Re: Gable Farms Environmental Soil Characterization Report Review
Gable Farms, Gable Farms Lane, Hamilton, Virginia

Dear Mr. Stultz:

The Department of Environmental Quality (DEQ), Northern Regional Office received the correspondence dated November 17, 2020, regarding the soil sampling performed at the Gable Farms Property, Gable Farms Lane, Hamilton, Virginia. DEQ has reviewed the Environmental Soil Characterization Report, dated July 22, 2020; and the Technical Memorandum – Gable Farm Soil Characterization Report Review, dated October 21, 2020; and has the following observations:

1. During the original site visit, staff did not encounter any visible evidence of contamination and concluded that the material appears to be exempt under the Virginia Solid Waste Management Regulations (9VAC 20-81), as per: 9VAC20-81-95.C.7.n - “Uncontaminated concrete and concrete products, asphalt pavement, brick, glass, soil, and rock placed in commerce for service as a substitute for conventional aggregate.” and 9VAC20-81-95.D.11 – “Using rocks, block, dirt, broken concrete, crushed glass, porcelain, and road pavement as clean fill.”

2. Thirty-four soil samples were collected and analyzed for a variety of analytical parameters. While the facility is not enrolled in the Voluntary Remediation Program, the analytical results were compared to the Tier III risk screening levels. None of the samples for volatile organic compounds, polychlorinated biphenyls, or RCRA metals were above the screening standards.
3. The presence of asphalt at the property was confirmed during the DEQ site visit on February 22, 2019, and asphalt was encountered in several soil borings taken as part of the investigation. Asphalt is listed as a conditionally exempt material in the regulations and is not subject to the requirements of 9 VAC 20-81-660, *Soil contaminated with petroleum products*.

4. Based upon the information provided in the aforementioned reports, DEQ does not change the determination made in the February 22, 2019 memo.

If you have any questions, or require additional information regarding this matter, please contact me at 703-583-3813, or at richard.doucette@deq.virginia.gov.

Respectfully,

Richard Doucette
Land Protection and Revitalization Program Manager

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