UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY – REGION III

STATEMENT OF BASIS

U.S. GENERAL SERVICES ADMINISTRATION
SOUTHEAST FEDERAL CENTER
PARCEL M AND BUILDING 160

EPA ID: DC8 470 090 004

JANUARY 2010

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I. INTRODUCTION

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the United States General Services Administration (GSA), Southeast Federal Center (SEFC), Parcel M and Building 160 site located within the SEFC at 1st and M Street, SE, Washington, D.C. 20507 (hereinafter referred to as Parcel M).

The SEFC is subject to the Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k. The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and waste constituents that have occurred at their property.

Information on the Corrective Action Program can be found by navigating http://www.epa.gov/reg3wcmd/correctiveaction.htm.

EPA has reviewed all available SEFC and Parcel M data and has determined that no additional characterization or remediation is necessary for the Facility to satisfy its federal RCRA Corrective Action obligations. Based on this review, EPA is proposing its final remedy of Corrective Action Complete without Controls for Parcel M in this SB, and is providing the opportunity for public comment and review on the proposed final remedy.

B. Proposed Decision

This SB explains EPA's proposed decision that corrective action is complete at Parcel M and no further action to remediate soil, groundwater, indoor air or building materials is necessary to protect human health and the environment given the current and proposed future land use. Groundwater beneath Parcel M is acceptable for use, however public water will be provided by the District of Columbia Water and Sewer Authority.

To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Parcel M property, EPA encourages the public to review the work plans and reports and other documents which are found in the Administrative Record. The Administrative Record is maintained at the Southeast Branch Library, located at 403 7th St., SE at D St., SE, Washington, D.C. 20003. A copy of the Administrative Record is also available at the EPA Region III offices located at 1650 Arch Street, Philadelphia, PA 19103.

C. Importance of Public Input

EPA is issuing this SB consistent with the public participation provisions of RCRA. EPA will make a final remedy decision the 30-day public comment period. EPA may modify the proposed remedy or select other alternatives based on new information and/or public comments. The public is encouraged to review and comment on the proposed decision presented in this document and/or any additional options not previously identified and/or studied. The public may

participate in the remedy selection process by reviewing the documents contained in the Administrative Record and submitting written comments to EPA during the public comment period. The procedures for public participation can be found in Section IX of this document. EPA will address all significant comments received during the public comment period. EPA will approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

II. FACILITY BACKGROUND

The Southeast Federal Center (SEFC) is a 42-acre property in Southeast Washington, D.C., owned by the U.S. Government and under the custody and control of the General Services Administration National Capital Region (GSA-NCR). The property location is shown in Figure 1. The SEFC was formerly part of the Washington Navy Yard.

Parcel M is a 1. 67 acre (approximate) parcel in the SEFC that is comprised primarily of paved surfaces and Building 160, the former Pattern/Joiner Shop. Building 160 was originally constructed in 1918 and is being renovated for residential use. The soil remediation work on Parcel M included excavation of soil under the Building 160 footprint to construct underground parking, excavation and grading of soil outside the building, and trenching for utilities and wall footers. An Interim Measures Work Plan for Parcel M (IM Work Plan) was submitted to EPA in May 2007 and approved by EPA in May 2008. The IM Work Plan described how contaminated soil on Parcel M would be remediated.

Investigations of building materials in Building 160 identified the presence of lead-based paint (LBP), paint containing polychlorinated biphenyls (PCBs), asbestos-containing materials (ACM) and other building materials containing PCBs. An Interim Measures Work Plan for Hazardous Materials Abatement for Building 160 (Abatement IM Work Plan) was submitted to EPA in March 2008 and approved by EPA in April 2008. The Abatement IM Work Plan described how hazardous materials would be removed from the building during renovation.

The latest investigations and clean up were conducted in accordance with the EPA approved Work Plans. Upon completion of the clean up, GSA reported the activities and results to EPA in the Interim Measures Completion Report for Parcel M and Building 160 (WSP, 11/10/09) (Completion Report). EPA approved this Report.

Parcel M is part of the 42-acre SEFC property that is being developed by Forest City Washington. GSA and Forest City Washington signed a Development Agreement to transfer parcels either by sale or ground lease over a period defined in the Development Agreement. Acting as an agent for GSA, a separate entity, FC Remediation SEFC, Inc., conducted remediation required on the property. The remediation work is finished and the Completion Report documents this work. EPA approved the Report, and by approval confirms that the work meets the requirements of the Consent Order for this Parcel.

After public comment and EPA's Final Decision for final remedy for Parcel, the title or ground lease to the parcel will be transferred to a private entity for redevelopment purposes.

III. SUMMARY OF ENVIRONMENTAL HISTORY

A. SEFC Activities Completed Prior to EPA Order

GSA conducted a number of environmental investigations and contaminant remediations at the SEFC prior to the 3013 Consent Order (1999). These investigations and remedial activities are outlined below and are presented in the RCRA Facility Investigation (RFI) Report for the 44-acre SEFC (URS, dated June 16, 2004, with revisions).

