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Original Amount:

New Amount:

County: ARLINGTON

**Fees**

(038) State Grantor: \$0.00

(039) State Tax: \$0.00

(145) State Library: \$0.00

(301) Clerk's Fee: \$0.00

(106) Technology Fee: \$0.00

(035) Open Air Preservation Fee: \$0.00

(036) Processing Fee: \$0.00

(213) Arlington Co. Tax: \$0.00

(212) Arlington Co. Tariff: \$0.00

(220) Arlington Grantor: \$0.00

(214) Falls Church Tax: \$0.00

(222) Falls Church Tariff: \$0.00

(223) Falls Church Grantor: \$0.00

(414) Arlington Co. Regional Congestion Relief Fee: \$0.00

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Arlington County, Virginia  
Clerk of the Court's Office

This certificate annexed constitutes the Clerk's endorsement required by sections 17-59, 17-79 and 58.1-802 of the code of Virginia.

Paul Ferguson  
Clerk

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4/24/2014

Tax Map or GPIN No.: 29014011

Prepared by and Return to:

Arlington County Real Estate Bureau  
2100 Clarendon Boulevard, Suite 800  
Arlington County, Virginia 22201

Remediation Program Site ID #: VAD988204921

This instrument is exempt from taxation pursuant to §58.1-811 A 3 & C 4 of the Code of Virginia

## UECA ENVIRONMENTAL COVENANT

This environmental covenant is made and entered into as of the 27th day of February, 2014, by and between THE COUNTY BOARD OF ARLINGTON COUNTY, VIRGINIA, a body politic, whose address is 2100 Clarendon Boulevard, Suite 300, Arlington County, Virginia, 22201 (hereinafter referred to as the "Grantor" or "Owner"), and the THE COUNTY BOARD OF ARLINGTON COUNTY, VIRGINIA, a body politic (hereinafter referred to as the "Grantee" or "Holder"), whose address is 2100 Clarendon Boulevard, Suite 300, Arlington County, Virginia, 22201. The VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY, whose address is 629 E. Main Street, Richmond, Virginia 23219, (hereinafter referred to as the "Agency") also joins in this environmental covenant.

This environmental covenant is executed pursuant to the Virginia Uniform Environmental Covenants Act, § 10.1-1238 et seq. of the Code of Virginia (UECA). This environmental covenant subjects the Property identified in Paragraph 1 to the activity and use limitations in this document.

1. **Property affected.** The property affected ("Property") by this Environmental Covenant is the Arlington County Equipment Division Trades Center, located at 2701 S. Taylor Street, Arlington, Virginia, and more particularly described as follows:

Parcel "B", Property of The County Board of Arlington County, as more particularly shown and described on the Plat attached to the Deed of Resubdivision recorded in Deed Book 3743 at Page 2778 among the land records of Arlington County, Virginia. Plat is attached as exhibit "B"

2. **Description of Contamination & Remedy.**

a. The administrative record for the environmental response project reflected in this UECA environmental covenant is entitled Arlington County Equipment Division (Trades Center), Arlington, Virginia, EPA ID No. VAD988204921", and is located at 629 East Main Street, Richmond, Virginia 23219.

b. **Summary of Statement of Basis:**

**Background:** The Arlington County Equipment Division (Trades Center) is a 42-acre continued use facility owned and operated by Arlington County located at the intersection of South Arlington Mill Drive and South Taylor Street in Arlington, Virginia. Operations at the Trades Center began in the 1950's. The Facility includes South Taylor Street, 28th Street South, and

(39) + 2 PLAT

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29th Street South. The Trades Center is used for light industrial operations and consists of municipal office buildings and facilities used for various county functions, which include automotive vehicle repair, vehicle storage, carpentry, chemical storage, parts and equipment storage, vehicle washing, vehicle refueling, fire training, equipment repair, and earth products handling and recycling.

Hazardous waste generating activities conducted at the Facility include facility maintenance, vehicle repair, and small engine repair. Highway line painting was performed by the Facility from 1971 to 1994, after which line painting was subcontracted to a private contractor. Wastes generated at the Facility include antifreeze, batteries, brake cleaners, and parts washer solvents and fluids. Currently citrus based cleaners are used in parts washers. Since 1998, the Trades Center has been categorized as a conditionally exempt small quantity generator of hazardous waste in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR) and RCRA Regulations.

There are eight main facilities that comprise the Trades Center, which include:

- Equipment Bureau (vehicle maintenance)
- Water, Sewer, and Streets Bureau (sewer maintenance, road construction and repair, salt, sand, snow removal, and related oversight)
- Police Impound Lot (vehicle storage)
- Traffic Engineering Operations
- Solid Waste Bureau (recycling and trash services, brush/leaf collection, street sweeping, rock crushing, earth products recycling yard)
- Arlington Public Schools (oversight of warehouse and school bus parking)
- Parks, Recreation, and Cultural Resources
- Fire Training Academy (Instructional center and outside training areas)
- In addition to the above, the Facility also maintains a fuel island with four underground storage tanks (UST), three compressed natural gas tanks, two above ground storage tanks containing liquid propane, a vehicle wash station, and a two level parking garage.

**Summary of Environmental Investigations:** Based on a review of files maintained by the DEQ and EPA Region 3, Tetra Tech EC, Inc. (EPA contractor) in consultation with EPA identified a number of solid waste management units (SWMU) and areas of concern (AOC) at the Trades Center. Environmental investigations were conducted on SWMUs and AOCs identified at the Facility and cleanup activities focused on the following;

- SWMU 4 - Former Traffic Engineering Storage Yard
- SWMU 5 - Former Equipment Yard Soil Pile
- SWMU 6 - Former Traffic Engineering Facility Building (Container Storage Area)
- SWMU 7 - Former USTs
- SWMU 8 - Equipment Bureau Fuel Island-Current Gasoline and Diesel USTs
- SWMU 9 - Former Maintenance Building
- AOC 2 - Fire Training Academy Area
- Site Wide Groundwater

Environmental investigations and cleanup activities at the Facility were performed in accordance with closure standards of the Virginia Hazardous Waste Management Regulations (VHWMR), the Leaking Underground Storage Tank (LUST) Program, and the Corrective Action program. Specifically, SWMUs 4, 5, and 6 were investigated and closed in accordance with the VHWMR, SWMUs 7, 8, and 9 were investigated and closed under the LUST program, and AOC 2 and site wide groundwater were investigated under Corrective Action, which also included a re-evaluation of SWMUs 7, 8, and 9. The Administrative Record (AR) maintained by DEQ contains detailed documents regarding the investigations, cleanup activities, and conclusions provided below.

**VHWMR Closure Activities:** On April 6, 1998, the Trades Center entered into a Consent Order with the DEQ to correct violations of the VHWMR observed during inspections from 1994, 1996, and 1997 including improper management, record keeping, reporting, and permitting requirements associated with storage, treatment, and disposal of toluene, paint thinner, and waste paint at SWMU 6, the Traffic Engineering Facility. The Traffic Engineering Facility also includes SWMUs 4 and 5, the storage yard and equipment yard soil pile respectively, at which toluene, paint thinner, and waste paint were improperly disposed. The Order required that the noted violations be corrected and that the Facility demonstrate "clean closure" for each of the SWMUs.

The DEQ subsequently approved closure plans provided by the Facility, initiating closure activities at SWMUs 4 and 5. In order to demonstrate clean closure, activities included the removal of waste materials, excavation of contaminated soil, confirmatory soil sampling and analysis, monitoring well installation, and implementation of a groundwater monitoring program. Clean closure of unsaturated soils was approved by DEQ on October 12, 1999. On February 22, 2002, the DEQ approved clean closure of soil and groundwater for SWMUs 4, 5, and 6 in accordance with the approved Closure Plan and the VHWMR.

**LUST Program Cleanup Activities:** LUST Program cleanup activities were performed at the Facility at SWMUs 7, 8, and 9, which are adjacent to each other on-site and include the former USTs, fueling island, and former maintenance building, respectively. Beginning in 1990, the Trades Center removed twelve USTs and installed 4 new 12,000 gallon USTs at SWMU 7, constructed a fueling station at SWMU 8, and addressed petroleum contamination at SWMU 7, SWMU 8, and SWMU 9, which was a hydraulic fluid release that occurred from underground hydraulic lift pits located in the former maintenance building. The cleanup activities associated with these areas were performed under Pollution Complaint No. PC1991-0022 issued by the DEQ.

The USTs at SWMU 7 were used for storage of unleaded gasoline, diesel fuel, and motor oil. During excavation activities, free product and contaminated soil were observed just beneath the asphalt. Subsequently, 2,500 cubic yards of soil were excavated and transported off-site for disposal. Samples collected of the excavated soils contained total petroleum hydrocarbon (TPH) concentrations ranging from 792 mg/kg to 4,350 mg/kg and concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX) ranging from 196 mg/kg to 512 mg/kg.

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The Initial Abatement Report following excavation and UST removal activities indicated that contamination was present in the up gradient and down gradient directions, but noted that further excavation was not possible. Based on this, a site investigation was conducted. The investigation included the advancement of direct push soil borings, soil sample collection, subsequent installation of groundwater monitoring wells, and groundwater sample collection. Results of the investigation indicated that TPH, volatile organic compounds (VOC) including BTEX, and lead were detected in soil and groundwater in a limited area around the excavation and that free product was observed in the up gradient monitoring well (MW-1).

Based on results of the investigation, the Trades Center conducted a Site Characterization investigation in 1993, during which a hydraulic fluid release from underground hydraulic lift pits was identified at SWMU 9. The cleanup activities associated with SWMU 9 included monitoring well installation, product recovery, groundwater monitoring, and installation and operation of a groundwater pump and treat system. Product recovery began in 1994 and a groundwater pump and treat system was installed in 1999 as the long term corrective measure.

In 2001, the system was modified to include 8 additional extraction wells and was operated until 2004. Subsequent to system shutdown in 2004, groundwater monitoring and passive product recovery continued to be conducted quarterly. Concurrent with these activities in 2002, a contractor made repairs to a cracked overspill container at SWMU 8 and observed evidence that a release of diesel fuel had occurred. In response, the Facility excavated soil and found that an underground secondary containment line had been improperly installed. Repairs to the line were made and subsequent monitoring and corrective measures were addressed under pollution complaint number PC#2002-3198. Subsequently, on June 29, 2004 the DEQ Northern Regional Office issued correspondence to the Facility stating that the petroleum contamination case associated with PC#2002-3198 was closed.

Groundwater level measurements, free-phase product measurements and recovery in wells and the hydraulic lift pits, and groundwater monitoring were conducted at these SWMUs until April 2013. In 2012, the Facility and the DEQ conducted a case evaluation and collectively determined that corrective measures had reduced free-phase product and dissolved phase concentrations of petroleum related compounds to levels that do not represent an identified risk to human health and the environment under the current use of the site. In addition, the Facility will continue to address these compounds in accordance with the EPA's Corrective Action Program to meet objectives for future use. Therefore, on April 9, 2013 the DEQ Northern Regional Office issued correspondence to the Facility stating that the petroleum contamination case associated with PC#1991-0022 was closed.

