



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: Wyman - Gordon Worcester
Facility Address: 105 Madison St. Worcester, MA
Facility EPA ID #: MAD001128016

- 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 "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

RCRA RECORDS CENTER
FACILITY Wyman - Gordon
I.D. NO. MAD001128016
FILE LOC. R-13
OTHER # 107896

Contact telephone and e-mail numbers

(name) \_\_\_\_\_  
(phone #) \_\_\_\_\_  
(e-mail) \_\_\_\_\_

**FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.**

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"<sup>1</sup> 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):

Several studies have been conducted at the Wyman-Gordon Facility which together comprise a Response Action Outcome (RAO) for the entire site. The RAO provides documentation that a "Permanent Solution" as defined in the Massachusetts Contingency Plan (MCP) regulations 310 CMR 40.0000 has been achieved at the site. The RAO relies on the placement of an Activity and Use Limitation (AUL) on the property which restricts it to non-residential uses. The LSP for the facility owner/operator has determined that no additional response actions are necessary at the facility.

Wyman-Gordon Worcester Facility consists of approximately 26 acres of land which is zoned for general manufacturing and industrial uses. It is surrounded by a mixture of other industrial, commercial and residential properties. Wyman-Gordon performed ferrous and non-ferrous metal forging operations at the site. In 2003 Wyman-Gordon purchased the abutting Stanly Tools site at 149 Washington Street.

Contaminant of Concern include Volatile Organic Compounds (i.e. chlorinated solvents), PCB's, and Petroleum Hydrocarbons. Releases to the soil, ground water and air have occurred historically at the site and remediation activities have been conducted to address the releases. The potential human exposure pathways at the site are through contact with soils by workers and trespassers and the inhalation of indoor air by nearby residential structures. Studies have shown that the concentration of residual ground water contamination does not pose a risk to Human Health at the site for workers, trespassers or nearby residents. Wyman-Gordon utilized both a Method 1 and Method 3 Risk Characterization as defined in the MCP to support this conclusion.

Risk Evaluation Basis: Ground Water

No water supply wells have been identified within 500 feet of the Site, and the Site is not located within 400 feet of a Class A Surface Water Body; therefore,

contact with constituents in groundwater through drinking water supplies is not a potential exposure pathway at this Site. Because the depth to groundwater across the Site is less than 15 feet bgs, groundwater located within 30 feet of existing on-Site buildings is classified as GW-2, which indicates the potential for volatile constituents in groundwater to migrate into the indoor air of buildings but does not indicate that such migration has occurred. According to the MCP (310 CMR 40.0932(2)), groundwater at all sites is considered to be a potential source of discharge to surface water and therefore is classified as GW-3 under Massachusetts regulations 310 CMR 40.0000.

#### Conclusion

Ground water migration is controlled at the site and it does not exceed applicable GW-3 standards. The conclusions of the risk characterization indicate that a condition of No Significant Risk of harm to health, safety public welfare, and the environment has been demonstrated for residual levels of petroleum, polychlorinated biphenyls (PCBs), metals, semi-volatile organic compounds (SVOCs), and chlorinated volatile organic compounds (CVOCs) in the groundwater.

#### References:

REVISED CLASS A-3 PARTIAL RESPONSE  
ACTION OUTCOME (RAO)  
AND RISK CHARACTERIZATION  
WYMAN-GORDON COMPANY  
105 MADISON STREET AND  
149 WASHINGTON STREET  
WORCESTER, MASSACHUSETTS  
RTN 2-10256

GZA GeoEnvironmental, Inc.  
Norwood, Massachusetts  
August 2009  
File No. 13651.48

PARTIAL RESPONSE ACTION OUTCOME  
(RAO) STATEMENT AND RISK  
CHARACTERIZATION  
WYMAN-GORDON COMPANY  
HERMON STREET PARKING AREA  
105 MADISON STREET  
WORCESTER, MASSACHUSETTS  
RTN 2-10256

GZA GeoEnvironmental, Inc.  
Norwood, Massachusetts  
January 2009  
File No. 13651.48

Footnotes:

"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"<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): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Footnotes:

<sup>1</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.

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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 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 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<sup>3</sup> 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 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): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Footnotes:

<sup>3</sup> 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 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 "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): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Footnotes:

<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.

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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 Wyman - Gordon Worcester facility, EPA ID # MAD001128016, located at 105 Madison St. Worcester, MA. 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) Jeffrey H. Chormann Date 9/28/09  
(print) Jeffrey H. Chormann  
(title) ENVIRONMENTAL ANALYST IV

Supervisor (signature) Maria E. Ripaud Date 9/28/09  
(print) MARIA E. RIPAUD  
(title) Deputy Division Director  
(EPA Region or State) \_\_\_\_\_

Locations where References may be found:

MassDEP  
1 Winter St.  
Bureau of Waste Prevention  
Boston, MA 02108

Reviewed by [Signature]  
Chief, RCRA Corrective Action  
9/30/09

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