



# Fort George G. Meade



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## Manor View Dump Site Non-Time Critical Removal Action (NTCRA) Workplan Preview

### Restoration Advisory Board Meeting September 15, 2011

Tom Crone — ARCADIS





# Manor View Dump Site



## TOPICS

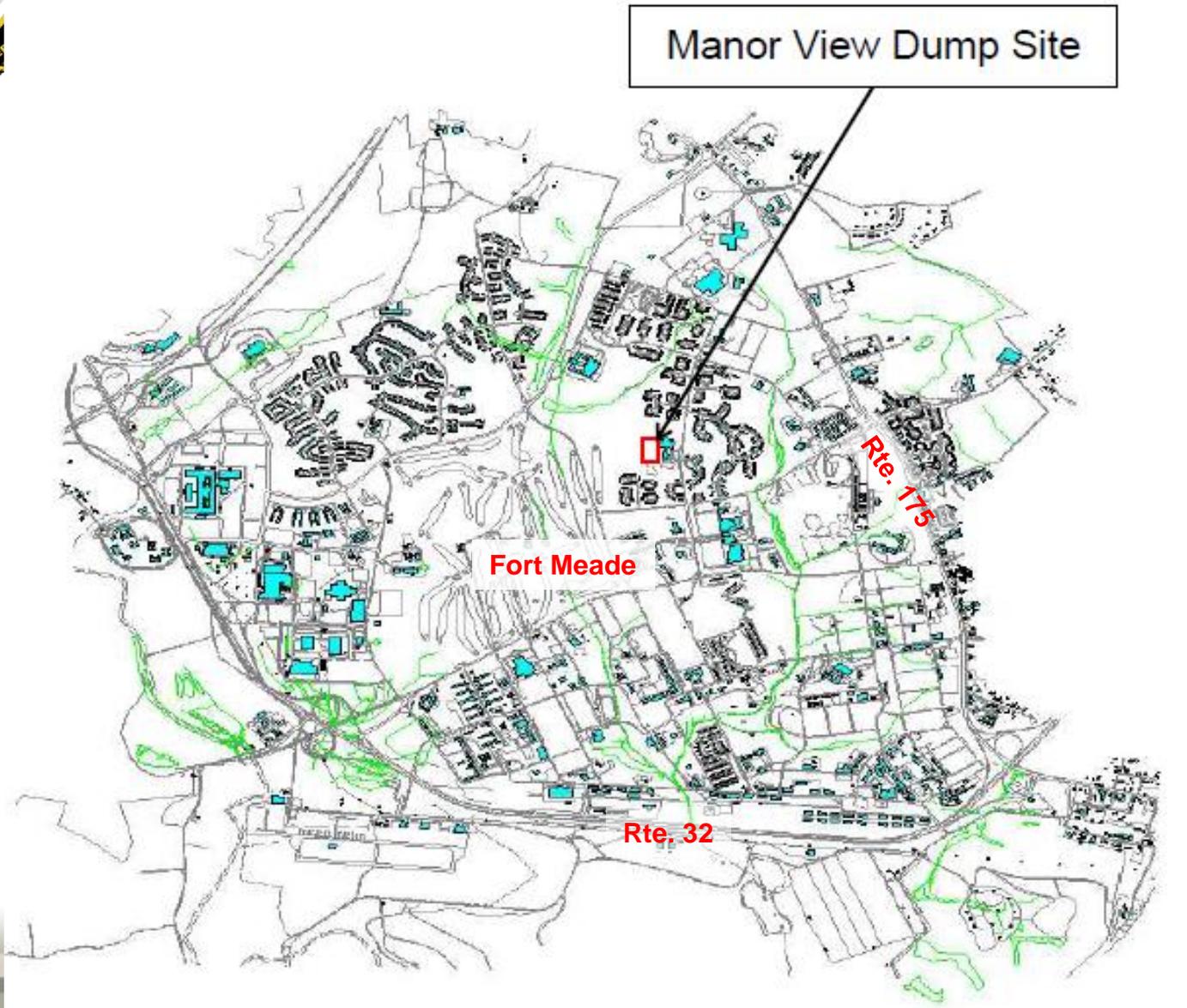
- Review of CERCLA and NTCRA Process
- Manor View Dump Site History
- Site Specific NTCRA Objectives and Status
- Summary of Removal Action Workplan
- Next Steps



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# Manor View Dump Site Location



# Manor View Dump Site





# CERCLA Overview



- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), (aka Superfund) enacted by congress on December 11, 1980
  - In part, as a result of Love Canal where Hooker Chemical dumped 20,000 tons of waste into canal in 1940s and 1950s
- Authorizes
  - Remedial response actions (long-term)
  - Removal response actions (short-term)



