



Long-Term Stewardship Assessment Report

**Solutions Way Management
(Former Genicom Corporation)**

EPA ID #: VAD003132438

Waynesboro, Virginia 22980

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Introduction: Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

Site Background: The Solutions Management Way (SMW or Facility) site is located on a 115-acre parcel in Waynesboro, Virginia. Prior to 1954, the site was a grass-strip airfield. In 1954, General Electric (GE) purchased the property and constructed an electromechanical equipment manufacturing plant on the southern portion of the site. Genicom Corporation bought the facility in 1983 and used it to manufacture computer printers and related equipment. In June 2001, SWM purchased the property after Genicom declared bankruptcy in 2000.

The primary waste streams generated at the facility were waste solvents from painting and etching operations, and inorganic wastes generated from plating operations. Much of the site contamination was generated prior to enactment of RCRA requirements in the 1980's during GE's manufacturing operations. Although the site has been contaminated by a range of organic and metal wastes, only TCE and its degradation products have leached significantly into groundwater and migrated offsite.

In 1990, EPA issued an Administrative Order, RCRA III-036-CA, to Genicom Corporation. Pursuant to a sale agreement between Genicom and GE, GE has been performing the work required under the Order on behalf of Genicom. In 1997, as a result of the Phase II RFI (required by the Order), GE installed and began operating an interim pump-and-treat system to stabilize the plume.

Between 1995 and 1999, GE conducted a RCRA Part B permitted closure of five SWMUs: two recirculation impoundments were closed by removing the structures and contents, backfilling the depressions with clean soil, and installing a RCRA cap to contain and prevent further exposure to any residual contamination in soil.

On December 22, 2008, as a final remedy, EPA made a corrective action determination of complete with institutional controls for Facility soils, given the current and anticipated future land use. For Facility groundwater, EPA made a decision to expand the interim pump-and-treat system by adding a recovery well, and to implement institutional controls to prevent consumptive use of groundwater while it is being cleaned up.

Current Site Status: EPA is the lead agency that provides oversight of RCRA Corrective Action activities at the SWM site in Waynesboro, VA. However, VADEQ is the lead agency responsible for oversight of post-closure requirements for the two closed impoundments within the Facility. After Genicom filed for bankruptcy under Chapter 11 of the U.S. Bankruptcy Code in March 2000, the facility's RCRA Post-closure Permit for the two recirculation impoundments was allowed to expire.

SWM leases portions of the Facility to tenants for light manufacturing, warehousing and distribution. The warehouse area in the main building is used to store supplies from various tenants such as medical glass, A/C coolers, furniture, wiring and packaging. Current tenants include Killer B Motorsports, PPI-Time Zero, 1-800-Radiator, J Goddin & Associates, Owens Corning Basement Finishing System, and Paragon Solutions.

The historical plume has migrated offsite into former Mr. Shifflet's property, which was split and sold to Mr. Lambert and Mr. Ross who continue to use it for cattle farming. Groundwater ICs apply to the entire footprint of the plume on and off site, and the new owners continue to provide access to their properties for groundwater monitoring.

Long-term Stewardship Site Visit: On June 1, 2016, EPA conducted a long-term stewardship site visit with Facility representatives and its contractors to discuss and assess the status of the implemented remedies at the site. The attendees were:

Name	Organization	Email Address	Phone No.
John Hopkins	EPA Region 3	hopkins.john@epa.gov	215-814-3437
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Camela Mitchell	Solutions Management	cam.mitchell@reologistics.com	Not Available
Scott Shaw	Tetra Tech	scott.shaw@tetrattech.com	Not Available
Larry Worley	Tetra Tech	lworley1@verizon.net	Not Available

Institutional Controls (ICs) Status:

Deed Notice: EPA obtained a copy of the Deed Notices and updated our SWM Facility webpage to include these documents. The Deed Notice requires the following: 1) use restriction of the two closed RCRA impoundments; 2) land use restriction of the property to commercial/industrial; 3) restricts use of the property in a way which interferes with or adversely affects Hazardous Waste Management Units or Ground Water Treatment Systems.

There were no residential structures or residential uses of the property at the time of the visit. The RCRA cap area was unused and the Groundwater Treatment System remains unaffected by ongoing operations at the Facility. EPA contacted the Virginia Department of Health to confirm no new municipal or private wells have been installed and that the groundwater well exclusion area notice has been filed as of August 17, 2012. Tetra Tech is currently drafting the updated groundwater exclusion area.

Agreement and Covenant Not To Sue Solutions Way Management (PPA): SWM is required to submit semi-annual progress reports describing the status of implementation of monthly RCRA cap inspections, maintenance of grass covering RCRA cap and maintenance of fencing surrounding the RCRA cap. The last progress report was received on May 18, 2016.

