

ORDNANCE SYSTEMS INC.
Radford Army Ammunition Plant
4050 Pepper's Ferry Road
Radford Virginia 24141

June 22, 2015

Mr. Ashby R. Scott
Title V Program Coordinator
Office of Waste Permitting and Compliance
Virginia Department of Environmental Quality
P.O. Box 1105
629 East Main Street
Richmond, Virginia 23218

**Subject: Corrective Action Permit Application
For Reissuance of Hazardous Waste Management Corrective Action Permit
Radford Facility Army Ammunition Plant, Radford, Virginia
EPA ID#: VA1210020730**

Dear Mr. Scott:

Please find the enclosed permit application package for the reissuance of the Hazardous Waste Management Corrective Action Permit for the Radford Army Ammunition Plant (RFAAP) located in Radford, Virginia. The draft permit was prepared following the submission instructions presented in the January 13, 2015 VDEQ correspondence with the following exception. In lieu of a redline strikeout version of the current Corrective Action Permit, the draft permit was prepared in the format specified by VDEQ (see attached June 19, 2014 email noted below).

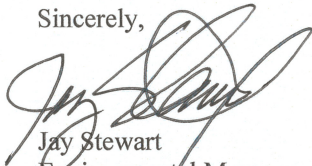
The draft permit includes a summary of the current status of the Solid Waste Management Unit(s) and an update of corrective action and associated activities since issuance of the current permit to meet the Part B application requirements (See Attachment B of draft permit). As requested, the following items are provided:

Permit Application – one hard copy with CD (Word and Adobe pdf formats)

- Part A – EPA Part A Application Form
- Part B - Draft Permit dated June 2015 as described above
- VDEQ Requested Format of Permit – Email from Jutta Schneider/K. Kochan, VDEQ to M. Lawless, CPG, P.G., Draper Aden Associates, dated June 19, 2014
- VDEQ Correspondence dated January 13, 2015- request for permit application submittal
- Copy of Application Fee Check

If you have any questions or concerns, please contact Mr. Matt Alberts at 540/639-8722 (matt.alberts@baesystems.com).

Sincerely,



Jay Stewart
Environmental Manager
BAE Systems, Ordnance Systems Inc.

Enclosure

c: Aziz Farahmand, VDEQ-BRRO (w/ enclosure)
Kurt W. Kochan, VDEQ-Central (w/ enclosure)
Jim Cutler, VDQ-CO

Rich Mendoza (w/enclosure)
U.S. Army Environmental Command
Cleanup and Munitions Response Division
2450 Connell Road, Bldg. 2264, 1st Floor, Room 126
Fort Sam Houston, TX 78234-7664

Tom Meyer (w/enclosure)
Corps of Engineers, Baltimore District
ATTN: CENAB-EN-HM
10 South Howard Street
Baltimore, MD 21201

Coordination: 
J. McKenna

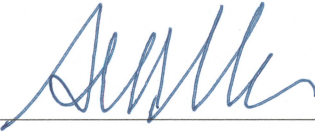
bc: Administrative File
J. Stewart, BAE Staff
J. McKenna, ACO Staff
Matt Alberts, BAE Staff
Mike Lawless, Draper Aden Associates

Concerning the following:

*Corrective Action Permit Application
For Reissuance of Hazardous Waste Management Corrective Action Permit
Radford Army Ammunition Plant, Radford, Virginia
EPA ID#: VA1210020730*

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

SIGNATURE:



PRINTED NAME:

Alicia M. Masson

TITLE:

Lieutenant Colonel, US Army
Commanding

SIGNATURE:




PRINTED NAME:

William M. Barnett

TITLE:

General Manager
BAE Systems

<p>SEND COMPLETED FORM TO: The Appropriate State or Regional Office.</p>	<p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # <u>N/A</u>)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)</p>		
<p>2. Site EPA ID Number</p>	<p>EPA ID Number <u>V</u> <u>A</u> <u>1</u> <u>2</u> <u>1</u> <u>0</u> <u>0</u> <u>2</u> <u>0</u> <u>7</u> <u>3</u> <u>0</u></p>		
<p>3. Site Name</p>	<p>Name: Radford Army Ammunition Plant</p>		
<p>4. Site Location Information</p>	<p>Street Address: State Route 114</p> <p>City, Town, or Village: Radford County: Mon/Pulaski</p> <p>State: Virginia Country: United States Zip Code: 24143</p>		
<p>5. Site Land Type</p>	<p><input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p>6. NAICS Code(s) for the Site (at least 5-digit codes)</p>	<p>A. <u>3</u> <u>2</u> <u>5</u> <u>3</u> <u>1</u> <u>1</u> c. <u>3</u> <u>3</u> <u>2</u> <u>9</u> <u>9</u> <u>2</u></p> <p>B. <u>3</u> <u>2</u> <u>5</u> <u>9</u> <u>2</u> D. <u>3</u> <u>3</u> <u>2</u> <u>9</u> <u>9</u> <u>3</u></p>		
<p>7. Site Mailing Address</p>	<p>Street or P.O. Box: P. O. Box 1</p> <p>City, Town, or Village: Radford</p> <p>State: Virginia Country: United States Zip Code: 24143</p>		
<p>8. Site Contact Person</p>	<p>First Name: Matthew MI: J Last: Alberts</p> <p>Title: Environmental Specialist, BAE Systems</p> <p>Street or P.O. Box: 4050 Peppers Ferry Road, P. O. Box 1</p> <p>City, Town or Village: Radford</p> <p>State: Virginia Country: United States Zip Code: 24143</p> <p>Email: matt.alberts@baesystems.com</p> <p>Phone: 540-639-8722 Ext.: Fax: N/A</p>		
<p>9. Legal Owner and Operator of the Site</p>	<p>A. Name of Site's Legal Owner: U. S. Army Date Became Owner: 04/01/1941</p> <p>Owner Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>Street or P.O. Box: P. O. Box 2</p> <p>City, Town, or Village: Radford Phone:</p> <p>State: Virginia Country: United States Zip Code: 24143</p> <p>B. Name of Site's Operator: BAE Systems, Ordnance Systems Inc. Date Became Operator: 07/01/2012</p> <p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

10. Type of Regulated Waste Activity (at your site)
 Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.

- Y N **1. Generator of Hazardous Waste**
 If "Yes," mark only one of the following – a, b, or c.
- a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.
- b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.
- c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.
- If "Yes" above, indicate other generator activities in 2-10.

- Y N **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.
- Y N **3. United States Importer of Hazardous Waste**
- Y N **4. Mixed Waste (hazardous and radioactive) Generator**

- Y N **5. Transporter of Hazardous Waste**
 If "Yes," mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)
- Y N **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.
- Y N **7. Recycler of Hazardous Waste**
- Y N **8. Exempt Boiler and/or Industrial Furnace**
 If "Yes," mark all that apply.
- a. Small Quantity On-site Burner Exemption
- b. Smelting, Melting, and Refining Furnace Exemption
- Y N **9. Underground Injection Control**
- Y N **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

- Y N **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.**
- a. Batteries
- b. Pesticides
- c. Mercury containing equipment
- d. Lamps
- e. Other (specify) _____
- f. Other (specify) _____
- g. Other (specify) _____
- Y N **2. Destination Facility for Universal Waste**
 Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

- Y N **1. Used Oil Transporter**
 If "Yes," mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)
- Y N **2. Used Oil Processor and/or Re-refiner**
 If "Yes," mark all that apply.
- a. Processor
- b. Re-refiner
- Y N **3. Off-Specification Used Oil Burner**
- Y N **4. Used Oil Fuel Marketer**
 If "Yes," mark all that apply.
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y N 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- a. College or University
- b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y N 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D018	D030	D035
F003	F005	F039	K044	K045	K047	K111
P042	P081	U002	U069	U080	U088	U102
U105	U108	U117	U134	U151	U154	U159
U213						

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

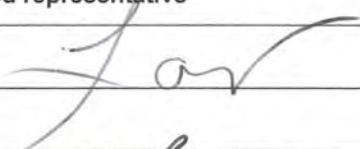

Y N Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

The Radford Army Ammunition Plant (RFAAP) is a government-owned, contractor-operated industrial installation responsible to the U. S. Army and is operated by BAE Systems, Ordnance Systems Inc. The mission at the RFAAP is to manufacture energetics for the U. S. Army and allies. Additionally, commercial producers operate and lease portions of the RFAAP through facility use arrangements.

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Luis A. Ortiz LTC, US Army Commanding	06/08/2015
	William M. Barnett General Manager, BAE Systems	06/02/2015

ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY



ONLY fill out this form if:

- ❖ You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; **AND**
- ❖ You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) or you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

1. Indicate reason for notification. Include dates where requested.

- Facility will begin managing excluded HSM as of _____ (mm/dd/yyyy).
- Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.
- Facility has stopped managing excluded HSM as of _____ (mm/dd/yyyy) and is notifying as required.

2. Description of excluded HSM activity. Please list the appropriate codes and quantities in **short tons** to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

a. Facility code (answer using codes listed in the Code List section of the instructions)	b. Waste code(s) for HSM	c. Estimated short tons of excluded HSM to be managed annually	d. Actual short tons of excluded HSM that was managed during the most recent odd-numbered year	e. Land-based unit code (answer using codes listed in the Code List section of the instructions)

3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi). (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y N Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?

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United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	First Name: Charles	MI: E	Last Name: Saks
	Contact Title: Public Affairs Officer		
	Phone: 540-731-5785	Ext.:	Email: charles.e.saks3.civ@mail.mil
2. Facility Permit Contact Mailing Address	Street or P.O. Box: P. O. Box 2		
	City, Town, or Village: Radford		
	State: Virginia		
	Country: United States	Zip Code: 24143	
3. Operator Mailing Address and Telephone Number	Street or P.O. Box: P. O. Box 1		
	City, Town, or Village: Radford		
	State: Virginia	Phone: 540-639-7631	
	Country: United States	Zip Code: 24143	
4. Facility Existence Date	Facility Existence Date (mm/dd/yyyy): 04/01/1941		

5. Other Environmental Permits

A. Facility Type <i>(Enter code)</i>	B. Permit Number	C. Description
E	2 0 6 5 6	Air Registration/Title V Permit
N	V A 0 0 0 0 2 4 8	Wastewater
R	V A 1 2 1 0 0 2 0 7 3 0	Post Closure Care - HWMU 5, 16
R	V A 1 2 1 0 0 2 0 7 3 0	Corrective Action
R	V A 1 2 1 0 0 2 0 7 3 0	Subpart X
R	V A 1 2 1 0 0 2 0 7 3 0	Subpart O
E	1 1 2 1 6 4 3	Drinking Water (Bldg 419)
E	1 1 5 5 6 4 5	Drinking Water (Bldg 474)
R	S W P 4 0 1	Closed Sanitary Landfill
R	S W P 3 5 3	Closed Industrial Waste Landfill
R	S W P 4 3 3	Active Construction Debris Landfill

6. Nature of Business: The Radford Army Ammunition Plant (RFAAP) is a government-owned, contractor-operated industrial installation responsible to the U. S. Army and is operated by BAE Systems, Ordnance Systems Inc. The mission at the RFAAP is to manufacture energetics for the U. S. Army and allies. Additionally, commercial producers operate and lease portions of the RFAAP through facility use arrangements.

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

- A. PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For “other” processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.
- B. PROCESS DESIGN CAPACITY** – For each code entered in Item 7.A; enter the capacity of the process.
- AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 - UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.
- C. PROCESS TOTAL NUMBER OF UNITS** – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity	Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal			Treatment (Continued) (for T81 – T94)		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	
Storage			T87	Smelting, Melting, or Refining Furnace	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
S99	Other Storage	Any Unit of Measure Listed Below	T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Treatment			Miscellaneous (Subpart X)		
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T02	Surface Impoundment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below
Unit of Measure		Unit of Measure Code	Unit of Measure		Unit of Measure Code
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Short Tons Per Day	N	Cubic Meters	C
Gallons Per Day	U	Metric Tons Per Hour	W	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	X	Hectare-meter	F
		Million BTU Per Hour	X	BTU Per Hour	I

7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only					
					(1) Amount (Specify)	(2) Unit of Measure							
X 1	S	0	2		533.788	G	001						
1 1	S	0	2		1900	G	001						
2	T	0	3		2061	J	001						
3	X	0	1		4	N	001						
4	S	0	2		1900	G	001						
5	T	0	3		2061	J	001						
6													
7													
8													
9													
1 0													
1 1													
1 2													
1 3													

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only					
					(1) Amount (Specify)	(2) Unit of Measure							
X 2	T	0	4		100.00	U	001						
6	T	0	4		11	D	001						

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

- A. EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 9.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES															
	(1) PROCESS CODES (Enter Code)										(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))												
X	1	K	0	5	4	900	P	T	0	3	D	8	0										
X	2	D	0	0	2	400	P	T	0	3	D	8	0										
X	3	D	0	0	1	100	P	T	0	3	D	8	0										
X	4	D	0	0	2																		Included With Above

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES								
	(1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))							
1	D	0	0	1	1,200,000	P	S	0	2	T	0	3	T	0	4	
2	D	0	0	3												Included with above
3	D	0	0	5												Included with above
4	D	0	0	8												Included with above
5	D	0	3	0												Included with above
6	D	0	0	1	500,000	P	X	0	1							
7	D	0	0	3												Included with above
8	D	0	0	5												Included with above
9	D	0	0	8												Included with above
10	D	0	3	0												Included with above
11																
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10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

11. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

12. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

13. Comments

Section 7. Facility has two units (HWMU 5 and HWMU 16) in post closure care. T03 capacity of 2061 lb/hr is from the hazardous waste combustion NESHAP notice of compliance submitted with letter dated 04/22/2010. X01 capacity of 4 tons/day is from the Subpart X permit effective date 2005.

