notify each resident. The letter will identify the activities to be conducted, the date these activities are planned to take place, provide Shelter-In-Place instruction to remain in the residence if the unlikely event of a possible chemical release

were to occur outside of the ECS, and identify the telephone number of CENAB PAO and its community outreach team for inquiries.

5.1.2 ECS-contained intrusive investigation

When the approved engineering control structure is used, the NOSE distance is reduced to the confines of that engineering control structure where chemical agent vapors are contained, monitored and removed.

5.1.3 Emergency response

Incidents involving a possible release of chemical warfare agent outside of the ECS (i.e. a confirmed mid-bed “ring-off”, or chemical agent alarm within the filtration system) will initiate an emergency response. In the event of an emergency (e.g. confirmed ring-off of monitoring equipment, chemical warfare agent release, chemical spill), TEU will:

- Immediately execute mitigation activities;
- Evaluate the on-site conditions;
- Determine the required course of action, including whether Shelter-In-Place notification is warranted; and
- Recommend a course of action to USAESCH.

Upon the recommendation of USAESCH, CENAB will implement the PPP and execute the following:

- Notify all inhabitants within the NOSE distance with a siren and ring-down system, and advise them to Shelter-In-Place. SIP consists of closing all doors and windows, and shutting off central, or window, heat or air conditioning units. The public should remain indoors until notified that it is “All Clear” to end Shelter-In-Place by the siren and ring-down system.
- Block all roads at the NOSE distance to prevent vehicles from entering the NOSE. This will be accomplished initially with CENAB security personnel until relieved by members of the DC Metropolitan Police Department. Rockwood Parkway will be blocked at the intersection of Glenbrook Road and Nebraska Avenue (Loughboro Road), Site Map (Appendix A). CENAB security personnel shall execute traffic and pedestrian control with barricades of the NOSE at three locations on the AU campus, Site Map (Appendix A). Outside of the NOSE, AU staff shall be assigned to aid in keeping vehicle and pedestrian traffic away from the NOSE boundary.

CENAB will make a decision to continue with, or suspend, operations based upon the recommendations of USAESCH, TEU and ECBC. The CENAB Site Operations Officer 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).

5.1.4 “All Clear” Notification

After the site has been returned to a safe condition, and following the recommendation of USAESCH, TEU and ECBC, with DC Department of Health concurrence, the CENAB Site Operations Officer shall notify the public and agencies that it is “All Clear” to end Shelter-In-Place with a siren and ring-down system, and resume normal activities.

After action information detailing the nature of the chemical event and subsequent local emergency response actions will be provided to the surrounding community in accordance with the Public Affairs Education Plan (Appendix C).

6 KEY CONTACT PERSONNEL

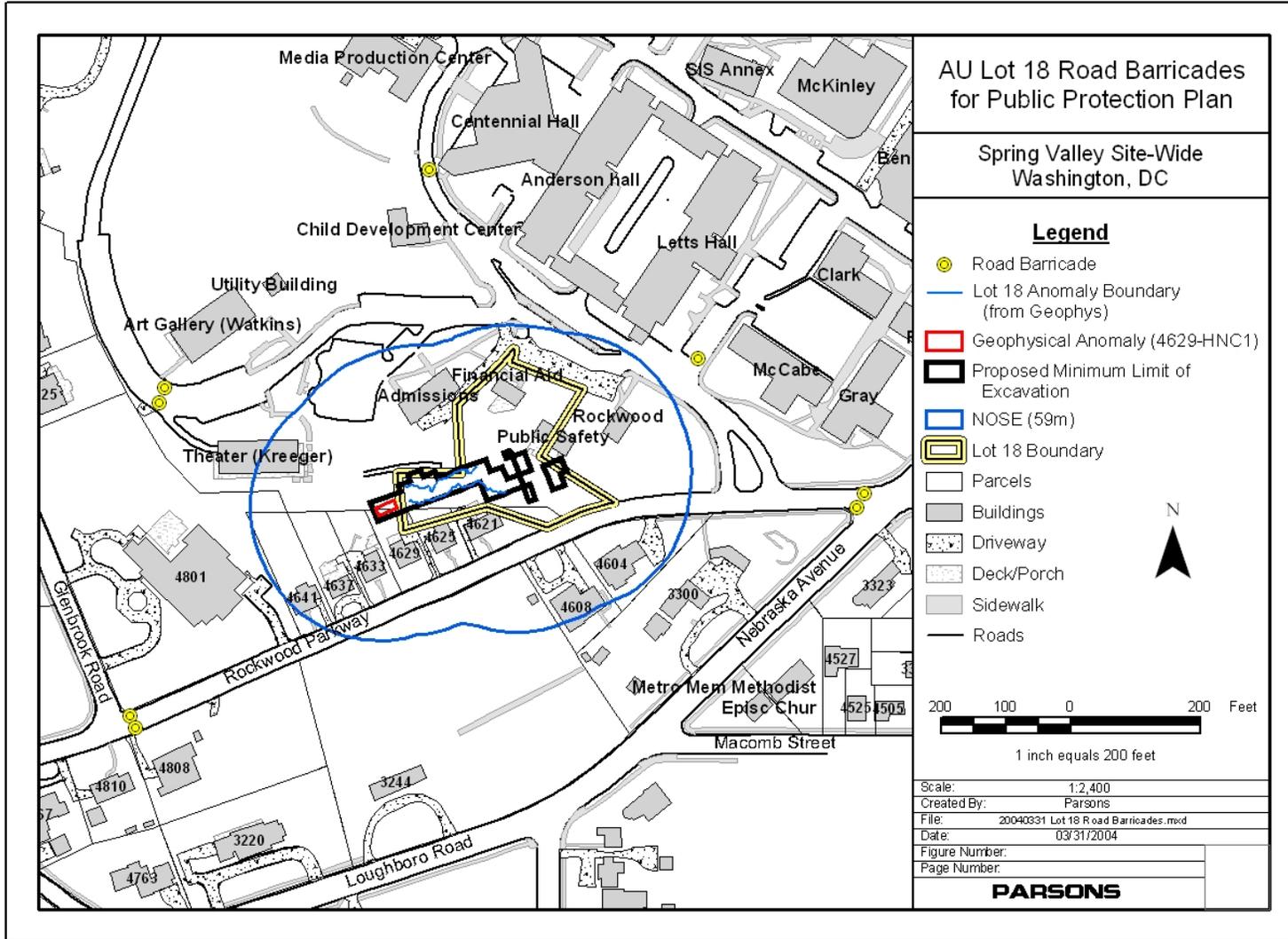
The following personnel are designated as key contact personnel for the Public Protection Plan:

