



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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SUBJECT: Stella-Jones Corporation (formerly Wood Preservers Inc.)
15939 Historyland Highway, Warsaw, Virginia 22572
EPA ID: VAD003113750
Long Term Stewardship Assessment

DATE: 09/16/2021

FROM: Ryan Kelly
RCRA CA Project Manager

TO: File for Stella-Jones Corporation (formerly Wood Preservers Inc.)
VDEQ Office of Remediation Programs

Remedy Review Summary:

DEQ's Final Corrective Active Remedy Decision (Final Decision and Response to Comments document dated July 31, 2017) required the facility to conduct long-term groundwater monitoring at Areas of Concern (AOCs) 1 and 2, continue to implement the post-closure care program and groundwater monitoring at Solid Waste Management Units (SWMUs) 1 and 2, and implement institutional and engineering controls. The controls include restricting groundwater use from beneath the property, residential use prohibition, prohibit disturbance of and maintain soil covers over AOC 1 and SWMU 1 and the engineered cover over SWMU 2. Compliance reporting to DEQ is also required (as requested) as part of the final remedy.

On September 19, 2017, Wood Preservers, Inc. recorded an environmental covenant with the Richmond County Circuit Court to establish land use controls.

Document Review:

The last RCRA Corrective Measures Implementation Status Report submitted by the Facility and dated November 2, 2017 was reviewed which provided a summary of completed corrective measures and groundwater results since 2010. The Report concluded that active corrective measures were no longer necessary and included a request to discontinue groundwater monitoring and abandon the groundwater monitoring wells. Correspondence from DEQ dated November 29, 2017 and January 16, 2018 provided

concurrence that the active remedial measures and groundwater monitoring could be discontinued. In addition the January 16, 2018 letter issued by DEQ provided concurrence that the RCRA Post Closure Care period for SWMUs 1 and 2 had been completed and RCRA Corrective Action was complete (with continued controls).

The most recent aerial image of the Facility (Google Earth May 2021) indicates that property has continued its use as a wood treatment facility and there is no change/disturbance to the restricted SWMUs/AOCs.

The Environmental Covenant is available on EPA's webpage for the Facility along with the Statement of Basis for Final Remedy. Covenant restrictions are summarized in the Table below. The current owner is Stella-Jones Corporation.

Background:

The Facility occupies approximately 132 acres located in Warsaw, Virginia. Wood Preservers Inc. 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. Historically, pentachlorophenol was used at the former treating area of the facility between 1975 and 1983. Creosote and chromate copper arsenate (CCA) were also used as wood preservatives at the former treating area. Presently, the wood is preserved using a CCA process containing Dricon, which is a fire retardant for which boron is the primary ingredient. The facility uses pressurized treating cylinders and vacuum system to apply the CCA preservative solution.

DEQ approved an Interim Corrective Measures Design Report on May 1, 2015, for implementation of interim measures to address soil and groundwater contamination within AOC 1 and AOC 2, the former treatment building and cylinder areas, and SWMU 1, the former surface impoundment. Interim measures included in situ stabilization of contaminants in soil and injection of "FerroBlack" into groundwater for stabilization of inorganic contaminants. Interim measures were completed in 2016. Subsequently, the corrective action final remedy decision was issued on July 31, 2017, which includes institutional and engineering controls and periodic groundwater monitoring. An environmental covenant, which meets requirements of the Uniform Environmental Covenants Act and established land use controls, was executed on September 19, 2017.

Documents Reviewed:

EPA Region 3 Corrective Action Sites Webpage - Facility Fact Sheet
VDEQ FDRTC (07/31/2017)
Environmental Covenant (09/19/2017)
CMI Status Report (11/2/2017)
VDEQ correspondence letters (11/29/2017 and 01/16/2018)
Google Earth imagery (05/02/2021)

Table 1: Institutional Control/Engineering Control
Corrective Action Remedy Summary

| | | | | |
|--|--|----|-------------------------------|---|
| Facility Name | Stella-Jones Corporation (formerly Wood Preservers Inc.) | | | |
| Address | 15939 Historyland Highway, Warsaw, VA 22572 | | | |
| EPA ID Number | VAD003113750 | | | |
| Are there restrictions or controls that address: | Yes | No | Area(s) | Description of restrictions, controls and mechanism |
| Groundwater Use | X | | Entire Facility | Prohibit the use of groundwater beneath the property for potable and sanitary purposes to support selected corrective measures. |
| Residential Use | X | | Entire Facility | Entire Facility shall not be used for residential purposes or for children's daycare facilities, schools, or playground purposes. |
| Excavation | X | | SWMUs 1 and 2 AOCs 1 and 2 | Any earth moving activities within SWMUs 1 and 2 and AOCs 1 and 2 shall comply with the Materials Management Plan. |
| Vapor Intrusion | | X | | |
| Capped Area(s) | X | | SWMUs 1 and 2 AOCs 1 | Prohibit disturbance of and maintain soil covers over AOC 1 and SWMU 1 and the engineered cover over SWMU 2. |
| Other Engineering Controls | | X | | |
| Other Restrictions | | X | | |