



VIRGINIA DEPARTMENT OF ENVIRONMENT QUALITY

STATEMENT OF BASIS

Hoover Treated Wood Products, Inc.
18315 House Drive

Milford, Virginia

EPA ID No. VAD988190021

May 13, 2016

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I. INTRODUCTION

The Virginia Department of Environmental Quality (VDEQ) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Hoover Treated Wood Products, Inc. Facility located at 18315 House Drive, Milford, Virginia 22514 (hereinafter referred to as the Facility). DEQ's proposed decision consists of the following components: 1) continue the groundwater monitoring program and operation of existing groundwater extraction system, 2) continue to comply with the Facility's Corrective Measures Implementation Workplan, and 3) maintain compliance with institutional controls (ICs) in the form of land use restrictions. This SB highlights key information relied upon by DEQ in making its proposed decision.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up releases of hazardous waste and waste constituents that have occurred at their property. Information on the Corrective Action Program can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which DEQ's proposed decision is based. See Section VIII, Public Participation, for information on how you may review the AR.

II. FACILITY BACKGROUND

Hoover Treated Wood Products, Inc. (Hoover) operates a wood preserving facility located at 18315 House Road in Milford, Caroline County, Virginia at approximate latitude 38° 00' 32" North and longitude 77° 21' 59" West. Hoover owns approximately 53.48 acres of land at this site. Approximately 65% of the property is developed. The Hoover site is generally considered the developed portion of the property only; however the entire property is considered the "Facility" for the purposes of this document. The site is bounded on the south by a swamp with oxbow lake features, and on the north by a low lying marshy intermittent drainage way, to the northwest by Jones Chemical Inc., to the north by American Stone Mix Inc., to the east by undeveloped woodland, to the south by woodland and swamp followed by farmland and a residence, and to the west by Keller Ladders, Inc. (KLI).

The Hoover facility is not connected to a municipal water supply system and relies solely on wells installed on site for process water. No human consumption of the well water is allowed. Instead, the facility provides bottled water to employees and visitors, and well water is only used in toilets and process areas.

Wood is preserved at the Hoover facility by pressure treatment with a Chromated Copper Arsenate solution (CCA) and other wood preserving solutions, as well as interior and exterior fire retardants. Alkaline Copper Quat (ACQ) is also used as a wood preserving chemical at the facility. ACQ is a wood preservative that has been developed in recent years as an alternative to CCA. The fungicides and insecticides in ACQ consist of copper oxide (approximately 67%) and a quaternary ammonium compound (approximately 33%). Interior and exterior fire retardants used at the facility include Pyro-Guard® and Exterior Fire-X®. Pyro-Guard is pressure-impregnated, interior fire-retardant treated lumber and plywood for enclosed structural applications that is generally composed of boron, nitrogen, phosphorus, and sodium compounds. Exterior Fire-X is pressure-impregnated fire-retardant lumber and plywood that provides tested fire protection for applications directly exposed to the weather or high humidity, outdoors as well as indoors. Exterior Fire-X is generally composed of polymerized resin of nitrogen-phosphorus complex.

III. SUMMARY OF ENVIRONMENTAL HISTORY

3.1 RCRA Closure Activities

The site previously contained two RCRA waste management units. Hoover and DEQ entered into a Consent Order (effective date December 5, 1996) (The “Consent Order”) that specified that stabilized residual preservative material generated in the wood treatment process would be managed as F035 waste. The two units identified in the Agreement have historically been referred to as Building 1 and Area A.

Residual wood preservative material was stabilized in Building 1. The material was combined with a stabilizing agent in a closed mixer. The mixture of the stabilizing agent and residual preservative material was then placed in an open mixer where it was allowed to cure prior to being placed back into drums. The stabilized material was temporarily stored in Building 1, pending analytical results. If the toxicity characteristic leaching procedure (TCLP) analytical results were below the applicable standards for each constituent, the material was placed in Area A. Area A, located in the northwest portion of the Hoover facility (see Figure 1), is an area measuring approximately 50 feet by 200 feet where stabilized residual preservative materials were deposited.

Closure of the two units was completed between 1996 and 1999. Clean closure was achieved for Building 1 and its contents (no hazardous waste or constituents associated with Building 1 were detected in the underlying soil or groundwater). The Facility was able to achieve clean closure for soils in Area A in November 1999. However, clean closure or risk-based closure for Area A groundwater could not be achieved. Therefore, post-closure care to address groundwater and any necessary groundwater corrective action was required for former Area A.

