

STERLING CASKET HARDWARE COMPANY

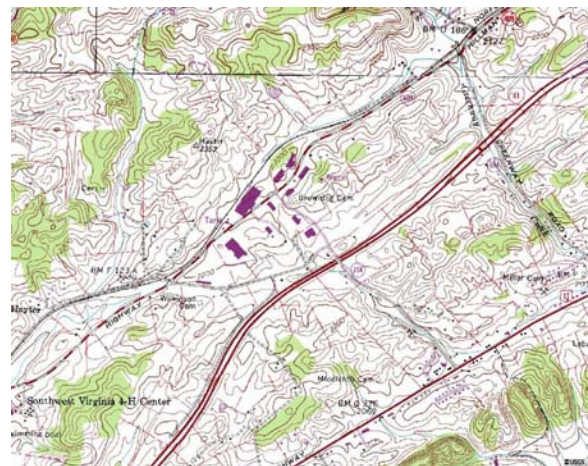
14430 Enterprise Road
Abingdon, VA 24210
Congressional District 9
EPA ID No.: VAD000020115
Last Updated 07/07/2009

Topographic Location Map



Projection: North American Datum 1983 / UTM Zone 17N
Provider: U.S. Geological Survey
Date: 05/01/1999

Aerial Location Map



Projection: North American Datum 1983 / UTM Zone 17N
Provider: U.S. Geological Survey
Date: 07/01/1991

Current RCRA CA Activities

The Virginia Department of Environmental Quality (DEQ) is the lead agency for oversight of Corrective Action (CA) work at the Sterling Casket Hardware Company (Sterling Casket) facility under the Resource Conservation and Recovery Act (RCRA).

The DEQ and Sterling Casket entered into a Consent Order (CO) for post-closure care of the closed impoundments on September 30, 1994.

The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of a Facility Lead Agreement (FLA), dated August 21, 2002, entered into between Sterling Casket and the EPA to address the necessary RCRA CA work at the facility. This facility is one of EPA Region III's high priority RCRA Corrective Action sites.

A draft site specific RCRA Facility Investigation (RFI) Workplan was submitted to the DEQ and the EPA on November 25, 2002. A Soils Data Report was submitted by the U.S. Army Corp. of

Engineers (ACOE) in order to help establish the Environmental Indicators (EIs) at the facility site and to determine the extent of the RFI needed for the subject facility following the initial site investigation activities. The Soils Data Report was submitted to the Department in 2003, and has been subsequently reviewed by the DEQ.

The DEQ conducted a telephone conference with Sterling Casket on September 4, 2003, to discuss groundwater monitoring requirements, the current status of RCRA Corrective Action controls, and the RFI Work Plan. Sterling Casket collected quarterly samples from the newly installed groundwater monitoring wells from October 2003 to October 2004, and has been collecting semiannual samples since then. As of the most recent sampling event, none of the constituents of concern exceeded applicable contaminant levels.

In late 2007, the DEQ became aware of Sterling Casket's financial difficulties.

In August - September 2008, the DEQ reviewed the most recent groundwater monitoring data and the Soils Data Report for the site to determine if the facility met acceptable CA risk-based levels of constituents of concern (COCs) in soils and groundwater at the site and whether it was appropriate to be released from its obligations under the signed CO. Based on additional risk assessment evaluations of the soils data the DEQ determined that existing levels of COCs in soils were sufficient to meet CA risk-based criteria and standards with the exception of one area around the Sump (SB-1).

The DEQ sent Sterling Casket a letter dated February 3, 2009, requesting a cleanup action (soil excavation) from the area around the Sump. In addition, this letter stated that groundwater sampling must continue for at least three additional events to confirm the levels of hazardous constituents in groundwater. In response to this above DEQ letter, on March 4, 2009, Sterling Casket submitted photographs depicting soil excavation in the area around the Sump. After review of these photographs, the DEQ determined that the soil in the area around the Sump had in fact already been excavated and backfilled with clean soil. Based on this information, in a letter dated March 19, 2009, the DEQ advised Sterling Casket that the recommended clean-up action for the area around the Sump (SB-1) was no longer required since the soils in question were not impacted due to RCRA regulated activities. In addition, Sterling Casket was advised that future land use on the facility property will still be restricted to industrial use only and that groundwater sampling must continue for at least three additional events to confirm the levels of hazardous constituents in groundwater. A groundwater sampling event was conducted on April 26, 2009.

Site Description

The Sterling Casket Hardware Company (Sterling Casket) facility is located in Abingdon, Washington County, Virginia, near the intersection of State Routes 704 and 879. The site comprises approximately 4.9 acres of land and is improved with a process building, paved parking lot, and landscaped areas. The site is bound to the north by Tri-Tube Industries, to the east by State Route 704, to the south by State Route 879, and to the west by open, undeveloped land.

The site has been owned and operated by Sterling Casket since 1963. Sterling Casket uses the site to manufacture casket hardware. On-site activities include molding, casting, electroplating, painting, and assembly of casket hardware parts. Although lead casting was performed in the past, only zinc casting is currently performed.

