

The following is an Adobe Acrobat reproduction of the official

HRS DOCUMENTATION RECORD

for

McNabb Flying Service

Brazoria County, Texas

No graphics illustrations or copies of documents cited as references in the determination of the HRS score are included with this electronic version, but graphics are available with the print versions as part of the McNabb Flying Service repository records

at

Alvin Branch Library
105 South Gordon Street
Alvin, Texas

and/or

TNRCC Records Management Center
Austin, Texas

August 1999

Scroll Down to View



Protecting Texas
by Reducing and
Preventing Pollution

HRS DOCUMENTATION RECORD

VOLUME I OF I

for

McNabb Flying Service

Brazoria County

TXD981048333

SWR # 81818

Prepared by:

Texas Natural Resource Conservation Commission

Austin, Texas

August 1999

Hazard Ranking System
Documentation Record

McNabb Flying Service
Alvin, Brazoria County, Texas
EPA ID # TXD981048333
TNRCC SWR # 81818

Prepared by

Texas Natural Resource Conservation Commission
Site Evaluation/Restoration/Remediation Section
Superfund Site Discovery & Assessment Program Staff
Austin, Texas

August, 1999

HRS DOCUMENTATION RECORD

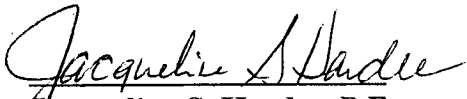
McNabb Flying Service

Brazoria County, Texas

EPA ID # TXD981048333

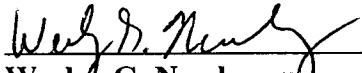
SWR # 81818

SIGNATURE PAGE


Jacqueline S. Hardee, P.E.

Texas Natural Resource Conservation Commission
Site Evaluation/Restoration/Remediation Section
Section Manager

8/23/99
Date


Wesley G. Newberry

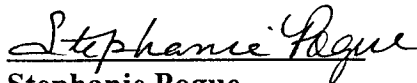
Texas Natural Resource Conservation Commission
Superfund Site Discovery & Assessment Program
Team Leader

8-6-99
Date


Marshall A. Cedilote

Texas Natural Resource Conservation Commission
Superfund Site Discovery & Assessment Program
Project Manager

7/26/99
Date


Stephanie Pogue

Texas Natural Resource Conservation Commission
Superfund Site Discovery & Assessment Program
QA/QC Officer

8/5/99
Date

CONTENTS

| | |
|---|----|
| References | 1 |
| HRS Documentation Record - Review Cover Sheet | 3 |
| Site Summary | 4 |
| Site Scoring Summary | 8 |
| Worksheet for Computing HRS Site Score | 9 |
| Ground Water Migration Pathway Scoresheet | 10 |
| Soil Exposure Pathway Scoresheet | 11 |
| | |
| 2.2 Source Characterization: Source 1 | 13 |
| 2.2.1 Source Identification | 13 |
| 2.2.2 Hazardous Substances Associated with a Source | 14 |
| 2.2.3 Hazardous Substances Available to a Pathway | 14 |
| 2.3 Likelihood of Release | 14 |
| 2.4 Waste Characteristics | 14 |
| 2.4.1 Selection of Substance Potentially Posing Greatest Threat | 15 |
| 2.4.2 Hazardous Waste Quantity | 15 |
| 2.4.2.1 Hazardous Waste Quantity | 15 |
| 2.4.2.1.1 Hazardous Constituent Quantity | 15 |
| 2.4.2.1.2 Hazardous Wastestream Quantity | 15 |
| 2.4.2.1.3 Volume | 15 |
| 2.4.2.1.4 Area | 15 |
| 2.4.2.1.5 Calculation of Source Hazardous Waste Quantity Value | 16 |
| | |
| 2.2 Source Characterization: Source 2 | 17 |
| 2.2.1 Source Identification | 17 |
| 2.2.2 Hazardous Substances Associated with a Source | 18 |
| 2.2.3 Hazardous Substances Available to a Pathway | 21 |
| 2.3 * Likelihood of Release | 22 |
| 2.4 Waste Characteristics | 22 |
| 2.4.1 Selection of Substance Potentially Posing Greatest Threat | 22 |
| 2.4.2 Hazardous Waste Quantity | 22 |
| 2.4.2.1 Hazardous Waste Quantity | 22 |
| 2.4.2.1.1 Hazardous Constituent Quantity | 22 |
| 2.4.2.1.2 Hazardous Wastestream Quantity | 22 |
| 2.4.2.1.3 Volume | 23 |
| 2.4.2.1.4 Area | 23 |
| 2.4.2.1.5 Calculation of Source Hazardous Waste Quantity Value | 23 |
| | |
| 2.4.3 Waste Characteristics Factor Value | 24 |
| 2.4.3.1 Factor Category Value | 24 |

