DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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

Facility Name: Von Roll Isola USA, Inc. (VRI) (aka General Electric Riverview Facility)
Facility Address: One West Campbell Road, Schenectady, New York
Facility EPA ID #: NYD052987096

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.

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 RCRA Info national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

Background

The Von Roll Isola/GE Riverview facility is a 22-acre manufacturing facility located on West Campbell Road in the Town of Rotterdam, New York. The facility is owned and operated by Von Roll Isola USA Inc. (VRI) and produces solid and liquid insulating materials and tapes for the electrical industry. General Electric Company (GE) originally purchased the property in 1942. From 1942 to 1959, GE used the site as a radar development facility. In 1960, the Insulating Materials Incorporated (IMI) group was moved from the nearby GE Main Plant facility to the Riverview site. IMI produced electrical insulation products similar to that of the previous GE operation. In March 1988, GE sold the plant to the recently created company, Insulating Materials Incorporated (IMI). The facility was subsequently sold to VRI in 1995.

The facility consists of several buildings on 22-acres situated on a high plateau approximately 80 feet in elevation above the Mohawk River flood plain. The production area is fenced and gated and is routinely patrolled by facility security personnel. The facility is bounded on the north by a steep embankment and an active Delaware & Hudson (D&H) Railroad rail line, the D&H rail line and Rotterdam Square Mall to the west, Campbell Road to the south, and residential areas to the east. A major industrial facility, the General Electric Main Plant, is located immediately to the north of the site. (See Site Location Map)

The site contains numerous solid waste management units (SWMUs) and former hazardous waste storage and disposal areas. A New York State Department of Environmental Conservation (NYSDEC) 1992 Resource Conservation and Recovery Act (RCRA) Facility Assessment Report identified 32 SWMUs and three areas of concern (Reference 6). Numerous spills have occurred at the plant and, in conjunction with plant operations, have resulted in several areas of subsurface soil and groundwater contamination. Some areas have been closed under the RCRA corrective action program, others remain to be fully investigated and remediated under the NY State Inactive Hazardous Waste Remediation program. Historical sampling of groundwater, soils, and seep outbreaks at the site have indicated the presence of organic solvents and petroleum products at the site. (See Site Map - RI Plate 1)

The NYSDEC has determined that the site is an inactive hazardous waste disposal site, as that term is defined at Environmental Conservation Law Section 27-1301.2, and presents a significant threat to the public health or environment. The site has been listed in the *Registry of Inactive Hazardous Waste Disposal Sites in New York State* as site Number 4-47-005, classification 2.

A NYSDEC Part 373 RCRA Permit was issued to the facility on September 28, 1993 and regulated the hazardous waste container storage area. The facility converted to a less than 90-day storage facility in 1994 (Reference 4).

Quantities of liquid and solid raw materials, products, and intermediates are currently stored at the facility. The facility is currently operating as a less than 90-day storage facility for hazardous waste generated on-site. Wastes are stored in tanks and in 55-gallon drums in Building RV-42 and routinely disposed off-site (Reference 1).

There is currently no disposal of hazardous waste or mixed waste at the facility. Furthermore, there are no private production wells for potable or service water on-site. No known wells are used for domestic consumption in the immediate vicinity of the site, since area residences are all served by a municipal water system.

Several investigations have been completed at the facility, including a 1993 Site Investigation and a 1998 Summary Report of the Riverview Facility Schenectady, New York. Early investigations were conducted under the terms of a 1992 Administrative Order on Consent with the NYSDEC. General Electric and the NYSDEC entered into a new Order on Consent for an Remedial Investigation and Feasibility Study (RI/FS) on June 6, 2001. The new order includes elements regarding the inactive hazardous waste program and the RCRA Corrective Action program. A first phase of the RI/FS has been completed and additional investigations are planned for the Fall of 2006. (Reference 1, 7).

