



VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

FINAL DECISION AND RESPONSE TO COMMENTS

MW Manufacturers, Inc.
Rocky Mount, Virginia

EPA ID NO. VAD058205170

May 2021

Final Decision

The Virginia Department of Environmental Quality (DEQ) is issuing this Final Decision and Response to Comments (Final Decision) under the authority of 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 and 6992k, regarding the remedy for the MW Manufacturers, Inc. Facility (Facility) located at 433 North Main Street in Rocky Mount, Virginia.

On April 14, 2021, DEQ issued a Statement of Basis (SB) in which it described its proposed remedy for the Facility. The SB is hereby incorporated in this Final Decision by reference and is included in the enclosed.

Public Comment Period

On April 14, 2021, a public notice for the SB was published in the Franklin News-Post newspaper and announced a thirty (30)-day public comment period which requested comments from the public on the remedy proposed in the SB. A copy of the public notice and the SB was also placed on DEQ's webpage. The public comment period ended on May 14, 2021.

Response to Comments

DEQ received no comments on its proposed remedy for the Facility. Consequently, DEQ's determination did not change from the final remedy proposed in the SB.

Final Remedy

The Final Remedy consists of the following components: 1) continue to monitor groundwater in accordance with a DEQ-approved groundwater monitoring plan until corrective action objectives have been met; and 2) maintain compliance with land use restrictions and institutional controls that will be imposed by an environmental covenant.

MW Manufacturers, Inc. FDRTC
May 2021

Declaration

Based on the Administrative Record compiled for Corrective Action at the MW Manufacturers, Inc. Facility, DEQ has determined that the Final Remedy selected in this Final Decision and Response to Comments is protective of human health and the environment.



5/19/2021

Chris Evans, Director
Office of Remediation Programs
Virginia Department of Environmental Quality

Date

Enclosure: Statement of Basis, April 14, 2021

STATEMENT OF BASIS



VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

STATEMENT OF BASIS

MW Manufacturers, Inc.
Rocky Mount, Virginia

EPA ID NO. VAD058205170

April 2021

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1.0 INTRODUCTION

The Virginia Department of Environmental Quality (DEQ) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the MW Manufacturers, Inc., facility located at 433 North Main Street, Rocky Mount, Virginia (the Facility). DEQ's proposed decision generally consists of the following components: 1) groundwater monitoring in accordance with an Agency-approved groundwater monitoring plan and 2) implement and maintain compliance with land use controls in the form of an environmental covenant prepared in accordance with the Uniform Environmental Covenants Act, Title 10.1, Chapter 12.2, Sections 10.1-1238-10.1-1250 of the Code of Virginia. This SB highlights key information relied upon by DEQ in making its proposed decision.

The Facility is subject to the United States Environmental Protection Agency's (EPA) 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. § 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and remediated 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 DEQ's proposed decision is based. See Section 9, Public Participation, for information on how you may review the AR.

2.0 FACILITY BACKGROUND

The Site is located at 433 North Main Street, within the Town of Rocky Mount, Franklin County, Virginia. The Facility is located on an approximately 38.7-acre property occupied by a 578,000-square-foot building that houses MW's manufacturing, warehouse, and office operations. Smaller security guard house and office/personnel training buildings are located along the eastern edge of the property. A 10,000-square-foot truck maintenance building is located along the western property boundary. The Facility has been an industrial-use site since the early 1900s and has been manufacturing windows since at least 1943.

The former MW manufacturing building was located in the northeastern portion of the Site, most of which was destroyed in a November 1978 fire. The facility was reconstructed after extensive site preparation and grading of soils that underlay the former plant, including placement of up to 35 feet of fill in some areas.

The current building is located on ground that slopes to the southwest and is bounded on the north by Smithers Street, to the east by Franklin Street and Main Street, to the south by Norfolk Southern railroad tracks, and to the west by wooded area and Peters Avenue.

Current operations include woodworking, treating wood surfaces, glass cutting/cleaning, fabricating vinyl, and assembling windows, screens, and doors. Wood was historically treated in one of three former dip-tanks (former Dip-Tank-1, -2, and -3). Wood preservative solutions at the Site previously consisted of pentachlorophenol (PCP) in a mineral spirits carrier until 1985. PCP was discontinued in 1986; thereafter, the Facility treated wood using a mineral spirit-based solution containing 3-iodo-2-propynyl butyl carbamate (IPBC) in addition to a water-based wood preservative. The water-based solution was discontinued in the late 1990s. Wood is currently treated in a closed-loop vacuum pressure system in an aboveground lineal tank using the mineral spirit-based solution containing IPBC.

