



**EXPLANATION OF SIGNIFICANT DIFFERENCES
RECORD OF DECISION -- OPERABLE UNITS 2 & 4
GREENWOOD CHEMICAL SUPERFUND SITE**

I. INTRODUCTION

Site Name: Greenwood Chemical Superfund Site (Site)

Site Location: Newtown, Albemarle County, Virginia

Lead Agency: U.S. Environmental Protection Agency, Region III (EPA)

Support Agency: The Commonwealth of Virginia Department of Environmental Quality (VADEQ)

II. STATEMENT OF PURPOSE

This Explanation of Significant Differences (ESD) for the Greenwood Chemical Superfund Site (Site) is being issued in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA), 42 U.S.C. Section 9617(c), and Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. 300.435(c)(2)(i). The NCP requires publication of an ESD when modifications to a remedial action selected in a Record of Decision (ROD) are necessary, and such modifications significantly change, but do not fundamentally alter, the selected remedial action with respect to scope, performance or cost. This ESD has been prepared to (1) provide the public with an explanation of modifications to the institutional controls that are required by EPA's September 22, 2005 ROD for Operable Units (OU) 2 and 4 (OU2/4 ROD); (2) summarize the information that supports the modifications, and (3) confirm that this modified remedial action complies with the statutory requirements of Section 121 of CERCLA, 42 U.S.C. Section 9621. This ESD has been incorporated into the Administrative Record for the Site. This ESD was released for public comment from June 19, 2013 to July 18, 2013. No comments were received during the comment period.

Specifically, EPA is issuing this ESD to the OU2/4 ROD to:

- Add a land use restriction requiring that any new habitable building constructed on the Site be constructed in a manner that protects occupants from vapor intrusion of contaminants from underlying contaminated groundwater; and,
- Expand the types of institutional controls that may be used to (1) implement the land and groundwater use restrictions selected by EPA in the OU2/4 ROD and (2) grant access to the Commonwealth of Virginia.

The above-listed modifications to the OU2/4 ROD do not fundamentally alter EPA's selected remedy with respect to scope, performance, or cost. Therefore, a ROD amendment is not necessary.

III. SUMMARY OF SITE HISTORY AND SITE CONDITIONS

A. Site History

The Site is located at 637 Newtown Road in the village of Newtown, Albemarle County, Virginia between the cities of Waynesboro and Charlottesville. See Figure 1. The Site encompasses 33.59 acres, of which approximately 18 acres were used for chemical manufacturing and waste disposal activities. Greenwood Chemical Company (GCC) owned and operated the Site beginning in approximately 1968. GCC is defunct and there is no current taxpaying property owner.

Chemical manufacturing operations began in approximately 1947 under the name of Cockerille Chemical Company. The facility was sold to Greenwood Chemical Company in 1968 and continued to operate under that name until its closure. GCC operated a small volume batch chemical manufacturing plant at the Site. In 1985, a toluene vapor fire destroyed the main processing building and resulted in the death of four workers. The plant ceased operations shortly thereafter. The plant produced chemicals for application in industrial, agricultural, pharmaceutical and photographic processes. The primary compounds manufactured at the Site during the 1980s included naphthalene acetic acid, 1-naphthaldehyde, and naphthoic acid. In addition, arsenic salts were used as catalysts in the production of chloromethylnaphthalene, an intermediary in the production of naphthalene acetic acid. Production processes used toluene, naphthalene derivatives, sodium cyanide and inorganic arsenic salts. Manufacturing activities involved the handling of large numbers of drums containing waste, feedstock, intermediate and final products.

In the course of these operations, liquid wastes were discharged through floor drains in the process buildings to a series of unlined lagoons adjacent to the plant. The unlined lagoons were interconnected by drainage ditches or above-ground piping. Liquid hazardous waste was routinely spilled onto process building floors and drained into the ground beneath and adjacent to the process buildings. In addition, drums were systematically buried on Site property. Trenches were used for the disposal of large quantities of 55-gallon drums containing hazardous substances. This activity resulted in the contamination of soil, groundwater, surface water and lagoon sludge. Contamination in groundwater consists primarily of volatile organic compounds (VOCs) including the chlorinated solvents carbon tetrachloride, tetrachloroethene (PCE), trichloroethene (TCE), and 1,2-dichloroethane.

Between 1987 and 2006 EPA dismantled and removed the former chemical production buildings and other plant features including waste lagoons and buried drums. The property has been cleaned up to the point that it can be safely reused for agricultural, recreational or industrial purposes, however, groundwater contamination remains beneath the Site and is being contained by a pump and treat system. See Section IV, below, for a summary of the selected remedy and implementation of response actions.

B. Physical Characteristics and Land and Resource Use

The Site property is zoned for agricultural use only but the Site is currently inactive except for an on-Site water treatment plant for recovered groundwater operated and maintained by Virginia Department of Environmental Quality (VADEQ). See Figure 2. The entire Site is enclosed by a chain-link fence. The gate is opened during weekday business hours to accept deliveries at the treatment plant. The gate is locked in the evenings and on weekends.

