

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

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

**Current Human Exposures Under Control**

**Facility Name:** BTR Sealing Systems  
**Facility Address:** 3200 Main Street, Keokuk, IA 52632-8230  
**Facility EPA ID #:** IAD005136023

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 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)).

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**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).

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**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 [e.g., Maximum Contaminant Levels (MCLs), the maximum permissible level of a contaminant in water delivered to any user of a public water system under the Safe Drinking Water Act]) 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	<u><input checked="" type="checkbox"/></u>	<u><input type="checkbox"/></u>	<u><input type="checkbox"/></u>	<u>Groundwater is contaminated above Maximum Contaminant Levels (Drinking Water Standards) for several chlorinated and non-chlorinated Volatile Organic Compounds (VOCs).</u>
Air (indoors) <sup>2</sup>	<u><input type="checkbox"/></u>	<u><input checked="" type="checkbox"/></u>	<u><input type="checkbox"/></u>	Indoor air is not expected to be contaminated because the contaminant plumes are moving away from any existing structures, not allowing time for accumulation
Surface Soil (e.g., <2 ft)	<u><input type="checkbox"/></u>	<u><input checked="" type="checkbox"/></u>	<u><input type="checkbox"/></u>	Surface soils are not contaminated above applicable regulatory standards for several chlorinated and non-chlorinated Volatile Organic Compounds (VOCs) Note: All source area surface soils are paved over at the facility.
Surface Water	<u><input type="checkbox"/></u>	<u><input checked="" type="checkbox"/></u>	<u><input type="checkbox"/></u>	There is discharge into an onsite cooling pond, but sampling has not revealed contamination.
Sediment	<u><input type="checkbox"/></u>	<u><input checked="" type="checkbox"/></u>	<u><input type="checkbox"/></u>	Sampling of sediments in the cooling pond has shown no contamination.
Subsurf. Soil (e.g., >2 ft)	<u><input checked="" type="checkbox"/></u>	<u><input type="checkbox"/></u>	<u><input type="checkbox"/></u>	<u>Subsurface soils are contaminated above applicable regulatory standards for several chlorinated and non-chlorinated Volatile Organic Compounds (VOCs).</u>
Air (outdoors)	<u><input type="checkbox"/></u>	<u><input checked="" type="checkbox"/></u>	<u><input type="checkbox"/></u>	Volatile Organic Compounds could possibly transfer from groundwater to outdoor air. However, air standards are not expected to be

exceeded if this occurs, due to photo-oxidation of volatilized compounds

\_\_\_\_\_ 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):

The National Primary Drinking Water Regulations were used to evaluate groundwater. Contaminants found above regulatory levels were: Toluene (MCL = 1 mg/l), Xylene (MCL = 10 mg/l), Methylene Chloride (MCL = 0.005 mg/l), Ethylbenzene (MCL = 0.7 mg/l), PCE (MCL = 0.005 mg/l), TCE (MCL = 0.005 mg/l), 1,1,1 Trichloroethane (MCL = 0.2 mg/l), 1,1-Dichloroethene (MCL = 0.007 mg/l), cis 1,2-Dichloroethene (MCL = 0.07 mg/l), trans 1,2-Dichloroethene (MCL = 0.1 mg/l), Vinyl Chloride (MCL = 0.002 mg/l).

Surface, subsurface soils and sediments were evaluated using the EPA Region 9's Preliminary Remediation Goals (PRGs), which are risk-based concentrations derived from standardized equations, combining exposure information assumptions and EPA toxicity data. The key contaminants in surface and subsurface soils were Toluene (Industrial PRG = 520 mg/kg), Xylene (Industrial PRG = 210 mg/kg), Methylene Chloride (Industrial PRG = 21 mg/kg), Benzene (Industrial PRG = 1.5 mg/kg), Acetone (Industrial PRG = 6200 mg/kg), Ethylbenzene (Industrial PRG = 230 mg/kg), Methyl Ethyl Ketone (Industrial PRG = 28,000 mg/kg), PCE (Industrial PRG = 19 mg/kg), and TCE (Industrial PRG = 6.1 mg/kg).

References: Update of the Current Conditions Report, September 1999.

#### 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>“Contaminated” Media</b>	Residents	Workers	Day-Care	Constr.	Tresp.	Rec.	Food <sup>3</sup>
Groundwater	no	no	no	yes	no	no	no
Air (indoors)	___	___	___	___	___	___	___
Soil	___	___	___	___	___	___	___
(surface, e.g., ≤2 ft)	___	___	___	___	___	___	___
Surface Water	___	___	___	___	___	___	___
Sediment	___	___	___	___	___	___	___
Soil	no	no	no	yes	no	no	no
(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).

  X   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):

Workers sampling groundwater sampling events may be exposed to contamination if proper health and safety procedures are not followed. Construction workers could potentially be exposed to groundwater and surface and subsurface soils if any type of subsurface excavation was done on site. Exposure can be minimized by wearing protective gear.

<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):

Workers sampling for contaminated groundwater will be exposed to low concentrations for very brief times. Additionally, proper equipment is required to be worn during collection to limit exposures, if any. Construction workers will be forewarned about potential risks and will be expected to wear the proper equipment during any construction work.

<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):

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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 BTR Sealing Systems facility, EPA ID # IAD005136023, located at 3200 Main Street, Keokuk, IA, 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) _____	Original signed by	_____	Date	___3/6/00___
	(print) _____		Martin Kessler		
	(title) _____		Environmental Scientist		

Supervisor	(signature) _____	Original signed by	_____	Date	___3/13/00___
	(print) _____		William A. Pedicino		
	(title) _____		Chief, RCAP Branch		
	(EPA Region or State) _____		Region 7		

Locations where References may be found:

The referenced documents may be found in the EPA Region 7 Records Center at 901 N. 5<sup>th</sup> Street, Kansas City, Kansas

Contact telephone and e-mail numbers

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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.**