# COMMUNITY HEALTH AND WELFARE PLAN
# HIDDEN LANE LANDFILL SUPERFUND SITE OPERABLE UNIT 3
# STERLING, VIRGINIA

**REVISION 0**

*Prepared for*

**U.S. ENVIRONMENTAL PROTECTION AGENCY**
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# 1.0 INTRODUCTION

This Community Health and Welfare Plan (CHAWP) has been written by the United States Environmental Protection Agency (EPA) to describe the cleanup plan for the Hidden Lane Landfill Superfund Site (Site), the potential risks that implementation of the cleanup plan could pose to the community and how those risks will be managed by EPA. It has been written using known information about the waste and chemicals at the Site, and about the possible risks and concerns from the future cleanup work. Should the work, the site conditions, or the concerns change, or if new information becomes available, this CHAWP will be updated or amended.

## 1.1 GOALS OF THE CHAWP

This plan describes the steps of the cleanup, looks at the potential concerns or hazards from this cleanup, and describes the methods that will be used to protect the community. One goal of this plan is to provide clear, easily understood, and easily accessible safety information to the public. It includes information on how the community will be informed about the cleanup work and how community members can contact the EPA if there are comments, questions, or concerns.

The CHAWP focuses on the safety and welfare of the public near the work site. Additional onsite Health and Safety Plans (HASPs) that address worker safety will be written by the EPA contractor(s) performing the cleanup work.

Generally, EPA follows this basic approach when developing a CHAWP:

- First, identify possible hazards and community health, safety, and welfare concerns that could arise during work activities.
- Second, look at safety procedures that will be put in place before the project begins and during the work, to decrease possible hazards and impacts.
- Third, develop procedures to mitigate adverse impacts on the community if an unexpected event occurs.
- Finally, monitor cleanup activities, implement safety procedures, and modify procedures, as needed, during site activities to address any issues that arise before they cause impacts on the community. During this phase, EPA will both document procedural changes in the CHAWP and then implement those additional procedures and best practices to ensure the project remains safe both on site for workers and off site in the community.

Copies of this CHAWP will be made available to the public on the website (www.epa.gov/superfund/hiddenlane) and, at the EPA Command Post and at the Cascades Library in Potomac Falls, Virginia.

This CHAWP is intended to be a 'living document" that can be updated, as necessary.

## 1.2 SITE DESCRIPTION AND BACKGROUND INFORMATION

### 1.2.1 Location of the Site

The Site is privately owned and is located approximately ¾ mile north of Route 7 near the intersection of Route 28 in Sterling, Loudoun County, Virginia. The landfill is no longer active and consists of a covered/capped soil mound with vegetative cover. The landfill is approximately 50-feet (ft) high, 400-ft wide, by 2,000-ft long.

### 1.2.2 Description of the Site

The Site is situated in a residential area. Countryside subdivision is a high-density residential community located to the east and south of the Site. Countryside is serviced by public water and sewer connections, and most homes have basements or crawl spaces. The sanitary sewer easement transects the Site property (north of the landfill) and runs perpendicular to the landfill. The Broad Run Farms community is an older, less dense residential community located to the west and northwest of the Site. These homes are connected to the public sewer; however, they receive their potable water from individual domestic water wells. Most homes in Broad Run Farms have basements or crawl spaces. Additional residential homes in Broad Run Farms are located approximately 1,500 ft northwest of the landfill on Youngs Cliff Road.

The landfill mound is located approximately 2,000 feet south of the edge of the Potomac River. This area between landfill and River is characterized as undeveloped wooded land in the Potomac River floodplain.

A general site layout plan for the RA can be found on Figure 1 of Appendix A. It is important to note that as the project cleanup progresses, the site layout will be subject to change. This CHAWP document will be updated accordingly with the most recent version of the site layout figure.

### 1.2.3 Site History

The Site was originally part of 147.18 acres of undeveloped wooded land owned by private citizens. Starting in 1971, the facility accepted a variety of solid wastes including construction and demolition wastes. The landfill was closed in 1986 by order of the Commonwealth of Virginia, pursuant to a 1983 Loudoun Circuit Court Order. As part of the close-out procedures, the landfill was covered with a two-foot clay cap. In the mid-1990s additional material, consisting primarily of soil, stone, and concrete rubble, was deposited on portions of the landfill in an effort by the landowner to fill sink holes and conduct post-closure maintenance.

VADEQ and EPA had led numerous environmental investigations at the Site since the mid-1980s including a preliminary assessment and site inspection which resulted in the Site being listed to EPA's National Priorities List on March 19, 2008. Remedial Investigation activities began in 2009 and the Feasibility Study began in 2016. In 2019, EPA conducted a Supplemental RI with the objectives of locating the TCE source area within the landfill footprint, characterizing the magnitude and extent of the source area contamination, and generating data to identify transport mechanisms associated with the migration of TCE from the source area into the bedrock aquifer. Several assessments were conducted to narrow the potential investigation area, including an extensive evaluation of geophysical and hydro-stratigraphic data as well as a thorough review of historical photographs to identify past operational areas of the landfill. Subsequent tree core sampling, direct sensing by membrane interface probe and hydraulic profiling tool (MIHPT), and direct push sampling were used to identify, characterize, and delineate a source of TCE in soil within the landfill footprint. The TCE source area was found at the southern end of the landfill footprint within the soil overburden and saprolite, and in shallow bedrock. A Record of Decision (ROD) for OU-3 was issued in February 2022 to address the landfill cap and TCE source of Site groundwater contamination. EPA is addressing TCE contamination in residential drinking water wells as part of OU-2 via installation of, and connections to, a public waterline. EPA expects the future ROD for OU-1 to identify the final RA for the Site, which will focus on Site-wide groundwater contamination.

