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| seal | COAST GUARD YARD**SUPERFUND UPDATE****BULLETIN** |  |
| VOLUME: 9  NUMBER: 1 | **DEPARTMENT OF HOMELAND SECURITY** **U. S. COAST GUARD YARD** | DATE: 8 October 2010  ORIGIN: fm-900 |

This bulletin is part of our ongoing effort to provide you with the latest Superfund-related information at the U.S. Coast Guard Yard (Yard). Our goal is to facilitate open communication with members of the community and our employees regarding the Yard’s listing on the U. S. Environmental Protection Agency’s (EPA) National Priorities List (NPL). The Yard was finalized as a Superfund site in 2002. The areas of interest in the Yard’s Superfund initiative are ones of historical contamination at the 111-year-old shipyard, not a result of current-day business practices.

**Site #1 (Drydock Sediments)-Yard Clears First Superfund Site:**

On September 28, 2007, the EPA, Region III, and the Yard signed a Record of Decision. With concurrence from the Maryland Department of the Environment (MDE), the document officially records the environmental closure of Site 1 which consisted of sediments under the shipways and old dry dock locations. Through completion of a Remedial Investigation (RI) and Human Health and Ecological Risk Assessment, it was determined that no action was required.

**Site #4 & #7 Remedial Investigation and Removal Action:** Because of their proximity and similar operational histories, Site #4 (Salvage Lot) and Site #7 (Former Burn Pit) were investigated together resulting in a final RI report dated August 2006. This report identified the potentially contaminated areas at Sites #4 and #7 and the nature and extent of contamination in these areas.

During February 2007, an Engineering Evaluation/Cost Analysis (EE/CA) for Site #4, the former Salvage Lot, was prepared. The EE/CA describes the proposed remedial action alternatives for the site, including costs, and compares the pros and cons of each. With concurrent review of the EE/CA by the EPA and the MDE, the Yard prepared a draft Removal Action Work Plan in May 2007 that was approved by the EPA and MDE and includes specifications, statement of work, and contracting procedures. The removal action at the former Salvage Lot began on November 12, 2007 and concluded on March 31, 2008. Soils contaminated with lead and polychlorinated biphenyls (PCBs) from historical operations were removed and transported to regulated disposal facilities. Additional sampling was conducted after the soil removal operations to ensure contaminated soils were removed. The sampling confirmed the removal of contaminated soils. The removal was conducted to stringent residential standards, the most conservative regulatory standard. Removal of contaminated soils to this level permits unrestricted future use of the property. The Yard completed the process of officially closing Site 4 with a Record of Decision being signed on May 6, 2009 by the Yard and EPA with the concurrence of MDE.

At Site #7, the Final Feasibility Study (FS) was sent to EPA and MDE during November 2008 and subsequently approved for implementation. A Proposed Remedial Action Plan (PRAP) was prepared concurrently with the FS. The public meeting to discuss the PRAP was held March 3, 2009. The proposed remedy is to conduct a removal action similar to Site 4. On April 1, 2009, a presentation regarding the upcoming activities was provided to all-hands working in Buildings 30 and 37. The removal action began on June 29, 2009. In addition to the removal action, the limited groundwater contamination was addressed with the removal of the primary source of the contamination which is soils and waste debris. In addition, during April 2009, an oxygen-release compound was injected into the groundwater to enhance the bioremediation of the contamination. The excavation work on the project to the rear of Buildings 30 and 37 and the removal of all accessible contaminated soils were completed during December 2009. For this portion of the project, 364,000 gallons of groundwater were treated and over 6,650 cubic yards of contaminated soil and waste debris were removed. Restoration of the majority of this area is anticipated to be completed by late October 2010. The Record of Decision for the activity at this site was signed on September 30, 2009 by the Yard and EPA with the concurrence of MDE.

Work to address the portion of the burn pit between Buildings 37, 35 and 36 began the week of March 29, 2010. Approximately 6,450 cubic yards of contaminated soil were removed. The removal of all accessible contaminated soils was completed on June 10, 2010. Construction of replacement infrastructure is anticipated to be completed by the middle of December, 2010.

