



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

July 21, 2025

Janie Smith
Remediation Program Manager
International Paper Company
6400 Poplar Avenue
Memphis, TN 38197

VIA ELECTRONIC MAIL

RE: Long Term Stewardship Report
International Paper, Richmond Gravure Facility
EPA ID VAD046979498

Dear Ms. Smith:

The Virginia Department of Environmental Quality, Office of Remediation Programs (VDEQ) has prepared the attached report following the Long-Term Stewardship evaluation performed on April 9 at the International Paper, Richmond Gravure Facility site located in Richmond, Virginia. The evaluation found no outstanding items with compliance of engineering and institutional controls as defined within the 2011 Uniform Environmental Covenant Act (UECA)-compliant 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.

Respectfully,

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

Stephanie Houston
Corrective Action Project Manager



ECC: Tara Mason – VDEQ-CO
Jeremy Kazio – VDEQ-PRO
Kristin Koroncai – USEPA Region III
David Copen, PE – AECOM

Attachments:

- LTS Assessment Report
- Site Photos
- LTS Site Visit Checklist
- Figure 2 from 2014 Annual Report



**Long-Term Stewardship Assessment Report
International Paper, Richmond Gravure Facility
EPA ID VAD046979498**

Prepared by: Stephanie Houston

Date: July 21, 2025

Remedy Review Summary

The Long-Term Stewardship Assessment showed that engineering and institutional controls selected and defined within the 2011 UECA covenant 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 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 International Paper (Richmond) property (“Facility”) is located at 3400 Deepwater Terminal, Richmond, Virginia, 23234 and is approximately 36 acres. The Facility is bordered by industrial properties to the north, south, and west. The James River and its floodplain border the Facility to the east.

The Facility was formerly used as a warehouse in the late 1960s. Printing operations started in 1969, where folding cartons were printed until 2000. The Facility is owned by International Paper, Richmond Gravure, and is divided into two parcels, the north parcel which consists of 16 acres and the south parcel which consists of 36 acres. These parcels were acquired by International Paper in 1979 and 1988, respectively. The Facility includes a large building/warehouse, a paved parking area, undeveloped fields, and a wooded area to the east of the plant building. In 2004, the south parcel was sold by International Paper to Deepwater Holdings Properties LLC. The Facility is located in an area that is zoned for industrial use.

Prior to International Paper's acquisition of the Facility, waste generated during construction of Interstate 95 and the City of Richmond sanitary sewer line was disposed of on the Facility property to the east and south of the plant building. A landfill was constructed in the area east of the plant building to fill in the hillside and was used from 1970 to 1979. Historical investigations revealed strong chemical odors, fiberglass materials, and VOC contamination in the soil and exposed debris and drums along the slope and toe of the landfill. The site joined the EPA's Facility Lead Corrective Action program in 1994. Subsequent investigations found unacceptable risks of PCBs in surface soils and volatile organic compounds in groundwater for an industrial risk scenario. An asphalt cap on the landfill with a 5-year ground water monitoring plan was the recommended corrective measure. Based on the results of the 5-year monitoring program EPA determined that VOCs and PCBs at the Facility were not migrating in groundwater from the landfill.

A Final Decision and Response to Comments released in 2010 stated that the final remedy was monitoring and maintenance of the asphalt cap and the implementation of, compliance with, and continued maintenance of institutional controls. A Uniform Environmental Covenants Act (UECA) covenant was recorded on October 5, 2011, which defined the restrictions and required activities/actions for the Asphalt Cap and North Parcel of the Facility. A Long-Term Stewardship (LTS) report was prepared in 2014 and made the following assessment: 1.) the asphalt cap requires completion in the area pointed out during inspection; 2.) stormwater discharging from the roof over the loading dock must be managed so there is 100% discharge to the asphalt cap; 3.) the Facility survey must be corrected to depict the true extent of the asphalt cap; and 4.) annual reports should be submitted to EPA and DEQ personnel; and 5.) repairs to the asphalt cap would be documented in the annual report.

