

## **Appendix K**

### **Summary of Proposed Cleanup**

Prior to the development of the site-specific Cleanup Action Plan (CAP) a Comprehensive Site Assessment is proposed. The work plan for this effort is attached. It is expected that the work plan will be reviewed and approved (with modifications) by the VCP staff.

The CAP will be developed for the project in accordance with the VCP. The CAP will discuss in detail the technology(ies) proposed for remediation of impacted media (including a discussion of selected criteria for choosing proposed method over other potential remedial options). The CAP will identify, describe and evaluate potentially applicable technologies that are capable of remediating the site, based on the proposed time lines. It will also evaluate the positive and negative aspects of each option from the standpoint of technical merit, its ability to be implemented, economic and temporal feasibility, and immediate/future beneficial results. As part of this process the following will also be addressed:

- The physical and chemical characteristics of the regulated substance, including its toxicity, persistence, and potential for migration;
- The hydrogeologic characteristics of the facility and the surrounding area;
- The proximity, quality, and current and future uses of nearby surface water and groundwater;
- The potential effects of residual contamination on nearby surface water and groundwater;
- An exposure assessment; and,
- The estimated timetable for completion of the remediation.

It is probable that the VCP participant will select mass excavation as the preferred cleanup action.

The following District of Columbia regulatory requirements are typically imposed on the VCP participant for managing impacted soils and groundwater during construction activities. Specifically, the VCP participant will be responsible for the following:

- Soil excavation at the site shall be monitored by an environmental technician using an approved field detection device. An approved methodology will be developed to assign site-specific field readings establishing the primary protocol to classify excavated soils as either “clean” or “impacted”. Sampling and analysis will be conducted at regular intervals of the soils excavated and classified as “clean” in order to ensure that the screening criteria remains valid. On-site testing of “clean” and “impacted” soil may be instituted by the Developer or Responsible Party, however, field testing results will be quality checked by submitting samples to the laboratory for confirmation testing.

- Excavation of soils will be addressed based on the currently available data indicating areas of known soil contaminant concentrations. The site will be sectioned into areas assigned a status of “no impact identified” and “impacted soils identified”. Field conditions of the excavated soils and materials to be excavated will be scrutinized to ensure the characterization assumptions are correct. As stated above, a field protocol will be developed using accepted methods of screening and comparison to determine parameters used in the field determination.