EPA Request
Wayne Dresser RCRA Corrective Action Facility
Salisbury, Maryland
June 2014

This document is intended to be used in conjunction with the Summary Chart to support reaching a draft RCRA Corrective Action decision which will fully protect human health and the environment from any release at and/or from the Wayne Dresser RCRA Corrective Action Facility in Salisbury, Maryland.

The Summary Chart describes solid waste management units (SWMUs), areas of concern (AOCs), environmental investigation reports/information, and environmental pathways identified to EPA to date and includes location specific requests for information associated with the potential for release.

This document describes general information requests and general comments intended to support and document the investigations at the facility to reach a RCRA Corrective Action Remedy decision which will fully protect human health and the environment, as defined by site and/or SWMU and/or AOC specific corrective action objectives for the impacted media (i.e. soil, groundwater, soil vapor/vapor intrusion).

DII is requested to use these documents to guide the development of future work and submittals.

The process applied in developing these documents generally is consistent with the approach described in the template for the corrective action lean program. EPA is open to having a discussion with DII to discuss utilizing the newly developed Corrective Action lean tools, which EPA Region 3 is piloting as the framework to move investigations and documentation forward, as well as to discuss any questions about the summary chart and/or work request. (Refer to http://www.epa.gov/epawaste/hazard/correctiveaction/lean_effort.htm)

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1. Overarching Goal for Investigation:

For each potential release (including each potential release associated with each area and/or feature identified in any investigation, evaluation, chart, photograph and/or figure/drawing by EPA, MDE, and/or by any operator and/or owner which has been associated with the RCRA Corrective Action Facility, including locations where it was determined that no further characterization was warranted), determine whether the characterization of the release has been completed sufficient to develop a justifiable and effective remedy decision that meets Corrective Action Objectives which are fully protective of human health and the environment.

Understand that if property history and/or industry history suggests a release may be present and/or may occur and the proposed remedy decision does not address such release, then comprehensive and sufficient information must be gathered to demonstrate whether release does not pose an unacceptable risk.

All available applicable data (Dresser, DII, etc., comprehensive analyses, characteristic data) and anecdotal information associated with release conditions that remain at the site should be described and considered with respect to identifying potential unacceptable exposures and, where applicable, determining remediation levels.

2. RCRA Corrective Action Facility Wide (all features, remaining features, fill):

Develop a figure or figures which depict each current and historic feature, including each feature identified and/or described in the summary chart. Add cross referencing to the summary chart as necessary to support locating each feature in the figure or figures.

As some features such as, but not limited to, large concrete pits, USTs, pipe conveyances, sewers, and possibly trenches were not removed during the demolition and may be left in place in the subsurface and the features may contain contamination and/or may be associated with a current and/or future preferential pathway for groundwater and/or vapor intrusion, develop a figure or figures which depict the lateral and vertical location of each feature which remains in the subsurface. Additionally, describe the type and quantity of contaminants which may remain in each feature. Describe contaminants may be associated with a current release from the feature, including units which were "case closed". Describe the potential for any contamination to be exposed and/or released in the future. To the extent information is available, for each subsurface feature, describe the size of the feature, the structural material, the material thickness, the condition/integrity of the structural material with respect to any known or suspected degradation or holes, and how the feature was cleaned, closed, sealed, and/or capped.

Describe and depict the lateral and vertical (mean sea level or "msl") locations where fill including demolition materials (e.g., crushed concrete, soils from chrome plate interior) was placed and the date(s) of placement. For all fill materials, to the extent information is available, describe the type of fill material (for example, soil and/or crushed concrete), the source of the fill material (for example, onsite fill material, onsite demolition and/or offsite documented clean fill/borrow), and any and all information associated with potential impact associated with the fill material.

Depict each sample location to date. For each sample location, describe latitude/longitude (with respect to professionally used geographic reference points – eg. World Geodetic System 1984 datum), vertical location (with respect to mean sea level or MSL), media, all analytes, all detection limits, and all results compared to applicable screening levels, including, if available for metals, any local background levels associated with un-impacted media. Provide data in a searchable EXCL format. Additionally provide all associated documents, including but not limited to, field log books, field sampling reports, boring logs, well construction logs, analyses reports, data validation reports, and tentatively identified compound data (TIC data). For borings, provide a summary of all boring locations, date of boring, depth (MSL), groundwater water levels (MSL), PID results

(MSL), and any other relevant information. For groundwater wells, provide a summary of all wells including the material of construction, diameter, depth (MSL), length of screen, and screen location (MSL). For groundwater, provide a summary of water table levels (MSL).

