

Appendix A – Chronology

- In February 2012, Huntington Alloys Corporation (Huntington Alloys) met with the West Virginia Department of Environmental Protection (WVDEP) to discuss assessing the solid waste management units (SWMUs) and areas of concern in the WVDEP's Voluntary Program as an alternative regulatory program to the United States Environmental Protection Agency Resource Conservation Recovery Act (RCRA) program. WVDEP subsequently agreed that Huntington Alloys will be allowed to enter the Voluntary Program based on the company's commitment to close the Monel Tank in 2013 and replace it with an aboveground storage system.
- In an April 2012 letter, the WVDEP requested the first phase RCRA Feasibility Investigation (RFI) Work Plan be completed at the Site. In the letter, the WVDEP explained that the first phase of the investigation would need to be completed prior to entering the Voluntary Program. The first phase of the investigation would include the SWMUs identified as Land-Based Units.
- In June 2012, Huntington Alloys submitted the Phase 1 RFI/Site Assessment Work Plan, and it was approved by the WVDEP in June 2012. The SWMUs identified as Land-Based Units (007, 008, 009, 010, 011, 012, and 016) and the SWMUs identified as the Spent Acid Plant Area (003, 004, 005, 006, 014, 017, 018, 019, 021, 022, 023, 024, 025, 026, and 033) were included in the Phase I Site Investigation. The SWMUs were identified from the preliminary review/visual Site inspection completed in 1991 and 1993 and supplemental RCRA Site visits and submittals.
- From October through December 2012, the field investigation was completed by assessing the subsurface conditions of the Land-Based Units and the Spent Acid Plant Area.
- In October 2012, Huntington Alloys received an email notification from the WVDEP that the Site was eligible for the Voluntary Program.
- In February 2013, Huntington Alloys submitted a memorandum (Project Update: Phase I RFI/Site Assessment Field Investigation at Huntington Alloys Corporation, 3200 Riverside Drive, Huntington, West Virginia, February 22, 2013) to the WVDEP. The objective of the memorandum was to serve as an interim summary prior to submitting a comprehensive report. As indicated in the memorandum, Huntington Alloys would submit a comprehensive report to the WVDEP at a later date, after completing the supplemental Site investigation.
- On March 13, 2013, the WVDEP submitted comments on the February 22, 2013 memorandum.
- On March 27, 2013, Huntington Alloys submitted the Voluntary Program application to the WVDEP.
- On April 9, 2013, the WVDEP submitted comments (via email) on the Voluntary Program application.
- On April 12, 2013, Huntington Alloys submitted a response to comments to the WVDEP on the March 13, 2013 letter.
- On May 10, 2013, Huntington Alloys submitted a response to comments to the WVDEP on the April 9, 2013 email. In addition, revised pages of the Voluntary Program application were included.
- On May 13, 2013, the WVDEP approved the Voluntary Program application. In the application, the WVDEP requested the submittal of draft versions of the Voluntary Remediation Agreement (VRA) and Public Notice. In addition, the WVDEP requested the establishment of a public repository and an initial Site visit.
- On June 12, 2013, Huntington Alloys submitted the draft VRA and the Public Notice via email. In the email, the initial Site visit was scheduled for June 18, 2013.
- On June 13, 2013, the WVDEP issued comments on the draft VRA and Public Notice.

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- On June 18, 2013, the WVDEP, Huntington Alloys, and Arcadis U.S., Inc. (Arcadis) met at Huntington Alloys to discuss the Voluntary Program and completed a Site tour.
- On June 28, 2013, Huntington Alloys submitted the revised VRA to the WVDEP.
- On August 22, 2013, the WVDEP issued additional comments on the VRA.
- On September 8, 2013, the WVDEP published a Public Notice that Huntington Alloys would be entering the Voluntary Program.
- In October 2013, the operation of the Monel Tank was discontinued and replaced with a new line operation.
- On January 13, 2014, the execution of the VRA was completed.
- On February 12, 2015, execution of the VRA Modification 1 was completed.
- On February 9, 2015, the WVDEP issued conditional approval on the Phase I Site Assessment Work Plan Addendum (Work Plan Addendum 1).
- On February 27, 2015, Huntington Alloys submitted a response to comments to the WVDEP on the Work Plan Addendum 1.
- On April 20, 2016, Huntington Alloys submitted the Phase I Site Assessment Summary Report.
- On June 2, 2016, execution of the VRA Modification 2 was completed.
- On June 7, 2017, Huntington Alloys submitted the Phase II Site Assessment Work Plan Addendum (Work Plan Addendum 2), and it was subsequently approved by the WVDEP on July 5, 2017.
- On June 28, 2017, execution of the VRA Modification 3 was completed.
- On November 28, 2018, execution of the VRA Modification 4 was completed.
- On March 27, 2019, Huntington Alloys submitted the Work Plan Addendum 3, and it was subsequently approved by the WVDEP on April 3, 2019.
- On January 21, 2020, execution of the VRA Modification 5 was completed.
- In April 2020, Huntington Alloys, the WVDEP, and Arcadis met via a conference call for the purpose of providing the WVDEP with an update on the preliminary groundwater analytical results from the off-Site wells that were installed in proximity of the Guyandotte River.
- On August 7, 2020, Huntington Alloys submitted the Phase II Site Assessment Work Plan Addendum (Work Plan Addendum 4), and it was subsequently approved by the WVDEP on August 10, 2020.
- On October 29, 2020, Consent Order Number 9856 was executed between the WVDEP (Division of Water and Waste Management) and Huntington Alloys. The Consent Order was initiated after Huntington Alloys received six deficiencies. All the deficiencies were resolved, except for one associated with the West Virginia/National Pollutant Discharge Elimination System, Outfall/Outlet 001.
- On April 21, 2021, a meeting was held between Huntington Alloys, Arcadis, and the WVDEP to discuss Site progress.
- On June 18, 2021, Huntington Alloys submitted the Supplemental Site Assessment Report 1, Revision 2, and it was subsequently approved by the WVDEP on June 30, 2021.
- On September 2, 2021, execution of the VRA Modification 6 was completed.
- On March 9, 2022, Huntington Alloys submitted the Work Plan Addendum 5, Revision 1, and it was subsequently approved by the WVDEP on March 10, 2022.

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- On September 22, 2022, a meeting was held between Huntington Alloys, Arcadis, and the WVDEP to discuss groundwater and surface interface concepts of the Guyandotte River and the proposed surface water and sediment locations.
- On January 26, 2023, Huntington Alloys submitted Amendment 2 to the Plan of Corrective Actions to further assess the steps of resolving the elevated metals in stormwater.
- On March 31, 2023, Huntington Alloys submitted the Work Plan Addendum 6 and received comments from the WVDEP on April 28, 2023.
- On July 5, 2023, Huntington Alloys submitted response to comments to the WVDEP on the Work Plan Addendum 6 and received additional comments on July 28, 2023.
- On August 18, 2023, Huntington Alloys submitted a second round of response to comments to the WVDEP on the Work Plan Addendum 6.
- On August 30, 2023, Huntington Alloys submitted the Work Plan Addendum 6, Revision 1, and it was subsequently approved by the WVDEP on August 30, 2023.
- On December 20, 2023, Huntington Alloys requested a 60-day extension of the submittal of the Supplemental Site Assessment Report 2, and the request was approved by the WVDEP on the same day.