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: DuPont Corpus Christi Plant
Facility Address: Highway 361 Ingleside, Texas
Facility EPA ID #: TXD063101794

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).

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

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)?

Media	Yes	No	?	Rationale/Key Contaminants
Groundwater	√			Constituents of Concern (COC) in five groundwater plumes identified at the site include: chloride, fluoride, arsenic and volatile organic compounds (VOCs) (primarily carbon tetrachloride, chloroform, and tetrachloroethene).
Air (indoors)[2]		√		VOCs have been detected in groundwater at the site. Where structures are located near the plume(s), concentrations are below occupational screening levels. In addition, personnel air monitoring conducted at the Bulk Storage and Rail Loading Area in 2000 detected one COC below occupational screening levels.
Surface Soil (e.g., <2 ft)	√			Carbon tetrachloride and chloroform identified as COCs at the Bulk Storage and Rail Loading Area.
Surface Water		√		COCs were not detected above protective levels. See rationale for more information
Sediment		√		Not considered a media of concern.
Subsurface Soil (e.g., >2 ft)	√			Carbon tetrachloride and tetrachloroethene identified as COCs at the Former Miscellaneous Landfill Area. Carbon tetrachloride and chloroform identified as COCs at the Bulk Storage and Rail Loading Area.
Air (outdoors)		√		Not considered a media of concern. See rationale for more information.

____ 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.

[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).

Rationale and Reference(s):

Groundwater: For groundwater management purposes, the plant is divided into five areas (see Figure 1). These areas, with corresponding constituents of concern (COC), are summarized from the most recent annual groundwater monitoring report for the site, *Groundwater Remediation 2003 Annual Report for DuPont Corpus Christi Plant*.

- Brine Pond Area (BPA) - The COCs in the plume are chloride, and total dissolved solids (TDS), or salinity.
- Former Miscellaneous Landfill Area (MLA) - COCs in the MLA include fluoride, arsenic, tetrachloroethene (PCE), 1,1,2 –trichloro-1,2,2-trifluoroethane (CFC 113), and carbon tetrachloride. Degradation products of these constituents are also present at low levels (< 1 mg/L).
- Former Chlorocarbons Manufacturing Area (CMA) - Carbon tetrachloride was produced in this area and is the major site-related constituent present in groundwater. PCE, CFC-113, and degradation products are also present.
- Intermediates Manufacturing Area (IMA) - The primary site-related constituent is CFC-113 with lesser concentrations of PCE.
- Bulk Storage and Rail Loading Area (BS/RLA) – COCs in the BS/RLA include carbon tetrachloride, chloroform and 1,2-dichlroethane.

Indoor Air: EPA has deferred to the Occupational Safety and Health Administration (OSHA) on the issue of vapor intrusion (USEPA, 2002, 2003) at occupational settings. Hence, the following evaluation is based on meeting OSHA criteria.

At the BS/RLA, personnel air monitoring samples were collected on February 25, 2000, May 2, 2000, May 3, 2000, August 8, 2000, and November 11, 2000. Six to seven samples were collected from four areas of the BS/RLA during each sampling event (both indoor and outdoor locations). Carbon tetrachloride, chloroform and 1,2-dichloroethane (inside building location only) were analyzed in all samples submitted for analysis. Analytical results indicate that during all four sampling events, the only COC detected was chloroform at a level of 37 ug in the sample collected in the building (BLDG) during the February 25, 2000 monitoring event. Based on calculations (see Appendix 5 of DERS, 2001) using the average flow rate over the sample period, the Time Weighted Average (TWA) exposure to chloroform was 0.47 mg/m3 (0.096 ppm), which is roughly two orders of magnitude below the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) of 240 mg/m3 (50 ppm Ceiling). This concentration is also below the more stringent American Council of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV) of 49 mg/m3 (10 ppm 8-hr TWA) and the DuPont Acceptable Exposure Limits (AEL) of 10 mg/m3 (2 ppm, 8 and 12-hr TWA).

Occupied structures are not located within 100 feet of VOC plume(s) in the MLA and CCA. However, occupied structures are located within 100 feet of the VOC plume in the IMA.

