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:	**Covermaster Inc./Truck Accessories Group DBA Leer Midwest**
Facility Address:	**57784 C.R. 3 South, Elkhart, IN 46517**
Facility EPA ID #:	**IND 982 204 349**

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 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 programs 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		IDEM closure certification in January 1998, VOCs also below MCLs in drinking water compliance monitoring
Air (indoors)[2]		X		No affected indoor air
Surface Soil (e.g., <2 ft)		X		IDEM closure certification in January 1998, No affected surface soil
Surface Water		X		No affected surface water
Sediment		X		No affected sediment
Subsurf. Soil (e.g., >2 ft)		X		No affected subsurface soil
Air (outdoors)		X		No affected outdoor air

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 subject property encompasses an estimated 180,000 sq. ft. of land that was previously used by Covermaster, Inc. for the manufacturing of truck caps, truck toppers and camper shells from approximately the mid 1980s until 2008. The site is currently occupied by Truck Accessories Group, LLC dba LEER Midwest, which performs operations similar to those performed by Covermaster.

IDEM information indicates that Corrective Action was required at the site because the owner inadvertently stored hazardous waste longer than 90 days, per a 1995 State Annual Waste Handler Form. State records also show that a RCRA Closure Plan, dated Oct. 5, 1996, was approved for the site in January 1997, following a public notice period in November 1996. A Certification of Clean Closure was issued by IDEM in January 1998.

No data from the closure report was available for review; however, the Closure Plan approval letter from IDEM instructed Covermaster to collect soil samples to a depth of two feet, in one foot increments. Given the issuance of a clean closure certification by IDEM in January 1998, the work appears to have been sufficient to warrant closure. Event codes under RCRA info were entered under Permitting, not Corrective Action. A 2009 IDEM inspection identified no evidence of releases from the current hazardous waste storage areas.

The facility uses groundwater for potable purposes and was required by IDEM to complete quarterly sampling for drinking water wells used at the site. Groundwater sampling indicated the presence of low levels of 1,1,1-TCA during the period between 2006 and 2010, but the concentrations were below MCLs

(appx. 6 ppb), and are likely from another nearby site, since acetone and waste paint were the principle hazardous wastes associated with the non-notifier status for storage at the site.

Key References:

1) IDEM Closure Plan Approval, January 21, 1997
2) IDEM Closure Certification, January 22, 1998
3) IDEM Notice of Violation Letter, December 20, 2004
4) IDEM Industrial/Hazardous Waste Inspection Report, August 12, 2009

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							
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.

_____

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 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 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

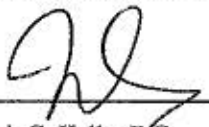
Rationale and Reference(s)

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 — 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 Covermaster Inc./Truck Accessories Group DBA Leer Midwest facility, EPA ID # (IND 982 204 349), located at 57784 C.R. 3 South in Elkhart, Indiana 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 12/15/11

(print) Joseph C. Kelly, P.G.

(title) Physical Scientist

Supervisor: (signature)  Date 12/15/11

(print) Hak Cho

(title) Section Chief

(EPA Region / State) LCD/RRB, CA1 Region 5

Locations where References may be found:

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Chicago, IL 60604
9th floor, cubicle 09048 hard drive

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.