

Cook Composites and Polymers Co.

Hwy #29 Tight Squeeze Industrial Park

Chatham, VA 24531

Congressional District No. 5

EPA ID No. VAD055046049

Last updated: 07/07/2009

Current RCRA CA Activities

RCRA Corrective Action (CA) activities at the Cook Composites and Polymers (CCP) facility are being conducted under the direction of the Virginia Department of Environmental Quality (DEQ). The CA investigations and any necessary clean up activities are being implemented in accordance with the conditions and requirements of CCP's Hazardous Waste Management Permit (Permit) for CA under the CA modules and attachments. The facility's current Permit was reissued, effective September 27, 2006, under the Virginia Hazardous Waste Management Regulations (VHWMR), which incorporates the requirements of the RCRA Regulations by reference.

The contaminated subsoil and groundwater that remained at the CCP from solid waste management units (SWMUs) and areas of concern (AOCs) releases have been investigated under the RCRA Facility Investigation (RFI) and such contaminated subsoil and groundwater are being remediated under the requirements of the facility's CA Permit. Remediation of contaminated subsoil and groundwater are being implemented as necessary to protect human health and the environment in accordance with the requirements of the facility's Permit, the VHWMR, the RCRA, and applicable State Laws and Regulations.

On November 29, 2007, URS submitted a revised *Final Phase II RFI Report*, dated November 2007, incorporating all applicable DEQ comments generated during the review process. The DEQ provided approval of the above *Final Phase II RFI Report*, in correspondence dated May 5, 2008.

Summary of Final Phase II RFI Report Findings

The text, tables, and figures from the submitted components of the *Final Phase II RFI Report*, dated March 2006 and November 2007, provide documentation of the real extent and depths of the contamination found in the surface soils, subsoils, groundwater, sediments, and surface waters at the CCP site during the phase II RFI.

Information in the *Final Phase II RFI Report* provides information from the following submittals: 1) *Verification Investigation Report*, dated June 4, 1999, 2) *Phase II RFI Report*,

dated December 2003, 3) *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, and 4) *Surface Soil Sampling and Evaluation Results Report*, dated January 28, 2005.

The surface soils, subsoils, sediments, and groundwater that are impacted by the past releases of HCOCs from the facility is limited in size to an area of approximately 500 ft. x 600 ft. and to a depth of approximately 40 ft. below grade. Contamination is localized to the facility property based upon the investigation findings. The area with the highest concentrations of HCOCs in the subsoils and groundwater is limited to an area of approximately 200 ft. x 300 ft. The groundwater table is typically 20 to 25 ft below the ground surface in the areas showing the highest levels of contamination at the site.

The summary findings and details of the *Final Phase II RFI Report* indicate that the existing contamination at the CCP site primarily includes VOCs and SVOCs in the subsoils and groundwater at the CCP site. The risk assessment evaluations have also indicated that inorganics contribute to the potential risks to human health in addition to the VOCs and SVOCs.

In the areas of highest contamination, the subsoils and groundwater HCOCs primarily include, but are not limited to the following: xylene, ethylbenzene, acetone, toluene, benzene, methyl-ethyl ketone (MEK), methyl-isobutyl ketone (MIBK), styrene, 2-hexanone, chloroform, acetophenone, phenol, dicyclopentadiene (DCPD), and phthalates. Manganese, thallium, and iron have been identified as risk-driver HCOCs in the groundwater at the site and the elevated levels of the above inorganic constituents has been attributed to the reduced conditions caused by the organic HCOCs present.

As presented in the *Final Phase II RFI Report*, dated November 2007, Sample Area 5 requires further corrective action. CCP has proposed the remediation in Sample Area 5 using In-Situ Chemical Oxidation (ISCO) technology. On August 3, 2006, a meeting was held at the DEQ, where CCP and URS representatives presented an interim measure (IM) proposal and submitted an *IM Proposal Workplan*, dated August 2006. The IM is proposed to be implemented first as a Pilot Study, and then is proposed to be expanded to remediate the entire Sample Area 5 subsoils and groundwater. CCP and URS were advised that the DEQ staff needed to complete the review of the *Final Phase II RFI Report* prior to completing the review of the *IM Proposal Workplan* and providing review comments and/or a recommendation of approval of the *IM Proposal Workplan*.

