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**PVT LANDFILL
HUMAN HEALTH RISK ASSESSMENT
OF AES CONDITIONED ASH
LIMITED DEMONSTRATION PROJECT**

Submitted To:

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Waianae, Hawaii 96792

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EXECUTIVE SUMMARY

The Hawaii Department of Health (DOH) has requested that a demonstration project and human health risk assessment be performed to evaluate the safety of using AES conditioned coal ash for various soil replacement operational uses at PVT Landfill. According to the DOH the demonstration project and assessment should include all uses for which ash is being considered for beneficial reuse. Beneficial reuses evaluated in this assessment include:

- Daily cover,
- Void space fill,
- Interim daily cover and;
- Liquid adsorption

The demonstration project consisted of ambient air monitoring for respirable dust during actual operational use of AES ash for void space fill and daily cover. Respirable dust concentrations (PM₁₀) were measured by Active Air Monitoring and Real-Time Personal DataRAM (pDR). The respirable particulate data measured in the demonstration project was used in conjunction with chemical analytical data of AES ash samples collected from 2008 to 2009 to estimate chemical concentrations at specific receptor locations at the work site and in the adjacent community. Forty-two (42) composite conditioned ash samples (analyzed for antimony, arsenic, barium, beryllium, boron, cadmium, chromium, copper, iron, lead, mercury, molybdenum, nickel, selenium, silver, thallium, and zinc) were included in the analysis. The UCL 95 percentile mean concentration was assumed to be representative of future conditioned ash chemical concentrations to be used at PVT for operational uses. Utilization of such a robust historical dataset ensured that inter- and intra-batch variability was not a significant contributor to uncertainty. All respirable dust measured in this study was assumed to be ash-derived.

Potential health risks were estimated for landfill workers directly working with ash who may inhale ash-derived dust and ingest and dermally absorb metals in ash. Potential health risks via the inhalation pathway were also estimated for hypothetical adult and child

residents who live approximately 1/4 mile downwind from the demonstration project site. Potential estimated lifetime cancer risks were compared to the USEPA and DOH regulatory level of concern of 1×10^{-5} for commercial and industrial workers and 1×10^{-6} for residential receptors. Estimated noncarcinogenic risks are presented as total site Hazard Indices that sum the Hazard Quotients of each Chemical of Potential Concern at the site. A total Hazard Index of 1 was considered to be the regulatory level of concern.

Although not specifically evaluated in the demonstration project and risk assessment, the use of AES conditioned ash for other operational uses such as interim cover and liquid adsorption is qualitatively addressed below and is also considered acceptable practice. The use of AES ash as interim cover was considered for analysis but was deemed *Not Required* because PVT standard operating procedures require that any ash used as soil replacement be covered by a minimum of 6 inches of soil within 1 month of application (i.e., there are no true interim cover scenarios anticipated). Quantitative risk evaluation of AES ash for liquid adsorption was also deemed *Not Required*. The addition of any liquids to coal ash was presumed to increase percent moisture and for all practical purposes reduce dust and airborne particulate generation. Any risk associated with ash further wetted for the purposes of liquid adsorption was assumed to be lower than uses evaluated in the current assessment.

WORKER RESULTS

Two worker scenarios were evaluated. The first scenario assumed a worker is in the immediate vicinity of ash dumping and ash use, 8 hours per day, 250 days a year, for 25 years and contacts ash and inhales chemicals in ash-derived dust. The second worker scenario assumed a worker is in the immediate vicinity of ash use during final daily end cap activities 1 hour per day, 250 days a year, for 25 years. Cumulative carcinogenic and noncarcinogenic risks to both worker scenarios were below regulatory levels of concern. For the 8 hour worker, the total cumulative carcinogenic risk and noncarcinogenic hazard index was $1\text{E-}05$ and 0.8 respectively. Cumulative carcinogenic risk and noncarcinogenic hazards for the 1 hour daily end cap worker were $1\text{E-}05$ and 0.3, respectively.

HYPOTHETICAL RESIDENT RESULTS

The residential scenario assumed fugitive dust is generated during ash dumping, ash handling activities and wind erosion. The residential scenario assumed migration of fugitive dust (24 hrs/day) to residential areas located approximately ¼ mile away from the site. Residents were assumed to inhale site-derived dust 24 hrs/day, 350 days/year for 30 years. Carcinogenic and noncarcinogenic risks due to inhalation pathways only were 5E-08 and .01, respectively.

SECTION 1 INTRODUCTION

PVT Landfill has retained AMEC Earth and Environmental (AMEC) to quantify potential human health risks associated with various operational uses of AES conditioned ash at PVT Landfill. This document presents the results of the beneficial ash reuse demonstration project and corresponding human health risk assessment (HHRA). The methodology and approach to this study have been previously described in the Sampling and Analysis Plan (AMEC, 2009) and are discussed herein. Deviations from the sampling plan are noted in this report.

According to the DOH the demonstration project and assessment should include all uses for which ash is being considered for beneficial reuse. Beneficial reuses evaluated in this assessment include:

- Daily cover,
- Void space fill,
- Interim daily cover and;
- Liquid adsorption

The HHRA evaluated the impact to workers at the Site during delivery, movement and handling of coal ash. The risk assessment assumed workers would directly contact coal ash as well as inhale airborne particulates containing heavy metals present in ash generated from movement and use of AES ash. The HHRA also evaluated risks to nearby residents (in a residential scenario). Residents were assumed to be exposed to metals in fugitive dust generated by operational uses of ash.

1.1 Site and Sampling Area Location

The PVT Landfill Site is located at 87-2020 Farrington Highway on the western side of the island of O'ahu, in Nanakuli, Hawai'i (Figure 1). The PVT Landfill Site consists of an irregularly shaped 15.44-acre parcel of land (Latitude/Longitude: 21° 23' 50" N/158° 09' 00"W). The Site is bounded by residential areas at its southern and western borders.

1.2 Approach

This investigation was performed in 2 phases:

Phase 1: Ambient Air Monitoring (Section 2)

- Respirable dust concentrations (PM10) were measured by Active Air Monitoring and Real-Time Personal Data Rams (PDR)

Phase 2: Human Health Risk Assessment (Section 3)

- Conditioned ash analytical lab data for metals were combined with fugitive dust data measured in Phase 1 to assess the potential for human health risks to workers and nearby residents.

Respirable particulate data was used in conjunction with ash analytical data (provided by PVT Landfill) to estimate COPC concentrations at specific receptor locations at the site and in the adjacent community. Ash analytical data (from AES Hawaii through PVT Landfill) provided historical metals data for AES Coal Ash. Mean historic metals concentrations were assumed to represent future ash concentrations. All dust generated was assumed to be ash-derived.

SECTION 2

AIR MONITORING

Air monitoring was performed in order to determine the respiratory risk associated with the delivery, movement and handling of ash. AMEC utilized two monitoring methods, active air sampling and real-time air monitoring, to determine the amount of respirable particulates (PM10) generated during operational use of AES ash. Air monitoring for respirable dust was conducted at the landfill on October 26, 2009. Air sampling locations are shown on Figure 2 and in Appendix B, photos. Following is a description of the two air monitoring methods used:

Active Air Sampling

Active air sampling was utilized to collect air particulates during different landfill activities. Five (5) sets of low-flow air pumps were positioned at different areas of the landfill face. The pumps were placed at the following locations: 1) by the ash pile, 2) at the road above the ash pile, 3) high area above the ash pile, 4) east of the ash pile, and 5) during end cap activities. Pumps ran for the duration of ash handling activities during delivery and use of fresh AES coal ash. The pumps were set at an air collection rate appropriate for total dust and PM10 particulates. Air samples were submitted to the laboratory for total dust and PM10 analysis.

Real-Time Air Monitoring

Real-time air monitoring, via Personal DataRAM (pDR), was the second method used to determine if nuisance dust was being generated during specific landfill activities (delivery of ash, movement of ash in between delivery of waste, movement of ash at the end of the day). PM10 data was collected using a pDR with cyclone to determine respirable dust concentrations associated with the above listed specific activities.

Results from both the active and real-time sampling events were evaluated and the maximum concentration from either of the data sets was used in the air dispersion model, SCREEN3. SCREEN3 is a single source Gaussian plume model which provides maximum ground-level concentrations for point, area, flare, and volume sources, as well as concentrations in the cavity zone, and concentrations due to inversion break-up and shoreline fumigation. SCREEN3 is a screening version of the ISC3 model.

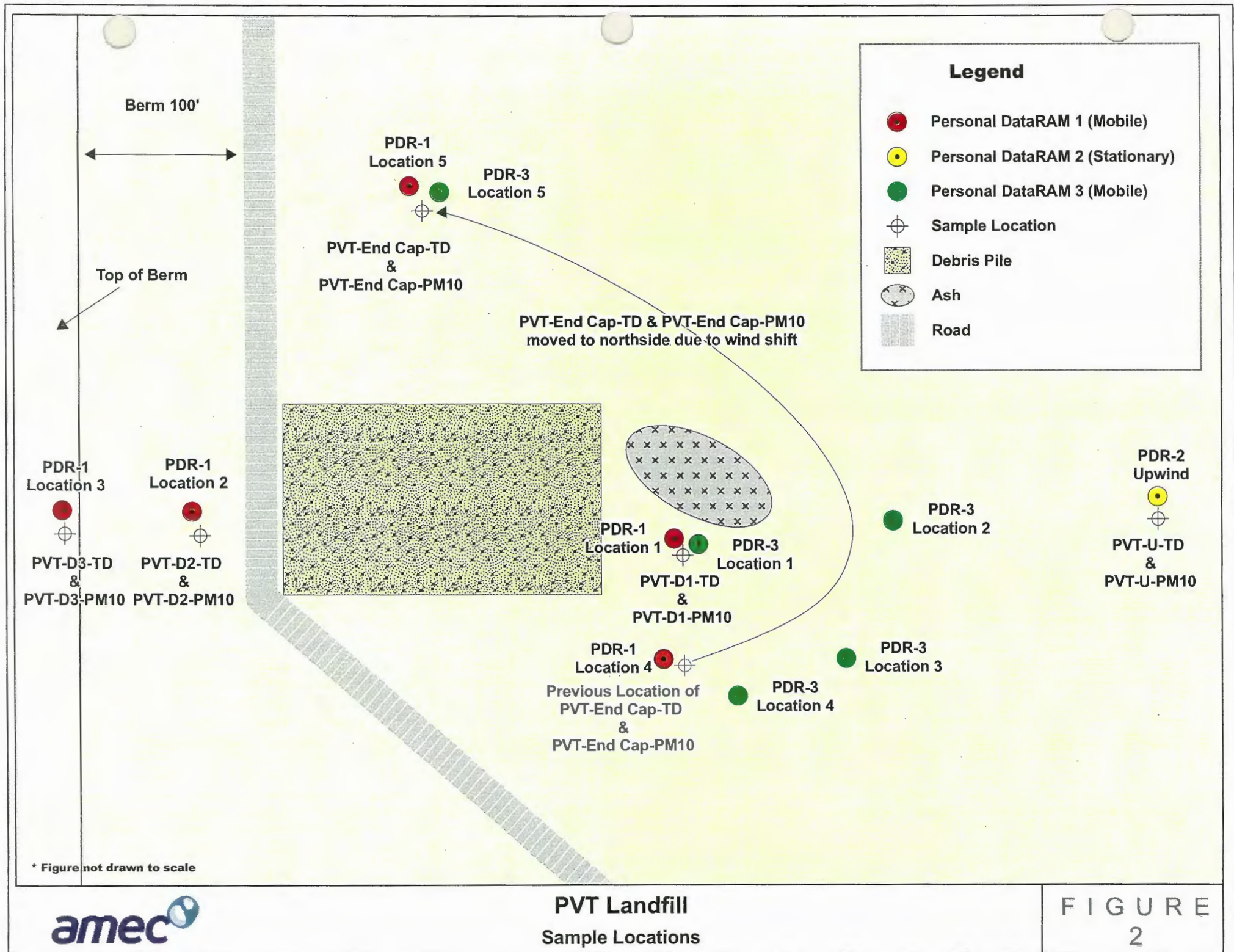
As previously mentioned, the active sampling data provides dust concentrations from a specific landfill activity (ash handling activities during delivery and use of fresh AES coal ash). This concentration is collected over an abbreviated period of time and does not represent an 8-hour time weighted average (TWA). The pDR real time data better represents the 8-hour TWA as it was collected over the course of the work day and therefore higher dust generation periods are offset by periods of lower dust generation. A summary of dust data for the active sampling event and pDR readings are presented in Tables 2-1 and 2-2. Again, in an effort to be health protective, this assessment has utilized the highest dust concentrations in evaluating potential risk.

