



MISSOURI DEPARTMENT OF  
**HEALTH**

P.O. Box 570, Jefferson City, MO 65102 • 314-751-6400 • FAX 314-751-6010

February 20, 1992

John Ashcroft  
Governor

John R. Bagby, Ph.D.

Director	
Site:	Bluff Electric
ID#:	MOD 985767-821
Break:	2.4
Other:	Comments
	2-20-92

FEB 24 1992

SPFD BRANC

Mr. Robert L. Morby  
Chief, Superfund Branch  
Waste Management Division  
U. S. Environmental Protection Agency  
726 Minnesota Ave.  
Kansas City, KS 66101

Dear Mr. Morby:

Enclosed please find the final Risk Assessment for the Bluff Electric Works Site in Butler County, MO. Several changes have been made in the risk assessment in response to comments received from the Environmental Protection Agency (EPA). Following is a summary of EPA's comments and the Department of Health's responses.

1. Section 2.1 states that 2-butanone was ruled out as a contaminant of concern. If either IRIS or HEAST has a RfD or a slope factor, please calculate its associated risk and include in the overall site risk. Also note that 2-butanone is commonly known as methyl ethyl ketone or MEK.
  - 2-Butanone has been included in the risk assessment as a contaminant of concern. Changes in text related to this inclusion will be found in section 2.1, figure 4, section 2.2, section 2.3, section 3.1, section 5.1.1, section 5.1.3, section 5.3 and section 6.0.
2. Section 2.1 rules out furans as a contaminant of concern due to the difficulty in assessing exposure to contaminants in concrete walls. As additional justification for not calculating its risk, please expand this paragraph to include that the concrete will be demolished and disposed of as part of the removal action.
  - This information has been included.
3. Figure 4 title should specify that the concentrations are Upper 95% Confidence Levels.
  - The figure title has been modified accordingly.
4. Section 5.1.1 discusses the effects of dermal contact with copper. Please define the term "pruritis."
  - The term "pruritis" has been replaced with "itching" in sections 5.1.1 and 5.1.3.

SUPERFUND RECORDS



40184418



Recycled Paper

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER — Services provided on a nondiscriminatory basis

5. Section 5.1.1 discusses the blood lead levels predicted by the Biokinetic Uptake Model. Please indicate that EPA generally considers blood lead levels above 10 ug/dL to represent excessive risk and warrant a response action.

- It has been indicated in both sections 5.1.1 and 5.1.3 that EPA generally considers blood lead levels above 10 ug/dL to represent excessive risk.

6. Section 5.2 states that an excessive cancer risk may exist when the total cancer risk exceeds the  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$  range. This statement should be deleted or altered because region 7 has not yet adopted this as its policy. It would be more appropriate to state that EPA generally considers a cumulative carcinogenic risk for an RME of greater than  $1 \times 10^{-4}$  (or one in ten thousand) to be unacceptable and to require a cleanup.

- Wording has been altered throughout sections 5.2 and 6.0 to incorporate this comment.

7. Please delete the second sentence in section 5.2.2.

- The sentence has been deleted.

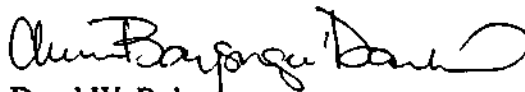
8. In Table 8, the heading "Intake/SF Adjusted for Absorption" is followed by a question mark. Is this a typographical error?

- The question mark has been removed.

The incorporation of these comments has not altered the original conclusions of the risk assessment, namely that carcinogenic risk exceeds the acceptable level.

We appreciate the opportunity to work with you on this site. If you have any questions regarding this assessment, please feel free to call Ms. Cherri Baysinger-Daniel at (314) 751-6102.

Sincerely,

  
for Daryl W. Roberts  
Chief  
Bureau of Environmental Epidemiology

DWR:CBD:pw

Enclosure

cc: Mary Peterson, U. S. Environmental Protection Agency  
David Crawford, U. S. Environmental Protection Agency

**Risk Assessment for  
Bluff Electric Works Site, Butler County, Mo**

Prepared by:  
Cherri Baysinger-Daniel  
Missouri Department of Health  
Bureau of Environmental Epidemiology  
1730 East Elm, P.O. Box 570  
Jefferson City, MO 65102

## **1.0 INTRODUCTION**

### **1.1 OBJECTIVE**

Missouri Department of Health (DOH) was tasked by the U. S. Environmental Protection Agency to conduct a risk assessment for the Bluff Electric Works site in Poplar Bluff, MO. Bluff Electric Works was an electric transformer repair and distribution facility located in Poplar Bluff, MO. Soils at the site are contaminated with polychlorinated biphenyls (PCBs). The purpose of the risk assessment was to determine if contaminants at the site posed health risks severe enough to warrant a cleanup.

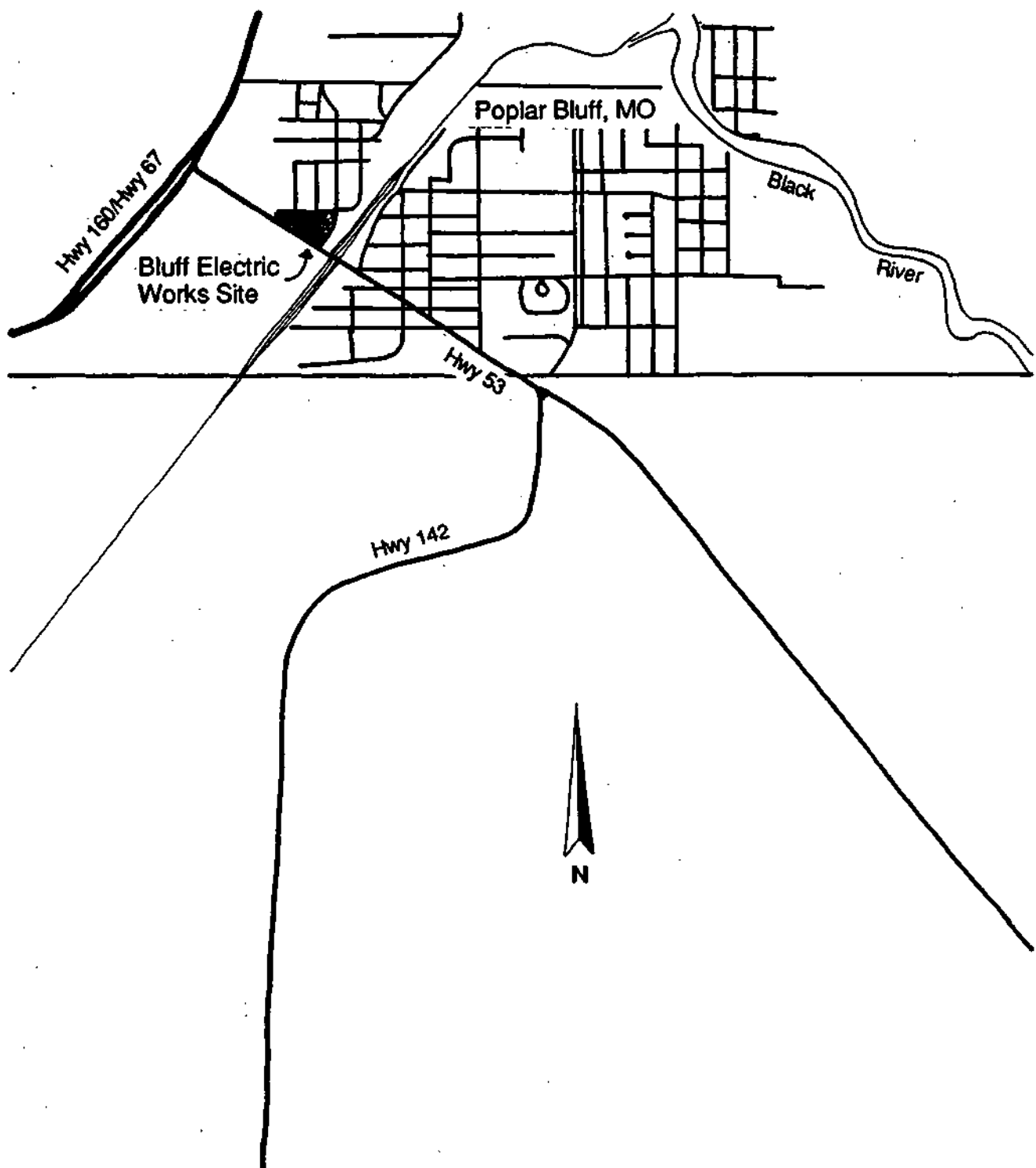
### **1.2 SITE BACKGROUND**

Bluff Electric Works site is located on the northwest corner of the intersection of Highway 53 and South 11<sup>th</sup> Street in Poplar Bluff, MO (Figure 1). The site, approximately 3 acres in size, is zoned industrial and is surrounded by residential property. There are two buildings on site. One served as the office and service areas for Bluff Electric Works and the other is a vacant house. A 300-400 gallon underground storage tank is located under the west service room and two 750-1000 gallon above ground storage tanks are located outside the building on a concrete pad. The concrete pad was used for temporary storage of transformers waiting to be serviced or picked up. Southeast of the office/service area is an asphalt parking lot (Figure 2).

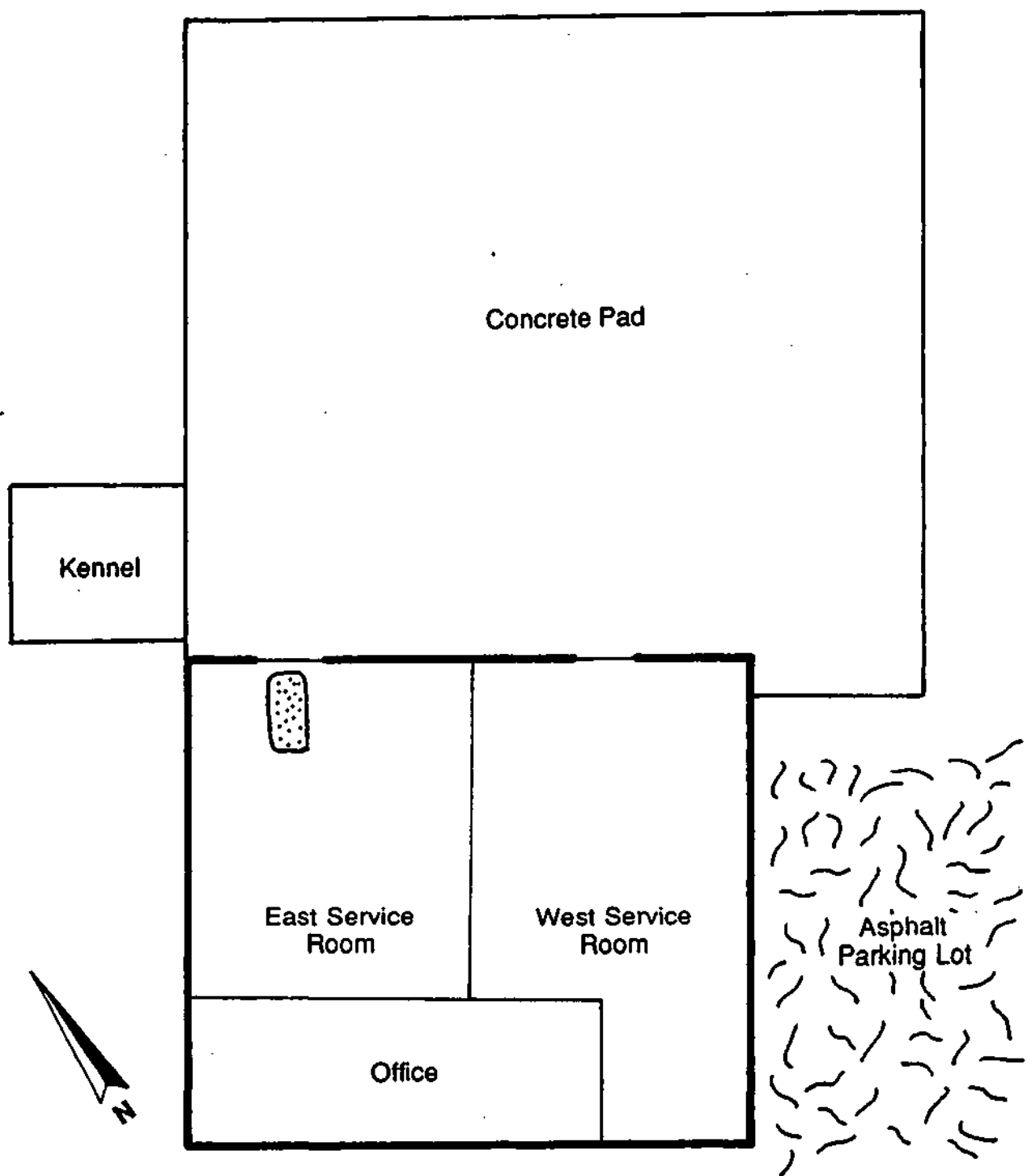
Bluff Electric Works sold and serviced new and used transformers and electric motors on site between 1953 and 1987. Typically, when a transformer came in for service the oil was drained then the core and electrical wires were stripped. The transformer was placed in a 4' x 6' double boiler to melt wires and coatings. Used transformer oil fueled the fire under the double boiler. In the 1960s or 1970s, the double boiler was replaced with a natural gas fired furnace. If a transformer was not serviceable, it was stored along the South 12<sup>th</sup> Street right-of-way on gravel or native soil. Electric motors were reconditioned by replacing copper wires and bushings. Paint was stripped from motor housings using an acid bath and units were degreased with gasoline. Ceramic paint was dried in a baking oven located in the west service room.

### **1.3 PREVIOUS INVESTIGATIONS**

Several investigations have been carried out on the Bluff Electric Works site since the Butler County Health Department filed an incident report on December 30, 1986. An initial investigation was conducted by EPA in January, 1987. Three soil samples were taken and analyzed for PCBs. PCB concentrations found in these samples ranged from 47 to 185 mg/kg. Based on these results, the EPA issued a Notice of Violation to Bluff Electric Works on May 5, 1987. Bluff Electric Works contracted with National Electric, Inc. to remove contaminated soils and other materials from the Bluff Electric Works property. National Electric began the removal action in June, 1987 but halted two days later when soil sampling indicated that PCB contamination was more widespread than originally thought (The Earth Technology Corporation 1991).



**Figure 1**  
**Location of the Bluff Electric Works Site**  
**Bluff Electric Works Site**  
**Butler County, MO**



**Figure 2**  
**Diagram of Bluff Electric Works Building**  
**Bluff Electric Works Site**  
**Butler County, MO**

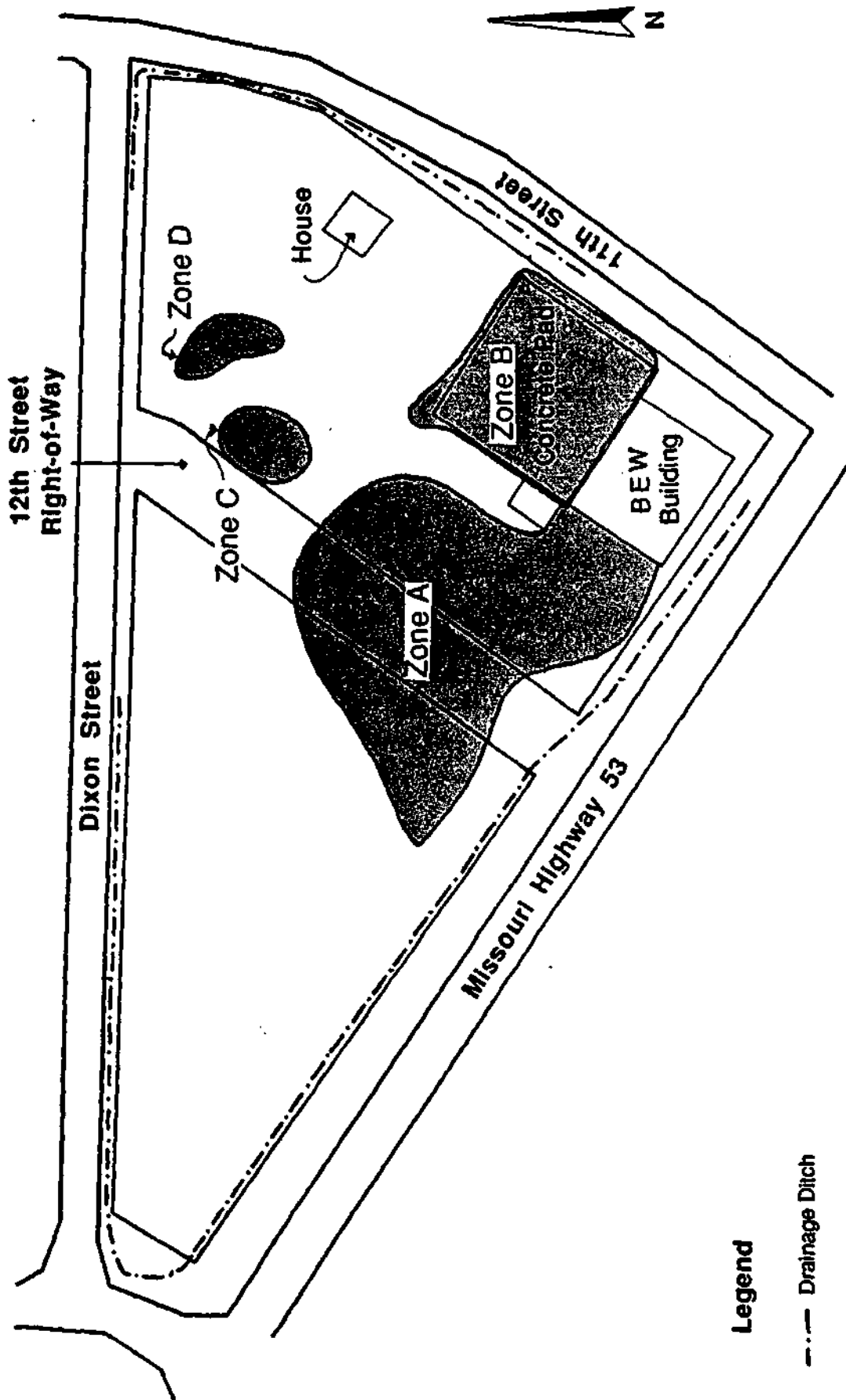
A preliminary site assessment was conducted by EPA's Technical Assistance Team (TAT) in April, 1989. A total of 69 samples were taken from surface soil, shallow soil borings, concrete and asphalt. Five wipe samples were taken from the two on site buildings. Twenty-five of the samples were sent to an EPA Contract Laboratory Program (CLP) for confirmation of PCB concentrations and analysis of target compound list (TCL) metals and volatile organic analytes (VOA). Results of this investigation indicated that 2-butanone was the only VOA present above detection limits, concentrations of copper and lead in soil were elevated, and measurable concentrations of PCBs were present throughout the site (E & E 1989, Appendix I).

EPA's TAT conducted a geophysical survey in June 1989 to determine if transformers were buried on the Bluff Electric Works site. Four anomalies were located, but no evidence of large amounts of buried iron material was found on site (The Earth Technology Corporation 1991). In September, 1990, EPA's TAT conducted a site perimeter survey to determine if PCB contamination was migrating offsite. Samples from two sides (along the west boundary of the 12<sup>th</sup> Street right-of-way and the south boundary parallel to Highway 53) had PCB concentrations above 450 mg/kg in surface samples, indicating that PCB contamination was not restricted to the Bluff Electric Works site (EPA 1990a, Appendix II).

#### 1.4 Site Characterization Study

The site characterization study for Bluff Electric Works was completed in September 1991 by the Earth Technology Corporation. Goals of the site characterization were to evaluate horizontal and vertical extent of PCB contamination at Bluff Electric Works and adjacent properties and to determine if PCB combustion products (primarily dioxins and furans) were present at the site. To accomplish these goals, 196 samples were taken from surface and subsurface soils, drainage ditch sediments and subsurface soils under the office/service building, concrete pad and parking area and analyzed for PCB concentrations. Two concrete samples were taken from a visibly stained area in the former furnace area for dioxins and furans.

Results from these samples indicate that PCB contamination is present throughout the Bluff Electric Works site and adjacent properties (Appendix III). Four areas within the site have PCB concentrations consistently above 10 mg/kg (Figure 3). Mean PCB concentrations for each of the four areas and the mean concentration for the remainder of the site are indicated in Table 1. Levels of dioxins measured in concrete samples did not exceed levels indicating a health concern (The Earth Technology Corporation 1991, Appendix III).



**Figure 3**  
**Location of Zones with PCB Concentrations**  
**Greater than 10 mg/kg**  
**Bluff Electric Works Site**  
**Butler County, MO**



**Table 1.**

**Bluff Electric Works, Poplar Bluff, MO**

**Mean, Range and Upper Confidence Limits for PCBs in the Four Contaminated Zones**

<b>Zone</b>	<b>Mean and Range of PCB Concentrations (mg/kg)</b>	<b>Standard Deviation</b>	<b>Maximum Concentration (mg.kg)</b>	<b>95% Upper Confidence Limit (mg/kg)</b>
A	485 <0.1 -7,900	1,406	7,900	815
B	63 14-230	69	230	96
C	69 16-120	52	120	65
D	29 11-59	26	59	54
Other locations on site	1.3 <0.1-17	2.5	17	1.8

## **2.0 IDENTIFICATION OF CONTAMINANTS OF POTENTIAL CONCERN**

### **2.1 CONTAMINANTS OF CONCERN**

Based on results from the preliminary site assessment and the site characterization, the list of contaminants of potential concern can be reduced to furans, 2-butanone, copper, lead, and PCBs. Results from the preliminary site assessment will be used for 2-butanone, copper and lead. Results from the site characterization will be used for furans and PCB's.

Furans were present in detectable levels in one concrete sample (Appendix III). Concrete present at the Bluff Electric Works site is scheduled to be demolished and disposed of as a part of the site remediation. Because the concrete will be removed from the site and difficulty in assessing exposure to compounds in concrete walls, furans were eliminated from the risk assessment.

In all soil samples where 2-butanone was detected, the compound identification was certain, but the concentrations were estimated (J-qualified, Appendix I). Concentrations found ranged from 6(J) - 1,700(J) mg/kg. The highest concentration found (1,700(J) mg/kg) was in a concrete dust sample from the pad north of the building. Concentrations of 2-butanone in soil ranged from 6(J) - 400(U) mg/kg. For soil samples where 2-butanone was undetected (U qualified), one half of the detection limit was used in calculations.

Copper concentrations found at the site ranged from 12 - 20,000 mg/kg. The highest concentrations found (11,000 and 20,000 mg/kg) were in dust samples from inside of the office/service building. Concentrations found in surface soil ranged from 23 - 2,900 mg/kg, with an overall site mean concentration of 675 mg/kg (Appendix I).

Lead concentrations found at the site ranged from 7.4 to 16,000 mg/kg. Two of the three highest concentrations (4,200 and 16,000 mg/kg) were again found in dust samples from inside of the office/service building. Lead concentrations in surface soil ranged from 18 to 5,100 mg/kg, with an overall site mean concentration of 463 mg/kg (Appendix I).

PCB concentrations found at the site ranged from below detection limits to 7,900 mg/kg (Appendix III). Mean PCB concentrations for each zone are shown in Table 1.

### **2.2 CONTAMINATED ZONES**

Four zones were identified where surface soil PCB concentrations were greater than 10 mg/kg. Contaminated zone A was the largest of the four zones. Zone A occupied an area which began at the Bluff Electric Works building and extended approximately 220 feet west. At the widest point, zone A measured approximately 150 feet. Much of the southwest portion of the Bluff Electric Works property, much of the 12<sup>th</sup> Street right-of-way and a portion of the property on the other side of 12<sup>th</sup> Street was included in zone A. The highest PCB concentrations were found in zone A (Figure 4). High levels of lead and copper were also found in this zone. Upper 95% confidence limits of the mean

concentrations of PCBs, 2-butanone, lead and copper found in zone A are shown in Figure 4.