The majority of the Site is either paved or covered by buildings and other structures. A stream runs through the southern portion of the property parallel to the railroad tracks. Remaining unpaved areas are generally covered with arid, low-lying vegetation, grass, or trees in either landscaped or natural areas.

The Site and property to the east and southeast are zoned for commercial/industrial uses and the remaining surrounding areas are generally classified as single-family urban use.

The principal potable water supply for the Town of Rocky Mount is the Black Water River, and the potable water system is maintained and operated by the Rocky Mount Water Department. One municipal public water supply well was previously identified approximately 1/3 mile south of the Facility in the Environmental Data Resources Inc. Radius Map reviewed during the Phase 1 RCRA Facility Investigation (RFI) activities. As part of the Phase 2 RFI activities, a well survey was conducted for properties within a 0.5-mile radius of the Facility to determine the existence and locations of any potable and non-potable wells, but no wells were identified.

3.0 SUMMARY OF ENVIRONMENTAL HISTORY

3.1 Release Summary and RCRA Closures

In 1985, a release of the wood preservative PCP solution occurred on the southwest bank of the facility, which was later determined to originate from a damaged joint in the piping for the 10,000 gallon underground storage tank (UST). The 10,000 gallon UST containing wood preservative was removed from the southwest corner of the property and impacted soils were removed around the leaking pipe and the damaged joint was repaired under the supervision of DEQ personnel. The use of PCP wood preservative was discontinued in 1986 and a mineral spirit-based wood preservative solution containing IPBC was used thereafter in its place.

In 1994, a 3,000 gallon UST was discovered containing approximately 2,700 gallons of liquid waste. This tank was identified as part of a former emergency system that enabled product from a wood dip tank within the facility to be transferred to the UST in the event of a fire. The use of this system and UST was discontinued in 1984. Analysis verified that the waste within the UST contained PCP.

On June 1, 1999, MW Manufacturers agreed to a Consent Order issued by the DEQ associated with management and closure of the 3,000 gallon UST discovered in 1994. On September 25, 2002, DEQ approved "clean closure" certification in accordance with the Closure Plan.

In 1997, the use of a 4,000 gallon UST was discontinued. The UST occasionally stored a water-based wood preservative solution with IPBC during maintenance activities for its associated dip tank (Dip Tank 2). In December 1998, MW Manufacturers closed the UST (reportedly along with the associated dip tank) in place and conducted an impact assessment of the surrounding soils. The assessment indicated soil contamination that included the presence of PCP, which the UST reportedly did not contain during its use. A separate source of contamination was suspected due to the presence of PCP in soil. The DEQ approved the closure report on January 19, 2000.

Between November 2004 and April 2005 there was one diesel pollution complaint release investigated and closed with no further action by the DEQ Petroleum program.

In May 2007, the facility decommissioned a 2,700 gallon dip tank (Dip Tank 3) that had contained mineral spirit-based wood preservative solution with PCP. The facility had discontinued use of the dip tank in 1994. The dip tank was a pit constructed of concrete with a 0.25-inch steel liner. The facility performed basic investigations following decommissioning activities. These investigations indicated soil and perched water contained detected concentrations of mineral spirits and PCP.

3.2 RCRA Facility Investigation

As documented in the March 2008 Final RCRA Site Visit Report, fifteen Solid Waste Management Units (SWMUs) and one Area of Concern (AOC) were identified. On September 12, 2011, MW Manufacturers entered into a 3008(h) Facility Administrative Order on Consent, docket No. RCRA-03-2011-0182CA (Order) with the U.S. Environmental Protection Agency (EPA) which required the Facility to perform site-wide corrective action.

During the preparation of the Description of Current Conditions prepared in 2011, three additional AOCs were added to the list of "SWMUs and AOCs" identified during the RFA. Based on available information, site records, and previous investigations, the following five SWMUs and three AOCs (as well as an unnamed stream, located at the southwestern property boundary) were further evaluated during the Phase 1 RFI which was completed in 2013:

Table 1: SWMU and AOC Identification Table

Identification	Description
SWMU-1	Former 3,000 Gallon (gal) Underground Storage Tank (UST)
SWMU-2	Former 10,000 gal UST
SWMU-7	Former Dip-Tank 3
SWMU-14	Former 4,000 gal UST and associated Former Dip Tank-2
SWMU-15	12,000 gal Diesel Fuel UST
AOC-2	Former Dip Tank 1
AOC-3	Former Gasoline Pump and associated UST
AOC-4	Former Diesel Pump and associated UST
Unnamed Stream	Along Southern Facility Boundary

The Phase 1 RFI Report was submitted in December 2015. The Phase 2 RFI and the Human Health Risk Assessment and Baseline Ecological Risk Assessment were submitted in October 2018. The results of these investigations are summarized below.

