TCEQ Interoffice Memorandum

То:	Tony Walker, Region 4 Director Jeff Tate, Region 4 Assistant Director Alyssa Taylor, Region 4 Air Section Manager Randy Ammons, North Central and West Texas Area Director
From:	Gulan Sun, Ph.D. Gr S. Toxicology Division, Chief Engineer's Office
Date:	August 29, 2011
Subject:	Health Effects Review of 2010 Ambient Air Network Monitoring Data Region 4, Dallas/Fort Worth

Conclusions

• All hourly average concentrations of volatile organic compounds (VOCs) reported at Texas Commission on Environmental Quality (TCEQ) Region 4-Dallas/Fort Worth 1-hour automated gas chromatograph (autoGC) monitoring sites were below their short-term air monitoring comparison values (AMCVs) and would not be expected to cause short-term adverse health effects, vegetation effects, or odor concerns.

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- All annual average concentrations of VOCs and carbonyls were below their respective TCEQ long-term AMCVs and would not be expected to cause chronic adverse health effects or vegetation effects.
- Except for nickel and lead, annual average concentrations of all the other 13 speciated metals were less than their respective TCEQ long-term AMCVs and would not be expected to cause chronic adverse health effects.
- At the Dallas-Morrell monitoring site, the annual average concentration of nickel, $0.13\mu g/m^3$, reported as total suspended particulate (TSP) as well as the rolling 7-month average concentration of nickel, $0.068 \mu g/m^3$, reported as particulate matter less than 10 µm in size (PM₁₀) from September 17, 2010 to March 28, 2011, exceeded the long-term AMCV of $0.059 \mu g/m^3$ for respirable carcinogenic forms of nickel (i.e., PM₁₀). However, exceedances of the long-term nickel AMCV at Dallas-Morrell site do not necessarily mean that chronic adverse effects will occur. Because:
 - Comparing concentrations of primarily metallic nickel (i.e. noncarcinogenic form of nickel) emitted by Dal Chrome, Inc. to the long-term AMCV for carcinogenic forms of nickel is likely over conservative. Both the annual average nickel TSP concentration of 0.13 μg/m³ and the rolling 7-month average nickel PM₁₀ concentration of 0.068 μg/m³ are below the noncarcinogenic chronic AMCV of 0.23 μg/m³.
 - > In addition, results from a special monitoring study of the more toxicologically relevant nickel PM fraction (i.e. particulate matter less than 2.5 μ m or PM_{2.5}) indicated that the average reported nickel PM_{2.5} concentration of 0.010 μ g/m³, collected at the Dallas-Morrell site from April 1, 2009 to August 6, 2010, was below the long-term AMCV of

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 $0.059 \ \mu g/m^3$. The estimated annual average nickel PM_{2.5} concentrations have likely been below the TCEQ long-term AMCV of $0.059 \ \mu g/m^3$ since 1996 based on the conclusions of the special monitoring study (i.e. 11.48% of TSP measurements were in the PM_{2.5} fraction from 1987 to 2010 at the Dallas-Morrell site).

- The air monitoring data from the Dallas-Morrell site are representative of total nickel concentrations and do not specify the specific forms of nickel. Therefore, to be conservative, the TD recommends emission reductions from Dal Chrome Co. Inc. and any other potential sources impacting this site. Nickel at the Dallas-Morrell site currently remains on TCEQ's Air Pollutant Watch List (<u>APWL0401</u>). Detailed information about the long-term AMCV and noncarcinogenic chronic AMCV for nickel is available in the nickel Development Support Document (<u>DSD</u>).
- Although reported ambient air lead TSP concentrations from monitors around Exide Technologies, Inc. (Exide), Frisco, Texas exceeded the 2008 National Ambient Air Quality Standard (NAAQS) for lead, blood lead levels of Frisco residents did not indicate levels of health concern (i.e., US Centers for Disease Control and Prevention's 10µg/dL (micrograms of lead per deciliter of blood) blood lead level of concern for children) based on:
 - Results from the <u>Blood Lead Exposure Investigation</u> in Frisco during March 2011 by the Texas Department of State Health Services (TDSHS) and
 - Children's blood lead levels predicted by the Integrated Exposure Uptake Biokinetic (IEUBK) model.
- Air quality in the Barnett Shale area is currently under investigation. Detailed information is available on the TCEQ's Barnett Shale Web page at: http://www.tceq.state.tx.us/goto/barnettshale.

