



RDMS DocID 106709

RCRA RECORDS CENTER  
FACILITY Rogers Corp  
NO. CTD018884833  
12-13  
106709

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: Rogers Corporation  
Facility Address: 730 Windham Road, South Windham, CT 06266  
Facility EPA ID #: CTD018884833

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).

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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> | <u>VOC concentrations exceed levels</u>                   |
| Air (indoors) <sup>2</sup>  | <u>   </u> | <u>X</u>   | <u>   </u> | <u>Indoor air concentrations do not exceed levels</u>     |
| Surface Soil (e.g., <2 ft)  | <u>X</u>   | <u>   </u> | <u>   </u> | <u>One sample exceeds the arsenic concentration level</u> |
| Surface Water               | <u>   </u> | <u>X</u>   | <u>   </u> | <u>Surface water concentrations do not exceed levels</u>  |
| Sediment                    | <u>X</u>   | <u>   </u> | <u>   </u> | <u>Cu, Ni, Zn, PAHs exceed levels</u>                     |
| Subsurf. Soil (e.g., >2 ft) | <u>   </u> | <u>   </u> | <u>X</u>   | <u>Unknown</u>  |
| Air (outdoors)              | <u>   </u> | <u>   </u> | <u>X</u>   | <u>No known releases, impacts not anticipated</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):**

Groundwater:

Unconsolidated-deposits aquifer

Fuss & O'Neill conducted one round of groundwater sampling at the site in July 2003. Groundwater samples were analyzed for PP13 metals, and VOCs (Method 8260). Three groundwater samples collected from the wells within the former landfill (PAOC-02) were also analyzed for SVOCs (Method 8270) and PCBs (Method 8080). For the shallow unconsolidated-deposit aquifer, VOCs were detected at MW-05, MW-07, MW-08, MW-10, and MW-11 (Table 1). MW-05 is located downgradient of the chemical storage area (PAOC-06). MW-07 is located downgradient of the former landfill (PAOC-02). MW-08 is located downgradient of the former drum storage area (PAOC-01). MW-10 and MW-11 are located downgradient of petroleum underground storage tanks (PAOC-05), drywells (PAOC-15), a septic system (PAOC-14), the sludge evaporation shed (PAOC-09), and a former degreasing still (PAOC-16).

PCE was detected in the deep unconsolidated-deposit aquifer in the sample collected from the cooling water supply well (PW-2). This constituent had been detected at similar concentrations in the well in a sampling event that occurred in 1980.

The highest concentrations of VOCs were detected in the shallow unconsolidated-deposits aquifer at MW-10. PCE was the most frequently detected VOC in the unconsolidated-deposits aquifer with detects reported for four of the twelve samples collected.

Bedrock aquifer

MEK was detected in the bedrock aquifer in the sample collected from the cooling water supply (PW-1). This constituent was not detected in any of the other samples collected at

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the site.

Fate and Transport

Migration of contaminated groundwater in the unconsolidated-deposit and bedrock aquifers is the dominant contaminant transport mechanism at the site. Groundwater in the unconsolidated-deposit aquifer flows to the southeast toward the Shetucket River and discharges to the river. Groundwater in the shallow bedrock aquifer likely flows southeast toward the river and appears to discharge to the river. Therefore, the Shetucket River is likely the receptor for the majority of the contaminant mass that is mobile and migrating with the site groundwater. Public or private supply wells were not identified within 1,000 feet of the site.

Exceedances

Table 2 lists contaminants above levels of concern and locations of exceedances based on one round of groundwater sampling that occurred July 2003. The PCE concentration in the sample collected from MW-10 exceeded the Connecticut Remediation Standard Regulation (RSR) Surface Water Protection Criteria. Exceedances of the RSR Residential Volatilization Criteria (RES VC) and/or Industrial Commercial Criteria (I/C VC) or the CTDEP proposed revisions to the RES VC and/or I/C VC occurred for the samples collected from MW-05 (1,1-DCE), MW-07 (vinyl chloride), and MW-10 (TCE).

