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

Facility Name: Beaver Paint Company
Facility Address: 710 Beaver Road, Girard, PA 16417
Facility EPA ID #: PAD 00 502 8832

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 #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).

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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)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater		X		No detections
Air (indoors)[2]		X		No record of contamination
Surface Soil (e.g., <2 ft)		X		No detections.
Surface Water		X		None on Facility
Sediment		X		None on Facility
Subsurf. Soil (e.g., >2 ft)		X		No detections
Air (outdoors)		X		No record of contamination

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:

Beaver Paint was a manufacturer of finished industrial paint coatings, located on one acre of land in Erie County, Girard, PA. The site is bordered to the north by Beaver Road, to the east and west by wooded areas, and to the south by two houses. This facility was used for manufacturing activities such as paint mixing, product drumming, and laboratory testing.

The site layout consisted of a main building, a raw material warehouse, and a parking area. A recessed loading dock was located between the two buildings on site where several cleaned and empty 55-gallon drums were, at times, stored on asphalt. Six solid waste management units (SWMUs) were identified for the site: the mill room waste collection drum, the fill-off room waste collection drum, the laboratory mill room waste collection drum, the waste drum storage area in the warehouse, the empty drum storage area, and the outside trash container. Equipment-cleaning operations produced spent solvent wastes, which were temporarily stored until they were transported to treatment facilities.

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[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.

Records indicate hazardous waste inspections occurred between 1983 and 2003, when the facility operations, as described above, closed. During operations of the facility, no spills or releases of waste were recorded or documented.

An investigation at the site was conducted in 2003 by Moody& Associates. Groundwater and soil samples were analyzed for site-related constituents; organic compounds and PCBs. No constituents were detected in either the groundwater or soil samples.

Joseph P. Walton owned Walton Paint Company, which did business as Beaver Paint Company. In 2002, Beaver Paint operations ceased in Girard, PA and the liquid paint operations moved to Jamestown, PA with the Jamestown Paint Company (108 Main Street, Jamestown, PA 16139), also under the same ownership. Jamestown Powder Coatings was purchased in 2002, by J.P. and Mike Walton as a sister company of Jamestown Paint Company, to conduct operations at the former Beaver Paint facility.

The Girard, PA facility remained vacant for a few years during the building transformation to accommodate powder coating operations. Facility operations officially began in November 2005. The main building, raw material warehouse, loading dock and parking area are still present.

Unlike Beaver Paint Company, Jamestown Powder Coatings utilizes powder products instead of liquids. Thus, the facility does not generate any hazardous or toxic waste and subsequently does not have the need for a USEPA ID Number. PAD005028832 is still associated with the facility. However, as confirmed by PADEP Northwest Regional Office, the number is inactive and no hazardous waste is currently being generated following the facility's conversion to a powder coating operation. The only SWMU that remains on site is the outside trash container.

As discussed above, during the operational life of the Beaver Paint facility, no spills or releases of waste were recorded or documented. No constituents were detected in the environmental investigation performed at the Facility. Additional, with the Facility's current operational model, no contamination of environmental media is expected.

References

Phase II Subsurface Investigation and Environmental Site Assessment, Moody, December 2003
Final Environmental Indicator Inspection Report for Beaver Paint Company, Baker, October 2007

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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)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater							
Air (indoors)							
Surface Soil (e.g., <2 ft)							
Surface Water							
Sediment							
Subsurf. Soil (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.

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):
See above

[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"**[4] (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)?

☐ If no (exposures cannot 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.

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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 (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 Jamestown Powder Coatings facility (former Beaver Paint Company), EPA ID # PAD00 502 8832, located at 710 Beaver Road, Girard, PA 16417 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) Linda Matyskiela Date 08/30/2018
(print) Linda Matyskiela
(title) EPA Project Manager

Supervisor (signature) Paul Gotthold Date 8-31-2018
(print) Paul Gotthold, Associate Director
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