



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

### SENT ELECTRONICALLY

Mr. Robert Prezbindowski  
Arconic, Incorporated  
2300 North Wright Road  
Alcoa, Tennessee 37701

Re: Application for a Risk-Based Toxic Substances Control Act (TSCA) Approval for Remediation of PCB Contaminated Sediment and Soil - Elliott Ditch Reaches 1-3 Submitted March 5, 2021 per 40 CFR § 761.61(c)  
Arconic Lafayette Operations Facility, 3131 East Main Street, Lafayette, Indiana  
EPA ID: IND005478094

Dear Mr. Prezbindowski:

This letter is in response to the March 5, 2021 request submitted by Arconic, Incorporated (Arconic) to the U.S. Environmental Protection Agency, Region 5 (EPA) for a Risk-Based Approval, under the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2601 et seq., and 40 Code of Federal Regulations (CFR) § 761.61(c). The Approval request is for the remediation of Polychlorinated Biphenyls (PCBs) in Reaches 1 to 3 of Elliott Ditch adjacent to the Arconic's Lafayette Operations Facility, located at 3131 East Main Street, Lafayette, Indiana. PCB impacts to Elliott Ditch are believed to be associated with historic discharges from Arconic Facility Outfall 001.

Arconic's March 2021 Resource Conservation Recovery Act (RCRA) Corrective Action Interim Measures Work Plan (IMWP) for Elliot Ditch Reaches 1 to 3 sets the Risk-Based Remedial Objective (RBRO) for this project at 1.0 part per million (ppm) total PCBs. The remedial work in Reaches 1 to 3 will extend from Outfall 001 to upstream of the 9<sup>th</sup> Street Bridge. It will include remediation of sediment within Elliott Ditch and removal of soil on personal property. While the IMWP was submitted for Reaches 1-3, Arconic is delaying the remediation of the PCB contaminated soil in Reach 3 to the 2022 field season. Arconic will perform confirmation sampling to ensure the remedial project meets the 1.0 ppm RBRO.

Based upon the information presented in Arconic's IMWP for the remediation of the Elliott Ditch Reaches 1-3, EPA finds that the excavation and off-site disposal of PCB remediation waste, conducted in accordance with the IMWP, will not present an unreasonable risk of injury to health or the environment. Accordingly, Arconic's March 5, 2021 request for a Risk-Based Approval for the subject PCB remediation activities is granted in accordance with this Approval and the PCB regulations at 40 CFR § 761.61(c).

In accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(ii) and §761.61(a)(5)(v)(A), the removed sediment and soil, which has been characterized at under 50 ppm PCBs, will be disposed of at a RCRA Subtitle D facility approved to accept PCB material. If 50 ppm or greater PCB material is discovered during the remedial project, it will be removed to the RBRO and disposed of at a RCRA Subtitle C facility or a TSCA chemical waste landfill in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(iii). If Arconic mixes the PCB contaminated sediment with a drying agent, Arconic must ensure the drying agent does not elevate the temperature of the sediment such that PCBs are volatilized.

Arconic must notify the EPA and the Indiana Department of Environmental Management (IDEM) project managers in writing seven (7) calendar days prior to commencing the remediation of Reaches 1, 2 and 3. You must also notify EPA, in writing, within fourteen (14) calendar days of any changes relating to PCB waste management requirements in the IMWP. You must comply with all the reporting and recordkeeping requirements in 40 CFR Part 761, Subparts J and K. Lastly, this Approval requires you to prepare and submit to EPA and IDEM a Remediation Completion Report (RCR) for Elliott Ditch Reaches 1 and 2 and Elliott Ditch Reach 3 within 60 days of the completion of the project restoration. The RCR shall contain, at a minimum, the following: a summary of the PCB removal activity, an explanation of any deviations from the IMWP, a summary of the restoration activity, the TSCA and non-TSCA disposal volumes, figures showing the project excavation areas and confirmation sampling results, confirmation sampling data.

This letter does not relieve Arconic from compliance with any other federal, state, or local laws or regulations and does not preclude EPA from initiating any enforcement action, including an action seeking civil or criminal penalties for any violation of any applicable federal law or regulation. If you have any further questions regarding this matter, please feel free to contact Jean Greensley of my staff at (312)353-1171 or [greensley.jean@epa.gov](mailto:greensley.jean@epa.gov).

Sincerely,

 5/26/2021

Edward Nam  
Director  
Land, Chemicals and Redevelopment Division

cc: Donald Stilz, IDEM (via email)  
J. Matt Bruck, P.E., Civil & Environmental Consultants, Inc. (via email)

bcc: John Stekete, ORC  
Jean Greensley, CAS 1  
Peter Ramanauskas, CAS 1