DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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

Current Human Exposures Under Control

Facility Name:	Mine Safety Appliances Company
Facility Address:	Mars Evans City Road, Evans City, Pa
Facility EPA ID #:	PAD# 004 322 913

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 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).

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)?

	Yes	No	?	Rationale/Key Contaminants
Groundwater	X			VOCs and semi-VOC detections in groundwater.
Air (indoors)		X		The majority of the isolated pockets of VOCs and semi-VOCs plumes are beneath open areas and not under buildings. Levels of VOCs detected in groundwater do not pose a vapor intrusion problem. The facility monitors indoor air quality.
Surface Soil (e.g., <2 ft)		X		Contaminated soil excavated.
Surface Water		X		Recent sampling indicates low or non-detect levels of constituents of concerns.
Sediment		X		Recent sampling indicates low or non-detect levels of constituents of concerns.
Subsurface Soil (e.g., >2 ft)	X			Remanence of VOCs were detected in subsurface soil.
Air (outdoors)[2]		X		Emissions equipment installed.

	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.
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):

Operational modifications, regulatory management, and/or remediation/closure of the small and large landfills, various treatment areas, the Areas of Concern (AOCs), Solid Waste Management Units (SWMUs), and process storage areas were implemented to address suspected or known impacts of contamination to environmental media. Many of these actions are recent or on-going.

According to facility representatives, some residents in Callery obtain drinking water from private wells. Some residential areas in Evans City (specifically to the north of the facility) receive municipal water. Drinking water and process water for MSA use is supplied by the municipal system (Draft Phase II RCRA Facility Assessment). Earth Sciences conducted a field reconnaissance to verify the presence of domestic water supplies and extent of municipal water service. No

[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.

Rationale/Reference(s) (continued)

downgradient groundwater users were identified within on mile of the facility (Groundwater Quality Assessment (GWQA) Report, July 9, 1990).

Reportable releases to facility surfaces, other than containment areas (i.e., soils, pavement, floors), the Breakneck Creek, and air have occurred at the facility and are detailed on Enclosure 2 provided by MSA in the EI Report. Process or operational modifications, training, or repairs are generally the action taken to prevent reoccurrence (Enclosure 2, Reportable Spills and Releases, provided by MSA found in the EI Report). Seven AOCs and 66 SWMUs exist at the facility. The information provided below indicates which AOCs, SWMUs, and other areas of potential environmental impacts have been addressed by MSA according to the documentation reviewed in the USEPA Region III and the PADEP Northwest Regional office files.

Several residual and hazardous waste treatment activities are covered by permit-by-rule (PBR). These include: empty cylinder cleaning (B86, residual waste); wastewater pretreatment (WWPF, residual waste); treatment of waste in containers in a Containment Building (Hood 2, hazardous waste), treatment of waste in containers (Hood 1B, hazardous waste); ENU (WWPF, hazardous waste; treatment of hazardous waste in containers and a tank (B24, hazardous waste); treatment of hazardous waste in containers (B34, hazardous waste).

A list of generated wastes is found on the table titled "Waste Accumulation" provided by MSA. Waste Accumulation and Satellite Waste Accumulation Areas is given on the table titled "Waste Accumulation Areas" provided by MSA. A detailed description of process materials and facility wastes and the waste management areas are found in the Draft Phase II RCRA Facility Assessment.

Plant wastewater and sanitary wastes flow to the plant's WWPF, after which they are discharged to the Evans City Publicly Owned Treatment Works (POTW), under an indirect discharge service agreement. Water routed to the WWPF also includes a small flow from an operation subject to the small-sized rubber molding categorical pretreatment standards.

AOC A-Fuel Oil Underground Storage Tanks (USTs)
Nine fuel oil USTs were known to exist at the facility. UST Nos. 1, 4, and 9 were removed. Fuel oil USTs Nos. 2, 3, 5, 6, 7, and 8 were closed in place. Refer to Table IV-3 in the Draft Phase II RCRA Facility Assessment.

