

NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS BRANCH
BASE MAINTENANCE DIVISION
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542

16 Dec 81

Date

From: Director

To: Danny

Subj: See attached

1.

What does this letter require?

I thought the last letter stated
we didn't have to sample.

Juhain

Does not
Apply to (full)
US. we do not
dispose on Base
Shun

12-17-81

File Hay Waste
JLW



6240

Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

December 11, 1981

Danny Sharpe, Ecologist
I.D.# NC6170022580
Marine Corps Base Camp Lejeune
N.C. Hwy. 24 & U.S. Hwy. 16
Camp Lejeune, NC 28542

Dear Sir:

The purpose of this letter is to clarify regulations concerning ground-water quality monitoring at hazardous waste facilities. This is a follow-up to the October 21, 1981, notification of monitoring requirements concerning sample parameters, frequencies and reporting requirements.

The monitoring wells at your facility must be sampled and analyzed each quarter for the parameters listed under I, II and III in Appendix A. For each of the upgradient wells, four replicate measurements are to be taken quarterly for each of the parameters listed under III in Appendix A. Only one measurement of these parameters (III) will be required quarterly for each of the downgradient wells.

For the first year, November, 1981 to November, 1982, the results from analyses of the parameters listed under I in Appendix A must be submitted to this office within fifteen (15) days of the completion of each quarterly analysis. After November, 1982, the parameters listed under I in Appendix A will not be required.

After the first year of sampling has been completed, all monitoring wells, up-gradient and downgradient, must be sampled twice per year for the parameters listed under III and once per year for the parameters listed under II in Appendix A.

The results from these analyses must be compared to the background water quality data developed during the first year of monitoring. Information on the determination of background water quality, the arithmetic mean and variance, can be found under Part 265.93(b) in Appendix B.

The outline of your ground-water quality assessment program (Part 265.93(a) Appendix B) should also include any parameter which will be added based on the waste type at your facility. This may be determined by identifying your EPA hazardous waste code numbers in Appendix C. Appendix C contains a list of constituents which are the basis for listing a particular process. In addition to the Appendix C parameters, any constituent(s) used in your process as listed in Appendix D or any other known characteristic parameter(s) of your waste must be included in the ground-water quality assessment program. This will determine whether any hazardous wastes or hazardous waste constituents have entered the ground-water.

A more detailed description of the ground-water quality assessment program along with a sample program is given in Appendix E.

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The analyses of all parameters evaluated for the ground-water quality monitoring program as well as information required under Part 265.93(d), concerning contaminant detection, must be submitted to this office annually on or about November 19 of each year.

Should you have any questions concerning this information or wish to submit analytical results, please contact:

Gary D. Babb, Geologist
Solid & Hazardous Waste Management Branch
Division of Health Services
P. O. Box 2091
Raleigh, NC 27602
(919) 733-2178

Very truly yours,



O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

GDB:ns
Enclosures (5)

APPENDIX A

I. EPA Interim Primary Drinking Water Standards*

Arsenic	Lindane
Barium	Methoxychlor
Cadmium	Toxaphene
Chromium	2,4-D
Fluoride	2,4,5-TP Silvex
Lead	Radium
Mercury	Gross Alpha
Nitrite (as N)	Gross Beta
Selenium	Turbidity (Surface Waters)
Silver	Coliform Bacteria
Endrin	

*Maximum allowable concentrations can be found in the May 19, 1980 Federal Register, Appendix III, page 33257.

II. Ground-Water Quality Parameters*

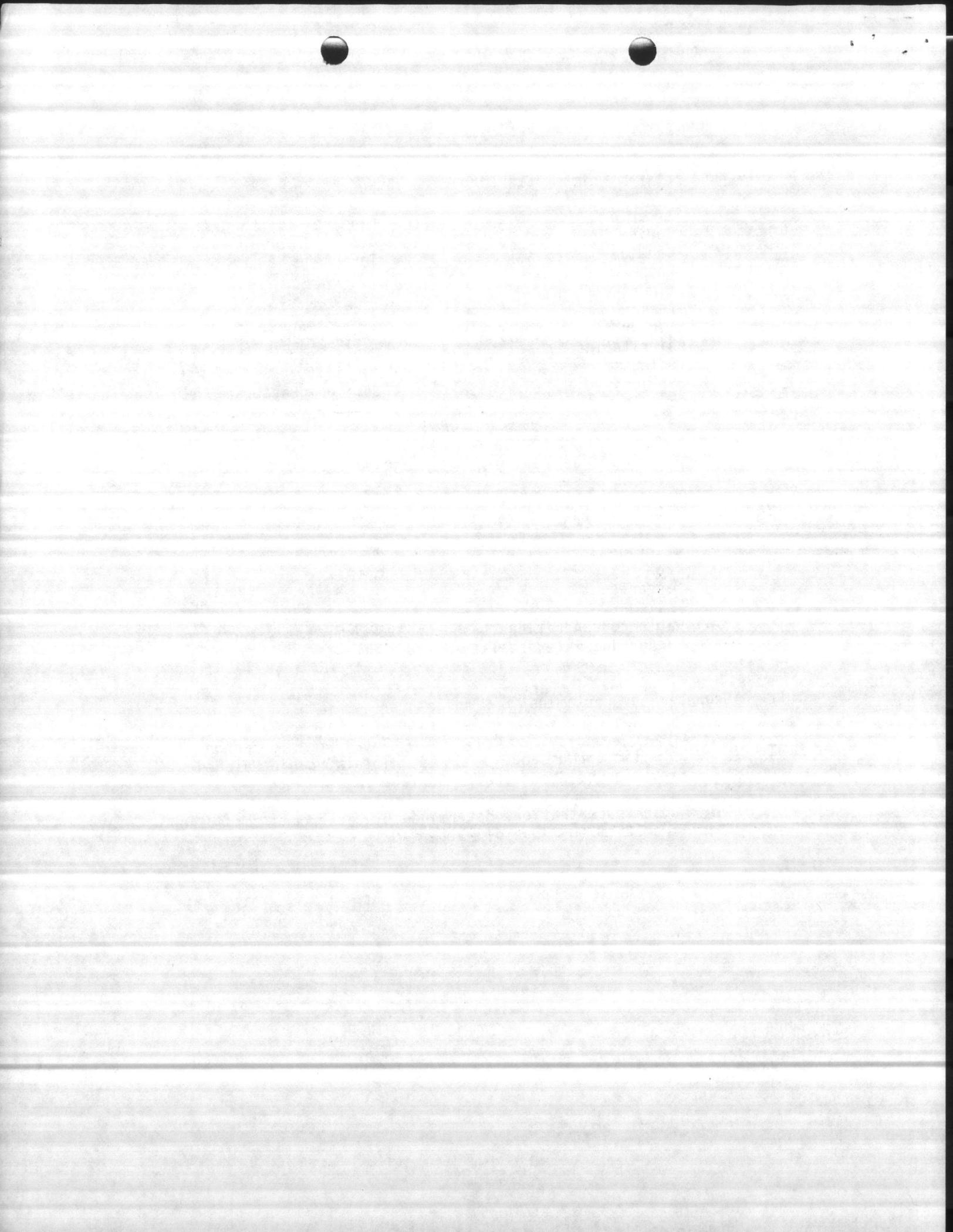
Chloride	Phenols
Iron	Sodium
Manganese	Sulfate

*Allowable concentrations based on 1962 Drinking Water Standards and background water quality data.

III. Ground-Water Contamination Indicators*

pH	Total Organic Carbon
Specific Conductance	Total Organic Halogen
Elevation of Ground-Water Surface	

*Allowable concentrations determined by background comparison, see Part 265.93(b) Appendix B.



§ 265.90 Applicability.

(a) Within one year after the effective date of these regulations, the owner or operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste must implement a ground-water monitoring program capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility, except as § 265.1 and paragraph (c) of this Section provide otherwise.

(b) Except as paragraphs (c) and (d) of this Section provide otherwise, the owner or operator must install, operate, and maintain a ground-water monitoring system which meets the requirements of § 265.91, and must comply with §§ 265.92–265.94. This ground-water monitoring program must be carried out during the active life of the facility, and for disposal facilities, during the post-closure care period as well.

