



*Commonwealth of Virginia*

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September 15, 2023

Mr. Oliver Kuttner  
Virginia Castings Industries LLC  
1500 Fourth Avenue  
Cadillac, MI 49601  
Olibor1@aol.com

**VIA ELECTRONIC MAIL**

RE: **Long Term Stewardship Report**  
**Archer Creek Foundry**  
EPA ID VAD000820506

Dear Mr. Kuttner:

The Virginia Department of Environmental Quality, Office of Remediation Programs (VDEQ) has prepared the attached report following the Long-Term Stewardship inspection performed on June 14, 2023 at the Archer Creek Foundry site located in Lynchburg, Virginia. The inspection found no outstanding items with compliance of engineering and institutional controls as defined within the 2018 Uniform Environmental Covenant Act (UECA)-compliant covenant. However, please note that additional investigation and/or engineering and/or institutional controls may be necessary for areas of the site located outside of the boundaries identified in the 2018 UECA covenant if those areas are proposed for redevelopment beyond commercial and/or industrial use as required by the 2016 Final Remedy for the site. Please also note that the 2016 Final Remedy stated that contaminants above Industrial Risk-Based Screening levels may still exist onsite and within the boundaries defined within the UECA covenant.

You may contact me to discuss any questions. I can be reached at 804-584-3143 or by e-mail at [stephanie.houston@deq.virginia.gov](mailto:stephanie.houston@deq.virginia.gov).

Respectfully,



Stephanie Houston  
Corrective Action Project Manager

ECC: Tara Mason– VDEQ-CO

Nikki Herschler, Nicole Tilley – VDEQ-BRRO

Jacqueline Morrison, Alizabeth Olhasso, Kristin Korancai – USEPA Region III

Attachments



**Long-Term Stewardship Assessment Report  
Archer Creek Foundry  
(VCI Lynchburg Foundry)  
EPA ID VAD000820506**

Prepared by: Stephanie Houston

Date: September 15, 2023

**Remedy Review Summary**

The engineering and institutional controls selected and defined within the 2018 UECA covenant are implemented and remain intact and undamaged. The Long Term Stewardship Assessment revealed that the Final Remedy Decision for the Facility required certain Activity and Use Limitations for the Entire Facility, of which portions of the site were not included in the 2018 UECA covenant. Given current development activities, potential development options, locations where development may occur, and areas incomplete implementation of the final remedy, additional actions will need to be taken so that the final remedy is fully implemented. If development opportunities beyond commercial/industrial use are being considered within the Facility boundary (i.e., residential use or recreational use), the Facility will need to provide demonstration that risks to human health and the environment are acceptable for those intended uses. Changes to the CA725 and CA800 status codes are also being considered given changes to activities onsite. Finally, the Facility should be aware that contaminant concentrations above Industrial-Based screening levels might be present onsite and there is uncertainty concerning the type, extent, and concentration of contaminants remaining onsite in both the 2018 UECA covenant-defined areas and outside those areas.

**Introduction:**

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be observed. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in two-fold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

The RCRA Corrective Action Program has identified key elements of effective Long-Term Stewardship for Corrective Action cleanups. The LTS Report took into consideration the following elements while preparing this report:

Element 1 – Legal Authorities

Element 2 – Information Regarding Engineering and Institutional Controls

Element 3 – Long-Term Facility Oversight, Monitoring, and Maintenance

Element 4 – Recordkeeping and Tracking

Element 5 – Meaningful Engagement and Consultation

Element 6 – Funding

Element 7 – Enforcement

Element 8 – Enforceable Mechanisms

Element 9 – Dedicated Resources

### **Site Background:**

The Archer Creek facility (Facility) is located at 1132 Mt. Athos Road, Campbell County, near Lynchburg, Virginia. The approximately 193-acre property was formerly owned and operated by Internet Corporation. A large portion of the 193 acres is comprised of undeveloped wooded land. The former foundry currently consists of large concrete slabs delineating the locations of former structures, a few derelict structures, two closed solid waste landfills, and elements of the wastewater treatment system. The Facility is located in a mainly industrial use area; however, a few residential properties are located in the general area. The 2007 RCRA site visit report indicated that the closest residential home is located approximately 2,500 feet from the facility.