The setting is rural and land use surrounding the Site is generally undeveloped woodlands or agricultural. There is a residential area along Summers Rest Road east of the northern Site boundary. The Mt. Zion Baptist Church is located adjacent the northwest corner of the Site. The Mt. Zion Baptist Church owns the undeveloped woodland along the western property boundary. The property east and south of the Site is agricultural and is currently used for cattle pasture. The farms in the area are generally over 100 acres and include a residence. Interstate 64 passes 100 yards north of the Site.

Groundwater beneath the Site is not currently being used, however, surrounding properties do utilize groundwater for potable and agricultural purposes. The area surrounding the Site is not presently serviced with public water. The closest residential well is located approximately 400 feet from the Site, while the closest downgradient well is approximately 2,500 feet from the Site. The dominant groundwater flow direction is to the east-southeast in the direction of Stockton Creek and its tributaries. The topography slopes to the south-southeast and levels off at the southern end of the Site.

Surface water features on the Site are limited to a small pond, referred to as "South Pond," and several intermittent streams which serve as tributaries to a perennial stream designated as "West Stream" located south of the Site. The groundwater treatment plant discharges clean water to one of the intermittent streams flowing to West Stream. West Stream meanders through cattle pastures and ultimately enters Stockton Creek several miles south of the Site.

The majority of the Site is covered with overburden ranging in thickness from 0 - 15 feet. Groundwater at the Site is present in both the overburden and underlying fractured bedrock. Two distinct water bearing units (aquifers) have been identified in the overburden and bedrock. Aquifer testing indicates that the two water bearing units exhibit a high degree of hydraulic interconnection sufficient to consider the two units to be part of a single aquifer system. Significant movement within the bedrock is limited to its uppermost 50 feet. The water table at the Site generally follows surface topography and is encountered at depths ranging from 5 feet to 35 feet below ground surface.

IV. DESCRIPTION OF RODs, PREVIOUS ESDs, AND REMEDY IMPLEMENTATION

A. Operable Units 1 and 3

1. Remedy Selection

On December 29, 1989, EPA issued the OU-1 ROD selecting a remedy to address contaminated soils remaining in the lagoons and other disposal areas after emergency removal actions had been completed. The ROD developed cleanup standards for each contaminant considering: 1) the direct contact exposure route; and, 2) its potential to migrate from soil to groundwater. The major components of the selected remedy consist of:

- Excavation of soil exceeding risk-based cleanup levels (soil associated with Lagoons 1, 2, 3 and Backfill North were estimated at 4,500 cubic yards);
- Off-Site treatment of contaminated soil in a Resource Conservation and Recovery Act (RCRA)-permitted thermal destruction facility (i.e., incinerator);
- Treated soil was to be analyzed and stabilized/solidified in compliance with RCRA land ban restrictions, if necessary, prior to its disposal in a RCRA-permitted Subtitle C landfill;
- Excavated areas were to be backfilled with clean fill and re-vegetated; and,
- Abandoned chemicals located in on-Site buildings were to be treated via thermal destruction and disposed of off-Site.

An Explanation of Significant Differences (ESD-1) augmenting the remedy selected in the OU1 ROD was issued on July 17, 1991. The OU1 ROD had been issued based on preliminary nature and extent of contamination data available at the time. The final RI Report completed in September 1990 identified additional contaminated soils exceeding risk-based soil cleanup levels (identified in the OU1 ROD) extending beneath on-Site Process Buildings A, B and C. Removal of process buildings and waste chemicals are referred to as OU3 for administrative tracking purposes. ESD-1 required the removal of the process buildings to allow delineation of soils exceeding cleanup levels. The primary changes described in ESD-1 were:

- Process Buildings A, B, and C were to be dismantled, decontaminated to the extent possible and appropriately disposed of in an off-Site landfill;
- Contaminated demolition debris was to be disposed of in a RCRA Subtitle C landfill; and
- Nonhazardous debris was to be disposed of in a RCRA Subtitle D landfill.

A second Explanation of Significant Differences (ESD-2) modifying the remedy selected in the OU1 ROD was issued on March 24, 1994. ESD-2 presented the findings of soil sampling completed during pre-design activities in the footprint of the demolished process buildings and other disposal areas refining the extent of contamination estimates. ESD-2 determined that contaminated soils in the source areas to be addressed by OU1 extended beyond the depth of feasible excavation. The ESD-2 also determined 15-feet to be the practical limit of cost-effective excavation and established that EPA would evaluate appropriate response actions for the deeper contaminated soils as Operable Unit 4 (See Section IV.D.1, below, for a summary of the selected

remedy for OU4). Further, ESD-2 modified the cleanup levels presented in the OU1 ROD based on an extensive fate and transport modeling program completed as part of pre-design activities¹. The fate and transport model used more site specific information and a revised model.

ESD-2 determined that the remedy for OU1 would address contaminated soil in the following additional areas of the Site:

- The Backfill North area extending to and beneath former Process Building A;
- An area including the location of former process Buildings B and C; and
- The former Drum Disposal Area, the Waste Dump area, and the Northeast Drum Area.