Background

The TD has reviewed ambient air sampling data collected from 19 network monitoring sites in TCEQ Region 4, Dallas/Fort Worth. The TD reviewed air monitoring summary results for VOCs and carbonyls from 1-hour and 24-hour samples collected continuously and every sixth day, respectively. The TD also reviewed summary results of metals from 24-hour filter samples (PM_{2.5}, PM₁₀ or TSP) collected every third or sixth day as well as a special monitoring study at Dallas-Morrell site, where a new PM_{2.5} monitor was collocated with the TSP monitor from April 2009 to August 2010 and had the same sampling schedule. In addition, the TD evaluated the criteria pollutant lead from a health perspective in this memorandum. For complete lists of all chemicals evaluated, please see Lists 1 through 4 in Attachment A. Table 1 lists the monitoring sites and provides a link to more information about the sites. A brief summary of the monitoring sites is provided below:

- I-hour autoGC VOC monitoring at 6 sites
- Every sixth day 24-hour canister VOC sampling at 9 sites
- Every sixth day 24-hour carbonyl sampling at 2 sites
- Metals sampling at 8 sites
 - ✓ Every sixth day lead TSP sampling at 4 sites

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- ✓ Every sixth day chromium and nickel TSP or PM_{10} sampling at 1 site
- \checkmark Every third day or sixth day 14 metals PM_{2.5} sampling at 3 sites

City and Site Location	County	EPA Site ID	Monitored Compounds
Frisco, 7471 South 5th Street ^a	Collin	48-085-0003	Lead (TSP)
Frisco, 6931 Ash Street ^a	Collin	48-085-0007	Lead (TSP)
Frisco, <u>6601 Eubanks Street</u>	Collin	48-085-0009	Lead (TSP)
Dallas, <u>1415 Hinton Street</u>	Dallas	48-113-0069	VOCs (autoGC, 24- hour canister), Carbonyl, Metals (PM _{2.5})
Dallas, 3049 Morrell Street ^{a, b}	Dallas	48-113-0018	Metals (TSP, PM_{10})
Dallas, 717 South Akard Street	Dallas	48-113-0050	Metals (PM _{2.5})
Denton, <u>Denton Municipal Airport</u>	Denton	48-121-0034	VOCs (24-hour canister)
DISH, <u>9800 Clark Airport Road</u>	Denton	48-121-1013 ^c (Activation Date: March 31, 2010)	VOCs (autoGC)
Flower Mound, <u>4401 Shiloh Road</u>	Denton	48-121-1007 ^c (Activation Date: October 27, 2010)	VOCs (autoGC)
Midlothian, 2725 Old Fort Worth Road	Ellis	48-139-0016	VOCs (24-hour canister), Metals (PM _{2.5})
Italy, <u>900 Farm to Market Road 667</u>	Ellis	48-139-1044	VOCs (24-hour canister)
Greenville, <u>824 Sayle Street</u>	Hunt	48-231-1006	VOCs (24-hour canister)
Alvarado, <u>2420 Luisa Lane</u>	Johnson	48-251-1008 ^c (Activation Date: November 23, 2010)	VOCs (24-hour canister)

Table 1. Monitoring Sites Located in TCEQ Region 4

City and Site Location	County	EPA Site ID	Monitored Compounds
Kaufman, <u>3790 South Houston Street</u>	Kaufman	48-257-0005	VOCs (24-hour canister)
Terrell, 2988 Temtex Boulevard ^a	Kaufman	48-257-0020 ^c (Activation Date December 22, 2010)	Lead (TSP)
Eagle Mountain, <u>14290 Morris Dido</u> <u>Newark Road</u>	Tarrant	48-439-0075 ^c (Activation Date: March 21, 2010)	VOCs (autoGC)
Fort Worth (Northwest), <u>3317 Ross</u> <u>Avenue</u>	Tarrant	48-439-1002	VOCs (autoGC, 24- hour canister), Carbonyls
Grapevine, <u>4100 Fairway Drive</u>	Tarrant	48-439-3009	VOCs (24-hour canister)
Decatur, <u>301 E Thompson Street</u>	Wise	48-497-0088 ^c (Activation Date: October 06, 2010)	VOCs (autoGC)

^aA link is not available for this site.

^bTSP sampler at the Dallas-Morrell site was replaced with a PM₁₀ sampler on August 17, 2010. ^C Monitor was activated during 2010, insufficient samples were collected for 2010 to meet TCEQ's 75 percent annual data completeness objective.

