RCRA RECORDS CENTER
FACILITY General Electric Co
I.D. NO. CTD000842492
FILE LOC. R-13
OTHER 4783

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: GE Waste Water
Facility Address: 41 Woodford Ave, Plainville, CT 06062
Facility EPA ID #: CTD000842492

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).

RDMS Doc ID 4783

REFERENCES

Draft final RCRA Preliminary Assessment, June 1986.
Final Preliminary Assessment, September 22, 1989.
Site Characterization Workplan, Plainville Lagoon and Pipeline, October 1991.
Letter to John Podgurski from GE, regarding meeting, plans, status of GE remediation efforts, 11-11-92.
Closure Plan For An Abandoned Effluent Pipeline, GE Electrical Distribution & Control, 2-93.
Soil Sampling and Analysis Plan, Former Effluent Pipeline, June 1994.
Summary of Remediation Efforts For Surface Impoundments and Waste Pile Units, April 1997.
Part 1 Closure Plan, Former Effluent Pipeline, April 1999.
Quality Assurance Project Plan, Part 1 Closure Plan, Former Effluent Pipeline, November 1999.
Letter of Transmittal, from D. M. Downie to CTDEP, re: soil sample results, pipeline, 5-25-01.
Draft Environmental Indicator, prepared by GE, 7/8/02.
Letter re: Requested Attachments (1 and 2) for EI and Pipeline Study Data, July 26, 2002.
Revised Task Work Plan for Soil/Source, Groundwater, and Sediment Sampling, GE Company, 8-5-02.
2002 Annual Groundwater Monitoring Report, March 4, 2003.
Letter from B. Fuller, GE, to B. Brackett re: soil and water sample results from surface impoundment, 4-23-03.
Letter from B. Fuller, GE, to B. Brackett re: Quinnipiac River Sediment Samples, 9-9-03.

SITE HISTORY

The GE facility in Plainville consists of three separate facilities, the North Plant, the South Plant, and the Wastewater Pipeline and Treatment Plant. Each of these facilities have been assigned a separate EPA ID number. Currently, GE manufactures circuit breaker enclosures and switchboard power breakers at the North Plant facility. The South Plant is the corporate headquarters for industrial systems at GE. **This EI determination concerns only the 1,800 foot long Pipeline and Wastewater Treatment Plant (WWTP).**

There has been a manufacturing facility located at 41 Woodford Ave since 1899, and GE has operated at the site since 1952. From 1952 until 1985, GE conducted metal finishing operations, including electroplating, the application of protective coatings to metal surfaces, and solvent degreasing at the North Plant. Metal finishing wastewater was discharged to the South Plant where it was pretreated prior to discharge through an underground pipeline to the WWTP, which is located on Milford Street adjacent to the Quinnipiac River, approximately 0.34 miles southeast of the South Plant.

Process wastewater required treatment prior to discharge to the Quinnipiac River under a NPDES permit. Wastewater from the various plating processes were collected and pretreated. The treated wastewater and associated floc were transported to the lagoons via the pipeline. The most significant upgrade of the system occurred in 1976 when four lined sludge drying beds were constructed to replace the previous single unlined drying bed.

The WWTP area is approximately 5 acres in size. Beginning in the 1950's, it was operated as a primary sewage treatment plant by the Trumbull Electric Company. In the mid 1960's, GE began using the WWTP as a metal hydroxide settling lagoon and dewatering operation. Metal hydroxide sludge was removed from settling ponds on a regular basis and transferred to four lined sludge drying beds for dewatering. After dewatering, the sludge was removed and disposed of in an off-site landfill. In 1985, electroplating operations were discontinued at the North Plant, and in 1987 the North Plant was connected to the municipal sewer system. Closure and removal of the settling ponds and sludge drying beds at the WWTP began in 1989.

