

**Spring Valley Partnering Meeting
August 3, 2017
Spring Valley Project Federal Property Conference Room**

Name	Organization/Address	
Brenda Barber	USACE - Baltimore	
Todd Beckwith	USACE - Baltimore	
Janelle Boncal	Parsons	
Bethany Bridgham	American University	X
Sean Buckley	Parsons	X
Paul Chrostowski	CPF Associates, American University Consultant	
Tom Colozza	USACE - Baltimore	
Jennifer Conklin	DOEE	
Kathy Davies	EPA – Region III	
Laura Williams for Dr. Peter deFur	Environmental Stewardship Concepts/RAB TAPP Consultant	X
Diane Douglas	DOEE	
Bill Eaton	AECOM	
Chris Gardner	USACE – Corporate Communications Office	X
Steven Hirsh	EPA –Region III	X
Holly Hostetler	ERT	X
Dawn Iovan	EPA – Region III	
Carrie Johnston	ERT – Community Outreach Team	X
Carlos Lazo	USACE – Government Affairs Liaison	
Lowell (J.R.) Martin	USACE – Site Operations Officer	
Steve Norman	ECBC	
Dan Noble	USACE - Baltimore	X
Cliff Opdyke	USACE - Baltimore	
Randall Patrick	Parsons	X
Amy Rosenstein	ERT – Risk Assessor, Independent Consultant	

Tom Rosso	ECBC	
James Stuby	ERT – Geophysicist	
Jim Sweeney	DOEE	X
Tenkasi Viswanathan	USACE – Washington Aqueduct	
Cheryl Webster	USACE - Baltimore	
Nan Wells	ANC 3D Commissioner	
Kellie Williams	USACE - Huntsville	
Bruce Whisenant	USACE - Huntsville	X
Rebecca Yahiel	ERT – Community Outreach Team	X
Alex Zahl	USACE - Baltimore	X

Summary of 3 August 2017 Spring Valley Partnering Meeting

Consensus Decisions

- None

3 August 2017 Action Items

- Parsons will send an electronic copy of the 4825 Glenbrook Road presentation to AU.

Thursday 3 August 2017

A. 4825 Glenbrook Road Remedial Action

The goal of this segment of the meeting was to review the status of the remedial action at 4825 Glenbrook Road.

Parsons provided a brief update on the status of the Remedial Action at 4825 Glenbrook Road.

1. Recent Activities

There is a great deal of concrete in the excavation area. On June 20, demolition work began to remove the concrete pad for the air conditioning (AC) units, and the entire brick façade from the wall along the boundary between 4835 Glenbrook Road and 4825 Glenbrook Road was removed.

Soil was removed from behind the retaining wall so that the wall may then be cut and removed. Work focused on grids 10,-90 and 30,-90; the grid in front of the chimney and the grid to the right of the second window well.

Mechanical excavators were used to excavate previously backfilled areas and hand excavation was performed in areas where glass fragments were found or areas of suspected Chemical Agent Contaminated Media (CACM).

On July 26, site personnel broke down the concrete from the curved retaining wall because the curved retaining wall was in contact with the greatest amount of CACM. The concrete was broken down into chunks and put into 30-gallon drums for transport to the incinerator. Demolition of the straight portion of the retaining wall resumed with a concrete cutting chainsaw. Cuts were made along the bottom length of

the wall and then notches were cut all the way through the wall in order to break the wall apart with the large excavator.

During the month of July, work continued on the retaining wall and soil removal. The final portion of the AC unit pad was removed, and site personnel shored up all of the utility lines including the water, sprinkler, and AC lines that ran along the side of the house. The crew encountered CACM throughout the fill soil between the former retaining wall and the house foundation.

On July 6, the curved portion of the footer was removed. An indentation was discovered that was perhaps the result of the 1991 Apex investigation when soil was excavated and then lined with plastic sheeting. CACM was found in the corner underneath the indentation.

In response to a question from the ERT Community Outreach Team, American University (AU) and U. S. Army Corps of Engineers (USACE) Huntsville explained that the earlier removal action concerning a tree was in 1996. The plastic sheeting found on July 6 was likely from 1991, when Apex performed a removal action on behalf of AU to address a recovered glassware pit.

Fragments of glassware have been found in areas where marble to tennis ball size pieces of CACM have been encountered. No intact containers have been found.

