

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: Former Airco Welding Products
Facility Address: Route 616, P.O. Box 450, Rural Retreat, VA 24368
Facility EPA ID #: VAD 066 020 439

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

The former Airco facility was located at Route 616 in Rural Retreat, VA 24368. This five acre site consists of a warehouse; asphalt parking; gravel driveways and parking; a concrete-paved truck loading area; and undeveloped grassy areas. A small stream and wetland areas transects the property to the south of the site building. Airco operated at the site from 1976 through 1982/1983 as a manufacturer of gas welding products. Airco's manufacturing process involved forging, machining, and drilling of copper material. Airco reportedly continued to lease the site for several years following vacating the facility. In 1985, Standard Motor Parts, subsequently EIS Brake Parts, leased the space and for refurbishing brake assemblies. Camrett Logistics leased the site between 1996 and 2006. During this timeframe, the building and land were sold. PAW Industrial Properties, LLC is the current owner of the property and leases part of the building as a distribution warehouse and office space.

Airco was identified as a large quantity generator (LQG) of hazardous waste under RCRA Regulations and operated as a hazardous waste management facility under interim status from November 19, 1980, until the plant closed operations in 1982/1983. Airco operated two SWMUs under interim status. The hazardous waste drum storage unit on an asphalt area just southwest of the building. Airco also operated a treatment tank that qualified as a totally enclosed elementary neutralization system, which was later removed from the RCRA Part A Application.

Two fuel oil Underground Storage Tanks (USTs) are currently located at the site; one 2,000-gallon and one 3,000-gallon. The oil stored in these tanks was used for process equipment used by EIS brake parts, a Division of Standard Motor Parts, (who occupied the site from 1985 until 1996) and potentially by Airco as tank records indicate installation dates back to 1976. During a 2008 site visit, Camrett representatives indicated that they do not currently utilize the USTs and that the tanks containing heating oil. The tanks were scheduled for removal in February 2009.

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).

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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?

- 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 former Airco Welding Products maintained a number of SWMUs. Each of these units was closed in 1984 in accordance with the facility’s approved Closure Plan. Although groundwater monitoring wells have not been installed, contamination above appropriately protective levels is not suspected for this site. The work areas at the facility are within the building and the parking area is covered with asphalt, which serves to limit the potential for impacts to underlying groundwater. The nature of the facility’s historical manufacturing and waste management operations and current facility warehousing operations are not believed to have impacted the soils or groundwater at the site.

No information relating to investigation or remediation of soils or groundwater associated with any of the site’s SWMUs was provided. In addition, no evidence of a spill or release was found during the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

Two USTs are currently located at the site; one 2,000-gallon and one 3,000-gallon. The USTs were reportedly used to store fuel oil for process equipment during EIS’ and potentially Airco’s occupancy. Information provided during the site visit indicates the tanks contain heating oil. According to the CA Final Site Visit Report, dated February 18, 2009, the two USTs were installed in 1976 and 1995, respectively, and were not registered with the Commonwealth of Virginia State Water Control Board (SWCB) or the VDEQ. According to site representatives, these tanks were removed in February 2009 as new gas heaters have been installed.

The USTs at the facility that store petroleum products falls under the regulatory oversight of the VDEQ’s Tank Program which regulates petroleum USTs under Article 9 and 10 of the Virginia State Water Control Law (SWCL). Virginia Regulations which regulate USTs fall under 9 VAC 25-580, Underground Storage Tanks: Technical Standards and Corrective Action Requirements. The above SWCL and applicable State Regulations enables the VDEQ to administer the petroleum UST federal law under RCRA Subtitle I. Therefore, any closure and/or corrective action associated with any release of petroleum products from the subject USTs will fall under the regulatory oversight of the VDEQ’s Tank Program, which administers the requirements of RCRA Subtitle I in Virginia.

Furthermore, it should be noted that RCRA CA under Section 3008(h) is not applicable to petroleum USTs regulated under RCRA Subtitle I.

The VDEQ’s Southwest Regional Office (SWRO) has been notified by e-mail correspondence, dated March 14, 2008, which documents the existence of the petroleum USTs at the facility and the pending closure of the tanks as noted in the below Final Site Visit Report (see below). The proper closure and any needed CA at the facility site regarding the USTs will fall under the regulatory oversight of the VDEQ’s Tank Program in accordance with the applicable State Law and Regulations Federal Law, as noted above.

It should be noted that the town of Rural Retreat provides potable water supply and sanitary sewer service to the property and nearby properties.

In addition, it should be noted that no drinking water wells or groundwater monitoring wells exist at the site; therefore, groundwater quality is not known. However, the existence of potable water supply to the facility and surrounding area reduces the potential risk exposure to human health.

Any future closure and/or corrective action associated with any release of petroleum products from the subject USTs will fall under the regulatory oversight of the VDEQ's Tank Program, which requires closure and/or corrective action to address potential risk to human health and the environment.

For additional information see the February 18, 2009 Final Site Visit Report for the Former Airco Welding Products Facility.

Footnotes:

i“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).

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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)?
- 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.

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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):

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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.

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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 eco-systems.

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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):

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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 Former Airco Welding Products, EPA ID # VAD 066 020 439, Route 616, P.O. Box 450, Rural Retreat, VA 24368. 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) _____ SIGNED _____ Date 3/17/09 _____
Denis M. Zielinski _____
Senior RPM _____

Supervisor (signature) _____ SIGNED _____ Date 3/17/09 _____
Luis Pizarro _____
Associate Director, Office of Remediation _____
EPA Region III _____

Locations where References may be found:

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