Lewis Creek Technical Advisory Committee Meeting #3

August 18, 2021

Attendees

Tom Yeago (LCWAC)
Randolph Bertin (LCWAC)
Pete Kesecker (City of Staunton)
Martha Gibbons
Sara Bottenfield (VA DEQ)
Nesha McRae (VA DEQ)
Bill Jones
Fred Blanton (LCWAC)
Ben Bradley (Stantec for VDOT)
Tara Wyrick (VA DEQ)
Mark Richards (VA DEQ)

Meeting Summary

Nesha McRae and Mark Richards welcomed participants and explained that the intent of the meeting was to solicit final comments on the draft TMDL document from advisory committee members. The group was asked for general comments about the document to begin the discussion. One participant expressed concerns about the extent of data points available for the study. He noted that while he understands that there are issues with the cost of PCB monitoring, it is unclear if we have a suitable amount of data to complete a project like this. Mark Richards responded that DEQ would certainly like to have more data from Lewis Creek, but that cost is definitely an issue. DEQ completed monitoring of water (low and high flow), sediment and fish throughout the watershed. Mark explained that he considers the extent of data collected to be sufficient for purposes of completing the TMDL study. DEQ has multiple PCB TMDL projects underway across the state right now and sampling costs are very high. This really limits the extent of monitoring we can do in each project area.

Another participant asked whether there is a more detailed timeline associated with the phases identified in the TMDL study. Mark explained that the TMDL does not include an explicit timeline, and that this was an intentional decision. The timeline of the CSX project will drive Phase I of TMDL implementation, and EPA's TSCA program will really govern this timeline. Concerns were expressed regarding assurances that implementation efforts would move forward in the absence of a concrete timeline associated with PCB reduction targets in the TMDL.

A participant asked why are the PCB criteria applied by DEQ and VA Department of Health (VDH) are different. Mark explained that DEQ follows EPA guidelines for water quality criterion. VDH includes other assumptions in their calculations including factors such as PCB loss through cooking of fish. Mark noted that while there is a disconnect between the criteria, the complexity of the issue makes this sort of correlation challenging to clarify. DEQ's criteria is designed to prevent waters of the state from being contaminated, VDH's is designed to address existing contamination.

A participant asked why more details regarding clean-up efforts at the CSX site were not included in the TMDL study, expressing concerns that the clean-up will not be completed in a manner that is consistent with the PCB reduction targets of the TMDL. The participant asked what we know about where the soil is going that is removed from the CSX site, noting that details like this should be included in the report. Mark Richard responded that clean-up efforts at the CSX site are being managed in part by staff in DEQ's Voluntary Remediation Program (VRP). TMDL and VRP staff have worked closely on the Lewis Creek PCB TMDL in order to ensure that the clean-up goals are consistent with those of the TMDL. VRP staff has

attended both of the previous Lewis Creek TAC meetings. Staff also provided updates on progress at the CSX site at both meetings.

A participant asked why the report does not clearly detail all of the steps that we need to take to reach target reductions. He felt that inclusion of these steps would help to ensure that the process continues to move forward in accordance with the goals of the TMDL. Mark explained that normally we have more permitted sources of PCBs in watersheds where DEQ has developed PCB TMDLs. In Lewis Creek, we only have MS4 permits. Typically, the permitting process for facilities that receive a wasteload allocation for PCBs is a real driver for implementation of remediation measures. For Lewis Creek, it is expected that remediation efforts at the CSX site and by MS4 permittees (using a local TMDL Action Plan) in the watershed will be the real drivers for implementation. Nesha McRae added that we do not include too much detail about step-by-step remediation efforts since this process is governed by other DEQ programs. Typically, the TMDL study references these programs, and DEQ program staff work to ensure that implementation efforts are coordinated across programs. While the TMDL report references these efforts, it does not include the level of detail found on MS4 permit and VRP project materials.

A participant asked how long it takes PCBs to degrade naturally. Mark responded that those that are move heavily chlorinated tend to stick around longer, those with 1-2 chlorine molecules volatilize into the atmosphere more rapidly.

A participant asked who is guiding CSX's actions with respect to remediation. Since they have enrolled in a voluntary remediation program, does this mean that implementation actions are to be completed on a voluntary basis? Mark responded that DEQ VRP staff are working closely with EPA TSCA and CSX on mitigation efforts. DEQ works with property owners through this program to establish a certain concentration that they want to clean up to, that is consistent with water quality standards. Once this is established, they perform remediation efforts and monitor around the area of remediation until they reach these targets. The real objective of remediation efforts is to keep upland sources from making their way into the stream. A participant asked whether there are resources available to property owners who suspect they have PCB contamination on their property and are interested in completing a site assessment and potential clean up. Mark responded that while DEQ has staff who can provide technical assistance with an effort like this, there are associated costs for which the property owner will be held accountable. It is difficult to know what these costs are likely to be until a site assessment has been completed and the extent of contamination is better understood. The City of Staunton's recent Brownfields Grant may assist property owners within priority areas who are interested in completing site assessments.

A participant asked about next steps in the process, noting that members of the TAC would like to continue to be updated on progress in implementation efforts at the CSX site. Nesha McRae suggested that the Lewis Creek Watershed Advisory Committee could provide the necessary structure for ongoing communication about remediation efforts at the CSX site, and TMDL implementation as a whole. She offered to provide assistance in coordinating this effort.

Mark and Nesha thanked participants for their comments and the meeting was adjourned.