

**Spring Valley Partnering Meeting
April 7, 2016
Spring Valley Project Federal Property Conference Room**

Name	Organization/Address	
Sherri Anderson-Hudgins	USACE - Huntsville	X
Thomas Bachovchin	ERT	X
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	
Dr. Peter deFur (represented by Laura Williams)	Environmental Stewardship Concepts/RAB TAPP Consultant	X
Diane Douglas	DOEE	
Bill Eaton	URS	
Chris Gardner	USACE – Corporate Communications Office	X
Alma Gates	RAB Member – Horace Mann Representative	
Steven Hirsh	EPA –Region III	X
Holly Hostetler	ERT	X
Dawn Iovan	EPA – Region III	
Carrie Johnston	ERT – Community Outreach Team	
Dan Noble	USACE - Baltimore	X
Cliff Opdyke	USACE - Baltimore	
Randall Patrick	Parsons	X
Amy Rosenstein	ERT – Risk Assessor, Independent Consultant	

Lattie Smart	ERT - Community Outreach Team	
Jim Sweeney	DOEE	X
Tenkasi Viswanathan	USACE – Washington Aqueduct	
Cheryl Webster	USACE - Baltimore	
Ethan Weikel	USACE - Baltimore	
Nan Wells	ANC 3D Commissioner	
Maya Werner	ERT	
Kellie Williams	USACE - Huntsville	
Bruce Whisenant	USACE - Huntsville	X
Rebecca Yahiel	ERT – Community Outreach Team	X
Alex Zahl	USACE - Baltimore	X

Summary of 7 April 2016 Spring Valley Partnering Meeting

Consensus Decisions

- None

7 April 2016 Action Items

- USACE will provide the formal report concerning the safety incident from Edgewood Chemical Biological Center (ECBC) to the Environmental Protection Agency (EPA)-Region III, the Department of Energy and Environment (DOEE), and American University (AU).
- Parsons will provide AU with a specific work plan schedule to inform residents at 4835 Glenbrook Road.
- Parsons will provide a clarification of the 4825 Glenbrook Road Remedial Action schedule.
- USACE will notify the public that Agency for Toxic Substances and Disease Registry (ATSDR) is presenting the ATSDR Health Consultation report for 4825 Glenbrook Road at the May Restoration Advisory Board (RAB) meeting.
- USACE will contact Greg Beumel, RAB Community Co-Chair, concerning a possible venue change for the May RAB meeting, and will move the venue if a large attendance is expected.
- USACE will clarify to stakeholders that the ATSDR Health Consultation report presented by the ATSDR only concerns 4825 Glenbrook Road.
- EPA-Region III will check the requirements of a 5-year review for a land use control site.
- USACE-Baltimore will send a copy of the PP and Institutional Analysis (IA) to USACE-Huntsville for review.
- EPA-Region III will add a new name to the Comfort Letter for 3720 Fordham Road: Dominique Lueckenhoff, Deputy Director, Water Protection Division, EPA-Region III. EPA will brief D. Lueckenhoff on the Comfort Letter, who will then sign the letter.

Thursday 7 April 2016**Check-in**

The Partners conducted their normal check-in procedure.

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.

1. Completed Site Set-Up Operations

On February 8, Parsons completed mobilization and set-up for the 3rd and final tent location. Site personnel underwent refresher training for high probability operations, including Level B sampling and emergency rescue procedures. A valid smoke test was achieved on February 19.

2. Recent Intrusive Investigation

On February 24, Parsons began high probability operations, starting with the soil located behind the last remaining basement wall. No debris was found. While waiting for the excavated soil to be cleared of contamination, Parsons began breaking up and removing the basement floor.

Once the soil cleared headspace and low level agent and Agent Breakdown Products (ABP) analysis, Parsons removed the remaining basement wall. No debris or American University Experiment Station (AUES) items were found.

