



*COMMONWEALTH of VIRGINIA*

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**SUBJECT:** VDOT Culpeper District Complex  
1601 Orange Rd, Culpeper, VA 22701  
EPA ID: VAD980715064  
Long-term Stewardship Assessment

**DATE:** 09/09/2020

**FROM:** Vrushali Gandhi  
RCRA CA Project Manager

**TO:** Long Term Stewardship File for VDOT Culpeper District Complex  
VDEQ Office of Remediation Programs

**Remedy Review Summary:**

DEQ's Final Corrective Active Remedy Decision (Statement of Basis dated June 13, 2014) required the facility to excavate the impacted soil at two Solid Waste Management Units (SWMUs 8 and 9), conduct long-term groundwater monitoring, and implement institutional and engineering controls. The controls include limiting groundwater use beneath the property, requiring vapor intrusion mitigation measures or alternate demonstration that vapor intrusion is not occurring for any newly constructed buildings within 100 feet of groundwater containing chlorinated solvents, residential use prohibition (SWMU-8 only), and maintenance and monitoring of the cap for SWMU-8. Annual compliance reporting to DEQ is also required as part of the final remedy.

On Jan 29, 2018, VDOT Culpeper District Complex recorded an environmental covenant with the Culpeper Circuit court to establish land use controls.

**Document Review:**

The latest annual groundwater monitoring report dated (April 14, 2020) was reviewed by DEQ, the report indicates that groundwater annual monitoring was conducted in accordance with the Post-Closure Care Permit. The results were consistent with the previous monitoring events and the analytical data indicates that the VOC plume is attenuating.



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The most recent aerial image of the Facility (Google Earth Pro™ October 2017) shows that property use has not changed since the final remedy/covenant implementation and has continued its use.

The Environmental Covenant is available on EPA's webpage for the Facility. The covenant lists the current property Owner/Grantor and Holder/Grantee as Commonwealth of Virginia, Department of Transportation (VDOT). Covenant restrictions are summarized in the Table below.

**Background:**

The VDOT Culpeper District Headquarters is located in the Town of Culpeper, Culpeper County, Virginia. The Facility is owned and operated by the Virginia Department of Transportation (VDOT), and is comprised of several office buildings, garages, and various storage areas/buildings situated on a 52.8-acre parcel of land. The VDOT Culpeper District headquarters facility has been in operation since the late 1930's. Various activities conducted or historically conducted at the site include storage/maintenance of VDOT vehicles, storage of materials, sign production and refurbishing, and various administrative/dispatch services.

On September 14, 2005, the facility was issued a Hazardous Waste Management Post-Closure Care Permit (PCC Permit), which included post-closure care, groundwater compliance monitoring, and site-wide corrective action (CA) requirements. A Statement of Basis was recorded in June 13 2014. The final remedy for the facility emphasizes source control through excavation of impacted soils at SWMU 8 and 9; continued groundwater monitoring and the implementation of institutional controls (ICs) listed in table 1 below. The polygon depicting the polygon representing SWMU-8 is in figure 1 below. VDOT completed excavation activities and confirmation sampling for SWMUs 8 and 9 in November 2016.

**Documents Reviewed:**

EPA Region 3 Corrective Action Sites Webpage, EPA Facility Fact Sheet  
Environmental Covenant (01/29/2018), DEQ Statement of Basis (06/13/2014)  
2019 Annual Corrective Action Program Groundwater Monitoring Report (April 14, 2020)  
Google Earth Pro™ (October 19, 2017)