**Corrective Action Program Activities:** In 2011, the Facility conducted a Phase I RCRA Facility Investigation (RFI) to evaluate environmental impacts from SWMUs and AOCs identified during the initial RCRA site visit that was performed on October 30, 2008 by EPA and DEQ. The investigation was performed in accordance with a work plan approved by the DEQ and focused primarily on the areas listed above including site-wide groundwater. The investigation consisted of soil boring advancement, monitoring well installation, and collection of soil and groundwater samples for chemical analysis volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs). Soil

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borings were advanced and monitoring wells were installed at SWMUs 7, 8, 9, and 10 (Equipment Bureau Oil USTs), AOC 2 (Fire Training Area), and at areas down gradient adjacent to the facility's property boundary. The soil borings and monitoring wells were installed in order to collect surface and subsurface soil samples and groundwater samples. Monitoring wells were installed in lieu of soil borings in several locations in anticipation of implementing a groundwater monitoring program after completing the investigation.

Soils The results of the soil samples collected indicate that VOCs and PCBs were not detected above residential Regional Screening Levels (RSLs) for direct contact, which are EPA's conservative human health risk-based screening criteria. However, five polynuclear aromatic hydrocarbons (PAHs) exceeded residential RSLs for direct contact in one location (SB-R-01), which is in vicinity of SWMU 7. Two of these PAHs, benzo(a)pyrene and dibenz(a,h)anthracene, exceeded industrial RSLs for direct contact but are within the EPA's acceptable risk range of  $10E-6$  to  $10E-4$ . Results for the SB-R-01 location also indicated that the PAHs present in the surface soil were not detected above method detection limits in the subsurface soil. In addition, soil results indicated that arsenic and total chromium exceeded residential RSLs for direct contact in the majority of the soil samples collected. The maximum arsenic concentration observed was 6.2 mg/kg in surface soil at MW-R-07 and MW-R-08 and the maximum total chromium concentration observed was 37 mg/kg in surface soil at MW-R-02.

In addition to total chromium, the Facility analyzed five of its total chromium samples for chromium VI to evaluate the overall levels present at the site. Results indicated that chromium VI was detected at a concentration of 1.6 mg/kg in subsurface soil at AOC-2 as indicated by soil boring SB-R-06 at a depth of 2-4 feet below ground surface (ft bgs), which is above residential RSLs for direct contact, but below industrial RSLs. Chromium VI was not detected above method detection limits in the remaining four samples.

In 2012, the Facility redeveloped AOC-2, the fire training area, which included soil removal (see section AOC-2 Fire Training Area below). Therefore chromium VI at AOC-2 has been addressed and no further evaluation is necessary. In addition, the concentrations of arsenic and total chromium observed across the remainder of the Facility are in line with published regional background concentrations. Therefore further evaluation of arsenic and total chromium is not required.

Finally, soil results were screened using site screening levels (SSLs) for soil to groundwater transfer. SSLs used for screening were based on a dilution attenuation factor of one (DAF-1) and twenty (DAF-20). Screening results indicated that several VOCs, SVOCs, and metals exceeded DAF-1 SSLs. The majority of DAF-1 SSL exceedances for VOCs and SVOCs were due to the fact that screening levels were lower than method detection limits for those constituents. A number of these VOCs and SVOCs also exceeded DAF-20 SSLs for the same reason. Therefore groundwater results site wide were evaluated with respect to the SSL screening process.

Based on the results of the soil screening process including the transfer to groundwater screening process, institutional controls that restrict the residential use of the property and that require a demonstration of no unacceptable risk to human health and the environment when disturbing

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soils are required as part of the final remedy. In addition, the Facility will continue groundwater monitoring in accordance with an approved Groundwater Monitoring Plan.

Groundwater. Groundwater was sampled from a total of eighteen locations site-wide, sixteen of which were permanent monitoring well locations that were either existing or installed specifically for this investigation. Monitoring wells were installed up gradient of SWMUs 7, 8, 9, and 10. Monitoring wells were also installed inside of SWMU 9 to evaluate groundwater beneath the former equipment building and wells were installed down gradient of the Facility adjacent to the property boundary. The newly installed monitoring wells were sampled concurrent with existing wells located in SWMUs 7 and 8 during the investigation.

Groundwater results indicate that VOCs, SVOCs, and metals were detected above drinking water standards, namely Maximum Contaminant Levels (MCLs) or tap water RSLs for constituents that do not currently have an MCL. MCLs are promulgated under 40 CFR 141, pursuant to Section 1412 of the Safe Drinking Water Act (SDWA), 42 USC Section 300 ug-1. VOCs detected above drinking water standards were limited to petroleum related constituents benzene, ethylbenzene, MTBE, and isopropylbenzene in SB-R-04 and MW-2. Groundwater samples were analyzed for naphthalene via EPA SW-846 Method 8260B and 8270. Based on this naphthalene was detected above its tap water RSL in six of the eighteen sample locations, including SB-R-02. 2-Methylnaphthalene was the only other SVOC/PAH detected above standards and is limited to the SB-R-02 and MW-37 locations. Arsenic was detected at a concentration of 13 ug/l at SB-R-02 and lead was detected at concentrations of 210 ug/l and 28 ug/l at SB-R-02 and MW-R-01 respectively. All other detections of metals in groundwater were below drinking water standards.

In addition to drinking water standards, groundwater results were screened using conservative risk based levels for groundwater to vapor transfer in efforts to evaluate the potential for vapor intrusion (VI) under current use and anticipated future use of the property. Screening results indicate that several VOCs and naphthalene exceed residential and industrial groundwater to indoor air VI screening criteria. Constituents that exceed industrial VI screening criteria primarily include benzene, ethylbenzene, xylenes, and naphthalene and were observed primarily at SB-R-04 and at MW-2. No buildings or totally enclosed structures are located within reasonable proximity of where these results were observed, greatly limiting or eliminating the potential for vapor intrusion. The Facility is currently used for industrial purposes and the anticipated future use of the property is industrial. Therefore it is not necessary to investigate potential vapor intrusion any further under the current use of the property.

Groundwater results indicate that there is no contiguous groundwater contaminant plume present at the Facility. Results indicate that contaminant detections in groundwater are sporadically located within the center portion of the facility (SWMU 7, 8, and 9), which are not indicative of any on-going source area(s), and represent residual contaminants from historical releases that have been cleaned up previously under the LUST program. It is anticipated that the presence of these contaminants will dissipate over time, ultimately meeting the Corrective Action objectives.

Based on the results of the groundwater screening process and evaluation, institutional controls that restrict the use of groundwater beneath the property and that require the implementation of a groundwater monitoring program in accordance with an approved Groundwater Monitoring Plan

are required as part of the final remedy. The final remedy also requires a Vapor Intrusion Remedy Plan, which requires installation of vapor barriers or demonstration of no unacceptable risk due to VI in any newly constructed and fully enclosed buildings or if the use of the property or buildings were modified in such a way that vapor intrusion could become a risk. These plans will remain in place until groundwater Corrective Action objectives are met and the facility can demonstrate that vapor intrusion is no longer a concern.

AOC-2 Fire Training Area. AOC-2 is located in the western portion of the property. The Facility indicated during the investigation that there were future plans to completely redevelop the current fire training area. In 2012, the Facility began the redevelopment by completely demolishing and removing the fire training area. Surface grading of the area took place. Because the area is located on an incline, surface grading included significant excavation to create a level construction area.

Approximately 1 to 5 feet of soil was removed from the area. The soil was direct loaded, transported, and ultimately disposed at a solid waste landfill. Based on the above and the soil and groundwater results of previous investigations and the RFI, AOC-2 no longer represents an area of concern because it has been effectively removed. The chromium VI detected above residential RSLs and the DAF-1 SSL within this area at SB-R-06 has been removed along with the rest of the soils in this area. In addition, site wide groundwater results for total chromium are below drinking water standards. Therefore, no further evaluation of total chromium or chromium VI in soil or groundwater is necessary.

#### **Corrective Action Objectives:**

Soils. DEQ has determined that industrial RSLs are protective of human health and the environment for individual contaminants at this Facility provided that Facility is not used for residential purposes. Therefore, DEQ's Corrective Action Objective for Facility soils is to control exposure to the hazardous constituents remaining in soils by requiring the compliance with and maintenance of land use restrictions at the Facility.

Groundwater. DEQ's policy is to restore groundwater so that it may be used for its most beneficial use if necessary, which is drinking water. Therefore, DEQ has determined that MCLs or tap water RSLs for contaminants that do not have an MCL are protective of human health and the environment for individual contaminants at this Facility. DEQ's Corrective Action Objectives for Facility groundwater are the following:

- To control exposure to the hazardous constituents remaining in the groundwater by requiring the compliance with and maintenance of groundwater use restrictions at the Facility as long as groundwater MCLs or tap water RSLs are exceeded.
- To monitor long-term stability and/or attenuation of the following hazardous constituents in groundwater until drinking water standards, as defined by MCLs and RSLs, are met and the facility can demonstrate that vapor intrusion is no longer a concern.

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### Constituents and Standards

Constituent	Standard (ug/l)	Source
Benzene	5	MCL
Ethylbenzene	700	MCL
Isopropylbenzene	68	RSL
MTBE	12	RSL
Naphthalene	0.14	RSL
2-Methylnaphthalene	15	RSL
Arsenic	10	MCL
Lead	15	MCL

The contamination and the remedy relating to the Property are described in more detail in the Virginia Department of Environmental Quality decision document entitled "Final Decision and Response to Comments, Arlington County Equipment Division (Trades Center), EPA ID No. VAD988204921, Arlington Virginia", dated October 22, 2013, which is attached hereto as Exhibit A, and incorporated herein by this reference.

### 3. Activity & Use Limitations

a. The Property is subject to the following activity and use limitations, which shall run with the land and become binding on the Grantor and any successors, assigns, tenants, agents, employees, and other persons under its control, until such time as this covenant may terminate as provided by law:

- i. The Property shall be only used for non-residential purposes;
- ii. The groundwater beneath the Property shall not be used for any purpose other than environmental monitoring and testing;
- iii. The Agency must approve any new groundwater wells installed on Facility property;
- iv. The property shall not be used in a way that will adversely affect or interfere with the integrity or protectiveness of the final remedy;
- v. The owner shall implement a groundwater monitoring program and maintain a groundwater monitoring plan and vapor intrusion remedy plan as long as contaminants in groundwater remain above levels protective of human health and until it is demonstrated to the Agency that the plans are no longer necessary to protect human health;
- vi. The owner shall require vapor mitigation be utilized in or beneath new, totally enclosed structures designed for occupation within 100 feet of groundwater contaminated with volatile organic compounds identified above protective levels or if the use of the property or buildings were modified in such a way that vapor intrusion could become a risk, unless its demonstrated to the Agency that it's not necessary to protect human health; and
- vii. All earth moving activities, including excavation, drilling and construction activities, in the areas on the property where any contaminants remain in groundwater above Federal MCLs/tap water RSLs shall be prohibited unless its demonstrated to the Agency that such activity will not pose a threat to human health or the environment or

adversely affect or interfere with the selected remedy, and the Agency provides written approval for such activity. Written approval for any such demonstrations shall be provided by the Agency within thirty (30) days.

