



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY  
Street address: 629 East Main Street, Richmond, Virginia 23219  
Mailing address: P.O. Box 1105, Richmond, Virginia 23218  
www.deq.virginia.gov

Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

## MEMORANDUM

**SUBJECT:** Leaking Heating Oil Technical Workgroup Recommendations

**TO:** Heating Oil Technical Workgroup Members

**FROM:** Betty Lamp, Spill Response and Remediation Office Director

**DATE:** October 25, 2016

DEQ has received and reviewed the recommendations which are described in the June 2016 Leaking Heating Oil Tanks Workgroup Report of Recommendations. Throughout DEQ's interaction with the workgroup, the agency's focus has been to ensure consistency and reliability in communications with stakeholders. This is the result of those efforts.

Below is DEQ's response to the workgroup's recommendations.

### Short Term Goals

1. **Communication.** The group identified opportunities for improved communication between DEQ and the consultants hired by the regulated community. DEQ will take immediate steps to implement the recommendation to document and share the rationale for case closure with consultants via email (where it conflicts with the consultant's recommendation).
2. **Consistency in Case Categorization.** The group reached consensus on two items related to assigning case categories. DEQ will implement these changes to its case categorization criteria by November 1, 2016. The lead time is necessary to provide staff training to ensure consistency.

### Long Term Goals

1. **Petroleum Vapor Intrusion.** The group recommended that DEQ develop a Virginia-specific petroleum vapor intrusion risk evaluation framework for residential heating oil sites. DEQ intends to develop that framework upon completion of a PVI study designed to compare

model predictions to field data. This study will be developed and conducted in partnership with a state university. Guidance will be updated at that time.

2. Look Back Study. Also discussed during the workgroup meetings was the idea of DEQ doing a study to evaluate the effectiveness of past case closure decisions. DEQ intends to partner with a state university to design and conduct such a study.

DEQ's collaboration with the workgroup has been productive and the agency is confident that this approach to address both short term and long goals will yield the most effective program for the Commonwealth and the highest protection of Virginia's environment.