

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99



RDMS DocID 00100118

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

Current Human Exposures Under Control

RCRA RECORDS CENTER
FACILITY: Spirol International
I.D. NO. CT 001140862
FILE LOC. R-13
OTHER _____

Facility Name: Spirol International Corporation
Facility Address: 30 Rock Avenue Danielson, Connecticut 06239
Facility EPA ID #: CTD 001140862

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 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)
Page 2

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	✓	—	—	<u>See attached worksheet/VOCs and cadmium</u>
Air (indoors)	—	✓	—	<u>See attached worksheet</u>
Surface Soil (e.g., <2 ft)	✓	—	—	<u>See attached worksheet/SVOCs and chromium</u>
Surface Water	✓	—	—	<u>See attached worksheet/cadmium</u>
Sediment	✓	—	—	<u>See attached worksheet/cadmium</u>
Subsurf. Soil (e.g., >2 ft)	✓	—	—	<u>See attached worksheet/VOCs and cadmium</u>
Air (outdoors)	—	✓	—	<u>See attached worksheet</u>

— 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 worksheet for discussion. Supporting documentation can be found in the following previously submitted documents:

- 1) Work Scope Outline (January 2003).
- 2) Sensitive Receptor Survey (September 2003)
- 3) May 2003 Quarterly Groundwater Monitoring Report.
- 4) Site Screening Investigation (April 1996)
- 5) Phase I Hydrogeologic Investigation (September 1997)

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)
Page 3

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	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>		<u>No</u>	<u>No</u>
Air (indoors)	<u>NA</u>	<u>NA</u>	<u>NA</u>				
Surface Soil (e.g., <2 ft)	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>No</u>
Surface Water	<u>Yes</u>	<u>No</u>			<u>Yes</u>	<u>Yes</u>	<u>Yes</u>
Sediment	<u>No</u>	<u>No</u>			<u>No</u>	<u>No</u>	
Subsurf. Soil (e.g., >2 ft)				<u>No</u>			<u>No</u>
Air (outdoors)	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>		

Instructions for Summary Exposure Pathway Evaluation Table:

- Strike-out specific Media including Human Receptors’ spaces for Media which are not “contaminated”) as identified in #2 above.
- 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) See attached worksheet for discussion. Supporting documentation can be found in the following previously submitted documents:

- 1) Work Scope Outline (January 2003),
- 2) Sensitive Receptor Survey (September 2003)
- 3) May 2003 Quarterly Groundwater Monitoring Report.
- 4) Site Screening Investigation (April 1996)
- 5) Phase I Hydrogeologic Investigation (September 1997)

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

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) See attached worksheet for discussion. Supporting documentation can be found in the following previously submitted documents:

- 1) Work Scope Outline (January 2003).
- 2) Sensitive Receptor Survey (September 2003)
- 3) May 2003 Quarterly Groundwater Monitoring Report.
- 4) Site Screening Investigation (April 1996)
- 5) Phase I Hydrogeologic Investigation (September 1997)

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. **Current**

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)
Page 6

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 - 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 Spirol International facility, EPA ID # CTD 001140862, located at 30 Rock Avenue, Danielson, Connecticut 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) Carolyn J. Casey Date 9/26/03
Carolyn Casey
US EPA Region I

Supervisor (signature) Matthew R. Hasland Date 9/29/03
(print) Matthew R. Hasland
(title) Section Chief
(EPA Region or State) Reg. I

Locations where References may be found:

US EPA RECORDS CENTER
1 CONGRESS ST BOSTON MA 02114

Contact telephone and e-mail numbers

MARK CONTI
860-774-8571
MCONTI@SACT.COM

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.

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA CORRECTIVE ACTION ENVIRONMENTAL INDICATOR (EI) RCRIS CODE (CA725) – SUPPLEMENTAL WORKSHEET
SPIROL INTERNATIONAL CORPORATION, DANIELSON, CT EPA ID # CTD 001140862**

