Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
Interim Final 2/5/99

RCRA Corrective Action

Facility Name: Teknicircuits, Inc.
Facility Address: 84 Shelter Rock Road, Danbury, CT 06810
Facility EPA ID #: CTD053707741

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, 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?

XXX If yes - check here and continue with #2 below.
_____ If no - re-evaluate existing data, or
_____ If data are not available, skip to #8 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 "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "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 "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

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. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

XXX If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

_____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):
In December of 1996, the two concrete underground storage tanks, SWMUs 7 and 8, along with related contaminated soils were removed from the property. Groundwater samples analyzed from the three monitoring wells downgradient of the surface impoundments have not exceeded applicable standards.

According to the sampling data, groundwater does not appear to be contaminated within the footprint of the building. However, groundwater contamination has been identified in monitoring wells CEE 4, 6, 7, and 15, located on the southwest portion of the property boundary. These wells show elevated levels of chlorinated solvents. Other wells and constituents have been in compliance since early 1991 or longer.

Connecticut Department of Environmental Protection Regulations Concerning Remediation Standards (CT RSR)	
Acronym	**Definition**
GW I/C VC	Groundwater Industrial / Commercial Volatilization Criteria
GWPC	Groundwater Protection Criteria for areas classified as GA
SWPC	Surface Water Protection Criteria

Applicable Groundwater Criteria			
Constituent	GW I/C VC	GWPC	SWPC
1,1,1-Trichloroethane	50000	200	62000
1,1-Dichloroethane	50000	70	
1,1-Dichloroethylene	6	7	96
Vinyl Chloride	2	2	15750

Assessment Monitoring Report, Consulting Environmental Engineers, Inc. August 1991.
Demonstration Of No Further Action VOC's In Groundwater, Charter Oak Environmental Services, Inc., September 1998.
RCRA Corrective Action Voluntary Program – Investigation of AEC 16 and Loading Dock, Consulting Environmental Engineers, Inc., June 12, 1998.
RCRA Corrective Action Voluntary Program – Investigation of SWMU's 3,4,5,6,9,10, 11, 12, 13, 14, and 15; AEC's 16, 17, and 18, Consulting Environmental Engineers, Inc., June 25, 1997.

[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 appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

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Constituent	Monitoring Well	1989				1990				1991				1992			
		Apr	May	Aug	Nov	Feb	May	Aug	Dec	Apr	May	Aug	Nov	Mar	Jun	Oct	Dec
1,1,1-Trichloroethane	CEE-4	129	23.8	9.3	390	289	210	125	126	49	460	310	68.9	104	18.7	50.9	54.3
	CEE-6	58000	6710	30700	26800	27400	4574	29373	24100	9000	18205	6625	8156	6095	2623	1489	14700
	CEE-7	na	na	na	na	na	na	na	na	256	286	63.6	32.6			64	
	CEE-15	nd	88.4	125	240	96.4	65.2	32.8	119	186	93.3	1525	200	88.9	96	591	193
1,1-Dichloroethane	CEE-4	44.8	37.5	18.6	113	117	88.8	55.8	nd	17	56.1	40.3	12.4	16.2	10.5	21.4	10.9
	CEE-6	3460	2930	3940	1690	1878	39.5	972	nd	nd	430	540	359	290	327	328	781
	CEE-7	6.3	8.6	nd	nd	na	na	na	na	6.3	8.6	nd	nd				
	CEE-15	1.6	nd	nd	2.4	nd	nd	nd	nd	nd	nd	18.9	nd	nd	nd	6.1	nd
1,1-Dichloroethylene	CEE-4	17.8	14.9	na	68.1	42.5	27.5	69.5	nd	8	39.1	28.8	3.6	13.2	nd	nd	nd
	CEE-6	1750	2610	1500	2010	3829	18.5	2678	nd	810	1695	1235	695	1303	615	675	540
	CEE-7	na	na	na	na	na	na	na	na	15.2	25	2.9	nd			nd	
	CEE-15	nd	4	nd	2.4	nd	nd	nd	nd	nd	nd	16.5	nd	nd	nd	6.1	nd
Vinyl Chloride	CEE-4	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
	CEE-6	45.4	4.7	nd	11.9	nd	2.8	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
	CEE-7	na	na	na	na	na	na	na	na	na	na	nd	nd				
	CEE-15	nd	nd	nd	nd	nd	nd	nd	nd	na	na	na	na				

