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HRS DOCUMENTATION RECORD

for

Melton Kelly Property Chatfield, Texas

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HAZARD RANKING SYSTEM DOCUMENTATION RECORD

for

**Melton Kelly Property Site
Navarro County, Texas
TXD000852111
SWR82352**

Volume I of II

Prepared by:

**Texas Natural Resource Conservation Commission
Superfund Site Discovery and Assessment Program
Austin, Texas**

January 2001

HRS
Documentation Record

Melton Kelly Property Site
Navarro County, Texas

TX0000852111
TNRCC SWR No. 82352

Prepared by

Texas Natural Resource Conservation Commission
Site Assessment and Management Section
Superfund Site Discovery and Assessment Program
Austin, Texas

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HRS DOCUMENTATION RECORD

MELTON KELLY PROPERTY

NAVARRO COUNTY, TEXAS

SWR 82352

SIGNATURE PAGE

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ATTACHMENTS

Attachment A - Site Photographs

Attachment B - US Geological Survey 7.5 Minute Topographic Maps
Styx Quadrangle. 1962.
Rosser SW Quadrangle. 1962.

Attachment C - Summary of Ground Water Population

Attachment D - EPA SSI Sample Result Tables

HRS DOCUMENTATION RECORD - REVIEW COVER SHEET

SITE NAME: MELTON KELLY PROPERTY SITE

CONTACT PERSON:

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

PATHWAYS OF CONCERN:

Ground Water Pathway

Releases of hazardous substances to the ground water pathway are the major concern for this site. Hazardous substances have been documented in the surface soils and shallow ground water beneath the site. The Upper Trinity River Quaternary Alluvium and Nacatoch Sand are the aquifers of concern. The Ground Water Pathway is being scored based on actual contamination to area drinking water wells within the Quaternary alluvial deposits.

PATHWAYS, COMPONENTS, OR THREATS NOT EVALUATED:

Surface Water Pathway

The Ground Water to Surface Water Migration Component of the Surface Water Migration Pathway was not evaluated due to the lack of an observed release. The Drinking Water Threat in the Surface Water Overland/Flood Migration Pathway was not evaluated due to the lack of drinking water targets within the 15 mile Target Distance Limit (TDL). The Human Food Chain Threat in the Surface Water Overland/Flood Migration Pathway was not evaluated due to the lack of an observed release with a bioaccumulation factor value greater than or equal to 500. The Environmental Threat in the Surface Water Overland/Flood Migration Pathway was not evaluated due to the lack of an observed release.

Soil Exposure Pathway

The Soil Exposure Pathway was not evaluated due to the lack of targets and because the inclusion of this pathway would not significantly affect the site score.

Air Migration Pathway

The Air Migration Pathway was not evaluated due to the lack of an observed release and because the inclusion of this pathway would not significantly affect the site score.

(Although these pathways have not been evaluated, the TNRCC is concerned for all pathways surrounding the site. However, evaluation of 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 = 01 010).

The State predecessor agencies: Texas Water Quality Board (TWQB), Texas Department of Water Resources (TDWR), Texas Water Commission (TWC), and Texas Air Control Board (TACB), referred to throughout this report are now known as the Texas Natural Resource Conservation Commission (TNRCC). The new agency, TNRCC, became effective September 1, 1993, as mandated under State Senate Bill 2 of the 73rd Regular Legislative Session.

HRS DOCUMENTATION RECORD

Name of Site: Melton Kelly Property Site

Date Prepared: 01/01

Solid Waste Registration (SWR) Number: 82352

Site Owners: The Heirs of Melton E. Kelly (Deceased):
Melsha Kelly and Melton Kelly Jr
124 Foster Avenue
Oakland, CA

Site Street Address: County Road 3250

City, County, State: Navarro County, Texas

General Location in the State:

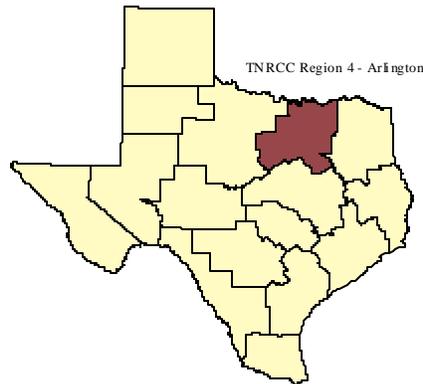
(see Figure 1, Site Location and Surrounding Land Use Map and Figure 2, Site Sketch Map).

