

APPENDIX K
ATSDR STRIKE TEAM REQUEST MEMORANDUM

ATSDR RECORD OF ACTIVITY

Site Name: Poles, Inc.

CERCLIS#: ID0002406635

CRS#A752

ROUTING:

M. West, FILE

-AUTHOR INFORMATION-

User ID: JCZ8, KDF9

Date: November 20, 2001

Name: Jane Zhu, Kara Fincham

Time: AM ___ PM ___

Preparer: DHAC

-SITE/EVENT INFORMATION-

Site Name: Poles, Inc.

CERCLIS #: ID0002406635

Cost Recovery #: A752

Address:

City: Oldtown

County: Bonner

State: ID

Zip Code:

Region: 10

Congressional District:

-SITE STATUS-

- (1) NPL Non-NPL RCRA Non-Site specific Federal
(2) Emergency Response Remedial Removal Other:

-ACTIVITIES-

- Incoming Call Public Meeting Health Consult Site Visit Outgoing Call
 Other Meeting Health Referral Info Provided Conference Call Data Review
 Written Response Training Incoming Mail Worker Health Tech Assist
 Emerg Response T-Crit Removal Non T-Critical Removal

Other Text:

Consult Category:

-REQUESTOR AFFILIATION-

Requestor: Karen Larson

Affiliation: ATSDR, Region 10

Phone #1: (206) 553-6978

Phone #2: (888) 980-1649 (pager)

Address:

City: Seattle

State: WA

Zip Code: 02114-2023

County:

Congressional District:

ATSDR RECORD OF ACTIVITY

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-CONTACTS AND AFFILIATION-

(31) Karen Larson
(4) Elke Shaw-Tulloch(4) Mingyi Trimble
() _____

| | | | | | |
|--------------|------------|----------------|-----------------|---------------|---------------|
| 1-EPA | 2-USCG | 3-OTHER FED | 4-STATE ENV | 5-STATE HLT | 6-COUNTY HLT |
| 7-CITY HLTH | 8-HOSPITAL | 9-LAW ENFORCE | 10-FIRE DEPT | 11-POISON CTR | 12-PRIV CITZ |
| 13-OTHER | 14-UNKNOWN | 15-DOD16-DOE | 17-NOAA | 18-OTHR STATE | 19-OTHR CNTY |
| 20-OTHR CITY | 21-INTL | 22-CITIZ GROUP | 23-ELECT.OFF | 24-PRIV. CO | 25-NEWS MEDIA |
| 26-ARMY | 27-NAVY | 28-AIR FORCE | 29-DEF LOG AGCY | 30-NRC | 31-ATSDR |

-PROGRAM AREAS-

| | | | |
|--|--|--|--|
| <input type="checkbox"/> Health Assessment | <input type="checkbox"/> Health Studies | <input type="checkbox"/> Tox Info-profile | <input type="checkbox"/> Worker Health |
| <input type="checkbox"/> Petition Assessment | <input type="checkbox"/> Health Survellnc | <input type="checkbox"/> Tox Info-Nonprofile | <input type="checkbox"/> Admin |
| <input type="checkbox"/> Emergency Response | <input type="checkbox"/> Disease Registry | <input type="checkbox"/> Subst-Spec Research | <u>01</u> Other (Tech Assist) |
| <input type="checkbox"/> Health Consultation | <input type="checkbox"/> Exposure Registry | <input type="checkbox"/> Health Education | |

Narrative Summary:

The Agency for Toxic Substances and Disease Registry (ATSDR) received a request to evaluate ambient air data for Poles, Inc., collected in August 2001, and address the acute and chronic health effects of air contaminants for children and adults at the school adjacent to the facility and in nearby residences (1).

Poles, Inc., located in Oldtown, Idaho, just west of Priest River, is an open vat thermal wood-treating facility, using pentachlorophenol (PCP) as a wood preservative. The facility is closed during December, January, and February, and operates the other 9 months of the year. The nearest residence is approximately 400 feet north of the facility and an elementary school is located approximately 500 feet south of the facility. The elementary school is approximately 30 feet higher in elevation than the site. In 1999, an old wood-fired boiler was replaced by a new oil-fired boiler, reducing the treatment process from 13 hours to 8 hours. Since the facility uses only one dip tank, a maximum of 2 to 2.5 batches are treated a week (2).

In fall 2000, several community members and schoolteachers complained about strong odors emanating from the facility, and expressed concerns of possible health effects. In response to these concerns, the owner changed his schedule, treating the poles during the evening instead of during the day, to reduce possible exposure to PCP in the air to nearby community members.

In August 2001, Ecology and Environment, Inc. collected 27 ambient air samples at eight locations on and around the facility during 3 consecutive days. All samples were collected in a 23-hour period with approximately 300 cubic meters total sample volume and analyzed for semivolatile organic compounds (SVOCs) using EPA Method TO-13A. See Table 1 for sampling location description and Table 2 for summary of analytical data.

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Action Required/Recommendations/Information Provided:

There are 12 SVOCs detected in ambient air samples and the levels of all detected chemicals, except PCP noted below, were below their respective health-based guidelines. PCP was found at levels ranging from non-detect to an estimated maximum of $1.48 \mu\text{g}/\text{m}^3$. The Idaho ambient air standard for PCP is $25 \mu\text{g}/\text{m}^3$ based on noncancer effects and the EPA Region 9 preliminary remediation goals (PRG) for PCP is $0.056 \mu\text{g}/\text{m}^3$ based on carcinogenicity (2,3). On the basis of available data and the following discussions, ATSDR concluded that current exposure to PCP at this site through the air pathway (1) is unlikely to cause imminent adverse health effects in the general population, which (2) will have no apparent increased risk of getting cancer from long-term exposure.