- b. The geographic boundaries of both activity and use restrictions are described by metes bounds as follows:

Beginning at a point in the easterly line of 29<sup>th</sup> Street South that is at the southerly terminus of 29<sup>th</sup> Street South and the westerly corner of Parcel "A" Property of the Arlington County School Board, as the same appears duly recorded among the land records of Arlington County, Virginia, and running the following courses and distances:

S 26° 17' 19" W – 2.65 feet to a point;  
S 45° 38' 19" E – 110.00 feet to a point;  
S 61° 03' 03" E – 180.42 feet to a point;  
Thence 48.06 feet along the arc of a curve to the right, which has a radius of 50.00 feet, a delta of 55° 04' 16", a tangent of 26.07 feet, a chord length of 46.23 feet and a chord bearing of N 68° 09' 48" E to a point;  
Thence S 84° 17' 59" E – 16.71 feet to a point;  
Thence 78.54 feet along the arc of a curve to the right, which has a radius of 50.00 feet, a delta of 89° 59' 56", a tangent of 50.00 feet, a chord length of 70.71 feet and a chord bearing of S 39° 17' 59" E to a point;  
Thence running the following courses and distances:  
N 20° 17' 48" E – 216.88 feet to a point;  
S 83° 35' 15" E – 206.75 feet to a point;  
N 06° 54' 43" E – 177.97 feet to a point;  
N 14° 54' 21" E – 115.06 feet to a point; and  
N 63° 44' 20" W – 485.74 feet to a point in the easterly line of 29<sup>th</sup> Street South;  
Thence with the easterly line of 29<sup>th</sup> Street South N 26° 17' 14" E – 165.16 feet to a point;  
Thence leaving said line of 29<sup>th</sup> Street South and running the following courses and distances:  
S 75° 08' 23" E – 479.96 feet to a point; and  
N 14° 53' 56" E – 264.14 feet to a point in the southerly line of South Arlington Mill Drive;  
Thence continuing with the southerly line of South Arlington Mill Drive 416.89 feet along the arc of a curve to the right, which has a radius of 2616.22 feet, a delta of 09° 07' 48", a tangent of 208.89 feet, a chord length of 416.45 feet and a chord bearing of S 49° 40' 15" E to a point;  
Thence continuing with the southerly line of South Arlington Mill Drive S 45° 06' 21" E – 59.39 feet to a point;  
Thence leaving said line of South Arlington Mill Drive, and running the following courses and distances:  
S 44° 53' 39" W – 74.10 feet to a point;  
S 02° 38' 33" W – 265.33 feet to a point;  
S 87° 21' 27" E – 95.42 feet to a point;  
S 02° 38' 33" W – 8.50 feet to a point;  
S 87° 21' 27" E – 3.90 feet to a point;  
S 42° 21' 27" E – 14.40 feet to a point;

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S 02° 38' 33" W – 168.48 feet to a point;  
 S 87° 21' 27" E – 1.00 feet to a point;  
 S 02° 38' 33" W – 34.08 feet to a point;  
 S 87° 21' 27" E – 1.01 feet to a point;  
 S 06° 35' 49" W – 455.51 feet to a point;  
 S 83° 20' 39" E – 22.77 feet to a point;  
 S 05° 39' 51" W – 269.97 feet to a point;  
 N 78° 17' 19" W – 829.54 feet to a point; and  
 S 14° 48' 37" W – 700.66 feet to a point in the northerly line of 31<sup>st</sup> Street South;  
 Thence continuing with the northerly line of 31<sup>st</sup> Street South S 67° 04' 22" W – 17.80 feet  
 to a point;  
 Thence leaving the said line of 31<sup>st</sup> Street South and running the following courses and  
 distances:  
 N 22° 55' 38" W – 24.66 feet to a point;  
 N 14° 48' 37" E – 411.67 feet to a point; and  
 N 45° 37' 32" W – 913.28 feet to a point;  
 Thence 367.68 feet along the arc of a curve to the left, which has a radius of 303.99 feet,  
 a delta of 69° 17' 57", a tangent of 210.10 feet, a chord length of 345.67 feet and a chord  
 bearing of N 60° 56' 13" E to a point;  
 Thence N 26° 17' 15" E – 135.00 feet to a point that is the southerly terminus of the  
 westerly line of 29<sup>th</sup> Street South;  
 Thence S 63° 42' 47" E – 25.00 feet to the point of beginning;  
 Containing 1,381,364 square feet of land, more or less.

and are depicted as "Parcel "B" Area = 1,381,364 Sq. Ft. or 31.71175 Ac.", on the plat entitled  
 "Plat Showing Parcels "A" and "B" Property of the County Board of Arlington County Being the  
 Resubdivision of Parts of the Property of the Arlington County, Board Deed Book 246 Page 33,  
 and Deed Book 1299 Page 134, Arlington County, Virginia", by Dewberry & Davis LLC, dated  
 September, 2003, which plat is attached to this UECA environmental covenant as Exhibit B, and  
 incorporated herein by this reference.

**4. Notice of Limitations in Future Conveyances.** Each instrument hereafter conveying  
 any interest in the Property subject to this environmental covenant shall contain a notice of the  
 activity and use limitations set forth in this environmental covenant and shall provide the  
 recorded location of this environmental covenant.

## **5. Compliance and Use Reporting**

**a.** By the end of every third (3<sup>rd</sup>) January following the Agency's approval of this  
 environmental covenant, and whenever requested in writing by the Agency, the then current  
 owner of the Property shall submit, to the Agency and any Holder listed in the  
 Acknowledgments below, written documentation stating whether or not the activity and use  
 limitations in this environmental covenant are being observed and shall include an evaluation of  
 effectiveness of the institutional controls and engineering controls implemented on the property.  
 The evaluation shall include, but not be limited to, a review of groundwater and land uses within  
 vicinity of the property boundary, and zoning maps or planning documents that may affect future  
 land use in the impacted area. This documentation shall be signed by a qualified and certified

professional engineer who has inspected and investigated compliance with this environmental covenant.

b. By the end of every January following the Agency's approval of this environmental covenant, and whenever requested in writing by the Agency, the then current owner of the Property shall submit, to the Agency and any Holder listed in the Acknowledgments below, a report evaluating the effectiveness of the groundwater monitoring program, implemented in accordance with the Groundwater Monitoring Plan, at the property. An evaluation of groundwater results, conclusions, and recommendations shall be included in the report.

c. In addition, within one (1) month after any of the following events, the then current owner of the Property shall submit, to the Agency and any Holder listed in the Acknowledgments below, written documentation describing the following: noncompliance with the activity and use limitations in this environmental covenant; transfer of the Property; changes in use of the Property; or filing of applications for building permits for the Property and any proposals for any site work, if such building or proposed site work will affect the contamination on the Property subject to this environmental covenant.

**6. Access by the Holder(s) and the Agency.** In addition to any rights already possessed by the Holders(s) and the Agency, this environmental covenant grants to the Holder(s) and the Agency a right of reasonable access to the Property in connection with implementation, inspection, or enforcement of this environmental covenant.

**7. Subordination.** Grantor warrants that there are no current leases or licenses for tenancy or use of the Property by parties or entities other than the Grantor, and there are no monetary liens or encumbrances on the Property (Grantor has no authority under the Virginia Code of 1950, as amended, to encumber public property with monetary liens or encumbrances, and has sovereign immunity from the placement of any involuntary liens or encumbrances on its real property).

#### **8. Recording, Proof & Notification**

a. Within ninety (90) days after the date of the Agency's approval of this UECA environmental covenant, the Grantor shall record, or cause to be recorded, this environmental covenant with the Clerk of the Circuit Court for each locality wherein the Property is located. The Grantor shall likewise record, or cause to be recorded, any amendment, assignment, or termination of this UECA environmental covenant with the Clerk(s) of the Circuit Court within ninety (90) days of their execution. Any UECA environmental covenant, amendment, assignment, or termination recorded outside of these periods shall be invalid and of no force and effect.

b. The Grantor shall send a file-stamped copy of this environmental covenant, and of any amendment, assignment, or termination, to the Holder(s) and the Agency within sixty (60) days of recording. Within that time period, the Grantor also shall send a file-stamped copy to the chief administrative officer of each locality in which the Property is located, any persons who are in possession of the Property who are not the Grantors, any signatories to this covenant not previously mentioned, and any other parties to whom notice is required pursuant to the Uniform Environmental Covenants Act.

**9. Termination or Amendment.** This environmental covenant is perpetual and runs with the land unless terminated or amended (including assignment) in accordance with UECA.

**10. Enforcement of environmental covenant.** This environmental covenant shall be enforced in accordance with § 10.1-1247 of the Code of Virginia.

*[Signatures and Acknowledgements appear on the following pages]*

55100

**ACKNOWLEDGEMENTS:**

**GRANTOR AND HOLDER:**

**THE COUNTY BOARD OF ARLINGTON COUNTY,  
VIRGINIA, a body politic**

By: *Uri Arkin*  
Name: Uri Arkin  
Title: Real Estate Bureau Chief

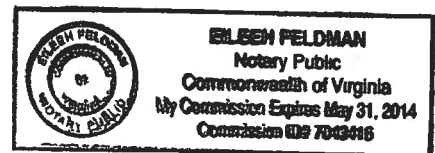
COMMONWEALTH OF VIRGINIA  
COUNTY OF ARLINGTON, to-wit:

The foregoing instrument was acknowledged before me by Uri Arkin,  
Real Estate Bureau Chief, on behalf of THE COUNTY BOARD OF ARLINGTON  
COUNTY, VIRGINIA, this 27<sup>th</sup> day of February, 2014.

*Eileen Feldman*  
Notary Public

My commission expires: May 31, 2014  
My Registration # 7043416

[Notary Seal]



**APPROVED AS TO FORM:**

*[Signature]*  
County Attorney

APPROVED by the Virginia Department of Environmental Quality as required by § 10.1-1238 et seq. of the Code of Virginia.