CONTENTS

| | | |
|-----------------------------|--|----|
| Sources Not Evaluated | 26 | |
| 3.0 | Ground Water Migration Pathway | 27 |
| 3.0.1 | General Considerations | 27 |
| 3.0.1.1 | Ground Water Target Distance Limit | 27 |
| 3.0.1.2.1 | Aquifer Interconnections | 29 |
| 3.1 | Likelihood of Release | 29 |
| 3.1.1 | Observed Release | 29 |
| 3.1.2 | Containment | 29 |
| 3.1.2.2 | Net Precipitation | 29 |
| 3.1.2.3 | Depth to Aquifer | 29 |
| 3.1.2.4 | Travel Time | 30 |
| 3.1.2.5 | Calculation of Potential to Release Factor Value | 30 |
| 3.1.3 | Calculation of Likelihood of Release Factor Category Value | 30 |
| 3.2 | Waste Characteristics | 30 |
| 3.2.1 | Toxicity/Mobility | 30 |
| 3.2.2 | Hazardous Waste Quantity | 30 |
| 3.2.3 | Calculation of Waste Characteristics Factor Category Value | 31 |
| 3.3 | Targets | 31 |
| 3.3.1 | Nearest Well | 31 |
| 3.3.2 | Population | 31 |
| 3.3.2.1 | Level of Contamination | 31 |
| 3.3.2.2 | Level I Concentrations | 31 |
| 3.3.2.3 | Level II Concentrations | 31 |
| 3.3.2.4 | Potential Contamination | 32 |
| 3.3.2.5 | Calculation of Population Factor Value | 33 |
| 3.3.3 | Resources | 33 |
| 3.3.4 | Wellhead Protection Area | 33 |
| 3.3.5 | * Calculation of Targets Factor Category Value | 33 |
| 3.4 | Ground Water Migration Pathway Score for an Aquifer | 34 |
| 3.5 | Calculation of Ground Water Migration Pathway Score | 34 |
| 4.0 | Surface Water Pathway | 35 |
| 5.0 | Soil Exposure Pathway | 36 |
| 5.1 | Resident Population Threat | 36 |
| 5.1.1 | Likelihood of Release | 36 |
| 5.1.2 | Waste Characteristics | 36 |
| 5.1.2.1 | Toxicity | 36 |
| 5.1.2.2 | Hazardous Waste Quantity | 36 |
| 5.1.2.3 | Calculation of Waste Characteristics Factor Category Value | 36 |

CONTENTS

| | | |
|-----------|--|----|
| 5.1.3 | Targets | 37 |
| 5.1.3.1 | Resident Individual | 37 |
| 5.1.3.2 | Resident Population | 37 |
| 5.1.3.2.1 | Level I Concentrations | 37 |
| 5.1.3.2.2 | Level II Concentrations | 37 |
| 5.1.3.2.3 | Calculation of Resident Population Factor Value | 37 |
| 5.1.3.3 | Workers | 37 |
| 5.1.3.4 | Resources | 38 |
| 5.1.3.5 | Terrestrial Sensitive Environments | 38 |
| 5.1.3.6 | Calculation of Resident Population Factor Category Value | 38 |
| 5.1.4 | Calculation of Resident Population Threat Score | 38 |
| 5.2 | Nearby Population Threat | 38 |
| 5.3 | Calculation of Soil Exposure Pathway Score | 39 |
| 6.0 | Air Migration Pathway | 40 |

TABLES

| | | |
|----|--|----|
| 1. | Source Characterization for Source 2 | 18 |
| 2. | Background Concentrations for use with Soil Samples | 20 |
| 3. | Ground Water Migration Pathway Waste Characteristics Factor Category Value | 24 |
| 4. | Soil Exposure Pathway Waste Characteristics Factor Category Value | 25 |
| 5. | Population around the MFS Site | 32 |

