Update to the
U.S. Army BRAC 2006 and 2010 Update
Environmental Condition of Property Report
Walter Reed Army Medical Center, Main Post
Washington, D.C.

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Walter Reed Field Activity

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LIST OF ACRONYMS:

ACM	Asbestos Containing Materials
AEDB	Army Environmental Database
AFIP	Armed Forces Institute of Pathology
AST	Aboveground Storage Tanks
BRAC	Base Realignment and Closure
BFPD	Backflow Prevention Device
CAP	Corrective Action Plan
CEM	Continuous Emissions Monitoring
CEO	Caretaker Environmental Office
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESQG	Conditionally Exempt Small Quantity Generator
CMS	Central Monitoring System
DDOE	District of Columbia Department of the Environment
DOS	Department of State
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
EPA	Environmental Protection Agency
EQ	Environmental Quality
EQR	Environmental Quality Report
ERNS	Emergency Response Notification System
FINDS	Facility Index System
FTTS	FIFRA / TSCA Tracking System
FUDS	Formerly Used Defense Sites
GHG	Greenhouse Gas Emissions
HMMS	Hazardous Materials Management System
HAS	Historical Site Assessment
HSMS	Hazardous Substances Management System
HW	Hazardous Waste
LBP	Lead-based Paint
LQG	Large Quantity Generator
LUST	Leaking Underground Storage Tank
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFA	No Further Action
NOI	Notice of Infraction
NOV	Notice of Violation
NOx	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
NPS	National Park Service
NRC	Nuclear Radiological Commission

PADS	Polychlorinated Biphenyls Activity Database
PCBs	Polychlorinated Biphenyls
PHC	U.S. Army Public Health Command
POL	Petroleum, Oil**,** and Lubricants
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Concern
RMW	Regulated Medical Waste
SDWA	Safe Drinking Water Act
SEP	Supplemental Environmental Project
SQG	Small Quantity Generator
TCLP	Toxic Chemical Leaching Procedure
TRC	Total Residual Chlorine
UST	Underground Storage Tanks
US AIRS	United States Aerometric Information Retrieval System
VCP	Voluntary Cleanup Program
WRAMC	Walter Reed Army Medical Center

1. BACKGROUND

In December 2006, the Department of the Army released the U.S. Army BRAC 2005 Environmental Condition of Property Report (ECP) for Walter Reed Army Medical Center (WRAMC), Main Post, Washington, D.C. As stated in the Executive Summary, the purpose of that report was "to determine the environmental condition of [WRAMC] in preparation for a Real Property Disposal as a result of the Base Realignment and Closure (BRAC) recommendation to close [WRAMC Main Post] in September 2011." An update was completed in 2010.

2. PURPOSE

The purpose of this 2013 ECP Update is to provide information on changes in environmental conditions since the completion of the 2006 ECP and the 2010 update. The 2006 ECP refers to the 110.3 acres of WRAMC Main Post, Washington, D.C. as "the Property" and this definition shall also be used in this 2013 Update. Figure 1 shows the proposed parcel division for property conveyance.

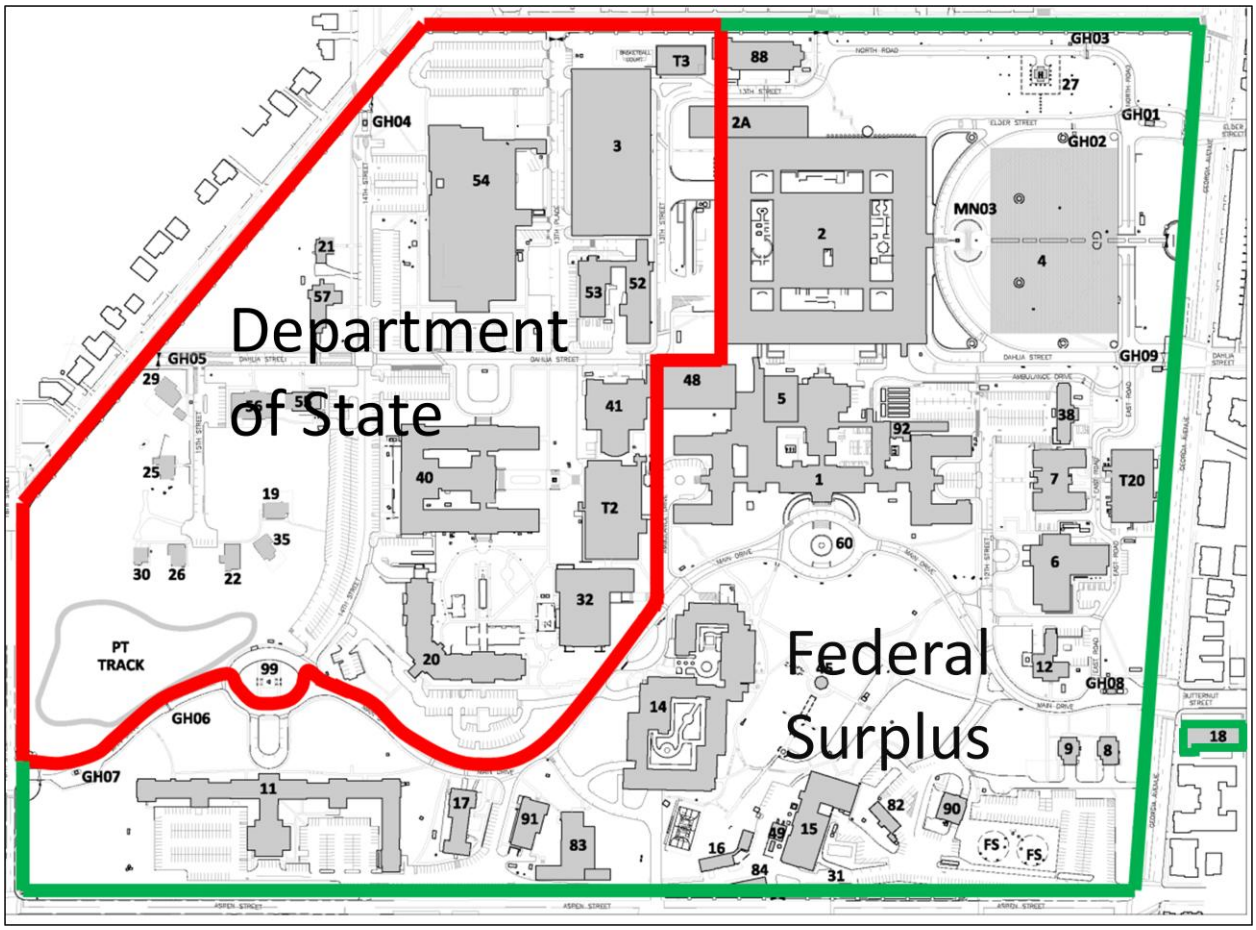

Figure 1. WRAMC Proposed Parcel Division After BRAC 2005 Closure.