The five unlined settling lagoons were all approximately 4.5 feet deep, and varied from about 3,000 to 6,000 square feet in size. The lagoons were connected in series by 16 inch diameter pipe. Wastewater flowed sequentially through the five lagoons, and the clarified supernatant liquid discharged from lagoon 5 to the Quinnipiac River. The four lined sludge drying beds were each approximately 3 feet deep and 3,000 square feet in size. Dikes surrounded the beds, which were underlain by a clay liner.

The pipeline was constructed in 1975 and extends from the South Plant in a southeast direction beneath Woodford Ave, and turns to the southwest beneath Woodland Street to the end of the street where it intersects Milford Street

and Locust Street. **This author has been unable to determine how wastewater was transported from the GE plant to the WWTP area prior to installation of the current pipeline. Although not critical to this EI, this gap in understanding of historical operations should be researched as part of the RFI.** Pretreated effluent flowed by gravity to the surface impoundments through the 12 inch extra strength glazed vitrified clay pipeline. Reported discharge to the impoundments ranged up to 266,000 gallons per day. The pipeline lies at depths of between 4 and 7 feet below the paved roadway, which lies above the 100 year flood plain. Portions of the lagoon lie within the 100 year floodplain. Storm water runoff in the roads along the pipeline route flows to catch basins and through storm sewer pipes to the Quinnipiac River. Solids conveyed through the pipeline were F006 wastes considered toxic due to its potential to contain cyanide, cadmium, chromium, lead nickel, and silver.

SITE SETTING

The WWTP facility is located in a highly populated area, with approximately 10,000 people living within a mile. Land use along Woodford Ave is commercial and industrial. Along Woodland Street, land use is residential. The lagoon area is located at the southeast corner of the intersection of Woodland, Locust, and Milford Streets in a residential area. To the north, the lagoon area is bounded by a sidewalk which extends across the Quinnipiac River to the east. The tennis courts and parking lots of Plainville High School are adjacent to the south boundary of the lagoon area and eight residential lots form the western boundary. The lagoon area lies within 75 feet of the River. Currently, the lagoon area continues to drain surface water runoff to the Quinnipiac River. Runoff from offsite properties to the west of the lagoon enters the lagoon area as sheet flow and crosses the site in a west to east direction, where a 12 inch PVC pipe carries runoff through the berm to the river. Access to the lagoon area is restricted by a 6 foot chain link fence which surrounds the lagoon. Signs along the pedestrian walkway north of the site and on the south side near the high school parking lot post the site and identify it as a hazardous area.

The local geology consists of approximately 200 feet of surficial glacial deposits consisting of approximately 25 feet of surficial medium to coarse grained sands which are underlain by an approximately 20 feet of silt and clay, which in turn overlies sand. Bedrock beneath the site is the New Haven Arkose, a sedimentary rock consisting of arkosic sandstone, siltstone, and shale. The clay deposits act as an aquitard between the upper and lower water bearing zones. Comparison of groundwater levels from wells screened in the upper and lower water bearing zones indicate an upward vertical hydraulic gradient. The direction of groundwater flow in the upper water bearing zone is southeast toward the Quinnipiac River. Groundwater flow is to the east in the deeper overburden.

Groundwater in the vicinity of the pipeline is classified as GA. Shallow groundwater flow is southeast toward the Quinnipiac River, which is classified as C/B. In the vicinity of the site, the river is too shallow to make swimming or boating practical. The Quinnipiac River flows southerly approximately 56 miles to New Haven Harbor. The GE plant and nearby properties are serviced by municipal water. The nearest public well field is located east of the Quinnipiac River, approximately 2,000 feet upgradient of the pipeline. A private well survey conducted in April 1999 identified 21 properties within a half mile of the pipeline which are not listed as customers of the private water company for the Plainville area. It is assumed these properties are serviced by private drinking water wells. Based on the location of the pipeline and lagoon, and groundwater flow direction, these private wells are likely upgradient of groundwater contamination in the lagoon.

