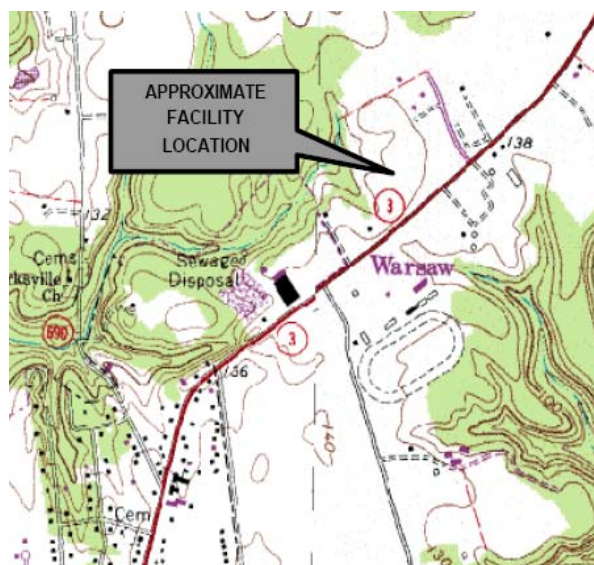
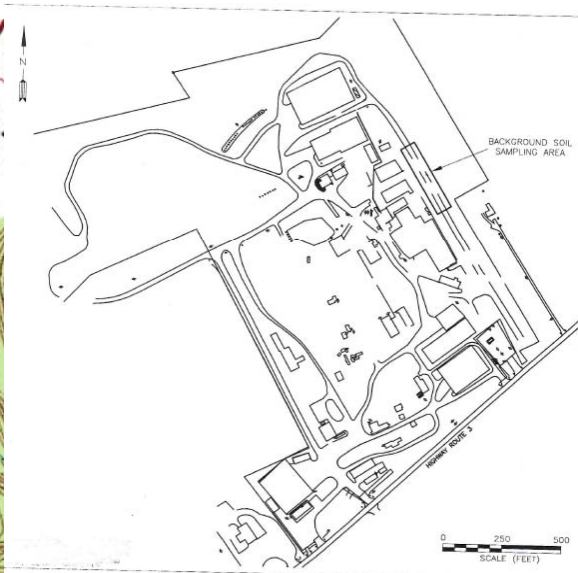


Wood Preservers, Inc.

Route 3 North
Warsaw, Virginia 22572
Congressional District 3
EPA ID #: VAD003113750
Updated: 07/07/2009



Facility Location Map
(Scale: 1 inch = 2,400 ft approx.)



Facility Site Plan
(Scale: 1 inch = 800 ft approx.)

Current RCRA CA Activities

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

The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of a Consent Order (CO) issued by the Commonwealth of Virginia, DEQ, to the facility owner with an effective date of September 30, 1994. The CO was modified in 1998 to include the requirements of a Post-Closure Plan. The CO and Post-Closure Plan were issued in lieu of issuing a Post-Closure Permit to the facility.

CA investigations and necessary clean up activities are also being implemented in accordance with a voluntary Facility Lead Agreement (FLA) that was signed between Wood Preservers, Inc. (WPI) and the U.S. EPA on August 9, 2002. The DEQ has been delegated by the EPA as the lead agency for oversight of the FLA.

WPI performed Interim Measures (IMs) consisting of in-situ treatment of Hexavalent Chromium

in the Former Process Area (AOC-2). An IM Report for Hexavalent Chromium Treatment for the AOC-2 Old Treatment Plant Area, dated January 2007, documented conversion of Hexavalent Chromium to trivalent chromium and included results of soil samples taken beneath the Former Process Area. Arsenic remains a constituent of concern (COC) at AOC-2.

On April 11, 2008, the DEQ granted final approval for installation of a system of groundwater wells to provide Demonstration Testing for the Biological Degradation of COCs in soil and groundwater for the Closed Surface Impoundment (SWMU-1) in compliance with the Enforcement Order, issued to WPI in 1995 and modified in 1998.

On May 2, 2008, field work was completed to install system of groundwater wells to provide Demonstration Testing for the Biological Degradation of COCs in soil and groundwater for the Closed Surface Impoundment (SWMU-1). Testing and evaluation at SWMU-1 are ongoing and in compliance with the Enforcement Order, issued to WPI in 1995 and modified in 1998.

