



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 1105, Richmond, Virginia 23218
www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-400
1-800-592-5482

August 31, 2016

Mr. Joel Verplank
VP Family Holdings, LLC
14430 Enterprise Road.
Abingdon, Virginia 24210

VIA ELECTRONIC MAIL

RE: **Long Term Stewardship Report**
Sterling Hardware, LLC
EPA ID VAD000020115

Dear Mr. Verplank:

The Department of Environmental Quality, Office of Remediation Programs (Department) has prepared the attached report following the Long Term Stewardship inspection performed on July 26, 2016 at the Sterling Hardware facility located in Abingdon, Virginia. The inspection found no outstanding items with compliance of engineering controls. However, DEQ observed that the post closure care monitoring wells remain on site. The Facility may proceed with abandonment of all monitoring wells in accordance with the procedures attached to this letter.

You may contact me to discuss any questions. I can be reached at 804-698-4218 or by email at tara.mason@deq.virginia.gov

Respectfully,

A handwritten signature in blue ink that reads 'Tara D. Mason'.

Tara D. Mason
Corrective Action Project Manager

cc: Brett Fisher, DEQ-CO
Cassie McGoldrick, EPA Region III (3LC50)
Dan Manweiler, DEQ-SWRO

Attachment



Long-Term Stewardship Assessment Report
Sterling Hardware, LLC
EPA ID VAD000020115

Prepared by: Tara Mason

Date: August 31, 2016

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 observed. 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 two fold, 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 Sterling Hardware, LLC Company facility is located in Abingdon, Washington County, Virginia, near the intersection of State Routes 704 and 879. The site comprises approximately 4.9 acres of land and is improved with a process building, paved parking lot, and landscaped areas. The site is bound to the north by Tri-Tube Industries, to the east by State Route 704, to the south by State Route 879, and to the west by open, undeveloped land.

The site was previously owned and operated by Sterling Casket Hardware Company from since 1963 to 2011 when it was sold to new owners VP Family Holdings, LLC who continued to operate as Sterling Hardware, LLC (Sterling). Sterling uses the site to manufacture casket hardware. On-site activities include molding, casting, electroplating, painting, and assembly of casket hardware parts. Although lead casting was performed in the past, only zinc casting is currently performed. Sterling currently performs zinc, nickel and cyanide-based (copper and bronze) plating. The process building houses a machine shop, a casket hardware molding room, a shipping warehouse, a painting room, a flammable chemical storage room, a finishing area, several hardware assembly areas, and an electroplating process area.

Several hazardous waste surface impoundments at the facility were closed with wastes in place on May 31, 1989. The Virginia Department of Environmental Quality (VDEQ) and Sterling Casket Hardware entered into a Consent Order (CO) for post-closure care of the closed impoundments on September 30, 1994 and a post-closure permit was never required. The CO required groundwater monitoring and maintenance of the cap covering the impoundments. A



Deed Notice with survey plat was recorded at the Washington County Courthouse. The notice and survey plat identified the location and restricted the use of the hazardous waste surface impoundments closed with waste in place as a landfill. A new Consent Order, effective September 1, 2011, updated and carried post closure care (PCC) and financial assurance (FA) requirements forward to the new owner and new operator of the former Sterling Casket Hardware Co for the remaining 8 years of the PCC period. The DEQ Office of Remediation Programs (ORP) evaluated the termination of post closure care request submitted by VP Family Holdings, LLC on June 12, 2013. The Department agreed that the early termination of the post closure period could be considered once all other requirements of the consent order and post closure care plan had been met. On October 11, 2013, a fully executed Uniform Environmental Covenants Act (UECA) agreement was recorded in the Washington County, Virginia Circuit Court. This document perpetuates activity and use limitations of the property. Therefore, the requirements of the post closure care plan were determined to be satisfied and the 2011 Order was terminated on March 5, 2014. The original order issued in 1994 was not terminated at the time of the sale due to questions of financial assurance; however was officially terminated on September 17, 2014.

Current Site Status: The Virginia Department of Environmental Quality (DEQ) is the lead agency that provides oversight of RCRA Corrective Action activities at the Sterling Casket site located in Abingdon, VA. The final remedy states that no further actions to clean up soil or groundwater are necessary, given current and reasonably anticipated future land use. However, the final remedy also requires the facility to maintain institutional and engineering controls because waste with hazardous substances will remain in four closed surface impoundments.

Long-term Stewardship Site Visit: On July 26, 2016, DEQ conducted a long-term stewardship site visit with a Sterling Hardware employee to discuss and assess the status of the implemented remedies at the site. The attendees were:

Name	Organization	Email Address	Phone No.
Tara Mason	VADEQ – Central	tara.mason@deq.virginia.gov	804-698-4218
Ashby Scott	VADEQ – Central	ashby.scott@deq.virginia.gov	804-698-4467
Justen Dick	VADEQ – SWRO	justen.dick@deq.virginia.gov	276-676-4860
William Widener	Sterling Hardware	NA	276-628-7153



Institutional Controls (ICs):

Groundwater: There are no groundwater controls on the property. However, groundwater monitoring wells were observed on the property. Since no ongoing monitoring requirements exist as part of the remedy, the Facility should proceed with abandonment of the existing wells in accordance with the attached well abandonment procedures.

