



Pepco Benning Road Site Cleanup

Summary of the Remedial Investigation & Feasibility Study (RI/FS) Work Plan

Public Comment Period: August 9, 2012 – September 28, 2012

Submit Comments By Mail: District Department of the Environment
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Pepco and the District Department of the Environment (DDOE) entered into a consent decree (legally binding settlement agreement) on December 1, 2011 requiring Pepco to conduct an investigation of potential contaminant release from their 77-acre Benning Road facility into the nearby Anacostia River. The first step (establishment of the Remedial Investigation and Feasibility Study (RI/FS) Scope of Work detailing site background information and project procedures) and second step (development and initial implementation of the Community Involvement Plan) in this process are complete. Work plans are currently available for public comment (RI/FS Work Plan, Sampling and Analysis Plan, and Health and Safety Plan). Site assessment will begin Fall 2012, once DDOE has reviewed public comments on these work plans and given final approval. **It is important that citizens file comments so that DDOE and Pepco know that people care and want to see the best cleanup possible for the health of the community.**

The RI/FS Work Plan, prepared by AECOM, describes the overall technical process of the site investigation. It is a review of the relevant existing information, data collection procedures, and Conceptual Site Model (CSM) used to help identify sources of contamination, routes of migration, and potential human and environmental risk factors.

Listed below are some highlights/areas of interest from this document:

- The study area may be adjusted based on findings during the investigation. (Pg. 2, Section 1.1)
 - The criteria/information that would call for this type of adjustment needs to be defined.

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- Soil boring on the landside (Pepco Benning Road property) and sediment sampling on the waterside (Anacostia River) will determine exactly which contaminants could be migrating to and impacting the Anacostia River. Pepco/AECOM has stated that all precautions to minimize the potential for disturbance of soil, river sediment, and water will be taken and any alterations will be restored to prior conditions. (Pg. 31 & 34, Section 5.2).
- The Pepco site, referred to as the “Landside,” has been identified as having insignificant human health risks, or exposure pathways, because access to the site is restricted by a fence around the perimeter and 24/7 security, impervious surfaces and gravel cover prevents contact with surface soil, and health and safety procedures are in place to protect employees. (Pg. 22, Section 3.1 & Appendix D, Pg. 1)
 - Even though the exposure pathways are determined to be insignificant, we still need to know what those are for employees, trespassers, and future land users. What if the site were sold and redeveloped? Why doesn’t the landside investigation seem to be taken as seriously as the waterside investigation? Risks may seem insignificant or incomplete now, but what about in the future?
- Stormwater drain outlets (Outfall 013 and Outfall 101) were identified as carrying runoff (including pollutants) from the facility to the Anacostia River. (Pg. 6, Section 2.1)
 - Outfall 013 is said to carry the majority of the runoff and is pinpointed on Figures 2, 5, 7, 10, and 11.
 - Outfall 101, however, is not pinpointed on any of those figures but needs to be because it is just as important to consider; it discharges runoff originating from transformer secondary containment basins. If Outfall 101 is not considered significant, any supporting evidence was not presented.
- The tone (Pg. 17 & 18) seems to suggest that pollution in the river has been coming from other nearby historic sources (known now as Kenilworth Park and Langston Golf Course). While the information provided is relevant and needs to be considered, Pepco also needs to ensure that their investigation remains unbiased and true to the process. Forensic analysis conducted on certain contaminants (PAHs and PCBs) will be crucial in identifying the source material and, therefore, most likely the source area.

All OTHER safety and sampling protocols, laboratory testing techniques, investigation-derived waste management procedures, data tracking methods and evaluations, human health and ecological risk assessments, procedures for identifying potential remedial actions, and final reports will be followed using the best methods possible based on the geographic location, site conditions, relevant laws and regulations, and other various factors taken into consideration for this site investigation. DDOE will be involved in field investigation activities to ensure compliance.

Stay tuned to these websites for updated information as this cleanup moves forward:

AWS – <http://www.anacostiaaws.org/programs/advocacy/toxics>

DDOE – <http://ddoe.dc.gov/page/pepco-benning-road-facility-plans-and-deliverables>

Pepco – <http://www.benningservicecenter.com/>