



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER EDGEWATER STEEL PROPERTY
EDGEWATER PROPERTIES, L.P
PARCEL B - EDGEWATER AT OAKMONT

300 COLLEGE AVENUE
OAKMONT, PENNSYLVANIA

EPA ID NO. PAD 074 966 789

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
August 2017

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List of Acronyms

AST	Above Ground Storage Tank
EPA	Environmental Protection Agency
GPRA	Government Performance and Results Act
mg/kg	milligram per kilogram
ug/l	microgram per liter
MSC	PA Act 2 Medium Specific Concentration
PADEP	Pennsylvania Department of Environmental Protection
PAH	Polynuclear Aromatic Hydrocarbon
PCBs	Polychlorinated Biphenyls
RCRA	Resource Conservation and Recovery Act
SVOCs	Semi-Volatile Organic Compounds
VOCs	Volatile Organic Compound

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis to solicit public comment on its proposed remedy for the former Edgewater Steel Property, Edgewater Properties L.P, Parcel B - Edgewater at Oakmont (hereafter referred to as Facility or Parcel B) in Oakmont, Pennsylvania. The Facility is subject to the corrective action provisions of the Resource Conservation and Recovery Act (RCRA).

EPA is proposing that the Pennsylvania Department of Environmental Protection (PADEP) approvals of investigation and cleanup measures completed at the Facility are protective of human health and the environment, and that no further action is necessary.

EPA's proposed remedy for the Facility consists of compliance with and maintenance of groundwater and land use restrictions. These restrictions have been implemented and will be enforced by PADEP. This Statement of Basis highlights key information relied upon by EPA in proposing its remedy for the Facility.

The Facility is subject to EPA's Corrective Action program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 *et seq.* The Corrective Action program requires that owners and/or operators of facilities subject to certain provisions of RCRA investigate and address releases of hazardous waste and hazardous constituents, usually in the form of soil or groundwater contamination, that have occurred at or from 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.

EPA is providing a thirty (30)-day public comment period on this Statement of Basis. EPA may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (Final Decision) after the public comment period has ended.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating to <https://www.epa.gov/hwcorrectiveactionsites>.

The Administrative Record for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 8, Public Participation, below, for information on how you may review the Administrative Record.

Section 2: Facility Background

Parcel B - Edgewater at Oakmont is part of the 57-acre former Edgewater Steel Property that was owned and operated by Edgewater Steel Company from 1916 until its last bankruptcy in 2002. It is located along the Allegheny River in Oakmont, Allegheny County, Pennsylvania. (Figure 1 – Facility Location Map)

The property is now divided into the following two areas.

- Edgewater at Oakmont – This 34-acre area (Parcel B) is the northern half of the property. It is the subject of this Statement of Basis.
- River's Edge of Oakmont – This 23-acre area (Parcel A and Parcel C) is the southern half of the property.

Steelmaking operations at the former Edgewater Steel Property included forging, machining, melting, quenching and fabricating steel railroad wheels and rolled circular rings.

Edgewater Steel Company operated a storage/disposal pile on former Edgewater Steel Property to manage electric arc furnace dust. This unit operated under RCRA interim status, thus the entire property became subject to the corrective action provisions of RCRA.

A map of the entire former Edgewater Steel Property delineating these parcels is included as Figure 2 – Property Parcels. EPA has prepared two Statements of Basis; one for Edgewater at Oakmont (Parcel B) and one for River's Edge of Oakmont (Parcels A and C). Together, these two documents represent EPA's proposed remedy for the total 57-acre former Edgewater Steel Property.

In 2002, Parcel B was acquired by the Regional Industrial Development Corporation (RIDC), a Pittsburgh area non-profit corporation created to foster economic diversity and redevelopment. RIDC completed a remedial investigation and cleanup of Parcel B under Pennsylvania's Act 2 program (Act 2). The cleanup included tank and drum removal, soil capping, and certain use restrictions. PADEP approved the Final Report for Parcel B in February 2016.

Parcel B, now referred to as Edgewater at Oakmont, was acquired for development by Edgewater Properties, L.P. in 2009. Development is nearly complete; ultimately comprising 242 residential units, including townhomes, multi-family and single family homes. A small area in the northwest corner of Parcel B includes an electrical substation owned by Duquesne Power and Light (referred to in several drawings and reports as Parcel B-1).

