



UNITED STATES
 ENVIRONMENTAL PROTECTION AGENCY
 REGION III
 STATEMENT OF BASIS
 GE FANUC AUTOMATION
 2500 AUSTIN DRIVE
 CHARLOTTESVILLE, VIRGINIA
 EPA ID NO. VAD980551782

CONCURRENCES							
SYMBOL	3LC30	3LC30					
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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 GE Fanuc Automation facility (also referred to as the Seminole Trail Facility) located at 2500 Austin Drive, Charlottesville, VA 22906 (hereinafter referred to as the Facility). 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 hazardous constituents that have occurred at their property. Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

On November 4, 2004, GE Fanuc Automation agreed to participate in EPA Region 3's Facility Lead Agreement (FLA). The FLA was developed by EPA to address RCRA corrective action facilities and encourage such facilities to take the lead in addressing corrective action using a generic, non-enforceable, agreement which includes the same requirements, and relies on the same scope of work and policy as a permit or an order. Corrective action facilities invited into the program generally meet a number of the following factors: good enforcement record, state approval, financial and technical capability, a proactive approach to clean up, and a willingness to work with the Agency.

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: (1) review of the Facility's environmental history as recorded in EPA and Virginia's Department of Environmental Quality (VADEP) files; (2) EPA and VADEQ recent visits to the Facility to view units closed under VADEQ authority and to view current conditions; and (3) review of the recent groundwater sampling results that were completed as part of the FLA. Taking all of the above into consideration, 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 process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR includes a map of the Facility and the complete set of reports that document Facility conditions that EPA used to evaluate the Facility's status. The AR is available for public review at the EPA Region III 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 GE Fanuc Automation Facility is located at 2500 Austin Drive in Charlottesville, Albemarle County, Virginia. The Facility is on 74 acres in the Piedmont region of Virginia approximately one mile from Pine Mountain (in the Blue Ridge Mountains). The Facility is bordered along the north by State Route 606; on the east side by State Routes 606 and 763; to the south by US Highway 29; and to the west by the Briarwood Housing Subdivision. The region immediately surrounding the site has been classified as light industrial.

The Facility began operations on December 4, 1978 as the General Electric Company and manufactured printed circuit boards which included electroplating. Between 1980 and 1982, the size of the Facility was increased from 40,000 square feet to over 300,000 square feet with the addition of a new wing and construction of the Technical Center. Following the expansion, the manufacturing operations formerly conducted at General Electric's Harris Street location in Charlottesville were gradually moved to the Seminole Trail location in 1982. Also, the Computer Numerical Control manufacturing operation was moved from General Electric's Richmond plant to the Seminole Trail location.

On December 29, 1986, the Facility was renamed GE Fanuc Automation as part of a joint venture between General Electric Company and Fanuc Ltd., a Japanese company. The joint venture was dissolved on December 11, 2009 and the Facility is now operating independently under GE Intelligent Platforms. GE Intelligent Platforms manufactures various industrial

products including programmable controllers, numerical controls, industrial computers, manufacturing software, factory automation systems, printed circuit boards, and data communications networks. The Facility also conducts research and development.

III. Summary of Environmental History

A. Notification

Hazardous wastes generated at the site throughout its operational history have been classified by the Facility with the following EPA Hazardous Waste Codes: D001 (ignitable), D002 (corrosive), D003 (reactive), D006 (cadmium), D008 (lead), D011 (silver), D035 (methyl ethyl ketone), D040, F001 (methylene chloride, 1,1,1-trichloroethane), F002 (methylene chloride, freon), F003, F005, F006 (electroplating waste water treatment sludge), F007, F008, and F009. The wastes codes presented were derived from the Facility's Notification of Hazardous Waste Activity received by EPA on August 18, 1980; Part A permit application, received by EPA on November 19, 1980, and amendments; and Part B permit application, submitted to VADEQ on November 4, 1988, and amendments.

