



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 3
STATEMENT OF BASIS
FORMER REYNOLDS AVIATION
RICHMOND, VIRGINIA
EPA ID NO. VAD 988 186 599
MARCH 20, 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 Reynolds Aviation Facility formerly located at 5700 Clarkson Road, Richmond, VA 23250 (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 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 March 18, 2008. 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

Reynolds Aviation Division (Reynolds) was a former lessee of the property located at 5700 Clarkson Road in Richmond, VA 23250. Dominion Resources Services Inc. (Dominion) currently operates at the property. The Capitol Region Airport Commission (CRAC) owns an aircraft hanger and property, which Dominion leases to maintain and store jet aircraft. It is not clear when Reynolds began to lease the property, however Dominion's lease started in the fall of 2000. Reynolds Corporation was purchased by Alcoa in 2000.

The aviation hanger is located on an area of land approximately 3 acres in size. The Facility was constructed between 1956 or 1957, and is approximately 20,000 square feet in size.

The closest surface water body is the White Oak Swamp Creek, located approximately ¼ mile east of the Facility.

III. SUMMARY OF ENVIRONMENTAL HISTORY

Dominion is currently registered as a conditionally exempt small quantity generator (CESQG) of hazardous waste due to an on-site parts washer.

Floor drains at the facility collectively discharge with the Facility's sanitary wastewater to the Publically Owned Treatment Works (POTW).

There are two aviation fuel 20,000-gallon Underground Storage Tanks (USTs) at the Facility. These tanks were installed in 1987 and operate in conjunction with a concrete (ground level) fueling station. Two monitoring wells (in addition to tank gauge monitoring systems) provide leak detection for the 20,000-gallon USTs currently in operation at the site. No releases of fuel have been detected or reported from the fueling station to the environment.

A former 8,000-gallon No. 4 heating oil UST was used for the Hanger facility heating system. When less than 75 gallons of hazardous waste was mixed with approximately 2,000-gallons of No. 4 fuel oil, the 8,000 gallon UST became subject to the Virginia

Hazardous Waste Management Regulations (VHWMR) and RCRA Regulations. A February 8, 1995, memorandum from the VDEQ indicated the hazardous waste had been stored in the tank for at least one year without a hazardous waste permit or interim status dedication. Reynolds was issued a Consent Order by the Department of Waste Management (DWM), predecessor to the VDEQ, which required closure of the UST. A Closure Plan/Report was prepared in March 1992. The Closure Plan/Report and “clean closure” of the unit was approved by the VDEQ, Office of Hazardous Waste on September 25, 1995.

Additionally, a 1,000-gallon jet fuel UST was “clean closed” in May 1997 under the oversight of the VDEQ’s Tank Program.

In summary, all media was investigated at the Facility and no hazardous waste releases were documented or observed.

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:

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1650 Arch Street
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Contact: Mr. Denis Zielinski (3LC20)
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