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: **Elco Corporation**
Facility Address: **10426 Fairgrounds Road, Huntingdon, PA 16652**
Facility EPA ID #: **PAD 003009461**

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])

   [X] If yes – check here and continue with #2 below.

   [ ] If no – re-evaluate existing data, or

   [ ] If data are not available skip to #6 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).

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?

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 - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

General Information:

Constructed in 1961, the former Elco Corporation Facility used stamping and surface finishing processes, such as electroplating, anodizing, zincating and chromating, to manufacture metal electrical components until it closed on June 30, 1996. Electroplating processes at the Facility included copper, nickel, gold, tin-lead, zinc and silver. The Facility was purchased by AVX, a manufacturer of and supplier of electronic components in 1996 In 2000, AVX sold the Facility to D. Real Estate, Inc. The Facility is currently occupied by Seven D. Industries, LP, who manufactures vinyl window and patio door products.

Groundwater:

The water bearing formation beneath the former Elco Corporation property (Facility) is comprised of weathered bedrock underlain by competent shale bedrock. Groundwater occurs at shallow depths and ranges from about 1.5 ft. below ground surface (bgs) behind the Facility building to 9 ft. bgs at the southeastern propety boundary. Groundwater flow is to the southeast toward Crooked Creek, which represents the groundwater discharge boundary for the bedrock groundwater system. The hydraulic conductivity (ability to transmit water) of the bedrock formation is very low and indicative of a low permeability groundwater system.

In 1996, elevated levels of volatile organic compounds (VOCs) were detected in the groundwater beneath the facility building. The major constituents of concern are trichloroethylene (TCE) and its breakdown products cis-1,2-dicloroethylene (1,2-DCE) and vinyl chloride, in addition to 1,1,1-trichloroethane (1,1,1-TCA), 1,1-dichloroethane (1,1-DCA), toluene, and methylene chloride. The highest VOC concentrations (above 100,000 µg/l) were detected in the northeast area of the western part of the former plating department (MW-8) and in the former orange team room (WM-10). Elevated VOC concentrations were also detected in the former drum storage area (5,000 µg/l in MW-11) and in the adjacent building alleyway (12,000 µg/l in MW-12). These areas are all areas where solvents were handled during previous operations and are source areas where VOC constituents are believed to have entered the groundwater. Additionally, investigative findings indicate that the TCE contamination predates the 1966 building addition and appears to date back to about 42 years, to releases during the early years of operation from 1962 through 1966. The area of groundwater contaminated with VOCs was estimated to be approximately 4.2 acres.

Environmental remediation was implemented at the Facility in 1997 by AVX Corporation (AVX) on a voluntary basis in accordance with Pennsylvania's Land Recycling and Environmental Remediation Standards Act (Act 2). Remediation of the site included the removal of soil and concrete contaminated with VOCs and the installation of a vacuum enhanced recovery (VER) system to remove VOCs, primarily TCE, from contaminated soil and groundwater. The VER system was in operation from April 1998 to December 2000 and removed 780 pounds (62-gallons) of TCE. AVX continues to monitor the groundwater quality at the site under a Post Remediation Care Plan Based on a review of the groundwater monitoring data provided by AVX, elevated concentrations of VOCs remain present in the groundwater at the site.

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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).

References:

Remedial Investigation Report, Former Elco U.S.A. Facility, Huntingdon, Pennsylvania, prepared by Vincent Uhl Associates, Inc., September 2000; Final Report, Former Elco U.S.A. Facility, Huntingdon, Pennsylvania, prepared by Vincent Uhl Associates, Inc., March 2003; Results of Post-Remediation Care Groundwater Monitoring Events November 2008 and April 2009, Former Elco U.S.A. Facility, Huntington, Pennsylvania, prepared by Uhl, Baron, Rana, & Associates, Inc., June 2009.

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.

X If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

EPA is currently reviewing the September 2002 Remedial Investigation Report, prepared by Vincent Uhl Associates, Inc., to determine whether or not the extent (vertical and horizontal) of VOC contamination in the groundwater at the Former Elco Corporation Facility was characterized.

2 "existing area of contaminated groundwater" is an area (with horizontal andvertical 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.

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.

_X_ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

EPA is currently reviewing the September 2002 Remedial Investigation Report, prepared by Vincent Uhl Associates, Inc., to determine whether or not the extent (vertical and horizontal) of VOC contamination in the groundwater at the Former Elco Corporation Facility was characterized.

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 judgement/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):

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 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.

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.

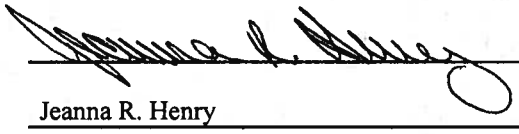
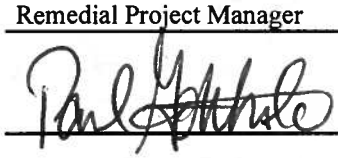
Rationale and Reference(s):

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 Elco Corporation Facility, EPA ID No. PAD003009461, located at 10426 Fairgrounds Road, Huntingdon, Pennsylvania. 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.

__X__ IN - More information is needed to make a determination.

Completed by	(signature)		Date 6/3/10
	(print)	Jeanna R. Henry	
	(title)	Remedial Project Manager	
Supervisor	(signature)		Date 8-19-10
	(print)	Paul Gotthold	
	(title)	Associate Director	
	(EPA Region or State)	EPA Region III Office of Pennsylvania Operations	

Locations where References may be found:

USEPA Region III
Land and Chemicals Division
1650 Arch Street
Philadelphia, PA 19103

PADEP
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110

Contact telephone and e-mail numbers

(name)	Jeanna R. Henry
(phone#)	(215) 814-2820
(e-mail)	henry.jeannar@epa.gov