Public Meeting Purpose

- U.S. Army is inviting the public to comment on the proposed environmental actions for the Former Pesticide Shop.

- Comments may be submitted during the 30-day comment period beginning August 8th and ending September 7th, 2012.

- Additional information on how to submit comments will be provided at the conclusion of this presentation.
**Status of CERCLA* Process**

- Remedial Investigation (RI) - characterization of site
- Feasibility Study (FS) - assessment of possible remedies
- Proposed Plan (PP) - solicit public input on preferred remedy
- Record of Decision (ROD) - legal documentation of remedy selection
- Remedial Design (RD) - remedy implementation plan
- Remedial Action (RA) - remedy implementation

*Comprehensive Environmental Response, Compensation, and Liability Act*

**Presentation Agenda**

- Site Information
  - Location
  - History
- Field Investigations
  - Summary of Findings
- Remedial Alternatives
- Preferred Alternative
- Public Comment Period Information
Site Location

Former Pesticide Shop
Aerial View

Site Location
Former Pesticide Shop

Background

• The former building (6621) was reportedly used as a Mess Hall for prisoners of war during WWII.

• Used as a pesticide shop for 20 years from 1958 through 1978 housing a maintenance facility for landscaping equipment.

• Building demolished and the Site graded in 1996.

Current Land Use

• The Site is presently a fenced-in lot with no structures.

• The site is grass covered and contains a few trees.
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RI Field Investigation

• RI fieldwork conducted between 1997 and 2010 to determine the nature and extent of impacts to soil and groundwater associated with past operations.

• Scope of the investigations were developed in partnership with U.S. Environmental Protection Agency (USEPA) and Maryland Department of Environment (MDE).
RI Field Investigation

- Soil sampling results revealed the presence of arsenic and several pesticides above screening levels.
- Groundwater sampling results indicated the presence of volatile organic compounds and pesticides above screening levels.
- Impacts in both soil and groundwater are limited to the general vicinity of the Former Pesticide Shop building.

Surface Soil Results--Pesticides
VOC Groundwater
Results above MCLs

- **4/15/2010**
  - TCE: ND
  - PCE: 93 ppb

- **6/2/2010**
  - TCE: 76 ppb
  - PCE: 260 ppb

- **4/15/2010**
  - TCE: ND
  - PCE: 12 ppb

- **6/2/2010**
  - TCE: 2.71 ppb
  - PCE: 25 ppb

**Drinking Water Standard**
- TCE: 5 ppb
- PCE: 5 ppb

Pesticide Groundwater
Results above MCLs

- **4/15/2010**
  - Gamma BHC: 0.8 ppb
  - Heptachlor Epoxide: 0.23 ppb

- **6/2/2010**
  - Alpha Chlordane: 2.4 ppb
  - Gamma Chlordane: 3.5 ppb
  - Heptachlor: 3.3 ppb

- **4/15/2010**
  - Alpha Chlordane: 4.1 ppb
  - Gamma Chlordane: 4.3 ppb

- **6/2/2010**
  - Alpha Chlordane: 4.8 ppb
  - Gamma Chlordane: 5.1 ppb

**Drinking Water Standard**
- Alpha Chlordane: 2 ppb
- Gamma Chlordane: 2 ppb
- Heptachlor: 0.2 ppb
- Heptachlor Epoxide: 0.2 ppb
- DDT: 0.1 ppb
Human Health Risk Assessment Results

- The human health risk assessment found no unacceptable risks under current land uses, including outdoor military maintenance workers.
- The Site could pose a non-cancer hazard to future construction workers who might construct buildings at the Site and be exposed to soil and groundwater.
- Adverse health effects could also occur to people from exposure to site constituents under a hypothetical future residential land use scenario.

Screening Level Ecological Risk Assessment Results

- Risks from a number of chlorinated pesticides are elevated for several species.
- Site is small (0.5 acres) and does not present significant ecological habitat.
- Further ecological risk evaluation was not deemed necessary.
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Feasibility Study

• An FS was conducted in 2012 to evaluate the ability of possible remedial alternatives to meet site objectives at the Former Pesticide Shop.

