DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
Interim Final 2/5/99
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
Current Human Exposures Under Control

Facility Name: PTC Alliance Corporation (Formerly Pittsburgh Tube Company)
Facility Address: 533 Industrial Park Road, Jane Lew, West Virginia
Facility EPA ID #: WVD060692126

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   ☒ If yes - check here and continue with #2 below.

   ☐ If no - re-evaluate existing data, or

   ☐ if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

The Facility is located at 533 Industrial Park Road, Jane Lew, Lewis County, West Virginia. The 10.9 acre facility is bordered by Composite Pool Corporation to the North, Hackers Creek to the South East, County Route 7/8 to the West, and World Wide Equipment/Kenworth to the South.

PTC Alliance - Jane Lew Division was built in 1974 as part of the Pittsburgh Tube Company and began its operations in 1976. In 2001, Pittsburgh Tube Company merged with Alliance Midwest Tubular Products and formed PTC Alliance. The Facility is currently idle.

During operation, the Facility would receive steel tubes from other PTC Alliance facilities and then use that material as feedstock to produce drawn over mandrel (DOM) tubes. During the DOM process, surface preparation, pointing, cold drawing, annealing and finishing operations would be performed. After the DOM process, the tubes would go through finishing operations based on individual customer specifications.

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater		X		
Air (indoors)[2]		X		
Surface Soil (e.g., <2 ft)		X		
Surface Water		X		
Sediment		X		
Subsurf. Soil (e.g., >2 ft)		X		
Air (outdoors)		X		

☒ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

☐ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

☐ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

There are no longer any Solid Waste Management Units (SWMUs) associated with PTC Alliance – Jane Lew Division (formerly Pittsburgh Tube Company). PTC Alliance (Facility) used three lined surface impoundments to dispose of K062 (spent pickle liquor). From 1976 to 1984, the Facility used three surface impoundments for the settling of solids from the neutralized waste streams. The three impoundments were 100' by 75' by 6' deep, hypalon-lined, ponds with had an operating capacity of 117,000 gallons. During operation, treated effluent from the lift station, including injected coagulation aid polymer, were discharged into the first pond and retained for ten days where the bulk of the solids settled out. The effluent would then flow through cross over pipes into the second pond and retained for approximately ten days. These procedures would be repeated in the third pond. The total retention and settling time from start to finish was about thirty days. The supernatant would then flow into the wet well tank and then discharged by pumping into the Jane Lew Municipal sewage treatment system or circulated for reuse. The settled out solids would then be periodically removed and disposed of by an outside contractor.

The impoundments were closed under an interim status closure plan in 1987 and certified closed in March 1988. In September 1988, the Facility was issued a permit to operate four hazardous waste storage and treatment units, to conduct a five-year post-closure care, and to conduct groundwater monitoring at the closed impoundment.

In 1994, the four tanks used for hazardous waste storage, as permitted by the Facility's 1988 Part B Permit, were emptied and decontaminated. Two of the tanks, the Continuous Treatment Tank and the Lift Tank were subsequently taken out of service. The other two tanks were returned to service. The Batch Tank would now be part of a non-hazardous wastewater treatment system and the Haulaway Tank would now be used as a 90-day accumulation tank for hazardous waste. The changes to the hazardous waste tank storage units, including the tank closure report, were incorporated into a June 1995 Class 2 Permit Modification.

In a memo to the file on June 17, 1999, Permitting Program Manager G.S. Atwal stated that Pittsburgh Tube Company had "complied with the groundwater requirements as required by the Facility's Part B Permit issued on September 08, 1988". After a review of the groundwater monitoring data and subsequent statistical analysis of the data

submitted by the Facility, the Hazardous Waste Permitting Unit concluded in an interoffice memo dated August 19, 2009 that, "based on the relatively low concentration of hazardous metals constituents and the low solubility of the precipitated metal hydroxides in the sludges that may have remained after the 1987 interim status closure, the Facility poses very little threat to human health and the environment and there is no need for future corrective action". Assistant Chief H. Michael Dorsey then issued Pittsburgh Tube Company a letter on September 29, 1999 stating that the "Office of Waste Management no longer considers the Jane Lew, West Virginia facility to be subject to the permitting or post-closure requirements of *40 CFR Parts 264 or 265* and, therefore, groundwater monitoring activities for those purpose are no longer necessary".

Footnotes:

[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

☐ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

☐ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

☐ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

☐ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

☐ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

☐ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

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5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

☐ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

☐ If no - (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

☐ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code.

Rationale and Reference(s):

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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI (event code CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

☒ YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at PTC Alliance – Jane Lew Division (formerly Pittsburgh Tube Company), EPA ID # WVD060692126, located at 533 Industrial Park Road, Jane Lew, West Virginia, 26378. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

☐ NO - "Current Human Exposures" are NOT "Under Control."

☐ IN - More information is needed to make a determination.

Completed by (signature) SIGNED Date 7/21/09
(print) Denis Zielinski
(title) Senior RPM

Supervisor (signature) Denis Zielinski SIGNED for Date 7/29/09
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