00800.3

 \mathbf{t}

المدافعتا رنسا

 $\frac{1}{2}$

 γ Ĵ.

PHASE II REMEDIAL INVESTIGATION REPORT

FOR PETOSKEY MANUFACTURING SITE PETOSKEY, MICHIGAN

PREPARED FOR MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

FEBRUARY 1998

PREPARED BY MALCOLM PIRNIE ENGINEERS, LLP 1400 ABBOTT ROAD, SUITE 140 EAST LANSING, MICHIGAN 48823

RECYCLED PAPER

 $\ddot{ }$

 $\frac{1}{2}$

ung
La

PHASE II REMEDIAL INVESTIGATION REPORT

FOR PETOSKEY MANUFACTURING SITE PETOSKEY, MICHIGAN

PREPARED FOR MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL RESPONSE DIVISION

> DRAFT: JULY 15, 1996 REVISION 1: DECEMBER 15, 1997 REVISION 2: FEBRUARY 18, 1998

PREPARED BY MALCOLM PIRNIE ENGINEERS, LLP 1400 ABBOTT ROAD EAST LANSING, MICHIGAN 48823

 $\frac{1}{\sqrt{2}}$ $\frac{1}{\sigma}$

 $\frac{1}{2}$

PETOSKEY MANUFACTURING PHASE II REMEDIAL INVESTIGATION REPORT

TABLE OF CONTENTS

TABLE OF CONTENTS (continued)

Page

Ų.

J.

L,

TABLE OF CONTENTS (continued)

 ~ 100 km ~ 100

LIST OF TABLES

 $\overline{1}$

TABLE OF CONTENTS (continued)

LIST OF TABLES

2420-OI7--H41 PH2RI.TOC iv

 \bar{u} $\bar{\zeta}_{\rm{c}}$ \sim \bar{z}

 $\overline{1}$

 \overline{a}

 $\overline{}$

 \sim

TABLE OF CONTENTS (continued)

 \mathcal{L}_{eff}

LIST OF TABLES

LIST OF FIGURES

j.

 \ddotsc

TABLE OF CONTENTS (continued)

LIST OF APPENDICES

 \sim

1.0 INTRODUCTION

 $\ddot{}$. .
س

1.1 BACKGROUND

1.1.1 Site Location and Description

Petoskey Manufacturing Company (PMC) is a die casting and plating facility located at 200 West Lake Street, in a residential area of the City of Petoskey, Emmet County, Michigan, as shown on Figure 1-1. For the purpose of the Remedial Investigation, the U.S. Environmental Protection Agency (USEPA) and the Michigan Department of Environmental Quality (MDEQ) define the "site" as the PMC property and the PMC-related contaminated groundwater. The MDEQ is reporting that it is the City of Petoskey's intent to rezone the area where PMC is located to a multi-family residential area, with PMC being a "non-conforming" use. Relevant physical features in the vicinity of PMC are shown on Figure 1-2. PMC began manufacturing small trim parts for the automotive industry in 1946. Painting operations were added to the plant in the late 1960's.

The PMC facility is bordered to the north by a condominium complex. A vacant lot, owned by the City of Petoskey, is located west of the condominium complex. Immediately north of the condominiums is Little Traverse Bay of Lake Michigan, approximately 500 feet north of the facility. Several residences are located to the east and south of PMC. Bear Creek, which drains into Little Traverse Bay, is located approximately 500 feet east of the facility. PMC is bordered on the west by a vacant lot which is occasionally used by the Fraternal Order of Eagles which owns the building immediately west of the lot. Immediately south of Lake Street, behind the row of houses, is a steep bluff running approximately parallel to the shoreline.

The year-round population of Petoskey is approximately 7,000 with a seasonal influx of 3,000 to 5,000 additional residents. Winter and summer tourism is a major economic force in the area. The climate of Emmet County is strongly influenced by its proximity to Lake Michigan. Seasonal temperatures are moderated by the lake, with summer high temperatures averaging 68 °F

PH2R1.028 02/18/98 02/18 $2420-017-H41$ 1-1

 $\frac{1}{\sqrt{2}}$

 \ddotsc

 \mathbb{R}^2

and winter highs averaging 35°F. The average annual rainfall for Emmet County is 28 inches, and the average annual snowfall is 66 inches per year (McNamee, 1994).

The MDEQ reports that as of December 1997, the City of Petoskey's primary water supply is groundwater provided by the Bay Harbor development. The Ingalls municipal well, located approximately 700 feet northwest of PMC along the shoreline of Little Traverse Bay used to be the primary water supply well for the City and will be used as a backup water supply well until it is eventually abandoned. The Ingalls municipal well is a 36-foot diameter dug well extending to a depth of 1 6 feet below ground level (bgl) and receiving a large percentage of recharge water from Little Traverse Bay.

1.1.2 Regional Geology and Hydrogeology

The bedrock underlying the site and surrounding areas consists of alternating limestones and shales of the Devonian Traverse Group. These strata were deposited during times of fluctuating marine conditions due to either changing water depths or changes in conditions in adjoining lands. The Traverse Group formation occurs in the Northern and Southern portions of the Lower Peninsula as one of the formations near the outer edge of the Michigan Basin (WMU, 1981). The Traverse Group outcrops in several locations in the vicinity of the site.

Overlying the bedrock in this area is a cover of glacial till, outwash, and alluvium, mainly of late Pleistocene to Holocene age. Regionally, the glacial deposits range in thickness up to approximately 200 feet. The glacial deposits in the vicinity of the site include fine to medium grained lacustrine sand and gravel, dune sand, glacial outwash sand and gravel and coarse-textured glacial till.

The major source of drinking water in the area is groundwater from glacial drift and bedrock aquifers. These aquifers are recharged by infiltrating precipitation or by Lake Michigan. The glacial drift in the vicinity of the site generally consists of interbedded aquifers, aquicludes, and aquitards, and may or may not have an aquifer present near the surface. Dissolved solids concentrations in the

MAICOL PIRNIE

u. $\langle \cdot \rangle$ $\hat{\mathcal{L}}$.

 \sim

groundwater in the vicinity of the site typically range from 0 to 500 mg/ℓ ; specific conductance values typically range from 0 to 830 μ mhos/cm (WMU, 1981).

1.1.3 Site History/Previous Investigations

An analysis of 17 site aerial photographs covering the period of 1938 to 1991 has been conducted by the United States Environmental Protection Agency (USEPA). The results of the analysis were presented in the USEPA's 1991 air photo evaluation report entitled "Site Analysis, Petoskey Manufacturing Company, Petoskey, Michigan" (USEPA, 1991b). Based on information presented in the report, historical activities in the area to the north of PMC (the area currently occupied by the condominiums and extending west to the Ingalls well) included a fuel storage area, a coal storage area, and a railroad repair yard. Three vertical and eight horizontal storage tanks, fuel pumps, drums, and large areas of stained soils were identified in photographs taken between 1938 and 1971. Analysis of the 1973, 1974, 1978, and 1982 photographs indicated a decrease in railroad activities over time. The railroad activity may have ended by 1982. In the 1982 photograph, the tanks, drums, and fuel pumps had been removed. In the 1991 photograph, the condominiums had been constructed and the remains of the former railroad operations had been removed and the area graded. The railroad station house is the only remaining railroad structure identified in the 1991 photograph.

The area to the northeast of PMC was not included in the scope of the USEPA aerial photography review report. However, the Phase I Draft Remedial Investigation (RI) Report (Eder, 1993) identified a former coal gasification plant in this area. The report states that the plant was present in the 1938 aerial photo, but did not exist in the 1982 photo. This area is currently used as a city park. The MDEQ is currently undertaking remedial activities at that location to address contaminated soils.

Analyses of water samples collected from the Ingalls well in 1981 by the Michigan Department of Public Health (MDPH) identified the presence of trichloroethene (TCE) at concentrations ranging from 20 μ g/l to 50 μ g/l, 1,2-dichloroethene (DCE) ranging from 7 μ g/l to

PH2RI.028 02/18/98 02/18 $2420-017-H41$ 1-3

conducted in 1982 by the MDEQ (known prior to October 1, 1995 as Michigan Department of Natural P.esources) identified the presence of elevated concentrations of volatile organic compounds (VOCs) in soil samples collected from the west side of the PMC building. Based on the soil sample analytical results, USEPA and MDEQ identified PMC as a Potentially Responsible Party, and waste handling practices at the plant as a source of contamination. In 1982, PMC removed contaminated soils from the west side of the building to a depth ranging from two to five feet below ground level (bgl), until large limestone boulders were encountered. The excavation was backfilled with clean soils, covered with a plastic liner, and the liner covered with approximately 6 inches of soil.

In 1982 and 1983, MDEQ installed five groundwater monitoring wells, PS-1, PS-4, PS-6, PS-10, PS-11, shown on Figure 2-2, as part of a preliminary groundwater investigation. This investigation confirmed the presence of groundwater contamination at the PMC site, and identified a northwesterly groundwater flow direction, from the PMC property towards the Ingalls well

In 1984, a new municipal water supply well was installed approximately one mile to the northeast of the Ingalls well, but the Ingalls well continued to serve as the primary water supply well (providing approximately 65% of the City's water) for the City of Petoskey, until December 1997. At that time, the Bay Harbor groundwater supply became the primary source of City water. Also in 1984, the USEPA issued an Administrative Order (AO) to PMC. The AO required PMC to conduct further hydrogeological studies. PMC then installed four monitoring well clusters, PS-A, PS-B, PS-C, and PS-D. Each cluster consisted of one shallow (approximately 20 feet bgl) and one deep (approximately 40 feet bgl) well. The locations of these well clusters are shown on Figure 2-2. Sampling of these wells in 1985 identified TCE at concentrations up to 144 ug/0 and DCE at concentrations up to 44 μ g/l. Samples collected from the Ingalls well in 1985 contained TCE and DCE at concentrations of 12 μ g/l and 2μ g/l, respectively.

In 1987, PMC was directed to conduct a full Remedial Investigation (RJ) and Feasibility Study (FS) under a second AO issued by USEPA. PMC began work on the RI in 1988 with the installation of four additional monitoring wells: PS-104, PS-105S, PS-105D, and PS-106 (Figure 2- 2).

ا يناد

In 1990, a hydraulic fluid spill at PMC was reported by the Emmet County Health Department. The report stated that "standing oils" were present in several rooms of the PMC building. During an inspection of the facility in May 1990, MDEQ personnel observed hydraulic fluid on the floors around the die casting machines located in the eastern and northeastern portions of the building and in the compressor room which is located in the northwest corner of the building. The exterior walls of the building were stained up to 3 feet above the ground surface. Soil adjacent to the building was also stained.

On May 31, 1990, the USEPA collected groundwater and soil samples from the northwest and west sides of the PMC building. Analytical data from these samples identified elevated concentrations of semi-volatile organic compounds (SVOCs) in soils, as well as DCE, TCE, and tetrachloroethene (PCE) in the groundwater.

The USEPA assumed responsibility for the remedial investigation in 1990 because of PMC delays in Work Plan development and because PMC filed for bankruptcy under Chapter 11 of federal bankruptcy codes. Lead responsibility for remedial activities at this site was delegated to MDEQ. In 1992, MDEQ retained Eder Associates (Eder) to develop a Phase I Remedial Investigation Work Plan and to implement the investigations. RI field activities were conducted from September 1992 to March 1993. They included the collection and analysis of seven surface soil samples, collection and analysis of subsurface soil samples at 16 locations, installation of three monitoring wells (PS-12, PS-13, PS-1R), collection and analysis of two sets of groundwater and surface water samples, and collection and analysis of a third set of groundwater samples. Data collected during these activities were used to prepare a Phase I Draft RI Report in December 1993 (Eder, 1993). Review of this report by USEPA and MDEQ identified data gaps and the need for additional investigations.

In May 1994, MDEQ requested Malcolm Pirnie to conduct a Phase II Remedial Investigation and prepare a Focused Feasibility Study. This report presents the results of the Phase II Remedial Investigation and soil analytical data from the Phase I Remedial Investigation.

According to MDEQ, in 1995 the USEPA signed a Record of Decision which made available \$1,238,000 towards an alternate water supply for the City of Petoskey due to concern about

MAICOLM PIRNIE

÷,

 $\frac{1}{3}$

groundwater contamination in the Ingalls well. To date, the State of Michigan has provided \$500,000 towards this alternate water supply (Bay Harbor groundwater) because federal funds have not yet been made available.

1.2 PROJECT PURPOSE AND OBJECTIVES

The overall purpose of the Phase Π Remedial Investigation was to collect supplemental soil and groundwater data to address data gaps identified during the Phase I Remedial Investigation, and to be used in evaluating possible remedial action alternatives.

The objectives of the RI were to:

- Evaluate the nature and extent and indirectly estimate the magnitude of volatile organic compound (VOC) contamination in the unsaturated zone under the northwest corner of the PMC building.
- Evaluate the nature and magnitude of VOC contamination in the groundwater at the site, including the area under the northwest comer of the PMC building.
- Evaluate the presence and nature of, and estimate the lateral extent of light non-aqueous phase liquids (LNAPLs) in the vicinity of and underneath the northwest corner of the PMC building.
- Evaluate the nature and extent of pesticide and SVOC contamination in the soil and groundwater at the site.
- Estimate hydraulic properties of the aquifer at the site and characterize hydrostratigraphic zones in the vicinity of the Ingalls municipal well.

PH2RI.028 02/18/98 02/18/98 $2420-017-H41$ $1-6$

- Evaluate the capability of soil vapor extraction (SVE) technology to reduce VOC concentrations in the unsaturated zone under the northwest corner of the PMC building.
- Supplement and update the baseline human heath risk assessment produced by Eder during the Phase I Remedial Investigation, using existing information and newly developed data.

1.3 REMEDIAL INVESTIGATION SCOPE

The activities performed as part of the Phase II Remedial Investigation included:

- Collection and analysis of soil samples at four boring locations adjacent to and underneath the PMC building.
- Collection and analysis of background soil samples from two borings located hydraulically upgradient of the PMC building to assist in determination of background concentrations of analytes.
- Installation of seven monitoring wells at five locations to provide groundwater monitoring points and observation points for a soil vapor extraction test.
- Collection and analysis of one set of groundwater samples from 31 monitoring wells and the Ingalls municipal well to evaluate the nature and extent of any groundwater contamination.
- Measurement of water levels in selected monitoring wells on three occasions.

- Performance of a pumping test to collect data to be used in estimating hydraulic properties of the aquifer.
- Performance of field permeability (slug) tests at five monitoring wells and estimation of hydraulic conductivity values.
- Performance of a soil vapor extraction test to access the presence of VOCs in the unsaturated zone beneath the PMC building.
- Preparation of a baseline human health risk assessment using groundwater analytical data collected during this RI and incorporating new soil analytical data with existing soil analytical data collected during the Phase I RI conducted by Eder Associates.

Soil data from both phases of the RI were used for site evaluation and risk assessment. The soil data obtained through the two phases of the RI represent samples collected from different locations, therefore are complementary. Phase II RI groundwater data were generally obtained from the same locations as during the Phase I RI, and were used for the site evaluation and risk assessment because they represent current site conditions.

÷,

 $\bar{\omega}$

i. $\frac{1}{2}$

السان

2.0 REMEDIAL INVESTIGATION

2.1 SOIL INVESTIGATION

The following sections provide descriptions of the components of the Phase Π Soil Investigation.

2.1.1 Soil Sampling

Soil samples were collected in August, 1995 from four locations adjacent to (SB-201 and SB-202) and under the Petoskey Manufacturing Company (PMC) building (SB-203 and SB-204) to evaluate the presence and nature of soil contamination. Additionally, soil samples were collected from two locations (SB-206 and SB-207) hydraulically upgradient to the PMC building to assist in determining the background concentrations of compounds of concern detected in the soils to their concentrations in the soils near the PMC building. The soil sampling locations are shown on Figure 2-1. The soil samples were collected according to the procedures described in the Work Plan (Malcolm Pirnie, 1995b) and Quality Assurance Project Plan (QAPP) (Malcolm Pirnie, 1995a) for the Phase II Remedial Investigation.

The soil samples collected near the PMC building were, in general, collected from 0 to 2 feet below ground level (bgl), 5 to 7 feet bgl, and directly above the water table (approximately 12 to 16 feet bgl). Several of the proposed soil samples could not be collected because of insufficient soil recovery from specific depths, due to the presence of cobbles or boulders. At depth intervals where sufficient soil volume was recovered, the soil samples were analyzed for Target Analyte List (TAL) and Target Compound List (TCL) analytes. At depth intervals where the soil volume recovery was insufficient for a complete set of analyses, the sample jars were filled in the following order: volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides / polychlorinated biphenyls (PCBs), and metals, until the soil recovered from that sampling interval had been exhausted. At boring location SB-203D, additional soil was collected at depth intervals where there

PH2RI.028 02/18/98 02/18 $2-1$ 2420-017-H41 2-1

$MAICOL$ PIRNIE

was not sufficient soil collected at the corresponding boring location SB-203S for the full suite of analyses.

The soil samples were submitted to USEPA's Contract Laboratory Program (CLP) facilities for analysis of VOCs, SVOCs, pesticides, PCBs, metals, and cyanide (TCL and TAL compounds) as follows: Envirosystems, Inc. or Clayton Environmental Consultants (organic compounds), and American Analytical and Technical Services or CKY, Inc. (inorganic compounds). The total petroleum hydrocarbons (TPH) and diesel range organics (DRO) analyses were performed by ENCOTEC Laboratory, outside of the USEPA CLP program.

The soil sampling analytical data have been compiled into tables and are presented in this report as follows:

Table 5-3 Semi-Volatile Organic Compounds

Table 5-4 Pesticides and PCBs

Table 5-5 Inorganic Compounds

Table 5-6 Tentatively Identified Volatile Organic Compounds

Table 5-7 Tentatively Identified Semi-Volatile Organic Compounds

The laboratory data packages are available in the MDEQ-Superfund files. The soil sampling analytical data are discussed in Section 5.1.

2.1.2 Soil Vapor Extraction Test

Two soil vapor extraction (SVE) tests were performed in September, 1995 to assess the magnitude of VOC contamination in the unsaturated soils under the northwest portion of the PMC building and evaluate the effectiveness of SVE technology to remove VOC contamination from this portion of the site. A description of the setup and performance of the SVE tests and the analysis of the data are discussed in Section 3.1.

$MAICOM$ PIRNIE

2.2 GROUNDWATER INVESTIGATION

The following sections provide descriptions of the components of the Phase II Groundwater Investigation.

2.2.1 Monitoring Well Installation

Seven monitoring wells were installed at five locations (3 single monitoring wells and 2 well clusters) in August 1995, in order to evaluate the nature and extent of contaminants in the groundwater. The newly installed monitoring wells are numbered MW-201, MW-202, MW-203S, MW-203D, MW-204, MW-205I, and MW-205D; their locations are shown on Figure 2-2.

The monitoring wells were installed according to the procedures presented in the Work Plan and QAPP for the Phase II Remedial Investigation unless otherwise noted.

2.2.1.1 Drilling Method

The boreholes for monitoring wells MW-201S, MW-202, MW-203S, MW-203D, MW-204 were drilled using specially constructed 4¼-inch I.D. (9½-inch OD) boulder hollow stem augers. The boreholes for monitoring wells MW-205I and MW-205D were drilled with standard 4¼-inch hollow stem augers to approximately 35 feet bgl; the rest of each borehole was drilled using the air rotary method. Drilling and well installation were performed in accordance with the procedures described in the Work Plan and QAPP (Malcolm Pirnie, 1995b and 1995a).

Split spoon samples were collected from several of the borings to provide soil for analytical samples, as described in Section 2.1.1, and to provide stratigraphic information. Descriptions of soil characteristics, photoionization detector (PID) readings, and relevant observations of rig behavior (i.e., change in drilling pressure, rig reaction to cobble zones, etc.) noted during drilling were recorded on boring logs. The boring logs are presented in Appendix A.

Monitoring well MW-202 was installed as a "water table" well. Monitoring wells MW-201S, MW-203S, and MW-204 were installed as dual-purpose "water table and SVE" wells. Monitoring

PH2RI.028 02/18/98 02/18 $2-3$

 \cdot :

wells MW-203D, MW-205I, MW-205D were installed as "deep" wells. Well construction information is summarized below and is also presented on the well construction logs which are available in Appendix B.

2.2.1.2 Water Table Monitoring Well Installation

The four water table wells were installed inside or adjacent to the PMC building. The primary purpose of the water table wells was to document the presence and extent of any oils or other light non-aqueous phase liquid (LNAPLs) present at the water table.

The water table wells were constructed of 2-inch I.D., 20-slot, 5-foot long stainless steel screens and 2-inch I.D. PVC risers. The screens were set at depths such that they straddled the water table and the water table was two to three feet below the top of the screen.

2.2.1.3 Soil Vapor Extraction Well Installation

Wells MW-201S, MW-203S, and MW-204S were installed as dual-purpose wells. In addition to the screen straddling the water table as described above, the wells also included 8 to 10 foot long screens placed in the unsaturated zone above the water table. This type of construction allowed the wells to be used as groundwater monitoring wells and as observation wells during SVE tests (utilizing inflatable packers). The SVE portions of the wells were constructed of 2-inch I.D., 20 slot PVC screens. A two-foot long piece of PVC riser was placed between the SVE well screen and the water table screen. Abentonite seal was placed in the annular space adjacent to the two-foot piece of PVC riser to provide a barrier between the water table well and the SVE well

2.2.1.4 Deep Monitoring Well Installation

Monitoring well MW-203D was installed inside the PMC building adjacent to well MW-203S. The well screen was set at 37 to 42 feet bgl, corresponding to the weathered limestone zone (Section 4). This well was installed to evaluate the possible presence of dense non-aqueous phase liquid

MA I \cap V PIRNIE

(DNAPLs) or phase separated contaminants which may have been present within the fractured limestone bedrock.

Monitoring wells MW-205I and MW-205D were installed as a well cluster located southeast of the Ingalls municipal well. The purpose of installing these wells was to assess any vertical hydraulic gradient and to monitor contaminants potentially present in the deeper portion of the aquifer hydraulically upgradient of the Ingalls municipal well. The well screens of monitoring wells MW-2051 and MW-205D were placed at 38 to 43 and 54 to 59 feet bgl, respectively.

The deep monitoring wells were constructed of 2-inch I.D., 20-slot, stainless steel screens and 2-inch I.D. PVC risers.

All water table and deep monitoring wells were secured with either a 4 by 4-inch locking steel above ground protective casing, or a locking J-plug and 9-inch diameter flush-mounted manhole. The protective casings and J-plugs were locked with Master locks, keyed alike.

2.2.2 Groundwater Sampling

Groundwater samples were collected from the Ingalls municipal well and the following 31 monitoring wells located throughout the study area in October, 1995: PS-4, PS-6, PS-IOA, PS-11, PS-12, PS-13, PS-1R, PS-104, PS-105S, PS-105D, PS-106, PS-AS, PS-AD, PS-BS, PS-BD, PS-CS, PS-CD, PS-DS, PS-DD, COP-1, COP-2, COP-3, COP-4, COP-5, MW-201S, MW-202S, MW-203S, MW-203D, MW-204S, MW-205I, and MW-205D. At MDEQ direction, the groundwater samples collected from monitoring wells PS-AS, PS-BS, PS-BD, PS-DS, PS-DD, PS-4, PS-6, PS-12, PS-13, PS-IOA, PS-104, PS-106, and PS-1R, were submitted to US EPA-Central Regional Laboratory (CRL) for low detection limit analysis of VOCs, SVOCs, pesticides, and PCBs. The low detection limits were requested so that the typically low-concentration analytical data could be compared to the low state cleanup criteria concentrations. The groundwater samples were collected according to the procedures described in the Work Plan and QAPP (Malcolm Pimie, 1995b and 1995a).

The groundwater samples collected from the Ingalls municipal well and the other monitoring wells were submitted to USEPA CLP facilities for analysis as follows: Ross Analytical Services, Inc.

 $\omega_{\rm{max}}$

for organic compounds (VOCs, SVOCs, pesticides, PCBs), and Southwest Laboratory of Oklahoma for inorganic compounds (metals, and cyanide).

Additionally, groundwater samples collected from monitoring wells PS-4, PS-104, COP-4, MW-201S, MW-202S, MW-203S, MW-203D and MW-204S, were submitted to ENCOTEC Laboratory for analysis of total petroleum hydrocarbons (TPH) and diesel range organics (DRO) to evaluate the presence and extent of any oils or other free product potentially present at the water table beneath and adjacent to the northwest portion of the PMC building where in 1990, hydraulic fluid reportedly seeped through the building walls.

The groundwater sampling analytical data have been compiled into tables as follows:

- Table 5-13 Volatile Organic Compounds
- Table 5-14 Semi-Volatile Organic Compounds
- Table 5-15 Pesticides and PCBs
- Table 5-16 Inorganic Compounds
- Table 5-17 Tentatively Identified Volatile Organic Compounds

Table 5-18 Tentatively Identified Semi-Volatile Organic Compounds

The laboratory data packages are available in the MDEQ-Superfund project files. The groundwater sampling analytical data are discussed in Section 5.2

2.2.3 Aquifer Testing

2.2.3.1 Water Level Measurements

Water levels were recorded in the monitoring wells (including five City of Petoskey wells), the Ingalls municipal well, and at three surface water measuring locations (two locations on Bear Creek and one location on Lake Michigan) on three occasions: September 25, October 3, and October 16, 1995. The water levels in monitoring wells were measured from the top of the casing (TOC) using an electric water level probe. The measurements at the Ingalls municipal well and the surface water bodies were recorded at pre-marked measurement points. The surface water measuring

locations are indicated on Figure 2-2. The water levels were measured according to the procedures described in the Work Plan and QAPP (Malcolm Pirnie, 1995b and 1995a).

The elevation of the top of casing of each of the new monitoring wells (200 series), the premarked points for the Ingalls municipal well and the northern Bear Creek location, and the TOC of well PS-AS (which had previously been damaged) were surveyed by Jenema Land Surveys of Manistee, Michigan on February 5, 1996. The elevations were referenced to a USGS datum. The benchmark used for the survey was the 'Gas Reset 1984' bronze disk which has an elevation of 592.25 feet above mean sea level, and is located on the north end of the northwest wing of the Petoskey Fire Hall Building on a concrete pad west of the restrooms.

The elevations of the monitoring wells which were installed before 1995 (PS-, COP-, and MW-100 series wells), the southern Bear Creek measuring location, and the Lake Michigan measuring location were referenced in various existing reports, therefore a resurvey was not authorized during the Phase II Remedial Investigation, except for the top of casing of the three monitoring wells (PS-11, PS-104, and MW-105S), which were resurveyed to verify the reported elevations. The resurveyed TOC elevations of these three wells were 0.02 to 0.04 feet greater than the TOC elevations previously reported. Elevation variations of up to 0.04 foot are generally acceptable when surveying across an area the size of this site.

The water level measurements and calculated groundwater and surface water elevations are listed in Table 2-1.

2.2.3.2 Aquifer Pumping Test

A constant rate groundwater pumping test was performed during October 3 through 6, 1995 for the purpose of determining aquifer characteristics. A detailed description of the setup and performance of the pumping test and the analysis of the data is discussed in Section 3.2.

سو

 $\frac{1}{2}$

2.2.3.3 Aquifer Field Permeability (Slug) Tests

Upon analysis of the pumping test data (discussed in Section 3.2), it was determined that fluctuations in Lake Michigan levels affected aquifer levels during the test. Therefore, aquifer characteristics could not be accurately estimated using the pumping test data. MDEQ and Malcolm Pirnie decided to perform slug tests at five wells in order to estimate a range of hydraulic conductivity values for the aquifer.

Slug tests were performed at five monitoring wells (MW-201S, PS-CS, PS-CD, MW-105S, and MW-105D) on April 26, 1996. These monitoring wells were selected to provide a representation of conditions across the site. The slug tests were conducted using an air slug. PVC pipes were used to contain the air slug because the slug testing tool could not be attached to the tops of the wells since the tops of the well riser were not threaded. The slug testing procedure was to 'instantaneously' change the head of the water in the well by introducing compressed air into the well casing. The elapsed time and head change as the water level returned to static conditions were recorded using a pressure transducer and data logger.

The slug test data were analyzed using the Bouwer and Rice method (1976). This method is applicable to fully or partially penetrating wells screened within unconfined aquifers, such as the water table aquifer at the Petoskey Manufacturing site (Section 4.2.), as well as for wells screened in leaky (partially) confined aquifers. The hydraulic conductivities calculated using slug test data are generally representative of the formation in the immediate vicinity of the screened interval of the monitoring well and do not take into account any large scale heterogeneities across the site. Actual hydraulic conductivities may be plus or minus one order of magnitude of the hydraulic conductivities estimated using slug test data. The calculated hydraulic conductivity (K) values are presented in Table 2-2 and discussed in Section 4.1.2. The mean hydraulic conductivities ranged from 7.67 x 10-4 at well MW-105D to 2.11 x 10-3 at well MW-201S, which is typical of limestone, silty sand, and sand. The test data, Bouwer and Rice plots, and the analytical solutions are provided in Appendix C.

3.0 PILOT TEST RESULTS

3.1 SOIL VAPOR EXTRACTION TEST

Two soil vapor extraction (SVE) tests were performed during the period of September 12-15, 1995. The purpose of performing the tests was to develop data which could be used to indirectly evaluate the nature and magnitude of VOC contamination earlier anticipated in the unsaturated soils under the PMC building. The data are also useful in evaluating the effectiveness of using an SVE system for any long-term remediation to be determined by the Feasibility Study.

While the performance of the SVE tests showed that SVE is effective for the physical conditions encountered in the area of concern (under the northwest corner of the PMC building), the applicability and cost-effectiveness of the SVE technology in addressing the relatively low concentrations of VOCs under the building, will be addressed in the Feasibility Study.

3.1.1 Test Set-up

The construction of SVE test wells MW-201S, MW-203S, and MW-204S is described in Section 2.2.1.3. Three temporary two-inch diameter observation points were also set manually, to provide additional shallow soil zone monitoring. Observation points SVE-1 and SVE-2 were set through holes cut into the PMC building floor using a coring machine. These wells were screened from 0.6 to 2.5 feet bgl and 0.6 to 1.5 feet bgl, respectively. Observation point SVE-3 was set outside the PMC building, and was screened from 0.6 to 2.5 feet bgl. All observation points were set at the maximum depth possible and could not be installed manually any deeper due to the presence of cobbles and boulders at 1.5 to 2.5 feet below ground level. The observation points were constructed of $2\frac{1}{2}$ diameter screen and riser with a sand pack around the screened interval which extended several inches above the screen. The remaining annular space was filled with cement. The locations and spacing of the three SVE wells and the three observation points are shown on Figure 3-1.

PH2RI.028 02/18/98 02/18/98 $2420-017-H41$ 3-1

A.

MALCOLM

ф,

 \sim $\mu_{\rm m}$

 $\frac{1}{2}$

. . . .

 \mathbf{r}

During the first SVE test, the vacuum was applied to well MW-203S; during the second test, the vacuum was applied to well MW-201S. Based on evaluation of the data obtained from the tests, it was determined that the radius of influence could be adequately determined. The performance of the third test on well MW-204 would not have contributed additional useful information, because the nearest observation point was 29 feet away and much further than the radius of influence estimated from the first two tests.

