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: Chem Pak. Corp.
Facility Address: 167 Mill St., Cranston, RI 02905
Facility EPA ID #: RID084802842

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).

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	___	
Air (indoors)[2]	___	X	___	
Surface Soil (e.g., <2 ft)	___	X	___	
Surface Water	___	X	___	
Sediment	___	X	___	
Subsurf. Soil (e.g., >2 ft)	___	X	___	
Air (outdoors)	___	X	___	

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.

_____ 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):

First round on sampling submitted to EPA in a fax dated 7-30-01 that includes a letter to RI DEM dated 6-21-01. Data Attached.

Full report to follow and will include a second round of sampling and all rationales. The second round is expected in late 2001. Wells will be monitored on a regular schedule .

Groundwater data, from same soil locations, indicates the levels of Tetrachloroethene are below applicable State standards for GB classified groundwater. See rule 8.03B method 1 Groundwater Objectives.

Contamination is above the leachability levels but below human exposure levels. Groundwater and surface water are not accessible or drinkable. Site access is controlled with a locked gate and perimeter fence. VOA contamination is outside footprint of building.

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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2. Are groundwater, soil, surface water, sediments, or media known or....

Soil Analyses Summary						
Constituent	**Ind./Com. Direct Exposure Criteria (ug/Kg)**	**GB Leachability Criteria (ug/Kg)**	**LFR-1 4'-8' (ug/Kg)**	**LFR-2 0'-4' (ug/Kg)**	**LFR-3 0'-4' (ug/Kg)**	**LFR-4 8'-12' (ug/Kg)**
Napthalene	10,000,000		2,270	536	<30	<38
Tetrachloroethene	110,000	4,200	111	13,500	21,700	<38
Trichloroethene	520,000	20,000	1,170	3,550	16,200	<38
1,1,1-Trichloroethane	10,000,000	160,000	<67	149	457	<38
Cis-1,2-Dichloroethene	10,000,000	30,000	<67	119	2,330	<38
1,1-Dichloroethane	10,000,000	700	<67	<44	132	<38
Trans-1,2-Dicholoroethene	10,000,000	92,000	<67	<44	57	<38

The concentrations of constituents detected do not exceed the industrial/commercial direct exposure criteria, but do exceed the GB leachability criteria, for tetrachloroethene, according to the RI DEM, Rules and Regulations for the Investigation and Remediation of Hazardous Materials Release, March 31 1993, amended August 1996 (DEM-DSR-01-93). However, groundwater data does not suggest that tetrachloroethene is leaching from the soil.

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	____	____	____	____			____
Air (indoors)	____	____	____				
Soil (surface, e.g., <2 ft)	____	____	____	____	____	____	____
Surface Water	____	____			____	____	____
Sediment	____	____			____	____	____
Soil (subsurface e.g., >2 ft)				____			____
Air (outdoors)	____	____	____	____	____		

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

_____
_____
_____
_____
_____

[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)?

_____ 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):

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[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 Chem Pak Corp. facility, EPA ID # RID084802842, located at 167 Mill St., Cranston, RI 02905 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] Date September 27, 2001
(print)
(title) Edgar. A. Davis
RCRA Facility Manager

OK REVIED BY FRANK B. 9-27-01

Supervisor (signature)_____ Date _____
(print)_____
(title)_____
(EPA Region or State)_____

Locations where References may be found:

USEPA-REGION 1, RCRA FILES. (1 CONGRESS ST, STE 1100, BOSTON MA)

Contact telephone and e-mail numbers

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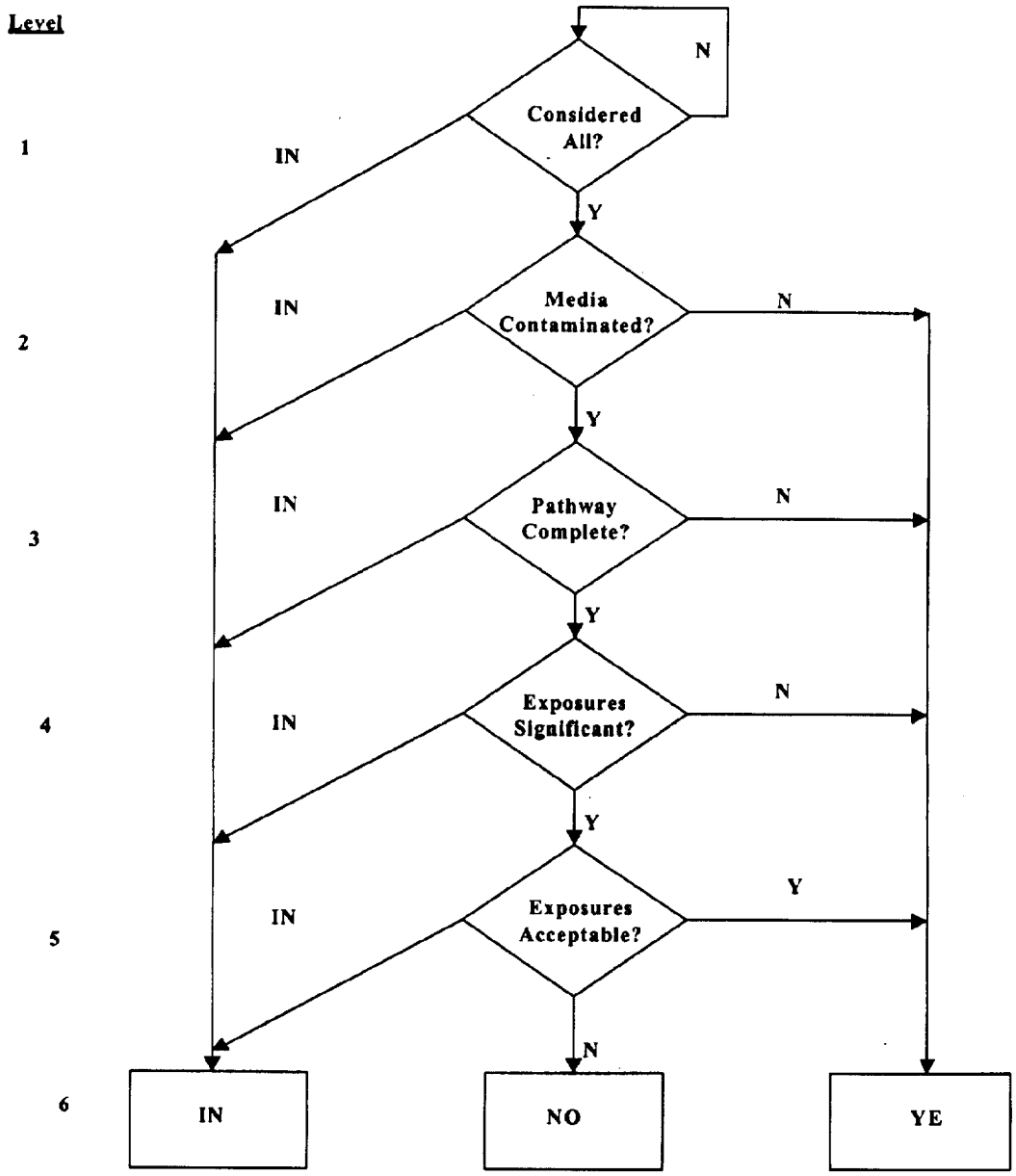
(phone #) 617-918-1379
(e-mail) davis.edgar@epa.gov

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.

Facility Name Chem Pak. Corp.
EPA ID#: 167 Mill St., Cranston, RI 02905
City/State: RID084802842

CURRENT HUMAN EXPOSURES UNDER CONTROL (CA 725)