



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: Pratt and Whitney
Facility Address: 113 Wells Street, North Berwick Maine
Facility EPA ID #: MED 000 791 681

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 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).

RCRA RECORDS CENTER
FACILITY Pratt + Whitney
ID. NO. MED 000791681
FILE NO. R-13
OTHER #106610

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

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be “**contaminated**”<sup>1</sup> 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>  x  </u>	<u>    </u>	<u>    </u>	PCE (13 ppm), TCE (1.4 ppm), DCE (4.5 ppm), Vinyl Chloride (177 ppb), 1,4-dioxane (421 ppb)
Air (indoors) <sup>2</sup>	<u>    </u>	<u>  x  </u>	<u>    </u>	
Surface Soil (e.g. <2 ft)X	<u>  x  </u>	<u>    </u>	<u>    </u>	Below concrete slab, not accessible
Surface Water	<u>  x  </u>	<u>    </u>	<u>    </u>	PCE (0.9 ppb), 1,2-DCA (2 ppb), Vinyl Chloride (5.6 ppb)
Sediment	<u>  x  </u>	<u>    </u>	<u>    </u>	Iron (26.3 ppm), Carbon disulfide (9.1ppb)
Subsurf. Soil(e.g., >2 ft)	<u>  x  </u>	<u>    </u>	<u>    </u>	PCE (691 ppm), 1,2 DCA (32 ppm), 1,1-DCE (44 ppm)
Air (outdoors)	<u>    </u>	<u>  x  </u>	<u>    </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.

\_\_\_X\_\_\_ 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:**

During the period 2002 through 2005, several site investigation phases resulted in the delineation of a shallow groundwater plume that originates at a former sub-slab degreaser beneath the main manufacturing building and migrates north and discharges to the West River. VOCs and their breakdown products and 1,4 Dioxane have been detected in groundwater above standards and in surface water above the Maine Surface Water Quality Criteria. A quarterly monitoring program has been on-going.

Site investigations are summarized in the PWNB RFI investigation and have revealed contaminants that are, in general, related to operation of a solvent degreaser. The contaminants detected are at concentrations greater than Project Action Levels (PALs), defined as the lesser of the Maximum Exposure Guidelines (MEGs) or the Maximum Contaminant Levels (MCLs): tetrachlorethylene, 1,1,1-trichloroethane, 1,1-

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dichloroethane, 1,1-dichloroethene, vinyl chloride, and 1,4-dioxane. Maine uses the lower of either the MCL or the MEG as a guideline for groundwater. All groundwater must meet the drinking water guidelines to be considered remediated. Groundwater is not used as a drinking water supply at this site. See Figure 3, VOC Distribution map from April 2007 event attached for currently detected concentrations in groundwater.

1,4 Dioxane was a common chemical additive to degreasing agents. It behaves differently from the chlorinated aliphatic hydrocarbons; it is extremely soluble, stable and does readily disassociate from water. It moves through the groundwater unchanged relative to other contaminants despite the fact it was likely to have been 10% or less of the total solvent load.

In general, soils are sands and gravel down to 9 to 11 feet. At this depth, a sharp transition to gray, dense, silty sand is observed at all locations. The water table is observed at approximately 7 feet below the floor slab. Borings continue to about 20 feet below ground surface.

For both groundwater and surface water parameters, the laboratory methods used for VOCs was SW846 8260B, 1,4 Dioxane 8260SIM, Hexavalent Chromium 7196A, Metals 6010 B/7471, Sulphate 375.4 and Maine DRO/GRO for petroleum hydrocarbons.

References:

See Tables 1 through 4 attached for maximum levels identified to date.  
RFI Report dated November 2006;  
VOC Distribution Map Figure 3 (attached)  
Sub-slab Source Area Investigation, dated December 2005  
Long Term Monitoring Report Event No. 9 ( April 2007);and  
Vapor Intrusion Pathway Summary Page (attached)

Footnotes:

<sup>1</sup> "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).