Topographic Map(s): US Geological Survey 7.5 Minute Topographic Map, Styx Quadrangle 1962 and Rosser SW Quadrangle 1962.

Latitude: 32° 17' 13" North

Longitude: 96° 22' 12" West
(see Appendix B, Topographic Maps)

TNRCC Region: 4



Pathway Scores:

Groundwater Migration Pathway - 13.49

Surface Water Migration Pathway - NE

Soil Exposure Pathway - NE

Air Migration Pathway - NE

(NE - Not Evaluated)

SITE SUMMARY**General Description of the Site:**

The Melton Kelly Property site (the "Site") is located on NE County Road 3250, approximately 1.5 miles south of FM 85, in Navarro County, Texas. The site is located in a rural agricultural area, approximately four miles northeast of Chatfield, Texas (see Figure 1, Site Location and Surrounding Land Use Map). The site is located on a 46 acre tract of pastureland (Ref. 3, p. 12). The only structure located on the site is a metal sided wooden shed that was attached to a residence which burned down on or before February 1, 1994 (Ref. 25, p.24). The site is bordered to the north by another residence and native pastureland, to the east by CR 3250 and undeveloped land, to the south by undeveloped property, a gravel road, former school house, church and a cemetery, and to the west by undeveloped wooded wetlands. The nearest occupied residence is located approximately 1,400' (0.26 mi) northeast of the site along CR 3250 (Ref. 4, pp. 2-3).

The site consists of three identifiable burn areas that were used for metal salvage operations (see Figure 2, Site Sketch of Contaminated Areas Map). On or before February 1, 1994, salvage material (i.e. insulated copper wire, tubing, electrical parts, switches and circuit cards) was transported to the site, placed in piles and burned using automobile tires to ignite the debris. Recoverable metals were removed from the ash piles and presumably sold for salvage value. Remaining scrap and ash-like wastes were left in place (Ref. 4, pp. 3-4; Ref. 25, p.24).

Site History:

The site was identified to TNRCC on February 1, 1994 by an anonymous citizens complaint forwarded through State Representative Martin Frost's office. The complaint alleged uncontrolled burning at the site (Ref. 25, p.23).

TNRCC's Arlington Regional Office investigators inspected the property on February 11, 1994. They discovered eight piles of ash at the site and collected soil and water samples from the ash piles and surrounding areas. The analytical results from two composite soil samples collected from soil containing ash residue revealed Toxicity Characteristic Leaching Procedure (TCLP) concentrations of 43.5 and 10.4 ppm for lead (EPA Hazardous Waste Number D008); total concentrations of 17,000 and 23,000 ppm for lead; 31 and 46 ppm for cadmium; 104 and 110 ppm for chromium; 78,000 and 41,200 ppm for copper; 9,200 and 4,200 ppm for zinc and 31 and 45 ppm for nickel (Ref. 25, pp.10-19).

On July 16, 1994, the Navarro County Sheriffs Office and the Chatfield Volunteer Fire Department responded to a report of a large fire at the site. The Sheriffs Office incident report documented the occurrence of a large fire in the back pasture of the site, where several piles of copper wire had been burning along the creek bank. No persons were located on-site at the time of the fire, however, a receipt from Atlas Scrap Management, made out to Jose Deleon of Dallas, was found in the pasture (Ref. 25, p. 21). It is unknown if any fires have occurred at the site since this date.

