



STATEMENT OF BASIS

Allegheny Ludlum Corp
(former Teledyne Vasco Co.)
242 Allvac Lane
Latrobe, PA 15650

EPA ID NO. PAD057629479

Prepared by
Office of Remediation
Land and Chemicals Division
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List of Acronyms

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| AR | Administrative Record |
| COCs | Constituents of Concern |
| EI | Environmental Indicator |
| FDRTC | Final Decision and Response to Comments |
| EPA | Environmental Protection Agency |
| GPRA | Government Performance and Results Act |
| HSWA | Hazardous and Solid Waste Amendments |
| PADEP | Pennsylvania Department of Environmental Protection |
| RCRA | Resource Conservation and Recovery Act |
| SB | Statement of Basis |
| USACE | United States Army Corps of Engineers |

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Allegheny Ludlum Corp. (Allegheny) facility located at 242 Allvac Lane, Latrobe, PA 15650 (Facility or Site). This SB highlights key information relied upon by EPA in making its proposed decision of Corrective Action Complete with Controls, which comprise of the Pennsylvania Department of Environmental Protection (PADEP) Residual Waste Operating Permit for the operation of the onsite residual landfill and the local ordinance that restricts the property for industrial use.

EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. EPA's proposed decision is that no further investigation or cleanup is required. The Facility currently operates a residual waste landfill under the Residual Waste Operating Permit No. 301287 issued by the PADEP for the disposal of residual wastes generated from the manufacturing processes. PADEP will continue to oversee the management and operations of the residual landfill. The Facility is restricted to industrial use under the local land use zoning ordinance. EPA has determined that its proposed decision of Corrective Action Complete with Controls is protective of human health and the environment and that no further corrective action is necessary at this time.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section 5, Public Participation, for information on how you may review the AR.

Section 2: Facility 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 was formerly known as the Teledyne Vasco Company until the late 1990's when Allegheny Ludlum purchased the property. The Facility manufactures specialty steels. Finished manufactured products consist of molded ingots and pressed bars. A layout of the Facility is presented in Figure 1.

The Facility is a large quantity hazardous wastes generator and does not treat, store or dispose of hazardous wastes. Hazardous wastes are shipped offsite for proper disposal. Allegheny operates

a slag disposal landfill under the 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 intends to remove and recycle all the wastes and clean close the landfill.

As required under the PADEP 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 the EPA primary drinking water standards for the COCs in groundwater related to the landfill.

Section 3: Summary of Environmental History

As part of the Environmental Indicator (EI) inspection and evaluation for Current Human Exposures and Migration of Contaminated Groundwater, a comprehensive record search and review were conducted by EPA and its contractor, the United States Army Corps of Engineers (USACE). This undertaking consisted of evaluating the Facility's manufacturing operations and waste management practices, RCRA permit applications, historical spills and releases, documentation of previous site inspections, RCRA closure activities and correspondence between the EPA, PADEP, and the Facility.

On August 13, 1999, EPA, PADEP and the USACE conducted an EI site visit. The visit consisted of a plant tour and information gathering to assess the status of the Facility. No obvious areas of concern were identified during the visit. Based on the site visit and the comprehensive file review, there appears to be no indications of significant spills or releases that have adversely impacted soil, groundwater, surface water, or air that would lead to harmful impacts to human health or the environment.

On September 28, 2016, EPA conducted a long-term stewardship site visit with the PADEP and Allegheny representatives to discuss and assess the status of the Facility. The visit consisted of a field inspection that included the slag disposal landfill, observations of some of the groundwater monitoring wells and a tour of the manufacturing areas. No obvious areas of concern were identified during the visit. The Facility will continue to monitor the groundwater wells for the COCs under the PADEP residual waste operating permit. There have been no exceedances of the EPA primary drinking water standards in groundwater from the landfill.

Section 4: Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. EPA has determined that the Facility met these indicators (i.e., there is no

contamination problem that creates an unacceptable risk to human health nor is there any evidence of adverse groundwater contamination impact to the environment) on August 30, 2001.

Section 5: Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Khai Dao
Phone: (215) 814-5467
Fax: (215) 814-3113
Email: dao.khai@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that the notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Mr. Khai Dao. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Khai Dao.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Mr. Khai Dao at the address listed above.