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Constituent	Monitoring Well	1993		1994		1995		1996		1997		1998		1999		2000		2001		2002
		May	Dec	Jun	Dec	May	2	1	2	1	2	1	2	1	2	1	2	1	2	1
1,1,1-Trichloroethane	CEE-4	599	166	nd	na	201	na	54.6	na	219	na	109	1488	nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	229
	CEE-6	3848	7694	1398	na	1366	na	2018	1002	454	na	763	4016	2103	1443	2045	2568	1584	1716	1405
	CEE-7	20		11.7	na	5.4	na	6.3	33.3	429	32.4	983	18.2	2.6	509	249	1.6	nd<1	2	2.1
	CEE-15	38	485	33.7	na	19.7	na	9.9	na	7.9	Na	8.9	na	19.9		15.3		22.1		12.6
1,1-Dichloroethane	CEE-4	10	40	2.3	na	17.8	na	13.9	na	31.4	Na	13	107	nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	48.4
	CEE-6	233	266	78.9	na	148	na	105	119	28.5	Na	57.7	632	131	83.2	159	222	123	191	121
	CEE-7			nd	na	nd	na	nd	nd	Nd<0.01	Nd<0.01	983	18.2	nd<1	4.2	nd<1	nd<1	nd<1	nd<1	Nd<1
	CEE-15	nd	10	nd	na	1.6	na	nd	na	Nd<0.01	na	Nd<0.01	na	nd<1		4.4		nd<1		Nd<1
1,1-Dichloroethylene	CEE-4	7	16	nd	na	17.2	na	11.8	na	14.5	na	5.1	157	nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	62.1
	CEE-6	674	684	173	na	302	na	126	238	40.6	na	131	1211	160	nd<50	248	304	160	414	171
	CEE-7			nd	na	nd	na	nd	nd	<1	<1	<1	Nd<0.01	nd<1	6.7	6.4	nd<1	nd<1	nd<1	Nd<1
	CEE-15	nd	5	nd	na	Nd<0.01	na	nd	na	Nd<0.01	na	Nd<0.01	na	nd<1		nd<1		nd<1		Nd<1
Vinyl Chloride	CEE-4	nd	nd	nd	na	nd	na	nd	na	nd	na	nd		nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	Nd<1
	CEE-6	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd		nd<50	nd<50	nd<25	nd<20	Nd<50	Nd<50	Nd<50
	CEE-7													nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	Nd<1
	CEE-15											na	na	nd<1		nd<1		nd<1		Nd<1

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

XXX If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[2]).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"[2]) – skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The site is located in a valley filled with glacial lake deposits. These lake deposits are approximately 90 feet thick with alternating thin layers of fine sand, silt and clay. Sympaug Brook passes the site approximately 200 feet west of the site and flows through the valley toward the north where it joins the Still River. Groundwater passing through the site is discharged to Sympaug Brook and, as a result, the existing area of groundwater contaminated by chlorinated solvents in not expected to increase.

Reference:

Assessment Monitoring Report, Consulting Environmental Engineers, Inc. August 1991.
Demonstration Of No Further Action VOC's In Groundwater, Charter Oak Environmental Services, Inc., September 1998.

[2] "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

XXX If yes - continue after identifying potentially affected surface water bodies.

_____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

As stated above, groundwater does discharge into a surface water body, Sympaug Brook.

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentrations of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentrations of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

XXX If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 10 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

	SWPC	10 X SWPC	GWPC (GA)	10 X GWPC
1,1,1-Trichloroethane	62000	620000	200	2000
1,1-Dichloroethane	NS	NS	70	700
1,1-Dichloroethylene	96	960	7	70
Vinyl chloride	15750	157500	2	20

In order to evaluate if the discharge of "contaminated" groundwater into surface water is likely to be "insignificant", the use of GWPC, for GA areas, and SWPC identified in the CT RSR were used for comparison. It is important to note that the groundwater at the site and Sympaug Brook are located in a GB classification, and the use of the GWPC for screening is conservative.

1,1-dichloroethane, and vinyl chloride have been below the 10 times GWPC screening level since 1990. In addition, 1,1,1-Trichloroethane also has been below the screening level since 1994, however there have been two samples from monitoring well CEE-6 that have been above the 10 times GWPC (1996/1 - 2018ppb; and 1998/2 – 4016ppb). 1,1-Dichloroethylene, in monitoring well CEE-6, has remained above the screening level of 70ppb. All constituents are below their respective 10 times SWPC for the past ten years with the exception of 1,1-Dichloroethylene in March of 1992 (1303 ppb) and November of 1998.

