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**HRS DOCUMENTATION RECORD**  
for  
**Bailey Metal Processors, Inc.**  
**Brady, Texas**

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Austin, Texas

**August 2004**

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# **HAZARD RANKING SYSTEM DOCUMENTATION RECORD**

**VOLUME I OF II**

**for**

**Bailey Metal Processors, Inc. Site  
Brady, McCulloch County, Texas  
SWR 80049**



**Prepared by:**

**Texas Commission on Environmental Quality  
Superfund Site Discovery and Assessment Program  
Austin, Texas**

**August 2004**

**HRS**  
**Documentation Record**

**Bailey Metal Processors, Inc. Site**  
**Brady, McCulloch County, Texas**  
**SWR 80049**

Prepared by

Texas Commission on Environmental Quality  
Site Investigation and Community Relations Section  
Superfund Site Discovery and Assessment Program  
Austin, Texas

August 2004

**HRS DOCUMENTATION RECORD**

**BAILEY METAL PROCESSORS, INC. SITE**

**BRADY, MCCULLOCH COUNTY, TEXAS**

**SWR 80049**

**SIGNATURE PAGE**

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## CONTENTS

	Page
HRS Documentation Record Cover Sheet . . . . .	1
Pathways, Components, or Threats Evaluated . . . . .	1
Notes to the Reader . . . . .	2
HRS Documentation Record . . . . .	3
Site Location . . . . .	3
Site Scoring Summary . . . . .	3
Site Summary . . . . .	5
General Description of the Site . . . . .	5
Worksheet for HRS Site Score . . . . .	16
Soil Exposure Pathway Scoresheet . . . . .	17
Air Migration Pathway Scoresheet . . . . .	18
Reference Listings . . . . .	19

## FIGURES

Figure 1	Site Location Map . . . . .	4
Figure 2	Site Map . . . . .	8

## ATTACHMENTS

- Attachment A - U.S. Geological Survey 7.5 Minute Topographic Map  
    Brady North Quadrangle, 1987
- Attachment B - Site Photographs

## HRS DOCUMENTATION RECORD - REVIEW COVER SHEET

**SITE NAME:** BAILEY METAL PROCESSORS, INC.

**CONTACT PERSON:**

Documentation Record: Kelly Cook 512/239-2525  
TCEQ Project Manager

**PATHWAYS OF CONCERN:**

### Soil Exposure Pathway

Releases of hazardous substances to the Soil Exposure Pathway have been documented in nearby residential and commercial surface soils. The metal antimony was documented as a level II release to surface soil at the nearest occupied residential property (occupied by 5 people), located approximately 225 feet northeast from the site (Ref. 4, Table 2; Ref. 6, p. 3). The metal copper was documented as a level II release to a commercial property located directly adjacent to the north (Ref. 4, Table 3).

### Air Migration Pathway

Releases of hazardous substances to the Air Migration Pathway are the major concern for this site. Hazardous substances have been documented in an observed release to air by direct observation. On May 25, 2004, the Texas Commission on Environmental Quality (TCEQ) documented a release of the hazardous substances antimony, bis (2-ethylhexyl) phthalate, cadmium, copper, di-n-octyl-phthalate, dieldrin and lead by direct observation to the Air Migration Pathway (Ref. 6, p.5; Ref. 4, Tables 13 and 16). The release by direct observation was documented coming off source number 1 (waste pile WA-1), which is located within the 0 to 1/4 mile distance category. Any resident, student, or worker located anywhere within the distance category in which the observed release is located is evaluated as subject to actual contamination (Ref. 1, Section 6.3; Ref. 3, p. 420). Level II concentrations are assigned for observed releases established by direct observation (Ref. 3, pp. 411-412). The Nearest Individual is assigned a value of 45 for level II targets. The level II population within the 0 to 1/4 mile distance category is 51.2 people (Ref. 7, p. 2). The potential population within the remaining distance categories out to 4 miles (not including the level II population already counted within the 0 to 1/4 mile distance category) is 6,726.9 people, distance weighted to 63.2 and divided by 10 for a potential population value of 6.32 people (Ref. 7, pp. 3-19).

