

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750) Migration of Contaminated Groundwater Under Control

Facility Name: Lemean Property Holdings (Formerly Keystone)
Facility Address: 8281 Route 873, Slatington, PA 18080
Facility EPA ID #: PAD 045 137 247

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, GPRR). 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”¹ 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):

Sixteen groundwater samples (plus two duplicates) were collected for each sampling event in 2004 and 2005: four permanent monitoring wells (MW-1, MW-2, MW-3, and MW-3 DUP); two production wells (PWS-2 and PWS-4); five temporary well point installations (TEMP-1UST-1, TEMP-2UST-1, TEMP-EP-1, TEMP-SP-1, TEMP-MW-5); and five upgradient residential wells, including one duplicate (RWS-1, RWS-1 DUPE, RWS-2, RWS-3, and RWWS-4). In addition to the onsite sampling wells, four residential wells located upgradient from the facility were also sampled in 2004.

Only one residential well slightly exceeded EPA manganese secondary maximum contaminant level (SMCLs) of 50 ug/L with a detection level of 63 ug/L. EPA does not enforce secondary maximum contaminant levels. These levels are established only as guidelines to assist public water systems in managing their drinking water for aesthetic considerations, such as taste, color and odor. These contaminants are not considered to present a risk to human health. More importantly, the manganese level detected at the residential well is below EPA Region III Risk Based concentration of 730 ug/L, which is the standard established to protect the public against consumption of constituent levels that present a risk to human health. Aside from the one exceedance for manganese all other constituents of concern for the residential wells were below EPA and PADEP drinking water standards.

In 2004, elevated levels of aluminum, which is also a secondary drinking water constituents, were detected in all the onsite wells. The aluminum levels for the permanent wells exceeded EPA standards of 50 ug/L but were well below PADEP Used Aquifer standard of 200 ug/L. In addition to aluminum, the production wells also exceeded secondary drinking water standards for iron and manganese. These contaminants at the detected levels do not present a human health risk.

During the 2004 sampling event several primary metal constituents exceeded drinking water standards in the temporary monitoring wells but not in the permanent wells. In 2005, the wells were re-sampled for the selected primary metal constituents to evaluate the anomaly. The confirmatory groundwater samples identified that the difference in metal detections during the 2004 sampling event was the result of unfiltered samples, which caused an analytical interference. None of the wells sampled in 2005 exceeded EPA and PADEP drinking water standards for the selected primary metal contaminants.

In 2005, only one well slightly exceeded the regulatory standard for TCE. The well detected 7.2 ug/L of TCE and is located within the facility property line. (2004 and 2005 RCRA Corrective Action Site Investigation Reports)

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Constituents of Concern	EPA/PADEP Stds.	Concentrations (ug/L)
1,1-Dichloroethylene	7	ND
cis-1,2-Dichloroethylene	70	ND - 0.46
Toluene	1000	ND - 0.27
trans-1,2-Dichloroethene	100	ND
Trichloroethylene	5	ND - 7.2
Vinyl chloride	2	ND
Arsenic	10	ND - 4.5
Beryllium	4	ND
Cadmium	5	ND
Chromium	100	ND
Lead	5	ND
Nickel	100	ND - 7.4

Footnotes:

¹“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).

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within “existing area of contaminated groundwater”² as defined by the monitoring locations designated at the time of this determination)?

- X 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”²).
- If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the “existing area of groundwater contamination”²) - 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):

The Lehigh River is located approximately half a mile downgradient of the facility. It is a point of discharge for groundwater. There are no receptors between the facility and the River. Several surface water locations were sampled along the River. The surface water results indicate extremely low levels to non-detects for the constituents of concern. The River has not been impacted from current and past activities at the facility. Based on the groundwater and surface water results EPA and PADEP conclude that the groundwater plume is stabilized between the facility and the Lehigh River. (2004 and 2005 RCRA Corrective Action Site Investigation Reports)

² “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.

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

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

 X 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):

Several surface water locations were sampled along the Lehigh River. The surface water results indicate extremely low levels to non-detects for the constituents of concern. The River has not been impacted from current and past activities at the facility.

In addition, the PADEP PENTOXSD model was conducted to determine if onsite contaminant levels can potentially impact the Lehigh River. The results of the model concluded that the onsite contaminant levels will not impact the River. Historic onsite TCE concentrations have been well below the model predicted minimum concentration of 3,505 ug/L that poses a potential impact to the Lehigh River. (2005 RCRA Corrective Action Site Investigation Report)

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5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration³ 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)?

_____ If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ 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 concentration³ 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 concentrations³ 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):

³ 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 implemented⁴)?

_____ 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,⁵ 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):

⁴ 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.

⁵ 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?”

_____ 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):

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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

 X YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the **Lemean Property Holdings (Formerly Keystone)** facility, EPA ID # **PAD 045 137 247**, located at **8281 Route 873, Slatington, PA 18080**. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

 NO - Unacceptable migration of contaminated groundwater is observed or expected.

 IN - More information is needed to make a determination.

Completed by (signature) _____ Date 6/29/05
 (print) Khai M. Dao
 (title) RCRA Project Manager

Supervisor (signature) _____ Date 6/29/05
 (print) Paul Gotthold
 (title) Branch Chief, RCRA Corrective Action, PA Operations
 (EPA Region or State) Region III

Locations where References may be found:

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