**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

**RCRA Corrective Action**
**Environmental Indicator (EI) RCRIS code (CA725)**
**Current Human Exposures Under Control**

**Facility Name:** **Caribe General Electric Products, Inc.**
**Facility Address:** **P.R. Road 149 Km. 67, Calle Carrion Maduro Final, Juana Diaz, Puerto Rico**
**Facility EPA ID#:** **PRD090282757**

## 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 EIs 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 objectives of the RCRA Corrective Action program, the EIs 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 is for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and does 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 Determination status codes should remain in the 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).

## Facility Information

Caribe General Electric (GE) Products, Inc., is a five-acre site located in the south central part of the Island of Puerto Rico in the municipality of Juana Diaz, near the intersection of Routes 14 and 149. GE began operations at this site on August 30, 1957, originally leasing the property from the Puerto Rico Industrial Development Company (PRIDCO). GE acquired the property in 1987. Prior to use by GE, the site was used to grow sugar cane. The GE facility manufactured electric wiring devices including switches, receptacles, starters, and relays. Manufacturing of switches containing mercury (Hg) was

discontinued at the facility in 1970. Electroplating of the manufactured electric wiring devices began at this facility in 1971. This site was listed on the National Priorities List (NPL) as a Superfund Site by USEPA in 1983 due to a mercury-contaminated landfill (Solid Waste Management Unit (SWMU) 1) at the site. The Superfund program took responsibility for overseeing cleanup of this landfill. All remedial actions have been completed and USEPA has determined that no further action is necessary with regards to this unit.

According to the RCRA Facility Assessment (RFA) Report, GE notified USEPA of its hazardous was activity on August 5, 1980, and was classified as a hazardous waste generator facility and storage facility. Hazardous wastes reported as being generated were F006, F007, F008, and F009 wastes. A revised notification was submitted on September 1, 1987, however, indicating that only F006 and D007 were generated. The Part A permit application was submitted on November 14, 1980. In 1987, GE requested a change in status from a hazardous waste storage facility to only a hazardous waste generator facility. On April 21, 1987, GE was requested by USEPA to submit either a RCRA Part B Permit Application or a closure plan for Container Storage Area No. 1, which was the only RCRA unit at the facility. GE submitted the closure plan on May 17, 1988. The RFA was performed and submitted on May 10, 1989, in order to implement any necessary corrective action.

GE discontinued operations at the site in May 2000. All units (SWMUs and Areas of Concern (AOCs)) at the site have been removed and closed. The site is currently secured by a chain link security fence and is subject to 24-hour security provided by an on-site security guard. No industrial activities are currently taking place at the site.

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

**Summary of SWMUs and AOCs:** The following seven SWMUs and two AOCs were identified in the RFA Report (May, 1989). Details pertaining to each are outlined below. A site map is provided in Attachment 1 and outlines the location of each SWMU and AOC at the site.

