UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

Naval Support Activity Bethesda
BETHESDA, MARYLAND

Prepared by
Office of Remediation
Land and Chemicals Division
February, 2017

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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 Naval Support Activity Bethesda (NSA Bethesda) facility located in Bethesda, Maryland northwest of Washington, D.C. in Montgomery County, Maryland (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from any of the units at the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required for the units included on the current RCRA Corrective Action Permit (Permit) for the Facility dated September 25, 2013. EPA has determined that its proposed remedy is protective of human health and the environment, that no further corrective action or land use controls are necessary at this time for all the units at the facility, completing the obligations for RCRA Corrective Action at the facility. This SB highlights key information relied upon by EPA in making its decisions for the proposed remedy.

The Facility is subject to EPA's 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. §§ 6901 et seq. (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 hazardous constituents that have occurred at their property. The State of Maryland (Maryland) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in Maryland for the Corrective Action Program.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 6, Public Participation, for information on how you may review the AR. The Index to the AR may be found in **Attachment #1**.

Concurrently with this SB, EPA is soliciting comments on termination of the Permit. Pursuant to 40 C.F.R. §124.7, EPA has prepared this SB to describe the background and basis for the Permit and the reasons supporting the termination of the Permit. EPA's proposed final remedy as described in this SB supports EPA's proposal to remove all units addressed in this SB from the Facility's Permit requirements.

EPA will make a final decision on the proposed remedy and termination of the Permit after considering all information submitted during the public comment period. If no comments are received during the public comment period, the proposed remedy will become final and the Permit termination documentation will be signed and will become effective upon signature. Otherwise, EPA will issue a Final Decision and Response to Comments (FDRTC) after considering all comments submitted with respect to this SB and permit termination.

Information on the Corrective Action Program as well as a fact sheet for the Facility can be found by navigating https://www.epa.gov/hwcorrectiveaction/hazardous-waste-cleanup-us-naval-support-activity-bethesda-md-formerly-national .

Section 2: Facility Background

The Facility consists of approximately 243 acres located in Bethesda, Maryland northwest of Washington, D.C. in Montgomery County, Maryland. The Facility is bounded by Wisconsin Avenue (State Route 355, also known as Rockville Pike) to the west; Jones Bridge Road to the south; Stone Ridge School and the Parkview Estates residential neighborhood to the north; Interstate 495 to the northeast; and a local park and Chevy Chase View residential area to the east. The National Institutes of Health (NIH) complex is located on the west side of Wisconsin Avenue, adjacent to and west of the NSA Bethesda property. A location map and a Facility layout are attached as **Figures 1 and 2**, respectively.

The Naval Medical Command, National Capital Region (NMCNCR) was commissioned on February 5, 1942. In 1973, the Naval Hospital and NMCNCR were consolidated into one command, the National Naval Medical Center (NNMC). On Oct 1, 2011, the name of the facility was changed to NSA Bethesda.

A new, state-of-the-art hospital replaced the older one and was dedicated on November 21, 1980. This facility consists of two buildings: a three-story outpatient structure, which adjoins a seven-story inpatient building with 500 replacement beds. The two buildings have a combined area of more than 880,000 square feet.

NSA Bethesda and its tenant activities employ more than 6,500 employees, about two-thirds of whom are military personnel, whose activities result in the generation and storage of general solid, medical, mixed, radioactive, and hazardous wastes.

Section 3: Summary of Environmental History

On December 30, 2000, EPA issued a RCRA Corrective Action Permit, EPA ID No. MD4170024687 (Initial Permit), under RCRA Section 3004(u), 42 U.S.C. Section 6924(u), to NNMC for the Facility. The Initial Permit, which on its terms expired on December 30, 2010, was administratively extended by the EPA on October 20, 2010 until completion of the RCRA Facility Investigation. The Initial Permit currently governs corrective action at the Facility. Numerous investigations and actions have been completed and various reports have been submitted to the EPA since the issuance of the Initial Permit.