During the week of April 12 through 15, 1999, the TNRCC Superfund Site Discovery and Assessment

Program (SSDAP) conducted a U.S. Environmental Protection Agency (EPA) Screening Site Inspection (SSI) sampling event at the site. The primary objective of this event was to document the release(s) or potential release(s) of hazardous substances from the site to the

Figure 1

shallow ground water in the area and surface waters flowing from the site. During the SSI, five (5) composite soil/sediment samples, SO-04 (FGJ26/MFJP03), SO-05 (FGJ27/MFJP04) and its duplicate SO-06 (FGJ28/MFJP05), SO-07 (FGJ29/MFJP06) SO-08 (FGJ30/MFJP07) and SE-10 (MFJN99/FGJ22), were collected from the three burn areas to assess remaining soil contamination (see Tables 1 through 4 for source sample results and Figure 2, Site Sketch of Contaminated Areas Map for sample locations) (Ref. 18, pp. 29-33 and 43).

Table 1

Source Samples - Inorganic						
Constituent mg/Kg	SO-04 MFJP03 Source	SO-05 MFJP04 Source	SO-06 MFJP05 Dup of SO-05	SO-07 MFJP06 Source	SO-08 MFJP07 Source	SE-10 MFJN99 Adjacent Pond
Aluminum	15000 [46.7]	53700 [59.6]	46800 [57.1]	43800 [61.2]	1870 [43.4]	44400 [78.7]
Antimony	NDJv [14.0]	1290Jv [17.9]	1130Jv [17.1]	861Jv [18.4]	NDJv [13.0]	1150 Jv [23.6]
Arsenic	6.9 [2.3]	9.5 [3.0]	9.0 [2.9]	14.0 [3.1]	1.1LJv [2.2]	11.0 [3.9]
Barium	102 [46.7]	794 [59.6]	783 [57.1]	487 [61.2]	20.2L [43.4]	618 [78.7]
Cadmium	1.2J [1.2]	56.0 [1.5]	56.1 [1.4]	44.4 [1.5]	1.2J [1.1]	43.3 [2.0]
Chromium	25.5 [2.3]	114 [3.0]	117 [2.9]	111 [3.1]	5.4 [2.2]	86.7 [3.9]
Copper	153 [5.8]	117000 [7.5]	148000 [7.1]	91900 [7.7]	7.2 [5.4]	77100 [9.8]
Lead	220 [0.7]	22900 [0.9]	24100 [0.9]	53900 [0.9]	5.8 [0.65]	21700 [1.2]
Nickel	25.7J [9.4]	75.3 [11.9]	64.0 [11.4]	69.0 [12.2]	NDJ [8.7]	60.5 [15.8]
Potassium	2080 [1168]	764L [1490]	848L [1429]	542L [1529]	238L [1085]	334L [1969]
Selenium	ND [1.2]	5.2J^ [1.5]	4.8J^ [1.4]	ND [1.5]	ND [1.1]	ND [2.0]
Silver	ND [2.3]	43.9 [3.0]	55.9 [2.9]	28.7 [3.1]	ND [2.2]	58.8 [3.9]
Sodium	2900 [1168]	1540 [1490]	1580 [1429]	842L [1529]	358L [1085]	1010L [1969]
Thallium	0.68L [2.3]	ND [3.0]	1.1L [2.9]	9.3 [3.1]	ND [2.2]	0.8L [3.9]
Vanadium	45.1 [11.7]	7.6L [14.9]	12.5L [14.3]	15.7 [15.3]	5.5L [10.9]	12.6L [19.7]
Zinc	1640 [4.7]	4220 [6.0]	4860 [5.7]	4170 [6.1]	34.9 [4.3]	4630 [7.9]
References	Ref. 22, p.26	Ref. 22, p.27	Ref. 22, p.28	Ref. 22, p.29	Ref.22, p.30	Ref. 22, p.22

Notes: ND = not detected at the laboratory reported quantitation limit.

[SQL] = Sample Quantitation Limit.

L = reported concentration is between the IDL and CRDL.

Shaded and **bold** values indicate detected at or above the highest background value.

