DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: Murphy Oil USA
Facility Address: 2500 St. Bernard Highway, Meraux, Louisiana
Facility EPA ID #: LAD 008058471, AI# 1238

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).

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Current Human Exposures Under Control

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	___	See Appendix A
Air (indoors) [2]	___	X	___	See Appendix A
Surface Soil (e.g., <2 ft)	___	X	___	See Appendix A
Surface Water	___	X	___	See Appendix A
Sediment	___	X	___	See Appendix A
Subsurf. Soil (e.g., >2ft)	___	X	___	See Appendix A
Air (outdoors)	___	X	___	See Appendix A

__X__ 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.

_____ 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): **The Murphy Oil USA Meraux Refinery (MOUSA) maintains three Solid Waste Management Units (SWMUs) and one Interim-Status Hazardous Waste Management Unit. The SWMUs include the Storm Surge Basin, which has been formally closed (January 2001), Secondary Storm Water Basins and the Equalization Basin. The Secondary Storm Water and Equalization Basins are currently active. The Interim-Status Hazardous Waste Unit is a former Land Treatment Unit (LTU), which is awaiting regulatory approval to proceed with closure plan implementation. Table 725-1 summarizes the SWMUs or regulated units and their status.**

Ground water monitoring has been performed regularly in association with the four regulated units since 1981 for the SWMUs and 1993 for the LTU. The ground water monitoring system at MOUSA consists of the wells specifically associated with each SWMU, plus several perimeter wells not associated with a specific unit and designated facility wells. Facility wells are regularly monitored for general water quality parameters (e.g., pH, specific conductance). Wells associated with the SWMUs and LTU are regularly monitored for specific constituents. Unsaturated zone soil monitoring is also performed annually at the LTU. These data, in combination with facility release documentation and air quality data, provide the basis for conclusions regarding control of human exposure.

Ground water monitoring includes a site-specific list of indicator parameters including inorganics, volatile and semivolatile organics, and general water quality parameters. The ground water monitoring data for all units have been consistently non-detect for organic indicator parameters since 1993, with very few (anomalous) exceptions. Inorganic constituent concentrations are similar in upgradient and downgradient wells. A permit-required statistical evaluation of ground water monitoring data was performed in October 1997 for the three SWMUs and concluded that organic compounds were reported below quantitation limits or tolerance limits and inorganics were reported at concentrations below background tolerance limits. Thus, no impact to ground water was statistically evident. No evidence of impact has been identified between the 1997 statistical report and present.

Specifically for the LTU, the soil and ground water data available for the unit underwent a preliminary evaluation relative to the LDEQ RECAP risk-based standards when evaluating closure options.

Concentrations reported in soil and groundwater were found to be less than site-specific RECAP standards, indicating no contamination above risk-based levels.

Relative to air exposure, no enclosed structures are present over or in close proximity to the units. MOUSA maintains air monitoring records associated with personnel monitoring, response to incidental release and response to sensory observations. MOUSA was selected to participate in the EPA Survey of Surface Impoundments in February 2000, which included chemical characterization of surface impoundment water and underlying sludge for the purpose (in part) of estimating air emissions from the active basins. Based upon available data, MOUSA has not identified releases to air associated with the regulated units addressed herein in excess of relevant or appropriate human health standards.

Environmental media are not reasonably suspected to be impacted above site-specific risk-based levels, based on absence of detectable constituents or concentrations preliminarily demonstrated to be below RECAP standards. Detailed discussions of the status and condition of each of the three SWMUs and the LTU are contained in Appendix A. Appendix B contains figures associated with this submittal. The location of the SWMUs and the LTU are shown on Figure B-1. Monitor well locations are shown on Figure B-2, and Figure B-3 is a representative potentiometric surface map from November 1999.

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.

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

TABLE 725-1

SWMUs and Regulated Units
Murphy Oil USA
Meraux Refinery

Unit	Status
Land Treatment Unit (LTU)	U
Secondary Storm Water Basins	A
Equalization Basin	A
Storm Surge Basin	C

Notes:

Status Codes:
A = Active
U = Undergoing Closure (awaiting regulatory approval to proceed with closure plan implementation)
C = Closed

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Current Human Exposures Under Control

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]

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).

_____ 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.

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

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Current Human Exposures Under Control

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)?

   _____ 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

[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

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

6. Check the appropriate RCRIS 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):

__YE__ 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 Murphy Oil USA facility, EPA ID # LAD008058471, AI#1238, located at Meraux, Louisiana 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) Karl Fohn Date 6/28/01
(print) Karl M. Fohn
(title) Geologist 2

Supervisor (signature) [illegible] Date 6/28/01
(print) Narendra M. Dave
(title) Geological Manager
(EPA Region or State) Louisiana

Locations where References may be found:

LDEQ Hazardous Waste Division Files
LDEQ Solid Waste Division Files
LDEQ Ground Water Protection Division Files
On-site facility records and correspondence files

Contact telephone and e-mail numbers

(name) Karl Fohn
(phone #) (225) 765-0630
(e-mail) Karlf@DEQ.STATE.LA.US

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.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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

Migration of Contaminated Groundwater Under Control

Facility Name: Murphy Oil USA
Facility Address: 2500 St. Bernard Highway, Meraux, Louisiana
Facility EPA ID #: LAD 008058471, AI# 1238

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 #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).

