Documentation of Environmental Indicator Determination
Interim Final 2/5/99
RCRA Corrective Action
Environmental Indicator (EI) RCRA Info code (CA725)
Current Human Exposures Under Control

Facility Name: L.E. Hutchens Inc.
Facility Address: 22 Performance Drive, Stuart, VA 24171
Facility EPA ID #: VAD981105521

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 RCRA Info as long as they remain true (i.e., in RCRA Info status codes must be changed when the regulatory authorities become aware of contrary information).

Current Human Exposures Under Control
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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	___	✓	___	_____
Air (indoors)[2]	___	✓	___	_____
Surface Soil (<2 ft)	___	✓	___	_____
Surface Water	___	✓	___	_____
Sediment	___	✓	___	_____
Subsurf. Soil (>2 ft)	___	✓	___	_____
Air (outdoors)	___	✓	___	_____

✓ 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):
See attached page

RCRA Site Visit Report, December 29, 2006
Environmental Priorities Initiative Preliminary Assessment of L.E. Hutchens, Inc., September 18, 1991
Closure Certification – Hazardous Waste Storage Units, October 19, 1988
VDEQ project files

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.

Site Description:

L. E. Hutchens, Inc. (Hutchens) was founded as a home heating oil provider in 1975. The Hutchens facility is located on a 4 acre site in the Patrick County Industrial Park in Stuart, VA. Hutchens is currently a local marketer for gasoline, diesel, and petroleum products to central-southwest Virginia and the Piedmont area of North Carolina.

Hutchens provided portable solvent cleaning stations to automotive and industrial clients from approximately September 1986 until October 7, 1987. The solvents used in the cleaning stations contained a mixture of aliphatic and aromatic hydrocarbons with synonyms White Spirits, Varnoline, and Naphtha Safety Solvent. Spent cleaning station solvents were unlisted but exhibited the characteristic of ignitability. The Hutchens facility was listed as a Large Quantity Generator of D001, waste ignitable liquids, until 1987, when Hutchens contracted the parts washing business to Safety Kleen to avoid being listed as a Large Quantity Generator.

Hutchens maintains a current Integrated Contingency Plan which includes an Environmental Management Plan and Spill Prevention Control and Countermeasures (SPCC) Plan that documents the procedures for addressing spills and preventing releases to local surface waters.

The RCRA Site Visit Report dated December 29, 2006, indicated hazardous waste management units (HWMUs), solid waste management units (SWMUs) and areas of concern (AOCs) at the facility site. All the SWMUs, and AOCs listed in the RCRA Site Visit Report with the exception of SWMU-1, Former Tank and Containment Dike, (a former HWMU), are currently regulated as above ground petroleum storage tanks (ASTs) under 40 CFR 112.

SWMU-1 consists of a former hazardous waste tank farm with adjacent pump station which contained two (2) 12,000gallon tanks for reclaimed solvent and a 10,000 gallon tank for virgin solvent. The hazardous waste ASTs were located on a concrete pad surrounded by an earthen dike. The tanks were certified closed in 1988.

The facility has no record of unmitigated releases that could have impacted the air, soil, surface water, sediment, or groundwater. Several small spills have been documented at the facility, however, all records indicate that these spills were appropriately addressed using spill mitigation techniques such as absorbent pads. Furthermore, these spills have primarily occurred and have been contained on paved areas which would minimize the potential for environmental contamination.

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)	____	____	____	____	____	____	____
Soil (surface, e.g., <2 ft)	____	____	____	____	____	____	____
Surface Water	____	____	____	____	____	____	____
Sediment	____	____	____	____	____	____	____
Soil (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).

_____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation. (potential contamination of subsurface soil and potential exposure pathway evaluation)

_____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

[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"**[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 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 expected not to be "significant."

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

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[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 "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 RCRA Info 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 L.E. Hutchens Inc. facility, EPA ID # VAD981105521, located in Stuart, Virginia, 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 Ryan J. Kelly Date 9/21/09
(print) Ryan J. Kelly
(title) Environmental Engineer

Supervisor Durwood W. Willis Date 9/21/09
(print) Durwood Willis
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Locations where References may be found:

VA Department of Environmental Quality, Office of Hazardous Waste

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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.