

ENCLOSURE NO. 2

**Agencies' Final
FMC Corrective Action Objectives**

AGENCIES' FINAL CORRECTIVE ACTION OBJECTIVES

FMC Corporation, Middleport, New York Facility

Applicable to the off-Site study areas pertaining to soil and sediment
(i.e., excluding the FMC plant site and the FMC-owned N. RR Property)

March 26, 2009

1. To protect human health and the environment relative to FMC-related contamination, in accordance with, and/or in consideration of, applicable, or relevant and appropriate laws, rules and guidance, using site-specific data and information, supported by multiple lines of evidence, including site-specific risk assessment, and based on current and reasonably anticipated future land use(s). Reasonably anticipated future land uses will be identified in consultation with the community.
 - A. Achieve unrestricted use (i.e., without the need for institutional or engineering controls) of current and reasonably anticipated future residential properties within these study areas.
 - B. Reduce and manage potential human health risks associated with FMC-related contaminants in soil and sediment, keeping in mind that risk is a function of contaminant concentration and routes, likelihood of exposure, and other factors, such that:
 - Excess human health carcinogenic risks are reduced such that the lifetime excess cancer risks fall within the range appropriate for residential communities (i.e., 10^{-4} to 10^{-6});
 - Human health non-carcinogenic risks are reduced such that non-cancer risks do not exceed the level appropriate for residential communities (i.e., Hazard Index ≤ 1.0); and
 - The "point of departure", or starting point for corrective action risk-management decisions pertaining to arsenic in soil, is the site-specific residential background considering site-specific histories of use for current and reasonably anticipated future residential properties within these study areas.
 - C. With agreement by the property owner, and based on current and reasonably anticipated future non-residential use of a property, a combination of institutional and/or engineering control methods may be acceptable as corrective measures as long as they are determined to render adequate, long-term protection of human health and the environment.
 - D. Eliminate, reduce or control existing or potential adverse ecological impacts due to elevated concentrations of FMC-related contaminants in soil and/or sediments, while balancing adverse ecological impacts that may result from the remediation activities themselves.

- E. Eliminate, reduce or control the potential for migration of FMC-related contaminants in soil and/or sediment, while balancing adverse ecological impacts that may result from any such measures themselves.
2. Minimize disturbance and disruption of the community so that the character of the neighborhoods can be maintained.
 3. Inform and engage affected property owners and local residents in meaningful participation throughout the cleanup process, including the CMS, and corrective measures, design and implementation phases.
 4. Consistent with the above objective, use best management practices of USEPA's Green Remediation concepts (i.e., clean diesel technology, waste minimization, resource conservation, reduction of greenhouse gas and other air emissions (e.g., by using alternative energy sources and/or fuel-efficient technology, minimizing truck trips, etc.), ecological and soil preservation) to reduce the demands placed on the environment ("footprint"). In keeping with the Green Remediation strategies site cleanup and reuse can mutually support one another by leveraging infrastructure needs, sharing data, minimizing demolition and earth-moving activities, re-using structures and demolition material, and combining other activities that support timely and cost-effective cleanup and reuse. Early consideration of green remediation opportunities offers the greatest flexibility and likelihood for related practices to be incorporated throughout a project life.