



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 3
STATEMENT OF BASIS
R. R. DONNELLEY AND SONS
LYNCHBURG, VIRGINIA
EPA ID NO. VAD 055 048 532
APRIL 7, 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 R. R. Donnelley and Sons Company (RRD) Facility located at 4201 Murray Place, Lynchburg, VA 24501 (hereinafter referred to as the Facility). (EPA ID No. VAD055048532.)

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 March 18, 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

R. R. Donnelley and Sons (RRD) is a rotogravure printing plant, currently operating eight presses, and seven Aboveground Storage Tanks (ASTs) for solvent, ink and fuel storage. The Facility is located in an industrial and residential area. Facility operations began with two printing presses in 1971; another six presses have been added since that time. RRD purchased the Facility in 1990. The Facility produces catalogs and advertising flyers (e.g., newspaper inserts) for major retail corporations.

The facility is supplied with potable water by the City of Lynchburg and discharges sanitary sewage to the Publically Owned Treatment Work (POTW). The closest water body is Fishing Creek, northeast of the site.

The closest residence is approximately ½ mile from the RRD Facility.

III. SUMMARY OF ENVIRONMENTAL HISTORY

The Facility operates an Ink Tank Farm, also referred to as the Tank Storage Building. This engineered building houses seven 16,000 gallon ASTs. Two tanks are used for toluene storage, four are used for ink. Fuel and a printing varnish are also stored in the Ink Tank Farm. The Ink Tank Farm building is separate from the Facility's production building, and has concrete secondary containment, ventilation, and fire suppression systems. The Facility unloads raw product to the Ink Tank Farm in an engineered tanker loading area, which is covered with a roof, and has concrete secondary containment.

The Facility is a large quantity generator (LQG) of hazardous waste, with on-site accumulation for less than 90-days. From 1982 to 1984, the storage area operated under Interim Status for storage greater than 90-days; however waste did not accumulate for a period greater than 90-days. Interim Status was terminated by the Virginia Department of Health (VDH), Bureau of Hazardous Waste Management in July 1984. Hazardous wastes

are shipped off-site to treatment, storage and disposal (TSD) or recycling facilities. Floor drains were sealed by RRD when they purchased the facility in 1990.

The facility uses granular activated carbon (GAC) air pollution control units to capture 98.8% of toluene in the ventilation system prior to discharge to the atmosphere. These units use a steam stripping process to recondition the carbon in conjunction with condensers and evaporators to recover the toluene, which is internally reused or sent back to the toluene supplier for re-use.

The Facility operates a wastewater pre-treatment system which processes approximately 5,000 gallons of wastewater per day. System sludge is transported off-site for recycling, while the wastewater is discharged to the sanitary sewer system and publicly owned treatment works (POTW) under a Pretreatment Virginia Pollution Discharge Elimination System (VPDES) Permit issued by the City of Lynchburg.

One solvent release occurred in 1998 to Fishing Creek; however, 2007 confirmatory soil/sediment sampling results indicated concentrations of constituents of concern (COCs) at non-detection or significantly below the USEPA Region III Risk Based Screening Concentrations for industrial and residential scenarios.

Currently the site maintains a Title V Air Permit and a VPDES General Permit for Stormwater Discharges associated with industrial activities; both Permits were issued by the VDEQ. Additionally all hazardous chemicals and wastes are stored in areas with impermeable surfaces and most have secondary containment.

Eighteen Underground Storage Tanks (USTs) were used from 1971 until 1988 for solvent and ink storage. These tanks were removed in 1998, and a 2007 confirmatory soil boring sampling and testing program in the UST areas indicated concentrations in soils/subsoils were below detection limits for the constituents of concern (COCs) including volatile organic compounds (VOCs). Based upon the recent site investigation data, no further action was recommended for the former UST areas.

In summary all media was investigated at the Facility. The only hazardous waste release occurred in 1998, and only one soil/sediment sample returned results above detection limits for one COC. This sample's test results showed the COC in the soil/sediment was significantly below the EPA Region III's Risk Based Screening Concentration levels for soils for industrial and residential scenarios.

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:

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Philadelphia, PA 19103
Contact: Mr. Denis Zielinski (3LC20)
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