References:

1. *Remedial Investigation Report.* Von Roll Isola USA Inc. Facility. Conestoga-Rovers Associates, August 2002.
4. *NYSDEC 6 NYCRR Part 373 Hazardous Waste Management Facility Permit for the Von Roll Isola USA Facility, Rotterdam, New York.* New York State Department of Environmental Conservation, 1993. EPA I.D. Number: NYD052987096, NYSDEC Permit.
6. *RCRA Facility Assessment Report for the Insulating Materials, Inc. Riverview Plant.* Environmental Protection Agency. A.T. Kearney, August 1992.
7. *Administrative Order on Consent #A4-0363-9802.* New York State Department of Environmental Conservation. February 1998.

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:

Groundwater investigations have been performed at the VRI facility on several occasions, most recently in 2001 and 2002 during the first phase Remedial Investigation (RI) conducted by Conestoga-Rovers for General Electric Company. A total of twenty-seven (27) monitoring wells currently exist and have been

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[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).

periodically sampled. Results in exceedance of Title 6 of the New York Code of Rules and Regulations (NYCRR) Part 703.5 quality standards for groundwater and drinking water are summarized in the table below. Complete information on where contamination was detected, and at what concentrations, can be found in References 1, 2, and 3.

Unconsolidated deposits underlying the facility consist of glaciolacustrine and deltaic sands and silts. A clay confining unit approximately 11 feet thick was noted in deep borings at 95 feet below ground surface. Below this unit, a deep water bearing zone of silty sands and clay was noted to a depth of at least 122 feet. Regional information indicates the presence of a dense glacial till unit overlying black and gray shales and sandstones.

The VRI facility lies in a recharge zone for the Great Flats/Schenectady Aquifer located to the north of the site within the Mohawk River basin. Municipal well fields for the City of Schenectady and Town of Rotterdam, New York are located in the eastern portion of the aquifer approximately one mile northwest of the site. A regional groundwater divide trending north to south has been confirmed in studies at the adjacent General Electric Main Plant facility to the north. Groundwater flow east of the divide is northeast to the Mohawk River. Groundwater flow west of the divide is to the northwest, toward the municipal well fields. Flow from the GE Main Plant is east of the divide and thus, does not flow to the municipal wells. The groundwater divide has not been confirmed as extending onto the VRI facility. However, preliminary information from the first phase RI indicates the flow is generally to the north and northeast and would be on the eastern side of the groundwater divide once it reaches the flood plain to the north. (References 1, 3, and 5 and RI Figure 2.6 Groundwater Contours).

Groundwater at the facility is observed in unconsolidated deposits under unconfined/water table conditions. Depth to groundwater is approximately 60 to 70 feet below ground surface across the site. Groundwater flow is to the north/northeast toward the steep hillside on the north boundary of the site. (Reference 1).

Data collected to date indicates groundwater contamination is primarily associated with SWMU 18 - (the Former Building RV-33 Tank Farm area), and contamination in areas near Building RV-14. The majority of the contaminants detected are associated with a deep petroleum spill located adjacent to the main manufacturing building (RV-14) and deep soil contamination in the area of the Building RV-33 tank farm. Sporadic hits of low level trichloroethene contamination (9 to 26 ug/l or parts per billion, ppm) have been found near Building RV-14, the northern site perimeter, and in a presumed upgradient location on the south side of the plant. A definite source has not been determined for this contamination.

