

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

# STATEMENT OF BASIS

# US GSA-National Capital Region Southeast Federal Center, Remaining Parcels Washington, D.C.

EPA ID: DC8 470 090 004

Prepared by Office of Remediation Land and Chemicals Division

June 2015

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### **Section 1: Introduction**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the remaining portion of the Southeast Federal Center (SEFC or Facility). The SEFC is a United States General Services Administration (GSA) Facility in Washington, D.C. The SEFC or "Facility," was formerly part of the Washington Navy Yard, which is located along the SEFC's eastern boundary. The SEFC is located on M Street, SE, between 1<sup>st</sup> Street and Isaac Hull Avenue and on the southern boundary, the Anacostia River.

The SEFC was divided into fifteen Parcels. EPA previously selected remedies for six of the Parcels. This SB proposes a remedy for the remaining nine Parcels, which are collectively referred to herein as the "Remaining Parcels." The six remediated Parcels are now known as "The Yards." Attachment A shows the boundaries of the entire fifteen Parcels.

This SB highlights key information relied upon by EPA in proposing its remedy for the Remaining Parcels. The Remaining Parcels are: A, E, F, G, H, I, L, O, and Q. EPA's proposed remedy for the Remaining Parcels consists of soil and groundwater management. For soil, EPA is proposing that human exposure to any remaining contaminated soil be controlled and for groundwater, EPA is proposing that groundwater use for potable purposes be prohibited at the Remaining Parcels. The groundwater potable use prohibition will be maintained by way of an institutional control, such as a deed restriction or environmental covenant. This SB does not address the sediments offshore the SEFC property. At a later time, EPA will be soliciting comments on a proposed remedy for the sediments in a separate SB, which will also be subject to a 30-day public comment period.

The SEFC is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6901 <u>et seq</u>., (Corrective Action Program). 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/or hazardous constituents that have occurred at or from their property. Currently, the District of Columbia (District) is not authorized to implement a Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the District for the Corrective Action Program.

EPA is providing a 30-day public comment period for this SB. Based on comments received during this period, EPA may modify its proposed remedy. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments document after the public comment period has ended.

Information on the Corrective Action program is located at: http://www.epa.gov/reg3wcmd/correctiveaction.htm. EPA's Fact Sheet on the SEFC is located at: http://www.epa.gov/reg3wcmd/ca/dc/webpages/dc8470090004.html.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information that EPA relied on in proposing the final remedy. Attachment B is an AR Index for the Remaining Parcels. Public Participation information is provided in Section 8 of this SB for

those interested in reviewing the AR.

### Section 2: Facility Background

The SEFC is located on the banks of the Anacostia River, within one mile of the Capitol Building. The SEFC was formerly part of the 200+ year old Washington Navy Yard (WNY), which is located on SEFC's eastern border. In 1803, WNY was commissioned as a shipbuilding facility. Thereafter, before World War (WW) I, the WNY expanded as an ordnance manufacturing and research facility. Factories, shops, foundries and warehouses were built to manufacture naval guns, with the capability of building 127-ton guns. Munitions were not manufactured at the WNY, but some were found on-site and were probably used for testing guns. During WWII, the WNY expanded again to manufacture ordnance. After World War II, ordnance production decreased and in 1962, manufacturing operations ceased. WNY was restructured for use as office and storage space and in 1963, sixty-three (63) acres of previously industrial WNY property was transferred to GSA. GSA planned to redevelop the property for federal use. GSA removed asbestos, wastes in drums and other hazardous materials from the abandoned industrial buildings, prior to demolition. The GSA also began investigating the extent of contamination in soil, groundwater, and near shore sediment in the Anacostia River. GSA submitted a RCRA Facility Investigation (RFI) workplan to EPA in April 2001. In 2004, GSA submitted to EPA the RFI Report, which documents the Facility-wide findings.

GSA's rapid redevelopment of SEFC was enabled by the Public-Private Development Act of 2000, which allowed GSA to lease, sell or jointly develop the Facility with the private sector. Forest City Washington (FCW) is developing the Remaining Parcels for office, residential and commercial use, with a public waterfront park along the Anacostia River.