3.1.1 Soil

Constituents were detected in soil at concentrations greater than Industrial direct-contact RSLs which were determined to be the applicable screening levels for the Facility's current and proposed future use. The constituents reported at concentrations in excess of industrial RSL values include naphthalene, PCP, arsenic, copper, iron, manganese, and dioxin/furan. With the exception of arsenic and dioxin/furan, the soil exceedances are limited to AOC-2 (former Dip-Tank-1). All of the arsenic concentrations at the site are below background concentrations. In addition, analytical data for tentatively identified compounds (TICs) suggests that nonane may also be present in AOC-2 soil at a concentration greater than the industrial RSL.

Although contaminants are present in subsurface soil in concentrations that exceed residential and industrial risk-based RSLs for direct contact, the soil pathway is not applicable to residents, workers, day-care, trespassers, or recreational users given (1) the current industrial use of the site, (2) the contaminants of concern (COCs) being observed in areas surfaced with asphalt and/or concrete restricting access and/or exposure, or (3) COCs are present at depths greater than 10 feet below grade. However, in the event subsurface utility repairs or capital improvement projects in the future are needed, a Materials Management Plan has been prepared for the Facility to prevent exposure and will be a required component of the remedy.

3.1.2 Groundwater

The following table shows constituents detected in groundwater above the National Primary Drinking Water Maximum Contaminant Levels (MCLs) published by EPA or the EPA Regional Screening Levels (RSLs) for Tapwater (where no MCL is available).

Table 2. Contaminants of Concern in Groundwater

Contaminant of Concern (COC)	MCL (ug/L)	Tap Water RSL (ug/L)
1,2,3-trimethylbenzene	NA	5.5
1,2,4-trimethylbenzene	NA	5.6
1,3,5-trimethylbenzene	NA	6.0
Acrolein	NA	0.0042
Pentachlorophenol	1.0	0.041
2,3,4,6-tetrachlorophenol	NA	24.0
Naphthalene	NA	0.17
Safrole	NA	0.096
1,2,3-trichloropropene	NA	0.062
Hexavalent Chromium	NA	0.035
Iron	NA	1,400
Manganese	NA	43
2,3,7,8-TCDD Toxicity Equivalent Factor (TEQ)	0.00003	0.00000012

Free-phase light non-aqueous phase liquid (LNAPL) was observed in several existing wells and does not appear to be continuous or particularly mobile below the southwestern corner of the Facility. The LNAPL appears to be sequestered in the fill material underlying the southwestern corner of the Facility. Two of the wells (CONF-12 and CONF-13) where free-phase LNAPL was observed are situated in proximity to SWMU-7 (former Dip-Tank 3); the third well (CONF-7) is situated in the central part of the southwestern corner of the main building to the west of SWMU-14 (former Dip-Tank-2).

There are two distinct groundwater plumes observed on site. The depth to groundwater varies across the Site, generally ranging from 5 to 25 feet below ground surface (bgs). The eastern plume is primarily observed in the saprolite and has migrated from the source area (AOC 2: former Dip Tank-1) shown in the attached Figure 1 in Exposure Area 1 to the west/southwest similar to the regional groundwater flow direction. The western plume originating from areas of SWMU-7 (former Dip Tank-3) and SWMU-14 (former Dip Tank-2) has resulted in discontinuous lenses of LNAPL, contaminated soils, and a dissolved groundwater plume in fill and alluvial materials (Exposure Area 2). The fill is relatively thick and variable which has resulted in variability of flow in the western portion of the site.

The shallow contaminated groundwater plume has been delineated under the building. It appears that the majority of the contaminant mass in groundwater is not highly mobile due to an area of apparent stagnant groundwater flow in the vicinity of the source area. There is observable upward groundwater flow from bedrock up to the Fill/Alluvium unit in the western plume area. Very little evidence of site related impacts is observed in the bedrock screened wells (MW-1, MW-3, and MW-4). Based on the chemical concentrations, migration from the Fill/Alluvium units to the bedrock units is not a primary pathway for fate and transport of the constituents.

Concentration of constituents of concern generally decreased in most wells from the 2013 Phase 1 RFI sampling event to the October/November 2017 and June 2018 Phase 2 RFI sampling events. In addition,

the number of and concentration of detected compounds in the wells screened in the alluvium were generally higher than the wells screened in the deeper bedrock.

