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: Norden Systems (Former)
Facility Address: 10 Norden Place, Norwalk, Connecticut
Facility EPA ID #: CTD089623318

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).

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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			TCE, TCA, PCE, VC, Cis-1,2-DCE
Air (indoors)[2]		X		SVE System removing VOC's from beneath building
Surface Soil (e.g., <2 ft)	X			TCE, PCE, Cis-1,2-DCE
Surface Water			X	
Sediment			X	
Subsurf. Soil (e.g., >2 ft)	X			
Air (outdoors)		X		

____ 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: TCE(1,480 ppb), PCE(55 ppb), Cis-1,2-DCE(870 ppb), VC(490 ppb),
Exceeds GA Groundwater Protection Criteria of the Connecticut Remediation Standard Regulations (RSRs)
Ref: Design Summary Report, Envirogen, January 9, 1998

Surface Soil (0-2'): Area of Environmental Concern (AEC)5: TCE(137 ppb)
AEC9A: benzo(a)pyrene (3,800 ppb), TPH (545 ppm) plus various PAHs
AEC5 is located beneath the slab of the site building. AEC9A is located in a wooded area of the site.
Exceeds Residential Direct Exposure Criteria and/or Pollutant Mobility Criteria of RSRs
Ref: Design Summary Report, Envirogen, January 9, 1998
Remedial Alternatives Evaluation for the Eastern Portion of the Site, Fuss & O'Neill, December, 1998

Subsurface Soil (>2'): AEC5 and AEC6 TCE(156 ppb)
AEC9A: Benzo(a)pyrene (3,800 ppb) plus various PAHs
Exceeds Residential Direct Exposure Criteria and/or Pollutant Mobility Criteria of RSRs
Ref: Design Summary Report, Envirogen, January 9, 1998
Remedial Alternatives Evaluation for the Eastern Portion of the Site, Fuss & O'Neill,December, 1998

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.

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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[3]
Groundwater	___	___	___	X			___
Air (indoors)	___	___	___				
Soil (surface, e.g., <2 ft)	___	X	___	X	X	___	___
Surface Water	___	___			___	___	___
Sediment	___	___			___	___	___
Soil (subsurface e.g., >2 ft)				X			___
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): Laboratory analysis of groundwater and soil samples obtained from the site has confirmed the presence of contamination at concentrations above applicable criteria of the RSRs.
Ref: Report of Investigations, Eastern Portion of the Site, Fuss & O'Neill, February 1998.
Design Summary Report, Envirogen, January 1998
Preliminary Groundwater Quality Results, Bedrock Monitoring Well and Groundwater Study, Saugatuck Landing, Norwalk, CT, Fuss & O'Neill, June 10, 1998

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

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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):

AEC9A: This area of environmental concern on-site contains TPH and various PAHs at concentrations that exceed the Residential Direct Exposure Criteria and/or the GA Pollutant Mobility Criteria of the RSRs. The entire parcel is currently used for industrial/commercial purposes. It is anticipated that an Environmental Land Use Restriction will be place on the Norwalk, CT land records to prohibit intrusive activities in this area of the site, and to prevent future residential use of the area.

AEC5, AEC6, AEC8: These areas of environmental concern on-site are located beneath the slab of the site building. The contaminants present at these areas are chlorinated VOC's. The concentrations of the VOC's in environmental media exceed applicable criteria of the RSRs. Currently, a Soil Vapor Extraction System is operating at AEC 5 and AEC 6. Geophysical investigations are continuing on-site at AEC8 to determine if the groundwater contamination identified at that location is hydraulically connected to AEC5 and AEC 6.

Groundwater on-site is not utilized for drinking purposes. The area topographically downgradient of the site is served by a public drinking water source

[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):

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 **Norden Systems (former)** facility, EPA ID **#CTD089623318**, located at **10 Norden Place, Norwalk, 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 _____ Date June 1999 EW 8-16-1999
Raymond Frigon, Jr.
Environmental Analyst
Connecticut Department of Environmental Protection

Supervisor _____ Date June 1999
Douglas C. Zimmerman
Supervising Environmental Analyst
Connecticut Department of Environmental Protection

Chief, RCRA Corrective Action Section
8-16-99

Locations where References may be found:

Connecticut Department of Environmental Protection
Bureau of Water Management
Permitting, Enforcement and Remediation Division
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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.