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April 21, 2020

Justin Tincher
Environmental Resources Specialist 3
2031 Pleasant Valley Road
Fairmont WV, 26554

Re: Corrective Action Plan – Pilot Test
Facility ID #1-501418
Leak #16-039
Gas For Less/Valero
981 Cove Road
Weirton, West Virginia 26062

Dear Mr. Tincher:

On August 9, 2016, a release was suspected after a vehicle struck a dispenser and damaged the plumbing, resulting in a release of an unknown quantity of diesel at the dispenser island. A suspected release was reported to the WVDEP on August 10, 2016. Repairs were made to the damaged dispenser on August 30, 2016 by McRo Construction, Inc. At the time of the repairs, approximately 0.85 ton of impacted soil was excavated and removed from beneath the diesel/kerosene dispenser via hand excavation and staged at the site for proper disposal. The depth of the excavation was approximately 3.5 feet below grade.

The release was confirmed after a soil sample collected from beneath the dispenser (soil sample D-1) indicated a Total Petroleum Hydrocarbons-Diesel Range Organic concentration exceeding the WVDEP Target Cleanup Level. Following receipt of laboratory analysis, the incident was reported as a confirmed release to the WVDEP on September 26, 2016. The volume of diesel fuel released is unknown.

Letterle & Associates, Inc. (Letterle), was retained by Gas For Less, Inc. (Gas For Less), in November 2016 to complete site assessment activities and related reporting regarding the August 2016 release of diesel fuel at the Gas For Less Valero facility. On February 22, 2018, Letterle submitted a combined Primary Site Assessment Report (PSAR) and Corrective Action Plan (CAP) to the WVDEP. On February 28, 2018, the WVDEP approved the Revised PSAR and CAP.

The current goal of the corrective remedial action is the attainment of the WVDEP target compound levels (TCLs) for petroleum-impacted sites remediated through Corrective Action, as included in the West Virginia Guidance Document for Leaking Underground Storage Tank Site Assessments and Corrective Actions. For petroleum-impacted groundwater, the following WVDEP TCLs apply:

- Benzene (5 µg/l)
- Toluene (1,000 µg/l)
- Ethylbenzene (700 µg/l)
- Xylenes (10,000 µg/l)
- methyl tertiary-butyl ether (MTBE, 40 µg/l)
- Tertiary-butyl-alcohol (tBA, 360 µg/l)

Letterle is proposing a pilot test for vacuum extraction entailing two vacuum pumping events and associated tasks at the Gas for Less/Valero site at 981 Cove Road, Weirton, West Virginia 26062.

Letterle will conduct the following tasks:

- Conduct a two-day vacuum pumping pilot test event at the site on select injection and monitor wells.
- Procure and coordinate with subcontractors and property owner, and arrange waste disposal approval for the two day vacuum pumping event.
- 24 hours prior to the first day pumping event, Letterle personnel will place automatic transducers in five monitor wells (MW-1 through MW-5). The transducers will remain in the wells during the vacuum pumping event on day one, and will be removed in the morning of the second day vacuum pumping event prior to the test.
- On day one of the vacuum pumping test, Letterle will subcontract with a vacuum truck company (Saracon, L.P.), connect the fittings to the wells, and oversee an 8-hour vacuum event from injection wells IW-1D, and IW-2D. Water levels will be collected periodically from the monitor wells. A 2,500- gallon vacuum truck will be used for the test, and the event will be concluded at the end of 8 hours, or when the vacuum truck has extracted 2,500 gallons of water. The vacuum truck will exit the site, and the extracted groundwater will be disposed of at a certified waste disposal facility.
- On day two of the vacuum pumping event, the transducers will be removed, and the event will be conducted solely on monitor well MW-5. As with the previous day, the vacuum event will be conducted for eight hours, water levels will be collected periodically from monitor wells MW-1 through MW-4, and the event will be concluded at the end of 8 hours, or when the vacuum truck has extracted 2,500 gallons of water. The vacuum truck will exit the site, and the extracted groundwater will be disposed of at a certified waste disposal facility.
- One week following the vacuum pumping events, Letterle will collect a quarterly groundwater sampling event. The usual sampled parameters will be analyzed (BTEX, MTBE, PAHs, and TBA), along with two QA/QC samples,
- Within 45 days of the vacuum pumping and groundwater sampling events, Letterle will prepare a vacuum pumping event summary, which will be presented in the following Corrective Action Progress Report. The summary will include figures, tables with water level readings, groundwater sampling data, and transducer information, number of gallons of groundwater extracted, and waste disposal certificates.

If the results of the pilot testing yield favorable results an amended CAP will be submitted for approval.

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Mr. Tincher

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If you have any questions or need additional information, please call Eric Itle, Project Manager, at 412.486.0600 extension 302.

Sincerely,

LETTERLE & ASSOCIATES

Peter Weir

Senior Project Scientist