Section 8. Line number 6 is a pre-incinerator grinder process unit. Slurry is typical 3.5 parts water per one part solid. Capacity is calculated by: $[(2061 \text{ lb/hr} \times 2 \text{ incinerators} \times 24 \text{ hr/day}) / 4.5 \text{ total parts}] / 2000 \text{ lb/ton} = 11 \text{ tons/day}$

Part A Permit Attachments

Item 10 – Map

Figure 1. Topographic map showing:

- Legal boundaries of facility
- Processes
 - Incinerators
 - S02/S02
 - T03/T03
 - T04
 - OBG (Open Burning Ground)
 - X01
 - Springs and water bodies
 - HWMU (Hazardous Waste Management Unit in Post-Closure Care)

Item 11 – Facility Drawings

Figure 2. Topographic Map Showing:

- Legal boundaries of facility
- Processes
 - Incinerators
 - S02/S02
 - T03/T03
 - T04
 - OBG (Open Burning Ground)
 - X01
 - HWMU (Hazardous Waste Management Unit in Post-Closure Care)

Figure 3. Radford Army Ammunition Plant Installation Restoration Program Sites

Item 12 – Photographs

- Figure 4 Pre-incinerator Grinder
- Figure 5 Incinerator 440
- Figure 6 Incinerator 441
- Figure 7 Open Burning Ground Aerial View
- Figure 8 Hazardous Waste Management Unit 5
- Figure 9 Hazardous Waste Management Unit 16

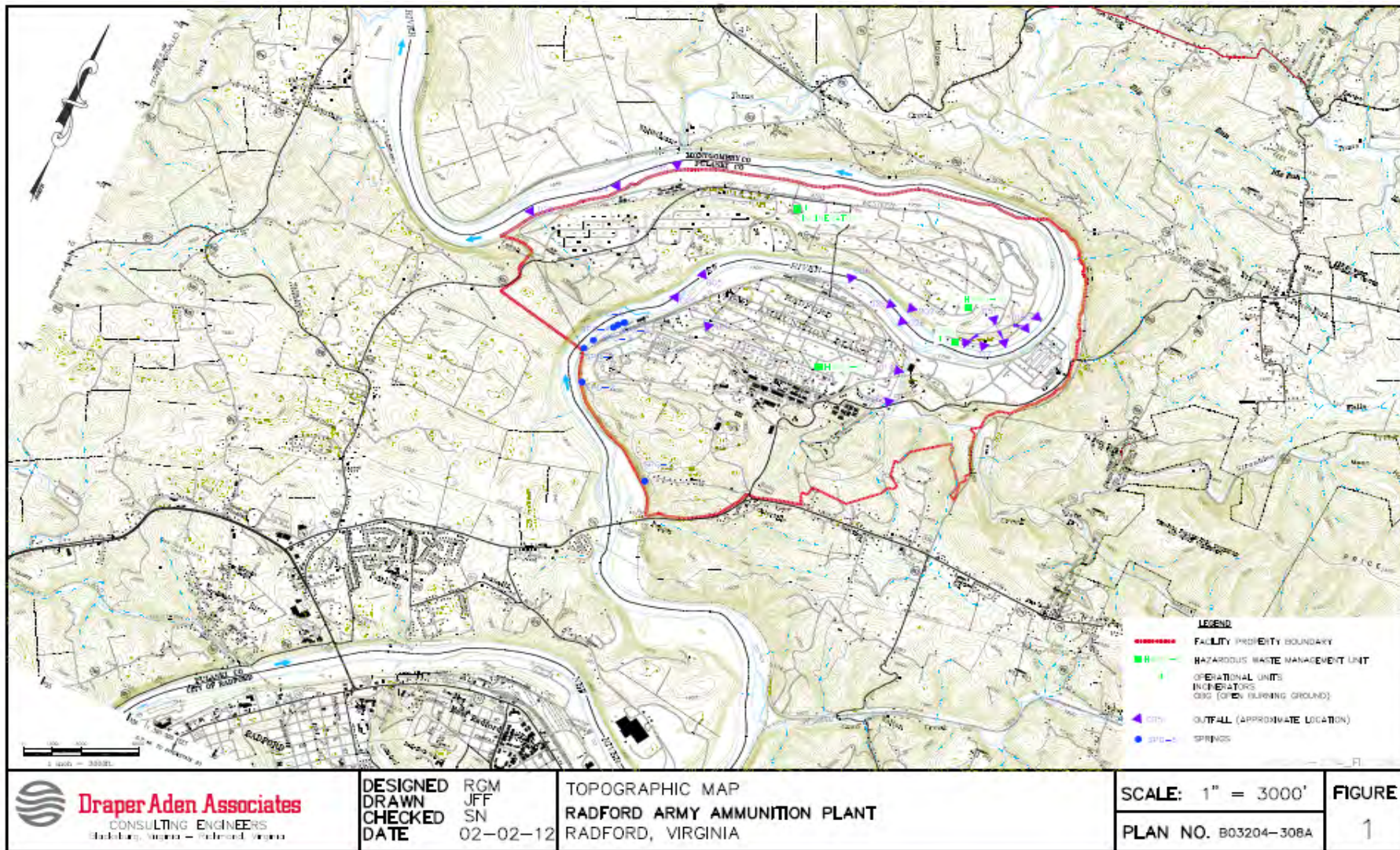
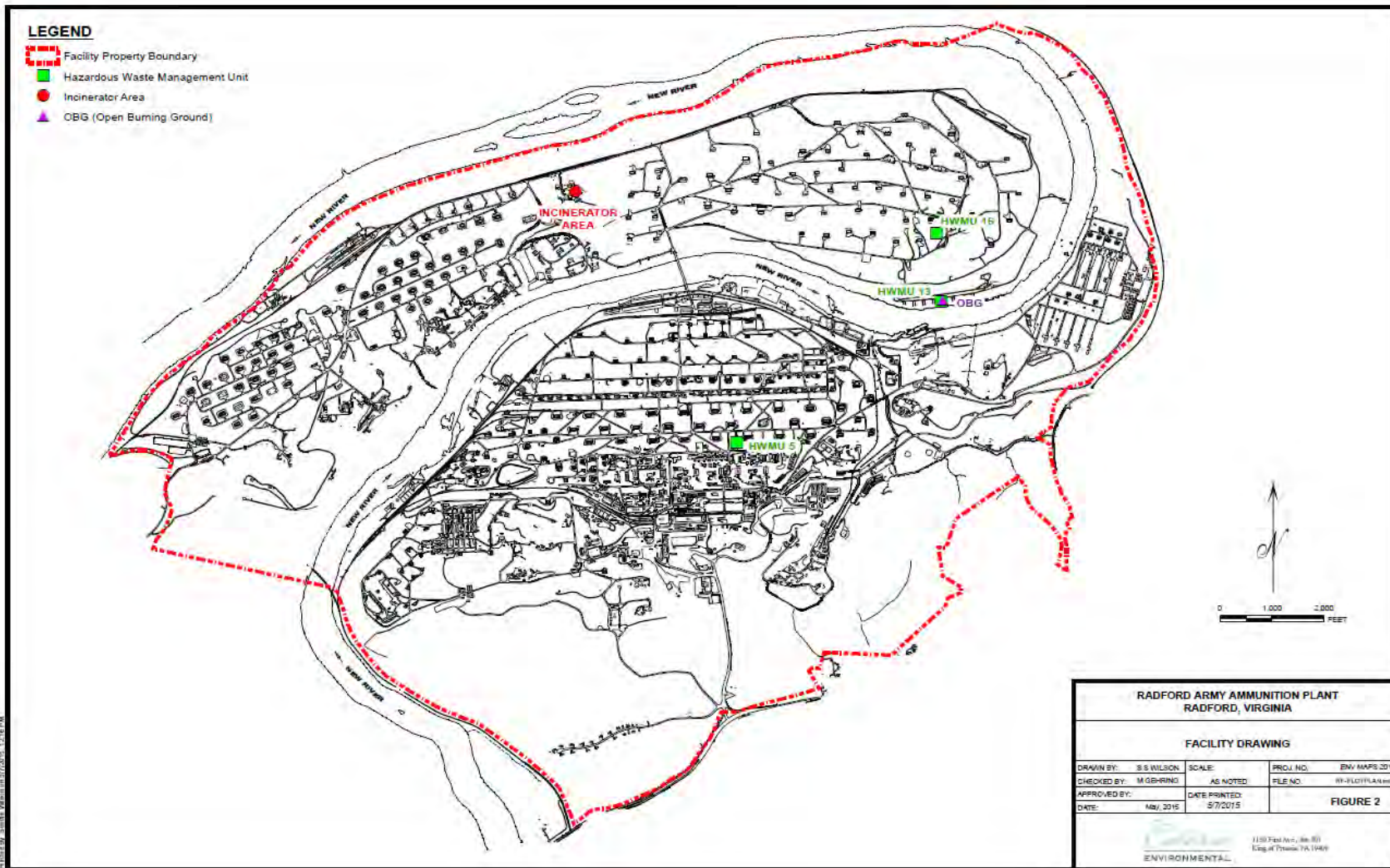


Figure 1. Topographic Map

- Incinerators:
 - S02/S02
 - T03/T03
 - T04
- OBG (Open Burning Ground)
 - X01

EPA ID Number: VA1210020730
 Radford Army Ammunition Plant



- Incinerators:
- S02/S02
- T03/T03
- T04
- OBG (Open Burning Ground)
- X01

Figure 2. Facility Drawing

Radford Army Ammunition Plant Installation Restoration Program Sites

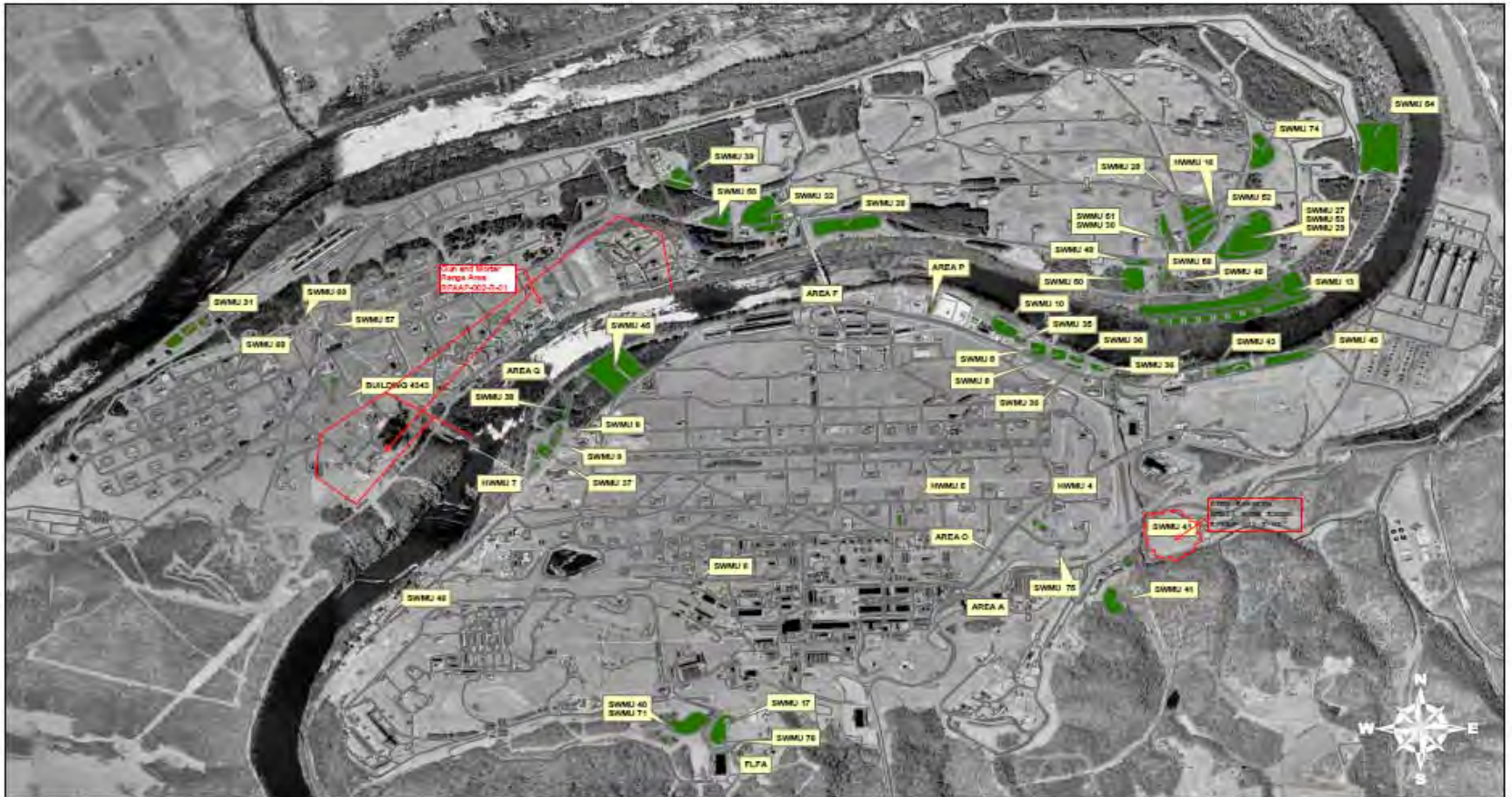


Figure 3. Radford Army Ammunitions Plant Installation Restoration Programs Sites

**Attachment to Figure 3
LIST OF UNITS**

1. Solid Waste Management Units (SWMUs)

SWMU 6	Acid Wastewater Lagoon (NFA)
SWMU 8	CaSO ₄ Treatment/Disposal Area (NFA)
SWMU 9	CaSO ₄ Treatment/Disposal Area
SWMU-10	Bio-plant Basin (Clean closed – 2013)
SWMU 13	Area Outside Open Burning Ground (OBG)
SWMU 17	Air Curtain Destructor and Open Burning Ground
SWMU-26	Fly Ash Landfill #1 (Closed as Permit 399)
SWMU-27	CaSO ₄ Treatment/Disposal Area (Closed as Permit 353/Post-closure Care)
SWMU-28	Closed Sanitary Landfill (Closed as Permit 401)
SWMU-29	Fly Ash Landfill #2 (Closed as Permit 353/Post-Closure Care)
SWMU 31	Coal Ash Settling Lagoons
SWMU-32	Inert Landfill #1 (Closed as Permit 400)
SWMU 35	CaSO ₄ Treatment/Disposal Area
SWMU 36	CaSO ₄ Drying Bed (NFA)
SWMU 37	CaSO ₄ Treatment/Disposal Area
SWMU 38	CaSO ₄ Treatment/Disposal Area
SWMU 39	Wastewater Ponds from Propellant Incinerator
SWMU 40	Landfill Nitro Area
SWMU 41	Red Water Ash Burial Ground
SWMU 43	Sanitary Landfill #2
SWMU 45	Landfill #3
SWMU 46	Propellant Burial (NFA)
SWMU 48	Oily Water Burial Area
SWMU 49	Red Water Ash Burial #2
SWMU 50	CaSO ₄ Treatment/Disposal Area
SWMU 51	TNT Waste Neutralization Pits
SWMU-52	Closed Sanitary Landfill (Closed as Permit 401)
SWMU-53	Activated Carbon Disposal Area (Closed as Permit 353/Post Closure Care)
SWMU 54	Propellant Burning Ash Disposal Area
SWMU 57	Pond by Building 4931/4932
SWMU 58	Rubble Pile (NFA)
SWMU 59	Bottom Ash Pile
SWMU 61	Mobile Waste Oil Tanks
SWMU 68	Chromic Acid Treatment Plant Tanks (NFA)
SWMU 69	Pond by Chromic Acid Treatment Plant Tanks (NFA)
SWMU 71	Flash Burn Parts Area
SWMU 74	Insert Landfill #3 (Active – SWP 433)
SWMU 75	Waste Oil Underground Storage Tank (Inert Gas Plant) (NFA)
SWMU 76	Waste Oil Underground Storage Tanks (NFA)

2. **Areas of Concern (AOCs)**

AOC A	Nitrocellulose Rainwater Ditch
AOC F	Former Drum Storage Area (NFA)
AOC O	Underground Fuel Oil Spill
AOC P	Battery Storage Area
AOC Q	CaSO ₄ Treatment/Disposal Area
AOC Bldg 4343	Former Cadmium Plating Facility (NFA)
AOC FLFA	Former Lead Furnace Area

3. **Hazardous Waste Management Units (HWMUs)**

HWMU 4	Surface Impoundment #4 (Clean-closed – August 16, 2007)
HWMU 5	Surface Impoundment #5 (Post-closure care Permit)
HWMU 7	Surface Impoundment #7 (Clean-closed – 2009)
HWMU 16	Hazardous Waste Landfill (Post-closure Care Permit)

4. **Military Munitions Response Program**

Former Gun and Mortar Range
Army Reserve Small Arms Range

EPA ID Number: VA1210020730
Radford Army Ammunition Plant



Figure 4. Pre-incinerator Grinder Bldg 442 (Process Code T04 – February 2012)

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Radford Army Ammunition Plant



Figure 5. Incinerator 440 (Process Codes S02 and T03 – February 2012)

EPA ID Number: VA1210020730
Radford Army Ammunition Plant



Figure 6. Incinerator 441 (Process Codes S02 and T03 – February 2012)

EPA ID Number: VA1210020730
Radford Army Ammunition Plant



Figure 7. Open Burning Ground Aerial View (Process Code X01 – October 2006)



Figure 8. Hazardous Waste Management Unit 5 (Post Closure Care Permit – February 2012)

EPA ID Number: VA1210020730
Radford Army Ammunition Plant



Figure 9. Hazardous Waste Management Unit 16 (Post Closure Care Permit – February 2012)

**Hazardous Waste Management Permit
For
Corrective Action**

**Radford Army Ammunition Plant
Radford, Virginia**

EPA ID No. VA1210020730

June 22, 2015

SIGNATURE PAGE

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Attachment A Facility Map of RCRA Corrective Action Units – Figure 1
Summary of Corrective Action Units Final Remedies – Table 1

Attachment B Facility Background, Corrective Action Unit Descriptions and Environmental
Descriptions

Attachment C Remedial Clean-Up Goals and Exit Strategy

DEFINITIONS

For the purposes of this Permit, the following definitions shall apply:

- a. The term "**Permit**" shall mean the Permit issued by the Virginia Department of Environmental Quality, pursuant to Chapter 14, Article 4, Title 10.1, Code of Virginia (1950), as amended, and the Virginia Hazardous Waste Management Regulations (VHWMR) as codified in Title 9 of the *Virginia Administrative Code*, Agency 20, Chapter 60 (9 VAC 20-60).
- b. The term "**Director**" shall mean the Director of the Virginia Department of Environmental Quality or his designated representative.
- c. The term "**Department**" shall mean the Virginia Department of Environmental Quality (VDEQ), (with the address as specified in Permit Condition I.I.4).
- d. The terms "**facility**" or "**site**" shall mean all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. For the purpose of implementing corrective action under 40 CFR § 264.101, "facility" means all contiguous property under the control of the owner or operator under a permit under Subtitle C of RCRA. The Radford Army Ammunition Plant (RFAAP) facility in Radford, Virginia, is identified in the physical description of the property (including structures, appurtenances, and improvements). The facility map is provided as Attachment A of this Permit.
- e. The term "**corrective action unit**" (CAU) is a contiguous area of land on or in which hazardous waste is placed. Examples of corrective action units consist of Solid Waste Management Units (SWMUs), Areas of Concern (AOCs), Site Screening Areas (SSAs) and Miscellaneous Units (MUs). A container alone does not constitute a unit; the unit includes containers and the land or pad upon which they are placed.
- e. The term "**hazardous waste management unit**" is a contiguous area of land on or in which hazardous waste is placed. Examples of hazardous waste management units include burial areas, burning areas, burning grounds, neutralization pits, disposal trenches, a wastewater sump, landfill cells, small arms and mortar ranges.
- f. The term "**release**" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste or hazardous constituents.
- g. The term "**Area of Concern**" shall mean an area at the facility or an off-site area, which is not at this time known to be a solid waste management unit, where hazardous waste and/or hazardous constituents are present or are suspected to be present as a result of a release from the facility.

