

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
Current Human Exposures Under Control

Facility Name: Clifton Precision North
Facility Address: Marple and Broadway Avenues, Clifton Heights, PA
Facility EPA ID #: PAD 013 975 495

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 #8 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		X		See rational, below
Air (indoors) ²		X		“
Surface Soil (e.g., <2 ft)		X		“
Surface Water		X		“
Sediment		X		“
Subsurf. Soil (e.g., >2 ft)		X		“
Air (outdoors)		X		“

- 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 Facility operated from 1955 until 1994 as an electrical components manufacturer. All waste, equipment, and storage containers were removed from the Facility between July 1993 and August 1994. PADEP conducted hazardous waste inspections from 1982 until 1996. EPA conducted an Environmental Priorities Initiative inspection and assessment in 1990. PADEP conducted an Environmental Indicators inspection and assessment in 2007.

The Facility managed solvent and electroplating treatment waste. Waste materials were stored in detached structures. The structures were removed when the Facility was closed. Facility documents, including inspection reports, identify no releases or spills at the facility.

Groundwater – No groundwater data is available. No wells exist on the Facility or on nearby properties. Groundwater was not encountered during the excavation of a fuel oil tank that was removed in 1994 (12 foot deep excavation). The expected direction of groundwater flow is to the east, toward Darby Creek and Cobbs Creek. Flow direction is based on topographical observations and the role of streams as discharge points for groundwater.

Properties within a 3-mile radius use public water supplies as a potable water source, with the exception of one residential well. The residential well is located adjacent to Darby Creek, approximately ½ mile from the Facility. The well is located upstream of the Facility and hydraulically upgradient of the expected direction of groundwater flow. Although there is no evidence or reports of releases of contaminants from the facility, and the residential well is located upgradient of the Facility, several attempts were made to sample the well water as a precautionary measure. The resident/property owner did not provide permission to sample the well water.

Air (indoors and outdoors) – The Facility ceased operations in 1994. No Facility activities required an air permit. All waste was removed from the property in 1994. Facility documents, including inspection reports, identify no releases or spills at the facility that might continue to release contaminants into the air.

Surface Water and Sediment – The Facility is located approximately 1/8 mile from Darby Creek. During the Facility operations, waste and stormwater discharged to the municipal sewer system. Facility documents, including inspection reports, identify no releases or spills at the facility.

Surface Soil and Subsurface Soil – Limited soil data is available. Soil samples were collected during the removal of a fuel oil tank in 1993. All results (DRO analytes) were below screening levels. PADEP approved the tank closure report in 1994, with “No Further Action” required.

References

- *Environmental Indicators Inspection Report, Clifton Precision (also known as Litton Corporation and Capp Real Estate)*, prepared for PA Department of Environmental Protection, Harrisburg, PA, October 2007, URS
- *Environmental Priorities Initiative Preliminary Assessment of Litton Systems, Incorporated*, prepared for the Hazardous Site Control Division, US Environmental Protection Agency, 7/10/90, NUS Corporation
- *PADER UST Closure Report Form, Clifton Precision North, 4/7/94*, BCM Engineers Inc.
- PADER hazardous waste inspection reports, 1982 through 1996

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).

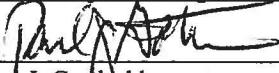
² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged 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.

**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 **Clifton Precision North** facility, EPA ID # **PAD 013 975 495**, located at **Marple Ave and Broadway Ave, Clifton Heights, 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)  Date 1-25-11
(print) Maureen Essenthier
(title) RCRA Project Manager

Supervisor (signature)  Date 1-26-11
(print) Paul J. Gotthold
(title) Associate Director, Land and Chemicals Division
EPA, Region III

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