DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
Interim Final 2/5/99
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
Current Human Exposures Under Control

Facility Name: **Precision Products Group, Inc. – Stone Industrial Division**
Facility Address: **9207 51st Avenue, College Park, MD 20740**
Facility EPA ID #: **MDD 058 594 920**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   ☒ If yes - check here and continue with #2 below.

   ☐ If no - re-evaluate existing data, or

   ☐ If data are not available, skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

The Stone Industrial facility is located in a commercial/residential area and is bordered to the northeast by the College Park Public Works, to the southeast by an auto body repair shop (Maaco), to the east by residential homes, and to the west by 51st Avenue (residential homes beyond 51st Avenue). B&O Railroad tracks run along the eastern border of the site.

The facility consists of three buildings enclosed in a fenced compound on a 17-acre lot. One building is designated as office space and two of the buildings are designated as plant buildings (Paper Winding Building and Plastic Winding Building). The site has manufactured custom spiral-wound products and tubing since 1950. The site was first purchased by Landrum Platt (owned Stone Industrial) in the 1930s as undeveloped land. The spiral wound tubing facility of Platt Corporation, was moved from Washington, D.C. to this location in College Park in 1950. In 1972, J.L. Clark Manufacturing Inc. purchased the site. On February 2, 1988, the facility notified the MDE its name was changing from J.L. Clark Manufacturing Company to CLARCOR. The site was still to be referred to as Stone Industrial, a member of the CLARCOR Precision Products Group. The facility manufactured paper and plastic tubes in the 1990s and currently manufactures plastic tubing for the household motor industry (motors for air conditions, refrigerators, etc.).

The facility currently operates under MDE State Operating Permit No. 033-0429 (set to expire May 31, 2014) for the following equipment:

- Two small natural gas boilers
- Twelve mylar winders that produce spiral wound plastic tubing
- Two small solvent recovery units
- One Reeco® regenerative thermal oxidizer that controls Volatile Organic Compound (VOC) emissions from the mylar winding and solvent recovery operations

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the

environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater		X		No evidence of releases to groundwater. Site and surrounding area are served by public water.
Air (indoors)[2]		X		No evidence of complaints or violations.
Surface Soil (e.g., <2 ft)		X		One release of Methyl Ethyl Ketone (MEK) occurred when a former UST was overfilled. The release was remediated under MDE supervision. No other evidence of releases to surface soil was found in files reviewed.
Surface Water		X		No evidence of releases to surface water was found in files reviewed.
Sediment		X		No evidence of releases to sediment was found in files reviewed.
Subsurf. Soil (e.g., >2 ft)		X		Several USTs have been removed; some soil removal activities took place.
Air (outdoors)		X		No evidence of complaints or violations.

☒ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

☐ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

☐ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

Groundwater - No monitoring wells exist on the property, therefore groundwater quality is not known. No evidence of releases to groundwater was found in files reviewed.

Indoor and Outdoor Air - The facility currently operates under MDE State Operating Permit No. 033-0429 (set to expire May 31, 2014) for the two natural gas boilers, twelve mylar winders that produce spiral wound plastic tubing, two small solvent recovery units, and one Reeco® regenerative thermal oxidizer that controls Volatile Organic Compound (VOC) emissions from the mylar winding and solvent recovery operations. No evidence of complaints or permit violations were found in files reviewed.

Surface Soil - On August 22, 1989, an MEK UST system was overfilled, resulting in the release of approximately 450 gallons of product. This tank system was comprised of two USTs; Tank Nos. 2 and 3, which were each 750 gallons in capacity and connected by piping (the facility referred to this as one UST when discussing the release). This tank was located near the northwestern corner of the Paper Winding Building. According to an October 9, 1989 from the facility to the MDE, the release was reported to the National Response Center (NRC) within an hour of being identified.

The spill migrated approximately 10 feet towards the adjoining College Park Public Works property. The MEK flowed 290 feet northeast across the Public Works property turning south on to the CSX Transportation property, flowing an additional

15 to 20 feet. The spill was contained and cleaned up (soil excavation) under the oversight of a Public Health Engineer from the Maryland Hazardous and Solid Waste Management Administration section of the MDE. This tank was removed on September 21, 1989 under supervision of the Prince George's County Fire Inspector.

All waste is managed and stored indoors.

Sediment/Surface Water - The nearest surface water body (Indian Creek) is located approximately 1,000 feet east of the site. This surface water is part of the Indian Branch which flows south and enters the Anacostia River which empties into the Potomac River. There are no outfalls or discharges to the creek. No evidence of releases to surface water or sediment was found in files reviewed.

Subsurface Soil - No evidence was found in files reviews indicating subsurface soil contamination currently exists. One Aboveground Storage Tank (AST) is in use and several Underground Storage Tanks (USTs) have been removed as summarized below:

- SWMU No. 5 - Current Wastewater Aboveground Storage Tank - This 6,000-gallon self-contained AST is used to store wastewater generated by the former wet grinding portion of the phenolic paper impregnation process. The high pH non-hazardous wastewater is removed from the tank twice per year by DuPont for offsite treatment and disposal. This tank replaced a wastewater UST (located near the former MEK UST location) in 1989. Lye used to clean equipment was also directed to the UST. No evidence of release was found in files reviewed.