The section of the retaining wall that steps up towards the backyard is not poured all the way down to the base of the retaining wall, which will make removing the retaining wall much easier.

A water line along the foundation was in the way of excavation, so site personnel excavated as much soil as needed to connect the water line without touching any of the soil. The hole was then lined. A plumbing contractor rerouted the water line so the line runs from the house down to the water meter.

Parsons ran out of 30-gallon poly drums, but had many 55-gallon drums. A model was created for the largest detected concentration of sulfur mustard (HD) and agent breakdown products (ABPs) in a 55-gallon drum of soil, assuming the combined concentration of HD and ABPs was all mustard. The increased mass of HD (1.87 grams) was still too small to produce an Acute Exposure Guideline Level (AEGL)-1 at a distance of 1 meter from the source. A minimum mass of 5.3 grams of HD is needed to produce an AEGL-1 at a distance of 1 meter, assuming all the worst-case parameters. Based on that analysis, Parsons began using the 55-gallon drums to transport potential CACM for incineration.

In response to a question from EPA Region III, Parsons explained that the 55-gallon drums are poly drums that can be fed directly into the incinerator.

In response to a question from USACE Baltimore, Parsons clarified that the AEGL-1 scale designates 3 as the worst and 1 as the most conservative level.

USACE Huntsville noted that there have been no ring-offs during excavations since the last meeting.

Parsons confirmed that there were no detections on the Miniature Chemical Agent Monitoring System (MINICAMS) of any sort.

USACE Baltimore added that the equipment was switched out because of concerns that the equipment was causing false positives.

Parsons agreed that the past detections were a combination of calibration issues responding to things in the environment.

Sporadic pieces of glass and marble sized pieces of CACM are consistently being encountered. Low levels of HD and HD breakdown products are also occasionally encountered in the soil samples. As of this meeting date, the last detected samples were from June 14. The highest reading samples collected in the general area were at 5.8 ug/Kg for HD and 63 ug/Kg for breakdown products. All American University Experiment Station (AUES) impacted soil will be assumed hazardous and therefore incinerated.

The current excavation extent has not changed since the last Partners meeting, but the depth has increased.

2. Summary of Area B Low Probability Removal

To date, 75 roll offs of soil, 6 roll offs of rubble, 16 drums of rubble, and 189 total drums of soil have been removed. Samples include 116 soil characterization samples, 5 grab samples, 3 Edgewood Chemical Biological Center (ECBC) grab samples, and 10 confirmation samples. The confirmation samples were taken from the front yard. The crew also removed 118.8 lbs. of scrap glass. In total, 630 cubic yards have been excavated out of the 668 cubic yards expected, or 94 percent complete based on the expected soil volume.

In response to a question from the ERT Community Outreach Team, Parsons explained that because the excavation is deeper than anticipated, the amount of expected excavated materials will be greater than 668 cubic yards at completion. Therefore the project may be less than 94 percent complete. There are 2 measures for determining percentage of completion. One is the comparison to the expected soil volume and the other is based on schedule. The schedule and durations are formulated, and then the percentage is calculated relative to schedule.

3. Future Activities

- Sample the concrete footer that was touching CACM soil. The concrete footer is very large and would take a month to rubbleize, so the footer will be sampled to establish characterization.
- Continue excavating along the base of the house to the bottom of the footer to determine what is underneath the footer. For the most part, the footer will be based on saprolite. A civil engineer visited the site and stated that as long as excavation does not pass below the depth of the base of the large footer there should be no problems. Parsons is taking steps to prevent water from pooling up against the footer so the soil underneath the footer would not be saturated.
- After the footer along the house is cleared, the area will be backfilled, the AC units will be placed in permanent positions, and then the front yard will be excavated. Areas that failed confirmation sampling for ABPs will be over-excavated, in addition to the corner of the house where CACM was found.
- Over-excavate the areas of elevated arsenic in the former high probability areas.

In response to a question from EPA Region III, AU explained that no one is living in 4835 Glenbrook Road at this time, and the new AU president will be moved in once the project is complete.

4. Schedule

The schedule has been revised.

- Low probability operations now expected to be completed by mid-April of 2018.
- Complete restoration of 4825 Glenbrook Road now expected to be completed by mid-summer of 2018.

In response to a question from EPA Region III, Parsons explained that the schedule changed to extend the durations. Typically the status of the schedule changes but not any of the planned durations. The planned durations have been changed because of the CACM finds. The footer pulled out easier than expected, but it is unknown what could be found in the front yard. The Project Delivery Team (PDT) agreed to the new schedule.