Contaminated zone B occupied the area under and around the concrete pad behind the Bluff Electric Works building. Much of zone B was covered by the concrete pad. PCB, lead and copper concentrations were lower in zone B than in zone A. Upper 95% confidence limits of the mean concentrations of PCBs, 2-butanone, lead and copper found in zone B are shown in Figure 4. Contaminated zones C and D are located in the northern half of the Bluff Electric Works site by the 12<sup>th</sup> Street right-of-way and Dixon Street, respectively. These zones are smaller and have lower PCB, lead and copper concentrations than zones A and B. Upper 95% confidence limits of the mean contaminant concentrations are shown in Figure 4.

PCB concentrations in the site outside of the four contaminated area ranged from below detection limits to 17 mg/kg. The upper 95% confidence limit on the mean concentration was 1.8 mg/kg (Table 1).

Zone A was chosen for use in the risk assessment. It covered a large portion of the Bluff Electric Works site and the four contaminants of concern were present.

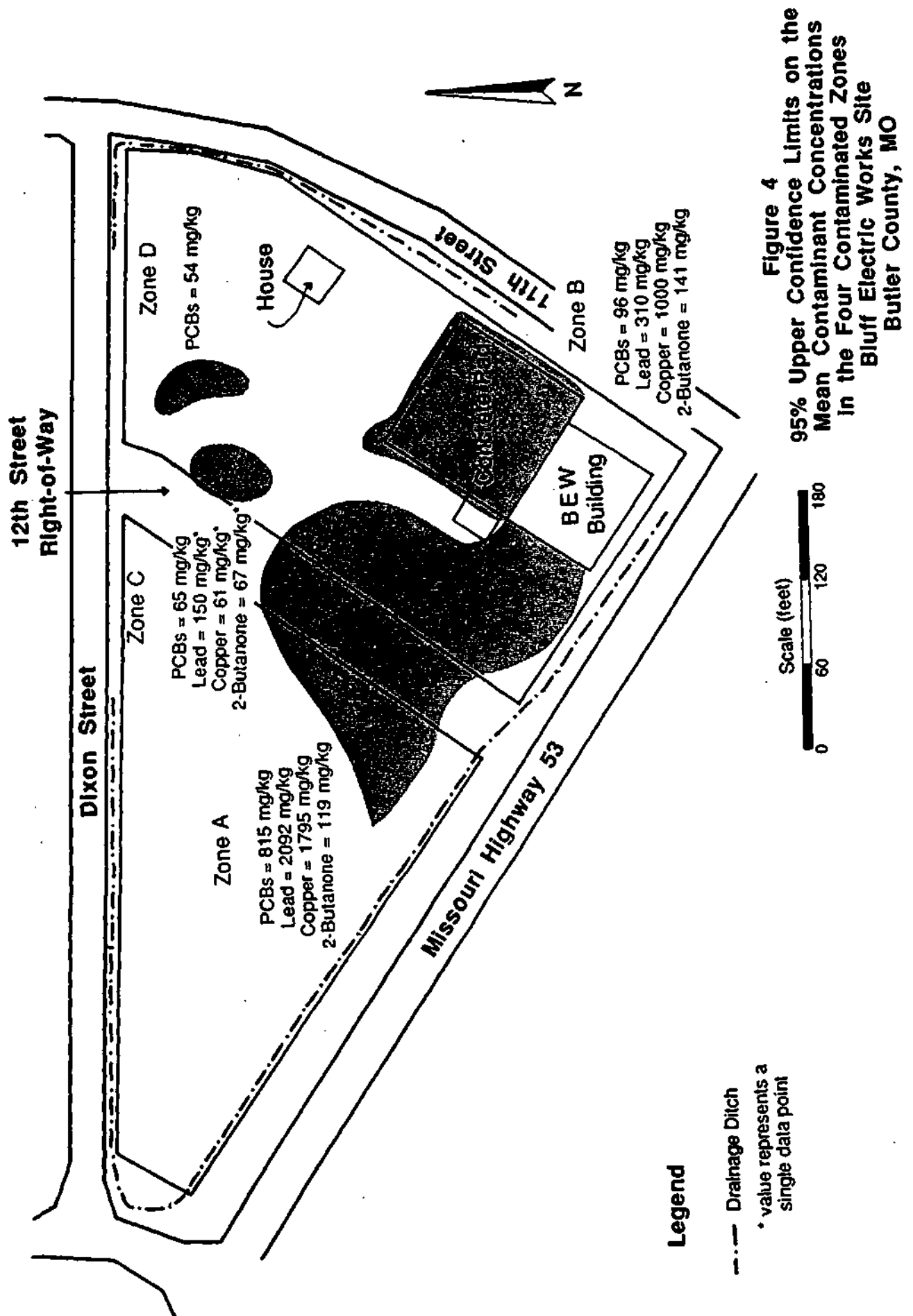
## 2.3 PCB CONCENTRATIONS IN AIR

Because air monitoring was not done at the site, PCB concentrations for fugitive dust inhalation calculations were not available. PCB concentrations in fugitive dust particles were calculated using the formula:

$$\text{Concentration in Air (mg/m}^3\text{)} = (\text{Concentration in Soil-mg/kg})(\% \text{ Respirable Particles}) / (\text{Total Suspended Particles-ug/m}^3)(\text{Conversion Factor-kg/ug}).$$

This formula was modified from Exposure Factors Handbook, Part 2, section 1-10 (EPA 1990b). A mean PCB concentration for the Bluff Electric Works site, 227 mg/kg, was used for the Concentration in Soil values. The Total Suspended Particles value in the formula was determined from historical particulate monitoring data from Cape Girardeau (84 ug/m<sup>3</sup>, C. Hickman, Missouri Department of Natural Resources, pers. comm.). Cape Girardeau was Missouri Department of Natural Resources closest monitoring station to Poplar Bluff. Respirable fraction of particles was not provided and was assumed to be 100%. Thus, a concentration  $1.9 \times 10^{-5}$  mg PCB/m<sup>3</sup> air was used for inhalation pathway intake calculations.

2-Butanone is a volatile compound, thus it would be inappropriate to use concentrations of 2-butanone on dust particles to estimate exposure. A more appropriate estimate of exposure would be a calculation of the concentration which has volatilized from contaminated soil. However, because 2-butanone concentrations are generally low at the Bluff Electric Works site (mean concentration=92 mg/kg), EPA personnel determined inhalation of volatilized 2-butanone would not contribute significantly to the risk at the site and that this pathway could be eliminated from the risk assessment.



### **3.0 EXPOSURE ASSESSMENT**

#### **3.1 LAND USE SCENARIOS**

Both current and future land use scenarios were considered in this risk assessment. For the current land use scenario, the site remains abandoned and is surrounded by residential property. Access to the site is unrestricted. Based on residential property currently surrounding the site, a residence is located on the site for the future land use scenario.

#### **3.2 REASONABLE MAXIMUM EXPOSURES (RME)**

##### **3.2.1 RMEs FOR CURRENT LAND USE SCENARIO**

For the current land use scenario, two RMEs were developed by EPA using site specific assumptions. RME 1 was a child, aged 5-12, visiting the site once a week for 40 weeks over a 7 year period. The child wore a t-shirt, long pants, socks and shoes while visiting the site. The child played in contaminated soil, incidentally ingested soil, and inhaled airborne contaminated dust while on the site.

The second RME for the current land use scenario was an adult who lived across the street from Bluff Electric Works for 30 years. The adult inhaled fugitive dust 24 hrs/day from the site while living adjacent to the site.

##### **3.2.2 RMEs FOR FUTURE LAND USE SCENARIO**

Based on the surrounding property, future land use for the Bluff Electric Works site was assumed to be residential. A residence will be located on the site (in zone A) and a person will live in the residence for 30 years. The person will inhale airborne contaminated dust, have dermal contact with contaminated soil and incidentally ingest contaminated soil.

##### **3.2.2 INTAKE CALCULATIONS**

Chemical intakes for all RMEs were calculated using pathway specific formulas in Tables 2-7. Exposure variables were chosen by EPA personnel so that the combination of all intake variables resulted in a reasonable maximum intake for each chemical within each pathway.

**Table 2.**

**Bluff Electric Works, Poplar Bluff, MO**

**Formula for  
Adult-Inhalation of chemicals in fugitive dust\***

**Equation:**

$$\text{Intake (mg/kg/day)} = \text{CA} \times \text{IR} \times \text{ET} \times \text{EF} \times \text{ED} / (\text{BW} \times \text{AT})$$

**Where:**

**CA=Chemical Concentration in air (mg/m<sup>3</sup>)**

**IR=Inhalation Rate (m<sup>3</sup>/hr)**

**ET=Exposure Time (hours/day)**

**EF=Exposure Frequency (days/year)**

**ED=Exposure Duration (years)**

**BW=Body Weight (kg)**

**AT=Averaging Time (days)**

**Variable values:**

**CA=Calculated value (section 2.3)**

**IR=0.83 m<sup>3</sup>/hour (EPA 1990)**

**ET=24 hour/day (number of hours in a day)**

**EF= 365 days/year (number of days in a year)**

**ED=30 years (EPA 1991c)**

**BW=70 kg (EPA 1990b)**

**AT= 10950 days for noncarcinogenic effects (ED x 365 days/year)**

**25550 days for carcinogenic effects (70 years x 365 days/year)**

**\*Formula was obtained from EPA 1989**

**Table 3.**

**Bluff Electric Works, Poplar Bluff, MO**  
**Formula for**  
**Adult-Incidental ingestion of chemicals in soil\***

**Equation:**

$$\text{Intake (mg/kg/day)} = \text{CS} \times \text{IR} \times \text{CF} \times \text{FI} \times \text{EF} \times \text{ED} / (\text{BW} \times \text{AT})$$

**Where:**

CS=Chemical Concentration in soil (mg/kg)  
IR=Ingestion Rate (mg soil/day)  
CF=Conversion Factor (kg/mg)  
FI=Fraction Ingested from contaminated source (no units)  
EF=Exposure Frequency (days/year)  
ED=Exposure Duration (years)  
BW=Body Weight (kg)  
AT=Averaging Time (days)

**Variable values:**

CS=95% Upper Confidence Limit of the mean chemical concentration measured in  
Zone A (Table 1)  
IR=100 mg/day (EPA 1991c)  
CF=10<sup>-6</sup> kg/mg  
FI=1 (all soil ingested is assumed to come from the site)  
EF=365 days/year (number of days in a year)  
ED=30 years (EPA 1991c)  
BW=70 kg (EPA 1990b)  
AT=10950 days for noncarcinogenic effects (ED x 365 days/year)  
25550 days for carcinogenic effects (70 years x 365 days/year)

**\*Formula was obtained from EPA 1989**

**Table 4.**

**Bluff Electric Works, Poplar Bluff, MO  
Adult-Dermal contact with chemicals in soil\***

**Equation:**

$$\text{Absorbed Dose (mg/kg/day)} = \text{CS} \times \text{CF} \times \text{SA} \times \text{AF} \times \text{ABS} \times \text{EF} \times \text{ED} / (\text{BW} \times \text{AT})$$

**Where:**

CS=Chemical Concentration in soil (mg/kg)  
CF=Conversion Factor (kg/mg)  
SA=Skin Surface Area for Contact (cm<sup>2</sup>/event)  
AF=Soil to Skin Adherence Factor (mg/cm<sup>2</sup>)  
ABS=Absorption Factor (no unit)  
EF=Exposure Frequency (events/year)  
ED=Exposure Duration (years)  
BW=Body Weight (kg)  
AT=Averaging Time (days)

**Variable values:**

CS=95% Upper Confidence limit on the mean chemical concentration measured  
(Table 1)  
CF=10<sup>-6</sup> kg/mg  
SA=5168 cm<sup>2</sup> (50<sup>th</sup> percentile Body Part Specific Surface Area--arms, hands, and  
heads of males and females--EPA 1990b)  
AF=1 mg/cm<sup>2</sup> (EPA 1991a)  
ABS=Chemical specific value (EPA 1991a)  
EF=365 days (number of days in a year)  
ED=30 years (EPA 1991c)  
BW=70 kg (EPA 1990b)  
AT=10950 days for noncarcinogenic effects (ED x 365 days/year)  
25550 days for carcinogenic effects (70 years x 365 days/year)

\*Formula was obtained from EPA 1989



**Table 5.**

**Bluff Electric Works, Poplar Bluff, MO**

**Formula for  
Child-Inhalation of chemicals in fugitive dust\***

**Equation:**

$$\text{Intake (mg/kg/day)} = \text{CA} \times \text{IR} \times \text{ET} \times \text{EF} \times \text{ED} / (\text{BW} \times \text{AT})$$

**Where:**

**CA=Chemical Concentration in air (mg/m<sup>3</sup>)**

**IR=Inhalation Rate (m<sup>3</sup>/hr)**

**ET=Exposure Time (hours/day)**

**EF=Exposure Frequency (days/year)**

**ED=Exposure Duration (years)**

**BW=Body Weight (kg)**

**AT=Averaging Time (days)**

**Variable values:**

**CA=Calculated value (section 2.3)**

**IR=0.83 m<sup>3</sup>/hour (EPA 1990b)**

**ET=1 hour/day (value defined by EPA personnel)**

**EF=40 days/year (value defined by EPA personnel)**

**ED=7 years (value defined by EPA personnel)**

**BW=30.5 kg (arithmetic mean of 50<sup>th</sup> percentile body weights of boys and girls aged 6-9 years and 9-12 years --body weights were obtained from EPA 1990b)**

**AT=2555 days for noncarcinogenic effects (ED x 365 days/year)**

**25550 days for carcinogenic effects (70 years x 365 days/year)**

**\*Formula was obtained from EPA 1989**

**Table 6.**  
**Bluff Electric Works, Poplar Bluff, MO**  
**Formula for**  
**Child-Incidental ingestion of chemicals in soil\***

Equation:

$$\text{Intake (mg/kg/day)} = \text{CS} \times \text{IR} \times \text{CF} \times \text{FI} \times \text{EF} \times \text{ED} / (\text{BW} \times \text{AT})$$

Where:

CS=Chemical Concentration in soil (mg/kg)  
 IR=Ingestion Rate (mg soil/day)  
 CF=Conversion Factor (kg/mg)  
 FI=Fraction Ingested from contaminated source (no units)  
 EF=Exposure Frequency (days/year)  
 ED=Exposure Duration (years)  
 BW=Body Weight (kg)  
 AT=Averaging Time (days)

Variable values:

CS=95% Upper Confidence Limit of the mean chemical concentration measured in  
 Zone A (Table 1)  
 IR=100 mg/day (EPA 1991c)  
 CF=10<sup>-6</sup> kg/mg  
 FI=1 (all soil ingested is assumed to come from the site)  
 EF=40 days/year (value provided by EPA personnel)  
 ED=7 years (value provided by EPA personnel)  
 BW=30.5 kg (arithmetic mean of 50<sup>th</sup> percentile body weights of boys aged  
 6-9 years and 9-12 years --body weights were obtained from EPA 1990b)  
 AT=2555 days for noncarcinogenic effects (ED x 365 days/year)  
 25550 days for carcinogenic effects (70 years x 365 days/year)

\*Formula was obtained from EPA 1989

**Table 7.**

**Bluff Electric Works, Poplar Bluff, MO**  
**Child-Dermal contact with chemicals in soil\***

**Equation:**

$$\text{Absorbed Dose (mg/kg/day)} = \text{CS} \times \text{CF} \times \text{SA} \times \text{AF} \times \text{ABS} \times \text{EF} \times \text{ED} / (\text{BW} \times \text{AT})$$

**Where:**

CS=Chemical Concentration in soil (mg/kg)  
CF=Conversion Factor (kg/mg)  
SA=Skin Surface Area for Contact (cm<sup>2</sup>/event)  
AF=Soil to Skin Adherence Factor (mg/cm<sup>2</sup>)  
ABS=Absorption Factor (no unit)  
EF=Exposure Frequency (events/year)  
ED=Exposure Duration (years)  
BW=Body Weight (kg)  
AT=Averaging Time (days)

**Variable values:**

CS=95% Upper Confidence limit on the mean chemical concentration measured  
(Table 1)  
CF=10<sup>-6</sup> kg/mg  
SA=3178 cm<sup>2</sup> (50<sup>th</sup> percentile Body Part Specific Surface Area--arms, hands, and  
heads of male and female children--EPA 1990b)  
AF=1 mg/cm<sup>2</sup> (EPA 1991a)  
ABS=Chemical specific value (EPA 1991a)  
EF=40 days (value provided by EPA personnel)  
ED=7 years (value provided by EPA personnel)  
BW=30.5 kg (arithmetic mean of 50<sup>th</sup> percentile body weights of boys aged  
6-9 years and 9-12 years --body weights were obtained from EPA 1990b)  
AT=2555 days for noncarcinogenic effects (ED x 365 days/year)  
25550 days for carcinogenic effects (70 years x 365 days/year)

**\*Formula was obtained from EPA 1989**

## 4.0 TOXICITY ASSESSMENT

### 4.1 NONCARCINOGENIC EFFECTS

Reference Dose (RfD) and Reference Concentration (RfC) are the toxicity values used in assessing noncarcinogenic effects from oral and inhalation exposure, respectively. EPA Integrated Risk Information System (IRIS) contains contaminant specific RfD and RfC values which have been verified by an intra-Agency work group. RfD and RfC values which have not been verified may be found in EPA Health Effects Assessment Summary Tables (HEAST, EPA 1991b).

Currently, there are no toxicity values for lead in IRIS or HEAST (EPA 1991b). Lead intake affects virtually every system in the body. Among the most serious effects of lead exposure are the central nervous system effects seen in young children. These effects range from impaired learning ability and a decrease in IQ scores to brain damage. Other effects are a decrease in growth of children, a decrease in hearing acuity and adverse effects on the kidneys and hematopoietic systems (CDC 1991). To assess the adverse health effects of lead exposure, EPA currently advises use of the Lead Biokinetic Uptake Model. This model combines intake variables from several potential lead exposure pathways and predicts blood lead levels for children. If the predicted blood lead level is greater than 10 ug/dL, a health hazard is considered to exist.

No RfD was listed in HEAST for copper. However, a drinking water criteria of 1.3 mg/l was provided. This was converted to an RfD of  $3.7 \times 10^{-2}$  using a formula taken from the preface to HEAST (EPA 1991). This formula is:

$$\text{RfD} = (\text{Drinking Water Criteria})(\text{Intake Rate})/(\text{Body Weight})$$

where Intake Rate = 2 L and Body Weight = 70 kg.

In order to assess noncarcinogenic effects from dermal exposure, it is necessary to adjust oral RfD's from the administered doses given in IRIS and HEAST to absorbed doses. Because dermal contact with copper may cause contact dermatitis, allergic reactions, skin discoloration and may bypass removal mechanisms, this adjustment is not appropriate (Appendix IV). Thus, dermal contact with copper is evaluated qualitatively in the risk characterization section.

Because no RfC had been determined, inhalation exposure was not evaluated for copper.

An oral RfD of  $5 \times 10^{-1}$  mg/kg/day is listed in HEAST for 2-butanone. The RfD is based on developmental effects, specifically fetotoxicity. Assessment of noncarcinogenic effects for the dermal route of exposure required adjustment of the RfD from an oral dose to administered dose using a factor of 100%.

### 3.2 CARCINOGENIC EFFECTS

Slope Factors found in IRIS and HEAST (EPA 1991b) are used to assess carcinogenic effects for specific contaminants. A Slope Factor (SF) is a plausible upper-bound estimate of the probability of a response per unit intake of a chemical expressed over a lifetime.

PCBs were the only carcinogenic compound found at the Bluff Electric Works site. They are considered B2 carcinogens, indicating there is adequate data to show carcinogenicity in animals, but human data is lacking. The SF listed in IRIS for PCBs is  $7.7 \text{ (mg/kg/day)}^{-1}$ . Oral PCB intake was associated with the incidence of liver tumors in rats.

Assessment of carcinogenic effects for the dermal route of exposure required adjustment of the SF from an oral dose to administered dose using a factor of 100%.

## 5.0 RISK CHARACTERIZATION

### 5.1 NONCARCINOGENIC EFFECTS

Noncancer hazard quotients are calculated for each contaminant in each pathway by dividing the Chronic Daily Intake (CDI) by the RfD. The noncancer hazard quotients within an exposure pathway are summed to give the pathway hazard index. The Total Hazard Index is then calculated by summing the pathway hazard indices. According to RAGS (EPA 1989), human health risks may exist when the Total Hazard Index exceeds unity (1.0).

#### 5.1.1 PRESENT DAY SCENARIO - RME 1

Incidental ingestion of  $5.9 \times 10^{-3}$  mg/kg/day of copper and  $4.3 \times 10^{-4}$  mg/kg/day of 2-butanone by a 30.5 kg child resulted in a hazard index value of 0.16. Because this is less than 1, incidental ingestion of 100 mg/day of soil contaminated with 1795 mg/kg of copper and 119 mg of 2-butanone 40 days per year for 7 years did not appear to pose a health risk to the child.

Dermal contact with  $1.4 \times 10^{-3}$  mg/kg/day of 2-butanone on 3178 cm<sup>2</sup> of exposed skin on a 30.5 kg child resulted in a hazard index of 0.027. Because this is less than 1, dermal contact with 2-butanone for 40 days per year for 7 years is not expected to pose a health risk to the child.

Dermal contact with copper cannot be assessed quantitatively. Copper is an essential nutrient and there are several gastrointestinal mechanisms to prevent excess absorption of ingested copper. Dermal absorption of copper, however, would bypass these homeostatic mechanisms. As a result of dermal contact with copper, individuals may experience allergic contact dermatitis and localized itching.

The Lead Biokinetic Uptake Model was used to predict blood lead levels of children playing on the site. Default values were used for air, water, food and paint intake variables. Soil and dust concentrations of 2092 ug/g were used in the soil and dust intake calculations. Blood lead levels between 17.4 and 19.5 ug/dL were predicted by the model. EPA generally considers a blood lead level of 10 ug/dL or greater to present a potential health risk, thus lead concentrations present at the Bluff Electric Works site may pose a health risk to children playing in zone A of the Bluff Electric Works site.

The total hazard index for ingestion of copper and 2-butanone from zone A of the Bluff Electric Works site by a 30.5 kg child for 40 days per year over a 7 year period is 0.19. Because the index value is less than 1, the site does not appear to pose a health risk to a child ingesting copper and 2-butanone. However, dermal contact with copper may cause localized allergic dermatitis and itching. Ingestion of lead from the site may cause elevated blood lead levels which indicates a potential health risk.

### 5.1.2 PRESENT DAY SCENARIO - RME 2

No noncarcinogenic health risks were evaluated for RME 2.

### 5.1.3 FUTURE LAND USE

For an adult living in zone A for 30 years ingesting 100 mg of soil each day contaminated with 1795 mg copper and 119 mg of 2-butanone per kg of soil, the Hazard Index was 0.072. This is substantially less than 1, thus no adverse health effects would be expected ingestion of copper and 2-butanone in soil.

Dermal contact with  $8.8 \times 10^{-3}$  mg/kg/day of 2-butanone on 5168 cm<sup>2</sup> of exposed skin on a 70 kg adult resulted in a hazard index of 0.18. Because this is less than 1, dermal contact with 2-butanone 365 days per year for 30 years is not expected to pose a health risk to an adult.

Dermal contact with copper cannot be assessed quantitatively. Copper is an essential nutrient, thus several gastrointestinal mechanisms exist to prevent excess absorption of ingested copper. Dermal absorption of copper, however, would bypass these homeostatic mechanisms. As a result of dermal contact with copper, individuals may experience allergic contact dermatitis and localized itching.

The Lead Biokinetic Uptake Model was used to predicted blood lead levels of a person living in zone A of the Bluff Electric Works site. Default values were used for air, water, food and paint intake variables. Soil and dust concentrations of 2092 ug/g were used in the soil and dust intake calculations. Blood lead levels between 17.4 and 19.5 ug/dL were predicted by the model. EPA generally considers a blood lead level of 10 ug/dL or greater to present a potential health risk, thus lead concentrations present at the Bluff Electric Works site may pose a health threat to a person living on the site.

The total hazard index for ingestion of copper and 2-butanone from zone A of the Bluff Electric Works site by a 70 kg adult, 365 days per year over a 30 year period is 0.25. Because the index value is less than 1, the site does not appear to pose a health risk to a adult ingesting copper and 2-butanone. However, dermal contact with copper may cause localized allergic dermatitis and itching. Ingestion of lead from the site may cause elevated blood lead levels which indicates a potential health risk.