## **PATHWAYS, COMPONENTS, OR THREATS NOT SCORED:**

### **Ground Water Pathway**

The Ground Water Migration Pathway was evaluated, but not scored due to the lack of an observed release to potential targets. On May 26, 2004, the TCEQ collected drinking water samples from 3 City of Brady, Public Supply Wells closest to the site. No observed release was documented.

### **Surface Water Pathway**

The Surface Water Migration Pathway was evaluated, but not scored due to the lack of an observed release to potential targets. On May 27, 2004, the TCEQ collected sediment samples from Brady Creek located approximately 1/4 mile southwest from the site. No observed release was documented.

*(Although these pathways have not been scored, the TCEQ is concerned for all pathways surrounding the site. However, scoring these pathways would not have significantly increased the overall site score.)*

## **NOTES TO THE READER**

The following rules were used when citing references in the HRS Documentation Record:

1. All references attached to this report have been stamped with a designated page number (example: Ref. 1, p. 10 = 001 00010). However, if the reference being cited has an original page number, that page number was cited. If the reference being cited has no original page number or the pagination is not complete, then the designated page number is cited.
2. The State predecessor agencies: Texas Water Quality Board (TWQB), Texas Department of Water Resources (TDWR), Texas Water Commission (TWC), Texas Air Control Board (TACB) and Texas Natural Resource Conservation Commission (TNRCC) referred to throughout this report are now known as the Texas Commission On Environmental Quality. The new agency, TCEQ, became effective September 1, 2002, as mandated under State House Bill No. 2912 of the 77th Regular Legislative Session.

## HRS DOCUMENTATION RECORD

**Name of Site:** Bailey Metal Processors, Inc. Site **Date Prepared:** 8/04  
**Site Owner:** Mr. Ronnie Bailey 325/597-2752  
2028 Farm Road Brady Lake  
Brady, Texas 76825  
**Street Address of Site:** Hwy 87, one mile northwest of Brady  
**City, County, State:** Brady, McCulloch County, Texas

### General Location in the State:

(see Figure 1, Site Location Map and Figure 2, Site Map).

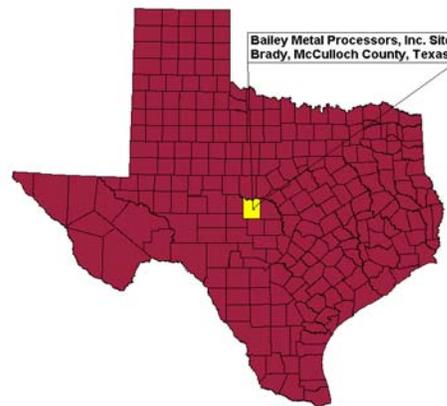
**Topographic Map(s):** US Geological Survey 7.5 Minute Topographic Map, Brady North Quadrangle (see Attachment A).

**Solid Waste Registration Number:** 80049

**Latitude:** 31° 08' 21.15" North

**Longitude:** 99° 20' 51.75" West  
(see Appendix A, Topographic Map)

**TCEQ Region:** 8



### Pathway Scores:

Groundwater Migration Pathway - NS

Surface Water Migration Pathway - NS

Soil Exposure Pathway - 6.6

Air Migration Pathway - 12.90

(NS = Pathway Score is < 1.0 and will not significantly increased the overall site score - Not Scored)

**HRS SITE SCORE: 7.25**

Figure 1

## General Site Information

The Bailey Metal Processors site ("the Site") is a five acre site located on Highway 87, one mile northwest of Brady, Texas. The Site was operated as a scrap metal dealer, primarily conducting copper and lead reclamation operations. Paper, plastic and lead coatings were removed from wires to reclaim the metals. Two furnaces at the site were used to burn off the plastic insulation on the wire (Ref. 8).

There are documented releases of ash and metallic residues to the soil. Analytical results for a soil samples collected from around the furnaces indicate the soil contains elevated levels of lead at 67,400 ppm, 74,900 ppm, 122,000 ppm with a leachable concentration of 517 ppm. In addition, plastic chips (wire cutting wastes) and incinerator ash are stockpiled onsite (Ref. 9).