In response to a question from EPA Region III, Parsons and USACE Huntsville explained that the CACM seems to be only associated with 4835 Glenbrook Road. Not much was found on 4825 Glenbrook Road except under the 4825 Glenbrook Road back porch and on the front corner closest to 4801 Glenbrook Road. The contamination found at 4825 Glenbrook Road was more concentrated, whereas the contamination found at 4835 Glenbrook Road was more scattered throughout. The contamination at 4835 Glenbrook Road was broadly dispersed in the soil between the footer of the house and the retaining wall going uphill.

EPA Region III and USACE Huntsville commented that the CACM was not found in any of the test pits at 4835 Glenbrook Road.

USACE Huntsville commented that even now the monitors are not going off. There are definitely low level concentrations that have formed a crust that is relatively intact.

USACE Baltimore commented that during the test pitting, the investigators were sensitive to encountering stained soil at 4835 Glenbrook Road. If stained soil was encountered, a sample would be taken. Out of the ~76 test pits, only 5 or 6 samples were taken. No black substance was found during this test pitting. When the black substance was found this time, the discoloration of the soil made it clear that the substance might be contamination.

USACE Baltimore and USACE Huntsville agreed that the fill soil along the retaining wall at 4835 Glenbrook Road may have been brought over from 4825 Glenbrook Road. Testing will continue to determine if the fill soil around the foundation of the house is clean.

USACE Huntsville noted that the CACM was not expected, and the schedule and funding have been affected.

USACE Huntsville and Parsons noted that much of the contamination occurred behind the curved retaining wall, in areas where there were no test pits. In addition, no pit testing was conducted around water lines or other utilities.

In response to a request from AU, Parsons agreed to send an electronic copy of the presentation to AU.

USACE Baltimore noted that he did not remember taking many samples for agent at that site. Agent samples were only taken if something such as glassware or discolored soil was encountered.

USACE Huntsville added that a Livens projectile was found in the backyard and a sample was taken at that location.

USACE Baltimore added that there was also a metal bucket found up on the hill. There were four or five locations where agent was sampled during the test pit investigation. The five boring samples were sampled for agent.

Parsons replied that he would need to confirm that agent was tested in the boring samples.

USACE Baltimore noted that the samples would have gone through low level clearance. All samples tested for metals went to commercial laboratories.

In response to a question from USACE Baltimore, Parsons explained that he did not know if the samples were surface or subsurface. Parsons would research to find out if all of the samples were processed through low level clearance before the samples were sent to a commercial lab.

In response to a question from USACE Baltimore, Parsons explained that when the testing focus was on arsenic in 2007-2008, low level clearance was not always conducted. The saprolitic soil from behind the retaining wall was brought in as fill from somewhere in the local area. The black CACM pieces can look like bits of saprolite as well.

Department of Energy and Environment (DOEE) reminded Parsons on behalf of the DOEE Hazardous Waste Program to make sure that manifests are handled properly and each drum is labelled properly. A bi-annual report may be expected.

Parsons confirmed this.

In response to a question from AU, Parsons explained that the teams are utilizing four 10-hour work days, Monday through Thursday. When the heat breaks, possibly in mid-September, the crews will go back to five 10-hour work days.

B. Site-Wide Decision Document (DD)

The goal of this segment of the meeting was to review the status of the Site-Wide Decision Document.

USACE Baltimore provided a brief update on the Site-Wide DD.

USACE Baltimore sent the regulators a copy of the signed Site-Wide DD. The Army made edits to the principal threat waste (PTW) section before the document was signed. USACE Baltimore requested concurrence letters from the regulators.

EPA Region III commented that if the regulators did not have to give a concurrence letter he would have no issue with the Site-Wide DD. EPA lawyers would need to be consulted for a concurrence letter.

In response to a question from USACE Baltimore, EPA Region III explained that EPA Region III could concur on the remedy even if he could not give a concurrence letter. EPA Region III gave a similar concurrence for the Site-Wide Feasibility Study (FS).

USACE Baltimore noted that there was language in the document that stated that sometimes Munitions and Explosives of Concern (MEC) is PTW, but the Army took that language out.

USACE Baltimore explained to DOEE that the concurrence letter should go to the District Engineer, and USACE Baltimore would provide DOEE with the necessary address.

