

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**  
Interim Final 2/5/99  
**RCRA Corrective Action**  
**Environmental Indicator (EI) RCRIS code (CA750)**  
**Migration of Contaminated Groundwater Under Control**

**Facility Name: LTV Aliquippa (Formerly: Bet Tech Intl Blacks Run, LTV Steel)**  
**Facility Address: 3468 Brodhead Rd**  
**Monoca, PA 15061**  
**Facility EPA ID #: PAD000805028**

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?
- If yes - check here and continue with #2 below.
- If no - re-evaluate existing data, or
- If data are not available, skip to #8 and enter "IN" (more information needed) status code.

**BACKGROUND** - The facility consists of a closed RCRA Hazardous Waste Landfill, designated the Secure Landfill, and a slag landfill, designated the Residual Waste Area.

- The Secure Landfill was closed with a RCRA cap and post-closure care under a PADEP Consent Order and post-closure plan.
- The slag in the Residual Waste Area is being mined and monitored under a PA Mining Permit.

Both landfill areas are monitored for potential releases to the groundwater and surface water.

**Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

**Definition of "Migration of Contaminated Groundwater Under Control" EI**

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

**Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

**Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Migration of Contaminated Groundwater Under Control  
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1. Is **groundwater** known or reasonably suspected to be “contaminated” above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.
- If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”
- If unknown - skip to #8 and enter “TN” status code.

**Rationale:**

Groundwater (8 wells) and surface water (4 locations) are monitored on a quarterly basis under the Pa Mining Permit (**Residual Waste Area**) and Consent Order (**Secure Landfill**).

Samples are analyzed for metals, facility specific VOCs, and indicator parameters.

- Groundwater data show no releases above drinking water screening standards, with the exception of slightly elevated lead concentrations.

- Lead concentrations averaged over the year are below the MCL (15 ppb) at each and every well.
- Lead concentrations averaged over all wells are below the MCL (15 ppb) for each and every quarter.
- These sporadic elevated levels at the perimeter of the landfill do not qualify as “contamination.”

**Reference:**

- Bet-Tech International 2014 Annual Groundwater Monitoring Report  
Blacks Run Secure Landfill, Trant Corp., 1/08/15
- Bet-Tech International Hazardous Waste Monitoring Report, 1<sup>st</sup> Quarter 2015, 4/29/2015
- Bet-Tech International Hazardous Waste Monitoring Report, 2<sup>nd</sup> Quarter 2015, 7/29/2015
- Beaver Valley Slag, - SMP 04000301, Blacks Run Mine 1<sup>st</sup> Quarter 2015 – Baseline Groundwater Analysis, 4/29/2015
- Beaver Valley Slag, - SMP 04000301, Blacks Run Mine 2<sup>nd</sup> Quarter 2015 – Baseline Groundwater Analysis, 7/29/2015
- Data evaluation memo, LTV/Bet-Tech, 2014 and 2015 (1<sup>st</sup>Q and 2<sup>nd</sup>Q), Maureen Essenthier, EPA RCRA Project Manager, September 25, 2015

**Footnotes:**

“Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).


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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the (insert facility and EPA ID #, located at (insert address)). Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

Completed by (signature)  Date 9/28/2015  
(print) Maureen Essenthier  
(title) RCRA Project Manager

Supervisor (signature)  Date 9-29-15  
(print) Paul Gotthold  
(title) Assoc Director, LCD  
(EPA Region or State) EPA Region 3

Locations where References may be found:

US EPA Region III  
Land and Chemicals Division  
1650 Arch Street  
Philadelphia, PA 19103

~~Virginia Department of Environmental Quality  
Office of Remediation Programs  
629 East Main Street  
Richmond, VA 23219~~

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