



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 3
STATEMENT OF BASIS
SHENANDOAH RECYCLING, INC.
STAUNTON, VIRGINIA
EPA ID NO. VAD 083 045 823
APRIL 9, 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 Shenandoah Recycling, Inc. Facility located at Route 254, Staunton, VA, 24401 (hereinafter referred to as the Facility) (EPA ID No. VAD083045823).

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 13, 2007. 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 Shenandoah Recycling Facility, in operation since 1967, maintains and repairs trucks, and trash compactors. Historically the Facility was a transporter of solid and hazardous wastes; however, the Facility is not currently registered as a transporter of hazardous waste.

The Facility is located on an approximately 300-acre parcel of land in a rural residential and agricultural area of Augusta County, Virginia. The Facility is comprised of a vehicle maintenance building, barn, office building, and silo.

III. SUMMARY OF ENVIRONMENTAL HISTORY

The Shenandoah Recycling Facility has one large vehicle maintenance building, which contains a welding shop; a barn, which is used for storage; an office building; and a silo, which is no longer in use. The maintenance building was constructed in the 1960s, while the barn is approximately 100 years old. The building and parking areas occupy approximately 195 acres, while the remaining 100 acres of the property is vegetated by native grasses and trees.

The Facility driveway and parking lot at the northern portion of the site are paved with asphalt, while various other areas are gravel covered, or vegetated.

At the present time, chemicals are stored in minor quantities at the Facility, and include motor oil, antifreeze, hydraulic fluid, truck wash soap, and windshield washer fluid. These are stored in small drums and containers.

The Facility maintains two Aboveground Storage Tanks (ASTs) of diesel fuel on the northern portion of the site. Two Underground Storage Tanks (USTs) of diesel fuel were removed from the site. Used oil is stored in small ASTs in the maintenance building. The Facility also has one 3,000-gallon diesel AST and one 8,000-gallon (estimated) diesel AST.

Waste oil and parts cleaning solvent are generated and recycled on-site by burning for heat. This burning operation is considered a beneficial use, and therefore does not require a permit.

Truck wash water, and maintenance sink effluent are processed through an oil-water separator prior to surface discharge to a field on the south side of the maintenance shop. There is no discharge permit for this unit. No observed impact to the vegetation was observed from this discharge.

During filling operations of a UST, one documented release occurred. During this event, between 5 and 50-gallons of diesel fuel were discharged onto the ground surface. During fueling operations, the hose containing fuel was removed from the UST, and the fuel was allowed to discharge onto the ground. This release occurred north of the silo from a UST system that has since been removed. The impacted soil was excavated, placed on plastic sheeting, and turned to encourage biodegradation of the fuel. Once biodegradation was complete, the soil was placed at an unknown location on-site. The Virginia Department of Health (VDH), Bureau of Hazardous Waste Management participated in the cleanup of the spilled fuel.

The closest surface water body is Poor Farm Draft, approximately 300 feet north of the Facility. All chemicals and wastes currently stored at the Facility are stored in areas with impermeable floor surfaces and most have secondary containment.

Historic documentation indicates that as a transporter of solid and hazardous wastes, the Facility also placed roll-off containers at client's properties for waste collection. Additional documentation indicates the Facility stored waste on-site until loads were full, or the appropriate disposal Facility documentation was completed. These reports indicate the site was a drum and tank storage Facility, operating under interim status; however, Facility contacts indicate that on-site storage never occurred. The Former Waste Storage Area (also known as Solid Waste Management Unit (SWMU) No. 3) was used to store truck loads of containers and tankers from November 19, 1980 until October 1983. Correspondence from the VDH dated February 16, 1983 documented that a December 8, 1982 Closure Plan had been approved for closure for the Former Waste Storage Area. A final closure inspection of SWMU No. 3 was performed by the VDH on January 31, 1983. Correspondence from the VDH dated January 3, 1984 documented that this SWMU had been properly closed based upon the VDH closure inspection. The Facility was also notified that interim status for the Shenandoah Recycling site was terminated by the Commonwealth of Virginia.

All media was investigated for any past and current releases at the Facility. The only hazardous waste release occurred while filling a UST system as described above, that has since been treated and removed from the spill site. The contaminated material was removed and treated to mitigate any negative impact to the environment and was conducted under the oversight of the VDH.

The EPA and VDEQ believe the required corrective action requirements under the RCRA Regulations for the Shenandoah Facility have been met based upon the findings in the administrative record and Facility site visit. No further action under RCRA corrective action is believed necessary for the Facility to be protective of human health and the environment.

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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Contact: Mr. Denis Zielinski (3LC20)
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