• The site objectives are:
  – Prevent human exposure to soil and groundwater that would cause unacceptable risk to human health.
  – Restore groundwater to beneficial use.
Feasibility Study

• The following remedial alternatives were developed:
  – **Alternative 1** – No Action;
  – **Alternative 2** – Land Use Controls (LUCs) with Long Term Monitoring (LTM) of Groundwater; and
  – **Alternative 3** – Soil Excavation with Off-site Disposal, LUCs, and Enhanced Reductive Dechlorination (ERD) with LTM for Groundwater.

Remedial Alternative Evaluation

As required by law, the alternatives were evaluated against nine criteria:

1. **Overall protection of human health and the environment.** Determines if the alternative provides adequate protection and describes how the alternative eliminates, reduces or controls risks.

2. **Compliance with applicable or relevant and appropriate requirements (ARARs).** Determines if the alternative meets all Federal and State environmental laws.

3. **Long-term effectiveness and permanence.** Determines the alternative’s ability to provide reliable protection of human health and the environment over time.

4. **Reduction of toxicity, mobility, and volume through treatment.** Refers to the preference for an alternative that reduces health hazards, the movement of harmful substances, or the quantity of harmful substances at the site.
Remedial Alternative Evaluation

5. **Short-term effectiveness.** Addresses time needed to complete the alternative, and any adverse effects to human health or the environment during implementation.

6. **Implementability.** Addresses the technical and administrative feasibility of an alternative, including the availability of materials and services.

7. **Cost effectiveness.** Evaluates the estimated capital, operating and maintenance costs of each alternative in comparison to other, equally protective alternatives. (30 years)

8. **State/Support agency acceptance.** [The Army is the lead regulatory agency] Indicates whether the State agrees with, opposes, or has no comment on the preferred alternative.

9. **Community acceptance.** Assessed after the public comment period. Includes components of the alternatives that the public supports, has reservations about, or opposes.

**• Alternative 1 - No Action**

– Not protective,
– Does not meet ARARs,
– No long-term effectiveness or permanence,
– No reduction in toxicity or mobility,
– Effective in short-term because there is no risk under current land use,
– Readily implemented, and
– No cost.
Remedial Alternative Evaluation

• Alternative 2 – LUCs with LTM of Groundwater
  – Human health risk controlled for future use scenarios,
  – Complies with ARARs identified,
  – Long-term effectiveness through control of exposure,
  – No reduction in toxicity or mobility,
  – Effective in short-term because there is no risk under current land use,
  – Readily implemented through existing LUCs, and
  – Relatively low cost.

Remedial Alternative Evaluation

• Alternative 3 – Soil Excavation with Off-Site Disposal, LUCs, and ERD with LTM of Groundwater
  – Future risks eliminated through removal of impacted soil and treatment of groundwater,
  – Complies with ARARs identified,
  – Long-term effectiveness and permanence through removal and treatment of impacted media,
  – Effective at treating and removing impacted material.
  – Effective in short-term because there is no risk under current land use and controllable risks to workers implementing remedy,
  – Moderately complex to implement, and
  – Highest cost but still cost effective.
Presentation Agenda

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Preferred Alternative

• Alternative 3 – Soil Excavation with Off-site Disposal, LUCs, and ERD with LTM of Groundwater
  • Soil Excavation and LUCs
    – Excavate and dispose of approximately 700 tons of impacted soil.
    – Pre-excavation sampling to refine limits.
    – Post-excavation confirmatory sampling.
    – LUCs include restricting site to industrial land use, signage, and fencing.
  • Groundwater Treatment and LTM
    – Emulsified Vegetable Oil (EVO) will be injected into groundwater to enhance naturally occurring biodegradation.
    – LTM includes installation of one new down-gradient monitoring well and regular groundwater sampling from site-related monitoring wells.
Soil Remedy

Soil Remedy—Approximate Area of Soil Removal

- Green: 0 to 2 feet bgs
- Light Yellow: 0 to 4 feet bgs
- Gold: 0 to 6 feet bgs
- Clear: 0 to 8 feet bgs
Groundwater Remedy

TCE and PCE Groundwater Results

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<th>Date</th>
<th>TCE</th>
<th>PCE</th>
</tr>
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<tbody>
<tr>
<td>4/15/10</td>
<td>ND</td>
<td>91 ppb</td>
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<tr>
<td>6/2/10</td>
<td>76 ppb</td>
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</tbody>
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Drinking Water Standard
TCE: 5 ppb
PCE: 5 ppb
Groundwater Remedy—EVO Injection

- Proposed EVO Injection line
- Groundwater Flow direction

Conceptual Design

- EVO Injection
- Overburden Clayey Sand with Gravel
- Groundwater Flow
- Clay and silt
Preferred Alternative

- Alternative 3 – Soil Excavation with Off-site Disposal, LUCs, and ERD with LTM of Groundwater
  
  - Soil Excavation and LUCs
    - Excavate and dispose of approximately 700 tons of impacted soil.