Phase I Investigation (1989 and 1990): On behalf of GSA, Apex Environmental conducted a Phase I Environmental Site Assessment of the SEFC and DOT Parcel. The investigation consisted of a records review, personal interviews, site inspections, limited soil, water and sediment sampling, and laboratory analyses for one or more suites of chemicals including metals, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and pesticides. The Phase I results are reported in a document dated June 1990.

Preliminary Assessment (1991): On behalf of GSA, Apex Environmental conducted a Preliminary Assessment of the SEFC and the U.S. Department of Transportation (DOT) Parcel in 1991. The Preliminary Assessment score indicated to Apex that no further remedial action would be required at the SEFC under Superfund regulations.

Phase II Investigation (1991): On behalf of GSA, Kaselaan & D'Angelo Associates, Inc. (K&D) conducted a Phase II investigation of the entire SEFC and the DOT Parcel, in 1991. K&D collected samples of subsurface soils, groundwater, river sediment, building chip and wipe samples, and sediment and liquid from building sumps and pits. K&D collected a total of 209 biased and grid samples. Soil and groundwater samples were analyzed for one or more suites of chemicals including metals, VOCs, SVOCs, PCBs and pesticides. K&D installed eight groundwater monitoring wells and identified the presence of chemicals in groundwater south of the former Shell station at 212 M Street as an area of concern. The Phase II Subsurface Investigation Report is dated June 1991.

Supplemental Phase II Investigation (1996): On behalf of GSA, Woodward-Clyde Federal Services (WCFS) conducted a Phase II investigation of the SEFC and DOT Parcel that included 131 soil borings, 41 hydraulic push borings and 13 groundwater monitoring wells. Soil and groundwater samples were analyzed for one or more suites of chemicals including metals, VOCs, SVOCs, and PCBs. The investigation was designed to address soil and groundwater management during building and site infrastructure construction planned at the time. The Phase II Environmental Site Assessment Update Report is dated April 1996. Based on the data collected in the WCFS Phase II investigation and previous investigations, contaminated soil was removed from under the former switch gear room inside Building 160 and Area M2 (a small area near two other buildings that have been demolished), and two other areas in 1999. These soil removal IMs are described in the April 16, 2001 Description of Current Conditions/Interim Measures Site Stabilization (DCC/IMSS) Report and are summarized in Section VI of this Statement of Basis.

Building Materials Survey and Abatement (1997): On behalf of GSA, URS conducted a comprehensive environmental survey of Building 160 in 1997. The survey identified various hazardous building materials, including asbestos-containing materials (ACM), lead-based paint (LBP), PCB-containing light ballasts, mercury-containing light tubes, thermostats, switches, PCB-contaminated concrete and soil, and avian and bat excreta. These materials in Building 160 were then removed and disposed of (URS Group Inc., 2001b). ACM in the main roof and the courtyard roof were left intact to preserve the structural integrity of the building. ACM left in place included roofing tar and felt, roof shingles, siding tar and guard rail tar. The ACM in the roof, LBP and other hazardous materials remaining in Building 160 were removed in 2008 as described in Section VI.

Storm Drain Investigation and Cleaning (1998): A site-wide storm drain cleaning program was conducted in 1998 after sediment samples collected from the storm drain system at the SEFC were found to contain PCBs. Although PCBs were not detected in sediment samples collected from the storm drains on Parcel M, the storm drains on Parcel M were included in the cleaning program. Storm drains are located to the east and west of Building 160. Approximately 875 linear feet of storm drain main lines and laterals around Building 160 were cleaned, and then approximately 251 linear feet were inspected by closed-circuit television in 1998 (URS, 2001b). Based on the investigation and cleaning, PCB-contaminated sediment is not present in the storm drains on Parcel M. The storm drains on Parcel M were abandoned during redevelopment of the parcel and new storm drains were installed.

Interim Measures/Site Stabilization (1998-1999): The investigations on Parcel M identified several areas of contaminated soil; Area M2, underground storage tank (UST) #8, and PCB-contaminated concrete and soil in the switch gear room inside Building 160. Contaminated soil was removed from these areas in 1998 and 1999, as described in the DCC IM/SS Report (URS, 2001). Area M2 was centered on the location of a sample that contained 3,3'-Dichlorobenzidine concentrations greater than criteria. Soil within a radius of 15 ft was excavated to a depth of 0-4 feet below ground surface and shipped to an off-site disposal facility. In December 1999, UST #8 (a 1,000 gallon diesel fuel tank) was removed from the south end of Building 160 and PCB-contaminated concrete and soil were removed from the former switch gear room inside Building 160. Confirmation samples collected at the limits of these excavations contained parameter concentrations less than EPA residential risk-based concentrations (RBCs) or District of Columbia criteria for total petroleum hydrocarbons (TPH).