FIGURES

| | | |
|----|---|----|
| 1. | Site Location Map | 6 |
| 2. | Site Features Map | 7 |
| 3. | Stratigraphic and Hydrogeologic Units Underlying the MFS Site | 28 |

APPENDICES

| | |
|---|-------------------------|
| I | Chronology of Documents |
|---|-------------------------|

REFERENCES

- | <u>Reference Number</u> | <u>Description of Reference</u> |
|-------------------------|---|
| 1. | 30 TAC Chapter 335, Subchapter K, Section 335.342, Definitions: U.S. Environmental Protection Agency (USEPA), 40 CFR, Part 300, Hazard Ranking System, Appendix A, Volume 55, Federal Register 51532-51667. December 14, 1990. |
| 2. | USEPA, Superfund Chemical Data Matrix (SCDM). June 1996. |
| 3. | USEPA, Hazard Ranking System Guidance Manual, OSWER Directive 9345.1-07. November 1992. |
| 4. | U.S. Geological Survey. Manvel, Texas 7.5 Minute Topographic Quadrangle. |
| 5. | Brazoria County Deed Records. 4 pages. |
| 6. | USEPA, Potential Hazardous Waste Site Inspection Report. Lisa Arceneaux, Engineering Science, Inc. July 8, 1987. 27 pages. |
| 7. | USEPA, Potential Hazardous Waste Site Identification. Robert Chapin. October 26, 1984. 1 page. |
| 8. | USEPA, Potential Hazardous Waste Site Identification and Preliminary Assessment. Charles E. Lanford, Jr. February 3, 1985. 9 pages. |
| 9. | USEPA, Potential Hazardous Waste Site Tentative Disposition. G.W. Guerra. December 24, 1985. 1 page. |
| 10. | USEPA, Superfund Site Strategy Recommendation. Debra Vaughn-Wright. September 27, 1988. 1 page. |
| 11. | Texas Natural Resource Conservation Commission (TNRCC), Superfund Site Discovery and Eligibility Determination Checklist and Interoffice Memorandum. From: Steve Hamm, Superfund Coordinator, Region 12 - Houston. To: Ben Wesley, Industrial and Hazardous Waste Liaison. February 22, 1994. 24 pages. |
| 12. | TNRCC Interoffice Memorandum. From: John Murphy, Enforcement Coordinator, Industrial and Hazardous Waste Enforcement Section. To: Stennie Meadours, Manager, Emergency Response and Assessment Section. June 28, 1994. 4 pages. |

**Reference
Number**

Description of Reference

13. TNRCC State Superfund Candidate Site Eligibility/Status Sheet and Preliminary Hazard Assessment. Diane Poteet. August 15, 1994. 19 pages.
14. TNRCC Interoffice Memorandum. From: Daniel Benson, Superfund Site Discovery and Assessment Team. To: Stennie A. Meadours, Manager, Emergency Response and Assessment Section. August 22, 1997.
15. TNRCC, Quality Control (QC) Data Assessment for McNabb Flying Service State HRS Record. August 1977. 2 pages.
16. Texas Department of Water Resources, Stratigraphic and Hydrogeologic Framework of Part of the Coastal Plain of Texas. July 1979. 43 pages.
17. Texas Water Development Board, Ground Water Resources of Brazoria County, Texas. Report 163. February 1973. 205 pages.
18. Texas Department of Water Resources, Digital Models for Simulation of Ground Water Hydrology of the Chicot and Evangeline Aquifers along the Gulf Coast of Texas. Report 289. May 1985. 101 pages.
19. Texas Department of Water Resources, Climatic Atlas of Texas. December 1983. 151 pages.
20. Texas Department of Water Resources, Water Well Report. May 21, 1982. 1 page.
21. TNRCC, Public Water Supply Well Report. June 23, 1998. 24 pages.

HRS DOCUMENTATION RECORD-REVIEW COVER SHEET

NAME OF SITE: McNabb Flying Service

AKAs: None

CONTACT PERSON & PHONE NUMBER: Marshall Cedilote, TNRCC (512) 239-4134

CURRENT SITE OWNER/OPERATOR: Mrs. Esther McNabb
P.O. Box 25
Manvel, Texas 77578

STREET ADDRESS: 1.5 miles northwest of the City of Alvin, approximately 1 mile east of State Highway 6, at the intersection of Brazoria County Roads 146 and 539.

