



**UNITED STATES**  
**ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**STATEMENT OF BASIS**  
**HUBBELL LIGHTING, INC.**  
**CHRISTIANSBURG, VIRGINIA**  
**EPA ID NO. VAD 058 913 294**

**JULY 14, 2010**

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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 Hubbell Lighting, Inc. facility located at 2000 Electric Way, Christiansburg, Virginia (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>.

### **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 site visit and 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, dated July 21, 2006, Corrective Action Investigation Report, dated December 29, 2009, and the Soil Excavation Report, dated May 2010. 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 process 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, as well as an electronic copy, from the EPA Region III office, the address and telephone number 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 Facility is located at 2000 Electric Way in Christiansburg, Montgomery County, Virginia. The Facility is in a mostly industrial area with some residential properties in the general vicinity. The Hubbell Facility is east of Route 468 and north of Routes 460 and 81 on the east side of Christiansburg. The topography of the site is primarily flat, with the land sloping slightly to the north. Crab Creek is located approximately 400-feet north of the Facility and Wilson Creek is located northeast of the Facility. There are parking areas on the southern and eastern sides of the buildings. To the rear or north of the main buildings are the several smaller buildings including the pole shop and the wastewater treatment plant. The Facility covers approximately 33 acres.

Two large manufacturing building with a combined space of 330,000 square feet make up the majority of the Facility. Several smaller buildings to the north of the main buildings provide housing for the operations of the pole making and the wastewater treatment. The Facility also includes an accredited National Institute of Standards and Technology photometric lab and thermal and wet location testing facilities.

Electric light poles and electric indoor and outdoor lights are manufactured at the Facility. The manufacturing operations performed at the Facility include anodizing, spinning, painting and assembly.

The Facility is considered a small quantity generator of hazardous waste. Manufacturing operations at the Facility use hazardous chemicals, non-hazardous chemicals and petroleum products. Wastes generated from the manufacturing processes are stored in above ground storage tanks, 55-gallon drums, and carboys prior to treatment and/or disposal, as applicable.

The Facility and surrounding area are served by a municipal water supply. There are reported to be two potable water supply wells located within 0.25 miles of the Facility. The Facility is also served by a municipal sewer for plant sewage and treated industrial wastewater.

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

To date, the following RCRA Corrective Action milestones have been completed at this facility:

- December 1, 1991 – Facility was ranked as a “low” priority site according to the National Corrective Action Prioritization System.
- July 21, 2006 – Final RCRA Site Visit Report for the Facility was prepared by ICOR, Ltd. for the EPA and VDEQ.
- September 12, 2006 – Hubbell Lighting, Inc., entered into a Facility Lead Agreement (FLA) with EPA Region III to address the necessary RCRA Corrective Action work at the facility
- May 3, 2007 – Facility submitted a Site Investigation/Corrective Action Work Plan, dated April 24, 2007, to the VDEQ.

- May 6, 2009 – Facility submitted a Final Revision to the Site Investigation/Corrective Action Work Plan, Community Relations Plan, and Health and Safety Plan based on various VDEQ comments.
- May 19, 2009 – The DEQ approved the Facilities Site Investigation/Corrective Action Work Plan, Community Relations Plan, and Health and Safety Plan, all dated May 2009.
- July 18-19, 2009 – Facility conducted the site investigation field activities.
- September 24, 2009 – The two Environmental Indicators are met. Groundwater and Human Health Environmental Indicators were given a “yes” determination by the VDEQ.
- January 7, 2010 – Facility submitted a Corrective Action Investigation Report, dated December 29, 2010 to the VDEQ.
- February 25, 2010 – VDEQ determined that the highest detected concentrations of organic constituents in the soil at the facility did not exceed applicable risk-based concentrations and site-specific soil screening levels. However, the VDEQ did recommend excavating soil in two locations at Solid Waste Management Unit 7 where arsenic and thallium exceeded their statistical limits based on concentrations from background samples collected throughout the site.
- April 10, 2010 – Facility implemented soil excavation program at solid waste management unit (SWMU) 7 to address the arsenic and thallium exceedances.
- May 19, 2010 – Facility submitted a Soil Excavation Report, dated May 2010, to the DEQ. The analytical results indicated that both thallium and arsenic concentrations are well below the background concentrations for the two constituents.

The environmental investigation at the Facility focused on the exceedances observed from organic and inorganic constituents. There were three organic constituents (ethylbenzene, chloroform, and bromodichloromethane) that were exceeding their respective soil screening levels (SSLs) in soil samples collected from SWMUs 6, and 9. Based on site specific calculations performed by the VDEQ, it was concluded that the highest detected concentrations of each individual organic constituents in the soil at SWMU 6 and 9 did not exceed applicable risk-based concentrations and site-specific SSLs. Therefore, no further investigation of the three organic constituents was necessary.

There were two inorganic constituents (thallium and arsenic) that were detected at sampling locations SWMU 7-1 and 7-2. The VDEQ determined that the concentrations observed were exceeding the “99% upper prediction limit” of the background concentrations collected from around the entire site. Thus the VDEQ recommended that the Facility excavate the soils around SWMU 7-1 and SWMU 7-2 that had the detections of thallium and arsenic.

Based on the VDEQ recommendations, a soil excavation program was implemented and executed on April 10, 2010. One of each 4 ft x 4 ft perimeters were installed by cutting through the concrete floor at SWMUs 7-1 and 7-2, respectively, and approximately 30 inches depth of subsurface soil were excavated as recommended by the VDEQ. A subsurface soil sample was collected from a depth between 30 to 36 inches below grade for each of SWMUs 7-1 and 7-2, and analyzed for thallium and arsenic, respectively. The analytical results indicated that both thallium and arsenic concentrations are well below the background concentrations for the two constituents.

In summary, all media were investigated and all solid waste, hazardous waste, and contaminated

media, were removed and/or remediated to meet the RCRA risk-based closure performance standards.

#### 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 persons 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 its proposed remedy for the 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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