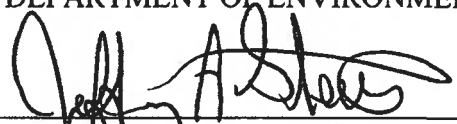
**AGENCY:**

VIRGINIA DEPARTMENT OF ENVIRONMENTAL  
QUALITY

By: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

  
Jeffery A Steers  
Division Director  
15 APRIL 2014

00155

**EXHIBIT A**  
**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**DECISION DOCUMENT**

00136





**FINAL DECISION AND RESPONSE TO COMMENTS**

**ARLINGTON COUNTY EQUIPMENT DIVISION  
(TRADES CENTER)**

**EPA ID NO. VAD988204921  
ARLINGTON, VIRGINIA**

## I. FINAL DECISION

The Virginia Department of Environmental Quality (DEQ) is issuing this Final Decision and Response to Comments (Final Decision) under the authority of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 and 6992k, regarding the remedy for the Arlington County Equipment Division facility (Facility) located at 2701 S. Taylor Street, Arlington, Virginia.

On October 22, 2013, DEQ issued a Statement of Basis (SB) in which it described its proposed remedy for the Facility. The SB is hereby incorporated in this Final Decision by reference and made a part hereof as Attachment A. DEQ's proposed remedy for the Facility consists of the following two components: 1) perform and maintain a groundwater monitoring program and 2) compliance with and maintenance of institutional controls that restrict certain land and groundwater uses at the Facility.

## II. PUBLIC COMMENT PERIOD

On November 6, 2013, DEQ placed a public notice and the SB on its web page and the Facility published the public notice for the SB in The Washington Times newspaper. The public notice announced a thirty (30)-day public comment period and requested comments from the public on the remedy proposed in the SB. The public comment period ended on December 6, 2013.

## III. RESPONSE TO COMMENTS

DEQ received no comments on its proposed remedy for the Facility. Consequently, DEQ's Final Remedy did not change from the remedy it proposed in the SB.

## IV. FINAL REMEDY

The Final Remedy, the components of which are explained in detail in the SB, requires the performance and maintenance of a groundwater monitoring program, and compliance with and maintenance of institutional controls that restrict certain land and groundwater uses at the Facility.

## V. DECLARATION

Based on the Administrative Record compiled for the Corrective Action at the Arlington County Equipment Division facility, DEQ has determined that the Final Remedy selected in this Final Decision and Response to Comments is protective of human health and the environment.



Durwood Willis, Director  
Office of Remediation Programs  
Virginia Department of Environmental Quality



Date

Attachment A: Statement of Basis, dated October 22, 2013

001538



**STATEMENT OF BASIS**

**ARLINGTON COUNTY EQUIPMENT DIVISION  
(TRADES CENTER)  
(VAD988204921)**

**September 2013**

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### Attachments

Administrative Record – Index of Documents for Statement of Basis

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Figure 1 – Facility Location Map

Figure 2 – SWMU Location Map

## **I. Introduction**

The Virginia Department of Environmental Quality (DEQ or the Department) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Arlington County Equipment Division (Trades Center) located at 2701 S. Taylor Street, Arlington, Virginia (Facility). DEQ's proposed decision consists of the following two components: 1) perform and maintain a groundwater monitoring program 2) compliance with and maintenance of institutional controls that restrict certain land and groundwater uses at the Facility. This SB highlights key information relied upon by DEQ in making its proposed decision.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. For this Facility, the DEQ retains primary authority in Virginia for the Corrective Action Program.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which DEQ's proposed decision is based. See Section IX, Public Participation, for information on how you may review the AR.

## **II. Facility Background**

The Arlington County Equipment Division (Trades Center) is a 42-acre continued use facility owned and operated by Arlington County located at the intersection of South Arlington Mill Drive and South Taylor Street in Arlington, Virginia. Operations at the Trades Center began in the 1950's. The Facility includes South Taylor Street, 28<sup>th</sup> Street South, and 29<sup>th</sup> Street South. The Trades Center is used for light industrial operations and consists of municipal office buildings and facilities used for various county functions, which include automotive vehicle repair, vehicle storage, carpentry, chemical storage, parts and equipment storage, vehicle washing, vehicle refueling, fire training, equipment repair, and earth products handling and recycling.

Hazardous waste generating activities conducted at the Facility include facility maintenance, vehicle repair, and small engine repair. Highway line painting was performed by the Facility from 1971 to 1994, after which line painting was subcontracted to a private contractor. Wastes generated at the Facility include antifreeze, batteries, brake cleaners, and parts washer solvents and fluids. Currently citrus based cleaners are used in parts washers. Since 1998, the Trades Center has been categorized as a conditionally exempt small quantity generator of hazardous waste in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR) and RCRA Regulations.

There are eight main facilities that comprise the Trades Center, which include:

- Equipment Bureau (vehicle maintenance)
- Water, Sewer, and Streets Bureau (sewer maintenance, road construction and repair, salt, sand, snow removal, and related oversight)

- Police Impound Lot (vehicle storage)
- Traffic Engineering Operations
- Solid Waste Bureau (recycling and trash services, brush/leaf collection, street sweeping, rock crushing, earth products recycling yard)
- Arlington Public Schools (oversight of warehouse and school bus parking)
- Parks, Recreation, and Cultural Resources
- Fire Training Academy (Instructional center and outside training areas)

In addition to the above, the Facility also maintains a fuel island with four underground storage tanks (UST), three compressed natural gas tanks, two liquid propane above ground storage tanks, a vehicle wash station, and a two level parking garage.

The Trades Center has approximately 663 county employees that either work on site or are dispatched from the site. Shirlington Village, which is comprised of commercial and residential dwellings is located east of the Facility. Areas south and west consist of residential development including an apartment complex located approximately 1,000 feet south and upgradient of the Facility. An apartment complex is also located approximately 1,500 feet west of the Facility and the Four Mile Run stream is located north of the Facility.

Potable water for the Trades Center and Arlington County is obtained from the Dalecarlia Reservoir in Washington D.C. and is delivered to users via a municipal public water supply distribution system. Sanitary and storm sewer lines transect the Trades Center. All sanitary waste water from the Facility is discharged to the public sanitary sewer system. As of 1995, there were no drinking water wells in the vicinity of the Facility or any plans for proposed drinking water wells. Any future development within the county will be served by the municipal water system.

### **III. Summary of Environmental Investigations**

Based on a review of files maintained by the DEQ and EPA Region 3, Tetra Tech EC, Inc. (EPA contractor) in consultation with EPA identified a number of solid waste management units (SWMU) and areas of concern (AOC) at the Trades Center. Environmental investigations were conducted on SWMUs and AOCs identified at the Facility and cleanup activities focused on the following;

- SWMU 4 - Former Traffic Engineering Storage Yard
- SWMU 5 - Former Equipment Yard Soil Pile
- SWMU 6 - Former Traffic Engineering Facility Building (Container Storage Area)
- SWMU 7 - Former USTs
- SWMU 8 - Equipment Bureau Fuel Island-Current Gasoline and Diesel USTs
- SWMU 9 - Former Maintenance Building
- AOC 2 - Fire Training Academy Area
- Site Wide Groundwater

Environmental investigations and cleanup activities at the Facility were performed in accordance with closure standards of the VHWMR, the Leaking Underground Storage Tank (LUST) Program, and the Corrective Action program. Specifically, SWMUs 4, 5, and 6 were investigated and closed in accordance with the VHWMR, SWMUs 7, 8, and 9 were investigated and closed under the LUST program, and AOC 2 and site wide groundwater were investigated

under Corrective Action, which also included a re-evaluation of SWMUs 7, 8, and 9. The Administrative Record (AR) contains detailed documents regarding the investigations, cleanup activities, and conclusions provided below.

**A. VHWMR Closure Activities**

On April 6, 1998, the Trades Center entered into a Consent Order with the DEQ to correct violations of the VHWMR observed during inspections from 1994, 1996, and 1997 including improper management, record keeping, reporting, and permitting requirements associated with storage, treatment, and disposal of toluene, paint thinner, and waste paint at SWMU 6, the Traffic Engineering Facility. The Traffic Engineering Facility also includes SWMUs 4 and 5, the storage yard and equipment yard soil pile respectively, at which toluene, paint thinner, and waste paint were improperly disposed. The Order required that the noted violations be corrected and that the Facility demonstrate "clean closure" for each of the SWMUs.

The DEQ subsequently approved closure plans provided by the Facility, initiating closure activities at SWMUs 4 and 5. In order to demonstrate clean closure, activities included the removal of waste materials, excavation of contaminated soil, confirmatory soil sampling and analysis, monitoring well installation, and implementation of a groundwater monitoring program. Clean closure of unsaturated soils was approved by DEQ on October 12, 1999. On February 22, 2002, the DEQ approved clean closure of soil and groundwater for SWMUs 4, 5, and 6 in accordance with the approved Closure Plan and the VHWMR.

**B. LUST Program Cleanup Activities**

LUST Program cleanup activities were performed at the Facility at SWMUs 7, 8, and 9, which are adjacent to each other on-site and include the former USTs, fueling island, and former maintenance building respectively (Figure 1). Beginning in 1990, the Trades Center removed twelve USTs and installed 4 new 12,000 gallon USTs at SWMU 7, constructed a fueling station at SWMU 8, and addressed petroleum contamination at SWMU 7, SWMU 8, and SWMU 9, which was a hydraulic fluid release that occurred from underground hydraulic lift pits located in the former maintenance building. The cleanup activities associated with these areas were performed under Pollution Complaint No. PC1991-0022 issued by the DEQ.

The USTs at SWMU 7 were used for storage of unleaded gasoline, diesel fuel, and motor oil. During excavation activities, free product and contaminated soil were observed just beneath the asphalt. Subsequently, 2,500 cubic yards of soil were excavated and transported off-site for disposal. Samples collected of the excavated soils contained total petroleum hydrocarbon (TPH) concentrations ranging from 792 mg/kg to 4,350 mg/kg and concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX) ranging from 196 mg/kg to 512 mg/kg. The Initial Abatement Report following excavation and UST removal activities indicated that contamination was present in the up gradient and down gradient directions, but noted that further excavation was not possible. Based on this, a site investigation was conducted. The investigation included the advancement of direct push soil borings, soil sample collection, subsequent installation of groundwater monitoring wells, and groundwater sample collection. Results of the investigation indicated that TPH, volatile organic compounds (VOC) including BTEX, and lead were detected in soil and groundwater in a limited area around the excavation and that free product was observed in the up gradient monitoring well (MW-1).

Based on results of the investigation, the Trades Center conducted a Site Characterization

investigation in 1993, during which a hydraulic fluid release from underground hydraulic lift pits was identified at SWMU 9. The cleanup activities associated with SWMU 9 included monitoring well installation, product recovery, groundwater monitoring, and installation and operation of a groundwater pump and treat system. Product recovery began in 1994 and a groundwater pump and treat system was installed in 1999 as the long term corrective measure. In 2001, the system was modified to include 8 additional extraction wells and was operated until 2004. Subsequent to system shutdown in 2004, groundwater monitoring and passive product recovery continued to be conducted quarterly. Concurrent with these activities in 2002, a contractor made repairs to a cracked overspill container at SWMU 8 and observed evidence that a release of diesel fuel had occurred. In response, the Facility excavated soil and found that an underground secondary containment line had been improperly installed. Repairs to the line were made and subsequent monitoring and corrective measures were addressed under pollution complaint number PC#2002-3198. Subsequently, on June 29, 2004 the DEQ Northern Regional Office issued correspondence to the Facility stating that the petroleum contamination case associated with PC#2002-3198 was closed.