Figure 1: SWMU 8 Polygon

SWMU 8

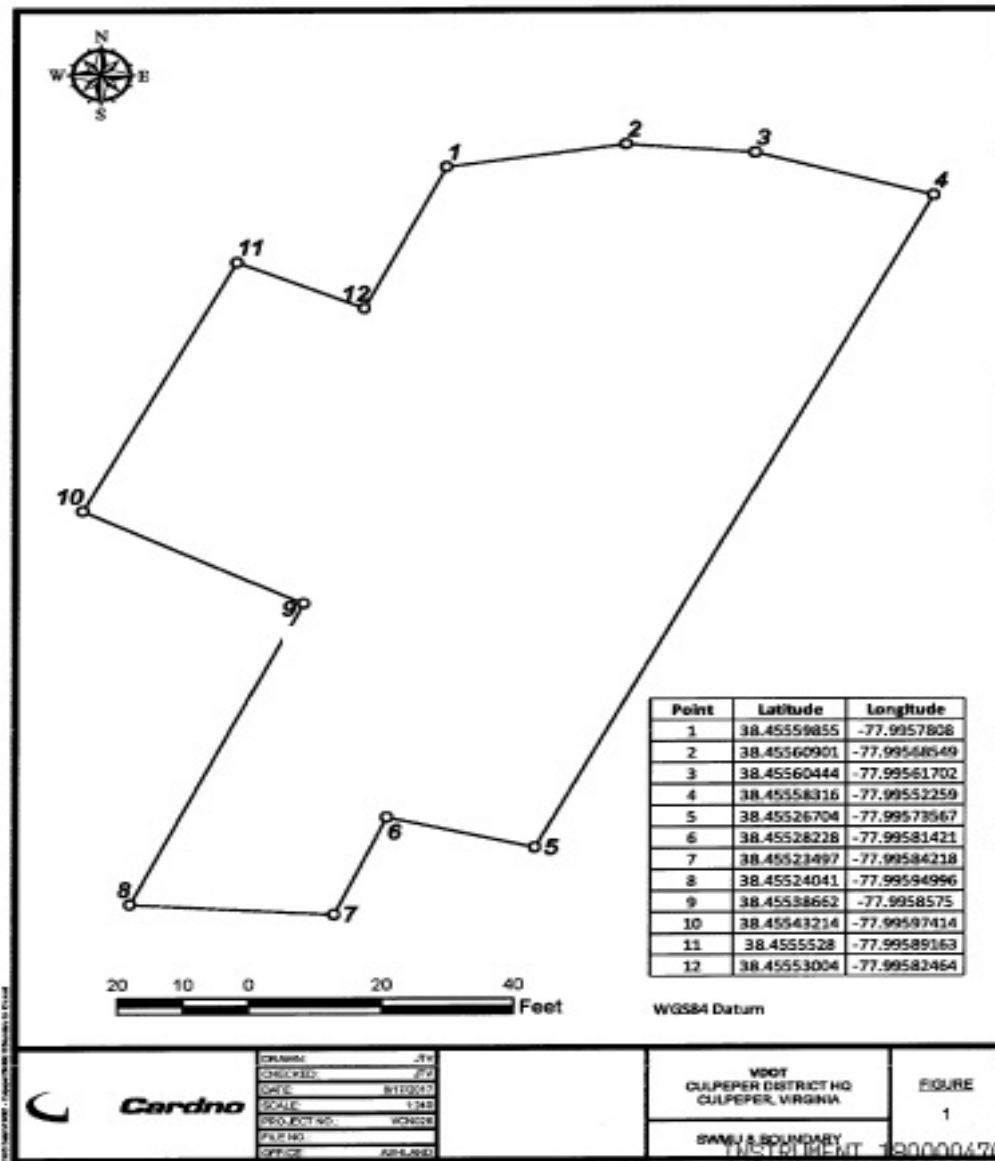


Table 1: Institutional Control/Engineering Control  
Corrective Action Remedy Summary

Facility Name	VDOT Culpeper District Complex			
Address	1601 Orange Rd, Culpeper, VA 22701			
EPA ID Number	VAD980715064			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use	X		Entire Site	Prohibit the use of groundwater beneath the property for potable and sanitary purposes to support selected corrective measures.
Residential Use	X		SWMU-8	SWMU-8 shall not be used for residential purposes or for children's daycare facilities, schools, or playground purposes.
Excavation	X		SWMU-8	Any earth moving activities within SWMU-8 shall comply with the facility's Materials Management plan, dated Dec 12, 2017.
Vapor Intrusion	X		Entire Site	A VI control system (design approved by agency), shall be installed in any new structures, within 100 ft of groundwater monitoring well exhibiting concentrations of VOC exceeding GPS, unless demonstrated that no human health risk exists.
Capped Area(s)	X		SWMU- 8	IC recorded that requires inspection and maintenance of the cap over SWMU-8
Other Engineering Controls		X		
Other Restrictions		X		