

**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 Baltimore  
**Facility Address:** 1448 DeSoto Road, Baltimore, MD 21230  
**Facility EPA ID #:** MDD 981 034 291

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**

The Safety-Kleen facility is located at 1448 Desoto Road in an industrial park in southwestern Baltimore, Maryland. Safety-Kleen leases its space from Merritt Properties, who owns the industrial park. The facility is surrounded by moderate industrial facilities, except for residential properties to the south. Interstate 95 runs approximately 400 feet to the northwest of the facility.

The facility began activities regulated under the Resource Conservation and Recovery Act (RCRA) in 1985, according to the February 28, 1985 Notification of Hazardous Waste Activity. According to the files at USEPA Region III and MDE offices, Safety-Kleen has been the only owner of the facility.

Activities at this facility include the leasing and servicing of Safety-Kleen parts cleaning equipment, mineral spirits, and immersion cleaner. In addition, Safety-Kleen sells perchloroethylene to dry cleaning establishments.

This facility operates as a storage and transfer facility that accepts and stores wastes generated by their clients, primarily engaged in the automotive, mechanical repair, and dry cleaning industries. The wastes are either maintained in storage units at the facility or transferred from truck to truck. Additionally, the facility generates hazardous wastes during drum cleaning. All hazardous wastes stored at the facility are eventually removed and taken to other Safety-Kleen treatment and recycling facilities. The facility uses three Aboveground Storage Tanks (ASTs); one is permitted to store parts washer solvents (hazardous waste), one stores parts washer solvent (product), and the third stores waste oil.

References Include:

Final RCRA Site Visit Report, Safety-Kleen Baltimore, EPA ID No. MDD 981 034 291 dated August 16, 2010.

**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 that 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		X		Current groundwater conditions are not known as no monitoring wells have been installed. However, the majority of the site is covered with asphalt and concrete and operations that take place outdoors are within secondary containment. If a release were to occur, it would most likely not reach groundwater. There are no documented releases to soil or groundwater. The site and surrounding areas are served by public water and sewer.
Air (indoors) <sup>2</sup>		X		No known releases or issues with indoor air.
Surface Soil (e.g., <2 ft)		X		Releases that occurred were not known to reach or affect surface soil.
Surface Water		X		Releases that occurred were not known to reach or affect surface water.
Sediment		X		Releases that occurred, respectively, were not known to reach or affect sediment.
Subsurf. Soil (e.g., >2 ft)		X		No known releases or issues with subsurface soil
Air (outdoors)		X		No known releases or issues outdoor.

- 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):

The majority of the site is covered with asphalt and concrete and operations that take place outdoors are within secondary containment. If a release were to occur, it would most likely not reach groundwater. All spills were cleaned up and were on paved surfaces. There are no documented releases to soil, surface water or groundwater. The site and surrounding areas are served by public water and sewer.

References Include:

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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)

<b><u>“Contaminated” Media</u></b>	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):

<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”**<sup>4</sup> (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):

<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 “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 Safety-Kleen Wheeling facility, EPA ID # WVD 981 034 101, located at 10 Industrial Park, Wheeling, WV 26003. Specifically, this determination indicates that the migration of "contaminated" groundwater is 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.

Historical investigations indicates all releases were on paved surfaces and cleanup up before they reached soil, groundwater or surface water. Per Final RCRA Site Visit Report, Safety-Kleen Baltimore, EPA ID No. MDD 981 034 291 dated August 16, 2010, drinking water is provided via a public drinking water source.

Completed by	<u>(signature) _____ -s- _____</u> <u>(print) _____</u> <u>(title) _____</u>	Date _____
Supervisor	<u>(signature) _____ -s- _____</u> <u>(print) _____</u> <u>(title) _____</u> <u>(EPA Region or State) _____</u>	Date <u>12/15/2011</u> _____

Locations where References may be found:

US EPA Region III  
Land and Chemicals Division  
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