

**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:** Blue Ridge Talc Co  
**Facility Address:** 3800 Original Henry Road, Henry, VA 24102  
**Facility EPA ID #:** VAD003124625

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 #8 and enter "IN" (more information needed) status code.

**BACKGROUND**

The Blue Ridge Talc facility is comprised of four parcels of property totaling 20 acres and is located at the intersection of State Routes 605 and 606 in Henry County, VA. The northern portion of the site is located in Franklin County. The facility was owned by the Kitson family and was active from the late 1800's to 2002. Activities included the processing of pigments and manufacturing of paint. Facility operations were shutdown in 2002. Blue Ridge Solvents currently owns the northern most parcel of the site, Mr. Prillaman owns the parcel adjacent to Blue Ridge Solvents, and the Kitson family still maintains ownership of the remainder of the facility properties. In 2007, the EPA and DEQ conducted a site visit and identified 13 solid waste management units (SWMUs). SWMUs include drum storage areas, satellite accumulation areas, underground storage tanks (USTs), septic tanks, and two disposal areas that were cleaned up in accordance with the Virginia Hazardous Waste Management Regulations.

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

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

**Definition of "Migration of Contaminated Groundwater Under Control" EI**

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

**Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

**Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

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1. 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.
- 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):**

Since 1993, shallow groundwater beneath the facility has been investigated under several regulatory cleanup programs including the Voluntary Remediation Program (VRP), RCRA closure, UST Program, and RCRA Corrective Action. Most notable, in 1998 cleanup of SWMU 1 and SWMU 2 in accordance with RCRA hazardous waste closure requirements began. During closure, groundwater results for monitoring well MW-7 indicated that naphthalene was present in groundwater. Subsequently, an Alternate Source Demonstration (ASD) was performed and indicated that a UST was the source of the naphthalene. Following closure, the USTs were investigated and addressed under the UST program. Activities included tank removal, soil excavation, and groundwater remediation to reduce levels of petroleum related constituents such as benzene, toluene, ethylbenzene, xylenes (BTEX), and naphthalene. Bioremediation of contaminated groundwater occurred from 2003 to 2007, at which time remedial goals set by the UST program were met.

In 2014, the Army Corps of Engineers conducted a site wide groundwater sampling event in order to characterize the current groundwater conditions under the RCRA Corrective Action Program. Groundwater samples were analyzed for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) including polynuclear aromatic hydrocarbons (PAHs). Results indicated that BTEX was detected at concentrations below drinking water standards. Naphthalene was detected in one monitoring well (MW-2) at a concentration of 1.24 ug/L when analyzed by EPA SW-846 Method 8260B, which is above conservative Regional Screening Levels (RSLs) for tap water. However, naphthalene was not detected when analyzed by Method 8270D. 1-Methylnaphthalene was detected in MW-7, MW-11, MW-14, and MW-16 at concentrations above RSLs as well. In addition, several PAHs were detected in MW-13 at elevated concentrations above RSLs. MW-13 is located within the area of the removed USTs. Based on the sample results of the monitoring wells surrounding MW-13, the lateral extent of groundwater contaminants is very limited. In addition, the facility’s production water supply well was sampled and analyzed for VOCs and SVOCs. The well is located in vicinity of MW-13 and is an open bore well approximately 190 feet below ground surface within the bedrock. Results indicate that petroleum related constituents were not detected above method detection limits. In 2015, an additional site wide groundwater sampling event was conducted. Results similar to the 2014 event were obtained during this event for dissolved phase contaminants and residual free phase LNAPL was observed on top of groundwater in MW-13. LNAPL was not observed in the other wells monitored during this event. The LNAPL appeared degraded and was not present in significantly recoverable amounts.

Results of these sampling events indicate that groundwater contaminants observed above RSLs have attenuated since initially observed in 2003 and will likely continue to attenuate although minimal LNAPL was observed in one monitoring well. In addition, these results confirm the limited horizontal and vertical extent of the contaminants and indicate that practically no migration has occurred since 2003.

**Supporting Documentation:**

1. Site Assessment Report, Army Corps of Engineers, April 6, 2015
2. Site Assessment Report, Army Corps of Engineers, September 12, 2014
3. Department of Environmental Quality’s UST Program files, 1996-2007
4. Site Characterization Report/Remedial Action Plan, Olver Laboratories Inc., June 1, 1999

**Footnotes:**

<sup>1</sup>“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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2. 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):**

The groundwater remediation completed under the DEQ tank program from 2003 to 2007 and site assessment events performed by the Army Corps of Engineers is described above. Based on the results of these activities, a number of contaminants in groundwater including BTEX and naphthalene have attenuated. Results also indicate that additional contaminants including SVOCs have either stabilized or attenuated.

Groundwater monitoring will be conducted periodically in the future to verify stability and evaluate ongoing attenuation and/or dissipation of contaminants present in groundwater.

**References:**

1. Site Assessment Report, Army Corps of Engineers, April 6, 2015
2. Site Assessment Report, Army Corps of Engineers, September 12, 2014
3. Department of Environmental Quality’s UST Program files, 1996-2007

<sup>2</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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3. 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):**

During the completion of the 1999 site characterization conducted in accordance with DEQ’s Voluntary Remediation Program and remedial activities conducted from 2003 to 2007, modeling was conducted using BioScreen to identify the potential for groundwater contaminants to migrate to and impact the creek adjacent to the site to the southeast. Modeling indicated that there was little to no potential for this to occur.

During the two site assessment events performed by the Corps of Engineers, surface water samples were collected and analyzed for VOCs, SVOCs, and PAHs. Results indicated that site related contaminants were not detected above laboratory method detection limits.

**References:**

1. Site Assessment Report, Army Corps of Engineers, April 6, 2015
2. Site Assessment Report, Army Corps of Engineers, September 12, 2014
3. Department of Environmental Quality’s UST Program files, 1996-2007
4. Site Characterization Report/Remedial Action Plan, Olver Laboratories Inc., June 1, 1999

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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 judgment/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 concentration<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):**

<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):**

<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):**

It is anticipated that groundwater monitoring will periodically be performed in the future to verify stability and evaluate ongoing attenuation and/or dissipation of contaminants in shallow groundwater. DEQ and EPA will coordinate with the applicable property owners to implement a monitoring network and program that enables evaluation of deep groundwater conditions at the process water supply well in addition to shallow groundwater conditions.

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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).

- 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 Blue Ridge Talc facility, EPA ID # VAD003124625, located at 3800 Original Henry Rd., Henry, VA 24102. 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) *Brett Fisher*      Date 5-29-2015  
                          (print) Brett Fisher, P.G.  
                          (title) Technical Reviewer – CA/GW

Supervisor        (signature) *Jutta Schneider*      Date 5-29-2015  
                          (print) Jutta Schneider  
                          (title) Acting Director - ORP  
                          (EPA Region or State) VA

Locations where References may be found:

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

Virginia Department of Environmental Quality  
Office of Remediation Programs  
629 East Main Street  
Richmond, VA 23219

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