#### 1.2.3.2 Current and Future Land Uses

As part of the RA for OU-3, the landfill cap will be repaired to ensure the landfill property is not a source of ongoing groundwater contamination in the area. No intended use (i.e., development) has been identified for the landfill confines at this time. EPA will work with any future development plans to ensure it does not interfere with any component of EPA's cleanup plans.

# 2.0 PROJECT SUMMARY AND CLEANUP PLAN

## 2.1 OVERVIEW AND DESCRIPTION OF THE CLEANUP PLAN

The overall goals for the cleanup are to protect the long-term integrity of the landfill cap and remove or control the source of contamination. This RA will reduce the amount of contamination reaching groundwater by physical removal of contaminated soils to reduce mass and concentration of the source area contaminants, and by minimizing infiltration of precipitation into the landfill and to reduce mass and concentration of the source area contaminants. To achieve these goals, EPA designated the landfill at the Site as a Waste Management Area. Thus, EPA uses the edge of the Waste Management Area to determine the point of compliance to assess whether groundwater cleanup standards have been achieved. To achieve a substantial decrease in TCE concentrations downgradient of the Waste Management Area and to ensure offsite concentrations remain below EPA health protective water criteria known as Maximum Contaminant Levels, or MCLs, *Remedial Goals* (RGs) have been established for source area soils. For the TCE source area, the RG is to remove all soil in this source area down to bedrock (i.e., overburden soil) where TCE contamination is above 25 milligrams of TCE per kilogram of soil (25 mg/Kg). Soil TCE concentrations in the source area are up to 25,000 mg/kg. Removal followed by treatment of TCE between 25-25,000 mg/kg in soil within the source area is expected to substantially decrease the total contaminant mass at the Site and result in a substantial decrease in downgradient groundwater concentrations. The cleanup will be conducted in two phases: 1) Excavation and off-site disposal of source area material and 2) In situ bioremediation and chemical reduction to further remediate the groundwater. The second phase will be designed and conducted after the excavation phase is completed. This document focuses primarily on the first phase and will be updated before the second phase begins.

## 2.2 STEPS OF THE CLEANUP PLAN

Below are the steps that will be included in the cleanup plan. Where applicable, start and completion dates for each activity are included:

1. EPA and its contractors will mobilize to the site to construct an access road, conduct limited tree removal (as needed) and construct a temporary site operations facility (command post, lavatories, equipment trailers, etc.). Anticipated mobilization to occur in December 2023.

2. Soil excavation of the TCE source area (an area approximately 100-feet wide by 50-feet long by 35-feet deep, located south of the landfill mound) is expected to start in late January 2024. Machinery to be used will include bulldozers, excavators, backhoes, dump trucks, and other heavy equipment.

3. Excavated material will be stockpiled onsite in areas designated as reuse soil and disposal soil. The approximate top five (5) feet of soil is not TCE-contaminated. This soil will be reused in the same area once excavation is complete. The remainder of the soil excavated from depths more than 5

feet below ground surface will be loaded directly onto transport trucks for offsite disposal (i.e., live-loading) or temporarily stockpiled and transported to an appropriate waste disposal facility. If groundwater is encountered in the excavation pit, it will be dewatered and treated onsite through a temporary treatment system.

4. Storm water management and erosion controls will be installed around planned excavation and stockpile areas.
5. Once excavation is complete, clean soil will be delivered to the site to backfill the excavation area. The soil will be placed within the excavation area and compacted in increments suitable to the Site workplan.
6. The planned excavation area will be restored to original grade and EPA and its contractors will reseed and install erosion control mat in the area.
7. As part of the overall landfill cap repair, EPA will address several known areas on the landfill cap where depressions, sink holes, low spots and erosion have been identified.
8. The EPA will monitor the performance of all the parts of the cleanup and perform routine maintenance and repairs as needed.

# 3.0 POTENTIAL HEALTH RISKS, HAZARDS DURING CLEANUP ACTIVITIES

This section describes in general the potential health risks, physical hazards and nuisances that could occur during the Hidden Lane Landfill RA cleanup process as well as the approaches and procedures that will be used to address them. This section also includes the concerns that the community expressed related to the activities that will be performed as part of the landfill cleanup. As discussed earlier, the CHAWP is a living document and will be updated as site conditions change.

A critical part of this CHAWP is educating and communicating with community members, as their safety and welfare is the focus of this plan. Community members and residents must understand how this plan was developed, what steps will be taken to protect their health and welfare during the cleanup and how they can stay informed about cleanup progress and the safety measures in place. Section 5.0 of this CHAWP discusses this aspect of the plan in detail.

