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Baltimore District

The Corps'pondent

A newsletter by the U.S. Army Corps of Engineers for Spring Valley Project area residents

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www.nab.usace.army.mil/Home/SpringValley

The Corps' mission in Spring Valley is to identify, investigate and remove or remediate threats to human health, safety or the environment resulting from past Department of Defense activities in the area.

Crews continue high probability work at 4825 Glenbrook Road



The team removed retaining walls, basement foundation walls, and the walkways in the front yard area of the property.

The cool, crisp winter weather serves to the benefit of the three-person team working under the Engineering Control Structure at 4825 Glenbrook Road.

For the last four months, crews meticulously excavated the front yard area of the property, removing retaining walls, basement foundation walls, and the walkways.

As part of the excavation process, crews remove the soil and debris from the site. As long as there are no American University Experiment Station (AUES) debris present and no MINICAMS air monitoring detections, crews load the soils and debris into rolloff containers. This process involves carefully packaging the material to meet transportation requirements and to ensure there is no risk to the public. Before placing the soil in a rolloff container, crews line the container with a heavy duty plastic liner bag. Then, they place the soil/debris in

to the container on top of the liner bag. Next, crews secure the liner bag over the top of the soil (similar to wrapping a burrito). The final step involves securing a tarp to the top of the container. This is a very thorough process that takes about one hour per container. Crews have removed approximately 30 rolloffs full of soil and seven rolloffs of rubble from the front yard of the property.

During the third week of November, work started under the former front porch of the home. This is near the area in the front yard where we stopped work in March 2010, due to the discovery of arsenic trichloride. While working in this area, crews have recovered approximately 100 pounds of AUES related glassware, a small amount of AUES scrap metal debris, and three empty 75mm munitions debris items. After thorough assessments of the items, we determined they did not contain chemical agents and explosives.

During low probability operations in 2013, the site crew also discovered one 75mm munitions debris item and a small amount of AUES glassware.

Air Monitoring and Soil Sampling

To date, no chemical agents or breakdown products have been detected on the air monitors or in the soil samples.

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On Nov. 18, crews recovered an empty 75mm munitions debris item.

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Highly-trained technicians from the Army's Edgewood Chemical Biological Center (ECBC) are on site performing continuous air monitoring for several chemical agents and industrial compounds. The monitoring covers those chemicals tested at AUES in the World War I-era. ECBC monitors for mustard, lewisite, and their respective breakdown products; as well as certain industrial chemicals, including volatile organic compounds, semi-volatile organic compounds, explosives, metals, cyanide, fluoride, iodine, and perchlorate.

In the beginning of high probability operations the team was not encountering AUES related debris. So the initial soils and rubble removed from the site were placed into rolloff containers. The sampling process for the rolloff containers involves collecting a composite soil sample from the soils placed into the container. The sample is thoroughly analyzed for chemical agent. This testing is completed to allow the team to properly assess the soils and make a determination on final disposal. To date, all the rolloffs have tested non-detect for chemical agent and have all been deemed non-hazardous. These roll-off containers will be shipped to a local, non-hazardous waste landfill. Prior to shipment, the rolloff containers are stored at the Federal Property.

Once crews started encountering AUES related glassware and debris, they began placing those items into containers for further chemical analysis. Additionally, all soils associated with AUES debris are placed into drums for further chemical analysis. This segregation is required due to the increased possibility for chemical agent in the debris and/or soils. The

team also is collecting one representative composite soil sample for every three drums of excavated soil. Each sample is thoroughly analyzed. To date, all of the drummed soils associated with the AUES debris have tested non-detect for chemical agent and have all been deemed non-hazardous. Final disposal will be determined once we have an adequate amount of drums for a shipment. All of the drums are currently being stored at the Federal Property in the secure drum storage area.



Examples of broken AUES glassware found during high probability operations.

Moving the Engineering Control Structure

As crews wrap up work in the front yard, we are preparing to move the Engineering Control Structure (ECS) toward the backyard and Kreeger Music Roadway. This move is planned for early March. As we continue to progress through the first tent location, the date for the tent move will be re-assessed. Once the ECS is in place, excavation work will continue in the backyard and last approximately four months until the third and final ECS move. These moves are needed to safely conduct excavations in the areas where we are more likely to encounter American University Experiment Station-related items.

RAB 2014 Meeting Schedule

The Spring Valley Restoration Advisory Board meets the second Tuesday at 7 p.m., only during the odd months of the year. Meetings are open to the public and are held in the Undercroft room at St. David's Episcopal Church, 5150 Macomb Street NW, Washington, D.C.

January 14

March 11

May 13

July 8

September 9

***November 18**

*Due to the Veteran's Day holiday Nov. 11, the RAB will meet Nov. 18.

Environmental process ongoing for site-wide

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 process.

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

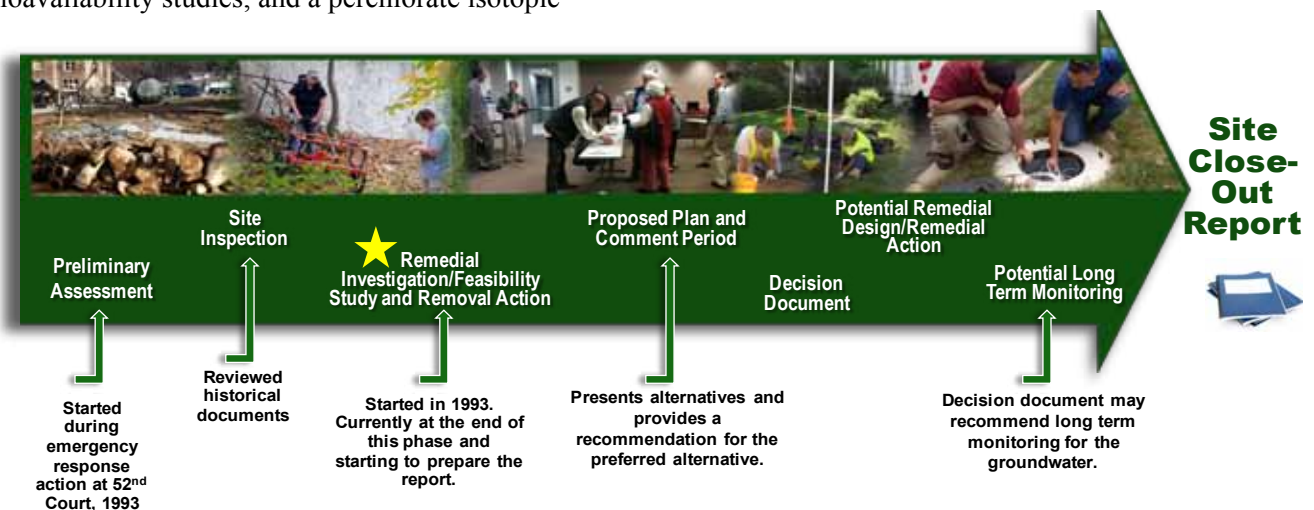
analysis. Also, during the RI work, when a potential threat to public health or welfare, or the environment was identified, the Spring Valley Partners (Army Corps, U.S. Environmental Protection Agency and District Department of the Environment) conducted various time critical and non-time critical removal actions to reduce the threat.

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;

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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. 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/.