In 1998, GSA and the United States Navy (Navy) entered into a Consent Decree (CD) to settle an action filed against them by four private parties. Through the CD, GSA and the Navy agreed to begin investigating and cleaning up contamination at the SEFC and WNY. In a separate action, EPA and GSA entered into an Administrative Order on Consent under RCRA Section 3013 on July 14, 1999 to delineate contamination and take interim measures to abate contamination at the Facility. Currently, RCRA Corrective Action activities at the Facility are being conducted under a RCRA Section 7003 Administrative Order on Consent entered into by EPA and GSA, which became effective on September 30, 2014 (Consent Order). The September 30, 2014 Consent Order is intended to streamline the current investigation and clean-up process for the Remaining Parcels.

The SEFC consists of 15 Parcels. EPA issued a Final Decision and Response to Comments (FDRTC) for each of the following six (6) Parcels, on the following dates: U.S. DOT Parcel (July 14, 2005), Parcel M (February 24, 2010), Parcel P (August 26, 2010), Parcel K (December 20, 2011), Parcel D (June 28, 2012), and Parcel N (July 16, 2014). <sup>1</sup> These six Parcels were cleaned up under EPA-

<sup>&</sup>lt;sup>1</sup> Parcel N was included in the definition of "Remaining Facility" to be remediated in the 2014 Consent Order. However, a

oversight under the RCRA Corrective Action Program. In 2013, GSA submitted a *Corrective Measures Study for the Remaining Facility (*2013, WSP) to EPA evaluating different remedy options for the nine Remaining Parcels (Parcels A, E, F, G, H, I, L, O, and Q). In this SB, EPA is proposing one remedy as described in this SB for the Remaining Parcels, instead of issuing a separate SB and FDRTC for each of the Remaining Parcels.

#### **Contaminants and Risks**

Based on the *RFI*, 44-Acre Parcel SEFC, Washington, D.C. (2004. URS) Report, soil is the media most impacted by the Navy's intensive industrial use of the Facility property. Contaminants found in soil included petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals such as lead, arsenic and chromium.

Groundwater contamination at levels above Maximum Contaminant Levels (MCLs) promulgated at 40 C.F.R. Part 141 pursuant to Section 1412 of the Safe Drinking Water Act, 42 U.S.C. Section 300g-1, for drinking water, or EPA's Regional Screening Levels (RSLs) if a contaminant does not have a MCL, was identified on a few of the Parcels that have been conveyed and was not found beneath the Remaining Parcels as documented in the RFI Report (2004).

GSA conducted four near-shore sediment sampling events starting in 1990 and ending in 1999. Varying amounts of PCBs, PAHs and metals were found in sediment.

# Section 3: Summary of Environmental Investigations

GSA began environmental investigations at the Facility in 1989 and has continued investigations and clean-ups into the present. Before the 1998 Consent Decree, GSA voluntarily conducted investigations and clean-ups as its budget allowed. Between 1990 and 1999, environmental investigations were completed at the Facility. The details of these investigations are available in the *Descriptions of Current Conditions (DCC) and Summary of Interim Measures/Site Stabilization, Southeast Federal Center, Washington, DC*, Volumes 1-3 (April 16, 2001, URS) and the *RCRA Facility Investigation (RFI) 44-Acre Parcel SEFC, Washington, D.C.*, Volumes 1 – 7 (June 16, 2004, URS) Report. These documents are part of EPA's Administrative Record (AR) for the SEFC. Attachment B is a list of documents comprising the Administrative Record (AR) for this SB.

The 2004 RFI Report presented data collected from areas that had been previously investigated by GSA and had been identified as needing more delineation. The main objective of the RFI was to characterize contaminants and to determine the extent of contamination throughout the Facility. The data was then used to assess risks to human health and the environment posed by Facility contaminants. EPA approved the Final RFI Report in July 2008.

From 2004 to the present, Parcel specific soil and groundwater investigations and clean-ups were conducted under the Interim Measures (IMs) provisions in the 3013 RCRA Consent Order with EPA.

final remedy has been selected and implemented for Parcel N. Therefore, this Parcel is not subject to this SB.

The following six Parcels were developed by private developers after GSA characterized the Parcels and removed the contaminated soil: DOT Parcel, Parcel D, Parcel K, Parcel M, Parcel N, and Parcel P. Prior to the development of each Parcel, human health and environmental risks were evaluated for potential exposures posed by any remaining constituents in soil. The DOT Parcel is the only conveyed Parcel where groundwater is undergoing treatment. Final remedy decisions for the six Parcels are found at www.epa.gov/reg3wcmd/ca/dc/webpages/dc8470090004.html and are part of the Administrative Record (see Attachment B).