B. Description of Solid Waste Management Units (SWMUs) and Areas of Concern (AOC)

Twenty-four (24) SWMUs and two (2) AOC have been identified at the Facility. A brief description of each SWMU and AOC has been provided below. Based upon a complete review of all information available for the Facility, EPA has determined that all SWMUs and AOC, with the exception of SWMUs No. 7 and 18, have been removed and/or closed and pose no environmental concerns to human health or the environment. With respect to SWMUs No. 7 and 18, potential environmental impacts posed by these units were addressed under an approved Work Plan developed and implemented under the FLA. The investigative findings of the Work Plan are discussed in detail in Section III.C., below.

SWMU No. 1 – Former Industrial Waste Treatment Facility (IWTF)

The Former IWTF was in operation from May 1977 following receipt of a NPDES permit and was used to treat wastewaters and rinse waters generated from printed circuit board electroplating operations. SWMU No. 1 treated electroplating wastewaters and rinse waters through pH adjustment and precipitation and removal of metallic components as hydroxides and sulfides. This unit ceased operation in February 1982 when the new IWTF, identified as SWMU No. 11, began operation.

Documented releases from SWMU No.1 include:

- November 24, 1981, 520 gallons of untreated plating rinse waters were released when the inlet lines to the IWTF were ruptured during construction operations.
- August 12, and August 19, 1983, approximately 1,000 and 800 gallons, respectively, of IWTF influent bypassed the normal treatment process and were discharged into the Herring Branch via the waterway located along the southern edge of the GE property.
- May 14, 1981, during excavation work, the underground feed line to the IWT Batch Process Tank was ruptured and discharged approximately 360 gallons.
- November 30, 1981, a break/leak was observed in the line coming from the Fabrication Building to the IWT Batch Process Tank. The effluent was leaking at a

- rate of 2 gallons/minute for approximately 3 hours.
- December 21, 1981, a break in a potable water line allowed water to flow into the IWT Batch Treatment Tank until it overflowed. Amount of effluent leaked is unknown.

SWMU No. 1 was closed in 2005 in accordance with a November 16, 2004 Closure Plan. Closure of SWMU No. 1 included a field investigation to evaluate the soil and ground water quality surrounding this unit. Analytical results were compared to EPA Region 3 Risk Based Concentrations (USEPA Region III, April 14, 2004) for industrial sites. Several constituents were detected in the soil and ground water, such as arsenic and chromium, at concentrations exceeding the RBC; however, none of these constituents appeared to be related to a release from SWMU No. 1. Furthermore, the constituents found above the RBC were determined to be related to naturally occurring sources or background levels typical of an industrial setting. EPA approved the Tank Closure Completion Report on November 21, 2006.

SWMU No. 2 – Former IWTF Bulk Storage Tank

The Former IWTF Bulk Storage Tank was housed within the walls of the Former IWTF on a concrete floor and was in operation from May 1977 until February 1982. This unit was an approximately 5,200-gallon carbon steel, closed-top, lined cylindrical tank used to accumulate non-treatable plating baths with the hazardous waste codes F007/F008 (cyanides) and D002/D008 (corrosive/lead). The tank was situated up on saddles on the horizontal with a manhole in the top of the tank. This unit was emptied, triple rinsed, and removed when the new IWTF was placed in operation in February 1982. No releases have been reported from this SWMU.

SWMU No. 3 – Former IWTF Drum Storage Area

The Former IWTF Drum Storage Area was a 41-foot by 47-foot gravel area (approx. 6 inches deep) used to store wastewater treatment sludge (F006) generated by the Former IWTF when it ceased operations in 1982. No releases have been reported from this SWMU which was closed.

