



# Long-Term Stewardship Assessment Report

## Constellium Rolled Products

EPA ID #: WVD009233297

Ravenswood, WV 26164

Assessment Date: **September 16, 2024**

### **Introduction:**

In EPA Region 3 and its RCRA-Authorized states, a Long-Term Stewardship (LTS) or “LTS Assessment Visit” refers to a site inspection that includes both a record review and a field inspection to ensure that the remedies are implemented and maintained according to the final decision. This involves evaluating whether a previously remediated facility or a former facility site continues to meet the environmental protection standards over time by ensuring that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The LTS program periodically assesses 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.

**Facility Background:** Kaiser Aluminum and Chemical Company originally developed the site in Ravenswood, WV as an integrated aluminum production facility in the 1950’s. In 1989, Ravenswood Aluminum Corporation purchased the entire Kaiser plant, except for two separate parcels (Spent Potliner Pile and Spent Potliner Vault). Ravenswood Aluminum Corporation became Century Aluminum of West Virginia (CAWV or Facility) in 1997. CAWV sold the cast house and fabrication portion of the plant to Pechiney Rolled Products in 1999. Pechiney was acquired by Alcan Rolled Products in 2003, which was, in turn, acquired by Constellium Rolled Products (Constellium or Facility) in 2011. EPA issued a Final Decision and Response to Comments (FDRTC) for Constellium in November 2011. The Corrective Measures Implementation Plan (CMIP) dated October 2013 was approved by EPA in November 2013. An environmental covenant, developed with the guidance of EPA and WVDEP, was executed and recorded in the deed of the Facility property in June 2020.

**Current Site Status:** The Hazardous Waste Cleanup Program activities at the Constellium Facility are conducted in accordance with the November 2011 Final Decision and the EPA Administrative Order on Consent (AOC) of August 2013. Accordingly, the EPA is the lead agency that provides oversight of RCRA Hazardous Waste Cleanup activities at the Constellium site. Constellium is also currently under a WVDEP RCRA (TSD) permit, which expires on January 3, 2028. Constellium is an active facility producing plate, sheet, and coil aluminum rolled products.

**Long-Term Stewardship Site Visit:** On September 16, 2024, WVDEP conducted an LTS assessment site visit with representatives from two parties at the Ravenswood facility (TRC and Constellium and their contractors) to discuss and assess the status of the implemented remedies at the site. This is the first LTS visit to the site since the June 23, 2016 visit conducted by EPA personnel. The former CAWV Facility portion was not included in this assessment visit as it is currently being remediated under the West Virginia Voluntary Remediation Program (VRP Project # 24024) for redevelopment.

The attendees were:

Name	Organization	Email Address
Kenan Cetin	West Virginia Dept of Env. Protection (WVDEP)	kenan.cetin@wv.gov
Hiral Kukkillaya	WVDEP	hiral.kukkillaya@wv.gov
John Lockhart	WVDEP	john.v.lockhart@wv.gov
Michael Hofe	WVDEP	michael.p.hofe@wv.gov
Mike Steel	Constellium Rolled Products	mike.steele@constellium.com
Chris Harvey	TRC Companies	CHarvey@trccompanies.com
Karen Souza	Allegheny Environmental Services Inc.	ksouza@alleghenyenviron.com
Scott Rasmussen	Allegheny Environmental Services Inc.	srasmussen@alleghenyenviron.com

**Institutional Controls (ICs) Status:** Institutional controls described for Constellium in the FDRTC include: 1) a restriction on the use of groundwater for potable purposes; 2) a restriction on well drilling without prior agency approval; 3) a restriction on the use of property for any purpose other than industrial; and 4) a restriction on earth moving activities in Areas designated in the Environmental Covenant as 6, 8, and 14 without prior written prior agency approval.

Area 14 (Subsurface Debris Area) has a Materials Management Plan, outlined in Section 4 of the CMIP, detailing protocols to be used for managing soil and groundwater during any future subsurface activities. The CMIP also includes a Health and Safety Plan, a Sampling and Analysis Plan and a Quality Assurance Project Plan.

