



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

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[www.deq.virginia.gov](http://www.deq.virginia.gov)

Douglas W. Domenech  
Secretary of Natural Resources

David K. Paylor  
Director

Thomas A. Faha  
Regional Director

July 10, 2013

Email only

Mr. Mark G. Nitz  
NRG Potomac River LLC  
1400 North Royal St  
Alexandria, VA 22314

**PC#2013-3154, 2x25000 Gallon Heating Oil Tanks,  
NRG Potomac River Generating Station  
1400 North Royal St, Alexandria  
Site Characterization dated June 28, 2013**

Dear Mr. Nitz:

The Virginia Department of Environmental Quality (DEQ) has reviewed the referenced Site Characterization Report (SCR) prepared on your behalf by URS Corporation. The SCR indicates that potential pathways for contaminant movement toward the Potomac River exist along underground utilities and associated backfill, along the power station construction fill and natural geology interface, and through permeable geologic units to groundwater. The extent and severity of the contamination identified during tank closure has not yet been determined.

Please submit an SCR Addendum to this office before **October 4, 2013**. The report should include the results of a laser induced fluorescence (LIF) survey delineating the depth and lateral spread of petroleum hydrocarbons, broadly consistent with the survey recommended by URS in section 3.1 of the SCR. The survey should be based on an initial grid of points around the underground storage tanks and extending across the area broadly delineated by outfall lines four and five and the Potomac River. Points should also be constructed beneath the floor slab of the boiler room adjacent to the underground tanks. You will need to contact the National Parks Service to arrange access for possible sampling in the area between the Potomac River and the NRG property boundary.

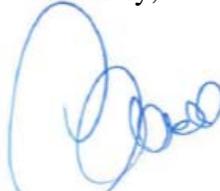
Groundwater monitoring wells should be constructed after the LIF survey to allow groundwater samples to be obtained or product thicknesses gauged. The number and location of monitoring wells will depend on the results of the survey.

The purpose of the LIF survey is to ensure that free phase petroleum is adequately delineated. The survey methodology therefore needs to be flexible and to allow for on-site decisions as to the most appropriate locations for further investigation. To ensure the survey meets DEQ data expectations, we recommend you keep DEQ and other interested regulatory authorities fully informed of the ongoing results of the survey and on the additional data points to be collected each day of the proposed survey.

The addendum should include, if necessary, recommendations for additional assessment or corrective action. After this office has reviewed the report, this office will assess whether case closure, additional assessment, or corrective action is appropriate.

As always, if you wish to access the Virginia Petroleum Storage Tank Fund (VPSTF), please submit an Activity Authorization Form (AAF) or competitive bids as soon as possible. If you have any questions, please contact me at alexander.wardle@deq.virginia.gov or directly at **(703) 583-3822**. Please include the Pollution Complaint Number 2013-3154 in all correspondence.

Sincerely,



Alex Wardle  
Environmental Geologist

cc: Adriane Rogers - URS  
Dan Imig - Alexandria Office of Environmental Quality  
Jacob Zangrilli - District Department of the Environment  
File