One structure found was an “I” or “H” shaped footer, located below the garage floor. U. S. Army Corps of Engineers (USACE) Baltimore and Parsons discussed possible reasons for the footer, including extra support for heavy vehicles, or a previous structure on the property. Neither scenario seemed likely, and no other previous home existed on the property. The footer was removed and no debris or AUES related items were found.

In response to EPA-Region III’s question, Parsons explained that a few initial soil samples have been taken, with no contamination found. The plan is to remove all the footers and scrape down to the saprolite layer, leaving the saprolite intact for when the USACE-Baltimore geologist visits the site.

On March 22, demolition of the last remaining footer began. The footer was located under the front basement wall. Parsons assumed the only area not contaminated was the first 20 feet. Parsons assumed the rest of the area was contaminated, based on contact with previous finds in and around the former stairs down to the corner closest to 4801 Glenbrook Road.

In order to incinerate the contaminated concrete footer, the concrete had to be broken up into 6x6x6 inch pieces. Parsons used a template to ensure correct size of the pieces for incineration. There was no vapor barrier associated with the debris. When removing the footer no debris or AUES items were encountered.

3. Summary

As of March 31, 9 roll offs of soil, 8 roll offs of rubble and 1 drum of rubble had been removed. Since development of the slides used in this presentation, Parsons has filled 80 drums with rubble. There is a weight limitation for the drums, which results in the high number. There have been 9 disposal characterization samples and they all cleared headspace. Parsons has removed 72 out of the 303 cubic yards expected for this Engineering Control Structure (ECS) location. No debris, AUES related items, agent or ABP contamination, or hazardous soil encountered as of yet. USACE asked if the total expected cubic yards is based on an assumed depth of soil beneath the slab. Parsons confirmed this, and that the number of expected cubic yards may be conservative.

A safety incident occurred on March 22, 2016. An Edgewood Chemical Biological Center (ECBC) technician was exposed to an unknown amount of dilute Cyanogen Chloride (CK) that is used to calibrate

the Miniature Continuous Air Monitoring Systems (MINICAMs). The procedure for this calibration is to challenge the MINICAM systems by inserting a syringe needle into a Teflon septum and withdrawing a known quantity of CK. The septum failed and a certain amount of CK released past the septum. When alerted, Parsons mobilized the medics and provided the medics with the Material Safety Data Sheet (MSDS) for that particular dilute agent. George Washington University Hospital was immediately contacted. The technician was transported to GW in the site ambulance with a police escort. The hospital was prepared for the technician. No lasting effects appear evident from the exposure. A formal report is pending. In the meantime, ECBC has increased the septum inspection and mandatory change-out from every 2 to 3 weeks to once a week.

USACE commented that this incident exposed a weakness in ECBC procedures nationwide. ECBC has informed all ECBC field teams that these revised procedures must be performed and documented as part of routine maintenance.

USACE will investigate the following points:

- The quantity of gas brought to a site for calibration use seems excessive. USACE will look into the possibility of smaller amounts.
- USACE has asked ECBC to model this release as part of the formal report.
- The possibility of using surrogate gases only, based on a lower toxicity compared to standard calibration gases used.
- USACE-Huntsville plans to visit the ECBC lab to investigate the gases used at the project site.

USACE will provide the formal report concerning the safety incident from ECBC to EPA-Region III, DOEE, and AU.

4. Future Activities

Parsons is transitioning operations from the footer removal and preparing concrete for incineration, to the final scrape of soil down to competent saprolite. Confirmation sampling will begin June 9.

Parsons confirmed the project is ahead of schedule. High probability operations are scheduled to finish June 2016.

5. Schedule

Complete High Probability Operations by early to mid-June. Actual investigation work expected to end in June. Still need to expose and excavate in corner closest to 4801 Glenbrook Road adjacent to area where contamination was found.