Media	Question 2		Potential Human Exposures	Question 3		Question 4	Question 5	Question 6	
	Is media contaminated above appropriately protective risk-based levels?			Are there complete pathways between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?		Can exposures from complete pathway reasonably be expected to be significant (with respect to the "acceptable levels" used in Question 2)?	Can the significant exposure be shown to be within acceptable limits?	Status Code	
Groundwater	Yes	<p>Appropriate levels used in this evaluation included CTDEP Remediation Standard Regulations (RSRs) Surface Water Protection Criteria (SWPC) throughout the water column; Residential Volatilization Criteria (RVC) for shallow groundwater at the down-gradient property boundaries; Industrial/Commercial Volatilization Criteria (I/C VC) for on-site shallow groundwater and Groundwater Protection Criteria in areas toward known off-site well field.</p> <p>Although the Site is located in an area classified by CTDEP as having GB groundwater, it is located adjacent to a known well field side-gradient of the site. Several compounds exceed the groundwater protection criteria established by the CTDEP for GA groundwater (see Table 5 of the attached May 2003 Quarterly Groundwater Monitoring Report). However, comparisons to drinking water standards in areas toward a known off-site well field indicated no exceedances. Additionally, regular testing of the well field ensures that water quality is acceptable for human consumption.</p> <p>During a recent round of groundwater monitoring (May 2003) at the Site, 1,1-DCE was detected above the SWPC in four wells, and total cadmium was detected above the SWPC in three wells. No other compounds were detected exceeding the SWPC.</p> <p>Additionally, five monitoring wells had VOCs (1,1-DCE, TCE, and vinyl chloride) detected (May 2003) in groundwater that exceeded the residential VC. All five of these monitoring wells are screened within the intermediate to deep aquifer and have an adjacent shallow water table monitoring well (part of a well cluster). No VOCs were detected in the shallow groundwater collected from these adjacent shallow water table monitoring wells.</p>	Residents	No	No private or public drinking water supply wells are located down-gradient of the Site. Refer to Sensitive Receptor Survey (September 2003).				YE
			Workers	No	No on-site usage of groundwater.				YE
			Day-Care	No	No Day-Care facilities				YE
			Construction Worker	No	The depth to groundwater down-gradient from source areas and within the contaminant plume ranges from approximately 10 to 12 feet below ground surface (bgs). No excavation work is planned at the Site, it can be reasonably expected that under current uses, construction workers would not encounter contaminated groundwater.				YE
			Trespassers	NA					YE
			Recreation	No	Groundwater beneath the site is classified as being degraded and not suitable as a potential drinking water source. Public water supply is available at the site and surrounding vicinity.				YE
			Food Supply	No	Two non-potable wells are located down-gradient of the Site. Refer to the SRS (September 2003). The water from these wells is used for car washing and occasional garden/grass watering. Analytical results of water samples collected in April 1999 indicated that no detected constituents exceeded the RSR Criteria.				YE
Air (Indoors)	No	<p>An SVE system was installed beneath PAOC #13/27 and #14/10 (former plating room/former vapor degreaser and tumbling room/former hazardous waste and chemical storage areas) and activated in April 2000. The objective of this system is to remove VOC contamination from soils. An added benefit from the operation of the SVE system is to limit the potential vapor migration into the building. W&C has been operating the system since October 2002, providing monthly system maintenance tasks as well as the collection of soil vapor samples. Analytical results of soil vapor samples collected monthly from October 2002 until the system was shutdown in March 2003 indicated that no detected constituents exceeded the CTDEP Soil Vapor Criteria. As indicated above, the system was shutdown in March 2003 for evaluation of remediation progress. A soil vapor sample was collected on September 2, 2003. Analytical results from this sample indicate that no detected constituents exceeded the CTDEP Soil Vapor Criteria. The system will remain inactive for the next three months at which time the system will be re-sampled and remediation progress will again be re-evaluated.</p>	Residents	NA				YE	
			Workers	NA				YE	
			Day-Care	NA				YE	
			Construction	NA				YE	
			Trespassers	NA				YE	
			Recreation	NA				YE	
			Food Supply	NA				YE	