While EPA has deferred to OSHA, the methodology developed in EPA's guidance on the subject can be used to assess potential indoor air issues. At the IMA, volatile constituents in the plume were screened against groundwater screening levels developed assuming occupational exposure and methodology outlines in EPA guidance on vapor intrusion (USEPA 2002). Results of the screening level comparison are as follows:

Analyte	units	OSHA PEL-BASED Screening Criteria	ACGIH TLV-BASED Screening Criteria	OW-55B 11/16/04	OW-56B 11/16/04	OW-58B 11/16/04	RW-08B 6/10/04	RW-15B 6/10/04	RW-16B 6/10/04
CARBON TETRACHLORIDE	mg/l	50.3	24.8	<2.	<0.001	<0.01	0.0072	<0.001	0.019
CHLOROFORM	mg/l	1600	327	<2.	0.0011	0.044	0.012	<0.001	0.015
CIS-1,2 DICHLOROETHENE	mg/l	4730	4750	<2.	<0.001	0.012	<0.001	<0.001	0.025
DICHLORODIFLUOROMETHANE	mg/l	1210	1210	<2.	<0.001	<0.01	<0.002	<0.002	0.015
TETRACHLOROETHYLENE	mg/l	899	225	<2.	0.0019	0.23	0.64 J	<0.001	2.1
TRICHLOROETHENE	mg/l	1270	637	<2.	<0.001	<0.01	0.0048	<0.001	0.18
TRICHLOROFLUOROMETHANE	mg/l	1400	1410	<2.	<0.001	<0.01	<0.002	<0.002	0.0043
VINYL CHLORIDE	mg/l	2.31	2.25	<2.	<0.001	<0.01	<0.001	<0.001	0.0029
1,3-DICHLOROBENZENE	mg/l			<2.	0.001	<0.01	<0.001	<0.001	<0.001
1,1,2-TRICHLOROTRIFLUOROETHANE	mg/l	355	358	140	0.009	0.05	130. B	<0.001	0.88 B

J – Estimated Value; B – Analyte detected in associated field or laboratory blank.

Based on this evaluation, there were no VOCs that exceeded the screening levels. Screening levels could not be calculated for 1,3-dichlorobenzene since PELs and TLVs have not been established. It is suspected that screening levels for this constituent would be in similar in magnitude as the other screening levels. In general, this constituent was detected at lower concentrations compared to the other constituents present within the respective samples.

It can be reasonably stated that the Corpus Christi Plant is less likely to have unacceptable vapor intrusion exposures. Therefore, further evaluation of the indoor air pathway is not warranted. However, DuPont will continue to monitor the plumes for any changes that would warrant further evaluation.

Derivation of the groundwater screening levels from Appendix D of the Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils, Subsurface Vapor Intrusion Guidance, November 2002.

*The **target groundwater concentration** corresponding to a chemical's target indoor air concentration is calculated by dividing the target indoor air concentration by an appropriate attenuation factor and then converting the vapor concentration to an equivalent groundwater concentration assuming equilibrium between the aqueous and vapor phases at the water table.*

Diffusion resistances across the capillary fringe are assumed to be accounted for in the value of α. The equilibrium partitioning is assumed to obey Henry's Law so that:

$$C_{gw}\ [mg/L] = C_{target,ia}\ [mg/m^3] * 10^{-3}\ m^3/L * 1/H * 1/\alpha$$

Where:

C_{gw} = *target groundwater concentration,*
$C_{target,ia}$ = *target indoor air (most current OSHA PEL or ACGIH TLV)*
α = *attenuation factor (ratio of indoor air concentration to source vapor concentration), used 0.001*
H = *dimensionless Henry's Law Constant at 25°C [(mg/L – vapor)/(mg/L – H_2O)] from EPA's Superfund Chemical Data Matrix (SCDM) database*

Surface soil: Soil samples (26 samples) were collected and evaluated for the Baseline Risk Assessment (BLRA) conducted for the MLA. No constituents were detected in surface soil samples (0 to 2 feet below ground surface (bgs)) collected at the MLA. Soil samples (12 samples) were also collected and evaluated for the BLRA conducted for the BS/RLA. Carbon tetrachloride and chloroform were identified as COCs in surface soil at the BS/RLA.

Surface Water: Between May and August 2004, surface water samples were collected from locations along the Navy Drainage Ditch and where the ditch discharges to Corpus Christi Bay to monitor groundwater discharge from the MLA. Arsenic and CFC-113 were detected in the surface water samples, but at levels well below protective target receptor concentrations identified in the BLRA for the MLA.

In order to validate the results of the ground and surface water modeling for the BS/RLA, surface water samples were collected at several locations along the plant shoreline at expected points of discharge of the B2 Sand (the B Sand decreases in thickness at the shoreline and no discharge is apparent). Samples were collected on December 9 through 10, 1996, during low tide to assess potential COC concentrations during the maximum tidal influence on B2 sand discharge into La Quinta Channel. COCs above screening levels were not identified. Surface water sampling was also conducted in the La Quinta Channel (part of Corpus Christi Bay) in 1995. COCs (carbon tetrachloride, chloroform and methylene chloride) were less than the practical quantitation limit (PQL).