SWMU No. 4 – Former Solvent Recovery Still #1 (methylene chloride)

The Former Solvent Recovery Still #1 began operation at the Facility in 1982 and was used to recover spent methylene chloride, EPA Hazardous Waste Codes F001/F002, generated by electroplating operations, such as degreasing, stripping and cold cleaning. The unit consisted of a boiling sump with an approximately 100-gallon capacity and utilized steam coils and cooling coils to recover spent methylene chloride. This SWMU was located in the equipment room on a steel reinforced concrete floor with secondary containment. This unit ceased operation in 1992 when the Facility discontinued the use of chlorinated solvents. No releases have been reported from this unit.

SWMU No. 5 – Former Solvent Recovery Still #2 (1,1,1-trichloroethane)

The Former Solvent Recovery Still #2 began operation at the Facility in 1982 and was used to recover spent 1,1,1-trichloroethane (1,1,1-TCA), EPA Hazardous Waste Codes F001/F002, generated by electroplating operations, such as degreasing, stripping and cold cleaning. The unit consisted of a boiling sump with an approximately 100-gallon capacity and utilized steam coils and cooling coils to recover spent 1,1,1-TCA. This

SWMU was located in the equipment room on a steel reinforced concrete floor with secondary containment. This unit ceased operation in 1992 when the Facility discontinued the use of chlorinated solvents. No releases have been reported from this unit.

SWMU No. 6 – Former Equipment Room Spent Etchant Tank

The Former Equipment Room Spent Etchant Tank was placed into operation in 1978 and was used to store waste ammonium hydroxide solution, EPA Hazardous Waste Code D002 (corrosive), generated from stripping copper off printed circuit boards during fabrication. This unit was a 5,644-gallon fiberglass aboveground storage tank located in the manufacturing area on a concrete floor with secondary containment. No releases have been report from this SWMU, which was clean closed in August 1996.

SWMU No. 7 – Former Photo Lab IWTF Interim Storage Tank (former IWTF batch process tank – modified)

The Former Photo Lab IWTF Interim Storage Tank was originally referred to as the IWTF batch process tank. This unit began operation in 1977 as a 60,000-gallon in-ground, open-top, reinforced concrete tank coated with a coal tar/epoxy liner that was used to treat electroplating rinse waters via pH adjustment using lime. When the former IWTF ceased operation in 1982, the IWTF batch process tank was reduced in capacity to 45,000-gallons, lidded, buried and renamed the Photo Lab IWTF Interim Storage Tank. The Former Photo Lab IWTF Interim Storage Tank was used to store rinse waters from the Log E Photo Processor. No releases have been reported from this SWMU, which was clean closed in place in 2005. Closure was achieved by removing residual water from the tank and discharging it to the sanitary sewer and flushing and sealing the underground piping. Excavations were backfilled and covered with asphalt. The tank was filled with a clean mixture of sand, gravel, and fines, then capped with concrete, clean soil and vegetation. USEPA approved the Tank Closure Completion Report on November 21, 2006.

SWMU No. 8 – Former Equipment Room Satellite Accumulation Area

The Former Equipment Room Satellite Accumulation Area began operation in 1982 and covered an approximately 2-foot by 2-foot area of concrete floor in the equipment room in the manufacturing area. This unit consisted of a 55-gallon drum used to store methylene chloride and 1,1,1-TCA still bottom waste, EPA Hazardous Waste Codes F001 and F002, generated from SWMUs No. 4 and 5. No releases have been report from this SWMU, which was closed in the early 1990s.

SWMU No. 9 – Former Plating Solution Sump

The Former Plating Solution Sump was in operation between 1982 and 1988. The unit was constructed of steel-reinforced concrete, had a 500-gallon capacity, and was used to accumulate spent plating bath solution, EPA Hazardous Waste Code D002 (corrosive). In 1988, the Facility began using this SWMU solely as secondary containment for the Former Plating Room Bulk Storage Tank (SWMU No. 10) located in the Former Hazardous Waste Storage Area (SWMU No. 12). No releases have been reported from this SWMU, which was closed in 1997 as part of Former Hazardous Waste Storage Building Container Storage Area (SWMU No. 12) closure.