AOC B- Gasoline USTs
Four gasoline USTs were known to exist at the facility. Gasoline USTs Nos. 1, 3, and 4 were removed. The status of UST No. 2 is unknown, but it believed that the tank was possibly removed before reporting was mandated. Refer to Table IV-4 in the Draft Phase II RCRA Facility Assessment.

AOC C-Underground Pentane Tanks and Acetone UST
This AOC consisted of two semi-buried product tanks that were used for the storage of pentane. The tanks were installed in 1977, at the start of the nHC operations and were removed in August 1993. The acetone UST is registered with the State of Pennsylvania.

AOC D- Aboveground nHC Tanks
This unit consists of two aboveground product tanks that were used for storage of methanol and toluene at the nHC facility. The tanks were installed in 1977, and inspected in August of 1993. They appeared to be empty and in good condition.

A closure plan for the Hazardous Waste Feed UST (SWMW 40) was submitted to PADEP in October 1990. The Draft Phase II RCRA Facility Assessment states that the Hazardous Waste Feed UST and the Aqueous Waste Tank (SWMU 41) were removed during August 1993. Both these tanks were associated with the nHC Plant.

AOC E- MSA Spill Report Incidents
This unit consists of nine spills which were reported to PADEP (PADER) by MSA. Many of these spills can be traced to SWMUs, however, in some cases the exact cause of the release cannot be proven. The spill dates, quantities, any sampling performed, and constituents are summarized in the EI report.

Rationale/Reference(s) (continued)

AOC F-1981 Fuel Oil Leak
In September 1981, approximately 12,000 gallons of fuel oil were released from a UST located along the western boarder of the manufacturing portion of the facility. The oil migrated through the subsurface soils to the Breakneck Creek. A boom was installed and a trench was dug adjacent to the creek to capture the released oil. An estimated 5,800 gallons of fuel oil were recovered. The release affected approximately 200 feet of the creek bank and two miles of Breakneck Creek. The UST was removed and the excavated area was flushed with water. A PADEP representative performed an inspection of the leak and associated clean-up operations on October 7, 1981. The PADEP inspection report indicates that the clean up was "satisfactory".

Storage Area No. 1 (SWMU 49)-PADEP issued an official notice that the area was closed in compliance with regulations on November 25, 1985.

Storage Area No.2 (SWMU 13)- This area operated under PADEP permit as a Hazardous Waste Container Facility. The area comprised of two former adjacent storage areas, old unit (89) and new unit (89A). Both units were clean closed between June and September 2002 under PADEP.

Storage Area No.3–(SWMU 50)- PADEP issued an official notice that the area was closed in compliance with regulations on November 25, 1985.

Storage Area No.4–USEPA instructed MSA in its 1989 Consent Decree to delete Storage Area No.4 from the RCRA permit application.

Storage Area No.5- USEPA instructed MSA in its 1989 Consent Decree to delete Storage Area No.5 from the RCRA permit application

Storage Area No.6- USEPA instructed MSA in its 1989 Consent Decree to delete Storage Area No.6 from the RCRA permit application.

Storage Area No.7- USEPA instructed MSA in its 1989 Consent Decree to delete Storage Area No.7 from the RCRA permit application.

Customer-Returned Drum Storage Area (SWMU 53)- On December 8, 1988, PADEP issued a letter declaring the area to be clean closed.

Treatment Unit 1A, Hood A (SWMU 1)- PADEP issued a letter on August 14, 2001 stating that MSA has met the PADEP requirements for a clean closure of Treatment Area 1A.

Treatment Unit 1B, Hood B (SWMU 2)- Continues to operate as a permit-by-rule treatment container 1997. Characterization data for soil or fill beneath or adjacent the structure were included in the June 22, 2001 Closure Certification Report.

