



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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Director

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April 16, 2015

Mr. Randy Martin  
Executive Director/C.E.O.  
The WRHA Inc.  
170 Hedgefield Lane  
Wytheville, VA 24382

### VIA ELECTRONIC MAIL

**RE: Final Decision and Response to Comments  
Former Emerson Electric Corporation – Lot 2, Wytheville, VA  
EPA ID No. VAD065415457**

Dear Mr. Martin,

Please find enclosed with this letter the Final Decision and Response to Comments developed by the Department of Environmental Quality (DEQ), Office of Remediation Programs (Department) for the Former Emerson Electric Corporation – Lot 2 facility located in Wytheville, Virginia. The 30 day public notice soliciting comments on the Department's determination described in the Statement of Basis dated March 10, 2015 ended on April 13, 2015. No comments were received by the Department during the public comment period. Consequently, the Department's determination did not change.

Please feel free to contact me if you have any additional questions or concerns at (804) 698-4045 or [ryan.kelly@deq.virginia.gov](mailto:ryan.kelly@deq.virginia.gov).

Sincerely,

A handwritten signature in black ink that reads "Ryan J. Kelly".

Ryan J. Kelly  
RCRA CA Project Manager  
Office of Remediation Programs

Mr. Randy Martin  
April 16, 2015  
Page 2

Enclosure

Cc: Andrea Barbieri – EPA Region 3 (3LC50)  
Mike Jacobi – EPA Region 3 (3LC20)  
Dan Manweiler, DEQ-SWRO  
Dave Sarr – WSP  
Clarence Myers – Emerson  
Fred Riley – Riley Construction  
Ben Henderson - Environmental Control Opportunities, LLC  
File – DEQ CO



**FINAL DECISION AND RESPONSE TO COMMENTS**

**FORMER EMERSON ELECTRIC CORPORATION – LOT 2**

**WYTHEVILLE, VIRGINIA**

**EPA ID NO. VAD065415457**

I. FINAL DECISION

The Virginia Department of Environmental Quality (DEQ) has determined that no further action is required to make this property suitable for any type of land use. This is based on our findings detailed in the Statement of Basis, dated March 10, 2015. This determination is consistent with EPA's February 2003 Final Guidance of Completion of Corrective Action Activities at RCRA Facilities (reference 68 FR 8757).

II. PUBLIC COMMENT PERIOD

On March 10, 2015, DEQ proposed a determination of "Corrective Action Complete without Controls". Consistent with public participation provisions under the Resource Conservation and Recovery Act (RCRA), DEQ requested comments from the public on the proposed determination described in the Statement of Basis. The commencement of a thirty (30)-day comment period was announced in the Wytheville Enterprise newspaper on March 14, 2015 and on the DEQ website. The public comment period ended on April 13, 2015.

III. RESPONSE TO COMMENTS

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

IV. AUTHORITY

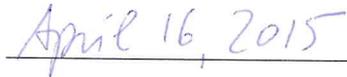
DEQ is issuing this Final Decision under the authority of the Solid Waste Disposal Act, as amended by RCRA, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

V. DECLARATION

Based on the Administrative Record compiled for the Corrective Action at the former Emerson Electric Corporation – Lot 2 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.



\_\_\_\_\_  
Jutta Schneider, Acting Director  
Office of Remediation Programs  
Virginia Department of Environmental Quality



\_\_\_\_\_  
Date

Attachment A: Statement of Basis, dated March 10, 2015



**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DIVISION OF LAND PROTECTION AND REVITALIZATION**

**OFFICE OF REMEDIATION PROGRAMS**

**STATEMENT OF BASIS**

**FORMER EMERSON ELECTRIC CORPORATION – LOT 2**

**WYTHEVILLE, VIRGINIA**

**EPA ID NO. VAD065415457**

**MARCH 10, 2015**

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**Figure – Survey Plat**

## **1.0 INTRODUCTION**

### **1.1 Facility Name**

The Virginia Department of Environmental Quality (VDEQ) has prepared this Statement of Basis (SB) for Lot 2 of the Former Emerson Electric Corporation (formerly known as Alco Controls Division Products) facility located at 555 Peppers Ferry Road, Wytheville, Virginia 24382 (hereinafter referred to as the Facility, Site, or “Emerson Electric”).

The Facility is subject to the Corrective Action (CA) 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 cleaned up any releases of hazardous waste and waste constituents that have occurred at their site.

Information on the Corrective Action Program can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

VDEQ has prepared this SB in cooperation with the United States Environmental Protection Agency (EPA) and is providing the opportunity for public comment and review on its proposed decision.

