

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**FINAL DECISION AND RESPONSE TO COMMENTS  
NAVAL SUPPORT ACTIVITY BETHESDA**

**INTRODUCTION**

The United States Environmental Protection Agency (EPA) is issuing this Final Decision and Response to Comments (FDRTC or Final Decision) in connection with the Naval Support Activity (NSA) Bethesda facility located in Bethesda, Maryland (hereinafter referred to as the Facility).

The Facility is subject to the Corrective Action program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 *et seq.* The Corrective Action program is designed to ensure that certain facilities subject to RCRA have investigated and addressed releases of hazardous waste and hazardous constituents that have occurred at their property.

On December 20, 2000, EPA issued a RCRA Corrective Action permit, EPA ID No. MD4170024687 (CA Permit), under RCRA Section 3004(u), 42 U.S.C. Section 6924(u), to National Naval Medical Center (NNMC). The facility name was changed to NSA Bethesda on October 1, 2011.

On June 3, 2013, EPA issued a Statement of Basis (SB) in which it described the information gathered during environmental investigations at the Facility and proposed a Final Decision for the Facility. Concurrent with the SB, EPA issued a Draft CA Permit requiring the No Further Action for the units described in Table I of that document and the continued investigation of the remaining 10 Solid Waste Management Units (SWMUs) and 5 Areas of Concern (AOCs). The SB is hereby incorporated into this Final Decision by reference and made a part hereof as Attachment AA. A Final CA Permit is being issued to implement the remedy.

Consistent with the public participation provisions under RCRA, EPA solicited public comment on its proposed Final Decision. On June 19, 2013, notice of the Statement of Basis was published on the EPA website and in The Washington Times newspaper. Comments on the proposed Final Decision were received from NSA Bethesda. All of the comments received by EPA during the public comment period are included as Attachment BB, PUBLIC COMMENTS AND RESPONSE TO COMMENTS. Based on comments received during the public comment period EPA has determined it is not necessary to modify its proposed Final Decision as set forth in the SB; thus, the remedy proposed in the SB is the Final Decision selected by EPA for the Facility.

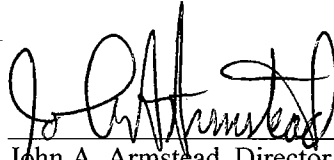
**FINAL DECISION**

EPA's Final Decision for the Facility consists of No Further Action for 15 SWMUs and 5 AOCs described in Table 1 of the SB and addressing the remaining 10 SWMUs and 5 AOCs in the Final Permit.

**DECLARATION**

Based on the Administrative Record, I have determined that the Final Decision as set forth in this Final Decision is appropriate and will be protective of human health and the environment.

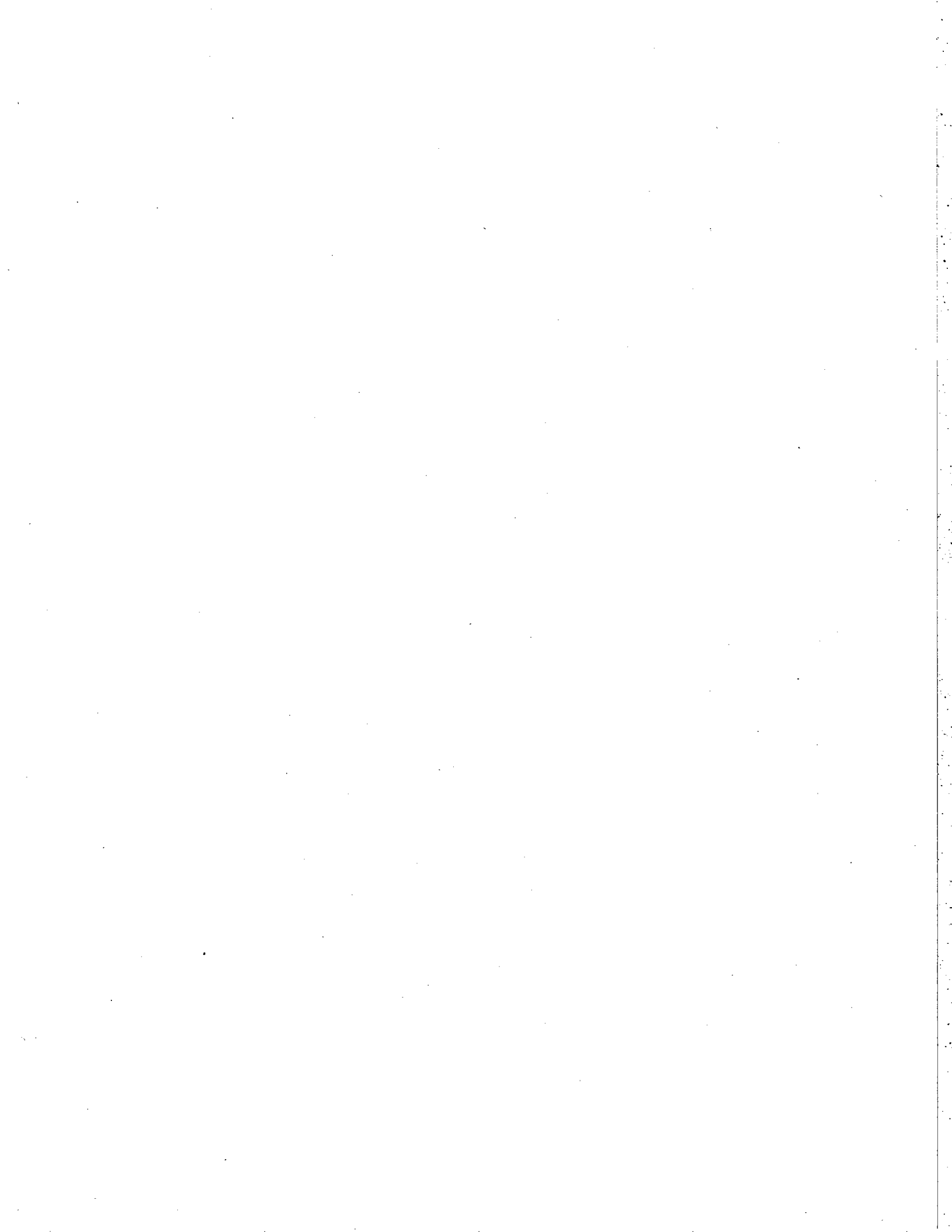
Date: 9.25.13



John A. Armstead, Director  
Land and Chemicals Division  
U.S. Environmental Protection Agency, Region III

Attachment AA: Statement of Basis (June 3, 2013)  
Attachment BB: EPA Response to Comments  
Attachment CC: Status of SWMUs and AOCs

