



February 12, 2015

Mr. Alex Wardle, Project Manager
Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, Virginia

RE: GFCA Special Committee on Groundwater Contamination
Inactive Fairfax Facility #26140
9901 Georgetown Pike
Great Falls, Virginia
VADEQ PC #2010-3028

Dear Mr. Wardle:

This letter contains further comments on the Corrective Action Plan Addendum for the subject property in Great Falls, contaminated by gasoline chemicals, from the former Exxon Station at 9901 Georgetown Pike, to be considered in addition to our letter dated December 1, 2014. These comments result from a technical review meeting that you chaired on February 5, 2015 among representatives of Fairfax Petroleum, Kleinfelder East, Great Falls Business and Professional Association, and the Great Falls Citizens Association. Our comments are as follows:

1. The monitoring report for the period ending, December 2014 showed that the soil vapor extraction system, which has been operation since June 2014, has been effective at removal of vapor phase Methyl Tertiary Butyl Ether from the shallow soil column beneath the former service station. The measured concentrations are consistently below the minimum detectable level, and Kleinfelder has recommended that the SVE system be deactivated. GFCA has no objection to this, but would ask that another more sensitive sampling and analysis method be used to take a few samples prior to shutdown, to provide an actual quantifiable concentration in the air being evacuated from the soil. We understand from the meeting that this can be done.
2. The GFCA representatives pointed out that the shallow and deep groundwater plume maps in the monitoring report were in error, because the data for several monitoring points near the leading edge of the plume were neglected inadvertently when the maps were drawn. We requested that the maps be redrawn and resubmitted promptly. Our subsequent review of the data confirmed that the leading edge of the plume in the southeast direction has not been reduced by the groundwater pumping..
3. We believe that the groundwater MTBE near the leading edge of the plume to the southeast beneath the BF Saul property, is not being drawn back towards the recovery well, even though some 2 million gallons of groundwater have been treated. Therefore we reiterate our recommendation from our December 1 letter, that an additional recovery well be installed near the leading edge of the plume in that direction. The engineering for this should be commenced immediately, so that it can be operated as soon as possible after the

MTBE concentrations on the original Exxon Station reach the end point.

Great Falls Citizens Association, P.O. Box 27, Great Falls, VA 22066

4. We reiterate our comment from the December 1 letter that there should be assigned a single end point for MTBE concentrations, rather than one for shallow groundwater, and one for deep groundwater. We would accept the lower value of 474 parts per billion MTBE recommended by Kleinfelder. We believe the comment from our December 1 letter on the derivation of this value has been adequately resolved by the Kleinfelder explanation at the meeting. However, we do not agree with the recommended end point of 5000 parts per billion for the shallow groundwater.

5. The Great Falls Citizens Association looks forward to a time in a couple of years when the groundwater pump and treat system will have done its job and reduced the concentrations of MTBE on the property to levels which cannot reasonably be expected to ever result in detectable levels in any private well in our community. However, the prospect of leaving any MTBE remaining on site means there is some possibility of well contamination at some time in the future. Therefore, we request, that in addition to the planned 1-year of monitoring after shutdown of the system, that the following be included in the Addendum:

In addition, a select line of wells outside the current known plume that are currently not testing positive for constituents of concern will be selected, from the north, south, and southeast. These wells will be sampled semi-annually for a period of 5 years following remediation shutdown. If any sampling of these wells tests positive for constituents of concern, additional corrective measures will be considered. If after this monitoring period no constituents of concerns are detected in any of these select wells, Kleinfelder, on behalf of Fairfax, will request no further action (NFA).

The Great Falls Citizens Association appreciates this opportunity to assist the Commonwealth of Virginia in protecting the public health of our citizens. We look forward to receiving and evaluating the quarterly site monitoring reports in the future.

Sincerely,

Great Falls Citizens Association

Original signed by ***Mark Eric Knudsen***

M. Eric Knudsen, President

M.E.K/gs

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Copy to:

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