3. METHODOLOGY AND LIMITATIONS

This 2013 ECP update was completed by the Former WRAMC Caretaker Environmental Office (CEO) staff through site inspections, records review, and interviews. CEO staff reviewed the 2006 ECP, and the 2010 update and provided known updates to the environmental program areas and the recognized environmental concerns (RECs) identified in the 2006 ECP. This 2013 update is based on information obtained from available records at WRAMC; therefore, there may be data gaps in the information presented. This ECP update does not satisfy the purchaser's duty to conduct "innocent purchaser defense" to the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Section 107.

This 2013 Update to the ECP document will address updates to the following programmatic areas:

A. Environmental Data Resources, Inc. Database Search
B. Air Emissions
C. Storage Tanks
D. Hazardous Substances
E. Resource Conservation and Recovery Act (RCRA) Hazardous Waste Program
F. Wastewater-DC WATER Permit
G. Storm Sewer and Wastewater-National Permit Discharge Elimination System (NPDES) Permit
H. Drinking Water
I. Recent Polychlorinated Biphenyl (PCB)
J. Asbestos Containing Materials (ACM)
K. Lead and Lead-Based Paint
L. Pesticides
M. Solid Waste
N. Radiological Materials, Nuclear Regulatory Commission (NRC) License
O. Biological Decontamination/General Decontamination
P. National Historic Preservation Act Compliance
Q. Updates to Recognized Environmental Concerns from 2006 ECP

4. FINDINGS

A. EDR DATABASE SEARCH:

An EDR database search and the resultant report and with the supplemental documents, titled "2013 EDR.pdf", is included in Appendix A-1. The table below lists the differences between the 2006, 2010 and 2013 EDR reports.

Database	Sites reported 2006	Sites reported 2010	Sites reported 2013	Comments
Federal CERCLIS sites	1 site (Subject Site)	1 site (Subject Site)	2 sites (includes Subject Site)	Subject Site – No new information reported in 2013. The most recent data from all EDR reports is a 1994 priority level of "higher priority for further assessment". Walter Reed is not listed on the National Priority List (NPL); this information was not noted in the 2006 ECP. Walter Reed does not appear on the EPAs lists of Federal Facilities or D.C. Superfund sites, which includes non-NPL sites that EPA is tracking. Belair Cleaners – located just under 0.5 mile south of the subject site, this site first appears in the 2013 EDR report, with little detail provided. This site is not listed on the NPL and does not appear on the EPAs lists of Federal Facilities or D.C. Superfund sites, which includes non-NPL sites that EPA is tracking.
Federal Resource Conservation Recovery Act (RCRA) Large Quantity Generator	1 site (Subject Site)	1 site (Subject Site)	0 sites	The subject site became a small quantity generator (SQG) in 2012. Since 2006 the following violations were noted during annual DDOE Compliance Evaluation Inspections at the subject site: one used oil violation from the 28 July 2008 inspection, as previously reported, and one universal waste violation from the 19 July 2010 inspection. Both violations were

Database	Sites reported 2006	Sites reported 2010	Sites reported 2013	Comments
(LQG) sites				satisfactorily addressed.
Federal RCRA SQG & CESQG sites	5 sites	3 sites	3 sites (Includes subject site)	- The subject site became a small quantity generator in 2012 and was first listed in this reporting database in the 2013 EDR report. While not in the EDR report, firsthand information indicates no violations were noted during the most recent DDOE Compliance Evaluation Inspection performed on 27 March 2013. - Tito Contractors at 7308 Georgia Avenue is listed as a SQG in all EDR reports reviewed (2006, 2010, and 2013). - CVS Pharmacy #1364 at 6514 Georgia Avenue is listed as a SQG in the 2013 EDR report. This site was not listed in the 2006 and 2010 EDR reports. The following sites were listed as SQGs in the 2006 and/or 2010 EDR reports, but are not included as current generators in the 2013 EDR report: Dunifab, Inc. (also referred to as Exxon Mobile 25363), Poretsky Building Group, Rex Cleaners, PEP Boys No. 408, and the Sunoco Service Station.

Database	Sites reported 2006	Sites reported 2010	Sites reported 2013	Comments
Federal ERNS sites	2 sites 3 reports	1 site 3 reports	1 site (Subject Site)	The 2013 EDR includes only one report for the subject site regarding 50 gallons of fuel released in 2005 that was contained within the storm drain and no waterways were impacted. The 2006 EDR lists two ERNS reports for the subject site and one ERNS report as an adjacent private residence at 6900 Georgia Ave, NW. The 2010 EDR report does not include any additional reports, but attributes all three to the subject site.
Federal PCB Activity Database (PADS) sites	1 site (Subject Site)	No sites reported	1 site (Subject Site)	Similar PCB activity information is reported in either the FTTS database or the PADS database. The subject site is reported in the PADS database in the 2013 EDR report as a generator of PCB waste. The 2010 EDR report indicates two historic FTTS reports for the subject site (1987, 1988).
FIFRA / TSCA Tracking System (FTTS) sites	No sites reported	1 site (Subject Site)	No sites reported	The 2013 EDR report lists the subject site as a Federal FINDS site, which includes facility information and pointers to additional databases. The 2006 ECP report indicates the applicable search distance as limited to the subject site, but lists the subject site and seven additional sites as identified in the FINDS database. The 2010 EDR report did not report the subject site in the FINDS database.
Federal FINDS sites	8 sites	No sites reported	1 site (Subject Site)	

Database	Sites reported 2006	Sites reported 2010	Sites reported 2013	Comments
Federal FUDS sites	No sites reported	2 sites	1 site	Fort DeRussy –The 2013 indicates only that the Baltimore District of the Corps of Engineers performed some work at this site in fiscal year 2009. The Friends of Fort DeRussy (fortderussy.org) reports that this Civil War era FUD site, located in Rock Creek Park, is now maintained by the National Park Service (NPS). Fort Stevens (previously reported in the 2010 EDR report and not included in the 2013 EDR report) – Wikipedia reports that this Civil War era FUD site, located at 13th Street and Quakenbos Street, is now maintained by the NPS
DC LUST sites	21 sites	27 sites (Includes subject site)	27 sites (Includes subject site)	One open LUST case is reported in the 2013 EDR – LUST #2010011, entered 9 September 2010 for gasoline contamination of soil and groundwater. Caretaker staff at the subject site is actively working with DDOE to address this contamination. Additionally, two of the properties listed in 2010 EDR are under different names in the 2013 EDR, but reference the same addresses as previously reported. The Exxon Mobile site at 7401 Georgia Ave. is now owned by Dunifab, Inc. and the Paks Properties site at 6300 Georgia Ave. is now owned by Clearview 6300.