During each test, induced vacuums were measured at nearby SVE observation points and SVE wells with magnehelic gauges. Samples of the extracted soil gas were collected hourly during the first four hours of the tests and at regular intervals throughout the duration of the test, following the stabilization of system readings after the first four hours. The soil gas samples were screened in the field for trichloroethene (TCE), which is the compound of concern, using a field gas chromatograph (GC). The extracted soil gas stream was also monitored with a photoionizaton detector (PID) which detected total VOC (TVO) concentrations, at the well head and just prior to entering the blower in the SVE test trailer.

The vapor that was pulled from the extraction well was treated through two 55-gallon granular activated carbon (GAC) canisters attached in sequence (the first canister was the "lead" carbon and the second canister was the "lag" carbon). Summaries of the conditions and results of both SVE tests are presented in Appendix D.

Some water was present in the vapor stream during the tests. To ensure that the induced vacuum was only pulling vapors from the unsaturated zone, an inflatable packer was installed in the well directly above the water table to seal the well. This also reduced the potential for pulling significant quantities of water into the SVE blower.

3.1.2 Radius of Influence

Induced vacuum readings recorded at observation wells during the SVE tests were used to determined the radius of influence that the SVE system was able to form during the tests. The first SVE test (using well MW-203S as the extraction well) was conducted for approximately 48 hours.

MAICOL PIRNIE

The second SVE test (using MW-201S as the extraction well) was conducted for approximately 24 hours. The SVE tests were performed for a length of time sufficient for the readings to stabilize and the radius of influence to be estimated.

During the first test, induced vacuum readings were observed in SVE observation wells and points MW-204S, MW-201S, SVE-1, and SVE-2. These wells were located 12.5 to 40 feet from the extraction well. The only substantial induced vacuum readings were recorded at observation point SVE-1 (located approximately 12.5 feet from the extraction well); the readings ranged from 0.28 to 0.35 inches of water. Induced vacuum readings at the other three observation wells were very low, ranging from 0 to 0.045 inches of water.

The second SVE test was performed using well MW-20 IS (located outside the PMC building) as the extraction well. During this test, no induced vacuum readings were observed at any of the observation points and wells; not even at the closest observation point (SVE-3), which was located approximately 13.5 feet away from the extraction well. The extraction well in this test was located outside the PMC building and therefore, some of the area of influence was not overlain by concrete, as was the case during the first SVE test performed using an extraction well located inside the building. This appears to have affected the radius of influence that could be achieved because air may have been pulled in from the uncovered ground surface.

Based on these results, the radius of influence that was achieved during the first test was estimated at approximately 12.5 feet from the extraction well. However, due to the fractures and other heterogeneities being present in the subsurface, the radius of influence may not be the same in all directions. The fractures and heterogeneities may cause preferential flow pathways that could not be detected by the available observation wells or points. In the vicinity of the SVE test wells, a sand layer is present from the surface to approximately 2.5 feet bgl. Below the sand layer is a layer of boulders and cobbles in a sandy matrix. The differences in the nature of the subsurface soils may affect the observed radius of influence because observation points SVE-1, SVE-2, and SVE-3 were screened in the sand layer while wells MW-201S, MW-203S, and MW-204S were screened in the boulder layer.

PH2RI.028 02/18/98 02/18/98 PH2R1.028
2420-017-H41 3-3

3.1.3 Operating Conditions

The vacuum applied during the first SVE test was approximately 43 inches of water, which produced a linear flow velocity ranging from 4800 to 6200 feet per minute. The applied vacuum during the second SVE test was approximately 43 inches of water which produced an air flow velocity ranging from 5400 to 5600 feet per minute.

The blower discharge temperature ranged from 81.5 to 94.5 degrees Fahrenheit during the tests. The blower discharge pressure reached 6 inches of water.

3.1.4 Vapor Stream TCE and Total VOC Concentrations

TCE and total VOC concentrations in the extracted vapor stream were monitored throughout the tests using a portable GC and PID, respectively. The concentrations of TCE in parts per billion (ppb) are shown in Table 3-1. The PID readings, which represent total VOCs (TVO) in parts per million (ppm), are included with the system monitoring results in Appendix D. During the first test, the TCE concentrations ranged from 2 to 9 ppb and decreased throughout the test. During the second test, the TCE concentrations ranged from 1 to 3 ppb, and again decreased to near nondetectable concentrations.

3.2 AQUIFER PUMPING TEST

A constant rate groundwater pumping test was performed during October 3 through 6, 1995 for the purpose of assessing aquifer characteristics. The description of the setup and performance of the pumping test and analysis of the test data are presented in the following sections of this report.

3.2.1 Test Set-up

A 4-inch diameter groundwater extraction well (PW-201D) was installed on August 22 and 23, 1995 to be used for pumping tests. The well was located such that it could be utilized as part

PH2RI.028 02/18/98 02/18/98 2420-017-H4I 3-4

P.

 \mathbf{v}

of a future groundwater extraction system, if one is installed for remediation (Figure 2-2). The borehole was drilled to a depth of 55 feet bgl using a combination of large diameter (6.25 inch) specially constructed boulder hollow stem augers and air rotary drilling. The well was constructed of a 20-foot long, 30-slot, continuous wound, PVC screen and 4-inch I.D. PVC riser. The screen was set from 35 to 55 feet bgl. The well was sandpacked using coarse sand from the bottom of the screen to three feet above the top of the screen (32 feet bgl). A two-foot thick bentonite seal was set above the sand pack, and the remaining annular space was filled with cement-bentonite grout. An 8-inch diameter flush mount manhole protector was set in concrete at the surface. The well was secured with a watertight *j*-plug and lock. The boring and well construction logs for well PW-201D are presented in Appendices A and B, respectively.

A Grundfos submersible pump was installed in the well, with the intake of the pump set at approximately 50 feet bgl (five feet above the well bottom). Pressure transducers were installed in monitoring wells MW-203S, MW-203D, PS-4, and in the pumping well PW-201D. The transducers were connected to two Hermit data loggers located inside the Petoskey Manufacturing building. Another transducer was installed in well PS-105S from October 2 through October 10, 1995, to collect background water level data. This transducer was connected to a Hermit data logger located near the well. Initial test and transducer parameters were entered into the data loggers prior to the start of the pumping test. The data loggers were set up to record water levels in the instrumented wells on a logarithmic time scale.

One "baseline" set of water levels was obtained manually using an electric water level indicator in the monitoring wells and the pumping well for comparative purposes. In addition, water levels were measured at the three surface water measuring points: one located on the breakwater in Lake Michigan and two (C-l and C-2) located on Bear Creek (Figure 2-2). These measurements were used to evaluate fluctuations in lake and creek water levels.

Two granular activated carbon (GAC) treatment units, containing 2,000 pounds of GAC each, were set up on-site in series to treat the groundwater discharged from the pumping well. A discharge

PH2RI.028 02/18/98 2420-017-H41 3-5

IAI COI

line was run from the second GAC unit to the sanitary sewer located approximately 200 feet southwest of pumping well PW-201D.

Prior to performing the constant rate pumping test, a step test was performed to evaluate drawdown at various pumping rates. Initially, a pump rated for a maximum pumping rate of 105 gpm was used. This pump proved to be too large and quickly drew down the water level in the pumping well to the pump intake. The large pump was replaced with a smaller pump with an operating range of 20 to 50 gpm. Pumping rates (steps) of 25,35, and 45 gpm were evaluated. Thirty-five gpm was determined to be the maximum sustainable pumping rate.

3.2.2 Test Implementation

The test was initiated at 4:10 pm on October 3, 1995. The pump was shut off at 2:05 pm on October 6, 1995. The pumping test was conducted for a total of 69 hours and 54 minutes at a constant pumping rate of 35 gpm.

Water level measurements were recorded automatically by the data loggers in monitoring wells MW-203S, MW-203D, PS-4, background well PS-105S, and in pumping well PW-201D. An electric water level indicator was used to measure water levels in other selected monitoring wells and surface water monitoring points during the test.

During the test, samples were collected from the influent groundwater (i.e., pre-treatment prior to entering the GAC units) and from the effluent (i.e., post-treatment after leaving the GAC units) at numerous intervals. These samples were screened in the field for 1,2-Dichloroethene (1,2 DCE) and TCE using a portable GC. The field screening results are summarized in Table 3-2. The data confirmed that there was no breakthrough of 1,2-DCE or TCE during the pumping test.

Just prior to shutting off the pump, a complete set of water levels were measured in the monitoring wells and at the surface water measuring points. Before the pump was shut off, the data loggers were set up to record recovery in the wells. At the same time as the pump was shut off, the data loggers were started and a recovery test was run. During the recovery test, water levels were measured automatically in wells MW-203S, MW-203D, PS-4, background well PS-1055, and

PH2RI.028 02/18/98 02/18/98 2420-017-H41 3-6

pumping well PW-201 by the data loggers, and in select additional wells using a water level probe. The data logger files for the step, constant, and recovery phases of the test, water level measurement data collected during the test, and elapsed time vs. drawdown curves are included in Appendix E.

3.2.3 Observations / Data Trends

Well response curves for several of the monitoring wells located near pumping well PW-201 were constructed by plotting drawdown (feet) versus elapsed time (min.). These curves were used to evaluate the aquifer response to pumping; they are included in Appendix E. As indicated by the well response curves, water levels in these wells fluctuated up and down throughout the test even though a steady 35 gpm pumping rate was maintained at the pumping well. Based on an evaluation of the change in water level in the wells and the change in Lake Michigan lake level, there appears to be a high degree of influence of lake level on the water level in the monitoring wells.

Water levels in the monitoring wells either dropped or showed no change for the first six to seven minutes of the test. After this, water levels tended to rise until approximately 800 to 900 minutes into the test. During this time, the level of Lake Michigan also rose. From about 900 to 2,700 minutes into the test, the water levels in the monitoring wells dropped, as did the water level in Lake Michigan. The lowest water levels in the wells and in Lake Michigan were recorded from approximately 2,000 to 2,700 minutes into the test. From approximately 2,700 minutes until the end of the test (4,194 minutes elapsed time), the water levels in the wells and in the lake rose.

Figure 3-2 is a plot of elapsed time vs. drawdown in the monitoring wells and Lake Michigan. During the pumping test, the change of water levels in the monitoring wells in general mimicked the change in Lake Michigan water level (i.e., as the lake level rose, the water level in the monitoring wells also rose).

The water levels in a few of the deep wells closest to the pumping well (PS-AD, PS-BD, PS-104, and MW-203D) appeared to have been drawn down during the test, while water levels in the shallow wells closest to the pumping well were not drawn down substantially as shown on Figure 3-2. It is possible that the screens of these wells were not in direct communication with the deeper wells

 $\bar{\mathcal{A}}$

 \ddotsc

due to the presence of silty or clayey lenses and/or clay-filled voids/fractures in the aquifer. These zones may essentially act as a barrier to vertical hydraulic communication in the aquifer. This may cause the aquifer to behave as a leaky confined aquifer in the deeper zones. The presence of silt and/or clay was observed in several locations during the drilling of the monitoring wells.

Two weeks after the pumping test, a transducer was placed in the Ingalls municipal well for approximately 25 hours to record water level fluctuations. Over the 25-hour period, the fluctuations in water level in the Ingalls well were of the same order of magnitude as the drawdown caused by pumping well PW-201D during the pumping test. Figure 3-4 shows the substantial fluctuations of the water levels in the Ingalls well which is in direct communication with Lake Michigan due to its proximity to the lake and the nature of the soils and bedrock in that area. The fluctuations in lake level seems to have caused larger changes in water level elevation in the wells than could be induced by pumping PW-201D. Since the lake level fluctuations "mask" the drawdown data, the time vs. drawdown data cannot be used to accurately estimate aquifer parameters.

3.2.4 Supplemental Water Level Measurements

The water level in background observation well PS-105S fluctuated approximately 0.8 feet from October 2 through October 10, 1995 (Figure 3-3). The changes in water level in well PS-105S mimicked the changes in Lake Michigan lake level during the period of the pumping test.

The water level in the Ingalls municipal well, which is located outside the zone of influence of the pumping test well, fluctuates depending on pumping cycles. It fluctuated rapidly over a 0.45 ft. range throughout the day it was monitored frequently (October 16, 1995) (Figure 3-4). This variation in water level is the result of production pumping at this well.

3.2.5 Surface Water Measurements

Barometric pressure appears to have a rapid effect on Lake Michigan's water level as shown on Figure 3-5. Generally, as barometric pressure decreases the lake level increases, and as barometric pressure increases lake level decreases.

PH2RI.028 02/18/98 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 02:00 0 2420-017-H41 3-8

Ħ

IALCOLM PIRNIE

Changes in water level elevation as measured at the Lake Michigan and two Bear Creek measuring points during the period of the pumping test are shown on Figure 3-6. Lake Michigan lake level and the water level elevation measured at the northern Bear Creek water measuring point (C-l), located below the dam, appeared to fluctuate in a similar manner, indicating that the lake level fluctuation extends as far south in the creek as measuring point C-1. The water level at the southern Bear Creek measuring point (C-2) located above the dam, varied only slightly (≤ 0.08 ft.) during the period of the pumping test. This is representative of more stable water conditions along the southeastern portion of the aquifer, due to the presence of the dam.

 \ddotsc

 $\overline{}$ $\frac{1}{\sqrt{2}}$

. =

4.0 SITE GEOLOGY AND HYDROGEOLOGY

4.1 SITE GEOLOGY

The stratigraphy at the site was interpreted from information obtained from the borings drilled during this phase of the RI, logs from borings previously drilled at the site, and local water well logs.

The unconsolidated deposits at the site range in thickness from approximately 5 to 45 feet. These deposits consist of up to 6 feet of sand overlying a layer of large limestone boulders and cobbles in a clayey, silty, and/or sandy matrix. The limestone fragments vary from a few inches to 10 to 15 feet in diameter. Immediately below this boulder and cobble layer is the limestone bedrock which is part of the Devonian age Traverse Group. The upper portion of the limestone bedrock is highly weathered. The interfaces between the limestone cobbles and weathered bedrock and between the weathered bedrock and competent bedrock are extremely variable along the shore of Lake Michigan in the vicinity of the site, and often difficult to determine.

4.2 SITE HYDROGEOLOGY

The main surface water bodies in the vicinity of the site are Lake Michigan, located at the northern edge of the site, and Bear Creek, which runs roughly north-south and is located approximately 500 feet east of the PMC building.

A single shallow unconfmed aquifer, corresponding to the boulder/cobble layer and the limestone bedrock, as described above, was confirmed during this investigation. Groundwater at the site is typically first present at a depth of approximately 8 to 19 feet bgl.

The hydraulic conductivities (K) calculated from slug test data collected at the site are shown in Table 2-2. The mean hydraulic conductivities ranged from 7.67×10^{-4} at well MW-105D to 2.11 x 10-3 at well MW-201S, which is typical of aquifers of limestone, silty sand, and sand.

MAICOLM P1RNIE

Evaluation of data collected during the pumping test indicates that the water level of Lake Michigan exerts a high degree of influence on the water levels recorded in the monitoring wells. During the pumping test, water levels in the monitoring wells located near the pumping well fluctuated up and down even though a constant 35 gpm pumping rate was maintained in the pumping well. Figure 3-2 is a drawdown vs. elapsed time plot of the water levels in the monitoring wells and in Lake Michigan collected during the pumping test. A strong correlation can be seen between fluctuations in lake level and water levels in monitoring wells.

Changes in barometric pressure appear to have an almost immediate effect on the water level in Lake Michigan as shown on Figure 3-5. As barometric pressure decreases, the lake level increases, and as barometric pressure increases, the lake level decreases.

Changes in water level elevation, as measured at the Lake Michigan and two Bear Creek measuring points during the period of the pumping test, are shown on Figure 3-6. Lake Michigan lake level and the water level elevation measured at the northern Bear Creek water measuring point (C-l), located below the dam, appeared to fluctuate in a similar manner, indicating that the lake level fluctuation extends as far south in the creek as measuring point C-1. The water level at the southern Bear Creek measuring point (C-2) located just above the dam, varied only slightly (≤ 0.08 ft.) during the period of the pumping test. This variation is representative of more stable water conditions along the southeastern portion of the aquifer, due to the presence of the dam.

Local groundwater flow is heavily influenced by changes in lake level. In general, _ groundwater flows from the highlands toward the lake, but in the beach shelf between the bluff and the lake, where the site is located, water levels are approximately the same as the lake level. There is a lag time associated with the aquifer response to changes in the lake level resulting in local reversals of the flow direction. When the lake is at low ebb, groundwater flow is toward the lake. As the lake level rises, the lake elevation becomes higher than the groundwater elevation in the aquifer and lake water flows into the aquifer (away from the lake). The resulting head change is propagated through the aquifer at a rate controlled by the hydraulic conductivity. This change results in a situation where groundwater near the bluff flows northward toward the lake, while groundwater

PH2RI.028 02/18/98 $2420-017-H41$ $4-2$

near the shore flows southward toward the bluff. There is a theoretical stagnation line separating these two flow patterns, where the horizontal gradient is zero and no flow occurs. As the head change in response to rising lake levels is propagated through the aquifer, the stagnation line moves southward toward the bluff. When the lake level falls, the stagnation line moves northward toward the lake and may disappear if flow toward the lake is reestablished throughout the entire aquifer. Review of historical water level records indicates that the overall groundwater flow from the PMC facility is slightly towards the northwest, including western and northern flow components. Both previous and current water levels show that the horizontal gradient across the site is extremely low (flat).

Groundwater flow at the site is also controlled by the voids between limestone boulders and by fractures in the limestone bedrock. Groundwater flow through fractures near the Ingalls well appears more pronounced, however it is irregular due to the periodic pumping.

As a result of these conditions, equilibrium conditions that are the basis for 'static' water level measurements could not be depicted graphically with the data available in this phase of the RI. These conditions are in a constant state of flux, and based on the data shown in Figure 3-3, undergo a reversal on a frequent basis. Consequently, an equipotential map describing static conditions during the Phase II RI is not a valid concept at this site, and cannot be prepared at the scale of the site investigation. Several attempts to develop potentiometric surface maps resulted in inconsistent and variable configurations based on contour intervals of only few hundreds of a foot. Mapping at a scale that compares groundwater elevations south of the bluff to lake elevations may be valid, but such a map is not useful for the estimation of local gradients or flow velocities at the site. Groundwater elevations measured on several occasions are included in Table 2-1. Vertical hydraulic gradients were calculated at the well clusters using the formula:

$$
I_{\mathbf{v}} = \Delta \mathbf{h} / \Delta \mathbf{d}
$$

where: I_v = vertical hydraulic gradient.

 Δh = head difference between the water elevation in two wells.

 Δd = distance between the bottom of the two well screens.

PH2RI.028 02/18/98 02/18 $2420-017-H41$ $4-3$
MALCOLM PIRNIE

 \sim \sim

 $\overline{}$

 $\overline{}$

 $\frac{1}{2}$

The results were as follows:

Generally, there is a slight upward gradient in the northern and western portions of the site and a slight downward gradient in the central and eastern portions of the site. The strongest vertical gradient calculated is between wells PS-CS and MW-105D, located next to each other, where the screen separation is the greatest, indicating a strong upward vertical groundwater component which weakens closer to the water table.

5.0 SITE CONTAMINATION CHARACTERIZATION

Soil and groundwater samples were collected and analyzed during both phases of the Remedial Investigations in order to assess the nature and extent of contamination at the site. This section describes soil analytical data obtained from the Phase I RI, supplemented by data obtained during the Phase II RI. The groundwater contamination characterization is based on the most current groundwater analytical data obtained during the Phase II RI.

5.1 EVALUATION OF SOIL ANALYTICAL DATA

5.1.1 Evaluation Criteria

The soil analytical data obtained from the Phase I and II RIs were compared to several applicable cleanup criteria established by the State of Michigan under Part 201, Environmental Remediation, of Act 451, Natural Resources and Environmental Protection Act (PA 1995, as amended). The criteria used for this comparison are:

- Generic Residential Cleanup Criteria (GRCC)
- Groundwater/Surface Water Interface (GSI) Criteria
- Generic Industrial Cleanup Criteria
- Residential Direct Contact Cleanup Criteria
- Industrial Direct Contact Cleanup Criteria
- Generic Inhalation Criteria for Ambient Air

The applicable cleanup criteria for the compounds detected in the soil samples are presented in the soil analytical data tables.

5.1.1.1 Determination of Generic Residential Cleanup Criteria

The GRCC were established by using either the Health-Based or Aesthetic Criteria (MERA Operational Memorandum 8, Revision 4, June 5, 1995), the Soil/Water Partitioning (SWP) Drinking

PH2RI.028 02/18/98 02/18 2420-017-H41 5-1

ţ

$MAICO$ PIRNIE

Water Criteria (Addendum to MERA Operational Memorandum 8, Revision 4, January 17, 1997), the State of Michigan Default Background Concentrations (MERA Operational Memorandum 15, September 30, 1993), or the Site-Specific Calculated Background Concentrations (Table 5-1).

The determination of which Residential Cleanup Criteria are used to evaluate the concentrations of compounds begins by using the most restrictive of the 20X Residential Health-Based and 20X Aesthetic Criteria. Residential Cleanup Criteria are representative of the acceptable Health-Based criteria and 20X the corresponding Groundwater Criteria that are considered protective of groundwater. The most restrictive criteria are then compared to SWP Drinking Water Criteria. The least restrictive criteria are then used as the applicable cleanup criteria.

MERA Operational Memorandum 8, Revision 4, June 5, 1995 allows Background Concentrations (State of Michigan or Site-Specific) for selected inorganic compounds to be used as Residential Cleanup Criteria if such concentrations are higher (less restrictive) than the Residential Cleanup Criteria. If the calculated cleanup criteria are lower (more restrictive) than the target method detection limits (MDLs), the MDLs become the residential cleanup criteria. In cases where a compound is not expected to leach, the Direct Contact Values are used. However, if it appears that a compound may be leaching through the soil, then the cleanup criteria are determined by utilizing the SWP or 20X the more restrictive of the Health-Based or Aesthetic Drinking Water Criteria.

5.1.1.2 Determination of Groundwater/Surface Water Interface Criteria

The 20X GSI criteria are soil criteria protective of surface water. GSI criteria were developed to address risks associated with groundwater discharging to a surface water body, which may or may not be used as a drinking water source. The GSI criteria used for comparison of soil data at this site apply to surface waters not protected as a drinking water source, because Lake Michigan is not a drinking water source for the City of Petoskey. It is not necessary that 20X GSI cleanup criteria in the soil be met, as long as the GSI values are not exceeded at the appropriate compliance points (monitoring wells near Lake Michigan).

PH2RI.028 02/18/98 02/18/98 2420-017-H41 5-2

The Contract of Security

The GSI Criteria are described in Addendum to MERA Operational Memorandum 8, Revision 4, and Operational Memorandum 14, Revision 2, dated November 3, 1997. The higher (least restrictive) of the soil 20X GSI criteria or the soil GSI SWP criteria (soil criteria protective of groundwater discharging to the surface water) were compared to the site soil data to ensure that groundwater concentrations did not exceed the GSI criteria. The GSI values were recently updated as part of new administrative rules for Part 31, of Act 451, as amended. However, as of December 10, 1997, the list of GSI values was still being updated. Therefore, the GSI values listed in MERA Operational Memorandum 8, Revision 4 dated June 5, 1995 were used to evaluate compounds for which new GSI criteria are not yet available.

5.1.1.3 Determination of Industrial Qeanup Criteria

The Industrial Cleanup Criteria were determined by using either the 20X Industrial Health-Based or 20X Aesthetic Groundwater Criteria (MERA Operational Memorandum 14, Revision 2, June 6, 1995), the Soil/Water Partitioning (SWP) Industrial Drinking Water Criteria (criteria are currently under State review), the State of Michigan Default Background Concentrations (MERA Operational Memorandum 15, September 30, 1993), or the Site-Specific Calculated Background Concentrations.

The determination of which criteria are used to evaluate specific compounds in soils begins by using the most restrictive of the 20 X Industrial Health-Based and 20X Aesthetic Cleanup Criteria. The most restrictive criteria are then compared to SWP Industrial Drinking Water Criteria. The higher (least restrictive) criteria are then used as the applicable cleanup criteria. MERA Operational Memorandum 14, Revision 2, June 6, 1995 allows the use of Background Concentrations (State of Michigan or Site-Specific) for selected inorganic compounds, if the Background concentrations are higher than the criteria determined using the method discussed above.

In cases where a compound is not expected to leach, the Direct Contact Values are used. However, if evidence indicates that a compound may be leaching through the soil, then the cleanup

MAIC PIRNIE

criteria is determined by using 20X the more restrictive of the Industrial Health-Based or Aesthetic Drinking Water Cleanup Criteria.

5.1.1.4 Determination of Direct Contact Value Criteria

Residential and Industrial Direct Contact Criteria were also used to evaluate the soil analytical data because of the potential presence of soil contact pathways. These criteria were obtained from MERA Operational Memorandum 8, Revision 4, June 5, 1995 and MERA Operational Memorandum 14, Revision 2, June 6, 1995, respectively.

5.1.1.5 Determination of Generic Soil Inhalation Criteria for Ambient Air

Generic soil inhalation criteria for ambient air was addressed in a MDEQ Addendum to Interim Operational Memorandum #8, Revision 4 and #14, Revision 2 dated April 29, 1997. These generic soil inhalation criteria were developed for residential and industrial/commercial scenaria to assess the potential for human health effects from long-term exposure to airborne soil contaminants in ambient air.

The detected concentrations of contaminants in the site soils were compared to this set of cleanup criteria. None of the detected compounds were present in concentrations that exceeded the residential and industrial/commercial generic soil inhalation criteria.

5.1.2 Evaluation of Soil Analytical Data

Soil samples were collected from the site in 1992 as part of the Phase 1RI and in 1995 as part of the Phase II RI. For the purpose of the following discussion both sets of soil analytical data were reviewed.

Soil samples were collected from locations SS-1 through SS-6, SB-1 through SB-12, and B-l through B-4 in September 1992. The designation "SS" refers to surficial soil samples (<1 foot), while designations "SB" and "B" refer to subsurface soil sampling (>1 foot). The remaining soil samples were collected in August 1995. The soil sampling locations are shown on Figure 2-1. The soil

analytical data are presented by major analytical group (i.e., volatile organic compounds, semi-volatile organic compounds, PCB/Pesticides and inorganic compounds). The soil analytical data are shown on Figures 5-2 through 5-12.

5.1.2.1 Volatile Organic Compounds

The concentrations of the following volatile organic compounds were detected below the applicable GRCC, GSI Criteria and Industrial Cleanup Criteria; the concentration ranges are shown in parentheses: tetrachloroethane (1 to 50 ug/kg); 1,2-dichloroethene (3 to 40 ug/kg); benzene (1 ug/kg); toluene (3 to 70 ug/kg); ethyl benzene (2 to 44 ug/kg); xylene (2 to 240 ug/kg); methylene chloride (4 to 50 μ g/kg); and acetone (10 to 46 μ g/kg).

Trichloroethene (TCE) was detected in samples at concentrations ranging from 1 to 830 ug/kg. Concentrations of TCE in the soil exceeded both the Residential and Industrial 20X Drinking Water Criteria of 100 ug/kg at soil borings SB-1 at 14.5 to 16.5 feet (280 ug/kg); at boring SB-201S at 0 to 2 feet (460 ug/kg) and at 14 to 16 feet (310 ug/kg); at boring SB-203S at 12 to 14 feet (830 μ g/kg); and at boring SB-204S at 13 to 15 feet (130 μ g/kg).

The locations where the concentrations of TCE in the soil exceeded the 20X Drinking Water Residential and Industrial Cleanup Criterion of 100 μ g/kg were generally adjacent to the northwest corner of the PMC building or in the capillary zone adjacent to or underneath the PMC building.

The Phase II August 1995 soil sampling VOC analytical data and criteria comparisons are presented in Table 5-2. The Phase I surface and subsurface VOC soil sampling analytical data and criteria comparisons are presented in Tables 5-8 and 5-10, respectively. The VOCs whose concentration exceeded the Generic Residential Cleanup Criteria, Generic Industrial Cleanup Criteria, and GSI criteria in the Phase II and Phase I soil samples are shown on Figures 5-1, 5-2, and 5-3, respectively.

Phase Π tentatively identified compounds (TICs) were present in soil samples collected from background boring locations (borings SB-206 and SB-207). The Phase II TIC analytical data have been compiled and are presented in Table 5-6. TICs were present in boring SB-206 (0.5 to 2.5 foot

PH2RI.028 02/18/98 02/18/98 2420-017-H41 5-5

MALCOLM
PIRNIE

 $\frac{1}{\sqrt{2}}$

bgl), and in boring SB-207 (0.5 to 2.5 foot bgl and 2.5 to 4.5 foot bgl samples). No conclusions may be drawn from the pattern of these TIC occurrences.

5.1.2.2 Semi-Volatile Organic Compounds

The concentrations of the following semi-volatile organic compounds were detected below the applicable GRCC, GSI Criteria and Industrial Cleanup Criteria in soil samples collected at the site; their concentration ranges are shown in parentheses: fluorene (120 to 7,100 ug/kg); anthracene (32 to 9.400 ug/kg); butyl benzyl phthalate (150 to 550 ug/kg); chrysene (29 to 23.000 ug/kg); indeno(1,2,3-cd)pyrene (43 to 13,000 μ g/kg); benzo(ghi)perylene (41 to 12,000 μ g/kg); di-n-butyl phthalate (82 to 360 ug/kg); dibenzofuran (23 to 3,900 ug/kg); one detection of naphthalene (120 μ g/kg); one detection of 2-methylnaphthalene (75 μ g/kg); pyrene (36 to 31,000 μ g/kg); one detection of di-n-octyl phthalate (3,200 ug/kg); and acenaphthylene (380 to 730 ug/kg).

Phenanthrene was detected in soil samples in concentrations ranging from 59 to 46,000 ug/kg. Phenanthrene exceeds the Residential, 20X GSI and Industrial Criteria of 1,100 μ g/kg, 12,000 ug/kg, and 34,000 ug/kg respectively, at soil boring SS-6 (46,000 ug/kg). In addition, phenanthrene exceeds the 20X GSI criterion of 1,100 ug/kg at soil borings SS-2 (2,500 ug/kg); SB-4 at 0-2' (2,300 ug/kg); and SB-9 at 2 to 4 feet (2,000 ug/kg). Deeper soil samples collected at the same boring locations did not contain detectable concentrations of phenanthrene, indicating that it is not leaching through the soil.

Acenaphthene was detected in soil samples at concentration ranges of 140 to 6,600 ug/kg with one exceedence of the GSI criteria of 4,300 ug/kg at soil boring SS-6 (6,600 ug/kg).

Benzo(a)anthracene was detected in soil samples at concentration ranges of 34 to 23,000 ug/kg with one exceedence of the Residential Cleanup Criterion of 14,000 μ g/kg at soil boring SS-6 $(23,000 \mu g/kg)$.

Benzo(a)pyrene was detected in soil samples at concentration ranges of 120 to 18,000 μ g/kg with one exceedence of the Residential Cleanup Criterion of 1,400 ug/kg at soil boring SS-6 (18,000) μ g/kg).

Benzo(b)fluoranthene was detected in soil samples at concentration ranges of 5 1 to 3 1,000 μ g/kg with one exceedence of the Residential Cleanup Criterion of 14,000 μ g/kg at soil boring SS-6 $(31,000 \mu/kg)$.