Parcel A and Parcel C, now referred to as River's Edge of Oakmont, were acquired for redevelopment in 2005 by Brooks and Blair Waterfront Properties, Ltd. Parcel C includes a completed apartment building. The development plan for Parcel A includes apartments, condominiums, and single-family residences. These housing units will be constructed in multiple phases.

Brooks and Blair completed an Act 2 investigation of Parcels A and C, and received PADEP approval of a Final Report in March of 2016. Corrective measures include soil capping and restriction on excavation and groundwater use.

Parcel B - Edgewater at Oakmont

The subsurface of much of the Facility consists of historic fill that was placed to raise the land surface above the Allegheny River floodplain. The fill was placed prior to construction of the steel plant. The 20 mill buildings that housed the steel making processes were located on Parcel B. Edgewater Steel Company also operated an electric arc furnace (EAF) on Parcel B, to produce carbon and low-alloy steel, from 1964 to 1985. EAF dust is a regulated hazardous waste under the RCRA program. Operations at the former Edgewater Steel Property ceased in 2002.

Section 3: Environmental Assessment and Completed Actions

EPA has reviewed the environmental investigations completed by the respective developers and contained in the Final Reports submitted to the Act 2 program. These investigations and subsequent reports followed guidelines laid out in the Act 2 Technical Guidance and were approved by PADEP. To remain consistent with the language in the investigation reports, this document refers to the Medium Specific Standards (MSCs) screening levels. MSCs are the chemical-specific screening levels for the Pennsylvania Statewide Health Standards under the Act 2 program. MSCs are established in a Technical Guidance manual and are consistent with EPA risk-based standards for the specific contaminants found at the Facility. EPA reviewed all data generated and concurs with PADEP's approval of both investigations.

Remedial Activities Completed

Site remediation was completed prior to and during the environmental investigations of the Facility. Starting in 2002, oils from aboveground storage tanks and approximately 300 drums of various production liquids were sent offsite for disposal or recycling. Four (4) aboveground oil storage tanks (ASTs) were removed and the concrete pit where the tanks were located was filled. The processing equipment was removed and all the buildings, except a transformer building, were demolished by 2005. The concrete floors and machinery pads of the buildings were left in place. In 2006, RIDC submitted the required closure information for the ASTs.

Environmental Investigations

RIDC conducted a multi-phase investigation of Parcel B, which was impacted by the Edgewater steel-making activities and product storage. An environmental site assessment was completed in July 2003. Additional sampling work, as well as some tank removals, followed over the next 4 years. Investigation work included multiple rounds of surface soil, subsurface soil, and groundwater sampling. Ultimately, a Final Report was submitted to PADEP in November 2014. PADEP approved the Final Report in February 2015.

Soil and groundwater samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, cyanide, and polychlorinated biphenyls (PCBs). Sample locations are identified on Figure 3 – Sampling Location Map.

Soil Investigation

Surface and subsurface soil samples were collected from 37 borings across the Facility. A total of 48 soil samples were analyzed. The sample locations were selected to evaluate: areas most likely contaminated based on prior operations at the site, historical fill material beneath the property, and several random locations throughout the Facility.

The analytical results of the soil samples were screened against the Act 2 MSC screening standards for residential direct contact (the most protective soil screening standard). Concentrations that exceeded the screening standards are presented in Table 1. The data showed:

- VOCs – Only a few samples contained detectable levels of any VOCs. No VOCs were detected above the screening standards.
- SVOCs – Three samples contained compounds above the MSC screening standards. One sample, SB-12, contained four (4) polynuclear aromatic hydrocarbon (PAH) compounds that ranged from 2 to 12 times the screening standard. Two other samples contained one compound, Benzo(a)pyrene, at concentrations slightly above the screening standard.
- Metals – Several samples contained concentrations of metals above the screening standard:
 - Arsenic – Six samples contained concentrations slightly above the screening standard.
 - Copper – One sample, SS-2 (located on Parcel B-1), contained a copper concentration of 172,000 milligrams/kilograms (mg/kg), significantly above the screening standard of 8,100 mg/kg. All other samples were well below the screening level, ranging from below detection to 187 mg/kg.
 - Lead – Five samples exceeded the screening level of 500 mg/kg. Four of the samples were from Parcel B-1
 - Manganese – Two samples exceeded the screening level, containing concentrations about twice the screening level.
- Cyanide – No samples contained concentrations above the screening standard.
- PCBs – No samples contained detectable concentrations of PCBs.