On May 20, 2008, the DEQ granted approval for installation of air sparge wells to conduct testing so that an Interim Measures (IM) Design and Work Plan can be prepared to remediate groundwater for polycyclic aromatic hydrocarbons (PAHs) in the Old Process Area, AOC 2. The proposed work in AOC 2 will be done in accordance with the Facility Lead Agreement (FLA) signed August 9, 2002.

On November 3, 2008, WPI submitted the *Interim Measure Work Plan Addendum for Arsenic and Organic Constituent Groundwater Treatment at AOC-2, Old Treating Plant Area*, dated October 31, 2008. The DEQ provided comments in a letter, dated December 5, 2008. On March 18, 2009, WPI submitted a response to comments to the above DEQ's letter. On May 21, 2009, DEQ correspondence was sent to WPI; the DEQ considered the WPI's response to comments adequate and requested a revised Work Plan incorporating all the required and documented changes.

The DEQ is working with WPI in WPI's attempt to achieve a risk-based closure for the Closed Spray Evaporation Pond (SWMU-2), a Regulated HWMU.

On May 20, 2009, a meeting was held between the DEQ and WPI to discuss the regulatory matters regarding the facility. The Enforcement Order, Facility Lead Agreement and how to proceed with issuance of Post-Closure Permit were discussed. On May 21, 2009, the DEQ presented WPI with a letter, dated May 21, 2009, discussing the DEQ's recommendation to the groundwater monitoring program, which may modify the Enforcement Order. The DEQ is awaiting a facility response to the above DEQ letter.

Site Description

WPI operates a wood treating facility in Warsaw, VA. The facility began operations in 1975 and is a fully integrated wood preserving plant. Raw wood is transported to the site, cut, debarked, and milled to the desired product.

Pentachlorophenol (an "oil-borne" process) was used at the old treating area of the facility between 1975 and 1983. Creosote and chromated copper arsenate (CCA) were also used as wood preservatives at the old treating area. The wood is currently preserved using a "water-borne" CCA process with Dricon, a water-borne fire retardant with boron as the primary ingredient.

The WPI facility uses pressurized treating cylinders to apply the CCA preservative solution. Before leaving the treatment cylinder, excess preservative is drawn from the wood using a vacuum system. The treated wood is removed from the treating cylinder and allowed to dry in a covered area with a concrete floor constructed with an underlying synthetic liner in accordance with RCRA Subpart W regulations (RCRA Subpart W “drip pad”).

Two solid waste management units (SWMUs), SWMU-1, Closed Surface Impoundment (SI), and SWMU-2, Closed Spray Evaporation Pond (SEP), were closed in 1988 as landfills because “clean closure” under the RCRA could not be demonstrated.

The wood preserving operations in the Old Process Building designated as Area of Concern-2 (AOC-2), the Old Treatment Plant Area, were terminated prior to the December 24, 1992, the effective date of the 40 CFR 265 Subpart W unit specific drip pad facility requirements. Because operation in the AOC-2, Old Treatment Plant Area, was terminated prior to December 24, 1992, the AOC-2, Old Treatment Plant Area, is not subject to closure requirements under the Virginia Hazardous Waste Management Regulations (VHWMR) and the RCRA Subpart W unit specific drip pad facility requirements. However, AOC-2 is subject to CA under the Hazardous and Solid Waste Amendments (HSWA) of the RCRA of 1984.

A Consent Order (CO) was issued by the Commonwealth of Virginia, DEQ, to the facility owner with an effective date of September 30, 1994, to address the closure and post-closure care of the regulated units (SWMUs 1 and 2). The CO was amended in 1998 to incorporate a Post-Closure Plan, which incorporates the technical and administrative requirements equivalent to a Post-Closure Permit.

A groundwater treatment and extraction system has been operational at the facility since the 1980's to contain a contaminant plume related to releases from the facility's former surface impoundments, the regulated units SWMUs 1 and 2. Continued operation of the groundwater treatment and extraction system is required by the terms of the Consent Order issued by the Commonwealth in 1994 and modified in 1998, to address the regulated units SWMUs 1 and 2.