**Sites #8 & #9 Remedial Investigations:** During 2008 and 2009, the Yard completed all required field work for the RI. The Draft RI for Site #9 was sent to the EPA and MDE for their review and comments during the week of February 9, 2009. Their comments have been received and were addressed. The Draft RI Reports for Site #9 was sent to the EPA and MDE for their review and comments on July 9, 2009. The final RIs for Sites #8 & #9 were published during January 2010.

A Draft Engineering Evaluation/Cost Analysis (EE/CA) for Sites #8 & #9 was sent to EPA and MDE for their review and comment during February 2010. MDE has approved the EE/CA; the Yard has received EPA comments and sent the revised EE/CA to the regulatory agencies on April 2, 2010.

The removal action at Site 8 began on June 3, 2010. Removal of contaminated soils was completed on June 15, 2010. The 4,400 tons of non-hazardous waste was removed from Site 8. Polynuclear Aromatic Hydrocarbons (PAHs) were the primary constituent of concern at Site #8. Sampling conducted on the sides and bottom of the excavated areas at Site 8 confirm the removal of PAHs below project action levels. Based on the success of the removal action, the Yard will begin the process of officially closing Site 8, seeking a Record of Decision of “no-action” from EPA with the concurrence of MDE.

The mobilization of equipment to Site 9 for the removal action began on June 21, 2010. To date, 8,300 tons of contaminated soils have been removed with lead as the contaminant of concern. Waste at Site 9 has exceeded estimates established during the investigative process. The waste is both deeper (up to 8 feet deeper) and wider (under Waesche Ave.) in two areas. Activities at the site were temporarily curtailed on September 3, 2010 pending additional FY 10 funding. Remediation activities are anticipated to resume in October 2010. This phase of the project will remove all hazardous waste north of the large concrete anchors beneath the lot which holds the waterfront bulkhead in place. We are currently in the process of securing FY11 funding to complete the removal of the remaining waste located in the 40 foot area between the concrete anchors and the bulkhead. If this funding is secured, we anticipate finishing the land based portion of the Site 9 project in FY 11.

Sediment sampling was conducted in 2008 to characterize the nature and extent of the contaminants in Arundel Cove adjacent to Site 9. The bulkhead that physically separates the waste in Site 9 from Arundel Cove had previously failed, allowing some contaminates to reach Arundel Cove. The Yard made repairs to the bulkhead during 2009. At the request of EPA and MDE, additional sediment sampling was conducted in March 2010. In order to keep the Site #9 RI project progressing, the Arundel Cove sediment sampling/dredging portion of the project is being tracked separately. During June 2010, the Yard and EPA agreed on the plan for dredging. During July 2010, however, additional areas of the bulkhead were observed to have failed. Dredging will now be delayed until the final remedy is in place for the land based portion of Site 9. This is necessary since the possible transport of contaminants through the bulkhead must be curtailed prior to the dredging of Arundel Cove.

**Sites #5, #6, #11 and #13 Work Plans and Status:** Work Plans (WPs) for Site #5, the former Creosote Stained Soil area; Site #6, the Cosmoline area; Site #11, the Grit Blast area, and Site #13, the area of the former Acid Tanks, are completed and approved by the EPA and MDE. The WPs detail all aspects of sampling and analysis of the sediment and groundwater at the sites. All work detailed in the WP has been completed and all data generated has been received. Sites #5, #6, #11 & #13 were originally listed as part of the Superfund site due to elevated levels of arsenic detected in early sampling. In later sampling for the Background Sampling Report discussed below, it was determined that the region has elevated levels of arsenic, not just the sites at the Yard that were sampled. For this reason, EPA and MDE have concurred to have Sites #5, #6, #11 & #13 listed as “Areas of Concern” (AOC) rather than “Operable Units.” This terminology is an administrative function only and does not have any effect on the investigative or cleanup aspects of the Superfund process. A preliminary evaluation of all data recommended no further action for these areas. A Site Inspection (SI) was prepared and sent to EPA and MDE for review during January 2010. During the last week of June, the EPA and MDE concurred with the SI and its recommendation of no further action.

