

Washington Gas East Station Site Frequently Asked Questions

The National Park Service (“NPS”) maintains a website for the Washington Gas – East Station Site at <http://www.nps.gov/nace/parkmgmt/washingtongas.htm>. The “Site Documents” webpage includes links to investigation-related documents, the Consent Decree, community fact sheets, and announcements.

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Background Questions

Where is the Site? What is the difference between the Washington Gas property and the government property?

The “Site,” also referred to as the “government property,” is in Southeast, Washington, DC, east of the I-695 and 11th Street Bridges, and mostly south of Water Street, SE. The government property is located between the Washington Gas East Station Site (which is on the north side of Water Street, SE) and the bank of the Anacostia River. The government property was previously managed by the National Park Service (NPS) as part of the Anacostia Park. In 2008, all of the government property, except the U.S. Army Corps of Engineers debris dredging facility, was transferred to the District of Columbia. The CERCLA¹ investigation and cleanup is occurring at the government property, which is affected by industrial waste related to coal tar from the Washington Gas East Station property across Water Street, SE.

The Washington Gas East Station Site is on the north side of Water Street, SE. Washington Gas Light Company (“Washington Gas”) made gas from coal for lighting and heat there between 1888 and the mid-1980s. The Washington Gas East Station Site currently hosts a two-story building used for treating contaminated groundwater, a closed natural gas fueling station, and two office buildings known as Maritime Plaza, which were built between 2001 and 2003. Washington Gas has performed voluntary cleanup actions at the East Station Site under U.S. Environmental Protection Agency oversight.

A map showing the two properties is included in the Community Involvement Plan and on the Washington Gas – East Station Site website:

<http://www.nps.gov/nace/parkmgmt/washingtongas.htm>

Why are environmental inspections and cleanup being performed at the Site?

Environmental sampling has shown that contaminants from historical coal gas manufacturing at Washington Gas East Station Site are present on the government property and may be moving towards the Anacostia River. The government property is contaminated with industrial waste containing polycyclic aromatic hydrocarbons (PAHs); volatile organic compounds (VOCs), especially benzene; cyanide; and heavy metals. NPS and the District are overseeing Washington Gas's investigation and cleanup actions at the Site through a CERCLA Consent Decree¹ (a legally enforceable settlement agreement).

Who is involved in the investigation and cleanup?

These three groups are working together under a legal settlement agreement called a Consent Decree:

- The National Park Service (NPS): NPS, which is a bureau within the Department of the Interior (DOI), is the lead agency with authority to select and oversee the investigation and cleanup at the Site.
- The Department of Energy & Environment (DOEE) (formerly known as District Department of the Environment (DDOE)): DOEE represents the District of Columbia and is working as a support agency with NPS to oversee the Washington Gas work.

Washington Gas Light Company: Washington Gas will pay for and perform the investigation and clean up at the Site. Washington Gas will clean up contaminated soil at and near the ground surface and investigate contaminated groundwater and Anacostia River sediments. **How will NPS and DOEE work together?**

NPS, as the lead agency, and DOEE, as the support agency, communicate openly and work together as oversight partners. In doing so, NPS and DDOE:

- attend meetings and inspect the work performed by Washington Gas,
- review and approve planning documents and reports,
- have legal teams to interpret the terms of the Consent Decree, and
- represent the public interest to restore and maintain a safe and healthy environment.

What contaminants are present and being addressed at the Site?

The investigation and cleanup at the Site is focusing on contamination that resulted from the waste used or created during gas manufacturing including coal tar, purifier box waste, wood chips, cinders, clinkers, ash, and building materials. Coal tar can move through soil and groundwater in different forms.

¹ On September 26, 2012, the Consent Decree was entered by the United States District Court for the District of Columbia.

The primary contaminants of concern for human and ecological risk at the Site are: polycyclic aromatic hydrocarbons, or PAHs, as well as volatile organic compounds (including benzene), and toxic metals including arsenic, beryllium, and lead. Other contaminants may be present and will be investigated.

What is the difference between OU1 and OU2 at the Site? Why was the Site divided?

Contaminated sites all across the country are often divided into multiple Operable Units (OUs) based on geography, waste type, or media type (for example, soil or water). Each OU can be investigated or cleaned up separately, which makes the site less complex.

