



REGION 3

PHILADELPHIA, PA 19103

DOCUMENTATION OF LONG-TERM STEWARDSHIP ASSESSMENT

RCRA Corrective Action

Long-term Stewardship RCRIS code: CA88P2

Completed by: Kevin Bilash

Date: 9/26/25

Global Companies LLC-Fairfax Terminal (formerly Motiva Enterprises, Star Enterprises)

EPA ID VAD093952935

3800 Pickett Road

Fairfax, VA 16033

Long-term Stewardship Assessment Summary:

On July 29, 2025, the United States Environmental Protection Agency's (EPA) Land, Chemicals, and Redevelopment Division representative, Kevin Bilash, conducted a long-term stewardship (LTS) assessment site visit of the Global Companies LLC (Global) Fairfax Terminal (Facility) in Fairfax, VA.

The EPA determined that Global is in compliance with the EPA's Record of Decision (ROD), inclusive of the Administrative Order (AO) Docket CWA-III-003-CW, R; Administrative Order by Consent (AOC) Docket RCRA-3-004-IT, S; and Statement of Basis (SB). The EPA concludes that the objectives of protection of human health and the environment are being achieved. Global will continue to implement the approved On-Site Long-Term Groundwater Monitoring Plan and comply with the EPA ROD.

Introduction:

LTS refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the Resource Conservation and Recovery Act (RCRA) Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance with the final decision.

Facility Background:

Global Companies, LLC (formerly Star Enterprises, Motiva Enterprises) Fairfax Terminal is located at 3800 Pickett Road, Fairfax City, VA 22031. The Facility is one of four oil distribution terminals located on Pickett Road. The Facility has nine 1-2 million gallon above-ground tanks that supply petroleum to the region at a rate of about one million gallons per day. The Facility location is presented on Figure 1.

An underground petroleum tank leak from the Facility was discovered in 1990. The leak had resulted in light non-aqueous phase liquid (LNAPL) impacts to the subsurface and a petroleum-contaminated groundwater plume exceeding the EPA's Maximum Contaminant Levels (MCLs) that extended 2000 feet from Pickett Road to the Mantua community. Under the EPA's direction, construction of an interim groundwater remediation system to clean up the petroleum-contaminated groundwater began shortly thereafter and became operational in 1991. Subsequently, the system was expanded in 2000 per the ROD to include two components: the Facility side (onsite system) and the Mantua community side (offsite system).

In April 2009, the offsite system was powered down as part of a system shutdown test. In November 2012, Global submitted the *Offsite Remediation and Containment System Shutdown and Long-Term Groundwater Monitoring Work Plan* to the EPA, in which a permanent shutdown of the offsite system was proposed. The EPA approved the shutdown in correspondence dated August 20, 2013. The Stockbridge Remediation System (SRS), Mantua Segmented Trench System (STS), Tovito Well Barrier System, and five (5) horizontal wells (collectively the "offsite system") were decommissioned, removed, and abandoned by March 2017.

The EPA most recently performed an LTS Assessment on August 30, 2016 when Motiva Enterprises owned and operated the Facility. The 2016 LTS Assessment passed for continued protection of human health and the environment. Since that time, several updates to the remediation system and groundwater monitoring requirements have been approved by the EPA as follows.

On September 16, 2019, Global submitted the *Revised Onsite Remediation and Containment System Shutdown and Long-term Groundwater Monitoring Work Plan* to the EPA. In November 2019, the EPA approved the request to permanently shut down the Remediation and Containment System, abandon unused wells and vaults, and remove related structures (collectively the "onsite system") in accordance with state and local protocols. The EPA long-term groundwater monitoring requirements were established in this report and approval.

In January 2020, Global submitted a request to the Virginia Department of Environmental Quality (VADEQ) for a reduction in annual monitoring requirements. In February 2020, the following requests were approved: the number of monitoring wells gauged and sampled reduced from thirty-seven (37) wells to nineteen (19) wells; laboratory analyses of annual groundwater samples reduced to benzene only; and low-flow purging/sampling

techniques for annual groundwater sampling were approved. Monthly gauging and groundwater elevation measuring requirements remained unchanged.