## Attachment AA – Statement of Basis



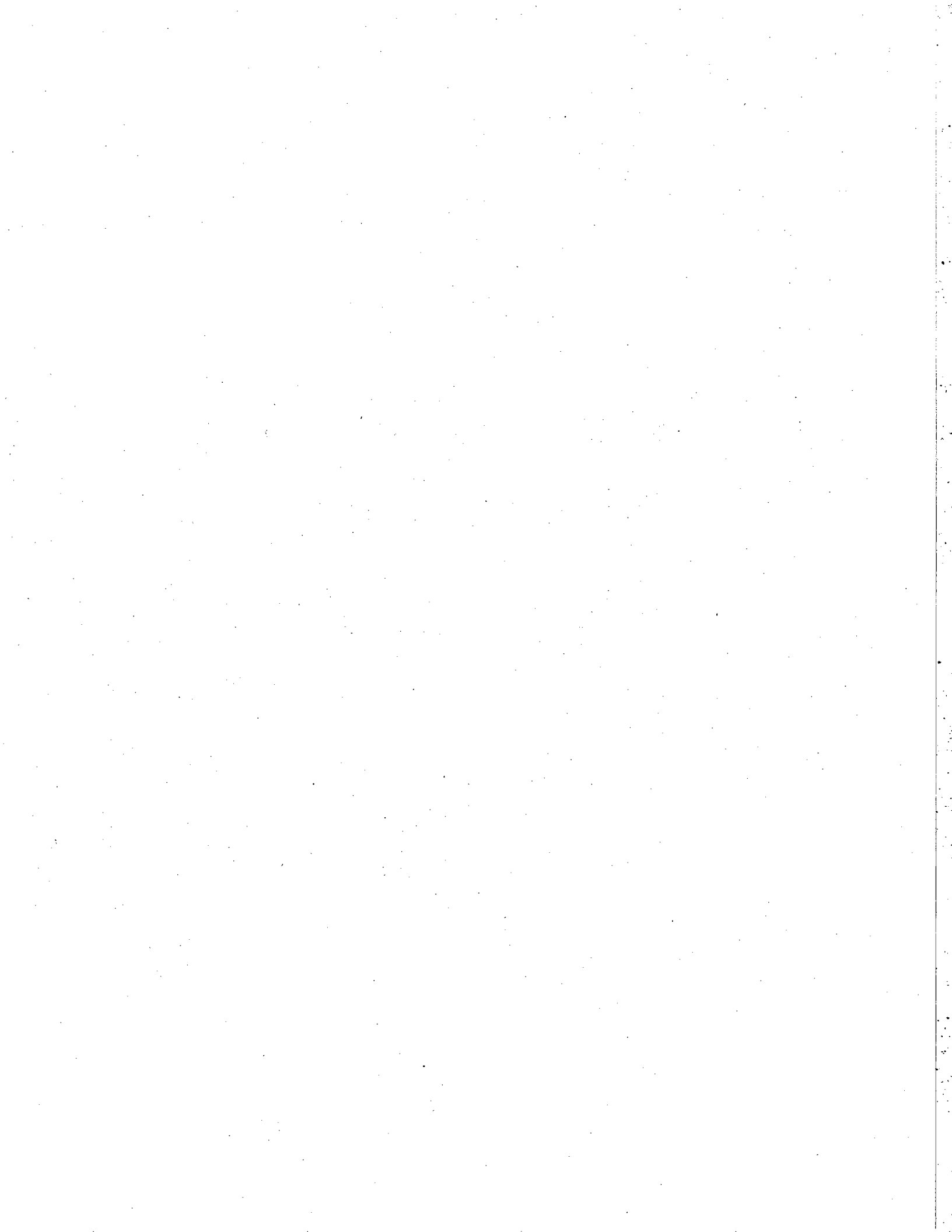


UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III

STATEMENT OF BASIS

National Support Activity Bethesda  
BETHESDA, MARYLAND

Prepared by  
Office of Remediation  
Land and Chemicals Division  
May 29, 2013



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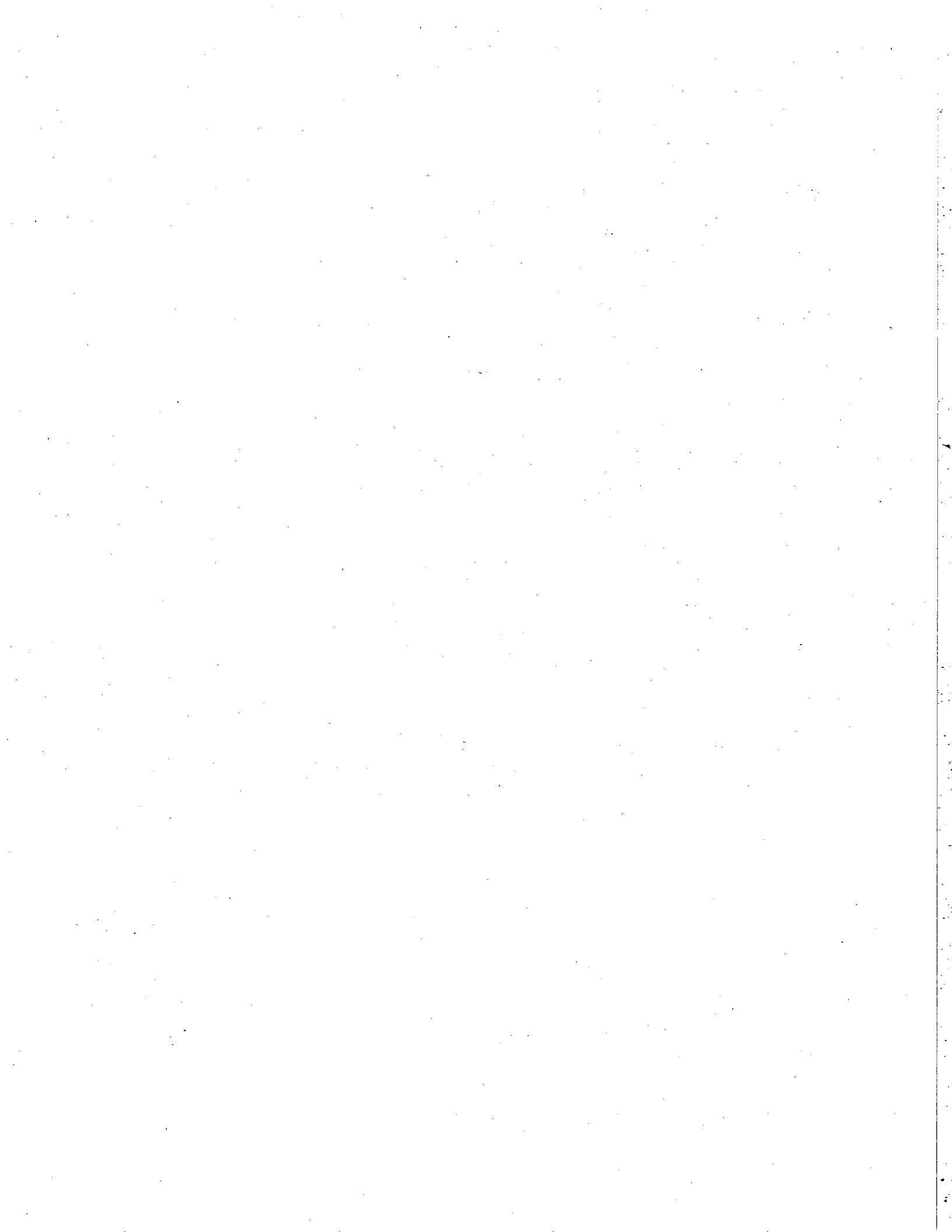
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- Figure 1: Location map
- Figure 2: Facility layout





## Section 1: Introduction

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The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the Naval Support Activity Bethesda (NSA) facility located in Bethesda, Maryland northwest of Washington, D.C. in Montgomery County, Maryland (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from a number of units at the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required for these units at the Facility. EPA has determined that its proposed remedy is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time for these units at the Facility. The remaining units at the Facility will be further investigated under the Permit (discussed later) and at a later time EPA will be soliciting comments on a proposed remedy for the remaining portions of the Facility. This SB highlights key information relied upon by EPA in making its proposed remedy.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The State of Maryland (Maryland) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in Maryland for the Corrective Action Program.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 6, Public Participation, for information on how you may review the AR. The Index to the AR may be found in Attachment #1.

Concurrently with this SB, EPA is soliciting comments on a draft Corrective Action Permit (Permit). Pursuant to 40 C.F.R. §124.7, EPA has prepared this SB to describe the background and basis for the draft Permit and the reasons supporting the proposed remedy. The draft Permit incorporates the remedies proposed in this SB. EPA's proposed final remedy as described in this SB supports EPA's proposal to remove the units addressed in this SB from the Facility's Corrective Action permit requirements.

EPA will make a final decision on the draft Permit after considering all information submitted during the public comment period. If no comments are received during the public comment period on the draft Permit, the final Permit will be signed and will become effective upon signature. Otherwise, the final Permit will become effective forty-five (45) days after the service of notice of the final remedy or upon conclusion of any appeals filed. EPA will issue a Final Decision and Response to Comments (FDRTC) after considering all comments submitted with respect to this SB. The FDRTC will be incorporated into the final Permit and made a part thereof.

Information on the Corrective Action Program as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

## Section 2: Facility Background

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The Facility consists of approximately 243 acres located in Bethesda, Maryland northwest of Washington, D.C. in Montgomery County, Maryland. The Facility is bounded by Wisconsin Avenue (State Route 355, also known as Rockville Pike) to the west; Jones Bridge Road to the south; Stone Ridge School and the Parkview Estates residential neighborhood to the north; Interstate 495 to the northeast; and a local park and Chevy Chase View residential area to the east. The National Institutes of Health (NIH) complex is located on the west side of Wisconsin Avenue, adjacent to and west of the NSA property. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

The Naval Medical Command, National Capital Region (NMCNCR) was commissioned on February 5, 1942. In 1973 the Naval Hospital and NMCNCR were consolidated into one command, the National Naval Medical Center (NNMC). On Oct 1, 2011 the name of the facility was changed to NSA Bethesda.

