

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

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



Current Human Exposures under Control

RDMS DocID

106729

Facility Name: Solutia Inc., Indian Orchard Plant
 Facility Address: Springfield, MA
 Facility EPA ID #: MAD001114818

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).

RCRA RECORDS CENTER
 FACILITY Solutia Inc
 I.D. NO. MAD001114818
 FILE LOC. R-13
 OTHER #106729

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2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”** 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)?

Media	Yes	No	?	Rationale/Key Contaminants
Groundwater	X			Chlorobenzene was the constituent most frequently detected above GW-2 Reportable Concentrations (RCs) and MCP GW-3 criteria for discharge to surface waters. Other VOC and SVOC exceedence are shown below.
Air (indoors) ²		X		There are no sources of VOCs in unsaturated soils near or within 100 feet of a building. At two near-building locations groundwater concentrations exceeded MADEP GW-2 standards. However, the soil vapor concentrations at these locations were below generic screening criteria for soil vapor as presented in the Vapor Intrusion Guidance (USEPA, 2001).
Surface Soil (e.g., < 2ft)	X			Some PAHs, 2,4,5-Trichlorophenol, and PCB Aroclor 1242 were reported above S2-GW-2 and/or S2-GW-3 standards.
Surface Water		X		Inorganics, a few VOCs (including chlorobenzene), and one SVOC were detected in surface water of the Chicopee River. The maximum detected concentrations of constituents in surface water of the Chicopee River are less than available USEPA (2002) Ambient Water Quality Criteria (AWQC) for protection of human health. For Bircham Bend Brook, PCB Aroclor 1260 was the only constituent detected (0.00019 mg/L), above the AWQC for human health (6.4 x 10 ⁻⁸ mg/L PCBs). As subsequently discussed, this concentration is not likely to be of concern as it was only detected in one sample (from a culvert above the Brook) at a very low estimated concentration. In addition, the AWQC is also low and not generally quantifiable.
Sediment	X			In accordance with MADEP (1995) guidance, sediment data were conservatively compared to MADEP soil criteria. Indeno(1,2,3-cd) pyrene was reported in one sediment sample of the Chicopee River above MADEP S-1(GW-3) soil standards. PAHs were also reported above MADEP S-1(GW-3) criteria in two sediment samples collected from Bircham Bend Brook. The sources of PAHs are attributed to coal ash or coal combustion.
Subsurface Soil	X			A few VOCs, SVOCs, and inorganics were reported in subsurface soils of the waste disposal areas (SWDA No. 1 and LWDA No. 1) above MADEP S-3 (GW-2) and S-3 (GW-3) criteria.
Air (outdoors)		X		A comparison of calculated air EPCs (dust) to Ambient Air Quality Standards indicates that concentrations of compounds potentially released to air as dust do not exceed these levels (BBL, 1996).

_____ 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.

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Groundwater

Chlorobenzene was the constituent most frequently detected in groundwater above MADEP MCP Reportable Concentrations (RCs) and above MADEP MCP GW-3 standard established for groundwater discharge to surface water. Other constituents detected above the GW-2 RCs are shown below.

Inorganics in unfiltered groundwater were below the method quantitation limit or below the MCP RCs and GW-3 standards when sampled using low flow techniques.

