EXECUTIVE SUMMARY

REVISED CLEANUP ACTION PLAN
VOLUNTARY CLEANUP PROGRAM
BUZZARD POINT D.C. UNITED SOCCER STADIUM DEVELOPMENT
WASHINGTON, D.C.

by Haley & Aldrich, Inc.
McLean, Virginia

for McKissack & McKissack
Washington, D.C.

File No. 40223-002
October 2015
13 October 2015
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McKissack & McKissack
901 K Street, NW 6th Floor
Washington, D.C. 20001

Attention: Mr. Mark Babbitt, P.E.

Subject: Executive Summary
Voluntary Cleanup Program
Buzzard Point D.C. United Soccer Stadium Development
Washington, D.C.

Ladies and Gentlemen:

Haley & Aldrich, Inc., prepared the “Cleanup Action Plan” dated 2 August 2015 for eight Buzzard Point parcels (Figure 1) located in southwest Washington, D.C. (Site). The “Revised Cleanup Action Plan” (CAP) dated 30 September 2015 was then prepared based on comments received from the District of Columbia Department of Energy & Environment (DOEE) and D.C. United. The CAP was prepared to supplement the Voluntary Cleanup Program (VCP) application submitted to the DOEE on 3 March 2015 and approved on 28 July 2015. The Site was enrolled in the VCP because of documented petroleum releases and reported chemical concentrations. As part of the VCP, the chemical concentrations in soil at the Site that may pose a risk to human health and/or the environment will be voluntarily cleaned up as part of the excavation necessary to construct the new D.C. United professional soccer stadium. The purpose of the CAP was to summarize the investigation activities and analytical evaluations, describe the recommended cleanup action and rationale for remediating soil in conjunction with Site redevelopment, and document the potential need for mitigating post-construction vapor intrusion concerns into the completed stadium.

The Site was divided into two areas to facilitate redevelopment: the Stadium Development area and the Ancillary Development area (Figure 1). This Executive Summary only applies to the CAP prepared for the Stadium Development area that will contain the future stadium. The “Cleanup Action Plan” for the planned Ancillary Development area dated 2 August 2015 was submitted to the DOEE and may be revised when the development plans for that area have been finalized.

The stadium construction plans and foundation design were not finalized when the CAP was prepared; however, the concept design required Site excavation no deeper than 10 feet below ground surface (bgs) for foundation construction. As such, soil containing chemicals deeper than 10 feet bgs and groundwater (approximately at 20 feet bgs) will not be encountered by the construction worker and future Site occupant (i.e., commercial worker, recreational visitor, and soccer player). Therefore, only soil within the top 10 feet was considered when determining areas requiring remediation. Should
redevelopment plans change and require excavation deeper than 10 feet bgs, the DOEE will be notified and the CAP revised accordingly.

Previous environmental investigations were conducted at the Site in several phases since 1990 and documented in reports submitted to the DOEE. Groundwater monitoring wells and soil sample locations from more recent investigations are shown in Figure 1. Samples were collected from areas identified as potential environmental concerns based on historical and current Site operations, the results of previous investigations, and Site accessibility (understanding that sampling was limited by restrictions associated with Site buildings and structures shown in Figure 1 and restrictions associated with active facilities).

These sample locations shown in Figure 1 were determined based on historical and current Site operations, the results of previous investigations, and Site accessibility (limited by restrictions associated with Site buildings and structures shown in Figure 1 and restrictions associated with active facilities). These investigations collectively identified the following chemicals of potential concern (COPCs):

- Volatile organic compounds;
- Semi-volatile organic compounds;
- Total petroleum hydrocarbons;
- Polychlorinated biphenyls; and
- Metals.

Soil sample analytical results for these COPCs were compared to the following screening levels:

- D.C. Tier 0 Soil Standards from the Tier 0 Standards Final Rulemaking published at 40 DCR 7835, 7892 (12 November 1993), as amended by Final Rulemaking published at 46 DCR 7699 (1 October 1999); and
- Environmental Protection Agency (EPA) Regional Screening Levels for Industrial Soil from the EPA Regional Screening Level Tables (June 2015).

