



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 1105, Richmond, Virginia 23218
www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

September 19, 2016

Ms. Jill Culbertson
Plant EHS Manager
Rubbermaid Commercial Products
125 Apple Valley Road
Winchester, VA 22602

**RE: RCRA Corrective Action Remedy Evaluation
Rubbermaid Commercial Products, Winchester VA
EPA ID No. VAD070360219**

VIA ELECTRONIC MAIL

Dear Jill:

The Virginia Department of Environmental Quality, Office of Remediation Programs (the Department) has completed a RCRA Corrective Action (CA) evaluation for the Rubbermaid Commercial Products (RCP) facility in Winchester, 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 RCP representatives on August 16, 2016 to discuss the status and inspect the elements of the final CA remedy. The final RCRA CA remedy for the site was approved by EPA Region 3 and the Department and incorporated into a Uniform Environmental Covenant (UECA) by the former property owner, G.E. Lighting LLC, on June 27, 2012. The final CA remedy for the RCP facility is detailed in paragraph three (3) of the Environmental Covenant and includes the following major elements:

1. Limited Use Only. The property shall not be used for any residential purposes; and

2. Soil Control. Any soil disturbed or handled on the property must be properly managed and follow specific requirements.

Based on the review of available information and on-site inspection, the Department concurs that the final remedy elements have been implemented and generally maintained at the facility. The property was being utilized for commercial purposes at the time of the site evaluation and RCP personnel had full understanding of the Environmental Covenant conditions including the property use and activity limitations and reporting requirements.

EPA Region 3 maintains their website with relevant information on the facility's RCRA CA activities including copies of pertinent documents and maps. The available information for the facility can be found at the following web address:
<https://www3.epa.gov/reg3wcmd/ca/va/webpages/vad070360219.html>

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: Cassie McGoldrick, EPA, Region III (3LC50)
John Hopkins, EPA Region III (3LC20)
G. Simmerman, DEQ-VRO
Brett Fisher, DEQ-CO
Kisa Baskin, Gary Moore, Newell Rubbermaid
Central Office File