

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: **Federal-Mogul Corporation**

Facility Address: **Garfield Avenue and Race Street Lancaster, PA 17604**

Facility EPA ID #: **PAD991298266**

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

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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Background:

Federal-Mogul Corporation (Fed-Mogul or “the Facility”) operated a ball-bearing manufacturing facility on a 3.42-acre property on Garfield Avenue (between Race Street and N. West End Avenue), in Lancaster, Pennsylvania from the mid-1950s through the mid-1990s. The Facility contains two separate single-story structures which accommodated approximately 80,000 square feet of manufacturing space and 3,000 square feet of office space. The buildings are separated by three open courtyards. Manufacturing processes at the facility included machining, press work, heat treating, and grinding. The Facility is located in a light industrial, commercial, and residential use zone.

Several investigations have been conducted at Fed-Mogul: Facility Cleanup Report (1999), Site Characterization Report (2000), and investigations to meet Pennsylvania Department of Environmental Protection (PADEP) Act 2 requirements (2000 to 2004). In addition, non-site related investigations were historically performed both upgradient and downgradient of the facility. The most recent investigation was completed at EPA’s request in December 2011 to assess the vapor intrusion pathway inside the east building.

Federal-Mogul, Garfield Business Center LP (owner of the property immediately after Fed-Mogul), and PADEP executed a Consent Order and Agreement (COA) on July 2, 2004, requiring Fed-Mogul to obtain liability protection under Act 2 for the Facility. On August 30, 2004, PADEP approved the Facility’s Remedial Investigation and Final Report (RIFR) and provided a letter to Federal-Mogul stating that the site is contaminated with petroleum hydrocarbons and chlorobenzene in soil and groundwater related to leaking storage tanks and manufacturing processes. A site-specific standard was attained by pathway elimination and a post-remediation care plan. A deed notice acknowledging the presence of hazardous constituents at the Facility was required because site-specific standards were attained. Although remediation under Act 2 was considered complete for the site, the PADEP letter advised that any future earth disturbance or development may require either approvals or permits from the appropriate county soil conservation district. This liability protection obtained from PADEP on August 30, 2004 was transferred to Garfield Center, LLC, and subsequently to the current owner, the K & W Tire Company (K&W).

The K&W Tire Company (K&W) currently uses the property for warehouse operations and office space. K&W leases portions of the buildings to tenants for use as warehouse space and retail stores. The building on the western half of the property is currently occupied by Nolt’s Auto Parts and Gallo Kitchen & Bath. None of the current business operating at the Facility are listed hazardous waste generators. A deed restriction that will remain with the property in future conveyances and transfers of ownership allows for only non-residential use of the property and prohibits the use of groundwater for any drinking or agricultural purpose.

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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			Barium and chrysene detected on-site above EPA RSLs and PADEP MSCs. Chlorobenzene detected downgradient above RSLs and MSCs.
Air (indoors) ²		X		Multiple lines of evidence evaluation indicates indoor air quality is not significantly impacted by remaining contaminants in soil and groundwater
Surface Soil (e.g., <2 ft)		X		Arsenic below NR SWHS MSCs.
Surface Water		X		No impacts to surface water suspected.
Sediment		X		No impacts to sediment suspected.
Subsurf. Soil (e.g., >2 ft)		X		Arsenic below NR SWHS MSCs. Chlorobenzene and benzene above Soil-to-Groundwater MSCs but Lancaster has Non-Use Aquifer Designation.
Air (outdoors)		X		There are no current operations that release to the air exposure pathway.

_____ 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.

 X 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):
See following pages.

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.

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Groundwater:

The Facility is located within the Piedmont Physiographic Province, and is underlain primarily by Cambrian-aged dolomite of the Ledger Formation. The presence of shallow groundwater in the overburden at the Facility was variable during the site characterization, with recoverable groundwater available in less than 10 percent (4 out of 48) of the soil borings. Where present, shallow groundwater was found at the interface between a clayey, silty soil and saprolite and the underlying bedrock. The depth to bedrock at the property varied between 5 to 15 feet bgs (shallower in the west courtyard (5 to 8 feet bgs) than the east courtyard and southern side of the property (12 to 15 feet bgs)). The shallow groundwater has been interpreted to be present under localized perched conditions since groundwater elevations in soil borings were higher than the groundwater encountered in the bedrock. Groundwater in the fractured karstic bedrock was present at a depth ranging from 36 to 57 feet bgs and a radial flow direction was considered probable. Investigations at a facility located southwest of the former Fed-Mogul facility identified a contiguous, perched aquifer beneath that property which possibly could flow north/northeast towards the former Federal-Mogul facility.

