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: **White Mop Wringer Company**
Facility Address: **Riverside Drive, Fultonville, NY 12072**
Facility EPA ID #: **NYD002076214**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X___ If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

_____ if data are not available skip to #6 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	_X_	___	___	__**Benzene, Chloroform Fluoride, Cyanide** ___
Air (indoors)[2]	___	_X_	___	_____
Surface Soil (e.g., <2 ft)	___	_X_	___	_____
Surface Water	___	_X_	___	_____
Sediment	___	_X_	___	_____
Subsurf. Soil (e.g., >2 ft)	___	_X_	___	_____
Air (outdoors)	___	_X_	___	_____

_____ 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):____

FACILITY DESCRIPTION

White Mop Wringer Company (WMW) is a manufacturing company which produces mop wringers, buckets, dust pans, mopping tanks and other receptacles. During manufacturing, products undergo steel cleaning, phosphatizing and zinc plating. On the southside of the facility, WMW had operated three surface impoundments. These surface impoundment were used to store treated wastewater from plating operation, tank cleaning, painting and steel phosphatizing. The surface impoundments were constructed and began operating in 1968. The surface impoundments served as holding basins for the treated wastewater prior to discharge to a drainage ditch along the southern boundary of the facility. The discharge to the ditch was regulated under a NYSDEC SPDES Permit.

Discharge to the Surface Impoundments ceased on April 1, 1986. In 1989, the surface impoundments were closed in accordance with a NYSDEC approved closure plan. Closure included the removal of sludge and contaminated soil in and around the impoundments, and placement of fill and a cover system over the area.

Regulatory History

In March 1991, the NYSDEC issued a Hazardous Waste Management Permit (No. 4-2728-9/33-0) that included provisions for RCRA Corrective Action. The company conducted soil and sediment investigations as directed by the permit. The company also implemented a post-closure monitoring program for the surface

impoundments. Based upon those investigations, the NYSDEC determined no further actions, other than the groundwater monitoring program, were required at the facility.

Data collected under the groundwater monitoring program indicate that the the plume of groundwater contamination is limited to the site (i.e. it does not flow off-site). As expected, once the impoundments were closed and the contaminated sludge and soils were removed, the concentration of hazardous waste constituents in the groundwater downgradient of the impoundments decreased substantially over time. At the present time, constituent concentrations are near or below New York State's groundwater quality standards. (See attached Figures that show the location of the facility and the trends in water quality.)

In August 1999, the NYSDEC issued a draft Order on Consent that will replace the Hazardous Waste Management Permit (No. 4-2728-9/33-0) which expired in 1996. The Order, which requires White Mop to continue the monitoring program for an additional four years, will take effect in October 1999.

No additional Corrective Measures are contemplated at this time.

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.

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	No	No	No	No	No	No	No
Air (indoors)	No	No	No	No	No	No	No
Soil (surface, e.g., <2 ft)	No	No	No	No	No	No	No
Surface Water	No	No	No	No	No	No	No

Sediment No	No	No	No	No	No	No	No
Soil (subsurface e.g., >2ft)	No	No	No	No	No	No	No
Air (outdoors)	No	No	No	No	No	No	No

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.

_X_ 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):__ **Contaminated soils and sludge were removed from the facility. Investigation of the other SWMUs at the facility indicated that there were no releases that exceeded the relevant action levels established by the NYSDEC.**

The facility is bounded by a fence to prevent unauthorized entry. The New York State thruway runs along the southern boundary of the facility where the plume of groundwater contamination exists. Pedestrian traffic on that limited access highway is not permitted, thus further restricting access to the contaminated groundwater.

Institutional controls (deed restrictions) have been implemented to ensure that the area in the vicinity of the former impoundments remains undisturbed.

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

4 Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status

code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):_____

"unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

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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):_____

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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):

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 **White Mop Wringer** facility, EPA ID #**NYD002076214**, located at **Fultonville,NY** 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 9/30/99
(print) William E. Wertz, Ph.D.
(title) Senior Engineering Geologist

Supervisor (signature) _____ Date 9/30/99
(print) Paul J. Merges
(title) Director, Bureau of Radiation &Hazardous Site Management
(EPA Region or State) NYSDEC

Contact telephone and e-mail numbers

(name) William E. Wertz
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e-mail) wewertz@gw.dec.state.ny.us

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.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: **White Mop Wringer Company**
Facility Address: **Riverside Drive, Fultonville, NY 12072**
Facility EPA ID #: **NYD002076214**

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?

_X___ 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).