On 4/19/21, Global submitted an Off-site Monitoring Well Sampling Summary. The EPA could not locate this document in our files. On June 18, 2021, the EPA approved the Off-Site Monitoring Well Sampling Summary. In August 2021, the following offsite wells were abandoned as a result of this approval: MW-048, MW-060, MW-061, MW-064, MW-088, MW-090, MW-096, MW-103, MW-106, MW-134, and MW-152.

In December of 2021, the VADEQ granted a reduction in the number of wells to be gauged and sampled. The wells that were removed from the list are P-004, P-010, MW-054, and MW-057. This reduced the number of wells to be gauged and sampled from nineteen (19) to fifteen (15) wells.

On January 19-20, 2023, GES oversaw the abandonment of offsite wells MW-047, MW-049, MW-058, MW-066, MW-174, and MW-177. These offsite wells were located across Pickett Road, east of the Terminal. In historical reports, these wells had been reported as abandoned but were found to be active monitoring wells during field verification by GES. Abandonment of these monitoring wells had been previously approved by the EPA, in correspondence dated August 20, 2013.

On March 22, 2023, GES and Global met with the EPA via conference call to discuss the project status. During that call, the EPA approved the abandonment of CH-012 and CH-018, located on the TransMontaigne property to the north of Global. On June 19, 2023, GES oversaw the abandonment of offsite wells CH-012 and CH-018 located at the TransMontaigne facility located north of the Facility. The EPA indicated that MW-075 should continue to be sampled until benzene concentrations remained below the EPA MCLs for three to four rounds of sampling and that the LNAPL in recovery wells RW-035 and RW-036 should continue to be gauged and bailed until LNAPL thicknesses remain below 0.25 feet for several months of gauging events. Finally, GES and Global requested a letter from the EPA to the offsite property owner located at 3851 Pickett Road to explain the need for the abandonment of monitoring wells MW-072 and MW-131. To date, an EPA letter has not been delivered.

On June 26, 2023, GES oversaw an enhanced fluid recovery (EFR) event on wells with measurable LNAPL, MW-098, RW-35, and RW-36, in an effort to try to reduce LNAPL thicknesses in these wells. On July 27, 2023, a second EFR event was completed on the same wells. The amount of LNAPL removed could not be measured but is assumed to have been minimal compared with the total LNAPL and water volume removed of 250 gallons. However, overall LNAPL thicknesses were generally reduced following the events.

On December 21, 2023, Global purchased the Motiva Fairfax Terminal and has assumed liability for continued remedial actions associated with DOCKET NO. 111-93-003-CW, R. The Facility will continue to operate in its current capacity.

Implementation Mechanism(s):

The Implementation Mechanism is the method for implementing Institutional Controls (ICs) and Engineering Controls (ECs) and other continuing obligations required as a condition of the Final Decision. In the case of Global, the implementation mechanism is the ROD, inclusive of the AO, EPA Docket Number CWA-III-003-CW, R.

Institutional Controls:

No institutional controls are required per the ROD. While the AO more closely fits the term Implementation Mechanism as described in this LTS, the EPA's *Institutional Controls: A Site Manager's Guide to Identifying, Evaluating and Selecting Institutional Controls at Superfund and RCRA Corrective Action Cleanups* September 2000 guidance considers an Order as a type of institutional control, specifically under *Enforcement and permit tools with IC components*. The AO remains in effect and is determined to be an active IC for purposes of this LTS. To be consistent with current practice, a full review of the risk assumptions made in the Human Health and Risk Assessment and relied upon by the EPA as quoted in the SB "The EPA risk assessment adopted a fundamental exposure assumption that the current conditions will not change with time. This implies that the media concentrations will remain constant, the assumed exposure pathways will remain the same...[emphasis added]" should be reviewed for possible consideration to adding certain site use restrictions (groundwater use restriction while levels exceed the EPA MCLs and a residential use restriction to assure continuation of property use).

Engineering Controls:

Following approval of the permanent shut-down and abandonment of both the off-site and on-site systems, the remaining engineering control that exists, per the AO, is assuring site security. Details are not included in the AO, therefore, the EPA has determined "site security" to mean fencing and site security for purposes of this LTS.

