

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: Safety-Kleen Systems, Inc.
Facility Address: 10 Eleanor Drive, New Kingstown, PA 17072
Facility EPA ID #: PAD 000738823

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, GPR). 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).

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

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 | | |
| Air (indoors) ² | | X | | |
| Surface Soil (e.g., <2 ft) | | X | | |
| Surface Water | | X | | |
| Sediment | | X | | |
| Subsurf. Soil (e.g., >2 ft) | | X | | |
| Air (outdoors) | | X | | |

- 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:

Groundwater: The most recent First Quarter 2016 Groundwater Monitoring Report in Support of Act 2 Closure data show there are currently no groundwater contaminants in excess of EPA Maximum Contaminant Levels, and therefore, no current risks. Historically, groundwater has been impacted by Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), and metals.

Air (indoors): Soil data was evaluated using Pennsylvania Department of Environmental Protection (PADEP) guidance and submitted in the 2012 Act 2 Soil Closure report. Ethylbenzene and xylenes were detected in soils as estimated values well below screening criteria. The indoor air pathway was found to not be an inhalation concern and, furthermore, not a complete pathway due to the epoxy coated/sealed floors that act as a vapor barrier.

The historic highest concentration levels identified in groundwater were run through the EPA Vapor Intrusion Screening Level calculator. There were no indoor air concerns identified under the most conservative residential use scenario. As mentioned, currently there are no groundwater exceedances.

Surface Soil/ Subsurface Soil: Confirmatory soil sampling to confirm closure in and Underground Storage Tank removal pit and two Areas of Concern were presented in the Final Act 2 Soil Closure Assessment submitted in December 2012. All VOC and SVOC sampling results were below the PADEP direct contact non-residential or soil-to-groundwater Act 2 non-residential, Statewide Health Standard Medium-Specific Concentrations. These standards are within the EPA’s Regional Screening Level risk range and satisfactorily demonstrate the soil is not contaminated above appropriately protective risk-based levels.

Surface Water: There are no surface water bodies at, within, or near the facility that have the potential to be contaminated from releases subject to RCRA Corrective Action.

Sediment: There is no sediment at, within, or near the facility that has the potential to be contaminated from releases subject to RCRA Corrective Action.

Air (outdoors): There is no reason to suspect outdoor air has been contaminated above appropriately protective risk-based levels from releases subject to RCRA Corrective Action.

Reference:

**First Quarter 2016 Groundwater Monitoring Report in Support of Act 2 Closure
Final Act 2 Soil Closure Assessment – December 2012**

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.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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:

Reference:

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

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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:

Reference:

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.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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.

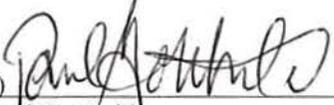
Rationale and Reference(s):

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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 (insert facility and EPA ID #), located at (insert address) 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: 5/26/16
(print) Kevin Bilash
(title) RCRA Project Manager

Supervisor (signature)  Date: 5-26-16
(print) Paul Gotthold
(title) Associate Director, Office of
Pennsylvania Remediation
(EPA Region or State) EPA Region III

Locations where References may be found:

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

Contact telephone numbers and e-mail

(name) Kevin Bilash
(phone #) 215.814.2796
(e-mail) bilash.kevin@epa.gov