Bis (2-ethylexyl phthalate) was detected in soil samples at concentration ranges of 26 to 5,100 μ g/kg with exceedences above the **Residential and Industrial Criteria of 120** μ g/kg at soil borings SB-203S at 5 to 7 feet (140 ug/kg); SS-5 (5,100 ug/kg); SB-1 at 4 to 6 feet (640 ug/kg); SB-1 at 14.5 to 16.5 feet (1,800 μ g/kg); and SB-5 at 2 to 5 feet (4,300 μ g/kg).

Fluoranthene was detected in soil samples at concentration ranges of 28 to 50,000 μ g/kg with one exceedence of 20X GSI Criterion of 7,400 μ g/kg at soil boring SS-6 (50,000 μ g/kg).

Carbazole was detected in soil samples at concentration ranges of 160 to 7,800 μ g/kg with one excedence of the Residential Criterion of 860 μ g/kg at soil boring SS-6 (7,800 μ g/kg).

Dibenzo(a,h)anthracene was detected in soil samples at concentrations ranging from 110 to 7900 μ g/kg with one exceedence of the Residential Criterion of 1400 μ g/kg at soil boring SS-6 (7900 ug/kg).

The Phase II SVOC soil analytical data and comparisons to cleanup criteria are presented in Table 5-3. The Phase I SVOC surface and subsurface soil analytical data and criteria comparisons can be found in Tables 5-8 and 5-11, respectively. The SVOC compounds whose concentrations exceed cleanup criteria are shown on Figures 5-1, 5-2 and 5-3.

Tentatively identified compounds (TICs) were present in soil samples collected from all onsite (borings SB-201, SB-202, SB-203, and SB-204) and background (SB-206 and SB-207) boring locations. While conclusions concerning the presence of TICs cannot be drawn, the majority of the TICs were found at highest concentrations in borings outside the PMC building, primarily at the northeast corner (at boring location SB-202) at all sampled depths at decreasing frequency.

PH2RI.028 02/18/98 02/18/98 2420-017-H41 5-7

MAICO M P1RNIE

10、 10、 10、 10、 10、 10

i.

 \sim , \sim $\mathcal{A}^{\mathcal{A}}$

Numerous TICs were identified at both background soil boring locations (SB-206 and SB-207) at increasing frequency and concentration with depth. This data confirms the widespread occurrence of TICs observed during the Phase I Remedial Investigation (including TICs at background boring locations PS-12, B-l, and B-2). The TICs have been compiled and are presented in Table 5-7. Appendix C of the Phase I RI report lists TICs detected in soil samples collected during the Phase I RI. Most of the TICs have not been identified and are listed as "unknowns". Estimated concentrations are listed for both known and "unknown" TICs.

5.1.2.3 Pesticides and PCBs

The following pesticides and PCBs were detected at concentration below the applicable GRCC, GSI Criteria and Industrial Cleanup in soil samples collected at the site; their concentration ranges are identified in parentheses: aldrin (1.0 to 2.0 μ g/kg); one detection of alpha chlordane (0.91 μ g/kg); and endosulfan I and II (2.9 to 8.2 μ g/kg).

The Phase II pesticide and PCB soil sampling analytical data and criteria comparisons are presented in Table 5-4. The Phase I pesticide and PCB soil sampling analytical data can be found in Appendix C of Eder's RI Report (Eder, 1993).

Only 4,4'-DDT was present in surficial sample SS-5, at concentration (92 μ g/kg) exceeding the Residential Cleanup Criterion of 50 ug/kg.

5.1.2.4 Inorganic Compounds

Local background concentrations were calculated for all relevant inorganic compounds. The calculations were performed in accordance with MDEQ's "Guidance Document for Verification of Soil Remediation" (MDEQ, 1994). Acceptable background limits were calculated for soils using soil samples B-l (1 to 3 feet), B-2 (1 to 3 feet), SB-206 (0.5 to 2.5 feet), SB-206 (2.5 to 4.5 feet), SB-207 (0.5 to 2.5 feet) and SB-207 (2.5 to 4.5 feet). The background concentration calculations are presented in Table 5-1.

M

The following inorganic compounds were detected at concentration below the applicable GRCC, GSI and Industrial Cleanup Criteria in soil samples collected at the site; concentration ranges are identified in parentheses: aluminum (902 to 6090 mg/kg); antimony (2.8 to 15 mg/kg); arsenic (0.7 to 14 mg/kg); beryllium (0.13 to 2.50 mg/kg); cobalt (0.76 to 3.5 mg/kg); copper (0.87 to 39 mg/kg); iron (1460 to 15,300 mg/kg); manganese (25.9 to 293 mg/kg); nickel (1.30 to 35.5 mg/kg); sodium (32.8 to 419 mg/kg); one detection of thallium (0.68 mg/kg); and vanadium (2.5 to 16.8 mg/kg).

Barium was detected in soil samples at concentrations ranging from 4.3 to 305 mg/kg with exceedences above the GSI criteria of 120 mg/kg at soil borings $SB-201S$ at 0 to 2 feet (141 mg/kg) and SB-11 (305 mg/kg).

Cadmium was detected in soil samples at concentrations ranging from 0.34 to 28.9 mg/kg with exceedences above the Residential and Industrial Cleanup Criteria of 6 mg/kg and the GSI criteria of 4.3 mg/kg at soil borings SB-4 at 0 to 2 feet (8.5 mg/kg) and SS-1 (28.9 mg/kg). The cadmium concentration in sample boring SB-5 (4.4 mg/kg) exceeds the GSI criteria.

Chromium was detected in soil samples at concentrations ranging from 1.1 to 27.4 mg/kg with exceedences of the GSI criterion of 3.4 mg/kg at soil borings SB-201S at 0 to 2 feet (16.3) mg/kg); SB-202S at 0 to 2 feet (6.0mg/kg); SB-203D at 0 to 2 feet (3.5 mg/kg) and 5 to 7 feet (7.7 mg/kg); SB-204S at 0 to 2 feet (4.2 mg/kg); SB-3 at 6 to 7 feet (5.4 mg/kg); SB-4 at 0 to 2 feet (6. 1 mg/kg) and in the duplicate (5.5 mg/kg); SB-5 at 2 to 5 feet (19.8 mg/kg); SB-6 at 0 to 2 feet (8.4 mg/kg); SB-11 at 1 to 3 feet (9.4 mg/kg); SS-1 (27.4 mg/kg); SS-2 (3.8 mg/kg); SS-3 (5.1 mg/kg); SS-4 (3.8 mg/kg); SS-5 (12.7 mg/kg); and SS-6 (10.6 mg.kg).

Lead was detected in soil samples at concentrations ranging from 1.1 to 306 mg/kg with exceedences of the Residential, Industrial, and GSI criteria at soil borings SB-201S at 0 to 2 feet (306 mg/kg); SS-1 (236 mg/kg); SB-5 at 2 to 5 feet (185 mg/kg); and SB-11 at 1 to 3 feet (199.2) mg/kg).

Magnesium was detected in soil samples at concentrations ranging from 417 to 54,900 mg/kg. Magnesium exceeds the GSI criteria of 1,000 mg/kg at soil borings SB-201S at 0-2' (53 10

PH2RI.028 02/18/98 02/18/98 2420-017-H41 5-9

 $\mathbb{R}^{\mathbb{Z}}$

 $\mathbb{Z}^{\mathbb{Z}}$ $\begin{array}{c} \begin{array}{c} \bullet \\ \bullet \end{array} \end{array}$

> \mathcal{L} 车

 \mathbf{A}

mg/kg); SB-202S at 0 to 2 feet (9820 mg/kg) and at 10 to 12 feet (32,900 mg/kg); SB-203D at 0 to 2 feei (1,370 mg/kg) and at 5 to 7 feet (14,800 mg/kg); SB-204S at 0 to 2 feet (1,350 mg/kg); SB-206 at 2.5 to 4.5 feet (1,910 mg/kg); SS-1 (12,300 mg/kg); SS-2 (4,330 mg/kg); SS-3 (6,620 mg/kg); SS-4 (2,810 mg/kg) and the duplicate (15,900 mg/kg); SS-6 (11,500 mg/kg); SB-1 at 4 to 6 feet $(6,230 \text{ mg/kg})$ and 14.5 to 16.5 feet (20,200 mg/kg); SB-2 at 0 to 2 feet (6,170 mg/kg) and 6 to 9 feet (15,400 mg/kg); SB-3 at 6 to 7 feet (5,840 mg/kg); SB-4 at 0 to 2 feet (6,860 mg/kg), the duplicate (7,890 mg/kg) and 2 to 6 feet (54,900 mg/kg); SB-5 at 2 to 5 feet (21,800 mg/kg) and 10 to 13 feet (15,000 mg/kg); SB-6 at 0 to 2 feet (5,050 mg/kg) and 6 to 10 feet (22,300 mg/kg); SB-7 at 2 to 6 feet (12,100 mg/kg) and 10 to 14 feet (22,100 mg/kg); SB-8 at 4 to 8 feet (21,700 mg/kg) and 8 to 11 feet (22,000 mg/kg); SB-9 at 2 to 4 feet (30,900 mg/kg) and 5 to 8 feet (19,900 mg/kg); SB-10 at 1 to 5 feet (19,200 mg/kg), the duplicate (23,000 mg/kg) and 5 to 8 feet (24,200 mg/kg); SB-11 at 1 to 3 feet (3,310 mg/kg); and SB-12 at 1 to 3 feet (17,000 mg/kg) and 4 to 8 feet (36,600 mg/kg). Magnesium exceeds the Residential Cleanup Criterion of 15,577 mg/kg at soil borings SB-202S at 10 to 12 feet (32,900 mg/kg); duplicate SS-4 (15,900 mg/kg); SB-1 at 4 to 6 feet (6,230 mg/kg); SB-5 at 2 to 5 feet (21,800 mg/kg); SB-7 at 10 to 14 feet (22,100 mg/kg); SB-4 at 2 to 6 feet (54,900 mg/kg); SB-6 at 6 to 10 feet (22,300 mg/kg); SB-8 at 4 to 8 feet (21,700 mg/kg) and 8 to 11 feet (22,000 mg/kg); SB-9 at 2 to 4 feet (30,900 mg/kg) and 5 to 8 feet (19,900 mg/kg); SB-10 at 1 to 5 feet (19,200 mg/kg), the duplicate (23,000 mg/kg) and 5 to 8 feet (24,200 mg/kg); and SB-12 at 1 to 3 feet (17,000 mg/kg) and 4 to 8 feet (36,600 mg/kg). Magnesium exceeds the Industrial Cleanup Criterion of 24,000 mg/kg at soil borings SB-202S at 10 to 12 feet (32,900 mg/kg); SB-4 at 2 to 6 feet (54,900 mg/kg); SB-9 at 2 to 4 feet (30,900 mg/kg); SB-10 at 5 to 8 feet (24,200 mg/kg); and SB-12 at 4 to 8 feet (36,600 mg/kg).

Mercury was detected in soil samples at concentrations ranging from 0.12 to 0.41 mg/kg. Mercury exceeds the GSI criterion of 0.0011 mg/kg at soil borings SB-201S at 0 to 2 feet (0.270) mg/kg); SB-202S at 0 to 2 feet (0.210 mg/kg); SS-5 (0.41 mg/kg); SB-5 at 2 to 5 feet (0.20 mg/kg); SB-6 at 0 to 2 feet (0.12 mg/kg); the duplicate SB-10 at 1 to 5 feet (0.20 mg/kg); and SB-11 at 1 to 3 feet (0.15 mg/kg).

PH2RI.028 02/18/98 2420-017-H4I 5-10

MAICOL PIRNIE

Selenium was detected in soil samples at concentrations ranging from 0.58 to 20.7 mg/kg. Selenium exceeds the Residential and Industrial cleanup criterion of 4.11 mg/kg at soil boring SS-1 (20.7 mg/kg). Selenium exceeds the GSI criterion of 0.410 mg/kg at soil borings SB-206 at 2.5 to 4.5 feet (0.970 mg.kg); SS-1 (20.7 mg/kg); SB-4 at 0 to 2 feet (1.10 mg/kg); SB-5 at 2 to 5 feet (0.58 mg/kg) ; duplicate SB-4 at 0 to 2 feet (0.90 mg/kg) ; and SB-11 at 1 to 3 feet (0.95 mg/kg) .

Silver was detected in soil samples at concentrations ranging from 0.23 to 3.70 mg/kg. Silver exceeds the GSI criterion of 0.0077 mg/kg at soil borings SB-202S at 0 to 2 feet (2 mg/kg); SS-3 (0.23 mg/kg); SS-4 (0.31 mg/kg); SS-5 (3.70 mg/kg); and SS-6 (0.29 mg/kg).

Zinc was detected in soil samples at concentrations ranging from 9 to 19,700 mg/kg. Zinc exceeds the Residential Cleanup Criterion of 2,400 mg/kg at soil borings SB-201S at 0 to 2 feet (3,080 mg/kg); SS-1 (10,900 mg/kg); SS-5 (19,700 mg/kg); SS-6 (9,780 mg/kg); SB-4 at 0 to 2 feet $(3,750 \text{ mg/kg})$ and the duplicate $(3,390 \text{ mg/kg})$; and SB-6 at 0 to 2 feet $(2,940 \text{ mg/kg})$. Zinc also exceeds the Industrial Cleanup Criterion of 5,000 mg/kg at soil borings SS-1, SS-5 and SS-6. Zinc exceeds the GSI criterion of 190 mg/kg at soil borings SB-201S at 0 to 2 feet (3,080 mg/kg); SB-202S at 0 to 2 feet (2,270 mg/kg); SS-1 (10,900 mg/kg); SS-2 (2,390 mg/kg); SS-3 (993 mg/kg); SS-4 (794 mg/kg) and the duplicate (1,580 mg/kg); SS-5 (19,700 mg/kg); SS-6 (9,780 mg/kg); SB-4 at 0 to 2 feet $(3,750 \text{ mg/kg})$ and the duplicate $(3,390 \text{ mg/kg})$; SB-5 at 2 to 5 feet (580 mg/kg) ; SB-6 at 0 to 2 feet (2,940 mg/kg); SB-10 at 1 to 5 feet (211 mg/kg); SB-11 at 1 to 3 feet (311 mg/kg); and SB-12 at 1 to 3 feet (379 mg/kg).

Cyanide was detected in soil samples at concentrations ranging from 1.8 to 2.4 mg/kg. Cyanide exceeds the GSI criterion of 0.1 mg/kg at soil borings SS-1 (2.0 mg/kg) and SB-4 at 0 to 2 feet (2.40 mg/kg) and the duplicate (1.80 mg/kg).

The highest concentrations and greatest number of inorganic compounds detected in soils were in samples collected directly north of the PMC building. Unlike the organic compounds, there is not an overall pattern to the vertical distribution of inorganic compounds. The source(s) of the inorganic compounds present at the site are not known.

The Phase II soil sampling inorganic analytical data and criteria comparisons are presented in Table 5-5. The Phase I soil sampling inorganic analytical data and criteria comparisons are

 $\frac{1}{2}$

presented in Tables 5-9 and 5-12. The inorganic compounds whose concentrations exceeded the Residential, Industrial and GSI Criteria are presented on Figures 5-1, 5-2, and 5-3, respectively.

5.2 EVALUATION OF GROUNDWATER ANALYTICAL DATA

5.2.1 Evaluation Criteria

The groundwater analytical data obtained from the Phase II Remedial Investigation were compared to several sets of applicable cleanup criteria established by the State of Michigan under Part 201, Environmental Remediation, of Act 451, Natural Resources and Environmental Protection Act (PA 1995, as amended). The criteria sets used for this comparison were:

- Generic Residential Cleanup Criteria (GRCC)
- Groundwater/Surface Water Interface (GSI) Criteria
- Generic Industrial Cleanup Criteria
- Groundwater Contact Criteria (GCC)

The applicable cleanup criteria for the compounds detected in the groundwater samples are presented in the analytical data tables.

5.2.1.1 Determination of Generic Residential Cleanup Criteria

The GRCC were determined by using either the Health-Based or Aesthetic Cleanup Criteria (MERA Operational Memorandum 8, Revision 4, June 5, 1995), and Site-Specific Background Concentrations.

The determination of which Residential Cleanup Criteria should be used to evaluate the concentrations of the compounds detected in the samples began by using the most restrictive of the Residential Health-Based and Aesthetic criteria. MERA Operational Memorandum 8, Revision 4, June 5, 1995 allows the use of Background Concentrations (Site-Specific) for selected inorganic compounds if they are higher than the criteria established using the method discussed above. Site specific background concentrations could not be determined for groundwater at the site because there

 $\frac{1}{4}$

 $\bar{\Delta}$

 \mathcal{L}_{max}

 γ : \overline{a}

was only one sampling event in the Phase II RI, therefore could not develop statistically valid background values. In cases where GRCC are lower than target method detection limits (MDLs), the target MDLs became the Residential Cleanup Criteria.

5.2.1.2 Determination of GSI Criteria

The GSI criteria are protective of surface water. They were developed to address groundwater discharging to a surface water body which may or may not be used as a drinking water source. The GSI criteria presented for comparison at this site apply to surface waters not protected as a drinking water source, because Lake Michigan is not a drinking water source for the City of Petoskey. Demonstration of compliance with surface water cleanup requirements may be made by assessing groundwater concentrations at the Groundwater-Surface Water Interface or through evaluation of the concentrations at the mixing zone. Predictive modeling and direct monitoring are options available to establish compliance with the GSI Cleanup Criteria at the groundwater-surface water interface. It is not necessary to meet the GSI Criteria throughout the aquifer if the groundwater-surface water interface zone serves as the compliance point. However, a remedial action plan which proposes meeting the GSI values throughout the aquifer in lieu of modeling or monitoring at the interface, is also acceptable.

The GSI Criteria are presented in an Addendum to MERA Operational Memorandum 8, Revision 4, and Operational Memorandum 14, Revision 2, dated November 3, 1997. The GSI values were recently updated as part of new administrative rules for Part 31 of Act 451, as amended. However, as of December 10, 1997, the list of GSI values has not been finalized. Therefore the GSI values in MERA Operational Memorandum 8, Revision 4 dated June 5, 1995 were used to evaluate compounds for which GSI criteria are not yet available.

5.2.1.3 Determination of Generic Industrial Cleanup Criteria

The Industrial Cleanup Criteria were determined by using either the Industrial Health-Based or Aesthetic Groundwater Criteria (MERA Operational Memorandum 14, Revision 2, June 6, 1995),

the SWP-Industrial Cleanup Criteria (currently being developed), and the Site-Specific Background Concentrations.

Deciding which criteria to use to evaluate a compound began by using the most restrictive of the Industrial Health-Based and Aesthetic criteria. The more restrictive of the Industrial Health-Based and Aesthetic Criteria were then compared to the SWP-Industrial Cleanup criteria. The SWP-Industrial Cleanup criteria have not been published yet, but were provided to Malcolm Pirnie on December 8, 1997 by the MDEQ for the purpose of this comparison. In instances where the SWP-Industrial Cleanup criteria were higher than the Industrial Health-Based or Aesthetic criteria, the SWP-Industrial criteria were selected. MERA Operational Memorandum 14, Revision 2, June 6, 1995 permits the use of Background Concentrations (Site-Specific) for selected inorganic compounds if their concentrations are higher than the criteria established using the method discussed above. However, site-specific statistically valid background concentrations could not be developed due to the lack of adequate number of sampling events during the Phase IIRI.

5.2.1.4 Determination of Groundwater Contact Criteria

Groundwater Contact Criteria (GCC) may be used to address dermal contact with groundwater contaminants. These criteria have been developed by the State to address contamination at facilities where the groundwater is not classified as an aquifer, or where groundwater is reliably restricted from drinking water use. The GCC were used where it could be demonstrated that:

- Groundwater contaminants are not migrating to an aquifer at concentrations above Residential Drinking Water values, or drinking water use of the aquifer is reliably restricted, and
- Contaminants are not migrating to nearby surface water body at concentrations above applicable Generic or mixing zone-based GSI criteria, and
- Underground utilities exist in water saturated soils, or underground utilities may be constructed within the saturated soils at a facility.

 \hat{x}

The GCC address only the dermal route of exposure to groundwater contaminants. Exposure through other pertinent pathways (i.e, indoor or ambient air inhalation, irrigation uses, or swimming uses) may result in the application of more restrictive criteria than the GCC.

Assessment of emissions of groundwater contaminants to indoor air and confined spaces (such as utility trenches) is required for chemicals with a Henry's Law constant greater than 1 x 10⁻⁵ atm $m³/mole$ and a molecule weight of less than 200 g/mole. The Indoor Air cleanup criteria are currently being drafted and reviewed by MDEQ. The MDEQ guidance requires that until the MDEQ establishes Generic Groundwater Inhalation Criteria for volatile emissions to Indoor Air and confined spaces, the ASTM Risk-Based screening levels for "groundwater volatile emission to indoor air" may be used to evaluate groundwater contaminant concentrations.

5.2.2 Evaluation of Groundwater Analytical Data

Groundwater samples were collected in 1992, and as part of the Phase IIRI in October, 1995. For the purpose of the following evaluation, only the most current Phase II RI groundwater analytical data were evaluated because they are representative of current site conditions. The analytical data of samples collected from 31 monitoring wells and the Ingalls well are presented in Tables 5-13 through 5-18.

5.2.2.1 Volatile Organic Compounds

The following volatile organic compounds were detected at concentrations below the Generic Residential, Industrial, GSI, and Groundwater Contact Criteria in groundwater samples collected at the site; their concentration ranges are shown in parentheses: 1,2-Dichloroethene (total) (0.9 to 4 μ g/l); acetone (4 to 15 μ g/l); one detection of 2 butanone (13 μ g/l); one detection of carbon disulfide (1 μ g/l); one detection of cis 1,2-Dichloroethene (3 μ g/l); one detection of chloroform (1 μ g/l); methylene chloride (0.6-5 μ g/1); and one detection of tetrachloroethene (0.8 μ g/1).

÷

ņ ل جد.

 $\ddot{}$ $\begin{array}{c} 1 \\ 2 \\ 1 \end{array}$

 $\frac{1}{\sqrt{2}}$ $\bar{\alpha}$

 $\hat{\mathcal{A}}$

 $\hat{\beta}$ \mathbf{L} $\frac{1}{2}$

Vinyl Chloride was detected in samples at concentrations ranging from 1 to 16 μ g/l. Vinyl chloride exceeded the Residential and Industrial Cleanup Criterion of 2 μ g/l, and the GSI criterion of 15 μ g/l only at well MW-201S (16 μ g/l).

Trichloroethene (TCE) was detected in samples at concentrations ranging from 1 to 82 ug/1. TCE exceeded the Residential and Industrial Cleanup Criterion of 5 μ g/l at wells PS-CD (46 μ g/l); duplicate PS-CD (49 ug/I); PS-4 (15 ug/l); PS-11 (19 ug/1); MW-201S (13 ug/1); MW-203S (82 ug/1); and MW-204S (35 ug/1).

The TCE is present in a northwesterly trending plume from the PMC building to the vicinity of the Ingalls well. The TCE is generally present in the shallow portion of the aquifer near the PMC building, but it is encountered deeper in the aquifer northwest of the building. No TCE was detected in wells MW-205I or MW-205D (screened from 38 to 43 feet bgl and 54 to 59 feet bgl, respectively). Since wells MW-205I and MW-205D are screened at similar and deeper intervals than well PS-CD, and no TCE is detected there, it appears that the TCE plume is present north of wells MW-205I and MW-205D. The bottom of the Ingalls municipal well is at 16 feet bgl. This depth is considerably shallower than the TCE plume detected at well PS-CD. The presence of only 2 μ g/l of TCE in the Ingalls municipal well indicates that the plume may also be present beneath and/or east of the Ingalls well. The distribution and migration of TCE in the aquifer appears controlled by the presence of fractures in the bedrock, as well as by the pumping of the Ingalls well and the fluctuating water level in Lake Michigan. A schematic cross-section of the site which shows the horizontal and vertical distribution of TCE and other organic compounds whose concentrations exceed applicable cleanup criteria, is presented on Figure 5-5.

The Phase II groundwater VOC analytical data and their comparisons with cleanup criteria are presented in Table 5-13. The tentatively identified compounds (TICs) are presented in Table 5- 17. The distribution of the VOCs at concentrations which exceed the Residential, Industrial, and GSI, criteria is presented in Figure 5-4.

PH2RI.028 02/18/98 02/18/98 $2420-017$ -H41 5-16

5.2.2.2 Semi-Volatile Organic Compounds

The following semi-volatile organic compounds were detected at concentrations below the Generic Residential, Industrial, GSI and Groundwater Contact Cleanup Criteria in groundwater samples collected at the site; their concentration ranges are identified in parentheses: one detection of acenaphthylene (0.1 μ g/l); one detection of diethyl phthalate (0.4 μ g/l). In addition, total petroleum hydrocarbons (TPH) and diesel range organics (DRO) were present in the groundwater in concentrations up to 23 mg/1 and 58 mg/1, respectively.

Bis (2-ethylexyl) phthalate was detected in concentrations ranging from 8 to 38 μ g/l. Bis (2-ethylexyl) phthalate exceeded the Residential and Industrial Cleanup criterion of 6 μ g/l at PS-DD (38 μ g/l); duplicate PS-DD (19 μ g/l); PS-4 (19 μ g/l); PS-6 (16 μ g/l); PS-106 (9 μ g/l); PS-1R (29 μ g/l); and Ingalls Well (8 μ g/l). It should be noted that this compound is a common laboratory contaminant. It was detected at various locations away from the PMC building including the upgradient monitoring well PS-1R and, it was also present in some of the method blanks. Therefore it may be attributable to other sources in addition to discharges at the PMC site.

TPH and DRO were detected in low concentrations in the groundwater samples from monitoring wells PS-4, PS-104 and MW-201S. The TPH concentrations were highest at well MW-20IS (23 mg/1), while DRO was highest at well PS-104 (58 mg/I). It should be noted that overlying soils at well location MW-201 contained 100 mg/kg each of DRO and TPH. While no soil or groundwater State cleanup criteria are available for these two suites of components, their concentrations are not indicative of substantial contamination or the presence of any non-aqueous phase liquids (NAPLs) at this location.

The Phase II groundwater SVOC analytical data and their comparisons to the cleanup criteria are presented in Table 5-14. The tentatively identified compounds (TICs) are presented in Table 5- 18. The only SVOC compound whose concentrations exceed the Residential and Industrial cleanup criteria are shown on Figures 5-4 and 5-5.

 $\frac{1}{2}$.

5.2.2.3 Pesticides and PCBs

The following pesticides were detected at concentrations below the applicable Generic Residential, Industrial, GSI, and Groundwater Contact Criteria in groundwater samples collected at the site; their concentration ranges are identified in parentheses: one detection each of endrin aldehyde (0.068 µg/l) and heptachlor (0.066 µg/l) . No PCBs were detected in the groundwater samples collected at the site.

4.4'-DDT was detected in samples at concentrations ranging from 0.011 to 0.023 µg . 4.4'-DDT exceeded the GSI criterion of 1.1 E-5 μ g/l at wells COP-1 (0.011 μ g/l); COP-3 (0.011 μ g/l); and COP-4 (0.023 μ g/l). A concentration of 0.011 μ g/l was also present in the pump blank sample PB-7 which was obtained after sampling well COP-1 and two other wells which did not contain any 4,4'-DDT.

The locations where pesticides were detected in the groundwater are located several hundred feet northwest of the PMC building in an area where unrelated (Pre-1982) storage activities have been reported. No pesticides were detected in any of the monitoring wells located near the PMC building or between the PMC building and the COP wells, indicating that PMC is not a likely source of the pesticides in the groundwater.

The Phase II groundwater pesticide analytical data and their comparisons with relevant criteria are presented in Table 5-15. The pesticide whose concentration exceeded a cleanup criterion are shown on Figure 5-4.

5.2.2.4 Inorganic Compounds

The following eleven inorganic compounds were detected at concentrations below Residential, Industrial, GSI and Groundwater Contact Cleanup Criteria in the groundwater samples collected at the site; their concentration ranges are identified in parentheses: aluminum (8.0 to 50.4 ug/l); arsenic (2.0 to 4.5 µg/l); barium (1.1 to 75.1 µg/l); cobalt (1.0 to 19 µg/l); copper (1.1 to 6.1 μ g/l); magnesium (26.2 to 30,200 μ g/l); nickel (1.2 to 42.3 μ g/l); selenium (2.2 to 3.3 μ g/l); sodium (96.5 to 79,400 μ g/l); vanadium (1.1 to 1.2 μ g/l); and zinc (5.1 to 215 μ g/l).

PH2RI.028 02/18/98 02/18 2420-017-H41 5-18

Aluminum exceeded the Residential and Industrial Cleanup Criterion of 50 ug/1 only in the pump blank sample PB-2 (50.4 ug/1).

Antimony was detected in samples at concentrations ranging from 2.8 to 6.7 ug/l with exceedence of the Residential and Industrial Cleanup criterion of 6 $\mu\alpha$ at well COP-5 (6.3 $\mu\alpha$).

Cadmium was detected in samples at concentrations ranging from 1.1 to 3.8 μ g/l with one exceedence of the GSI criterion of 3.6 μ g/l at well PS-105S (3.8 μ g/l).

Chromium was detected in samples at concentrations ranging from 1.5 to 39.9 μ g/l with one exceedence of the GSI criterion of 11 μ g/l at well COP-2 (39.9 μ g/l).

Iron was detected in several samples at concentrations ranging from 14.8 to 2,580 μ g/l. Iron concentrations exceeded the Residential and Industrial Cleanup criterion of 300 µg/l at wells PS-AD (1,250 μg/l); PS-105S (317 μg/l); COP-3 (384 μg/l); COP-4 (1,480 μg/l); MW-201S (2,580 μ g/l); and MW-203D (1,270 μ g/l).

Lead was detected in samples at concentrations ranging from 2.1 to $44.4 \mu g/l$. Lead concentrations exceeded the Residential and Industrial Cleanup criterion of 4 μ g/l and the GSI criterion of 19 μ g/l at well PS-105S (44.4 μ g/l).

Manganese was present in samples at concentrations ranging from 1.1 to 194 ug/1. Manganese concentrations exceeded the Residential and Industrial Cleanup criterion of 50 µg/l at wells COP-3 (51.5 ug/1); COP-4 (194 ug/1); and MW-201S (91.2 ug/1).

Silver was detected in one sample (PS-CD) at a concentration of 2.1 µg/l, which exceeds the GSI criterion of 0.057 µg/l.

Thallium was present in most samples at concentrations ranging from 3.6 to 5.5 ug/l. The concentrations of Thallium exceeded the Residential and Industrial Cleanup criterion of 2 µg/l, and the GSI criterion of 3.7 μ g/l at wells PS-11 (3.9 μ g/l); PS-105D (4.1 μ g/l); COP-2 (4.1 μ g/l); COP-5 (4.4 ug/1); MW-201S (4.7 ug/1); MW-202S (3.7 ug/I); MW-203D (4.0 ug/1); MW-204S (4.6 ug/1); MW-205I (5.5 μ g/l); MW-205D (5.3 μ g/l); and Ingalls Well (4.3 μ g/l). Thallium concentrations in the samples from wells COP-1 (3.7 μ g/l) and COP-3 (3.6 μ g/l) only exceeded the Residential and

PH2RI.028 02/18/98 02/18 2420-017-H41 5-19

 $\ddot{}$

 \ddotsc

 \mathcal{J}

 $\frac{1}{2}$

 $\frac{1}{\sqrt{2}}$ $\ddot{}$

Industrial Cleanup criterion. It should be noted that Thallium was present in the method blanks and in pump blank samples PB-1(4.0 μ g/l), PB-2 (4.6 μ g/l) and PB-5 (4.0 μ g/l).

