



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stefanie K. Taillon
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director

March 4, 2025

Mr. Hoyt Parris
Haley Toyota
1530 Courtland Rd NE
Roanoke, VA 24012
hparris@haleyauto.com

VIA ELECTRONIC MAIL

**RE: Long Term Stewardship Report
Public Works Service Center, Roanoke City
EPA ID VAD123725350**

Dear Mr. Parris:

The Virginia Department of Environmental Quality, Office of Remediation Programs (DEQ) has prepared the attached report following the Long-Term Stewardship inspection performed on January 27 at the Public Works Service Center-Roanoke City site located in Roanoke, Virginia. The inspection found no outstanding items with compliance of engineering and institutional controls as defined within the 2002 Notice of Use Limitation.

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.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephanie Houston".

Stephanie Houston, Corrective Action Project Manager
Virginia Department of Environmental Quality
(804)584-3143
Stephanie.Houston@deq.virginia.gov
Office of Remediation Programs
1111 East Main Street, Suite 1400
Richmond, VA 23219
(804)698-4000



ECC: Tara Mason– DEQ-CO
Nikki Herschler – DEQ-BRRO
Kristin Koroncai – USEPA Region III



**Long-Term Stewardship Assessment Report
Public Works Service Center, Roanoke City
EPA ID VAD123725350**

Prepared by: Stephanie Houston

Date: March 4, 2025

Remedy Review Summary

The Long-Term Stewardship Assessment showed that engineering and institutional controls selected and defined within the 2002 Notice of Use Limitation are implemented and remain intact and undamaged.

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 Hazardous Waste Cleanup facilities. In October 2024, EPA changed the name of its “Resource Conservation and Recovery Act Corrective Action Program” to the “Hazardous Waste Cleanup Program.” This rebranding is intended to increase broad understanding of the purpose of the program. The LTS 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 Hazardous Waste Cleanup Program has identified key elements of effective Long-Term Stewardship for hazardous waste 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 Facility is located at 1802 Courtland Road NE in Roanoke, Virginia, 24012. The Facility originally included only the Public Works Service Center (PWSC) for the City of Roanoke (City), Virginia, which is a vehicle, street, and building maintenance facility and included warehousing, refueling, fleet vehicle maintenance, and vehicle washing operations. In 2014, the

City sold approximately seventeen acres to 360 Toyota LLC (1530 Courtland Road NE), who later constructed a building on their property in 2015. The Facility utilizes the public water supply and sanitary sewer systems, which is operated and maintained by the Western Virginia Water Authority. Light industrial and residences exist to the north and east of the Facility.

From the late 1970s through 1991, PWSC Roanoke disposed of solid and hazardous wastes in the southern portion of the Facility. Some waste was placed on the surface of the ground while other waste was buried. Because of these land disposal activities, Virginia Department of Environmental Quality (DEQ) issued several Consent Orders (COs) to the City of Roanoke. After the City performed investigations and remedial actions, DEQ granted approval of risk-based unrestricted “clean closure” for unsaturated soils and saturated (groundwater) soils for HWMU No. 1, risk-based restricted “clean closure” for unsaturated soils for HWMU No. 2, and unrestricted risk-based “clean closure” for saturated soils (groundwater) for HWMU No. 2. A Notice of Use Limitation (“Notice”) for HWMU No. 2 (also referred to in the Notice “Unit No. 2”) as identified in Tax map No. 3070316 was recorded with the Circuit Court for the City of Roanoke on May 20, 2002. The Notice, which sets forth permissible activities and uses and inconsistent uses for Unit No. 2, was submitted to the DEQ by the Facility on April 1, 2002.

