

Remedial Investigation Work Plan, Anacostia River Sediment Project, Washington DC

| Number | Commenter/ Representative | Organization | Type | Section/Table/Figure Nos. | Page No. | Comment | Response |
|--------|---------------------------|---|---------------------|---------------------------|----------|--|---|
| 1 | William Matuszeski | Anacostia Watershed Citizens Advisory Committee | Environmental Group | 3.1.2 | 24 | The discussion of Sources does not seem to treat the re-suspension of in situ legacy sediments as a source of the toxics under investigation. It may well be that a major source of the toxic sediments in any one place is deposition of these resuspended toxic materials after they have been stirred up by storms, dredging or other events. While the extent of this source and the nature in which it delivers these toxics is difficult to determine, it is important to establish its relative contribution as a source. | The re-suspension and re-deposition of sediments is expected to occur during storm events and is a secondary source of sediment contaminants. The relative significance of this process is difficult to quantify and would vary from storm to storm. Although the concentration distribution in sediments is expected to change in response to these processes over time, the sampling approach presented in the RI Work Plan will provide the data needed to support an effective feasibility study. |
| 2 | William Matuszeski | Anacostia Watershed Citizens Advisory Committee | Environmental Group | 2.6 | 10 | The discussion of Ongoing Activities should include a detailed discussion of the current effort by EPA and DCDOE to develop a new Total Maximum Daily Load for toxics in the Anacostia. Some of the monitoring and investigative efforts being carried out as part of the TMDL development could be useful to the RI and the FS. Furthermore, the TMDL should be identifying sources of the toxics and the resuspension of existing sediments bearing toxics may be a pathway. Ultimately, the Wasteload Allocation developed under the TMDL should be integrated with the remediation plan resulting from this RI/FS, and the desire and commitment to do that should be included here. | DDOE is engaged in an effort to characterize the tributary mass loadings of the key contaminants that are present in the river sediments. Given the complexities involved, that effort will be conducted independent of the RI and will consider previous and ongoing EPA efforts to develop new TMDLs for the Anacostia River. DDOE believes that sediment sampling results can help define goals for the TMDL program, which is separate and distinct from the RI. An appropriate role for the RI is, therefore, to make appropriate recommendations regarding TMDL monitoring priorities. Since any such recommendations must await the performance of field sampling for the RI and associated analysis and reporting, the RI report is the appropriate venue for indicating any such recommendations. No changes will, therefore, be made in response to this comment. |
| 3 | William Matuszeski | Anacostia Watershed Citizens Advisory Committee | Environmental Group | 3.1.5 and 3.1.6 | 31-32 | While the dominant transport medium may be downstream migration, as stated in 3.1.5, it is important to understand the extent to which the tidal Anacostia transport system for sediment is chronic versus event-driven. A system that is storm-event driven will obtain a larger share of its loadings from the disturbance of insitu sediments and from bank erosion. In contrast, if the movement is ongoing and not particularly variable with storm events, it may be easier to evaluate the rates and levels of material transport. The monitoring being done | Comment acknowledged. As noted in the response to Comment #1, the sampling approach presented in the RI Work Plan will provide the data needed to support an effective feasibility study. |
| 4 | William Matuszeski | Anacostia Watershed Citizens Advisory Committee | Environmental Group | 3.1.2 | 24 | The discussion of Sources suggests that there may well continue to be toxic loadings entering the system from upstream tributaries, including the Northeast and Northwest Branches and Lower Beaverdam Creek. Since these are all in Maryland, it is important to indicate in the Workplan how and how soon DOE will be engaging county and state officials to assure timely consideration of data needs and ultimately remedies. | As noted in the response to Comment #2, DDOE is engaged in an effort separate from the RI to characterize the tributary mass loadings of key tributaries including Northeast Branch, Northwest Branch, and Lower Beaverdam Creek. Section 3.1.2.2 will be revised to indicate that DDOE is in the process of exploring with the Maryland Department of the Environment and other governmental entities strategies for evaluating the loadings of contaminants to the Anacostia River via tributary inflows. |
| 5 | William Matuszeski | Anacostia Watershed Citizens Advisory Committee | Environmental Group | 10 | 95 | It is essential that the schedule for the RI /FS be revised to reflect the delays caused by non-professional reviews within the DC Government. Once that is done, the new schedule should include no time for such unnecessary reviews in the future and should set out an achievable set of dates. Efforts should be made to warn potential permit authorities of the anticipated need for permits as well as the importance of efficient handling of permit applications. In the past this has been a problem, especially with the National Park Service. | DDOE is taking and will take all reasonably necessary steps to ensure efficient administration of reviews associated with the Anacostia River sediment project. Additionally, DDOE and Tetra Tech are frequently in contact with all permitting authorities to ensure permit approvals are as expedited as possible. |
| 6 | Beth McGee | Chesapeake Bay Foundation | Environmental Group | Section 1.1 Objectives | 1 | The Objectives are not well-aligned with the purpose of the study as outlined in the DDOE scope of work which is as follows: "The purpose of this statement of work (SOW) is to identify the existing sources of sediment contamination in the Anacostia River, to evaluate the nature and extent of contamination in the sediments in the tidal portion of the Anacostia River and conduct feasibility study to develop and evaluate potential remedial actions to eliminate unacceptable risk to human health and the environment." and includes developing monitoring plans for outfalls and other sources. There is no mention of monitoring in the workplan. | Section 1.1 will be revised to discuss the alignment of Work Plan objectives with the objectives indicated in the Statement of Work (SOW). The discussion will note the SOW objectives that are explicitly addressed in the RI versus the SOW objectives that will be addressed in companion efforts. |
| 7 | Beth McGee | Chesapeake Bay Foundation | Environmental Group | ection 4.1 and Table 4.1 | 7 and 3 | The statement that previous sampling in the Anacostia River was concentrated near environmental areas of concern along the banks of the river is not true. The ANS study and McGee et al 2009 were designed to be representative of river conditions. environmental areas of concern along the banks of the river is not true. | The referenced text indicating that Anacostia sediment investigations have been limited to the responsible party (RP) sites will be revised to state that while most studies have focused on the RP sites, several studies have evaluated conditions throughout the tidal river. |
| 8 | Beth McGee | Chesapeake Bay Foundation | Environmental Group | Table 4.1. Step 3 | 39 | The proposed approach includes sampling porewater, subsurface sediments and surface water. The rationale for these analyses is not supported. | Pore water will be collected as a parameter to support the ecological evaluation of shallow sediment conditions and to provide parameters required for feasibility study. In addition, the data will support initial screening for potential zones of groundwater impact to shallow sediment. Table 4.1 and associated text will be revised accordingly. |
| 9 | Beth McGee | Chesapeake Bay Foundation | Environmental Group | Table 4.1 Step 5 | 40 | As noted above, we don't not think subsurface sediment sampling is justified broadly in the river. There will be valuable information from site specific studies that might help determine where additional subsurface samples should be collected, to tie sources with contamination, but a broad scale assessment is not justified and would not be a good use of limited dollars. Porewater is proposed as an indicator of exposure for benthic animals. A more direct measure is to conduct sediment toxicity tests. Hence, we suggest eliminating porewater analysis and conducting more sediment toxicity tests. The addition of benthic macroinvertebrate community analysis would also be appropriate. Lastly, we support limited surface water sampling perhaps to validate water quality models, but because of the variability of water samples and the tidal nature of the system, meaningful information will be difficult to obtain. | The text will be revised as noted above to expand on the discussion of the rationale for the collection of deep sediment and pore water samples. As noted above, pore water is essential for evaluating benthic environmental conditions and for providing parameters required for the feasibility study. Regarding the performance of toxicity testing, the proposed investigations include this testing. We do not believe that additional benthic macro-invertebrate community analyses (over and above what has been done in previous studies) would constitute an efficient approach for the sediment investigation. |

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| 10 | Beth McGee | Chesapeake Bay Foundation | Environmental Group | Table 4.1 Step 5 | 40 | As noted above, we suggest that benthic community analysis be added to the approach and the Sediment Quality Triad approach used in the assessment. This would also allow some comparison to the McGee et al. 2009 study. Similarly, one of the other long-term studies in the rivers is fish health via a vis tumors in catfish. Hence, we would also recommend this endpoint for inclusion in the study. | We agree that benthic community analysis is an informative tool for monitoring sediment quality. The index of biotic integrity (Benthic-IBI) and Sediment Quality Triad are useful tools for characterizing the overall condition of sediment as habitat, and may be incorporated into a natural resource damage assessment at a later date. The remedial investigation (RI) is necessarily focused on assessing the risk posed by currently detected chemical contamination in sediment. However, existing data indicate a poor correlation between benthic community condition and sediment chemistry (McGee et al. 2009), as discussed in Section 4.2.5 of the WP. Furthermore, the benthic community in the Study Area is fairly well-characterized as depauperate and dominated by pollution-tolerant species. As such, additional benthic community analysis is not considered to add substantial value to this phase of the RI. Please see response to comment #60 regarding tumors. |
| 11 | Beth McGee | Chesapeake Bay Foundation | Environmental Group | Table 4.1 Step 7 | 41 | We recommend testing with the amphipod <i>Hyalalella azteca</i> . We also question the merits of analyzing benthic invertebrate tissue concentrations of contaminants. It is very difficult to get sufficient biomass to conduct analyses, so the focus should be on fish analyses. In this regard, if the purpose is to assess ecological risks, then whole fish should be analyzed. It is our understanding DDOE is collecting fish tissue for human purposes, this study could rely on those data, rather than collecting more. | We do intend to use <i>Hyalalella azteca</i> for toxicity tests, as described in Section 5.1.4 of the WP. We appreciate your concerns about benthic invertebrate tissue being difficult to collect. As stated in Section 5.1.5 of the WP, we intend to analyze benthic invertebrate tissue opportunistically, only when adequate volume is available. We are coordinating with the DDOE Fisheries Division to share the fish tissue data being collected to support fish consumption advisories, and will revise our WP to reflect the |
| 12 | David Culp | None | General Public | Section 3.2.2 | 34-35 | This section is short on detail about specific species. As an example, some insects and bird are much sensitive to toxics, but there is no discussion of this. Also, when you named bird species, you omitted the Bald Eagle. This section needs work. | The requested information on species and toxicity profiles will be included in the ecological risk assessment (ERA). Citations to toxicity profiles will be added to the revised WP. |
| 13 | David Culp | None | General Public | Table 3.5 | | Change the coordinates to Maryland State Plane, as other coordinates are. | The coordinates in Table 3.5 will be converted to 1983 Maryland state plane coordinates. |
| 14 | David Culp | None | General Public | Figures 4.2 through 4.15 | | These data figure are hard for the lay person to understand. Could they be heat (color flood) maps like the one below (example provided in original comment)? | Scaled symbols are the most appropriate and efficient way to represent spatially distributed concentration data such as the available data for the Anacostia River sediment concentrations. The data are unevenly distributed and are sparse in many locations. Contour maps and the color flood depictions generated from the contours can be misleading when applied to data sets such as is available for Anacostia River. |
| 15 | David Culp | None | General Public | Section 5.1.5 | 66-67 | The Anacostia suffers from low dissolved oxygen (DO) levels for several days almost every summer. My understanding is that these low DO levels result in the death of most aquatic animals in parts of the river. The plan should better address how it will work around summer die-offs. | If summer die-offs of fish or other aquatic animals are observed during the sampling effort, an assessment of whether or not to continue the sampling of these animals will be made by a qualified biologist. The biologist will consider the distribution and severity (qualitative assessment of the number of impacted animals) of the event among other factors. |
| 16 | David Culp | None | General Public | Section 5.3 | 68 | Same as above. The Anacostia suffers from low dissolved oxygen (DO) levels for several days almost every summer. My understanding is that these low DO levels result in the death of most aquatic animals in parts of the river. The plan should better address how it will work around summer die-offs. | Please see the response to Comment #15. |
| 17 | David Culp | None | General Public | Table 5.2 | | Add a sample location immediately downstream (south) of the Fort Dupont Creek outfall, if there is not one already. Add geographic coordinates for the sampling locations. For example, there is no way to determine where R5-4 and R5-5 are located. | The location noted by the commenter is proposed for characterization. Proposed sample R4-5 is downstream of the Fort Dupont Outfall. The existing analytical results collected by others in this specific area will be used in the evaluation. |
| 18 | David Culp | None | General Public | Table 5.3 | | Add a sample location immediately downstream (south) of the Fort Dupont Creek outfall, if there is not one already. Add geographic coordinates for the sampling locations. | See response to Comment #17. |
| 19 | David Culp | None | General Public | Table 5.4 | | Add geographic coordinates for the sampling locations. | The work plan will be revised to include a table showing the 1983 Maryland state plane coordinates for all proposed sampling locations |
| 20 | David Culp | None | General Public | Section 6.4 | 71 | The Watershed Model should be available to be used by major environmental stakeholders. | DDOE will take this under consideration and will make a related decision at a later date. |
| 21 | David Culp | None | General Public | Section 7.2.1 | 79 | Why was the Green Heron selected as the endpoint for carnivorous birds, rather than say the Osprey? If this is standard ecological practice there should be a reference. The same comment applies for other endpoints. | Receptors to be evaluated in the ecological risk assessment are selected from a list of receptors that are known to occur in the Study Area. Based on professional judgment, we selected species for which the published scientific literature provides adequate data on body size, foraging behavior, diet, home range, and other parameters important to developing a food chain exposure model. The green heron is an appropriate receptor representing fish-eating birds (like the osprey). Its foraging behavior brings it in more direct contact with sediment than the osprey. The green heron also has a lower body weight and smaller home range than the osprey. For these reasons, the green heron is considered a conservative choice of carnivorous |
| 22 | David Culp | None | General Public | Section 8.4.3 | 91 | Why are the potential risks from exposure specifically for children and youth limited to lead? Potential risks specifically for children and youth should be evaluated for other substances. | Potential risks will be evaluated for all substances based on site- and medium-specific sampling results and relevant risk assessment guidance. Lead is evaluated somewhat differently than other substances and for this reason a separate section was generated to specify how lead will be evaluated. Preceding subsections from Section 8.4 explain how risks and hazards will be evaluated for other substances. |
| 23 | David Culp | None | General Public | General | | I agree with United for a Healthy Anacostia River and other environmental organizations that: (1) A thorough and expeditious assessment of river toxics is critical to making the river fishable and swimmable, and the valuable asset our communities deserve; and (2) The cleanup remedy should be selected by 2017 to leverage other cleanup efforts. | DDOE agrees that the path to remedy selection should be pursued as expeditiously as possible. However, given the complexities of this project, the commitment to a specific timeline for remedy selection is inappropriate. |

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| 24 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 1/Section 1.0 | 1 | <p>This paragraph states that the Work Plan is consistent with the DDOE Statement of Work. The opening statement of the Statement of Work reads, "The purpose of this statement of work (SOW) is to identify the existing sources of sediment contamination in the Anacostia River, to evaluate the nature and extent of contamination in the sediments in the tidal portion of the Anacostia River and conduct feasibility study to develop and evaluate potential remedial actions to eliminate unacceptable risk to human health and the environment." Section 2 (Scope) of the Statement of Work identifies 11 specific tasks as bullet points which I have numbered and reproduced below:</p> <ol style="list-style-type: none"> Review existing data of the Anacostia River sediments, including the Conceptual Site Model (CSM) and Tidal Anacostia Model-Water Quality Analysis Simulation Program (TAM-WASP) Model prepared by Anacostia Watershed Toxic Alliance (AWTA); Identify data gaps (including the age and validity of previously collected data) to support the remedial investigation and development and evaluation of remedial alternatives; Develop RI/FS Work Plan and Sampling and Analysis Plan (SAP) to address the identified data gaps; Perform all necessary field work to fill data gaps and support the RI; Update the CSM and TAM-WASP model based on the new data obtained; Based on the new data obtained, determine the nature and extent of contamination in sediments for the tidal portion of the Anacostia River to build on prior investigations; Develop and implement monitoring plan for tributaries, stormwater outfalls and combined sewer outfalls of the lower Anacostia watershed. Monitor and update the status of the Anacostia River advanced capping demonstration site; Prepare a draft remedial investigation report upon completion of field activities; Conduct a focused feasibility study to identify remediation requirements and establish cleanup levels as necessary to eliminate or prevent unacceptable risks to human health and the environment and identify, screen and evaluate potential remedial alternatives Prepare a draft feasibility study report. <p>The Work Plan inadequately addresses Tasks 1, 2, and 5, in that work on the TAM-WASP Model is only mentioned in one paragraph on page 71, with no analysis of the data gaps and data needs for updating the model. On page 71, there are no new data identified or included in the Work Plan for updating the model (i.e., no tributary monitoring to estimate chemical loads). The Work Plan does not address Tasks 7 or 8 at all, despite the fact that section 4.3.1 of the Scope of Work lists specific requirements for these Tasks. The Work Plan should state that Tasks 10 and 11 will be conducted under a separate Statement of Work as it is logical to conduct these tasks after the Remedial Investigation is completed.</p> | The commenter's preference for how the Work Plan addresses the tasks outlined in the Statement of Work is acknowledged. With regard to text revision in response to this comment, please see the response to Comment 6. |
| 25 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 2/Section 1.2 | 2 | The document should cite the regulatory authority for Natural Resource Damage Assessment. | The following citations apply: Code § 8-632.01(b)(4) (allowing the District to recover for "injury to, destruction of, or loss of natural resources, including the reasonable cost of assessing the injury, destruction, or loss resulting from the release of the hazardous substance). 43 C.F.R. pt. 11 (containing prescribed methodologies on how to conduct a CERCLA-based Natural Resource Damage Assessment). 43 C.F.R. §§ 300.600 to 300.615 (trustees for natural resources). |
| 26 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 3/Section 1.4 | 2 | first para: The Service understands that the scope of the assessment is the tidal river as defined in the section. However, for the purposes of collecting data that will allow updating of the Conceptual Site Model (CSM) and the TAM/WASP model it may be necessary to collect samples outside of the tidal river such as at the Northeast and Northwest Branch gage stations. The map (Figure 1.1) includes the lower portions of the Northeast and Northwest Branches. By adding the locations of the gages and changing the text to include those branches up to the gage stations, the matter would be clarified. Perhaps the scope should be expanded to include the tidal portions of all tributaries listed in Table 3.5. | In this comment, the commenter suggests that DDOE expand the boundaries of the investigation beyond the main channel of the Anacostia River, Kingman Lake, and the Washington Channel. DDOE agrees that tributary characterization and cleanup is of fundamental importance in the cleanup of Anacostia River sediments. However, to keep the investigation manageable, the Department elected to define the investigation area as described in Section 1.4. As discussed in the response to Comment #4, Tributary assessment will be performed as a companion effort external to the RI. |
| 27 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 4/Section 1.4 | 2 | last line of para 2: The Service understands the need to avoid duplication. However, a sediment sampling plan should include locations that are within the boundaries of site investigations as well as remote from those sites. Otherwise, the sediment samples will not be collected within the same time frame and, unless all methods are identical, it will be difficult to compare concentrations. For example, if Figure 1.1 is followed exactly, then there would be no sampling within the pink shaded AOC areas, which includes a large section of the river extending from below the Benning Bridge to Kenilworth Marsh. This confusion was resolved after seeing the proposed locations in | Some sampling will occur within the designated environmental cleanup sites to address the issues stated. Results collected by others in these areas will also be used. The referenced text will be revised accordingly. |
| 28 | Fred Pinkney | Fish & Wildlife Service | Federal Government | | | One possible approach, utilized by Velinsky and Ashley (2001) involved a series of sample transects extending the length of the tidal river with 3 samples in the Washington Ship Channel. A similar design using many of the same sampling locations and consistent analytical methods would allow comparisons of the concentration data across time. | Rather than defining sampling locations strictly along transects and with the objective of achieving a representative spatial distribution, the project team used the bathymetric survey results to help guide the selection of sediment sampling locations. The river bottom contours indicate areas of scour and deposition and the extent of specific geomorphic units such as the delta feature formed where a tributary or storm sewer outfall joins the river. The project team performed a geomorphic analysis of the bathymetric data with the objective of mapping each distinct geomorphic unit. The team used the results of this analysis to ensure that sediment sampling targeted all units and that no single unit was over or undersampled. The text will be revised to include a discussion of the geomorphic analysis and its role in defining the proposed sediment sampling locations. |
| 29 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 5/Figure 1.1 | | The legend location for the Washington Ship Channel is incorrect. The abbreviation "AOC" should be defined. The CSX Railroad Bridge should be added. There are two shades of blue but only the light color which is incorrectly defined as "Lake" is in the legend. Tributaries in addition to Little Beaverdam Creek should be highlighted and labeled. The National Arboretum extends to the River and Hickey Run should be highlighted. | Figure 1.1 will be revised in accordingly. |
| 30 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 6/Section 2.2 | 6 | second full paragraph: Rather than citing AWTA (2002), the report should include current information on the frequency of dredging at the Bladensburg Marina. | Information regarding the extent and frequency of dredging to accommodate the Bladensburg Marina will be obtained from the National Park Service and used to revise the dredging discussion in Section 2.2. |
| 31 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 7/Section 2.2 | 6 | third full paragraph: Provide a reference for the USACE citation. | A citation will be provided for the USACE information noted in the comment. |
| 32 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 8/Section 2.6 | 11 | first partial paragraph: Add information on the current status of AWTA and the Anacostia Watershed Restoration Partnership. The current text leads the reader to assume that AWTA is still operating. | The referenced text will be revised to indicate that the Anacostia Watershed Toxics Alliance no longer exists. |

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| 33 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 9/Section 2.6 | 11 | third full paragraph: Delete the first sentence and add the word "surface" before sediments in the second sentence. | The first sentence will be retained because it notes that the ANS 2000 surface sediment investigation was relatively comprehensive relative to the other sediment investigations with data available in the NOAA database. The sentence will be revised so that this information is more clearly stated. Text matching the text described in this comment cannot be found in the document (e.g., the word "sediment" does not appear in the second sentence). |
| 34 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 10/Section 2.6 | 11 | last paragraph: Add the Pinkney et al. (2001) before Pinkney (2009). State that fish tissues were collected for analysis of contaminants in edible tissues to support updating the District of Columbia's fish tissue advisory. Samples were collected in 2000 (Pinkney et al. 2001) and 2007 (Pinkney (2009). Sampling was conducted using boat electroshocking with two areas defined for the Anacostia: Upper Anacostia above the CSX Bridge and Lower Anacostia below the bridge. The text should make clear that these were broad areas that were sampled rather than specific locations. | The WP will be revised as suggested. |
| 35 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 11/Section 2.6 | 13 | first full paragraph: There should be a personal communication added after the sentence that states that the National Park Service has decided to postpone the selection of the final remedy. | The indicated National Park Service citation will be added in accordance with this comment. |
| 36 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 12/Section 2.6 | 14 | first paragraph: The last sentence should state that results were unavailable as of January 2014. | The text will be revised to indicate that the results of the AECOM investigation of sediments at the Pepco Benning Road facility were unavailable as of the release date of the draft Work Plan for public comment (January 2014). |
| 37 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 13/Section 2.6 | 15 | second full paragraph: Insert the word "total" before PCB in the second to last line. | The WP will be revised as suggested. |
| 38 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 14/Section 2.6 | 15 | last paragraph: Insert the word "total" before PAH in each of the last two sentences. | The WP will be revised as suggested. |
| 39 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 15/Section 2.6 | 16 | last paragraph: Insert the word "total" before PAH in the sentence beginning with "Maximum". | The WP will be revised as suggested. |
| 40 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 16/Section 2.6 | 17 | last paragraph: Insert the word "total" before PAH in the third and fourth sentences. | The WP will be revised as suggested. |
| 41 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 17/Section 2.6 | 18 | first sentence: Clarify the use of the word "inconclusive". | The text will be revised to indicate that a comparison of 1999 to 2009 concentrations was inconclusive with respect to trend. |
| 42 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 18/Section 2.6 | 18-19 | Active Capping Pilot Study summary: The discussion of the Lampert et al. (2013) paper should be expanded to include information on the years when the samples were collected. Also, the last sentence of the first paragraph on page 19 is misleading. There should be a separate range for each depth. | The discussion of the Lampert (2013) publication will be expanded to include information on the years when the samples were collected. In addition, the last sentence of the referenced paragraph will be revised to more clearly discuss the comparison of PAH concentrations in the capped and uncapped areas. |
| 43 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 19/Section 2.6 | 22 | Deep Sediments and Data Validation sections: Replace "was" with "were" when the subject is "data" which is plural. | The WP will be revised as suggested. |
| 44 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 20/Figure 2.1 | | The USFWS Bioavailability study (Pinkney et al. 2003) sampled not four but seven tidal river locations plus stations at the Northeast and Northwest Branch gage stations. Lat and longs are available in the report. | Figure 2.1 will be revised in accordance with this comment. |
| 45 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 21/Figure 2.1 | | The ANS/USFWS Triad Study should be split into two colors. Chemistry was conducted on about 130 locations where as the other two elements of the Triad (sediment toxicity and benthic invertebrates) were analyzed at 20 of those stations. | Figure 2.1 will be revised so that ANS/USFWS Triad Study sediment chemistry locations are differentiated from Triad (sediment toxicity and benthic invertebrates) evaluation locations. |
| 46 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 22/Table 2.2 | | 1. Add the Pinkney et al. (2001) fish tissue study performed for the District Department of the Environment (DDOE). The currently referenced Pinkney et al. (2001) bioaccumulation study is not included in the reference section. It should be listed as: Pinkney et al. (2003). It involved sediment sampling, benthic tissue translocation, and semi-permeable membrane deployment at seven tidal river locations and stations near the Northwest and Northeast Branch gage stations. Samples were collected in 2000. | The studies listed in Table 2.2 are studies for which data exist in the project geodatabase. We will add the Pinkney (2001) reference to the table upon our receipt of the data and associated spatial coordinates for plotting. We will add the Pinkney (2003) reference to the reference section of the document. The Northeast and Northwest Branch locations may fall outside of the project study area. |
| 47 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 22/Table 2.2 | | Two other USFWS studies include sediment, fish, and invertebrate contaminant data from the Kingman Lake portion of the Anacostia. They are: Pinkney, A.E., P.C. McGowan, and D.J. Fisher. 2006. Risk-based monitoring of the Kingman Lake Restored Wetland, Washington, DC. U.S. Fish and Wildlife Service, Chesapeake Bay Field Office, Annapolis, MD.CBFO-C05-02 and Pinkney, A.E., P. Doelling Brown, B.L. McGee, K.N. Johnson, and D.J. Fisher. 2003. Contaminant monitoring in the Kingman Lake restored wetland, Washington, DC. Prepared for Baltimore District Army Corps of Engineers. U.S. Fish and Wildlife Service, Chesapeake Bay Field Office, Annapolis, MD.CBFO-C03-07. The 2006 report includes data from the earlier study. Samplers were collected in 2001 and 2003. An electronic copy of the 2006 report will be attached to these comments. | The two referenced studies will be added to Table 2.2 provided that coordinate data are available for plotting. |
| 48 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 22/Table 2.2 | | An additional USFWS study is the Pinkney, A.E., P.D. Brown, and D.J. Fisher. 2002. Larval fish toxicity studies in the Anacostia River. U.S. Fish and Wildlife Service, Chesapeake Bay Field Office, Annapolis, MD.CBFO-C02-05. Water samples were collected from four locations in the tidal Anacostia in high and low flow conditions. The samples were analyzed for contaminants and were tested for toxicity with fathead minnow larvae. Samples were collected in 2001. | Thank you for providing a copy of the larval fish toxicity study. It will be referenced in the revised WP and added to Table 2.2 provided that coordinate data are available for plotting. |
| 49 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 23 /Section 3 | 23 | first paragraph: First line replace "sediments" with "sediment". | The text will be revised in accordance with this comment. |
| 50 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 24 /Section 3 | 25 | second paragraph: The second from last sentence should delete the words "and disease". A separate sentence should state, "Exposure to carcinogens in sediments and through the food chain results in an elevated prevalence of liver tumors in bottom-dwelling brown bullhead (Ameiurus nebulosus)." | The text will be revised in accordance with this comment. |
| 51 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 25 /Section 3 | 24 | first full paragraph: The second from last sentence states that concentration data are available for benthic tissue. The transplanted clams should not be treated as benthic tissue samples. The only benthic tissue samples that the Service knows of are those collected in the Kingman Lake studies referenced in comment 22. | Thank you for the clarification. The WP will be revised to reflect the appropriate use of the clam tissue data. The referenced text will be revised to indicate that only limited benthic tissue data are available within the study area. |
| 52 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 26 /Section 3.1 | 25 | second paragraph: Change the last sentence to "was started" instead of "will be conducted" since it is now 2014. | The specific text indicated in the comment cannot be found in the document. Assuming that the commenter is referring to the supplemental groundwater investigation at the Kenilworth Park Landfill, the text will be revised to note that this investigation is anticipated to occur in 2014. |
| 53 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 27 /Section 3.2 | 34-35 | The information on fish, birds, and mammals is sparse and poorly documented. Information on the fish, bird, and mammal species inhabiting the Anacostia can be obtained from the District Department of the Environment, Natural Resources Administration, Fisheries and Wildlife Division. | The requested information on species will be included in the ecological risk assessment. |
| 54 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 28 /Section 3.2 | 35 | The second paragraph should also discuss bottom dwelling and feeding fishes such as carp and several species of catfish. The reference to tumors in bottom-dwelling fish (currently in Section 3.3.2) should be moved to this section and updated with information from Pinkney et al. (2013). | The WP will be revised as suggested. |
| 55 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 29 /Section 3 | 35 | This section should not rely entirely on the Syracuse Research Corporation (2000) report but should include updated information with citations. Several specific suggestions are provided in the next few comments. | Thank you for providing additional publications. The WP will be revised to cite additional literature. |
| 56 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 30/Section 3.3 | 36 | first paragraph: The Opinion Works (2012) report on subsistence fishing should be cited (see comment 31). The DDOE Division of Fisheries and Wildlife should be contacted to determine if there are additional relevant data on fish consumption. | The DDOE Division of Fisheries and Wildlife is participating in this RI. The Opinion Works (2012) angling survey was discussed in Section 4.2.5.3 of the WP under a different name; the citation will be revised as suggested. |
| 57 | Fred Pinkney | Fish & Wildlife Service | Federal Government | comment 31/Section 3.3 | 36 | The information on fish tissue contamination should be expanded and better referenced. Such information is available in Pinkney (2009). Information on subsistence fishing can be found in the Anacostia Watershed Society Report "Addressing the Risk: Understanding and Changing Anglers Attitudes about the Dangers of Consuming Anacostia River Fish" available at the AWS website. | The discussion of contaminants in fish tissue will be expanded to incorporate information provided in the suggested reference. |

