

STATEMENT OF BASIS

Virginia Commonwealth University-Oliver Hall
Richmond, Virginia

EPA ID No. VAD 000798652

I. Introduction

This Statement of Basis is for Oliver Hall at the Virginia Commonwealth University (VCU) located in Richmond, Virginia. After reviewing the results of recent site inspections, past environmental practices, historical investigations and remedial activities, the United States Environmental Protection Agency (EPA) believes that no further corrective action is necessary at VCU-Oliver Hall at this time, and is proposing a final decision of Corrective Action Complete Without Controls. This proposal is consistent with current EPA guidance entitled *Final Guidance on Completion of Corrective Action at RCRA Facilities* (February 25, 2003). The purpose of this document is to solicit public comment on the proposal that no further corrective action is required at the facility at this time.

VCU-Oliver Hall is subject to the Corrective Action Program under the Resource Conservation and Recovery Act (RCRA). (For more information on RCRA Corrective Action, please visit the Region III web site at www.epa.gov/reg3wcmd/correctiveaction.htm). The Corrective Action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. Region III is using the administrative procedures found in 40 CFR Part 270 to solicit public comment prior to making its final corrective action decision for VCU – Oliver Hall.

II. Facility Background

VCU is a teaching and research institution with two campuses located in Richmond, Virginia. Oliver Hall is a large multi-story building within VCU's West Campus. The building is situated near other university buildings and on the corner of Main Street and Beech Street, approximately 2 miles to the west of Interstate 95.

Oliver Hall has operated as a hazardous waste storage facility since January 15, 1976. VCU operates a storeroom on the first floor of Oliver Hall, where the hazardous waste storage unit is located. The storeroom is also used to store clean chemical reagents.

Oliver Hall became subject to regulations promulgated under the Resource Conservation and Recovery Act on November 19, 1980. This facility qualified for interim status as a hazardous waste management facility on August 21, 1981.

On September 2, 1983, the Virginia Department of Waste Management (VDWM) requested that VCU submit a Part B application for Oliver Hall. On April 20, 1984 VCU notified VDWM that they would not be seeking a Part B permit. Oliver Hall's interim status was terminated on November 20, 1984. On February 15, 1985, VDWM approved the closure plan. On October 22, 1985, VDWM approved the final closure of Oliver Hall as a treatment, storage, and disposal (TSD) facility.

While Oliver Hall has been closed as a TSD facility, it still maintains its status as a small-quantity generator of hazardous waste. Hazardous wastes are presently stored at the facility but are removed within the required 90-day period.

III. Release History

There have been no known releases of hazardous waste at VCU-Oliver Hall. During the September 1, 2005 site visit, it was confirmed that only one solid waste management unit (SWMU) exists at Oliver Hall, that being the hazardous waste storage facility in Oliver Hall. The hazardous waste storage area is part of a chemical storeroom in Oliver Hall. The dimensions of the storeroom are 22 feet by 24 feet. The hazardous waste storage area dimensions are approximately 6 feet by 22 feet. This area is not physically separated from the rest of the storeroom and no containment devices, other than the room itself, are present. There is a condensate drain located on the clean product side of the room opposite the area used to store the generated wastes. However, that drain has been grouted closed for some time. Access to the storeroom is restricted as it can only be entered through locked double steel doors.

Wastes generated include Waste Flammable Liquid, not otherwise specified (n.o.s.); Waste Poison B Liquid, n.o.s.; and Waste Corrosive Liquid, n.o.s. The generated wastes include both solids and liquids. The volume and type of wastes generated are variable and are dependent on the type of research which is being conducted. The quantities of reagents and other materials being used in the laboratories are kept in small containers, generally four liters or less, and are kept in fume hoods until removal to the hazardous waste storage unit in Oliver Hall, where they are packed into 55-gallon drums for removal.

IV. RCRA Site Visit

On September 1, 2005 an onsite meeting was held to discuss the facility history, locate previously identified SWMUs, verify the results of a file review and gather information concerning the facility's current conditions. Attendees at the meeting included the Virginia Department of Environmental Quality, VCU, EPA, and the United States Army Corps of Engineers. No additional SWMUs or Areas of Concern were identified during the site visit and observations of the hazardous waste storage area were consistent with the closure of Oliver Hall as a treatment, storage, and disposal facility.

V. Conclusion

The September 1, 2005 site visit at VCU-Oliver Hall concludes corrective action at the facility at this time. The hazardous waste storage area does not pose an unacceptable risk to human health or the environment.

VI. Public Participation

EPA is requesting comments from the public on its tentative decision of Corrective Action Complete without Controls. The public comment period will last thirty (30) calendar days from the date that this matter is publicly noticed in a local newspaper (January 18, 2007 to February 20, 2007). Comments should be sent to EPA in writing at the EPA address listed below, and all who comment will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be directed to Mr. William Geiger of the EPA Regional Office at the address below or at (215) 814-3413.

The Administrative Record contains all information considered by EPA when making this proposal. The Administrative Record is available at the following locations:

U.S. Environmental Protection Agency - Region III
1650 Arch Street - 3WC23
Philadelphia, PA 19103-2029
Contact: Mr. William Geiger
Voice: (215) 814-3413
Fax: (215) 814-3113
Hours: Monday - Friday, 8:00 A.M - 5:00 P.M.
E-mail: geiger.william@epa.gov

James Branch Cabell Library
901 Park Avenue
PO Box 842033
Richmond, VA 23284-2033
(804)828-1110

Following the thirty (30) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to this proposal, EPA will seek public comments on the revised proposal.