(c) All or part of the ground-water monitoring requirements of this Subpart may be waived if the owner or operator can demonstrate that there is a low potential for migration of hazardous waste or hazardous waste constituents from the facility via the uppermost aquifer to water supply wells (domestic, industrial, or agricultural) or to surface water. This demonstration must be in writing, and must be kept at the facility. This demonstration must be certified by a qualified geologist or geotechnical engineer and must establish the following:

(1) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer, by an evaluation of:

(i) A water balance of precipitation, evapotranspiration, runoff, and infiltration; and

(ii) Unsaturated zone characteristics (i.e., geologic materials, physical properties, and depth to ground water); and

(2) The potential for hazardous waste or hazardous waste constituents which enter the uppermost aquifer to migrate to a water supply well or surface water, by an evaluation of:

(i) Saturated zone characteristics (i.e., geologic materials, physical properties, and rate of ground-water flow); and

(ii) The proximity of the facility to water supply wells or surface water.

(d) If an owner or operator assumes (or knows) that ground-water monitoring of indicator parameters in accordance with §§ 265.91 and 265.92 would show statistically significant increases (or decreases in the case of pH) when evaluated under § 265.93(b), he may, install, operate, and maintain an alternate ground-water monitoring system (other than the one described in §§ 265.91 and 265.92). If the owner or operator decides to use an alternate

ground-water monitoring system he must:

(1) Within one year after the effective date of these regulations, submit to the Regional Administrator a specific plan, certified by a qualified geologist or geotechnical engineer, which satisfies the requirements of § 265.93(d)(3), for an alternate ground-water monitoring system;

(2) Not later than one year after the effective date of these regulations, initiate the determinations specified in § 265.93(d)(4);

(3) Prepare and submit a written report in accordance with § 265.93(d)(5);

(4) Continue to make the determinations specified in § 265.93(d)(4) on a quarterly basis until final closure of the facility; and

(5) Comply with the recordkeeping and reporting requirements in § 265.94(b).

§ 265.91 Ground-water monitoring system.

(a) A ground-water monitoring system must be capable of yielding ground-water samples for analysis and must consist of:

(1) Monitoring wells (at least one) installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the waste management area. Their number, locations, and depths must be sufficient to yield ground-water samples that are:

(i) Representative of background ground-water quality in the uppermost aquifer near the facility; and

(ii) Not affected by the facility; and
(2) Monitoring wells (at least three) installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the waste management area. Their number, locations, and depths must ensure that they immediately detect any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer.

(b) Separate monitoring systems for each waste management component of a facility are not required provided that provisions for sampling upgradient and downgradient water quality will detect any discharge from the waste management area.

(1) In the case of a facility consisting of only one surface impoundment, landfill, or land treatment area, the waste management area is described by the waste boundary (perimeter).

(2) In the case of a facility consisting of more than one surface impoundment, landfill, or land treatment area, the waste management area is described by an imaginary boundary line which

circumscribes the several waste management components.

(c) All monitoring wells must be cased in a manner that maintains the integrity of the monitoring well bore hole. This casing must be screened or perforated, and packed with gravel or sand where necessary, to enable sample collection at depths where appropriate aquifer flow zones exist. The annular space (i.e., the space between the bore hole and well casing) above the sampling depth must be sealed with a suitable material (e.g., cement grout or bentonite slurry) to prevent contamination of samples and the ground water.

§ 265.92 Sampling and analysis.

(a) The owner or operator must obtain and analyze samples from the installed ground-water monitoring system. The owner or operator must develop and follow a ground-water sampling and analysis plan. He must keep this plan at the facility. The plan must include procedures and techniques for:

- (1) Sample collection;
- (2) Sample preservation and shipment;
- (3) Analytical procedures; and
- (4) Chain of custody control.

[Comment: See "Procedures Manual For Ground-water Monitoring At Solid Waste Disposal Facilities," EPA-530/SW-611, August 1977 and "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, March 1979 for discussions of sampling and analysis procedures.]

(b) The owner or operator must determine the concentration or value of the following parameters in ground-water samples in accordance with paragraphs (c) and (d) of this section:

(1) Parameters characterizing the suitability of the ground water as a drinking water supply, as specified in Appendix III.

(2) Parameters establishing ground-water quality:

- (i) Chloride
- (ii) Iron
- (iii) Manganese
- (iv) Phenols
- (v) Sodium
- (vi) Sulfate

[Comment: These parameters are to be used as a basis for comparison in the event a ground-water quality assessment is required under § 265.93(d).]

(3) Parameters used as indicators of ground-water contamination:

- (i) pH
- (ii) Specific Conductance
- (iii) Total Organic Carbon
- (iv) Total Organic Halogen

(c)(1) For all monitoring wells, the owner or operator must establish initial

background concentrations or values of all parameters specified in paragraph (b) of this Section. He must do this quarterly for one year.

(2) For each of the indicator parameters specified in paragraph (b)(3) of this Section, at least four replicate measurements must be obtained for each sample and the initial background arithmetic mean and variance must be determined by pooling the replicate measurements for the respective parameter concentrations or values in samples obtained from upgradient wells during the first year.

(d) After the first year, all monitoring wells must be sampled and the samples analyzed with the following frequencies:

(1) Samples collected to establish ground-water quality must be obtained and analyzed for the parameters specified in paragraph (b)(2) of this Section at least annually.

(2) Samples collected to indicate ground-water contamination must be obtained and analyzed for the parameters specified in paragraph (b)(3) of this Section at least semi-annually.

(e) Elevation of the ground-water surface at each monitoring well must be determined each time a sample is obtained.

§ 265.93 Preparation, evaluation, and response.

(a) Within one year after the effective date of these regulations, the owner or operator must prepare an *outline* of a ground-water quality assessment program. The outline must describe a more comprehensive ground-water monitoring program (than that described in §§ 265.91 and 265.92) capable of determining:

(1) Whether hazardous waste or hazardous waste constituents have entered the ground water;

(2) The rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water; and

(3) The concentrations of hazardous waste or hazardous waste constituents in the ground water.

(b) For each indicator parameter specified in § 265.92(b)(3), the owner or operator must calculate the arithmetic mean and variance, based on at least four replicate measurements on each sample, for each well monitored in accordance with § 265.92(d)(2), and compare these results with its initial background arithmetic mean. The comparison must consider individually each of the wells in the monitoring system, and must use the Student's *t*-test at the 0.01 level of significance (see Appendix IV) to determine statistically significant increases (and decreases, in the case of pH) over initial background.

(c)(1) If the comparisons for the *upgradient* wells made under paragraph (b) of this Section show a significant increase (or pH decrease), the owner or operator must submit this information in accordance with § 265.94(a)(2)(ii).

(2) If the comparisons for *downgradient* wells made under paragraph (b) of this Section show a significant increase (or pH decrease), the owner or operator must then immediately obtain additional ground-water samples from those downgradient wells where a significant difference was detected, split the samples in two, and obtain analyses of all additional samples to determine whether the significant difference was a result of laboratory error.

(d)(1) If the analyses performed under paragraph (c)(2) of this Section confirm the significant increase (or pH decrease), the owner or operator must provide written notice to the Regional Administrator—within seven days of the date of such confirmation—that the facility may be affecting ground-water quality.

(2) Within 15 days after the notification under paragraph (d)(1) of this Section, the owner or operator must develop and submit to the Regional Administrator a specific plan, based on the outline required under paragraph (a) of this Section and certified by a qualified geologist or geotechnical engineer, for a ground-water quality assessment program at the facility.

(3) The plan to be submitted under § 265.90(d)(1) or paragraph (d)(2) of this Section must specify:

(i) The number, location, and depth of wells;

(ii) Sampling and analytical methods for those hazardous wastes or hazardous waste constituents in the facility;

(iii) Evaluation procedures, including any use of previously-gathered ground-water quality information; and

(iv) A schedule of implementation.

(4) The owner or operator must implement the ground-water quality assessment plan which satisfies the requirements of paragraph (d)(3) of this Section, and, at a minimum, determine:

(i) The rate and extent of migration of the hazardous waste or hazardous waste constituents in the ground water; and

(ii) The concentrations of the hazardous waste or hazardous waste constituents in the ground water.

