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:	CCL Custom Manufacturing, Inc.
Facility Address:	1 West Hegeler Lane, Danville, Illinois
Facility EPA ID #:	ILD005141726

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			Organics: 1,1-dichloroethene, cis-1,2-dichloroethene, tetrachloroethene, trichloroethene, 1,1,1-trichloroethane and vinyl chloride. (A)
Air (indoors)[2]	X			(B)
Surface Soil (e.g., <2 ft)	X			©
Surface Water		X		(D)
Sediment		X		(E)
Subsurf. Soil (e.g., >2 ft)	X			Metals: antimony, arsenic, barium, cadmium, chromium, copper, lead, manganese, nickel, selenium, thallium and zinc. Organics: acetone, aldrin, %-BHC, chlordane, 1,2-dichloroethene, methylene chloride, tetrachloroethylene, 1,1,1-trichloroethane and trichloroethene. ©
Air (outdoors)	X			(F)

____ 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):

(A) Rationale: The most recent groundwater monitoring data (2003) indicated detections of chloroform, dichlorodifluoromethane, 1,1-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, methylene chloride,

[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.

tetrachloroethene, 1,1,1-trichloroethane, trichloroethene, trichlorofluoromethane and vinyl chloride. Groundwater concentrations exceeded the IEPA Groundwater Quality Standards for Class II: General Resource Groundwater (Class II Groundwater Criteria) and Maximum Contaminant Levels (MCLs) for 1,1-dichloroethene, cis-1,2-dichloroethene, tetrachloroethene, trichloroethene, 1,1,1-trichloroethane and vinyl chloride.

The concentrations of hazardous constituents in groundwater samples collected on 6/27/03 are presented below.

Constituent	Highest concentration detected on 6/27/03 (Parts per billion)	Protective risk-based level: Maximum Contaminant Level (Parts per billion)
1,1,1-trichloroethane (TCA)	2,200	200
1,1-dichloroethane (DCA)	1,630	870*
1,1-dichloroethene	317	7
cis-1,2-dichloroethene	3,440	70
tetrachloroethene (PCE)	546	5
trichloroethene (TCE)	773	5
trichlorofluromethane	2,740	1300*
vinyl chloride	242	2

* Region 9 Preliminary Remediation Goal (PRG) is presented here because an MCL does not exist.

Reference: Groundwater Monitoring Report, Second Quarter 2003.

(B) Rationale: Indoor air monitoring data was not provided in the available file material. However, volatile organic compounds such as PCE, TCE vinyl chloride and trichlorofluoromethane are present in the groundwater at monitoring wells located near and upgradient of the building, it is reasonable to suspect that organic vapors might intrude into the main manufacturing building. Additionally, based on elevated groundwater concentrations of VOCs in the Tanker Truck Unloading Area, it appears likely that groundwater beneath the adjacent/downgradient building may be contaminated. Therefore, the potential exists for VOCs in groundwater to volatilize to indoor air.

Reference: Groundwater Monitoring Report, Second Quarter 2003.

(C) Rationale: The Corrective Measures Study (CMS) Report did not differentiate between surface and subsurface soils. Therefore, soils are evaluated as one media within this assessment.

Soils at Grid 213 in the Can Area, which borders the Slag Pile Areas, have been found to exceed the IEPA Tiered Approach to Corrective Action Objectives (TACO) ingestion criteria for arsenic and lead. Soils sampled in grids bordering the Slag Pile Areas were also found to exceed the TACO criteria for the Soil

Component of the Groundwater Ingestion Exposure Route for Class II Groundwater for antimony, arsenic, barium, cadmium, chromium, copper, lead, manganese, nickel, selenium, thallium and zinc. The CMS Report indicates that metals have not been detected in groundwater at levels of concern.

Soils in the Can Area have been found to exceed the TACO ingestion criteria for aldrin, chlordane, arsenic and lead. In addition, TACO criteria for the Soil Component of the Groundwater Ingestion Exposure Route for Class II Groundwater were exceeded for 1,2-dichloroethene, %-BHC, methylene chloride, tetrachloroethylene, arsenic, chromium, copper, lead, manganese and zinc. Soils were also found to exceed Region 9 Preliminary Remediation Goals (PRG's) for the Direct Contact Exposure Pathway under Industrial Land Use for the pesticides dieldrin (630 ug/kg - PRG=110ug/kg) and aldrin (380 ug/kg - PRG=100 ug/kg).