- AOC No. 1 - Methyl Ethyl Ketone UST Release -discussed above

- AOC No. 2 - Location of 1980s Fire - In the late 1980s, a fire occurred when hot wax tubes and cardboard combusted inside the building. The sprinkler system activated and the Fire Department responded. Water generated during this event was directed to the former wastewater UST via sumps.

- AOC No. 3 - Underground Storage Tanks - the site historically maintained eleven USTs according to a figure in the 1989 Environmental Assessment Report (site representatives provided an updated figure which depicted additional removal information) as summarized below.

    - *Tank No. 1-* This 3,000-gallon wastewater UST was installed in 1953 and removed on April 30, 1996. According to an MDE Report Observations dated April 30, 1996, MDE visited the site to verify completion of remediation activities. This Report indicated the tank (and associated piping) had been removed in September 1995 and the excavated area was backfilled. Soil sample analysis (samples was identified as Pit Bottom) indicated no MEK or other VOCs in concentrations greater than detection limits. The work area needed to be graded and re-vegetated. New sumps were observed, which would drain to the 6,000-gallon wastewater AST located adjacent to the building (SWMU No. 5). The MDE representative noted the activities observed complete the requirements previously set for this area. No documented releases were found in files reviewed.

    - *Tank Nos. 2 and 3 -* See discussion of AOC No. 1 above.

    - *Tank Nos. 4, 5 6, and 11 -* Tank Nos. 4, 5, and 6 were 1,500-gallon isopropyl alcohol USTs installed in 1970 and removed on September 21, 1989. According to the 1989 Environmental Assessment Report, Tank No. 4 was described as leaking during an April 18, 1986 test. Facility representatives indicated that all piping was disconnected and use of the tank ceased. A Prince George's County Permit issued by the Fire Inspector dated September 22, 1989 indicated these tanks had been removed. No holes were observed in the tanks and no soil contamination was found. A soil sample was collected from the tank excavation and analyzed for isopropanol and MEK; neither compound was detected. Tank No. 11 was 1,500-gallon MEK UST installed in 1970 and removed on September 21, 1989. This tank was included in the Prince George's County Permit issued by the Fire Inspector dated September 22, 1989. No holes were observed in the tanks and no soil contamination was found. A soil sample was collected from the tank excavation and analyzed for isopropanol and MEK; neither compound was detected.

    - *Tank Nos. 7 and 8-* Tank No. 7 was a 10,000-gallon No. 2 oil UST installed in 1975 and removed on September 22, 1989. Tank No. 8 was an 8,000-gallon non-hazardous wastewater tank installed in 1982

and removed on September 22, 1989. Removal services for both tanks appear on an invoice dated October 10, 1992 from Tri County Industries. Tank No. 8 was replaced with SWMU No. 5. No information regarding tank excavation sampling or tank conditions; however no evidence of releases was found in files reviewed.

- *Tank No. 9-* Tank No. 9 was a 10,000-gallon No. 2 oil tank installed in 1974 and removed on June 1, 1985. According to facility representatives, this tank was partially buried in the ground (half of this tank was aboveground, while the other half was below). According to the 1989 Environmental Assessment Report, this tank passed a tightness test on June 1, 1985. No information relating to the tank's condition upon removal or releases was found in files reviewed.

- *Tank No. 10 -* Tank No. 10 was a 4,000-gallon No. 2 oil UST installed in 1954 and removed between July 28 and 29, 1988 when the boiler was converted to natural gas. According to a Purchase Order issued by J.L Clark Manufacturing to Stone and Hoover Contracting on July 21, 1988, this tank and piping were to be removed in the presence of the Prince George's County Fire Marshal, the excavation backfilled, and asphalt paving restored. Facility representatives reported this tank was removed in accordance with the Purchase Order. According to the 1989 Environmental Assessment Report, this tank passed a tightness test on February 10, 1988. No information relating to the tank's condition upon removal or releases was found in files reviewed, however no evidence of releases was found in files reviewed.

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3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media, which are not "contaminated" as identified in #2 above.

2. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

☐ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

☐ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

☐ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

☐ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

☐ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

☐ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

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5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

☐ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

☐ If no - (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

☐ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code.

Rationale and Reference(s):

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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI (event code CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

☒ YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Precision Products Group - Stone Industrial Division facility, EPA ID # MDD 058 594 920, located at 9207 51st Avenue, College Park, MD 20740. Specifically, this determination indicates that the migration of "contaminated" groundwater is under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

☐ NO - "Current Human Exposures" are NOT "Under Control."

☐ IN - More information is needed to make a determination.

Completed by (signature) -s- Date 8/12/10
(print) Denis Zielinski
(title) Senior RPM

Supervisor (signature) -s- Date 8/18/10
(print) Luis Pizarro
(title) Associate Director
EPA Region III

Locations where References may be found:

US EPA Region III
Land & Chemicals Division
1650 Arch Street
Philadelphia, PA 19103

Contact telephone and e-mail numbers
(name) Denis M. Zielinski
(phone #) 215-814-3431
(e-mail) zielinski.denis@epa.gov