Groundwater level measurements, free-phase product measurements and recovery in wells and the hydraulic lift pits, and groundwater monitoring were conducted at these SWMUs until April 2013. In 2012, the Facility and the DEQ conducted a case evaluation and collectively determined that corrective measures had reduced free-phase product and dissolved phase concentrations of petroleum related compounds to levels that do not represent an identified risk to human health and the environment under the current use of the site. In addition, the Facility will continue to address these compounds in accordance with the EPA's Corrective Action Program to meet objectives for future use. Therefore, on April 9, 2013 the DEQ Northern Regional Office issued correspondence to the Facility stating that the petroleum contamination case associated with PC#1991-0022 was closed.

#### C. Corrective Action Program Activities

In 2011, the Facility conducted a Phase I RCRA Facility Investigation (RFI) to evaluate environmental impacts from SWMUs and AOCs identified during the initial RCRA site visit that was performed on October 30, 2008 by EPA and DEQ. The investigation was performed in accordance with a work plan approved by the DEQ and focused primarily on the areas listed above including site-wide groundwater. The investigation consisted of soil boring advancement, monitoring well installation, and collection of soil and groundwater samples for chemical analysis volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs). Soil borings were advanced and monitoring wells were installed at SWMUs 7, 8, 9, and 10 (Equipment Bureau Oil USTs), AOC 2 (Fire Training Area), and at areas down gradient adjacent to the facility's property boundary. The soil borings and monitoring wells were installed in order to collect surface and subsurface soil samples and groundwater samples. Monitoring wells were installed in lieu of soil borings in several locations in anticipation of implementing a groundwater monitoring program after completing the investigation.

#### *Soils*

The results of the soil samples collected indicate that VOCs and PCBs were not detected above residential Regional Screening Levels (RSLs) for direct contact, which are EPA's conservative human health risk-based screening criteria. However, five polynuclear aromatic

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hydrocarbons (PAHs) exceeded residential RSLs for direct contact in one location (SB-R-01), which is in vicinity of SWMU 7. Two of these PAHs, benzo(a)pyrene and dibenz(a,h)anthracene, exceeded industrial RSLs for direct contact but are within the EPA's acceptable risk range of  $10E-6$  to  $10E-4$ . Results for the SB-R-01 location also indicated that the PAHs present in the surface soil were not detected above method detection limits in the subsurface soil. In addition, soil results indicated that arsenic and total chromium exceeded residential RSLs for direct contact in the majority of the soil samples collected. The maximum arsenic concentration observed was 6.2 mg/kg in surface soil at MW-R-07 and MW-R-08 and the maximum total chromium concentration observed was 37 mg/kg in surface soil at MW-R-02.

In addition to total chromium, the Facility analyzed five of its total chromium samples for chromium VI to evaluate the overall levels present at the site. Results indicated that chromium VI was detected at a concentration of 1.6 mg/kg in subsurface soil at AOC-2 as indicated by soil boring SB-R-06 at a depth of 2-4 feet below ground surface (ft bgs), which is above residential RSLs for direct contact, but below industrial RSLs. Chromium VI was not detected above method detection limits in the remaining four samples. In 2012, the Facility redeveloped AOC-2, the fire training area, which included soil removal (see section AOC-2 Fire Training Area below). Therefore chromium VI at AOC-2 has been addressed and no further evaluation is necessary. In addition, the concentrations of arsenic and total chromium observed across the remainder of the Facility are in line with published regional background concentrations. Therefore further evaluation of arsenic and total chromium is not required.

Finally, soil results were screened using site screening levels (SSLs) for soil to groundwater transfer. SSLs used for screening were based on a dilution attenuation factor of one (DAF-1) and twenty (DAF-20). Screening results indicated that several VOCs, SVOCs, and metals exceeded DAF-1 SSLs. The majority of DAF-1 SSL exceedances for VOCs and SVOCs were due to the fact that screening levels were lower than method detection limits for those constituents. A number of these VOCs and SVOCs also exceeded DAF-20 SSLs for the same reason. Therefore groundwater results site wide were evaluated with respect to the SSL screening process.

Based on the results of the soil screening process including the transfer to groundwater screening process, institutional controls that restrict the residential use of the property and that require a demonstration of no unacceptable risk to human health and the environment when disturbing soils are required as part of the final remedy. In addition, the Facility will continue groundwater monitoring in accordance with an approved Groundwater Monitoring Plan.

#### ***Groundwater***

Groundwater was sampled from a total of eighteen locations site-wide, sixteen of which were permanent monitoring well locations that were either existing or installed specifically for this investigation. Monitoring wells were installed up gradient of SWMUs 7, 8, 9, and 10. Monitoring wells were also installed inside of SWMU 9 to evaluate groundwater beneath the former equipment building and wells were installed down gradient of the Facility adjacent to the property boundary. The newly installed monitoring wells were sampled concurrent with existing wells located in SWMUs 7 and 8 during the investigation.

Groundwater results indicate that VOCs, SVOCs, and metals were detected above drinking water standards, namely Maximum Contaminant Levels (MCLs) or tap water RSLs for constituents that do not currently have an MCL. MCLs are promulgated under 40 CFR 141,

pursuant to Section 1412 of the Safe Drinking Water Act (SDWA), 42 USC Section 300 ug-l. VOCs detected above drinking water standards were limited to petroleum related constituents benzene, ethylbenzene, MTBE, and isopropylbenzene in SB-R-04 and MW-2. Groundwater samples were analyzed for naphthalene via EPA SW-846 Method 8260B and 8270. Based on this naphthalene was detected above its tap water RSL in six of the eighteen sample locations, including SB-R-02. 2-Methylnaphthalene was the only other SVOC/PAH detected above standards and is limited to the SB-R-02 and MW-37 locations. Arsenic was detected at a concentration of 13 ug/l at SB-R-02 and lead was detected at concentrations of 210 ug/l and 28 ug/l at SB-R-02 and MW-R-01 respectively. All other detections of metals in groundwater were below drinking water standards.

In addition to drinking water standards, groundwater results were screened using conservative risk based levels for groundwater to vapor transfer in efforts to evaluate the potential for vapor intrusion (VI) under current use and anticipated future use of the property. Screening results indicate that several VOCs and naphthalene exceed residential and industrial groundwater to indoor air VI screening criteria. Constituents that exceed industrial VI screening criteria primarily include benzene, ethylbenzene, xylenes, and naphthalene and were observed primarily at SB-R-04 and at MW-2. No buildings or totally enclosed structures are located within reasonable proximity of where these results were observed, greatly limiting or eliminating the potential for vapor intrusion. The Facility is currently used for industrial purposes and the anticipated future use of the property is industrial. Therefore it is not necessary to investigate potential vapor intrusion any further under the current use of the property.

Groundwater results indicate that there is no contiguous groundwater contaminant plume present at the Facility. Results indicate that contaminant detections in groundwater are sporadically located within the center portion of the facility (SWMU 7, 8, and 9), which are not indicative of any on-going source area(s), and represent residual contaminants from historical releases that have been cleaned up previously under the LUST program. It is anticipated that the presence of these contaminants will dissipate over time, ultimately meeting the Corrective Action objectives.

Based on the results of the groundwater screening process and evaluation, institutional controls that restrict the use of groundwater beneath the property and that require the implementation of a groundwater monitoring program in accordance with an approved Groundwater Monitoring Plan are required as part of the final remedy. The final remedy also requires a Vapor Intrusion Remedy Plan, which requires installation of vapor barriers or demonstration of no unacceptable risk due to VI in any newly constructed and fully enclosed buildings or if the use of the property or buildings were modified in such a way that vapor intrusion could become a risk. These plans will remain in place until groundwater Corrective Action objectives are met and the facility can demonstrate that vapor intrusion is no longer a concern.

#### ***AOC-2 Fire Training Area***

AOC-2 is located in the western portion of the property. The Facility indicated during the investigation that there were future plans to completely redevelop the current fire training area. In 2012, the Facility began the redevelopment by completely demolishing and removing the fire training area. Surface grading of the area took place. Because the area is located on an incline, surface grading included significant excavation to create a level construction area.

Approximately 1 to 5 feet of soil was removed from the area. The soil was direct loaded, transported, and ultimately disposed at a solid waste landfill.

Based on the above and the soil and groundwater results of previous investigations and the RFI, AOC-2 no longer represents an area of concern because it has been effectively removed. The chromium VI detected above residential RSLs and the DAF-1 SSL within this area at SB-R-06 has been removed along with the rest of the soils in this area. In addition, site wide groundwater results for total chromium are below drinking water standards. Therefore, no further evaluation of total chromium or chromium VI in soil or groundwater is necessary.

#### IV. Corrective Action Objectives

##### A. Soils

DEQ has determined that industrial RSLs are protective of human health and the environment for individual contaminants at this Facility provided that Facility is not used for residential purposes. Therefore, DEQ's Corrective Action Objective for Facility soils is to control exposure to the hazardous constituents remaining in soils by requiring the compliance with and maintenance of land use restrictions at the Facility.

##### B. Groundwater

DEQ's policy is to restore groundwater so that it may be used for its most beneficial use if necessary, which is drinking water. Therefore, DEQ has determined that MCLs or tap water RSLs for contaminants that do not have an MCL are protective of human health and the environment for individual contaminants at this Facility. DEQ's Corrective Action Objectives for Facility groundwater are the following:

1. To control exposure to the hazardous constituents remaining in the groundwater by requiring the compliance with and maintenance of groundwater use restrictions at the Facility as long as groundwater MCLs or tap water RSLs are exceeded.
2. To monitor long-term stability and/or attenuation of the following hazardous constituents in groundwater until drinking water standards, as defined by MCLs and RSLs, are met and the facility can demonstrate that vapor intrusion is no longer a concern.