TABLE 2-1
PM10 Active Air Monitoring Results

Sample ID - Location	Concentration (mg/m ³)
PVT-D1 PM10 – Ash Pile	0.3
PVT-D2 PM10 – Road Above Ash Pile	0.59
PVT-D3 PM10 – High Area Above Ash Pile	0.34
PVT-U PM10 – East of Ash Pile	0.05
PVT-End Cap PM10 – Ash Pile	1.1

TABLE 2-2
Personal DataRAM (PDR) PM10 Ambient Air Monitoring Results

Location	Maximum Concentration (mg/m ³)	Average Concentration (mg/m ³)
PDR-1 – Followed Active Samples D1-2-3-End Cap	1.67	0.044
PDR-2 – Upwind Location by PVT-U	2.88	0.055
PDR-3 - Rover	3.584	0.051



SECTION 3 HUMAN HEALTH RISK ASSESSMENT

A human health risk assessment was conducted to quantify potential risks to workers at the facility and for adult and children residents who might breathe site-related chemicals associated with ash handling activities. Chemicals of Potential Concern (COPCs) included all metals analyzed by AES. Workers were assumed to directly contact ash and inhale dust generated during operational activities, specifically, during the application of ash as daily cover and void space fill. Residential receptors were evaluated assuming they would inhale fugitive dust only.

As described in Section 2 above, AMEC collected fugitive dust data to determine realistic emission rates for specific operational uses. Emission rates were then used as inputs into SCREEN3 to conservatively estimate maximum ground-level concentrations of respirable dust at the nearest residential receptor point. Respirable particulate data was used in conjunction with ash analytical data (provided by PVT Landfill) to estimate COPC concentrations at specific receptor locations at the site and in the adjacent community. Potential health risks via the inhalation pathway were estimated for adult and child residents who reside approximately 1/4 mile from disposal site. Potential health risks were also estimated for workers at the facility which may inhale ash derived dust and directly contact the ash.

The phases of the risk process are described herein. The protocol adopted is consistent with the approach recommended by the National Research Council (NRC). The NRC, established by the National Academy of Sciences (NAS) to further scientific knowledge and to advise the federal government, has established a four-step paradigm for conducting health-based risk assessments (NAS 1983). This paradigm has been adopted by USEPA as well as many federal and state regulatory agencies. In accordance with the NRC recommendations, this risk assessment is organized into the following four steps:

- Hazard Identification;
- Toxicity Assessment;
- Exposure Assessment; and
- Risk Characterization.

Each of these steps is detailed in the section below.

3.1 Hazard Identification

In this step, compounds assumed to be of concern are selected for inclusion in the quantitative risk assessment. These compounds are designated as COPCs. The selection of COPCs for this investigation is based upon historical information regarding the chemical composition of AES conditioned ash.

Analytical data for metals were provided for ash samples collected bi-monthly at AES for the years 2008 and 2009. A total of forty-two (42) composite conditioned ash samples were included in this risk assessment. Metals analyzed include antimony, arsenic, barium, beryllium, boron, cadmium, chromium, copper, iron, lead, mercury, molybdenum, nickel, selenium, silver, thallium, and zinc. Valence state of chromium was not available and was assumed present in a 1:6 chromium VI to chromium III ratio. All chemicals listed above were included as COPCs for evaluation in the human health risk assessment.

3.2. Toxicity Assessment

The USEPA states that the purpose of the Toxicity Assessment is to "weigh available evidence regarding the potential for particular contaminants to cause adverse effects in exposed individuals and to provide, where possible, an estimate of the relationship between the extent of exposure to a contaminant and the increased likelihood and/or severity of adverse effects" (USEPA 1989a)." In essence, the Toxicity Assessment can also be described as a Dose-Response Assessment. A Dose-Response Assessment is used to identify both the types of adverse health effects a COPC may potentially cause, as well as the relationship between the amount of COPCs to which receptors may be exposed (dose) and the likelihood of an adverse health effect (response). The USEPA characterizes adverse health effects as either carcinogenic or noncarcinogenic and dose-response relationships are defined for oral and inhalation routes of exposure. Dermal exposure toxicity criteria are estimated based on oral criteria. The results of the toxicity assessment, when combined with the results of the exposure assessment provide an estimate of potential risk.

The most current USEPA-verified dose-response criteria were used in this assessment. Dose-response information was obtained from the following sources, in order of priority:

U.S. EPA's Integrated Risk Information System (IRIS) (USEPA, 2009a);
U.S. EPA's Provisional Peer Reviewed Toxicity Values (PPRTV) (USEPA, 2009b);
Agency for Toxicity Substances and Disease Registry (ASTDR, 2009)
U.S. EPA's Health Effects Assessment Summary Tables (HEAST) (USEPA, 1997);

In the case of lead, there is no U.S. EPA-verified Reference Dose. However, because lead was only detected at concentrations below Hawaii Department of Health Environmental Action Levels (EALs), and U.S. EPA Regional Screening Levels (RSLs), it was not considered for further quantitative analysis.

Noncarcinogenic dose-response information for both oral and inhalation routes of exposure were used when available. To evaluate inhalation exposure, U.S. EPA has derived reference concentrations (RfCs) for certain compounds. For use in estimating intake, these RfCs (in units of mg/m^3) are converted to reference doses (RfDs) (in units of $\text{mg}/\text{kg}\text{-day}$) by multiplying by a $20 \text{ m}^3/\text{day}$ inhalation rate and dividing by the adult body weight of 70 kg (USEPA 1997b). This conversion allows the risk assessment to consider activity-specific inhalation rates described in the exposure assessment.

To evaluate carcinogenic risks from oral exposures, the U.S. EPA has derived cancer slope factors expressed in terms of $(\text{mg}/\text{kg}\text{-day})^{-1}$. Carcinogenic dose-response values for inhalation exposures are generally provided as inhalation unit risk (IUR) values expressed in terms of $(\mu\text{g}/\text{m}^3)^{-1}$. For this assessment, IUR values are converted to an inhalation CSF correcting for body weight, inhalation rates, and units using the following equation:

$$CSF_{inh} = \frac{IUR \times 70\text{kg}}{20\text{m}^3 / \text{day}} \times 1000 \mu\text{g} / \text{mg}$$

where:

CSF_{inh}	=	inhalation cancer slope factor $(\text{mg}/\text{kg}\text{-day})^{-1}$
IUR	=	inhalation unit risk $(\mu\text{g}/\text{m}^3)^{-1}$
70 kg	=	body weight

1000 µg/mg = conversion factor; and
20 m³/day = inhalation rate.

3.3 Exposure Assessment

In the Exposure Assessment, the magnitude and frequency of a receptors' potential exposure to COPCs is quantified. Exposure factors including length and duration of exposure, inhalation and ingestion rates, body weights, and absorption adjustment factors are designated during this phase of work. Based on the results of above-described tasks, the final phase of the exposure assessment is the derivation of exposure point concentrations and the calculation of average daily doses. The results of the exposure assessment are described in the following subsections.

3.3.1 Identification of Receptors

Potential human receptors for this investigation are adult workers at the facility and adult and children residents who may breathe fugitive dust containing COPCs. Adult and child residents were identified based on characteristics of the site and surrounding area and the specific concerns of the neighboring community.

3.3.2 Identification of Potential Exposure Pathways

Potential exposure pathways are the mechanisms by which the receptors in the study area may be exposed to compounds emitted from the landfill during disposal events. According to U.S. EPA (1989), four elements must be present in order for a potential human exposure pathway to be complete:

- a source and mechanism of compound release to the environment ;
- an environmental transport medium;
- an exposure point, or point of potential contact with the potentially impacted medium; and
- a receptor with a route of exposure at the point of contact.

The pathways examined in this risk assessment include:

- Direct contact for the workers on site;
- Inhalation for the workers to dust onsite; and,
- Inhalation of fugitive dust offsite to neighboring communities.

3.3.3 Identification of Exposure Scenarios

Exposure scenarios describe the frequency and magnitude of exposure to chemicals as they relate to specific receptors and exposure pathways. The exposure scenarios evaluated in this risk assessment include the following:

- Industrial Workers presumed to be exposed to contaminants in ash via direct contact and onsite dust generation during ash handling operations 8 hours/day, 250 days/year for a 25 year period;
- Industrial (daily endcap) workers presumed to be exposed to contaminants in ash via direct contact and onsite dust generation during daily end capping operations 1 hour/day, 250 days/year for a 25 year period;
- Resident Adults presumed to be exposed to contaminants in ash via fugitive dust generation. Ash handling operations are assumed to occur 24 hrs/day for a 24 year period;
- Resident Children presumed to be exposed to contaminants in ash via fugitive dust generation. Ash handling operations are assumed to occur 24 hrs/day for a 6 year period;

The two residential scenarios are summed to create a total 30 year residential scenario including 6 years as a child and 24 years as an adult.

3.3.4 Estimation of Exposure Point Concentrations in Ash

Exposure point concentrations for constituents detected in the ash were estimated using all relevant analytical data provided to AMEC from AES Hawaii. Exposure point concentrations (UCL 95th percentile on the mean) were derived in accordance with USEPA guidance (USEPA, 2002a) using USEPA's ProUCL software (USEPA, 2004c). Results are presented in Appendix E. In calculating exposure point concentrations, a value equal to one-half the limit of detection reported by the laboratory was used as a surrogate concentration for those constituents that were not detected in a particular sample as specified by U.S. EPA (1989a). Table 2-3 presents the EPCs calculated in this assessment.