The area of contaminated soil requiring remediation increased from the 1.5 acres estimated in the original OU1 ROD to approximately 7 acres. The estimated volume of soil to be transported off-Site for treatment and/or disposal increased from 4,500 cubic yards to approximately 11,000 cubic yards. ESD-2 also noted the following clarification to the original remedy:

- Certain areas on the Site were only contaminated with elevated levels of arsenic. These arsenic-contaminated soils do not pose an unacceptable risk through the groundwater pathway but only through direct contact.

Noting that the incineration technology selected for OU1 is inappropriate for arsenic, EPA deferred the remediation of these arsenic-contaminated soils to a subsequent decision document. See Section IV.C.1, below, for a summary of 2004 Removal response actions, including removing the arsenic-contaminated soil.

2. Remedy Implementation

The work associated with OU1 ROD as modified by ESD-1 and ESD-2 began in December 1991 and was completed on September 3, 1997. Major milestones included:

- Installation of a security fence;
- Removal of abandoned chemical containers in and around the buildings;
- Demolition, decontamination and off-Site disposal of 4 concrete block buildings (process buildings A, B and C and a laboratory/office building);
- Removal of metal shed (storage shed/garage); and,
- Decontamination and proper disposal of six aboveground chemical storage tanks, one underground chemical storage tank and associated piping;
- Excavation of approximately 11,000 yd³ of contaminated soil from the areas discussed above;
- Shipment by rail of contaminated soils to a thermal destruction facility (incinerator) in Utah for treatment;
- Disposal of residue (ash) in an adjacent RCRA Subtitle C landfill;

¹ The soil performance standards established in ESD-2 were the only soil performance standards implemented.

- Implementation of stormwater drainage controls around excavation areas; and,
- Backfilling, regrading and revegetation of excavation areas.

B. Operable Unit 2 (Interim ROD)

1. Remedy Selection

On December 31, 1990, EPA issued an Interim ROD for OU2 selecting a pump and treat remedy to minimize migration of contaminated groundwater toward residential wells. The Interim ROD was considered "interim" because the selection of groundwater cleanup goals was deferred to a subsequent ROD after further study. The remedial action objectives were to minimize migration of contaminants toward residential wells, eliminate unacceptable environmental risks in Lagoons 4 and 5, and obtain additional information regarding aquifer characteristics to assist in designing a final groundwater remedy. The major components of the selected remedy in the Interim ROD for OU2 consist of:

- Installation and operation of groundwater recovery wells to prevent migration of contaminated groundwater from the Site;
- Monitoring the effectiveness of the groundwater extraction network and systematic optimization to meet objectives over time; and
- Construction and operation of a water treatment plant to treat the recovered groundwater and surface water collected in Lagoons 4 and 5. The treatment plant discharge to surface water (tributary to West Stream) and must meet Virginia Pollutant Discharge Elimination System, Virginia Code §§ 62.1-44.15 through 44.30 (VPDES), criteria.

2. Remedy Implementation

The work associated with OU2 ROD began in September 1998 and construction of the groundwater pump and treat system was determined to be complete on September 19, 2003. Major milestones included the following:

- Installing and operating five bedrock groundwater recovery wells (BR-2, BR-7, MW-23, BR-8 and BR-6);
- Installing a floating pump assembly and pumping surface water from Lagoon 5 to the on-Site water treatment plant;
- Constructing a water treatment plant utilizing the following treatment train: precipitation, ultraviolet/chemical oxidation and carbon adsorption;
- Installing plumbing necessary to convey recovered groundwater and lagoon surface water to the treatment plant;
- Beginning to operate the water treatment plant so that discharge consistently achieves VPDES criteria; and
- Installing an expanded monitoring well network.

C. 2004 Removal

1. Response Action

On June 22, 2004 EPA issued an Action Memorandum to properly close out Lagoons 4 and 5, and to address the remaining arsenic-contaminated surface soil. The primary components of the removal response action consisted of:

- Excavation and off-Site disposal of contaminated lagoon sludge (Lagoons 4 and 5) and surface soil with arsenic concentration greater than 27 mg/kg; and
- Backfill with two feet of clean soil.

2. Implementation

The Response Action began in June 2004 and was completed in June 2005. Major milestones included the following:

- Drained the lagoons by pumping the water to the on-site treatment plant;
- Approximately 19,500 tons of arsenic-contaminated soil and sludge was excavated, sampled and appropriately disposed in a solid waste landfill.
- The former lagoons and soil excavations were then backfilled with clean soil and seeded.