Financial Assurance:

Financial Responsibility is required per Section XII of the AO. The most recent financial assurance submittal located in the EPA's records was from Motiva submitted in 2020 for a Corrective Action Cost Estimate of \$620,980. The EPA has not located financial responsibility documentation submitted by Global to date required per the AO. The First Half 2025 Semi-Annual Groundwater Monitoring Report notes that On December 21, 2023, Global purchased the Motiva Fairfax Terminal and has assumed liability for continued remedial actions associated with DOCKET NO. 111-93-003-CW, R [CWA-III-003-CW, R].

Reporting Requirements/Compliance:

Semi-Annual groundwater reports are submitted to the EPA and VADEQ to confirm the efficacy of the implemented remedy to cleanup groundwater contamination and control offsite migration and to ensure compliance with the ROD. Requirements for the EPA are documented in the approved On-Site Long-Term Groundwater Monitoring Plan.

Global submitted the First Half 2025 Semi-Annual Groundwater Monitoring Report on May 16, 2025 and remains in compliance with this reporting requirement. Analytical results indicated that benzene was detected in eight (8) of the sixteen (16) wells sampled, with concentrations ranging from 2.5 micrograms per liter (µg/L) in monitoring well MW-055 to 540 µg/L in monitoring well MW-046. Benzene was also detected in offsite monitoring well MW-075 at a concentration of 21.0 µg/L. Toluene was detected in four (4) of the thirteen (13) wells sampled, with concentrations ranging from 0.56 µg/L in monitoring well MW-055 to 160 µg/L in monitoring well MW-046. Ethylbenzene was detected in four (4) of the thirteen (13) wells sampled, with concentrations ranging from 6.7 µg/L in monitoring well MW-046 to 17.0 µg/L in monitoring well P-006. Total xylenes were detected in three (3) of the thirteen (13) monitoring wells sampled, with concentrations ranging from 0.50 µg/L in monitoring well MW-055 to 72 µg/L in monitoring well MW-046. Monitoring wells with benzene concentrations detected during the April 14 through 17, 2025 sampling event were analyzed for trends using a Mann-Kendall test. Of the four (4) monitoring wells with detections, MW-043, MW-055, and CH-008 showed “decreasing” trends. Well P-006 (non-detect for benzene) showed a “probably decreasing” trend. Offsite well MW-075 showed “no trend”.

Mapping:

A geospatial mapping of the site layout has been completed and is presented in Figure 2.

Current Site Use:

The EPA is the lead agency that provides oversight of Corrective Action activities at the Facility with significant support, coordination, and assistance from the VADEQ. The Facility continues to be an active and operating oil distribution terminal. Use of this Facility has remained unchanged throughout the EPA’s and VADEQ’s oversight.

Long-term Stewardship Site Visit:

On July 29, 2025, the EPA conducted an LTS site visit with VADEQ and representatives from Global, their consultant, and the City and County of Fairfax to discuss and assess the status of the implemented remedy. The site visit began at 9 AM in a Facility conference room. A sign-in sheet identifying all the representatives and their respective organizations that were in attendance is included as Attachment A. Introductions were made and the EPA explained the purpose of the LTS site visit.

The following topics and agreements or conclusions (and follow up information submissions where applicable) were discussed as a result of the record review determinations discussed above:

File review:

1. Financial assurance. Global is checking into if previous submissions were sent and we discussed the possibility of terminating the need for FA. This will be discussed further upon receipt of a current cost estimate being prepared by GES.

2. 4/19/21 Off-site Monitoring Well Sampling Summary report was not located in the EPA files. The EPA requested a copy and GES provided this report via email on 7/29/25.
3. GES inquired about the requested EPA letter to a property owner to be able to abandon wells MW-072 and MW-131. GES mentioned the previous project manager said they would provide the letter but this was not completed. The EPA will discuss with its management and should close this loop.

Global First Half 2025 Semi-Annual Groundwater Monitoring Report submitted May 16, 2025.

1. The approved On-Site Long-Term Groundwater Monitoring Plan mentions that monitored natural attenuation (MNA) along with contaminant trends and other data will be used to verify plumes remain within Facility boundaries. Certain MNA parameters were noted on field logs but no discussion of MNA was included in the report. The EPA requested GES include that in future reports. GES agreed. The report only included a discussion of contaminant trends. Supporting information (graphs, evaluation tool output, etc.) should also be included in future reports.
2. Verbal approval to abandon CH-012 and CH-018. The EPA requested that Global provide available information (file notes, attendee list, etc.) to support this decision and provide for the EPA records. GES provided a copy of an email confirmation to the EPA regarding this via email on 7/29/25.
3. Engineering Controls. The EPA explained that the AO requires “site security” and that the EPA determined this to mean fencing and security. These are currently in-place as confirmed during the site visit but not systematically documented by Global. The EPA requested that Global add language to report submissions to confirm site security is being maintained. Global agreed. As an example of future documentation and to confirm current compliance, Global provided one per month for the last year of daily site reconnaissance notes confirming security features are intact via email on 7/29/25. This included the fence and signage. The EPA requested that Global expand to include security camera operation confirmation. Global agreed.