Table 1: Soil samples exceeding Act 2 Soil MCSs for Residential Direct Contact Exposure

Constituent	MSC for Residential Direct Contact mg/kg	Number of samples exceeding MSC	Sample Location	Concentration mg/kg
Benzo(a)pyrene	0.58	3	SB-5	0.65
			SB-12	7.2
			SB-20	1.0
Benzo(b)fluoranthene	3.5	1	SB-12	6.5
Benzo(k)fluoranthene	4.0	1	SB-12	8.0
Dibenzo(a,h)anthracene	1.0	1	SB-12	2.6
Arsenic	12	6	SB-26, SB-26, SB-27, KU-A, KU-B, KU-C	Up to 18
Copper	8,100	1	SS-2	172,000
Lead	500	1	SB-14, CECSS-1, CECSS-2, CECSS-3, CECSS-4	580 to 1,700
Manganese	10,000	2	SB-15	21,000
			SB-18	19,100

mg/kg: milligrams per kilograms

Groundwater Investigation

The groundwater exists within the historic fill areas and a clayey/sandy silt zone 20 to 30 feet below the ground surface. Depth to groundwater is 24 feet (or greater) below the ground surface. The groundwater flow from the Facility directly discharges to the Allegheny River (to the west). The fill material is not leaching hazardous constituents based on test results submitted as part of the facility investigations.

Groundwater sampling took place between 2003 and 2006 throughout Parcel B. Nine (9) groundwater monitoring wells were installed to assess the groundwater quality beneath the Facility and potential contaminant discharge to the Allegheny River.

The analytical results of the groundwater samples were screened against the Act 2 MSC screening standards for a used aquifer (the most protective groundwater screening standard), although the aquifer is not used and institutional controls are in place to prevent future use. Concentrations that exceeded the screening standards are presented in Table 2. The data showed:

- VOCs – Only two compounds were detected, trichloroethylene (TCE) and tetrachloroethylene (PCE). TCE was found in 4 wells, at concentrations ranging from 6 to 120 micrograms/liter (ug/l), compared to the screening level of 5 ug/l. PCE was detected in only one well, at a concentration slightly above the screening level of 5 ug/l.
- SVOCs – No samples contained detectable concentrations of SVOCs.
- Metals – Several samples contained concentrations of metals above the screening standard:
 - Concentrations of antimony, cadmium, lead, and manganese exceeded screening standards at most well locations.
 - Nickle and mercury exceeded the screening standards in MW-1.
- Cyanide – One sample, MW-5, contained 690 ug/l, above the screening level of 200 ug/l. Cyanide concentrations in the other groundwater samples ranged from non-detect to 137 ug/l.
- PCBs – No samples contained detectable concentrations of PCBs.

Table 2: Groundwater samples exceeding the Act 2 Soil MCSs for Used Aquifers

Constituent	MSC for Used Aquifer ug/l	Number of locations exceeding MSC	Sample Location	Concentration ug/l
TCE	5	4	MW-1	120
			MW-2	120
			MW-7	6
			CEC-01	51
PCE	5	1	MW-2	8.3
Antimony	6	6	MW-1, 2, 3, 4, 5, 6	8 to 15
Cadmium	5	5	MW-2, 3, 4, 5, 6	10 to 20
Lead	5	6	MW-1, 2, 3, 4, 5, 6	40 to 110
Manganese	300	1	MW-1, 2, 3, 4, 5, 6	350 to 6,240
Nickle	100	1	MW-1	160
Mercury	2	1	MW-1	10

ug/l: micrograms per liter

The Act 2 MSC screening standards for a non-use aquifer were not exceeded in any groundwater sample. As noted, groundwater use at the Facility is not permitted. Non-use aquifer screening standards are 1,000 times the used aquifer screening standard.

Risk Assessment

Potential exposure pathways were evaluated in the Risk Assessment Report and Cleanup Plan, May 2007/revised August 2007. The assessment evaluated potential exposure pathways under current and planned future use of the Facility. The exposure evaluation included pathway elimination, where appropriate, based on the engineering and institutional controls proposed in the redevelopment Cleanup Plan. The provisions of the Cleanup Plan are described in the Facility Redevelopment / Cleanup Plan section (below).

