DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: Colfax Treating Company, L.L.C.
Facility Address: 3600 Koppers Street, Alexandria, Louisiana
Facility EPA ID #: LAD 069 524 981 (AI # 97707)

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

   __X__ If yes - check here and continue with #2 below.

   _____ If no – re-evaluate existing data, or

   _____ If data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land-or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Facility Description and Operations

The Colfax treating Company, (formerly LLC Roy O. Martin Lumber Company, LP and Durawood Treating Company) property is located at 3600 Koppers Street in Alexandria, Rapides Parish, Louisiana; see Figure 1 for an area map. The American Lumber and Treating Company originally constructed the wood preservation facility in 1926. In 1944, Koppers Company, Inc., (Koppers Company, Inc. was purchased by Beazer East, Inc. in 1988) purchased and operated the wood preservation facility utilizing creosote and pentachlorophenol in the process.

In 1970, the facility and property was purchased by the Roy O. Martin Lumber Company, Inc., and began operations under the name Durawood Treating Company utilizing creosote and on-site generated used oil in the wood preservation process. The process utilizes creosote and on-site generated used oil to treat railroad cross ties. The excess creosote from the process is returned to storage tanks for future use. All process and storm water that contains creosote is transferred to the facility's wastewater treatment tanks for separation prior to discharge to the City of Alexandria Publicly Owned Treatment Works (POTW). The separated creosote and used oil is returned to the work tanks for reuse in the wood preservation process.

In 1986, Durawood Treating Company completed closure of the vacuum pump cooling water ponds and a portion of the former Chatlin Lake Canal that crossed the property as RCRA Treatment, Storage and Disposal (TSD) units. On September 30, 1994, the LDEQ issued Durawood Treating Company a Final Hazardous Waste Post-Closure Permit for the two closed hazardous waste management units, effective on November 7, 1994, and continuing for ten (10) years. On September 30, 1996, the facility was issued a permit modification to include the Hazardous and Solid Waste Amendments (HSWA) provisions. The permit modification became effective on November 6, 1996, remaining in effect until November 7, 2004.

In December of 1999, Railworks Wood Products, Inc., purchased the wood preservation facility to continue operations under the business name of Dura-Wood, LLC (Dura-Wood, LLC filed for protection under the U.S. Bankruptcy Code in 2001). Colfax Treating Company, LLC, (a subsidiary of the Roy O. Martin Lumber Company, Limited Partnership) retained ownership and responsibility of the northeastern portion of the property containing the two closed hazardous waste management units, groundwater monitoring wells, groundwater recovery wells, and most of the piezometers. The property retained by Colfax Treating Company, LLC contains approximately 11.87 acres. See Figure 2 for a site map showing location of monitoring wells.

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2. Are **groundwater**, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	X			See Below
Air (indoors) [2]		X		
Surface Soil (e.g., <2 ft)	X			See Below
Surface Water		X		
Sediment		X		
Subsurf. Soil (e.g., >2ft)	X			See Below
Air (outdoors)		X		

____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

__X__ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

Groundwater

The two hazardous waste management units subject to post-closure ground water monitoring are (1) Chatlin Lake Canal (closed surface impoundment) and (2) Vacuum Pump Cooling Water Pond (closed surface impoundment).

In 1986, the facility completed closure of the process water ponds and the portion of the former Chatlin Lake Canal on the property in accordance with RCRA regulations. The primary waste from these units was bottom sediment sludge from the treatment of wastewaters from wood-preserving processes that used creosote and/or pentachlorophenol (K001). The facility installed a groundwater recovery system as a means of corrective action. Groundwater is recovered from eight recovery wells located along the closed section of the former Chatlin Lake Canal and pumped to a continuous mix aeration basin for biological treatment. The groundwater is then discharged to the City of Alexandria POTW by authority of a City Discharge Permit. Compliance monitoring and corrective action is on going.

Groundwater monitoring is conducted in accordance with the Groundwater Sampling and Analysis Plan of the Final Hazardous Waste Post-Closure Permit, as modified on September 30, 1996. In November of 2001, compliance wells MW-23 and MW-24 were converted into recovery wells MW-23R and MW-24R. In April of 2004, two additional plume defining wells, MW-35 and MW-36 were installed.

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There are a total of forty-eight monitoring wells, recovery wells and piezometers at the facility. Currently, there is one designated upgradient well, five point of compliance wells, eight corrective action (recovery) wells and nine plume defining wells. The corrective action wells recover groundwater from the Alluvial Zone, which is then pumped to a continuous mix aeration basin for biological treatment prior to being discharged to the City of Alexandria POTW by authority of a City Discharge Permit. The continuous mix aeration basin uses a flow totalizer to measure the amount of water discharged to the City of Alexandria POTW. The volume of water contributed by each well is estimated using ratios of the average instantaneous flow rates during each month.

