

**Documentation of Environmental Indicator Determination
In Accordance with EPA Interim Final Guidance 2/5/99**

**RCRA Corrective Action
Environmental Indicator (EI) RCRA Info Code (CA750)
Migration of Contaminated Groundwater Under Control**

Facility Name: Cook Composites and Polymers Company (CCP)
Facility Address: 920 East 14th Street, North Kansas City, Missouri
Facility EPA ID #: MOD086787371

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

The Cook Composites & Polymers Company (CCP) facility has been in operation since 1914. The facility was originally known as Cook Paint and Varnish and was located on the northwest corner of Harrison Avenue (now Know Street) and 15th Street (now 15th Avenue). Ideal Manufacturing Company (which manufactured spark plugs and auto accessories) was located on the northwest corner of Harrison Avenue and 14th Street; a feed mill was located on the northeast corner of Charlotte Avenue (now Iron Street) and 14th Street; and Linde Air Products Company was located on the northwest corner of Charlotte Avenue and 14th Street. The remaining surrounding property was generally undeveloped and owned by the North Kansas City Development Company. By 1926, Cook Paint and Varnish had expanded south from its original location. The property occupied by Ideal Manufacturing became the Cook Paint and Varnish research building. By 1931, Cook Paint and Varnish occupied a two-block area between Jasper and Know Streets and from 14th to 16th Avenues. In 1928, North Kansas City changed street names to prevent confusion with Kansas City. By 1964, Cook Paint and Varnish occupied the entire area from 14th to 16th Avenues and from Know Street to the railroad tracks between Jasper and Iron Streets. I-29 was constructed immediately east of the site in the 1950s. Warehouse and/or office buildings were constructed to the north of the property between 1973 and 1979. Since 1990, CCP has operated as a joint venture with Total Composites, Inc. (TCI), which operates within the chemicals division of TOTAL, a French corporation. As a result of the acquisitions of PetroFina and Elf Aquitaine, CCP is now associated with the TOTAL chemical component, ATOFINA. Operations continue at the facility under the name of CCP (Burns & McDonnell, 2004).

The RCRA Facility Investigation (RFI) Report and Appendices (Burns & McDonnell, August 2004) provide a detailed description of the Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at the facility and a summary of the investigations conducted to date..

Definition of Environmental Indicators (for 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 “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 EIs 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 groundwater 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 Determination status codes should remain in RCRA Info national database ONLY as long as they remain true (i.e., RCRA Info 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 [e.g., Maximum Contaminant Levels (MCLs), the maximum permissible level of a contaminant in water delivered to any user of a public water system under the Safe Drinking Water Act]) 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.

_____ 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):

On December 31, 2001, Cook Composites and Polymers (CCP) entered into a Letter of Agreement (LOA) with the Department of Natural Resources’ Hazardous Waste Program (HWP). The HWP approved CCP’s initial RFI Work Plan on July 12, 2002. Two RFI field investigation phases were conducted, one in September 2002 and the second in February 2003. Groundwater sampling and analysis continued following completion of the two phases of fieldwork. The facility recently submitted its RCRA Facility Investigation (RFI) Report dated August 2004 (Burns & McDonnell, 2004). The RFI Report presents a complete review of previous investigations at the facility and the additional data collection efforts conducted to define the nature and extent of soil and groundwater contamination at all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). This information is summarized in Appendices A and B attached hereto. The RFI investigation conducted during September 2002 and February 2003 included the installation of 10 additional groundwater monitoring wells at the site and the sampling of on-site production wells and the newly-discovered Building 57 water well. Groundwater contamination was identified above potentially applicable levels during the RFI.

A list of the constituents that have been detected in groundwater, the highest concentrations detected, and appropriate regulatory criteria are included in the table below.