<sup>2</sup> 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

**Current Human Exposures Under Control  
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Potential Human Receptors (Under Current Conditions)

<u>"Contaminated" Media</u>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food <sup>3</sup>
Groundwater	NO	NO	NO	NO			NO
Air (indoors)	---	NO	---				
Soil (surface, e.g., <2 ft)	NO	NO	NO	NO	NO	NO	NO
Surface Water	NO	NO	NO	NO	NO	NO	NO
Sediment	NO	NO			NO	NO	NO
Soil (subsurface e.g., >2 ft)				NO			NO
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)** There is no current or proposed future use of groundwater. Future construction of any new structures could expose humans to contaminated surface or subsurface soils, however the facility is currently well aware of pending concerns. Remediation efforts are underway to address the source area with in-situ chemical oxidation. Building structure overlies the source area and no construction activities are likely at this time. An evaluation of the pathways, show a low risk and health and safety staff would impose controls.

During the Phase II investigation, an extended bathymetry study of the West River and the embayment created behind the manufacturing building from a dam was conducted. Water depths and sediment thickness measurements were completed. A conclusion was made that the majority of the groundwater discharge from the plume with the highest VOC concentrations are occurring in the former river channel (deepest section prior to construction of the dam). Sediment thicknesses ranged from 0.1 to 4.0 feet. The former river channel appeared well scoured with limited sediment, below the sediment is a soft gray marine clay. Samples collected downstream and upstream of the embayment were non-detect for VOC's. Consumption of water and organisms by humans is believed to be a low to medium risk as it relates to any realistic exposure pathway. Pratt and Whitney own and control both sides of this area of the West River.

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

Source: RCRA RFI Version 2, November 2006 See Figure 5-1  
Phase II Investigation Report dated January 2005

Footnotes:

<sup>3</sup> 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”**<sup>4</sup> (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)?

\_\_\_ **NA** \_\_\_ 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): Public Water supply is available to this facility.

The potential exists that future development could be limited to commercial or industrial use. No use of groundwater for drinking water will be permitted.

Reference: Final RCRA RFI Report Version 2, November 2006

Footnotes:

<sup>4</sup> 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?

\_\_\_ **NA** \_\_\_ 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.

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\_\_\_\_\_ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

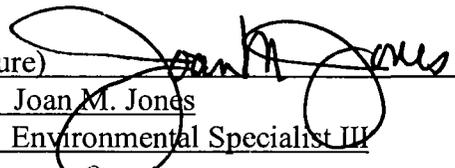
Rationale and Reference(s):

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):

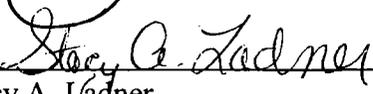
X  YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Pratt & Whitney North Berwick facility, EPA ID #  MED 000 791 681 , located in North Berwick, Maine 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)     
(print)  Joan M. Jones   
(title)  Environmental Specialist III

Date  9-28-07

Supervisor (signature)     
(print)  Stacy A. Ladner   
(title)  Unit Manager   
 State of Maine