Groundwater Results Above Standards

Contaminant	Wells Sampled/ Wells Standards Exceeded	Max. Concentration (ppb)/Location	NYS Groundwater Standard (ppb)
benzene	27/5	1,200 / GT-1	1
ethylbenzene	27/4	160,000 / GT-1	5
toluene	27/3	350 / GT-1	5
xylene	27/5	6,300 / GT-9	5

Contaminant	Wells Sampled/ Wells Standards Exceeded	Max. Concentration (ppb)/Location	NYS Groundwater Standard (ppb)
trichloroethylene	27/3	26 / GT-16	5
1,2,4-trimethylbenzene	27/3	2,590 / GT-13	5
1,3,5-trimethylbenzene	27/2	1,690 / GT-9	5
isopropyl benzene	27/3	146 / GT-9	5
n-propylbenzene	27/3	940 / VRI-1	5
phenol	27/3	32 / GT-14	1
2,4-dimethylphenol	27/2	3.1 / GT-9	1
naphthalene	27/3	130 / VRI-8	10
1,2,3-trichloropropane	27/1	2,880 / GT-13	5

There is no on-site groundwater usage, and there are no identified targets or receptors located downgradient of the facility. Local residents are served by a municipal water supply system. The closest well used for drinking water purposes is located more than 3,500 feet downgradient from the site. A municipal water system provides potable water and production water to the site. There is no crop, meat or dairy production using groundwater in the vicinity of the facility. Groundwater contamination does not appear to be migrating off-site and thus does not affect the quality of the Mohawk River, hence preventing human exposure to contamination in site groundwater via consumption of fish taken from the river.

References:

1. *Remedial Investigation Report.* Von Roll Isola USA Inc. Facility. Conestoga-Rovers Associates, August 2002.
2. *Summary Report Riverview Facility Schenectady, New York.* Von Roll Isola USA, Inc. O'Brien & Gere Engineers, July 1998.
3. *Field Investigation Report, Former General Electric Riverview Plant Schenectady, New York.* General Electric Company - Silicones Division. Groundwater Technology, Inc. January 1993.
5. *Revised Remedial Investigation Report, GE Main Plant, Schenectady, New York.* GE Energy. URS Corporation. May 2004.

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:

Data to date does not indicate a significant off-site migration component. Investigations indicate the groundwater at the facility is not in direct hydraulic connection with aquifers to the north that are used for drinking water. An extensive low permeability geologic unit underlies the site at a depth of 95 feet, below the level of significant contamination detected. Hydraulic data indicates a perched condition in the local groundwater, with potential discharge, if any (though none has been noted since 1992), to the ground surface and the escarpment to the north of the facility (References 1 and 2).

Intensive groundwater investigations conducted at an adjacent and immediately downgradient industrial facility since 1995 (GE Main Plant Facility, Reference 5) do not indicate upgradient or off-site sources of contamination. Wells at that facility were sited near the base of the escarpment for the purpose of determining any potential contribution to groundwater contamination from the VRI facility. While contamination has been detected in on-site wells in excess of NYS standards and guidance values, the results are generally sporadic or infrequent and highly localized to areas of deep soil contamination. No organized or significant plume has been detected. Groundwater samples collected from monitoring wells installed near the facility but outside the perimeter of the known process areas have not indicated site-related contaminants of concern in excess of New York State groundwater SCGs (References 1,2,3). Comparison of results from earlier investigations in 1992 and recent studies completed in 2002 do not indicate a significant change in the geographic distribution of contaminants. Additional characterization of groundwater, focusing primarily on the extent of potential trichloroethene contamination near Building RV-14, is anticipated to take place during the Fall of 2006 or Spring of 2007.

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[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.

References:

1. *Remedial Investigation Report.* Von Roll Isola USA Inc. Facility. Conestoga-Rovers Associates, August 2002.
2. *Summary Report Riverview Facility Schenectady, New York.* Von Roll Isola USA, Inc. O'Brien & Gere Engineers, July 1998.
3. *Field Investigation Report, Former General Electric Riverview Plant Schenectady, New York.* General Electric Company - Silicones Division. Groundwater Technology, Inc. January 1993.
5. *Revised Remedial Investigation Report, GE Main Plant, Schenectady, New York.* GE Energy. URS Corporation. May 2004.

