



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY  
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March 13, 2017

Mr. Graham Reid  
Plant Manager  
Kerneos, Inc.  
1316 Priority Lane  
Chesapeake, VA 23324  
757-284-3350

## VIA ELECTRONIC MAIL

RE: **Long Term Stewardship Report**  
**Former JG Wilson – 120 Jefferson Street – Chesapeake, VA**  
EPA ID VAR000000125

Dear Mr. Reid:

The Department of Environmental Quality, Office of Remediation Programs (VDEQ) has prepared the attached report following the Long Term Stewardship inspection performed by the United States Environmental Protection Agency (USEPA) and VDEQ on March 1, 2017 at the Former JG Wilson facility located in Chesapeake, Virginia. The inspection found no outstanding items. However, the current owner wishes to remove the UECA recorded on the property and has submitted a demonstration that the final remedy has been achieved for the site and the UECA is no longer needed. The Department is facilitating the UECA removal process.

You may contact me to discuss any questions. I can be reached at 804-698-4218 or by email at [tara.mason@deq.virginia.gov](mailto:tara.mason@deq.virginia.gov)

Respectfully,

A handwritten signature in cursive script that reads 'Tara D. Mason'.

Tara D. Mason  
Corrective Action Project Manager

cc: Brett Fisher, Leslie Romanchik, DEQ-CO  
Cassie McGoldrick, John Hopkins, Erich Weissbart, EPA Region III (3LC50)  
Melinda Woodruff, DEQ-TRO

Attachments



**Long-Term Stewardship Assessment Report  
Former JG Wilson site, Chesapeake, Virginia  
EPA ID# VAR0000000125**

Prepared by: Tara Mason

Date: March 13, 2017

**Introduction:** Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be observed. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e, ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in two fold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

**Site Background:** In 1989, the Virginia Department of Environmental Quality (VDEQ) issued a notice of non-compliance to J.G. Wilson regarding the storage of hazardous waste in its plating tanks and baths. The hazardous waste was described as spent cyanide solution from electroplating operations and plating bath residues from the bottom of plating baths for which cyanides are used in the process. By Letter of Commitment, August 25, 2004, the then owner of the property, Truxton Development agreed to conduct a RCRA Facility Investigation of the J.G. Wilson property. In 2007, the removal of 10,708 tons of impacted soil that exceeded residential screening levels for lead and/or arsenic was completed. With the excavation of all onsite contaminated soil to the water table it was expected that constituent of concern concentrations would continue to decline in the groundwater. In 2010, EPA issued the Final Decision and Response to Comments (FDRTC) requiring use restrictions for groundwater use and ongoing groundwater monitoring.

**Current Site Status:** The DEQ is the lead agency that provides oversight of RCRA Corrective Action activities at the Former JG Wilson site located in Chesapeake, VA. The final remedy requires the implementation of ICs in order to restrict the use of groundwater. In a letter dated July 19, 2011 (2012 actual), VDEQ agreed to terminate groundwater monitoring after arsenic and lead were not detected in all of the ten (10) on-site wells. An Environmental Covenant was finalized on September 18, 2012 requiring the groundwater use restrictions.



**Long-term Stewardship Site Visit:** On April 6, 2016, EPA conducted the long-term stewardship site walkover with the Kerneos Plant Manager, Project Manager, and their consultant to discuss and assess the status of the implemented remedies at the site. VDEQ met with EPA and Kerneos team after the site walkover. The attendees were:

<b>Name</b>	<b>Organization</b>	<b>Email Address</b>	<b>Phone No.</b>
Tara Mason	VADEQ – Central	<a href="mailto:Tara.mason@deq.virginia.gov">Tara.mason@deq.virginia.gov</a>	804-698-4218
Lisa Silvia	VADEQ – TRO	<a href="mailto:Lisa.silvia@deq.virginia.gov">Lisa.silvia@deq.virginia.gov</a>	757-518-2175
John Hopkins	USEPA - LCD	<a href="mailto:Hopkins.john@epa.gov">Hopkins.john@epa.gov</a>	215-814-3437
Erich Weissbart	USEPA – LCD	<a href="mailto:Weissbart.erich@epa.gov">Weissbart.erich@epa.gov</a>	410-305-2779
Mark Stein	Kerneos Inc.	<a href="mailto:Mark.stein@kerneos.com">Mark.stein@kerneos.com</a>	757-284-3200
Graham Reid	Kerneos Inc.	<a href="mailto:Graham.reid@kerneos.com">Graham.reid@kerneos.com</a>	751-284-3225
Jim O’Brian	Meridian Environmental	<a href="mailto:jobrien@meridian-env.com">jobrien@meridian-env.com</a>	804-218-0221

**Institutional Controls (ICs):**

***Groundwater:*** No groundwater from the upper aquifer shall be used for any purpose except environmental monitoring and testing. In the event that the current owner wishes to utilize groundwater as a drinking water source, then the current owner will be required to sample groundwater to confirm that the contaminants’ concentrations, which include lead and arsenic, remain below their respective MCLs, and present the results to EPA for written approval to proceed.

