UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

TYCO ELECTRONICS, INC.
751 OLD BRANDY ROAD
CULPEPER, VIRGINIA

Prepared by
Office of Remediation
Land and Chemicals Division
July 2012

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List of Acronyms

AST	Aboveground Storage Tank
COC	Contaminant of Concern
EI	Environmental Indicator
EPA	Environmental Protection Agency
HASP	Health and Safety Plan
MCL	Maximum Contaminant Level
OSHA	Occupational Safety and Health Administration
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis
UST	Underground Storage Tank

Section 1: Introduction

The U.S. Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the Tyco Electronics Inc. facility located at 751 Old Brandy Road, Culpeper Va. 22701 (the Facility). Figure 1 provides a Facility location map. EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

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.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section 5, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

2.1 Facility Description and History

The Rochester Corporation, a subsidiary of Tyco Electronics, manufactures steel wire, fiber optic cable, and umbilical cables that incorporate steel twisted around electromechanical and fiber optic cables.

The Facility was built in 1940 and was a privately held corporation owned by the Rochester family. The Facility has operated under several names including British Tire & Rubber and Tyco International prior to Tyco Electronics.

The Rochester Corporation Facility is approximately 43 acres in size and is located in a commercial and industrial portion of Culpeper County. Facility operations began in 1941 with the production of steel wire rope. Wire rope manufacturing ceased in 1996, however, the Facility continues to manufacture wire, fiber optic cable, and umbilical cables that incorporate steel twisted around electromechanical and fiber optic cables.

2.2 Environmental Setting

Geology

The topographic gradient of the Facility flows from east to west. In general, the natural area of the Rochester Facility is located at an elevation of 400 feet above the mean sea level. Based on the physiographic map of Virginia, 1999, the Town of Culpeper is located in the northern Blue Ridge Province Region of Virginia. In central and northern Virginia, the Blue Ridge Mountains rise to elevations over 4,000 feet. Geology in this area is characterized by steep slopes, narrow ridges, broad mountains, and high relief.

Hydrology and Hydrogeology

The closest notable surface water body to the Facility is Mountain Run. The Facility's Virginia Pollution Discharge Elimination System (VPDES) Stormwater Permit Outfall 001, the discharge point from the pond that is located at the northern (front) portion of the Facility eventually drains to Mountain Run Creek, which is located west of the Facility. Based on observed water levels in a small creek and pond on the Facility, the depth to the water table is believed to be approximately 35 to 50 feet below grade where the Facility buildings are located.

Section 3: Summary of Environmental Investigation

EPA performed a Facility visit on October 29, 2008 and reviewed records at VADEQ on October 28, 2008. The Final Site Visit Report was issued on May 6, 2009.

The Rochester Facility operated a Paten Line that heat-treated steel and applied a molten zinc coating. Wire was passed through a molten lead quenching bath. Coal was used in the lead bath to minimize vapor fumes and splashing. The coal chips from this process were disposed of in an area known as the Former Coal-Lead Hazardous Waste Pile from the 1950s or 1960s until the 1980s when the lead quenching unit was replaced. A Consent Order from VA Department of Waste Management regarding the Waste Pile was signed in 1989, leading to "clean closure" of the unit, in accordance with an approved closure plan. Approval of "clean closure" from VA Department of Waste Management was documented on November 6, 1990.

Historically, wastewaters (rinse waters) were pre-treated at an on-site industrial wastewater treatment plant (WWTP) prior to discharge to the Town of Culpeper's Publicly Owned Treatment Works (POTW) system under a Virginia Pollution Discharge Elimination System (VPDES) Industrial Pretreatment Permit issued by the Town of Culpeper. When operation of the Paten Line Process ceased, industrial wastewaters no longer required monitoring. The Facility maintains a VPDES Industrial Stormwater Permit. The VPDES storm water discharge permit was re-issued with an effective date of July 1, 2009 and an expiration date of June 30, 2014.

Facility records indicate that two 20,000 gallon heating oil USTs were installed in 1975, last used in 1982, and subsequently removed. A 550 gallon kerosene UST was installed in 1953, last used in 1986, and was also removed. Soils surrounding the 550 gallon kerosene tank were removed during tank removal, as evidence of a release was noticed.

