

MATT
EAWH

Basis for Human Exposures Controlled Determination
RCRIS Code CA725

at

Southdown, Inc.
(Former Connecticut Treatment Corporation)
EPA ID No. CTD980515290
0 Cross St.
Bristol, CT

The purpose of this report is to provide the basis for determining that the Southdown, Inc. - 0 Cross Street, Bristol, CT Facility can be recorded with the status code of **YE** under the RCRIS Event Code of CA725--Human Exposures Controlled.

Based on the information available, and subject to the limitations cited below, there are no current unacceptable risks to humans due to releases of contaminants subject to RCRA Corrective Action. This determination is made in accordance with the "Stabilization" guidance sent to Regional Waste Management Directors by Michael Shapiro on July 29, 1994, and is based on the facts, conclusions and references outlined below.

1. CONCLUSION

There is no unacceptable human exposure to any contaminant concentration above action levels that has been detected or is reasonably suspected based on current contaminant concentrations and current site conditions. Action has been taken¹ such that unacceptable threats to human health from actual exposure to the contamination are not plausible based on current uses of the site.

2. RELEASE SUMMARY

The former Connecticut Treatment Corporation (CTC) Facility, located at 0 Cross Street, Bristol, Connecticut, was a RCRA hazardous waste storage facility. The facility was used for the storage of a variety of liquid hazardous wastes including waste oils, aqueous wastes bearing acids, heavy metals, cyanide and phenols. Eight underground concrete tanks were constructed in 1979 to accommodate these wastes; the tanks were lined with a chemical resistant epoxy sealant or fiberglass. The facility used the tanks for temporary storage

¹ The facility underwent clean closure activities under the direction of the CTDEP.

before transport to CTC's Broderick Road facility, where the wastes were treated. In 1984, CECOS Treatment Corporation, now Southdown, Inc. of Houston, Texas (Southdown), purchased the Facility from CTC and continued to store aqueous wastes at the site. Active storage operations ceased in 1987.

In 1981, the Water Compliance Unit of the Connecticut Department of Environmental Protection (CTDEP) required CTC to install and monitor groundwater wells at the Facility. In 1985, the EPA completed a RCRA Facility Assessment (RFA) of the Facility, the primary purpose of which was to identify areas requiring further investigation for the possible presence of hazardous constituents. The results of the RFA caused EPA to determine that further investigation, through performance of a RCRA Facility Investigation (RFI) was necessary. Therefore, in 1986, EPA issued the Facility a Hazardous and Solid Waste Amendment (HSWA) permit which required the Facility to conduct an RFI. The RFI was completed in January of 1992. Results of the RFI are provided in the RFI Report entitled "RCRA Facility Investigation, 30 Cross Street, Bristol, Connecticut", dated January 1992.

The results of the RFI demonstrated that there had been minor releases of low concentrations of certain phthalates and cyanide to surficial soils. The RFI concluded, and EPA concurs, that these releases do not pose an unacceptable risk to public health or the environment. In addition, the RFI concluded that interim measures or a Corrective Measures study were not necessary. In December, 1992, EPA conditionally approved the RFI and requested that the Facility initiate closure activities.

Following conditional approval of the RFI by EPA, the Facility initiated closure activities under the guidance of the CTDEP. The closure activities included the decontamination and demolition of the eight concrete storage tanks. The results of the closure activities are provided in a report entitled "Tank Closure Certification Report, Southdown, Inc., Cross Street Facility, Bristol, Connecticut" dated November, 1995. This Tank Closure Certification Report is included in the Administrative Record. CTDEP approved the closure of the tanks and the Facility in a letter dated March 28, 1996.

In general, the site is underlain by a single overburden aquifer composed of glacial outwash and till deposits. Bedrock was encountered at approximately 31 to 41 feet below grade. Depth to the groundwater table ranges between approximately 19 to 28 feet below grade. The average horizontal hydraulic conductivity of the glacial outwash and till deposits is approximately 21 and 1 to 3 feet per day, respectively. Groundwater flow is in an easterly direction towards the Eightmile river.

3. RELEVANT CONDITIONS

- Sources of potential contamination have been removed under Southdown's clean closure activities which included decontamination, demolition and removal of the eight underground concrete storage tanks.
- In a Statement of Basis prepared for the facility, Southdown's clean closure activities had been evaluated with respect to standards for remedies and remedy selection factors. Proposed Subpart S, 40 CFR 264.525(a) and 40 CFR 264.525(b), respectively. Southdown's clean closure activities were found to be comprehensive with respect to the standards and factors referenced above, including: (1) overall protection, (2) attainment of media cleanup standards, (3) control of sources of releases, (4) compliance with waste management standards, (5) long-term reliability and effectiveness, (6) reduction of toxicity, mobility, or volume of wastes, (7) short-term effectiveness, (8) implementability, and (9) cost.
- The site is located in an industrial area served by public water and sewers.
- Human exposures are not at levels that would pose an unacceptable risk based on an assessment of current risk because human exposures no longer exist (having been entirely removed by the clean closure activities). Therefore,
 - exposure of trespassers or visitors to wastes or contaminated soils is implausible;
 - exposure of on-site workers to wastes or contaminated soils is implausible since there is no soil contamination;
 - groundwater and soils sampling have demonstrated that there had been no releases of contaminants to groundwater. The minor releases of contaminants to surface soils have been remediated by the closure activities.

In summary, analysis of current site conditions demonstrate that there is no unacceptable human exposure to any contaminant (either detected or reasonably suspected to be onsite) in concentrations above action levels, based on current contaminant concentrations and current site conditions. As a result of the tank closure activities, no contamination remains at the facility which may require

further remediation.

4. REFERENCES

- a. RCRA Facility Investigation, 30 Cross Street, Bristol, CT, January 1992.
- b. Tank Closure Certification Report, Southdown, Inc., Cross Street Facility, Bristol, Connecticut, November 1995.
- c. Statement of Basis for Southdown, Inc., 0 Cross Street, Bristol, Connecticut Facility, July 1996.

5. SIGN OFF

Prepared by:

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Date 8/8/96

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