SITE INVESTIGATIONS AND REMEDIATION

The surface impoundments and sludge drying beds (lagoons) and pipeline are regulated units and therefore subject to closure requirements. In August 1985, GE signed a Consent Order with CTDEP to conduct closure of the WWTP.

LAGOONS

In 1982, Dames and Moore completed a hydrological investigation of the lagoons. The investigation included the installation and sampling of 6 shallow monitoring wells (MW-101 through MW-106), and surface water samples from upstream and downstream locations in the Quinnipiac River. Several metals (barium, cadmium, lead, and chromium) and VOCs (methylene chloride, chloroform,) were detected in at least one well at levels above the GWPC. Total VOCs were measured at 8.4 ppb at an upstream location in the Quinnipiac, and 56 ppb at a downstream location. The study also concluded that releases of cadmium were occurring to the river via

groundwater discharge and/or NPDES surface water discharge.

Due to sporadic exceedances of NPDES permit limits for tin, copper, and hexavalent chromium at the outfall downstream of the settling ponds, GE submitted an evaluation of the plant wastewater treatment facilities in 1983. In 1985, GE submitted a RCRA Part B permit application for the settling ponds and sludge drying beds. In 1986, GE installed three deep monitoring wells to depths of approximately 60 feet.

In April 1988, a study was conducted to determine the hazardous constituents present in the waste that was placed in the surface impoundments. It was determined that only cadmium exceeded health based criteria. A closure plan for the surface impoundments and land treatment units was approved by CTDEP in 1988 and implemented in 1989.

The closure of the lagoons occurred between September 1989 and November 1990, and included excavation and removal of 30,000 cubic yards of contaminated soils including portions of neighboring residences. Much of the excavated area was removed to the water table, and in some cases below the water table. In January 1990, soil samples were collected west of the site and elevated concentrations of cadmium were found. As a result, access agreements with landowners were obtained and off-site excavations began on July 3, 1990. A buried drum of pure plating sludge was found beneath one of the residential properties. Also, a pocket of soil containing elevated concentrations of cadmium was detected during confirmation sampling. Following excavation of the site, a layer of clean fill was placed across the site and seeded or sodded with grass. Results of confirmation soil sampling were that all of the samples collected from above the water table produced a TCLP filtrate which met drinking water standards. Beneath the water table, some soils still contained elevated concentrations of cadmium.

In January 2003, soil borings were performed in the lagoon and soil samples were collected from depths ranging from 6 to 42 feet bgs. and analyzed for cadmium. Results of the soil sample analysis are provided in a letter from GE dated April 23, 2003. The maximum cadmium concentration of 32.9 ppm was detected in a soil sample from a depth of 8-10 feet, which is below the RSR residential DEC of 34 ppm.

Shallow monitoring wells, MW-101 through MW-106, are screened in the upper sands. Deep wells MW-107, MW-108, and MW-109, are screened in the partially confined lower sands. Groundwater sampling at the former lagoons is conducted quarterly. Wells are sampled for dissolved metals (aluminum, cadmium, chromium, hexavalent chromium, copper, iron, lead, nickel, silver, tin, and zinc), total cyanide, cyanide amenable to chlorination, and indicator parameters (specific conductance, pH, total organic carbon (TOC), and total organic halogen (TOX)). VOCs are sampled on an annual basis. Results of the groundwater sampling conducted in January, April, July, and October 2002 include the following:

VOCs were not detected in any of the nine wells.

RSR GWPC and SWPC standards were not exceeded in any of the three deep wells, but standards were exceeded for cadmium, copper, and/or zinc in four of the six shallow wells. Cadmium was the only contaminant detected at concentrations above the GWPC.

Upgradient shallow wells MW-101 and MW-102 (located near the western border of the lagoon) had higher concentrations than the downgradient shallow wells located near the Quinnipiac River.

