

FINAL DECISION AND RESPONSE TO COMMENTS  
United States Army, Fort A.P. Hill Facility  
Bowling Green, VA  
RCRA ID: VA 221 002 0416

**I. FINAL DECISION – Monitored Natural Attenuation with Institutional Controls**

The United States Environmental Protection Agency (EPA) has selected Monitored Natural Attenuation and Institutional Controls as the Final Remedy for the United States Army (Army), Fort A.P. Hill (Fort A.P. Hill) facility in Bowling Green, Virginia (hereinafter referred to as the Facility).

Natural attenuation refers to a system where a variety of physical, chemical, or biological processes act without human intervention to reduce the mass, toxicity, mobility, volume, or concentration of contaminants in soil or groundwater. Monitored Natural Attenuation, a component of the Final Remedy, refers to the act of collecting samples to “monitor” the natural attenuation process.

Because contamination will remain in the groundwater and soil at the Facility, EPA has also selected institutional controls as a component of the Final Remedy. Institutional controls are non-engineered instruments such as administrative and/or legal controls that minimize the potential for human exposure to contamination by limiting land or resource use. The required institutional controls are:

- a prohibition on the access and use of groundwater in the unconfined water table aquifer within areas hydrogeologically connected to areas of concern (AOCs) and solid waste management units (SWMUs) for any purpose other than environmental monitoring and testing;
- a prohibition on the development and use of any AOC and any SWMU for residential housing, elementary and secondary schools, child care facilities, and playgrounds;
- a prohibition on earth moving activities in landfill areas, SWMUs 11, 12, 13, 14, 15, 16, 17, 18, 19, and 20, to prevent contact with or exposure to waste materials remaining in place;
- a written notification to EPA in the event Fort A.P. Hill intends to sell part or all of the Facility, forty-five (45) calendar days prior to any such sale, and a demonstration that the prospective purchaser is aware of the restrictions placed on land and groundwater use; and
- a written notification to EPA and Virginia Department of Environmental Quality (VDEQ) forty-five (45) calendar days in advance of any proposed land use changes that are inconsistent with land-use control objectives or this Final Decision.

Fort A.P. Hill has already incorporated these restrictions and requirements into the Base Installation Master Plan, instructions, and orders used by the Commanding Officer to govern conduct, action, and activities on the Facility. If necessary, EPA will also require the ICs to be implemented through an enforceable mechanism such as an order, permit or environmental covenant.

## II. PUBLIC COMMENT PERIOD

On September 15, 2010, EPA issued a Statement of Basis (SB) which summarized the information gathered during the environmental investigations at the Facility and proposed Monitored Natural Attenuation with Institutional Controls as the Final Remedy. Consistent with public participation provisions under the Resource Conservation and Recovery Act (RCRA), EPA requested comments from the public on the proposed remedy as described in the SB. The commencement of a thirty (30)-day public comment period was announced in the local Star Ledger newspaper on September 15, 2010. The public comment period ended on October 15, 2010. EPA did not receive any comments. The SB is hereby incorporated into this Final Decision and Response to Comments (Final Decision) by reference and made a part hereof as Attachment A.

## III. LEGAL AUTHORITY

EPA is issuing this Final Decision under the authority of the Solid Waste Disposal Act, as amended by RCRA and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

## IV. DECLARATION

Based on the Administrative Record which contains the documents, reports and correspondences of the Corrective Actions at U.S. Army, Fort A.P. Hill, EPA has determined that the Final Remedy selected in this Final Decision, which incorporates the SB attached hereto as Attachment A, is protective of human health and the environment.



Abraham Ferdas, Director  
Land and Chemicals Division  
U.S. EPA Region III

11/24/10

Date

Attachment A: Statement of Basis dated September 15, 2010

