



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

**SUBJECT:** Washington – Dulles International Airport  
Dulles, VA  
EPA ID: VA6690500909  
Long-term Stewardship Assessment

**DATE:** 08/18/2020

**FROM:** Kurt Kochan  
Project Manager

**TO:** Long-term Stewardship File for Washington – Dulles International Airport  
VDEQ Office of Remediation Programs

### Remedy Review Summary:

DEQ's Final Decision (August 24, 2016) required Washington – Dulles International Airport (Dulles) to record a Land Use Control Implementation Plan (LUCIP) prohibiting groundwater use for potable purposes, requiring groundwater monitoring, restricting the entire property to non-residential use (unless it is demonstrated to DEQ and EPA that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy, and DEQ and EPA provides prior written approval for such use), drafting and implementing a Soil Management Plan (SMP), and evaluating any new buildings near known Areas of Contamination (AOC) or Solid Waste Management Units (SWMU) for the potential for vapor intrusion from contaminants of concern. Annual compliance reporting to DEQ is required. The LUCIP was recorded into the Dulles Master Plan of May 22, 2017.

### Document Review:

The latest annual groundwater monitoring report dated January 2020 and received on February 20, 2020, states, "...BTEX and MTBE concentrations were below the MCLs and drinking water advisories, respectively, at the time of sampling." Further, based on discussions with the Dulles, the LUCIP and SMP are included in the Master Plan for review for Dulles employees and contractors.

The most recent available aerial image of the Facility (10/2019, Google Earth) indicates that the LUCIP area appears consistent with previous uses with no evidence of any new structures or development in the areas of any known AOCs or SWMUs. The LUCIP is available through EPA's webpage for the Facility along with EPA's Statement of Basis for Final Remedy. The attached Table identifies the LUCIP restrictions. The LUCIP applies to the entire Facility.

**Background:**

The Facility is located on approximately 11,830 acres of fenced, improved land in western Fairfax and southeastern Loudoun County, Virginia. The Facility is owned by the United States Government acting through the Federal Aviation Administration (FAA) and leased by the Metropolitan Washington Airports Authority (MWAA). The Facility is a civilian aviation facility for domestic and international flights. Airport activities include those managed by MWAA and those managed by airport tenants, including airlines, car rental facilities, and hotels. In 1993, the U.S. Environmental Protection Agency (EPA) contracted a RCRA Facility Assessment of the Facility.

Hazardous waste generating activities conducted at the Facility include facility maintenance, vehicle repair, paint shop and bulk petroleum storage. Wastes generated at the Facility include maintenance of the oil/water separators, used antifreeze, batteries, parts washer solvents and solvent rags, fuel and fuel filters, paint wastes, used paint booth filters and used fluorescent light bulbs. The Facility has been categorized as a large quantity generator (LQG) of hazardous waste in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR) and RCRA Regulations.

Investigations showed that Facility operations impacted groundwater in discrete areas with BTEX and MTBE near the bulk storage fuel operations and with 1,1-DCE, 1,2-DCE and 1,1, 2-TCE around the former fire training pit. These detections are now all below applicable MCLs. Soil samples from the Facility did not exceed DEQ VRP standards. However, because closures at the former UST locations and other AOCs did not analyze for a full suite of potential COCs, DEQ required land and groundwater use restrictions for the entire Site in a LUCIP.