- h. The term “**Hazardous Constituent**” shall mean a constituent that caused the Administrator to list the hazardous waste in 40 CFR 261, subpart D or a constituent listed in Table 1 of 40 CFR 261.24.
- i. The term “**Permittee**” refers to both the U.S. Army (owner) and BAE Systems Ordnance Systems Inc. (Operator).
- j. The term “**EPA**” shall mean United States Environmental Protection Agency.
- k. The term “**Solid Waste Management Unit**” shall mean any discernable unit at the facility from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous wastes. Such units include any area at a facility which solid wastes have been routinely and systematically released.
- l. The term “**Days**” shall mean calendar days except as otherwise provided herein.
- m. All definitions contained in 40 CFR Sections 124.2, 260.10, 270.2, 264.141, 264.1031, 264.1051, 264.1081, and 9 VAC 20-60 are hereby incorporated, in their entirety, by reference into this Permit. Any of the definitions used above, (a) through (f), shall supersede any definition of the same term given in 40 CFR Sections 124.2, 260.10, 270.2, 264.141, 264.1031, 264.1051, 264.1081, and 9 VAC 20-60. Where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.
- n. Throughout the Permit, all references to 40 C.F.R. Parts 261-266, 268, 270, 273, 279, are as adopted by reference in the *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60

ABBREVIATIONS AND ACRONYMS

For the purposes of this Permit, the following abbreviations and acronyms shall apply:

AOC	Area of Concern
ARSAR	Army Small Arms Range
BAE	BAE Systems, Ordnance Systems Inc.
CA	Corrective Action
CAU	Corrective Action Unit
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CMS	Corrective Measures Study
COPCs	Constituents of Potential Concern
ECs	Engineering Controls
EPA	United States Environmental Protections Agency
FDRTC	Final Decision and Response to Comments
HHRA	Human Health Risk Assessment
HW	Hazardous Waste
ICs	Institutional Controls
IMs	Interim Measures
IRP	Installation Restoration Program
LTR	Long-Term Monitoring
MCLs	Maximum Contaminant Levels
MEC	Munitions and Explosives of Concern
MMA	Main Manufacturing Unit
MMRP	Military Munitions Response Program
MNA	Monitored Natural Attenuation
NFA	No Further Action
NRU	New River Unit
OBG	Open Burning Ground
O&M	Operation and Maintenance
PAHs	Poly-aromatic Hydrocarbons
PCBs	Polychlorinated Biphenyls
RCRA	Resource Conservation and Recovery Act
RFAAP	Radford Army Ammunition Plant
RFI	RCRA Facility Investigation
RSLs	Risk Screening Levels
SB	Statement of Basis
SSA	Site Screening Area
SVOC	Semivolatile Organic Compound
SWMU	Solid Waste Management Unit
TNT	Trinitrotoluene
VDEQ	Virginia Department of Environmental Quality
VELAP	Virginia Environmental Laboratory Accreditation Program
VHWMR	Virginia Hazardous Waste Management Regulations

MODULE I – STANDARD CONDITIONS

I.A. EFFECT OF PERMIT

- I.A.1. This Permit, issued by the Director pursuant to 40 CFR § 270.1(c)(4), authorizes only the management of hazardous waste under corrective action (CA) expressly described in this Permit and in accordance with the conditions of this Permit and with the applicable provisions of the VHWMR under 9 VAC 20-60. Any management of hazardous waste by the Permittee which is not authorized by this Permit or 9 VAC 20-60, and for which a permit is required under Chapter 14, Article 4, Title 10.1, Code of Virginia (1950), as amended, is prohibited. (40 CFR §§ 270.30(g) and 270.4(b) and (c)) Compliance with this Permit generally constitutes compliance, for the purposes of enforcement, with Chapter 14, Article 4, Title 10.1-1426, Code of Virginia (1950), as amended. This Permit does not convey any property rights of any sort, or any exclusive privilege. Possession of a permit does not authorize any injury to persons or property or invasion of other private rights, or any infringement of Commonwealth of Virginia or local laws or regulations. Compliance with the terms of this Permit may not constitute a defense to any action brought under Chapter 14, Article 8, Code of Virginia (1950), as amended, or any other Commonwealth law governing protection of the public health or the environment.
- I.A.2. The Permittee is obligated to complete facility-wide CA under the conditions of a RCRA Permit regardless of the operational status of the facility. The Permittee must submit an application for a new Permit at least 180-days before this Permit expires pursuant to 40 CFR § 270.10(h), unless the Permit has been modified to terminate the CA schedule of compliance and the Permittee has been released from the requirements for financial assurance for corrective action.

I.B. PERMIT ACTIONS

- I.B.1. This Permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §§ 124.5, 270.30(f), 270.41, 270.42, and 270.43. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance does not stay the applicability or enforceability of any permit condition (40 CFR § 270.30(f)).
- I.B.2. Permit modifications at the request of the Permittee shall be done as specified by 40 CFR § 270.42.

- I.B.3. This Permit may be renewed as specified in 9 VAC 20-60-270.10 and 40 CFR § 270.109(h), and permit condition I.D.2. Review of any application for a permit renewal shall consider improvements in the state of control and measurement technology, as well as changes in applicable regulations.

I.C. SEVERABILITY

- I.C.1. The provisions of this Permit are severable, and if any provision of this Permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any Commonwealth or federal statutory or regulatory provision which forms the basis for any condition of this Permit does not affect the validity of any other Commonwealth or Federal statutory or regulatory basis for said condition. (40 CFR § 124.16(a)(2)).
- I.C.2. In the event that a condition of this Permit is stayed for any reason, the Permittee shall continue to comply with the related applicable and relevant interim status standards in 40 CFR § 270.10(e) until final resolution of the stayed condition unless the Director determines compliance with the related applicable and relevant interim status standards would be technologically incompatible with compliance with other conditions of this Permit which have not been stayed.

I.D. DUTIES AND REQUIREMENTS

- I.D.1. Duty to Comply
The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit under 40 CFR § 270.61. Any other noncompliance with the Permit constitutes a violation of Title 10.1 Code of Virginia (1950), as amended, and regulations promulgated thereunder is grounds for enforcement action, Permit termination, revocation and reissuance, modification, or denial of a permit renewal application. (40 CFR § 270.30(a))
- I.D.2. Duty to Reapply
If the Permittee wishes to or is required to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittee shall apply for and obtain a new permit as specified below.
- a. The Permittee shall submit a new and complete permit application for a new Permit at least 180 days before the Permit expires, unless a later date has been approved by the Director.
 - b. Pursuant to 40 CFR § 270.10(h), the Director shall not grant permission for an application to be submitted later than the expiration date of the existing permit (40 CFR § 270.30(b)).

I.D.3. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense in an enforcement action to argue that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit (40 CFR § 270.30(c)).

I.D.4. Duty to Mitigate

In the event of noncompliance with the Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment (40 CFR § 270.30(d)).

I.D.5. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and controls (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit (40 CFR § 270.30(e)).

I.D.6. Duty to Provide Information

The Permittee shall furnish to the Director within a reasonable time, any pertinent information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit (40 CFR § 270.30(h)).

I.D.7. Inspection and Entry

The Permittee shall allow the Director or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- a. Enter at reasonable times upon the premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of this Permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

- d. Sample or monitor at reasonable times for the purposes of assuring permit compliance or as otherwise authorized by VHWMR, any substances or parameters at any location (40 CFR § 270.30(i)).

I.D.8. Reporting Planned Changes

The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility (40 CFR § 270.30(l)(1)). This notice shall include a description of all incidents of noncompliance reasonably expected to result from the proposed changes.

I.D.9. Anticipated Noncompliance

The Permittee shall give advance written notice to the Director of any planned changes in the permitted facility or activity that may result in noncompliance with Permit requirements (40 CFR § 270.30(l)(2)).

I.D.10. New and Modified Portions of Any Waste Management Unit

The Permittee shall not store or treat hazardous waste in any new or modified portion of the facility, except as provided in 40 CFR § 270.42, until the Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a professional engineer registered by the Commonwealth stating that the facility has been constructed or modified in compliance with the Permit; and:

- a. The Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the Permit; or
- b. Within 15 days of the date of submission of the letter required pursuant to permit condition I.D.10, if the Permittee has not received notice from the Director of his intent to inspect, prior inspection is waived and the Permittee may commence treatment of hazardous waste (40 CFR § 270.30(l)(2)).

I.D.11. Twenty-four Hour Reporting

The Permittee shall report to the Director any noncompliance which may endanger human health or the environment. Information shall be provided orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances. The information specified (a, b, and c) shall be reported orally within 24 hours:

- a. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
- b. Any information of a release or discharge of hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility.
- c. The description of the occurrence and its cause shall include at least the following:

- i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Names and quantities of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident (40 CFR § 270.30(l)(6)).
- d. A written submission shall also be provided to the Director within five (5) days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated duration of noncompliance; the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The Director may waive the 5-day notice requirement in favor of a written report within fifteen (15) days (40 CFR § 270.30(l)(6)(iii)).

I.D.12. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports are submitted. The reports shall contain the information listed in permit condition I.D.11 (40 CFR § 270.30(l)(10)).

I.D.13. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Director, the Permittee shall promptly submit such facts or information to the Director (40 CFR § 270.30(l)(11)).

I.E. MONITORING AND RECORDS

I.E.1. Monitoring Reports

Monitoring shall be performed and results shall be reported at the intervals specified in the Permit.

I.E.2. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity (40 CFR § 270.30 (j)(1)). The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method specified in 40 CFR 261, Appendix I, or an equivalent method approved by the EPA. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846* (3rd ed.; November, 1986, as updated), *Standard Methods of Wastewater Analysis* (16th ed.; 1985, as updated), or an equivalent method approved by the EPA. Additionally, the laboratory must be accredited for the analytical method, matrix and target analyte (where applicable) by the Virginia Environmental Laboratory Accreditation Program (VELAP).

I.E.3. The Permittee shall retain records of monitoring information, including calibration and maintenance records, and original strip chart recordings for continuous monitoring instrumentation, copies of reports and records required by this Permit, certifications required by 40 CFR § 264.73(b)(9), and records of data used to complete the application for this Permit, for a period of at least 3 years (or longer if specified elsewhere in this Permit) from the date of the sample collection, measurement, report, certification, or application. These retention periods may be extended by the request of the Director at any time and are automatically extended during the course of any unresolved enforcement actions regarding this facility. The Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.

Records of monitoring information shall include at a minimum:

- a. The date, exact place, and time of sampling or measurements;
- b. The individual(s) who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. The individual(s) who performed the analyses;
- e. The analytical techniques or test methods used; and
- f. The results of such analyses. (40 CFR § 270.30(j))

I.F. COMPLIANCE NOT CONSTITUTING DEFENSE

Compliance with the terms of this Permit does not constitute a defense to any action brought under Chapter 14, Article 8 of Title 10.1, Code of Virginia (1950) as amended or any other Commonwealth law governing protection of the public or the environment.

I.G. TRANSFER OF PERMITS

This Permit is not transferable to any person except after notice to the Director (40 CFR § 270.30(l)(3)). This Permit may be transferred by the Permittee to a new owner or operator only if the Permit has been modified or revoked and reissued under 40 CFR § 270.40(b) or § 270.42(b)(2) to identify the new Permittee and to incorporate such other requirements as may be necessary under the RCRA (40 CFR § 270.40). Before transferring ownership or operation of the facility during its operation life, the Permittee shall notify the new owner or operator in writing of the requirements of 9 VAC 20-60-264 and 40 CFR Part 264 and 270 and at the same time shall send a copy of such notice to the Director (40 CFR § 264.12(c)).

I.H. PERMIT EXPIRATION AND CONTINUATION

Pursuant to 9 VAC 20-60-270 B 15 this Permit will remain in force until the effective date of a new permit if the Permittee has submitted a timely, complete application pursuant to Permit Condition I.D.2.a., and through no fault of the Permittee, the Director has not issued a new permit with an effective date on or before the expiration date of this Permit. All conditions of the continued Permit shall remain fully effective and enforceable (40 CFR § 270.51).

I.I. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE DEPARTMENT

I.I.1. Reporting

The Permittee shall submit a groundwater monitoring and remedial measures effectiveness report. The report shall be submitted upon completion of data collection for a year. The report shall be submitted within 120 days after receiving the final analytical data from the laboratory.

At a minimum, the report will include groundwater monitoring results for each monitoring event including applicable summary tables and figures. Specific reporting requirements are presented in the approved work plan for the unit.

This report may be combined with other reporting required in the approved work plans as referenced in Section II.B.3.

I.I.2. Duty to Submit Certified Documents

All work plans, reports, notifications or other submissions which are required by this Permit to be sent or given to the Director shall be sent certified mail, sent by certified carrier (including overnight commercial delivery services), electronic submission or be hand-delivered to:

**Department of Environmental Quality
Groundwater/Corrective Action Program Manager
Office of Remediation Programs
PO Box 1105
Richmond, Virginia 23218
Telephone Number (804) 698-4099**

**Street Address:
629 East Main Street
Richmond, Virginia 23219**

And one (1) copy of all such correspondence, reports, and submissions shall also be sent to:

**Deputy Director, Blue Ridge Regional Office
Department of Environmental Quality
3019 Peters Creek Road
Roanoke, Virginia 24019
Telephone Number (540) 562-6700**

**Associate Director, Office of Remediation
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029
Mail Code: (3LC20)**

I.I.3. Signatory Requirements

All applications, work plans, reports, and other information submitted shall be signed and certified as specified by 40 CFR § 270.11.

