



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Secretary of Natural Resources

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November 20, 2014

Mike Saylor
Plant Safety Engineer
Federal Mogul Corporation
300 Industrial Park Drive, SE
Blacksburg, VA 24060-6699

**RE: RCRA Corrective Action Remedy Evaluation
Federal-Mogul Corporation, Blacksburg VA
EPA ID No. VAD054039961**

VIA ELECTRONIC MAIL

Dear Mr. Saylor:

The Virginia Department of Environmental Quality, Office of Remediation Programs (the Department) has completed a RCRA Corrective Action (CA) evaluation for the Federal-Mogul Corporation (Federal-Mogul) facility in Blacksburg, Virginia. The goal of the CA evaluation is to ensure the necessary remedy components have been implemented and to assess the long-term effectiveness of remedies, including engineered controls (EC) and institutional controls (IC), at RCRA CA facilities.

The Department met on-site at the facility with representatives from Federal-Mogul and URS on August 19, 2014 to discuss the status and inspect the elements of the final CA remedy. The final RCRA CA remedy for the site was approved by the Department as part of a class 2 Permit modification on September 18, 2012. The final remedy for the Federal-Mogul facility includes the following major elements:

1. Operation of the groundwater Pump and Treat (P&T) system;
2. Long-term performance monitoring of groundwater;
3. Operation of the Soil Vapor Extraction (SVE) system; and

4. Implementation and maintenance of on-site and off-site ICs and ECs.

Based on the review of available information and on-site inspection, the Department concurs that the final remedy elements have been implemented and maintained at the facility. The existing active remediation systems (P&T and SVE) were functional at the time of the site evaluation and appeared to be properly maintained and monitored in accordance with approved plans. The remediation systems and groundwater are monitored and sampled on a regular basis and associated information and analytical data has been provided to Department through routine report submittals. The provided data indicates that the active remediation systems are effectively removing contaminants from the soil and groundwater to reduce concentrations. In addition Federal-Mogul has implemented the required on-site and off-site ICs and ECs to prevent human health exposure to known soil and groundwater contaminants.

EPA Region 3 has updated their website with relevant information on the facility's RCRA CA activities including copies of pertinent documents. The information for the facility can be found at the web address: <http://www.epa.gov/reg3wcmd/ca/va/webpages/vad054039961.html>

The Department requests that Federal-Mogul provide notification to all individuals on the facility's community mailing list in order to provide the local community an updated status on the elements of the RCRA CA remedy. A copy of this letter should be included with the notification.

Please feel free to contact me if you have any questions or concerns at (804) 698-4045 or ryan.kelly@deq.virginia.gov.

Sincerely,



Ryan J. Kelly
Corrective Action Project Manager
Office of Remediation Programs

cc: Andrea Barbieri, EPA Region III (3LC50)
A. Farahmand, DEQ-BRRO
Mark Bauer, Federal-Mogul Corporation
Kelly Hicks, URS Corporation
Central Office File