

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)
Migration of Contaminated Groundwater Under Control**

Facility Name: Production Components Corporation
Facility Address: 701-D West Fifth Street, Lansdale, Pennsylvania 19446
Facility EPA ID #: PAD000431957

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, 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 #8 and enter "IN" (more information needed) status code.

BACKGROUND

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 "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "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 "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

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. Is **groundwater** known or reasonably suspected to be “contaminated”¹ above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?
- If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.
- If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”
- If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

Facility Background Information:

Production Components Corporation (PCC or Facility) is located in Lansdale Borough, Montgomery County, Pennsylvania in an industrial/commercial area. Two separate buildings (Building 1 and Building 2) are located on the 3.7 acre property. Building 1 is located on West Fifth Street and is approximately 80,000 square feet and is divided into three separate suites: PCC currently leases the northwest suite, the southeast suite is occupied by Handelok Bag Company, and the remaining space is unoccupied. Building 2 is located on Mitchell Avenue directly north of Building 1. Building 2 is approximately 21,000 square feet and is divided into two separate suites: one is approximately 12,000 square feet and the other is approximately 9,000 square feet. PCC occupies the 12,000 square feet suite and the smaller 9,000 square feet is occupied by Service Tire and Truck Center.

In 1981, PCC was founded and initially leased and operated out of the 9,000 square foot suite located on the southwest end of Building 2 before expanding into the 12,000 square feet suite. In 1990, PCC again expanded its operations, moving into the 25,000 square feet suite in Building 1. PCC provides precision sheet metals services and uses conventional and computer controlled fabrication equipment to manufacture a variety of panels, enclosures, covers, frames, brackets, and cabinets. Materials for fabrication include steel, stainless steel, aluminum, and various other alloys. PCC also provides paint and powder coat finishing. PCC’s administrative areas, as well as the sheet metal fabrication operations are located in Building 1. The Facility’s paint line and phosphate cleaning system are located in Building 2. PCC leases the Facility from 701 West Associates LLC.

Prior to PCC leasing the facility, it was leased to Eaton Laboratories, Inc. (Eaton) between 1978 and 1986. Eaton was the first company to lease and operate out of the 25,000 square foot suite in the northwest end of Building 1 which is now occupied by PCC. Eaton was a manufacturer of textile chemicals, dry cleaning auxiliary chemicals, and maintenance chemicals (detergents and cleaners). Eaton used aromatic 150, kerosene, perchloroethene (PCE), 1,1,1-trichloroethane (TCA), and possibly trichloroethene (TCE).

RCRA Regulatory Status:

Due to the prior operations conducted by Eaton, the Facility is subject to EPA’s Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

Footnotes:

¹“Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

On June 2, 2011, Michael Jr. Baker, Inc. (Baker) conducted an Environmental Indicator (EI) Inspection of PCC, on behalf of EPA. An EPA representative was present during the EI Inspection. The findings of the EI Inspection are documented in a November 2011 EI Inspection Report for Production Components Corporation, prepared by Baker. Information gathered during the EI Inspection identified the Facility as a Small Quantity Generator (SQG; less than 1,000 kg/month) of hazardous waste.

For additional information regarding historical and current generation and management of hazardous waste at the Facility, please refer to Section A of the November 2011 EI Inspection Report.

Solid Waste Management Units:

Although no formal Solid Waste Management Units (SWMUs) have been identified for the Facility, three (3) SWMUs were observed during the June 2011 site visit. A brief description of each SMUW is provided below. Additional information regarding the three (3) SWMUs may be found in Section B of the EI Inspection Report.

SWMU No. 1 – Spent Solvent Waste Drum Area: One 55-gallon drum containing spent solvent (methyl ethyl ketone (MEK), toluene, and xylene) was observed in the Facility's flammable materials storage area at the time of the June 2011 site visit. The spent solvent is generated from cleaning of the Facility's spray paint guns and other painting equipment. The flammable materials storage area is an enclosed, explosion proof room located inside the northeast end of Building 2. The walls are painted concrete block with a concrete floor. The spent solvent is shipped off-site as a hazardous waste under the EPA Hazardous Waste Codes D001 (ignitable), F003 (spent non-halogenated solvents – xylene) and F005 (spent non-halogenated solvents – toluene, MEK). There are no known or documented releases for this area.

SWMU No. 2 – Waste Paint Related Materials Accumulation Area: The Facility stores drums containing waste paint filters and paper contaminated with paint overspray on the concrete floor adjacent to the paint booth which is located northwest of the iron phosphate cleaning line. These waste materials are shipped off-site as a hazardous waste under the EPA Hazardous Waste Codes F003 (spent non-halogenated solvents – xylene) and F005 (spent non-halogenated solvents – toluene, MEK). There are no known or documented releases for this area.

SWMU No. 3 – Baghouse Dust Accumulation Area: The Facility operates two dust collectors (i.e., baghouses) which are located on the northwest wall of Building 1. The baghouse dust is collected in a 55-gallon drum and is disposed of a municipal waste. This waste stream was determined to be non-hazardous in 1993 via a request by the Pennsylvania Department of Environmental Protection (PADEP). There are no known or documented releases for this area.