B. Parcel M

1. Activities Completed Prior to EPA Order

Sampling on Parcel M identified the following concerns: (a) PCB-contaminated soil under Building 160, and (b) surface soils containing concentrations of SVOCs greater than EPA, Region III residential risk-based concentrations (RBCs).

Aroclor 1260 (PCB) was detected above residential RBCs in multiple soil samples collected under the former switch gear room in Building 160. The PCB contaminated floor slab was removed and soil below the slab with PCB concentrations above 1 milligram per kilogram (mg/kg) was also removed. There were two remaining samples in the switch gear room with levels of Aroclor 1260 that still exceeded the residential RBCs: 0.36 mg/kg in the #1 soil – right

corner sample and 0.70 mg/kg in the left corner sample. Because PCBs were present in soil at concentrations greater than the residential RBC and because there have been previous releases inside Building 160 and in nearby areas, PCBs are chemicals of concern throughout Parcel M.

Three soil samples (SB72, SB124, and SB125) collected outside the building contained one or more PAH compounds at levels above the residential RBCs: benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and dibenzo(a,h)anthracene. The primary constituent of concern is benzo(a)pyrene, which has the lowest residential RBC (22 µg/kg) of the detected PAHs and the most detections. However, these PAHs are also present as a background contaminant in urban areas. The concentrations of PAHs detected in soil samples from Parcel M are typical of background concentrations in urban environments, including background soil samples collected north of the Washington Navy Yard (Appendix F).

Arsenic was detected in one soil sample from Parcel M at concentrations greater than residential RBCs (no other soil samples were analyzed for arsenic). Arsenic is a naturally occurring metal, and the concentrations detected in soil samples from Parcel M are similar to regional background concentrations. Because the arsenic concentrations represent background conditions, soil containing arsenic is not identified as an area of concern.

The groundwater investigations did not identify any areas of affected groundwater at the current 42-acre SEFC.

2. Activities Completed Under EPA Order

The purpose of RCRA Facility Investigations (RFIs) is to fully determine the nature and extent of any releases of hazardous waste and/or hazardous constituents at a RCRA Facility. Parcel M was investigated in more detail recently to prepare the Parcel for redevelopment. Areas of interest identified for Parcel M were fully delineated in previous studies and additional areas of interest were identified and delineated. Groundwater samples were collected from two existing wells on Parcel M. All groundwater results for MW-09 and MW-21 were below EPA's RBCs.

MW-21 was formerly included in the groundwater monitoring program for the U.S. Department of Transportation (DOT) Parcel, located north of Parcel M. MW-21 is located downgradient of the DOT Parcel and was included in the monitoring program to confirm that affected groundwater is not migrating from the DOT Parcel onto the rest of the SEFC. Groundwater samples were collected from MW-21 ten times between November 2003 and March 2007 and analyzed for VOCs by Method 8260B. VOCs were not detected in any of the groundwater samples collected from MW-21 between November 2003 and March 2007.

Soil samples from three of the borings installed around Building 160 in 1996 contained the following SVOCs exceeding the residential RBCs: benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene. WSP Environmental Strategies conducted additional investigation of the soil surrounding Building 160 in order to delineate the extent of the contaminants with concentrations exceeding the residential RBCs, and to provide sufficient data for a parcel-specific risk assessment. Other than arsenic, no contaminants were detected in the soil samples above residential RBCs.

C. Interim Measures

Interim Measures (IM) are actions taken to control or abate ongoing risks to human health and the environment in advance of the final remedy selection. This section describes the implementation of the Parcel M IM Work Plan and the Abatement IM Work Plan.

Building 160 was used as the Pattern/Joiner Shop and is being renovated for residential use. Previous sampling conducted on Parcel M and in Building 160 identified the following materials to be remediated or abated:

- soil containing PCBs
- lead-based paint (LBP)
- paint containing PCBs
- electrical system components containing PCBs
- heating, ventilation, and air conditioning (HVAC) system components containing PCBs
- ACM

The Interim Measures included excavation of contaminated soil which was shipped to off-site disposal facilities. Interior building materials that were identified as containing hazardous substances were removed during renovation and disposed of in accordance with the regulations.

Soil Removal: The renovation of Building 160 included construction of an underground parking area below the center of the building. Construction of the parking area removed soil containing PCB concentrations greater than the residential risk-based criteria (RBCs) from under the first floor switch gear room. The garage excavation area extended approximately 60 feet east to west and 220 feet from north to south, and included the entire foot print of the former switch gear room. The former switch gear room was remediated during previous work at SEFC. However, confirmation samples collected after the previous remediation work did not meet the current soil criteria in the IM Work Plan. Therefore the IM Work Plan proposed to remove soil under the former switch gear room that contained PCB concentrations greater than current residential criteria. Soil removed from this area was disposed of at the Soil-Safe facility in Brandywine, Maryland.