The pattern of distribution of the inorganic compounds at the site and the relative absence of inorganic compounds (with the exception of iron, manganese and Thallium) in the ground water south of Water Street, in the vicinity of the PMC building, suggests that PMC is not the major source of the inorganic compounds in the groundwater.

The distribution of iron is inconclusive and may/be attributable to site activities an/or to natural conditions (i.e., inclusions in the fractured limestone/shale bedrock). Manganese is present next to the PMC building at concentrations exceeding the cleanup criterion, but it is also present at even higher concentrations in downgradient well COP-4, separated by several wells which do not contain excessive manganese concentrations. Therefore, the manganese in the groundwater cannot be conclusively attributed to the PMC building.

The widespread distribution, similarity of concentrations, and presence of Thallium in the laboratory method blanks and pump blanks suggest that it is an analytical artifact.

The inorganic compounds present in the groundwater samples and their comparisons with the applicable cleanup criteria are presented in Table 5-16. The inorganic compounds whose concentrations exceeded any of the cleanup criteria are shown on Figures 5-4 and 5-5.

 $\ddot{\cdot}$ \sim

 $\frac{1}{2}$ $\frac{1}{2}$

 $\mathbb{R}^{\frac{1}{2}}$ $\frac{1}{\gamma}$

in. \overline{a}

 $\frac{1}{2}$ $\bar{\omega}$ \cdots عزني

6.0 RISK ASSESSMENT

This section presents an assessment of potential human health risks associated with chemical contaminants detected at the PMC site. The objectives of this assessment are to provide an analysis of baseline risks, currently and in the future, in the absence of any actions to control or mitigate site contamination and to assist in determining the need for and extent of remediation.

The risk assessment follows guidance contained in the U.S. Environmental Protection Agency's (USEPA) Risk Assessment Guidance for Superfund. Volume I. Human Health Evaluation Manual (Part A) (USEPA, 1991; 1989b). Additional USEPA and MDEQ guidance is cited throughout the assessment.

The potentially exposed populations and exposure pathways evaluated in the risk assessment were selected by the MDEQ (1996), assuming the site is developed for residential use in the future. MDEQ is reporting that the City of Petoskey intends to re-zone the site as multi-family residential, with PMC being a "non-conforming" use. The potentially exposed populations and exposure pathways include:

- Current adolescent resident (termed adolescent trespasser) exposed to contaminated on-site soils (i.e., trespassing).
- Current adult resident and PMC worker (termed PMC worker) exposed to contaminated on-site soils ("limited industrial").
- Future adult "generic residential" use (exposed to contaminated on-site soils and to contaminated groundwater).
- Future child (under 7) "generic residential" use (exposed to contaminated on-site soils and to contaminated groundwater).
- Future limited residential use. This would include a house with a basement on the PMC site. Residents would receive water from the forthcoming new municipal water supply and would not be exposed to the contaminated groundwater plume. Residents would be able to have a garden and plant trees.

PH2R1.028 02/18/98 02/18/98 $2420-017$ -H41 $6-1$

 \mathbb{R}

 $\frac{3}{4}$

- Future limited residential use. This would include a house with a foundation on the PMC site. Residents would receive water from the forthcoming new municipal water supply and would not be exposed to the contaminated groundwater plume. Residents would be able to have a garden and plant trees.
- Future earth mover/contractor (termed construction worker) exposed to on-site soils.

There are typically four components to the risk assessment process: data evaluation, exposure assessment, toxicity assessment, and risk characterization. During data evaluation, relevant site data are compiled and analyzed to ensure the data are of acceptable quality for use and to identify chemicals (termed chemicals of potential concern) that are likely to be representative of site contamination. In the exposure assessment, actual or potential chemical release pathways are analyzed, potentially exposed populations and exposure pathways are identified, chemical concentrations at potential points of human exposure are derived, and chemical intakes are estimated. In the toxicity assessment, qualitative and quantitative toxicity data for each of the chemicals of potential concern are summarized, and appropriate guidance levels with which to characterize risks are identified. The likelihood and magnitude of adverse health risks are estimated in the risk characterization, in the form of noncancer hazard quotients and cancer risks. Sources of uncertainty in the evaluation are then noted and discussed. This integrated approach is used to evaluate and discuss potential human health risks.

6.1 DATA EVALUATION

Soil and groundwater samples were collected at the PMC site as part of Phase I and Phase II Remedial Investigations (RI) conducted by Eder Associates in 1992 and Malcolm Pirnie, Inc. in 1995, respectively. The analytical results for six surface soil (0-6 inches) samples and soil samples at various depths from 15 soil borings from the Phase I RI are used in the risk assessment. The analytical results for soil samples at various depths from six soil borings installed to supplement the

 \mathbf{A}

 \sim

 $\frac{1}{2}$ \mathbb{R}^2

 $\frac{1}{2}$

Phase IRI data and groundwater samples collected from 32 monitoring wells (i.e., the latest sampling round) from the Phase II RI are used in the risk assessment. The results of these efforts are briefly summarized and analyzed again here with the intent of identifying those environmental media and chemicals of potential concern that, if contacted, pose potential risks to human health.

In establishing the soil and groundwater data sets, samples and their duplicates were not considered as separate sampling events. Rather, the higher of the detected values from the two was selected for each chemical. Data that were assigned qualifiers indicating that the numerical value is an estimated quantity, or that the identity and quantity are based on presumptive evidence, were treated the same way as data without such qualifiers. Data from environmental samples were then compared with data from sample blanks. Consistent with USEPA guidance (USEPA, 1989b), results for common laboratory contaminants (e.g., acetone, 2-butanone, methylene chloride, toluene and the phthalate esters) were considered positive only if the concentrations in the site sample were found to exceed ten times the maximum amount detected in any blank. For other chemicals that are not considered common laboratory contaminants, results were considered positive only if the concentration of the chemical in the site sample exceeded five times the maximum amount detected in any blank.

6.1.1 Chemicals of Potential Concern

The analytical data are summarized by environmental medium in Tables 6-1 to 6-5 and are briefly discussed in the following subsections.

The selection of chemicals of potential concern is based on:

- Frequency of detection. With samples sizes greater than 20, selection is based on detection in 5% or more of the samples in a medium. Chemicals detected infrequency (i.e., in less than 5% of the samples) and at low concentrations (i.e., in concentrations below the appropriate MDEQ generic residential cleanup criteria presented in Section 5.0) are not selected as chemicals of potential concern. With sample sizes less than 20, selection is based on detection in at least one sample in a medium.
- For the inorganic chemicals, comparison to background. For soils, selection is based on an arithmetic average concentration greater than two times the arithmetic average concentration

PH2RI.028 02/18/98 02/18/98 2420-017-H41 6-3

in the background samples. For groundwater, selection is based on detection at a concentration greater than that in the one background sample. (While a number of organic chemicals were detected in the background samples for both soil and groundwater, selection of organic chemicals is not based on comparison to background.)

For the essential nutrients (i.e., calcium, iron, magnesium, potassium and sodium) comparison to reference concentrations derived from recommended daily allowances. Selection is based on concentrations greater than the appropriate reference concentrations. The derivation of reference concentrations is presented in Appendix F.

The chemicals of potential concern, by environmental medium, are summarized in Table 6-6.

6.1.2 Soil Data

 $\frac{1}{4}$ $\bar{\beta}$

 $\frac{1}{2}$

The soil data are organized into "shallow soil", "subsurface soil", and "all soil" as described in the following presentations:

Shallow Soil: "Shallow soil" is broadly defined as soil less than 2 feet deep. The samples that comprise the shallow soil data set are predominantly from 0-6 inches and 0-2 feet; a few samples from 1-3 feet, 1-5 feet, and 1-6 feet are included in the data set since the contamination could be at a depth less than 2 feet. These data are used to evaluate potential exposure by adolescent trespassers and PMC workers under current conditions and residents (i.e., "limited residential use") under future conditions. Use of the shallow soil data for residential exposure is based on an assumption that the shallow soil is not mixed with the deeper soil during development of the site.

The analytical data for shallow soil are summarized in Table 6-1; the frequency of detection and detected concentration range in site samples and background samples are provided for comparison. The typical elemental composition of Michigan soils is also provided for comparison.

Eight volatile organic compounds (VOCs), 19 semi-volatile organic compounds (SVOCs), six pesticides, PCBs, 23 inorganic chemicals, and cyanide were detected in the site samples. Three VOCs, nine SVOCs, one pesticide, and 18 inorganic chemicals were detected in background samples.

All of the organic chemicals are selected as chemicals of potential concern. Twelve inorganic chemicals are selected as chemicals of potential concern based on the comparison to background

PH2RI.028 02/18/98 02/18 2420-017-H41 6-4

 \mathcal{N}

presented in Table 6-2. Although detected in elevated concentrations relative to background, magnesium is not selected since it was detected at an average concentration less than the reference concentration established for this essential nutrient. The reference concentrations for essential nutrients are presented in Appendix F. Cyanide is also selected as a chemical of potential concern.

Subsurface Soil: "Subsurface soil" is broadly defined as between 2 and 15 feet; two samples from approximately 14-16 feet are included in the data set in order to not exclude otherwise useable data. These data are used to evaluate potential inhalation exposure under future conditions by residents (i.e., "limited residential use") to chemicals released from the subsurface and transported to indoor air.

The analytical data for subsurface soil are summarized in Table 6-3; the frequency of detection and detected concentration range in site samples and background samples are provided. The typical elemental composition of Michigan soils is also provided for comparison.

Eight VOCs, 18 SVOCs, three pesticides, and 21 inorganic chemicals were detected in the subsurface soil samples. Five VOCs and 20 inorganic chemicals were detected in background subsurface soil samples.

All of the VOCs are selected as chemicals of potential concern. No other chemicals are selected as chemicals of potential concern based on the intended use of the data.

All Soils: "All soils" includes shallow and subsurface soil data. These data are used to evaluate potential exposure under future conditions by residents ("generic residential use") and construction workers. Use of all soil data for residential exposure is based on an assumption that the deeper soil is mixed with the shallow soil during development of the site.

The analytical data for all soils are summarized in Table 6-4; the frequency of detection and detected concentration range in site samples and background samples are provided. The typical elemental composition of Michigan soils is also provided for comparison.

With the exception of three SVOCs, three pesticides and PCBs, all other organic chemicals are selected as chemicals of potential concern. The organic chemicals not selected are eliminated based on infrequent detection and low concentration relative to the MDEQ generic residential cleanup

MALCOLN

criteria (direct contact values). Eleven inorganic chemicals are selected as chemicals of potential concern based on the comparison to background presented in Table 6-2. Cyanide is also selected as a chemical of potential concern.

6.1.3 Groundwater Data

The analytical data for groundwater from both shallow and deep monitoring wells are summarized in Table 6-5; the frequency of detection and detected concentration range in site samples and background samples are provided. These data are used under future conditions to evaluate potential exposure from potable use by residents ("i.e., generic residential use") and inhalation exposure by residents (i.e., "limited residential use") to chemicals released from the groundwater and transported to indoor air.

Five VOCs, two SVOCs, two pesticides and 17 inorganic chemicals were detected in the groundwater samples. Two VOCs and 10 inorganic chemicals were detected in background groundwater samples.

Three VOCs are selected as chemicals of potential concern. The other organic chemicals are not selected based on infrequent detection and low concentration relative to the MDEQ generic residential cleanup criteria (health-based drinking water values). Since inorganic chemicals were only analyzed in one background or upgradient sample, the maximum concentration detected in each site sample was compared to the concentration in the background sample. With the exception of the essential nutrients (calcium, iron, magnesium, potassium and sodium), all of the inorganic chemicals are selected as chemicals of potential concern. Although detected in elevated concentrations relative to background, calcium, iron, magnesium, potassium and sodium are not selected since they were detected in concentrations less than the reference concentrations derived for these essential nutrients. The reference concentrations for essential nutrients are presented in Appendix F.

PH2RI.028 02/18/98 02/18 $2420-017-H41$ 6-6

 \mathbb{R}^{n}

 $\begin{array}{c}\n\frac{1}{2} \\
\frac{1}{2} \\
\frac{1$

 $\begin{array}{c}\n\ddots \\
\vdots \\
\vdots \\
\end{array}$

 $\ddot{}$

÷, \ddotsc

6.2 EXPOSURE ASSESSMENT

The objective of the exposure assessment is to estimate the type and magnitude of human exposure to the chemicals of potential concern that are present at or capable of migrating from the site. Assessments are made for potentially exposed populations at or near the site considering both current conditions and likely future conditions.

6.2.1 Potentially Exposed Populations and Exposure Pathways

Currently, potentially exposed populations include adult PMC workers and adolescent trespassers. Both populations are assumed to reside in the vicinity of the PMC site. Adults have been selected to represent the PMC worker population while adolescents, ages 12 to 15, have been selected to represent the trespasser population. Evaluation of adolescent trespassers should adequately characterize potential exposure and health risks to adults that might trespass on the site.

Potentially exposed populations in the future may include adult and child residents and construction workers. Adults have been selected to represent the adult resident and construction worker populations. Children represent sensitive receptors as behavior patterns, body size, and exposure rates could lead to greater exposure to the chemicals of potential concern than would be experienced by adults; children, ages 0 to 6, have been selected to represent this population. Sensitive receptors can include any subpopulation that may be at increased risk from chemical exposures due to increased sensitivity, behavior patterns and/or current or past exposures from other sources.

Shallow soil represents the medium of concern regarding the current potential for human exposure as PMC workers and trespassers could contact chemicals of potential concern through inadvertent ingestion and dermal contact. As the municipal water supply provides potable water, there is little likelihood of human contact with groundwater under current conditions.

Shallow soil, subsurface soil, and groundwater represent media of concern regarding the future potential for human exposure. Future residents may contact chemicals of potential concern through inadvertent ingestion of and dermal contact with soil, inhalation of VOCs released from soil

PH2RI.028 02/18/98 02/18/98 $2420-017-H41$ 6-7

MAICOLM

 \sim

 \sim

 \sim \sim

and groundwater and transported to indoor air (i.e., enclosed spaces), and potable use of the groundwater. Future construction workers may contact chemicals of potential concern in soils through inadvertent ingestion and dermal contact and inhalation or respirable particulates released from the soil.

Direct contact exposure by residents is evaluated based on both shallow soil data ("limited residential use") and all soils data ("generic residential use"). Since, as subsequently discussed the exposure assumptions and parameters are the same for each residential use scenario, the estimated chemical intakes and risks for the two soil data sets can be applied to either or both scenarios. Construction worker exposure is based on all soils data.

It should be noted that as of December 1997, the City of Petoskey's primary drinking water supply is groundwater from the new Bay Harbor development. The Ingalls well will be used as a backup well until it is removed from service permanently as required by the Safe Drinking Water Act.

6.2.2 Exposure Point Concentrations

As discussed previously, a chemical-specific value representing the maximum concentration in a sample and its duplicate is used. This may result in an overestimation of exposure point concentrations. However, since relatively few duplicate samples were collected, the overall impact on the exposure and risk estimates should be minimal. If a chemical of potential concern was not detected in a sample, it is assumed to be present at $\frac{1}{2}$ its limit of detection, as a conservative "proxy" concentration. Adjusting non-detects by assigning values at $\frac{1}{2}$ the limit of detection assumes that a chemical may be present at a concentration just below the reported detection limit, and may result in overestimation of the exposure point concentrations. Use of qualified data may result in overestimation or underestimation of the exposure point concentrations.

Exposure point concentrations and parameters and assumptions used to assess exposure are developed to portray reasonable maximum exposures (RME) which might be expected to occur under current and future conditions (USEPA, 1989b). That is to say, the highest exposure that might

reasonably be expected to occur at the site, one that is well above the average case of exposure but within the range of possibility, is considered.

In order to determine the chemical concentrations to which an individual might be exposed over many years, it is necessary to evaluate the entire analytical data set in order to develop representative exposure point concentrations. The USEPA (1992b, I989b) recommends that the arithmetic average concentration of the data should be used for evaluating long-term exposure and that, because of the uncertainty associated with estimating the true average concentration at a site, the 95% upper confidence limit (UCL) on the arithmetic average should be used as the exposure point concentration. The 95% UCL provides reasonable confidence that the true average will not be underestimated. Since the USEPA also indicates that, in most cases, it is reasonable to assume that Superfund sampling data are lognormally distributed, the following equation (Gilbert, 1987) was used to derive 95% UCL concentrations for chemicals of potential concern in soil and groundwater:

$$
UCL = e^{(x + 0.5s * s + sH/\sqrt{(n-1)})}
$$

where:

 $\frac{1}{2}$

 $\frac{1}{2}$

If there is great variability in measured concentrations, the 95% UCL concentration may be high and occasionally exceed the maximum detected concentration. In such cases the maximum con-

 \mathbf{y}_{max}

centration is used as the exposure point concentration. Using the maximum concentration may result in an overestimation of the exposure point concentration.

Exposure point concentrations of chemicals of potential concern in air were calculated as described in Appendix F. Concentrations of VOCs of potential concern in indoor air from release from groundwater during showering were calculated. Concentrations of VOCs of potential concern in indoor air from release from groundwater and subsurface soil underlying residential construction were also calculated. Two scenarios were considered: residences constructed on foundations (slabon-grade) and residences constructed with basements. Exposure point concentrations of non-VOC chemicals of potential concern adsorbed to respirable particulates released to air above an excavation were also calculated. A scenario involving the digging of an excavation by a bulldozer in an area of contaminated soils was considered. Only emissions from the digging of the excavation were estimated; the soil removed from the excavation was assumed to be placed on the side of the excavation and covered to prevent further respirable paniculate release.

While the derivation of representative exposure point concentrations assumes no transformation or loss due to environmental degradation, the environmental fate and transport of chemicals detected on-site are important in determining the ultimate hazard to populations on or in the vicinity of the site. After a chemical is released to the environment, it may be transformed physically (e.g., by volatilization, precipitation, etc.), chemically (e.g., by photolysis, hydrolysis, oxidation, reduction, etc.), or biologically (e.g., by biodegradation); alternatively, it may be accumulated in one or more media (including biomass) or may be transported (e.g., convected downstream in water or on suspended sediment or through the atmosphere).

6.2.3 Estimates of Chemical Intake

In addition to the derivation of representative exposure point concentrations, evaluation of potential human exposure involves the estimation of several parameters such as ingestion and inhalation rates; skin surface areas available for contact; skin permeability factors; and exposure time, frequency, and duration. The generic equation for estimating chemical intakes, that defines the intake

PH2RI.028 02/18/98 2420-017-H41 6-10

بأعمال

 \sim

 \sim

a a

 $\ddot{}$

variables in terms of chemical-related, population-related and evaluation-determined parameters, is presented in Table 6-7. The averaging time (AT) referenced in the equation depends on the type of toxic effect being assessed. When evaluating exposures for potential long-term, non-cancer health effects, intakes are calculated by averaging over the period of exposure. This is equal to the exposure duration (ED) multiplied by 365 days/year. When evaluating potential carcinogenic risks, intakes are calculated by prorating the total cumulative intake over a lifetime (i.e., lifetime average daily intake). For calculation purposes, this is equal to 70 years multiplied by 365 days/year. This distinction is consistent with the hypothesis that the mechanism of action for each of these effects is different. The approach for carcinogens is based on the assumption that a high dose received over a short period of time is equivalent to a corresponding low dose spread over a lifetime.

Other variables used in estimating chemical intakes, as presented in Table 6-8, are described below. Application of the exposure equations results in intake or, for dermal contact exposure, absorbed dose, expressed in milligrams of chemical per kilogram of body weight per day (mg/kg-day).

Soil: Table 6-8 presents the parameters and assumptions used in assessing potential ingestion and dermal contact exposure to the chemicals of potential concern in soils by adolescent trespassers, PMC workers, resident adults and children and construction workers. In evaluating inadvertent ingestion of soil (as might result from hand-to-mouth behavior), the following average soil ingestion rates (IR) are used: 100 mg/day for adolescent trespassers and adult residents, 50 mg/day for PMC workers, 200 mg/day for child residents, and 480 mg/day for construction workers (USEPA, 1991).

The "fraction ingested" (FI) is based on an estimate of the fraction of soil that is presumed to be contaminated. It is assumed that 100% of the soil contacted is contaminated with concentrations equivalent to the appropriate exposure point concentrations.

The exposure frequency (EF) for adolescent trespassers is assumed to be 50 days/year; this represents exposure either twice per week during the warmer months or weekly throughout the year. The exposure duration (ED) is assumed to be 3 years (the duration of years between the ages of 12 and 15). The EF for the PMC worker is assumed to be 112 days per year (3 $\frac{1}{2}$ days per week for 8 months, not including vacation and sick time) (MDNR, 1995b). Since it is assumed that the PMC

PH2RI.028 02/18/98 02/18/98 2420-017-H41 6-11

.
- ساخونده

 $\bar{\mathbb{Z}}^4$ \rightarrow

 \sim \sim

worker resides in the vicinity of the site an ED of 30 years (the 90th percentile time at one residence) is used. The EF for resident adults and children is assumed to be 350 days/year for ingestion exposure and 245 days/year for dermal exposure (MDEQ, 1995). The ED for resident adults is assumed to be 30 years; this is computed as 6 years at the child's rate of exposure and 24 years at the adult's rate of exposure (USEPA, 1991). The ED for the resident child is assumed to be 6 years. For the construction worker, the EF is assumed to be 80 days/year and the ED is assumed to be 2 years (MDNR, 1996); this can be interpreted in a number of ways (e.g., as four work months while foundations are being installed during two phases of site development).

The average body weight (BW) of an adolescent ages 12 to 15 is 48.7 Kg (USEPA, 1989a). The average BW of a child ages 0 to 6 is 15 Kg, while that of an adult is 70 Kg (USEPA, 1989a).

In order to evaluate dermal contact with soils, the surface area available for contact (SA), the soil-to-skin adherence factor (AF) and the rate of absorption (ABS) must be considered. A surface area of 3687 cm² (the average surface area of hands and arms of a 12-15 year old) is used for the adolescent trespasser. A surface area of 2570 cm² (the average surface area of forearms, face, and hands of an adult male) is used for the PMC worker. The surface areas used for a adult and child residents are 5000 and 1820 cm², respectively (MDNR, 1995). The surface area used for the construction worker is 4100 cm² (the average hands, forearms, and head of an adult male) (USEPA, 1989a). An AF of 1.00 mg/cm² (USEPA, 1992a) and ABSs of 10% for VOCs and 1% for other chemicals are used (MDNR, 1995a).

Groundwater: Table 6-8 presents the parameters and assumptions used in assessing potential ingestion, dermal contact and inhalation exposure to the chemicals of potential concern in groundwater by resident adults and children.

An ingestion rate (IR) of 2 liters/day is assumed for resident adults; this represents the 90th percentile value for adult daily water consumption (USEPA, 1989a). An IR of 1 liter/day, which represents the 90th percentile of daily water consumption for infants (USEPA, 1989a), is used for resident children.

ALCOL

For the evaluation of dermal contact with the chemicals of potential concern in groundwater, the greatest, but not the exclusive, opportunity for exposure is during showering. Thus, the entire surface area of the body is used to evaluate exposure via dermal contact. For adults, this value is 19,400 cm² which represents the 50th percentile total body surface area (SA) for an adult male (USEPA, 1989a). The 50th percentile total body surface area (SA) for a male child, age 1 to 6 is 6980 $cm²$ (USEPA, 1989a). Since the estimated exposure is designed to be the absorbed dose, chemical-specific dermal permeability coefficients (PC) are necessary to assess dermal exposure. The PC reflects movement across the skin to the underlying skin layers and into the bloodstream. The specific PCSs used in this assessment are provided in Table F-5 in Appendix F. An exposure time (ET) of 18 minutes/day (or 0.3 hours/day) is used to evaluate dermal contact with groundwater. This is a composite of showering activities and miscellaneous household tasks. Twelve minutes per day (or 0.2 hours/day) represents the 90th percentile value for showering for all age groups (USEPA, 1989a). It is assumed that 6 minutes/day (or 0.1 hours/day) is spent on miscellaneous tasks which allow for dermal contact with groundwater.

Inhalation rates (IR) of 0.83 and 0.6 m³/hour for resident adults and children, respectively, are used to evaluate inhalation of airborne (vapor phase) chemicals released from groundwater while showering (USEPA, 1989b). As with dermal exposure to groundwater, exposure time (ET) for the inhalation pathway is estimated as 18 minutes/day.

An EF of 350 days/year and EDs of 30 and 6 years for the adults and child, respectively, are used.

Air: Table 6-8 presents the parameters and assumptions used in assessing potential inhalation exposure to the VOCs of potential concern in indoor air by resident adults and children and to non-VOC chemicals of potential concern adsorbed to respirable particulates by construction workers. Inhalation rates (IR) of 0.83 and 0.6 $m³/hour$ are assumed for resident adults and children, respectively. The ET is based on an assumption that residents spend 17 hours/day in the home. An

.
- سائعه

IR of 2.3 m³/hour and an ET of 8 hours/day are assumed for the construction workers. All other parameters and assumptions for the residents and construction workers are as described previously.

6.3 TOXICITY ASSESSMENT

The toxicity assessment, also termed the dose-response assessment, serves to characterize the relationship between the magnitude of exposure and the potential that an adverse effect will occur. It involves determining whether exposure to a chemical can cause an increase in the incidence of a particular adverse health effect, and characterizing the nature and strength of the evidence of causation. The toxicity information is then quantitatively evaluated and the relationship between the dose of the contaminant received and the incidence of adverse effects in the exposed population is evaluated.

The USEPA and other regulatory agencies have performed toxicity assessments for numerous chemicals and the guidance they provide is used in this risk assessment. These include verified reference doses, or RfDs, for the evaluation of noncarcinogenic effects from chronic exposure and cancer potency slope factors for the evaluation of cancer risk from lifetime exposure. Each of these is discussed below. Sources of toxicological information and criteria, in order of preference, include IRIS (Integrated Risk Information System), which is a USEPA database containing current health risk and regulatory information for many chemicals (USEPA, 1997b), the USEPA Health Effects Assessment Summary Tables (HEAST) which are tabular presentations of provisional toxicity data (USEPA, 1997a), and the USEPA National Center for Environmental Assessment's (NCEA) Superfund Technical Support Center (formerly the Environmental Criteria and Assessment Office, ECAO) (USEPA, 1997c).

6.3.1 Noncarcinogenic Effects

The potential for noncancer health effects associated with chemical exposure is evaluated by comparing an estimated intake [such as a chronic daily intake (GDI)] over a specified time period with

六

 \mathcal{X}

a reference dose (RfD) derived for a similar exposure period. The RfD is an estimate of a daily exposure level for the human population, including sensitive subpopulations, that is likely to be without an appreciable risk of deleterious effects during a lifetime. According to the USEPA, RfDs often have an uncertainty spanning perhaps an order of magnitude or greater. Chronic RfDs, used in this report, are specifically developed to be protective of long-term exposure to a chemical. For the construction worker assumed to have exposure over a 2-year period, subchronic RfDs are the more appropriate criteria. However, as subchronic RfDs are often lacking or in some cases set equal to chronic RfDs, chronic RfDs are used as conservative approximations.

The RfDs for the characterization of chronic noncancer risk via both oral and inhalation exposure routes are presented in Table F-6 in Appendix F, along with the confidence level of the chronic RfD, the critical effect, the basis and source of the RfD, and any uncertainty or modifying factors used in the derivation of the RfD. All of the reference doses and concentrations have been developed by the USEPA.

RfDs for oral exposure are available for most of the chemicals of concern. RfDs are not available, however, for dermal exposure. In their absence, oral RfDs are used and adjusted as per USEPA guidance (USEPA, 1989b) to reflect absorbed dose. This allows for comparison between exposures estimated as absorbed doses and toxicity values expressed as absorbed doses. In the absence of chemical-specific information on oral absorption, a default efficiency was assumed. Oral absorption factors are presented in Table F-7 in Appendix F.

A limited number of reference concentrations (RfCs) for inhalation exposure are available. The available RfCs were converted into RfDs based on a standard inhalation rate of 20 m^3 /day, a standard body weight of 70 kg, and appropriate chemical-specific information.

The RfD for Aroclor 1254, the lower of the two available Aroclor-specific RfDs (the RfD for Aroclor 1260 is the other), is used as representative of all PCB mixtures. The RfD for trivalent chromium (Cr III) is used to evaluate exposure to chromium (analyzed and reported as total chromium) as there is no apparent source of hexavalent chromium (Cr VI) at the site and Cr III is the predominant species found in most environmental situations.

PH2RI.028 02/18/98 02/18/98 $2420-017$ -H41 6-15
لىن

 $\overline{\mathbb{R}}$

 \sim τ .

MALCOLN PIRN1E

The ratio of the estimate of chronic daily intake to the health-protective criterion (CDI/RfD) is called a hazard quotient (USEPA, 1989b). The hazard quotient assumes that there is a level of exposure (i.e., the RfD) below which it is unlikely for even sensitive subpopulations to experience adverse health effects. If the hazard quotient exceeds 1.0, there may be concern for potential noncancer effects. The greater the hazard quotient above 1.0, the greater the level of concern.

6.3.2 Carcinogenic Effects

Regardless of the mechanism of effect, risk evaluation methods employed by the USEPA generally derive from the hypothesis that thresholds for cancer induction by carcinogens do not exist and that the dose-response relationship is linear at low doses. Such risk evaluation methods require extrapolation from high dose animal studies to evaluate low dose exposure in humans. In the absence of adequate information to the contrary, a linearized, multistage, non-threshold low-dose extrapolation model is recommended by the USEPA as the most appropriate method for assessing chemical carcinogens. The USEPA emphasizes that this procedure leads to a plausible upper limit to the risk that is consistent with some proposed mechanisms of carcinogenesis.

Through application of this approach, the USEPA has derived estimates of incremental excess cancer risk from lifetime exposure to potential carcinogens. This is accomplished by establishing the carcinogenic potency of the chemical substance through critical evaluation of the various test data and fitting dose-response data to a low-dose extrapolation model. The slope factor (which describes the dose-response relationship at low doses) is expressed as a function of intake [i.e., per (mg/kgday)⁻¹]. The slope factors for the carcinogenic chemicals of concern presented in Table F-8 in Appendix F are used to estimate finite, upper limits of risk at low dose levels administered over a lifetime. For children, the estimated cancer risk reflects the potential risk over a lifetime due to childhood exposure. The weight-of-evidence classification for carcinogenicity, the type of cancer associated with each chemical of potential concern, and the basis and source of the slope factor are also presented in Appendix F.

The USEPA recommends a tiered approach for selecting the appropriate slope factor for evaluating exposure to PCBs (USEPA, 1997b). Based on the approach, since exposure via soil ingestion and dermal contact (with application of an absorption factor), the "high risk and persistence" upper-bound slope factor is used as representative of all PCB mixtures.