Effective January 5, 2007, the DEQ project manager, risk assessment staff, and groundwater staff, completed the review of the *IM Proposal Workplan*. A risk assessment technical review comments memorandum, dated November 2, 2006, and a groundwater technical review comments memorandum, dated December 28, 2006, has been developed for the *IM Proposal Workplan*.

It should be noted that in accordance with the facility's Permit, IMs may be implemented at any time during the term of the Permit to reduce or eliminate potential risk to human health or the

environment, or to prevent or reduce the spread of contamination. Thus, an IM may be implemented at the end of the RFI.

On December 19, 2007, the DEQ conditionally approved the Pilot Test Work Plan component of the *IM Proposal Workplan*. Instead of an interim measure, the DEQ considered that a pilot test would move the project forward as the facility awaits approval of its *Final Phase II RFI Report*.

CCP submitted revised Health and Safety Plan (HASP) on April 17, 2008, and a *Revised Pilot Test Work Plan* was submitted on May 5, 2008, for the use of ISCO technology at its site. Both documents addressed the conditions identified in the DEQ's conditional approval letter, dated December 19, 2007. Therefore, the *Revised Pilot Test Work Plan* was approved on May 27, 2008. Start-up of the Pilot Test ISCO system began around mid-June 2008. The pilot test is currently operational at the CCP facility.

After approval of the *Final Phase II RFI Report* on May 5, 2008, CCP had ninety (90) days to submit to the DEQ, a *Corrective Measures Study (CMS) Work Plan*, as referenced in CCP's Permit. CCP submitted *CMS Work Plan* on August 8, 2008.

The DEQ completed its review and provided approval of the *CMS Work Plan* on March 24, 2009.

During implementation of the pilot test, CCP collected data and monitored the effectiveness of the system, and prepared a Pilot Test Report. CCP has submitted a *2008 Pilot Test Report* on June 4, 2009. It is currently undergoing review by the DEQ staff. The *Pilot Test Report* will be incorporated into the *CMS Report*.

The *CMS Report* will be the primary basis for a corrective measures remedy selection for the CCP site, if needed. The alternative and proposed corrective measure remedies will undergo public notice and public meetings to receive comments in accordance with Permit requirements. The preferred corrective measures remedy will be established and implemented to protect human health and the environment and will also be based upon other criteria which includes, but is not limited to: long and short term effectiveness and performance of the remedy, reduction of toxicity, mobility, or volume of contamination, technical feasibility, cost, and acceptance by CCP, the State, the EPA, and the Community.

It must be stated that the goal of CA under the VHWMR, the RCRA, and the State Water Control Law is to restore degraded resources (soils and groundwater, etc.) to levels which are protective of the most beneficial use.

Other potential future CA activities, if needed, may include a *Corrective Measures Implementation Work Plan*, the *Corrective Measures Design*, and *Corrective Measures Construction*.

Site Description

The Cook Composite and Polymers (CCP) facility in Chatham, Pittsylvania County, Virginia occupies approximately 101 acres of property in the Tight Squeeze Industrial Park. The CCP facility is located in Pittsylvania County that is the Piedmont physiographic province of south-central Virginia. The Banister River is located approximately 1,200 ft south of the CCP facility. Unnamed tributaries to the Banister River run just south of the CCP processing site. The environmental setting and updated site specific information is fully described in the *Phase II RFI Report*, dated November 2007.

The CCP facility primarily produces unsaturated polyester resins for use in the manufacture of fiberglass boats, bathroom fixtures, sinks, and related specialty composite products.