TABLE 2-3
Exposure Point Concentrations in Ash

Constituent	EPC Concentration in Ash (mg/kg)
METALS	
Antimony	0.719
Arsenic	18.17
Barium	645.2
Beryllium	3.121
Boron	769.7
Cadmium	0.606
Chromium VI (1:6 VI:III Ratio)*	8.232
Copper	35.39
Iron	25350
Lead	21.64
Mercury, Divalent	0.404
Molybdenum	6.741
Nickel	95.72
Selenium	1.931
Silver	0.772
Thallium	0.651
Zinc	596.7

3.3.5 Estimation of Exposure Point Concentrations in Fugitive Dust

In order to estimate the concentration of chemicals transported by fugitive dust to resident locations it was first necessary to estimate the respirable dust concentration at receptor locations. This process required the derivation of two scenario-specific PM₁₀ emission rates (Q). The first emission rate (hereafter called Ash Handling Activities Emission Rate) estimated via the Box Model (Stern 1984) describes the dust generating potential caused by various human activities at the landfill (i.e., dumping, pushing, compacting). The second emission rate is based on the unlimited erosion model (hereafter called the Unlimited Erosion Model Emission Rate) and estimates the PM₁₀ emission rate due to atmospheric dispersion generated from wind erosion of site ash (assuming contaminated ash is left uncovered).

Ash Handling Activities Emission Rate

PM₁₀ emissions would be generated by several landfill ash handling activities. The PM₁₀ emission rate (Q) during these activities was determined using a Box Model (Stern, 1984).

Estimation of the ash handling activities PM10 emission rate could either be based on the maximum PM10 concentration at any monitoring location during active air sampling or on the maximum average PM10 concentration collected from the PDR data sets. The maximum PM10 concentration from any monitoring location (1100 ug/m³) which occurred during the final end cap activities was significantly higher than the average PDR data (55 ug/m³) and was conservatively chosen as the PM10 concentration for modeling purposes. Health risks estimated using the average PM10 concentration from the PDR would be significantly lower than estimated in this assessment for inhalation pathways.

The Box Model is presented as below:

$$E_{10} = (L \times Q / (h \times u_{mean})) \times 10^6$$

or

$$Q = (E_{10} \times h \times u_{mean}) / (L \times 10^6)$$

where:

- Q: PM10 emission rate (g/s-m²)
- E₁₀: PM10 concentration (ug/m³)
- h: mixing height
- u_{mean}: mean wind speed (m/s), and
- L: landfill length.

The PM10 concentration (E₁₀) was derived from site-specific data obtained during the air monitoring sampling. The maximum onsite PM10 concentration for any of the five monitoring locations was 1100 ug/m³. This occurred during the end cap activities and was used for emission rate calculations for the fugitive dust emission rates. The emission rate based on this value is 1.4E-04 g/s-m². Calculations are presented below.

$$Q = (E_{10} \times h \times u_{mean}) / (L \times 10^6)$$

Parameters	Value	Reference
Q: PM10 emission rate (g/s-m ²)		calculated
E ₁₀ : PM10 concentrations (ug/m ³)	1100	
h: mixing height	2	
u _{mean} : mean wind speed (m/s)	2.8	site-specific
L: landfill length	45	site-specific

$$Q = 1.4E-04$$

Unlimited Erosion Model Emission Rate

The second emission rate was derived using the unlimited erosion factor. The unlimited erosion factor equation is used to determine the emission rate due to atmospheric dispersion generated from wind erosion of soil (assumes ash erosion is equivalent and left uncovered). Site-specific PM10 data are not required. The equation used to estimate the emission rate assuming wind dispersion of uncovered ash is provided below.

$$Q = 0.036 \times (1 - V) \times (u_{mean} / u_t)^3 \times F(y) \times (1 / 3600)$$

where:

- Q: PM10 emission factor (g/s-m²)
- V: fraction of surface vegetative cover, V = 0 (assumption)
- u_{mean}: mean annual wind speed (m/s), u_{mean} = 2.8 m/s (site-specific data)
- u_t: threshold value of wind speed at 7m (m/s)
- y: y = 0.886 u_t / u_{mean} (dimensionless ratio), and
- F(y): function of y (USEPA 1985).

For this equation, the fraction of surface vegetative cover was assumed to be zero. As mentioned above, the site-specific wind speed is 2.8 m/s (6.2 mph). Parameters for u_t and F(y) were obtained from USEPA (2004a) and are equal to 11.32 and 0.194 m/s, respectively. Using these variables and the above equation, the emission factor for PM10 (PM10 emission rate, or Q) was calculated as 2.9E-08 g/s-m². Calculations are presented below.

$$Q = 0.036 \times (1 - V) \times (u_{mean} / u_t)^3 \times F(y) \times (1 / 3600)$$

Parameters	Value	Reference
Q: PM10 emission factor (g/s-m ²)		calculated
V: fraction of surface vegetative cover	0	
u _{mean} : mean annual wind speed (m/s)	2.8	site-specific
F(y): function of y [0.886 u _t / u _{mean} (dimensionless ratio)]	0.194	default (USEPA 2004a)
u _t : threshold value of wind speed at 7 m (m/s)	11.32	default (USEPA 2004a)

$$Q = 2.9E-08$$

SCREEN3 PM10 Concentrations

The SCREEN3 air dispersion model (Version 96043) (USEPA 1995) was used to predict off-site ambient PM10 concentrations for various scenarios based on the calculated emission rates for both ash handling operations and wind erosion of the landfill surface. SCREEN3 determines 1-hour maximum chemical concentrations under worst-case wind conditions. It assumes that fugitive dust blows in the direction of the receptor continuously, 100% of the time. The model does not allow for an adjustment to be made to the percentage of time wind blows in the direction of the residents over a longer averaging time. To account for this, U.S. EPA states that annual average PM10 concentrations should be calculated by multiplying the 1-hour maximum concentration by a factor of 0.08 (USEPA 1992). However, this assessment utilized a Hawaii-specific value of 0.2 (Personal Communication with Dr. Barbara Brooks, HEER Office). 0.2 is a health protective adjustment factor which considers Hawaii-specific wind and meteorological conditions.

The source areas at the ash disposal area of the landfill site were modeled as ground-level sources of 45 x 45 square meters (0.5 acre). 0.5 acres is the USEPA Region 9 default source size as well as the approximate area of ash handling at PVT Landfill. The receptors were deployed using the SCREEN3 receptor distance array ranging from 402 meters (1/4 mile) out to 8,047 meters with a receptor height of 1.8 m. It was assumed that the entire area was an emission source.

SCREEN3 calculations were based on the following assumptions:

Parameter	Value
Source type	area
Source release height	0.1 m
Length of larger side for area	45 m
Length of smaller side of area	45 m
Receptor height above ground	1.8 m
Urban or Rural Area	Rural
Meteorology	
Stability class	1 – Unstable/Turbulent
Anemometer height wind	2.8 m/s

As noted above, air dispersion modeling was conducted for both dust generated in ash handling activities and due to wind erosion, in order to conservatively estimate the amount of wind blown dust to nearby residential areas.

1. SCREEN3 air dispersion modeling results for ash handling activities resulted in a maximum respirable dust concentration of 4.669 ug/m^3 at a distance of 1/4 mile away for dust generating activities. After applying the 0.2 adjustment factor, the annual average respirable dust concentration is 0.934 ug/m^3 at a distance of 1/4 mile away for dust generating activities. This annual average is significantly lower than the National Ambient Air Quality Standards (NAAQS) PM10 annual limit of 50 ug/m^3 .
2. SCREEN3 air dispersion modeling results for the wind erosion data set result in a maximum respirable dust concentration of 0.00099 ug/m^3 at a distance of 1/4 mile away for dust generating activities. After applying the 0.2 adjustment factor, the annual average respirable dust concentration is 0.0002 ug/m^3 at a distance of 1/4 mile away from the demonstration project site. This annual average is significantly lower than the National Ambient Air Quality Standards (NAAQS) PM10 annual limit of 50 ug/m^3 .

The SCREEN3 air dispersion model calculations are presented in Appendix F. Table 2-4 lists the measured PM_{10} concentration at the site and SCREEN3 results at 1/4 mile.

TABLE 2-4
PM10 Respirable Dust Concentrations

	Measured Concentration (ug/m^3)	Estimated Concentration at 1/4 mile* (ug/m^3)
Ash Handling Activities		
PVT- End Cap PM10	1100	0.934
Unlimited Erosion Model		
	NA	0.00099

Estimation of COPC Concentrations in Dust at Offsite Locations

Estimated dust concentrations, both via ash handling activities as well as the unlimited erosion model, as determined by the SCREEN3 were multiplied by the exposure point concentration of the COPCs in the ash (Table 2-3) to estimate the concentration of COPCs in the fugitive dust which migrates to neighborhoods approximately 1/4 mile offsite to the potential residential receptors.

Estimation of COPC Concentrations in Dust at Onsite Locations

Measured PM₁₀ concentrations, the maximum measured during the course of the day and during end cap activities, were multiplied by the exposure point concentration of the COPCs in ash (Table 2-3) to estimate the concentration of COPCs in the dust for inhalation pathway to the workers onsite. Maximum PM₁₀ concentration measured during the course of the day was 590 ug/m³. Maximum PM₁₀ concentration measured during end cap activities was 1100 ug/m³, which was also conservatively used in the SCREEN3 analysis for modeling dust migration off site.

3.3.6 Exposure Dose Calculations

This section describes the equations and assumptions used to evaluate a receptor's potential exposure to compounds. The equation used to calculate Chronic Average Daily Dose (CADD) estimates a receptor's potential daily intake from exposure to compounds with potential noncarcinogenic effects. According to USEPA (1989), the exposure dose is calculated by averaging over the period of time for which the receptor is assumed to be exposed. The CADD for each compound via each route of exposure is compared to the noncarcinogenic reference dose for that compound in order to estimate the potential noncarcinogenic hazard index due to exposure to that compound via that route of exposure.

For compounds with potential carcinogenic effects, the equation for Lifetime Average Daily Dose (LADD) is employed to estimate potential exposures. In accordance with USEPA (1989), the LADD is calculated by averaging the assumed exposure over the receptor's entire lifetime (assumed to be 70 years). The LADD for each compound via each route of exposure is combined with the cancer slope factor for that compound in order to estimate the potential carcinogenic risk due to exposure to that compound via that route of exposure.

The equations for estimating a receptor's average daily dose (both lifetime and chronic) are presented in the following subsections. The exposure parameters used in each potential exposure pathway are also discussed in the following subsections.