SWMU No. 10 – Former Plating Room Bulk Storage Tank (Current Aqueous Board Wash Water Storage Tank)

The Former Plating Room Bulk Storage Tank was put in operation in 1982 and closed in 1997 as part of the Former Hazardous Waste Storage Building Container Storage Area (SWMU No. 12) closure. The unit, which is a 6,462-gallon fiberglass aboveground tank, was used to store spent plating bath solutions, EPA Hazardous Waste Code D002 (corrosive). No releases have been report from this SWMU, which is currently used to store aqueous board wash water that is discharged to the Publicly Owned Treatment Works (POTW) under a Virginia Pollution Discharge Elimination System (VPDES) permit.

SWMU No. 11 – Former Industrial Waste Treatment Plant (IWTP)

The Former IWTP operated from 1982 to 1999 and was used to treat industrial wastewater by precipitation and removal of metallic components as hydroxides and sulfides. This unit was housed in a building with a reinforced concrete base, metal walls, concrete curbs at the doors, and a ramp leading to the roll-up door. The concrete base is the only part of SWMU No. 11 that still remains. No releases have been report from this SWMU, which was closed in 2005. Closure was achieved by removing residual water from the tank and discharging it to the sanitary sewer and flushing and sealing the underground piping. Excavations were backfilled and covered with asphalt. The tank was filled with a clean mixture of sand, gravel, and fines, then capped with concrete, clean soil and vegetation. USEPA approved the Tank Closure Completion Report on November 21, 2006.

SWMU No. 12 – Former Hazardous Waste Storage Building Container Storage Area (Current Less Than 90-Day Waste Accumulation Area)

The Former Hazardous Waste Storage Building Container Storage Area began operation in 1982 and consists of a roofed structure with walls and a concrete base that is diked into four segregated storage areas. The following hazardous wastes were stored in this unit: spent fixer and developer (D011/D006); wastewater treatment sludge (F006); spent Freon and filter cartridges from Freon degreaser (F002); etching bath sludge (D002/D008); spent xylene and MEK from silk screening operation (F003/F005); methylene chloride and 1,1,1-TCA still bottoms (F001); waste petroleum naphtha from flushing CAD system (D001); and waste isopropyl alcohol from cleaning equipment (D001). This unit was closed in 1997 at which time it was cleaned three times with aqueous hydrochloric acid and high-pressure steam. No releases have been report from this SWMU, which is currently used as the Facility's less than 90-day hazardous waste accumulation area.

SWMU No. 13 – Former C-Processor Satellite Accumulation Area

The Former C-Processor Satellite Accumulation Area was in operation from 1982 until 1996 and was used to store spent 1,1,1-TCA generated from developing film photoresist. The unit consisted of two 5-gallon containers that were located on a reinforced concrete floor within the manufacturing area. No releases have been reported from this SWMU.

SWMU No. 14 – Former IWTF Hazardous Waste Accumulation Area

The Former IWTF Hazardous Waste Accumulation Area began operation in 1982 and was used to accumulate wastewater treatment sludge, EPA Hazardous Waste Code F006. This unit was located in the filter building and consisted of 55-gallon drums located on a

reinforced concrete floor beneath the filter press. No releases have been reported from this SWMU, which ceased operation between 1995 and 1996.

SWMU No. 15 – Former Photo Lab Hazardous Waste Accumulation Area

The Former Photo Lab Hazardous Waste Accumulation Area began operations in 1982 and was used to accumulate waste solution and spent chemicals, EPA Hazardous Waste Code D006 (cadmium) and D011 (silver), generated by photograph development. This unit consisted of 55-gallon drums located on the reinforced concrete floor (covered with tile) of the photo lab near the developing equipment in the embedded building. No releases have been reported from this SWMU, which ceased operation in the 1990's.

