

# **STATEMENT OF BASIS**

**Virginia Commonwealth University-Sanger Hall  
Richmond, Virginia**

**EPA ID No. VAD 000798645**

## **I. Introduction**

This Statement of Basis is for Sanger Hall at the Virginia Commonwealth University (VCU) located in Richmond, Virginia. After reviewing the results of recent site inspections, past environmental practices, historical investigations and remedial activities, the United States Environmental Protection Agency (EPA) believes that no further corrective action is necessary at VCU-Sanger Hall at this time, and is proposing a final decision of Corrective Action Complete Without Controls. This proposal is consistent with current EPA guidance entitled *Final Guidance on Completion of Corrective Action at RCRA Facilities* (February 25, 2003). The purpose of this document is to solicit public comment on the proposal that no further corrective action is required at the facility at this time.

VCU-Sanger Hall is subject to the Corrective Action Program under the Resource Conservation and Recovery Act (RCRA). (For more information on RCRA Corrective Action, please visit the Region III web site at [www.epa.gov/reg3wcmd/correctiveaction.htm](http://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 VCU – Sanger Hall.

## **II. Facility Background**

VCU is a teaching and research institution with two campuses located in Richmond, Virginia. Sanger Hall is located on the East Campus, approximately ½ mile to the west of Interstate 95. It is a large multi-story building that occupies a major portion of the city block within the medical campus.

Sanger Hall has operated as a hazardous waste storage facility since January 15, 1976. Sanger Hall became subject to regulations promulgated under the Resource Conservation and Recovery Act on November 19, 1980.

On September 2, 1983, the Virginia Department of Waste Management (VDWM) requested that VCU submit a Part B application for Sanger Hall. VCU Decided not to pursue a Part B Application, and Sanger Hall's interim status was terminated on November 20, 1984. On February 19, 1985, VDWM approved the closure plan. In a

letter dated July 12, 1985, VDWM approved the final closure of Sanger Hall as a treatment, storage, and disposal (TSD) facility.

While Sanger Hall has been closed as a TSD facility, it still maintains its status as a small-quantity generator of hazardous waste. Hazardous wastes are presently stored at the facility but are removed within the required 90-day period.

### **III. Release History**

There have been no known releases of hazardous waste at VCU-Sanger Hall. During the September 1, 2005 site visit, it was confirmed that only one solid waste management unit (SMWU) exists at Sanger Hall, that being the hazardous waste storage facility in Sanger Hall. The hazardous waste storage unit is located in a locked caged storeroom area of the first floor loading dock. The storeroom measures 20 feet by 13 feet and has a double fence doorway entrance. No containment devices, other than the room itself, are present. There is a storm drain located approximately 20 feet from the entrance to the storage area, however, according to VCU, no release from the storage area has occurred. A spill kit is also in place in the storage area to assist in cleaning up a spill prior to impacting the storm drain. Access to the area is restricted and can only be entered through locked chain link gates.

The hazardous waste storage unit is used for the storage of small containers of generated-wastes, 55-gallon steel drums, and fiberboard drums. The drums and containers seen during the site visit appeared to be new and in very good condition. These drums are used as overpacks for smaller containers of various assorted chemical wastes. The smaller containers are packed into the larger drums with absorbent material. This packing is done inside the hazardous waste storage unit itself.

The number of drums of waste present varies over time, depending on the intervals between the pick up for treatment and disposal offsite by a licensed hazardous waste hauling firm. The wastes are stored in the hazardous waste storage unit for less than 90 days. The generated wastes include spent solvents, corrosives, and other chemical wastes including Waste Flammable Liquid, not otherwise specified (n.o.s.); Waste Poison B Liquid, n.o.s.; and Waste Corrosive-Liquids n.o.s.

### **IV. RCRA Site Visit**

On September 1, 2005 an onsite meeting was held to discuss the facility history, locate previously identified SWMUs, verify the results of a file review and gather information concerning the facility's current conditions. Attendees at the meeting included the Virginia Department of Environmental Quality, VCU, EPA, and the United States Army Corps of Engineers. No additional SWMUs or Areas of Concern were identified during the site visit and observations of the hazardous waste storage area were consistent with the closure of Sanger Hall as a treatment, storage, and disposal facility.

## **V. Conclusion**

The September 1, 2005 site visit at VCU-Sanger Hall concludes corrective action at the facility at this time. The hazardous waste storage area does not pose an unacceptable risk to human health or the environment.

## **VI. Public Participation**

EPA is requesting comments from the public on its tentative decision of Corrective Action Complete without Controls. The public comment period will last thirty (30) calendar days from the date that this matter is publicly noticed in a local newspaper (January 18, 2007 to February 20, 2007). Comments should be sent to EPA in writing at the EPA address listed below, and all who comment will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be directed to Mr. William Geiger of the EPA Regional Office at the address below or at (215) 814-3413.

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: Mr. William Geiger  
Voice: (215) 814-3413  
Fax: (215) 814-3113  
Hours: Monday - Friday, 8:00 A.M - 5:00 P.M.  
E-mail: geiger.william@epa.gov

James Branch Cabell Library  
901 Park Avenue  
PO Box 842033  
Richmond, VA 23284-2033  
(804)828-1110

Following the thirty (30) 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. 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.