



Long-Term Stewardship Assessment Report

Sims Metal Management

EPA ID #: VAD980918221

Suffolk, Virginia 23435

Prepared by: John Hopkins

Assessment Date: March 22, 2018

Report Date: March 27, 2018

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 enforced. 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 twofold, 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: Sims Metal Management (SMM) is a former facility located at 1177 Hosier Road in Suffolk, Virginia (Property) and is two miles south of the City of Suffolk. The Property is approximately 1.0 acres in size and was subdivided from a 11.0-acre parcel in early 2006 and is zoned as M-2 (heavy industrial). The site is bordered to the north by farmland, to the east by Hosier Road (Route 604), to the south by a 1.09-acre parcel consisting of farmland and wooded areas, and to the west by an easement for Virginia Electric Power Company (VEPCO). The Suffolk Municipal Airport abuts the 1.09-acre parcel to the southwest, and the closed Suffolk City Landfill, a former Superfund Site with arsenic and chromium contamination, is located approximately 0.75 miles to the southeast.

The first industrial use of the Property was by Old Dominion Wood Preservers which operated from January 1984 up to June 1990. Old Dominion treated wood with a chromated copper arsenate (CCA) solution and/or with a fire-retardant solution of ammonium phosphate. Environmental Reclamation Systems, Inc., Sierra (dba Virginia Soils Reclamation, Inc.) (hereinafter referred to as "Sierra") acquired the Property in 1993 and received and biologically treated petroleum contaminated soils until the mid-1990s. A rubber shredding operation, Coastal Scapes, leased a portion of the site in the mid-1990s to manufacture dyed rubber mulch from chipped tires. SMM purchased the Property in March 2006 for the receipt, storage, handling and shipping of recyclable ferrous and nonferrous metals. Facility operations began in 2007 and include the draining and flattening of scrap automobiles.

Current Site Status: In August 2013, EPA issued the Final Decision and Response to Comments (FDRTC). The final remedy determination is No Further Action with Controls. Controls include a Materials Management Plan, groundwater use restrictions and land use restrictions. The final remedy detailed in the FDRTC is implemented through a UECA Environmental Covenant between USEPA and SMM dated November 11, 2013 (Covenant). The Property is currently unused. SMM may seek to sell the property.

Long-term Stewardship Site Visit: On March 22, 2018, EPA conducted a long-term stewardship site visit with a SMM representative and its contractor to discuss and assess the status of the implemented remedies at the site.

The attendees were:

Name	Organization	Email Address	Phone No.
John Hopkins	EPA Region 3	hopkins.john@epa.gov	215-814-3437
Ed Hotham	EPA Region 3	hotham.leonard@epa.gov	215-814-5788
Timothy Neal	Sims Metal Management	timothy.neal@simsmm.com	757-793-3787
Rusty Field	One Environmental Group	rfield@oneenv.com	804-303-8784

Institutional Controls (ICs) Status:

UECA Environmental Covenant: The Covenant is the method for implementing institutional controls required as a condition of the Statement of Basis and Final Decision. The following ICs apply to the former SMM facility, shown on Figure 1:

Land Use Restriction: The Property may not be used for residential, agricultural or recreational purposes. There were no residential structures or agricultural/recreational uses of the site at the time of the visit. The Property is secured with a surrounding fence and locked gateway. SMM no longer operates at the site and is in compliance with land use restrictions.

Groundwater Use Restriction: With the exception of the existing non-potable well located onsite (DW-1) that is constructed to a depth of approximately 600 feet below grade, groundwater at the Property shall not be used for any purpose other than the monitoring activities. The Property is vacant and there were no uses of groundwater at the time of the visit.

Well Installation Restriction: No new wells have been drilled or installed at the Property.

Materials Management Plan: The Materials Management Plan (MMP) details how all excavated soils will be handled and disposed in areas of known contamination, such as the vicinity of soil boring S-3. This area is delineated by large concrete boulders (Picture 2). Soils removed from MMP areas must be sampled, characterized and handled accordingly. The vicinity of soil boring S-3 was observed intact with no signs of earth-moving activities.

Engineering Controls (ECs) Status:

No Engineering Controls are required at this Facility.

Groundwater Monitoring: SMM conducts annual groundwater monitoring at two wells. One downgradient or sentinel well (W-1) and one source area well (W-9R2) are sampled for benzene, ethylbenzene, methyl tert-butyl ether (MTBE) and arsenic. The latest 2017 groundwater sampling results showed neither benzene or ethylbenzene were detected in either of the two wells. MTBE was detected below the EPA Region III Tapwater Screening Level of 14 ug/L at W-9R2. Arsenic groundwater concentrations of 22 ug/L and 200 ug/L at monitoring wells W-1 and W-9R2 exceeded the Maximum Contaminant Level (MCL) of 10 ug/L, respectively.

