COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN REGIONAL OFFICE
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Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

March 17, 2015

Email only
Mr. B. McCullough
NRG Potomac River LLC
8301 Professional Place
Suite 250
Landover, MD 20785

PC#2013-3154, 2x25000 Gallon Heating Oil Tanks,
NRG Potomac River Generating Station
1400 North Royal St, Alexandria
Corrective Action Plan dated December 23, 2014

Dear Mr. McCullough:

The Northern Regional Office of the Virginia Department of Environmental Quality (DEQ) has completed review of the referenced Corrective Action Plan (CAP) prepared for NRG Potomac River LLC (NRG) by Groundwater and Exploration Services and Geosynthec. The proposed remediation strategy complies with the Virginia DEQ Storage Tank Program Technical Manual. Approval to begin the proposed corrective action is hereby granted. CAP Tracking Number 513 is issued for the approved corrective action.

Please submit the CAP Implementation Monitoring Reports (CMR) to the Remediation Division of the DEQ Northern Regional Office. Please provide a CMR each quarter, within 30 days of the events described in the report. The first CMR is expected by April 27, 2015.

This Corrective Action Plan is approved based on the proposals in NRG's CAP, subject to the following additional requirements and clarifications:

1. The CAP remedial objectives for petroleum contaminants in groundwater are:

i. achieve compliance with the limits and requirements of the General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests as found in 9VAC25-120 for petroleum; and

ii. remove free phase petroleum to a thickness of 0.01 feet or to the maximum extent practicable.

The VPDES requirements are designed to protect the Virginia Water Quality Standards as found in 9VAC25-260 et seq., specifically concerning standards for human health and aquatic life.

2. Routine quarterly groundwater monitoring will be carried out for TPH-DRO using EPA method 8015. Annual monitoring will include sampling and analysis of select wells using EPA method 8260 to quantify the continued presence of volatile petroleum contaminants and naphthalene. In the April 2015 CMR, please provide a table showing the wells and seepage points proposed for routine sampling and analysis.

3. Groundwater monitoring will continue for eight quarters (two years) after the end of active remediation (once end points are met) to confirm that remedial end points continue to be met and contaminant trends are either stable or reducing. Post remediation monitoring will include the routine monitoring wells and selected remediation wells. Please provide a table of proposed post remediation wells in the April 2015 CMR.

4. Please submit an annual review (in the April CMR of each year) of CAP effectiveness, including, but not limited to, an assessment of product transmissivity and recoverability.

5. NRG will work with the City of Alexandria to ensure that all necessary permits and conditions regarding working hours, noise and other local planning and building control requirements are met.

6. If a significant change in use for the property is applied for, or approved, before case closure that may affect the applicability of the currently approved remedial end points, NRG will prepare a corrective action plan addendum to determine whether a change in the remedial objectives, or remedial technology, is necessary.

7. In addition to the requirements of this CAP, DEQ understands NRG will work with the National Parks Service (NPS) regarding:

   i. additional sampling NPS may require on their property;

   ii. any additional clean up NPS require for the soil and groundwater on NPS land that exceeds DEQ requirements;

   iii. an appropriate scope and schedule of repairs for the sheet pile wall on NPS land.

8. In addition to the requirements of this CAP, DEQ understands NRG will work with the District Department of the Environment on the District's requirements regarding potential discharges to the Potomac River and river sediment.

Please note: A General VPDES Permit for Discharges from Petroleum Contaminated Sites is required (or NPDES for a discharge to the Potomac), and an Air Permit or Air Permit Exemption letter is also required, for the referenced corrective action. The CAP is issued independent of any local government ordinance requirements. The April 2015 CMR should include details of required permits and progress towards obtaining those permits.

Please feel free to contact **Alex Wardle** via e-mail at alexander.wardle@deq.virginia.gov or by telephone at (703) 583-3822 if you have any questions concerning this matter.

Sincerely,

Randy Chapman
Environmental Manager
Remediation

Enc. Summary of CAP comments and DEQ discussion of comments

cc: File
GES: GReichart@gesonline.com
Geosyntec: MJohnson@Geosyntec.com
City of Alexandria: KhoaDinh.Tran@alexandriava.gov
National Park Service: emily_ferguson@nps.gov
District Department of the Environment: jacob.zangrilli@dc.gov