The Facility is currently undergoing post-closure care for former Area A under the Hazardous Waste Management Permit for Post Closure Care VAD988190021, dated December 15, 2005 (Post-Closure Permit) . With the issuance of the 2015 Hazardous Waste Management Permit, post-closure care will be deferred to site-wide corrective action.

3.2 RCRA Facility Investigation

Under the facility's Post-Closure Permit, three hazardous waste management units (HWMUs) and four solid waste management units (SWMUs) at the facility were identified for review under the RCRA Facility Investigation (RFI) for the facility.

The following table provides descriptions of these units and closure status where applicable at the facility. The location of each waste management unit is depicted on Figure 1.

Unit	Description	Status
Building Number 1 (HWMU No.1)	Waste Accumulation Building	Clean Closure in December 1, 1999
Area A (HWMU No. 2)	50 x 200 Stabilized soil accumulation area	Soils clean closed November 30, 1999; Groundwater referred to Corrective Action
Hazardous Waste Satellite Accumulation Area (HWMU No 3)	Satellite Accumulation Area	In Use
Wood Debris Disposal Area (SWMU No. 1)	Former Burn Pit Area	Groundwater being monitored under site-wide corrective action
Parts Washers (SWMU No.2)	Leased parts washers	No action required
Office Septic Tank (SWMU No.3)	Septic tank and drainfield	No action required
Breakroom Septic Tank (SWMU No. 4)	Septic tank and drainfield for sanitary sewage from breakroom bathroom	No action required

Two areas were identified for further action during the RCRA Facility Investigation (RFI) process:

Area A (HWMU No. 2) Area A measures 50 feet by 200 feet with the long axis oriented in the east-west direction. The area historically received the stabilized material from Building One (HWMU No. 1). Area A was comprised of an upper layer of crushed stone and sand from the ground surface to a depth of 0.25 to 1.5 feet below the ground surface. The thickness of the crushed stone increased toward the western portion of Area A. Native soil primarily consisting of sand underlies the crushed stone layer to an approximate depth of 15 feet below grade, beneath which lies a sandy clay aquitard. Following characterization of the materials, approximately 370 tons of the crushed stone layer within Area A was removed for offsite disposal. Area A unsaturated soils were clean closed; therefore only specified constituents in groundwater (arsenic, chromium and copper) were subject to further investigation, as stated in the closure letter issued by VDEQ, dated November 30, 1999.

Wood Debris Disposal Area (SWMU No. 1) Referred to as the Former Burn Pit Area, this area was used historically to burn wood debris that accumulated on-site. Burning activities reportedly began circa 1985. The burn pit area was used infrequently, approximately three to four times per

year or less. Use of the burn pit ceased prior to 1992. The former burn pit area is located near the north border of the site, 200 feet north of Area A, covering approximately 1,000 square feet. No remnants of the burn pile are visible and the area is currently soil and grass covered. No data is available concerning the amount of wood burned. Based on soil and groundwater sampling conducted as part of the RCRA Facility Investigation phase of the Post-Closure Permit, no further soil assessment was deemed necessary and groundwater was to be addressed as part of the site-wide evaluation.

A Phase I RFI workplan was submitted to the VDEQ on February 4, 2010, detailing the proposed scope of work for the RFI. In the February 4, 2010 RFI workplan, Hoover proposed to assess soil from the burn pit area and assess site-wide groundwater from monitoring wells MW-3, MW-9, MW-10, MW-12, MW-13 and MW-14. Well locations are shown on Figure 2. Approval of the RFI workplan was granted by the VDEQ in correspondence dated February 16, 2010. An extension request for submittal of the RFI report was submitted electronically to the VDEQ on August 27, 2010 and proposed a revised due date of October 22, 2010. Approval of the extension request was granted by the VDEQ in correspondence dated August 31, 2010. An RFI Report was submitted on October 21, 2010 which provided the following results for the subsurface evaluation.

Soil

Based on the results of the June 2010 soil sampling event conducted as part of the Phase I RFI at the Wood Debris Disposal Area (SWMU No. 1), concentrations of aluminum, arsenic, barium, chromium, cobalt, copper, lead, nickel, vanadium and zinc were detected in the soil samples. However, only arsenic exceeded the pertinent industrial screening level of 1.6 mg/kg. Due to arsenic concentrations being comparable to those detected in background samples, it was concluded that naturally occurring metals in soil represented the likely source of the metals detected during the June 2010 soil sampling event.