**SWMU 1, Mercury Contaminated Landfill:** This land disposal unit contained waste fill that was contaminated with mercury. This area is also referred to as the West Field, as it is located on the west side of the GE plant and actually extends onto the adjacent property to the west, which is owned by PRIDCO. This landfill was used between 1957 and 1969 for the disposal of defective parts from silent mercury switches. USEPA was notified in 1981 as to the presence of mercury at the site. In 1983, USEPA placed this unit on the NPL list. Remediation of this unit has been ongoing and was completed in April, 2000. Remediation began by excavating waste fill material and physically separating the high-concentration wastes containing free mercury. Contaminated soil and residual materials, totaling 13,424 tons, were excavated from this unit and shipped off site for disposal. In addition, 172 tons of metallic components were sent for retort at an off-site facility. All excavated areas were then backfilled with clean soil. Confirmatory sampling indicated that all mercury levels in soil at this unit are now reduced to a level less than the residential Preliminary Remediation Goal (PRG) of 39 mg/kg, which was established by the USEPA in the Revised Baseline Risk Assessment (Ref. 4). Groundwater monitoring was conducted during and after the excavations were performed and indicated that groundwater had not been adversely impacted by the waste fill material at this unit (Refs. 2 and 4). The initial sampling (December, 1991) was conducted as part of the Supplemental Remedial Investigation, during which the network of 11 monitoring wells (10 shallow, 1 deep) at the site were sampled for VOCs, total mercury, inorganic mercury and organic mercury. Several chlorinated hydrocarbons were detected (tetrachloroethane, trichloroethane, and 1,1,1-trichloroethane); however, constituent levels did not exceed the Maximum Contaminant Levels (MCL), the primary drinking water standard as defined by the Safe Drinking Water Act (Ref. 2). During the final groundwater monitoring event in March 2000 to confirm post remedial action cleanup goals had been achieved, groundwater samples were collected from eight of the existing monitoring wells (MW-1, MW-3, MW-5, MW-6, MW-7, MW-8S, MW-8D, MW-9) (See Attachment 2). Groundwater samples were analyzed for total mercury and all results (max. 0.63 µg/L) were below the MCL (2.0 µg/L) (Ref. 4). Thus, the Remedial Action Report and Final Closeout Report concluded that groundwater had not been impacted by activities at this unit and that no long-term groundwater monitoring would be necessary at the site. USEPA has concluded that no further action is necessary for soil or groundwater at this unit (Refs. 4, 5, and 6).

**SWMU 2, Container Storage Area No. 1 (CSA 1) for FOO6 wastes:** This unit consisted of a 480 square foot enclosed storage area with concrete floors, concrete and steel walls, fenced gates, a metal roof, and secondary containment to capture any releases. Storage at this unit began in 1980. The unit was closed in 1990. Wastes stored in this unit included F006 sludge, D007,

and spent chromate solution from electroplating processes. No releases were ever reported at this unit. This unit underwent RCRA closure in 1990. Initial concrete samples indicated elevated levels of chromium and metals contamination in excess of EPA health-based standards (Ref. 6). Delineation of the contamination was performed and approximately ten cubic yards of contaminated concrete and soil were removed. Confirmatory samples indicated that constituent levels had been reduced to levels below the EPA health-based standards, and the area was subsequently backfilled. The RCRA Closure Plan was approved by the Puerto Rico Environmental Quality Board (EQB) on March 29, 1991 (Ref. 6). USEPA and EQB have determined no further action is required for this unit.

**SWMU 3, Container Storage Area No. 2 (CSA 2) for Spent Oil:** This unit was used for the storage of non-regulated, non-hazardous used oil. Storage at this unit began in 1986 and ceased in 1989 (Ref. 4). The unit consisted of a 180 square foot area with a concrete floor, aluminum walls, aluminum roof, and secondary containment system (Ref. 1). Per the 1989 RFA, no known releases were documented at this unit and no further action was recommended. USEPA and EQB have concurred with the no further action determination (Ref. 6).

**SWMU 4, Container Storage Area No. 3 (CSA 3) for Metal Scrap:** This unit consisted of two outdoor areas (Area 1 and 2) that were utilized for temporary storage in 1988, with all storage ceasing in 1989. Area 1 was utilized to store brass scrap and consisted of a concrete floor, roof, and fence around the perimeter. Area 2 was utilized to store raw materials and measured approximately 600 square feet in size. Area 2 also consisted of a concrete floor, aluminum walls, and roof. Neither of these areas had secondary containment systems. No hazardous waste products were ever stored in either of these two areas, nor was there any evidence of past releases in these areas (Ref. 1). Given the short length of time this area was used, the types of materials stored in this location, and the low permeability attributed to site soils, GE recommended no further action for this area (Ref. 6). USEPA has concurred with this no further action determination (Ref. 7).