In January 2000, a consultant for Fed-Mogul conducted an initial subsurface investigation that included the installation of 48 soil borings. Grab groundwater samples were collected from the four soil borings locations that yielded enough water for sample collection. Barium was detected in the groundwater at one location (SB-47, between Building 8 and the railroad) at a concentration of 9.51 mg/L, which exceeded the Residential Medium Specific Concentrations (MSC) of 2 mg/L as well as its EPA Regional Screening Level (RSL) of 2.9 mg/L for tap water. Chrysene was detected in the shallow groundwater at one location (SB-10 outside Building 8 adjacent to the railroad) at a concentration of 2.79 µg/L, which exceeded its MSC of 1.9 µg/L. This chrysene concentration did not exceed EPA's tapwater RSL of 2.9 µg/L. The above MSCs were interpreted in the June 2004 RIFR to be inapplicable to perched groundwater pursuant to PA Code 250.303, subsection (a). After the RIFR was submitted, PADEP designated the City of Lancaster with non-use aquifer status on November 20, 2007. While the chrysene MSC remains 1.9 µg/L for non-use aquifers, the barium groundwater MSC for a non-use aquifer is 2,000 mg/kg, more than two orders of magnitude greater than the concentration observed at the Facility.

Four bedrock monitoring wells were installed by a consultant for Fed-Mogul in January 2001. These wells were sampled four times each between February 2001 and October 2002. No contaminants were detected in any of the samples collected from the bedrock aquifer at concentrations above the MSCs for residential or non-residential scenarios. Chlorobenzene was detected in the bedrock monitoring wells located in the east courtyard and the central courtyard at a concentration as high as 96 µg/L, which is below the groundwater used aquifer MSC and EPA's maximum contaminant level (MCL) of 100 µg/L. The non-use aquifer MSC for chlorobenzene is 10,000 µg/L.

Chlorobenzene and benzene were detected in soil samples within a limited area (Buildings 3/4 and the east courtyard) of the facility at concentrations above PADEP's Soil-to-Groundwater MSCs for residential and nonresidential scenarios. Soils with elevated chlorobenzene concentrations were documented at sample locations SB-28 and SB-29 (located within the southeastern end of Building 3) and sample locations SB-31 and SB-33 (located in the east courtyard). Soils with elevated benzene concentrations were documented at sample location SB-43 (located within Building 4). Chlorobenzene and benzene, however, were never detected at concentrations above the MSCs in any of the facility-installed wells.

The ACM Company, Inc. (ACM) is an office equipment supplier located at the corner of Garfield and West End Avenues directly across the street from the northeastern corner of the Facility. While ACM is across the street from the Facility, it is physically located in Manheim Township, not the City of Lancaster. Unlike the City of Lancaster, Manheim Township is not a designated non-use aquifer area. The ACM property has been subject to remedial activity and investigation since the removal of a 1,000-gallon underground storage tank (UST) from its property on October 5, 2000, and the subsequent discovery of an unleaded gasoline release. Contaminated soil and non-aqueous phase liquid (NAPL) were removed and a pump-and-treat system went into operation on March 3, 2004. In 2003, ACM's consultant informed PADEP that in addition to the gasoline related contaminants, shallow groundwater beneath ACM also contained concentrations of chlorobenzene and chrysene in exceedance of their respective Residential Used Aquifer MSCs. The only apparent source of the chlorobenzene and chrysene contamination is the Fed-Mogul facility.

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ACM's groundwater extraction system is likely capturing the chlorobenzene and chrysene plumes in addition to the gasoline-related compounds. Since the pump and treat system has been in operation, concentrations of gasoline-related compounds have dropped significantly in ACM's monitoring wells. For example, benzene in MW-1 has dropped from as high as 463 ug/l in February 2001 to 9.16 ug/l in February 2009. Reductions in concentrations of chlorobenzene have not been as dramatic, but the general trend has been downward over time. The highest concentration observed within the three split samples collected by PADEP in May 2009 was 121 ug/l in MW-5 (still above the MSC of 100 ug/l but below the 191 ug/l seen in November 2003 at that location). Concentrations of chrysene in the three split samples were all below its residential used aquifer MSC (1.9 µg/L).

Air (Indoors):

Four on-site wells were sampled four times each for volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) between February 2001 and October 2002. No indoor air chemicals of concern were detected above their respective PADEP used aquifer medium-specific concentrations (MSCs) or above the Target Groundwater Concentrations in the Generic Screening Table (Table 2c) of the EPA Draft Vapor Intrusion Guidance. It should be noted that chlorobenzene was detected in two of the wells (MW-1B and MW-3B) at concentrations as high as 96 ug/l (MSC is 100 ug/l and target GW concentration for indoor air is 390 ug/l for a Hazard Index of 1.0). Historic groundwater samples collected at the adjacent ACM Company have contained chlorobenzene at a concentration as high as 189 ug/l, but a downward trend has been established for this contaminant, primarily due to the pump and treat efforts associated with the former leaking UST on that property. Based on the above, the groundwater to indoor air pathway is not suspected to be significant.

