



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Director

August 26, 2024

Brian Seal
Technical/Quality Manager
BÖHLER High Speed Steel USA
Voestalpine High Performance Metals LLC
2306 Eastover Drive
South Boston, VA 24592
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VIA ELECTRONIC MAIL

**RE: Long Term Stewardship Evaluation Report
Voestalpine High Performance Metals Corporation – South Boston VA
EPA ID VAD089022685**

Dear Mr. Seal:

The Virginia Department of Environmental Quality, Office of Remediation Programs (VDEQ) has prepared the attached report following the Long-Term Stewardship evaluation performed on August 6, 2024 at the Voestalpine High Performance Metals site located in South Boston, Virginia. The inspection found several outstanding items with compliance of engineering/institutional controls and the RCRA CA remedy, including outstanding progress reports, survey information, and required deed restrictions. Additional details can be found in the attached report.

Sincerely,

A handwritten signature in cursive script that reads "Ryan J. Kelly".

Ryan J. Kelly
Corrective Action Project Manager
804-659-1377
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Office of Remediation Programs
1111 E. Main St.



Richmond, VA 23219
Office 1524-L

ECC: Tara Mason, – VDEQ-CO
Nichole Herschler, DEQ-BRRO
Jacqueline Morrison, Kristin Koroncai – USEPA Region III
Nicholas Frances – Voestalpine

Attachments



**Long-Term Stewardship Assessment Report
Voestalpine High Performance Metals Corporation – South Boston VA
(formerly Böhler-Uddeholm Specialty Metals, Inc.)
EPA ID VAD089022685**

Prepared by: Ryan Kelly

Date: August 26, 2024

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 (if needed), 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:

Böhler-Uddeholm Specialty Metals, Inc. is located at 2306 Eastover Drive, South Boston, Virginia 24592. The facility consists of approximately 43 acres. The main facility building houses office space and metal manufacturing operations. A process wastewater treatment plant and a former

impoundment are also located at the facility. The facility is primarily a finisher of specialty steels for use by the tool and die industries (drill bits, saw blades, cutting tools and similar applications). The steel finishing operation consists of grinding, drawing, and cleaning the steel to meet customer specifications.

During facility operations, from 1972 until 1985, lime stabilized spent pickle liquor solutions were temporarily stored in the former impoundment before being discharged into Wood's Creek. Discharge from the impoundment was performed in accordance with the facility's National Pollution Discharge Elimination System (NPDES) Permit (VA0051047).

The former RCRA hazardous waste management unit (HWMU) impoundment was taken out of service in 1985. All liquids that had collected in the impoundment were removed in accordance with the NPDES Permit. Based on approved closure activities, the remaining waste, approximately 590 cubic yards of sludge, was closed in place and covered by a protective cap. Closure certification was successfully completed on June 21, 1989. The former impoundment was closed as a landfill and post closure care is required under the current RCRA Hazardous Waste Management Permit.

A single RCRA solid waste management unit (SWMU) consists of a metal grinding sludge waste pile generated from past facility processing operations. The SWMU is located on the southwestern side of the main building approximately 240 feet south of the facility office area entrance. During the 1970s, the SWMU area was bare soil immediately beyond the margin of a smaller asphalt paved parking area. The grinding sludge material was placed on this portion of the site in the 1970s and this activity ceased prior to 1980. The SWMU size was estimated to be approximately 55 feet wide by 75 feet long. The metal grinding sludge is buried under fill material, which ranges in thickness from one (1) to seven (7) feet deep. The estimated volume is approximately 382 cubic yards of metal sludge grindings.

Current Site Status:

In September 2017, the facility's Hazardous Waste Management Permit was modified to incorporate a final remedy detailed in a Statement of Basis developed by the Virginia Department of Environmental Quality (DEQ), which included institutional/engineering controls and post closure care requirements. The modified permit became effective on September 8, 2017. The engineered cap consisting of asphalt pavement was extended over the known extent of the SWMU shortly after the RCRA remedy was finalized.

