



PIEDMONT METAL FABRICATORS

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4-20-93
April 8, 1993

Louisa County Industrial Development Authority

ATTN: Mr. Duke

Mr. Duke:

Enclosed please find EPA report prepared by Armentrout
and the later one prepared by Weston in 1992.

Best regards,

Howard M. Brindle

Howard M. Brindle

**EDWARD H.
BROWNFIELD INC.**
REAL · ESTATE · BROKER



FACSIMILE TRANSMITTAL

TO: Howard Brindle
FAX #: 703/832-7016
FROM: ED Brownfield
RE: AVR Property Louisiana
DATE: 1/28/93

This transmission consists of a total of 12 pages (including this page).
If you have any problems with this transmission, please call (804) 296-3821 and
ask for ED.

SPECIAL NOTE(S)/INSTRUCTIONS:

Howard -
Here is the report from
Weston. It was faxed to me,
I hope that when I fax it to
you it will be readable.
Please call me if it's not and
I will bring you a copy.

Thanks
ED

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**REAL ESTATE TRANSFER
ENVIRONMENTAL ASSESSMENT**

**AVR-LOUISA FACILITY
LOUISA, VA**

DRAFT

14 September 1993

DRAFT

Prepared by:

**Roy F. Weston, Inc.
One Weston Way
West Chester, PA 19380**

W.O. 5794-03-09



1.0 INTRODUCTION

On 22 and 23 July, 1992, WESTON conducted an on-site environmental assessment of the AVR-Louisa site, located east of the town of Louisa in Louisa County, Virginia. The purpose of the assessment was to identify major environmental problems which could affect the environmental status of the property. Information was collected through physical inspection of the facility and its operations, records review, and interviews of site personnel. Mr. Gene Venable (DMI), Mr. Robert Perkins (formerly of ACME) and Mr. John Donivan (formerly of ACME-Louisa; currently at AVR-Crozet), accompanied Ms. Pam Mitzen of WESTON during the site inspection and provided a large portion of the interview information.

2.0 FACILITY OVERVIEW

2.1 Facility Description

The AVR-Louisa site is located 1/2 mile east of the Town of Louisa in the County of Louisa, Virginia. The site is situated along (to the east) State route 33, and south of route 761, which is north of the site. The site consists of a 39.14 acre lot bounded by a large wooded area, an industrial park, a residential area and an office building and its associated lot. There is one building on the property. This building spans 61,412 ft², and its oldest portion is 24 years old. The building was built in stages from 1968 to 1971, and is composed of two main sections. The older brick portion contains the offices and manufacturing area, while the newer prefabricated metal portion contains the warehouse area. A loading dock area is located at the southern end of the warehouse. The site also contains a man-made settling pond and formerly contained a package wastewater treatment unit. Other site appurtenances include a water tower, cable satellite dishes, power and telephone lines, a pump house, and several pole-mounted transformers. These appurtenances are owned by local utilities (phone lines, transformers, etc.) and the town of Louisa (water tank, satellite dishes).



2.2 Property Ownership

The Louisa parcel was used as farm land until 1967 when it was purchased by the Louisa County Industrial Corporation. This corporation proceeded to lease this newly developed property to Fablok Mills for use as a textile manufacturing facility. In September 1970, Fablok assigned the lease to Lawda Industries, Inc. who continued to operate the facility for textile production. Lawda ceased operation at this property in 1974 due to bankruptcy. In March 1975, Acme Visible Records acquired the facility and operated a printing manufacturing process. The facility was eventually purchased by AVR, Inc. in December, 1988. Subsequent to this purchase, AVR, Inc. relocated the printing operation to its Crozet, VA facility and leased the property to DMI Industries, LTD who operated a textile manufacturing facility.

2.3 Aerial Photograph Review

An aerial photograph of the facility taken in March 1984 was examined in order to get a better understanding of the layout, and to determine through visual inspection whether any readily apparent environmental problems exist at the site.

2.4 Surrounding Property Use

The property is bordered on the north by an industrial park, on the south by private residences, on the east by a wooded area, and on the west by residences, an office building and Route 33. The Town of Louisa, located approximately 1/2 mile from the site, has a population of approximately 20,325.