Date  9-28-07

Reviewed by David Lim   
 David Lim 1/28/08   
 EPA

Locations where References may be found:  
Maine DEP File Room, Augusta, Maine

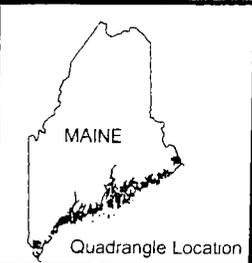
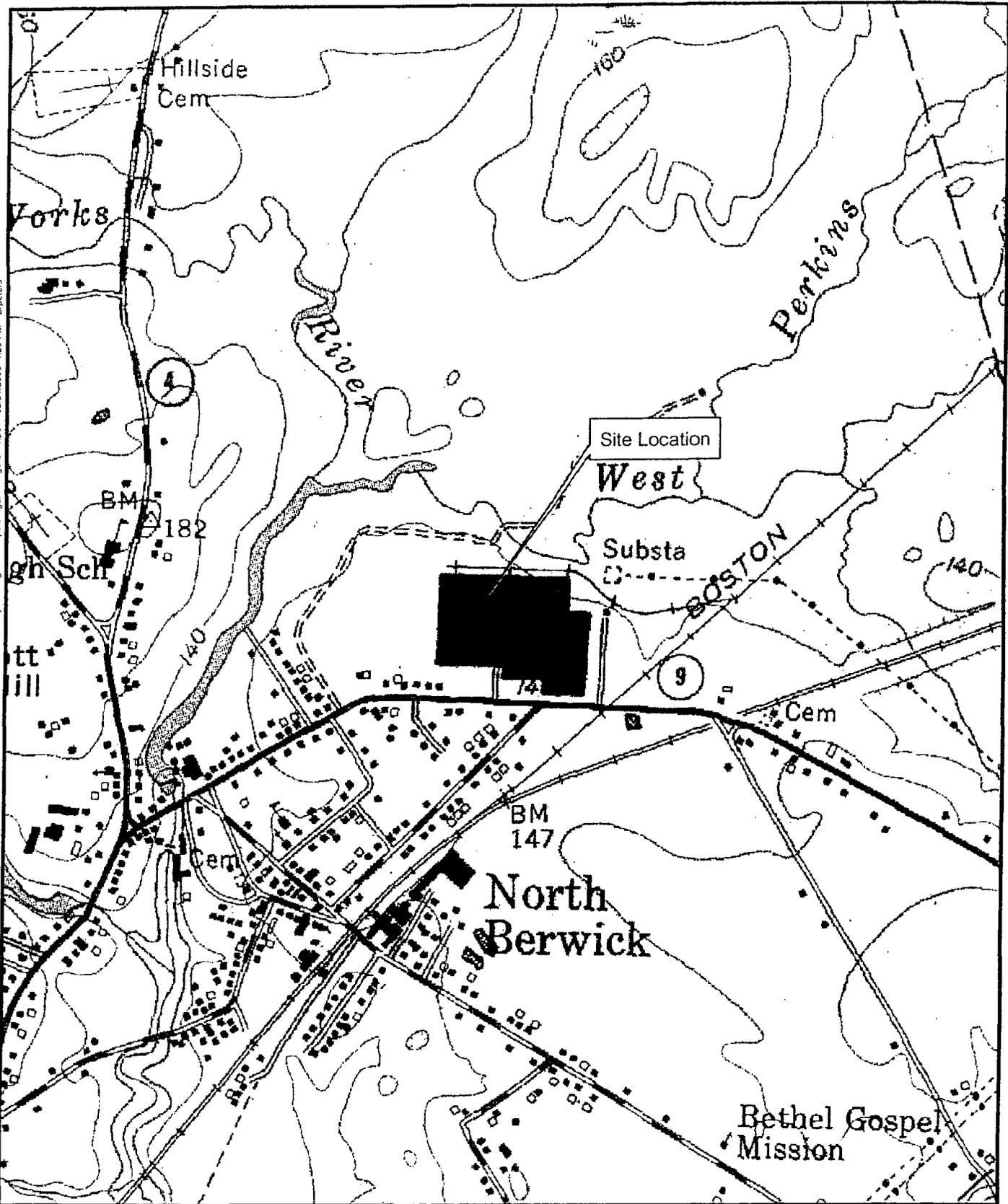
Contact telephone and e-mail numbers

(name) \_\_\_\_\_  Joan M. Jones   
(phone #) \_\_\_\_\_  207-287-7879   
(e-mail) \_\_\_\_\_  Joan. M. Jones@maine.gov

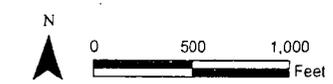
**FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK**

C/EI PRATT 725

Document: P:\Projects\JSP & W\North Berwick\GIS\Map Documents\Site Map.mxd PDF: P:\Projects\JSP & W\North Berwick\3617057083\4.0\_Deliverables\4.1\_Reports\RCRA Facility Investigation Report\Figures\Figure 1-1.pdf 02/21/2006 1:29 PM bpreters



1:24,000 scale digital topographic map  
obtained from Maine Office of GIS at  
<http://apollo.ogis.state.me.us/catalog>