Twenty-two Solid Waste Management Units (SWMUs) and nine Areas of Concern (AOCs) were identified in the Initial Permit. In 2001, this number was changed to 25 SWMUs and 10 AOCs based on units being combined as well as added to the investigation.

The 2003 FDRTC documents EPA's determination for No Further Action for 15 SWMUs and 5 AOCs. The remaining10 SWMUs and 5 AOCs are part of the current RCRA Corrective Action Permit that was issued on October 17, 2013. **Table 1** below describes the ten (10) SWMUs, five (5) AOCs, and Facility-wide Groundwater included in the current RCRA Corrective Action Permit and in this SB.

Complete details, including sampling data, can be found in the individual reports, which are listed in the Index section of this SB and located in the AR. Sampling included surface and subsurface soil, groundwater, sediment and surface water sampling, wipe sampling and concrete sampling at the Facility. Chemicals of concern (COCs) included Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), Pesticides and Polychlorinated Biphenyls (PCBs), Metals, Dioxins and Furans, and Radionuclides.

Table 1

Solid Waste Management Units/ Areas of Concern	Description	Current status
SWMU 1 – Building 256 Storage Facility	SWMU 1 is the current permitted hazardous waste temporary storage area.	The Navy submitted additional documentation associated with the history of SWMU 1, including the results of routine inspections performed by the Maryland Department of the Environment. There is no evidence of a release, therefore no further action is recommended.
SWMU 2 – Former Laboratory Waste Disposal Unit	SWMU 2 is a small area (~0.03 acres) located near the northern corner of NSA Bethesda adjacent to Perimeter Road where it was reported that laboratory wastes were disposed by pouring directly on the ground surface.	In 2015, the Navy performed additional subsurface soil sampling within an area of contaminated soil discovered during the installation of a water line. Samples collected during the investigation were analyzed for volatile organic compounds. No constituent concentrations exceeded the EPA regional screening levels, therefore no further action is recommended.
SWMU 3 – Asbestos Burial Area	SWMU 3 consists of a potential asbestos burial area behind Buildings 225, 241, and 242 and along the slope between the buildings and Stoney Creek.	Polycyclic aromatic hydrocarbons (PAHs) were detected at slightly elevated concentrations in several soil samples collected at SWMU 3 during the RFI activities. During a site visit in June 2016 attended by EPA and Navy personnel, the EPA representative inspected the SWMU 3 area. It was noted during the inspection that no potential asbestos containing material was visible on the ground surface and that SWMU 3 was located in close proximity to I-495. Based on the observations noted during the site visit and the results of the human health risk assessment presented in the SWMU 3 RFI report section that indicated there are no human health risks associated with exposure to soil, therefore no further action is recommended.
SWMU 17 – Military Gas Station Waste Oil Tank	SWMU 17 was a 2,000-gallon underground storage tank (UST) used to store waste oil from oil changes at the military gas station.	There is no evidence of a release, therefore no further action is recommended.
SWMU 20 – AFRRI Mixed Waste Underground Storage Tanks	SWMU 20 is the former location of six 5,000-gallon concrete USTs. All of the USTs were used for	The results of a radiation survey and analysis of radionuclides in surface and subsurface soil samples indicated that the radionuclide concentrations were comparable to those