  - Groundwater Treatment and LTM
    - Emulsified Vegetable Oil (EVO) injection.
    - LTM will demonstrate effectiveness of remedy.
    - Duration anticipated to be on the order of 10 years.

Presentation Agenda

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Proposed Plan

- The PP will be available for public review from August 8th to September 7th in the Administrative Record located:
  
  Fort Meade Environmental Division  
  239 Chisholm Avenue  
  Fort Meade, MD 20755  
  
  Anne Arundel County Library  
  West County Area Branch  
  1325 Annapolis Rd  
  Odenton, MD 21113  

- Public comments will be reviewed and considered before remedy selection is finalized and documented in the ROD.
- The ROD for the Former Pesticide Shop will be finalized in September 2012.

Written Comments

- Comments will be accepted until September 7th, 2012.

- Send comments to any one of the following:

  Mary Doyle  
  U.S. Army Garrison- Fort George G. Meade  
  Public Affairs Office  
  4409 Llewellyn Ave.  
  Fort Meade, MD 20755

  Mr. John Burchette  
  USEPA Region III  
  1650 Arch Street  
  Philadelphia, PA 19103-2029

  Dr. Elisabeth Green  
  Maryland Department of Environment  
  1800 Washington Blvd, Suite 625  
  Baltimore, MD 21230-1719
Questions/Comments?

Acronyms

ARAR  Applicable or Relevant and Appropriate Requirements
CERCLA  Comprehensive Environmental Response, Compensation and Liability Act
DoD  Department of Defense
ERD  Enhanced Reductive Dechlorination
EVO  Emulsified Vegetable Oil
FS  Feasibility Study
LTM  Long Term Monitoring
LUC  Land Use Control
MCL  Maximum Contaminant Level
MDE  Maryland Department of the Environment
PP  Proposed Plan
Acronyms (Cont’d)

RA  Remedial Action
RD  Remedial Design
RI  Remedial Investigation
ROD Record of Decision
USEPA U.S. Environmental Protection Agency

Glossary

Administrative Record: This is a collection of documents (including plans, correspondence and reports) generated during site investigation and remedial activities. Information in the Administrative Record is used to select the preferred remedial alternative and is available for public review.

Applicable or Relevant and Appropriate Requirements (ARARs): The requirements found in federal and State environmental statutes and regulations that a selected remedy must attain. These requirements may vary among sites according to the remedial actions selected.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): This federal law was passed in 1980 and is commonly referred to as the Superfund Program. It provides for liability, compensation, cleanup, and emergency response in connection with the cleanup of inactive hazardous waste disposal sites that endanger public health and safety or the environment.

Feasibility Study (FS): This CERCLA document reviews the risks to humans and the environment at a site, and evaluates multiple remedial technologies for use at the site. Finally, it identifies the most feasible Response Actions.
Glossary (Cont’d)

Long Term Monitoring (LTM) – LTM is conducted to monitor the performance of the remedy over time. LTM includes groundwater sampling and reporting.

Land Use Controls (LUCs) – LUC are physical, legal, or administrative mechanisms that restrict use of or limit access to, real property, to manage risks to human health and the environment. Physical mechanisms encompass a variety of engineered remedies to contain or reduce contamination and/or physical barriers to limit access to real property, such as fences or signs.

Operation and Maintenance (O&M): Annual post-construction cost necessary to ensure the continued effectiveness of a Response Action.

Preferred Remedy – The MEC remediation approach that appears to best meet acceptance criteria; the remedial option proposed for implementation in the ROD.

Record of Decision (ROD): This legal document is signed by the Army and the USEPA and will be reviewed by the MDE for concurrence. It provides the cleanup action or remedy selected for a site, the basis for selecting that remedy, public comments, responses to comments, and the estimated cost of the remedy.

Glossary (Cont’d)

Remedial Investigation (RI): An investigation under CERCLA that involves sampling environmental media such as air, soil, and water to determine the nature and extent of contamination and human health and environmental risks that result from the contamination.