- (1) Colonel Robert J. Davis (410) 962- 4545
District Engineer
Baltimore District, USA (CENAB-EX)
- (2) Major Thomas Verell 202-360-3762
Site Operations Officer
Corps of Engineers,
Baltimore District, USA (CENAB-EN)
- (3) Craig Georg 410-913-2121
MMRP Project Manager
Corps of Engineers,
Baltimore District, USA (CENAB-EN)
- (4) Gary Schilling (410) 962-2210
Spring Valley Program Manager
Corps of Engineers,
Baltimore District, USA (CENAB-EN)
- (5) Allyn Allison (256) 895-1121
Chemical Warfare Materiel Project Manager
U.S. Army Engineering and Support Center at Huntsville
Attn: Chemical Warfare Materiel Design Center (CEHNC-MEC-CW)
- (6) Mary Beth Thompson (410) 962- 4088
Public Affairs Office
Corps of Engineers
Baltimore District (CENAB-PA)
- (7) Ben Rooney (410) 962-0157
Henry & Associates, Project Manager
Corps of Engineers Contractor
Baltimore District (CENAB-EN)

- (8) John Ditillo (410) 436-4679
Deputy Director of Chemical Biological Center
Aberdeen Proving Ground (ECBC)
- (9) Michael A. Rehmert (410) 436-8524
Technical Escort Unit
Aberdeen Proving Ground (CBDCOM-TEU)
- (10) Steven Bird 410-436-4577
Product Manager for Non-Stockpile Chemical Material
Field Operations Group Leader
Aberdeen Proving Ground (SFAE-CD-NM)
- (11) Deepak Bhinge (703) 934-2305
MEC Contractor Project Manager
Parsons
Fairfax, Virginia
- (12) Michael McNair 202-885-3636
Director of Public Safety
American University

APPENDIX A

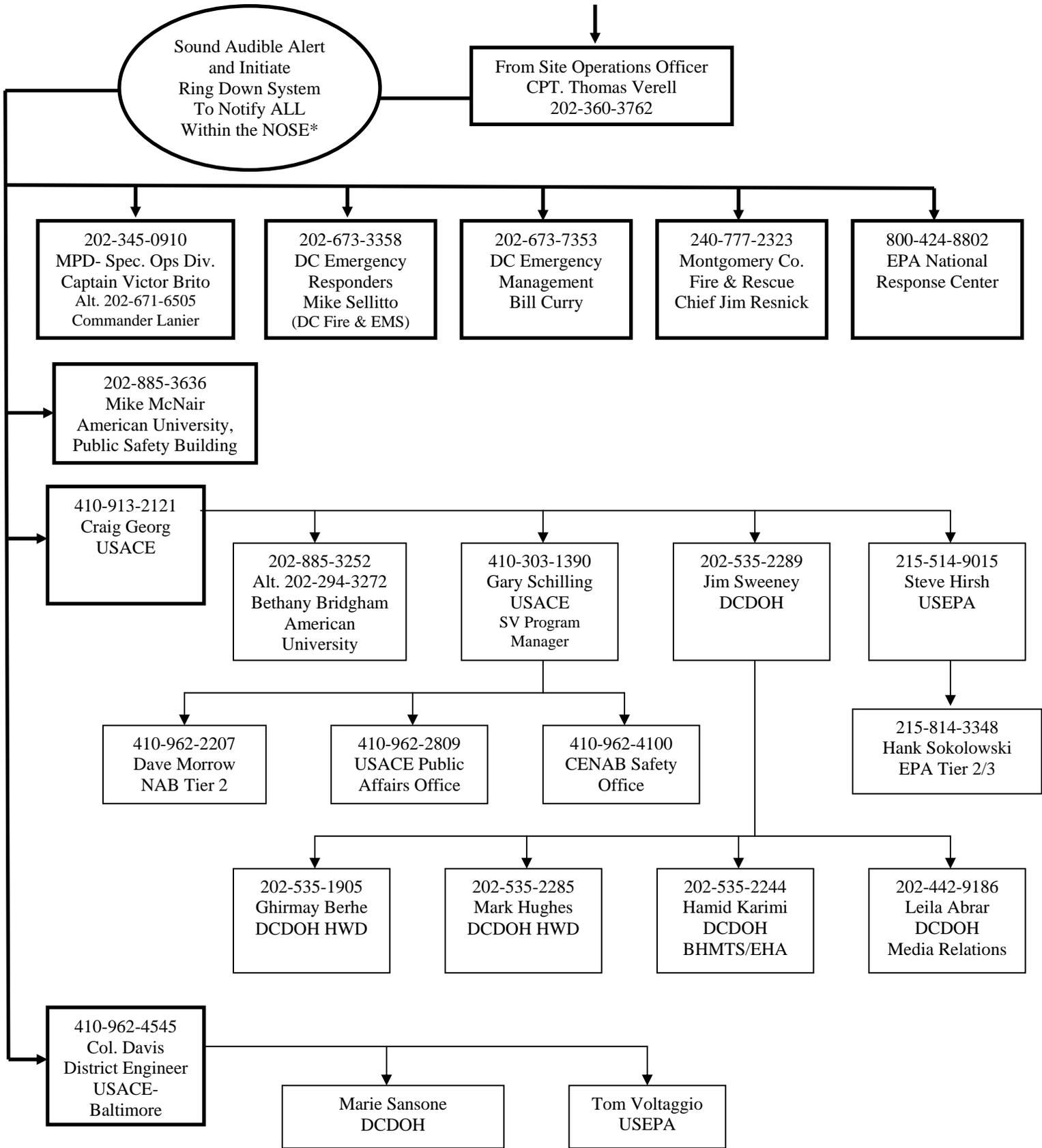
SITE MAP



APPENDIX B

EMERGENCY RESPONSE FLOW CHART

EMERGENCY RESPONSE FLOW CHART



***Note: When activated, the ring down system will also alert all individuals on this page.**

APPENDIX C

PUBLIC AFFAIRS EDUCATION PLAN

APPENDIX C

SPRING VALLEY PUBLIC AFFAIRS EDUCATION PLAN

ACTION	DATE
1. Identify list of residents within NOSE potentially impacted by Shelter-in-place.	70 days before Day E
2. Develop communications notification process to contact residents during excavation or an emergency situation.	70 days before Day E
3. Write and mail letters to residents within NOSE explaining planned excavation and possible shelter-in-place measures that may be required. Put evening meeting date and time in letter to residents.	60 days before Day E
4. Arrange meeting with residents within NOSE, as required.	60 days before Day E
5. Prepare fact sheet, Q's and A's, and flyers, if needed, to address possible questions on excavation and shelter-in-place procedures.	60 days before Day E
6. Brief RAB on excavation.	30 days before Day E
7. Coordinate any public affairs issues with other agencies.	14 days before Day E
8. Prepare and send news release discussing planned excavation and shelter-in-place measures that may be required.	3 days before Day E
9. Coordinate with site personnel in preparation for media tour.	3 days before Day E
10. Place excavation plans on toll-free project information line and web site.	3 days before Day E
11. Excavation begins.	Day E
12. Place daily updates on information line and web site on progress of excavation. Notify residents of work progress.	Day E plus ?