D. Operable Unit 2 (Final) and Operable Unit 4

1. Remedy Selection

On September 22, 2005, EPA issued a final ROD for groundwater (OU2) and deep soil contamination² (OU4) (OU2/4 ROD). The OU2/4 ROD established groundwater performance standards for the second operable unit interim action pump and treat system. In addition, the OU2/4 ROD defined the area including the deep soil contamination as a "waste management area." See Figure 3. The OU2/4 ROD selected hydraulic containment of the waste management area utilizing an enhanced version of the pump and treat system selected for interim OU2. The remedial action objective was to contain the contaminant plume within the waste management area and to restore groundwater quality in the area of attainment. The response action was based on the Groundwater Investigation and Focused Feasibility Study (GWI/FFS) completed in June 2005. The GWI/FFS included a groundwater capture zone analyses that recommended additional wells be added to the existing five-well groundwater extraction network.

In summary, the groundwater pump and treat system and associated groundwater cleanup standards was the selected remedy for OU2 and OU4. The risk-based performance standards are specified in Table 1 and will be achieved throughout the area of attainment within 30 years. The major components of the selected remedy for OU2 and OU4 consist of the following:

² Deep soil contamination located beneath areas excavated during OU1 remedial action is referred to as OU4.

- Operation of an enhanced groundwater pump and treat system to prevent migration of contaminated groundwater to the area of attainment³;
- Treatment of recovered groundwater to achieve VPDES discharge standards prior to discharge to on-Site stream;
- Soil cover over the former drum disposal and manufacturing areas⁴;
- Long-term groundwater monitoring; and,
- Institutional controls to be implemented and maintained by the property owner to ensure that prospective users of the Site are aware that deep soil contamination is present, and to prevent: the extraction of groundwater from the aquifer beneath the Site for use as a potable water source; any interference with the groundwater extractions wells, treatment system, and related equipment; and any removal of the soil cover without written permission of VADEQ, and EPA as appropriate.

2. Remedy Implementation

The work associated with the Final OU2/4 ROD was implemented as optimization upgrades to the in-progress interim OU2 remedy. Construction upgrades to the system were completed in December 2005. The major components of the enhanced pump and treat remedy implemented at the Site include:

- Installation and operation of six additional recovery wells; and
- Long term groundwater monitoring was refined to measure effectiveness of recovery well network.

However, institutional controls have not yet been established because the former property owner abandoned the Greenwood Chemical Property.

E. System Operation and Maintenance

The long-term operation, maintenance and monitoring requirements for the Site are set forth in the final OU2/4 ROD. The expanded 11-recovery well network has been in operation since December 2005. On March 15, 2012, EPA transferred responsibility for ongoing operations to VADEQ.

The remedial action objective was to contain the contaminant plume within the waste management area and to restore groundwater quality in the area of attainment. It is understood and expected that groundwater within the area defined as the Waste Management Area will continue to exhibit high concentrations of volatile chemicals in the long term.

There are 59 groundwater wells located across the Site and hydraulically down gradient of the Site. The VADEQ Operations, Maintenance and Monitoring plan includes quarterly and annual water quality monitoring; water level measurements are collected to generate potentiometric maps. Flow rates and water quality data from extraction wells are reviewed along

³ The groundwater pump and treat system was initiated per interim OU2 ROD. The final OU2/4 ROD established groundwater cleanup goals and an "area of attainment" setting forth the point of compliance.

⁴ Installation of the clean soil cover was completed during the 2004/2005 removal response activities.

with potentiometric maps to evaluate the effectiveness of the recovery well network in establishing hydraulic containment of the waste management area and to track progress toward achieving performance standards throughout the area of attainment. The goal is to restore the aquifer in the area of attainment (beyond the boundaries of the Waste Management Area) within approximately 30 years.

Recent groundwater monitoring data demonstrates that concentrations of contaminants in ground water outside the Waste Management Area have been declining. The plume of contaminated groundwater exceeding MCLs has been confined to the Greenwood Chemical site property. However, groundwater within the Waste Management Area is expected to remain highly contaminated with volatile chemicals as the remedial action objective is containment within the Waste Management Area. The following volatile contaminants of concern (COCs) have been measured at concentrations several orders of magnitude above its respective safe drinking water standard (MCL) within the Waste Management Area:

- 1,2-dichloroethane (up to 860 µg/l)
- Carbon tetrachloride (up to 12,000 µg/l)
- Tetrachloroethene (up to 100 µg/l)
- Trichloroethene (up to 1,800 µg/l)

The promulgated MCL for each chemical listed above is 5.0 µg/l.

V. DESCRIPTION OF SIGNIFICANT DIFFERENCES AND THE BASIS FOR SUCH DIFFERENCES

A. Vapor Intrusion

Vapor intrusion is the migration of volatile organic chemicals (VOCs) from the subsurface into overlying buildings. VOCs in contaminated groundwater can emit vapors that may migrate through subsurface soil and into air spaces of overlying buildings. In most cases, the chemical concentrations are low or vapors may not be present at detectable concentrations depending on site-specific conditions. However, in extreme cases, the vapors may accumulate in such buildings to levels that may pose safety hazards, acute health effects or aesthetic problems.

At the time that the OU2/4 ROD was issued EPA did not consider the potential for groundwater contaminated with volatile organic compounds becoming a source of VOC vapors migrating to and infiltrating habitable buildings and presenting potentially unsafe exposure people. While conducting the Third Five-Year Review for the Site, EPA recommended that the potential for vapor intrusion into structures be assessed.