AO termination and Facility oversight transfer to VADEQ:

1. This request was raised previously directly to the EPA by VADEQ due to the fact that the ongoing actions are able to be captured by their regulations.
2. Land use restrictions and requirements (in line with the EPA’s comments in the ICs section above) are likely able to be added (to capture UECA, FA, ECs, ROD assumptions) to the VADEQ document requirements. The agencies should discuss and confirm each detail.
3. Fairfax supports the transfer but wants to assure groundwater is clean due to neighboring property redevelopment. The expected use as proposed is a warehouse. GES referenced the Semi-Annual Groundwater Monitoring Report and noted that the one well that exists on that property is below MCLs. The agencies have no concern of impacts on the property as a result of the Facility release and remediation. The VADEQ explained that additional closure requirements will be required by their regulations for that property owner to assure protection of human health and the environment.
4. Global supports the transfer in part because the AO raises questions in other regions during permit applications or financial discussions. This is likely due to the uncommon

situation of having a Resource Conservation and Recovery Act and Clean Water Act Order on a tank terminal Facility.

5. The EPA will consider the request to transfer the Facility from RCRA Corrective Action to the VADEQ Tanks program. The EPA noted that it cannot guarantee a timeframe to address the request as it will require a resource commitment and counsel review to determine a mechanism to terminate the Order as the explicit goals of the ROD (neither MCLS nor LNAPL thickness) have been met throughout the Facility.
6. Global raised the question as to whether there are two orders or one. The EPA explained that it viewed it as one order. The AO incorporated the previous AOC into it. This will be confirmed during termination discussion with the EPA counsel.

The attendees walked the grounds of the Facility. Several monitoring wells were inspected including these underlined ones (P-006, MW-037, MW-055, CH-008, MW-043, and MW-075) required to be sampled per the EPA approved Groundwater Monitoring Plan. Additionally, MW-029 was inspected. The wells appeared to be operational and properly maintained. The site security features were observed and noted which include fencing, video monitoring, and signage noting surveillance and 24-hour operation with emergency contacts included. The EPA suggested as part of the AO site security component that Global add locks to the wells. Global agreed. Attachment B contains pictures of the site security components and inspected wells. Attendees returned to the conference room and the site visit concluded at approximately 11 AM.

Conclusions and Recommendations:

The EPA has determined that Global is in compliance with the ROD. The EPA's determination confirms that the objectives of protection of human health and the environment are being met by the ongoing actions. Global will continue to implement the approved On-Site Long-Term Groundwater Monitoring Plan and comply with the EPA ROD.

The Facility web fact sheet with additional information and available documents can be downloaded at <https://www.epa.gov/hwcorrectiveactioncleanups/epa-rcra-id-vad093952935>.

Files Reviewed:

First Half 2025 Semi-Annual Groundwater Monitoring Report, GES, May 16, 2025
Congressional Response regarding redevelopment, EPA, January 23, 2025
Off-Site Monitoring Well Sampling Summary approval letter, EPA, June 18, 2021
Onsite Remediation System Shutdown approval letter, EPA, November 7, 2019
On-Site Remediation and Containment System Shutdown and Long-Term Groundwater Monitoring Work Plan, Sovereign Consulting Inc., July 2019
Long-Term Stewardship Assessment, EPA, August 30, 2016
Offsite Remediation System Shutdown approval letter, EPA, August 20, 2013
Record of Decision, EPA, February 1999
Statement of Basis, EPA, April 1998
Amendment to Administrative Order, EPA Docket Number CWA-III-003-CW, R, 8/16/93
Administrative Order, EPA Docket Number CWA-III-003-CW, R, 4/9/93

First Amendment to Administrative Order by Consent, Docket Number RCRA-3-004-IT, S, 5/11/92

