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: American Ink and Coatings Corporation Facility Address: 330 Pawlings Road, Valley Forge, PA 19482 Facility EPA ID #: PAD002353290

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?

\bowtie	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).

- 1. Is groundwater known or reasonably suspected to be "contaminated" 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."
 - \boxtimes If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

American Lacquers and Solvents began operations on the property in the 1920's, producing solvent and water-based inks and paint products. The property is situated on the bank of the Schuylkill River. The property historically consisted of fourteen buildings, laboratory, hazardous waste storage areas, raw ink storage areas, tank farms, warehouses, and offices. In 1976, the Facility changed names to AIC and sold the paint portion of the company but continued to manufacture printing inks on site until 2006. In 2006, the property was sold to Delaware Valley Properties II, LLC and is currently used by Delaware Valley Paving for an office, equipment storage, and parking.

There have been no formal subsurface soil investigations conducted at the Site. Soil investigations were initiated in response to specific releases or upon removal of several of the closed-in-place USTs. There have been no groundwater or surface water investigations on site.

Many underground storage tanks (USTs) and aboveground storage tank (AST) have existed on the property for storage of hazardous materials and wastes. A total of 22 USTs and 23 ASTs are known to have existed on the property. Some of these USTs were described as former steel-constructed railroad cars and reportedly stored hazardous materials used during the ink/paint manufacturing process. While all of the ASTs and some of the USTs have been removed from the property, some USTs remain closed in place. Many of the USTs were reportedly leak tested before being closed in place, however documentation of that testing is not available in most cases. Multiple inspections by PADEP in the 1980s and 1990s found evidence of material spillage throughout the property onto surface soils and into trench drains that discharge into the Schuylkill River. The operating and manufacturing processes on the property could have resulted in contamination of soils and potentially groundwater, however groundwater quality at the facility has never been characterized.

Two production wells were located on-site. These wells (depths of 150 and 177 feet bgs) were reportedly abandoned in 1980 when public water began to be supplied to the Facility and neighboring properties. It is unknown whether these wells remain on-site and open. If either one or both of these wells remained open during the Facility's operational period, the wells could have been a conduit for contaminants from the surface to the underlying groundwater.

The groundwater flow gradient for the Site has not been established; however, it is presumed the groundwater flow is toward the east in the direction of the Schuylkill River. There is currently no information relative to groundwater quality from possible known on-site sources, thus it is not possible at this time to determine if groundwater has been impacted or may be discharging to the river. Therefore, it is currently unknown whether a complete exposure pathway from surface water to off-site human and ecological receptors is present.

Footnotes:

[&]quot;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).

- 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):

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.

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 and Reference(s):

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration³ 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 concentration₃ 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 concentration₃ 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 concentrations³ 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):

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

- 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-assessment₅, 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 ecosystems.

- 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):

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

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Kristin Koroncai Remedial Project Manager Date: <u>9/25/2023</u>

Supervisor

Alizabeth Olhasso Section Chief, RCRA Corrective Action South EPA Region III Date

Locations where References may be found:

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