



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

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Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

May 13, 2019

Greg Hoffman
Alexandria North Terminal LLC
2900 K Street NW, Suite 401
Washington DC 20007

**PC#20163090, Robinson Terminal North,
500 and 501 North Union St, Alexandria,
Corrective Action Plan dated January 31, 2019**

Dear Mr. Hoffman,

The Department of Environmental Quality (DEQ) has completed review of the Revised Corrective Action Plan (CAP) received on January 31, 2019 from ICOR Ltd. The proposed remediation strategy either complies with or is not applicable to all parts of the referenced section of Virginia Regulations 9 VAC 25-580-290, Underground Storage Tanks, Technical Standards and Corrective Action Requirements. Approval of the corrective action strategy is hereby granted.

DEQ's petroleum program case 20163090 will remain open until a Remedial Action Plan (RAP) approved by DEQ's Voluntary Remediation Program is implemented. The RAP is anticipated to incorporate the requirements of this corrective action plan approval.

The CAP approval requires the following general principles are incorporated into the development:

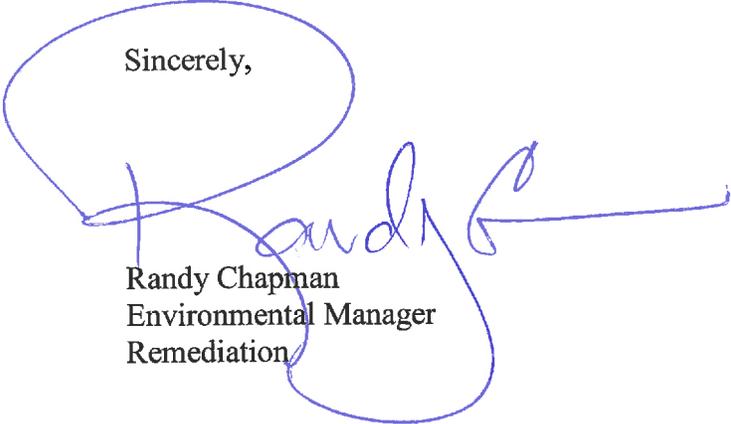
1. Soil in areas found near the old oil storage depot found to be heavily contaminated with petroleum will be removed;

2. Rainwater infiltration into, and the risk of direct exposures to, contaminated soil will be minimized by constructing hard cover (buildings, pavement or roadways) or by placing appropriately engineered clean fill and landscaping material;
3. Any dewatering discharges to surface water will require registration under the General VPDES Permit for Discharge from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests;
4. Any below ground structures will be protected from the risk of petroleum vapor intrusion from petroleum contaminated soil or groundwater left in situ by construction of appropriate vapor barriers or subslab ventilation.

CAP implementation monitoring reports will be provided every six months starting in July 2019. The CAP implementation reports will describe progress toward development and will include sampling and analysis of groundwater from the groundwater monitoring network. Once development has started, DEQ's petroleum program anticipates that the requirements of the corrective action plan will be met by being incorporated into the VRP Remedial Action Plan requirements.

Please feel free to contact Alex Wardle at 703-583-3822 or through email at alexander.wardle@deq.virginia.gov if you have any questions concerning this matter.

Sincerely,



Randy Chapman
Environmental Manager
Remediation

Enc

cc: File
McGuire Woods
ICOR Ltd
City of Alexandria
VRP

DEPARTMENT OF ENVIRONMENTAL QUALITY
Northern Virginia Regional Office
Memorandum

SUBJECT: PC#20163090; Robinson Terminal North, 500 and 501 N Union St, Alexandria,
TO: Randy Chapman, Environmental Manager, Remediation Division
FROM: Alex Wardle, Environmental Geologist, Remediation Division
DATE: May 8, 2019
COPIES: File

Responsible Party: Greg Hoffman, Alexandria North Terminal LLC
2900 K St NW, Suite 401
Washington DC 20007

Facility Location: Robinson Terminal North, 500-501 N. Union St, Alexandria

Public Notification: The release was from unregulated petroleum storage tanks. Public Notice was completed. Public notice was made in the *Alexandria Gazette* on February 14, 2019. Public comment was received and is included as a separate attachment along with DEQ's response to comments.

Cleanup Endpoints: No specific end points have been set as the corrective action requirements are expected to be met by engineering and institutional controls

The corrective action involves the adoption of engineered controls to prevent exposures to petroleum contaminated soil or the risk of petroleum vapor intrusion to occupied building space. Details of the engineering and institutional controls will be prepared once development plans are finalized. Groundwater remediation will not be required. There is not currently expected to be a discharge of groundwater. If, however, a groundwater discharge does occur, registration under the General VPDES Permit for Discharges from Petroleum Contaminated Sites will be required. Final design and implementation of the corrective action is anticipated to be carried out under the Voluntary Remediation Program.