The IM Work Plan stated that the remaining areas of soil under the building were classified as Class 1 (uncontaminated). On May 8, 2008, WSP collected six soil samples from three borings to confirm the disposal classification of soil under the building slab south of the former switch gear room. This area was primarily occupied by the building's mechanical room. Samples were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), TPH-diesel range organics (DRO), TPH- gasoline-range organics (GRO), PCBs, and RCRA metals. VOCs, PCBs and TPH-GRO were not detected in the soil samples, and TPH-DRO was detected in one sample. The TPH-DRO concentration detected (45 mg/kg) was less than the District of Columbia criteria (100 mg/kg) but greater than the Maryland disposal criteria for petroleum-contaminated soil (10 mg/kg). Semivolatile organic compounds were detected in two samples at concentrations greater than Region 3 risk-based concentrations. Based on the presence of soil containing petroleum or SVOC concentrations greater than criteria in 2 of 3 borings, soil from under the building was classified as Class 3 soil (petroleum-contaminated).

Soil from under the former mechanical room was also disposed of at the Soil-Safe facility in Brandywine, Maryland.

On October 13, 2008, WSP collected a composite sample from the base of the excavation in accordance with the IM Work Plan. The sample was analyzed for PCBs, TPH-DRO, and TPH-GRO. PCBs were not detected in the soil sample, at a detection limit of 0.1 mg/kg. This confirmed that soil at the base of the excavation meets current residential risk-based concentrations. The sample did not contain detectable concentrations of TPH-GRO. The sample contained 34 milligrams per kilogram of TPH-DRO, which is less than the District of Columbia criteria for petroleum hydrocarbons (100 mg/kg). This confirmed that soil from the base of the excavation meets criteria, and no further excavation was required. During soil excavation, dust control and monitoring were conducted as described in Section 4.1.1 of the Soil Management Plan.

Paint Removal: Paint containing lead and PCBs was removed from Building 160 in accordance with the Hazardous Materials Abatement IM Work Plan. The paint abatement work began on April 4, 2008, and was completed on September 2, 2008. The property was unoccupied during the abatement activities. Abatement and sampling was conducted in accordance with the Abatement IM Work Plan. LBP and other interior coatings were removed by abrasive sand blasting by CATI Environmental and Construction, Inc (CATI). Prior to the proposed abatement work, CATI built a containment area around each abatement area. When abrasive blasting was completed within the LBP containment area, a visual inspection was performed. If the area was free of visible dust and deteriorated painted surfaces, single surface wipe samples were collected. If dust or deteriorated painted surfaces were present, the area was re-cleaned and additional paint removal was performed as necessary to remove any deteriorated paint.

Clearance sampling in all areas of the building was conducted in accordance with District of Columbia guidelines for LBP abatement under Lead-Based Paint Abatement and Control Act of 1996 and with the Abatement IM Work Plan. All dust wipe samples were collecting a minimum of one hour after final post-abatement cleanup activities.

If the residual lead level in any wipe sample equaled or exceeded the applicable clearance levels (40 micrograms per square foot for floors, 250 µg/sf for interior window sills, and 400 µg/sf for window troughs), the representative area of the sample was re-cleaned and retested. When all the wipe samples from a containment area were less than the clearance levels, the containment was removed.

CATI submitted a completion report for the abatement work to the District of Columbia on September 29, 2008. A Notice of Permit Completion was issued by the District of Colombia DOE on January 30, 2009. Clearance documentation was also included in the IM Completion Report (WSP, 2009).

Wipe and bulk samples were collected to confirm the removal of paint containing PCBs. In accordance with the Abatement IM Work Plan, two wipe samples were collected per floor (eight wipe samples total). Six wipe samples were collected on brick and concrete surfaces that had been coated with PCB-containing paint. Two wipe samples were collected on concrete window sills to evaluate the potential for PCBs to have migrated out of the PCB-containing caulk that

was present on the window sills inside the building. Each wipe sample was collected from a 100-square centimeter area in accordance with the EPA Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup (EPA-560/5-86-017). PCBs were not detected in any of the eight wipe samples, at a method detection limit of 0.1 microgram per 100 square centimeters (0.1 $\mu g/100\ cm^2$). Therefore, the PCB concentrations were below the risk-based criteria of 0.4 $\mu g/100\ cm^2$ developed by the EPA Region III Office of RCRA Programs.

Samples were also collected of porous materials that had been in contact with PCB-containing caulk or paint to evaluate whether PCBs had migrated into the porous materials. After abrasive blasting of painted surfaces was completed, two samples of brick or masonry materials from which PCB-containing paint or caulk had been removed were collected from each floor (eight samples total). Two of the eight samples were collected from concrete window sills that had been in contact with PCB-containing caulk. PCBs were not detected in the eight samples, at a reporting limit of 0.1 milligram per kilogram. Therefore, there is no evidence of PCBs remaining in building materials in Building 160 and no evidence of PCBs migrating into underlying porous materials.