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| 58 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 32/Section 3.3 | 36 | The second sentence in the first paragraph needs to be clarified. If it is implying that there is less risk in consuming top predators because they move over a wide area, it is a false statement. Comparative concentrations among species are available in Pinkney (2009). | The text does not imply that the larger range of top predators reduces risk, only that larger home range is less tightly correlated with any given contaminated sediment site. The text will be revised to clarify this point. |
| 59 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 33/Section 4. | 37 | second paragraph: The statement that previous sampling has been concentrated near environmental sites where known releases have occurred is misleading. It ignores the Velinsky and Ashley (2001) sediment study and McGee et al. (2009) studies which were large scale, tidal-river wide investigations to characterize sediment chemistry, toxicity, and the status of the benthic community. This statement is repeated in Step 1 of Table 4.1 on page 39. These two studies are based on data collected in 2000 and should be updated as indicated on the second bullet point of Section 4.1.1. | This investigation uses the results of the studies mentioned by the commenter. The text will be rephrased so as not to suggest that sediment sampling is limited to the RP sites. In addition, several of the sample locations from 2000 will be resampled, with additional samples collected to further complete spatial coverage of the project area. |
| 60 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 34/Section 4.1.2, Table 4.1.1, Step 3 | 39 | The Service argues that two additional types of information are needed for Step 3. After the sentence, "Some surface sediments will be tested using laboratory bioassays to assess direct risk to benthic invertebrates." A new sentence should be added stating, "These sediments will also be sampled for benthic community analysis so that the Sediment Triad Approach can be utilized." This is the same approach used in the AWTa investigation conducted in 2000 and summarized in McGee et al. (2009). The second type of data needed is the assessment of the health of the fish, which is distinct from measuring fish tissue contamination. The prevalence of tumors in brown bullheads has been used as an indicator of habitat quality in the Anacostia for 15 years and is currently showing a downward trend (Pinkney et al. 2013). Liver tumors have been linked with exposure to PAHs in the Anacostia (Pinkney et al. 2004). The most current report relies on data from 2009, 2010, and 2011. The Service recommends conducting a new tumor survey in 2014 and 2015 to provide updated data on this indicator as part of effort to achieve the primary goal of the investigation as stated in the first bullet of Step 2 of this table. The third goal—to support information needed in the FS—should be deleted as too vague. For example, there may be small areas of the river where sediment concentrations merit capping as a consideration. Conducting a widespread geotechnical survey of the river to support an FS alternative that is limited geographically would be wasteful of resources. It makes more sense to identify the areas with risk that are to be considered for remediation first before collecting such data to support an FS. | Regarding the addition of benthic community analysis in the RI, please see response to comment #10. We acknowledge the tremendous value of long-term monitoring of tumors in the brown bullhead, and support the continuation of this work by FWS. We agree that this parallel study should continue, and we will incorporate available data on fish tumor incidence into the RI risk assessments. Such a long-term specialty study is outside the range of what is typically considered appropriate for a sediment RI. We understand the reviewer's concern that it may be premature to collect data to support a feasibility study. However, there are cost savings associated with collecting data during the initial mobilization rather than phasing the field effort over several seasons. CERCLA regulations clearly allow conducting the RI and FS in tandem when logistical considerations warrant such an approach. With regard to the issue raised by the commenter with respect to the collection of geotechnical data, the limited geotechnical at this stage is useful to screen technologies and approaches in the FS. Additional geotechnical sampling of smaller, targeted areas may be required. |
| 61 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 35/Section 4.1.2, Table 4.1.1, Step 3 | 39 | The third bullet should clarify whether the bathymetric and utility survey and sediment geotechnical results are new data collection efforts outside of the current investigation or are recent studies that are suitable for the goals of the investigation. | The third bullet of Step 3, Table 4.1 will be revised. The text will be clarified to indicate that the referenced data collection efforts will be performed for the RI. |
| 62 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 36/Section 4.1.2, Table 4.1.1, Step 4 | 40 | The Service argues that the boundaries should be extended to include the tidal portions of all tributaries listed in Table 3-5. Several of the tributaries are included under TMDLs and are identified in the TAMS/WASP model (Behm et al. 2003) as contributing to the loadings of toxic chemicals to the tidal river. The Service understands the rationale for limiting the current investigation to the tidal Anacostia rather than the entire watershed but argues that the tidal portions of the tributaries should be considered part of the receiving system. This addition will not add huge areas to the current boundaries. | Please see the response to Comment #26. |
| 63 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 37/Section 4.1.2, Table 4.1.1, Step 5 | 40 | As stated in comment 34, the analytical approach should include two additional endpoints: benthic invertebrate community sampling and a brown bullhead tumor survey. Analytical approaches for these types of data are available in McGee et al. (2009) and Pinkney et al. (2013). The Service argues that there is no need for collection of fish tissue for human health risk assessment because samples were collected by the District Department of the Environment in the fall of 2013 and are currently being analyzed and will be available later in 2014. The results will provide data on the contaminant concentrations of the primary species consumed by the public. Information on the samples can be provided by Danny Ryan of the District Department of the Environment. If there is evidence that the public is consuming turtles, which may be confirmed by Ryan or others at DDOE or National Park Service, then some turtle tissues should be collected and analyzed for contaminants of concern. EPA (2000) protocols on sampling are available. As noted in comment 54, the Service supports the collection and analysis of several forage fish species for whole body analyses for the purposes of developing food chain models for piscivorous wildlife. To its knowledge, the most recent whole body fish data was that collected by Pinkney et al. (2006) for the risk. | We agree that using the fillet data collected by the DDOE Division of Fisheries and Wildlife in 2013 is an excellent idea. We appreciate your calling this study to our attention and will revise the WP to reflect this change. It was reported in the Washington City Paper that turtles from the Anacostia River are harvested and eaten (Shin 2000). We will revise the WP to incorporate consumption of turtles in the human health risk assessment in accordance with EPA guidance on consumption advisories (EPA 2000). We will also evaluate risk to freshwater turtles based on tissue concentrations to the extent the literature supports such an evaluation. |
| 64 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 38/Section 4.1.2, Table 4.1.1, Step 7 | 41 | The first bullet states that bathymetric and utility surveys will be conducted in and around the investigation areas. Is that limited to the areas near the six site investigations? The second bullet states that tests will be performed with either Hyalella or Chironomus. The Service recommends conducting the Hyalella azteca 42-day test using the latest American Society for Testing and Materials (ASTM 2012) guidance. The number of invertebrate samples analyzed for bioaccumulation should be few (~10 or less) since it is difficult to collect sufficient biomass (see General Comment 2). The cost of these analyses is very high and funds could be better used on toxicity tests and benthic community analyses. | Bathymetric and utility surveys have been conducted throughout the Study Area to accommodate sampling. We will conduct the 42-day test that provides both toxicity and reproductive endpoints using Hyalella azteca as the test organism. Regarding benthic invertebrate tissue analysis, please see response to comment #11. |
| 65 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 39/Section 4.2 | 44 | The PAH data should also be summarized in terms of total PAH, which is commonly used in environmental assessments, including those in the Anacostia (Velinsky and Ashley (2001) and McGee et al. (2009)). | An additional figure depicting total PAHs will be added to the document along with accompanying text discussing the total PAH distribution in the study area. |
| 66 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 40 /Section 4.2 | 44 | The chlordanes data should be summarized in terms of total chlordanes which includes alpha-chlordane, beta (gamma)-chlordane, cis-nonachlor, trans-nonachlor, and oxychlordane. | For the purposes of data summarization in the Work Plan, alpha chlordane was plotted since this isomer was the most frequently reported chlordane in the project geodatabase. As discussed in Section 2 of the Work Plan, all available data was assembled in the geodatabase. The chief source of data was the database maintained by NOAA, itself a compilation of the data from a number of previous investigations. Added to the NOAA database were the data from investigations at the Navy Yard and the CSX Benning Yard fuel spill. Depending on the specific investigation from which the data originated, chlordane was reported variously as alpha chlordane, chlordane, beta chlordane, technical chlordane, and gamma chlordane with some samples reporting multiple isomers. The majority of samples, however, reported only alpha chlordane with the other isomers reported in only 60 to 21 percent samples. Given this distribution of the available chlordane data, |
| 67 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 41 /Section 4.2 | 45 | Chromium: Insert "screening" after BTAG. | The referenced text will be revised in accordance with this comment. |
| 68 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 42 /Section 4.2 | 47-50 | The five cores near the Poplar Point site sampled in 2003 and reported in Velinsky et al. (2011) should be added to the discussion of subsurface sediment. | The text of Section 4.2.2 will be revised to include a summary of the results obtained from the five cores installed by Velinsky (2011) in the sediment investigation he conducted near Poplar Point. |
| 69 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 43 /Section 4.2 | 50 | The surface water chemistry data (4 locations in 2000) described in Pinkney et al. (2002) should be discussed. | The text of Section 4.2.3 will be revised to include a summary of the results obtained from the surface water samples collected by Pinkney (2000). |
| 70 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 44 /Section 4.2 | 52 | The section should also discuss the USFWS clam and semi-permeable membrane device study conducted in 2000 (Pinkney et al. 2003) which investigated 9 sites along the river. | Thank you for the publication comparing semi-permeable membranes to clam tissues as sediment monitoring devices. This information will be incorporated into the revised WP. |
| 71 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 45 /Section 4.2 | 53 | On line 7, it states that no specific sampling locations were noted in the study. This is the case because electroshocking requires the movement of the boat along multiple areas. In addition, fish move so that a specific collection location is not meaningful. The DDOE study design acknowledges that movement by dividing both rivers into two collection zones. | The WP will be revised to reflect this detail about sampling locations. |

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| 72 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 46 /Section 4.2 | 53 | The third paragraph needs to be clarified to point out that Pinkney (2009) did not statistically analyze for differences between 2000 and 2007 results or between the Potomac and Anacostia results because the sample sizes were small. The last sentence should be followed with the statements that the District and states regularly monitor fish tissue concentrations to update their fish tissue advisories. This is often conducted on approximately a 5 year cycle depending on the availability of funding. | The WP will be clarified to state that no statistical analysis of temporal differences in fish tissue concentrations was conducted. |
| 73 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 47 /Section 4.2 | 53 | The fish consumption survey should be referenced as follows: Opinion Works (2012). Addressing the Risk: Understanding and Changing Anglers' Attitudes on the Dangers of Consuming Anacostia River Fish (http://www.anacostiaws.org/userfiles/file/AWS_angling_FINAL_web.pdf). | The citation will be added to the WP, as stated in response to comment #56. |
| 74 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 48 /Section 4.2 | 54 | The heading should be changed to Tumors in Fish. Change the wording of the first sentence to: The FWS surveyed the prevalence of skin and liver tumors in brown bullhead (Ameiurus nebulosus) in the Anacostia River in 2009, 2010, and 2011 (Pinkney et al. 2013). In the fourth sentence change "markedly" to "significantly" and insert "largely" before "rural". Delete the references labelled US Fish and Wildlife Service (2013) and FWS (2013). The liver tumor probabilities for standardized 280 mm Anacostia bullheads in the merged 2009–2011 collections was 42 % in females and 14% in males. Last sentence should read, "Brown bullhead remain in a relatively small area (linear home range of 0.6–2.1 km, Sakaris et al. 2005) and are closely associated with sediment; these traits suggest that contaminants in Anacostia River sediments may contribute to development of liver tumors (Pinkney et al. 2013). | Thank you for providing additional publications. The WP will be revised as suggested |
| 75 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 49 /Section 4.2 | 54 | The McGee et al. (2009) paper is edited from the AWTA report (McGee and Pinkney 2002) and all data are available from Fred Pinkney, USFWS. The paragraph should state that the 20 samples were part of the Velinsky et al. (2001) ANS sediment chemistry survey sponsored by AWTA and that samples were collected in 2000. It should state that chemical and toxicological analyses were conducted on the top 3 to 4 cm of sediments. The summary of this study should also point out that none of the station sediments caused a significant effect on survival and only one station caused a significant effect on growth. The overall conclusion of the study was that there was no clear relationship between benthic community health and contaminant concentrations and the study served as a baseline for future | Thank you for providing additional publications. The WP will be revised as suggested |
| 76 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 50 /Section 4.2 | 56 | second paragraph: The last sentence should read that sediments were sampled with a petite Ponar grab and that the analyses were conducted on the top 3 to 4 cm of several grabs composited from each location. | The WP will be revised as suggested |
| 77 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 51 /Section 4.2 | 57 | An alternative to the suggested phased approach would be to re-survey roughly 1/3 to 1/2 of the ANS sampling locations spread throughout the river to include samples near and remote from suspected sources including tributaries and outfalls. The Service agrees that additional samples would be needed in Kingman Lake and Washington Ship Channel. One or more of the Kingman Lake samples could be located where samples were collected in the Pinkney et al. (2006) study. | In this comment, the commenter suggests an alternative approach for the surface sediment sampling approach. The approach proposed in the Work Plan, however, is preferred because it achieves the objectives of sufficient resampling of the ANS 2000 dataset. In addition, rather than subjectively apportioning the sampling locations based on spatial coverage, the final sample locations are based upon a systematic geomorphic analysis (please see response to Comment #28) of the bathymetric survey data collected in October 2013. |
| 78 | Fred Pinkney | Fish & Wildlife Service | Federal Government | | | The Service recommends conducting the 42-day Hyalella azteca as described in ASTM (2012) and Ingersoll et al. (2014) on a subset of the chemical sampling locations. The locations that are selected for toxicity tests should also be sampled for benthic community analysis so that the Sediment Quality Triad approach can be utilized in a similar manner as was done by McGee et al. (2009). Some of the stations should be the same as McGee et al. (2009) while others should cover Kingman Lake, Washington Channel, and other areas of concern. | Please see responses to comments #10, #11, and #64. |
| 79 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 52 /Section 4.2 | 57 | Subsurface Sediment: It is unclear why limited subsurface data is a major data gap. The authors need to provide a rationale for the need to perform subsurface sampling at most surface sediment samples throughout the study area. Biota will not be exposed to sediments deeper than about 6 inches. If the intention is to compare top 3-4 cm with full ponar depths at selected locations, that could serve to help evaluate risks if sediments are resuspended due to storms. Samples deeper than 6 inches will only be informative in areas considered for removal by dredging. It is unclear why that should be an objective of the current study. | The rationale for the collection of subsurface sediment data is that this data is necessary to support the FS. It should also be noted that DDOE intends to minimize to the extent possible the number of investigation phases that will be required to complete the RI. Consistent with this objective, a comprehensive subsurface sediment characterization effort is included in the RI. This approach is preferred over an alternative design with minimal or no subsurface sampling which would necessarily require one or more subsequent phases to characterize subsurface sediment (and require one or more field mobilizations). |
| 80 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 53 /Section 4.2 | 57 | Sediment Pore Water: The argument for collecting pore water is not convincing and is not supported by a single reference. The assessment of risks to benthic organisms can be directly assessed through whole sediment toxicity tests with Hyalella azteca as recommended in comment 51. One use of pore water that is appropriate is to put in place pore water samplers known as peepers that collect pore water over several weeks (Strayer and Malcom 2012). These samplers could be placed at the locations where the Sediment Quality Triad will be performed several weeks before sampling. The samples could be analyzed for ammonia, pH, and sulfides all of which may be contributing to a poor benthic community. The usefulness of this approach is important in the Anacostia River, where McGee et al. (2009) noted a poor benthic community in 8 of 20 sample locations yet only subtle toxicity in one location. Having these ancillary pore water parameters could help explain results of the Sediment Quality Triad study. The last sentence of the paragraph is unclear. How will pore water data support remedy selection? | Pore water data is needed to support the ecological risk assessment since pore water is an important pathway for contaminant uptake and can have a stronger relationship than bulk sediment concentrations with tissue concentrations and toxicity. In addition, the pore water data will be used for initial screening for potential impacts from contaminated groundwater in shallow sediments. The project team is unaware of any existing pore water data for the Anacostia River. |
| 81 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 54 /Section 4.2 | 58 | The Service disagrees with the widespread collection of invertebrates for contaminant concentrations. The primary reason is that it takes an incredible effort to obtain sufficient amounts of tissue for contaminant analyses. Second, the only use is for food chain modeling, it would be sufficient to obtain a single composite invertebrate tissue sample from each of the 9 river reaches defined in Figure 4.1. The authors should consult Pinkney et al. (2006) for appropriate food chain models, in which green heron diet consisted over sediment (1%), invertebrates (49.5%), and fish (49.5%). In that study, there was insufficient invertebrate tissue available to measure metals as well as organics so that only organics were measured. The Service recommends only measuring organics in the invertebrate samples. The bird food chain modeling for metals can rely on a diet of 99% fish and 1% sediments. | Please see response to comment #11. Numerous food chain models are available to support ecological risk assessment. The food chain models in the suggested references will be considered. |
| 82 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 54 /Section 4.2 | 58 | For whole body analysis, the Service recommends collecting a marsh fish such as a mummichog or killifish from shallow areas, and a larger bottom-dwelling species such as a brown bullhead from deeper areas of the river. Both species have limited home ranges and therefore would allow food chain models to represent different sections of the river. The 9 reaches used for invertebrate sampling would be the areas targeted for whole body fish analyses. Composite samples of two species from each of 9 river reaches would result in 18 whole body fish samples to be used for food chain analyses. | The selection of fish to be analyzed for ecological risk assessment will depend on actual availability of specimens during the field season. We agree in principle with the comment that benthic fishes with small home ranges are desired species. We do not feel it necessary to revise the fish sampling plan for ecological risk assessment presented in the WP. |
| 83 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 54 /Section 4.2 | 58 | No additional fish fillet samples should be collected for human health risk assessment. DDOE (Lucretia Brown, pers. comm.) has contracted USFWS (Pinkney) to analyze samples of multiple fish species that were collected in the fall of 2013. A report of the findings will be available later in 2014. These samples will be current enough to support the human health risk assessment. | Agreed. Please see response to comment #63. |
| 84 | Fred Pinkney | Fish & Wildlife Service | Federal Government | ment 55 /Section 4.2 | 58 | It is unclear why any river-wide or extensive geotechnical data are needed at this point of the study. If capping or dredging are to be considered for a specific area in a later phase of the study, then such data may be necessary. | The geotechnical data collection defined in the Work Plan is needed to screen technologies and approaches in the FS. An extensive data collection effort is planned for the reasons indicated in the response to Comment #79. Further, additional geotechnical sampling of smaller, targeted areas may be required in the design stage |

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| 85 | Fred Pinkney | Fish & Wildlife Service | Federal Government | 56 /Section 5.0 includin | 61 | As noted in comments 51-55, the Service disagrees with the proposed approach and the numbers of samples planned in Table 5.1. In general, it agrees with the approximate number of surface sediment samples but suggests that some would be analyzed for full ponar grabs (approximately 15 cm and some for top 3 to 4 cm of the ponar grab as was done in the Velinsky and Ashley (2001). The Service recommends that no subsurface sediments are needed at this time. If specific areas are to be considered for dredging, those areas would need to be characterized with respect to subsurface sediments. The Service recommends that no contaminant pore water analyses are needed. The Service recommends that only 9 benthic invertebrate samples are needed for contaminant analyses. The Service recommends collecting 18 whole body fish composite samples. The Service recommends no fillet tissue sampling. | Please see the responses to Comments #79, 80, and 81. We acknowledge FWS agreement with the number of surface sediments that are planned. Full Ponar grabs are planned to fully characterize surface sediments consistent with human health and ecological risk characterization data requirements. |
| 86 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 57 /Section 5 | 61-62 | The need for vertical extent of contamination is not justified as part of a riverwide assessment. It would only be needed in areas considered for dredging. Such areas would be identified based on the new round of surface sediment data. Many of the issues regarding the bullet points have already been discussed in comments 51-55. | Please see the response to Comment #79. |
| 87 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 58 /Section 5 | 63-64 | The bulk of the risk to human consumers is through fish consumption. The riverwide sampling design could include near shore stations close to these areas that are used by fishermen, without devoting extra effort to have a more exact estimate. The Service disagrees with the need to collect core sediments from 83 stations. At a later phase, if areas are considered for dredging, it may be necessary to collect a small number of core samples. The bulleted list of analytes is not specific enough. It should include specific chemicals to be monitored, proposed methods, and detection limits. A rationale for dioxins and furans should be provided. AVS/SEM should only be collected at the subset of samples that will be tested for toxicity. Bulk density and Atterberg limits are not needed. | We appreciate the reviewer's focus on fish consumption by humans. However, the human health risk assessment is but one part of the RI. The sampling approach in the WP addresses the broader scope of the RI, which is designed to characterize the nature and extent of contamination, address risk to both human health and ecological receptors, and support decisions leading to remediation of contaminants. The locations for fish sampling were selected to coincide with near shore locations used by fishermen. With regard to the 83 subsurface sampling locations, please see the response to Comment #79. Greater detail regarding the analyte list, including specific chemicals, proposed methods, and detection limits is presented in the Quality Assurance Project Plan. Regarding the need for bulk density and Atterberg Limits (geotechnical analyses), please see the response to Comment #84. |
| 88 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 59 /Section 5 | 64-65 | Pore Water Sampling: There is no need for pore water contaminant analyses. Other pore water analyses are discussed in comment 53. | Please see the response to Comment #80. |
| 89 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 60 /Section 5 | 65 | Sample selection for toxicity testing should not be based on the presence of benthic invertebrates. The Service's recommendations regarding toxicity tests are given in comment 51. The recommendation for benthic invertebrate contaminant analyses are given in | Please see response to comments #10 and #11. |
| 90 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 61 /Section 5 | 66-67 | The Service's comments on the need for benthic invertebrate contaminant analyses are given in comment 54. The Service does not recommend the conduct of laboratory bioaccumulation tests. | No laboratory bioaccumulation tests will be conducted. The text referring to laboratory bioaccumulation will be deleted in the revised WP. |
| 91 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 62 /Section 5 | 67 | The Service recommends collection of <10 water samples for contaminant analysis to support human health risk assessment, primarily from locations where children may be playing at the shoreline. Many of the chemicals of concern are primarily found in sediments. The document should justify which contaminants will be measured in the water column. The primary risk to anglers is through consumption of contaminated fish. The primary health risk from contact with river water is from bacterial contamination. | Please see response to comment #87 regarding the scope of the RI. |
| 92 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 63 /Section 5 | 68 | As stated in comment 54, the Service does not recommend collection of fillet tissues for human health risk assessment. Its recommendations for whole body fish analyses are also given in comment 54. | Please see response to comments #63 regarding fish filets and #82 regarding whole fish. |
| 93 | Fred Pinkney | Fish & Wildlife Service | Federal Government | 4 /Figures 5.1-5.3, Tables 5.1- | | The Service disagrees with the maps of proposed sediment, benthic invertebrate, and fish tissue sampling locations as described in comments 51-55. It regards the Kingman Lake sampling scheme as far too intensive. Statements on the lack of a need for the subsurface sampling and nearly all the benthic tissue analyses are given in comments 51-55. The approach of reviewing the Velinsky and Ashley (2001) transect map and selecting a subset of the sample locations plus adding samples in Kingman Lake and Washington Channel | The DDOE team acknowledges the FWS views on sample density in Kingman Lake. However, the planned sampling density is warranted because of the lack of sediment and other data from this area. |
| 94 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 65 /Section 6 | 69 | The last paragraph states that sampling will compare the 2000 sampling data with the current one at co-located stations to verify the usability of the 2000 data for assessing nature and extent of contamination. The Service argues that a suitable sampling plan involving a repeat sampling of a proportion of the ANS 2000 locations (perhaps 1/3 to 1/2) along with new locations should be the basis for determining extent and magnitude of current contamination. | Please the response to Comment #77. |
| 95 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 66 /Section 6 | 71 | This section provides insufficient detail on the approach to be used to review and update the TAM/WASP model. The Scope of Work states that the TAM/WASP model will be updated based on new data obtained. New data should include monitoring of contaminant loads at the major tributaries rather than simply recalibrating the model based on new sediment data. | Although updating the TAM/WASP model is a task included in the Statement of Work posted on the DDOE website, this task is not included in the investigations covered by the Work Plan. Updating the TAM/WASP model will be conducted as a separate task external to the RI. We agree that data regarding the contaminant loads from the major tributaries will be essential to updating and improving the model. As noted in Comment #26, expanding the study area to include the characterization of the contaminant loads from the major tributaries is not within the scope of this investigation but will be addressed in a separate effort. |
| 96 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 67 /Section 7 | 73 | With the proposed extensive sampling, there is no need to conduct a Screening Level Ecological Risk Assessment. A SLERA is typically conducted early in the process to determine the need for a substantial sampling effort. That decision has already been made. The entire focus should be on a Baseline Ecological Risk Assessment. The authors should look at Ecological Risk Assessments conducted on large river systems such as the Hudson River (TAMS Consultants Inc./Menzie Cura & Associates, Inc. 2000) and the Housatonic River (Weston Solutions 2004) (http://www.epa.gov/region1/geosites/restofriver/reports/era_nov04/215498_ERA_FNL_Vols1-2.pdf). | Thank you for the publications. The comment correctly defines the distinction between a SLERA and a BERA. However, no formal SLERA has been conducted at this site. The SLERA consists of Steps 1 and 2 of the 8-step ERA process (U.S. EPA, 1997, Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments, Interim Final, EPA 540-R-97-006.) |
| 97 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 68 /Section 7.1 | 74 | The assessment endpoints for the BERA (not SLERA) should be divided into those for protection of the benthic invertebrate community, those for the health of the fish community, those for effects on piscivorous birds, and those for effects on piscivorous mammals. Fish health is currently not listed as an assessment endpoint. Fish tumor prevalence, supported by biomarkers of exposure and response, are widely used to monitor the success of remedial activities (see Pinkney et al. 2009, 2013) and fish tumors are listed specifically by EPA Region 5 in their Ecological Risk Assessment guidance (http://www.epa.gov/reg5fuv/ecology/erastep3.html#endpoints). The close linkage between PAH exposure and liver tumors in brown bullheads adds considerable value in the Anacostia assessment where PAHs are chemicals of concern. The statement that adequate protection is at the population level is used out of context. As currently stated, it could excuse all effects that are not supported by a population model. The Service suggests deleting that paragraph. | The assessment endpoints defined for the SLERA are appropriate at this stage. The assessment endpoints may be refined during preparation of the BERA, as warranted by the results of the SLERA. The statement regarding protection of populations versus individuals is important in the context of evaluating risk to common species rather than species protected under the Endangered Species Act (ESA). The assumptions about exposure and the determination of risk differs for common and endangered species. As stated in the WP, the focus is on ensuring the sustainability of the local population rather than on protection of every individual in the population, unless the species is listed under the ESA (please see guidance in EPA [1997]). If this were not the case, risk to each individual largemouth bass would be assessed. Instead, risk to the population of largemouth bass will be assessed. |
| 98 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 69 /Section 7.1 | 75 | The Sediment Quality Triad approach of McGee et al. (2009) should be followed for the BERA. Specific recommendations for tests are given in comment 51. | Please see response to comment #10. |
| 99 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 70 /Section 7.1 | 75 | Few surface water samples are recommended so it is difficult to determine how this measurement endpoint will be used. | The maximum detected surface water concentration of each constituent will be used in the ecological risk assessment. |
| 100 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 71 /Section 7.1 | 76 | Simplified food chain models were used for the Kingman Lake risk assessment (Pinkney et al. 2006). The current model includes surface water, yet no surface water contaminant data are proposed except for those at sites where people fish. | The maximum detected surface water concentration of each constituent will be used in the ecological risk assessment. |
| 101 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 72 /Section 7.1 | 77 | The last paragraph should reference the use of biota sediment accumulation factors which account for lipid in tissue and total organic carbon in sediment. | The ecological risk assessment will use biota sediment accumulation factors as warranted. The text will be revised as suggested. |
| 102 | Fred Pinkney | Fish & Wildlife Service | Federal Government | omment 73 /Section 7 | 78-79 | Comments 68 through 72 apply to the BERA. | Comment noted. |

| Number | Commenter/ Representative | Organization | Type | Section/Table/Figure Nos. | Page No. | Comment | Response |
|--------|---------------------------|-----------------------------------|--------------------|---------------------------|----------|--|---|
| 103 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 74 /Section 8.2 | 87 | The first whole paragraph states that exposure may increase because developments are planned along the river. However, development might reduce exposure because river access could be changed from unsupervised lands to areas with pavement, fences, and greater supervision. | The text states that the human health risk assessment will assume that future exposure is similar to current exposure. The statement that future development may increase exposure will be deleted in the revised WP. |
| 104 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 75 /Section 8.2 | 87 | The last bullet calls for a community survey to determine whether subsistence fishermen are eating whole fish or other parts of the fish than are typically consumed. This seems like a huge effort that will have little effect on the outcome of the risk assessment. As noted in comment 54, DDOE collected fish for tissue analyses in 2013. No new samples are needed and there is no need to collect extra samples for whole body analysis. If based on a literature review, it is known that a percentage of fishermen consume non-standard parts of the fish, whole body concentrations can be estimated from published regression equations such as those of Bevelheimer et al. (1997). In any case, these adjustments would have minor effects on the estimated dose. Instead of collecting additional fish tissue samples, the effort should include a small number of turtle samples if there is evidence of human consumption (see comment 37). | Please see response to comment #63 regarding incorporation of available fish fillet samples into the human health risk assessment and adding turtles to the target species list. |
| 105 | Fred Pinkney | Fish & Wildlife Service | Federal Government | Comment 76 /Section 11 | 97-105 | Numerous corrections are required. All EPA references should start with U.S. Environmental Protection Agency (USEPA). It is confusing now to see the references that start with E listed in the U part of the alphabet. The USEPA references should be listed in chronological order. The references should use initials consistently rather than sometimes using initials and sometimes using first names. The U.S. Fish and Wildlife Service 2013 report should be changed to Pinkney et al. (2013) as shown in the list below. | The references will be revised to consistently refer to the authors initials rather than sometimes using initials and sometimes using first names. The environmental agencies for some states are also named "environmental protection agency." No changes will be made to the reference list with respect to references prepared by the U.S. Environmental Protection Agency (U.S. EPA). |
| 106 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 1.1 | 1 | (This) program needs to consider design to cost concepts. While, of course, a full study is necessary, it should be structured to answer what can be done for each increment of cost -- for the first million, next 5 million or whatever. Put it another way, it needs to identify the priorities geographically and programmatically. That should be the final product. Location of hot spots and overall contamination is useful, but since this is an overview document it should set priorities for funding (and that may be stratified by funding sources). | The discussion the commenter requests will be included in the FS. The Work Plan covers the RI portion of the project. Discussion of costs is premature given that one of the stated objectives of the Work Plan is to generate data to perform the FS. |
| 107 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 1 | 1 | (The) NRDA (discussion) should also refer to (involvement by) NOAA and Dept of Interior. | To the extent practicable, DDOE will incorporate NRDA issues and related work during the remedial investigation and the subsequent feasibility study. However, the Work Plan and the Natural Resources Damage Assessment are separate processes, as mentioned on page 93 of the draft Work Plan. At the appropriate time, other entities and trustees will be consulted regarding NRDA development. |
| 108 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 1.4 | 2 | How wide into terrestrial (flood plain) will samples be collected and they should sample to cover to some extent buffer areas (even if they are impermeable) | The project study area is limited to the tidal river from bank to bank. Sampling and characterization of the floodplain is not within the scope of the RI. DDOE acknowledges that, sampling may be conducted in subsequent investigations as appropriate. DDOE made the decision to focus the investigation on the sediments within the active channel of the tidal river to keep the investigation at a manageable size. |
| 109 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 1.4 | 2 | There would be some benefit in repeating some of the sampling from previous sites in order to provide a positive control for new sampling. | As already discussed in Sections 4 and 5, approximately 20 percent of the ANS 2000 study will be resampled to assess potential temporal trends in sediment quality. |
| 110 | Jon Cooper | University of DC & US Coast Guard | Federal Government | map after 4 | 4+ | cbx fonts and typing how to read or locate | This comment apparently is in reference to the font used for the text on maps, presumably from Section 4. However, the specific intent of the comment is unclear. |
| 111 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 2.2 | 5 | (A good) point to (include in this discussion would be to) present sedimentation rates -- which are covered much later. But would be instructive to give brief contrast here | The point made by the commenter is acknowledged. However, the objective of the referenced text is to note that relatively elevated sedimentation rates have characterized the river since colonial times. As the measured sedimentation rates noted in Section 2.5 represent current conditions in the Poplar Point vicinity and are appropriately introduced in the discussion of Poplar Point, no changes will be made to the text. |
| 112 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 2.5 | 10 | Discuss implications to remediation of hydrodynamics and also the importance of storm events. | Hydrodynamics and the significance of storm events will be considered during the evaluation of potential remedies during the FS. As the focus of the Work Plan is present the proposed sampling locations and supporting rationale, the discussion of site conditions that are of importance, primarily in FS stage, are not necessary. No changes will, therefore, be made to the text. |
| 113 | Jon Cooper | University of DC & US Coast Guard | Federal Government | table 2.5 | | Put in a caption that tells me what you want me to learn from this table -- what is its point or conclusion. | The screening level is referenced in Section 2.7 and a discussion of the purpose of the screening levels is provided in that section. Including that text in the Table 2.5 title would make the title unwieldy and inconsistent with the level of detail provided in the titles of the other tables included in the document. No changes, therefore, will be made to the text. |
| 114 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 3.1.2 | 24 | Excellent -- move or put duplicate upfront in report. | We acknowledge this comment. |
| 115 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 3.1.6 | 32 | (I am) surprised that you are not also referencing or using BASINS from EPA. | As stated on the U.S. EPA web site, Better Assessment Science Integrating Point and Nonpoint Sources or BASINS is a multipurpose environmental analysis system designed to help regional, state, and local agencies perform watershed- and water quality-based studies. The project team is unaware of Anacostia River modeling performed using the BASINS system. |
| 116 | Jon Cooper | University of DC & US Coast Guard | Federal Government | figure 3.2 | | (The) legend needs awtaaac spelled out -- in general figures have a lot of jargon that is hard to navigate | All figures will be reviewed for acronyms that are undefined. All acronyms used on a figure will be defined on the figure. |
| 117 | Jon Cooper | University of DC & US Coast Guard | Federal Government | table 3.2 | | (This table is) excellent. | We acknowledge this comment. |
| 118 | Jon Cooper | University of DC & US Coast Guard | Federal Government | Table 3.4 | | (This table should be) move(d) to an appendix. | Table 3.4 and the accompanying Figure 3.2 provide information regarding storm sewer outfalls. Since these are key inputs to the tidal Anacostia River, Table 3.4 is an important source of information regarding the outfalls and will be retained as a table. No changes will be made in response to this comment. |
| 119 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 4 | 37 | I recommend that you add threshold goals, etc. What are you shooting for? And using CERCLA/RCRA may not be best. On nuclear waste we were satisfied with stabilization. | Section 4 discusses the data quality objectives (DQOs) for the investigation. DQOs are the threshold goals for the investigation in that they concisely define what specific data need is addressed. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) addresses the release of hazardous substances to the environment and applies to abandoned or uncontrolled hazardous waste sites. The CERCLA regulatory framework applicable and the most appropriate regulatory framework for this investigation. |
| 120 | Jon Cooper | University of DC & US Coast Guard | Federal Government | Table 4.1 | 39 | Again, some use of design to cost would be needed. What can you do with first million, etc. of clean up dollars -- also may be stratified by funding sources. | Please see the response to Comment #106. |