Database	Sites reported 2006	Sites reported 2010	Sites reported 2013	Comments
DC UST sites	25 sites	19 sites (Includes subject site)	19 sites (Includes subject site)	No changes in the 2013 EDR report. Lists six USTs currently in use at the subject site: 2x400K heating oil, 1x3K diesel, 1x20K diesel, 1x2.5K diesel and 1x6K diesel. The 20,000 gallon diesel tank is temporarily out of use and Caretaker staff is in the process of removing this UST.
DC AST sites	1 site	1 site	1 site	No change or additional information in the 2013 EDR report. The site, Normandie Apartments at 6817 Georgia Ave., NW, was not detailed in the 2006 ECP report. The 2010 EDR report indicates that a 5,000-gallon heating oil AST, owned by Borger Management, Inc., is currently in use at this site. This site is located across Georgia Avenue, opposite the southeast corner of the Walter Reed property.
DC VCP sites	No sites reported	1 site	1 site	No change or additional information in the 2013 EDR report. The 2010 EDR report lists Gables Residential, at 7035 Blair Road, as a VCP site located between 0.25 and 0.5 miles from Walter Reed. From the information reported in EDR, it appears this site was originally a LUST site at the end of 2006 and beginning of 2007 with diesel contaminated soil. The site then participated in the VCP in early 2007 to address petroleum, BTEX and MTBE contamination in the soil and groundwater. The EDR report indicates that the

Database	Sites reported 2006	Sites reported 2010	Sites reported 2013	Comments
				associated cleanup was completed 2 June 2009.
Historic Auto Stations	No Information provided	4 sites	5 sites	The 2013 EDR reports one additional historic automobile station: Walter Reed Exxon at 7401 Georgia Ave. This Exxon station is still present north of the subject site, on the opposite side of Georgia Avenue at the intersection with Geranium St. NW. The site owner is referred to as Dunifab, Inc. in other databases from the 2013 EDR report. The 2013 EDR report indicates that No Further Action is required regarding one reported LUST case at this site from 1987.
Historic Cleaners	No Information provided	9 sites	9 sites	No change or additional information in the 2013 EDR report.
US AIRS	No Information provided	No Information provided	1 site (Subject Site)	New database in the 2013 EDR report. Indicates the subject site has a Title V permit, meeting state compliance schedule, and is a greenhouse gas reporter.

B. AIR EMISSIONS

UPDATED INFORMATION:

Supplemental Environmental Projects (SEP)

The 1999 Notice of Violation (NOV) mentioned in the 2006 ECP was administratively resolved through the implementation of a Supplemental Environmental Project (SEP) with the Environmental Protection Agency (EPA) and District of Columbia Department of the Environment (DDOE). WRAMC completed the implementation of the SEP by installing low nitrogen oxides (NOx) burners on boilers 1, 2, and 4. WRAMC submitted the SEP implementation completion report on December 22, 2010.

Under low loading (current) conditions, low NOx burners are not efficient at reducing NOx emissions. To address NOx limit provisions when operating below the NOx burner capability, WRAMC submitted new permit applications for boilers 1, 2, and 4 on May 24, 2011, as requested by the DDOE. WRAMC continues to operate and be in compliance with the current 2000 Title V permit. The table below depicts the limits.

Boiler NOx Limits, # One Million British Thermal Units **(MMBTU)**

Boiler	Title V Permit (gas and oil) (2000)
1	0.25
2	0.25
3	0.1
4	0.30

Air Compliance Inspections

The EPA and DDOE conducted a joint inspection to review WRAMC's Air program in April 2011. The final inspection report stated that WRAMC is operating in compliance with all Title V permit conditions.

Air Compliance Regulations

National Emission Standards for Hazardous Air Pollutants (NESHAP):

WRAMC is exempt from the Boiler NESHAP regulations since the boilers are operated on fuel oil only during curtailment.

Greenhouse Gas Emissions (GHG):

WRAMC is in compliance with the GHG reporting requirements, and due to the reduced emissions of equivalent carbon dioxide (CO_2) since installation closure, WRAMC will no longer be required to submit this report after 2013.

Generators

Since the 2010 ECP, WRAMC decommissioned six 1625 kW emergency generators. The DDOE was informed of the decommissioning and will be updating the Title V permit. The generator list is as follows:

Generator	Size (kW)	Status
1 West	230	Active
2-1W	1625	Decommissioned
2-2W	1625	Decommissioned
2-3W	1625	Decommissioned
2-1E	1625	Decommissioned
2-2E	1625	Decommissioned
2-3E	1625	Decommissioned
4	300	Active
7	150	Active
12	150	Active
14	125	Active
15	450	Active
20	175	Active
32	50	Active
54 -1 (West)	600	Active
54 -2 (East)	225	Active
83	500	Active
90	135	Active
T-2	100	Active

COMPLETED CLOSURE TASKS:

Removal of Refrigerant: During the decommissioning process and equipment turn-in, WRAMC staff removes and records the refrigerant as required for the annual air emissions inventory. However, there are several locations where equipment will remain in place with the refrigerant remaining. These areas include walk-in freezers and refrigerators, package refrigerant units, AC units (portable and window), and water fountains. An inventory of known locations will be completed in FY13. These will remain in place and will be transferred with the property.

C. STORAGE TANKS

CORRECTIONS TO 2006 ECP and 2010 Update:

Figure 6 from the 2006 ECP lists a former heating oil underground storage tank (UST) in Building 18. This is incorrect. There was not a UST in Building 18. Also, on page 12 of the 2006 ECP, the chart indicates that there was a leaking underground storage tank (LUST) case at Building 18. This is incorrect as well. CEO staff researched the UST database and the address of the LUST is the Walter Reed Apartments. This building is not associated with WRAMC or located on post.

UPDATED INFORMATION:

All USTs and aboveground storage tanks (ASTs) on WRAMC are doubled-walled, except the two 400,000-gallon USTs which are single-walled. Since the 2010 ECP update, one temporary 500-gallon AST was removed from Building 14. The AST was used for a construction project and was removed at the completion of the project.

Six 275-gallon day tanks listed below are associated with portable generators. The generators will be removed with their associated day tanks from site in FY13 for reuse. Additionally, the associated 20,000-gallon UST and the 100-gallon return tank will be removed in FY13.

The table below lists an updated inventory of all USTs and ASTs on site. The tanks listed below with an asterisk (*) next to it will be removed in FY13.

Tank (building/descriptor)	Fuel	Size (gallons)	Type
1W	Diesel	280	AST
2*	Diesel	20,000	UST
2 (return tank)*	Diesel	100	AST
2-1E (day tank)*	Diesel	275	AST
2-2E (day tank)*	Diesel	275	AST
2-3E (day tank)*	Diesel	275	AST
2-1W (day tank)*	Diesel	275	AST
2-2W (day tank)*	Diesel	275	AST
2-3W (day tank)*	Diesel	275	AST
4 (day tank)	Diesel	100	AST
4	Diesel	3,000	UST
7	Diesel	200	AST
12	Diesel	200	AST
14	Diesel	240	AST
15 (day tank)	Diesel	100	AST
15	Diesel	280	AST
16 (fueling)	Gas	500	AST
16 (fueling)	Diesel	500	AST
20	Diesel	200	AST
32	Diesel	84	AST
54	Diesel	4,700	AST
54 East	Diesel	2,500	UST

54 West	Diesel	6,000	UST
83	Diesel	2,000	AST
400 K- Tank 1	#2 Fuel Oil	400,000	UST
400 K - Tank 2	#2 Fuel Oil	400,000	UST
90	Diesel	280	AST
T-2	Diesel	125	AST

Supplemental Environmental Project

WRAMC entered into a Consent Agreement, Docket No. RCRA-03-2002-0123, with the EPA in April 2002 which required payment of a civil penalty and installation of a SEP to monitor tanks at the WRAMC Main Post in the District of Columbia and the Forest Glen Annex in Maryland. The Forest Glen Annex was transferred to Fort Detrick in 2009. WRAMC completed the installation of the central monitoring system (CMS) at both Forest Glen and Main Post in January 2003. The system was to operate for not less than 10 years after installation. In February 2013, WRAMC requested a letter of remittance and closure of the consent agreement. WRAMC will continue to comply with applicable UST and AST regulations.