A new, state-of-the-art hospital replaced the older one and was dedicated on November 21, 1980. This Facility consists of two buildings: a three-story outpatient structure, which adjoins a seven-story inpatient building with 500 replacement beds. The two buildings have a combined area of more than 880,000 square feet.

The NSA and its tenant activities employ more than 6,500 employees, about two-thirds of whom are military personnel, whose activities result in the generation and storage of general solid, medical, mixed, radioactive, and hazardous wastes.

## Section 3: Summary of Environmental History

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On December 30, 2000, EPA issued a RCRA Corrective Action Permit, EPA ID No. MD4170024687 (Initial Permit), under RCRA Section 3004(u), 42 U.S.C. Section 6924(u), to NNMC for the Facility. The Initial Permit, which on its terms expired on December 30, 2010, has been administratively extended. The Initial Permit currently governs corrective action at the Facility. Numerous investigations and actions have been completed and various reports have been submitted to the EPA since the issuance of the Initial Permit.

Twenty-two Solid Waste Management Units (SWMUs) and nine Areas of Concern (AOCs) were identified in the Initial Permit. In 2001, this number was changed to 23 SWMUs and 10 AOCs based on units being combined as well as added to the investigation. Subsequently, the RCRA Facility Investigation (RFI) addressed 25 SWMUs and 10 AOCs. Attachment 2 lists the SWMUs and AOCs. Figure 2 shows the location of each unit.

Table 1 below describes the 15 SWMUs and five (5) AOCs covered in this SB. The remaining 10 SWMUs and five (5) AOCs are still under investigation and EPA proposes to address them in the final Permit.

Complete details, including sampling data, can be found in the individual reports which are listed in the Index section of this SB and located in the AR. Sampling included surface and subsurface soil, groundwater, sediment and surface water sampling, wipe sampling and concrete sampling at the Facility. Chemicals of concern (COCs) included Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), Pesticides and PCBs, Metals, Dioxins and Furans, and Radionuclides.

Table 1

Solid Waste Management Units/ Areas of Concern	Description	Current status
SWMU # 4 – Pesticide Shop Former Temporary Storage Area	Area formerly occupied by a 10-foot wooden shed used to temporarily store outdated pesticides that had exceeded their shelf life.	Human Health Risk Assessment (HHRA) indicated no further action required
SWMU # 5 – Roadside Laboratory Waste Disposal Area	Located in the northeastern portion of the Facility, comprised of roadside areas adjacent to Taylor Road	HHRA indicated no further action required
SWMU # 6 – Carpenter Shop Temporary Storage Area	Consists of a 55-gallon drum that was used, starting in 1988, to collect used paint thinner in the Carpenter Shop in Building 15.	No evidence of release
SWMU #8 – Former Building 224 Storage Area	Operated as the controlled hazardous substance facility for hazardous waste for NSA prior to 1988	No COCs detected in surface and subsurface soil exceeded residential risk-based concentrations (RBCs) or generic soil screening levels (SSLs)
SWMU #9 – NMRC Xylene Disposal Area	An approximately 100- by 200-foot area southeast of Buildings 21, 150, and 146 where unknown quantities of waste xylene generated by the Naval Medical Research Center (NMRC) were reportedly buried and poured onto the ground	HHRA indicated no further action required
SWMU #12 – Naval Hospital Xylene Distillation Unit	A 6-foot-high brass and glass distillation column, located on a concrete floor in Room 0268A of the Naval Hospital (Building 9)	No evidence of release
SWMU #13 – Dental Lab Temporary Storage Area	An inactive 90-day temporary storage unit consisting of a yellow hazardous materials locker in Room 2604 of Building 2	No evidence of release
SWMU #14 – NCI Temporary Storage Area	A 2-foot by 4-foot by 5-foot white wooden cabinet, originally located in the NCI laboratory on the fifth floor of Building 8	No evidence of release
SWMU #15 – NMRI Temporary Storage Area	A 20-foot by 20-foot room in Bldg 17 that was used for temporarily storing wastes	EPA agreed in the Corrective Action Permit Response to Comments that there was no evidence of release so this SWMU should not be part of the Initial Permit.

SWMU #16 – NMRI Current Temporary Storage Area	A 15-foot by 10-foot room with concrete floors and walls that was used to temporarily store Naval Medical Research Institute (NMRI) laboratory wastes for less than 90 days	No evidence of release
SWMU #18 – Military Gas Station Solvent Storage Unit	A self-contained automotive-parts cleaning unit inside the military gas station (Building 155) along the western corner of the northern wall of the building	No evidence of release
SWMU #21 – AFRI Satellite Accumulation Area	An 8-foot by 8-foot room in the basement of Armed Forces Radiobiology Research Institute (AFRI) Building 42 in the southeast portion of NSA	No evidence of release
SWMU #25 – USUHS Current Temporary Storage Area	A 20-foot by 40-foot concrete block room with a concrete floor in Bay 8 of Building 74	No evidence of release
SWMU #28 – Base Exchange Gasoline Recovery System	A system used to recover gasoline from groundwater adjacent to the Base Exchange Gas Tanks (SWMU 27)	No evidence of release
SWMU 34 – Pesticide Handling and Mixing Building	A one-story 4,040 square foot metal building where pesticide handling and mixing previously took place	HHRA indicated no further action required
AOC #1 – Mercury Removal Actions in Building 17	The buildings' interiors and the drain pipes, sanitary sewer, and soil beneath the buildings	Interim measures for mercury vapor readings lower than Interim Measures (IM) criteria after remediation
AOC #4 – Bldg 21 UST	A steel 1,000-gallon fuel oil underground storage tank (UST) located near Building 21	HHRA indicated no further action required
AOC #7 – Building 256 Pesticide Spill	Spill of approximately 15 gallons of methoxychlor on the pavement outside of Building 256 (SWMU #1)	Clean-up completed and documented in RFI report. The results of RFI soil sampling indicated that no residual pesticides exist in the area of the spill.
AOC #8 – NMRI radioactivity Contaminated Bldg	Centrally located in the Facility boundaries (Figure 25-1) and encompasses Building 150, which was constructed in the early 1950s to irradiate animals and analyze the effects of ionizing radiation to organs and cellular systems	Decontamination and decommissioning activities reduced Cobalt concentrations to acceptable levels based on the criteria set forth in 10 CFR 20, Subpart E.

AOC #12 – Basin 5 Sanitary Sewer Outside of Bldgs 17, 18 and 21	Sanitary sewer system and associated manholes, leading from the buildings to the main sewer line	IM included removal or abandoned in place of all sanitary piping that drained janitor closets and laboratories in Buildings 17, 18, and 21
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#### **Section 4: Proposed Remedy**

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EPA has found that the units described in Table I do not pose any unacceptable risk to human health or the environment and EPA proposes these units for No Further Action. The remaining 10 SWMUs and five (5) AOCs are still under investigation and EPA proposes to address them in the final Permit.

#### **Section 5: Environmental Indicators**

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EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The EPA has determined that the Facility met the current human exposures under control indicator on July 9, 2004. The EPA has determined that the Facility met the migration of contaminated groundwater under control indicator on August 23, 2004.

#### **Section 6: Public Participation**

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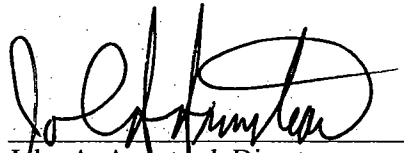
Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed remedy. It is available for public review during normal business hours at:

U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Estena McGhee  
Phone: (215) 814-3433  
Fax: (215) 814-3113  
Email: mcghee.estena@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed remedy. The public comment period will last forty-five (45) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Ms. Estena McGhee. EPA will hold a public meeting to discuss this proposed remedy upon request. Requests for a public meeting should be made to Ms. Estena McGhee.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed remedy, EPA will modify the proposed remedy or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed remedy will receive a copy of the FDRTC. Others may obtain a copy by contacting Ms. Estena McGhee at the address listed above.