***Residential Use:*** The parcel is zoned for industrial use. However, the UECA does not identify residential use restrictions on the property.

***Excavation:*** There are no excavation restrictions placed on the property.

**Financial Assurance:** Financial Assurance is not required at the Facility.

**Engineering Controls (ECs):** There are no ECs placed on the subject property.

**Reporting Requirements/Compliance:** By the one year anniversary of the execution of the covenant and annually thereafter, the then current owner of the Property shall submit to the Agency and any Holder listed in the Acknowledgments, written documentation stating whether or not the activity and use limitations in the environmental covenant are being observed. The former owner Seagate Terminates submitted these reports to EPA with copy to VDEQ from September 2013 through September 2016. There are no issues of noncompliance in regards to annual reporting requirements as the facility has submitted this documentation annually.



The Facility ownership was transferred from Seagate Terminals to Kerneos Inc. in November 2016. VDEQ was not notified at the time. This was discovered when EPA scheduled the LTS inspection in February 2017. Upon request, Kerneos Inc, immediately complied with 9VAC15-90-40 and remitted the property transfer fee of \$100 to VDEQ.

**Mapping:** The EPA Facility website figures are accurate and include a geospatial PDF showing the use restriction boundary. The aerial photo is attached.

**Follow-up Activities:** DEQ will facilitate the Facility's desire to remove the UECA on the subject property as a result of remediation goals being met by reviewing the demonstration submitted by Kerneos's Consultant on March 2, 2017 and providing assistance in the UECA removal process. EPA's concurrence and facilitation will also be required as the Agency listed on the UECA.

**Conclusion:** The current IC has been implemented and is functional and maintained as required. The remediation goals have been met for the site. In addition, the City of Chesapeake Utility Ordinance does not allow use of private drinking water wells where public water supply is available. The DEQ concurs with the Facility's demonstration that the UECA is not needed on the subject property to be protective of human health and the environment.



**VDEQ Long Term Stewardship Inspection Aerial Photo**  
Former JG Wilson Site – Chesapeake, Virginia



**VDEQ Long Term Stewardship Inspection Site Photos  
Former JG Wilson Site – Chesapeake, Virginia**

Photos by: John Hopkins, EPA

March 1, 2017

**North**



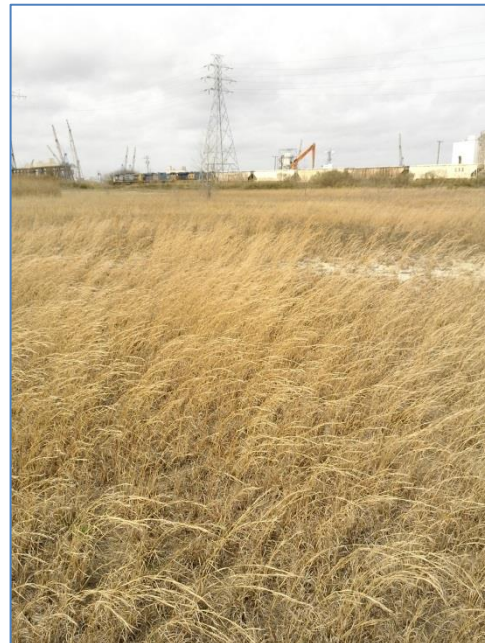
**Pond**



**Southwest**



**West**





EPA Field Notes Provided by John Hopkins, March 1, 2017

<u>IC Review and Inspection Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented?	X		
• Are the covenant restrictions and groundwater ordinance limitations eliminating or reducing exposure of all potential receptors to known contamination?	X		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied	X		
• Is the Facility connected to a public water supply?		X	There are no drinking water wells on-site
• Is groundwater on-site used as a potable water supply?		X	" ↓ "
• Since groundwater monitoring is no longer required, will existing monitoring wells be decommissioned?	X		Wells were closed summer 2012 in accordance w/ DEQ regs.
• Are the covenant and groundwater ordinance eliminating or reducing exposure of all potential receptors to known contamination?	X		
• Are there plans to develop or sell the property?		X	Kerneos does not plan to develop the property for atleast 2-3 years
• Are all parts of the Covenant being followed in order to ensure that the Covenant remains effective?	X		
• Is a Deed Notice for groundwater restriction in place?			N/A
• Are modifications to the Covenant needed?		X	(see notes below)
• Have all reporting requirements been met? (transfer of property, annual activity and use limitations compliance)	X		Kerneos purchased the property in Nov. 2016

Observations/Site Conditions

Observed by: John Hopkins, Erich Weissbart, Tara Mason, Lisa Silvia,  
Mark Stein (Kerneos), Graham Reid (Kerneos), Jim O'Brien  
(Meridian)

Notes: Property remains undeveloped. There is a pond in the middle of the property  
which serves as a wildlife habitat. Kerneos will make a demonstration  
to show gw is clean; once approved by DEQ, UECA may be terminated