## 3.1 EXPOSURE TO CONTAMINANTS

EPA recognizes that exposure to landfill and cleanup-related contaminants during this project is a concern in the community. TCE-contaminated soil and wastes will be addressed in the RA. Excavation, surface grading, and handling of exposed waste and/or contaminated soil (including stockpiling and trucking off site) are all activities that create the potential for exposure if the materials are not managed properly or contingency plans are not developed and implemented during emergencies.

The main ways that community member exposures to landfill contaminants could occur during this RA include:

- Dust generation and transport offsite during excavation, stockpiling, and transportation.
- Citizens trespassing in work areas and contacting exposed waste or contaminated soil.
- Contaminated water, soil, or sediment migration offsite, including through the nearby drainage swale where residents may then come into contact with contamination.
- Construction and dump truck vehicle accidents on neighborhood streets that result in the spill or release of contaminated materials or fuel oil.

Less likely ways that could create the potential for exposure to landfill contaminants and/or physical hazards include:

- Failure of erosion and sediment controls in place while working at the RA excavation area which could allow for large scale erosion of construction materials, the stockpile or landfill contents into the adjacent creeks and further downstream; and,
- Encountering and rupturing or buried drums, cylinders, etc. that could release chemicals into the air, land, or water.

### 3.1.1 Planning for and Addressing Potential Exposure to Contaminants

Human exposure to contaminants can happen when a chemical is present in a media (soil, water, or air) and a person encounters one of those media, e.g., touching, eating, drinking, breathing. How a person's health is affected by environmental contaminant exposures is based on the nature of the chemicals, the amount of chemical that is present in the environmental media, how often and for how long a person is in contact with the contaminated media, and personal factors, such as medical conditions, genetics, and lifestyle choices. The presence of waste and contaminants on or in the landfill does not mean that residents are being exposed. Preventing contact with contamination will ensure no health impacts from the chemicals will occur in the community. There are several ways presented in the following sections that the EPA is planning to prevent exposure to contamination during and after the cleanup work at the landfill. These measure and approaches will be updated as necessary throughout the cleanup process and communicated to the nearby residents and other stakeholders.

#### 3.1.1.a Waste and Contaminated Soil Excavation and Handling

As discussed above, a main part of this cleanup project includes excavation and reuse of clean soil and offsite disposal of TCE-contaminated soil. Approximately one tenth of an acre (100-foot by 50-foot) will be excavated as part of this RA. The top 5 feet of soil in the excavation area will be stockpiled separately from the TCE-contaminated soils located deeper in the ground. The TCE-contaminated soil will be live-loaded or stockpiled and removed from the site for disposal at a proper disposal facility.

The following approaches will be used to protect the community during these activities:

- Three Work Zones will be established that include the Support Zone, Contaminant Reduction Zone, and Exclusion Zone. The purposes of the Work Zones are to make sure that contamination stays within the contaminated areas and does not get transported into non-contaminated areas, as well as preventing unauthorized access of workers or residents into areas that could result in unhealthy exposures or physical injuries.
    - Administrative, clerical and site management activities, site visitors, and other support functions are based in the support zone. Surveys of support zone work areas will be conducted as needed to make sure that this zone remains uncontaminated and safe for occupation. If contamination or unsafe contaminant concentrations are detected in the support zone, zone boundaries shall be adjusted until corrective steps are taken and survey results indicate that this zone is again uncontaminated and safe for use.
    - Each restricted area will have associated control point(s), allowing access to the restricted area. These control points are designated as contamination reduction zones to ensure that the rest of the Site and offsite areas remain uncontaminated. All instruments, tools, equipment,

and other items brought into a restricted area will be decontaminated prior to being released from the control point to ensure that contamination is not spread from the exclusion zones.

  - All personnel within the exclusion zone will at minimum wear safety toe boots, a high visibility safety vest, safety glasses, and a hard hat. Additional Personal Protective Equipment (PPE) requirements will be established in the HASP developed by the RA Contractor. All personnel entering the exclusion zone will work under the buddy system.
  - All the procedures and protocols for each of these zones will pertain to site workers, EPA staff, and any authorized site visitors. These procedures and protocols will be detailed in the HASP developed by the RA Contractor.

- Temporary fencing and warning/information signs will be placed around the site and construction staff spotters, traffic flaggers and/or other measures will be used in the active work areas, including offsite in the neighborhoods to make sure that equipment operators are aware of any nearby residents and to prevent residents from crossing into areas that are unsafe or unauthorized.

- Tarps or an equivalent material will be used to cover stockpiled materials and excavated soils to prevent dust, odors, and contaminated surface water from migrating on and off site. A Dust Control Plan will be developed prior to beginning excavation work.

- If visible dust is observed in or migrating from contaminated soil areas, dust suppression activities will be implemented, including using a water truck, hose or equivalent to wet the soil surface and roadways to prevent additional dust from being produced.