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?

_X___ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.(**Benzene, Chloroform, Fluoride, Cyanide**)

_____ 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):____ **White Mop Wringer Company (WMW) is a manufacturing company which produces mop wringers, buckets, dust pans, mopping tanks and other receptacles. During manufacturing, products undergo steel cleaning, phosphatizing and zinc plating. On the southside of the facility, WMW had operated three surface impoundments. These surface impoundment were used to store treated wastewater from plating operation, tank cleaning, painting and steel phosphatizing. The surface impoundments were constructed and began operating in 1968. The surface impoundments served as holding basins for the treated wastewater prior to discharge to a drainage ditch along the southern boundary of the facility. The discharge to the ditch was regulated under a NYSDEC SPDES Permit.**

Discharge to the Surface Impoundments ceased on April 1, 1986. In 1989, the surface impoundments were closed in accordance with a NYSDEC approved closure plan. Closure included the removal of sludge and contaminated soil in and around the impoundments, and placement of fill and a cover system over the area.

Regulatory History

In March 1991, the NYSDEC issued a Hazardous Waste Management Permit (No. 4-2728-9/33-0) that included provisions for RCRA Corrective Action. The company conducted soil and sediment investigations as directed by the permit. The company also implemented a post-closure monitoring program for the surface impoundments. Based upon those investigations, the NYSDEC determined no further actions, other than the groundwater monitoring program, were required at the facility.

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

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)?

_X____ 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):____

Data collected under the groundwater monitoring program indicate that the the plume of groundwater contamination is limited to the site (i.e. it does not flow off-site). As expected, once the impoundments were closed and the contaminated sludge and soils were removed, the concentration of hazardous waste constituents in the groundwater downgradient of the impoundments decreased substantially over time. At the present time, constituent concentrations are near or below New York State's groundwater quality standards. (See attached Figures that show the location of the facility and the trends in water quality.)

In August 1999, the NYSDEC issued a draft Order on Consent that will replace the Hazardous Waste Management Permit (No. 4-2728-9/33-0) which expired in 1996. The Order, which requires White Mop to continue the monitoring program for an additional four years, will take effect in October 1999.

No additional Corrective Measures are contemplated at this time.

[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?

_X_ 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):___

Groundwater discharges to a drainage ditch which flows between the facility and the New York State Thruway. That ditch connects to a stream that flows into the Mohawk River approximately one mile from the facility. Soil samples from the ditch were collected as part of the facility investigation. The sampling results revealed no evidence of significant contamination by organic or inorganic constituents. The concentration of constituents was within the background levels established for the facility. (See attached Table, soil samples SB-02)

Given that the impoundments were used to manage treated wastewater and that the wastewater was previously discharged to the ditch under a SPDES permit, these findings were not surprising.

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] 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)?

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_X__ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] 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 judgement/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.

_____ 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 100 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):____**(See discussion in #4 above.)**

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

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])?

_____ 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] 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):____

[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.

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?"

X_ 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):

A recently completed Order on Consent requires White Mop to continue with a limited post-closure monitoring program. Details of the program follow:

Groundwater Monitoring and Response Program

1. On an annual basis, commencing in December 1998 and for four subsequent years, White Mop Wringer Company shall sample monitoring well MW-5 for the following parameters:

Benzene Chloroform Cyanide Fluoride

2. Sample collection and analyses shall be performed using the protocols previously employed for groundwater monitoring conducted under 6NYCRR Part 373 Permit No. 4-2728-9/33-0, or alternative protocols subsequently approved by the Department.

3. An Annual Report which includes the results of the sampling, and a comparison of the data with historical sampling results from the facility shall be submitted to the Department no later than April 1, of each year.

4. If after review of the monitoring data, the Department determines that the concentrations of the parameters in well MW-5 have increased substantially, or that their presence in the groundwater represents an unacceptable threat to human health and the environment, the Department may require the White Mop Wringer Company to take additional actions to address the impacts to groundwater quality associated with past use of the White Mop Wringer Company impoundments.

5. Construction, excavation or disturbance (other than routine maintenance) of the former surface impoundments is prohibited without the express written consent of the Department.

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).

_X_ 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 **White Mop Wringer facility , EPA ID # NYD002076214, located atFultonville, NY 12072.** 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.