The Facility was once a large manufacturing plant comprised of a casting foundry (formerly referred to as the Small Castings Foundry), warehouse and associated asphalt parking lot, rail spurs, roadways, and landscaped areas. The Facility manufactured metal parts for automobiles, heavy trucks, small internal combustion engines, computers, industrial tools, and household appliances. Manufacturing began in 1973, and activities included mainly melting and casting of metal parts with some limited machining and painting. The property was owned and operated as a foundry by Lynchburg Foundry, LLC, an entity owned by Internet Corporation, from approximately 1973 to December 2009 when operations ceased. During this time, Internet filed for bankruptcy in August 2008. The property was sold to Virginia Casting Industries, LLC in May 2010. That company never operated the foundry. The foundry was demolished beginning in September 2010 with demolition complete by the end of May 2011. When the facility was owned and operated by Lynchburg Foundry Company, it was referred to as the Archer Creek Plant.

Numerous hazardous chemicals, non-hazardous chemicals, and petroleum products were historically used during the manufacturing process. The raw chemicals and petroleum products were stored in small aboveground storage tanks (ASTs), 55-gallon drums, and carboys. The hazardous and non-hazardous wastes generated at the facility were stored in ASTs, 55-gallon drums, carboys, and small containers pending disposal/treatment.

Foundry production wastes were formerly disposed at the on-site landfills or the off-site Falwell landfill until the landfills were full. After the landfills were full, the foundry production wastes

were disposed in commercial and local landfills. A review of the disposal records by the Facility indicates that off-site disposal began in February 2002 with some on-site disposal continuing until October 2002. Two permitted landfills were located onsite. The Northwest Landfill Area (Permit #347, SWMU 5) was closed in 1985 by capping, grading, and re-vegetating. The Closed Landfill (Permit #456, SWMU 3) was closed in 2009 and is currently in post-closure care. The Facility should coordinate with VA DEQ Solid Waste Program to determine outstanding Post Closure Care requirements.

A 2007 Site Report by the USEPA Region 3 evaluated the potential releases from site Solid Waste Management Units (SWMUs) and Areas of Concerns (AOCs). In addition to acknowledging the possible sources of releases to air, surface water, groundwater, and soil identified in the Final RCRA Facility Assessment (FA) completed in June 1989, the Site Report noted additional possible sources of contamination. Stormwater historically and still discharged into the James River and Archer Creek at the time of the report, and the report also noted that “ACF is aware of discharge ‘issues’ concerning toxicity (Bioassay testing) with two of the outfalls”. In its description of exposure pathways, the report stated that hazardous wastes and raw chemicals were stored in containers of good integrity and in secure, protected locations; however, a majority of the SWMUs were located on unpaved surfaces, providing no pathway control to groundwater and underlying soils. Finally, the Site Report included additional details about the site, including that select portions of the facility were surrounded by a chain-link fence and that groundwater was being used as a potable water supply.

### **Current Site Status:**

The foundry facility no longer exists, and evidence of previous operations has been removed excepting the concrete slab of the former foundry building, the remaining out-buildings, the closed industrial landfill, and the unused wastewater treatment system. However, the Final Decision and Response to Comments (FDRTC) document dated October 21, 2016 notes that **historical soil and groundwater data suggest that both may contain contamination above Industrial Risk-Based Screening Levels, and there are no current data that supersedes the historical data.** Lack of additional investigation/data might have been due to the lack of a responsible party with the bankruptcy of the Owner (Intermet) and the subsequent dissolution of the LLC that purchased the site (Virginia Casting Industries, LLC), and thus a lack of resources for additional investigation. DEQ therefore made the determination that activity and use limitations (AULs) would be protective for current and future anticipated land use.