Groundwater Exposure

- There are no current or future users of the groundwater.
- Depth to groundwater is 24 feet or greater, preventing exposure to construction or utility workers.

Vapor Intrusion to Indoor Air

- Both soil and groundwater contaminants were screened for potential migration to indoor air.
- TCE, PCE, cyanide and mercury were evaluated as constituents of concern.
- No health risks were predicted, based on the concentrations of contaminants and the depth to contamination (20 feet or greater below ground surface).

Direct Contact to Soil

- Exposure was evaluated for all pathways (ingestion, dermal contact, etc.) for residential use scenario.
- Exposures were evaluated for direct contact by a child, adult, utility worker, or construction worker.
- Calculated risks were below levels of concern.

Groundwater to Surface Water

- Groundwater to surface water modeling evaluated the concentrations of constituents discharging to the Allegheny River.
- Estimated in-stream concentrations were below the surface water quality criteria for aquatic life and human health.

The risk assessment demonstrated that planned engineering and institutional controls would result in safe and protective conditions under the planned residential redevelopment. The evaluation demonstrates that there are no exposure pathways of concern.

The Risk Assessment Report and Cleanup Plan proposed redevelopment of the Facility for residential use. PADEP approved the Risk Assessment Report and Cleanup Plan on August 17, 2007, with the qualification that Parcel B-1 is approved only for non-residential use.

Facility Redevelopment / Cleanup Plan

The Final Report, Site Specific Standards, Former Edgewater Steel Property (Final Report), November 2014/revised February 2015, summarizes the environmental investigations and attainment of cleanup standards, and proposes measures for redevelopment of the property.

The Final Report presents details of engineering and institutional controls that will address potential exposure to site workers and residents, under the proposed residential redevelopment of the Facility.

1. The entire property will be capping with buildings, pavement, and/or clean soil.
2. An Environmental Management Plan details procedures that will be followed during property soil management activities, such as excavation and grading.
3. Groundwater use for potable or agricultural purposes will be prohibited through deed restrictions.
4. Excavation through the cap will be restricted through deed restrictions.
5. The deed notification requirements documenting the groundwater use restrictions and the requirements of the soil management plan will be implemented under the provisions of the Act 2 program.

PADEP approved the Final Report on February 11, 2015. All of the engineering and institutional controls are being implemented as redevelopment of the Facility progresses.

Environmental Indicators

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental cleanup indicators for each facility: (1) Current Human Exposures Under Control, and (2) Migration of Contaminated Groundwater Under Control. The Facility met both of these indicators in September 2003.

Section 4: Corrective Action Objectives

EPA's Corrective Action Objectives for the specific environmental media at the Facility are the following:

Soils - The Corrective Action Objective is to prevent direct contact exposure to soil contamination above residential direct contact screening standards. Consequently, the soil-capping requirement should be maintained.

Groundwater - The groundwater beneath Parcel B exceeds drinking water screening standards. Consequently, the groundwater throughout the Facility should not be used for use as a potable water source.

Section 5: Proposed Remedy

EPA's proposed decision requires the compliance with and maintenance of soil and groundwater use restrictions implemented by PADEP.

Soils

EPA's proposed remedy for soils is to maintain land use restrictions to prevent exposure above the MSCs in soils. The land use restrictions include:

- maintenance of the protective soil caps, pavement caps, and/or structures overlying the contaminated soils; and
- compliance with the PADEP-approved Environmental Management Plan prior to conducting any excavation at the Facility.

These restrictions have already been implemented at the Facility pursuant to Act 2. Each property deed requires owners to maintain "soil caps, fill cover, pavement caps, and/or structures overlying contaminated soils on the Property and does not allow any excavations of an approved cap without adherence to the Environmental Management Plan on file with PADEP." These requirements run with the land and cannot be modified without PADEP approval.

Groundwater

EPA's proposed remedy for groundwater is to maintain groundwater use restrictions to prevent exposure to contaminants. These restrictions have already been implemented at the Facility pursuant to Act 2. Each property deed contains conditions and restrictions that prohibit potable or agricultural use of groundwater. These requirements run with the land and cannot be modified without PADEP approval.