Subsurface Soil: Soil samples (26 samples) were collected and evaluated for the BLRA conducted for the MLA. Carbon tetrachloride and PCE were identified as COCs in subsurface soil samples (greater than 2 feet below ground surface (bgs)) collected at the MLA. Soil samples (12 samples) were also collected and evaluated for the BLRA conducted for the BS/RLA. Carbon tetrachloride and chloroform were identified as COCs in subsurface soil at the BS/RLA.

Air (outdoors): Similar to the arguments presented earlier for indoor air, the outdoor air pathway is also not a concern. No COCs were identified in subsurface soil collected from the unsaturated zone at MLA. In addition, no COCs were identified from personnel air monitoring conducted at the BS/RLA.

References (Location of Data Set Used for EI Evaluation):

BPA

- DuPont Environmental Remediation Services. (DERS, 1995). *Remedial Investigation and Baseline Risk Assessment Brine Pond Area*. DuPont Corpus Christi, April 26, 1995.

MLA

- DuPont Environmental Remediation Services. (DERS, 1998a). *Baseline Risk Assessment Risk Reduction Standard No. 3 Former Miscellaneous Landfill Area*. DuPont Corpus Christi, November 26, 1998.
- DuPont (DuPont, 2001b). *Response to Notice of Deficiency to Baseline Risk Assessment Standard No. 3 Former Miscellaneous Landfill Area*. DuPont Corpus Christi, October 30, 2001.
- DuPont (DuPont, 2002a). *Response to Notice of Deficiency to Baseline Risk Assessment Standard No. 3 Former Miscellaneous Landfill Area*. DuPont Corpus Christi, February 12, 2002.
- DuPont (DuPont, 2002b). *Response Action Plan Former Miscellaneous Landfill Area*. DuPont Corpus Christi, November 11, 2002.

CMA and IMA

- DuPont (DuPont, 2003). *Groundwater Remediation 2003 Annual Report*. DuPont Corpus Christi, March 2004.

BS/RLA

- DuPont Environmental Remediation Services. (DERS, 1998). *Baseline Risk Assessment Risk Reduction Standard No. 3 Bulk Storage and Rail Loading Area*. DuPont Corpus Christi, August 31, 1998.
- DuPont Environmental Remediation Services. (DERS, 1999). *Response Action Plan Bulk Storage and Rail Loading Area*. DuPont Corpus Christi, August 27, 1999.
- DuPont Environmental Remediation Services. (DERS, 2001a). *Final Air Monitoring and Groundwater Monitoring Status Report Bulk Storage/Rail Loading Area*. DuPont Corpus Christi, March 15, 2001.

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**[2]
Groundwater		**No**		**Yes**			**No**
~~Air (indoors)~~							
Soil (surface, e.g., <2 ft)		**Yes**		**Yes**			**No**
~~Surface Water~~							
~~Sediment~~							
Soil (subsurface e.g., >2 ft)		**No**		**Yes**			**No**
~~Air (outdoors)~~							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strikeout 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). N/L = Not Likely
3. Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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

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

Rationale and Reference(s):

Potential human receptors include:

(1) **On-site Industrial Workers**: The on-site industrial worker is potentially exposed to constituents in surface soil (conservatively defined as 0 to 2 feet bgs) during day to day operations at the BS/RLA.

(2) **On-site Construction/Excavation Workers:** The on-site construction/excavation worker is potentially exposed to constituents in soil and groundwater while repairing subsurface utility lines, performing remedial activities or short-term construction. Subsurface soil depths for direct contact exposures by this receptor are defined as 2 to 12 feet bgs based on past activity at the facility and the location of utilities on-site. Groundwater occurs at depths as shallow as 10 feet bgs at the site; therefore, direct contact with groundwater may also occur during intrusive activities.

No downgradient users of off-site groundwater exist due to the prevailing flow direction towards either the Navy Drainage Ditch, stormwater ditch or Corpus Christi Bay; and, groundwater flow is also affected and contained by the on-going groundwater remediation systems. Therefore, off-site workers and residents exposed to groundwater were not considered potential receptors. The main plant area is fenced / guarded and limited to authorized personnel only. Therefore, trespassers were also not considered potential receptors.

Sensitive receptors (such as daycare) are not located on or adjacent to the site. Therefore, these receptors were not considered potential receptors.