Air (indoors): Indoor air concentrations were collected at five interior locations (Table 3) do not exceed the OSHA PEL eight-hour TWAs.

Surface Soil: Surface soil samples were collected from the former landfill (PAOC-02). The samples were analyzed for mass PP13 metals, VOCs, and ETPH. Four samples with the highest concentrations of ETPH were analyzed for SVOCs and PCBs.

Table 4 lists detected parameters and exceedances of the applicable Connecticut Direct Exposure Criteria (DEC) for surface soil. The concentration of arsenic in one sample exceeded the I/C DEC. The I/C DEC is used for comparison because PAOC-02 is located inside the facility fence and is not within a residential area.

Surface Water: Three surface water samples were analyzed for VOCs. VOCs were not detected in any of the samples submitted for laboratory analysis.

Sediment: Six sediment samples were analyzed for PP13 metals, VOCs, and SVOCs. A summary of detected analytical results are presented in Table 5. For evaluating the potential risk from contaminated sediment, the conservative screening-level performance standards used were the National Oceanic and Atmospheric Administration (NOAA) Screening Quick Reference Tables (SQuiRTs) and the RSR RES DEC. SQuiRT exceedances occurred for anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(ghi)perylene, benzo(k)flouranthene, bis(2-Ethylhexyl) phthalate, chrysene, fluoranthene, indeno(1,2,3-cd)pyrene, phenanthrene, pyrene, copper, nickel and zinc. Res DEC exceedances occurred for benzo(a)anthracene, benzo(a)pyrene, and indeno(1,2,3-cd)pyrene.

The SQuiRTs are ecological screening indicators of exposure risk to benthic organisms from contaminated sediment and so do not directly apply to human exposure risk. Based on the low concentrations of the metals (Cu, Ni, and Zn) that exceeded the SQuiRTs and because metals are generally more toxic to benthic organisms than they are to humans, it is our opinion that there is no human exposure risk from these constituents.

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The PAHs that exceeded the SQUIRTs and RES DEC are constituents commonly found in asphalt. The locations that had the highest concentrations of PAHs (SED-2 and SED-5) are located next to swales that receive stormwater runoff from the facility parking lots and likely contain pieces of asphalt. These swales only contain water during a storm event. Therefore, fish are not expected to be in these swales and will not be feeding on benthic organisms exposed to these sediments.

The fish that people catch in the river feed on benthic organisms. For the contaminants that did not exceed the SQUIRTs it can be concluded that because those contaminants do not pose a risk to benthic organisms, they do not pose a risk to human health. For the contaminants that exceeded the SQUIRTs, the food-chain risk evaluation was performed to determine the human health risk due to eating the fish that eat the benthic organisms. The risk of unacceptable human exposures to contaminated sediment via the consumption of fish from the river was assessed by using the analytical data for sediment samples collected at SED-1, SED-4, and SED-6.

The software package RISK\*ASSISTANT™ (Hampshire Research Institute, 1995) was used for this purpose. This software incorporates the use of bioaccumulation factors. The toxicity values employed included reference dose factors and carcinogenic slope factors from the EPA Region III Risk-Based Concentration Table (<http://www.epa.gov/reg3hwmd/risk/riskmenu.htm>). In the first assessment, the risk to area residents who consume fish that are caught on site was evaluated. In this analysis, it was assumed that a 70 kg adult would catch and eat 0.149 kg (0.33 lb) of fish from the site ten times per year for 10 years. It was further assumed that 100 percent of fish at the site are fully contaminated. The RISK\*ASSISTANT output is provided as Attachment A. This scenario results in a risk of 2 in 100,000 (2e-005) over background cancer incidence which is within EPA's generally acceptable range of 1 in 10,000,000 (1e-004) to 1 in 10,000,000 (1e-7).<sup>3</sup>

It should be noted that the Shetucket River is stocked with fish that are raised elsewhere. As a result, the fish that are caught in the area of the facility are expected to have lower concentrations of PAHs in their systems than those used to perform the risk evaluation. The exposure assumptions used in the Risk\*Assistant model; therefore, are very conservative.