A Facility Lead Agreement was signed August 9, 2002, between WPI and the U. S. EPA, to address site-wide CA at the facility site.

A draft RCRA Facility (RFI) Work Plan, dated October 1, 2001, was developed in accordance with U.S. EPA guidance. The Closed Surface Impoundment (SWMU 1), the Closed Spray Evaporation Pond (SWMU 2), the Former Drip Pad (area of concern (AOC-1)), and the Old Treating Plant Area (AOC-2) are areas of primary concern.

RCRA CA Milestones

The following RCRA corrective action (CA) milestones have been achieved at this facility:

- WPI submitted an application, dated May 5, 1988, for a post closure permit covering the maintenance and monitoring of one capped surface impoundment (SWMU-1) and one capped spray evaporation impoundment (SWMU-2), each containing K001 sludge. WPI was using creosote and CAA solution in its wood treatment process at this time.
- The capped surface impoundment and capped spray evaporation impoundment were certified closed on September 19, 1988.
- A Consent Order (CO) to address CA was issued by the Commonwealth and signed by

facility owner on September 29, 2004. The CO was modified September 28, 1998, to incorporate a Post-Closure Plan as Appendix A of the CO.

- WPI entered into a RCRA Corrective Action Facility Lead Agreement with the DEQ and the United States Environmental Protection Agency (U.S.EPA) in August 2002.
- Human Exposures Under Control Determination was accepted by DEQ on September 27, 2001.
- WPI submitted a draft RFI Work Plan dated October 1, 2001.
- The RCRA Facility Investigation (RFI) Work Plan was approved November 18, 2002. This RFI Work Plan includes all activities required for an RFA and a RFI.
- The RFI Report was submitted to the DEQ in June 2003, and a supplemental RFI Work Plan including the addition of two groundwater monitoring wells and the collection of samples for pre-design evaluation was submitted in 2003. The additional field work was performed in April 2005.
- A revised April 2005 Work Plan for Closure Evaluation, Closed Surface Impoundment and Closed Spray Evaporation Pond was approved by DEQ on April 25, 2005.
- An Interim Measures (IM) Work Plan for Hexavalent Chromium at AOC-2, Old Treating Plant Area, dated August 23, 2005, was approved by DEQ on August 30, 2005.
- WPI completed an interim measure (IM) consisting of in-situ treatment of Hexavalent Chromium in the Former Process Area designated as AOC 2, Old Treating Plant Area. This IM began in late summer 2005, and followed the IM Workplan approved by DEQ on April 25, 2005.
- A Risk-Based Closure Demonstration for SWMU No. 2, the Closed Spray Evaporation Pond, dated October 2006, was received by DEQ on October 24, 2006. DEQ issued a Notice of Deficiency comments in a letter dated January 4, 2007, stating that risk based factors in State of Virginia Risk Assessment Guidance must be met for a Risk-Based Closure.
- An IM Report Hexavalent Chromium Treatment for the AOC-2 Old Treatment Plant Area, dated January 2007, documented conversion of hexavalent chromium to trivalent chromium and included results of soil samples taken beneath the Former Process Area. Arsenic remains a constituent of concern (COC).
- WPI submitted a Work Plan – Demonstration Testing for the Biological Degradation of Soil and Groundwater, dated November 7, 2007, for the SWMU-1, Closed Surface Impoundment. This Work Plan was conditionally approved by DEQ in letter dated December 19, 2007. The DEQ issued final approval in letter dated April 11, 2008.
- WPI submitted a Drilling Scope of Work, dated April 24, 2008, for the AOC-2, Old Process Area. On May 20, 2008, the DEQ granted approval for installation of air sparge wells to conduct testing so that an Interim Measures (IM) Design and Work Plan can be prepared to remediate groundwater for polycyclic aromatic hydrocarbons (PAHs) in AOC-2, Old Process Area, which includes the old treating plant building.
- On June 30, 2008, WPI submitted an Initial Progress Report and Operations and Maintenance Manual dated June 26, 2008, for Demonstration Testing for the Biodegradation of Soil and Groundwater for the Closed Surface Impoundment - Solid Waste Management Unit (SWMU) 1. The DEQ reviewed the documents and issued a no comment letter dated August 12, 2008.
- On September 8, 2008, WPI submitted a Revised Risk-Based Closure Demonstration, dated September 4, 2008, for SWMU 2, the Closed Spray Evaporation Pond.