CITY: Alvin
COUNTY: Brazoria
STATE: Texas

LATITUDE: 29° 27' 8" N
LONGITUDE: 95° 17' 30" W

EPA ID# TXD981048333

TNRCC SWR# 81818

TNRCC REGION 12

SITE SUMMARY

GENERAL DESCRIPTION OF THE SITE

The McNabb Flying Service (MFS) site is a residential and primarily undeveloped piece of property located approximately 1.5 miles northwest of the City of Alvin, 1 mile northeast of State Highway 6 at the intersection of Brazoria County Roads 146 and 539. The site is located at Latitude 29° 27' 8" N and Longitude 95° 17' 30" W (Ref. 4). A Site Location Map is provided as Figure 1.

The present owner of the site is Mrs. Esther McNabb (Ref. 5, pp. 1-4).

BACKGROUND AND OPERATING HISTORY

Little is known about the historical operations and waste management practices at the MFS site. Activity at the site began when Esther McNabb's husband, Joel McNabb, opened a flying school (exact date unknown); no pesticides were applied or stored at the site during this time (Ref. 6, p.11). Esther and Joel's stepson, Frank McNabb, was the first to use the site as a base for an aerial pesticide applicator, although the exact dates of his activities are unknown (Ref. 6, p. 11). Frank's son, Toby McNabb, used the site for approximately one year after Frank left the business and applied primarily fertilizer (Ref. 6, p. 11). The exact dates of Toby's activities at the site are unknown. MFS had been inactive for at least ten years when the U.S. Environmental Protection Agency (EPA) and the Texas Water Commission (TWC) began their site investigations.

The MFS site was identified as a potential hazardous waste site by the EPA on 10/20/84 from Texas Department of Agriculture files (Ref. 7, p. 1). A Preliminary Assessment was conducted at the MFS site on January 10, 1985. At that time the site was inactive and containers were observed in the hangars (Ref. 8, p. 5). The following information was obtained during an interview with Mr. Justin K. Davis, former chief pilot for McNabb Flying Service: No mixing of pesticides was done at the MFS site and all empty pesticide containers were returned to the farmer; all rinsate from pesticide containers were added to the aircraft; all application equipment was rinsed out with the last load; pump and spray booms were triple rinsed and the rinsate applied to the same field; no disposal of empty pesticide containers took place at the MFS site (Ref. 8, p. 5).

In a 1987 Tentative Disposition, the EPA recommended further investigation at the MFS site due to the types of chemicals present and the lack of information about site operations (Ref. 9, p. 1). A Site Inspection was performed at the MFS site in 1987. A soil sample collected in the drainage pathway from the operations area showed low levels of methyl parathion and ethyl parathion (0.013 and 0.065 mg/Kg, respectively) and toxaphene at 325 mg/Kg (Ref. 6, p.22). A sample collected from the McNabb ground water well used for drinking water, showed no contamination by pesticides (Ref. 6, p. 21). The EPA issued a Superfund Site Strategy Recommendation in 1988 that no further

remedial action was planned, however the site should be evaluated for a removal action (Ref. 10, p. 1). The MFS site was referred to the Texas Water Commission on September 27, 1988.

On October 8, 1993 TNRCC Region 12 personnel conducted a Superfund Site Discovery Inspection at the MFS site. In hangar #1 there was 1 55-gallon drum of methanol, 1 55-gallon drum of toluene, 1 55-gallon drum of acetone and 4 55-gallon drums of methylene chloride. In hangar #2 there was 1 partially full 55-gallon drum of the herbicide Stam-M4, 2 partially full 55-gallon drums of unknown liquids, 1 4-gallon metal container of toxaphene, 1 4-gallon metal container of methyl parathion, 4 2.5-gallon metal containers of Windfall Adjuvent and triphenyltin hydroxide as well as many empty, badly corroded pesticide and herbicide containers. A drum adjacent to water well #3 had 1 55-gallon drum of Stam-M4 and 2 55-gallon drums (one plastic, one metal) with unknown contents. The metal drum was documented to be leaking (Ref. 11, p. 2). A soil sample collected in hangar #1 showed a toxaphene concentration of 77.2 mg/Kg (Ref. 11, pp. 7, 11, 15). A soil sample collected outside hangar #2 showed a toxaphene concentration of 63.5 mg/Kg (Ref. 11, pp. 7, 12, 16). Based on these results, an NOV was sent to Ms. McNabb on 1/11/94 (Ref. 11, pp. 7, 21-22). A response to the NOV was received on 2/16/94, describing Ms. McNabb's inability to address the violations (Ref. 11, pp. 7, 23).