At this Site, the investigation and cleanup has been divided into two OUs:

- Operable Unit 1 (OU1) deals with the cleanup of surface and subsurface soil within the government property. The investigation for OU1 has already taken place, and NPS chose a plan to clean up the contamination, which Washington Gas is now performing.
- Operable Unit 2 (OU2) deals with groundwater, surface water, and sediments of the Anacostia River where hazardous substances released at or from the Washington Gas property have come to be located. NPS and DDOE will oversee Washington Gas's investigation of OU2, and once information is gathered from that investigation, an appropriate plan will be selected to clean up OU2.

Questions about the Operable Unit 1 Remedial Action, which began in December 2014

What is the Remedial Action at OU1?

OU1 is the surface soils and subsurface soils on the government property. Washington Gas investigated OU1 and NPS used the information to select a remedy addressing contaminated surface and subsurface soil on the government property to protect human health and the environment. The parties then entered into a Consent Decree that requires Washington Gas to perform the following OU1 Remedial Actions.

- Excavate up to 3 feet of contaminated surface and subsurface soil.
- Backfill all excavated areas with clean fill and topsoil.
- Establish healthy vegetative cover over the clean soil at the government property.
- Implement an Institutional Controls Program to ensure that people working or playing on the government property are not exposed to risks from hazardous substances and that future uses of the property do not make the remedy less protective.

Public access to the government property will be limited for an additional two years after on-site work is complete. This will ensure that grass and other plants will grow to prevent erosion.

Was there public input into the OU1 investigation and cleanup?

Yes, public input on OU1 investigation and cleanup was considered at the following times.

- In June 1999, NPS issued a Proposed Plan detailing the preferred method for cleaning up the site and inviting public comment. There was a 30-day public comment period, and a public meeting was held during that time to discuss community concerns. All of the written or oral comments received by NPS were considered and addressed in the 2006 Record of Decision.
- In 2011, NPS provided an opportunity for the public to comment on the Consent Decree that had been negotiated with Washington Gas, and considered all public comments received before entering the final Consent Decree with the court.

When can I comment on the OU1 cleanup?

The official public comment period has closed for OU1. No additional formal public comment periods will be held for OU1, however, if you have questions or concerns about how the work is being conducted, please reach out to NPS. Washington Gas will also respond to community concerns.

Will there be dust and odors outside the property during the work?

There is a monitoring plan in place for dust, odors, and noise. Washington Gas will try to minimize all of these concerns. If you have concerns or complaints about the field work, please call Washington Gas at (202) 624-6411.

How will traffic be affected?

There was intensive truck use on Water Street, SE, from January through July of 2015. There should be no heavy truck traffic to and from the Site after the summer of 2015. Trucks parked near the Site may be related to the DC Water project on Water Street.

Safety is our primary concern. If you have concerns about traffic problems or delays caused by work at the government property, please call the Washington Gas phone number at (202) 624-6411.

Will you widen Water Street to accommodate trucks?

The roadway will not be changed for the OU1 work. Additional gravel was placed on the road shoulders to reduce the soil that is tracked onto the roadway by trucks that stop on the roadside.

How many trucks per day will be at this location?

In a typical day, 15-20 trucks were loaded or unloaded at OU1.

What hours of the day will trucks be at OU1?

Work at OU1 occurred on weekdays and some Saturdays between approximately 6:30 am and 6:00 pm. Truck schedules were adjusted, when necessary, to avoid high traffic times or events.

Will the DC Water project be affected by the OU1 work?

Washington Gas and DC Water work together to limit potential conflicts related to road use. DC Water contractors are instructed not to use the government property to park trucks or equipment.

If this is public property, why will it be fenced?

A fence will be installed from December 2014 through 2017 for two reasons:

- From December 2014 through the summer of 2015: To protect public health and safety during excavating and backfilling work.
- From summer 2015 through 2017: To ensure a healthy grass cover grows to prevent erosion. The performance standards for this clean-up require that a high-quality vegetative cover is present for two consecutive years after cleanup.

What will the government property be used for when it is clean?

Once the property is clean, it will be available for recreational purposes, and the western end of the property will host part of the Anacostia Riverwalk Trail.