While the Desert Research Institute conducted the special monitoring study for nickel PM_{2.5} and reported that data collected at the Dallas-Morrell monitoring site, the TCEQ Field Operations Support Division reported the data for all other chemicals evaluated in this memorandum. Except for the data from six new monitors that were activated during 2010 and data from the monitor at the Dallas-Morrell monitoring site, all other data (84 VOCs (canister), 46 VOCs (autoGC), 17 carbonyls, 14 metals (PM_{2.5}) and lead TSP) highlighted in this evaluation met TCEQ's data completeness objective of 75 percent data return.

Four new autoGC monitors (DISH, Flower Mound, Eagle Mountain and Decatur) were added to the TCEQ ambient air monitoring network in Dallas/Fort Worth on various dates in 2010, but there were insufficient samples collected for 2010 to meet TCEQ's 75 percent annual data completeness objective. The TD therefore did not evaluate the annual VOC averages from these four autoGC sites from a chronic health and vegetation perspective, but evaluated the hourly averages from a short-term health and welfare (i.e., odors and adverse effects on vegetation) perspective. Similarly, for a new every sixth day 24-hour canister monitor (Alvarado) and a new every sixth day lead TSP monitor (Terrell) that were added on November 23, 2010 and on December 22, 2010, respectively, there were insufficient samples collected for 2010 to meet TCEQ's 75 percent annual data completeness objective. The TD therefore did not evaluate the data from these two sampling sites. Tony Walker, et al. August 29, 2011 Page 5 of 16

One-hour autoGC VOC samples were compared to TCEQ's short-term AMCVs. Twenty-fourhour air samples collected every third or sixth day for a year are designed to provide representative long-term average concentrations. Short-term or peak concentrations are not captured by 24-hour samples; therefore, daily maximum concentrations have limited use in evaluating the potential for acute health effects. The TD evaluated the reported annual average concentrations from 1-hour autoGC and 24-hour samples for each target analyte for potential chronic health and vegetation concerns by comparing measured chemical concentrations to longterm AMCVs. More information about AMCVs is available online at: http://www.tceq.state.tx.us/implementation/tox/AirToxics.html#amcv. As lead is a criteria pollutant, applicable lead TSP levels (i.e., rolling three-month averages) were compared to the lead NAAQS, however, annual average lead TSP concentrations were also evaluated since they are more representative of long-term lead exposure from a health perspective.

Evaluation

VOCs

Short-Term Data

All hourly average concentrations of the 46 VOCs reported at the six autoGC sites were either not detected or below their respective short-term AMCVs. Therefore, acute adverse health effects, odorous conditions, or vegetation effects would not be expected to occur as a result of exposure to the reported levels of VOCs at these six autoGC monitoring sites.

Long-Term Data

The 2010 annual average concentrations of the 46 VOCs evaluated at the Fort Worth (Northwest) and Dallas-Hinton autoGC monitoring sites and the 84 VOCs reported at each of the eight 24-hour canister monitoring sites were well below their respective long-term AMCVs. Exposure to the reported annual average concentrations would not be expected to cause chronic adverse health or vegetation effects.

Carbonyls

The 2010 annual average concentrations of the 17 carbonyls reported at the Fort Worth (Northwest) and Dallas-Hinton sites were below their respective long-term AMCVs. Exposure to the reported annual average concentrations would not be expected to cause chronic adverse health or vegetation effects.

Metals

At the three sites reporting a full year of $PM_{2.5}$ metals data, excluding a special nickel $PM_{2.5}$ monitoring study at Dallas-Morrell site, annual average concentrations of all 14 metals were well below their respective long-term AMCVs. Exposures to the reported levels of these metals would not be expected to cause chronic adverse health and vegetation effects.

At the Dallas-Morrell site, only nickel and chromium were reported. The TSP sampler at the Dallas-Morrell site was replaced with a PM_{10} sampler on August 17, 2010. Therefore, for the

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best estimate of the annual average concentrations in 2010, the 12-month rolling average TSP concentrations of chromium and nickel were calculated from August 17, 2009 to August 12, 2010. The 12-month rolling average concentration of chromium TSP was below its long-term health-based AMCV. Exposure to the reported 12-month rolling average concentration of chromium TSP would not be expected to cause chronic adverse health effects. The 12-month rolling average concentration of nickel TSP was above the long-term AMCV, and is discussed below.