Residential Use: The parcel is used for commercial/industrial purposes only as recorded on October 11, 2013 in the UECA covenant. No residential areas, playgrounds, child care centers, or public garden spaces have been constructed within Facility boundaries.

Excavation: The property within the landfill boundary cannot be developed in any way which could minimize the integrity and effectiveness of the landfill cover.

Informational and Proprietary Controls: Four surface impoundments were closed with waste in place in 1994. In addition to the UECA, there is a Deed Notice in place with the Washington County Circuit Clerk's Office identifying the location of the Facility's closed landfill. The restrictions limit future development/disturbance on impoundment areas and maintenance of the landfill cap.

Engineering Controls (ECs):

Access Controls: There are two locked security fences surrounding the two landfills onsite. The security fence was intact and undamaged. Adequate signage was placed around the fence.

Financial Assurance: Financial Assurance is not required at the Facility.

Reporting Requirements/Compliance: Beginning with the 3rd January following the recordation of the UECA, the Facility is required to submit to the Agency written documentation stating whether or not the activity and use limitations of the environmental covenant are being observed. The documentation is to be signed by a qualified and certified professional engineer who has inspected compliance with the environmental covenant.

The Department received the documentation during the site visit on July 26, 2016.

Mapping: The EPA Facility website figures are accurate and include a geospatial PDF showing the use restriction boundary. The map was field-verified and no issues were noted.

Follow-up Activities: The post closure care monitoring wells remain onsite. Since the post closure care monitoring and associated Consent Order has been terminated and there are no additional ongoing monitoring requirements, the monitoring wells should be abandoned in accordance with the attached procedures.



Conclusion: The engineering controls selected are implemented and remain intact and undamaged. Also, no EC/IC deficiencies have been identified. The current EC/ICs have been implemented and are functional and maintained as required.

Please provide the Department with documentation of well abandonment when completed. Please let me know if you have any questions.

VDEQ Long Term Stewardship Inspection Site Photos
Sterling Hardware Company LLC
Photos by: Tara D. Mason
July 26, 2016

Hazardous Area 1 – Facing SW on southeastern property boundary



Hazardous Area 1 – Facing West from parking lot.



Hazardous Area 2 – Facing Northeast



Hazardous Area 3 Facing North Northeast





Well Abandonment Procedures

All wells that are to be abandoned shall be plugged and abandoned in general accordance with 12VAC 5-630-420 and 12VAC 5-630-450. Chlorination of each well is not required. An effort to remove the well casing and associated materials shall be made at each well prior to abandonment. A report including methods and certification shall be submitted to the Department within thirty (30) days following the completion of abandonment. The Permittee may propose alternate methods for well abandonment and must obtain approval from the Department prior to implementation.

Remedies:

1. A Deed Notice in place with the Washington County Circuit Court Clerk's Office, Deed Book 844, Page 767-768, identifies the location of the hazardous waste surface impoundments closed with waste in-place as a landfill. These areas shall not be disturbed and the existing caps shall be maintained.
2. Future land use on the facility property will be restricted to industrial or commercial use. (no residential use, no playgrounds, no child care centers, or public garden space)
3. No construction at the Facility shall be undertaken without prior consultation with, and written approval from, the VDEQ and the EPA.
4. All soil removed from within the Facility's boundaries shall be treated and if found to be RCRA hazardous waste, shall be treated and disposed of as such.
5. All workers involved in disturbing the soils by digging at the Facility shall be properly trained and provided with proper personal protective equipment before they engage in any such activity.