**Constituents and Standards**

Constituent	Standard (ug/l)	Source
Benzene	5	MCL
Ethylbenzene	700	MCL
Isopropylbenzene	68	RSL
MTBE	12	RSL
Naphthalene	0.14	RSL
2-Methylnaphthalene	15	RSL
Arsenic	10	MCL
Lead	15	MCL

**V. Summary of Proposed Remedy**

**A. Summary**

Under this proposed remedy, DEQ is requiring the following actions:

1. The implementation of the groundwater monitoring program to monitor progress and to confirm long-term stability and/or attenuation of hazardous constituents in groundwater at least annually;
2. The ongoing maintenance of institutional controls to prohibit on-site groundwater use; limit Facility property to non-residential uses, evaluate and if necessary mitigate vapor intrusion, and require any subsequent owners to comply with these restrictions. These institutional controls shall include, but are not limited to, the following land and groundwater use restrictions, access, and reporting requirements;
  - a. Groundwater at the Facility shall not be used for any purpose other than monitoring activities required by DEQ and EPA, unless it is demonstrated to DEQ, in consultation with 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, in consultation with EPA, provides written approval for such use;
  - b. The Facility property shall not be used for residential purposes unless it is demonstrated to DEQ, in consultation with 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, in consultation with EPA, provides written approval for such use;
  - c. DEQ and EPA must approve any new groundwater wells installed on Facility property;
  - d. The property will not be used in a way that will adversely affect or interfere with the integrity or protectiveness of the final remedy;
  - e. Owner agrees to allow EPA, state, and/or their authorized agents and representatives access to the property to inspect and evaluate the effectiveness of the final remedy and if necessary, to conduct additional remediation to ensure the protection of public health and safety and the environment based upon the final remedy to be selected by DEQ in the Final Decision and Response to Comments (FDRTC);
  - f. Owner agrees to provide DEQ and EPA with a "Certified, True and Correct Copy" of any instrument that conveys any interest in the Facility property or any portion thereof;
  - g. The Facility shall maintain a groundwater monitoring plan and vapor intrusion remedy plan as long as contaminants in groundwater remain above levels protective of human health and until it is demonstrated to DEQ and EPA that the plans are no longer necessary to protect human health;
  - h. Require vapor mitigation be utilized in or beneath new, totally enclosed structures designed for occupation within 100 feet of the foot print of groundwater contaminated with volatile organic compounds identified above protective levels or if the use of the property or buildings were modified in such a way that vapor intrusion could become a risk, unless its demonstrated to DEQ and EPA that it's not necessary to protect human health;
  - i. All earth moving activities, including excavation, drilling and construction activities, in the areas at the Facility where any contaminants remain in groundwater above Federal MCLs/tap water RSLs shall be prohibited unless it is demonstrated to DEQ, in consultation with EPA, that such activity will not pose a threat to human health or the

environment or adversely affect or interfere with the selected remedy, and DEQ, in consultation with EPA, provides prior written approval for such activity. Written approval for any such demonstrations will be provided by the agency within thirty (30) days.

**B. Implementation**

DEQ proposes to implement the institutional controls through an Environmental Covenant, pursuant to the Virginia Uniform Environmental Covenants Act (UECA), Title 10.1, Chapter 12.2, Sections 10.1-1238-10.1-1250 of the Code of Virginia. Therefore, DEQ does not anticipate any regulatory constraints in implementing its proposed remedy.

**C. Reporting Requirements**

DEQ's proposed remedy includes the following reporting requirements for the Arlington Trades Center facility:

1. Compliance with and effectiveness of institutional controls and engineering controls implemented at the Facility shall be evaluated every 3 years. The evaluation will include, but not be limited to, a review of groundwater and land uses within vicinity of the Facility property boundary and zoning maps or planning documents that may affect future land use in the impacted area. A report documenting the findings of the evaluation shall be provided to DEQ and EPA.
2. Compliance with and effectiveness of the proposed remedies at the Facility in reducing contaminant concentrations and restoring the groundwater to MCLs/tap water RSLs shall be evaluated and included in an annual Groundwater Monitoring Report required by the Groundwater Monitoring Plan. Groundwater results from the Facility shall also be reported in the Groundwater Monitoring Report.

**VI. Evaluation of DEQ's Proposed Decision**

This section provides a description of the criteria DEQ used to evaluate the proposed decision consistent with EPA guidance. The criteria are applied in two phases. In the first phase, DEQ evaluates three decision threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, DEQ then evaluates seven balancing criteria to determine which proposed decision alternative provides the best relative combination of attributes.

**A. Threshold Criteria**

**1. Protect Human Health and the Environment**

This proposed remedy protects human health and the environment from exposure to contamination. DEQ's proposed decision meets this standard for current and anticipated future land use. Based on the results of previous investigations and cleanup activities all known sources of contamination have been characterized and addressed. Further investigation or corrective actions are not necessary to protect human health or the environment.

The property is currently used as an industrial facility consisting of buildings, storage and

parking structures, maintenance facilities, and paved areas. Potable water is supplied to the property by Arlington's municipal water supply system. Required by this remedy, groundwater use, for purposes other than environmental testing, and residential use of the property will be restricted via environmental covenant in accordance with UECA. The Facility is required to maintain these restrictions, which will ensure ongoing protection of human health and the environment. The Facility is required to continue the groundwater monitoring program to monitor progress and to confirm stability and/or dissipation of hazardous constituents at the Facility.

## 2. Achieve Media Cleanup Objectives

DEQ's proposed remedy meets the appropriate cleanup objectives based on current and reasonably anticipated future land and water resource use(s). The current use of the property is industrial and the reasonably anticipated future use of the property is industrial based on current zoning status. In addition, Arlington County is densely populated and it is not feasible that the Trades Center could conduct county operations from any other location within the county other than their current location. Based on this, future use of the property will remain industrial. Potable water is supplied to the Facility by the County. For soil, several constituents in the subsurface were detected above residential screening criteria. However, with the exception of PAHs, benzo(a)pyrene and dibenz(a,h)anthracene, in one soil sample, constituents were below industrial screening criteria. The PAHs concentrations are within EPA Region 3's acceptable risk range of 10E-6 to 10E-4 and were shown to not present an unacceptable risk to human health or the environment based on the results of a qualitative human health risk assessment performed during the RFI. With the land use restrictions in place, it is considered that media cleanup objectives for soil under an industrial land use scenario have been attained.

For groundwater, a limited number of VOCs, SVOCs, and metals are still above media cleanup standards (MCLs/tap water RSLs). The following are cleanup standards for these constituents:

**Constituents and Standards**

Constituent	Standard (ug/l)	Source
Benzene	5	MCL
Ethylbenzene	700	MCL
Isopropylbenzene	68	RSL
MTBE	12	RSL
Naphthalene	0.14	RSL
2-Methylnaphthalene	15	RSL
Arsenic	10	MCL
Lead	15	MCL

However, there is no current use of the groundwater from beneath the property as a drinking water source. Institutional controls restricting the use of groundwater from beneath the property will remain in place and groundwater monitoring will continue until groundwater

cleanup standards for these constituents have been met. Groundwater monitoring data will be evaluated periodically to ensure that contaminants remain stable and/or continue to decline.

### **3. Remediating the Source of Releases**

In all proposed decisions, DEQ and EPA seek to eliminate or reduce further releases of hazardous wastes or hazardous constituents that may pose a threat to human health and the environment. Since 1991, the Facility has removed and mitigated all potential and/or known sources of releases and remediated impacts from those releases in accordance with various program requirements. No known sources or source areas remain at the Facility.

## **B. Balancing/Evaluation Criteria**

### **1. Long-Term Effectiveness**

The proposed remedy will maintain protection of human health and the environment over time by controlling exposure to the hazardous constituents remaining in soil and groundwater. DEQ's proposed decision requires on-going compliance with and maintenance of the land use and groundwater use restrictions at the Facility. Land use and groundwater use restrictions will be implemented through an environmental covenant in accordance with UECA and recorded with the deed for the Facility property. Groundwater at the Facility will be monitored periodically to ensure that contaminant levels continue to remain stable and/or decline and do not leave the Facility.

### **2. Reduction of Toxicity, Mobility, or Volume of the Hazardous Constituents**

The reduction of toxicity, mobility and volume of hazardous constituents at the Facility has already been achieved by previous cleanup activities summarized above in accordance with the Virginia Solid and Hazardous Waste Regulations and environmental cleanup programs including the LUST Program.

### **3. Short-Term Effectiveness**

DEQ's proposed decision does not involve any activities, such as construction or excavation that would pose short-term risks to workers, residents, and the environment. In addition, the land use and groundwater use restrictions will be implemented through an environmental covenant in accordance with UECA and recorded with the deed for the Facility property.

### **4. Implementability**

DEQ's proposed decision is readily implementable. The Facility has committed to imposing upon the property the land use and groundwater use restrictions required by this proposed remedy in the form of an environmental covenant. A Groundwater Monitoring Plan for continued monitoring of the contaminants in groundwater and a Vapor Intrusion Remedy Plan will be immediately implemented subsequent to approval.

### **5. Cost**

DEQ's proposed decision is cost effective. Given that the proposed remedy consists of

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developing an environmental covenant and periodic groundwater monitoring, the only recurring costs are operational and maintenance (O&M) and reporting costs associated with the monitoring network and program.

**6. Community Acceptance**

DEQ will evaluate Community acceptance of the proposed decision during the public comment period and it will be described in the Final Decision and Response to Comments.

**7. State/Support Agency Acceptance**

DEQ coordinated with EPA on its proposed remedy. In addition, DEQ will evaluate EPA's acceptance of the proposed remedy during the public comment period and will describe the EPA's position in the Final Decision and Response to Comments.

**VII. Environmental Indicators**

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: 1) current human exposures under control and 2) migration of contaminated groundwater under control. The Facility met these indicators on June 1, 2012 and March 20, 2012, respectively.

**VIII. Financial Assurance**

DEQ has evaluated whether financial assurance for corrective action is necessary to implement DEQ's proposed decision at the Facility. Given that DEQ's proposed decision does not require any further engineering actions to remediate soil, groundwater or indoor air contamination at this time and given that the costs of implementing institutional controls at the Facility will be de minimis, DEQ is proposing that no financial assurance be required.

**IX. Public Participation**

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by DEQ in reaching this proposed decision. It is available for public review during normal business hours at:

Virginia Department of Environmental Quality  
Central Office  
629 East Main Street  
Virginia, VA 23219  
Contact: Brett Fisher  
Phone: (804) 698-4219  
Fax: (804) 698-4234  
Email: [brett.fisher@deq.virginia.gov](mailto:brett.fisher@deq.virginia.gov)

Interested parties are encouraged to review the AR and comment on DEQ's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice



is published in a local newspaper. You may submit comments by mail, fax, or email to Brett Fisher. DEQ will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Brett Fisher.

DEQ will respond to all relevant comments received during the comment period. If DEQ determines that new information warrant a modification to the proposed decision, DEQ will modify the proposed decision or select other alternatives based on such new information and/or public comments. DEQ will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Brett Fisher at the address listed above.

Date: *October 22, 2013*



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Durwood Willis, Director  
Office of Remediation Programs  
Virginia Department of Environmental Quality

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**ATTACHMENTS**

ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT  
ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT  
ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT

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Arlington County Equipment Division  
(Trades Center)  
2701 South Taylor Street  
Arlington, VA  
EPA ID#: VAD988204921

ADMINISTRATIVE RECORD  
Index of Documents for STATEMENT OF BASIS

This index includes documents that the Virginia Department of Environmental Quality (VDEQ) relied upon to develop and propose the final remedy selection determination described in the Statement of Basis. These documents are listed chronologically by document date.