The facility's name was updated to Voestalpine High Performance Metals Corporation as part of Class 1 modification to the facility's permit.

The facility is under continued industrial use by Voestalpine for metal material production. Voestalpine leases the property from Halifax County.

Element 1: Legal Authorities

The Facility is subject to the Corrective Action (CA) Program under 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. §§ 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and waste constituents that have occurred at their site.

The remedy was imposed by Class 2 modification of the Facility's Hazardous Waste Management Permits on September 8, 2017.

Element 2: Information Regarding Engineering and Institutional Controls

The following controls are required as part of the CA remedy:

Associated Tax Parcel	Restriction	Applies to Polygon
<u>Tax Map:</u> Unknown	1. The restricted areas (HWMU and SWMU) of the Facility shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools, or playground purposes. 2. Disturbance, excavation, and/or management of soil or material in the restricted areas shall be prohibited. Future modifications at the Facility that could be reasonably understood to adversely affect or interfere with the integrity or protectiveness of the final remedy will be evaluated to identify and address those potential impacts or interferences. No removal, disturbance, or alteration shall occur to any corrective action components installed at the facility without VDEQ approval. limited to groundwater monitoring wells, without VDEQ approval.	Polygons have not been established with survey data.
<u>Tax Map:</u> Unknown	Maintain engineering controls consisting of the existing RCRA cap and existing/extended asphalt cover at the closed RCRA impoundment and the SWMU. Conduct an annual	Polygons have not been established with survey data.

Associated Tax Parcel	Restriction	Applies to Polygon
	inspection and routine maintenance of the controls, and place and maintain notification signs at the perimeter of the capped/covered areas.	

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

The facility's RCRA permit requires maintenance and post-closure care of the engineering controls for the SWMU and HWMU.

Condition II.D of the facility's RCRA permit requires that commencing one year from the submittal date of the modified Permit, the Permittee shall submit an initial progress report by March 1 of the following year on the remedy performance. Subsequent progress reports shall be submitted every 5 years. As of August 6, 2024 (LTS site visit) no progress report documentation had been provided to the Department. The facility subsequently submitted a draft report that is currently under review.

Portions of the Facility are located within the Regulatory Floodway and 1% Annual Chance Flood Hazard Areas 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

DEQ maintains a complete historical and current administrative record for the Facility.

Mapping: The EPA Facility website figure includes a Geospatial PDF showing the entire facility boundary. The figure will be updated to accurately provide the use restriction boundaries for the closed HWMU and SWMU once survey data is received from the facility.

Element 5 – Meaningful Engagement and Consultation

The Facility is currently active with continued industrial use. The EPA Region 3 website maintains updated information and key documents for the facility. In addition, the community may request information and documents from the VDEQ Office of Remediation Programs.

Element 6 – Funding

Financial Assurance: Financial Assurance is not required for this Facility since there is only monitoring and maintenance of activity and use limitations required.

Element 7 – Enforcement

The current RCRA permit allows DEQ to enforce the remedy. DEQ and/or EPA, without limitation, reserves its right to take administrative enforcement action under RCRA or other federal (or state) law for violations.

Element 8 – Enforceable Mechanisms

In September 2017, the facility's Hazardous Waste Management Permit was modified to incorporate a final remedy detailed in a Statement of Basis developed by the Virginia Department of Environmental Quality (DEQ), which included institutional/engineering controls and post closure care requirements. The modified permit became effective on September 8, 2017. The permit serves as the authority for enforcing the final remedy at the site.

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 August 6, 2024

DEQ conducted a long-term stewardship site visit to discuss and assess the status of the implemented remedies at the site. A field checklist is included with this report.

Follow-up Activities:

The draft progress report submitted by the facility will be reviewed and feedback provided as necessary.