The groundwater monitoring system and frequency of analysis is described as follows:

Quarterly Sampling
Upgradient Well (Alluvial Zone): MW-14A
Point of Compliance Wells (Alluvial Zone): MW-6R, MW-23R and MW-24R
Point of Compliance Wells (Miocene Zone): MW-5C and MW-22B
Recovery Wells (Alluvial Zone): MW-4R, MW-6R, MW-7R, MW-8R, MW-16R, MW-17R, MW-23R and MW-24R

Semi-Annual Sampling
Plume Defining Wells: MW-1N, MW-5B, MW-10C, MW-12B, MW-13, MW-22A, MW-34, MW-35 and MW-36.

The plume defining wells are analyzed for 28 semi-volatile constituents, three volatile constituents, specific conductivity, pH, and total phenolics. The parameter list for three of the quarterly samples for the point of compliance wells is the same. On an annual basis, groundwater samples from the five point of compliance wells are analyzed for the LAC 33:V.3325.Table 4 parameters to determine if additional hazardous constituents are present. If the annual sampling indicates any hazardous constituents are present, then those constituents are added to the quarterly monitoring list. See Table 1 for information regarding monitoring wells; Table 2 list the groundwater monitoring parameters.

Three of the quarterly samples from each recovery well are analyzed for 28 semi-volatile constituents. The remaining quarterly sample from each recovery well is analyzed for the 28 semi-volatile constituents, three volatile constituents, specific conductivity, pH and total phenolics. Recovery wells MW-6R, MW-23R and MW-24R are also point-of-compliance wells. Three quarterly samples from these wells are analyzed for the semi-volatile constituents, volatile constituents, specific conductivity, pH, and total phenolics. The remaining quarterly sample is analyzed for the LAC 33:V.3325.Table 4 parameters.

The groundwater monitoring reports indicate the presence of volatile and semi-volatile organic constituents and inorganic constituents at concentrations that exceed the practical quantitation limit, the EPA established drinking water standard, or the alternate concentration limit established by the administrative authority under LAC 33:I.Chapter 13, Risk Evaluation/Corrective Action Program (RECAP). See Figures 3 and 4 for isoconcentration maps of the upper and lower aquifers at the site.

Surface Soil (e.g., <2 ft) and Subsurface Soil (e.g., >2ft)

As part of the RCRA Facility Investigation (RFI), an off-site investigation was conducted in August of 1999 to determine the impact along the former Chatlin Lake Canal. Soil and groundwater samples obtained from the western end of the former canal exhibited constituent concentrations above the alternate concentration limit established by the administrative authority under LAC 33:I.Chapter 13, RECAP. The extent of impact along the western end of the former canal was not determined at the time. The soil and

groundwater samples obtained from the eastern end of the former canal were from locations that did not provide sufficient data to evaluate the impact along the former Chatlin Lake Canal.

In April of 2004, an additional off-site investigation was conducted to determine the extent of impact to soil and groundwater along the former Chatlin Lake Canal. The final report has not been submitted to the LDEQ, but the "RFI Workplan Addendum (East End of Canal Continuance), Ball and McGough Engineering, Inc." indicates that the extent of contamination has been delineated to the western end of the former Chatlin Lake Canal.

Footnotes:

1. "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

2. Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

References:

1. *Final Hazardous Waste Post-Closure Permit, Permit No. LAD 069 524 981 PC-1*, September 30, 1994;

2. *Modification of the Final Hazardous Waste Post-Closure Permit, Permit No. LAD 069 524 981 MP-1*, September 30, 1996;

3. *RFI Final Report*, Ball Engineering, Inc., March 2000

4. *2001 Annual Groundwater Monitoring Report*, Ball Engineering, Inc., February 2002;

5. *2002 Annual Groundwater Monitoring Report*, Ball Engineering, Inc., February 2003;

6. *2003 Annual Groundwater Monitoring Report*, Ball Engineering, Inc., February 2004;

7. *2004 Annual Groundwater Monitoring Report*, Ball and McGough Engineering, Inc., February 2005;

8. *2005 Annual Groundwater Monitoring Report*, Providence Engineering, Inc., March 2006;

9. *2006 Semi-Annual Groundwater Monitoring Report*, Providence Engineering, Inc., November 2006;