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Media	Question 2		Potential Human Exposures	Question 3		Question 4		Question 5	Question 6
	Is media contaminated above appropriately protective risk-based levels?			Are there complete pathways between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?		Can exposures from complete pathway reasonably be expected to be significant (with respect to the "acceptable levels" used in Question 2)?		Can the significant exposure be shown to be within acceptable limits?	Status Code
Surface Soil (<2 ft)	Yes	<p>Two areas (PAOC #2 and PAOC #3) have been identified with surface soils that contain contaminants at concentrations exceeding the CTDEP RSR Industrial/Commercial Direct Exposure Criteria (I/C-DEC). Refer to the previously submitted Site Screening Investigation (April 1996) and the Phase I Hydrogeologic Investigation (September 1997).</p> <p>PAOC #2 Former Tumbling Lagoon #3 (PAOC #2) was excavated in April of 1989. The extent of the excavation was determined horizontally by removing all visibly contaminated soil/sludge and continued vertically until the water table was encountered. Four confirmatory side-wall samples were collected from just above the water table and analyzed for leachable chromium. Analytical results from all four samples indicated that chromium concentrations were below the CTDEPs GB Pollutant Mobility Criteria (0.5 mg/L). At the time of the remediation, no confirmatory soil samples were collected at the base of the excavation. The excavation remained open, awaiting formal approval by the CTDEP.</p> <p>In 1996 five soil samples were collected at the base (approximately 10 feet below the surrounding ground surface) of the previously excavated lagoon (AOC #2). Analytical results from two of the soil samples (B02-B13 and B02-B14) indicated that concentrations of chromium (132 mg/kg and 389 mg/kg) exceeded the CTDEPs I/C-DEC for chromium (100 mg/kg).</p> <p>PAOC #3 The use of the Former Zinc and Cyanide Lagoons (PAOC #3) was discontinued in the fall of 1980 due to discontinued use of cyanide plating solutions and the upgrading of the facility's wastewater treatment system. These lagoons (two cyanide and one zinc) were backfilled and graded leaving waste residue in place.</p> <p>In 1996, approximately 37 soil borings were advanced throughout AOC #3. Soil samples were generally collected from near-surface (0-2 feet), an intermediate depth (5-7 feet), and above the water table (10-12 feet). Analytical results from five of the shallow soil samples (0-2 feet) indicated concentrations of contaminants that exceeded the CTDEPs I/C-DEC. Three of the soil samples (B03-B03, B03-B11, and B03-B24) had concentrations of benzo(a)pyrene (1.1 mg/kg, 4.1 mg/kg, and 1.2 mg/kg) that exceeded the I/C-DEC (1 mg/kg). Two other soil samples (B03-B15 and B03-B16) had concentrations of chromium (114 mg/kg and 111 mg/kg) that exceeded the I/C-DEC (100 mg/kg).</p>	Residents	No	There are no residents on the Site. The Site is zoned for industrial use.				YE
			Workers	Yes	The western portion of the Site, where PAOC #2 and #3 are located, is unused by the facility. These areas are not landscaped, as are the rest of the Site's grounds. The only activities that occur in these areas are occasional grounds maintenance (mowing) and activities associated with the ongoing environmental monitoring.	No	These areas are not facility work areas nor are they worker break areas. Spirol does provide outdoor tables in other parts of the facility grounds. Exposure is expected to be minimal and limited to occasional grounds maintenance (mowing) and activities associated with the ongoing environmental monitoring.		YE
			Day-Care	No	There are no Day-Care facilities on the Site. The Site is zoned for industrial use.				YE
			Construction	No	At present, there are no on-going Site construction activities. These areas are unused by the facility, with no plans for future expansion. Facility personnel that would be involved in future construction planning are aware of the Site's environmental issues and would not allow excavation activities without trained environmental professionals and adequate health and safety plans addressing potential worker exposures. As such, there will be no complete exposure pathway for construction workers.				YE
			Trespassers	Yes	The Site is not secure for trespassers. No fencing exists at the property lines or around the western portion of the Site, where PAOC #2 and #3 are located.	No	Incidental trespasser exposure is not expected to be significant.		YE
			Recreation	No	There are no recreational facilities or activities on the Site. The Site is zoned for industrial use.				YE
			Food Supply	No	There are no vegetables, fruits or other crops grown on the Site; The grass on the Site is not consumed by domestic animals used to provide meat or dairy products.				YE

