

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
PERMIT MODIFICATION  
FOR CORRECTIVE ACTION AND WASTE MINIMIZATION  
UNDER THE HAZARDOUS AND SOLID WASTE  
AMENDMENTS OF 1984

Permittee: Carpenter Technology Corporation

Facility Location: 101 West Bern Street  
Reading, Pennsylvania 19612-4662

EPA Identification Number: PAD 00 234 4315

This Permit Modification is issued by the United States Environmental Protection Agency (EPA) under the authority of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C. §§ 6901 et seq., and regulations promulgated thereunder and set forth at 40 C.F.R. Parts 260-271, to Carpenter Technology Corporation (hereinafter "Permittee"), to meet the requirements of HSWA at the Facility located on 101 West Bern Street, Reading, Pennsylvania 19612-4662, at latitude 40° 01' 24" North and longitude 75° 56' 26" West ("Facility").

This Permit Modification requires the Permittee to implement corrective action at its Facility for the Solid Waste Management Units that are subject to the Facility's HSWA Corrective Action Permit (I.D.# PAD 002344315; see Part I, Section F of the Permit (PERMIT MODIFICATION, REVOCATION AND REISSUANCE)). The Permit Modification requires the Permittee to implement groundwater recovery and treatment and associated monitoring activities.

This permit action modifies the HSWA permit that EPA issued to the Permittee on March 25, 1991, effective May 1, 1991 (hereafter, the "Original Permit" or "Permit"). The Permittee must comply with all terms and conditions of this permit modification and all existing terms and conditions of the original Permit.

This Permit Modification is based on the assumption that the information provided to EPA by the Permittee is accurate. Further, this permit modification is based in part on the provisions of RCRA § 3004(u), 42 U.S.C. § 6924(u), which requires corrective action for all releases of hazardous waste or hazardous constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit,

regardless of the time at which waste was placed in such unit.

Any inaccuracies found in the information submitted by Permittee in connection with the Permit or this Permit Modification may be grounds for the termination, modification or revocation and reissuance of the permit, as modified, and potential enforcement action (see 40 C.F.R. §§ 270.41, 270.42 and 270.43). The Permittee must inform EPA immediately of any deviation from or changes in the information which would affect the Permittee's ability to comply with the applicable statutes, regulations, or permit conditions.

The Permit issued to Permittee on March 21, 1991 and effective on May 1, 1991 is modified as follows:

1. The following Sections are added to the end of Part II of the Permit:

#### I. CORRECTIVE MEASURES IMPLEMENTATION

Based on the information submitted by the Permittee during the RCRA Facility Investigation (RFI), in the Interim Measures Reports during the period of 1991 through 1997, and other relevant information, the Regional Administrator has selected a remedy for this facility. This Permit Modification incorporates such remedy and provides for its implementation pursuant to 40 C.F.R. § 270.41.

Commencing on the effective date of this Permit Modification and thereafter, the Permittee shall implement the remedy selected by EPA, which consists of pumping and treating contaminated groundwater via a series of groundwater recovery and leachate collection systems that redirect contaminated groundwater to the Permittee's NPDES (I.D. No. PA0013129) permitted wastewater treatment plant (see Figures 1 and 2). The wastewater treatment plant is designed to treat Volatile Organic Compounds (VOCs) and metals. The pump and treat system consists of five recovery wells installed at the Facility that are used for groundwater control and recovery.

#### 1. Media Cleanup Requirements/Points of Compliance

The following table lists the Points of Compliance and the respective media cleanup requirements for contaminated groundwater that the Permittee shall achieve, unless the requirements are determined to be technically impracticable pursuant to Section 2 below. During the term of this permit, the Permittee shall

monitor the pump and treat system's performance on a semi-annual basis and submit results to EPA.

**Point of Compliance	TCE	PCE	<del>1,1-DCA</del>	1,1,1-TCA	1,1-DCE	1,2-DCE <sup>C15</sup>
85-01	5	5	5	200	7	70
85-04	5	5	5	200	7	70
89-01	5	5	5	200	7	70
89-07	5	5	5	200	7	70
92-02	5	5	5	200	7	70
92-04D	5	5	5	200	7	70
92-05D	5	5	5	200	7	70
92-07	5	5	5	200	7	70

\*\*See Figure 3 for locations

All concentrations are expressed in microgram/liter (ug/l).

## 2. Evaluation of the Selected Remedy

Commencing on the effective date of this Permit Modification, the Permittee shall submit a progress report on remedy performance every three (3) years to confirm that the media clean-up requirements remain feasible. If EPA determines that the selected remedy will not comply with the media clean-up requirements, EPA may require the Permittee to perform additional studies and/or perform modifications to the existing remedy.

The Permittee may petition EPA to revise the cleanup requirements after three (3) years from the effective date of this Permit Modification, in the event that the concentrations of VOCs in the groundwater have attained steady-state conditions (equilibrium concentrations). In such case, acceptable cleanup requirements will be evaluated and revised based on the most current acceptable standards as determined by EPA (e.g., Risk Assessment) for evaluating adverse impact to potential receptors at the property boundary.

## J. FINANCIAL ASSURANCE

Within one hundred and twenty (120) calendar days after the Permit Modification is effective, the Permittee shall demonstrate to EPA financial assurance for completing the approved remedy in accordance with 40 C.F.R. §264.101(b).

**K. COMPLETION OF REMEDY**

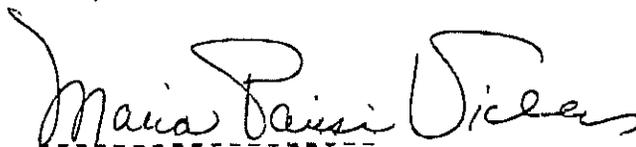
Within ten (10) days of receipt of notification by EPA that the remedy is complete, the Permittee shall submit a written certification to the EPA by registered mail stating that the remedy has been completed in accordance with the requirements of this Permit Modification. The certification must be signed by the Permittee and by an independent registered professional engineer.

**L. EFFECTIVE DATE**

This Permit Modification is effective November 2, 1998 and expires October 31, 2008 unless modified by EPA.

9/29/98

DATE SIGNED



Maria Parisi Vickers  
Associate Director for RCRA  
Waste and Chemicals  
Management Division  
U.S. EPA  
Region III