Summary of Meeting Notes – 20 November 2020

Participants
Barbara Brown – Maryland Department of the Environment (MDE)
Nancy Czapek – Public Building Reform Board (PBRB)
Paul Walden – PBRB
Tim Sheckler – General Services Administration (GSA)
Chafula Abdullah - GSA

The context of this discussion was to review the summary of prior testing that had been done, and discuss what additional required testing would be necessary to pursue No Further Action determination from MDE

- Review of prior studies indicates that nearly all detected contaminants are below 2018 residential screening values.

- Soil gas samples for volatile organic compounds (VOCs) should be taken at 5-6ft depth at 5 locations in the vicinity of the former fueling pad, berm area, propellant handling building, former machine shop / missile assembly building, and portions of the southern property boundary. MDE concurred with the soil gas sampling locations on the attached map.

- At each of the 5 soil gas sampling locations, samples should be taken and tested for total chromium. The soil samples may be collected during the installation of the soil gas probes. For the two sample locations with the highest total chromium values, those samples should also be tested for hexavalent chromium.

- For existing buildings with exterior lead paint, soils samples should be taken in the soil immediately adjacent to the structure and tested for total lead content. Samples should be taken at reasonable intervals around the affected structures.

- Any final determination of No Further Action for residential use (either Tier 1A or Tier 1B) will be dependent on a site-specific design plan by the new owner.

⊙ PROPOSED LOCATIONS FOR VOC/CHROMIUM SAMPLING

N

Figure 2

Building Locations

Former Nike Battery W-92
Gaithersburg, MD

April 2008

M07125

ARM Group Inc.
Earth Resource Engineers and Consultants
8965 Guilford Road ▪ Suite 100
Columbia, MD 21046 ▪ Phone: (410) 290-7775

Tim Sheckler - WPXU <tim.sheckler@gsa.gov>

Re: Summary of Key Points - 20 Nov 2020 Discussion - Gaithersburg Nike Site

barbara.brown1 <barbara.brown1@maryland.gov> Mon, Dec 14, 2020 at 7:40 AM
To: Tim Sheckler - WPXU <tim.sheckler@gsa.gov>
Cc: "Nancy Czapek (PTZA)" <nancy.czapek@pbrb.gov>, Paul Walden <paul.walden@pbrb.gov>, Chafula Abdullah - WPXU <chafula.abdullah@gsa.gov>

HI Tim

Sorry for delay-the soil gas sampling locations are acceptable.

On Wed, Dec 9, 2020 at 10:44 AM Tim Sheckler - WPXU <tim.sheckler@gsa.gov> wrote:
Thanks for the clarification! We look forward to hearing back from you on the sampling locations.

Cheers,
!Tim Sheckler!

On Wed, Dec 9, 2020 at 10:39 AM Barbara Brown -MDE- <barbara.brown1@maryland.gov> wrote:
Correct...

On Wed, Dec 9, 2020 at 10:13 AM Tim Sheckler - WPXU <tim.sheckler@gsa.gov> wrote:
Ah - got it. So you take 5 total samples, test for total chromium at each one, and the two locations with the highest total chromium, you also test for hexavalent chromium, correct?

On Wed, Dec 9, 2020 at 9:39 AM Barbara Brown -MDE- <barbara.brown1@maryland.gov> wrote:
Hi Tim

You do not have to sample all five soil samples for hexavalent chromium-just the two highest total chromium samples...

On Wed, Dec 9, 2020 at 9:36 AM Tim Sheckler - WPXU <tim.sheckler@gsa.gov> wrote:
Barbara,

Thanks for looking at the map.

Re: your chromium comment - not sure what you mean there. Can you elaborate a bit more?

Cheers,

Tim Sheckler

On Wed, Dec 9, 2020 at 7:22 AM Barbara Brown -MDE- <barbara.brown1@maryland.gov> wrote:
Hello Tim

Would agree-except you only need two samples of the highest total chromium for hex chromium...
I will look at the sample map and let you know today if I have any recommended changes...

On Tue, Dec 8, 2020 at 5:52 PM Tim Sheckler - WPXU <tim.sheckler@gsa.gov> wrote:
Barbara,

Good afternoon. Hope you had a nice Thanksgiving break. I wanted to follow up on the note I sent right before Thanksgiving summarizing the conversation we had on 20 Nov 2020. Please let us know if you are in agreement with the key points and sampling locations, or advise with any comments / additions you may have. We look forward to hearing from you.