- Due to the chemical and physical properties of PCP, the air pathway is not expected to be a primary route of exposure at this site. Oral ingestion and dermal contact through soil and water pathways should be considered when data becomes available.
- There are no known health guidelines for inhalation exposure for PCP. The PRG cited in the data tables is not an appropriate screening value to assess health concerns at the site. First, the PCP PRG value was calculated using a route-to-route extrapolation. Second, PRG is based on a default exposure frequency of 30 years, 350 days per year. Third, PRG corresponds to a fixed level of 1-in-1 million cancer risk. Wind direction variability and the limited frequency with which logs are treated at the site will not permit exposures frequent enough to cause long-term health effects. Calculation of a realistic exposure scenario at the site indicates no apparent increased cancer risk.
- The sample quantitation limits were above the PRG value; however, when calculating the average dose using half of the detection limits where no PCP was detected, the levels were below the PRG values.
- PCP has been identified in at least 313 of the 1,585 hazardous waste sites on the National Priorities List (NPL). No site was found in the HazDat database where PCP in air presented a public health hazard. For example, Laidlaw Environmental Services Facility in South Carolina had a completed air pathway for PCP, but it was determined to be no apparent public health hazard.
- 2-methylnaphthalene is another chemical of concern. Because there is no PRG value for 2-methylnaphthalene, the PRG value for naphthalene was used. The maximum value for 2-methylnaphthalene is higher than this PRG value, as well as for the ATSDR chronic inhalation reference-dose media evaluation guide (RMEG) value. However, the RMEG is based on the lowest observed adverse effect level (LOAEL) for animal exposures with a safety factor of 1,000. The LOAEL is approximately $1,280 \mu\text{g}/\text{m}^3$ (4). Also, the RMEG is a screening value that uses an exposure scenario inappropriate for the site. Therefore, current site-related exposures are not expected to result in adverse health effects.
- The following limitations for this analysis are noted. (1) The data analysis pertains to current

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exposure levels only. No conclusions can be drawn about past exposure. (2) The sample method reporting limits for the data exceed the PRGs.

ATSDR provided the above information to EPA through regional representative of Region 10 by telephone conversations and e-mails.

Signature: _____

Date: _____

Concurrence: _____

Date: _____

cc:

Maurice West, Deputy Branch Chief, EICB
ATSDR Regional Representative

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References

1. Agency for Toxic Substances and Disease Registry. Technical assistance request to the exposure investigation and consultations branch from Karen Larson, ATSDR Region 10 representative concerning possible air contamination at Poles, Inc., site. Atlanta: US Department of Health and Human Services; October 25, 2001.
2. Agency for Toxic Substances and Disease Registry. Health consultation for Poles, Incorporated, wood treatment facility. Atlanta: US Department of Health and Human Services; 2001 Sep 19.
3. US Environmental Protection Agency. Region 9 preliminary remediation goals. Washington DC: US Environmental Protection Agency; 2001. Available at URL: <http://www.epa.gov>.
4. Agency for Toxic Substance and Disease Registry. Toxicological profile for naphthalene (update). Atlanta: US Department of Health and Human Services; 1995 Aug.

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TABLE 1

**Air Sampling Locations/Descriptions for Poles, Inc.
August 22–25, 2001**

| Location ID | Description of sample location |
|--------------------|--|
| <i>PY04AM</i> | Background |
| <i>PY01AM</i> | Metstation (downwind during all three sampling events) |
| <i>PY02AM</i> | Near bluff (downwind during all three sampling events) |
| <i>PY03AM</i> | Residence (downwind only during August 22–23 sampling event) |
| <i>PY05AM</i> | Next to process area (on-site) (downwind during all three sampling events) |
| <i>PY06AM</i> | Inside school |
| <i>PY07AM</i> | Across river (downwind during all three sampling events) |
| <i>PY08AM</i> | Downwind |

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TABLE 2

**Summary of Air Samples
Pentachlorophenol (PCP) Analytical Results
Poles, Inc.
Oldtown, Idaho
($\mu\text{g}/\text{m}^3$)**

| Location ID | August 22–23 | August 23–24 | August 24–25 |
|-------------|-----------------|----------------|----------------|
| PY04AM | 0.18 U | 0.18 U | 0.16 U |
| PY01AM | 0.16 U | 0.18 U | 0.03 JQK |
| PY02AM | 0.10 JQK | 0.03 JQK | 0.06 JQK |
| PY03AM | <u>1.48 JQK</u> | 0.16 U | 0.16 U |
| PY05AM | 0.01 JQK | <u>0.63 JL</u> | <u>0.49 JL</u> |
| PY06AM* | 0.18 U | 0.16 U | 0.16 U |
| PY07AM | 0.05 JQK | 0.16 U | 0.15 U |
| PY08AM | R | 0.16 U | 0.14 U |

KEY:

*indoor air sample in school

U = The analyte was detected. The associated numerical result is the sample quantitation limit.

J = The analyte was positively identified. The associated numerical result is an estimate.

K = Unknown bias.

L = Low bias.

Q = Analyte detected below the adjusted sample quantitation limit.

R = Rejected.