Love Canal, circa 1970



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# Remedial Response Process



1. Preliminary Assessment/Site Investigation (PA/SI)
2. Remedial Investigation (RI)
3. Feasibility Study (FS)
4. Proposed Plan (PP)
5. Record of Decision (ROD)
6. Remedial Design/Remedial Action (RD/RA)
7. Construction Completion/Remedial Action Report (RAR)
8. Post Construction Completion (Long term monitoring (LTM), Operation and maintenance (O&M), 5-Year Review)
9. Deletion from National Priorities List (NPL)



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# Removal Response Actions



Address an imminent and substantial danger to public health or welfare (defined by considering the following factors)

1. Exposure to humans, animals, or food chain from hazardous substances, pollutants, or contaminants
2. Contamination of drinking water or sensitive ecosystems
3. Hazardous substances in bulk storage containers that may pose a threat of release
4. High levels of hazardous substances in surface soils that may migrate
5. Weather conditions that may trigger migration or release
6. Threat of fire or explosion
7. Availability of other federal or state mechanisms to respond
8. Other situations which may pose threats to public health



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# Types of Removal Response Actions



Approval  
Memo

EE/CA

Public  
Comment

Action  
Memo

RAWP

NTCRA

IRAR

## 1. Emergency Response:

- PA/SI data indicate an immediate or short-term response action is required

## 2. Time Critical Removal Action:

- Conducted when the lead Agency determines that an accelerated removal action is necessary and a planning period of **six months is not available**
- Planning documentation and public comment streamlined

## 3. Non-Time Critical Removal Action:

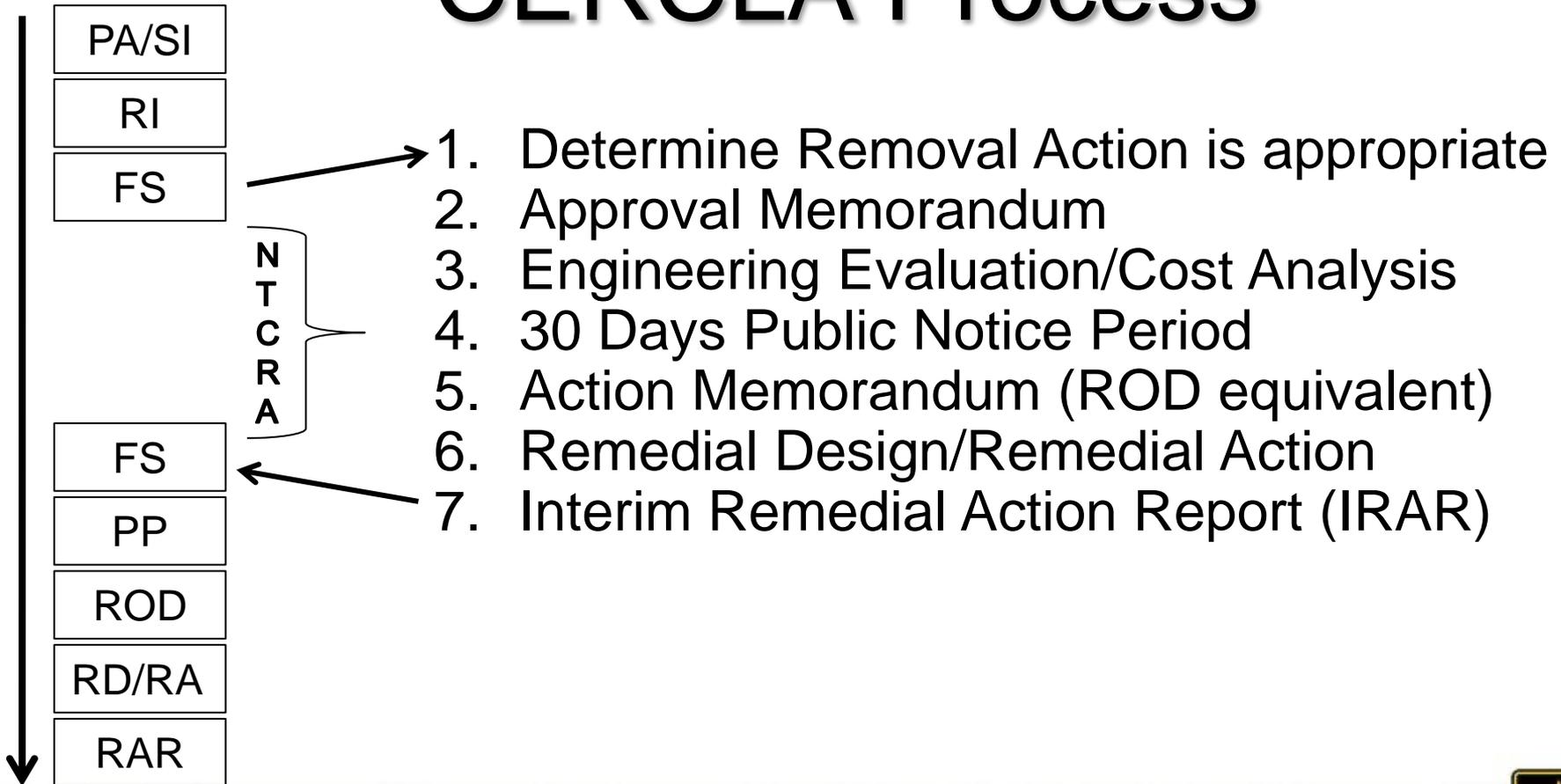
- Conducted when the lead Agency determines that a an accelerated removal action is appropriate but a planning period of **at least six months is available**
- Requires an EE/CA and 30 day public notice period



