

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: ATOFINA Chemicals, Inc. (Formerly Elf Atochem)
Facility Address: NYS Route 63, Piffard, New York
Facility EPA ID #: NYD002218436

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).

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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)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	<u>X</u>	—	—	<u>See Discussion Below</u>
Air (indoors) ²	—	<u>X</u>	—	—
Surface Soil (e.g., <2 ft)	<u>X</u>	—	—	<u>See Discussion Below</u>
Surface Water	—	<u>X</u>	—	—
Sediment	—	<u>X</u>	—	—
Subsurf. Soil (e.g., >2 ft)	<u>X</u>	—	—	<u>See Discussion Below</u>
Air (outdoors)	—	<u>X</u>	—	—

— 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): The facility occupies approximately 300 acres of land off of Route 63 in the Town of York, Livingston County, New York. Approximately 75 acres of the 300 acre property is used for material processing, the remainder of the property is undeveloped. The site is bordered by the Genesee River on the north, agricultural and undeveloped land on the east and west and a residential area on the southwest. The nearest resident is approximately 2,000 feet southwest of the site. The primary products manufactured at the facility are organic peroxides. These products are widely used in the plastics industry as initiators for free radical polymerization and/or copolymerization of vinyl and diene monomers; as curing agents for thermoset resins; and as cross-linking agents for elastomers and polyethylene. The facility has conducted a RCRA Facility Investigation (RFI) for five Solid Waste Management Units (SWMUs) at the facility and has been approved by the NYSDEC in January 1996. Limited areas of soil and groundwater contamination has been detected at a former container storage area and the east landfill area. Contaminants include both volatile (<1 ppm) and Semi-volatile organic (<10 ppm) compounds in the soil and groundwater. Further details on the presence and magnitude of detected contamination can be found in Tables 1-1 through 1-7 of the “draft Corrective Measures Study, Elf Atochem North America, Inc. Genesee Facility, Malcolm Pirnie, February 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	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>			<u>NO</u>
Air (indoors)	<u>NO</u>	<u>NO</u>	<u>NO</u>				
Soil (surface, e.g., <2 ft)	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>YES</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>
Surface Water	<u>NO</u>	<u>NO</u>			<u>NO</u>	<u>NO</u>	<u>NO</u>
Sediment	<u>NO</u>	<u>NO</u>			<u>NO</u>	<u>NO</u>	<u>NO</u>
Soil (subsurface e.g., >2 ft)				<u>NO</u>			<u>NO</u>
Air (outdoors)	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>		

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): Constituents were detected in surface soils at the former Container Storage Area exceeding New York State guidance criteria (see attached table). These soils may be encountered by trespassers, site workers and/or site visitors. Further details on potential exposure pathways can be found in Table 2-6 of the “draft Corrective Measures Study, Elf Atochem North America, Inc. Geneseo Facility, Malcolm Pirnie, February 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): Soil and Groundwater contamination at the facility are located in isolated areas and limited in extent to the source of the contaminants (container storage area soils and disposal pits). Migration of contamination is limited due to low permeable soils and low hydraulic gradient and limited concentrations of contaminants. In addition, the facility is fenced and access is restricted. As part of the Corrective Measures Study various approaches for source control/removal are being evaluated. Further details on the presence and magnitude of detected contamination can be found in Section 1 of the “draft Corrective Measures Study, Elf Atochem North America, Inc. Geneseo Facility, Malcolm Pirnie, February 1998”.


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.


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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 ATOFINA Chemicals Inc. facility, EPA ID #**NYD002218436**, located at **NYS Route 63, Piffard, New York** 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 09/29/2000
(print) Kent D. Johnson
(title) Engineering Geologist 2

Supervisor (signature)  Date 09/29/2000
(print) Paul J. Merges, Ph.D.
(title) Director, Bureau of Radiation and Hazardous Site Management
(EPA Region or State) NYSDEC

Locations where References may be found:

New York State Department of Environmental Conservation, Division of Hazardous Substances Regulation
50 Wolf Road, Room 460, Albany, NY 12233-7251
(518) 457-9253

New York State Department of Environmental Conservation, Region 8 Office
6274 East Avon-Lima Road, Avon, NY 14414
(716) 226-2466

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.