The MFS site was referred to the Pollution Cleanup Division on April 7, 1994 for appropriate action (Ref. 12, p. 1, 3). A State Superfund Candidate Site Eligibility/Status Sheet was completed on August 15, 1994 in which the MFS site was determined to be an eligible inactive facility (Ref. 13, p. 1).

On April 30, 1997, TNRCC personnel conducted an onsite sampling investigation at the McNabb Flying Service to obtain soil and drinking water samples to support the requirements for scoring the site. Approximately 90 drums, cans, containers, and bottles or jugs were located throughout Hangar No. 2. Five soil samples were collected during the site investigation; analysis indicated the presence of toxaphene and cadmium. Approximately 1,500 square feet of soil are impacted as a result of this contamination (Ref. 14, pp. 001-002).

*

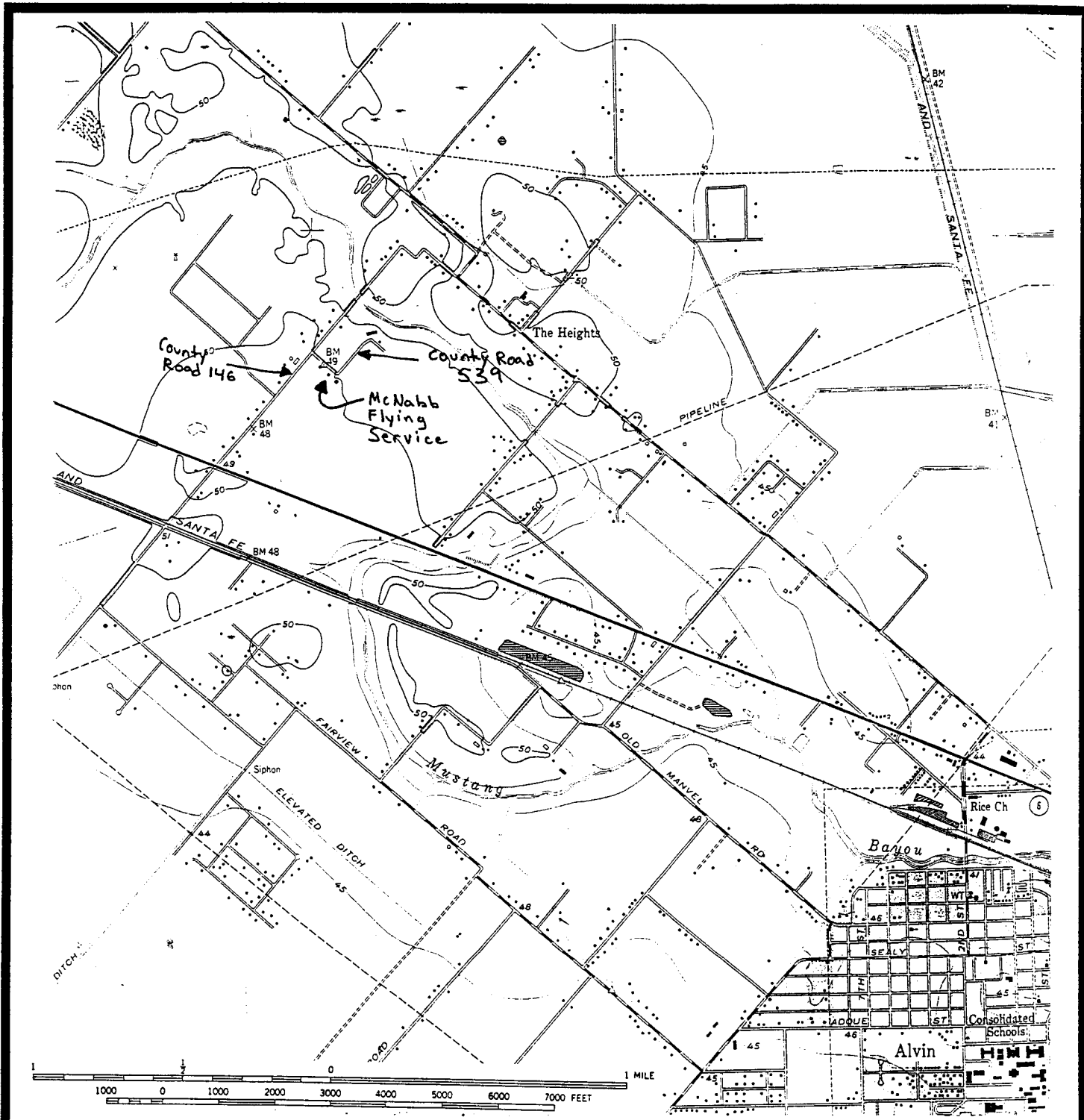
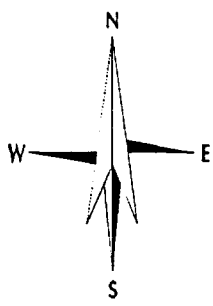