	temporary storage of low-level radioactive liquid waste generated by AFRRI. Liquid waste was stored in the tanks until radioactive materials decayed sufficiently to meet Washington Suburban Sanitation Commission discharge standards, at which point the contents were discharged to the sanitary sewer. These USTs were removed in 1994.	detected at background locations, indicating that past site use for the storage of low-level radioactive wastewater has had no impact on soil at SWMU 20. Slightly elevated concentration of polycyclic aromatic hydrocarbons (PAHs) were detected in soil samples collected at SWMU 20. The Navy performed additional soil sampling at a downgradient location in July 2015. One PAH was detected at a concentration slightly greater than the EPA residential regional screening level, but the PAH concentrations detected in downgradient soil were less than those detected in soil samples collected during the RFI. Because there was no evidence that material containing PAHs was stored in the SWMU 20 USTs and the concentrations of PAHs in soil at the downgradient location were less than the PAH concentration detected in soil samples collected near the former USTs locations, therefore no further action is recommended.
SWMU 22 – USUHS Scintillation Fluid Disposal Unit	SWMU 22 originally consisted of two steel scintillation-fluid disposal units mounted to the wall in the basement of the Uniformed Services University of Health Sciences Building 70. These units were installed in 1988, but operations were soon after moved to Bay 9 of Building 74, where only one unit was installed. The scintillation fluid disposal unit is a steel floor-mounted unit that crushes vials containing liquids with radioactive isotopes. Waste liquids decanted from the unit are directed into 55-gallon steel drums placed beneath the unit on the concrete floor of Bay 9. Solid wastes are directed into wheeled, plastic trashcans. The facility is permitted through the Nuclear Regulatory Committee to store liquid and solid	Low concentrations of naturally occurring radioactivity (gross beta and several individual radioactive isotopes) were detected in the wipe samples collected at SWMU 22. However, the concentrations detected did not exceed the Nuclear Regulatory Committee acceptable surface contamination levels published in Table 3 of the Regulatory Guide 8.23 – Radiation Safety Surveys at Medical Institutions. Since there has been no documented release and the results of the wipe sampling indicate that the concentrations of radionuclides do not exceed the screening values, no further action is recommended.

		each excavation and submitted for analysis of PCBs. The Navy submitted a technical memorandum presenting the results of the excavation and sampling activities. Because no unacceptable human health risks were identified in the HHRA and the PCB concentration detected in the confirmation samples were much less than the concentrations identified in the initial RFI sampling, no further action is recommended.
SWMU 33 – Million Dollar Hill	SWMU 33 encompasses approximately 0.5 acre and it was reported that surplus war materials, including a jeep and cigarettes, were buried at SWMU 33 during World War II.	Elevated concentrations of polychlorinated biphenyls (PCBs) were detected in one soil sample collected at SWMU 33 during the RFI field event conducted in 2002. A HHRA was performed using the data from the RFI and the results of that risk assessment indicated that risks associated with the soils from SWMU 33 were within the EPA acceptable range. Furthermore, in 2012, the Navy performed excavation and off-site disposal in areas where elevated concentrations of PCBs were detected in soil. Confirmation samples were collected from the walls and floor of the excavation and submitted for analysis of PCBs. The Navy submitted a technical memorandum presenting the results of the excavation and sampling activities. Because the PCB concentrations detected in the confirmation samples were much less than the concentrations identified in the initial RFI sampling no further action is recommended.
SWMU 35 – Construction/Demolition Debris Disposal Area	SWMU 35 is approximately 0.5 acre in size and appears to have served as a construction and demolition debris disposal area.	Slightly elevated concentrations of chromium were detected in soil samples collected at SWMU 35 during the RFI field activities conducted in 2006. In July 2012, the Navy collected additional soil samples and surface water and sediment samples from a storm water retention pond that had been constructed at SWMU 35. All samples were analyzed for chromium and hexavalent chromium. The data were evaluated to determine if the concentrations constituents detected in soil, sediment, or surface water posed a risk to potential human or ecological receptors. No human health or ecological risks were identified therefore no further action is recommended.