6-3-13  
Date

  
John A. Armistead, Director  
Land and Chemicals Division  
US EPA, Region III

## Attachment #1

### Index to Administrative Record

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June 1, 2000	EPA response to comments on Corrective Action Permit
September 13, 2000	NNMC letter to EPA with NNMC comments on draft Corrective Action permit for NNMC Bethesda, MD
November 21, 2000	EPA letter to NNMC transmitting Corrective Action Permit
November 21, 2000	Corrective Action Permit issued to NNMC by EPA (includes Attachments A thru G)
October 16, 2001	EPA letter to NNMC for no further action determination at SWMU 16
May 2002	Addendum I Final QAPP for Priority I RFI
July 2002	Final Priority I RCRA Facility Investigation Project Plan <ul style="list-style-type: none"><li>• NNMC Executive Summary</li><li>• Project Management Plan for Priority I</li><li>• Description of Current Conditions Report</li><li>• Sample Collection Methods and Procedures Plan</li><li>• Data Management Plan</li><li>• Health &amp; Safety Plan</li></ul>
October 2002	Final Interim Measures Implementation Report for AOC 1
January 31, 2003	EPA No Further Action determination for AOC1 – Bldg. 17 Mercury Removal Action
March 15, 2003	EPA letter to NNMC comments on AOC 1 Interim Measures Implementation Report
June 2003	Draft Final Interim Measures Implementation Report for AOC 12
July 2003	Interim RCRA Facility Investigation Report No. 1
July 31, 2003	NNMC response to EPA's comments dated 3/15/2003 on AOC 1 Interim Measures Implementation Report
September 2003	Project Plan for Priority II RCRA Facility Investigation

September 2003 November 4, 2003	Draft-Final Basewide Ecological Risk Assessment Work Plan EPA letter to NNMC comments on AOC 1 Interim Measures Implementation Report
December 31, 2003	EPA letter to NNMC comments on AOC 12 Interim Measures Implementation Report
January 6, 2004	Building 150 Underground Storage Tank Decommissioning Project Report
March 15, 2004	Technical Memorandum, Response to USEPA Comments on the AOC 12 Interim Measures Implementation Report
July 9, 2004	Human Health Environmental Indicator Form completed
August 23, 2004	Groundwater Environmental Indicator Form completed
October 8, 2004	EPA letter to NNMC approving Draft Final Interim Measures Implementation Report
June 2005	Sampling and Analysis Plan for the Priority III RFI
June 2006	Interim Draft Basewide Ecological Risk Assessment
November 2, 2007	Technical Memorandum Risk Evaluation for SWMU 5 Roadside Laboratory Waste Disposal Area
April 30, 2008	Technical Memorandum Risk Evaluation for AOC 1 – Buildings 17, 18 and 21 Mercury Removal Actions
April 30, 2008	Technical Memorandum Risk Evaluation for AOC 2 – Building 42 Underground Storage Tank and Building 53 Underground Storage Tank
April 30, 2008	Technical Memorandum Risk Evaluation for AOC 4 – Building 21 Underground Storage Tank
April 30, 2008	Technical Memorandum Risk Evaluation for AOC 8 – NMRI Radioactivity Contaminated Building
April 30, 2008	Technical Memorandum Risk Evaluation for SWMU 9 NMRI Xylene Disposal Area.
April 30, 2008	Technical Memorandum Risk Evaluation for SWMU 13 Dental Lab Temporary Storage Area
April 30, 2008	Technical Memorandum Risk Evaluation for SWMU 14 National Cancer Institute (NCI) Temporary Storage Area



April 30, 2008	Technical Memorandum Risk Evaluation for SWMU 18 Military Gas Station Solvent Storage Area
June 2008	RCRA Facility Investigation Report
February 18, 2011	EPA letter transmitting comments on RFI Report
March 15, 2011	Meeting summary report
May 5, 2011	EPA letter to NNMC for no further action determination at SWMUs 6, 12, 13, 14, 16, 18, 21, 25, 28, AOCs 1, 12
May 11, 2011	EPA letter to NNMC for no further action determination for AOC 4
August 17, 2011	Technical Memorandum Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report- Section 9 – SWMU 4 Pesticide Shop Former Temporary Storage Area and SWMU 34 Pesticide Mixing and Handling Building
August 17, 2011	Technical Memorandum Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report- Section 10 – SWMU 5 Roadside Laboratory Waste Disposal Area
August 17, 2011	Technical Memorandum Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report- Section 11 – SWMU 8 Former Building 224 Storage Area
August 17, 2011	Technical Memorandum Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report- Section 12 – SWMU 9 NMRI Xylene Disposal Area
August 17, 2011	Technical Memorandum Response to USEPA Comments on the Draft-Final RCRA Facility Investigation Report- Section 13 – SWMU 17 Military Gas Station Waste Oil Tank
August 25, 2011	Meeting Notes, USEPA Site Visit at NNMC
May 23, 2012	EPA letter to NSA for no further action determination at SWMU 4 and 34
May 23, 2012	EPA letter to NSA for no further action determination at SWMU 5
May 23, 2012	EPA letter to NSA for no further action determination at SWMU 8
May 23, 2012	EPA letter to NSA for no further action determination at SWMU 9

May 23, 2012 EPA letter to NSA for no further action determination at SWMU 17

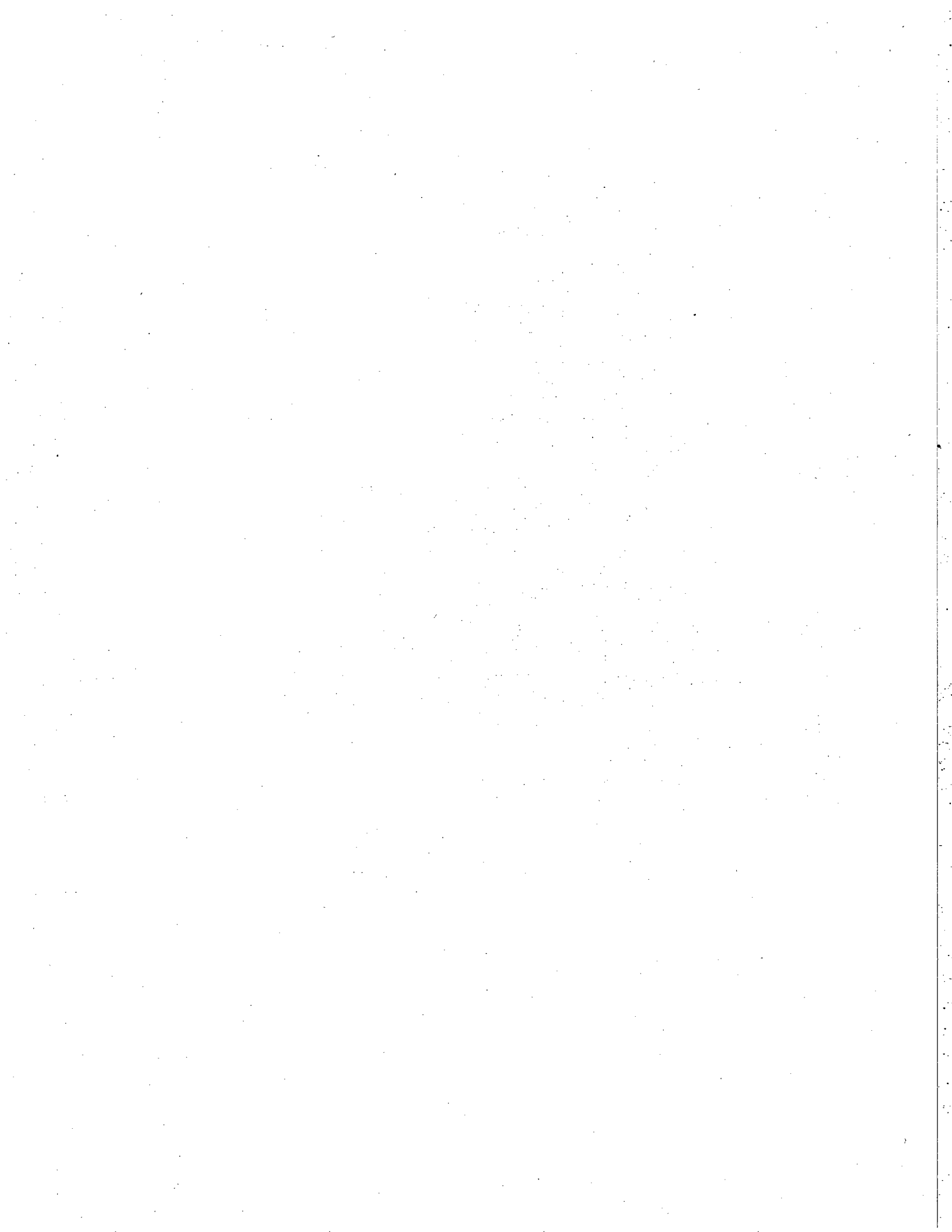
June 27, 2012 Meeting Notes, NSA meeting with EPA to discuss RFI report