Comparison of Groundwater Contaminant Concentrations¹ with Screening Criteria

Analyte	Highest Concentration (mg/l)	Location	Date	MCL ² (mg/l)	EPA TAP ³ (mg/l)	CALM GTARC ⁴ (mg/l)
Benzene	0.074	MW-12	3-6-03	0.005	0.00034	0.005
1,4-Dioxane	380 EJ/3.2	MW-8	3-7-03/6-23-04	-	0.0061	0.003
Ethylbenzene	24	MW-10	3-6-03	0.7	0.0029	0.7
Methylene chloride	0.013	MW-9	6-22-04	0.005	0.0043	0.005
Styrene	0.14	MW-10	3-6-03	0.1	1.6	0.1
Toluene	0.28	MW-10	3-6-03	1.0	0.72	0.150
1,1,2,2-PCA	0.012	MW-9	3-6-03	0.0003	0.000055	0.0003
Trichloroethene	0.0055	MW-5	6-22-04	0.005	0.000028	0.005
Vinyl chloride	0.0038	MW-5	3-6-03	0.002	0.00002	0.002
Xylenes (total)	35	MW-10	3-6-03	10	0.21	0.32
Bis(2-eh)phthalate	0.051	MW2A dup	6-23-04	-	0.0048	0.006
Pentachlorophenol	2.9 ⁵	SE-D02	8-26-02	0.001	0.00056	0.001
Arsenic	0.390 ⁵	MW-9	3-6-03	0.01	0.000045	0.05
Chromium	0.180 ⁵	MW-3	3-6-03	0.1	55 ⁶	0.1
Lead	0.173 ⁵	MW-3	3-6-03	0.015	-	0.015
Manganese	12.8 ⁵	MW-3	3-6-03	0.3	0.88	0.05
Selenium	0.0711 ⁵	SE-D03	2-20-03	0.05	0.18	0.05

¹ RFI Report (Burns & McDonnell, 2004)

² Federal Drinking Water Standards and Health Advisories, EPA, Winter 2004

³ Preliminary Remediation Goals, EPA Region IX, October 1, 2002

⁴ Cleanup Levels for Missouri (CALM), September 2001

⁵ Indicates groundwater sample was unfiltered. Filtered concentrations at each location were lower than unfiltered for virtually all compounds.

⁶ Chromium III

Note: Groundwater results for samples collected from direct-push borings (e.g., SE-DO2 and SE-DO2) do not typically provide contaminant concentration information which is as representative of in-situ conditions as that obtained from monitoring wells.

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):

The RFI Report characterizes geology and hydrology of the site (Burns & McDonnell, 2004). Boring logs from the two on-site production wells indicate that alluvial deposits extend beneath the facility to a depth of approximately 100 ft. From the surface to approximately 5 ft. below ground surface (bgs), soils consist of disturbed silty or clayey soils with associated fill and debris. From 5 to 20 ft. bgs, the soil consists of silt, silty and/or sandy clay. Below 20 ft., deposits grade into a fine to medium sand with lignite and associated silt or clay seams to approximately 50 ft. From 50 ft. to approximately 100 ft. bgs, the alluvium consists of generally coarse sand with indication of large cobbles and boulders below 80 ft. Coarse sand and gravels exist near the alluvium/bedrock interface. Laboratory testing of undisturbed silty and silty sand samples from MW-3 and MW-5 from 12 to 18 feet bgs indicated a horizontal hydraulic conductivity ranging from 1.1E-4 cm/sec to 5.6E-4 cm/sec. Slug testing in MW-11 and MW-12 (screened interval from 20-35 feet bgs) indicated a horizontal hydraulic conductivity ranging from 1.1E-2 cm/sec to 1.3E-2 cm/sec.

The analytical results for soil contained in the RFI Report indicates that there are not any large areas of pervasive soil contamination related to releases at the facility. There are a few sporadic locations where soils are contaminated with Volatile Organic Compounds (VOCs) and Semi-Volatile Organic Compound (SVOCs) above conservative screening levels. At first glance, there are also several additional locations where soils appear contaminated with metals (principally manganese and selenium) above conservative screening levels (primarily CALM C_{leach} concentrations). However, upon closer examination, the majority of the metal concentrations are in the range of the site-specific background concentrations determined during the RFI and/or the range of background concentrations for agricultural soils in the area as presented in the Geochemical Survey of Missouri, Geological Survey Professional Paper 954-H,I, Tidball, Ronald R.; 1984. The majority of the soil areas demonstrating actual/potential impacts are paved with concrete/asphalt or a gravel cover is present. The presence of extensive, relatively impermeable surface coverings, when coupled with the

presence of an extensive on-site storm/surface water drainage/collection system and the age of the known contaminant releases, suggest that additional significant leaching of contaminants from soil to groundwater is highly unlikely (i.e., potential contributions to groundwater contamination from leaching of residually contaminated soils are not expected to significantly contribute to groundwater plume concentrations or plume expansion).