### **3.1 Soil Investigations**

The soil at SEFC is comprised of river deposits and fill, underlain by older, denser deposits of interbedded sands and clays of the Potomac Group. The upper soil consists of river deposits (gravel, sand, silt and clay) and fill that was placed into the canals, channels and embayments to fill the swamps/wetlands, creating the present land. Prior to 1800, much of the land now occupied by the SEFC was under water. The fill consists of inorganic sands, silts, clays, and construction/demolition debris.

Soil samples were collected from surficial/shallow soil (0-2 feet below ground surface (bgs)) and from deeper zones and were analyzed for the Appendix IX list of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPHs). The samples were submitted for laboratory analysis, along with quality control samples. After data validation, sample results were screened against EPA's 2002 Risk Based Concentrations (RBCs) for human exposure over time for residential and industrial scenarios, and also soil to groundwater screening levels (SSLs). If contaminants were greater than RBCs and/or SSLs, then the this data was evaluated in the risk assessment.

The primary soil contaminants found throughout the Facility were SVOCs. Twelve types of SVOCs were found at levels exceeding EPA's RBCs at the time (2002). The SVOCs are likely from past WNY activities, such as oil use and reclamation, and possibly from the fill material itself. TPH, measured in gasoline and diesel ranges, were found in three distinct areas and two PCB chemicals (Arochlor 1016 and 1260) were found at levels above the RBC screening levels in some Parcels. The PCBs are likely related to the use of transformers and transformer storage in some of the buildings during the Navy's use of the Facility.

Nine types of VOCs were found above residential or industrial RBCs but only five are attributed to Facility related releases: benzene, methyl-tert butyl ether (MTBE-a former gasoline additive), 1,1,2,2-tetrachloroethane, tetrachloroethylene and trichloroethylene. The first two VOCs are gasoline related chemicals and the last three are solvents, all associated with the Facility's previous industrial use. The four VOCs not attributed to the Facility are two common laboratory contaminants, one VOC that is related to leaching of monitoring well (MW) plastic compounds, and one VOC that is likely a disinfection chemical from a leaking public water line(s).

Finally, 15 metals were found at levels exceeding residential or industrial RBCs, with barium, cadmium, chromium, copper, lead, mercury and selenium exceedances more widespread across the Facility. Since metals/inorganics are naturally found in mineral soils, 'background' levels of metals in uncontaminated local soil was used to screen results. Arsenic and barium were found across the Facility at levels that were within background ranges.

#### 3.2. Groundwater (GW) Investigations

To characterize GW at the Facility, 61 GW monitoring wells (MWs) were used. Most of the MWs were installed in the shallow water table aquifer 20 to 40 deep below ground surface (bgs). Eight MWs were installed into the deeper Potomac aquifer with total depths of 80 feet or more bgs. There are clay layers of varying thickness acting as confining units between the shallow and the deeper Potomac aquifers.

GW data was screened using the lower of either U.S. Drinking Water maximum contaminants levels (MCL) or RBCs. In shallow GW there were seven metals detected above their respective screening levels: arsenic, barium, cadmium, chromium, mercury, selenium and thallium. With the exception of arsenic and barium, the majority of these exceedances were isolated, that is, they did not indicate a contaminated plume and reflect variations in the natural mineral content of the shallow GW, therefore are not Facility related contaminants. GW from the deeper aquifer zone only showed barium at levels above the screening level.

The organic contaminants, VOCs and SVOCs, were not found at levels above screening beneath the Remaining Parcels.

#### 3.3 Summary of Remedial Activities Completed

Pursuant to the 1998 CD, GSA was required to: (1) conduct comprehensive environmental assessments; (2) decontaminate and dismantle abandoned buildings; (3) clean out contaminated sediment from the storm drains; (4) collect sediment samples from near shore areas of the Anacostia River bed; and (5) replace the wood platform on the River with a concrete and steel seawall. GSA completed its obligations under the CD, and thereby laid the groundwork for further environmental investigations, clean up and development at the SEFC.