Two confirmatory soil samples were collected from a depth of 13.5 feet below ground surface and were determined to be non-detect for TPH. Following sampling of soils, the State Water Control Board (SWCB), predecessor to the Virginia Department of Environmental Quality (VDEQ), concluded the intent of storage tank closure had been satisfied. According to August 24, 1990 SWCB correspondence, the SWCB indicated that little or no likelihood remains that groundwater and surface water may be degraded by kerosene from the tank or surrounding soil.

Pickle liquor, a waste generated on-site from the treatment of metals, was stored in a variety of places including an aboveground storage tank (AST), a concrete vault, rail car, and poly tank. All tanks used for the storage of the spent pickle liquor had been removed from the Facility at the time of the Final Site Visit. Lead concentration in soil samples were below the residential reference values when compared to EPA's Risk Based Concentration (RBC) values from the area surrounding the concrete vault from a sampling event in October 2008.

Additional sampling requested by EPA conducted in May, 2010 in the area surrounding the vault indicated the soil contains lead below industrial RBC values, with two out of 20 twenty samples slightly above the residential RBC value of 400 mg/kg. The samples were taken from the vault pipe chase with values of 434 mg/kg at the surface and 411 mg/kg of lead at 8 feet deep. EPA has determined that the soil in this area do not present an unacceptable risk for the residential exposure scenario and no further action is required.

Approximately 20 to 200 gallons of diesel fuel were released from the tank of a diesel powered generator in December, 1997. The spill occurred onto a concrete pad and gravel-covered ground. Free liquid was removed using absorbent pads. The discharge was contained to the pad surface, underneath the pad, and adjacent soils. Excavation and removal of approximately 24.74 tons of soil in November, 2010 followed by additional soil sampling indicate that no additional removal or remediation is required. A report on the remediation was sent to EPA on December 22, 2010. EPA approved the report on February 14, 2011.

Section 4: Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. EPA has determined that the Facility met Environmental Indicator Migration of Contaminated Groundwater Under Control on August 16, 2011 and met Environmental Indicator Current Human Exposures Under Control on June 4, 2012.

Section 5: Public Participation

Before EPA makes a final decision on its proposed remedy for the Facility, the public may participate in the decision selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The Index to the Administrative Record contains all information considered by EPA in reaching this proposed decision. The AR is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Leonard Hotham
Phone: (215) 814-5778
Fax: (215) 814-3113
Email: hotham.leonard@epa.gov

Interested parties are encouraged to review the AR and 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. You may submit comments by mail, fax, or e-mail to Leonard Hotham. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Leonard Hotham.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed remedy, EPA will modify the proposed remedy or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed remedy will receive a copy of the FDRTC. Others may obtain a copy by contacting Leonard Hotham at the address listed above.

