



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

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February 10, 2016

Mr. Marshall Yacoe
Fairfax Petroleum Realty LLC
6820-B Commercial Drive
Springfield, VA 22151

RE: **PC#2010-3028**; Former Great Falls Exxon
9901 Georgetown Pike, Great Falls, Fairfax County 22066
Corrective Action Plan Implementation Report Q4 2015, dated January 29, 2016

Dear Mr. Yacoe:

The Northern Virginia Regional Office of the Virginia Department of Environmental Quality (DEQ) has completed review of the referenced Corrective Action Plan Implementation Report (CAPI) prepared for Fairfax Petroleum Realty, LLC (Fairfax Petroleum) by Kleinfelder. In the report, Kleinfelder concludes: "the endpoints communicated in the CAP Addendum Approval letter have been attained and Kleinfelder, on behalf of Fairfax [Petroleum], requests DEQ approval to suspend remedial system operations and begin a trial rebound assessment."

While DEQ agrees that the results of the correction action are encouraging, and moving toward achieving the approved CAP objectives, DEQ does not consider the remedial objectives have been achieved. DEQ agrees, however, that a brief system shut down is appropriate at this time to evaluate the effectiveness of the remediation in cleaning up the onsite shallow groundwater.

DEQ requests that the system continue to be operated until a representative number of groundwater samples has been collected to allow the conditions at shut off to be documented. The system may then be switched off to allow groundwater elevations across the site to recover to pre-system operation elevations. Groundwater should then again be sampled. Remediation should then be restarted pending review of the pre- and post-recovery groundwater concentrations across the facility and in offsite monitoring wells.

DEQ does not consider remedial objectives have yet been achieved for the following reasons:

Dissolved-phase concentrations in MW-23D have risen in the most recent groundwater monitoring event. While concentrations remain below the approved objective, no statistical test has been completed to show with reasonable confidence (e.g. 95% UCL) that the available data confirms the remedial objective has been achieved (Bullet 3 in the CAP approval letter of March 2, 2015 “3/2/15 letter”).

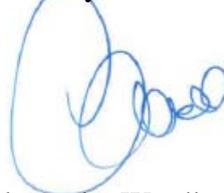
The shallow groundwater endpoint of 5,000 ug/l for MTBE onsite was approved based on reducing concentrations offsite (i.e. at “the new Exxon”) consistent with natural degradation once the source of the MTBE had been abated. The “new Exxon” data shows at least some offsite wells with stable, and elevated, MTBE concentrations (Bullet 4: 3/2/15 letter). An assessment of the offsite MTBE concentrations needs to be completed. Once this assessment has been completed, please provide a recommendation regarding appropriate action to address the offsite MTBE concentrations.

The overall amount of MTBE in shallow groundwater (e.g. as calculated from the groundwater recovery rates) needs to be shown to be below amounts which could result in MTBE flowing back into bedrock groundwater at concentrations that could cause bedrock groundwater objectives to be exceeded. A comparison of shallow groundwater contamination and acceptable mass flux to bedrock groundwater under current conditions has not been completed (Bullet 4: 3/2/15). It would be helpful in understanding the effectiveness of the correction action to provide a comparison of estimated MTBE in the subsurface with estimated recovered MTBE over time since the release was detected.

I look forward to receiving the results of the further corrective action activities.

Please feel free to contact me via e-mail at alexander.wardle@deq.virginia.gov or by telephone at (703) 583-3822 if you have any questions concerning this matter.

Sincerely,



Alexander Wardle
Environmental Geologist

cc: File
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