Groundwater

Metals detected during the September 2010 groundwater sampling event included arsenic, barium, beryllium, cobalt, copper, hexavalent and trivalent chromium, lead, nickel, vanadium and zinc.

Of the detected metals, only arsenic and beryllium exceeded EPA Maximum Contaminant levels (MCLs). Arsenic in groundwater is currently being addressed under the existing RCRA compliance monitoring program. Beryllium on the other hand was detected in a single monitoring well MW-3 at a very low concentration just above the method detection limit and MCL. It should be noted that no beryllium was detected in a groundwater sample collected from the same monitoring well MW-3 in June 2010; however the sample was not deemed acceptable because an appropriate set of quality assurance and quality control samples were not collected.

Based on the results of the Phase I RFI, VDEQ required a Phase II RFI investigation including:

- Evaluation of potential of soil to groundwater transfer of arsenic near SWMU 1.
- Site-wide groundwater evaluation to delineate the lateral extent of arsenic in groundwater exceeding the MCL and to assess the potential for migration of contaminated groundwater off-site.
- Comprehensive evaluation of the on-site groundwater pumping system to determine overall remedial effectiveness.
- Assessment of potential off-site impacts.

3.3 Phase II RFI

A Phase II RCRA RFI report was submitted to the VDEQ on June 4, 2012 and was approved by the VDEQ in correspondence dated August 3, 2012. The following provides a summary of the findings of the Phase II RFI.

Soil to Groundwater Transfer of Arsenic at SWMU 1

VDEQ concurs that the contribution of arsenic in groundwater from soil at SWMU 1 is not significant, based on the site-wide groundwater evaluation and delineation discussed below.

Groundwater

Groundwater samples collected from direct push borings (RFI SL-1 through RFI SL-8) were analyzed for arsenic. Arsenic concentrations ranging from below laboratory detection limits of 0.002 mg/L to 0.468 mg/L were detected in groundwater.

The arsenic results from RFI SL-5, RFI SL-7, and RFI SL-8 indicate that there is a continuous plume of dissolved arsenic in groundwater that is defined in an east-west direction by MW-13 and MW-14 to the east and MW-1, MW-9, and MW-10 to the west, and RFI SL-3 to the northeast. The arsenic plume is defined to the extent feasible in a north-south direction based upon geographic limitations.

Water Supply Wells

On March 7, 2012, groundwater samples were collected from the two on-site water supply wells (WSW-Office and WSW-Plant) and analyzed for total arsenic. Arsenic was not detected in the water supply well samples.

Surface Water

On March 7, 2012, surface water samples were collected from the marsh to the north of the Hoover facility (RFI SW-1), and from the oxbow lake to the south of the Hoover facility (RFI SW-2), and were analyzed for total arsenic. Arsenic was detected in surface water sample RFI SW-1 at a concentration of 0.0023 mg/L during the March 2012 sampling event, which is below the Freshwater Quality Criteria (Virginia Administrative Code 9VAC25-260-140) of 0.15

mg/L. Arsenic was not detected in surface water sample RFI SW-2 above laboratory detection limits.

Sediment

Based on the sediment samples collected as part of the previous investigations at the Hoover facility in March 2012 and September 2013, concentrations of arsenic were detected in the sediment at concentrations ranging from 3.6 mg/kg to 49.6 mg/kg with an average concentration of 18.1 mg/kg. The source of the arsenic is most likely from current and historical agricultural activities in the vicinity of the facility. In addition, arsenic is a compound known to occur naturally in soil and groundwater systems. Based on published data including comparison to sediment quality guidelines (SQGs) for freshwater ecosystems {MacDonald DD, Ingersoll CG, Berger TA (2000) Development and Evaluation of Consensus-Based Sediment Quality Guidelines for Freshwater Ecosystems}, and an ecological study published for the Davis Creek tributary of the Ohio River (Huddleston GM, Dorn PB, Gillespie WB, Wong DCL, Slocomb JP (2008) Assessment of the Ecological Effects of Arsenic on a Southern Ohio, USA Stream), it was concluded that concentrations of arsenic detected in sediment samples are within acceptable concentrations and pose no ecological or environmental risk. The existing groundwater extraction system is providing an adequate barrier on both the north and south ends of the Hoover facility to collect arsenic-impacted groundwater prior to potential discharge to surface water. Therefore no further evaluation of the arsenic in sediment is warranted.

