UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

January 29, 2001

4WD-RPB

SUBJ: Addendum to September 30, 1997, Environmental Indicator Memorandum for Delphi Packard Electric Systems*
MSD 065 462 517

FROM: Robert Morris, Environmental Engineer
South Programs Section
RCRA Programs Branch

TO: File

On January 29, 2001, EPA updated RCRA Info to indicate YE Status Codes for both CA725 and CA750. This action was taken because the existing Status Codes, NC for CA725 and NR for CA750, are no longer supported in RCRA Info (i.e., the RCRA Info Data Element Dictionary does not offer NC or NR as Status Code options). Since NC and NR represent situations where no contamination exists, and hence no possibility for current human exposures or contaminated groundwater migration to occur, it is appropriate to enter a YE.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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ATLANTA FEDERAL CENTER
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SEP 30 1997

4WD-RPB

SUBJ: Evaluation of Delphi Packard Electric Systems' status under the RCRIS Corrective Action Environmental Indicator Event Codes (CA725 and CA750)
EPA I.D. Number: MSD 065 462 517

FROM: Elizabeth Bartlett, Environmental Engineer
South Programs Section

THRU: Kent Williams, Chief
South Programs Section

TO: Narindar Kumar, Chief
RCRA Programs Branch

I. PURPOSE OF MEMO

This memo is written to formalize an evaluation of Delphi Packard Electric Systems' status in relation to the following RCRIS corrective action codes:

1) Human Exposures Controlled Determination (CA725),

2) Groundwater Releases Controlled Determination (CA750).

The application of these event codes at Delphi Packard Electric System adheres to the event code definitions found in the Data Element Dictionary for the Resource Conservation and Recovery Information System (RCRIS).

Concurrence by the RCRA Programs Branch Chief is required prior to entering these event codes into RCRIS. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by dating and signing above.

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II. HUMAN EXPOSURES CONTROLLED DETERMINATION (CA725)

There are five (5) national status codes under CA725. These status codes are:

1) YE Yes, applicable as of this date.

2) NA Previous determination no longer applicable as of this date.

3) NC No control measures necessary.

4) NO Facility does not meet definition.

5) IN More information needed.

The first three (3) status codes listed above were defined in January 1995 Data Element Dictionary for RCRIS. The last two (2) status codes were defined in June 1997 Data Element Dictionary.

Note that CA725 is designed to measure human exposures over the entire facility (i.e., the code does not track SWMU specific actions or success). Every area at the facility must meet the definition before a YE or NC status code can be entered for CA725. The NO status code should be entered if there are current unacceptable risks to humans due to releases of hazardous wastes or hazardous constituents from any SWMU(s) or AOC(s). The IN status code is designed to cover those cases where insufficient information is available to make an informed decision on whether or not human exposures are controlled. If an evaluation determines that there are <u>both</u> unacceptable and uncontrolled current risks to humans at the facility (NO) along with insufficient information on contamination or exposures at the facility (IN), then the priority for the EI recommendation is the NO status code.

In Region 4's opinion, the previous relevance of NA as a meaningful status code is eliminated by the June 1997 Data Element Dictionary's inclusion of NO and IN to the existing YE and NC status codes. In other words, YE, NC, NO and IN cover all

Delphi Packard Electric Systems received a RCRA permit from the State of Mississippi to operate the two container storage areas on September 26, 1989. The federal HSWA permit was issued by EPA on September 21, 1992, which covers twenty-three (23) SWMUs and one AOC. All of these units were listed as requiring "no further action" except for two SWMUs which required confirmatory sampling to determine whether releases occurred from these units. The confirmatory sampling work plan was initially submitted in October 1992, and the revised work plan was approved by EPA on January 7, 1994. The confirmatory sampling report was submitted to EPA on April 18, 1994.

IV. MEDIA BY MEDIA DISCUSSION OF CONTAMINATION AND THE STATUS OF PLAUSIBLE HUMAN EXPOSURES

Groundwater

The groundwater is reasonably expected not to be contaminated at this time. Because contamination is not reasonably expected to have occurred, there are no plausible human exposures which must be controlled due to contaminated groundwater.

Surface Water

Surface water associated with the facility is reasonably expected not to be contaminated at this time. Because contamination is not reasonably expected to have occurred, there are no plausible human exposures which must be controlled due to contaminated surface water.