3. Identification of Facility Related Analytes:

Earlier this year, DII noted that it had submitted to EPA rationale for its selection of analytes and that it was seeking EPA's comments on that rationale. The document entitled "Rationale for Selection of Target Analytes, RCRA Facility Investigation" ("Rationale") was submitted to EPA approximately on July 2, 2010, by ERM on behalf of DII. The document provided a summary of the rationale and context for DII's selected list of analytes that it had been using and was proposing to use at the RCRA Corrective Action Facility. The Rationale was submitted along with a plan for "Supplemental Investigation". EPA transmitted comments to DII on the Rationale and the Workplan in a single document that is dated July 6, 2010. With the exception of now agreeing to apply the TCL list if TICs are identified (rather than the RCRA Corrective Action Appendix IX List), based on EPA's re-review of it July 2010 comments on the Rationale, EPA finds that it continues its comments which were contained in the July 6, 2010 document. EPA's July 2010 comments are provided for reference.

The RCRA corrective action program addresses each and every component and/or compound in a release which may be associated with an unacceptable risk, regardless of when the release occurred. Evaluation of the chemical breadth, magnitude and vertical and lateral extent of contamination should be completed sufficient to comprehensively understand the potential for all unacceptable exposures and determine whether Corrective Action Objectives are fully achieved.

The following analytes or analyte groups have been found to be associated with processes and wastes at the former Facility and, to the extent the analyte may be associated with an unacceptable risk, should be applied to applicable locations in soil and/or groundwater.

Except for *calcium, magnesium, potassium and sodium*, the following analytes should be summarized and included in analyses of relevant investigations of release:

- Each chemical associated with Facility processes, including each chemical detected in analyses associated with operations conducted at the Facility while the Facility was operating;
- Each chemical/analyte detected waste water;
- Each chemical/analyte identified in any air Federal, State, and/or City discharge permits;
- Each chemical/analyte detected in analyses of waste and/or environmentally impacted material that has been transported offsite from the Facility – during operation of the facility and/or following closure of the Facility;
- Each chemical/analyte detected during environmental investigations associated with release at/from the Facility;
- Each tentatively identified compound that may be associated with an unacceptable risk; and
- Each chemical, analyte or analyte group listed below:

pH (groundwater only)
Metals including:

Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Hexavalent Chromium, Cobalt, Copper, Iron, Lithium, Manganese, Lead, Nickel, Silver, Strontium, Thallium, Vanadium, and Zinc

With respect to lithium and strontium refer to
http://www.epa.gov/athens/publications/reports/EPA-600-R03-072-OilComposition.pdf

TCLVOCs and VOC tentatively identified compounds (TICs)

Most investigations to date have included analyses for TCL VOCs.

For background, the Target Compound List ("TCL") list is a list of compounds that along with analyses for tentatively identified compounds (TICs) are applied to investigations conducted at Superfund sites. The list of compounds which are required to be evaluated at land based RCRA hazardous waste treatment, storage and disposal facilities is the list of constituents described in Appendix IX to 40 CFR Part 264. Appendix IX to 40 CFR Part 264 is made up of those compounds on Appendix VIII to Part 261 for which it is feasible to analyze in groundwater plus 17 chemicals routinely monitored for in the Superfund Program. (Refer to 53 Federal Register 25942.) The chemicals which should be investigated at RCRA corrective action facilities are all chemicals associated with release at/from the Facility.

At locations where TCL VOCs have been analyzed for, only detected VOCs should be included in subsequent analyte lists for those locations.

Otherwise, the VOC list which is analyzed for should be the full TCL list of VOCs.

Similarly, at locations where VOC TICs have been analyzed for and where the TICs may be associated with an unacceptable risk, sampling and analyses should be conducted to determine the identity of the TICs (if at all possible) and such previously identified TICs should be included in future monitoring as and where appropriate.

Otherwise, VOC analyses should include TIC analyses.

Information on the management of TICs can be found in Chapter 5 of Part A of the Risk Assessment Guidance for Superfund found at
http://www.epa.gov/oswer/riskassessment/ragsa/index.htm)

It is noted that since subsequent sampling and analyses may be necessary to confirm TIC(s) which may be associated with unacceptable risk and since the Appendix IX list is longer than the TCL list, applying the Appendix IX list from the outset may reduce the need to remobilize to clarify possible TICs. (This information applies to SVOC TICs as well.)