## 5.2 CARCINOGENIC EFFECTS

Lifetime excess cancer risks are calculated for each contaminant in each pathway by multiplying the slope factor by the Chronic Daily Intake (CDI). Within a pathway, the chemical specific risks are summed to give the total pathway risk. The Total Lifetime Excess Cancer Risk is then determined by summing the total pathway risks. Region VII EPA generally considers an unacceptable cancer risk to exist when the Total Lifetime Excess Cancer Risk exceeds  $1 \times 10^{-4}$ .

### 5.2.1 CURRENT EXPOSURE SCENARIO - RME 1

The Lifetime Excess Cancer Risk posed to a 30 kg child playing in zone A of the Bluff Electric Works site 40 days/year for 7 years wearing a t-shirt, jeans, shoes and socks was  $1.1 \times 10^{-3}$  (Table 8). Pathway Cancer Risks for incidental ingestion and dermal contact were  $2.2 \times 10^{-4}$  and  $8.6 \times 10^{-4}$ , respectively. Cancer Risks for these two pathways exceed the acceptable level ( $1 \times 10^{-4}$ ), thus, a cancer risk may be posed to a child wearing a t-shirt, jeans, shoes and socks playing in zone A 40 days/year over a 7 year period (Table 8).

### 5.2.2 CURRENT EXPOSURE SCENARIO - RME 2

An adult living adjacent to the Bluff Electric Works site inhaling PCB contaminated fugitive dust for 30 years would face a Lifetime Excess Cancer Risk of  $1.7 \times 10^{-5}$  (Table 8).

### 5.2.3 FUTURE EXPOSURE SCENARIO

The Total Excess Lifetime Cancer Risk for an adult living in zone A for 30 years, wearing a t-shirt, jeans, shoes and socks and ingesting 100 mg of contaminated soil each day is  $2.4 \times 10^{-2}$ . Pathway cancer risks for incidental ingestion and dermal contact with contaminated soil were above  $1 \times 10^{-4}$  ( $3.8 \times 10^{-3}$  and  $2.4 \times 10^{-2}$ , respectively). The Bluff Electric Works site would pose a cancer risk to a person living in zone A for a 30 year period (Table 8).

## 5.3 UNCERTAINTIES

Several areas of uncertainty are inherent in the risk assessment process. Most intake variables used are 95% upper confidence limits of the mean variable value. This may overestimate the true risk posed by the site. Many RfDs, RfCs and SFs are based on toxicity tests carried out on animals. It is not known if results of these tests are applicable to humans.

There are some site specific areas of uncertainty in this risk assessment. Only two samples were analyzed for dioxins and furans and none of these compounds were included in the risk assessment. If dioxins and furans are present on the site, the cancer risks in this assessment could be underestimated.

Zone A was chosen for use in the risk assessment because the highest PCB, lead and copper concentrations were found in that zone. However, other portions of the Bluff Electric works site had higher concentrations of 2-butanone. To address this problem, hazard quotients were calculated for all pathways within RMEs 1 and 3 using the highest UCL value (239 mg/kg). Hazard quotients calculated using this value ranged from 0.0017 (soil ingestion for RME 1) to 0.35 (dermal contact for RME 3). Total hazard indices for both RMEs remained below 1.0, indicating the higher concentrations of 2-butanone did not present a health risk.



Table 8.

**Bluff Electric Works, Poplar Bluff, MO**  
**Lifetime Excess Cancer Risks**

Pathway	PCB Concentration	Intake/SF Adjusted for absorption	Intake (mg/kg/day)	SF (mg/kg/day) <sup>-1</sup>	Pathway Cancer Risk	Excess Lifetime Cancer Risk
Current Exposure Scenario: Adult living adjacent to the site inhaling contaminated air 24 hrs/day over a 30 year period.						
Inhalation of PCBs in dust	1.0 x 10 <sup>-5</sup> ug/m <sup>3</sup>	no	2 x 10 <sup>-5</sup>	7.7	1.7 x 10 <sup>-5</sup>	1.7 x 10 <sup>-5</sup>
Current Exposure Scenario: Child trespassing on the site 1 hr/day, 40 days/year, wearing a t-shirt, jeans, shoes and socks.						
Incidental ingestion of PCBs in soil	815 mg/kg	no	2.9 x 10 <sup>-5</sup>	7.7	2.2 x 10 <sup>-4</sup>	
Dermal contact with PCBs in soil	815 mg/kg	yes	1.1 x 10 <sup>-4</sup>	7.7	8.6 x 10 <sup>-4</sup>	
Inhalation of PCBs in dust	1.0 x 10 <sup>-5</sup> ug/m <sup>3</sup>	no	5.7 x 10 <sup>-9</sup>	7.7	4.4 x 10 <sup>-8</sup>	1.1 x 10 <sup>-3</sup>
Future Exposure Scenario: Adult living in a residence on zone A for a 30 year period.						
Inhalation of PCBs in soil	815 mg/kg	no	5.0 x 10 <sup>-4</sup>	7.7	3.8 x 10 <sup>-3</sup>	
Dermal contact with PCBs in soil	815 mg/kg	yes	3.1 x 10 <sup>-3</sup>	7.7	2.4 x 10 <sup>-2</sup>	
Inhalation of PCBs in dust	1.0 x 10 <sup>-5</sup> ug/m <sup>3</sup>	no	2.3 x 10 <sup>-6</sup>	7.7	1.8 x 10 <sup>-5</sup>	2.8 x 10 <sup>-2</sup>

The Lead Biokinetic Uptake Model used to predict blood lead levels was developed for children aged 0-6 years, the ages at which effects from lead exposure are most dramatic. Effects of lead exposure are less prominent in older children and adults, thus the risks from ingesting lead at the Bluff Electric Works site for RME 2 and 3 are probably lower than reported in this assessment.

The Oral PCB RfD was used as an inhalation RfC. Inhalation exposure contributes substantially to the overall risk (ATSDR 1991). This may be revised upon receipt of PCB information requested from EPA's Environmental Criteria and Assessment Office.

## 6.0 SUMMARY

Bluff Electric Works is an abandoned transformer sales and service facility in Poplar Bluff, MO. Soil at the site is contaminated with copper, lead, 2-butanone and PCBs. The site is zoned industrial, but is surrounded by residential land. Both present and future land uses were considered in this risk assessment.

Two RMEs were considered for current land use: a child trespasser on the site playing in contaminated soil from zone A and an adult living adjacent to the site inhaling fugitive dust. The only noncarcinogenic risk posed was to children ingesting lead contaminated soil from zone A. Blood lead levels may be elevated in these children. Carcinogenic risks, ranging from  $1.7 \times 10^{-5}$  to  $8.6 \times 10^{-4}$ , were present for both RMEs.

The RME considered for the future land use scenario was an adult living in zone A for a 30 year period. Incidental ingestion of lead may cause elevated blood lead levels in this scenario. Carcinogenic risks from incidental ingestion and dermal contact ( $3.8 \times 10^{-3}$  and  $2.4 \times 10^{-2}$ , respectively) were above the acceptable range.

Prepared by:

 2/20/92  
Cherri Baysinger-Daniel, Missouri Department of Health


## LITERATURE CITED

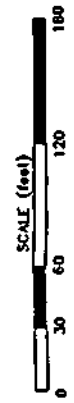
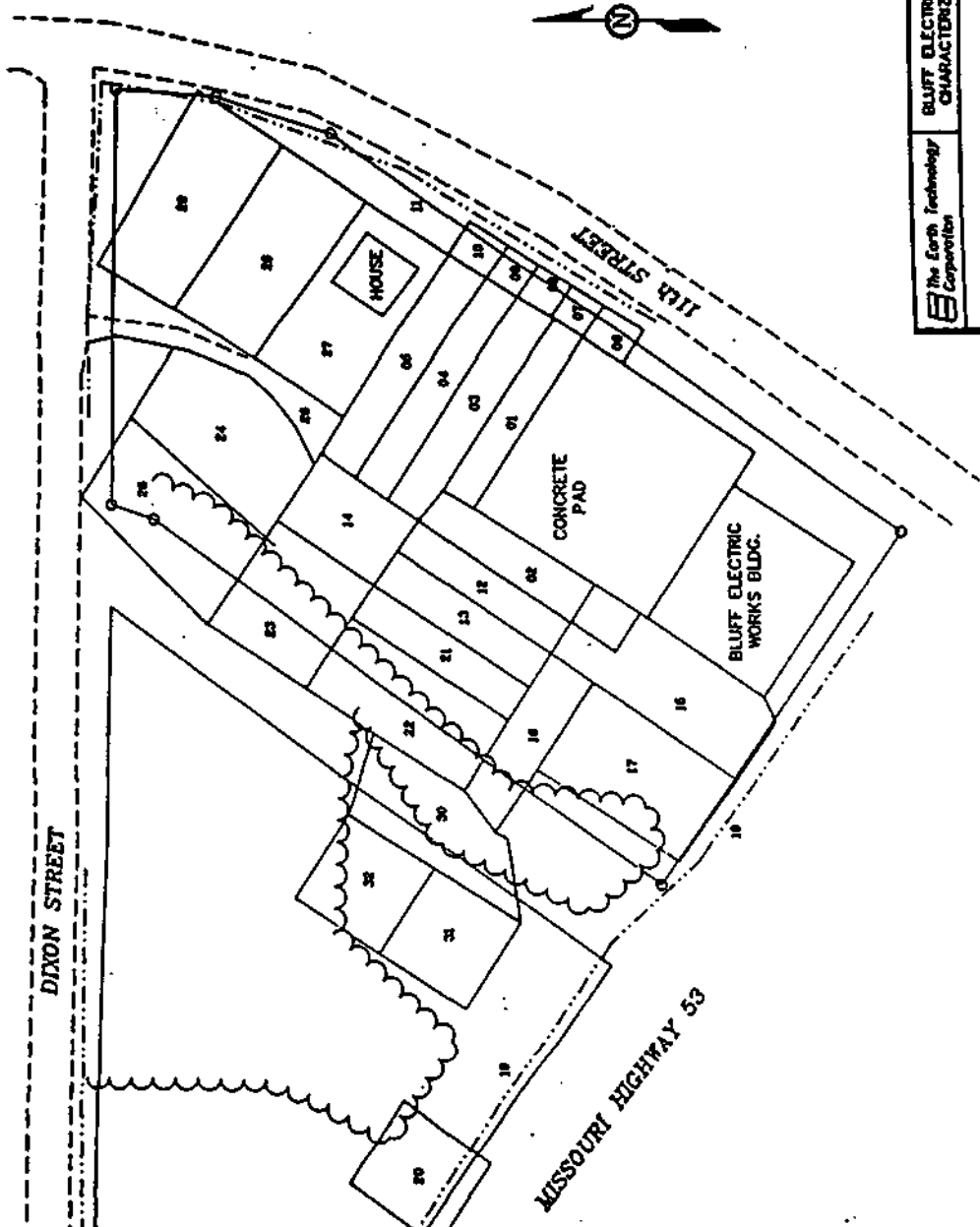
- Agency for Toxic Substances and Disease Registry (ATSDR). 1991. Draft Toxicological Profile for Selected PCBs (Arochlor-1260, -1254, -1248, -1242, -1232, -1221, and -1016). U.S. Department of Health and Human Services, Atlanta, GA.
- Centers for Disease Control (CDC). 1991. Preventing Lead Poisoning in Children. U. S. Department of Health and Human Services, Atlanta, GA.
- Ecology and the Environment (E & E). 1989. Bluff Electric Works Site Assessment Report. Unpublished Report.
- Environmental Protection Agency (EPA). 1989. Risk Assessment Guidance for Superfund. Volume I: Human Health Evaluation Manual (Part A). Office of Emergency and Remedial Response. EPA/540/1-89/002.
- Environmental Protection Agency (EPA). 1990a. Trip Report-Property perimeter Sampling, Bluff Electric Works Site, Poplar Bluff, Missouri. Unpublished Memorandum.
- Environmental Protection Agency (EPA). 1990b. Exposures Factors Handbook. Office of Health and Environmental Assessment, Washington, D. C. EPA/600/8-89/043.
- Environmental Protection Agency (EPA). 1991a. Interim Guidance for Dermal Exposure Assessment. Office of Health and Environmental Assessment, Washington, D. C. OHEA-E 367.
- Environmental Protection Agency (EPA). 1991b. Health Effects Assessment Summary Tables, Annual FY-1991. Office of Emergency and Remedial Response, Washington, D. C. OERR 9200.6-303 (91-1).
- Environmental Protection Agency (EPA). 1991c. Standard Default Exposure Factors. Office of Solid Waste and Emergency Response, Washington, D. C. OSWER Directive 9284.6-03.
- The Earth Technology Corporation. 1991. Site Characterization Study Report - Bluff Electric Works, Poplar Bluff, Missouri. The Earth Technology Corporation, Houston, TX.

## **APPENDIX I**

**Bluff Electric Works Site, Poplar Bluff, MO**

**Sampling Results from the Preliminary Site Assessment  
Conducted by EPA Technical Assistance Team in March 1989**

 The Earth Technology Corporation	BLUFF ELECTRIC WORKS SITE CHARACTERIZATION STUDY
	<b>FIGURE 1-5</b> <b>U.S. EPA SAMPLING GRID</b>
	PRELIMINARY SITE ASSESSMENT - APRIL 1989 Drawn by: E. Stenford      Date: JULY 18, 1991 530 Paul Oak Boulevard • Suite 750 • Meriden • CT 06450 • 779-217