June 27, 2012 Meeting summary report

March 20, 2013 Technical Memorandum Solid Waste Management Unit (SWMU) 15 –  
Naval Medical Research Institute (NMRI) Former Temporary Storage  
Unit

**Attachment # 2**  
**LIST of SWMUS and AOCs**

<b>SWMU/ AOC</b>	<b>Description</b>
SWMU 1	Bldg 256 Storage Facility
SWMU 2	Former Laboratory Waste Disposal Area
SWMU 3	Asbestos Burial Area
SWMU 4	Pesticide Shop Former Temporary Storage Area
SWMU 5	Roadside Laboratory Waste Disposal Area
SWMU 6	Carpenter Shop temporary Storage Area
SWMU 8	Former Building 224 Storage Area
SWMU 9	NMRC Xylene Disposal Area
SWMU 12	Naval Hospital Xylene Distillation Unit
SWMU 13	Dental Lab Temporary Storage Area
SWMU 14	NCI Temporary Storage Area
SWMU 15	NMRI Former Temporary Storage Unit
SWMU 16	SWMU
SWMU 17	Military Gas Station Waste Oil Tank
SWMU 18	Military Gas Station Solvent Storage Unit
SWMU 20	AFRRI Mixed Waste Underground Storage Tanks
SWMU 21	AFRRI Satellite Accumulation Area
SWMU 22	Uniformed Services University of the Health Services Scintillation Fluid Disposal Facility
SWMU 23	Storm Sewer System
SWMU 25	USUHS Current Temporary Storage Area
SWMU 28	Base Exchange Gasoline Recovery System
SWMU 32	Metal Storage Yard
SWMU 33	Million Dollar Hill
SWMU 34	Pesticide Handling and Mixing Building
SWMU 35	Debris Disposal Area Near Buildings 147 and 239
AOC 1	Mercury Removal Actions in Building 17
AOC 2	Bldg 42 UST and Bldg 53 UST
AOC 3	Removed UST
AOC 4	Bldg 21 UST
AOC 5	Bldg 188 UST
AOC 6	Power Plant Spill
AOC 7	Bldg 256 Pesticide Spill
AOC 8	NMRI radioactivity Contaminated Bldg.
AOC 11	USUHS Hydraulic Fluid Spill
AOC 12	Basin 5 Sanitary Sewer Outside of Bldgs 17, 18 and 21



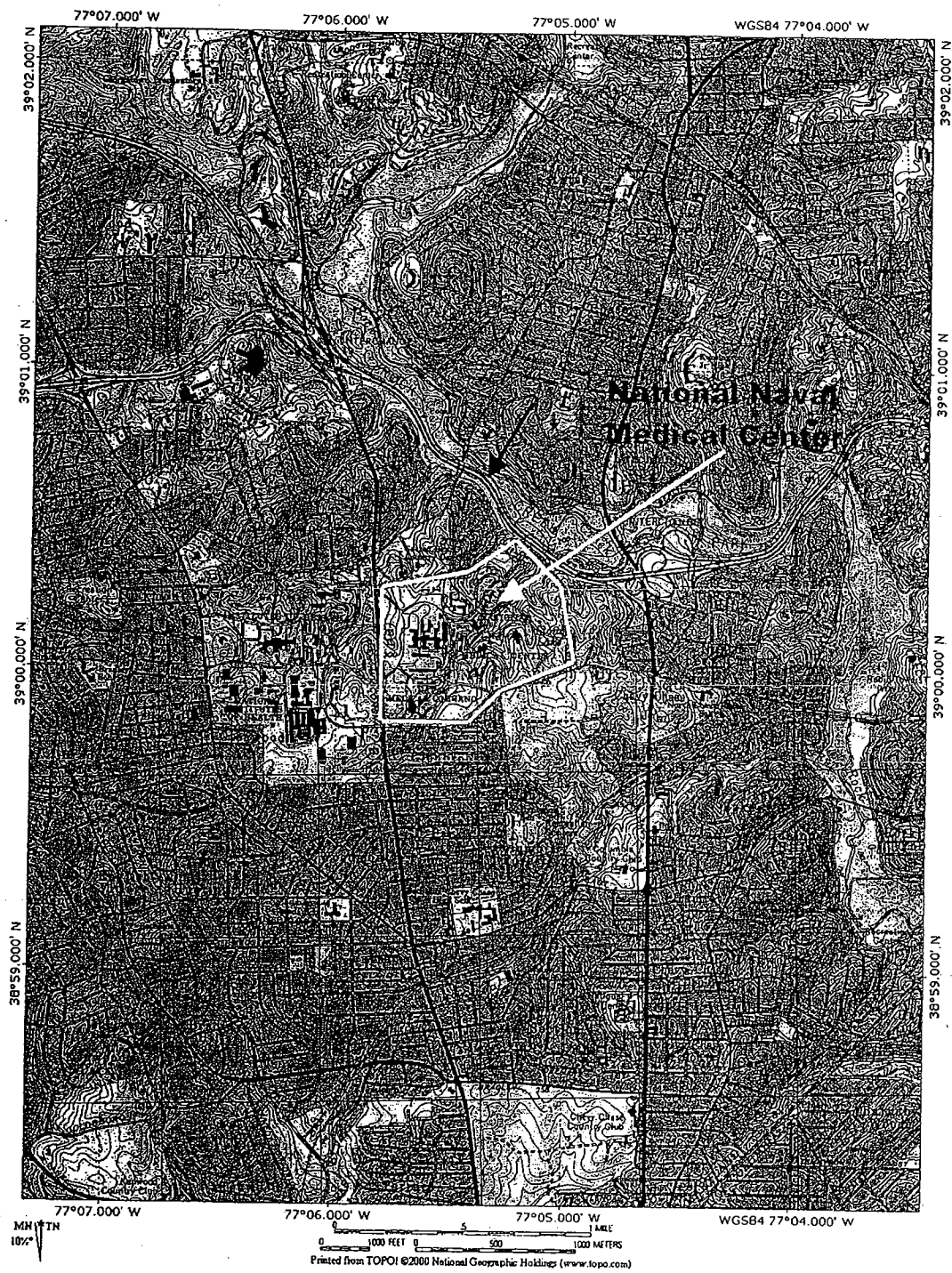
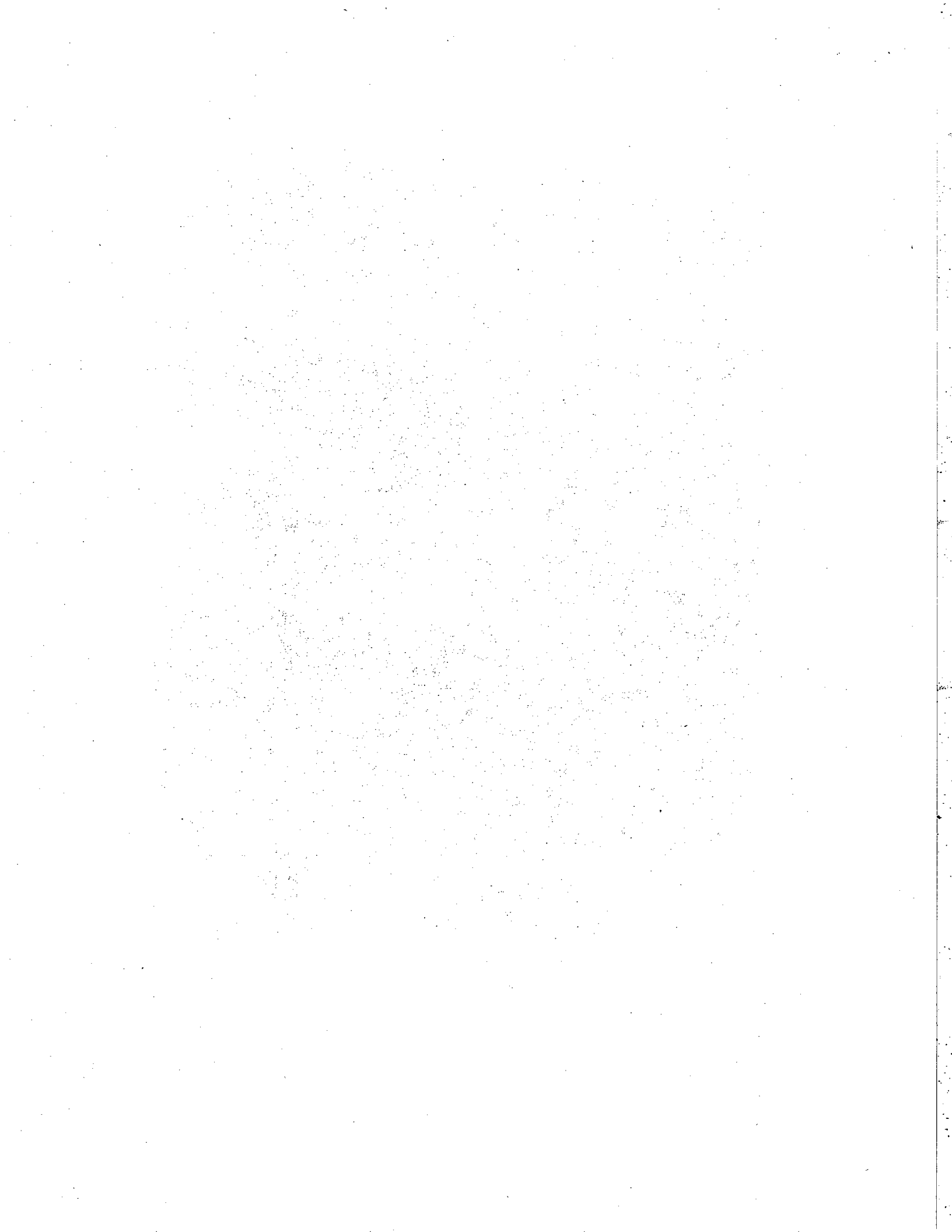
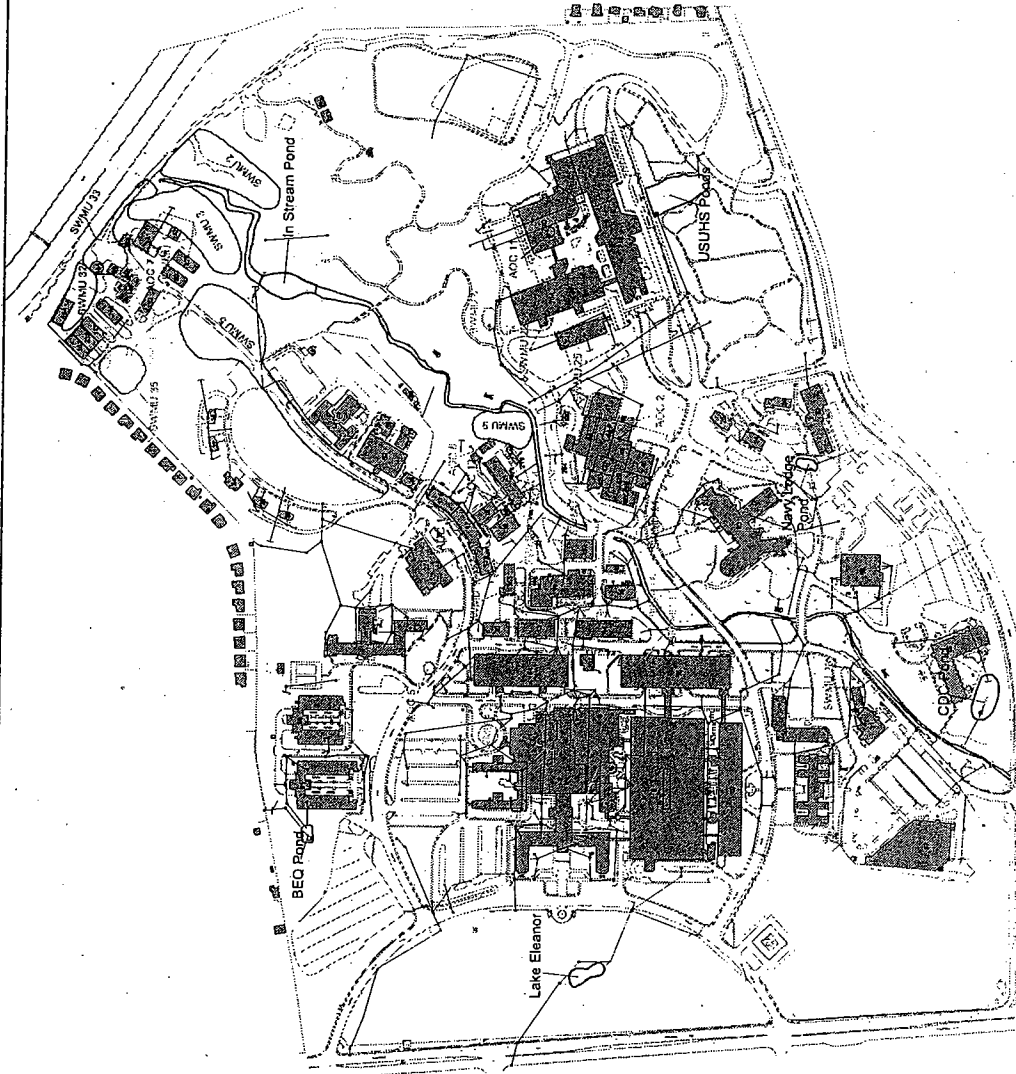


