



**UNITED STATES**  
**ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**STATEMENT OF BASIS**  
**FORMER AIRCO WELDING PRODUCTS**  
**RURAL RETREAT, VIRGINIA**  
**EPA ID NO. VAD 066 020 439**  
**June 10, 2009**

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## **I. INTRODUCTION**

### **A. Facility Name**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Former Airco Welding Products Facility located at Route 616, Rural Retreat, VA, 24368 (hereinafter referred to as the Facility) EPA ID No. VAD066020439.

The Facility is subject to the 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. Sections 6901 to 6992k. 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 waste constituents that have occurred at their property.

Information on the Corrective Action Program can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

### **B. Proposed Decision**

This SB explains EPA's proposed decision that Corrective Action is complete and no land use controls are required for the Facility. EPA's proposed decision is based on a review of EPA and Virginia Department of Environmental Quality (VDEQ) files regarding the environmental history of the Facility as presented in the Final RCRA Site Visit Report submitted on February 18, 2009. Based on this review, EPA has concluded that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility.

### **C. Importance of Public Input**

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy selection by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. A copy of the AR is available for public review from the EPA Region 3 office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

## **II. FACILITY BACKGROUND**

The Former Airco Welding Products Facility was operational from 1976 through 1984 as a manufacturer of gas welding products. Airco's operations included forging, machining, and drilling of copper material for the fabrication of gas welding torch heads and cutting torch heads.

Airco Welding Products was purchased and moved operations to Portsmouth, Virginia between 1982 and 1983; however, they continued to lease the property for a period of 1 to 2 years after vacating the Facility. The property has subsequently been occupied by Standard Motor Parts (EIS Brake Parts) from 1985 until 1996, Camrett Logistics from 1996 until 2006, and Mid-Atlantic, Inc. from October 2006 until the present. The property was sold to PAW Industrial Properties, LLC in 2003. In 2006, PAW Industrial Properties ceased operations at the site and currently leases office space and the distribution warehouse for storage. There are currently no manufacturing operations conducted at the Facility site.

The Former Airco Welding Products Facility is located in a business park, surrounded by agricultural and residential properties. The 5-acre Facility consists of a warehouse, asphalt parking, gravel driveways and parking lots, a concrete-paved truck loading area, and undeveloped vegetated land.

A surface water stream transects the property from the northwest to the southeast and is located to the south of the Facility site building. Based upon a 2002 Phase I Environmental Site Assessment, wetlands are present along the stream. The stream is a source of public water supply for the Town of Rural Retreat.

## **III. SUMMARY OF ENVIRONMENTAL HISTORY**

According to RCRA INFO, an EPA/VDEQ database, Airco operated as a large quantity generator (LQG) of hazardous waste under RCRA Regulations and operated under interim status from November 19, 1980 until the plant closed in February 1984. The Facility's financial assurance was released and interim status terminated in December 1985.

Airco operated a hazardous waste drum storage unit on an asphalt area for the storage of ignitable and corrosive materials. Airco also operated a treatment tank, which qualified as a totally enclosed elementary neutralization system. An onsite wastewater treatment Facility (acid neutralization and solids removal) was also operated. Initially, the Airco Facility submitted a RCRA Permit Application for the operation of a drum storage area and the tank treatment neutralization area as hazardous waste management units under the RCRA Regulations. However, administrative record correspondence dated July 22, 1985, documented the tank area was subsequently determined to be an exempt neutralization unit under the RCRA Regulations.

The Airco Facility decontaminated the Solid Waste Management Units (SWMUs) at the Facility in 1984. A closure site inspection of the decontaminated and closed SWMUs was performed by the Virginia Department of Health (VDH), Bureau of Hazardous Waste Management, predecessor to the VDEQ in November 1984.

A Closure Plan for the SWMUs was received by the VDH on February 12, 1985. A Closure Report for decontamination and closure of the SWMUs was submitted to the VDH on February 21, 1985. The Facility submitted closure certification for the container storage SWMU by letter, on July 1, 1985, and the "clean closure" certification was deemed acceptable by the VDH on July 22, 1985. This letter, also documented the tank treatment unit was exempt or excluded from the RCRA Regulations and not subject to RCRA closure. The "clean closure" of the container storage SWMU was deemed acceptable in July 1986.

