



## ANACOSTIA WATERSHED CITIZENS ADVISORY COMMITTEE

*Dedicated to the protection and restoration of the Anacostia River and its tributaries*

March 7, 2014

Jon Capacasa, Water Division Director  
US Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Mr. Capacasa:

I have been asked to write to you on behalf of the members of the Anacostia Watershed Citizens Advisory Committee (AWCAC) regarding the need to coordinate activities of your Division and its DC counterpart, concerning toxic pollutants in the Anacostia River, with the parallel effort of EPA and DCDOE under CERCLA to clean up the River's toxic sediments.

First, let me say the Committee is pleased at the attention now being given to the identification and removal of toxic pollutants from the tidal Anacostia. As you are well aware from your own longstanding efforts, this is a problem that has eluded authorities at all levels of government for decades. We now have an opportunity to make real progress in removing this hazard from our midst.

AWCAC has reviewed and provided comments on the first document made available under the sediment clean-up strategy, the Workplan for the Remediation Investigation. One thing we noted was an effort by EPA and the District to update the toxics Total Maximum Daily Load (TMDL) and to develop a related Implementation Plan. Because the in situ legacy sediments may provide a pathway for toxic pollution by re-suspension and movement in the tidal system, we are anxious to be sure the two efforts are well coordinated.

For example, if re-suspension is an issue, it is important to understand the relative role of storm events versus normal conditions. Yet the TMDL monitoring effort is limiting the investigation to a ½ inch storm, which may be too small to trigger an event in the sediments. We believe you should reconsider this part of the monitoring plan to provide greater support to the CERCLA-based sediment studies.

We would also like to understand better how the TMDL will lead to the assignment of reductions to in situ sediments under the wasteload allocation. It could be that such an allocation would support decisions to remove or remediate those sediments down the road. All this will require high levels of coordination in both work and timetables. We would like some assurance that the players are aware of each other's efforts and timetables so that the results of the water quality and sediment studies are matched up and lead to a solid set of common recommendations to deal with toxics in the River. Because the schedule of the CERCLA effort seems to be leading to removal decisions in 2017, and

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because that is more or less the timeframe for renewal of both CSO and MS4 permits from your Division, this is an achievable goal in our minds.

Thank you for considering these comments; we look forward to your response.

Sincerely,

William Matuszeski, AWCAC Chair

cc: Keith Anderson, DCDOE  
Hamid Karimi, DCDOE  
Paul Conner, DCDOE