Compound	MADEP Reportable Concentration for GW-2	Total No. of Times Compound Sampled and Analyzed	Total No. of Times Compound Detected	Total No. Exceed RCGW2	Detected Concentration Range (mg/L)
VOLATILE ORGANIC COMPOUNDS					
Chlorobenzene	0.5	566	194	87	0.001 to 42
Vinyl chloride	0.002	568	53	37	0.001 to 4.7
Ethylbenzene	4	570	62	11	0.001 to 26
1,2-Dichloroethane	0.02	568	26	4	0.001 to 0.12
Styrene	0.9	562	19	3	0.001 to 27
1,2-Dichloropropane	0.009	568	18	3	0.001 to 0.036
Trans-1,3-Dichloropropene	0.005	568	1	1	0.001 to 0.029
Benzene	2	568	133	1	0.001 to 0.21
INORGANICS					
Cadmium	0.01	89	28	15	0.01 to 0.07
Silver	0.007	88	9	8	0.01 to 0.05
Nickel	0.08	77	29	7	0.01 to 2.8
Cyanide, Total	0.01	75	5	5	0.01 to 0.5
Lead	0.03	89	36	4	0.01 to 4.1
Mercury	0.001	88	6	2	0.001 to 0.005
Arsenic	0.4	89	39	1	0.003 to 1.2
Beryllium	0.05	77	6	1	0.01 to 0.06
Chromium	2	89	32	1	0.01 to 4.2
Vanadium	2	44	24	1	0.5 to 4.8
Zinc	0.9	76	52	1	0.01 to 15

Notes:

RCGW2 = Reportable Concentration Groundwater-2 from Table 1 of the Massachusetts Oil and Hazardous Material List in Section 310 CMR: Department of Environmental Protection (effective 5/15/98).

Total No. of Times Compound Sampled and Analyzed" includes all detected and undetected results.

Total No. of Times Compound Detected" includes all results that were above the quantitation detection limit.

Exceed RCGW2" is a count of samples that exceeded the RCGW-2 criteria for the constituent.

Indoor Air

There are no sources of VOC in unsaturated soils near or within 100 feet of a building. Seven buildings were identified as occupied or potentially occupied by 8-hour workers beneath or within 50 feet of a VOC plume extent in groundwater. Although there are two locations where groundwater concentrations exceeded MADEP GW-2 standards near a building, the soil vapor concentrations at these locations are below generic screening criteria for soil vapor in the USEPA (2001) Vapor Intrusion Guidance. Thus, according to Figure 2 of the Vapor Intrusion guidance, there is an incomplete subsurface vapor to indoor air pathway.

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VOCs in Groundwater and Soil Gas – Potential for Migration to Indoor Air

Area	Potential Occupied Building	Nearby Monitoring Wells	Approx. Depth to Groundwater (feet)	VOC	Conc. in Shallow Groundwater (mg/L)	Soil Vapor Point	Conc. in Soil Vapor (ug/m ³)	Vapor Intrusion Guidance Values (ug/m ³)
WWII NR	Building 96	MW-116S	6	Chlorobenzene	34	SV-4	3.9	2000
WWII NR	Building 100	MW-106S	7	Chlorobenzene	0.061	SV-1 (east)	31	2000
		MW-107S	13		4.2	SV-2 (north)	ND (3.9)	2000
		MW-110S	10		0.16	SV-3 (north)	ND (4.1)	2000
WWII NR	Building 61	MW-110S		Chlorobenzene	0.16	SV-3	ND (4.1)	2000
FGHA	Building 89	MW-94S	6	Vinyl Chloride	0.0012	NA	NA	230
FGHA	Building 81	MW-96SF	4	Vinyl Chloride	0.018	NA	NA	230
SWDA No. 1	Building 97	MW-52S and MW-12S	18	Chlorobenzene	0.2 (projected based on contour)	NA	NA	2000
SWDA No. 1	Building 99	MW-72S and MW-73S	9	Chlorobenzene	0.66	NA	NA	2000
SWDA No. 1	180 Gate House	Between MW-73S and MW-46S	15	Chlorobenzene	0.001 (projected based on contour)	NA	NA	2000

Notes:

NA- Not available

ND (4.1) - Not detected above detection limit in parentheses.

Shaded = concentration above MCP Method 1 GW-2 groundwater standard of 1 mg/L for groundwater to indoor air.

Vapor intrusion values are from Table 2 of the USEPA (2001) Supplemental Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway.

Surface Soil

The constituents listed below were detected in surface soils (0 – 0.5 feet) above S-2 (GW-2) and S-2 (GW-3) standards.

