

Petroleum Case 20163090, Robinson Terminal North,
Review of Comments submitted on Corrective Action Plan for Robinson Terminal North

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Who is the "owner" of the sites and responsible for the cleanup?	William Hillner on March 12, 2019	The responsible person for the petroleum program "cleanup" is the owner of the property and the registered owner of the underground storage tanks that were on the site at the time the release was reported. Our records show this entity to be The Washington Post Company. On May 4, 2016, Alexandria North Terminal LLC assumed responsibility for completing the petroleum clean up required by DEQ. Should Alexandria North Terminal LLC fail to complete the required clean up, The Washington Post Company would be tasked to complete it.
What were the non-petroleum issues involved in the origin.goval VRP? The issues should be addressed in an Appendix. Also, please provide the pertinent studies that led to this "non typical" approach.	William Hillner on March 12, 2019	Non petroleum issues will be addressed under the DEQ Voluntary Remediation Program (VRP) and any contaminants which exceed a screening concentration will be evaluated for risk and possible remedial action as part of the Remedial Action Plan (RAP). This is the standard approach for evaluating risk under the VRP. The Virginia Unified Risk Assessment Model (VURAM) will be utilized to run the risk assessment. This petroleum program CAP will be incorporated into that RAP so a comprehensive approach to the property contaminants is taken.
Mention is made of "Investigations ordered by the United States Environmental Protection Agency (EPA) and VDEQ in the 1970s revealed elevated levels of arsenic in soil, groundwater, and sediment. Impacts to	William Hillner on March 12, 2019	As far as DEQ is aware, no petroleum contaminants were involved in the USEPA investigations. DEQ's VRP will address all contaminants which exceed a risk screening criteria as discussed above. All documentation

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<p>soil and groundwater were interpreted to extend onto the western portion of the 500 Parcel(RTN-West)." The investigations should be provided. In addition, any subsequent agreements regarding use and/or development of the site, including any Consent Agreements involving USEPA, VDEQ and/or the City, should be provided.</p>		<p>related to either the VRP or petroleum program cases is available for review and can be requested through the Freedom of Information Act (FOIA) at any time.</p>
<p>Mention is made of "the risks associated with impacts could be alleviated by developing the property using strict guidelines for architectural design and limiting disturbance of soil during construction". The guidelines should be specified, especially those related to exposure to near neighbors during construction, residents along any transportation routes and residents post construction.</p>	<p>William Hillner on March 12, 2019</p>	<p>As there is no final development plan for the property, the details of specific guidelines are not in this corrective action plan. The CAP provides general appropriate guidelines that should be implemented in the final development.</p> <p>Exposures occurring during construction and material transportation are not under the DEQ petroleum program's authority</p>
<p>The CAP does not mention the possible intermingling of contamination from the Alexandria Town Gas plant. This oversight needs to be corrected, including discussion of liability for remediation.</p>	<p>William Hillner on March 12, 2019</p>	<p>The site characterization and monitoring carried out for the petroleum case do not indicate any significant contaminant movement from the Alexandria Town Gas site to the Robinson Terminal site. If significant excavation and dewatering were proposed that would be a potential issue the responsible party and the developer would have to address.</p>
<p>The CAP does not mention the possible intermingling of contamination from the WMATA Bus Barn site. This oversight needs</p>	<p>William Hillner on March 12, 2019</p>	<p>The site characterization and monitoring carried out for the petroleum case do not indicate any significant movement of petroleum arriving from</p>

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<p>to be corrected, including discussion of liability for remediation.</p>		<p>the direction of the WMATA bus facility at 600 N Royal St to RTN. Available contaminant information for closed case 19954041 for the WMATA facility did not indicate any significant petroleum contamination extending across N Royal St. DEQ understands that underground storage tanks on the WMATA facility may be closed in the near future and if closure investigations indicate a petroleum release has occurred, a case will be opened and further investigation requested of the responsible person for that release.</p>
<p>Mention is made of "A Conceptual Site Model developed as part of the SCS was used to identify potential receptors and potential exposure pathways under current land use (vacant property with limited access) and future land use scenarios (commercial, retail, residential, or mixed use), and during construction, and to complete the RA."</p>	<p>William Hillner on March 12, 2019</p>	<p>No comment made.</p>
<p>The CAP mentions "Over-excavation of 2 feet or more of impacted soil will also be considered for areas where higher degrees of impact were noted and areas that will be overlain by landscaping (to limit the potential for contacting impacted soil in the future)."The CAP should provide a rough estimate of the volume of material that will be excavated. There are at least 5 known</p>	<p>William Hillner on March 12, 2019</p>	<p>The volume of soil that needs to be excavated and removed to meet the CAP objectives will depend on the final development plan, the VRP risk assessment, and the engineering and institutional controls. Transportation of excavated material, including soil, generated during remedial action work or from development is beyond DEQ's statutory authority.</p>