Human Exposure Through Consumption of Sediment: For the Res DEC exceedances, it should be underscored that under the RSRs the human health-based DEC do not apply to sediment since the standard DEC exposure assumptions are not appropriate for sediment. The DEC should be regarded merely as a conservative screening tool. For the contaminants that did not exceed the Res DEC, it can be concluded that those contaminants do not pose a risk to human health. For the contaminants that exceeded the Res DEC, the risk of unacceptable human exposures to contaminated sediment via the consumption of the sediment was evaluated using exposure assumptions that are more appropriate to human contact with river sediments.

The assessment addressed the exposure of child and adult trespassers to river sediments on-site. Risk was calculated for a 15 kg child that trespasses twice per week during the fishing season (April to October) and ingests 100 mg of sediment per visit for six years. Risk was also calculated for a 70 kg adult who trespasses at the same frequency (60 times per year) and consumes 50 mg of sediment for 24 years. Sediment locations SED-2, SED-3, and SED-5 are located within stormwater swales, not in the river itself; therefore, the analytical results for sediments collected at these locations were not included in the assessment. As noted above, fish are not expected to be present in these swales. Since

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the anticipated exposure to trespassers is attributed to time spent fishing in the river, it is not expected that trespassers will be coming into contact with the sediments in the swales.

The childhood exposure scenario resulted in a risk of 3 in 10,000,000 (3e-007) over background cancer incidence, and the adult exposure resulted in a risk of 1 in 10,000,000 (1e-007) over background, for a total risk of 4 in 10,000,000 (4e-007) posed to repeated trespassers at the site. This scenario is below EPA's generally acceptable range of 1 in 10,000(1e-004) to 1 in 10,000,000 (1e-7)<sup>3</sup>; therefore, with these contaminant concentrations and the assumed human sediment-consumption exposure conditions, there is no significant risk to human health posed by the Shetucket River sediments at the Rogers site.

Subsurface Soil: There are no known releases to subsurface soil, and impacts to subsurface soil from facility operations are not anticipated.

Air (outdoors): There have been no known releases to outdoor air, and outdoor air impacts from facility operations are not anticipated.

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.

<sup>3</sup> EPA/5401-89/002 Risk Assessment Guidance for Superfund Volume I Human Health Evaluation Manual (Part A), USEPA, Office of Emergency and Remedial Response. Washington, D.C. December 1989.

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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)

| <u>"Contaminated" Media</u>   | Residents | Workers    | Day-Care  | Construction | Trespassers | Recreation | Food <sup>3</sup> |
|-------------------------------|-----------|------------|-----------|--------------|-------------|------------|-------------------|
| Groundwater                   | <u>No</u> | <u>No</u>  | <u>No</u> | <u>No</u>    |             |            | <u>No</u>         |
| Air (indoors)                 |           |            |           |              |             |            |                   |
| Soil (surface, e.g., <2 ft)   | <u>No</u> | <u>Yes</u> | <u>No</u> | <u>Yes</u>   | <u>Yes</u>  | <u>No</u>  | <u>No</u>         |
| <del>Surface Water</del>      |           |            |           |              |             |            |                   |
| Sediment                      | <u>No</u> | <u>Yes</u> |           |              | <u>Yes</u>  | <u>Yes</u> | <u>Yes</u>        |
| Soil (subsurface e.g., >2 ft) |           |            |           | <u>No</u>    |             |            | <u>No</u>         |
| Air (outdoors)                | —         | —          | —         | —            | —           | —          | —                 |

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 following page

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

Rationale and Reference(s): (\*) brief description of basis for response for each pathway is provided below:

**Residents via "contaminated":**

-*Groundwater* = No, a pathway for human exposure to groundwater contaminated above levels of concern does not exist at the site. The groundwater classification at the site is GB (groundwater may be not be suitable for human consumption without treatment). Private residences within a 1,000 feet radius of the site are connected to the Windham Water Works Company public water supply.