Soils in the Truck Scale Area were found to exceed the TACO ingestion criteria for tetrachloroethylene. Soil concentrations also exceeded the TACO inhalation criteria for Tetrachloroethylene and trichloroethene. TACO criteria for the Soil Component of the Groundwater Ingestion Exposure Route for Class II Groundwater were exceeded for acetone, 1,2-dichloroethene, methylene chloride, tetrachloroethylene, 1,1,1-trichloroethane and trichloroethene.

References: Updated Corrective Measures Study Report, dated January 2001, Tables III-1(a), III-1(b), and III-5.

(D) Rationale: Surface water sampling data was presented in the RCRA Facility Investigation Report (RFI Report). Samples collected in Lake Harry (a borrow pond) showed detections of 1,1-dichloroethene, cis-1,2-dichloroethene and 1,1,1-trichloroethane. Samples in the Fire Pond showed a detection of trichlorofluoromethane. All detections were below the Class II Groundwater Criteria and MCLs (where available). Therefore, surface water at the site is not expected to be contaminated.

Reference: RCRA Facility Investigation Report, Volume 2, dated November 28, 1995.

(E) Rationale: Sediment data was presented in the RFI Report. Sample results from the Fire Pond showed detections of 2-hexanone (21 ug/L) and acetone (13 ug/L). There are no TACO criteria for these two parameters, however the acetone detection is below Region 9 Preliminary Remediation Goals (PRGs) and Soil Screening Levels (SSLs). Therefore, sediment at the site is not expected to be contaminated.

Reference: RCRA Facility Investigation Report, Volume 2, dated November 28, 1995.

(F) Rationale: Ambient air monitoring data was not provided in the available file material. However, since VOC concentrations in soil exceeded the TACO inhalation criteria, it appears that outdoor air contamination could be possible due to volatilization from soils. Detected VOCs that exceeded TACO inhalation criteria include tetrachloroethylene and trichloroethene.

Reference: Updated Corrective Measures Study Report, dated January 2001, Table III-5.

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 (G)	No	No	No	Yes	No	No	No
Air (indoors) (H)	No	Yes	No	No	No	No	No
Soil (surface) (I)	No	Yes	No	Yes	No	No	No
~~Surface Water~~	No	No	No	No	No	No	No
~~Sediment~~	No	No	No	No	No	No	No
Soil (subsurface) (J)	No	Yes	No	Yes	No	No	No
Air (outdoors) (K)	Yes	Yes	No	Yes	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.

____ 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).

X 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):

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

Rationale and Reference(s):

Residents, Day Care, Trespassers, Recreation and Food:
All contamination is located within the facility boundaries, the entire site is fenced to prevent unauthorized access. No residences, day care centers, recreational opportunities, or food production activities exist within the facility boundaries. The closest residential population is located within one mile east of the facility.

Groundwater Pathway to Workers and Construction Workers
Incomplete human exposure pathways exist, resulting from the contamination of groundwater, soil and subsurface soil for the residents. A potential complete exposure pathway exist for worker receptor populations of CCL Custom Manufacturing Facility conducting landscaping or other work activities causing disturbance to surface soils at the Can and Truck Scale Areas. The seven units addressed as part of the RCRA Corrective Action include the following: Slag Pile Area, Land Treatment Area, Can Crusher Area, Can Area, Tanker Truck unloading Area (TTUA), and the Former Surface Impoundments. The groundwater at the CCL facility appear to meet a state of Illinois designation as a Class II aquifer system, which restricts usage of the groundwater underneath CCL to non-potable uses. Hence, the groundwater does not serve as a drinking source to the worker population.

