



**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**STATEMENT OF BASIS**

**AMOCO OIL COMPANY, A MEMBER OF THE BP GROUP  
YORKTOWN  
YORK COUNTY, VIRGINIA**

U.S. EPA REGION III  
STATEMENT OF BASIS  
AMOCO OIL COMPANY  
YORKTOWN, YORK COUNTY, VIRGINIA

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**ACRONYMS**

AOC	Area of Concern
API	American Petroleum Institute
AST	Aboveground Storage Tank
BP	British Petroleum
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
CAMU	Corrective Action Management Unit
CFR	Code of Federal Regulations
CMS	Corrective Measures Study
EPA	Environmental Protection Agency
ETBE	Ethyl-Tertiary-Butyl-Ether
GPRA	Government Performance and Results Act
IC	Institutional Control
IM	Interim Measure
LNAPL	Light Non-Aqueous Phase Liquid
MCL	Maximum Contaminant Level
MTBE	Methyl-Tertiary-Butyl-Ether
RBC	Risk Based Concentration
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SB	Statement of Basis
SVOC	Semi-Volatile Organic Compound
SWMU	Solid Waste Management Unit
U.S.C.	United States Code
VDEQ	Virginia Department of Environmental Quality
VOC	Volatile Organic Compound

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VPDES      Virginia Pollution Discharge Elimination System

STATEMENT OF BASIS FOR PROPOSED CORRECTIVE MEASURES  
UNDER RCRA SECTION 3008(h)  
AMOCO OIL COMPANY  
YORKTOWN, YORK COUNTY, VIRGINIA

**I. Introduction**

This Statement of Basis (“SB”) explains EPA’s proposed corrective measures for remediating soil, groundwater, sediment and surface water contaminated with volatile and semivolatile organic compounds and metals at the Amoco Oil Company (“BP”)<sup>1</sup>, Yorktown Refinery (“Facility”), located near Yorktown, York County, Virginia. This document summarizes the corrective measures that the United States Environmental Protection Agency (“EPA”) and BP have developed and evaluated under an Administrative Consent Order (“Order” or “Consent Order”), entered into between EPA and BP on November 4, 1991, Docket Number RCRA-III-046-CA, pursuant to Section 3008(h) of the Resource Conservation and Recovery Act (“RCRA”)<sup>2</sup>, as amended, 42 U.S.C. Section 6928(h).

In accordance with the Order, BP completed the tasks described in EPA-approved **RCRA Facility Investigation** (“RFI”) Work Plans and it completed a **Corrective Measures Study** (“CMS”). The purpose of the RFI was to determine the nature and extent of any releases of hazardous wastes or hazardous constituents from **Solid Waste Management Units** (“SWMUs”) and **Areas of Concern** (“AOCs”) at the Facility. The CMS presents corrective measures to address contamination identified during the RFI, and during the course of other investigations completed by BP under the direction of the Virginia Department of Environmental Quality (“VDEQ”) Aboveground Storage Tank (“AST”) program, that presents a risk to human health and the environment. The evaluation of risk to human health and the environment was performed through a risk assessment, which is contained within the CMS. BP also has applied to EPA to designate a **Corrective Action Management Unit** (“CAMU”) for managing remediation wastes during corrective action, and the CAMU is a focal point of the proposed corrective measures described here and in the CMS.

This document describes the corrective measures EPA considered to address contamination of groundwater, soil, surface water and sediments at the Facility, and explains EPA’s rationale for the proposed corrective measures. This document also summarizes information that can be found in greater detail in the work plans and reports submitted by the Facility to EPA and VDEQ during the RFI and CAMU application processes. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, EPA encourages the public to review these documents, which are found in the Administrative Record. The Administrative Record is located at the EPA Region III Office. The SB and Index for the Administrative Record are available for review at the

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<sup>1</sup> As of October 1, 2001, Amoco Oil Company changed its name to “BP Products North America, Inc.” For simplicity, Amoco Oil Company, a subsidiary of BP Company North America Inc., shall be referred to herein as “BP”. On May 14, 2002 Giant Industries Incorporated (“Giant”) assumed ownership of the Yorktown Refinery. The new name for Giant’s business at the Refinery is Giant Yorktown, Incorporated.

<sup>2</sup> Words and abbreviations set forth in **bold** type are further defined in the Glossary attached hereto.























































