



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

Division of Remediation  
William R. Snodgrass TN Tower  
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Nashville, Tennessee 37243

**PUBLIC NOTICE  
OF  
RECORD OF DECISION  
FOR  
TENNESSEE FORGING STEEL SITE  
SITE NUMBER 73-508  
HARRIMAN, ROANE COUNTY, TENNESSEE**

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation (DoR) has drafted a proposed Record of Decision for the Tennessee Forging Steel site (the Site). The Record of Decision will be the document used to explain the clean-up plan for the Site.

The Site comprises approximately 22 acres of land located at 2408 South Roane Street in Harriman, Roane County, Tennessee. The Site is being addressed through the Voluntary Cleanup, Oversight and Assistance Program (VOAP). This program allows willing and able parties to voluntarily investigate and clean up hazardous substance sites with oversight from DoR staff. The Site's responsible party has implemented a plan of action to close the Site. The chosen remedy for the Site will be institutional controls in the form of deed restrictions with ongoing obligations associated with monitoring and maintenance of existing engineering controls and site security.

The draft Record of Decision may be viewed at <https://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-remediation.html>. For further information about the Site or to request a paper copy of the Record of Decision, please contact the DoR project manager, Pat Gribben at 423-634-5758.

If it is difficult for you to read, speak, or understand English, TDEC can provide translation or interpretation services free of charge. Please contact DoR at 615-532-0900 for additional information.

**DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF REMEDIATION**

**RECORD OF DECISION (ROD)  
TENNESSEE FORGING STEEL  
HARRIMAN, ROANE COUNTY, TENNESSEE  
SITE ID #73-508**

**SITE DESCRIPTION**

The 22-acre site is located at 2408 South Roane Highway in Harriman, Roane County, Tennessee. The facility is currently an active scrap metal shredding and recycling facility, owned and operated by PSC Metals, Inc. as the Harriman Yard. It is noted the shredding and recycling of ferrous scrap was briefly discontinued in 2013 and the facility was limited to only aluminum scrap metal processing. However, ferrous metal recycling processes were restarted in 2014 and is active on a limited capacity to date. Currently, ferrous scrap is primarily sorted, stored and shipped to an offsite facility for processing.

**SITE OPERATIONAL HISTORY**

Tennessee Forging Steel (later Tennessee Valley Steel) formerly operated an arc furnace metal melt steel facility and steel rolling mill on a 225-acre site. A 22-acre portion of the parent tract operated as a shredder and scrap metal recycling facility since 1968 providing feedstock for an onsite secondary smelting furnace and rolling mill. Sitewide operations ceased operations in 1981 due to bankruptcy, resuming in 1988. In December 1992, the parent tract was subdivided, and a 22-acre tract was conveyed to Southern Alloy and Metals Corporation (now PSC Metals, Inc.) for continued use as a ferrous and non-ferrous metal shredding and recycling operation. The remaining acreage was retained by Tennessee Valley Steel and later conveyed to Bayou Steel Corporation.

**DOCUMENTS REVIEWED**

- *Report of Phase II Environmental Site Assessment, Tennessee Valley Steel Property, Harriman, Tennessee*, dated December 21, 1992, prepared by Scientific Ecology Group, Inc.;
- *Consent Order and Agreement in the Matter of Tennessee Valley Steel Corp. and Southern Alloys and Metal Corp.*, State of Tennessee Department of Environment and Conservation Division of Superfund, effective date September 2, 1994;
- *Site Inspection Prioritization, Tennessee Forging Steel Corporation, Rockwood, Roane County, Tennessee, U.S. EPA # TND 00-339-1455*, dated June 1, 1995, prepared by Black & Veatch Waste Science, Inc.;
- *Preliminary Remedial Investigation Report, Southern Alloys & Metals Corporation, Harriman, Tennessee*, dated November 1998, prepared by W.Z. Baumgartner & Associates;