FIGURE 1: Site Location Map

**McNabb Flying Service
TXD981048333**

Alvin, Brazoria County, Texas



Golf Course

McNABB RESIDENCE

Water Well No. 1 (NOT IN USE)

Concrete Slab

SAMPLED - TNRC (5/97)

Water Well No. 2 (ACTIVE)

Water Well No. 3 (NOT IN USE)

OFFICE AREA

Hanger No. 1
AIRMOBILE'S LUMBER, HAY, WOODS, MACHINERY, EQUIPMENT

UST No. 3 SUSPECTED

SUSPECTED UST No. 1

UST No. 2 (SUSPECTED LOCATION)

COIL SERVICE TURRET 1983 1500 lbs capacity

Hanger No. 3
TRACTOR AUTOMOBILE (MAINLY EMPTY)

Septic Tank

SO-5 BACK-GROUND

Airstrip

County Road 146

To HWY 6 →

County Road 539



Figure 2

Site Features Map

McNabb Flying Service

TXD981048333

Alvin, Brazoria County, Texas

SITE SCORING SUMMARY

PATHWAYS, COMPONENTS OR THREATS NOT EVALUATED:

Surface Water Pathway

The Surface Water Pathway was not scored due to the lack of perennially flowing surface water within 2 miles of the site.

Soil Exposure Pathway - Nearby Population Threat

The Soil Exposure Pathway Nearby Population Threat was not scored due to its lack of impact on the site score.

Air Migration Pathway

The Air Migration Pathway was not scored due to the lack of an observed release.

SCORES

| | | |
|--|---|--------------|
| Ground Water Pathway (Potential Contamination) | = | 13.89 |
| Surface Water Pathway | = | NS |
| Soil Exposure Pathway (Residential Population Threat) | = | 9.00 |
| Air Migration Pathway | = | NS |

HRS Site Score = 8.27

NS = Not Scored

NOTES TO READER

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

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) | 13.89 | 192.93 |
| 2a. Surface Water Overland/Flood Migration Component (from Table 4-1, line 30) | NS | NS |
| 2b. Ground Water to Surface Water Migration Component (from Table 4-25, line 28) | NS | NS |
| 2c. Surface Water Migration Pathway Score (S_{sw}) Enter the larger of lines 2a and 2b as the pathway score. | NS | NS |
| 3. Soil Exposure Pathway Score (S_s) (from Table 5-1, line 22) | 9.00 | 81.00 |
| 4. Air Migration Pathway Score (S_a) (from Table 6-1, line 12) | NS | NS |
| 5. Total of $S_{gw}^2 + S_{sw}^2 + S_s^2 + S_a^2$ | 273.93 | |
| 6. HRS Site Score Divide the value on line 5 by 4 and take the square root. | 8.27 | |