To achieve multiple threshold and balancing criteria, including long-term effectiveness, the final remedy required implementation of institutional and engineering controls through an environmental covenant pursuant to the Virginia Uniform Environmental Covenants Act (UECA), §10.1-1238 et seq. of the Code of Virginia. Virginia Casting Industries LLC as the owner of the property entered into an UECA-Compliant Environmental Covenant with VDEQ as “The Agency” on February 13, 2018, which has been recorded with the deed for the property. However, only two areas within the Facility (Landfill Area and Former Archer Creek Foundry Area) were included in the UECA covenant. The final remedy has not been applied to areas outside of the UECA covenant-defined areas, including the Northwest Landfill Area (SWMU-5),

the Wastewater Treatment System (SWMU-8), Scrap Metal Storage Area (SWMU-38), Industrial Water Treatment Plant (SWMU-40), and Former Oil Tank Farm (SWMU-41), among others.

Current RCRA status codes are CA725YE (Current Human Health Environmental Indicator), CA750YE (Current Migration of Groundwater), and CA800YE (Ready for Anticipated Reuse) for the area designated as “Entire Facility” for all codes. Notes in the “Rationale and Reference” section of the Environmental Indicator (EI) determination documents for CA725 and CA750 indicate the uncertainty of contaminant concentrations that remain onsite. The CA725 document states, “There is no documented historical or ongoing soil or groundwater contamination, however given the historical use of the property, surficial soil contamination of heavy metals is possible. VDEQ’s Final Remedy for the site consists of controls restricting access and qualifiers requiring soil sampling prior to development.” However, the EIs are based on current use and exposures, and therefore were only applicable at the time they were prepared based on “vacant use”. The CA750 document states, “The FA concluded that one or more of the SWMUs present at the ACF facility may be affecting groundwater quality at the facility based on a review of the limited groundwater sampling data for the facility... There is no documented historical or ongoing groundwater contamination.”

Since the closure of the foundry, the Facility has been used as vehicle storage and is currently being used for the storage and distribution site of steel materials, auto parts collection, and auto repair.

### **Element 1: Legal Authorities**

The Final Remedy Decision was issued under the authority of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 and 6992k. Institutional controls defined within the remedy for two areas (Foundry Area and Landfill area) were implemented through the UECA-compliant Environmental Covenant recorded on February 13, 2018. In addition, the landfill area defined within the UECA is also under a Solid Waste permit (#456), which was originally issued on January 10, 1985 and remains active. The landfill area entered post-closure care on April 27, 2009. The UECA serves as the authority for enforcing the final remedy at the Facility. DEQ is listed as the Agency in the Covenant.

### **Element 2: Information Regarding Engineering and Institutional Controls**

The following controls were described in the 2018 UECA covenant as part of the CA remedy and are specific to the Former Archer Creek Foundry Area and Landfill Area.

Associated Area	Restriction
Former Archer Creek Foundry Area  Landfill Area	1. All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on the Landfill Area and associated

Associated Area	Restriction
	<p>sedimentation basins shall be prohibited without Agency approval of a Materials Management Plan.</p> <p>2. The Property shall not be used for residential purposes unless it is demonstrated to the Agency that such use will not pose a threat to human health or the environment and the Agency provides prior written approval for such use. "Residential purposes" as used herein shall mean and include any improvement, structure or swelling used for living accommodations (single or multi-family occupancy, including, without limitation, detached housing, condominiums, apartment buildings, dormitories and senior citizen housing); day care facility (whether for infants, children, the infirm or elderly); and any nursing home facility.</p> <p>3. Groundwater shall not be used for potable purposes unless it is demonstrated to the Agency that such use does not pose an unacceptable risk to human health and the Agency provides prior written approval for such use.</p>

The following controls are required by the remedy:

- All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on those portions of the Facility associated with the **closed landfills and associated sedimentation basins** shall be prohibited without VDEQ approval of a Materials Management Plan.
- The **Facility property** shall not be used for residential purposes unless it is demonstrated to VDEQ that such use will not pose a threat to human health or the environment and VDEQ provides prior written approval for such use. "Residential purposes" as used herein shall mean and include any improvement, structure or dwelling used for living accommodations (single or multi-family occupancy, including, without limitation, detached housing, condominiums, apartment buildings, dormitories, and senior citizen housing); any day care facility (whether for infants, children, the infirm, or the elderly); and any nursing home facility.
- Groundwater shall not be used for potable purposes unless it is demonstrated to VDEQ that such use does not pose an unacceptable risk to human health and VDEQ provides prior written approval for such use.
- To **minimize potential trespasser exposure** to site-related inorganic soil contaminants, the **existing fence must be maintained** by the then-current owner of the property (the 2018 UECA covenant later stated that the "existing fence" referenced in the activity and use restrictions in the final remedy is no longer present and may not have been present when the Statement of Basis and FDRTC were issued. Accordingly, there is no existing fence to be maintained).

Based on the site visit and discussions with the owner, there is interest in possible development outside of the areas associated with the 2018 UECA covenant. Please note the controls required for the Entire Facility boundary remain an obligation under the Corrective Action Program; therefore, additional engineering and institutional controls may be necessary outside of the areas defined in the 2018 UECA covenant.

### **Element 3 – Long-Term Facility Oversight, Monitoring and Maintenance**

The UECA Covenant requires that, by the end of March, 2019 and the end of every fifth March thereafter, the then current owner of the Property shall submit to the Agency written documentation stating whether or not the activity and use limitations in this environmental covenant are being observed. The next report is due March 31, 2024. In addition, within one (1) month after any of the events listed in Section 5(b) of the Environmental Covenant, the then current owner of the Property shall submit to the Agency written documentation describing the event.

A small portion of the Facility on the western edge is located within the 0.2% Annual Chance Flood Hazard Area as indicated on [FEMA's National Flood Hazard Layer \(NFHL\) Viewer](#). Remedies are therefore possibly susceptible to climate impacts based on these flood criteria.

### **Element 4 – Recordkeeping and Tracking**

The UECA covenant and Final Remedy provide visual representation of the activity and use limitations.

**Mapping:** The EPA Facility website figure has been updated with a Geospatial PDF showing the use restriction boundaries based on the 2018 UECA covenant. The map was field-verified and no issues were noted. However, the only areas depicted in the Geospatial PDF where controls have been implemented are the areas labeled “Former Archer Creek Foundry Area” and “Landfill Area” using coordinates provided in the UECA. Controls have not been applied to the entire facility boundary that is depicted in the PDF, and as such, additional controls are required for the “Entire Facility” (which includes the “Former Archer Creek Foundry Area”) and “Landfills and associated sedimentation basins”.

### **Element 5 – Meaningful Engagement and Consultation**

The Facility has active operations, and it has no off-site impacts. The Statement of Basis was publicly noticed on September 18, 2016 in the New & Advance newspaper for 30 days. The public notice was also placed on September 19, 2016 on the DEQ web page and ended on October 19, 2016. EPA accepted the requested revisions to the remedy language in the 2016 FDRTC. The owner has also engaged with local businesses to use the Facility to facilitate and expand their businesses.

### **Element 6 – Funding**



A 2007 RCRA Site Visit Report listed an internal VDEQ memorandum dated August 28, 1998 that acknowledged closure of hazardous waste management units with the approved risk-based closure plan and recommended release of the Facility from financial assurance for RCRA waste pile closure for the Facility. Financial Assurance for Corrective Action was not required for the Facility since the remedy involved only institutional and engineering controls.

### **Element 7 – Enforcement**

EPA, without limitation, reserves its right to take administrative enforcement action under RCRA or other federal law for violations. The UECA covenant provides additional enforceability for the Grantor and the Agency.

### **Element 8 – Enforceable Mechanisms**

An UECA-Compliant Environmental Covenant was recorded on February 13, 2018. A Solid Waste Permit (#456) was issued by VDEQ on January 10, 1985 and is still in effect.

### **Element 9 – Dedicated Resources**

The Performance Partnership Grant Workplan provides for Long-Term Stewardship activities. The Programmatic goal is to evaluate 20% of facilities with remedies older than 10 years.