IV. CORRECTIVE ACTION OBJECTIVES

4.1 Soil

Based on previous investigation and removal of impacted soils during closure activities, VDEQ has determined that corrective measures for onsite soils are not necessary to be protective of human health and the environment under industrial use of the property. Because arsenic will remain in facility soils above levels appropriate for residential uses, under this proposed remedy, institutional controls are required to restrict the facility to non-residential uses. ICs are non-engineered instruments such as administrative and/or legal controls that minimize the potential for human exposure to contamination and/or protect the integrity of the remedy by limiting land or resource use.

This restriction will be imposed by the Facility's Hazardous Waste Management Permit for Site-Wide Corrective Action.

4.2 Groundwater

DEQ's policy is to restore groundwater to its most beneficial use if necessary, which is drinking water. Therefore, DEQ has determined that MCLs for contaminants are protective of human health and the environment for individual contaminants at this Facility. DEQ's Corrective Action Objectives for Facility groundwater are the following:

1. To control exposure to the hazardous constituents in the groundwater by requiring compliance with a groundwater use restriction at the Facility as long as a groundwater MCL is exceeded. This restriction will be imposed by the Facility's Hazardous Waste Management Permit for Site-Wide Corrective Action.
2. To reduce concentrations of arsenic in groundwater until the drinking water standard, namely the MCL, is met. In addition to active remediation utilizing the groundwater extraction system, ongoing groundwater monitoring will be continued in support of this objective.

Constituents and Standards

Constituent	Standard (ug/l)	Source
Arsenic	10.0	MCL

4.3 Surface Water and Sediment

The current media cleanup level for arsenic is 0.15 mg/L per the Freshwater Quality Criteria. Surface water sampling was conducted as part of the RCRA Facility Investigation phase of the Post-Closure Permit, and results were included in the Phase II RCRA Facility Investigation (RFI) report submitted to the VDEQ on June 4, 2012. Based on the water sampling results, VDEQ has concurred that no further action is required to be protective of human health and the environment.

The concentrations of arsenic detected in sediment samples are within acceptable concentrations and pose no ecological or environmental risk. In addition, the existing groundwater extraction system is providing an adequate barrier on both the north and south ends of the Hoover facility to collect arsenic-impacted groundwater prior to potential discharge to surface water. Therefore no further evaluation of the arsenic in sediment is warranted.

V. PROPOSED REMEDY

5.1 Summary

Under this proposed remedy, DEQ is requiring the following actions:

- 5.1.1 Continue remedial efforts utilizing groundwater extraction to reduce concentrations of arsenic in groundwater and continue to provide containment of the dissolved arsenic groundwater plume. Active remediation will continue until the remedial cleanup goals for arsenic have been met or until it has been demonstrated that the remedy is no longer effective.
- 5.1.2 Continue the groundwater monitoring program outlined in the Facility's approved CMI Plan to provide adequate hydraulic control of arsenic in groundwater and ongoing reductions in arsenic concentrations within the plume, and to monitor attenuation and/or dissipation of arsenic.

5.1.3 Compliance with Institutional Controls (ICs)

The Facility must comply with the following institutional controls which will be imposed by the Facility's Hazardous Waste Management Permit for Site Wide Corrective Action:

- a. Groundwater beneath the property shall not be used for any purposes except for environmental monitoring and testing, or for non-contact industrial use as may be approved by the agency subject to the considerations in the CMS until cleanup goals for groundwater have been met. Any new groundwater wells installed on the property must be approved by the agency.
- b. The facility property shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.

5.2 Implementation

DEQ proposes to implement the remedy through the Facility's Hazardous Waste Management Permit Renewal for Site-Wide Corrective Action. Therefore, DEQ does not anticipate any regulatory constraints in implementing its remedy. In addition, the Facility's Corrective Measures Implementation (CMI) Plan provides the basis for continued remedy implementation, remedy operations and maintenance, groundwater monitoring, evaluation of remedial effectiveness, and compliance with institutional controls.

5.3 Reporting Requirements

Compliance with and effectiveness of the proposed remedies at the Facility in reducing arsenic concentrations and restoring the groundwater to the MCL shall be evaluated and included in annual groundwater monitoring reports that are required by the Facility's Permit. Upon issuance of the Facility's Hazardous Waste Management Permit for site-wide corrective action, approval of the Facility's CMI Plan and remedy implementation, the Facility will continue to demonstrate compliance with and effectiveness of the proposed remedies in annual CMI Reports in accordance with the Facility's Permit and CMI Plan for remedy implementation.