Asbestos Removal: While the bulk of the ACM in Building 160 was removed in 1998, ACM in the main roof and the courtyard roof were left intact to preserve the structural integrity of the building. Removal and disposal of the ACM roofing materials was conducted in accordance with the Abatement IM Work Plan and in accordance with District of Columbia and federal regulations. Abatement work began on March 24, 2008. The known ACM in the roof was removed by April 23, 2008. Removal of the ACM exposed underlying layers of roofing materials that had not been sampled previously. Testing determined that the mastic, cement, tar, and felt located on the perimeter of the interior courtyard roof were also ACM. This ACM was also removed and disposed of in accordance with District of Columbia and federal regulations.

Suspected ACM was encountered in several areas during renovation work inside Building 160. Sampling and analysis confirmed the presence of the following additional ACM:

- 200 linear feet of thermal system insulation on former steam piping in the northern stairwell and in a crawl space
- 75 square feet of 9" by 9" green floor tile in the northern entrance of Building 160
- 300 linear feet of transite pipe (former storm drain) buried along the east side of Building 160

The additional ACM was removed and disposed of in accordance with District of Columbia and federal regulations.

Additional Building Materials: Sampling conducted before renovation identified the following building materials that contained PCBs or petroleum:

- electrical system components containing PCBs
- heating, ventilation and air conditioning (HVAC) system components containing PCBs
- wood flooring containing petroleum
- sand from abrasive blasting

These materials were also removed during building remediation in accordance with the Abatement IM Work Plan. A visual inspection was conducted to confirm that these hazardous materials had been removed. The sand generated by abrasive paint removal was also sampled and tested. Based on the analytical results, the spent media was characterized as a non-hazardous waste and disposed of in accordance with federal regulations.

Interim Measures Summary: The Interim Measures conducted by GSA addressed the contamination in soils at Parcel M. The IM Work Plan for Parcel M and Building 160 and the IM Work Plan for Hazardous Materials Abatement have been completed. The following materials have been remediated or abated:

- soil containing PCBs and petroleum hydrocarbons
- paint containing lead and PCBs
- ACM
- Building system components containing PCBs

Based on the monitoring conducting during the work, the Interim Measures met the following objectives from the IM Work Plan and the Abatement IM Work Plan:

- soil around the building and under the building meets standards protective for the location's intended residential use,
- soil under the building footprint is protective of construction and utility workers,
- material excavated and removed from the site during construction was managed and disposed of in accordance with District of Columbia and federal regulations,
- removed hazardous materials from Building 160 and managed and disposed of the waste materials in accordance with District of Columbia and federal regulations,
- demonstrated that the remaining structure meets clearance requirements under District of Columbia and federal regulations.

Therefore, EPA proposes no further action for soils. The groundwater beneath Parcel M does not need remediation, and therefore, EPA proposes no further action for groundwater.

If groundwater from the SEFC is used as a potable water supply, the estimated future potential health risks exceed EPA guidelines. However, the District of Columbia Water and Sewer Authority (DCWASA) supplies and will continue to supply potable water to Parcel M and the rest of the SEFC, which eliminates this potential source of risk. Groundwater use for the SEFC will be restricted by property deeds that will state that groundwater beneath the properties will not be used for any purpose other than environmental monitoring and testing.

IV. SUMMARY OF PARCEL M RISKS

Human Health Risk Assessment: Two human health risk assessments (HHRAs) were conducted to determine whether there are potential human health risks associated with future exposures to chemicals of potential concern (COPCs) in soil and groundwater on Parcel M. The first HHRA evaluated potential risk based on current conditions and exposures and was included in the RFI Report (URS, 2007). The RFI HHRA determined that the potential risks based on current exposures (e.g. commercial buildings and construction workers) at the SEFC are within EPA guidelines.

The second HHRA was included in the IM Work Plan for Parcel M and Building 160 (WSP, 2007). Because Building 160 is being renovated for residential use, the IM HHRA included an evaluation of potential risk to residents of the renovated building. The groundwater beneath Parcel M is acceptable for use, however public water supply is available on the SEFC and will be supplied to the renovated Building 160 and any future buildings on the property. Nevertheless, in accordance with the Risk Assessment Work Plan and EPA requirements, the HHRA evaluated potential risk assuming that the groundwater under the entire SEFC (not just Parcel M) is used as a potable water supply. The HHRA also estimated the risk assuming that groundwater is not used as a potable water supply.

If groundwater from the entire SEFC (not just Parcel M) is used as a potable water supply, the estimated future potential health risks exceed EPA guidelines. However, the provision of a public water supply will eliminate this potential source of risk. To further preclude possible future use of groundwater, a groundwater use restriction will be recorded with the property deed when ownership is transferred from GSA to Forest City Washington. The restrictive covenant will state that groundwater beneath the property shall not be used for any purpose other than environmental monitoring and testing. If groundwater from the SEFC is not used as a potable water supply, the HHRA concluded that the potential risks to future residents from soil and groundwater are within the guidelines considered acceptable by EPA. This institutional control is a voluntary by GSA and is not considered as part of the Final Remedy for Parcel M.