- Air monitoring for particulate matter downwind of excavation areas will occur for the duration of excavation activities in contaminated areas and at the discretion of the EPA Remedial Project Manager (RPM), currently Austin Oelschlager, or the EPA On-Scene Coordinator, currently Chuck Rapone.

- In addition to monitoring for visible dust production, respirable dust, including particulate matter less than 10 microns in diameter (i.e., PM10) and less than 2.5 microns in diameter (i.e., PM2.5) will be monitored by DustTRAK DRX Desktop Aerosol Monitor 8533 (DustTRAK) or equivalent for specific work tasks, e.g., excavation, that are determined to pose a potential for dust exposure or dust movement into residential areas. Dust monitors will be placed surrounding the work zone perimeter/site perimeter as required. Daily wind forecasts and local reported conditions from the Dulles Airport will be utilized to place dust monitors in the downwind locations as appropriate. At a minimum, DustTRAKs will be monitored intermittently throughout the workday. Following the conclusion of each workday, at a minimum, the DustTRAK data will be downloaded from each aerosol unit and a summary of the monitoring data will be emailed to the EPA personnel, Site Safety

Officer (SSO), and work supervisors to review dust control measures in place and to identify any potential issues with dust migration. Graphs depicting air monitoring data will be developed for each working day, reviewed by qualified by site personnel, and uploaded to the site website on a weekly basis. Additional information on how air quality data will be communicated with residents is discussed in Section 5.0.

- As part of the RA, an action level of 150 micrograms of PM10 per cubic meter ($\mu g/m^3$) over a 1-hour time weighted average (TWA) will be utilized as an "action level" for perimeter air monitoring during RA construction activities. Exposure to PM10 above 150 $\mu g/m^3$ for over 24 hours is considered "unhealthy" for sensitive groups of the community that may experience more serious health effects, per the National Ambient Air Quality Standards.

- Current TCE concentrations within the work area will be monitored via a photoionization detector (PID) located in the work zone at the Site during RA excavation activities. A correction factor for TCE of 0.54 (for a 10.6 electron volt [eV] PID lamp) (Honeywell 2020) will then be used to convert total volatile organic compound (VOC) vapor readings to a TCE-specific time-weighted average concentration. It is important to note that VOCs other than TCE (such as vehicle vapor emissions) can be detected by the PID; therefore, this approach assumes all detected vapors are TCE, which is the most protective approach to preventing unhealthy TCE vapor exposures. PID screenings will be completed when new activities are performed which may release TCE vapors and periodically throughout the workday from within the work area and along the site perimeter. Readings will be documented and included in the Site updates daily. It is not anticipated that TCE will be a migration issue for the surrounding community.

**TABLE 3-1**

**DUST ACTION LEVELS**

| Action Level | Monitoring Frequency | Action |
|---|---|---|
| 15-min TWA > 112.5 $\mu g/m^3$ (75% of Total Dust Action Limit) at Site Perimeter | Continuous | Evaluate dust source, implement additional dust suppression activities. Workers use Level D PPE. |
| 1-hour TWA > 150 $\mu g/m^3$ at Site Perimeter | Continuous | Stop work and implement dust suppression activities. Ensure resident doors and windows in vicinity are closed. Conduct work in Level C PPE. |

- Temporary erosion controls, like silt fence and silt socks, will be installed surrounding the RA work area to minimize the amount of stormwater that contacts contaminated soil in work area; prevent stormwater that has contacted contaminated areas from moving into clean areas, residential areas, or the nearby creeks; and minimize the amount of soil and/or sediment that may be eroded during storm events. An erosion and sediment control plan (E&SCP) is included in the final RA workplan and will be followed during all site activities to protect water resources and neighboring properties from contamination.

#### 3.1.1.b Hazardous Waste Management

Hazardous materials other than TCE may be found during the course of conducting excavation. Hazardous materials typically have high concentrations of one or more chemicals that can cause them to be toxic, corrosive, or explosive. These materials may be sensitive to movement, light or other materials (for example, water) and have to be handled in specific ways. If such hazardous wastes are found during the project, the RA contractor will follow strict procedures during hazardous waste activities which may include the following:

- Updating the Waste Management and Health and Safety Plans or equivalent prior to waste characterization, excavation and disposal;
- Determining the types of waste;
- Using proper waste management procedures when working with the hazardous materials (such as double packing in non-reactive barrels, storing in water, etc.);
- Sampling the waste to characterize its hazardous waste properties, if any, for storage and disposal;
- Identifying off-site facilities to dispose of the waste; and
- Excavating and disposing of the waste off-site, according to appropriate federal and state regulations.

Soil and/or dust may come to be located on residential streets due to vehicular traffic entering/exiting the work areas. This soil or dust should not be TCE-contaminated because any vehicles operating in the Exclusion Zone must pass through the Contaminant Reduction Zone and be decontaminated prior to entering the Support Zone and leaving the site. The RA Contractor will have a designated decontamination area for truck wheels to be sprayed before entering the roadway on Persimmon Lane. The decontamination water will be collected for treatment onsite. During RA activities, the RA Contractor may use a street sweeper to collect soil located on neighborhood streets that is related to the cleanup. The collected material from street sweeping will be placed into an appropriate container(s) and taken back to the Site for proper disposal. Storm drains will be blocked to trap and prevent any remaining soil from entering the drains.