2.5 Agency Information Review

During this assessment, WESTON conducted a review of U.S. EPA region III CERCLIS, RCRA, NPL, and FIELDS lists, and the Commonwealth of Virginia State Priority.



Underground Tank Facility Information Lists to determine if the Louisa facility or any of their neighboring facilities are on the lists. No NPL or SARA Title III sites were located within the area code in which the AVR property lies. One CERCLIS site, two landfills, 23 leaking underground storage tank (LUST) sites, 4 RCRA facilities, and 34 underground storage tank (UST) sites were located within the same zip code as the AVR-Louisa facility. An 8,500 gallon UST does exist on facility property; however this UST was not included on the State list. This is probably due to the fact that the tank has not yet been registered with the State.

During the records review, WESTON also contacted representatives from the Louisa Fire Department, the Commonwealth of Virginia Department of Waste Management, the Virginia Water Control Board, the Virginia Air Board, the Louisa County Assessor's Office, the Louisa County Planning and Zoning Office, the Louisa Water Authority, and the Rappahannock Electric Co-op. In addition to contacts made by phone, visits to the Louisa County Courthouse and the Virginia Department of Waste Management file rooms (including the Solid/hazardous waste file rooms and the Superfund file room) were conducted. As a result of the contacts and reviews, there are no readily apparent potential environmental concerns located on any of the properties adjacent to the AVR facility.

3.0 PRESENT SITE CONDITIONS

3.1 Air Emissions and Asbestos

According to a representative of the Air Board, no air emissions permits currently exist for the site, nor were any such permits ever issued in the past. Throughout the 24-year history of the building oil-fired boilers have been used as a means of heating part or all of the building. In addition, small hooded air ducts were noted on the outer wall of the brick portion of the building during the site inspection. The brick beneath these ducts was stained with a black, powdery substance. None of the personnel interviewed could recall the past



uses of these ducts, and at the time of the inspection, the ducts did not appear to be connected to anything inside the building.

During a 1989 environmental assessment of the site performed by Armentrout and Associates, asbestos was confirmed to be present in the turns and bends along 40 lineal feet of boiler room piping. The asbestos was fully encapsulated in November, 1989.

3.2 Water and Wastewater

The facility currently receives its water from the town of Louisa, as do some of the surrounding properties. Employees interviewed believed that all of the past companies occupying the site used municipal water, and that none of the companies had its own on-site potable water source. According to a Louisa County Water Authority representative, there are no private potable water wells on the facility property. However, there are several private wells located within 1/2 mile of the facility. Facility generated wastewater is currently routed to the Louisa County municipal sewer system. Until 1985, a package wastewater treatment plant was located on the property. The plant, which had a capacity of 20,000 gpd, treated sanitary flows from the building as well as the small wash water flows from cleanup of on-site printing presses, small waste streams developed as a result of the on-site photographic etching processes, and flows conveyed from the roof drains of the brick portion of the building via the settling pond east of the building. According to Mr. Richard Shifflet, a former ACME employee, a silver recovery unit was in place for the photoetching process, so that no silver entered the waste streams which were routed to the treatment plant. Effluent from the plant was routed to a small stream, running north-south through the easternmost portion of the site. This stream eventually joins a tributary to the North Anna River, which eventually flows into the James River. The facility was in possession of a NPDES permit (permit #VA006321) for the discharge described; facility personnel performed regular monitoring of the discharge to meet the requirements of the permit. In 1985, the wastewater treatment plant was disassembled and sold to a neighboring development.



3.3 Solid and Hazardous Waste

The typical waste streams at this facility include general refuse, including paper and cardboard, wooden pallets and waste oil. The refuse has historically been accumulated in on-site dumpsters and removed by a waste hauler to an off-site disposal location. Exceptions to this include the waste oil, which was recycled by ACME, and wooden pallets which were reused. In addition, printing wastes, such as used rags, etc., were disposed at an off-site location or laundered, as described in Subsection 3.4.