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<p>carcinogenic elements, including benzene, in the impacted soil. The mode of transportation from the site to suitable disposal MUST and should be by barge, as was done at RTN and NOT TRUCK to minimize exposure to residents.</p>		
<p>The CAP mentions "The institutional controls will be developed by ANT's council." Institutional controls need to be described in detail.</p>	<p>William Hillner on March 12, 2019</p>	<p>The details of appropriate institutional controls will depend on risk assessment and the final development proposals.</p>
<p>The toxic substances on this site have been studied using accurate modern methods not available when the contaminants were deposited on the site at a time when their extreme toxicity was not understood. Therefore, DEQ has an opportunity and an important responsibility to rectify the grave sins against the environment that our unknowing forebears committed.</p> <p>The contaminants include the dissolved petroleum products which continue to leach into the Potomac River and therefore pose a health threat to any future residents of the area and to the Potomac River. At some level the threats to the river pose a threat on the entire length of the river and are an issue for the entire state of Virginia. The non-petroleum toxins farther away from the river.</p>	<p>Katy Cannady, March 13, 2019</p>	<p>There is no evidence from the investigation activities carried out of petroleum contaminants leaching into the Potomac River from RTN. Petroleum contaminants detected in groundwater in monitoring wells near the Potomac River were below concentrations that would pose a risk to human health or the aquatic environment. The CAP approval will task the responsible party to ensure this continues to be the case and that any land development activities remove elevated areas of petroleum contamination near the former oil depot property and prevent mobilization of petroleum contaminants by properly managing groundwater and engineering the site to prevent significant surface infiltration.</p> <p>The VRP work will entail the development of a RAP which is protective of human health and the environment.</p>

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<p>chiefly arsenic left over from the site of the Bogle Chemical plant, pose a continuing threat to human and animal life on this land. In the past that threat was recognized by placing a concrete cap on the part of the contaminated area and that cap sits above some part of the area today. If any part of the cap is removed, future residents must receive as much protection as if the concrete cap were still there. That is as important as protecting the Potomac River.</p> <p>Because we suffer from more additional toxins than petroleum, it is absolutely necessary that you DEQ experts in other than the petroleum residues, be deeply involved in constructing the remediation plan. With that in mind, I have addressed my comments to all of you in the hope and expectation that you will all be involved in creating this vitally important corrective action plan for the Robinson Terminal North That you for acting citizen comments on your plan</p>		
<p>As you are aware, this property has had a history of uses that have resulted in serious petroleum and non-petroleum contamination. Thank you for addressing the</p>	<p>Nina Randolph, March 15, 2019</p>	<p>The VRP program will be reviewing the RAP for contaminants which are above the screening criteria when that document is received from the property owner. The Public Notice (PN) for the</p>

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<p>petroleum aspect of the situation. Our Ad Hoc group has been eager for a representative from the non-petroleum aspect of the studies to speak with us. We anticipated that that would happen earlier, but it has not.</p> <p>When you gave your report to us, we learned of the March 14th deadline for the petroleum CAP. That was the first time we knew of that - which gave short notice.</p> <p>I am writing to request the deadline for comments from the public on the CAP for the petroleum report be extended so that the citizens have a chance to review it and to have the non-petroleum professional present to us the issues and CAP for the property. Treating the problems on the RTN properties as a whole and seeing the CAP for both at the same time is very important to understanding the situation. The health of our citizens and the Potomac River are utmost in our thoughts.</p> <p>Thank you for your help on extending the date for public opinion on the petroleum CAP so that we, the representatives of those who live in Alexandria, will know what precisely is being considered for this site.</p>		<p>VRP work will be completed in accordance with 9 VAC §§ 20-16-120, Public Notice section of the Regulations.</p> <p>The CAP was received by DEQ on February 1, 2019 and a public notice of the CAP submittal was made by Alexandria North Terminal LLC on February 14, 2019 in the <i>Alexandria Gazette</i>.</p> <p>Comments on the petroleum program CAP can be submitted at any time, even after CAP approval, and will be evaluated as appropriate when received. If petroleum CAP modifications or clarifications become necessary DEQ will require they are incorporated into the CAP, potentially through a request that the responsible party submit a CAP addendum.</p> <p>The formal comment period was extended to April 8th, 2019 to allow for additional comments to be received. One additional comment was received.</p>

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<p>Attached are some documents I received from EPA under a FOIA request.</p> <p>The “Notification of Hazardous Waste Activity” date stamped June 22, 1988 clearly indicates that the <i>Washington Post</i> is the legal owner of the site.</p> <p>The document was signed by Robert Taylor, VP.</p> <p>DEQ needs to clarify in the CAP the <i>Washington Post</i> liability for the site cleanup.</p> <p>Also, there needs to be a discussion about Alexandria North Terminal, LLC liability.</p>	<p>Hal Hardaway, April 8, 2019</p>	<p>The documents submitted have been uploaded to our files.</p> <p>The “responsible person” for the petroleum program “cleanup” is the owner of the property and the registered owner of the underground storage tanks that were on the site at the time the release was reported. Our records show this entity to be The Washington Post Company. On May 4, 2016, Alexandria North Terminal LLC assumed responsibility for completing the petroleum clean up required by DEQ. Should Alexandria North Terminal LLC fail to complete the required clean up, The Washington Post Company would be tasked to complete it.</p>