(5) The owner or operator must make his first determination under paragraph (d)(4) of this Section as soon as technically feasible, and, within 15 days after that determination, submit to the Regional Administrator a written report

containing an assessment of the ground-water quality.

(6) If the owners or operator determines, based on the results of the first determination under paragraph (d)(4) of this Section, that no hazardous waste or hazardous waste constituents from the facility have entered the ground water, then he may reinstate the indicator evaluation program described in § 265.92 and paragraph (b) of this Section. If the owner or operator reinstates the indicator evaluation program, he must so notify the Regional Administrator in the report submitted under paragraph (d)(5) of this Section.

(7) If the owner or operator determines, based on the first determination under paragraph (d)(4) of this Section, that hazardous waste or hazardous waste constituents from the facility have entered the ground water, then he:

(i) Must continue to make the determinations required under paragraph (d)(4) of this Section on a quarterly basis until final closure of the facility, if the ground-water quality assessment plan was implemented prior to final closure of the facility; or

(ii) May cease to make the determinations required under paragraph (d)(4) of this Section, if the ground-water quality assessment plan was implemented during the post-closure care period.

(e) Notwithstanding any other provision of this Subpart, any ground-water quality assessment to satisfy the requirements of § 265.93(d)(4) which is initiated prior to final closure of the facility must be completed and reported in accordance with § 265.93(d)(5).

(f) Unless the ground water is monitored to satisfy the requirements of § 265.93(d)(4), at least annually the owner or operator must evaluate the data on ground-water surface elevations obtained under § 265.92(e) to determine whether the requirements under § 265.91(a) for locating the monitoring wells continues to be satisfied. If the evaluation shows that § 265.91(a) is no longer satisfied, the owner or operator must immediately modify the number, location, or depth of the monitoring wells to bring the ground-water monitoring system into compliance with this requirement.

§ 265.94 Recordkeeping and reporting.

(a) Unless the ground water is monitored to satisfy the requirements of § 265.93(d)(4), the owner or operator must:

(1) Keep records of the analyses required in § 265.92(c) and (d), the associated ground-water surface elevations required in § 265.92(e), and

the evaluations required in § 265.93(b) throughout the active life of the facility, and, for disposal facilities, throughout the post-closure care period as well; and

(2) Report the following ground-water monitoring information to the Regional Administrator:

(i) During the first year when initial background concentrations are being established for the facility: concentrations or values of the parameters listed in § 265.92(b)(1) for each ground-water monitoring well within 15 days after completing each quarterly analysis. The owner or operator must separately identify for each monitoring well any parameters whose concentration or value has been found to exceed the maximum contaminant levels listed in Appendix III.

(ii) Annually: concentrations or values of the parameters listed in § 265.92(b)(3) for each ground-water monitoring well, along with the required evaluations for these parameters under § 265.93(b). The owner or operator must separately identify any significant differences from initial background found in the upgradient wells, in accordance with § 265.93(c)(1). During the active life of the facility, this information must be submitted as part of the annual report required under § 265.75.

(iii) As a part of the annual report required under § 265.75: results of the evaluation of ground-water surface elevations under § 265.93(f), and a description of the response to that evaluation, where applicable.

(b) If the ground water is monitored to satisfy the requirements of § 265.93(d)(4), the owner or operator must:

(1) Keep records of the analyses and evaluations specified in the plan, which satisfies the requirements of § 265.93(d)(3), throughout the active life of the facility, and, for disposal facilities, throughout the post-closure care period as well; and

(2) Annually, until final closure of the facility, submit to the Regional Administrator a report containing the results of his ground-water quality assessment program which includes, but is not limited to, the calculated (or measured) rate of migration of hazardous waste or hazardous waste constituents in the ground water during the reporting period. This report must be submitted as part of the annual report required under § 265.75.

§§ 265.95-265.109 [Reserved]

Subpart G—Closure and Post-Closure

§ 265.110 Applicability.

Except as § 265.1 provides otherwise:

(a) Sections 265.111-265.115 (which concern closure) apply to the owners and operators of all hazardous waste facilities; and

(b) Sections 265.117-265.120 (which concern post-closure care) apply to the owners and operators of all disposal facilities.

§ 265.111 Closure performance standard.

The owner or operator must close his facility in a manner that: (a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground water, or surface waters, or to the atmosphere.

§ 265.112 Closure plan; amendment of plan.

(a) On the effective date of these regulations, the owner or operator must have a written closure plan. He must keep this plan at the facility. This plan must identify the steps necessary to completely close the facility at any point during its intended life and at the end of its intended life. The closure plan must include, at least:

(1) A description of how and when the facility will be partially closed, if applicable, and ultimately closed. The description must identify the maximum extent of the operation which will be be unclosed during the life of the facility, and how the requirements of § 265.111 and the applicable closure requirements of §§ 265.197, 265.228, 265.280, 265.310, 265.351, 265.381, and 265.404 will be met;

(2) An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility;

(3) A description of the steps needed to decontaminate facility equipment during closure; and

(4) A schedule for final closure which must include, as a minimum, the anticipated date when wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. (For example, the expected date for completing treatment or disposal of waste inventory must be included, as must the planned date for removing any residual wastes from

storage facilities and treatment processes.)

(b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator must amend his plan any time changes in operating plans or facility design affect the closure plan.

(c) The owner or operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. The Regional Administrator will modify, approve, or disapprove the plan within 90 days of receipt and after providing the owner or operator and the affected public (through a newspaper notice) the opportunity to submit written comments. If an owner or operator plans to begin closure within 180 days after the effective date of these regulations, he must submit the necessary plans on the effective date of these regulations.

§ 265.113 Time allowed for closure.

(a) Within 90 days after receiving the final volume of hazardous wastes, the owner or operator must treat all hazardous wastes in storage or in treatment, or remove them from the site, or dispose of them on-site, in accordance with the approved closure plan.

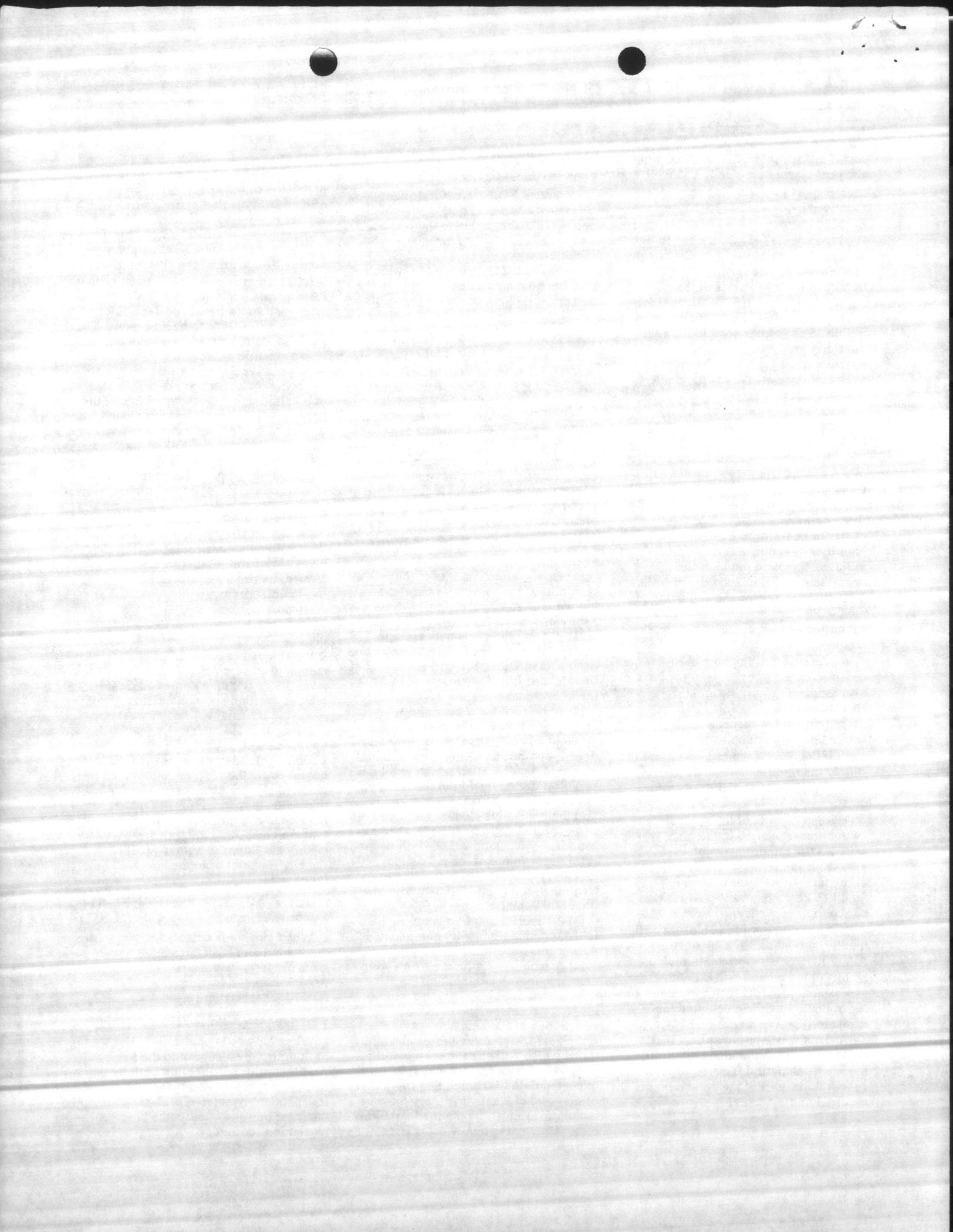
(b) The owner or operator must complete closure activities in accordance with the approved closure plan and within six months after receiving the final volume of wastes. The Regional Administrator may approve a longer closure period under § 265.112(c) if the owner or operator can demonstrate that: (1) the required or planned closure activities will, of necessity, take him longer than six months to complete, and (2) that he has taken all steps to eliminate any significant threat to human health and the environment from the unclosed but inactive facility.