The highest concentrations were found in shallow well MW-102 (located in a former sludge drying bed), with maximum concentrations of 426 ppb of cadmium (GWPC= 5ppb, SWPC = 6ppb), 111 ppb of copper (SWPC = 48 ppb), and 240 ppb of zinc (SWPC = 123 ppb). Shallow well MW-105 is located approximately 110 feet downgradient from MW-102 and approximately 30 feet upgradient from the Qunnipiac River. Cadmium was detected at significantly lower concentrations in MW-105, ranging between non detect (in two of four rounds) and 60 ppb, with an average of less than 20 ppb. Copper and zinc were not detected above GWPC or SWPC standards in MW-105.

Concentrations of cadmium ranged between 11 ppb and 53 ppb in upgradient well MW-101. MW-104 is a shallow well located approximately 150 feet downgradient of MW-101, and had lower concentrations of cadmium ranging from non detect (in 2 of four rounds) to 9 ppb. However, copper was detected in well

MW-104 once at a concentration of 78 ppb, which is above the SWPC of 48 ppb.

Surface water samples were collected from the Quinnipiac River on six occasions between July 1992 and February 1993 to determine whether cadmium was impacting the River. In a letter dated April 19, 1997, GE provided the results for the two downstream locations, SW-1 and SW-2. The results for cadmium ranged from non detect in eight of the twelve samples, to a maximum concentration of 8 ppb.

In August 2003, GE collected four surficial sediment samples from the Quinnipiac River adjacent to the former lagoons. GE submitted a letter report of the results dated September 9, 2003. The samples were analyzed for cadmium. Results were that concentrations ranged between non-detect and 3 ppm.

PIPELINE

In 1992, GE implemented a CTDEP approved site characterization work plan to assess the condition of the pipeline. This included a video inspection of the approximately 1,800 feet of abandoned pipeline, which was found to be in excellent condition. A thin accumulation of sludge was found to encrust the lower third of the pipeline interior. Soil samples were collected at 9 locations along Woodland Street immediately adjacent to the pipeline and analyzed for cadmium. Cadmium was not detected in the samples. Groundwater samples were collected from four wells located along Woodford Ave and Woodland Street (wells MW-301, 302, 303, and MW-202) and analyzed for cyanide and metals. Cadmium concentrations were below MCLs (the highest concentration detected was 4 ppb in well MW-302). Three additional rounds of groundwater sampling have been conducted since the 1992 investigation in April 1994, June 1994, and July 1995.

In May 1994, GE submitted the Groundwater Monitoring Report, Former Effluent Pipeline (contained in Appendix B of the April 1999 Part 1 Closure Plan). This monitoring report describes existing and new monitoring well and piezometer installations, groundwater flow direction, and results of groundwater sampling. Results of sampling for metals were that all samples met GWPC for metals.

In 1999, GE submitted the Part 1 Closure Plan, Former Effluent Pipeline, and GE conducted the work in September 2000. The investigation results are summarized in a May 25, 2001 letter from Haley and Aldrich to CTDEP. The letter describes the results of testing subsurface soils at 22 locations along the former effluent pipeline beneath Woodford Ave and Woodland Street. Results were that total and leachable cadmium were detected in soil samples above Media Closure Criteria at only one location, which had a total cadmium concentration (47.9 ppm) above tmmmhe RSR residential DEC concentration of 34 ppm. The majority of the samples were significantly below the DEC. Several soil samples also had concentrations of leachable thallium above the GA PMC, although Haley and Aldrich attributed this to matrix effects.

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	_X	___	___	Cadmium, copper and zinc detected in shallow lagoon wells above RSRs.
Air (indoors)[2]	___	_X_	___	No buildings, No VOC contaminants
Surface Soil (e.g., <2 ft)	___	_X_	___	Clean backfill in lagoons, pipeline buried.
Surface Water	__	_X_	___	Cadmium detected in Quinnipiac at 8 ppb. CT Water Quality Criteria for cadmium is 16 ppb.
Sediment	___	_X_	___	Cadmium below 3 ppm in Quinnipiac seds
Subsurf. Soil (e.g., >2 ft)	_X_	__	___	Cadmium beneath former lagoons.
Air (outdoors)	___	_X	___	No VOCs

_____ 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 and Reference(s):__

Groundwater:

Lagoons: Quarterly sampling of monitoring wells at the former lagoons indicates exceedences of cadmium above GWPC, and cadmium and copper above SWPC in shallow wells near the river. 2002 Annual Groundwater Monitoring Report.