Low level TCL SVOCs and SVOC TICs (including PAHs and alkyl PAHs)

Includes but is not limited to soil and groundwater locations and impacts associated with diesel fuel, oils (refer to http://www.epa.gov/athens/publications/reports/EPA-600-R03-072-OilComposition.pdf), asphalt paint, naphthalene, the area of the former wastewater treatment plant, the former wastewater lagoon, hazardous waste storage locations, dark soils, coal management and/or coal waste/ash.

Concern is cited for achieving sample detection limits below the low screening levels applied to PAHs in drinking water.

Norpar 12: If appropriate, address via VOCs and SVOCs, as described above

Solvasol: If appropriate, address via VOCs and SVOCs, as described above

MTBE:

Applicable to locations and impacts associated with TPH, TPH-GRO, TPH-DRO and Heating Oil

1,4 Dioxane: Applicable to locations and impacts associated with chlorinated solvents

PCBs:

EPA is aware that there has been some investigation of the presence and extent of PCB contamination at a portion of the RCRA Corrective Action Facility and that a remediation for PCB contamination is planned.

EPA does not know whether the investigations which have been conducted for PCBs to date fully addressed the full potential for PCB contamination throughout the RCRA Corrective Action Facility.

Historic industry practices include the use of PCBs in a wide variety of materials and oils-including oils used to suppress dust. The history of use of flammable materials at the Facility and potential history of association with the Navy indicates potential for wide spread use of PCBs in structures which were constructed at the Facility and on land at the Facility.

PCB data should be collected at representative maximum potentially impacted locations throughout the RCRA Corrective Action Facility to assess potential for future unacceptable surface soil runoff to Rivers (via Method 680) and to assess risk associated with potential future unacceptable contact/ingestion/inhalation.

Specific concerns include, but are not limited to, whether building materials which were later crushed on site contain PCBs and whether PCB laden oils may have been used to suppress dust in parking lots.

The following information about PCBs is stated in Clu-in: (http://www.clu-in.org/contaminantfocus/default.focus/sec/Polychlorinated_Biphenyls_(PCBs)/cat/Overview)

PCBs appear as colorless to light yellow oily liquids or waxy solids. These chemicals have no known smell or taste.

PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they do not burn easily and are good insulators. The manufacture of the compounds stopped in the United States in 1977 because evidence showed that they build up in the environment and can cause harmful health effects. Products made before 1977 that might contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, old microscope and hydraulic oils, and in caulking compounds. They also were mixed with paints as a cutting agent and in this form can be found in quantity at some federal facilities.

Dioxin/Furans:

Chlorinated solvents were used at the facility. A coal burner also operated at the facility for over twenty years. Common industry practice over the twenty years when the coal burner was in operation included burning wastes in coal burners. Any ash that is found at the Facility and any soils proximate to any burning/incineration of chlorinated compounds should be sampled and analyzed for dioxin/furans in a limited yet representative data gathering sufficient to apply to a representative risk assessment.

Cyanide:

Cyanide was included in a waste water discharge standard. The Salisbury 1 day limit in 1986 was 1.20 mg/L Cyanide.

Phosphates:

Zinc phosphate was used at the Facility prior 1990. In 1990, Facility converted to iron phosphate. (USACE). If no toxicity criteria is available, address via analyses for metals.

Metal hydroxides:

Waste water treatments included treatments to remove metal hydroxides. If no toxicity criteria is available, address via analyses for metals.

Coolants:

Coolants were stored in a 5000 gallon coolant tank which was located in a machine shop and descriptions of wastes in wastewater, hazardous waste storage, and in the waste oil tank included coolants. As the type of coolants which were used is not described, the coolants should be identified. Note the potential stated above for PCBs to have been used in coolants.

Pesticides: South side of south lot (including storm water basin)

Locations where rails were present:

PCBs, PAHs (including alkyl PAHs), wood treatment chemicals, creosote, CCA

Radiation:

Representatives associated with the Facility and knowledgeable of the history of the facility have stated radiation was not used at the Facility. The following statement is included in the July 2010 Rationale for the Selection of Analytes which was prepared by ERM for DII: "While radiation may be used in engineering testing of materials to identify areas of stress or fatigue in metals that could compromise the strength of the metal when subjected to cyclical loads or stresses, there is no indication that this type of testing was performed for any products manufactured at the facility". Concern is cited as the July 2010 Rationale also expressed that cyanide and PCBs were not used at the facility yet the discharge standards included cyanide and PCBs have since been found at the Facility. Concern also is cited for how the material strength was determined for the truck and bus hoists which were manufactured at the Facility and whether any radiation was used to calibrate meters.