Although contaminants are present in groundwater at concentrations that exceed MCLs and/or risk-based RSLs for tap water, the groundwater pathway is not applicable to day-care, trespassers, or recreational users due to the current industrial use of the site. In addition, groundwater is not used onsite or offsite for potable use.

3.1.3 Indoor Air

Vapor intrusion is a potential exposure pathway in portions of the Facility building (Exposure Area 2). However, an assessment submitted in June 2017 along with an industrial hygiene assessment demonstrated that the vapor intrusion pathway is not significant for current use conditions. The report indicated that volatile organic compounds (VOCs) in groundwater beneath the building are not detected at concentration greater than vapor intrusion screening levels and/or VOCs in soil and groundwater beneath the building are in use at the facility, therefore employee health and safety regarding potential exposures to those COCs is protected by Occupational Safety and Health Administration (OSHA) regulations.

3.1.3 Surface Water and Sediment

Directly south of the Facility is a culvert leading to the unnamed stream; the stream eventually contributes to Furnace Creek approximately 0.5 miles west of the Facility. Surface water from the Facility and a sizable portion of the surrounding properties (including various industrial sites and adjacent rail line to the south) discharge into this culvert. The stream is perennial but widely varies in flow rate and volume during storm events. Based on the detection of site related contaminants in surface water and sediment, the groundwater from the shallow alluvium appears to be discharging near the toe of the fill slope and flows to the stream. In addition, the hydraulic heads in the bedrock screened wells located along the southwestern side of the Facility suggest that the groundwater in the shallow bedrock discharges upward into the stream.

Seasonally, the surface water from the onsite stream recharges the groundwater in the Fill/Alluvium hydro-stratigraphic unit. This results when surface water elevations in the stream nearer the building are comparably higher than the groundwater elevation. However, groundwater discharge to the stream also occurs when the stream elevation is lower and further down the stream where the base elevation is lower.

Potential contact with surface water would most likely be from the trespasser receptor. PCP, dioxin/furans, bis-2-ethylhexylphthalate (BEHP), iron and manganese were detected above the lower of the Federal Water Quality Criteria (WQC) for Consumption of Water + Organism and Virginia Public Health Water Quality Standard for Public Water Supply listed in 9 VAC 25-260. The plant workers and construction workers will not be exposed to the surface water or sediment sample locations as they are not readily accessible from the north and require crossing an active rail line from the south.

A Materials Management Plan has been prepared and approved by DEQ that addresses potential exposure during construction activities in this area. Although access from trespassers is possible, it is unlikely that trespassers or recreational users would access the property. "No Trespassing" signs were installed to mitigate the potential for exposure.

During ecological screening, the following constituents were detected in surface water above the EPA Region III Biological Technical Assistance Group (BTAG) screening levels published July 2006: PCP and 2,3,7,8-TCDD (TEQ).

Potential contact with sediment in the intermittent stream would be transient in nature; the greatest likelihood of exposure would be associated with trespassing activities. Contaminants detected in sediment

in the onsite intermittent stream exceed the industrial screening level for dioxin/furans. However, site-specific risk assessment shows site-specific exposure scenarios are below risk threshold criteria. The Facility has provided demonstration that signage and fencing is adequate to protect against trespasser exposure.

Access to the stream is difficult due to steep terrain, thick vegetation, and the need to cross an active railroad line, which is elevated above the floodplain if approaching the stream from the south. Surface water and sediment in the unnamed stream do not exceed unacceptable risks for future land use conditions which assumes that trespassing could potentially occur in the stream. This conclusion considers that trespassing populations would likely include older children and adults, given the physical location and associated difficulty in accessing the stream. If, under a future land use condition, access to the stream was made available such that a young child (ages 1 to 6) could trespass in the stream, the hazard index associated with sediment is estimated to be above a value of 1. However, this scenario is unlikely.

Risks to benthic invertebrates were evaluated by comparing analytical data for surface water and sediment to surface water and sediment quality values; polycyclic aromatic hydrocarbons (PAHs) were assessed using equilibrium sediment benchmarks. The results of the Baseline Ecological Risk Assessment (BERA) indicate that constituents in surface water and sediment do not pose unacceptable risks to the benthic community because exposure point concentrations do not exceed benchmark values and the results of the rapid bioassessment suggest that the greatest impact to the benthic community is associated with physical stressors (e.g., storm water flow). Although fish are not present in this reach of the stream, these conclusions can be extended to fish.