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|--------|---------------------------|-----------------------------------|--------------------|---------------------------|----------|--|---|
| 121 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 4.2.7 | 55 | (It is) not clear why these are needed -- what value will these drive and for what purpose; on the surface do not seem essential -- in fact see other comment below | It is unclear what this comment is referring to. Section 4.2.7 discusses data gaps. Such a discussion is essential to this or any environmental investigation. |
| 122 | Jon Cooper | University of DC & US Coast Guard | Federal Government | 11 | 98 | Needs to be redone completely -- they are not full references and in most cases it would be difficult to find the materials again. Or put them on a disk for others to use. | It is unclear what this comment is in reference to. The text noted is the list of publications and communications cited in the Work Plan. This information is essential to include in this or any work plan. DDOE will ensure that the reference list in the work plan is complete. |
| 123 | William Bullard | avy Region Mid-Atlan | Federal Government | General | | Many of the figures and parts of the text depict incorrect information regarding the Washington Navy Yard (WNY) and SEFC (South East Federal Center) which may lead to an incorrect understanding of the river-wide CSM. | Provided the Navy provides feedback on specific text or figures, we will correct any and all inaccuracies. |
| 124 | William Bullard | avy Region Mid-Atlan | Federal Government | General | | In addition to analytical methods and list of congeners to be analyzed for PCB analyses, methods for calculating total PCBs should be specified to ensure comparability with Academy of Natural Sciences (ANS) and WNY data sets. | We will indicate in the work plan how the concentration for total PCBs will be calculated. |
| 125 | William Bullard | avy Region Mid-Atlan | Federal Government | General | | What is DDOE's thinking about the overall approach for remediating the river. Are they adopting the Anacostia Watershed Toxics Alliance (AWTA) overall approach of better source control plus active remediation of hot spots? | The overall approach will be clearer once additional samples are collected and analyzed. The approach advocated by AWTA is reasonable, but other approaches may be required based on data collection and analysis. |
| 126 | William Bullard | avy Region Mid-Atlan | Federal Government | Base Map Figures | | The base map for all of the figures show an inaccurate boundary for the WNY and SEFC, e.g Figure 3.2. They mistakenly increase the boundary of the SEFC west along the river bank to include the property that has historically been owned and operated by DCWASA (pump stations) and the District of Columbia (Public work maintenance yard and former trash incinerator). We understand where this incorrect boundary came from (USGS Quad Maps show this incorrect boundary) but it should be corrected, particularly because this property makes up the shoreline of the most contaminated sediment hot spot. See Figure 1-2 accompanying transmittal of these comments for accurate property boundaries. | We will correct the boundary for WNY to be consistent with the boundary shown in: CH2M Hill, 2011. Operable Unit 2 Remedial Investigation Report, Washington Navy Yard, Washington, DC, prepared for the Department of the Navy Naval Facilities Engineering Command, February 2011. |
| 127 | William Bullard | avy Region Mid-Atlan | Federal Government | Base Map Figures | | The base map also identifies WNY OU2 as an AWTA Area of Concern (AOC), which is not correct. | We will revise the areas of concern (AOCs) shown on the plan documents to correspond to the PCB and PAH AOCs as shown on Figure 7 of the 2009 Anacostia Sediment Capping White Paper. |
| 128 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 1.4 | 2 | It is stated that investigation and cleanup work is underway or contemplated multiple environmental sites bordering the tidal Anacostia River (SEFC among other places). Is this accurate, or is the SEFC work completed? The work plan assumes that each entity conducting cleanup work at an upland site will address sediment contamination in the adjacent portion of the river. | Cleanup work is underway or being contemplated at the sites bordering the river. Beyond the collection of samples to characterize sediments, the project team is unaware of any other characterization or cleanup work in the SEFC vicinity. |
| 129 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 2 & Table 2.2 | 5 - | There are some significant inaccuracies in the dates and investigation histories for the WNY in Section 2 text. The information in Table 2.2 (sample numbers and dates) is correct. | We will revise the text in Section 2 to coincide with the WNY investigation dates provided in Table 2.2. |
| 130 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 2.6.2 | 13 | The workplan states that elevated "lead" concentrations are widespread throughout the groundwater at the WNY. This is not correct. Please remove the word "lead" from this sentence. The FFA Draft Remedial Investigation (RI) for Operable Unit 1 -- July 2004 shows total and dissolved lead concentrations in the groundwater. See Maps accompanying transmittal of these comments. | The referenced text is from Section 3.1.2.1, page 27. The statement that elevated lead concentrations are widespread in groundwater at the WNY was taken from Section 1.3.2, page 1-10 (third bullet) from the following document: CH2M Hill, 2011. Operable Unit 2 Remedial Investigation Report, Washington Navy Yard, Washington, DC, prepared for the Department of the Navy Naval Facilities Engineering Command, February 2011. Assuming CH2M Hill (2011) is correct, no changes will be made to the document. |
| 131 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 2.6.2 | 16 | This section states that the Velinsky cores collected near Popular Point were from the undredged portion of the channel. However, cores 2,3,4, and 5 were collected within the federal navigation channel that was last dredged in the 1980s. See the Popular Point Core Locations Figure and USACE Dredging Fact Sheet accompanying the transmittal of these comments. | The author's indicate that all six cores collected for this study were selected to be "off the main, dredged channel of the river." Assuming Velinsky et al. (2011) are correct in describing where the cores for their investigation were collected, no changes will be made to the document. |
| 132 | William Bullard | avy Region Mid-Atlan | Federal Government | Section & Table 2.4 | 21 | The extraction methods for metals should be specified and should be the same as what was used in the ANS 2000 study to ensure data comparability. ANS 2000 used a strong acid digestion while WNY RI samples were extracted using a weak acid digestion. In addition, ANS 2000 analyzed for 107 congeners (not 88) because some congeners co-eluted. | The extraction methods will be noted in the quality assurance project plan (QAPP) for the RI. |
| 133 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 3.1.1 | 31, 32 | This section indicates that PCB Aroclors are one of the constituents of concern for the riverwide RI. All of the sediment samples will be analyzed for PCB Aroclors, with a subset (20%) to be analyzed for PCB congeners. This raises several questions: * One of the RI objectives identified in Section 4.1.1 is to update the existing data sets -- the largest existing data set is the ANS 2000 river-wide investigation, which only analyzed for PCB congeners. Does DDOE intend to update the river-wide characterization of PCB contamination using primarily Aroclor data? * The Navy agreed to analyze all samples for the WNY OU2 FS Data Gaps investigation for PCB congeners -- primarily at the insistence of DDOE. Will all of the samples that DDOE collects in Reach 2 of the river (between the 11th and Capitol St. bridges) also be analyzed for PCB congeners to supplement the Navy's data? | The discussion in Section 3.1 notes that the constituents of concern (COCs) for the project include all constituents on the priority pollutant list which includes seven PCB Aroclors. Aroclors will be analyzed to support screening level comparisons for the human health and ecological risk assessments. We agree that the collection of data regarding the complete list of PCB congeners is necessary and the work plan will be revised to indicate that 100 percent of shallow sediment samples will be analyzed for 209 PCB congeners (full list) and that 20 percent of deep sediments samples will be analyzed for the full list of congeners. |
| 134 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 3.1.4 | 31 | When the O street outfall is mentioned in the work plan, it is often described as being "adjacent to the WNY". (example Section 3.1.4). Why is that? While WNY is arguably adjacent to the O Street Outfall, there are other properties that could also be considered even more adjacent to the O Street Outfall. While we hate to be overly sensitive, it does raise the question. | We will revise the text to more accurately indicate the location of the O street outfall. |
| 135 | William Bullard | avy Region Mid-Atlan | Federal Government | Table 3.2 | | Explosives are indicated as a COC at WNY soil and Hg as a COC in groundwater. This is not correct. Explosives have been analyzed at the WNY as a matter of being thorough, but have not been detected. Hg has not been found in GW above screening criteria. Please correct. | The heading in Table 3.2 will be changed from "Constituents of Concern" to "Constituents Analyzed" so as to avoid creating the impression that the indicated analytes are a concern in the various environmental media listed in the table. |

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|--------|---------------------------|-------------------------|--------------------|---------------------------|----------|---|--|
| 136 | William Bullard | avy Region Mid-Atlan | Federal Government | Table 3.2 | | The list of COCs for WNY sediment should be updated to list PAHs, lead, and gamma-chlordane (ecological risk) and PCBs and arsenic (human health risk) | We agree with the comment; the revised work plan will more clearly indicate the list of COCs for the project. |
| 137 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 4.2.1 | 44 | PCBs are described as elevated throughout the study area. The work plan defines "elevated" as concentrations above BTAG Region 3 screening benchmarks. However, there is no sediment screening benchmark for PCBs listed in Table 2.5. What is the threshold value used to define PCB concentrations as "elevated"? | The Region 3 BTAG screening value for total PCBs was unintentionally omitted from Table 2-5. The screening value for total PCBs is 0.0598 parts per million, or milligrams per kilogram (mg/kg). The WP will be revised to include this value. |
| 138 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 4.2.7 | 58 | This section states that the only available fish tissue data was from fish filets collected to support fish consumption advisories (Pinckney 2009). However, fish tissue data were also collected as part of the WNY OU2 RI. | The text will be revised to indicate that fish tissue was also collected during the WNY OU2 RI. A summary of the results of this study will be included in the text. |
| 139 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 5.0 | 61 | It is stated that sampling is needed to "allocate contamination to specific sources where possible." What types of approaches is DDOE planning to use to determine allocation? | During the remedial investigation, DDOE is collecting appropriate data, which will assist in determining allocation at a later point in time. Other approaches may be used in later work plans depending on the results, and the corresponding needs for further investigation. |
| 140 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 5.1.2 | 63 | This section states that up to three sediment horizons will be sampled from each core. The broad contaminant profile (higher concentrations in subsurface (mid-depth) sediments and low concentrations in deeper pre-industrial sediments) has already been established from the existing data. Fewer cores with more detailed profiles may provide more useful information about the vertical distribution and extent of contamination. | Outside of the WA Navy Yard, there is no subsurface sediment data. Additional cores with more detailed profiles may be collected in the future for targeted areas. |
| 141 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 6.2 | 69 | This section states that the RI data will be used to quantify zones of "elevated" concentrations. The existing data have already established that concentrations are broadly elevated above Region 3 benchmarks. The question of regional (urban) background and the methods to be used to differentiate hot spots from regional (urban) background concentrations should be explicitly addressed in the work plan. This is a key aspect of the description of the nature and extent of contamination in the Anacostia River. | The identification of areas with elevated concentrations will be determined based on screening levels, risk considerations, and relative concentrations in the overall system. Additional sampling may be required during the design phase to further delineate these areas. Regarding the estimation of background concentrations for sediment, a strategy for defining sampling locations and depths to define project |
| 142 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 6.3 | 70 | It states that the RI will evaluate risk implications of potential exposure to subsurface sediments based on the results of the risk assessments and subsurface sediment chemistry data. This evaluation must also consider sediment stability and current and potential future use (i.e., navigational dredging). | Comment noted. The risk assessments do consider dynamic exposure factors. The feasibility study will also take into account the effects of dredging and other activities that increase exposure to subsurface sediment. Sediment stability and uses will be considered during evaluation of the potential remedial options |
| 143 | William Bullard | avy Region Mid-Atlan | Federal Government | Section 6.4 | 71 | The section on the watershed model update and revision is very general. The data collection activities to support the model update (chemical load inputs) should be specified in the work plan. Will there be a separate modeling update work plan? | As noted in Comment #2, tributary inputs are the focus of an characterization effort being conducted by DDOE separate from the RI. The level of discussion for the Anacostia River model update is appropriate given the current stage of the project. No changes will be made to the work plan. |
| 144 | Fariba Mahvi | Pepco Holdings, Inc. | Commercial Entity | Section 1.4 | 2 | The third sentence of the second paragraph of this section states that the "entity conducting the cleanup [at the referenced sites] will also address sediment contamination. With respect to the site referred to as "Peppo Benning Road," no entity is presently conducting, or obligated to conduct, any "cleanup." Pepco and PES are conducting a Remedial Investigation/Feasibility Study in accordance with a consent decree with DDOE. The sentence in question should be revised to replace the word "cleanup" with "investigation or other response | As used in the referenced text, "cleanup" refers to all phases of a site investigation, not just any remedial activities that may be required. No changes will be made to the text. |
| 145 | Fariba Mahvi | Pepco Holdings, Inc. | Commercial Entity | Section 2.6.2 | 14 | The second sentence of the first paragraph on page 14, describing the Pepco Benning Road site, states that "several PCB, petroleum, and metals releases to the environment occurred between 1987 and 2003 resulting from spills of contaminated oil or leaking equipment." According to the 2012 AECOM document that is cited as the reference for this section of the draft work plan, there were reported historical releases of PCBs and petroleum, but not metals. Metals have been detected in some of the soil and sediment samples collected at the site during previous investigations, but are not attributed to an identified spill event or release. The sentence quoted above should be revised to read as follows: "... several PCB and petroleum releases to the environment occurred between 1987 and 2003 resulting from spills of contaminated oil or leaking equipment; metals also have been detected in soil and sediments samples collected from the site during previous investigations." In addition, this section of the draft work plan omits any description of the actions taken by Pepco to respond to the PCB and petroleum releases. The 2012 AECOM document also reports that Pepco performed appropriate cleanup activities in response to each of these releases. See RI/FS Work Plan, AECOM, December 2012, Section 2.6, pages 12-13 and Table 1. These cleanup activities also are described in the Final Site Inspection Report for the site prepared by Tetra Tech for EPA dated June 30, 2009. See Section 2.3, pages 4-8, and Table 1. The Tetra Tech report further states that "the site is properly managed and spills and leaks of hazardous substances, including PCBs, are quickly addressed and if necessary properly remediated." The draft work plan creates the erroneous impression that these historical releases remain unaddressed. To correct this misimpression, the following sentence should be inserted immediately following the sentence quoted above: "Pepco performed cleanup activities in response to each of these releases in accordance with applicable legal requirements." | The referenced text will be revised in accordance with this comment. Given the summary nature of the discussion, details regarding specific soil excavations and other activities through the Pepco Benning Road Site's history will not be provided. |
| 146 | Fariba Mahvi | Pepco Holdings, Inc. | Commercial Entity | Section 3.1.2 | 24 | The second sentence of the first paragraph of this section states that the "predominant sources for contaminated groundwater" in the vicinity of the Anacostia River are likely six "environmental cleanup sites" bordering the river, which would include the Pepco Benning Road site. This sentence goes on to say that these sites "have documented groundwater contamination issues." This statement is not accurate with respect to the Pepco Benning Road site. No groundwater contamination has been documented to date at the site. Potential groundwater impacts are presently being investigated as part of the RI/FS for the site. The sentence in question should be revised to read as follows: "Possible sources of contaminated groundwater discharging to the river include six sites bordering river that are currently in various stages of investigation or cleanup (Section 3.1.2.1)." | The text will be revised from "documented" to "documented or potential." |
| 147 | Vincent Verweij | None | General Public | Table 4.1 | 39 | Please include language and data on how DDOE can work together with the city's forestry administration, residents, and non-profits to improve our overall sustainability through understanding canopy loss in the watersheds being analyzed. While we still need traditional grey infrastructure to alleviate some of the impervious cover in our city, a healthy tree canopy is one of the most comprehensive stormwater interception tools to a much wider range of problems, including stormwater control. | Although maintaining and, if possible, increasing the District's tree canopy in the Anacostia watershed is desirable with regard to improving the quality of the river, any investigations or actions in this regard are beyond the scope of the RI. |
| 148 | Vincent Verweij | None | General Public | Table 4.1 | 39 | Through permitting process revision in the EPA (Chesapeake Bay Best Management Practices (BMP) Verification Committee, 2012), and various watershed management projects throughout the country, tree canopy, tree planting and other green infrastructure are becoming more accepted in their role in stormwater control, where appropriate, supplementing grey infrastructure of pipes and culverts in reducing and holding stormwater, often at greatly reduced cost and risk. | We acknowledge this comment. |
| 149 | Vincent Verweij | None | General Public | Table 4.1 | 39 | Washington, DC currently has approximately 35% tree canopy, and is working towards improving that percentage to 40% by 2035. While the Urban Forestry Administration, as well as several non-profits are working together to improve the urban forest, there is space for reforestation in less urbanized areas as a significant stormwater control option, and I feel this fits perfectly into this plan. An analysis on canopy loss and prioritization on the highest loss areas would be appropriate. This data is readily available, and would give a better understanding on trends and the potential for high canopy loss areas to suffer from increased stormwater input through reduced | Please see the response to Comment #147. |
| 150 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | General | | Generally a well-written and thorough plan. I particularly appreciated the comprehensive, yet succinct, summary of the site setting, conditions, and extensive data that has been collected to date. | We acknowledge this comment. |
| 151 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 1.1 | 13 | The stated objectives are not consistent with the scope of work referred to in the previous paragraph. They should be revised to include the key components / objectives from the SOW or the discussion should indicate if the objectives from the SOW were revised per DDOE. | Please see the response to Comment #6. |

| Number | Commenter/ Representative | Organization | Type | Section/Table/Figure Nos. | Page No. | Comment | Response |
|--------|---------------------------|-------------------------|--------------------|---------------------------|----------|--|---|
| 152 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 1.4 | 14 | The WP limits the scope to "the tidal river from bank to bank" and specifically excludes adjacent wetlands. The wetlands likely serve as both contaminant sinks as well as secondary sources of contamination. They also very likely play an important role in contaminant cycling and transfer to and within biota. By excluding the wetlands associated with the tidal river, it will not be possible to accurately and completely meet the objectives and task requirements as stated in the SOW and this WP. Understanding the relationship of the tidal river and the floodplain and island soils, in terms of contaminant fate and transport, is also important, but perhaps not to the same degree as the | Please see the response to Comment #26. |
| 153 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 1.4 | 14 | The plan states that in order to avoid duplication of effort, sampling locations defined in the WP were biased away from portions of the river that are associated with the adjacent environmental sites. Caution must be taken to ensure that this will not result in data gaps. The river adjacent to each site may not have been appropriately characterized as part of site activities, and future sampling efforts may not be finalized at such sites. | The current work plan does include samples in and adjacent to environmental sites being investigated by others to minimize data gaps between efforts. |
| 154 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 1.6 | 16 | The description of Section 5 refers to "identified data gaps". The section of the work plan where the identification of these data gaps will take place should be mentioned in the description of the appropriate work plan section (4.0). | Section 4 will be revised to indicate that a data gap assessment is provided in Section 4.2.7. |
| 155 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 2.7 | 34 | The last sentence of the "Sampling Period" discussion indicates that a representative number of the 2000 locations will be re-sampled. It would be helpful if the target number / percentage were identified. | The text will be revised to indicate that 26 samples or 20 percent are selected to resample previous sampling locations. |
| 156 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 2.7 | 35 | The soil and groundwater numbers should also be compared with appropriate ecological screening values (e.g., Eco SSLs and BTAG FW screening values, respectively). The industrial soil SSLs are not necessarily protective of ecological receptors nor would they be indicative of a potential issue with runoff of the soils to sediment. Similarly, residential tap water MCLs may not be protective of ecological receptors for all contaminants (particularly for receptors at the groundwater / surface water interface). | Appropriate ecological benchmarks will be used. Sediment benchmarks include the threshold effect levels and probable effect levels (MacDonald, D. D., C. G. Ingersoll, et al. (2000). "Development and evaluation of consensus-based sediment quality guidelines for freshwater ecosystems." Archives of Environmental Contamination and Toxicology 39(1): 20-31. (Coordinate with RTC #409 Rebecca?) |
| 157 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 3.1.2 | 45 | Runoff of contaminated soils is another source that should be noted here. | The specific text indicated cannot be located on Page 45. However, the erosion of contaminated soil is discussed as a source of contaminants to the river at various places in Section 3. |
| 158 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 3.2.3 | 56 | Exposure to (potentially) contaminated groundwater at the groundwater / surface water interface should be noted. Exposure of the hyporheos may play an important role in the transfer of contaminants to upper trophic level receptors. | Pore water samples may represent the groundwater/surface water interface in some locations. Otherwise, groundwater may enter the river and become mixed with river water. No specific sampling of the groundwater/surface water interface is proposed for this RI. |
| 159 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 71 | Step 3, second bullet - The interpretation of the data does / should not really vary between the RI and NRDA, but the use of the data does. As written, the statement implies there could be different interpretations / conclusions of the same data. | The statement will be re-written to clarify that the interpretation of the data will be the same for both the RI and the NRDA. |
| 160 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 72 | Step 4. As previously noted, the study boundaries should include associated wetlands which are likely associated with contaminant cycling / fate and transport within the system. | Please see the response to Comment #26. |
| 161 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 72 | Given the potential differences in understanding, references to PCB Aroclor analyses should parenthetically identify the analytical method. The work plan should very clearly identify the target analytes / methods early in the document. It should also be noted that apparently standard terminology may mean different things to different readers. For example, does "PCB Aroclors" mean the same thing as "total PCBs" or Aroclors by Method 8082 with 19 congeners? | We agree with the comment; the revised work plan will more clearly indicate the list of COCs for the project and provide clarity regarding PCB analyses. |
| 162 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 71 - 73 | There is no indication that efforts will be made to calculate bioaccumulation factors (BAFs) and biota / sediment accumulation factors (BSAFs). The determination of "site-specific" factors are likely to be important for the generation of site specific remediation goals. This may be especially important if human consumption of fish tissue drives risk. There should be consideration given to developing the ability to defining accumulation factors according to sediment management areas in the event that the sediment characteristics indicate that this is appropriate and warranted. | BSAFs will be calculated as part of the ecological risk assessment to the extent warranted by the data. |
| 163 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 71 - 73 | Histological examination of tissue may warranted to assess both exposure and impact. If the appropriate data is collected, it should also aid in the establishment of ecological risk-based cleanup levels. | No histological examination of fish tissues is proposed at this time. We will incorporate data collected by Fish and Wildlife Service on brown bullhead tumors and similar technical studies as they are made available. |
| 164 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 73 | It is recommended that, if possible, sediment bioassays be run for multiple test species to account for potential differences in sensitivity. | We currently propose using the 42-day <i>Hyalella azteca</i> test and the 10-day <i>Chironomus dilutus</i> test. |
| 165 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 71 - 73 | There should be mention of measuring / establishing oxidation potential and total organic carbon of sediments and lipid concentrations of biota. (It appears that efforts were made to identify the other testing / analytical parameters in this table, these parameters were noticeably absent.) | Redox potential and total organic carbon will be added to the table as suggested. |
| 166 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Table 4.1 | 73 | Necessary field parameters should also be specified (pH, ORP, DO, conductivity, etc.). | Field parameters will be more fully explained in the QAPP and Field Sampling Plans. |
| 167 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | General | | While the risk assessment discussions note the use of background concentrations / comparisons, a discussion of the determination of background concentrations is noticeably absent from the document. The risk assessment sections do note the use of "regional" background, however this is reference is vague and will possibly result in a data gap. The determination of background concentrations should be specifically addressed in the plan. | Please see the response to Comment #141. |
| 168 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 4.2.7.2 | 89 | Sediment porewater is also important for exposure assessment and to evaluate the potential spatial impact of contaminated groundwater. | Concentrations of constituents in pore water will be primarily used in the ecological risk assessment. In addition, in agreement with the comment, the porewater data will support a preliminary assessment of potential zones where contaminant loading due to groundwater influx may be significant. The porewater discussion in Section 4.2.7.2 will be revised accordingly. |
| 169 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 4.2.7.3 | 90 | Select populations do consume more than just filets. It is important to collect samples for whole body tissue analyses for human health risk assessment, as well as ecological risk assessment. | We have learned that DDOE Division of Fisheries and Wildlife has already collected fish filet samples to support human consumption advisories in the Anacostia River. Therefore, we will not collect additional whole fish samples for the human health risk assessment. We will use published equations to estimate the exposure concentration in whole fish. We will sample whole fish to support the ecological risk assessment. |
| 170 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 4.2.7.3 | 90 | Provisions should be considered for benthic community studies in the event that the RI data indicate that they may be warranted. | Please see response to comment #10. |
| 171 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.1.2 | 111 | Sediment sample locations should not just be biased according to areas of human activity. Locations should also be selected which are representative of the ecological habitats which are present. In addition, sediment sampling is typically conducted to ensure that fine-grain deposits (likely points of contaminant accumulation) are targeted and characterized. | Sediment samples have been selected to represent a variety of microhabitat types, including those described in the comment. Please see Table 5-2 for details on sediment sampling stations. |
| 172 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.1.3 | 113 | Consideration should also be given to the collection of pore water samples in areas of historical groundwater contamination and known areas of contaminated sediment. Provisions should be made to allow for the use of in situ approaches (e.g., diffusion bags). | In this field effort, we are collecting pore water at a subset of sediment locations. Pore water samples will be collocated with surface sediment chemistry and laboratory toxicity test locations. If necessary, we will collect additional pore water samples to support the feasibility study and remedial design during a subsequent phase. In situ methods may be considered at that time. |