A relative potency approach recommended by the USEPA (1993) is used to estimate cancer risks from exposure to the carcinogenic PAHs. The relative potency approach, which takes into account the differing potencies of the carcinogenic PAHs, is used rather than the former practice of assuming that all carcinogenic PAHs are equivalent in potency to benzo[a]pyrene. Estimates of cancer risks under the equivalent potency assumption overestimates the carcinogenic potency of most PAH mixtures since benzo[a]pyrene has been demonstrated to be one of the most potent carcinogenic PAHs. The slope factor for benzo[a]pyrene is adjusted based on the following potencies of the other carcinogenic PAHs relative to benzo[a]pyrene:

The USEPA has classified lead as a B2 probable human carcinogen because some lead compounds cause kidney tumors in experimental animals. Despite these finding, the USEPA recommends that the quantitative estimates of the potency of lead not be used for risk evaluation purposes because of the considerable uncertainty in the estimates. As discussed above, exposure to chromium (analyzed and reported as total chromium) is evaluated as exposure to Cr HI; Cr III is not regarded as a carcinogen.

The following equation is used to arrive at an estimate of incremental cancer risk (USEPA, 1989b):

 $\hat{\phi}$

 $\frac{1}{2}$

$Risk = CDI \times SF$

where:

This linear equation is valid only at low risk levels (i.e., below estimated risks of 0.01). According to the USEPA, this approach does not necessarily give a realistic prediction of risk. The true value _ of the risk at trace ambient concentrations is unknown, and may be as low as zero.

As with RfDs, the USEPA has not derived slope factors for dermal exposure. In their absence, slope factors for oral exposure are used and adjusted to reflect absorbed dose. This allows for risk estimation based on exposures estimated as absorbed doses and slope factors expressed as absorbed doses. The same absorption factors used to adjust RfDs are applied in adjusting slope factors.

6.3.3 Mixtures

The USEPA has also developed guidelines to evaluate the overall potential for noncancer and cancer effects posed by multiple chemicals. For the evaluation of noncarcinogenic health effects, this approach assumes that subthreshold exposures to several chemicals at the same time could result in an adverse health effect. The sum of the hazard quotients (for individual chemicals, exposure routes, exposure pathways, or potentially exposed populations) is the hazard index. When the hazard index exceeds 1.0, there may be concern for potential health effects. Generally, hazard indices are only used in the evaluation of a mixture of chemicals that induce the same effect by the same mechanism of action. In this evaluation, the hazard quotients of a mixture of chemicals which can have different effects are used as a screening-level approach, as recommended by the USEPA (1989b). This approach is likely to overestimate the likelihood of adverse, noncarcinogenic health effects.

MALCOLM PIRNIE

 $\sqrt{2}$

 $\tilde{\mathcal{A}}$ $\bar{\psi}$ is $\bar{}$ $\frac{1}{2}$

Ξ, $\ddot{}$ $\frac{1}{2}$ $\ddot{}$

 $\frac{1}{2}$

ú.

For the evaluation of carcinogenic risks, the individual risks associated with exposure to each chemical are summed. This represents an approximation of the precise equation for combining risks which accounts for the joint probabilities of the same individual developing cancer as a consequence of exposure to two or more carcinogens. This additive approach assumes independence of action by the chemicals involved (i.e., that there are no synergistic or antagonistic chemical interactions and all chemicals produce the same effect, i.e., cancer).

6.4 RISK CHARACTERIZATION

The human health risks associated with potential exposure to the chemicals of potential concern for each potentially exposed population, currently and in the future, in the absence of remedial action, are presented in Tables 6-9 to 6-15, summarized in Table 6-16, and discussed below. As described earlier, potential carcinogenic health risks are assessed through the computation of a probability estimate, the likelihood of developing a cancer following exposure to the chemicals of concern under the set of exposure conditions evaluated. Following USEPA guidance (USEPA, 1991), the estimated cancer risks for the resident adult evaluated in the future scenario represent the sum of the cancer risks estimated for 6 years of exposure as a child and 24 years of exposure as an adult.

The estimated risks are compared to the USEPA acceptable levels specified in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (USEPA, 1990). For noncarcinogenic health effects, the NCP states that acceptable exposure levels shall represent concentration levels to which the human population, including sensitive subgroups, may be exposed without adverse effect during a lifetime or part of a lifetime, incorporating an adequate margin of safety. In practice, the USEPA defines this as both hazard quotients and hazard indices less than or equal to 1.0. For known or suspected carcinogens, the NCP states that acceptable exposure levels are generally concentration levels that represent an excess upper bound lifetime cancer risk to an individual of between 10^4 (1 in 10,000) and 10^6 (1 in 1,000,000).

PH2RI.028 02/18/98 02/18/98 2420-017-H41 6-19

6.4.1 Quantitative Assessment: Current Conditions

Adolescent Trespasser: The potential for noncarcinogenic and carcinogenic health effects associated with possible exposure to individual chemicals in surface soil are presented in Table 6-9 in the form of hazard quotients and estimated cancer risks. Hazard indices and estimated cancer risks for the individual routes of exposure are also presented.

The total hazard index (Table 6-16) for adolescent trespasser exposure to the chemicals of potential concern in surface soil from ingestion and dermal contact is 8E-02 (scientific notation for 0.08); this hazard index is less than the USEPA acceptable level of 1.0, indicating that adverse, noncarcinogenic health effects from such exposure are unlikely. The total estimated cancer risk (Table 6-16) is about 6E-07 (scientific notation for 6 in 10,000,000). This risk is less than the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000.

PMC Worker: The potential for noncarcinogenic and carcinogenic health effects associated with possible exposure to individual chemicals in surface soil are presented in Table 6-10 in the form of hazard quotients and estimated cancer risks. Hazard indices and estimated cancer risks for the individual routes of exposure are also presented.

The total hazard index (Table 6-16) for PMC worker exposure to the chemicals of potential concern in surface soil from ingestion and dermal contact is 7E-02 (scientific notation for 0.07); this hazard index is less than the USEPA acceptable level of 1.0, indicating that adverse, noncarcinogenic health effects from such exposure are unlikely. The total estimated cancer risk (Table 6-16) is about • 5E-06 (scientific notation for 5 in 1,000,000). This risk is within the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000.

6.4.2 Quantitative Assessment: Future Conditions

Direct contact exposure by residents is evaluated based on both shallow soil data ("limited residential use") and all soils data ("generic residential use"). As discussed previously, since the exposure assumptions and parameters are the same for each residential use scenario, the estimated risks for the two data sets can be applied to either or both scenarios.

MALCOLM PIRNIE

"Generic Residential Use": The potential for noncarcinogenic and carcinogenic health effects associated with possible exposure to individual chemicals in soils and groundwater are presented in Tables 6-11 and 6-12 for adults and children, respectively, in the form of hazard quotients and estimated cancer risks. Hazard indices and estimated cancer risks for the individual routes of exposure are also presented.

The total hazard index (Table 6-16) for resident adult exposure to the chemicals of potential concern in soils from ingestion and dermal contact and in groundwater from ingestion, dermal contact and inhalation of volatilized chemicals is $1E+00$ (scientific notation for 1.0); this hazard index is equal to the USEPA acceptable level of 1.0. The total estimated cancer risk (Table 6-16) is about 3E-04 (scientific notation for 3 in 10,000). This risk is greater than the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000. Ingestion of vinyl chloride in groundwater is the primary contributor to the estimated cancer risk

The total hazard index (Table 6-16) for resident child exposure to the chemicals of concern in soils from ingestion and dermal contact and in groundwater from ingestion, dermal contact, and inhalation of volatilized chemicals is 3E+00 (or 3); this hazard index is greater than the USEPA acceptable level of 1.0, indicating a potential for adverse, noncarcinogenic health effects. The hazard index for ingestion of groundwater is 2E+00 (or 2), however, none of the hazard quotients for individual chemicals exceed 1.0. The total estimated cancer risk (Table 6-16) is about 1E-04 (or 1 in 10,000). This risk is within the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000.

"Limited Residential Use" - Basement Construction: The potential for noncarcinogenic and carcinogenic health effects associated with possible exposure to individual chemicals in surface soil and indoor air are presented in Tables 6-13 and 6-14 for adults and children, respectively, in the form of hazard quotients and estimated cancer risks. Hazard indices and estimated cancer risks for the individual routes of exposure are also presented.

The total hazard index (Table 6-16) for resident adult exposure to the chemicals of potential concern in surface soil from ingestion and dermal contact and in indoor air from inhalation of chemicals volatilized from subsurface soil and groundwater is 4E-01 (scientific notation for 0.04); this

MALCOLM PIRNIE

hazard index is less than the USEPA acceptable level of 1.0, indicating that adverse, noncarcinogenic health effects from such exposure are unlikely. The total estimated cancer risk (Table 6-16) is about 7E-05 (scientific notation for 7 in 100,000). This risk is within the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000.

The total hazard index (Table 6-16) for resident child exposure to the chemicals of concern in surface soil from ingestion and dermal contact and in indoor air from inhalation of chemicals volatilized from subsurface soil and groundwater is 2E+00 (or 2); this hazard index is greater than the USEPA acceptable level of 1.0, indicating a potential for adverse, noncarcinogenic health effects. None of the hazard indices for the individual exposure routes exceeds 1.0, although the hazard index for ingestion of surface soil is 1. The total estimated cancer risk (Table 6-16) is about 4E-05 (or 4 in 100,000). This risk is within the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000.

"Limited Residential Use" - Foundation Construction: The potential for noncarcinogenic and carcinogenic health effects associated with possible exposure to individual chemicals in surface soil and indoor air are presented in Tables 6-13 and 6-14 for adults and children, respectively, in the form of hazard quotients and estimated cancer risks. Hazard indices and estimated cancer risks for the individual routes of exposure are also presented.

The total hazard index (Table 6-16) for resident adult exposure to the chemicals of potential concern in surface soil from ingestion and dermal contact and in indoor air from inhalation of chemicals volatilized from subsurface soil and groundwater is 4E-01 (scientific notation for 0.4); this hazard index is less than the USEPA acceptable level of 1.0, indicating that adverse, noncarcinogenic health effects from such exposure are unlikely. The total estimated cancer risk (Table 6-16) is about 7E-05 (scientific notation for 7 in 100,000). This risk is within the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000.

The total hazard index (Table 6-16) for resident child exposure to the chemicals of concern in surface soil from ingestion and dermal contact and in indoor air from inhalation of chemicals volatilized from subsurface soil and groundwater is $2E+00$ (or 2); this hazard index is greater than the USEPA acceptable level of 1.0, indicating a potential for adverse, noncarcinogenic health effects.

MAICOIM PIRNIE

None of the hazard indices for the individual exposure routes exceeds 1.0, although the hazard index for ingestion of surface soil is 1. The total estimated cancer risk (Table 6-16) is about 4E-05 (or 4 in 100,000). This risk is within the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000

Construction Worker: The potential for noncarcinogenic and carcinogenic health effects associated with possible exposure to individual chemicals in soils and air are presented in Table 6-15 in the form of hazard quotients and estimated cancer risks. Hazard indices and estimated cancer risks for the individual routes of exposure are also presented.

The total hazard index (Table 6-16) for construction worker exposure to the chemicals of potential concern in surface and subsurface soils from ingestion, dermal contact and inhalation is 1E-01 (scientific notation for 0.1); this hazard index is less than the USEPA acceptable level of 1.0, indicating that adverse, noncarcinogenic health effects from such exposure are unlikely. The total estimated cancer risk (Table 6-16) is about 6E-07 (scientific notation for 6 in 10,000,000). This risk is less than the USEPA acceptable range of 1 in 10,000 to 1 in 1,000,000.

6.4.3 Qualitative Assessment

USEPA-derived toxicological criteria (i.e., RfDs, RfCs, and cancer slope factors for oral and inhalation exposure) are not available to quantitatively assess the potential for human health risks for four chemicals of potential concern: lead, two noncarcinogenic PAHs (benzo[g,h,i]perylene, and phenanthrene) and thallium. Possible health implications that may be associated with exposure to these chemicals are as follows:

Lead: Chronic exposure to low levels of lead may result in hematologic (blood and bloodforming), neurobehavioral, kidney, and other effects in humans (ATSDR, 1993a). Effects such as slowed nerve conduction velocities, altered testicular function, reduced hemoglobin production, and other signs of impaired heme synthesis, and blood pressure effects have been observed in adults. Children, who represent a sensitive portion of the population, may experience an array of pathophysiological effects. Electrophysiological effects, impaired cognitive performance (as measured by IQ tests, performance in school, and other means), heme synthesis impairment, inhibition

PH2RI.028 02/18/98 02/18 2420-017-H41 6-23

MALCOLM PIRNIE

of pyrimidine and alanine synthesis, interference with vitamin D hormone synthesis, and early childhood growth reductions have been observed in children. In addition, factors influencing neurological development such as low birth weights and decreased gestational age and deficits in mental indices have been reported in infants.

For this human health evaluation, assessment of the potential for health effects from lead exposure is made by comparison of lead levels in soil to the USEPA's revised interim screening criterion for lead in soil (400 mg/kg) which the agency considers protective for direct contact at residential settings (USEPA, 1994) and comparison of lead levels in groundwater to the USEPA action level for lead in drinking water (15 ug/1).

Lead was detected in 36 of 36 soil samples, however no samples had concentrations greater than 400 mg/kg. Lead was detected in 4 of 18 groundwater samples, however only one sample (PS-1 OSS at 44.4 ug/1) had a concentration greater than 15 ug/1).

Benzo[g h.i]perylene and Phenanthrene: These two chemicals are among the 17 PAHs typically analyzed for and evaluated at hazardous waste sites; the 17 PAHs often occur together in the environment and many have similar environmental fate and lexicological characteristics (ATSDR, 1993b). However, reliable environmental fate and toxicological information exists for only a few of the 17 PAHs and the potential health effects of the other less well-studied PAHs must be inferred from this information (ATSDR, 1993b). The USEPA (1994a) regards all three chemicals as not classifiable as to carcinogenicity

 $Benzo[g,h,i]$ perylene and phenanthrene were detected in soils. However, these chemicals were detected in concentrations within the concentration range of the other noncarcinogenic PAHs and none of the evaluated noncarcinogenic PAHs pose potential noncancer health risks at the concentrations evaluated. They were not detected in groundwater.

Thallium: Thallium is one of the more toxic metals and can cause neural, hepatic, and renal injury, as well as deafness and loss of vision (Amdur et al., 1991); alopecia (hair loss) is the hallmark of long-term thallium poisoning in humans (Carson et al., 1986). Thallium is absorbed through the skin and the gastrointestinal tract and chronic thallium poisoning shows a long latent period.

MAICOLM PIRNIE

Thallium was detected in 1 of 36 soil samples at a concentration of 0.68 mg/kg and was not detected in groundwater.

6.4.4 Uncertainty Analysis

Some uncertainty is inherent in the process of conducting predictive, quantitative health risk assessments. Environmental sampling and analysis, fate and transport modeling and human exposure modeling are all prone to uncertainty, as are the available toxicity data used to characterize risks.

Uncertainty associated with environmental sampling is generally related to the limitations of the sampling in terms of the number and distribution of samples, while uncertainty associated with the analysis of samples is generally associated with systematic or random errors (e.g., false positive or negative results). For instance, for the subsurface soil (and, therefore, the combined surface and subsurface soils) data sets, the number of samples collected at depth at each sampling location varied. As each sample was considered an independent data point in determining frequency of detection and exposure point concentrations of the chemicals, such utilization of the data could result in bias towards the more frequently sampled locations. Thus exposure may be overestimated or underestimated depending on how well each environmental medium is characterized.

While aspects of the exposure assessment methodology can result in overestimation or underestimation of long-term exposure, exposure is probably overestimated, overall, for the potentially exposed populations evaluated. The exposure point concentrations used in the exposure assessment (i.e., the 95 % UCL on the average concentration or the maximum detected concentration, without consideration of environmental migration, transformation, degradation, or loss) should result in overestimates of long-term exposure. As discussed in Appendix F, concentrations of chemicals of potential concern in air are based on conservative emissions estimation procedures and air dispersion models that likely overpredict the air concentrations.

Assumptions and model input parameters that result in reasonable maximum exposure estimates are used in the exposure assessment; the actual frequencies and durations of exposure would probably be less than evaluated so that long-term exposure should be overestimated. Mode!

MALCOLM PIRNIE

بالأرد

input parameters (e.g., permeability constants) which are influenced by a number of factors may result in overestimates of long-term exposure.

Potential exposure to chemicals in groundwater from dermal contact during showering (or bathing/washing) is based on data from unfiltered water samples and, as chemicals sorbed to particulates in the water may be unavailable for dermal absorption, exposure may be overestimated. Also, potential exposure to VOCs from the inhalation and dermal exposure pathways was conservatively estimated since depletion of VOC concentrations in air once volatilized from the shower water is not considered.

The derivation of health effects criteria that form the basis of the risk characterization can result in overestimates or underestimates of potential health risks. In most cases, the criteria are derived from extrapolation from laboratory animal data to humans. RfDs and cancer slope factors for oral exposure are used as criteria to assess exposure from dermal absorption. While the criteria for oral exposure are adjusted for such use following USEPA guidance, oral absorption for the organic chemicals is assumed to be 100%; this may underestimate dermal contact risks for some chemicals. For those chemicals with specific oral absorption efficiencies, consideration was not given to the absorption efficiency of the exposure vehicle used in the studies on which the toxicity factors is based; this may overestimate or underestimate dermal contact risks for some chemicals. Furthermore, for some chemicals, health criteria are insufficient to determine reference doses or slope factors for oral and/or inhalation exposure. As a result, the overall risks may be underestimated.

Subchronic RfDs are the appropriate toxicological criteria to estimate the potential for noncarcinogenic health effects in construction workers assumed to have exposure over a 2-year period. However, as subchronic RfDs are often lacking or in some cases set equal to chronic RfDs, chronic RfDs are used as conservative approximations; this may overestimate risks for these workers.

Exposure to total chromium in soils is evaluated based on toxicological criteria for Cr III; health risks based on Cr III would be underestimated if some Cr VI was detected in the soil.

6.5 SUMMARY

 \mathcal{L}

The risk assessment addresses the consequences of "reasonable maximum exposure" to site contaminants under current and future conditions in the absence of remedial action. A summary of the risk estimates is presented in Table 6-16.

Based on the assumptions and limitations of this evaluation, none of the exposure pathways and routes considered under current conditions result in risks in excess of the USEPA acceptable levels. Under future conditions, potential exposure of children under all three residential use scenarios evaluated (generic residential use with exposure to soil and groundwater, limited residential use/basement construction with exposure to surface soil and indoor air and limited residential use/foundation construction with exposure to surface soil and indoor air) results in concern for adverse, noncarcinogenic health effects as the hazard indices exceed the USEPA acceptable level. With one exception, none of the hazard indices for the individual exposure routes exceeds 1.0, although the hazard indices for ingestion of shallow soil in the latter two cases equal the USEPA acceptable level. Potential exposure of children assuming generic residential use with exposure to soil and groundwater results in a hazard index greater than the USEPA acceptable level. Ingestion of groundwater is the exposure route of concern although none of the hazard quotients for the individual chemicals in groundwater exceed the USEPA acceptable level. Potential exposure of adults assuming generic residential use with exposure to soil and groundwater results in an estimated cancer risk greater than the USEPA acceptable range. Ingestion of vinyl chloride in groundwater is the primary contributor to the risk estimate. While considered in this risk assessment, potable use of the groundwater is unlikely due to the availability of municipal water supply.

7.0 REFERENCES

- 1. Interim Response Comments for the Petoskey Municipal Wellfield Site. Prepared for the City of Petoskey by McNamee Industrial Services, Ann Arbor, Michigan, January 26, 1994.
- 2. Site Analysis, Petoskey Manufacturing Company-Petoskey, Michigan. Prepared by U.S. EPA Environmental Monitoring Systems Laboratory, Las Vegas Nevada, June 1991.
- 3. Phase I Remedial Investigation Report, Petoskey Manufacturing Company. Prepared for the Michigan Department of Natural Resources by Eder Associates, Ann Arbor, Michigan, December, 1993.
- 4. Phase II Remedial Investigation and Focused Feasibility Study Work Plan for Petoskey Manufacturing Site. Prepared for the Michigan Department of Natural Resources by Malcolm Pirnie, East Lansing, Michigan, March 1995.
- 5. Quality Assurance Project Plan Addendum for Phase II Remedial Investigation and Focused Feasibility Study, Petoskey Manufacturing Site. Prepared for the Michigan Department of Natural Resources by Malcolm Pirnie, East Lansing, Michigan, July, 1995.
- 6. Bouwer, H. and Rice, R.C., 1976. A slug test for determining hydraulic conductivity of unconfined aquifers with completely or partially penetrating wells. Water Resources, v. 12, No. 3, pp. 423-428.
- 7. Hydrogeologic Atlas of Michigan, 1981. Published by Western Michigan University, Department of Geology, Kalamazoo, Michigan, as part of: The United States Environmental Protection Agency, Underground Injection Control Program.
- 8. Interim Environmental Response Division Operational Memorandum #8, Revision 4 Generic Residential Cleanup Criteria. Alan J. Howard, Chief, Environmental Response Division, Michigan Department of Natural Resources. June 5, 1995.
- 9. Michigan Department of Environmental Quality Guidance Document for Verification of Soil Remediation, April 1994.
- 10. Agency for Toxic Substances and Disease Registry. 1993a. Toxicological Profile for Lead. Atlanta, GA: U.S. Public Health Service.

PH2R1.028 02/18/98 02/18 2420-017-H41 7-1

- 11. Agency for Toxic Substances and Disease Registry. 1993b. Toxicological Profile for Polycyclic Aromatic Hydrocarbons. Draft. Atlanta, GA: U.S. Public Health Service.
- 12. Amdur, M.O., J. Doull and C.D. Klaassen (Eds.). 1991. Casarett and Doull's Toxicology. Fourth Edition. New York, NY: Pergamon Press, Inc.
- 13. Carson, B.L., H.V. Ellis, HI and J.L. McCann (Eds.). 1986. Toxicology and Biological Monitoring of Metals in Humans. Chelsea, MI: Lewis Publishers, Inc.
- 14. Dragun, J. and A. Chiasson. 1991. Elements in North American Soils. Greenbelt, MD: Hazardous Materials Control Resources Institute.
- 15. Gilbert, R.O. 1987. Statistical Methods for Environmental Pollution Monitoring. New York, NY: Van Nostrand Reinhold. 320 p.
- 16. Michigan Department of Environmental Quality. 1996. May 14, 1996 letter from Ms. Beth O'Brien (Project Manager, Superfund Section, Environmental Response Division) to Ms. Terese Van Donsel (USEPA, Region 5).
- 17. Michigan Department of Environmental Quality. 1995a. Interim Environmental Response Division Operational Memorandum #8, Revision 4: Generic Residential Cleanup Criteria.
- 18. Michigan Department of Environmental Quality. 1995b. Environmental Response Division Operational Memorandum #14, Revision 2: Remedial Action Plans Using Generic Industrial or Generic Commercial Cleanup Criteria and Other Requirements.
- 19. U.S. Environmental Protection Agency. 1997a. Health Effects Assessment Summary Tables. FY-1997 Update. EPA-540-R-97-036. Washington, DC: Office of Solid Waste and Emergency Response.
- 20. U.S. Environmental Protection Agency. 1997b. Integrated Risk Information System (IRIS). Accessed through the National Library of Medicine TOXicology data NETwork (TOXNET).
- 21. U.S. Environmental Protection Agency. 1997c. National Center for Environmental Assessment.. Cincinnati, OH: Office of Research and Development.
- 22. U.S. Environmental Protection Agency. 1994. Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities. OSWER Directive # 9355.4-12. Washington, DC: Office of Solid Waste and Emergency Response.

- 23. U.S. Environmental Protection Agency. 1993. Provisional Guidance for Quantitative Risk Assessment of Polycyclic Aromatic Hydrocarbons. EPA 600-R-93-089. Washington, DC: Office of Research and Development.
- 24. U.S. Environmental Protection Agency. 1992a. Dermal Exposure Assessment: Principles and Applications. Interim Report. EPA/600/8-91/01 IB. Washington, DC: Office of Research and Development.
- 25. U.S. Environmental Protection Agency. 1992b. Supplemental Guidance to RAGS: Calculating the Concentration Term. Publication 9285.7-08. Washington, DC: Office of Solid Waste and Emergency Response.
- 26. U.S. Environmental Protection Agency. 1991. Risk Assessment Guidance for Superfund Volume I: Human Health Evaluation Manual. Supplemental Guidance "Standard Default Exposure Factors". Interim Final. OSWER Directive: 9285.6-03. Washington, DC: Office of Emergency and Remedial Response.
- 27. U.S. Environmental Protection Agency. 1990. National Oil and Hazardous Substances Pollution Contingency Plan; Final Rule. 40 CFR Part 300. Federal Register. 55(46): 8666- 8865.
- 28. U.S. Environmental Protection Agency. 1989a. Exposure Factors Handbook. EPA/600/8- 89/043. Washington, DC: Office of Health and Environmental Assessment.
- 29. U.S. Environmental Protection Agency. 1989b. Risk Assessment Guidance for Superfund Volume I: Human Health Evaluation Manual (Part A). Interim Final. EPA/540/1-89/002. Washington, DC: Office of Emergency and Remedial Response.

PH2RI.028 02/18/98 2420-017-H41 7-3

 $\frac{1}{\dot{r}}$

 $\frac{1}{4}$

TABLES

 \ddotsc

 \overline{a}

 \sim

ш. \sim

 \sim l.

TABLE 2-2 PETOSKEY MANUFACTURING SITE

 \mathcal{A} and the set of the set of

Slug Test Results

Hydraulic Conductivity (K) Values

Hydraulic conductivity values are in cm/sec

 $\sqrt{ }$

TABLE 3-1 PETOSKEY MANUFACTURING SITE Soil Vapor Extraction Pilot Test Field Gas Chromatograph Screening Results

 $\overline{}$

 \bar{z} \bar{L}

 \mathbf{x}_{max}

 \bar{z}

 $\ddot{}$ $\dot{\tau}$

 \sim \sim

TABLE 3-2 PETOSKEY MANUFACTURING SITE Aquifer Pumping Test Field Gas Chromatograph Screening Results

Notes:

 $\overline{\mathbf{r}}$ \bullet

 $\frac{1}{2}$

 $\frac{1}{2}$ \mathbf{r}

 $\frac{1}{2}$ L.

u is \pm \sim IN - Influent to carbon

EF - Effluent from carbon

Samples labelled 1, 10, 100, and 1000 were collected 1, 10, 100, and 1000 minutes after starting the pumping test.

Other samples were collected on date indicated (10-5 is October 5) in morning (1) or evening (2)

ND - Not Detected

TABLE 5-1 PETOSKEY MANUFACTURING REMEDIAL INVESTIGATION SOIL SAMPLE BACKGROUND CALCULATIONS

BACKGROUND CONCENTRATIONS CALCULATIONS

 $n=6$

 $\overline{1}$

For non-detect values:

- it less than 50% of the background data is below the DL, use one-half of the DL as the value

if more than 50% of the background data is below the DL use Alternate "0" and the DL resulting in a net value of one-half of the detection limit with a variance.

 \rightarrow

Tong 1 or

 \mathbf{L}

TABLE 5-2 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - VOLATILE ORGANIC COMPOUNDS

Tab5-2 xls

 $\overline{}$

 $\left| \right\rangle$

 $2/18/98$

 \mathcal{F}

TABLE 5-2 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - VOLATILE ORGANIC COMPOUNDS

Llotes:

20X GSI criterion - Amended version (November 3 1997) to Operational Memorandum «8. Revision 4 (June 5. 1995) GSI SWP criterion - Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995) Residential 20X DW criterion - Operational Memorandum #8, Revision 4 (June 5. 1995) : Pesidential SWP DW criterion - Addenda (January 17, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995) Site Specific Background State Background. MERA Operational Memorandum »15 Default Type A Cleanup Criteria, September 30. 1993 r« Justrial 20X DW criterion Environmental Response Division Operational Memorandum #14 Revision 2. June 6. 1995 iri.lustnal 20X Aes'hetic drinking water value Environmental Response Division Operational Memorandum #M Revision 2, June 6. 1995

" injustial SWP DW Criterion - Drart numbers received on December 3. 1997 from MDEQ staff toxologist

20X GSI Criterion Operational Memorandum #8. Revision 4 (June 5: 1995).

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values

A blank cell indicates no criterion tor that parameter

Exceedances are bolded.

n Tentatively identified compounds present

' Interim value, currently under review

NIL - Chemical is not likely to leach under most soil conditions

IP - Development of generic GSI value in process but not yet complete.

ID - Insufficient data for calculation

|B) - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

B - Analyte detected in the associated blank

J - Estimated value.

X • Indicates manual data entry.

E - Concentration exceeds the calibration range of the instrument

< - indicates that analyte was not detected at detection limit given

k Data not broken down into isomers so the most conservative criteria was used which is cis.

1 Chemical may be present in several isomer forms Isomer specific concentrations must be combined for comparison to criteria.

TABLE 5-3
PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS

Tab5-3 xls

 \pm

 $\omega_{\rm c}$, where $\omega_{\rm c}$

 \mathcal{L}

TABLE 5-3 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS

Notes

20X GSI criterion - Amenued version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

² GSI SWP criterion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

³ Residential 20X DW criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

4 Residential SWP DW criterion - Addenda (January 17, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)

⁵ Site Specific Background

⁶ State Background, MERA Operational Memorandum #15 Default Type A Cleanup Criteria, September 30, 1993

7 Industrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

⁸ Industrial 20X Aesthetic drinking water value - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

Findustial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

¹⁰ Direct Contact Values were used because parameters are not expected to leach

¹¹ Residential 20X DW criterion were used because parameters are expected to leach

120X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values ex ,eeded those values

A blank cell indicates no oriterion for that parameter.

Exceedances are bolded.

Diesel Range Organics. Gas Range Organics and Total Petroleum Hydrocarbons have no established oriterion. The results are presented in mg/kg.

⁴ Tentatively identified compounds present

* Interim value, currently under review

NLL - Chemical is not likely to leach under mast soil conditions

IP Development of generic GSI value in process but not yet complete

ID - Insufficient data for calculation

B - Analyte detected in the associated blank

{8} - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

J. Estimated value

 $\langle \cdot \rangle_{\rm{vec}}$ is \sim

X - Indicates manual data entry

E - Concentration exceeds the calibration range of the instrument

< indicates that analyte was not detected at detection limit given

TABLE 5-4 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - PESTICIDES AND PCBs

 \prime

Notes.

20X GSI criterion - Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)

 $^{\circ}$ GSI SWP criterion - Amenided version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995).

Residential 20X DW criteriori - Operational Memorandum #8. Revision 4 (June 5, 1995).

⁴ Residential SWP DW criterion - Addendra (January 17, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995).

¹ Site Specific Background

¹ State Background, MERA Operational Memorandum #15 Default Type A Cleanup Criterial September 30, 1993

Industrial 20X DW criterion Erivironmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

1 Industrial 20x Aesthetic drinking water value - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

² Industial SWP DW Criterion - Craft numbers received on December 3, 1997 from MDEQ staff toxologist

² Direct Contact Values were used because parameters are not expected to leach

Residential 20X DW criterion were used because parameters are expected to leach

7 20X GSI Criterion Operational Memorandum #8, Revision 4 (June 5, 1995)

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values

A blank cell indicates no criterion for that parameter

Direct Conatct Values were used because they are more conservative than ambient air for industrial generic soil criteria.

TABLE 5-4 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - PESTICIDES AND PCBs

 \sim

Exceedances are bolded.