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# NTCRA Process and Integration into CERCLA Process

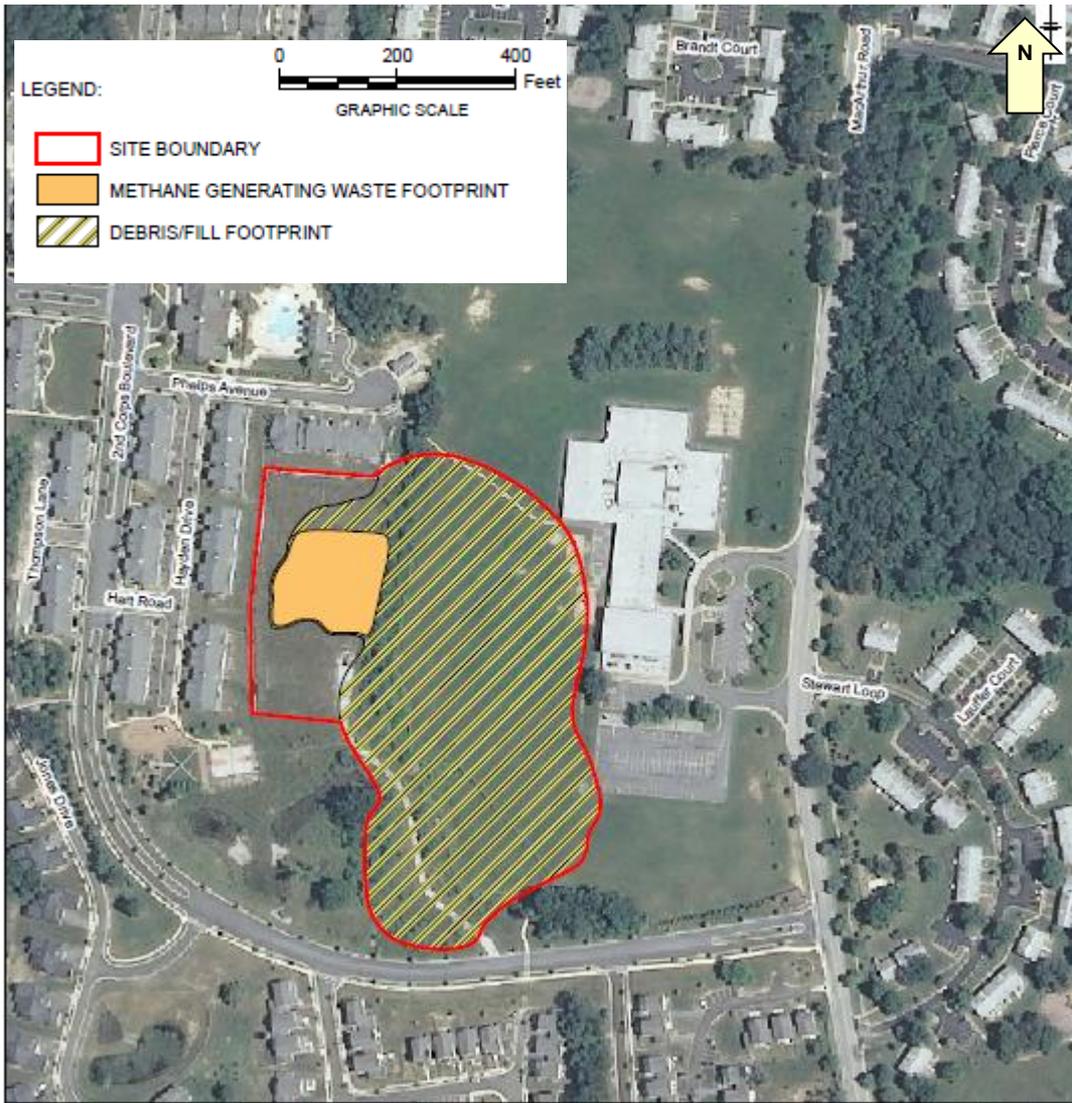




# Summary of Manor View Dump Site NTCRA Process and Draft Removal Action Workplan



# Manor View Dump Site Overview



- Waste discovered in 2003
- PA/SI completed in 2003
- RI completed by 2005
- Methane posed a safety hazard and Army housing evacuated in 2005
- Soil vapor extraction (SVE) system installed in 2005 and monitored weekly
- Draft FS prepared in Fall 2010



# Manor View Dump Site NTCRA



- Following preparation of Draft FS, the Army (with EPA and MDE concurrence) determined an accelerated removal action was appropriate
- Time required for the Final FS, PP, and ROD is protracted
- NTCRA process initiated in 2011



Potomac Place housing units directly east of Manor View Dump Site, June 2011





# Manor View Dump Site NTCRA



- Approval Memo documented NTCRA triggers:
  - The continued presence of methane presents an imminent and substantial endangerment to public health or welfare
    1. Actual or potential exposure to nearby human populations...from hazardous substances or pollutants or contaminants
    6. Threat of fire or explosion
- The RA is planned as a NTCRA because a planning period of at least six months exists before on-site activities can be initiated.
- A removal action addresses and removes the source of the hazard (methane production) rather than continuing to treat the symptom (controlling methane migration)





# NTCRA Progress



- |                                   |                                |
|-----------------------------------|--------------------------------|
| 1. Initiated NTCRA                | <b>Completed</b>               |
| 2. Approval Memorandum            | <b>Completed</b>               |
| 3. EE/CA                          | <b>Under Final Review</b>      |