Nickel at Dallas-Morrell Site

The 12-month rolling average nickel TSP concentration of $0.13 \,\mu g/m^3$ exceeded the long-term AMCV of $0.059 \,\mu g/m^3$ for respirable nickel particles. Elevated annual nickel TSP levels have been detected at the Dallas-Morrell site since 1987 (Figure 1). Beginning in 1995, the annual average nickel TSP concentrations have decreased and stabilized in the range of 0.1 to $0.3 \,\mu g/m^3$ from 1998 through 2010. The reductions in annual nickel levels first observed in 1995 are attributed to actions taken by Dal Chrome Co., Inc., which is an automotive chrome bumper recycling facility located predominantly upwind from the Dallas-Morrell site. The air monitoring data from the Dallas-Morrell site are representative of total nickel concentrations and do not specify the specific forms of nickel. However, Dal Chrome Co., Inc. is known to emit mainly metallic nickel based on the type of the facility and is expected to be the predominant nickel emissions source in the vicinity of the Dallas-Morrell site.



Figure 1. Annual Average Nickel TSP Concentrations at the Dallas-Morrell Site from 1987 to 2010 (Note: a 12-month rolling average concentration from August 17, 2009 to August 12, 2010 was used for 2010)

Long-term AMCV of $0.059 \,\mu g/m^3$ for respirable nickel particles was derived based on risk of developing lung cancer following exposure to carcinogenic forms of nickel in occupational

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workers. Therefore, comparing nickel TSP data to the long-term AMCV for respirable nickel particles may be overly conservative for several reasons, specifically, different PM size fraction, different forms of nickel, and different health effects evaluated (i.e. non-carcinogenic and carcinogenic effects).

Nickel TSP incorporates all particle size fractions less than 50 μ m and contains size fractions which are not in the respirable fraction. Available animal and human inhalation nickel and nickel compound studies have demonstrated that the serious adverse health effects (non-carcinogenic and carcinogenic) are related to exposure to the smaller fractions, specifically PM_{2.5} and smaller, which are taken deep into the lungs.

The available cancer studies of metallic nickel do not adequately support that it is a probable human carcinogen via inhalation exposure. Comparing concentrations of primarily metallic nickel (i.e. noncarcinogenic form of nickel) emitted by Dal Chrome, Inc. to the long-term AMCV is likely conservative, as the long-term AMCV is based on carcinogenic forms of nickel, whereas the nickel emitted by Dal Chrome, Inc. is a different form of nickel and less toxic.

The TD also developed a noncarcinogenic chronic AMCV of $0.23 \ \mu g/m^3$ for respirable nickel particles based on studies with nickel sulfate. The 12-month rolling average nickel TSP concentration of $0.13 \ \mu g/m^3$ is below the noncarcinogenic chronic AMCV of $0.23 \ \mu g/m^3$. Comparing the average nickel TSP concentration of $0.13 \ \mu g/m^3$ to the noncarcinogenic chronic AMCV for nickel is appropriate and is also likely a conservative comparison since chronic (and acute) animal toxicity studies have shown that soluble forms of nickel such as that used to derive the noncarcinogenic chronic AMCV (nickel sulfate) are more toxic than insoluble forms such as metallic nickel (the form evaluated here).

Desert Research Institute Monitoring Study of Collocated TSP and PM_{2.5} Monitors at Dallas-Morrell Site

In order to address the issue of particle size at the Dallas-Morrell site, and to better characterize the more toxicologically relevant nickel PM fraction for risk assessment of nickel exposure, a special monitoring study was conducted from April 2009 to August 2010 at the Dallas-Morrell site. As mentioned above, only TSP samples have historically been collected at this site. During the special monitoring study, however, a new $PM_{2.5}$ monitor was collocated with the TSP monitor and had the same sampling schedule.

The average reported nickel $PM_{2.5}$ concentration of $0.010 \ \mu g/m^3$, collected at the Dallas-Morrell site from April 1, 2009 to August 6, 2010, was below the long-term AMCV of $0.059 \ \mu g/m^3$ for ambient nickel. Reported 24-hour nickel $PM_{2.5}$ levels ranged from non-detect to $0.065 \ \mu g/m^3$. The highest reported 24-hour nickel $PM_{2.5}$ concentration of $0.065 \ \mu g/m^3$ was collected on January 20, 2010, and the second highest reported 24-hour nickel $PM_{2.5}$ concentration of $0.065 \ \mu g/m^3$ was collected on January 20, 2010, and the second highest reported 24-hour nickel $PM_{2.5}$ concentration of $0.058 \ \mu g/m^3$ was collected on May 1, 2009. On both days the monitor was downwind of the Dal Chrome facility. Conversely, most of the 24-hour non-detectable $PM_{2.5}$ samples were collected on days when the monitor was not downwind of the Dal-Chrome facility, suggesting that Dal-Chrome was indeed the source of nickel emissions detected at this monitoring site.