J, J[^], J_v = result is estimated (J), with high bias (J[^]) or with low bias (J_v), due to a quality control parameter, i.e., matrix spike, serial dilution, FAA spike recovery, etc.

Table 2

Source Samples - Volatiles					
Constituents Fg/Kg	SO-05 FGJ27RE Source	SO-06 FGJ28RE Dup of SO-05	SO-07 FGJ29 Source	SO-08 FGJ30 Source	SE-10 FGJ22 Adjacent Pond
Xylene (total)	2LJ [15]	6J [15]	37 [15]	ND [11]	ND [18]
References	Ref.20, p.62	Ref.20, p.66	Ref.20, p.68	Ref. 20,p.70	Ref.20,p.50

Notes: ND = not detected at the laboratory reported quantitation limit.

[SQL] = Sample Quantitation Limit.

J = result is estimated due to a quality control parameter.

Shaded and **bold** values indicate detected at or above the highest background value.

Table 3

Source Samples - Semivolatiles						
Constituents Fg/Kg	SO-04 FGJ26 Source	SO-05 FGJ27/DL Source	SO-06 FGJ28/DL Dup of SO-05	SO-07 FGJ29/DL Source	SO-08 FGJ30 Source	SE-10 FGJ22/DL Adjacent Pond
4-Methylphenol	24LJ [390]	730 [480]	380LJ [480]	340LJ [4900]	22LJ [360]	300LJ [610]
Naphthalene	33LJ [390]	8700J [480]	8500J [480]	5700 [4900]	ND [360]	6900J [610]
2-Methylnaphthalene	28LJ [390]	22000 [19000]	19000J [480]	16000 [4900]	ND [360]	29000 [24000]
Dibenzofuran	ND [390]	1300LJ [19000]	4600J [480]	1100LJ [4900]	ND [360]	1200 [610]
Fluorene	ND [390]	ND [19000]	NDJ _v [480]	3100LJ [49000]	ND [360]	880 [610]
Phenanthrene	ND [390]	7900 [19000]	8500LJ [48000]	11000 [4900]	ND [360]	8600J [610]
Anthracene	ND [390]	NDJ _v [480]	9800J [480]	ND [4900]	ND [360]	ND [24000]
Pyrene	ND [390]	3800J [480]	3300J [480]	4900LJ [4900]	ND [360]	4400J [610]
Chrysene	ND [390]	560J [480]	590J [480]	410LJ [4900]	ND [360]	580LJ [610]
bis(2-Ethylhexyl)phthalate	ND [390]	96000J [19000]	120000J [48000]	290000J [49000]	ND [360]	100000 [24000]
Di-n-octylphthalate	53LJ [390]	51000J [19000]	180000J [48000]	280000J [49000]	47LJ [360]	43000 [24000]
References	Ref. 20, pp.120-121	Ref. 20, pp.126-130	Ref. 20, pp.133-137	Ref. 20, pp.139-143	Ref. 20, pp.146-147	Ref. 20, pp.105-106

Notes: ND = not detected at the laboratory reported quantitation limit.

[SQL] = Sample Quantitation Limit.

L = reported concentration is between the IDL and CRDL.

Shaded and **bold** values indicate detected at or above the highest background value.

J, J[^], J_v = result is estimated (J), with high bias (J[^]) or with low bias (J_v), due to a quality control parameter.

Table 4

Source Samples - Pesticides/PCBs						
Constituents Fg/Kg	SO-04 FGJ26DL Source	SO-05 FGJ27DL Source	SO-06 FGJ28DL Dup of SO-05	SO-07 FGJ29DL Source	SO-08 FGJ30DL Source	SE-10 FGJ22DL Adjacent Pond
4,4'-DDE	ND [39]	NDJ [47]	54J [49]	70J [50]	ND [36]	110J [60]
Endrin	ND [39]	76J [47]	NDJ [49]	ND [50]	ND [36]	ND [60]
4,4'-DDD	ND [39]	NDJ [47]	100J [49]	160J [50]	ND [36]	ND [60]
Methoxychlor	ND [200]	420J [230]	NDJ [250]	ND [260]	ND [180]	ND [310]
References	Ref. 20, p.175	Ref. 20, p.177	Ref. 20, p.179	Ref. 20, p.181	Ref. 20, p.183	Ref. 20, p.167

Notes: ND = not detected at the laboratory reported quantitation limit.