| Number | Commenter/ Representative | Organization | Type | Section/Table/Figure Nos. | Page No. | Comment | Response |
|--------|---------------------------|-------------------------|--------------------|---------------------------|----------|---|--|
| 173 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.1.4 | 113 | The first sentence refers to "benthic invertebrate characterization sampling". "Characterization" should be deleted as this is not the intent of the activities described. | We have revised the text to use the term "benthic invertebrate exposure" locations to represent the two-pronged approach to evaluating sediment at these locations. As described in the text, we will collect benthic invertebrates if they are present in high enough densities to support collection for tissue analysis. We will also collect surficial sediment for chemical analysis. The combined dataset at these locations may include (1) presence/absence/density of benthic invertebrates; (2) chemical concentrations of invertebrate tissue, when available; and (3) sediment toxicity test results. Together, these data are considered to address "benthic invertebrate |
| 174 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.1.4 | 113 | In general, this section is confusing. It should only describe sediment sampling for toxicity testing. The collection of benthic biota is addressed in Section 5.1.5. | The opportunistic approach to collecting benthic invertebrate tissues for analysis of body burdens is somewhat confusing. However, we consider it a more realistic approach than a prescriptive approach that is likely to result in many locations being labelled "insufficient." Our proposed approach is to collect benthic invertebrate tissues wherever we encounter adequate supplies at any designated sampling location. This approach has the added advantage of realistically representing the way a foraging animal encounters benthic invertebrates, enhancing the credibility of the exposure model in the ecological risk assessment. |
| 175 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.1.4 | 113 | Even if a sufficient number of organisms is present, sampling for toxicity testing may be appropriate. Benthic invertebrate tissue analysis will document exposure and will be useful to assess bioavailability and help to establish BSAFs. Toxicity testing is used to assess other endpoints (e.g., survival, growth, and reproduction). | We agree that it would be useful to conduct toxicity tests at every sediment station. However, budgetary constraints require that we make choices about how to characterize each location. We acknowledge that there is no perfect way to select sampling stations or measurement endpoints at each station. Our approach is intended to provide at least one type of data relevant to benthic invertebrate exposure to contaminants at each designated sampling location. The presence of dense aggregations of benthic invertebrates allows us to analyze tissues at that location. Where organisms are too scarce to support tissue analysis, we will default to laboratory toxicity tests. |
| 176 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.1.4 | 113 | It is not clear why the sampling points would be biased to include inlets, outfalls and bridges. These locations are not necessarily ones where benthic invertebrates are likely to be found nor are they necessarily ones where fine-grained sediments are likely to deposit. Care must be taken when collecting these samples to ensure the appropriate substrate is collected. | Sediment samples are located in a wide variety of habitats to that the nature and extent of contaminants can be adequately characterized. Inlets and outfalls are of interest as potential sources of contaminants. Bridges and piers are of interest because sediment tends to shoal around such in-water structures. |
| 177 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Sections 5.1.4 and 5.1.5 | | These sections must clearly indicate the analytical parameters for the biota (both field and laboratory specimen) and for the sediment. | Constituents to be measured in each sample type are described in the forthcoming Quality Assurance Project Plan (QAPP), a companion document to the WP. |
| 178 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.2 | 115 | While it would be ideal to co-locate surface water and sediment samples, it is important to note that locations that are well suited for surface water samples are not necessarily appropriate for sediment. The converse is also true. It is more important to site the samples appropriately than to ensure they are co-located. | Comment noted. The rationale for the proposed sediment and surface water locations is in Table 5-2. The text will be revised to clarify that samples will be collocated only when it makes sense to do so. |
| 179 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 5.3 | 116 | The sampling design should also consider the typical ranges of the target species. Efforts should also be made to target species with high site fidelity and small home ranges in areas of known contamination to document exposure, and potentially effect, as well as bioavailability and BAF/BSAF. As previously noted, both the fillets and remaining tissue (offal) should be analyzed, the results of which can be combined to be indicative of whole body concentrations, in order to allow for evaluation of risk to both ecological receptors (larger piscivores and scavengers) and humans. Analyzing for fillet concentrations and whole body will allow for assessment of exposure for "typical" individuals as well as those that consume more than just fillets. | Please see response to comment #63 and #169. |
| 180 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Figures 5.2 and 5.3 | 18, 11 | There is insufficient coverage in the reach adjacent to the Kenilworth Park Landfills. | Sediment data from this section of the river are available in existing reports. |
| 181 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | General | | As noted previously, it is important to characterize key wetlands within the study reach. One of the most obvious omissions are the wetlands north of Kenilworth Landfill North (Kenilworth Aquatic Gardens). | Please see the response to Comment #26. |
| 182 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 7.1 | 135 | In the first bullet, the decision point for no further action should read "no unacceptable risk" or "negligible risk" rather than "very low or non-existent". While this may seem to be a matter of semantics, "very low" tends to be a qualitative description where consensus may not be easily reached, whereas consensus can usually be reached more readily when characterizing the outcome as "no unacceptable risk" or "negligible". | The text will be revised as suggested. |
| 183 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 7.1.1.2 | 136 | It may be difficult to adequately address the second assessment endpoint without considering the associated wetlands and floodplains. | We understand that mobile receptors spend a portion of their time in adjacent wetlands and other habitats. However, the current RI addresses only exposure to sediment and water in the tidal Anacostia River itself. |
| 184 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 7.1.2.3 | 38, 13 | It should be noted that NOAEL-based TRVs are typically preferred for making decisions after the SLERA. That said, we do encourage the use of LOAEL-based TRVs in order that the range of potential risk is better understood. It should be noted that site-specific ecological risk-based cleanup values, typically generated as a result of the BERA, should fall between NOAEL and LOAEL levels. | We acknowledge this comment. |
| 185 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 7.1.3 | 140 | For multiple reasons, it is typically recognized and stated that the magnitude of exceedance is not indicative or the magnitude of risk or impact. To imply that it is would be an oversimplification with a high level of uncertainty (and likely inaccuracy). | The text will be revised to clarify that magnitude of exceedance is not necessarily proportional to risk. |
| 186 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Section 7.2 | | The work plan already makes provisions for the collection of data necessary for the conduct of the BERA. While the results of the proposed efforts may indicate the need for additional data, the existing information is sufficient to scope the data collection efforts (as reflected in this plan) and utilize it to complete the BERA. Section 7.2 should be revised to describe the completion of the BERA with the data that will result from this investigation. The SLERA is necessary to explain the process leading to the BERA, but the Ecological Risk Assessment report can be prepared in a more streamlined manner than is typically done when the SLERA and BERA must be completed sequentially (and the SLERA data is needed to scope the BERA). It should be noted that this approach will not preclude the collection of additional data if necessary. | The SLERA is simply Steps 1 and 2 of the 8-step ERA process, as described in response to comment #96. We agree that the risk assessment process will be streamlined by preparing the SLERA and BERA at the same time. |
| 187 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 1.1 | 13 | Last bullet: "...of the feasibility study (FS). Recommend adding 'if needed to address unacceptable risk to human health and the environment' | The text will be revised in accordance with this comment. |
| 188 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 1.4 | 14 | It appears from Figure 1.1 that the Naval Support Activity Anacostia (Previously Bolling AFB) is partially in the study area. Remedial investigations have been conducted at this site. Similarly, the Washington Gas Light Consent Decree provides for the conduct of an RI/FS in sediments adjacent to the site. Also, in the second paragraph it says "the entity conducting the cleanup will also address sediment contamination in the adjacent impacted segment of the river channel". Perhaps this statement should be clarified by adding something like "if the contamination is associated with the site(s)". There are situations where site related contamination is confounded by other inputs such as CSOs or other sources. | We will add Joint Base Anacostia Bolling to the list of RP sites and provide a brief summary of the remedial actions conducted at the facility. In addition, we will revise the text to indicate that the entity conducting the cleanup at a given RP site will also address sediment contamination in the adjacent river if it is determined that the site is responsible for the observed contamination. |
| 189 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 1.5 | 15 | Suggest adding a bullet to CIP goals: "To be consistent with CERCLA and the NCP" | We will add a bullet to the referenced text stating "Ensure consistency with CERCLA and the NCP." |
| 190 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 2.2 | 20 | May want to add a sentence to the TMDL discussion saying the TMDLs are under review/revision. | The text will be revised in accordance with this comment. |

| Number | Commenter/ Representative | Organization | Type | Section/Table/Figure Nos. | Page No. | Comment | Response |
|--------|---------------------------|--------------------------------|--------------------|---------------------------|----------|---|---|
| 191 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 2.5 | 26 | NPS sampling at Kenilworth is being conducted in 2014 (not 2013) | The text will be revised in accordance with this comment. |
| 192 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 2.5 | 30 | Additional sediment sampling at the Washington Navy Yard is planned for 2014/2015 as part of a near shore sediment FS | The text will be revised to note that additional, near shore sediment sampling at the Washington Navy Yard is planned for the 2014 - 2015 timeframe to support the WNY FS. |
| 193 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | Figure 1.1 | 17 | On figures 1.1, 2.1, 3.2 (and others) the legend entry "Cleanup Site Boundary" should be changed to "Cleanup Site Boundary (Land Based Portion)" | On all figures that depict the cleanup sites that border the river, the figure legends will be revised as requested. |
| 194 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 3.1.1 | 44 | Detection and reporting limits for existing dioxin data may be well above screening levels. Also dioxin has not been analyzed at all of the contaminated sites, and could be present from air deposition. | PCDDs and PCDFs will be analyzed in a subset of the sediment samples (20 percent). The samples will be determined prior to the field effort and will be biased toward the RP sites. The project team believes that the number and locations of PCDD and PCDF samples will be sufficient to characterize these constituents. No changes will be made to the work plan. |
| 195 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 3.1.1 | 47 | WGL Site: A Remedial Investigation including near shore sediment is ongoing. | The text will be revised in accordance with this comment. |
| 196 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 4.1.2 | 71 | Table 4.1 Step 2: May want to add a goal of identifying contaminated areas not previously sampled in existing studies | This goal is covered in the existing text in the first bullet of Step 2. As stated in the first bullet of Step 2, a goal of the study is "obtaining additional data to complete the spatial coverage of the site, and identifying potential sources of COCs in the sediment." No changes will be made work plan. |
| 197 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 4.1.2 | 71 | Table 4.1 Step 2: May want to add a goal of assisting in the attribution of contamination to known or unknown sources | This goal is covered by the second bullet. However, the text will be revised to more directly note that a goal of the RI is to assess attribution of contamination to known or unknown sources. |
| 198 | Bruce Pluta, Steve Hirsh | U.S. EPA Region 3, HSCD | Federal Government | 6.1 | 132 | Not all data requires Level 4 validation. Data use defines validation requirements (see 4.1.1 Validation table) | The text indicates that analytical data (meaning chemical analyses results generated by the fixed-base laboratory for the project) will be subjected to Level 4 data validation. Field screening and field parameter data will not be validated (e.g., Levels I and II from Section 4.1.1). The text will be revised to indicate that chemical analyses results from the fixed-based analytical laboratory will be validated in |
| 199 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Whole Document | | The objectives of the WP on page 1 and DQO statement of the problem in Table 4.1 appear to be missing some key objectives. To practically reduce the contaminant contribution to the river, the primary contribution mechanisms and/or areas should be defined (within the definition of nature and extent). This will provide the information required in the FS to address the greatest contaminant mass contribution mechanism or area for those compounds with the greatest risk. This can only be accomplished by sampling the entire river uniformly and with a sufficient quantity of sample locations. | With regard to the alignment of Work Plan objectives with the Statement of Work objectives, please see the response to Comment #6. With regard to the number of samples that are planned for the various media and the adequacy of the coverage, the project team believes that based on the existing data reviewed in preparation of the Work Plan, the numbers of planned samples are appropriate. |
| 200 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Whole Document | | The quantity and spatial distribution of all sampling locations for all media is inadequate to provide an unbiased database to meet stated, or unstated, project objectives. Known contaminant sites should not be excluded from the sampling effort under the assumption that the sites will collect the data, and unknown contaminant sites are insufficiently represented (i.e., significant reaches of the river are excluded, potentially missing unidentified contaminant sources). | The Work Plan does specify data collection and evaluation over the entire project area. The project team will clarify in the document that information collected by others in the project area will be incorporated into the results obtained from the RI sampling, which will encompass the entire study area. |
| 201 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | General NRDA | | The Department of the Interior (DOI) has promulgated regulations (implementing procedures) at 43 C.F.R. Part 11 that outline the requirements of conducting a NRDA under CERCLA; these regulations are a requirement for implementing a NRDA for this case. The Work Plan does not mention the regulation or its requirements. Some of the more important and initial requirements are outlined below. a. Identification of trustees, formation of a Trustee Council, and development of a Trustee Council memorandum of understanding (MOU). The MOU formally establishes the trustee council as a decision-making body, defines roles and responsibilities, identifies trustee representatives, provides a mechanism for decision and dispute resolution, includes requirements for confidentiality, and a means for discussions with the potentially responsible parties. The Trustee Council has many different responsibilities, including case management (planning/strategy, documentation, coordination and negotiation), project management (technical projects, such as scientific and/or economic studies); and administration (keeping the administrative record), contracting, and logistics. b. Designation of an Authorized Official for each trustee. Authorized Officials have specific responsibilities per the regulations, including identification and notification of trustees, notification of intent to perform a NRDA, signature on decision documents, and dispute resolution, to name a few. | This Work Plan is not intended to qualify as an NRDA, it states that DDOE will attempt to collect data that will be useable once the NRDA is performed at a later date. We can cite the specific NRDA regulations and clarify what the document does and does not do. |
| 202 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | General NRDA | | Without formation and guidance of a Natural Resource Trustee Council, the proposed data collection proposed may or may not cover all resource data needs to conduct a NRDA. | The project team agrees with the comment. However, even if a Trustee council is established, this work plan does not address everything that would go into an NRDA, nor is it intended to. We can cite the specific NRDA regulations and clarify what the document does and does not do. |
| 203 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | General NRDA | | The document does not provide adequate identification of potentially responsible parties or alternate form of funding. It is unclear how to move forward with CERCLA and NRDA activities without a funding source identified. | One purpose of the remedial investigation is to collect appropriate data, which will be used to allocate contamination at a later point in time. Partly because of this, DDOE is not identifying potentially responsible parties at this time. Additionally, many PRPs are already under enforceable Consent Decrees. For many years, the Anacostia River's cleanup has been allowed to languish. However, the District has allocated funding to start cleanup and to accomplish the remedial investigation and the Feasibility study. |
| 204 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | General NRDA | | Include a discussion of how Applicable or Relevant and Appropriate Requirements (ARARs) will be identified; some of those include: FIFRA, TSCA, RCRA, ESA, MBTA, MMPA, CWA, CAA, NEPA, OPA, and NHPA. Additionally, there are other DOI and NPS specific regulatory requirements, policies and procedures that need to be incorporated into the document, including the NPS Organic Act, NPS Director's Orders, NPS Management Policies, etc. For NRDA, NPS may utilize the Park Service Resource Protection Act (PSRPA) (16 U.S.C. § 191j) for compensation for damages for park system resources. | The identification and assessment of ARARs will be critical in the FS stage of this project. However, we agree with the Comment that an ARAR assessment is appropriate also for the RI and will add a section (Section 2.6) that will provide preliminary identification of ARARs and discuss how they will be addressed. |
| 205 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | General NRDA | | Greater consultation and cooperation between DDOE and DOI regarding this document should occur before finalization. Given that NPS has jurisdiction over the bed of the Anacostia, and that the lands adjacent to the proposed study area are primarily owned by NPS, this consultation and cooperation are essential to the success of efforts to restore the Anacostia. | DDOE and DOI/NPS have been in frequent consultation, including phone calls, e-mails, and meetings (Feb. 9 and Apr. 10, 2014), since the release of the draft Work Plan. More meetings will be held as is needed. DDOE also invited DOI/NPS officials to be part of the technical review committee. |
| 206 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.0 | 1 | The SOW document linked is a Statement of Work, not a Scope of Work. | We will clarify the text to note that the acronym "SOW" as used in the text refers to "Statement of Work." |

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|--------|---------------------------|--------------------------------|--------------------|---------------------------|----------|---|---|
| 207 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.2 | 1-2 | This section should contain proper citations for CERCLA and NRDA, specifically: Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended (42 U.S.C. §§ 9601-9675), Executive Order 12580, and the National Oil and Hazardous Substances Pollution Contingency Plan (40 C.F.R. Part 300, Executive Order 12580 was amended by Executive Order 13016), and NRDA Regulations at 43 C.F.R. 11. | We will revise the text to include the appropriate regulatory citations for CERCLA and NRDA. |
| 208 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.3 | 2 | The document does not provide an adequate description of the NRDA process for the public to understand this aspect of the work plan. | The WP is focused on the RI, with only a brief mention of the NRDA as a preview of future uses of the data being collected. As stated in the first paragraph of Section 9.0, a separate WP will be prepared to guide NRDA data collection and analysis. |
| 209 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.3 | 2 | It appears that DDOE & Tetra Tech are focusing primarily on lost recreational use and collecting information (e.g. fish tissue data) that can be used to support a NRDA claim. Natural resources are discussed in Task 1, but only in reference to having "social, recreational, or economic value to various public user groups". Task 1 also specifically mentions fish tissue advisories and violations of water quality criteria. All of this information can be used in HEA analysis, but it appears that the primary interest is in determining damages to human activities including parks and recreational facilities. Damages to ecological resources are included in the NRDA but almost as an afterthought. Establishment of a Trustee Council will guide the NRDA activities to determine the extent of damages to any impacted ecological resources and their services in a mutually agreeable effort. | As mentioned above, the WP is focused on the RI. It addresses only elements of the NRDA that clearly overlap with the RI. Formal work on the NRDA will take place after the RI is well underway. A focused WP will be prepared to guide NRDA data collection and analysis, as described in Section 9.0 of the WP for the RI. |
| 210 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.4 | 2 | Please adjust this text. The altered river began with during first European settlement with clearing the land for agriculture (acknowledged later in the document) followed by extensive urban development. | We agree with the comment. The text will be revised to indicate that alteration of the shoreline and channel from predevelopment conditions began with the clearing of forests for agricultural purposes during initial settlement of the Anacostia watershed. |
| 211 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.4 | 2 | During urban development, dredged sediments from the Anacostia River were used to reclaim land on either side of the river while the seawalls were being built. Should DDOE consider testing those reclaimed locations because of the sediments used there? | Please see the response to Comment #108. |
| 212 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.4 | 2 | Regarding Kenilworth Park Landfill and Poplar Point, NPS does not assume sediment contamination in the adjacent impacted segment of the river channel will be addressed by NPS if there is no correlation to contamination or contaminant transport from the site. | We agree with the comment. The project team intends to compare the chemical characterization data obtained sediment samples collected for the RI to the site characterization data from the respective Responsible Party sites located in close proximity. The presence of a strong correlation between the contaminant concentration data from an RP site to the contaminant concentration data measured in the adjacent river channel would constitute one line of evidence that the site is a potential source of the observed sediment contamination. |
| 213 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.4 | 2 | Consider data collection throughout the river to avoid having incomplete data. | The project team believes that the planned sampling distribution covers the entire project area. Information collected by others in the project area will be incorporated into the results. No changes to the Work Plan will be made in response to this |
| 214 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 1.4 | 2 | Sea level rising data projections indicate that many of the reclaimed floodplains adjacent to the river will become part of the riverine system. Should there be adjustments to the plans to take that into account? | Please see the response to Comment #108. |
| 215 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Figure 1.1 | 5 | Make the map components match the legend labels. For instance: the congressional cemetery could be considered a freshwater emergent wetland. Some of the legend items don't seem to be on the map. Please consider a higher resolution map to clearly show these wetland types. Please also define New ACC & AWTA AOC. | Consistent with the scope of the investigation (study area includes the active channel from bank to bank), Figure 1.1 is intended to show the extent of the study area rather than provide a detailed portrayal of wetlands areas in the vicinity of the tidal river. To avoid confusion regarding the distribution of specific types of wetlands, the figure will be revised to depict adjacent wetland areas via a single generic wetland symbol; the legend will be revised to indicate one symbol for these areas designated as "wetland." Additionally, all acronyms noted on Work Plan figures will be defined on each figure as appropriate. |
| 216 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.1 | 5 | Explain why the Washington Channel was included as part of the study area. Is it because of the number of outfalls? | The Washington Channel is included in the investigation study area for the following reasons. As is the case for the main tidal stem of the Anacostia River, the Washington Channel is also used extensively for fishing, which, as noted by the recent OpinionWorks Survey, may be for subsistence purposes. Characterization of conditions in the Washington Channel is, therefore, also of importance. In addition, the RI study area is consistent with previous Anacostia River investigations such as the ANS 2000 study. For consistency and comparability purposes, the RI study area was defined over the same area. |
| 217 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 5 | Former Stewart Petroleum (West bank of Anacostia River) - There is no discussion about past spill history from this site. What impacts has this site had on sites adjacent and to the river? Prior to DC's ownership of this land, Mactec conducted sampling along boat house row. Floating product was witnessed at Eastern Power and District Yacht areas. What is DC doing to address the known contamination? What were the findings at the former petroleum site which is under construction for the combined sewer project? | This comment identifies several sites that are not identified in the Work Plan as potential sources of contamination to sediment in the river. The work plan will be revised to include a summary of the available information for the sites mentioned. |
| 218 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 5 | The former Anacostia Marina was a working boat yard, known for contamination and history of spills. Groundwater was impacted. DC allowed site to be developed by DC Rowing Club. Reference the RI NPS performed. | Please see response to Comment #217. |
| 219 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 5 | Use "historical" to describe the dredging events, not "historic." This comment also applies to descriptions of previously-collected data. | The work plan will be revised in accordance with this comment. |
| 220 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 5 | Include more information related to the dredging. The USACE dredged the river channel approximately every ten years. Staff remember early 1970s, early 1980s, and 1992. Bladensburg had its own dredging operation placing material at Colmar Manor. River sediments, dredged and used to create land along the Anacostia behind the seawall, could also be contaminated. | The dredging discussion provided in the work plan will be revised and expanded with the information provided by the commenter and through additional web searches based on the information provided. |
| 221 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 6 | Expand from just mentioning Kingman Lake. Rewrite To: "More recently, USACE performed dredging of main river channel from 1992 to 2006 to support wetland reconstruction at Kenilworth Marsh (1992), Kingman Lake (2000-2006), and the River Terrace & Kingman Island fringe marshes (2003). The dredge spoil was used to re-establish elevations required to support emergent wetland vegetation. | Please see response to Comment #220. |
| 222 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 6 | Change "Kenilworth Aquatic Center" to "Kenilworth Aquatic Gardens" | The work plan will be revised in accordance with this comment. |
| 223 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 6 | Bladensburg Marina dredged spoils were not used to restore Kenilworth Marsh. MD-NCPPC had an ongoing dredging operation at Bladensburg Marina... pumping that material to "ponds" at Colmar Manor. The Kenilworth Marsh restoration used spoils dredged from the Upper Tidal Anacostia River (including adjacent to the Marsh). The sequence of discussion of dredge spoils used in wetland restoration is odd in these 2nd and 3rd paragraphs. Perhaps the idea of beneficial use of dredge spoils in wetland restoration should be lumped in paragraph 2? | Please see response to Comment #220. |
| 224 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.2 | 6 | TMDL paragraph: Include the current review of TMDLs for the District due to a CD. How that study impact this currently established TMDLs? | The current work that the District is performing regarding TMDLs will be summarized in the text. Although the results of the RI may influence the TMDLs in the future, it is premature to speculate what the range and nature of these impacts. |

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| 225 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.3 | 7 | The District possesses detailed geological information about the river sediments, such as the subsurface profile prepared by Mactec for the South Capitol Street Bridge. Presumably, similar cross-sections were prepared during the 11th Street Bridge construction planning phase. Include and discuss these profiles with respect to mud depths and underlying geology, including coarse materials and underlying clay. This discussion should inform your choice of appropriate sediment sampling depths and methods. | We agree that the geological information available from construction sites (such as the noted bridge projects) and also the cleanup sites are important resources for understanding potential preferential migration pathways for groundwater. However, the RI includes the collection of subsurface sediment cores at over 80 locations and will be the primary source of lithologic information for evaluating the presence potential significant groundwater discharge zones to the river. This subsurface sediment cores will be evaluated in concert with the information identified by the commenter during the analyses performed to support preparation of the RI report. No changes will be made to the work plan. |
| 226 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 12 | Include other studies with focused or limited scope including: Hittman Ebasco, Athanus, Diane Douglas & Will Logan. | Please see response to Comment #217. |
| 227 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 13 | The following sentence does not paraphrase any information in the referenced FS report: "During this period the landfill extended into the Anacostia River and no barriers were constructed to prevent migration of wastes mixed with soil into the water." In fact, the FS report states, "There are low hydraulic conductivity soils between KPN and the Anacostia River and Kenilworth Marsh limiting groundwater flow to those surface water bodies." The FS report also states, "There are low hydraulic conductivity soils between KPS and the Anacostia River limiting groundwater flow to the river." The statement is from the KPS RI (E&E, 2008), and possibly describes waste disposal that occurred in lakes located east of the existing Anacostia River channel; photographs provided in the KPS RI report show a line of trees between the existing Anacostia River channel and the landfill. | In Section 2.4 (pdf page 39) of the 2008 Ecology and Environment document entitled "Final Remedial Investigation at the Kenilworth Park South Landfill N.E. Washington, D.C." (prepared for the National Park Service) states "Aerial photographs (Appendix A) show that initial patches of fill appeared in 1957. By October 15, 1963, the fill area extended nearly 700 feet north-to-south from the inlet of Kenilworth Aquatic Gardens to the inlet south of the park receiving the discharge of Piney Run just north of the PEPCO plant. Watts Branch bisects the fill area. The landfill material was placed directly into the river without any barrier, and landfill wastes mixed with soil still extend into the water." It is agreed that the text suggests that the text could be interpreted to suggest that waste extended into the river for the entire period from 1942 to 1968. Consistent with the above quoted text, the work plan will be revised to state "During a portion of this period, the landfill extended into the Anacostia |
| 228 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 13 | Replace this text, "NPS will collect additional groundwater data in 2013" with "NPS collected additional groundwater data in 2014." | The work plan will be revised in accordance with this comment. |
| 229 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 13 | The second full paragraph inaccurately discusses sediment samples collected in 1998. As shown in the FS document that this section claims to summarize, sediment samples were collected in multiple investigations at KPS and KPN. As shown in Figures 2-5 through 2-8 of the 2012 Kenilworth Landfill FS, sediment samples were collected from 3 upstream locations, 15 locations in the reach adjacent to the landfill, and 3 locations downstream of the landfill. SD-1 through SD-5 samples were collected in 1998 but none were collected from the Anacostia River (KPS 1998 Report on Sampling); SED-# samples were collected in 1999 and SMP samples were collected in 2000 (KPS PA/SI); SED-0# samples were collected in 2001 (KPN PA/SI, where they were called SD samples), SD-6 through SD-18 samples were collected in 2006 (KPN RI). In the documents listed in this comment, there are relevant data for SED-01 (aka SD-01); SED-7 through SED-12; SMP-A through C, E through G, and I through N; and SD-12 through SED-13. There were 12 samples in the reach adjacent to Kenilworth collected in 2000 or later, and 3 samples upstream of Kenilworth collected in the same date range. The data summary regarding PAHs is not correct- not all of the samples collected exceeded the screening level for at least one PAH. The summary for pesticides is incorrect- many samples did not exceed the pesticide BTAGs. The PCB exceedence count is not correct. It is unclear what samples are summarized in this paragraph, but it appears that the summary could include samples collected from surface water bodies separate from the Anacostia River, possibly including standing water on the landfill surface, Kenilworth Marsh, or Watts Branch. It is inappropriate to include any of these data in the Anacostia River dataset. | This comment provides a review of the work plan's summary of the sediment sampling data collected from the Anacostia River in connection with various investigations conducted by NPS. The work plan text will be reviewed with respect to the information provided in the comment and the relevant documents. If any inaccuracies in the work plan text are identified they will be corrected. |
| 230 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 15 | Correct the Park name to "National Capital Parks- East", not Capitol. This comment also applies to Section 11.0. | The work plan will be revised in accordance with this comment. |
| 231 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 15 | The reference for the WGL Statement of Work (SOW) should be "The 2012 Statement of Work," not "The October 2011 Statement of Work (SOW)" | The work plan will be revised in accordance with this comment. |
| 232 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 15 | The correct acreage of the WGL Company site shown on all figures is "approximately 18 acres." Parentheses around OU1 and OU2 are misplaced. The text should read, "surface soil and subsurface soil (Operating Unit 1 [OU1]), as well as to groundwater, surface water, and river sediments (OU2)." | The work plan will be revised in accordance with this comment. |
| 233 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 16 | The sentence "In accordance with the above noted 2011 RD/RA scope of work..." should read, "In accordance with the 2012 SOW that includes the OU2 RD/RA..." | The work plan will be revised in accordance with this comment. |
| 234 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 16 | Correct the Park name to "National Capital Parks- East", not Capitol. | The work plan will be revised in accordance with this comment. |
| 235 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 16 | Update the text because the Poplar Point site encompasses an area of approximately 96 acres, not 44 acres. | The work plan will be revised in accordance with this comment. |
| 236 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 16 | Replace this text, "Currently, NPS is in the process of reviewing the draft RI/FS work plan." with "Currently, NPS and DDOE are in the process of reviewing the draft RI/FS Work Plan." | DDOE is the lead agency with regard to the preparation of the RI work plan and has solicited input from the NPS (and others) during the preparation of the statement of work and the work plan. This collaboration has included the submittal of the draft document for NPS review and comment. No changes will be made to the work plan in response to this comment. |

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| 237 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.6.2 | 20 | Fort McNair and Naval Support Facility Anacostia are discussed in this section, so why are they not included in Section 3.1.2.1 and shown as Cleanup Sites on the figures? | Please see the response to Comment #188. Since the initial data review identified only several minor LUST sites (Table 2.3) at Joint Base Anacostia Bolling (JBAB) and Joint Base Myer - Henderson Hall (Fort McNair), these facilities were not considered as cleanup sites of equivalent significance to the sites shown on the figures. Based on Region III information provided in their comments to the work plan, significant cleanup site(s) have been identified at JBAB and these site(s) will be included based on the site boundaries shown in the documents obtained. If specific site(s) are identified for Fort McNair, they will likewise be added to the figures. |
| 238 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 2.7 | 21 | As stated in the comment on Section 2.6.2 regarding data from the Kenilworth Landfill, multiple sediment samples are available from after 2000. Will these be added to the dataset? | As noted in Section 2.6.1, all data available in electronic (database or spreadsheet format) were used to develop the project database. Data available only in other formats (e.g., portable document file [pdf], or in paper copy) were not included. If NPS is able to provide the sediment data referenced by the commenter in database or spreadsheet format, the data will be added to the project database. |
| 239 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Figure 2.1 | 11 | Label the O Street CSS outfall on Figure 2.1. | The work plan will be revised in accordance with this comment. |
| 240 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 2.2 | 22 | The Kenilworth Landfill sampling data is discussed in Section 2.6.2. Shouldn't it be included in this table? This comment also applies to Table 2.4. | Please see the response to Comment #238. |
| 241 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.2 | 24 | Data collected from on-shore borings at various sites suggest that the River channel (either natural or dredged) may intersect one or more gravel layers which extend from onshore out under the River. If present, these layers may provide a preferential pathway for dissolved contamination from onshore to enter the River, rather than the River being protected by clayey deposits as suggested by this section. The possibility of these layers should be acknowledged in the CSM, and deep sediment cores, as well as deep and shallow pore water samples, should be included in the work plan to evaluate the potential contaminant contribution via this pathway. This comment also applies to Section 4.3.1. | As shown by Figure 3.1 which graphically portrays the CSM and as noted in Section 3.1.2, groundwater discharge is noted as a potential source for sediment contamination. Text will be added to this section to indicate that groundwater discharge will occur preferentially where coarse grained deposits intersect the river bottom which is most likely expected to occur in the proximity of the Northeast Branch and Northwest Branch confluence, where coarse grained material deposition is dominant. Downstream from this area, however, deposition is dominated by silt and clay sized deposits which will impede groundwater discharge. |
| 242 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.2 | 24 | NAPL seepage from sites that border the river may also be a potential source of contamination not considered in this section or in the CSM. | As noted in the response to Comment #241, groundwater discharge is accounted for in the CSM. We agree that small amounts of NAPL discharge may occur one or two of the cleanup sites (Washington Gas Light, for example) that border the river. However, in the CSM, we think it is appropriate to include these inputs with the groundwater component of the CSM, for perspective. No changes will be made to |
| 243 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.2 | 24 | The statement that "the predominant sources for contaminated groundwater are likely the environmental cleanup sites (six of which are currently known) that border the river and have documented groundwater contamination issues" is not defensible and may be inaccurate. Documented groundwater contamination may be a relatively small portion of the actual groundwater contamination from undocumented groundwater contamination sites, a point which stresses the importance of a uniform distribution of sediment and pore water sampling locations without bias toward known contaminated sites. | We make the statement that the six cleanup sites are likely the predominant sources for contaminated groundwater to the river in the context of a CSM. Specifically, our working model is that these sites are the significant sources of contaminated groundwater. However, we will interpret all of the RI data collected objectively, regardless of whether the samples are from near one of the six site or remote from them. In so doing, we test the CSM and may conclude that the theory of groundwater contamination existing only near the six sites is incorrect and the CSM will thus be modified. Conversely, we may conclude that the data are unresponsive of documented contamination in groundwater having a measurable impact to sediments, and thus the CSM would be modified accordingly. |
| 244 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.2.1 | 25 | Amend this part of the sentence: "Portions of the fill area directly contact the river or" because it implies that landfill waste was placed in the existing Anacostia River. The referenced document (E & E, 2007) states, "During the construction of the former District landfill, approximately 200,000 cubic yards of fill were placed as a barrier between the municipal garbage and the Anacostia River, Watts Branch, and Kenilworth Marsh." The same document states that wastes are in contact with a portion of Kenilworth Marsh, but this is not the Anacostia River. Currently, this area is a mud flat and is not typically covered with surface water. As detailed in the comment on Section 2.6.2, page 13, the statement that landfill wastes at KPS were placed in the river may refer to lakes east of the existing Anacostia River. Please change the last sentence in this paragraph to "A supplemental groundwater study at this site will conclude in 2014." | Please see the response to Comment #227. The last sentence will be revised in accordance with this comment. |

