



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY  
Blue Ridge Regional Office  
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David K. Paylor  
Director

Robert J. Weld  
Regional Director

September 6, 2017

The Estate of Lacy F. Dudley  
c/o: Mr. Mark Dudley  
Chamblissburg Supply (dba Elei's)  
4118 Mudlick Road, SW  
Roanoke, Virginia 24018

RE: Technical Review of the Release Investigation Report (RIR) at: Chamblissburg Supply (dba Elei's), 10625 Stewartsville Road (Route 24), County of Bedford, Vinton, Virginia, LUST PC No. 2017-2298, Facility I.D. No. 2-007350, CEDS I.D. No. 200000088223

Dear Mr. Dudley:

A technical review of the above referenced site investigation report has been completed. Based on our review of the release information provided and the conditions at the site, additional work is required. Upon completion of this additional site work a Site Characterization Report (SCR) must be submitted to the Blue Ridge Regional Office – Roanoke Office by **January 6<sup>th</sup>, 2018**.

Please review the following comments, discuss these with your consultant, and provide an appropriate response:

1. All underground petroleum tanks and lines must be helium tested for leaks. Special attention must be paid to the gasoline lines and they must be isolated and pressurized to show they hold pressure.
2. Water well completion reports must be obtained where possible for all impacted and threatened potable water wells at the site.
3. Where water well completion reports cannot be obtained for impacted supply wells, an attempt must be made to perform geophysical logging on the impacted well. The geophysical work must include a caliper log and other work as agreed upon by the DEQ.
4. A detailed geologic analysis of the area is required. Strike and dip measurements are necessary for all faults, fractures, bedding planes, etc. in the area, visible or recorded elsewhere.
5. Surface water samples are required and must include the pond northeast of the release site and the tributary to the East Fork of Beaverdam Creek. Analysis must include EDB, SVOC, VOC, and TPH-GRO tests.

6. Shallow ground water monitoring wells are required both on and off site. The wells must be sited to detect free phase petroleum and dissolved phase contamination. The wells must be sampled for EDB, SVOC, VOC, TPH-GRO, and total and dissolved lead.
7. Additional potable water wells east of the site must be sampled for initial impact.
8. All impacted drinking water wells and drinking water wells at significant risk of impact must be resampled and tested for EDB, SVOC, VOC, TPH-GRO, and total and dissolved lead.
9. Work should begin now to site new potential locations for replacement drinking water wells. Which properties will require an easement? Deep monitoring wells and alternate well lot characterizations will begin in earnest during the next report.
10. Let's examine methods for source removal. Is source removal a possibility here?
11. Iso-concentration maps and cross sections are required in the next report. Based on the geologic work already requested, resistivity lines maybe necessary.

The Virginia Petroleum Storage Tank Fund (VPSTF) has established procedures for financial reimbursement for authorized corrective action activities. Current information concerning VPSTF reimbursement is outlined in the Reimbursement Guidance Manual.

Prior approval of the site work is required if you plan to seek reimbursement for this pollution event. Enclosed with this letter is a Petroleum Cleanup Activity Authorization Form (AAF). For reimbursement eligibility you or your consultant must complete this form, specifying each task necessary to address the technical review issues. A topographic site map (1 inch: 2000 feet) and an approximate scaled map of the site showing pertinent features must accompany the Petroleum Cleanup Activity Authorization form. The form and site maps should be mailed or a facsimile sent to the Blue Ridge Regional Office – Roanoke for prior approval of this work on or before **September 20<sup>th</sup>, 2017**.

We encourage you to expedite the additional site work necessary to address the issues and to avoid enforcement action. Questions you may have concerning this technical review, the additional scope of work, or the reporting schedule should be directed to my attention.

Sincerely,



Robert L. Howard, PG  
Geologist Supervisor  
Site Coordinator

SCR Request.doc

cc: File ECM via e-mail  
Arthur T. Greene, Greene Environmental via e-mail