Any final statement by DII about the breadth of chemicals which were used at the facility and/or released must be accompanied by a signed certification (see Section 12, below).

To the extent available, analytical methods which are applied should be EPA approved SW-846 analytical methods which best achieve sample detection limits below applicable screening levels. Regional screening levels are updated approximately each Spring and Fall - refer to http://www.epa.gov/reg3hwmd/risk/human/index.htm. If a screening level does not exist, a screening level should be proposed for EPA approval based conservatively on toxicity data reported in literature and/or health based criteria for similar constituents.

4. Re-evaluation of each location where it was determined that "no further characterization was warranted":

In 2008, DII conducted an evaluation of 23 areas at the site and concluded that "no further characterization [was] warranted" at 14 of the 23 areas. However, most analyses conducted by that time assessed only TCL VOCs, and possibly Priority Pollutant metals.

The fourteen (14) locations cited for "no further characterization warranted" are described on page 42 of the summary chart. The locations included wastewater treatment areas, waste oil USTs, oil USTs, gasoline USTs, diesel USTs, chip drainage pit, other pits, metal pretreatment areas, engineering test areas, servicing areas, a landfarming area, a degreaser/parts washer, and the septic system.

Any analytical data gaps associated with existing data collection at those fourteen locations should be identified.

Concern is cited for whether applicable locations were evaluated for MTBE (locations where gasoline was managed, treated, used and/or released), 1,4 dioxane (locations where chlorinated solvents were managed, treated, used and/or released), low level PAHs (locations where diesel fuel, oils, and/or asphalt paint were managed, treated, used and/or released), all applicable metals (locations where metals, plant waste waters, asphalt paint, oils, and/or diesel fuel were managed, treated, used and/or released), PCBs (locations where PCBs were used, managed and/or released – such as proximate to PCB transformer pads) and dioxin/furans (locations where ash may have been placed- as indicated by boring logs or other information) .

5. Assessment of Impacts to Soil and/or Fill:

A Corrective Action Objective is to protect potential human and ecological receptors from unacceptable exposures associated with releases to soil and/or fill. Unacceptable exposures are identified by considering the results of an approved risk screening and/or an approved quantitative risk assessment and also by considering factors which are not or cannot be quantified through risk assessment such as uncertainty [such as unexplained field results and/or TIC results (unless resampled and quantified)], and potential for unacceptable release to groundwater, air (vapor intrusion) and/or offsite sediment and/or surface water.

A quantitative risk assessment should assess potential exposure risks associated with the maximum impact over the 0-10' bgs interval (construction worker) and maximum impact over the 0-2' bgs interval (all other exposures). However, the assessment of risk associated with release from impacted soil to groundwater and possibly from impacted soil to air (inhalation and/or vapor intrusion) is not limited to these depths.

Describe data gaps associated with identifying maximum impact to soils/fill at all potentially impacted areas throughout the RCRA Corrective Action Facility sufficient to determine whether the Corrective Action Objective is met. Areas throughout the Facility include, but are not limited to, each area identified and/or described in the summary chart.

Please note that given the complexity, and the resources and time required to review Risk Assessments, EPA will only engage in a review of a risk assessment that results from a work plan that EPA was fully involved in developing (i.e. is able to review and comment on). Thus it is strongly recommended that a risk assessment workplan be submitted to EPA prior to completing a risk assessment. The risk assessment workplan should address assessing impacts associated with each release to impacted soils/fill with respect to all reasonably anticipated future land uses. Reasonably anticipated future land use should be determined with respect to the Superfund Land Use Guidance (Land Use in the CERCLA Remedy Selection Process found at http://www.epa.gov/reg3wcmd/ca/va/webpages/vad005007679.html) and in agreement with local government officials. Potential pathways to consider in the risk assessment may include as applicable but are not limited to the following pathways: direct contact exposure associated with potential future use, landscaper exposure, construction worker exposure to 10' bgs, recreational exposure, hypothetical residential exposure (to support use restriction), guide dog exposure (toxicity to dog), inhalation (see Risk Assessment Guidance for Inhalation Risk Assessment found at http://www.epa.gov/oswer/riskassessment/ragsf/), agricultural exposure (human ingestion), farm animal exposure (toxicity to animal and human ingestion), and ecological exposure.

