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**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**
Interim Final 2/5/99
**RCRA Corrective Action**
**Environmental Indicator (EI) RCRAInfo Code (CA725)**

**Current Human Exposures Under Control**

**Facility Name:** Former Evans Harvey Site
**Facility Address:** 1255 Peters Road, Harvey, LA
**Facility EPA ID #:** LAD008158289

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, 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 #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 "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "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 "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

### 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. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

| | Yes | No | ? | Rationale / Key Contaminants |
|---|---|---|---|---|
| Groundwater | X | | | Contaminants above RECAP MO-1 GW3ndw |
| Air (indoors)[2] | | X | | No structures present on site |
| Surface Soil (e.g., <2 ft | X | | | Contaminants above RECAP MO-1 Soil |
| Surface Water | | X | | Groundwater does not discharge to canal |
| Sediment | | X | | No sediment impacted |
| Subsurf. Soil (e.g., >2 ft) | X | | | Contaminants above RECAP MO-1 Soil |
| Air (outdoors) | | X | | Contaminants are not detected above GWair standard |

____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

__X__ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):
Analytical results from borehole water samples collected from the Areas of Investigation (AOI-1 and AOI-3) indicated that fourteen constituents were detected with concentrations that exceeded the limiting RECAP Management Option 1 (MO-1) Standards: anthracene, Aroclor 1260, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, bis(2-ethylhexyl)phthalate, chrysene, fluoranthene, lead, pentachlorophenol, pyrene,4,4'-DDE and 4,4'-DDT

Analytical results from November 2010 and June 2012 investigations for Areas of Investigation (AOI-1, AOI-2, AOI-3, AOI-5, AOI-6, and AOI-7) indicated that eleven constituents were detected in select soil samples with concentrations that exceeded the limiting soil RECAP Management Option 1 (MO-1) Standards: antimony, Aroclor 1260, arsenic, barium, benzo(a)pyrene, cadmium, chromium, lead, mercury, selenium, and zinc.

Footnotes:

[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 appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

| | Potential **Human Receptors** (Under Current Conditions) | | | | | | |
|---|---|---|---|---|---|---|---|
| **"Contaminated" Media** | Residents | Workers | Day-Care | Construction | Trespassers | Recreation | Food[3] |
| Groundwater | no | no | no | no | | | no |
| ~~Air (indoors)~~ | ___ | ___ | ___ | | | | |
| Soil (surface, e.g., <2 ft) | no | no | no | yes | no | no | no |
| ~~Surface Water~~ | ___ | ___ | | | ___ | ___ | ___ |
| ~~Sediment~~ | ___ | ___ | | | ___ | ___ | ___ |
| Soil (subsurface e.g., >2 ft) | | | | yes | | | no o |
| ~~Air (outdoors)~~ | ___ | ___ | ___ | ___ | ___ | | |

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

_____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

__X__ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and Reference(s):
Engineering and Administrative controls are in place and are proposed to remain in place to prevent exposure pathways from potential completion. The Site is abandoned with no industrial workers on site or planned construction. Soils are beneath concrete and/or aggregate and not exposed to workers or trespassers. Soil containing contaminant levels identified are not in a residential area or commercial area zoned for day care activities. Groundwater is subsurface and within a zone that is not a current or potential source for any public or domestic use, and not beneath any structures. In the event that changes are made to the Engineering or Administrative controls, LDEQ will be notified and the site will be re-evaluated for this indicator.

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

__X__ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):
Engineering and Administrative controls are in place and are proposed to remain in place to prevent exposure pathways from completion. Soils are beneath concrete and/or aggregate and not exposed to workers or trespassers. Soil containing contaminant levels identified are not within a residential area or commercially zoned area. Groundwater is subsurface and within a zone that is not used and not a viable source for any public or domestic use. No structures are present on site that pose an enclosed space scenario for soil/groundwater vapor intrusion. In the event that changes are made to the engineering or administrative controls, LDEQ will reevaluate the site for this indicator.

The only potentially complete pathway is a future construction worker scenario. For the construction worker scenario the exposure pathways for the constituents of concern are all related to dermal contact or accidental ingestion during subsurface excavation all of which are controlled with typical safe work practices for construction at an industrial site.