Estimation of Potential Exposure via Inhalation

Calculations of potential risk resulting from the inhalation of the respirable fraction of particulates in air (i.e., particles < 10 pm in diameter) are presented in Appendix G. The equation used to calculate the CADD and LADD due to inhalation exposure is as follows:

$$A = \frac{B \times C \times D \times E \times F \times G \times H}{I \times J}$$

where:

- A = Average Daily Dose following Inhalation (mg/kg-day)
- B = Compound Concentration in Ash (mg/kg)
- C = Concentration of Respirable Particulates in Air (mg/m³)
- D = Inhalation Rate (m³/hr)
- E = Exposure Time (hr/day)
- F = Exposure Frequency (days/year)
- G = Exposure duration (years)
- H = Inhalation Absorption Adjustment Factor (unitless)
- I = Body Weight (kg)
- J = Averaging Time (days)

Estimation of Potential Exposure via Direct Contact

Ash Ingestion

$$A = \frac{B \times C \times D \times E \times F \times G \times H}{I \times J}$$

where:

- A = Average Daily Dose Due to Ash Ingestion (mg/kg-day)
- B = Constituent Concentration in Ash (mg/kg)
- C = Unit Conversion Factor (1x10⁻⁶ kg/mg)
- D = Ingestion Rate (mg/day)
- E = Exposure Frequency (days/year)
- F = Exposure Duration (years)
- G = Oral-Soil Absorption Adjustment Factor (unitless)
- H = Area Use Factor (unitless)
- I = Body Weight (kg)
- J = Averaging Time (days)

Dermal Contact with Ash

$$A = \frac{B \times C \times D \times E \times F \times G \times H \times I}{J \times K}$$

where:

A = Average Daily Dose Due to Dermal Contact (mg/kg-day)

B = Constituent Concentration in Ash (mg/kg)

C = Unit Conversion Factor (1×10^{-6} kg/mg)

D = Skin Adherence Factor (mg/cm²)

E = Skin Surface Area Exposed (cm²/day)

F = Exposure Frequency (days/year)

G = Exposure Duration (years)

H = Dermal-Soil Absorption Adjustment Factor (unitless)

I = Area Use Factor (unitless)

J = Body Weight (kg)

K = Averaging Time (days)

Each of the parameters in these equations is described below.

Chemical Concentration in Ash

The data used in this risk assessment are provided in Appendix D. EPCs were calculated using the 95% UCL of the analytical data (Table 2-3).

Concentration of Respirable Particulates in Air

Respirable particulate concentrations in air at offsite locations for the residential scenarios were calculated in the SCREEN3 analysis. Respirable particulate concentrations in air onsite for the worker scenarios were the measured PM₁₀ concentrations. It was assumed that 100% of the respirable particles are ash-derived.

Inhalation Rate

Inhalation of particulate matter is a function of the ambient concentration of particulate matter, inhalation rate, relative bioavailability, and human body weight.

It is assumed that the average inhalation rate is age and activity dependent. The average daily inhalation rate for children was assumed to be 10 m³/day. The average daily inhalation rate for adults was assumed to be 20 m³/day.

Exposure Time and Frequency

Assuming that dust is generated only during ash handling activities, offsite residents would be exposed to contaminants only for the duration of these operations. However, for this assessment it was assumed that ash handling operations are occurring 24 hrs/day for the entire exposure duration period. Accordingly, offsite adult and children residents were also assumed to be continuously exposed to fugitive dust generated from the site 24 hours/day, 350 days/year. Workers were assumed to be on site for an 8 hours/day, 250 days/year. End cap workers were assumed to be exposed for only 1 hour/day, 250 days/year.

Exposure Duration

As previously described, the risk assessment assumes that potential offsite residential receptors are exposed for a 30 year period. This 30 year duration is split between 6 years as a child and 24 years as an adult. The worker receptor assumes a 25 year employment tenure.

Absorption Adjustment Factors

Absorption is assumed to be 100% via the inhalation route of exposure for all COPCs. The oral and dermal absorption adjustment factors were taken from the Hawaii Department of Health EALs, U.S. EPA RSLs, or derived by AMEC. In cases where no absorption factor was found, a default of 1 was used.

Body Weight

The body weights assumed in this risk assessment are 15 kg for the child and 70 kg for the adult receptors (USEPA 2001c).

Averaging Time

The average daily dose of COPCs used to calculate noncarcinogenic risks must be averaged over the duration which the receptor is assumed to be exposed (USEPA 1989). Therefore, in the CADD calculations, the averaging time is equal to the exposure duration (above).

The average daily dose used to determine potential carcinogenic effects, however, must be averaged over the entire lifetime (70 years), regardless of the length of time which the receptor is assumed to be exposed (USEPA 1989).

TABLE 2-5
Exposure Assumptions

Receptor	Parameter (units)	Value
Adult Resident	Exposure Duration (hr/d)	24
	Exposure Frequency (d/y)	350
	Exposure Period (y)	24
	Body Weight (kg)	70
	Averaging Period - Lifetime (d)	25550
	Averaging Period - Chronic Noncancer (d)	8760
	Inhalation Rate	0.833 m ³ /hr
	Respirable particulate concentration in air (mg/m ³)	9.34E-04 mg/m ³
	Fraction from Site (unitless)	1
Child Resident	Exposure Duration (hr/d)	24
	Exposure Frequency (d/y)	365
	Exposure Period (y)	6
	Body Weight (kg)	15
	Averaging Period - Lifetime (d)	25550
	Averaging Period - Noncancer (d)	2190
	Inhalation Rate	0.417 m ³ /hr
	Respirable particulate concentration in air (mg/m ³)	9.34E-04 mg/m ³
	Fraction from Site (unitless)	1
Worker	Exposure Duration (hr/d)	8
	Exposure Frequency (d/y)	250
	Exposure Period (y)	25
	Body Weight (kg)	70
	Averaging Period - Lifetime (d)	25550
	Averaging Period - Noncancer (d)	9125
	Inhalation Rate	0.833 m ³ /hr
	Ingestion Rate	100 mg/day
	Skin Surface Area	3300 cm ²
	Adherence Factor	0.29 mg/cm ² /event
	Respirable particulate concentration in air (mg/m ³)	5.90E-01 mg/m ³
	Fraction from Site (unitless)	1

End Cap Worker	Exposure Duration (hr/d)	1
	Exposure Frequency (d/y)	250
	Exposure Period (y)	25
	Body Weight (kg)	70
	Averaging Period - Lifetime (d)	25550
	Averaging Period - Noncancer (d)	9125
	Inhalation Rate	0.833 m ³ /hr
	Ingestion Rate	100 mg/day
	Skin Surface Area	3300 cm ²
	Adherence Factor	0.29 mg/cm ² /event
	Respirable particulate concentration in air (mg/m ³)	1.10E+00 mg/m ³
	Fraction from Site (unitless)	1

3.4 Risk Characterization

The Risk Characterization combines the results of the Exposure Assessment with the results of the Toxicity Assessment to derive quantitative estimates of the potential for adverse health effects to occur as a result of potential exposure to AES coal ash. The potential for both noncarcinogenic and carcinogenic effects are estimated for each receptor for each potential exposure pathway identified in the Exposure Assessment. The risks from each exposure pathway are summed to obtain an estimate of total risk for each receptor.

The risk characterization is the step in the risk assessment process that combines the results of the exposure assessment and the toxicity assessment for each compound of concern in order to estimate the potential for carcinogenic and noncarcinogenic human health effects from chronic exposure to that compound. This section summarizes the results of the risk characterization for each receptor evaluated in the risk assessment.

3.4.1 Noncarcinogenic Risk Characterization

The potential for exposures to COPCs to result in adverse noncarcinogenic health effects is estimated for each receptor by comparing the Chronic Average Daily Dose (CADD) for each compound with the Reference Dose for that compound. The resulting ratio, which is unitless, is known as the Hazard Quotient (HQ) for that compound. The HQ is calculated using the following formula:

$$A = \frac{B}{C}$$

where:

- A = Hazard Quotient (unitless);
- B = Chronic Average Daily Dose (mg/kg-day); and
- C = Reference Dose (mg/kg-day).

When the Hazard Quotient for a given compound does not exceed 1, the Reference Dose has not been exceeded, and no adverse noncarcinogenic health effects are expected to occur as a result of exposure to that compound via that route. The HQs for each compound are summed to yield the Hazard Index (HI) for that pathway. An HI is calculated for each receptor for each pathway by which the receptor is assumed to be exposed. A Total Hazard Index for a chemical is then calculated for each receptor by summing the pathway-specific HIs. A Total HI for a chemical that does not exceed 1 for a given receptor indicates that no adverse noncarcinogenic health effects are expected to occur as a result of that receptor's potential exposure to a chemical in the environmental media. The HIs calculated for this assessment are presented in Table 2-7. All HIs were lower than the U.S. EPA and HDOH criterion goal of 1.

TABLE 2-7
Noncarcinogenic Risk

RECEPTOR	HAZARD QUOTIENT
Worker, 8-hour inhalation exposure	6E-01
Worker, 1-hour end cap inhalation exposure	1E-01
Worker, dermal and ingestion exposure	2E-01
Adult Resident, inhalation exposure	4E-03
Child Resident, inhalation exposure	9E-03

3.4.2 Carcinogenic Risk Characterization

The purpose of carcinogenic risk characterization is to estimate the likelihood, over and above the background cancer rate, that a receptor will develop cancer in his or her lifetime as a result of facility-related exposures to COPCs in various environmental media. This likelihood is a function of

the dose of a compound and the Cancer Slope Factor (CSF) for that compound. The relationship between the Excess Lifetime Cancer Risk (ELCR) and the estimated Lifetime Average Daily Dose (LADD) of a compound may be expressed by the exponential equation:

$$A = 1 - e^{-BC}$$

where:

- A = Excess Lifetime Cancer Risk (unitless);
- B = Cancer Slope Factor (1/(mg/kg-day)); and
- C = Lifetime Average Daily Dose (mg/kg-day).

When the product of the CSF and the LADD is much greater than 1, the ELCR approaches 1 (i.e., 100% probability). When the product is less than 0.01 (10^{-2}), the equation can be closely approximated by the linear equation:

$$A = B \times C$$

where:

- A = Excess Lifetime Cancer Risk (unitless);
- B = Cancer Slope Factor (1/(mg/kg-day)); and
- C = Lifetime Average Daily Dose (mg/kg-day).

The product of the CSF and the LADD is unitless, and provides an estimate of the potential carcinogenic risk associated with a receptor's exposure to that compound via that pathway. ELCRs are calculated for each potentially carcinogenic compound. For each receptor, the ELCRs for each pathway by which the receptor is assumed to be exposed are calculated by summing the potential risks derived for each compound. A Total Excess Lifetime Cancer Risk is then calculated by summing the pathway-specific ELCRs. The ELCRs calculated for this assessment are presented in Table 2-8. All risks to the offsite residential receptors were substantially lower than the USEPA and HDOH point of departure value of 1 E-06. Risks to the two worker scenarios

exceeded the point of departure value of 1E-06, but were below the USEPA and DOH regulatory level of concern of 1E-05 for commercial and industrial workers.