Surface Soil and Subsurface Soil Pathway to Workers and Construction Workers
For the direct contact soil exposure pathway, CCL has constructed caps/covers over the all of the units of concern. The following briefly describes the covers/caps for each area of interest: 1) Land Treatment Area - 1ft thick clay/topsoil mixture, in addition part of the new building construction for the plant covers this area. None of the four constituents detected in the area soils i.e., methylene chloride, 1,1,1-trichloroethane, tetrachloroethane and acetone exceeded Region 9 PRG's. 2) Slag Pile Area - This area has been regraded and revegetated with a portion o the new building constructed over this area. 3) Can Crusher Area - No interim or final corrective measure was required for this area because detected VOC constituents did not exceed appropriate risk-based screening levels (Region 9 PRG's). 5) Tanker Truck Unloading Area (TTUA) - This area has been covered with approximately 18" of gravel. In addition, contaminated soils resulting from a 1986 PCE spill have been excavated. Subsequent sampling of subsurface soils for VOC's indicated that methylene chloride, acetone, 2-butanone, cis-1,2-dichloroethene, tetrachloroethene, trichlorofluoromethane, 1,1-dichloroethane and trichloroethene were all detected. However, none of the detected concentrations exceeded appropriate risk-based soil screening levels (region 9 PRG's). 6) Truck Scale Area - Soil and subsurface sampling of this area resulted in concentrations of PCE exceeding appropriate risk-based screening levels. Approximately 60 yd3 of contaminated soil have been removed in addition several feet of fill has been provided to serve as a road bed for trucks. 7) Surface Impoundments - The six surface impoundments have been certified by IEPA as RCRA closed. As apart of closure, the impoundments were drained and CCL dried, neutralized and stabilized part of the sludge. This area has been covered by a vegetated clay cap.

Surface Water and Sediment Pathway to Workers and Construction Workers
The Fire Pond and the Borrow Pond are the surface bodies on-site at the CCL Custom Manufacturing Facility. There is no reason to expect that Industrial workers and landscaping workers conducting normal operation and maintenance activities would be exposed to contaminated surface waters or sediments. Likewise, there is no reason to expect that construction projects involving contaminated surface water or sediments might occur in the near future.

Indoor Air Pathway to Workers
Volatile organic contaminants in the groundwater can evaporate into the pore spaces in the soil above the groundwater, and these contaminated soil gases might intrude into the main building, where industrial workers could be exposed to contaminated indoor air.

(G) Rationale: Groundwater contamination appears to be limited to on-site due to the groundwater interception system. Therefore, residents and food sources (from agriculture in the area) should not come into contact with contaminated groundwater. It is also unlikely that industrial workers would come into contact with contaminated groundwater. Therefore, the only complete pathway would be for construction workers to come into contact with contaminated groundwater during excavation or subsurface activities.

References: Groundwater Monitoring Report, Second Quarter 2003.
Updated Corrective Measures Study Report, dated January 2001, Section 2.2..

(H) Rationale: Groundwater contamination is limited to on-site. Therefore, it is unlikely that residents would come into contact with contaminated indoor air due to volatilization from groundwater. However, there is a potentially complete pathway for workers to come into contact with VOCs volatilizing from contaminated groundwater beneath the building into indoor air.

Reference: Groundwater Monitoring Report, Second Quarter 2003.

(I) Rationale: Soil contamination is limited to on-site soils. Therefore, residents and food sources (from agriculture in the area) would not be expected to be impacted by surface soil contamination. There would, however, be potentially complete pathways for industrial and construction workers to come into contact with contaminated surface soil particularly in the Can and Truck Scale Areas

References: Updated Corrective Measures Study Report, dated January 2001, Section 2.2 and Tables III-1(a), III-1(b), and III-5.

(J) Rationale: Soil contamination is limited to on-site soils. Therefore, it is unlikely that food sources (from agriculture in the area) would come into contact with contaminated subsurface soil. There is a complete pathway for construction workers to come into contact with subsurface soils during excavation or subsurface activities.

References: Updated Corrective Measures Study Report, dated January 2001, Section 2.2 and Tables III-1(a), III-1(b), and III-5.

(K) Rationale: There are potentially complete pathways for industrial and construction workers to come into contact with VOCs in outdoor air due to volatilization from soils on-site.

References: Updated Corrective Measures Study Report, Section 2.2 and Table III-5.

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."

