

Documentation of Environmental Indicator Determination
Interim Final 2/5/99
RCRA Corrective Action
Environmental Indicator (EI) RCRA Info code (CA725)
Current Human Exposures Under Control

Facility Name: Wilson Jones Company (formerly Acme Visible Records)
Facility Address: 1000 Allview Drive, Crozet, VA 22932
Facility EPA ID #: VAD003124989

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

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

If no - re-evaluate existing data, or

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

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

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

Definition of "Current Human Exposures Under Control" EI

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

Relationship of EI to Final Remedies

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

Duration / Applicability of EI Determinations

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

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

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	✓	—	—	Metals, VOC
Air (indoors) ²	✓	—	—	VOC
Surface Soil (<2 ft)	✓	—	—	VOC
Surface Water	✓	—	—	Metals, VOC
Sediment	✓	—	—	Metals, VOC
Subsurf. Soil (>2 ft)	✓	—	—	Metals, VOC,
Air (outdoors)	✓	—	—	VOC

_____ 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 and Reference(s):

See attached page

("Unknowns" are carried through with "Yes" determinations to ascertain what information is needed or if risks are negligible.)

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.

Site Description

The Wilson Jones Company facility (formerly Acme Visible Records (AVR)) is located on 62 acres of land approximately one mile east of the Town of Crozet, in Albemarle County, Virginia. Powell's Branch, a tributary to Lickinghole Creek, is located along the southwestern portion of the site. The Wilson Jones facility began operating in 1954. In 1988 the building assets were sold and metal-handling operations ceased. Office storage and retrieval equipment continued to be manufactured until 1992 when the property was purchased a second time by Wilson Jones Corporation. There are currently no manufacturing operations present on-site.

The Wilson Jones site is traversed by railroad tracks owned by the Chesapeake and Ohio Railway Company. The main manufacturing building, which has undergone several expansions since being erected in 1950, is located on the northern portion of the site. The former wastewater lagoon is located on the southern portion of the site. While in operation, industrial wastewaters, both process and non-process, were routed to the 1.6-acre wastewater lagoon. Throughout the history of manufacturing operations undocumented spills and leaks of chlorinated solvents occurred. Environmental site assessments were performed in 1989 and 1993 that focused efforts at the wastewater lagoon and incineration ditches. The 1993 site assessment indicated potential contamination in and around the former metal fabrication building. Additional data were collected in 2005-2006 to further investigate the possible source area under the former metal fabrication area with elevated concentrations of chlorinated solvents identified in the soil borings and ground water samples.

1. Groundwater – YES

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE: Facility groundwater monitoring activities have identified elevated concentrations of inorganic and organic constituents in groundwater in the immediate vicinity of the former wastewater lagoon closed as a landfill and the source area beneath the metal fabrication building floor. Groundwater monitoring wells are located to identify potential releases from the regulated unit and facility SWMUs. The facility has chosen to implement interim measures in the recently discovered source area beneath the manufacturing floor. Interim measures will consist of a soil vapor extraction system on contaminated soil and a groundwater recirculation system for the saturated zone to enhance in-situ microbe activity.

2. Air (indoors) – YES

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE: Direct measurements of indoor air quality or soil gas have not been made at the facility. With existing groundwater data indicating there have been exceedances of MCLs for TCE and Vinyl Chloride (volatile organic constituents) in groundwater at the facility and with the discovery of the high level of contamination in the source area underneath the metal fabrication building, the conservative assumption that indoor air concentrations may be above acceptable levels must be made. The determination is based upon assumed partitioning of groundwater concentrations to air and draft EPA guidance for soil vapor intrusion located at <http://www.epa.gov/epawaste/hazard/correctiveaction/eis/vapor/complete.pdf>.

3. Surface Soil – YES

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE: The recent 42 soil borings performed to determine the extent of contamination underneath the former metal fabrication area show high levels of contamination within the surface soil. Known potential sources of soil contamination, outside of the facility, are below grade (incineration ditches) or beneath a RCRA C cap (closed surface impoundment); therefore, surface soil contamination is not known to be present in these areas.

4. Surface Water – YES

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE: TCE greater than 1,000 ug/l was detected in the upper reaches of Powell's Branch creek along the southwest portion of the site from sample location SW-1B. Concentrations diminished to below the applicable surface water standards prior to exiting the site, 1.2 ug/l from SW-3 (Human Health Surface Water Standard, 810 ug/l). No volatile organic constituents were detected in the stream located southeast of the facility from three samples.

5. Sediment – Yes

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE: Sampling of the sediment at the facility has not occurred. With existing sampling data from surface water showing levels of 1,000 ug/l of TCE the conservative assumption of sediment constituents of concern concentrations may be above acceptable levels must be made.