	radiological waste with half-lives of less than 120 days.	
SWMU 23 – Storm Sewer System	SWMU 23 consists of the entire storm sewer system at NSA Bethesda.	During the RFI field event, portions of the storm sewer were inspected for sediment; however, no sediment was found in the sections of the storm sewer that were inspected. The NSA Bethesda storm sewer system discharges to Stoney Creek via several outfalls. Surface water and sediment samples were collected within Stoney Creek during the RFI field event. A human health risk assessment was performed using the surface water and sediment data and no unacceptable human health risks associated with exposure to surface water or sediment in Stoney Creek were identified. A Screening Level Ecological Risk Assessment was prepared to determine if the constituent concentrations detected in the surface water and sediment samples potentially presented an unacceptable risk to ecological receptors. Those constituents identified as presenting potential risks were further evaluated in the Baseline Ecological Risk Assessment to determine if they posed an unacceptable risk to ecological receptors. The results of the data evaluation performed during the ecological risk assessment did not indicate that constituent concentrations detected in surface water or sediment samples collected from Stoney Creek presented an unacceptable risk to ecological receptors. The EPA reviewed and commented on the ERA. The Navy addressed EPA comments and resubmitted the ERA recommending no further action.
SWMU 32 – Metal Storage Yard	SWMU 32 is an approximately 150-foot by 30-foot area southeast of Building 154 where old electrical parts, empty drums, old motors, pumps, pipes, beds, and other scrap metal were stored for more than 20 years.	Elevated concentrations of polychlorinated biphenyls (PCBs) were detected in soil samples collected at SWMU 32 during the RFI field event. A HHRA was performed using the data from the RFI and the results of that risk assessment indicated that risks associated with the soils from SWMU 32 were within the EPA acceptable range. Furthermore, in 2012, the Navy performed excavation and off-site disposal in areas where elevated concentrations of PCBs were detected in the soil. Confirmation samples were collected from the walls and floor at

AOC 2 – Building 42 and 53 Underground Storage Tanks	AOC 2 is comprised of two underground storage tanks (UST) that are used to store fuel oil. One UST located next to Building 42 and the second UST is located next to Building 53.	A HHRA was conducted for the AOC 2 (presented in the AOC 2 Section of the RFI Report) and concluded that there are no unacceptable risk to future residential or industrial receptors. The EPA and Navy discussed the conclusions of the AOC 2 HHRA and no further action is recommended for AOC 2. A human health risk assessment (HHA) was conducted for the AOC 2 (AOC 2 RFI Report) and concluded that there are no unacceptable risk The EPA and Navy discussed AOC 2 and the conclusions of the HHRA and no further action is recommended.
AOC 3 – Removed Underground Storage Tanks	AOC 3 consists of six USTs, which had been located in the area beneath the paved road surface and parking spaces behind Building 13 and in front of Building 155 in the central portion of NSA Bethesda. The tanks consisted of three 500-gallon waste oil tanks, two 2,000-gallon gasoline tanks, and one 1,000-gallon fuel/solvent tank. These tanks were reportedly abandoned in place in 1987 and were removed in October 1989.	Samples collected at AOC 3 during RFI were analyzed for VOCs, SVOCs, pesticides, PCBs, metals, TPH-DRO, TPH-GRO, and TPH-ORO. A human health risk assessment (HHRA) was conducted for the AOC 3 (presented in the AOC 3 Section of the RFI Report) and concluded that there are no unacceptable risk to future residential or industrial receptors from VOCs, SVOCs, pesticides, PCBs, or metals. Since no EPA screening levels exist for TPH, the concentrations of TPH-DRO and TPH-GRO detected in the AOC 3 samples were compared to the current residential, non-residential, and groundwater screening criteria presented in the Maryland Environmental Assessment Technology guidance document. The concentration of TPH-GRO in one duplicate soil sample was slightly greater than the residential screening criteria; however, the concentration of the parent sample was less than the screening criteria. The Navy submitted a technical memorandum documenting the results of the new evaluation to the EPA and no further action is recommended. The Navy re-evaluated the soil analytical results from the RFI field event conducted in 2006. The results were compared to the current residential, non-residential, and groundwater screening criteria presented in the Maryland Environmental Assessment Technology guidance document. The concentration of total petroleum hydrocarbons