Complete Exposure Pathways by Media:

(1) **Groundwater:** The potential for exposure is low because groundwater is not used on-site for potable or industrial purposes and downgradient users of groundwater have not been identified. However, due to the shallow depth of groundwater, exposure may occur during intrusive activities.

Potentially complete exposure pathways may include: on-site construction/excavation worker - incidental ingestion of and dermal contact with groundwater, and inhalation of vapor phase chemicals released from groundwater to a confined space (trench).

(2) **Surface Soil:** The potential for exposure to COCs in surface soils is low for most receptors under current conditions because the principal areas of surface soil contamination are limited to few sample locations in the BS/RLA. The receptor with the greatest potential for exposure is the on-site construction/excavation worker, where a greater likelihood of direct contact with impacted soil is associated with intrusive activities.

Potentially complete exposure pathways may include the following for the on-site industrial and construction/excavation workers – incidental ingestion of and dermal contact with surface soil and inhalation of soil-derived particulates.

(3) **Subsurface Soil**: Because subsurface soil contamination is only present on-site, and exposure to subsurface soil is only achieved during excavation and construction activities, the only potential receptor is the on-site construction/excavation worker.

Potentially complete exposure pathways may include incidental ingestion of and dermal contact with subsurface soil and inhalation of soil-derived particulates and vapors.

Incomplete Exposure Pathways by Media:

(1) **Groundwater:** Shallow groundwater is not used on-site for potable or industrial uses. Furthermore, shallow groundwater is naturally non-potable due to high total dissolved solids (TDS); and, based on an evaluation of area hydrogeology, there is no evidence that shallow groundwater is in communication with any potable aquifer. Therefore, direct contact (ingestion or dermal contact) with groundwater for on-site industrial workers and off-site receptors (workers/residents) are incomplete. In addition, there are no human receptors affected by the increased salinity in the groundwater from the BPA.

Exposure pathways associated with **food** are incomplete. BLRAs completed for both the MLA and BS/RLA identified a lack of bioaccumulation potential for site COCs in fish tissue. Therefore, potential exposure to COCs via ingestion of **fish** is expected to be negligible.

(2) **Subsurface Soil:** Since the day-to-day operations of the on-site industrial worker do not include intrusive activities, direct contact (ingestion or dermal contact) with subsurface soil is not anticipated and is incomplete.

Exposure pathways associated with **food** are incomplete.

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

Groundwater Exposure Pathways: Potential exposure for an on-site industrial worker and on-site construction/excavation workers to groundwater is not significant due to the strict adherence to a rigorous system of policies and procedures employed at the DuPont Corpus Christi Plant to protect against unacceptable exposures. The facility utilizes a permitting process that requires Environmental Affairs authorization for any intrusive activities (boring, drilling, excavation, etc.) into the soils or building foundations at the facility. The purpose of the permitting process is to ensure that appropriate measures are taken for personnel protection should the intrusive activity encounter impacted soils or groundwater. The site environmental support personnel provide the requirements on appropriate personal protective equipment (PPE). Because Occidental Chemical Company owns the BS/RLA property, a program has been implemented by their representatives to include the following administrative controls which are pertinent to all area excavations greater than four feet in depth:

- ❑ Incorporate an environmental review prior to issuing excavation permits,
- ❑ Notify the DuPont Environmental Coordinator before work begins in the plume area, and
- ❑ Require air monitoring and, if needed for construction worker protection, all appropriate PPE.

A copy of the Oxy procedures is included as Attachment 2.

Surface Soil Exposure Pathways: One location in the BS/RLA exceeded surface soil screening criteria. Inhalation of vapors was the primary contributor to risk as evaluated in the BLRA for the area. However, subsequent personnel air monitoring did not identify a concern for this pathway. As a result, the exposure to impacted surface soil is not significant.

Subsurface Soil Exposure Pathways: Strict adherence to the permitting process described above for intrusive activities would preclude access to impacted soils without protective measures, such as PPE, to prevent exposures. As a result, exposures to on-site construction/excavation workers from impacted subsurface soil are not significant

[3] 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):

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

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 **DuPont Corpus Christi Plant**, EPA ID # **TXD063101794**, located at **Highway 361, Ingleside, Texas**, 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) _____ Date 3/9/05

(print) Sue Rogers

Project Manager

Supervisor (signature) _____ Date 3/9/05

(print) Jason Wang

(title) Supervisor

Texas Commission on Environmental Quality

Locations where References may be found:

TCEQ Central Records, Austin, Texas

Contact telephone and e-mail numbers

(name) Project manager listed above
(phone #) (512) 239-2343
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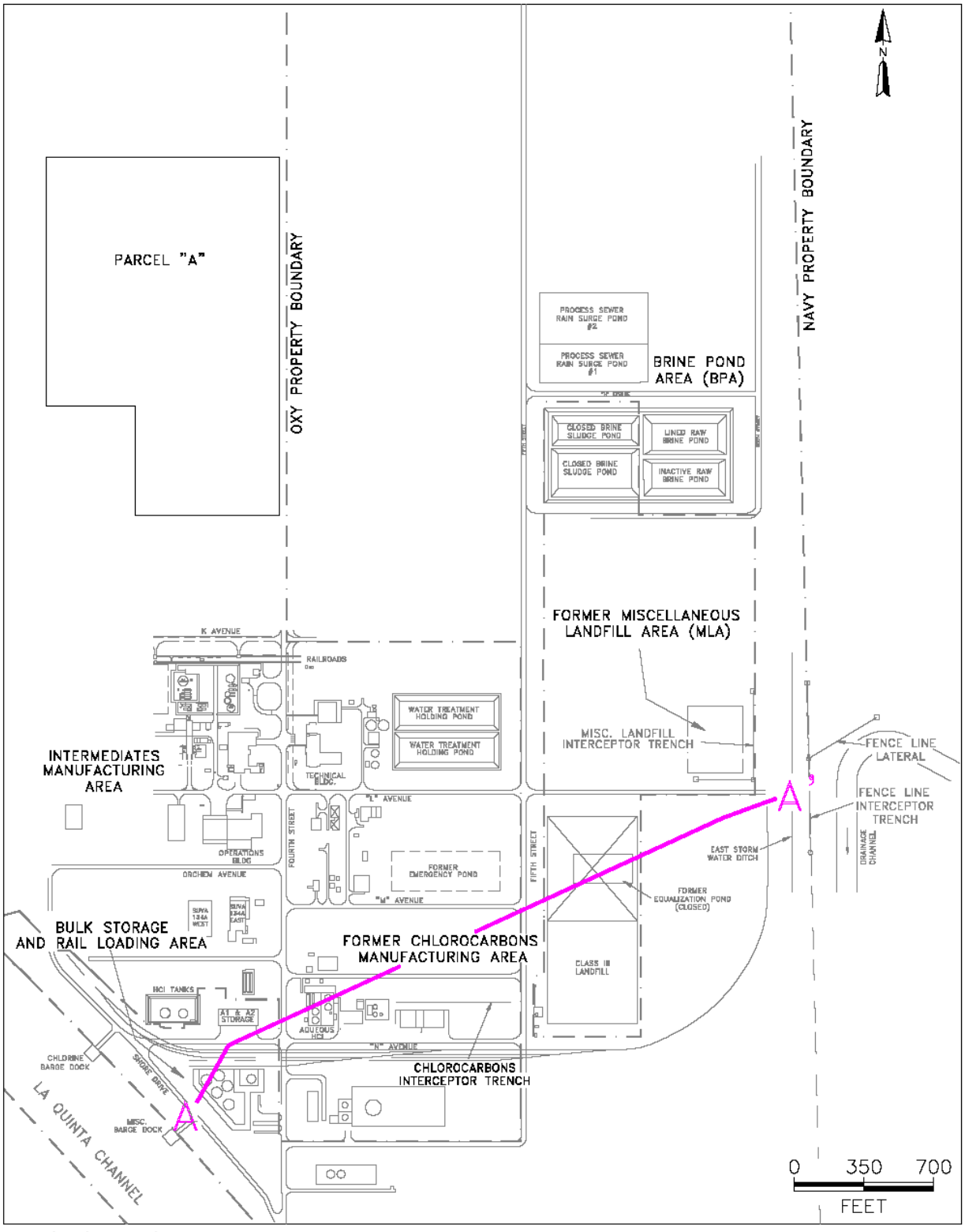
FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

Attachments

Tables

2004 Groundwater and Surface Water Monitoring Data – MLA Area



CORPUS\GEO\SECTIONS\CSLOCA_A

Corporate Remediation Group An Alliance between DuPont and URS Diamond 140 Cypress Station Drive, Suite 140 Houston, Texas 77090	TITLE: Cross-Section Location Map 2003 Annual Report DuPont Corpus Christi Plant	DWN: RAH APPD: CHKD: REV.: 2/18/04 DATE: 2/13/02	PROJECT NO.: 2847.40050 FIGURE NO.: 1