

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: Bassett Mirror Co., Philpott Plant

Facility Address: 1290 Philpott Drive, Bassett, VA 24055

Facility EPA ID #: VAD 003 124 633

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

Bassett Mirror is located at 1290 Philpott Drive in Henry County, Bassett, Virginia approximately 45 miles south of Roanoke, Virginia. The facility is located on a 19.6 acre site. Bassett Mirror Company, Philpott Plant (Bassett Mirror) was built in 1973. The Philpott Plant houses an administrative office, manufacturing processes, and storage facilities. The facility manufactures and/or assembles furniture, mirrors, and artwork. Approximately 90% of home décor items processed at the facility are imported and undergo packing or warehousing/shipping operations. Manufacturing operations are approximated to comprise 10% of the facilities output. Currently the facility employees approximately 50 individuals, operating one shift, 5 days per week.

The facility operates a permitted non-transient, non-community public water supply well, and wastewater treatment system. Virginia Pollution Discharge Elimination System (VPDES) Permit VA 0086665 is maintained for the facility with 3 outfalls (001 Sanitary System, 002 & 003 Stormwater). The facility was granted a State Operating Permit on July 13, 1998, superseding the facility's permit dated September 7, 1977.

Facility representatives indicate historically one underground diesel storage tank was located at the facility. This 20,000 gallon steel unit was located on the exterior east side of the facility and had an approximate operational timeframe from 1972 until 1993. Diesel was used at the facility in the early 1970s as a backup fuel for the coal boiler. The tank was used for fueling vehicles from the 1970s through the late 1980s. In November 1993 the unit was removed, and confirmatory sampling indicated no releases to the environment.

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)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		X		No documented releases to groundwater
Air (indoors) ²		X		No indoor air issues
Surface Soil (e.g., <2 ft)		X		Contamination associated with one SWMU has been remediated
Surface Water		X		Three outfalls discharge to the Town Creek, however there is no reason to believe surface water is contaminated by Bassett
Sediment		X		Three outfalls discharge to the Town Creek, however there is no reason to believe sediment is contaminated by Bassett
Subsurf. Soil (e.g., >2 ft)		X		Contamination associated with one SWMU has been remediated
Air (outdoors)		X		No operations take place outdoors

- 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):

While groundwater has not been sampled, it has not been of concern through clean closure of several SWMUs.

No indoor or outdoor air issues were identified during the TtEC 2007 RCRA Site Visit.

One documented release impacted soil at the facility. This release was remediated under the Closure of SWMU No. 2, The Former Waste Pile. The Former Waste Pile underwent Closure under a Consent Order and the VDEQ granted approval of the clean closure certification of SWMU No. 2, Former Waste Pile on September 13, 1999.

The closest surface water body to the facility is Town Creek, which forms the southern facility property line. The facility discharges stormwater through Outfalls 002 and 003 and treated sanitary sewer effluent through Outfall 001 into Town Creek under VPDES Permit No 0086665 (a third outfall discharges to the sanitary sewer). The facility has been cited for violations of testing, and documentation of effluent. March 2007 documentation indicates that the aluminum concentration from Outfall 002 is greater than twice the acceptable benchmark, and that Storm Water Pollution Preventions Plans, in association with Best Management Practices at the facility should be reviewed. Exceedance of benchmark concentrations does not constitute a permit violation. Attempts to locate the aluminum sources have proved inconclusive.

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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)

<u>“Contaminated” Media</u>	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 Bassett Mirror Co., Philpott Plant, EPA ID # VAD 003 124 633, located at 1290 Philpott Drive, Bassett, Virginia 24055. 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) _____ Date 1/22/09
(print) Denis Zielinski
(title) _____

Supervisor (signature) _____ Date 1/22/09
(print) Luis Pizarro
(title) _____
(EPA Region or State) _____

Locations where References may be found:

US EPA Region III
Waste & Chemicals Management Division
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