During several of the employee interviews conducted concurrent with the site inspection, it was revealed that Lawda had at one time buried debris, consisting mainly of paper, cloth and pallets on-site. Upon acquisition of the property, ACME excavated the area and disposed of the debris at an off-site location. At one point during the site inspection, a pile of wooden pallets interspersed with small amounts of debris was noted in a clearing just south of the pond. Site personnel could not determine the origin.

3.4 Storage Tanks and Materials

Currently, there are one 8,000 gallon UST and one above ground storage tank (AST) at the facility. Facility personnel could not provide a capacity for the AST, but it is known to contain propane fuel for operation of forklifts, etc. As a result of observation during the site inspection, its size can be estimated at approximately 500 gallons. The tank was located just outside the main (brick) portion of the building, and it appeared to be in good condition, with no sign of leakage or spillage in the immediate area. The UST contains #2 fuel oil for use in the boilers. The tank has never been registered with the State. During a 22 July phone conversation with Mr. Jack Ball (Mr. Ball is the State contact for USTs in the area), it was determined that for any tank containing commercial heating oil with a capacity of 5,000 gallons or greater, or for any fuel oil or diesel tank, regardless of size, the UST must be registered with the State. As mentioned above, this UST does not appear on any State list. The UST should be registered. In May of 1983, at the request of ACME,



the UST was tightness tested and found to be tight.

In June of 1989, a potential release from the UST was reported to various agencies, including the Virginia Emergency Response Council, the Louisa County Local Emergency Planning Committee, the National Response Center (U.S. Coast Guard), and the Virginia Water Control Board. The release was discovered during an environmental assessment performed by Armentrout and Associates. It was determined, as stated in the Armentrout report, that the release was not from the body of the tank, but rather was the result of numerous incidents whereby spillage occurred from the fill port due to over filling of the tank. AVR's engineering consultants determined through field testing that soil contamination was confined to an area of six to eight feet in circumference around the fill port, and extending to an approximate depth of two feet. Under the direction of Armentrout, contaminated soil was excavated and removed, with confirmation sampling of the underlying soils to determine that only the excavated soil was left in place. AVR sought approval from the State Water Control Board to forego groundwater sampling, based on its consultant's assurance that groundwater contamination had not occurred. This assurance was based on groundwater sampling at depths up to 6.5 feet. Results from sampling of four wells installed by Armentrout indicated that some groundwater contamination had occurred at the site, but no correlation to the tank releases was made in the Armentrout report. WESTON had the opportunity to review the main body of the report; however the complete data packages from the sampling program were not reviewed by WESTON. While the well water samples were analyzed for the priority pollutants plus forty (PPL + 40), the report text provides only total volatile and semivolatile organic results. No results are shown for those organic constituents typically found in #2 fuel oil. Therefore, it is difficult to assess post facto whether the UST releases have impacted the groundwater at the site. However, existing data in the Armentrout report indicates the presence of volatile organic constituents (VOC) in the groundwater. Confirmation of these findings has not been made.

During ACME's occupation of the site, the following materials were known to have been handled on-site (based on interviews with former employees):



- Propane,
- #2 fuel oil,
- Other oils,
- Hydraulic fluids for forklifts, etc.,
- Various glues and adhesives,
- Various water-based inks,
- Various cleaning solutions for rollers and printing presses, and
- Photographic developing solutions.

The inks were stored in five-gallon cans which were disposed of at an off-site location. Fuel oil used for facility vehicles was recycled at a local gas station. Wastewater was treated at the on-site treatment plant and discharged to a nearby stream, as described in Subsection 3.2. Spills were wiped with absorbent towels which were picked up by a local laundry service. Material Safety Data Sheets (MSDS) were maintained on-site for all of the materials handled as part of printing operations. According to the facility MSDSs, many of the substances used contained volatile and semivolatile organic materials, and chloride and hydrocarbon compounds, various acids and solvents (chlorinated and oil-based).