SWMU No. 16 – Former Photo Lab Satellite Accumulation Area

The Former Photo Lab Satellite Accumulation Area began operations in 1982 and was used to accumulate waste solution and spent chemicals, EPA Hazardous Waste Code D006 (cadmium) and D011 (silver), generated by photograph development. This unit consisted of two 5-gallon containers located on the reinforced concrete floor near the photo lab developer equipment (aka Log E Photoprocessor) in the embedded building. No releases have been reported from this SWMU, which ceased operation in the 1990's.

SWMU No. 17 – Former Drilling Room Dust Collector

Operation of the Former Drilling Room Dust Collector began in 1982 and ceased in 1997. This area consisted of a Hoffman Dust Collector used to collect drill and routing dust, EPA Hazardous Waste Code D008 (lead), generated from drilling of plated circuit boards. This unit was housed under a roof and within the walls of the electroplating operations area. No releases have been reported from this SWMU, which was clean closed under the direction of VADEQ in 1997.

SWMU No. 18 – Former Septic Field/Septic Tank(s)

The Facility installed the Former Septic Field/Septic Tank(s) at start up of the plant in 1978 to manage sanitary sewage generated in the fabrication area. Use of this unit ceased in early 1979 when the Facility was connected to the Rivanna Water and Sewer Authority Treatment System. No releases have been reported from this unit.

SWMU No. 19 – Sanitary Sewer Lift Station

The Sanitary Sewer Lift Station was installed in 1982 when the Facility was expanded. This area, located outside the Photo Lab, consists of an underground steel tank housed in a concrete vault with a metal lid on ground level and two pumps. This unit commingles sewage (from SWMU No. 20) and wastewaters generated throughout the Facility which are then pumped off-site to the Rivanna Water and Sewer Authority Treatment System. No releases have been reported from this unit.

SWMU No. 20 – Sanitary Sewage Ejector Station

The Sanitary Sewage Ejector Station was installed in 1982 when the Facility was expanded. This area is located in the South Parking Lot and consists of an air compressor and a steel tank within a concrete and steel pit. Sewage is gravity fed into this unit and then pumped to the other side of the property, where it joins waste from other portions of the Facility at the Sanitary Sewer Lift Station (SWMU No. 19). No releases have been reported from this unit.

SWMU No. 21 – Satellite Accumulation Areas

This unit consists of the following five satellite accumulation areas:

1. Repair and Return (R&R) Waste Paint and Filter Storage Area – Use of this area began in 1991 and is used to accumulate D001 (ignitable) hazardous waste, such as used aerosol cans of paint.
2. Safety Cans – Approximately 30 red flip-top hazardous waste containers are located throughout the manufacturing areas. These containers are used to accumulate hybrid cloths, cotton swabs and associated materials contaminated with isopropyl alcohol (D001) and lead (D008).
3. Solder Dross Pails – These pails contain the residual solder dross from the top of approximately 15 solder pots.
4. Tampo Area – One 55-gallon drum of waste ink and waste solvent (xylene and n-butanol), EPA Hazardous Waste Codes D001 and F003, generated by the printing process.
5. Spent Solder Paste Containers - Two spent solder paste containers (D008) located in the embedding building.

No releases have been reported from this unit.

SWMU No. 22 – Machine Shop

The Machine Shop generates small amounts of waste oil and antifreeze which are stored in SWMU No. 12. No releases have been reported from this unit.

SWMU No. 23 – Tampo Print Area Parts Washer

The Tampo Print Area Parts Washer is solvent-based. No releases have been reported from this unit.

SWMU No. 24 – Trash Compactors

Three Trash Compactors that use hydraulic fluid are utilized at the GE Fanuc site; two are located at the shipping/receiving dock and one is located outside of the kitchen. Each trash compactor is situated on asphalt or concrete. No releases have been reported from these units.