**Background Sampling Report:** After resolution of final comments, the Background Sampling Report was prepared and distributed in April 2006. The report identified the background levels of soil, sediment, and surface water contamination in the area. The Yard determined that background concentrations reflected decades of industrial activities in the surrounding south Baltimore area. The samples at the various potentially contaminated sites at the Yard were compared to the background samples. The accuracy and appropriate application of the background sampling were scrutinized and reviewed by members of the technical partnering team, including the EPA and MDE. The Background Sampling Report will remain an important tool for the investigation and clean-up of the various sites at the Yard to distinguish contamination likely originating from Yard activities from other industrial/commercial sources.

**Technical Partnering Meetings and Conference Calls**: The most recent technical partnering meetings were held on November 10, 2009 and April 27, 2010 at the Yard and on December 16, 2009 at EPA Region III Headquarters in Philadelphia. The most recent Partnering conference call was held on September 28, 2010 to discuss site-related progress and documents. There was a Partnering conference call on May 4, 2010 to discuss Site 9 dredging. The next technical partnering meeting is scheduled for October 19, 2010 at the Yard.

**Federal Facilities Agreement (FFA):** The Yard has completed a Federal Facilities Agreement (FFA) in cooperation with EPA Region III. The FFA is an agreement between the federal property owner (in our case, the Yard) and the EPA. The FFA defines roles and responsibilities, priorities, and potential penalties during a federal NPL site clean-up process. The FFA was finalized with the last signature on September 11, 2008.

**Site Management Plan (SMP):** Approval for the revised SMP has been received by both MDE and EPA. The SMP meets the requirements of the Federal Facilities Agreement. The purpose of the SMP is to provide a management tool for the Yard, EPA, MDE and our consultants in planning, scheduling, and setting priorities for environmental remedial response activities at the Yard.

**ISO 14001**: The Yard conducted its ISO 14001 Environmental Management System (EMS) Audit on June 8 and 9, 2010. Some comments were provided, but no minor non-conformities or major non-conformities were cited. In the ten years the Yard has maintained its ISO 14001 EMS Certification, this is the first audit with no non-conformities found. The audit was conducted by ABS Quality Evaluations (ABS QE). ABS QE is accredited by ANSI-ASQ National Accreditation Board (ANAB). ANAB is the primary accreditation body for EMS in the United States. The Yard’s ISO 14001 program receives an external surveillance audit annually, with a recertification audit every three years. The environmental staff at the Yard conducts monthly internal environmental audits of various programs, shops, departments, and buildings. The next EMS Audit is scheduled for June, 2011.

**Community Advisory Group (CAG) Meeting**: The next CAG meeting will be held on Tuesday, October 19, 2010 at 7 p.m. in Building 27 at the Yard, Baltimore, Maryland 21226. The CAG meetings are for all interested citizens, local business leaders, and Yard employees to attend.

**Communications**: Questions or concerns regarding the Yard’s Superfund-related activities are always welcome and can be directed to Ms. Dottie Mitchell, the Yard’s Communications Manager, at 410-636-7238 or [dottie.e.mitchell@uscg.mil](mailto:dottie.e.mitchell@uscg.mil) . The Yard’s mailing address is: Communications Office, Yard, 2401 Hawkins Point Road, Baltimore, Maryland 21226. All final documents related to the Yard’s Superfund designation are available at the Yard’s repositories in the North County Library located at 1010 Eastway, Glen Burnie, Maryland and the Brooklyn Park Library located at 1 East 11th Avenue, Baltimore, Maryland. Additional information about the Yard’s Superfund activities can be found on the Yard’s website: [www.uscg.mil/yard](http://www.uscg.mil/yard)

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