Date: 7/16/12

Abraham Ferdas, Director
Land and Chemicals Division
US EPA, Region III

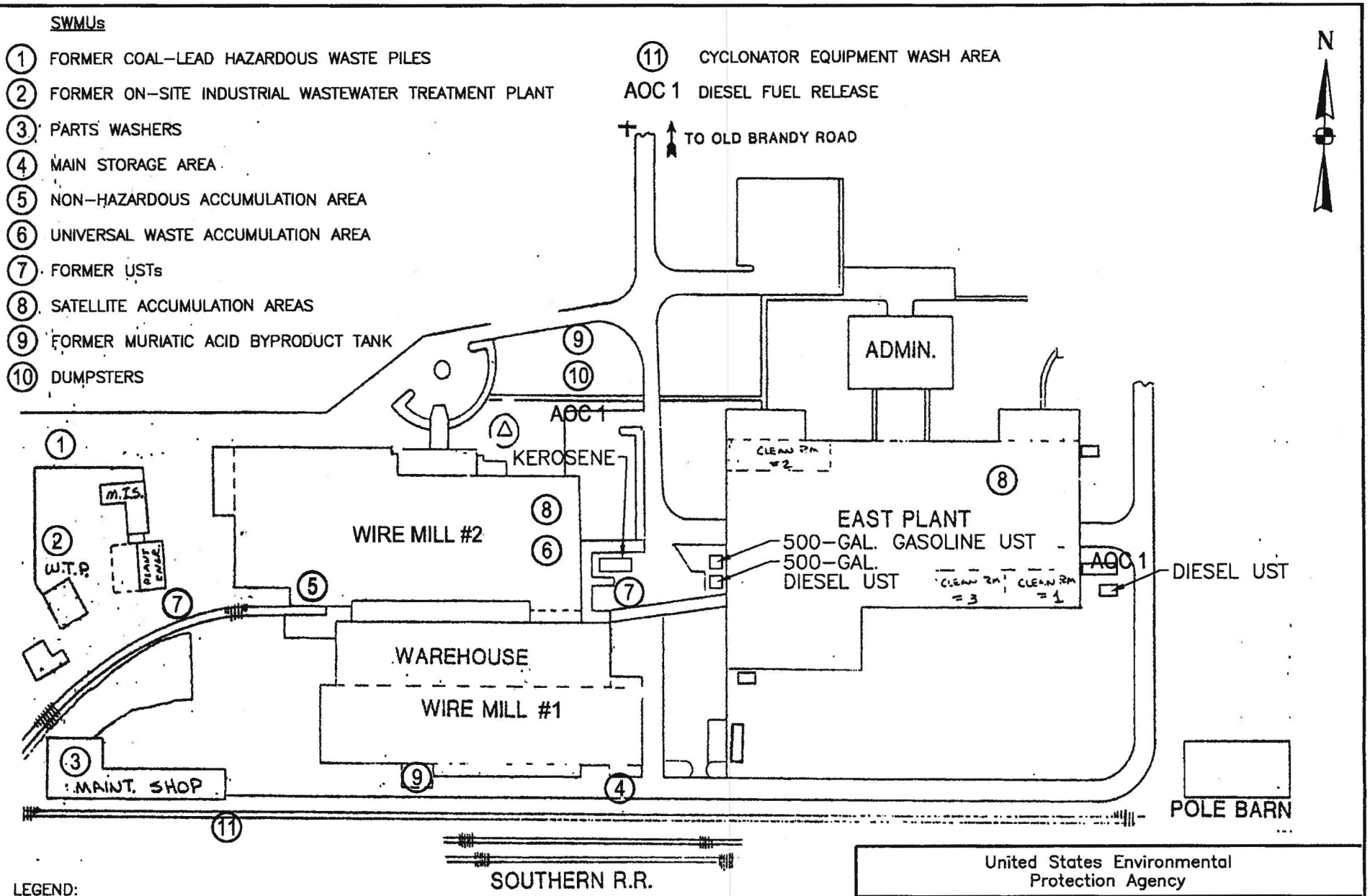
Index to Administrative Record

Final RCRA Site Visit Report, Tyco Electronics Culpeper, VA 22701 prepared by Tetra Tech Consultants, May 6, 2009

Focused Site Investigation Report, Tyco Electronics, Culpeper, VA 22701 by ERM Consultants June 28, 2010

Final Soil Removal Work Plan, Tyco Electronics, Culpeper, VA 22701 by ERM Consultants September 30 2010

Letter Re: Results of Soil removal and Additional Sampling, AOC 1 from ERM Consultants to Tyco Electronics Culpeper, VA 22701 December 21, 2010


SWMUs
1 FORMER COAL–LEAD HAZARDOUS WASTE PILES
2 FORMER ON–SITE INDUSTRIAL WASTEWATER TREATMENT PLANT
3 PARTS WASHERS
4 MAIN STORAGE AREA
5 NON–HAZARDOUS ACCUMULATION AREA
6 UNIVERSAL WASTE ACCUMULATION AREA
7 FORMER USTs
8 SATELLITE ACCUMULATION AREAS
9 FORMER MURIATIC ACID BYPRODUCT TANK
10 DUMPSTERS
11 CYCLONATOR EQUIPMENT WASH AREA
AOC 1 DIESEL FUEL RELEASE
N
TO OLD BRANDY ROAD
ADMIN.
AOC 1
KEROSENE
WIRE MILL #2
EAST PLANT
500–GAL. GASOLINE UST
500–GAL. DIESEL UST
AOC 1
DIESEL UST
WAREHOUSE
WIRE MILL #1
MAINT. SHOP
POLE BARN
SOUTHERN R.R.
W.T.P.
M.I.S.
LEGEND:
1 SOLID WASTE MANAGEMENT UNIT LOCATION (SWMU)
AOC AREA OF ENVIRONMENTAL CONCERN
NOT TO SCALE
SOURCE:
THE ROCHESTER CORPORATION, CULPEPER, VIRGINIA 22701.
United States Environmental Protection Agency
THE ROCHESTER CORPORATION
Culpeper, Virginia
FIGURE 3
SWMU AND AOC MAP
TETRA TECH EC, INC.