

**Naval Surface Warfare Center-White Oak
Restoration Advisory Board
10901 New Hampshire Avenue
Silver Spring, MD 20903-5640**

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Director, EPA Region III
841 Chestnut Building
Philadelphia, PA 19107

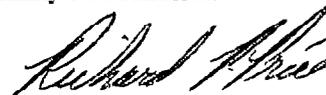
SUBJECT: BRAC Environmental Cleanup Efforts at NSWC-White Oak Pursuant to Re-Use

1. The community members of the Naval Surface Warfare Center (NSWC)-White Oak Restoration Advisory Board (RAB) have expressed a number of concerns regarding the environmental remediation and restoration of the base pursuant to transfer of the property to GSA for re-use. As a result of our meeting yesterday at NSWC, I thought it would be appropriate to document our concerns and forward them to you as you consider the possibility of enforcement action to determine the existence of and/or removal plans for any eminent health hazards at NSWC.
2. Considerable discussion yesterday revolved around Local Reuse Authority (LRA) and RAB issues concerning the potential impact of groundwater contamination and the existence of numerous sites which have not been cleaned up or adequately characterized. In 1989, initial sampling of several sites at NSWC revealed groundwater contamination. Since that time there have been no Navy efforts to expand upon the 1989 sampling effort to determine the extent of the contamination plumes, nor to determine whether or not contaminated groundwater is migrating off-site into the local community. Action was taken last year by OHM, Inc., under a Navy task order contract to perform a source removal action (with off-site disposal of contaminated soil) at IR sites 8, 9, and 11. A post-removal risk assessment was then performed by Brown and Root, Inc., to determine whether this action was adequate. However, the risk assessment only addressed the health hazards associated with soil ingestion and soil skin contact, not groundwater movement of contaminants into the surrounding community; despite the fact that site 8 (an abandoned disposal pit) is less than 20 meters from the Hillandale community.
3. Additionally, two homes on Powder Mill Road are soon to be taken off well water due to the Army's recent discovery of TCE contamination on off-post residential property. Last year, sampling by the Army Research Laboratory revealed increasing levels of TCE concentration as the sampling sites approach the NSWC fence, leading to the assumption that there is a source of TCE around an abandoned NSWC centrifuge now called site 46. Navy sampling has not yet been performed to determine either the source or extent of this contamination.
4. In fact, one of the difficulties with the scarce data we do have, is the fact that we do not have any definitive background levels for NSWC nor a comprehensive baseline for comparison. The OHM risk assessors were troubled by levels of inorganic chemicals found within the residual soil, and in fact were not certain as to whether or not the levels of inorganics found are attributable to normal "background."
5. There are some other RAB concerns. Last year the RAB was briefed that no further action was necessary on IR sites 10 and 14 and now there has been an additional radiation risk identified. Two months ago the RAB was briefed that only 50 pounds of explosives remained at White Oak and last month we were informed that an additional 450 pounds had been "discovered" in one of the buildings. Explosives are an extremely sensitive issue to the surrounding community in light of the 1992 bunker explosion at White Oak resulting in damages to homes in the surrounding community. And finally, the RAB was briefed two months ago that the landfill cap design was 35% complete, and we have just been informed by our landfill subcommittee that, in fact, the capping approach has not even been decided.

6. On the management side of cleanup efforts, a new Base Environmental Coordinator was introduced at the February RAB meeting, and then he announced his resignation at the March meeting. We have had three Officers-in-Charge at White Oak in the last year, and even this position will disappear in July. We have had two remedial project managers in the last year. There still is not a detailed base cleanup plan, and there is considerable concern that future potential private development partners will hesitate to invest resources in a base which does not have an environmentally clean bill of health or specific remediation plan and schedule. At the RAB meeting in March the GSA representatives informed the members present that given the current state of uncertainty, they would not be inclined to accept the Navy transfer of property without some strong assurance that these issues will be dealt with. Additionally, EPA concerns over lack of progress in dealing with the issues identified above, has led to EPA deliberations with Navy over enforcement actions to assure that there are no eminent health hazards to the local community. The draft MOA between the Navy and GSA was presented to the RAB over a year ago and still has not been signed.

7. The local community has supported the NSWC-White Oak, as a neighbor, in all efforts first, to facilitate the planned NAVSEA move to White Oak, second, to lobby for reconsideration of the 1995 BRAC decision to close the base, and third, failing in the other efforts, to facilitate and expedite transfer of the base to GSA, which plans to offer the base for re-use in consolidating FDA on part of the property and orchestrate other possible public/private partnership re-use. The RAB charter is to provide information, suggestions, and community input into the environmental decision making process. We feel that we have done that. Our goal is to assure the communities that we represent that environmental/health hazards are properly identified and dealt with in accordance with national, state and local regulatory guidance. Our objective is to ensure the best use of this property by any and all potential neighbors who will reside or work there. At the present time we do not feel we can meet either our goal or objective.

8. At the meeting yesterday, the Navy requested we wait until the 23 April RAB meeting to allow CAPT Sabbatini, Commanding Officer, Engineering Field Activity, Chesapeake, to make a presentation regarding the future plans and resources for environmental restoration of the base. However, it is unfair to put the burden on him for past omissions. The RAB frustration is not about future plans, it is about the many years of inactivity in investigating the extent of environmental hazards and the recent failures to communicate the seriousness of regulatory concern about environmental issues to the RAB. The Navy had a formal closing ceremony last October and has announced its intention to vacate the remaining workforce on 31 July. Yet we still have no MOA between the Navy and GSA regarding transfer, nor any definitive answers for the community, or potential re-use partners, on the extent of environmental remediation still required, nor even begun a groundwater contamination risk assessment, which has been repeatedly asked for by the RAB. The Navy has publicly stated its commitment to give the highest priority of BRAC restoration to bases with immediate re-use plans. We urge the EPA, as the senior regulating official and member of the BRAC Cleanup Team at White Oak, to use the resources available to you to assure that the Navy commits to and executes an accelerated assessment and cleanup plan. Without such commitment and resource dedication, we are concerned that this project will continue to languish, and the potential risk to the adjacent community will continue.


RICHARD P. PRICE
Community Co-Chair

cc: RAB members
CAPT Sabbatini, EFA Chesapeake
Jag Bhargava, GSA
Bob Craig, ARL
Ernie Lunsford, FDA
Betsy Bretz, LRA
Bob Greaves/ Hank Sokolowski, EPA