### **1.2 Proposed Decision**

VDEQ has reviewed all available Facility data and has determined that there are no unaddressed releases of hazardous waste or hazardous constituents from Lot 2 of the Facility (Lot 1 and Lot 3 are not included in this proposed decision). Based on its review, VDEQ’s proposed decision is that no additional characterization or remediation is necessary for Lot 2. VDEQ’s proposed decision represents “Corrective Action Complete without Controls” as described in EPA’s “Final Guidance on Completion of Corrective Action Activities at RCRA Facilities”, (68 FR 8757, February 25, 2003). VDEQ has determined that its proposed decision for Lot 2 of the Facility is protective of human health and the environment and that no further corrective action or controls are necessary.

This SB summarizes information that can be found in greater detail in the documents and reports reviewed by VDEQ and EPA, which can be found in the Administrative Record (AR).

### **1.3 Public Participation**

Interested persons are invited to comment on VDEQ’s proposed decision by reviewing this SB and the documents contained in the AR. The information presented in this SB can be found in greater detail in the work plans and reports submitted by the Facility to VDEQ and EPA. To gain a more comprehensive understanding of the RCRA activities

that have been conducted at the Facility, VDEQ encourages the public to review these documents, which are found in the AR. A copy of the AR is available for public review in paper or electronic format from the VDEQ contact person, for which the address and telephone number is provided in Section 6.0 below.

When making a determination regarding the proposed decision, VDEQ will consider all written comments received during the comment period (see Section 6.0). If VDEQ determines that new information or public comments warrant a modification to the proposed decision, VDEQ will modify the proposed decision or select other alternatives based on such new information and/or public comments. VDEQ will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC).

## **2.0 FACILITY BACKGROUND**

The former Emerson Electric facility is located at 555 Peppers Ferry Road, Wytheville, Wythe County, Virginia. The facility originally consisted of four buildings which were situated on a 21.8-acre parcel. The entire Emerson facility contains three distinct parcels (lots). Lot 1 is 1.5 acres in size and is located at the north end of the site, next to Peppers Ferry Road. The area was formerly used as an employee parking lot, and there were no buildings on the lot. Lot 2 is located to the south of the facility, and consists of 8.428 acres of undeveloped open land. No manufacturing or operations were conducted on Lot 2. Lot 3 consists of approximately 12 acres and contains the former Emerson manufacturing plant and surrounding land. All manufacturing operations took place on Lot 3, where the original facility buildings were constructed. Lots 1 and 3 were never legally subdivided, but the distinction between the two lots was used during recent environmental investigations and remediation of the site. The attached figure (survey plat) shows the location and extent of Lot 2.

The former facility is situated on a topographic high point, at an elevation of approximately 2,440 feet above mean sea level. The land gently slopes away on all sides of the buildings. The closest surface water body is a spring fed pond approximately 1,000 feet east of the facility. No wetlands are located on the site and the facility is not located in a flood-prone area.

Reportedly, the original facility buildings were constructed in 1935 on farmland. The facility operated as a textile mill and then as a knitting mill (Wyomissing Corporation) until approximately 1974, when Tuttle Electric (a division of Emerson) began operations. Tuttle Electric manufactured heating elements for commercial dryers and refrigerators. Chromolox (a division of Emerson) leased the southern portion of the building from approximately 1974 to 1977. An addition was added to the southern portion of the facility in the early 1950s. The first courtyard (former location of Bright Dip operations) was enclosed in 1974. The second courtyard was enclosed circa 1975 and the current maintenance area was enclosed during approximately the same year.

Emerson manufactured control valves for residential and commercial refrigeration appliances. The facility buildings covered approximately 139,000 square feet of space,

which consisted of approximately 2,500 square feet of office space, 120,000 square feet of manufacturing space, and 11,500 square feet of storage space. Former outdoor features included a chip storage area and two paved parking lots.

Primary operations conducted onsite included turning, welding, honing, grinding, spray painting, assembling, testing, warehousing, and packaging. Alco Controls operated under the Standard Industrial Classification code 3491, which is specific to establishments involved in industrial valve manufacturing (North American Industry Classification System code 332911). Raw materials previously used at the facility include nitric acid, sulfuric acid, hydrochloric acid, chromic acid, Freon, and 1,1,1-trichloroethane (TCA). Small quantities of nitric acid and sulfuric acid were present in the wastewater laboratory.

The former Emerson facility is located in a commercial and light industrial area on the north side of Wytheville. The facility is currently bordered by two hotels, Wytheville Community College to the north and east, the Wytheville Regional Housing Agency to the south, and Peppers Ferry Road to the north and west. Interstate 81 is located farther to the north (approximately 0.5 mile) of the facility.

Operations ceased at the facility in approximately 2001 and the facility was closed. The site was held by Emerson Charitable Trust until the entire site sold to Riley Construction Company, Inc. on February 7, 2013. Riley Construction subsequently sold Lot 2 to the Wytheville Regional Housing Agency, Inc. on February 28, 2013. The Wytheville Regional Housing Agency plans to redevelop Lot 2 in the near future.