All consent orders were terminated by the DEQ July 9, 2004. EPA issued a Statement of Basis (SB) on August 28, 2009, which summarized environmental investigations at the Facility and proposed that no further corrective actions were necessary except for implementation and maintenance of institutional controls. The Final Decision and Response to Comments (FDRTC) was released on September 30, 2009 after the SB received no comments during the public comment period. An EPA Long-Term Stewardship Assessment Report dated July 28, 2015 stated that on April 13, 2013, 360 Toyota, L.L.C purchased parcels 3070316 (approximately 15.68 acres) and 3070322 (approximately 1.5 acres) from the City of Roanoke, which includes Unit No. 2. The report stated that Unit No. 2 has been covered with a layer of soil and is now being used as a parking lot for Toyota vehicles. The report also stated that long-term stewardship assessments will now be conducted for Haley Toyota instead of the Public Works Service Center-Roanoke City. On January 27, 2025, a LTS was conducted for only the Haley Toyota property that includes Unit No. 2 and showed that engineering and institutional controls defined within the 2002 Notice of Use Limitation are implemented and remain intact and undamaged.

Current Site Status:

Nineteen acres of the Facility is still owned by the City of Roanoke and remains an active facility. Seventeen acres was sold to 360 Toyota LLC and is an active dealership.

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 the facility were implemented through a Notice of Use Limitation recorded with the Office of the Clerk of the Circuit Court of the City

Roanoke on May 20, 2002. The Notice serves as the authority for enforcing the final remedy at the Facility.

Element 2: Information Regarding Engineering and Institutional Controls

The following controls were described in the Notice of Use Limitation recorded on May 20, 2002 as referenced in the CA remedy and are specific to Unit No. 2, which is also known as HWMU No. 2.

Associated Area	Restriction
Unit No. 2 (HWMU #2)	<ol style="list-style-type: none">1. Uses inconsistent with the Notice of Use Limitation include construction and occupancy of residential dwellings; playgrounds for children; childcare center; and public garden space.2. No construction without consultation with the Department of Environmental Quality (DEQ).3. All soil removed shall be tested and treated as hazardous waste and disposed of as such if found to contain hazardous waste constituents.4. All workers involved in disturbing soils shall be properly trained and provided with proper personal protective equipment.5. Permitted activities and uses include construction for a parking area for private and City-owned vehicles; construction of a stadium/amphitheater complex; and such other uses with opinion of a Professional Engineer and approval of DEQ.

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

The Notice of Use Limitation requires that institutional controls are maintained at Unit No. 2.

The Facility is not located within a floodway or flood hazard area as indicated on [FEMA's National Flood Hazard Layer \(NFHL\) Viewer](#). Remedies are therefore not susceptible to climate impacts based on these flood criteria.

Element 4 – Recordkeeping and Tracking

The Notice of Use Limitation 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. The map was field-verified, and no issues were noted. All land use limitations apply to Unit No. 2.

Element 5 – Meaningful Engagement and Consultation

The Facility has active operations, and it has no off-site impacts. The commencement of a thirty (30)-day public comment period for the Statement of Basis (SB) was announced in the Roanoke Times on August 28, 2009. EPA received no comments on its proposed remedy for the Facility; the Final Remedy therefore did not change from the remedy proposed in the SB.

Element 6 – Funding

The Statement of Basis noted that since no further investigations of corrective actions are anticipated, financial assurance is not required for the Facility.

Element 7 – Enforcement

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

Element 8 – Enforceable Mechanisms

Corrective Action remedies are enforceable through a Notice of Use Limitation recorded on May 20, 2002. A call to the Deed Desk (540-853-6709) of the Clerk of the Circuit Court on January 7, 2025 indicated that no other documents have supplanted the Notice.

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 January 27, 2025

DEQ conducted a long-term stewardship site visit to discuss and assess the status of the implemented remedies at the site. The attendees were:

Name	Organization	E-mail Address	Phone Number
Stephanie Houston	DEQ	stephanie.houston@deq.virginia.gov	(804)584-3143
Hoyt Parris	Haley Toyota	hparris@haleyauto.com	(540)400-0161

A field report is included with this letter. The following notes were included in the field report:

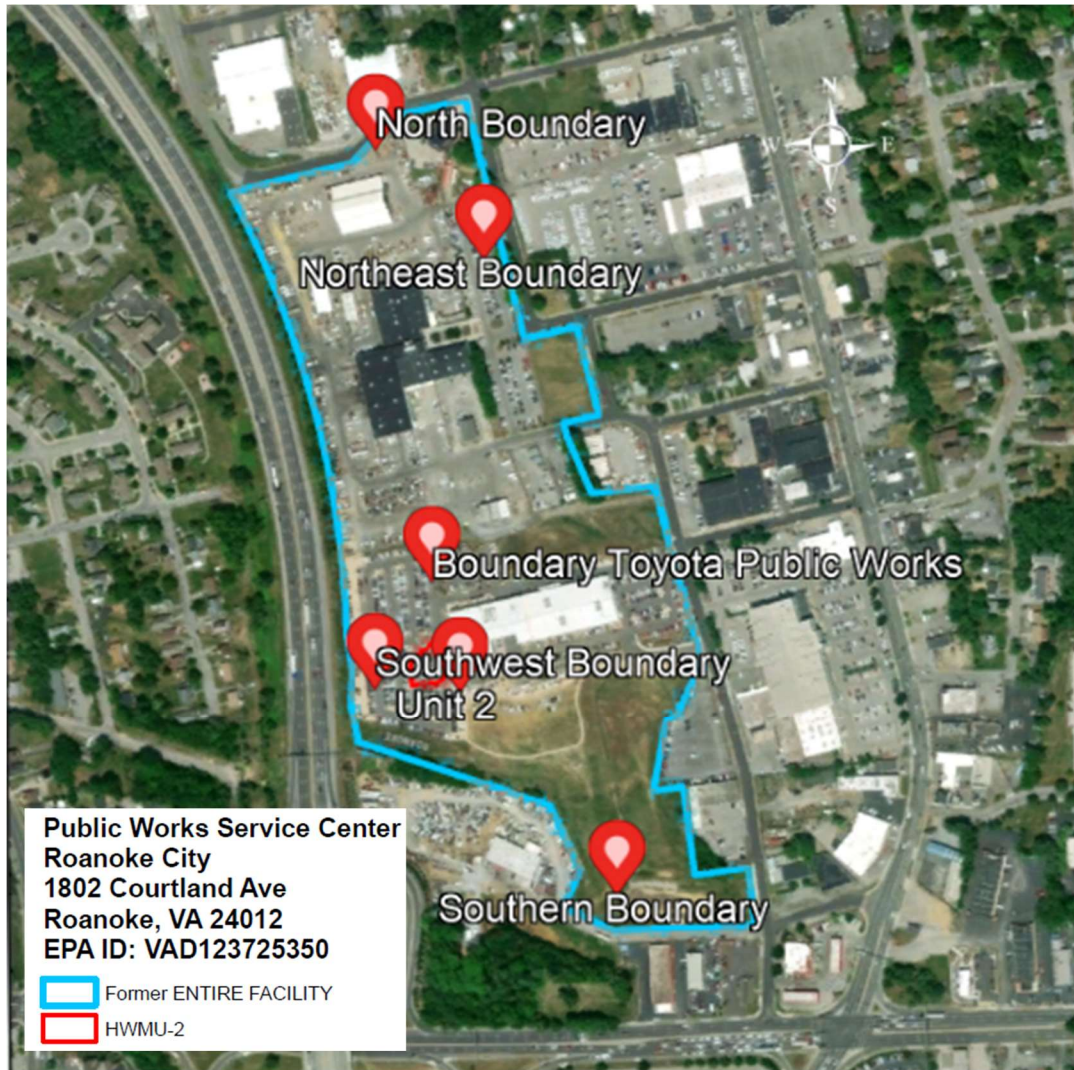
- The Facility confirmed that no recent construction or earth-moving activities have occurred since the construction of the building, which was completed around July 2015.
- There are no plans for additional development on the property.

Follow-up Activities:

No follow-up activities are required for this LTS evaluation.