CLOSURE TASKS:

Building T-2 AST: A 100-gallon day tank that was associated with a generator will be drained of its diesel fuel in FY13, but the tank will remain in place. The generator was removed prior to the base closure in September 2011.

Building 83, AST: The generator associated with the 2,000 gallon AST will be winterized in FY13. The AST will be drained to prevent any potential leaks or spills.

Building 1, Tank Vapor Monitoring Well: A 500-gallon UST was removed from the south side of Bldg 1 in 1997. The tank was used to store kerosene for a generator. The tank vapor monitoring well was not abandoned properly. This will be completed FY13.

D. HAZARDOUS SUBSTANCES

UPDATED INFORMATION:

Post closure collection, consolidation, and removal/disposal of excess hazardous substances were completed in September 2012 with the vacating of the hospital. The vast majority of hazardous substances remaining on-site are used for: maintenance of mechanical equipment; touch-up painting; and operation of the boiler plant, chiller plants and cooling towers. Unusable chemicals have been removed from utility spaces, and consolidated in Building 92 for disposal. The current storage locations of hazardous substances are: Building 15 (shop area and boiler chemical feed), Building 48 (chiller and cooling tower chemical feed, refrigerants), Building 49 (chiller and cooling tower chemical feed), Building 54 (cooling

tower chemicals), Building 20 (cooling tower chemicals) and Building 82 (propane cylinders). All chemicals are stored in accordance with applicable regulations.

Building 54, Brine tank and Chemicals: These chemicals and brine tank were part of an animal water treatment system while WRAMC was operational. The system is no longer serviceable, but the brine tank remains in the mechanical space above room N6000. The chemicals for this system will be removed in FY13.

COMPLETED CLOSURE TASKS:

Buildings 2 and 7 –External Oxygen and Nitrogen Tanks and Internal Line Purge – On February 16, 2012, the Army conducted a system purge of the oxygen and nitrogen tanks located on the exterior of the hospital building. Building 2 and 7's interior oxygen and nitrogen distribution piping was purged using compressed air in January 2012.

Building 54 – Cooling Tower Chemicals – Building 54 has 3 (one 100-gallon and two 75 - gallon) tanks containing cooling tower operation chemicals. These tanks are double-walled plastic. The chemicals will be removed in FY13.

Buildings 2, 7 and 54 –Azide compounds – Sodium Azide is a common chemical preservative found in medical diagnostic products and used in automatic blood cell counters. The presence of azide compounds, not solely sodium azide, may remain in piping within Building's 2, 7, and 54. These are shock sensitive compounds, and may exist in metal sink traps. Sodium azide reacts with copper, lead, brass or solder in the plumbing system to form lead and/or copper azide, known explosive hazards. None of the plumbing systems were sampled for azide compounds. It is recommended, that before any demolition project, extensive renovation and/or removal of piping is scheduled, the future owner(s) should remove the metal sink traps, test and dispose of the traps appropriately. See each Building's Phase II in Appendices S-4, S-5, S-6 for additional information.

Hydraulic Systems

Elevators: As buildings are decommissioned, the hydraulic elevators will be decommissioned. The elevators will be either permanently or temporarily closed. Those that are permanently closed, will have the hydraulic fluid drained to prevent potential leaking**.** The table below lists the buildings and location of hydraulic elevators.

Building	Location
3	East
3	West
4	Center section
6	Main Lobby
6	Main Lobby

11	West Side
11	East Side
14	Main Lobby
18	Main Lobby
20	Main Lobby
20	Main Lobby
20	NW Corner
T20	Main Lobby
32	NW Corner
38	Main Lobby
41	Main Lobby
52	NE Corner
54	South End
83	South End
91	Main Lobby

Compactors and Lifts: Other equipment that contains hydraulic fluid include: lifts, garbage compactor tanks, and mini-elevators. This equipment will not be drained of their hydraulic fluid. The following is a list of buildings with various equipment containing hydraulic fluids: An inventory of known locations is below.

Building 2: 2M Mini-elevators
Building 2: Pharmacy Mini-elevators
Building 7: Outdoor Handicap lift
Building 14: Garbage compactor
Building 20: Indoor lift in lobby
Building 53: Outdoor Equipment lift
Building 54: Equipment lift on G-level

E. RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) / HAZARDOUS WASTE (HW)

UPDATED INFORMATION:

WRAMC operates a RCRA HW program under EPA ID No. DC4210021156. In July 2012, WRAMC changed its operational status from "large" to "small" quantity generator with DDOE (Appendix E-1). The change was due to the significant reduction in HW generation following base closure and initial post-closure clearing of wastes from site facilities.

In July 2012, the 90-day HW storage area, "HW Bunker", was moved from Building 54 to Building 92, in anticipation of the transfer of Building 54 to the Department of State (DOS). WRAMC also maintains two non-regulated waste storage areas: Building 15 (boiler chemical

storage room) and Building 2 (former hospital central material sterilization) under its RCRA HW program.

The RCRA Hazardous Waste Biennial report submitted in July 2012 is in Appendix E-2.

CLOSURE TASKS:

Vile Eater (Building 2, 9 ½ Floor) – WRAMC was a "center of excellence" for Thin-Prep testing and therefore received samples from a large geographic area. To process the large number of Thin-Prep sample containers, the hospital purchased the "Vile Eater". This system crushed the plastic sample containers, destroyed confidential patient information and collected the alcohol for disposal as a hazardous waste through the WRAMC bunker. This system will be removed in FY13 for reuse.

Solvent Recycling Center (Building 54, Armed Forces Institute of Pathology (AFIP) Bunker) – AFIP operated a solvent recycling center in their hazardous waste storage bunker area. The center had 4 stills that were used to clean-up alcohol, formalin, and xylene for reuse in the laboratories. The still bottoms were handled and disposed of as hazardous waste. The stills were removed.

Uninterrupted Power Supply (UPS) System: Several UPS Systems still remain at WRAMC. They typically contain lead acid batteries, which are considered a hazardous substance. If they are not removed to be reused, they will remain in place. An inventory will be completed in FY13.

F. SANITARY SEWER AND WASTEWATER - DC WATER AND SEWER AUTHORITY (WASA) PERMIT

UPDATED INFORMATION:

WRAMC was authorized to discharge industrial and domestic wastewater to the DC WATER (formerly known as DC WASA) sanitary sewer by Permit No, 045-7. DC WATER conducted a pretreatment close-out inspection on July 22, 2011 and found the installation to be incompliance with the permit. Based on the inspection and the base closure on September 15, 2011, DC WATER granted WRAMC's request to terminate the permit (Appendix F-1).