DOEE noted that he believed DOEE's attorney saw no issue with the language change.

C. Site-Wide Remedial Action (RA)**The goal of this segment of the meeting was to review the status of the Site-Wide Remedial Action.**

USACE Baltimore provided a brief update on the Site-Wide RA.

A contract was awarded on June 30 to carry out the Site-Wide RA. Weston Solutions Inc. was hired to do the work and perform all phases of the remedy, including preparation and initiation of the Land Use Controls Implementation Plan (LUCIP), going to each of the properties to clear any potential munition items, and soil removal at the Public Safety Building (PSB).

USACE Baltimore asked for a discussion concerning work plans for the PSB. When the concrete pad under the former PSB is removed, what may be underneath is unknown. If the soil is clean and free of munitions debris, a method to verify that will need to be determined. A strategy for the contractor to verify whether or not every cubic foot of the soil under the pad needs to be excavated to saprolite or a pre-determined depth. There is a possibility the builders cleaned the area out before the building was constructed.

In response to a question from EPA Region III, USACE Baltimore explained that glass shards and other debris was found at the PSB property all the way up to the back of the building and was found in the front yard as well.

It is likely that some glassware and munitions debris may be found under the former PSB, but in the case that only clean soil is found, the soil might be left in place. There will be some test pitting and trenching to verify, but if everything looks fine and clean and the test results support that, USACE Baltimore believed there might not be a need to excavate the soil and haul it away. However, the contractor is funded for that excavation, so the work plan may be to remove the soil whether the tests come back clean or not.

In response to questions from EPA Region III, USACE Baltimore explained that the contractors bid an excavation of the entire footprint of the former PSB to a depth of 8 feet. If the contractor does not excavate to that depth, the funds are not returned to USACE.

DOEE, AU, and EPA Region III agreed that excavating the entire footprint of the former PSB seemed to be the best option, in order to be certain the soil is clean.

EPA Region III noted that a sampling strategy could be created, but the site may have the same results as Lot 18.

USACE confirmed similar results to Lot 18 were a possibility.

EPA Region III, USACE Huntsville, and AU noted that lewisite, arsenic, mercury, and lead were found at Lot 18.

EPA Region III commented that the sampling at the former PSB should be rigorous, because sampling was conducted at 4835 Glenbrook Road and contaminated material was not found at that time.

USACE will conduct a site visit with AU on August 7 and the contractor will be there. USACE Baltimore sought guidance and instruction for the contractor as the contractor begins to prepare the plan.

In response to a question from EPA Region III, AU explained that currently there is no development plan for the site of the former PSB.

EPA Region III noted that if AU planned to build a building with a basement in that space, the soil would have to be removed anyway. AU will want to know if soil left in place is clean soil that does not require any special handling or disposal. If the soil is left in place there is some chance that in the future USACE will have to deal with that soil again if something was missed. If the soil is excavated and sent away, there would be a much lower probability that USACE would ever have to deal with the soil again.

In response to a question from EPA Region III, USACE Baltimore explained that the sampling would be conducted at an 8 foot depth. As soon as the foundation is removed, USACE will direct the contractor to run a Schonstadt device over the footprint of the building for any indication of metal debris.

In response to a question from the ERT Community Outreach Team, AU and USACE Baltimore explained that there may be steam lines that ran under the former PSB, but they will be detected by the magnetic detection equipment.

Mobilization into the field at the PSB might be the first activity during the Remedial Action.

In response to a question from EPA Region III, AU and USACE Baltimore explained that the PSB has been demolished. A partial wall that was in contact with the soil still remains.

In response to a question from AU, USACE Baltimore explained that the mobilization date will be discussed at the meeting on August 7.

In response to a question from EPA Region III, USACE Baltimore explained that the former PSB site will be remediated under low probability protocols.

USACE Baltimore noted that a lot of intact items were found near the PSB. If intact containers are found, then they will be sent to ECBC for analysis.

USACE Huntsville noted that some munition items were x-rayed and found empty.

USACE Baltimore and USACE Huntsville noted that a single MEC item, a burster, was found.

USACE Baltimore noted that Weston Solutions selected Black Tusk as their subcontractor. The contractors will be utilizing the Man Portable Vector (MPV) device. Black Tusk has received their certification, and Weston anticipates achieving their certification in August. The Site-Wide RA is expected to begin after the Thanksgiving/Christmas time frame. Both the PSB and the 92 remaining properties will be undergoing activities concurrently.