Regional groundwater flow within the alluvium is towards the Missouri River. The CCP facility is centrally located inside a meander loop of the Missouri River, roughly 3000 feet from the river at its closest point. Site-specific groundwater flow is generally toward the southeast to southwest, varying with rainfall and river stage (Burns & McDonnell, 2004). The groundwater gradient is relatively flat according to water level data collected at the facility. Groundwater elevations maps from data collected from March 2003 to June 2004 are provided in Appendix C attached hereto. Since the saturated unconsolidated materials beneath the facility are relatively coarse-grained, groundwater recharge to the monitoring wells is fairly rapid.

Groundwater data are provided in Figures 6-4, 6-5 and 6-6 (Appendix D). The analytical results for groundwater indicate that there are not any large areas of pervasive VOC and SVOC groundwater contamination; however, there are a few sporadic locations where groundwater is contaminated with these compounds above conservative screening levels. On the face of it, metals contamination in groundwater appears to be more widespread; however, the RFI results for total (unfiltered) versus dissolved (filtered) groundwater samples from the same wells on the same date suggest that much of the apparent metals “contamination” is due to the suspension of metal-containing soil particulates in the unfiltered samples. Once digested with acid during sample preparation, the metals associated with the soil particulates became “dissolved” in the sample extract and hence show up in the analysis results. Ultimately, this results in the unfiltered metals concentrations in groundwater being biased on the high (conservative) side. Significant colloidal transport in the groundwater of metals associated with/sorbed to the soil particulates is unlikely, hence the measured concentrations of total metals do not accurately represent metal fractions that are mobile in the groundwater. A few of the filtered (dissolved) groundwater samples have shown metals concentrations (chiefly manganese with a couple of instances of arsenic, barium and selenium) above conservative screening levels,; however, these metals are not known to have been associated with historical activities or releases at the facility and may simply be present as a function of naturally occurring subsurface conditions.

To date, there is not enough sampling data to confirm definitive trends in groundwater contaminant levels. There is; however, evidence of stabilized plume conditions. As indicated above in the discussion relating to impacted soil, significant leaching of contaminants to groundwater from residually contaminated soil appears unlikely. The presence of some metals in groundwater above screening levels as depicted in Appendix D, Figure 6-4 appears to be largely a function of suspended soil particulates in the groundwater samples and naturally occurring levels of those metals in the soil.

There are very few locations where SVOCs are present above screening levels as depicted in Appendix D, Figure 6-6. Bis(2-ethylhexyl)phthalate appears to be present in groundwater at relatively low levels in a couple of locations; however, its presence in some of the SVOC method blanks for soil raise suspicions that its apparent presence in groundwater may in some way be laboratory-related as this compound is a common laboratory contaminant. The isolated, seemingly anomalous detection of pentachlorophenol above screening levels in a groundwater sample obtained from direct push boring SE-D02 has not been explained; however, this compound is not known to have been managed at the site and has been below analytical detection limits in all other groundwater samples obtained from direct push borings and monitoring wells. This suggests that even if pentachlorophenol is locally present, its presence is insignificant insofar as continued migration is concerned.