WRAMC requested and was granted a variance (increase) in the DC WATER maximum wastewater pH requirement from 10 to 12.5 for boiler blowdown (Appendix F-2).

Wastewater Mercury Contamination Study (Buildings 2 and 54) – In 2010, an extensive study was completed by the U.S Army Public Health Command (PHC) to determine the source of mercury in the wastewater stream. The mercury was caused by personnel inadvertently pouring a mercury containing compound to the sanitary sewer. (Appendix F-3)

Prevention of Sewer Gas Release in Decommissioned Buildings (Building 18, 88 and T-20) and Temporarily Decommissioned Buildings (Building 52 and 53)– Building 52 and 53 are temporarily decommissioned due to pending steam line repairs. As activities decreased in these buildings, the potential of sewer gas release from dry sanitary sewer p-traps increases. To prevent p-trap drying in buildings with active utilities, water is placed in the traps by flushing a toilette and running water in sinks during scheduled building inspections. For buildings that have had utilities shut-off and water lines drained, the traps are filled with antifreeze to prevent evaporation and drying. The placement of this material was approved by DC Water, by email dated October 12, 2012. Currently, all above listed buildings have had the traps filled with antifreeze, except for Building 18. Building 18 will be completed in FY13.

PRETREATMENT SYSTEMS – Various types of wastewater pretreatment systems were utilized at WRAMC. See below for their status and descriptions.

Grease Traps (Buildings 1, 2 and 20) - Four grease traps removed cooking grease from the wastewater before it entered the sanitary sewer. They were located at Building 20, Building 1 (under the former Burger King), and Building 2 (back loading dock and in the interstitial floor below the cafeteria). All grease traps, except the one in the interstitial, were cleaned following cessation of food preparation in September 2011. The interstitial grease trap has been in place for years and was never cleaned out. It did not receive greasy wastewater.

Oil/Water Separators (Buildings 2, 82 and 400K Tank Vault) - There are three oil/water separators on post. The oil/water separator at Building 82 (former auto-skills shop) was originally installed to pretreat wastewater from a proposed car wash. The car wash concept was never implemented. After all car maintenance activities were terminated, the sediment tank and the separator with associated side storage tank were cleaned on August 3, 2011. The bay drains and sediment tank portion of the system were sealed. The second separator is located on the 9 ½ floor of Building 2, and was used to remove hydraulic oil that leaked from garbage compactors to the floor drains. The compactors and hydraulic tanks were removed. The separator was inspected on April 10, 2013 and found to have no residual oil. The third separator is a cylindrical shaped unit, located in the vault associated with the 400,000-gallon USTs. This separator was used to remove oil from tank dewatering and was disconnected and abandoned in place. The oil contained with the abandoned separator will be removed in FY13.

Sediment Traps (Building 2) - Three areas of the hospital had portable (5-gallons container) sediment traps located under sinks: 1D (dental), 3H (prosthetics) and 5A (cast labs). A total of 13 traps were removed and the sediment characterized for disposal by toxic chemical leaching procedure (TCLP) on September 3, 2012. The waste was non-hazardous. The connections to the sanitary sewer were plugged after the traps were removed.

Silver Recovery Systems for Wet Chemistry Film/X-ray Developers (Buildings 2 and 54) – During full operation, there were as many as seven systems in the hospital and 10 systems in AFIP, that developed film and x-rays using wet chemistry. By facility closure, in September 2011, all systems, except one, had been converted from wet chemistry film development to digital film processing. The six wet chemistry film developers and silver recovery systems were removed from the buildings prior to base closure. There is one remaining wet chemistry developer in Building 2 in Room 1H18. The chemicals were drained from the machine by WRAMC personnel, and appropriately disposed of.

Kill Tanks (Building 54) - The former AFIP building has three stainless steel "kill tanks" in the basement. These tanks were used to disinfect wastewater from biological safety levels (BSL)-3 labs and certain animal testing rooms. Disinfection was accomplished using steam and pressure. Two older "kill tanks" were removed in December 2011 (Appendix F-4).

Amalgam Traps (Building 2) – The dental chairs in the 1D corridor (former dental area) had built-in amalgam traps (fine screens) to collect parts of fillings. The trapped fillings were removed by dental technicians weekly and the material turned in for recycling. All dental chairs and associated traps have been removed from the area.

G. STORM SEWER AND WASTEWATER - NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT

UPDATED INFORMATION:

The 2006 ECP stated that non-contact cooling water was discharged from the hospital (Building 2) into the storm sewer at estimated flow of 20,000 to 30,000 gallons per day. The EPA issued a National Pollution Discharge Elimination System (NPDES) Permit, DC0000361, for this discharge, effective 1 August 2008.

In accordance with the permit, WRAMC obtains quarterly and semi-annual samples from storm sewer manholes 166 and 167 and analyzes the samples for parameters including total residual chlorine (TRC).

The following table identifies permit limit exceedances since 2010 of the < 0.10 mg/L TRC levels along with the contaminant sources.

Period	Value (mg/L)	Source
1st quarter 2010	0.17	Overflow from a cooling tower at AFIP that discharged into a storm sewer.
2nd quarter 2010	1.2	Discharging hoses attached to hot water valves that were connected to storm sewer lines on the 4 ½ floor of the hospital.
3rd quarter 2010	0.10	Leaking water line.

3rd quarter 2011	0.30	Broken coil in an air handler drained to the storm sewer.
2nd quarter 2012	0.10	Occurred during DC Fire training exercises during which they discharged potable water to the storm sewer.
4th quarter 2012	0.18	Failed back flow prevention device on makeup water to a heat exchanger.

Building 54 (AFIP), Cooling Tower – Chlorine testing/surveys of the storm sewer system were conducted in January 2009 in order to determine potential chlorine sources. One of those surveys found that the cooling tower blowdown at Building 54 discharged to the storm sewer. As an interim measure, Building 54 personnel installed a surface pipe (fire hose) to divert the discharge to the sanitary sewer. Upon base closure, the cooling tower was taken out of service and the temporary line removed. Before the tower is placed back in service, the discharge would have to be permanently connected to the sanitary sewer or permitted under the NPDES program.

Storm Water Treatment/Retention Systems (Buildings 2A and 6) – The site has two storm water treatment/retention systems that were installed at newly constructed buildings (2A and 6). Historically, the systems were cleaned annually.

H. DRINKING WATER

UPDATED INFORMATION:

The only provision of the Safe Drinking Water Act (SDWA) applicable to the Former WRAMC is associated with the Cross Connection Control Program. Under this program, known backflow prevention devices (BFPDs) are tested annually and repaired as required. Due to the number of devices, the testing is phased over a year and reports filed with DC Water semi-annually.

