



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 3
STATEMENT OF BASIS
FORMER ADAMSON DEVELOPMENT CORPORATION OF AMERICA
BUFFALO JUNCTION, VIRGINIA
EPA ID NO. VAD982573164
June 25, 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 Former Adamson Development Corporation of America Facility located at Route 49 and Tank Road, Buffalo Junction, VA 24529 (hereinafter referred to as the Facility) EPA ID No. VAD982573164.

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 January 30, 2009. 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

The Former Adamson Development Corporation of America Facility was comprised of a single structure located on an 18-acre site. The site is located in a rural residential portion of Mecklenburg County, Virginia.

The Development Company of America, LLP (DCA) acquired the Facility in February 1978 as part of a sale/leaseback arrangement. DCA was a developer that leased properties for office industrial and commercial uses. The subject Facility was leased to Adamson for an unknown period of time. In February 1994, Adamson filed for bankruptcy and subsequently ceased operations at the site. The name of the current owner of the site is DCA, located in Westminster, Maryland.

Adamson manufactured aboveground and underground storage tanks at the Facility, and was a registered small quantity generator of waste from 1988 to 1998. It is believed that during the manufacturing process, xylene and methyl ethyl ketone were used for the cleaning of the spray equipment following the application of paint to the tanks.

III. SUMMARY OF ENVIRONMENTAL HISTORY

In 1990, an investigation was conducted by the Virginia Department of Waste Management (DWM), predecessor to the VDEQ, in response to an employee complaint indicating potential hazardous waste burial at the site. Materials identified during the investigation were determined to be non-hazardous and were disposed of off-site as a solid waste.

In anticipation of lease rejection due to the pending Adamson bankruptcy, DCA had a Phase I Site Assessment completed in September 1994. Through this process, DCA learned of the earlier employee complaint and the potential materials at the site.

A Phase II Site Investigation was subsequently completed on behalf of DCA in November 1994, revealing buried paint containers, consisting mainly of 5-gallon paint cans and other materials. The VDEQ site investigations conducted in March and April 1995 revealed additional buried paint containers, drums, and waste materials.

Following site investigation work, under the oversight of the VDEQ in 1996, DCA paid for the removal, treatment, and disposal of the following:

- Between 2,500 and 3,000 one-gallon and five-gallon paint containers
- 75 fifty-five gallon drums
- Waste materials from the excavated soils

None of containers held any free liquids, although some contained solidified paint.

Paint solids removed from the containers and drums and solid waste materials removed from the excavations were subsequently characterized as D007 (Chromium) hazardous

wastes. All outside concrete pads were also scraped to remove flaking paint. In all, forty-one cubic yard waste boxes were used for the on-site storage of the generated hazardous wastes from the facility clean-up. The boxes were subsequently shipped to Laidlaw Environmental Services of South Carolina for treatment and disposal as a RCRA regulated hazardous waste.

All empty five-gallon containers were crushed and the fifty-five gallon drums had the tops and bottoms removed and bodies crushed. All scrap metal was loaded into dump trailers and was subsequently disposed of at USA Waste in Amelia, Virginia (a RCRA Subtitle D Landfill).

In addition, Adamson had stored a twenty-ton roll-off container, which was found to contain solidified and semi-solidified urethane (a non-hazardous waste). Urethane solids were also disposed at USA Waste in Amelia, Virginia (a RCRA Subtitle D Landfill).

Five piles of soil, Piles A - E, were also generated due to the excavation and separation of the paint cans and drums noted above. Excavated soils were analyzed, determined to be non-hazardous, and were subsequently placed back on-site in the former excavated areas after the VDEQ's approval.

After the aforementioned removal action, a Consent Order was issued by the VDEQ in September 1997, requiring the Facility to close the areas of the former buried waste to meet the closure requirements for a "surface impoundment." under the RCRA Regulations. A Closure Plan was received by the VDEQ in 1997 and approved by the VDEQ in 1998.

A Closure Report was submitted to the VDEQ in July 1999 to demonstrate "clean closure" of the soils for the land disposal unit. A Closure Report dated March 2003 and subsequent information was submitted in October 2003, to demonstrate compliance with the "clean closure" requirements for groundwater at the land disposal unit.

DCA was able to demonstrate achievement of "clean closure" of both the soils and groundwater at the site in accordance with the RCRA performance standards for a land-based unit. Verification and approval of "clean closure" for soils and groundwater was provided by VDEQ in correspondence, dated September 2001, and April 2004, respectively.

On June 15, 2009, DCA abandoned six monitoring wells per VDEQ request as documented in their June 19, 2009 Monitoring Well Closure Report, prepared by WEL Incorporated.

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 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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