Pipeline: Four rounds of groundwater samples were collected between 1992 and 1995 from four wells located along Woodford Ave and Woodland Street and analyzed for cyanide and metals. Contaminants were not detected above GWPC.

Surface Soils:

The lagoons were excavated, and clean backfill was used to re-grade. The pipeline is buried beneath asphalt pavement. No significant contamination has been found in soils around the pipeline above the CT DEC.

Surface Water:

The "appropriate levels" being used for this question are the CT Water Quality Standards (CTWQS) for human consumption of water and organisms. Monitoring wells located near the River were compared to SWPC.

Surface water samples were collected from the Quinnipiac River on six occasions between July 1992 and February 1993 to determine whether cadmium was impacting the River. In a letter dated April 19, 1997, GE provided the results for the two downstream locations, SW-1 and SW-2. The results for cadmium ranged from non detect in eight of the twelve samples, with a maximum concentration of 8 ppb, below the CTWQS of 16 ppb.

Sediments:

On August 28, 2003, GE collected 4 sediment samples from the Quinnipiac River adjacent to the former surface impoundment. Surficial sediment samples from 4 locations were analyzed for cadmium. Results were below 3 ppm, which is below the CTRSR residential DEC for cadmium of 34 ppm.

Subsurface Soils:

Lagoon. Results of post excavation confirmation soil sampling in 1990 were that all of the samples collected from above the water table produced a TCLP filtrate which met drinking water standards. **Beneath the water table soils contained elevated concentrations of cadmium.** In 2003, soil samples were collected from depths ranging from 6 to 42 feet bgs. and analyzed for cadmium. The maximum cadmium concentration of 32.9 ppm was detected in a soil sample from a depth of 8-10 feet, which is below

the RSR residential DEC of 34 ppm (letter from GE dated April 23, 2003).

Pipeline. Cadmium was detected at a maximum concentration of 47.9 ppm in a sample collected in September 2000 taken from the vicinity of the pipeline. The RSR residential DEC for cadmium is 34 ppm (letter re: soil sample results for pipeline, 5-25-01).

Footnotes:

[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

	Potential **Human Receptors** (Under Current Conditions)						
"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater	No	No	No	Yes	No	No	No
~~Air (indoors~~							
~~Soil (surface, e.g., <2 ft)~~							
~~Surface Water~~							
~~Sediment~~							
Soil (subsurface e.g., >2 ft)	No	No	No	Yes	No	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).

__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

Rationale and Reference(s):

Construction Workers: construction workers could be exposed to groundwater and subsurface soils while performing construction activities.

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[3] 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"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

__X__ 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):

Construction Workers: construction workers could be exposed to contaminated groundwater and subsurface soils while conducting construction activities. Exposures are not reasonably expected to be significant because while the levels of contamination exceed standards, the frequency of exposure is expected to be low.

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

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):

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_ 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 Former Timex Manufacturing facility, EPA ID # CTD001165208, located at Park Road Extension, Middlebury, CT 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) Robert W. Brackett Date 8/12/04
(print) Robert W. Brackett
(title) RCRA Facility Manager

Supervisor (signature) Matthew R. Hoagland Date 9/2/04
(print) Matthew R. Hoagland
(title) RCRA Corrective Action Section Chief
(EPA Region or State) EPA New England, Region I

Locations where References may be found:

References can be found in the site file in the Records Center at One Congress Street, Boston, MA.

Contact telephone and e-mail numbers

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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.