Current Site Status:

The Facility remains an active facility. The Facility is currently only being used for distribution; no production is conducted at the facility.

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 the UECA-compliant Environmental Covenant recorded on September 8, 2011. The UECA serves as the authority for enforcing the final remedy at the Facility. EPA is listed as the Agency in the Covenant.

Element 2: Information Regarding Engineering and Institutional Controls

The following controls were described in the UECA covenant recorded on September 8, 2011 as part of the CA remedy and are Facility-Wide with some limitations applicable to specific areas.

Associated Area	Restriction/Required Activity
North Parcel	<ol style="list-style-type: none">1. There shall be no use of the Property other than “industrial use” (defined in Section I.E in UECA). In no case, however, shall the Property be used for (a) a residential setting for all or any portion of the Property; (b) a scenario that includes the routine presence of children at the Property; (c) or other similar condition.2. Groundwater at the Property shall not be extracted or used for potable or non-potable purposes, except for ground water monitored from monitoring wells.3. No ground water extraction wells shall be installed on the Property, until and unless approved in writing by EPA, or EPA determines groundwater clean-up levels have been achieved.4. Uses of all or any portion of the Property shall, at a minimum, be restricted to uses that do not impair the efficacy and the protectiveness of the remedy.
Asphalt Cap	<ol style="list-style-type: none">1. Owner shall have responsibility for the maintenance of the Asphalt Cap. Owner shall: (a) Monitor and inspect and promptly repair any and all Asphalt Cap deficiencies; and (b) perform seal coating of the Asphalt Cap at least every five (5) years unless inspections reveal that more frequent application is necessary.2. The Owner shall inspect the Asphalt Cap on at least an annual basis and provide a written report of the Asphalt Cap status to EPA and VADEQ within thirty (30) calendar days of the final inspection.3. All such maintenance and repair shall be conducted at Owner’s sole cost and expense.

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

The UECA Covenant requires that the owner shall inspect the Asphalt Cap on at least an annual basis and provide a written report of the Asphalt Cap status to EPA and DEQ within thirty (3) calendar days of the final inspection.

Undeveloped portions of the Facility are located within a Regulatory Floodway and 1% Annual Chance Flood Hazard Area (Zone AE) as well as a 0.2% Annual Chance Flood Hazard Area as indicated on [FEMA's National Flood Hazard Layer \(NFHL\) Viewer](#). The asphalt cap is not within these flood hazard areas.

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. The map was field-verified, and the portion of the asphalt cap under the overhang is not fully represented in the Geospatial PDF.

Element 5 – Meaningful Engagement and Consultation

The Facility has active operations, and it has no off-site impacts. The EPA held a thirty (30)-day public comment period for the Statement of Basis (SB) from July 21, 2010 to August 21, 2010. All of the comments received by EPA during the public comment period were carefully reviewed by EPA, and EPA's comments were included in the FDRTC. None of the comments received warranted a modification or change to the Final Remedy.

Element 6 – Funding

The Final Decision and Response to Comments states that, since the landfill cap has already been installed, financial assurance will not be required as the cost for the monitoring and maintenance of the cap will be minimal.

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

Corrective Action remedies are enforceable through an UECA-compliant Environmental Covenant recorded on October 5, 2011.

