

April 28, 2022



Nazmul Haque, PhD, PE
Environmental Engineer
Underground Storage Tanks Branch
Department of Energy & Environment (DOEE)
Government of the District of Columbia
1200 First Street, NE, 5th Floor
Washington, DC 20002

Dear Dr. Haque,

As directed by DOEE in the December 10, 2020 directive, WMATA's contractors (Clark and PSI) have completed the Comprehensive Site Assessment for Northern Bus Garage, 4615 14th Street, NW, as outlined in the workplan. The report is enclosed with this letter. Exceptions to the planned activities are documented in the report. I propose to meet with DOEE representatives, after you have reviewed the report.

PSI identified the following areas of concern:

- Petroleum soil contamination and petroleum groundwater contamination (See Figures 6 and 7 of the report), including some detections above Tier I levels. Past investigations show petroleum contamination in soil and groundwater south of Buchanan (See Figures 1 and 2 of the Work Plan), although it is not clear these detections originated from the Northern Bus Garage site. Petroleum contamination did not appear to cross Arkansas Avenue in the current sampling.
- Chlorinated solvent groundwater contamination (See Figure 7 of the report). Past investigations have identified chlorinated solvent contamination in soil and groundwater south of Buchanan Street (See Figures 1 and 2 of the Work Plan), although it is not clear these detections originated from the Northern Bus Garage site. Chlorinated solvent contamination did not appear to cross Arkansas Avenue in the current sampling.
- An elevated lead detection was identified in a soil sample collected east of Arkansas Avenue (from a sample in public space). The project team has not identified any linkage to the Northern Bus Garage site.
- Light non-aqueous phase liquid (LNAPL) was observed during the most recent investigation in the vicinity of previously-observed petroleum contamination.
- No dense non-aqueous phase liquid (DNAPL) was observed.

Based on field observations, laboratory analytical results, and past reports, WMATA proposes the following response activities:

**Washington
Metropolitan Area
Transit Authority**

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Washington, DC 20024
202-962-1234

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*A District of Columbia,
Maryland and Virginia
Transit Partnership*

1. Removal and disposal of underground structures that served as sources for the contamination, including oil/water separators, underground storage tanks, and associated piping.
2. Removal (on a periodic and continuous basis) of LNAPLs from MW-003 until the substance is no longer observed in the monitoring well.
3. During demolition activities, excavation and testing of contaminated soils down to the base of excavation. Contaminated soils will be segregated, tested, and sent to a facility capable of managing the type of contamination observed.
4. Install a PVC air collection system with stub up during sub grade construction.
5. Install a 15-mil polyethylene vapor barrier above subgrade below concrete.
6. Any contaminated groundwater removed from the site will be treated before release or moved to a facility for treatment. A permanent monitoring/extraction well will be installed in the vicinity of the free product.
7. Regular monitoring.
8. Discussion about how to address chlorinated solvent contamination.

The lead detection observed in a sample collected from public space is believed to be unrelated to past activities at the carbarn or bus garage, since the sample was collected offsite and at depth. Likely, the detection is a remnant from lead water service lines used throughout the region.

I will reach out to you to discuss next steps. I can be reached at (202) 400-1550 or jashe@wmata.com.

Sincerely,

James Ashe
Senior Program Manager

ENCLOSURES: As stated.