§ 265.114 Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

§ 265.115 Certification of closure.

When closure is completed, the owner or operator must submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the



Part 261, Appendix [Amended]

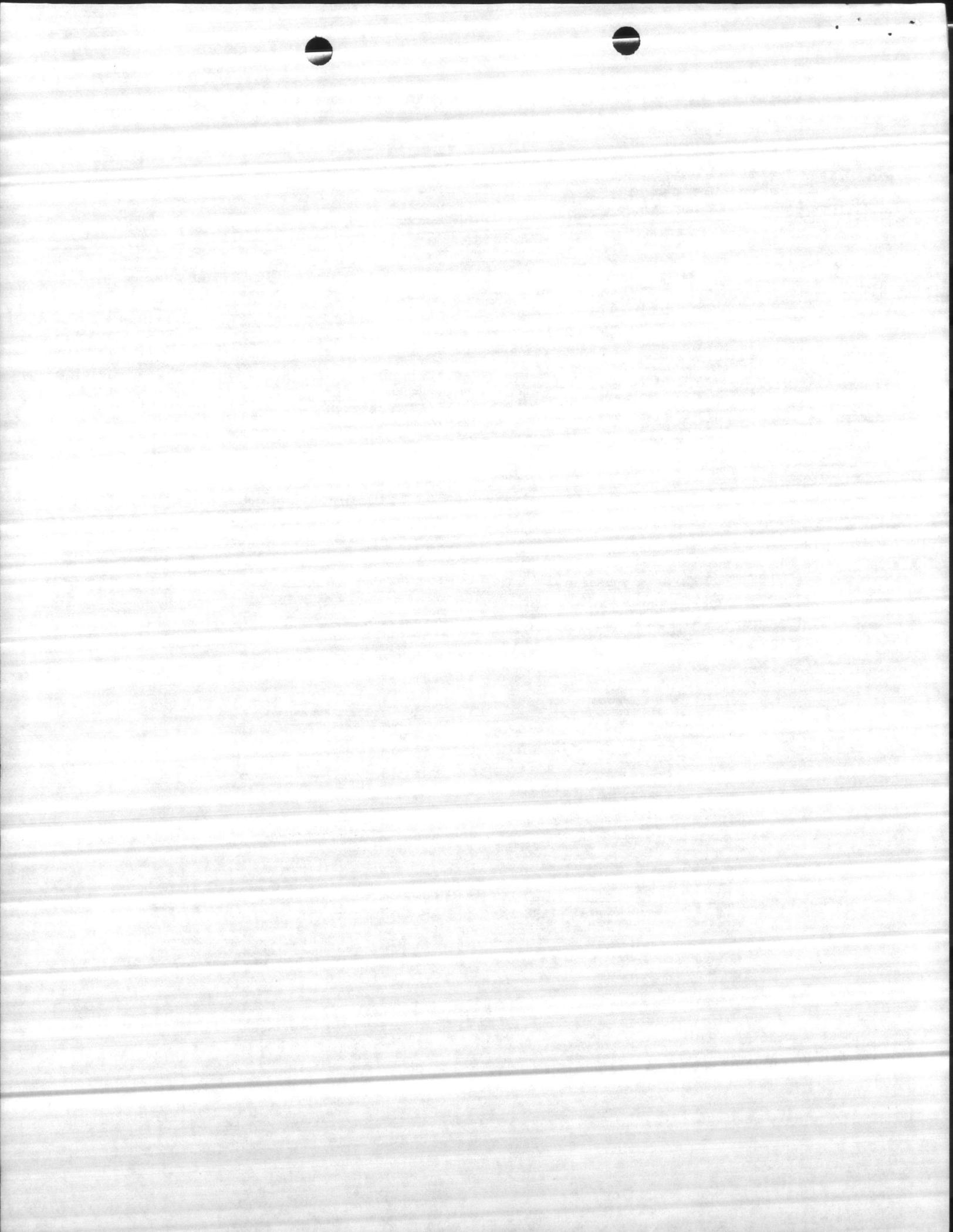
4. Revise Appendix VII to Part 261 to read as follows:

Appendix VII—Basis for Listing Hazardous Wastes

EPA hazardous waste No.	Hazardous constituents for which listed	EPA hazardous waste No.	Hazardous constituents for which listed
F001	Tetrachloroethylene, methylene chloride trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chlorinated fluorocarbons.	K004	Hexavalent chromium.
F002	Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane.	K005	Hexavalent chromium, lead.
F003	N.A.	K006	Hexavalent chromium.
F004	Cresols and creylic acid, nitrobenzene.	K007	Cyanide (complexed), hexavalent chromium.
F005	Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine.	K008	Hexavalent chromium.
F006	Cadmium, hexavalent chromium, nickel, cyanide (complexed).	K009	Chloroform, formaldehyde, methylene chloride, methyl chloride, paraaldehyde, formic acid.
F007	Cyanide (salts).	K010	Chloroform, formaldehyde, methylene chloride, methyl chloride, paraaldehyde, formic acid, chloroacetaldehyde.
F008	Cyanide (salts).	K011	Acrylonitrile, acetonitrile, hydrocyanic acid.
F009	Cyanide (salts).	K012	Hydrocyanic acid, acrylonitrile, acetonitrile.
F010	Cyanide (salts).	K013	Acetonitrile, acrylamide.
F011	Cyanide (salts).	K014	Benzy chloride, chlorobenzene, toluene, benzotrithloride.
F012	Cyanide (complexed).	K015	Hexachlorobenzene, hexachlorobutadiene, carbon tetrachloride, hexachloroethane, perchloroethylene.
F014	Cyanide (complexed).	K016	Hexachlorobenzene, hexachlorobutadiene, carbon tetrachloride, hexachloroethane, perchloroethylene.
F015	Cyanide (salts).	K017	Epichlorohydrin, chloroethers [bis(chloromethyl) ether and bis (2-chloroethyl) ethers], trichloropropane, dichloropropanols.
F019	Hexavalent chromium, cyanide (complexed).	K018	1,2-dichloroethane, trichloroethylene, hexachlorobutadiene, hexachlorobenzene.
K001	Pentachlorophenol, phenol, 2-chlorophenol, p-chloro-m-cresol, 2,4-dimethylphenyl, 2,4-dinitrophenol, trichlorophenols, tetrachlorophenols, 2,4-dinitrophenol, cresols, chrysene, naphthalene, fluoranthene, benzo(b)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)pyrene, benz(a)anthracene, dibenz(a)anthracene, acenaphthalene.	K019	Ethylene dichloride, 1,1,1-trichloroethane, 1,1,2-trichloroethane, tetrachloroethanes (1,1,2,2-tetrachloroethane and 1,1,1,2-tetrachloroethane), trichloroethylene, tetrachloroethylene, carbon tetrachloride, chloroform, vinyl chloride, vinylidene chloride.
K002	Hexavalent chromium, lead.	K020	Ethylene dichloride, 1,1,1-trichloroethane, 1,1,2-trichloroethane, tetrachloroethanes (1,1,2,2-tetrachloroethane and 1,1,1,2-tetrachloroethane), trichloroethylene, tetrachloroethylene, carbon tetrachloride, chloroform, vinyl chloride, vinylidene chloride.
K003	Hexavalent chromium, lead.	K021	Antimony, carbon tetrachloride, chloroform.
K066	Lead, hexavalent chromium.	K022	Phenol, tars (polycyclic aromatic hydrocarbons).
K067	Phenol, asphaltene.	K023	Phthalic anhydride, maleic anhydride.
K093	Phthalic anhydride, maleic anhydride.	K024	Phthalic anhydride, 1,4-naphthoquinone.
K094	Phthalic anhydride.	K025	Meta-dinitrobenzene, 2,4-dinitrotoluene.
K095	1,1,2-trichloroethane, 1,1,1,2-tetrachloroethane, 1,1,2,2-tetrachloroethane.	K026	Paraaldehyde, pyridines, 2-picoline.
K096	1,2-dichloroethane, 1,1,1-trichloroethane, 1,1,2-trichloroethane.	K027	Toluene diisocyanate, toluene-2,4-diamine.
K097	Chlordane, heptachlor.	K028	1,1,1-trichloroethane, vinyl chloride.
K098	Toxaphene.	K029	1,2-dichloroethane, 1,1,1-trichloroethane, vinyl chloride, vinylidene chloride, chloroform.
K099	2,4-dichlorophenol, 2,4,6-trichlorophenol.	K030	Hexachlorobenzene, hexachlorobutadiene, hexachloroethane, 1,1,1,2-tetrachloroethane, 1,1,2,2-tetrachloroethane, ethylene dichloride.
K100	Hexavalent chromium, lead, cadmium.	K031	Arsenic.
K101	Arsenic.	K032	Hexachlorocyclopentadiene.
K102	Arsenic.	K033	Hexachlorocyclopentadiene.
K103	Aniline, nitrobenzene, phenylenediamine.	K034	Hexachlorocyclopentadiene.
K104	Aniline, benzene, diphenylamine, nitrobenzene, phenylenediamine.	K035	Cresols, chrysene, asphaltene, fluoranthene, benzo(b)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)pyrene, benzo(a)anthracene, dibenz(a)anthracene, acenaphthalene.
K105	Benzene, monochlorobenzene, dichlorobenzene, 2,4,6-trichlorophenol.	K036	Toluene, phosphorothioic and phosphoro-thioic acid esters.
K106	Mercury.	K037	Toluene, phosphorothioic and phosphoro-thioic acid esters.
		K038	Phorates, formaldehyde, phosphorothioic and phosphoro-thioic acid esters.
		K039	Phosphorothioic and phosphoro-thioic acid esters.
		K040	Phorates, formaldehyde, phosphorothioic and phosphoro-thioic acid esters.
		K041	Toxaphene.
		K042	Hexachlorobenzene, ortho-dichlorobenzene.
		K043	2,4-dichlorophenol, 2,6-dichlorophenol, 2,4,6-trichlorophenol.
		K044	N.A.
		K045	N.A.
		K046	Lead.
		K047	N.A.
		K048	Hexavalent chromium, lead.
		K049	Hexavalent chromium, lead.
		K050	Hexavalent chromium.
		K051	Hexavalent chromium, lead.
		K052	Lead.
		K060	Cyanide, naphthalene, phenolic compounds, arsenic.
		K061	Hexavalent chromium, lead, cadmium.
		K062	Hexavalent chromium, lead.
		K064	Lead, cadmium.
		K065	Lead, cadmium.
		K066	Lead, cadmium.
		K067	Lead, cadmium.
		K068	Lead, cadmium.
		K069	Hexavalent chromium, lead, cadmium.
		K071	Mercury.
		K072	Chloroform, carbon tetrachloride, hexachloroethane, trichloroethane, tetrachloroethylene, dichloroethylene, 1,1,2,2-tetrachloroethane.
		K083	Aniline, diphenylamine, nitrobenzene, phenylenediamine.
		K084	Arsenic.
		K085	Benzene, dichlorobenzene, trichlorobenzene, tetrachlorobenzene, pentachlorobenzene, hexachlorobenzene, benzyl chloride.

N.A.—Waste is hazardous because it fails the test for the characteristic of ignitability, corrosivity, or reactivity.

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BILLING CODE 6560-30-68



- Aldrin
 Allyl alcohol
 Aluminum phosphide
 4-Aminobiphenyl
 6-Amino-1,1a,2,8,8a,8b-hexahydro-8-(hydroxymethyl)-8a-methoxy-5-methylcarbamate azirino(2',3':3,4)pyrrolo(1,2-a)indole-4,7-dione (ester) (Mitomycin C)
 5-(Aminomethyl)-3-isoxazolol
 4-Aminopyridine
 Amitrole
 Antimony and compounds, N.O.S.¹
 Aramite
 Arsenic and compounds, N.O.S.
 Arsenic acid
 Arsenic pentoxide
 Arsenic trioxide
 Auramine
 Azaserine
 Barium and compounds, N.O.S.
 Barium cyanide
 Benz[c]acridine
 Benz[a]anthracene
 Benzene
 Benzenearsonic acid
 Benzenethiol
 Benzidine
 Benzo[a]anthracene
 Benzo[b]fluoranthene
 Benzo[j]fluoranthene
 Benzo[a]pyrene
 Benzotrichloride
 Benzyl chloride
 Beryllium and compounds, N.O.S.
 Bis(2-chloroethoxy)methane
 Bis(2-chloroethyl) ether
 N,N-Bis(2-chloroethyl)-2-naphthylamine
 Bis(2-chloroisopropyl) ether
 Bis(chloromethyl) ether
 Bis(2-ethylhexyl) phthalate
 Bromoacetone
 Bromomethane
 4-Bromophenyl phenyl ether
 Brucine
 2-Butanone peroxide
 Butyl benzyl phthalate
 2-sec-Butyl-4,6-dinitrophenol (DNBP)
 Cadmium and compounds, N.O.S.
 Calcium chromate
 Calcium cyanide
 Carbon disulfide
 Chlorambucil
 Chlordane (alpha and gamma isomers)
 Chlorinated benzenes, N.O.S.
 Chlorinated ethane, N.O.S.
 Chlorinated naphthalene, N.O.S.
 Chlorinated phenol, N.O.S.
 Chloroacetaldehyde
 Chloroalkyl ethers
 p-Chloroaniline
 Chlorobenzene
 Chlorobenzilate
 1-(p-Chlorobenzoyl)-5-methoxy-2-methylindole-3-acetic acid
 p-Chloro-m-cresol
 1-Chloro-2,3-epoxybutane
 2-Chloroethyl vinyl ether
 Chloroform
 Chloromethane
 Chloromethyl methyl ether
 2-Chloronaphthalene
 2-Chlorophenol
 1-(o-Chlorophenyl)thiourea
 3-Chloropropionitrile
 alpha-Chlorotoluene
 Chlorotoluene, N.O.S.
 Chromium and compounds, N.O.S.
 Chrysene
 Citrus red No. 2
 Copper cyanide
 Creosote
 Crotonaldehyde
 Cyanides (soluble salts and complexes), N.O.S.
 Cyanogen
 Cyanogen bromide
 Cyanogen chloride
 Cycasin
 2-Cyclohexyl-4,6-dinitrophenol
 Cyclophosphamide
 Daunomycin
 DDD
 DDE
 DDT
 Diallate
 Dibenz[a,h]acridine
 Dibenz[a,j]acridine
 Dibenz[a,h]anthracene (Dibenzo[a,h]anthracene)
 7H-Dibenzo[c,g]carbazole
 Dibenzo[a,e]pyrene
 Dibenzo[a,h]pyrene
 Dibenzo[a,i]pyrene
 1,2-Dibromo-3-chloropropane
 1,2-Dibromoethane
 Dibromomethane
 Di-n-butyl phthalate
 Dichlorobenzene, N.O.S.
 3,3'-Dichlorobenzidine
 1,1-Dichloroethane
 1,2-Dichloroethane
 trans-1,2-Dichloroethane
 Dichloroethylene, N.O.S.
 1,1-Dichloroethylene
 Dichloromethane
 2,4-Dichlorophenol
 2,6-Dichlorophenol
 2,4-Dichlorophenoxyacetic acid (2,4-D)
 Dichloropropane
 Dichlorophenylarsine
 1,2-Dichloropropane
 Dichloropropanol, N.O.S.
 Dichloropropene, N.O.S.
 1,3-Dichloropropene
 Dieldrin
 Diepoxybutane
 Diethylarsine
 0,0-Diethyl-S-(2-ethylthio)ethyl ester of phosphorothioic acid
 1,2-Diethylhydrazine
 0,0-Diethyl-S-methylester phosphorodithioic acid
 0,0-Diethylphosphoric acid, O-p-nitrophenyl ester
 Diethyl phthalate
 0,0-Diethyl-O-(2-pyrazinyl)phosphorothioate
 Diethylstilbestrol
 Dihydroxofrole
 3,4-Dihydroxy-alpha-(methylamino)-methyl benzyl alcohol
 Di-isopropylfluorophosphate (DFP)
 Dimethoate
 3,3'-Dimethoxybenzidine
 p-Dimethylaminoazobenzene
 7,12-Dimethylbenz[a]anthracene
 3,3'-Dimethylbenzidine
 Dimethylcarbamoyl chloride

