DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: **Morco, Inc. (a.k.a. Morco Corporation, Coinco)**
Facility Address: **High Street, Cochranton, PA 16314**
Facility EPA ID #: **PAD 05 688 2822**

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 #8 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, GPRA). 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).

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): An investigation was conducted to evaluate the groundwater at the facility. The investigation entailed 52 soil borings along with six nested monitoring wells and one upgradient well to delineate the groundwater contamination. Below are the concentrations detected in groundwater prior to the implementation of the pump and treat system.

Constituents	Concentrations (ppb)
toluene	ND - 72
1,1-dicholroethylene (DCE)	ND - 21
cis-1,2-dichloroethylene (DCE)	ND - 2800
trans-1,2-dichloroethene (DCE)	ND - 38
tetrachloroethylene (PCE)	ND - 48
trichloroethylene (TCE)	ND - 56,000
1,1,1- trichloroethane (TCA)	ND - 11
1,1,2-TCA	ND - 27
vinyl chloride	ND - 160
	(ND: non-detect)

Three recovery wells were installed to treat the groundwater and control potential plume migration. After six years of pump and treat, the concentrations and plume size have decreased significantly. Below are the recent concentrations for the listed constituents. (Annual Reports Prepared by Moody & Associates, Inc., PADEP Consent Order and Agreement, PADEP Environmental Indicator Report)

Constituents	Concs. (ppb)	Constituents	Concs. (ppb)
toluene	ND	PCE	ND - 5
1,1- DCE	ND	1,1,1-TCA	ND
cis-1,2-DCE	ND - 1500	1,1,2-TCA	ND
trans-1,2- DCE	ND - 34	TCE	ND - 440
vinyl chloride	ND - 12		

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).

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): In 2001, the PADEP modified the existing Consent Order and Agreement to temporarily discontinue the pump and treat system with qualifying requirements. Pursuant to the modified Order, in 2002 Morco initiated the first of eight (8) consecutive quarters of groundwater monitoring for the former concrete pad and surface impoundment areas. During the eight (8) quarters of sampling, if MW-6D, the further most downgradient well, show an increase in concentrations, which suggest that the plume may be migrating offsite, Morco will re-start the system to control the migration. However, if after eight (8)quarters of sampling and the groundwater results indicate that the plume is not migrating offsite, Morco will not be required to re-start the pump and treat system. At such time, the frequency of the groundwater monitoring will change from quarterly to annual sampling. As a contingency plan, the pump and treat system will remain in place in the event that the groundwater plume may migrate offsite. The decision to restart the system will be based on the annual groundwater results. If the results of the annual sampling exceed 5 ppb for TCE or exceed the statewide health standard for the constituents of concern, Morco will collect additional groundwater samples the following quarter. If the sample results from that quarter show an exceedence, Morco will restart the pump and treat system. However, if the sample results do not exceed the regulatory standards, Morco will not be required to re-start the pump and treat system. Instead, annual groundwater monitoring will resume.

After three quarters of sampling, the results indicate that the groundwater plume is contained and stabilized within the facility property lines. The facility will continue to monitor the designated well pursuant to PADEP Consent Order to assure that the plume continues to be stabilized within the facility property lines.

In addition to the above groundwater sampling and outside the scope of the modified PADEP Consent Order, EPA has requested at least four (4) additional consecutive quarters of groundwater sampling for well TW-1located directly downgradient from the pre-RCRA solid waste unit. The results from the four consecutive quarters indicate non-detects for the constituents of concern.*(Annual Reports Prepared by Moody & Associates, Inc., PADEP Consent Order and Agreement, PADEP Environmental Indicator Report, EPA letter to Morco, February 22, 2002, Moody & Associates result letters (4/02 and 8/02) to EPA.)*

[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.

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): French Run Creek, which is located approximately one and a half mile northwest of the facility, is not impacted from the groundwater plume detected at the facility. The plume is contained within the facility property lines and does not discharge to the nearby surface water body.

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] 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)?

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_____ 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[3] 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[3] 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[3] 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.

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[4])?

_____ 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.

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): The facility will continue to monitor the designated well pursuant to PADEP Consent Order to assure that the plume continues to be stabilized within the facility property lines. ***(PADEP Consent Order and Agreement)***

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

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 **Morco, Inc. (a.k.a. Morco Corporation, Coinco)** facility, **EPA ID # PAD 05 688 2822**, located at **High Street, Cochranton, PA 16314**. 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: 08-27-02
(print) Khai M. Dao
(title) Remedial Project Manager

Supervisor: (signature) _____ Date: 08-27-02
(print) Paul Gotthold
(title) PA Operations Branch Chief
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Locations where References may be found:

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