

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

Interim Final 2/5/99

**RCRA Corrective Action**

**Environmental Indicator (EI) RCRIS code (CA725)**

**Current Human Exposures Under Control**

**Facility Name:** Motiva Enterprises LLC  
**Facility Address:** 2000 Wrangle Hill Road, Delaware City, Delaware 19706  
**Facility EPA ID #:** DED 00 232 9738

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

If yes - check here and continue with #2 below.

If no - re-evaluate existing data, or

If data are not available skip to #6 and enter "IN" (more information needed) status code.

**BACKGROUND**

**Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

**Definition of "Current Human Exposures Under Control" EI**

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

**Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

**Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Current Human Exposures Under Control  
Environmental Indicator (EI) RCRIS code (CA725)**

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”**<sup>1</sup> above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>Unk</u>	<u>Rationale / Key Contaminants</u>
Groundwater	<b>X</b>			<b>BTEX, MTBE, naphthalene, arsenic, antimony, barium, cadmium, lead.</b>
Air (indoors) <sup>2</sup>		X		No indoor structures above plume or impacted soils.
Surface Soil (e.g., <2 ft)		X		Any dermal exposure limited by worker Health and Safety procedures.
Surface Water		X		Monitored under NPDES permit.
Sediment			X	No significant human exposure to sediments.
Subsurf. Soil (e.g., >2 ft)		X		No human exposure.
Air (outdoors)		X		On-site exposure limited by NESHAPs.

\_\_\_\_\_ If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

**X** If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

\_\_\_\_\_ If unknown (for any media) - skip to #6 and enter “IN” status code.

**Rationale and Reference(s):** Groundwater - According to the RCRA Facility Investigation (RFI) Report (URS Dames & Moore, March 2000), there are several hydrocarbon plumes beneath the site, which have coalesced into one main plume. The plumes contain a free-phase component in some areas, with a larger dissolved phase component. On-site groundwater is not used for drinking water purposes, as the site relies on public water. The plumes do not come into contact with human receptors.

**Corrective Measures:** Free phase hydrocarbons are evacuated from 17 on-site wells on a once a month to a once a quarter basis, since February 2000. One well has a free phase skimming pump installed, with other wells scheduled for similar pump installation in 2003. A study to better define the dissolved hydrocarbon plume began in September 2002, and defined most of the boundaries. The final delineation phase should be completed in 2003. Soil and ground water impacted by the July 17, 2001 acid spill are currently being addressed under an EPA Unilateral Action Order (UAO). The areas impacted by the spill have been delineated. The main impact to soils was the lowering of soil pH and is mostly limited to the top two feet of soil in the spill area. Impacted soils are undergoing pH adjustment. The spill also lowered ground water pH in a limited area. Ground water monitoring of the spill area will continue as part of RCRA Corrective Action for the site, as the spill area will be designated as an Area of Concern. Human exposure for the spill area is limited to worker dermal exposure to soil (ground water is not used). Workers wear protective clothing as part of the Health and Safety procedures, therefore dermal exposures are avoided.

Footnotes:

<sup>1</sup> “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

<sup>2</sup> Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

**Current Human Exposures Under Control  
Environmental Indicator (EI) RCRIS code (CA725)**

Page 3

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

**Summary Exposure Pathway Evaluation Table**

Potential **Human Receptors** (Under Current Conditions)

<b><u>“Contaminated” Media</u></b>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food <sup>3</sup>
Groundwater	No	No	No	No	No	No	No
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment	No	No	No	No	Unknown*	No	No
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors’ spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“\_\_\_”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

       If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

  X   If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

       If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

**Rationale and Reference(s):** \_\_\_\_\_

<sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

\* See the indirect exposure pathway discussion regarding trespassers and sediment, under #4. Rationale.

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

Page 4

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**<sup>4</sup> (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

  X   If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

       If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

       If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

**Rationale and Reference(s):** Under a DNREC NPDES permit, Motiva discharges treated wastewater into an effluent channel that empties into the Delaware River. The condition of the channel sediments is not known at this time. The channel is located on, and is surrounded by, Motiva property. Workers do not routinely work in the channel or this area, however, the possibility that trespassers may enter the channel from the Delaware River to fish, crab or hunt is an exposure scenario that we must consider, although trespassing in this area is expected to be infrequent to nonexistent. Indirect exposure to any possible contamination may occur if a trespasser ingests fish or wildlife that has contamination from sediments in its tissue. Any exposure to trespassers by this route would be incidental and infrequent, and is not expected to pose a significant route of exposure to contamination at this site.

<sup>4</sup> If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**

Page 5

5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?

\_\_\_\_\_ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

\_\_\_\_\_ If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.

\_\_\_\_\_ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code

**Rationale and Reference(s):** \_\_\_\_\_