### 3.4 Human Health Risk Assessments and Ecological Risk Assessments

#### 3.4.1 Human Health Risk Assessments (HHRAs)

In 2006, to determine potential risks to workers at the SEFC from on-site contamination, GSA completed a qualitative HHRA. The qualitative HHRA concluded that there was no unacceptable risk to workers from exposure to contaminated soil. Although contamination was found in the groundwater, there was no unacceptable risk posed by drinking on-site GW because the Facility was supplied by municipal water supplies. Potential vapor intrusion (from volatile chemicals entering a work space from contaminated soil or GW below the building) was considered to be a negligible risk since GW and soil contamination from VOCs was generally limited to one area with limited use. This area was later remediated by removing contaminated soil during redevelopment.

As individual Parcels were investigated prior to development, subsequent HHRAs were Parcel specific and quantitative. The potential risks to future residents, workers, and utility and construction workers were evaluated using the scenario that some contamination would remain in place after redevelopment. For GW risk, one scenario calculated risks if on-Site GW was consumed (hypothetical) and the other scenario where GW was not used for drinking water (existing scenario). The HHRAs for post remedied or finished Parcels concluded that human health risks are within EPA's acceptable range,

provided that on-Site GW is not used for drinking water purposes. An evaluation will be conducted for each of the Remaining Parcels to evaluate whether that the conditions at the Parcel after Remedy Implementation pose an unacceptable risk.

In 2008, a HHRA was conducted for potential human exposure to contaminated sediments found off-shore and for potential risk of human exposure from eating contaminated fish. Exposure to contaminated sediments in the storm sewers was not calculated because sewer cleanouts removed the contaminated sediments. Human contact with River sediments is considered unlikely because the SEFC seawall prevents wading or boat launches. However, bioaccumulative contaminants have been found in fish taken from the River. A screening level assessment for potential human health effects from consuming contaminated Anacostia fish was conducted using conservative (worst case) assumptions for a hypothetical recreational fisherman. The hazardous quotients for consuming fish showed that PAHs, PCBs and some metals exceeded EPA's acceptable heath index considerably and indicate excess cancer risk and/or adverse health effects for the recreational fisherman scenario. Fish consumption advisories have been issued for this reach of the River and fishing from the SEFC property is prohibited. In July 2008, EPA approved the *Appendix Q: HHRA, 44-Acre Parcel RFI* (2008, URS) addition to the RFI Report.

#### 3.4.2 Ecological Risk Assessments (ERAs)

For more than 100 years, the SEFC consisted of densely packed buildings and paved surfaces from industrial uses. This development precluded the establishment of suitable wildlife habitats on the SEFC and surrounding properties. Previous qualitative studies documented that natural habitats are not present at the SEFC and therefore a quantitative Ecological Risk Assessment (ERA) was not necessary. In 2004, an ecologist inspected the DOT Parcel and confirmed the absence of habitat suitable for sustaining a viable foraging and breeding wildlife community on the DOT Parcel.

GSA submitted the *Appendix T: Ecological and Human Health Risk Analysis of River Sediment Data* (2008, URS) to EPA. Risks were calculated for aquatic life exposed to contaminated off-shore sediment. The analysis considered benthic invertebrates, herbivorous, semi-aquatic mammals (muskrat), birds that feed on aquatic life (heron) and fish that feed on benthic invertebrates (sunfish). The 1999 sediment samples collected near the SEFC shoreline were used for calculating ecological risks. The sample results showed elevated PCBs, PAHs, some VOCs, dioxins and metals levels. The results of the ecological assessment indicated adverse effects to the organisms studied.

Recent studies of the contaminant distribution in the Anacostia show the 1999 SEFC data is consistent with contaminant levels found in the area between the 11<sup>th</sup> Street and South Capitol Street Bridges (where two municipal combined sewers and SEFC/WNY are located). The 1999 PAH results were lower than the average PAH levels for the area between the Bridges. The 1999 PCB levels were similar to the Bridge area PCB levels, and most of the SEFC PCB locations are below PCB remedial goals. The metals results for the 1999 SEFC data were similar to the Bridge area levels which were found to be non-bioavailable.

The industrial related contaminants found in sediments off shore of the SEFC are found throughout this particular reach of the Anacostia River for a number of reasons. The WNY and SEFC are located at the 'bottom' of the Anacostia River watershed, near the confluence with the Potomac River, where the incoming tidal waters from the Potomac impact the downstream flow of fresh water, and thereby create a sediment depositional zone. Recent studies show that this area is a collection zone for upstream sediments, and does not necessarily reflect a single source of contamination, for example, from SEFC.

