

EPA Region III / State RCRA Correction Action Workshop

Bedford Springs, PA

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RCRA Facility Assessments Lessons Learned Presentation

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Outline

- Health and Safety Tip
- Lessons Learned with Examples
 - Pennsylvania Sites
 - Virginia Sites
- Thoughts and Discussion
- Conclusions
- Questions

Health and Safety Tip

- Emergency evacuation route

Lessons Learned #1

Engage regional DEQ/DEP offices

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- Helps incorporate knowledgeable local inspector
- Helps to identify available files
- Helps provide contact information if needed
- Helps relationship with Facility

Example Facility

- Rehrig International Inc.
- Richmond, VA
- VDEQ Piedmont Region



Example Facility

- Rehrig International Inc.
 - Variety of businesses previously occupied the property
 - Most recent was shopping kart manufacturing facility
 - Contact info outdated
 - Minimal files on record
 - Regional VDEQ inspector was able to gather a variety of information
 - Able to finish process effectively

Lessons Learned #2

Thoroughly research ownership /
operator history of facility

Thoroughly research ownership / operator history of facility

- Ensures that all necessary parties are involved in process
- Ensures that all necessary parties are at Site Visit
 - Consultants
 - Current and past owners
 - Inspectors
- Status of a site can change with little documentation
- Some are abandoned
- Some have moved

Example Facility

- Reynolds Aviation Division Facility
- Richmond, VA
- VDEQ Piedmont Region



Example Facility

- Reynolds Aviation Division Facility
 - Multiple property owners and operators
 - Multiple consultants involved
 - All necessary parties attended Site Visit
 - Very productive Site Visit with good information presented
 - Full history discussed, etc.

Lessons Learned #3

Conduct extensive and thorough Site Visit

Lessons Learned #3

- Conduct extensive and thorough Site Visit
 - Don't let facility lead the walk
 - Visit all SWMUs
 - Visit all AOCs
 - Take photos (more on this to come!)

Example Facility

- Edmund Optics, Inc.
- Pennsburg, PA
- PADEP Southeast Region



Example Facility

- Edmund Industrial Optics, Inc.
 - Manufacturers a variety of glass lenses
 - Proprietary glass polishing technique for lenses used on Abrams A-1 Battle Tank sight scopes
 - Facility did not want us in several areas
 - Signed waiver we would not disclose proprietary information
 - Guess what the proprietary technique was?!?!
 - Leaking acetone tank in basement under main hallway of office
 - Abandoned storage tanks found
 - Excessive follow-up work resulted

Lessons Learned #4

Extensive photo log with detailed captions

Extensive Photo Log with detailed captions

- Helps EPA / State review of Site Visit Report
- Valuable for large sites
- Valuable for sites with many SWMUs

Example Facility

- General Electric Transportation Systems
- Erie, PA
- PADEP Northwest Region



Example Facility

- General Electric Transportation Systems
 - Site covers over 350 acres
 - Over 4 million sq. ft. of manufacturing floor
 - Dozens of buildings
 - Large amount of SWMUs, AOCs, ASTs, USTs, etc.
 - Photo Log was very valuable when writing Site Visit Report and filling out EI forms
 - Photo Log was very valuable for EPA / PADEP when reviewing the Site Visit Report and EI Forms

Lessons Learned #5

Detailed Site Location and Layout Map

Detailed Site Location and Layout Map

- Show SWMUs and AOCs
- Have facility provide map if possible
- Get access to electronic files if possible
- Show outfalls, MWs and other such features

Example Facility

- Neville Chemical
- Neville Island, Neville Township, PA
- PADEP Southwest Region



Example Facility

- Neville Chemical Company
 - Large facility, apprx. 70 acres in size
 - Many industrial facilities adjacent to site
 - Residential areas nearby
 - Surface water bodies adjacent to site
 - Developing an accurate and detailed Site Location and Layout Map was crucial is writing a detailed Site Visit Report and filling out EI Forms
 - Site Location and Layout Map very valuable to EPA and PADEP when reviewing Site Visit Report and EI Forms

Lessons Learned #6

Friendly exchange with Facility Reps

Friendly exchange with Facility Reps

- We are not there on an enforcement activity
- Keeps information flowing
- Positive public comment period on administrative record

Example Facility

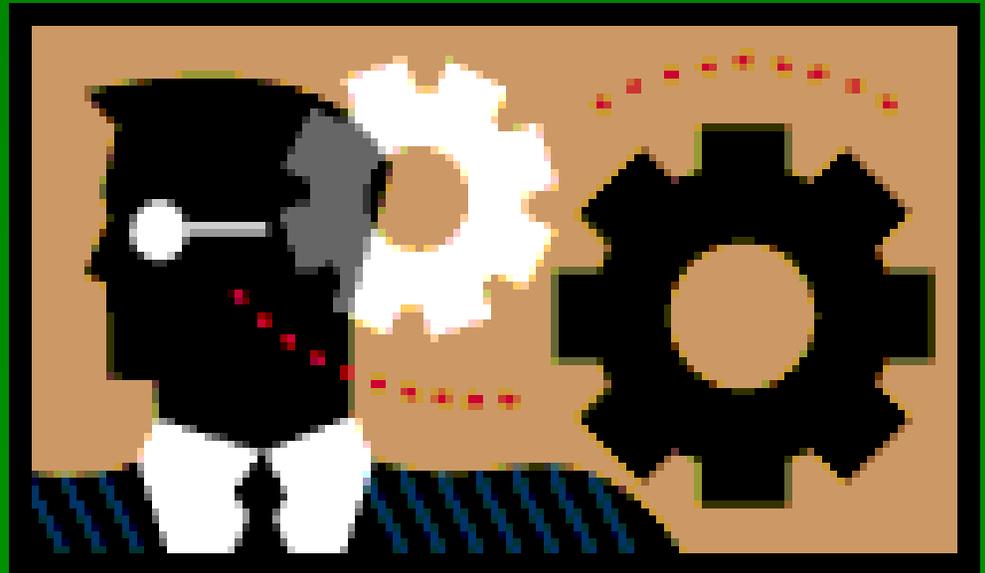
- Blue Ridge Talc and Alta Kitson Farm
- Henry, VA
- VDEQ West Central Region



Example Facility

- Alta Kitson Farm and Blue Ridge Talc
 - Adjacent facilities with confusing history
 - Previous owner(s) deceased
 - Ornery facility representative who did not want to be cooperatives
 - EPA and VDEQ presented the RCRA EI process in a constructive way
 - Positive experience resulted

Thoughts and Discussion



Conclusions



Questions

