



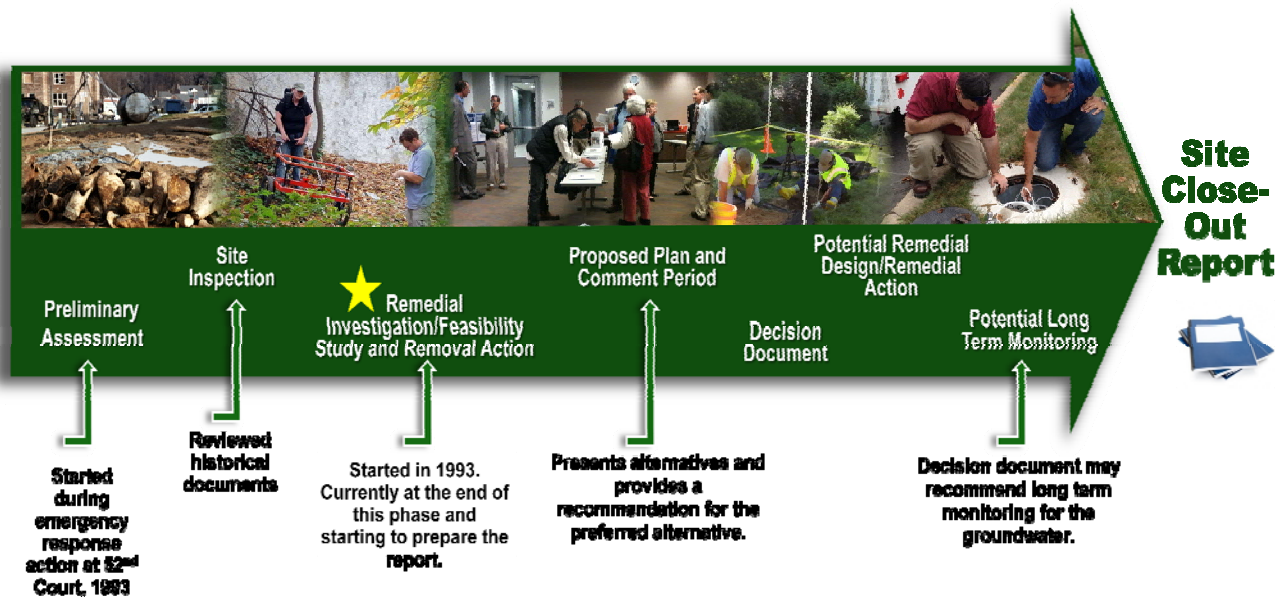
CERCLA Process for the Spring Valley FUDS

As we wrap up the **Remedial Investigation (RI)** phase for the site-wide Spring Valley project, we are looking back on the years of activity at Spring Valley as part of the documentation of our Comprehensive Environmental Response, Compensation, and Liability Act, or **CERCLA**, activities. The figure below illustrates the phases of the CERCLA process.

Spring Valley is a complex project involving a variety of avenues in which the cleanup activities occurred, including an emergency response, time critical and non-time critical removal actions, and ongoing site-wide **Remedial Investigation (RI)** work. The emergency response action at 52nd Court during Operation Safe Removal in 1993 kicked off the preliminary assessment, beginning the CERCLA processes.

After completing the preliminary assessment, the U.S. Army Corps of Engineers team conducted the site inspection, which consisted of reviewing the historical documentation about the activities at the American University Experiment Station and Camp Leach.

Following the site inspection, the team entered into the RI phase. The ongoing site-wide RI work has included soil sampling, geophysical investigations, groundwater investigations, background soil studies, indoor air and soil gas studies, arsenic speciation and bioavailability studies, and a perchlorate isotopic analysis. Also, during the RI work, when a potential threat to public health or welfare, or the environment was identified, the Spring Valley Partners (Army Corps, U.S. Environmental Protection Agency and District Department of the Environment) conducted various time critical and non-time critical removal actions to reduce the threat. *(Continues on next page)*



Now, the Spring Valley team is approaching the end of the active RI phase and anticipates completing the draft report in early 2014.

Key elements of the RI involves performing human health and ecological risk assessments to determine the severity of the risk posed by any remaining contaminants at the site, as well as completing a Munitions and Explosives of Concern (MEC) - Hazard Assessment to assess any remaining MEC hazards at the site. If these risks/hazards are found to be unacceptable by the Partners, then a **Feasibility Study (FS)** is conducted to assess additional cleanup options suitable for the site.¹

The FS document examines the environmental and economic implications of each alternative. An alternative is based on nine criteria: protection of human health and the environment; compliance with applicable or relevant and appropriate requirements; short term effectiveness; long term effectiveness; permanent solutions; implementability; whether community concerns are addressed; and the cost.¹

The preferred cleanup recommendation is described in detail in a Proposed Plan. The main recommendations fall under three main categories: no further action, remedial action, or long term monitoring. This document is then released for public comments. The final document, with public comments included, is used to write the Decision Document to decide which of the three courses of actions will occur.



Regulatory Background and Requirements

The U.S. Congress established a program to inspect and clean up hazardous waste sites across the country through **CERCLA** and the **Superfund Amendments and Reauthorization Act (SARA)**.

The Spring Valley **Formerly Used Defense Site (FUDS)** is not listed as a Superfund Site pursuant to CERCLA. However, environmental response investigations of the site are being conducted in accordance with CERCLA of 1980 as amended by SARA of 1986, the National Contingency Plan, and the **Defense Environmental Restoration Program (DERP)** management guidance. The DERP, established under CERCLA, provides the authority for certain cleanup activities at FUDS in the United States and its territories. It stresses the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites and required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations. SARA also increased the focus on human health problems posed by hazardous waste sites; encouraged greater citizen participation in making decisions on how sites should be cleaned up; and increased available funding for these purposes. The cleanup of FUDS under the DERP is referred to as the DERP-FUDS program. FUDS are properties that the Department of Defense once owned or used, but currently no longer controls.

Regulatory oversight of the environmental response investigations at the Spring Valley FUDS is being conducted by the U.S. EPA Region III and District Department of the Environment.

¹ Environmental Stewardship Concepts, LLC. "Superfund 101 Fact Sheet." December 5, 2013. http://www.estewards.com/environmental_assistance/.