TABLE 2-8
Carcinogenic Risk

RECEPTOR	CANCER RISK
Worker, 8-hour inhalation exposure	5E-06
Worker, 1-hour end cap inhalation exposure	1E-06
Worker, dermal and ingestion exposure	5E-06
Adult Resident, inhalation exposure	3E-08
Child Resident, inhalation exposure	2E-08

TABLE 2-9
Final Risk Results
Human Health Risk Assessment

RECEPTOR	Hazard Index	Cancer Risk
End Cap Worker Total (End Cap Inhalation + Direct Contact)	3E-01	6E-06
Worker Total (Worker Inhalation + Direct Contact)	8E-01	1E-05
Residential Total (Child Inhalation + Adult Inhalation)	1E-02	5E-08

SECTION 4 UNCERTAINTY ANALYSIS

The risk assessment for the beneficial reuse of AES coal ash at PVT Landfill contains many assumptions that lead to significant uncertainty. The assumptions that introduce the greatest amount of uncertainty in this risk assessment are discussed in this section. They are discussed in general terms, because for most of the assumptions there is not enough information to assign a numerical value that can be factored into the calculation of risk.

Within any of the four steps of the risk assessment process, assumptions must be made due to a lack of absolute scientific knowledge. Some of the assumptions are supported by considerable scientific evidence, while others have less support. Every assumption introduces some degree of uncertainty into the risk assessment process. Conservative assumptions are made throughout the risk assessment to ensure that the health of local residents is protected. Therefore, when all of the assumptions are combined, it is much more likely that actual risks, if any, are overestimated rather than underestimated.

4.1 Hazard Identification

During the Hazard Identification step, compounds are selected for inclusion in the quantitative risk assessment. For this assessment all 17 metals analyzed for in AES coal ash were selected as COPCs. As such the level of uncertainty in selecting COPCs is also assumed low. Accordingly, little uncertainty is introduced by the Hazard Identification step.

4.2 Toxicity Assessment

Dose-response values are usually based on limited toxicological data. For this reason, a margin of safety is built into estimates of both carcinogenic and noncarcinogenic risk, and actual risks are lower than those estimated. The two major areas of uncertainty introduced in the dose-response assessment are: (1) animal to human extrapolation; and (2) high to low dose extrapolation.

Human dose-response values are often extrapolated, or estimated, using the results of animal studies. Extrapolation from animals to humans introduces a great deal of uncertainty in the risk assessment because in most instances, it is not known how differently a human may react to the chemical compared to the animal species used to test the compound. The procedures used to extrapolate from animals to humans involve conservative assumptions and incorporate several uncertainty factors that overestimate the adverse effects associated with a specific dose. As a result, overestimation of the potential for adverse effects to humans is more likely than underestimation.

Predicting potential health effects from the facility emissions requires the use of models to extrapolate the observed health effects from the high doses used in laboratory studies to the anticipated human health effects from low doses experienced in the environment. The models contain conservative assumptions to account for the large degree of uncertainty associated with this extrapolation (especially for potential carcinogens) and therefore, tend to be more likely to overestimate than underestimate the risks.

This risk assessment also took a very conservative approach regarding the bioaccessible fraction of COPCs available to be absorbed by the body. These relative absorption factors (RAFs) estimate the amount a chemical that is absorbed by the body through different routes of exposure. Hawaii Department of Health EAL Table and U.S. EPA RSL Table have recommended dermal and gastro-intestinal absorption fractions for different compounds. This risk assessment utilized these fractions for the direct contact oral and dermal pathways. For the inhalation pathway the most conservative default value of 1 was assumed for these fractions meaning the entire concentration of chemicals would be available for absorption by the body. More realistic bioaccessible fractions for this pathway could be derived and would most likely reduce the portrayed risk in this assessment.

4.3 Exposure Assessment

During the exposure assessment, exposure point concentrations are estimated, and exposure doses are calculated. Exposure point concentrations are the estimated concentrations of compounds to which humans may be exposed. Because ambient air chemical concentrations do not exist at the remote receptor locations at levels which would most likely exceed analytical detection limits, and direct measurement of would be confounded by non-relevant sources,

exposure point concentrations were estimated using models containing numerous assumptions, such as the amount of compound released from the site, the dispersion of the compound in air and its fate and transport in the environment, and the location of people potentially exposed to released compounds. Once the concentrations in an environmental medium such as air have been predicted, the calculation of human exposure and dose involves making additional assumptions. The major sources of uncertainty associated with these assumptions are discussed below.

4.3.1 Estimation of Particulate Emission Factors

Offsite concentrations of COPCs for this risk assessment were either derived from a single ambient air-monitoring event. Maximum dust monitored during this event was used to model fugitive dust concentration to offsite receptors. This assumption is extremely health-protective because it most certainly would overestimate the amount of dust that could result from ash handling operations to occur on site. For example, the particulate emission factor was derived from the PM₁₀ concentration from the location with the maximum particulate reading. Had the average at all monitoring locations been used, PM₁₀ concentrations would have been significantly lower. Similarly, the PM₁₀ concentration was also monitored using real time personal data rams (PDR). The average PM₁₀ concentration over the course of the day from the PDR was significantly lower than the measured PM₁₀ concentration from the air pumps. To be health protective, the cassette data from the active air sampling was carried forward in the human health risk assessment. Use of the PDR data would significantly lower the quantified human health risks.

4.3.2 Estimation of Airborne Dust Concentrations Offsite

There is some uncertainty in the estimation of airborne dust concentrations, because the risk assessment does not separately consider dust concentrations on days when winds are high. This uncertainty is minimal, however, as described below. The current risk assessment utilizes an EPA screening air dispersion model that assumes winds are blowing towards residential receptors 24 hours a day, 365 days a year at 2.8 m/s for either a 1-year or 30-year period. The USEPA states that a 0.08 times multiplication factor should be used to convert the 1-hr maximum average to an annual average. This was not done in this evaluation. Instead, an adjustment factor of 0.2 was applied to estimate the annual average (personal communication with Dr. Barbara Brooks, HEER

Office). Had a more realistic air dispersion model been used, the ambient dust concentrations at remote receptor locations would have been lower.

4.3.3 Estimation of Exposure Dose

Exposure point concentrations are estimated values of what is a Reasonable Maximum Exposure across the entire site. Given that these are estimates, a significant amount of uncertainty can be introduced into the assessment. A 95% UCL was used as the exposure point concentration in AES coal ash. Implementation of the 95% UCL estimates that the value calculated is greater than or equal to the true mean 95% of the time when calculated for a random data set. This assumption therefore introduces significant uncertainty as it relates to the true risk and almost certainly overestimates both site concentrations and risk. Additional uncertainty is also introduced by assuming non-detect laboratory results as present at $\frac{1}{2}$ the sample reporting limit. In reality this may over or under estimate the actual concentration of the contaminant in the sample. As analytical methods have a limit to their accuracy at very low concentrations, this introduces uncertainty in the assessment.

Once the concentrations of the potentially released compounds in air have been predicted through modeling, the extent of human exposure must be estimated. This requires making assumptions about the frequency and duration of human exposure.

Uncertainty may be associated with some of the assumptions used to estimate how often exposure occurs. Such assumptions include location, accessibility, and use of an area. With this in mind, the receptor, or person who may potentially be exposed, and the location of exposure were defined for this risk assessment. The locations where certain activities were assumed to take place have been purposely selected because chemical concentrations and frequency of exposure are expected to be high (i.e., use of the maximally affected areas). In this assessment, residential receptors were assumed to live in the neighboring communities for 30 years and be present 24 hours per day, 350 days per year. The workers were assumed to be present at the site 8 hours per day, 250 days per year, and have a employment tenure of 25 years. However, actual frequencies and durations of exposure are likely to be much lower than assumed, because residents are not likely to stay in one place and may, for instance, work far away or move to another location. Furthermore the remaining lifetime of the landfill will probably not approach the estimated duration of lifetime, residence, or employment. In these cases, the person's potential exposure would be reduced, and the health risks discussed in this assessment would be overestimated.

4.4 Risk Characterization

The risk of adverse human health effects depends on estimated levels of exposure and dose-response relationships. Once exposure to and risk from each of the selected compounds is calculated, the total risk posed by disposal operations is determined by combining the health risk contributed by each compound. For virtually all combinations of compounds present in chemicals evaluated in this assessment, there is little or no evidence of interaction. However, in order not to understate the risk, it is assumed that the effects of different compounds may be added together.

SECTION 5 REFERENCES

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APPENDIX A

Ambient Air Monitoring Field Notes

PVT Dust Monitoring

- 1050- Up wind location cassettes (PVT-U-PM10, PVT-U-TD) and dataRam set up and activated to run until EOD.
- 1110- Sampling cassettes PVT-D1-PM10 and PVT- D1-TD set up about 20-25 feet SE from ash pile and activated near beginning of ash dump.
- 1115- Rover (Amec dataRam) activated about 35 feet SE of ash pile.
- 1135- Ash Dump. Wind strong to east.
- 1145- D1 off.
- 1150- Moved Rover 20' east and 10' north.
- 1158- D2 (PVT-D2-PM10 and PVT- D2-TD) set up and awaiting ash dump.
- 1203- Dozer piling ash pile.
- 1208- Dozer pau.
- ****- dataRam at D2 had pump turned off after D1 sampling.
- 1230- dataRam at D2 pump turned on.
- 1245- Moved Rover ~25' south (wind direction a steady SE). Checked on upwind pumps-OK.
- ****- Debris trucks deliver and dump debris all day. Water truck waters various areas of road and debris pile all day.
- 1312- ash truck onsite. Samplers at D2 turned on.
- 1315- ash dump. Could not get attention of spotter. Other vehicles onsite continue to work while ash is dumped. Wind still towards SE.
- 1325- D2 samplers off.
- 1330- D3 (PVT-D2-PM10 and PVT- D2-TD) samplers set up. Solid SE winds.
- 1349- Moved Rover 20' south.
- 1350- ash truck onsite.
- 1351- pumps at D3 on.
- 1405- pumps off. dataRam left on. Debris trucks continue to dump and the water truck continues to make its rounds.
- 1428- ash truck dumps.
- 1431- debris pile capping begins.
- 1435- Debris pile capping samplers (PVT-End Cap-PM10 and PVT- End Cap-TD) turned on.
- 1542- Moved samplers to north side due to steady north wind.
- 1545- Upwind samplers uprighted.
- 1547- Rover to north side
- 1555- capping is pau. Samplers off. MB de-mobs and offsite.