**LEGEND**

— DITCH CENTER-LINE

~~~~~ VEGETATED AREA

TABLE 3  
Sample Summary  
Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLE NUMBER | TOTAL PCBs (PPM)<br>Unless Otherwise<br>Noted | MEDIA               | COMMENTS           |
|---------------|-----------------------------------------------|---------------------|--------------------|
| PK871000      | 0.000<br>0.000                                | Surface Soil (0-2") | Background Soil    |
| PK871001      | 5.851<br>2.859                                | Surface Soil (0-2") | Gridded Section 01 |
| PK871002      | 3.008<br>2.859                                | Surface Soil (0-2") | Gridded Section 02 |
| PK871003      | 2.982<br>2.458                                | Surface Soil (0-2") | Gridded Section 03 |
| PK871004      | 0.517<br>0.480                                | Surface Soil (0-2") | Gridded Section 04 |
| PK871005      | 0.148<br>0.142                                | Surface Soil (0-2") | Gridded Section 05 |
| PK871006      | 93.724<br>75.110                              | Surface Soil (0-2") | Gridded Section 06 |
| PK871007      | 80.661<br>66.085                              | Surface Soil (0-2") | Gridded Section 07 |
| PK871008      | 1.812<br>1.641                                | Surface Soil (0-2") | Gridded Section 08 |
| PK871009      | 1.175<br>1.034                                | Surface Soil (0-2") | Gridded Section 09 |
| PK871010      | 0.170<br>0.185                                | Surface Soil (0-2") | Gridded Section 10 |
| PK871011      | 6.557<br>6.321                                | Surface Soil (0-2") | Gridded Section 11 |
| PK871012      | 65.489<br>67.642                              | Surface Soil (0-2") | Gridded Section 12 |
| PK871013      | 54.256<br>54.422                              | Surface Soil (0-2") | Gridded Section 13 |
| PK871014      | 47.390<br>49.040                              | Surface Soil (0-2") | Gridded Section 14 |

TABLE 3 (continued)

| SAMPLE NUMBER | TOTAL PCBs (PPM)<br>Unless Otherwise<br>Noted | MEDIA               | COMMENTS                        |
|---------------|-----------------------------------------------|---------------------|---------------------------------|
| PK871015      | 10.262<br>9.445                               | Surface Soil (0-2") | Gridded Section 15              |
| PK871016      | 52.320<br>54.360                              | Surface Soil (0-2") | Gridded Section 16              |
| PK871017      | 16.262<br>15.906                              | Surface Soil (0-2") | Gridded Section 17              |
| PK871018      | 0.759<br>0.713                                | Surface Soil (0-2") | Gridded Section 18              |
| PK871019      | 6.549<br>6.379                                | Surface Soil (0-2") | Gridded Section 19              |
| PK871020      | 7.507<br>7.087                                | Surface Soil (0-2") | Gridded Section 20              |
| PK871021      | 11.140<br>10.270                              | Surface Soil (0-2") | Gridded Section 21              |
| PK871022      | 9.421<br>8.752                                | Surface Soil (0-2") | Gridded Section 22              |
| PK871023      | 498.075<br>644.384                            | Surface Soil (0-2") | Gridded Section 23              |
| PK871024      | 5.278<br>5.224                                | Surface Soil (0-2") | Gridded Section 24              |
| PK871025      | 10.284<br>10.128                              | Surface Soil (0-2") | Gridded Section 25              |
| PK871026      | 2.793<br>2.476                                | Surface Soil (0-2") | Gridded Section 26              |
| PK871027      | 0.143<br>0.141                                | Surface Soil (0-2") | Gridded Section 27              |
| PK871027D     | 0.043<br>0.050                                | Surface Soil (0-2") | Duplicate of Gridded Section 27 |
| PK871028      | 0.065<br>0.062                                | Surface Soil (0-2") | Gridded Section 28              |
| PK871029      | 0.000<br>0.000                                | Surface Soil (0-2") | Gridded Section 29.             |



TABLE 3 (continued)

| SAMPLE NUMBER | TOTAL PCBs (PPM)<br>Unless Otherwise<br>Noted | MEDIA               | COMMENTS                                                                 |
|---------------|-----------------------------------------------|---------------------|--------------------------------------------------------------------------|
| PK871030      | 121.892<br>118.782                            | Surface Soil (0-2") | Gridded Section 30                                                       |
| PK871031      | 80.771<br>79.224                              | Surface Soil (0-2") | Gridded Section 31                                                       |
| PK871032      | 72.919<br>68.219                              | Surface Soil (0-2") | Gridded Section 32                                                       |
| PK871033      | 3.331<br>3.246                                | Surface Soil (0-2") | Multi-aliquot grab sample from culvert, in<br>Section 11                 |
| PK871033D     | 2.501<br>2.428                                | Surface Soil (0-2") | Duplicate of PK871033                                                    |
| PK871034      | 0.786<br>0.763                                | Surface Soil (0-2") | Multi-aliquot grab sample near concrete pad, in<br>Section 08            |
| PK871034D     | 0.653<br>0.633                                | Surface Soil (0-2") | Duplicate of PK871034                                                    |
| PK871035      | 11.725<br>10.779                              | Surface Soil (0-2") | Multi-aliquot grab sample near concrete pad, in<br>Section 06            |
| PK871035D     | 6.353<br>6.046                                | Surface Soil (0-2") | Duplicate of PK871035                                                    |
| PK871036      | 10.571<br>10.172                              | Surface Soil (0-2") | Multi-aliquot grab sample near concrete pad, in<br>Section 01            |
| PK871037      | 0.634<br>0.598                                | Surface Soil (0-2") | Multi-aliquot grab sample near concrete pad, in<br>Section 02            |
| PK871038      | 1.243<br>1.285                                | Surface Soil (0-2") | Multi-aliquot grab sample from stained area NE<br>corner, Section 21     |
| PK871039      | 1.660<br>1.694                                | Surface Soil (0-2") | Multi-aliquot grab sample from stained area south<br>portion, Section 23 |
| PK871040      | 0.343<br>0.311                                | Surface Soil (0-2") | Multi-aliquot grab sample from drainage ditch SW<br>of BEW building      |
| PK871041      | 14.035<br>13.751                              | Surface Soil (0-2") | Multi-aliquot grab sample from culvert, in<br>Section 18                 |
| PK871042      | 5353.299<br>4006.666                          | Surface Soil (0-2") | Multi-aliquot grab sample near capacitor, west of<br>Section 22          |

TABLE 3 (continued)

| SAMPLE NUMBER | TOTAL PCBs (PPM)<br>Unless Otherwise<br>Noted | MEDIA               | COMMENTS                                                     |
|---------------|-----------------------------------------------|---------------------|--------------------------------------------------------------|
| PK871043      | 33.954<br>47.145                              | Surface Soil (0-2") | Multi-aliquot grab sample near transformer, NW of Section 25 |
| PK871060      | 0.000<br>0.000                                | Soil Core (0-8")    | Core sample north of utility pole, in Section 08             |
| PK871061      | 0.000<br>0.000                                | Soil Core (8-16")   | Core sample north of utility pole, in Section 08             |
| PK871070      | 0.000<br>0.000                                | Soil Core (0-8")    | Core sample collected near NE corner of concrete pad         |
| PK871071      | 0.000<br>0.000                                | Soil Core (8-16")   | Core sample collected near NE corner of concrete pad         |
| PK871080      | 55.953<br>50.630                              | Core Sample (0-8")  | Soil core sample near NW corner of concrete pad              |
| PK871081      | 793.019<br>710.172                            | Core Sample (8-16") | Soil core sample near NW corner of concrete pad              |
| PK871090      | 0.000<br>0.000                                | Core Sample (0-8")  | Soil core sample from SW corner of Section 22                |
| PK871091      | 0.000<br>0.000                                | Core Sample (8-16") | Soil core sample from SW corner of Section 22                |
| PK871100      | 0.000<br>0.000                                | Core Sample (0-8")  | Soil core sample along border of Section 23 and Section 14   |
| PK871101      | 0.000<br>0.000                                | Core Sample (8-16") | Soil core sample along border of Section 23 and Section 14   |
| PK871110      | 1.818<br>1.820                                | Core Sample (0-8")  | Soil core sample near electrical debris in Section 22        |
| PK871111      | 0.000<br>0.000                                | Core Sample (8-16") | Soil core sample near electrical debris in Section 22        |
| PK871120      | 21.052<br>20.362                              | Core Sample (0-8")  | Soil core sample near NW corner BSW building in Section 15   |
| PK871121      | 1.775<br>1.735                                | Core Sample (8-16") | Soil core sample near NW corner BSW building in Section 15   |

TABLE 3 (continued)

| SAMPLE NUMBER | TOTAL PCBs (PPM)<br>Unless Otherwise<br>Noted        | MEDIA               | COMMENTS                                                         |
|---------------|------------------------------------------------------|---------------------|------------------------------------------------------------------|
| PK871130      | 1.091<br>1.025                                       | Core Sample (0-8")  | Soil core sample from drainage ditch in<br>Section 18            |
| PK871131      | 4.777<br>4.249                                       | Core Sample (8-16") | Soil core sample from drainage ditch in<br>Section 18            |
| PK871300      | 39.217<br>36.414                                     | Concrete Dust       | Concrete dust from pad North of BEW building                     |
| PK871301      | 12.270<br>11.621                                     | Concrete Dust       | Concrete dust from interior of BEW building                      |
| PK871302      | 20.286<br>18.489                                     | Asphalt             | Asphalt lot East and South of BEW building                       |
| PK871400      | 23.492<br>22.227                                     | Dust                | Vacuum sample from West Office and Store Room<br>in BEW building |
| PK871401      | 116.140<br>120.019                                   | Dust                | Vacuum sample from East Service Warehouse in<br>BEW building     |
| PK871200      | 0.008mg/cm <sup>2</sup><br>0.006mg/cm <sup>2</sup>   | Wipe                | Wipe Field Blank                                                 |
| PK871201      | 0.006mg/cm <sup>2</sup><br>Not Analyzed              | Wipe                | Exterior siding of abandoned house                               |
| PK871202      | 0.339mg/cm <sup>2</sup><br>0.325mg/cm <sup>2</sup>   | Wipe                | Interior West wall of the East Delivery Room                     |
| PK871203      | 0.640mg/cm <sup>2</sup><br>0.646mg/cm <sup>2</sup>   | Wipe                | Floor of West Stock Room                                         |
| PK871204      | 25.495mg/cm <sup>2</sup><br>32.143mg/cm <sup>2</sup> | Wipe                | Wooden shelves in West Service Room                              |

**A-2 Summary of PCB Analysis - CLP Laboratory**

**TABLE A-2**  
**SUMMARY OF PCB ANALYSIS - CLP LABORATORY**  
**11-13 APRIL 1989**  
**SITE CHARACTERIZATION STUDY**

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES         | PK871000 | PK871006 | PK871007  | PK871012 |
|-----------------|----------|----------|-----------|----------|
| PCB 1221, ug/kg | 200 U    | 20000 U  | 2000 U    | 20000 U  |
| PCB 1242, ug/kg | 300 U    | 30000 U  | 3000 U    | 30000 U  |
| PCB 1248, ug/kg | 300 U    | 12000 J  | 3000 U    | 30000 U  |
| PCB 1254, ug/kg | 300 U    | 3000 U   | 3000 U    | 30000 U  |
| PCB 1260, ug/kg | 38 J     | 65000    | 130000    | 89000    |
| SAMPLES         | PK871013 | PK871014 | PK871016  | PK871017 |
| PCB 1221, ug/kg | 20000 U  | 20000 U  | 200000 U  | 20000 U  |
| PCB 1242, ug/kg | 30000 U  | 30000 U  | 300000 U  | 30000 U  |
| PCB 1248, ug/kg | 30000 U  | 30000 U  | 300000 U  | 30000 U  |
| PCB 1254, ug/kg | 30000 U  | 30000 U  | 300000 U  | 30000 U  |
| PCB 1260, ug/kg | 37000    | 67000    | 2100000   | 170000   |
| SAMPLES         | PK871023 | PK871030 | PK871031  | PK871032 |
| PCB 1221, ug/kg | 100000 U | 20000 U  | 20000 U   | 80000 U  |
| PCB 1242, ug/kg | 150000 U | 30000 U  | 30000 U   | 120000 U |
| PCB 1248, ug/kg | 1700000  | 30000 U  | 30000 U   | 120000 U |
| PCB 1254, ug/kg | 150000 U | 30000 U  | 30000 U   | 230000   |
| PCB 1260, ug/kg | 200000   | 280000   | 45000     | 40000 U  |
| SAMPLES         | PK871036 | PK871041 | PK871042  | PK871043 |
| PCB 1221, ug/kg | 20000 U  | 20000 U  | 2000000 U | 20000 U  |
| PCB 1242, ug/kg | 30000 U  | 30000 U  | 3000000 U | 30000 U  |
| PCB 1248, ug/kg | 30000 U  | 30000 U  | 3000000 U | 30000 U  |
| PCB 1254, ug/kg | 30000 U  | 30000 U  | 8000000   | 30000 U  |
| PCB 1260, ug/kg | 23000    | 150000   | 1000000 U | 270000   |
| SAMPLES         | PK871080 | PK871081 | PK871120  | PK871121 |
| PCB 1221, ug/kg | 200000 U | 1000 U   | 200000 U  | 200 U    |
| PCB 1242, ug/kg | 300000 U | 1500 U   | 300000 U  | 300 U    |
| PCB 1248, ug/kg | 300000 U | 1500 U   | 300000 U  | 930      |
| PCB 1254, ug/kg | 300000 U | 1100 J   | 300000 U  | 6500     |
| PCB 1260, ug/kg | 1300000  | 500      | 490000    | 750      |
| SAMPLES         | PK871300 | PK871301 | PK871302  | PK871400 |
| PCB 1221, ug/kg | 20000 U  | 20000 U  | 20000 U   | 100 U    |
| PCB 1242, ug/kg | 30000 U  | 30000 U  | 30000 U   | 150 U    |
| PCB 1248, ug/kg | 30000 U  | 30000 U  | 30000 U   | 6500     |
| PCB 1254, ug/kg | 30000 U  | 30000 U  | 30000 U   | 8100     |
| PCB 1260, ug/kg | 77000    | 44000    | 41000     | 19000    |
| SAMPLES         | PK871401 |          |           |          |
| PCB 1221, ug/kg | 100 U    |          |           |          |
| PCB 1242, ug/kg | 910      |          |           |          |
| PCB 1248, ug/kg | 150 U    |          |           |          |
| PCB 1254, ug/kg | 2500     |          |           |          |
| PCB 1260, ug/kg | 4500     |          |           |          |

**TABLE A-4**  
**SUMMARY OF TOTAL METALS ANALYSIS**  
**11-13 APRIL 1989**  
**SITE CHARACTERIZATION STUDY**

Bluff Electric Works  
 Poplar Bluff, Missouri

*W*      *57 quad 6*      *57 quad 7*      *57 quad 12*

| SAMPLES           | PK871000 | PK871006 | PK871007 | PK871012 |
|-------------------|----------|----------|----------|----------|
| SILVER, mg/kg     | .24 U    | .31      | .78      | 29       |
| ALUMINUM, mg/kg   | 13000.   | 2200.    | 6000.    | 3400.    |
| ARSENIC, mg/kg    | 4.5 J    | 4.3 J    | 5.9 J    | 3.4 J    |
| BARIUM, mg/kg     | 100.     | 96.      | 150.     | 100.     |
| BERYLLIUM, mg/kg  | .36      | .16      | .30      | .20      |
| CADMIUM, mg/kg    | .19      | 10.      | 4.9      | 3.1      |
| COBALT, mg/kg     | 5.1      | 29       | 7.9      | 4.6      |
| CHROMIUM, mg/kg   | 15.      | 15.      | 22       | 16.      |
| COPPER, mg/kg     | 17.      | 1000.    | 2900.    | 1400.    |
| IRON, mg/kg       | 17000.   | 9800.    | 21000.   | 22000.   |
| MANGANESE, mg/kg  | 150.     | 150.     | 330.     | 190.     |
| MOLYBDENUM, mg/kg | .24 U    | .50      | .48      | .20 U    |
| NICKEL, mg/kg     | 9.2      | 6.9      | 15.      | 8.0      |
| LEAD, mg/kg       | 21.      | 310.     | 360.     | 5100.    |
| ANTIMONY, mg/kg   | 1.2 U    | 3.3      | 1.3 U    | 5.1      |
| SELENIUM, mg/kg   | 12 U     | 10. U    | 13. U    | 10. U    |
| TITANIUM, mg/kg   | N/A      | N/A      | N/A      | N/A      |
| THALLIUM, mg/kg   | 7.3 U    | 6.0 U    | 7.6 U    | 6.0 U    |
| VANADIUM, mg/kg   | 32       | 7.7      | 21.      | 15.      |
| ZINC, mg/kg       | 38.      | 2400.    | 590.     | 180.     |
| CALCIUM, mg/kg    | 2400.    | 72000.   | 23000.   | 21000.   |
| MAGNESIUM, mg/kg  | 2000.    | 6100.    | 12000.   | 12000.   |
| SODIUM, mg/kg     | 49. U    | 54.      | .64      | 68.      |
| POTASSIUM, mg/kg  | 510.     | 230.     | .490     | 250.     |

TABLE A-4 (continued)  
SUMMARY OF TOTAL METALS ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works

Poplar Bluff, Missouri

5 grid 13

5 grid 14

5 grid 16

5 grid 17

| SAMPLES           | PK871013 | PK871014 | PK871016 | PK871017 |
|-------------------|----------|----------|----------|----------|
| SILVER, mg/kg     | .29      | .23 U    | .51      | .29 U    |
| ALUMINUM, mg/kg   | 2600.    | 6600.    | 5700.    | 5100.    |
| ARSENIC, mg/kg    | 5.1 J    | 5.7 J    | 5.3 J    | 5.0 J    |
| BARIUM, mg/kg     | 84.      | 70.      | 100.     | 140.     |
| BERYLLIUM, mg/kg  | .16      | .20      | .27      | .26      |
| CADMIUM, mg/kg    | 2.4      | 1.7      | 3.1      | 3.5      |
| COBALT, mg/kg     | 3.5      | 4.1      | 5.0      | 6.5      |
| CHROMIUM, mg/kg   | 14.      | 16.      | 17.      | 15.      |
| COPPER, mg/kg     | 1500.    | 280.     | 740.     | 2100.    |
| IRON, mg/kg       | 10000.   | 15000.   | 14000.   | 15000.   |
| MANGANESE, mg/kg  | 200.     | 210.     | 270.     | 490.     |
| MOLYBDENUM, mg/kg | .37      | .23 U    | .31      | .34      |
| NICKEL, mg/kg     | 6.1      | 6.1      | 6.6      | 8.7      |
| LEAD, mg/kg       | 190.     | 80.      | 230.     | 240.     |
| ANTIMONY, mg/kg   | 1.0 U    | 1.2 U    | 1.7      | 2.0      |
| SELENIUM, mg/kg   | 10. U    | 12 U     | 13. U    | 14. U    |
| TITANIUM, mg/kg   | N/A      | N/A      | N/A      | N/A      |
| THALLIUM, mg/kg   | 6.0 U    | 6.9 U    | 7.6 U    | 8.6 U    |
| VANADIUM, mg/kg   | 12       | 22       | 20.      | 17.      |
| ZINC, mg/kg       | 140.     | 170.     | 240.     | 230.     |
| CALCIUM, mg/kg    | 47000.   | 17000.   | 9300.    | 17000.   |
| MAGNESIUM, mg/kg  | 27000.   | 11000.   | 3900.    | 2600.    |
| SODIUM, mg/kg     | 110.     | 68.      | 51. U    | 57. U    |
| POTASSIUM, mg/kg  | 220.     | 490.     | 450.     | 700.     |

TABLE A-4 (continued)  
SUMMARY OF TOTAL METALS ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

*SS quad 29 SS quad 30 SS quad 31 SS quad 32*

| SAMPLES           | PK871023 | PK871030 | PK871031 | PK871032 |
|-------------------|----------|----------|----------|----------|
| SILVER, mg/kg     | .27 U    | .26 U    | .26 U    | .25 U    |
| ALUMINUM, mg/kg   | 6200.    | 7000.    | 5000.0   | 5600.0   |
| ARSENIC, mg/kg    | 2.7 J    | 4.1 J    | 13.0 U   | 13.0 U   |
| BARIUM, mg/kg     | 85.      | 76.      | 65.0     | 56.0     |
| BERYLLIUM, mg/kg  | .23      | .26      | .23      | .22      |
| CADMIUM, mg/kg    | 1.5      | .92      | 2.9      | .83      |
| COBALT, mg/kg     | 5.7      | 4.5      | 3.2      | 2.9      |
| CHROMIUM, mg/kg   | 15.      | 14.      | 14.0     | 11.0     |
| COPPER, mg/kg     | 270.     | 110.     | 68.0     | 60.0     |
| IRON, mg/kg       | 15000.   | 12000.   | 13000.0  | 10000.0  |
| MANGANESE, mg/kg  | 330.     | 370.     | 210.0    | 200.0    |
| MOLYBDENUM, mg/kg | .27 U    | .26 U    | .26 U    | .25 U    |
| NICKEL, mg/kg     | 7.4      | 5.3      | 11.0     | 4.4      |
| LEAD, mg/kg       | 96.      | 95.      | 130.0    | 72.0     |
| ANTIMONY, mg/kg   | 1.3 U    | 1.3 U    | 1.3 U    | 1.3 U    |
| SELENIUM, mg/kg   | 14. U    | 13. U    | 13.0 U   | 13.0 U   |
| TITANIUM, mg/kg   | N/A      | N/A      | N/A      | N/A      |
| THALLIUM, mg/kg   | 8.1 U    | 7.8 U    | 7.9 U    | 7.5 U    |
| VANADIUM, mg/kg   | 23.      | 23.      | 20.0     | 20.0     |
| ZINC, mg/kg       | 120.     | 90.      | 390.0    | 59.0     |
| CALCIUM, mg/kg    | 1800.    | 1300.    | 2100.0   | 1000.0   |
| MAGNESIUM, mg/kg  | 1200.    | 820.     | 600.0    | 660.0    |
| SODIUM, mg/kg     | 54. U    | 52 U     | 53.0 U   | 50.0 U   |
| POTASSIUM, mg/kg  | 770.     | 450.     | 320.0    | 370.0    |



Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES           | PK871036 | PK871041 | PK871042 | PK871043 |
|-------------------|----------|----------|----------|----------|
| SILVER, mg/kg     | .38 U    | .24 U    | .30 U    | .33 U    |
| ALUMINUM, mg/kg   | 8700.0   | 7200.0   | 4000.    | 6800.    |
| ARSENIC, mg/kg    | 3.9 J    | 10.0 J   | 15. U    | 3.5 J    |
| BARIUM, mg/kg     | 100.0    | 67.0     | 140.     | 130.     |
| BERYLLIUM, mg/kg  | .30      | .40      | .21      | .23      |
| CADMIUM, mg/kg    | 3.6      | .74      | 1.0      | 2.9      |
| COBALT, mg/kg     | 5.3      | 5.6      | 4.5      | 7.1      |
| CHROMIUM, mg/kg   | 24.0     | 21.0     | 7.9      | 13.      |
| COPPER, mg/kg     | 230.0    | 41.0     | 26.      | 61.      |
| IRON, mg/kg       | 15000.0  | 15000.0  | 7500.    | 14000.   |
| MANGANESE, mg/kg  | 210.0    | 170.0    | 720.     | 680.     |
| MOLYBDENUM, mg/kg | .38 U    | .24 U    | .30 U    | .33 U    |
| NICKEL, mg/kg     | 10.0     | 7.6      | 4.8      | 9.0      |
| LEAD, mg/kg       | 100.0    | 160.0    | 80.      | 150.     |
| ANTIMONY, mg/kg   | 1.9 U    | 1.3      | 3.0      | 1.6 U    |
| SELENIUM, mg/kg   | 19.0 U   | 12.0 U   | 15. U    | 16. U    |
| TITANIUM, mg/kg   | N/A      | N/A      | N/A      | N/A      |
| THALLIUM, mg/kg   | 12.0 U   | 7.2 U    | 9.0 U    | 9.8 U    |
| VANADIUM, mg/kg   | 21.0     | 26.0     | 14.      | 22       |
| ZINC, mg/kg       | 190.0    | 110.0    | 90.      | 460.     |
| CALCIUM, mg/kg    | 4100.0   | 5300.0   | 3200.    | 3800.    |
| MAGNESIUM, mg/kg  | 1900.0   | 2700.0   | 600.     | 1500.    |
| SODIUM, mg/kg     | 77.0 U   | 48.0 U   | 60. U    | 66. U    |
| POTASSIUM, mg/kg  | 720.0    | 470.0    | 390.     | 760.     |

TABLE A-4 (continued)  
SUMMARY OF TOTAL METALS ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

*Core 0-8*

*Core 8-16*

*Core 0-8*

*Core 8-12*

| SAMPLES           | PK871080 | PK871081 | PK871120 | PK871121 |
|-------------------|----------|----------|----------|----------|
| SILVER, mg/kg     | .26 U    | .24 U    | 1.4      | .24 U    |
| ALUMINUM, mg/kg   | 30000.   | 15000.0  | 5300.    | 8600.    |
| ARSENIC, mg/kg    | 5.3 J    | 12.0 U   | 8.7 J    | 4.2 J    |
| BARIUM, mg/kg     | 160.     | 93.0     | 200.     | 110.     |
| BERYLLIUM, mg/kg  | .94      | .42      | .20      | .35      |
| CADMIUM, mg/kg    | .24      | .12 U    | 16.      | .44      |
| COBALT, mg/kg     | 5.2      | 4.0      | 6.1      | 5.5      |
| CHROMIUM, mg/kg   | 22.      | 14.0     | 36.      | 13.      |
| COPPER, mg/kg     | 23.      | 12.0     | 3300.    | 93.      |
| IRON, mg/kg       | 34000.   | 16000.0  | 15000.   | 15000.   |
| MANGANESE, mg/kg  | 280.     | 140.0    | 240.     | 390.     |
| MOLYBDENUM, mg/kg | .26 U    | .24 U    | .96      | .24 U    |
| NICKEL, mg/kg     | 14.      | 11.0     | 13.      | 7.4      |
| LEAD, mg/kg       | 18.      | 7.4      | 1000.    | 160.     |
| ANTIMONY, mg/kg   | 1.3 U    | 1.2 U    | 7.3      | 1.2 U    |
| SELENIUM, mg/kg   | 13. U    | 12.0 U   | 13. U    | 12 U     |
| TITANIUM, mg/kg   | N/A      | N/A      | N/A      | N/A      |
| THALLIUM, mg/kg   | 7.8 U    | 7.3 U    | 7.7 U    | 7.2 U    |
| VANADIUM, mg/kg   | 52.      | 26.0     | 14.      | 25.      |
| ZINC, mg/kg       | 39.      | 26.0     | 1700.    | 60.      |
| CALCIUM, mg/kg    | 3200.    | 1800.0   | 10000.   | 1700.    |
| MAGNESIUM, mg/kg  | 2300.    | 2200.0   | 1700.    | 1000.    |
| SODIUM, mg/kg     | 110.     | 190.0    | 51. U    | 60.      |
| POTASSIUM, mg/kg  | 910.     | 540.0    | 620.     | 410.     |

TABLE A-4 (continued)  
SUMMARY OF TOTAL METALS ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

*Concrete dust*

*Concrete dust*

*Asphalt*

*dust*

| SAMPLES           | PK871300 | PK871301 | PK871302 | PK871400 |
|-------------------|----------|----------|----------|----------|
| SILVER, mg/kg     | .32      | .79      | 2.0      | 15.      |
| ALUMINUM, mg/kg   | 5000.    | 6300.    | 11000.   | 30000.   |
| ARSENIC, mg/kg    | 4.2 J    | 3.7 J    | 5.0 J    | 7.8 J    |
| BARIUM, mg/kg     | 60.      | 79.      | 49.      | 670.     |
| BERYLLIUM, mg/kg  | .20      | .20      | .10      | .22      |
| CADMIUM, mg/kg    | 1.9      | 2.3      | 1.6      | 44.      |
| COBALT, mg/kg     | 9.9      | 8.3      | 1.8      | 43.      |
| CHROMIUM, mg/kg   | 12.      | 14.      | 6.3      | 160.     |
| COPPER, mg/kg     | 93.      | 970.     | 1100.    | 20000.   |
| IRON, mg/kg       | 7800.    | 8900.    | 6800.    | 50000.   |
| MANGANESE, mg/kg  | 130.     | 130.     | 130.     | 720.     |
| MOLYBDENUM, mg/kg | .23      | .60      | .99      | 8.1      |
| NICKEL, mg/kg     | 4.9      | 11.      | 5.5      | 90.      |
| LEAD, mg/kg       | 30.      | 54.      | 98.      | 4200.    |
| ANTIMONY, mg/kg   | 1.0 U    | 1.0 U    | 1.0 U    | 7.2      |
| SELENIUM, mg/kg   | 10. U    | 10. U    | 10. U    | 10. U    |
| TITANIUM, mg/kg   | N/A      | N/A      | N/A      | N/A      |
| THALLIUM, mg/kg   | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| VANADIUM, mg/kg   | 13.      | 16.      | 5.4      | 31.      |
| ZINC, mg/kg       | 72       | 130.     | 130.     | 7500.    |
| CALCIUM, mg/kg    | 66000.   | 79000.   | 80000.   | 27000.   |
| MAGNESIUM, mg/kg  | 2900.    | 3700.    | 39000.   | 5800.    |
| SODIUM, mg/kg     | 130.     | 970.     | 72       | 15000.   |
| POTASSIUM, mg/kg  | 610.     | 1400.    | 180.     | 3100.    |

TABLE A-4 (continued)  
SUMMARY OF TOTAL METALS ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

*dist*

| SAMPLES           | PK871401 |
|-------------------|----------|
| SILVER, mg/kg     | 9.4      |
| ALUMINUM, mg/kg   | 11000.   |
| ARSENIC, mg/kg    | 2.1 J    |
| BARIUM, mg/kg     | 360.     |
| BERYLLIUM, mg/kg  | .100 U   |
| CADMIUM, mg/kg    | 48.      |
| COBALT, mg/kg     | 78.      |
| CHROMIUM, mg/kg   | 200.     |
| COPPER, mg/kg     | 11000.   |
| IRON, mg/kg       | 55000.   |
| MANGANESE, mg/kg  | 420.     |
| MOLYBDENUM, mg/kg | 11.      |
| NICKEL, mg/kg     | 67.      |
| LEAD, mg/kg       | 1600.    |
| ANTIMONY, mg/kg   | 35.      |
| SELENIUM, mg/kg   | 10. U    |
| TITANIUM, mg/kg   | N/A      |
| THALLIUM, mg/kg   | 6.0 U    |
| VANADIUM, mg/kg   | 17.      |
| ZINC, mg/kg       | 2500.    |
| CALCIUM, mg/kg    | 15000.   |
| MAGNESIUM, mg/kg  | 2700.    |
| SODIUM, mg/kg     | 3200.    |
| POTASSIUM, mg/kg  | 3000.    |

**TABLE A-3**  
**SUMMARY OF VOA ANALYSIS**  
**11-13 APRIL 1989**  
**SITE CHARACTERIZATION STUDY**

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES                          | PK871000 | PK871006 | PK871007 | PK871012 |
|----------------------------------|----------|----------|----------|----------|
| CHLOROMETHANE, mg/kg             | 480 U    | 24 U     | 24 U     | 24 U     |
| BROMOMETHANE, mg/kg              | 880 U    | 44 U     | 44 U     | 44 U     |
| VINYL CHLORIDE, mg/kg            | 560 U    | 28 U     | 28 U     | 28 U     |
| CHLOROETHANE, mg/kg              | 560 U    | 28 U     | 28 U     | 28 U     |
| METHYLENE CHLORIDE, mg/kg        | 400 U    | 20 U     | 20 U     | 20 U     |
| ACETONE, mg/kg                   | 400 U    | 20 U     | 20 U     | 20 U     |
| CARBON DISULFIDE, mg/kg          | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,1-DICHLOROETHENE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,1-DICHLOROETHANE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,2-DICHLOROETHENE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| CHLOROFORM, mg/kg                | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,2-DICHLOROETHANE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| 2-BUTANONE, mg/kg                | 1700 J   | 99 J     | 110 J    | 70 J     |
| 1,1,1-TRICHLOROETHANE, mg/kg     | 200 U    | 10 U     | 10 U     | 10 U     |
| CARBON TETRACHLORIDE, mg/kg      | 200 U    | 10 U     | 10 U     | 10 U     |
| VINYL ACETATE, mg/kg             | 400 U    | 20 U     | 20 U     | 20 U     |
| BROMODICHLOROMETHANE, mg/kg      | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,2-DICHLOROPROPANE, mg/kg       | 200 U    | 10 U     | 10 U     | 10 U     |
| CIS-1,3-DICHLOROPROPENE, mg/kg   | 200 U    | 10 U     | 10 U     | 10 U     |
| TRICHLOROETHENE, mg/kg           | 200 U    | 10 U     | 10 U     | 10 U     |
| BENZENE, mg/kg                   | 200 U    | 10 U     | 10 U     | 10 U     |
| DIBROMOCHLOROMETHANE, mg/kg      | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,1,2-TRICHLOROETHANE, mg/kg     | 200 U    | 10 U     | 10 U     | 10 U     |
| TRANS-1,3-DICHLOROPROPENE, mg/kg | 200 U    | 10 U     | 10 U     | 10 U     |
| BROMOFORM, mg/kg                 | 200 U    | 10 U     | 10 U     | 10 U     |
| 4-METHYL-2-PENTANONE, mg/kg      | 400 U    | 20 U     | 20 U     | 20 U     |
| 2-HEXANONE, mg/kg                | 400 U    | 20 U     | 20 U     | 20 U     |
| 1,1,2,2-TETRACHLOROETHANE, mg/kg | 200 U    | 10 U     | 10 U     | 10 U     |
| TETRACHLOROETHENE, mg/kg         | 200 U    | 10 U     | 10 U     | 10 U     |
| TOLUENE, mg/kg                   | 200 U    | 10 U     | 10 U     | 10 U     |
| CHLOROBENZENE, mg/kg             | 200 U    | 10 U     | 10 U     | 10 U     |
| ETHYL BENZENE, mg/kg             | 200 U    | 10 U     | 10 U     | 10 U     |
| STYRENE, mg/kg                   | 200 U    | 10 U     | 10 U     | 10 U     |
| TOTAL XYLENES, mg/kg             | 200 U    | 10 U     | 10 U     | 10 U     |

TABLE A-3 (continued)  
SUMMARY OF VOA ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES                          | PK871013 | PK871014 | PK871016 | PK871017 |
|----------------------------------|----------|----------|----------|----------|
| CHLOROMETHANE, mg/kg             | 480 U    | 14 U     | 14 U     | 14 U     |
| BROMOMETHANE, mg/kg              | 880 U    | 26 U     | 26 U     | 26 U     |
| VINYL CHLORIDE, mg/kg            | 560 U    | 17 U     | 17 U     | 17 U     |
| CHLOROETHANE, mg/kg              | 560 U    | 17 U     | 17 U     | 17 U     |
| METHYLENE CHLORIDE, mg/kg        | 400 U    | 12 U     | 12 U     | 12 U     |
| ACETONE, mg/kg                   | 400 U    | 12 U     | 12 U     | 12 U     |
| CARBON DISULFIDE, mg/kg          | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,1-DICHLOROETHENE, mg/kg        | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,1-DICHLOROETHANE, mg/kg        | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROETHENE, mg/kg        | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CHLOROFORM, mg/kg                | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROETHANE, mg/kg        | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 2-BUTANONE, mg/kg                | 400 U    | 75 J     | 12 U     | 83 J     |
| 1,1,1-TRICHLOROETHANE, mg/kg     | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CARBON TETRACHLORIDE, mg/kg      | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| VINYL ACETATE, mg/kg             | 400 U    | 12 U     | 12 U     | 12 U     |