[SQL] = Sample Quantitation Limit.

J = result is estimated due to a quality control parameter.

Shaded and **bold** values indicate detected at or above the highest background value.

Ground water samples were collected from six private ground water wells in the surrounding area to assess the Ground Water Migration Pathway during the April 1999 SSI sampling event at the site. These wells were developed into the Upper Trinity River Quaternary Alluvium Aquifer. The analytical results from these samples (GW-01, GW-02, GW-04, GW-06, GW-07 and GW-08) revealed that organic and/or inorganic analytes were detected above the observed release criteria in five of the private ground water wells (see Appendix D) (Ref. 3, pp.28-29). Four (4) of the 5 wells with samples meeting release criteria (GW-02, GW-04, GW-06, GW-07) are used for drinking water, however, none of the analytes in these wells exceeded EPA primary drinking water standard Maximum Contaminant Levels (MCLs). The fifth well meeting release criteria (GW-01) is used for non-potable purposes only. On January 19, 2000, at the request of TNRCC, the Texas Department of Health (TDH) completed a Health Consultation on the site ground water well sampling data. TDH concluded, based on available data, that no adverse health effects would be expected with exception to the well used for non-potable purposes (GW-01). TDH recommended that the well from which GW-01 was collected not be used for potable purposes unless appropriate treatment technologies are implemented (Ref. 26, p. 9). Sample result letters with the TNRCC and the TDH finds have been mailed to the private well owners.

Sediment samples were collected from the closest perennial surface water body downstream from the site to assess the Surface Water Migration Pathway during the April 1999 SSI sampling event. These samples were collected from fish ponds used as both a commercial and private fishery. The analytical results from

these samples (SE-05 and SE-06) revealed that an inorganic analyte was detected above the observed release criteria (Ref. 3). However, according to the HRS Rule, Section 4.1.3.3, a hazardous substance must have a bioaccumulation potential factor value of 500 or greater and meet the criteria for an observed release for the target fishery to be subject to actual human food chain contamination. The bioaccumulation potential factor value for the inorganic analyte (nickel) detected above the observed release criteria was 0.5 (Ref. 2). Therefore, this fishery is not considered to be subject to actual human food chain contamination.

Releases of hazardous substances to the ground water pathway are the major concern for this site. Hazardous substances have been documented in the surface soils and shallow ground water beneath the site in the Upper Trinity River Quaternary Alluvium aquifer. The Ground Water Pathway is being scored based on actual contamination to area drinking water wells within this aquifer.

Enforcement:

Melton E. Kelly, as owner, was the last known person to actively live on and use the property. Mr. Kelly died on November 14, 1993. It is unknown if any of the ash piles were created before Mr. Kelly's death or if Mr. Kelly participated in creating any of the ash piles later found on the site. The fire reported on February 1, 1994 may have involved only Mr. Kelly's then abandoned house, however, the fire reported on July 16, 1994 is believed to have involved wire burning (Ref. 27, p. 2; Ref. 25, pp.21 and 30). The person(s) responsible for the wire burning activities have not been identified at this time. The enforcement actions for this site were focused on the perceived owner(s) of the property (Ref. 27, p. 2).

On October 6, 1994 a Notice of Violation (NOV) was issued addressed to the estate of Melton Kelly. On November 7, 1994 notice of the Executives Director's Preliminary Report and Petition (EDPRP) was sent to Billy Joe Kelly (brother); Mary Kelly (ex-wife); Melsha Kelly (daughter); and Melton Kelly, Jr. (son) as contact persons for the owner of the property which was then believed to be Mr. Kelly's estate. The EDPRP was seeking penalties and technical enforcement remedies including remediation of the property. On September 25, 1996, the Commission issued its Default Order against the Estate of Melton Kelly assessing \$18,000 in penalties and requiring site remediation (Ref. 27, p. 2).