Will the Anacostia Riverwalk Trail be off-limits for the next two years?

The Anacostia Riverwalk Trail, which is currently along Water Street, will remain intact during the OU1 work. As part of the OU1 work, the Anacostia Riverwalk Trail will be re-routed to go beneath the bridges along the River, rather than along Water Street. This new trail will not be available for use until after the OU1 work is complete and the fence has been removed.

Why are you only digging to 3 feet?

Replacing contaminated soil found between 1 and 3 feet with clean soil creates an effective barrier between any remaining contamination (deeper than 3 feet) and the surface. This barrier (or, “cap”) is appropriate for the recreational future use of the property. This will also support a healthy grass cover that will prevent erosion of the new, clean soil.

Will there be contamination below 3 feet left in place? If so, how are you going to protect me and my family in the future?

Once the OU1 remedy is complete, there will be manufactured gas waste contamination left below 3 feet; however, the contamination left in place (under the protective cap) is primarily coal tar-related, and tends to stick to soil or migrate downward (not upward towards the surface). In addition, the following measures will be used to protect human health and the environment:

- the contamination left in place will not be accessible at ground surface because it will be beneath a cap of 1 to 3 feet of clean soil, which will be covered by healthy vegetation to prevent erosion;
- bright orange indicator fabric will be placed above any identified contamination to alert anyone digging on-site in the future;
- any contamination affecting the Anacostia River will be investigated and addressed during the OU2 investigation and remedial action; and
- institutional controls at the government property will be used to ensure the protection of human health and the environment long into the future, and will include:

- any potential future excavation will be limited and supervised; and
- any tar discovered at the government property after OU1 work is completed must be reported and mapped.

What are institutional controls and are they legally enforceable?

“Institutional controls” are administrative or legal controls that help to protect people from wastes at a Site by limiting how the property is used. They can also ensure that the remedy remains effective. The federal or District governments may create institutional controls. For example, if the soil beneath 3 feet should not be exposed, an institutional control could limit digging and require soil cover maintenance.

The institutional control requirements for OU1 are part of the Consent Decree and, therefore, are legally enforceable. As long as the contamination being addressed by the Consent Decree presents a potential risk to human health or the environment, institutional controls will be attached to the property deed and will stay with the land, even if ownership of the land changes.

Will there be a non-porous membrane between 3 feet and deeper soil to stop upward migration of contaminants?

There will be a bright orange indicator fabric installed to:

- prevent digging where soil contamination is detected by eye, nose, touch, or photoionization detector; and
- allow water drainage while separating clean and contaminated soils.

A non-porous membrane will not be installed because:

- contaminants at the government property are primarily coal tar-related, and tend to stick to soil or migrate (move) downward; and
- contaminated soil vapor at the government property has been studied but was not identified as a risk.

What has been happening since the Consent Decree was entered?

The final Consent Decree was entered on September 26, 2012. Since then, NPS, DOEE, and Washington Gas worked through the complex design and planning process for the OU1 on-site remediation, which included:

- developing specific methods for properly removing and disposing of contaminated soil;
- sourcing, testing, and transporting clean soil to be used for the Site cap once the contaminated soil was removed; and
- choosing controls to prevent risks to health, safety, and the environment during the cleanup.

The on-site remediation activity for OU1 started in December of 2014 and will be completed in the summer of 2015.

Questions about the Remedial Investigation/Feasibility Study (RI/FS) at Operable Unit 2

What is required at OU2?

OU2 is the groundwater, surface water, and sediments of the Anacostia River where hazardous substances released at or from the Washington Gas property have come to be located. OU2 is at an earlier stage in the CERCLA process than OU1 and still needs to be investigated before a cleanup plan is selected. As required by the Consent Decree for the Site, Washington Gas will investigate the nature and extent of contamination and, if necessary, develop and evaluate options for a cleanup. This process is called a Remedial Investigation and Feasibility Study, or “RI/FS.” NPS and DOOEE will oversee all of Washington Gas’s work at the Site.

The OU2 RI/FS activities include, but are not limited to:

- investigation of the nature and extent of Site contamination in groundwater discharging to the Anacostia River, surface water, and River sediments;
- investigation of contaminant transport to the Anacostia River;
- evaluation of risk to human health and the environment; and
- identification and evaluation of potential cleanup alternatives.