BFPDs in Decommissioned Buildings (Buildings 18, 88 and T-20) and Temporarily Decommissioned Buildings (Building 52 and 53)– Building 52 and 53 are temporarily decommissioned due to pending steam line repairs. - As part of the decommissioning process, decisions have to be made as to whether it is necessary to test or remove known BFPDs following line draining. Pending a final decision, the devices located on drained lines are being left in place and not tested. An inventory of known locations will be completed in FY13.

Animal Drinking Water Treatment System (Building 54) – The laboratory animals required specially treated drinking water composed of a reverse osmosis, chlorination and acidification processes. The system is located in Room S5308 and has two 10-gallon plastic

feed tanks (sulfuric acid and chlorox). The tanks will be disconnected and the liquids removed and disposed of properly in FY13.

Water Treatment Canisters/Cylinders (Throughout the Post) – Locations throughout the facility, have water pretreatment canisters/cylinders with media to soften or otherwise condition/clean water for downstream uses. These locations include dining facilities, dental offices, etc. These canisters/cylinders will be left in place. An inventory of known locations will be completed in FY13.

Old Water Tank, Building 54: There is a large water tank that was associated with the Old "kill tanks". After the water left the "kill tanks", it went through a non-contact cooling process. This tank apparently held the cooling water until it was discharged into the sanitary system. To prevent future use, a large hole was cut into the side of the tank.

I. POLYCHLORINATED BIPHENYLS (PCB)

Recent clean-up activities:

Building 2 (hospital), Transformer Rooms – The three transformer rooms in the basement of the hospital were inspected in June 2011. Each room contains four transformers. During the inspection, leaking transformers were noted, several of which generated stains on the concrete floors. Wipe sampling and analysis of the leaks and floor stains were conducted. The leak areas on the transformers did not have detectable PCB concentrations, but the floor staining had PCB concentrations above the action level of 100 µg/100cm^2.

The leaks were fixed. The generators and floors were cleaned in November 2012. The floors were stripped of the existing paint to the degree practicable and prepped for painting. Prior to the sealing of the floor with a double layer of epoxy paint, floor wipe samples were collected in the previously contaminated areas. All post-cleaning samples were found not to contain detectable PCBs (See Appendix I-1).

Building 40, Exterior Transformer Pads – The east side of Building 40 has two concrete pads (north and south) containing a total of seven transformers. The southern pad has three transformers and a recessed electrical vault. The vault is a manhole with an earthen bottom. All existing transformers were non-PCB as they were manufactured and installed after 1985.

The oil staining on both pads were noted during a transformer inspection in September 2012. Black staining also exists along the sides of the electrical vault and on the vault bottom. Vegetative impacts were noted along the edge of the northern pad. Wipe samples were collected from the stained concrete areas and analyzed for PCBs. All PCB wipe results were

above the action level of 100 ug/100 cm^2. Soil samples were collected along the edge of both pads and the bottom of the electrical vault and analyzed for PCBs. All but one soil sample were above the action level of 25 ppm PCBs. These locations are to be cleaned, or excavated to the degree practicable, to meet regulatory limits in FY13.

The oil in each of these transformers was sampled on October 19, 2012. The PCB concentration was non-detect for all samples, and the oil was removed on November 9, 2012.

UPDATED INFORMATION:

Building 40, Transformer Vault (Site ID: 6(5)HS/HR) – WRAMC remediated the PCB contaminated soil around the two adjacent transformer vaults north of Building 40 in January 2007. The PCB target soil clean-up level of 25 parts per million (ppm) was achieved, and PCB remediation was completed. In June 2010, PHC installed three monitoring wells near the transformer pads to determine if there was any groundwater contamination associated with the transformer vaults. The wells underwent 3 sampling events. The results of the study showed that there was no PCB contamination in the groundwater. The results are contained in Appendix I-2. In April 2012, the wells were appropriately abandoned. A well closure report, including D.C. well abandonment forms, was submitted to DDOE on May 11, 2012 (Appendix I-3).

RECENT POLYCHLORINATED BIPHENYL (PCB) SAMPLING OF IN GROUND TRANSFORMER VAULTS

Building 88, Transformer Vault – On March 8, 2012, approximately 2 inches of oil was noted in the transformer vault adjacent to Building 88. The oil was sampled for PCBs on March 10. The PCB results were below detection (March 14). The transformer was taken out of service, and the vault was drained.

Building 6, Transformer Vault – On May 25, 2012, about a quarter of an inch of brownish oil was noted in the transformer vault. This transformer had been out of service for quite a period of time before this discovery. The vault was pumped down and power washed on September 5. The water from the vault was tested, and contained no PCBs. The transformer oil was drained in September 2012, and disposed of through the HW bunker.

Building 11, Elevator – On March 21, 2011, an elevator problem was noted on the east side of Building 11. There was a hydraulic leak inside the cylinder that operates the elevator piston. This cylinder is approximately 30 feet in length and located in a shaft below the elevator floor. The system was installed in the late 1970s. On April 26, 2011, a soil sample

was collected from the bottom of the shaft and two wipe samples were collected from the inside and outside of the shaft and analyzed for PCBs. The results for all samples were below detection limits. During the process for cleaning up and waste characterization, the shafts were tested for PCBs with the finding of non-detect. The debris was cleared from the shaft from 25 to 40 feet deep removing 350 gallons of debris with an estimated 80 to 100 gallons of oil. A spill report was emailed to DDOE on May 20, 2011 (Appendix I-4). The final sediment sample (TPH-DRO), representing residual material at the bottom of the casing, was collected from the large hose used to clean out the casing. The samples result (21,000 mg/Kg DRO) was emailed to DDOE on June 16, 2011. The physical structure of the elevator shaft precludes any further cleanup of the soil.

TESTING:

The following list describes recent testing of water in transformer vaults. If the results are non-detect for PCB's, then any storm water or ground water that collects inside the vault is pumped onto the ground. If PCBs are detected, the water is removed, and disposed of offsite appropriately.

Building 31: Non-detect: Tested in December 2010.
Building 11 NE Corner: Non-detect: Tested in October 2011
Building 40 West Vault: PCBs detected: Tested in October 2011
Building 40 East Vault: PCBs detected: Tested in October 2011
Building 38 (NE Corner): Non-detect: Tested in June 2012
Building 6 (NE Corner): Non-detect: Tested in June 2012
Building 15 (east side): Non-detect: Tested in August 2012
Building 1 (West vault, front of Building): Non-detect: Tested in August 2012
Building 1 (East Vault, Front of Building): PCBs detected: Tested in August 2012.

Transformer Vault/ Pad Testing Report: In December 2005 and January 2006, transformer areas (3 pads and 16 vaults) were sampled for PCB contamination. Dry areas were wipe sampled. For any standing liquids, surface and sub-surface water samples were collected. The table below has a summary of the maximum concentrations measured for each transformer location, as contained in EA's final report (Appendix I-5). Five transformer areas (Buildings T-2, 7, 11, 14 and 15) were found to be non-detect or below lowest regulatory limits (10 ug/100 cm^2) for PCBs. With the exception of the dry Building 1 vault (168 ug/100 cm^2), all other areas measured using wipe samples were between 10 and 100 ug/100 cm^2 (Buildings. 12, 17, 40 (NW), 40 (SW), 57 and 88). With the exception of Building 11, noted above, the water samples yielded detectable PCBs (Buildings. 1 (wet), 1/2, 38, 40, 41, 52/53, and 91/83). Subsequent to the survey, the following transformers have been drained, taken out of service and/or remediated: Buildings 40 (NW), 40 (SW), and 88. The two Building 40 vaults have undergone contaminated soil excavation, groundwater monitoring (no issues) and been cleaned (power washed).