Treatment Area 2- USEPA instructed MSA in its 1989 Consent Decree to delete Treatment Area 2 from the permit application.

Treatment Unit No. 3 (SWMU 47)- Closed in accordance with PADEP's regulations in December 1988. USEPA instructed MSA in its 1989 Consent Decree to delete Treatment Area 3 from the RCRA permit application.

Treatment Area No. 4 (SWMU 48)- PADEP issued a letter on August 14, 2001 stating that MSA has met the PADEP requirements for a clean closure of Treatment Area 4.

Thermal Treatment Unit (SWMU 59)- PADEP issued MSA an official notice that the Thermal Treatment Unit was closed in compliance with the regulations on November 25, 1985.

Rationale/Reference(s) (continued)

Waste Pile No. 1 (SWMU 54)- As part of its 1989 Consent Decree, USEPA instructed MSA to delete Waste Pile No. 1 from its RCRA permit application.

Waste Pile No. 2 (SWMU 55)- As part of its 1989 Consent Decree, USEPA instructed MSA to delete Waste Pile No. 2 from its RCRA permit application.

Former Small Landfill (SWMU 58)- Managed shells and casings containing explosive materials. Closed in accordance with PADEP's regulations in October 1983.

The Former Large Landfill (SWMU 57)- The former landfill was a pre-RCRA unit. This landfill managed incinerator ash, municipal-type waste, and other non-chemical materials. The Former Large Landfill has since been closed and is currently covered by vegetation and soil. The area is normally open space but is occasionally used as an field to dock or store construction equipment and materials.

Acid Impoundment (SWMU 26)- In October 1990, PADEP determined that MSA had clean closed the Acid Impoundment as per the approved closure plan.

Caustic Impoundment (SWMU 27)- In December 1992, PADEP determined that MSA had clean closed the Caustic Impoundment as per the approved closure plan.

nHC Plant
The nHC Plant was not specifically addressed in the RCRA Permit. The nHC property housed operations to produce a liquid component that was used by others to produce solid fuel propellant. The buildings were owned by the U.S. Department of Defense, Department of the Army. MSA owned the land and Callery (division of MSA) managed the production of the liquid component.

Weston collected groundwater samples from wells in the vicinity of the nHC Plant in December 1980. Analysis for oil and grease, toluene, acetone, methanol, and pentane indicated that each compound was below applicable detection limits (Draft Phase II RCRA Facility Assessment).

Former Wastewater Surface Impoundments and WWPF
Assessment activities regarding the former wastewater surface impoundments were conducted from January 1989 through June 1990 and are described in a technical report entitled "Groundwater Quality Assessment (GWQA) Report, Evans City Plant", dated July 9, 1990. This report identified groundwater contaminants and their potential sources, verified that there are no downgradient groundwater users, and recommended that the groundwater-monitoring program be modified. The GWQA Report concluded that the WWPF had impacted the shallow aquifer beneath and adjacent to the WWPF. Parameters showing the greatest impact included chloride, sulfate, sodium, calcium, and potassium. In addition, certain volatile organic compounds (VOCs) were detected in three monitoring wells located near the WWPF pipe bridge. These VOCs included 1,1,1-trichloroethane (TCA) and 1,1-dichloroethane (DCA).

Several significant changes have occurred at the facility subsequent to submission of the July 9, 1990 GWQA report. These changes include (1) clean-closure of the former acid wastewater surface impoundment, (2) installation of a 100,000 gallon wastewater equalization tank, (3) elimination of the plant's NPDES-regulated wastewater discharge to Breakneck Creek, (4) clean-closure of the former caustic wastewater surface impoundment, (5) installation of a 135,000 gallon equalization tank and a lamella clarifier, and (6) clean closure of the remaining two pretreated wastewater settling impoundments.