Complete Demobilization of High Probability Operations from July to September 2016. Decontamination of equipment ends without any contingency July 1, 2016. EPA-Region III asked if Parsons will be removing all equipment before the property is finished. Parsons explained that MINICAMs will remain on site, but will be in smaller sheds. The full laboratory sheds will no longer be needed.

Low Probability Operations will resume in October 2016. Parsons will provide AU with a specific work plan schedule to inform residents at 4835 Glenbrook Road.

Complete Low Probability Operations late March 2017.

Complete restoration of 4825 Glenbrook Road mid-summer of 2017 as previously scheduled.

6. Conclusion

Parsons will provide a clarification of the schedule in the Partners newsletter.

Revision 4 of the work plan is now available. The revision includes:

- Parsons taking on a new hazardous waste lab.
- Change of format of the Quality Assurance Project Plan (QAPP) to reflect current standards, and removal of the QAPP from excel tables.

B. Agency for Toxic Substances and Disease Registry (ATSDR)

The goal of this segment of the meeting was to provide an update on the ATSDR's Report.

The Health Consultation report for 4825 Glenbrook Road will be issued by ATSDR in mid-April.

ATSDR will host a 30 to 45 day public comment period on the document.

ATSDR will attend the May 10, 2016 Restoration Advisory Board (RAB) to present the ATSDR Health Consultation report's findings to the public. ATSDR will do their own public notification about the availability of the report and their presentation at the RAB meeting. USACE will also share this information with the project's stakeholder email list.

Based on USACE's prior review of an ATSDR draft report, USACE anticipates that the following conclusions regarding past exposure will be discussed in the report:

- The document will likely indicate that the site workers were exposed during construction of the 4825 Glenbrook Road home, and they may have an increased risk to develop specific cancers associated with exposures to mustard and lewisite, plus arsenical compounds.
- With respect to the individual 4825 Glenbrook Road homeowners, their children and the nanny, the report will likely indicate that they had a more limited exposure potential. Their potential exposure risks are associated with indoor vapor intrusion (in the basement and through ventilation – primarily due to poor construction techniques) and possibly to their children, if the children exhibited pica traits (children who eat soil) which USACE has no evidence of at this time.

Both ATSDR and USACE have developed separate communications plans to address any inquiries regarding the Health Consultation report. The communication plan developed by USACE includes the following:

- USACE intends to defer to ATSDR concerning the ATSDR Health Consultation report, referring any questions to ATSDR.
- USACE is prepared in the event the ATSDR Health Consultation report generates new interest to the Spring Valley Project.

The ATSDR Health Consultation report will be released on ATSDR's website. ATSDR will provide USACE with a hard copy of the ATSDR Health Consultation report, which will be stored at the USACE public library repository. A link to the ATSDR site will be provided on the front of the USACE-Baltimore webpage. The release of the ATSDR Health Consultation report will be highlighted in the USACE monthly summary concerning 4825 Glenbrook Road.

EPA-Region III asked how ATSDR will notify the public about the release of the ATSDR Health Consultation report. USACE explained that ATSDR plans to contact the media, and include in that notification ATSDR's intention to present the ATSDR Health Consultation report at the RAB meeting.

EPA-Region III asked where the May RAB meeting will be held. USACE confirmed that at this time the meeting will be held at St. David's Episcopal Church. USACE will contact the RAB Community Co-Chair, concerning a possible venue change, and will move the venue if a large attendance is indicated.

EPA-Region III noted that some members of the public may not realize that the report only concerns a single property. USACE will clarify to stakeholders that the ATSDR Health Consultation report only concerns 4825 Glenbrook Road.

In response to a question from USACE concerning EPA-Region III's response to questions from the public, EPA-Region III explained that the EPA-Region III Division Chief will be briefed, but there are no plans to release a statement. EPA-Region III typically defers questions from the public to ATSDR concerning ATSDR's reports.

USACE will host a site visit for ATSDR the afternoon before the RAB meeting.

USACE recommended that the Partners read the ATSDR Health Consultation report prior to the May 10 RAB meeting.

