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: **US Army Garrison Adelphi Laboratory Center**
Facility Address: 2800 Powder Mill Road, Adelphi, MD 20783-1197
Facility EPA ID #: MD8 213 822 762

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 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).

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

1. 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 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):

The current Site contamination consists of a groundwater (GW) plume with trichloroethylene (TCE) and cis-1,2-dichloroethylene (cDCE) levels that exceed Drinking Water maximum contaminant levels (MCLs). The plume migrated onto the Adelphi Laboratory Center (ALC) property from older releases on the former Naval Surface Warfare Center-White Oak installation (NSWC-WO) that was located adjacent to ALC. Older studies showed small amounts of contamination in certain sections of streams but not at levels considered unacceptable to human health.

Since the early 1970's, Adelphi Laboratory Center (ALC) was removing a non-PCB containing petroleum distillate fluid from groundwater in the Building 500 Area. The petroleum distillate was captured in an oil/water separator, and then removed, while clean groundwater was discharged to Paint Branch Creek. This system was permitted under a MDE NPDES permit. The system was shut down in late 2000 with MDE's approval when groundwater had finally met the clean-up goal.

References:

(1) USN Naval Surface Warfare Center-White Oak 2005 Record of Decision (CERCLA ROD) for OS-9, September 28, 2005;

(2) 2016 Basewide Long-Term Monitoring Report (Final) for Former Naval Surface Warfare Center-White Oak, Silver Spring, MD, October 2017 by CH2M.

(3) Adelphi Laboratory Center Installation Action Plan, February 2000.

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).

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

2. 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)?

☒ 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 chlorinated solvent groundwater plume was actively treated by pumping/air stripping and bioremediation by injecting sodium lactate and emulsified vegetable oil. The plume footprint is substantially reduced and natural attenuation will continue to shrink the plume,

The Building 500 area groundwater was treated by source removal (346 tons of oil-contaminated soil) and by natural flushing of groundwater into an oil/water separator, where the oil was removed and clean GW discharged to Paint Branch Creek under a Maryland Department of the Environment (MDE) NPDES permit. In late 2000, groundwater met the clean-up goal and treatment ceased under MDE's approval.

References: See Page 2, #1.

[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.

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

3. Does "contaminated" groundwater **discharge** into **surface water** bodies?

☒ 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:

According to the Responsiveness Summary in the 2005 Record of Decision (CERCLA) for OU-9 at Naval Surface Warfare Center–White Oak, low level cVOCs were found in Paint Branch Creek. However, these cVOCs, primarily TCE, were found in a very limited segment of the Creek at acceptable levels in regard to human health exposures. However, once active treatment of groundwater was installed, contaminant levels in surface water declined and it is no longer monitored.

References:

(1) USN Naval Surface Warfare Center–White Oak, Silver Spring, MD Record of Decision (ROD) for OU 9, September 28, 2005;

(2) 2016 Basewide Long-Term Monitoring Report (Final) for Former Naval Surface Warfare Center-White Oak, Silver Spring, MD, October 2017 by CH2M.

(3) Long Term Monitoring Report #5, Sampling Event at the Building 500 and Site 8 Areas– June 200, by US Army Engineer District, Baltimore.

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

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)?

☒ 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 judgment/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):

According to the Responsiveness Summary in the 2005 Record of Decision (CERCLA) for OU-9 at Naval Surface Warfare Center–White Oak, low level cVOCs were found in Paint Branch Creek. However, these cVOCs, primarily TCE, were found in a very limited segment of the Creek at acceptable levels in regard to human health exposures. However, once active treatment of groundwater began, contaminant levels in surface water declined and it is no longer monitored. The clean-up target for surface water was determined based on human health risk scenarios. The risk level was set at 200 parts per billion (ppb) for TCE. Contaminant discharge into the Creek were below 200 ppb and were considered insignificant prior to groundwater treatment, and now more so since contaminant loading to the Creek has ceased.

Reference: USN Naval Surface Warfare Center–White Oak, Silver Spring, MD Record of Decision (ROD) for OU 9, September 28, 2005.

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

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

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.

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

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):

To meet the requirements of the USN Naval Surface Warfare Center–White Oak, Silver Spring, MD Record of Decision (ROD) for OU 9, the Navy continues to monitor the chlorinated solvent plume on ALC. ALC also monitored the groundwater in the Building 500 area to track TCE and other low-level contaminants.

(1) USN Naval Surface Warfare Center–White Oak, Silver Spring, MD Record of Decision (ROD) for OU 9, September 28, 2005;

(2) 2016 Basewide Long-Term Monitoring Report (Final) for Former Naval Surface Warfare Center-White Oak, Silver Spring, MD, October 2017 by CH2M.

(3) Long Term Monitoring Report #5, Sampling Event at the Building 500 and Site 8 Areas– June 200, by US Army Engineer District, Baltimore.

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).

☒ 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 (insert facility and EPA ID #, located at (insert address). 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 7-17-2018
Barbara Smith
Environmental Scientist

Supervisor _____ Date 7/17/2018
Luis Pizarro
Associate Director
EPA Region III

Locations where References may be found:

US EPA Region III
Land and Chemicals Division
1650 Arch Street (3LC10)
Philadelphia, PA 19103

Contact telephone numbers and e-mail:

Barbara Smith
Phone no.: (215) 814-5786
Smith.Barbara@EPA.gov