

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
Current Human Exposures 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 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 #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 "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, GPRRA). 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		See rational below.
Air (indoors) ²		X		See rational below.
Surface Soil (e.g., <2 ft)		X		See rational below.
Surface Water		X		See rational below.
Sediment		X		See rational below.
Subsurf. Soil (e.g., >2 ft)		X		See rational below.
Air (outdoors)		X		See rational below.

- 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):

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

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 appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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.

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 by Superfund during 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 potential responsible party (PRP) for the extensive soil and groundwater contamination in the North Penn Area 6 Superfund Site. 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/reg3hwmd/super/sites/PAD980926976/index.htm>

Although groundwater beneath the Facility property is known to be contaminated above appropriately protective risk-based levels (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.

Evaluation of Potential Human Exposures:

EPA has determine 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 Facility (i.e., site-wide)).

1. *Groundwater:* 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.
2. *Indoor and Outdoor Air:* Generally, exposure to on-site workers via the indoor air pathway can be attributed to regular Facility operations due to the usage of solvents, paints, particulates, etc. The Facility does not operate under any air permits as no air emissions sources are currently present at the Facility.
3. *Surface Soils and Subsurface Soils:* The entire property is covered with impermeable surfaces, such as, concrete slabs and asphalt paving which eliminate the potential exposure pathway to surface and subsurface soils.
4. *Surface Water and Sediment:* Neshaminy Creek is the principal surface water feature near the Facility (approximately 0.2 miles north), which flows northeast. The creek is designated as a warm water fishery and is listed on the streams integrated list (reported for the Clean Water Act) as a non-attaining segment, impaired for aquatic life.

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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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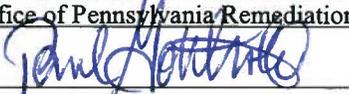
5. Can the “significant” exposures (identified in #4) be shown to be within acceptable limits?
- If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “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 Production Components Corporation facility, EPA ID No. PAD000431957, located at 701-D West Fifth Street, Lansdale, Pennsylvania 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	<u>(signature) </u> <u>(print) Jeanna R. Henry</u> <u>(title) Remedial Project Manager</u> <u>Office of Pennsylvania Remediation</u>	Date <u>4/19/12</u>
Supervisor	<u>(signature) </u> <u>(print) Paul Gotthold</u> <u>(title) Associate Director</u> <u>Office of Pennsylvania Remediation</u> <u>EPA Region 3</u>	Date <u>4-19-12</u>

Locations where References may be found:

US EPA Region III
Land & Chemicals Division
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