

Region 3 GPRA Baseline RCRA Corrective Action Facility

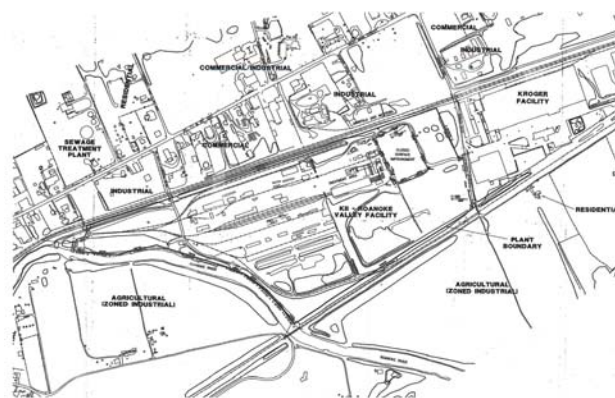
Koppers Industries, Inc.

(Beazer East, Inc.)

4020 Koppers Road
Salem, Virginia 24153
Congressional District 9
EPA ID No.: VAD003125770
Last Updated 07/07/2009



Facility Location Map
(Scale: 1 inch = 3,200 ft approx.)



Facility Site Plan
(Scale: 1 inch = 1,600 ft approx.)

Current RCRA CA Activities

The Virginia Department of Environmental Quality (DEQ) is the lead agency for oversight of RCRA Corrective Action (CA) work at the facility. The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of Post-Closure Permit (Permit) issued to the facility.

In September 1996, the Virginia DEQ issued a Post-Closure Permit pursuant to the Resource Conservation and Recovery Act (RCRA) to administer post-closure hazardous waste activities at the facility.

In September 1998, the EPA issued a Permit for Corrective Action and Waste Minimization, which identified solid waste management units (SWMUs) and areas of concern (AOC) at the facility. The Corrective Action Permit requires CA investigation of releases from the SWMUs and AOCs, and corrective action remediation, if necessary.

In 2000, the DEQ was granted authorization by the EPA to administer CA under the Hazardous

and Solid Waste Amendments (HSWA) of the Resource Conservation and Recovery Act (RCRA) of 1984. Effective October 2000, the DEQ became the lead agency for CA at the facility with EPA providing technical support.

The DEQ issued a modification of the facility's Permit on September 2002, which required the installation of three sentinel wells to replace three off-site wells (M-28, M-29A, and M-29C), which were inadvertently destroyed and subsequently abandoned.

A revised RCRA Facility Investigation (RFI) Work Plan was submitted by Beazer East, Inc. to the EPA and the DEQ. The revised RFI Work Plan was approved by the DEQ on July 31, 2002. Field work associated with Phase I of the RFI Work Plan was conducted in September-October 2002.

The draft RFI Report was submitted to the DEQ on September 24, 2003.

The facility completed an initial Groundwater Tracer Study and Electronic Groundwater Monitoring Study, dated March 3, 2004, using multiple non-toxic dyes. The dye trace study findings were inconclusive.

By letter dated September 19, 2005, the DEQ requested that Koppers/Beazer submit a RCRA Permit Application, Part A and B, to renew its Post-closure Permit by March 29, 2006. The facility requested that the DEQ use its full time allotment in reviewing the permit application to enable the addition of a corrective measure for the regulated unit and incorporation into the facility's reissued Post-Closure Permit.

By letter dated September 30, 2005, the DEQ provided comments on the groundwater aspects and site characterization of the submitted RFI Report.

By letter dated October 21, 2005, Koppers submitted responses to DEQ's comments on the RFI Report, wherein they proposed the second dye-trace study. Additionally, the facility proposed to discuss the remainder of the DEQ's comments subsequent to the submittal of the results from the second dye-trace test. The DEQ agreed with the facility proposal.

The facility completed the second Groundwater Tracer Study and Electronic Groundwater Monitoring Study, dated April 6, 2007, using non-toxic dyes, to obtain additional information concerning the hydrogeologic relationship between the site aquifer, springs, seeps, creeks, and the Roanoke River. The dye study findings concluded that contaminants were contained on-site.

On April 28, 2006, the DEQ received the facility's Permit Application, Part A and B, to renew its Post-Closure Permit.

The Post-Closure and CA Permit was reissued and became effective October 28, 2007, and remains in effect until October 28, 2017. The DEQ deferred the regulated unit groundwater monitoring to site-wide corrective action groundwater monitoring.

On March 7, 2008, DEQ submitted comments on the 2003 RFI and requested that soil data be screened against residential screening numbers and soil leaching numbers and a proposed path forward be proposed.

On June 16, 2008, the DEQ received the rescreening results from the RFI investigation and the Response to DEQ Comments – RFI Report by Arcadis on behalf of Beazer in response to the DEQ's comments on March 7, 2008. The supplemental information provided in the above submittal enabled the DEQ to complete the review of the RFI Report, dated September 2003, as amended. The submittal also included a proposal for a Phase II RFI and comprehensive site risk assessment.

On August 5, 2008, a meeting was held with facility representatives to discuss the supplemental information submitted for the RFI Report and to discuss the general nature and details of the proposed site characterization and future risk assessment under the forthcoming Phase II RFI Work Plan.

On September 11, 2008, the DEQ sent correspondence formally approving the RFI Report as a Phase I RFI. The correspondence additionally requested the facility to submit a Phase II RFI Work Plan within 90 days of receipt of the approval letter.

On December 18, 2008, the DEQ received a Phase II RFI Work Plan and Risk Assessment Work Plan. On January 29, 2009 the DEQ responded with correspondence requesting additional details specifically related to the comprehensive site-wide risk assessment and waste management practices (NOD, 1/29/2009).

