



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 7, 2020

Mr. Robert Prezbindowski
Senior Remediation Project Manager
Arconic, Inc.
Tennessee Operations
2300 North Wright Road
Alcoa, Tennessee 37701-2516

Dear Mr. Prezbindowski:

RE: RCRA Corrective Action
Interim Measures Work Plan
Elliott Ditch – Levee Soil Remediation
Revised November 2019
Arconic Lafayette Operations
Lafayette, Tippecanoe County
EPA ID No. IND005478094

The Indiana Department of Environmental Management (IDEM) reviewed the above-referenced work plan (VFC # 82863525), submitted on your behalf by Civil & Environmental Consultants, Inc. on November 14, 2019, that describes the remediation of polychlorinated biphenyl (PCB) contamination found in the Elliott Ditch levee. This work plan is a revision to one previously submitted and conditionally approved by IDEM on August 8, 2019 (VFC # 82822428). The conditional approval required U.S. EPA's acceptance of the post-excavation sampling scheme; the revised work plan now meets that requirement. All other comments made on the original work plan remain valid and are reproduced here.

The work plan relies on the geomorphic surface mapping done in 2013 and 2014, as documented in the Elliott Ditch Geomorphic Surface Mapping and Historic Data Review, dated July 6, 2015 (VFC # 80110943) and the results of the Field Sampling Plan, as summarized in the Elliott Ditch Reaches 1-3 Field Sampling Report, dated August 2018 (VFC # 82815864).

IDEM approves the work plan, with the following comments:

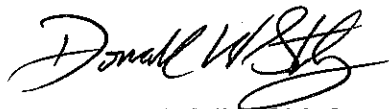
- As stated in the work plan, the risk-based remedial objective (RBRO) for this project is 1 mg/Kg PCB. This RBRO was chosen to be protective of human health and to reduce the exposure of ecological receptors to PCB contamination. While both the U.S. Environmental Protection Agency (U.S. EPA) and IDEM support the use of the 1 mg/Kg PCB RBRO, a cleanup to this level may not be sufficient to return the affected surface water bodies to unlimited use, particularly in regard to fish consumption.

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- The work plan allows for the temporary storage of excavated soil within the footprint of the excavation. Any soil stockpiled in this manner must be properly managed so as to prevent run-on and run-off of water.
- For soil removal and confirmation sampling purposes, the lateral and vertical extent of affected soil extends from the location that exceeds 1 mg/Kg PCB to the location where the concentration is \leq 1 mg/Kg PCB.
- The higher result between a sample and its duplicate will be used to determine if additional soil removal is necessary.
- The Community Relations Plan should also include precautions to be taken to prevent exposure to the excavated soil and excavation equipment during these Interim Measures activities.
- Arconic will provide U.S. EPA Region 5 and IDEM copies of the Erosion and Sedimentation Control Plan, Notice of Intent, and the approval letter from the City of Lafayette. These copies are for informational purposes only.
- Arconic will provide U.S. EPA Region 5 and IDEM results of the analytical testing of borrow soil, ensuring an adequate frequency of samples are analyzed to substantiate all borrow soil is \leq 1 mg/Kg PCB.

IDEM understands this approval will be used in Arconic's request for a TSCA Coordinated Approval from U.S. EPA Region 5. If you have any questions, please contact me at (317) 232-3409 or dstilz@idem.IN.gov.

Sincerely,



Donald W. Stilz, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

cc: Peter Ramanauskas, U.S. EPA, Region 5 (ecopy only)
Jean Greensley, U.S. EPA, Region 5 (ecopy only)
J. Matt Bruck, P.E., Civil & Environmental Consultants, Inc. (ecopy only)