Section 6: Evaluation of Proposed Remedy

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance.

Threshold Criteria	Evaluation
1) Protect human health and the environment	EPA is proposing that PADEP-approved use restrictions and soil management requirements will protect residents and workers from unacceptable risk due to contaminants remaining in the groundwater and soil.
2) Achieve media cleanup objectives	Investigation results at the Facility indicated that contamination was detected above PADEP Act 2 residential MSCs. The PADEP-approved cleanup plan will be protective for residential use by eliminating exposure to contaminated soils through a combination of soil capping, maintenance and use restrictions.
3) Remediating the Source of Releases	<p>In all proposed remedies, EPA seeks to eliminate or reduce further releases of hazardous wastes and hazardous constituents that may pose a threat to human health and the environment. The Facility met this objective.</p> <p>Source control actions have removed waste material and some contaminated soil, and established caps for other areas.</p>

Balancing Criteria	Evaluation
4) Long-term effectiveness	The long term effectiveness of the proposed remedy for the Facility will be maintained by compliance with use restrictions by the current and all subsequent property owners bound by the controls.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	Reduction has already been achieved, as demonstrated by the data from the groundwater monitoring and soil sampling results.
6) Short-term effectiveness	EPA's proposed remedy does not involve any activities, such as construction or excavation that would pose short-term risks to workers, residents, and the environment.
7) Implementability	The use restrictions proposed in this Statement of Basis have already been implemented by PADEP. PADEP can enforce these restrictions under Pennsylvania law if necessary.

8) Cost	The costs associated with this proposed remedy are minimal (estimated cost of less than \$1000 per year).
9) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy during the public comment period, and it will be described in the Final Decision and Response to Comments.
10) State/Support Agency Acceptance	PADEP has approved the proposed remedy for the Facility under the Act 2 Program.

Section 7: Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. EPA is proposing that no financial assurance be required.

Section 8: Public Participation

You are invited to comment on EPA's proposed remedy. The public comment period will last thirty (30)-calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, email, or phone to Maureen Essenthier at the address listed below.

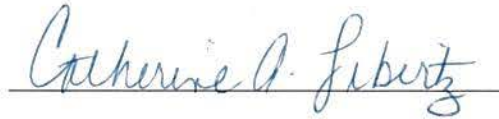
EPA may hold a public meeting upon request. Requests for a public meeting should be made to Ms. Essenthier at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all information considered by EPA for the proposed remedy. It is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Maureen Essenthier (31.C20)
Phone: (215) 814-3416
Email: essenthier.maureen@epa.gov

