



Long-Term Stewardship Inspection Report

Allegheny Ludlum

EPA ID#: PAD057629479

Latrobe, PA

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

The Allegheny Ludlum facility is approximately 80 acres and is located in Derry Township, Westmoreland County, Pennsylvania, north of the Latrobe City limits. The Facility manufactures high-speed tools and specialty steels. Finished products consist of molded ingots and pressed bars.

The Facility operates a slag disposal landfill under the Pennsylvania Department of Environmental Protection Agency (PADEP) solid waste disposal permit on the northernmost section of its property. Wastes disposed in the landfill include slag, furnace wastes, old mill flooring, scolls from the bottom of the furnaces, and scale. In recent years, the landfill has become a staging area where wastes generated from the manufacturing process are temporarily stored and eventually recycled into molded ingots of specific products. Ultimately, the Facility plans to remove and recycle the wastes and clean close the landfill.

As required under the permit, eight monitoring wells were installed upgradient and downgradient of the landfill to monitor the impact of the landfill to groundwater. The wells are sampled quarterly for heavy metals and constituents of concerns (COCs). The results are sent to PADEP for review. There have been no exceedances of EPA primary drinking water standards for heavy metals and the COCs in groundwater related to the landfill.

Current Site Status

The only aspect of RCRA corrective action at the site is the ongoing groundwater monitoring under the PADEP permit for the slag disposal landfill. The Facility will continue to monitor the groundwater wells in accordance to the PADEP permit. There have been no exceedances of EPA primary drinking water standards in groundwater from the landfill.

Long-term Stewardship Site Visit

On September 28, 2016, EPA conducted a long-term stewardship site visit with Allegheny Ludlum representatives and PADEP to discuss and assess the status of the implemented remedies at the site.

The attendees were:

Name	Organization	Phone No.
Khai M. Dao	USEPA	(215) 814-5467
John Hopkins	USEPA	(215) 814-3437
Diane McDaniel	PADEP	(412) 442-4153
Jeff Smith	PADEP	(412) 442-4159
Matt Shawley	PADEP	(724) 925-5431
Kathy Flaherty	PADEP	(412) 442-4066
Deborah L. Calderazzo	ATI	(724) 226-5947
Dan Lehman	ATI	(724) 226-5986
Brian Olesko	ATI	(412) 260-6210

The remedy implemented at the site includes engineering controls for the landfill. The status and specifics for the respective controls, and a summary of a variety of topics discussed during the meeting and field inspection are presented in the subsequent sections.

Engineering Controls (ECs)

Engineering controls (ECs) encompass a variety of engineered and constructed physical barriers (e.g., soil cap, subsurface venting systems, fences, groundwater pump and treat) to contain and/or prevent exposure to contamination.

ECs currently implemented at the site consists of groundwater monitoring only. The Facility will continue to monitor the groundwater in accordance to the PADEP permit.

Institutional Controls (ICs)

Institutional controls (ICs) are administrative or legal instruments (e.g., deed restrictions/notices, easements, covenants, zoning) that impose restrictions on the use of contaminated property or resources. ICs are also used to identify the presence of ECs and LTS requirements.

Currently, there are no ICs placed on the property. There are no impacts to groundwater at the Facility. The land is currently designated for industrial use under the local ordinance. Any proposed changes in land use beyond the current designated use will require the approval of PADEP and EPA, and must meet the required cleanup standards for the specific land use.

Financial Assurance:

Given the minimal cost in implementing groundwater monitoring at the Facility, financial assurance is not required.

Field Inspections:

EPA, PADEP, and Allegheny Ludlum representatives conducted a field inspection of the site. The areas of the field inspection included the slag disposal landfill and observations of some of the monitoring wells. The Allegheny Ludlum representatives also provided a brief tour of the manufacturing areas.

The Facility continues to be in compliance with the PADEP solid waste disposal permit for the landfill. Groundwater monitoring is conducted quarterly and is submitted to PADEP. There have been no exceedances of EPA primary drinking water standards in groundwater. Given that groundwater monitoring is currently the only RCRA corrective action requirement at the Facility, EPA discussed with the Facility the proposal of issuing a “No Further Action with Controls” decision with the requirement that the Facility continues to be in compliance with the PADEP landfill permit.

Follow-up Activities:

EPA will submit a proposal of “No Further Action with Controls” decision with the requirement that the Facility continues to be in compliance with the PADEP landfill permit. The proposal decision will go through a public comment period before it’s finalized.

Conclusion:

EPA concludes that the current groundwater monitoring is effective in meeting the objectives of protection of human health and the environment. There have been no exceedances of EPA primary drinking water standards for heavy metals and the COCs in groundwater associated with the landfill.