13. Notify affected residents at the conclusion of the excavation. Day E conclusion
Also, prepare news release, *Corps' pondent* newsletter and letter to NOSE residents thanking them for cooperation.

14. Prepare lessons learned. Day E conclusion

15. In the event of an unlikely emergency situation:

- Issue a news release;
- Staff a resident information center, Metropolitan Memorial United Methodist Church parking lot at 3401 Nebraska Avenue, to respond to event queries;
- Staff a media information center at the blockade of Rockwood Parkway and Nebraska to hold a press conference to answer media questions, if needed;
- Inform residents of the event through appropriate means, i.e., flyer, newsletter, community meeting.

APPENDIX D

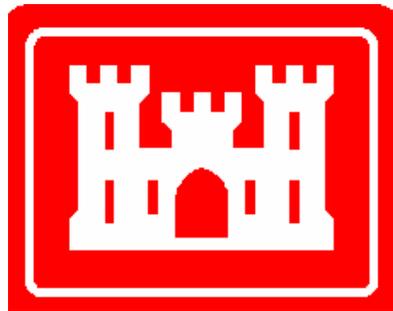
PUBLIC OUTREACH PLAN AND AMENDMENT

Public Outreach Plan **Amendment**

***Supporting the Intrusive
Investigation of Lot 18, Spring
Valley Formerly Used Defense Site
(FUDS)***

Prepared for:

**US Army Corps of Engineers
Baltimore District**



Prepared By:

**Henry & Associates, LLC
109 South Castle Street
Baltimore, MD 21231**

May 17, 2005

Lot 18 Public Outreach Plan Amendment

This Lot 18-specific Public Outreach Plan (POP), dated June 2004, an appendix to the Public Protection Plan (PPP), was designed to support the intrusive investigation of Lot 18 located on American University property along the 4600 block of Rockwood Parkway, NW, in Washington DC, which began in the summer of 2004. Intrusive operations were paused in January 2005 in order to make technical and procedural changes to improve efficiencies necessary to complete Lot 18 within an acceptable timeframe. This POP amendment has been developed to support outreach to affected stakeholders for the resumption of intrusive activities, which are scheduled to begin on June 20, 2005. This amendment only addresses the current actions planned, which are needed to reinforce the previous outreach conducted. The initial, more-detailed outreach conducted in 2004 to educate the stakeholders affected by or interested in Lot 18 is outlined in the original POP, which is attached to this amendment for easy reference.

1. Participating Stakeholders

The original POP identified the following three stakeholder groups requiring outreach:

- Group A - Primary stakeholders are those individuals that reside, work or otherwise engage in activities that place them within the No Significant Effects (NOSE) distance.
- Group B - 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. Examples include the Restoration Advisory Board and elected officials.
- Group C – All other stakeholders, who tend to be less involved in or less affected by the planned Lot 18 activities, but periodically have questions, needs and/or valuable input to provide.

There have not been any significant changes within the Spring Valley project area since the original POP was developed. In turn, these stakeholder groups remain applicable and will continue to be the focus of the Spring Valley Community Outreach Team during the upcoming Lot 18 intrusive activities.

2. Outreach

The 2004 outreach included holding community-wide, small group and one-on-one meetings, and developing specific educational materials to meet the various needs of the three stakeholder groups identified. Given the extensive previous outreach and consistent information provided to the community throughout the Lot 18 efforts, USACE does not plan to hold any additional Lot 18 meetings or produce any additional educational materials prior to the beginning of intrusive activities on June 20. Instead, outreach efforts for the upcoming work will focus on contacting each of the three stakeholder groups through already existing communication pathways. This outreach, as described below, will a) ensure the stakeholder is up-to-date on project status and upcoming efforts, and b) assess whether any follow-up meetings or additional educational materials are needed.

2.1. Group A

Outreach to NOSE stakeholders will consist of phone, mail and e-mail outreach. An update letter was sent to the NOSE residents located on Rockwood Parkway on May 3. Phone calls will also be made to the NOSE residents to ensure that all contact information is still correct, that subpopulations who will be at home during work activities have not changed and to confirm they still possess and can locate their shelter-in-place materials. Each resident will be asked if they need or would like to meet with project personnel prior to intrusive activities. Each resident will also be offered an opportunity to tour the work site once all the equipment is set up.

Concurrently, discussions are ongoing with American University to determine the best way to reach its populations. At a minimum, AU will include a notice of upcoming Lot 18 work in its bi-weekly e-mail newsletter. USACE will work with AU leadership to meet any other outreach needs that are identified.

With regard to both AU and the affected residential populations, an offer will be made to be included in the siren and ring-down test to be conducted on May 31, 2005, as outlined in the Siren and Ring-down Testing and Notification Plan, dated May 17, 2005.

2.2. Group B

Since this group is more integrated into the month-to-month Spring Valley activities than the average community member, an effort will be made to make direct contact with each stakeholder population within this group.

As for the Spring Valley Restoration Advisory Board (RAB), it receives monthly presentations to keep its members informed. These meetings will continue as the Lot 18 planning and intrusive activities progress.

The Advisory Neighborhood Commission, DC Council and other elected officials receive monthly Lot 18 updates through USACE's monthly project updates, which are e-mailed to all interested elected officials. In the May update, it will be stressed that the Lot 18 intrusive work is about to resume and will invite the recipients to call the Community Outreach Team if they have additional questions or would like to set up a meeting regarding the upcoming work.

Other special Group B stakeholders identified, such as Horace Mann School will receive a call from the USACE's Military Munitions Response Program project manager to make sure they are aware of the upcoming start date and to determine if any follow-up action is needed.

2.3. Group C

The broader Spring Valley project community is mailed the Corps'pendent, the Spring Valley project newsletter, approximately every 4-8 weeks. The April/May edition will be mailed on May 20 and will include a brief article on the upcoming Lot 18 work and the siren test to be conducted on May 31.

In addition to the direct outreach to Group C stakeholders, a Media Day has been scheduled for June 17. The press release announcing this event and resulting coverage will provide a second layer of broad notification to the community that intrusive activities are about to resume.

3. Document Availability

No public comment period was held for the Lot 18 work Plan (Annex G), which was finalized on April 18. Three major factors were considered in making this decision. First, Annex G has been developed collaboratively through the Tier 1 Partnership, including input from public stakeholders that are regular Tier 1 participants, namely the current chairperson for ANC 3D and the RAB's technical advisor. Second, the main engineering controls and air monitoring technology to be used on site have not changed significantly. Third, very few comments were received from the community during the public comment period for Annex F, the Lot 18 Work Plan guiding the 2004 work. Electronic copies of the final Annex G were offered to the RAB and a copy will be placed in the Palisades Library in May.