| BROMODICHLOROMETHANE, mg/kg      | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROPROPANE, mg/kg       | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CIS-1,3-DICHLOROPROPENE, mg/kg   | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TRICHLOROETHENE, mg/kg           | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| BENZENE, mg/kg                   | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| DIBROMOCHLOROMETHANE, mg/kg      | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,1,2-TRICHLOROETHANE, mg/kg     | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TRANS-1,3-DICHLOROPROPENE, mg/kg | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| BROMOFORM, mg/kg                 | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 4-METHYL-2-PENTANONE, mg/kg      | 400 U    | 12 U     | 12 U     | 12 U     |
| 2-HEXANONE, mg/kg                | 400 U    | 12 U     | 12 U     | 12 U     |
| 1,1,2,2-TETRACHLOROETHANE, mg/kg | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TETRACHLOROETHENE, mg/kg         | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TOLUENE, mg/kg                   | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CHLOROBENZENE, mg/kg             | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| ETHYL BENZENE, mg/kg             | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| STYRENE, mg/kg                   | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TOTAL XYLENES, mg/kg             | 200 U    | 6.0 U    | 6.0 U    | 6.0 U    |

TABLE A-3 (continued)  
SUMMARY OF VOA ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES                          | PK871023 | PK871030 | PK871031 | PK871032 |
|----------------------------------|----------|----------|----------|----------|
| CHLOROMETHANE, mg/kg             | 480 U    | 24 U     | 24 U     | 24 U     |
| BROMOMETHANE, mg/kg              | 880 U    | 44 U     | 44 U     | 44 U     |
| VINYL CHLORIDE, mg/kg            | 560 U    | 28 U     | 28 U     | 28 U     |
| CHLOROETHANE, mg/kg              | 560 U    | 28 U     | 28 U     | 28 U     |
| METHYLENE CHLORIDE, mg/kg        | 400 U    | 20 U     | 20 U     | 20 U     |
| ACETONE, mg/kg                   | 400 U    | 20 U     | 20 U     | 20 U     |
| CARBON DISULFIDE, mg/kg          | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,1-DICHLOROETHENE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,1-DICHLOROETHANE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,2-DICHLOROETHENE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| CHLOROFORM, mg/kg                | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,2-DICHLOROETHANE, mg/kg        | 200 U    | 10 U     | 10 U     | 10 U     |
| 2-BUTANONE, mg/kg                | 400 U    | 110 J    | 20 U     | 80 J     |
| 1,1,1-TRICHLOROETHANE, mg/kg     | 200 U    | 10 U     | 10 U     | 10 U     |
| CARBON TETRACHLORIDE, mg/kg      | 200 U    | 10 U     | 10 U     | 10 U     |
| VINYL ACETATE, mg/kg             | 400 U    | 20 U     | 20 U     | 20 U     |
| BROMODICHLOROMETHANE, mg/kg      | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,2-DICHLOROPROPANE, mg/kg       | 200 U    | 10 U     | 10 U     | 10 U     |
| CIS-1,3-DICHLOROPROPENE, mg/kg   | 200 U    | 10 U     | 10 U     | 10 U     |
| TRICHLOROETHENE, mg/kg           | 200 U    | 10 U     | 10 U     | 10 U     |
| BENZENE, mg/kg                   | 200 U    | 10 U     | 10 U     | 10 U     |
| DIBROMOCHLOROMETHANE, mg/kg      | 200 U    | 10 U     | 10 U     | 10 U     |
| 1,1,2-TRICHLOROETHANE, mg/kg     | 200 U    | 10 U     | 10 U     | 10 U     |
| TRANS-1,3-DICHLOROPROPENE, mg/kg | 200 U    | 10 U     | 10 U     | 10 U     |
| BROMOFORM, mg/kg                 | 200 U    | 10 U     | 10 U     | 10 U     |
| 4-METHYL-2-PENTANONE, mg/kg      | 400 U    | 20 U     | 20 U     | 20 U     |
| 2-HEXANONE, mg/kg                | 400 U    | 20 U     | 20 U     | 20 U     |
| 1,1,2,2-TETRACHLOROETHANE, mg/kg | 200 U    | 10 U     | 10 U     | 10 U     |
| TETRACHLOROETHENE, mg/kg         | 200 U    | 10 U     | 10 U     | 10 U     |
| TOLUENE, mg/kg                   | 200 U    | 10 U     | 10 U     | 10 U     |
| CHLOROBENZENE, mg/kg             | 200 U    | 10 U     | 10 U     | 10 U     |
| ETHYL BENZENE, mg/kg             | 200 U    | 10 U     | 10 U     | 10 U     |
| STYRENE, mg/kg                   | 200 U    | 10 U     | 10 U     | 10 U     |
| TOTAL XYLENES, mg/kg             | 200 U    | 10 U     | 10 U     | 10 U     |

TABLE A-3 (continued)  
SUMMARY OF VOA ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES                          | PK871036 | PK871041 | PK871042 | PK871043 |
|----------------------------------|----------|----------|----------|----------|
| CHLOROMETHANE, mg/kg             | 24 U     | 480 U    | 14 U     | 14 U     |
| BROMOMETHANE, mg/kg              | 44 U     | 880 U    | 26 U     | 26 U     |
| VINYL CHLORIDE, mg/kg            | 28 U     | 560 U    | 17 U     | 17 U     |
| CHLOROETHANE, mg/kg              | 28 U     | 560 U    | 17 U     | 17 U     |
| METHYLENE CHLORIDE, mg/kg        | 20 U     | 400 U    | 12 U     | 12 U     |
| ACETONE, mg/kg                   | 20 U     | 400 U    | 12 U     | 12 U     |
| CARBON DISULFIDE, mg/kg          | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 1,1-DICHLOROETHENE, mg/kg        | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 1,1-DICHLOROETHANE, mg/kg        | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROETHENE, mg/kg        | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| CHLOROFORM, mg/kg                | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROETHANE, mg/kg        | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 2-BUTANONE, mg/kg                | 110 U    | 400 U    | 78 U     | 67 U     |
| 1,1,1-TRICHLOROETHANE, mg/kg     | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| CARBON TETRACHLORIDE, mg/kg      | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| VINYL ACETATE, mg/kg             | 20 U     | 400 U    | 12 U     | 12 U     |
| BROMODICHLOROMETHANE, mg/kg      | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROPROPANE, mg/kg       | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| CIS-1,3-DICHLOROPROPENE, mg/kg   | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| TRICHLOROETHENE, mg/kg           | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| BENZENE, mg/kg                   | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| DIBROMOCHLOROMETHANE, mg/kg      | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 1,1,2-TRICHLOROETHANE, mg/kg     | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| TRANS-1,3-DICHLOROPROPENE, mg/kg | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| BROMOFORM, mg/kg                 | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| 4-METHYL-2-PENTANONE, mg/kg      | 20 U     | 400 U    | 12 U     | 12 U     |
| 2-HEXANONE, mg/kg                | 20 U     | 400 U    | 12 U     | 12 U     |
| 1,1,2,2-TETRACHLOROETHANE, mg/kg | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| TETRACHLOROETHENE, mg/kg         | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| TOLUENE, mg/kg                   | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| CHLOROBENZENE, mg/kg             | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| ETHYL BENZENE, mg/kg             | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| STYRENE, mg/kg                   | 10 U     | 200 U    | 6.0 U    | 6.0 U    |
| TOTAL XYLENES, mg/kg             | 10 U     | 200 U    | 6.0 U    | 6.0 U    |



TABLE A-3 (continued)  
SUMMARY OF VOA ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES                          | PK871080 | PK871081 | PK871120 | PK871121 |
|----------------------------------|----------|----------|----------|----------|
| CHLOROMETHANE, mg/kg             | 14 U     | 14 U     | 14 U     | 14 U     |
| BROMOMETHANE, mg/kg              | 26 U     | 26 U     | 26 U     | 26 U     |
| VINYL CHLORIDE, mg/kg            | 17 U     | 17 U     | 17 U     | 17 U     |
| CHLOROETHANE, mg/kg              | 17 U     | 17 U     | 17 U     | 17 U     |
| METHYLENE CHLORIDE, mg/kg        | 12 U     | 12 U     | 12 U     | 12 U     |
| ACETONE, mg/kg                   | 12 U     | 12 U     | 12 U     | 12 U     |
| CARBON DISULFIDE, mg/kg          | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,1-DICHLOROETHENE, mg/kg        | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,1-DICHLOROETHANE, mg/kg        | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROETHENE, mg/kg        | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CHLOROFORM, mg/kg                | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROETHANE, mg/kg        | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 2-BUTANONE, mg/kg                | 12 U     | 99 J     | 65 J     | 81 J     |
| 1,1,1-TRICHLOROETHANE, mg/kg     | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CARBON TETRACHLORIDE, mg/kg      | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| VINYL ACETATE, mg/kg             | 12 U     | 12 U     | 12 U     | 12 U     |
| BROMODICHLOROMETHANE, mg/kg      | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,2-DICHLOROPROPANE, mg/kg       | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CIS-1,3-DICHLOROPROPENE, mg/kg   | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TRICHLOROETHENE, mg/kg           | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| BENZENE, mg/kg                   | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| DIBROMOCHLOROMETHANE, mg/kg      | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 1,1,2-TRICHLOROETHANE, mg/kg     | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TRANS-1,3-DICHLOROPROPENE, mg/kg | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| BROMOFORM, mg/kg                 | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| 4-METHYL-2-PENTANONE, mg/kg      | 12 U     | 12 U     | 12 U     | 12 U     |
| 2-HEXANONE, mg/kg                | 12 U     | 12 U     | 12 U     | 12 U     |
| 1,1,2,2-TETRACHLOROETHANE, mg/kg | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TETRACHLOROETHENE, mg/kg         | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TOLUENE, mg/kg                   | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| CHLOROBENZENE, mg/kg             | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| ETHYL BENZENE, mg/kg             | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| STYRENE, mg/kg                   | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |
| TOTAL XYLENES, mg/kg             | 6.0 U    | 6.0 U    | 6.0 U    | 6.0 U    |

TABLE A-3 (continued)  
SUMMARY OF VOA ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES                          | PK871300 | PK871301 | PK871302 | PK871400 |
|----------------------------------|----------|----------|----------|----------|
| CHLOROMETHANE, mg/kg             | 480 U    | 480 U    | 480 U    | 24 U     |
| BROMOMETHANE, mg/kg              | 880 U    | 880 U    | 880 U    | 44 U     |
| VINYL CHLORIDE, mg/kg            | 560 U    | 560 U    | 560 U    | 28 U     |
| CHLOROETHANE, mg/kg              | 560 U    | 560 U    | 560 U    | 28 U     |
| METHYLENE CHLORIDE, mg/kg        | 400 U    | 400 U    | 400 U    | 20 U     |
| ACETONE, mg/kg                   | 400 U    | 400 U    | 400 U    | 20 U     |
| CARBON DISULFIDE, mg/kg          | 200 U    | 200 U    | 200 U    | 10 U     |
| 1,1-DICHLOROETHENE, mg/kg        | 200 U    | 200 U    | 200 U    | 10 U     |
| 1,1-DICHLOROETHANE, mg/kg        | 200 U    | 200 U    | 200 U    | 10 U     |
| 1,2-DICHLOROETHENE, mg/kg        | 200 U    | 200 U    | 200 U    | 10 U     |
| CHLOROFORM, mg/kg                | 200 U    | 200 U    | 200 U    | 10 U     |
| 1,2-DICHLOROETHANE, mg/kg        | 200 U    | 200 U    | 200 U    | 10 U     |
| 2-BUTANONE, mg/kg                | 1700 U   | 400 U    | 1400 U   | 20 U     |
| 1,1,1-TRICHLOROETHANE, mg/kg     | 200 U    | 200 U    | 200 U    | 10 U     |
| CARBON TETRACHLORIDE, mg/kg      | 200 U    | 200 U    | 200 U    | 10 U     |
| VINYL ACETATE, mg/kg             | 400 U    | 400 U    | 400 U    | 20 U     |
| BROMODICHLOROMETHANE, mg/kg      | 200 U    | 200 U    | 200 U    | 10 U     |
| 1,2-DICHLOROPROPANE, mg/kg       | 200 U    | 200 U    | 200 U    | 10 U     |
| CIS-1,3-DICHLOROPROPENE, mg/kg   | 200 U    | 200 U    | 200 U    | 10 U     |
| TRICHLOROETHENE, mg/kg           | 200 U    | 200 U    | 200 U    | 10 U     |
| BENZENE, mg/kg                   | 200 U    | 200 U    | 200 U    | 10 U     |
| DIBROMOCHLOROMETHANE, mg/kg      | 200 U    | 200 U    | 200 U    | 10 U     |
| 1,1,2-TRICHLOROETHANE, mg/kg     | 200 U    | 200 U    | 200 U    | 10 U     |
| TRANS-1,3-DICHLOROPROPENE, mg/kg | 200 U    | 200 U    | 200 U    | 10 U     |
| BROMOFORM, mg/kg                 | 200 U    | 200 U    | 200 U    | 10 U     |
| 4-METHYL-2-PENTANONE, mg/kg      | 400 U    | 400 U    | 400 U    | 20 U     |
| 2-HEXANONE, mg/kg                | 400 U    | 400 U    | 400 U    | 20 U     |
| 1,1,2,2-TETRACHLOROETHANE, mg/kg | 200 U    | 200 U    | 200 U    | 10 U     |
| TETRACHLOROETHENE, mg/kg         | 200 U    | 200 U    | 200 U    | 10 U     |
| TOLUENE, mg/kg                   | 200 U    | 200 U    | 200 U    | 10 U     |
| CHLOROBENZENE, mg/kg             | 200 U    | 200 U    | 200 U    | 10 U     |
| ETHYL BENZENE, mg/kg             | 200 U    | 200 U    | 200 U    | 10 U     |
| STYRENE, mg/kg                   | 200 U    | 200 U    | 200 U    | 10 U     |
| TOTAL XYLENES, mg/kg             | 200 U    | 200 U    | 200 U    | 10 U     |

TABLE A-3 (continued)  
SUMMARY OF VOA ANALYSIS  
11-13 APRIL 1989  
SITE CHARACTERIZATION STUDY

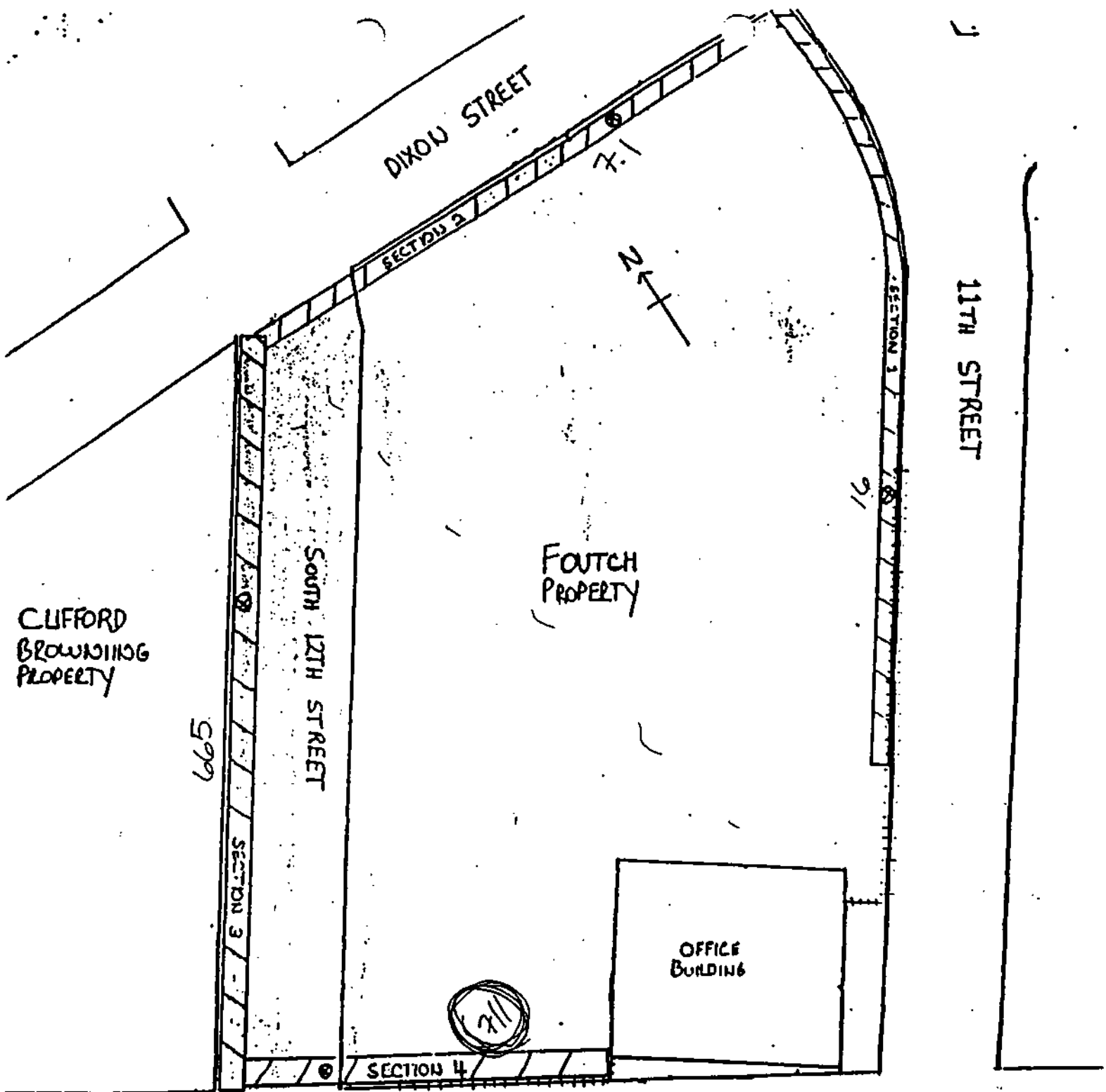
Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLES                          | PK871401 |
|----------------------------------|----------|
| CHLOROMETHANE, mg/kg             | 24 U     |
| BROMOMETHANE, mg/kg              | 44 U     |
| VINYL CHLORIDE, mg/kg            | 28 U     |
| CHLOROETHANE, mg/kg              | 28 U     |
| METHYLENE CHLORIDE, mg/kg        | 20 U     |
| ACETONE, mg/kg                   | 20 U     |
| CARBON DISULFIDE, mg/kg          | 10 U     |
| 1,1-DICHLOROETHENE, mg/kg        | 10 U     |
| 1,1-DICHLOROETHANE, mg/kg        | 10 U     |
| 1,2-DICHLOROETHENE, mg/kg        | 10 U     |
| CHLOROFORM, mg/kg                | 10 U     |
| 1,2-DICHLOROETHANE, mg/kg        | 10 U     |
| 2-BUTANONE, mg/kg                | 160 J    |
| 1,1,1-TRICHLOROETHANE, mg/kg     | 10 U     |
| CARBON TETRACHLORIDE, mg/kg      | 10 U     |
| VINYL ACETATE, mg/kg             | 20 U     |
| BROMODICHLOROMETHANE, mg/kg      | 10 U     |
| 1,2-DICHLOROPROPANE, mg/kg       | 10 U     |
| CIS-1,3-DICHLOROPROPENE, mg/kg   | 10 U     |
| TRICHLOROETHENE, mg/kg           | 10 U     |
| BENZENE, mg/kg                   | 10 U     |
| DIBROMOCHLOROMETHANE, mg/kg      | 10 U     |
| 1,1,2-TRICHLOROETHANE, mg/kg     | 10 U     |
| TRANS-1,3-DICHLOROPROPENE, mg/kg | 10 U     |
| BROMOFORM, mg/kg                 | 10 U     |
| 4-METHYL-2-PENTANONE, mg/kg      | 20 U     |
| 2-HEXANONE, mg/kg                | 20 U     |
| 1,1,2,2-TETRACHLOROETHANE, mg/kg | 10 U     |
| TETRACHLOROETHENE, mg/kg         | 10 U     |
| TOLUENE, mg/kg                   | 10 U     |
| CHLOROBENZENE, mg/kg             | 10 U     |
| ETHYL BENZENE, mg/kg             | 10 U     |
| STYRENE, mg/kg                   | 10 U     |
| TOTAL XYLENES, mg/kg             | 10 U     |

## **APPENDIX II**

**Bluff Electric Works Site, Poplar Bluff, MO**

**Sampling Results from the Perimeter Survey  
Conducted by EPA in September 1990**



# **KEY**

## **BLUFF ELECTRIC SITE**

+++++

EXISTING FENCE

⊙

BORE-HOLE SOIL-SAMPLE LOCATION

||||

SURFACE SOIL-SAMPLE SECTION

SCALE

⊙ BROWNING PROPERTY

● POPLAR BLUFF PROPERTY (CITY)

● FOUCH (BEW) PROPERTY

**MEMORANDUM**

**TO:** Bruce Morrison, EPA/OSC  
**FROM:** Darrell Messbarger, E & E/TATH  
**DATE:** November 1, 1990  
**SUBJECT:** Data Review Memo for Bluff Electric Works Analyses  
  
PAN# EM00723AAA  
TDD# T07-9010-020

This is the report on the data review performed on the data package received by the Region VII TAT from Environmental Industrial Research Associates, of St. Rose, Louisiana covering the PCB analyses for the Bluff Electric Works sampling.

**Holding Times** - All holding times were met with the exception of the Matrix Spike and Matrix Spike Duplicate data which was reran at the request of the Analytical Services Group of TAT. The lack of proper holding time for these samples does not adversely affect the quality of the data.

**Instrument performance** - Separation of peaks used for quantitation are within the data validation guidelines - "Laboratory Data Validation Functional Guidelines for Evaluating Organic Analyses" EPA Sample Management Office, February 1, 1988. Surrogate Retention Time Shifts are within the Guideline specification of 1.5 % for wide-bore capillary columns.

**Initial and Continuing Calibration Verification** - Arochlor 1260 is the only PCB to be reported. Proper numbers of initial calibration samples were analyzed. Continuing calibrations were ran periodically and within the Guideline limits. The XD (percent difference) for the calibration factors are within acceptable limits for both columns. The % RSD's (Relative Standard Deviation) for both columns exceeded the 10% maximum. All associated data is J-coded.

**Blank Data** - All blank data is acceptable.

**Compound Identification** - All compounds identified by this data package have been verified by data review for each sample on both the Quantitation and Confirmation Column chromatographs.

**Matrix and Matrix Spike Duplicates** - Because of the high levels of PCB contaminant in the sample chosen for use of the MS and MSD, the spiking solution levels are not detectable due to the high level of dilution required to bring the runs into a quantifiable level. This will not effect the quality of the data.

**Summary** - This data appears to be of good quality . Although the values reported for Arochlor 1260 are qualified (J-coded), it is by only the smallest of margins that the % RSD's failed. The 10 % limit is exceeded by 0.7% on the quantitation column and 2% on the confirmation column. If the data is to be considered an approximate value, it is the reviewer's contention that it is a very close approximation of the true value.

The data while good, was presented in a rather poor data package. Many questions arose concerning the data that were subsequently answered, but the data review process could have been greatly simplified if EIRA had taken greater pains in answering problems in the Case Narrative and producing the data package as a whole.

# ANALYSIS TYPE: PESTICIDES

TITLE: BLUFF ELECTRIC WORKS PCB'S

LAB: EIRA

SAMPLE PREP: \_\_\_\_\_

REVIEW LEVEL: 2

MATRIX: SEDIMENT

METHOD: 608

REVIEWER: \_\_\_\_\_

DATA FILE : BE1

UNITS: UG/KG

CASE:

DATE: 11/01/90

| SAMPLES            | CLXDS001 | CLXDS002 | CLXDS003 | CLXDS004 |
|--------------------|----------|----------|----------|----------|
| ALPHA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| BETA-BHC           | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| DELTA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| GAMMA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR         | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| ALDRIN             | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR EPOXIDE | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| ENDOSULFAN I       | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| DIELDRIN           | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDE           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN             | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN II      | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDD           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN ALDEHYDE    | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN SULFATE | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDT           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN KETONE      | 16 U     | 16 U     | 16 U     | 16 U     |
| METHOXYCHLOR       | 80 U     | 80 U     | 80 U     | 80 U     |
| ALPHA-CHLORDANE    | 80 U     | 80 U     | 80 U     | 80 U     |
| GAMMA-CHLORDANE    | 80 U     | 80 U     | 80 U     | 80 U     |
| TOXAPHENE          | 160 U    | 160 U    | 160 U    | 160 U    |
| AROCLOR-1016       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1221       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1232       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1242       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1248       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1254       | 160 U    | 160 U    | 160 U    | 160 U    |
| AROCLOR-1260       | 12000 J  | 14000 J  | 15000 J  | 4100 J   |



# ANALYSIS TYPE: PESTICIDES

TITLE: BLUFF ELECTRIC WORKS PCB'S

LAB: EIRA

SAMPLE PREP: \_\_\_\_\_

REVIEW LEVEL: 2

ANALYST/ENTRY: DDM

MATRIX: SEDIMENT

METHOD: 608

REVIEWER: \_\_\_\_\_

DATA FILE : BE1

UNITS: UG/KG

CASE:

DATE: 11/01/90

| SAMPLES            | CLXDS005 | CLXDS006 | CLXDS007  | CLXDS008  |
|--------------------|----------|----------|-----------|-----------|
| ALPHA-BHC          | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| BETA-BHC           | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| DELTA-BHC          | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| GAMMA-BHC          | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| HEPTACHLOR         | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| ALDRIN             | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| HEPTACHLOR EPOXIDE | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| ENDOSULFAN I       | 8.0 U    | 8.0 U    | 8.0 U     | 8.0 U     |
| DIELDRIN           | 16 U     | 16 U     | 16 U      | 16 U      |
| 4,4'-DDE           | 16 U     | 16 U     | 16 U      | 16 U      |
| ENDRIN             | 16 U     | 16 U     | 16 U      | 16 U      |
| ENDOSULFAN II      | 16 U     | 16 U     | 16 U      | 16 U      |
| 4,4'-DDD           | 16 U     | 16 U     | 16 U      | 16 U      |
| ENDRIN ALDEHYDE    | 16 U     | 16 U     | 16 U      | 16 U      |
| ENDOSULFAN SULFATE | 16 U     | 16 U     | 16 U      | 16 U      |
| 4,4'-DDT           | 16 U     | 16 U     | 16 U      | 16 U      |
| ENDRIN KETONE      | 16 U     | 16 U     | 16 U      | 16 U      |
| METHOXYCHLOR       | 80 U     | 80 U     | 80 U      | 80 U      |
| ALPHA-CHLORDANE    | 80 U     | 80 U     | 80 U      | 80 U      |
| GAMMA-CHLORDANE    | 80 U     | 80 U     | 80 U      | 80 U      |
| TOXAPHENE          | 160 U    | 160 U    | 160 U     | 160 U     |
| AROCLOR-1016       | 80 U     | 80 U     | 80 U      | 80 U      |
| AROCLOR-1221       | 80 U     | 80 U     | 80 U      | 80 U      |
| AROCLOR-1232       | 80 U     | 80 U     | 80 U      | 80 U      |
| AROCLOR-1242       | 80 U     | 80 U     | 80 U      | 80 U      |
| AROCLOR-1248       | 80 U     | 80 U     | 80 U      | 80 U      |
| AROCLOR-1254       | 160 U    | 160 U    | 160 U     | 160 U     |
| AROCLOR-1260       | 6300 J   | 3600 J   | 540,000 J | 480,000 J |

## ANALYSIS TYPE: PESTICIDES

TITLE: BLUFF ELECTRIC WORKS PCB'S

MATRIX: SEDIMENT

UNITS: UG/KG

LAB: EIRA

METHOD: 608

CASE:

SAMPLE PREP: \_\_\_\_\_

ANALYST/ENTRY: DDM REVIEWER: \_\_\_\_\_

DATE: 11/01/90

REVIEW LEVEL: 2

DATA FILE : BEL

| SAMPLES            | CLXDS008D | CLXDS009 | CLXDS010 | CLXDS011 |
|--------------------|-----------|----------|----------|----------|
| ALPHA-BHC          | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| BETA-BHC           | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| DELTA-BHC          | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| GAMMA-BHC          | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR         | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| ALDRIN             | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR EPOXIDE | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| ENDOSULFAN I       | 8.0 U     | 8.0 U    | 8.0 U    | 8.0 U    |
| DIELDRIN           | 16 U      | 16 U     | 16 U     | 16 U     |
| 4,4'-DDE           | 16 U      | 16 U     | 16 U     | 16 U     |
| ENDRIN             | 16 U      | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN II      | 16 U      | 16 U     | 16 U     | 16 U     |
| 4,4'-DDD           | 16 U      | 16 U     | 16 U     | 16 U     |
| ENDRIN ALDEHYDE    | 16 U      | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN SULFATE | 16 U      | 16 U     | 16 U     | 16 U     |
| 4,4'-DDT           | 16 U      | 16 U     | 16 U     | 16 U     |
| ENDRIN KETONE      | 16 U      | 16 U     | 16 U     | 16 U     |
| METHOXYCHLOR       | 80 U      | 80 U     | 80 U     | 80 U     |
| ALPHA-CHLORDANE    | 80 U      | 80 U     | 80 U     | 80 U     |
| GAMMA-CHLORDANE    | 80 U      | 80 U     | 80 U     | 80 U     |
| TOXAPHENE          | 160 U     | 160 U    | 160 U    | 160 U    |
| AROCLOR-1016       | 80 U      | 80 U     | 80 U     | 80 U     |
| AROCLOR-1221       | 80 U      | 80 U     | 80 U     | 80 U     |
| AROCLOR-1232       | 80 U      | 80 U     | 80 U     | 80 U     |
| AROCLOR-1242       | 80 U      | 80 U     | 80 U     | 80 U     |
| AROCLOR-1248       | 80 U      | 80 U     | 80 U     | 80 U     |
| AROCLOR-1254       | 160 U     | 160 U    | 160 U    | 160 U    |
| AROCLOR-1260       | 610000 J  | 660000 J | 670000 J | 560000 J |

## ANALYSIS TYPE: PESTICIDES

TITLE: BLUFF ELECTRIC WORKS PCB'S

MATRIX: SEDIMENT

UNITS: UG/KG

LAB: EIRA

METHOD: 608

CASE:

SAMPLE PREP: \_\_\_\_\_ ANALYST/ENTRY: DDM

REVIEWER: \_\_\_\_\_

DATE: 11/01/90

REVIEW LEVEL: 2

DATA FILE : BEI

| SAMPLES            | CLXDS012 | CLXDS013 | CLXDS017 | CLXDS018 |
|--------------------|----------|----------|----------|----------|
| ALPHA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| BETA-BHC           | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| DELTA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| GAMMA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR         | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| ALDRIN             | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR EPOXIDE | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| ENDOSULFAN I       | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| DIELDRIN           | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDE           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN             | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN II      | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDD           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN ALDEHYDE    | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN SULFATE | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDT           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN KETONE      | 16 U     | 16 U     | 16 U     | 16 U     |
| METHOXYCHLOR       | 80 U     | 80 U     | 80 U     | 80 U     |
| ALPHA-CHLORDANE    | 80 U     | 80 U     | 80 U     | 80 U     |
| GAMMA-CHLORDANE    | 80 U     | 80 U     | 80 U     | 80 U     |
| TOXAPHENE          | 160 U    | 160 U    | 160 U    | 160 U    |
| AROCLOR-1016       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1221       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1232       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1242       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1248       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1254       | 160 U    | 160 U    | 160 U    | 160 U    |
| AROCLOR-1260       | 530000 J | 160 U    | 160 U    | 160 U    |

# ANALYSIS TYPE: PESTICIDES

TITLE: BLUFF ELECTRIC WORKS PCB'S

MATRIX: SEDIMENT

UNITS: UG/KG

LAB: EIRA

METHOD: 608

CASE:

SAMPLE PREP: ANALYST/ENTRY: DDM

REVIEWER:

DATE: 11/01/90

REVIEW LEVEL: 2

DATA FILE : BE1

| SAMPLES            | CLXDS019 | CLXDS020 | CLXDS021 | CLXDS022 |
|--------------------|----------|----------|----------|----------|
| ALPHA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| BETA-BHC           | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| DELTA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| GAMMA-BHC          | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR         | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| ALDRIN             | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| HEPTACHLOR EPOXIDE | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| ENDOSULFAN I       | 8.0 U    | 8.0 U    | 8.0 U    | 8.0 U    |
| DIELDRIN           | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDE           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN             | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN II      | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDD           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN ALDEHYDE    | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDOSULFAN SULFATE | 16 U     | 16 U     | 16 U     | 16 U     |
| 4,4'-DDT           | 16 U     | 16 U     | 16 U     | 16 U     |
| ENDRIN KETONE      | 16 U     | 16 U     | 16 U     | 16 U     |
| METHOXYCHLOR       | 80 U     | 80 U     | 80 U     | 80 U     |
| ALPHA-CHLORDANE    | 80 U     | 80 U     | 80 U     | 80 U     |
| GAMMA-CHLORDANE    | 80 U     | 80 U     | 80 U     | 80 U     |
| TOXAPHENE          | 160 U    | 160 U    | 160 U    | 160 U    |
| AROCLOR-1016       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1221       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1232       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1242       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1248       | 80 U     | 80 U     | 80 U     | 80 U     |
| AROCLOR-1254       | 160 U    | 160 U    | 160 U    | 160 U    |
| AROCLOR-1260       | 160 U    | 1900 J   | 9800 J   | 160 U    |

### **APPENDIX III**

**Bluff Electric Works Site, Poplar Bluff, MO**

**Sampling Results from the Site Characterization  
Conducted by The Earth Technology Corporation in September 1991**

12th STREET  
RIGHT-OF-WAY

DIXON STREET

HIGHWAY 53 RIGHT-OF-WAY LINE

MISSOURI HIGHWAY 53

HOUSE

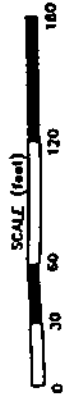
CONCRETE  
PAD

BLUFF ELECTRIC  
WORKS BLDG.



**LEGEND**

- DITCH CENTER-LINE
- ~ VEGETATED AREA
- SURFACE SOIL SAMPLES  
(0-6 INCHES)
- ▲ DRAINAGE DITCH SAMPLES
- ⊙ SURFACE AND SUBSURFACE  
SOIL SAMPLES

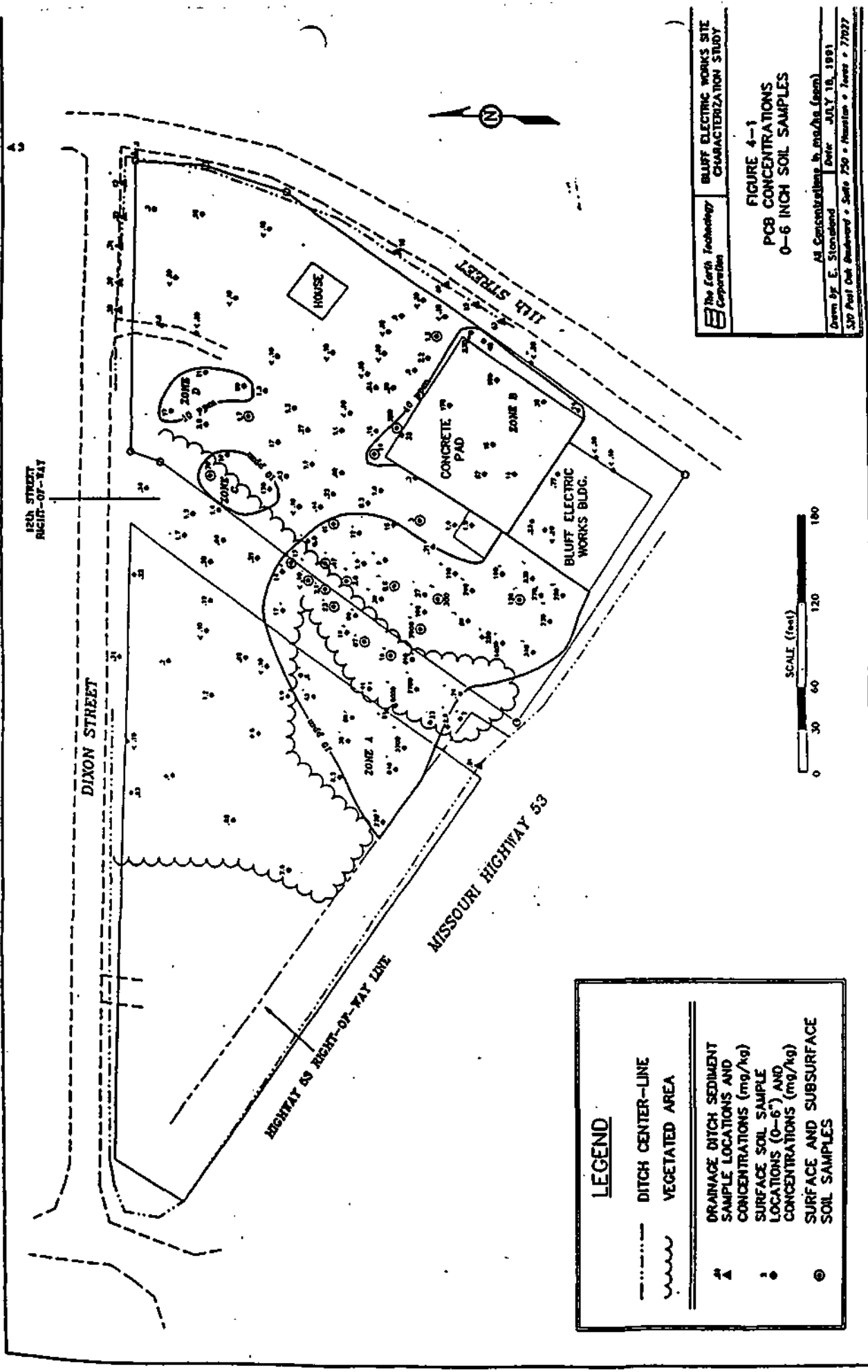


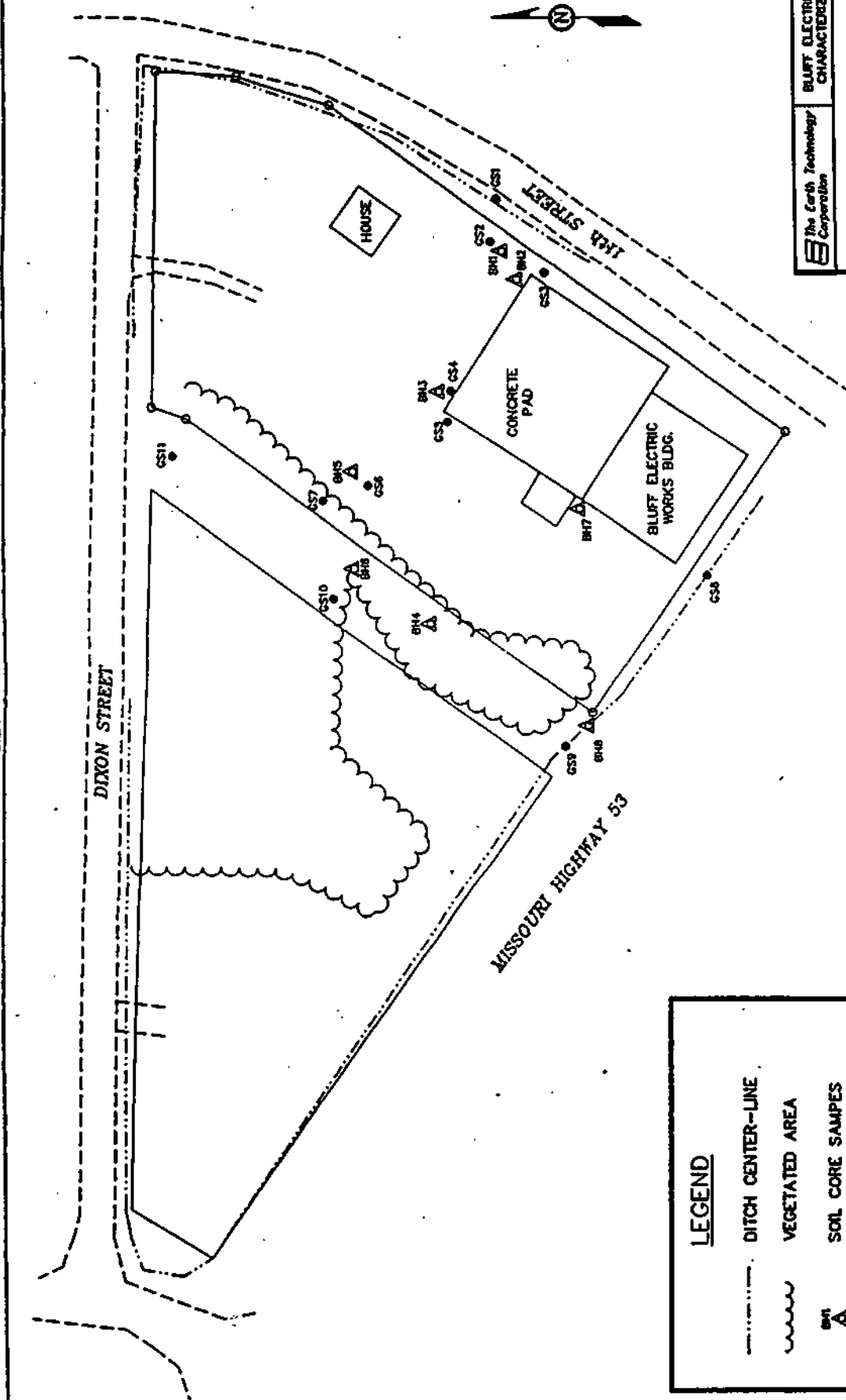
The Earth Technology Corporation

BLUFF ELECTRIC WORKS SITE  
CHARACTERIZATION STUDY

**FIGURE 2-1**  
**SAMPLING GRID AND SAMPLE**  
**LOCATIONS**

|                                                              |                     |
|--------------------------------------------------------------|---------------------|
| Drawn By: E. Stenlund                                        | Date: JULY 18, 1991 |
| 330 Peck Oak Boulevard • Suite 750 • Houston • Texas • 77027 |                     |



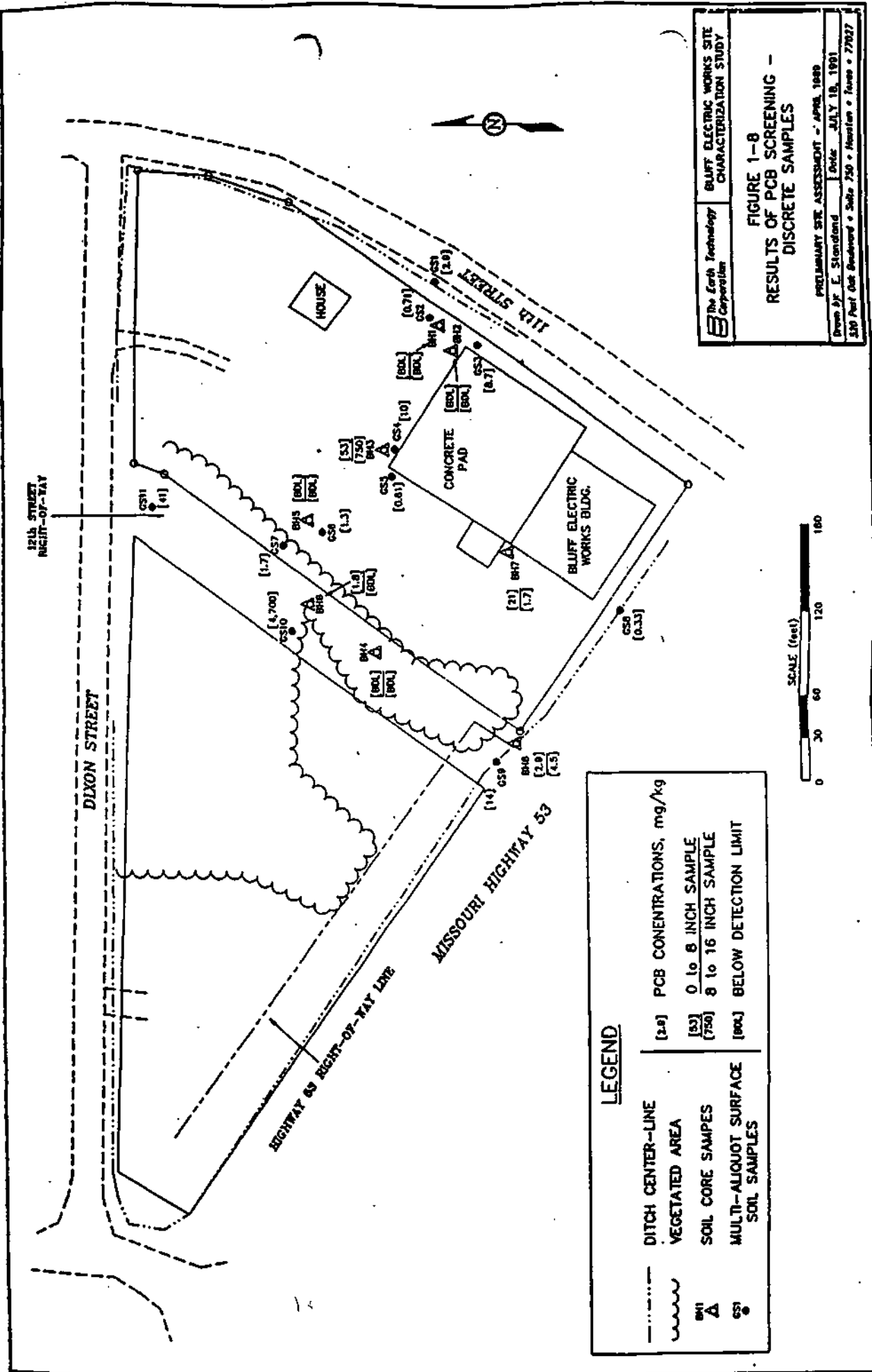


**LEGEND**

- DITCH CENTER-LINE
- ~~~~~ VEGETATED AREA
- BH Δ SOIL CORE SAMPLES
- CS ● MULTI-ALIQUOT SURFACE SOIL SAMPLES