On October 26, 2009, Amec performed air monitoring and sampling for Total Dust and Respirable Dust (PM10) at the PVT Land Company Landfill, Nanakuli, Hawaii. Inalab Laboratory of Honolulu provided Amec with pre-weighed 37mm PVC cassettes installed with 0.8um MCE filters. Sampling consisted of two (2) pre-weighed cassettes, each attached by tubing to a personal pump. One of the two cassettes was fitted into a Gilian Cyclone cassette holder that separates respirable dust from particulate matter of 10 microns or more and the other cassette drew unfiltered air to collect total dust. Both samples were collected at a rate of 1.7 L/min. Monitoring of respirable dust consisted of a personal pump attached to a Thermo Electro Corporation personal DataRam 1200 (pDR 1200) with cyclone attachment. Air was pumped through the pDR 1200 at the rate of 1.2L/min. per manufacturer's instructions for PM10 monitoring. Sampling and monitoring coincided with 3 ash deliveries and the capping of the debris pile at EOD. Samples and air monitoring data were collected at five (5) pre-determined locations:

1. Upwind of the ash pile, approximately 500' E side. (Samples PVT-U-TD, PVT-U-PM10)
2. Adjacent to the ash pile, SE side. (Samples PVT-D1-TD, PVT-D1-PM10)
3. Approximately 20' above the debris pile, W side. (Samples PVT-D2-TD, PVT-D2-PM10)
4. Approximately 100' above the debris pile on upper soil plateau, W side. (Samples PVT-D3-TD, PVT-D3-PM10)
5. Adjacent to the ash pile during EOD capping of the debris pile, SE and N side. (Samples PVT-End Cap-TD, PVT-End Cap-PM10)

In addition to the 5 pre-determined locations, a pDR 1200 monitor measured the concentration of respirable dust from various downwind locations onsite.

Sample collection times are as follows:

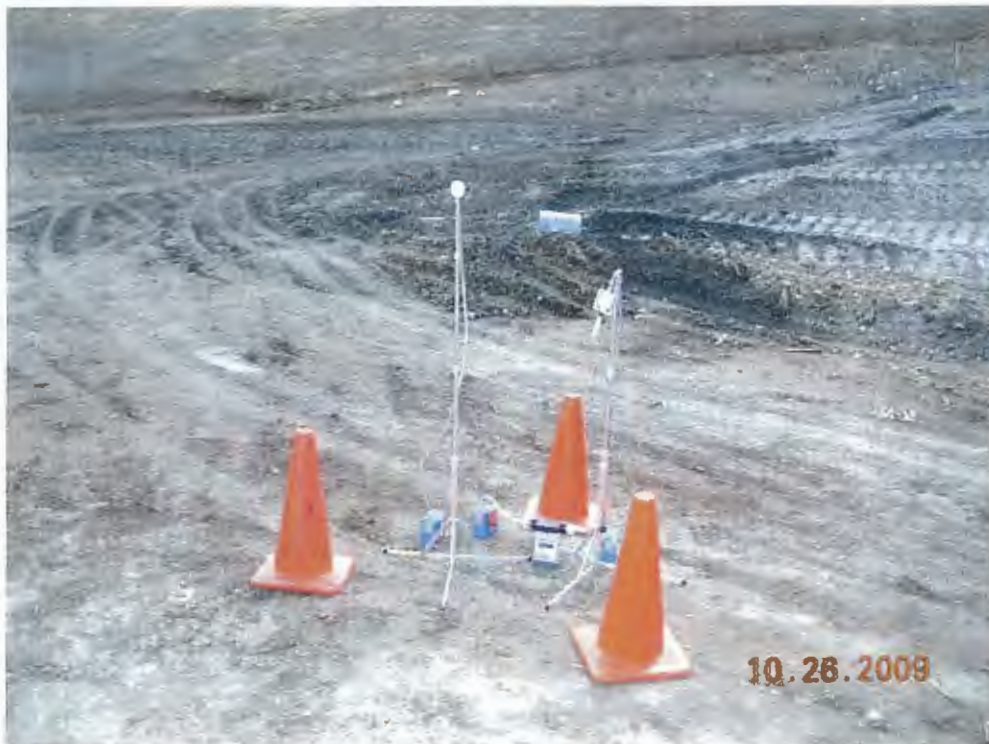
1. Upwind: 1050-1555
2. D1: 1110-1145
3. D2: 1158-1208
4. D3: 1351-1405
5. End Cap: 1435-1555

The End Cap sample was collected from two locations according to the wind direction.

The pictures are provided and show sampling locations

APPENDIX B

Ambient Air Monitoring Photographs







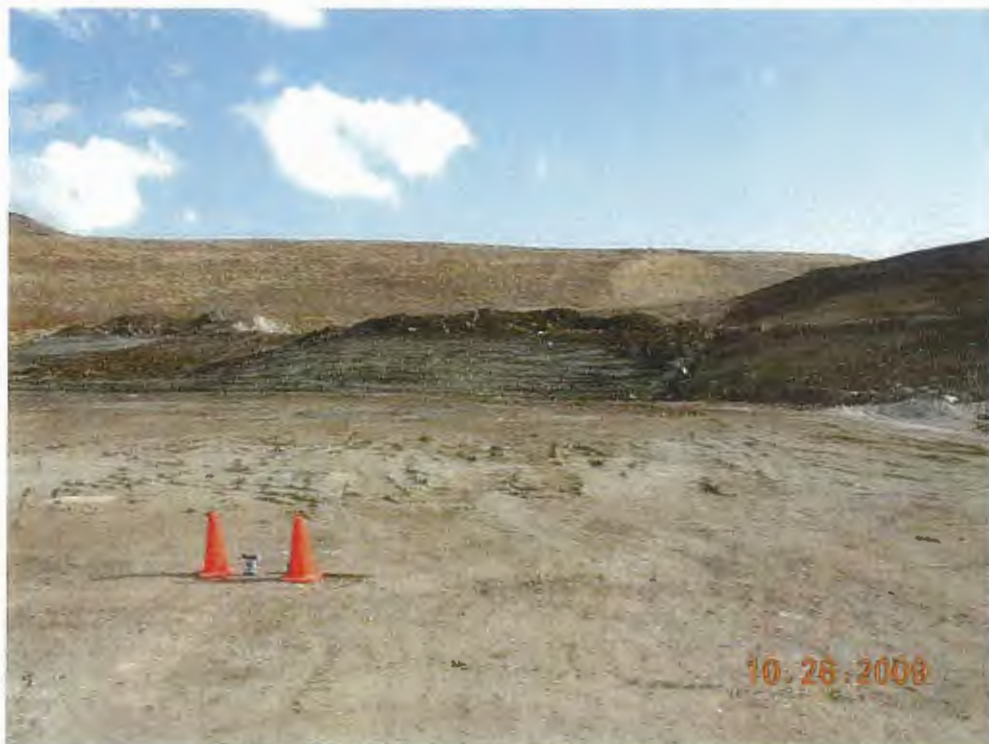












APPENDIX C

Ambient Air Monitoring Analytical Results



INALAB, Inc.

**LABORATORY DIVISION
ANALYTICAL REPORT**

30 October 2009

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Analytical Results

INALAB JOB NO: 20092608

CLIENT REFERENCE: PVT Landfill - 947/000002.0002 (10/26/09) - Total Dust

Air-Total Nuisance Dust

NIOSH INALAB NO	Method: 0500(mod) Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20091027021	01. PVT-D1 PM10: ASH PILE (Pre-weighed Cassette)	UNK	0.3	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027022	02. PVT-D1 TD: ASH PILE (Pre-weighed Cassette)	UNK	0.76	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027023	03. PVT-D2 PM10: ROAD ABOVE ASH PILE (Pre-weighed Cassette)	UNK	0.59	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027024	04. PVT-D2 TD: ROAD ABOVE ASH PILE (Pre-weighed Cassette)	UNK	0.82	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027025	05. PVT-D3 PM10: High Area Above ASH PILE (Pre-weighed Cassette)	UNK	0.34	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027026	06. PVT-D3 TD: High Area Above ASH PILE (Pre-weighed Cassette)	UNK	0.92	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027027	07. PVT-U- PM10: EAST of ASH PILE (Pre-weighed Cassette)	UNK	0.05	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027028	08. PVT-U-TD: EAST of ASH PILE (Pre-weighed Cassette)	UNK	0.62	mg/m3	10/27/09	10/29/09
REMARKS:						

INALAB, Inc. is an AIHA IHLAP ACCREDITED LABORATORY (Accreditation No. 101812) with scope of accreditation including metals, solvents, fiber counts and bulk asbestos. INALAB, Inc. is a participant in the Compressed Air Proficiency Test (CAPT) program.

30 October 2009

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Mr. Russell Okoji
AMEC Earth & Environmental
3049 Ualena Street
Suite 1100
Honolulu HI 96819

Phone Number (808) 545-2462
Facsimile: (808) 528-5379

Analytical Results

INALAB JOB NO: 20092608

CLIENT REFERENCE: PVT Landfill - 947/000002.0002 (10/26/09) - Total Dust

Air-Total Nuisance Dust

NIOSH INALAB NO	Method: 0500(mod) Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20091027029	09. PVT-End Cap - PM10: ASH PILE (Pre-weighed Cassette)	UNK	1.1	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027030	10. PVT-End Cap - TD: ASH PILE (Pre-weighed Cassette)	UNK	4.6	mg/m3	10/27/09	10/29/09
REMARKS:						
20091027256	Blank 1	UNK	< 0.01	mg/filter	10/27/09	10/29/09
REMARKS:						
20091027257	Blank 2	UNK	< 0.01	mg/filter	10/27/09	10/29/09
REMARKS:						

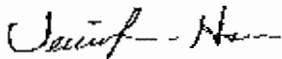
BATCH QC/QA

Analyte Recovery (%): 100

Precision (% RPD): N/A

System Blank Acceptable

All analysts participate in interlaboratory quality control testing to continuously document proficiency. *The sample(s) analysis(es) subject of this analytical report was (were) conducted in general accordance with the procedures associated with the "analytical method" referenced above. Modifications to this methodology may have been made based upon the analyst's professional judgment and / or sample matrix effects encountered. 1. The analysis of sample relates only to the sample analyzed, and may or may not be representative of the original source of the material submitted for our analysis. 2. UNK refers to the sample submitted for this evaluation/ analysis. 3. DUP means a duplicate analysis of the Unk sample. 4. REP refers to a second preparation of the Unk sample. 5. Tr means TRACE, i.e., the analyte of interest was, to a reasonable degree of scientific certainty present, but was BELOW the quantifiable limits of this determination (stated). 6. ">" means greater than the numerical value listed. 7. "<" means less than the numerical value listed. 8. ND = NOT DETECTED which means the analyte, if present below our stated detection limit/ level. 9. RPD = Relative Percent Deviation $[(\text{unk-dup})/(\text{ave}(\text{unk}, \text{dup}))]*100$. 10. This report is not to be duplicated except in full without the expressed written permission of INALAB, Inc. 11. This report should not be construed as an endorsement for a product or a service by the AIHA or any affiliated organizations. 12. Sample and associated sampling/ collection data is reported as provided by client. 13. For air samples, results are calculated based on the reported air volumes. 14. Analytical methods marked with an "#" are not within our AIHA Scope of Accreditation. 15. Results have not been corrected for blank determinations unless noted in remarks.