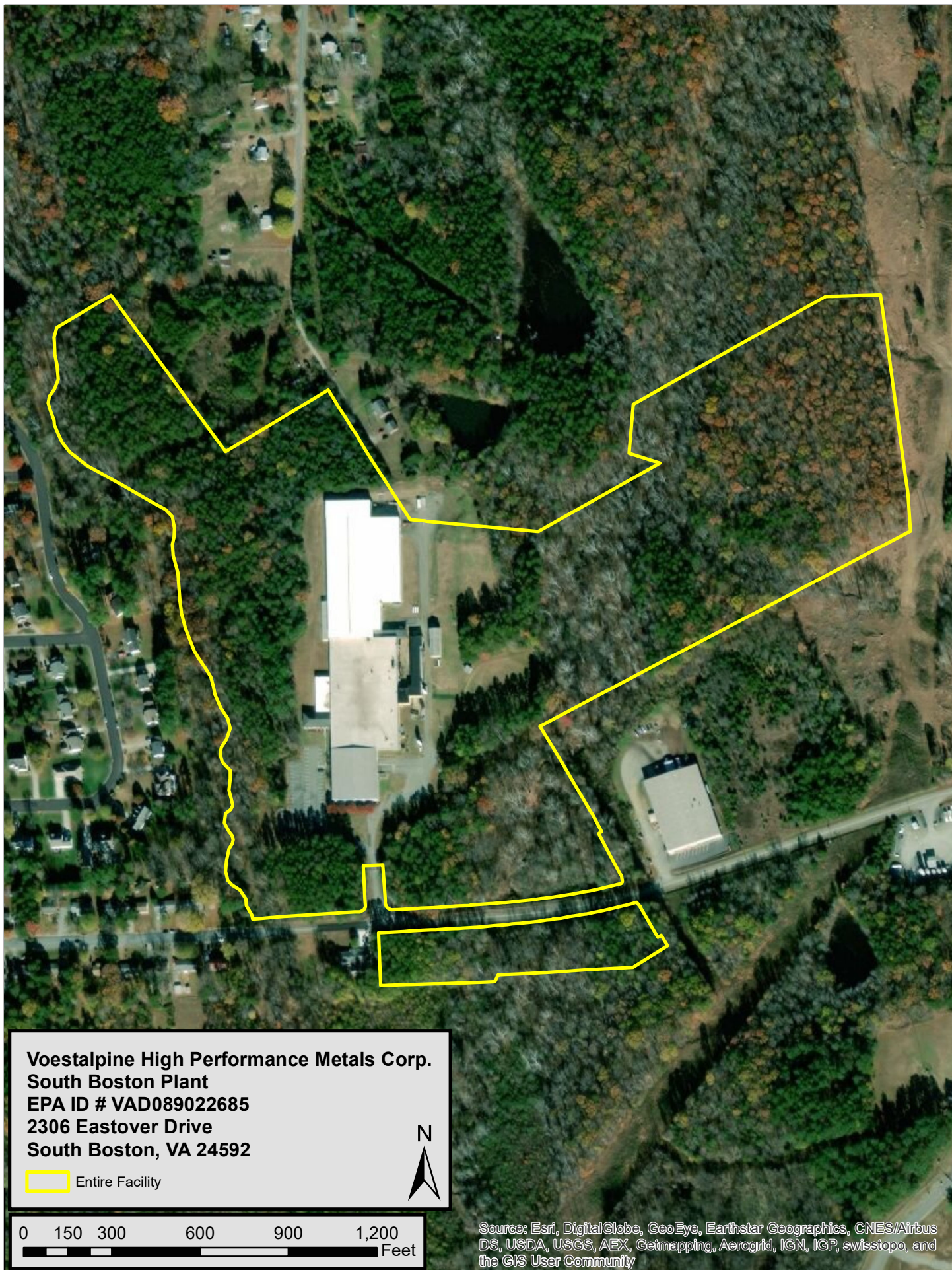
DEQ will follow up with the facility to ensure that proper survey data is obtained for the HWMU and SWMU and provide the information to EPA for mapping purposes on the facility's webpage. The survey data will also be necessary to establish the deed restrictions required by the RCRA CA remedy. DEQ will work with the facility to develop a UECA covenant which will capture the ongoing RCRA requirements and will ultimately serve as the enforceable mechanism.