Administrative Order by Consent, Docket Number RCRA-3-004-IT, S, 9/23/91

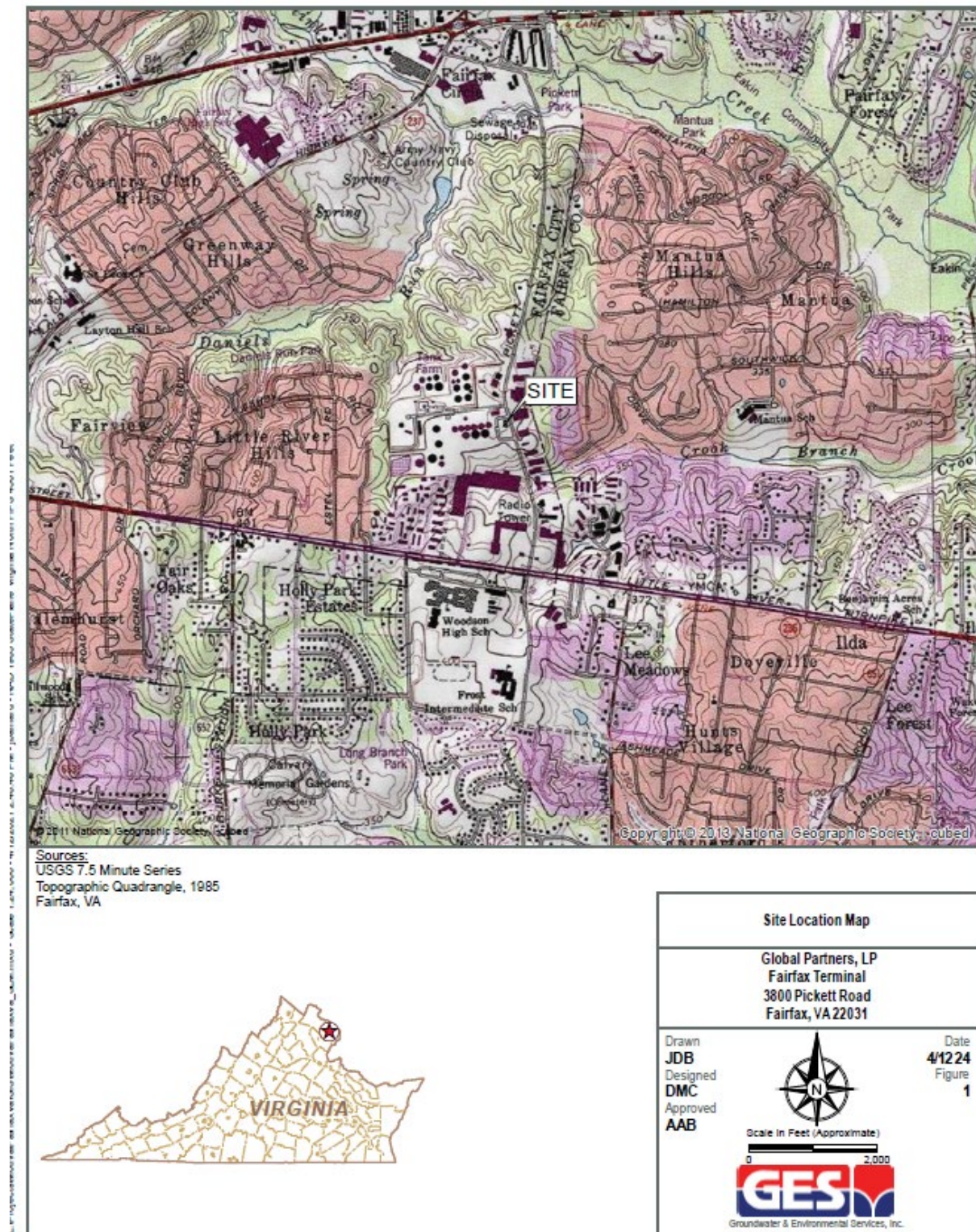


Figure 1 Site Map



Figure 2 Geospatial Map of the Facility

Table 1
Corrective Action Remedy Summary
Areas of Implemented Engineering and Institutional Controls