RCRA CA Milestones

- July 8, 1996 – The DEQ issued a Hazardous Waste Management Permit for storage and treatment of hazardous waste to CCP located in Chatham, Virginia.
 - The above Permit included Corrective Action (CA) permit conditions and requirements as necessary to protect human health and the environment. The CA permit conditions required the CCP facility to investigate and address all releases of hazardous waste or hazardous constituents from the facility, regardless of the time the release occurred.
- October 1996 – CCP completed a Screening Investigation (SI) to determine whether releases to the environment had occurred from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). Based on the results from the SI, and in accordance with the requirements of their Permit, CCP performed a more focused investigation, which was called a Verification Investigation (VI). Under the VI, samples were taken of the soils, subsoils, groundwater, sediment, and surface water to determine the nature and extent of contamination on site.
- June 4, 1999 – A *VI Report* was submitted to the DEQ for review and approval.
- July 12, 2001 – The DEQ provided conditional approval of the VI Report. This conditional approval required CCP to submit a RCRA Facility Investigation (RFI) Work Plan to the DEQ for approval to further investigate and report on the nature and extent of the releases at the Chatham facility.
 - Requirements for the RFI were specified in the DEQ correspondence dated July 26, 2001, September 20, 2001, and September 28, 2001. The RFI is necessary to comply with the requirements of the DEQ and the EPA.
 - The RFI Work Plan requirements include additional sampling of soils, subsoils, groundwater, sediment, surface water, and stormwater from sample areas identified as requiring further investigation. Data from sampling and testing of the above media would undergo a risk assessment and would be evaluated for the potential impacts to human health and the environment.

- In addition, the RFI would include engineering and hydrogeologic evaluations of the existing engineered control measures already in-place at the facility. The existing engineered control measures were installed at this facility under the authority of the State Water Control Board (SWCB) under a previous Special Order and Release Agreement issued to Freeman Chemical Corporation in 1981 and 1982, respectively. (CCP has owned and operated the former Freeman Chemical facility since 1990.) The existing engineered control measures (remediation measures) include the following: two groundwater pump and treat systems, soil removal actions, and the installation of an engineered landfill cap over a large area at the site which showed past soil and groundwater contamination. These measures were summarized in the 1999 VI Report.
- The RFI evaluations of the existing engineered control measures would establish whether additional corrective action or remediation measures are needed to minimize migration of contaminants from soils to groundwater, and groundwater to surface water and/or sediments. The potential impact of the contaminant migration to surface waters and nearby wetlands would be more fully assessed and evaluated under current conditions.
- January 8, 2002 – A *Phase II RFI Work Plan* was submitted to the DEQ.
 - The DEQ's review comments were provided to CCP by correspondence, dated September 30, 2002. A revised Phase II RFI Work Plan was submitted to the DEQ by CCP on November 27, 2002. On March 31, 2003, the DEQ provided conditional approval of the *Phase II RFI Work Plan*, contingent upon submittal of correspondence and a Phase II RFI Work Plan Addendum, which addressed the DEQ's itemized comments in the conditions of approval.
- September 10, 2002 – CCP submitted a *Flow-Through Process Tank Replacement Work Plan*. (This work plan is considered by the DEQ to a component part of the facility's revised *Phase II RFI Work Plan*.)
 - The DEQ considers the work in this project as an interim measure (IM) subject to CA oversight as the underground flow-through process tanks were co-located with solid waste management unit (SWMU) No. 26, the tank farm drain system, and SWMU No. 27, the tank farm sump. SWMU No. 26 drains to SWMU No. 27. Sample data from SWMU No. 27 has shown past evidence of groundwater contamination and a release of HCOCs to the environment.
 - The DEQ provided CCP with review comments of this IM Work Plan by correspondence dated December 20, 2002. A *Flow-Through Process Tank Replacement Work Plan – Revision 1*, dated February 21, 2003, was submitted by CCP.
- March 31, 2003 – The DEQ provided CCP conditional approval of the *Flow-Through Process Tank Replacement Work Plan – Revision 1*. Items of the conditional approval were specified in this DEQ correspondence.
- May 19, 2003 – CCP correspondence was submitted to the DEQ to provide clarification and/or a response to each item of the DEQ's conditional approval of the *Flow-Through Process Tank Replacement Work Plan*. The DEQ provided CCP with correspondence, dated June 27, 2003, to further clarify requirements of the DEQ's conditional approval of this IM

Work Plan. The tank removal activities associated with this IM were scheduled to begin in June 2003, contingent upon completion of the installation of the new process tanks. The site investigation evaluations, data, and findings during the IM tank removal activities were to be included in the evaluations, risk-assessment, and findings of the RFI Report.