- " Tentatively .aentrfied compounds present
- interim value, currently under review
- NLL Chemical is not likely ^fo 'each under most soil conditions
- IP Development of generic GSi value m process but not ye' complete
- ID insufficient data 'or calculation
- {B} Chemical has either not been evaluated or an inadequate data base precludes the development of a GSi value
- B Anaiyte defected m me associated Diank.
- j Estimated value
- P more tnan 7^% rlitterence m deterred concentrations between 'he two GC columns Lower result is reported
- M quantrtarion limit elevated due to matrix mterference
- X indicates manual data entry
- £ Concentration exceeds trie calibration tange o' fhe instrument
- ,- indicates that anaiyte was not detected at detection limit given.
- * Dafa not broken down into isomers so the most conservative criteria was used which is cts.
- . Chemical may be present in several isomer forms I Isomer specific concentrations must be combined for comparison to cirteria
- {j} Chemical may be present in several isomer forms Isomer specific concentrations must be combined lor comparison to criteria.
- (T) Toxic Substances Control Act. Subpart G-PCB Spill Cleanup Policy standards may be more restrictive.

TABLE 5-5 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - METALS AND CYANIDE

Notes.

20x GS criterion. Amendert version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995).

: GSI SWP arterion - Ameridad version (November 3-1997) to Operational Momorondum #8. Revision 4 Clune 5-1995)

Residential 20X DW arterion. Operational Memorandum #8, Revision 4 (June 5, 1995).

¹ Residential SWP DW criterion. Addenda (January 17, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995). Site Specific Background

State Background: MERA Operational Memorandum #15 Default Type A Cleanup Criteria, September 30, 1993

.
Industrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

* Industrial 20X Aesthetic diinking water value Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

Industial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

⁹ Direct Contact Values were used because parameters are not expected to leach.

Residential 20X DW criterion were used because parameters are expected to leach

220x GSI Criterion - Operational Memorandum #8 Revision 4 (June 5, 1995)

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values A bignk cell indicates no criterion for that parameter

Direct Conatict Values were used because they are more conservative than ambient air for industrial generic soil criteria

Exceedonces are bolded

 Δ

⁴ Tentatively identified compounds present

- * Interim value, currently under review
- NLL Chemical is not likely to leach under most soil conditions.
- IP Development of generic GSI value in process but not vet complete.
- ID Insufficient data for calculation
- (B) Chemical has either not been evaluated or an incidequate data base precludes the development of a GSL cau.
- B Analyte detected in the associated blank
- J Estimated value
- IP more than 25% difference in detected constentrations between the two GC columns. Lower result is reported
- M quantifation limit elevated due to matrix interference.
- X Indicates manual data entry
- E Concentration exceeds the calibration range of the instrument
- <- indicates that analyte was not detected at detection limit given

TABLE 5-6 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - VOLATILE ORGANIC COMPOUNDS TENTATIVELY IDENTIFIED COMPOUNDS

Notes:

All units are ug/kg.

Sample I.D. indicates boring location and depth - 201S-0-2 indicates sample c from a depth of 0 to 2 feet below ground level.

J - Estimated value.

N - Identification based on mass spectral library search.

لد ـ

ن

 $\mathcal{A}^{(1)}_{\mathcal{A}^{(2)}}$

 $\sim 3^{\circ}$

TABLE 5-7 PETOSKEY MANUFACTURING COMPANY SITE SOIL SAMPLING - AUGUST 1995 ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS **TENTATIVELY IDENTIFIED COMPOUNDS**

All units are ug/kg.

Sumple (Ciindicates boring loi, shon and depth. 2013-0-2 indicates sample)

gollected from boring \$B-201\$ from a depth of 0 to 2 teet helow ground level.

A - Suspected aldol condensation product

B- Analyte was detected in the associated blank

 $\mathbb E \cdot \mathsf{Concentration}$ exceeds the calibration range of the instrument.

I Estimated value

N - Identification based on mass spectral library search

U. Indicates that analyte was not detected at detection limit given

 \sim \sim \sim

TABLE 5-8 PETOSKEY MANUFACTURING COMPANY SITE SURFACE SOIL SAMPLING - SEPTEMBER 1992 ANALYTICAL DATA - VOLATILE ORGANIC COMPOUNDS

Notes.

20X GSI citterion - Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)

² GSI SWP criterion - Amended version (November 3: 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

 3 Residential 20X DW criterion - Operational Memorandum #8. Revision 4 (June 5, 1995).

4 Residential SWP DW cirrenori - Addenda (January 17, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

⁴ Site Specific Background

⁵ State Background, MERA Operational Memorandum #15. Default Type A Cleanup Criteria. September 30, 1993.

Industrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

1 Industrial 20X Aesthetic drinking water value - Environmental Response Division Operational Memorundum #14 Revision 2 June 6, 1995.

² industial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

 $^{\mathrm{th}}$ Direct Contact Values were used because parameters are not expected to leach

¹⁷ Residential 20X DW criterion were used because parameters are expected to leach.

¹² 20X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values

A blank cell indicates no criterion for that parameter

Exceedances are bolded.

Diesel Range Organics, Gas Range Organics and Total Petroleum Hydrocarbons have no established criterion

A fentatively identified compounds present

* Interim value, currently under review.

TABLE 5-s PETOSKEY MANUFACTURING COMPANY SITE SURFACE SOIL SAMPLING - SEPTEMBER 1992 ANALYTICAL DATA - VOLATILE ORGANIC COMPOUNDS

Á

NIL - Chemical is not likely to leach under most soil conclitions

tP Development of generic G5I value m process but HOT yet complete

ID insufficient data (Of calculation

B Anaiyte detected m the associated blank

{B} • Chemical has e*ther not been evaluated or an inadequate data base precludes the development of a GSl value

 \ddot{t}

J Estimated value

X indicates manual data entry

b Concentration exceeds the calibration range of the instrument

* indicates thai analyte was not detected at deter Men limit given

TABLE 5-9 PETOSKEY MANUFACTURING COMPANY SITE SURFACE SOIL SAMPLING - SEPTEMBER 1992 ANALYTICAL DATA - METALS AND CYANIDE

 $\left| \right|$

Notes.

20X 35) interion. Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995).

 \mathbf{r}

* GSI SWP cities in - Amended version (November 3, 1997) to Operational Memorandum #8, Pevision 4 (June 5, 1995).

² Residential 20X DW criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

⁴ Residential SWP DW criterion Addenda (January 17, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995).

¹ Site Specific Background

* State Background, MERA Operational Memorandum #15. Default Type A Cleanup Criteria, September 30, 1993.

.
Tindustrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

* Industrial 20X Aesthetic drinking water value - Environmental Response Division Operational Memorandum #14 Revision 2. June 6. 1995.

² Industial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

¹⁵ Direct Contact Values were used because parameters are not expected to leach

¹¹ Residential 20X DW cirterion were used because parameters are expected to leach

¹² 20X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995).

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values

A blank cell indicates no criterion for that parameter

Exceedances are bolded.

 $\omega_{\rm{max}}$

Diesel Range Organics, Gas Range Organics and Total Petroleum Hydrocarbons have no established ciliterion

⁴ Tentatively identified compounds present

* Interim value, currently under review

TABLE 5-9 PETOSKEY MANUFACTURING COMPANY SITE SURFACE SOIL SAMPLING - SEPTEMBER 1992 ANALYTICAL DATA - METALS AND CYANIDE

 $\mathcal{A}^{\text{max}}_{\text{max}}$ and $\mathcal{A}^{\text{max}}_{\text{max}}$

 $\left| \right|$

NIL Chemical is not likely to leach under most 5011 conditions

iP • Development of generic GSI value in process but nof yef compare

iD - insufficient data fo< calculation

B Analyse detected in the associated blank

{B} - Chemical has either not been evaluated or an inadequate data base precludes the development ot a GSI value

 \mathbf{I}

j • Fstimated value

 \mathcal{A} is a set of \mathcal{A}

X • Indicates manual da'a entry

E Comientrarion exceeds the calibration range o' the instrument

 \cdots indicates that analyte was not detected at detection limit given.

 \bar{z}

Notes.

20x (JSI criteriori - Ameridea versi n. (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995) GSI SWP criteriori - Arner cent version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)

TA-sidential 20X DW criterior - Caperational Memorandum #8. Revision 4 (June 5, 1995).

Researched DVP DW Insteam - A ble rebis(udrigidity 17, 1992) to Special Institutemorphoging #8. Research 1926-1995.

Site Specific Background

State Background, MERA Cit (National Memorgridum #15) Detguit (vpe A Cleanicp Carena, September 30, 1993)

Terestring ZDX DW caterdini, Environmental Response Division Operatorial Memorandum #14 Revision 2, June 6, 1995.

inidustrial (19) Aesthinten der king wicher value - Environmental Respunse Division Operational Memorandum #14 Revision 2, June 6, 1995

Industion SWP DW Chrenon - Likelt numbers received on December 3, 1997 from MDEQ staff toxelcigist

They're increased Malues were called by the parameters are not expected to leadh.

Pesidential 29 CDW criterium were used because parameters are expected to leach.

20x 39 Chterion Ciperation of Memorandum #8, Revision 4 (June 5, 1995).

industrial PCV and Readential DCV columns were not included in this table because none of the Maximum Defection Values exceeded those values

A blight, jet indicates no caterian for that parameter.

ixceedances are bolded.

ussel Range Organics. Gas Runge Diganics and Total Petroleum Hydrocarbons have no established cirileiron.

* Tentatively identified compounds present.

Interim value, currently under review.

all. Chemical is not likely to leach under must soil conditions.

P. Covelopment of generic GSI value in process but not vet complete.

13. Insufficient data for calculation.

+ Analyte detected in the associated blank.

[B] Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

J - Estimated value

Indicates manual data entry

- Concentration exceeds the calibration range of the instrument.

indicates that analyte was not detected at detection limit given.

Data not broken down into isomers so the most conservative criteria was used which is cis-

Chemical may be present in several isomer forms i somer specific concentrations must be combined for comparison to criteria.

TABLE 5-11 PETOSKEY MANUFACTURING COMPANY SITE SUBSOIL SAMPLING - SEPTEMBER 1992 ANALYTICAL DATA - SEMIVOLATILE ORGANIC COMPOUNDS

三、土

20x-56 unter only American varsion (Novembar 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)

- . GSI SWP chreech Amenged version (November 3, 1997) + ; Coergriphal Memorandum #8. Revision 4 (June 5, 1995)
- .
"Residential 20X DW criterion Oberghan al Memorandum #8. Revision 4 (June 5, 1995).
- Residential SWP DW order on Addenaal (January 17, 1997) to Operational Memorandum #9, Pevision 4 (June 5, 1995). Site Specific Background
- State Background, MERA Operational Memorandum #15 Detault Type A Cleanup Criteria, September 30, 1993.
- Industrial 20X DW criterion Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995
- Tingustrial 20X Aesthetic annieng water value Environmental Response Division Operational Memorandum #14 Revision 2, June 1 Drata not broken down into isomers so the most conservative interior was assigned by signed
- Industial SWP DW Criterion Draft numbers received on December 3, 1997 from MDEQ staff toxologist
- Eirect Contact Values were used because parameters are not expected to leach.
- Residential 20X DW criterion were used because parameters are expected to leach.
- 120X GSI Criterion Operational Memorandum #8, Revision 4 (June 5, 1995).
- Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values
- A blank cell indicates no criterion for that parameter.

Exceedances are bolded.

Diesel Range Organics, Gas Range Organics and Total Petroleum Hydrocarbons have no established criterion.

- ^ Tentatively identified compounds present
- * Interim value, currently under review.
- NLL Chemical is not likely to leach under most soil conditions.
- IP Development of generic GSI value in process but not yet complete
- Di-Insufficient data for calculation.
- B. Analyte detected in the associated blank.
- gB) Chemical nasiedher conceen eu più sted ar an indidio avatoria and cae preci udentrio, sever
- Fistimated value
- X Indicates manual data entry
- E Concentration exceeds the calibration range of the instrument.
- k indicates that analyte was not defected at detection limit given
- Chemical may be present in several somer forms. Isomer spen fic concentrations must be concomparison to criteria.

$IAB_{LE} 5-11$ PETOSKEY MANUFACTURING COMPANY SITE SUBSOIL SAMPLING - SEPTEMBER 1992 ANALYTICAL DATA - SEMIVOLATILE ORGANIC COMPOUNDS

j.

Notes

- 22X (35) or tendo. Amenders Leroon (Nevember 3, 1997) to Ciperational Memorandum #8. Revision 4 (June 5, 1995)
- (93) SWP orterion Amended version (November 3, 1997) to Dperational Memorandum #8, Revision 47 June 5, 1995)
- Residential 20X EW silferior Coerational Memorandum #8. Revision 4 (June 5, 1995)
- ¹ Pesidential SWP DW coder on Addenda (January 17, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995). Site Specific Background
- . State Background: MERA: Cicerptional Memorangum #15. Default Type A Cleanup Criteria, September 30, 1993.
- Industrial 20X DW criterion Environmental Response Division Operational Memorandum #14 Revision 2 June 6, 1995
- Tindustrial 20X Aestheric denking water value Environmental Response Division Operational Memorandum #14 Revision 2, June 1 Data not broken down into somer as the most conferivative criterial was select to the 1203-3
- "Industial SWP DW Criterion". Draft numbers received on December 3, 1997 from MDEQ staff toxologist
- Direct Contact Values were used because parameters are not expected to leach
- Residential 20X DW criterion were used because parameters are expected to leach
- 120X GSI Criterion Operational Memorandum #8, Revision 4 (June 5, 1995).
- Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values
- A blank cell indicates no criterion for that parameter.

Exceedances are bolded.

- Diesel Range Organics, Gas Range Organics and Total Petroleum Hydrocarbons have no established criterion.
- ^A Tentatively identified compounds present.
- * Interim value, currently under review
- NLL Chemical is not likely to leach under most soil conditions.
- IP Development of generic GSI value in process but not yet complete.

ID - Insufficient is stalker calculation.

- B. Anglyte determination the arscorded biggs.
- (B) Chemical has writen was been invaluated or an incrae party, activity are previously the laeve of
- J Estimated value
- X Indicates manual data entry
- E Concentration exceeds the calibration range of the instrument.
- ik indicates that analyte was not literated at detection limit given. Chemical may be present in several isomer forms. Isomer specific can nentrat christian concrete comparson to criteria.

Notes.

200 CSI criterion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995) (D - Insufficient data for calculation

⁴ GSI SWP criterion - Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995) B - Analyte detected in the associated biank

(B) - Chemical has either not been evaluated or an inadequate data base precludes the develop ² Residential 20X DW criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

4 Residential SWP DW criterion - Addenda (January 17, 1997) to Operational Memorandum #8, Revision 4 (June 5, 199J - Estimated value

³ Site Specific Background

X - Indicates manual data entry

comparison to criteria.

Chemical may be present in several isomer forms. Isomer specific concentrations must be comb

^o State Background, MERA Operational Memorandum #15 Default Type A Cleanup Criteria, September 30, 1993 E - Concentration exceeds the calibration range of the instrument

Cindustrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995 < - indicates that analyte was not detected at detection limit given

a Industrial 20X Aesthetic drinking water value - Environmental Response Division Operational Memorandum #14 Revist Data not broken down into isomers so the most conservative cirteria was used which is cis-

^Y Industial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

" Direct Contact Values were used because parameters are not expected to leach.

¹¹ Residential 20X DW criterion were used because parameters are expected to leach.

14 20X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995).

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Defection Values exceeded those values

A blank cell indicates no criterion for that parameter

Exceedances are bolded.

Diesel Range Organics, Gas Range Organics and Total Petroleum Hydrocarbons have no established criterion.

^ Tentatively identified compounds present.

* Interim value, currently under review

NLL - Chemical is not likely to leach under most soil conditions

IP - Development of generic GSI value in process but not yet complete.

Notes

20X GSI enterion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995).

1691 SWP criterion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

Residential 20X DW chrerion - Operational Memorandum #6, Revision 4 (June 5, 1995).

" Residential SWP DW criterion - Addenda (January 17, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

¹ Site Specific Background

¹ State Background: MERA Operational Memorandum #15: Default Type A Cleanup Criteria, September 30, 1993

Industrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

1 Industrial 20X Aesthetic drinking water value - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

Industial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

Direct Contact Values were used because parameters are not expected to leach.

Residential 20X DW criterion were used because parameters are expected to leach.

20X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values

A blank cell indicates no criterion for that parameter

Exceedances are bolded.

^A Tentatively identified compounds present

 $\omega_{\rm{max}}$

 $\ddot{\ }$

* interim value, currently under review

NIL - Chemical is not likely to leach under most soil conditions

IP - Development of generic GSI value m process but not yet complete

ID insufficient data for calculation

B • Anaiyte detected m me associated blank

(B) - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

j Es'imatfid value

X indicates manual data entry

t - Concentration exceeds the calibration range of the instrument

•.. - indicates that anaiyte was nor detected at detection limit given

comparison to criteria

 \mathbf{r}

Notes

20X GSI criterion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

1/GSI SWP criterion - Amerided Version (November 3: 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

¹ Residential 20X DW criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

⁴ Residential SWP DW criterion - Addenda (January 17, 1997) to Operational Memorandum #8, Revision 4/June 5, 1995).

¹ Site Specific Background

^ State Background, MERA Operational Memorandum #15 Default Type A Cleanup Criteria, September 30, 1993

Industrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

² Industrial 20X Aesthetic drinking water value - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

1 Industial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

" Direct Contact Values were used because parameters are not expected to leach

" Residential 20X DW criterion were used because parameters are expected to leach

¹⁴ 20X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Defection Values exceeded those values

A blank cell indicates no criterion for that parameter

Exceedances are bolded.

^A Tentatively identified compounds present

 \mathcal{L}

* interim value, currently under review

NLL - Chemical is not likely to leach under most soil conditions

IP - Development of generic GSi value in process Dut not yet complete.

ID - Insufficient data for calculation

B - Anaiyte detected in the associated blank.

{6} - Chemicaf has either not been evaluated or an inadequate data base precludes the development of a GSI value.

j - Estimated value.

X - Indicates manual data entry

E - Concentration exceeds the calitxarion range of the msfrumenf.

< - indicates that anaiyte was not detected at detection limit given,

comparison to criteria

Notes

20X GSI criterion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995) "

. GSI SWP criterion - Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5-1995)

¹ Residential 20X DW criterion - Operational Memorandum #8, Revision 4 (June 5, 1995).

⁴ Residential SWP DW criterion - Addenda (January 17, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)

Site Specific Background

State Background, MERA Operational Memorandum #15. Default Type A Cleanup Criteria. September 30, 1993.

Industrial 20X DW criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June (, 1995

⁵ Industrial 20X Aesthetic drinking water value - Environmental Response Division Operational Memorandum #14 Revision 2. June 6, 1995.

* Industial SWP DW Criterion - Draft numbers received on December 3, 1997 from MDEQ staff toxologist

¹⁹ Direct Contact Values were used because parameters are not expected to leach

" Residential 20X DW criterion were used because parameters are expected to leach.

11 20X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995).

Industrial DCV and Residential DCV columns were not included in this table because none of the Maximum Detection Values exceeded those values.

A blank cell indicates no criterion for that parameter

Exceedances are bolded.

⁴ Tentatively identified compounds present

* Interim value, currently under review

NIL - Chemical is not likely to leach under most soil conditions

IP - Development of generic GSi value m process but not yet complete

ID - Insufficient data for calculation

B - Analyte detected m the associated blank

{B} - Chemical has either not been evaluated or an inadequate dafa base precludes fhe development o^f a GSi value

J - Estimated value

X - indicates manual data entry

E - Concentration exceeds the calibration range of the instrument

< - indicates tnat anaiyte was not detected at detection limit given

comparison ro criteria

 \mathcal{A}^{\pm}

 ~ 0

 $\omega = \omega / \omega$.

 \overline{C}

 $\left($

 \sim

 $m6,13$ on

Notes

- Residential DW Criterion Interim Environmental Response Division Operational Memorandum #8, Revision 4, Generic Residential Cleanup Criteria, June 5, 1995
- ? Residential Aesthetic drinking water cirterion Interim Environmental Response Division Operational Memorandum #8, Revision 4: Generic Residential Cleanup Criteria, Juine 5, 1995
- ³ Site Specific Background
- State Background, MERA Operational Memorandum #15 Detault Type A Cleanup Criteria, September 30, 1993
- GSI criterion Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)
- Industrial DW Criterion Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.
- ⁷ industrial Aesthetic drinking water criterion Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.
- ⁸20X GSI Criterion Operational Memorandum #8, Revision 4 (June 5, 1995).

Exceedances are bolded.

Groundwater Contact Criteria was not included in this table because there were no detection limits which exceeded the criteria

Protective of Industrial Drinking Water values were included only if they differed from the Protective of Residential Drinking Water Values

- A blank cell indicates that compound is not addressed in Operational Memorandums
- < indicates that analyte was not detected at detection limit given
- NA Net analyzed for given parameter
- NR Parameter not reported

J - Estimated value

(B) - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

- B Analyte present in method blank
- ID Insufficient data for calculation
- IP Development of generic GSI value in process but not yet complete
- A Tentatively identified compounds present
- ⁶ Data not broken down into isomers so the most conservative criteria was used which is cis.
- Chemical may be present in several isomer forms Isomer specific concentrations must be combined for comparison to criteria

 $\sim 10^{-1}$

 $\overline{1}$

 $\tau_{\Delta \text{DE}}$ (τ) ω

ţ

Notes.

Residential DW Criterion Interim Environmental Response Division Operational Memorandum #8, Revision 4, Generic Residential Cleanup Criteria, June 5, 1995

Pesidential Aesthetic drinking water criterion Unterim Environmental Response Division Operational Memorandum #8, Revision 4, Generic Residential Cleanup Criteria, June 5: 1995 Site Specific Backaround

¹ State Background, MERA Oberational Memorandum #15, Defizult Type A Cleanup Criteria, September 30, 1993.

33. Interior: Amended version (November 3, 1997) to Ciperational Memorandum #8, Revision 4 (June 5, 1995).

Tingusting DW Ortenion - Environmental Response Division Operational Mercorandum #14 Revision 2 June 6, 1995.

Indistrict Aesthetic dircking water criterion. Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

 $^{-3}$ (Si "Interior - Operational Memorandum #8, Peuision 4 (June 5, 1995).

Exceedances are bolded.

stroundwater Contact Criteria was not included in this table pec you there were no detection limits which excemted the criteria

Protective of inqustrial Drinking Water values were included only if they altered from the Protective of Residential Drinking Water Values

A bignik ciell indicates that compound is not agaressed in Operational Memorandums.

Diesel Range Organics and Total Petroleum Hydrocarbijns have nu established cirrenon. The results are presented in mg/l

in indicates that analyte was not detected at detection limit given

- tiR Parameter not reported
- J Estimated value

(B) - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

- B. Analyte present in method blank
- ID insufficient data for calculation.
- IP. Development of generic GSI value in process but not yet complete.
- ¹ Tentatively identified compounds present

⁶ Data not broken down into isomers so the most conservative criteria was used which is cis-

Chemical may be present in several isomer forms. Isomer specific concentrations must be combined for comparison to criteria.

TABLE 5-17 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - VOLATILE ORGANIC COMPOUNDS TENTATIVELY IDENTIFIED COMPOUNDS (TICs)

All units are ug/l.

J - Estimated value.

N - Identification based on mass spectral library search.

 $\overline{}$

 $\frac{1}{\sqrt{2}}$

 τ 5

45

ل بارستان
مواليات

TABLE 5-18
PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS TENTATIVELY IDENTIFIED COMPOUNDS (TICs)

 \sim

 Λ

 \sim

THER TRUL

TABLE 5-18 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS TENTATIVELY IDENTIFIED COMPOUNDS (TICs)

 $\overline{ }$

 \sim

All units are ug/'

< - indicates that analyte was not detected at detection limit given

B Analyse detected in the associated blank

J - Estimated value

N - identification based on mass spectral library search

TABLE 5-18 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS TENTATIVELY IDENTIFIED COMPOUNDS (TICs)

ť

TABLE 5-18 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS TENTATIVELY IDENTIFIED COMPOUNDS (TICs)

 Λ

 $\frac{\epsilon}{\Gamma}$

All units are ug/i

< • incJicates that analyse was nc

B - Analyte detected in the asso

J - Estimated value

 $\sim 10^{11}$ and $\sim 10^{11}$

N • identification based on mass

TABLE 5-14
PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995
GROUNDWATER SAMPLING - OCTOBER 1995
ANALYTICAL DATA - SEMI-VOLATILE ORGANIC COMPOUNDS

 $\frac{1}{4}$

 \langle

CARS TAILE

 $\overline{1}$

Notes

.
Residential DW Criterion - Interim Environmental Response Division Operational Memorandum #8, Revision 4: Generic Residential Cleanup Criteria, June 5, 1995.

 $\mathbf{1}^{\prime}$

Presidential Aesthetic crinking water arterion - Interim Environmental Response Division Operational Memorandum #8, Revision 4, Generic Residential Cleanup Criteria, June 5, 1975.

³ Site Specific Background

¹ State Background, MERA Operational Memorandum #15, Default Type A Cleanup Criteria, September 30, 1993.

1950 Interior - Arcended Jerson (Nuvember 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995).

1 in dustries DW, Chtter on - Environmential Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

Industrial Aesthetic diinking water cilterion - Environmental Response Division Oberational Memorandum #14 Revision 2, June 6, 1995

1.53 Citterion - Constitional Membrandum #8, Revision 4 Clube 5, 1995).

Exceedances are bolded.

Gesundwater Contact Criteria was not included in this table because there were no detection limits which exceeded the oriterial

Pretinctive of Industrial Drinking Water values were included only if they differed from the Protective of Residential Dricking Water Values.

A blunk cell indic afes that compound is not audressed in Operational Memorandums.

Diesel Range Organics and Tutal Petroleum Hydrocurbons have no established criterion. The results are presented in majil

- indicates that analyte was not detected at detection limit given.

- NR Parameter not reported.
- subvibetomina L

(B) Chemical has either not been evaluated or an inadequate data base preciudes the development of a GSI valu-

- **B** Andlyte present in method blank
- ID Insufficient data for calculation
- IP. Development of generic GSI value in process but not yet complete.
- n Tentatively identified compounds present

* Data not broken down into isomers so the most conservative criteria was used which is cis-

Chemical may be present in several isomer forms - isomer specific concentrations must be combined for comparison to criteria

Ť

 ϵ

Notes

Presidential DW Criterion - Interim Environmental Response Division Operational Memorandum #8, Revision 4: Generic Residential Cleanup Criteria, June 5, 1995

2 Residential Aesthetic drinking water criterion - Interim Environmental Response Division Operational Memorandum #8, Revision 4: Generic Resid Initial Cleanup Criteria. June 5, 1995

¹ Site Specific Background

⁴ State Background: MERA Operational Memorandum #15. Default Type A Cleanup Criteria, September 30, 1993.

GSI criterion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995).

¹ Industrial DW Criterion - Environmential Respitinse Division Operational Memorandum #14 Revision 2 June 6, 1995.

.
Tindustiigt Aesthetic drinking water criterion - Environmental Response Division Operational Micmorandum #14 Revision 2, June 6, 1995.

*GSI Chterion: Operational Memoranchini #8, Revision 4 (June 5, 1995).

Exceedances are bolded.

Gevenlativister Contract Criteria was not included in this table because there were no detection limits which exceeded the criteria

Protective of industrial Drinking Water values were included only if they differed from the Protective of Residential Drinking Water Values

A biank cell indicates that compound is not addressed in Operational Memorandums.

Diesel Range Organics and Total Petroleum Hydrocarbons have no established criterion. The results are presented in mg/l.

« indicates that analyte was not detected at detection limit given-

NR Parameter not reported

L. Estimated value

(B) - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value.

B - Analyte present in method blank

ID - Insufficient data for calculation

IP - Development of generic GSI value in process but not yet complete.

^ - Tentatively identified compounds present

⁴ Data not broken down into isomers so the most conservative criteria was used which is cis-

³ Chemical may be present in several isomer forms I Isomer specific concentrations must be combined for comparison to ciriteria

TABLE 5-15 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - PESTICIDES AND PCBs

Notes

Residential DW Criterion - Interim Environmental Response Division Operational Memorandum #8, Revision 4, General Residential Cleanup Criteria, June 5, 1995.

⁷ Residential Aesthetic drinking water criterion - interim Environmental Response Division Operational Memorandum #8. Revision 4. Generic Residential Cleanup Criteria. June 5: 1995.

 ϵ

¹ Site Specific Background

⁴ State Background, MERA Operational Memorandum #15, Default Type A Cleanup Criteria, September 30, 1993.

⁵ GSI cirilerion - Amended version (November 3, 1997) to Operational Memorandum #8, Revision 4 (June 5, 1995)

² Industrial DW Criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

Industrial Aesthetic drinking water criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

120X GSI Critenon - Operational Memorandum #8. Revision 4 (June 5, 1995).

Exceedances are bolded.

Groundwater Contact Criteria was not included in this table because there were no detection limits which exceeded the citteria Protective of industrial Drinking Water values were included only if they airfered from the Protective of Residential Drinking Water Values

A biank cell indicates that compound is not addressed in Operational Memorandums

< - indicates that analyte was not detected at detection limit given

NR - Parameter not reported

J - Estimated value

(B) - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value.

B. Analyte present in method blank

ID Insufficient data for calculation

IP Development of generic GSI value in process but not yet complete

^ Tentatively identified compounds present

[5] - Chemical may be present in several isomer forms . Isomer specific concentrations must be combined for comparison to criteria

(T) - Toxic Substances Control Act, Subpart G-PCB Spill Cleanup Policy standards may be more resinctive

TABLE 5-15 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - PESTICIDES AND PCBs

Notes

Residential DW Chtenpn - Interm Environmental Response Division Dperational Memorandum #8, Revision 4, General Residential Clearup Criteral, June 5, 1995

.
- Residential Aestheric arinking water criterion - Interim Environmental Response Division Coerational Memorandum #8. Revision 4. Genera Residential Cleanup Criteral June 5, 1995.

¹ Site Specific Background

- State Background, ME7A Operational Memorandum #15, Default (vpe A Cleanup Ciriera, September 30, 1993)

⁵ GSI chterion - Americad version (November 3-1997) to Cperational Memorandum #8-Revision 4 (June 5-1995)

² industrial DW Criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

industral Aesthetic drinking water cirterion. Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

120X GSI Cirterion Coerational Memorandum #8 Revision 4 (June 5 1995)

Exceedances are bolded.

Groundwater Contact Criteria was not included in this table because there were no detection limits which exceeded the criteria

Protective of Industrial Drinking Water values were included only if they differed from the Protective of Residential Drinking Water Values

A blank cell indicates that compound is not addressed in Operational Memorandums

- < indicates that analyte was not detected at detection limit given.
- NR Parameter not reported
- J Estimated value

(B) - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value.

B - Analyte present in method blank

- ID Insufficient data for calculation
- IP. Development of generic GSI value in process but not yet complete.
- ¹ Tentatively identified compounds present

(J) - Chemical may be present in several isomer forms. Isomer specific concentrations must be combined for comparison to criteria

(T) - Toxic Substances Control Act, Subpart G-PCB Spill Cleanup Policy standards may be more restrictive

Notes

Residential DW Cifferian - Interim Environmental Response Division Operational Memorandum #8, Revision 4, Generic Residential Cleanup Cirteria, June 5, 1995

2 Residential Aesthetic dinking water cirteron - Intenm Environmental Response Division Operational Memorandum #8, Revision 4 Generic Residential Cleanup Cirteria, June 5, 1995

³ Site Specific Background

⁴ State Background, MERA Operational Memorandum #15 Default Type A Cleanup Criteria. September 30, 1993

³ GSI criterion - Arnended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995)

^a Industrial DW Criterian - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

.
Findustrial Aesthetic drinking water criterion - Environmental Response Divelon Operational Memorandum #14 Revision 2, June 6, 1995. [

#20X GSI Criterion - Operatfonal Memorandum #8, Revision 4 (June 5, 1995)

Exceedances are bolded.

