



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stefanie K. Taillon
Secretary of Natural and Historic Resources

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

August 26, 2025

Tommy Bishop
tommybishop@recyclewv.com

VIA ELECTRONIC MAIL

**RE: Long Term Stewardship Evaluation Report
Radford Trading LLC - Radford VA
EPA ID VAD981730930**

Dear Mr. Bishop:

The Virginia Department of Environmental Quality, Office of Remediation Programs (DEQ) has prepared the attached report following the Long-Term Stewardship inspection performed on the Radford Trading LLC site located in Radford, Virginia. The inspection found no outstanding items with compliance of institutional controls.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ryan J. Kelly".

Ryan J. Kelly
Corrective Action Project Manager
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Office of Remediation Programs
1111 E. Main St.
Richmond, VA 23219
Office 1524-L

Radford Trading LLC
2025 Long Term Stewardship Evaluation

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

Attachments



Long-Term Stewardship Assessment Report Radford Trading LLC

EPA ID VAD981730930

Prepared by: Ryan Kelly

Date: August 26, 2025

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:

The Facility is located at 1701 West Main Street in Radford, Virginia. The approximately 66-acre property was formerly owned and operated as an iron foundry beginning in the 1890s. Foundry operations were conducted until 2014. The previous owner decommissioned,

dismantled and removed much of the foundry equipment from the Facility in late 2015 and early 2016.

Various foundry buildings have operated on the property since the 1890s. The former New River Foundry became operational in 1977 and produced medium-sized iron parts for automobiles, farm equipment and construction equipment. Castings were formed in green sand molds with phenolic urethane cores. The Facility was heavily automated and featured two production lines. The former New River Foundry was owned and operated by subsidiaries of Intermet Corporation from 1977 until May 2010 when it was sold to Virginia Casting Industries, LLC. Virginia Casting Industries, LLC owned and operated the Facility until March 2012 when the Facility was sold to Grede Radford, LLC. Grede Radford, LLC owned and operated the Facility until early 2014 when the Facility closed. The property is now owned by Radford Trading, LLC.

The Facility is bounded by the demolished Former Radford Foundry to the North; the New River to the West; railroad tracks and parking lots to the South; and West Main Street to the East.

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. Solid non-hazardous wastes generated at the facility included commercial wastes (trash, cardboard, pallets, drums, bags, etc.), foundry production wastes (used sand, used/broken cores, carbide slag, cupola slag, used refractory, baghouse dust, used air pollution bags or filters, used grinding wheels), and waste fluids (oil, metal cleaner, rust preventive testing fluids, spent scrubber liquid, etc.). Commercial waste was disposed off-site through contracted trash hauling services. Foundry production wastes were formerly disposed at on-site landfills until the landfills were full. After the landfills were full, the foundry production wastes were transported off-site for disposal at off-site facilities.

Current Site Status:

A report entitled *Description of Current Conditions, RCRA Corrective Action Program* was prepared by Groundwater and Environmental Services, Inc. in April 2003 concerning the Facility. The report identified 72 Solid Waste Management Units (SWMUs) and two Areas of Concern (AOCs) at the Facility. Additional investigations were conducted, including a RCRA Facility Investigation by Intermet in 2004 and a Targeted Brownfield Assessment by U.S. EPA in 2011. Subsequent investigation reports include the *Phase I Investigation Summary Report, RCRA Corrective Action Program*, dated February 2005, and the *Targeted Brownfields Assessment Report, ASTM Phase II Environmental Assessment, Virginia Casting Industries Property, New River Foundry, Radford, Virginia*, dated July 30, 2012. After reviewing the results of these investigations, DEQ determined that a quantitative risk assessment should be conducted for the environmental media at 46 SWMUs. A report containing that assessment was submitted by Haley & Aldrich, Inc. in February 2017 entitled *Report on Former New River*

Foundry. The February 2017 report and associated documents were approved by DEQ in a letter dated February 26, 2019.

On August 5, 2019, the Final Decision and Response to Comments was issued by the DEQ, which represents Remedy Selection and Remedy Construction Complete determination in accordance with the Corrective Action process. The remedy included institutional controls.

On June 17, 2020, Radford Trading LLC recorded an environmental covenant compliant with the Uniform Environmental Covenant Act (UECA) with the City of Radford Clerk of Circuit Court to establish land use controls.

Element 1: Legal Authorities

A UECA Covenant was recorded on June 17, 2020 in the City of Radford Clerk of the Circuit Court. The UECA Covenant serves as the authority for enforcing the final remedy at the site. DEQ is listed as the Agency in the Covenant.