Prior to the initiation of any construction activity, including any significant disturbance of soil, SWM must submit to EPA a notification and work plan of such activity. At the time of the site visit, there were no site development plans for construction anticipated.

Engineering Controls (ECs) Status:

RCRA Cap: The RCRA cap covering the two closed recirculation impoundments appeared to be in good condition. Grass was covering the area and there were no signs of plants with roots greater than 4" that may penetrate the cap.

Access Controls: The fence surrounding the closed impoundment area was intact with appropriate hazard signage.

Groundwater Treatment System: The system was operating at the time of the site visit, pumping at a rate of ~190 gal/min from two extraction wells. Phosphate is added to extracted groundwater to help prevent iron from precipitating out and clogging the air stripper. Mr. Worley, operator of the treatment system, presented his daily logs with flow rates, operation time and groundwater parameters. Both extraction wells, MW-51B and North Well 2, were in good condition. Facility representatives mentioned all monitoring wells on-site were intact as well.

Financial Assurance: Financial Assurance is no longer required at the Facility. In February 1999, VADEQ issued a RCRA Post-Closure Permit requiring Genicom to obtain a financial assurance bond for long-term post-closure care of the recirculation impoundments. After Genicom filed for bankruptcy in 2000, SWM assumed limited responsibility to perform periodic maintenance of the impoundments pursuant to the Covenant. In 2003, VADEQ, in order to provide for long-term post-closure care of the impoundments, executed on the financial assurance bond previously provided by Genicom. By executing on the bond, VADEQ assumed the responsibility to oversee long-term post-closure care of the closed impoundments, and provides an appropriate portion of the bond money to support GE's activities to maintain and operate the closed impoundments and groundwater treatment system as well as to implement ICs in the remedy.

Mapping: The EPA Facility website figures are accurate and includes a geospatial PDF showing the SWM site boundary. The map was field-verified and no issues were noted. Also, the geospatial PDF will be updated with a boundary of the RCRA cap.

Follow-up Activities: There are no follow up activities or recommendations from EPA.

Conclusion: No major EC/IC deficiencies were identified. The current EC/IC have been implemented and are functional/maintained. EPA intends to inform the local community awareness of the elements of the remedy by providing the deed notice and updated geospatial mapped property boundary and RCRA cap on our public website. EPA will continue to review semi-annual progress and compliance reports.

Attachments:

Picture 1: Closed Surface Impoundment and RCRA cap w/ signs

Picture 2: Closed Surface Impoundment and RCRA cap

Picture 3: Extraction Well - EXWP

Picture 4: Picture 4: Extraction Well – North Well 2

Picture 5: Dual Phase Extraction System

Picture 6: Dual Phase Extraction System Indicators and Flow Meters

Picture 7: Air Stripper

Picture 8: Warehouse area

Figure 1: Aerial Map of Solutions Way Management

Appendix A: Deed Notices



Picture 1: Closed Surface Impoundment and RCRA cap w/ signs



Picture 2: Closed Surface Impoundment and RCRA cap



Picture 3: Extraction Well - EXWP



Picture 4: Extraction Well – North Well 2



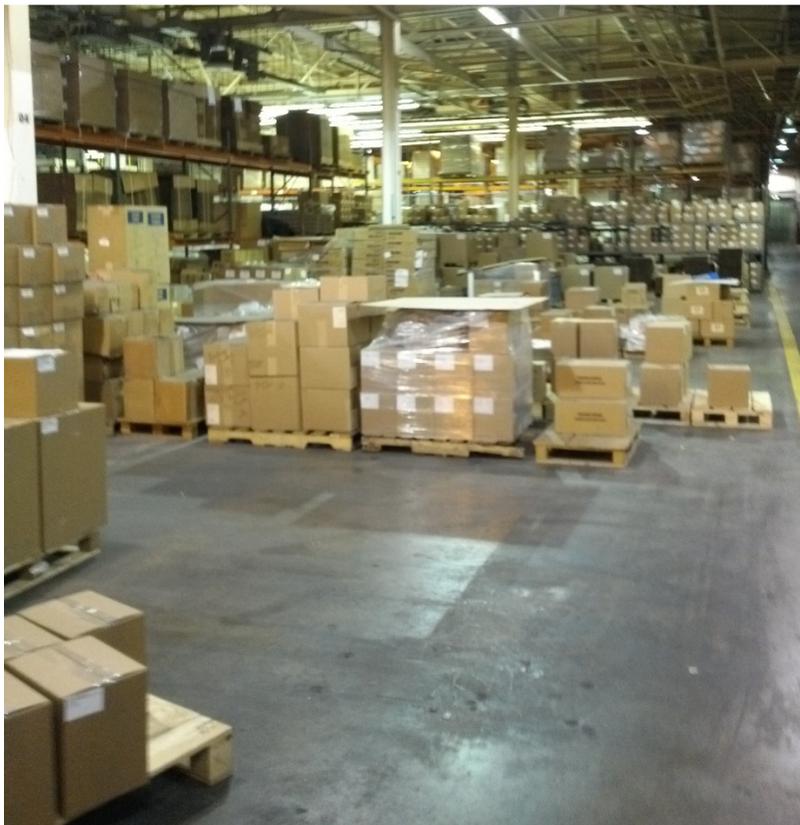
Picture 5: Dual Phase Extraction System



Picture 6: Dual Phase Extraction System Indicators and Flow Meters



Picture 7: Air Stripper



Picture 8: Warehouse area

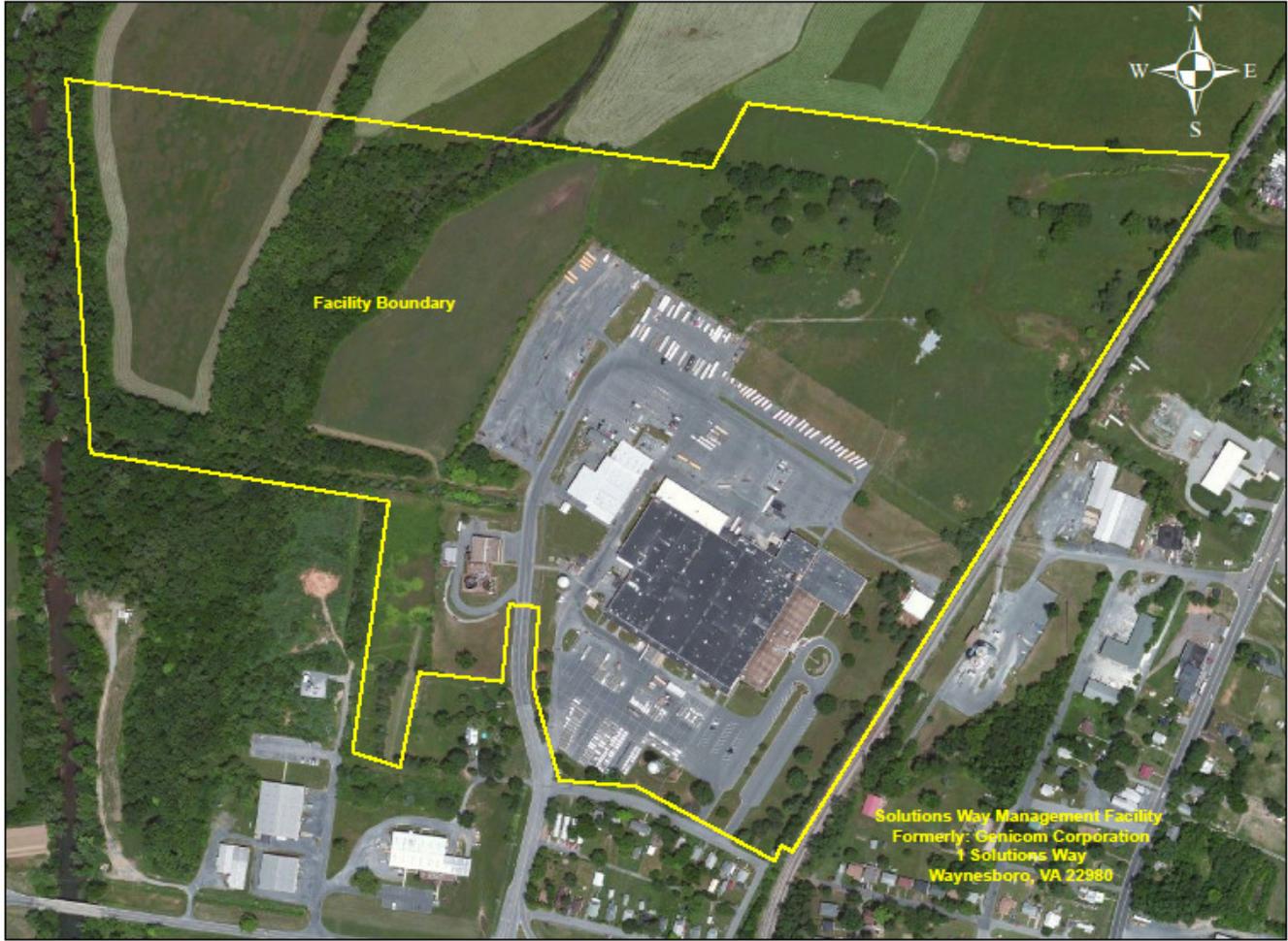


Figure 1: Aerial of Solutions Way Management