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| 245 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.2.1 | 26 | Change the acreage of the WGL East Station site to "approximately 18 acre." Remove the portion of the sentence in the WGL East Station paragraph that states "NAPL migration is currently being controlled and". Amend the following sentence to "The extent to which groundwater discharge to the adjacent Anacostia River is controlled hydraulically by a pump and treat system will be evaluated during the | The text will be revised in accordance with this comment. |
| 246 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.2.2 | 29 | The discussion on tributaries should indicate that these tributaries receive high volumes of flow from storm sewers. For example, USFWS identified 41 stormwater outfalls and 13 pipes that discharge in the District portion of Watts Branch. Reference: US Fish & Wildlife Service, "Watts Branch, Washington DC: Watershed and Stream Assessment" CBFO-S02-03. | The text will be revised to indicate that some of the tributaries receive large portions of their flow from storm sewers. |
| 247 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.3 | 30 | These constituents are then removed from the Anacostia River either by deposition in the lower portion of the estuary... What estuary is this sentence referencing? If it is the Anacostia River, it is incorrect to say that contamination is removed from the Anacostia River. | By definition, the tidal Anacostia River is an estuary. The referenced text states that through the process of sediment deposition, contaminants sorbed to suspended sediments are released from the water phase to the sediment phase. For clarity, the text will be revised to state "...constituents are then removed from the Anacostia River (water phase) either by..." |
| 248 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.1.3 | 30 | The seawall is not discussed in this document, but it has a significant effect on surface erosion, non-point surface run-off, and uncharacterized point discharges (shown in Figure 3.1 as transport mechanisms). The effects of the existing seawall should be discussed and the location should be shown on a figure. The areas where the seawall is not present should be considered when determining sampling locations. | The available information regarding the seawall will be gathered via web search and summarized with the site dredging history in Section 2.2. We agree that the seawall might have an influence on river sedimentation in areas where the seawall has deteriorated. |
| 249 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.2.2 | 34 | Last word in the first paragraph, consider using "factors" instead of "features" | The last sentence of the first paragraph of Section 3.2.2 will be revised in accordance with this comment. |
| 250 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.2.2 | 35 | The text should state that bald eagles are also present. | The list of omnivorous and carnivorous birds that forage in the river will be revised to include bald eagles. |
| 251 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.2.2 | 35 | The text should also include fox in the list of omnivorous mammals. | The text will be revised as suggested. |
| 252 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.2.3 | 35 | Second paragraph last sentence, consider inserting "invertebrates" (ex. tree swallows feed on the wing over marsh, often on insects whose larval stages were in marsh sediments) | The text will be revised as suggested. |
| 253 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.3.2 | 36 | Insert "and Maryland" at the end of the first sentence. | The first full sentence of Section 3.3.2 will be revised in accordance with this comment. |
| 254 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 3.3.2 | 36 | Adjust the second sentence of the third paragraph to include "workers engaged in environmental restoration and research" | The text will be revised as suggested. |
| 255 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.1.1 | 37 | The term DQO is identified in the EPA DQO process guidance as the performance or acceptance criteria, "typically expressed as tolerable limits on the probability or chance (risk) of the collected data leading you to making an erroneous decision." As such, the objectives stated are not the DQOs. | The presentation of the DQOs in the work plan are more general in nature. Details on DQO metric thresholds and limits are addressed in the QAPP. |
| 256 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 4.1 | 39 | A significant part of the problem in Step 1 is identifying the most significant sources of contamination in the RI to focus the FS. Identifying potential sources is not as important as identifying the most significant sources; therefore, relative mass contributions to the river become an important goal of the study so that limited resources will be focused on areas that impart the highest contaminant impact to the river. | Step 1 will be revised from "identify potential sources" to "identify the potentially most significant sources." |
| 257 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 4.1 | 39 | To be consistent with guidance, Step 2 would be a set of decision statements written according to the following template: "Determine whether... [some unknown environmental conditions/issues/criteria addressed by the principal study question] require (or support)... [taking one or more alternative actions]." The generic goals presented do not include the required problem statement or possible decision. | Please see the response to Comment #255. |
| 258 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 4.1 | 40 | Step 4 should also identify the sediment depths to be investigated. These are misplaced in Step 5. | The text will be revised in accordance with this comment. |
| 259 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 4.1 | 40 | Step 6 states "Data that meet the DQOs and fulfill project goals will be deemed acceptable." As stated in the guidance, the acceptance or performance criteria presented in Step 6 are the DQOs. Will confidence intervals be applied when using the data for risk assessment? Sampling methods should be provided in Step 5, not Step 6. | Please see the response to Comment #255. |
| 260 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 4.1 | 41 | Step 7: The sampling locations and spacing shown in Figures 5-1 and 5-2 are insufficient to determine unknown contaminant contribution areas and focus on known contaminant contribution areas. Pore water sampling locations are particularly insufficient in quantity. | We disagree that the sample locations and spacing are insufficient. When combined with the existing data collected in the project area, spatial coverage is sufficient to identify any unknown contribution areas. Similarly, we believe that the number and distribution of sediment pore water locations are sufficient to complete the characterization. Although not anticipated at this time, additional pore water sampling may be conducted in follow on design efforts. |
| 261 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 4.1 | 41 | In-situ sediment shear strength measurements (vane shear and penetration tests) should be included as a relatively inexpensive method of obtaining data to evaluate sediment stability and remedial options: e.g. capping and/or dredging. This comment also applies to Section 4.2.7.4 and 5.1.2, and Table 4.1 | Although these tests are not currently planned, they will likely be required at a later stage once areas requiring capping or dredging are identified. |
| 262 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2 | 42 | Nature & Extent of Contamination: Add Potomac River sites (above Georgetown, near Woodrow Wilson Bridge, for instance. Possibly replacing Tidal Basin site(s)? The idea is to determine if issues are metro-DC-wide... or primarily Anacostia River issues. This could be particularly important/useful for comparing fish tissue data. | The water bodies that define the current study area (tidal Anacostia River and Washington Channel) flow through densely populated portions of the city and, therefore, are critical to characterizing the risks posed by sediment contaminants. At approximately 11 miles, the current study area is ambitious. Increasing the area as suggested by this comment would make the study unwieldy and reduce its effectiveness by spreading the same resources over a larger area. |
| 263 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2 | 42 | BTW: the Tidal Basin is designed for one-way flow, with water entering at West Potomac Park gate, and exiting at the head of the Wash Channel. Moreover, doesn't the Tidal Basin have known outfalls with contaminants from Bureau of Engraving, etc.? Wouldn't we want to get above such known hot spots? | Please see the response to Comment #262. |

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| 264 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2 | 42 | The upper tidal limit is referenced often in the text; it would be helpful if this location was pointed out on the figures for Section 4. | The upper tidal limit is by definition the upstream limit of tidal influence. For clarity, this definition will be added to the introduction of Section 1.4. We believe that this change will provide sufficient clarity to the document and will make the modification of the figures unnecessary. |
| 265 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2 | 42 | Should this study add Kenilworth Marsh to the bulleted list since Kingman Lake is listed and similar. | Please see response to Comment #108. |
| 266 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2.1 | 43 | Consider matching the referenced sections of the river to the defined reaches listed at the beginning of Section 4.2. | Although the existing data were reviewed in accordance with the reaches defined at the beginning of Section 4.2, the results of that evaluation suggested the spatial subdivision used in Section 4.2.1 as optimal for data summarization purposes. The nine reaches defined at the beginning of Section 4.2 are useful to break the river up into a reaches of a manageable length for sample planning purposes and not necessarily for discussion purposes. No changes will be made to the work plan as a |
| 267 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2.7.2 | 56 | Change "WGL East Station RD/RA" to "WGL East Station OU2 RI/FS" | The work plan will be revised in accordance with this comment. |
| 268 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2.7.2 | 57 | More details should be provided regarding the comparison of the new data with the ANS 2000 data set. Will samples collected at identical locations be compared, and if so which sample locations are included in both data sets, and what relative percent differences will be considered acceptable when comparing samples? Will statistical comparison methods be used on groups of samples, and if so, what methods will be used, what is the measure of acceptable reproducibility, and how will the groups of samples be determined? This comment also applies to Section 6.1. | A discussion of the approach for comparing the resample results with the ANS 2000 results is provided in the Surface Sediment portion of Section 4.2.7.2. |
| 269 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.2.7.3 | 58 | Collection of crayfish and shellfish is not proposed. Crayfish collected incidentally will be analyzed per Table 5.4, note 8. However, given the likely consumption of crayfish by predators (mink for instance), and shellfish by predators and possibly humans, consideration should be given to deliberately collecting crayfish with traps, and shellfish with rakes, dredges, shovels or other suitable means. (This comment also applies to Section 5.0 and Tables 5.3 and 5.4) | We agree that crayfish may be an important food item for both humans and ecological receptors. The WP will be revised to include purposeful as well as incidental collection of crayfish in three locations. Samples will be analyzed for whole body (minus the exoskeleton) concentrations because most birds and mammals do not digest the exoskeleton. Soft tissues of clams will be analyzed at three locations. |
| 270 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.3.1 | 58 | If the most significant ongoing sources of sediment contamination include CSS outfalls, SSOs, and tributaries, why aren't those being more closely investigated in this study? Include all of the tributaries that connect to the Anacostia on one of the Figures. | We believe that the tributaries are the most important sediment sources, Northeast Branch, Northwest Branch, and Lower Beaverdam Creek in particular. As indicated in the Rationale column of Table 5.1, a key objective of a large fraction of the sample location is to assess the contributions from outfalls and tributaries. |
| 271 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 4.3.2 | 59 | Update the statement: The pump and treat system at WGL was first installed in 1976, not 2000. The current configuration of wells was completed in 2003. | The work plan will be revised in accordance with this comment. |
| 272 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Figure 4.4, 4.9, 4.10, 4.11. | 60 | The AWT AOC shading is very similar in color to the orange and pink dots, making the dots very difficult to see. Change the dot color. | We will review the symbol shading on the noted figures and adjust as appropriate. |
| 273 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.0 | 61 | Are there plans to conduct any background sampling for comparison? | Please see response to Comment #141. |
| 274 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.2 | 63 | 31 of the 134 proposed sampling locations shown on Figure 5-1 and discussed in Table 5.2 are co-located with previous samples. If spatial coverage is desired, why repeat sampling locations? Presumably the intent is to compare the new data with previous data, but given the temporal difference and inevitability that these underwater sampling locations cannot be exactly reproduced, the value of repeated sampling is questionable. Instead, we suggest redistributing most of these surface sampling locations to produce greater spatial distribution that does not only focus on suspected or known areas of high concentrations. | As discussed in Section 4.2.7.2, the ANS 2000 data set is a key component of the project database. If possible, DDOE wishes to leverage this data set for the purposes of the current investigation. The re-sampling noted by the commenter is necessary to ascertain whether the ANS 2000 data is historical (e.g., unrepresentative of current conditions) or can be leveraged to augment the sampling planned for the RI. We believe that a sufficient sense of the representativeness of the ANS 2000 data will be obtainable from the planned oversampling. No changes will be made to the work plan as a result of this comment. |
| 275 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.2 | 63 | Are the near shore sediment sample locations correlated with locations where the seawall is discontinuous? | Near shore sediment locations are designated for both human health and ecological risk assessments, as shown in Table 5-2. Human health locations tend to be near fishing piers and other areas where people are known to access or enter the river. Ecological stations tend to be located away from areas of intense human activity. |
| 276 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.2 | 63 | Additional near shore sediment samples should also be collected based upon ecological risk pathways: e.g. sources of food for birds and mammals, such as shellfish beds and crayfish habitats. | Please see response to comment #269. |
| 277 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.2 | 63 | Will the near shore sediment samples be collected from portions of the river exposed at low tide and, therefore, available to avian and/or mammalian predators? Will the samples from locations near the center of the river be collected from areas normally dredged or from undredged areas? Which/how many samples will be in dredged areas, deep undredged areas, and the periodically exposed environments? | Depending on location, water depth will likely range from zero, to intermittent water depending on tide level, to fully inundated irrespective of tide level. Zero water and intermittent water sampling will occur in the northern portion of Kingman Lake and in the portion of the river upstream from the Bladensburg Marina. Shallow or no-water conditions were observed in these areas during the bathymetric survey. With the exception of these shallow to no-water areas, most other near shore samples are not exposed at low tide. Deeper riverine samples will be preferentially collected from undredged areas. |
| 278 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.2 | 63 | Additional documentation regarding limiting deep sediment sample collection to 10 feet deep should be provided: e.g., evidence that no contamination is present above concentrations of concern beyond 10 feet. | The collection of sediment cores to a depth of 10 feet will likely provide sufficient geological and contaminant concentration data to support DQOs. It should be noted that the depth of sample collection of deeper sediment samples is not limited to 10 feet. Deeper samples will be collected if field conditions suggest (e.g., visible contamination) that such sampling is warranted. |
| 279 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.2 | 64 | The text states that sampling will continue to greater depths if screening indicates the potential that contamination extends beyond 10 feet deep; however, this may require different core tubes or even a different set up. In the FSP, please provide additional detail describing this contingency and how the sampler will decide it is appropriate. | The QAPP and FSP will provide details regarding the equipment used for the collection of sediment cores, the capability to core at depths greater than 10 feet, and the decision process for determining the need for deeper coring. |
| 280 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.2 | 64 | Some PAHs are known to occur naturally in sediments. We suggest performing PAH fingerprinting analysis on the subset (20%) of sediment samples. | Specific approaches for the evaluation of the analytical data generated during the RI will be determined during the data evaluation phase conducted in support of the RI. |
| 281 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.3 | 64 | The text states that pore water sampling locations were selected to provide spatial coverage of all reaches, but the locations on Figure 5.2 do not support this. For example, all pore water sampling locations in R2 are located along the eastern shore, and R5 is represented by only a single sample. As these data are important for risk assessment, we suggest increasing the total number of samples and ensuring that both sides of the river are selected for sampling. | The location of pore water stations has been revised to collocate them with benthic invertebrate exposure locations. Section 5.1.3 of the WP will be revised. |

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| 282 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.3 | 64 | More details would be helpful regarding the sampling methods that will be used to collect pore water samples. In addition, consider collecting additional pore water samples at greater depths, so you can characterize contaminant transport related to groundwater discharge. Also, how will you minimize disturbance to the samples? | Specific details regarding pore water collection procedures will be provided in the QAPP and FSP. The project team believes that an appropriate number of pore water samples are specified. No changes will be made to the work plan as a result of this comment. |
| 283 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.3 | 64 | The vertical gradient, sample depth and sample elevation should be measured and recorded during pore water sampling. Pore water sampling should be conducted near periods of low tide in order to evaluate worst-case conditions of contaminant migration into the River, and the tide elevations and timing at the time of sample collection should be recorded. | Pore water will be collected from the top six inches of sediment. Since the river is a regional groundwater discharge boundary, quantifying the gradient is unnecessary and an unproductive use of resources. The specific parameters that we will record during pore water collection will be specified in the QAPP and FSP. No changes to the work plan will be made as a result of this comment. |
| 284 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.4 | 65 | This section states that toxicity testing will be performed at half or more of the BI locations, with benthic invertebrate collection and testing at remaining locations. Is it correct that no samples will be analyzed for both toxicity testing and benthic invertebrate tissue? If so, we recommend performing both at several sampling locations. If this is not correct, please clarify in this section and Section 5.1.5. | Please see response to comment #175. We will consider conducting both toxicity tests and analyzing benthic invertebrate tissue at up to three locations. |
| 285 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.1.4 | 65 | Note in this section that benthic invertebrate numbers and species fluctuate throughout the year therefore collections could be timed with that in mind. | We acknowledge this comment. |
| 286 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.2 | 67 | Add an additional near shore sampling point where the community boat house and boat clubs are situated along the Anacostia River. | We will consider adjusting sampling locations to accommodate this request. |
| 287 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.2 | 67 | Kenilworth Park north has an area where the seawall is discontinuous and fishing occurs. We suggest a surface water sampling location be added in this area. | We will consider adjusting sampling locations to accommodate this request. |
| 288 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.2 | 67 | The sample depth and sample elevation should be measured and recorded during surface water sampling. A rationale for the time of year of sampling, sample depth, and timing of the sampling (relative to tidal fluctuations and precipitation events) should be provided to evaluate worst-case conditions of contaminant presence or migration into the River. The tide elevations and timing at the time of sample collection should be recorded. | The information requested by the commenter will be provided in the QAPP and the FSP. No changes will be made to the work plan. |
| 289 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.2 | 67 | It is recommended that the surface water and fish tissue sampling be performed after the results of the sediment sampling have been received so that you can use the results to reevaluate the locations and number of samples to be analyzed for PCB congeners, and dioxins and furans. This will ensure that areas with these compounds in sediment can be targeted. After evaluating sediment results, we recommend the following ratio be used for surface water sampling: 10% of the locations at "clean" sediment areas and 90% at high dioxin/furan concentration areas. In addition, by sampling the surface water at a different time than sediment, surface water samples are less likely to be contaminated by recently disturbed sediments. | We appreciate the value of a phased sampling approach and we recognize that it may be necessary to conduct additional field work at a later time. However, this field effort has been designed to maximize the benefits of collecting various samples during a short time period. In a dynamic temperate ecosystem such as the Anacostia River, confounding variables associated with seasonal life histories of organisms, weather, and large-scale hydrological events are best controlled by minimizing the duration of sample collection. Greater correlation between field sediment chemistry and laboratory toxicity tests is realized when these measurements are contemporaneous. In addition, because the RI aims to characterize the nature and extent of contamination along the entire tidal river, the broad sample coverage proposed in the WP is considered appropriate. Regarding concerns about sediment sampling causing contaminated water samples, the field sampling procedures account for such disturbances by approaching water sampling |
| 290 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 5.3 | 68 | Add fish collection from locations in the Potomac River for comparison. Please also include which fish species will be targeted for testing. | Please see response to Comment #262. |
| 291 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Figure 5.1 | 68 | To evaluate the potential contamination contributions from the various outfalls and tributaries, shallow sediment samples should be collected adjacent to each outfall. In particular, shallow sediment samples should be collected at the following locations (from upstream to downstream; see Figure 3-2 for outfall locations): 1) Downstream of PEPCO, left bank at emergency relief outfall NPDES008, and MS4 outfalls F-090-064 and F-477-827; 2) At the Texas Avenue tributary, and associated MS4 outfalls downstream on the left bank (F758-282, F159-618, F336-662, F367-629, F818-706 and F792.447. 3) Ten additional CSS and/or MS4 outfalls along the right bank near, and downstream of, the Washington Navy Yard and Southeast Federal Center. 4) Each of the MS4 outfalls along the left bank of the Washington Channel. | We will consider the recommendation provided in this comment. In addition, please see the response to Comment #28. |
| 292 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 6.3 | 70 | The RI report should include multiple lateral and longitudinal cross sections showing the vertical distribution of contaminants. | The project team will review various approaches for presenting the concentration data; multiple lateral and longitudinal cross sections are one of the potential approaches that will be considered. |
| 293 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 6.3 | 70 | The last paragraph states that the risk implications of potential exposure to subsurface sediments will be evaluated. What about surface sediments and surface water? The last paragraph of this section on the next page includes all sampled media. | The referenced text will be revised to indicate that, in addition to the evaluation of exposure to subsurface sediments, exposure to surface sediments and surface |
| 294 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 6.3 | 71 | The document says the RI will evaluate fate and transport of contaminants. Additional detail should be provided as to how sediment transport (or stability) will be determined or modeled including, but not limited to, the effects of future dredging, transport of dredged sediments to other areas such as Kenilworth Marsh, and the exposure of deeper sediments after dredging. Further explanation is needed regarding how the TAMWASP or other models will accomplish this, including an evaluation of any additional hydrologic, bathymetric, and grain size data necessary. | Updating the TAMWASP model will be conducted as a separate task external to the RI. A potential application of the model will be to assess the re-suspension of sediments and the effects of dredging. However, given the current stage of the project, the broad level of discussion provided in the referenced text is appropriate. No changes will be made to the work plan as a result of this comment. |
| 295 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 7.0 | 73 | Sediment sampling will be performed in the river at the six environmental sites, so why would they be excluded from the risk assessment? This approach assumes that contaminants from these sites stay within the areas mapped and that these areas are unaffected by other contaminant sources, which is an unreasonable assumption for a tidal river. | The WP will be revised to clarify that all available sediment sample data will be incorporated into the risk assessments. |

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| 296 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 8.2.2 | 87 | Given the soft silt sediment present in much of the study area, anyone stepping in the sediment (and boat anchors) will sink several feet, so exposure to waders, clam catchers, boaters, and swimmers is likely to include depths greater than 6 inches. Additionally, the impacts of future dredging may expose deeper sediments, resulting in them being nearer or at the sediment surface. | While it is true that a person may sink deeper than 6 inches into soft sediment, it is highly unlikely that the same person will do so repeatedly. The comment raises concern that a person may sink "several feet" into soft sediment. However, sinking more than a few inches into soft sediment causes other safety issues, including drowning. It is standard practice to evaluate the top 6 inches (at most, 12 inches) of sediment for primary recreational receptors (swimmers, boaters, general recreationalists walking along edge of river). Deeper exposure would result in safety issues that would be self-limiting for most recreational receptors. The typical person who jumps out of a boat and sinks past the knees in sediment will not generally do it again. Instead, people are expected to take corrective action such as moving to a different anchoring, swimming, or clamping spot or using devices that prevent sinking into the sediment (flotation devices, clamping tools). |
| 297 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 9 | 93 | The document does not provide an adequate description of the NRDA process for the public to understand this aspect of the work plan. Section 9 provides a brief outline of some of the tasks and documentation requirements of a NRDA; however, it reads like a brief statement of work for a contractor. It would serve the reader better if it outlined the phases of an NRDA (Preassessment, Assessment, and Post Assessment), as outlined in the regulations, very briefly describe what the goals of each of these phases are, and outline important document products. The nuances of each phase are too cumbersome to describe and many items are left out of this description. Additionally, Section 9 is written in such a manner that Tetra Tech will perform this work - this section should be written in a manner that provides description of the work to be performed regardless of whom performs the work. | Section 9 will be revised to provide a more general discussion of the NRDA process that will be easier for the public to understand. The discussion will include a summary of the regulatory requirements with respect to the identification of trustees, the formation of a Trustee Council, and other considerations. |
| 298 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 9 | 93 | It appears that DDOE & Tetra Tech are focusing primarily on lost recreational use and collecting information (e.g. fish tissue data) that can be used to support a NRDA claim. Natural resources are discussed in Task 1, but only in reference to having "social, recreational, or economic value to various public user groups". Task 1 also specifically mentions fish tissue advisories and violations of water quality criteria. All of this information can be used in HEA analysis, but it appears that the primary interest is in determining damages to human activities including parks and recreational facilities. Damages to ecological resources are included in the NRDA but almost as an afterthought. Establishment of a Trustee Council will guide the NRDA activities to determine the extent of damages to any impacted ecological resources and their services in a mutually agreeable effort. | Please see response to Comment #297. |
| 299 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Table 10.1 | 95 | Update these dates with the correct preparation dates for the Work Plan and CIP and the correct public comment period end dates. | Table 10.1 will be updated with the correct dates. |
| 300 | Emily Ferguson | U.S. DOI National Park Service | Federal Government | Section 11.0 | 97 | The reference for the CH2M Hill document should be moved out of the Champ, 1979 reference. | The text will be revised in accordance with this comment. |
| 301 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | Eliminating field screening as a method of sample site selection. As PCBs are a concern in even low concentrations, ARK is concerned that field screening will not identify all areas of concern. A uniform methodology will produce a more comprehensive picture of the scope and nature of PCB contamination. | We agree that field screening is ineffective to identify preferable sampling intervals for PCBs. Even so, field screening is an essential tool for identifying sampling intervals. Visual assessment, organic vapor analysis, and sample odors indicate zones of bulk contamination. Given that over 300 sediment samples (including 209 PCB congeners in 100 percent of surface sediment samples and 20 percent of subsurface samples) will be sent to an analytical laboratory for chemical analysis, the project team believes that PCB concentrations will be characterized to best extent. |
| 302 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | All sediment samples should be analyzed for cogeners, monomers or aroclors. While the current sampling plan calls for aroclor analysis of 20% of samples, a comprehensive analysis of all samples for specific cogeners, monomers or aroclors may help the agency identify parties responsible for the contamination. | All surface sediment samples will be analyzed for 209 PCB congeners. Additional recolor and congener information will be collected to support specific needs, such as human health risk assessment. |
| 303 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | Sediment samples should be archived and preserved for future analysis. It is reasonable to assume that future analysis of PCB samples may become necessary for exploring remediation techniques and/or for liability allocation. In both cases, an archive of samples would be helpful. | The project team agrees that some sample archiving is appropriate. Although we intend to archive some of the subsurface sediment samples based on field judgment, we do not intend to archive all samples. We intend to analyze 100 percent of surface sediment samples for all PCB congeners. No changes will be made to the work plan in response to this comment. |
| 304 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | Include a review of recently published research indicating new sources of chlordane. | We agree that a better understanding of chlordane isomers and their fate and transport would be beneficial. This analysis, however, will be conducted to support data analysis for the RI report. No changes will be made to the work plan in response to this comment. |
| 305 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | Make every effort to fingerprint chlordane. Fingerprinting the decomposition pattern and/or associated contaminants of found chlordane may lead to discovery of the original manufacturer. | We acknowledge this comment. |
| 306 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | 30-Day initiation period. The proposed schedule states that a remedial field investigation shall be initiated within 180 days of the approval of the work plan. We request that this time be shortened to 30 days. | The proposed schedule states that remedial investigation activities are planned to be initiated within 180 days because of the additional activities that need to be addressed before the fieldwork can commence. Such activities include the Sampling and Analysis Plan and Quality Assurance Project Plan and other such documents. |
| 307 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | Immediately prepare and submit permit applications. Federal permitting agencies have demonstrated a lack of timeliness, as demonstrated recently in the Pepco clean up. Pepco applied for a permit on August 22, 2012 but received no action from NPS until September 2013. The permit was again suspended because of the Government Shutdown. To avoid delays, ARK asks that DDOE immediately apply for federal permits to perform the RI. | We acknowledge this comment. |
| 308 | Mike Bolinder | Anacostia River Keepers | Environmental Group | General | | Concurrently conduct the FS as regulations allow. Anacostia Riverkeeper requests that, as allowed by EPA's CERCLA guidelines, DDOE concurrently perform as much of the FS simultaneous to the RI as possible. | The purpose of the RI is to characterize the site to support the FS. The project team disagrees that the FS can be conducted concurrently with the RI. Data collected subsequent to the start of the FS may prove key to designing the FS. Therefore, to ensure proper design of the FS, the commencement of the FS will occur after RI data collection is completed. |

