



Long-Term Stewardship Assessment Report

TRC Spent Cathode Storage Pile

EPA ID #: WVD988766127

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 Environmental Protection Agency (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: The TRC Spent Potliner (SPL) Pile was originally part of an integrated aluminum manufacturing facility which began operation in 1957 by Kaiser Aluminum. Between 1972 and 1980, spent potliner from the smelting process was stockpiled on concrete and clay pads, awaiting shipment for mineral recycling. An EPDM cover was installed in 1981 to isolate the material from the environment and to prevent contact with rainwater. Cyanide is the constituent of concern in soil whereas cyanide and fluoride are the constituents of concern in groundwater.

In 1989, Ravenswood Aluminum Corporation purchased the entire Kaiser Plant, except for two separate parcels (Spent Potliner Pile and Spent Potliner Vault), which Kaiser retained. TRC Environmental Corporation purchased the two parcels from Kaiser in 2004. The TRC Spent Potliner Vault is a RCRA permitted landfill which is being monitored and maintained by the West Virginia Department of the Environment under EPA ID No. WVD998900512.

EPA issued a Final Decision and Response to Comments (FDRTC) for the TRC Spent Potliner Pile in November 2011. A Consent Order between EPA and TRC was signed in August 2012 requiring implementation of the corrective measures set forth in the FDRTC. TRC submitted an Environmental Covenant (UECA) to West Virginia and EPA. The UECA was signed by West Virginia 09-24-12.

Current Site Status: The EPA is the lead agency that provides oversight of RCRA Corrective Action activities at the TRC Spent Potliner Pile site located in Ravenswood, West Virginia. The site is completely enclosed by a chain-link fence and is located wholly within an inactive industrial facility (Century Aluminum of West Virginia). Currently, work is being performed to install a new cover over the existing SPL Pile cover.

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:

Groundwater: The UECA recorded on September 24, 2012 restricts use of groundwater to remediation purposes only. Groundwater was not being used within the SPL boundary at the time of the site visit.

Land Use: The Spent Potliner Pile parcel is for industrial use only as described in the UECA. The SPL is unused and no residential structures have been constructed within Facility boundaries.

Excavation: The property within the SPL boundary cannot be developed in any way which could minimize the integrity and effectiveness of the EPDM cover. There were no signs of past or ongoing earth-moving activities in the area.

The Facility is in compliance with institutional controls specified in the UECA.

Engineering Controls (ECs) Status:

EPDM Cover: The original EPDM cover installed in 1981 was damaged by wildlife and weather. A new EPDM cover is currently being installed and is expected to be completed over the next few months. Also, damaged sections of fencing surrounding the SPL Pile have been replaced.

Financial Assurance: Financial Assurance is not required at the Facility.

Reporting Requirements/Compliance: Pursuant to the requirements under the UECA, TRC is required to submit an annual progress report. This year's report will summarize the completion of the replacement cover over the Pile, which is expected to be completed by June 2016.

Mapping: The EPA Facility website are accurate and include a geospatial PDF showing the use restriction boundaries (SPL Pile and Discolored Puddle Area). This map was field-verified and no issues were noted.

Follow-up Activities: TRC requested an extension for the 2016 Annual progress report. The progress report is now due July 29, 2016. The new EPDM Cover is expected to be completed this month.

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: New EPDM Cover

Picture 2: New EPDM Cover (2)

Picture 3: New EPDM Cover (3)

Picture 4: New EPDM Cover (4)



Picture 1: New EPDM Cover



Picture 2: New EPDM Cover (2)



Picture 3: New EPDM Cover (3)



Picture 4: New EPDM Cover (4)