| 4. 30 Day Public Notice Period    | <b>October – November 2011</b> |
| 5. Action Memorandum              | <b>In Progress</b>             |
| 6. Remedial Design                | <b>RD in Progress**</b>        |
| 7. Remedial Action                | <b>Winter 2011/2012</b>        |
| 8. Interim Remedial Action Report | <b>Spring 2012</b>             |

\*\*Once RD is finalized, the full scope and details will be presented at November 2011 RAB meeting, today will be a brief overview of the RA Workplan



# Preview of NTCRA Workplan



- Objective: *Provide a description of how the Army plans to eliminate or minimize the hazard posed by methane above its LEL that is being generated from wastes buried within the Manor View Dump Site*
- Describe process to remove all MSW capable of generating methane above lower explosive limit (LEL)
  - Waste occupies 1 acre portion on western edge of site
  - Waste is present from approximately 8-15 feet below ground surface
- Process to address remaining buried waste (construction debris) will be handled by the FS in 2012



# Preview of NTCRA Workplan



- Existing overburden soils will be removed, stockpiled, and utilized as backfill
- Approximately 7,200 cubic yards of waste will be excavated and trucked to a permitted off-post landfill
- All work will be in accordance with Maryland's Stormwater and Soil Erosion and Sediment Requirements
- Elimination of methane generating wastes will be verified during a post-removal monitoring period



Excavator loading soil for transportation and disposal



# Preview of NTCRA Workplan



Safe guards in place for:

- Noise - Operating practices and perimeter monitoring
- Dust - On-site/perimeter monitoring with suppression as required
- Odor- Perimeter monitoring with suppression as required
- Traffic controls - routes, times, etc.
- Methane - monitoring continues, SVE system remains in place (dormant)