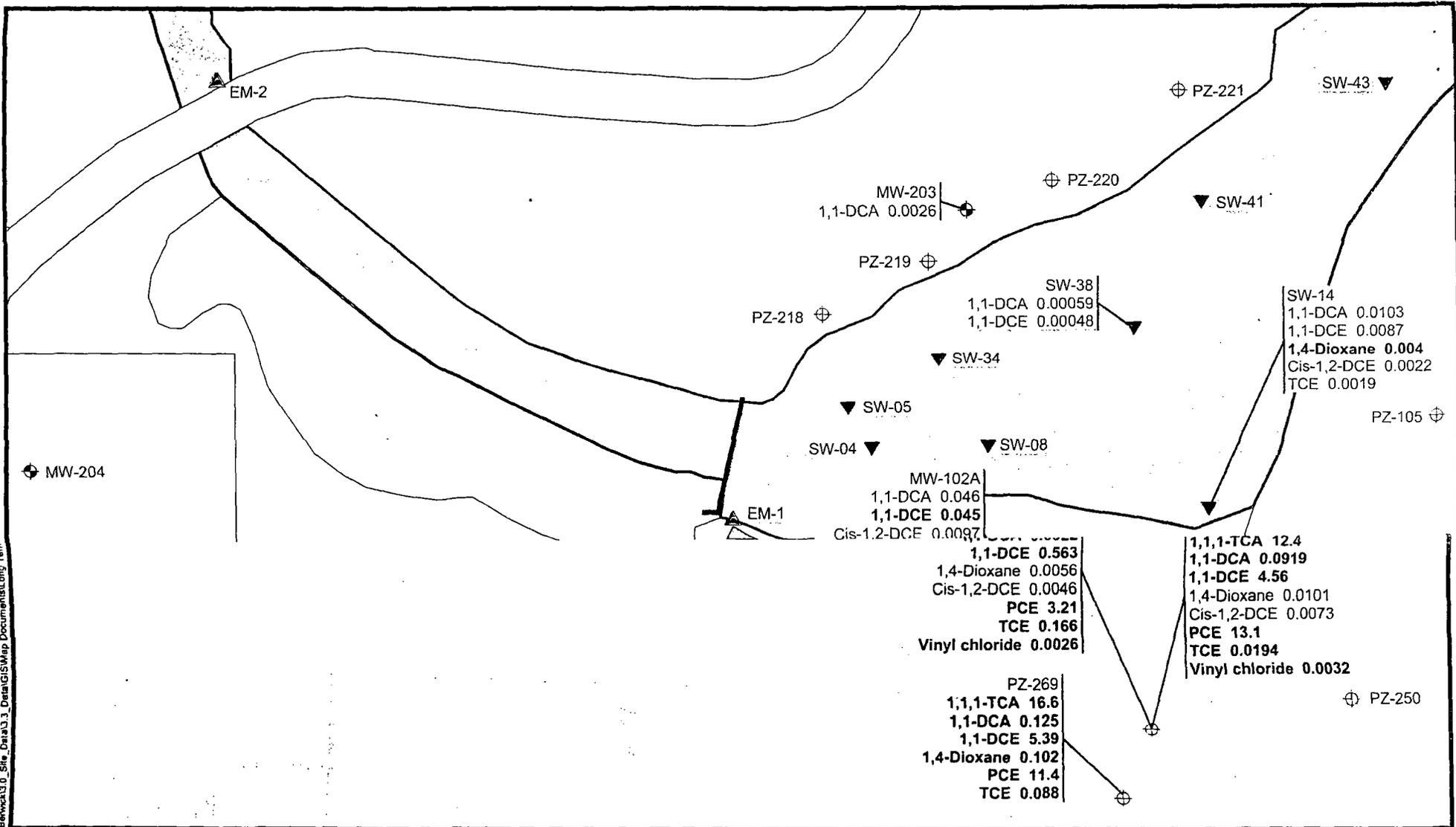
Prepared/Date: BRP 2/16/06 Checked/Date: NWH 2/16/06

Figure 1-1  
Site Location Map

RCRA Facility Investigation Report  
Pratt & Whitney  
North Berwick, Maine

MACTEC Engineering and Consulting, Inc.

Document: P:\Projects\SP & W\North Berwick\3.0\_Site\_Data\3.3\_DetialGISMap\_Document\Long Term



**Notes:**

1. Detected VOCs posted in mg/L
2. **Bold** Exceeds applicable PAL

N



- ▼ Surface Water
- ⊕ Piezometer
- ⊕ Monitoring Well
- ▲ Surface Water Elevation Measurement Location

**Legend**

- Main Facility
- Site Structures
- Pavement
- Embayment Dam
- Open
- Wooded
- River

Prepared/Date: BRP 06/12/07

Checked/Date: NWH 06/12/07

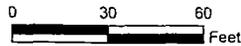


Figure 3  
 VOC Distribution Map  
 Long Term Monitoring Report Event #9, April 2007  
 Pratt and Whitney  
 North Berwick, Maine

MACTEC Engineering and Consulting, Inc.