Conclusion:


The engineering and institutional controls selected and defined within the facility's RCRA permit have been partially implemented. The cap/cover for both the HWMU and SWMU remain intact, undamaged, and properly maintained. Some follow up activities are needed to address the items identified above.

Voestalpine/Bohler
2024 Long Term Stewardship Evaluation

DEQ Long Term Stewardship Facility Map
Voestalpine/Bohler – South Boston, Virginia



**Voestalpine High Performance Metals Corp.
South Boston Plant
EPA ID # VAD089022685
2306 Eastover Drive
South Boston, VA 24592**

 Entire Facility



0 150 300 600 900 1,200
Feet

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Select Site Photos
Photos by: Ryan Kelly
Taken August 6, 2024



SWMU with asphalt cover



SWMU with asphalt cover

Voestalpine/Bohler
2024 Long Term Stewardship Evaluation



Sign at SWMU



HWMU with fencing and sign

Voestalpine/Bohler
2024 Long Term Stewardship Evaluation



HWMU

VADEQ - Long Term Stewardship Checklist
VOESTALPINE HIGH PERFORMANCE METALS CORPORATION
EPA ID NO. VAD089022685

Date of Visit

August 6, 2024

DEQ Personnel

Ryan Kelly, Corrective Action PM

Facility Representatives

Brain Seal

Nicholas Frances

Selected Remedies:

Compliance with and Maintenance of Institutional and Engineering Controls (ICs and ECs)

AULs:

Associated Tax Parcel	Control/Restriction	Applies to Polygon
<u>Tax Map:</u> Unknown	1. The restricted areas (HWMU and SWMU) of the Facility shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools, or playground purposes. 2. Disturbance, excavation, and/or management of soil or material in the restricted areas shall be prohibited. Future modifications at the Facility that could be reasonably understood to adversely affect or interfere with the integrity or protectiveness of the final remedy will be evaluated to identify and address those potential impacts or interferences. No removal, disturbance, or alteration shall occur to any corrective action components installed at the facility without VDEQ approval. limited to groundwater monitoring wells, without VDEQ approval.	Polygons have not been established with survey data.

Associated Tax Parcel	Control/Restriction	Applies to Polygon
<u>Tax Map:</u> Unknown	Maintain engineering controls consisting of the existing RCRA cap and existing/extended asphalt cover at the closed RCRA impoundment and the SWMU. Conduct an annual inspection and routine maintenance of the controls, and place and maintain notification signs at the perimeter of the capped/covered areas.	Polygons have not been established with survey data.

<u>IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?		X	<i>Corrective Action Permit Modification 9/8/2017 to incorporate remedy.</i> <i>No deed restrictions or UECA recorded</i>
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	X		
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?	X		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	X		
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		X	
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)		X	
• Are there plans to develop or sell the property?		X	
• Have all reporting requirements been met?		X	Missing compliance reports, 1 -yr and 5-yr Reports

			originally due 2018 and 2023.
<u>Groundwater Remedy Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?		X	Well Abandonment has not been completed

<u>Surface and Subsurface IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the facility being used for residential purposes?		X	
• Have there been recent construction or earth-moving activities or future plans for such?		X	

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have engineered caps been properly maintained?	X		
• Does vegetative cover in Riparian Buffer area remain intact?	X		
• Have any repairs been necessary? (i.e. regrading, filling, root removal)		X	
• Is the leachate collection system operating and effectively preventing groundwater contamination?			NA

<u>Miscellaneous EC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
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