Sterling Casket currently performs nickel and cyanide-based (copper and bronze) plating. The process building houses a machine shop, a casket hardware molding room, a shipping warehouse, a painting room, a flammable chemical storage room, several hardware assembly areas, and an electroplating process area.

Several hazardous waste surface impoundments at the facility were closed with wastes in place on May 31, 1989.

The DEQ and Sterling Casket entered into a Consent Order (CO) for post-closure care of the closed impoundments on September 30, 1994.

RCRA CA Milestones

To date, the following RCRA CA milestones have been completed at this facility:

- February 27, 1991, EPA Region III completed a *Preliminary Assessment (PA)*.
- September 1995, EPA Region III completed a *Stabilization Initiative Inspection Report*.
- June 17, 2002, Draft Soil Sampling Plan for site submitted by US ACOE
- July 10, 2002, DEQ approved Final Sampling Project Plan for soil sampling at site
- August 21, 2002, Sterling entered into a Facility Lead Agreement (FLA) to address the necessary RCRA Corrective Action work at the facility.
- November 25, 2002, a draft site RFI Workplan/Report was submitted to the DEQ and the EPA.
- April 4, 2003, Final Soil Sampling Report submitted to the DEQ.
- September 9, 2004, Environmental Indicator status Yes for both human health and groundwater (last revision).
- In a March 19, 2009 letter the DEQ: 1) concurred that Sterling Casket had satisfied the recommend clean-up action in the area around the Sump, 2) accepted the Phase I RFI Report, and 3) concurred that the information submitted by Sterling Casket to the DEQ meets the criteria and standards of the Corrective Action Facility Lead Program, 4) advised that future land use on the facility property will still be restricted to industrial use only, and 5) advised that groundwater sampling must continue for at least three additional events to confirm the levels of hazardous constituents in groundwater.

Details and supporting documentation regarding the above can be obtained by reviewing files at the DEQ's Central Office or by contacting the project managers identified in this fact sheet.

Environmental Indicator Status

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address high priority RCRA Corrective Action facilities by the year 2008. EPA is evaluating two

key Environmental Indicators (EIs) for each facility: Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control. This facility is one of EPA Region III's high priority facilities and falls under this initiative.

Virginia's current evaluation of Environmental Indicators for this facility is as follows:

- *Human Exposures Controlled Determination:* The DEQ has made the EI determination of "yes, that current human exposures are under control." The above determination is based upon the DEQ's Current Human Health Environmental Indicator (HHEI) Determination Report, CA 725, dated September 2004. This above HHEI determination is considered current, effective July 7, 2009.
- *Release to Groundwater Controlled Determination:* The DEQ has made the EI determination of "yes, that migration of contaminated groundwater is under control," based upon the review of CA information for the CCP site contained in the EI determination Report, CA750, dated September 2004. The above EI determination indicates that the migration of "contaminated" groundwater is believed to be under control, and that monitoring will be conducted to confirm that contaminated groundwater remains under control. This EI determination is considered current, effective July 7, 2009.

Contaminants

Groundwater samples were collected from the new wells from October 2003 through October 2004. The contaminants of concern in the groundwater appeared to be arsenic, chromium and lead. Beginning in May 2005, groundwater monitoring was conducted on a semi-annual basis. During the three most recent sampling events (November 2006, April 2007 and December 2007), none of the constituents of concern exceeded applicable maximum or alternate concentration limits.

The contaminants of concern in the soils appear to be nickel, copper, cadmium, and arsenic. Sampling conducted in July 2002 shows levels of these contaminants in soils slightly exceeding the EPA Region III residential Risk-Based Concentration (RBC) criteria. Based on risk assessment evaluations of the soils data, the DEQ determined that existing levels of COCs in soils were sufficient to meet CA risk-based criteria and standards for industrial use.

Institutional Controls

The DEQ and Sterling Casket entered into a Consent Order (CO) for post-closure care of the closed impoundments on September 30, 1994.

A Deed Notice is in place identifying the location of the hazardous waste surface impoundments closed with waste in place as a landfill.

Community Involvement

Citizens' questions and concerns may be directed to the DEQ contact below. Also, the Administrative Record containing relevant information is available for public review at the following location(s):

Virginia Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219
Phone: (804) 698-4126
Contact: Matthew Stepien

Government Contacts

The Commonwealth of Virginia DEQ has the lead CA authority for this project. Please contact the DEQ project manager listed below for details on this project or the contents of this fact sheet.

DEQ Project Manager

Mr. Matthew M. Stepien
Virginia Department of Environmental Quality
629 East Main Street
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EPA Project Manager

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U.S. Environmental Protection Agency - Region III
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For more information about EPA's CA program, including Environmental Indicators, please visit EPA's website at: www.epa.gov/reg3wcmd/correctiveaction.htm.

Facility Contact

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Fact Sheet Update

The previous fact sheet was updated January 8, 2009. The next fact sheet update is scheduled for January 2010. Previous fact sheets may be obtained through the listed DEQ contact.