**Documents Reviewed:**

Washington – Dulles International Airport EPA Fact Sheet webpage

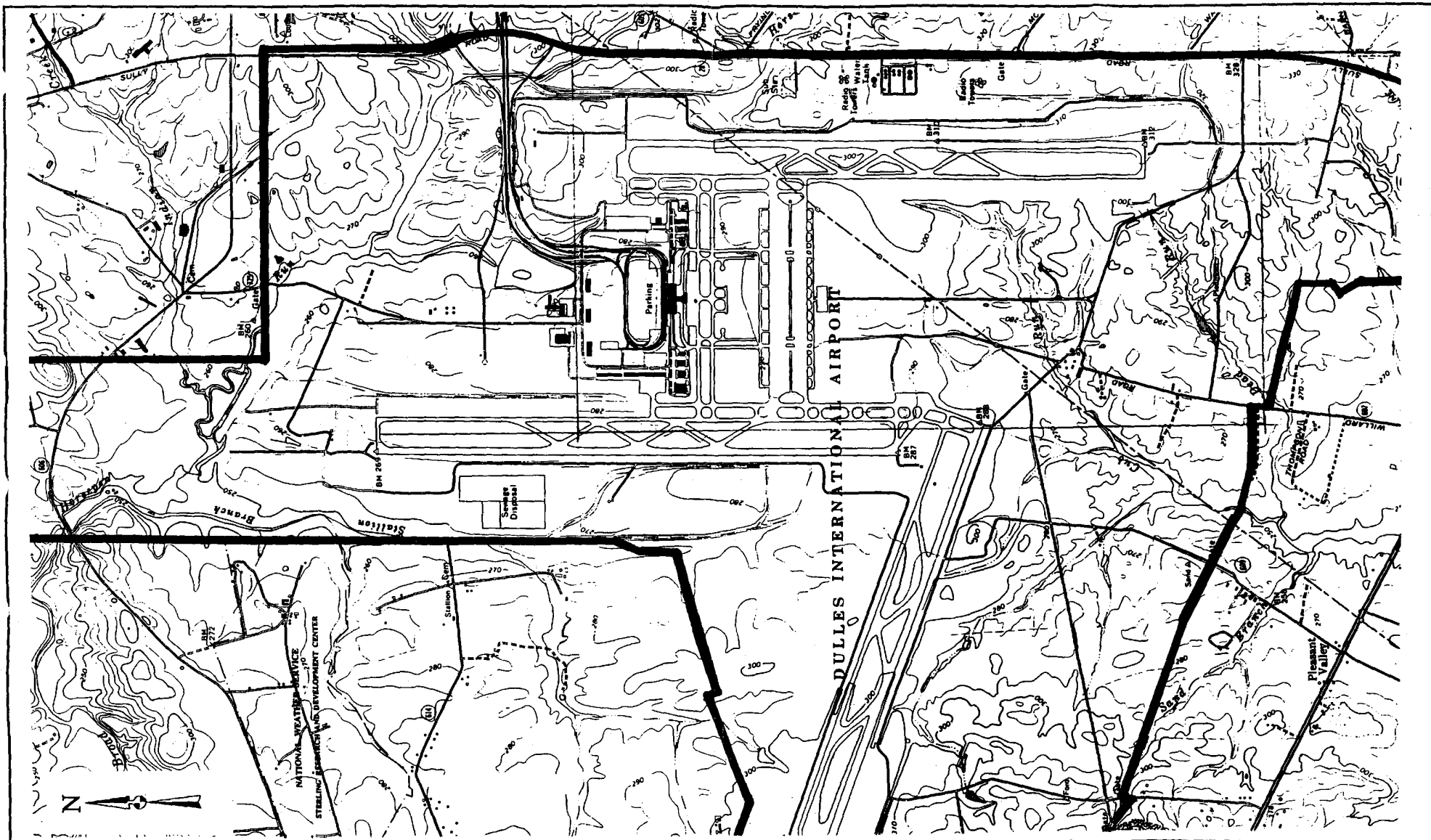
(<https://www.epa.gov/hwcorrectiveaction/hazardous-waste-cleanup-washington-dulles-international-airport-dulles-va>), which includes:

DEQ Statement of Basis for Remedy (August 2016), Final Decision and Response to Comments (August 24, 2016)

LUCIP, recorded 2/20/2017

2019 Annual Groundwater Monitoring Report, dated January 2020 (not listed on EPA Fact Sheet webpage)

Google Earth image, 10/2019



CDM FEDERAL PROGRAMS CORPORATION  
 a subsidiary of Camp Dresser & McKee Inc.

2000 1000 0 2000 4000



SCALE: 1" = 2000'-0"

7.5 MINUTE USGS TOPOGRAPHICAL QUADRANGLE  
 OF HERNDON, VIRGINIA  
 PHOTO REVISED 1983  
 DULLES INTERNATIONAL AIRPORT SITE TOPOGRAPHY PLAN

FIGURE 2-2

Institutional Control/Engineering Control  
 Corrective Action Remedy Summary

|  |     |    |         |   |
|--|-----|----|---------|---|
| Facility Name                                    |     |    |         |   |
| Address  |     |    |         |   |
| EPA ID Number                                    |     |    |         |   |
| Are there restrictions or controls that address: | Yes | No | Area(s) | Description of restrictions, controls and mechanism |
| Groundwater Use                                  |     |    |         |   |
| Residential Use                                  |     |    |         |   |
| Excavation                                       |     |    |         |   |
| Vapor Intrusion                                  |     |    |         |   |
| Capped Area(s)                                   |     |    |         |   |
| Other Engineering Controls                       |     |    |         |   |
| Other Restrictions                               |     |    |         |   |