Groundwater monitoring demonstrates that the plume of contaminated groundwater exceeding MCLs has been confined to the Greenwood Chemical site property (See Figure 3) and there are no existing habitable buildings⁵ on or off Site close enough to the plume to be at risk.

⁵ The only existing habitable building on Site is the water treatment plant which has been subject to air sampling and modeling and determined to be safe for plant workers.

However, groundwater within the Waste Management Area is contaminated with volatile chemicals measured at concentrations several orders of magnitude above its respective MCL and the water table is relatively shallow.

In 2008, EPA endorsed the “multiple lines of evidence” approach as presented in the Interstate Technology & Regulatory Council (ITRC), “Vapor Intrusion Pathway: A Practical Guideline,” published January 2007. This 2007 guidance indicates that additional investigations should be performed if the shallow groundwater contamination exceeds MCLs; buildings within 100 feet of a VOC plume should be evaluated for vapor intrusion⁶. However, a definitive investigation requires specific information regarding both the location of the building and the materials and techniques used for construction. In other words, EPA has determined that there is potential for vapor intrusion into future buildings constructed on Site where VOCs exceed their respective MCLs by several orders of magnitude in the shallow groundwater, but it is impossible to complete a definitive study without the building having already been constructed. EPA believes that there is a potential for vapor intrusion to expose human receptors to unacceptable levels of contamination should an indoor air pathway be created through construction of a building.

Accordingly, the Institutional Controls component of the remedy is being modified by this first ESD to the OU2/4 ROD to minimize potential occupant exposure to Site-related VOCs in the event that habitable buildings are constructed on Site. Since COCs in the groundwater in the vicinity of the Waste Management Area on the Site are several orders of magnitude above the MCLs, ICs applicable to building construction are necessary to ensure that future users of the Site property are protected from vapor infiltration. EPA hereby modifies the remedy selected in the OU2/4 ROD to require the following land use restriction in order to prevent human exposure to vapor intrusion of contaminants from groundwater at the Site:

- All new habitable buildings constructed over or within 100 feet of the groundwater contaminated by VOCs above MCLs should include, at a minimum, a foundation vapor barrier and the subsurface piping for a sub-slab depressurization system. Prior to occupancy, the indoor air in the buildings shall be tested. If indoor air concentrations are equal to or exceed EPA risk-based criteria, the sub-slab system shall be activated and operated, until such time as EPA, in consultation with VADEQ, determines that the groundwater contamination no longer poses a vapor intrusion risk.

B. Implementation of Institutional Controls

EPA selected the following land and groundwater use restrictions in the OU2/4 ROD:

1. a deed notice identifying the Site as a Superfund Site and prohibiting (1) residential use of the property, (2) on-Site potable use of ground water, (3) any activity that would adversely impact the operation of the pump and treat system, (4) any removal of the soil cover without written permission of the EPA and/or VADEQ and (5) deep excavation without a site-specific health and safety plan. Any soil excavated from the former

⁶ This protocol is also consistent with the proposed “OSWER Final Guidance for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Sources to Indoor Air”

Manufacturing or Drum Disposal Areas would need to be sampled and managed in an appropriate manner; and,

2. the granting of easements for Site access to the Commonwealth of Virginia (and their designees if requested) to monitor the constructed remedy, operate and maintain the ground water treatment system, and ensure that restrictions on land use are being maintained.

However, Greenwood Chemical Company abandoned the Site property, stopped paying property taxes and reportedly dissolved as a company before the above-listed restrictions were implemented and before an easement was granted to the Commonwealth of Virginia (the Commonwealth). There is currently no party authorized to enter into such easement for the Site property.

Consequently, EPA has expanded the types of institutional controls that may be used to implement the restrictions and grant access as listed in Paragraphs V.B.1. and 2, above. EPA has determined that while there is no owner of record for the Site property, the restrictions may be implemented through other forms of notice including listing on State or local Registries of Contaminated Sites and advisories. In addition, in the event that the Site property is acquired, EPA will implement the restrictions through enforceable ICs such as a judicial consent decree, administrative order, or an Environmental Covenant pursuant to the Virginia Uniform Environmental Covenants Act, as adopted in 9VAC15-90 (UECA).

With respect to granting access to the Commonwealth, in recognition that the Site had been abandoned, pursuant to Virginia Code § 10.1-1406.1, the Circuit Court of Albemarle County granted access to VADEQ under Court Order (Case No.: CL12000268-00) for the purpose of performing remediation at the Site. Therefore, EPA is expanding the types of institutional controls that may be used to grant access to the Commonwealth to include orders and covenants.

VI. SUPPORT AGENCY COMMENTS

The changes to the OU2/4 ROD as described in this ESD have been coordinated with representatives of VADEQ pursuant to 40 C.F.R. Section 300.435(c)(2). VADEQ supports the modification set forth herein.