- May 21, 2003 – A *Phase II RFI Work Plan, Revision 2* was submitted to the DEQ.
 - The above revised Work Plan and correspondence addressed the agency's itemized comments in the DEQ's conditional approval, dated March 31, 2003.
- Spring-Summer, 2003 – The CCP facility's Hazardous Waste Management Permit underwent a Class 2 permit modification to incorporate the CA permit modules and attachments under the Hazardous and Solid Waste Amendments (HSWA) of the RCRA.
 - The permit modification request underwent a public notice mailing and a publication in a major local newspaper, and a public meeting was held in accordance with the requirements of the RCRA Regulations. The Permit's CA modules and attachments outline the plan for further action and provide specific detailed requirements for the evaluation of the nature and extent of releases at the Chatham facility. The Permit CA modules and attachments require a complete human health and ecological risk-assessment associated with the releases at the site.
- September 19, 2003 – The permit modification was approved by the DEQ.
- June 27, 2003 – CCP was sent a confirmation letter and comments regarding their submitted correspondence and the *Phase II Work Plan, Revision 2* by the DEQ.
 - The RFI Report was scheduled to be submitted to the DEQ within 180 days of the DEQ's confirmation letter. The *Phase II RFI Report* was initially scheduled to be submitted on December 24, 2003.
- November 20, 2003 – The DEQ sent correspondence to CCP which suggested that the CCP facility request an extension of the previously scheduled RFI Report submittal date beyond December 24, 2003. The DEQ had believed that the extension of the RFI Report submittal date was appropriate due to some outstanding unresolved issues of the RFI Work Plan associated with the completion of the facility's site-specific risk assessment. The above DEQ correspondence provided CCP with technical review comments regarding an air dispersion model submitted in CCP correspondence, dated August 26, 2003. The above DEQ correspondence also addressed some outstanding information pertaining to the historical operation of the incinerator at CCP which needed to be submitted and reviewed by the DEQ.
 - The detailed information regarding the air dispersion model and the historical operation of the hazardous waste incinerator at CCP was required to establish the following for the RFI: 1) the air deposition soil sample areas and locations and, 2) the HCOCs for this soil sampling initiative. Information on the air dispersion model and the historical operation of the incinerator are components of the RFI Work Plan were required to be submitted to the DEQ for approval. CCP was requested to submit information on the above two items within 30 days of receiving the DEQ's correspondence, dated November 20, 2003. Information on the above two items was subsequently submitted by CCP in the URS

submittal, dated January 5, 2004.