Groundwater Contact Criteria was not included in this table because there were no detection limits which exceeded the criteria

Protective of Industrial Drinking Water values were included only if they differed from the Protective of Residential Drinking Water Values.

A blank cell indicates that compound is not addressed in Operational Memorandums.

< - indicates that analyte was not detected at detection limit given

NR - Parameter not reported

J - Estimated value

{B} - Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

B - Analyte present in method blank.

ID - Insufficient data for calculation

IP - Development of generic GSI value in process but not yet complete.

^ - Tentatively identified compounds present

(J) - Chemical may be present in several isomer forms lisomer specific concentrations must be combined for comparison to criteria

(T) Toxic Substances Control Act, Subpart G-PCB Spill Cleanup Policy standards may be more restrictive,

TABLE 5-16 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - METALS

-i

Notes

Residential DW Chlerein, Intern Environmental Response Disison Operational Memorandum #8, Revision 4, Generic Residential Cleanup Criteria, June 5, 1995.

^г Речи^вельн Ауулевс авлююд мательтенно «Interior Environmental Pesplose Division Operational Memorandum #8 Revision 4. Generic Residential Cleanup Criteria, June 5, 1995.

² Site Specific Background

7. State Brickground, MERA Operational Memorandum #15. Default Type A Cleanup Criteria, September 30, 1993.

.
1995 chtenijn - Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995).

.
Tindustrial DW Criterion - Environmental Response Division Operational Memorandium #14 Revision 2, June 6, 1995

.
Tindustrial Aesthetic "trinking water cirterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995.

120X GSI Criterion. Operational Memorandum #8, Revision 4 (June 5, 1995).

Exceedances are bolded.

Groundwater Contact Criteria was not included in this table because there were no detection limits which exceeded the criteria

Protective of industrial Drinking Water values were included only if they differed from the Protective of Residential Drinking Water Values.

A blank cell indicates that compound is not addressed in Operational Memorandums

- in indicates that analyte was not detected at detection limit aiven-
- NP Parameter not reported
- J. Estimated value.

(B) Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

B Analyte present in method blank

ID - Insufficient data for calculation

IP. Development of generic GSI value in process but not yet complete.

^ - Tentatively identified compounds present

TABLE 5-16 PETOSKEY MANUFACTURING COMPANY SITE GROUNDWATER SAMPLING - OCTOBER 1995 ANALYTICAL DATA - METALS

<u>المستخدمات المستخدم</u>

Contract Contract

Notes.

Residential DW Orteinon - Interim Environmental Response Division Operational Memorandum #8. Revision 4. Genera Residential Cleanup Distance June 5, 1995.

- Residential Aesthetic drinking water criterion - Interim Environmental Response Division Operational Menocondum #8. Revision 4. Generic Residential Cleanup Ortoria, June 5, 1995.

¹ Site Specific Background

* State Background: MERA Operational Memorandum #15. Default Type A Cleanup Criteria. September 30, 1993.

1698 entench - Amended version (November 3, 1997) to Operational Memorandum #8. Revision 4 (June 5, 1995).

1 Inqustrial DW Criterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

Inqustrial Aesthetic drinking water citterion - Environmental Response Division Operational Memorandum #14 Revision 2, June 6, 1995

*20X GSI Criterion - Operational Memorandum #8, Revision 4 (June 5, 1995)

Exceedances are bolded.

Groundwater Contact Criteria was not included in this table because there were no detection limits which exceeded the criteria

Protective of industrial Dinking Water values were included only if they differed from the Protective of Residential Drinking Water Values

A blank cell indicates that compound is not addressed in Operational Memorandums

< indicates that analyte was not detected at detection limit given

NR - Parameter not reported

J. Estimated value

(B) Chemical has either not been evaluated or an inadequate data base precludes the development of a GSI value

5 - Analyte present in method blank

ID - Insufficient data for calculation.

IP Development of generic GSI value in process but not yet complete.

4 - Tentatively identified compounds present

SUMMARY OF SHALLOW SOIL DATA PETOSKEY MANUFACTURING SITE

- 4

 $\ddot{}$

ż. \sim

 $\ddot{}$

SUMMARY OF SHALLOW SOIL DATA PETOSKEY MANUFACTURING SITE

ND = Not Detected

NA = Not Applicable

1 Shallow soil background samples include samples with ED numbers and (depth in feet): Bl (1-3), B2 (1-3), 206 (0.5-2 5), 207 (0.5-

2 Dragun and Chiasson, 1991

* Eastern USA

** Michigan sandy soils

*** Michigan lower peninsula soils

 $\ddot{\cdot}$. .

CONPARISON OF SOILS DATA TO BACKGROUND SOIL DATA PETOSKEY MANUFACTURING SITE

 $ND = Not$ Detected

 \mathbb{R}

<u> 28 % </u> = Chemical of potential concern

 $rc = Reference$ Concentration

1 Shallow soil background samples include samples with ID numbers and (depth in feet): B1 (1-3), B2 (1-3), 206 (0.5-2.5), 207 (0.5-2.5).

2 All soils background samples include samples with ID numbers and (depth in feet): B1 (1-3), B2 (1-3), 206 (0.5-2.5), 207 (0.5-2.5), B1 (7-11), B1 (15-17), B2 (5-7), B2 (11-15), 206 (2.5-4.5), $207(2.5-4.5)$.

SUMMARY OF SUBSURFACE SOIL DATA PETOSKEY MANUFACTURING SITE

 \sim

 \sim \ddotsc ا
شا

 $\frac{3}{2}$

 $\,$ t \overline{a}

 $\frac{1}{2}$

SUMMARY OF SUBSURFACE SOIL DATA PETOSKEY MANUFACTURING SITE

ND = Not Detected

NA = Not Applicable

1 Subsurface soil background samples include samples with ID numbers and (depth in feet): $BI(7-11)$, $BI(15-17)$, $B2(5-7)$, $B2(11-15)$, 206(2.5-4.5), 207(2.5-4.5).

2 Dragun and Chiasson, 1991

* Eastern USA

** Michigan sandy soils

*** Michigan lower peninsula soils

SUMMARY OF ALL SOILS DATA PETOSKEY MANUFACTURING SITE

$TABLE 6-4$

SUMMARY OF ALL SOILS DATA PETOSKEY MANUFACTURLNG SITE

 $ND = Not$ Detected

NA = Not Applicable

 $\overline{1}$ All soils background samples include samples with ID numbers and (depth in feet): B1 (1-3), B2 (1-3), 206 (0.5-2.5), 207 (0.5-2.5), B1 (7-11), Bl (15-17), B2 (5-7), B2 (11-15), 206 (2.5-4.5), 207 (2.5-4.5).

2 Dragun and Chiasson, 1991

' Eastern USA

** Michigan sandy soils

*** Michigan lower peninsula soils

TABLE 6-5

SUMMARY OF GROUNDWATER DATA PETOSKEY MANUFACTURING SITE

ND = Not Detected

ž.

NA = Not Applicable

1 Background samples collected by Malcolm Pimie, Inc. in 1995 include: PS-AS, PS-AD, PS-1R, PS-6, PS-13. note: only PS-AD was analyzed for inorganic chemicals.

re = Reference Concentration

سادتين

Ċ,

TABLE 6-6

**CHEMICALS OF POTENTIAL CONCERN
PETOSKEY MANUFACTURING SITE**

 ${\rm ND}$: ${\rm Not}$ Detected

 \mathbb{R}^3

 \cdot ,

 $\overline{}$

• : Detected but not chosen as a chemical of potential concern

 $X:$ Selected as a chemical of potential concern

NA: Not Applicable

 \sim \sim

 ~ 10

 \sim .

 \ddotsc

 $\bar{\mathcal{A}}$

د
الأول \sim

 \mathcal{L}

 \sim \sim

 \sim $\ddot{}$ $\bar{\beta}$ \mathbb{R}^3

> σ : \mathbb{R}^2

 \sim μ

 \sim

 \sim

 \bullet .

 $\mathcal{L}(\mathcal{L}^{\mathcal{L}})$ and the set of $\mathcal{L}^{\mathcal{L}}$ and the set of $\mathcal{L}^{\mathcal{L}}$ and the set of $\mathcal{L}^{\mathcal{L}}$

 \sim μ

$\label{eq:2.1} \mathcal{L}_{\mathcal{A}}(x,y) = \mathcal{L}_{\$ α

* Assumes all sediment or soil is contaminated.

[1JUSEPA, 1991 [2] Professional judgement [3JUSEPA, 1989a [4]MDEQ, 1995b [5JMDEQ, 1995a [6JUSEPA, 1989b [7]USEPA, 1992a

 \sim \sim

 $\mathcal{L}^{\text{max}}_{\text{max}}$, $\mathcal{L}^{\text{max}}_{\text{max}}$

 $\mathbf{1}^{\top}$

 $\frac{1}{2}$

 $\mathcal{L}^{\mathcal{L}}$. The set of the set of the set of $\mathcal{L}^{\mathcal{L}}$

the contract of the contract of the state of the contract of the contract of the contract of the contract of

 $\frac{1}{4}$.

 \mathcal{L}

 \sim

 $\frac{1}{4}$

 $\label{eq:2.1} \mathcal{L} = \mathcal{L} \left(\mathcal{L} \right) \left(\mathcal{L} \right)$

Acetone

Toluene

Di-n-butyl-phthalate

Fluoranthene

Fluorene

4.001502

4.00E-02

 $21:405$

5E-06

Not Applicable

Not Applicable

 $71: -07$

 $2E-07$

1.00E-02

 1001.02

1.001.-02

UCL

UCI.

1.40E+00

 $422E-01$

 $\mathcal{L}^{\mathcal{L}}$ and the set of the

and the control of the state of

SUMMARY OF NONCARCINOGENIC AND CARCINOGENIC HEALTH RISKS FOR AN ADULT RESIDENT (LIMITED RESIDENTIAL USE) PETOSKEY MANUFACTURING SITE

SUMMARY OF NONCARCINOGENIC AND CARCINOGENIC HEALTH RISKS FOR AN ADULT RESIDENT (LIMITED RESIDENTIAL USE) PETOSKEY MANUFACTURING SITE

SUMMARY OF NONCARCINOGENIC AND CARCINOGENIC HEALTH RISKS FOR AN ADULT RESIDENT (LIMITED RESIDENTIAL USE) PETOSKEY MANUFACTURING SITE

 $\mathcal{L}^{\text{max}}_{\text{max}}$

Tab6el 1.xlx xx ad de

 $\sim 10^{-1}$

 $\mathcal{L}^{\mathcal{L}}$

 $\mathcal{L}^{\mathcal{L}}$

 $\sim 10^7$

 \sim

 $\sim 10^7$

 $\mathcal{L}^{\mathcal{L}}$, and the set of $\mathcal{L}^{\mathcal{L}}$, and the set of the finite field $L^{\mathcal{L}}$, then the set of $L^{\mathcal{L}}$, $L^{\mathcal{L}}$

 $\sim 10^{11}$ km s $^{-1}$

 $\sim 10^{11}$ km $^{-1}$

 $\mathcal{A}^{\mathcal{A}}$, where $\mathcal{A}^{\mathcal{A}}$ is the definition of the following the contribution of the co

t a than the find

 \mathbf{L} and \mathbf{L}

 $\frac{1}{4}$, $\frac{1}{2}$, $\frac{1}{2}$

 $\mathcal{L}^{(1)}$

Tab6-14 xls ss ch ing

 \mathbf{I}

 $\frac{1}{3}$

 α

 $\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L}}(\mathcal{L}^{\mathcal{L$

 \mathbf{I}

 $\mathcal{A}^{\mathcal{A}}$, and the set of the set of \mathcal{A} , $\mathcal{A}^{\mathcal{A}}$, \mathcal

SUMMARY OF NONCARCINOGENIC AND CARCINOGENIC HEALTH RISKS FOR A CONSTRUCTION WORKER PETOSKEY MANUFACTURING SITE

SUMMARY OF HAZARD INDICES AND CANCER RISKS PETOSKEY MANUFACTURING SITE

 \ddotsc

Шù.

 $\ddot{}$ $\frac{3}{4}$

SUMMARY OF HAZARD INDICES AND CANCER RISKS PETOSKEY MANUFACTURING SITE

* Based on 30 year exposure, 6 years child exposure plus 24 years adult exposure.

FIGURES

COPYRIGHT @1997

のまいのをきる

RITERIA

WACHTEL STREET

PETOSKEY, MICHIGAN

JATA - ORGANIC AND INORGANIC COMPOUNDS EXCEEDING INDUSTRIAL CLE

 $\label{eq:1} \ldots \; \underline{\quad} \; \ldots$

LAKE STREET

 $\overline{}$

 $\mathcal{L}(\mathcal{A})$ and $\mathcal{L}(\mathcal{A})$ and $\mathcal{L}(\mathcal{A})$

LEGEND

- SOIL BORING MALCOLM PIRNIE (1995)
- 2 SOIL BORING EDER ASSOCIATES (1992)

NOTES

 \cdot

1 UNITS FOR VOCS. SVOCS. AND PESTICIDES ARE
IN ug/kg UNITS FOR INORGANIC COMPOUNDS ARE

N.

 \otimes B-2.

PETOSKEY MANUFACTURING SITE PETOSKEY, MICHIGAN

ORGANIC AND INORGANIC COMPOUNDS EXCEEDING RESIDENTIAL CLEANL

 $\bar{\rm u}$

LAKE STREET

 $\mathcal{L}^{\text{max}}_{\text{max}}$ and $\mathcal{L}^{\text{max}}_{\text{max}}$

WACHTEL STREET

 $\mathcal{O}(n)$. The components

$\label{eq:2.1} \mathcal{L}(\mathcal{L}^{\text{max}}_{\mathcal{L}}(\mathcal{L}^{\text{max}}_{\mathcal{L}})) \leq \mathcal{L}(\mathcal{L}^{\text{max}}_{\mathcal{L}}(\mathcal{L}^{\text{max}}_{\mathcal{L}}))$

\otimes B-2

LEGEND

- SOIL BORING MALCOLM PIRNIE (1995)
- 2 SOIL BORING EDER ASSOCIATES (1992)

NOTES

1. UNIT'S FOR VOCS, SVOCS, AND PESTICIDES ARE
IN UYAG, UNITS FOR INORGANIC COMPOUNDS ARE

 \mathcal{N}

늭

 $\hat{\mathcal{A}}$

PETOSKEY MANUFACTURING SITE PETOSKEY, MICHIGAN **MONITORING WELL LOCATIONS**

l,

 cos in sec

 $\overline{}$

 \sim \sim

GROUNDWATER ANALYTICAL DATA - COMPOUNDS EXCEEDING CLEANUP CF PETOSKEY, MICHIGAN

PETOSKEY MANUFACTURING SITE

Ù,

 $\hat{\mathbf{x}}$

WACHTEL STREET

 $\hat{\mathcal{A}}$

 $\bar{1}$ $\frac{1}{3}$

Service Service

 \cdots

 $\mathcal{L}(\mathcal{L}^{\mathcal{L}})$. The contract constraint $\mathcal{L}^{\mathcal{L}}(\mathcal{H})$

 \sim

⊘B-2

 ~ 10 والمتحد للمحتمل

 \bigcirc SB-206

 $\omega_{\alpha\beta}(\tau) = \omega_{\alpha\beta}(\tau) \omega_{\alpha\beta}(\tau) + \omega_{\alpha\beta}(\tau) \omega_{\alpha\beta}(\tau)$

 \mathcal{L}_{int} , where \mathcal{L}_{int} and

PETOSKEY MANUFACTURING SITE PETOSKEY, MICHIGAN **SOIL SAMPLING LOCATIONS**

 \bar{z}

 $\omega_{\rm{max}}$ and $\omega_{\rm{max}}$

 $\sim 10^{11}$ km s $^{-1}$ km

 $\bar{\mathcal{A}}$

 \mathcal{L}^{c} , \mathcal{L}^{c} , \mathcal{H}^{c} , \mathcal{H}^{c}

LAKE STREET

 \sim \sim \sim

SB-207 ₩

 τ , τ

 \sim

\otimes 8-2

 $\gamma_{\rm gas}$ $\sim 10^{11}$ eV $^{-1}$

\bigcirc SB-206

 \sim \sim

 \sim \sim

 \sim

 $\ddot{\cdot}$ $\frac{1}{2}$ ÷,

APPENDICES

 ϵ

APPENDIX A

BORING LOGS

 $\frac{1}{\sqrt{2}}$

 $\overline{\mathbf{L}}$

 $\begin{array}{c}\n\bullet \\
\bullet \\
\bullet\n\end{array}$

 $\frac{1}{2}$

 $\frac{1}{2}$

na
∫

 $\ddot{}$

APPENDIX B WELL CONSTRUCTION LOGS

 $\frac{1}{2}$

 $\frac{1}{\sqrt{2}}$

 $\frac{1}{2}$ $\overline{}$

 \sim ω

 $\ddot{}$

 \sim

 \sim \sim

 \sim \sim

 \sim

 \sim .

 $\begin{bmatrix} 1 \\ 1 \\ 1 \end{bmatrix}$

 \overline{a}

÷,

 \sim \sim

 φ_{σ}

-

 $\omega_{\rm{ex}}$

 $\ddot{}$ \ddotsc \mathcal{A} \sim $\omega_{\rm eff}$

цц. \sim

 \mathbb{Z}^2

 \mathbb{R}^2 \mathbb{Z}^2 $\hat{\beta}$. $\frac{1}{\sigma_{\rm c}}$

 $\hat{\gamma}_0$

 $\ddot{}$.

 $\bar{\omega}$

 $\ddot{}$

 ω

 \sim

 \sim \sim

 $\ddot{}$

 $\bar{\psi}$.

ίú,

۰, $\hat{\vec{J}}$

 $\bar{z}=1$

u,

--

 \sim $\hat{\phi}$

 \bar{z} $\hat{\mathcal{L}}$

 \sim

 $\hat{\mathcal{L}}$, $\hat{\mathcal{A}}$

> \mathbb{R}^2 $\hat{\mathcal{L}}$

 $\frac{1}{2}$

 $\frac{1}{2}$

 $\ddot{}$

WELL CONSTRUCTION LOG

 \mathbb{R}^2

 $\frac{1}{2\pi\epsilon_0}\frac{d\omega}{d\omega_0}$

Ц. $\frac{1}{2}$

 $\overline{}$ \mathbb{Z}^2

 $\bar{\psi}$

 $\mathbb{R}_{>0}$ $\overline{}$

 $\frac{1}{2}$

J.

 \bar{z}

 $\bar{\omega}$

 $\ddot{}$

 $\ddot{\cdot}$

 \mathbb{R}^2

 \mathbb{R}^2

 \mathcal{A}

 $\bar{\phi}$ \sim

 \mathbb{I}

 $\bar{\mathbb{Z}}$.,

 \sim ...

 $\hat{\mathcal{P}}$

 $\mathbb{Z}^{\mathbb{Z}}$ $\hat{\boldsymbol{\beta}}$

 $\hat{\omega}$.

 $\bar{\psi}$

 $\frac{1}{2}$

APPENDIX C SLUG TEST ANALYSIS DATA

 $\overline{1}$

 \ddotsc

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

--

MW-201a TEST No. 1

 \sim \sim

 $\overline{}$

 $\overline{}$

 \bar{z} is \bar{z}

 \sim .

 \mathbb{R}^2

 $\ddot{}$

Lû. ÷

 $\frac{1}{2}$

 $\frac{1}{\sqrt{2}}$

 $\bar{\tau}$, $\bar{\tau}$

 \sim

MW-201a TEST No. 1

 $\ddot{}$ $\frac{1}{2}$

 $\ddot{}$ $\frac{1}{2}$.

 \ddotsc

 $\overrightarrow{}$ l.

 $\bar{\phi}$

ш.

 $\overline{}$

 $\ddot{}$

 \bar{z}

 \sim \sim

MW-201

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

 $\label{eq:2.1} \mathcal{L}(\mathcal{L}^{\text{max}}_{\mathcal{L}}(\mathcal{L}^{\text{max}}_{\mathcal{L}})) \leq \mathcal{L}(\mathcal{L}^{\text{max}}_{\mathcal{L}}(\mathcal{L}^{\text{max}}_{\mathcal{L}}))$

L.

 $\overline{}$

L.

÷,

 \sim

 $\epsilon_{\rm c}$

 $\ddot{}$

 \ddotsc

 $\hat{\boldsymbol{\gamma}}$

 $\label{eq:2.1} \frac{1}{\sqrt{2}}\int_{\mathbb{R}^3}\frac{1}{\sqrt{2}}\left(\frac{1}{\sqrt{2}}\right)^2\frac{1}{\sqrt{2}}\left(\frac{1}{\sqrt{2}}\right)^2\frac{1}{\sqrt{2}}\left(\frac{1}{\sqrt{2}}\right)^2\frac{1}{\sqrt{2}}\left(\frac{1}{\sqrt{2}}\right)^2\frac{1}{\sqrt{2}}\left(\frac{1}{\sqrt{2}}\right)^2\frac{1}{\sqrt{2}}\frac{1}{\sqrt{2}}\frac{1}{\sqrt{2}}\frac{1}{\sqrt{2}}\frac{1}{\sqrt{2}}\frac{1}{\sqrt{2}}$

 $\mathcal{L}^{\text{max}}_{\text{max}}$ and $\mathcal{L}^{\text{max}}_{\text{max}}$

 \sim \sim

 \sim \sim

 $\omega = \frac{1}{2} \left(\frac{1}{2} \right) \left(\frac{1}{2} \right) \left(\frac{1}{2} \right) \left(\frac{1}{2} \right) \left(\frac{1}{2} \right)$

SLUG TEST DATA REDUCTION BOUWER 4 RICE METHOD

 \cdot 4

MW-105S TEST No. 1

ت.
المدين ЦÝ.

сЦ.

MW-105S TEST No. 1

 \overline{z}

 $\frac{1}{\sqrt{2}}$

 $\overline{}$ j. \sim ζ .

> $\bar{\psi}_\tau$ \mathbb{Z}

 \dotsc

 $\frac{1}{2}$

 $\frac{1}{2}$ \sim

 \bar{z}

 \sim

 \mathcal{A}

MW-105S

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

 \mathcal{A}

 \sim

. .. \mathcal{I}

MW-105S TEST No. 2

 ~ 10

 \sim

 \sim

l. \mathbb{R}^2

 \ddotsc

 \ddotsc

 \sim

MW-105S TEST No. 2

 \blacksquare

 $\ddot{}$

... ∽ \sim $\hat{\phi}$, \sim 1 $\ddot{}$ $\frac{1}{2}$ Ľ, $\ddot{}$ $\ddot{ }$ $\epsilon_{\rm d}$ \ddotsc

 $\bar{\mathcal{L}}$.

 $\overline{}$

MW-105S

رميه

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

 \mathbf{r}

MW-105D TEST No. 1

 $\sim 10^7$

a.

 \overline{a}

J.

MW-105D TEST No. 1

 \sim \sim

 $\overline{}$ \sim \mathcal{A} \mathbb{R}^4 $\langle \ldots \rangle$ \mathbb{Z} $\langle \cdot \rangle_{\rm L}$

 \sim \sim
MW-105D

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

J.

MW-105D TEST No. 2

 $\hat{\mathbf{r}}$

الباد α $\sim 10^{-1}$ \mathcal{L}_{max}

 $\frac{1}{2}$

L.

 \mathbb{Z}^2

 ω

 $\bar{\zeta}$.

Щ,

 \mathcal{A}^{\pm}

 $\mathcal{A}^{\mathcal{A}}$

J.

 \sim

MW-105D TEST No. 2

 \blacksquare

 λ

 $\ddot{}$ t. $\hat{\mathcal{A}}$... $\begin{array}{c}\n\bullet \\
\bullet \\
\bullet \\
\bullet\n\end{array}$ $\frac{1}{x}$ وندر المعر ϵ κ \sim $\bar{\mathbf{r}}$ $\hat{\mathcal{A}}$ \mathbb{R}^3 \bar{z}_t $\overline{\mathcal{C}}$

 $\overline{}$

 ω . $\bar{\omega}$

 $\mathbb{R}^{\mathbb{Z}}$

 \bar{z}

 $\bar{\omega}$

 \ddotsc

MW-105D

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

MW-CS TEST No. 1

 $\hspace{0.1mm}$

 $\sim 10^7$

 \mathbb{R}^2

 $\overline{}$

الأرابية

 $\omega_{\rm{eff}}$

 $\bar{\mathcal{L}}$ $\sim 10^{-10}$

 $\langle \hat{A} \rangle$

 $\omega_{\rm{obs}}$ \hat{A} $\frac{1}{2}$

 $\frac{1}{2}$ $\sqrt{3}$.

 \sum

 $\hat{\mathbf{r}}$

 $\sim 10^{-1}$

 $\Delta \Delta \phi$

 $\mathcal{L}^{\text{max}}_{\text{max}}$, where $\mathcal{L}^{\text{max}}_{\text{max}}$

 $\mathcal{L}^{\text{max}}_{\text{max}}$, where $\mathcal{L}^{\text{max}}_{\text{max}}$

MW-CS TEST No. 1

 \mathbb{R}^2

 $\mathbb{L}^{\mathbb{Z}}$. $\frac{1}{\sqrt{2}}$

 \sim

 $\alpha_{\rm 2}$

 $\bar{\omega}$

 $\tilde{\mathcal{J}}_k$ J. $\bar{\psi}$. \mathbb{R}

 \bar{z}

PS-CS

ل منذ

 $\ddot{\cdot}$

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

 \sim

 \sim

 $\overline{}$

 $\overline{}$

 \mathcal{L}_{max} , \mathcal{L}_{max} ,

 $\ddot{}$

اب منه

 $\frac{1}{2} \sum_{i=1}^{n} \frac{1}{2} \sum_{j=1}^{n} \frac{1}{2} \sum_{j=1}^{n$

MW-CS TEST No. 2

 $\overline{}$.

 $\hat{\mathcal{L}}_{\text{max}}$

 $\bar{\mathcal{D}}$

 \hat{z} , \hat{z}

 $\Delta \phi$

 $\ddot{}$

 \mathbb{Z}^{ℓ}

 $\frac{1}{2}$ \mathbb{Z} \bar{z}

 $\omega_{\rm{eff}}$

 $\hat{\mathcal{L}}$, $\hat{\mathcal{L}}$

 ~ 10

MW-CS TEST No. 2

 \sim

. . .

 \overline{a}

 $\mathcal{F}(\mathcal{F})$

 \sim

 $\ddot{}$

8

 $\mathcal{L}^{\text{max}}_{\text{max}}$ and

 ~ 10

PS-CS

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

MW-cd TEST No. 1

-

 ~ 10

 $\bar{\mathcal{A}}$. $\overline{}$

 $\frac{1}{\sqrt{2}}$ $\mathcal{F}_{\mathcal{F}_{\text{out}}}$

 \sim \sim

 \mathbb{R}

 \sim \sim

 \mathcal{L} \overline{a}

أنسد

 $\zeta_{\rm{max}}$

 \sim \sim

J.

 \sim \sim

MW-cd TEST No. 1

 $\ddot{}$

 $\ddot{}$

 \bar{z}

L. $\hat{\mathcal{L}}$, \ddotsc $\hat{\mathcal{A}}$ $\label{eq:3.1} \mathbb{E} \left[\mathbb{$ $\frac{1}{2}$ \ddotsc \sim $\,$ $\mathcal{L}_{\mathcal{R}}$

 $\overline{}$

 \mathbf{r}

PS-CD

 \ddotsc

 \rightarrow

 \sim

◢

MALCOLM
PIRNIE

 $\sigma_{\rm{eff}}=0.000$

 \overline{a}

 $\Delta \Delta t$

 \mathbf{A}

MALCOLM
PIRNIE

 $\bar{\mathcal{A}}$

 \overline{a}

 \bullet

 \mathfrak{I}_i

والمساعات

 $3/11$

 \sim

 \longrightarrow

 $\frac{1}{2} \left(\frac{1}{2} \right) \frac{1}{2} \left(\frac{1}{2} \right)$

 \ddotsc

 $\ddot{}$

 \bar{V}

C:\FORMS\PUMPTEST.FRM

 $\omega_{\rm{eff}}$

MALCOLM
PIRNIE

 \ddotsc

 \sim

 \overline{a}

 $\frac{1}{2} \sum_{i=1}^{n} \sum_{j=1}^{n} \left(\sum_{j=1}^{n} \frac{1}{j} \right)^{i} \left(\sum_{j=1}^{$

 \mathbf{A}

 \bar{z}

 $\ddot{}$

MALCOLM
PIRNIE

PUMP TEST DATA ...

÷.

 \mathcal{L}

 $\hat{\mathcal{A}}$

 $5/11$

MALCOLM
PIRNIE

 \mathbb{Z}^2

 $\cdots \cdots$

 α

MALCOLM
PIRNIE

 $\ddot{}$

 $\ddot{}$

 \mathbb{Z} .

. L

 \overline{a}

 Λ

 $\mathcal{L}^{\text{max}}_{\text{max}}$

MALCOLM
PIRNIE

 $\frac{1}{2}$

 \mathbb{R}^2

 $\frac{1}{2}$

 $\sqrt{2}$

 $2/11$

 $\frac{1}{2} \left(\frac{1}{2} \right) \left(\frac$

i.

 $\ddot{}$

 $\bar{\phi}$

 \bar{z}

MALCOLM
PIRNIE

 $\frac{1}{2}$

 \bar{z}

 \bar{z}

 $\mathcal{L}^{\mathcal{L}}$

 $\bar{1}$

 α

 $-\hbox{--}$

 \ddotsc

J.

 $\ddot{\mathbb{I}}$

 ~ 100 km s $^{-1}$

 $\Delta \phi$ ~ 10 ... \sim α $\bar{\phi}$ \sim \sim α). $\hat{\phi}$ $\mathcal{A}_{\mathcal{S}}$ $\hat{\mathbf{v}}$ $\hat{\mathcal{C}}$ $\omega_{\rm c}(\mathbf{r})$ $\hat{\mathcal{A}}$

 $\overline{}$
APPENDIX E

 \mathcal{A}

 \equiv \equiv

PUMPING TEST MONITORING DATA

o i

 \ddotsc

 $\bar{\nu}$. Á,

 $\bar{\lambda}$. $\hat{\rho}$. $\epsilon_{\rm eff}$

 $\omega_{\rm{eff}}$ $\epsilon_{\rm{max}}$

 \hat{f}).

i,

 \sim α

SVE PILOT STUDY DATA

Project # 2420-017-H30

Page 1 of 1

COMMENTS:

.....

 \overline{a}

 $\bar{\mathcal{L}}_{\text{max}}$

l,

Plug inserted into SVE-203S well to seperate groundwater screen from the SVE screened interval

START 11:30 am 9-12-95 FINISH 8:00 am 9-14-95

Air Samples collected

PT-SVE203S-1 12:15 pm PT-SVE203S-7 3.15 pm PT-SVE203S-2 1:15 pm PT-SVE203S-8 11:15 pm PT-SVE203S-3 2:15 pm PT-SVE203S-9 7:15 am PT-SVE203S-4 3:15 pm PT-SVE203S-5 11:15 pm PT-SVE203S-6 7:15 am

 $\boldsymbol{\gamma}$

éria. ω.