The completion of the IMs has reduced the potential risk by removing COPCs and hazardous building materials from Parcel M. Therefore, the conclusions of the HHRA are still valid. The potential risks to future residents from soil and groundwater are within the guidelines considered acceptable by EPA.

Ecological Assessment: A quantitative ecological risk assessment was not conducted for Parcel M. The SEFC has been almost completely covered by buildings and paved surfaces for at least 90 years. Industrial activities on the property and surrounding properties have precluded the establishment of suitable wildlife habitat. The parcel will mainly be covered by impervious surfaces, with the exception of some low-impact development storm water controls and landscaped areas. The surrounding SEFC will also primarily be impervious surface. The area surrounding the SEFC contains similar urban, developed properties.

An ecological habitat assessment conducted at the adjacent DOT Parcel confirmed the absence of habitat suitable for sustaining a viable foraging and breeding wildlife population. Based on Parcel M's similarity to the adjacent DOT Parcel, Parcel M does not provide habitat suitable for sustaining a viable foraging and breeding wildlife community, and does not present an unacceptable potential risk to wildlife that may use the urban habitat and the landscaped areas on the parcel. EPA approved the ecological habitat assessment on July 2, 2004.

V. EVALUATION OF EPA'S PROPOSED DECISION

This section provides a description of the criteria EPA uses to evaluate proposed remedies under the Corrective Action Program. The criteria are applied in two phases. In the first phase, EPA evaluates three criteria, known as Threshold Criteria. In the second phase, EPA may consider seven balancing criteria to select among alternative solutions, if more than one alternative is

proposed. GSA has demonstrated that the current conditions meet the threshold criteria established by EPA. Because EPA is not selecting among several alternatives, a complete evaluation of the balancing criteria is not necessary.

EPA is proposing no further corrective action for Parcel M. The following is a summary of EPA's evaluation of the Threshold Criteria:

1. **Protect Human Health and the Environment**: Parcel M has been remediated through the Interim Measures taken by GSA. The proposed remedy protects human health and the environment from exposure to contaminants. EPA's proposed decision meets this standard for current and future (residential) land use.

2. **Achieve Media Cleanup Objectives**: EPA's proposed remedy meets the appropriate cleanup objectives based on assumptions regarding current and the anticipated future (residential) land and water resource uses. Parcel M will utilize the public water supply and sanitary sewer systems operated and maintained by the DCWASA. No further investigations or corrective actions are necessary to protect human health and the environment given the current and reasonably anticipated land and water resource uses.

3. **Remediating the Source of Releases**: In all remedy decisions, EPA seeks to eliminate or reduce further releases of hazardous waste and hazardous constituents that may pose a threat to human health and the environment. GSA remediated Parcel M contamination by investigating, delineating and properly removing all media (soil and building materials) which exceeded EPA's Risk Based Concentrations for residential use.

VI. INSTITUTIONAL CONTROLS

Institutional Controls ("ICs") are generally non-engineered mechanisms such as administrative and/or legal controls that minimize the potential for human exposure to contamination and/or protect the integrity of a remedy. GSA is voluntarily inserting a groundwater use restriction which will be recorded with the property deed when ownership is transferred from GSA to the purchaser. The restrictive covenant will state that groundwater beneath the property shall not be used for any purpose other than environmental monitoring and testing. This IC is not considered a part of the proposed remedy for Parcel M.

VII. ENVIRONMENTAL INDICATORS

Under the Government Performance and Results Act (GPRA), EPA set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under control. The SEFC, including Parcel M, has met these indicators.

VIII. FINANCIAL ASSURANCE

Since no further investigation or clean-up for corrective action is anticipated, financial assurance is not required for Parcel M.

IX. PUBLIC PARTICIPATION

The public is invited to comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date the notice is published in a local newspaper. A public meeting will be held upon request.

The Administrative Record contains all of the information EPA considered for its proposed remedy for Parcel M. The Administrative Record is available for review at the US EPA, Region III office listed below and at the:

Southeast Branch Library
403 7th St., SE at D St., SE
Washington, DC 20003
Phone: (202) 698-3377
www.dclibrary.org/branches/soe
Hours: 9:30am – 5:30 pm, M,W,F, Sat.
1:00 – 9:00 pm, T, Thu.

Comments and requests for records or public meetings may be submitted to Ms. Barbara Smith at the EPA address below. Comments may be sent by mail, e-mail, fax or telephone.