While no formal comment period will be held for the PPP, draft final copies have been circulated to both the partners and interested RAB members. Once finalized, the PPP also will be placed in the Palisades Library.

4. Points of Contact

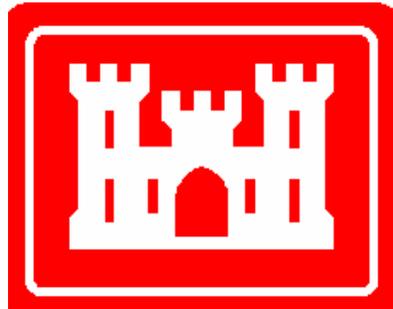
For follow-up questions regarding the planned outreach activities surrounding Lot 18, please contact Ben Rooney, Henry & Associates' Community Outreach Project Manager, at 410-962-0157. For inquiries regarding Media Day and other press-related issues, please contact Mary Beth Thompson, USACE Baltimore District Public Affairs, at 410-962-4088 or 800-494-0988.

Public Outreach Plan

Supporting the Intrusive Investigation of Lot 18, Spring Valley Formerly Used Defense Site (FUDS)

Prepared for:

**US Army Corps of Engineers
Baltimore District**



Prepared By:

**Henry & Associates, LLC
109 South Castle Street
Baltimore, MD 21231**

June 2004

Lot 18 Public Outreach Plan

This Lot 18-specific Public Outreach Plan (POP) is designed to support the intrusive investigation of Lot 18 located on American University property along the 4600 block of Rockwood Parkway, NW, in Washington DC. This POP will accomplish three major objectives. First, directed community outreach to the identified stakeholder groups will provide a thorough background on Lot 18 work to date, including the discovery of the chemical warfare agent Lewisite, in the summer of 2003. Second, this POP will provide the mechanisms needed to provide detailed technical information to interested stakeholders and provide them an opportunity to ask questions or express concerns pertaining to the associated work plans. Third, the POP will provide affected residents and students the key Shelter-in-Place information, which they will need to implement if engineering controls fail and there is a release of chemical agent or other hazardous chemicals.

The following document identifies the various stakeholders, describes the series of meetings that will be held, and outlines planned document availability and public review that will allow particularly interested or concerned residents to review the planned Lot 18 work and provide the Baltimore District their comments and concerns. Additionally, a schedule is provided as Attachment A, which outlines approximately when the various outreach plans will occur. Given that a significant amount of coordination is needed between the participating regulatory agencies and the various stakeholders, the dates provided are estimates and likely to shift as planning evolves. In turn, any person interested in a specific outreach effort should contact Mary Beth Thompson at 800-434-0988 or Ben Rooney at 410-962-0157.

1. Participating Stakeholders

There are three major categories of stakeholders affected by or participating in the cleanup of Lot 18. These three groups are separated for the purposes of defining the level of outreach recommended and the basis for the different recommendations. As the POP is implemented, it is quite possible that any given stakeholder may request additional or less involvement. The Baltimore District recognizes the need for such inherent flexibility and will respond to these requests as needed to keep all interested individuals informed and integrated with the planned excavation.

1.1. Group A Stakeholders

The primary stakeholders are those individuals that reside, work or otherwise engage in activities that place them within the No Significant Effects (NOSE) distance, as defined within the Public Protection Plan and established within Annex F (Lot 18 Work Plan) of the Chemical Site Safety Submission. The *potential* NOSE distance for Lot 18, if no engineering controls were used, would be 59 meters (194 feet). Those present within this distance could be exposed to and affected by a chemical release, if engineering controls were to fail during excavation of chemical warfare materiel (CWM). The planned use of engineering controls (i.e., a protective tent and air filtration system) will reduce the *actual* NOSE to within the confines of the engineering controls, but detailed outreach is still planned to those stakeholders closest to the work site as an extra precaution. Thus, the primary stakeholders include:

- *Occupants of homes* that are less than 59 meters from the Lot 18 dig site, and
- *AU individuals* who work in or otherwise utilize the five buildings located within the potential NOSE, if engineering controls failed.

There are several significant differences between the residential and university populations, and each population will require different outreach efforts. For instance, the residents can be expected to be present on the property everyday and will need direct and consistent communication with the Spring Valley team. For AU personnel, several subpopulations may use the facilities within the potential NOSE each day (e.g., employees within the Public Safety building), while other AU groups (e.g., students) will visit or traverse this portion of campus on a more limited basis. In turn, AU has its own internal process for education and outreach that will need to be integrated with USACE outreach. AU will take the lead in determining and executing the outreach education necessary in preparation for Lot 18 intrusive activities. The level of outreach necessary will be directly dependent on AU's final determination regarding its own use of pre-evacuation, emergency notification with shelter-in-place, or a combination of the two. USACE will provide the necessary support as requested to ensure AU populations are informed and protected before intrusive operations begin.

Additionally, AU may be more dependent on the siren notification system, while residents may well prefer the e-mail and phone ring-down system as an additional notification mechanism to be used in

conjunction with the siren system. Such significant differences in stakeholder needs are being identified and addressed throughout the technical and outreach planning of Lot 18 work.

1.2 Group B Stakeholders

The second 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 Group B stakeholders usually require more regular project update information and include the following:

- DC Council
- Advisory Neighborhood Commission
- Spring Valley Restoration Advisory Board (RAB)
- Horace Mann School

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 the Baltimore District. Given the level of interest in the planned Lot 18 efforts, this POP includes specific plans to keep these entities well informed of the project activities schedule and the progress made.

1.3 Group C Stakeholders

Group C includes all stakeholders not listed in Group A or Group B. These stakeholders tend to be less involved in or less affected by the planned Lot 18 activities, but periodically have needs and valuable input that should be addressed in order to maintain an inclusive and transparent process. Group C includes:

- Property owners whose homes are outside the potential NOSE (calculated without considering the planned engineering controls), but portions of their property falls within the NOSE
- Other residents who live within the Spring Valley project boundary
- Other elected officials
- Other interested individuals

2. Outreach

The planned level of outreach in both meetings and educational materials provided are presented as a guide for outreach efforts prior to the initiation of Lot 18 intrusive activities. The time and resource invested may shift as the needs of the different stakeholder groups are more clearly identified through the working process.

2.1. Meetings

A series of small group and community-wide meetings are scheduled to provide the various stakeholders the access needed to understand the planned efforts and reach an acceptable level of comfort. These outreach meetings are targeted to the needs of the different stakeholder groups.