The land use in the vicinity of the site includes residential, agricultural and municipal. The site is bordered to the south by a railroad, bordered to the north by the Brady Independent School District Bus Barn and two mobile homes. Access to the site is unrestricted. There is only a cattle gate at the entrance, and a portion of the fence located along the south side of the property has fallen (Ref. 16).

## Site Background

On June 7, 1995, an inspection conducted at the Bailey Metal Processors site by the TCEQ San Angelo Regional 8 Office, documented releases of ash and metallic residues to the soil. Analytical results for a soil sample collected from around the furnaces (sample SW-1621 02) indicate the soil contains elevated levels of lead (up to a total concentration of 67,400 ppm). Analytical results from an additional soil sample (sample sw-162003) collected from the north end of the former lead casing stripping building also indicate the presence of elevated levels of lead (up to a total concentration of 74,900 ppm). Additional soil samples collected during a May 24, 1999 inspection indicated lead levels up to 122,000 ppm with a leachable concentration of 517 ppm, exceeding the regulatory limit of 5.0 ppm. During the June 8 and 12, 2001 inspection, it was observed that no remedial activities had occurred. The investigator documented stained soil and soils contaminated with fluff, plastic chips and incinerator ash, and documented that fluff and plastic chips were stockpiled onsite (Ref. 9).

On June 17, 1998, Bailey Metal Processors and the TCEQ (formerly "TNRCC") entered into an Agreed Order (i.e., Docket No. 95-1431-IHW-E) due to contamination at the site. On April 29, 1999, Bailey Metal Processors, Inc. filed for Chapter 7 bankruptcy. After the bankruptcy filing, Brady National Bank assumed control of the site through a lien and have sold assets from the site. The bank employed John Ed Weaver to oversee the selling of site assets. The bank never foreclosed upon its lien in the real property (Ref. 8, 10, 13, and 17).

On May 24, 1999, TCEQ conducted a multi-media investigation was conducted to determine compliance with applicable Agreed Order technical requirements. BMPs failure to comply with the requirements was documented during the investigation. During the investigation, John Ed

Weaver, Brady National Bank employee, and Kim King, President and Chief Executive Officer of Brady National Bank, were present due to the bankruptcy filing (Ref. 11).

On June 8 and 12, 2001, the TCEQ performed a Case Development Investigation (CDI) to determine compliance with applicable requirements. Observations noted by the investigators indicated no remedial activities had occurred (Ref. 15).

On September 7, 2001, staff of the TCEQ Enforcement Division conducted a record review of the enforcement documents related to Bailey Metal Processors site, and determined that enforcement was no longer an effective remedy for the site (Ref. 8).

On September 19, 2001, the TCEQ Enforcement Division referred the Bailey Metal Processors site to the Remediation Division for evaluation by the Superfund Program. Enforcement Division staff made the following site determinations: (1) documented releases of hazardous substances had occurred ; (2) the site is inactive; (3) Bailey Metal Processors filed for Chapter 7 bankruptcy and there are no funds in the estate to address the cleanup; and, (4) enforcement is no longer an effective option for addressing the contamination at the site (Ref. 8).

In a letter dated April 24, 2002, from Combest Geoscience on behalf of Brady National Bank, Combest Geoscience indicated that Brady National Bank would like to submit an application to the TCEQ Voluntary Cleanup Program to proceed with a voluntary cleanup at the site (Ref. 19). An application for the Voluntary Cleanup Program was never received by the TCEQ.

On December 16, 2002, TCEQ investigators performed a complaint and Compliance Evaluation Investigation (CDI) at the site due to the alleged burning of copper wire. It was determined that a Brady National Bank employee had allowed individuals access to the site and burning activities had occurred. Brady National Bank was referred for formal enforcement since the bank was in control of the site when burning activities caused further heavy metal hazardous waste contamination of the site (Ref. 14).

In conversations held with Mr. and Mrs. Bailey, Deputy Susan Price, Mr. King, and Mr. Prentis Smith on December 16 and 17, 2002, the follow activities have been identified. On December 14, 2002, Mr. Weaver, bank employee, allowed access to the site by opening the gates for Mr. Smith. Mr. Smith was to remove plastic and metal from the site. After completion, Mr. Weaver would return to lock the gates. However, after obtaining access, Mr. Smith began to burn copper wire he had obtained from Borden in Brady, Texas (Ref. 13).

