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MEMORANDUM

TO: Phil Prete

FROM: Larry Rose

SUBJECT: United Metal Recyclers Landfill - Water Quality Data Review

There are 4 groundwater monitoring wells surrounding the landfill - 1 upgradient and 3 downgradient. The first sampling event was in December 1990. With the exception for 1991, sampling has been on a semiannual basis since then. We do not have any data for 1991. Apparently the wells were not sampled.

Beginning in 1997 samples from two downgradient wells (MW-3, and MW-4) started showing concentrations of benzene that exceeded the groundwater standard. Toluene, xylene, and ethylbenzene also have been detected. Indicator monitoring parameters such as TOC, TOX, BOD, COD, TDS, and chloride indicated possible contamination as early as 1992 even though VOC analyses were reported as non-detect. However, since the PQLs for the VOCs were not included in any report, we should use some caution accepting the results as non-detect. Concentrations for benzene and most of the indicator parameters has been increasing with each succeeding sampling event. The analyses for PCBs have all been reported as less than the detection limit.

The Landfill Evaluation report of November 1997 submitted to the Solid Waste Section was supposed to present evidence that the landfill had not effected groundwater at the site. A number of means were used to support that premise. One was a review of the groundwater data. Unfortunately a very narrow focus was taken. None of the meaningful data was mentioned. An effort was made to connect the natural geochemistry with the data for iron and manganese concentrations and ratios as if they were the only pollutants or indicators. Nothing was said about any of the other indicator parameters or organic compounds that have been detected. The modeling data presented was for leachate generation, rain infiltration, seepage and groundwater flow. It did not deal with pollutants.

The status of private wells around the landfill is not known. A 1992 Site Application for a landfill expansion reported "there are no known significant groundwater users in the vicinity."

There is already a groundwater file for the site that tracks the data and contains all of the correspondence.