



Long-Term Stewardship Assessment Report

Constellium Rolled Products

EPA ID #: WVD009233297

Ravenswood, West Virginia 26164

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Introduction: Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

Site Background: Kaiser Aluminum and Chemical Company originally developed the site in Ravenswood, WV as an integrated aluminum production facility in the 1950's. In 1989, Ravenswood Aluminum Corporation purchased the entire Kaiser plant, except for two separate parcels (Spent Potliner Pile and Spent Potliner Vault).

Ravenswood Aluminum Corporation became Century Aluminum of West Virginia (CAWV or Facility) in 1997. CAWV sold the cast house and fabrication portion of the plant to Pechiney Rolled Products in 1999. Pechiney was bought by Alcan Rolled Products in 2003, which in turn was bought out by Constellium Rolled Products (Constellium or Facility) in 2011.

EPA issued a Final Decision and Response to Comments (FDRTC) for Constellium in November 2011.

The Corrective Measures Implementation Plan (CMIP) dated October 2013 was approved by EPA in November 2013.

Current Site Status: The EPA is the lead agency that provides oversight of RCRA Corrective Action activities at the Constellium site located in Ravenswood, West Virginia. Constellium is an active facility producing plate, sheet and coil aluminum rolled products.

Long-term Stewardship Site Visit:

On May 24, 2016, EPA conducted a long-term stewardship site visit with representatives from all three parties at the Ravenswood facility (TRC, Century Aluminum & Constellium) and contractors to discuss and assess the status of the implemented remedies at the site. The attendees were:

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Institutional Controls (ICs) Status: Institutional controls described in the FDRTC include: 1) restrict the use of groundwater for potable purposes; 2) restrict well drilling without prior EPA approval; 3) restrict use of property for any purpose other than industrial; 4) restrict earth moving activities.

Area 14 (Subsurface Debris Area) has a Materials Management Plan (Section 4 of the CMIP) to detail how soil and groundwater will be managed during any future subsurface activities. The CMIP includes a Health and Safety Plan, Sampling and Analysis Plan and Quality Assurance Project Plan.

Engineering Controls (ECs) Status: The FDRTC requires Constellium to operate, maintain, and monitor the existing security fence and security cameras around the entire parcel. EPA confirmed that the fence and cameras are in place.

Constellium is also required to follow the EPA approved groundwater monitoring plan. Monitored Natural Attenuation was selected as the remedy for groundwater in the FDRTC. This goal is to restore groundwater to drinking water standards. Until these standards are met, Constellium will monitor the natural attenuation process of contaminants in groundwater at the following well locations:

Well	Constituents	Frequency
MW-8s, MW-11	Arsenic	Annual

Financial Assurance: Financial Assurance is not required at the Facility

Reporting Requirements/Compliance: Operation and maintenance of existing engineering controls will include quarterly monitoring of the fences and gates, with maintenance preform as-needed. Annual progress reports must be submitted to EPA throughout the period that the Administrative Order on Consent is effective.

Mapping: The EPA Facility website figure is accurate and will include a geospatial PDF showing the use restriction boundaries. The geospatial PDF will be uploaded once the UECA is finalized with a legal survey of use restricted areas.

Follow- up Activities: Constellium is currently developing an Environmental Covenant (UECA) and expects to be finished within the next few months. UECA will be used as an enforcement mechanism to implement current ICs and maintain existing ECs.

Conclusion: The engineering controls selected are implemented and remain intact and undamaged. Also, no EC/IC deficiencies have been identified. The current EC/ICs have been implemented and are functional and maintained as required.

Attachments

Picture 1: Oil Pond



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