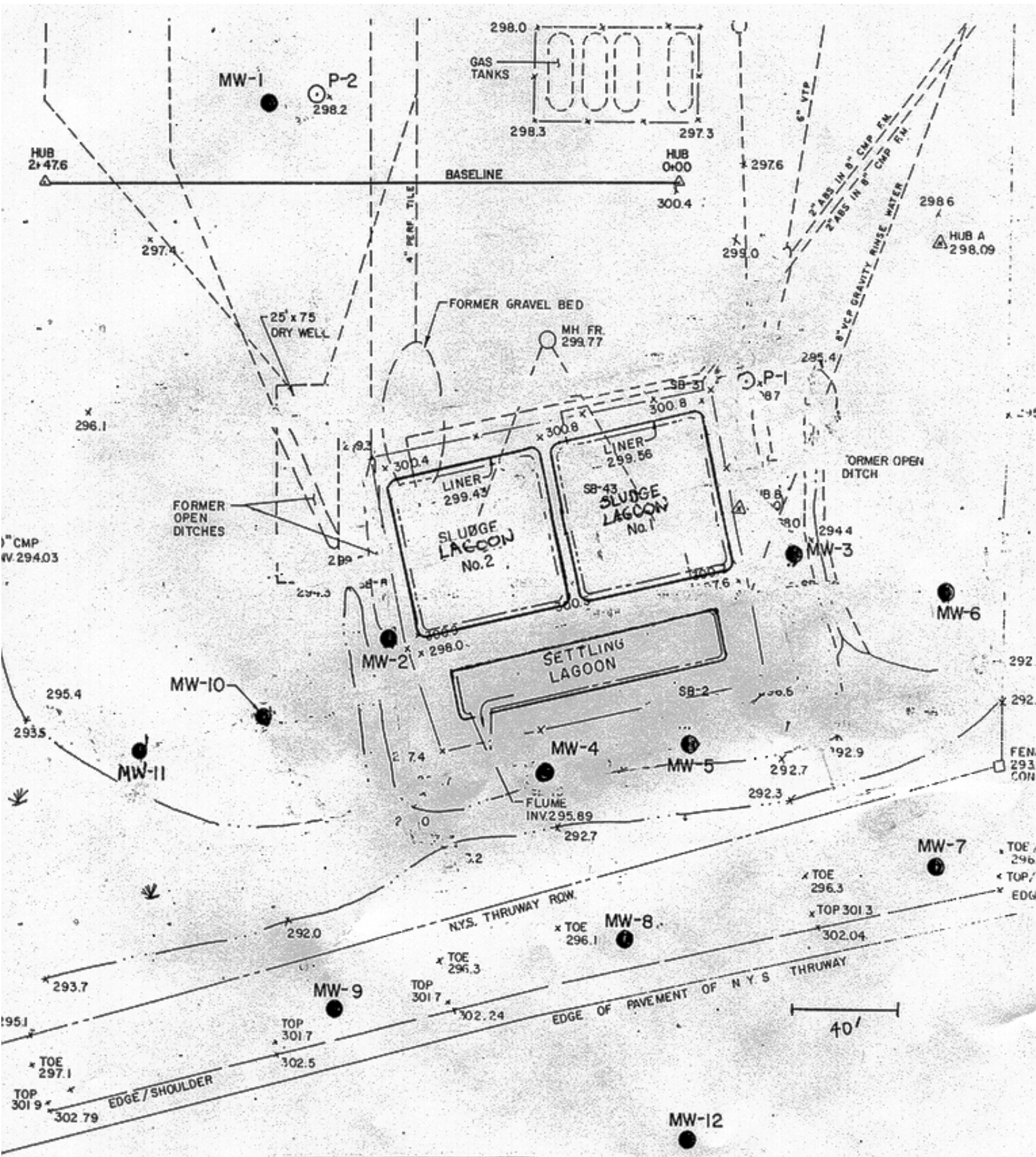
Completed by (signature) _____ Date 9/30/99
(print) William E. Wertz, Ph.D.
(title) Senior Engineering Geologist

Supervisor (signature) _____ Date 9/30/99
(print) Paul J. Merges
(title) Director, Bureau of Radiation &Hazardous Site Management
(EPA Region or State) NYSDEC

Locations where References may be found:
NYSDEC
Division of Solid & Hazardous Materials
Rm 460
50 Wolf Road
Albany NY 12233