### **3.0 SUMMARY OF ENVIRONMENTAL HISTORY**

The following is a list of RCRA Corrective Action milestones that have been completed at the Facility and are relevant to VDEQ's decision to recommend a "Corrective Action Complete Without Controls" determination for Lot 2:

- On August 28, 2008, representatives from the USEPA and VDEQ conducted a site visit at the former Emerson facility. Representatives from Tetra Tech EC, Inc. and WSP Environment and Energy (consultant for Emerson) attended the facility visit. The purpose of the visit was to tour the site and discuss the RCRA CA program and responsibilities.
- On October 8, 2008, Emerson sent the EPA and VDEQ a letter of commitment to conduct CA at the Emerson facility using the Facility Lead Agreement (FLA). The EPA delegated the VDEQ as the lead agency for technical and administrative oversight of RCRA Corrective Action activities under the FLA.
- On February 18, 2009, the Final RCRA Corrective Action Site Visit Report was issued to the USEPA and VDEQ by Tetra Tech EC, Inc. (under contract with USACE).

From 2008 to present, Emerson and their consultant WSP have worked with the VDEQ to implement the requirements of RCRA CA under the FLA. Activities have primarily been associated with Lots 1 and 3, and areas downgradient of the former facility. No

contamination or areas of concern are known to exist on Lot 2. Lot 2 was utilized as a location to obtain background soil samples during historical investigation activities. In addition, groundwater monitoring well MW-06, which is located near the boundary of Lots 2 and 3, was shown to have no constituents of concern above screening levels from September 2003 through August 2009, and as a result, monitoring was discontinued after 2009. These soil and groundwater results provide further evidence that Lot 2 has been unaffected by past operations. Emerson will continue to address environmental impacts associated with Lots 1 and 3 under RCRA CA until all requirements have been fulfilled.

#### Other Environmental Activities

Emerson submitted applications to participate in the VDEQ's Voluntary Remediation Program (VRP) on October 24, 2003. Lots 1 and 3 were accepted into the VDEQ's VRP on February 10, 2004 and April 28, 2004, respectively. Lot 2 was not impacted by the industrial operations at the facility and therefore, was not enrolled into the VRP. Various investigation and remedial activities were conducted under the VRP program. The VDEQ's VRP issued a Certificate of Satisfactory Completion of Remediation on July 9, 2007, which specified institutional controls for Lot 1 and Lot 3 in the form of land and groundwater use restrictions.

#### **4.0 ENVIRONMENTAL INDICATORS**

Under the Government Performance and Results Act ("GPRA"), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, 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 September 28, 2009 and September 17, 2010, respectively.

#### **5.0 FINANCIAL ASSURANCE**

Since no further investigations or corrective actions are anticipated based on the available information, financial assurance for corrective action is not required for Lot 2 of the Facility.

#### **6.0 PUBLIC PARTICIPATION**

Interested persons are encouraged to review the AR and are invited to comment on VDEQ's proposed decision. The Administrative Record contains all the information considered by VDEQ for its proposed remedy for the Facility. 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, e-mail, or phone to Ryan Kelly at the address listed below. VDEQ will hold a public meeting to discuss the proposed decision upon request. Requests for a public meeting should be made to Ryan Kelly.

Virginia Department of Environmental Quality  
629 East Main Street  
P.O. Box 1105  
Richmond, VA 23218  
Contact: Mr. Ryan J. Kelly  
Phone: (804) 698 - 4045  
Email: [ryan.kelly@deq.virginia.gov](mailto:ryan.kelly@deq.virginia.gov)

VDEQ will respond to all relevant comments received during the comment period. If it's determined that new information warrant a modification to the proposed decision, VDEQ will modify the proposed decision or select other alternatives based on such new information and/or public comments. VDEQ will announce its final decision and explain the rationale for any changes in the FDRTC. All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Ryan Kelly at the address listed above.

Date:

*March 10, 2015*

*Jutta Schneider*

Jutta Schneider, Acting Director  
Office of Remediation Programs  
Virginia Department of Environmental Quality



FORMER EMERSON ELECTRIC CORPORATION – LOT 2  
WYTHEVILLE, VIRGINIA  
EPA ID NO. VAD065415457

ADMINISTRATIVE RECORD  
INDEX OF DOCUMENTS FOR STATEMENT OF BASIS DATED  
MARCH 10, 2015

This index includes all documents VDEQ relied upon to evaluate and propose the final decision of “Corrective Action Complete Without Controls” described in the Statement of Basis.

1. October 8, 2008, Facility Lead Corrective Action Agreement between EPA and (signed by) Emerson.
2. February 18, 2009, *Final RCRA Corrective Action Site Visit Report*. Tetra Tech EC, Inc.
3. January 29, 2014, *Annual Report, Former Alco Controls*. WSP.