

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: **Mack Trucks, Inc.**
Facility Address: **7000 Alburdis Road, Macungie, PA 18062**
Facility EPA ID #: **PAD 060493582**

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])

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).

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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.

- X 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):

Groundwater samples were collected on December 30, 1994 and January 5, 1995. The groundwater sample for one well (MW3) tested positive for TPH DRO and GRO, benzene, toluene, ethyl benzene, and total xylenes. Groundwater samples from four wells tested positive for either TPH DRO or GRO. However, it was determined that the positive detection of TPH DRO was due to a small fraction of weathered gasoline components which fell within the range of the TPH DRO analysis. After excavation and removal of soil from the former gasoline tank area, confirmatory groundwater samples were taken again on May 25, 1995. TPH DRO, GRO, and BTEX values decreased significantly in two wells (MW3 and MW4) due to the excavation of the former gasoline tank field soils. TPH DRO, GRO, and BTEX values increased slightly in three wells (MW1, MW2, and MW5). This increase may have been caused by collecting samples too soon after monitoring well construction and before the groundwater returned to a steady state.

Public water supply wells were sampled on December 30, 1994, May 25, 1995 and October 20, 1995. The results were indicative of non-detectable values in raw water for each of the three sampling events.

In summary, the sampling results indicate that dissolved-phase hydrocarbon components had dispersed both down- and lateral-gradient relative to the former gasoline tank field area. The study results document that the dispersion of hydrocarbon material emanating from the former tank field area is not wide spread, and is vertically and horizontally limited. Subsequently, a hydrocarbon impact to Mack Trucks supply wells has not, and is not expected to occur from existing subsurface conditions.

A fate and transport model was developed to project average groundwater and soil concentrations, and the total mass of hydrocarbons remaining at the property. The model predicts that the study area is well within the boundary limits of the Mack Trucks, Inc. property. Based on the evaluation of the soil and groundwater data, as well as shallow groundwater flow, and aquifer parameters, it was concluded that the results technically demonstrate existing subsurface conditions within the study area, have not at this time, and are not expect in the future, to exceed property boundaries, nor impact property receptors.

An attenuation model was developed on site specific groundwater flow velocities, oxygen uptake rates and other technically defensible data to predict the fate of dissolved hydrocarbons emanating from the source area. The only hydrocarbon concentration which is projected to be above the federal drinking water standards is benzene. The model projects that this benzene concentration decreases to less than the federal drinking water standard (5 part per billion [ppb]) within 442 feet of the source area. However, due to truncation, this standard is met within about 150 feet from the former tank field area. All federal drinking water standards are therefore currently met within approximately 150 feet of the former source area. After eighteen years both benzene and TPH are projected to be non-detectable at a distance of 150 feet from the source area.

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).

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A Remedial Action Completion Report, Risk Assessment and Fate and Transport Evaluation Groundwater Monitoring Results and Demonstration of Attainment Documentation was submitted to Mack Trucks, Inc. by AJA on March 6, 2000. The report was provided as documentation of compliance and attainment of the remediation closure standards as specified in the Pennsylvania Department of Environmental Protection's (PADEP) Chapter 245 and ACT 2 for the regulated unleaded gasoline constituents related to the five former underground storage tanks located on the Mack Trucks, Inc. facility. The report was submitted to obtain approval from the PADEP indicating that the reporting requirements specified in Chapter 245 had been completed and that the data and evaluations for the subject property indicate compliance and attainment of the specified remediation standards.

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):

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 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 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-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 specialist, 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).

 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 **Mack Trucks, Inc.** facility, EPA ID # **PAD 060493582** , located at **7000 Alburdis Road, Macungie, PA 18062** . 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 - Unaccepted migration of contaminated groundwater is observed or expected.

 IN - More information is needed to make a determination.

Completed by	(signature)	_____	Date	_____
	(print)	_____		_____
	(title)	_____		_____
Supervisor	(signature)	_____	Date	_____
	(print)	_____		_____
	(title)	_____		_____
	(EPA Region or State)	<u> Paul Gotthold </u>		<u> 6-25-09 </u>

Locations where References may be found:

USEPA Region III Waste and Chemical Mgmt. Division 1650 Arch Street Philadelphia, PA 19103	PADEP Northeast Regional Office 2 Public Square Wilkes-Barre, PA 18711
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Contact telephone and e-mail numbers

(name)	_____
(phone#)	_____
(e-mail)	_____