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: Former Airco Welding Products
Facility Address: Route 616, P.O. Box 450, Rural Retreat, VA 24368
Facility EPA ID #: VAD 066 020 439

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 former Airco facility was located at Route 616 in Rural Retreat, VA 24368. This five acre site consists of a warehouse; asphalt parking; gravel driveways and parking; a concrete-paved truck loading area; and undeveloped grassy areas. A small stream and wetland areas transects the property to the south of the site building. Airco operated at the site from 1976 through 1982/1983 as a manufacturer of gas welding products. Airco's manufacturing process involved forging, machining, and drilling of copper material. Airco reportedly continued to lease the site for several years following vacating the facility. In 1985, Standard Motor Parts, subsequently EIS Brake Parts, leased the space and for refurbishing brake assemblies. Camrett Logistics leased the site between 1996 and 2006. During this timeframe, the building and land were sold. PAW Industrial Properties, LLC is the current owner of the property and leases part of the building as a distribution warehouse and office space.

Airco was identified as a large quantity generator (LQG) of hazardous waste under RCRA Regulations and operated as a hazardous waste management facility under interim status from November 19, 1980, until the plant closed operations in 1982/1983. Airco operated two SWMUs under interim status. The hazardous waste drum storage unit on an asphalt area just southwest of the building. Airco also operated a treatment tank that qualified as a totally enclosed elementary neutralization system which was later removed from the RCRA Part A Application.

Two fuel oil Underground Storage Tanks (USTs) are currently located at the site; one 2,000-gallon and one 3,000-gallon. The oil stored in these tanks was used for process equipment used by EIS brake parts, a Division of Standard Motor Parts, (who occupied the site from 1985 until 1996) and potentially by Airco as tank records indicate installation dates back to 1976. During a 2008 site visit, Camrett representatives indicated that they do not currently utilize the USTs and that the tanks containing heating oil. The tanks were scheduled for removal in February 2009.

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"**[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)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater		x		No known releases
Air (indoors) [2]		x		Airco is no longer operational at the site; facility currently operates as a distribution warehouse with no air emission sources
Surface Soil (e.g., <2 ft)		x		No known or suspected releases
Surface Water		x		Water body/creek in vicinity; no impacts expected based on former Airco operations
Sediment		x		Water body/creek in vicinity; no impacts expected based on former Airco operations
Subsurf. Soil (e.g., >2 ft)		x		No known or suspected releases
Air (outdoors)		x		Airco is no longer operational at the site; facility currently operates as a distribution warehouse with no air emission sources

☒ 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 former Airco Welding Products maintained a number of SWMUs. However, there is no history of releases at any of these units. In addition, the two regulated units at the site were clean closed in 1984. Therefore, groundwater, surface soil, and subsurface soil is not known or reasonably suspected to be contaminated above appropriately protective risk-based levels at the Airco Welding Products site. Similarly, there is no indication of releases that would have reached surface water or sediment in the vicinity of the site. As Airco is no longer operational at the facility and current operations at the site consist of a distribution warehouse, there is no indication of past or current air emissions that would negatively impact indoor and/or outdoor air quality.

The former Acid Room Used for the Steel Pasivating Operation (SWMU No. 1) was located in the interior of the main building and had a concrete floor. The operation was believed to involve treating steel in an acid and water rinse in order to maximize and enhance the corrosion resistant properties of the steel. Triangle Resource Industries (TRI) performed closure activities for this unit on February 23, February 25, and March 28, 1984. All exposed surfaces of the acid wash room were washed with a high pressure washer using a slightly caustic solution. No evidence of a spill or release was found during the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

SWMU No. 2, the Former Wastewater Treatment Facility for Acid Neutralization, was utilized for the treatment of acids that were used in the steel pasivating operation. During closure in 1984, waste materials generated in the acidic sludge pit were removed and the pit surfaces were power washed with a high pressure washer using a slightly caustic solution. All pit

wastes and rinse waters were containerized and transported offsite for treatment and/or disposal. No evidence of a spill or release was found during the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

Limited information was available in relation to the Former Degreasing Operation Area (SWMU No. 3) as well as the Former 55-Gallon Drum Storage Area (SWMU No. 4. According to the closure plan prepared for the facility, estimated waste storage at the time of closure included forty 55-gallon drums of sludge waste (28,000 lbs.); ten 55-gallon drums of waste lapping oil (6,000 lbs.) and ten 55-gallon drums of waste varsol (4,400 lbs.). No information relating to investigation or remediation of soils associated with either of these units was provided. No evidence of a spill or release was found during the site visit or in the files reviewed at the VDEQ or USEPA Region III offices.

Two USTs are currently located at the site; one 2,000-gallon and one 3,000-gallon. The USTs were reportedly used to store fuel oil for process equipment during EIS' and potentially Airco's occupancy. Information provided during the site visit indicates the tanks contain heating oil. According to the CA Final Site Visit Report, dated February 18, 2009, the two USTs were installed in 1976 and 1995, respectively, and were not registered with the Commonwealth of Virginia State Water Control Board (SWCB) or the VDEQ.) According to site representatives, these tanks were removed in February 2009 as new gas heaters have been installed.

The USTs at the facility that store petroleum products falls under the regulatory oversight of the VDEQ's Tank Program which regulates petroleum USTs under Article 9 and 10 of the Virginia State Water Control Law (SWCL). Virginia Regulations which regulate USTs fall under 9 VAC 25-580, Underground Storage Tanks: Technical Standards and Corrective Action Requirements. The above SWCL and applicable State Regulations enables the VDEQ to administer the petroleum UST federal law under RCRA Subtitle I. Therefore, any closure and/or corrective action associated with any release of petroleum products from the subject USTs will fall under the regulatory oversight of the VDEQ's Tank Program, which administers the requirements of RCRA Subtitle I in Virginia.

Furthermore, it should be noted that RCRA CA under Section 3008(h) is not applicable to petroleum USTs regulated under RCRA Subtitle I.

The VDEQ's Southwest Regional Office (SWRO) has been notified by e-mail correspondence, dated March 14, 2008, which documents the existence of the petroleum USTs at the facility and the pending closure of the tanks as noted in the below Final Site Visit Report (see below). The proper closure and any needed CA at the facility site regarding the USTs will fall under the regulatory oversight of the VDEQ's Tank Program in accordance with the applicable State Law and Regulations Federal Law, as noted above.

It should be noted that the town of Rural Retreat provides potable water supply and sanitary sewer service to the property and nearby properties.

In addition, it should be noted that no drinking water wells or groundwater monitoring wells exist at the site; therefore, groundwater quality is not known. However, the existence of potable water supply to the facility and surrounding area reduces the potential risk exposure to human health.

Any future closure and/or corrective action associated with any release of petroleum products from the subject USTs will fall under the regulatory oversight of the VDEQ's Tank Program, which requires closure and/or corrective action to address potential risk to human health and the environment.

For additional information see the February 18, 2009 Final Site Visit Report for the Former Airco Welding Products Facility.

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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[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 and Reference(s):

[3] 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"**[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):

[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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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 Former Airco Welding Products, EPA ID # VAD 066 020 439, Route 616, P.O. Box 450, Rural Retreat, VA 24368. 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.

Completed by (signature) SIGNED Date 3/17/09
Denis M. Zielinski
Senior RPM

Supervisor (signature) SIGNED Date 3/17/09
Luis Pizarro
Associate Director, Office of Remediation
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Locations where References may be found:

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