



**UNITED STATES**  
**ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**STATEMENT OF BASIS**  
**CONTROLS CORPORATION OF AMERICA**  
**CONCOA**  
**VIRGINIA BEACH, VIRGINIA**  
**EPA ID NO. VAD 098 442 148**  
**APRIL 28, 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 Controls Corporation of America (CONCOA) Facility located at 1501 Harpers Road, Virginia Beach, VA 23454 (hereinafter referred to as the Facility) EPA ID No. VAD098422148.

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 December 24, 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**

The CONCOA Facility manufactures precision gas control products. The Facility purchases and manufactures various components, and assembles the components into gas control products, which are sold to various industries. Typical customers include laser cutting, welding companies, laboratories, pharmaceutical companies, scientific companies. CONCOA operations are housed in a 120,000-square foot building on a 19-acre lot. Twelve acres of property are undeveloped. The Facility is bounded by Naval Air Station Oceana to the north, an apartment complex to the east, and relatively undeveloped land to the south and west.

CONCOA operations began in 1978 as a division of Airco. In 1987, the Facility underwent a change in ownership, and became CONCOA.

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

The CONCOA Facility is currently a large quantity generator (LQG) of hazardous waste under the Virginia Hazardous Waste Management Regulations (VHWMR) and the RCRA Regulations. The Facility operated a hazardous waste container storage area under Interim Status under the RCRA Regulations from November 1980 until February 1985. "Clean closure" of the hazardous waste container storage area was approved by the VDEQ in February 1985.

As of the April 2008 site visit, the Facility operated four satellite accumulation areas for hazardous waste and operated one less than 90-day hazardous waste accumulation area for management and storage of hazardous waste. Hazardous wastes are generated from the following: corrosive solids/filter press cake sludge generated from an on-site wastewater pretreatment system, oil/water separators, floor sweepings, parts cleaners, waste flammable liquids, and waste cleaners.

As of the April 2008 site visit, the Facility operated an on-site wastewater pretreatment system for treatment of wastewater from a chromating process prior to discharge to the Publicly Owned Treatment Works (POTW) under a pre-treatment Virginia Pollution Discharge Elimination System (VPDES) Permit. Sludge generated from the above

pretreatment system is managed as a hazardous waste and removed quarterly for off-site treatment and/or disposal.

The facility's potable water supply is from the City's Public Water Supply (PWS) and industrial and sanitary wastewaters are discharged to the Hampton Roads Sanitation District (HRSD). The facility utilizes a production well located on-site for manufacturing process water only.

The Facility applied for an air permit in 1995 for the following emission sources: heating units, lacquer spraying, degreasing operations and an oil/water separator.

As of the December 2008 Final Site Visit Report, there is no history of spills or unpermitted releases to the environment from Facility operations.

#### **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:

U.S. EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Mr. Denis Zielinski (3LC20)  
Phone: (215) 814-3431  
Fax: (215) 814-3114  
Email: [zielinski.denis@epa.gov](mailto:zielinski.denis@epa.gov)