I.J. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE

I.J.1. Current copies of the following documents, as amended, revised, and modified, shall be maintained at the facility. These documents shall be maintained until corrective action is completed and certified by the Permittee and by an independent, Virginia-registered professional engineer, unless a lesser time is specified in the Permit.

- a. The Permit, including all attachments;
- b. All Part A and B Permit Applications supporting the Permit;
- c. Inspection schedules and logs required by 40 CFR § 264.15(b)(2) and § 264.15(d), as applicable;

- d. Personnel training documents and records required by 40 CFR § 264.16 and this Permit, as applicable;
- e. Groundwater sampling and analysis plan for remedial effectiveness and long-term groundwater monitoring required by this Permit, including groundwater monitoring results. and;
- f. Corrective Action work plans, reports, and other information and submissions regarding Corrective Action, as applicable under this Permit.

I.K. APPROVAL/DISAPPROVAL OF SUBMISSIONS

- I.K.1. The VDEQ will review the plans, reports, schedules and other documents (hereinafter collectively referred to as "submissions") submitted which require the Director's approval. All reviews will be within 60 days unless an extension for review is submitted by the VDEQ. The VDEQ will notify the Permittee in writing of the VDEQ's approval, conditional approval, or disapproval of each submission.
- I.K.2. Each submission required by this Permit, upon approval by the Director, is incorporated into this Permit. Any noncompliance with a VDEQ-approved submission shall be deemed as noncompliance with this Permit. A conditionally approved submission, including any terms of such conditional approval set forth in VDEQ's decision, shall constitute the VDEQ-approved submission and shall be incorporated into this Permit.
- I.K.3. In the event of the VDEQ's conditional approval of submission, the Director shall specify in writing any deficiencies in the submission and the terms upon which approval of the submission is conditioned. If the Permittee disputes any term upon which approval of the submission was conditioned, the Permittee may initiate Dispute Resolution pursuant to permit condition I.L.
- I.K.4. In the event of the VDEQ's disapproval of a submission, the Director or the VDEQ shall specify the deficiencies in writing. The Permittee shall address the specified deficiencies within a reasonable time period established by the Director or the VDEQ taking into account the tasks to be performed, and submit the revised submission, as necessary, to the VDEQ for approval.
- I.K.5. If the revised submission is disapproved, the Director or the VDEQ will notify the Permittee of the deficiencies in writing and specify a schedule for the Permittee to correct the deficiencies and resubmit the submission to VDEQ. The Permittee shall correct the deficiencies as directed by VDEQ, and forward the revised submission within the time period specified by VDEQ. In the event the Permittee disagrees with the VDEQ's disapproval of the revised submission, the Permittee shall notify the VDEQ in writing and the disagreement shall be resolved in accordance with the Dispute Resolution provision in permit condition I.L. of this Permit.

I.L. DISPUTE RESOLUTION

- I.L.1. Except as otherwise provided in this Permit, in the event the Permittee disagrees, in whole or in part, with Department disapproval of any submission required by this Permit, the Permittee shall notify the Department in writing of its objections, and the basis thereof, within fourteen (14) days of receipt of the Department's disapproval. Such notice shall set forth the specific matters in dispute, the position(s) the Permittee asserts which should be adopted as consistent with the requirements of the Permit, the basis for the Permittee's position, and supporting documentation considered necessary for the Department's determination.
- I.L.2. The Department and the Permittee shall have an additional fourteen (14) days from the Department's receipt of the notification to meet or confer to resolve any disagreement/dispute. In the event agreement is reached, the Permittee shall submit the revised submission and implement the same in accordance with such agreement.
- I.L.3. In the event the Permittee and the VDEQ are not able to reach an agreement on the dispute items within the additional 14-day period, the Department will notify the Permittee in writing of its decision on the dispute and the Permittee shall comply with the terms and conditions of the Department's decision in the dispute. The Permittee does not waive its right to assert any and all available defenses in a proceeding to enforce this Permit.
- I.L.4. In the event the Permittee disagrees with VDEQ's disapproval of a submission or revised submission and the VDEQ's written decision regarding dispute items, the Permittee may file an appeal with the Director within 30 days of the disapproval (as provided for in Rule 2A:2 of the Supreme Court of Virginia).

I.M. FUNDING

- I.M.1. Nothing in this permit shall require a violation of the Anti-Deficiency Act, 31 U.S.C. 1341. The Permittee agrees to use its best efforts to obtain all necessary funding through the appropriate authorities or source(s) to ensure the compliance with this permit and continued maintenance of all ICs and ECs associated with SWMUs and/or AOCs as identified in the permit, and, where necessary, the timely re-implementation of any ICs or ECs and/or completions of corrective action necessitated by an inappropriate change to a IC or EC.

MODULE II - SITE-WIDE CORRECTIVE ACTION

II.A. CORRECTIVE ACTION FOR CONTINUING RELEASES; PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

- II.A.1. Section 3004(u) of RCRA, 42 U.S.C. § 6924(u), and regulations codified under 40 CFR § 264.101, provide that all permits issued after November 8, 1984, must require corrective action (CA) as necessary to protect human health and the environment for all releases of hazardous waste or hazardous constituents from any solid waste management unit (SWMU), regardless of when waste was placed in the unit.
- II.A.2. Under Section 3004(v) of RCRA, 42 U.S.C. § 6924(v), and 40 CFR § 264.101(c), the Department may require that CA at a permitted facility be taken beyond the facility boundary where necessary to protect human health and the environment, unless the owner or operator of the facility concerned demonstrates to the satisfaction of the Department that, despite the owner or operator's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such action.
- II.A.3. Section 3005(c)(3) of RCRA, 42 U.S.C. § 6925(c)(3), and 40 C.F.R. § 270.32(b) provide that each permit shall contain such terms and conditions as the Department determines necessary to protect human health and the environment.

II.B. CORRECTIVE MEASURES IMPLEMENTATION

II.B.1 Background

The initial requirements for the Corrective Action process were specified in a RCRA Corrective Action Permit issued by EPA to Radford Army Ammunition Plant in 1989 (No. VA1210020730) and reissued by EPA on October 31, 2000. The Corrective Action Permit required RFAAP to complete RCRA Facility Investigations (RFIs), implement interim measures (IMs) as necessary, and complete a Corrective Measures Study (CMS) to address releases for approximately 80 CAUs at the Facility. Work plans and reports submitted by RFAAP to EPA and VDEQ for the activities noted above are located on the RFAAP Installation Restoration Program (IRP) online document repository (<http://www.radfordaapirp.org>).

Subsequent to the activities noted above, EPA prepared two Statement of Basis (SB) documents (May 2011 and June 2014) detailing proposed remedies for CAUs at the Facility.

In April 2012, EPA issued a Final Decision and Response to Comments (FDRTC or Final Decision) for the May 2011 SB prepared for a majority of the Facility's CAUs. The Final Decision document described the information gathered during environmental investigations at the Facility and selected Remedy. The selected remedies included Institutional Controls for ten (10) CAUs. Of these ten (10) CAUs, Engineering Controls were also the selected remedy for three (3) units.

In August 2014, EPA issued a FDRTC or Final Decision for the June 2014 issued SB prepared for four (4) CAUs not included in the May 2011 SB. Selected remedies consisted of Institutional Controls, Engineering Controls, and Monitored Natural Attenuation (MNA) and/or Long-term groundwater monitoring.

Since this issuance of the 2000 CA Permit, the EPA transferred the responsibility for renewal of the Permit to the VDEQ's Office of Waste Permitting and Compliance. VDEQ issued RFAAP the Facility's Corrective Action permit renewal application request on January 13, 2015. This Facility RCRA Corrective Action Permit issued by VDEQ addresses implementation of the selected Remedy for CAUs at the RFAAP as well as ongoing obligations for future environmental compliance and cleanup.

Based on the Final Decision and SB documents, this Corrective Action Permit issued by VDEQ, incorporates CAUs at RFAAP subject to RCRA Corrective Action requirements. Table 1 of Attachment A summarizes the Final Remedy for fourteen (14) corrective action units including: nine solid waste management units (SWMUs), four Site Screening Areas (SSAs), and the Army Reserve Small Arms Range (ARSAR). Also listed on Table 1 is the Former Mortar and Gun Range which is included in this Corrective Action Permit. The Former Mortar and Gun Range is currently under active investigation.

II.B.2. Final Remedy.

- a. Based on the findings of the RFIs, RFAAP conducted a CMS and completed IM. Based on the CMS results, the final remedy for the facility was developed and is described in two Statement of Basis documents, dated May 2011 and June 2014, respectively. The requirements of this Permit provide for the operation and maintenance of the remedies described in the two Statements of Basis.
- b. The goal of the remedy for facility-wide corrective action is to ensure protection of human health and the environment. The final remedy for the facility consists of implementing Institutional Controls, Engineering Controls and Monitored Natural Attenuation in the form of long-term groundwater monitoring. Institutional Controls (ICs) are generally non-engineered mechanisms such as administrative and/or legal controls that minimize the potential for human exposure to contaminants and/or protect the integrity of a

remedy. Engineering Controls (ECs) are generally engineered mechanisms such as a landfill cap.

- c. The remedial goals of the final remedies as discussed below are presented in Attachment C of this Permit.

Final Remedies are shown in Table 1 Attachment A and include:

1. Engineering Controls (ECs) and Institutional Controls (ICs): SWMU 40 and SSAs 30 and 79.
2. ICs: SWMUs 13, 41B, 43, 45, 51; and SSAs 72,77, and Southeast Hillside Area of the Army Reserve Small Arms Range (ARSAR).
3. Monitored Natural Attenuation (MNA) for SWMUs . 49, and 54.
4. Implementation and maintenance ICs and ECs including property use restrictions for groundwater and soil in accordance with Permit Section II.B.3 below.

SWMU and/or AOCs not included in the Final Remedy

As previously noted, the Former Mortar and Gun Range was not included in the approved remedy documents. Investigation of the Former Mortar and Gun Range is on-going.

II.B.3. Final Remedy Implementation

- a. The Permittee shall use existing approved work plans and/or documents for operation and maintenance of long-term groundwater monitoring and reporting; and implementation of ICs, ECs, and additional Groundwater Use Restrictions. Final remedies shown in Table 1 Attachment A are summarized below:
1. Prohibit the use of groundwater beneath SWMUs 40, 48, 49 and 54;
 2. Require inspection and maintenance of landfill caps and/or covers;
 3. Restrict earth moving; and
 4. Restrict subsurface soil excavation below 15 feet at SWMU 51.
- b. The Permittee shall notify the VDEQ in writing of any proposed changes in the use of the property or proposals for any site work that affects the contamination or its disposition on the property.

II.C. EVALUATION OF THE FINAL REMEDY FOR GROUNDWATER MONITORING

The Permittee shall submit a progress report on groundwater monitoring until remedial clean up requirements have been met. See Section I.I.1 for reporting, notifications and submission requirements. If the VDEQ determines that the final corrective measure(s) remedy will not comply with the media clean-up requirements, the Department may require the Permittee to perform additional studies and/or perform modifications to the existing corrective measure(s) remedy. If necessary, the Department or the Permittee may seek modification of this Permit pursuant to 40 C.F.R. § 270.41 or § 270.42 and § 124.5 to implement modifications to the existing corrective measures remedy.

II.D. EMERGENCY RESPONSE; RELEASE REPORTING

II.D.1. Emergencies

If, at any time during the term of this Permit, the Permittee discovers that a release of hazardous waste or hazardous constituents at or from the facility is presenting or may present an imminent and substantial endangerment to human health or the environment, and such release is not subject to a Contingency Plan and Emergency Procedures, as applicable to the facility, and as defined in the portion of the RCRA Permit issued by the Department, the Permittee shall:

- a. Notify the Department as soon as practicable of the source, nature, extent, location, and the amount of such release, the endangerment posed by such release and the actions taken and/or to be taken, to the extent known, to address such release. Such notification shall also be confirmed in writing within three (3) days of discovery of such release.
- b. Unless otherwise directed by the Department, immediately take such actions as are necessary and appropriate to address such release.

II.D.2. Releases

The Permittee shall notify the Department in writing of the nature, source, extent, and location of a release of hazardous waste or hazardous constituents at or from the facility within seven (7) days of discovery of such release which:

- a. Is not being addressed by corrective measures at the time of such discovery.
- b. Is not being addressed pursuant to permit conditions II.D.1., Emergencies.
- c. Is not subject to the Contingency Plan and Emergency Procedures, as applicable, if set forth in the portion of the RCRA Permit issued by the Department.

II.D.3. Based on the information submitted in Permit Condition II.D.2 (Releases), the Department may require the SWMUs to be included in an RCRA Facility Investigation or may require Interim Measures.

II.D.4. Nothing in this Permit shall limit the Department's authority to undertake or require any person to undertake response action or corrective action under any law, including but not limited to, Sections 104 or 106 of CERCLA, 42 U.S.C. §§ 9604 or 9606, and Section 7003 of RCRA, 42 U.S.C. § 6973. Nothing in this Permit shall relieve the Permittee of any obligation it may have under any law, including, but not limited to, Section 103 of CERCLA, to report releases of hazardous waste, hazardous constituents or hazardous substances to, at or from the facility.

II.E. GUIDANCE DOCUMENTS

Any corrective action performed at the facility shall be in general accordance with applicable EPA RCRA corrective action guidance available at: http://www.epa.gov/reg3wcmd/ca/ca_resources.htm.

II.F. SOLID WASTE MANAGEMENT UNIT (SWMU) ASSESSMENT

II.F.1. The Permittee shall notify the Department in writing, of any newly identified SWMU at the facility, no later than thirty (30) days after the date of discovery. The notification shall include, but not be limited to, the following known information:

- a. A description of the SWMUs type, function, dates of operation, location (including a map), design criteria, dimensions, materials of construction, capacity, ancillary systems (e.g., piping), release controls, alterations made to the unit, engineering drawings, and all closure and post-closure information available, particularly whether wastes were left in place.
- b. A description of the composition and quantities of solid wastes processed by the units with emphasis on hazardous wastes and hazardous constituents.
- c. A description of any release (or suspected release) of hazardous waste or hazardous constituents originating from the unit. Include information on the date of release, type of hazardous waste or hazardous constituents, quantity released, nature of the release, extent of release migration, and cause of release (e.g., overflow, broken pipe, tank leak, etc.). Also, provide any available data that quantifies the nature and extent of environmental impact, including the results of soil and/or groundwater sampling and analysis efforts. Likewise, submit any existing monitoring information that indicates releases of hazardous waste or hazardous constituents has not occurred or is not occurring.

d. A discussion of the need for and feasibility of implementing interim measures immediately.

II.F.2. Upon receipt of the notification of any newly identified SWMU, the Department will determine the need for corrective action at such SWMU. If corrective action is necessary to protect human health or the environment, the Department will determine whether a RCRA Facility Investigation will be performed and the need for and scope of any Interim Measures for a newly identified SWMU.

II.F.3. Within 120 days after receipt of the Director's determination that a RCRA Facility Investigation or Interim Measures is necessary and subject to available funding, the Permittee shall submit a RCRA Facility Investigation Work Plan or Interim Measures Work Plan that meets the applicable guidance. The Department's determination shall either specify the media and/or parameters to be investigated or shall require the Permittee to propose and justify the selection of media and/or parameters.

II.F.4. Within the time specified in the approved RCRA Facility Investigation Work Plan or Interim Measures Work Plan and subject to available funding, the Permittee shall submit the RCRA Facility Investigation Report or Interim Measures Report. The reports will provide data necessary for the Department to determine whether a Corrective Measures Study or additional Interim Measures Work Plan is required.

II.F.5. In lieu of a separate RCRA Facility Investigation and subject to available funding, the Permittee may propose to incorporate any newly identified SWMU into the ongoing corrective measures. Any such proposal shall be submitted to the Department along with notification of the discovery of the SWMU(s).

