STATEMENT OF BASIS/FINAL DECISION AND RESPONSE TO COMMENTS SUMMARY

Techalloy Company, Inc.
Perris, California
(Signed May 10, 1995)

Facility/Unit Type: Manufactures stainless steel and nickel alloy wire used by aerospace and other related industries
Contaminants: Benzene, Beryllium, Cadmium, Chromium, Chromium VI, Nickel
Media: Groundwater
Remedy: Installing extraction wells; treating groundwater in the on-site wastewater treatment plant; implementing institutional controls, and continued groundwater monitoring.

FACILITY DESCRIPTION

Techalloy Company, Inc. is a stainless steel and nickel alloy wire manufacturer located in Perris, California. Industrial wastewater from the manufacturing operation at the Techalloy facility contains high levels of dissolved metals, acids, nitrates, sulfates, and total dissolved solids (TDS). During past operations, the industrial wastewater was discharged into three evaporation ponds, or surface impoundments, located on the facility’s property. During a routine inspection in 1984, an inspector from the Santa Ana Regional Water Quality Control Board (SARWQCB) found contaminated soil under one of the impoundments. On October 29, 1984, SARWQCB issued a cleanup and abatement order requiring Techalloy to properly dispose of all waste materials associated with the impoundment and to mitigate waste migration according to an approved schedule.

Subsequent on-site and off-site groundwater monitoring, also required by the order, found that hazardous constituents had leaked into the groundwater. In December 1988, EPA and Techalloy entered into a consent decree under §3008(a) and 3008(h) of RCRA. In accordance with the consent decree, Techalloy completed closure of the surface impoundments in July 1989 and conducted an RFI from 1989 to 1991. The RFI identified two distinct groundwater plumes; a non-hazardous constituents plume and a hazardous constituents plume.

The Techalloy facility consists of three main buildings, a former drum storage area, product storage areas, sludge bins, three capped former surface impoundments, and a wastewater treatment system. The facility occupies approximately 7 acres of land. The land immediately surrounding the property is used for residential (about 0.25 mile north) and agricultural (east, west, and south) purposes. Local topography slopes gently to the south and southeast toward the San Jacinto River. The facility is located within the central portion of the Perris Block which is bounded by the Elsinore Fault Zone and the San Jacinto Fault Zone.

The facility also lies within the Perris-South II subbasin of the San Jacinto groundwater basin. The groundwater basin drains into the San Jacinto River which drains into the Railroad Canyon Reservoir, located approximately two miles south of the facility. The groundwater located in the Perris-South II subbasin is used for agricultural and municipal/domestic purposes, which includes drinking water. There are no known drinking water wells located within the immediate vicinity of the Techalloy facility. Unconfined groundwater lies within fractured bedrock at a depth of approximately 20 feet beneath the facility. Groundwater flows from the northwest towards the southeast at a calculated rate of about 20 to 200 feet per year.
CONTAMINATION DETECTED AND CLEANUP GOALS

<table>
<thead>
<tr>
<th>Media</th>
<th>Estimated Volume</th>
<th>Contaminant</th>
<th>1995/1996 Concentrations (mg/l)</th>
<th>Action Level</th>
<th>Cleanup Standard</th>
<th>Point of Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>Unknown</td>
<td>Benzene</td>
<td>0.022</td>
<td>None</td>
<td>0.001</td>
<td>Hazardous constituents plume</td>
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<tr>
<td></td>
<td></td>
<td>Beryllium</td>
<td>0.039</td>
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<tr>
<td></td>
<td></td>
<td>Cadmium</td>
<td>0.17</td>
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<tr>
<td></td>
<td></td>
<td>Chromium</td>
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<tr>
<td></td>
<td></td>
<td>Chromium VI</td>
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<td></td>
<td></td>
<td>Nickel</td>
<td>457</td>
<td></td>
<td>0.10</td>
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</tr>
</tbody>
</table>

EXPOSURE PATHWAYS

Groundwater is the potential exposure medium of primary concern. Exposure via groundwater would include ingestion.

SELECTED REMEDY

Contaminants of concern found in the groundwater include benzene, beryllium, cadmium, chromium, chromium VI, and nickel. In response to public comments, the scope of the corrective measure proposed in the Statement of Basis was modified to allow the California EPA, Department of Toxic Substances Control (DTSC), in conjunction with SARWAQMB, to make a final decision as to whether remediation of the non-hazardous constituent plume is necessary and to incorporate a phased approach toward remediation of the hazardous constituents plume.

The selected final remedy includes: 1) pumping of groundwater from the hazardous constituents plume via extraction wells; 2) treating the extracted groundwater using the wastewater treatment plant already in existence at the Techalloy facility; 3) placing institutional controls on the facility's property; and 4) continued groundwater monitoring.

Phased implementation will first include the installation of two to three extraction wells with further expansion depending upon the effectiveness of the initial remediation system. The estimated cost is approximately $225,200 for the first phase (4 years).

PUBLIC PARTICIPATION

The 45 day public comment period extended from July 15, 1994 through August 29, 1994. EPA developed an information repository and distributed a fact sheet with background information regarding the Techalloy facility and a description of the proposed corrective action measures. The fact sheet was distributed to a mailing list consisting of approximately 361 local residents, businesses, agencies, and other interested parties in mid-July. The proposed remedy was also announced in The Press-Enterprise newspaper on July 13, 1994, and in the Perris Progress newspaper. Public comments were received and incorporated into the remedy selection process.

NEXT STEPS

EPA will incorporate by reference the final statement of basis and response to comments into the CMS report. Techalloy must submit a Corrective Measures Implementation Plan to EPA within the time period set forth in the consent decree. The final corrective measures will be implemented and Techalloy will conduct additional investigations into the lateral extent and impact of the non-hazardous constituent plume. If the investigation determines that remediation of the non-hazardous constituent plume in needed, such remediation may be required under Techalloy's post-closure permit as issued by DTSC.

INNOVATIVE TECHNOLOGIES CONSIDERED

None.
KEY WORDS:
California; groundwater; ingestion; benzene, beryllium, cadmium, chromium, chromium VI, nickel; extraction wells, on-site treatment, institutional controls, groundwater monitoring.

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