Facility Name	Global Companies LLC-Fairfax Terminal (formerly Motiva Enterprises, Star Enterprises)			
Address	3800 Pickett Road, Fairfax, VA 16033			
EPA ID Number	VAD093952935			
Are there restrictions or controls that address:	Yes	No	Areas	Discussion notes
Groundwater		X	Facility and Area wide	Assumptions made in ROD that groundwater could be used therefore need to remediate until MCLs. Previously impacted off-site residential areas are now on the public water supply.
Residential Use		x	Facility	Assumptions made in ROD that risks evaluated would not change. This is likely continued use as terminal and no residential use. EPA did not review the Risk Assessment in preparation of the LTS site visit.
Excavation		x	Facility	Assumptions made in ROD that risks evaluated would not change. This is possibly relying on Facility PPE requirements. EPA did not review the Risk Assessment in preparation of the LTS site visit.
Vapor Intrusion		x		No concern identified through sampling
Capped Areas		x	N/A	
Other Engineering Controls	x		Fence, security cameras, signage	AO requires "site security"

Other Restrictions		x		
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LTS Checklist

<u>IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?	x		ICs not specified in ROD, but AO is an IC
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	x		AO
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?	x		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	x		However, to be consistent with current practice, consideration should be given to adding certain site use restrictions like a groundwater use restriction while levels exceed EPA MCLs and a residential use restriction to assure continuation of property use and risk assumptions made in the Human Health and Risk Assessment and relied upon by EPA in the SB
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		x	
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)		x	
• Are there plans to develop or sell the property?		x	None for Facility. There was discussion about redevelopment off-site in the formerly impacted Mantua community. EPA prepared a congressional response to a request regarding this in Jan 2025. Note that off-site well MW-

			152 that EPA approved for abandonment in 2021 had decreasing trends in 2018 but a benzene concentration of 323 ug/L. As noted above, this well was abandoned in August 2021.
• Have all reporting requirements been met?		x	Financial Responsibility per AO

<u>Groundwater Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is groundwater onsite used for potable purposes?		x	
• Is the Facility connected to a public water supply?	x		Reference to this fact located in EPA's November 7, 2019 Onsite remediation system shutdown approval letter and confirmed verbally at site meeting
• Have any new wells been installed at the facility?		x	
• Are the current groundwater flow rate and direction similar as mentioned in the previous studies?	x		See semi-annual groundwater monitoring reports flow direction discussions
• Groundwater contaminants stable or decreasing in concentration?	x		See semi-annual groundwater monitoring reports trend evaluations but EPA requests supporting information be included in future reports
• Are groundwater monitoring wells still in place (# wells)?	x		See photos and semi-annual groundwater monitoring reports
• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?		x	
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?		x	Two off-site wells need to be properly abandoned. Property owner requests a letter from EPA supporting

			this and to date no letter has been sent by EPA.
• Is there evidence of monitored natural attenuation (MNA) occurring in groundwater?	-	-	TBD – Global will add MNA evaluation discussion to semi-annual reports per 2019 Plan
• Has (active remediation system) been maintained as necessary?			N/A – EPA approved the permanent shut down and abandonment of all systems
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			N/A – EPA approved the permanent shut down and abandonment of all systems
• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?		x	No groundwater restrictions required per ROD

<u>Surface and Subsurface Soil Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the facility being used for residential purposes?		x	
• Have there been recent construction or earth-moving activities or plans for such?		x	

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have geosynthetic/vegetative landfill caps (name) been properly maintained?			N/A to remedy
• Have any repairs been necessary? (i.e. regrading, filling, root removal)			N/A to remedy
• Is the leachate collection system operating and effectively preventing groundwater contamination?			N/A to remedy

<u>Vapor Intrusion Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have there been construction of new structures within the vapor intrusion restriction zone(s)?			N/A to remedy
• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?			N/A to remedy

<u>Miscellaneous Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is Site security provided?	X		“Site security” required to be “provided” per AO. EPA determined this to mean fencing and security. Confirmed during site walk to include fence and 24-hour security camera notification.
• Is the appropriate signage posted?			N/A to remedy

Appendix A

Sign-in sheet

Appendix B

Photos



1. Site security (fence, cameras, no trespassing sign, 24-hour emergency contact info)



2. Monitoring Well MW-29 (outside security fence)



3. Monitoring Well MW-37 (outside security fence)



4. Monitoring Well MW-43 (inside security fence)