

STATEMENT OF BASIS

Former Royston (Lofton and AWH Manufacturing) Facility
271 Lofton Road
Lofton, Virginia
EPA ID No. VAD 980 831 283

I. INTRODUCTION

This Statement of Basis is for the Former Royston (Lofton and AWH Manufacturing) facility located at 271 Lofton Road in Lofton, Augusta County, Virginia. After reviewing files, the results of a recent inspection and numerous work plans and reports, the U.S. Environmental Protection Agency (EPA) believes that no further corrective action is necessary at the Former Royston facility at this time. The purpose of this document is to solicit public comment on this proposal.

The Former Royston facility is subject to the Corrective Action program under the Resource Conservation and Recovery Act (RCRA). For more information on RCRA Corrective Action, please visit EPA Region III's web site at www.epa.gov/reg3wcmd/correctiveaction.htm. The Corrective Action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. Region III is using the administrative procedures found in 40 CFR Part 270 to solicit public comment prior to making its final corrective action decision for the former Royston facility.

II. FACILITY BACKGROUND

The former Royston facility consists of a 215,000 square-foot former metal fabricating and manufacturing facility and associated wastewater treatment facility (WWTF) located on approximately 149 acres in Lofton, Virginia. Lofton Corporation purchased the property in 1982. The facility was operated by Lofton Corporation between 1985 and 2000. Lofton Corporation produced various metal products including shipboard furniture, walls, ceilings, and doors as well as custom sheet metal products for various industrial purposes. Lofton Corporation was a large quantity hazardous waste generator.

The site was mostly unoccupied and occasionally used for miscellaneous warehousing purposes between 2000 and 2004. The site was purchased by the current owner, Bill Neff Enterprises, in 2004. MeadWestvaco currently leases the facility from Bill Neff Enterprises to store paper products. MeadWestvaco intends to have the property developed as a distribution center by adding additional warehousing space in currently undeveloped portions of the property.

The area surrounding the site is predominantly used as farmland. The soils underlying the facility are predominantly silty sands and clays. Bedrock has not been encountered beneath the site during investigation activities. Groundwater was observed beneath the site at depths ranging from 4.70 ft bgs to 16 ft bgs. Groundwater in the surficial aquifer flows toward the northwest under an approximate hydraulic gradient of 0.024 ft/ft. An intermittent stream associated with Poor Creek is located along the western site property boundary.

III. INVESTIGATIONS

In 1998 the Virginia Department of Environmental Quality (VDEQ) prepared a Site Inspection and Site Assessment for NCAPS Site Assessment Report. This report identified 42 solid waste management units (SWMUs) at the site. Information from a letter dated July 9, 1998 from VDEQ to AWH Corporation regarding Lofton Corporation, Greenville, Virginia, indicated that three of the SWMUs have been closed and were issued No Further Action (NFA) determinations by VDEQ.

On September 7, 2006 an onsite meeting and a site visit was conducted by EPA, its consultant and VDEQ. This meeting focused on gathering factual information on the remaining 39 SWMUs. The information was documented in a report dated March 19, 2007.

Bill Neff Enterprises entered into a RCRA Facility Lead Agreement with EPA Region III on July 6, 2006. As part of that Agreement, a RCRA Corrective Action Assessment Work Plan was developed by MeadWestvaco to conduct investigations at the site. The Work Plan was approved by EPA and the investigations of the 39 SWMUs were conducted in December 2006. Results of the investigation revealed the presence of low levels of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and inorganic compounds in soil and/or groundwater. With the exception of arsenic in the soils at one SWMU, the detected concentrations did not exceed the USEPA Region III risk-based concentrations. Arsenic was not detected in groundwater above laboratory detection limits.

At the request of EPA, MeadWestvaco collected additional soil samples in May 2007 to further evaluate the presence of arsenic around the paint shop and paint kitchen building. Results of the sampling revealed arsenic concentrations consistent with previous findings.

IV. EXPOSURE PATHWAYS

Arsenic was detected in soils, at the site, at one SWMU, at concentrations up to 45 mg/kg. Additionally, the concentrations are greater than the USEPA Region III Risk-Based Concentrations (RBCs) for residential soil (0.43 mg/kg) and industrial soil (1.9 mg/kg) (USEPA, 2006). The Region III RBCs for arsenic in soil are based on the potentially carcinogenic effects of arsenic at a one in a million (10^{-6}) risk level. However, the concentrations of arsenic detected in most samples were within or close to background levels. To fully evaluate potential risks from arsenic, a human health risk assessment (HHRA) was conducted.

EPA's Toxicologist determined that the results of this HHRA indicate that concentrations of arsenic in soil at the site do not pose potentially unacceptable risks to a future on-site worker, future construction worker, or a hypothetical future on-site resident. Therefore, no further evaluation or action was warranted for arsenic at the Former Royston Manufacturing Facility.

V. CONCLUSION

EPA believes that it is appropriate to make a no further corrective action determination at the former Royston facility in Lofton, Virginia.

V. PUBLIC PARTICIPATION

EPA is requesting comments from the public on its tentative decision that no further corrective action is required at this time. The public comment period will last forty-five (45) calendar days from the date that this matter is publicly noticed in a local newspaper (August 10, 2007 to September 24, 2007). Comments should be sent to EPA in writing at the EPA address listed below, and all commenter's will receive a copy of the final decision and a copy of the response to comments.

A public hearing will be held upon request. Requests for a public hearing should be directed to Denis M. Zielinski of the EPA Regional Office at the address below or at (215) 814-3431.

The Administrative Record contains all information considered by EPA when making this proposal. The Administrative Record is available at the following locations:

U.S. Environmental Protection Agency – Region III
1650 Arch Street – 3WC23
Philadelphia, PA 19103-2029
Contact: Denis M. Zielinski
Voice: (215) 814-3431
Fax: (215) 814-3113
Hours: Monday – Friday, 8:00am – 5:00pm
E-mail: zielinski.denis@epa.gov

Staunton Public Library
(Temporary Reference Documents)
1 Churchville Ave.
Staunton, VA 24401
Phone: (540) 332-3902
Hours: Monday – Thursday, 9:00am – 9:00pm
Friday – Saturday, 9:00am – 5:00pm

Following the forty-five (45) calendar day public comment period, EPA will prepare a Final Decision which will address all written comments and any substantive comments presented verbally at a public meeting, if requested. This Final Decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to this proposal, EPA will seek public comments on the revised proposal.