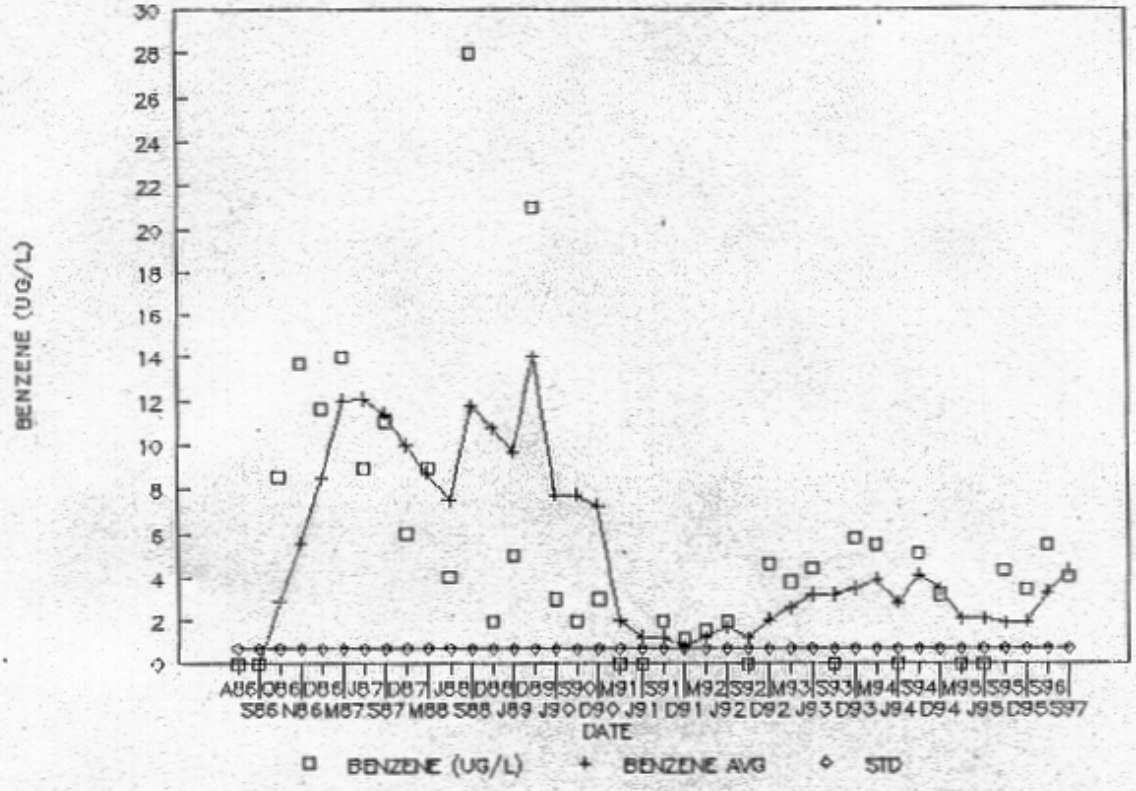
Contact telephone and e-mail numbers

(name)__William E. Wertz
(phone #)___(518) 457-9253
e-mail)_wewertz@gw.dec.state.ny.us

