

+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: Paramount Manufacturing LLC
Facility Address: 18259 Westinghouse Road, Abingdon, Virginia, 24210
Facility EPA ID #: VAD 000 619 734

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

Paramont is a polymer reaction injection molding facility that manufactures rubber and plastic molded products such as engine hoods and bumpers. Paramont purchased the Facility in 1999 and began operations in April 2001.

The Facility building is over 300,000 ft² in size and was constructed by Westinghouse in a manufacturing and residential area. Westinghouse, Electric Materials Division manufactured copper wire at the Facility until 1995/1996. The Facility was vacant from 1996 until 1999.

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).

Current Human Exposures Under Control**Environmental Indicator (EI) RCRIS code (CA725)**

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		Releases were remediated and units were clean closed under VDEQ.
Air (indoors) ²		X		No air permit is maintained for operations; no complaints found in files reviewed
Surface Soil (e.g., <2 ft)		X		Sampling results from the facility detected no hazardous materials exceeding the health based limits in the soil at the site.
Surface Water		X		No water body/creek in vicinity
Sediment		X		Sampling results from the facility detected no hazardous materials exceeding the health based limits in the soil at the site.
Subsurf. Soil (e.g., >2 ft)		X		Sampling results from the facility detected no hazardous materials exceeding the health based limits in the soil at the site.
Air (outdoors)		X		No activities take place outdoors; no complaints found in files reviewed

- 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 following SWMUs and AOCs were documented to have treated, stored or disposed of hazardous waste:

- SWMU No. 1 - Former Westinghouse - Animal Fat Wastewater Treatment Lagoon - This unit was used for treatment of various wastewaters generated at the facility including residue of animal fat which was used to lubricate wire during the copper wire extrusion and rolling processes. The wastewater lagoon was emptied and underwent closure under the supervision of VDEQ.
- SWMU No. 2 - Former Westinghouse - Raw Material Copper Storage Area - Westinghouse stored raw copper ingots in several large concrete pad storage areas outdoors. No releases have been documented from this SWMU.
- SWMU No. 10 - Former Westinghouse - PCB Contamination Area - Facility representatives indicated that Westinghouse had contaminated an area with PCBs leaking from lighting ballasts during their active time at

the facility. Sampling results from the facility from December 1998 detected no hazardous materials exceeding the health based limits in the soil at the site.

- SWMU No. 14 - Paramont - Raw Materials Storage Lube Pit with Sump- Paramont uses a Lube Pit with a sump to store raw materials. Four ASTs are utilized in the Lube Pit to store dicyclopentadiene and other raw materials used in the manufacturing process. A sump and an oil water separator (SWMU No. 15) are also located within this Lube Pit to manage wastes generated from this SWMU. This unit was used by Westinghouse for storage of raw materials used in their manufacturing process as well. No documented hazardous waste releases were associated with this SWMU.
- SWMU No. 15 - Paramont - Sump/Oil Water Separator - A Sump and an Oil Water Separator is located in the SWMU No. 14, Raw Materials Storage Lube Pit, and is used to collect waste fluids and condensate generated from the storage and process area equipment and to separate oil and water generated from this raw material process storage area. No documented hazardous waste releases were associated with this SWMU.
- AOC No. 1 - Paramont - Burned Pallets Area - Paramont used an area where wooden pallets were burned on-site away from the main facility building for fire training by the local fire department personnel. Reportedly, only water was used to control the fires at the fire training area located at AOC No. 1.
- AOC No. 2 - Westinghouse - Above Ground Petroleum Storage Tanks - Ten ASTs existed at the site, which were used for storage of petroleum, diesel, and kerosene to fuel an emergency generator. The ASTs were reportedly removed by Westinghouse in 1992. No documented hazardous waste releases were associated with this SWMU.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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)

<u>“Contaminated” Media</u>	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.)

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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.

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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):

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)**

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 Paramount Manufacturing LLC facility, EPA ID # VAD 000 169 734, located at 18259 Westinghouse Road, Abingdon, Virginia, 24210. 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) _____ -s- Date 7/29/10
(print) Denis Zielinski
(title) Senior RPM

Supervisor (signature) _____ -s- Date 8/2/10
(print) Luis Pizarro
(title) Associate Director
EPA Region III

Locations where References may be found:

US EPA Region III
Land & Chemicals Division
1650 Arch Street
Philadelphia, PA 19103

Contact telephone and e-mail numbers

(name) Denis M. Zielinski
(phone #) 215-814-3431
(e-mail) zielinski.denis@epa.gov