



DEPARTMENT OF TRANSPORTATION AND ENVIRONMENTAL SERVICES  
Office of Environmental Quality  
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May 9, 2016

Frank Craighill  
Senior Associate  
CityInterests, L.L.C.  
2900 K Street NW, Suite 401, Washington, DC 20007

Re: City's Comments on the Site Characterization Study Work Plan for Former  
Robinson Terminal North (RTN), 500/501 Union St, Alexandria, VA

Dear Mr. Craighill:

This letter serves as the City's official comments on the above subject report. While for the most part the City is comfortable with the content of the report, it is felt that an addendum would be required to meet the City's requirements.

While the report notes that the 500 Union St. parcel was formerly part of the R.H. Bogle Chemical plant, there is scant mention of the past chemical compounding operations and subsequent investigation and remediation of arsenic (As) contamination associated with this facility. Bogle manufactured herbicides on this property from the 1930's until 1973/4, when high concentrations of As were identified in the soil within and downgradient from the Bogle property. The City of Alexandria believes that a thorough characterization of this property is necessary due to both the past arsenic contamination and the remedial actions taken in response to the contamination. The area within the perimeter of the current RTN warehouse property was not extensively investigated at the time of the western RTN warehouse construction.

Pursuant to the City of Alexandria's zoning requirements to characterize the extent of known contamination, we request that additional samples be taken to fill in data gaps on this site. Due to the data provided within the 1976 Dames and Moore report, including documented hot spots of arsenic contamination, there is potential for high levels of arsenic contaminated soil throughout this property. The City of Alexandria requests that additional samples be taken to characterize the soils beneath the slab and to better define the extent of contamination in locations in between the arsenic concentration contours of the previous investigations, especially on the northwest side of 500 Union Street.

Furthermore, in 1984, The United States Environmental Protection Agency (USEPA) investigated locations along the Alexandria waterfront including Oronoco Bay in the area just north of the current Robinson Terminal North and Bogle chemical site as part of the National Dioxin Strategy program. The EPA Final report concluded that dioxin was not present in surface soils at any of the locations sampled. Although trace levels were detected within sediments of Oronoco Bay, the EPA determined that there is no indication of human exposure to dioxin. Elevated arsenic concentrations were detected in 3 locations, all in the vicinity of the former Bogle site. However, the RTN warehouse was built before this study was carried out and therefore no characterization was possible for the soils beneath the warehouse slab. Thus, the City requests that CityInterests carry out limited sampling for dioxin within the site to confirm that dioxin is not an issue at this site.

In summary, the City requests that CityInterests submit an addendum to the subject report to add sampling locations to further characterize the extent of site contamination. Specifically, we request that the addendum addresses the following:

1. A summary of past environmental issues related to the Bogle chemical plant.
2. Limited sampling for dioxin shall be carried out within the site (i.e., under the warehouse slab; downgradient from where the rail cars were washed out) to confirm that dioxin is not an issue at this site.
3. The City of Alexandria's zoning ordinance requires the environmental site assessment shall clearly describe, map, or explain the known areas of contamination. Thus, additional samples shall be taken to better define the extent of contamination in locations in between the arsenic concentration contours of the previous investigations, especially on the northwest side of 500 Union Street where high concentrations of As might exist. The objective for this further characterization is to establish a rough estimate of the volume of contamination at this stage of the development.

Should you have any questions, please contact me at 703-746-4073.

Sincerely,



William Skrabak  
Deputy Director, Infrastructure and Environmental Quality

C: Yon Lambert, Director, T&ES  
Meade Anderson, VRP program Manager, VDEQ  
Vince Madden, VRP Project Manager, VDEQ