

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: Conversion Systems, Inc.
Facility Address: Stenton Avenue, Whitmarsh Township, Plymouth Meeting,
Pennsylvania
Facility EPA ID #: PAD 064361835

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?

 X 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 nonhuman (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Controls" 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)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale/Key Contaminants</u>
Groundwater	_____	X	_____	No sampling conducted
Air (indoors) ²	_____	X	_____	See rationale below
Surface Soil (e.g., <2 ft)	_____	X	_____	See rationale below.
Surface Water	_____	X	_____	See rationale below.
Sediment	_____	X	_____	See rationale below.
Subsurface Soil (e.g., >2 ft)	_____	X	_____	See rationale below.
Air (outdoors)	_____	X	_____	See rationale below.

 X If no (for all media) – skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient support 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):

In a 1990 report completed by NUS Corporation, the Conversion Systems Inc. building was identified as a 3,200 square foot building located on the Corson Lime Company property off Stenton Avenue in Whitemarsh Township, Montgomery County, Pennsylvania. The Site is located just south of the intersection of Stenton Avenue and Joshua Road and can be found on the United States Geological Survey (USGS) Germantown, Pennsylvania 7.5-minute Topographic Quadrangle at 75° 14' 30" north longitude and 40° 06' 29" west latitude. Conversion occupied/rented the Site building for a period of two years, from March 22, 1982, until March 3, 1984, and it was reportedly utilized for hazardous waste storage of materials in support of Conversion's Horsham, Pennsylvania Facility (PAD 064362940). Currently, neither of these Facilities exists under Conversion's operations. A letter from Corson Lime Company (parent tract) to Conversion, dated December 28, 1983, indicated that they wanted to terminate the lease to Conversion because they needed the building to be utilized as an electrical shop and for warehouse storage. The parent tract (former Corson Lime quarry) is currently identified as the Highway Materials Inc. Reclamation Project.

Wastes stored by Conversion at the Site included (but were not limited to) paint waste and industrial sludges. Wastes were reportedly stored in drums. Manufacturing by Conversion was not performed on Site. The wastes were received from the Conversion Horsham facility. The Horsham facility performed the hazardous waste research to determine

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.

potential uses and disposal methods for the hazardous waste.

Hazardous wastes were stored at the Site, under USEPA identification number PAD 064361835. Wastes stored at the Site included K053 through K069, K074, K075, K078 through K087, K089 through K092, F016, F017 and F018. NUS noted that at the time of the report in 1990, most of the wastes identified had been removed from the EPA list of RCRA hazardous wastes. A closure plan was initiated and submitted on January 11, 1984, to PADER and accepted on March 6, 1984. Closure was issued by PADER on August 15, 1984, and the hazardous waste Part B application returned on August 30, 1984.

A letter from USEPA to Conversion, dated August 28, 1990, indicated that based on information reviewed by USEPA about the closure of the facility, the USEPA recommended that no further action be taken. A letter from NUS to USEPA, dated September 27, 1990, indicated that based on the 1990 Environmental Priorities Initiative Preliminary Assessment Letter for the Site, NUS recommended that no further action be taken at the Site under CERCLA.

No spills have been reported at this site, and there appear to be no negative environmental impacts from Conversion's operations.

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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)

<u>"Contaminated Media"</u>	<u>Residents</u>	<u>Workers</u>	<u>Daycare</u>	<u>Construction</u>	<u>Trespassers</u>	<u>Recreation</u>	<u>Food</u> 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. Strikeout 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):

No rationale warranted.

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" (i.e., potentially⁴ "unacceptable" levels) 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):

No rationale warranted.

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 a "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 a "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.
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Rationale and Reference(s):

No rationale warranted.

Facility Name: Conversion Systems Inc.
EPA ID #: PAD 064361835
Location: Stenton Avenue, Whitemarsh Township, Pennsylvania

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