### 3.5 Environmental Indicators

Under the Government Performance and Results Act ("GPRA"), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental cleanup indicators for each facility: (1) Current Human Exposures Under Control; and (2) Migration of Contaminated Groundwater Under Control. The SEFC met both of these indicators for the total Facility in September 2003 and 2004, respectively. The environmental indicator forms are linked to EPA's Fact Sheet for this Facility (see Section 1 for the web address).

# Section 4: Corrective Action Objectives (CAOs) for the Remaining Parcels

EPA's Corrective Action Objectives (CAOs) for the environmental media at the following:

1. Soil

The Corrective Action Objective for soil is to attain EPA's acceptable cancer risk range of  $10^{-4}$  to  $10^{-6}$  for a residential exposure scenario and construction/utility worker exposure scenario.

### 2. Groundwater

EPA expects final remedies to return usable groundwater to its maximum beneficial use within a timeframe that is reasonable given the particular circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use the National Primary Drinking Water Standard Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141).

Barium and arsenic are the only contaminants in concentrations that exceed their applicable MCL in groundwater at the Remaining Parcels. However, EPA has determined that barium and arsenic are not Facility-related contaminants, but reflect variations in the natural mineral content of the shallow groundwater... EPA has determined that further remediation of barium and arsenic would not provide a significant reduction in risks to actual or potential receptors.

While there are currently no Facility-related contaminants that exceed applicable MCLs at the Remaining Parcels, because some contaminants remain in place at the Remaining Parcels, EPA's Corrective Action Objective for groundwater at the Remaining Parcels is to prevent contaminants from migrating into groundwater at concentrations that exceed applicable MCLs and to control exposure to the barium and arsenic in the groundwater.

# Section 5: EPA's Proposed Remedy for the Remaining Parcels

### 1. Soil:

EPA's proposed soil remedy is excavation and off-site disposal of contaminated soils.

### 2. Groundwater:

EPA's proposed groundwater remedy for the Remaining Parcels is the compliance with and maintenance of a groundwater use restriction prohibiting potable uses of on-site groundwater. EPA proposes that the groundwater use restriction be implemented through an enforceable institutional control such as a covenant or a deed restriction that runs with the Parcel.

# Section 6: Evaluation of EPA's Proposed Remedy for the Remaining Parcels

This section provides a description of the criteria EPA used to evaluate the proposed remedy for the Remaining Parcels consistent with EPA guidance. The evaluation is in two phases. For the first phase, EPA evaluates proposed remedies by using three 'threshold' decision criteria (see the table below). In the second phase, for remedies that meet the threshold criteria, EPA then evaluates the remaining proposed remedies using seven balancing criteria.

Threshold Criteria	Evaluation
1) Protect human health and the environment	The primary risks posed to human health and the environment from soil contaminants at the Remaining Parcels are related to direct contact to contaminated soil by future residents, workers, construction and utility workers. The proposed remedy is excavation and offsite disposal of soil that exceeds EPA's CAOs. Clean fill will be used to backfill any areas on the Remaining Parcels that will not be covered with new structures. This in combination with the restriction on the use of groundwater for potable controls the potential of human exposure contaminants. The GW use restriction will be recorded in the property deeds.
2) Achieve media cleanup objectives	The CAO for soil will be achieved by removing soil exceeding the CAO on each Parcel during excavation of the foundation/garage or basement for new structures. Contaminated groundwater was not found beneath the Remaining Parcels.