Soil

Confirmatory soil sampling was required for an Underground Wire Drawing Compound Tank (SWMU 13) and a Spent Systems Underground Tank (SWMU 14). These tanks are associated with a part of the manufacturing process where a wire drawing compound is used to lubricate and cool the die heads of the drawing machines. This compound consists of a mixture of 95 percent water and 5 percent oil emulsion. Repeated use of the drawing compound resulted in a waste that consisted of copper fines and

oil emulsion. SWMU 13 was taken out of service and filled with sand and gravel in 1985. Visual inspection of this unit by MDEQ personnel during closure did not reveal any cracks or leaks. SWMU 14 is still in operation.

During confirmatory sampling, four soil borings were collected at SWMU 13 and two at SWMU 14. All borings were completed to a depth of 20 feet. A soil sample from each boring with the highest PID measurement was collected and analyzed for 8240 volatile organics and 8270 semi-volatile organics. All but one of the samples came up non-detect for volatiles and semi-volatiles. One sample at the 2 to 4 foot interval near SWMU 13 showed acetone at .270 parts per million which is less than the 8 parts per million Region 3 "Soil Screening Level for Transfer from Soil to Groundwater." Additional sampling near this location did not confirm the presence of acetone.

Based on this information, soil at the facility is not contaminated. Because there is no contamination, **there are no plausible human exposures which must be controlled due to contaminated soil.**

<u>Air</u>

Releases to air from soil, groundwater and/or surface water contaminated by SWMUs and/or AOCs at the facility is not expected to be occurring at concentrations above relevant action levels. **Therefore, there is no human exposure to contamination via an air route.**

V. STATUS CODE RECOMMENDATION FOR CA725:

Based on the preceding media by media evaluation, there is no contamination present at Delphi Packard Electric Systems. Because there is no risk of human exposure to contaminant releases at the facility due to low/nonexistent contaminant levels (i.e., less than action levels), it is recommended that CA725 NC be entered into RCRIS.

VI. GROUNDWATER RELEASES CONTROLLED DETERMINATION (CA750)

There are five (5) status codes listed under CA750:

1) YE Yes, applicable as of this date.

2) NA Previous determination no longer applicable as of this date.

3) NR No releases to groundwater.

4) NO Facility does not meet definition.

5) IN More information needed.

The first three (3) status codes listed above were defined in January 1995 Data Element Dictionary for RCRIS. The last two (2) status codes were defined in June 1997 Data Element Dictionary.

The status codes for CA750 are designed to measure the adequacy of actively (e.g., pump and treat) or passively (e.g., natural attenuation) controlling the physical movement of groundwater contaminated with hazardous constituents above relevant action levels. The designated boundary (e.g., the facility boundary, a line upgradient of receptors, the leading edge of the plume as defined by levels above action levels or cleanup standards, etc.) is the point where the success or failure of controlling the migration of hazardous constituents is measured. Every contaminated area at the facility must be evaluated and found to have the migration of contaminated groundwater controlled before a "YE" status code can be entered.

If contaminated groundwater is not controlled in any area(s) of the facility, the NO status code should be entered. If there is not enough information at certain areas to make an informed decision as to whether groundwater releases are controlled, then the IN status code should be entered. If an evaluation determines that there are <u>both</u> uncontrolled groundwater releases for certain units/areas (NO) and insufficient information at

certain units/areas of groundwater contamination (IN), then the priority for the EI recommendation should be the NO status code.

In Region 4's opinion, the previous relevance of NA as a meaningful status code is eliminated by the June 1997 Data Element Dictionary's inclusion of NO and IN to the existing YE and NR status codes. In other words, YE, NR, NO and IN cover all of the scenarios possible in an evaluation or reevaluation of a facility for CA750. Therefore, it is Region 4's opinion that only YE, NR, NO and IN should be utilized to categorize a facility for CA725. No facility in Region 4 should carry a NA status code.

This evaluation for CA750 is the first formal evaluation performed for Delphi Packard Electric Systems. Please note that CA750 is based on the adequate control of all contaminated groundwater at the facility.

The following discussions, interpretations and conclusions on contaminated groundwater at the facility are based on the following reference documents:

- Confirmatory Sampling Report, April 1994
- Confirmatory Sampling Work plan, March 1993
- RCRA Facility Assessment Report, October 1989

VII. STATUS CODE RECOMMENDATION FOR CA750:

Based on data contained in the documents referenced in Section V, there are no known releases of hazardous constituents to groundwater in excess of relevant action levels at Delphi Packard Electric Systems. Therefore, it is recommended that CA750 NR be entered into RCRIS.

VIII. SUMMARY OF FOLLOW-UP ACTIONS

No follow-up actions are necessary at this time, as there are no plausible human exposures which must be controlled due to any contaminated media at the site.