EIS Brake Parts operated as a small quantity generator (SQG) of hazardous waste under EPA ID No. VAD988200101. Hazardous wastes were collected and stored on-site until removal by a privately licensed hazardous waste hauler to a treatment, storage, and disposal (TSD) facility.

In 2002, an oily sheen and some floating oil were observed in the stream at the southern portion of the property; the stream banks were oil-stained and exhibited a petroleum odor. The oil was traced back to a floor drain discharge pipe from the Facility; however, no oil source was identified. The oil contamination was clean-up. Facility representatives indicated that the floor drains did process water through an oil-water separator prior to discharge to Rural Retreat's publicly owned treatment works (POTW).

In response to the above oil release incident, Mid-Atlantic, one of the current occupants of the property, currently conducts periodic water sampling and testing events to ensure protection of water quality in the stream, as it is a source of public water supply for the Town of Rural Retreat.

The Facility maintained two underground storage tanks (USTs) for fuel oil storage. The tanks were used by EIS and possibly Airco for process equipment fueling. The 2,000 and 3,000-gallon tanks were installed in 1976 and 1995 respectively. At the time of the August 2008 site visit, the tanks contained heating oil; however, the USTs were slated to be removed from the site in February 2009, pending conversion from oil to gas heat in the building. Quarterly tank tightness testing was reportedly performed by the oil delivery company; the Facility representative had indicated the tanks were intact and no releases had been reported.

However, according to the April 2009 Limited Site Characterization Report, a release of heating oil was discovered from the 2,000 and 3,000 gallon USTs on March 17, 2009 during removal activities. (See Limited Site Characterization Report, April 2009, for Camrett Logistics, 100 Ambrose Lane, Rural Retreat, VA, under PC No. 2009-1036.) The former USTs were removed and sent off-site for disposal or recycling as steel scrap. Subsequently, 18.95 tons (15 yd<sup>3</sup>) of contaminated soil were excavated from the area of

the former USTs. According to the April 2009 Report, the contaminated soil was shipped off-site to a licensed disposal facility for treatment and disposal as a non-hazardous waste. Four confirmatory soil samples were collected from the bottom of the USTs excavation at 10 feet below the ground surface. The confirmatory soil samples indicated a limited release from the former USTs; the contaminated soils were removed to meet the VDEQ Tank Program's clean-up criteria and standards for petroleum in soils. No drinking water wells were identified in the proximity of the limited release (within 500 feet) and the area of the Facility is provided with potable water from a public water supply system. Based upon the April 2009 Report and the evaluation and findings of the site and potential receptors, the VDEQ's Petroleum Tank Program has determined that no further investigation of soil media or groundwater media was necessary for protection of human health or the environment. The VDEQ's Petroleum Tank Program issued a closure letter, on June 5, 2009 to Camrett Logistics regarding the release from the USTs.

In summary, all media has been investigated at the Facility; two releases have occurred and were remediated. In 2002, an oil release to the stream in the southern portion of the site was cleaned up. In addition, a release of heating fuel oil discovered during the removal of USTs in 2009 was reported to the VDEQ's Petroleum Tank Program. The release of heating oil to subsoils was limited in nature and confirmatory soil samples indicated that no further investigation or remediation was needed beyond the removal action described above. The VDEQ's Petroleum Tank Program determined that there was no current threat to human health and the environment based upon their evaluation of the findings in the April 2009 Report. The VDEQ's Petroleum Tank Program issued a closure letter on June 5, 2009 for the release from the two USTs.

Based upon the findings of the above administrative record, no further investigation of media is believed necessary under RCRA corrective action.

#### **IV. EVALUATION OF EPA'S PROPOSED DECISION**

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

#### **V. PUBLIC PARTICIPATION**

Interested person are invited to comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date the notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Denis Zielinski at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Denis Zielinski at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed decision at this Facility. To receive a copy of the Administrative Record, contact Mr. Denis Zielinski at the address below:

U.S. EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Mr. Denis Zielinski (3LC20)  
Phone: (215) 814-3431  
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