### **Long-term Stewardship Site Visit: On June 14, 2023**

DEQ conducted a long-term stewardship site visit to discuss and assess the status of the implemented remedies at the site. A field report is included with this letter. It was noted that the rail line is being used again to transport steel materials to the site, and materials (e.g., rail ties, dumpster) were observed next to the railroad and outside of the area defined within the 2018 UECA covenant.

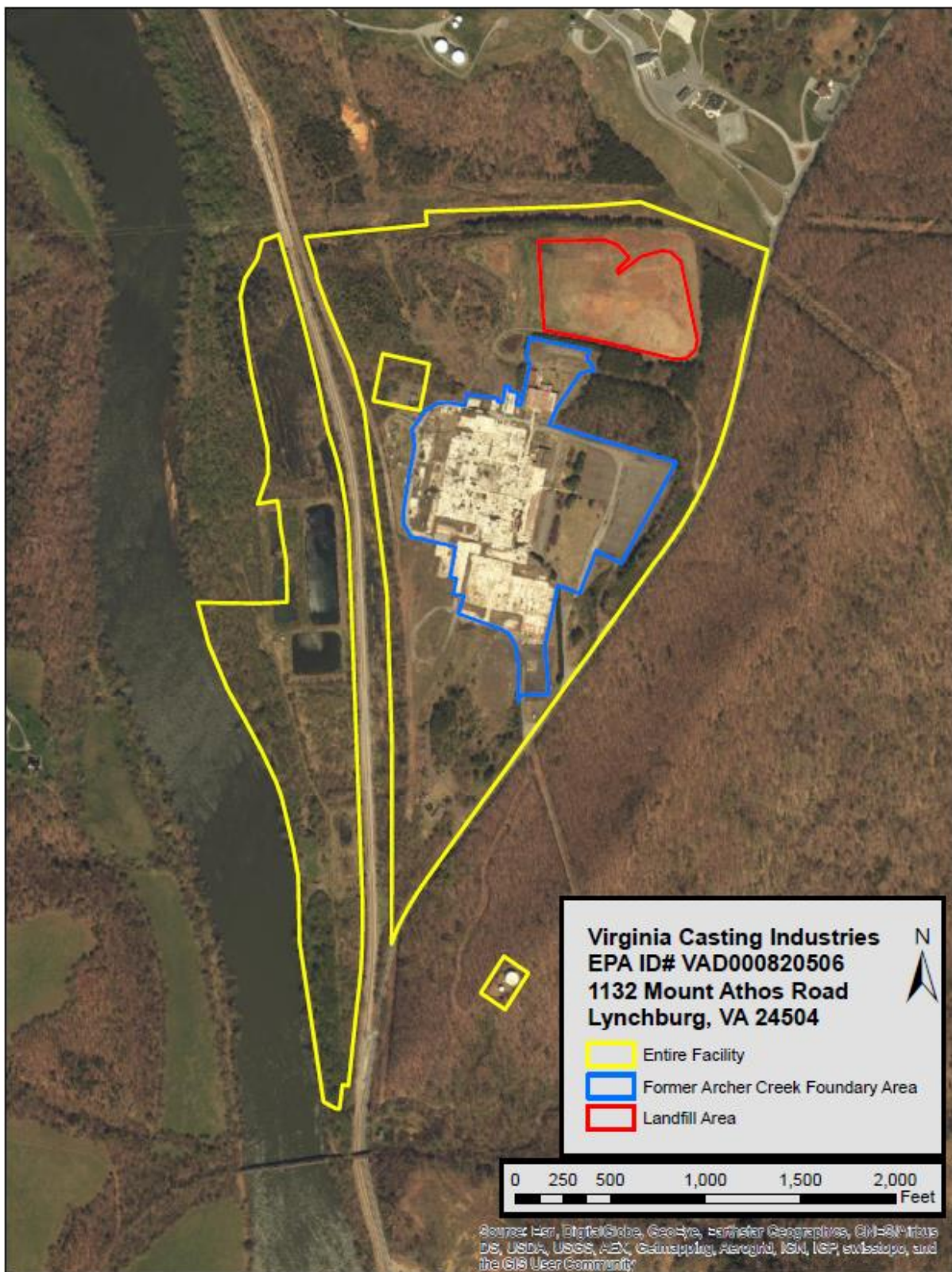
During the visit, development possibilities were discussed for the Former Foundry Area, Landfill Area, and areas outside of the boundaries defined in the UECA covenant, including the riverbank area. Development possibilities for the landfill included a concert venue site, parking area, and solar farm. Development possibilities for the Former Foundry Area included a condominium/ideospace for businesses and an aluminum extraction facility. Development possibilities for the riverbank area included wetland development and a recreational area. Development possibilities for other areas included residential housing.