X 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):

Worker exposure to Indoor Air:
The exposures of workers to contaminated indoor air are not reasonably expected to be significant because potential indoor air concentrations are within OSHA limits. CCL employees work in a building located near monitoring wells MW-4A and MW-4B. Most of the monitored contaminants in the ground water corresponding to wells MW-4A and MW-4B did not exceed the residential target ground water concentration related to target indoor air concentration where the soil gas to indoor air attenuation factor = 0.01 and partitioning across the water table obeys Henry's law (Vapor Intrusion Guidance, 2002). PCE, TCE, vinyl chloride and trichlorofluoromethane (264, 58.5, 3.2 and 25500 ppb respectively) in ground water exceeded the residential indoor air volatilization screening criteria. Since there is no offsite migration of contaminated groundwater, these contaminant levels were screened against the industrial ground water volatilization indoor air inhalation criteria (Michigan part 201generic clean up criteria (applicable to trichlorofluoromethane, groundwater target limit- 1100 ppm) and OSHA PEL (indoor air TWA concentration of PCE-100 ppm, TCE -100 ppm, VC- 0.5 ppm) and found to be within the respective regulatory limits.
In addition, a risk assessment was completed as part of the RFI which evaluates risk and hazard to a general plant worker, a maintenance worker performing routine maintenance and a maintenance worker performing construction activities. Risk and hazard were estimated in the RFI as follows:

General Plant Worker:
Hazard index, inhalation: <1
Carcinogenic risk, inhalation: 2×10^{-6}

[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.

Maintenance Worker, General:
Hazard index, inhalation: <1
Carcinogenic risk, inhalation: 1.8×10^{-6}

Worker exposure to Surface Soils and Subsurface Soils
The exposures of Industrial and Construction Workers to contaminated surface soils are reasonably expected to be significant for the direct exposure pathway at the Can Area and Truck Scale Areas. The RFI and CMS Reports documents soil concentrations of several pesticides including aldrin (380 ug/kg - PRG=100 ug/kg) and dieldrin (630 ug/kg - PRG=100 ug/kg) in the Can Area, specifically Grid 213.In addition, soil concentrations of tetrachloroethene and trichloroethene in the Truck Scale Area exceeded Region 9 PRG's. However, a site specific risk assessment was completed as part of the RFI which evaluates risk and hazard to a general plant worker, a maintenance worker performing routine maintenance and a maintenance worker performing construction activities. Risk and hazard were estimated in the RFI as follows:

Maintenance Worker, Construction Activity:
Can Area, excluding Grids 210, 213, & 216
Hazard index, inhalation, ingestion and dermal absorption: 2.3×10^{-7}
Carcinogenic risk, inhalation, ingestion and dermal absorption: 3.21×10^{-10}

Can Area Grids 210, 213 & 216
Hazard index, inhalation, ingestion and dermal absorption: 1.2×10^{-1}
Carcinogenic risk, inhalation, ingestion and dermal absorption: 1.76×10^{-5}

These results indicate that exposure to contaminants via the inhalation pathway does not result in significant risks for plant or maintenance workers under routine conditions. Similarly, exposures for a maintenance worker involved in construction activities is not expected to result in significant risk in most cases. The exception to this is exposure to contaminants in Can Area Grids 210, 213 and 216. The total risk estimated for a maintenance worker performing construction activities in this area is 1.76×10^{-5}. This result is greater than U.S. EPA's *de minimis* target risk of 1×10^{-6}, but is within the risk range provided in the National Contingency Plan of 10^{-6} to 10^{-4}. Therefore, based on the results of the risk assessment presented in the RFI, it is not anticipated that exposure to constituents in ambient air, soil or groundwater will result in significant cancer or noncancer risks to plant or maintenance workers.

References: RCRA Facility Investigation Report, Revised Report, dated March 1997, Section VIII F

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

X 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):

Construction Worker exposure to contaminated groundwater and subsurface soils:

Construction Workers must follow the requirements of CCL's Health and Safety Plan, which requires them to use appropriate personal protective equipment whenever it is necessary to excavate into contaminated subsurface soils or groundwater. Compliance with the Health and safety plan will prevent any unacceptable exposures.

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 CCL Custom Manufacturing Facility, EPA ID # _ILD 000 514 726 located at 1 West Hegeler Lane, Danville, IL. 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 _____
(print) _____
(title) _____

Supervisor (signature) _____ Date _____
(print) _____
(title) _____
(EPA Region or State) _____

Locations where References may be found:

USEPA Region V
WPTD Records Center
77 W. Jackson, Blvd
Chicago, IL. 60604

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.