

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

Interim Final 2/5/99

**RCRA Corrective Action**

**Environmental Indicator (EI) RCRIS code (CA750)**

**Migration of Contaminated Groundwater Under Control**

**Facility Name:** Pennzoil Wax Partner Co.  
**Facility Address:** Two Main Street, P.O. Box 415, Rouseville, PA 16344  
**Facility EPA ID #:** PAD 004 329 835

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, 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?

  X   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 "Migration of Contaminated Groundwater Under Control" EI**

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "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, GPRRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

**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).

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2. Is **groundwater** known or reasonably suspected to be “**contaminated**”<sup>1</sup> above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

  X   If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.

       If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”

       If unknown - skip to #8 and enter “IN” status code.

**Rationale and Reference(s):**

Acetone, Benzene, 2-Butanone, Toluene, Bis(2-chloroethyl)ether, Benzo(a)pyrene, Benzo(a)anthracene, Chrysene, Bis(2-ethylhexyl)phthalate, Di-n-octyl-phthalate, Fluoranthene, Benzo(b)fluoranthene, Antimony, Arsenic, Barium, Boron, Total chromium, Lead, and Selenium were detected in groundwater at concentrations above the Nonresidential-used (NR-U) aquifer Statewide Health Standards (SWHSs). Iron, Manganese, and Aluminum were detected in groundwater above their respective secondary maximum levels (MCLs) for drinking water.

A dissolved-phase plume of Toluene with concentration gradients was discovered downgradient from the former MEK dewaxing plant. All other analytes exceeding the SWHSs were detected throughout the site with no obvious sources.

Benzene, Toluene, and Barium were detected in the deep unconsolidated wells at concentrations above the NR-U SWHSs. Iron and Manganese were detected in the deep unconsolidated wells above their respective secondary maximum levels (MCLs) for drinking water.

Monitoring well samples were collected and analyzed to identify the products that are present in the separate-phase liquid (SPL) found throughout the site. The products identified are cutting/motor oil, Stoddard solvent, #2 fuel oil, #6 fuel oil, Kerosene, Gasoline, Transmission fluid, and Hydraulic/gear lube oil. The plumes (including SPL and Toluene) have historically ranged from Non-detect (ND) to 9.74 feet in thickness.

\* source: *Site Characterization Report-Former PQS Rouseville Refinery Plant 1 January 8, 2004*

<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 appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is

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expected to remain within “existing area of contaminated groundwater”<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?

- If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the “existing area of groundwater contamination”<sup>2</sup>).
- If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the “existing area of groundwater contamination”<sup>2</sup>) - skip to #8 and enter “NO” status code, after providing an explanation.
- If unknown - skip to #8 and enter “IN” status code.

**Rationale and Reference(s):**

Continual operation of a petroleum hydrocarbon recovery system contains the movement of the SPL in Plants 1&2. This reduces the potential for SPL discharge to Oil Creek or Cherry Run. Manual product recovery continues to be performed at designated wells at Plants 1&2.

Total fluids recovery with soil vapor extraction is being performed on the Toluene plume located in the former MEK Plant area. This system has just become operational after a pilot test showed this was the most viable method for remediation.

\* source: *Petroleum Hydrocarbon Recovery Systems Fourth Quarter 2003 Update January 2004*

<sup>2</sup> “existing area of contaminated groundwater” is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of “contamination” that can and will be sampled/tested in the future to physically verify that all “contaminated” groundwater remains within this area, and that the further migration of “contaminated” groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4. Does “contaminated” groundwater **discharge** into **surface water** bodies?

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  X   If yes - continue after identifying potentially affected surface water bodies.

       If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

       If unknown - skip to #8 and enter "IN" status code.

**Rationale and Reference(s):**

Monitoring suggests that dissolved-phase constituents may enter the surface water from the groundwater. Potentially affected surface water bodies include Oil Creek and Cherry Run.

\* source: *Site Characterization Report-Former PQS Rouseville Refinery Plant 1 January 8, 2004*

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5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater “level,” and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

  X   If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

       If no - (the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations<sup>3</sup> greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

       If unknown - enter “IN” status code in #8.

**Rationale and Reference(s):**

The Department of Environmental Protection’s (DEPs) PENTOXSD model was used to evaluate the significance of the dissolved-phase constituents entering the surface water. There is limited opportunity for dispersion or attenuation due to proximity to Oil Creek and Cherry Run, so maximum concentrations detected in each on-site portion were used to evaluate worst-case scenarios. Three specific tests were run to determine worst-case scenarios from specific plumes: Toluene Plume model, Cherry Run model, and Site-wide model.

The model results showed that the Toluene Plume area maximum concentrations were below the water quality-based effluent limits (WQBELs), and therefore do not pose a threat to water quality. The model also shows that the Cherry Run 95 percent upper confident level (UCL) concentrations and the Site-wide 95 percent UCL concentrations were below the water quality-based effluent limits (WQBELs), and therefore do not pose a threat to water quality. The model conducted for Cherry Run considered potential discharges from the North and South.

\* source: *Site Characterization Report-Former PQS Rouseville Refinery Plant 1 January 8, 2004*

<sup>3</sup> As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?

  X   If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,<sup>5</sup> appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

\_\_\_\_\_ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

\_\_\_\_\_ If unknown - skip to 8 and enter “IN” status code.

**Rationale and Reference(s):**

See rationale for previous question.

<sup>4</sup> Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

<sup>5</sup> The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the “existing area of contaminated groundwater?”

  X   If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the “existing area of groundwater contamination.”

       If no - enter “NO” status code in #8.

       If unknown - enter “IN” status code in #8.

**Rationale and Reference(s):**

Continual operation of a petroleum hydrocarbon recovery system contains the movement of the SPL in Plants 1&2. This reduces the potential for SPL discharge to Oil Creek or Cherry Run. Manual product recovery continues to be performed at designated wells at Plants 1&2. Associated with this, quarterly monitoring reports are submitted and reviewed by the EPA and DEP. This engineering control and monitoring will remain operational until SPL has been removed to the maximum extent practicable or until a new remediation approach is implemented.

\* source: *Site Characterization Report-Former PQS Rouseville Refinery Plant 1 January 8, 2004*