There are a few locations where VOCs are present above screening levels as depicted in Appendix D, Figure 6-5. No widespread VOC contamination in groundwater is evident. VOC concentrations in wells comprising the perimeter of the monitoring system are below risk-based screening levels with the exception of MW-5 and MW-12. VOC contamination in MW-5 to the west and MW-12 to the south, generally downgradient of interior site areas showing greater VOC impacts, has inconsistently been slightly above risk-based screening levels. During the latest sampling event (June 2004), only MW-5 showed one VOC (Trichloroethene) above its respective screening level (5.5 ug/l versus a screening level of 5.0 ug/l). The presence of VOCs in wells comprising the perimeter of the monitoring system, including MW-5 and MW-12, appears to be residual contamination from historical releases. Based on the facility-wide groundwater monitoring conducted to date, there is no evidence of any sort of pervasive VOC groundwater plume(s). Overall, the groundwater sampling results and water level data (relatively flat gradient) collected to date reinforce that contaminants are attenuating with distance from known or suspected source areas interior to the site. Periodic pumping of groundwater from Production Well #1 (which is interior to the current monitoring well network) for non-contact cooling water may also have an incremental influence in controlling contaminant migration although the degree of that influence is currently unknown.

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?

_____ If yes - continue after identifying potentially affected surface water bodies.

 X 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):

The Missouri River is approximately 3,000 feet south of the facility. Monitoring well data discussed above do not indicate that contaminated groundwater has the potential to migrate off-site and discharge to the Missouri River. There are no other surface water bodies in the vicinity of the facility. The August 2004 RFI Report should be consulted for additional supporting information on this topic.

5. Is the **discharge** of “contaminated” groundwater into surface water likely to be **“insignificant”** (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times the appropriate groundwater “level,” and there are no other conditions (e.g., the nature or 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)?

_____ If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ 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 concentration³ 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 concentrations³ greater than 100 times the 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):

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 implemented⁴)?

_____ 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 specialist(s), 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 cannot 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):

On September 27 and 28, 2004 Burns & McDonnell planned to conduct a third quarterly round of site-wide groundwater sampling at the CCP facility. Groundwater samples are scheduled to be analyzed for VOCs, SVOCs, 1,4-dioxane, and total and dissolved metals. 1,4-dioxane will be analyzed by a modified SW846 8270 method with Single Ion Monitoring (SIM) to achieve more accurate quantitation and lower reporting limits. Quarterly groundwater monitoring is expected to continue until at least four quarters of site-wide data is collected. Thereafter, the monitoring results will be reviewed and the monitoring program will be modified, as appropriate, to reflect ongoing data collection needs and objectives relevant to the formulation and assessment of remedial alternatives for groundwater as part of a Corrective Measures Study. Once a final remedy is selected, it is expected that groundwater monitoring will continue on some appropriate site-specific frequency until it is demonstrated that the site-specific groundwater cleanup objectives have been met.

8. Check the appropriate RCRA Info 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 Cook Composites & Polymers facility, EPA ID # MOD086787371, located at 920 East 14th Street, North Kansas City, Missouri. 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) original signed by Richard A. Nussbaum Date 9/30/04
(Print) Richard A. Nussbaum, P.E., R.G.
(Title) Chief, Corrective Action Unit
(EPA Region or State) Missouri Department of Natural Resources,
Hazardous Waste Program

Supervisor: (Signature) original signed by Richard A. Nussbaum Date 9/30/04
(Print) Richard A. Nussbaum, P.E., R.G.
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(EPA Region or State) Missouri Department of Natural Resources,
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Locations where References may be found:

U. S. Environmental Protection Agency - Region 7
Records Center
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Kansas City, Kansas 66101

or

Missouri Department of Natural Resources
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References:

1. Burns & McDonnell, August 2004. RCRA Facility Investigation Report, Cook Composites & Polymers Co.
2. MDNR. September 2003. RCRA Corrective Action Environmental Indicator (EI) Info Code (CA 750) Migration of Contaminated Groundwater Under Control.

Appendix A

**Table 1-1
SWMU/AOC Descriptions**

**Figure 1-1
Site Location Map**

**Figure 1-3
SWMU/AOC Locations**

Appendix B

Description of Previous Investigations and Removals (See Section 4.0 of RCRA Facility Investigation Report dated August 2004)

Appendix C

Groundwater Elevation Maps (Figures 2-9 through 2-14)

Appendix D

**Groundwater Data
(Figures 6-4 through 6-6)**