II.G. FINANCIAL ASSURANCE

II.G.1. The VDEQ recognizes that the federal government is self-insured and is exempt from this requirement.

II.H. RECORDKEEPING

Upon completion of closure of any SWMU, the Permittee shall maintain in the facility operating record, documentation of the closure measures taken.

II.I. ACCESS FOR CORRECTIVE ACTION OVERSIGHT

The Department and its authorized representatives shall have access to the facility at all reasonable times for the purpose of monitoring compliance with the provisions of this Permit. The Permittee shall use its best efforts to obtain access to property beyond the boundaries of the facility at which corrective action is required by this Permit (see Section 3004(v) of RCRA, 42 U.S.C. § 6924(v) and 40 CFR § 264.101(c)) for: (1) the Permittee and any contractor of the Permittee for the

purpose of taking corrective action required by this Permit, and (2) the Department and its authorized representatives for the purposes described in this paragraph.

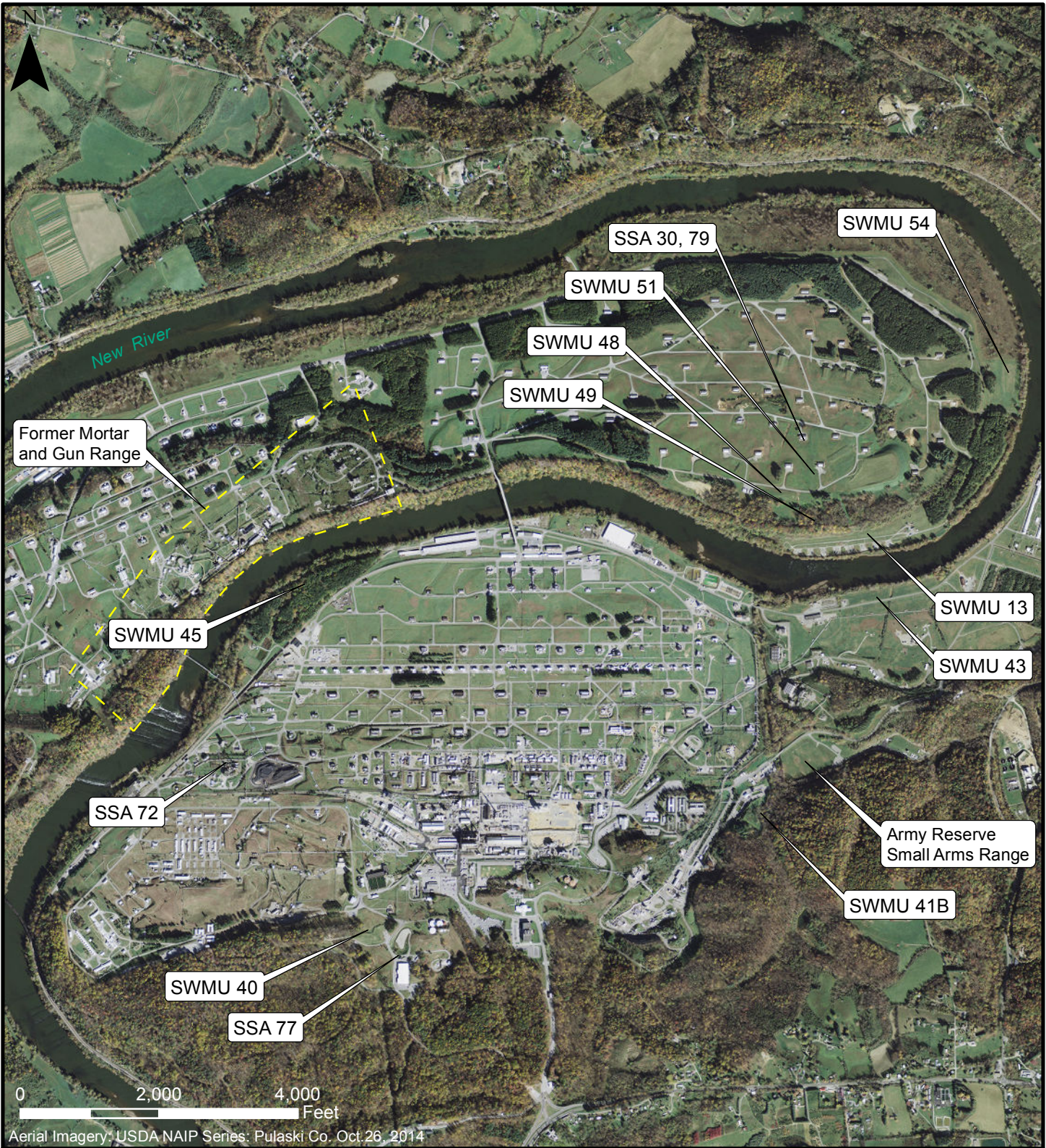
II.J. COMPLETION OF REMEDY

The interim measures/remedy program consisting of monitored natural attenuation in the form of groundwater monitoring shall continue until remedial objectives are met as referenced in the approved work plan for the unit. The remedial groundwater cleanup goals and the exit strategy detailing the requirements to terminate interim measures are presented in Attachment C.

If any of the institutional or engineering controls are no longer necessary to protect human health and the environment, the Permittee shall submit a written notification and certification to the Department by registered mail, stating that the remedy has been completed in accordance with requirements of this Permit and requesting removal of the controls from the Permit. The certification must be signed by the Permittee and by an independent registered professional engineer.

In cases where no other Permit conditions remain, the Permit may be modified not only to reflect the determination that remedy controls are no longer necessary, but also to change the expiration date of the Permit to allow for earlier permit expiration in accordance with 40 CFR § 124, § 270.41, and § 270.42 as applicable.

ATTACHMENT A
FACILITY MAP OF RCRA CORRECTIVE ACTION UNITS –
FIGURE 1
and
SUMMARY OF CORRECTIVE ACTION UNITS FINAL
REMEDIES – TABLE 1



Path: P:\B03200\B03204\B03204-139\GIS\Fig-1 RCRA Corrective Action Units.mxd

RCRA Corrective Action Units

Radford Army Ammunition Plant
Radford, Virginia

SCALE: 1" =2000'

PLAN NO. B03204-139



Draper Aden Associates

Engineering • Surveying • Environmental Services

2206 South Main Street
Blacksburg, VA 24060
540-552-0444 Fax: 540-552-0291

Richmond, VA
Charlottesville, VA
Hampton Roads, VA
Coats, NC

DESIGNED
DRAWN
CHECKED
DATE

MJN
SMF
MJN
3-19-15

FIGURE

1

Table 1 – Corrective Action Units Final Remedies

Location	Description	Institutional Controls	Engineering Controls
SWMU 13	Area Between the Open Burning Ground and the New River	Restriction on earth moving, residential use	
SWMU 40	Landfill Nitro Area	Restriction on earth moving, residential use, and groundwater use	Maintain Cover
SWMU 41 B	Red Water Ash Burial Ground	Restriction on earth moving, residential use	
SWMU 43	Sanitary Landfill #2	Restriction on earth moving, residential use	
SWMU 45	Landfill #3	Restriction on earth moving, residential use	
SWMU 48	Oily Water Burial Area	Restriction on groundwater use	
SWMU 49	Red Water Ash Burial #2	Restriction on groundwater use; MNA	
SWMU 51	TNT Waste Neutralization Pits	Restriction on earth moving below 15 feet, residential use	
SWMU 54	Propellant Burning Ash Burial	Restriction on groundwater use; MNA	
SSA 30	Asbestos Disposal Trench #1	Restriction on earth moving, residential use	Maintain Cover
SSA 72	Oleum Plant Acidic Wastewater Sump	Restriction on earth moving, residential use	
SSA 77	Garbage Incinerator	Restriction on earth moving, residential use	
SSA 79	Asbestos Disposal Trench #2	Restriction on earth moving, residential use	Maintain Cover
Army Reserve Small Arms Range (ARSAR)	Southeast Hillside Area of ARSAR	Restriction on residential use	
Former Mortar and Gun Range	Currently under active investigation		

ATTACHMENT B

**FACILITY BACKGROUND, CORRECTIVE
ACTION UNIT DESCRIPTIONS AND
ENVIRONMENTAL HISTORY**

ATTACHMENT B

FACILITY BACKGROUND, CORRECTIVE ACTION UNIT DESCRIPTIONS AND ENVIRONMENTAL HISTORY

FACILITY BACKGROUND

The Radford Army Ammunition Plant (RFAAP) facility is located in the mountains of southwest Virginia in Pulaski and Montgomery Counties and consists of two noncontiguous areas: the Main Manufacturing Area (MMA) and the New River Unit (NRU). The MMA is located approximately five miles northeast of the City of Radford, Virginia, and ten miles west of the Town of Blacksburg, Virginia. The NRU is located approximately six miles west of the MMA and is not the subject of this Corrective Action Permit. SWMUs or areas described in this Corrective Action Permit are located in the MMA and referred to as the RFAAP or the facility.

RFAAP lies in one of a series of narrow valleys typical of the western range of the Appalachian Mountains. Oriented in northeast/southwest direction, the valley is approximately 25 miles long, eight miles wide at the southeast end and narrowing to two miles wide at the northeast end. RFAAP lies along the New River in the relatively narrow northeastern corner of the valley. The New River divides the RFAAP into two areas, the Horseshoe Area (HSA) and the MMA. The HSA (which is part of the MMA) lies within a meander of the New River.

RFAAP is an active manufacturer of explosives and propellants for the US military and other uses. RFAAP began manufacturing propellants in the 1940s and, as noted above, continues that work today. RFAAP has also produced TNT on an intermittent basis. RFAAP was first issued a RCRA Corrective Action Permit by the U.S. EPA in 1989. The permit was reissued in October 2000. Pursuant to the 2000 permit, approximately 80 CAUs were identified for investigation and potential remediation.

A Final Decision and Response to Comments (FDRTC) was issued by the EPA in April 2012 for a majority of the CAUs. The FDRTC references a Statement of Basis (SB) from May 2011 that identifies the remedies to individual CAUs at the facility (SWMUs, AOCs, SSAs, and MUs). Remedies included No Further Action (NFA), Engineering Controls for (ECs), Institutional Controls (ICs), and Monitored Natural Attenuation (MNA) and/or long-term groundwater monitoring. The EPA and VDEQ issued final remedies for four CAUs in an August 2014 FDRTC associated with a SB issued in June 2014. This Corrective Action permit, issued by VDEQ, addresses implementation of the selected Final Remedy for applicable CAUs. Table 1 indicates CAUs which will be addressed by remedies other than No Further Action. Table 1 also includes the Former Mortar and Gun Range which is currently under active investigation.

DESCRIPTION OF SWMUs, SSAs, and MUs

The following information summarizes the SWMUs, SSAs and MUs noted above, the environmental history, and final Remedy for Corrective Action. The information was obtained from the applicable SB.

SWMU 13

SWMU 13 is the area outside the Open Burning Ground (OBG) (see Figure 1, Attachment A). It consists of a 1.6-acre area between the OBG and the north bank of the New River in the western section of the Horseshoe Area. The unit is located topographically downhill from the OBG and likely received drainage from the OBG prior to the reconfiguration of the OBG to prevent storm water runoff from the unit. Open burning of waste and off-specification energetic products has been performed continuously at the OBG since manufacturing operation began at RFAAP in 1941. Open detonation has not been conducted. A RCRA Subpart X Permit (VA1210020730) was issued by the VDEQ in October 2005 for open burning at the OBG.

Environmental History

- 1987: OBG is visually investigated and found to have remnants of incompletely combusted propellant. Area of concern includes SWMU 13.
- 1992: Historical and present-day aerial photographs of the area outside the OBG (SWMU 13) are analyzed. Reports indicate the area is undeveloped and vegetated during the study period.
- 1997: Sediment samples collected adjacent to and downstream of SWMU 13 indicate the presence of metals and semivolatile organic compounds (SVOCs). Surface water samples collected adjacent to SWMU 13 indicate the presence of lead and barium below residential risk screening levels.
- 2005 – 2008: Soil samples collected from SWMU 13 indicate concentrations of metals exceed residential risk screening levels. Groundwater samples collected from the northern boundary of SWMU 13 indicate carbon tetrachloride and perchlorate concentrations exceed the groundwater protection standards set forth in VDEQ's Subpart X Permit.
- 2007: Site Screening Process (SSP) Investigation that includes advancement of five soil borings and collection of two surface water and sediment samples from the New River adjacent to SWMU 13 identifies lead as a primary constituent of concern. SSP report recommends a focused RFI for soils and sediment associated with SWMU 13.
- 2008: Sediment sampling adjacent to SWMU 13 indicates lead and explosive concentrations are below human health residential screening levels.
- 2010: RFI Report recommending institutional controls to prevent earth moving and residential use as the final remedy for SWMU 13 is approved by EPA.

Final Remedy for Corrective Action

EPA selects Institutional Controls as Final Remedy for SWMU 13. The ICs are a restriction on earth moving within SWMU 13 and that future use of the area comprising by SWMU 13 shall not be residential.

SWMU 40

SWMU 40 is the Landfill Nitro Area located within the south-central portion of the MMA (see Figure 1, Attachment A). SWMU 40 is a 2-acre undeveloped, open grass-covered area, with the exception of a gravel covered area used for temporary storage of asbestos located at the eastern edge of the unit. SWMU 40 was used in the 1970s and early 1980s for the burial of paper, office trash, concrete, and rubber tires. The unit was not permitted as a solid waste landfill by the Commonwealth of Virginia. Operation ceased and the unit was closed with a clay cap and grass cover.

Environmental History

- 1987: Unit is assessed by review and evaluation of available information, personnel interviews, and visual inspection.
- 1992: Historical aerial photographs of SWMU 40 are analyzed. Activity is first observed in a 1971 photograph showing significant filling with three fill faces in the SWMU area. The 1986 photograph indicates much of the unit has been revegetated except for the northeast corner where evidence of recent filling is apparent.

Analytical results of surface soil and composite samples collected as part of RFI from SWMU 40 indicate petroleum hydrocarbons were detected at concentrations below the VDEQ action level.

- 2009: Risk assessment of SWMU 40 indicated elevated risk associated with aluminum in soils if the land changed to residential or if the impacted soil material was not left place. Corrective measures were developed based on the following:
 - Current land use of the unit is undeveloped industrial consisting of a 2-acre closed landfill; and,
 - Land use of the unit is unlikely to change in the future due to the presence of closed landfill contained by a surface cap and cover.
- 2011: Interim Measures Work Plan. SWMU 40 Interim Measures Work Plan *SWMU 40 (RAAP-009) Landfill Nitro Area Interim Measures Work Plan Radford Army Ammunition Plant, Radford, VA. Final. August 2011* approved by EPA and VDEQ. This work plan provided the technical approach, data screening, evaluation and assessment criteria and exit strategy for the groundwater monitoring effort. Frequency of groundwater monitoring would vary, Year 1 frequency would be quarterly, Years 2 to 5 would at a 9 month frequency and Years 6 to 30 (if required) would be at an annual frequency.