TABLE 1  
DETECTED VOLATILE ORGANIC  
COMPOUNDS IN GROUNDWATER  
PRATT AND WHITNEY  
NORTH BERWICK, MAINE DEP

	Groundwater Protection Criteria		Maximum Detected Groundwater
	MEG	MCL	Field Sample
	1,1,1-Trichloroethane	200	200
1,1 Dichloroethane	70	70	<b>92</b>
1,1 Dichloroethene	0.6	7	<b>4560</b>
1,2 Dichloroethane	4	3	<b>30.4</b>
1, 4 Dioxane	32	NC	<b>854</b>
Cis-1,2 Dichloroethane	70	70	<b>95.2</b>
Tetrachloroethene	7	5	<b>13,100</b>
Trichloroethene	32	5	<b>1,420</b>
Vinyl Chloride	0.2	2.0	<b>177</b>
1,4 Dioxane	32	NC	527

NOTES: All values in ug/L

MEG                    State of Maine Maximum Contaminant Level  
MCL                    Federal Maximum Contaminant Level  
NC                      No criterion  
**Bolded**                values indicate criterion is exceeded

Source: Phase II, Stage I Investigation Report, dated 8-26-04  
Final RCRA RFI Report Version No. 2, November 2006  
Long Term Monitoring Event No. 9, dated June 2007

TABLE 2  
DETECTED VOLATILE ORGANIC COMPOUNDS  
IN SURFACE WATER  
PRATT AND WHITNEY  
NORTH BERWICK, MAINE

	Maine Statewide Water Quality Criteria				Maximum Detected
	Aquatic Life Protection		Human Health Protection		Surface Water Field Sample
	Acute	Chronic	W & O	O only	
Acetone	NC	NC	NC	NC	826
1,1 Dichloroethane	NC	NC	NC	NC	33
1, 1 Dichloroethene	11,600	NC	0.057	3.2	29
1,2 Dichloroethane	118,000	20,000	0.38	9806	2
Cis-1,2 Dichloroethene	NC	NC	NC	NC	5
Tetrachloroethene	5280	840	0.8	8.85	0.9
Toluene	17,500	NC	6,800	200,000	2
Trichloroethene	45,000	21,900	2.7	80.7	8
Vinyl Chloride	NC	NC	2.0	525	5.6

Notes:                all results and criteria in micrograms per liter (ug/L)  
W & O                ingestion of drinking water and fish  
O                        ingestion of fish only  
NC                      no criterion

Source: Phase II, Stage I Investigation Report , dated 8-26-04

TABLE 3  
**SEDIMENT METAL DETECTIONS**  
 PRATT AND WHITNEY  
 NORTH BERWICK, MAINE

Analyte	Unit	PAL	MEDIA QA	Maximum Detected
				October 2004 SEDIMENT Field Sample
Percent Solids	Percent	NA		75
Arsenic	mg/Kg	9.8		<b>12.1</b>
Chromium	mg/Kg	43		23.5
Copper	mg/Kg	32		17.2
Iron	mg/Kg	20000		<b>26,300 *</b>
Lead	mg/Kg	36		16.4
Manganese	mg/Kg	460		422
Mercury	mg/Kg	0.18		0.083
Nickel	mg/Kg	23		17.8
Zinc	mg/Kg	120		96.1

\***Bolded** values indicate criterion is exceeded

Source: Phase II Investigation Report, dated January 2005

TABLE 4  
**SEDIMENT VOC DETECTIONS**  
 PRATT & WHITNEY  
 NORTH BERWICK, MAINE

Analyte	Unit	PAL	MEDIA QA	Maximum Detected
				October 2004 SEDIMENT Field Sample
1,1 Dichloroethane	ug/Kg	27		6
1,1 Dichloroethene	ug/Kg	31		1.7
Acetone	ug/Kg	6400		135
Carbon disulfide	ug/Kg	0.85		<b>9.1 *</b>
Chloroethane	ug/Kg	59000		2.6
Cis-1,2 Dichloroethene	ug/Kg	400		1.1
Methyl ethyl ketone	ug/Kg	3900		10
Vinyl Chloride	ug/Kg	160000		1.5

**Notes:** PAL Project Action Level:

For acetone, MEK, chloroethane, and vinyl chloride – derived based on equilibrium partitioning assumptions based upon US EPA guidance, "ECO Update" volume 3, Number 2, EPA 540/F-95/038, January 1996-used only for compounds lacking sediment benchmarks from other sources.