The results of the BERA indicate that constituents in surface water and sediment do not pose unacceptable risks to mammals and birds, as evidenced by hazard quotients that do not exceed a value of 1.

3.3 Human Health Risk Assessment Summary

The Human Health Risk Assessment was submitted with the Phase 2 RFI Report in October 2018. The results of the risk assessment indicated based on current use and compliance with the existing site access controls and Materials Management Plan, there are no complete human exposure pathways to Site-related COCs in soil, groundwater, vapor, surface, water, and sediment.

Under future use, the existing building may be used for other commercial purposes (industry that may not use the COCs presently used at the Facility); existing pavement/or buildings may be removed, thereby exposing surface soil; subsurface soil, and trespassing at the unnamed stream could potentially occur.

Under these assumptions, the following exposure pathways were evaluated for potential risks:

- Direct contact with soil for commercial/industrial use;
- Incidental exposure to groundwater during redevelopment construction activities;
- Vapor intrusion from groundwater; and
- Direct contact with surface water and sediment in the stream.

The Human Health Risk Assessment (HHRA) grouped the data into four Exposure Areas (EAs) designated based on similar exposures that could be encountered for each area. The Exposure Areas are shown in the attached Figure 1.

- EA-1: AOC-2 (surface soil, subsurface soil, groundwater);
- EA-2: Area beneath the building (subsurface soil and groundwater);
- EA-3: Area outside of the building (surface soil, subsurface soil, groundwater); and
- EA-4: Stream (surface water and sediment).

Overall, the results of the HHRA indicate the following:

There is no current risk to potentially exposed populations based on current industrial land use, current Facility operations, and existing engineering controls (e.g., asphalt, concrete slab, fencing, No Trespassing signs) in place at the Site. A potential future long-term exposure risk in excess of the DEQ RCRA risk thresholds could occur for a commercial/industrial worker, and a potential future short-term exposure risk in excess of the DEQ RCRA risk thresholds could occur to a construction worker if soil containing COCs was excavated and made accessible in EA-1. Such risks would only be applicable to a future land use condition in which soil from zero to depths greater than 15 feet bgs at the Site was made accessible. This scenario is unlikely.

A potential future short-term exposure risk in excess of the DEQ RCRA risk thresholds could occur for a construction worker exposed to shallow groundwater in EA-1 (in the vicinity of monitoring well MW-2). Such risks would only be applicable to a future land use condition when construction workers were excavating into soil and shallow groundwater and contacted these media daily. This scenario is unlikely.

A potential future long-term exposure risk could occur for a commercial/industrial worker potentially exposed to vapors that may hypothetically migrate from groundwater to indoor air in EA-2. Such risks would only be applicable to a future land use condition in which the current manufacturing process and/or the building use was to change and the indoor air quality for workers was no longer addressed under OSHA.

4.0 CORRECTIVE ACTION OBJECTIVES

There are no current risks to potentially exposed populations or ecological receptors based on current industrial land use, current Facility operations, and existing engineering controls.

4.1 Soil

DEQ has determined that industrial risk based screening levels are protective of human health and the environment for individual contaminants at this Facility provided the Facility is not used for residential purposes. Therefore, DEQ's Corrective Action Objective for Facility soils is to control exposure to hazardous constituents remaining in place by requiring compliance with and maintenance of land use restrictions. The controls will limit the Facility to non-residential uses and require compliance with a Materials Management Plan approved by DEQ. The requirement for land use restrictions will be imposed by a future Uniform Environmental Covenants Act (UECA) covenant.

4.2 Groundwater

DEQ has determined that that the Corrective Action Objectives for Facility groundwater are:

- 1) Prevent direct exposure to COCs in shallow groundwater (less than 15 feet below ground surface) in EA-1 (AOC-2 – Former Dip-Tank 1) until such time as drinking water is restored;
- 1) Monitor groundwater until such time as it can be shown that the concentrations of hazardous constituents have met remedial goals set forth in Table 2 (or other Agency approved risk-based goals) or until such a time as it can be demonstrated to the satisfaction of the Agency that the concentrations of hazardous constituents exhibit a generally stable or decreasing trend.

4.3 Indoor Air

The vapor intrusion (VI) pathway is not considered a concern for potential current exposures because the chemicals present in groundwater that exceed the industrial screening level for potential vapor intrusion

are components of chemicals currently in use at the Facility and thus subject to OSHA standards. However, in the event there is a change in chemical inventory at the facility, whereas COCs detected in soil and groundwater are no longer in use, DEQ's Corrective Action Objective for indoor air is to control exposure to volatile hazardous constituents in indoor air by requiring the use of vapor mitigation in or beneath existing and any newly constructed totally enclosed structures designed for occupation within 100 feet of the foot print of groundwater having site-related VOCs and semi-volatile organic compounds (SVOCs) identified above protective levels (vapor intrusion screening levels, or VISLs), unless it is demonstrated to DEQ that vapor mitigation is not necessary to protect human health. This requirement will be included in the forthcoming Operations and Maintenance plan which will be imposed by the future UECA covenant.