10. *Comprehensive Groundwater Monitoring Evaluation Report*, LDEQ Environmental Technology Division, 2003;

11. *Facility Interview Form*, LDEQ Environmental Technology Division, April 2004;

12. *RFI Workplan Addendum (East End of Canal Continuance)*, Ball and McGough Engineering, Inc., March 2005;

13. *Hazardous Waste Post Closure Permit Renewal Application*, Providence Engineering, Inc., May 2004;

14. *Hazardous Waste Post Closure Permit Renewal Application, Chatlin Lake Canal / Vacuum Pump Cooling Water Pond – Response to Notice of Deficiencies*, Providence Engineering, Inc., May 2004;

15. *Facility Interview Form*, LDEQ Environmental Technology Division, December 2006.

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3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day Care	Construction	Trespassers	Recreation	Food[3]
Groundwater	No	No	No	Yes	No	No	No
~~Air (Indoors)~~	----	----	----	----	----	----	----
Soil (surface, e.g., < 2 ft)	Yes	Yes	No	Yes	Yes	No	No
~~Surface Water~~	----	----	----	----	----	----	----
~~Sediment~~	----	----	----	----	----	----	----
Soil (subsurface e.g., > 2ft)	No	No	No	Yes	No	No	No
~~Air (outdoors)~~	----	----	----	----	----	----	----

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

2. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

3. Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

___ If no (pathways are not complete for any contaminated media-receptor combination) -skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_X_ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

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Rationale and Reference(s):

Groundwater

The corrective action wells recover groundwater from the Alluvial Zone, which is then pumped to a continuous mix aeration basin for biological treatment prior to being discharged to the City of Alexandria POTW by authority of a City Discharge Permit. The groundwater from the upgradient well, point of compliance wells, and recovery wells is monitored quarterly to determine constituent concentrations and the stability of the contaminant plume. Groundwater from the site is not utilized in any manner; therefore, the potential for exposure is limited to construction workers.

Soil (surface, e.g., < 2 ft)

In April of 2004, an additional off-site investigation was conducted to determine the extent of impact to soil and groundwater along the former Chatlin Lake Canal. The final report has not been submitted to the LDEQ, but the "RFI Workplan Addendum (East End of Canal Continuance), Ball and McGough Engineering, Inc." indicates that the extent of contamination has been delineated to the western end of the former Chatlin Lake Canal and proposes additional investigation activities along the eastern end of the former Chatlin Lake Canal. Visual observations made during the off-site investigation confirmed the presence of creosote constituents in surface soil along the eastern end of the former canal. The former residential area in the vicinity of the eastern end of the former canal, has been acquired by the Colfax Treating Co., LLC for the purposes of controlling access to contaminated surface soils. Colfax has placed restrictions on any activity in this area that may disturb surface soils or create exposure pathways, including notifications to the railroad and the City of Alexandria. Based on the above considerations, the eastern end of the former canal is not accessible to residents, workers, and, construction workers; however, this area may be accessible to trespassers.

Soil (subsurface e.g., > 2ft)

As part of the RCRA Facility Investigation (RFI), an off-site investigation was conducted in August of 1999 to determine the impact along the former Chatlin Lake Canal. Soil and groundwater samples obtained from the western end of the former canal exhibited constituent concentrations above the alternate concentration limit established by the administrative authority under LAC 33:I.Chapter 13, RECAP. The extent of impact along the western end of the former canal was not determined at the time.

In April of 2004, an additional off-site investigation was conducted to determine the extent of impact to soil and groundwater along the former Chatlin Lake Canal. The final report has not been submitted to the LDEQ, but the "RFI Workplan Addendum (East End of Canal Continuance), Ball and McGough Engineering, Inc." indicates that the extent of contamination has been delineated to the western end of the former Chatlin Lake Canal. The western end of the former canal is located within the City of Alexandria Flood Control Basin with limited access restrictions. Due to limited access restrictions and depth of soil impact, the potential for exposure is limited to construction workers.

