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USEPA RCRA
3058177

Fast Review — RBT

1. The groundwater monitoring system at the RBT Pit is not in compliance with the 265 groundwater requirements. It can not immediately detect contaminants released into the groundwater from this site.

2. The wells screened in the deeper Trondale are not monitoring wells in any sense. However they do indicate that this site has contaminated groundwater. See page 12 of the Preliminary Groundwater Investigation:

Well #	Cr	PCP
2	—	0.10 mg/l
4	0.08 mg/l	—
So called Background	0.10 mg/l	—

While the background well is also contaminated this may be due to analytical error or a multitude of factors, it is ruled out as a viable control and therefore the study network is inconclusive. An inconclusive network is inadequate

PCP is in well 2, PCP also has been found in the pond on-site.

3. A limited waste assessment revealed ~~revealed~~

Sludge
Cu
Cr
CCAA (arsenic)
Pond water
PCP

It is therefore possible that the contaminants observed in wells 2, 4 and background resulted from activities/releases on this site.

4. In any case there is a strong indication that g.w. contamination is occurring. Immediate detection of releases is not possible given the depth of screens — monitoring should occur in the top of the troutdale.

Key Issue

are administrative not subjectively technical.

* TORT LIABILITY