

## **Region 3 GPRA Baseline RCRA Corrective Action Facility**

# **Continental Teves, Inc.**

**13456 Lovers Lane  
Culpeper, VA 22701  
Congressional District 7  
EPA ID #: VAD030341077  
Last Updated: 07/07/2008**

## **Current RCRA CA Activities**

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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). This facility is one of EPA Region III's high priority RCRA corrective action sites.

The CA investigations and any necessary clean up activities at the facility were initiated at the facility in accordance with the conditions and requirements of a Hazardous Waste Management Post-Closure Permit issued to the facility by the DEQ, with an effective date of October 30, 2002, for the former industrial wastewater lagoon (surface impoundment) and two sludge drying beds, which were closed as a hazardous waste landfill with wastes closed in place.

The Commonwealth of Virginia conducted an Environmental Indicator (EI) inspection at this facility and determined that additional information needed to be gathered in order to determine if the EIs have been met.

On October 10, 2000, a RCRA Corrective Action Permit was issued to the facility to investigate Solid Waste Management Units (SWMUs) identified during the EI inspection and previous investigations/assessments of the facility.

An RFI Workplan was submitted, as required by the CA Permit, on March 7, 2001. To facilitate corrective action progress, the field portion of the Workplan was approved by letter dated February 25, 2002. The remainder of the Workplan was approved in its entirety on April 11, 2003.

The facility's Post-Closure Permit was modified to incorporate the requirement to continue to operate the pilot air-sparging system. The modification was completed on September 30, 2002. On August 8, 2003, modification to the Post-closure Permit was issued to include Module VII and Source Area Removal of VOCs, which was incorporated as a HSWA interim measure.

On January 21, February 9, and March 10, 2005, Continental Teves, Inc. (CTI) requested a Class

2 permit modification for the abandonment of post-closure monitoring wells MW-4, MW-12, and RCRA Facility Investigation (RFI) wells MW-21 through MW-25; transfer of 3 wells to the mobile pumping/treatment system influent line (MW-9, MHW-3, and MW-45); rerouting of the water from extraction well MW-28 to the Chromium Removal System (CRS) for additional treatment (this was required as Chromium (Cr) has exceeded the maximum contaminant levels (MCLs) in well MW-28); and the change of the treatment media in the CRS from Metall:X to granular activated carbon (GAC). On June 2, 2005, DEQ requested additional information before a final decision can be made on the permit modification request.

On January 21, 2005, CTI requested a permit modification to remove the requirement to record the water level measurement from the sounding tube, which is located adjacent to the Chromium extraction well, and not to include it as an additional item in the quarterly report. On June 6, 2005, DEQ approved a Class 1 permit modification for this request.

On March 25, 2005, CTI submitted an application to renew its Post-Closure Permit.

The draft Post-Closure Permit was sent to EPA on June 14, 2006.

On May 9, 2006, a Class 2 permit modification was approved to allow CTI to abandon/reinstall MW-4, MW-12, and MW-21 through MW-25, to transfer three additional wells to the mobile pumping/treatment system influent line, and to change the Chromium (Cr) Treatment Removal System (CRS) from Metall:X to granulated activated carbon (GAC).

On July 7, 2006, the draft Post-Closure Permit was sent to CTI.

On July 11, 2006, a public hearing was held regarding the draft Post-Closure Permit renewal.

On August 25, 2006, CTI submitted comments on the draft Post-Closure Permit.

DEQ and CTI made significant changes to the draft Post-Closure Permit during 2007. On June 22, 2007, an updated draft Post-Closure and Corrective Action Permit was sent to CTI for review.

The public comment period for the draft Post Closure and Corrective Action Permit renewal was from July 16, 2007 through August 30, 2007. A public hearing was held on August 15, 2007.

The Post Closure and Corrective Action Permit was reissued on September 20, 2007. The HSWA corrective action requirements under 40 CFR 264.101 is included within the above Permit and includes the remediation of volatile organic compounds (VOCs) from groundwater by air sparging and remediation of chromium and VOCs from groundwater by groundwater extraction. The DEQ has replaced the post-closure care groundwater monitoring requirements of the regulated unit with alternative requirements under the authority of 40 CFR 264.110(c) and 40 CFR 264.90(f). The groundwater contaminant plume beneath the site will be monitored as described in the DEQ's approved Groundwater Sampling Program.

The DEQ and CTI worked together to develop a site-wide Groundwater Sampling Program that will effectively evaluate groundwater conditions at the facility. The DEQ approved the Groundwater Sampling Program on August 7, 2007.

The DEQ and CTI provided responses and comments on the RFI Report dated April 2003.

On June 20, 2008, CTI submitted a final revised RFI Report. The revised RFI Report is currently in the DEQ review and approval process.

## **Site Description**

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Prior to 1972, the land use for this property was farmland. The facility has been at this location since approximately 1972, and was originally built by Westinghouse for manufacture of wastewater treatment plant equipment. Alfred Teves subsequently purchased the building and grounds, and the original building was refitted to begin manufacturing of automotive brake and suspension components.

The Alfred Teves automotive manufacturing operations began in the spring of 1976. From approximately 1978 to 1982, Koni Company concurrently operated a shock absorber manufacturing operation in the main building. The facility has subsequently operated under several additional names; ITT Teves, ITT Automotive, and the current name, Continental Teves, after the facility was purchased by Continental AG of Germany in September of 1998. Present use of the facility is the manufacture of brake components for various automobile makers.

## **RCRA CA Milestones**

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See description above under Current RCRA CA Activities.

## **Environmental Indicator Status**

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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.

The current evaluation of Environmental Indicators for this facility is as follows:

- *Human Exposures Controlled Determination:* Based upon information submitted, Human Exposures have been determined to be Under Control as of September 16, 2004. This HHEI determination is considered current, effective July 7, 2008.
- *Release to Groundwater Controlled Determination:* Based upon information submitted, Groundwater Releases have been determined to be Under Control as of September 16, 2004. This GWEI determination is considered current, effective July 7, 2008.

## **Contaminants**

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The primary contaminants in soil and groundwater at the facility are chromium and chlorinated solvents and their breakdown products.

## **Institutional Controls**

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A Hazardous Waste Management Post-Closure Permit was issued to the facility by the DEQ with an effective date of October 30, 2002, for a former industrial wastewater lagoon (surface impoundment) and two sludge drying beds, which were closed as a hazardous waste landfill with wastes closed in place.

The Hazardous Waste Management Post Closure and Corrective Action Permit was reissued on September 20, 2007. The above Permit requires post-closure care, groundwater monitoring, and corrective action.

A Deed Notice is in place identifying the location of the former wastewater lagoon and two sludge drying beds closed with waste in place as a hazardous waste landfill.

## **Community Involvement**

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A copy of all documents related with the Hazardous Waste Management Post-Closure and Corrective Action Permit at this facility are available for viewing at the DEQ's Central Office located at 629 East Main Street, Richmond, Virginia.

## **Government Contacts**

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The DEQ is the lead authority for this CA 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. Trisha Johnson  
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### **EPA Project Manager**

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## **Facility Contact**

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For more information about EPA corrective action webpage, including Environmental Indicators, please visit our site at: [www.epa.gov/reg3wcmd/correctiveaction.htm](http://www.epa.gov/reg3wcmd/correctiveaction.htm)

## **Fact Sheet Update**

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The previous fact sheet was updated January 2008. The next update is scheduled for January 2009. Previous fact sheets may be obtained through the listed contacts.