

March 14, 2012

VIA ELECTRONIC MAIL  
and U. S. MAIL

Mr. Paul Connor  
Deputy Director  
Environmental Protection Administration  
District Department of the Environment  
1200 First Street, N.E., Room 516  
Washington, D.C. 20002

**Re: Response to DDOE's Comments on the Benning Road Remedial Investigation and Feasibility Study Draft Scope of Work**

Dear Mr. Connor:

Following up our discussions on March 5, 2012, this letter summarizes the response of Potomac Electric Power Company and Pepco Energy Services, Inc. (collectively, "Pepco") to DDOE's comments on the draft Scope of Work (SOW) for the Benning Road Facility Remedial Investigation and Feasibility Study.

Enclosed for your review is a markup of the draft SOW that shows Pepco's proposed revisions to address DDOE's comments. Also included is a revised Figure 2 that shows the expanded area of investigation within the Anacostia River. Some of the proposed revisions simply incorporate the edits reflected in DDOE's markup of the initial draft SOW. In other cases, the changes are made to address DDOE's written comments on the initial draft, as supplemented by our discussion on March 5<sup>th</sup>.

On the proposed revisions, we wish to elaborate on two points that were brought to your attention during the March 5<sup>th</sup> call. First, as shown on the revised Figure 2, Pepco has agreed to expand the waterside study area approximately 500 feet further downstream to include the location of sampling point PB-SD-04 from the 2009 Tetra Tech study commissioned by EPA. This additional area of investigation is outside the agreed scope of the study area specified in the SOW Outline (See Appendix A) that defines Pepco's obligations under the Consent Decree. The second bullet under Section 1.2 of the Outline states that the area to be investigated will extend approximately 1500 feet to the south of the main storm water outfall and that the Benning Road bridge was the approximate southern boundary of the study area. Nonetheless, in the interest of moving forward with the project without delay, Pepco will agree to expand the waterside study area as requested.

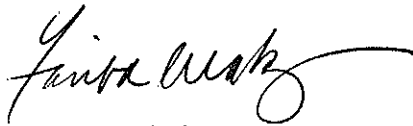
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Paul Connor  
District Department of the Environment  
March 14, 2011  
Page 2

Second, Pepco has also agreed to revise the draft SOW to accommodate DDOE's request that the Human Health Risk Assessment and the evaluation of remedial requirements should include potential exposures to landside receptors, and not just waterside receptors. We believe that this approach again exceeds the agreed scope of work as documented in the SOW Outline. The agreed objective of the landside investigation, as stated in Section 3.0 of the SOW Outline, was "to prevent migration of any chemicals of concern to the Anacostia River." From Pepco's perspective, focusing on the river, rather than on landside receptors, was reasonable and appropriate in view of the fact that the Benning Road facility is an active industrial site to which access is strictly controlled on a 24-hour basis, and on-Site receptors are currently protected by various administrative and engineering controls. Based on our discussion on March 5<sup>th</sup>, we understand that DDOE agrees that these controls should be taken into account in developing the conceptual site model, identifying incomplete exposure pathways that can be eliminated from the full risk assessment process, and evaluating the need for active remediation for on-Site contaminated media.

Please advise if the proposed revisions to the draft SOW are acceptable to DDOE, and we will finalize the document.

Sincerely,



Fariba Mahvi  
Lead Environmental Engineer  
Environmental Services

Enclosure

cc: Ms. Joanne Scanlon Prestia, Esq.  
Mr. Wesley McNealy

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