What is the OU2 RI/FS process? What happens after the investigation?

The RI/FS will proceed as follows.

- The Remedial Investigation (RI) will begin at the government property with a groundwater and non-aqueous phase liquid (NAPL) investigation near the seawall.
- The RI results will be used to select the most appropriate locations to sample groundwater beneath the Anacostia River, in addition to sediment, pore water, and surface water in the river.
- The RI results will be used to develop a range of cleanup alternatives in a Feasibility Study (FS).

Once the FS Report is complete, then:

- A Proposed Plan will summarize the Feasibility Study results and present NPS’s preferred cleanup alternative to the public for review and comment.
- NPS will consider all comments received during the public comment period, and NPS and DOEE will host a public meeting during this time, to get community input. Comments will also be accepted in writing.
- Once all comments are considered, NPS, in consultation with DOEE, will select an appropriate cleanup for OU2 and will publish its decision in a Record of Decision (ROD).
- The parties will then design and implement the OU2 cleanup.

Have deep soil cores been collected at the government property in previous investigations?

Soil coring has been completed to the Arundel clay, which is as deep as approximately 50 feet below ground surface. Some of these deep soil cores contained manufactured gas-related material.

Will OU2 be part of the Anacostia River Sediment Project, and what area in the Anacostia River will be studied?

This investigation is separate from the Anacostia River Sediment Project, but NPS and DOEE will ensure that the OU2 investigation adds useful and appropriate information to the Anacostia River dataset. The purpose of the OU2 RI/FS is to determine:

- the nature and extent of Washington Gas Site contamination in the groundwater that discharges to the Anacostia River; and
- the nature and extent of Washington Gas Site contamination in surface water and sediments in the Anacostia River.

There is no defined, pre-determined boundary because OU2 includes all groundwater, surface water, and sediments of the Anacostia River where hazardous substances released at or from the Washington Gas East Station Property have come to be located.

Will forensics be run on the sediment samples?

Yes, chemical fingerprinting techniques will be used at the government property and in the Anacostia River to help determine the source, migration, and extent of OU2 contamination.

How long will pump and treat occur? Are there plans to change the discharge of the pump and treat system?

The pump and treat system will continue indefinitely. There are no current plans to change the pump and treat system. Any changes planned as a result of the RI/FS will be part of the CERCLA process and will be open to public review and comment.

How long will the OU2 project take?

The timing for the OU2 project will depend on the findings of the RI and the complexity and size of the selected remedy. The following activities must be completed for the OU2 investigation and clean up:

- Finalize RI details in a Work Plan and related planning documents. The document review and revision process is being completed according to the requirements of the 2012 Consent Decree.
- Perform the RI
- Write the RI report
- Perform a treatability study
- Write an FS report
- Present the Proposed Plan and invite public comment
- Consider public comments received and finalize the Record of Decision
- Complete Remedial Design
- Implement the Remedial Action. The selected Remedial Action will be coordinated as efficiently as possible with the Anacostia River Sediment Project

What will the monitoring wells be used for and how long will they be in place?

Groundwater analytical results from the monitoring wells at the government property will be used in three ways:

- to make immediate decisions regarding in-river sampling locations and depths;
- to choose the best cleanup alternative; and
- to monitor the effectiveness of the cleanup.

Because the wells will be used to check effectiveness of the cleanup, they will be on the property for many years.

Will monitoring wells affect recreational use of the property?

Monitoring wells will be finished flush with ground level so they will not limit future recreational use of the government property.

When will I have a chance to comment on the OU2 cleanup?

After the OU2 investigation, NPS will prepare a Proposed Plan, which explains NPS's preferred method for cleanup. A public meeting will be held to present the Proposed Plan to the community, and there will be a public comment period of at least 30 days. A Notice of Availability to review and comment on the Proposed Plan will be published on the NPS Washington Gas – East Station Site website and in the Washington Times. A notice will also be sent via email to interested parties identified in the Community Involvement Plan for the Site. If you are not on the email list but would like to be, please contact NPS.

NPS will consider all comments received during the public comment period and, if appropriate, incorporate the comments into the Record of Decision (ROD).