### **Follow-up Activities:**

The UECA five-year report is due next year on March 31, 2024. VDEQ has alerted the owner of this deadline. The following additional items are being revisited as a result of the LTS Evaluation:

1. Revisit the CA725 (Current Human Health Environmental Indicator). The current CA725 status code is CA725YE (Yes, Current Human Exposures are Under Control), yet was completed based on the understanding that the property was vacant. Given current development activities and potential development options, the status of the CA725 is being revisited. The CA725YE status code may also change, which would affect the status of CA800 (Ready for Anticipated Use Determination).
2. Changes to the CA800 status are also being considered. The current CA800 status code CA800YE (Yes, Ready for Anticipated Use) applies to the Entire Facility; however, the 2018 UECA covenant applies the final remedy only to the Landfill Area and Former Archer Creek Foundry Area, therefore the determination may need to be revised to indicate the CA800YE is only associated with the landfill area and the foundry area defined in the covenant.
3. The Long-Term Stewardship Evaluation revealed that elements of the Final Remedy have not been fully implemented through land use controls. The remedy assumed that a fence would be maintained around the site to limit exposure. It was determined during the preparation of the UECA Covenant that the fence was not present, thus the requirement to maintain the fence was not incorporated into the UECA Covenant. Since the Final Remedy relied on the presence of the fence to reduce potential exposure to potential contaminants above human-health based screening levels, the owner should consider if existing site fencing is adequate to protect exposure to soil potentially contaminated above industrial screening levels when considering future development opportunities.
4. The UECA Covenant only includes restrictions for the landfill area (SWP 456) and the foundry area, and thus only included coordinates for those two polygons.
  - a. The coordinates for the Entire Facility boundary should have been included in the UECA with the following Activity and Use Limitations: 1) The Facility property shall not be used for any purposes other than industrial unless it is demonstrated to VDEQ that such use will not pose a threat to human health or the environment and VDEQ provides prior written approval for such use. 2) Groundwater shall not be used for potable purposes unless it is demonstrated to VDEQ that such use does not pose an unacceptable risk to human health and VDEQ provides prior written approval for such use.
  - b. All previous historic landfills and associated sedimentation basins should be included in a revised UECA with the following AULs in addition to those listed above in 4a: "All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on those portions of the Facility associated with the closed landfills and associated sedimentation basins shall be prohibited without VDEQ approval of a Materials Management Plan."

**DEQ Long Term Stewardship Facility Map**  
Archer Creek Foundry – Lynchburg, Virginia





**Select Site Photos**

Photos by: Stephanie Houston

June 14, 2023

**Top of Landfill**



Facing South. Current activities in the former foundry area include storage and distribution of steel materials, auto parts collection, and auto repair.



Facing East. Top of landfill was recently mown, and most large woody vegetation was removed. Owner will continue removing large woody vegetation.



**Foundry – North Border**



Facing Southwest. Former Foundry administrative building in the foreground and steel materials storage and distribution activities in the background. White building on the left is a trailer unit.

**Car Parts Area**



Facing North. Current activities on former foundry area include car parts collection and repair.



**Foundry – West Border**



Facing Southeast. Fencing and lighting have been installed onsite in the Former Foundry Area.

**On Foundry Pad**



Facing North. Steel storage and distribution activity seen in foreground. Landfill seen in background.