C. Pilot Project

The goal of this segment of the meeting was to provide an update on Pilot Project planning.

USACE-Baltimore District provided a brief update on the status of the Pilot Project.

1. Summary

During the Pilot Project, USACE plans to test two new technologies: the Time-domain Electromagnetic Multi-sensor Tower Array Detection System (TEMTADS) and the Man Portable Vector (MPV). These instruments seem well suited to the project, enabling better maneuverability around existing landscaping and residential buildings. The results will be compared to the data from traditional methods: the Electromagnetic (EM)-61 and the Geometrics (G)-858. If successful, the Pilot Project will allow implementation of the Advanced Classification (AC) process, reducing the amount of private property impact.

The Pilot Project will consist of 4 to 5 properties, chosen from a group of properties that have already undergone a geophysical survey. USACE will use the results of the Pilot Project to develop a Remedial Action plan for the remaining 95 or so properties requiring MEC/CWM remediation. Finding willing homeowners for the Pilot Project has proved more challenging than initially estimated. Some homeowners would rather wait to be a part of the main body of the remediation plan, rather than have more holes excavated on their property.

2. Contract Award

USACE is currently in the process of awarding a contract for the Pilot Project. The contract will include the following work plans:

- Project Management Plan (PMP)/Quality Assurance Surveillance Plan (QASP)
- Site Specific work plan with Partner Review
- Quality Assurance Project Plan (QAPP) with Partner Review
- Accident Prevention Plan (APP) – Site-specific Sampling and Analysis Plan (SSAP)
- Low Probability Contingency Plan

USACE considers the blind seed plan a critical component to the Pilot Project. As part of the Quality Control (QC) Plan, 5 to 6 non-hazardous munition items will be placed at each of the 5 properties.

The contractor working with USACE will:

- Obtain Right of Entries
- Inventory existing landscaping to determine what ornamental material will need to be removed
- Update the Base Maps
- Install Global Positioning System (GPS) control stations
- Use a new Instrument Verification Strip (IVS)

- Conduct blind seed tests
- Perform any site clearing necessary for bringing in the Environmental Security Technology Certification Program (ESTCP) equipment

ESTCP will perform a dynamic survey, and then determine the anomaly target list. USACE will then prepare a final excavation list for Partner review. If selection of the 5 properties continues to be problematic, a selective excavation list may be considered.

After excavation is complete, homeowners will be given the option of having USACE restore the landscaping or provide the funds for that restoration.

In response to DOEE's question of the need for an anomaly review board, USACE explained that the plan is to go through the excavation list with the Partners.

3. Schedule

USACE projects that a contract will be in place by the end of April. The draft Pilot Project report is scheduled to be available by the end of December. The Pilot Project should begin this summer to receive results by the end of the 2016 calendar year.

USACE has invited Dr. Herb Nelson, ESTCP to the next Partners meeting.

D. Groundwater Remedial Investigation (RI)

The purpose of this segment of the meeting was to review the status of the Groundwater RI report.

USACE briefly reviewed the status of the Groundwater RI report. The Response to Comments (RTCs) document has been reviewed. AU has approved the RTCs, and USACE is waiting to hear back from EPA-Region III, DOEE, and Environmental Stewardship Concepts. USACE has notified the contractor to proceed with the Draft Feasibility Study (FS) for Groundwater. The contractor is scheduled to submit the Draft FS for Groundwater to USACE by June 1, 2016. The document will be reviewed internally by USACE-Baltimore and the Environmental and Munitions Center of Expertise (EM/CX), and should be available to the Partners in late summer.

E. Proposed Plan (PP)

The purpose of this segment of the meeting was to provide an update on the Proposed Plan (PP).