As part of the Site Characterization and RIFR, benzene and chlorobenzene were found above the non-residential volatilization to indoor air screening levels of 13 mg./kg. and 0.63 mg./kg., respectively. These contaminants were detected in soil samples in a limited area of the facility (Buildings 3/4 and the east courtyard). The RIFR utilized the Johnson and Ettinger (J&E) Model to show that the benzene and chlorobenzene concentrations detected in soil at the facility are protective of indoor air assuming a nonresidential scenario. Since EPA does not rely on soil data to predict indoor air intrusion, Federal Mogul was asked to conduct sub-slab soil gas/indoor air sampling at the facility.

A consultant for Fed-Mogul completed the indoor air/sub-slab soil gas sampling on October 29-30, 2011. Benzene was found in an indoor air sample at a concentration of 0.78 ug/m³, which is below PADEP's Non-residential MSC of 11 ug/m³ and EPA's RSL of 1.6 ug/m³. Benzene was not detected in the corresponding sub-slab soil gas sample but it was detected in an outdoor air sample at 0.62 ug/m³, indicating that the indoor air result is likely related to the outdoor ambient air quality and not the soil quality beneath the building. Chlorobenzene was not detected in any of the samples collected during the sampling event. The sampling effort confirmed the results of the previously run J&E model that the indoor air quality within the Facility building is protective for human health.

Surface and Subsurface Soils:

Historically, seven solid waste management units (SWMUs) and four areas of concern (AOCs) were identified at the Facility. These are no longer in existence since operations ceased, and in some cases (such as the underground storage tanks (USTs)), they were removed or abandoned-in-place. Full descriptions of the SWMUs and AOCs are contained in the March 2010 Environmental Indicator Inspection Report completed by Michael Baker Jr., Inc., a contractor for PADEP.

As part of the 2000 Site Characterization, 68 soil samples were collected from 48 soil borings located across the facility, and analyzed for volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), RCRA metals, and cyanide, with individual sample parameters determined based on the boring location. Thirty eight (38) additional samples were collected from 24 soil borings and two surface locations in December 2000/January 2001 during a supplemental site characterization.

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During the initial site characterization, petroleum hydrocarbon-affected soils were encountered at the contact between the overburden and bedrock. Soils at this interface were sometimes observed to be discolored or exhibiting an odor, but no free phase petroleum product was ever encountered. Although PAHs were typically detected in samples collected from the petroleum impacted soil borings, none of these compounds were detected at concentrations above the applicable PADEP MSCs. Benzene was detected in one soil sample collected from SB-43 at a depth of 6' to 9' bgs at a concentration of 1.3 mg/kg, which exceeds the soil to groundwater MSC of 0.5 mg/kg but does not exceed the residential direct contact MSC of 57 mg/kg or the industrial soil RSL of 5.4 mg/kg.

Chlorobenzene, as high as 20 mg/kg in soil boring SB-28, was detected in a total of four subsurface samples (10' – 13' bgs) above the soil to groundwater MSC of 10 mg/kg. This contamination appears to be limited to the East Courtyard and beneath a portion of the adjacent East Building. No sample contained chlorobenzene at levels exceeding the residential direct contact MSC of 960 mg/kg or RSL of 290 mg/kg and this contaminant was not detected above any applicable MSC in any of the surface soil samples collected.

Arsenic was the only constituent detected in site soil samples at concentrations above the residential direct contact MSC (12 mg/kg). Six samples, all located on the western portion of the facility both north and south of the West Building, contained arsenic ranging from 12.4 mg/kg to 20.8 mg/kg. None of the samples exceeded the non-residential direct contact MSC of 53 mg/kg or the soil to groundwater MSC of 29 mg/kg.

Since both the benzene and chlorobenzene concentrations exceed only the soil to groundwater MSCs, these compounds are addressed through the City of Lancaster's non-use aquifer designation. Sub-slab soil gas/indoor air sampling and modeling has demonstrated that soil contaminants pose no risk to indoor air quality to future facility workers. A deed restriction, already in place, allows for only non-residential use of the property so the arsenic concentrations seen in the site soils are protective of human health. Therefore, site soils are not contaminated above appropriately protective risk-based levels.

Surface Water/Sediment:

No surface water features were identified in the immediate site vicinity. A small tributary of Little Conestoga Creek is located approximately 0.3 mile north of the Facility, Little Conestoga Creek is approximately 1 mile west, and the Conestoga River is approximately 2 miles east. The facility receives its water from and discharges its waste water to the City of Lancaster. The City of Lancaster utilizes independent sanitary and storm sewer lines. Sanitary sewer lines deliver domestic and industrial sewage directly to the City's POTW. During rain events, the storm sewer collects stormwater and delivers it to the Conestoga River and/or Little Conestoga Creek. There are no known or suspected impacts to the Conestoga River or its sediments attributable to the Fed-Mogul Facility.