The three textile manufacturers that have occupied the site (Fablok, Lawda, and DMI) are no longer in existence. Interviews with past employees did not identify the use of large quantities of hazardous materials during the production process. Employees did report that minute quantities of dyes were used in the laboratory area of the plant by Lawda. These were primarily used for experimentation purposes. Large-scale dyeing of the knitted fabrics produced was performed by an outside firm. Therefore, no significant waste streams were produced as a result of dyeing processes on-site. Dye containers were disposed of at an off-site location.

In 1982 a small amount (residues from several 55-gallon drums- approximately 25-30 gallons) of water-soluble adhesive was disposed in an on-site ditch by ACME. The Culpepper Branch of the division of Solid and Hazardous Waste Management was informed,



and the ditch was remediated via excavation. This disposal was a one-time occurrence, and at the time of the disposal, the adhesive was a "non-regulated" substance. Former employees maintained that, with the exception of this adhesive, and the debris buried by Lawda (as described in Subsection 3.3), no other on-site disposal of debris or wastes occurred. During the site inspection, several mounds were noted in the woods bordering the site, many of which had crushed drums and other debris protruding from them or lying atop them. One former employee speculated that the mounds may have been constructed by the Town of Louisa to prevent town water from flowing on-site. This is unsubstantiated.

3.5 PCB Management

Electric service is provided to the property by the Rappahannock Electric Co-op, via the Rappahannock substation. The service provided is 240 and 440 volts, 1000 amp, 3 phase service. According to Bob Wilcox of the Co-op, there is one pad mounted transformer located just outside the building to the east. There are two pole mounted transformers also located on-site. All of these were noted during the 22 and 23 July site inspection. The pole-mounted transformers serve the county water pumps, located nearby. The pad-mounted transformer serves the electrical needs of the building. The transformer is 20 years old, and has not been tested for PCBs. Therefore, the transformer must be properly managed in accordance with the Toxic Substances Control Act. However, based on Mr. Wilcox's knowledge, the manufacturer of the transformer has never produced a transformer which used PCB-containing oils.

3.6 Soil and Groundwater

The site is located in the Piedmont physiographic province of Virginia (Armentrout, 1989). The overburden consists of highly weathered clayey (saprolitic clay) soils. These soils overlay highly fractured bedrock. The site groundwater consists of a single aquifer, the water table aquifer, located in the saprolitic clayey soils. Since a floodplain map does not appear to exist for the site (Powell and Associates, 1991), it is assumed that the site does



not lie within the 100-year floodplain. Groundwater flow is generally to the south, and during a previous environmental assessment (Armentrout, 1989), one upgradient well was established at the north end of the site, and three downgradient wells were established along the southern perimeter.

During the previous assessment (Armentrout, 1989), soil gas, subsurface soil, and groundwater sampling indicated the following:

- Petroleum hydrocarbon constituents were present in soils in the area of the UST as a result of past filling practices;
- Soils containing volatile organic compounds were detected in soils in the area of the loading dock;
- VOCs were identified on one east side of the property;
- VOCs were present in all of the downgradient wells sampled.

The existence or source of these constituents could not be identified based on the past operations of the facility.

During the WESTON inspection, localized areas of stressed vegetation or dry patches of eroded soil were noted at several locations, particularly by roof downspouts. Staining was also noted in the boiler room. DMI representatives explained that this staining was due to a leakage of hydraulic fluid from the compressor in the boiler room. However, with these exceptions, no visible stains or other signs of soil contamination were noted.

4.0 DISCLAIMERS

1. The site evaluation is based on the conditions at the site on the date of the inspection. Past conditions are considered on the basis of readily available records, interviews and recollections. No sampling was conducted at the site for this



assessment. It is possible that past contamination remains undiscovered.

2. This report is based on information provided to or reasonably available to WESTON.
3. WESTON does not warrant or guarantee the property suitable for any particular purpose, or certify the property as clean.
4. This report is based on the current fully implemented environmental regulations. Future regulatory modifications, agency interpretations, or attitude changes may affect the status of the site.
5. Indoor air quality, radon, and wetland specialty surveys were not requested as part of this project. These topics require specialist expertise; a specialty survey can be performed upon request.
6. This document is for informational purposes only and for use by ACCO USA only and shall not be used by any other person for any purpose.

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