GROUND WATER MIGRATION PATHWAY SCORESHEET

| <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 | 550 | NS |
| 2. Potential to Release | | |
| 2a. Containment | 10 | 10 |
| 2b. Net Precipitation | 10 | 10 |
| 2c. Depth to Aquifer | 5 | 5 |
| 2d. Travel Time | 35 | 5 |
| 2e. Potential to Release (Lines 2a(2b + 2c + 2d)) | 500 | 200 |
| 3. Likelihood of Release (Higher of Line 1 and 2e) | 500 | 200 |
| <u>Waste Characteristics</u> | | |
| 4. Toxicity/Mobility | * | 2000 |
| 5. Hazardous Waste Quantity | * | 10 |
| 6. Waste Characteristics | 100 | 18 |
| <u>Targets</u> | | |
| 7. Nearest Well | 50 | 20 |
| 8. Population: | | |
| 8a. Level I Concentrations | ** | NS |
| 8b. Level II Concentrations | ** | NS |
| 8c. Potential Contamination | ** | 288.5 |
| 8d. * Population (Lines 8a + 8b + 8c) | ** | 288.5 |
| 9. Resources | 5 | 5 |
| 10. Wellhead Protection Area | 20 | 5 |
| 11. Targets (Lines 7 + 8d + 9 + 10) | ** | 318.5 |
| <u>Ground Water Migration Score for an Aquifer</u> | | |
| 12. Aquifer Score ((Lines 3 x 6 x 11)/82,500)*** | 100 | 13.89 |
| <u>GROUND WATER MIGRATION PATHWAY SCORE</u> | | |
| 13. Pathway Score (S_{gw}), (Highest value from Line 12 for all aquifers evaluated)*** | 100 | 13.89 |

SOIL EXPOSURE PATHWAY SCORESHEET

Factor Categories and Factors

RESIDENT POPULATION THREAT

| <u>Likelihood of Release to an Aquifer</u> | <u>Maximum Value</u> | <u>Value Assigned</u> |
|---|----------------------|-----------------------|
| 1. Likelihood of Exposure | 550 | 550 |
| <u>Waste Characteristics</u> | | |
| 2. Toxicity | * | 10,000 |
| 3. Hazardous Waste Quantity | * | 10 |
| 4. Waste Characteristics | 100 | 18 |
| <u>Targets</u> | | |
| 5. Resident Individual | 50 | 50 |
| 6. Resident Population: | | |
| 6a. Level I Concentrations | ** | 10 |
| 6b. Level II Concentrations | ** | NS |
| 6c. Resident Population (Lines 6a + 6b) | ** | 10 |
| 7. Workers | 15 | 5 |
| 8. Resources | 5 | NS |
| 9. Terrestrial Sensitive Environments | *** | NS |
| 10. Targets (Lines 5 + 6c + 7 + 8 + 9) | ** | 75 |
| <u>Resident Population Threat Score</u> | | |
| 11. Resident Population Threat (Lines 1 x 4 x 10) | ** | 742,500 |
| <u>NEARBY POPULATION THREAT</u> | | |
| <u>Likelihood of Exposure</u> | | |
| 12. Attractiveness/Accessibility | 100 | NS |
| 13. Area of Contamination | 100 | NS |
| 14. Likelihood of Exposure | 500 | NS |

- * Maximum value applies to waste characteristics category
- ** Maximum value not applicable
- *** No specific maximum value applies to factor. However, pathway score based solely on terrestrial sensitive environments is limited maximum of 60
- **** Do not round to the nearest integer

NS = Not Scored

SOIL EXPOSURE PATHWAY SCORESHEET

NEARBY POPULATION THREAT (Concluded)

Factor Categories and Factors

| <u>Waste Characteristics</u> | <u>Maximum Value</u> | <u>Value Assigned</u> |
|--|----------------------|-----------------------|
| 15. Toxicity | * | NS |
| 16. Hazardous Waste Quantity | * | NS |
| 17. Waste Characteristics | 100 | NS |
| <u>Targets</u> | | |
| 18. Nearby Individual | 1 | NS |
| 19. Population Within 1-Mile | ** | NS |
| 20. Targets (Lines 18 + 19) | ** | NS |
| <u>Nearby Population Threat Score</u> | | |
| 21. Nearby Population Threat (Lines 14 x 17 x 20) | ** | NS |
| <u>SOIL EXPOSURE PATHWAY SCORE</u> | | |
| 22. Soil Exposure Pathway Score *** (S ₃)(Lines 11 + 21)/82,500, subject to a maximum of 100) | 100 | 9.00 |

* Maximum value applies to waste characteristics category

** Maximum value not applicable

*** No specific maximum value applies to factor. However, pathway score based solely on terrestrial sensitive environments is limited maximum of 60

**** Do not round to the nearest integer

NS = Not Scored

*