While returning home from Abilene, the Bailey's came upon their site and noticed copious amounts of smoke billowing from the back building. The Bailey's entered the site and photographed the smoke and burning wire in the building. These photographs are utilized in Deputy Prices report. After documenting the burning, the fire department and sheriff's office were requested to respond (Ref. 13).

Upon arrival, the fire department extinguished the fire and flushed the waste ash across the floor and outside the building. Access to the property for all individuals was at that time prohibited by the Baileys (Ref. 13).

During the investigation on December 16, 2002, the investigators photographed the areas still wet from the extinguishing of the fire. The investigators also sampled several waste ash locations to determine compliance with industrial solid and municipal hazardous waste regulations. Analyses indicate the waste ash is hazardous for lead and chromium (Ref. 13 and 14).

On June 27, 2003, the TCEQ Enforcement Division notified the Brady National Bank that enforcement actions would be pursued against them (Ref. 18).

On August 19, 2003, the TCEQ Enforcement Division determined that formal enforcement action was not warranted against Brady National Bank at this time. All of the violations documented in the Notice of Enforcement letter dated February 13, 2003, and the Proposed Agreed Order, were withdrawn (Ref. 12).

On March 1, 2004, the TCEQ San Angelo Region 8 Office referred the site back to the Remediation Division, Superfund Site Discovery and Assessment Team (Ref. 16).

During the week of May 24, 2004, the TCEQ, Superfund Site Discovery and Assessment Program (SSDAP) conducted sampling activities at the Bailey Metals Processors, Inc. Site in Brady, Texas. The purpose of this investigation was to document the release(s) or potential release(s) of hazardous substances from the site. Releases of hazardous substances to the soil exposure pathway was documented in nearby residential and commercial surface soils, and a release of hazardous substances to the air migration pathway was documented in an observed release to air by direct observation. (Ref. 4 and 5).

Immediate removal actions planned for July 2004 were cancelled due to access problems. These actions were to consist of the on-site treatment of approximately 500 cubic yards of wire cutting wastes (determined hazardous for lead and cadmium), off-site disposal of the treated wastes, the disposal of 500 gallons waste oil, and the installation of a security fence around the perimeter of the site. Mr. Ronnie Bailey, the current site owner, has stated refused to sign an access agreement to allow TCEQ to conduct the immediate removal actions. The TCEQ Litigation Division is in the process of referring the site to the Attorney General of Texas to gain access to the site.

Figure 2

- Source Background Concentrations:

Sample ID	Sample Type	Date	Hazardous Substance	Hazardous Substance Concentration	Sample Quantitation Limit	Reference
SO-1 0-6	Soil	5/27/2004	Antimony	0.18 J mg/kg	0.13	4
SO-1 0-6	Soil	5/27/2004	Bis (2-ethylhexyl) phthalate	U ug/kg	55.00	4
SO-1 0-6	Soil	5/27/2004	Cadmium	0.83 mg/kg	0.03	4
SO-1 0-6	Soil	5/27/2004	Copper	107.00 mg/kg	0.36	4
SO-1 0-6	Soil	5/27/2004	Di-n-octyl phthalate	U ug/kg	40.00	4
SO-1 0-6	Soil	5/27/2004	Dieldrin	U ug/kg	0.43	4
SO-1 0-6	Soil	5/27/2004	Indeno(1,2,3-cd)pyrene	U ug/kg	67.00	4
SO-1 0-6	Soil	5/27/2004	Lead	50.60 mg/kg	0.80	4
SO-1 0-6	Soil	5/27/2004	Mercury	121.00 ug/kg	1.90	4

- Source Number 1 Samples:

Sample ID	Sample Type	Date	Hazardous Substance	Hazardous Substance Concentration	Sample Quantitation Limit	Reference
WA-1C	Waste Pile	5/25/2004	Antimony	652.00 mg/kg	35.00	4
WA-1C	Waste Pile	5/25/2004	Bis (2-ethylhexyl) phthalate	210,000.00 ug/kg	5,700.00	4
WA-1C	Waste Pile	5/25/2004	Cadmium	32.40 mg/kg	0.04	4
WA-1C	Waste Pile	5/25/2004	Copper	53,800.00 mg/kg	250.00	4
WA-1C	Waste Pile	5/25/2004	Di-n-octyl phthalate	38,000.00 ug/kg	420.00	4
WA-1C	Waste Pile	5/25/2004	Dieldrin	20.00 ug/kg	0.89	4
WA-1C	Waste Pile	5/25/2004	Lead	3,110.00 mg/kg	22.00	4

- Source Number 2 Samples:

Sample ID	Sample Type	Date	Hazardous Substance	Hazardous Substance Concentration	Sample Quantitation Limit	Reference
WA-2C	Waste Pile	5/25/2004	Antimony	509.00 mg/kg	27.00	4
WA-2C	Waste Pile	5/25/2004	Bis (2-ethylhexyl) phthalate	290,000.00 ug/kg	5,500.00	4
WA-2C	Waste Pile	5/25/2004	Cadmium	48.20 mg/kg	0.57	4
WA-2C	Waste Pile	5/25/2004	Copper	170,000.00 mg/kg	380.00	4
WA-2C	Waste Pile	5/25/2004	Di-n-octyl phthalate	95,000.00 ug/kg	4,000.00	4
WA-2C	Waste Pile	5/25/2004	Dieldrin	42.00 ug/kg	0.86	4
WA-2C	Waste Pile	5/25/2004	Lead	3,500.00 mg/kg	17.00	4

- Source Number 3 Samples:

Sample ID	Sample Type	Date	Hazardous Substance	Hazardous Substance Concentration	Sample Quantitation Limit	Reference
WA-3	Waste Pile	5/27/2004	Antimony	260.00 mg/kg	22.00	4
WA-3	Waste Pile	5/27/2004	Bis (2-ethylhexyl) phthalate	17,000.00 ug/kg	130.00	4
WA-3	Waste Pile	5/27/2004	Cadmium	9.45 mg/kg	0.05	4
WA-3	Waste Pile	5/27/2004	Copper	49,700.00 mg/kg	62.00	4
WA-3	Waste Pile	5/27/2004	Di-n-octyl phthalate	4,000.00 ug/kg	96.00	4
WA-3	Waste Pile	5/27/2004	Lead	3,030.00 mg/kg	14.00	4

- Source Number 4 Samples:

Sample ID	Sample Type	Date	Hazardous Substance	Hazardous Substance Concentration	Sample Quantitation Limit	Reference
WA-6	Waste Pile	5/27/2004	Antimony	50.10 mg/kg	0.15	4
WA-6	Waste Pile	5/27/2004	Bis (2-ethylhexyl) phthalate	410,000.00 ug/kg	8,700.00	4
WA-6	Waste Pile	5/27/2004	Cadmium	8.52 mg/kg	0.03	4
WA-6	Waste Pile	5/27/2004	Copper	43,700.00 mg/kg	85.00	4
WA-6	Waste Pile	5/27/2004	Di-n-octyl phthalate	130,000.00 ug/kg	6,400.00	4
WA-6	Waste Pile	5/27/2004	Lead	2,610.00 mg/kg	19.00	4
WA-6	Waste Pile	5/27/2004	Mercury	1,340.00 ug/kg	4.00	4

- Source Number 5 Samples:

Sample ID	Sample Type	Date	Hazardous Substance	Hazardous Substance Concentration	Sample Quantitation Limit	Reference
WA-7C	Waste Pile	5/25/2004	Antimony	809.00 mg/kg	31.00	4
WA-7C	Waste Pile	5/25/2004	Bis (2-ethylhexyl) phthalate	1,400,000.00 mg/kg	11,000.00	4
WA-7C	Waste Pile	5/25/2004	Cadmium	46.10 mg/kg	0.33	4
WA-7C	Waste Pile	5/25/2004	Copper	134,000.00 mg/kg	220.00	4
WA-7C	Waste Pile	5/25/2004	Di-n-octyl phthalate	400,000.00 mg/kg	8,100.00	4
WA-7C	Waste Pile	5/25/2004	Dieldrin	86.00 P ug/kg	0.87	4
WA-7C	Waste Pile	5/25/2004	Lead	3,280.00 mg/kg	20.00	4