N.A.—Waste is hazardous because it meets either the ignitability, corrosivity or reactivity characteristic.

Appendix VIII—Hazardous Constituents

- Acetaldehyde
 (Acetato)phenylmercury
 Acetonitrile
 3-(alpha-Acetylbenzyl)-4-hydroxycoumarin and salts
 2-Acetylaminofluorene
 Acetyl chloride
 1-Acetyl-2-thiourea
 Acrolein
 Acrylamide
 Acrylonitrile
 Aflatoxins

¹ The abbreviation N.O.S. signifies those members of the general class "not otherwise specified" by name in this listing.

- 1.1-Dimethylhydrazine
 1.2-Dimethylhydrazine
 3.3-Dimethyl-1-(methylthio)-2-butanone-0-((methylamino) carbonyl)oxime
 Dimethylnitrosoamine
 alpha, alpha-Dimethylphenethylamine
 2.4-Dimethylphenol
 Dimethyl phthalate
 Dimethyl sulfate
 Dinitrobenzene, N.O.S.
 4,6-Dinitro-o-cresol and salts
 2,4-Dinitrophenol
 2,4-Dinitrotoluene
 2,6-Dinitrotoluene Di-n-octyl phthalate
 1.4-Dioxane
 1.2-Diphenylhydrazine
 Di-n-propylnitrosamine
 Disulfoton
 2,4-Dithiobiuret
 Endosulfan
 Endrin and metabolites
 Epichlorohydrin
 Ethyl cyanide
 Ethylene diamine
 Ethylenebisdithiocarbamate (EBDC)
 Ethyleneimine
 Ethylene oxide
 Ethylenethiourea
 Ethyl methanesulfonate
 Fluoranthene
 Fluorine
 2-Fluoroacetamide
 Fluoroacetic acid, sodium salt
 Formaldehyde
 Glycidylaldehyde
 Halomethane, N.O.S.
 Heptachlor
 Heptachlor epoxide (alpha, beta, and gamma isomers)
 Hexachlorobenzene
 Hexachlorobutadiene
 Hexachlorocyclohexane (all isomers)
 Hexachlorocyclopentadiene
 Hexachloroethane
 1.2.3.4.10.10-Hexachloro-1.4.4a.5.8.8a-hexahydro-1,4:5,8-endo,endo-dimethanonaphthalene
 Hexachlorophene
 Hexachloropropene
 Hexaethyl tetraphosphate
 Hydrazine
 Hydrocyanic acid
 Hydrogen sulfide
 Indeno(1,2,3-c,d)pyrene
 Iodomethane
 Isocyanic acid, methyl ester
 Isosafrole
 Kepone
 Lasiocarpine
 Lead and compounds, N.O.S.
 Lead acetate
 Lead phosphate
 Lead subacetate
 Maleic anhydride
 Malononitrile
 Melphalan
 Mercury and compounds, N.O.S.
 Methapyrilene
 Methomyl
 2-Methylaziridine
 3-Methylcholanthrene
 4,4'-Methylene-bis-(2-chloroaniline)
 Methyl ethyl ketone (MEK)
 Methyl hydrazine
 2-Methylactonitrile
 Methyl methacrylate
 Methyl methanesulfonate
 2-Methyl-2-(methylthio)propionaldehyde-o-(methylcarbonyl) oxime
 N-Methyl-N'-nitro-N-nitrosoguanidine
 Methyl parathion
 Methylthiouracil
 Mustard gas
 Naphthalene
 1,4-Naphthoquinone
 1-Naphthylamine
 2-Naphthylamine
 1-Naphthyl-2-thiourea
 Nickel and compounds, N.O.S.
 Nickel carbonyl
 Nickel cyanide
 Nicotine and salts
 Nitric oxide
 p-Nitroaniline
 Nitrobenzene
 Nitrogen dioxide
 Nitrogen mustard and hydrochloride salt
 Nitrogen mustard N-oxide and hydrochloride salt
 Nitrogen peroxide
 Nitrogen tetroxide
 Nitroglycerin
 4-Nitrophenol
 4-Nitroquinoline-1-oxide
 Nitrosamine, N.O.S.
 N-Nitrosodi-N-butylamine
 N-Nitrosodiethanolamine
 N-Nitrosodiethylamine
 N-Nitrosodimethylamine
 N-Nitrosodiphenylamine
 N-Nitrosodi-N-propylamine
 N-Nitroso-N-ethylurea
 N-Nitrosomethylethylamine
 N-Nitroso-N-methylurea
 N-Nitroso-N-methylurethane
 N-Nitrosomethylvinylamine
 N-Nitrosomorpholine
 N-Nitrosomornicotine
 N-Nitrosopiperidine
 N-Nitrosopyrrolidine
 N-Nitrososarcosine
 5-Nitro-o-toluidine
 Octamethylpyrophosphoramide
 Oleyl alcohol condensed with 2 moles ethylene oxide
 Osmium tetroxide
 7-Oxabicyclo[2.2.1]heptane-2,3-dicarboxylic acid
 Parathion
 Pentachlorobenzene
 Pentachloroethane
 Pentachloronitrobenzene (PCNB)
 Pentachlorophenol
 Phenacetin
 Phenol
 Phenyl dichloroarsine
 Phenylmercury acetate
 N-Phenylthiourea
 Phosgene
 Phosphine
 Phosphorothioic acid, O,O-dimethyl ester, O-ester with N,N-dimethyl benzene sulfonamide
 Phthalic acid esters, N.O.S.
 Phthalic anhydride
 Polychlorinated biphenyl, N.O.S.
 Potassium cyanide
 Potassium silver cyanide
 Pronamide
 1,2-Propanediol
 1,3-Propane sulfone
 Propionitrile
 Propylthiouracil
 2-Propyn-1-ol
 Pridine
 Reserpine
 Saccharin
 Safrole
 Selenious acid
 Selenium and compounds, N.O.S.
 Selenium sulfide
 Selenourea
 Silver and compounds, N.O.S.
 Silver cyanide
 Sodium cyanide
 Streptozotocin
 Strontium sulfide
 Strychnine and salts
 1,2,4,5-Tetrachlorobenzene
 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)
 Tetrachloroethane, N.O.S.
 1,1,1,2-Tetrachloroethane
 1,1,2,2-Tetrachloroethane
 Tetrachloroethene (Tetrachloroethylene)
 Tetrachloromethane
 2,3,4,6-Tetrachlorophenol
 Tetraethylthiopyrophosphate
 Tetraethyl lead
 Tetraethylpyrophosphate
 Thallium and compounds, N.O.S.
 Thallous oxide
 Thallium (I) acetate
 Thallium (I) carbonate
 Thallium (I) chloride
 Thallium (I) nitrate
 Thallium selenite
 Thallium (I) sulfate
 Thioacetamide
 Thiosemicarbazide
 Thiourea
 Thiuram
 Toluene
 Toluene diamine
 o-Toluidine hydrochloride
 Toluene diisocyanate
 Toxaphene
 Tribromomethane
 1,2,4-Trichlorobenzene
 1,1,1-Trichloroethane
 1,1,2-Trichloroethane
 Trichloroethene (Trichloroethylene)
 Trichloromethanethiol
 2,4,5-Trichlorophenol
 2,4,6-Trichlorophenol
 2,4,5-Trichlorophenoxyacetic acid (2,4,5-T)
 2,4,5-Trichlorophenoxypropionic acid (2,4,5-TP) (Silvex)
 Trichloropropane, N.O.S.
 1,2,3-Trichloropropane
 0,0,0-Triethyl phosphorothioate
 Trinitrobenzene
 Tris(1-aziridinyl)phosphine sulfide
 Tris(2,3-dibromopropyl) phosphate
 Trypan blue
 Uracil mustard
 Urethane
 Vanadic acid, ammonium salt
 Vanadium pentoxide (dust)
 Vinyl chloride
 Vinylidene chloride
 Zinc cyanide
 Zinc phosphide