A total of 69 paired samples of TSP and $PM_{2.5}$ were reported at the Dallas-Morrell site during the special study. Thirty of the 69 $PM_{2.5}$ samples, however, were below the method detection limit,

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therefore those sample pairs (both the $PM_{2.5}$ and TSP samples) were excluded from further analysis. Based on the available 39 pairs of detected $PM_{2.5}$ and TSP levels, the TD determined that, on average, 9.49% of the total nickel in TSP was in the $PM_{2.5}$ fraction. The TD also calculated the 95% upper confidence limit (95% UCL) of the mean, which corresponded to 11.48% of the nickel in TSP being in the $PM_{2.5}$ fraction. Conservatively using the 95% UCL of 11.48% of nickel TSP for estimation of nickel $PM_{2.5}$, the TD estimated what the annual nickel $PM_{2.5}$ concentrations would likely have been at the Dallas-Morrell monitor, which collected TSP concentrations from 1987 to August 12, 2010. Figure 2 shows both the historical annual average nickel TSP concentration at the Dallas-Morrell site and the estimated annual average nickel $PM_{2.5}$ concentrations. These conservative estimations indicate that the annual $PM_{2.5}$ concentrations of nickel were likely below TCEQ's long-term AMCV of 0.059 µg/m³ for nickel since 1996.



Figure 2. Annual Average Nickel TSP Concentrations and Estimated Annual Average Nickel PM_{2.5} Concentrations Based on the Assumption that 11.48% of TSP Measurements Were in the PM_{2.5} Fraction from 1987 to 2010 at the Dallas-Morrell Site.

Although there is uncertainty associated with converting annual average nickel concentrations from TSP to an estimated $PM_{2.5}$ fraction (e.g., nickel $PM_{2.5}$ and nickel TSP samples were collected with different filters and analyzed with different methods and at different laboratories), the data collected are useful for deriving a conservative conversion factor and for making some conservative assumptions about the potential for health risks. The TD believes that because the source is known and the $PM_{2.5}$ percentage calculation was conservative (i.e., based on the 95% UCL on the mean), the results of this analysis can be used with a reasonable degree of confidence.

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Available 7-Month Rolling Average Concentration of Nickel PM₁₀ Data from September 17, 2010 to March 28, 2011 at the Dallas-Morrell Site

The TD requested that the TSP monitor at Dallas-Morrell site be replaced with a PM_{10} monitor and that PM_{10} monitor was activated on August 17, 2010. Though there are not enough samples collected for a full evaluation, the available 7- month rolling average nickel PM_{10} concentration of 0.068 µg/m³ from September 17, 2010 to March 28, 2011 indicates that annual average nickel PM_{10} may potentially exceed the long-term AMCV for nickel of 0.059 µg/m³.

However, the TD notes the average concentration of $0.068 \,\mu g/m^3$ is well below the noncarcinogenic chronic AMCV of $0.23 \,\mu g/m^3$, which is again also likely a conservative comparison since chronic (and acute) animal toxicity studies have shown that soluble forms of nickel such as that used to derive the noncarcinogenic chronic AMCV (nickel sulfate) are more toxic than insoluble forms such as metallic nickel (the form evaluated here).

Summary for Nickel at Dallas-Morrell Site

At the Dallas-Morrell monitoring site, the annual average nickel TSP concentration of $0.13\mu g/m^3$, as well as the rolling 7-month average nickel PM_{10} concentration of $0.068 \mu g/m^3$, from September 17, 2010 to March 28, 2011, exceeded the long-term AMCV of $0.059 \mu g/m^3$ for respirable carcinogenic forms of nickel (i.e., PM_{10}). However, exceedances of the long-term nickel AMCV at Dallas-Morrell site do not necessarily mean that chronic adverse effects will occur.

Comparing concentrations of primarily metallic nickel (i.e. noncarcinogenic form of nickel) emitted by Dal Chrome, Inc. to the long-term AMCV for carcinogenic forms of nickel is likely over conservative. Both the annual average nickel TSP concentration of 0.13 μ g/m³ and the rolling 7-month average nickel PM₁₀ concentration of 0.068 μ g/m³ are below the noncarcinogenic chronic AMCV of 0.23 μ g/m³.