It is requested that any workplan for risk assessment and/or any risk assessment summary/report include the following information. For each location where a risk will be assessed quantitatively, depict: (1) the lateral and vertical extent of impact; (2) location of release source(s); (3) lateral and vertical extent of any fill which was placed and the date; and (4) associated sample locations and depth. For any locations being assessed where fill has been placed, identify (1) any sample locations which may be associated with clean or cleaner fill, (2) any sample locations laterally and vertically immediately beyond the extent of the fill, and (3) sample locations of removed impacted soil being used to approximate remaining impact.

In addition to conducting a risk assessment associated with reasonably anticipated future land use, data should be screened to address the following exposures:

Conduct risk screenings sufficient to support restrictions DII intends to include in the RCRA Corrective Action remedy decision, including but not limited to, a residential use restriction. If a residential restriction will not be included in the decision, then the risk assessment should demonstrate conditions will be acceptable for residential exposure.

Address potential for unacceptable release to groundwater. Conduct a screening associated with protection of groundwater using soil screening levels for protection of groundwater (found in the regional screening tables found at http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/index.htm). For locations which fail the groundwater protection screening, determine whether an associated unacceptable impact is and/or may be present in proximate groundwater. Identify associated (groundwater) data gaps.

Address potential for unacceptable release via storm water runoff. Identify any locations where there exists potential for future unacceptable surface soil runoff to offsite soils and/or offsite sewers, particularly storm sewers which discharge to surface water. Specific concern is cited for potential for unacceptable PCB runoff reaching the Wicomico River. To the extent possible and applicable, assess associated risk, including risk associated with potential for ingestion of PCBs through eating fish (from the lower Wicomico River where a TMDL for PCBs will be established).

Describe uncertainty associated with any risk assessment. Describe each location and associated anecdotal information such as TICs, PID results, and/or other information that indicates potential for unacceptable exposure and/or release which is not fully identified in risk screenings and/or quantified in any risk assessment.

6. Assessment of Impacts to Groundwater:

A RCRA Corrective Action Objective is to restore <u>all</u> RCRA Corrective Action Facility related impacted groundwater to its maximum beneficial use, and while maximum beneficial use is not achieved, to prevent any unacceptable exposure associated with releases to groundwater. The maximum beneficial use of groundwater at the former Wayne Dresser Facility is drinking water. Restoring <u>all</u> Facility related impacted groundwater to maximum beneficial use may be achieved over time.

The following associated information is requested:

1. Describe data gaps associated with determining the magnitude of contamination throughout the lateral and vertical extent of impact to groundwater associated with releases at and/or from the RCRA Corrective Action Facility. It is requested that the vertical and lateral extent of impact be determined to EPA Drinking Water Standards, and, if an EPA Drinking Water Standard does not apply, to EPA Region 3 tap water screening levels. Concern is noted for (a) identifying the maximum concentration of older releases where the top of the groundwater table may have been diluted by precipitation and the maximum contaminant concentration may be located below the top of the groundwater table; (b) identifying the maximum concentration of heavy contaminants such as PCE which accumulate at depth; and (c) identifying any pH in groundwater which is outside of a range that may be unacceptable for a drinking water (secondary <u>recommended</u> goal is 6.5-8.5).

2. Conduct a screening against EPA Drinking Water Standards and current EPA Region 3 tap water screening levels.

3. Determine mobility of each release throughout the vertical and lateral extent of impact.

4. The following information is noted with respect to the potential for offsite groundwater influences and potential future offsite groundwater impact:

While the current direction of groundwater known to EPA is to the north, northwest, historic groundwater direction included a component to the south. The former operation of a well at the former Shoreland Freezer which was located 500 feet to the south and drew 6 gal/min may have formerly influenced the direction of groundwater. Thus there may be a component of impacted groundwater which flowed to the south.

Much of the following information was gathered several years ago from the Salisbury Website and/or from submitted reports.

The current Salisbury web site includes the following web page addressing water quality:
http://www.ci.salisbury.md.us/?page_id=2188

Reports of Water Quality are published annually.
Water Quality Reports from 2006 to 2012 currently are published on the web site.