#### 3.1.1.c Spill Prevention

Spills and leaks may occur during refueling operations, due to hydraulic equipment failure or construction vehicle accidents/failures. Spill response kits that contain sorbent materials, shovels and other tools/materials/equipment will be available during these activities to mitigate any spills at the fueling station, designated control points, or within construction areas. Only approved containers and portable tanks will be used for the storage and handling of combustible liquids. In the event of a spill or leak, site workers will notify their immediate supervisor and/or the SSO and take immediate action to contain the spill. Extra absorbent materials will be in the site storage area trailer.

#### 3.1.1.d Fire or Explosion

In the event of a fire or explosion, fire extinguishers will be located in clearly visible locations, including the command post, dress out trailer, fueling station, and in site vehicles. All employees working at the Site will receive training on the proper use of fire extinguishers. Fire extinguishers will be inspected monthly. Should a fire or explosion be greater than can be handled safely on-site with fire extinguishers, site workers will evacuate as outlined in the Site HASP and 911 will be contacted immediately. EPA will also work with 911 emergency responders to assist with notifying and/or evacuating residents who may be impacted by a nearby fire or explosion. A strict no smoking, matches, or open flame policy will be enforced and safety signs will be posted as a reminder to site workers and visitors.

### 3.2 STORMWATER MANAGEMENT CONTROLS

Storm water management and contingency planning for flood events are both EPA and community concerns. Both small and large precipitation events could cause erosion and runoff of contaminated waste and soils if the proper precautions are not in place. Large rain events, such as hurricanes, can subject portions of the work area to flooding. EPA will follow the Virginia Stormwater Management Act best practices during construction activities.

### 3.3 NOISE

Remedial activities and other parts of the cleanup plan will involve the use of heavy construction equipment such as bulldozers, backhoes, and other noisy equipment. Noisy activities on construction sites include the use of jackhammers, dump trucks and the dumping of their loads, cement mixers, cement cutters, electric saws, tamping machines and welding machines, as well as noise generated from hand tools such as chain saws, chippers, sledgehammers, and drills. The type of construction work to be conducted during the landfill cleanup will create some additional noise and depending upon the type and proximity to residents, appropriate steps to manage potential exposure to excessive noise levels may be necessary.

#### 3.3.1 Planning for and Addressing Noise

It may not always be possible to prevent excessive noise levels in nearby residential properties during

construction activities. Excessive noise is currently considered to be at or above 85 decibels, adjusted to human hearing (dBA). For reference, a typical vacuum cleaner emits a noise level of 80 dBA and a lawn mower emits on average 90 dBA. The RA contractor will make efforts to limit the effects of the project noise on the community and will limit, as best as possible, activities producing excessive noise to normal business hours. The nearest dwelling is approximately 400 feet from the work area, so noise is anticipated to be minimal during normal business hours. This CHAWP will be updated should additional steps be needed to address nuisance noise issues.

## 3.4 TRAFFIC

The current landfill main access road is located along Persimmon Lane, which is planned to be the main entry/exit area for the site. The exact locations will be determined by the RA contractor as the work site layout is developed. Over the course of the RA, which will potentially take 5-6 months, truckloads of clean soil will be brought to the site as backfill material. Additionally, many truckloads will also be exiting the site to dispose of the waste. Residents and businesses close to the Site will see increased truck traffic depending on their location as materials are brought to and taken from the site. There are physical hazards associated with increased vehicular and equipment traffic. Construction vehicles are large, increasing the risk of severe injuries. There are many young children in the nearby communities which creates the potential for unpredictable movement of pedestrians along the streets. Figure 1 of Appendix A shows the extent of disturbance as part of the source area cleanup. The hours of work and transportation activities, the marking of truck traffic patterns, installation of additional street signs, the addition of flagging personnel near site access points, and coordination with the community members to ensure all are educated on traffic plans is necessary to minimize the risk of injuries due to vehicles. Wear and tear on residential streets, including Persimmon Lane, will be evaluated during activities, and coordination with appropriate government agencies will take place to ensure streets remain safe for public use and damages are promptly repaired.

### 3.4.1 Planning for and Addressing Traffic

A temporary change or increase in traffic may occur because of the work being conducted on the site, but the EPA and the RA contractor will make every effort to minimize these impacts. Pre-designated traffic routes will be identified as site plans are developed.

