



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 3
STATEMENT OF BASIS
PARAMONT MANUFACTURING, LLC
ABINGDON, VIRGINIA
EPA ID NO. VAD 000 619 734
May 12, 2010

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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 Paramont Manufacturing Facility located at 18259 Westinghouse Road, Abingdon, VA 24201 (hereinafter referred to as the Facility) EPA ID No. VAD000619734.

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 August 11, 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

Paramont is a polymer reaction injection molding facility that manufactures rubber and plastic molded products such as engine hoods and bumpers. Paramont purchased the Facility in 1999 and began operations in April 2001.

The Facility building is over 300,000 ft² in size and was constructed by Westinghouse in a manufacturing and residential area. Westinghouse, Electric Materials Division manufactured copper wire at the Facility until 1995/1996. The Facility was vacant from 1996 until 1999.

The Facility uses public water for its potable water supply and the Publically Owned Treatment Works (POTW) for wastewater. A 300,000-gallon water supply tank for fire protection is located at the Facility and owned by Washington County.

III. SUMMARY OF ENVIRONMENTAL HISTORY

Westinghouse submitted RCRA Part A and Part B Applications in 1980 and 1981, respectively for operations subject to RCRA regulation, including the storage of hazardous wastes. Wastes were managed in containers and tanks from December 1980 until April 1986 when the solid waste management units (SWMUs) were "clean closed" under the supervision of VDEQ. Westinghouse operated as a large quantity generator of hazardous waste (LQG) and shipped hazardous wastes to an off-site treatment and disposal (TSD) facility under Interim Status.

Paramont Facility representatives have indicated that Westinghouse production operations ceased in the fall of 1995, and that a three stage environmental assessment and remediation activities were performed at the site in 1996. In 1999, a Phase II Environmental Site Assessment report documented that no sampling results detected any hazardous materials in hazardous concentrations present at the site.

Polychlorinated Biphenyls (PCBs) and asbestos were identified at the site during the investigation. Facility contacts indicate that these contaminants were cleaned-up and removed prior to Paramont purchasing the Facility.

Westinghouse operated an Animal Fat Wastewater Lagoon for treatment of wastewaters including residual animal fat from wire lubrication. Lagoon effluent was discharged to surface waters under a Virginia Pollutant Discharge Elimination System (VPDES) Permit. The lagoon underwent closure prior to Paramont's purchase.

Westinghouse stored copper ingots outside on concrete pads prior to smelting. Wastes were stored outside on concrete pads, inside a 3-wall shed, inside the building, and in tanks which had secondary containment. Westinghouse stored hazardous waste in 55-gallon drums in an area with a capacity of 80 drums and in a tank with a capacity of 5,000 gallons.

Copper smelting equipment was known to contain asbestos materials. The smelting equipment was removed prior to Paramont's purchase of the Facility.

Westinghouse operated an oil recovery system and maintenance area with two sumps. The oil recovery system was decommissioned prior to Paramont purchasing the facility. The maintenance area underwent closure activities, and was converted to a clean storage area by Paramont.

Ten aboveground storage tanks (ASTs) were used at the Facility for storage of petroleum, diesel fuel, and kerosene. The ASTs were reportedly removed in 1992 by Westinghouse.

Paramont operates an Air Purifying Bag Filter Unit to purify air in the manufacturing area, as well as drum collection of polyvinyl alcohol waste.

Paramont Manufacturing is a large quantity generator of hazardous waste (LQG). Waste polymer from the trimmings of molded products is disposed of off-site in a RCRA Subtitle D Landfill. Four ASTs and a lube pit for the storage of raw materials are located within the Facility. An oil/water separator with a sump is also located at the Facility.

Paramont operates a paint and lacquer storage room, two paint kitchens, and two paint booths. The paint and lacquer storage room serves as a less than 90-day hazardous waste accumulation area for materials generated from the painting operation.

Stormwater from the Facility loading dock and several drains is held in a concrete storage pit for inspection prior to release to the stormwater conveyance system.

In summary all media was investigated at the Facility. EPA and VDEQ found no evidence of any spills or releases after Paramont purchased the Facility. The only hazardous waste releases occurred prior to Paramont purchasing the property from Westinghouse. A three stage environmental assessment and remediation activities were performed at the site in 1996 by Westinghouse to remediate the releases. The Facility

was cleaned up, tanks removed and the lagoon clean closed under the jurisdiction of VDEQ. In 1999, a Phase II Environmental Site Assessment report documented that no sampling results detected any hazardous materials in hazardous concentrations present at the site.

Therefore, it has been determined that based upon the available administrative record, no threat to human health or the environment exists from the facility operations and past releases or potential releases which are subject to RCRA Corrective Action.

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
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Contact: Mr. Denis Zielinski (3LC20)
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