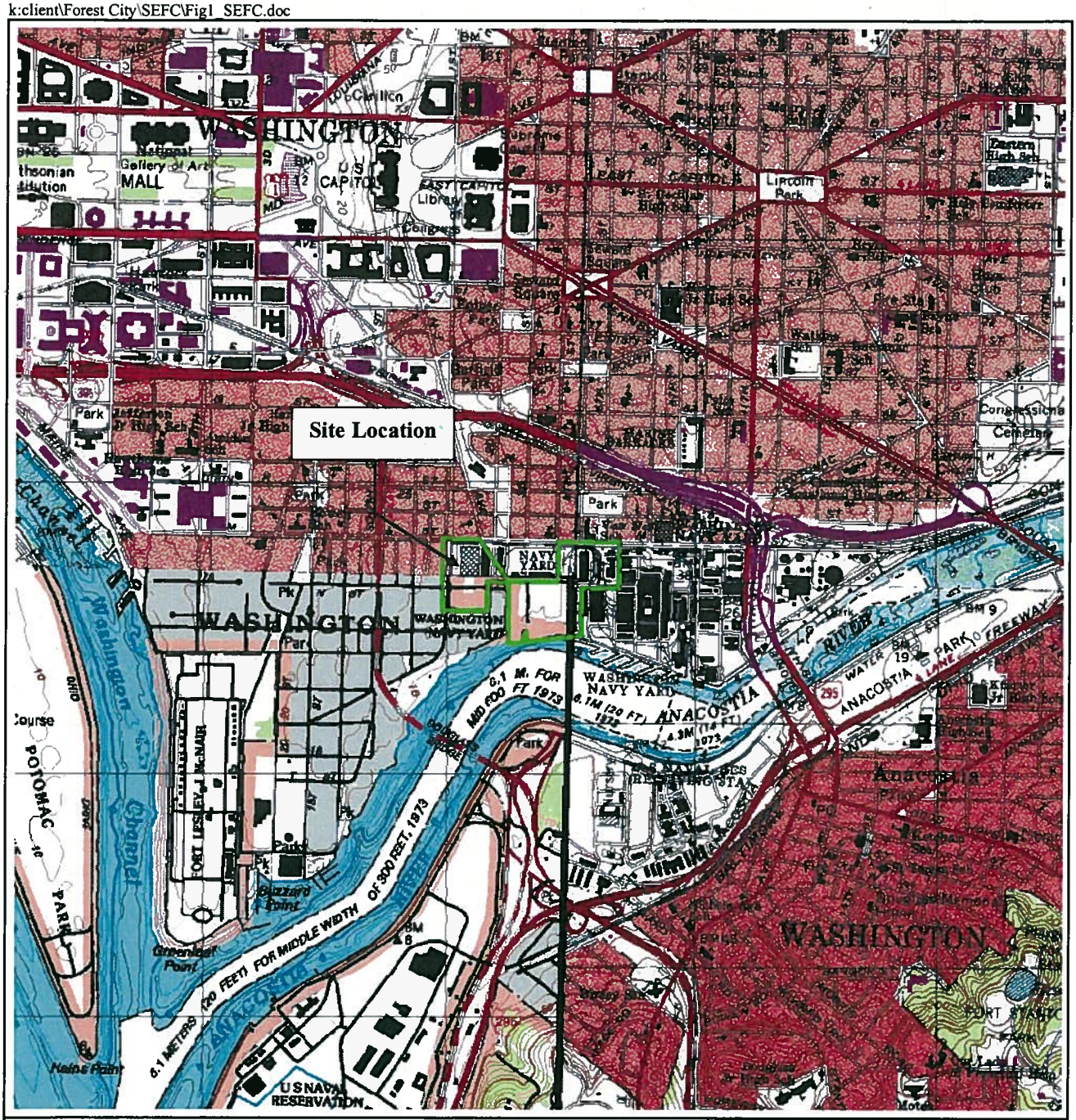
Ms. Barbara Smith
US EPA – III
1650 Arch Street (3LC20)
Philadelphia, PA 19103
Phone: (215) 814-5786
Fax: (215) 814-3113
E-mail: Smith.Barbara@epa.gov

After evaluating the public's comments, EPA will prepare a Final Decision Document, with Response to Comments if needed. The Final Decision will identify the selected remedy. These documents will be available to the public. If, on the basis of such comments or other relevant information, significant changes are proposed to EPA's proposed remedy, EPA may seek additional public comment.

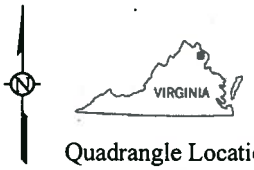
X. ATTACHMENTS

1. Figure 1 – Site Location Map
2. Figure 2 – Parcel M Site Map
3. Documents Used for Statement of Basis

k:client\Forest City\SEFC\Fig1_SEFC.doc



Reference
7.5 Minute Series Topographic Quadrangle
Washington West, DC
Photorevised 1983 Scale 1:24,000



