



Long-Term Stewardship Assessment Report

Exelis Inc. - Night Vision & Imaging (Now Harris Corp.)

EPA ID #: VAD003123072 & VAD980550909

7635 Plantation Road Roanoke, VA 24019

Prepared by: John Hopkins & Mike Jacobi

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Introduction: Long-term stewardship (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 RCRA Corrective Action facilities. The assessment is conducted in two fold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

Site Background: Exelis Night Vision and Imaging (Facility), is an active manufacturing complex engaged in the manufacture of night vision products for government and commercial customers. Operations have been ongoing since 1958. The Facility consists of three major buildings and associated infrastructure located on two parcels of land in Roanoke, Virginia. EPA issued the facility two EPA identification numbers because the parcels are not contiguous. One parcel containing Building #1 and #2 (VAD003123072) of the facility covers about 17 acres. The other parcel, Building #3 (VAD980550909), covers about 5 acres. The Facility is bounded by commercial, industrial, agricultural, and residential properties.

Groundwater contaminants of concern (COCs) are acetone, chloroethane, 1,1-DCA, 1,1-DCE, Cis-1,2-DCE, Trans-1,2-DCE, isopropanol, methylene chloride, PCE, 1,1,1-TCA, TCE, toluene and VC. The soil COCs include acetone, 1,2-DCE (total), isopropanol and TCE. Groundwater plumes have decreased in total VOC concentrations and are not migrating.

Current Site Status: Exelis Inc. is now under Harris Corporation as of May 29th, 2015. On July 10, 2009, EPA issued the Final Decision and Response to Comments (FDRTC) for this Site. In accordance with that decision, Exelis (Harris) has continued to remediate groundwater at both Building #1 and Building #3 locations. Building #3 is not active and may be sold in the near future.

Long-term Stewardship Site Visit: On, June 3rd, 2015 EPA conducted a long-term stewardship site visit with Harris Corporation ITT Night Vision representatives and its contractor to discuss and assess the status of the implemented remedies at the site. The attendees were:

Name	Organization	Email Address	Phone No.
Greg Carter	Exelis Inc. (Harris)	greg.carter@exelisinc.com	540-561-0500
Vince Ruark	Exelis Inc. (Harris)	vruark@ntelos.net	
J. Berry Wallace Jr.	Exelis Inc. (Harris)	jeb.wallace@exelisinc.com	540-561-0371

Mike Jacobi	EPA	jacobi.mike@epa.gov	215-814-3435
Erich Weissbart	EPA	weissbart.erich@epa.gov	410-305-2779
John Hopkins	EPA	hopkins.john@epa.gov	215-814-3437
Kurt Kochan	VADEQ	kurt.kochan@deq.virginia.gov	703-583-3825

Institutional Controls (ICs):

Groundwater: An ordinance by the Allegany Regional Health Department via Roanoke County prohibits the use of groundwater for drinking purposes. Residents/businesses receive their drinking water from a public water supply (Carvin Cove Reservoir). Groundwater is not used for drinking purposes and no new supply wells have been drilled at the Facility. The adjacent Tinker View trailer park, which was where the initial discovery of TCE in a drinking well was discovered, has been closed and no longer contains mobile homes or trailers.

Residential Use: Both parcels are to be used for industrial purposes only. There were no residential areas constructed within Facility boundaries.

Excavation and Soil Management Plan: Any excavation, dredging or earth moving activities must be approved by the Exelis Environmental, Safety & Health (ESH) Director/Manager. . At the time of the Site Visit, there were no excavation, dredging or earth moving activities taking place or that have recently taken place (?) within Facility boundaries.

Informational and Proprietary Controls: There are deed restrictions and a restrictive covenant in place for the Facility.

Engineering Controls (ECs):

Access Controls: There is a security fence surrounding the Facility property at both parcels. The two security fences were intact and undamaged. Security personnel are present around the clock at the active parcel (Building #1 and #2). Building #3 is currently not used and has periodic security checks.

In-situ Enhanced Cometabolic Bioremediation: Anaerobic and aerobic bioremediation injections were previously used to treat VOCs in groundwater in Building #1 and #3 source areas. Exelis Inc. (Harris) plans to continue these injections with a slightly different approach. The Facility will inject into a monitoring well upgradient from the source area, extract from a monitoring well downgradient from the source area, add the appropriate amendments to the extracted groundwater, and re-inject into the first well. This creates a closed loop remedy in order to attack source areas from multiple directions. Exelis will also be using a longer lasting amendment to achieve source reduction.

Soil Vapor Extraction: Vapor extraction was previously used to remove VOCs from soil in Building #1 and #3 source areas. However, VOC removal concentrations decreased and became asymptotic. The SVE system was turned off and is no longer being used.

Financial Assurance: Financial Assurance was not required in the Final Decision and Response to Comments.

Follow-up Activities: Exelis Inc. (Harris) stated that they have plans to develop and implement the Uniform Environmental Covenants Act (UECA) for the restriction of the Building #3 parcel, which is inactive and they anticipate it will be sold in the near future. EPA explained to Exelis representatives that UECA was not available when the remedy was implemented, however it might benefit Exelis if they were to sell. EPA provided examples of UECA's done in Virginia, so Exelis could come up to speed on UECA. ITT Exelis also stated that they are also considering developing and UECA for the Buildings #1 and #2 parcels.

EPA has received and is currently reviewing Exelis Inc. (Harris) 5-year review groundwater monitoring plan. The plan will be implemented once it is approved by EPA.

Conclusion: The engineering controls selected are implemented and remain intact and undamaged. Also, no EC/IC deficiencies have been identified. The current EC/ICs have been implemented and are functional/maintained. EPA intends to update the local community awareness of the elements of the remedy by providing the geospatial mapped property boundary, IC/EC checklist table, post remedy decision and RCRAinfo on our public website and national database.