-*Soil (surface)* = No complete pathway - The only surface soil contamination is on-site, and no residences are on

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site.

**Workers via "contaminated":**

*-Groundwater* = No, a pathway for human exposure to groundwater contaminated above levels of concern does not exist. The facility supply wells are contaminated with low concentrations of PCE and MEK. The on-site supply wells are used for non-contact cooling water and to provide water to the plant heating system. The water is kept separate from the plant's potable water supply which is supplied by the Windham Water Works public water supply mains. Therefore, there is no potential for worker exposure during normal operation of the system. Water is not pumped from the wells during plant maintenance activities. Therefore, there is no potential for worker contact during system maintenance.

*-Soil (surface)* = Yes, a pathway for human exposure exists to surface soil above levels of concern. The one sample that exceeds the I/C DEC (arsenic) was collected from PAOC-02 (former landfill). The sampling location is in the northwest portion of the landfill in the vicinity of a CL&P utility easement for an overhead power line and within 100 feet of the Central Vermont Railroad line (Figure 2). Although workers for the Rogers Corporation do not typically enter the area of the former landfill as part of daily operations, there is a potential that workers from the utility company or railroad could enter this area during maintenance of the power lines and railroad grade. There are no barriers preventing workers from entering this area.

*-Sediment* = Although a pathway for human exposure to sediments in the stormwater outfalls and river exists, it should be noted that there are no job responsibilities that would cause workers at the facility to come into contact with the sediments and therefore this is not considered to be a significant exposure pathway and worker exposure to sediments is not assessed.

**Day-Care (or other non-production and possibly sensitive receptor uses (e.g., schools, hospitals, etc.)) via "contaminated":**

*-Groundwater* = No complete pathway. No day care or other sensitive uses (e.g., schools, hospitals, etc.) can be reasonably expected near the contaminated groundwater plume, and these receptors are not expected to have other contact with contaminated groundwater.

*-Soil (surface)* = No complete pathway. No day care or other sensitive uses can be reasonably expected near contaminated soil.

**Construction (workers) via "contaminated":**

*-Groundwater* = No complete pathway. Depth to groundwater at the site ranges from 9 to 18 feet below the ground surface. No construction at this depth below the ground surface is planned or anticipated.

*-Soil (surface)* = Yes, a pathway for human exposure to contaminated shallow soil exists. A railroad line and overhead power line are located in the vicinity of PAOC-02 at the southwest boundary of the site. No construction in areas of contamination is planned or anticipated. However, construction workers may enter PAOC-02 during maintenance of the railroad line and overhead power line.

*-Soil (subsurface)* = No complete pathway. No construction in the subsurface is planned or anticipated.

**Trespassers via "contaminated":**

*-Soil (surface)* = Yes, a pathway for human exposure to contaminated shallow soil exists. There are no barriers preventing trespassers from entering the former landfill (PAOC-02).

*-Sediment* = Yes, a pathway for human exposure to contaminated sediments exists.

**Recreation (users) via "contaminated":**

*-Soil (surface)* = No complete pathway. Recreational users are not expected within PAOC-02 and there are no future plans for recreational activities in this area.

*-Sediment* = Yes, a pathway for human exposure to contaminated sediments exists.

**Food contaminated via:**

*-Groundwater* = No complete pathway. No food items are produced/grown in contact with "contaminated" groundwater.

*-Soil (surface)* = No complete pathway. No food items are produced/grown in contact with "contaminated" surface

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soil (e.g., no foods are produced on-site).