6. Subsurface Soil – YES

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE: The recent 42 soil borings performed to determine the extent of contamination underneath the former metal fabrication area show high levels of contamination within the subsurface soil. The surface impoundment closed with wastes in place and the incinerator trenches have not been closed or completely evaluated. Data from the 1988 investigation reports concentrations in samples from test pits in excess of the Residential RBC for benzene. In addition, test pit and soil boring data from the 1991 investigation at the incineration trenches showed concentrations for naphthalene, bis(2-ethylhexyl)phthalate, barium, arsenic and lead above both Residential and Industrial RBC values.

7. Air (outdoors) – YES

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE: Historic Concentrations of TCE and its daughter products have exceeded their respective MCLs in monitoring wells down gradient of the regulated unit. The proximity of soil borings SB-1, SB-2 and SB-3 to the south wall of the former metal fabrication area building indicate high levels of contamination may have extended out past the physical boundaries of the building. The appropriate conservative assumption that air concentrations may be above acceptable levels must be made. Because no direct measurements of outdoor air or soil gas have been made, this determination is based on assumed partitioning of groundwater concentrations to air standards. The presence of contaminants in surface soil may also contribute towards re-suspension of contaminants in outdoor air.

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3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

<u>Contaminated Media</u>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Air (indoors)	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Soil (surface, e.g., <2 ft)	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Surface Water	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Sediment	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Soil (subsurface e.g., >2 ft)	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Air (outdoors)	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>

Instructions for **Summary Exposure Pathway Evaluation Table**:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.
2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- _____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).
- ✓ _____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.
- _____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

- Groundwater – see attached page, Item #1
- Air (Indoors) – see attached page, Item #2
- Soil (surface) - see attached page, Item #3
- Surface Water -- see attached page, Item #4
- Sediment (surface) - see attached page, Item #5
- Soil (subsurface) – see attached page, Item #6
- Air (Outdoors) – see attached page, Item #7

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

Section 3 attachment – Rationale and References

1. Groundwater

REFERENCE: : 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

Residents

NO – There is no information indicating the presence of residents on the facility. The contaminated groundwater is present within the facility boundary. There are no drinking water wells in the surrounding community and the nearby community is supplied with city water.

Workers

NO – The facility is not currently active and has no workers to be exposed to groundwater.

Day-Care

NO – There is no information indicating the presence of a day-care on the facility. . The contaminated groundwater is present within the facility boundary. There are no drinking water wells in the surrounding community and the nearby community is supplied with city water.

Construction

YES – The workers at the facility may potentially be exposed to groundwater if construction activities require them to excavate down to the groundwater table. Construction activities would be covered by the facility's health and safety plan and will be trained to perform the job duties and use of PPEs. Currently, there are planned construction activities at the facility for the construction of the interim measures remediation projects. Therefore, exposure to groundwater is considered to be under control.

Trespassers

NO – The facility is located in an industrial area with a fence surrounding the property which restricts access to trespassers.

Recreation

NO – There is no information indicating that any portion of the facility is for recreational use.

Food

NO – There is no information indicating that food is grown within the facility's boundary.

2. Air (Indoors)

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE:

Residents

NO – There is no information indicating the presence of residents on the facility.

Workers

NO - The facility is not currently active and has no workers to be exposed to indoor air.

Day-Care

NO -- There is no information indicating the presence of a day-care on the facility.

Section 3 attachment – Rationale and References

Construction

YES – The workers at the facility may potentially be exposed to indoor air that may be high in contaminant concentrations during construction activities if required to excavate to the groundwater table. Construction activities would be covered by the facility's health and safety plan and construction workers will be trained to perform the job duties and use of PPEs. Currently, there are planned construction activities at the facility for the construction of the interim measures remediation projects. Therefore, exposure to contaminated indoor air is considered to be under control.

Trespassers

NO – The facility is located in an industrial area with a fence surrounding the property thereby restricting access to trespassers.

Recreation

NO – There is no information indicating that any portion of the facility is for recreational use.

Food

NO – There is no information indicating that food is grown within the facility's boundary.

3. Soil (surface)

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE:

Residents

NO – There is no information indicating the presence of residents on the facility.

Workers

NO – The facility is not currently active and has no workers to be exposed to surface soils that may be high in contaminant concentrations and fugitive dust arising from the surface soils.

Day-Care

NO – There is no information indicating the presence of a day-care on the facility.

Construction

YES – Construction workers may potentially be exposed to surface soils that may be high in contaminant concentrations and fugitive dust arising from the surface soils. However, construction workers should be protected by a Health and Safety Plan and will be trained to perform the job duties and use of PPEs. Currently, there are planned construction activities at the facility for the construction of the interim measures remediation projects. Therefore, exposure to contaminated indoor air is considered to be under control.

Trespassers

NO – The facility is located in an industrial area with a fence surrounding the property thereby restricting access to trespassers.

Recreation

NO – There is no information indicating that any portion of the facility is for recreational use.

Food

NO – There is no information indicating that food is grown within the facility's boundary.

4. Surface Water

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE:

Residents

NO – There is no information indicating the presence of residents on the facility. Concentrations of contaminant detected in the Powell's Branch creek along the southwest portion of the site are below the applicable surface water standards prior to exiting the site. No volatile organic constituents were detected in the stream located southeast of the facility.

