

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)**

Migration of Contaminated Groundwater Under Control

Facility Name: Austin Powder Company
Facility Address: 7-LC-10 Blandy Road, East Camden, AR 71701-1600
Facility EPA ID #: ARD093417525

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 #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 nonhuman (ecological) receptors is intended to be developed in the future.

Definition of A 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?

- 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 principal Contaminants of Concern (COCs) in groundwater are Cyclotrimethylenetrinitramine (RDX), 2,4,6-Trinitrotoluene (2,4,6-TNT), HMX, 4-amino-2,6-dinitrotoluene, 2-amino-4,6-dinitrotoluene. No other COCs require further evaluation with regard to human health impacts.

The above listed COCs were detected above the USEPA Region 6 Tap Water Screening Levels and/or USEPA Region 9 Screening Levels as shown in the RCRA Facility Investigation Report – Revision 1 (February 2009) and the Second Half 2009 Groundwater Monitoring Report (March 10, 2010).

Documentation Referenced:

RCRA Facility Investigation Report – Revision 1 (February 2009).
Second Half 2009 Groundwater Monitoring Report (March 10, 2010)

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).

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)?

- X 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):

Austin Powder Company (APC) in accordance with Modules X and XII(b) of Permit 31-H, since September 2005, has conducted and is still conducting groundwater monitoring in nine SWMU-1 wells: one up-gradient well MW-1; the other eight are down-gradient wells MW-3S, MW-3D, MW-4S, MW-4D, MW-5S, MW-5D, MW-6S, and MW-6D/6SS. ADEQ has researched five years worth of COCs in the APC SWMU-1 groundwater monitoring wells database. As documented in the APC database, all of the downgradient groundwater monitoring wells listed have shown downward contamination concentration trends.

APC continues to explore the extent of the downgradient edge of the contaminated groundwater plume which is shown to not be fully delineated. In an attempt to accomplish this, in February 2008, two groundwater monitoring wells (MW-7 and MW-8) were installed. In November 2008, ten temporary groundwater monitoring wells (GP5, GP6, GP7, GP8, GP9, GP10, GP11, GP12, GP13 and GP 14) were installed. In February 2010, APC installed three groundwater monitoring wells (MW-9, MW-10, and MW-11). As of August 2010, APC is still working to delineate the contaminated groundwater plume. APC is optimistic about having the edges of the COC groundwater plume fully delineated this year.

Documentation Referenced:

Permit 31-H, Modules X and XII(b)
RCRA Facility Investigation Report – Revision 1 (February 2009)
Second Half 2009 Groundwater Monitoring Report (March 10, 2010)

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.

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):

Perennial surface water bodies are not present at SWMU 1 and therefore there are no direct pathways from SWMU 1 to the surface water bodies. There are two areas at SWMU 1, these are the Open Burn (OB) area and the Open Detonation (OD) area. During and after periods of heavy rain there may be pools of standing water in both areas at SWMU 1.

To mitigate potential releases of contaminated groundwater into surface water at the OB area, APC has implemented dewatering practices after heavy rain events. If water collects in the secondary containment surrounding the OB area or in the burn units themselves, APC removes the collected water and disposes of it before it has a chance to overflow. Recently, moveable covers installed on track systems were added above the burn pans to prevent the accumulation of water in the pans and concrete pads.

To mitigate potential releases of contaminated groundwater into surface water at the OD area, APC is considering constructing an earthen berm approximately three-foot high around the OD facility so that they will be able to control the stormwater runoff.

Documentation Referenced:

RCRA Facility Investigation Report – Revision 1 (February 2009),

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.

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 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?"
- X 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):

APC in accordance with Modules X and XII(b) of Permit 31-H, will collect groundwater monitoring/measurement data on a semi-annual basis. Newly installed groundwater monitoring wells will have data collected on a quarterly basis for one year and then on a semi-annually basis thence forward. Surface water/sediment/ecological data will be collected as necessary.

Reference:

Permit 31-H, Modules X and XII(b)

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 **Austin Powder Company** facility, EPA ID # **ARD093417525**, located at **7-LC-10 Blandy Road, East Camden, AR 71701-1600**. 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) Catherine Clegg-Riley Date 8-19-2010
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(title) Geologist

Supervisor (signature) Jim Rigg Date 8-19-2010
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AM 8/19/10
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