

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: IBM-Owego (Lockheed-Martin Federal Systems)
Facility Address: Route 17C, Owego, New York
Facility EPA ID #: NYD986874501

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?
- 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 groundwater 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?

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

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

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

Ratio nale and Reference(s): A groundwater monitoring program has been in place for over fifteen years. Current program includes sampling and analysis for site specific parameters and the collection of water level measurements at 142 monitoring wells. Sampling and analysis is performed quarterly at critical locations and semi-annually / annually at other locations.

Constituents of concern are Volatile Organic Contaminants (VOCs), primarily Trichloroethylene, 1,1,1-Trichloroethane and associated breakdown products. Currently, maximum concentration for total VOCs is approximately 50,000 ppb in the source area. This is a significant reduction from historical total VOC concentrations of approximately 500,000 ppb.

References:

1. RCRA Facility Investigation Task I Report - Description of Current Conditions, July 1992.
2. RCRA Facility Assessment - Final Report, August 1993.
3. Groundwater Monitoring Program Annual and Semi-Annual Reports (submitted in February and August of each year).
4. 6NYCRR 373-2 Hazardous Waste Management Permit (Permit # 7-4930-00016/00074-0).

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 groundwater recovery system is currently in operation at three separate areas on-site. Total combined recovery has averaged 274 gallons per minute for the most recent year of data. Data presented in the groundwater monitoring reports (annual and semi-annual) indicate that hydraulic containment is being achieved (see attached figure).

References:

5. RCRA Facility Investigation Task I Report - Description of Current Conditions, July 1992.
6. RCRA Facility Assessment - Final Report, August 1993.
7. Groundwater Monitoring Program Annual and Semi-Annual Reports (submitted in February and August of each year).
8. 6NYCRR 373-2 Hazardous Waste Management Permit (Permit # 7-4930-00016/00074-0).

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 waterbodies.

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

Rationale and Reference(s): The collection of several surface water samples from Bames Creek indicated a maximum of 2 ppb of 1,1,1-Trichloroethane and 1 ppb of methylene chloride, which is below the groundwater standards. These two samples were collected in close proximity to a groundwater contamination source area (on-site). Samples collected a short distance down stream (still on-site) indicated that VOCs were not detected at a detection limit of 1 ppb.

References:

9. RCRA Facility Investigation Task I Report - Description of Current Conditions, July 1992.
10. RCRA Facility Assessment - Final Report, August 1993.
11. Groundwater Monitoring Program Annual and Semi-Annual Reports (submitted in February and August of each year).
12. 6NYCRR 373-2 Hazardous Waste Management Permit (Permit # 7-4930-00016/00074-0).

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 specialist, 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.

Ratio nale and Re feren ce(s): Groundwater recovery operations and the groundwater monitoring program are required by the 373-2 Hazardous Waste Management Permit. The current groundwater recovery operation and the groundwater monitoring program will continue to be required under the Permit. (Minor modifications to the program may be implemented with Department approval.)

References:

13. RCRA Facility Investigation Task I Report - Description of Current Conditions, July 1992.
14. RCRA Facility Assessment - Final Report, August 1993.
15. Groundwater Monitoring Program Annual and Semi-Annual Reports (submitted in February and August of each year).
16. 6NYCRR 373-2 Hazardous Waste Management Permit (Permit # 7-4930-00016/00074-0).

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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA 750), 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).

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 IBM-Owego (Lockheed-Martin Federal Systems) facility, EPA ID # **NYD986874501**, located at **Route 17C, Owego, New York**. 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: January 25, 2002
(print) Denise Radtke
(title) Engineering Geologist II

Supervisor (signature) _____ Date: January 25, 2002
(print) Paul J. Merges, Ph.D.
(title) Director, Bureau of Radiation and Hazardous Waste Management
(EPA Region or State) EPA Region II - New York State Department of Environmental Conservation

Locations where References may be found:

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