Cheers,

Tim Sheckler
---------- Forwarded message ---------
From: **Tim Sheckler - WPXU** <tim.sheckler@gsa.gov>
Date: Tue, Nov 24, 2020 at 1:31 PM
Subject: Summary of Key Points - 20 Nov 2020 Discussion - Gaithersburg Nike Site
To: <barbara.brown1@maryland.gov>
Cc: Nancy Czapek (PTZA) <nancy.czapek@pbrb.gov>, <paul.walden@pbrb.gov>, chafula.abdullah@gsa.gov <chafula.abdullah@gsa.gov>

Barbara,

Good afternoon. We wanted to again thank you for your time last Friday. Based on the discussion, I prepared a summary of the key points from the meetings, and attached a proposed list of sampling locations based on our discussion. Please let us know if you are in agreement with the key points and sampling locations, or advise with any comments / additions you may have.

Have a Happy Thanksgiving!

Cheers,

November 9, 2020

ELECTRONIC DELIVERY

Tim Sheckler, Director Real Property Utilization and Division
U.S. General Services Administration
1800 F. Street, NW
Washington, DC 20405

Re: File Review and Recommendations for Additional Sampling
Gaithersburg NIKE Site
770 Muddy Branch Road
Gaithersburg, Maryland 20878
BMI: MD 0226

Dear Mr. Sheckler:

Pursuant to your August 26, 2020 request, the Land Restoration Program ("LRP") of the Maryland Department of the Environment ("MDE") has reviewed the documents accompanying your request, as well as supplemental information contained in our files, for the Gaithersburg NIKE Site located at 770 Muddy Branch Road ("the Property"), in Gaithersburg, Maryland. Among the documents reviewed were 2007 and 2008 investigation reports prepared by ARM Group, Inc. ("ARM"), a June 2008 Demolition and Remediation Assessment Report prepared by ARM, and an April 2012 Site Inspection Report prepared by the LRP. We understand that you are seeking our regulatory perspective on the environmental condition of the Property as determined from the document review. Specifically, you are interested to know if we consider the Property suitable for residential use, or if further investigation would be needed to make this determination. This letter serves to summarize our findings. Regarding further site testing, the LRP recommends the following sampling program to supplement the site characterization phase of the project:

1. Collection of at least five (5) deep (5-6 feet) soil gas samples for volatile organic compounds in the vicinity of the former fueling pad, berm area, propellant handling building, former machine shop/missile assembly building and portions of the southern property boundary within the sampling area as shown on the attached Figure 1.

2. Collection of surface and subsurface soil samples for total and hexavalent chromium content. Soil samples may be collected during the installation of the soil gas probes.

3. Performance of a lead paint evaluation of the existing structures. If lead paint is identified on the exterior of a building, the surrounding soil should be tested for lead to check for impacts from flaking paint.

Although the recommended additional sampling will address current data gaps a final evaluation for suitability for residential use with a No Further Action determination by the LRP would require GSA or a future owner address the following issues:

1. The documents reviewed did not contain information about the current environmental condition of Property and/or impacts that the current occupant's on-going activities could have on the current condition.

2. We have no confirmation that the hazardous building materials noted in the Demolition and Remediation Assessment Report and the hazardous materials contained in the missile silos have been removed and properly disposed of.

3. We have seen no information about the proposed residential development for the Property, including, but not limited to, the nature and location of the residential units, future grade changes and demolition plans for the existing buildings and missile silos. For your information, a copy of the LRP's factsheet on residential development requirements is provided with this letter.

For your information, MDE's review of the available information for the Property was in accordance with our statutory and regulatory authority on behalf of the public at large in seeking to protect public health and safety, as well as the natural resources of the State from contamination by pollutants, and not for the benefit of any specific group. As always, this letter should not be construed as a waiver or limitation of MDE's right to take enforcement or other action with respect to activities not addressed herein or unknown to MDE at this time, including newly discovered contamination or the exacerbation of existing contamination. MDE and the State of Maryland retain all authority and rights against any persons in any way responsible for causing the contamination present at or migrating from the site, including the right to seek all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, resulting from the release of any contaminant at the site. If you have any questions regarding this letter or other aspects of the LRP program please contact me at (410) 537-3212 or via email at barbara.brown1@maryland.gov.

Sincerely,
Barbara Brown
Barbara Brown, Section Head
State Assessment and Remediation Division

Enclosures

Figure 1 Soil Gas Sampling Area

Soil Gas Sampling Area