- *Southern Alloys-Groundwater Analysis Report*, dated February 2, 2000, prepared by W.Z. Baumgartner & Associates;
- *September 2001, Groundwater Sampling Results/MW-1 and MW-2, PSC Metals, Inc. (f.k.a Southern Alloys and Metals, Highway 27, Harriman, Tennessee (Roane County), TDSF Site No. 73-508*, dated October 11, 2001, prepared by EnSafe, Inc.;
- *Semi-Annual Groundwater Sampling Report- PSC Metals, Inc. (Former Southern Alloys Site), Harriman, Tennessee, TDSF Site No. 73-508*, dated November 14, 2002, prepared by EnSafe, Inc.;
- *Semi-Annual Groundwater Sampling Report- Former Southern Alloys Site, Harriman, Tennessee, TDSF Site No. 73-508*, dated May 2, 2003, prepared by EnSafe, Inc.;
- *Semi-Annual Groundwater Sampling Report- Former Southern Alloys Site, Harriman, Tennessee, TDSF Site No. 73-508*, dated November 20, 2003, prepared by EnSafe, Inc.;
- *Second Closure Groundwater Sampling Report- Former Southern Alloys Site, Harriman, Tennessee, TDSF Site No. 73-508*, dated March 1, 2004, prepared by EnSafe, Inc.;
- *Third Quarterly Closure Groundwater Sampling Report- Former Southern Alloys Site, Harriman, Tennessee, TDSF Site No. 73-508*, dated May 20, 2004, prepared by EnSafe, Inc.;
- *Fourth Quarterly Closure Groundwater Sampling Report- Former Southern Alloys Site, Harriman, Tennessee, TDSF Site No. 73-508*, dated March 1, 2004, prepared by EnSafe, Inc.;
- *Focused Feasibility Study Report, Former Southern Alloys and Metals Site, 2408 South Roane Street, Harriman, Tennessee*, dated October 4, 2013, prepared by APB Engineering, LLC;
- Comment letter, regarding *Focused Feasibility Study Report, Former Southern Alloys and Metals Site, Harriman, Roane County, Tennessee*, from Lee Barron (TDoR) to Steve Forystek (PSC Metals, Inc.), dated December 12, 2013;
- *Monitoring Well Abandonment Report, PSC Metals, Inc. Facility, 2408 South Roane Street, Harriman, Tennessee 37748*, dated March 11, 2014, prepared by HRP Associates, Inc.;
- Letter correspondence between Tony L. Ren (PSC Metals, Inc.) and Lee Barron (TDSF), dated July 28, 2014, regarding ferrous processing at the former Southern Alloys Site; and
- Site Visit Photo Log, TDEC-DoR, dated February 26, 2019.

## **DISCUSSION OF PREVIOUS INVESTIGATIONS AND RESPONSE ACTIONS**

In 1994, Southern Alloys and Metals Corporation entered into a Consent Order with the Tennessee Department of Environment and Conservation- Division of Superfund (TDEC-DSF), Voluntary Oversight and Assistance Program (VOAP). In accordance with the Order, Southern Alloys and Metals resumed a focused investigation of the nature and extent of contamination at the 22-acre site in a 1992 Phase II Environmental Site Assessment. Subsequent groundwater monitoring, performed semi-annually until 2004, indicated that groundwater beneath the site was not contaminated above State of Tennessee Division of Underground Storage Tanks (TN-DUST) remedial action levels for benzene, toluene,

ethylbenzene and total xylenes (BTEX). Site monitoring wells were formally abandoned in 2014. Multiple areas of surficial and shallow soil and sediment contamination by petroleum hydrocarbons (TPH-ORO), metals (lead) and PCBs were identified in the 1998 Remedial Investigation (RI) Report. These areas have been addressed through various interim remedial actions including: limited contaminated soil removal; construction of concrete storage bins for storage of “shredder fluff”, oily parts and turnings, and shredded scrap metal; installation of a concrete cap in the eastern portion of the site to eliminate potential exposure to residual contaminated soils and reduce soil erosion and surface water infiltration; and construction of three stormwater retention basins, two to the east of the concrete paved shredder area and one in the southwest corner of the property to assist in stormwater retention and reduce potential for contaminated runoff to intercept streams to the east and west.

### **CURRENT SITE CONDITIONS**

The property is currently occupied by PSC Metals, Harriman Yard. The facility engages in receipt, sorting and processing of ferrous and non-ferrous scrap metal. Shredding operations are sited in the eastern half of the site, which is capped with concrete pavement. Southeast of the shredder are concrete containment structures which are used for temporary storage of zurik (sensor-sorted non-ferrous scrap that is primarily stainless steel). These structures contain drains which are connected to grease traps to retain any accumulated petroleum residue. Each of these structures has served to effectively cap areas of contamination in the eastern portion of the Site.

East of the storage bins are two narrow stormwater retention ponds. Each pond is constructed with rip-rap berms and equipped with flocculant logs and oil booms to manage turbidity and oil in captured runoff. A third detention pond is in the southwestern portion of the site and managed in the same manner as the two ponds to the east.

The western portion of the site encompasses an open area used for sorting of scrap and also contains an “end of life” vehicle dismantling area, where batteries and automotive fluids are removed prior to processing. This area comprises a surface of commingled soil and gravel. Occupied structures, including an office, a breakroom and a storage warehouse are located adjacent to the site entrance in the southern portion.

### **SITE RISK THAT THIS RECORD OF DECISION ADDRESSES**

Given the activities and cleanup performed to date, the remaining site risks include:

1. Residual contamination from PCBs, metals and petroleum hydrocarbons remains in surficial and shallow soils at the site. Potential onsite worker exposure to residual contamination has been partially mitigated by interim actions (site improvements) in the eastern portion of the site. The

remaining western portion of the site remains exposed at the surface. This area is used solely for sorting of scrap articles received by PSC Metals.

