



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

Mr. Lawrence J. McShea, P.E.
Project Manager
Arconic, Inc.
100 Technical Drive
New Kensington, PA 15069-0001

Re: Arconic, Inc. Massena, New York Facility, EPA I.D. No. NYD002232304
(formerly Alcoa, Inc.) Approval to Operate Secure Landfill Cell 3 Expansion

Dear Mr. McShea:

By this letter, the United States Environmental Protection Agency, Region 2, ("EPA") grants approval to operate the Cell 3 Expansion of the chemical waste landfill (a.k.a. Secure Landfill) at the Massena New York facility of Arconic, Inc., formerly the Aluminum Company of America, ("Alcoa" or "ALCOA") for the disposal of waste containing polychlorinated biphenyls (PCBs). The chemical waste landfill is herein designated as the "Arconic/Alcoa landfill", except where it is otherwise designated as the Alcoa landfill or the ALCOA landfill in previous letters and documents.

The Approval to operate the Cell 3 expansion of the Arconic/Alcoa landfill is issued pursuant to the federal regulations concerning PCBs promulgated pursuant to the Toxic Substances Control Act and contained in Title 40, Part 761 of the Code of Federal Regulations (40 C.F.R. Part 761). Approval to operate Cell 3 is based on Alcoa's original application and supporting documents, the final Certification Report and the final Operations and Maintenance Manual. The disposal of PCBs in the Arconic/Alcoa landfill is subject to compliance with the federal regulations at 40 C.F.R. Part 761, the conditions in this Approval letter, the aforementioned documents and the approval to operate Cell 3 expansion issued by the New York State Department of Environmental Conservation ("NYSDEC") on November 2, 2018.

Acceptance Requirement and Effective Date

This Approval shall become effective on the date the Director of the Clean Air and Sustainability Division, EPA Region 2 receives written notification from Arconic of its acceptance of, and intention to comply with, the terms and conditions of this Approval. This proposed Approval may be withdrawn if such notification from Arconic is not received within forty-five (45) calendar days of the date herein.

May 1, 2018	Revised Certification Report for Expansion of Cell 3 of the Secure Landfill Massena West Plant SLF Cell 3 Operations Memorandum SLF 3 Expansion Record Drawings Response to EPA comments dated April 18, 2018
June 1, 2018	Secure Landfill O&M Manual
November 2, 2018	NYSDEC's approval to operate the Cell 3 expansion
December 3, 2018	Arconic's letter to EPA requesting approval to operate the Cell 3 expansion

Time Period for PCB Waste Acceptance

Subject to the limitation on capacity specified below and unless NYSDEC extends its authorization for operation of Cell 3, the Arconic/Alcoa landfill Cell 3 may receive PCB waste only until August 31, 2023. Arconic should copy EPA on any such extension requests submitted to NYSDEC. In the event that NYSDEC extends its authorization past August 31, 2023, then Cell 3 may receive PCB waste until the sooner of the new date specified by NYSDEC or five years from the date of Arconic's notification of its acceptance of the terms of this Approval.

Unless such extension to operate is requested and granted, by September 30, 2023 Arconic shall submit plans to permanently close the facility by August 31, 2024 (see Closure Requirements, below).

Waste Source and Permitted Volume (Capacity)

PCB waste which may be disposed in Cell 3 of the landfill is limited to sediments (including stabilization and bulking agents) and miscellaneous contaminated debris, (e.g. Remedial Options Pilot Study ("ROPS") and staging area wastes) associated with the dredging of the Grasse River, other cleanup actions performed pursuant to the *Record of Decision for the Grasse River Superfund Site*, dated April 2013, as well as related cleanup actions determined to be necessary by NYSDEC. The maximum permitted volume of waste disposed in Cell 3 (i.e., its design capacity) is approximately 276,000 cubic yards, including waste already disposed in Cell 3. The actual volume of PCB waste to be disposed will be determined by the disposal needs of the aforementioned cleanup actions.

Risk To Health or the Environment

EPA Region 2 finds that the operation of the Cell 3 expansion area of the Arconic/Alcoa landfill in accordance with the conditions and requirements of this Approval, NYSDEC's approval to operate the Cell 3 expansion, and EPA's original Cell 3 approval letter including Appendix A attached thereto (to the extent the conditions and requirements do not conflict with the conditions and requirements contained in this Approval) will not present an unreasonable risk of injury to health or environment from PCBs.

Responsibility and Obligations of Arconic and Any Successor

Arconic shall be responsible for the actions of all individuals, contractors or agents which are involved in activities relating to this Approval. Furthermore, Arconic's obligations under this Approval shall be binding on any successor of Arconic Inc. whether such successor is created by merger, corporate reorganization, divestiture, or otherwise. The provisions of 40 C.F.R. § 761.75(c)(7) will also apply to any future successors of Arconic Inc.

Modification, Suspension or Revocation

This Approval may be suspended, revoked, modified, or otherwise altered at any time if evidence indicates a violation of the conditions of this approval, or of 40 CFR Part 761, or of any other applicable rules or regulations has occurred, or if it is determined that the continued implementation presents an unreasonable risk of injury to public health or the environment.

Furthermore, receipt of evidence that misrepresentation of any material fact has been made in the application, or that all relevant facts have not been disclosed, shall constitute sufficient cause for suspension, revocation or modification of this approval.

Any change or modification in requirements or conditions of this Approval proposed by Arconic, including any proposal to permit PCB wastes from additional sources to be placed in the Cell 3 expansion area, must receive prior written approval from EPA to become effective.

Compliance Failure

Failure to comply with the conditions of this Approval constitutes a violation of the PCB regulations and § 15 of TSCA, 15 U.S.C. § 2614.

Sincerely,

John Filippelli, Director
Clean Air and Sustainability Division

cc: Peter R. Taylor, NYSDEC Region 6 Headquarters