



Transportation and Environmental Services

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February 10, 2015

Mr. Alex Wardle
Northern Regional Office, Petroleum Program
Virginia Department of Environmental Quality
13901 Crown Court,
Woodbridge, VA 22193

Dear Mr. Wardle:

Re: City of Alexandria's Comments on NRG Energy's Proposed Corrective Action Plan (CAP) for Remediating Oil Contamination Issue at the Potomac River Generating Station (PRGS) Site Located at 1400 Royal Street, Alexandria, VA

The City of Alexandria ("City") respectfully submits the following comments regarding the above referenced NRG Energy's proposed CAP for your consideration.

The City is appreciative of the Virginia Department of Environmental Quality (VDEQ) effort and thorough approach in directing the required site characterization studies and investigations that lead to the development of this CAP. Furthermore, it is reassuring to know from VDEQ assertion at the public meeting on February 3rd that the CAP is not cast in stone and subject to change pending the progress achieved and/or other unforeseen factors identified during its implementation phase.

The City finds the proposed remedial strategies to be acceptable and is comfortable with the fact that the radii of influence of these strategies cover a large area surrounding the source of contamination. The City is supportive of proceeding with immediate implementation of the proposed CAP once all the concerns expressed by regulatory and other stakeholders have been addressed satisfactorily.

NRG mentioned at the same public meeting that the proposed CAP aims at satisfying requirements from all regulatory stakeholders including the VDEQ, the National Park Service (NPS) and the District Department of Environment (DDOE). The City supports this approach and requests that VDEQ address all the concerns that are expressed by NPS and DDOE, and require NRG to develop remedial strategies that resolve these concerns to the satisfaction of these agencies and integrate them into the final CAP.

The CAP should address the impact of remedial strategies on the ecology and aquatic habitat of the Potomac River. For this purpose, it is essential to expedite the remediation process. As such, the progress toward remediation endpoints should be used to evaluate the effectiveness of each

remedial technology and the CAP should include provisions to optimize each technology and/or replace it with a better performing technology, if necessary.

The proposed CAP, in its current form, does not address the future land use at this site, which is most likely to be a mixed use of residential and commercial developments. In fact, the City plans to start developing the North Old Town Small Area Plan which includes the PRGS site during the Fiscal Year 2016 (i.e., from July 2015 to June 2016). Typically, such an effort could take 18 months to complete. Hence, the CAP should address the process of which the CAP would be modified if the future land use changed.

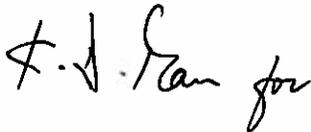
The City also requests that all equipment used for the remediation effort be designed and installed in such a way to achieve 55 dB(A) at the PRGS property lines. Also, the outdoor use of heavy equipment and trucks should be restricted to between 7 a.m. and 6 p.m. on weekdays.

The City further requests that the final CAP include a detailed schedule for progress reports and that VDEQ develop a process to keep stakeholders and concerned community updated of progress. The City is pleased to hear that VDEQ is developing a webpage for this remediation project, and encourages VDEQ to accelerate this effort.

The City thanks VDEQ for the opportunity to comment on this proposed CAP, and for its leadership in directing the remediation effort at this site.

Please contact the undersigned at William.skrabak@alexandriava.gov or by phone (703)746-4065, if you have any question regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "W. J. Skrabak for". The signature is written in a cursive, somewhat stylized font.

William J. Skrabak,
Deputy Director,
Infrastructure & Environmental Quality Division,
Department of Transportation and Environmental Services