Summary of Environmental History:

The Facility is located within the North Penn Area 6 Superfund Site which is largely a groundwater contamination problem encompassing the area in and around the Borough of Lansdale, Pennsylvania. The North Penn Area 6 Superfund Site was added to the National Priorities List (NPL) on March 31, 1989. TCE and PCE are the primary contaminants in the groundwater, the chemical components of solvents and degreasers, although several other contaminants are present. Twenty-six facilities in the Lansdale area, including the former Eaton facility, were originally identified as possible sources of contamination due to their use of site-related solvents.

Potential soil and groundwater contamination occurring as a result of Eaton's operations was evaluated as part of a 1991 Phase II RI/FS Focused Feasibility Study. Eight soil samples were collected from the former Eaton property and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and pesticides/polychlorinated biphenyls (PCBs). Based on the results of the soil sampling, Eaton was not identified as a PRP that was held liable for the soil and groundwater remediation in the area. For more information regarding the North Penn Area 6 Superfund Site, please refer to Section B of the EI Inspection Report or visit:

<http://www.epa.gov/reg3hwmnd/super/sites/PAD980926976/index.htm>

Groundwater:

Although groundwater beneath the Site is known to be contaminated above appropriately protective levels (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria), such groundwater contamination is not a result of releases subject to RCRA Corrective Action, anywhere at, or from, the Facility. There is no evidence to show that Eaton or PCC contributed to such contamination. This determination is based on sampling

conducted at the Eaton property by Superfund in the early 1990s and an evaluation of the operations performed by PCC, the types and volumes of hazardous materials utilized by the Facility, and the fact that this Facility is located within an active Superfund Site that is addressing groundwater contamination in and around the Borough of Lansdale. In addition, the entire property is covered with impermeable surfaces, such as, concrete slabs and asphalt paving which would inhibit a release of hazardous waste or constituents to site soils and groundwater.

Drinking water is provided to the Facility and surrounding area by the North Penn Water Authority (NPWA). Approximately eighty percent of the water that NPWA delivers to its customers is treated surface water from the Forest Park Water Treatment Plant (FPWTP) located in Chalfont. The source of water that is treated at FPWTP is the North Branch Neshaminy Creek. NPWA also operates twenty-seven groundwater wells located throughout our service territory, in Bucks and Montgomery Counties. In 2008, NPWA completed a wellhead protection study, assisted by grant money from the Pennsylvania Department of Environmental Protection (PADEP). The study provided valuable information to the NPWA such as: identifying the protection zone around each well, identifying potential sources of contamination for each well, identifying the land areas around the wells, and the underground geologic layers, that are within the pumping zones of influence. This assists NPWA in dealing with emergency response in case of a hazardous spill event that could threaten the well, so that remedial measures could be put in place. Also, implementation of contingency planning could involve revisions to local land use practices, if necessary, to protect the integrity of the groundwater supply. In addition, NPWA continues to partner with other Bucks County water utilities in an effort to protect wells located in the Penridge area. Work on this project began in 2005 and is sponsored by a grant approved by PADEP.

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within “existing area of contaminated groundwater”² as defined by the monitoring locations designated at the time of this determination)?
- If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the “existing area of groundwater contamination”²).
 - If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the “existing area of groundwater contamination”²) – skip to #8 and enter “NO” status code, after providing an explanation.
 - If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

²“existing area of contaminated groundwater” is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of “contamination” that can and will be sampled/tested in the future to physically verify that all “contaminated” groundwater remains within this area, and that the further migration of “contaminated” groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

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4. Does “contaminated” groundwater **discharge** into **surface water** bodies?
- If yes - continue after identifying potentially affected surface water bodies.
 - If no - skip to #7 (and enter a “YE” status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater “contamination” does not enter surface water bodies.
 - If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

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5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater “level,” and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?
- If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration₃ of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
 - If no - (the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration₃ of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations₃ greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.
 - If unknown - enter “IN” status code in #8.

Rationale and Reference(s):

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?
- If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment⁵, appropriate to the potential for impact that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.
- If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.
- If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s):

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the “existing area of contaminated groundwater?”
- If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the “existing area of groundwater contamination.”
 - If no - enter “NO” status code in #8.
 - If unknown - enter “IN” status code in #8.

Rationale and Reference(s):

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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), 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, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the B. Braun Medical, Inc. Facility, EPA ID No. PAD982679169, located at 901 Marcon Boulevard, Allentown, Pennsylvania 18109. This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.
- NO - Unacceptable migration of contaminated groundwater is observed or expected.
- IN - More information is needed to make a determination.

Completed by	(signature) 	Date	4/19/12
	(print) Jeanna R. Henry		
	(title) Remedial Project Manager		
Supervisor	(signature) 	Date	4-19-12
	(print) Paul Gotthold		
	(title) Associate Director		
	EPA Region III		

Locations where References may be found:

US EPA Region III
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