- December 23, 2003 – A *Phase II RFI Report*, dated December 2003, was submitted by correspondence from the URS Corporation, in accordance with the initial RFI Report schedule.
- January 5, 2004 – URS Corporation submitted correspondence and information for CCP for the outstanding items of the *Phase II RFI Work Plan*, which included: the air dispersion model, the surface soil sampling locations, and the facility's supporting basis and rationale for the soil sampling constituents or hazardous constituents of concern (HCOCs) from the 40 CFR Part 261, Appendix VIII, hazardous constituents list.
- January 15, 2004 – In DEQ's correspondence, CCP was informed that the submitted *Phase II RFI Report* submittal would not be considered the *Final RFI Report* as the submitted Report did not include all of the RFI information in accordance with the facility's Permit and the approved RFI Work Plan. The above submitted *Phase II RFI Report* was missing investigation elements of the RFI, the report findings of the *Flow-Through Process Tanks Replacement Work Plan-Revision 1*, dated February 21, 2003, an RFI interim measure (IM) investigation, and the full human health and ecological risk assessment. The findings from this above IM Report are to be included in the *Final RFI Report*.
- Spring of 2004 – CCP notified the DEQ of their intent to close the permitted tank storage system and the incinerator hazardous waste management units (HWMUs).
 - The facility's 1996 Permit authorized the storage and treatment of ignitable and listed hazardous waste (D001 and F003 waste codes) in tanks and treatment by incineration in the facility's on-site incinerator. The practice of incinerating solvent hazardous wastes at the on-site incinerator ceased in 2000. In 2003 and 2004, CCP modified their manufacturing processes to replace the xylene azeotropic solvent with a nitrogen sparge system. The practice of incinerating esterification water at the facility's on-site incinerator ceased on March 16, 2004.
- March 31, 2004 – The DEQ sent CCP correspondence which provided the technical review comments and a Notice of Deficiency (NOD) for the CCP submittal, dated January 5, 2004, regarding the air dispersion model, the surface soil sampling locations, and the facility's supporting basis and rationale for the soil sampling constituents or HCOCs. CCP was required to resubmit a revised Work Plan with information to address the items delineated in the NOD letter and the enclosed NOD memorandum within 45 days of receipt of the DEQ's correspondence.
- May 5, 2004 – URS Corporation submitted the *Flow-Through Process Tank Replacement Report*, dated May 4, 2004.
- May 6, 2004 – The DEQ sent correspondence to CCP which advised CCP that a newly identified solid waste management unit (SWMU), a septic tank and drain field, was identified by the DEQ staff during a file search of the DEQ files. This file search was related with the ongoing RFI and the review of the historical administrative record regarding the URS/CCP submittal, dated January 5, 2004, regarding the surface soils sampling initiative under the

Phase II RFI Work Plan. CCP was advised of the nature and extent of the investigation that was needed for this newly identified SWMU. CCP was instructed to provide documentation of the investigation findings regarding this new SWMU in the forthcoming Final RFI Report.

- May 21, 2004 – URS Corporation submitted the *Surface Soil Sampling and Evaluation Plan* in response to the DEQ's NOD issued March 31, 2004.
 - The *Surface Soil Sampling and Evaluation Plan* is considered a component part of the *Phase II RFI Work Plan – Revision 2*, dated May, 2003. The above submitted Plan contains essential information regarding the facility's final elements of the RFI Work Plan which were outstanding for this facility. The RFI Work Plan elements include the following: 1) information regarding the air dispersion model to model air emissions from the facility's current incinerator, 2) the surface soil sampling locations based upon the above model, 3) the background surface soil sampling locations, 4) the HCOCs for this sampling and testing initiative, 5) the analytical test methods and detection limits, and 6) the statistical methods and risk assessment evaluations of products of incomplete combustion (PICs) (dioxins and furans), if found in the surface soils.
- August 5, 2004 – The DEQ provided the conditional approval of the *Surface Soil Sampling and Evaluation Plan*, dated May 21, 2004. The *Surface Soil Sampling and Evaluation Report* submittal was scheduled to be submitted in January 2005. This above Report is considered a component part of the forthcoming *Final RFI Report*.
- September 29, 2004 – The DEQ provided disapproval of the submission of the *Flow-Through Process Tank Replacement Report*, dated May 4, 2004. The DEQ provided technical and administrative review comments in attached memorandums. The DEQ's comments regarding the above submittal also provided CCP with information regarding needed revisions and/or references in the forthcoming *Final RFI Report* submittal.
- December 10, 2004 – The URS Corporation submitted the *Flow-Through Process Tanks Replacement Report – Revision 1*, dated December 2004, in response to the DEQ comments of September 29, 2004.
- January 28, 2005 – URS submitted correspondence and provided the DEQ with the *Surface Soil Sampling and Evaluation Results Report*, dated May 21, 2004. The above submitted Report was in response to the DEQ's conditional approval of the submitted Work Plan, by letter dated August 5, 2004. The submitted information in the above Report contained essential information and final elements needed for completion of the *Final RFI Report*.
- May 10, 2005 – CCP submitted to the DEQ a *RCRA Closure Plan Implementation Report* (Closure Report), dated May 10, 2005 after completing closure activities of the permitted tank storage system and incinerator hazardous waste management units (HWMUs) under its Permit.
 - During closure activities, soils adjacent to the Incinerator/Tank Storage System Building were investigated and contamination of the soils and subsoils was discovered due to some past releases from the tank storage system vents. Contaminated soils and sub-soils resulting from releases from the permitted HWMUs were excavated so to meet the

