6. Definition of the Term "Joint Site"

The National Contingency Plan (NCP), the regulation governing the Superfund Program, defines "on site" at 40 C.F.R. §300.5 as:

> *"...the areal extent of contamination and all suitable areas in very close proximity to the contamination necessary for implementation of the response action."*

The boundary of a Superfund site occurs at the limits of the areal extent to which contamination has come to be located. Knowledge of this boundary changes as remedial investigations reveal additional areal extent that is contaminated, or as the contamination spreads. It usually is not possible to know with complete certainty all places where contamination has come to be located, even at the conclusion of the remedial investigation, and so in turn the site boundary cannot be known with complete certainty. What is considered the boundary of a site is not static but changes as the knowledge about the extent of contamination changes.

This ROD does not make formal determinations as to the boundaries of the Montrose Chemical Superfund Site nor the Del Amo Superfund Site. Again in accordance with the above definition, each "site" is neither congruent with nor confined by the boundaries of any specific property with which the former Montrose Chemical plant or the former Del Amo plant were associated.

In the case of this remedy, several factors gave rise to the need for EPA to define a term to refer, in concept and by convention, to the area to which the remedy selected by this ROD is assumed to apply:

- As discussed, this ROD is addressing the contamination from the two sites as a single technical problem.

- For convenience and simplicity a shorthand term was needed to encompass the lengthy and awkward reference to groundwater at "the Montrose Chemical and Del Amo Superfund Sites."

- The Montrose and Del Amo Sites lie in an industrial area where other sources of groundwater contamination exist. Some of these other sources will be directly affected by this proposed remedial action, others will not. There needed to be a conceptual (as opposed to absolute) basis for determining how the remedial action selected by this ROD applies to some of these areas and not to others.

- This ROD defines several areas of contaminated groundwater within the Montrose Chemical and Del Amo Superfund sites, to which differing requirements shall apply (e.g. ARAR waivers, containment only, full cleanup, etc.). All such areas occur by definition within the union of the two Superfund sites, and a conceptual basis for this region was needed.

Because of these factors, this ROD does not refer to either site individually unless specifically mentioned. Rather, the ROD uses the term ***Joint Site*** to refer to the area within which the selected remedial action will apply. The area within the Joint Site is based on: 1) the extent of the contamination and 2) the nature and likely effects of the remedial actions selected by this ROD. The latter consideration is included because the remedial action may have a hydraulic influence on certain overlying and surrounding contamination sources that must be considered part of the Joint Site due to their proximity to the remedial action. These hydraulic influences on the sources have been identified with the assistance of the groundwater model (see Section 1.2.3, Section 2, and Appendix B of the Joint Groundwater Feasibility Study (JGWFS), EPA 1988). Specifically, the term "Joint Site" in this ROD refers to:

- The former Montrose Chemical and Del Amo plant properties;

- The areal extent of groundwater affected by the contamination originating or emanating from the former Montrose Chemical and Del Amo plant properties;

- Any areas of groundwater contamination originating or emanating from sources in the vicinity of the former Montrose and Del Amo plant properties that is wholly contained within the areas described in the preceding bullet items;

- Any areas of groundwater contamination that are partially overlapping, or distinct, but in proximity to the areas of groundwater described in the preceding bullet items ***and*** that likely would be significantly affected by the remedial action selected in this ROD.

There are sources of groundwater contamination farther afield surrounding the former Montrose and Del Amo plant properties that are not likely to be affected by this remedy. These sources are not considered to be part of the Joint Site. Most of these are subject to cleanup investigation and/or other cleanup actions directed or overseen by the State of California. While EPA has made no such determination at present, it is possible that in the future such sources would be shown to have an influence on the Joint Site that cannot be avoided. By definition, these sources would then be part of the Joint Site.

The use of the term Joint Site does not imply that a formal Joint Site boundary exists that can be depicted on a map. Rather, EPA intends to give conceptual guidelines as to the area being addressed by the remedial action.

It is further noted that *Joint Site* refers not only to the existing known extent of contamination as described by the above bullet items, but to the *actual* extent of contamination so-described, whether known or not known, both presently and in the future.