Workers

NO – The facility is not currently active and has no workers to be exposed to surface water.

Day-Care

NO – There is no information indicating the presence of a day-care on the facility.

Construction

NO – There are no planned construction activities in or around an area of contaminated surface water.

Trespassers

NO – The facility is located in an industrial area with a fence surrounding the property thereby restricting access to trespassers.

Recreation

NO – There is no information indicating that any portion of the facility is for recreational use. Also, concentrations of contaminant detected in the Powell's Branch creek along the southwest portion of the site are below the applicable surface water standards prior to exiting the site. No volatile organic constituents were detected in the stream located southeast of the facility.

Food

NO – There is no information indicating that food is grown within the facility's boundary.

5. Sediment (surface)

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE:

Residents

NO – There is no information indicating the presence of residents on the facility.

Workers

NO – The facility is not currently active and has no workers to be exposed to contaminated sediment.

Day-Care

NO – There is no information indicating the presence of a day-care on the facility.

Construction

NO – There are no planned construction activities in or around any area where contaminated sediment may be located.

Trespassers

NO – The facility is located in an industrial area with a fence surrounding the property thereby restricting access to trespassers.

Recreation

NO – There is no information indicating that any portion of the facility is for recreational use.

Food

NO – There is no information indicating that food is grown within the facility's boundary.

6. Soil (subsurface)

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE:

Residents

NO – There is no information indicating the presence of residents on the facility.

Workers

NO – The facility is not currently active and has no workers to be exposed to contaminated subsurface soil.

Day-Care

NO – There is no information indicating the presence of a day-care on the facility.

Construction

YES – Construction workers performing excavation activities may potentially be exposed to subsurface soils that may be high in contaminant concentrations. However, construction workers should be protected by a Health and Safety Plan and will be trained to perform the job duties and use of PPEs. Currently, there are planned construction activities at the facility for the construction of the interim measures remediation projects. Therefore, exposure to contaminated subsurface soil is considered to be under control.

Trespassers

NO – The facility is located in an industrial area with a fence surrounding the property thereby restricting access to trespassers.

Recreation

NO – There is no information indicating that any portion of the facility is for recreational use.

Food

NO - There is no information indicating that food is grown within the facility's boundary.

7. Air (outdoors)

REFERENCE: 1) *Post-closure Permit, issued June 1999* 2) *Post-closure Care Compliance Monitoring report, dated May 2004* 3) *2001 Annual Report, existing monitoring information* 4) *Interim Measures Project Management Plan – Rev. 1, dated March 2008* 5) *Phase I RCRA Facility Investigation Workplan – Rev. 1, dated November 2006*

RATIONALE:

Residents

NO – There is no information indicating the presence of residents on the facility.

Workers

NO – The facility is not currently active and has no workers to be exposed to contaminated outdoor air.

Day-Care

NO – There is no information indicating the presence of a day-care on the facility.

Construction

YES – The workers at the facility may potentially be exposed to outdoor air that may be high in contaminant concentrations during construction activities if required to excavate to the groundwater table. Construction activities would be covered by the facility's health and safety plan. Currently, there are planned construction activities at the facility for the construction of the interim measures remediation projects. Therefore exposure to contaminated indoor air is considered to be under control.

Trespassers

NO – The facility is located in an industrial area with a fence surrounding the property thereby restricting access to trespassers.

Recreation

NO – There is no information indicating that any portion of the facility is for recreational use.

Food

NO – There is no information indicating that food is grown within the facility's boundary.

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

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 expected not to be "significant."

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

Rationale and Reference(s):

The construction personnel in this work environment are protected under the OSHA standards. Exposure to contaminated groundwater, indoor air, surface soils, subsurface soils and outdoor air is considered minimal since any construction personnel working in the construction area would have to follow the facility's health and safety plan which would limit any such exposure. (See Responses To Item No. 3.)

Reference: : 1) Post-closure Permit, issued June 1999 2) Post-closure Care Compliance Monitoring report, dated May 2004 3) 2001 Annual Report, existing monitoring information 4) Interim Measures Project Management Plan – Rev. 1, dated March 2008 5) Phase I RCRA Facility Investigation Workplan Rev. 1, dated November 2006

⁴ If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

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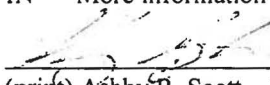
6. Check the appropriate RCRA Info status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Wilson Jones, Inc. facility, EPA ID # VAD003124989, located Crozet, Virginia, 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


(print) Ashby R. Scott

Date 9/23/08

(title) Environmental Engineer Sr.

Supervisor


(print) Leslie A. Romanchik
(title) Director, Office of Hazardous Waste
(EPA Region or State) VA DEQ

Date 9/23/08

Locations where References may be found:

VA Department of Environmental Quality, Office of Hazardous Waste

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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.