In addition, the statistical analysis of 1,1-Dichloroethylene, over the period of record, indicates a non-linear decline in concentration in CEE-6. The linear regression line shows a high degree of fit by several tests consistent with EPA guidelines. The declining slope of the data is accepted by the t-test at the 95% confidence level.

Demonstration Of No Further Action VOC's In Groundwater, Charter Oak Environmental Services, Inc., September 1998.

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[3] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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				Apr	May	Aug	Nov	Feb	May	Aug	Dec	Apr	May	Aug	Nov	Mar	Jun	Oct	Dec
1,1,1-Trichloroethane	CEE-4	62000	2000	129	23.8	9.3	390	289	210	125	126	49	460	310	68.9	104	18.7	50.9	54.3
	CEE-6			58000	6710	30700	26800	27400	4574	29373	24100	9000	18205	6625	8156	6095	2623	1489	14700
	CEE-7			na	na	na	na	na	na	na	na	256	286	63.6	32.6			64	
	CEE-15			nd	88.4	125	240	96.4	65.2	32.8	119	186	93.3	1525	200	88.9	96	591	193
1,1-Dichloroethane	CEE-4	NS	700	44.8	37.5	18.6	113	117	88.8	55.8	nd	17	56.1	40.3	12.4	16.2	10.5	21.4	10.9
	CEE-6			3460	2930	3940	1690	1878	39.5	972	nd	nd	430	540	359	290	327	328	781
	CEE-7			6.3	8.6	nd	nd	na	na	na	na	6.3	8.6	nd	nd				
	CEE-15			1.6	nd	nd	2.4	nd	nd	nd	nd	nd	nd	18.9	nd	nd	nd	6.1	nd
1,1-Dichloroethylene	CEE-4	96	70	17.8	14.9	na	68.1	42.5	27.5	69.5	nd	8	39.1	28.8	3.6	13.2	nd	nd	nd
	CEE-6			1750	2610	1500	2010	3829	18.5	2678	nd	810	1695	1235	695	1303	615	675	540
	CEE-7			na	na	na	na	na	na	na	na	15.2	25	2.9	nd			nd	
	CEE-15			nd	4	nd	2.4	nd	nd	nd	nd	nd	nd	16.5	nd	nd	nd	6.1	nd
Vinyl Chloride	CEE-4	15750	20	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
	CEE-6			45.4	4.7	nd	11.9	nd	2.8	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
	CEE-7			na	na	na	na	na	na	na	na	na	na	nd	nd				
	CEE-15			nd	nd	nd	nd	nd	nd	nd	nd	na	na	na	na				

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Constituent	Monitoring Well	10 x SWPC	10 x GWPC	1993		1994		1995		1996		1997		1998		1999		2000		2001		2002
				May	Dec	Jun	Dec	May	2	1	2	1	2	1	2	1	2	1	2	1	2	1
1,1,1-Trichloroethane	CEE-4	62000	2000	599	166	nd	na	201	na	54.6	na	219	na	109	1488	nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	229
	CEE-6			3848	7694	1398	na	1366	na	2018	1002	454	na	763	4016	2103	1443	2045	2568	1584	1716	1405
	CEE-7			20		11.7	na	5.4	na	6.3	33.3	429	32.4	983	18.2	2.6	509	249	1.6	nd<1	2	2.1
	CEE-15			38	485	33.7	na	19.7	na	9.9	na	7.9	Na	8.9	na	19.9		15.3		22.1		12.6
1,1-Dichloroethane	CEE-4	NS	700	10	40	2.3	na	17.8	na	13.9	na	31.4	Na	13	107	nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	48.4
	CEE-6			233	266	78.9	na	148	na	105	119	28.5	Na	57.7	632	131	83.2	159	222	123	191	121
	CEE-7					nd	na	nd	na	nd	nd	Nd<0.01	Nd<0.01	983	18.2	nd<1	4.2	nd<1	nd<1	nd<1	nd<1	Nd<1
	CEE-15			nd	10	nd	na	1.6	na	nd	na	Nd<0.01	na	Nd<0.01	na	nd<1		4.4		nd<1		Nd<1
1,1-Dichloroethylene	CEE-4	96	70	7	16	nd	na	17.2	na	11.8	na	14.5	na	5.1	157	nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	62.1
	CEE-6			674	684	173	na	302	na	126	238	40.6	na	131	1211	160	nd<50	248	304	160	414	171
	CEE-7					nd	na	nd	na	nd	nd	<1	<1	<1	Nd<0.01	nd<1	6.7	6.4	nd<1	nd<1	nd<1	Nd<1
	CEE-15			nd	5	nd	na	Nd<0.01	na	nd	na	Nd<0.01	na	Nd<0.01	na	nd<1		nd<1		nd<1		Nd<1
Vinyl Chloride	CEE-4	15750	20	nd	nd	nd	na	nd	na	nd	na	nd	na	nd		nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	Nd<1
	CEE-6			nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd		nd<50	nd<50	nd<25	nd<20	Nd<50	Nd<50	Nd<50
	CEE-7															nd<1	nd<1	nd<1	nd<1	nd<1	nd<1	Nd<1
	CEE-15													na	na	nd<1		nd<1		nd<1		Nd<1