Reported depths to groundwater in wells located in the Suffolk area range from 6 feet to 21 feet below ground surface. Groundwater flow direction beneath the Property is to the north/northwest. Monitoring wells no longer sampled (MW-6, W-6, W-11R and W-14) have been successfully abandoned in accordance with Virginia regulations.

Financial Assurance: Financial Assurance is not required for this site.

Reporting Requirements/Compliance: SMM is required to submit annual groundwater monitoring reports and annual compliance reports regarding activity and use restrictions recorded in the Environmental Covenant. There are no issues of noncompliance in regard to reporting requirements as SMM has submitted an “Annual Monitoring Report” each year, the last of which was received July 20, 2017 and was approved by Virginia Department of Environmental Quality August 1, 2017. No transfer of property, changes in use of the property, or work that will affect contamination at the property has been reported.

Mapping: The EPA facility website map is accurate and includes the 10-acre SMM parcel. The map was field verified and no issues were noted. A downloadable geospatial PDF map is available on EPA’s corrective action facility webpage under the “Reports, Documents and Photographs” section, found [here](#).

Conclusions and Recommendations: No EC/IC deficiencies were identified. EPA has determined that the remedy ECs/ICs have been implemented. EPA recommended that SMM place a padlock on monitoring well W-9R2. SMM confirmed with a picture of the new padlock (Picture 2).

Attachments:

Appendix A: Field Checklist

Figure 1: Aerial Map of Sims Metal Management

Picture 1: Vicinity of Soil Boring S-3

Picture 2: New Padlock on Monitoring Well W-9R2

Picture 3: Monitoring Well W-1

Picture 4: Vacant Buildings

Picture 5: Office Building

Current Groundwater Monitoring Network

Monitoring Well	Location	Condition	Notes
W1	Downgradient/Sentinel	Good Condition	✓
W3R	Downgradient/Sentinel	Abandoned	See Abandonment Report
W10	Downgradient/Sentinel	Abandoned	See Abandonment Report
W9R2	Interior/Source Area	Good Condition	Add Lock

Groundwater Constituents of Concern

Constituents	Maximum Contaminant Level (MCL)	Tap Water Regional Screening Level	Exceedances
Benzene	5 ug/L	N/A	Non-Detect
Ethylbenzene	700 ug/L	N/A	Non-Detect
Methyl tert-butyl ether (MTBE)	N/A	14 ug/L	Detected below 14 ug/L
Arsenic	10 ug/L	N/A	Exceedances @ W-1 and W-9R2

Abandon Monitoring Wells

Monitoring Wells	Location	Condition	Notes
W6	Interior/Source Area	Successfully Abandoned	
W7	Interior/Source Area		
MW6	Interior/Source Area		
W11R	Interior/Source Area		
W14	Upgradient/Background		

IC Review and Inspection Questions:

IC Review and Inspection Questions:	Yes	No	Notes
Any new wells installed at the facility?		X	
Is the facility being used for residential, agricultural or recreational purposes?		X	Facility is unused and secured
Groundwater monitoring wells still in place (4 wells)? 2	X		Two wells monitored W-1 and W-9R2
Any new construction or earth-moving activities?		X	
Is the groundwater plume still stable and not migrating?	X		Groundwater concentrations are steady and groundwater flow is
Groundwater contaminants decreasing in concentration?	X		Three of four constituents relative low of concern below screening levels
Are the groundwater flow rate and direction the same as mentioned in the previous studies?	X		

Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency (annual)?		X	Current groundwater monitoring plan is sufficient
• Have the Institutional Controls specified in the remedy been fully implemented?	X		
• Are the Environmental Covenant activity and use 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 groundwater on-site used as a potable water supply? (Excluding well DW-1)		X	The site is currently inactive
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?	X		
• Are there plans to develop or sell the property?		X	Looking to sell but no plans to as of now
• Are modifications to the Environmental Covenant needed?		X	
• Have all reporting requirements been met? (Annual Groundwater Monitoring Report and Environmental Covenant Compliance Reports)	X		All reporting requirements have been submitted in a single annual report

Observations/Site Conditions

Observed by: John Hopkins
Ed Hotham

Figure 1: Aerial Map of Sims Metal Management



Picture 1: Vicinity of Soil Boring S-3



Picture 2: New Padlock on Monitoring Well W9R2



Picture 3: Monitoring Well W1



Picture 4: Vacant Buildings (Southwest Direction)



Picture 5: Office Building (East Direction)