2.1.1. Group A

Those who live, work, own property or go to school within the potential NOSE require the greatest level of outreach before Lot 18 excavation resumes. Two small group meetings followed by an SIP Open House are recommended to achieve the following objectives:

- Establish two-way communication and provide a Lot 18 progress update
- Address identified concerns and complete SIP education
- Resolve any remaining concerns and outline how individuals can remain informed of progress and findings

In preparation for these upcoming meetings, an initial letter and *Lot 18 Planning Project Update* was sent to Group A stakeholders in January 2004.

Future AU involvement will include attending periodic working meetings to develop the Public Protection Plan and a series of on-campus meetings to support AU efforts to educate their four subpopulations, specifically AU Public Safety personnel, Staff, Students and Building Marshals, on Lot 18 and SIP. Final outreach plans on campus will be determined by AU, noting that Baltimore District and the regulatory agencies will confirm that AU's approach meets public protection needs identified by the Partnering agencies.

For the residents along the 4600 block of Rockwood Parkway, Baltimore District and regulatory representatives will contact NOSE residents in March to initiate discussion on Lot 18 plans and identify early questions and concerns. In April, a more detailed meeting will be held to answer initial questions and conduct target SIP training. These meetings will either be held at the Spring Valley Resident Office trailer, located at 5201 Little Falls Road, Washington DC 20016, or at the homes of individual residents, which will be determined during meeting coordination efforts at that time. In May, the NOSE residents will once again have the opportunity to discuss the project at the planned Site Tour for Lot 18.

Additional one-on-one support meetings will be held as requested to meet individual needs both for the community NOSE properties and stakeholders on AU campus, unless AU chooses to move occupants of the potentially affected buildings.

2.1.2. Group B

Given their respective roles and the services they provide to the broader community, the Baltimore District is offering monthly meetings for interested Group B stakeholders to discuss Lot 18 work plans, stakeholder needs and next steps. For elected officials, this would come in the form of monthly update meetings to supplement the monthly project updates that are produced on or about the 15th of every month. E-mail recommendations have been sent offering such regular meetings.

For the RAB, monthly Lot 18 updates were initiated at the December 2003 RAB meeting. These monthly Lot 18 presentations will become more detailed in the upcoming months, as the supporting documents become available for presentation and review. A detailed Lot 18 presentation and discussion will be the sole focus of the April 13 RAB meeting. RAB meetings are open to the public and held from 7 to 9:30 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 Lot 18 emergency (e.g., potential impact to a bus route), the Baltimore District recognizes the importance of keeping such an institution well informed. A Lot 18 introductory letter has already been sent outlining the upcoming work. In follow-up, an information presentation will be offered to school officials in April. Whether Horace Mann School requires follow-up information and/or additional meetings will be coordinated directly with school officials.

2.1.3. Group C

A community-wide meeting will be held April 19 to provide all interested stakeholders an overview of Lot 18 plans and how SIP is being used on this specific project. While it will not be necessary for the broader community to SIP in the unlikely event of a release at Lot 18, providing a thorough presentation on the protective measures in place is crucial to general understanding of the Lot 18 approach. This community-wide meeting will be held at the Metropolitan Memorial United Methodist Church, 3401 Nebraska Ave., NW, Washington DC 20016.

2.2. Educational Materials

A series of educational materials will be developed to supplement the in-person outreach described above. These materials will address A) ordinance and technical Lot 18 issues, and B) SIP and public safety.

2.2.1. Munitions and Explosives of Concern (MEC) and Lot 18 Plans

The Baltimore District has generated a variety of fact sheets to support previous Spring Valley efforts. In support of Lot 18, previously generated fact sheets will be updated as appropriate and re-distributed to community members through various mechanisms. Existing fact sheets that may be used include:

- *Spring Valley Ordnance Cleanup: Past, Present and Future*
- *The Investigative Process: Ordnance and Chemical Agent Containers*
- *Quick Reference for Contractors and Workers in Spring Valley, Fort Gaines and AU Park*
- *Spring Valley Area Cleanup and Safety Suggestions*

Additionally, a fact sheet will be generated to outline the three major documents guiding the Lot 18 work, which will support the document availability and public review efforts described below. These fact sheets will describe:

- Chemical Site Safety Submission (CSS)
- Public Protection Plan (PPP)
- Lot 18 Work Plan (Annex F)

As discussions progress with the various stakeholders, it is possible that an additional fact sheet(s) may be produced. For instance, a fact sheet outlining the various safety precautions that will be used on site may prove useful to concerned residents.

2.2.2. Shelter-in-Place

SIP is being offered to individuals who will be present within the potential NOSE during work activities, in the unlikely event that engineering controls fail and a chemical release occurs. Teaching SIP will require clear and concise educational materials that will be easily accessible in the event SIP is needed. The following products will be produced:

- SIP Brochure
- Household SIP Checklist

In support of producing these materials, a simple questionnaire will be developed for meetings with NOSE residents in April. This will help the Baltimore District identify those likely to be home during the day and better target the educational information for those individuals. Note that this information may also be useful as the project team works through technical issues regarding the siren and ring-down notification systems.

3. Document Availability and Public Review

A key component of any strong POP is making the documents supporting a planned activity available prior to the start of that activity. In the case of Lot 18, the CSS, Project-wide and Lot 18-specific PPPs and Annex F all contain key information for interested stakeholders.

3.1. Document Availability

The CSS and Project-wide PPP are project-wide documents that contain comprehensive, technical information regarding ordnance and CWM-related work in Spring Valley and the general methods for protecting workers and the broader public. These documents will provide an interested stakeholder a solid understanding of how the Corps of Engineers conducts such work. In turn, the Baltimore District will make both of these documents available to the public as soon as they are completed, by placing them in the Spring Valley Administrative Record File housed at the Palisades Library, which is located at 4901 V Street, N.W., Washington D.C. 20007. Additionally, USACE will do its best to meet individual requests for electronic copies of these supporting documents during the public review period. Copies of these documents can be requested by calling the toll-free Spring Valley Information Line at 1-800-434-0988.

Mechanisms for publicizing their content and availability will include:

- Announcement in the Corps' pondent
- Announcement in the NW Current
- RAB presentation
- Community-wide Meeting presentation

- Summary fact sheets on both documents

Given that these documents are project-wide in nature, a public review period is not planned for these documents. Nevertheless, the Spring Valley 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.

3.2. Annex F Public Review

Annex F is the Lot 18 work plan that will guide the planned excavation. The information within Annex F will include the engineering controls to be used, Lot 18 specific worker safety procedures, etc. In turn, a 21-day review period is planned to begin on April 14 and close on May 5, 2004, providing interested public stakeholders the opportunity to submit questions and concerns regarding the technical approach to be used during the Lot 18 excavation. Responses to questions and concerns received during the review period were presented at the May 11, 2004 RAB meeting, which was held from 7:00 – 9:30 PM at St. David's Episcopal Church and open to the public. Additionally, follow-up discussions will be possible at the SIP Open House tentatively scheduled for May 18.