Section 9: Signature

Date: 8-24-17

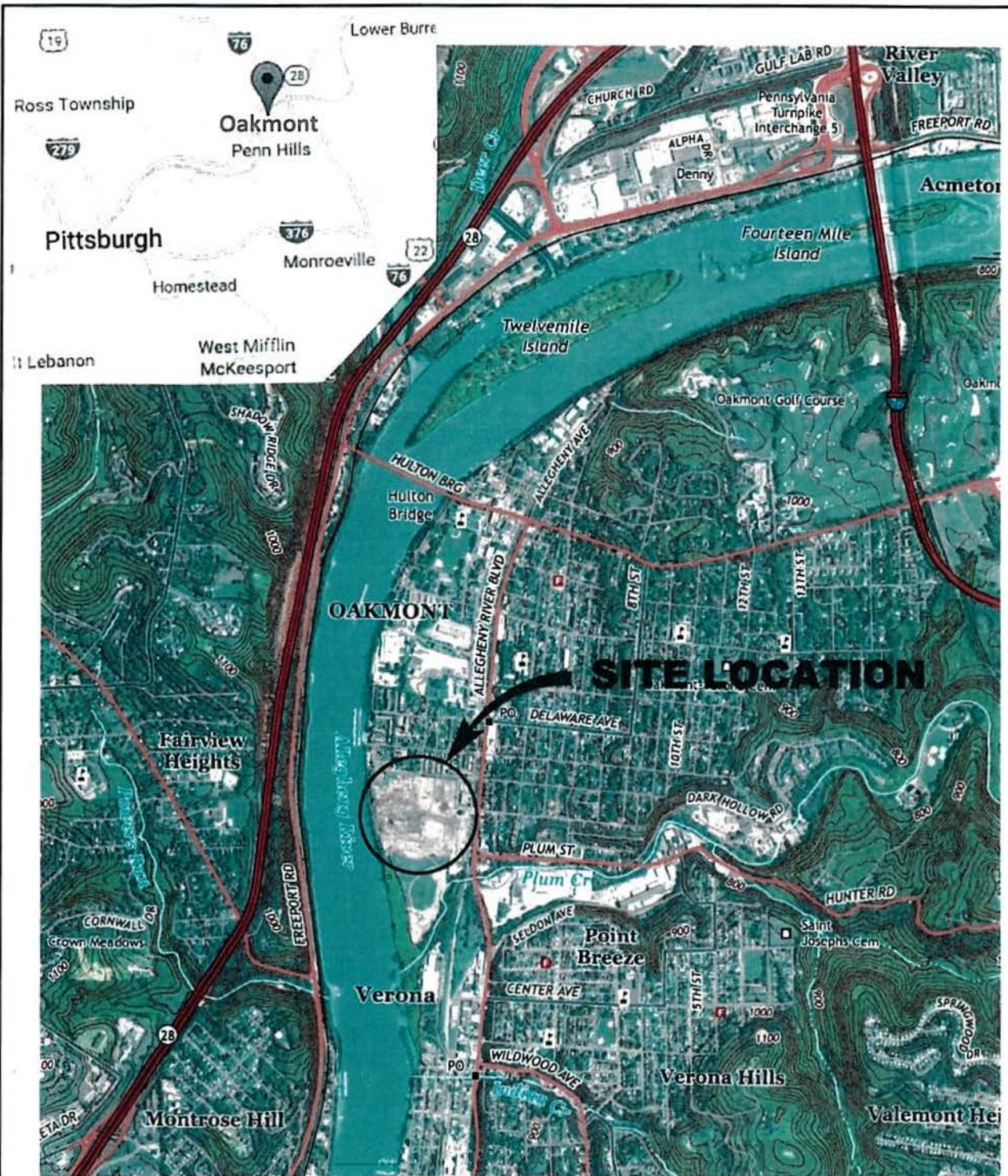
A handwritten signature in blue ink, reading "Catherine A. Libertz", written over a horizontal line.

Catherine A. Libertz, Acting Director
Land and Chemicals Division
US EPA, Region III

Section 9: Index to Administrative Record

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2/11/2015
3. Former Edgewater Steel Property, Final Report, Site-Specific Standard
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4. Former Edgewater Steel Property, Risk Assessment Report/Cleanup Plan
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5. Former Edgewater Steel Property, Remedial Investigation Report
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6. Former Edgewater Steel Property, Parcel B-1, Workplan for Material Excavation
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7. Former Edgewater Steel Property, Aboveground Storage Tank Closure, Letter Report
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8. Former Edgewater Steel Property, Supplemental Sampling and Analysis Summary
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10. Former Edgewater Steel Property, Response to Comments
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11. Parcel B-1 of the Former Edgewater Steel Property, Report of Findings, Phase II
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C&EC Consultants for Duquesne Light Company, 3/30/2005
12. Former Edgewater Steel Property, Remedial Investigation, Baseline Risk Assessment,
Cleanup Plan, Site-Specific Standard
KU Resources Inc., for Regional Industrial Development Corporation, July 2004
13. Former Edgewater Steel Property, Work Plan

KU Resources Inc., for Regional Industrial Development Corporation, July 2003



REFERENCE:
USGS 7.5-MIN TOPOGRAPHIC
QUADRANGLE NEW KENSINGTON WEST,
PENNSYLVANIA, DATED 2013.