- 2012: SWMU 40 Interim Measures Completion Report (IMCR) Work Plan details include mobilization, installation of monitoring well, repairs to landfill cap, and implementation of institutional controls (ICs).
- 2013: Long-Term Monitoring Report *SWMU 40 (RAAP-009) Landfill Nitro Area Annual Long Term Monitoring Report. Radford Army Ammunition Plant, Radford, VA. Draft Final. April 2013* approved by EPA and VDEQ. For this Year 1 report monitoring was conducted quarterly and recommended reductions in the long-term monitoring.
- 2013: Long-Term Monitoring Report *SWMU 40 (RAAP-009) Landfill Nitro Area Annual Long Term Monitoring Report. Radford Army Ammunition Plant, Radford, VA. Draft. October 2013* approved by EPA and VDEQ. For this Year 2 report, monitoring was conducted on a 9 month frequency and recommended reductions in the long-term monitoring.
- 2014: Long-Term Monitoring Report *SWMU 40 (RAAP-009) Landfill Nitro Area Year 3 Long Term Monitoring Report. Radford Army Ammunition Plant, Radford, VA. Draft Final. July 2014* approved by EPA and VDEQ. For this Year 3 report, monitoring was conducted on a 9-month frequency and recommended reduction in the long-term monitoring.
- 2015: Long-Term Monitoring Report *SWMU 40 (RAAP-009) Landfill Nitro Area Year 4 Long Term Monitoring Report. Radford Army Ammunition Plant, Radford, VA. Draft Final. March, 2015* approved by EPA and VDEQ. For this Year 4 report monitoring was conducted on a 9 month frequency and recommended to discontinue the long-term monitoring.
- 2015: Remedy Review Report *SWMU 40 (RAAP-009) Landfill Nitro Area Remedy Review Report. Radford Army Ammunition Plant, Radford, VA. Draft Final. May, 2015* approved by EPA and VDEQ. This remedy review report summarized the actions taken in accordance with the 2012 SWMU 40 IMCR Work Plan and subsequent long term monitoring reports and recommended to maintain the cover and inspections and to discontinue the long term monitoring.

Final Remedy for Corrective Action

EPA selects Engineering Controls (ECs), Institutional Controls (ICs) and Long-Term Monitoring (LTM) as Final Remedy for SWMU 40. The ECs include repairs to the existing landfill cap, long-term inspection and maintenance of the cap, and clear marking of the capped area. ICs include prevention of residential use, prevention of earth-moving, and a restriction on potable use of groundwater.

SWMU 41B

SWMU 41 is located in the southeastern portion of the RFAAP Main Manufacturing Area (see Figure 1, Attachment A). The unit consists of two non-contiguous disposal areas (SWMU 41A and SWMU 41B) for red water ash. Red water ash is a byproduct of combustion of TNT production wastewater. SWMU 41B is a 0.36-acre natural clay-lined landfill containing red water ash. From approximately 1967 to 1974 and again from 1983 to 1986,

RFAAP manufactured TNT by the continuous-type process, which employed chemical recycling and resulted in a smaller quantity of more concentrated waste than older batch-type operations. In TNT manufacture, red colored wastewater, known as red water, is produced. Red water generated from continuous-type process TNT manufacturing was concentrated by evaporation and the residue burned in rotary kilns located in the former TNT manufacturing area. The ash produced from these kilns was disposed of in SWMU 41B from 1967 to 1971. Disposal ceased in 1971 and SWMU 41B was deactivated.

Environmental History

- 1987: Unit is assessed by review and evaluation of available information, personnel interviews, and visual inspection. None of the data collected indicates releases have occurred.
- 1992: Historical aerial photographs of SWMU 41B are analyzed. SWMU 41B is noted as having received considerable amounts of fill material between 1981 and 1986. Area is devoid of vegetation in 1986.
1992: Verification investigation performed includes soil, surface water, and groundwater sampling. Soils results indicate metals exceeded residential risk screening levels but were below RFAAP facility-wide background point estimates. Groundwater results indicate SVOCs and metals concentrations exceeded risk screening levels. Detected constituents in surface water were below applicable screening levels.
- 2002: Geophysical survey conducted to delineate potential red water ash burial locations within the unit. Buried material was estimated to be ten feet below ground surface.
- 2005: RFI identifies metals as constituents of potential concern (COPC) in soil and groundwater (SWMU 41B).
- 2010: Groundwater sample results indicate there is no unacceptable risk to human health or the environment.
- 2011: EPA approves final RFI. Final Remedy is proposed as detailed below.

Selected Remedy for Corrective Action

EPA selects Institutional Controls (ICs) as Final Remedy for SWMU 41 B. ICs include prevention of residential use and prevention of earth-moving.

SWMU 43

SWMU 43 is a closed unlined sanitary landfill located immediately adjacent to the New River in the northeast section of the MMA (see Figure 1, Attachment A). SWMU 43 consists of two adjacent approximately 1.5-acre cells divided by a central drainage ditch. Based on geophysics and aerial photography, the landfill extends east-west approximately 700 feet on either side of the drainage ditch. The north and south boundaries are the river bank and the paved road, respectively. The landfill has a north-south dimension of approximately 150 feet.

The former trench-fill operation reportedly received at least 300 tons of paper and refuse over its active life. The landfill was reportedly operated from 1958 to the early 1970s.

Environmental History

- 1987: Unit is assessed by review and evaluation of available information, personnel interviews, and visual inspection. No known releases are documented for this unit.
- 1992: Investigation of surface and groundwater is performed. Metals are detected in surface water above EPA MCLs for drinking water. VOCs and metals are detected in groundwater above EPA risk screening levels and MCLs, respectively.
- 2007: Geophysical survey performed to identify landfill cell boundaries. No anomalies or debris detected. Thirty soil samples are collected. Residential screening level exceedances include one PAH, two PCBs, one explosive, two metals, and four dioxin/furans. One VOC and five metal detected above groundwater RSLs.
- 2010: Results of risk assessment performed to evaluate potential human and ecological receptors and exposure pathways indicated no unacceptable risks were identified for industrial and construction workers under current land use conditions. Groundwater sampling results from October 2010 indicated VOCs were within (or below) the range of previous data.
- 2011: Final SWMU 43 RFI report concludes the risk to industrial workers is within the acceptable range and the site and recommends controls at the site prevent residential use.

Final Remedy for Corrective Action

EPA selects Institutional Controls (ICs) to prevent residential use and earth moving as Final Remedy for SWMU 43.

SWMU 45 Landfill #3

SWMU 45, the Inactive Sanitary Landfill (a.k.a., Landfill #3), consists of a 3.4-acre area in the northwest section of the Main Manufacturing Area (see Figure 1, Attachment A). The New River is approximately 200 feet north-northwest of the unit. Historical records indicate the landfill was in operation from 1957 to 1961. Previous investigations determined that a variety of waste, including scrap metal, may have been disposed of in the landfill.

Environmental History

- 1987: Unit is assessed by review and evaluation of available information, personnel interviews, and visual inspection. Reportedly, the area identified by site personnel as the landfill was “indistinguishable from the surrounding area as a landfill site.” Reportedly, the disposal unit began operation in the 1970s but was not active at the time of visual inspection in 1986.

- 1992: Investigation of groundwater indicates VOCs and metals were detected above EPA Regional Screening Levels (RSLs). Analysis of historical aerial photography indicated:
 - 1949: substantial clearing and possible fill activity in SWMU 45 area
 - 1954: unit appeared to have been enlarged with access roads and open containers visible; however most of unit appears to be vegetated
 - 1962 and 1966: most of unit vegetated; possible trench and dark-toned material are visible
 - 1971 and 1975: most of unit vegetated except for small ground scarred area
- 2007: Geophysical survey performed to confirm monitoring wells appropriately placed to detect deep releases to groundwater. Areas of metal debris were identified within the boundary of SWMU 45.
- 2010: Site Screening Process (SSP) investigation report concludes unit-related cancer risks are within EPA target ranges for Superfund Sites and ecological risks are negligible.

Final Remedy for Corrective Action

EPA selects Institutional Controls (ICs) to prevent earth moving as Final Remedy for SWMU 45. Table 2 of the FDRTC indicates a restriction on residential use as part of the Final Remedy for SWMU 45.

SWMUs 48 and 49

SWMUs 48 and 49 are combined into one study area which is located in the southeastern portion of the HSA, east of the main bridge over the New River (see Figure 1, Attachment A). The two SWMUs are adjacent, with SWMU 48 located approximately 200 ft northwest of SWMU 49. SWMU 48 is approximately 380 ft long by 120 ft wide; whereas, SWMU 49 is 75 ft long by 83 ft wide. The SWMUs are situated on a bluff approximately 120 ft above the New River. SWMU 48 is known as the Oily Water Burial Area and SWMU 49 is known as the Red Water Ash Burial No. 2; however, SWMUs 48 and 49 are combined into one study area because in previous reports their descriptive titles have been used interchangeably and because of their close proximity to each other. SWMUs 48 and 49 share unlined trenches where oily wastewater and red water ash were disposed starting around 1970.

Environmental History

- 1987: Unit is assessed by review and evaluation of available information, personnel interviews, and visual inspection. The results conclude SWMUs 48 and 49 are contiguous.
- 1992: Verification investigation to characterize nature and extent of impact concludes explosive SVOC compounds were detected at SWMU 48 above health-based risk levels.

- 1996-2006: Several investigations performed the results of which provided a comprehensive data set to assess concentrations of constituents of concern over time.
- 2007: RFI - Soil at SWMU 48 considered adequately characterized; however, additional soil sampling is conducted at SWMU 49. Four additional monitoring wells are installed and sampled along with existing monitoring wells.
- 2010: Test pits advanced perpendicular to trenches at SWMU 48 where a clayey substance containing high concentrations of metals is discovered.
- 2011: IM performed to remove impacted soil, the ash layer, debris, and clayey substance from southern trench of SWMU 48. Material is disposed of off-site.
 - A total of 3,393 tons of nonhazardous soil and 101.6 tons of hazardous soil were removed from SWMU 48. The area is backfilled with 3,261 cubic yards of general fill and topsoil and hydrosseeded to finalize site restoration. No further action is necessary for SWMU 48 soils.
- 2013: Supplemental groundwater sampling, including the installation of four additional monitoring wells, is conducted to delineate the extent of chlorinated solvents in the vicinity of SWMUs 48 and 49. Groundwater exceeded MCLs for carbon tetrachloride and TCE.
- 2013: Human health risk assessment (HHRA) determines SWMU 48 cleanup effort achieves residential soil risk guidelines and is now suitable for unrestricted use. The HHRA for SWMU 49 indicates total cancer risk is below or within target risk range and is determined suitable for unrestricted use.
- 2014: *SWMU 49 Monitored Natural Attenuation Groundwater Work Plan Radford Army Ammunition Plant, Virginia. Draft Final Document October 2014* approved by EPA and VDEQ. This work plan provided the technical approach, remedial goals and exit strategy for the groundwater monitored natural attenuation effort.

Final Remedy for Corrective Action

- EPA concludes that, based on available information, there are no unacceptable risks associated with SWMU 48 and 49 soils and are therefore subject to unrestricted use.
- EPA selects monitored natural attenuation as a selected remedy for groundwater until the remedial goals are met (SWMU 49).
- EPA selects ICs in the form of a Groundwater Use Restriction as a selected remedy for SWMU 48 and 49 that indicate groundwater at SWMU 48 and 49 shall not be used for any purpose, including, but not limited to, use as a potable water source, other than to conduct maintenance and monitoring activities required by VDEQ and/or EPA.

SWMU 51 TNT Waste Neutralization Pits

SWMU 51, the TNT Waste Neutralization Pits, consists of one trench, approximately 140 feet long, 23 feet wide, and 14 feet deep, located in the HSA (see Figure 1, Attachment A). The trench has been filled to natural grade with soil and is covered by grass and weeds. A barbed wire fence surrounds SWMU 51.

During the production of TNT, an alkaline, red-colored aqueous waste is generated (red water). Reportedly, this waste stream is composed of TNT purification by-products, air pollution scrubber water, washwater from cleaning of production equipment and facilities and washwater from product washdown operations.

Environmental History

- 1987: Unit is assessed by review and evaluation of available information, personnel interviews, and visual inspection. The assessment concluded that low concentrations of TNT constituents detected in groundwater monitoring wells were indicators of SWMU 51 disposal activities.
- 1992: Historical aerial photographs of SWMU 51 are analyzed and activity is first noted in 1975 based on the presence of a trench that appeared empty. By 1981 the trench had been filled and a revegetated ground scar was the sole feature that remained.

1992: Groundwater sample analyses indicate volatile organic compounds (VOCs), SVOCs, explosives and metals were detected at concentrations above risk-based groundwater screening levels.
- 2002: Results of geophysical survey to delineate extent of TNT neutralization sludge disposal trench indicate the area of the waste is approximately 2,300 square feet and the average thickness is 11 feet.
- 2008: The findings documented in the 2008 RFI report concluded impact to soil existed at SWMU 51 and recommended interim measures in the form of soil removal and disposal to mitigate the threat of release, migration, and/or exposure to the public and environment.
- 2010: Approximately 1,245 cubic yards, or 1,867 tons of impacted soil is removed from SWMU 51. The site is backfilled and seeded to complete restoration.

Final Remedy for Corrective Action

EPA selects Institutional Controls (ICs) to prevent future residential use and earth moving below 15 feet below ground surface as the Final Remedy.

SWMU 54

SWMU 54 is located within the easternmost portion of the HSA (see Figure 1, Attachment A). SWMU 54 consists of two non-contiguous disposal areas; Area A is an approximate 0.58-acre triangular shaped area in the southern portion of SWMU 54 and Area B is an approximate

1 - acre area in the northern portion of SWMU 54. SWMU 54 is currently undeveloped. The RFAAP installation security fence is located along the northern and eastern boundaries of SWMU 54. SWMU 54 was reportedly used as a disposal area in the late 1970s for ash from propellant burning activities located at the Waste Propellant Burning Grounds. The propellant ash consisted of a residue resulting from the burning of waste explosives, propellants, and laboratory waste.

Environmental History

- 1987: Unit is assessed by review and evaluation of available information, personnel interviews, and visual inspection.
- 1992: Verification investigation identifies the ash disposal at Area A.
- 1996: Extent of ash and limits of soil impact are defined as part of RFI.
- 1998: Supplemental RFI and CMS conducted to investigate Area B.
- 2008: RFI/CMS conducted to confirm effectiveness of hotspot removal and assess conditions. Risk assessment concluded unacceptable risks to potential future residential and industrial receptors. Corrective measures including soil excavation/off-site disposal and MNA were recommended.
- 2010: *SWMU 54 Interim Measures Work Plan Radford Army Ammunition Plant, Radford, Virginia. Final Document January 2010* approved by EPA and VDEQ. This work plan provided the technical approach for the soil removal effort.
- 2010/2011: Approximately 870 tons of hazardous soil and 4,921 tons of nonhazardous soil were removed from Area A and 2,200 tons of hazardous soil and 2,288 tons of nonhazardous soil are removed from Area B. The areas are backfilled and seeded to complete restoration. This is documented in the *SWMU 54 (RAAP-014) Interim Measures Completion Report Radford Army Ammunition Plant, Radford, Virginia. Draft Document April 2010* and was approved by EPA and VDEQ.
- 2011: *SWMU 54 (RAAP-014) Monitored Natural Attenuation Interim Measures Work Plan Radford Army Ammunition Plant, Virginia. Final Document April 2011* approved by EPA and VDEQ. This work plan provided the technical approach, remedial goals and exit strategy for the groundwater monitored natural attenuation effort.
- 2012/2013: *SWMU 54 Monitored Natural Attenuation Sampling Year One Report Radford Army Ammunition Plant, Radford, Virginia. Draft Document February 2013* approved by EPA and VDEQ. For this Year 1 report monitoring was conducted quarterly and recommended reductions in the long-term monitoring.
- 2013: *SWMU 54 Monitored Natural Attenuation Sampling Year Two Report Radford Army Ammunition Plant, Radford, Virginia. Draft Document December 2013* approved by EPA and VDEQ. For this Year 2 report monitoring was conducted quarterly and recommended adjustments and reductions in the long-term monitoring. Based on the rapidly decreasing concentrations of COPCs in groundwater, it was determined that active remediation was unnecessary.

- 2014: SWMU 54 Monitored Natural Attenuation Sampling Year Three Report Radford Army Ammunition Plant, Radford, Virginia. Draft Document October 2014 (approved by EPA and VDEQ). For this Year 3 report monitoring was conducted quarterly. Based on the rapidly decreasing concentrations of COPCs in groundwater, it was determined that active remediation was unnecessary.