4. Technology and Process Review

In the week prior to starting intrusive operations, it is typical to hold a media day to allow interested television, radio and print media the opportunity to inspect the technology to be used on a project and discuss the various aspects of the project. The media will be given a site tour on June 18.

In addition to inviting the media, separate tours will be set up for RAB members and within-the-NOSE residents, and AU representatives will be offered on June 17, so each group can personally observe the work site and the engineering controls and ask any questions they might have.

Lot 18 POP Milestone Tables

The following tables outline all major Lot 18 milestones regarding Project Documents (Table 1), Meetings (Table 2), Planned Outreach Support (Table 3) and Logistics of Community Interest (Table 4). **Please note that the dates provided are target dates, identifying the approximate week during which the milestone will be met. During actual implementation of this POP, many or all of these dates may shift as a result of schedule coordination, the identification of additional support steps to be taken prior to completing the milestone, etc.** Please contact Mary Beth Thompson at 800-434-0988 or Ben Rooney at 410-962-0157 if interested in the status of a specific outreach effort.

Table 1: Documents

Category	Milestone	Date
CSS-PPP	Complete SIP Appendix	13-Feb
	Complete Draft Project-wide Public Protection Plan (PPP)	5-Mar
	Complete CSS (Amendments 4 & 5)	1-Apr
Lot 18-specific	Complete Draft Final Public Outreach Plan	5-Mar
	Complete Draft Final Lot 18 PPP	13-Mar
	Complete Draft Final Annex F	5-Apr
	21-day Annex F Public Review Period to identify questions and concerns begins	14-Apr
	Public Review Period ends	5-May

Table 2: Meetings

Category	Milestone	Date
Group A	Lot 18 meeting with AU populations	25-Mar
	Initial meeting with residents within the NOSE	7-Apr
	SIP meeting with AU populations	15-Apr
	Small group mtg. with NOSE residents	27-Apr
Group B	RAB presentation on SIP plans and mechanisms to be used	10-Feb
	Lot 18 RAB Update	9-Mar
	Update mtg. to elected officials	17-Mar
	Update mtg. to elected officials	7-Apr
	Lot 18 RAB Update	13-Apr
	Elected officials update mtg.	5-May
	RAB Presentation on Responses to Public Comments	11-May
Groups A & B	Site Tours	17-June & 18-June
Groups A, B & C	RAB Meeting on Lot 18 (<i>RAB meetings are open to the public</i>)	13-Apr
	Community-Wide Project Update Meeting, including Lot 18 Planning and SIP	19-Apr
	RAB Presentation on Responses to Public Comments	11-May
Partners	Status meeting with DC and AU	21-Jan
	Discuss status of PPP and Lot 18 SIP at Partners meeting	27-Jan
	Status meeting with DC and AU; Tour of buildings and areas within the NOSE	5-Feb
	Partnering Meeting update	2-Mar
	Partnership PPP and POP comments review	18-Mar
	Partnership meeting update	30-Mar
	Status meeting with DC and AU	8-Apr
	Status meeting with DC and AU	22-Apr
	Partnering meeting update	17-May & 18-May

Table 3: Outreach Support

Note	Milestone	Date
Letter	Initial Outreach Letter to all identified stakeholders	31-Jan
Announcement	Corps'pondent introduction to Lot 18 planning	1-Mar
	Announcement of Community-wide meeting in NW Current	7-Apr & 14-Apr
	Corps'pondent announcement of Community-wide meeting, Summary of SIP and planned public review period	1-Apr
	Annex F Review Period Notices in NW Current	14-Apr & 21-Apr
	Corps'pondent update on progress and announcement of start date	1-May
	Special Lot 18 Corps'pondent summarizing public comments, RAB discussions and announcing Open House for SIP	15-May
	Press Release announcing Site Tours (including Media)	7-June
Fact sheet	Complete updates on existing fact sheets	21-Mar
	Complete new fact sheet(s)	28-Mar
SIP	Complete SIP brochure	24-Mar
	Complete SIP Questionnaire	30-Mar
	Complete SIP checklist	14-Apr

Table 4: Logistics of Community Interest

Note	Milestone	Date
Notification	Compile source, costs, applicability and time to implement for siren system	27-Jan
	Compile source, costs, applicability and time to implement for e-mail and phone ring down system	27-Jan
	Finalize timeline to obtaining necessary services	3-Feb
	Complete Generic Ring-down system flow chart and SOW	13-Feb
	Complete testing plan and schedule for notification systems	30-Apr
	Complete testing of notification systems	Week of 7-June
Mobilization	Personnel mobilization and training	Begin 17-May
	Tabletop Exercise and Huntsville Survey	Week of 7-June
	Dept. of Army Pre-Operational Survey	Week of 14-June
	Start Lot 18 Intrusive Activities	21-June

APPENDIX E

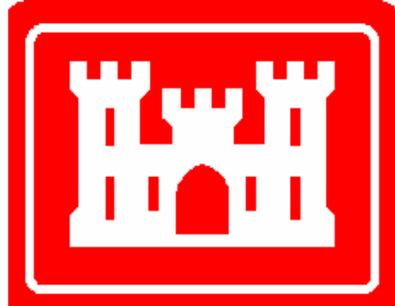
LOT 18 SIREN AND RING-DOWN SYSTEMS TESTING AND OPERATIONS PLAN

Siren and Ring-down Systems Testing and Operations Plan

***Supporting the Intrusive
Investigation of Lot 18, Spring Valley
Formerly Used Defense Site (FUDS)***

Prepared for:

**US Army Corps of Engineers
Baltimore District**



Prepared By:

**Henry & Associates, LLC
109 South Castle Street
Baltimore, MD 21231**

May 17, 2005

Lot 18 Siren and Ring-down Systems Testing and Operations Plan

1. Purpose

This Lot 18-specific Siren and Ring-down Systems Testing and Operations Plan is designed to support the intrusive investigation of Lot 18 located on American University property along the 4600 block of Rockwood Parkway, NW, in Washington DC. Both siren and ring-down systems will be used at Lot 18 to notify various stakeholders, informing:

- A. *Residents and AU populations in the immediate vicinity that they should shelter-in-place (SIP) to minimize their potential exposure to a possible release of recovered chemical warfare materiel (RCWM).*
- B. *Participating agencies that on-site emergency procedures have been implemented.*
- C. *Stakeholders beyond the immediate vicinity not to enter the affected area.*

Community stakeholders who will need to respond to the notification and protect themselves are those present within 59 meters of the dig site at the time of the incident. This distance of concern is known as the No Significant Effects (NOSE) distance and is based on the Maximum Credible Event (MCE), a 1-hour release of 1-liter of Lewisite, as identified in Annex G, the Lot 18-Specific Work Plan, of the Site-wide Chemical Safety Submission. The notification mechanisms described in this plan are essential to ensuring public safety. These key project concepts to protect the public are also discussed in the Lot 18 Public Protection Plan (PPP).