Concentrations listed during sampling events are measured in ppb.

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

   XXX If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) Providing or referencing an interim-assessment[5]s appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors, which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

   _____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

   _____ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):

Discharge of "contaminated" groundwater into surface water is "currently acceptable". The furthest three-dimensional boundary of the groundwater contaminant plume is defined as Sympaug Brook. The plume, whether the origins are on-site or off-site the property, is demonstrated to be confined by the Sympaug Brook and not continuing to increase, creating a large environmental footprint. Upon entering the surface water body, one contaminant is above the appropriate screening level as demonstrated in section five. This contaminant is 1,1-dichloroethylene located in monitoring well CEE-6. It is important to note that the analysis of the data pertaining to CEE-6 has statistically demonstrated that the concentration is declining and that the concentrations for the past four years is below the 10 times SWPC.

Once entering the surface water body, 1,1-dichloroethylene volatilizes to the air. As the magnitude of the Henry's law constant for 1,1-dichloroethene, 0.19 atmospheres m3/mole, indicates, 1,1-dichloroethene is likely to partition readily into the atmosphere from water. Because of this, 1,1-dichloroethene is generally not found in surface water in high concentrations. In the air, reactive compounds formed by sunlight

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[4] Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

[5] The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

breakdown 1,1-dichloroethene. The compound remains in the air for about 4 days. 1,1- Dichloroethene in surface water is unlikely to partition into aquatic organisms.

State of CT, DEP memo, Re: RCRA Voluntary Corrective Action Program, Demonstration of No Further Action: VOCs in Ground Water, November 17, 1998.

Toxicological Profile For 1,1-Dichloroethane, U.S. Public Health Service, Agency for Toxic Substances and Disease Registry, December 1990.

7. Will groundwater-monitoring / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

   XXX If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations, which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

   _____ If no - enter "NO" status code in #8.

   _____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

Data collected by the facility's groundwater monitoring program will be utilized to evaluate whether the facility is making progress, verify that the plume is not expanding above levels of concern, and verify attainment of short-term goals. The facility's groundwater monitoring program consist of semi-annual sampling of ground water at nine monitoring wells: WELL-11, WELL-13, WELL-15, CEE-2, CEE-4, CEE-6, CEE-7, CEE-8, and CEE-9. The schedule of parameters and sampling frequency are summarized on the table below. The locations of the wells are shown on the attached figure.

Parameters:	
Annual Frequency	**Semi-annual Frequency**
Barium	pH
Cadmium	Specific Conductance
Chromium (total)	Temperature
Iron	Copper
Manganese	Lead
Nickel	Sodium
Sulfate	Chloride
Phenols	
Total Cyanide	
VOCs (Method 8010/8020)	
pH	
Specific Conductance	
Temperature	
Copper	
Lead	
Sodium	
Chloride	

Teknicircuits, Incorporated, RCRA Post-Closure Ground Water Annual Report, Novemeber, 2001.