Constituents in Soil Greater than MADEP S-2 (GW-2) and S-2 (GW-3) Criteria

Constituent	Depth (feet)	Area	Maximum Concentration (mg/kg)	MADEP S-2 (GW-2)
Benzo(a)anthracene	0-0.5	Fiberloid Landfill	1.4	1
Benzo(a)pyrene	0-0.5	Fiberloid Landfill	1.3	0.7
Benzo(b)fluoranthene	0-0.5	Fiberloid Landfill	1.6	1
Aroclor 1242	0-0.5	SWDA No. 2	5.5	2

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Constituent	Depth (feet)	Area	Maximum Concentration (mg/kg)	MADEP S-2 (GW-3)
Benzo(a)anthracene	0-0.5	Fiberloid Landfill	1.4	1
Benzo(a)pyrene	0-0.5	Fiberloid Landfill	1.3	0.7
Benzo(b)fluoranthene	0-0.5	Fiberloid Landfill	1.6	1
2,4,5-Trichlorophenol	0-0.5	Northern Building 99 Leach Field	15	2

Surface Water

The maximum detected concentration of constituents in surface water collected from Bircham Bend Brook and the Chicopee River are shown below and are less than available USEPA (2002) Ambient Water Quality Criteria for the protection of human health (based on consumption of organisms). The only exceptions are PCB Aroclor 1260, which was reported in one water sample above its respective AWQC value, and arsenic, which was detected once out of 14 samples. The water sample containing PCB was collected from a culvert above the Brook, and as such is not representative of surface water concentrations within the Brook. Furthermore, this exceedence is not likely to be of concern as the detected concentration is very low (and based on an estimated concentration). In addition, the AWQC for PCBs is also low and generally is not quantifiable using standard analytical laboratory practices.

Detected Constituents in Surface Water - Bircham Bend Brook

Constituents	Maximum Detected Concentration (mg/L)	Frequency of Detection	Ambient Water Quality Criteria, 2002 (mg/L) (consumption of organisms)
Arsenic	0.009	1/14	0.00014
Barium	0.537	11/14	--
Copper	0.199	3/14	--
Iron	22.3	14/14	--
Magnesium	7.02	12/12	--
Manganese	5.87	14/14	--
Potassium	6.57	6/6	--
Sodium	78.6	8/8	--
Aroclor-1260*	0.00019	1/8	6.40E-08

* Sample collected from culvert discharging to Bircham Bend Brook.

Detected Constituents in Surface Water - Chicopee River

Constituent	Maximum Detected Concentration (mg/L)	Frequency of Detection	Ambient Water Quality Criteria, 2002 (mg/L) (consumption of organisms)
Aluminum	0.416	4/10	--
Antimony	0.0079	1/6	0.64
Barium	0.083	11/11	--
Calcium	11.6	4/11	--
Chromium	0.041	5/11	--
Cobalt	0.016	3/9	--
Copper	0.017	1/10	--

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Constituent	Maximum Detected Concentration (mg/L)	Frequency of Detection	Ambient Water Quality Criteria, 2002 (mg/L) (consumption of organisms)
Iron	0.919	1/11	--
Lead	0.02	5/11	--
Magnesium	6.18	11/11	--
Manganese	0.107	11/11	--
Nickel	0.031	5/11	4.6
Potassium	3.87	10/11	--
Sodium	18.1	11/11	--
Zinc	0.012	4/10	26
2-Butanone	0.01	4/10	--
Acetone	0.021	5/10	--
Chlorobenzene	0.005	1/6	1.6
Chloroform	0.005	9/11	0.47
Methylene chloride	0.008	10/11	--
Styrene	0.005	1/6	--
Di-n-octyl phthalate	86	1/7	--

Subsurface soil

The constituents listed below were detected in subsurface soils/wastes of Solid Waste Disposal Area (SWDA) No. 1 and Liquid Waste Disposal Area (LWDA) No. 2 at concentrations greater than MADEP S-3 (GW-2) and S-3 (GW-3) criteria.