		– gas range organics (TPH-GRO) in one duplicate soil sample was slightly greater than the residential screening criteria; however, the concentration of the parent sample was less than the screening criteria. The Navy submitted a technical memorandum documenting the results of the new evaluation to the EPA and no further action is recommended. Samples collected at AOC 5 during the RFI were analyzed for only TPH-DRO, TPH-GRO, and TPH-ORO. Since no EPA screening levels exist for TPH, a human health risk assessment was not performed. The TPH results were compared to the current residential, non-residential, and groundwater screening criteria presented in the Maryland Environmental Assessment Technology guidance document and there were no exceedances of the residential screening criteria in the soil samples collected during the RFI field event in 2006. The Navy submitted a technical memorandum documenting the results of the new evaluation to the EPA and no further action is recommended.
AOC 5 – Building 188 Underground Storage Tank	AOC 5 is the former location of a 1,000-gallon, steel underground storage tank (UST). This UST was installed in 1962 and stored No. 2 fuel oil for an emergency generator for the former Building 188, which was an underground bomb shelter.	The Navy re-evaluated the analytical results from the RFI field event conducted in 2006. The results were compared to the current residential, non-residential, and groundwater screening criteria presented in the Maryland Environmental Assessment Technology guidance document There were no exceedances of the residential screening criteria in the soil samples collected during the RFI field event in 2006. The Navy submitted a technical memorandum documenting the results of the new evaluation to the EPA and no further action is recommended.
AOC 6 – Power Plant Spill	It is an area where 1,500 to 2,000 gallons of fuel oil were spilled in 1985 during the transfer of fuel oil from a tank truck to an underground storage tank. A portion of the spill entered the storm sewer system and was discharged to Stoney Creek. Facility personnel deployed sorbent booms to clean-up the	The Navy searched through the environmental records at NSA Bethesda to locate a report documenting the spill clean-up activities. No documentation was found. The Navy also contacted the Maryland Department of the Environment (MDE) to request that they provide any documentation they had that was related to the spill. MDE could not locate any documentation associated with the spill or clean-up activities. The Navy provided the EPA with the results of their internal and

	discharge to Stoney Creek and a private contractor completed clean-up of the storm sewer system.	MDE records research. Because the spill clean-up activities were reported to have begun immediately and there was no evidence of impacts associated with the spill in the surface water or sediment samples collected from Stoney Creek during the RFI activities conducted in 2002 no further action is recommended.
AOC 11 – USUHS Hydraulic Fluid Spill	AOC 11 is defined as an elevator located inside of Building 73D. In the spring of 1990, a hydraulic fluid reservoir for the elevator ruptured at the bottom of the elevator shaft and released approximately 25 gallons of hydraulic fluid to the floor of the elevator shaft. Some of the hydraulic fluid eventually entered the storm sewer system and was discharged to Stoney Creek via a drainage channel. Facility personnel deployed sorbent booms in Stoney Creek.	The Navy searched through NSA Bethesda environmental record in an attempt to locate documentation associated with the release and clean-up. No documentation was found. During a site visit in 2014, the Navy inspected the floor of the elevator shaft and confirmed that a drain routed liquids from the floor of the elevator shaft to a pipe that discharged to the floor of a parking garage. There were no drains observed in the floor of the parking garage in the vicinity of the elevator shaft drainage pipe. The Navy prepared a technical memorandum documenting the additional research, findings of the inspection of the elevator shaft, and responses to EPA comments on the AOC 11 Draft-Final RFI Report and submitted the technical memorandum to the EPA. After review of the technical memorandum, no further action is recommended.
Facility-wide Groundwater	Groundwater beneath the NSA Bethesda facility	Groundwater samples were collected from the facility-wide groundwater monitoring well network (26 wells) during four quarterly sampling events conducted in 2002 and 2003. Only tetrachloroethene was detected at a concentration (5.7 ug/L) greater than the EPA Maximum Contaminant Level (5 ug/l) in one sample collected during the second quarterly sampling event . EPA conducted a statistical evaluation of the data and determined that the detected result was an outlier. Further a human health risk assessment performed using all of the groundwater analytical data identified only iron and manganese as chemicals of concern. However, risk- drivers, iron and manganese, are most likely attributable to the geologic formation. Furthermore, hydraulic conductivity testing performed during the RFI field activities indicated that the aquifer yield

was not sufficient to support potable use. Potable water at NSA Bethesda and the surrounding suburbs is provided by the Washington Suburban Sanitation Commission and the nearest potable water well is located approximately 2 miles from NSA Bethesda. In addition, there were no unacceptable risks identified for ecological receptors in the Baseline Ecological Risk Assessment, indicating that groundwater discharge has not adversely effected Stoney Creek. During a conference call between the Navy and EPA in October 2016, the above observations were discussed. The Navy prepared a technical memorandum documenting the discussion with EPA during the October 2016 conference call and submitted the technical memorandum to the EPA recommending no further action for facility-wide groundwater.