DID INALAB FORENSIC DIVISION COLLECT THESE SAMPLES? **No**

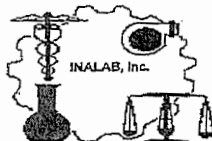
Approved Signatory
Laboratory Manager

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INALAB, Inc.

Experts in Environmental, Forensic, Occupational and Laboratory Services

OFFICIAL LABORATORY CHAIN OF CUSTODY



Analysis Company Name: **INALAB, Inc.**
Street Address: 3615 Harding Avenue, Suite 308
City/State/Zip: Honolulu, HI 96816
Telephone No: (808) 735-0422 FAX: (808) 735-0047

Please Do Not Write in Shaded Areas. Thank you :-)

INALAB JOB #: **2009**

INALAB CLIENT I.D.#:

"TAT" (Turn-Around-Time)	
<input checked="" type="checkbox"/>	3-5 Work DAYS (standard)
<input type="checkbox"/>	2 Work DAYS
<input type="checkbox"/>	Priority (1 Work DAY)
<input type="checkbox"/>	Rush (< 1 Work Day)
<input type="checkbox"/>	Immediate: 4 Hours

Date:

10-27-09

Inalab's CLIENT/Co. Name:

AMEC E+E

Telephone Number:

808 783-6840

Project Name / Job #:

PVT Landfill
94710000020002

Delivered By (print name):

Mark Bigelow

INALAB Sample NUMBER(s) This Column For INALAB Use Only	Your Sample No./I.D.	Client's Sampling Location	Client's Sample DESCRIPTION	Date / Time Collected	SAMPLE MATRIX	Client: Please State Your Required ANALYSIS	AIR VOLUME
	PVT-D1 PM10	Ash pile	pre-weighed	10/26/09, 1110-1145	Dust	PM 10	59.5 L/min
	PVT-D1 TD	"	Cassette	"	"	Niosh Total dust	"
	PVT-D2 PM10	Road above ash pile	"	1158-11208	"	PM 10	17 L/min
	PVT-D2 TD	"	"	"	"	Niosh Total dust	"
	PVT-D3 PM10	High area above ash pile	"	11351-11405	"	PM 10	23.8 L/min
	PVT-D3 TD	"	"	"	"	Niosh Total dust	"
	PVT-U- PM10	East of Ash Pile	"	1050-11555	"	PM 10	518.5 L/min
	PVT-U- TD	"	"	"	"	Niosh Total dust	"
	PVT-End Cap-PM10	Ash Pile	"	11435-11555	"	PM 10	34 L/min
	PVT-End Cap-TD	"	"	"	"	Niosh Total dust	"
Relinquished By: (Signature)	Date	Time	Received By: (Signature)	Date	Time		
x Mark Bigelow	10/27/09	1105	x [Signature]	10/27/09	1105		
x			x				
x			x				
Send Report To: E-MAIL Address OR	Number	SAMPLE NO(s):					
<input type="checkbox"/> rachel.okoji@amec.com							
SPECIAL NOTATION: TAT Note: If sample(s) are received after 9:00 A.M., that day will not count as a TAT day. Thank you for your support.							
Please include 2 pre-weighed cassettes for Blank analysis.							

Received Via: PICK-UP ☐ ROP BOX ☐ FAX ☐ USPS ☐
UPS ☐ Office D/O ☒

Copy of "COC" YES ☐ NO ☐

pDR-1000 S/N: 06082
User ID: 6114
Tag Number: 01
Number of logged points: 577
Start time and date: 18:08:09 07-Mar
Elapsed time: 04:48:30
Logging period (sec): 30
Calibration Factor (%): 100
Max Display Concentration: 1.670 mg/m³
Time at maximum: 18:44:10 Mar 07
Max STEL Concentration: 0.138 mg/m³
Time at max STEL: 18:46:09 Mar 07
Overall Avg Conc: 0.044 mg/m³

Logged Data:

Point,	Date ,	Time ,	Avg. (mg/m ³)
1,	07 Mar,	18:08:39,	0.027
2,	07 Mar,	18:09:09,	0.022
3,	07 Mar,	18:09:39,	0.021
4,	07 Mar,	18:10:09,	0.038
5,	07 Mar,	18:10:39,	0.034
6,	07 Mar,	18:11:09,	0.029
7,	07 Mar,	18:11:39,	0.025
8,	07 Mar,	18:12:09,	0.022
9,	07 Mar,	18:12:39,	0.022
10,	07 Mar,	18:13:09,	0.023
11,	07 Mar,	18:13:39,	0.019
12,	07 Mar,	18:14:09,	0.020
13,	07 Mar,	18:14:39,	0.023
14,	07 Mar,	18:15:09,	0.030
15,	07 Mar,	18:15:39,	0.027
16,	07 Mar,	18:16:09,	0.023
17,	07 Mar,	18:16:39,	0.024
18,	07 Mar,	18:17:09,	0.030
19,	07 Mar,	18:17:39,	0.023
20,	07 Mar,	18:18:09,	0.061
21,	07 Mar,	18:18:39,	0.041
22,	07 Mar,	18:19:09,	0.026
23,	07 Mar,	18:19:39,	0.037
24,	07 Mar,	18:20:09,	0.134
25,	07 Mar,	18:20:39,	0.052
26,	07 Mar,	18:21:09,	0.038
27,	07 Mar,	18:21:39,	0.056
28,	07 Mar,	18:22:09,	0.049
29,	07 Mar,	18:22:39,	0.054
30,	07 Mar,	18:23:09,	0.044
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32,	07 Mar,	18:24:09,	0.055
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36,	07 Mar,	18:26:09,	0.095
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45,	07 Mar,	18:30:39,	0.063
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47,	07 Mar,	18:31:39,	0.023
48,	07 Mar,	18:32:09,	0.029
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53,	07 Mar,	18:34:39,	0.062
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01-2-3-End cap

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327, 07 Mar, 20:51:39, 0.027
328, 07 Mar, 20:52:09, 0.025
329, 07 Mar, 20:52:39, 0.021
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345, 07 Mar, 21:00:39, 0.037

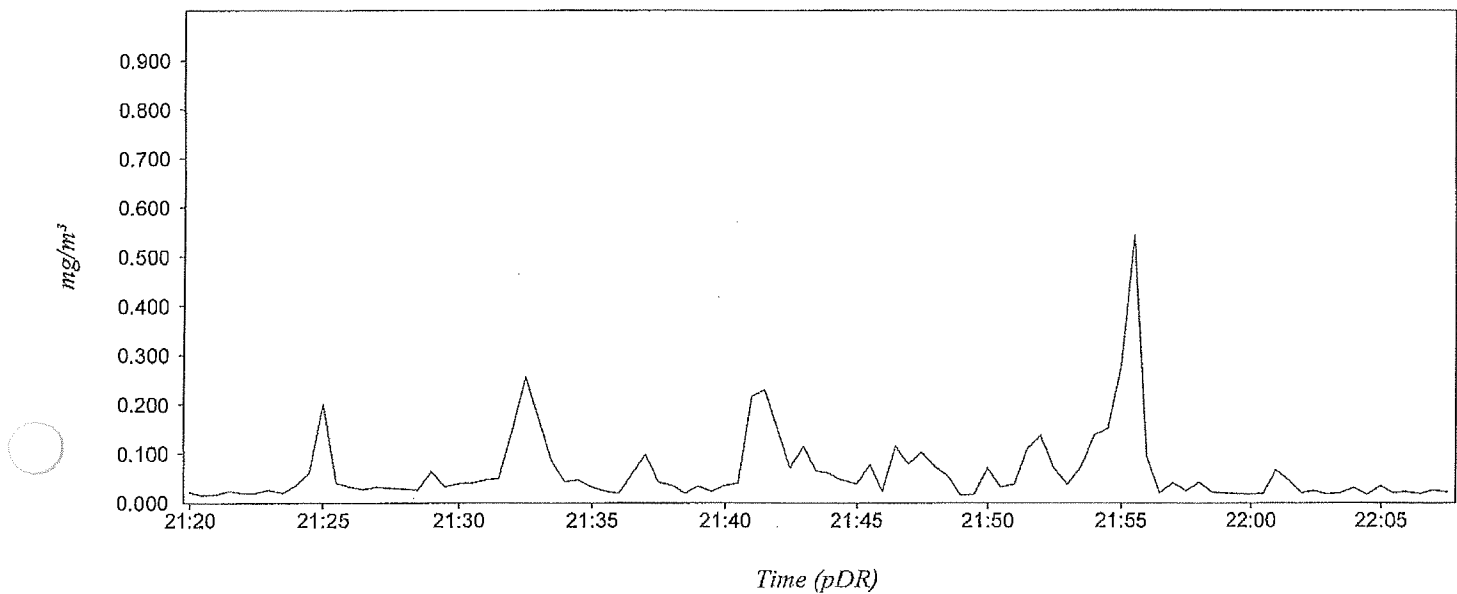
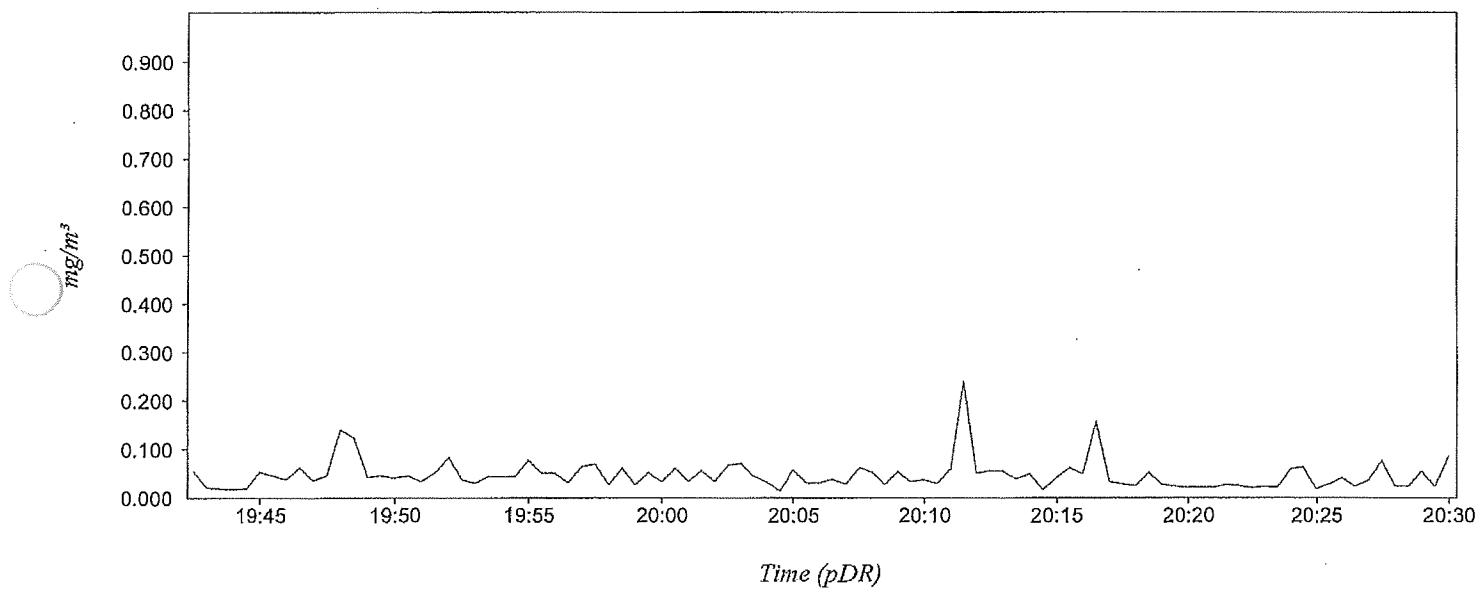
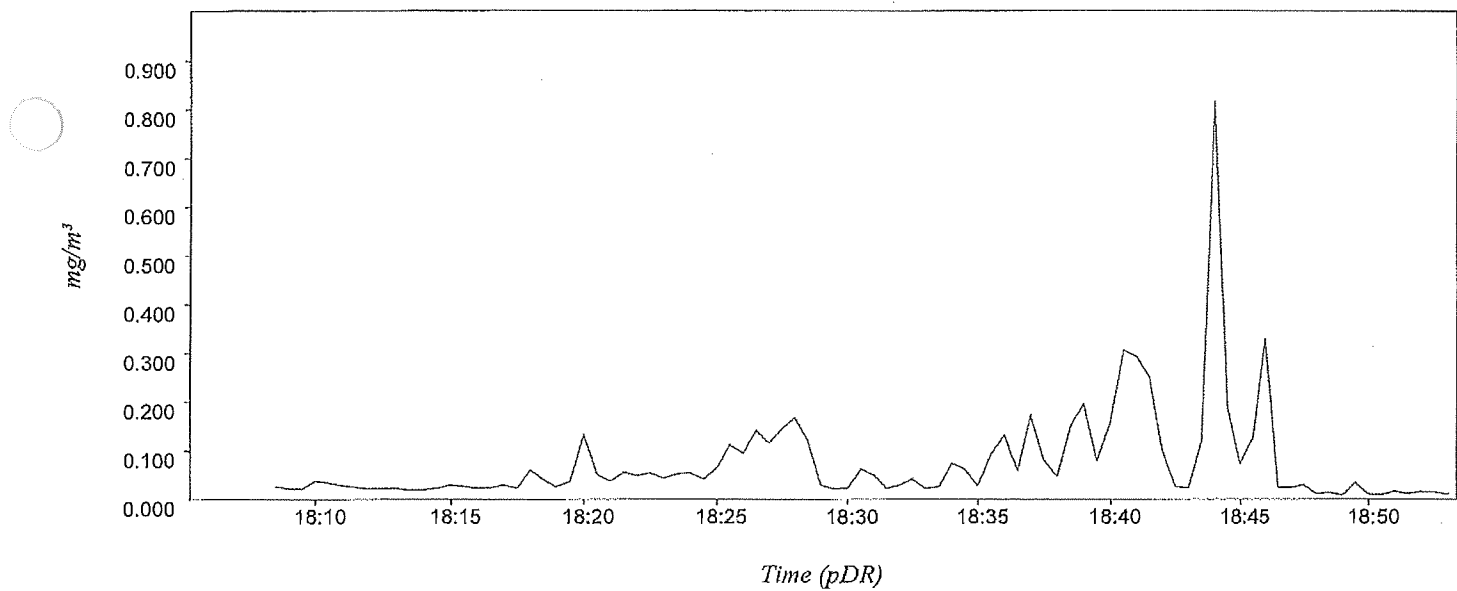
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352,	07 Mar,	21:04:09,	0.037
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372,	07 Mar,	21:14:09,	0.071
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574, 07 Mar, 22:55:09, 0.035
575, 07 Mar, 22:55:39, 0.027
576, 07 Mar, 22:56:09, 0.059
577, 07 Mar, 22:56:39, 0.080