Element 9 – Dedicated Resources

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

Long-term Stewardship Site Visit: On April 9, 2025

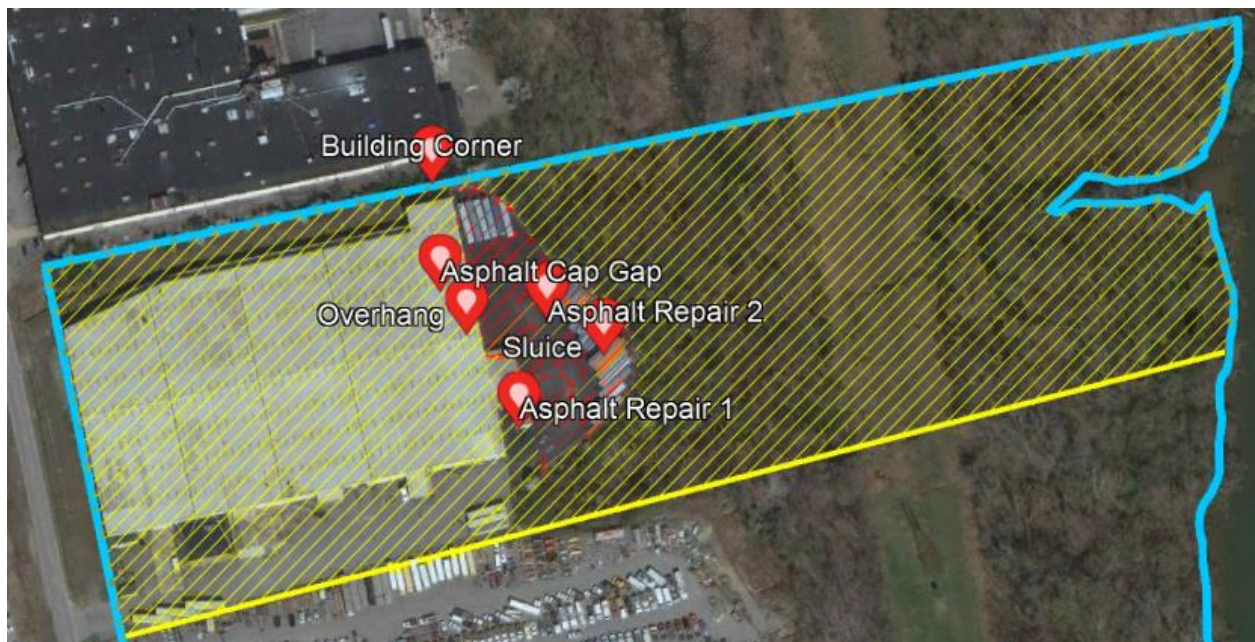
DEQ conducted a LTS site visit, along with a review of documents, to discuss and assess the status of the implemented remedies at the site. A field report is included with this letter. The following notes were included in the field report:

- In reviewing prior documents, the 2014 Annual Inspection and Asphalt Cap Maintenance report addressed multiple notes made during the 2014 LTS assessment:
 - The report noted that asphalt pavement was installed under the overhang on August 12, 2014, addressing EPA Assessment Note #1. During the site visit, it was noted that the asphalt cap does exist below the overhang and that it had been resealed.
 - The added asphalt pavement under the overhang addressed EPA Assessment Note #2.
 - The report included a revised survey dated 10/13/2014 that corrected the original survey dated 4/18/2011 to reflect the original asphalt cap extents, which did not include coverage under the overhang to address EPA Assessment Note #3.
 - The report noted repairs that were made on September 16, 2014 to the asphalt cap, which addressed the final note in the EPA assessment.
 - The report included a Site Plan (Figure 2) that depicted the most current boundaries of the asphalt cap. This figure is included in the attachments of this LTS report.
- The 2024 annual report was sent by International Paper to a RCRA Hazardous Waste Cleanup Program contact, the RCRA Corrective Action digital reporting documents repository mailbox, and the DEQ project manager, which addresses EPA Assessment Note #4 (noted as a second #3 in the assessment report).

Follow-up Activities:

A minor follow-up action is to revise the EPA Geospatial PDF to include the asphalt cap under the dock overhang as per Figure 2 of the 2014 Annual Inspection and Asphalt Cap Maintenance report. Figure 2 has been included as part of the attachments to this LTS report.

DEQ Long Term Stewardship Facility Map
International Paper-Richmond – Richmond, Virginia



Select Site Photos

Photos by: Stephanie Houston

April 9, 2025

Building Corner



At northern building corner facing East. Edge of asphalt cap.