 \sim $-$

 $\epsilon_{\rm{max}}$ $\epsilon_{\rm c}$:

 $\hat{\phi}$ \sim \mathbf{r}^{\dagger} .

 \mathbb{C}^{\times} $\hat{\mathbf{v}}(\mathbf{r})$. k.

s in \mathbf{z} .

k, k ϵ .

 $\bar{\omega}$.

SVE PILOT STUDY DATA

Project # 2420-017-H30 Page 1 of 1

FINISH

 $9:15$ am $9-15-95$

COMMENTS:

 \sim

j.

 \sim

Air Samples collected

PT-SVE201S-1 9:45 am PT-SVE201S-2 10:45 am PT-SVE201S-3 11:45 am PT-SVE201S-4 12:45 pm PT-SVE201S-5 8:45 pm PT-SVE201S-6 8:45 am

 \sim $\label{eq:2.1} \frac{1}{\sqrt{2}}\left(\frac{1}{\sqrt{2}}\right)^{2} \left(\frac{1}{\sqrt{2}}\right)^{2} \left(\$

 $\label{eq:2} \frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1$

 $\label{eq:2.1} \frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac{1}{\sqrt{2}}\sum_{i=1}^n\frac$

APPENDIX D

 $-\!-\! \cdots$

e pr

 $\frac{1}{2}$ ساد

 \mathcal{L}

SOIL VAPOR EXTRACTION TEST MONITORING DATA

 $\mathcal{L}(\mathcal{L}^{\text{max}}_{\text{max}})$

PS-CD

MW-CD TEST No. 2

 $\ddot{}$

نه.

 $\bar{\omega}$.

 $\mathcal{L}_{\mathcal{A}}$, and the set of the set of $\mathcal{L}_{\mathcal{A}}$ \sim \sim $\mathcal{L}_{\rm{max}}$ and $\mathcal{L}_{\rm{max}}$ $\frac{1}{2} \left(\frac{1}{2} \right)$, $\frac{1}{2} \left(\frac{1}{2} \right)$, $\frac{1}{2} \left(\frac{1}{2} \right)$ $\label{eq:2.1} \mathcal{L}(\mathcal{L}^{\text{max}}_{\mathcal{L}}(\mathcal{L}^{\text{max}}_{\mathcal{L}})) \leq \mathcal{L}(\mathcal{L}^{\text{max}}_{\mathcal{L}}(\mathcal{L}^{\text{max}}_{\mathcal{L}}))$ $\label{eq:2.1} \frac{1}{\sqrt{2}}\int_{\mathbb{R}^3} \frac{1}{\sqrt{2}}\left(\frac{1}{\sqrt{2}}\right)^2\left(\frac{1}{\sqrt{2}}\right)^2\left(\frac{1}{\sqrt{2}}\right)^2\left(\frac{1}{\sqrt{2}}\right)^2.$

MW-CD TEST No. 2

<u>and a strong part of the strong par</u>

 \overline{a}

 \mathbb{R}^2

 $\ddot{}$

 $\label{eq:2.1} \mathcal{L}_{\mathcal{A}}(\mathcal{A})=\mathcal{L}_{\mathcal{A}}(\mathcal{A})\otimes\mathcal{L}_{\mathcal{A}}(\mathcal{A})\otimes\mathcal{L}_{\mathcal{A}}(\mathcal{A})\otimes\mathcal{L}_{\mathcal{A}}(\mathcal{A}).$

 $\sigma_{\rm{max}}$ and $\sigma_{\rm{max}}$

SLUG TEST DATA REDUCTION BOUWER & RICE METHOD

 $\mathbf c$

÷.

 \bar{V}

PUMP TEST DATA ...

 χ^2

 \ddotsc

 α

 \mathcal{A}^{out}

PUMP TEST DATA

 \mathcal{A}

 $\Delta \phi$

MALCOLM PIRNIE

 \sim

 682

PUMP TEST DATA

 $\bar{\mathbf{t}}$

 \sim

 $\frac{1}{2}$

e. 1

ò.

¥

¢.

 ~ 10 p.

 $\overline{}$

 $\frac{1}{2}$

ない。

Rest z, $\hat{\mathcal{A}}$ i
Sak $\frac{1}{2}$ $\frac{1}{2} \omega_{\rm eff}$ $\ddot{}$ p. 1

 $\frac{1}{2}$

المهر

 $\mathcal{L}^{\text{max}}_{\text{max}}$

 $\pmb{\downarrow}$:

ń $\frac{1}{2}$ $\frac{1}{\sqrt{2}}$ \mathcal{P}^{\star} $\hat{\mathbf{e}}^{(i)}$ era
Tela $\frac{1}{2}$ $\hat{\phi}$ \tilde{z}

 \sim ŖŖ $\frac{1}{\sqrt{2}}$ $\hat{\boldsymbol{\beta}}$ s = 4 $\bar{\omega}$ is \mathcal{A} $\phi_{\rm A}$ $\ddot{\phi}$ $\mathcal{O}_{\mathcal{A}}$ e. ζ^{μ}) ., $\begin{array}{c} \mathbb{Z}^3 \\ \mathbb{Z}^3 \end{array}$

 \bar{z}

أرب

 $\ddot{}$

 \mathbf{v}

 $\ddot{}$

 $\ddot{}$

 \mathcal{A} \bullet i
No L, Ý. أدبه $\tilde{\mathbf{y}}^{(i)}$ $\hat{\mathbf{y}}$, $\tilde{\mathbf{v}} = \tilde{\mathbf{v}}$ s., ۰.,

u.

Ren er e $\bar{\omega}$ \ddotsc $\hat{\mathbf{z}}$ $\frac{1}{2}$ $\frac{1}{2}$ - $\frac{1}{2}$ $\hat{\mathbf{r}}$ $\hat{\mathcal{A}}_{\text{max}}$ $\ddot{\psi}$ \mathbb{R}^d $\frac{1}{\mathbf{w}}$

 \mathbb{C}^2

 $\ddot{}$

 \sim \sim

APPENDIX F

RISK ASSESSMENT DOCUMENTATION

 $\sim 10^{-1}$

 $\ddot{}$

 $\ddot{\cdot}$ i
Kri

ä,

p.,

 \mathbf{v}

 $\ddot{}$

 $\ddot{}$

 $\ddot{}$

APPENDIX F

- Essential Nutrient Screen \bullet
- Indoor Shower Model \bullet
- Enclosed Space Model
- Respirable Particulates Model \bullet
- Oral Absorption Efficiencies \bullet
- Permeability Coefficients for Dermal Absorption \bullet
- Toxicity Values: Potential Noncarcinogenic Effects
- Toxicity Values: Potential Carcinogenic Effects

ESSENTIAL NUTRIENT SCREEN

Reference concentrations to evaluate the concentrations of essential nutrients (i.e., calcium, iron, magnesium, potassium, and sodium) in soil and groundwater were derived from Recommended Daily Allowances (RDAs) and exposure parameters in the models used by the USEPA, Region III in their derivation of risk-based concentrations (USEPA, 1995b). Based on the exposure scenarios considered in the human health risk evaluation, reference concentrations for soil were derived for ingestion by an adult in an industrial setting and reference concentrations for groundwater were derived for residential tap water use by a child; RDAs for an adult male and male child were used (ESHA Research, 1990).

Reference Concentrations for Soil

$$
RC_s = RDA_a / IR_s * FI * CF
$$

where

Reference Concentration for Groundwater

$$
RC_w = RDA_c / IR_w
$$

where

 RC_w = reference concentration for water (mg/L)

 RDA_c = recommended daily allowance for a child (mg/day)

 IR_w = water ingestion rate (2 L/day)

INDOOR SHOWER MODEL

The concentrations of volatile chemicals in air inside a shower during showering are estimated using an approach recommended by the Gas Research Institute (GRI, 1988) based on the work of Andelman (1985a, 1985b, 1984). The concentrations in the air inside the shower are determined by a balance between the rate of release from the shower water and the rate of air exchange between the shower and the bathroom and the rest of the house. The constants in the model have been set to match the observed efficiency of volatilization of trichloroethene in model showers and to fit the observed shower air concentrations of trichloroethene in several homes with contaminated water where measurements have been made. Scaling to other chemicals is accomplished by assuming that the rate of volatilization between shower water and air is proportional to the Henry's Law constant. The explicit time dependence for the concentration in the shower air is important because the time over which chemicals build up is typically comparable to what might be expected for the shower duration.

The average concentration of a volatile chemical in the shower air over a period of t, minutes (for $t_s > 0$) is estimated from the following equation:

$$
C_s = C_{\inf} [1 + (1 / (kt_s)) (e^{(-kts)} - 1)]
$$

where:

- the average concentration of a volatile chemical in the shower air over a $C_{\rm s}$ duration of t, minutes (mg/m³)
- C_{inf} the asymptotic concentration of a volatile chemical in the shower air if the shower ran for a long time ($>$ 5 minutes) (mg/m³)
- the rate constant for the exponential function (1/minute) k
- the time in the shower (minutes) $t_{\rm s}$

and where:

$$
C_{\text{inf}} = [(E) (F_w) (C_t / 1000)] / F_a
$$

where:

- E the efficiency of release of compounds from water to air (unitless)
- F_w the flow rate of water in the shower (L/minute)
- C, the concentration of the volatile chemical in shower water (ug/L)
- F_a the flow rate of air in the shower (m³/minute)

 $k = F_a / V_b$

where:

- F_a the flow rate of air in the shower (m³/minute)
- V_b the volume of the bathroom (m^3)

$$
E = (E_{\text{TCE}}) (H) / (H_{\text{TCE}})
$$

where:

- E_{TCE} the efficiency of release of trichloroethene from water to air (unitless)
- H Henry's Law constant for the volatile chemical (m3-atm/mol)
- H_{TCE} Henry's Law constant for trichloroethene (m3-atm/mol)

The scenario-specific input variables, calculated values, calculated constants, and estimated chemical concentrations in the shower air are provided in Table F-l for each volatile chemical of potential concern in groundwater.

ENCLOSED SPACE MODEL

Two scenarios involving volatile organic compound (VOC) release into enclosed spaces are evaluated: release into a residential structure constructed with a subterranean basement and release into a residential structure constructed slab-on-grade.

Evaluating the potential for VOC release into enclosed spaces involves estimating the rate (termed "flux") at which subsurface chemicals are transported into the region near the building, the infiltration of the chemicals into the building, and the concentration of the chemicals in indoor air. In the scenarios evaluated here, contaminant flux involves release from both groundwater and subsurface soil. Use of the simple screening-level models described below as a first approximation is consistent with the guidance provided by the USEPA in their Air/Superfund National Technical Guidance Study Series (USEPA, 1992a).

The residential structures are assumed to be bi-level single family homes, 25 ft by 50 ft (7.6 m by 15.2m) typical of the type and size of home currently constructed in the U.S. For the residential structure/basement scenario, the surface area for VOC intrusion (2450 ft² or 227.6 $(m²)$ is the foundation (1250 ft²) and the four basement walls (1200 ft², assuming an 8-foot high basement). Taking all three floors into account, the volume of the home is assumed to be 30,000 ft³ (849.6 m³). For the residential structure/slab-on-grade scenario, the surface area for VOC intrusion (1250 ft² or 116.1 m²) is just the foundation. Taking the two floors into account, the volume of the home is assumed to be 20,000 ft³ (or 566.4 m³). While the City of Petoskey intends to re-zone the site as "multi-family residential", these scenarios should adequately characterize conditions on the lower floors of multi-family dwellings if such construction was to occur.

The Farmer Model most likely overpredicts the contaminant flux since the it ignores all possible attenuating factors. However, it provides a simple screening method to estimate the likely maximum rate at which chemicals would be transported to a building (USEPA, 1992a).

The vapor concentration of the chemical in the pore vapor is estimated assuming the chemical equilibrium follows Henry's Law and is unaffected by other components of the system. Once in the vapor phase, the chemical diffuses through the soil at a rate dependent on the soil porosity, pore space geometry, the air diffusion coefficient of the chemical, and the concentration gradient between the source and the point of exit from the soil.

VOC Flux from Groundwater - VOC release is assumed to originate from dissolved VOCs in groundwater located some distance below ground surface. The modeling equation for VOC flux from groundwater (USEPA, 1992a) is:

$$
J = \frac{D_a C_i H P_a^{10/3}}{R T L P_t^2}
$$

Where:

 $J =$ contaminant flux from water (g/cm^2-s)

 D_a = vapor phase diffusion coefficient in air (cm²-s)

 C_1 = contaminant concentration in water (g/cm³; from mg/1 * 10⁻³ g/mg * 10⁻³ l/cm³)

 $H =$ Henry's Law Constant (atm - m³/mole)

 P_a = air filled soil porosity (unitless)

$$
\mathbf{P}_a = \mathbf{P}_t - \mathbf{O}_m \mathbf{B}
$$

Where:

$$
O_m = \text{soil moisture content (m1/g or cm3 - water/g-soil)}
$$

B = bulk soil density (g/cm³)

 $R =$ universal gas constant (atm - $m³/mole - ^oK$)

 $T =$ soil temperature ((X))

 $L =$ distance from source to point of exit (depth of groundwater) (cm)

 P_1 = total soil porosity (unitless)

A total soil porosity (P_t) of 0.55 for dry non-compacted soils, a soil moisture content (Q_m) of 0.1, and a bulk soil density (B) of 1.7 g/cm³, and a soil temperature (T) of 293° K are assumed. Based on hydrogeological data collected at the site, the depth to groundwater (L) of 13 ft is used. The vapor phase diffusion coefficients in air (D_2) and Henry's Law Constants (H) were obtained from the AWMA/USEPA (1993), the USEPA (1986), or the ASTM (1995), in this order. The universal gas constant is $8.2E-05$ atm-m³/mole- \textdegree K.

This approach assumes that the capillary fringe is small compared to the distance to the top of the groundwater table and that the VOC concentrations are the same at the top of the fringe as in the bulk groundwater. Not correcting for the transport resistance provided by the capillary fringe tends to maximize the flux.

VOC Flux from Subsurface Soil - VOC release is assumed to originate from VOCs in subsurface soil located some distance below ground surface. The modeling equation for VOC flux from subsurface soil (USEPA, 1992a) is:

$$
J = \frac{D_a C_r H P_a^{10} /^3}{K_{oc} f_{oc} L P_t^2}
$$

Where:

 C_s = contaminant concentration in soil (g/cm³; from mg/kg * 1.7 g/cm³ * 10⁻⁶ kg/mg)

 $H =$ Henry's Law Constant (unitless)

 K_{oc} = carbon-water sorption coefficient

 f_{∞} = fraction organic carbon (unitless)

 $L =$ distance from source to point of exit (depth to subsurface soil) (cm)

The carbon-water sorption coefficients (K_{∞}) were obtained from the USEPA (1986) or the ASTM (1995). A fraction organic carbon (f_{α}) of 0.02 is assumed (USEPA, 1992b). Based on the available subsurface soil data from the site, a depth to subsurface soil (L) of 2 ft is used.

By considering the adsorption of the chemicals to the soil particles and the how the strength of that adsorption affects the concentration in the soil gas, the equation accounts for chemical distribution among soil particles, soil pore moisture, and soil gas.

Indoor Air Concentrations

Consistent with the screening level approach, it is assumed that soil gas enters the building by diffusion only. The more complex case in which pressure coupling to the building results in the entry of soil gas by convective transport is not considered. Thus indoor air concentrations may be underestimated. The modeling equation for estimating VOC concentrations in indoor building air (USEPA, 1992a) is:

$$
Cin = E/Q = \frac{\frac{J A F}{A CH V}}{3600}
$$

Where:

 $C =$ contaminant concentration in indoor air $(g/m³)$

 $E =$ contaminant infiltration rate (g/s)

$$
E = J A F
$$

Where:

 $J =$ contaminant flux (g/m² - s) $A = area of subterranean floors/walls (m²)$ $F =$ fraction of floor/walls through which soil gas can enter (unitless)

 $Q =$ building ventilation rate $(m³/s)$

$$
Q = \frac{ACH}{3600} V
$$

Where:

 $ACH =$ building air exchanges/h $3600 = 3600$ s/h $V =$ volume of building $(m³)$

The building air exchange rate (ACH) selected, 1.0 building air exchanges/hour, is the midpoint in the range of values, 0.5 to 1.5, typical of single family residences and slightly greater than the 0.5 to 0.8 range for new or retrofitted energy-efficient structures. A default for F value of 0.01, recommended by the ASTM (1995), is used. The assumptions for the area of subterranean floors/walls (A) and the volume of the buildings (V) are presented above.

The modeling input and results for VOC intrusion from groundwater and from subsurface soil are presented in Tables F-2 and F-3, respectively. The total VOC concentrations in indoor air are presented in Table F-4.

RESPIRABLE PARTICULATES MODEL

The methodology to evaluate the potential exposure of workers to respirable particulates emitted during the course of excavating soil during construction or utility maintenance activities is described below. The modeling requires determination of an emission rate, an emission flux, and the concentration of respirable particulates in the ambient air at the excavation.

Emission Rate and Emission Flux

The emission rate calculation considers the digging of an 1.5 m wide x 5.0 m long x 2.0 m deep excavation by a bulldozer. A bulldozer is assumed for this analysis since an emission rate equation is available for a bulldozer and not a backhoe. Only emissions from the digging of the excavation are calculated; the soil removed from the excavation is assumed to be placed on the side of the excavation and covered to prevent wind-generated respirable particulates.

The following equation (USEPA, 1989) was used to derive an emission rate (in g/s) for respirable particulates (defined in USEPA, 1989 as < 15 microns):

$$
[0.45~(\rm s)^{1.5}~(\rm M)^{-1.4}]
$$

where:

 $s =$ silt content of the soil in weight % $M =$ moisture content of the soil in weight %

A silt content of 8% and a moisture content of 10% are assumed (USEPA, 1993). Solving the above equation results in a respirable particulate emission rate of 0.041 g/s, as presented below:

> $=[0.45 (8)^{1.5} (10)^{-1.4}]$ $= [0.45 (22.63) (0.04)]$ $= 0.405$ kg/hour $= 0.113 \text{ g/s}$

An emission flux of 0.015 g/s -m² is derived by dividing the emission rate by the surface area of the excavation (0.113 $g/s \div 7.5$ m²).

Air Concentrations

Ambient air concentrations for workers exposed to the enhanced excavation emissions were determined using the USEPA-approved Point, Area and Line source (PAL2.1) model, version 89272, (USEPA, 1987) assuming that the excavation represents an area source of emissions. Unlike other area source models, such as the Industrial Source Complex (ISC)

model and SCREEN3, PAL2.1 has the capability of determining impacts above area sources, as well as downwind of a source. PAL2.1 is a diverse model that can be used to estimate dispersion for point, area and line sources using Gaussian-plume steady-state assumptions. Simultaneous modeling of multiple sources and source types can be performed to calculate impacts of non-reactive chemicals at a large number of receptors. Also, user-specified meteorological options allow for input of site-specific conditions that are representative of the site being modeled.

For this analysis, the source was modeled as a $1.5 \text{ m} \times 5.0 \text{ m}$ flat area source. A total of nine receptors were used in the analysis. Eight receptors were placed along the edge of the excavation; one at each of the four corners, and one at the center of each side. In addition, one receptor was placed over the center of the excavation. All receptors were placed at a height of 1.8 m to simulate the height of a worker. The meteorological data consisted of an array of 54 meteorological conditions as used in the USEPA-approved screening level model, SCREEN3 (USEPA, 1995c). These conditions represent 54 combinations of stability classes (1 to 6) and wind speeds (1 m/s to 20 m/s) that could occur in the atmosphere. The wind directions were set so that the wind would blow directly towards each of the receptors. Model options selected for the analysis included: a typical anemometer height of 6.1 meters, a mixing height of 5000 m, and an average temperature of 293 °K. The wind was assumed to be constant below 10 meters (as fixed by PAL2.1). The analysis was performed for both the rural and urban land use classifications. The emission rate of the area source was set at 1 g/s-m². Output was then in the form of $g/m³$ per g/s -m².

Results

The urban and rural modeling analyses predicted maximum 1-hour average unitized impacts of 0.1302 and 0.0268 g/m³ per g/s-m², respectively, at the corners of the excavation. The maximum 1-hour average respirable particulate concentration (in kg/m³) in the ambient air at the excavation is calculated from the following equation:

C = [1-hour unitized impact in g/m³ per g/s-m²] x [emission flux in g/s-m²] x [0.001 kg/g]

Based on the rural land use classification assumed for the site, the maximum 1-hour average respirable particulate concentration is 4.02E-07 kg/mg, as presented below.

> $=[0.0268 \text{ g/m}^3 \text{ per g/s-m}^2]$ * $[0.015 \text{ g/s-m}^2]$ * $[0.001 \text{ kg/g}]$ $= 0.000000402 \text{ kg/m}^3$

Concentrations of the non-volatile chemicals of potential concern associated with this respirable particulate concentration are calculated in the risk assessment.

 $\label{eq:2.1} \frac{1}{\sqrt{2\pi}}\int_{0}^{\infty}\frac{dx}{\sqrt{2\pi}}\,dx\,dx\,.$

 $\frac{1}{3}$

 \mathbf{I}

Henry's Law from: A & WMA / USEPA, 1996. Value for 1,2-dichloroethene is for trans-1,2-dichloroethene.

 \mathcal{L}

TABLE F-2

 \mathbb{Z}

 \sim \overline{A}

VOC INTRUSION FROM GROUNDWATER PETOSKEY MANUFACTURING SITE

 \mathbf{I}

 $\frac{1}{\sqrt{2}}$

TABLE F-3

VOC INTRUSION FROM SUBSURFACE SOIL PETOSKEY MANUFACTURING SITE

where: Cs (g/cm3) = Cs (mg/kg) * 1.7 g/cm3 * 0.000001 kg/mg

 \mathbf{i}

的。
1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,199

TABLE F-4

TOTAL VOC CONCENTRATION (CROUNDWATER + SOIL) PETOSKEY MANUFACTURING SITE

Slab Construction (mg/m^3)

Basement Construction

$\frac{1}{2}$ مد **TABLE F-6** TOXICITY VALUES: POTENTIAL NONCARCINOGENIC EFFECTS **ORAL EXPOSURE**

of the company of the state of the company

 $\sim 10^{-11}$

土

 \sim

一本

<u>मार्केट प्रदेश</u>

 \mathbf{I}

 \mathbf{I}

 \sim

 \sim

 $\mathcal{L}(\mathcal{L}(\mathcal{L}))$ is a set of $\mathcal{L}(\mathcal{L})$. The contribution of $\mathcal{L}(\mathcal{L})$

 ~ 100

 \bar{z}

 $\frac{1}{2}$

 \mathbf{r}

 $\ddot{}$

Notes:

 $-$ = Not Available

HEAST = Health Effects Assessment Summary Tables (USEPA, 1997a).

 \sim

 ϵ

IRIS = Integrated Risk Information System (USEPA, 1997b)

 $NCEA = National Center for Environmental Assessment (USEPA, 1997c).$

* = Uncertainty Factor, to account for inter- and intraspecies extrapolation and extrapolation from subchronic to chronic exposures

** = Modifying Factor, to account for uncertainly in the lest program.

II = Variation in Human Sensitivity

A = Animal to I luman Extrapolation

S = Extrapolation from Lowest Observed Adverse Effect Level (LOAEI.) to No Observed Adverse Effect Level (NOAEL

C = Extrapolation from Subochronic Studies to Chronic

 $O =$ Other factors

 \sim

TABLE F-7

 α

ORAL ABSORPTION EFFICIENCIES PETOSKEY MANUFACTURING SITE

 \sim \sim

 \mathbb{R}^2

 \sim \sim

 $\sim 10^{-10}$

 $\sim 10^7$

 $\label{eq:2.1} \frac{d\mathbf{r}}{d\mathbf{r}} = \frac{1}{\sqrt{2\pi}}\sum_{\mathbf{r}}\frac{d\mathbf{r}}{d\mathbf{r}}\left(\mathbf{r}^{\prime}\right)^{2} \mathbf{r}^{\prime} \left(\mathbf{r}^{\prime}\right)^{2} \mathbf{r}^{\prime} \left(\mathbf{r}^{\prime}\right)^{2} \mathbf{r}^{\prime} \left(\mathbf{r}^{\prime}\right)^{2} \mathbf{r}^{\prime} \left(\mathbf{r}^{\prime}\right)^{2} \mathbf{r}^{\prime} \left(\mathbf{r}^{\prime}\right)^{2} \$

 $\overline{}$

 \mathcal{X}

 ~ 100

 \mathcal{A}^{\pm}

 \overline{a}

 ~ 1

 $\mathcal{L}^{\text{max}}_{\text{max}}$ and $\mathcal{L}^{\text{max}}_{\text{max}}$

 \pm

 $\bar{1}$

 \sim

 \mathbf{I}

 $\overline{1}$

 \sim

 $\langle \cdot |$

 $\bar{1}$

 \sim

 $\mathcal{L}^{\text{max}}_{\text{max}}$ and $\mathcal{L}^{\text{max}}_{\text{max}}$ and $\mathcal{L}^{\text{max}}_{\text{max}}$ and $\mathcal{L}^{\text{max}}_{\text{max}}$

 $\hat{\mathcal{A}}$

 Λ

 $\frac{1}{2}$

 $\,$ $\,$

Notes:

 $-$ = Not Available

IIEAST = Health Effects Assessment Summary Tables (USEPA, I997a).

IRIS = Integrated Risk Information System (USEPA, 1997b).

NCEA = National Center for Environmental Assessment (USEPA, 1997c).

USEPA = Provisional Guidance for Quantitative Risk Assessment of Polycylic Aromatic Hydrocarbons (USKPA, 1993).

 $A =$ Human Carcinogen (sufficient evidence of carcinogenicity in humans)

Bl = Probable Human Carcinogen (limited evidence of carcinogenicity in humans)

 Δ

112 = Probable Human Carcinogen (sufficient evidence of carcinogenicity in animal with inadequate or lack of evidence in humans)

 $C =$ Possible Human Carcinogen (limited evidence of carcinogenicity in animals and inadequate or lack of human data)

 $D = Not$ classifiable as to human carcinogenicity (inadequate or no evidence)

REFERENCES FOR APPENDIX F

- Agency for Toxic Substances and Disease Registry. 1993a. Toxicological Profile for Arsenic. Atlanta, GA: U.S. Public Health Service.
- Agency for Toxic Substances and Disease Registry. 1993b. Toxicological Profile for Lead. Atlanta, GA: U.S. Public Health Service.
- Agency for Toxic Substances and Disease Registry. 1992a. Toxicological Profile for Barium. Atlanta, GA: U.S. Public Health Service.
- Agency for Toxic Substances and Disease Registry. 1992b. Toxicological Profile for Manganese. Atlanta, GA: U.S. Public Health Service.
- Agency for Toxic Substances and Disease Registry. 1992c. Toxicological Profile for Thallium. Atlanta, GA: U.S. Public Health Service.
- Agency for Toxic Substances and Disease Registry. 1991. Toxicological Profile for Antimony. Atlanta, GA: U.S. Public Health Service.
- Agency for Toxic Substances and Disease Registry. 1989a. Toxicological Profile for Cyanide. Atlanta, GA: U.S. Public Health Service.
- Agency for Toxic Substances and Disease Registry. 1989b. Toxicological Profile for Selenium. Atlanta, GA: U.S. Public Health Service.
- Air & Waste Management Association/U.S. Environmental Protection Agency. 1993. "Physical Property Data" provided at the Air Pathway Analysis at Hazardous Waste Sites Workshop, April 5-6, 1993, Washington, DC sponsored by the AWMA and the USEPA.
- American Society for Testing and Materials. 1995. Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites. E 1739-95. West Conshohocken, PA: ASTM, Committee E-50 on Environmental Assessment.
- Andelman, J.B. 1985a. Human exposures to volatile halogenated organic chemicals in indoor and outdoor air. Environmental Health Perspectives. 62: 313-318.
- Andelman, J.B. 1985b. Inhalation exposure in the home to volatile organic contaminants of drinking water. Science of the Total Environment. 47:443-460.
- Andelman, J.B. 1984. Non-ingestion exposures to chemicals in potable waters. Working Paper No. 84-03. Pittsburgh, PA: University of Pittsburgh, Graduate School of Public Health.

Carson, B.L., H.V. Ellis, III and J.L. McCann (Eds.). 1986. Toxicology and Biological Monitoring of Metals in Humans. Chelsea, MI: Lewis Publishers, Inc.

ESHA Research. 1990. The Food Processor II. Nutrient Analysis System.

- Gas Research Institute. 1988. Management of Manufactured Gas Plant Sites Volume III Risk Assessment. GRI-87/0260.3. Chicago, IL: Gas Research Institute.
- U.S. Environmental Protection Agency. 1997a. Health Effects Assessment Summary Tables. FY-1987 Update. EPA-540-R-97-036. Washington, DC: Office of Solid Waste and Emergency Response.
- U.S. Environmental Protection Agency. 1997b. Integrated Risk Information System (IRIS). Accessed through the National Library of Medicine TOXicology data NETwork (TOXNET).
- U.S. Environmental Protection Agency. 1997c. National Center for Environmental Assessment. Cincinnati, OH: Office of Research and Development.
- U.S. Environmental Protection Agency. 1995b. Risk-Based Concentration Table, July-December 1995. Philadelphia, PA: U.S. Environmental Protection Agency, Region III, Office of RCRA, Technical & Program Support Branch.
- U.S. Environmental Protection Agency. 1995c. SCREENS Model User's Guide. EPA-454/B-95-004. Research Triangle Park, NC: U.S. Environmental Protection Agency.
- U.S. Environmental Protection Agency. 1993. Air/Superfund National Technical Guidance Study Series. Models of Estimating Air Emission Rates from Superfund Remedial Actions. EPA-451/R-93-001. Research Triangle Park, NC: Office of Air Quality Planning and Standards.
- U.S. Environmental Protection Agency. 1992a. Air/Superfund National Technical Guidance Study Series. Assessing Potential Indoor Air Impacts for Superfund Sites. EPA-451/R-92-002. Research Triangle Park, NC: Office of Air Quality Planning and Standards.
- U.S. Environmental Protection Agency. 1992b. Air/Superfund National Technical Guidance Study Series. Guidelines for Predictive Baseline Emissions Estimation Procedures for Superfund Sites. Interim Final. EPA-450/1-92-002. Research Triangle Park, NC: Office of Air Quality Planning and Standards.
- U.S. Environmental Protection Agency. 1992c. Dermal Exposure Assessment: Principles and Applications. Interim Report. EPA/600/8-91/01 IB. Washington, DC: Office of Research and Development.
- U.S. Environmental Protection Agency. 1989. Estimation of Air Emissions from Clean-up Activities at Superfund Sites. Report ASF-3. Air Superfund National Technical Guidance Study Series. Volume. 3. Research Triangle Park, NC: U.S. Environmental Protection Agency.
- U.S. Environmental Protection Agency. 1987. User's Guide for PAL 2.0. EPA-600/8-87/009. Research Triangle Park, NC: U. S. Environmental Protection Agency.
- U.S. Environmental Protection Agency. 1986. Superfund Public Health Evaluation Manual. EPA/540/1-86/060. Washington, DC: Office of Emergency and Remedial Response.