SCALE - FEET
0 2000

REVISION	DATE	DESCRIPTION
APPROVED	-	
CHECKED	-	
DRAWN	RAM 11/06/2014	
CAD FILE NO.	14384A001	
PROJECT NO.	EP14384ESP	



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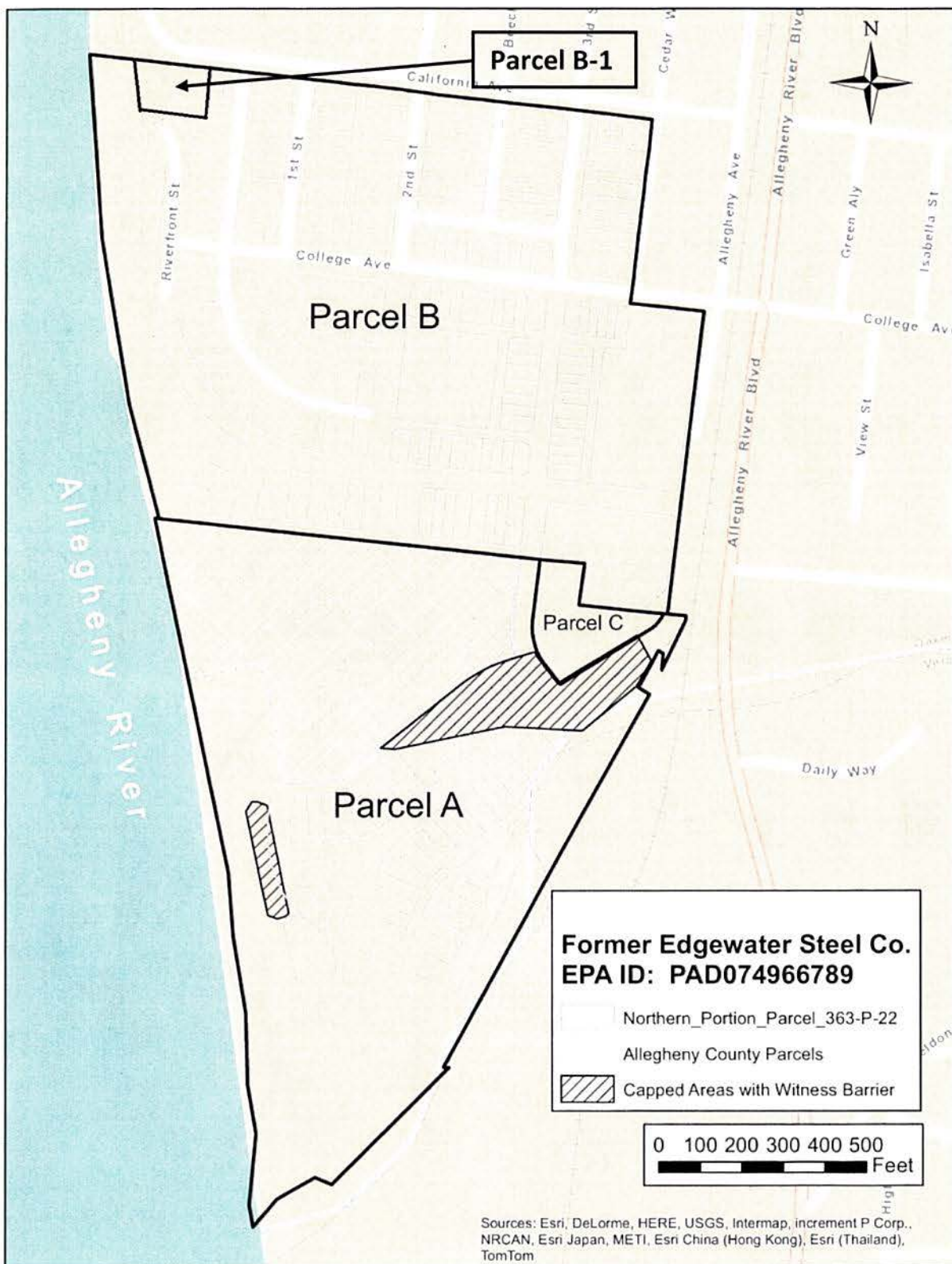
PROPERTY LOCATION MAP FORMER EDGEWATER STEEL PROPERTY