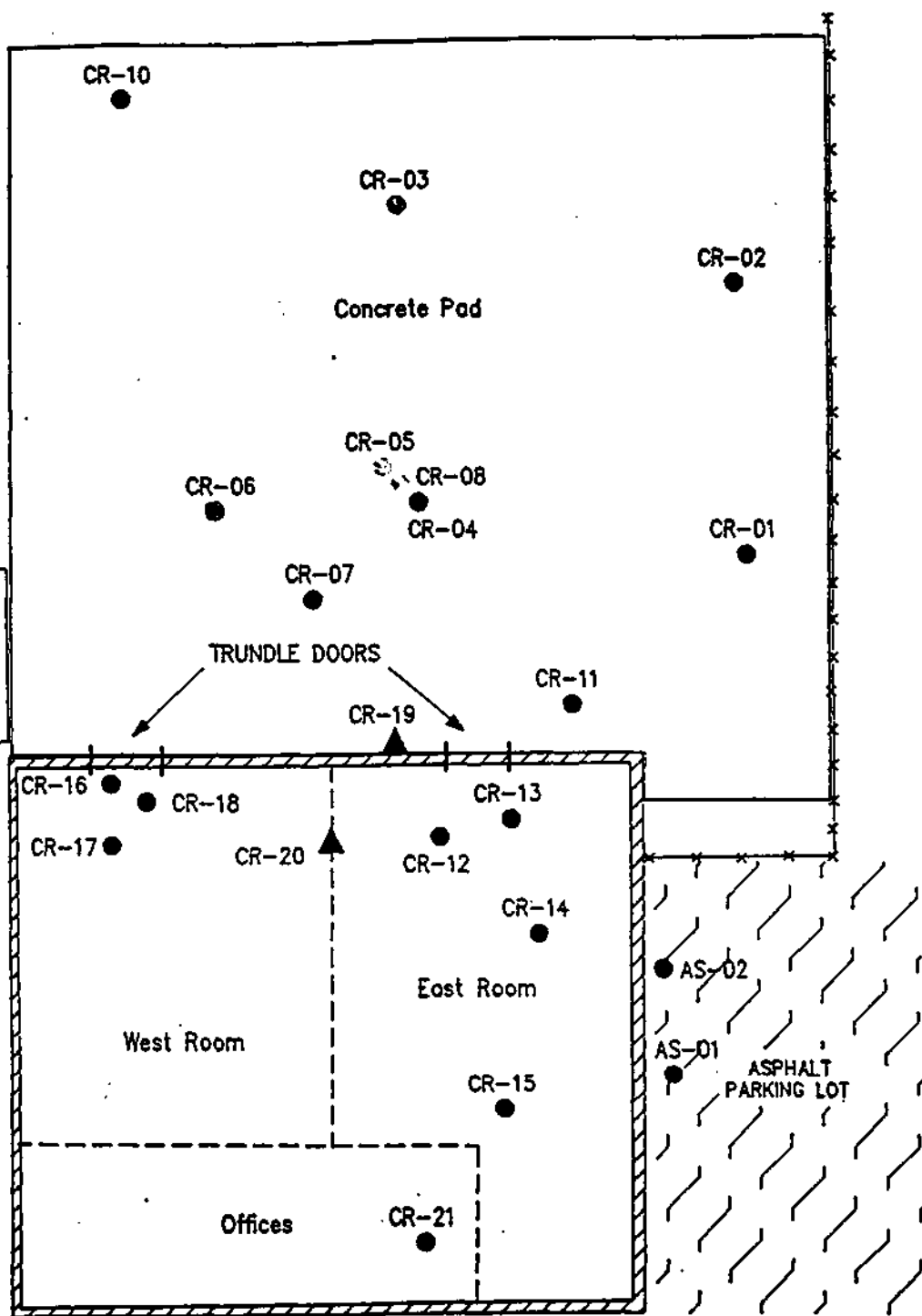
|                                                                     |                                                                               |
|---------------------------------------------------------------------|-------------------------------------------------------------------------------|
|                                                                     | BLUFF ELECTRIC WORKS SITE CHARACTERIZATION STUDY                              |
|                                                                     | <p><b>FIGURE 1-6</b><br/><b>U.S. EPA DISCRETE SOIL SAMPLING LOCATIONS</b></p> |
| <p>PRELIMINARY SITE ASSESSMENT - APRIL 1989</p>                     |                                                                               |
| <p>Drawn by: E. Stencland</p>                                       | <p>Date: JULY 10, 1993</p>                                                    |
| <p>530 Post Oak Boulevard • Suite 750 • Houston • Texas • 77057</p> |                                                                               |







