

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

DATE: 08/10/2020

SUBJECT: Former Amsted Industries/Griffin Pipe Products

Thomas & River Roads (Rte. 685), Madison Heights, VA

RCRA ID: VAD000800532

Long-term Stewardship Assessment

FROM: Barbara Smith, Project Manager (3LD10)

TO: Long Term Stewardship File for former Amsted-Griffin Pipe Facility

RCRA Corrective Action Branch 2 (3LD20)

Remedy Review Summary:

EPA's Final Remedy Decision (3/10/2017) is construction complete with controls for the Griffin Pipe Products Company, LLC Facility (Griffin Pipe), located in Madison Heights, Amherst County, VA. The environmental covenant (EC) requires that the integrity of the engineered controls be maintained. The engineered controls consist of a: (1) soil cap over the former 8-acre landfill; and (2) geomembrane cap over a former 0.32-acre stormwater retention pond, downgradient of the landfill. Disturbance of the caps and soil beneath the caps requires prior EPA approval. Also, Facility use is to remain non-residential. EPA has determined that the property is in compliance with EPA's remedy decision. The property is ready for reuse.

Document Review:

The most recent aerial image of the Facility (Google satellite map) shows that the 15-acre property appears unused, and the two capped areas appear undisturbed, with grass covering the capped (former) landfill and foliage on the capped (former) stormwater pond. The Environmental Covenant for the property was recorded in October 2017 and is available on EPA's Fact Sheet for the Facility. Griffin Pipe reported to EPA and VDEQ that the Facility is in compliance with the EC in a letter dated January 25, 2019. Griffin Pipe is listed in the covenant as property Owner/Grantor and Grantee/Holder. Covenant restrictions are summarized in the Table on page 3, below. The cap locations (engineering controls) are shown in the Figure below.

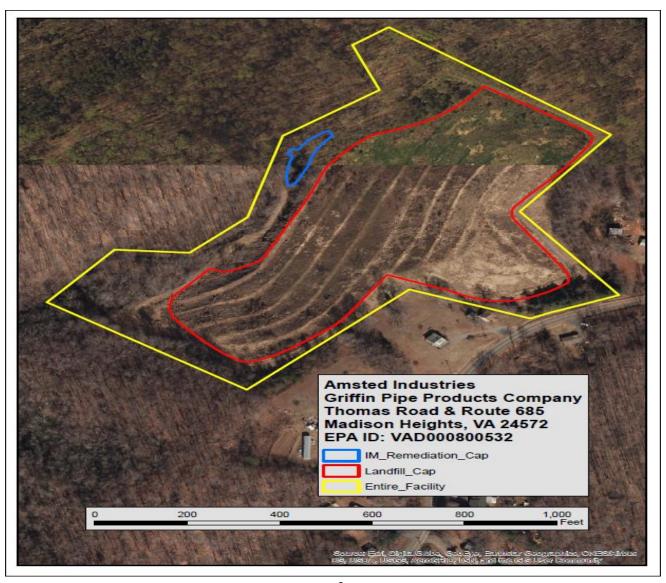
Background:

The Facility consisted of a landfill and two bermed stormwater sediment retention ponds that received runoff from the landfill and drained into adjacent Buck Branch. Beginning in the 1970's, Griffin Pipe disposed of foundry waste from its Lynchburg iron foundry on the Facility property. In 1981, Griffin Pipe purchased the property, also known as the Thomas Landfill, and operated the landfill until 1984.

Griffin Pipe was the only source of waste, both hazardous and non-hazardous, to be received at the landfill. Hazardous waste included bag house dust generated from the foundry, which contained cadmium and lead. By 1989, the landfill was closed and capped under a VADEQ-approved closure plan. In July 2002, EPA issued Griffin Pipe a Consent Order to conduct an RFI and CMS and perform Interim Measures, as needed. The Facility investigated landfill materials, groundwater, stormwater retention pond sediment and Buck Branch sediment and surface water. The investigation found arsenic, cadmium and lead above RBC industrial levels in the landfill material and metals found in the former stormwater ponds were found at levels that posed a risk to terrestrial, benthic and aquatic organisms. EPA proposed that the stormwater ponds be capped as an IM. The eastern pond only exceeded the RBC industrial level for lead. In October 2016, Griffin Pipe installed a geomembrane cap over the sediments in the eastern detention pond to cover/control exposure to the sediment.

Documents Reviewed:

EPA Facility Fact Sheet, which includes EPA Statement of Basis and FDRTC, Environmental Covenant (11/06/2017), Environmental Indicator Forms, and Facility boundary and Covenant areas (mapped 10/29/2019); Google Earth ProTM images; EPA's RCRAInfo database; and Griffin Pipe's EC Compliance Letter, dated January 25, 2019.



Institutional Control/Engineering Control Corrective Action Remedy Summary

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Facility Name	Amsted Industries-Griffin Pipe Products Co., LLC.			
Address	Thomas Road, Madison Heights, Amherst Co., VA			
EPA ID Number	VAD000800532			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use		X		
Residential Use	×		Entire Facility (15-acres) (AUL#3).	Commercial or Industrial use only unless demonstrated to EPA that other use will not pose threat to human health/env. & EPA provides written approval.
Excavation	x		Two capped areas: Former landfill area (AUL#1) & former eastern sediment retention pond (AUL#2).	Maintain cap integrity & no disturbance of soil beneath caps, according to EPA approved O&M Plan.
Vapor Intrusion		x		
Capped Area(s)	x		Two capped areas: Former landfill area (AUL#1) & former eastern sediment retention pond (AUL#2).	Maintain cap integrity & no disturbance of soil beneath caps, according to EPA approved O&M Plan.
Other Engineering Controls		x		
Other Restrictions	×		Entire Facility (15-acres).	Compliance Reporting: every 5 yrs., starting Jan. 2019. Notify EPA & Holder of property transfer, use change, non-compliance with EC, & notice of bldg. permits.