BOROUGH OF OAKMONT
ALLEGHENY COUNTY, PENNSYLVANIA

PREPARED FOR
EDGEWATER PROPERTIES, L.P.
MURRYSVILLE, PENNSYLVANIA

FORMER EDGEWATER STEEL PROPERTY
Statement of Basis

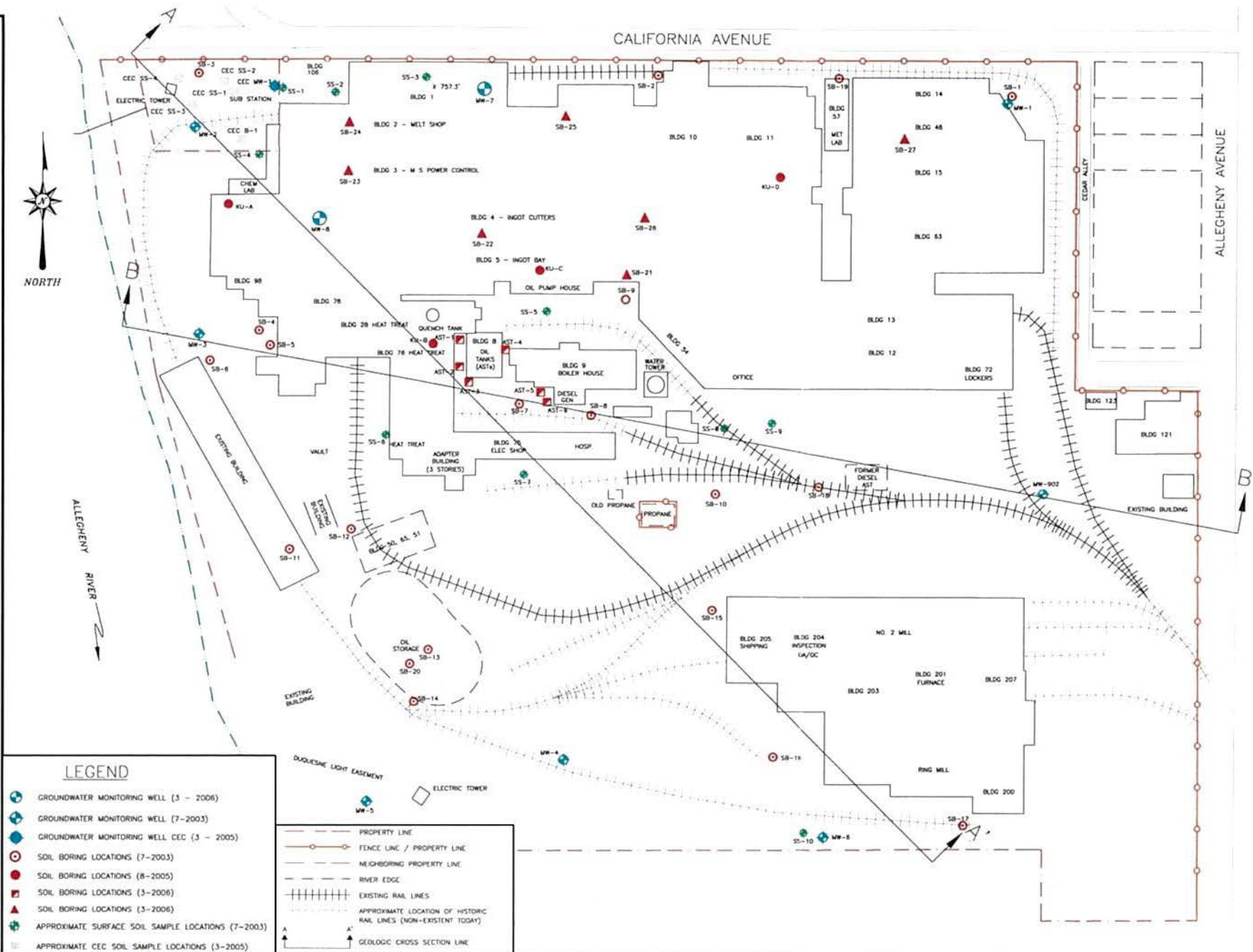
Facility Location Map
Figure 1



FORMER EDGEWATER STEEL PROPERTY
Statement of Basis

Property Parcels
Figure 2

**FORMER Edgewater Steel Property
Parcel B – Edgewater at Oakmont
Statement of basis**



**Sampling Location Map
Figure 3**

PREPARED BY:
KU Resources, Inc.
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PREPARED FOR:
**EDGEWATER PROPERTIES L.P.
MURRYSVILLE, PENNSYLVANIA**

PROJECT:
**FORMER EDGEWATER STEEL PROPERTY
BOROUGH OF EDGEWATER
ALLEGHENY COUNTY, PENNSYLVANIA**

DRAWING TITLE:
SAMPLE LOCATIONS MAP