● CR-09  
Kennels



6' Chain Link Fence

APPROXIMATE SCALE: 1"=30'

- ASPHALT SAMPLES
- CONCRETE SAMPLES
- ▲ WALL SAMPLES

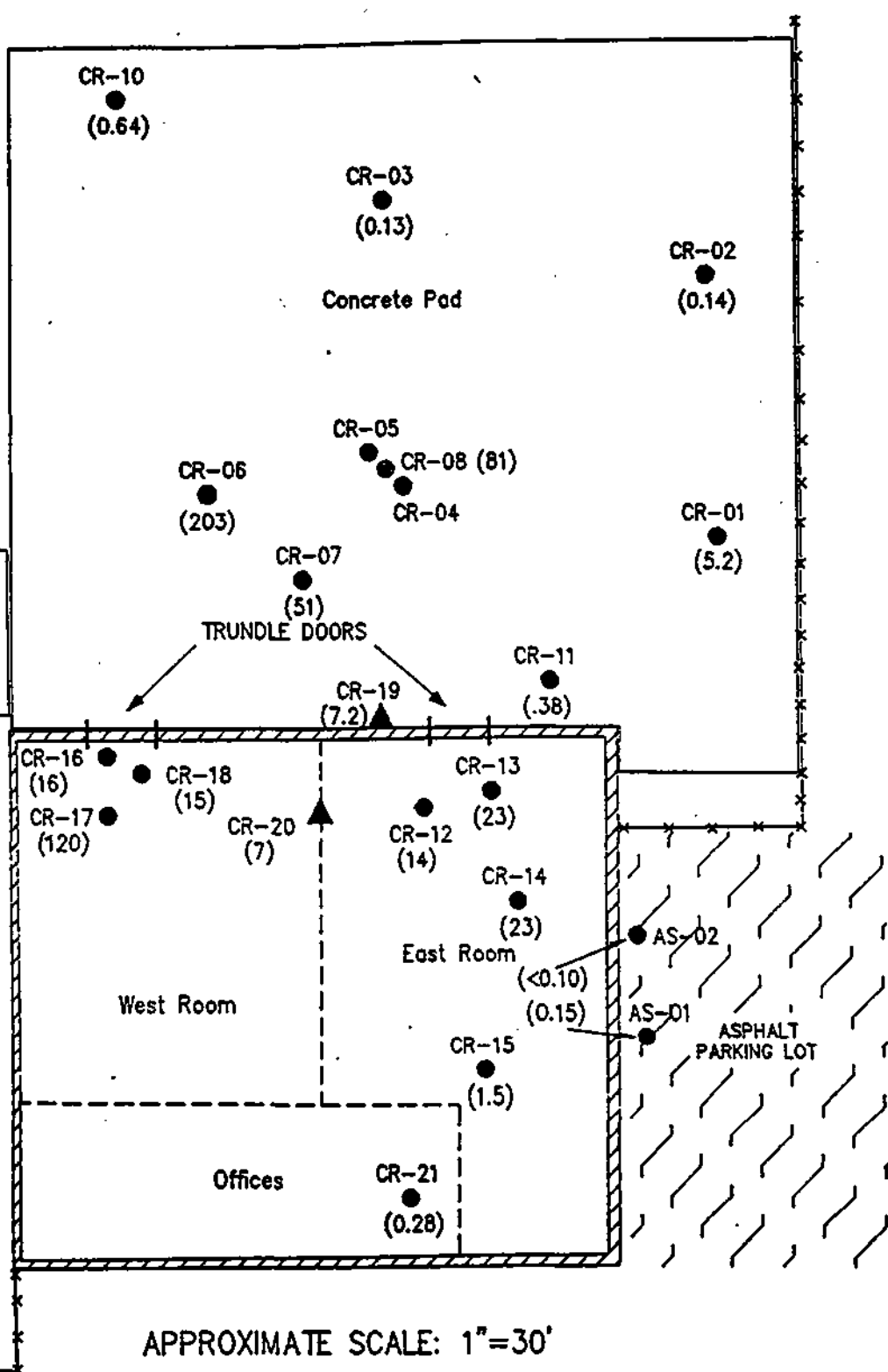
The Earth Technology Corporation

BLUFF ELECTRIC WORKS SITE  
CHARACTERIZATION STUDY

FIGURE 2-2  
APPROXIMATE LOCATIONS  
CONCRETE/ASPHALT SAMPLES



● CR-09  
(0.44)  
Kennels



APPROXIMATE SCALE: 1"=30'

6' Chain Link Fence

- ASPHALT SAMPLES
- CONCRETE SAMPLES
- ▲ WALL SAMPLES

The Earth Technology Corporation

BLUFF ELECTRIC WORKS SITE  
CHARACTERIZATION STUDY

FIGURE 4-2  
PCB CONCENTRATIONS,  
CONCRETE/ASPHALT SAMPLES

(PCB CONCENTRATIONS IN PARTS PER MILLION - PPM)

520 Post Oak Boulevard • Suite 750 • Houston • Texas • 77027

**TABLE B-1  
PCB LABORATORY RESULTS  
SITE CHARACTERIZATION STUDY**

**Bluff Electric Works  
Poplar Bluff, Missouri**

| SAMPLE NUMBER       | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|---------------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-SS-A03-01       | 0 - 6'            | 220                      | 12-Jun-91       | 15-Jun-91         | 08-Jul-91        |
| BEW-SS-A04-01       | 0 - 2'            | 3200                     | 12-Jun-91       | 15-Jun-91         | 08-Jul-91        |
| BEW-SS-A04-02       | 0 - 2'            | 540                      | 12-Jun-91       | 15-Jun-91         | 07-Jul-91        |
| BEW-SS-A05-01       | 0 - 6'            | 0.74                     | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-A05-01A      | 0 - 6'            | 3.2                      | 08-Jun-91       | 13-Jun-91         | 26-Jun-91        |
| BEW-SS-A05-02       | 0 - 4'            | 2.6                      | 08-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-A05-03       | 0 - 6'            | 23                       | 08-Jun-91       | 18-Jun-91         | 08-Jul-91        |
| BEW-SS-A06-01       | 0 - 6'            | 1400                     | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-A06-02       | 4 - 8'            | 250                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-A06-03       | 4 - 8'            | 340                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-A07-01       | 0 - 6'            | 330                      | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-A07-02       | 3 - 9'            | 230                      | 06-Jun-91       | 07-Jun-91         | 18-Jun-91        |
| BEW-SS-A07-03-01    | 0 - 6'            | 120                      | 06-Jun-91       | 07-Jun-91         | 18-Jun-91        |
| BEW-SS-A07-03-02    | 11 - 13'          | 13                       | 06-Jun-91       | 07-Jun-91         | 19-Jun-91        |
| BEW-SS-A07-03-03    | 22 - 27'          | NA                       |                 |                   |                  |
| BEW-SS-A07-04       | 0 - 6'            | 250                      | 06-Jun-91       | 07-Jun-91         | 11-Jun-91        |
| BEW-SS-A07-05       | 1 - 6'            | 270                      | 06-Jun-91       | 07-Jun-91         | 18-Jun-91        |
| BEW-SS-A10-01       | 0 - 6'            | 14                       | 08-Jun-91       | 13-Jun-91         | 03-Jul-91        |
| BEW-SS-B02-01       | 0 - 6'            | 7.6                      | 12-Jun-91       | 15-Jun-91         | 04-Jul-91        |
| BEW-SS-B03-01       | 0 - 4'            | 8.2                      | 12-Jun-91       | 15-Jun-91         | 04-Jul-91        |
| BEW-SS-B04-01       | 0 - 4'            | 51                       | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-B04-02       | 0 - 6'            | 30                       | 12-Jun-91       | 15-Jun-91         | 07-Jul-91        |
| BEW-SS-B04-03       | 0 - 4'            | 50                       | 12-Jun-91       | 15-Jun-91         | 04-Jul-91        |
| BEW-SS-B05-01       | 0 - 6'            | 610                      | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-B05-02       | 0 - 2'            | 2700                     | 09-Jun-91       | 11-Jun-91         | 05-Jul-91        |
| BEW-SS-B05-03-01    | 0 - 6'            | 18                       | 09-Jun-91       | 11-Jun-91         | 02-Jul-91        |
| BEW-SS-B05-03-01DUP | 0 - 6'            | 16                       | 09-Jun-91       | 11-Jun-91         | 02-Jul-91        |
| BEW-SS-B05-03-02    | 10 - 14'          | 16                       | 09-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-B05-03-03    | 22 - 26'          | 2.1                      | 09-Jun-91       | 18-Jun-91         | 06-Jul-91        |

9594.34 n = 21

249577

TABLE B-1 (continued)  
PCB LABORATORY RESULTS  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLE NUMBER       | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|---------------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-SS-B05-04       | 0 - 6"            | 5000                     | 09-Jun-91       | 12-Jun-91         | 07-Jul-91        |
| BEW-SS-B05-05       | 0 - 6"            | 61                       | 09-Jun-91       | 12-Jun-91         | 27-Jun-91        |
| BEW-SS-B06-01       | 0 - 6"            | 27                       | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-B06-02-01    | 0 - 6"            | 7900                     | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-B06-02-02    | 10 - 14"          | 640                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-B06-02-03    | 22 - 26"          | 8700                     | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-B06-03-01    | 0 - 6"            | 300                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-B06-03-02    | 10 - 14"          | 350                      | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-B06-03-03    | 22 - 24"          | 34                       | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-B06-04-01    | 0 - 6"            | 190                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-B06-04-01DUP | 0 - 6"            | 190                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-B06-04-02    | 10 - 12"          | 250                      | 07-Jun-91       | 10-Jun-91         | 24-Jun-91        |
| BEW-SS-B06-05       | 0 - 6"            | 56                       | 07-Jun-91       | 11-Jun-91         | 05-Jul-91        |
| BEW-SS-B07-01       | 5 - 10"           | 110                      | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-B07-02       | 0 - 6"            | 290                      | 06-Jun-91       | 07-Jun-91         | 17-Jun-91        |
| BEW-SS-B07-02DUP    | 0 - 6"            | 290                      | 06-Jun-91       | 07-Jun-91         | 18-Jun-91        |
| BEW-SS-B07-03       | 0 - 6"            | 160                      | 06-Jun-91       | 07-Jun-91         | 18-Jun-91        |
| BEW-SS-C02-01       | 0 - 6"            | 0.85                     | 12-Jun-91       | 15-Jun-91         | 01-Jul-91        |
| BEW-SS-C03-01       | 0 - 6"            | 6.5                      | 12-Jun-91       | 14-Jun-91         | 28-Jun-91        |
| BEW-SS-C04-01       | 0 - 6"            | 43                       | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-C04-02       | 0 - 4"            | 4.9                      | 12-Jun-91       | 15-Jun-91         | 07-Jul-91        |
| BEW-SS-C04-03       | 0 - 6"            | 0.50                     | 12-Jun-91       | 15-Jun-91         | 05-Jul-91        |
| BEW-SS-C05-01       | 0 - 6"            | 19                       | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-C05-02-01    | 0 - 6"            | 23                       | 09-Jun-91       | 12-Jun-91         | 02-Jul-91        |
| BEW-SS-C05-02-01DUP | 0 - 6"            | 28                       | 09-Jun-91       | 12-Jun-91         | 26-Jun-91        |
| BEW-SS-C05-02-02    | 10 - 14"          | 1.1                      | 09-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-C05-02-03    | 22 - 26"          | 1.5                      | 09-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-C05-03-01    | 0 - 6"            | 57                       | 09-Jun-91       | 12-Jun-91         | 27-Jun-91        |
| BEW-SS-C05-03-01DUP | 0 - 6"            | 76                       | 09-Jun-91       | 12-Jun-91         | 27-Jun-91        |

14483.75 n = 19

**TABLE B-1 (continued)**  
**PCB LABORATORY RESULTS**  
**SITE CHARACTERIZATION STUDY**

Bluff Electric Works  
 Poplar Bluff, Missouri

| SAMPLE NUMBER       | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|---------------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-SS-C05-03-02    | 10 - 14'          | 0.61                     | 09-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-C05-03-03    | 22 - 26'          | 18                       | 09-Jun-91       | 18-Jun-91         | 08-Jul-91        |
| BEW-SS-C05-04       | 4 - 10'           | 90                       | 10-Jun-91       | 11-Jun-91         | 05-Jul-91        |
| BEW-SS-C06-01       | 0 - 6'            | 1.9                      | 05-Jun-91       | 06-Jun-91         | 06-Jun-91        |
| BEW-SS-C06-02-01    | 6 - 12'           | 5.5                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-C06-02-01DUP | 6 - 12'           | 2.1                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-C06-02-02    | 13 - 17'          | 0.30                     | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-C06-02-03    | 20 - 24'          | 0.11                     | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-C06-03       | 0 - 6'            | 39                       | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-C06-04       | 8 - 12'           | 9.0                      | 08-Jun-91       | 13-Jun-91         | 26-Jun-91        |
| BEW-SS-C06-05-01    | 4 - 10'           | 3.9                      | 08-Jun-91       | 13-Jun-91         | 26-Jun-91        |
| BEW-SS-C06-05-01DUP | 4 - 10'           | 2.1                      | 08-Jun-91       | 13-Jun-91         | 26-Jun-91        |
| BEW-SS-C06-05-02    | 12 - 20'          | <0.10                    | 08-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-C06-05-03    | 22 - 27'          | NA                       |                 |                   |                  |
| BEW-SS-C07-01       | 5 - 11'           | 0.3                      | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-C07-02       | 6 - 12'           | 1.6                      | 06-Jun-91       | 07-Jun-91         | 19-Jun-91        |
| BEW-SS-C07-02DUP    | 6 - 12'           | 5.0                      | 06-Jun-91       | 07-Jun-91         | 26-Jun-91        |
| BEW-SS-C07-03-01    | 6 - 10'           | 3.0                      | 06-Jun-91       | 07-Jun-91         | 26-Jun-91        |
| BEW-SS-C07-03-02    | 10 - 14'          | 0.32                     | 06-Jun-91       | 07-Jun-91         | 19-Jun-91        |
| BEW-SS-C07-03-03    | 26 - 30'          | NA                       |                 |                   |                  |
| BEW-SS-C07-04       | 6 - 12'           | 0.71                     | 06-Jun-91       | 07-Jun-91         | 11-Jun-91        |
| BEW-SS-C07-05       | 8 - 12'           | 15                       | 06-Jun-91       | 07-Jun-91         | 18-Jun-91        |
| BEW-SS-C10-01       | 0 - 6'            | <0.10                    | 06-Jun-91       | 15-Jun-91         | 02-Jul-91        |
| BEW-SS-D02-01       | 0 - 6'            | 0.80                     | 12-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-SS-D03-01       | 0 - 6'            | 1.2                      | 12-Jun-91       | 15-Jun-91         | 04-Jul-91        |
| BEW-SS-D04-01       | 0 - 6'            | <0.10                    | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-D04-02       | 0 - 6'            | 0.55                     | 12-Jun-91       | 15-Jun-91         | 04-Jul-91        |
| BEW-SS-D05-01       | 0 - 6'            | 14                       | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-D05-02-01    | 6 - 12'           | 21                       | 10-Jun-91       | 11-Jun-91         | 07-Jul-91        |

39.6 n = 5

TABLE B-1 (continued)  
PCB LABORATORY RESULTS  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLE NUMBER       | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|---------------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-SS-D05-02-01DUP | 6 - 12'           | 5.3                      | 10-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-SS-D05-02-02    | 18 - 23'          | <0.10                    | 10-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-D05-02-03    | 23 - 29'          | NA                       |                 |                   |                  |
| BEW-SS-D05-03-01    | 7 - 13'           | <0.10                    | 10-Jun-91       | 11-Jun-91         | 05-Jul-91        |
| BEW-SS-D05-03-01DUP | 7 - 13'           | 0.64                     | 10-Jun-91       | 12-Jun-91         | 26-Jun-91        |
| BEW-SS-D05-03-02    | 17 - 22'          | 0.45                     | 09-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-D05-03-03    | 22 - 28'          | 0.22                     | 10-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-D05-04-01    | 0 - 6'            | 17                       | 10-Jun-91       | 12-Jun-91         | 07-Jul-91        |
| BEW-SS-D05-04-02    | 10 - 16'          | 3.7                      | 10-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-D05-04-03    | 24 - 28'          | 2.0                      | 10-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-D05-05       | 0 - 2'            | 17                       | 10-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-SS-D06-01       | 0 - 6'            | 6.8                      | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-D06-02-01    | 7 - 11'           | 0.47                     | 08-Jun-91       | 13-Jun-91         | 28-Jun-91        |
| BEW-SS-D06-02-02    | 11 - 15'          | <0.10                    | 08-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-D06-02-03    | 20 - 24'          | NA                       |                 |                   |                  |
| BEW-SS-D06-03       | 6 - 12'           | 12                       | 08-Jun-91       | 13-Jun-91         | 28-Jun-91        |
| BEW-SS-D06-04-01    | 0 - 6'            | 41                       | 08-Jun-91       | 13-Jun-91         | 26-Jun-91        |
| BEW-SS-D06-04-02    | 10 - 14'          | 23                       | 08-Jun-91       | 11-Jun-91         | 13-Jun-91        |
| BEW-SS-D06-04-03    | 22 - 26'          | 0.37                     | 08-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-D06-05       | 0 - 6'            | 0.44                     | 08-Jun-91       | 13-Jun-91         | 28-Jun-91        |
| BEW-SS-D07-01       | 0 - 6'            | 14                       | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-D07-01-02    | 10 - 14'          | 8.2                      | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-D07-01-03    | 22 - 27'          | 0.22                     | 07-Jun-91       | 11-Jun-91         | 06-Jul-91        |
| BEW-SS-D07-02       | 7 - 13'           | 1.9                      | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-D07-03       | 3 - 9'            | 0.23                     | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-D07-04       | 7 - 12'           | 5.3                      | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-D07-05       | 0 - 6'            | 0.88                     | 07-Jun-91       | 11-Jun-91         | 09-Jul-91        |
| BEW-SS-D08-01       | 0 - 6'            | 0.15                     | 05-Jun-91       | 06-Jun-91         | 06-Jun-91        |
| BEW-SS-D08-02-01    | 0 - 6'            | 200                      | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |

297.27 n - 9

**TABLE B-1 (continued)**  
**PCB LABORATORY RESULTS**  
**SITE CHARACTERIZATION STUDY**

**Bluff Electric Works**  
**Poplar Bluff, Missouri**

| SAMPLE NUMBER    | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|------------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-SS-D08-02-02 | 10 - 14'          | 81                       | 07-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SS-D08-02-03 | 23 - 29'          | 1.6                      | 07-Jun-91       | 10-Jun-91         | 24-Jun-91        |
| BEW-SS-D08-03    | 0 - 6'            | 0.39                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-D08-03DUP | 0 - 6'            | 0.35                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-D09-01    | 0 - 6'            | 0.6                      | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-D09-02-01 | 0 - 6'            | 1.2                      | 07-Jun-91       | 10-Jun-91         | 24-Jun-91        |
| BEW-SS-D09-02-02 | 10 - 15'          | 0.11                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-D09-02-03 | 22 - 26'          | <0.10                    | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-D09-03    | 0 - 6'            | 2.2                      | 07-Jun-91       | 10-Jun-91         | 25-Jun-91        |
| BEW-SS-D10-01    | 0 - 6'            | <0.10                    | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-D10-02    | 0 - 6'            | 230                      | 12-Jun-91       | 15-Jun-91         | 08-Jul-91        |
| BEW-SS-D10-03    | 0 - 6'            | 45                       | 12-Jun-91       | 15-Jun-91         | 04-Jul-91        |
| BEW-SS-E01-01    | 0 - 6'            | 0.22                     | 12-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-SS-E02-01    | 0 - 6'            | <0.10                    | 12-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-SS-E03-01    | 0 - 6'            | 0.20                     | 12-Jun-91       | 15-Jun-91         | 01-Jul-91        |
| BEW-SS-E04-01    | 0 - 6'            | <0.10                    | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-E04-02    | 0 - 6'            | 0.12                     | 12-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-SS-E05-01    | 0 - 6'            | 0.35                     | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-E05-02    | 0 - 6'            | 0.66                     | 11-Jun-91       | 12-Jun-91         | 20-Jun-91        |
| BEW-SS-E05-03    | 0 - 6'            | 0.35                     | 11-Jun-91       | 12-Jun-91         | 20-Jun-91        |
| BEW-SS-E06-01    | 0 - 6'            | 120                      | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-E06-02    | 1 - 7'            | <0.10                    | 08-Jun-91       | 11-Jun-91         | 12-Jun-91        |
| BEW-SS-E06-02DUP | 1 - 7'            | 0.11                     | 08-Jun-91       | 13-Jun-91         | 28-Jun-91        |
| BEW-SS-E06-03    | 4 - 9'            |                          |                 |                   |                  |
| BEW-SS-E06-04    | 0 - 6'            | 0.63                     | 08-Jun-91       | 13-Jun-91         | 28-Jun-91        |
| BEW-SS-E07-01    | 5 - 11'           | 1.1                      | 05-Jun-91       | 06-Jun-91         | 07-Jun-91        |
| BEW-SS-E07-02    | 0 - 6'            | 1.1                      | 07-Jun-91       | 10-Jun-91         | 24-Jun-91        |
| BEW-SS-E07-03    | 0 - 6'            | 0.27                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E07-04    | 1 - 6'            | 17                       | 07-Jun-91       | 10-Jun-91         | 25-Jun-91        |