VI. EVALUATION OF VDEQ'S PROPOSED DECISION

This section provides a description of the criteria DEQ used to evaluate the proposed decision consistent with EPA guidance. The criteria are applied in two phases. In the first phase, DEQ evaluates three decision threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, DEQ then evaluates seven balancing criteria to determine which proposed decision alternative provides the best relative combination of attributes.

6.1 Threshold Criteria

6.1.1 Protect Health and the Environment

Based on the results of the Phase I and II RFI, there are no remaining large, discrete sources of waste from which constituents would be released to the environment. Residual concentrations of arsenic are present in soils above residential risk based screening levels. However, this constituent is often found at elevated levels from natural sources. With respect to groundwater, arsenic remains above an acceptable range for drinking water. The onsite groundwater extraction system has reduced the potential risk to human and the environment posed by arsenic in groundwater. The system will continue to operate and reduce arsenic concentrations and maintain hydraulic control until drinking water standards are achieved. VDEQ has proposed land use restrictions in order to minimize the potential for human exposure to that contamination.

6.1.2 Achieve Media Cleanup Objectives

For groundwater, the Facility's media cleanup objective is EPA's MCL for Arsenic of 10 ug/L. With this remedy decision, VDEQ requires the implementation and maintenance of institutional controls to restrict the use of groundwater for potable purposes, the continuation of the onsite groundwater extraction system to maintain hydraulic control until the MCL is met, and compliance with residential use restrictions.

6.1.3 Remediating the Source of Releases

In all remedy decisions, VDEQ seeks to eliminate or reduce further releases of hazardous wastes or hazardous constituents that may pose a threat to human health and the environment. The Facility remediated areas of impacted soil during the 1999 closure activities, and installed and operates groundwater monitoring and recovery wells and a groundwater extraction system. VDEQ's proposed remedy requires the continued operation of the remediation system and monitoring of groundwater to demonstrate progress or determine if additional measures are necessary.

6.2 Balancing/Evaluation Criteria

6.2.1 Long-Term Effectiveness

Concentrations of dissolved arsenic detected at the facility have been greatly reduced overall since the groundwater pumping system was placed into operation in January 2003. Manipulation of the current groundwater recovery system through varying combinations of active existing recovery wells is expected to result in a continuing decrease in arsenic concentrations in the long-term. At least annually, Hoover will evaluate the results of the groundwater recovery system and

make additional recommendations to modify and enhance operation of the groundwater recovery system as needed. These enhancements may include adjustments to pumping rates from select recovery wells and pumping from recovery well locations that will yield the highest concentrations of arsenic.

6.2.2 Short-Term Effectiveness

Groundwater recovery is an inherently lengthy process. However, groundwater recovery will contain the plume so that it does not pose a risk to area receptors. Therefore, based on the long term effectiveness outlined above, short-term effectiveness is not required.

6.2.3 Reduction in Toxicity, Mobility or Waste Volume

The existing system provides plume stability in the north, south, east, and west directions, prevents mobility and reduces the arsenic concentrations in groundwater. Adjustments to the current groundwater recovery system will be made as necessary to assist in further reducing the arsenic concentrations in groundwater at the facility.

6.2.4 Implementation Feasibility

Hoover proposes to utilize the existing recovery system, and implementation feasibility is therefore not a factor. The existing system will be evaluated each year and modifications implemented as needed. Since recovered groundwater is used in the wood treatment process at the Facility, the production rate at the Facility is a potential limiting factor for groundwater recovery volume. However, as the historical data has shown over the past 10 years, the existing recovery system is performing well at the current extraction rates and will be continued. Hoover will address the issue if future conditions indicate that the performance of the groundwater recovery system is being adversely affected.

6.2.5 Public Notification

The public will be notified of the public comment period for the renewal of the Facility's Hazardous Waste Management Permit for Site-Wide Corrective Action, which will last sixty (45) calendar days. DEQ's final decision will be described in the Facility's Permit which will be modified to include the additional facets of the final remedy.

6.2.6 Estimated Cost

The estimated annual cost associated with the on-going operation of the groundwater recovery system is approximately \$35,000 and includes groundwater monitoring, reporting, equipment maintenance and utility charges.

