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NSWC WHITE OAK
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William H. Potterton
Project Director
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10903 New Hampshire Ave
Suite 1-270
Silver Spring, MD 20903-1049

Subject: Environmental Condition of Site 11
Former Naval Surface Warfare Center (NSWC) White Oak
Proposed Food and Drug Administration (FDA) Campus
Silver Spring, Maryland

Dear Mr. Potterton,

The members of the NSWC White Oak Base Realignment and Closure (BRAC) Cleanup Team (BCT) have been investigating the environmental condition of the former naval research facility to characterize the property, assess the potential risks to current and future users, and determine the best course of action for remediation. Because of the planned construction of the FDA Center for Drug Evaluation and Research (CDER) at the former NSWC White Oak and the proposed development of a larger FDA research facility at the same site, the BCT has prepared this letter to inform you of the current environmental condition of the property and its impact on future development. The BCT consists of representatives from the U.S. Environmental Protection Agency Region 3 (EPA Region 3), Maryland Department of the Environment (MDE), and U. S. Navy Engineering Field Activity Chesapeake (EFACHES), with adjunct membership extended to the General Services Administration.

As part of the ongoing environmental work, the BCT has characterized a combined total of 123 Installation Restoration Program (IRP) sites, Resource Conservation and Recovery Act (RCRA) Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), and Environmental Baseline Survey (EBS) AOCs across NSWC White Oak. The characterization efforts involved the collection and analysis of environmental samples from various media (soil, groundwater, sediment, surface water, and air) and the completion of geophysical surveys, topographic surveys, and hydrogeologic tests. Data from these investigations have been used to calculate site-specific risks to human health and the environment under the current land-use conditions and also with the various planned and hypothetical land-use scenarios throughout the facility. Where unacceptable risks were identified, the collected data have been or are being used to develop corrective action plans to mitigate these risks. At a number of the sites, the site characterization efforts, which included the review of contaminant levels, pathways, and receptors using applicable screening criteria and professional judgment, revealed that no further action was needed under industrial or residential land-use scenarios.

It is the understanding of the BCT that the proposed FDA campus will occupy the area of Installation Restoration (IR) Site 11 in the 100 Area of the former NSWC White Oak. IR Site 11 (industrial wastewater disposal 100 area) consists of a series of wastewater leaching wells where lab wastes were disposed prior to installation of an area-wide sanitary sewer system. Wastes disposed through the leaching wells percolated into the site subsurface soils and eventually reached the groundwater in the 100 Area. The results of the investigation of Site 11 identified elevated concentrations of several volatile organic and inorganic contaminants in groundwater. The investigation also revealed the presence of polychlorinated biphenyl (PCB)-contaminated surface water and sediment in an isolated drainage ditch east of the site. This PCB contamination, which is unrelated to the former leaching well operation, is being delineated for remediation and the drainage ditch is currently identified as IR Site 47. While contamination is present, investigations have shown that the concentration and location of the groundwater contamination at Site 11 pose no risk to the planned site users (through construction and

occupation of the FDA campus) and the risks associated with the surface water and sediment contamination at Site 47 can be easily mitigated. Those risks are discussed below.

As part of the Site 11 characterization, a human health risk assessment was performed to characterize the potential risks to likely human receptors under current and future land uses. The potential receptors that were evaluated were full-time workers, maintenance/utility workers, construction workers, recreational users, trespassers, daycare center children, and hypothetical child and adult residents. The risk assessment determined acceptable risks for full-time workers, maintenance/utility workers, adult recreational users, and daycare center children. Elevated non-carcinogenic human health risks were identified for construction workers and adolescent trespassers associated with exposure to PCBs in sediment (Site 47). However, the sediment contamination responsible for the elevated site risk is limited in extent and is a great distance removed from the CDER lab construction area. As mentioned above, this area has been designated Site 47; further delineation of the contamination is underway, and, ultimately, the risk will be mitigated through remediation of the site. Delineation and remediation (including sediment removal) are planned to be complete in 2001.

In order to make the most conservative decisions related to site risks, hypothetical land-use scenarios were also evaluated during the Site 11 and Site 47 risk assessments. The hypothetical land-use scenarios that were evaluated included the use of the property for residential purposes. When evaluating the potential use of the property for residential purposes, the BCT identified elevated non-carcinogenic human health risks for hypothetical child and adult residents through exposure to PCBs in sediment at Site 47 and exposure, by way of unplanned potable water use, to chloroform, arsenic, and perchlorate in groundwater at Site 11. Cancer risks for future residents also exceeded the upper limit of the EPA target risk range. The elevated cancer risks for these receptors were due to exposure to PCBs in surface water and sediment at Site 47. As stated previously, remedial work to mitigate the risks associated with the PCB contamination is planned to be complete next year and will eliminate this hypothetical residential risk.

The remaining risk issue not yet addressed at Site 11 is the exposure to groundwater contamination through unplanned potable water use. To address this issue, a Corrective Measures Study (CMS) is being performed that evaluates available remedial options to restore site groundwater in order to permit its unrestricted use. Potential treatment options to be evaluated range from active groundwater extraction and treatment to the long-term monitoring of natural contaminant degradation processes.

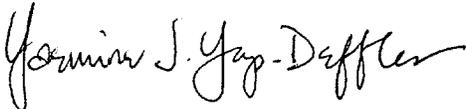
Given the planned site reuse and the unlikely use of groundwater as a potable source, the need for aggressive, active groundwater remediation may not be warranted. However, if needed, the Navy will treat any contaminated groundwater encountered during construction in accordance with applicable standards. It is a goal of the BCT to apply a timely, cost-effective, and practical solution to the groundwater contaminant issue at Site 11 and other sites at NSWC White Oak. Therefore, the application of a remedy that permits the natural degradation of groundwater contaminants over a longer time period compared with more aggressive remediation technologies may be determined to be the best available alternative. This evaluation is ongoing and a final decision will be made through the completion of the CMS.

When the final remedial action alternatives are selected for Sites 11 and 47, public input will be solicited through the development of a Proposed Plan (PP). The PP is a public participation document and summarizes the site contamination issues and provide a description of the selected remedy based upon the current and future land-use scenarios. A public comment period will be provided and public hearing will be held to give the public the opportunity to comment on the selected remedies. Following receipt of all comments, the remedial action is selected and the rationale is documented in the Record of Decision (ROD). The ROD is the final remedial action plan for the site. GSA will be kept informed throughout the process, and their input will be incorporated into the final remedial action plan, as appropriate.

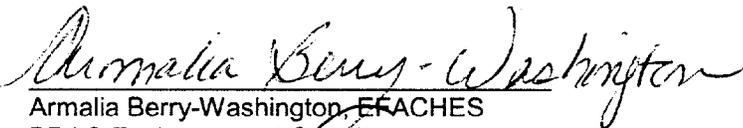
In conclusion, based upon the characterization efforts completed to date, the known condition of the property, its planned reuse, and the completed risk assessment, no unacceptable risks are present or are to be expected in association with the proposed construction and occupation of the FDA campus.

The members of the BCT would be happy to meet with you to discuss the characterization of the Site 11 and the remainder of the former NSWC White Oak property. Please feel free to contact Walter Legg (202) 685-0061 with any comments or questions.

Very truly yours,



Yazmine Yap-Deffler, EPA Region III, RPM



Armalia Berry-Washington, EFACHES
BRAC Environmental Coordinator



cc: John Allen, Director, GSA Maryland North Service Delivery Team
Steven Richard, Chief, Safety, Environmental and Fire Protection Branch