In addition, results from a special monitoring study of the more toxicologically relevant nickel PM fraction (i.e. $PM_{2.5}$) indicated that the average reported nickel $PM_{2.5}$ concentration of 0.010 μ g/m³, collected at the Dallas-Morrell site from April 1, 2009 to August 6, 2010, was below the long-term AMCV of 0.059 μ g/m³. The estimated annual average nickel $PM_{2.5}$ concentrations have likely been below the TCEQ long-term AMCV of 0.059 μ g/m³ since 1996 based on the conclusions of the special monitoring study (i.e. 11.48% of TSP measurements were in the PM_{2.5} fraction from 1987 to 2010 at the Dallas-Morrell site).

The air monitoring data from the Dallas-Morrell site are representative of total nickel concentrations and do not specify the specific forms of nickel. Therefore, to be conservative, the TD recommends emission reductions from Dal Chrome Co. Inc. and any other potential sources impacting this site. Nickel at the Dallas-Morrell site currently remains on TCEQ's APWL (APWL0401). Detailed information about the long-term AMCV and noncarcinogenic chronic AMCV for nickel is available in the nickel DSD.

Lead

On November 12, 2008, the U.S. Environmental Protection Agency (EPA) finalized the new $0.15 \ \mu g/m^3$ NAAQS for lead based on a rolling three-month average concentration (73 Federal

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Register 66964). In general, the rule requires source-oriented ambient air lead monitoring at sites with actual annual lead emissions of one or more tons per year. Two lead-acid battery recycling facilities, namely Exide Technologies, Inc. and ECS Refining Texas LLC (hereafter called Exide and ECS, respectively), were identified as the facilities that are required to have source-oriented lead monitoring in TCEQ Region 4. The Terrell Temtex monitor was located predominantly downwind of ECS and was activated on December 22, 2010. Not enough data are currently available to evaluate this site. The rolling three-month averages of lead TSP around Exide exceeded the 0.15 μ g/m³ NAAQS for lead. A health effect evaluation of airborne lead exposure around the Exide facility is provided below.

Lead TSP Monitors around Exide

Three lead TSP monitors (Frisco 7, Frisco Eubanks, and Frisco 5th St.) were established in mid-1990 or earlier and a new monitor (Frisco Stonebrook) was activated on January 7, 2011. The locations of lead monitors around the Exide facility are shown in Figure 3 (Frisco Stonebrook monitor is listed on the map only, data from this monitor is not evaluated in this memorandum). With dominant wind direction being from the south and southeast, the Frisco Eubanks and Frisco 7 monitors are downwind of the Exide facility and the Frisco Stonebrook monitor is upwind of the Exide facility. Ambient air concentrations reported for the Frisco Eubanks monitor are more representative of a worst-case scenario based on predominant winds, proximity to the Exide facility, and possible public access, while concentrations reported for the Frisco 7 monitor are more representative of community lead exposure in the neighborhood. Tony Walker, et al. August 29, 2011 Page 11 of 16



Figure 3. Locations of Lead TSP Monitors around Exide Facility

Reported Lead TSP Concentrations from Monitors around Exide

Annual average concentrations of lead TSP from Frisco 7, Frisco Eubanks, and Frisco 5th St. monitors were fairly consistent since 1995, though with some variations (Figure 4). Higher concentrations were reported from the Frisco Eubanks monitor and lower lead TSP concentrations were reported from the Frisco 7 monitor. Although the ambient lead TSP concentrations around Exide have not changed significantly, the NAAQS for lead was lowered tenfold in 2008 from 1.5 to 0.15 μ g/m³ and the area around Exide is now exceeding the NAAQS.



Figure 4. Annual Average Lead TSP Concentrations from Monitors around Exide Facility from 1994 to 2010

Results from Frisco Blood Lead Exposure Investigation by the TDSHS

The TDSHS conducted a Blood Lead Exposure Investigation in Frisco during March 2011. A person's blood lead level is the best indicator of lead exposure from all sources (e.g. soil, food, toys, lead-based paint, drinking water, ambient air). The results of the blood lead levels of Frisco residents did not show levels of health concern (e.g., they were below CDC's blood lead level of concern for children of 10 μ g/dL). Specifically, of the 608 blood samples tested by the TDSHS laboratory, 575 (95%) did not contain detectable levels of lead (the detection limit was 2 μ g/dL). Only two samples, both from adults who were potentially exposed to lead at their work, were found to have blood lead levels above 10 μ g/dL. Although above the threshold set for children, these two adult blood samples were below the 25 μ g/dL level of concern for adults. Detailed information is available in the Fact Sheet or the Final Report for the investigation. The Fact Sheet is available at: http://www.dshs.state.tx.us/epitox/assess.shtm.