			Wipe Samples		Water Samples	
Closest Bldg	**Survey Transformer ID**	**Vault/ Pad**	**# of samples**	**Max, ug/100 cm^2**	**# of samples**	**Max, ug/L**
1	TF 3	Vault	5	168	-----	-----
1	TF 4	Vault	-----	-----	2	2.6
1/2	TF 14	Vault	-----	-----	2	1.2
T-2	TF 17	Vault	4	< 2	-----	-----
7	TF 19	Vault	4	6	-----	-----
11	TF 7	Vault	-----	-----	2	< 1.0
12	TF 2	Vault	4	27.8	-----	-----
14	TF 18	Vault	5	< 2	-----	-----
15	TF 1	Pad	4	< 2	-----	-----
17	TF 6	Vault	4	46.6	-----	-----
38	TF 20	Vault	-----	-----	2	4.3
40	TF 8	Vault	-----	-----	0	-----
40	TF 9	Vault	-----	-----	2	125
40 (NW)	TF 15	Pad	6	59.7	-----	-----
40 (SW)	TF 16	Pad	5	74.4	-----	-----
41	TF 11	Vault	-----	-----	2	1.3
52/53	TF 12	Vault	-----		2	5
57	TF 10	Vault	5	87.9	-----	
88	TF 13	Vault	5	12.4	-----	-----
91/83	TF 5	Vault	-----	-----	2	1.7

J. ASBESTOS CONTAINING MATERIALS (ACM)

UPDATED INFORMATION:

WRAMC is currently conducting a reinspection of all buildings constructed before 1990. This will be completed in FY13. In 2009 and 2010, WRAMC completed an asbestos survey/re-inspection of 38 of the buildings on WRAMC, including the steam tunnel. Sixteen buildings were not inspected during this survey because they were built or completely renovated after 12 July 1989, when the EPA issued its final rule banning most asbestos-containing products.

The following list includes the known areas with damaged, but not friable ACM. These areas are sealed to prevent further damage.

Building 1:
Room A007, Approximately 800 square feet (S.F.) of 9”x9” floor tile and mastic
E-wing, first floor storage area: Approximately 81 S.F. of 9”x9” floor tile and mastic
2nd floor D-wing stairwell: Approximately 40 S.F. of 9”x9” floor tile and mastic

Building 17:
Main floor hallway and rooms 171 and 172: Approximately 550 S.F. of 9”x9” floor tile and mastic

Building 54:
Museum level: Approximately 500 S.F. of 9”x 9” floor tile and mastic.
Fume Hood in room Room G035: The hood consists of ACM containing tiles. These were not abated.

Recent Abatement activities:

Building 1, B-wing attic and C-wing attic: In February 2013, approximately 150 linear feet of damaged ACM was abated from the B-wing attic. The pipes were not reinsulated. Also, in the C-wing attic, an expansion tank with ACM insulation was removed.

Building 1, D-wing pipe insulation: In January 2013, approximately 15 linear feet was abated to repair a leaking steam pipe.

Building 1 Window Project: See project listing in Section L, Lead and Lead based Paint. The glazing on the windows is ACM. The glazing is collected with the paint chips, and disposed of appropriately.

Building 1, Rooms C118a, C123/C015: In March 2013, approximately 60 linear feet of pipe insulation and fittings were abated due to pipe leaks.

Building 54, Room M090: Fume Hood: In July 2012, ACM containing panels were removed from a fume hood.

K. LEAD AND LEAD BASED PAINT

WRAMC continues to maintain compliance with applicable lead-based paint (LBP) regulations. Since the 2006 ECP WRAMC has had LBP removed from some window and exterior components of Buildings 1, 11, and 41.

Building 1 (historic building), Window Project – To protect Building 1 from significant degradation, a phased project was initiated in 2012 to prep, re-glaze and paint certain wood areas of the building, primarily windows. The existing window paint was tested using a field screening kit and found to be LBP. The window prep includes lightly scraping to remove loose paint chips. A tarp is placed on the ground under the active work sites to collect the

chips. An independent third party is overseeing the project to ensure that the LBP chips are collected and not contaminating the soil. All wastes generated are handled as lead waste and manifested off-site for appropriate disposal.

Building 2 - Lead Room (Room # 1H09) – To establish appropriate decommissioning of the hospital, a phased inspection, testing and remediation of contaminated areas were conducted. As part of the review process, the Lead Room was identified as having significant lead contamination. This room was used to fabricate lead shielding for patients undergoing radiation treatment. A contract was issued and completed to remove lead contaminated equipment and clean and seal areas left in place (See Appendix K-1). It should be noted that the floor in this room should cleaned or waxed with abrasive equipment (buffer) to protect the seal.

Building 54 - Firing Range (Room B030) – Room B030 in Building 54 was used as an indoor firing range. The area was fully abated in September 2011. See Appendix F-4.

Building 2, 7 and 54 - Lead Wall Shielding: An inventory was conducted to disclose where the majority of the lead walls are, and other lead equipment remains. An inventory of known locations will be completed in FY13. Future building owners need be aware that when renovations are being completed to these areas, that they handle and dispose of the lead properly.

Building 54 – Exterior Gun Unloading Drum – There is a gun unloading drum on the southeast exterior corner of Building 54. The drum will be sealed in FY13, and is assumed to contain lead dust. This drum will remain in place.

O. PESTICIDES

UPDATED INFORMATION:

Since closure in 2011, WRAMC no longer mixes chemicals on site, and therefore no longer has an integrated pest management plan. WRAMC's pest management is contracted to commercial pest management.

P. SOLID WASTE

UPDATED INFORMATION:
Solid waste production has significantly reduced since base closure. The solid waste contractor currently has an 8-yard and a 30-yard container on site, compared to approximately 10 dumpsters at closure. The largest volume of waste currently generated is associated with rug and drywall removal to prevent mold formation following the accidental

water line ruptures during the winter months in various buildings. There have been no solid waste regulatory issues since closure.

Solid Waste Notice of Infraction (NOI) (Building 18) - The District of Columbia Department of Public Works and Transportation issued an NOI to WRAMC in February 2007 for improper disposal of solid waste dumped behind Building 18. This building is located off-site of WRAMC Main Post, across Georgia Avenue. Members of the public may have discarded the solid waste items near the dumpster. WRAMC removed the waste. To prevent a reoccurrence, WRAMC removed the dumpster, posted a sign prohibiting dumping, and instituted a monthly monitoring program.

Completed Closure Tasks:

Trash Chute Cleaning (Buildings 2 and 14) – Buildings 2 and 14 have trash chutes that convey solid waste in the building to central locations. Building 14 has two chute systems and central collection points. WRAMC contracted to clean the chutes and receiving areas in Building 14 which was completed on April 26, 2012. As Building 2 is slated for demolition, the chute systems were not cleaned.