AOC No. 1 – Sanitary Sewer Backup

On May 5, 2007, a backup in the sanitary sewer system occurred, discharging sewage to the front lawn of the GE Fanuc site. The discharge was stopped and the blockage was cleared. A GE contractor removed the top six inches of soil from the area and disposed of it offsite.

AOC No. 2 – Hazardous Waste Storage Building Sump Release

A sump in the Former Hazardous Waste Storage Building (SWMU No. 12) typically accumulated 500 to 1,000-gallons of hazardous waste before it was manually transferred to the bulk storage tank (SWMU No. 10). In September 1986, the level of liquid was found to have exceeded the sump's capacity. In addition, it was determined that the level of liquid in the diked area had dropped for no apparent reason. According to the 1991 RCRA Facility Assessment Report, on October 6, 1986 it was determined that a section of pipe approximately 6 feet deep had developed a crack. The pipe was subsequently replaced, and approximately 20 cubic yards of soil were removed. The excavation was backfilled with a layer of bentonite and soil.

C. Investigative Findings of Work Plan Approved Under FLA

Under the FLA, GE Fanuc Automation contracted Environmental Resources Management, Inc., (ERM) to prepare a Work Plan to collect and analyze groundwater samples to assess the groundwater quality in the vicinity of (1) the Former Photo Lab IWTF Interim Storage Tank (former IWTF batch process tank – modified), which is referred to as Tank #1 and identified as SWMU No. 7; and (2) the former wastewater drain field at SWMU No. 18. The Work Plan was submitted to EPA on November 7, 2009 and subsequently approved on November 9, 2009.

ERM determined the groundwater flow at the Facility to be to the southeast based on topography and surface drainage features of the site. On January 11, 2010, one groundwater monitoring well was installed downgradient of and adjacent to SWMU No. 7 and SWMU No. 18. Soil samples were collected during construction of each of the monitoring wells and screened for total volatile organic compound (VOC) vapors using a photoionization detector (PID). Readings of 5 parts per million (ppm) or less were detected by the PID, and the soil samples showed no visual or olfactory evidence of anthropogenic impact. Therefore, no soil samples were retained for laboratory analysis.

Groundwater sampling of the monitoring wells, identified as MW-1 for SWMU No. 18 and MW-2 for SWMU No. 7, was conducted on January 25, 2010. In accordance with the EPA-approved Work Plan, the groundwater samples were analyzed for Target Compound List (TCL) VOCs, TCL Semi-volatile Organic Compounds (SVOCs), and dissolved (i.e., field filtered) Priority Pollutant List (PPL) metals.

Other than a trace amount of chloroform at an estimated concentration of 2 micrograms per liter ($\mu\text{g/L}$), TCL VOCs were not detected in any of the groundwater samples. Chloroform, which is a common laboratory cross contaminant, is currently not used at the Facility, nor has it been used by the Facility in the past. Furthermore, the chloroform value is listed as a J value, indicating it is an estimated value. Therefore, it was determined that the chloroform detection is not representative of the groundwater quality at the site. TCL SVOCs were not detected in any of the groundwater samples. Trace concentrations of copper, nickel and zinc were detected; however, all of the reported concentrations were well below EPA and VADEQ's screening levels.

Based on the findings of the Work Plan, EPA has concluded that the soil and groundwater quality within the vicinity of SWMU's No. 7 and 18 does not pose any potential for harm to human health or the environment and no further action or controls are needed at the Facility.

IV. Evaluation of EPA's Proposed Decision

EPA's proposed decision that no further action or controls are needed at the GE Fanuc Automation facility is protective of human health and the environment. EPA's proposed decision represents a "Corrective Action Complete without Controls" as described in EPA Guidance found in the Federal Register/ Vol. 68, No. 37/ Tuesday, February 25, 2003/ Notices [FRL – 7454-7] pages 8757 to 8764.

V. Public Participation

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

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Jeanna Henry 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 and is available at the following location:

U.S. EPA Region III
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