-*Soil (subsurface)* = No complete pathway. No food items are produced/grown in contact with "contaminated" subsurface soil (e.g., no foods are produced on-site).

-*Sediment* = Yes, a pathway for human exposure to contaminated sediments via the food chain exists. The Shetucket River is stocked for fishing season. The fish eat benthic organisms in the sediment. Fish that are caught may be eaten.

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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)?

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):**

-Soil (surface) = Complete pathways were identified in #3 for the categories of Workers, Construction and Trespassers. The exceedance for surface soil identified in #2 consisted of one sample exceeding the I/C DEC for arsenic. A screening level assessment of human health risk attributed to exposure to this soil was conducted using RISK\*ASSISTANT. Potential human receptors were identified as utility and construction workers as well as adult and child trespassers. All adult scenarios assumed 70 kg body weight, 70 years lifetime, and 30 years exposure. The utility worker scenario assumes one day exposure per year with 500 mg soil ingested; the construction worker scenario assumes 5 days per week for six months with 500 mg soil ingested per day; and the adult trespasser assumes one hour per day, 5 days per week, April through October with 50 mg soil ingested each day. The child trespasser scenario assumes 15 kg body weight, 6 years exposure for one hour per day, 5 days per week, April through October with 100 mg soil ingested each day.

Two exposure point concentrations were used for this assessment: the maximum concentration reported (66 mg/Kg) and the average of the reported soil concentrations (4.6 mg/Kg). Using the maximum concentration is a very conservative approach since only one of 18 samples was reported to have arsenic present above the DEC. Calculated risk for each potential receptor is:

| Receptor            | Maximum Concentration     | Average Concentration     |
|---------------------|---------------------------|---------------------------|
| Utility Worker      | < 1 in 1,000,000 (8e-007) | < 1 in 1,000,000 (6e-008) |
| Construction Worker | 1 in 10,000 (1e-004)      | 8 in 1,000,000 (8e-006)   |
| Adult Trespasser    | 1 in 100,000 (1e-005)     | < 1 in 1,000,000 (9e-007) |
| Child Trespasser    | 2 in 100,000 (2e-005)     | 2 in 1,000,000 (2e-006)   |

With the exception of the construction worker, these estimated risks using the maximum concentration are generally within the acceptable limits defined by the EPA (less than 1 in 10,000)<sup>5</sup>. Since the assessment was conducted using the maximum reported concentration, the estimated risks are likely overly conservative. Using the average concentration, which is a more realistic exposure scenario, all estimated risks are below EPA's acceptable limits; therefore, there is likely no significant risk to human health posed by surficial soil in the area of the former landfill.

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<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.

<sup>5</sup> EPA/540/1-89/002 Risk Assessment Guidance for Superfund Volume I Human Health Evaluation Manual (Part A), USEPA, Office of Emergency and Remedial Response. Washington, D.C. December 1989.

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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):

**Not Applicable**

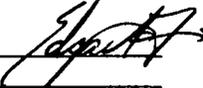
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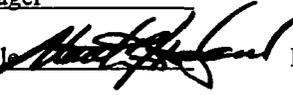
6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

**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 Rogers Corporation facility, EPA ID # CTD018884833, located at 730 Windham Road, South Windham, 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) Signature on File  Date 4/21/04  
(print) Edgar A. Davis  
(title) RCRA Facility Manager

Supervisor (signature) Signature on File  Date 4/21/04  
(print) Matt Hoagland  
(title) Chief, RCRA Corrective Action Section  
(EPA Region or State) Region 01

Locations where hardcopy References may be found:

Rogers Corporation (One Technology Drive, Killingly, CT)  
Connecticut Dept. of Environmental Protection-File Room-79 Elm St., Hartford, CT  
USEPA Region 1 Offices, 90 Canal Street, Boston, MA

Contact telephone and e-mail numbers

(name) Edgar A. Davis  
(phone #) 617.918.1379  
(e-mail) davis.edgar@epa.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.**

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