The 2012 Report states that the city "uses 11 wells from two Water Plants to obtain our drinking water" and that "The two northernmost wells draw water from the deeper and highly productive paleochannel sediments within the Quatenary System."

Salisbury Municipal Water Supply 1.5 Miles north of Facility-
(from information published on Public Works Website several years ago)
Field of 11 wells from 51 to 150 ft deep along Beaverdam Creek
Yield 1000 gal/min-

Salisbury Municipal Water Supply Southeast –
(from information published on Public Works Website several years ago)
Wicomico Shore – supplies 1200 people
Salisbury Airport – supplies 30 people
Wicomico Day school – supplies 300 people
E. Wicomico Little League – supplies 300 people

Offsite Industrial/Commercial/Institutional groundwater users may include the hospital

Private groundwater users –
Approximately 3000 domestic wells are located within a 3 mile radius-
Well depths range from 20 to 200 feet
Yield ranges from 2 to 25 gal/min

7. Locations Potentially Associated with Future Unacceptable Vapor Intrusion

A RCRA Corrective Action Objective is to prevent unacceptable vapor intrusion. Identify RCRA Corrective Action Facility locations potentially associated with unacceptable vapor intrusion associated with impacts to the saturated and unsaturated zones. Such locations may not be addressed through the context of a risk assessment and/or any remediation. Concerns include but are not limited to the potential for unacceptable vapor intrusion via current and/or future subsurface features such as conduits, elevator shafts, and/or basements. The vapor intrusion screening level calculator may be applied to assess potential for unacceptable vapor intrusion

associated with impacts to groundwater (refer to http://www.epa.gov/oswer/vaporintrusion/guidance.html). A common sense approach is suggested with respect to determining the potential for unacceptable vapor intrusion associated with VOC impacts to the unsaturated zone. See also page 60 of the June 2014 Summary Chart.

8. Potential for Offsite Impact:

A RCRA Corrective Action Objective is to address any unacceptable offsite impact. Determine data gaps associated with determining the potential for current and/or future offsite unacceptable impact which may be associated with a release at and/or from the RCRA Corrective Action Facility, including but not limited to, potential for current and/or future impact to offsite surface soils, subsurface soils, groundwater, sediment, surface water, and/or indoor air - including through preferential pathways such as sewers and conduits. See also pages 60-61 of the June 2014 Summary Chart.

9. Data Gap Summary:

Summarize and address all data gaps sufficient to demonstrate that the investigation/characterization will support remedy decisions that meet the Corrective Action Objectives. Specific concern is cited for potential for any offsite release of MTBE, PCE and/or 1,4 Dioxane to the groundwater column, any release of metals and PAHs to groundwater, any release of metals, PAHs and/or dioxin/furans to onsite soils, and any release of VOCs and PCBs to the storm sewers. Releases to groundwater should be sufficiently characterized to determine contaminant extent in relation to the Corrective Action Objective throughout impacted groundwater. Releases to soils should be determined sufficient to assess risk and determine exposure controls in relation to Corrective Action Objectives. Releases to offsite sewers should be determined sufficient to assess potential for unacceptable offsite impact- vapors to structures and PCBs to sediment and/or surface water in relation to Corrective Action Objectives.

10. Justifications for Locations Associated with "No Further Action"

For locations, media, exposure routes and Corrective Action Objectives associated with "No Further Action", provide explicit rationale/justification. For example, where applicable for former locations, document where there is no evidence of release based on operational history and/or visual observation and/or field sampling and analyses results. Specify associated dates of inspection and analyses results and provide associated documentation, including sampling locations and analyses reports, etc.

11. Update Environmental Indicators:

Update the existing environmental indicators for current human exposures under control and contaminant migration in groundwater migration under control (including the groundwater model) throughout the process to ensure achievement of the environmental indicators is maintained. Promptly identify and mitigate any current unacceptable exposures. Identify data gaps with respect to current and future land use.

12. Certification Requirements:

All data and information that will be used in the draft RCRA Corrective Action Decision should be certified by a Responsible Corporate Officer consistent with the requirements for certification of submittals to the EPA Region 3 RCRA Corrective Action Facility Lead Program (refer to "Section IV. Certification" of the "Facility Lead Agreement" at http://www.epa.gov/reg3wcmd/ca/ca_facilitylead.htm).

Attachments to Work Request:

1. June 2014 Summary Combined Chart
2. July 2010 Comments on Analyte Rationale