5.0 SUMMARY OF PROPOSED REMEDY

Under this proposed remedy, DEQ is requiring the following actions:

- 1) The Facility shall monitor groundwater pursuant to an Agency-approved groundwater monitoring plan, and any revisions thereto, until such time as it can be shown that the concentrations of hazardous constituents have met remedial goals set forth in Table 2 (or other agency approved risk-based goals) or until such a time it can be demonstrated to the satisfaction of the Agency that the concentrations of hazardous constituents demonstrate a generally stable or decreasing trend.
- 2) Maintain compliance with land use restrictions and institutional controls that will be imposed by a UECA Compliant Covenant and include the following:
 - a) The Property shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools, or playground purposes and senior care facilities;
 - b) Groundwater beneath the Property shall not be used for any purposes except for environmental monitoring and testing, or for non-contact industrial use as may be approved by the Agency. Any new groundwater wells installed at the Property must be approved by the Agency;
 - c) Excavation and/or management of soil and groundwater in Exposure Area 1 shall be conducted in accordance with an Agency-approved Materials Management Plan.
 - d) Maintain the following engineering controls in accordance with an Agency approved Operations and Maintenance Plan.
 - i) Maintain Site security fencing and No Trespassing signage
 - ii) Maintain building pad and asphalt cover in Exposure Areas 1 and 2
 - iii) Design and Maintain Compliance with a Contingency Plan for Vapor Mitigation in the event of product inventory change

Compliance with and effectiveness of the proposed remedies and engineering and institutional controls at the Facility shall be evaluated and included in groundwater monitoring and corrective measures implementation reports. The Facility shall report to the Department whether the engineering and institutional controls are being observed in accordance with requirements that will be included in the forthcoming UECA.

6.0 EVALUATION OF DEQ'S PROPOSED DECISION

This section provides a description of the criteria DEQ used to evaluate the proposed remedy consistent with EPA guidance. DEQ evaluated three remedy threshold criteria as general goals.

- Protect Human Health and the Environment
- Achieve Media Cleanup Objectives

- Remediating the Source of Releases

Land use controls and risk management, LNAPL recovery, and In-situ treatment remedial alternatives were evaluated in the Corrective Measures Study (CMS).

The three alternatives were evaluated and compared using the seven balancing criteria:

- Long term effectiveness
- Reduction of Toxicity, Mobility, or Volume of the Hazardous Constituents
- Short-Term Effectiveness
- Implementability
- Cost
- Community Acceptance
- Federal Agency Acceptance

There is no current risk to potentially exposed populations or ecological receptors, and there is only a future potential risk if the site's land use or operating conditions change. Considering existing conditions, potential short term risk and disturbance to operations with no long term benefit associated with active remedial alternatives; DEQ concurs that land use controls and risk management is the preferred remedy.

7.0 IMPLEMENTATION

DEQ proposes to implement the remedy through pursuance of an environmental covenant under the Virginia Uniform Environmental Covenants Act, Title 10.1, Chapter 12.2, Sections 10.1-1238-10.1-1250 of the Code of Virginia.

8.0 ENVIRONMENTAL INDICATORS

Under the Government Performance and Results Act, EPA set national objectives 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. The Facility met these indicators on February 12, 2019.

9.0 PUBLIC PARTICIPATION

Before DEQ makes a final decision on its proposed remedy for the Facility, the public may participate in the decision process by reviewing this SB and documents contained in the Administrative Record for the Facility. The Administrative Record contains all information considered by DEQ in reaching this proposed decision. Interested parties are encouraged to review the Administrative Record and comment on DEQ'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. Ryan Kelly at the address listed below.