**SWMU 5, Wastewater Treatment Unit No. 1 (WWT-1) for Chromate Reduction:** This unit consisted of an aboveground 125-gallon fiberglass tank. This unit was utilized from 1971 to December 1988 and was part of the facility's wastewater treatment system (SWMUs 5, 6, and 7). This unit was utilized for the facility's chromate oxidation-reduction process, where hexavalent chrome from the electroplating process was chemically reduced to trivalent chrome by the addition of sodium metabisulfite and sulphuric acid. A subsurface secondary containment system, resembling a basement, surrounded this unit (Ref. 1). The Decontamination Summary Report for SWMUs 5, 6, and 7 (April 2001) documents the cutting, containerizing, and disposal of this unit. Concrete and soil samples were collected in the secondary containment surrounding this unit. Several inorganics (chromium, nickel) were detected at elevated levels; however, all detected concentrations were below the EPA Region 3 Risk Based Concentrations (RBC) for Industrial Soil (Ref. 6). GE plans to conduct additional remedial activities in the area of SWMU 7 (which is immediately adjacent to the secondary containment unit) in the future (i.e., additional assessment, risk assessment, and or additional excavation) in order appropriately address all residual contamination (Ref. 6). GE recommended no further action for this unit. USEPA accepted the no further action proposal on May 5, 2001 (Ref. 6).

**SWMU 6, Wastewater Treatment Unit No. 2 (WWT-2) for Neutralization/Chemical Precipitation:** This unit consisted of an open aboveground 500-gallon tank. This unit was utilized from 1971 to December 1988, and was part of the facility's wastewater treatment system (SWMUs 5, 6, and 7). This unit was utilized for neutralization of the electroplating wastewaters and chromate reduction wastewaters (received from SWMU 5). Acidic wastes received in this

unit were be combined with non-chromate wastes (i.e., concentrated acid and/or alkali wastes) for treatment. Like SWMU 5, a subsurface secondary containment system resembling a basement surrounded this unit (Ref. 1). The Decontamination Summary Report for SWMUs 5, 6, and 7 (April 2001) documents the cutting, containerizing, and disposal of this unit. No known documented releases occurred at this unit. During the cutting and containerizing of this unit, the integrity of the secondary containment unit was inspected and deemed to be intact. No concrete or soil sampling is documented for this unit. GE recommended no further action for this unit. USEPA accepted the no further action proposal on May 5, 2001 (Ref. 6).

**SWMU 7, Wastewater Treatment Unit No. 3 (WWT-3) for Sludge Sedimentation (Sludge Settling Tank):** This unit consisted of a large underground reinforced concrete settling tank, with a capacity of 6,000 gallons. This unit was in service from 1971 to December 1988 and was part of the facility's wastewater treatment system (SWMUs 5, 6, and 7). This unit was utilized for removal of all the undesirable solids prior to a gradual metering of the neutral wastewater in the sewer system (Ref. 1). According to the RFA Report, wastewaters from this plant were monitored regularly to ensure appropriate constituent levels were being released to the municipal sewer. F006 sludge was generated during the sedimentation of the solids and was placed in 55-gallon drums and stored in CSA 1 (SWMU 2). This unit had no secondary containment system, with the exception of the reinforced concrete walls (Ref. 1). The Decontamination Summary Report for SWMUs 5, 6, and 7 (April 2001) documents the cleaning of the tank, the evaluation of its integrity, the demolition of the tank, and the concrete and soil sampling conducted at this unit. A total of 22 concrete samples were taken from this tank. Chromium and nickel were detected at elevated levels, however all detected concentrations were below the Region 3 RBCs for Industrial Soil. GE plans to conduct additional remedial activities at this unit in the future (i.e., additional assessment, risk assessment, and or additional excavation) in order appropriately address all residual contamination (Ref. 6).

**AOC A, Satellite Area for Destripping of Brass Pieces:** This area was utilized for destripping of brass pieces. This operation was performed in a small metal tank approximately every six months to a year. During the December 21, 1988, RFA site visit, the tank and an additional drum were found to be half full with tin sludge generated from this process. During a follow-up visit on February 9, 1989, this waste was found stored in containers in SWMU 2. The concern for this area was for the appropriate disposal of the tin sludge. No documented releases of material have occurred from this area (Ref. 1). However, the RFA Report recommended that Puerto Rico's Inspection, Monitoring and Surveillance section ensure that the tin sludge was disposed of properly. GE demolished and decontaminate this area as documented in the Plating Facility Cleanup Report submitted on October 6, 1993 (Ref. 6). Rinsate and wipe samples were collected after the decommissioning was completed. Based upon the sample results, GE has concluded that no further action is necessary for this area (Ref. 6). USEPA has concurred with this determination (Ref. 7).