VII. STATUTORY DETERMINATIONS

EPA has determined that the modified remedy as described in this first ESD to the OU2/4 ROD complies with the statutory requirements of Section 121 of CERCLA, 42 U.S.C. § 9621. EPA believes that the remedy, as revised by this ESD, will protect human health and the environment, is cost effective, and meets the Federal and State requirements that are applicable or relevant and appropriate to the Remedial Action as described in the OU2/4 ROD.

VIII. COMMUNITY INVOLVEMENT

In accordance with Section 117(d) of CERCLA, 42 U.S.C. Section 9617(d) and Section 300.435(c)(2)(i)(B) of the National Oil and Hazardous Substances Pollution Contingency Plan, EPA published a notice of availability of a proposed ESD in the Daily Progress in Charlottesville, Virginia on June 19, 2013 announcing the public comment period starting June 19 and closing July 18, 2013. EPA did not receive any comments during this period.

The Administrative Record includes the documents that form the basis for EPA's selected remedy for the Site, including the documents supporting this ESD. The Administrative Record is available for public review at the following locations:

Jefferson-Madison Regional Library
5791 Three Notched Road
Crozet, VA 22932
434-823-4050

EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029
215-814-3157

or

on the internet at.

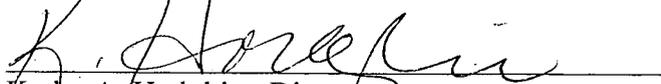
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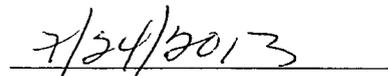
Questions concerning EPA's action and requests to review the Administrative Record at EPA's office can be directed to:

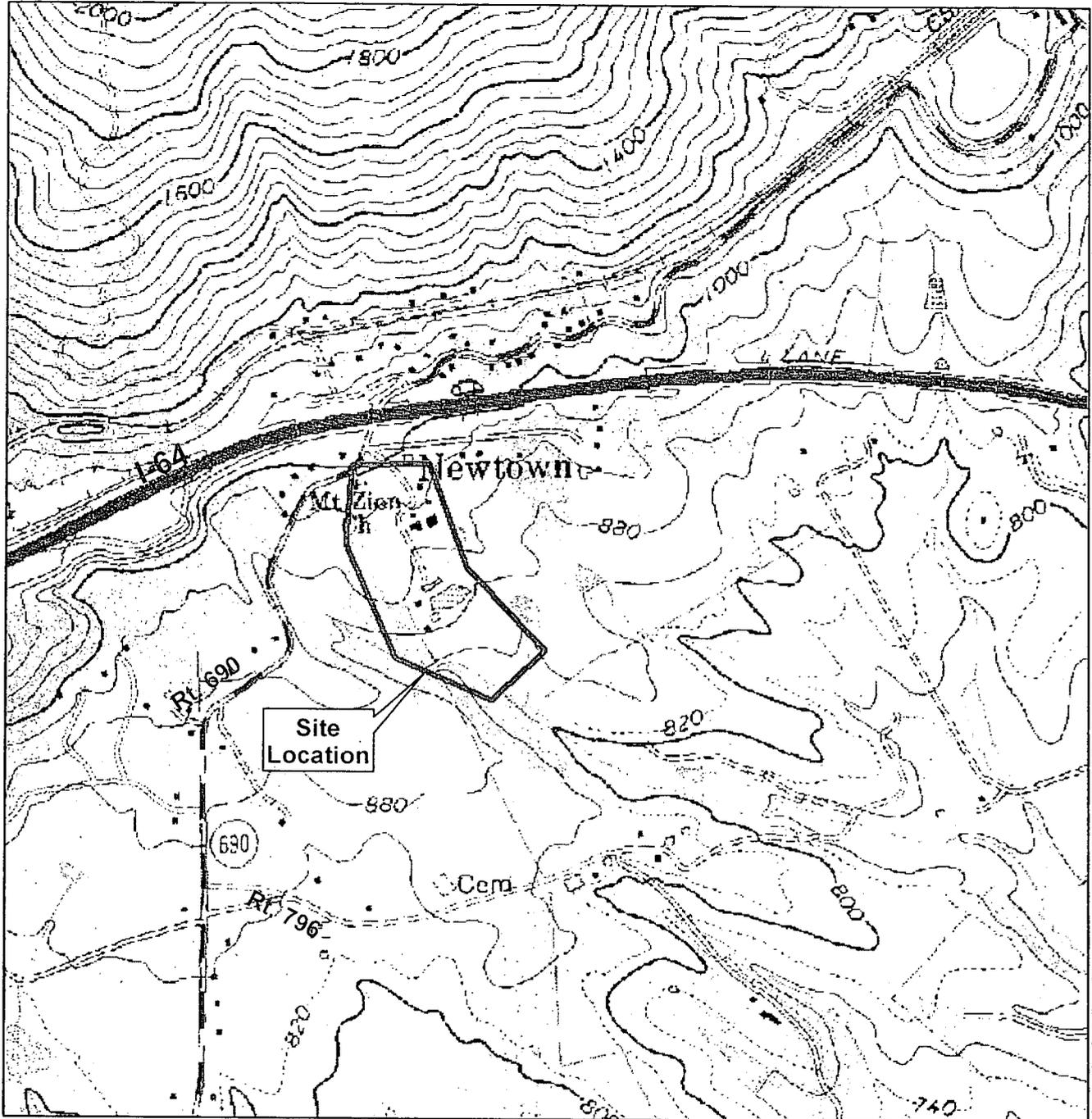
Mr. Eric Newman, Remedial Project Manager
U.S. Environment Protection Agency - Region III
1650 Arch Street, 3HS23
Philadelphia, PA 19103-2029
(215) 814-3237
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IX. SIGNATURE