“clean-closure” risk-based performance standards. The contaminated soils were disposed off-site at permitted facilities in accordance with the requirements of the VHWMR.

- June 14, 2005 – The DEQ’s technical review comments from the risk assessment and groundwater staff had been sent to the CCP facility to enable CCP to continue to develop the *Final RFI Report*. Effective January 2005, the submitted *Phase II RFI Report* had undergone technical review and staff comments have been developed for: 1) risk assessment elements and the risk assessment’s consistency with the *Phase II RFI Work Plan – Revision 2*, dated May 2003, and 2) the environmental setting and groundwater results.
- September 15, 2005, the DEQ sent CCP correspondence and attached memorandums with the remaining technical review comments from the DEQ’s staff regarding the *Phase II RFI Report* (Report), dated December 2003. CCP was advised that this Report was not considered the *Final Phase II RFI Report* as it did not include all of the RFI information in accordance with the facility’s Permit and the approved RFI Work Plan. A *Final Phase II RFI Report* was initially scheduled to be submitted to the DEQ within 90 days of receiving the DEQ’s comments.
 - Information in the *Final Phase II RFI Report* was to include summary and detailed information of the text, tables, and figures from the following submittals: 1) *Verification Investigation Report*, dated June 4, 1999, 2) *Phase II RFI Report*, dated December 2003, 3) *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, and 4) *Surface Soil Sampling and Evaluation Results Report*, dated January 28, 2005. The consolidation of information from the above four Reports would provide a comprehensive *Final Phase II RFI Report*, which would help facilitate the review and evaluation of the RFI findings, summaries, and conclusions.
- December 2, 2005 – CCP submitted correspondence which requested a 90-day extension for the completion of the *Final Phase II RFI Report* due to comprehensive revisions to the *Phase II RFI Report*, dated December 2003, and the consolidation and summary of multiple reports into a *Final Phase II RFI Report*.
- December 9, 2005 – The DEQ approved a 90-day extension for the submittal date of the *Final Phase II RFI Report* to March 21, 2006.
- March 17, 2006 – A *Final Phase II RFI Report*, dated March 2006, was submitted to the DEQ along with URS correspondence, responding to the DEQ’s correspondence, dated September 15, 2005.
- June 8, 2006 – The *Final Phase II RFI Report* has undergone a detailed administrative and technical review by the DEQ staff. CCP and URS were sent DEQ correspondence, with the technical review comments regarding the risk assessment and statistical review of the above submitted Report and regarding consistency issues with the *Work Plan, Revision 2 – Phase II RFI Volume 1 of 2*, dated May 2003. CCP was requested to provide appropriate written responses to the DEQ regarding the above itemized technical review comments by July 31, 2006.
- July 28, 2006 – URS submitted correspondence, with itemized responses to the DEQ’s risk

assessment and statistical review comments provided by DEQ correspondence, dated June 8, 2006.