In summary, concentrations of hazardous constituents identified in the soil are within EPA's Regional Screening Level risk range for residential use, and concentrations of hazardous constituents identified in groundwater are all below EPA's Maximum Contaminant Level national primary drinking water standards. Therefore, there are no risks to human health or the environment for any use at this Facility.

Section 4: Proposed Remedy

After completing several rounds of investigations at the Facility's remaining SWMUs and AOCs identified as part of the RCRA Corrective Action Permit (Permit) dated September 25, 2013, EPA has reviewed all available Facility data and has determined that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on its review, EPA's proposed remedy is No Further Action, that no additional characterization or remediation is necessary.

EPA has found that the units described in Table 1 do not pose any unacceptable risk to human health or the environment and EPA proposes these units for No Further Action.

Section 5: Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The EPA has determined that the Facility met the current human exposures under control indicator on July 9, 2004. The EPA has determined that the Facility met the migration of contaminated groundwater under control indicator on August 23, 2004.

Section 6: Public Participation

Before EPA makes a final decision on the proposed remedy and to terminate the Permit for the Facility, the public may participate in the decision selection process by reviewing this SB and documents contained in the AR for the Facility. The AR contains all information considered by EPA in reaching this proposed remedy. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Luis Pizarro
Phone: (215) 814-3444
Fax: (215) 814-3113
Email: pizarro.luis@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed remedy and Permit Termination. The public comment period will last forty-five (45) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Mr. Luis Pizarro. EPA will hold a public meeting to discuss this proposed remedy upon request. Requests for a public meeting should be made to Mr. Luis Pizarro.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed remedy or Permit Termination, EPA will modify the proposed remedy or select other alternatives based on such new information and/or public comments, and revisit the Permit Termination decision. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed remedy will receive a copy of the FDRTC. Others may obtain a copy by contacting Mr. Luis Pizarro at the address listed above.

2-7-17
Date

Catherine Libertz, Acting Director
Land and Chemicals Division
US EPA, Region III

Attachment #1

Index to Administrative Record

November 2001	Final QAPP for the Priority I RCRA Facility Investigation
July 2002	Final Priority I RCRA Facility Investigation Project Plan • NNMC Executive Summary • Project Management Plan for Priority I • Description of Current Conditions Report • Sample Collection Methods and Procedures Plan • Data Management Plan • Health & Safety Plan
September 2003	Priority II RCRA Facility Investigation Project Plan
July 9, 2004	Human Health Environmental Indicator Form completed
August 23, 2004	Groundwater Environmental Indicator Form completed
June 2005	Priority III RFI Sampling and Analysis Plan
June 2008	RCRA Facility Investigation Report
October 20, 2010	EPA letter extending the RCRA Permit until completion of the RCRA Facility Investigation
August 17, 2011	Technical Memorandum Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report- Section 13 – SWMU 17 Military Gas Station Waste Oil Tank
May 23, 2012	EPA letter to NSA Bethesda for no further action determination at SWMU 17
March 15, 2013	Final Screening Level Ecological Risk Assessment
March 18, 2013	Technical Memorandum – Results of AOC 2 Site Visits
March 28, 2013	Technical Memorandum – Response to Comments for Solid Waste Management Unit 22 – Uniformed Services University of Health Sciences Scintillation Fluid Disposal Unit