3) Remediating the Source of Releases	In all proposed remedies, EPA seeks to eliminate or reduce further releases of any remaining hazardous wastes and hazardous constituents from the Facility posing an unacceptable risk to human health and the environment. Contaminated soil can be considered a potential source of contamination to groundwater therefore, removing soil that exceeds the CAOs will remove a potential source of contamination to groundwater.
Balancing Criteria	Evaluation
4) Long-term effectiveness	EPA's proposed remedy will maintain protection of human health and the environment over time by removing contaminants through excavation and disposal of soils and by controlling exposure to any hazardous constituents that may remain in the groundwater. EPA's proposed remedy requires the compliance with and maintenance of a groundwater use restriction for the Parcel.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The reduction of toxicity, mobility and volume of hazardous constituents will continue by excavating contaminated soil and removing it from the SEFC.
6) Short-term effectiveness	Removing soil that exceeds EPA's CAO's from the Remaining Parcels provides immediate short-term effectiveness of the remedy. According to the Soil Management Plan (approved by EPA), construction workers will take appropriate protective measures for short term exposures to contaminated dust and soil. The construction zone will be monitored for any airborne releases, and dust control measures will be used to protect construction workers, site residents, workers, visitors and Facility passersby from any contaminated dust.
7) Implementability	Soil excavation is already a part of construction and redevelopment plans. EPA proposes to implement GW use restrictions through deed restrictions or Environmental Covenants.
8) Cost	The costs associated with the proposed remedy may vary with the amount of contaminated soil to be removed, however soil excavation is already a part of the construction/redevelopment costs. The costs to record an environmental covenant restricting groundwater use in the chain of title/deed of the Parcels is minimal.
9) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy by reviewing any submitted comments during the public comment period, and after a public meeting, if one is held. Responses to comments and any subsequent modifications to the proposed remedy will be written and included in the Final Decision and Response to Comments.
10) District/Agency Acceptance	The District Department of the Environment (DDOE) reviewed this SB and concurred with the proposed remedy for the SEFC Remaining Parcels.

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### **Section 7: Financial Assurance**

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. The SEFC is under GSA's responsibility and as a federal agency is not required to provide financial assurance.

### **Section 8: Public Participation**

Those interested are invited to comment on EPA's proposed remedy. The public comment period will last 30 calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Barbara Smith at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Barbara Smith at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed remedy at this Facility. The Administrative Record is available at the following location:

> U.S. EPA Region III 1650 Arch Street (3LC20) Philadelphia, PA 19103

Contact: Barbara Smith Phone: (215) 814-5786 Fax: (215) 814-3113 Email: Smith.Barbara@epa.gov

### **Section 9: Signature**

Date: 6.8.15

John A. Armstead, Director Land and Chemicals Division US EPA, Region III



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# Attachment B

# Administrative Record Index

1998, April; Consent Decree, Barry Farm Resident Council, Inc., et. al., Plaintiffs, v. U.S. Department of the Navy, et. al., Defendants.

1999, July; Administrative Order on Consent, under RCRA Section 3013, US GSA Respondent, EPA-3.

2001, April 16; Description of Current Conditions and Summary of Interim Measures/Site Stabilization Report, SEFC, Washington, D.C.; Vols. 1–3, URS.

2001, April 16; RCRA Facility Investigation Workplan: Data Collection Quality Assurance Plan, SEFC, Washington, D.C., and URS.

2001, February; Stormwater Drain System Cleaning Summary, SEFC, URS Greiner Woodword Clyde.

2004, June 16; *RCRA Facility Investigation, 44-Acre Parcel, SEFC, Washington, D.C.*, Vols. 1-7, URS Group, Inc.

2005, DOT Parcel Final Decision and Response to Comments, EPA-III

2006, October 26; *Human Health Risk Assessment* [future risk] *Work Plan, SEFC, Forest City Washington, Washington, D.C.*, WSP Environmental Strategies, LLC.

2006, November 9; Soil Management Plan, SEFC, Forest City Washington (FCW), Washington, D.C., WSP Environmental Strategies, LLC.

2007, Data Collection Quality Assurance Plan, Interim Measures, SEFC, Washington, DC, WSP Environmental Strategies, LLC.

2008, February 12; Appendix T: Ecological and Human Health Risk Analysis of River Sediment Data, SEFC, Washington, D.C., URS.

2008, March 12; Appendix Q: Human Health Risk Assessment, 44-Acre Parcel RCRA Facility Investigation, SEFC, Washington, D.C., URS.

2008, July 17; EPA-III Approval Letter of the 2004 *RCRA Facility Investigation* Report, including Appendix T and Q.

2010, Parcel M, Statement of Basis (SB), Final Decision and Response to Comments (FDRTC), EPA-III.

2010, Parcel P, SB, FDRTC, EPA-III.

2011, Parcel K, SB, FDRTC, EPA-III.

**GSA-NCR**, SEFC

2012, Parcel D, SB, FDRTC, EPA-III.

2013, Corrective Measures Study for Remaining Facility, SEFC, Washington, D.C., WSP.

2014, Parcel N, SB, FDRTC, EPA-III.

2014, Administrative Order on Consent, under RCRA Section 7003, US GSA Respondent, EPA-III.

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