The Attorney General was requested to enforce the Commission's Order on March 10, 1998. The matter was rejected by the Attorney General on November 19, 1998. The rejection was based on the fact that Melton Kelly's estate was not in existence on or before the date the Commission's Order was issued. Under Texas law, property passes immediately upon the owners death. To whom it passes cannot be determined with certainty until a valid will is produced, a probate court determines that the deceased did not leave a will or that the will is invalid, or four years after the death at which time all title passes by intestate succession since time to probate a will has expired. Ownership of the property relates back to the time of death (Ref. 27, p. 3).

Melton Kelly's will was probated as a muniment of title on January 2, 1997. A muniment of title is a special "cost saving" probate proceeding which asserts that the deceased had no debts other than those against real property and that administration of the estate is unnecessary. The court issues its order validating the will and the proceeding is closed (Ref. 27, p. 3).

The will conveyed the referenced property to Mr. Kelly's children, Melsha and Melton Kelly, Jr. At the

time the ash piles were created, the children lived with their mother, Mary Kelly, in Oakland, California. The children continue to live in California. Since their only known connection to the waste is as heirs, the children are not potentially responsible persons and have no personal liability for the waste under Tex. Health & Safety Code § 361.275(e)2(D) (Ref. 27, p. 3).

On October 16, 2000, the TNRCC Litigation and Enforcement Division referred the site to the Remediation Division, Superfund Program, for appropriate action. Litigation and Enforcement Division staff evaluated this site and determined that enforcement is no longer an effective option for addressing the contamination which exists at the site. The responsible party is either deceased or unknown and the current owners share a strong “inherited land” defense (Ref. 27, p. 4).

Figure 2

REFERENCES

- | <u>Reference Number</u> | <u>Description of the Reference</u> |
|-------------------------|---|
| 1. | U.S. Environmental Protection Agency, 40CFR Part 300, <i>Hazard Ranking System</i> , Appendix A, 55 FR 51583, December, 1990. |
| 2. | U.S. Environmental Protection Agency, <i>Superfund Chemical Data Matrix (SCDM)</i> . June, 1996. |
| 3. | U.S. Environmental Protection Agency, <i>Screening Site Inspection Report - Melton Kelly Property Site</i> , Chatfield, Navarro County, Texas. August 1999. 52 pages. |
| 4. | U.S. Environmental Protection Agency. <i>Pre-CERCLIS Screening Checklist for Melton Kelly Property Site, Chatfield, Navarro County, Texas</i> . CERCLIS #TX0 000 852 111, November 1998. 25 pages. |
| 5. | Thompson, Gerald L., United States Geological Survey, Texas Water Development Board. <i>Ground-Water Resources of Navarro County, Texas</i> . Report 160, Nov 1972, reprinted Jan 1987. 16 pages. |
| 6. | (Reserved) |
| 7. | (Reserved) |
| 8. | U. S. Department of Agriculture, Soil Conservation Service. <i>Soil Survey of Navarro County, Texas</i> , Series 1960-67, based on 1968 data. December 1974. 8 pages. |
| 9. | Texas Natural Resource Conservation Commission, <i>The State of Texas Water Quality Inventory, 12th Edition, 1994, Volume 1, Surface and Ground Water Assessment and TNRCC Water Quality Management Programs</i> , SFR-11. Nov 1994. 283 pages. |
| 10. | Taylor, Howard D., Geologist and Staff, Texas Water Development Board. <i>Water-Level and Water-Quality Data From Observation Wells in Northeast Texas</i> , Report 198. February 1976. 4 pages. |
| 11. | North Central Texas Council of Governments, Department of Environmental Resources. <i>Ground Water Protection Program Participants in North Central Texas</i> . 1:1,000,000 DLG Data Files, Texas State Plane Coordination System, North Central Zone Wellhead Protection Area. 1 page. |

