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## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

### 5. Appendix VIII, Groundwater Monitoring

In the July 24, 1986 Federal Register, EPA proposed changes to the existing ground-water monitoring requirements. These changes involve replacing the requirement for owner/operators to monitor for the 40 CFR 261 Appendix VIII hazardous constituents, with a new list of hazardous constituents in 40 CFR 264 Appendix IX. The Appendix IX list is the same as the Appendix VIII list except it does not include those listings from Appendix VIII that cannot be analyzed for in ground-water. Also, the proposed Appendix IX list includes 25 new constituents that are routinely analyzed for in the Superfund program. Under the existing regulations when the o/o discovers a statistically significant increase of an indicator parameter during the detection monitoring phase, the o/o must immediately sample all ground water monitoring wells and analyze those samples for the presence and concentration of Appendix VIII constituents. Based on this information, the Regional Administrator will set "ground-water protection standards", or levels, for the constituents in the ground water. If these levels are exceeded in the ground water, corrective action must be implemented. If the Appendix IX list is used in place of the Appendix VIII list, will the 25 additional Superfund chemicals also be analyzed for and be subject to the ground-water protection standards of the 40 CFR 264 ground-water monitoring program?

These additional 25 Superfund chemicals would be analyzed for along with the other proposed Appendix IX constituents when a statistically significant increase of an indicator parameter was identified during detection monitoring, and again any time Appendix IX monitoring was required. Because the Agency has not yet evaluated these 25 constituents to be "hazardous" per 47 FR 32295, as they have the Appendix VIII constituents, the Regional Administrator could use the "omnibus authority" of 40 CFR 270.32(b)(2) and Section 3005 (c)(3) of RCRA to set protection standards and require corrective action for these additional 25 constituents if it was deemed necessary to protect human health and the environment.

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