**AOC B, Electroplating Area:** AOC B consisted of tanks area were electroplating operations were performed. The operation dates for this area were not available in facility documentation. During the RFA visual site inspection on December 21, 1988, and February 9, 1989, the bases of the tanks were observed to be corroded and the lines from most of the tanks were leaking. Nickel buildup was observed in the outlet of the nickel tank and on the concrete floor (Ref. 1). The RFA recommended that the Puerto Rico's Inspection, Monitoring and Surveillance section ensure that the corroded lines and tanks were repaired. GE demolished and decontaminated this area as documented in the Plating Facility Cleanup Report submitted on October 6, 1993 (Ref. 6). Rinsate and wipe samples were collected after the decommissioning was completed. Based

upon sample results, GE has concluded that no further action is necessary for this unit (Ref. 6). USEPA has concurred with this determination (Ref. 7).

In summary, all SMWUs and AOCs are closed and require no further action with the exception of additional activities that must be performed in the area of SWMU 7. Concrete and soil sample results collected in the area of SWMU 7 indicate that residual contaminant levels are below the Region 3 RBCs for industrial soil, and are thus not a concern for direct exposure based upon the current industrial use of this site. SWMU 1 has been the only identified potential source of groundwater contamination at the site. The network of eleven groundwater wells (10 shallow, 1 deep) located throughout the site were sampled as part of investigations associated with SWMU 1. Analytical results for the two sampling rounds that were conducted (December 1991, March 2000) indicated low levels of chlorinated hydrocarbons and total mercury were present in groundwater at the site. The detected levels were below the USEPA MCLs, and thus USEPA concluded that no further action was necessary for groundwater at this site.

**References:**

1. Letter from Ms. Flor L. del Valle, EQB Land Pollution Control Area, to Mr. Angel Chang, USEPA, re: RCRA Facility Assessment for Caribe GE Products, Inc. Dated May 10, 1989.
2. Supplemental Remedial Investigation (Final Draft), General Electric Wiring Devices Site, Juana Diaz, Puerto Rico. Prepared by Morrison Knudsen Environmental Services Group. Dated March 1993.
3. Region 2 RCRA Corrective Action Site Fact Sheet. Prepared by Mr. Samuel Ezekwo, USEPA. Dated February 10, 2000.
4. Remedial Action Report for General Electric Wiring Devices Site, Juana Diaz, Puerto Rico. Prepared by Metcalf & Eddy. Dated April 2000.
5. Final Closeout Report, GE Wiring Devices, Superfund Site, Juana Diaz, Puerto Rico. Prepared by USEPA. Dated June 20, 2000.
6. Letter from Mr. Rob Somers, Global Waste Manager, General Electric Company, to Mr. Sam Ezekwo, USEPA, re: Caribe GE Lighting's RCRA Corrective Action Status; Juana Diaz, Puerto Rico (with attachments). Dated June 8, 2001.
7. Teleconference between Sam Ezekwo, USEPA and Kristin McKenney, Booz Allen & Hamilton, re: Caribe GE Products, Inc. June 14, 2001.

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 | | X | | |
| Air (indoors)[2] | | X | | |
| Surface Soil (e.g., <2 ft) | | X | | |
| Surface Water | | X | | |
| Sediment | | X | | |
| Subsurface Soil (e.g., >2 ft) | | X | | |
| Air (Outdoor) | | 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:**

As discussed in response to Question No. 1, USEPA and EQB have determined that all SWMUs and AOCs at this site require no further action with the exception of SWMU 7 (and the immediate surrounding area) (Ref. 5). The facility is currently closed and all units (SWMUs and AOCs) have been removed from the site. During closure and decontamination of several SWMUs and AOCs (SWMUs 1, 2, 5, and 7; AOCs A and B), sampling was conducted, if deemed necessary. Sampling was not conducted in several areas (SWMUs 3, 4, and 6) based upon the historical information available for those units (i.e., types of wastes managed, integrity). Based upon available documentation and the results of previous investigations, groundwater, surface water, and sediment have not been impacted by activities at this facility. Results in the area of SWMU 7 (including the adjacent SWMU 5 area) have indicated residual contamination of chromium and nickel. However, the detected concentrations are below the Region 3

[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.

