

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: GE Skeats High Power Laboratory  
Facility Address: 7500 Lindbergh Boulevard, Philadelphia, PA 19153  
Facility EPA ID #: PAD 07 552 7804

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 "Current Human Exposures Under Controls" EI**

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "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).

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

Page 2

2. Is groundwater known or reasonably suspected to be "contaminated"<sup>1</sup> above appropriately protective risk-based "levels" (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 (for any media) – skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The former GE Skeats High Power Laboratory property is now part of the Philadelphia Processing and Distribution Center of the USPS in Philadelphia, PA. Buildings that occupied GE Skeats have been demolished. Past operations conducted at GE Skeats included load testing of electric transformers containing dielectric fluids with PCBs.

Several environmental investigations were completed at GE Skeats between 1999 and 2004. These investigations encompassed soil and groundwater.

Groundwater

Across the site, there are 20 monitoring wells which were used to assess groundwater quality between 1990 and 1999. The 1999 Request for Non-Use Aquifer Determination (NUAD), and the 1999 Phase II Environmental Site Assessment Report identified several contaminants found in the groundwater above EPA's screening values used to initially evaluate data: the Maximum Contaminant Level (MCL) for drinking water or the EPA Regional Screening Level Table standard for tap water.

The contaminants found in groundwater were: tetrachloroethylene (PCE) (MCL=5ug/l), trichloroethylene (TCE) (MCL=5ug/l), benzene (MCL=5ug/l), naphthalene (tap water=0.14ug/l), vinyl chloride (MCL=2ug/l), bis(2-ethylhexyl)phthalate (MCL=6ug/l), chromium (MCL=100ug/l), and manganese (tap water=320ug/l). Primarily, these contaminants were found at levels only slightly exceeding their screening values. Only benzene, PCE, TCE and naphthalene were found at more increased concentrations and only very localized. There is no widespread distribution of any contaminants. No detection of these contaminants has been found at the downgradient or perimeter wells, which indicates contamination does not go off-site.

Stormwater and Septic Systems - PCE (5ug/l), 6 ug/l, - TCE (5ug/l), 5 ug/l, to 98 ug/l - Bis(2-ethylhexyl)phthalate (6ug/l), 7 ug/l - Manganese (320ug/l), 3030 ug/l	Hazardous Waste Storage Area - TCE (5ug/l), 5 ug/l - Chromium (100ug/l), 410 ug/l - Manganese (320ug/l), 412 ug/l
--	--

<sup>1</sup>"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).

Two, 5,000 Gallon USTs North of Building 20 - Benzene (5ug/l), 66 pg/L and 45 ug/l - Naphthalene (0.14ug/l), 73 ug/l	Gale Oil/Water Separator - Vinyl chloride (2ug/l), 3.0 ug.l - Bis(2-ethylhexyl)phthalate (6ug/l), 6.4 ug/l
Building 22 A Subsurface Spill - PCE (5ug/l), 14 ug/l	Transil Oil Distribution System - TCE (5ug/l), 8 ug/l
High and Cap Yard - TCE (5ug/l), 6.9 ug/l - PCE (5ug/l), 6.7 ug/l	

Exposure pathways

The site currently is 95% covered by buildings and paved parking lots, with landscaping at the perimeter. There is no current or expected exposure to workers at the facility to groundwater. The groundwater at this site is not used for any potable, industrial or agricultural purposes.

**References:**

*EPA Region III Office has excerpts of reports. Full reports may be found at PADEP Southeast Regional Office.*

1. Preliminary Assessment (PA) Report, 1984, NUS Corporation
2. Draft Phase II Environmental Site Assessment for the Proposed Relocation of the Processing and Distribution Center, 1999, Weston (*partial report*)
3. Closure of Former Hazardous Waste Accumulation Area (Less than 90-day Storage), 1999, O'Brien & Gere Engineers Inc. (*partial report*)
4. Decontamination and Demolition Project, Project Closure Report, 1999, MARCOR Remediation Inc. (*partial report*)
5. Request for Non-Use Aquifer Determination, 1999, Weston
6. Remedial Action Report, 2004, Pennoni (*partial report*)
7. 7500 Lindbergh Boulevard Property, Vapor Intrusion Weight of Evidence Evaluation, EPA, date July 23, 2012

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

Page 4

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"<sup>2</sup> 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"<sup>2</sup> )

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup> ) - 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):

Twenty monitoring wells were used to assess groundwater quality between 1990 and 1999. Primarily, the contaminants were found at levels only slightly exceeding their screening values. Only benzene, PCE, TCE and naphthalene were found at more increased concentrations and only very localized. There is no widespread distribution of any contaminants. No detection of these contaminants has been found at the downgradient or perimeter wells, which indicates contamination does not go off-site. Additional monitoring of groundwater is not required as contaminants have remained on-site and the localized plume contracted over the time-span it was monitored. The site is covered with building footprints and paving, reducing rainwater infiltration and reducing mobility of the contaminants.

<sup>2</sup> "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)**  
Page 5

4. 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 and Reference(s):

---

There are no surface water bodies on the site. In addition, no detection of these contaminants has been found at the downgradient or perimeter wells, which indicates contamination does not go off-site.

**Migration of Contaminated Groundwater Under Control**  
**Environmental Indicator (EI) RCRIS Code (CA750)**  
Page 6

5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration<sup>3</sup> 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<sup>3</sup> 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 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<sup>3</sup> greater than 100 times their appropriate "level(s)," and if 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):

---

<sup>3</sup> 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)**

Page 7

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<sup>4</sup>)?

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<sup>5</sup> 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 a "NO" status, 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):

---

<sup>4</sup> 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.

<sup>5</sup> 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)**  
Page 8

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):

---

Migration of Contaminated Groundwater Under Control

Environmental Indicator (EI) RCRIS code (CA750)

Page 9

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 **GE Skeats High Power Laboratory, EPA ID # PAD 07 552 7804**, located at **7500 Lindbergh Boulevard, Philadelphia, PA 19153** 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) Linda Matyskiela

Date 3/28/2013

(print) Linda Matyskiela

(title) Project Manager

Supervisor:

(signature) Paul Gotthold

Date 3/28/13

(print) Paul Gotthold, Associate Director

(title) Office of PA Remediation

(EPA Region or State) EPA Region III

Locations where References may be found:

PADEP Southeast Regional Office

US EPA Region III

Land Recycling Program

Land and Chemicals Division

2 East Main Street

1650 Arch Street

Norristown, PA 19401

Philadelphia, PA 19103

Contact telephone and e-mail numbers:

(name) Linda Matyskiela

(phone #) 215-814-3420

(e-mail) matyskiela.linda@epa.gov