Public Works Service Center, Roanoke City
2025 Long Term Stewardship Inspection

DEQ Long-Term Stewardship Facility Map
Public Works Service Center, Roanoke City – Roanoke, Virginia



Public Works Service Center, Roanoke City
2025 Long Term Stewardship Inspection

Select Site Photos
Photos by: Stephanie Houston
January 27, 2025

Unit 2



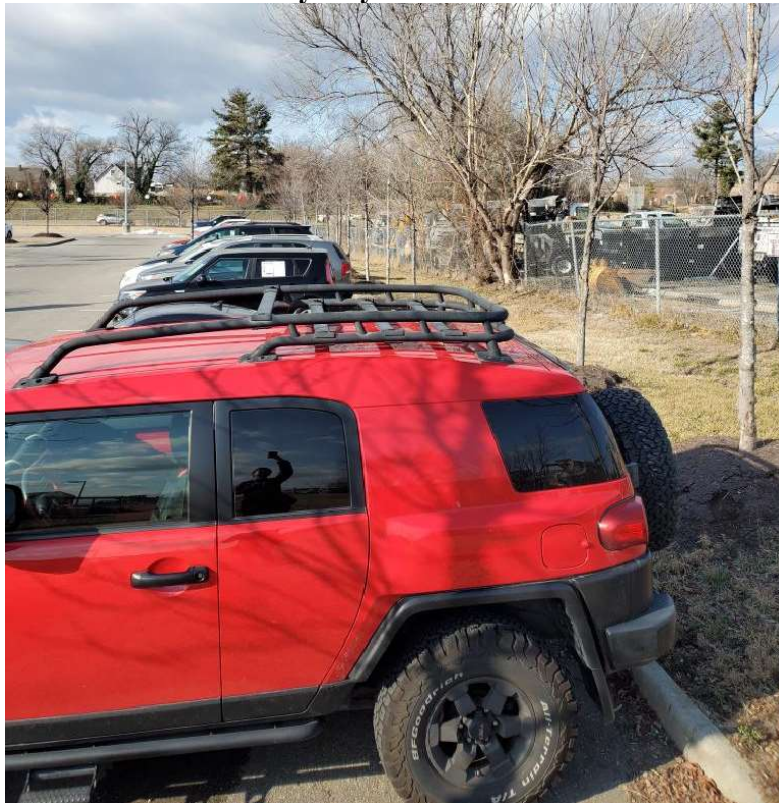
At Eastern boundary of Unit No. 2 facing west towards Unit No. 2 (Toyota property).

Southwest Boundary



At Southwestern boundary facing East and Unit No. 2 (Toyota property).

Boundary Toyota Public Works



At boundary between Toyota property and Public Works property facing west. Toyota purchased approximately 16 acres of land from the City of Roanoke in 2013.

Southern Boundary



At Southern Boundary facing south (Toyota property). A stormwater structure was located in the southern portion of the property.

Public Works Service Center, Roanoke City
2025 Long Term Stewardship Inspection

Northeast Boundary



At Northeast boundary facing southwest (Public Works property). The Public Works Service Center is still active.

North Boundary



At Northern boundary facing south (Public Works property). The Public Works Service Center is still active.

Public Works Service Center, Roanoke City
2025 Long Term Stewardship Inspection

Field Checklist

Public Works Service Center, Roanoke City – Roanoke, Virginia

Site visit date: 1/27/2025

Time of visit: 10:00 am

People Present (name/phone/e-mail):

Hoyt Parris, Operations Manager, (540)400-0161, hparris@haleyauto.com

<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		
• 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	
• <i>Are there plans to develop or sell the property? Southern unpaved area?</i>		X	No plans to develop or sell the property; nothing planned for southern unpaved area

Public Works Service Center, Roanoke City
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<u>Surface and Subsurface Soil Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• <i>Is the facility being used for residential purposes?</i>		X	
• <i>Have there been recent construction or earth-moving activities or plans for such?</i>		X	

<u>Miscellaneous Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have you been in contact with Public Works at all regarding the CA program? Who's the contact?		X	

Other Notes

- ~9 years ago – building built; 10-year anniversary of opening this July