

Long Term Stewardship Report
ArcelorMittal Steelton LLC
(Formerly ISG Steelton Inc., and Bethlehem Steel Corp.-Steelton)
215 South Front Street, Steelton, PA 17113
PAD003026531

EPA web fact sheet : <http://www.epa.gov/reg3wcmd/ca/pa/webpages/pad000797928.html>

September 26, 2016

A. Pre-Inspection Items

Prior to the site visit, the following pertinent documents were reviewed to ensure remedial components are adequate and up to date:

1. 12/17/1993 FDRTC
2. AOC addendum 01/21/1994

In addition, financial assurance state of the facility was confirmed; EPA fact sheets, links and mapping documents were reviewed and updated; and a site visit was coordinated with the facility and PADEP. A meeting with the Borough of Steelton officials may be scheduled at a future date.

Remedy Components:

1. cap contaminated soil at SWMU 24 with concrete
2. install a fence and gates to restrict access to contaminated soil area
3. install a guard to restrict access to area
4. operation change: remove dust with backhoe for disposal and operators use dust masks
5. record a deed restriction to notify future owners of need to maintain corrective measures
6. submit annual assessment report to EPA for O&M of remedy (for 30 years)
 - a. Former EPA project Manager at time of AOC addendum issuance verbally told facility that annual assessment reports do not need to be submitted to EPA, but only retained in facility files.

A hazardous waste landfill (Area 8) that falls under Corrective Action obligations (as it it pre-RCRA) is currently being managed under the PADEP Post Closure Program. Adjacent to Area 8, there are 2 other landfills; a hazardous waste landfill regulated under the PADEP RCRA Post Closure Program, and a residual waste landfill, managed under the PADEP Residual Waste Program. As these 3 landfills are close to each other, a decision was made between EPA, PADEP and the facility to define a monitoring well network around all of the landfills, and manage the O&M of the landfills and well network under the PADEP Post Closure program. A Post Closure Permit was issued September 2011. In August 2011, an environmental covenant was recorded for the Area 8 landfill which defines land and groundwater use restrictions at that landfill, in compliance with EPA request to ensure notification to future property owners. Compliance with the Psot Closure Permit requirements under PADEP authority are not evaluated in this LTS Report.

B. Site visit 08/16/2016

1. Attendees

Name	Affiliation	Phone	Email
Linda Matyskiela	EPA Proj Mgr	215.814.3420	Matyskiela.Linda@epa.gov
Charlene Sauls	PADEP – SCRO PG	717.705.4959	chsauls@pa.gov
Carrie Fleming	PADEP – SCRO Solid Waste Supervisor	717.705.6642	cafleming@pa.gov
Jessica Shilladay	PADEP – SCRO Solid Waste Specialist	717.705.4971	jesshillad@pa.gov
Ajaz Uddin	PADEP – SCRO PE	717.705.4924	auddin@pa.gov
Scott Werkheiser	ArcelorMittal – PE, Env Mgr	717.986.2454	scott.werkheiser@arcelormittal.com

2. Introductions and purpose of visit

3. File review

Does the facility have a copy of:

- a. 12/17/1993 EPA FDRTC Y X N ____
b. 01/21/1994 AOC Addendum Y X N ____

Note: EPA emailed all Administrative Orders on Consent to Facility in advance of LTS visit. 02/27/1989, 02/24/1992, 01/21/1994, and the 12/17/1993 FDRTC.

4. Site Walk

a. Assess locations and conditions of remedy components:

1. Is there a geo-locational map (CAD map?) **not yet – will discuss with facility.**

2. Are all aspects of remedy in place? **No. Although the entire floor of the steelmaking building, where SWMU 24 is located, is capped in concrete, and a fence, gate and guard are available at the entrance to the facility, the other pieces of the remedy are not in evidence. Missing: 1) designation of the exact location of the SWMU 24 cap (all of the floor is concrete in the building); 2) deed restriction; 3) annual assessment reports. Exposure pathways are currently mitigated with the portions of the remedy that are in place.**

3. Is remedy effective and appropriate to mitigate exposures to contaminated soils? **EPA believes the remedy would be effective and appropriate if properly maintained and executed. EPA will re-evaluate this after all parts of the remedy are implemented.**

5. Questions/discussion:

1. There is deed restriction language required. Is there a plan for a covenant for the property?

Covenant will be discussed with owners as property may be sold.

3. Are there any other ordinances that put restrictions on land use or GW use?

No municipal ordinances put restrictions on use.

4. Any modification to remedy needed? **Not as yet.**

5. Any GIS info/data still needed by EPA? PADEP?

Yes – EPA does not currently have property boundaries or GIS data for SWMU 24. GIS data and survey needs were discussed at the meeting and will be further developed.

6. Most recent O&M Plan Date? Do we need an update?

EPA and facility will review O&M requirements to determine if changes are needed. Reports will be required to be submitted to EPA in the future.

8. Timeline on facility next steps.

EPA will discuss with facility how to bring remedy into compliance. No timeline on compliance discussed.

11. FA obligations up to date? Bond amount?

No Corrective Action FA obligations are required under the AOC addendum or the prior AOCs listed in B.3. Hazardous waste landfill FA obligations required by PADEP are up to date.