40379 n = 20



TABLE B-1 (continued)  
PCB LABORATORY RESULTS  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLE NUMBER    | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|------------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-SS-E07-05    | 0 - 6"            | 1.3                      | 07-Jun-91       | 10-Jun-91         | 24-Jun-91        |
| BEW-SS-E07-05DUP | 0 - 6"            | 0.83                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E08-01    | 0 - 6"            | <0.10                    | 05-Jun-91       | 06-Jun-91         | 06-Jun-91        |
| BEW-SS-E08-02    | 0 - 6"            | <0.10                    | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E08-03    | 0 - 6"            | 0.54                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E08-03DUP | 0 - 6"            | 0.39                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E08-04    | 0 - 6"            | <0.10                    | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E09-01    | 0 - 6"            | <0.10                    | 05-Jun-91       | 06-Jun-91         | 06-Jun-91        |
| BEW-SS-E09-02    | 0 - 6"            | <0.10                    | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E09-03    | 0 - 6"            | 0.56                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E09-03DUP | 0 - 6"            | 0.71                     | 07-Jun-91       | 10-Jun-91         | 18-Jun-91        |
| BEW-SS-E10-01    | 0 - 6"            | <0.10                    | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-F03-01    | 0 - 6"            | 0.32                     | 12-Jun-91       | 15-Jun-91         | 01-Jul-91        |
| BEW-SS-F04-01    | 0 - 6"            | 0.12                     | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-F04-02    | 0 - 6"            | <0.10                    | 12-Jun-91       | 15-Jun-91         | 04-Jul-91        |
| BEW-SS-F05-01    | 0 - 6"            | 1.3                      | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-F05-02    | 0 - 6"            | 1.4                      | 11-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-SS-F05-03    | 0 - 6"            | 1.7                      | 11-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-SS-F06-01    | 0 - 6"            | 16                       | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-F06-02-01 | 0 - 6"            | 70                       | 11-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-SS-F06-02-02 | 10 - 14"          | 18                       | 11-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-F06-02-03 | 22 - 26"          | 3.7                      | 11-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-F06-03    | 0 - 6"            | 3.8                      | 11-Jun-91       | 12-Jun-91         | 14-Jun-91        |
| BEW-SS-F07-01    | 0 - 6"            | 1.7                      | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-F07-02    | 10 - 14"          | 1.3                      | 11-Jun-91       | 14-Jun-91         | 26-Jun-91        |
| BEW-SS-F07-03    | 22 - 26"          | 59                       | 11-Jun-91       | 14-Jun-91         | 28-Jun-91        |
| BEW-SS-F08-01    | 0 - 6"            | <0.10                    | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SS-G05-01    | 0 - 6"            | 0.34                     | 11-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-SS-G06-01    | 0 - 6"            | 17                       | 11-Jun-91       | 14-Jun-91         | 21-Jun-91        |

118.41 n = 25

**TABLE B-1 (continued)**  
**PCB LABORATORY RESULTS**  
**SITE CHARACTERIZATION STUDY**

**Bluff Electric Works**  
**Poplar Bluff, Missouri**

| SAMPLE NUMBER    | DEPTH INTERVAL | CONCENTRATION (mg/kg) | DATE SAMPLED | DATE EXTRACTED | DATE ANALYZED |
|------------------|----------------|-----------------------|--------------|----------------|---------------|
| BEW-SS-G07-01    | 0 - 6'         | <0.10                 | 11-Jun-91    | 14-Jun-91      | 19-Jun-91     |
| BEW-SS-G07-02    | 0 - 6'         | 11                    | 11-Jun-91    | 17-Jun-91      | 28-Jun-91     |
| BEW-SS-G08-01    | 0 - 6'         | <0.10                 | 12-Jun-91    | 14-Jun-91      | 19-Jun-91     |
| BEW-SS-G09-01    | 0 - 6'         | <0.10                 | 12-Jun-91    | 14-Jun-91      | 19-Jun-91     |
| BEW-SS-H07-01    | 0 - 6'         | 1.8                   | 12-Jun-91    | 14-Jun-91      | 28-Jun-91     |
| BEW-SS-H08-01    | 0 - 6'         | <0.10                 | 12-Jun-91    | 14-Jun-91      | 19-Jun-91     |
| BEW-SS-H09-01    | 0 - 6'         | 0.15                  | 12-Jun-91    | 15-Jun-91      | 06-Jul-91     |
| BEW-SS-I09-01    | 0 - 6'         | 0.30                  | 12-Jun-91    | 15-Jun-91      | 08-Jul-91     |
| BEW-SS-ASP-01-01 | 3 - 9'         | <0.10                 | 11-Jun-91    | 12-Jun-91      | 13-Jun-91     |
| BEW-SS-ASP-01-02 | 12 - 18'       | NA                    |              |                |               |
| BEW-SS-ASP-02-01 | 3 - 9'         | <0.10                 | 11-Jun-91    | 12-Jun-91      | 13-Jun-91     |
| BEW-SS-ASP-02-02 | 12 - 18'       | NA                    |              |                |               |
| BEW-SS-PAD-01-01 | 0 - 5'         | 36                    | 08-Jun-91    | 11-Jun-91      | 13-Jun-91     |
| BEW-SS-PAD-01-02 | 12 - 17'       | <0.10                 | 08-Jun-91    | 18-Jun-91      | 06-Jul-91     |
| BEW-SS-PAD-02-01 | 0 - 6'         | 150                   | 08-Jun-91    | 11-Jun-91      | 13-Jun-91     |
| BEW-SS-PAD-02-02 | 12 - 18'       | 4.6                   | 08-Jun-91    | 18-Jun-91      | 06-Jul-91     |
| BEW-SS-PAD-03-01 | 0 - 6'         | 170                   | 08-Jun-91    | 11-Jun-91      | 13-Jun-91     |
| BEW-SS-PAD-03-02 | 12 - 18'       | 7.3                   | 08-Jun-91    | 18-Jun-91      | 06-Jul-91     |
| BEW-SS-PAD-06-01 | 0 - 6'         | 57                    | 09-Jun-91    | 11-Jun-91      | 12-Jun-91     |
| BEW-SS-PAD-06-02 | 12 - 18'       | 33                    | 09-Jun-91    | 16-Jun-91      | 08-Jul-91     |
| BEW-SS-PAD-07-01 | 0 - 6'         | 14                    | 09-Jun-91    | 11-Jun-91      | 13-Jun-91     |
| BEW-SS-PAD-07-02 | 12 - 18'       | 8.2                   | 09-Jun-91    | 18-Jun-91      | 06-Jul-91     |
| BEW-SS-PAD-08-01 | 0 - 6'         | 15                    | 09-Jun-91    | 11-Jun-91      | 13-Jun-91     |
| BEW-SS-PAD-08-02 | 12 - 18'       | 1.7                   | 09-Jun-91    | 18-Jun-91      | 06-Jul-91     |
| BEW-SS-PAD-09-01 | 0 - 6'         | 1.5                   | 09-Jun-91    | 11-Jun-91      | 12-Jun-91     |
| BEW-SS-PAD-09-02 | 12 - 18'       | 0.60                  | 09-Jun-91    | 18-Jun-91      | 06-Jul-91     |
| BEW-SS-PAD-10-01 | 0 - 6'         | 22                    | 10-Jun-91    | 11-Jun-91      | 13-Jun-91     |
| BEW-SS-PAD-10-02 | 12 - 18'       | 1.5                   | 10-Jun-91    | 18-Jun-91      | 06-Jul-91     |
| BEW-SS-PAD-13-01 | 0 - 6'         | 0.77                  | 10-Jun-91    | 11-Jun-91      | 13-Jun-91     |

**TABLE B-1 (continued)  
PCB LABORATORY RESULTS  
SITE CHARACTERIZATION STUDY**

**Bluff Electric Works  
Poplar Bluff, Missouri**

| SAMPLE NUMBER    | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|------------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-SS-PAD-13-02 | 12 - 18'          | 0.18                     | 10-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-PAD-16-01 | 0 - 6'            | 0.23                     | 10-Jun-91       | 11-Jun-91         | 13-Jun-91        |
| BEW-SS-PAD-16-02 | 12 - 15'          | 0.23                     | 10-Jun-91       | 18-Jun-91         | 06-Jul-91        |
| BEW-SS-PAD-17-01 | 0 - 6'            | <0.10                    | 10-Jun-91       | 11-Jun-91         | 13-Jun-91        |
| BEW-SS-PAD-17-02 | 12 - 16'          | NA                       |                 |                   |                  |
| BEW-SS-UST-01    | 9'                | <0.10                    | 11-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-SD-01        | 0 - 6'            | 15                       | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SD-02        | 0 - 6'            | 0.51                     | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SD-03        | 0 - 6'            | 13                       | 06-Jun-91       | 10-Jun-91         | 10-Jun-91        |
| BEW-SD-04        | 0 - 6'            | 40                       | 10-Jun-91       | 11-Jun-91         | 08-Jul-91        |
| BEW-SD-05        | 0 - 6'            | 0.22                     | 10-Jun-91       | 11-Jun-91         | 05-Jul-91        |
| BEW-SD-06        | 0 - 6'            | 0.71                     | 11-Jun-91       | 13-Jun-91         | 19-Jun-91        |
| BEW-SD-07        | 0 - 6'            | 0.37                     | 11-Jun-91       | 13-Jun-91         | 19-Jun-91        |
| BEW-SD-08        | 0 - 6'            | 0.28                     | 11-Jun-91       | 13-Jun-91         | 19-Jun-91        |
| BEW-SD-09        | 0 - 6'            | 53                       | 11-Jun-91       | 14-Jun-91         | 28-Jun-91        |
| BEW-SD-10        | 0 - 6'            | 13                       | 11-Jun-91       | 14-Jun-91         | 26-Jun-91        |
| BEW-SD-11        | 0 - 6'            | 0.10                     | 11-Jun-91       | 12-Jun-91         | 13-Jun-91        |
| BEW-SD-12        | 0 - 6'            | 1.6                      | 11-Jun-91       | 12-Jun-91         | 13-Jun-91        |
| BEW-AS-01        | 0 - 3'            | 0.15                     | 11-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-AS-02        | 0 - 3'            | <0.10                    | 11-Jun-91       | 14-Jun-91         | 19-Jun-91        |
| BEW-CR-01        | 0 - 1'            | 5.2                      | 08-Jun-91       | 13-Jun-91         | 01-Jul-91        |
| BEW-CR-02        | 0 - 1'            | 0.14                     | 08-Jun-91       | 13-Jun-91         | 28-Jun-91        |
| BEW-CR-03        | 0 - 1'            | 0.13                     | 08-Jun-91       | 13-Jun-91         | 28-Jun-91        |
| BEW-CR-04        | 0 - 1'            | NA                       |                 |                   |                  |
| BEW-CR-05        | 0 - 1'            | NA                       |                 |                   |                  |
| BEW-CR-06        | 0 - 1'            | 203                      | 09-Jun-91       | 12-Jun-91         | 01-Jul-91        |
| BEW-CR-07        | 0 - 1'            | 51                       | 09-Jun-91       | 12-Jun-91         | 27-Jun-91        |
| BEW-CR-08        | 0 - 1'            | 81                       | 09-Jun-91       | 12-Jun-91         | 27-Jun-91        |
| BEW-CR-09        | 0 - 1'            | 0.44                     | 09-Jun-91       | 21-Jun-91         | 27-Jun-91        |

TABLE B-1 (continued)  
PCB LABORATORY RESULTS  
SITE CHARACTERIZATION STUDY

Bluff Electric Works  
Poplar Bluff, Missouri

| SAMPLE NUMBER   | DEPTH<br>INTERVAL | CONCENTRATION<br>(mg/kg) | DATE<br>SAMPLED | DATE<br>EXTRACTED | DATE<br>ANALYZED |
|-----------------|-------------------|--------------------------|-----------------|-------------------|------------------|
| BEW-CR-09DUP    | 0 - 1'            | 0.35                     | 09-Jun-91       | 21-Jun-91         | 27-Jun-91        |
| BEW-CR-10       | 0 - 1'            | 0.64                     | 10-Jun-91       | 12-Jun-91         | 07-Jul-91        |
| BEW-CR-11       | 0 - 1'            | 38                       | 10-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-CR-12       | 0 - 1'            | 14                       | 10-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-CR-13       | 0 - 1'            | 23                       | 10-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-CR-14       | 0 - 1'            | 23                       | 10-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-CR-15       | 0 - 1'            | 1.5                      | 10-Jun-91       | 12-Jun-91         | 08-Jul-91        |
| BEW-CR-16       | 0 - 1'            | 16                       | 10-Jun-91       | 12-Jun-91         | 08-Jul-91        |
| BEW-CR-17       | 0 - 1'            | 120                      | 10-Jun-91       | 12-Jun-91         | 08-Jul-91        |
| BEW-CR-18       | 0 - 1'            | 15                       | 10-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-CR-19       | 0 - 1'            | 7.2                      | 11-Jun-91       | 12-Jun-91         | 28-Jun-91        |
| BEW-CR-20       | 0 - 1'            | 7.0                      | 11-Jun-91       | 13-Jun-91         | 01-Jul-91        |
| BEW-CR-21       | 0 - 1'            | 0.28                     | 11-Jun-91       | 13-Jun-91         | 19-Jun-91        |
| BEW-EB-01, ug/l |                   | <2.5                     | 07-Jun-91       | 11-Jun-91         | 24-Jun-91        |
| BEW-EB-02, ug/l |                   | <2.5                     | 08-Jun-91       | 11-Jun-91         | 24-Jun-91        |
| BEW-EB-03, ug/l |                   | <2.5                     | 11-Jun-91       | 13-Jun-91         | 21-Jun-91        |
| BEW-EB-04, ug/l |                   | <2.5                     | 12-Jun-91       | 13-Jun-91         | 26-Jun-91        |
| BEW-FB-01, ug/l |                   | <2.5                     | 07-Jun-91       | 11-Jun-91         | 24-Jun-91        |
| BEW-FB-03, ug/l |                   | <2.5                     | 09-Jun-91       | 21-Jun-91         | 28-Jun-91        |
| BEW-FB-04, ug/l |                   | <2.5                     | 12-Jun-91       | 13-Jun-91         | 26-Jun-91        |
| BEW-MS-01       |                   | 0.42                     | 12-Jun-91       | 15-Jun-91         | 01-Jul-91        |
| BEW-MSD-01      |                   | 0.39                     | 12-Jun-91       | 15-Jun-91         | 01-Jul-91        |

NOTE: NA - Not Analyzed

## **B-2 Dioxins and Furans Laboratory Results**

**TABLE B-2  
DIOXINS AND FURANS LABORATORY RESULTS  
SITE CHARACTERIZATION STUDY**

**Bluff Electric Works  
Poplar Bluff, Missouri**

| <b>ANALYTE</b>                                                                         | <b>METHOD BLANK (S)<br/>(ppb)</b> | <b>BEW-CR-04<br/>(ppb)</b> | <b>BEW-CR-05<br/>(ppb)</b> |
|----------------------------------------------------------------------------------------|-----------------------------------|----------------------------|----------------------------|
| 2378-TCDD                                                                              | <0.005                            | <0.005                     | 0.006                      |
| 12378-PeCDD                                                                            | <0.01                             | <0.008                     | EMPC (0.02)                |
| 123478-HxCDD                                                                           | <0.008                            | <0.005                     | 0.01                       |
| 123678-HxCDD                                                                           | <0.008                            | <0.005                     | 0.04                       |
| 123789-HxCDD                                                                           | <0.008                            | <0.005                     | 0.04                       |
| 12345678-HpCDD                                                                         | <0.01                             | <0.01                      | 0.36                       |
| OCDD                                                                                   | <0.01                             | EMPC (0.02)                | 1.1                        |
| 2378-TCDF                                                                              | <0.003                            | <0.003                     | 1.1                        |
| 12378-PeCDF                                                                            | <0.005                            | <0.005                     | 0.25                       |
| 23478-PeCDF                                                                            | <0.005                            | <0.005                     | 0.57                       |
| 123478-HxCDF                                                                           | <0.005                            | <0.003                     | 0.32                       |
| 123678-HxCDF                                                                           | <0.005                            | <0.003                     | 0.46                       |
| 234678-HxCDF                                                                           | <0.003                            | <0.003                     | <0.003                     |
| 123789-HxCDF                                                                           | <0.005                            | <0.003                     | <0.003                     |
| 12345678-HpCDF                                                                         | <0.005                            | 0.004                      | 0.95                       |
| 1234789-HpCDF                                                                          | <0.008                            | <0.005                     | EMPC (0.04)                |
| OCDF                                                                                   | <0.008                            | <0.005                     | 0.10                       |
| Total TCDD                                                                             | EMPC (0.60)                       | EMPC (0.61)                | 0.02                       |
| Total PeCDD                                                                            | <0.01                             | EMPC (0.04)                | 0.05                       |
| Total HxCDD                                                                            | <0.008                            | <0.005                     | 0.36                       |
| Total HpCDD                                                                            | <0.01                             | <0.01                      | 0.68                       |
| Total TCDF                                                                             | EMPC (0.02)                       | EMPC (0.02)                | 9.3                        |
| Total PeCDF                                                                            | <0.005                            | EMPC (0.13)                | 17.1                       |
| Total HxCDF                                                                            | <0.005                            | 0.009                      | 21.0                       |
| Total HpCDF                                                                            | <0.008                            | 0.005                      | 2.5                        |
| ppb - parts per billion<br>S - Soil<br>EMPC - Estimated Maximum Possible Concentration |                                   |                            |                            |

## **APPENDIX IV**

**Bluff Electric Works Site, Poplar Bluff, MO**

**Risk Assessment Issue Paper on  
the Feasibility of an Oral to Dermal RfD Extrapolation for Copper**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF RESEARCH AND DEVELOPMENT  
ENVIRONMENTAL CRITERIA AND ASSESSMENT OFFICE  
CINCINNATI, OHIO 45268

ECAD file

Dr. Cherri Baysinger-Daniels  
Missouri Department of Health  
Bureau of Environmental Epidemiology  
1730 East Elm  
Jefferson City, Missouri 65102

RE: Oral and Dermal Absorption Factors for Multiple Chemicals and  
Route-to-Route Extrapolation (Crown Plating Site/  
St. Louis, MO)

Dear Dr. Baysinger-Daniels:

This letter is in response to your request for oral and dermal  
absorption factors for multiple chemicals and route-to-route  
extrapolation for the Crown Plating Site, St. Louis, MO.

The information is contained in:

Enclosure 1

*Correct*  
*ED* → Table 1 - Contains oral absorption factors for the  
requested chemicals. *(chemicals)*

*EXTRAPOLATION* → Table 2 - Contains dermal absorption factors for the  
requested chemicals. *(assessment)*

Enclosure 2

Contains a Risk Assessment Issue Paper for:  
Evaluation of Oral-to-Dermal Extrapolation.

If you have any additional questions, please feel free to  
contact me at (513) 569-7300.

Respectfully,

*R. Fung*  
Pei-Fung Hurst, Ph.D.  
Coordinator, Superfund Health Risk  
Technology Support Center  
Chemical Mixtures Assessment Branch

Enclosures

cc: D. Crawford (Region VII)  
C. DeRosa (ECAO-Cin)  
J. Dinan (OS-230)  
T. Harvey (ECAO-Cin)  
B. Means (OS-230)  
W.B. Peirano (ECAO-Cin)

REC-11  
JUN 11 1988  
Office of Management  
and Administration



## Enclosure II

### Risk Assessment Issue Paper for: Evaluation of Oral-to-Dermal Extrapolation

Available EPA documents and ATSDR Toxicological Profiles were reviewed for each of the 18 chemicals to evaluate the use of modified oral toxicity values in characterizing dermal toxicity risk.

A general principal utilized in our evaluations is the assumption that toxic effects are not route-specific unless there are data to indicate otherwise. This principal has been discussed in the seventh draft of the General Quantitative Risk Assessment Guidelines for Noncancer Health Effects (U.S. EPA, 1989b). Thus, in the absence of dermal toxicity data, the type of effects produced are assumed to be equivalent to those produced by oral exposure unless other data (e.g., route-specific metabolism or observation of localized effects) indicate otherwise.

#### 2. ARSENIC (U.S. EPA, 1980b, 1984a; ATSDR, 1989)

Data in humans indicate that the skin, gastrointestinal tract, and the hematological and cardiovascular systems are the targets of toxicity following oral exposure to arsenic. A chronic oral RfD is currently under review by the U.S. EPA (1991a). Arsenic has been found to be carcinogenic in humans following both oral (skin cancer) and inhalation (respiratory tract cancer) exposure and the U.S. EPA (1991a) has verified unit risk factors for cancer resulting from both oral and inhalation exposure.

Dermal exposure to inorganic arsenic has been reported to lead to dermatitis.

The available data provide no evidence that dermal exposure to arsenic will produce effects different from those produced by oral exposure; therefore oral-to-dermal extrapolation is appropriate.

#### 6. COPPER (U.S. EPA, 1984e, 1987b; ATSDR, 1989)

Dietary studies in rats have shown that excess levels of copper in the liver and kidney can result in centrilobular necrosis and extensive degeneration of the proximal convoluted tubule epithelium. These effects are followed by regeneration of the tissue and development of tolerance to continued dosing. In humans, oral exposure to high concentrations of copper can result in gastrointestinal irritation, manifested as vomiting, nausea, and diarrhea.

There is limited information on the toxicity of topically applied

copper. Allergic contact dermatitis has been observed in some individuals. In addition, there are numerous reports of localized pruritus in individuals wearing copper containing jewelry. Thus, it appears that some individuals are unusually susceptible to the toxic effects of dermal exposure to copper.

Copper is an essential nutrient; there are several mechanisms to prevent gastrointestinal absorption of levels of copper that would exceed the nutritional requirement. Excess copper absorbed into gastrointestinal mucosal cells is bound to metallothionein. This bound copper is excreted when the cell is sloughed off. Excess copper that eludes the intestinal barrier can be stored in the liver or incorporated into bile and excreted in the feces.

There are insufficient data on the carcinogenicity of copper, it is given assigned to U.S. EPA weight of evidence group D (not classifiable as to human carcinogenicity) (U.S. EPA, 1991a).

In summary, there are numerous mechanisms of maintaining copper homeostasis. Gastrointestinal mechanisms include vomiting after ingestion of a high concentration of copper and sequestration of copper by metallothionein in gastrointestinal mucosal cells. Dermal absorption of copper would bypass these important homeostatic mechanisms and may result in increased toxicity. These differences in pharmacokinetic properties of oral and dermal exposure would preclude a route-to-route extrapolation of a dermal toxicity value from oral toxicity data.

## 12. CYANIDE (U.S. EPA, 1988a; ATSDR, 1988)

Ingestion of high doses of cyanide can rapidly cause death by producing histotoxic hypoxia. Lower doses of cyanide can be effectively detoxified by rhodanese in the liver. The nervous system and the thyroid appear to be the target organs for the toxicity of oral cyanide exposure. U.S. EPA (1991a) derived a verified oral RfD for free cyanide based on weight loss, thyroid effects and nervous system effects in chronically exposed rats. Cyanide has not been shown to be carcinogenic following any route of exposure.

Dermal exposure to cyanide has resulted in neurological effects in both humans and animals. In the human studies, however, concomittent inhalation and oral exposure occurred. Doses associated with the neurological effects have not been quantitated.

Ingested cyanide is effectively detoxified by the liver, but it is uncertain if dermally applied would be detoxified as effectively. It seems possible that dermally absorbed cyanide (due to the lack of a "first pass effect") may be subject to a more widespread distribution throughout the body before being detoxified in the liver. Therefore, performing an oral-to-dermal extrapolation would not be appropriate because of the uncertainty that the oral RfD for cyanide would provide protection for the