Air (outdoors):

A release of contaminants from the facility to the air above a risk-based level is not suspected. The concentrations of benzene and chlorobenzene in the subsurface do not warrant a concern for a release to the atmosphere.

Ref: Indoor Air and Sub-Slab Vapor Report of Findings, prepared by WSP Environment & Energy, December 16, 2011; Final Environmental Indicator Inspection Report for Federal-Mogul Corporation, prepared by Michael Baker Jr., Inc., March 2010; Remedial Investigation and Final Report for Federal-Mogul Corporation Facility, prepared by Environmental Strategies Consulting, LLC, June 21, 2004; Site Characterization Report for Federal-Mogul Corporation Facility, prepared by Environmental Strategies Consulting, LLC, April 14, 2000.

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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

Contaminated Media	Potential <u>Human Receptors</u> (Under Current Conditions)						
	<u>Residents</u>	<u>Workers</u>	<u>Day-Care</u>	<u>Construction</u>	<u>Trespassers</u>	<u>Recreation</u>	<u>Food</u> ³
Groundwater (offsite)	No	No	No	No	No	No	No
Air (indoors—offsite)	-	-	-	-	-	-	-
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.

 X 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.

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

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Rationale and Reference(s):

As described in the answer to Question No. 2 above, grab groundwater samples collected during the installation of soil borings in 2000 contained barium and chrysene in excess of residential MSCs. No contaminants, including barium and chrysene were detected above residential MSCs during the four rounds of sampling conducted at the site between February 2001 and October 2002. Chlorobenzene was detected in two of the four on-site monitoring wells at concentrations as high as 96 µg/L, which is below the groundwater used aquifer MSC and EPA's maximum contaminant level (MCL) of 100 µg/L. Chlorobenzene and chrysene, however, have both been detected off-site on the ACM property at concentrations exceeding their respective residential MSCs.

Despite the exceedances of the MSCs/MCLs, there is no complete pathway between the contaminated groundwater and human receptors. The City of Lancaster is a PADEP-designated non-use aquifer area, which means that groundwater derived from wells or springs for drinking or agricultural purposes is prohibited within the city limits and all downgradient properties are connected to a community water system. While Manheim Township is not covered by the Lancaster non-use aquifer designation, it does have an ordinance in place (Section 11-3003) that requires all property owners to make connection with the public water system wherever the water system is available for public use. The PADEP Act 2 Post-Remediation Care Plan required a 5-year annual water use survey to ensure that properties within a 0.5 mile radius of the facility did not use the upper bedrock aquifer for purposes other than industrial supply. According to the annual surveys, the last known drinking water well, located at 1140 Dillerville Road (0.3 mile from the Facility), was connected to the Lancaster City public water supply in 2007.

Ref: Indoor Air and Sub-Slab Vapor Report of Findings, prepared by WSP Environment & Energy, December 16, 2011; Final Environmental Indicator Inspection Report for Federal-Mogul Corporation, prepared by Michael Baker Jr., Inc., March 2010; Remedial Investigation and Final Report for Federal-Mogul Corporation Facility, prepared by Environmental Strategies Consulting, LLC, June 21, 2004; Site Characterization Report for Federal-Mogul Corporation Facility, prepared by Environmental Strategies Consulting, LLC, April 14, 2000.

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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):

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):

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.

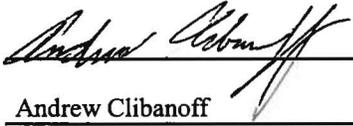
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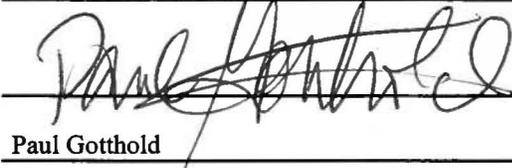
6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

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 Federal-Mogul Corporation facility, EPA ID # PAD991298266, located at Garfield Avenue and Race Street Lancaster, PA 17604 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 1/24/12
(print) Andrew Clibanoff
(title) RCRA Project Manager

Supervisor (signature)  Date 1-25-12
(print) Paul Gotthold
(title) Associate Director, Office of PA Remediation
(EPA Region or State) U.S. EPA Region III

Locations where References may be found:

USEPA Region III
Waste and Chemical Mgmt. Division
1650 Arch Street
Philadelphia, PA 19103

PADEP
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110

Contact telephone and e-mail numbers

(signature) _____
(print) _____
(title) _____

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.