Locations with soil sample analytical results exceeding these screening levels were designated areas of potential concern (AOPCs) and may require remediation. A baseline human health risk assessment (HHRA) will be conducted prior to redevelopment to better understand the COPCs at the Site that may pose a threat to human health greater than acceptable risk thresholds. The baseline HHRA may include additional soil sample collection and will include soil gas sample collection. A chemical leaching potential evaluation will also be completed to identify chemical concentrations in vadose zone soil that are protective of groundwater and surface water quality should leaching to groundwater occur. The baseline HHRA and leaching potential evaluation will determine maximum chemical concentrations in soil (i.e., risk-based goals [RBGs]) that are protective of both human health and groundwater/surface water quality. Areas at the Site with chemical concentrations in soil that exceed the RBGs will be designated AOPCs and require remediation or mitigation.
AOPCs will be remediated by excavation and off-Site disposal during redevelopment. Environmental monitoring will be conducted by an environmental consultant during mass excavation for stadium construction. The environmental consultant will direct AOPC excavation, segregation, and proper off-Site disposal. The environmental consultant will also screen soil outside of the designated AOPCs to confirm that potential chemical impacts do not extend beyond the areas identified during previous environmental investigations. Should additional chemical impacts be observed, that area will be assessed, and if warranted, properly remediated. Confirmation soil samples will be collected at remediated AOPCs and during environmental field screening and submitted to a licensed analytical laboratory for analysis.

Once remediation by mass excavation for stadium construction is complete, a post-remediation HHRA will be conducted to evaluate the remaining in-place chemical concentrations in soil. The post-remediation HHRA will include additional soil gas sample collection to determine if vapor intrusion mitigation is warranted during stadium construction. Post-remediation groundwater monitoring will also be conducted to ensure that chemicals in groundwater are not migrating off-Site. A groundwater monitoring program will be established with DOEE approval to define groundwater monitoring frequency and list the analyses for groundwater samples.

Please do not hesitate to call if you have any questions or comments.

Sincerely yours,
HALEY & ALDRICH, INC.

Dana L. Kennard, P.E. (AZ 57689)
Assistant Project Manager

David A. Schoenwolf, P.E.
Principal Consultant | Senior Vice President

Attachments:
    Figure 1 – Site Plan
GROUNDWATER MONITORING WELL LOCATION
SOIL SAMPLE LOCATION
240

S O I L  S A M P L E  L O C A T I O N
120

2nd Street SW
1711 1ST STREET, SW
SQUARE 0805, LOT 0002
1. OWNED BY DISTRICT OF COLUMBIA
SQUARE 0661, LOT 0800
2. OWNED BY DISTRICT OF COLUMBIA
SQUARE 08035, LOT 0800
3. OWNED BY ROLLINGWOOD
REAL ESTATE LLC (JEN)
1711 1ST STREET, SW
SQUARE 0805, LOT 0007
4. OWNED BY SUPER SALVAGE,
INC.
1711 1ST STREET, SW
SQUARE 0805, LOT 0002
5. OWNED BY POTOMAC ELECTRIC
POWER COMPANY
SQUARE 0661, LOT 0805
6. OWNED BY POTOMAC ELECTRIC
POWER COMPANY
SQUARE 0661, LOT 0804
7. OWNED BY POTOMAC ELECTRIC
POWER COMPANY
30 SQUARE 0803, LOT 0024
8. OWNED BY SW LAND HOLDER
LLC (ARKRIDGE)
SQUARE 0807, LOT 0013
9. OWNED BY SW LAND HOLDER
LLC (ARKRIDGE)
SQUARE 0807, LOT 0013
NOTES:
1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. BASE IMAGE BASED ON PUGmetry DATED: APRIL 2015.
PROPERTY OWNERS

FIGURE 1