April 11, 2013	Technical Memorandum – Results of Soil Excavation and Confirmation Sampling, SWMU 32 – Metal Storage Yard and SWMU 33 – Million Dollar Hill
August 8, 2013	Final Baseline Ecological Risk Assessment
September 25, 2013	Corrective Action Permit issued to NNMC by EPA (includes Attachments AA through CC)
October 17, 2013	EPA letter to NNMC transmitting Corrective Action Permit
March 4, 2014	Technical Memorandum – Results of SWMU 1 Research and Request for No Further Action
October 1, 2014	Technical Memorandum – Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report – Section 26 – AOC 11 USUHS Hydraulic Fluid Spill
November 7, 2014	EPA letter to NSA Bethesda for no further action determination at AOC 11
December 5, 2014	EPA letter to NSA Bethesda for no further action determination at SWMU 23
February 9, 2015	EPA letter to NSA Bethesda for no further action determination at AOC 2
February 9, 2015	EPA letter to NSA Bethesda for no further action determination at SWMU 1
February 9, 2015	EPA letter to NSA Bethesda for no further action determination at SWMU 22
January 25, 2016	EPA letter to NSA Bethesda for no further action determination at AOC 6
February 9, 2016	Technical Memorandum – Additional Investigation Results for SWMU 20 – AFFRI Mixed Waste Underground Storage Tanks
February 9, 2016	Technical Memorandum – Additional Investigation Results for SWMU 35 – Debris Disposal Area near Buildings 147 and 239
March 4, 2016	Technical Memorandum – Additional Research for AOC 3 – Removed Underground Storage Tanks
March 4, 2016	Technical Memorandum – Additional Research for AOC 5 – Building 188 Underground Storage Tank
April 4, 2016	EPA letter to NSA Bethesda for no further action determination at AOC 3
April 4, 2016	EPA letter to NSA Bethesda for no further action determination at AOC 5

April 29, 2016	Technical Memorandum – Results of SWMU 2 Direct-Push Soil Investigation and Sampling Activities
May 24, 2016	EPA letter to NSA Bethesda for no further action determination at SWMU 20
May 24, 2016	EPA letter to NSA Bethesda for no further action determination at SWMU 35
May 26, 2016	EPA letter to NSA Bethesda for no further action determination at SWMU 2
October 5, 2016	EPA letter to NSA Bethesda for no further action determination at SWMU 3
November 4, 2016	Technical Memorandum – Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report – Section 5 – Groundwater Contamination Assessment and Request for No Further Action
December 1, 2016	Technical Memorandum – SWMU 32 and SWMU 33 Additional Data Evaluation and Request for No Further Action
January 31,2017	EPA letter to NSA Bethesda for no further action determination for Facility-wide Groundwater
January 31, 2017	EPA letter to NSA Bethesda for no further action at SWMUs 32 and 33

Attachment #2
LIST of SWMUS and AOCs

SWMU/AOC	Description
SWMU 1	Building 256 Storage Facility
SWMU 2	Former Laboratory Waste Disposal Area
SWMU 3	Asbestos Burial Area
SWMU 17	Military Gas Station Waste Oil Tank
SWMU 20	AFRRI Mixed Waste Underground Storage Tanks
SWMU 22	Uniformed Services University of the Health Services Scintillation Fluid Disposal Facility
SWMU 23	Storm Sewer System
SWMU 32	Metal Storage Yard
SWMU 33	Million Dollar Hill
SWMU 35	Debris Disposal Area near Buildings 147 and 239
AOC 2	Building 42 UST and Building 53 UST
AOC 3	Removed UST
AOC 5	Building 188 UST
AOC 6	Power Plant Spill
AOC 11	USUHS Hydraulic Fluid Spill

R:\USNavFacEngCom405450\NMCBethesda\MapFiles\678295_Basewide_UFP_SAP\Figure 1 - Facility Location Map.mxd RMangan_ch2mhillenvg 9/21/2016

Naval Support Activity, Bethesda

Maryland

NSA Bethesda

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Legend

Facility Boundary

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Figure 1
Facility Location Map
Naval Support Activity Bethesda
Bethesda, Maryland