In response to a question from EPA Region III, USACE Baltimore explained that there will be different teams handling the PSB and 92 remaining properties, but all Remedial Actions will be conducted by the same contractor and project manager.

EPA Region III believes the 92 properties should be addressed first and as quickly as possible, since that was a commitment made by USACE.

USACE Baltimore explained that USACE will be actively seeking the right-of-entries (ROEs) for the first 18 properties in the fall. One element that will take time is the approval of the work plan and Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP) and Advanced Geophysical Classification for Munitions Response Quality Assurance Project Plan (AGC-QAPP).

In response to a question from EPA Region II, USACE Baltimore explained that there will not be a work plan for every property; the one AGC-QAPP that will cover the whole process. After the ROEs are obtained, each property will undergo a civil survey so the arborist does not appraise a plant on a neighbor's property. The process includes obtaining the ROE, conducting the civil and arborist survey, and then clearing activities before the MPV arrives on the property. A benefit of the MPV is that the equipment does not need as much clearing of the property in order to operate. USACE does not know how many of the homeowners will request transplanting, rather than allow the plant to be cut and replaced. An arborist will need to determine if a specific plant can be transplanted at that time of year. Generally, transplants need to occur during the growing season. USACE can honor transplant requests, but the transplant may have to wait until spring.

EPA Region III suggested sending a letter to the homeowners that explains the process, including the importance of the ROE, and the logistical difficulties of transplanting specific plants.

USACE Baltimore explained that USACE is considering offering a public meeting to the first 18 people to describe the process, answer any questions from the homeowners, and listen to homeowner's concerns.

USACE - Corporate Communications Office added that USACE also plans to send a mailer that can reach each homeowner. The ERT Community Outreach Team communicates directly with the homeowners and is available to each homeowner for questions.

EPA Region III reiterated that the homeowners will need to understand that if the ROE is not in place, no work may occur on the homeowner's property.

ERT Community Outreach Team explained that the Outreach Team plans to give the homeowners a deadline for signing the ROE. If a homeowner is not interested at that time, then USACE will move on to another property.

EPA Region III noted that there may be homeowners that feel the ROE is a legal agreement, and that USACE is not particularly flexible about allowing input by the homeowners.

ERT Community Outreach Team explained that USACE works with the homeowners as much as possible; however there are some sections of the ROE that cannot be changed.

D. Groundwater Feasibility Study

The goal of this segment of the meeting was to review the status of the Groundwater Feasibility Study.

USACE Baltimore provided a brief update on the status of the Groundwater Feasibility Study (FS).

USACE Baltimore wants to hold a meeting with the regulators, either in-person or a phone call. As soon as the regulators agree on a date and format, the meeting will be set up, possibly the week of August 25.

DOEE noted that he would need to review the information and wait to see if there would be any problems.

EPA Region III noted that either in-person or a phone call would be fine. He would need to talk with Kathy Davies, EPA - Region III. He believed K. Davies has until the week of August 25 to submit her comments. USACE Baltimore knows that EPA has a different opinion of whether there is a need to restore the groundwater or not. The response given to EPA was that the Comprehensive Environmental Response,

Compensation, and Liability Act (CERCLA) requires USACE to be protective of human health and the environment and that land use controls (LUCs) do that task. EPA does not agree with that. That is a fundamental difference of opinion. EPA will also still have questions about or perhaps not agree with the premise that perchlorate cannot be treated because of the arsenic. EPA does not necessarily agree that is the case. EPA Region III believed the arsenic in this case is a minor issue. The arsenic level hovers around the Maximum Contaminant Level (MCL), and is likely not a plume.

E. Open Issues and New Data

1. Sample results for the item found in front of president's office are still pending.
2. USACE to give a presentation on 4835 Glenbrook Road at the September RAB meeting.
3. Former Glenbrook Road workers were invited to the September RAB. The deadline for the workers to receive travel reimbursement is August 31.

F. Future Agenda Items

1. Groundwater FS.
2. 4825 Glenbrook Road.
3. 4835 Glenbrook Road/former workers.
4. Site-Wide DD.
5. Site-Wide Remedial Action
6. October Regulators Site Visit

G. Agenda Building

The next meeting was scheduled for Thursday, October 19, 2017.

H. Adjourn

The meeting was adjourned at 11:12.