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Media	Question 2		Potential Human Exposures	Question 3		Question 4		Question 5	Question 6	
	Is media contaminated above appropriately protective risk-based levels?			Are there complete pathways between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?		Can exposures from complete pathway reasonably be expected to be significant (with respect to the "acceptable levels" used in Question 2)?		Can the significant exposure be shown to be within acceptable limits?	Status Code	
Surface Water	Yes	<p>Two surface water bodies are located adjacent to the Site; they are the Five Mile River and the Whetstone Brook. Only the Five Mile River is located hydraulically down-gradient of the Site. Refer to the SRS (September 2003).</p> <p>During a recent round of groundwater monitoring (May 2003), 1,1-DCE was detected above the SWPC in four wells, and total cadmium was detected above the SWPC in three wells. No other compounds were detected exceeding the SWPC.</p> <p>All four of the monitoring wells where 1,1-DCE was detected above the SWPC are screened within the intermediate to deep aquifer and have an adjacent shallow water table monitoring well (part of a well cluster). No VOCs were detected in the shallow groundwater collected from these adjacent shallow water table monitoring wells. Groundwater from the intermediate and deep aquifer is not expected to discharge to any nearby surface water bodies.</p> <p>Analytical results from groundwater samples collected from three shallow water table monitoring wells (MW-03, MW-04, and MW-05) indicated concentrations of cadmium (23 µg/l, 130 µg/l, and 160 µg/l) that exceeded the SWPC for cadmium (6 µg/l)</p> <p>No surface water samples have been collected of either the Five Mile River or the Whetstone Brook.</p>	Residents	Yes	The Five Mile River is locally utilized for recreational fishing. A potential pathway exists from the ingestion of fish. Recreational bathing in the Five Mile River is not an issue due to low water level, thick shoreline vegetation, lack of points of interest (waterfalls, etc.), and an extremely mucky bottom. The mucky bottom also precludes fishermen from wading in the river. Refer to the SRS (September 2003).	No	Refer to Section 2.3 of the SRS (September 2003). As established in CTDEPs Water Quality Standards, the human health criteria for the consumption of organisms is 10,769 µg/L of cadmium in surface water, well above concentrations found in adjacent groundwater.		YE	
			Workers	No						YE
			Day-Care	NA						YE
			Construction	NA						YE
			Trespassers	Yes	Fishing the Five Mile River, refer to "Residents" above.	No	Refer to "Residents"			YE
			Recreation	Yes	Fishing the Five Mile River, refer to "Residents" above.	No	Refer to "Residents"			YE
			Food Supply	Yes	Ingestion of fish caught from the Five Mile River. Refer to SRS (September 2003).	No	Refer to "Residents"			YE
Sediment	Yes	<p>No sediment samples have been collected from the Five Mile River or the Whetstone Brook to date. Assuming that shallow groundwater from the site discharges to the near down-gradient surface water body (the Five Mile River) the potential exists that sediments could be impacted with cadmium.</p>	Residents	No	Residents are not expected to come in contact with sediments from the Five Mile River. The river is not recreationally used by residents for bathing. Refer to the SRS (September 2003) and Surface Water Pathways "Residents" above.				YE	
			Workers	No	There is no reason for a facility worker to come in contact with the sediments of the Five Mile River.				YE	
			Day-Care	NA					YE	
			Construction	NA					YE	
			Trespassers	No	There is no reason for a facility worker to come in contact with the sediments of the Five Mile River.					YE
			Recreation	No	There are no recreational land used located down-gradient of the Site. The Five Mile River is not recreationally used by residents for bathing. Refer to the SRS (September 2003) and Surface Water Pathways "Residents" above.					YE
			Food Supply	No	There are no activities associated with "Food Supply" located down-gradient of the Site. It is there reasonable to expect that no pathway exists.					YE

ONLY LIMITED EXPOSURE, IF ANY, IS EXPECTED FOR TRESPASSERS
THAT MAY ... ALSO, REFER TO "RESIDENTS" ABOVE.

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Media	Question 2		Potential Human Exposures	Question 3		Question 4		Question 5	Question 6
	Is media contaminated above appropriately protective risk-based levels?			Are there complete pathways between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?		Can exposures from complete pathway reasonably be expected to be significant (with respect to the "acceptable levels" used in Question 2)?		Can the significant exposure be shown to be within acceptable limits?	Status Code
Subsurface Soil (> 2ft)	Yes	There are several areas within the Site that are known to contain or are expected to contain contaminated soils 2 feet below the ground surface and lower. These areas include AOCs #2 (lagoon waste residue buried in-place), AOC #6 (former waste oil dry well system), AOC #22 (lagoon waste residue buried in-place), and AOC #5 (waste burial area, unconfirmed remediation)	Residents	NA					YE
			Workers	NA					YE
			Day-Care	NA					YE
			Construction	No	At present, there are no on-going Site construction activities. These areas are unused by the facility, with no plans for future expansion. Facility personnel that would be involved in future construction planning are aware of the Site's environmental issues and would not allow excavation activities without trained environmental professionals and adequate health and safety plans addressing potential worker exposures. As such, there will be no complete exposure pathway for construction workers.				YE
			Trespassers	NA					YE
			Recreation	NA					YE
			Food Supply	No	There are no activities associated with "Food Supply" located at the Site or hydraulically down-gradient of the Site.				YE
Air (Outdoors)	No	VOCs are only detected in groundwater samples collected from the intermediate and deep aquifers. Analytical results from groundwater samples collected from the shallow groundwater (water table wells) do not indicate the presence of VOCs.	Residents	NA					YE
			Workers	NA					YE
			Day-Care	NA					YE
			Construction	NA					YE
			Trespassers	NA					YE
			Recreation	NA					YE
			Food Supply	NA					YE