- August 3, 2006 – A meeting was held at the DEQ, where CCP and URS representatives presented an interim measure (IM) proposal and submitted an *IM Proposal Workplan*, dated August 2006
- August 29, 2006 – The DEQ's groundwater staff completed the review of the *Final Phase II RFI Report* and provided review comments by memorandum.
- September 6, 2006 – The DEQ risk assessment staff developed a response memorandum, dated, in response to the URS response, dated July 28, 2006.
- September 22, 2006 – The DEQ sent CCP correspondence to provide the Director's approval of the certification of closure and the approval of the *RCRA Closure Plan Implementation Report*, dated May 10, 2005 (Closure Report), and the supplemental information submitted by URS Corporation on June 1, 2006, July 13, 2006, and August 30, 2006, to clarify information within the Closure Report and to enable the staff to complete the human health risk assessment evaluation for closure of the HWMUs.
- January 5, 2007, the DEQ project manager, risk assessment staff, and groundwater staff, completed the review of the *IM Proposal Workplan*. A risk assessment technical review comments memorandum, dated November 2, 2006, and a groundwater technical review comments memorandum, dated December 28, 2006, was developed for the *IM Proposal Workplan*.
- April 5, 2007 – DEQ correspondence was sent to CCP to provide the DEQ's enclosed technical review comments regarding the *Final Phase II RFI Report*, dated March 2006. The DEQ has found that the *Final Phase II RFI Report* submittal has, for the most part, adequately addressed the DEQ's correspondence, dated September 5, 2005, and the technical review comments from the DEQ staff regarding the *Phase II RFI Report*, dated December 2003.
- May 25, 2007 – URS correspondence provided the response to the DEQ's technical review response comments regarding the *Final Phase II RFI Report*, dated March 2006. The URS response letter includes a revised *Final Phase II RFI Report*, Appendix G, Screening Level Ecological Risk Assessment (SLERA), and other attachments to address the staff's comments. URS indicated that republication of the full *Final Phase II RFI Report* would be deferred until all comments by the DEQ have been resolved.
- September 14, 2007 – The DEQ provided response comments regarding URS correspondence, dated May 25, 2007. This correspondence provided the DEQ's remaining technical review comments regarding the *Final Phase II RFI Report*, dated March 2006. The above URS response comments, reviewed by the DEQ's risk assessment staff, groundwater staff, and the project manager have, for the most part, been found satisfactory and enables URS to republish the full *Final RFI Report*.
- November 29, 2007 – URS submitted a revised *Final Phase II RFI Report*, dated November

2007, incorporating all applicable DEQ comments generated during the review process.

- December 19, 2007 – The DEQ conditionally approved the Pilot Test Work Plan component of the *IM Proposal Workplan*.
 - CCP submitted revised Health and Safety Plan (HASP) on April 17, 2008 and a *Revised Pilot Test Work Plan* for the use of ISCO technology at its site, on May 5, 2008. Both documents addressed the conditions identified in the DEQ's conditional approval letter, dated December 19, 2007.
- May 5, 2008 – The DEQ provided approval of the *Final Phase II RFI Report*, dated November 2007.
- May 27, 2008 – The DEQ provided approval of the *Revised Pilot Test Work Plan*.
- August 8, 2008 – CCP submitted *CMS Work Plan, dated August 2008*.
- March 24, 2009 – The DEQ provided approval of the *CMS Work Plan, dated August 2008*.
- June 4, 2009 – CCP submitted its *2008 Pilot Test Report*.

Details and the supporting documentation regarding the above can be obtained by reviewing the 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 CA facilities by the year 2005. The CCP facility falls under the GPRA CA initiative and is considered a high priority facility by the EPA.

EPA is evaluating two key environmental indicators (EI's) for each facility: 1) Current Human Exposures under Control, and 2) Migration of Contaminated Groundwater under Control. 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." This determination is based upon the DEQ's Current Human Health Environmental Indicator (HHEI) Determination Report, dated April 20, 2005. The above HHEI determination is considered current effective July 7, 2009.
 - The findings in the *Phase II RFI Report*, dated December 2003, the *Flow-Through Process Tank Replacement Report – Revision 1*, dated December 10, 2004, and the *Surface Soil Sampling and Evaluation Results Report*, dated January 28, 2005, indicate that the current Human Health Exposures Under Control EI determination for the CCP facility should be a "YES" status for the (HHEI) (RCRIS code (CA725)). This "Yes" status indicates that there are no identified unacceptable current human exposures to contamination in excess of appropriate risk-based levels that can be reasonably expected

under current land-use and groundwater-use conditions and with the current control measures in place (for all contamination subject to RCRA corrective action (CA) at or from the identified facility (i.e., site-wide)).

