



COMMONWEALTH of VIRGINIA
DEPARTMENT OF TRANSPORTATION

1401 EAST BROAD STREET RICHMOND, VA 23219

Stephen C. Brich, P.E.
Commissioner

April 16, 2020
By e-mail to aglaeser@lexingtonva.gov

Mr. Arne Glaeser
Director of Planning and Development
City of Lexington
300 East Washington Street
Lexington, Virginia 24450

Dear Mr. Glaeser:

The Virginia Department of Transportation (VDOT) Environmental Division has reviewed the Phase I Environmental Site Assessment (ESA) Report and Asbestos Survey Report for the Old VDOT Lexington Residency Complex located at 626 Waddell Street in Lexington, Virginia (the "Facility"). In response to these documents, VDOT offers the comments and information attached hereto as Exhibit A. In addition, attached hereto as Exhibit B are the results from a Radon Study conducted at the Facility in 2012. The results were less than or equal to 1.2 pCi/L.

The City of Lexington is free to conduct such Phase II activities as it chooses. As a general statement, however, VDOT will not address any impact or conduct any removal of materials unless it is required by a state or federal regulatory program. For example, if the City chooses to remove any ACM, the City may do so after settlement at the City's sole expense.

VDOT hopes this additional information is useful for the City of Lexington in determining the scope of its Phase II Environmental Site Assessment at the site. Should the City pursue a Phase II, VDOT reserves the right to review and approve the proposed Phase II assessment plan, observe the Phase II activities and split samples collected during the assessment. This response does not constitute a grant of access to conduct any Phase II testing unless and until the proposed Phase II assessment plan has been approved by VDOT and a Site Access Agreement has been executed between the City and VDOT. Should you have any questions about this letter, please feel free to contact me at william.ferguson@vdot.virginia.gov or by phone at (804) 225-3432.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Ferguson, P.E.", with a stylized flourish at the end.

William C. Ferguson, P.E.
Director, Capital Outlay and Facility Management

cc: Jamie Pham, VDOT (by e-mail)
Hugh Hubinger, DGS (by e-mail)

Exhibit A

VDOT Environmental Division Comments to Phase I ESA and Asbestos Reports

Phase I ESA

- Report finding - The VDEQ provided documentation indicating the current UST system is considered in temporary closure. The VDEQ has not inspected the site since this designation. Based on information obtained from the VDEQ, the facility is scheduled to be inspected in 2020. CEA recommends an assessment of the UST system to include soil sampling activities within the UST basin and adjacent to the dispenser island and gauging of the USTs to verify liquids have been removed from the USTs. ○ VDOT response - the UST system was placed into temporary closure in early 2019. At the time of temporary closure the UST system was operating in compliance with the Virginia UST Regulations.
- Report finding - CEA observed stained areas within the Pole Shed bays, Storage Shed No. 2 bays, and within the parking area currently utilized by the Rockbridge Farmer's Co-Op to store equipment. CEA recommends soil sampling activities in these areas to determine the impact to the subject site. ○ VDOT Response - The observed surface staining in the Pole and Storage Sheds was associated with oil from normal operating equipment. VDOT will evaluate whether a voluntary limited surface removal of that stained soil is warranted. The City may observe any Pole and Storage Sheds soil removal efforts, if desired. It may be prudent to delay testing those areas until any soil removal has been completed, if testing is still desired.
- Report finding - Waste liquids and materials were noted within the Fuel Storage Building, in drums adjacent to the Dispenser Island, and within the floor drain in the Truck Repair Shop. CEA recommends characterizing these liquids and materials for eventual disposal activities. ○ VDOT response – VDOT will remove any waste liquid and material in drums and in the oil-water separator to which the shop floor is drained prior to transfer. The City may observe the removal of liquids and materials from the drums and floor drains in the Truck Repair Shop, if desired. It may be prudent to delay testing those areas until the soil removal has been completed, if testing is still desired.
- Report finding - Four (4) USTs were reportedly removed from the subsurface in the mid-1980s. The steel constructed USTs were identified as a 10,000-gallon gasoline UST originally installed in 1971, a 2,000-gallon diesel UST installed in 1976, a 2,000-gallon diesel UST installed in 1951 and a 1,000-gallon kerosene UST installed in 1951. The VDEQ located no closure documentation, including soil sampling, associated with the removal activities of these USTs. CEA recommends a subsurface investigation to include soil sampling within the former UST basin to determine if the presence of these historic tanks have adversely impacted the subject site. ○ VDOT response - Prior to December 22, 1988, there were no EPA or DEQ requirements for closing USTs nor were there any requirements for assessing the site at the time of closure. As noted, in the Phase I Appendices, VDOT did install three soil borings around the UST basin that was removed in 1997. Field screening of soil samples using a Photoionization Detector did not reveal the presence of petroleum vapors.