- On November 19, 2008, the DEQ issued a comment letter requesting WPI to revise the Risk-Based Closure Demonstration submittal for SWMU 2, the Closed Evaporation Pond, to address and meet the DEQ's itemized response comments. The risk-based closure demonstration submittal addressed industrial receptors only. The DEQ advised the facility that residential receptors and drinking water standards (MCLs) and ground water protection standards (GPS) are required to be achieved for the regulated unit under the Post-Closure plan and CO.
- On November 3, 2008, WPI submitted an Interim Measure Work Plan Addendum for groundwater treatment at the AOC 2, Old Process Area, dated October 31, 2008. The DEQ reviewed the Work Plan Addendum for AOC 2, and issued a comment letter, dated December 5, 2008, requesting WPI to revise the Work Plan.
- On March 18, 2009, WPI submitted a response to comments to the DEQ's December 5, 2008 letter. On May 21, 2009 DEQ correspondence, the DEQ considered the WPI's response to comments adequate and requested a revised Work Plan Addendum for AOC 2.
- On May 20, 2009, a meeting was held between the DEQ and WPI to discuss the regulatory matters regarding the facility.
- On May 21, 2009, the DEQ presented WPI with a letter, dated May 21, 2009 discussing the DEQ's recommendation to the groundwater monitoring program.

Details and supporting documentation regarding the above can be obtained by reviewing the files at DEQ's Central Office or by contacting the DEQ project manager 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 2005. The 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, CA725, dated September 16, 2003. 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 site contained in the Groundwater Environmental Indicators (GWEI) Determination Report, CA750, dated September 27, 2002. The above GWEI 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 within the "existing area of contaminated groundwater." In support of the EI process, the facility is currently attempting to demonstrate a risk-based closure for SWMU No. 1, the Closed Spray Evaporation Pond, to meet closure performance standards for soils for this closed RCRA Unit. This EI determination is considered current, effective July 7, 2009.

Contaminants

The predominant soil and groundwater contaminants are chromium, arsenic, chrysene, benz(a)anthracene, acenaphthene, fluorene, 2,4-dinitrotoluene, and pyrene.

Institutional Controls

A Consent Order (CO) was issued by the Commonwealth of Virginia, DEQ, to the facility owner with an effective date of September 30, 1994. The CO was modified in 1998 to include the requirements of a Post-Closure Plan. The CO and Post-Closure Plan were issued in lieu of issuing a Post-Closure Permit to the facility.

A Facility Lead Agreement (FLA) was signed between WPI and EPA on August 9, 2002 to conduct CA investigations and necessary cleanup activities at the facility. The DEQ has been delegated by the EPA as lead agency for oversight of the FLA.

Deed Notices are recorded which identify the location of surface impoundments that have been closed as landfills with waste closed in place under the CO.

Community Involvement

The facility printed a public notice on March 12, 2003 in the *Northern Neck News*, stating that Wood Preservers is conducting a study of its facility in accordance with the RCRA CA Program. The public notice invited the public to review all pertinent information regarding the study.

A document repository has been established at the following location:

Richmond County Library
Rappahannock Community College, Warsaw Campus
52 Campus Drive, Warsaw, VA 22572
Phone: (804) 333-6710

Documentation may be reviewed during normal operating hours.

Government Contact

The Virginia DEQ is the lead CA regulatory 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

Ms. Angela Alonso
Department of Environmental Quality
629 East Main Street
Richmond, VA 23219
Phone: (804) 698-4328
e-mail: Angela.Alonso@deq.virginia.gov

For more information about the EPA corrective action program, including Environmental

Indicators, please visit the EPA website at: www.epa.gov/reg3wcmd/correctiveaction.htm

Facility Contact

Mr. William M. Wright, CEO
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Warsaw, VA 22572
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Email: mwright@woodpreservers.com

Fact Sheet Update

The Fact Sheet was previously updated January 2009. The next update is scheduled for January 2010. Previous fact sheets may be obtained through the DEQ contact.