11.14.16
Date



John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III

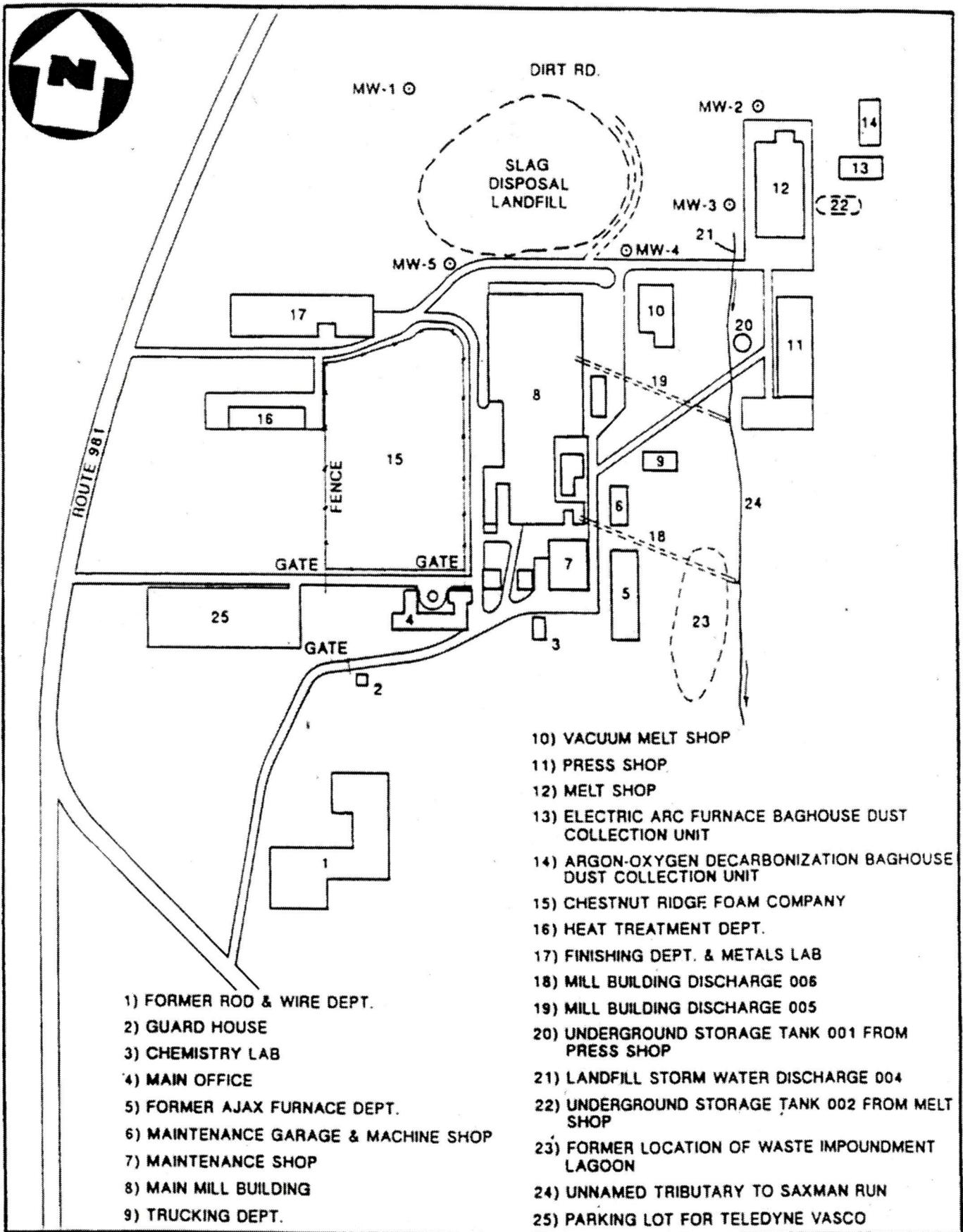
Index to Administrative Record

Long-term Stewardship Inspection Report, Allegheny Ludlum, Latrobe, Pennsylvania 15650, prepared by the United States Environmental Protection Agency, October 2016.

Final Environmental Indicator Inspection Report, Teledyne Allvac, Latrobe, Pennsylvania 15650, prepared by the United States Army Corps of Engineers, December 2000.

Environmental Priorities Initiative Preliminary Assessment, Teledyne Vasco, Latrobe, Pennsylvania 15650, prepared by the NUS Corporation, January 1991.

Attachment A



SITE SKETCH
TELEDYNE VASCO, LATROBE, PA
 (NO SCALE)

Figure 1