- Source Number 6 Samples:

Sample ID	Sample Type	Date	Hazardous Substance	Hazardous Substance Concentration	Sample Quantitation Limit	Reference
BM1	Soil	5/24/1999	Lead	122,000.00 mg/kg	250.00	16
BM5	Soil	5/24/1999	Lead	25,000.00 mg/kg	250.00	16
SO-18C 0-3	Soil	5/25/2004	Antimony	0.96 mg/kg	0.15	4
SO-18C 0-3	Soil	5/25/2004	Dieldrin	1.60 J ug/kg	0.45	4
SO-18C 0-3	Soil	5/25/2004	Indeno(1,2,3-cd)pyrene	220.00 J ug/kg	70.00	4
SO-20 0-0.5	Soil	5/25/2004	Copper	378.00 mg/kg	0.32	4
SO-23G 0-6	Soil	5/25/2004	Bis (2-ethylhexyl) phthalate	5,400.00 ug/kg	59.00	4
SO-23G 0-6	Soil	5/25/2004	Copper	1,060.00 mg/kg	0.46	4
SO-24G 0-6	Soil	5/25/2004	Bis (2-ethylhexyl) phthalate	180.00 J ug/kg	56.00	4
SO-24G 0-6	Soil	5/25/2004	Copper	1,350.00 mg/kg	7.50	4
SO-24G 0-6	Soil	5/25/2004	Indeno(1,2,3-cd)pyrene	240.00 J ug/kg	68.00	4
SO-24G 0-6	Soil	5/25/2004	Lead	707.00 mg/kg	17.00	4

**WORKSHEET FOR COMPUTING HRS SITE SCORE**

	S pathway	S <sup>2</sup> pathway
Ground Water Migration Pathway Score (S <sub>gw</sub> )	NS	NS
Surface Water Migration Pathway Score (S <sub>sw</sub> )	NS	NS
Soil Exposure Pathway Score (S <sub>s</sub> )	6.6	43.56
Air Migration Score (S <sub>a</sub> )	12.9024	166.4719
$S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2$		210.0319
$(S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2)/4$		52.5079
$\sqrt{(S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2)/4}$		7.25

(NS = Pathway Score is < 1.0 and will not significantly increased the overall site score - Not Scored)

**TABLE 5-1 --SOIL EXPOSURE PATHWAY SCORESHEET**

Factor categories and factors	Maximum Value	Value Assigned
<b>Likelihood of Exposure:</b>		
1. Likelihood of Exposure (Ref. 4, Table 2 - Antimony)	550	550
<b>Waste Characteristics:</b>		
2. Toxicity (Ref. 2 and 4 - Antimony)	(a)	10000
3. Hazardous Waste Quantity (Default)	(a)	10
4. Waste Characteristics	100	18
<b>Targets:</b>		
5. Resident Individual	50	45
6. Resident Population:		
6a. Level I Concentrations	(b)	
6b. Level II Concentrations (Ref. 4)	(b)	5
6c. Population (lines 6a + 6b)	(b)	5
7. Workers (Ref. 4)	15	5
8. Resources	5	
9. Terrestrial Sensitive Environments	©)	
10. Targets (lines 5 + 6c + 7 + 8 + 9)	(b)	55
<b>Resident Population Threat Score</b>		
11. Resident Population Threat Score (lines 1 x 4 x 10)	(b)	544500
<b>Nearby Population Threat</b>		
<b>Likelihood of Exposure:</b>		
12. Attractiveness/Accessibility	100	
13. Area of Contamination	100	
14. Likelihood of Exposure	500	
<b>Waste Characteristics:</b>		
15. Toxicity	(a)	
16. Hazardous Waste Quantity	(a)	
17. Waste Characteristics	100	
<b>Targets:</b>		
18. Nearby Individual	1	
19. Population Within 1 Mile	(b)	
20. Targets (lines 18 + 19)	(b)	
<b>Nearby Population Threat Score</b>		
21. Nearby Population Threat (lines 14 x 17 x 20)	(b)	
<b>Soil Exposure Pathway Score:</b>		
22. Pathway Score <sup>d</sup> (S <sub>s</sub> ), [(11+21)/82,500, subject to max of 100]	100	6.6

