

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: Geneva Steel, LLC

Facility Address: 10 South Geneva Road, Vineyard, Utah/P.O. Box 2500 Provo, Utah 84603

Facility EPA ID #: UTD009086133

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 "TN" (more information needed) status code.

**BACKGROUND**

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

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

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

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

**Relationship of EI to Final Remedies**

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

**Duration / Applicability of EI Determinations**

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

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2. Is **groundwater** known or reasonably suspected to be “contaminated”<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?

  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):**

Location	Date	Chemical	Action Level (MCLs <sup>1</sup> , Region III RBCs <sup>2</sup> , Utah DERR Tier 1 SL <sup>3</sup> )	Maximum Detected
GPW-68	July 11, 2000	Benzene	5 ug/L <sup>1</sup>	780,000 ug/L
PZ-07S	September 16, 1997	Arsenic	10 ug/L <sup>1</sup>	1,000 ug/L
SWMUG-2.19/2.01	September 28, 1995	Lead	15 ug/L <sup>1</sup>	2,500 ug/L
SWMUG-2.13	September 13, 1995	PAH (BaP)	0.2 ug/L <sup>1</sup>	88 ug/L
SWMUG-2.19/2.01	September 28, 1995	Cadmium	5 ug/L <sup>1</sup>	200 ug/L
SWMUG-2.19/2.01	September 28, 1995	Chromium (total)	100 ug/L <sup>1</sup>	3,900 ug/L
SWMUG-3.03	October 16, 1995	TPH (DRO)	10 mg/L <sup>3</sup>	191 mg/L
GPW-59	July 12, 2000	Naphthalene	6.5 ug/L <sup>2</sup>	8190 ug/L
SWMUG-2.19/2.01	September 25, 1995	Free Cyanide	200 ug/L <sup>1</sup>	1,500 ug/L

<sup>1</sup> – Maximum Contaminant Level from EPA National Primary Drinking Water Standards, downloaded 8/30/2005

<sup>2</sup> – EPA Region III Risk-Based Concentrations Table, April 7, 2005

<sup>3</sup> – Utah Division of Environmental Response and Remediation Risk-Based Corrective Action Tier 1 Screening Levels, July 11, 2000

**References:**

Final RFI Task III – Part 4, Screening Investigation Report, Geneva Steel Facility, EPA ID No. UTD009086133, prepared by CH2M HILL, February 29, 1996.

Data Summary Report for July 2000 Groundwater Investigations at the Geneva Steel Facility, prepared by CH2M HILL, December 2000.

Perimeter-In Groundwater Monitoring Program Data for 1997, 1998, 2000, and 2003, received from CH2M HILL.

Perimeter-In Groundwater Monitoring Program Groundwater Conditions Report for August 2004, prepared by URS Corporation, January 2005.

Perimeter-In Groundwater Monitoring Program Groundwater Conditions Report for December 2004, prepared by

<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).

URS Corporation, July 15, 2005.

Sentry Well Installation and Groundwater Investigation Report for November 2004, prepared by URS Corporation, August 19, 2005.

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within “existing area of contaminated groundwater”<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?

  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”<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):**

- 1) Closed Hazardous Waste Impoundments
  - a. Treatment system in place, with gradient control demonstrating full capture
- 2) Benzol Plant/Quench Pond Area
  - a. Sentry well in place ahead of plume, sources (tanks) removed and/or emptied
- 3) Oil Reclamation Area
  - a. Benzene has been detected in MW-106S, a perimeter well.
  - b. Concentrations have greatly decreased (see table below), indicating stabilization and shrinking of the plume.
  - c. Work is ongoing under an approved interim action to remove source area soils.
  - d. Groundwater treatment is in the design phase, which may include natural attenuation.
  - e. Groundwater may discharge to surface water in the Final Retention Pond (see Section 4).

Location	Chemical	Action Level (MCLs, Region III RBCs)	Concentration	Date
MW-106S	Benzene	5 ug/L	1,100 ug/L	9/11/1997
MW-106S	Benzene	5 ug/L	12,000 ug/L	6/15/1998
MW-106S	Benzene	5 ug/L	550 ug/L	7/19/2000
MW-106S	Benzene	5 ug/L	<1 ug/L	6/26/2003
MW-106S	Benzene	5 ug/L	68 ug/L	8/23/2004
MW-106S	Benzene	5 ug/L	<1 ug/L	12/15/2004

<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.

**References:**

Perimeter-In Groundwater Monitoring Program Data for 1997, 1998, 2000, and 2003, received from CH2M HILL.

Perimeter-In Groundwater Monitoring Program Groundwater Conditions Report for August 2004, prepared by URS Corporation, January 2005.

Perimeter-In Groundwater Monitoring Program Groundwater Conditions Report for December 2004, prepared by URS Corporation, July 15, 2005.

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4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

  **X**   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):**

Impacted groundwater at the Oil Reclamation Area (MW-106S, see Section 3) may have previously discharged into Geneva Steel's Final Retention Pond (FRP). The FRP is the final treatment area for surface water, prior to UPDES (NPDES)-permitted discharge to Utah Lake.

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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)?

  X   If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

\_\_\_\_\_ If no - (the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations<sup>3</sup> greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

\_\_\_\_\_ If unknown – enter “IN” status code in #8.

**Rationale and Reference(s):**

Discharge to Geneva Steel’s Final Retention Pond is insignificant because the groundwater concentrations in nearby perimeter well MW-106S have greatly decreased (non detect in 2 of 3 most recent events, including the most recent – see Section 4). In addition, the Final Retention Pond is part of Geneva Steel’s surface water treatment and discharge to Utah Lake is under an UPDES (NPDES) permit. Sampling is performed at the final outfall (Outfall 1) to assess water quality. Discharge of impacted groundwater is not expected to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

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<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):**

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<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?”

  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):**

- 1) Closed Hazardous Waste Impoundments
  - a. Semiannual monitoring of the monitoring well network (MW-1, MW-5, MW-8, MW-9, MW-10, MW-12, MW-13, MW-14, MW-17, MW-19, MW-21, MW-22, MW-23, MW-24) will continue throughout the post-closure period (see Post-Closure Permit UTD009086133, May 14, 2004).
- 2) Benzol Plant/Quench Pond Area
  - a. Sentry well PZ-05S is down-gradient and is included in the Perimeter-in Groundwater Monitoring Program (see Perimeter-In Groundwater Monitoring Program Groundwater Conditions Report for December 2004, prepared by URS Corporation, July 15, 2005).
- 3) Oil Reclamation Area
  - a. Well MW-106S is down-gradient and is included in the Perimeter-in Groundwater Monitoring Program (see Perimeter-In Groundwater Monitoring Program Groundwater Conditions Report for December 2004, prepared by URS Corporation, July 15, 2005). Additional groundwater monitoring will be conducted during the remediation phase, which may include additional monitoring points.

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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

  X   YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Geneva Steel, LLC facility, EPA ID #UTD009086133, located at 10 South Geneva Road, Vineyard, Utah. 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 3/21/06  
(print) ERIC BAIDEN, Ph.D., P.G.  
(title) ENVIRONMENTAL SCIENTIST

Supervisor (signature)  Date 3/22/06  
(print) Allan Moore  
(title) Env. Program Manager  
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**Locations where References may be found:**

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