The EPA and the RA contractor will take the following steps to help limit traffic issues:

- Coordinate with the Loudoun County, Virginia Department of Transportation (VDOT) and the Loudoun County Public Schools to determine the best approaches and tools that can be used to address traffic concerns, e.g., installation of additional “Children at Play” signs along construction traffic ways.
- All personnel that operate vehicles will have a valid driver’s license for the type of vehicle they operate. Trucks will obey all transportation rules related to hazardous waste and other transport activities. All

traffic rules, regulations, and control signs will be obeyed at all times;

- Work areas will be clearly barricaded, and the appropriate signs will be displayed to protect workers and residents;
- Spotters will be used to guide the operator of a vehicle when backing up and in other situations where the driver has limited visibility;
- Personnel working near roadways or directing traffic will remain aware of their position in relation to traffic and will wear high visibility clothing and use flags to safely direct traffic and/or pedestrians.
- The current Persimmon Lane access road will remain the primary access point for the site. While the exact details must be determined in coordination with the RA contractor, the current plan is for construction traffic to exit the site along Persimmon Lane. Potentially 1 to 2 additional access points may be needed to facilitate traffic movement given the area that will be addressed by construction.
- At the end of the main access road, there will be a turn-around area outside of the main gate so that unauthorized or accidental entrants can easily turn around and exit the area, to help avoid traffic congestion;
- To limit interference with residents and also tracking soil onto roadways, the most direct route to the Command Post or other areas will be taken by all vehicles; and,
- The RA contractor will provide any pertinent information including any detours, temporary changes, or road closures that could affect the nearby community prior to work beginning.

## 3.5 PHYSICAL HAZARDS

Active construction during work hours presents the possibility for injury for any residents or community members that may trespass or be too close to work areas or transportation corridors. Heavy equipment activities and truck traffic will be a constant on and around the landfill during site cleanup activities. During non-work hours (e.g., evenings, weekends), it is likely that equipment and materials will be left at various locations on site, open excavation areas will be present, and other potential physical hazards will exist on site. Any climbing on equipment or walking in or near excavated areas or other work areas is not permitted and presents a high risk for injury. Access to the site will be strictly controlled. Appropriate spotters, safety equipment, fencing and other markings will be deployed to minimize the chance of injuries during and after work hours.

### 3.5.1 Planning for and Addressing Physical Hazards

Temporary construction fencing or equivalent will be used to cordon off areas of the landfill in which equipment is operating and/or material is being handled as well as along any access roads. Site features such as signs, posts, markers, and guard rails will be replaced if they are disturbed during the project.

An excavation pit of approximately 30 feet in depth will be open for a significant amount of time during the RA. During the evening and weekend hours, EPA and the RA contractor will erect temporary fencing to secure the area and trespassing in the area is strictly prohibited. Access into the excavation area may result in injury or loss of life. EPA and the RA contractor will work as timely as possible to backfill the area to eliminate any safety concerns.

# 4.0 PROJECT SECURITY AND SAFETY MANAGEMENT

## 4.1 SITE SECURITY

During construction activities on the Landfill, a 6-foot-high temporary chain-link construction fence, high visibility construction safety fencing or equivalent will be put up around construction areas, open excavation areas, material staging areas and access road to prevent unauthorized access to the site. There will be a vehicle gate at the main entry of the landfill off the Persimmon Lane access road. Vehicle gates will also be installed at other entry/access points that are established, as needed.

## 4.2 PROJECT SAFETY MANAGEMENT

The focus of this CHAWP is on those potential concerns that may affect the public's health during cleanup activities. A separate construction HASP will address worker safety and will be developed by the RA contractor before work will begin.

Before the RA contractor and any sub-contractors are hired, that contractor's health and safety programs are reviewed to make sure they are in compliance with EPA's safety guidance. Written procedures and proper training are required for all personnel who will be working on the project. Contractor briefings will be held to discuss potential site hazards and proper safety procedures on the Site. An EPA representative will be assigned to oversee contractor work and to verify that the safety procedures are being implemented and monitored appropriately.

Before beginning work, the RA contractor is also required to develop an emergency evacuation and incident response plan for a variety of potential emergencies (such as fires and chemical spills) that might happen during the cleanup work. These plans are incorporated into the site HASP and communicated to anyone that enters the site. These plans are also provided to off-site emergency response agencies (police, fire, hazmat) who may respond to onsite incidents.

### 4.2.1 Emergency Situations and Response

In the event of an emergency situation, site personnel will notify 9-1-1 and their immediate supervisor and/or the Site Safety Officer (SSO) or their designee. The RA contractor will develop an Emergency Action Plan prior to beginning work. If a site evacuation order is given, workers will stop work immediately and leave site to report to a designated muster area for further guidance.

# 5.0 COMMUNITY EDUCATION AND INVOLVEMENT

Communication with the community and individual residents regarding the pending cleanup and CHAWP is critical to the success of this project. The goals of the EPA are to establish open lines of communication with all community members, seek and incorporate input from the community, provide understandable project information, make project information easily accessible, and quickly provide information about project emergencies to the public.

The information below presents the current planned communication tools and how EPA plans to use these tools during various phases of the Hidden Lane RA. Information will be updated frequently using a number of communication methods to provide project information to the public. The following reports, information, and contact information will be provided by the EPA and/or the RA contractors.

## 5.1 COMMUNITY PRESENCE AND EDUCATION

EPA and its RA Contractor will establish a Command Post at the entrance to the Hidden Lane Landfill Site off Persimmon Lane that is open to the public to visit and talk about their questions and concerns during the cleanup. This Command Post will be staffed during work hours. EPA will develop informational materials that explain the plans for the cleanup, contact information, schedules, and progress.