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):_____

6. Check the appropriate RCRAInfo status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

X YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Former Evans Harvey Site, EPA ID # LAD008158289, located at 1255 Peters Road, Harvey, LA under current and reasonably expected conditions. **This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.**

___ NO - "Current Human Exposures" are NOT "Under Control."

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

Completed by (signature) _____ Date 8-12-2013
(print) Dennis P. Piper
(title) Geologist 3, USTRD, LDEQ

Supervisor (signature) _____ Date 7-30-2014
(print) Carey J. Dicharry, Jr.
(title) Geologist Supervisor, USTRD, LDEQ
(EPA Region or State) Louisiana

Locations where references may be found:

LDEQ Electronic Data Management System (EDMS) under AI No. 1293:
*Site Investigation Report, Site Wide Facility Assessment Plan (SWFAP) Implementation;*
ENVIRON International Corporation; September 28, 2012, EDMS Document Nos. 8559220 and 8558706]

Contact telephone and e-mail numbers:

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(phone #) (225) 219-3646
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(e-mail) jhebert@environcorp.com or bbrooks@environcorp.com

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.

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**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**
Interim Final 2/5/99
**RCRA Corrective Action**
**Environmental Indicator (EI) RCRAInfo Code (CA750)**

**Migration of Contaminated Groundwater Under Control**

**Facility Name:** Former Evans Harvey Site
**Facility Address:** 1255 Peters Road, Harvey, LA
**Facility EPA ID #:** LAD008158289

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

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 RCRAINFO national database ONLY as long as they remain true (i.e., RCRAInfo 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):
Analytical results from borehole water samples collected from the Areas of Investigation (AOI-1 and AOI-3) indicated that fourteen constituents were detected with concentrations that exceeded the limiting RECAP Management Option 1 (MO-1) standards: anthracene, Aroclor 1260, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, bis(2-ethylhexyl)phthalate, chrysene, fluoranthene, lead, pentachlorophenol, pyrene,4,4'-DDE and 4,4'-DDT.

Footnotes:

[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):
The hazardous waste unit was certified as closed by removal of all wastes and cleaning the concrete containment area prior to backfilling, negating the potential source of groundwater impacts.
AOI-1: Lead was the only COC detected above the limiting MO-1 RECAP standard (MO-1 RS) at this AOI, however, this anomaly appears to be highly localized based on no exceedances of the MO-1 RS for lead in any of the down-gradient samples. The fate and transport of lead in groundwater thus appears to exhibit evidence of significant retardation and/or lack of mobility. Groundwater issues for this AOI are thus limited to lead in the localized area.
AOI-3: The investigation of June 2012 had three well locations with samples resulting in concentrations above the MO-1 RS, while from the November 2010 investigation, only one location was above an MO-1 RS. All these locations are down-gradient of the site's closed hazardous waste unit. The highest concentrations from either investigation for benzo(a) pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, and pentachlorophenol were detected in June 2012. Concentrations above the Mo-1 RS including the highest AOI concentrations for anthracene, Aroclor 1260, benzo(a)anthracene, chrysene, bis(2-ethylhexyl) phthalate, fluoranthene, pyrene, 4,4'-DDE and 4,4'-DDT were found during the November 2010 investigation. A number of these COCs in the November 2010 sample location were either not detected or were below MO-1 RS in June 2012 down-gradient samples. Conversely, most of the PAHs in the June 2012 results that are above the MO-1 RS are not COCs in November 2010 (pentachlorophenol is an exception). This disparity may be indicative of the effects of historical storm water runoff from heavy vehicular traffic along Peter's Road into the unpaved low-lying areas where the June 2012 sample wells were installed. In order to gather additional data in AOI-3, a well was placed in the same proximity during the June 2012 investigation and samples were taken from the deeper groundwater zone (approximately 25 feet bgs). None of the COCs were detected above the MO-1 RS. Of note, in addition to 5 feet of confining clay between the two zones, the upward vertical gradient from the deeper zone to the shallow zone precludes the potential for downward migration. All of the COCs in shallow groundwater in AOI-3 are relatively immobile and anticipated to attenuate via sorption and bioremediation quickly in high organic soils such as those found at the site.

[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.

__X__ 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):
The potential exposure pathways for groundwater include migration to surface water bodies; however, the nearest down-gradient surface water body is over four miles away at the Intracoastal Waterway. Due to this distance and the various retardation mechanisms in low permeability, highly organic soils as observed in the borings would negate this pathway as being a concern. The potential exposure pathway for groundwater ingestion is not complete based on a water well survey that shows the shallow zone is not used and does not qualify as a potential groundwater source based on low yield.

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): not applicable

[3] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**
Interim Final 2/5/99
**RCRA Corrective Action**
**Environmental Indicator (EI) RCRAInfo Code (CA725)**

**Current Human Exposures Under Control**

**Facility Name:** Former Evans Harvey Site
**Facility Address:** 1255 Peters Road, Harvey, LA
**Facility EPA ID #:** LAD008158289

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, 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 #6 and enter "IN" (more information needed) status code.