For 1,1-DCE, methylene chloride, carbon disulfide, and 1,2-DCE- "Toxicological Benchmarks for Screening Potential contaminants of Concern for Effects on Sediment – Associated Biota", Jones et al, 1997, Oak Ridge National Laboratory, ES/ER/TM-95/R3.

BOLD Values exceed PALs

ug/kg = Micrograms per kilogram

Source: Phase II Investigation Report, dated January 2005

C/Table 1 EI 725

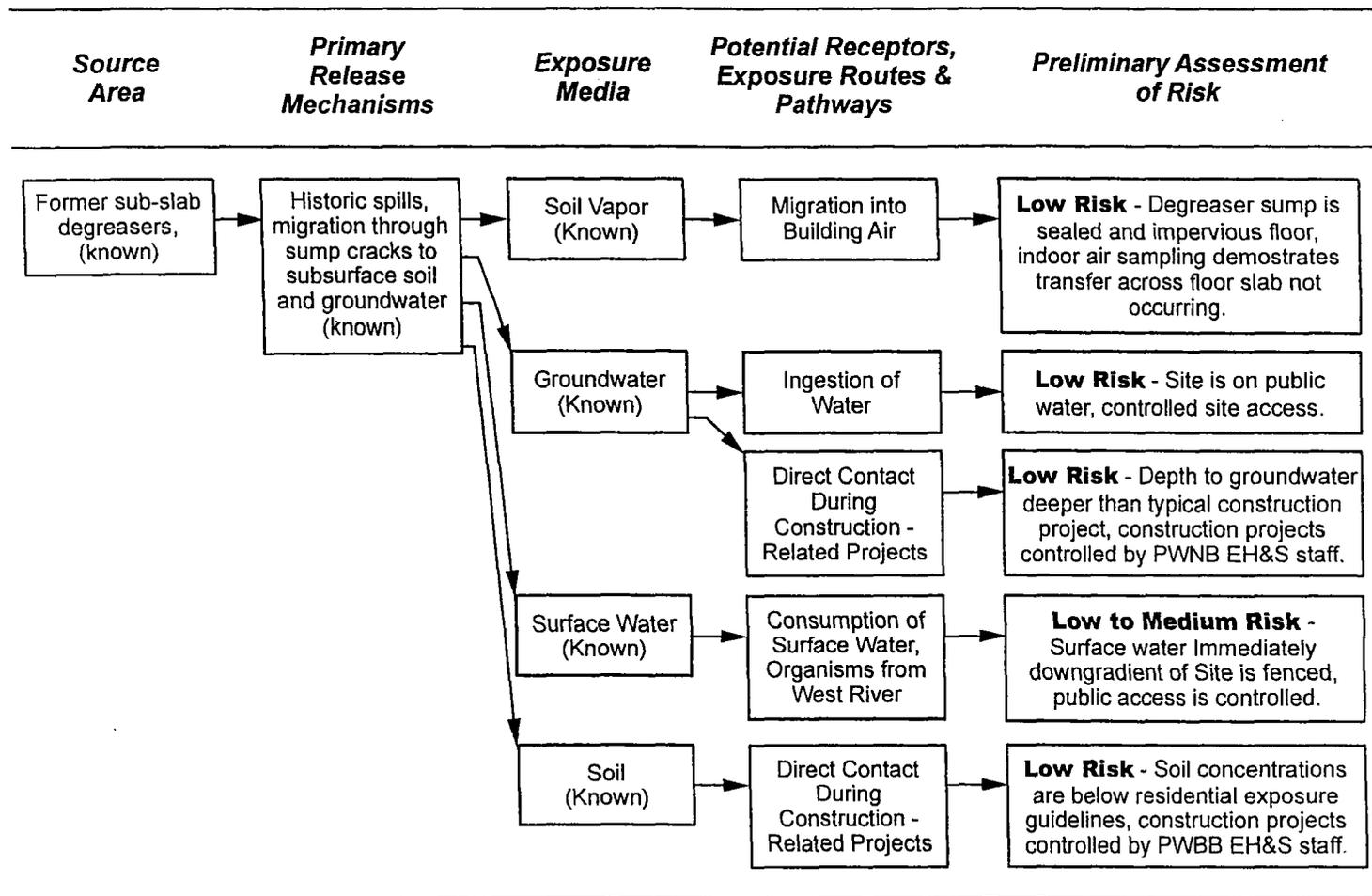


FIGURE 5-1  
CONCEPTUAL SITE MODEL

RCRA FACILITY INVESTIGATION REPORT  
PRATT & WHITNEY  
NORTH BERWICK MAINE

PREPARED: NWH  
CHECKED: MHL

VII. VAPOR INTRUSION PATHWAY SUMMARY PAGE

Facility Name: Pratt + Whitney

Facility Address: 113 Wello Street, No. Berwick, Maine

Primary Screening Summary

Q1: Constituents of concern Identified?

Yes

No (If NO, skip to the conclusion section below and check NO to indicate the pathway is incomplete.)

Q2: Currently inhabited buildings near subsurface contamination?

Yes

No

Areas of future concern near subsurface contamination?

Yes

No (If NO, skip to the conclusion section below and check NO to indicate the pathway is incomplete.)

Q3: Immediate Actions Warranted?

Yes

No

Secondary Screening Summary

Vapor source identified:

Groundwater

Soil

Insufficient data

Indoor air data available?

Yes

No

Indoor air concentrations exceed target levels?

Yes

No

*Subsurface data evaluation: (Circle appropriate answers below)*

<b>Medium</b>	<b>Q4 Levels Exceeded?</b>	<b>Q5 Levels Exceeded?</b>	<b>Data Indicates Pathway is Complete?</b>
Groundwater	YES / NO / NA / INS	YES / <b>NO</b> / NA / INS	YES / <b>NO</b> / INS
Soil Gas	YES / NO / NA / INS	YES / NO / NA / INS	YES / NO / INS

NA = not applicable

INS = insufficient data available to make a determination

**Site-Specific Summary**

*Have the nature and extent of subsurface contamination, potential preferential pathways and overlying building characteristics been adequately characterized to identify the most-likely-to-be-impacted buildings?*

*Yes*

*No*

*N/A*