Groundwater monitoring has been conducted at the facility since April 1987. Groundwater samples were collected on a monthly basis from April through August 1987 and on a quarterly basis from August 1987 to the present. The data report of September 17, 1999 (contained in the package dated March 26, 2001) indicates that the most current VOC data collected July 20, 1999 shows elevated levels of 1,1 DCA (22 ug/l) and 1,1 DCE (9.6 ug/l) in Well P-107.

According to CME reports (dated August 17, 1995) and data from MSA's current environmental consultant, C.D. Tower and Associates, Inc. (CDTI), the rate and extent of contaminant groundwater migration is negligible. The process of

Rationale/Reference(s) (continued)

closing these settling impoundments resulted in the general containment of the contaminated groundwater. Prior to their installation and in the period of their operation, a natural bedrock mound existed underneath the impoundment location. This caused a mounded groundwater condition with radially outward groundwater flow from the center of the impoundment area. In the process of closing these areas, the site was leveled and the potential groundwater recharge source was eliminated. This resulted in a nearly flat water table with a low gradient.

Closure of the former acid and caustic wastewater surface impoundments and routing plant wastewaters to the two aboveground equalization tanks have effectively prevented spills or releases of wastewater constituents from reaching site groundwater or environmental media. The WWPF currently discharges to the Evans City Borough's POTW and effectively prevents releases to surface water and further lessens potential impact to site groundwater.

Groundwater Control Project

MSA has been routinely meeting with PADEP to discuss a voluntary Groundwater Control (GWC) Project being conducted at the northern end of the site (associated with Building 21 and Outfalls 009). This work is thoroughly discussed in a report recently issued entitled "Interim Technical Summary, Groundwater Control Project" (11/28/01). The currently active project is focused on 1) defining physical characteristics of subsurface features that control or influence groundwater, 2) identifying potential subsurface contaminants and delineating their lateral and vertical extent, 3) evaluating potential longer-term remedies, and 4) implementing and documenting the selected remedy.

CDTI states in the Interim Technical Summary that based on review of available data for the northern part of the facility that "it is apparent that MSA has adequately addressed impacted soil, former SWMUs, and any other continuing sources that were

uncovered or disturbed in the B21 and 009 areas". The Interim Technical Summary documents that excavation, removal, and off site disposal of impacted soil, sludge, and debris was completed in both the B21 and 009 areas. Verification sampling was conducted after the removal of contaminated materials was completed. Consequently, based on remedial efforts and review of the data included in the data Interim Technical Summary, additional soil characterization or remediation is not planned for the continuing GWC Project.

The GWC Project consists of pumping groundwater from the coal/void system and treating it prior to discharge to the Evans City POTW. The Interim Technical Summary states that there is a positive correlation between the pumping activity and a greatly reduced flow at Pipe 026. Pipe 026 is the discharge point for the coal/void groundwater from the B21 area. Pipe 026 discharges up-slope, but adjacent to the Breakneck Creek. Pumping has also appeared to decrease the concentrations of 1,1,1-trichloroethane (TCA). TCA has been identified as the key contaminant of interest in area B21. Similar pumping of the 009 area has decreased bank seepage to the north, as it has not been noted since the start of pumping. The Interim Technical Summary states "that it appears that the existing groundwater pumping is affecting groundwater flow beneath the northern part of the plant, effectively controlling the groundwater migration of contaminants." Groundwater monitoring has been conducted in the B21 and 009 areas since 1998. Planned GWC activities will continue to monitor the effectiveness of these controls.

Characterization or remedial efforts have been conducted at other key units in the GWC Project area. A description of the status of the Former Treatment Area 1A, Treatment Area B, Former Treatment Area #4, and the Large Landfill are discussed below. As a result of operational changes and remedial activities at the WWPF, groundwater quality-related aspects have been addressed by eliminating most potential sources of groundwater contamination in the vicinity of the WWPF. However, the historical impacts from these units to the environment are not fully known. The status of these areas is described below.