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Children's Blood Lead Levels Predicted by the Integrated Exposure Uptake Biokinetic (IEUBK) Model under Assumed Exposure Conditions

Lead exposure involves multiple pathways from soil/dust, diet, drinking water, and ambient air. The EPA developed the IEUBK model to estimate the blood lead concentrations of children less than seven years old being exposed to lead from multiple sources and pathways. The TD used the IEUBK model (version 1.1, build 11) to compare children's predicted blood lead levels resulting from assumed exposure conditions, and more specifically, exposure to air concentrations at the lead NAAOS, a monitored annual air concentration that meets the NAAOS and the highest monitored three-month air concentration that exceeds the NAAQS. Reported 2010 results for the Frisco 7 monitor were used as they are more representative of community lead exposure. Default IEUBK model parameters were used, except the TD used representative soil concentrations (i.e., the average Frisco soil lead concentration) and the assumed air exposure concentrations being evaluated (i.e., the NAAQS, the monitored annual average, and the highest rolling three-month average). Using the average Frisco soil lead concentration of 38.31 mg/kg (from EPA soil sampling around Exide in March 2010), the estimated geometric mean blood lead levels for children were similar (1.22 to 1.30 µg/dL) regardless of whether the NAAQS $(0.15 \,\mu g/m^3)$, the reported annual average $(0.11 \,\mu g/m^3)$, or the highest rolling three-month average $(0.21 \,\mu\text{g/m}^3)$ lead concentration from the Frisco 7 community monitor was used as an input to the IEUBK model (Table 2). More importantly, 0% of children were predicted to exceed the blood lead level of concern, $10 \mu g/dL$ (Table 2).

Table 2. Predicted Children Blood Lead Levels Based on the Reported Lead TSP Concentrations from the Frisco 7 Community Monitor in 2010 with an Average Frisco Soil Concentration of 38.31 mg/kg.

Parameter	2008 NAAQS	Annual Average	Highest Rolling 3- month Average
Ambient Air Concentration Input (μg/m ³)	0.15	0.11	0.21
Estimated Geometric Mean Blood Lead (µg/dL)	1.25	1.22	1.30
Predicted % Blood Lead over 10 μg/dL	0.00	0.00	0.00

Note: the detection limit for the blood lead analytical method is 2µg/dL

These IEUBK model results predict non-detectable levels of lead in children's blood under assumed exposure conditions (i.e., air monitoring results and soil sampling results) and are consistent with TDSHS not having identified any children with elevated blood lead based on results from their Blood Lead Exposure Investigation in Frisco during March 2011.

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Lead Summary

Although reported ambient air lead TSP concentrations around Exide exceeded the 2008 lead NAAQS, neither the results of the Blood Lead Exposure Investigation in Frisco during March 2011 by the TDSHS nor predicted children blood lead levels by the IEUBK model indicate blood lead levels of concern.

Investigations of Air Quality and Barnett Shale Activities

In response to concerns about Barnett Shale oil and gas operations, the TCEQ has performed extensive mobile monitoring and is in the process of significantly expanding the network of stationary samplers that measure VOCs. In addition, as of December 17, 2009, the agency has implemented a 12-hour response time for all complaints received concerning oil and gas facilities in the 24-county Barnett Shale area. The Dallas/Fort Worth regional staff conducts weekly reconnaissance investigations in the Fort Worth area and in DISH, Texas. The regional office also conducts monitoring, as time and resources permit, at the request of the public and other interested parties. Detailed information is available on the TCEQ's Barnett Shale Web page at: http://www.tceq.state.tx.us/goto/barnettshale.