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| 309 | Lori Gould | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from healthendangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decadesold toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 310 | Christian Owen | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from healthendangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decadesold toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 311 | Haja Kromah | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from healthendangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decadesold toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 312 | Andrew Kolb | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from healthendangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decadesold toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 313 | Michele Allen | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from healthendangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decadesold toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 314 | Caroline Hallam | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from healthendangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decadesold toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 315 | Justin Lini | None | General Public | General | | My name is Justin Lini and I am a resident of the Kenilworth-Parkside neighborhood of the District of Columbia. I strongly support the District of Columbia's effort to conduct a Remedial Investigation and Feasibility Study of toxics in the Anacostia estuary. Removing these toxics are important to me because I would like to see a restored and healthy river that benefits all the communities along its banks. I want to be able to freely enjoy the Anacostia as soon as possible, therefore I request the following changes be incorporated into the Remedial Investigation workplan: · A detailed timeline that will require the investigation to be complete by 2017. · An expedited process for the executive branch to review documents. · Beginning the feasibility study as soon as field work for the remedial investigation is underway so both studies proceed simultaneously. · Immediately applying for NPS and US Army Corps permits. I am excited that the District is working on a solution to municipal separate stormwater pollution and combined sewage overflow pollution. Both of these solutions should work in concert with the toxic sediment project in order to fully achieve a fishable swimmable Anacostia. | Cleanup of the Anacostia will follow the RI/FS process established under CERCLA. The process is multistep beginning with the RI and proceeding to the FS and ending with the establishment of a record of decision and proposed plan for conducting the cleanup. Although DDOE intends to move through the process as efficiently as possible, it is not possible to commit to a specific date when the investigation will be complete. |
| 316 | Brenda Lee Richardson | None | General Public | General | | My name is Brenda Lee Richardson and I am a resident of Ward 8. I strongly support the District of Columbia's effort to conduct a Remedial Investigation and Feasibility Study of toxics in the Anacostia estuary. Removing these toxics are important to me because I would like to see a restored and healthy river that benefits all the communities along its banks. I want to be able to freely enjoy the Anacostia as soon as possible, therefore I request the following changes be incorporated into the Remedial Investigation workplan: · A detailed timeline that will require the investigation to be complete by 2017. · An expedited process for the executive branch to review documents. · Beginning the feasibility study as soon as field work for the remedial investigation is underway so both studies proceed simultaneously. · Immediately applying for NPS and US Army Corps permits. I am excited that the District is working on a solution to municipal separate stormwater pollution and combined sewage overflow pollution. Both of these solutions should work in concert with the toxic sediment project in order to fully achieve a fishable swimmable Anacostia. | Please see response to Comment #315 |
| 317 | Kolya Braun-Greiner | None | General Public | General | | My name is Kolya Braun-Greiner and I am a resident of Takoma Park, MD near Sligo Creek in the Anacostia watershed. When I see pictures of fish with lesions caused by toxics in the water I grieve for God's creation and for our children. We can do this -- we can clean up the environment, especially our most precious element for life, water. I strongly support the District of Columbia's effort to conduct a Remedial Investigation and Feasibility Study of toxics in the Anacostia estuary. Removing these toxics are important to me because I would like to kayak and swim in local waters without fear of toxics or risk to my or my family's health. I want to be able to freely enjoy the Anacostia as soon as possible, therefore I request the following changes be incorporated into the Remedial Investigation workplan: · A detailed timeline that will require the investigation to be complete by 2017. · An expedited process for the executive branch to review documents. · Beginning the feasibility study as soon as field work for the remedial investigation is underway so both studies proceed simultaneously. · Immediately applying for NPS and US Army Corps permits. I am excited that the District is working on a solution to municipal separate stormwater pollution and combined sewage overflow pollution. Both of these solutions should work in concert with the toxic sediment project in order to fully achieve a fishable swimmable Anacostia. | Please see response to Comment #315 |
| 318 | Kenneth Prater | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from healthendangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decadesold toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 319 | Suzy Kelly | None | General Public | General | | My name is Suzy Kelly and I am a resident of Bethesda. I strongly support the District of Columbia's effort to conduct a Remedial Investigation and Feasibility Study of toxics in the Anacostia estuary. Removing these toxics are important to me because I would like to see a restored and healthy river that benefits all the communities along its banks. I want to be able to freely enjoy the Anacostia as soon as possible, therefore I request the following changes be incorporated into the Remedial Investigation workplan: - A detailed timeline that will require the investigation to be complete by 2017. - An expedited process for the executive branch to review documents. - Beginning the feasibility study as soon as field work for the remedial investigation is underway so both studies proceed simultaneously. - Immediately applying for NPS and US Army Corps permits. I am excited that the District is working on a solution to municipal separate stormwater pollution and combined sewage overflow pollution. Both of these solutions should work in concert with the toxic sediment project in order to fully achieve a fishable swimmable Anacostia. | Please see response to Comment #315 |
| 320 | Julia Herron | CSX Transportation | Commercial Entity | ns 1.1and 1.2 and General | 1 | The RI Work Plan states in Section 1.1 that an objective of the Remedial Investigation (RI) is to collect data to characterize site conditions to support the completion of a feasibility study. However, the Work Plan does not appear adequate to fully support that objective. As stated in Section 1.2, the Work Plan was developed to be consistent with the RI process established in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the National Contingency Plan (NCP), and the District's Brownfield Revitalization Act. As such, it focuses mainly on characterizing the nature and extent of hazardous substances in the sediments and their potential risk to human and ecological receptors. However, the ultimate remedy for the river will need to consider other substances and parameters as well. For example, as stated in numerous places within the document, there are TMDLs for the Anacostia River for PCBs, BOD, bacteria, organics (including pesticides and PAHs), metals, sedimentation, oil and grease, and trash. Hazardous substances are thus only a subset of the TMDLs issued by EPA for the river. To be fully effective, the ultimate remedy will need to address substances/parameters other than CERCLA hazardous substances. Moreover, the remedy will need to address ongoing releases of both hazardous substances and other substances/parameters in addition to existing contamination, in order to avoid recontamination of the remediated sediments. Thus, to meet the above-stated objective, we suggest that DDOE consider expanding the scope of the Work Plan to include substances/parameters other than hazardous substances subject to CERCLA, and to include investigations of ongoing releases as well as existing contamination. | The COCs for the RI are discussed in Section 3.1.1 and consist of the 126 chemicals included in the EPA Priority Pollutant list. This list is comprised of 28 volatile organic compounds (VOCs), 57 semi-volatile organic compounds (SVOCs) including 16 polycyclic aromatic hydrocarbons (PAHs), 18 pesticides, 14 metals, seven polychlorinated biphenyls (PCBs), and 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD). This list is comprehensive and includes the COCs (PAHs, PCBs, metals, and pesticides) that pose the greatest threats to ecologic and human health receptors associated with the Anacostia River (sediments, biota, and surface water). The project team agrees that BOD, bacteria, sedimentation, oil and grease, and trash are significant issues adversely impacting the quality of the river. We note that for each issue, other efforts external to the RI are addressing them. For example, as discussed in Section 3.1.2.2, DC Water is implementing the Long Term Control Plan that will essentially eliminate the uncontrolled discharge of raw sewage via CSS outfalls, thus significantly reducing pathogenic bacteria in the river. In addition, as noted elsewhere in our comment responses, DDOE is pursuing, in a separate effort, the characterization of the dissolved and total contaminant loads in the inflows of the major tributaries to the river. As a result of this effort, DDOE and other jurisdictions will understand how best to address any water quality issues identified in these tributaries. No changes will be made to the work plan in response to this comment. |
| 321 | Julia Herron | CSX Transportation | Commercial Entity | Section 1.4 | 2 | The Work Plan does not provide justification for limiting the focus of the RI to the river, and not also including the adjacent wetlands and floodplain. Also, the scope of the RI states the surface soils from Kingman and Heritage Islands are considered to be similar to the floodplain soil, but no justification or citation is provided. | Please see the response to Comment #108. |
| 322 | Julia Herron | CSX Transportation | Commercial Entity | Figure 1.1 | | The area near Fort Dupont Creek is indicated to be a "New AOC" (area of concern). The Work Plan provides no basis for designating this area of the River's sediments as a new AOC. In fact, this classification conflicts with the data and conclusions provided to DDOE in the EnviroScience (2013) report and the NewFields (2013) report (Appendix C to EnviroScience, 2013), which show that the contaminant concentrations in that area are comparable to those found throughout the river and do not stand out as being particularly elevated or of special concern. | The designation of the AOC near Fort Dupont Creek is consistent with the knowledge that a release of diesel fuel is documented at the CSX Benning Yard Office area, just upstream from the Fort Dupont Creek outfall. Regardless of the conclusions reached by previous investigations, all known responsible party (RP) sites where contaminant releases are known or suspected are identified as AOCs. To maintain objectivity of the RI, the extent of each AOC is based on (1) delineation of the area in the AWTA (2002) or AWTA (2009) as an AOC or (2) the channel segment adjacent to the site with known or suspected releases is designated as an AOC. |
| 323 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.4 | 9 | The statement that the Northeast and Northwest Branches constitute 60-70% of the total discharge (flow) for the Anacostia River has no citation. This statement conflicts with the statement on page 29 that these two branches make up 77% of the total discharge. | The text indicating that Northeast Branch and Northwest Branch contribute 60 - 70 percent of the flow to the tidal Anacostia River will be revised to be consistent with the information provided in Warner (et al. 1997) that concluded that these two tributaries contribute approximately 77 percent of the flow in the river. |
| 324 | Julia Herron | CSX Transportation | Commercial Entity | Sections 2.5 and 2.6.2 | 9-10 | The Work Plan notes that Scatena (1986) estimated that the total sediment load to the tidal Anacostia River includes 85% from the Northeast and Northwest Branches, both of which are outside the RI's study area. Both of these Branches have exceptionally high flux rates of pyrogenic PAHs in the suspended particles entering the tidal Anacostia. These PAHs are derived from urban runoff upstream of the tidal Anacostia, especially during storm flow (Foster et al., 2000). Any assessment and remedy for the tidal Anacostia River sediments should consider these tributaries to be persistent and prolific upstream sources of PAHs (and other COCs), just as the Work Plan currently considers the six named environmental sites that border the River. | We acknowledge this comment. |
| 325 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.5 | 10 | The report states: "Hydrodynamic and sediment contaminant transport modeling suggests that 90 percent of the sediment delivered to the tidal Anacostia River is trapped and deposited." But no citation is provided. What modeling is being referred to here? A brief review of Schultz (2003) does not indicate the same conclusion. | The following citation will be added to the text noted in the comment: (AWTA, 2002) which is documented in the reference section of the work plan as "Anacostia Watershed Toxics Alliance and Anacostia Watershed Restoration Commission, 2002. Charting a Course Toward Restoration: A Toxic Chemical Management Strategy for the Anacostia River." |
| 326 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.6.1 | 12 | The framework for the ongoing DDOE monitoring of MS4 outfalls that is to be completed in May 2015 does not include any hydrocarbon analyses. Given the importance of urban runoff to the Anacostia River system as a source of PAHs, it appears that the framework should include PAH measurements. These data would provide an important PAH flux rate to the tidal Anacostia from urban runoff within the District, akin to what the Foster et al. (2000) study has done for the Northeast and Northwest Branches. If that cannot be done under the NPDES permit, consideration should be given to conducting such PAH analyses as part of the RI. | We acknowledge this comment. |

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| 327 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.6.1 | 15 | The Work Plan's short summary regarding the concentrations of total PAH concentrations in sediments near the Fort Dupont Creek outfall (which is based on EnviroScience, 2013) fails to acknowledge that (irrespective of grain size and any potential effect that it may have had on concentration) chemical fingerprinting of the PAHs (and associated TPH) clearly showed that the source of these PAHs was urban runoff and not diesel fuel (NewFields, 2013 [Appendix C to EnviroScience, 2013]). In ignoring these chemical fingerprinting results, the RI Work Plan erroneously implies that diesel fuel was the source of the PAHs measured. The Work Plan should acknowledge these fingerprinting results. The Work Plan's summary regarding total PCB concentrations in surface sediments correctly states that concentrations within 150 feet of the Fort Dupont Creek outfall were "generally less than 100 µg/kg" but misstates the range of total congener concentrations found in surface sediments in the channel and away from the outfall to be "in the 200 to 500 µg/kg range." The actual range for the latter was 314 to 826 µg/kg (avg. 513 ± 209 µg/kg; n=8). In addition, the Work Plan fails to state that the concentration of total PCBs tended to increase with the depth of sediment, reaching concentrations up to 2,211 µg/kg in the deepest sediment intervals. The implications of this were discussed in NewFields (2013). | The discussion of the PCB results will be revised consistent with the information provided in this comment. Any discussion regarding the conclusions of previous investigations conducted at any specific RP site, including the results of the PAH fingerprinting that have been completed by NewFields on behalf of CSX will be considered during the preparation of the RI report, not the RI work plan. |
| 328 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.6.2 | 14-15 | It should be noted in the discussion of CSXT's Benning Yard that the fueling operations referenced in this discussion were performed prior to CSXT ownership and during the timeframe that Conrail and its predecessors operated the facility. Equipment associated with the historic fueling operations was removed in 2002. It should also be noted that CSXT also analyzed the sediment samples for oil and grease (HEM) and TPH (HEM-SGT) (using Method 1664A). Further, it should be explained whether the total PAH concentrations cited in the sediment sample summary are totals of the priority pollutant PAHs or are inclusive of the alkylated PAHs. | This comment covers several issues: (1) the text should provide additional details regarding historical ownership of Benning Yard, (2) the analyte list should be revised to include additional COCs that were included in the site investigation, and (3) the summary of PAH results should explain the specific PAHs that are being referred to. Responses are provided below: (1) The level of detail is considered appropriate for the summary-level discussion provided. The text notes that fueling operations were historically conducted. (2) The list of laboratory analyses conducted will be revised to include oil and grease (HEM) and TPH (HEM-SGT) (using Method 1664A) (3) The summarized PAHs include the 16 priority pollutant PAHs. The text will be revised to include this clarification. |
| 329 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.7 | 21 | The Work Plan states: "An assumption inherent in using data collected from up to 15 years ago is that sediment concentrations from these sampling events will reasonably approximate present day concentrations." However, McGee et al. (2009) reported that, at the upstream locations in the Anacostia River, most metals were lower in concentration in 2000 than in 1992. Total PCBs decreased an average of 74% at all stations between 1992 and 2000, except at the farthest downstream location. Overall toxicity, as measured by standardized sediment tests, decreased from 1992 to 2000 as well. While these trends are not consistent for every analyte, they should be considered when assuming that data from years ago will approximate present-day conditions. | We acknowledge this comment. In addition, we agree that the results of the McGee (2009) study are relevant and will be cited in the Work Plan. |
| 330 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.7 | 21 | The Work Plan briefly discusses the different numbers of PCB congeners measured in the multiple previous studies. There is no parallel discussion of the number of PAHs measured in different previous studies, which is known to be highly variable (per Table 2.4). Despite this variability, the discussions of the existing data in Section 2.6.2 refer only to "total PAH," without any qualification as to what "total" means in each study. This is important since concentrations of total PAHs when 51 PAHs are included (TPAH51, as discussed by NewFields, 2013) are expectedly higher and not comparable to those presented in previous reports, where the total PAHs included only 16 to 41 analytes. The Work Plan should define what is meant each time TPAH is referenced. | We acknowledge this comment. To the extent that information is available to do so, we will provide in Section 2.7 clarification of the numbers of PAH compounds included in the previous investigations. |
| 331 | Julia Herron | CSX Transportation | Commercial Entity | Section 2.7 | 22 | The Work Plan provides no definition of the depth that constitutes "deep" sediments. | In the deep sediments discussion in Section 2.7, the term "deep sediment" will be defined as sediment from depths of greater than 0.5 feet below the bottom of the |
| 332 | Julia Herron | CSX Transportation | Commercial Entity | Table 2.2 | | The total number of surface and subsurface sediment samples collected during the December 2011 EnviroScience sampling event needs to be confirmed. The number presented does not correlate to the data presented in the EnviroScience (2013) report. In addition, the "USFWS Triad Study" should be expanded to include a later reference to McGee et al. (2009). | We will review the number of samples from the December 2011 sampling event documented in EnviroScience (2013) against the numbers indicated in Table 2.2. In addition, we will add the McGee (2009) reference for the USFWS Triad Study. |
| 333 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.0 | 23-36 | The preliminary conceptual site model (CSM) in Section 3.0 (and Figure 3.1) does not include any discussion of the impact of dredging or barge and ship traffic. The RI Work Plan itself acknowledges that dredging occurred as recently as 1985 (page 5). There is also barge and naval vessel traffic in various reaches of the Anacostia River. While some of these same reaches may be relatively deep, the impacts of sediment reworking from dredging and vessel traffic should be considered. | We agree that dredging constitutes a mechanism whereby contaminated sediments can become re-suspended and transported in the water column. As such, the CSM discussion and figure will be revised to include dredging as a process that can re-suspend contaminated sediments. |
| 334 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.1 | 23 | The title of Section 3.1.1 is "Chemicals of Potential Concern," but the subsequent text proceeds to describe "chemicals of concern" (omitting the word "potential") at the various sites. The definitions of "chemicals of potential concern" and "chemicals of concern" should be provided, and the appropriate term should be used. | We agree that clarification of the terms "constituent of concern" and "potential constituent of concern" is necessary. |
| 335 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.2 | 24 | The Work Plan states that sources of hazardous constituents to the tidal river include "seepage of groundwater from contaminated sites that border the river," and that the "predominant sources for contaminated groundwater are likely the environmental cleanup sites (six of which are currently known) that border the river and have documented groundwater contamination issues (Section 3.1.2.1)." These statements could be read to suggest that contaminated groundwater from CSXT's Benning Yard (one of the six identified sites) is seeping directly into the river. While there may be seepage from that site into Fort Dupont Creek (a tributary of the river), there is no seepage of contaminated groundwater from that site directly into the river. This should be clarified. | The referenced text passage (first sentence, Section 3.1.2) will be revised to read "Sources of hazardous constituents to the tidal river include surface water inflow, seepage of potentially contaminated groundwater from contaminated sites that border the river,..." |
| 336 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.2 | 24 | This section also states the combined average daily discharge of the two branches is 19,000,000 cubic feet (cf). This does not agree with statement on page 9 regarding the hydrology of the Anacostia River from the TAM/WASP model document (Behm et al., 2003), which states the combined average daily discharge of the branches is approximately 370,000,000 L (or 13,066,000 cf). A change of this magnitude would alter the modeled hydrodynamics. | We acknowledge this comment. The average daily discharge quantities indicated in the work plan are consistent with the quantities cited in each document. |

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| 337 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.2 | 25-26 | In describing the constituents of concern (COCs) that the Work Plan indicates are potentially attributable to the CSXT Benning Yard, the chemical fingerprinting investigation by NewFields (2013) should be acknowledged. This investigation showed that there was no evidence that Benning Yard's general operations, or the specific diesel fuel seep into the Culvert Junction Area of Fort Dupont Creek, have contributed to the contaminants, including PAHs, that have accumulated in Fort Dupont Creek or Anacostia River sediments. Instead, urban runoff was identified as the source of TPH-DRO and PAHs through careful comparison to runoff-impacted soils from the I-295 overpass (and sediments proximal to a WASA MS4 outfall). CSXT's work in assessing the impact of diesel fuel from its rail yard on the Anacostia River sediments through a thorough chemical fingerprinting study should be included or at least acknowledged in the Work Plan. In addition, apart from TPH-DRO and select PAHs, the investigation conducted by Geosyntec on behalf of CSXT of the Benning Yard facility did not identify any other COCs at that site, even though a very large parameter list was analyzed for during the investigation (Geosyntec, 2013). The text should be revised to reflect that fact. | Please see response to Comment #327. |
| 338 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.2.2 | 27 | This section notes that surface water discharges from outfalls and tributaries is characterized by high sediment content and rapid velocities. Citations should be provided to clarify the source of this information and to indicate whether sitespecific data have been collected to support these statements. Moreover, this section refers to "low level urban background contamination" coming from outfalls and tributaries. The basis for characterizing this important non-point source as "low level" is not explained, and in fact that characterization seems to contradict results of Foster et al. (2000) and other urban watershed studies which conclude that urban runoff is a dominant source of pollutants to urban waterways. "Low level" is not a justified characterization of this important source of contaminants to the River. | The statement that high sediment content and rapid velocities characterize runoff conditions in the Anacostia watershed is in reference to generally acknowledged conditions in urban watersheds where many stream sections have been replaced with efficient storm drain systems that convey storm water flows unimpeded to a receiving drainage. Such modifications to the watershed will result in elevated flow velocities and increased sediment transport. For additional discussion specific to the Anacostia watershed, please see the following citation, which will be added to the text noted in the comment: (AWTA, 2002). This reference is listed in the reference section of the work plan as "Anacostia Watershed Toxics Alliance and Anacostia Watershed Restoration Commission, 2002. Charting a Course Toward Restoration: A Toxic Chemical Management Strategy for the Anacostia River." |
| 339 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.2.2 | 28 | In the subsection titled Combined Sewer System Outfalls, there is a discussion regarding 82 combined sewer system (CSS) releases per year and a volume of about 2.142 billion gallons. The source of this information is dated from 2002 (AWTA, 2002). This number may be out of date considering population growth and increased regulatory requirements to reduce CSS outfall releases. As part of the preliminary CSM development, more recent and accurate numbers should be provided to characterize the CSS releases to the Anacostia River. CSS outfalls are also a source of pharmaceutical and personal care products (PPCPs) and pathogens. The PPCPs include components of prescription and over-the-counter drugs, cosmetics, and personal hygiene products. A number of PPCPs have been shown to mimic the hormone estrogen and are thus classified as endocrine disrupting chemicals (EDCs) (Vandenberg et al., 2012). Pathogens are disease-producing agents (e.g., viruses, bacteria, and protozoa) that are commonly found in human and animal waste. Both the PPCPs and pathogens are potentially important ecological stressors associated with the CSSs managed by the District's Water and Sewer Authority and should be considered for inclusion as target analytes in this Work Plan. | This comment raises two issues: (1) the cited number of CSS releases per year and estimated volume released should be updated and (2) that pharmaceutical and personal care products (PCPPs) should be added as COCs. Each issue is addressed below. (1) We believe that the cited data regarding CSS releases is current enough for the purposes of this discussion. However, we will update this information with any data that is readily available. (2) We agree that PCPPs are a concern but to keep the COC list manageable, we intend to include only the COCs discussed in Section 3.1.1. It should be noted that the revised work plan will more clearly indicate the project COCs and will indicate that the COCs will include the full list of 209 PCB congeners plus parent PAHs and selected alkylated ranges. As noted by the commenter, there are a large number of PCPPs and they include a range of chemicals. The project team believes that the existing list is sufficiently extensive for the purposes of the RI. No changes will be made to the work plan in response to this comment. |
| 340 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.2.2 | 29 | The results of Foster et al. (2000) are not discussed in the discussion of the Northeast and Northwest Branches. As described above (in the comment on pages 9-10 of the Work Plan), this study's results on PAHs should be highlighted given their impact to the tidal Anacostia sediments. | We acknowledge this comment. We will incorporate a summary of Foster et al. (2000) in Section 3.1.2. |
| 341 | Julia Herron | CSX Transportation | Commercial Entity | Section 3.1.6 | 32-34 | The discussion of watershed modeling presented here fails to discuss the limitations of one-dimensional models, such as the TAM/WASP model, and the associated uncertainty in model results. See comments on Sections 6.3 and 6.4 below. On page 33, the Work Plan states that the daily sediment load in the TAM/WASP model was specified using estimated sediment concentrations and that, depending on the source, these loads were obtained from direct monitoring results, streams with available data, or modeling results. Citations for these statements should be provided. | The purpose of the discussion is to summarize the results of the modeling performed rather than to compare the modeling approach with other potential approaches along with the associated advantages and limitations. With respect to referencing how daily sediment loading rates were developed for the model, a citation to Shultz (2003) will be added which corresponds to the following reference: "Schultz, C.L., 2003. Calibration of the TAM/WASP Sediment Transport Model – Final Report, Interstate Commission on the Potomac River Basin Report No. 03-01, April 2003." |
| 342 | Julia Herron | CSX Transportation | Commercial Entity | Table 3.2 | 1 of 3 | The first page of this table lists many constituents as "site constituents of concern" for the CSXT Benning Yard site. This list appears to constitute all constituents that were analyzed for. Listing all of the contaminants which were tested for in samples from a site as "constituents of concern" is misleading. Testing for a contaminant does not equate to the contaminant being present at concentrations that would make it a constituent of concern. As noted above, Geosyntec (2013) included only TPH-DRO and select PAHs as constituents of concern for the Benning Yard site, even though a very large parameter list was analyzed for during the investigation. | Please see response to Comment #136. |

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|--------|---------------------------|--------------------|-------------------|---------------------------|----------|--|---|
| 343 | Julia Herron | CSX Transportation | Commercial Entity | Table 3.2 | 2, 3 of | This table of COCs lists "PAHs" for CSX sediments, "16 PAH Priority Pollutants" for Pepco and Washington Gas sediments, six individual HPAHs for Kenilworth sediments, and only benzo(a)pyrene for Washington Navy Yard sediments. In using these different PAH-based COCs, there is an implication that these sites have different PAH COCs. For example, as the table currently reads, non-priority Pollutant PAHs (e.g., alkylated PAHs) are not COCs at the Washington Gas site and only BaP is a COC at the Navy Yard. Is this the intention, and if so, what is the justification for distinguishing "PAHs" versus "16 PAH Priority Pollutants" versus individual HPAHs as COCs for the different PRP sites? If this is not the intention, Table 3.2 should be homogenized appropriately to refer the specific PAHs that are COCs at all sites. Given that outfalls and tributary streams were discussed in Section 3.1.2.2, Table 3.2 should list the Northeast and Northwest Branches, the 15 CSS outfalls, and the 60 MS4 outfalls, as potentially responsible parties (PRPs). The CSSs are acknowledged to "have been sources of contamination to the river for decades" (p. 59). Clearly, urban runoff is an important source of pollutants to the River, yet the District's Water and Sewer Authority is not a listed PRP. | This comment raises two issues: (1) the reference to PAHs in Table 3.2 is inconsistent and (2) Table 3.2 should be revised to include the 15 CSS outfalls and 60 MS4 outfalls. Responses are provided below: (1) We agree with the comment that the reference to PAHs should be homogenized. For any of the RP sites that indicate PAHs as a potential constituent, the generic entry "PAH" will be used in the table. A footnote will be added stating that "Since available documentation for this site suggests that one or more PAHs are evaluated through sampling, PAHs are noted. PAH generically refers to the full range of Priority Pollutant PAHs. (2) The RP sites specifically sited in the document represent potential point sources of contaminants whereas the 75 outfalls referenced in the comment are non-point sources. Given the fundamental differences between these two source types, Table 3.2 appropriately includes only point sources. |
| 344 | Julia Herron | CSX Transportation | Commercial Entity | Section 4.1.2, Table 4. | 41 | In Step 7 of Table 4.1 states: "Sampling will be dynamic and tailored to the conditions observed in the field." This statement is a very vague and does not address the needs of the data quality objectives and developing a sampling plan. The same paragraph describes using bathymetry data to inform some of the sampling and states that the locations may be revised based on this bathymetry data. The bathymetry data have been collected already (see Tetra Tech, 2013). The sampling plan should be revised and sent out for further review. The next paragraph in the same section (Step 7) is even vaguer: "Various types of sampling equipment will be used" This is an insufficient level of detail for assessing whether the sampling plan is sufficient to address the data quality objectives and whether the data will support refining the CSM. In the last bullet for Step 7, no indication is given regarding the protocol for choosing the portion of geotechnical samples (20%) which will undergo increased analyses (bulk density, moisture content, Atterberg limits). | This comment raises the following issues: (1) the discussion of sampling methods in Step 7 of Table 4.1 is too vague, (2) the sampling locations revised based on the bathymetric survey results should be subject to further review. Responses follow: (1) Final sampling locations for the subset of samples that will be subjected to geotechnical analyses will be pre-determined prior to the start of the field effort and will be specified in the Field Sampling Plan. Locations will be selected to provide reasonable spatial coverage of the identified sediment geomorphic units. In addition, sampling equipment will be further described in the Field Sampling Plan. (2) As noted by the commenter, the bathymetric survey was completed after the work plan was drafted. Sampling locations were revised based on a geomorphic analysis of the bathymetric data. The revised work plan will present the revised locations. |
| 345 | Julia Herron | CSX Transportation | Commercial Entity | Sectoin 4.2.1 | 43 | The Work Plan notes that it uses the term "elevated" to characterize concentrations that exceed the EPA Region 3 BTAG freshwater sediment screening benchmarks shown in Table 2.5. As the Work Plan also correctly recognizes, those benchmarks are "very conservative" and "may be below effects-based levels if other less conservative benchmarks were used." Despite this caution, however, a reader may erroneously interpret the term "elevated" as indicating levels of concern. In fact, those benchmarks are so low that their exceedance should not be regarded as indicating levels of concern for effects on human or ecological receptors. Thus, to avoid misunderstanding, the Work Plan should use a different term such as "concentrations above BTAG benchmarks," or should use different or | The WP will be revised to clarify the meaning of "elevated" with respect to identified benchmarks. The risk assessments will further define the significance of detected chemical concentrations with respect to various assessment endpoints. |
| 346 | Julia Herron | CSX Transportation | Commercial Entity | Sectoin 4.2.1 | 44 | In the discussion of LPAHs and HPAHs, it is not stated which and how many PAHs are included in these totals, which are plotted in Figures 4.2 and 4.3, respectively. Do these totals include only Priority Pollutant LPAHs and HPAHs, respectively, or do they include all available LPAHs and HPAHs (e.g., including alkylated LPAHs and HPAHs)? It must be clear that the River-wide maps shown in Figures 4.2 and 4.3 are accurately comparing LPAH and HPAH totals that include the same number of specific analytes in these totals from the different studies (i.e., the LPAH total when 51 PAHs are measured is going to be higher than the LPAH total when only 16 PAHs are measured). What is actually plotted in Figures 4.2 and 4.3 should be explained (or corrected). | Please see response to Comment #343. In general, in the absence of specific details regarding the specific numbers of PAH compounds reported for each sample point, the LPAH and HPAH concentrations reported on Figures 4.2 and 4.3 were calculated by summing the concentrations of the respective parent LPAHs (6) for the LPAH total and parent HPAHs (10) for the HPAH total. Based on the evaluations noted in the response to Comment #343, this will be the default approach for LPAH and HPAH summarization on Figures 4.2 and 4.3. A clarification noting this will be |
| 347 | Julia Herron | CSX Transportation | Commercial Entity | Sectoin 4.2.1 | 45-46 | The Work Plan's discussion of metals data from River notes the presence of elevated concentrations of several metals (e.g., arsenic, cadmium, chromium, mercury) in the vicinity of the Fort Dupont Creek outfall. This may be read to suggest that Benning Yard is the source of these elevated concentrations. However, that fails to recognize that surveys previously conducted on the Fort Dupont Creek watershed have indicated the presence of elevated levels of contaminants throughout that watershed, including upstream of Benning Yard. The presence of iron-oxidizing bacteria, along with their associated oily films and flocculates, has been documented throughout the entire Fort Dupont stream system (Robbins and Norden 1994). Elevated concentrations of iron have been recorded within this system of tributaries, and Fort Dupont Creek has been documented as being iron-rich, with levels unsuitable for certain macroinvertebrates and fish (USEPA 1986). In addition to iron, other metals have been listed by the USEPA as causing impairment for Fort Dupont Creek. These include arsenic, copper, lead, and zinc (USEPA 2002). | We acknowledge this comment. |

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| 348 | Julia Herron | CSX Transportation | Commercial Entity | Section 4.2.2 | 48-50 | As stated previously (in the comment on pages 25-26 of the Work Plan), CSX's work in assessing the impact of diesel fuel from the Benning Yard on the Anacostia River sediments through a thorough chemical fingerprinting study (NewFields, 2013) should be included or at least acknowledged in the Work Plan. The specific mention of elevated LPAH and HPAH concentrations in the mid-channel sample located 1000 feet upstream of Fort Dupont Creek should acknowledge that fingerprinting that showed these PAH were derived from a heavy fuel oil – and not from diesel fuel (NewFields, 2013). The source of this heavy fuel oil is unknown, but it is not attributable to CSXT Benning Yard operations. In addition, this section states on page 50 that "each of [the listed] metals were detected in essentially all of the samples." This discussion should be modified to include the fact that metals were detected at the reference sites as well. | Please see the response to Comment #327. |
| 349 | Julia Herron | CSX Transportation | Commercial Entity | Section 4.2.5.2 | 53 | The Work Plan states that total PAHs are among the constituents "considered to pose the greatest risk" for human fish consumption. This statement seems questionable since PAHs do not significantly bioaccumulate in the food chain. Additionally, it seems premature to make risk assessment conclusions prior to performing the risk assessment and considering that the sediments are known to be impacted by a number of chemicals includ | The text referred to in the comment refers to a study conducted by U.S. Fish and Wildlife in which chemicals in fish tissues from the Anacostia River were compared with U.S. EPA human health screening values (Pinkney et al. 2009). The median concentration of PAHs did exceed the U.S. EPA screening value, and PAHs were identified as potential contaminants of concern. The text will be revised to clarify these results. |
| 350 | Julia Herron | CSX Transportation | Commercial Entity | Sections 4.2.6 and 4.2.7 | 55 | The Work Plan states that the existing bathymetric data for the River are limited to the area around the Navy Yard and are otherwise inadequate. This section of the Work Plan needs to be updated. DDOE has recently completed a detailed bathymetric survey (Tetra Tech, 2013). | The referenced text will be updated to indicate that the bathymetric survey has been completed. |
| 351 | Julia Herron | CSX Transportation | Commercial Entity | Section 4.2.7 | 55 | This section list data gaps in three general areas, but no data gap is specified for surface water sampling. However, Section 4.2.3 ("Pore Water and Surface Water") states: "Pore water data and surface water data are not available in the project database" (p. 50). If there are no or limited surface water quality data, then this is a critical data gap that needs to be filled. Without surface water quality data, one cannot assess the performance of a water quality model through calibration and validation. In addition, there would be insufficient information to support any bioaccumulation model that may be developed. | The WP will be revised to clarify that the lack of chemical concentration data in surface water and pore water is considered a data gap. |
| 352 | Julia Herron | CSX Transportation | Commercial Entity | Section 4.3.1 | 58 | The Work Plan states: "As noted in the CSM discussion in Section 3, the most significant ongoing sources of sediment contamination to the tidal Anacostia River are the environmental sites, CSS outfalls, SSOs, and tributaries which collectively deliver suspended sediments laden with PCBs, PAHs, pesticides, metals, and pathogenic bacteria." This statement implies that the CSXT Benning Yard site is a significant ongoing source of sediment contamination to the Anacostia. As discussed above, the analyses presented in the EnviroScience (2013) and NewFields (2013) reports have demonstrated clearly that this is not the case. The Work Plan should be revised to reflect that conclusion or, at a minimum, to reference these reports and their conclusions. | Please see the response to Comment #327. In addition, the referenced text will be revised as follows: "As noted in the CSM discussion in Section 3, the most significant potential ongoing sources...." |
| 353 | Julia Herron | CSX Transportation | Commercial Entity | Section 4.3.2 | 59 | Given the significant impact that the Northeast and Northwest Branches have on contaminated sediments in the tidal Anacostia River (e.g., Foster et al., 2000) any lack of institutional controls on these sources will undermine any cleanup of the River. This should be discussed in Section 4.3.2. | We acknowledge the comment. The concern expressed in this comment will be considered in the RI report and in the FS. No changes will be made to the work plan in response to this comment. |
| 354 | Julia Herron | CSX Transportation | Commercial Entity | Section 4.3.3 | 59 | The Work Plan states: "Data gaps regarding the potentially significant sources of groundwater contamination will be addressed through the investigation and remediation of the six environmental sites." As discussed above (in the first comment on Section 3.1.2), to avoid misunderstanding, the Work Plan should clarify that contaminated Benning Yard groundwater is not seeping directly into the Anacostia | The referenced text notes that the groundwater may potentially be contaminated. Therefore, no changes will be made to the work plan in response to this comment. |
| 355 | Julia Herron | CSX Transportation | Commercial Entity | Section 5.1 | 62 | The planned RI tasks, including the proposed sediment characterization, make no mention of the collection of data for chemical fingerprinting of hydrocarbons and PCBs to assist in the evaluation of sources. Such fingerprinting, such as described by Douglas et al. (2007) and used in the NewFields (2013) study, can be extremely valuable in assessing the nature and potentially the source(s) of contamination. Thus, consideration should be given to collecting data for, and conducting, chemical fingerprinting as part of the RI | We acknowledge this comment. |
| 356 | Julia Herron | CSX Transportation | Commercial Entity | Section 5.1.1 | 62 | The section should be updated to note that the bathymetric survey has been completed (Tetra Tech, 2013). | Section 5.1 will be revised to note that the bathymetric survey has been completed. |
| 357 | Julia Herron | CSX Transportation | Commercial Entity | Section 5.1.2 | 64 | Although slides provided and shown by DDOE/Tetra Tech at the February 18, 2014 meeting at DDOE indicated that all 383 sediment samples will be analyzed for "alkylated PAHs," the Work Plan does not mention alkylated PAHs, only "Priority Pollutant List." Further, as discussed above, chemical fingerprinting can be a very useful tool in assessing the nature and source(s) of contamination, and consideration should be given to adding it to the RI. | As noted in the response to Comment #339, the revised work plan will more clearly indicate the project COCs and will indicate that the COCs will include the full list of 209 PCB congeners plus parent PAHs and selected alkylated ranges. In addition, the revised work plan will more clearly indicate the analyte lists that apply to each medium. The full list of 209 PCB congeners and the alkylated PAHs will be analyzed in all surface sediment samples and a portion of the subsurface samples. We will determine the appropriate data evaluation approaches during the data evaluation phase in support of the RI report. |