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:

There are no surface water bodies or streams located on the VRI property. A seep was reported in previous investigations emanating from the steep escarpment off the site property to the north. Low concentrations of phenol were noted in a sample taken from the seep in 1993. This seep has not been subsequently observed, located, or sampled. Sampling of the Poentic Kill, a stream located off-site to the north of the site at the base of the escarpment, was conducted during the 1992 field investigation. (Reference 3). No contaminants attributable to the VRI facility were found. Numerous sampling events of surface water and sediment in surface water bodies on the adjacent GE Main Plant Facility, including the above-mentioned Poentic Kill, have not revealed an upstream source of contamination attributable to the VRI facility (Reference 5). Surface flow and storm waters at the site are controlled and managed through storm sewers and basins. (References 1 and 3).

References:

1. *Remedial Investigation Report.* Von Roll Isola USA Inc. Facility. Conestoga-Rovers Associates, August 2002.
3. *Field Investigation Report, Former General Electric Riverview Plant Schenectady, New York.* General Electric Company - Silicones Division. Groundwater Technology, Inc. January 1993.
5. *Revised Remedial Investigation Report, GE Main Plant, Schenectady, New York.* GE Energy. URS Corporation. May 2004.

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

[3]As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g.,

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 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:

N/A. See discussion and references for #3 and 4, above.

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

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hyporheic) zone.

[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.

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:

N/A. See discussion and references for #3 and 4, above.

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 "area of groundwater contamination."

_____ If no - enter "NO" status code in #8.

_____ If unknown - enter "IN" status code in #8.

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[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.

Rationale:

The 1998 RI/FS Administrative Order on Consent with General Electric requires a full Remedial Investigation and Feasibility Study be performed to the satisfaction of the NYS Department of Environmental Conservation. A first phase investigation has been completed. GE has committed to additional focused investigations to further define soil contamination (to support remedial alternative analysis) and additional groundwater monitoring to determine the full extent of trichloroethene contamination (particularly in the presumed upgradient portions of the site) and to support an indoor air/vapor intrusion evaluation for Building RV-14. Additional work is anticipated to begin in the Fall of 2006.

8. Check the appropriate RCRAInfo 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 **Von Roll Isola USA Facility (aka General Electric Riverview Facility)** facility, EPA ID # **NYD052987096** ,located at **1 West Campbell Road, Schenectady, 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: _____ Date: 09/29/06
Martin D. Brand
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Supervisor: _____ Date: 9/29/06
Michael Komoroske, P.E.
Remedial Section C, Remedial Bureau D
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Edwin Dassatti, P.E.
Bureau of Hazardous Waste & Radiation Management
Division of Solid & Hazardous Materials

References:

1. *Remedial Investigation Report.* Von Roll Isola USA Inc. Facility. Conestoga-Rovers Associates, August 2002.

2. *Summary Report Riverview Facility Schenectady, New York.* Von Roll Isola USA, Inc. O'Brien & Gere Engineers, July 1998.

3. *Field Investigation Report, Former General Electric Riverview Plant Schenectady, New York.* General Electric Company - Silicones Division. Groundwater Technology, Inc. January 1993.

4. *NYSDEC 6 NYCRR Part 373 Hazardous Waste Management Facility Permit for the Von Roll Isola USA Facility, Rotterdam, New York.* New York State Department of Environmental Conservation, 1993. EPA I.D. Number: NYD052987096, NYSDEC Permit.

5. *Revised Remedial Investigation Report, GE Main Plant, Schenectady, New York.* GE Energy. URS Corporation. May 2004.

6. *RCRA Facility Assessment Report for the Insulating Materials, Inc. Riverview Plant.* Environmental Protection Agency. A.T. Kearney, August 1992.

7. *Administrative Order on Consent #A4-0363-9802.* New York State Department of Environmental Conservation. February 1998.

Figures
Site Location Map (Figure 1)
Facility Map (RI PLATE1)
Groundwater Contours (RI Figure 2.6)

Locations where References may be found:
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