

Region 3 GPRA Baseline RCRA Corrective Action Facility

Giant Resource Recovery – Arvonía, Inc. (Formerly: Giant Resource Recovery, Inc. and Oldover Corp. Arvonía)

Route 1
State Road 652
Arvonía, VA 23004
EPA ID: VAD098443443
Last Update: 07/07/2008

Current RCRA CA Activities

The Virginia Department of Environmental Quality (DEQ) is the lead agency for oversight of Corrective Action (CA) work at the Giant Resource Recovery – Arvonía, Inc., (GRR-Arvonía) facility under the Resource Conservation and Recovery Act (RCRA). The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of the Hazardous Waste Management Permit (Permit) issued to the facility by the DEQ.

The above Permit, effective on October 29, 1995, includes facility-wide CA requirements of the Hazardous and Solid Waste Amendments (HSWA) of the Resource Conservation and Recovery Act (RCRA) of 1984. The above Permit expired on October 29, 2005, but it is currently continued in accordance with 9 VAC 20-60-270.B.51. The permit is administratively continued in accordance with 9 VAC 20-60-270.10(h).1. because the Permittee submitted a new RCRA Permit Application, Parts A and B, on April 29, 2005. This submission date allowed continuance of the existing RCRA Permit in accordance with 9 VAC 20-60-270.10(h).1 because April 29, 2005 was at least 180 days prior to the expiration date of the effective permit. In a letter dated December 29, 2006, DEQ determined that the RCRA Permit Application was administratively and technically complete and stated the Agency's expectation to draft the facility's permit for re-issuance. A draft Permit for re-issuance was sent to EPA, Region III and the DEQ's South Central Regional Office for review on June 25, 2008.

A preliminary soil sampling campaign (Environmental Indicator for Human Health Exposure Study) was conducted in August 2004. The sampling program concentrated on soil-human exposures. Inorganics at elevated concentrations in surface and subsurface soils were identified as being the primary contaminants of concern. The presence of both organics and inorganics in subsurface soils lead to the conclusion that ground water and surface water are potentially impacted by facility operations.

Effective January 2005, Solite, LLC purchased the Solite Corporation's Arvonía facility which is co-located with and contiguous to the GRR-Arvonía facility. The transfer of ownership will not impact the execution of the facility-wide corrective action at this facility as the Solite Corporation's Arvonía facility's Permit requires implementation of CA.

As part of the sale of the Solite Corporation's Arvonía facility, an "Environmental Indemnity Agreement" was signed between Giant Cement Holding, Inc. (GCHI - the parent Company of Solite

Giant Resource Recovery – Arvonía, Inc.
VAD098443443

07/07/2008 RCRA CA Fact Sheet

Page 1 of 6

Corporation), Solite Corporation, and Solite, LLC, which provides the legal framework and Corporate agreements to enable the DEQ to administer CA requirements for the Solite, LLC Permitted facility (EPA ID No. VAD042755082) and the GRR facility (EPA ID No. VAD098443443) through a single primary contact at the GRR facility.

In addition, an Administrative Order of Consent was issued to GCHI by the EPA in December 2005, which addresses CA under both the GRR- Arvonía site under EPA ID No. VAD098443443 and the Solite Corporation/Solite, LLC Permitted facility under EPA ID No. VAD042755082. (As stated previously, the GRR-Arvonía facility is co-located with the Solite, LLC facility in Arvonía.) The above Administrative Order of Consent also requires CA and financial assurance for the two above facilities be conducted under the responsibility of GCHI and that such CA may be conducted through a single primary contact at the GRR facility.

On January 19, 2006, DEQ modified the GRR-Arvonía facility's RCRA Hazardous Waste Permit to include the following four elements:

1. Incorporated the site-wide CA requirements under the Hazardous and Solid Waste Amendments (HSWA) of the RCRA of 1984 into the GRR facility Permit under VAD098443443.
2. Removed the GRR facility's SWMUs and AOCs and inherent corrective action (CA) requirements from the Solite Corporation Permit, under VAD042755082, and incorporated these SWMUs and AOCs into the GRR facility's Permit under VAD098443443.