Virginia Department of Environmental Quality
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P.O. Box 1105
Richmond, VA 23219
Contact: Ryan Kelly
Phone: (804) 698-4045
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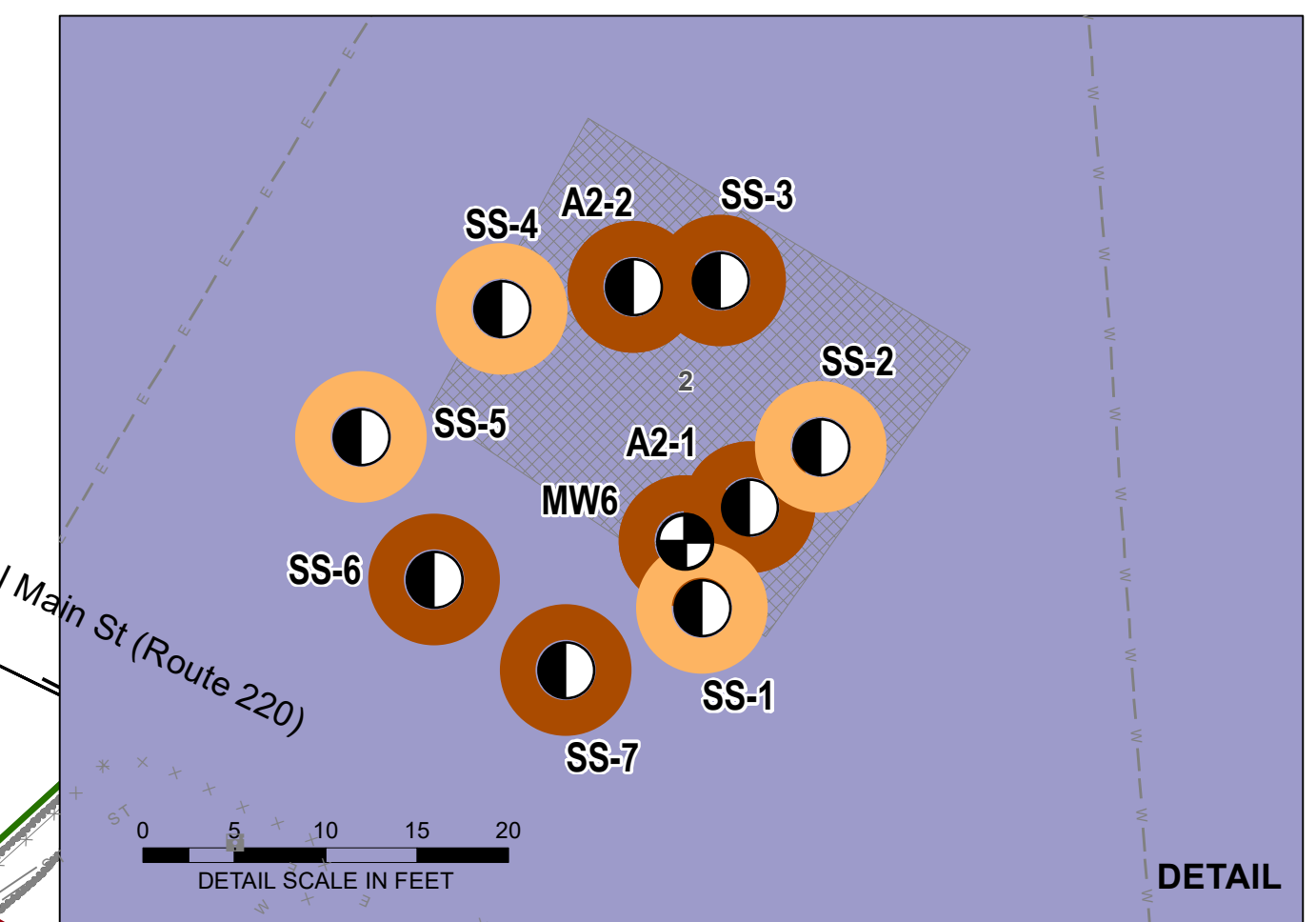
DEQ will make a final decision after considering all comments, consistent with the applicable RCRA requirements and regulations. If the decision is substantially unchanged from the one in this Statement of Basis, DEQ will issue a final decision and inform all persons who submitted written comments or requested notice of DEQ's final determination. If the final decision is significantly different from the one proposed, DEQ will issue a public notice explaining the new decision and will reopen the comment period.

Figure 1

- NOTES**
1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
 2. SOIL RESULTS ARE FROM MARCH 2013 AND OCTOBER/NOVEMBER 2017.
 3. GROUNDWATER, SURFACE WATER, AND SEDIMENT RESULTS ARE FROM OCTOBER/NOVEMBER 2017.
 4. WELLS CONF-7, CONF-12, AND CONF-13 HAD FREE PRODUCT.