USACE briefly reviewed the status of the PP. USACE internally resolved all of the comments to the PP and submitted the draft final PP to the Partners for review on April 1, 2016. The review period extends for 45 days, and USACE requests any comments by mid-May. A few changes were made to the PP, based on the USACE Center of Expertise (CX) review:

1. While the Hazardous and Toxic Waste (HTW) Remedial Action Objectives (RAOs) did not change, there is a change in the wording concerning the explosive hazard Remedial Action Objectives (RAOs) for the Military Munitions Response Program (MMRP).

There was discussion between USACE and CX about the need to specify a depth or clearance of excavation for the 100 homes set for remediation. USACE and CX agreed to include the wording 'to the depth of detection of the technology used' in the sentence concerning the depth of detection.

EPA-Region III commented that a specific depth of excavation will need to be included in the QAPP.

USACE explained the QAPP will specify maximum depth for the excavation of blind seeds.

USACE concurred with EPA-Region III's suggestion of pointing out this section to Dr. Herb Nelson, ESTCP for review.

2. USACE identified the Site-Wide Initiative as the munitions response at Spring Valley. The purpose of the initiative was to inform the public of the existence of the Formerly Used Defense Site (FUDS), and procedures in the event of encountering a potential Munition of Explosive Concern (MEC).

CX directed USACE to remove that section because in a Military Munitions Response Program (MMRP), a site-wide remedial action objective may only cover a Munitions Response Site (MRS) if the MRS follows the defined boundaries of the site.

At the project level, USACE plans to reach out to all residents or workers in the FUDS who might be doing construction activities or encounter a potential MEC item on their property. This includes the possibility of MEC found outside MRS 1.

The Educational Administrative Initiative will be applied on a site-wide basis for everyone in the FUDS going into the future, but the PP will contain a RAO only for MRS 1. The CX pointed out that this wording guarantees funding for this initiative.

EPA- Region III asked if all the hazardous munitions ever found in Spring Valley were inside the MRS.

USACE confirmed this, except the burial pit found on 52nd Court.

CX directed USACE to be specific in the PP to the tenth of an acre. The Areas of Focus for Active Response and Educational Awareness Initiatives are 40.4 acres, and the total size of MRS 1 is 120.1 acres.

In response to EPA-Region III's question, USACE confirmed that Nick Stolte is the CX reviewer for the PP.

EPA-Region III asked if the boundary of the MRS is 120.1 acres, why is the Educational area 40.4 acres? What happens to the remaining 79.7 acres?

USACE explained that the 40.4 acre area is both the Areas of Focus for Active Response and the Educational Awareness Initiatives Area. The remainder is only Educational Awareness Initiative area.

In order to avoid denial of funding for Awareness and Education Initiatives for Spring Valley in future, the wording of the PP ties the Educational Awareness Initiatives to a formally identified MRS in the system. USACE is tying all RAOs in the MMRP to MRS 1, so future funding is possible.

EPA-Region III asked if there are any other MRSs on the site.

USACE confirmed that there are two other MRSs: 4825 Glenbrook Road and the Civil War range fan.

ERT added that the three MRSs are outlined in the RI document.

In response to EPA-Region III's question, USACE confirmed that anything inside the FUDS line will be formerly written in the RAO as covered for the Educational Awareness Initiatives, because of the 120.1 acres of MRS 1.

If only a section of a property falls within the boundary of the MRS on the formal map for the PP, USACE will not include the entire property in any remedial activities.

In response to a question from Parsons, USACE confirmed that streets are excluded from the area of focus.

3. In the FS document, USACE used a lot of Unlimited Use and Unrestricted Exposure (UU/UE) terminology. Following CX recommendations, that terminology was completely dropped from the PP. CX pointed out that USACE's UU/UE wording could not be used if there was a land use control in place. The Education and Awareness Initiative is considered a land use control. Since USACE would not propose a plan without the Education and Awareness Initiative, CX recommended leaving the UU/UE terminology out. EPA-Region III concurred with this decision.

In response to EPA-Region III's question concerning the cost of this alternative, USACE answered \$18-19 million.