Figure 1-1  
 Facility Location Map  
 RCRA Facility Investigation Report  
 National Naval Medical Center, Bethesda, Maryland



**SWMU and AOC Descriptions:**

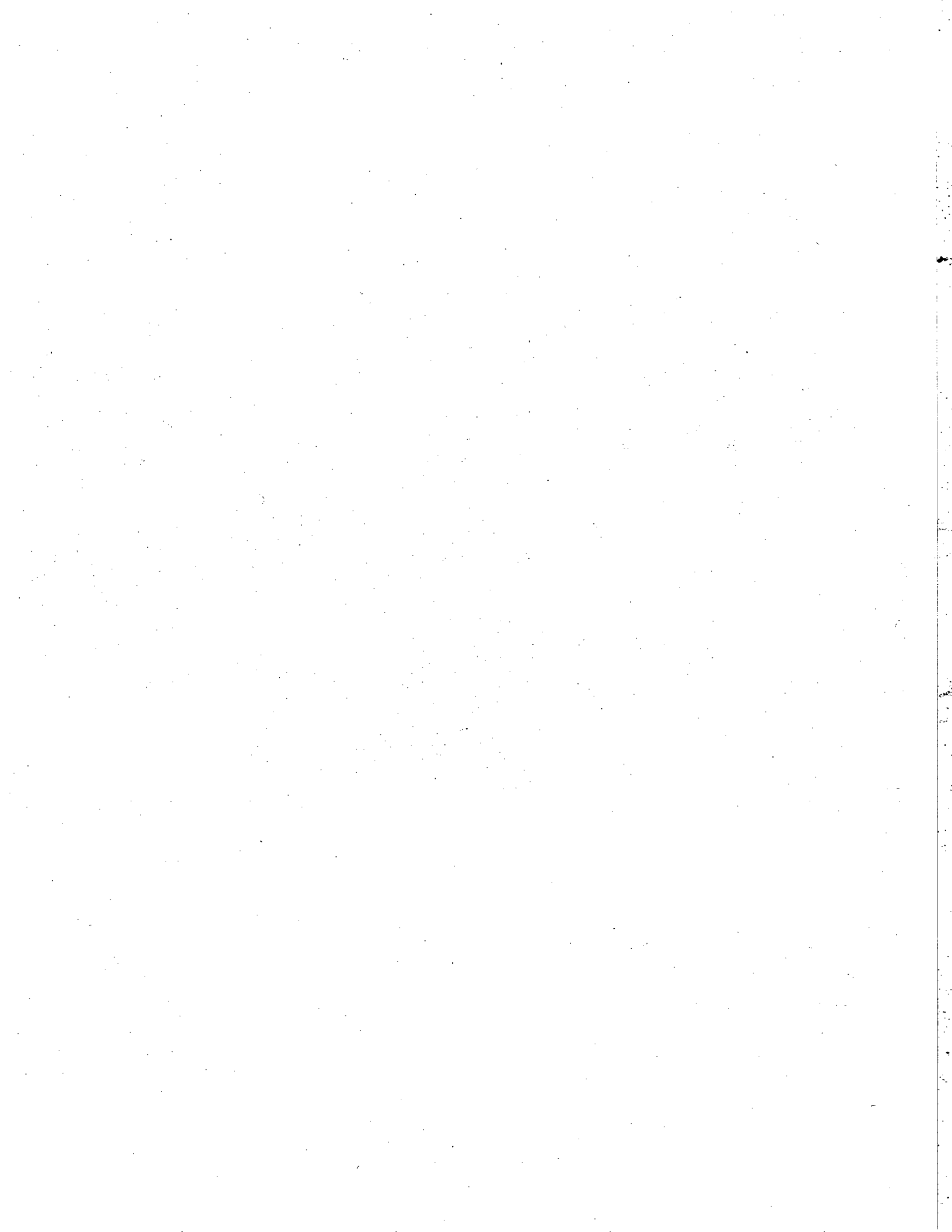
- SWMU 1: Building 259 Storage Facility
- SWMU 2: Building 259 Storage Facility
- SWMU 3: Ammunition Laboratory Waste Disposal Unit
- SWMU 4: Ammunition Laboratory Waste Disposal Unit
- SWMU 5: Roadside Laboratory Waste Disposal Area
- SWMU 6: Ammunition Laboratory Waste Disposal Unit
- SWMU 7: Ammunition Laboratory Waste Disposal Unit
- SWMU 8: NARS Xylene Disposal Area
- SWMU 9: Ammunition Laboratory Waste Disposal Unit
- SWMU 10: Ammunition Laboratory Waste Disposal Unit
- SWMU 11: Ammunition Laboratory Waste Disposal Unit
- SWMU 12: Ammunition Laboratory Waste Disposal Unit
- SWMU 13: Ammunition Laboratory Waste Disposal Unit
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- SWMU 91: Ammunition Laboratory Waste Disposal Unit
- SWMU 92: Ammunition Laboratory Waste Disposal Unit
- SWMU 93: Ammunition Laboratory Waste Disposal Unit
- SWMU 94: Ammunition Laboratory Waste Disposal Unit
- SWMU 95: Ammunition Laboratory Waste Disposal Unit
- SWMU 96: Ammunition Laboratory Waste Disposal Unit
- SWMU 97: Ammunition Laboratory Waste Disposal Unit
- SWMU 98: Ammunition Laboratory Waste Disposal Unit
- SWMU 99: Ammunition Laboratory Waste Disposal Unit
- SWMU 100: Ammunition Laboratory Waste Disposal Unit
- AOC 1: Mercury Removal Activity in Building 17
- AOC 2: Building 42 Basin #1 US 9
- AOC 3: Building 42 Basin #2 US 9
- AOC 4: Building 42 Basin #3 US 9
- AOC 5: Building 42 Basin #4 US 9
- AOC 6: Building 42 Basin #5 US 9
- AOC 7: Building 259 Perennial Soil
- AOC 8: Building 259 Perennial Soil
- AOC 9: Building 259 Perennial Soil
- AOC 10: Building 259 Perennial Soil
- AOC 11: USNS Hospital Center Runoff
- AOC 12: Basin 5 Shelby Sewer Outfall of Buildings 17, 18, and 21