- Report finding - One (1) HREC was identified in association with the subject property. A Tank Closure Report, dated July 21, 1997, documented the closure of one (1) 10,000-gallon gasoline UST and one (1) 10,000-gallon diesel UST. Per VDEQ guidelines, the analytical results reported for the gasoline basin soil sample, basin water sample, and dispenser island soil samples potentially indicate a release. The VDEQ approved the tank closure and did not issue the site a PC number or require corrective action.
 - VDOT response – All regulatory requirements were met associated with this closure. The soil samples collected from the UST basin were below the “clean fill standards” and the TPH soil sample beneath the UST dispenser were below the release reporting requirements. In not requiring further investigation the DEQ deemed the detections to not represent a threat to human health or the environment. Moreover, as noted in the Phase I Appendices, VDOT did install three soil borings around the UST basin in anticipation of the UST upgrade project. Field screening of soil samples using a Photoionization Detector did not reveal the presence of petroleum vapors.
- Report finding - Due to historical vehicle and equipment repair activities within the Vehicle Repair Shop, CEA recommends collecting soil gas samples from beneath the concrete slab to identify potential vapor intrusion risk.
 - VDOT response – The report did not establish an actual Recognized Environmental Condition that supports the conditions needed for a potential vapor intrusion issue at the shop. A review of the records VDOT has available does not indicate that the facility operated any solvent product or waste tanks at the shop. Likewise, a 1996 statewide survey for underground injection control (UIC) systems associated with shop floor drains determined that the Lexington Facility was in compliance as it did not have a UIC well and that shop floor drain was connected to the sanitary sewer. In addition, VDOT has implemented an Environmental Compliance Assessment program in place for greater than 15 years and the assessments did not reveal any waste mismanagement associated with the shop operations. Finally, VDOT has an Industrial Hygiene Program and there are no records on file where employees requested that an indoor air quality assessment be conducted related to indoor vapor issues. Collection of soil gas samples does not appear to be warranted.

Asbestos Survey

- Report finding - CEA recommends all ACM be handled by a properly trained and licensed asbestos abatement contractor and disposed in accordance with all pertinent local, state and federal regulations and laws.
 - VDOT response – To clarify, all ACM was determined to be in “Good” Condition and not “Friable”. Accordingly, there is no policy or regulatory requirement for VDOT to remove ACM prior to property transfer. As a point of note, there are other options for management of ACM in place that were not mentioned in the report.

