The Scope of Work (SOW) describes the specific tasks to be undertaken in the performance of a Remedial Investigation and Feasibility Study (RI/FS) at Pepco’s Benning Road facility (the Site). Pepco has agreed to perform the RI/FS pursuant to the Consent Decree. The Consent Decree documents an agreement between Pepco and the District of Columbia (District) which is part of the District’s larger effort to address contamination in and along the lower Anacostia River.

The 77-acre Site is bordered by a DPW Trash Transfer Station, Kenilworth Maintenance Yard (operated by NPS), the Anacostia River to the west, Benning Road to the south and residential areas to the east and south (across Benning Rd.). The general Site location is shown in Figure 1. A detailed Site map is provided as Figure 2. Most of the Site is comprised of the Benning Service Center, whose activities relate to construction, operation and maintenance of Pepco’s electric power transmission and distribution system.

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| The purpose of the RI/FS described herein is to (a) characterize environmental conditions at the Site and the adjacent segment of the Anacostia River, (b) investigate whether and to what extent past or current conditions at the Site have caused or contributed to contamination of the river, (c) assess current and potential risk to human health and environment posed by conditions in the river, and (d) develop and evaluate potential remedial actions.  |

The landside and waterside areas of investigation are depicted in Figure 2. The areas of investigation may be adjusted or expanded during the course of the RI as warranted based on the findings of the investigation. DDOE will use the results of the RI/FS to determine whether and to what extent remedial action is warranted and to select appropriate remedial actions. For organizations purposes, the SOW is divided into four tasks:

Task 1 – Community Relations;

Task 2 – Scoping and Preparation of Work Plans;

Task 3 – Remedial Investigation; and

Task 4 – Feasibility Study.

Under the task of Community Relations, Pepco will prepare a Community Involvement Plan (CIP) for review and approval by DDOE. The CIP will identify issues of potential community concern regarding the ongoing environmental activities being performed in and around the Site, and will outline community involvement activities to be undertaken. The plan will provide the framework for communicating information to the public about the RI/FS, and shall incorporate procedures for ensuring that members of the public are provided the opportunity to review and comment on the deliverables for at least 30 days prior to final approval by DDOE.

Scoping is the initial planning process for the RI/FS and it is continued and refined throughout the RI/FS project. Pepco will gather and analyze existing available data and information regarding past and present environmental conditions at the Site and in the adjacent segment of the Anacostia River. This information will be used to identify additional data needs and to develop a preliminary range of potential remedial alternatives. A preliminary list of documents to be analyzed are presented in Table 1. This list will be updated as additional information and results becomes available. This analysis will be used to prepare a Conceptual Site Model (CSM). The CSM will include sources of contamination, affected media, routes of migration, human and environmental receptors and routes of exposure. The CSM is useful in identifying further sampling needs and potential remedial technologies to mitigate any identified risks. A preliminary CSM will be included in the RI/FS Work Plan, but will be updated as more data becomes available through the RI/FS activities.

Pepco will perform a Remedial Investigation (RI) by implementing the Sampling and Analysis Plan (SAP) and related work plans with the overall objective characterizing conditions in soil, groundwater, surface water and sediment. The RI is broken up into two parts, the landside and the waterside investigations.

Based on the detailed review of Site history and prior environmental investigations pursuant to Task 2 (Scoping), the landside investigation will include collection and analysis of soil and groundwater samples at the Site to identify areas that have potential to contribute to surface water or sediment contamination. The areas to be sampled will include areas where historical PCB spills and cleanups occurred, areas where petroleum underground storage tanks (USTs) were removed, and current and historical PCB storage/handling buildings. The sampling effort will proceed in two phases to allow careful review and consideration of the findings of the initial contaminant delineation phase of work, followed by additional delineation and optimized risk evaluation. Phase 1 will involve advancing soil borings and Geoprobe sampling to screen the areas of potential concern and identify any continuing sources of contamination. Phase 2 will be a detailed hydrogeologic investigation involving the installation and monitoring of groundwater wells based on the Geoprobe and soil boring data collected in Phase 1. The sampling program will incorporate a progressive elimination approach that allows the use of screening parameters to screen larger areas to help focus resources on potential problem areas.

The waterside investigation will be conducted in two primary phases of field work. Data collected during the first phase of work will be used to refine the scope and nature of work for Phase 2. In general, Phase 1 of the waterside investigation will focus on defining the nature and extent of constituents of potential concern in sediments adjacent to the Site and selected background locations. Following the evaluation of Phase 1 findings, Phase 2 will be implemented to refine delineation of chemical data, and add toxicological, benthic, and geotechnical information from selected portions of the study area. Pepco will also incorporate a progressive elimination approach into the waterside sampling program. This approach allows the use of screening parameters to screen larger areas of concern.

Pepco will conduct a Feasibility Study (FS) based on the results of the RI. The objectives of the FS are to (a) identify remediation requirements and establish cleanup levels as necessary to eliminate or prevent unacceptable risks to human health and the environment, and (b) identify, screen and evaluate potential remedial alternatives. Pepco will conduct a detailed analysis of the alternatives that have been assembled and retained. This analysis will consist of an individual evaluation of each alternative against the following evaluation criteria and a comparative evaluation of all options against the evaluation criteria [(i) Overall protection of human health and the environment (ii) Compliance with applicable regulations (iii) Long-term effectiveness (iv) Reduction of toxicity, mobility, or volume through treatment (v) Short-term effectiveness (vi) Implementability (vii) Cost (viii) DDOE acceptance and (ix) Community acceptance]. The FS Report is subject to review and approval by DDOE and will be open for public comment.