EPA recommends that if a model was used, it be an appropriate and applicable model that represents the conceptual site model. If other means were used, document how you determined the potentially most impacted areas to sample. EPA recommends that predictive modeling can be used to support Current Human Exposures Under Control EI determinations without confirmatory sampling to support this determination. Current Human Exposures Under Control EI determinations are intended to reflect a reasonable conclusion by EPA or the State that current human exposures are under control with regard to the vapor intrusion pathway and current land use conditions. Therefore, if conducting evaluation for an EI determination, document that the **Pathway is Incomplete** and/or does not pose an unacceptable risk to human health for EI determinations.

*Are you making an EI determination based on modeling and does the model prediction indicate that determination is expected to be adequately protective to support Current Human Exposures Under Control EI determinations?*

*Yes*

*No*

*N/A*

*Do subslab vapor concentrations exceed target levels?*

*Yes*

*No*

*N/A*

Do indoor air concentrations exceed target levels?

Yes

No

**Conclusion**

**Is there a Complete Pathway for subsurface vapor intrusion to indoor air?**

Below, check the appropriate conclusion for the Subsurface Vapor to Indoor Air Pathway evaluation and attach supporting documentation as well as a map of the facility.

NO - the "Subsurface Vapor Intrusion to Indoor Air Pathway" has been verified to be incomplete for the PWNB facility, EPA ID # 000 791 681, located at 113 Wells St. No. Berwick. This determination is based on a review of site information, as suggested in this guidance, check as appropriate:

for current and reasonably expected conditions, or

based on performance monitoring evaluations for engineered exposure controls. This determination may be re-evaluated, where appropriate, when the Agency/State becomes aware of any significant changes at the facility.

YES -The "Subsurface Vapor to Indoor Air Pathway" is Complete. Engineered controls, avoidance actions, or removal actions taken include: \_\_\_\_\_

UNKNOWN - More information is needed to make a determination.

**Locations where References may be found:**

9-28-05 Memo To Tom LeBlond  
App D Final RFI Report Volume No 3  
Date: Nov 2006

**Contact telephone and e-mail numbers:**

(name) Joan M. Jones

(phone #) 207-287-7879

(e-mail) jam.m.jones@maine.gov