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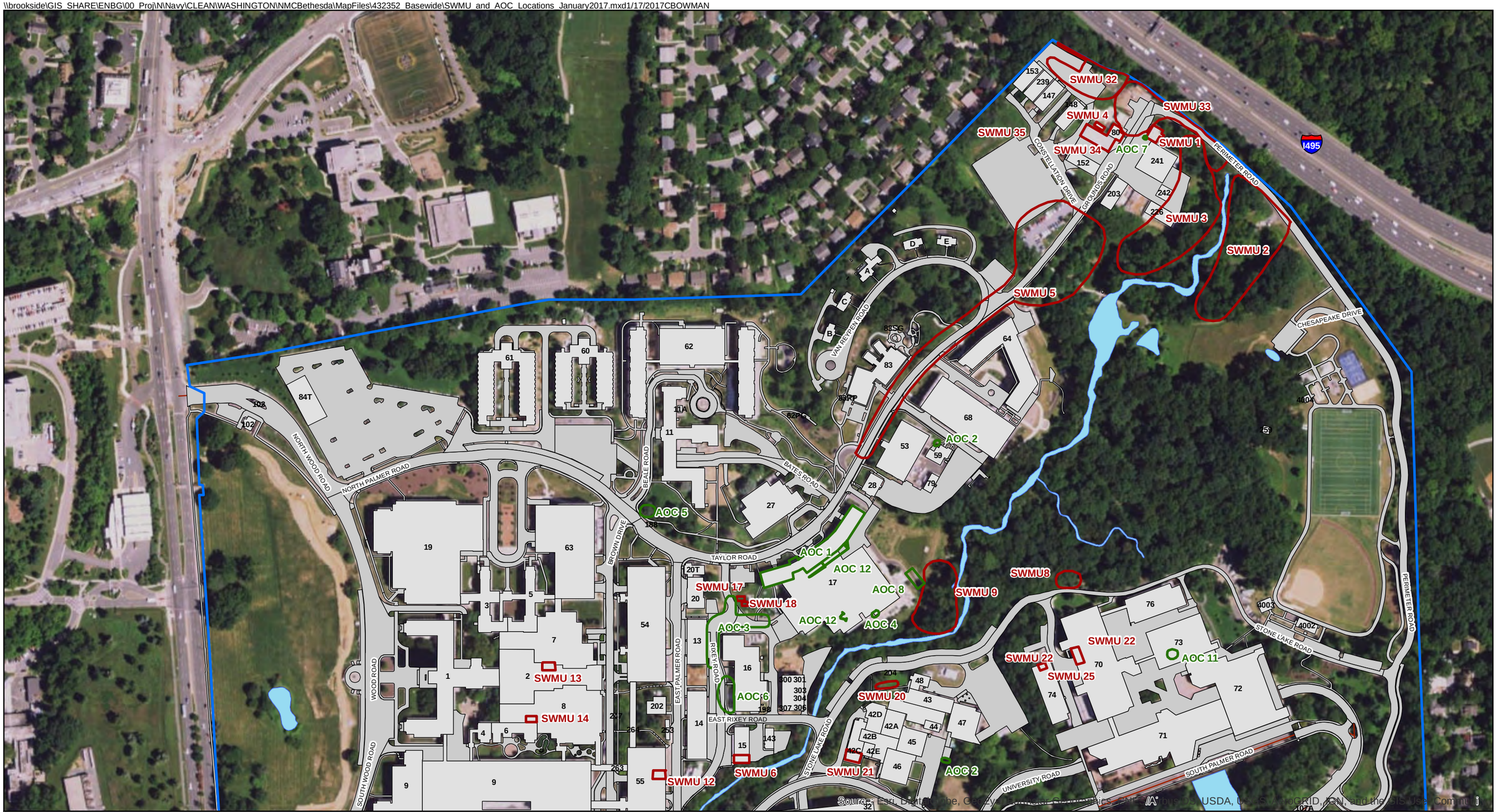

Legend

- Facility Boundary
- AOC Location
- SWMU Location
- Buildings
- Water Feature

Notes:
1. SWMU 28 is not shown; it is located south of area shown.
2. SWMU 23 is the entire storm sewer system at NSA Bethesda: piping, manholes, and Stoney Creek.

N
W E
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Feet

Imagery Source: 2016, ESRI

Figure 2
SWMU and AOC Locations
Naval Support Activity Bethesda
Bethesda, Maryland

ch2m.