On April 30 2009, the DEQ received, via electronic transmission, a response to DEQ comments. The response also included a Phase II RCRA Facility Investigation Work Plan, an updated QAPP, and a revised Risk Assessment Work Plan. . The submittal is under review.

Site Description

The Koppers, Inc. (KI) facility is located approximately 2.0 miles west of the City of Salem in Roanoke County. It was operated by Koppers Company, Inc. from 1955 to 1988.

The facility occupies 85 acres on the north bank of the Roanoke River, which borders the facility property to the west and south. The Norfolk and Southern Railroad line runs in a northeast to southwest direction along the northern edge of the property. East of the facility, the Kroger Company owns and operates a warehouse and distribution center.

The facility produces treated wood products using creosote to pressure treat railroad cross ties, bridge timbers and crossing panels. The wood is treated by pressure injection of a creosote solution, which is the only preservative that has been used since the plant began operations.

Corporate ownership was restructured between 1988 and 1990. On November 14, 1988, BNS, Inc., a wholly owned subsidiary of Beazer PLC, completed the purchase of Koppers Company, Inc. On December 28, 1988, the Roanoke Valley Plant was purchased by Koppers Industries, Inc., a new and independent company. On January 26, 1989, the name of Koppers Company, Inc. was changed to Beazer Materials and Services, Inc. On April 16, 1990, the name of Beazer Materials and Services, Inc. was changed to Beazer East, Inc. (BEI). Under the terms of the purchase agreement, Beazer remained the operator of the closed surface impoundments and retained certain responsibilities for site related impacts that preceded the date of sale. Koppers Industries, Inc. continued to operate the plant, later changing its name to Koppers, Inc. in March 2003. KI is the current owner and operator and is corporately independent of Beazer. Pursuant to the agreement to sell the property, BEI retained responsibility for pre-sale environmental conditions, and KI took responsibility for post-sale environmental conditions. BEI has retained lead responsibility for implementing CA clean-up activities under the RCRA.

RCRA CA Milestones

The following RCRA CA milestones have been completed at this facility:

- An RFI Work Plan was approved by DEQ on July 31, 2002.
- Field work associated with Phase I of the RFI Work Plan was conducted in September-October 2002.
- The RFI Report was submitted to the DEQ for review in September 2003.
- The DEQ sent the facility the RFI Report review comments, dated September 30, 2005, requesting additional investigation.
- On September 28, 2007, the DEQ reissued the new Hazardous Waste Management Post Closure and Site-Wide Corrective Action Permit; the Permit became effective October 28, 2007, and expires October 28, 2017. The DEQ deferred the regulated unit monitoring to site-wide monitoring.
- On March 7, 2008, the DEQ sent the facility additional RFI Report review comments requesting additional soil screening in accordance with the facility Permit.
- On June 16, 2008, the DEQ received the rescreening results from the RFI investigation and the Response to DEQ Comments – RFI Report by Arcadis on behalf of Beazer in response to the DEQ's comments on March 7, 2008. The supplemental information provided in the above submittal enabled the DEQ to complete the review of the RFI Report, dated September 2003, as amended. The submittal also included a proposal for a Phase II RFI and comprehensive site risk assessment.

- On September 11, 2008, the DEQ sent the correspondence, dated September 11, 2008, with formal approval of the RFI Report as a Phase I RFI. The facility is to submit a Phase II RFI Work Plan within 90 days of receipt of the approval letter.
- On December 18, 2008, the DEQ received a Phase II RFI Work Plan and Risk Assessment Work Plan. .
- On January 29, 2009 the DEQ sent a Notice of Deficiency requesting additional detail in the Risk Assessment Work Plan and Phase II RFI Investigation Work Plan.
- On April 30 2009, the DEQ received a response to DEQ comments. The response also included a Phase II RCRA Facility Investigation Work Plan, an updated QAPP, and a revised Risk Assessment Work Plan. . The submittal is under review.

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

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, CA725, dated September 2004. The DEQ will require Koppers to implement interim measures (IMs) for all areas where human exposures are found not to be under control. 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 Groundwater Environmental Indicators (GWEI) Determination Report, CA750, dated September 2004. 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." Results of ongoing groundwater monitoring at the facility indicate that, although contaminated

Contaminants

The primary contaminants in the groundwater and soils at the facility are polycyclic aromatic hydrocarbons (PAHs) and volatile organic compounds (VOCs). Results of ongoing groundwater monitoring at the facility indicate that, although contaminated groundwater has migrated past the facility boundary, there has been no change in the size of the plume over the last several years.

Institutional Controls

In September 1996, the Virginia DEQ issued a Post-Closure Permit pursuant to the Resource Conservation and Recovery Act (RCRA) to administer post-closure hazardous waste activities and require post-closure care, groundwater monitoring, and CA. The Post-Closure and CA Permit was reissued, with an effective date of October 28, 2007; this Permit requires post-closure care, groundwater monitoring, and CA.

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

Community Involvement

A copy of all documents related with the Post-Closure and CA Permit and the RCRA CA activities at this facility are available for viewing at the DEQ's Central Office located at 629 East Main Street in Richmond, Virginia. The DEQ maintains a facility mailing list that is used to inform the public of substantial CA and Permit action issues regarding the facility.

Government Contacts

The Commonwealth of Virginia DEQ is 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.

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For more information about EPA's corrective action program, including Environmental Indicators, please visit our site at: www.epa.gov/reg3wcmd/correctiveaction.htm

Fact Sheet Update

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