VII. FINANCIAL ASSURANCE

The Facility is already providing financial assurance for continued groundwater monitoring and investigation activities required by the Facility's Permit. Updated cost estimates for DEQ's final decision are required by the Permit and will be the basis for financial responsibility for the implementation and operation and maintenance of the final remedy.

VIII. PUBLIC PARTICIPATION

Interested persons are invited to comment on VDEQ's proposed decision during the comment period for the renewal of the Facility's Hazardous Waste Post-Closure Care Permit, which will incorporate the remedy. The public comment period will last forty-five (45) calendar days from the date the notice is published in a local newspaper.

The Administrative Record contains all the information considered by VDEQ for its proposed remedy for the Facility. To receive a copy of the Administrative Record or for additional information regarding the proposed remedy, please contact Mrs. Tara Mason at (804) 698-4218 or tara.mason@deq.virginia.gov.

The public comment period will last forty-five (45) calendar days from the date the notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Ms. Angela Alonso at the address listed below.

Virginia Department of Environmental Quality
629 East Main Street
P.O. Box 1105
Richmond, VA 23219
Contact: Angela.Alonso
Phone: (804) 698-4328
Email: Angela.Alonso@deq.virginia.gov

VDEQ will make a final decision after considering all comments, consistent with the applicable RCRA requirements and regulations. If the decision is substantially unchanged from the one in this Statement of Basis, VDEQ will issue a final decision through issuance of the Corrective Action Permit and inform all persons who submitted written comments or requested notice of VDEQ's final determination. If the final decision is significantly different from the one proposed, VDEQ will issue a public notice explaining the new decision and will reopen the comment period.

Hoover Treated Wood Products, Inc.
18315 House Drive
Milford, Virginia
EPA ID No. VAD988190021

ADMINISTRATIVE RECORD

Index of Documents for Statement of Basis

This index includes documents that the Virginia Department of Environmental Quality (VDEQ) relied upon to develop and propose the final remedy selection determination described in the Statement of Basis. These documents were prepared for the Hoover Treated Wood Products, Inc. facility and are listed chronologically by document date.

	Title	Date
1.	Groundwater Monitoring Plan	May 8, 1997
2.	Area A Closure Report	September 17, 1999
3.	Building One Closure Report	October 27, 1999
4.	Building One Supplemental Confirmation Samples Report	November 18, 1999
5.	Notice of Soil Closure of Area A and Call for Post-Closure Permit Application	November 30, 1999
6.	Notice of Clean Closure for Building One	December 1, 1999
7.	Post Closure Care Permit Application	February 27, 2003
8.	Amended Post Closure Care Permit Application	March 4, 2004
9.	Groundwater Sampling and Analysis Plan (Revised)	November 29, 2004
10.	Hazardous Waste Management Post- Closure Care Permit	December 14, 2005
11.	Environmental Indicator Documents – Migration of Groundwater	July 18, 2006
12.	Class 1 Permit Modification	December 6, 2007
13.	Environmental Indicator Form – Human Health	September 16, 2008
14.	Class 1 Permit Modification	October 27, 2008
15.	Class 1 Permit Modification	November 24, 2008
16.	Class 1 Permit Modification	June 15, 2009
17.	Phase I RFI – February 2010 Revision	February 4, 2010
18.	DEQ Approval of Phase I RFI Workplan	February 16, 2010
19.	Phase I RFI Report	October 21, 2010
20.	Class 1 Permit Modification	January 25, 2011
21.	DEQ Comments to Phase I RFI Report and Request for Phase II Workplan	March 7, 2011
22.	Facility Response Comments on Phase I RFI Report Comments	May 26, 2011
23.	DEQ 2 nd Response Comments to Phase I RFI Report	June 7, 2011
24.	Groundwater Sampling and Analysis Plan (Revised)	December 14, 2011
25.	Phase II RFI Workplan – 1 st Revision	January 4, 2012
26.	Phase II RFI Workplan – Acknowledgement of Conditional Approval	February 9, 2012
27.	Phase II RFI Report	June 4, 2012
28.	Phase II RFI Report Approval	August 3, 2012

	Title	Date
29.	Revised Corrective Measures Study	November 21, 2013
30.	DEQ CMS Approval	May 20, 2014
31.	Revised CMI Workplan	December 8, 2014
32.	CMI Workplan Approval	January 15, 2015
33.	Hazardous Waste Management Permit for Corrective Action – Permit Application	June 12, 2015