RBCs for Industrial Soil. GE plans to conduct additional investigations in this area to ensure that the proper closure of this unit occurs (Ref. 5). Given the lack of constituents in groundwater and the nature and concentrations of constituents in soil, elevated concentrations of contaminants in air (indoor and outdoor) is extremely unlikely.

There are currently no detected contaminants in any media at the site above relevant industrial risk-based levels. In addition, USEPA and EQB have concluded that no further action is required for all areas, except SWMU 7, at this site.

The site is currently secured by a chain link security fence and 24-hour security provided by an on-site security guard. Thus, the potential for off-site receptors gaining access to the property is unlikely. In addition, there are currently no industrial activities taking place at this site, and therefore there are no on-site receptors with the exception of the security guards (Ref. 5).

**References:**

1. Letter from Ms. Flor L. del Valle, EQB Land Pollution Control Area, to Mr. Angel Chang, USEPA, re: RCRA Facility Assessment for Caribe GE Products, Inc. Dated May 10, 1989.
2. Region 2 RCRA Corrective Action Site Fact Sheet. Prepared by Mr. Samuel Ezekwo, USEPA. Dated February 10, 2000.
3. Remedial Action Report for General Electric Wiring Devices Site, Juana Diaz, Puerto Rico. Prepared by Metcalf & Eddy. Dated April 2000.
4. Final Closeout Report, GE Wiring Devices, Superfund Site, Juana Diaz, Puerto Rico. Prepared by USEPA. Dated June 20, 2000.
5. Letter from Mr. Rob Somers, Global Waste Manager, General Electric Company, to Mr. Sam Ezekwo, USEPA, re: Caribe GE Lighting's RCRA Corrective Action Status; Juana Diaz, Puerto Rico. Dated June 8, 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 | Trespasser | Recreation | Food[3] |
|---|---|---|---|---|---|---|---|
| Groundwater | | | | | – | – | |
| Air (indoor) | | | | | – | – | – |
| Surface Soil (e.g. < 2 ft) | | | | | | | |
| Surface Water | | | – | – | | | |
| Sediment | | | – | – | | | |
| Subsurface Soil (e.g., > 2 ft) | – | – | – | | – | – | |
| Air (outdoors) | | | | | | – | – |

Instruction 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. These spaces instead have dashes ("--"). 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:**

This question is not applicable. See response to question #2.

[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 cannot 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:**

This question is not applicable. See response to question #2.

[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:**

This question is not applicable. See response to question #2.

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 Caribe General Electric Products, Inc. site, EPA ID# PRD090282757, located at P.R. Road 149 Km.67, Calle Carrion Maduro Final, in Juana Diaz, Puerto Rico, 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:** original signed by Date: 06/26/01
Kristin McKenney
Risk Assessor
Booz Allen & Hamilton

**Reviewed by:** original signed by Date: 06/26/01
Kathy Rogovin
Senior Risk Assessor
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**Also Reviewed by:** original signed by Date: 07/05/01
Sam Ezekwo, RPM
RCRA Programs Branch
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original signed by Date: 07/05/01
Sam Ezekwo, Acting Section Chief
RCRA Programs Branch
USEPA Region 2

**Approved by:** original signed by Date: 09/27/01
Raymond Basso, Chief
RCRA Programs Branch
USEPA Region 2

**Locations where references may be found:**

References reviewed to prepare this EI determination are identified after each response. Reference materials are available at the USEPA Region 2, RCRA Records Center, located at 290 Broadway, 15th Floor, New York, New York..

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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**

The following attachments have been provided to support this EI determination.

Attachment 1 - RCRA Corrective Action SWMUs and AOCs

Attachment 2 - General Site Layout Showing Monitoring Well Locations

Attachment 3 - Summary of Media Impacts Table

Attachments truncated, see facility file (MSS, 03/06/02)