

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: ATK - Thiokol Propulsion - Bacchus Works  
Facility Address: P.O. Box 98, Magna, Utah 84044-0098  
Facility EPA ID #: UTD001705029

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?

Yes 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 "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?

**Yes** 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):**

Following the installation of the initial groundwater monitoring system in 1985 ATK - Thiokol Propulsion, Bacchus Works (ATK), formerly Hercules Incorporated, determined that hazardous waste and hazardous waste constituents had been released to the environment and are seen in the groundwater. Within the groundwater contamination plume there are places, both on- and off-site, where the contaminant concentrations exceed appropriate protection standards. The RCRA Facility Assessment (RFA) identified 96 SWMUs (solid waste management units) and recommended that 77 be investigated further to determine the magnitude and extent of the contamination.

On August 16, 1988, the State of Utah and ATK entered into an agreement (Stipulation and Consent Order, #8606396) to conduct corrective action at the Bacchus Works. In accordance with the provisions outlining interim corrective measures in paragraph 20 of the Consent Order, ATK has investigated and addressed a number of SMWUs needing further investigation.

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<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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**Table 2A - COCs & Maximum Concentrations  
Observed**

Contaminant	Primary COC	Secondary COC	On-Site Contaminant	Off-Site Contaminant	Maximum Concentration Detected (ug/l)
Trichloroethylene (TCE)	X		X	X	900
1,1,1-Trichloroethane (TCA)	X		X	X	140
1,1-Dichloroethylene (DCE)	X		X	X	190
1,1-Dichloroethane (DCA)	X		X		6
Perchlorate	X		X	X	6967
1,1,2-Trichloro-1,2,2 - Trifluoroethane (Freon 113)	X		X	X	1800
trans-1,2-Dichloroethylene			undetected		-
Chloroform		X	X		25
Ethyl Chloride		X	undetected		-
Vinyl Chloride		X	undetected		-
Hexahydro-1,3,5-Trinitro- 1,3,5-Triazine (RDX)		X	X		8.1
Cyclotetramethylene - Tetranitramine (HMX)		X	X		65.7
Nitrate/Nitrite		X	X		44 mg/l
Nitroglycerin		X	X		5.3

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The information in Table 2B identifies the applicable drinking water standards that apply to the COCs.

**Table 2B - Drinking Water Standards**

Contaminant	Health Advisories							
	MCL (mg/l)	MCLG (mg/l)	DWEL (mg/l)	Lifetime Exposure (mg/l)	10 <sup>-4</sup> Cancer Risk (mg/l)	10 <sup>-6</sup> Cancer Risk (mg/l)	Region IX PRGs (ug/l)	
Hexahydro-1,3,5-Trinitro-1,3,5-Triazine (RDX)	-	-	0.1	0.002	0.03	-	10	0.61
Cyclotetramethylene-Tetranitramine (HMX)	-	-	2	0.4	-	-	-	1800
Trichloroethylene (TCE)	0.005	0	0.2	-	0.02	1 - 3	3.2 - 30	1.6
1,1,1-Trichloroethane (TCA)	0.2	0.2	1	0.2	-	30	200 - 600	790
1,1-Dichloroethylene (DCE)	0.007	0.007	0.4	0.007	-	2 - 6	6 - 7	0.046
1,1-Dichloroethane (DCA)	0.005	0	-	-	0.06	5 - 50	5 - 850	810
Perchlorate	-	-	-	-	-	-	18	18
1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon113)	-	-	-	-	-	1200	190 - 500 (mg/l)	59,000
trans-1,2-Dichloroethylene	0.1	0.1	0.7	0.1	-	10	60 - 100	120
Chloroform	0.08	0	0.4	-	0.001	-	0.49 - 60	0.16
Ethyl Chloride	-	-	0.1	0.003	-	-	140 - 400	4.6
Vinyl Chloride	0.002	0	-	-	0.002	0.2 - 2	0.015 - 2	0.02
Nitrate/Nitrite	10	10	-	-	-	-	-	10,000
Nitroglycerin	-	-	0.005	-	-	-	5	4.8

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

If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"<sup>2</sup>.

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup>) - skip to #8 and enter "NO" status code, after providing an explanation.

**IN** If unknown - skip to #8 and enter "IN" status code.

**Rationale and Reference(s):**

In June 2001, ATK submitted Groundwater Flow and Contaminant Transport Model, a report on efforts that ATK undertook to demonstrate that the migration of contaminated groundwater had stabilized. This report is currently under review.

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

Yes If yes - continue after identifying potentially affected surface water bodies.

If no - skip to #7 (and enter a "VE" 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 springs and seeps around the NIROP Burning Grounds create a 'wetland' that discharges to Coon Creek as it leaves the Bacchus Works facility. Samples collected from the seeps and springs indicate that they have been impacted by contamination.

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5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

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

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

IN If unknown - enter "IN" status code in #8.

**Rationale and Reference(s):**

The contaminants are consistent with the groundwater contamination, but the contaminant concentrations are not as well defined as in the groundwater. In order to fully assess this question the Division of Solid and Hazardous Waste will need to review the recent analytical data from the seeps and springs, and determine the contaminant concentrations, if any, as this water leaves the Bacchus Works facility.

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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.

**IN** If unknown - skip to 8 and enter "IN" status code.

**Rationale and Reference(s):**

See the response to Comments #5 above.

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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?"

**Yes** If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations that 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):**

**At the present time, the Division anticipates that monitoring activities will continue on a routine basis.**

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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 ATK - Thiokol Propulsion, Bacchus Works facility, EPA ID # UTD001705029, located at P.O. Box 98, Magna, Utah 84044-0098. 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 IN - More information is needed to make a determination.

Completed by	(signature)	<i>W M Wallner</i>	Date	10/4/2002
	(print)	William M. Wallner		
	(title)	Environmental Scientist		

Supervisor	(signature)	<i>Bradley C. Maulding</i>	Date	10/4/02
	(print)	Bradley C. Maulding		
	(title)	Environmental Program Manager		
	(EPA Region or State)	Utah		

Locations where References may be found:  
All reference materials used to complete this Environmental Indicator form are located in the Division of Solid and Hazardous Waste files.

Contact telephone and e-mail numbers

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