This plan describes the siren and ring-down approaches that will be used to notify agency and public stakeholders in the event of a possible chemical release. It also outlines the testing requirements to be met before and during the excavation efforts. Equally important, this plan addresses the public outreach necessary to inform the surrounding neighborhood about the testing and how to recognize an actual emergency notification.

2. Notification Mechanisms

While failure of the engineering controls to be used at Lot 18 is remote, the U.S. Army Corps of Engineers has decided to use two separate notification mechanisms to notify stakeholders of a possible RCWM release. Initiation of an on-site siren by the Site Operations Officer (SOO) will be the primary mechanism for alerting residents within the NOSE that they should initiate SIP procedures. This siren will also notify transient stakeholders (e.g., those traveling along the 4600 block of Rockwood Parkway) that they should leave the vicinity. A phone and e-mail ring-down system will also be initiated to provide a secondary notification of a possible emergency to agency and community stakeholders.

2.1. Siren System

An omni-directional outdoor warning siren will be used to provide emergency notification for Lot 18. The siren produces a 102 decibel reading at 100 feet and is mounted approximately 25 feet above the ground at two separate locations to ensure all stakeholders within the NOSE will be able to hear the siren. The siren system has an electrical power supply and will emit one of two distinct sounds upon activation:

- 🔊 the **wail-type sound** will indicate an emergency and the need to SIP and will consist of an ascending tone for 8 seconds followed by a descending tone for 4 seconds;
- 🔊 a **steady tone** will be emitted to signal the "All Clear", meaning that the emergency situation has ended.

2.2. Phone and E-mail Ring-down System

A ring-down system has been established to notify agency and community 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 begin SIP procedures as a result of a possible emergency situation at Lot 18. 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. The total number of individuals to be contacted via this ring-down system will be approximately 115 individuals,

consisting of AU representatives, community stakeholders and USACE, regulatory and emergency response personnel.

3. On-site Incident Notification

3.1. Activation of the Notification Mechanisms

The decision to initiate the alarm will be based on the event triggers outlined in table 5.1 on page 5-3 in section 5, public protection plan summary of the Site Wide Chemical Safety Submission, Site Specific Annex G- American University Lot 18 Revision 2 Final report dated 18 April 05. Specifically, a confirmed ring-off of the MINICAMS unit within the engineering control structure (ECS), monitored at the pre-filter, followed by a ring-off of the MINICAMS unit in the mid-bed of the Chemical Agent Filtration System (CAFS) will be interpreted to indicate that chemical agent is present and has the potential to escape into the environment. The detection by the mid-bed MINICAMS does not indicate a confirmed chemical release. Nevertheless, proactive notification procedures will be implemented at this point. While the second filtration unit may well capture the suspected agent detected by the mid-bed filter, USACE and its regulatory partners have agreed to this conservative interpretation of the MINICAMS ring-offs to ensure the public is well protected. It should also be noted that the Huntsville safety specialist will notify the SOO of any alarm ring-off. This preliminary notification will increase the preparedness and reduce the response time of the SOO in the event that the mid-bed ring-off does occur and emergency stakeholder notification becomes necessary.

3.1.1. *Sounding of the siren*

If the detection equipment indicates the possible presence of agent, the SOO will immediately communicate with the Huntsville safety specialist and on-site technical personnel from the U.S. Army Technical Escort Unit (TEU) and the Edgewood Chemical Biological Center to evaluate the detection alarms. If the agent detections are deemed credible, the SOO will then initiate the siren via a remote control device that will be in his possession at all times during hours of intrusive excavation.

The emergency siren will run continuously for 3 minutes and then will be turned off for 15 minutes. At this point, the emergency siren will be activated for another 3 minutes to notify the NOSE residents that they should continue to SIP. This cycle of 3 minutes on and 15 minutes off will continue for the duration of the emergency.

3.1.2. *Initiation of the Ring-down System*

Following sounding of the siren, the ring-down system will be initiated. The SOO will either contact the ring-down vendor directly via phone or notify community outreach support personnel, depending on the situation.

3.2. Notification of Stakeholders

There will be four different stakeholder populations that will receive notification during a possible Lot 18 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 NOSE*

All stakeholders within 59 meters of the dig location at the time of an incident will need to take active steps to protect themselves from exposure to a possible RCWM release.

3.2.1.1. NOSE Residents

NOSE residents will hear the siren if they are home during an incident. The ring-down system will provide a second notification mechanism for those at home, as well as provide notice of a possible incident to NOSE owners and residents who are at work or elsewhere during the event.

USACE has already met with these owners/residents to discuss Lot 18 plans prior to the initiation of intrusive activities in 2004. USACE has notified the NOSE residents of plans to begin intrusive operations again on June 20, 2005 via letter, which was mailed May 3, 2005. Prior to June 20, USACE's Community Outreach Team will contact NOSE residents via phone to achieve the following objectives:

- A. Confirm ring-down phone numbers and e-mail addresses are still correct;
- B. Confirm each resident still has their SIP reference materials and ask them to re-familiarize themselves with the information; and
- C. Determine if any residential changes (i.e., new special subpopulation) have taken place within the home that could impact how SIP is achieved during an emergency.

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

3.2.1.2. American University (AU) Populations

During a series of PPP developmental meetings between USACE, AU and the Washington DC agencies in 2004, AU identified five different AU populations, including AU Public Safety personnel, staff, students, visitors, and building marshals. USACE will provide the necessary support to ensure that the siren and ring-down systems address AU needs and that AU populations have sufficient information and training to respond appropriately. In 2004, this support included Lot 18 background and SIP training sessions for AU populations that worked within the NOSE, planning with AU to utilize existing AU outreach mechanisms and establish additional methods to educate broader AU populations on the emergency notification systems, and coordination with AU response personnel to delineate appropriate roles and responsibilities during a possible RCWM release. Support necessary prior to initiation of intrusive activities on June 20, 2005 is being coordinated with AU, noting AU determines what type of outreach is necessary for its populations prior to re-initiating intrusive activities at Lot 18. USACE understands that certain AU outreach support will need to be customized for the specific population and time of year (e.g. students returning to the campus in the fall), so some outreach will need to take place after intrusive operations have begun.

3.2.1.3. Transient Stakeholders within the NOSE

A variety of transient stakeholders could potentially be within 59 meters of the dig site during intrusive activities. For instance, a student walking on campus or a jogger using Rockwood Parkway could find themselves within the NOSE distance and need to take protective measures when the siren sounds. For these individuals, their options will be to take shelter in the nearest structure or to quickly vacate the NOSE area. USACE will coordinate with AU to ensure that the appropriate safeguards are in place on campus, which will include a combination of signs, e-mail and phone notifications. During an emergency, AU's Public Safety personnel will establish a perimeter outside the NOSE distance to ensure that uninformed individuals do not enter the area.