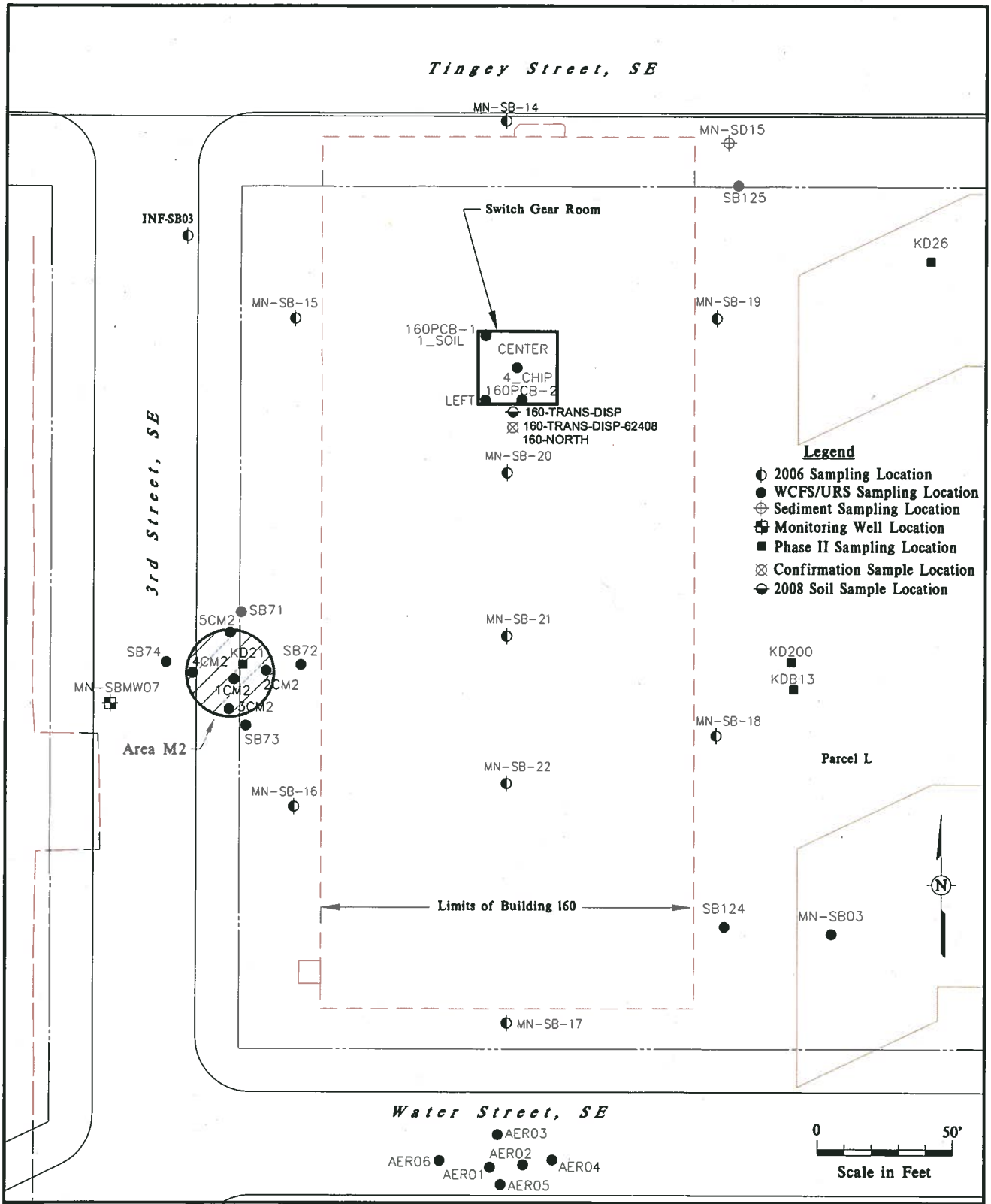
Quadrangle Location

1000 0 2000 4000

Scale in Feet

WSP
ENVIRONMENTAL STRATEGIES
11911 FREEDOM DRIVE, SUITE 900
RESTON, VIRGINIA 20190
703-709-6500

Figure 1
Site Location
Southeast Federal Center
Washington, DC



WSP Environment & Energy
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(703) 709-6500

Figure 2
Parcel M Site Map
Southeast Federal Center
Washington, DC

13125827.DWG

Attachment 3 - Documents Used for Statement of Basis

URS Greiner-Woodward-Clyde Federal Services, 1999. Design Drawings and Technical Specifications, Environmental Abatement Building 160, Southeast Federal Center, Washington DC. February 1999.

URS Corporation, 2001a. Final Abatement Closeout Report, Building 160, Southeast Federal Center. October 12, 2001.

URS Greiner-Woodward-Clyde, 2001b. Storm Water Drain System Cleaning Summary, Southeast Federal Center. December, 2001.

URS Group, 2001c. Description of Current Conditions/Interim Measures Site Stabilization (DCC/IMSS), Southeast Federal Center. April 16, 2001.

WSP Environmental Strategies LLC. 2006. Southeast Federal Center Soil Management Plan November, 2006.

WSP Environmental Strategies LLC. 2007. Parcel M and Building 160 Interim Measures Work Plan May, 2007.

WSP Environment & Energy LLC. 2008. Building 160 Interim Measures Work Plan for Hazardous Materials Abatement March, 2008.

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