Element 2: Information Regarding Engineering and Institutional Controls and Remedy

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

Associated Tax Parcel	Restriction	Applies to Polygon
<u>Tax Parcel IDs:</u> 17-(1)-1, 17-(1)-1A, 17-(1)-2, 18-(1)-8B and 18-(4)-16,-17,-18,-19,-20	1. To ensure that potential exposures to hazardous constituents in soil and groundwater encountered during construction or other intrusive activities are minimized, the then owner of the Facility shall comply with, and ensure that its contractors comply with, the Materials Management Plan prepared by Haley & Aldrich, Inc. dated September 2018, as the same may be amended by VDEQ. 2. Groundwater beneath the Facility shall not be used for potable purposes unless and until it is demonstrated to VDEQ that its use will not pose a threat to human health or the environment and VDEQ provides	Entire Facility

Associated Tax Parcel	Restriction	Applies to Polygon
	prior written approval of such use. 3. The Facility property shall not be used for residential purposes unless it is demonstrated to VDEQ that residential use will not pose a threat to human health or the environment and VDEQ provides prior written approval for such use.	

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

The UECA Covenant requires that, by the end of May 2025 and the end of every five years 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 the environmental Covenant are being observed. DEQ received the required documentation during the site visit on August 19, 2025.

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.

Portions of the Facility are located within the Regulatory Floodway, 1% Annual Chance, and 0.2% 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

The UECA Covenant provides visual representation of the activity and use limitations.

Mapping: The EPA Facility website includes a figure with a Geospatial PDF showing the use restriction boundaries.

Element 5 – Meaningful Engagement and Consultation

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 DEQ Office of Remediation Programs.

Element 6 – Funding

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

Element 7 – Enforcement

The UECA allows EPA and the Grantor listed in the Covenant the Authority to enforce the remedy. EPA, without limitation, reserves its right to take administrative enforcement action under RCRA or other federal law for violations.

Element 8 – Enforceable Mechanisms

A UECA covenant was recorded on June 17, 2020. The UECA serves the authority for enforcing the final remedy at the site. DEQ is listed as the Agency in the Covenant.

Element 9 – Dedicated Resources

The Performance Partnership Grant Workplan provides for Long-Term Stewardship activities.

Long-term Stewardship Information Review:

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.

Documents Reviewed:

EPA Region 3 Corrective Action Sites Webpage - Facility Fact Sheet
Final Decision and Response to Comments (8/5/2019)
Environmental Covenant (recorded 6/17/2020)
Google Earth imagery (10/11/2022)

Follow-up Activities:

None

Conclusion:

The institutional controls selected and defined within the 2020 UECA Covenant are implemented and remain intact and undamaged.

Radford Trading LLC
2025 Long Term Stewardship Evaluation

DEQ Long Term Stewardship Facility Map
Radford Trading LLC – Radford, Virginia



Radford Trading
VAD981730930

1701 West Main Street
Radford, Virginia 24141

Entire Property
Boundary



0 150 300 600 900 1,200 1,500 Feet

GeoEye, Maxar, Microsoft

VADEQ - Long Term Stewardship Checklist
Radford Trading LLC
EPA ID NO. VAD981730930

Date of Site Visit

August 19, 2025

DEQ Personnel

Ryan Kelly, Corrective Action PM

Facility Representatives

Tommy Bishop, RECYCLE WV

Selected Remedies:

Compliance with and Maintenance of Institutional Controls (ICs):

Associated Tax Parcel	Remedy Component or Restriction	Applies to Polygon
<u>Tax Parcel IDs:</u> 17-(1)-1, 17-(1)-1A, 17-(1)-2, 18-(1)-8B and 18-(4)-16,-17,-18,-19,-20	1. To ensure that potential exposures to hazardous constituents in soil and groundwater encountered during construction or other intrusive activities are minimized, the then owner of the Facility shall comply with, and ensure that its contractors comply with, the Materials Management Plan prepared by Haley & Aldrich, Inc. dated September 2018, as the same may be amended by VDEQ. 2. Groundwater beneath the Facility shall not be used for potable purposes unless and until it is demonstrated to VDEQ that its use will not pose a threat to human health or the environment and VDEQ provides prior written approval of such use.	Entire Facility

Associated Tax Parcel	Remedy Component or Restriction	Applies to Polygon
	3. The Facility property shall not be used for residential purposes unless it is demonstrated to VDEQ that residential use will not pose a threat to human health or the environment and VDEQ provides prior written approval for such use.	

IC Review and Assessment Questions:	Yes	No	Notes
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?	X		UECA recorded in the Clerk's Office of City of Radford, 06/17/2020
• 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		

<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 been decommissioned?	X		

<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 covers/caps been properly maintained?			Not Applicable
• Does vegetative cover in Riparian Buffer area remain intact?			Not Applicable
• Have any repairs been necessary? (i.e. paving, sealing, regrading, filling, root removal)			Not Applicable
• Is the leachate collection system operating and effectively preventing groundwater contamination?			Not Applicable

<u>Miscellaneous EC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the security fence intact?			Not required in remedy.
• Is the appropriate signage posted?			Not required in remedy.

Additional Notes:

[illegible]