The Solite Corporation facility's SWMUs and AOCs and CA requirements will remain in the Solite Corporation (new owner Solite LLC) facility's Permit, except for SWMU No. S9, Former Surface Impoundments.

3. Removed and transferred the property described as SWMU No. S9, Former Surface Impoundments, from the Solite Corporation (new owner Solite LLC) facility's Permit, under VAD042755082, and incorporated SWMU No. S9 into the GRR facility's Permit, under VAD098443443. (The land area of SWMU No. S9 has been conveyed by deed of transfer from Solite Corporation to GRR, Inc.)
4. Changed the name of the facility's legal owner for the permitted facility from Giant Resource Recovery, Inc. to Giant Resource Recovery – Arvonía, Inc. The parent company of the Giant Resource Recovery – Arvonía, Inc facility remains unchanged and it continues to be owned by Solite Holding, Inc., which is owned by Giant Cement Holding, Inc. (GCHI).

The CA requirements of the GRR- Arvonía Permit facility, under EPA ID No. VAD098443443, and the Solite Corporation/Solite, LLC Permitted facility, under EPA ID No. VAD042755082, requires both of the facilities to conduct a RCRA Facility Investigation (RFI) for all SWMUs and AOCs identified at their respective sites. However, the Environmental Indemnity Agreement between the owners of the above two facilities and the Administrative Order of Consent between the GCHI and the EPA provides the framework for CA work to be administered and conducted through the GRR-Arvonía, Inc. facility, with responsibility for overall CA at the two sites remaining with the former parent company GCHI.

In January 2006, Solite, LLC, re-submitted a revised Phase I RFI Work Plan, initially dated January 2004, with additional information attached. In August 2006, copies of monitoring well location maps were submitted to enable the DEQ to further the review of the RFI Work Plan and facilitate the completion of the Groundwater EI determination.

The revised RFI Work Plan, dated January 2006, with supplemental information is currently under review by the DEQ.

Site Description

The Giant Resource Recovery - Arvonía, Inc. property is a 1.335 acre tract of land wholly contained within the confines of the Arvonía facility.

The Solite LLC facility (formerly referred to as the A. F. Old Plant) is located on a 917 acre site near Arvonía, in Buckingham County, Virginia. The above facility manufactures lightweight aggregate used in the manufacture of lightweight masonry units, lightweight precast units, and structural concrete.

The Arvonía facility operates three rotary lightweight aggregate industrial kilns that utilize liquid hazardous wastes as fuel. The hazardous waste fuel is stored and mixed/blended in a contiguous Hazardous Waste Management Permitted facility site owned and operated by Giant Resource Recovery-Arvonía, Inc (formerly Oldover, Inc.) under EPA ID No. VAD VAD098443443. The GRR facility transfers the hazardous derived fuel through pipes to the nearby Solite LLC kilns for burning.

On January 19, 2006, the GRR- Arvonía, Inc. facility Permit under EPA ID No. VAD098443443 and the Solite Corporation/Solite, LLC facility Permit under EPA ID No. VAD042755082, were both modified to reflect the transfer by deed of 34.86 acres of land comprising Solid Waste Management Unit (SWMU) No. 9, Former Surface Impoundments for Scrubber Water From Solite Corporation to the GRR-Arvonía, Inc. facility and Permit.

As previously noted, the Solite Corporation's Arvonía facility was purchased by Solite, LLC, and the sale of the Solite Corporation's Arvonía facility did not include the 34.86 acres of land comprising Solid Waste Management Unit (SWMU) No. 9, Former Surface Impoundments for Scrubber Water From Solite Corporation.

However, as noted above, the Environmental Indemnity Agreement between the owners of the above two facilities and the Administrative Order of Consent between the GCHI and the EPA provides the framework for CA work to be administered and conducted through the GRR-Arvonía, Inc. facility, with responsibility for overall CA at the two sites remaining with the former parent company GCHI.

RCRA CA Milestones

To date, the following Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) milestones have been completed at this facility:

- April 17, 1997, National Corrective Action Prioritization System (NCAPS) Report.
- September 10, 1999, RFI Imposition.

- October 29, 1995, Hazardous Waste Management Permit effective, which includes HSWA CA requirements.
- January 2006, Solite, LLC re-submitted the revised Phase I RFI Work Plan, initially dated January 2004, with additional information attached.