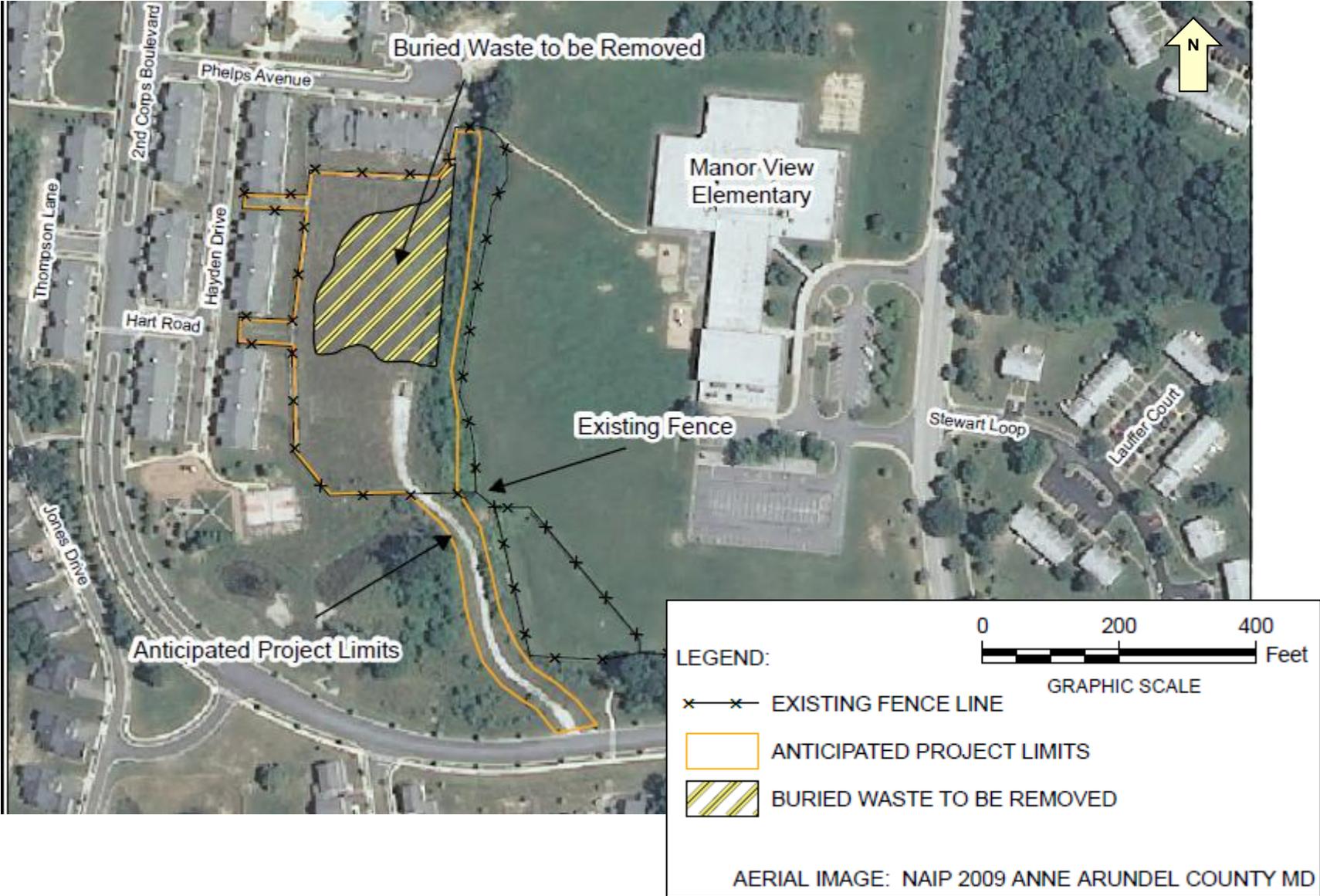


Potomac Place housing units  
directly east and north of  
Manor View Dump Site, June  
2011



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# NTCRA Project Limits





## Current Site Conditions



Proposed Site Conditions: chain link fence and above ground piping removed, building relocated, and site grading completed



# Manor View – Next Steps



September – November 2011

Preparing necessary NTCRA documents

October – November 2011

Public notice of completed EE/CA

December – February 2012

Conduct NTCRA (remove MGW)

February – Summer 2012

Finalize NTCRA IRAR and continue CERCLA process (FS, PP, and ROD)



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# Acronyms and Abbreviations



CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	RD/RA	Remedial Design/Response Action
EE/CA	Engineering Evaluation/Cost Analysis	RI	Remedial Investigation
EPA	Environmental Protection Agency	ROD	Record of Decision
FS	Feasibility Study	Rte	Route
IRAR	Interim Remedial Action Report	SVE	Soil Vapor Extraction
LEL	Lower Explosive Limit	TCRA	Time Critical Removal Action
LTM	Long Term Monitoring		
MDE	Maryland Department of the Environment		
MGW	Methane Generating Waste		
MSW	Municipal Solid Waste		
NPL	National Priorities List		
NTCRA	Non-Time Critical Response Action		
O&M	Operation and Maintenance		
PA/SI	Preliminary Assessment/Site Investigation		
PP	Proposed Plan		
RAR	Remedial Action Report		
RAWP	Remedial Action Work Plan		





# Points of Contact



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