As for non-AU stakeholders, project personnel will monitor activity on Rockwood Parkway and take the necessary steps to ensure stakeholder safety. For instance, the project personnel will inform more stationary transient populations (e.g., cable or phone person doing work on the block) of the Lot 18 work and how to respond to the siren. In an emergency, more spontaneous transient individuals (e.g., the periodic jogger or dog-walker) will be directed to leave or not enter the area. During a possible emergency, Rockwood Parkway access will be blocked at Nebraska Avenue to the east and Glenbrook Road to the west.

3.2.2. Stakeholders Outside the NOSE

USACE has determined that those residing, working or recreating at a distance greater than 59 meters from the dig site will be outside the NOSE and will not have to SIP. However, stakeholders outside the NOSE will need to avoid entering the area during an emergency. In turn, those who are outside the NOSE but within hearing distance of the siren will need to be educated on the existence of the siren, how to recognize the two different tones and that they should avoid the immediate vicinity of Lot 18 during an emergency. Fire, police or other emergency responders would instruct those outside the NOSE on what to do if a unique

situation arose where they would need to take specific protective steps in addition to just avoiding the area.

3.3. All Clear Notification

Those who have implemented SIP should remain under SIP conditions until they have been notified that it is safe to return to normal activity. This “All Clear” signal will not be given until project personnel have confirmed that no chemical agent remains in the vicinity at a level that could cause harm to an individual. This signal will be given through a separate, distinctive steady signal from the siren system. The “All Clear” siren will run for 3 minutes. Additionally, an e-mail and recorded “All Clear” message will be distributed to all stakeholders listed on the ring-down system.

3.4. False Alarms

MINICAMS are prone to false alarms, meaning that certain non-RCWM compounds could trigger a false-positive ring-off. USACE will make every reasonable effort to avoid false-positives; however, under certain circumstances, protection of nearby stakeholders may require SIP notification prior to false-positive determination. If the emergency notification mechanisms are implemented, and a false-positive is subsequently confirmed, the siren and ring-down system will be used to provide the “All Clear” notification.

4. Testing of Notification Systems

Both the siren and ring-down systems will need to be installed and tested before intrusive operations begin at Lot 18. Additionally, these systems will need to be tested periodically during ongoing operations to ensure they are still functional over time. This periodic testing also will act as a reminder to stakeholders that Lot 18 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. Siren System

4.1.1. *Pre-intrusive Testing*

Testing prior to intrusive investigation of Lot 18 will involve conducting a mock drill whereby Huntsville’s safety specialist will notify the SOO that the MINICAMS units have detected CWM both inside the ECS and at the mid-bed location within the CAFS. The SOO will initiate the siren system to determine if the unit is functional and make sure the hardware and remote activation switches are operational. **This testing will be conducted at Noon on May 31, 2005.**

4.1.1.1. Mechanical Aspects

The test will involve initiating the siren’s emergency tone using the SOO’s remote device from the Operations Center, which will be located at 4621 Rockwood Parkway. The siren will be run for approximately 1 minute, testing the “SIP” and “All Clear” tones for 30 seconds each.

When first tested in 2004, USACE picked several locations to measure decibel output from the tests. As the configuration of the siren system has not been changed since these tests, measurement of decibel output will not need to be conducted during the test on May 31.

4.1.1.2. Tabletop Exercise

On May 31, USACE, EPA, DC Health, AU, agencies supporting the Lot 18 intrusive investigation and emergency response entities participated in a tabletop exercise. The planned use of the siren system during a possible emergency will be incorporated into the tabletop exercises in order to familiarize all active parties with the system.

4.1.1.3. NOSE Stakeholder Coordination

AU and community stakeholders relying on the siren will be provided the opportunity to be at work or home, respectively, during the testing and to be included in the ring-down test. Due to the extensive outreach conducted in 2004 and considering that all NOSE residents are well aware of the Lot 18 process, participation in the siren and ring-down test will not be mandatory. The NOSE residents were invited to participate in the test via a letter sent in early May and outreach calls to confirm contact information will be completed prior to the

test date of May 31, 2005. As for AU populations, USACE is communicating with AU leadership to determine the amount of inclusion in the test desired for their populations.

For those stakeholders who want to participate, the siren and ring-down test will allow them to conduct a SIP drill. During this drill, individual stakeholders may choose to be in the room and setting where it is least likely they would hear the siren. Having such a drill will allow them to better understand the quality of the siren system and to identify any steps or concerns within their respective procedures that need to be improved. USACE representatives will be available to accompany NOSE residents during the test, if requested.

During the testing sequence, USACE will also record both the SIP and "All Clear" signals generated by the Lot 18 siren. This will allow audiotape distribution of the siren tones to those who request it, those who are not home during the test, etc. Recordings of the siren tones will also be placed on the Spring Valley project web site.

4.1.2. Periodic Testing

Periodic testing of the siren system will be necessary throughout the duration of the Lot 18 excavation. Monthly testing will be conducted on the first Friday of every month at noon. Conducting the test at noon will increase the likelihood that AU students will be aware of the test.

4.2. Ring-down System

4.2.1. Pre-intrusive Testing

Prior to initiating intrusive activities, the ring-down system will be tested via the internet. **This testing will be conducted at Noon on May 31, 2005, the same day and time as the siren system tests.** This test will address both the phone and e-mail delivery systems. Note that given some feedback from residents in 2004, the ring-down test will not be directed to all stakeholders. This test will include certain USACE, EPA and DC Health representatives, selected emergency response personnel and AU and NOSE residential stakeholders who specifically request to be included.

4.2.1.1. 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.

4.2.1.2. Tabletop Exercise

On May 31, USACE, EPA, DC Health, AU, agencies supporting the Lot 18 intrusive investigation and emergency response entities will participate in a tabletop exercise. In addition to notifying NOSE residents to initiate SIP, the ring-down system also will be used to notify a variety of participating agencies. In turn, testing and use of the ring-down system will be well-coordinated with every agency participating in the tabletop exercise.

4.2.1.3. NOSE Stakeholder Coordination

AU and residential stakeholders who choose to be included in the ring-down system will be provided the opportunity to be logged on to their e-mail and/or have their designated phones available during the test. Individual residents will be encouraged to contact USACE with any follow-up questions they may have.

4.2.2. 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.

4.3 Public Notification

Testing of the siren system will be heard by many residents and AU populations that reside, work or recreate outside the NOSE distance. USACE will include an announcement of the siren test in the next edition of the Corps'pendent, which will be mailed to all project area residents by May 20. AU

populations will be notified through AU's existing information dissemination and communication network. For residents who live within a few blocks of the NOSE, a postcard will be sent announcing the test so no resident is surprised by the siren.