DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name:	Wood Industries
Facility Address:	11373 Southton Rd, San Antonio, TX 78223
Facility EPA ID #:	TXDO27070655

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

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

____ If no - re-evaluate existing data, or

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

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

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

Definition of "Current Human Exposures Under Control" EI

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

Relationship of EI to Final Remedies

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

Duration / Applicability of EI Determinations

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

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

	Yes	No	?	Rationale / Key Contaminants
Groundwater		N		
Air (indoors)[2]		N		
Surface Soil (e.g., <2 ft)	Y			One soil sample exceeded screening levels for lead: sample collected east-southeast of one of the battery cases waste piles
Surface Water		N		
Sediment		N		
Subsurf. Soil (e.g., >2 ft)		N		
Air (outdoors)		N		

____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

X If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

Recent activities:

Weston Solutions Inc Superfund Technical Assessment and Response Team, was tasked by the U.S. Environmental Protection Agency (EPA) Region 6 Response and Prevention Branch to perform soil, surface water and residential well sampling at various locations surrounding Wood

[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.

Industries located at 11373 Southton Road in San Antonio, Bexar County, Texas. The property drains into an unnamed tributary, which flows into Segment 1911 of the San Antonio River Basin. The site is a primary collection site for recyclable glass, paper, plastic, and metal that are generated off site and consists of approximately 40 acres of land. The site contains small slag waste piles and two lead battery case piles. The site is bordered by residential, industrial, and open vegetated land. The San Antonio River is west of the site and an industrial area is located approximately 1/4 mile south of the site, across Center Road.

A total of ten soil samples from areas adjacent to the battery case piles and two slag piles; two groundwater samples from two residential wells; and one surface water sample from an on-site pond; were collected August 20-27, 2004 for analytical testing. Soil samples were analyzed for target analyte list (TAL) metals, mercury, and pesticides. Surface water and groundwater samples were analyzed for TAL metals, mercury, pesticides, total complete list (TCL) volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). Based on the analytical data received, only one sample contained a level of constituent of concern that exceeded the EPA Region 6 Human Health Medium-Specific Screening Levels for Industrial Outdoor Workers for lead at 2,040 mg/kg.

The location of the wells identified for groundwater sampling was determined by a groundwater well survey completed in June 2004 by Atlas E.R. Water Well Search. The survey identified 16 groundwater wells within a one mile radius of the facility. The well owners could not be contacted, as the information in the survey was out of date and new well owners could not be confirmed. A house to house well survey was conducted and determined that all but one of the residences and the business surrounding the site had plugged the groundwater wells that were located on their property. The one active adjacent off-site well is owned by Mr and Mrs Kevin Taylor and is located approximately 50 yards north of the site boundary. They allowed access to sample their well.

Two groundwater samples were collected. One sample was collected off-site from a private well (Taylor Residence) located northwest of the site on an adjacent residence; the second sample was collected on-site from a private well with the spigot located adjacent to the current work shop. Both analytical results indicated that the samples collected did not contain COC levels above the EPA Region 6 Human Health Screening Levels. See attached analytical results.

Reference : Removal Assessment Report For Wood Industries, October 2004

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

Summary Exposure Pathway Evaluation Table

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

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater	N	N	N	N	N	N	N
~~Air (indoors)~~	___	___	___				
Soil (surface, e.g., <2 ft)	N	Y	N	N	N	N	N
Surface Water	N	N	N	N	N	N	N
Sediment	N	N	N	N	N	N	N
Soil (subsurface e.g., >2 ft)	N	N	N	N	N	N	N
~~Air (outdoors)~~	___	___	___	___	___		

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

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

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

_X_ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):
Groundwater: Exposure pathways for residents, daycare facilities , recreation or food pathways are incomplete because there is no evidence that water has been impacted.

Exposure pathways considered completed for onsite worker to impact surface soils. Exposures for the complete pathways described are considered to be insignificant because the one worker employed at this facility primarily

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

works in a location that is a considerable distance from the impacted soil. The impacted area is located on an isolated area of the site separate from the recycling plant where the workers are working. Potential for long term exposure is limited.

Reference:
Screening Site Inspection of Wood Industries, Ju.ly 31, 1990;
Removal Assessment Report for Wood Industries, Oct 2004, prepared by Weston Solutions.
Both reports specified a No Further Remedial Action Required status for Wood Industries.

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)?

X 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 not expected to be "significant."

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

Rationale and Reference(s):

Exposures for the complete pathways described are considered to be insignificant because the one worker employed at this facility primarily works in a location that is a considerable distance from the impacted soil. The impacted area is located on an isolated area of the site separate from the recycling plant where the workers are working. Potential for long term exposure is limited.

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[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.

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

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):

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

X YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Wood Industries facility, EPA ID # TXD027070655, located at 11373 Southton Rd, San Antonio, TX 78223 under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

____ NO - "Current Human Exposures" are NOT "Under Control."

____ IN - More information is needed to make a determination.

Completed by (signature) _____ Date _____
(print) Debra Tellez
(title) Environmental Engineer

Supervisor (signature) _____ Date _____
(print) Laurie King
(title) Chief, Federal Facilities Section
(EPA Region or State) EPA Region 6

Locations where References may be found:
U.S. EPA Region 6, 1445 Ross Ave, Dallas, TX 79202

Contact telephone and e-mail numbers

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FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

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Completed by	(signature) Debra Tellez		Date 4-11-05
	(print)	Debra Tellez	
	(title)	Environmental Engineer	
Supervisor	(signature)		Date 4-18-05
	(print)	Laurie King	
	(title)	Chief, Federal Facilities Section	
	(EPA Region or State)	EPA Region 6	

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