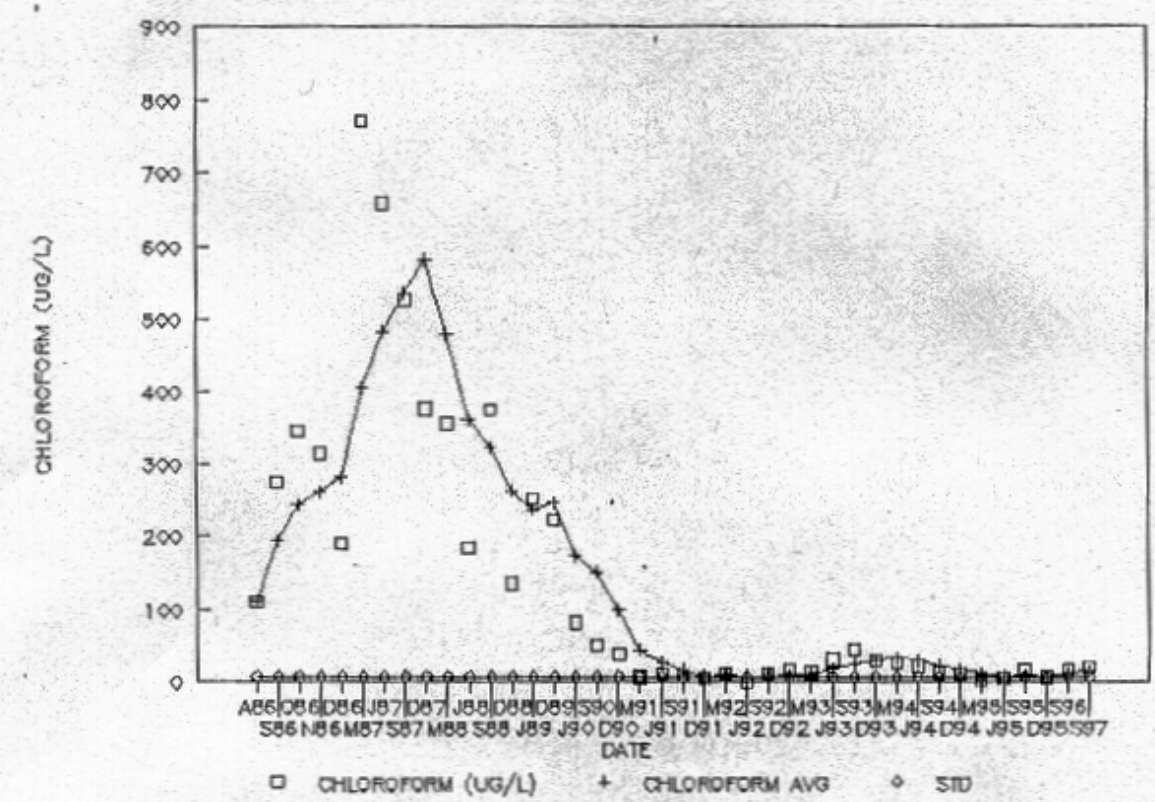


WHITE MOP WRINGER

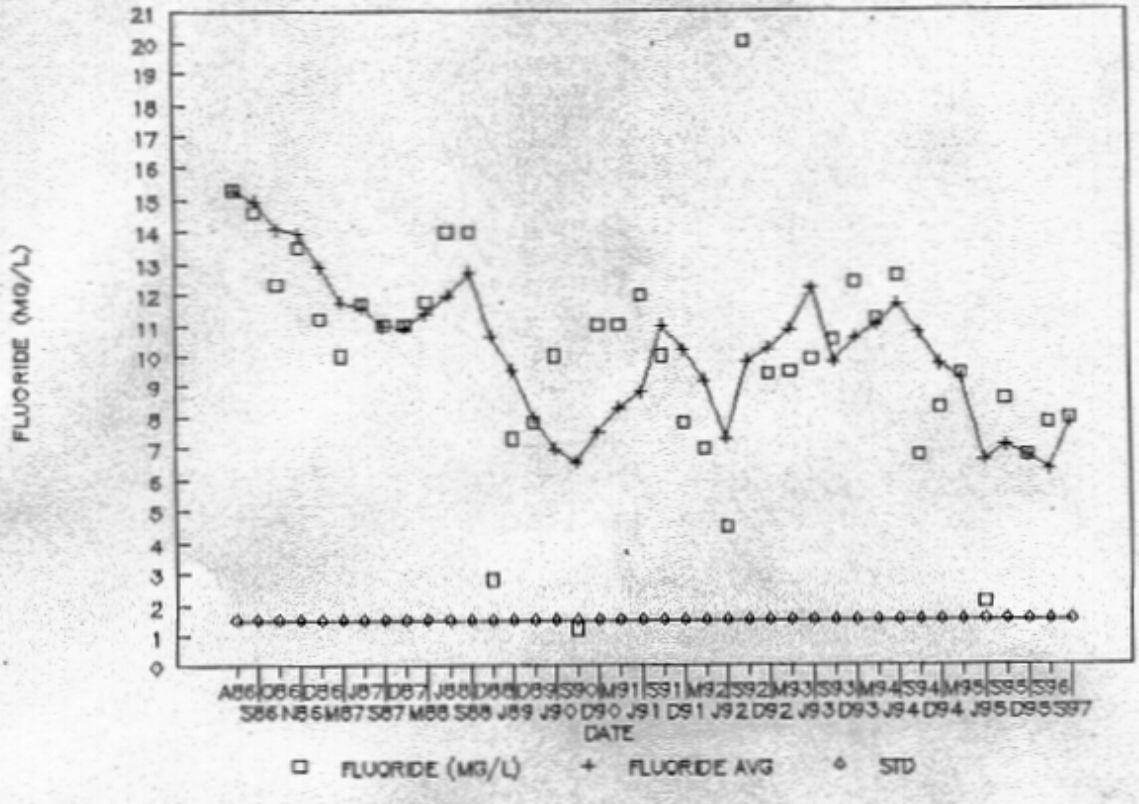
WELL 5 TRENDS



WELL 5 TRENDS



WELL 5 TRENDS



WELL 5 TRENDS