4. USACE dropped the 5 year review terminology concerning the Educational Awareness Initiative from the PP. CX explained that the 5 year review would be a separate Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) term.

EPA-Region III, USACE-Baltimore, and USACE-Huntsville discussed the requirements for a 5 year review. EPA-Region III noted that a 5 year review must be included somewhere in the PP document. USACE-Baltimore agreed, for the administrative purposes of CERCLA. For the Educational Awareness Initiative, the CX had pointed out that the review cycle may be a different frequency based on independent analysis.

EPA-Region III representative commented that if contamination is left on site above a risk based concentration for munitions, a 5 year review would be required.

USACE noted that no HTW contamination will be left unexcavated that would require a 5 year review. The issue of a review will relate to MMRP and what the appropriate review cycle is for a site where no munitions are found.

EPA-Region III commented that his understanding was that land use control sites require a 5 year review, and would check into those requirements.

In response to USACE's question, EPA-Region III confirmed that the Education Awareness Initiative does not have to be performed on a 5 year cycle. The purpose of a 5 year review is evaluate if anything was found at the site, if there was a change in land use, and if the latest controls have been effective.

ERT noted the possibility that the CX reviewer asked for the 5 year review reference to be deleted because that reference was written in as an implied part of the remedy. ERT suggested possibly changing the wording to recurring reviews.

In response to USACE-Huntsville's question, ERT noted that the PP is 23 pages of text.

F. Institutional Analysis (IA)

The purpose of this segment of the meeting was to review the IA document.

USACE expects to have the draft IA submitted for internal USACE review by the second week in April. To anticipate possible concerns about the content of the document, USACE is proposing in the draft phase to limit the group of institutions to those that are landholders within the MRS, where any expected future issues may occur. USACE believes the institutions involved that should speak and cooperate with each other include: USACE-Baltimore, EPA-Region III, DOEE, AU, and Washington Aqueduct. USACE does not expect any lingering issues on the properties of the original larger group of institutions including National Park Service, Wesley Theological Seminary, and Horace Mann Elementary; and thus proposes to remove them from the IA. Sibley Memorial Hospital and Wesley Theological Seminary have indicated they would rather not be a part of the IA.

The public review period for the PP is scheduled to begin in June. USACE recommended to AU to review the language of the Public Safety Building section of the PP.

USACE-Baltimore will send a copy of the PP and IA to USACE-Huntsville for review.

G. Open Issues

1. Comfort Letter

USACE received approvals from the Partners for the Arsenic Removal Action report for the property on the 3700 Block of Fordham Road, and will be sending out a Comfort Letter.

EPA-Region III will add a new name: Dominique Lueckenhoff, Deputy Director, Water Protection Division, EPA-Region III. EPA-Region III will brief D. Lueckenhoff on the Comfort Letter, who will then sign the letter.

In response to USACE's question, AU confirmed they would like to receive a Comfort Letter for 4825 Glenbrook Road.

USACE will provide an Assurance Letter to the homeowner of the property at 3700 Block of Fordham Road. USACE offered to make available the Anomaly Investigation Report to the Partners for review before sending the Assurance Letter.

In response to EPA-Region III's question, USACE explained that one piece of Munitions Debris (MD) was found at this Fordham Road property. The only difference with this report is that USACE did not bring the EM-61 or G-858 onto the property, so the data showing 90% reduction will not be available.

EPA-Region III asked if USACE will be taking those instruments back to the properties involved in the Pilot Project.

USACE responded that when the Pilot Project work plan is finalized, returning to the properties with the original instruments may be a component.

2. Archival Data Sharing

EPA-Region III is currently reviewing all files concerning the Spring Valley FUDS, and may come to USACE for electronic copies of files. USACE offered to share electronic indexes as well, and EPA-Region III accepted.

H. Future Agenda Items

There were no future agenda items discussed.

I. Agenda Building

The next meeting was scheduled for Thursday June 16, 2016.

J. Adjourn

The meeting was adjourned at 12:04.