Salt Bins

The salt storage bins store the by-product salt (primarily sodium chloride) from the potassium metal manufacturing operation. Run-off from the salt bins is routed via a trench drain to the facility sanitary sewer. Soil characterization data for soil or fill beneath these structures were included in the June 22, 2001 Closure Certification Report.

Rationale/Reference(s) (continued)

Former Cooling Water Pond (Pond No. 3)

The pond was constructed as an unlined impoundment that received influent wastewater from facility operations along with stormwater run-off. The pond was clean closed by MSA in October 1994 by removing accumulated sludge, sediment, and soil, and then back-filling the site with clean fill. A standpipe was installed as a temporary dewatering point at this time.

Former Pond No. 1 and 2

Former Pond No. 1 consisted of an approximately 100 foot by 100 unlined earthen basin which received acidic wastewater and sanitary wastewater. Former Pond No 1 was located northeast of B38. An electrical substation now covers the area. Former Pond No. 2 was a similar structure, which received acid and caustic wastewater from facility operations. Former Pond No. 2 was located north of B38. The nature of the closure of these two ponds is unknown, although MSA has a decommissioning procedure on file that was to address pond closure in the late 1970's. As evidenced by recent excavations north of B38, it is likely that some lime-neutralized sludge remains at the former Pond No. 2 location.

Former Pond No. 4

Pond No. 4 was located on the east bank of the Breakneck Creek and south of B20. Former Pond No. 4 consisted of an approximately 100-foot diameter unlined earthen basin, which apparently received caustic waster water and likely, sanitary wastewater. Former Pond No. 4 was presumably closed in a similar manner to Ponds No. 1 and 2. As much as a 20-foot thickness of fill may have been placed within Former Pond No. 4 to bring the area up to grade of the adjacent buildings and roads. The area is now covered with vegetation and soil, a building, or asphalt.

Surface water and sediment sampling were conducted at Breakneck Creek on January 23, 3002. A total of 6 sets of surface water and sediments samples were collected upstream and downstream of the facility for VOCs and semi-VOCs. Analytical results indicate non-detects for both the surface water and sediment samples. *(Environmental Indicator Report Additional Data, 3/2002)*

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	no	no	no			no
~~Air (indoors)~~							
~~Soil (surface, e.g., <2 ft)~~							
~~Surface Water~~							
~~Sediment~~							
Soil (subsurface e.g., >2 ft)	no	no		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):

Assessment activities regarding the former wastewater surface impoundments were conducted from January 1989 through June 1990 and are described in a the technical report entitled "Groundwater Quality Assessment (GWQA) Report, Evans City Plant", date July 9, 1990. The report identified groundwater contaminants and potential sources. Moreover, there are no downgradient groundwater receptors within a mile from the facility. Drinking water and process water for MSA use is supplied by the municipal system Historical data indicate that the groundwater plume(s) is contained within the facility property lines.

Subsurface soil contamination is capped either with asphalt or is beneath manufacturing buildings. Therefore, exposure to contaminated subsurface soil is unlikely. In addition, the contaminated soil is located at a depth that would not ordinarily be encountered by construction workers.

[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"** (i.e., potentially[4] " 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):

[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.

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.

Rationale and Reference(s):

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):

X 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 Mine Safety Appliance Company facility, EPA ID PAD 004 322 913 located at Mars Evans City Road, Evans City, PA 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) Sigma Toth Date July 2002

(print) Sigma Toth

(title) Solid Waste Supervisor

Supervisor: (signature) Paul Gotthold Date Oct 16, 2002

(print) Paul Gotthold

(title) Chief, PA Operations

(EPA Region or State) EPA

Locations where References may be found:

References have been appended to the Environmental Indicator Report and can be found at PADEP's Northwest Regional Office and USEPA's Region III Office

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.

Facility Name: Mine Safety Appliance Company
EPA ID #: PAD 004 322 913
City/State: Evans City, Pennsylvania

CURRENT HUMAN EXPOSURES UNDER CONTROL (CA 725)