## BACKGROUND

### Definition of Environmental Indicators (for the RCRA Corrective Action)

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### Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "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 "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

### Duration / Applicability of EI Determinations

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2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

| | Yes | No | ? | Rationale / Key Contaminants |
|---|---|---|---|---|
| Groundwater | X | | | Contaminants above RECAP MO-1 GW3ndw |
| Air (indoors)[2] | | X | | No structures present on site |
| Surface Soil (e.g., <2 ft | X | | | Contaminants above RECAP MO-1 Soil |
| Surface Water | | X | | Groundwater does not discharge to canal |
| Sediment | | X | | No sediment impacted |
| Subsurf. Soil (e.g., >2 ft) | X | | | Contaminants above RECAP MO-1 Soil |
| Air (outdoors) | | X | | Contaminants are not detected above GWair standard |

____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

__X__ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):
Analytical results from borehole water samples collected from the Areas of Investigation (AOI-1 and AOI-3) indicated that fourteen constituents were detected with concentrations that exceeded the limiting RECAP Management Option 1 (MO-1) Standards: anthracene, Aroclor 1260, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, bis(2-ethylhexyl)phthalate, chrysene, fluoranthene, lead, pentachlorophenol, pyrene,4,4'-DDE and 4,4'-DDT

Analytical results from November 2010 and June 2012 investigations for Areas of Investigation (AOI-1, AOI-2, AOI-3, AOI-5, AOI-6, and AOI-7) indicated that eleven constituents were detected in select soil samples with concentrations that exceeded the limiting soil RECAP Management Option 1 (MO-1) Standards: antimony, Aroclor 1260, arsenic, barium, benzo(a)pyrene, cadmium, chromium, lead, mercury, selenium, and zinc.

Footnotes:

[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 appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

| | Potential **Human Receptors** (Under Current Conditions) | | | | | | |
|---|---|---|---|---|---|---|---|
| **"Contaminated" Media** | Residents | Workers | Day-Care | Construction | Trespassers | Recreation | Food[3] |
| Groundwater | no | no | no | no | | | no |
| ~~Air (indoors)~~ | ___ | ___ | ___ | | | | |
| Soil (surface, e.g., <2 ft) | no | no | no | yes | no | no | no |
| ~~Surface Water~~ | ___ | ___ | | | ___ | ___ | ___ |
| ~~Sediment~~ | ___ | ___ | | | ___ | ___ | ___ |
| Soil (subsurface e.g., >2 ft) | | | | yes | | | no o |
| ~~Air (outdoors)~~ | ___ | ___ | ___ | ___ | ___ | | |

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

_____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

__X__ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and Reference(s):
Engineering and Administrative controls are in place and are proposed to remain in place to prevent exposure pathways from potential completion. The Site is abandoned with no industrial workers on site or planned construction. Soils are beneath concrete and/or aggregate and not exposed to workers or trespassers. Soil containing contaminant levels identified are not in a residential area or commercial area zoned for day care activities. Groundwater is subsurface and within a zone that is not a current or potential source for any public or domestic use, and not beneath any structures. In the event that changes are made to the Engineering or Administrative controls, LDEQ will be notified and the site will be re-evaluated for this indicator.

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

__X__ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):
Engineering and Administrative controls are in place and are proposed to remain in place to prevent exposure pathways from completion. Soils are beneath concrete and/or aggregate and not exposed to workers or trespassers. Soil containing contaminant levels identified are not within a residential area or commercially zoned area. Groundwater is subsurface and within a zone that is not used and not a viable source for any public or domestic use. No structures are present on site that pose an enclosed space scenario for soil/groundwater vapor intrusion. In the event that changes are made to the engineering or administrative controls, LDEQ will reevaluate the site for this indicator.

The only potentially complete pathway is a future construction worker scenario. For the construction worker scenario the exposure pathways for the constituents of concern are all related to dermal contact or accidental ingestion during subsurface excavation all of which are controlled with typical safe work practices for construction at an industrial site.

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):_____

6. Check the appropriate RCRAInfo status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

X YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Former Evans Harvey Site, EPA ID # LAD008158289, located at 1255 Peters Road, Harvey, LA under current and reasonably expected conditions. **This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.**

___ NO - "Current Human Exposures" are NOT "Under Control."

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

Completed by (signature) _____ Date 8-12-2013
(print) Dennis P. Piper
(title) Geologist 3, USTRD, LDEQ

Supervisor (signature) _____ Date 7-30-2014
(print) Carey J. Dicharry, Jr.
(title) Geologist Supervisor, USTRD, LDEQ
(EPA Region or State) Louisiana

Locations where references may be found:

LDEQ Electronic Data Management System (EDMS) under AI No. 1293:
*Site Investigation Report, Site Wide Facility Assessment Plan (SWFAP) Implementation;*
ENVIRON International Corporation; September 28, 2012, EDMS Document Nos. 8559220 and 8558706]

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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.