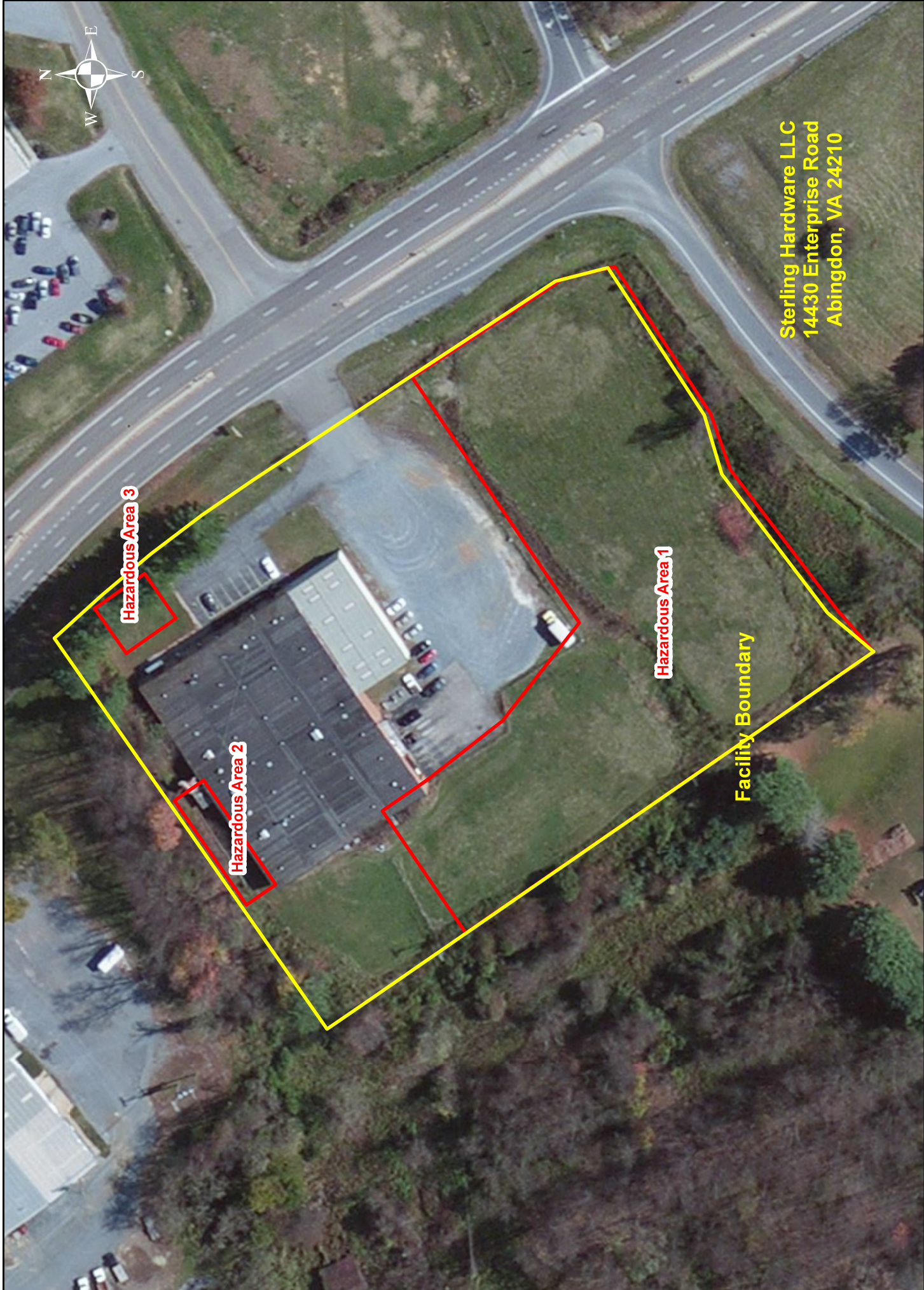
Observed by: Tara Mason, DEQ Co
Ashby Scott, DEQ Co

<u>IC Review and Inspection Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the CA remedy been fully implemented in accordance with any applicable schedule?	✓		
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	✓		
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?	✓		
• Are the ICs sufficiently meeting the risk goals and applicable standards specified in the CA remedy?	✓		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	✓		
• Are the ICs suitable for the period/length of time which the controls are intended to be used as specified in the CA remedy?	✓		
• Are the ICs being maintained as required by the CA remedy in order to ensure that the controls remain effective?	✓		
• Are additional ICs necessary to achieve the intended goals of the CA remedy?	✓		
• Are modifications to the ICs needed?		✓	

<u>IC Review and Inspection Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
<u>EC Review and Inspection Questions:</u>			
• Have the ECs specified in the CA remedy been fully implemented and constructed in accordance with any applicable plans and schedule?	✓		
• Are the ECs fully intact? Any damage visible? Have any repairs been necessary?	✓		Small inactive grounding berm w/ S, facility aware
• Do the ECs provide control for the entire extent of contamination (lateral and vertical)?	✓		
• Are the ECs effective at reducing contaminant migration? Is data available to provide supporting evidence?	✓		
• Are the ECs eliminating or mitigating exposures to all potential receptors?	✓		
• Are the ECs sufficiently meeting the risk goals and applicable standards specified in the CA remedy?	✓		
• Are the ECs effective and reliable for the activities (current and future) and climatic conditions at the property to which the controls are applied?	✓		
• Are the ECs reliable during the period/length of time which the controls are used to achieve and maintain applicable standards specified in the CA remedy?	✓		
• Are the ECs being monitored and maintained as required by the O&M plan or agreement developed in accordance with the CA remedy in order to ensure that the controls remain effective?	✓		
• Are additional ECs necessary to achieve the intended goals of the CA remedy?	✓		
• Are modifications to the ECs needed?	✓		

Notes:

William Widener, Site Superin
Justin Dick, SWRO DEW
Ashby Scotty → DEQ CO
Tam Mason
- Follow-up - Post close care monitoring wells should be abandoned since no ongoing gw monitoring is required.



Sterling Hardware LLC
14430 Enterprise Road
Abingdon, VA 24210

Hazardous Area 3

Hazardous Area 2

Hazardous Area 1

Facility Boundary