Asphalt Cap Gap



At eastern side of building facing West. A gap between the building and asphalt cap has been reported since the 2018 Annual Inspection and Cap Maintenance Report. Gap does not appear to have increased significantly.

Overhang



At the eastern edge of the dock overhang facing West. Asphalt cap and new sealant were observed below the overhang adjacent to the dock.



At the northern edge of the dock overhang facing South. Asphalt cap and new sealant appear to extend below the overhang.

Sluice



At eastern edge of the Asphalt Cap facing east towards the sluice. The upper portion of the sluice starting from the Asphalt Cap has been replaced.



In the sluice facing East. Cracks were observed in the sluice. Facility stated that the cracks will be sealed.

Asphalt Repair 1 and 2



Asphalt Repair 1: Southern boundary of Asphalt Cap facing Southwest. Repairs were made in an area of asphalt surface deterioration noted in 2024 annual report.



Asphalt Repair 2: Eastern portion of Asphalt Cap facing East. Additional examples of repairs to the asphalt.

LTS Checklist: International Paper-Richmond

Site visit date: 4/9/2025

Time of visit: 10:00 am

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

- Janie Smith, International Paper
- David Copen, AECOM
- Stephanie Houston, VDEQ

<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		• Observations during the site visit noted asphalt below the overhang
• 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? When is the next report coming?	X		

<u>Groundwater Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is groundwater onsite used for potable purposes?		X	
• Is the Facility connected to a public water supply?	X		
• Have any new wells been installed at the facility?		X	

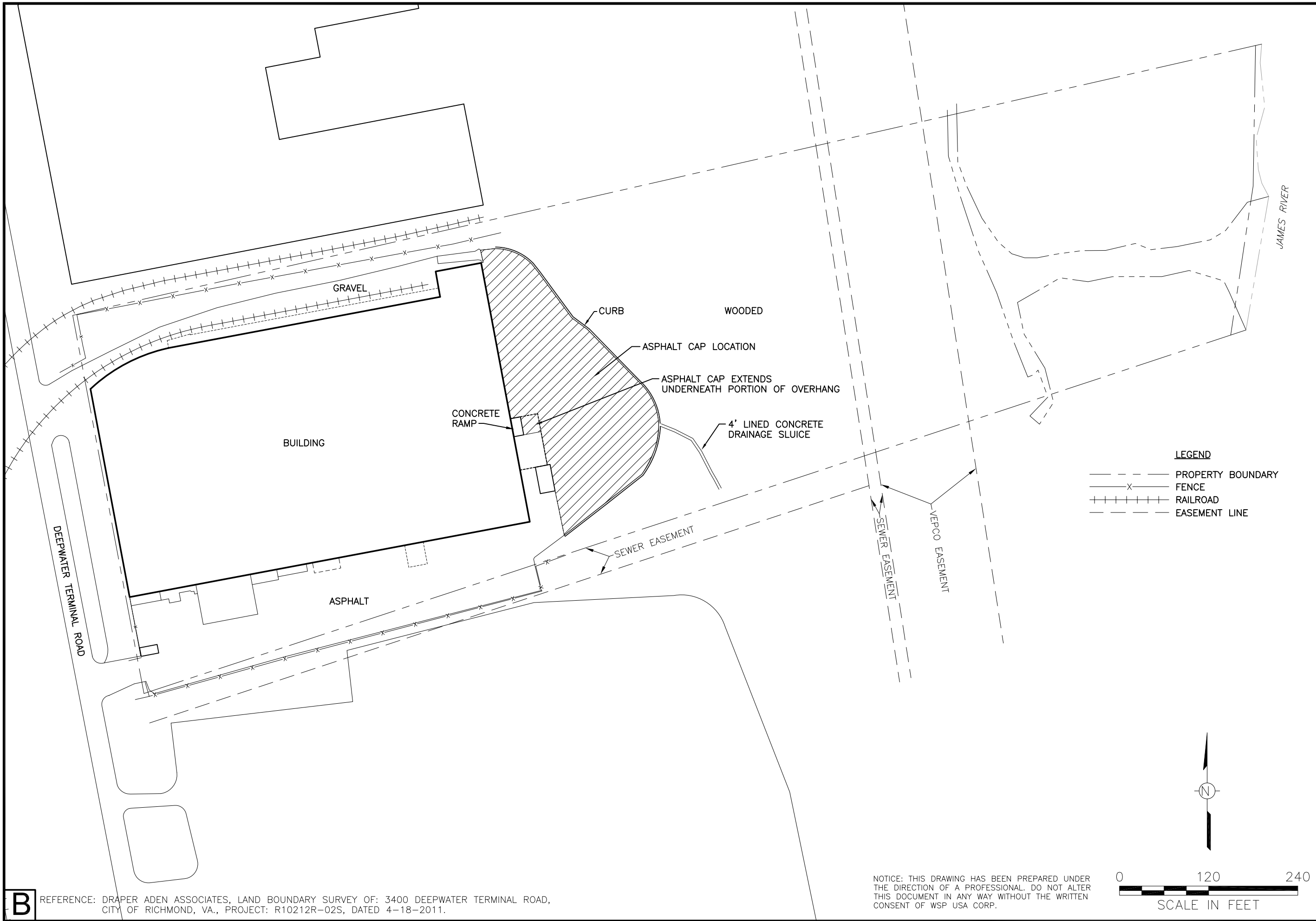
International Paper-Richmond
2025 Long-Term Stewardship Inspection