Q. RADIOLOGICAL MATERIALS, NUCLEAR REGULATORY COMMISSION (NRC) LICENSE:

Several Radiological materials were used for research and treatment while WRAMC was an active hospital, and operated under a NRC License. In 2006, a Historical Site Assessment (HSA) was completed to identify the areas that had used radiological materials in the past, or potentially impacted. See Appendix Q-1. The HSA identified 8 buildings, and one area that were potentially impacted. They are Buildings 1, 2, 7, 38, 41, 54, 91, 92 and the radiological bunker adjacent to Building 20. In December 2011, a Comprehensive and Characterization site survey was completed (Appendix Q-2.) Also in December of 2011, the final Status survey report was completed (Appendix Q-3.) The NRC released all buildings and area for unrestricted use in June 2012 (Appendix Q-4.)

Prior to closure, Buildings T-2 (Appendix Q-5) and 40 (Appendix Q-6) were released for unrestricted use.

R. BIOLOGICAL DECONTAMINATION/GENERAL DECONTAMINATION

Since base closure, WRAMC has completed several projects to eliminate the potential for biological hazards. The following describes those activities.

Building 2, Rooms 3H13a-j and 3H04 - (General Cleaning): The mission in these rooms generated large amounts of plaster and fiber dust. Samples of the dust were collected, and tested for TCLP metals and Total metals by EPA methods. The results of the analyses indicated barium, chromium,

lead and cadmium in the residual dust. The residual dust was cleaned from all surfaces in the subject rooms.

Building 2, (Room 2M01) - **Former Morgue Decontamination:** In July 2012, the former morgue's refrigerators were decontaminated using an anti-microbial solution. The decontamination included wiping down the unit, and scrubbing the areas with a light build-up of debris, and using a vacuum to collect any residual dust. See Appendix R-1. The refrigerators will be removed from the building in April 2013.

Building 2, (Rooms 2B54 - 58) - **BSL-3 Decontamination:** In July 2012, the BSL-3 labs, were decontaminated with Vaporized Hydrogen Peroxide. See Appendix R-2.

Building 54, (Rooms N4204, S5311, N5409) - **BSL-3 Decontamination:** In 2011, the BSL-3 labs were decontaminated with Vaporized Hydrogen Peroxide. See Appendix K-4.

Buildings 1, 2, 2A, 7, 54 - Fume hood and BioSafety Cabinet (BSC) Decontamination: During Building closure, all known hoods and BSCs were decontaminated with either a solution of sodium hypochlorite, chloride dioxide, or Spectra 34. Appendix R-3 lists the locations of the hoods and BSCs. Also during the decontamination process, all HEPA filters were removed and discarded as Regulated Medical Waste (RMW).

Buildings 2, 2a, 7 and 54 – Various Equipment Decontamination – Various equipment which remained in-place required verification of decontamination. In August of 2012, the list in Appendix R-4 was decontaminated and disinfected with a solution of Spectra 34. (See Appendix R-4 for locations and certifications.)

S. ENVIRONMENTAL PHASE I, II, III AND IV

To ensure that the all potential chemical and biological concerns are addressed in lab buildings, WRAMC conducted an Environmental Phase I and II for Buildings 2, 2a, 5, 7, and 54. The Environmental Review Phase I was completed in 2011 and identified potential contaminants of concern (PCOC), and provided recommendations on how to reduce the potential hazards and decontaminate the areas. The Environmental Review Phase II analyzed the Buildings for the specific PCOCs identified in Phase I. The PCOCs identified were: perchlorates and picrates in chemical fume hoods and BSCs; azides; mercury; volatiles; semi-volatiles; RCRA 8 metals; cyanide; and biohazards.

During the Environmental Phase II, over 700 (Bldg 2,2a,5 - 497; Bldg 7 - 29; Bldg 54 – 192) spaces were tested for the specific PCOCs in July 2012. Out of those, only 14 spaces had PCOC results that were above an acceptable limit. See Appendices S-1, S-2, S-3, S-4, S-5, S-6 for the Phase I and II reports.

Under the Environmental Phase III, rooms identified in the Phase II which were above acceptable limits or required additional documentation, will be cleaned in 2013. These

rooms include recleaning of BSL-2 labs, as well as the 14 spaces. The Environmental Phase IV will re-analyzes the areas for clearance. The Phase III and IV are projected to be completed in FY13.

T. NATIONAL HISTORIC PRESERVATION ACT COMPLIANCE

To comply with the National Historic Preservation Act, a Section 106 study was completed. The results of the study resulted in a Programmatic Agreement between the Army, District of Columbia State Historic Preservation Office, and the Advisory Council to Historic Preservation (ACHP) in January 2013 (See Appendix T-1). This agreement states that the Army will provide interim maintenance, by maintaining weather tight conditions; physical and fire protection; and prevent building deterioration. The Army will submit a nomination to the National Register of Historic Places, assess the effects of reuse plans, provide photographic documentation, and will perform archaeological studies.

U. RECOGNIZED ENVIRONMENTAL CONCERNS (RECs) IDENTIFIED IN THE 2006 ECP

UPDATED INFORMATION:

SITE ID FROM 2006 ECP: 3(2)PS/PR (Petroleum impacted soil in the area of Building 15)

WRAMC completed an Environmental Site Assessment of the area around Building 15 in 2008 that confirmed the existence of petroleum product in the soil. A Corrective Action Plan (CAP) required WRAMC to run a skimmer in the vault to collect the #6 fuel oil for one year, as well as, to conduct quarterly groundwater sampling and analysis from the associated monitoring wells. See Appendix U-1.

While gauging the monitoring wells near Building 15, WRAMC discovered free phase hydrocarbons unrelated to the #6 fuel oil previously identified at this site. As a result of a document review and site walks, an abandoned UST pipe was found. WRAMC is in the process of excavating the area to remove the pipe and the contaminated soil.

During the Building 15 site assessment, a petroleum, oil**,** and lubricants (POL) contaminated area was discovered near the area around Building 82. There were two leaking USTs that were removed in the 1980's. The leaks resulted in contaminated soil. A site investigation and risk analysis was completed in October 2012 (See Appendix U-2). These resulted in a CAP (completed in October 2012) (see Appendix U-3). The CAP requires WRAMC to install a Passive Free Phase Recovery System, as well as, conduct quarterly groundwater sampling in the associated monitoring wells.

SITE ID FROM 2006 ECP: 6(5)HS/HR (Transformer vault adjacent to Building 40)

See PCB section of this document for updated information on this site, 6(5)HS/HR.

9(2)PS/PR(P)-18(2)PS/PR(P): (Multiple former UST locations)

The list of former UST locations was established in the 2006 ECP not because information indicated contamination, but because these were limited documentation of the tank removals. The 2007 ECP Phase II Sampling Recommendations stated "there is no regulatory driver for sampling these locations prior to property transfer." for these former UST sites. No additional work is expected for these sites.