Public and private meetings are intended to educate the community regarding the short- and long-term cleanup plans for the Hidden Lane RA and to provide forums for dialogue between the cleanup team and the community. Special issue public meetings may be arranged by EPA for any unique or unexpected issues that arise. These meetings can take place at any time in the cleanup process, as necessary.

When needed and invited, EPA will attend meetings of other local community organizations to discuss any aspect of the Site.

## 5.2 PUBLIC NOTICES

For any announcement of public meetings or major cleanup activities, it is EPA's goal to distribute appropriate announcements prior to the meeting/activity through all the avenues discussed below. Cleanup activity announcements could include fact sheets summarizing work/plan, finalization/update of this CHAWP, or completion of a cleanup phase or the entire cleanup. EPA will distribute meeting announcements to homes located within a half-mile radius of the work site. It is EPA's intention to place a large information sign at the entrance to the Site which will include basic information about the project, map of project areas and contact information for EPA.

EPA will post all public meeting and cleanup activity announcements on the EPA Hidden Lane Landfill website at www.epa.gov/superfund/hiddenlane. Additionally, EPA has established a Hidden Lane Superfund Site email address (R3-Hidden.Lane@epa.gov). EPA will send out updates and other site-

related information to the community via this email address. If you are interested in being added to the email mailing list, please send a message to the R3-Hidden.Lane@epa.gov to request to be added. General questions can also be submitted to this address. EPA plans to utilize the Hidden Lane Landfill website to consolidate data that is collected during the RA (for example, daily and weekly air quality monitoring data reports). The EPA RPM and CIC will be ultimately responsible for the website content, but EPA or contractor support staff will likely aid in loading new content. When new content is added, notifications can be sent out to residents and other stakeholders who have signed up for the email list.

## 5.3 PROGRESS REPORTS

Progress reports will be generated by EPA and the RA contractors on a regular basis. As with the air quality monitoring data, these reports may also be posted on the website, once all sensitive content (i.e., names, addresses of residents/workers) has been redacted. The progress reports may include:

- Updates on current work activities and schedule;
- Future work activities and schedules;
- A summary of any results of the monitoring results;
- A summary of any emergencies or on-site incidents and how they were handled, if applicable; and,
- Any upcoming work that will affect the local community (changes in traffic patterns, construction noise, etc.)

Hard copies of the progress reports will be available at the EPA Command Post. As some community members may not access the internet, copies of the progress reports will be provided to the public by other means. The public can request copies of the reports using any of the methods listed below in Section 5.5.

## 5.4 IMPORTANT CONTACT INFORMATION AND REGISTERING INQUIRIES

The EPA are to required to enable the public to register project-related complaints during work activities, and to provide complainants with timely and accurate notification of EPA's efforts to address their complaints.

The public is encouraged to contact the EPA RPM, OSC, and CICs, including to request information and/or ask questions, and voice complaints. They can also visit the EPA Command Post that is located at the entrance to the Site. When inquiries are received by phone, email or in person, the communication will be documented in a log noting the time received, subject of the inquiry, the name of the individual submitting the inquiry, and any follow up required (e.g., if any agencies need to be involved). It is expected that most phone inquiries will be fully addressed during the initial communication (i.e., question will be answered or requested information will be sent to individual making request). Email inquiries will be acknowledged within 24 hours of receipt and a response will be provided as soon as possible.

### 5.4.1 Telephone

Community members can call the following project team leads:

- EPA Remedial Project Manager, Austin Oelschlager, (267) 896-4455
- EPA On-Scene Coordinator, Charles Rapone, (445) 236-7844

### 5.4.2 Email Address

Email provides an opportunity for quick and direct communication. The public is able to communicate with the EPA project team by email. The public will be able to register inquiries via email. A link to this email address is provided below and on the Hidden Lane Website: www.epa.gov/superfund/hiddenlane.

**Email Address: R3-Hidden.Lane@epa.gov**

## 5.5 DESIGNATED COMMUNITY LIAISONS

EPA has designated a CIC and a Community Health and Safety Officer (CHSO) who will assist the public in receiving project information and communicating relevant information to the public.

### 5.5.1 Community Involvement Coordinator

The CIC will be available to answer questions or address concerns. This project representative will coordinate public outreach between EPA and the community, and will also attend project- related meetings, to inform the public of project activities.

The CICs are:

John Brakeall
brakeall.john@epa.gov
215-814-5537

Nancy Cruz
cruz.nancy@epa.gov
215-814-5518

### 5.5.2 Community Health and Safety Officer (CHSO)

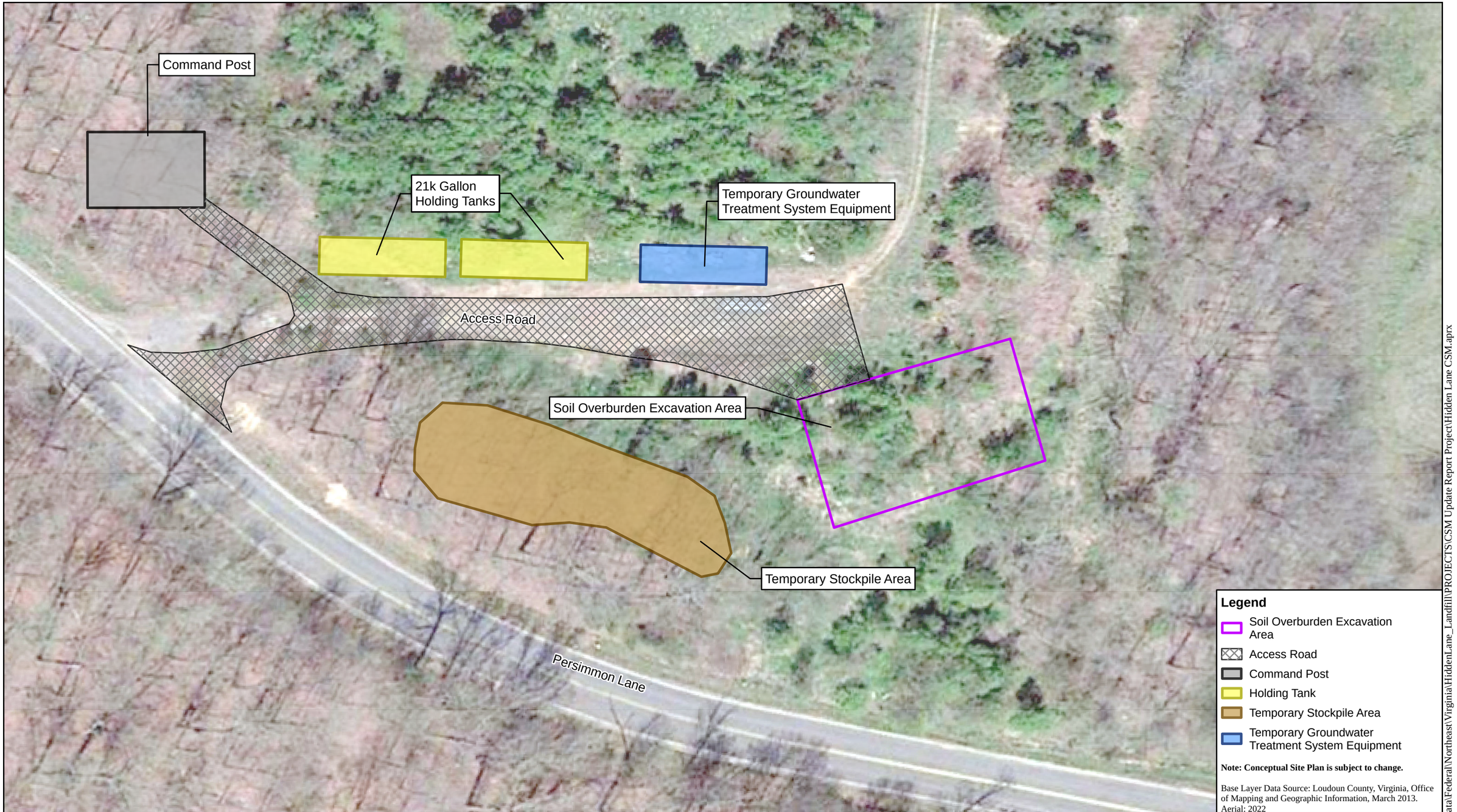
The CHSO is responsible for identifying potential risks to the community during the project and communicating these risks to the public, in addition to discussing the safety measures that EPA and the RA contractor will take to make sure the community is safe during the project activities. Austin Oelschlager is also the CHSO for this project. Her contact information is listed below:

Austin Oelschlager
oelschlager.austin@epa.gov
(267) 896-4455

## 6.0 DEFINITIONS

| | |
|---|---|
| µg/m3 | Micrograms per cubic meter |
| > | Greater than |
| CERCLA | Comprehensive Environmental Response Compensation, and Liability Act |
| CHAWP | Community Health and Welfare Plan |
| CHSO | Community Health and Safety Officer |
| CIC | Community Involvement Coordinator |
| dBA | Decibels, adjusted to human hearing |
| DustTRAK | DustTRAK DRX Desktop Aerosol Monitor 8533 |
| E&SCP | Erosion and Sediment Control Plan |
| EPA | United States Environmental Protection Agency |
| HASP | Health and Safety Plan |
| MCL | Maximum Contaminant Level |
| $mg/m^3$ | milligrams per cubic meter |
| OU | Operable Unit |
| POETs | Point of Entry Treatment Systems |
| PPE | Personal Protective Equipment |
| RA | Remedial Action |
| RI | Remedial Investigation |
| RPM | Remedial Project Manager |
| SSO | Site Safety Officer |
| TCE | Trichloroethylene |
| TWA | Time Weighted Average |

# APPENDIX A
# Hidden Lane Landfill
# Site Layout Figure




**U.S. Environmental Protection Agency**
**Hidden Lane Landfill Site**
**Loudoun County**
**Sterling, VA**

**FIGURE 1**
**CONCEPTUAL SITE PLAN FOR OU3 EXCAVATION**

\\lovetongis\GIStata\Federal\Northeast\Virginia\HiddenLane_Landfill\PROJECTS\CSM Update Report Project\Hidden Lane CSM.aprx