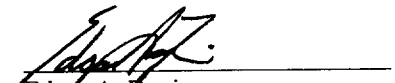
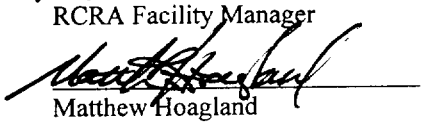
Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

XXX YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Teknicircuits, Inc., facility, EPA ID # CTD053707741, located at 84 Shelter Rock Road, Danbury, CT, 06810 under current and reasonably expected conditions. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

_____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

_____ IN - More information is needed to make a determination.

Completed by	(Signature)		Date September 24, 02
	(Print)	Edgar A. Davis	
	(Title)	RCRA Facility Manager	
Supervisor	(Signature)		Date 9/25/02
	(Print)	Matthew Hoagland	
	(Title)	Section Chief, RCRA CA Program	
	(EPA Region)	Region I – New England Office	

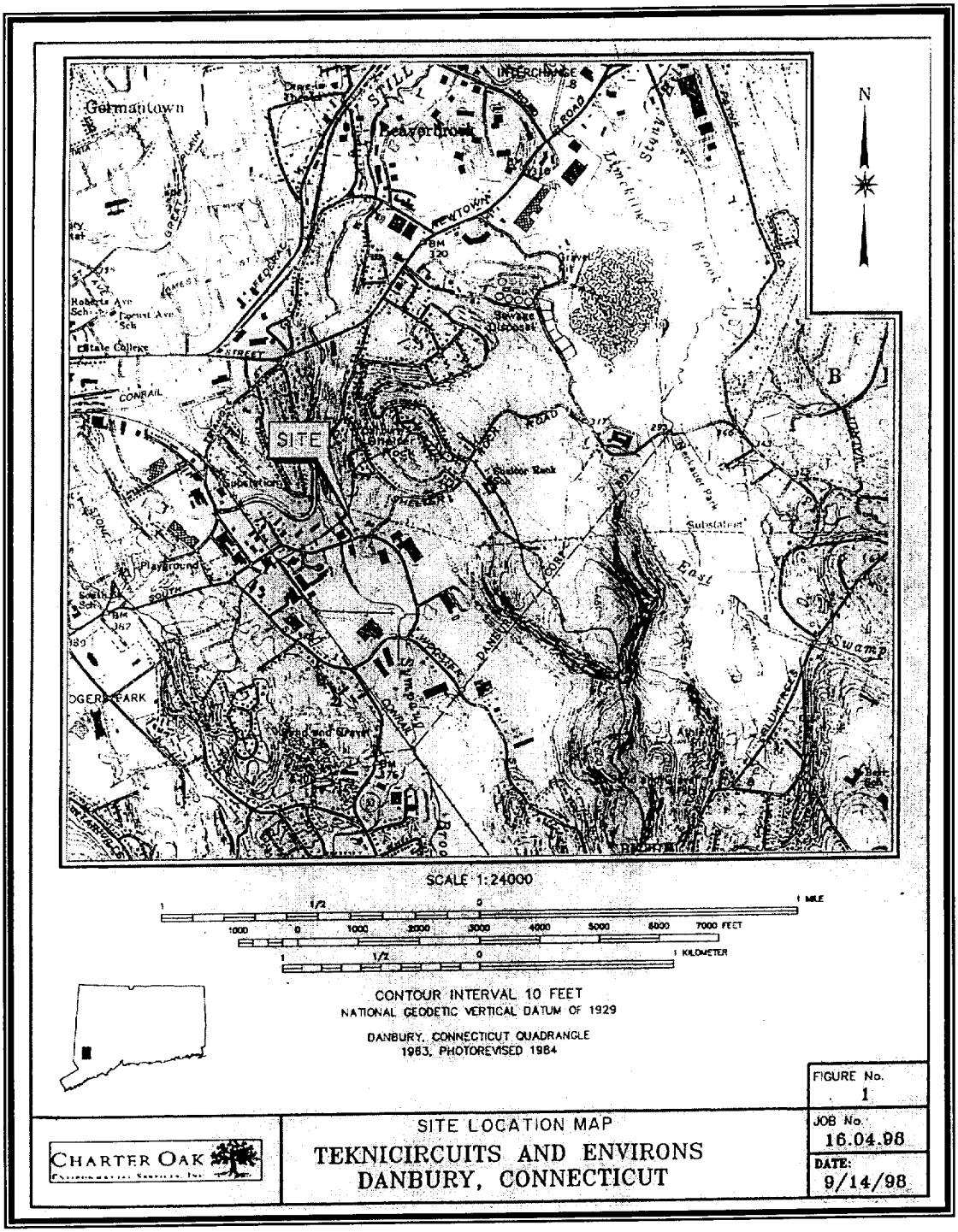
Locations where References may be found:

United States Environmental Protection Agency – Region I – New England Office
RCRA Files
1 Congress Street, Suite 1100
Boston, MA 02114-2023

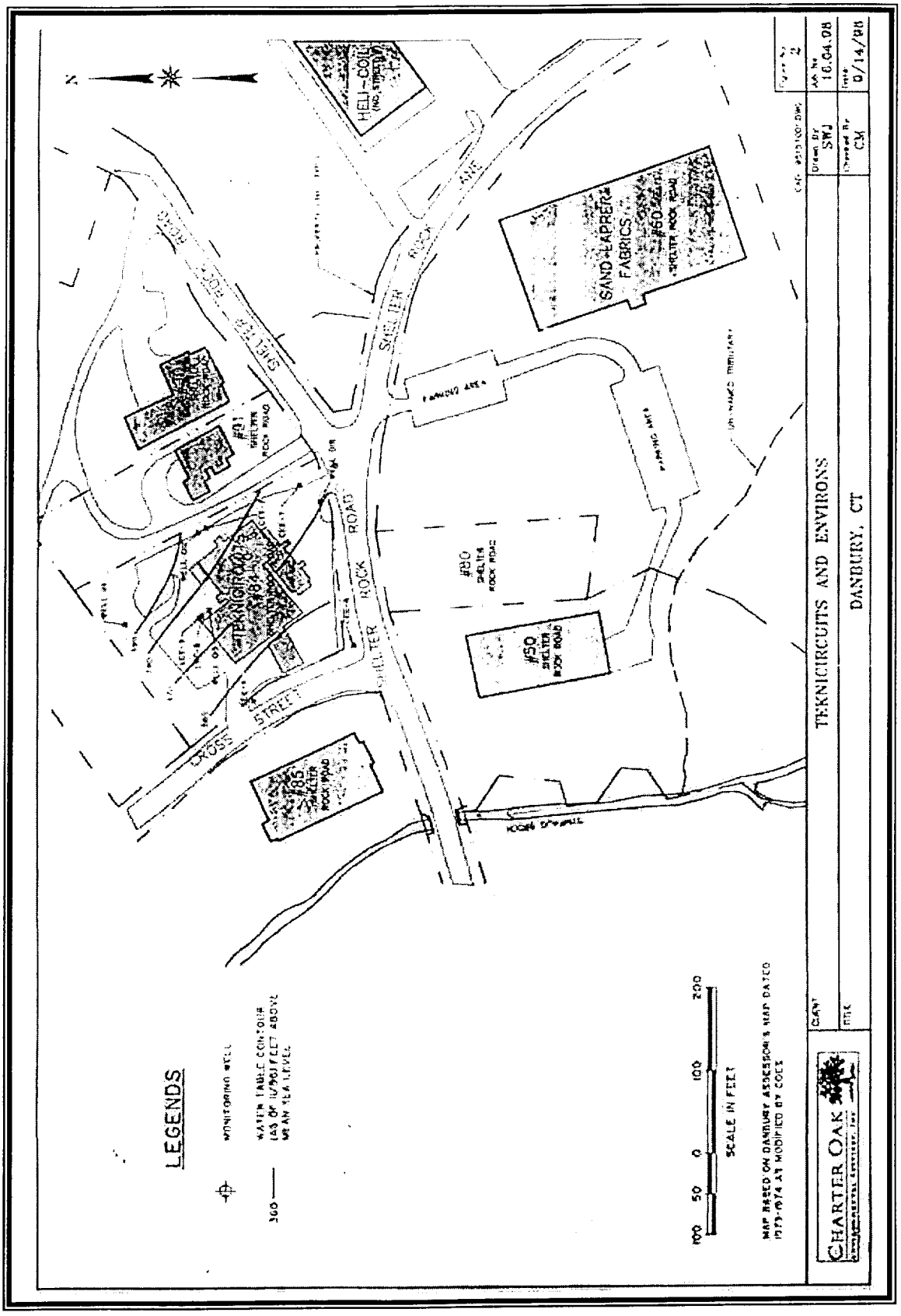
Contact telephone and e-mail numbers:

(Name)	Edgar A. Davis
(Phone #)	617-918-1379
(E-mail)	davis.edgar@epa.gov

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)



Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)



Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)