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| 358 | Julia Herron | CSX Transportation | Commercial Entity | Section 5.1.4 | 65 | The Work Plan states that benthic invertebrate sampling will be conducted only if these organisms are present "in sufficient numbers," and that if insufficient benthic invertebrates are present at any sampling location, sampling for toxicity testing will be conducted. The Work Plan fails to specify which protocols or criteria will be followed to determine if "sufficient" invertebrates are present at a given sampling location, and also what method will be used to sample the invertebrates. In previous studies conducted by EnviroScience on behalf of CSXT and submitted to DDOE in 2008, the sediment in the Anacostia River was shown to be depauperate of benthic organisms (EnviroScience 2008a, 2008b). These findings were in agreement with similar surveys conducted by USFV in reaches throughout the Anacostia River (McGee and Pinkney, 2002). Moreover, the organisms present in the surveys were characteristic of degraded water quality. It is unlikely that additional sampling will yield populations of benthic invertebrates that are radically different than those previously collected. The sampling design in the Work Plan should be modified to anticipate the likelihood of collecting low numbers of benthic invertebrates, with the understanding that these samples, even with "insufficient" diversity and abundance, will reflect the true biological | Please see response to comment #11 for a discussion of the opportunistic approach to sampling benthic invertebrates. The statement that the depauperate benthic community represents the "true biological condition" of the sediments in the Anacostia River begs the question of whether chemical contaminants have adversely affected the native benthic community to cause the depauperate condition observed. The RI is designed to address that question. |
| 359 | Julia Herron | CSX Transportation | Commercial Entity | Section 5.1.4 | 65 | The Work Plan states that sediment toxicity testing will be conducted using the amphipod (<i>Hyalalella azteca</i>) and/or midge (<i>Chironomus dilutus</i>) to assess survival and growth. In a recent study using the sediment triad approach to evaluate baseline conditions in the Anacostia River (McGee et al., 2009), sediment toxicity was assessed at 20 stations from Bladensburg, MD to Washington, DC using those species. Only one station (near the O-Street combined sewer outfall) in the study exhibited toxicity related to sediment contamination. This toxicity was attributed to organic contaminants in the lower reaches of the river. Some stations with coarser grain size had deleterious effects on midge growth, which was attributed to the fact that the midges were unable to tunnel into the coarser substrate. In other studies, <i>Chironomus</i> responded more to the sediment nutritional levels than to associated contaminants, suggesting that in human-dominated systems, they would not be an appropriate surrogate for benthic species protection (De Hass et al., 2002). The fact that <i>Chironomus</i> is one of the few organisms that has been shown to proliferate in Anacostia sediments might make it less than ideal as a test specimen to evaluate toxicity of these sediments. A valid interpretation of the results might also be difficult to achieve. Thus, other benthic macroinvertebrates might be considered to provide a more robust characterization of the existing benthic community in the river. Unlike midges, which receive most of their body burden of contaminants directly from sediment ingestion, benthic invertebrates may also accumulate chemicals by direct adsorption through the body wall (NOAA, 2003). In any event, if midges are used, the investigators might consider calculating the incidence of mouthpart deformities in midges using guidance from Lenat (1993) and Groenendijk et al. (1998). Such deformities in midges occur during larval development and are sublethal responses to heavy metals, organochloropesticides, and other organic compounds (Janssens de Bisthoven et al., 1992). These deformities provide an excellent tool for measuring population response to contaminated sediments, and have been successfully used previously to evaluate sediments in the Anacostia River (Mendel and Krejca, | We have selected the 42-day <i>Hyalalella azteca</i> toxicity and reproduction test and the 10-day <i>Chironomus dilutus</i> toxicity test based on a currently accepted practices in freshwater sediment risk assessment. We understand that the chironomid developmental test focusing on mouthpart deformities was used by CSX to evaluate sediment toxicity. However, the reports from the CSX investigation were considered technically inadequate by the natural resource trustees and were rejected by DDOE's Water Quality Division. |
| 360 | Julia Herron | CSX Transportation | Commercial Entity | Section 5.1.5 | 66-67 | This Work Plan states that, during collection of surface sediment samples, the availability of invertebrate tissue will be qualitatively evaluated and a decision made whether adequate volume of invertebrate tissue can be obtained. The abundance of organisms in the sediments of the Anacostia is generally very low, although at times certain organisms can exhibit a high abundance (McGee et al., 2009). In a situation where few organisms are retrieved, the amount or type of analyses would be limited by available tissue volume. The Work Plan should specify the tissue analyses planned and the minimum tissue volume needed to conduct each of those analyses. Method-appropriate preservation for tissue analysis would be refrigeration or freezing in some cases. Essentially, this would mean that organisms would need to be quickly sorted from debris in the field without preserving them, and placed in a container for analysis. If sufficient organisms were determined to be present (i.e., several thousand oligochaetes), these would need to be carefully separated from the organic matter and sediment in the dredge sample. It may not be feasible to repeatedly collect and sort such a large volume of tiny organisms while complying with holding times and adhering to proper preservation methods. In addition, the digestive tracts of sediment-dwelling chironomids and oligochaetes are usually completely filled with sediment material at the time of collection, which could add to the measured body burden of contaminants and misrepresent the transfer of contaminants to the actual organism. USEPA (1993) guidance recommends that, as organisms are removed from the sediment, all adhering particles be removed, and that these organisms be placed in clean control sediment to purge their gut contents 24 hours before chemical analysis. If macroinvertebrate samples are to be processed for bioaccumulation purposes, how will the Work Plan be modified to account for these discrepancies? | We understand the logistical issues raised by the reviewer. As stated in the Work Plan, benthic invertebrates will be collected opportunistically. If the type or number of invertebrates available in the field cannot practically support the desired analyses, then the analyses will not be conducted. Where available, larger invertebrates such as clams may be collected instead of oligochaetes. The tissue samples are not intended for use in a formal bioaccumulation model but for inclusion in a field-based food chain model. Depuration of organisms is not required for use of tissues in a food chain model. The sediment in the invertebrate's gut is part of what the predator would ingest under a typical foraging scenario. Organisms collected for this purpose will not be depurated. Crayfish collected for the HHRA will have the intestine removed prior to tissue analysis. |
| 361 | Julia Herron | CSX Transportation | Commercial Entity | Section 5.1 | | In Figure 5.1, the sample location for T-16-B is shown along the eastern shore near Fort Dupont Creek outfall, yet Table 5.2 lists the T-16-B location as being near the "west shore adjacent to East Capitol Street Bridge." These are inconsistent with one another. In any event, it is unclear why it is necessary to sample at all near FDC given the existing CSXT dataset (EnviroScience, 2013). | The location on Figure 5.1 is correct. The location description in Table 5-2 will be revised. |
| 362 | Julia Herron | CSX Transportation | Commercial Entity | Section 6.3 | 70 | This section indicates that the RI Summary Report will include an update of the TAMWASP model and evaluation of the fate and transport model results. This suggests that the decision has already been made to use the TAMWASP model for this RI when a re-evaluation of its appropriateness to meet the RI objectives (and broader CERLA/NRDA objectives) needs to be undertaken first. The one-dimensional TAMWASP model is not an appropriate tool for the determining the nature and extent of contamination in tidally influenced system like the Anacostia River (see next comment). This section also does not state whether the hydrodynamic, sediment transport, and contaminant fate and transport models will be calibrated and validated using the new data after the model updates have been made. Since the model is proposed to be modified and new data are being used as input to the model, then the model calibration and validation should be revisited, and results presented in the RI Summary Report. | The referenced text indicates that the RI report will discuss the result of the TAMWASP model update. The text will be revised to indicate that discussion will be provided regarding updated hydrodynamic and fate and transport modeling of the tidal river (removing reference to the existing TAMWASP model. In Section 6.4, the model update is clearly defined as including consideration of "other modeling approaches" which would include potentially selecting a new modeling code and expanding the model to 3D. In addition, Section 6.4 states that model calibration will be performed. |

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| 363 | Julia Herron | CSX Transportation | Commercial Entity | Section 6.4 | 71 | The Work Plan notes that the RI data will be used to support an update and revision of the TAM/WASP model. However, use of that model is not appropriate to address the stated objectives of the RI – to “[d]etermine the nature and extent of contaminated environmental media (surface water, sediment, ...). [c]onduct sampling required to support an NRDA ... [and] support the completion of the feasibility study” (p. 1). While the TAM/WASP model may have been appropriate for previous studies such as development of TMDLs, it is not appropriate for the current CERCLA/NRDA process. The TAM/WASP model is one-dimensional model, which means the sediment transport and water quality conditions in the river are averaged over the entire width and depth of the river and are only discretized over the length of the river. As a result, the model projects that any source of contamination included in the model, once it enters the river, will be spread across the river and over depth instantly and then be transported by the tides. This grossly mischaracterizes the physical processes that would be occurring in the tidally driven river and would result in more spreading of contamination than is appropriate. The Schultz (2003) report on the TAM/WASP model calibration does not include a calibration of the hydrodynamics. The report indicates that model inputs are daily flows and daily tidal cycles to drive the downstream boundary condition. While daily inflows may be acceptable, a daily tidal value does not capture the tidal cycle influencing the hydrodynamics and therefore sediment transport. The TAM/WASP model does not include any feedback between the sediment transport and the hydrodynamics, so that, as the bed elevation changes due to deposition or erosion, there is no feedback into its influence on the hydrodynamics. Additionally, the sediment transport model within TAM/WASP was calibrated (Schultz, 2003) with only limited total suspended solids (TSS) and particle size distribution data, and model/data comparisons were made only using TSS. It is standard practice to use data such as repeated bathymetric surveys and geochronology to calibrate erosion and deposition rates in addition to calibrating for water column parameters such as TSS. The absence of demonstrated agreement between data and model predictions for the sediment bed (erosion, deposition) is a significant shortcoming. With respect to water quality, Mandel and Schultz (2000) identified some key weaknesses of the TAM/WASP model: Dissolved oxygen (DO) levels are overpredicted in the winter months, changes in DO as a result of events are not consistently predicted well, the model does not show the expected DO response to changes in BOD loads from CSO loads, and the model underpredicts average BOD concentration in the Anacostia River. That report gives very limited discussion of model/data error statistics. As a result, the model has not been shown to accurately represent the key processes governing water quality in the study area. In summary, the TAM/WASP model has significant limitations and a full re-evaluation of its ability to facilitate meeting RI objectives is necessary. | We appreciate the insights offered by the commenter and will take them into consideration when proceeding with the model update task. |
| 364 | Julia Herron | CSX Transportation | Commercial Entity | Section 7 | 73 | The Work Plan states that the Ecological Risk Assessment (ERA) will not address the six specific environmental sites identified along the River “because other entities are responsible for characterization and assessment at those sites.” One of those sites is CSXT’s Benning Yard. However, as discussed above and shown in CSXT’s submissions to DDOE, the comprehensive investigations and analyses that CSXT has conducted under DDOE-approved work plans provide no evidence that Benning Yard or specific releases from that site (if any) have contributed to the contaminants that have accumulated in the Anacostia River sediments. See the EnviroScience (2013), NewFields (2013), and CSXT’s response to DDOE comments on those reports (CSX 2013). As a result, CSXT does not believe that it is responsible to perform any risk assessments related to the Anacostia River sediments, including in the vicinity of the Benning Yard, and it has no plans to do so. | The referenced text will be revised to state “Areas with the six environmental sites are excluded from the ERA because other entities are responsible for characterization and assessment at those sites, as appropriate.” As noted in Section 2.6.1, the data from the CSX investigation (documented in CSX [2013]) has already been incorporated into the project database and is already contributing to the RI characterization of the portion of the Anacostia River adjacent to the CSX site. Since the RI sampling has yet to be conducted and the resulting data that will be generated has yet to be evaluated to support the preparation of the RI report, it is premature to speculate where a risk assessment is needed or who will conduct it if one is deemed necessary. |
| 365 | Julia Herron | CSX Transportation | Commercial Entity | Section 7.1.2.3 | 75 | The Work Plan proposes to use the EPA Region 3 BTAG freshwater sediment screening benchmarks as the basis for comparison in the Screening-Level Ecological Risk Assessment (SLERA). As discussed above, those benchmarks are extremely conservative and likely below any ecological effects levels. In fact, they are so low that it appears likely that virtually no sediments in the Anacostia River will “pass” this test and thus be screened out. This would make the SLERA little more than a pro forma box-checking exercise. If the goal is to make the SLERA more of a useful screening step to narrow the scope of the Baseline Ecological Risk Assessment (BERA), more supportable screening benchmarks should be used for sediments. | Screening benchmarks are developed based on toxicity and adverse effects on receptors. They are not adjusted to reflect ambient conditions in a given water body. Failure of sediments to pass the screening criteria is not a reflection on the criteria but on the condition of the sediments in the river. The SLERA represents steps 1 and 2 of the 8-step U.S. EPA ecological risk assessment process (see response to comment 96 above). It is necessarily conservative in that chemicals that potentially pose risk are retained for further evaluation. During Step 3a, chemicals of potential concern are compared with background (for inorganic constituents) or ambient (for organic constituents) to evaluate the site-specific incremental contribution of an area to overall risk. A separate discussion of appropriate background/ambient concentrations for the tidal Anacostia River is ongoing. |
| 366 | Julia Herron | CSX Transportation | Commercial Entity | Section 7.2 | 79-82 | The Work Plan states earlier on pages 74-75 that the assessment endpoints for the SLERA will include adequate protection of aquatic communities in the River and of aquatic-dependent avian and mammalian populations along the shoreline, and that (apart from threatened and endangered species) the focus of the SLERA will be on ensuring the sustainability of the local populations, not individual organisms. This focus on local populations and communities, rather than individuals, is correct and consistent with USEPA guidance (USEPA, 1999). Thus, those points should also be included in the discussion of the BERA in Section 7.2, and specifically the discussion of assessment endpoints on page 79. In addition, the suggestion on page 80 that the EPA Region 3 freshwater sediment screening benchmark might still be used in the BERA should be deleted. Even if used in the SLERA, those benchmarks are far too conservative for use in the BERA. Finally, consistent with the focus on local populations and communities, the discussion of the BERA should recognize the possibility of conducting population field surveys for selected receptors if warranted. This should be inserted as an additional subsection 7.2.2.5. | The discussion of the BERA is in accordance with standard practice, following U.S. EPA (1997) and subsequent guidance. The 8-step process is intentionally iterative so that information gathered during one step can be incorporated into the ERA framework. The assessment endpoints proposed in the WP are suitable for the tidal Anacostia River and consistent with the U.S. EPA guidance. Both measurement and assessment endpoints used in the SLERA are generally modified in the BERA based on literature reviews or field observations. Biological surveys are not planned during this phase of the RI, as existing data on ecological receptors is considered adequate at this time. |
| 367 | Julia Herron | CSX Transportation | Commercial Entity | Section 8.2.2 | 86 | This section lists “subsistence receptors” as a category of receptors to be evaluated in the Human Health Risk Assessment (HHRA). It describes that group as “persons (adult, youth, and child) who rely on fish from the Anacostia River for the majority of their protein”; and it cites a 2013 report from the Anacostia Watershed Society as a justification for the inclusion of this receptor group. This Work Plan should provide the proposed fish consumption rates that will be used to evaluate this receptor group so that the appropriateness of these rates can be evaluated. | Ingestion rates for subsistence fishers will be developed in accordance with U.S. EPA guidance on human health risk assessment and review of all available pertinent literature. The correct reference to the angling study is Opinion Works (2012), as noted in comment #56. |
| 368 | Julia Herron | CSX Transportation | Commercial Entity | Section 8.2.3 | 88 | The Work Plan notes that the exposure parameters to be used in the HHRA for the receptor groups listed in Section 8.2.2 will be “based on standard default values or recommendations (not available for all receptors) as modified based on sitespecific conditions.” However, the Work Plan does not provide the exposure parameters that will be used, nor does it indicate that a separate HHRA work plan with these details will be prepared. USEPA does not have standard default exposure factors for the types of recreational receptors identified Section 8.2.2, and as mentioned above, it is unspecified what fish consumption rate will be used for subsistence anglers. Thus, the Work Plan should provide the exposure parameters to be used, including the site-specific modifications, or else indicate that those parameters will be presented for review in a later work plan. | It is premature to identify specific ingestion rates and exposure pathways for the HHRA. Section 8.0 of the WP provides information on the approach to conducting the HHRA, including assumptions about exposure factors. For example, it is anticipated that ingestion of contaminated fish and direct contact with contaminated surface water and sediment may be important exposure pathways. Anticipated receptors include recreational users, subsistence fishers, and construction/utility workers. Details of the conceptual site model for the HHRA will be influenced by the analytical results of the investigation that define the nature and extent of |

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| 369 | Julia Herron | CSX Transportation | Commercial Entity | Section 9 | 93-94 | The discussion of the natural resource damage assessment (NRDA) process does not mention certain important steps in the process. One is the determination of the baseline condition of the resources and their associated services – i.e., the condition of the resources and their services in the absence of the contaminant releases, which must take into account any natural or anthropogenic impacts apart from the releases. This is critical since responsible parties are liable only for the damages caused by their releases, not other changes in the resources. Another key step is the quantification of the loss of or reduction in services from baseline due to the resource injuries. This is a critical link between the determination of injury to the resources and the determination of damages, because natural resource damages must be based on a loss of or reduction in services provided by the resources, not simply the injuries. These steps are recognized in the U.S. Department of the Interior's and NOAA's NRDA regulations. See 43 CFR §§ 11.71, 11.72; 15 CFR § 990.52. Thus, a discussion of those steps should be added. | Please see response to Comment #297. |
| 370 | Brooke DeRenzis | DC Appleseed | Environmental Group | Section 5.1.2 | 63-64 | Poly chlorinated Biphenyls (PCBs). The current draft RI work plan should be strengthened in three ways with respect to PCB sampling and analysis: First, we believe there should be a more uniform and extensive sediment sampling and analytical regime chosen for PCBs. The current sediment sampling plan for PCBs (pp. 63-64) has the sampling horizon in the deep sediment samples selected on the basis of field screening. As PCBs are a concern in sediments even in concentrations as low as one part per million (ppm), field screening will be of little help in selecting such sediments for analytical work. PCBs have no distinctive odor and at those low concentrations would not be evident even if they had a distinctive color. We recommend instead that a more uniform sediment sampling regime be chosen for PCBs, since a comprehensive picture of their stratification will likely be needed in order to determine whether capping, dredging, or monitored natural attenuation is the wisest course in a particular river location. | Please see responses to Comment #357 and Comment #302. |
| 371 | Brooke DeRenzis | DC Appleseed | Environmental Group | Section 5.1.2 | 63-64 | Second, we believe that all sediment samples should be analyzed for all aroclors. The current sampling plan also indicates that 20 percent of the sediment samples are to be analyzed for PCB congeners, sometimes referred to as monomers or aroclors. (p. 64). There are over 200 different PCB congeners, about a dozen of which were widely used, some of them in very distinctive applications, such as carbonless paper. Because analysis of these aroclors may allow DDOE to narrow the scope of the liability inquiry somewhat, as would be the case if aroclor 1248 from carbonless paper were found in quantity, we recommend that all the sediment samples be checked for all the aroclors. DC Appleseed recognizes that this approach will be more costly, but it may allow a much more effective allocation of financial responsibility later. PCB distribution will likely have a major effect on remedial costs. | As noted in Comment #357, the revised work plan will more clearly indicate the analyses planned for each medium sampled. The full list of EPA Priority Pollutants, which includes seven Aroclors, will be analyzed in all surface sediment samples that will be collected. In addition, all surface sediment samples will be analyzed for the complete list of 209 PCB congeners. A subset of the deep sediment samples will be analyzed for 209 PCB congeners. Since Aroclor data is needed to support ecological and human health risk assessment, these data are most critical for surface sediment for the current phase of the project. Therefore, Aroclor analyses are planned for surface sediment and surface water samples. |
| 372 | Brooke DeRenzis | DC Appleseed | Environmental Group | Section 5.1.2 | 63-64 | Third, we recommend that such sediment samples be archived and carefully preserved, in case further analysis is warranted. Unlike volatile organic compounds (VOCs) which are frequent concerns at groundwater cleanups, and where refrigeration, careful observation of holding times, and related precautions must be taken to assure accuracy, the stability of PCBs and other contaminants of concern in the Anacostia sediments (e.g. cadmium, lead) are such that later analytical work would continue to be representative if further information is later needed to refine remedial alternatives or to allocate liability among PCB or metals contributors. | Please see response to Comment #303. |
| 373 | Brooke DeRenzis | DC Appleseed | Environmental Group | Table 5.1 | 95 | Outfall Sampling. The schedule of locations for sampling shows that a number of sample points are located in combined sewer outfall locations. We believe that checking such sediment will be very important in determining relative contributions of such outfalls to the hazardous substance load to the Anacostia sediment. Such sampling may also be critical in locating unknown sources of such contaminants, particularly if there is a distinctive chemical signature suggesting that a discharger to the combined sewer has had a large | We acknowledge this comment. |
| 374 | Brooke DeRenzis | DC Appleseed | Environmental Group | Section 8 | 95 | Re-entrainment of contaminated sediments. We understand that exposure assessments will address the hazards posed by the re-entrainment of hazardous substances in the sediment. Storms, dredging, and the activity of bottom dwelling and burrowing aquatic creatures can cause such re-entrainment. For example, Hurricane Agnes in 1972 moved thousands of tons of sediment, as did later floods and hurricanes. The contaminated sediments were often deposited onshore or in shallower, more exposed bottom locations where people will be exposed. We ask that DDOE confirm that the exposure assessments planned as part of the RI will take such re-entrainment into account, including hazards to the workers conducting flood clean-ups. Currently, the human health risk assessment on page 87 appears to omit this concern for flood cleanup. This issue is also significant in evaluating the re-use or disposal of dredge spoil, and the attendant cost | Please see responses to Comment #1 and Comment #108. |
| 375 | Brooke DeRenzis | DC Appleseed | Environmental Group | General | 95 | Chlordane. The contaminants of concern in the Anacostia sediments include now-banned pesticides, including chlordane, which was phased out more than 25 years ago. Chlordane, which was used to combat termites, is reportedly a significant concern in the Anacostia's upper reaches. ²⁸ The source is reportedly unknown. We recommend that a focused effort be made to determine if there is any distinct "fingerprint" to this chlordane, either a decomposition pattern or a pattern of associated contaminants (such as the "inert" ingredients used in the pesticide), patterns which might allow the manufacturer or formulator of the chlordane in the sediment to be determined. While CERCLA contains an exemption for the normal application of pesticide, ²⁹ the concentrations found in these locations appear to be more concentrated than ordinary use would cause. They are a significant potential ecological concern and may require significant remedial effort, making such a focus appropriate. | The suggested investigation of the original manufacturer of chlordane is beyond the scope of the RI. It is premature to investigate a source before the risk assessment has been completed. |
| 376 | Brooke DeRenzis | DC Appleseed | Environmental Group | General | 95 | Historical sources of contamination. The primary focus of the RI is the field work, as is appropriate. DC Appleseed does recommend, however, that DDOE begin the effort to gather historic information about industrial activity in the watershed in several ways involving archival research, historical inquiries, and a review of historic aerial photographs. The initiation of such work now will accelerate the later allocation of responsibility of all the parties, particularly federal agencies whose activities dominated the shoreline of the Anacostia over most of the last century. For example, a review of historic accounts from newspapers like the Washington Post provides significant information about the Firth Sterling steel plant across the Anacostia River from the Navy Yard, including photographs showing piles of materials exposed to stormwater. This Navy contractor, which manufactured armor piercing shells, may be a source of historic contamination from metals used in steel alloys and paints. It may also be a source of PAHs from possible coking operations. Similarly, aerial photographs of the Navy's operations at Poplar Point, a base at which over 5,000 personnel reportedly worked during and after World War II, might well help locate disposal pits and other operations that may be a source of contamination. Likewise, oil recycling operations are a classic source of PCB contamination; in the 1940s and 1950s such recycling work was often evident from the air, either as waste oil lagoons or as above ground tanks. DC Appleseed also recommends that DDOE put appropriate potentially responsible parties on notice of potential cleanup claims, with the request that such parties preserve all pertinent documents. | We acknowledge this comment and will conduct a web-based search for information regarding Firth Sterling Steel and other potential responsible parties that conducted historical operations on land adjacent to the Anacostia River. |
| 377 | Brooke DeRenzis | DC Appleseed | Environmental Group | Table 10.1 | 95 | Table 10.1 (p. 95) shows that DDOE plans to issue technical draft plans for public comment. These include the draft RI work plan and draft community involvement work plan already released, as well as draft site plans. While these drafts do not require public comment under Superfund, we appreciate DDOE's willingness to seek feedback. However, we are concerned by the amount of time it has taken to release these drafts to the public. For example, DDOE missed the first six deadlines associated with these plans, which are contained in the work plan schedule on page 95, due to delays in issuance of the draft work plan for public review and comment. We urge the executive branch to expedite future review of such documents – particularly those of a scientific or technical nature for which DDOE is the executive's expert agency. Policy decisions are typically made during the choosing of a remedy in the ROD, but not in preceding technical documents like the RI and FS. | DDOE plans to release certain documents for public review moving forward given the strong public interest. However, DDOE does not plan to release for public comment documents of scientific or technical nature, such as the draft site plans (FSP/QUAPP/HASP), which will reduce delay in this project. |