HZ|RC|TE

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**
Interim Final 2/5/99
**RCRA Corrective Action**
**Environmental Indicator (EI) RCRAInfo Code (CA750)**

**Migration of Contaminated Groundwater Under Control**

**Facility Name:** Former Evans Harvey Site
**Facility Address:** 1255 Peters Road, Harvey, LA
**Facility EPA ID #:** LAD008158289

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

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 RCRAINFO national database ONLY as long as they remain true (i.e., RCRAInfo 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):
Analytical results from borehole water samples collected from the Areas of Investigation (AOI-1 and AOI-3) indicated that fourteen constituents were detected with concentrations that exceeded the limiting RECAP Management Option 1 (MO-1) standards: anthracene, Aroclor 1260, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, bis(2-ethylhexyl)phthalate, chrysene, fluoranthene, lead, pentachlorophenol, pyrene,4,4'-DDE and 4,4'-DDT.

Footnotes:

[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):
The hazardous waste unit was certified as closed by removal of all wastes and cleaning the concrete containment area prior to backfilling, negating the potential source of groundwater impacts.
AOI-1: Lead was the only COC detected above the limiting MO-1 RECAP standard (MO-1 RS) at this AOI, however, this anomaly appears to be highly localized based on no exceedances of the MO-1 RS for lead in any of the down-gradient samples. The fate and transport of lead in groundwater thus appears to exhibit evidence of significant retardation and/or lack of mobility. Groundwater issues for this AOI are thus limited to lead in the localized area.
AOI-3: The investigation of June 2012 had three well locations with samples resulting in concentrations above the MO-1 RS, while from the November 2010 investigation, only one location was above an MO-1 RS. All these locations are down-gradient of the site's closed hazardous waste unit. The highest concentrations from either investigation for benzo(a) pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, and pentachlorophenol were detected in June 2012. Concentrations above the Mo-1 RS including the highest AOI concentrations for anthracene, Aroclor 1260, benzo(a)anthracene, chrysene, bis(2-ethylhexyl) phthalate, fluoranthene, pyrene, 4,4'-DDE and 4,4'-DDT were found during the November 2010 investigation. A number of these COCs in the November 2010 sample location were either not detected or were below MO-1 RS in June 2012 down-gradient samples. Conversely, most of the PAHs in the June 2012 results that are above the MO-1 RS are not COCs in November 2010 (pentachlorophenol is an exception). This disparity may be indicative of the effects of historical storm water runoff from heavy vehicular traffic along Peter's Road into the unpaved low-lying areas where the June 2012 sample wells were installed. In order to gather additional data in AOI-3, a well was placed in the same proximity during the June 2012 investigation and samples were taken from the deeper groundwater zone (approximately 25 feet bgs). None of the COCs were detected above the MO-1 RS. Of note, in addition to 5 feet of confining clay between the two zones, the upward vertical gradient from the deeper zone to the shallow zone precludes the potential for downward migration. All of the COCs in shallow groundwater in AOI-3 are relatively immobile and anticipated to attenuate via sorption and bioremediation quickly in high organic soils such as those found at the site.

[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.

__X__ 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):
The potential exposure pathways for groundwater include migration to surface water bodies; however, the nearest down-gradient surface water body is over four miles away at the Intracoastal Waterway. Due to this distance and the various retardation mechanisms in low permeability, highly organic soils as observed in the borings would negate this pathway as being a concern. The potential exposure pathway for groundwater ingestion is not complete based on a water well survey that shows the shallow zone is not used and does not qualify as a potential groundwater source based on low yield.

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): not applicable

[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): not applicable

[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):
The closed hazardous waste unit is currently in post-closure monitoring. Annual sampling and analysis of groundwater is required.

8. Check the appropriate RCRAINFO 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 Former Evans Harvey Site, EPA ID # LAD008158289, located at 1255 Peters Road, Harvey, LA. 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) _____ Date 8-12-2013
(print) Dennis P. Piper
(title) Geologist 3, USTRD, LDEQ

Supervisor (signature) _____ Date 8-8-2013
(print) Carey J. Dicharry, Jr.
(title) Geologist Supervisor, USTRD, LDEQ
(EPA Region or State) Louisiana

Locations where references may be found:

LDEQ Electronic Data Management System (EDMS) under AI No. 1293:
*Site Investigation Report, Site Wide Facility Assessment Plan (SWFAP) Implementation;*
ENVIRON International Corporation; September 28, 2012, EDMS Document Nos. 8559220 and 8558706]

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