**Foundry – South Border**



Facing North. Current onsite activities are observed. Brown building is mobile building.

Archer Creek Foundry  
2023 Long Term Stewardship Inspection

**Field Checklist**

Onsite Date/Time: 6/14/2023 11:00

Offsite Date/Time: 6/14/2023 13:30

Personnel Present and Contact Info:

- Oliver Kuttner, owner
- Nicole Tilley, VDEQ BRRO Solid Waste
- Stephanie Houston, VDEQ CO Corrective Action

<b><u>IC Review and Assessment Questions:</u></b>	<b><u>Yes</u></b>	<b><u>No</u></b>	<b><u>Notes</u></b>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?	X		UECA dated 2/13/2018 for portions of the entire facility.
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	X		Specific portions: 1.) Former Archer Creek Foundry Area, 2.) Landfill Area
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?		X	The ICs were only recorded for portions of the entire facility. The remedy requires restrictive use for the entire facility. There is potential for exposure to contamination beyond just the areas delineated in the UECA; however, no data confirming.
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	X		Current uses of property: <ul style="list-style-type: none"> <li>• Former foundry area is being used as storage and distribution of steel materials, auto repair, and auto parts collection</li> <li>• Landfill area unused</li> </ul>
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		X	N/A – no monitoring or active remediation Depending on future development, risk may need to be evaluated for receptors other than industrial/commercial.
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)	X		The UECA covenant did not include requirements for the Entire Facility as required by the Remedy.



Archer Creek Foundry  
2023 Long Term Stewardship Inspection

<ul style="list-style-type: none"> <li>• Are there plans to develop/sell/transfer the property?</li> </ul>	X		Wants to sell but also has possible development ideas: <ul style="list-style-type: none"> <li>• Landfill – concert venue, solar farm, parking area for adjacent business BWXT</li> <li>• Foundry area – condominiums for business space, aluminum extrusion facility</li> <li>• Riverbank area – wetlands, recreational area</li> <li>• Other areas – possible residential</li> </ul>
<ul style="list-style-type: none"> <li>• Have all reporting requirements been met?</li> </ul>	X		<b>Next UECA report due: 3/31/2024</b>

<u>Groundwater Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
<ul style="list-style-type: none"> <li>• Is groundwater onsite used for potable purposes?</li> </ul>		X	Former foundry well used for car washing and trailer toilet.
<ul style="list-style-type: none"> <li>• Is the Facility connected to a public water supply?</li> </ul>		X	
<ul style="list-style-type: none"> <li>• Have any new wells been installed at the facility?</li> </ul>		X	
<ul style="list-style-type: none"> <li>• For wells where groundwater monitoring is no longer required, have the wells been decommissioned?</li> </ul>	N/A	N/A	No Corrective Action wells, all existing wells associated with landfill permit

<u>Surface and Subsurface Soil Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
<ul style="list-style-type: none"> <li>• Is the facility being used for residential purposes?</li> </ul>		X	
<ul style="list-style-type: none"> <li>• Have there been recent construction or earth-moving activities or plans for such?</li> </ul>		X	Fence and lighting system in the Former Foundry Area, none on the Landfill Area

Archer Creek Foundry  
2023 Long Term Stewardship Inspection

**Notes:**

- Current contact bought into VCI last year
- Owner cut down most of trees on landfill, will continue cutting all trees down
- Hunter had dug pit on landfill, not very deep, owner filled back in
- Pallets, tubs, and drums were observed in the foundry area. The owner said that a renter was storing drinks (e.g., aluminum canned drinks) temporarily onsite.
- Owner is considering developing wetlands in the area along the river and near the former ponds
- Owner would like to abandon landfill GW wells and close landfill permit. BRRO Solid Waste will communicate with owner about this process.
- AEP with agreement from the owner renovated the rail line running along the western side of the facility (not located in UECA areas). Rail is currently being used to ship steel materials to the facility.
- A trailer and mobile building were observed in the Former Foundry Area. Owner said trailer used water from former foundry well for toilets, and toilet is connected to external tank and not to sewer system.