<u>Surface and Subsurface Soil 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 plans for such?		X	

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
<ul style="list-style-type: none"> • Has Asphalt Cap been properly maintained? • When is the next inspection? • When was last seal coating of the Asphalt Cap • Vegetation trimmed around cap? • Asphalt cap under overhang? 	X		<ul style="list-style-type: none"> • Last seal coating was March 2025 • Last seal coating included area below overhang
• Have any repairs been necessary? (i.e. regrading, filling, root removal) Last time it was repaired?	X		<ul style="list-style-type: none"> • Repairs completed <ul style="list-style-type: none"> ○ Seal coating March 2025 ○ Sluice – replaced upper part as of 12/18/2024, will seal cracks ○ Cleaned out gutters recently

Other Notes:

- Used only for distribution, no production
- The 2014 Annual Inspection and Asphalt Cap Maintenance report addressed multiple notes made during the 2014 LTS assessment:
 - The report noted that asphalt pavement was installed under the overhang on August 12, 2014, addressing EPA Assessment Note #1;
 - The added asphalt pavement under the overhang addressed EPA Assessment Note #2;
 - The report included a revised survey dated 10/13/2014 that corrected the original survey dated 4/18/2011 to reflect the original asphalt cap extents, which did not include coverage under the overhang to address EPA Assessment Note #3;
 - The report addressed repairs that were made on September 16, 2014 to the asphalt cap, which addressed the final note in the EPA assessment; and
 - The report included a Site Plan (Figure 2) that depicted the most current boundaries of the asphalt cap.
- The most recent annual report was sent by International Paper to a RCRA Hazardous Waste Cleanup Program contact, the RCRA Corrective Action digital reporting documents repository mailbox, and the DEQ project manager, which addresses EPA Assessment Note #4 (noted as a second #3 in the assessment report).



B

REFERENCE: DRAPER ADEN ASSOCIATES, LAND BOUNDARY SURVEY OF: 3400 DEEPWATER TERMINAL ROAD, CITY OF RICHMOND, VA., PROJECT: R10212R-02S, DATED 4-18-2011.

Drawn By:	EGC
Checked:	SKF
Approved:	<i>SKF</i>
DWG Name:	00003717-005

RICHMOND GRAVURE
RICHMOND, VIRGINIA
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MEMPHIS, TENNESSEE

Figure 2
SITE PLAN
ASPHALT CAP LOCATION

WSP
WSP USA Corp.
11190 Sunrise Valley Drive, Suite 300
Reston, Virginia 20191
(703) 709-6500
www.wspgroup.com/usa