2. Residual petroleum hydrocarbons are present in groundwater beneath the site; however, these concentrations are below applicable TN-DUST action levels. Drinking water is supplied by the local municipality sourced from surface water intakes.
3. Site stormwater runoff has been improved by the installation of hardscaping across a portion of the site. Three storm water detention ponds have been constructed to manage storm water prior to discharge offsite. Storm water runoff quality is managed under the oversight of the State of Tennessee Division of Water Resources (TN-DWR).
4. Occupied structures are not present within areas of known soil contamination. Residual petroleum contamination in groundwater is not expected to represent a vapor intrusion risk.

### **REMEDIATION GOALS**

The Site is currently utilized for commercial/industrial purposes. These activities are not expected to change for the foreseeable future. Multiple, self-implemented actions, including construction of engineering controls have greatly reduced the potential for worker exposure and offsite impact to the environment. Implementation of land use restrictions is expected to mitigate risks associated with future exposure given the nature of onsite operations and existing controls in place.

### **APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS**

1. Occupational Safety and Health Administration (OSHA) regulation for worker protection;
2. Tennessee, Brownfield Projects Voluntary Oversight and Assistance Program, T.C.A. 68-212-224;
3. Tennessee, Division of Underground Storage Tanks, Technical Guidance Documents 08, 14, and 17;
4. United States Environmental Protection Agency, Regional Screening Levels;
5. RCRA hazardous waste regulations and United States Department of Transportation regulations for transport, treatment and disposal.
6. 40 CFR §761.61(a)(4)(i)(B), Toxic Substances Control Act, PCB remediation waste, low occupancy areas
7. Tennessee Department of Environment and Conservation (TDEC), Chapter 0400-12, Division of Solid Waste Management, Hazardous Waste Program;
8. TDEC Rules, Chapter 0400-15, Division of Remediation;
9. TDEC Rules- Chapter 0400-18, Division of Petroleum Underground Storage Tanks; and
10. TDEC Rules- Chapter 0400-40-03, Division of Water Resources, General Water Quality Criteria.

## **PROPOSED ALTERNATIVES**

### Alternative 1: No Action

This alternative assumes no future short-term or long-term remedial activities, including any additional engineering or institutional controls.

### Alternative 2: No Action with Institutional/Engineering Controls

This alternative assumes continued presence of existing engineering controls and implementation of land use restrictions, monitoring and maintenance of those engineering controls and site security. Land use restrictions may include limitations on intrusive activities, prohibition of groundwater use for potable purposes, limiting the Site use to commercial or industrial purposes, and periodic monitoring and maintenance of existing or future engineering controls installed within the areas of known contamination and/or the Site.

## **CRITERIA FOR EVALUATION OF ALTERNATIVES**

Tennessee Code Annotated § 68-212-206(d) specifies the criteria that the commissioner shall consider when determining containment and cleanup actions, including monitoring and maintenance for sites addressed pursuant to Part 2, Hazardous Waste Management Act of 1983. These criteria include:

- (a) The technological feasibility of each alternative;
- (b) The cost-effectiveness of each alternative;
- (c) The nature of the danger to the public health, safety, and the environment posed by the hazardous substance at the site; and
- (d) The extent to which each alternative would achieve the goal of clean up and containment of the site through the elimination of the threat to the public health, safety, and the environment posed by the hazardous substance.

## **EVALUATION OF THE PROPOSED ALTERNATIVES**

### Alternative 1: No Action

The No Action alternative would be both technologically feasible and cost-effective. However, given that residual impact likely exists beneath the concrete cap in the eastern portion of the site and the open area of the western portion of the site, this alternative would not provide sufficient long-term protection to onsite workers and the public against potential exposure to onsite contaminants. The No Action alternative does not adequately address remedial objectives for the Site.

### Alternative 2: No Action with Institutional/Engineering Controls

The No Action with Institutional/Engineering Controls would be both technologically feasible and cost-effective and achieve both short and long-term effectiveness. In addition, storm water controls are monitored both quarterly and annually under the oversight of TDEC-Division of Water Resources. As such, additional cost incurred may be primarily focused on monitoring, maintenance, and repair of

current and future engineering controls and site security. While this alternative may not completely address clean up and containment of known environmental containments, given the nature of the onsite business, implementation of institutional controls should provide an adequate level of protectiveness to onsite workers.

**PUBLIC PARTICIPATION**

Public notice was published in the Roane County News on (date). The Record of Decision will be viewable on the TDEC website at <https://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-remediation.html>.

**SELECTED ALTERNATIVE AND RATIONALE FOR SELECTION**

Alternative 2: No Action with Institutional/Engineering Controls, is selected as the appropriate remedial action. This alternative is expected to sufficiently reduce risks to human health and the environment and achieve remedial goals and compliance with applicable and relevant requirements.

**FINANCIAL ASSURANCE**

Other than timely payment of all fees invoiced by the State of Tennessee and continued adherence to any land use restrictions imposed, there is no anticipated financial assurance.

Issued by the Director of the Division of Remediation, Tennessee Department of Environment and Conservation on this \_\_\_\_ day of October 2020.

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James S. Sanders  
Director