**LEGEND**

- Priority I SWMUs and AOCs (Including interim measure at AOC 1 and AOC 12)
- Priority II SWMUs and AOCs
- Priority III SWMUs and AOCs
- Priority IV SWMUs and AOCs
- Surface Water Bodies
- Storm Water System and Outfalls (Priority III SWMU 23)
- Buildings

Figure PMP-1-2  
SWMU and AOC Locations  
Priority II RFI PMP  
National Naval Medical Center  
Bethesda, MD  
**CH2MHILL**





## ATTACHMENT BB

### EPA RESPONSE TO COMMENTS

One set of comments was received during the forty five (45) day public comment period. All comments received were in regard to the Draft RCRA Corrective Action Permit (CA Permit or Permit). No comments were received on the Statement of Basis. The comments that were received were from Brian Wallace of Naval Support Activity (NSA) Bethesda. Comments and EPA responses are listed below:

**Comment #1:** Part I.B. 13 e -With regard to twenty-four hour reporting for noncompliance, how is this to be reported? Call, email or letter?

**EPA Clarification:** According to 40 C.F.R. § 270.30(l)(6), the reporting is to be done orally. No change in the permit language is required.

**Comment #2:** Part I.E.1 – This permit authorizes only the management of hazardous waste expressly described in the permit, how if at all does this affect the Large Quantity Generator Permit that exists at the facility?

**EPA Clarification:** The CA Permit does not change any other permit that the Facility has or its obligations as a large quantity generator of hazardous waste.

**Comment #3:** Part I.G.1 - The Navy and EPA discussed changing the permit to five (5) years what happened.

**EPA Response:** EPA agrees with this comment. The CA Permit will be effective for 5 years as stated on page iii of the Permit.

**Comment #4:** Part II – We need more than a general acknowledgement that we have already met some of the requirements of this permit. If we have completed a particular task for all sites then the task should not be included in the new permit. Perhaps EPA could add a permit history detailing the completed tasks or note it in the accompanying fact sheet. There are few CFR rules for this type of document, EPA mostly uses its own guidance which should enable flexibility.

If we have completed a requirement for some sites but not all, then I would like to see the requirement qualified with a cross reference such as “<<requirement X must be completed >> for all AOC and SWMU listed in Appendix X”

**EPA Response:** EPA agrees with the comment. Attachment CC has been added to the Permit to document the current status of each Solid Waste Management Unit (SWMU)/Area of Concern (AOC).

**Comment #5:** Part II A.5 - See comment #4 above. An agreement of what has been completed needs to be reached. This language seems to suggest we have to resubmit the already approved work for re-approval, which could always be denied...

As discussed on the telecom we want to make sure that we are given proper credit for the work that was previously completed.

**EPA Response:** See Response to Comment 4 above.

**Comment #6:** Part II B.1- This is where we can insert the specificity the Navy is looking for above. Suggest the referenced Attachment B only include the SWMU/AOCs that are NOT listed for “no further investigation or cleanup” in the Statement of Basis. If appropriate, suggest adding a sentence that RFI workplans have been submitted/approved/completed for the SWMC/AOCs listed in Appendix X. Each task listed below should specifically note the sites where the task has been completed and has not been completed.

**EPA Response:** See Response to Comment 4 above. Additionally, Attachment B includes only the SWMUs/AOCs that were not completed at the time that the Statement of Basis was issued.

**Comment #7:** Part II.B. 6b. - We have been submitting status reports every two months for several years at significant cost to the taxpayers. The Navy suggests quarterly reports along with the continuation of monthly calls to convey site status.

**EPA Response:** EPA agrees with the comment. The Permit language has been revised accordingly.

**Comment #8:** Part II.C.3 - Please clarify this sentence. Does sentence refer to schedule for completing initial study phase only? Or schedule for completing acts to implement study recommendations? 90 days doesn't seem like enough time to go through all the necessary steps outlined before.

**EPA Clarification:** The 90-day deadline applies to the submittal of the Corrective Measures Study (CMS) Plan, which must include a schedule to complete the planned work. Further, the Permit provides the Permittee the opportunity to request extensions of time to complete tasks specified in the Permit.

**Comment #9:** Part II D.2a - We cannot secure funding within 90 days. We are tied to the congressional budget cycle. Further, it takes 90 days to execute a contract. Not sure how to address, but as written we are pretty much signing on to a non-compliance.

**EPA Response:** The 90-day deadline applies to the submittal of the Corrective Measures Implementation (CMI) Plan, which must include a schedule to complete the planned work. Further, the Permit provides the Permittee the opportunities to request extensions of time to complete tasks specified in the permit.

**Comment #10:** Part II F.1 - How do these requirements fit in with NCP process for new releases and the process for responding to new releases set forth in any facility-specific response plans? This proposed process seems fine for newly discovered past releases of hazardous materials.

We are bound by the requirements set forth in the NCP.

**EPA Response:** This requirement is to ensure EPA is informed in a timely manner of any releases. The Navy can submit the information on the release used to comply with the NCP process to meet this requirement.

**Comment #11:** Usually I believe the timeframe is 7 yrs. Further, where shall the records maintained? Onsite? Iron Mountain, contractor?

Indefinitely?

