

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: Eaton Corporation
Facility Address: 4200 Highway 30 East, Kearney, NE
Facility EPA ID #: NED065133167

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, 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Groundwater impacted with TCE
Air (indoors) ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No residential buildings overlie plume
Surface Soil (e.g., <2 ft)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No impacts expected
Surface Water	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No impacts expected
Sediment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No impacts expected
Subsurf. Soil (e.g., >2 ft)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Suspected but not documented to still be present
Air (outdoors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No impacts expected

_____ 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): **A large trichloroethylene (TCE) plume originating at the facility extends over two miles off site with highest concentrations in excess of 800 µg/l (compared to a MCL of 5 µg/l). (An MCL is the maximum permissible level of a contaminant in water delivered to any user of a public water system under the Safe Drinking Water act.) A soil source is suspected to exist but has never been located despite several attempts. If a soil source continues to exist, as is likely, it is believed to lie under the footprint of the Eaton Corporation production building and is inaccessible. See *Groundwater Quality Survey (Phase 8) Report*, July 1998 and *Detailed Site Assessment Report for the Eaton Plant, Kearney, NE*, Dec 12, 1991.**

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.

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	no	yes	no	no			yes
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.

_____ 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): **Drinking water wells of residents in the Kearney area are screened in a deeper aquifer that is believed to be hydraulically separated from the overlying contaminant plume. As an added precaution, wells downgradient of the plume have been fitted with a carbon treatment unit that is changed regularly. There are no day-care facilities located in the area of the plume and the plume is too deep to represent a threat to construction workers. An irrigation well located within the contaminant plume is the only known potential exposure route for workers and via crops. See Removal Action Workplan, August 10, 1994.**

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)
Page 6

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 **Eaton Corporation** facility, EPA ID # **NED065133167**, located at **Kearney, NE** 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 07/27/00
(print) **William J. Johnson**
(title) **Geologist**

Supervisor (signature) original signed by _____ Date 08/04/00
(print) **John Smith**
(title) **Chief, RCRA Corrective Action and Permits Branch**
(EPA Region or State) **EPA Region VII**

Locations where References may be found:

EPA Region VII, RCRA Records Center
901 N. 5th Street
Kansas City, KS 66101

Contact telephone and e-mail numbers

(name) **Jeff Johnson**
(phone #) **(913) 551-7849**
(e-mail) **johnson.jeff@epa.gov**

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.