

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 Corporation  
Facility Address: 1606 Pittsburgh Avenue, Erie, PA  
Facility EPA ID #: PAD 08 667 3407

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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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		
Air (indoors) <sup>2</sup>		x		
Surface Soil (e.g., <2 ft)		x		
Surface Water		x		
Sediment		x		
Subsurf. Soil (e.g., >2 ft)		x		
Air (outdoors)		x		

**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 and Reference(s):** EPA issued a “Corrective Action” permit to the Safety-Kleen Corporation, Erie, Pennsylvania facility on December 14, 1992. Based on the clean-up activities and subsequent facility investigation, EPA concluded that no further cleanup was required at the Facility. On May 3, 1998 the Hazardous and Solid Waste Amendments (HSWA) portion of the Resource Conservation and Recovery Act (RCRA) Permit (Permit) was terminated. The HSWA permit is no longer necessary to protect human health and the environment. The operational permit was issued to the Safety-Kleen Corporation by Pennsylvania Department of Environmental Protection (PADEP) on November 6, 1992; the expiration date is November 6, 2002.

Safety-Kleen operates a hazardous waste management facility on 3.83 acres located at 1606 Pittsburgh Avenue, Erie, Pennsylvania. The facility is located in an industrial area of Erie and has been operating since 1968. The Facility is an accumulation point for spent solvents generated by Safety-Kleen customers. The company’s customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. Wastes accepted on the site are spent mineral spirits solvent, immersion cleaner, waste resulting from dry cleaners, and paint wastes. All wastes are shipped to a Safety-Kleen recycling facility or a contract reclaimer and then may be returned to the company’s customers as a product.

The portion of the EPA Corrective Action Permit issued to the Safety-Kleen facility on December 14, 1992 required a RCRA Facility Investigation (RFI) for the soils and groundwater at certain units at the facility: the Return/Fill Receptacle and Emptying Area, and the Underground Tank Farm.

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In August of 1993, the Return/ Fill Area and the Underground Tank Farm were closed in accordance with an approved closure plan. In September of 1993 underground storage tanks were removed. According to soil sampling analytical results dated August of 1993, the concentration of total petroleum hydrocarbons (TPH) as diesel fuel in the soil borings ranged from less than 10 mg/kg to 350 mg/kg. TPH as lubricating oil was detected in all samples at concentrations between 44 mg/kg and 310 mg/kg. Discrete soil samples did not contain detectable concentrations of leachable metals. Composite samples from boring did contain detectable concentrations of leachable lead from 5.8 mg/l to 13 mg/l. However, lead and cadmium wastes were never handled at the facility.

On September 24, 1996, EPA issued a memorandum addressing "Coordination between RCRA Corrective Action and Closure and CERCLA Site Activities". In this document, EPA outlined its policy to avoid occurrences of redundant remediation projects between the RCRA and Superfund programs. In this case "cleanup under RCRA corrective action or CERCLA will substantively satisfy the requirements of both programs. In most situations ... the expectation that no further cleanup will be required under the deferring program. Similarly, a remedy that is acceptable under one program should be presumed to meet the standards of the other."

EPA believes the contamination resulting from the former underground storage tanks has been cleaned up and the Safety-Kleen facility has completed corrective action. No further action was recommended for the Safety-Kleen Service Center, Erie facility as of September 27, 1996.

Footnotes:

<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.

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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	---	---	---	---	NO	NO	---
Air (indoors)	---	---	---	NO	NO	NO	---
Soil (surface, e.g., <2 ft)	---	---	---	---	---	---	---
Surface Water	---	---	----	----	---	---	---
Sediment	---	---	NO	NO	---	---	---
Soil (subsurface e.g., >2 ft)	NO	NO	NO	---	NO	---	---
Air (outdoors)	---	---	---	---	---	NO	NO

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.

**Rationale and Reference(s):** See pages 2 and 3.

<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)?

**X** 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):** See pages 2 and 3.

<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):** See pages 2 and 3.

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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):

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 "Under Control" at the **Safety-Kleen Corporation, EPA ID # PAD 08 667 3407**, located at **1606 Pittsburgh Avenue, Erie, PA** 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: 07-02-02  
(print) Ioff, Victoria  
(title) Remedial Project Manager

Supervisor (signature) Date: 08-22-02  
(print) Gotthold, Paul  
(title) PA Operations Branch Chief  
(EPA Region or State) EPA, Region 3

**Locations where References may be found:**

1650 Arch Street, 3WC22  
RCRA EPA files.

**Telephone and e-mail numbers:**

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(phone #) 215-814-3415  
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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.**