Final Remedy for Corrective Action

- EPA concludes that, based on available information, there are no unacceptable risks associated with SWMU 54 soils and they are therefore subject to unrestricted use.
- EPA selects MNA as a selected remedy for groundwater until the remedial goals are met.
- EPA selects Groundwater Use Restrictions as the selected remedy for SWMU 54 that indicate groundwater at SWMU 54 shall not be used for any purpose, including, but not limited to, use as a potable water source, other than to conduct maintenance and monitoring activities required by VDEQ and/or EPA.

SITE SCREENING AREAS 30, 72, 77 and 79

Site Screening Area (SSA) 30, Asbestos Disposal Trench No. 1, and SSA 79, Asbestos Disposal Trench No. 2, are co-located in the HSA. SSA 72, the Oleum Plant Acidic Wastewater Sump, are located in the Oleum Plant area of RFAAP. SSA 77, the Garbage Incinerator (Building 7219), is located adjacent to shipping and receiving in the MMA (see Figure 1, Attachment A).

- SSAs 30 and 79 were used for disposal of asbestos containing material from 1982 to 1987. The units received 250 to 500 pounds of double bagged asbestos containing material per day when asbestos removal activities were ongoing at RFAAP.
- SSA 72 operated from 1976 until 1987, when the Oleum Plant was rendered inactive due to TNT manufacturing processes ceasing at RFAAP in 1986.
- SSA 77 operated as a garbage incinerator from the 1940s until 1974, when it was shutdown, rendered inactive, and equipment was removed. The unit was reconstructed and improved in 1953, and garbage incineration operations were reactivated. Incineration operations ceased at the reconstructed unit in 1974. SSA 77 is inactive with no plans to reactivate.

Environmental History

- 1987: Areas are assessed by review and evaluation of available information, personnel interviews, and visual inspection. The assessment indicated the closure status of SSA 30 was uncertain due to the active status of SSA 79. The assessment did not identify historical releases for SSA 77 and indicated that no visible signs of releases were observed during the site inspection of SSA 72. The assessment noted no data indicating releases at SSAs 30 and 79 had been collected.

- 1992: During work conducted as part of SWMU 51 groundwater assessment, groundwater samples collected from periphery of SSA 30 and 79 indicated one SVOC and one explosive were detected at concentrations above applicable screening levels.
- 1996: Groundwater samples collected from periphery of SSA 77 indicated one dissolved metal was detected at a concentration above its MCL.
- 2004: Site Screening Investigation conducted that included collection of two soil samples and one water sample from the acidic wastewater sump at SSA 72. VOCs, poly-aromatic hydrocarbons (PAHs), and metals were detected above RSLs; however, only PAHs were detected above applicable screening levels. Perchlorate, the only analyte, was not detected in the water sample.
- 2006: Sampling conducted as part of the eastern HSA groundwater sampling event. Groundwater samples collected from vicinity of SSA 30 and 79. Analytical results indicate the detections of VOCs, pesticides, and metals were below MCLs.
- 2007: Environmental Baseline Study conducted at SSA 18 and 72. VOCs, polychlorinated biphenyls (PCBs), pesticides and metals were detected in soil samples collected near SSA 18; however, these detections are below applicable screening levels and/or background soil concentrations. The groundwater samples collected from SSA 18 contained concentrations of chloroform and perchlorate above screening levels. Metals and two pesticides were detected at concentrations above applicable screening levels in the water sample collected at the acidic wastewater sump at SSA 72.
- 2010: Site Screening Process (SSP) report concludes unit-related cancer risks at SSA 72 and 77 are within EPA target ranges, exceeding residential standards, but below industrial standards. Unit-related cancer risks at SSA 30 and 79 were below SSP thresholds. Ecological risks are considered negligible at SSAs 30, 72, 77, and 79.

Final Remedy for Corrective Action

SSAs 72 and 77 - EPA selects ICs to prevent future residential use and earth moving.

SSAs 30 and 79 - EPA selects ICs and ECs to maintain unit as closed solid waste management unit due to presence of bagged asbestos containing material within the trenches. ECs will include a clear marking of the area and maintenance of soil cover to prevent erosion and potential exposure to asbestos. ICs will prevent future residential use and earth moving as Final Remedy.

Army Reserved Small Arms Range (ARSAR)

The ARSAR is a munitions response site investigated under the Military Munitions Response Program (see Figure 1, Attachment A). The ARSAR is an approximately 7.6-acre area located along the southeastern boundary of the MMA. Most of the unit is a grass field with wooded areas located along the banks of Stroubles Creek, which is located along the southern portion of the unit. The ARSAR is divided into two areas consisting of the Firing Point/Berm Area and the Southeast Hillside Area. A target berm, which is approximately eight feet high and 270 feet long, is located along the southeastern portion of the Firing Point/Berm Area. The

Southeast Hillside Area is a steep, rocky hillside thought to have been used as a backstop prior to the construction of the target berm. A fence is located at the top of the Southeast Hillside Area, which prevents access to the area. The ARSAR was used as a .30-caliber small arms firing range from approximately 1941 to 1968. The former range is now a grass field surrounded by a fence that is occasionally used as a helicopter landing pad and as a baseball field.

Environmental History

- 2008: Unit is assessed by review and evaluation of available information, personnel interviews, historical records, aerial photography, and environmental restoration documents. The review findings indicate the presence of lead in the target berm and the potential presence of explosives residues at firing points.

2008: Soils collected as part of the SSP indicated elevated antimony and lead concentrations in the target berm and elevated arsenic levels in the Southeast Hillside Area. Munitions and Explosives of Concern (MEC) were not identified. Further action was recommended.

- 2011: RFI performed to characterize soil impact and IM performed to remove soil impact in the SSP. Approximately 1-2 feet of soil was excavated from firing berm face and transported off-site for disposal. Approximately 147 tons, or 105 cubic yards, were removed from the firing range berm.
- 2011: Samples collected from the Firing Point/Berm Area during the 2011 RFI/IM indicated that lead and antimony were not detected in soil, surface water, sediment, or groundwater at concentrations exceeding applicable SLs/RGs. Soils at Firing Point/Berm Area are, therefore, subject to unrestricted use.

Final Remedy for Corrective Action

Due to the presence of elevated concentrations of lead in soils, EPA selected the implementation and maintenance of land use restrictions within the boundary of the Southeast Hillside Area of the ARSAR to prevent any residential use of the area.

Former Gun and Mortar Range

The Former Gun and Trench Mortar Area (a.k.a., Former Gun and Mortar Range) consists of two adjacent areas located within the HSA (See Figure 1, Attachment A). The area is located within the current Nitroglycerin 2 (still active) manufacture area and within the Continuous Automated Multi-Base Line (CAMBL) area (inactive). The Gun Range Area occupies approximately 26 acres and the Trench Mortar Range occupies approximately 87 acres. The Former Gun and Mortar Range is presently regulated under the Military Munitions Response Program (MMRP) which generally follows CERCLA. RCRA is the primary driver for addressing impacts to the Former Gun and Mortar Range; however, RCRA does not provide special provisions for dealing with explosive safety. Investigation of the Former Gun and Mortar Range is on-going.

ATTACHMENT C
REMEDIAL GOALS AND EXIT STRATEGY

ATTACHMENT C REMEDIAL GOALS FOR GROUNDWATER

Remedial Goals for Groundwater

Constituent of Concern (COC)	Selected Remedial Goals (RGs) for Groundwater (µg/L)
<i>SWMU 49</i>	
Carbon tetrachloride	5.0 ⁽¹⁾
Trichloroethene	5.0 ⁽¹⁾
<i>SWMU 54</i>	
2,4,6-Trinitrotoluene (2,4,6-TNT)	7.82 ⁽²⁾
DNT Mixture	0.932 ⁽²⁾
RDX	6.1 ⁽²⁾
Perchlorate	10.9 ⁽²⁾

Notes:

DNT = Dinitrotoluene
RDX = Hexahydro-1,3,5-trinitro-1,3,5-triazacyclohexane
µg/L = micrograms per liter

- (1) = Remedial goals for SWMU 49 documented in Table 1-5 *SWMU 49 Monitored Natural Attenuation Groundwater Monitoring Work Plan, Radford Army Ammunition Plant, Radford, VA. Draft Final. October, 2014.*
- (2) = Remedial goals for SWMU 54 documented in Table 1-7 *SWMU 54 (RAAP-14) Monitored Natural Attenuation Interim Measures Work Plan, Radford Army Ammunition Plant, Radford, VA. Final. April, 2011.*

ATTACHMENT C EXIT STRATEGY

The termination of interim measures and completion of the remedy program of monitored natural attenuation in the form of groundwater monitoring will occur when the remedial objectives have been met.

In general, the remedial objectives for SWMU 49 and SWMU 54 are to achieve and maintain the remedial goals for groundwater for three (3) years.

Remedial objectives and the requirements for the termination of interim measures/remedy program are detailed in the following approved Work Plans:

- *SWMU 49 Monitored Natural Attenuation Groundwater Monitoring Work Plan, Radford Army Ammunition Plant, Radford, VA. Draft Final. October, 2014.*
 - Sections 1.3, 2.2.3 and 2.6.1
- *SWMU 54 (RFAAP-14) Monitored Natural Attenuation Interim Measures Work Plan, Radford Army Ammunition Plant, Radford, VA. Final. April, 2011.*
 - Sections 1.3, 2.2.3 and 2.6.1

In June 2015, a typographical error detected in Section 2.2.3 of the October 2014 *SWMU 49 Monitored Natural Attenuation Groundwater Monitoring Work Plan* was corrected. This correction is documented in the attached Correction of Typographical Error letter dated June 10, 2015 from CB&I Federal Services to Jim McKenna, RFAAP.

Applicable excerpts from the approved Work Plans for SWMUs 49 and 54 that pertain to the achievement of the remediation objective, the completion of the remedy, and the termination of interim measures/remedy program are included in the following pages of this attachment.

SWMU 49 Excerpts

from

*SWMU 49 Monitored Natural Attenuation Groundwater Monitoring Work Plan,
Radford Army Ammunition Plant, Radford, VA. Draft Final. October, 2014.*

solvents in groundwater. Additional investigation activities included the installation and sampling of four additional monitoring wells (49MW02, 49MW03, 49MW04, and 49MW05) and the sampling of 10 existing vicinity wells. All 14 samples were analyzed for TCL VOCs, TAL metals (total and dissolved), and MNA parameters, including methane, ethane, ethene, chloride, nitrate, sulfate, and TOC. In addition, a human health risk assessment and screening level ecological risk assessment were conducted for SWMUs 48 and 49. Four surface soil samples and three subsurface soil samples were also collected from SWMU 49. Eleven VOCs were detected in the 14 groundwater samples. Six VOCs (1,1 DCA; CT; chloroform; cis-1,2-DCE; PCE; and TCE) were detected above their tw-SLs in the groundwater samples. CT and TCE were the only VOCs found above their MCLs. Detected concentrations of CT ranged to 82.7 µg/L in well 48MW2. Detected concentrations of TCE ranged to 10.7 µg/L in well 48MW3. Detected CT and TCE results from the 2013 Supplemental RFI sampling event are presented in **Table 1-6**.

1.3 Corrective Measures Objectives and Remedial Goals

The Corrective Measures Objectives (CMOs) and Remedial Goals (RGs) were developed in the Draft *SWMU 48/49 RFI Report* (Shaw, 2014). The following is a summary of the findings from that process.

The site-specific CMO for SWMU 49 is to reduce COC concentrations to below RGs/MCLs so as to not adversely impact future beneficial use of groundwater; and to the extent practicable, a goal of restoring site groundwater to the most beneficial use. The groundwater COCs for SWMU 49 have been identified as CT and TCE.

RGs for SWMU 49 Groundwater COCs are shown in **Table 1-5**. These RGs will be used at SWMU 49 to compare to results from groundwater monitoring wells to assess the progress of the MNA.

**Table 1-5
SWMU 49 Remedial Goals**

Chemical of Interest	Groundwater RG/MCL⁽¹⁾ (µg/L)
CT	5.0
TCE	5.0

Notes:

µg/L = micrograms per liter

CT = Carbon tetrachloride

MCL = Maximum Contaminant Level

RG = Remedial Goal

TCE = Trichloroethene

(1) = The RGs are also the MCLs listed in the USEPA 2011 Edition of the Drinking Water Standards and Health Advisories (USEPA, 2011a).



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June 10, 2015

Jim McKenna
Environmental Coordinator
Radford Army Ammunition Plant
Radford, Virginia 24143

Subject: **Correction of Typographical Error - Solid Waste Management Unit (SWMU) 49**
 Monitored Natural Attenuation Work Plan (October, 2014)
 Contract Number W912QR-04-D-0027, Delivery Order DA01

Dear Mr. McKenna,

This correspondence documents the identification and correction of the following typographical error noted in Section 2.2.3 - *Remedial Objectives* of the RFAAP SWMU 49 MNA Work Plan (Shaw, 2014). The typographical error was discovered subsequent to USEPA final approval of the document (December 1, 2014).

The original document incorrectly references Table 1-6 in the above noted section. The correct table reference is Table 1-5 (SWMU 49 Remedial Goals).

A copy of the original document page with the typographical error, page 2-5, and the corrected page is provided as an attachment.

Sincerely,

Timothy Leahy
Project Manager

Attachments

Reference:

Shaw Environmental, Inc. (Shaw). 2014. *SWMU 49 Monitored Natural Attenuation Groundwater Monitoring Work Plan*. Draft Final. October 2014. Radford Army Ammunition Plant, Radford, Virginia.

2.2.2 Groundwater Monitoring System

The groundwater beneath SWMU 49 will be monitored with one existing upgradient groundwater monitoring well; three existing cross-gradient monitoring wells; seven existing disposal area POC wells; and four existing downgradient POC wells. Sampling locations are illustrated on **Figure 1-6**. Monitoring locations/purposes, types, and sampling frequency are shown in **Table 2-2**.

2.2.3 Remedial Objectives

The remedial objective is to achieve and maintain the RGs for the groundwater COCs shown in **Table 1-5** for 3 years in accordance with the Draft *SWMU 48/49 RFI Report* (Shaw, 2014). To accomplish this objective, data from the monitoring and compliance wells will be collected and evaluated against the chemical-specific RGs.

2.2.4 Sampling and Analysis Schedule

All of the wells listed in **Table 2-2** will be sampled in accordance with the methods and procedures specified in the EPA/VDEQ approved Draft *SWMU 48/49 RFI Report* (Shaw, 2014), this WP, and the following schedule:

- a. The wells specified in **Table 2-2** will be sampled for TCL VOCs which include the analysis of the targeted constituents listed in **Table 2-3**. POC wells located within and downgradient of the CT and TCE plumes will be sampled quarterly. The upgradient well and cross-gradients wells will be sampled annually. The sampling frequency for the POC wells will be reduced from quarterly to annually, if VOC concentrations in the well are below RGs in four consecutive quarters. In addition, groundwater samples collected during the first year of monitoring will be analyzed for MNA indicators (TOC, ferrous iron, methane, ethane, ethene, chloride, nitrate, and sulfate), also listed in **Table 2-3**, for the purpose of establishing a baseline concentration of the analyses. For wells that exhibit good degradation, *Dehalococcoides ethenogenes* analysis will also be performed as one more piece of evidence. The off-site analytical laboratory shall analyze these samples in accordance with the sampling and analytical methods listed in *Section 4.0* of this WP. The ferrous iron analysis will be performed in the field using Hach kits.
- b. Static groundwater elevations and total depths will be measured at all wells during each sampling event. Hydrogeologic and physical parameters pH, temperature, turbidity, specific conductivity, dissolved oxygen (DO), and oxidation-reduction potential (ORP) will be measured in the field at each well sampled.

2.3 Measurement and Maintenance of Natural Attenuation Remedy

The groundwater gradient and flow direction in the uppermost aquifer will be calculated annually. Constituent migration rates will be calculated, if necessary, to demonstrate the effectiveness of the MNA process and the groundwater monitoring program. Potentiometric maps showing groundwater elevation contours and flow direction during each sampling event shall be prepared annually.