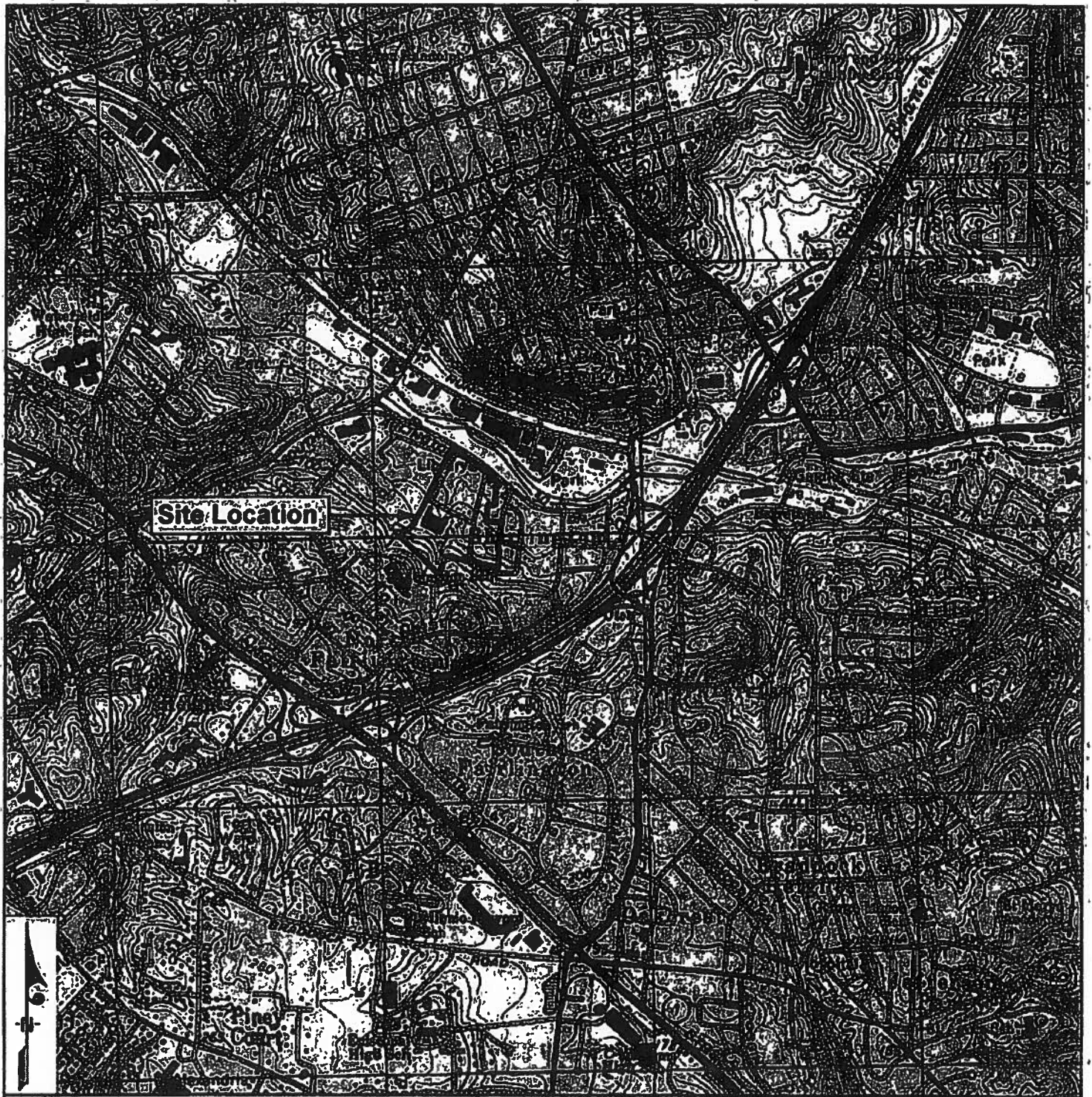
1. Acceptance of Closure for Traffic Engineering Facility Building, Equipment Yard, and Equipment Yard Soil Pile, unsaturated soils, Arlington Trades Center, prepared by VDEQ, October 12, 1999
2. Closure Certification Letter, saturated soils, Arlington County Trades Center, prepared by Greenhome & O'Mara, Inc., October 11, 2002
3. Annual Groundwater Monitoring Report, Arlington Trades Center Facility, prepared by Greenhome & O'Mara, Inc., January 20, 2003
4. Memorandum, Closure Verification for Arlington County Trades Center Earth Products Area, Arlington Trades Center, prepared by VDEQ, January 30, 2003
5. Closure Verification of Arlington County Trades Center Earth Products Area, saturated soils, Arlington Trades Center, prepared by VDEQ, January 31, 2003
6. Letter, PC#2002-3198; CASE CLOSED; Arlington County Trades Center – Fueling Facility, prepared by VDEQ Northern Regional Office (NRO), June 29, 2004
7. Final Site Visit Report, Arlington County Equipment Division-Trades Center, prepared by United States Environmental Protection Agency (EPA), August 13, 2009
8. Facility Lead Agreement, Arlington Trades Center, prepared by EPA, July 29, 2010
9. RCRA Corrective Action Phase I Site Investigation Work Plan, Arlington Trades Center Facility, prepared by Greenhome & O'Mara, Inc., March 24, 2011
10. Approval Letter, RCRA Corrective Action Phase I Site Investigation Work Plan, Arlington Trades Center, prepared by VDEQ, April 26, 2011
11. RCRA Corrective Action Phase I Site Investigation Sampling and Analysis Plan, Arlington Trades Center Facility, prepared by Greenhome & O'Mara, Inc., June 3, 2011
12. Approval Letter, RCRA Corrective Action Phase I Site Investigation Sampling and Analysis Plan, Arlington Trades Center, prepared by VDEQ, June 27, 2011
13. Data Reports, Underground Hydraulic Lift Pits and Well Gauging Data, Arlington Trades Center, July 8, 2011 through October 3, 2011
14. RCRA Corrective Action Environmental Indicator (EI) Determination Report, Migration of Contaminated Groundwater Under Control; CA750, Arlington Trades Center, prepared by VDEQ, March 30, 2012

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15. Corrective Action Plan General Monitoring Report, PC#1991-0022, Arlington County Trades Center, Fueling Facility, prepared by Environmental Consultants and Contractors, Inc., April 18, 2012
16. RCRA Corrective Action Environmental Indicator (EI) Determination Report, Human Health Exposure Under Control; CA725, Arlington Trades Center, prepared by VDEQ, June 1, 2012
17. Memorandum, 1991-0022, Old Arlington County Maintenance Building, Arlington Trades Center, prepared by VDEQ NRO, April 2, 2013
18. Letter, PC#1991-0022; CASE CLOSED; Arlington County Trades Center – Fueling Facility, prepared by VDEQ NRO, April 9, 2013
19. RCRA Corrective Action Facility Investigation Report, Arlington Trades Center, prepared by Greenhome & O'Mara, Inc., April 10, 2013
20. Approval Letter, RCRA Corrective Action Facility Investigation Report, Arlington Trades Center, prepared by VDEQ, July 18, 2013

**FIGURES**

ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT  
ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT  
ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT



**Figure 1. Site Location Map**

0 1000 2000 4000 feet  
0 1 kilometer

Source: National Geographic Mid-Atlantic USA Seamless Topographic Maps on CD 2000.



**GREENHORNE & O'MARA**  
CONSULTING ENGINEERS





**LEGEND**

- ① Solid Waste Management Unit Location (SWMU)
- Ⓐ Area of Environmental Concern (AOC)

**SWMUs**

- 1 Parts Washer(s)
- 2 Brake Cleaners
- 3 Former Immersion Cleaner
- 4 Former Traffic Engineering Storage Yard (Equipment Yard, Gravel Parking Lot)
- 5 Former Equipment Yard Soil Pile (Earth Products Area)
- 6 Former Traffic Engineering Facility (TEF) Building (Container Storage Area)

**SWMUs (continued)**

- 7 Former USTs
- 8 Equipment Bureau Fuel Island (Current Gasoline and Diesel USTs)
- 9 Old Maintenance Building - Old Equipment Shop - Former Lube Pits Area
- 10 Current Equipment Bureau Oil USTs
- 11 Dumpsters\*
- 12 Satellite Accumulation Areas\*
- 13 Aerosol Can Recycler
- 14 Sweeper Debris Pile
- 15 Vehicle Wash Facility

**AOCs:**

- 1 Oil Spill at Tub Grinder
- 2 Fire Training Academy Area

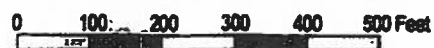
\* One of several throughout facility.

Source: Tetra Tech Report, Figure 3. (Tetra Tech, 2005)  
Aerial Photography Source: Arlington County GIS Mapping Center.



**GREENHORNE & O'MARA**  
CONSULTING ENGINEERS

**Figure 3. SWMU and AOC Location Map**



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**EXHIBIT B**  
**PLAT**

ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT  
ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT  
ARLINGTON COUNTY  
CLERK OF THE CIRCUIT COURT

09100



2	50.00'	55°04'16"	48.06'	26.07'	46.23'	N68°09'48"E
3	50.00'	89°59'56"	78.54'	50.00'	70.71'	S39°17'59"E
4	2616.22'	09°07'48"	416.89'	208.89'	416.45'	S49°40'15"E

### AREA TABULATION

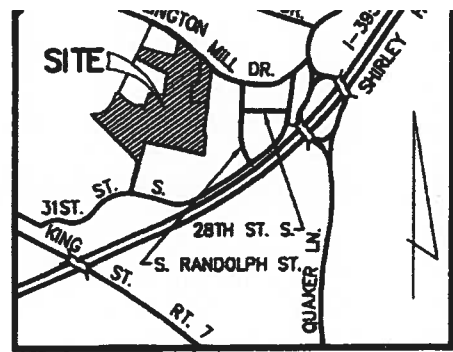
PARCEL "A" ..... 40,857 SQ. FT. OR 0.93795 AC.  
 PARCEL "B" .... 1,381,364 SQ. FT. OR 31.71175 AC.  
 TOTAL ..... 1,422,221 SQ. FT. OR 32.64970 AC.

MATCH  
LINE

19100

### NOTES:

1. THE PROPERTY DELINEATED ON THIS PLAT APPEARS ON ARLINGTON COUNTY TAX ASSESSMENT MAPS NO. 93-04 AND NO. 93-08, AND IS IDENTIFIED BY REAL PROPERTY CODE (RPC) NUMBER 29-003-026.



## VICINITY MAP

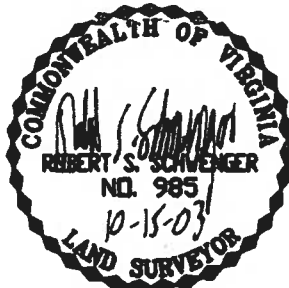
SCALE : 1" = 2,000'

### SURVEYOR'S CERTIFICATE

I, ROBERT S. SCHWENGER, A DULY LICENSED LAND SURVEYOR IN THE COMMONWEALTH OF VIRGINIA, DO HEREBY CERTIFY THAT I HAVE CAREFULLY SURVEYED THE PROPERTY DELINEATED ON THIS PLAT AND THAT IT IS CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF; THAT IT IS PART OF THE PROPERTY ACQUIRED BY THE COUNTY BOARD OF ARLINGTON COUNTY, VIRGINIA IN DEED BOOK 246 AT PAGE 33, AND DEED BOOK 1299 AT PAGE 134, IN THE ARLINGTON COUNTY LAND RECORDS.