- SWMU**
- 1 FORMER 3,000-GALLON UST
 - 2 FORMER 10,000-GALLON UST
 - 3 FORKLIFT MAINTENANCE AREA/INSULATED GLASS MAINTENANCE AREA/FLEET TRUCKING MAINTENANCE AREA PARTS WASHERS (3A, 3B AND 3C)
 - 4 FORMER IDW TEMPORARY STORAGE AREA
 - 5 SATELLITE ACCUMULATION AREAS (5A, 5B, 5C AND 5D)
 - 6 RELEASES FROM 8,000-GALLON AST
 - 7 FORMER DIP TANK
 - 8 WASTE ACCUMULATION AREA
 - 9 BOILER ASH COLLECTION AREA
 - 10 USED OIL TRUCKING MAINTENANCE SHOP
 - 11 FORKLIFT MAINTENANCE AREA USED OIL
 - 12 TRASH COMPACTOR
 - 13 CARDBOARD COMPACTOR
 - 14 FORMER 4,000-GALLON UST AND ASSOCIATED DIP TANK
 - 15 12,000-GALLON DIESEL FUEL UST

- AOC**
- 1 DIESEL FUEL SPILL
 - 2 FORMER DIP TANK 1
 - 3 FORMER GASOLINE PUMP AND ASSOCIATED UST
 - 4 FORMER DIESEL PUMP AND ASSOCIATED UST



- LEGEND**
- WELL WITH FREE PRODUCT
 - MONITORING WELL
 - SOIL BORING/PIEZOMETER
 - SOIL SAMPLE
 - SURFACE WATER/SEDIMENT SAMPLE
 - TEMPORARY MONITORING WELL
 - MANHOLE
 - STREAM MONITORING POINT
 - MW MANUFACTURERS PROPERTY
 - FENCE
 - RETAINING WALL
 - EXPOSURE AREA 1
 - EXPOSURE AREA 2
 - EXPOSURE AREA 3
 - EXPOSURE AREA 4
- SWMU/AOC**
- SWMU/AOC RECOMMENDED NO FURTHER ACTION
 - SWMU
 - AOC
 - RAILROAD
 - PARCELS
- PENTACHLOROPHENOL EXCEEDANCES IN SOIL (MCL-BASED SSL = 0.0014 mg/kg)**
- 0.0014 - 5
 - 5 - 100
 - > 100
 - NON-DETECT
- PENTACHLOROPHENOL EXCEEDANCES IN SURFACE WATER (AQWC = 0.03 µg/L)**
- 0.03 - 1
 - > 1
- PENTACHLOROPHENOL EXCEEDANCES IN SEDIMENT (RESIDENTIAL SOIL RSL = 1 mg/kg)**
- > 1
- PENTACHLOROPHENOL EXCEEDANCES IN GROUNDWATER (MCL = 1 µg/L)**
- 1 - 100
 - 100 - 1,000
 - 1,000 - 5,000
 - > 5,000

HALEY ALDRICH 433 NORTH MAIN STREET
ROCKY MOUNT, VIRGINIA

PENTACHLOROPHENOL EXCEEDANCES IN SOIL (LEACH-BASED), GROUNDWATER, SEDIMENT AND SURFACE WATER

FEBRUARY 2020 **FIGURE 1**

Administrative Record

Index of Documents for Statement of Basis

MW Manufacturers, Inc.
EPA ID No. VAD058205170
Rocky Mount, Virginia

This index includes documents that the Virginia Department of Environmental Quality (DEQ) relied upon to develop and propose the final remedy selection determination described in the Statement of Basis. These documents were prepared for the MW Manufacturers facility and are listed chronologically by document date.

- 1) Description of Current Conditions. Groundwater & Environmental Services (GES). November 2011.
- 2) Report of RCRA RFI, MW Manufacturers, Inc., Rocky Mount, VA. Haley & Aldrich, Inc. December 2015.
- 3) Response to Comments (Part 1) dated June 10, 2016 – Report on RCRA RFI, August 11, 2016.
- 4) Report of Phase 2 RCRA RFI, Rocky Mount, VA. Haley & Aldrich, Inc. October 2018
- 5) DEQ Correspondence re: Phase 2 RCRA Facility Investigation (RFI) Review and Path Forward. Virginia Department of Environmental Quality, January 4, 2019.
- 6) Migration of Contaminated Groundwater Under Control, Environmental Indicator (CA750). Virginia Department of Environmental Quality, February 12, 2019.
- 7) Current Human Exposures Under Control Environmental Indicator (CA725). Virginia Department of Environmental Quality February 12, 2019.
- 8) Limited Corrective Measures Study. MW Manufacturers, Inc. Haley & Aldrich, Inc. September 6, 2019.