REFERENCES (continued)

<u>Reference Number</u>	<u>Description of the Reference</u>
12.	Federal Insurance Administration, U. S. Department of Housing and Urban Development. Navarro County, Texas, Community-Panel No. 480950 0002 A. <i>Flood Hazard Boundary Map</i> . December 27, 1977. 1 page.
13.	(Reserved)
14.	U. S. Department of the Interior, Fish and Wildlife Service, Styx Texas Quadrangle, Navarro County, 7.5 Minute Series (Topographic). <u>National Wetlands Inventory Map</u> . 1989. 1 page.
15.	U.S. Environmental Protection Agency. <i>Preliminary Assessment/Screening Site Inspection Work Plan for Melton Kelly Property Site</i> . TX0 000 852 111, Chatfield, Navarro County, Texas. April 1999. 40 pages.
16.	(Reserved)
17.	(Reserved)
18.	U.S. Environmental Protection Agency. Screening Site Inspection Field Log Book notes and photographs. April 12 - 15, 1999. 46 pages.
19.	U.S. Environmental Protection Agency, Region 6, Houston Branch. <i>Case Number 26913, Sample Designation Group JFG06, CLP Data Review and Organic Water Sample Analysis Data Package</i> . From: Marvelyn Humphrey, Alternate ESAT RPO, 6MD-HC, To: B. Rhotenberry, 6SF-RA. May 12, 1999. 78 pages.
20.	U.S. Environmental Protection Agency, Region 6, Houston Branch. <i>Case Number 26913, Sample Designation Group FGA79, CLP Data Review and Organic Soil Sample Analysis Data Package</i> . From: Marvelyn Humphrey, Alternate ESAT RPO, 6MD-HC, To: B. Rhotenberry, 6SF-RA. May 25, 1999. 185 pages.
21.	U.S. Environmental Protection Agency, Region 6, Houston Branch. <i>Case Number 26913, Sample Designation Group MFJN83, CLP Data Review and Inorganic Water Sample Analysis Data Package</i> . From: Marvelyn Humphrey, Alternate ESAT RPO, 6MD-HC, To: B. Rhotenberry, 6SF-RA. May 10, 1999. 20 pages.

REFERENCES (continued)

- | <u>Reference Number</u> | <u>Description of the Reference</u> |
|-------------------------|--|
| 22. | U.S. Environmental Protection Agency, Region 6, Houston Branch. <i>Case Number 26913, Sample Designation Group MFGH87, CLP Data Review and Inorganic Soil Sample Analysis Data Package</i> . From: Marvelyn Humphrey, Alternate ESAT RPO, 6MD-HC, To: B. Rhotenberry, 6SF-RA. May 17, 1999. 32 pages. |
| 23. | U.S. Environmental Protection Agency, Region 6, Houston Branch, and Texas Natural Resource Conservation Commission, Quality Assurance/Quality Control Review, <i>Analytical Data Assessment Checklist of CLP Data Packages and Case Number 26906, Sample Designation Group MFJN89 and FGJ12, Decontamination Event #18 Data Assessment</i> . March 1999. 11 pages. |
| 24. | Thompson, J. D., Texas Natural Resource Conservation Commission, Region 4 Office, Arlington, Texas. Telephone Memo to The File with Peggy Austin, Co-Owner, Pettigrew Ranch, Subject: "Annual Fish Production." July 13, 1999. 1 page. |
| 25. | Texas Natural Resource Conservation Commission. <i>TNRCC Industrial & Hazardous Waste Inspection Report for Non-Permitted Facilities</i> . August 31, 1994. 34 pages. |
| 26. | Texas Department of Health. <i>Health Consultation for Melton Kelly Property Site, Chatfield, Navarro County, Texas</i> . January 19, 2000. 13 pages. |
| 27. | Texas Natural Resource Conservation Commission. Memorandum To: Glenda Champagne, Section Manager, Site Assessment and Management Section, From: Thomas Greimel, Enforcement Coordinator, Enforcement Division. October 16, 2000. 4 pages. |