Constituents in Subsurface Soil/Wastes Greater than MADEP S-3 (GW-2) and S-3 (GW-3) Criteria within Landfill

Constituent	Depth (feet)	Area	Maximum Concentration (mg/kg)	MADEP S-3 (GW-2) (mg/kg)
Antimony	(26-28)	SWDA No.1	120	40
Arsenic	(10-14)	SWDA No.1	120	30
Lead	(34-36)	LWDA No. 1	780	600
Bis(2-ethylhexyl)phthalate	(26-28)	SWDA No.1	1800	1000
1,2-Dichloroethane	(34-36)	LWDA No. 1	61	0.2
Ethylbenzene	(34-36)	SWDA No.1	6000	2500
Styrene	(34-36)	LWDA No. 1	3600	20
Toluene	(34-36)	LWDA No. 1	510	500
Xylenes, Total	(10-14)	SWDA No.1	18000	500

Constituent	Depth (feet)	Area	Maximum Concentration (mg/kg)	MADEP S-3 (GW-3) (mg/kg)
Antimony	(26-28)	SWDA No. 1	120	40
Arsenic	(10-14)	SWDA No. 1	120	30
Lead	(34-36)	LWDA No. 1	780	600

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Constituent	Depth (feet)	Area	Maximum Concentration (mg/kg)	MADEP S-3 (GW-3) (mg/kg)
Bis(2-ethylhexyl)phthalate	(26-28)	SWDA No. 1	1800	500
Diethyl phthalate	(34-36)	LWDA No. 1	160	0.7
1,2-Dichloroethane	(34-36)	LWDA No. 1	61	60
Chlorobenzene	(34-36)	LWDA No. 1	51	40
Ethylbenzene	(10-14)	SWDA No. 1	6000	500
Styrene	(34-36)	LWDA No. 1	3600	100
Xylenes, Total	(10-14)	SWDA No. 1	18000	2500

Sediment

Constituents listed below were reported in sediment of Bircham Bend Brook and the Chicopee River at concentrations greater than MADEP S-1 (GW-3) standards.

Constituents in Sediment of Bircham Bend Brook Greater than MADEP S-1 (GW-3) Criteria

Constituent	Maximum Concentration (mg/kg) Sample GB-6	Maximum Concentration (mg/kg) Sample GB-7	MADEP S-1 (GW-3) (mg/kg)
Benzo(a)anthracene	0.75	--	0.7
Benzo(a)pyrene	1.4	0.74	0.7
Benzo(b)fluoranthene	3.6	--	0.7

Constituents in Sediment of the Chicopee River Greater than MADEP S-1 (GW-3) Criteria

Constituent	Maximum Concentration (mg/kg) Sample CR-1-S	MADEP S-1 (GW-3) (mg/kg)
Indeno(1,2,3-cd)pyrene	0.71	0.7

Air (outdoors)

As stated in Section 6.2.3 of the Phase II Comprehensive Site Assessment Risk Characterization (BBL, 1996), calculated exposure point concentrations for dust were less than Ambient Air Quality Standards.

Rationale and Reference(s):

BBL, 1996. *RCRA Facility Investigation (RFI) Risk Assessment/MCP Phase II Comprehensive Site Assessment Risk Characterization*. Monsanto Company Indian Orchard Plant, Springfield, Massachusetts. September, 1996.

USEPA, 2001. *Draft Supplemental Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway*.

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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)							
“Contaminated” Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food
Groundwater	No	No	No	No	No	No	No
Air (indoors)							
Soil (surface, e.g., <2 ft)	No	Yes	No	Yes	Yes	No	No
Surface Water							
Sediment	No	Yes	No	No	Yes	Yes	No
Soil (subsurface, e.g., >2 ft)	No	No	No	No	No	No	No
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. For Media which are not “contaminated” as identified in #2, please strike-out specific Media, including Human Receptors’ spaces, or enter “N/C” for not contaminated.
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 assigned spaces in the above table. 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).
- X 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

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Rationale and Reference(s):

Groundwater - no complete exposure pathway for human receptors.