With guidance from agencies, the Facility has developed an environmental covenant pursuant to WV Code 22-22B-1, et seq., which was finalized and recorded with the property deed on June 16, 2020. The Facility certifies the maintenance of the ICs in progress reports submitted annually. WVDEP confirmed that the ICs are maintained or in place during the visit.

**Engineering Controls (ECs) Status:** The FDRTC requires Constellium to operate, maintain, and monitor the existing security fence and security cameras around the entire parcel. The Facility certifies the maintenance of the ECs in progress reports submitted annually. WVDEP confirmed that the facility security fence and cameras are in place.

Constellium is also required to follow the EPA approved groundwater monitoring plan. Monitored Natural Attenuation (MNA) was selected as the remedy for groundwater in the FDRTC, with the goal of restoring groundwater to drinking water standards. Until these

standards are met, Constellium will conduct annual monitoring of the natural attenuation of arsenic in groundwater at wells MW-8s and MW-11. During this visit, WVDEP observed wells MW-8s and MW-11 on location. The Facility, through their contractor Pace Analytical, Inc., has been sampling these wells and providing analytical results, included in Annual MNA Reports since 2017. The 2023 Annual MNA report was submitted in May 2024.

**Reporting Requirements/Compliance:** Operation and maintenance of existing engineering controls will involve quarterly monitoring of the fences and gates, with maintenance performed as needed. Annual progress reports must be submitted to the agencies (both EPA and WVDEP) throughout the period that the EPA's Administrative Order on Consent is effective. For the assessment report purposes, WVDEP is able to verify that the Facility has been in compliance with the reporting requirement having provided verification of all the required ICs, ECs, and monitoring responsibilities.

**Financial Assurance:** Financial Assurance is not required for Hazardous Waste Cleanup/Corrective Action activities at the Facility per statements made in the 2011 Statement of Basis, as well as the 2016 LTS Assessment Report.

**Mapping:** The mapping of the Facility is complete. The EPA Facility website map is accurate and the website includes a geospatial PDF map showing surveyed boundaries of all the use restriction areas.

**Conclusions and Recommendations:** During this assessment visit, WVDEP observed and verified that the engineering controls selected for the facility are implemented and remain intact and undamaged. Monitoring wells were verified to be in good condition (see attached Images 1 through 9). Furthermore, no IC deficiencies have been identified at the Facility.

Based on the historical groundwater data trends, the effectiveness of MNA appears uncertain. An evaluation of MNA effectiveness will be discussed with the Facility within the scope of the MNA report reviews in the near future.

### **Attachments:**

**Images 1 & 2:** Two images from the Monitoring well MW-8s and its vicinity.

**Images 3 & 4:** Two images from Monitoring Well MW-11 and its vicinity.

**Image 5:** An image of the oil ponds looking west/northwest with Pond 1 to the right and Pond 2 to the left.

**Image 6:** An image of Pond 1 in the foreground looking west/northwest.

**Image 7:** The image of WP-2, one of ten (10) free product (oil) recovery wells in the vicinity of the oil ponds area.

**Image 8:** The image of TRC-2, one of the 4 groundwater wells monitored for total lead in the vicinity of oil ponds area.





**Images 1 & 2:** Two images from the Monitoring well MW-8s and its vicinity.





**Images 2 & 3:** Two images from Monitoring Well MW-8s and its vicinity.



**Image 5:** An image of the oil ponds looking west/northwest with Pond 1 to the right and Pond 2 to the left.





**Image 6:** An image of Pond 1 in the foreground looking west/northwest.





**Image 7:** The image of WP-2, one of ten (10) free product (oil) recovery wells in the vicinity of the oil ponds area.





**Image 8:** The image of TRC-2, one of the 4 groundwater wells monitored for total lead in the vicinity of oil ponds area.