- *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, dated September 25, 2003. This 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 within the "existing area of contaminated groundwater." The above EI determination is considered current effective July 7, 2009.

Contaminants

The summary findings and details of the *Final Phase II RFI Report* indicate that the existing contamination at the CCP site primarily includes VOCs and SVOCs in the subsoils and groundwater at the CCP site. The risk assessment evaluations have also indicated that inorganics contribute to the potential risks to human health in addition to the VOCs and SVOCs.

In the areas of highest contamination, the subsoils and groundwater HCOCs primarily include, but are not limited to the following: xylene, ethylbenzene, acetone, toluene, benzene, methyl-ethyl ketone (MEK), methyl-isobutyl ketone (MIBK), styrene, 2-hexanone, chloroform, acetophenone, phenol, dicyclopentadiene (DCPD), and phthalates. Manganese, thallium, and iron have been identified as risk-driver HCOCs in the groundwater at the site and the elevated levels of the above inorganic constituents has been attributed to the reduced conditions caused by the organic HCOCs present.

Institutional Controls

The current Permit for CA was issued by the DEQ and became effective on October 30, 2006, and shall remain in effect until October 30, 2016. The Permit contains site-wide CA requirements under the VHWMR and RCRA.

Community Involvement

As part of the Community Relations Plan (CRP), required under CCP's permit, an information repository has been established at the Chatham Public Library, located at 24 Military Drive, Chatham, Virginia, 24531. The library is within 3.5 miles of the CCP facility. The phone number for the Chatham public library is (434) 432-3271. The information repository provides

public access to interim documents and fact sheets, as well as final copies of work plans and technical reports related with CA at the CCP site.

In addition to the above, procedures are established in the CA Permit modules and attachments to provide public notice, public mailings, and public meetings at critical decision points in the CA process. The public notice, mailings, and meetings were held during the Class 2 Permit modification effective September 19, 2003, to inform the public of the CA process, the RFI, and the IM for this facility. CA fact sheets for the RFI and the IM at the facility were provided to the public in mailings and at the public meeting. The executive summary in the RFI Report was mailed to citizens and agencies on the facility's public mailing list upon approval of the RFI Report by the DEQ.

In addition to the above, the CCP facility's Hazardous Waste Management Permit (Permit) For CA was reissued, effective September 27, 2006, under the VHWMR and the RCRA Regulations. The public notice of the draft permit for CA and a public hearing was published in the *Danville Register & Bee* on August 2, 2006, and broadcast on WAKG-FM 103.3 Radio in Danville, Virginia on August 7, 2006. A public hearing was held on September 7, 2006, at 7:00 PM, at the Chatham Middle School, Chatham, Virginia. The public comment period for the draft permit ended on September 22, 2006. The DEQ received no comments expressing the opinion that the DEQ should deny the Permit for reissuance for the CCP facility.

Since corrective measures are necessary at the CCP site, a CMS Report will be submitted to the DEQ for approval and the EPA Region 3. A corrective measures remedy selection will be based upon the alternative remedies presented and evaluated in the CMS Report. The corrective measures remedy will undergo public notice and public meetings in accordance with Permit requirements. Public comments will be considered in the selection of a final remedy for the CCP site. Future CA fact sheets will be developed, as believed needed.

In an effort to get the community more involved, CCP has published its newsletter – CCP Sustainable (most currently – January 2009), and has set-up a Community Advisory Committee (CAC) where community members have an opportunity to learn about aspects of the plant's activities that affect their health and environment and give input that can influence company's decisions. The last CAC was held on April 28, 2009. The next CAC meeting is scheduled on October 27, 2009. The meetings are now being scheduled twice a year.

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For more information about EPA's corrective action programs, including Environmental Indicators, please visit: <http://www.epa.gov/epaoswer/hazwaste/ca>

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Fact Sheet Update

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