Details and supporting documentation regarding the above can be obtained by reviewing files at the DEQ's Central Office or by contacting the project managers identified in this fact sheet.

Environmental Indicator Status

Under the Government Performance and Results Act (GPRA), the Environmental Protection Agency (EPA) set national goals to address high priority RCRA CA facilities by the year 2008. EPA evaluates two key Environmental Indicators (EIs) for each facility: *Current Human Exposures Under Control* and *Migration of Contaminated Groundwater Under Control*. This facility is one of EPA Region 3's high priority facilities and falls under the GPRA initiative.

The DEQ's current evaluation of Environmental Indicators for this facility is as follows:

- *Human Exposures Controlled Determination:* The DEQ has made the EI determination of "yes, that current human exposures are under control." The above determination is based upon the DEQ's Current Human Health Environmental Indicator (HHEI) Determination Report, CA725, dated September 2005. This above HHEI determination is considered current, effective July 7, 2008.
- *Release to Groundwater Controlled Determination:* The DEQ has made the EI determination of "yes, the migration of contaminated groundwater is under control," based upon the review of CA information for the CCP site contained in the EI determination Report, CA 750, dated September 27, 2007. The above EI determination indicates that the migration of "contaminated" groundwater is believed to be under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This EI determination is considered current, effective July 7, 2008.

The RFI will generate supplemental data that will be evaluated with regards to the above EI Determinations and with regards to any potential risks to human health and/or the environment.

Contaminants

The Environmental Indicator for Human Health Exposure Study identified inorganics as the primary contaminants of concern. The study was a limited sampling campaign.

The RFI sampling program will address the full spectrum of organics and inorganics in all environmental media and will complement the findings of the Environmental Indicators for Human Health Exposure Study.

Institutional Controls

The current Permit was issued by the DEQ and became effective October 29, 1995, includes facility-wide CA requirements of the Hazardous and Solid Waste Amendments (HSWA) of the Resource Conservation and Recovery Act (RCRA) of 1984. The above Permit expired on October 29, 2005, but it is currently continued in accordance with 9 VAC 20-60-270.B.51. The permit is administratively continued in accordance with 9 VAC 20-60-270.10(h).1. as the Permittee submitted a new RCRA Permit Application, Parts A and B, on April 29, 2005, which was at least 180 days prior to the expiration date of the effective permit.

Community Involvement

Citizens' questions and concerns may be directed to the contact below. Also, the Administrative Record which contains all documents and information regarding the RCRA CA program for this facility are available for public review at the following location(s):

Virginia Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219
Phone: (804) 698-4194
Contact: Russell McAvoy, Jr., P.E.

The DEQ also maintains a facility mailing list that is used to inform the public of substantial issues and permit administrative actions regarding the facility.

Government Contacts

The Commonwealth of Virginia is the lead CA authority for this project. Please contact the DEQ project manager listed below for details on this project or the contents of this fact sheet.

DEQ Project Manager

Russell L. McAvoy, Jr., PE
Environmental Engineer Senior
Department of Environmental Quality
629 East Main Street
P.O. Box 1105
Richmond, VA 23218
Phone: (804) 698-4194
Fax: (804) 698-4234
E-mail: rlmcavoy@deq.virginia.gov

EPA Project Manager

Mr. Mike Jacobi - 3LC20

U.S. Environmental Protection Agency - Region III

1650 Arch Street

Philadelphia, PA 19103-2029

Phone: (215) 814-3435

E-mail: jacobi.mike@epa.gov

For more information about EPA's corrective action program, including Environmental Indicators, please visit EPA's site at: www.epa.gov/reg3wcmd/correctiveaction.htm

Facility Contact

The facility contact is:

Mr. Stephen P. Holt

Director of Environmental Affairs

Solite Corporation

320 D Midland Parkway

Summerville, South Carolina 29485

Phone: (843) 851-5668

E-mail: sholt@giantcement.com

Fact Sheet Update

The previous fact sheet was updated January 2008. The next fact sheet update is scheduled for January 2009. Previous fact sheets may be obtained through the listed DEQ contact.