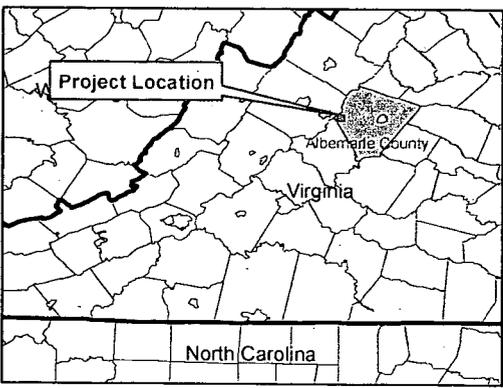
This Explanation of Significant Differences modifies the institutional controls requirements of the OU2/4 ROD for the Greenwood Chemical Superfund Site.


Kathy A. Hodgkiss, Director
Hazardous Site Cleanup Division
EPA, Region III


Date



ECA \ \Project\1000001\400001\4724_Greenwd_Chem\GM\Documents\G00\Figures\Fig-1Site_Location_Map



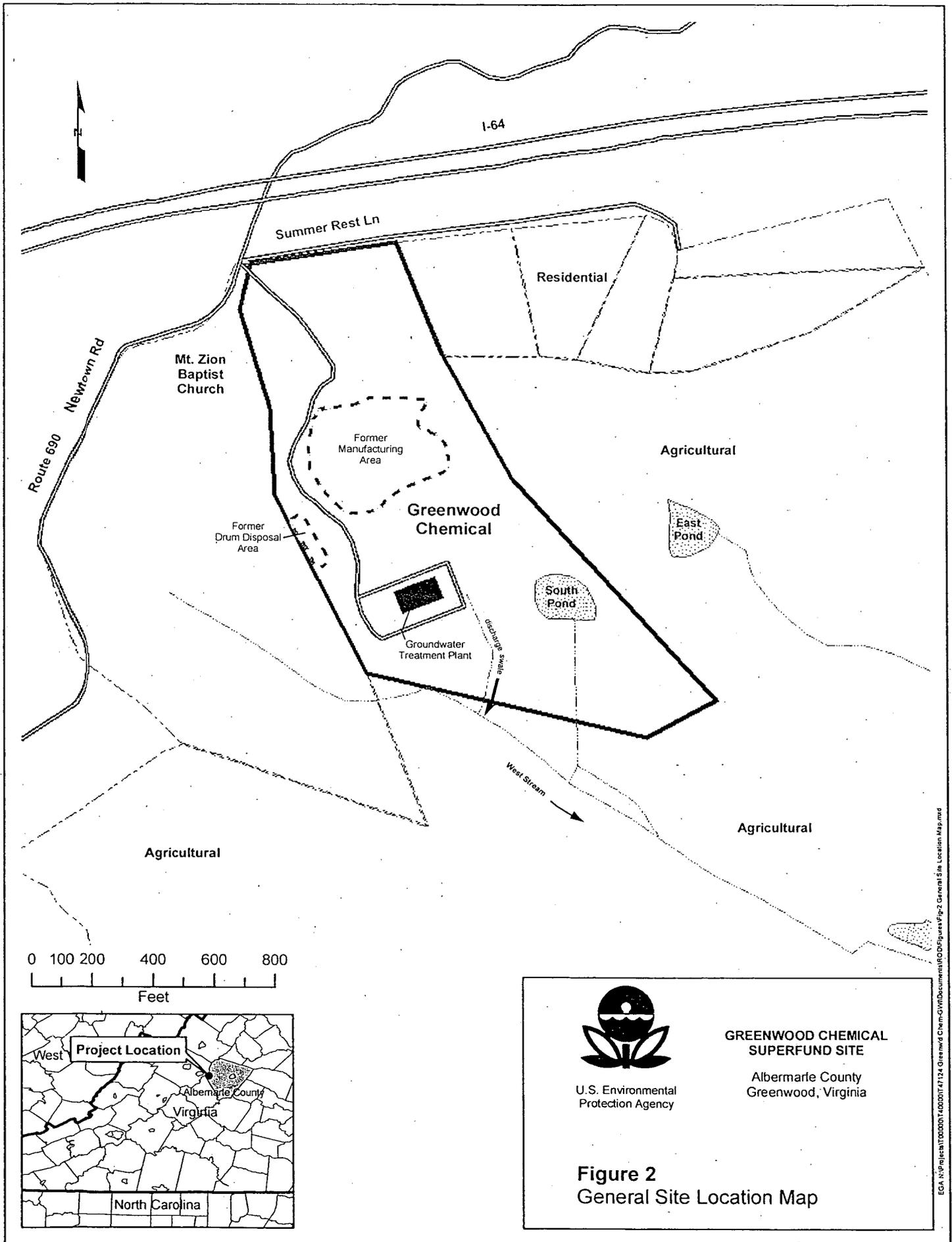