CHAPTER 3--GROUND-WATER ASSESSMENT PLANS

Part 265, Subpart F, §265.93

1.0 INTRODUCTION

Within one year of the effective date of the Interim Status Standards (i.e., by November 18, 1981), owners or operators of a surface impoundment, landfill or land treatment facility must prepare an outline for conduct of a ground-water quality assessment program (40 CFR 265.93; see Appendix B). The measures outlined in the assessment program would be carried out if the basic ground-water monitoring program (basic program), also specified in the standards (40 CFR 265.91; 265.92), indicates that the facility may be affecting ground-water quality. The assessment program can be implemented directly when the owner or operator knows or suspects that the facility is a contamination source. The basic program is designed to detect the appearance of contamination while the assessment program pre-supposes a pollution source and is designed to evaluate the chemical nature, extent and rate of movement of such pollution.

The purpose of this document is to illustrate the tasks which would be likely elements of an outline for an assessment program. These tasks include expanded monitor-well installation, more detailed chemical testing, and possibly surface water sampling and analysis. Specific technical procedures needed to accomplish each task (e.g., well construction techniques, methods for calculating contaminant migration rate, etc.) are not presented here because numerous other documents are available which adequately cover hydrogeological field analysis. The most applicable is the upcoming "Permit Writer's Manual" (Technical Permit Writer's Guidance Manual for Ground-

Water Monitoring Systems at Hazardous Waste Treatment, Storage and Disposal Facilities). Technical personnel should be aware of other EPA reports such as the "Procedures Manual for Ground-Water Monitoring at Solid Waste Disposal Facilities" (U.S. EPA, 1977), the ground-water sampling report by Dunlap et al. (1977), and the General Electric TEMPO series on ground-water monitoring (e.g., Everett et al., 1976). The U.S. Geological Survey has conducted a wide range of studies employing techniques appropriate to hazardous waste investigations (e.g., Zohdy et al., 1974; Wood, 1976; Konikow and Bredehoeft, 1978). Professional journals, such as Groundwater (published by the National Water Well Association) and Environmental Science and Technology (published by the American Chemical Society), and current textbooks, such as those by Bouwer (1978) and Freeze and Cherry (1979), are also excellent sources. See Section 4 for complete references.

2.0 GROUND-WATER QUALITY ASSESSMENT PROGRAM COMPONENTS

The principal goals of a ground-water quality assessment program, based on the interim status standards (Section 265.93 (d) (4); Appendix B), are to establish:

- "The rate and extent of migration of the hazardous waste or hazardous waste constituents in the ground-water; and
- The concentrations of the hazardous waste or hazardous waste constituents in the ground-water."

Each of these major issues can be examined in three phases:

- The treatment of the issue within the basic ground-water monitoring program;
- Areas where the basic program is inadequate;
- Examples of a more comprehensive assessment program.

The differences between a basic program and an assessment program are highlighted in Table 1.

Except for the source of contamination, the assessment program would be, in principal, very similar to most routine hydrogeological impact assessments. These studies are fully discussed in the technical literature (see for example, Todd and McNulty, 1974 and Freeze and Cherry, 1979). Whereas the interim status standards define specific components in the basic program, only overall goals are set for the assessment program. This approach allows maximum flexibility for solving contamination issues. The specific components of the assessment program will be selected, therefore, based on the professional judgement of the geologist or hydrogeologist performing each individual site analysis.

TABLE 1

COMPARISONS BETWEEN A BASIC GROUND-WATER MONITORING PROGRAM
AND A GROUND-WATER QUALITY ASSESSMENT PROGRAM

Components of the basic ground-water monitoring program	Limitations of the basic program once contamination is detected	Possible components of a more comprehensive assessment program*
Determine the spread of contamination		
<p>1. install monitoring wells:</p> <ul style="list-style-type: none"> o at least three, "hydraulically downgradient -- at the limit of the waste management area." o at least one, "hydraulically upgradient from the limit of the waste management area." 	<p>1.a acts as a warning system only; inadequate for tracing contaminants downgradient</p> <p>1.b no surface water sampling is required</p>	<p>1.a.1 conduct preliminary screening of trend of contaminated ground-water by:</p> <ul style="list-style-type: none"> o shallow borings; temporary probing of shallow ground-water o electrical resistivity and other geophysical or remote surveys <p>1.a.2 expand monitoring network within the facility boundaries and possibly beyond those boundaries</p> <p>1.a.3 increase number of well nests (locations with multiple level ground-water monitoring points)</p> <p>1.a.4 include sampling of nearby water supplies</p> <p>1.a.5 quantify volumes of ground-water flow using field and/or laboratory tests</p> <p>1.b.1 conduct sampling of local surface waters which receive ground-water discharge</p>
Identify the types of contaminants present		
<p>2. analyze samples for three principal groups:</p> <ul style="list-style-type: none"> o "parameters characterizing the suitability of the ground-water as a drinking water supply" (primary maximum contaminant levels)† o "parameters establishing ground-water quality" (chloride, iron, manganese, phenols, sodium, sulfate) o "parameters used as indicators of ground-water contamination." (pH, specific conductance, total organic carbon, total organic halogen) 	<p>2.a many hazardous waste constituents are not directly identified in the basic program</p> <p>2.b sampling frequency may be insufficient for detecting changes in contaminated ground waters</p>	<p>2.a.1 expand analytical scheme to include elements of the EPA list of Priority Pollutants (Finnigan et al., 1979; Keith and Telliard, 1979), e.g.,</p> <ul style="list-style-type: none"> o 31 purgeable organics o 46 base/neutral extractable organic compounds o 11 acid extractable organic compounds o 26 pesticides/PCB's o 13 metals o cyanide, asbestos, phenols <p>2.a.2 expand analytical scheme to include those hazardous waste constituents not on the EPA list of Priority Pollutants</p> <p>2.a.3 employ advanced analytical techniques for parameter identification/quantification (Finnigan et al., 1979; Keith and Telliard, 1979), e.g.,</p> <ul style="list-style-type: none"> o gas chromatography or gas/liquid chromatography for screening o gas chromatography/mass spectrometry for full spectrum identification and quantification of organic constituents <p>2.b.1 increase sampling frequency based on plume movement, environmental hazard potential and probable timing of pollution abatement measures</p>

*This is a list of some of the major ground-water assessment program components. Not all programs will contain all components; some will include components which are not on this list. The permit-writers manual will contain a more detailed treatment of the technical procedures to be employed in ground-water assessment programs.