I FURTHER CERTIFY THAT THE RESUBDIVISION AS SHOWN HEREON LIES ENTIRELY WITHIN THE BOUNDS OF THE ORIGINAL TRACT, THAT IRON PIPES WILL BE SET AT ALL NEW LOT CORNERS.

GIVEN UNDER MY HAND THIS 15TH DAY OF OCTOBER, 2003.



REVISED: 1-6-04  
REVISED: 5-10-04  
REVISED: 7-23-04

MATCH  
LINE

00162

Exhibit B

PLAT SHOWING

PARCELS "A" AND "B"

PROPERTY OF THE COUNTY BOARD  
OF ARLINGTON COUNTY

BEING THE RESUBDIVISION OF

PARTS OF THE PROPERTY OF THE  
ARLINGTON COUNTY BOARD

DEED BOOK 246 PAGE 33, AND DEED BOOK 1299 PAGE 134

ARLINGTON COUNTY, VIRGINIA

SCALE: 1" = 100'

SEPTEMBER, 2003

THIS PLAT OFFERED FOR RECORD

MATCH  
LINE

31ST STREET SOUTH  
VARIABLE WIDTH R/W

N22°55'38"W  
24.66'

S67°04'22"W  
17.80'

PROPERTY OF THE ARLINGTON COUNTY BOARD  
N14°48'37"E-411.67'

S14°48'37"W-700.66'

PERCELS "B"  
FOR RE-DEVELOPMENT

N45°37'32"W-913.28'

PROPERTY OF THE ARLINGTON COUNTY BOARD

PART OF THE PROPERTY OF THE  
ARLINGTON COUNTY BOARD  
DBL 290 PG 34

A=367.68'

N26°17'15"E  
135.00'

S63°4  
25'

S45°39'10"W

A=4

A=

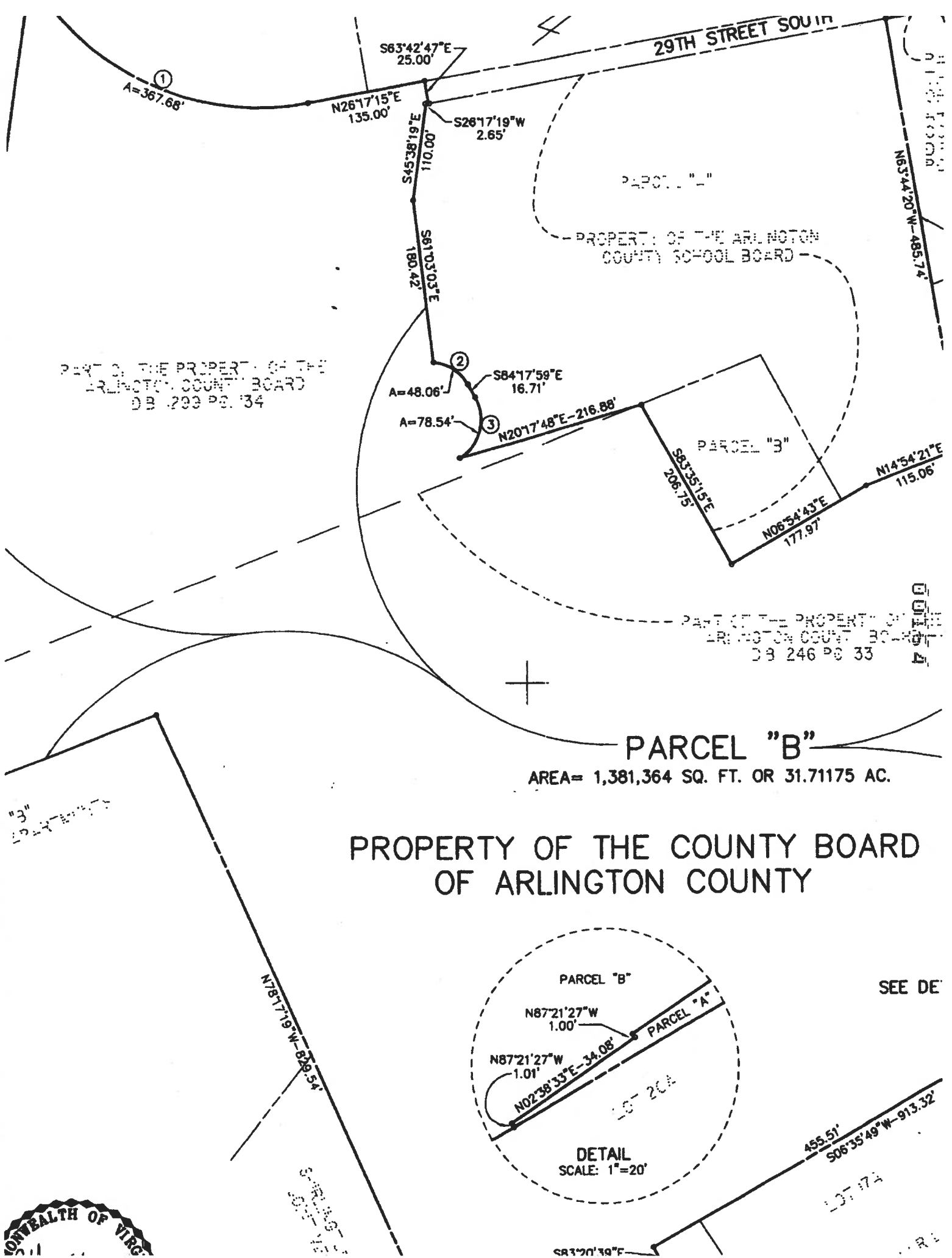
00153

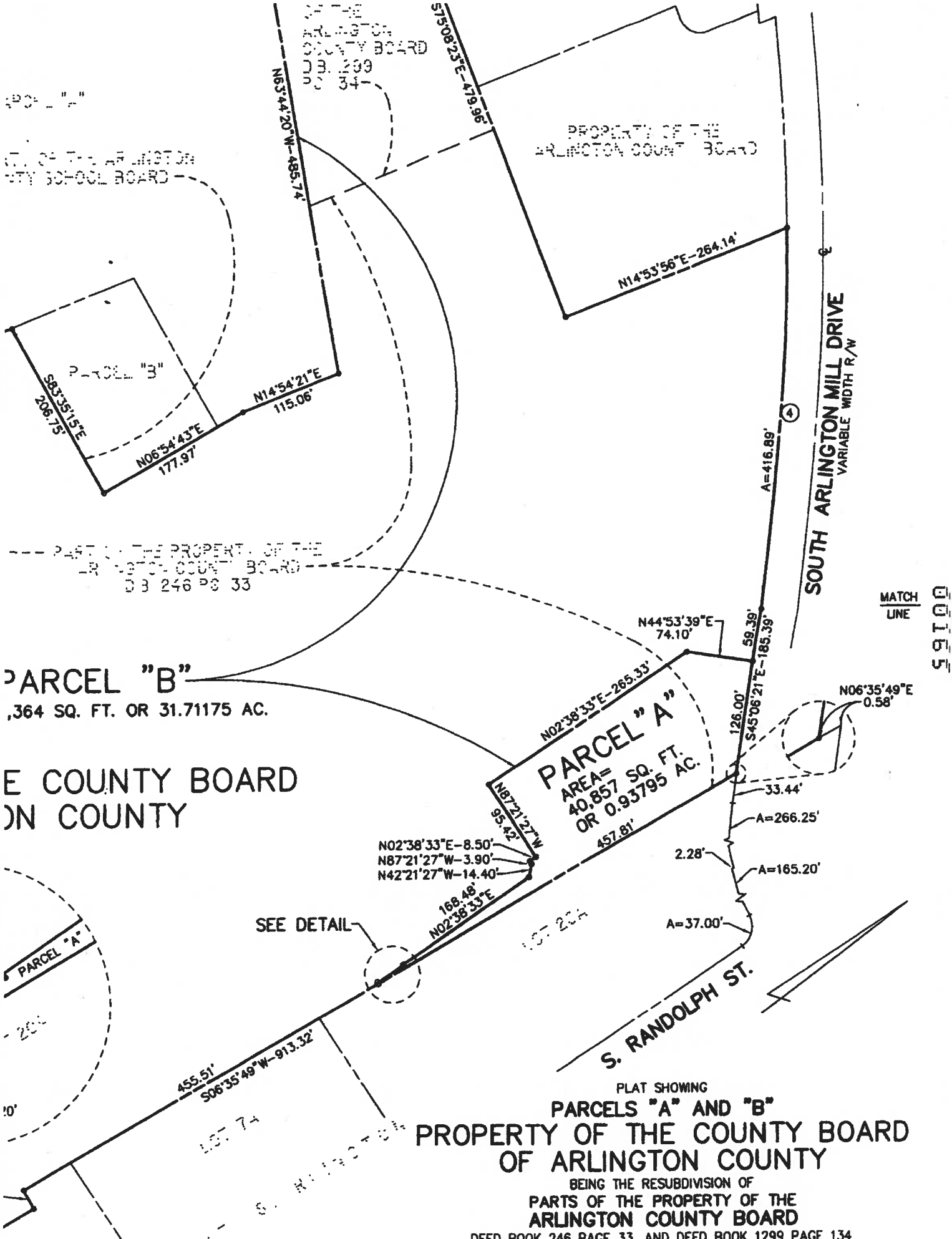
PRO

N76°17'19"W-826.54'



6-2-2003  
12:00 PM





ARLINGTON COUNTY SCHOOL BOARD

PROPERTY OF THE ARLINGTON COUNTY BOARD

PROPERTY OF THE ARLINGTON COUNTY BOARD

PARCEL "B"

PARCEL "B"  
364 SQ. FT. OR 31.71175 AC.

ARLINGTON COUNTY BOARD

PARCEL "A"  
AREA = 40,857 SQ. FT.  
OR 0.93795 AC.

SOUTH ARLINGTON MILL DRIVE  
VARIABLE WIDTH R/W

MATCH LINE

59100

SEE DETAIL

S. RANDOLPH ST.

PLAT SHOWING  
PARCELS "A" AND "B"  
PROPERTY OF THE COUNTY BOARD  
OF ARLINGTON COUNTY

BEING THE RESUBDIVISION OF  
PARTS OF THE PROPERTY OF THE  
ARLINGTON COUNTY BOARD  
DEED BOOK 246 PAGE 33, AND DEED BOOK 1299 PAGE 134

ARLINGTON COUNTY, VIRGINIA