Exhibit B

**Staunton District
Radon Testing 2012 - 2013**

Test ID#	Facility Name	Test Date	Result (pCi/L) Short-Term	Result (pCi/L) Long-Term	Mitigated Date	Mitigated Cost	Follow-up Result (pCi/L)	Next Test Date
4475539	Lexington Bridge Building 1	8/20/2012	1.2					
4475542	Lexington Bridge Building 2	8/20/2012	0.9					
4479169	Covington AHQ Office 1	8/20/2012	2.7					
4479170	Covington AHQ Office 2	8/20/2012	2					
4479171	Covington AHQ Office 3	8/20/2012	2.1					
4479172	Covington AHQ Shop Office	8/20/2012	1.3					
4479173	Kerrs Creek AHQ 1	8/20/2012	1.4					
4479174	Kerrs Creek AHQ 2	8/20/2012	1					
4479175	Kerrs Creek AHQ 3	8/20/2012	1.1					
4479176	Fairfield AHQ Office 1	8/21/2012	1.3					
4479177	Fairfield AHQ Office 2	8/21/2012	1.5					
4479178	Swoope AHQ Office 1	8/21/2012	3.4					
4479179	Swoope AHQ Office 2	8/21/2012	2.5					
4479180	Fishersville AHQ Office 1	8/21/2012	0.8					
4479181	Fishersville AHQ Office 2	8/21/2012	1					
4479182	Fishersville AHQ Warming Room	8/21/2012	1.3					
4479183	Verona AHQ Office 1	8/21/2012	0.7					
4479184	Verona AHQ Office 2	8/21/2012	0.5					
4479185	Verona Residency Basement 1	8/21/2012	1.2					
4479186	Verona Residency Basement 2	8/21/2012	1.3					
4479187	Verona Residency Basement 3	8/21/2012	1.6					
4479188	Harrisonburg Residency Office 1	8/21/2012	1.4					

Attention: I4753 / SHAMSI TAGHAVI / VA DEPT OF TRANSPORTATION

Kit #: 4475539 Result: 1.2 ± 0.3 pCi/l Analysis Note :
Location: 1st Floor Analyzed : 2012-08-24 at 1:00 pm
Lx Bridg Bldg 1 Started : 2012-08-20 at 2:00 pm
626 Wadell St Ended : 2012-08-22 at 3:00 pm
Lexington, VA 24450 Hours/MST% : 49 hours 7.0% 80°F

Kit #: 4475542 Result: 0.9 ± 0.3 pCi/l Analysis Note :
Location: 1st Floor Analyzed : 2012-08-24 at 1:00 pm
Lx Bridg Bldg 2 Started : 2012-08-20 at 2:00 pm
626 Wadell St Ended : 2012-08-22 at 3:00 pm
Lexington, VA 24450 Hours/MST% : 49 hours 6.3% 80°F

Kit #: 4479169 Result: 2.7 ± 0.3 pCi/l Analysis Note :
Location: 1st Floor Analyzed : 2012-08-24 at 12:00 pm
Covington Ahq 1 Started : 2012-08-20 at 1:00 pm
815 Grayson Ave Ended : 2012-08-22 at 1:00 pm
Covington, VA 24426 Hours/MST% : 48 hours 4.9% 80°F

Kit #: 4479170 Result: 2.0 ± 0.3 pCi/l Analysis Note :
Location: 1st Floor Analyzed : 2012-08-24 at 12:00 pm
Covington Ahq 2 Started : 2012-08-20 at 1:00 pm
815 Grayson Ave Ended : 2012-08-22 at 1:00 pm
Covington, VA 24426 Hours/MST% : 48 hours 5.6% 80°F

Kit #: 4479171 Result: 2.1 ± 0.3 pCi/l Analysis Note :
Location: 1st Floor Analyzed : 2012-08-24 at 12:00 pm
Covington Ahq 3 Started : 2012-08-20 at 1:00 pm
815 Grayson Ave Ended : 2012-08-22 at 1:00 pm
Covington, VA 24426 Hours/MST% : 48 hours 6.3% 70°F

Kit #: 4479172 Result: 1.3 ± 0.3 pCi/l Analysis Note :
Location: 1st Floor Analyzed : 2012-08-24 at 12:00 pm
Covington Shop Office Started : 2012-08-20 at 1:00 pm
815 Grayson Ave Ended : 2012-08-22 at 1:00 pm
Covington, VA 24426 Hours/MST% : 48 hours 7.0% 80°F
