

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: Envirite of Pennsylvania, Inc.  
Facility Address: 730 Vogelsong Road, York, PA 17404  
Facility EPA ID #: PAD 010154045

- I. 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?

X  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 Controls" 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"<sup>1</sup> 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	_____	<u>X</u>	_____	Strontium (slightly above tap water standard)
Air (indoors) <sup>2</sup>	_____	<u>X</u>	_____	_____
Surface Soil (e.g., <2 ft)	_____	<u>X</u>	_____	_____
Surface Water	_____	<u>X</u>	_____	_____
Sediment	_____	<u>X</u>	_____	_____
Subsurface Soil (e.g., >2 ft)	_____	<u>X</u>	_____	_____
Air (outdoors)	_____	<u>X</u>	_____	_____

- X If no (for all media) – skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient support 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):**

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**Background**

The Facility property consists of approximately 5.3 acres and is surrounded by light industrial and commercial establishments in a business park. The Facility had its start in 1980 under the ownership of Liqwacon. The name was changed to Envirite of Pennsylvania, Inc. in 1982.

EPA completed an EI site-visit at Envirite on July 12, 2016 in order to evaluate the current environmental conditions and potential exposure pathways at the Facility. EPA used the 1999 USCOE Environmental Assessment Report as a background document and evaluated all release and potential release pathways noted in the Report.

The Facility has primarily accepted waste materials which are inorganic and aqueous from industries such as electroplaters, steel producers, and metal manufacturers. In the unloading areas aqueous and semi-solid wastes are pumped to tanks or receiving pits in the fully-enclosed processing building. Wastes are analyzed for treatability and compatibility with other wastes and to determine the appropriate treatment process. Then they are neutralized and stabilized through oxidation, reduction, precipitation and filtration and treatment trains which also may include the addition of kiln dust and cement products for stabilization. Neutralized and stabilized wastes are tested to ensure they do not exhibit any hazardous characteristics and have immobilized any hazardous constituents. They are then

<sup>1</sup> "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).

<sup>2</sup> 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.

loaded onto trucks and sent off-site for disposal, and the effluent is discharged into the permitted process sewer system. In the event of a leak or spill, wastes are collected in segregated sump systems, analyzed and then processed in the applicable treatment area.

In November 1986, EPA approved a delisting petition for Envirite's treated metals-containing wastes. These treated wastes are no longer considered listed hazardous wastes, and may be disposed of in a non-hazardous waste landfill.

Groundwater

No known releases to groundwater have occurred.

Air (indoor and outdoor)

No known releases have occurred.

Soil (surface and subsurface)

In August 1985, it was discovered that a pin-hole leak had developed in the cast iron overflow line in the Acid Unloading Area collection trench. The overflow line was incorporated into the design of the trench to permit discharge of storm water during non-operating periods. A pin-hole leak had developed on the underside of the pipe and the release had flowed to a corrugated steel storm sewer inlet. The acidic material had deteriorated portions of the corrugated steel storm sewer and was released to underlying soil and into an adjoining storm sewer ditch. The release did not reach Willis run, a nearby surface water body.

The steel storm sewer was removed, as was the overflow line and the impacted soil beneath the storm sewer and in the adjacent storm sewer ditch. Soon after, the collection trenches in the unloading areas were completely redesigned to eliminate the overflow lines and the possibility of release into a storm sewer.

The Environmental Assessment Inspection Report by USCOE in 1999 noted some potential release areas to be further evaluated by EPA. These were the soil/grass areas adjacent to the transportation vehicle parking areas. USCOE noted visual evidence of the truck tires tracking solids materials from the load-out areas to the general parking areas. The report also noted the lack of curbing at the edges of the paved areas, and the potential of run-off of these solids materials to the soil/grass areas. The exact nature of these solids materials was not established. During the EI visit, EPA noted that the parking areas have been modified and expanded since the 1999 report. The paved areas are separated into smaller sloped areas with berms and sumps to catch run-off from each specific section. In addition, the entire perimeter of the paved areas is curbed. EPA has determined that this is not a potential pathway for releases to soils.

Surface Water and Sediment

No known releases have occurred.

**References:**

Environmental Assessment Inspection Report; USACE, dated April 5, 1999.

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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)

**"Contaminated Media"** Residents Workers Day-Care Construction Trespassers Recreation Food<sup>3</sup>

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):

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<sup>3</sup> 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"** (i.e., potentially<sup>4</sup> "unacceptable" levels) 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 cannot 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): \_\_\_\_\_

<sup>4</sup> 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 a "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 a "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 (and attach appropriate supporting documentation as well as a map of the facility):

X 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 Enviro of Pennsylvania, Inc. facility, EPA ID PAD 010154045, located at 730 Vogelsong Road, York, PA 17404 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) *Linda Matyskiela* Date 08/12/2016  
(print) Linda Matyskiela  
(title) Project Manager

Supervisor: (signature) *Paul Gotthold* Date 8/16/2016  
(print) Paul Gotthold, Associate Director  
(title) Office of PA 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

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**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.**