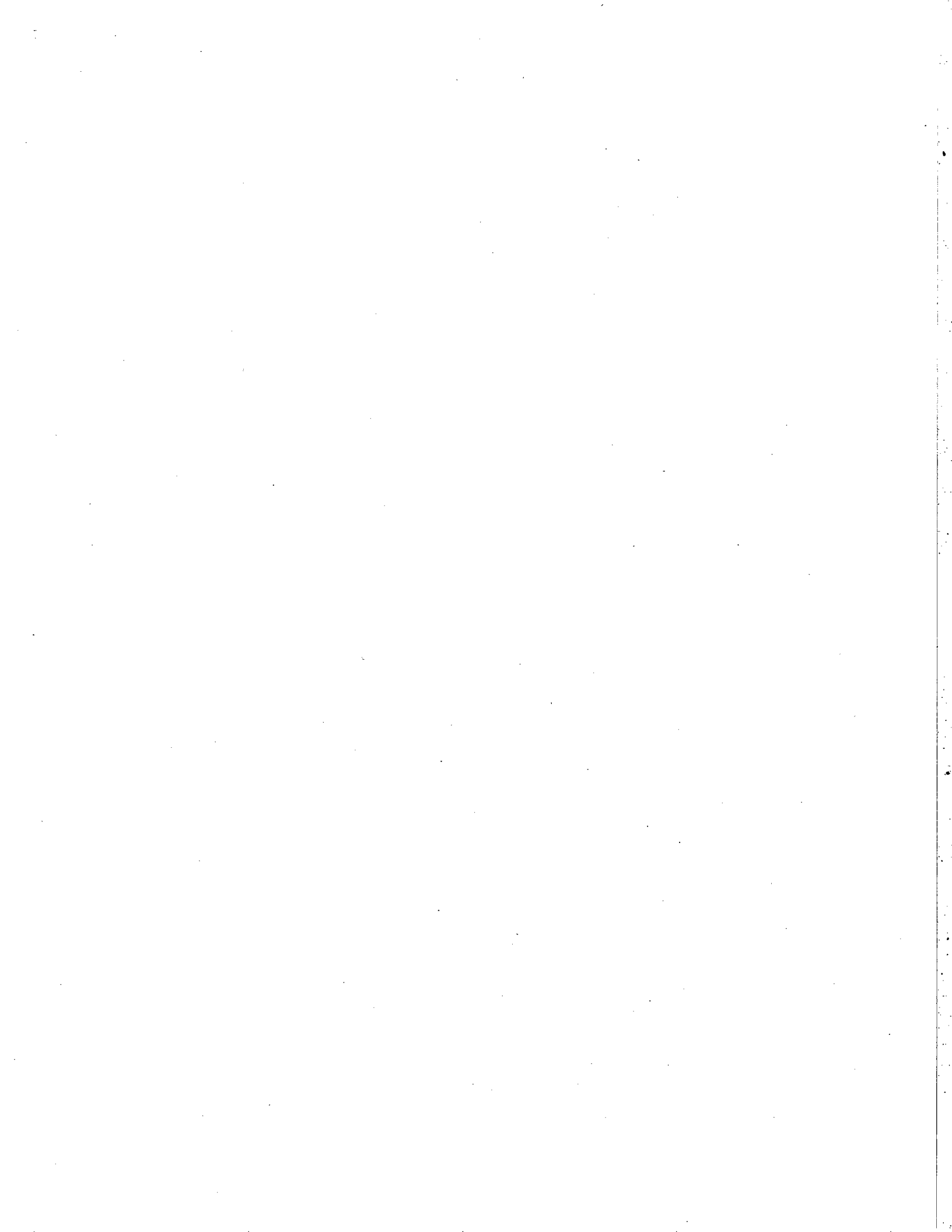
**EPA Response:** All documents should be retained until the conclusion of the investigation and a final EPA determination that all remediation at the Facility is complete. Documents should be maintained at the Facility until the closure of the Permit. After the Permit closure, NSA may request that they no longer be required to maintain documents.

**Comment #12:** Part II J - Suggest "traceable correspondence"  
Ten (10) days is light speed for the Navy, Suggest amending to 30.

**EPA Response:** Notification by overnight mail (UPS, Fed Ex) is acceptable when registered mail is required. The Navy can request an extension for any deliverable.

**Comment #13:** SWMU #17 Military Gas Station Waste Oil Tank should be added to Table 1 of the Statement of Basis, as there is no evidence of a release at this site.

**EPA Response:** EPA disagrees. EPA is intentionally retaining SWMU #17 as part of the Permit until a determination on how groundwater will be handled for the entire Facility is made.



Attachment CC

SWMU/ AOC	Description	Work Completed to Date	Current Status
SWMU 1	Bldg 256 Storage Facility	Wipe sampling (SWMU floor) and subsurface soil sampling were performed during the Priority III RFI field event.	NSA will provide EPA with documentation for encapsulation and building use
SWMU 2	Former Laboratory Waste Disposal Area	A radiological survey, geophysical survey, surface and subsurface soil sampling, monitoring well installation, groundwater sampling, and monitoring well slug tests were performed during the Priority I RFI field event. Additional surface debris removal activities were completed in 2013.	NSA to request SWMU location to be moved over, technical memo will be submitted for add'n work
SWMU 3	Asbestos Burial Area	A radiological survey, geophysical survey, surface and subsurface soil sampling, monitoring well installation, and groundwater sampling were performed during the Priority I RFI field event.	EPA to review Master Plan
SWMU 17	Military Gas Station Waste Oil Tank	Subsurface soil sampling was performed during the Priority III RFI field event.	GW investigation to be completed with sitewide GW investigation
SWMU 20	AFRRJ Mixed Waste Underground Storage Tanks	A radiological survey and surface/subsurface soil sampling were performed during the Priority II RFI field event. A Work Plan documenting the planned additional investigation activities at SWMU 20 has been submitted and approved by the USEPA.	EPA to review 3/22/13 Tech Memorandum – add'n work proposed
SWMU 22	Uniformed Services University of the Health Services Scintillation Fluid Disposal Facility	Wipe sampling was performed during the Priority III RFI field event. Additional information associated with the response to USEPA comments on the Draft-Final RFI Report for SWMU 22 was submitted in a technical memorandum.	EPA to review March 28, 2013 Tech Memorandum
SWMU 23	Storm Sewer System	Surface water and sediment sampling was performed during the PI RFI field event. A BERA and SERA were prepared based on the results of the RFI sampling and submitted to the USEPA. Revised versions of both documents addressing USEPA comments were submitted to the USEPA in August 2013.	Navy to segment stream into separate units based on SERA/BERA
SWMU 32	Metal Storage Yard	A radiological survey, geophysical survey, surface and subsurface soil sampling, monitoring well installation, groundwater sampling, and monitoring well slug tests were performed during the Priority I RFI field event. A removal action to remediate PCBs in soil and investigate a subsurface anomaly was performed in December 2012.	EPA to review 4/11/13 Tech Memorandum – results of soil excavation and confirmation sampling
SWMU 33	Million Dollar Hill	A radiological survey, geophysical survey, surface and subsurface soil sampling, monitoring well installation and groundwater sampling were performed during the Priority I RFI field event. A removal action to remediate PCBs in soil was performed in December 2012.	EPA to review 4/11/13 Tech Memorandum – results of soil excavation and confirmation sampling

SWMU/ AOC	Description	Work Completed to Date	Current Status
SWMU 35	Debris Disposal Area Near Buildings 147 and 239	A geophysical survey and subsurface soil sampling were performed during the Priority III RFI field event. A Work Plan documenting the planned additional investigation activities at SWMU 35 has been submitted and approved by the USEPA.	EPA to review 3/22/13 Tech Memorandum – add'n work proposed
AOC 2	Bldg 42 UST and Bldg 53 UST	A geophysical survey and subsurface soil sampling were performed during the Priority III RFI field event.	EPA to review Land Use Controls/Base Master Plan info submitted by NSA
AOC 3	Removed UST	A geophysical survey and surface/subsurface soil sampling were performed during the Priority III RFI field event.	EPA to review MDE UST program regulations to determine if unit can be handled under that program - Closure proposed
AOC 5	Bldg 188 UST	A geophysical survey and surface/subsurface soil sampling were performed during the Priority III RFI field event.	EPA to review MDE UST program regulations to determine if unit can be handled under that program - Closure proposed
AOC 6	Power Plant Spill	Surface and subsurface soil sampling were performed during the Priority II RFI field event.	EPA to review 4/2/13 Closure plan from 6/5/96 submitted
AOC 11	USUHS Hydraulic Fluid Spill	Surface and subsurface soil sampling, monitoring well installation, and groundwater sampling were performed during the Priority I RFI field event.	NSA will submit map of storm drain, EPA hydro review needed