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Long-Term Stewardship Assessment Report

Firestone Fiber

EPA ID #: VAD003112588

Hopewell, Virginia 23860

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<u>Introduction:</u> 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.

<u>Site Background</u>: The subject property includes two parcels of land: the AlliedSignal site and the Hadson Power site.

Former AlliedSignal:

Firestone operated a polyester plant located at 105 Winston Churchill Drive, Hopewell, Virginia from 1973 to 1995 on a 37-acre parcel. In 1995, the property was sold to AlliedSignal Inc. The Purchase Agreement held Firestone responsible for any obligations and liabilities resulting from environmental conditions present on the Property on or before 1995.

Also in 1995, Firestone leased back a small area called the F-62 process area, which it continued to operate through approximately June 1999. AlliedSignal owned and operated the plant from 1995 to 2000, when AlliedSignal merged with Honeywell and plant operations discontinued.

Former Hadson Power:

The Hadson Power property, an approximately 13-acre parcel, was formerly part of the Firestone polyester plant detailed above. It is located immediately north of the former AlliedSignal property. Firestone sold this parcel to Hadson Power in 1990, who constructed a co-generation facility. In December 2000, Dominion Virginia Power purchased the Hadson Power property. In 2012, the northern portion of the AlliedSignal property, approximately 14 of the 37 acres, was sold to Dominion Virginia Power.

Firestone Fiber completed Site investigations under the Facility Lead Agreement. The Final decision was signed by EPA on July 1, 2006 which required groundwater monitoring until Maximum

Contaminant Levels (MCLs) are achieved thru natural attenuation. EPA also requires Firestone to restrict groundwater use at the facility thru institutional controls.

<u>Current Site Status:</u> The Firestone plant is not operating at this time. A security fence borders the property with a gate at the main entrance, which is closed when the Facility is unoccupied. Dominion uses the northern part of the property to store and transport wood pellets needed for fuel at its cogeneration plant.

<u>Long-term Stewardship Site Visit:</u> On August 9, 2016, EPA conducted a long-term stewardship site visit with a Firestone Fiber contractor and Dominion Virginia Power representatives to inspect some of the monitoring wells and discuss and assess the status of the remedy implementation at the site. The attendees were:

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Institutional Controls (ICs) Status:

Declaration of Covenants and Restrictions (DCR): This DCR is the method for implementing institutional controls required as a condition of the Final Decision and Statement of Basis. The following ICs apply to the Former AlliedSignal parcel, shown in Figure 1:

- 1) Any use of or activity on the property that would interfere with or adversely affect the integrity, effectiveness or permanence of the Final remedy is prohibited. i.e. the installation of production or other wells on the property and the initiation or conduct of construction or other activities that would adversely affect groundwater monitoring wells on the property.
- 2) No portion of the Property shall be used or occupied, either temporarily or permanently, for any residential use of any kind or nature.

Firestone conducts annual groundwater sampling and quarterly progress reports, which describes work performed and to be performed. There is minimal activity at the southern portion of the property, since the Firestone plant is no longer operating. The current use of Dominion's co-generation facility does not inhibit groundwater monitoring or any part of the Final Remedy. All potable and process water comes from the City of Hopewell's public water supply. Also, no residential structures were observed on the Former AlliedSignal parcel at the time of the site visit. Dominion Power and Firestone are currently in compliance with ICs specified in the DCR. A copy of the DCR can be found here.

Groundwater Monitoring Network:

The Final Remedy consists of monitored natural attenuation (MNA) in groundwater. The monitoring network consists of 10 wells; 7 wells on Firestone's property and 3 wells on Dominion's property.

Groundwater is sampled annually for volatile organic compounds (VOCs), dissolved gasses, 1,4-dioxane and other parameters to help evaluate MNA conditions. Most monitoring wells are surrounded by protective ballard posts that help identify the location of wells. All monitoring wells casings were in good condition with locks prohibiting unwarranted access. For location of monitoring wells, see Figure 2.

Mapping: The EPA Facility website figure is accurate and includes the Former AlliedSignal parcel. A Google Earth interactive embedded map will be added to EPA's corrective action webpage for this Facility. For now, it can be found here. This interactive map displays the Former AlliedSignal boundary and an approximate location of the groundwater plume.

<u>Financial Assurance:</u> Financial assurance is required for groundwater monitoring, closure and post-closure care at the Facility.

<u>Conclusions and Recommendations:</u> No EC/IC deficiencies were identified. EPA has determined that the remedy EC/ICs have been and are being implemented. EPA recommends that Firestone:

- 1. Include historical trend graphs for exceeding constituents at monitoring wells ASMW-01R, ASMW-02 and ASMW-03 in future groundwater reports.
- 2. Include concentration contours on a site map for exceeding constituents in future groundwater reports.

Attachments:

Picture 1: ASMW-01R

Picture 2: ASMW-02

Picture 3: ASMW-03

Picture 4: ASMW-04

Picture 5: ASMW-05A

Picture 6: ASMW-06

Figure 3: ASMW-07

Picture 7: HPMW-01

Picture 8: HPMW-02

Picture 9: HPMW-03

Picture 10: HPMW-04

Figure 1: Aerial Map of Firestone Fiber and Dominion Hopewell Power Station with Well Locations

Figure 2: Former AlliedSignal Parcel Boundary

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Picture 1: ASMW-01R Picture 2: ASMW-02





Picture 3: ASMW-03 Picture 4: ASMW-05A





Picture 5: ASMW-06 Picture 6: ASMW-07





Picture 7: HPMW-01 Picture 8: HPMW-02





Picture 9: HPMW-03 Picture 10: HPMW-04

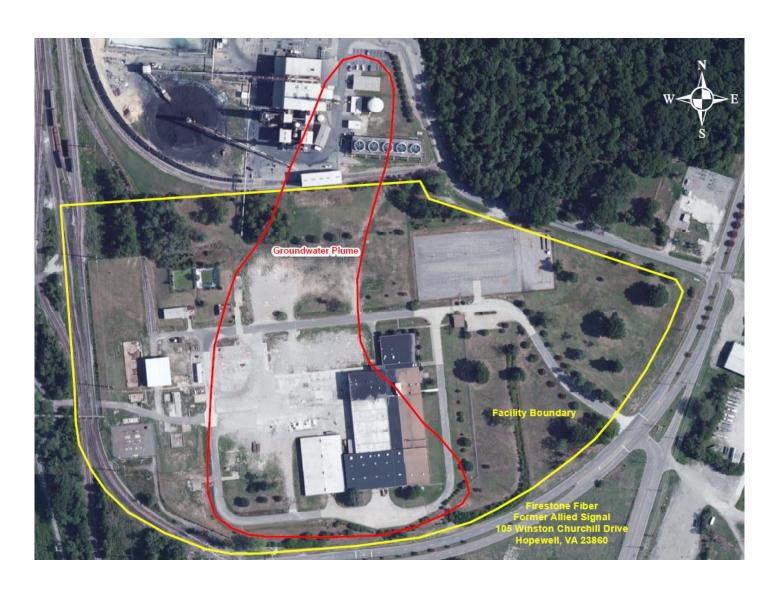


Figure 1: Former AlliedSignal Parcel Boundary



Figure 2: Aerial Map of Firestone Fiber and Dominion Hopewell Power Station with Well Locations