References:

1. *Final Hazardous Waste Post-Closure Permit, Permit No. LAD 069 524 981 PC-1*, September 30, 1994;

2. *Modification of the Final Hazardous Waste Post-Closure Permit, Permit No. LAD 069 524 981 MP-1*, September 30, 1996;

3. *RFI Final Report*, Ball Engineering, Inc., March 2000

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5. *2002 Annual Groundwater Monitoring Report*, Ball Engineering, Inc., February 2003;

6. *2003 Annual Groundwater Monitoring Report*, Ball Engineering, Inc., February 2004;

7. *2004 Annual Groundwater Monitoring Report*, Ball and McGough Engineering, Inc., February 2005;

8. *2005 Annual Groundwater Monitoring Report*, Providence Engineering, Inc., March 2006;

9. *2006 Semi-Annual Groundwater Monitoring Report*, Providence Engineering, Inc., November 2006;

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11. *Facility Interview Form*, LDEQ Environmental Technology Division, April 2004;

12. *RFI Workplan Addendum (East End of Canal Continuance)*, Ball and McGough Engineering, Inc., March 2005;

13. *Hazardous Waste Post Closure Permit Renewal Application*, Providence Engineering, Inc., May 2004;

14. *Hazardous Waste Post Closure Permit Renewal Application, Chatlin Lake Canal / Vacuum Pump Cooling Water Pond – Response to Notice of Deficiencies*, Providence Engineering, Inc., May 2004;

15. *Facility Interview Form*, LDEQ Environmental Technology Division, December 2006.

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

   __X__ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

[4]If there is any question on whether the identified exposures are "significant" (i.e., potentially unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

Rationale and Reference(s):

Groundwater

The potential exposure to groundwater is minimal and limited to construction workers. The construction workers with potential exposure are required to have OSHA Hazardous Worker Protection training, be equipped with necessary personal protective equipment, as well as obtaining a company issued construction permit prior to conducting any work on the groundwater monitoring system. Therefore, the exposures can be reasonably expected to be insignificant.

Soil (surface, e.g., < 2 ft)

The potential exposure to surface soil along the eastern end of the former Chatlin Lake Canal is associated with direct contact for trespassers. Colfax Treating Co., LLC has acquired the property in this area. The area is fenced to the north along the railroad right-of-way. Colfax has informed both the City of Alexandria and the railroad of the environmental conditions in the area. On December 28, 2006, Colfax Treating Co., LLC, in cooperation with LDEQ, installed signs adjacent to the eastern portion of the canal warning against digging or other activities in this area. Additionally, Colfax is negotiating with the City of Alexandria and with the railroad so that the entire area can be fenced as additional access control. Therefore, due to the acquisition of this area by Colfax, restrictions by Colfax on the use of this land, access restrictions along the railroad, and placement of warning signs along the canal, the potential exposures to trespassers can be reasonably expected to be insignificant. Additional investigation of this area has been proposed by Colfax and approved by LDEQ. See Figure 5 for proposed soil boring locations and

approximate location of warning signs. Based on the results of additional investigation, this determination will be re-evaluated by LDEQ.

Soil (subsurface e.g., > 2ft)

Due to limited access restrictions within the City of Alexandria Flood Control Basin and depth of soil impact, the potential for exposure along the western end of the former Chatlin Lake Canal is minimal and limited to construction workers. Therefore, the exposures can be reasonably expected to be insignificant.

References:

1. *Final Hazardous Waste Post-Closure Permit, Permit No. LAD 069 524 981 PC-1*, September 30, 1994;

2. *Modification of the Final Hazardous Waste Post-Closure Permit, Permit No. LAD 069 524 981 MP-1*, September 30, 1996;

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5. *2002 Annual Groundwater Monitoring Report*, Ball Engineering, Inc., February 2003;

6. *2003 Annual Groundwater Monitoring Report*, Ball Engineering, Inc., February 2004;

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15. *Facility Interview Form*, LDEQ Environmental Technology Division, December 2006.

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5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

_NA_ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_NA_ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_NA_ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" tatus code

Rationale and Reference(s):

Not Applicable

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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

__X__ YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Colfax Treating Co., LLC facility, EPA ID No. LAD 069 524 981 (AI# 97707) , located at 3600 Koppers Street; Alexandria, LA, under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

____ NO - "Current Human Exposures" are NOT "Under Control."

_____ IN - More information is needed to make a determination.

Completed by (signature) _____ Date December 29, 2006
(print) Steve Archibald
(title) Geologist

Supervisor (signature) _____ Date December 29, 2006
(print) Narendra M. Dave
(title) Geological Manger
(EPA Region or State) Louisiana DEQ

Concur
2/8/07
GPD-M

Locations where References may be found:

LDEQ Electronic Data Management System – Baton Rouge, LA
LDEQ Northeast Regional Office Facility Files – West Monroe, LA
U.S. EPA Region 6 Files – Dallas, TX
On-site facility records and correspondence files – Alexandria, LA

Contact telephone and e-mail numbers

(name) Steve Archibald
(phone #) (318) 362-5439
(e-mail) steven.archibald@la.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

ATTACHMENTS
AVAILABLE
UPON REQUEST