†Code of Federal Regulations, Title 40, Part 141

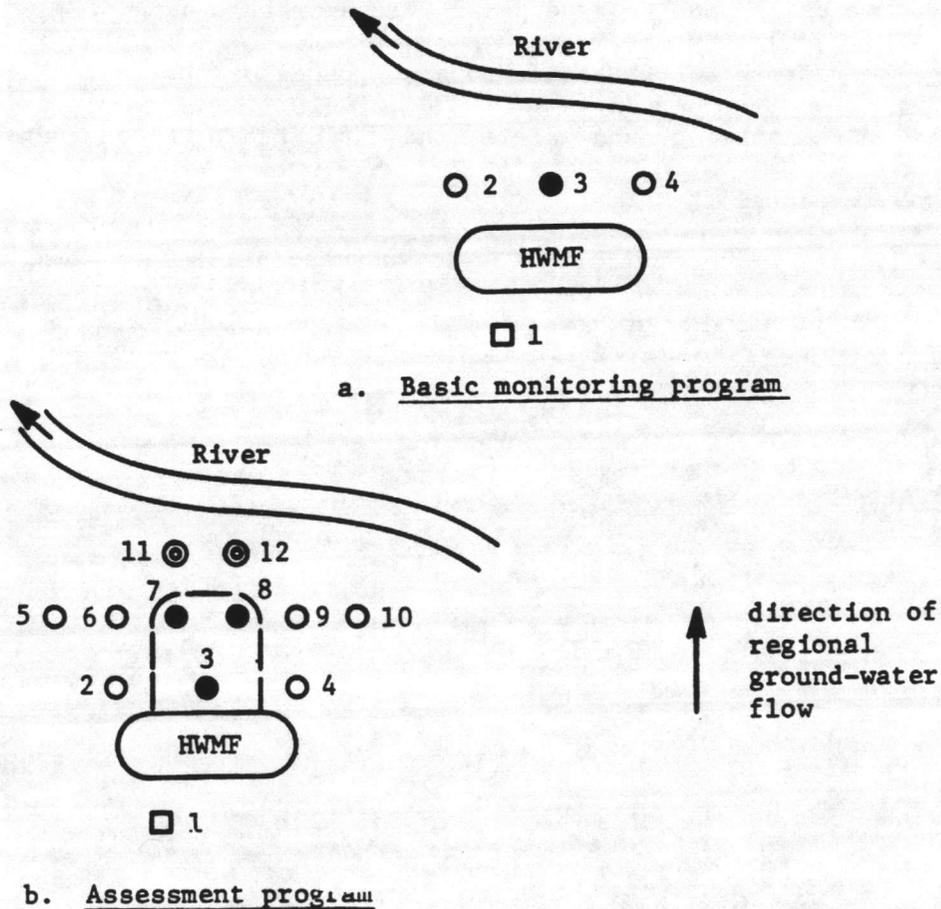
Most of the principal components of a ground-water assessment program are shown in Table 1, though site-specific characteristics may necessitate other technical approaches. Whereas the basic program includes wells at the limit of the waste management area, an assessment program could include a series of wells further downgradient and, possibly, greater numbers of multi-level well "nests." Organic contaminants which are analyzed through gross indicators (e.g., using total organic carbon and total organic halogen tests) in the basic program might be more completely determined for example, through gas chromatography or gas chromatography/mass spectrometry.

3.0 EXAMPLE OF GROUND-WATER ASSESSMENT PROGRAM IMPLEMENTATION

In the hypothetical setting shown in Figure 1, ground-water samples from one downgradient well (number 3) showed a statistically significant increase in organic indicator parameters (total organic carbon and total organic halogen). These results were confirmed by duplicate sampling and testing. To trace the spread of contamination, as the first step in the ground-water quality assessment program, an additional line of downgradient wells was installed (numbers 5 through 10).

Water samples were taken from all new and old wells. A screening for organic constituents was performed using gas chromatography. The work showed that three wells (numbers 3, 7 and 8) contained elevated levels of purgeable (volatile) organics while the others (numbers 1, 2, 4, 5, 6, 9, and 10) were not contaminated. Gas chromatography/mass spectrometry was then used for analysis of samples from the three contaminated wells. Benzene and toluene were identified as the principal pollutants from the wells. Wells number 7 and 8 produced ground-waters of much lower concentrations than the original contaminated well (number 3), suggesting that the edge of the leachate plume was not far from the second line of wells.

To further define the spread of the plume, two additional well sites (numbers 11 and 12) were developed closer to the river. Since the river receives ground-water discharge and the unconsolidated aquifer bordering the river thickens at this point, "nested" wells were drilled. Each



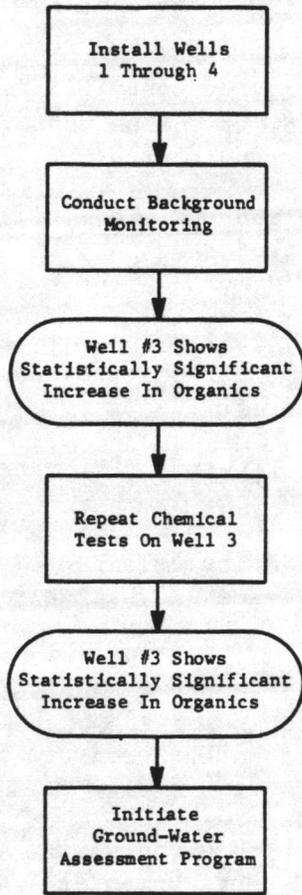
- HWMF hazardous waste management facility
- downgradient well
- upgradient well
- ⊙ "nested" wells (2 wells per site)
- well taps contaminated ground-water
- edge of leachate plume

FIGURE 1
 HYPOTHETICAL MONITOR WELL CONFIGURATIONS
 USED FOR GROUND-WATER CONTAMINATION ANALYSIS

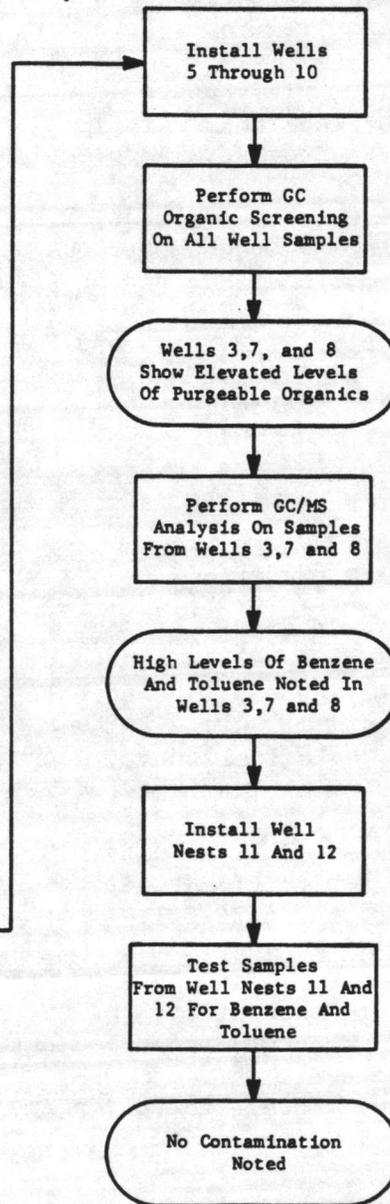
nest contained two wells; one screened near the watertable and one screened at greater depth in the saturated zone. None of the nested wells produced contaminated ground-waters, indicating that the leachate plume had not yet reached the area.

The ground-water assessment program successfully determined the spread of contamination. The decision-making process illustrated in this example is shown schematically in Figure 2.

BASIC GROUND-WATER MONITORING PROGRAM



EXPANDED GROUND-WATER QUALITY ASSESSMENT PROGRAM



- Analytical Step
- Results of Analysis
- GC = gas chromatography
- GC/MS = gas chromatography/mass spectrometry

FIGURE 2
DECISION STEPS IN GROUND-WATER CONTAMINATION ANALYSIS; AN EXAMPLE

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