Groundwater at the site is not used as a potable source. The Indian Orchard Plant is supplied with public water.

There are no known groundwater users within a 1.2 mile radius of the plant. The surrounding properties use the city of Springfield public water supply. The nearest aquifer that could be potentially productive is located 1.2 miles hydraulically upgradient of the Indian Orchard Plant (according to MA DEP GIS 21E maps, MA DEP, 1997) (BBL, 2001).

City of Springfield and surrounding areas obtain their water from municipal water supply system originating from Cobble Mountain Reservoir, Quabbin Reservoir, or Springfield Reservoir at distances ranging from 6 to 20 miles hydraulically upgradient of the site (BBL, 2001). Therefore, off-site potable use of groundwater is not occurring nor is it likely to occur in the future.

Groundwater discharges to the Chicopee River which acts as a local groundwater divide. Therefore, effects on off-site groundwater are unlikely.

Surface Soil - the exposure pathway is potentially complete for workers, construction workers, and trespassers. These receptors may be exposed to constituents in surface soil via direct contact (e.g., incidental ingestion and dermal contact).

Subsurface Soil - no complete exposure pathway for human receptors.

Although COCs are present in subsurface soils, they are generally present in waste disposal areas where there is no potential for exposure. The only hypothetical receptor that would be considered under a future use scenario would be a construction worker/excavator. However, in accordance with MADEP guidance, an Activity and Use Limitation (AUL) will be implemented that will preclude excavation activities in these areas.

Sediment - the exposure pathway is potentially complete for on-site workers, trespassers, and recreational users. On-site workers and trespassers may be exposed to constituents in sediment in Bircham Bend Brook and recreational users may be exposed to sediment in the Chicopee River.

BBL, 2001. On-Site Environmental Risk Characterization Report for RTN-1-0184. Solutia Inc., Indian Orchard Plant, July 2001.

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”** (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):

Surface Soil – *The Phase II Comprehensive Site Assessment Risk Characterization* (BBL, 1996), concluded that cancer risks and non-cancer hazard indices associated with current worker exposure to surface soils at the site are less than 1×10^{-5} and 1, respectively. As such, it was concluded that there is no significant human health risk associated with constituents in surface soils. Because trespassers are likely to be exposed to surface soils to a lesser degree than workers, risks/hazards associated with potential trespasser exposure are also not likely to be of significant concern.

Sediments – Some constituents in sediment of the Chicopee River and Bircham Bend Brook are greater than the MADEP S-1 (GW-3) standards. In accordance with MADEP (1995) guidance, constituents in sediment were initially evaluated the same as soil (i.e., comparison to MCP soil criteria). However, because exposure to sediment is likely to be less than soil (generally water-covered), comparison to soil criteria is overly conservative. These soil values are also likely to over-estimate potential sediment-related risks as exposure to water is likely to limit exposure (e.g., remove or limit sediment contact with skin).

BBL, 1996. *RCRA Facility Investigation (RFI) Risk Assessment/MCP Phase II Comprehensive Site Assessment Risk Characterization, April 1996.*

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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, go to question 6.

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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 Indian Orchard Solutia Facility, EPA ID # MAD001114818, located at 730 Worcester, MA, 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: Raphael J. Cody 9-14-04
(signature) Date
RAPHAEL CODY
(print)
RCRA FACILITY MANAGER
(title)

Supervisor Mark Hoagland 9/20/04
(signature) Date
Mark Hoagland
(print) Chief, RCRA Corrective Action Section
EPA Region I

Locations where References may be found:

Solutia Inc.
Indian Orchard Plant
730 Worcester Street
Springfield, MA 01151

Contact telephone and e-mail numbers

(name): Roy P. Hart
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