



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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March 30, 2017

Mr. Garry L. Gray
Milford Investment Properties, LLC
16440 Industrial Drive
Milford, Virginia 22514

VIA ELECTRONIC MAIL

RE: **Long Term Stewardship Report**
Former KLI site
EPA ID VAD052356623

Dear Mr. Gray:

The Department of Environmental Quality, Office of Remediation Programs (Department) has prepared the attached report following the Long Term Stewardship inspection performed on March 29, 2017 at the KLI site located in Milford, Virginia. The inspection found no outstanding items with compliance of engineering and institutional controls.

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: Bill Webb, Milford Investment Properties, LLC
Brett Fisher, DEQ-CO
Cassie McGoldrick, EPA Region III (3LC50)
Richard Doucette, DEQ-NRO

Attachment



Long-Term Stewardship Assessment Report
KLI Site
EPA ID VAD052356623

Prepared by: Tara Mason

Date: March 30, 2017

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 facility is located south of the town of Milford in Caroline County, Virginia. The facility site consists of a 21.33-acre parcel bounded by Industrial Drive (Route 640) to the west, Route 773 to the south, Hoover Wood Products to the east, and Jones Chemical to the south.

During approximately 1968 to 1988, the following three businesses were operated at the facility: Keller Extrusions of Virginia, Inc., Keller Building Products of Virginia, Inc., and Keller Ladders of Virginia. Management of wastewater prior to the construction of a surface impoundment in 1977 is unclear. The property contains a drainage ditch located next to the surface impoundment and parallel to Route 773. The drainage ditch contains two drains that are constructed below Route 773, which discharge into neighboring wetlands.

EPA Region III completed a RCRA Facility Assessment (RFA) in January 1989 which identified 13 Solid Waste Management Units (SWMUs) and 2 Areas of Concern (AOCs).

On May 27, 2006, a Post-Closure Care Permit (Permit) with the RCRA Corrective Action (CA) Module and Attachments was issued to KLI, Inc., by the Virginia Department of Environmental Quality (DEQ). The Permit required post-closure care of a hazardous waste surface impoundment, groundwater monitoring, and site-wide CA. In January 2007 Milford Investment Properties, LLC, bought the KLI, Inc. property and assumed responsibility for the RCRA CA.



A RCRA Facility Investigation (RFI) was conducted between 2001 and 2009 and determined to be complete on January 13, 2011.

Current Site Status: In December 2012, the facility's Hazardous Waste Management Permit was modified to incorporate a final remedy detailed in a Statement of Basis developed by the Virginia Department of Environmental Quality (DEQ), which includes groundwater monitoring and institutional controls. The Permit became effective on December 21, 2012 and represents Remedy Selection and Remedy Construction Complete determinations in accordance with the Corrective Action process.

The final remedy requires the facility to maintain a groundwater monitoring program and to develop and maintain groundwater use restrictions known as institutional controls that will prevent current and potential future exposure to groundwater contamination and assure that the groundwater use does not change until the groundwater objectives are met.

In August 2015, the Facility demonstrated stable groundwater conditions in support of terminating Post Closure Care. A revised CMI plan was approved to implement Corrective Action groundwater monitoring outside of the Permit. The facility recorded a Uniform Environmental Covenants Act (UECA) covenant on March 21, 2016 which requires compliance with institutional controls and compliance with the approved CMI plan. The Hazardous Waste Management Permit was allowed to expire on May 27, 2016.

Long-term Stewardship Site Visit: On March 29, 2017, DEQ conducted a long-term stewardship site visit 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
Garry Gray	Milford Investment Properties, LLC	ggray777@verizon.net	804-633-6800

Institutional Controls (ICs):

Groundwater: Ground water beneath the Property shall not be extracted or used for potable or non-potable purposes, except for ground water monitoring from monitoring wells. The facility is currently monitoring one well annually in accordance with the Facility’s Corrective Measures Implementation Plan.

Informational and Proprietary Controls: One surface impoundment (SWMU #10) was closed with waste in place in June 1989. The capped hazardous waste surface impoundment described in the "Notification of Hazardous Waste Activity" for the Property and filed in Deed Book 333, Page 019, and described in the UECA recorded on March 21, 2016 shall be maintained and shall



not be disturbed. The cap shall be inspected on a regular basis and the inspection should include examination of the cover integrity.

Engineering Controls (ECs):

Access Controls: The surface impoundment is capped and surrounded by a locked gate and fence.

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

Reporting Requirements/Compliance: Beginning with March 1, 2017, and every five years thereafter, the Facility is required to submit to the Agency and holder 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 on March 22, 2017.

Mapping: The EPA Facility website figure is accurate and includes a geospatial PDF showing the use restriction boundaries. The map was field-verified and no issues were noted.

Follow-up Activities: No follow up activities are required.

Conclusion: The engineering and institutional controls selected are implemented and remain intact and undamaged. No EC/IC deficiencies have been identified.

VDEQ Long Term Stewardship Inspection Aerial Photo
KLI Site – Milford, Virginia



VDEQ Long Term Stewardship Inspection Site Photos

KLI Site

Photos by: Tara D. Mason

March 29, 2017

Facing East – Current Site Use - Equipment Staging on concrete building pad



Closed Impoundment (SWMU #10) – Facing North from South Property Boundary





VADEQ - Long Term Stewardship Checklist
 KLI site, Milford, VA
 VAD052356623

March 29, 2017

Remedies:

1. Ground water beneath the Property shall not be extracted or used for potable or non-potable purposes, except for ground water monitoring from monitoring wells.
2. The capped hazardous waste surface impoundment described in the "Notification of Hazardous Waste Activity" for the Property and filed in Deed Book 333, Page 019...shall be maintained and shall not be disturbed. The cap shall be inspected on a regular basis and the inspection should include examination of the cover integrity.
3. Upon transfer of the Property, the groundwater monitoring wells not in use for remedy demonstration shall be properly abandoned in accordance with all applicable Federal and State requirements. The then current Owner shall within one (1) month of property transfer submit to the Agency and Holder written documentation of the well abandonment.

Observed by: Tara Mason, DEQ CO
Garry Gray - Milford Investment

<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?	NO	✓	
• Are modifications to the ICs needed?		✓	
<u>EC Review and Inspection Questions:</u>			
• Have the ECs specified in the CA remedy been fully implemented and constructed in accordance with any	✓		



VADEQ - Long Term Stewardship Checklist
 KLI site, Milford, VA
 VAD052356623

<u>IC Review and Inspection Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
applicable plans and schedule?			
• Are the ECs fully intact? Any damage visible? Have any repairs been necessary?	✓		
• 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:

- Groundwater not in use, 1 well currently being monitored for PCE annually.
- Additional monitoring wells remain onsite.
- Site currently being leased as a staging area / concrete pad where former building was.
- No issues identified during site walkover
- Geospatial PDF accurate.