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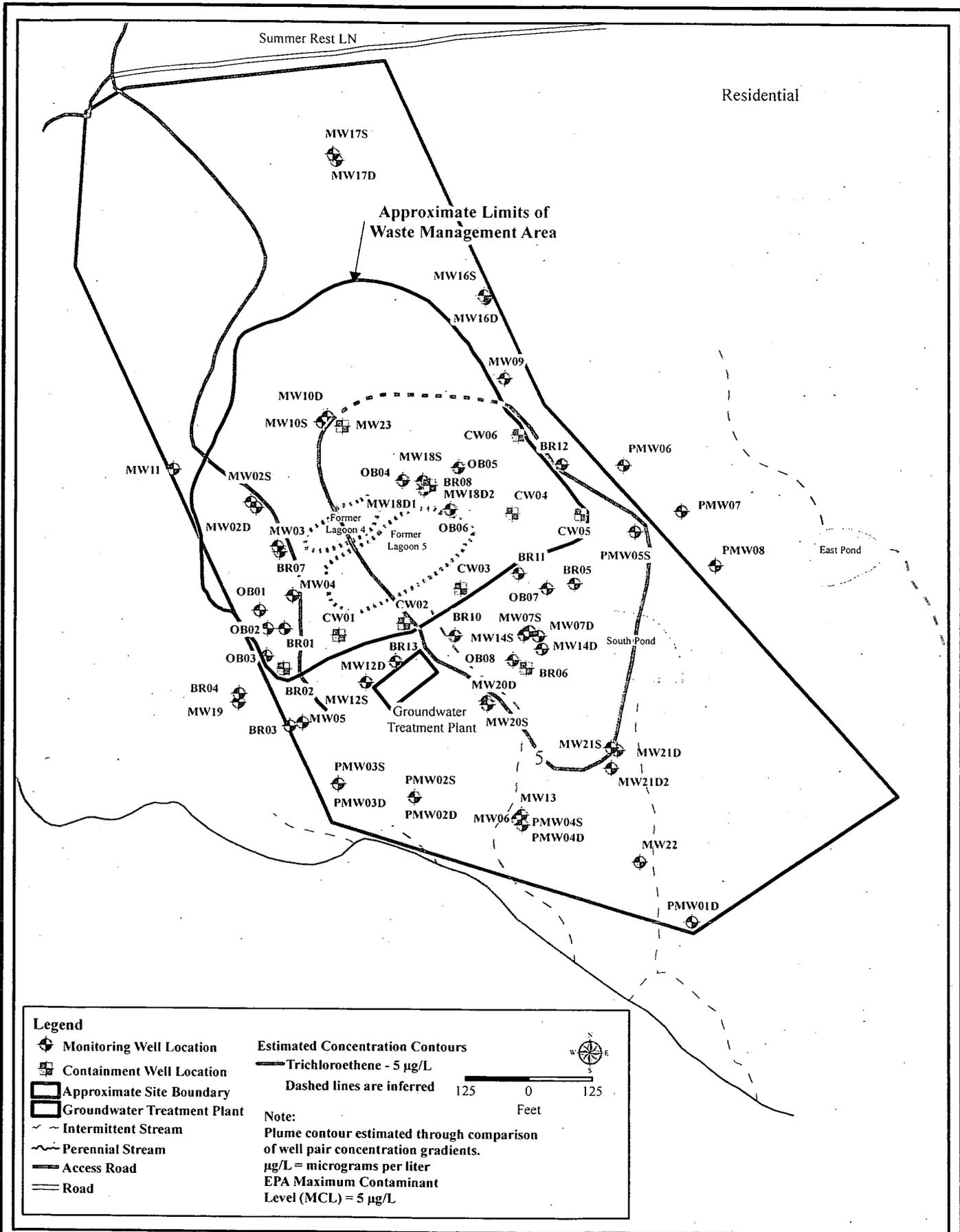
**GREENWOOD CHEMICAL
SUPERFUND SITE**

Albemarle County
Greenwood, Virginia

Figure 1
Site Location Map



ECA:\Projects\1000001400001\7174 Greenwood Chem-CVI\Documents\FOD\Figures\Fig-2 General Site Location Map.mxd



U.S. Environmental Protection Agency, Greenwood Chemical Site
 Albemarle County
 Greenwood, VA

Figure 3
 5 µg/L Concentration Contour for
 Trichloroethene
 First Quarter 2012