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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

Migration of Contaminated Groundwater Under Control

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

_____ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

__X__ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

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

Rationale and Reference(s): **The Murphy Oil USA Meraux Refinery (MOUSA) maintains three Solid Waste Management Units (SWMUs) and one Interim-Status Hazardous Waste Management Unit. The SWMUs include the Storm Surge Basin, which has been formally closed, Secondary Storm Water Basins and the Equalization Basin. The Storm Water and Equalization Basins are currently active. The Interim-Status Hazardous Waste Unit is a former Land Treatment Unit (LTU), which is awaiting regulatory approval to proceed with closure plan implementation. Table 750-1 summarizes the SWMUs or regulated units and their status.**

Ground water monitoring has been performed regularly in association with the four regulated units since 1981 for the SWMUs and 1993 for the LTU. With LDEQ concurrence, modifications to the monitoring program (e.g., sampling frequency, analytical suite, and statistical methods) occurred between 1981 and 1993, and the program has been similar in routine since 1993. The ground water monitoring system at MOUSA consists of the wells specifically associated with each SWMU, plus several perimeter wells not associated with a specific unit and designated facility wells. Facility wells are regularly monitored for general water quality parameters (e.g., pH, specific conductance). Wells associated with the SWMUs and LTU are regularly monitored for specific constituents. These data, in combination with facility release documentation, provide the basis for conclusions regarding control of ground water migration.

Ground water monitoring includes a site-specific list of indicator parameters including inorganics, volatile and semivolatile organics, and general water quality parameters. The ground water monitoring data for all units have been consistently non-detect for organic indicator parameters since 1993, with very few (anomalous) exceptions. Inorganic constituent concentrations are similar in upgradient and downgradient wells. A permit-required statistical evaluation of ground water monitoring data was performed in October 1997 for the three SWMUs and concluded that organic compounds were reported below quantitation limits or tolerance limits and inorganics were reported at concentrations below background tolerance limits. Thus, no impact to ground water was statistically evident. No evidence of impact has been identified between the 1997 statistical report and present.

Specifically for the LTU, the ground water data available for the unit underwent a preliminary evaluation relative to the LDEQ RECAP risk-based standards when evaluating closure options. Concentrations in ground water were found to be less than site-specific RECAP standards, indicating no contamination above risk-based levels.

Ground water associated with the three aforementioned SWMUs and regulated units is not reasonably suspected to be impacted above site-specific risk-based levels, based on absence of detectable constituents or concentrations demonstrated to be below statistically established background levels or site-specific RECAP

standards. Therefore, there are no areas of known or suspected affected ground water above appropriate protective levels associated with the three SWMUs or the LTU at the MOUSA Refinery in Meraux.

Detailed discussions of the status and condition of each of the three SWMUs and the LTU are contained in Appendix E. Appendix B contains figures associated with this submittal. The location of the SWMUs and the LTU are shown on Figure B-1. Monitor well locations are shown on Figure B-2, and Figure B-3 is a representative potentiometric map from November 1999.

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).

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

TABLE 750-1

SWMUs and Regulated Units
Murphy Oil USA
Meraux Refinery

Unit	Status
Land Treatment Unit (LTU)	U
Secondary Storm Water Basins	A
Equalization Basin	A
Storm Surge Basin	C

Notes:

Status Codes:
A = Active
U = Undergoing Closure (awaiting regulatory approval to proceed with closure plan implementation)
C = Closed

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

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)?

_____ 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.

[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.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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

Migration of Contaminated Groundwater Under Control

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

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

_____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

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

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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

Migration of Contaminated Groundwater Under Control

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):_____

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

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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

Migration of Contaminated Groundwater Under Control

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):_____

_____

_____

_____

_____

[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.

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Migration of Contaminated Groundwater Under Control

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):_____

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

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__ 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 Murphy Oil USA facility, EPA ID # LAD 008058471, AI#1238, located at Meraux, Louisiana. 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) [signature] Date 6/28/01
(print) Karl Fohn
(title) Geologist 2

Supervisor (signature) [signature] Date 6/28/01
(print) Narendra Dave
(title) Geological Manager
(EPA Region or State) Louisiana

GPDM
6/29/05

Locations where References may be found:

LDEQ Hazardous Waste Division Files
LDEQ Solid Waste Division Files
LDEQ Ground Water Protection Division Files
On-site facility records and correspondence files

Contact telephone and e-mail numbers

(name) Karl Fohn
(phone #) (225) 765-0630
(e-mail) Karlf@DEQ.STATE.LA.US

Attachments Available
Upon Request