WORKSHEET FOR COMPUTING HRS SITE SCORE

	<u>S</u>	<u>S²</u>
1. Ground Water Migration Pathway Score (S_{gw}) (from Table 3-1, line 13)	<u>13.49</u>	<u>181.98</u>
2a. Surface Water Overland/Flood Migration Component (from Table 4-1, line 30)		<u>NE</u>
2b. Ground Water to Surface Water Migration Component (from Table 4-25, line 28)		<u>NE</u>
2c. Surface Water Migration Pathway Score (S_{sw}) Enter the larger of lines 2a and 2b as the pathway score.		<u>NE</u>
3. Soil Exposure Pathway Score (S_s) (from Table 5-1, line 22)		<u>NE</u>
4. Air Migration Pathway Score (S_a) (from Table 6-1, line 12)		<u>NE</u>
5. Total of $S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2$		<u>181.98</u>
6. HRS Site Score Divide the value on line 5 by 4 and take the square root.		<u>6.74</u>

GROUND WATER MIGRATION PATHWAY SCORESHEET
Upper Trinity River Quaternary Alluvium Aquifer

<u>Factor Categories and Factors</u>	<u>Maximum Value</u>	<u>Value Assigned</u>
<u>Likelihood of Release to an Aquifer</u>		
1. Observed Release <i>(Ref. 3, pp. 28-29; Attachment D)</i>	550	<u>550</u>
2. Potential to Release <i>(Not Evaluated)</i>		
2a. Containment	10	—
2b. Net Precipitation	10	—
2c. Depth to Aquifer	5	—
2d. Travel Time	35	—
2e. Potential to Release (Lines 2a(2b + 2c + 2d))	500	—
3. Likelihood of Release <i>(Higher of Line 1 and 2e)</i>	550	<u>550</u>
<u>Waste Characteristics</u>		
4. Toxicity/Mobility <i>(Ref. 1, Sect. 3.2.1.2; Chromium, Lead and Manganese, Ref. 3, pp. 15, 19, 22 and 30)</i>	*	<u>10,000</u>
5. Hazardous Waste Quantity <i>(Ref. 1 Tables 2-6; Ref. 3, p. 31)</i>	*	<u>100</u>
6. Waste Characteristics <i>(Ref. 1, Table 2-7)</i>	100	<u>32</u>
<u>Targets</u>		
7. Nearest Well <i>(Ref. 3, p. 31; Ref. 1, Sect. 3.3.1)</i>	50	<u>45</u>
8. Population:		
8a. Level I Concentrations	**	<u>0</u>
8b. Level II Concentrations <i>(Ref. 1, Sect.3.3.2.3; Ref. 3, pp. 31-35; Attachment D)</i>	**	<u>13</u>
8c. Potential Contamination <i>(Ref. 1, Sect.3.3.2.4; Ref. 3; Attachment D)</i>	**	<u>.25</u>
8d. Population (Lines 8a + 8b + 8c)	**	<u>13.25</u>
9. Resources	5	<u>5</u>
10. Wellhead Protection Area	20	<u>0</u>
11. Targets (Lines 7 + 8d + 9 + 10)	**	<u>63.25</u>

* Maximum value applies to waste characteristics category.

** Maximum value not applicable.

GROUND WATER MIGRATION PATHWAY SCORESHEET - (Continued)
Upper Trinity River Quaternary Alluvium Aquifer

<u>Ground Water Migration Score for an Aquifer</u>	<u>Maximum Value</u>	<u>Value Assigned</u>
12. Aquifer Score ((Lines 3 x 6 x 11)/82,500)***	100	<u>13.49</u>
<u>Ground Water Migration Pathway Score</u>		
13. Pathway Score (S_{gw}), (Highest value from Line 12 for all aquifers evaluated)***	100	<u>13.49</u>

*** Do not round to nearest integer.