



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193

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[www.deq.virginia.gov](http://www.deq.virginia.gov)

Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

Thomas A. Faha  
Regional Director

February 23, 2016

Mr. John Black  
Environmental Compliance Program Manager  
Virginia Electric and Power Company d/b/a Dominion Virginia Power  
2400 Grayland Avenue  
Richmond, VA 23220

RE: Pollution Complaint Number (PC#) **2016-3142**  
Virginia Electric and Power Company Crystal City Substation  
18th Street South and South Fern Street, Arlington, Arlington County  
DEQ correspondence dated February 2, 2016  
Unified Command meeting on February 17, 2016

Dear Mr. Black:

In correspondence dated February 2, 2016, the Virginia Department of Environmental Quality (DEQ), Northern Regional Office, requested that Virginia Electric and Power Company (Dominion) submit an Initial Abatement Report (IAR) by March 2, 2016, and a Site Characterization Report (SCR) by April 4, 2016. These reports were in response to the January 24, 2016, release of approximately 13,500 gallons of mineral oil from a transformer located at the referenced site. Initial actions performed by Dominion included the recovery of free phase mineral oil from the gravel fill and removal of mineral oil from several cable vaults and one stormwater manhole. Dominion estimated that 11,000 gallons of oil had been recovered. At that time, there were no indications of mineral oil beyond the immediate area of the facility. However, on February 3rd, this office received reports of oil sheen on the Potomac River. The source of the sheen was ultimately tracked to Gravelly Point and the Roaches Run Waterfowl Sanctuary. On February 4th, the United States Coast Guard (USCG) federalized the incident and established a Unified Command structure that included the DEQ, the District of Columbia's Department of Energy & Environment (DOEE), the Environmental Protection Agency (EPA), and other affected parties. After reviewing analytical comparisons between the transformer oil and samples from the oil sheen on Roaches Run, on February 12th, Dominion agreed to assume responsibility for the sheen on Roaches Run.

On February 17, 2016, the members of the Unified Command met with personnel from Dominion at the offices of the DOEE to discuss the process for transitioning the oversight of the abatement and cleanup activities from the Federal to State level. On February 19th, USCG Lt. David Ruhlig formally announced that the Unified Command was standing down from the Emergency Response phase and transitioning the site to Remediation. This consensus decision was based on the absence of any new sheen, no additional wildlife mortalities, and the identification of the oil source as the failed transformer. From this point forward, the Virginia DEQ would take the lead on remediation efforts (in addition to the original release activities). The USCG and DOEE would remain available for support as requested.

The February 17th meeting also included discussion of onsite activities that the Unified Command members expected to continue as well as activities that were no longer considered necessary or critical. The members also discussed both mid- and long-term actions that would be completed as the site work progresses. As indicated to Dominion during the meeting, in light of the various members concerns and involvement, the DEQ would provide Dominion with a more detailed outline of the expected short and long term actions. Those actions are as follows:

#### Immediate/Short Term Actions

- Pending a review by the Unified Command scientific advisors, the hard booms located at Gravelly Point will be removed. Prior to removal of the booms, email notification will be made to the members of the Unified Command (e.g., USCG, DOEE, EPA, Arlington County). This notification should allow ample time for any member who wishes to be on-site during the removal.
- Prior to removal, any floating debris (i.e., trash) behind the booms will be collected and sent to a proper disposal facility.
- As a precaution, the hard booms located near the southern outfall inside of the Roaches Run Sanctuary will remain in place.
- As a precaution, the soft absorbant booms located at the storm sewer outfalls inside of the Roaches Run Sanctuary will remain in place.
- Dominion will conduct daily inspections of Roaches Run and Gravelly Point and submit, via email, weekly updates to this office. If additional sheen (or any other sign of impact) is observed, Dominion is to contact this office immediately.
- Dominion will continue to remove/recover any oil that is observed in the cable vaults or storm sewer manholes.
- Dominion will continue to move forward with the submittal of the required IAR by the specified due date.

### Mid Term Actions

- Dominion will develop and perform a site assessment in the area of the facility in order to determine the extent and severity of the mineral oil release. The assessment should identify any areas that remain heavily contaminated. The assessment should also identify the locations where the mineral oil was able to flow/seep into or out of the subsurface utilities.
- Soil and groundwater samples will be obtained and analyzed with the appropriate methods.
- The required assessment should include a detailed survey of the storm sewer system between the facility and the outfalls at Roaches Run. As discussed in the February 17th meeting, the dye tracer study (or similar approach) would be useful in determining the exact flow path for the recent spill (or any potential future release). As a condition of access, Dominion will most likely be required to hire a contractor to conduct the survey and to use non-chlorinated water for the study. Arlington County should be contacted as soon as possible in order to discuss access and technical issues. Members of the Unified Command should be also be contacted in order to address any potential concerns as well as the actual timing and performance of the study.
- Depending on the results of the subsurface assessment and the dye tracer study, performance of a camera survey of the storm sewer system should be evaluated.
- Dominion will continue to move forward with the submittal of the required SCR. Any request for extensions will be dependent on the circumstances.

### Long Term Actions

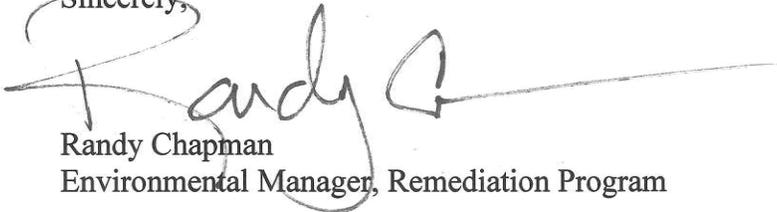
- Upon review of the required SCR by this office, either additional assessment will be requested or Dominion will be required to develop a Corrective Action Plan (CAP). However, the shape and scope of these submittals will be dependent on the results of the required assessment and monitoring.

The listed items are not intended as a complete and final list of all required activities. Additional work may be requested as site conditions change. Additionally, the time schedule for reports and updates may be adjusted as necessary. As indicated in the February 2nd Confirmed Release letter, **Joe Glassman** (703-583-3808 / [Joseph.Glassman@deq.virginia.gov](mailto:Joseph.Glassman@deq.virginia.gov) ) has been assigned as the DEQ case manager. Mr. Glassman will assist you in completing the required reports and working through the day-to-day technical issues. The weekly (and any daily) email updates should also be sent to Mr. Glassman. However, for the immediate future, please also email me the updates.

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If you have questions or comments, please contact me at (703) 583-3816, through email at [Randy.Chapman@deq.virginia.gov](mailto:Randy.Chapman@deq.virginia.gov), or by letter at the above address.

Sincerely,

A handwritten signature in black ink that reads "Randy Chapman". The signature is written in a cursive style with a long horizontal line extending to the right.

Randy Chapman  
Environmental Manager, Remediation Program

Cc: LT Dave Ruhlig, USCG  
Joshua Rodriguez, DOEE  
John Emminizer, DOEE  
Charlie Fitzsimmons, US EPA  
Peter McGowan, US FWS  
Diana Handy, Arlington County