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| 378 | Brooke DeRenzis | DC Applesseed | Environmental Group | Table 10.1 | 95 | The proposed schedule (p. 95) states that the remedial field investigation shall be initiated within 180 days of approval of the work plan and site plan. We believe that time line is much too long; if the work plan and site plans are approved in April, DDOE could miss the summer season for sampling. We recommend that the work begin within 30 days of plan approval, particularly since the bathymetric survey is reportedly already done. | Please see the response to Comment #306. |
| 379 | Brooke DeRenzis | DC Applesseed | Environmental Group | Table 10.1 | 95 | As the environmental regulatory agency for the District, DDOE should have the authority to take water samples from the Anacostia River. (In fact, DDOE is required by law to take water samples, in part to assure compliance with the MS4 permit). However, the District will likely need permits for other sampling and field work. With respect to sediment samples, DC Applesseed understands that DDOE ordinarily seeks permission from the landowner before taking an invasive sample. DC Applesseed understands that the National Park Service took over a year to grant permission for sediment samples to be taken from the river bottom in connection with the PEPCO cleanup; Upon information and belief, Applesseed is advised that PEPCO submitted the proposed permit application on August 22, 2012, but that NPS failed to act upon it until September 1, 2013, and then suspended the permit on October 1, 2013 because of the government shutdown. To avoid such delay, we recommend that DDOE immediately apply for permits to cover all sampling that will be conducted in the RI work plan. We also request that DDOE make public the time line of permit applications and approvals so the public can follow the progress of the application. | DDOE immediately applied for all known sampling permits that will be conducted in the RI work plan. DDOE is committed to maintaining a rigorous and expeditious permit timeline and will continue to do so in the future. |
| 380 | Brooke DeRenzis | DC Applesseed | Environmental Group | Table 10.1 | 95 | The work plan schedule ends with completion of the final RI report. We recommend that DDOE include a separate schedule for initiation of the feasibility study, which it could begin once RI data are received in draft form, and possibly sooner. The start of the FS work need not await the finalization of the data from RI and or completion of the RI report. In fact, the NCP contemplates starting the FS before the RI is complete with regulations stating "[t]he FS emphasizes data analysis and is generally performed concurrently and in an interactive fashion with the remedial investigation (RI), using data gathered during the RI."30 (emphasis supplied). EPA's standard field practice does not require such phasing, but allows the two efforts to proceed in parallel, with the FS work starting once actual field work on the RI data gets | Please see the response to Comment #315. |
| 381 | Brooke DeRenzis | DC Applesseed | Environmental Group | Table 10.1 | 95 | The objective of the sediment project is to make the Anacostia River fishable and swimmable by 2032. In order for legacy toxins to be adequately removed from the environment by 2032, the ROD must be issued far enough in advance to allow for "construction" of the remedy and for recovery by the estuary. We urge DDOE to publish a target date for issuance of the ROD so the District's elected officials and the public can monitor the project's progress. In response to performance oversight questions, DDOE estimated that the RI would be complete in mid-2015.31 We believe that it is feasible for the District to meet this goal if it takes the steps we outlined above to accelerate the RI. In accordance with this schedule, we think that DDOE should aim to issue the ROD in 2017. This would give the District 15 years following the ROD to meet its swimmable, fishable Anacostia goal, which could be used to secure agreement of responsible parties, "construct" the remedy, and allow the estuary to recover. Depending on the remedy chosen, there is a good chance that the legacy toxins could be sufficiently removed from the environment by 2032 if this schedule is met. Issuing the ROD in 2017 would also allow the District to capitalize on the water quality improvements made by the Clean Rivers Project and the District's MS4 permit requirements. By starting actual remediation | Please see the response to Comment #315. |
| 382 | David Jonas Bardin | DC Water | Local Government | Section 3.1.2.2 | 29-32 | The Work Plan states that CSS outfall discharges also degrade water quality by causing elevated levels of pathogenic bacteria and increased biological oxygen demand (BOD). Elevated BOD can result in oxygen depleted zones unable to support aquatic life - but it omits key points and misunderstands progress to date even though it tries to recognize DC Water's part in the overall effort. DC Water set out to change that in two ways, the first of which the Work Plan overlooked: By restoring degraded facilities (such as inflatable dams), DC Water set out to get some results quickly and did so, pursuant to a Nine Minimum Controls Consent Decree, now completed with positive results. The second was the Long Term Control Plan (LTCP) mentioned in the Work Plan. | We acknowledge this comment. |
| 383 | David Jonas Bardin | DC Water | Local Government | Section 3.1.2.2 | 29-32 | Contrary to the Work Plan, 4 no one is considering a slow down or delay of DC Water's Anacostia LTCP program: DC Water has always given priority to the Anacostia portion of its LTCP. And although the Work Plan says the LTCP Consent Decree was "between EPA and DC Water" it is in fact a four-party Consent Decree signed by the Assistant Attorney General of the United States, the Regional Administrator of the United States Environmental Protection Agency, the General Manager of DC Water, and the City Administrator of the District of Columbia. | We will revise the referenced text (first full sentence at the top of Page 29) to note that the LTCP Consent Decree is a four-party Consent Decree signed by the Assistant Attorney General of the United States, the Regional Administrator of the United States Environmental Protection Agency, the General Manager of DC Water, and the City Administrator of the District of Columbia. |
| 384 | David Baron | Earth Justice | Environmental Group | Section 5 | | (E)very effort should be made to avoid duplicating work already done in prior studies. As documented in draft Work Plan and the attached report by the Anacostia Watershed Toxics Alliance, there have been 13 studies of sediment contamination in the Anacostia over the past 24 years. Collectively, these studies included analysis of 295 samples for PCBs, 314 for PAHs, and numerous for metals. In designing the RI here, DDOE should carefully evaluate the information already provided by this extensive sampling, and limit additional sampling and analysis to that necessary to adequately characterize the contamination problem for purposes of remedial action. | We agree with the commenter. As discussed throughout the work plan, DDOE intends to leverage existing data to the extent possible. |
| 385 | David Baron | Earth Justice | Environmental Group | Table 10.1 | 95 | Second, the schedule as set forth in Table 10.1 is far too protracted, and lacks absolute deadlines for any of the steps after the Public Comment Period for Draft Site Plans. For example, the table provides for initiating the RI Field Investigation "within 180 days of approval of the final Work Plan and Site Plans (weather and season permitting)." There is no justification for this 180-day delay: A 30-day time frame is more than sufficient to commence the RI Field Investigation. Moreover, the absence of a deadline for approval of the final Work Plan and Site Plans leaves this step without an absolute, outside deadline. There is no reason that DDOE cannot direct that final approved Work and Site Plans be in place by a date certain, no later than May 3, 2014. Subsequent steps in the schedule also lack outside deadlines, with each specifying time frames after a triggering event that itself has no deadline. These include: * Remedial Investigation Data Report due "60 days after receipt of laboratory analyses results from the field investigation." There are no deadlines for completing collection of samples, for submission of the samples for lab analysis, or completion of lab analysis. As written, there is nothing to prevent DDOE or its contractor from dragging that process out for years. Such an approach is untenable.1 The schedule needs to specify a prompt, outside deadline for completion of the RI Data Report. For example, an outside deadline of November 1, 2014 would allow ample time for sample collection, lab analysis, and preparation of the Data Report. * Final RI Report due "45 days after receipt of comments on the Draft RI Report." There is no comment deadline, so this timetable is also unacceptably open-ended. The schedule needs to specify a date certain to publish the Draft RI Report for public comment (e.g., 10 days after completion of the Draft RI Report) and a reasonable comment deadline (such as 45 days). | The schedule was designed so that work could be completed in a reasonably efficient time frame. The proposed schedule within 180 days incorporates several factors, including the release of several other deliverables related to performance of the fieldwork. With regard to outside deadlines, CERCLA investigations are complicated endeavors. These are processes and sites that do not lend themselves to outside deadlines chosen arbitrarily – and in fact may serve to hinder the overall performance of the project. The schedule on the other hand, attempts to space out (and provide cushion for) normal and unforeseen delays to an inherently complicated process. |
| 386 | David Baron | Earth Justice | Environmental Group | Table 10.1 | 95 | DDOE needs to add a separate timetable for the Feasibility Study (FS). Much of the FS work can and should proceed concurrently with the DDOE needs to include a deadline for issuance of the Record of Decision (ROD). If the RI and FS are put on prompt, firm schedules as we advocate, then an appropriate deadline for the final ROD would be January 1, 2017. | Please see response to Comment #308. Please see response to Comment #315. |
| 387 | David Baron | Earth Justice | Environmental Group | Table 10.1 | 95 | DDOE needs to make firm commitments to adhere to the schedules set in the Work Plan. Already the Department has fallen behind the schedules for the first six tasks outlined in Table 10.1. Adherence to date certain schedules is essential to prevent indefinite delay in the long overdue cleanup of the Anacostia's contaminated sediment. | Please see response to Comment #315. |
| 388 | David Baron | Earth Justice | Environmental Group | Table 10.1 | 95 | A thorough and expeditious assessment of sediment toxics is essential to making the Anacostia a fishable, swimmable river and the valuable asset that our community deserves. The clean-up remedy should be selected by 2017 to leverage other clean-up efforts, including DDOE's new stormwater regulatory program and DC Water's Clean Rivers Project for reducing combined sewer overflows. | Please see response to Comment #315. |

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| 390 | Rebecca Hammer | Natural Resources Defense Council | Environmental Group | Table 10.1 | 95 | DDOE should shorten the period to begin the Remedial Investigation from 180 days to 30 days following approval of the final work and site plans to ensure that the process continues expeditiously. In order to achieve this schedule, DDOE should begin applying immediately for all required permits needed to perform the RI. Bringing public attention to the permit applications will help guarantee that federal entities like the National Park Service act on those applications promptly. | Please see response to Comment #306. |
| 391 | Rebecca Hammer | Natural Resources Defense Council | Environmental Group | General | | To avoid political and bureaucratic delay, DDOE should confine reviews of technical documents and drafts to DDOE's own technical review team and staff. | We acknowledge this comment. |
| 392 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Section 1.4 & Table 4.1 | 2 & 40 | We understand that the study area is defined as the tidal river from bank to bank and that the Project's primary scope does not address adjacent wetlands and floodplains (p. 2, Section 1.4). However, we request clarification of the statement (also on p. 2) that, "... additional future investigations, not covered by this work plan, may be performed in the river wetlands and floodplain." Additionally, it is not clear whether DDOE will follow any contamination outside the designated study area boundaries if contaminant concentrations are found to be elevated in certain areas near the boundaries. While it seems this might be the intent based on the statement on p. 40 that, "if new potential sources of contaminants or hotspots are identified, additional sampling may be warranted," it is not made clear in the draft Work Plan that DDOE has the discretion to do such additional sampling now. We urge that the language clearly state that this is an option and that permits be obtained accordingly. | As discussed in the response to Comment #108, adjacent floodplain and wetlands may be characterized, as appropriate, through investigations conducted external to the RI. The development of any additional details regarding the process, methods, timing and extent of these investigations is premature at this time. |
| 393 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Section 1.4 & Table 4.1 | 2 & 40 | We also understand that sampling in adjacent wetlands and floodplains was never intended to be part of this study and that requesting its inclusion now would require a change in project scope that would likely delay the investigation. Instead, we ask that the investigation team promptly flag for further investigation new adjacent areas (if any) where findings indicate elevated levels of contamination likely to require remediation; and that DDOE recommend a preferred method or alternatives for further investigation to be conducted to the extent possible in parallel with this RI/FS and subsequent ROD process. Such alternatives would include amending this plan or the prompt initiation of a separate plan | Please see response to Comment #392. |
| 394 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Section 1.4 & Table 4.1 | 2 & 40 | (Regarding adjacent wetlands and floodplain,) (we raise this matter (sampling in adjacent wetlands and floodplain) in a good faith effort to anticipate any potential additional work that later may be deemed necessary for the final and complete characterization of contaminants and the ultimate selections of remedies to address all of them. We do not anticipate the necessity of additional work, but recognize it as a possibility due to the complexity of the problem, including the possibility of past contaminant transport to adjacent floodplains or wetlands by large storms or past dredging or engineering work. The draft Work Plan is admirably designed to complement and integrate work completed or underway from previous studies and from known landside contaminated sites. To expedite the ultimate cleanup, it is prudent to now also consider options for proceeding expeditiously should the Project identify additional work necessary for complete toxics remediation from the river system. We therefore ask that Project managers be prepared to provide the relative magnitude of adjacent or upstream contaminant sources and sinks and provide solid guidance for how best to approach their characterization and remediation in a | We acknowledge this comment. |
| 395 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Table 2.5 | | For analytes listed in Table 2.5 as NSL (i.e., No Screening Level is defined for analyte), what guidance will be used to determine whether or not the concentration of analytes found are of concern or pose risk to environmental and/or human health? | Environmental samples are often analyzed for constituents that lack screening values or action levels. At sites like the Anacostia River, where numerous contaminants have been released over a wide area for many years, remedial decisions tend to focus on technically-defensible risk drivers for which adequate toxicological data are available to support the risk assessment. The absence of screening values for some constituents is a direct result of a lack of experimental data on the effect of those constituents. Constituents that lack screening values may be evaluated qualitatively in the risk assessment. One way these constituents are addressed in the risk assessments is by comparison with background or ambient concentrations. Another way is to evaluate the concentrations at the site with respect to the published toxicological literature. We typically identify surrogates based on structure-activity similarities (for example, using 4,4'-DDT to represent 4,4'-DDE). However, it is premature to conduct detailed literature reviews of all constituents that lack screening levels. The frequency of detection is also considered when deciding how to evaluate a constituent that has no screening value. Constituents that are found to be elevated with respect to background or ambient |
| 396 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Table 4.1 & Section 5.1 | 40 & 64 | We are also concerned that only select samples will be analyzed for PCB congeners (p. 40 & 64). This could potentially result in some PCB congeners being overlooked in areas not selected for analysis. Therefore, we suggest that DDOE analyze all sediment samples for all PCB congeners/arocloris (sometimes used interchangeably). Doing so will likely be more costly, but it will also guarantee a more accurate identification of responsible parties. If this advisement is not taken and it is decided that DDOE will not analyze all sediment samples for PCB congeners, the draft Work Plan should be revised to clarify how those samples selected for further analysis will be selected. | Please see response to Comment #371. |
| 397 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Sections 4 and 5 | | PCB contaminants in the river are a major concern because of their chemical stability, bioaccumulation, and persistence in the environment even with the ban of their manufacture in 1979. Because these substances are so hazardous and damaging to the environment and human health (even at concentrations as low as 1 part per million (ppm)), we recommend that DDOE use a more rigorous sampling protocol for PCBs because as it stands in the draft Work Plan, some areas of contamination could be potentially overlooked. Relying on field screening alone could mean that the low concentration areas could be missed resulting in misinformed remedy selection. | Please see response to Comment #301. |
| 398 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Section 3 | | Re-suspension and deposition of contaminated sediment is another concern that does not seem to be adequately addressed in the draft Work Plan. There are several factors that can cause contaminated sediments to be re-suspended in water and re-deposited in sediment (e.g., activity of benthic or semi-benthic organisms, heavy rain storms and other extreme weather events). We suggest that DDOE address these phenomena in the Work Plan. | Please see response to Comment #1. |
| 399 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Section 1 | 2 | The draft Work Plan states that a Natural Resource Damage Assessment (NRDA) will be completed at a later date pursuant to a separate work plan" (p. 2). We understand that this draft Work Plan is for the RI and not the NRDA, however since data for the NRDA is being collected concurrently with the RI, it is appropriate and helpful to include additional information about the NRDA and its schedule in this plan. | This Work Plan is not intended to qualify as an NRDA, it states that DDOE will attempt to collect data that will be useable once the NRDA is performed at a later date. We can cite the specific NRDA regulations and clarify what the document does and does not do. We will clarify the referenced text and provide additional discussion regarding NRDA process in a revised version of Section 9. |

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| 400 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Table 10.1 | 95 | Shorten the period to begin the Remedial Investigation (RI) from 180 days to 30 days following approval of the final work and site plans. This should allow completion of sediment sampling this summer, an important benchmark, and completion of the RI by mid-2015. Update the schedule of activities, Table 10.1 (p.95), to include these changes and to account for the missed deadlines to date. | Please see response to Comment #306. |
| 401 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Table 10.1 | 95 | The schedule ends with completion of the final RI report. We recommend that DDOE include a separate schedule for initiation of the feasibility study (FS), that it begin as soon as sufficient field data is available, and that it be conducted concurrently with the RI as permitted by EPA protocol. As recommended in DC Applesseed's comments, we and other members of United for a Healthy Anacostia River coalition ask for inclusion of a target date for developing and issuing the Record of Decision (ROD) by 2017. This would also preserve the option of completing the toxics cleanup by 2025, a goal of AWS and a benchmark for other major cleanup initiatives. It would also be helpful to include task schedules in the Work Plan for project planning, field data collection, and data analysis. | Please see responses to Comments #308 and #315. |
| 402 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | Table 10.1 | 95 | To minimize political and bureaucratic delay, confine internal reviews of technical documents and drafts to DDOE's technical review staff and advisors. There will be ample time for policy review during preparation of the Record of Decision. As Table 10.1 shows, this draft Work Plan was delayed several months by unnecessary and unproductive reviews by Administration officials. | DDOE does not plan to release for public comment documents of scientific or technical nature, such as the draft site plans (FSP/QUAPP/HASP), which will reduce delay in this project. When appropriate, District officials will be consulted to ensure they are briefed on the project and their input is incorporated into the process. |
| 403 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | General | | We are encouraged to hear from DDOE that it has already applied for many or all required permits. To avoid needless delays obtaining permits, we also ask DDOE to publicly report on the status of all permit applications, especially those with the National Park Service. | We acknowledge this comment. |
| 404 | Jim Foster, Dan Smith, Lori Baronoff | Anacostia Watershed Society | Environmental Group | General | | We commend DDOE for proposing a strong draft Work Plan, already completing the bathymetric survey, and for taking steps to accelerate permit approvals. We also applaud DDOE and the District for taking the lead on this important study, a necessary step to comprehensively address toxic pollution in the Anacostia River. Thank you again for the opportunity to comment on the draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. We are encouraged to see this process moving forward, if these comments are incorporated we believe the Anacostia River will be well on its way toward effective remediation. We look forward to continuing to work with you to ensure the restoration of the river and its tributaries for the betterment of human and environmental health. | We appreciate this comment. |
| 405 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 1.0 | | NOAA, as a co (federal) natural resource trustee, agrees that information and data obtained from this investigation can be used to assess natural resource injuries to trust resources in the Anacostia River. A more specific strategy, in consultation with DDOE, DOI, and other potential trustees, will need to be developed. | To the extent practicable, DDOE will incorporate NRDA issues and related work during the remedial investigation and the subsequent feasibility study. A more specific NRDA strategy will be developed -- we will be in contact with your team to convene a work group on this matter. |
| 406 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 1.4 | 2 | Section 1.4 Scope, on Page 2, states that for the purposes of this WP, the scope includes the tidal river from bank to bank and excludes adjacent wetlands and floodplain surface soil. While these areas have been significantly impacted via physical alterations, samples collected in these areas could be very informative and indicative of both historic and current releases in some cases. These areas may also be data gaps relative to specific investigations. Please indicate whether any potential wetland or floodplain areas were considered for sampling. Furthermore it should be mentioned that restoration of these habitats has been identified as a significant activity to achieve Anacostia restoration goals and briefly describe efforts to identify restoration opportunities for these habitats. Contaminant data in these areas could be beneficial for restoration planning efforts. | As discussed in our response to Comment #108, the scope of the RI is necessarily, from an administrative standpoint, limited to the mainstem river channel, Kingman Lake, and Washington Channel under average stage conditions. We agree that the investigation of some portions of the adjacent wetlands and floodplain would be beneficial. DDOE believes that limiting the investigation to the channel from bank to bank is a necessary first step to help target what portions of the floodplain and which wetlands should be subjected to investigation. |
| 407 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 1.4 | 2 | Section 1.4 Scope, On Page 2, also states that sampling locations defined in this WP were biased away from portions of the river that are associated with the adjacent environmental sites. NOAA recommends that the scope be revised to indicate that sampling locations will compliment site specific investigations by addressing spatial data gaps and attempting to address issues associated with conglomered or non site related sources of contamination in order to help with remedial planning and injury quantification efforts at specific sites. | The RI will incorporate a significant amount of data collected in the designated RP sites. That data was collected by others. The focus of this effort is on areas outside of the RP sites. In order to augment the data sets and verify sampling results for these sites, we will also collect some samples within the boundaries of the RP sites. However, most sampling defined in the RI will be away from the immediate vicinities of the RP sites. |
| 408 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Figure 1.1 | | Figure 1.1 - Please provide the source and date for the wetland types indicated on the figure. Specifically freshwater tidal emergent wetland locations should be identified. The map does not seem to accurately depict these wetlands. | Please see response to Comment #215. |
| 409 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 2.7 | 22 | Section 2.7 Data Usability, Screening levels, on Page 22, states that soil and groundwater concentration results are compared to EPA Regional Screening Levels (RSLs) for industrial soil and residential tapwater. This data should also be screened against EPA BTAG (ecological) screening levels for soil and groundwater as well as considering their potential transport to the River (i.e. soil levels compared to sediment benchmarks, groundwater to surface water benchmarks). | In response to this comment, a table has been added that lists freshwater sediment threshold effects levels (TELs), probable effects levels (PELs), and severe effects levels (SELs). In addition, surface water acute and chronic water quality criteria are also included in the table. The TELs, PELs, and SELs are taken from the Sediment Quick Reference Tables maintained by NOAA. The surface water criteria were obtained from the U.S. Ambient Water Quality Criteria maintained by EPA. The project team believes that these above-noted levels are more appropriate than the BTAG ecological screening levels for soil and groundwater recommended in the |
| 410 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 2.7 | 22 | Section 2.7 Data Validation, on Page 22, should describe that data validation is a Superfund term and compare/contrast data validation with QA/QC. Although historical data may not have been "validated" and may have been derived from non Superfund methods (to achieve finer resolution and meet DQOs) the sampling was performed with appropriate QA/QC provisions. | We will clarify the referenced text (third paragraph on Page 22) in accordance with the information provided in the comment. |
| 411 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Figure 2.1 | | Figure 2.1 is the first location where the sediment AOCs derived via AWTA activities are identified. Background information on the identification of the AOCs should be presented in Section 2. | We will revise Section 1.4 to reference the analyses conducted in the "2009 White Paper" prepared by AWTA. |
| 412 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 2.2 | | Section 2.2 should describe the impacts that construction of the seawall had on tidal emergent wetlands as well as its current state. In several areas the seawall has failed or is failing and there are some limited tidal connections being reclaimed. | Section 2.2 will be revised in accordance with this comment. |
| 413 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 2.6.1 | 12 | Section 2.6 - Previous Environmental Investigations and Ongoing Activities, on Page 12, DDOE ongoing and EPA ongoing, describes the sampling being conducted for NPDES permits and review of the TMDL. This section should describe how the monitoring data can support the RI, specifically addressing COCs and potential risk drivers previously identified from the AWTA investigation. It does not appear PCBs and PAHs are adequately being monitored. If additional monitoring data from the stations is required to support the RI this should be specifically stated and a plan to collect the data should be proposed. It does not appear that additional data to assess loads of COCPs and especially the risk drivers will be collected in Section 5. | The TMDL discussion is intended as a summary of current monitoring and associated TMDL-related investigations that are ongoing. DDOE believes that sediment sampling results can help define goals for the TMDL program, which is separate and distinct from the RI. An appropriate role for the RI is, therefore, to make appropriate recommendations regarding TMDL monitoring priorities. Since any such recommendations must await the performance of field sampling for the RI and associated analysis and reporting, the RI report is the appropriate venue for indicating any such recommendations. No changes will, therefore, be made in response to this comment. |
| 414 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 3.1.1 | 23 | Section 3.1.1, Constituents of Potential Concern, on page 23, states that COCPs include PCB Aroclor constituents on the EPA Priority Pollutant List. This sentence should be refined to include PCBs on the list. Specific sampling, source evaluations, and risk assessment approaches for PCBs should be developed in subsequent work plans. | Assuming the commenter is referring to the list of 209 PCB congeners, these constituents will be analyzed in 100 percent of surface sediment samples and 20 percent of subsurface samples. We agree, therefore, that "PCB congeners (209)" should be added to the referenced sentence (first sentence, Section 3.1.1). |
| 415 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 3.1 | 30 | Section 3.1, Release Mechanisms, on Page 30, should described that River bedload sediments may be acting as a secondary source of contaminants if they are resuspended by physical and biological processes. | We agree with the commenter; the text will be revised to indicate the re-suspension of contaminated sediment is a secondary source of sediment contamination. |
| 416 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 3.1.4 | 31 | Section 3.1.4, Exposure Media, on Page 31 should indicate that wetland soils/sediments and floodplain soils may be a source of exposure to ecological receptors, including those in the River. | We agree that overbank deposition of sediments during flood events may result in a source of exposure of ecological receptors to site contaminants. However, the CSM boundaries as defined in the work plan need to be consistent with the study area (DQO) problem boundaries. Since by definition the floodplain soils are not included in the study area, the text will not be revised as requested in this comment. |

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| 417 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 3.1.5 | | Section 3.1.5, Transport Mechanisms, should identify that sediments are also deposited in the River in close proximity to the release points, especially in the Lower River. | The text will be revised consistent with this comment. |
| 418 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 4.1 | 37 | Section 4.1 Data Quality Objectives, on Page 37, should indicate that an objective is to monitor and evaluate contaminant concentrations in the River as part of the larger contaminant study, which was comparable to an RI, performed by AWTA. This information will help evaluate the effect of natural attenuation and source control actions performed in the watershed. | The existing text in Section 4.1 states one of the objectives is to update the project database, which includes the AWTA 2000 results. Natural attenuation, sedimentation, source control actions, and other recent developments will be incorporated into the study's findings. No changes will be made in response to this comment. |
| 419 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 5 & Table 5.1 | 61 | Section 5 Remedial Investigation and Table 5.1, Summary of Planned Sampling Activities, on Page 61 provides an overview of the number and types of samples to be collected in the RI. NOAA will provide specific input on these activities as part of the review of the more specific Field Sampling Plan. | We acknowledge this comment. |
| 420 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 7.2 | 78 | Section 7.2, on Page 78, discusses the baseline ecological risk assessment. Several of the data collection activities, such as toxicity testing and bioaccumulation studies, are typically considered BERA tasks. Screening level ERA generally compare media concentrations to risk based screening numbers. A BERA should be part of the RI report. If additional BERA work is required a Phase II BERA work plan may be required. | We agree with the commenter. The RI report will include a SLERA (Steps 1 and 2) and a BERA (Steps 3 through 8). If additional field work is required to complete the BERA, a separate follow-on WP will be prepared. |
| 421 | Simeon Hahn | U.S. DOC NOAA | Federal Government | Section 9 | 94 | Section 9, NRDA, on Page 94 describes NRDA tasks. Task 7, Post Assessment Report, should be referred to as restoration planning with the outcome being a restoration plan. | The WP will be revised as suggested. |
| 422 | Kael Anderson | Southwest Neighborhood Assembly, Inc. | Environmental Group | General | | The Southwest Neighborhood Assembly (Assembly) strongly supports the efforts of the District Department of the Environment (DDOE) to initiate a study to investigate toxic pollution in the Anacostia River. It is in fact, long overdue and greatly needed by the Washington, D.C. Metropolitan Area, as well as the entire Chesapeake Bay Region. The ecosystem is dangerously contaminated, and the river is considered to be one of the nations most polluted. | We acknowledge this comment. |
| 423 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | General Comment | N/A | The Work Plan is well researched, organized and written. | We acknowledge this comment. |
| 424 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | 2.6.2 | 15 | The 1999 site specific investigation for the WGL site was an RIFS by Hydro-Terra. The December 2011 Statement of Work is part of the East Station Consent Decree, not a National Capitol Parks-East document. | We acknowledge this comment and will revise the referenced text accordingly. |
| 425 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | 2.6.2 | 16 | WGL is conducting additional characterization of the nature & extent of contamination, etc.... in accordance with the 2011 Statement of Work as part of OU2. It is not noted in the RD/RA which pertains to the OU1 work. | We acknowledge this comment and will revise the referenced text accordingly. |
| 426 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | Table 3.2 | N/A | The 1999 East Station RIFS lists different Constituents of Concern for soil, ground water and sediment than shown in this table. What does "coal tar and wastes" refer to in the surface soil, groundwater and sediments COC columns? Mercury is not listed as a COC in surface water in the 1999 East Station RIFS. | We will revise Table 3.2 so that is consistent with the list given in the 1999 East Station RI/FS. |
| 427 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | 4.2.7.2 | 56 | WGL is conducting an RIFS rather than RD/RA to include characterization of sediments... | We acknowledge this comment and will revise the referenced text accordingly. |
| 428 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | 4.3.2 | 59 | Ground water pump and treatment has been operating at East Station since 1976. Recovery of DNAPL directly from wells has been taking place since 1995. | We acknowledge this comment and will revise the referenced text accordingly. |
| 429 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | 4.3.3 | 59 | It is very likely that other significant sources of ground water contamination to the river and its tributaries exist beyond the six known sites, which should not be ignored. | Please see response to Comment #241. |
| 430 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | General Comment | N/A | We did not notice any discussion about background sampling which is an important element of a Remedial Investigation. | Please see the response to Comment #141. |
| 431 | Mary Jean Brady | Washington Gas Light Co. | Commercial Entity | CIP, Appendix B | 11 | Washington Gas Light Company does not have an "and" in its name. | We acknowledge this comment and will revise all occurrences of "Washington Gas and Light Company" to "Washington Gas Light Company." |
| 432 | Kelsey O'Brien | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 433 | Simon Plog | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 434 | Alecia Donaldson | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 435 | Ann DeSonetis | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 436 | Chris Meyers | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 437 | Tatiana Torres | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |

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| 438 | Margie Noenan | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 439 | Dale Manty | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 440 | Alex Roche | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 441 | Olivia Martin | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 442 | Cathy Smith | None | General Public | General | | Please accept my comments on DDOE's Draft Remedial Investigation Work Plan for the Anacostia River Sediment Project. Thorough and expeditious assessment of river toxics is critical to making the Anacostia River fishable and swimmable, and the valuable asses our communities deserve. Please expedite the schedule so that field work can be completed this year. And keeping with standard EPA practice, conduct the feasibility study (FS) at the same time as the remedial investigation (RI). The cleanup remedy should be selected by 2017 so that the cleanup can be completed by 2023 when the CSO reductions and other measures will be implemented. | Please see responses to Comment #308 and Comment #315. |
| 443 | Liz Langston | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to cleaning up the river as soon as possible. The river's reputation is awful, and has been for far too long. As a resident, I hope that our community and visitors to DC can soon enjoy a river free of health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE must establish an ambitious schedule to complete the investigation and decide on a course of action. Thanks for your efforts to clean up the District's rivers - I urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 444 | Rumi Matsuyama | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 445 | Melody College | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 446 | Ligia Erclius-DiPaola | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 447 | Eric Miller | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 448 | Jason Berry | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 449 | Jennifer Arevalo | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 450 | Taylor Dankmyer | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 451 | Kimberly Jones | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 452 | James Swann | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

Remedial Investigation Work Plan, Anacostia River Sediment Project, Washington DC

| Number | Commenter/ Representative | Organization | Type | Section/Table/Figure Nos. | Page No. | Comment | Response |
|--------|---------------------------|--------------|----------------|---------------------------|----------|---|------------------------------|
| 453 | Amy Mall | None | General Public | General | | I live in SW DC, very close to the Anacostia River. I would love to recreate on the River. I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 454 | Jeremy Burningham | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 455 | Keisha Jackson | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 456 | Katja Sipple | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 457 | Suzu Forwood | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 458 | Alexander Wojcicki | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 459 | Mary Ellen Kustin | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 460 | Nancy Hernandez | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 461 | Abigail Clark | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 462 | Karina Tayag | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 463 | Jess Wells | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 464 | Sabrina Morin | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 465 | William Brammer | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 466 | Pete Childs | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 468 | Kate Mazurek | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 469 | Michael Campbell | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 470 | Iori Gould | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 471 | Martin Hazeltine | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 473 | Kelly Bollwahn | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 474 | Nancy Strong | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 475 | Esperanza Gaillard | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 476 | Adam Dolezal | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 477 | Sonia Reyes | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 478 | Katrina Lawrence | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 478 | Wayne Saward | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 479 | Anne Hudson | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 480 | John Hughes | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 481 | Melissa France | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 482 | Michael Berry | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 483 | Allison McBride | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 484 | Harry Bryant | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 485 | Synte Peacock | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 486 | Alice Linden | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 487 | Andromeda Scheller | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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|--------|---------------------------|--------------|----------------|---------------------------|----------|--|------------------------------|
| 488 | Brittany Forniotis | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 489 | Judith Wecker | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 490 | Tia Young | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 491 | Denise Hoffman | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 492 | David MacDonald | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 493 | James Kirks | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 494 | Christine Montgomery | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

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| 495 | Andrea Lawson | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 496 | Isabella Teeuwen | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 497 | Kendra Demeo | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 498 | Annie Wong | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 499 | Armand Cann | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 500 | Veronica Swain | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |
| 501 | Esther Lent | None | General Public | General | | I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible. | We acknowledge this comment. |

| Number | Commenter/ Representative | Organization | Type | Section/Table/Figure Nos. | Page No. | Comment | Response |
|--------|------------------------------|--------------|----------------|---------------------------|----------|---|-------------------------------------|
| 502 | Lillian McCrory | None | General Public | General | | <p>I strongly support your efforts to investigate toxic pollution in the Anacostia River's sediments and decide on a course of action to clean it up. I urge you to finalize the work plan immediately and commit to an ambitious schedule for the investigation so that the cleanup itself can begin. Residents of Washington, DC and visitors to our nation's capital deserve a clean Anacostia River that's free from health-endangering pollution. Right now, a good portion of the river's sediments have dangerously high levels of metals, pathogens, bacteria, pesticides, herbicides, PCBs, and other chemicals. We must develop a plan to remove this decades-old toxic contamination from the river bottom that still remains in the ecosystem today. It's time to make the river safe again for swimming, fishing, boating, and other recreational activities that Washingtonians enjoy. The draft work plan being developed by DDOE for its clean-up study is an important milestone, but it is only the first step in restoring the river. The work plan must establish an ambitious schedule to complete the investigation and decide on a course of action. The District of Columbia's residents and visitors cannot tolerate any more delay. I thank you for your efforts to clean up the District's rivers and urge you to clean up this toxic contamination as soon as possible.</p> | <p>We acknowledge this comment.</p> |