Natural attenuation is the reduction of COC concentrations in the environment through destructive biological processes (including, but not limited to, aerobic and anaerobic biodegradation, plant and animal uptake), non-destructive physical mechanisms (advection,

2.2.2 Groundwater Monitoring System

The groundwater beneath SWMU 49 will be monitored with one existing upgradient groundwater monitoring well; three existing cross-gradient monitoring wells; seven existing disposal area POC wells; and four existing downgradient POC wells. Sampling locations are illustrated on **Figure 1-6**. Monitoring locations/purposes, types, and sampling frequency are shown in **Table 2-2**.

2.2.3 Remedial Objectives

The remedial objective is to achieve and maintain the RGs for the groundwater COCs shown in **Table 1-6** for 3 years in accordance with the Draft *SWMU 48/49 RFI Report* (Shaw, 2014). To accomplish this objective, data from the monitoring and compliance wells will be collected and evaluated against the chemical-specific RGs.

2.2.4 Sampling and Analysis Schedule

All of the wells listed in **Table 2-2** will be sampled in accordance with the methods and procedures specified in the EPA/VDEQ approved Draft *SWMU 48/49 RFI Report* (Shaw, 2014), this WP, and the following schedule:

- a. The wells specified in **Table 2-2** will be sampled for TCL VOCs which include the analysis of the targeted constituents listed in **Table 2-3**. POC wells located within and downgradient of the CT and TCE plumes will be sampled quarterly. The upgradient well and cross-gradients wells will be sampled annually. The sampling frequency for the POC wells will be reduced from quarterly to annually, if VOC concentrations in the well are below RGs in four consecutive quarters. In addition, groundwater samples collected during the first year of monitoring will be analyzed for MNA indicators (TOC, ferrous iron, methane, ethane, ethene, chloride, nitrate, and sulfate), also listed in **Table 2-3**, for the purpose of establishing a baseline concentration of the analyses. For wells that exhibit good degradation, *Dehalococcoides ethenogenes* analysis will also be performed as one more piece of evidence. The off-site analytical laboratory shall analyze these samples in accordance with the sampling and analytical methods listed in *Section 4.0* of this WP. The ferrous iron analysis will be performed in the field using Hach kits.
- b. Static groundwater elevations and total depths will be measured at all wells during each sampling event. Hydrogeologic and physical parameters pH, temperature, turbidity, specific conductivity, dissolved oxygen (DO), and oxidation-reduction potential (ORP) will be measured in the field at each well sampled.

2.3 Measurement and Maintenance of Natural Attenuation Remedy

The groundwater gradient and flow direction in the uppermost aquifer will be calculated annually. Constituent migration rates will be calculated, if necessary, to demonstrate the effectiveness of the MNA process and the groundwater monitoring program. Potentiometric maps showing groundwater elevation contours and flow direction during each sampling event shall be prepared annually.

Natural attenuation is the reduction of COC concentrations in the environment through destructive biological processes (including, but not limited to, aerobic and anaerobic biodegradation, plant and animal uptake), non-destructive physical mechanisms (advection,

- c. Review of constituent concentrations and evaluation of natural attenuation processes/progress possibly occurring. For example, potential for biodegradation occurrence, detection of daughter products, and general water quality conditions.
- d. Modifications to the Remedy proposed to correct deficiencies/malfunctions or enhance performance.
- e. Provide other recommendations regarding the MNA program, as appropriate.

Sampling frequency for POC wells will be reduced to annually, if COC concentrations in the wells are reported below RGs in four consecutive quarters. A constituent will be removed from the sampling program, if it is consistently found below its respective RGs for 2 consecutive years. Wells will be removed from the monitoring network, if all constituents of concern are found below their respective RGs for 2 consecutive years. If after 2 years of monitoring the MNA plan is not shown to be working, a contingency plan will be developed at that time, as discussed in the SWMU 48/49 RFI Report, Draft 2014, (Shaw, 2014).

2.6.1 Termination of the MNA Program

The MNA program at SWMU 49 will continue until the remedial objective specified in *Section 2.2.3* has been met. The following steps are to be taken in establishing that the MNA objective has been met:

- Termination of the use of MNA as a remedy shall be based on the interpretation and evaluation of the data (concentrations, parameters, and indicators). The data from the following groundwater monitoring wells (13MW3, 13MW4, 48MW1, 48MW2, 48MW3, 48MW06, 49MW01, 49MW02, and 50MW02) must be at or below the RGs to demonstrate that the objectives have been met.
- Notification to terminate the MNA program will be provided to USEPA/VDEQ 60 days in advance together with the pertinent supporting data and evaluations.
- Existing ground monitoring wells will be abandoned in accordance with VDEQ Memorandum dated January 8, 2008 (**Appendix F**).

2.7 Waste Characterization and Off-Site Disposal

The monitoring of natural attenuation of groundwater is expected to generate approximately one 55-gallon drum of purge water for each sampling event.

Purge water and decontamination fluids generated through the wells purged and sampled by Shaw will be containerized in 55-gallon labeled drums and sampled for TAL metals, corrosivity as pH, and chemical oxygen demand (COD) prior to disposal.

2.8 MNA Groundwater Monitoring Schedule

The proposed schedule of project tasks is provided on **Figure 2-2**.

[Note: The project schedule will be updated in each subsequent edition of this Work Plan and will be updated and maintained throughout the project.]

SWMU 54 Excerpts

from

*SWMU 54 (RFAAP-14) Monitored Natural Attenuation Interim Measures Work Plan,
Radford Army Ammunition Plant, Radford, VA. Final. April, 2011.*

a CMS was performed to address the propellant ash material and grossly-contaminated soil under the ash material at SWMU 54. The alternatives evaluated were as follows:

- Alternative One: No Further Action.
- Alternative Two: Excavation of Soil at Area A and Area B, Off-site Disposal, and MNA of Groundwater.
- Alternative Three: Excavation of Soil at Area A and Area B, Off-site Disposal, and Enhanced *In Situ* Bioremediation of Groundwater.

These three alternatives were evaluated using the selection criteria: effectiveness, implementability, and cost. The site-specific Corrective Measures Objective (CMO) for SWMU 54 is to mitigate further leaching of explosives constituents from soil to groundwater at levels that would potentially increase observed concentrations and adversely impact future beneficial use of groundwater, and to eliminate the potential threats to human health and the environment that exist within materials found in SWMU 54. Observations from the SWMU 54 soil investigations indicate that the propellant ash material consisted of a black, ashy material that was very evident when encountered. Therefore, identification and removal of the propellant ash and grossly-contaminated soil will be partially based on visual observations during excavation.

Alternative Two, which entails excavation and off-site disposal as the primary remediation process, was found to achieve the CMO. Therefore, Alternative Two was selected as the final alternative for SWMU 54 because it is implementable and provides a greater level of protection to human health and the environment not provided by other alternatives. In addition, Alternative Two is the sole alternative that facilitates remedial goals (RGs) without potential adverse effects to groundwater (i.e., degradation of secondary water quality parameters) from remedial implementation activities, which would occur with implementation of Alternative Three. By achieving the CMOs, Alternative Two accomplishes the Army's goal for the Installation Restoration Program and its funding source the Environmental Restoration, Army account.

1.3 Corrective Measures Objectives and Remedial Goals

The CMOs and RGs were developed in the Final *SWMU 54 RFI/CMS Report* (URS, 2008). The following is a summary of the findings from that process.

The site-specific CMO for SWMU 54 Area A is to mitigate further leaching of explosives constituents from soil to groundwater at levels that would potentially increase observed concentrations and adversely impact future beneficial use of groundwater; and to the extent practicable, a goal of restoring site groundwater to the most beneficial use. The soil CMOs for Area A have been met and the purpose of this WP is to implement the groundwater IMs to meet the CMOs for groundwater.

The site-specific CMO for SWMU 54 Area B is to mitigate the potential hypothetical future risks that have been identified for exposure to soil under a future construction worker scenario; and to prevent leaching of contaminants of concern (COCs) from soil-to-groundwater at levels that would potentially adversely impact future beneficial use of groundwater. The site-specific CMOs have been met through the soil excavation and off-site disposal completed in 2010.

RGs for Area A are shown in **Table 1-7**. These RGs were used at SWMU 54 to confirm that all COIs were removed from soil to levels that are safe for human health and the environment. The groundwater RGs will be used to compare results from groundwater monitoring wells to assess the progress of the MNA.

**Table 1-7
SWMU 54 Area A Remedial Goals**

Chemical of Interest	Groundwater RG (mg/L)	Groundwater RG Source⁽³⁾	Area A - Soil RG (mg/kg)	Soil RG Source
2,4,6-TNT	0.00782	RG	1.7	SSL ⁴
DNT Mixture	0.000932	RG	0.044 or Lab RL (if higher)	SSL ⁴
RDX	0.0061	RG	0.161	SSL ⁴
Perchlorate	0.0109	RG	--	--
Amino DNTs ⁽¹⁾	--	--	1.095	SSL ⁵
Nitroglycerin ⁽²⁾	--	--	0.069 or Lab RL (if higher)	SSL ⁵
Heptachlor Epoxide ⁽²⁾	--	--	0.0047	SSL ⁵
2,3,7,8-TCDD (TEQ) ⁽¹⁾	--	--	7.89E-06	SSL ⁵

Notes:

TNT = Trinitrotoluene

DNT = Dinitrotoluene

RDX = Hexahydro-1,3,5-trinitro-1,3,5-triazacyclohexane

TCDD = Tetrachlorodibenzodioxin

mg/kg = milligrams per kilogram

mg/L = milligrams per liter

RG = Remedial Goal

RL = Reporting Limit

SSL = Soil Screening Level

(1) =Not identified as COPC in groundwater.

(2) =Not detected in groundwater.

(3) = The lowest of calculated carcinogenic and noncarcinogenic groundwater RGs used (see Appendix G.1, Table G.1-1c in URS, 2008).

Carcinogenic and noncarcinogenic RG values for groundwater COCs (2,4,6-TNT, DNT Mixture, RDX, and perchlorate) calculated using target risk 1E.-05 for the lifetime resident (see Appendix G.1 Table G.1-1c in URS, 2008) and a target hazard of 1 for the adult and child resident (see Appendix G.1 Table G.1-1b in URS, 2008).

(4) = Soil SSL RG values for soil-to-groundwater migration pathway calculated with SSL equation using groundwater RGs as target groundwater concentrations (see Tables G.1-2a - G.1-2c in URS, 2008).

(5) = Soil SSL RG values for soil-to-groundwater migration pathway calculated with SSL equation using T-RSLs as target groundwater concentrations (see Tables G.1-2d - G.1-2g in URS, 2008).

2.2.2 Groundwater Monitoring System

The groundwater beneath SWMU 54 will be monitored with two existing upgradient groundwater monitoring wells; five existing disposal area POC wells; three existing downgradient POC wells adjacent to the New River; and five surface water/pore water sampling locations located as specified on **Figure 2-2**. Monitoring locations/purposes, types, and sampling frequency are shown in **Table 2-2**. Two monitoring wells (54MW-11 and 54MW-12) will be installed for performance monitoring between the POC wells (54MW-2 and 54MW-3) and downgradient wells (54MW-8 and 54MW-10) adjacent to the New River. An additional two wells (54MW-13 and 54MW-14) will be installed north and south of the unit.

2.2.3 Remedial Objectives

The remedial objective is to achieve and maintain the RGs for the groundwater COCs shown in **Table 1-1** for 3 years in accordance with the Final *SWMU 54 RFI/CMS Report* (URS, 2008). To accomplish this objective, data from the monitoring and compliance wells will be collected and evaluated against the chemical-specific RGs.

2.2.4 Sampling and Analysis Schedule

All of the wells listed in **Table 2-2** will be sampled in accordance with the methods and procedures specified in the EPA/VDEQ approved Final *SWMU 54 RFI/CMS Report* (URS, 2008) and this WP and the following schedule:

- a. The wells specified in **Table 2-2** will be sampled for the analysis of the current IM-targeted constituents listed **Table 2-3**. In addition, groundwater samples collected during the first year of monitoring will be analyzed for MNA indicators (total organic carbon, dissolved inorganic carbon, dissolved ferrous iron, dissolved manganese, nitrate, and sulfate) for the purpose of establishing a baseline concentration of the analyses. Analyses shall be obtained using the EPA SW-846 Methods specified in *Section 4* of this WP.
- b. The New River Sediment Pore water/Surface water sampling locations (NRSW-1/PW-1, NRSW-3/PW-3, NRSW-5/PW-5, NRSW-8/PW-8, and NRSW-9/PW-9, all shown on **Figure 2-2**) shall be sampled annually for the analytical parameters in **Table 2-3** using the EPA SW-846 Methods.
- c. Static groundwater elevations and total depths as well as the hydrogeologic and physical parameters pH, temperature, specific conductivity, dissolved oxygen (DO), and oxidation-reduction potential (ORP) will be measured at all wells during each sampling event.

2.3 Measurement and Maintenance of Natural Attenuation Remedy

The groundwater gradient and flow direction in the uppermost aquifer will be calculated annually. Constituent migration rates will be calculated, if necessary, to demonstrate the effectiveness of the IM and the IM monitoring program. Potentiometric maps showing groundwater elevation contours and flow direction during each sampling event shall be prepared at least annually.

- c. Review of constituent concentrations and evaluation of natural attenuation processes/progress possibly occurring. For example, potential for biodegradation occurrence, detection of daughter products, and general water quality conditions.
- d. Modifications to the Remedy proposed to correct deficiencies/malfunctions or, enhance performance.
- e. Provide other recommendations regarding the IM program, as appropriate.

A constituent will be removed from the sampling program if it is consistently found below its respective RGs for 2 consecutive years. Wells will be removed from the monitoring network if all constituents of concern are found below their respective RGs for 2 consecutive years. If after 2 years of monitoring the MNA plan is not shown to be working, a contingency plan will be developed at that time, as discussed in the SWMU 54 RFI/CMS Report, Final September 2008, URS (URS, 2008).

2.6.1 Termination of IM/Remedy Program

The MNA at SWMU 54 will continue until the remedial objective specified in *Section 2.2.3* has been met. The following steps are to be taken in establishing that the MNA objective has been met:

- Termination of the use of MNA as a remedy shall be based on the interpretation and evaluation of the data (concentrations, parameters, and indicators). The data from the following groundwater monitoring wells (54MW2, 54MW3, 54MW4, 54MW5, 54MW7, 54MW8, 54MW9, 54MW10, 54MW11, 54MW12, 54MW13, and 54MW14) and from the pore water/surface water samples must be at or below the RGs to demonstrate that the objectives have been met.
- Notification to terminate the MNA program will be provided to EPA/VDEQ 60 days in advance together with the pertinent supporting data and evaluations.
- Existing ground monitoring wells will be abandoned in accordance with VDEQ Memorandum of January 8, 2008, in **Appendix F**.

2.7 Waste Characterization and Off-Site Disposal

The monitoring of natural attenuation of groundwater is expected to generate approximately (14) 55-gallon drums of non-hazardous soil from monitoring well installation; approximately seven 55-gallon drums of decontamination and well development water from monitoring well installation, and approximately one 55-gallon drum of purge water for each sampling event.

Purge water and decontamination fluids generated through the wells purged and sampled by Shaw will be containerized in 55-gallon labeled drums and sampled for target analyte list (TAL) metals, corrosivity as pH, and chemical oxygen demand (COD) prior to disposal.

2.8 Interim Measures Schedule

The field activities to be performed as part of the SWMU 54 IM began in April 2010. The proposed schedule of project tasks is provided on **Figure 2-3**.

[Note: The project schedule will be updated in each subsequent edition of this Work Plan and will be updated and maintained throughout the project.]