

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 - Silver Spring Service Center
Facility Address: 12164 Tech Road, Silver Spring, MD 20904
Facility EPA ID #: MDD 00 073 7395

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, GPRAs). 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)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	X			Total Petroleum Hydrocarbons as mineral spirits, VOCs
Air (indoors) ²		X		
Surface Soil (e.g., <2 ft)		X		
Surface Water		X		
Sediment		X		
Subsurf. Soil (e.g., >2 ft)	X			Total Petroleum Hydrocarbons as mineral spirits, VOCs
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.

X 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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The former Safety-Kleen (S-K) facility functioned as a storage and distribution center for clean and spent solvents, which were stored in separate 12,000-gallon underground storage tanks (USTs) on-site. The site has a history of numerous releases from the UST and loading/unloading operations area. S-K implemented various remedial activities at the time of the spills, which included containing the spills with sorbents and excavating impacted soil. Both tanks were removed in April 1996 when the site was completely decommissioned. Based upon field observations and soil samples taken from the excavation pit, residual groundwater and subsurface soil contamination was present, including total petroleum hydrocarbons (TPH) as mineral spirits and various volatile organic compounds (VOCs). Post-closure activities in the tank area were required by Maryland Department of the Environment (MDE), the state agency responsible for overseeing the closure process.

The following table compares groundwater sampling data collected by S-K showing levels above Maximum Contaminant Levels (MCLs) or Region 3 Risk Based Concentration (RBC) tapwater value from December 1996 and July 2001 (in µg/l or ppb) :

	<u>Max. Conc.(1996)</u>	<u>Max. Conc.(2001)</u>	<u>MCL</u>	<u>RBC</u>
TPH	15,710	6430	---	---
Benzene	13	ND	5	0.32
1,4-Dichlorobenzene	36	11.9	75	0.47
Tetrachloroethylene (PCE)	213	350	5	1.1
1,2-Dichloroethylene (1,2-DCE)	1090	41.6	70	55
1,1-Dichloroethylene	14	ND	7	0.044
Trichloroethylene (TCE)	29	10.3	5	1.6

(See the Post Closure Permit Application Remediation Work Plan (4/97) and Site Characterization Plan (3/97)) and Quarterly

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.

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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

<u>“Contaminated” Media</u>	Potential <u>Human Receptors</u> (Under Current Conditions)						Food ³
	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	
Groundwater	No	No	No	No			No
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)					No		No
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.

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):

Groundwater - Site and area drinking water provided by the city of Silver Spring.
 Subsurface soil - The driveway and parking areas above the contaminated area are asphalt paved, eliminating exposure to subsurface contamination.
 There are no day care centers on site and groundwater is not used for food production. Land use in the area is zoned industrial and the former service center was located in an industrial complex.

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

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 (and 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 Silver Spring** facility, EPA ID # **MDD 00 073 7395**, located at **12164 Tech Road, Silver Spring, MD** 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 05-16-02
 (print) Jennifer L. Shoemaker _____
 (title) Remedial Project Manager _____

Supervisor (signature) _____ Date 05-22-02
 (print) Robert E. Greaves _____
 (title) Chief, General Operations Branch _____
 (EPA Region or State) EPA Region 3 _____

Locations where References may be found:

U.S. EPA Region 3	Maryland Department of the Environment
WCMD General Operations Branch	Hazardous Waste Program
1650 Arch Street	2500 Broening Highway
Philadelphia, PA 19103	Baltimore, MD 21224

Contact telephone and e-mail numbers:

(name)	<u>Jennifer L. Shoemaker</u>	<u>Amin Yazdanian, MDE</u>
(phone #)	<u>215-814-2772</u>	<u>410-631-3400</u>
(e-mail)	<u>shoemaker.jennifer@epa.gov</u>	<u>ayazdanian@mde.state.md.us</u>

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.