<sup>a</sup> Maximum value applies to waste characteristics category

<sup>b</sup> Maximum value not applicable

<sup>c</sup> No specific maximum value applies to factor. However, pathway score based solely on terrestrial sensitive environments is limited to a maximum of 60

<sup>d</sup> Do not round to nearest integer

**TABLE 6-1 --AIR MIGRATION PATHWAY SCORESHEET**

Factor categories and factors	Maximum Value	Value Assigned
<b>Likelihood of Release:</b>		
1. Observed Release (Ref. 4, Tables 13 and 16; Ref. 6, p. 5; Observed release by direct observation from Source 1)	550	550
2. Potential to Release:		
2a. Gas Potential to Release	500	
2b. Particulate Potential to Release	500	
2c. Potential to Release (higher of lines 2a and 2b)	500	
3. Likelihood of Release (higher of lines 1 and 2c)	550	550
<b>Waste Characteristics:</b>		
4. Toxicity/Mobility (Ref. 2 and 4 - Mercury)	(a)	2000
5. Hazardous Waste Quantity (Default)	(a)	100
6. Waste Characteristics	100	18
<b>Targets:</b>		
7. Nearest Individual (Ref. 1, Section 6.3.1; Ref. 3, pp. 412 and 420; Ref. 7, p. 2)	50	45
8. Population:		
8a. Level I Concentrations	(b)	0
8b. Level II Concentrations (Ref. 1, Section 6.3; Ref. 3, p. 412; Ref. 7, p. 2)	(b)	51.2
8c. Potential Contamination (Ref. 1, Section 6.3; Ref. 7, pp. 3-19; Distance weighted population = $63.2/10 = 6.32$ )	©	6.32
8d. Population (lines 8a + 8b + 8c)	(b)	57.52
9. Resources	5	5
10. Sensitive Environments:		
10a. Actual Contamination	©	
10b. Potential Contamination	©	
10c. Sensitive Environments (lines 10a + 10b)	©	0
11. Targets (lines 7 + 8d + 9 + 10c)	(b)	107.52
<b>Air Migration Pathway Score:</b>		
12. Pathway Score ( $S_a$ ) $[(\text{lines } 3 \times 6 \times 11)/82,500]^d$	100	12.90

<sup>a</sup> Maximum value applies to waste characteristics category

<sup>b</sup> Maximum value not applicable

<sup>c</sup> No specific maximum value applies to factor. However, pathway score based solely on sensitive environments is limited to a maximum of 60.

<sup>d</sup> Do not round to nearest integer

## REFERENCES

<u>Reference Number</u>	<u>Description of the Reference</u>
1.	U.S. Environmental Protection Agency, 40 CFR Part 300, Hazardous Ranking System, Appendix A, 55 FR 51583, December 14, 1990 (not attached).
2.	U.S. Environmental Protection Agency, Superfund Chemical Data Matrix (SCDM). January 2004. 16 pages.
3.	U.S. Environmental Protection Agency, Hazard Ranking System Guidance Manual Publication 9345.1-07, November 1992 (not attached).
4.	URS Corporation, Field Sampling and Analysis Report for Bailey Metal Processors Site. Prepared for the Texas Commission on Environmental Quality on July 29, 2004. 247 pages.
5.	ECS Environmental Chemistry Services, Data Usability Summary for Bailey Metals Site. Prepared for URS Corporation May 25-27, 2004. 418 pages.
6.	Texas Commission on Environmental Quality, Field Book Notes for Bailey Metal Processors Site. Prepared by Kelly Cook April 27, 2004 through May 27, 2004. 10 pages.
7.	Texas Commission on Environmental Quality, Population Data within Specified Distance Intervals. Based on 1990 Census data. 1999 TIGER/Line Census Blocks. 24 pages.
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