If you have any questions regarding the contents of this review, please do not hesitate to contact me at (512) 239-1336 or via email at <u>gulan.sun@tceq.texas.gov</u>.

cc (via email):

Casso, Ruben- EPA Region 6, Dallas Prosperie, Susan- Department of State Health Services Tony Walker, et al. August 29, 2011 Page 15 of 16

Attachment A

1.1.2.2-Tetrachloroethane	Bromomethane	Methyl Chloroform (1.1.1-
1.1.2-Trichloroethane	Carbon Tetrachloride	Trichloroethane)
1.1-Dichloroethane	Chlorobenzene	Methylcyclohexane
1,1-Dichloroethylene	Chloroform	Methylcyclopentane
1,2,3-Trimethylbenzene	Chloromethane (Methyl	N-Butane
1,2,4-Trimethylbenzene	Chloride)	N-Decane
1,2-Dichloropropane	Cis 1,3-Dichloropropene	N-Heptane
1,3,5-Trimethylbenzene	Cis-2-Butene	N-Hexane
1,3-Butadiene	Cis-2-Hexene	N-Nonane
1-Butene	Cis-2-Pentene	N-Octane
1-Hexene+2-Methyl-1-Pentene	Cyclohexane	N-Pentane
1-Pentene	Cyclopentane	N-Propylbenzene
2,2,4-Trimethylpentane	Cyclopentene	N-Undecane
2,2-Dimethylbutane (Neohexane)	Dichlorodifluoromethane	O-Ethyltoluene
2,3,4-Trimethylpentane	Dichloromethane (Methylene	O-Xylene
2,3-Dimethylbutane	Chloride)	P-Diethylbenzene
2,3-Dimethylpentane	Ethane	P-Ethyltoluene
2,4-Dimethylpentane	Ethylbenzene	Propane
2-Chloropentane	Ethylene	Propylene
2-Methyl-2-Butene	Ethylene Dibromide (1,2-	Styrene
2-Methylheptane	Dibromoethane)	Tetrachloroethylene
2-Methylhexane	Ethylene Dichloride (1,2-	Toluene
2-Methylpentane (Isohexane)	Dichloroethane)	Trans-1-3-Dichloropropylene
3-Methyl-1-Butene	Isobutane	Trans-2-Butene
3-Methylheptane	Isopentane (2-Methylbutane)	Trans-2-Hexene
3-Methylhexane	Isoprene	Trans-2-Pentene
3-Methylpentane	Isopropylbenzene (Cumene)	Trichloroethylene
4-Methyl-1-Pentene	M-Diethylbenzene	Trichlorofluoromethane
Acetylene	M-Ethyltoluene	Vinyl Chloride
Benzene	M/P Xylene	

List 1. Target VOC Analytes in Canister Samples

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List 2. Target Carbonyl Analytes

2,5-Dimethylbenzaldehyde	Formaldehyde	o-Tolualdehyde
Acetaldehyde	Heptaldehyde	Propanal - Propionaldehyde
Acetone	Hexanaldehyde	p-Tolualdehyde
Acrolein	Isovaleraldehyde	Valeraldehyde
Benzaldehyde	Methyl Ethyl Ketone	
Butyraldehyde	(MEK)/Methacrolein	
Crotonaldehyde - 2-Butenal	m-Tolualdehyde	

List 3. Target Metal Analytes

Aluminum (PM _{2.5})	Chromium (PM _{2.5} , PM ₁₀ and TSP)	Molybdenum (PM _{2.5})
Antimony (PM _{2.5})	Cobalt (PM _{2.5})	Nickel (PM _{2.5} , PM ₁₀ and TSP)
Arsenic (PM _{2.5})	Copper (PM _{2.5})	Selenium (PM _{2.5})
Barium (PM _{2.5})	Lead (TSP)	Tin (PM _{2.5})
Cadmium (PM _{2.5})	Manganese(PM _{2.5})	Zinc $(PM_{2.5})$

List 4. Target VOC Analytes in AutoGC

Benzene	n-Decane
c-2-Butene	n-Heptane
c-2-Pentene	n-Hexane
Cyclohexane	n-Nonane
Cyclopentane	n-Octane
Ethane	n-Pentane
Ethyl Benzene	n-Propylbenzene
Ethylene	o-Xylene
Isobutane	p-Xylene + m-Xylene
Isopentane	Propane
Isoprene	Propylene
Isopropyl Benzene - Cumene	Styrene
Methylcyclohexane	t-2-Butene
Methylcyclopentane	t-2-Pentene
n-Butane	Toluene
	Benzene c-2-Butene c-2-Pentene Cyclohexane Cyclopentane Ethane Ethyl Benzene Ethylene Isobutane Isopentane Isoprene Isopropyl Benzene - Cumene Methylcyclohexane Methylcyclopentane n-Butane