pDR-1000 S/N: 06082 / Tag # 01 / Start time: Mar 07, 18:08:09



pDR-1000 S/N: 06082

User ID: 6082

Tag Number: 01

Number of logged points: 620

Start time and date: 19:02:25 07-Mar

Elapsed time: 05:10:00

Logging period (sec): 30

Calibration Factor (%): 100

Max Display Concentration: 2.880 mg/m³

Time at maximum: 21:30:52 Mar 07

Max STEL Concentration: 0.105 mg/m³

Time at max STEL: 21:42:55 Mar 07

Overall Avg Conc: 0.055 mg/m³

Logged Data:

Point, Date, Time, Avg. (mg/m³)

1,	07 Mar,	19:02:55,	0.011
2,	07 Mar,	19:03:25,	0.023
3,	07 Mar,	19:03:55,	0.009
4,	07 Mar,	19:04:25,	0.018
5,	07 Mar,	19:04:55,	0.020
6,	07 Mar,	19:05:25,	0.038
7,	07 Mar,	19:05:55,	0.047
8,	07 Mar,	19:06:25,	0.040
9,	07 Mar,	19:06:55,	0.028
10,	07 Mar,	19:07:25,	0.020
11,	07 Mar,	19:07:55,	0.016
12,	07 Mar,	19:08:25,	0.017
13,	07 Mar,	19:08:55,	0.018
14,	07 Mar,	19:09:25,	0.019
15,	07 Mar,	19:09:55,	0.015
16,	07 Mar,	19:10:25,	0.014
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20,	07 Mar,	19:12:25,	0.012
21,	07 Mar,	19:12:55,	0.013
22,	07 Mar,	19:13:25,	0.011
23,	07 Mar,	19:13:55,	0.012
24,	07 Mar,	19:14:25,	0.013
25,	07 Mar,	19:14:55,	0.017
26,	07 Mar,	19:15:25,	0.020
27,	07 Mar,	19:15:55,	0.015
28,	07 Mar,	19:16:25,	0.011
29,	07 Mar,	19:16:55,	0.014
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37,	07 Mar,	19:20:55,	0.013
38,	07 Mar,	19:21:25,	0.018
39,	07 Mar,	19:21:55,	0.012
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43,	07 Mar,	19:23:55,	0.011
44,	07 Mar,	19:24:25,	0.016
45,	07 Mar,	19:24:55,	0.050
46,	07 Mar,	19:25:25,	0.076
47,	07 Mar,	19:25:55,	0.031
48,	07 Mar,	19:26:25,	0.020
49,	07 Mar,	19:26:55,	0.016
50,	07 Mar,	19:27:25,	0.011
51,	07 Mar,	19:27:55,	0.017
52,	07 Mar,	19:28:25,	0.016
53,	07 Mar,	19:28:55,	0.022
54,	07 Mar,	19:29:25,	0.023
55,	07 Mar,	19:29:55,	0.012
56,	07 Mar,	19:30:25,	0.009
57,	07 Mar,	19:30:55,	0.014

upwind

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203,	07	Mar,	20:43:55,	0.019
204,	07	Mar,	20:44:25,	0.032
205,	07	Mar,	20:44:55,	0.019
206,	07	Mar,	20:45:25,	0.100
207,	07	Mar,	20:45:55,	0.118
208,	07	Mar,	20:46:25,	0.083
209,	07	Mar,	20:46:55,	0.091
210,	07	Mar,	20:47:25,	0.056
211,	07	Mar,	20:47:55,	0.064
212,	07	Mar,	20:48:25,	0.077
213,	07	Mar,	20:48:55,	0.046
214,	07	Mar,	20:49:25,	0.019
215,	07	Mar,	20:49:55,	0.123
216,	07	Mar,	20:50:25,	0.073
217,	07	Mar,	20:50:55,	0.123
218,	07	Mar,	20:51:25,	0.044
219,	07	Mar,	20:51:55,	0.054
220,	07	Mar,	20:52:25,	0.050
221,	07	Mar,	20:52:55,	0.049
222,	07	Mar,	20:53:25,	0.061
223,	07	Mar,	20:53:55,	0.046
224,	07	Mar,	20:54:25,	0.052
225,	07	Mar,	20:54:55,	0.032
226,	07	Mar,	20:55:25,	0.046
227,	07	Mar,	20:55:55,	0.055
228,	07	Mar,	20:56:25,	0.178
229,	07	Mar,	20:56:55,	0.022
230,	07	Mar,	20:57:25,	0.134
231,	07	Mar,	20:57:55,	0.063
232,	07	Mar,	20:58:25,	0.052
233,	07	Mar,	20:58:55,	0.023
234,	07	Mar,	20:59:25,	0.023
235,	07	Mar,	20:59:55,	0.021
236,	07	Mar,	21:00:25,	0.023
237,	07	Mar,	21:00:55,	0.026
238,	07	Mar,	21:01:25,	0.022
239,	07	Mar,	21:01:55,	0.082
240,	07	Mar,	21:02:25,	0.042
241,	07	Mar,	21:02:55,	0.043
242,	07	Mar,	21:03:25,	0.058
243,	07	Mar,	21:03:55,	0.077
244,	07	Mar,	21:04:25,	0.137
245,	07	Mar,	21:04:55,	0.052
246,	07	Mar,	21:05:25,	0.040
247,	07	Mar,	21:05:55,	0.037
248,	07	Mar,	21:06:25,	0.085
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250,	07	Mar,	21:07:25,	0.107
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252,	07	Mar,	21:08:25,	0.066
253,	07	Mar,	21:08:55,	0.421
254,	07	Mar,	21:09:25,	0.217
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256,	07	Mar,	21:10:25,	0.212
257,	07	Mar,	21:10:55,	0.073
258,	07	Mar,	21:11:25,	0.085
259,	07	Mar,	21:11:55,	0.046
260,	07	Mar,	21:12:25,	0.032
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262,	07	Mar,	21:13:25,	0.040
263,	07	Mar,	21:13:55,	0.081
264,	07	Mar,	21:14:25,	0.063
265,	07	Mar,	21:14:55,	0.135
266,	07	Mar,	21:15:25,	0.139
267,	07	Mar,	21:15:55,	0.039
268,	07	Mar,	21:16:25,	0.035
269,	07	Mar,	21:16:55,	0.059
270,	07	Mar,	21:17:25,	0.033
271,	07	Mar,	21:17:55,	0.042
272,	07	Mar,	21:18:25,	0.070
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287, 07 Mar, 21:25:55, 0.031
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296, 07 Mar, 21:30:25, 0.044
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298, 07 Mar, 21:31:25, 0.063
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308, 07 Mar, 21:36:25, 0.040
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345, 07 Mar, 21:54:55, 0.030

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349,	07	Mar,	21:56:55,	0.030
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357,	07	Mar,	22:00:55,	0.032
358,	07	Mar,	22:01:25,	0.030
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391,	07	Mar,	22:17:55,	0.027
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393,	07	Mar,	22:18:55,	0.026
394,	07	Mar,	22:19:25,	0.030
395,	07	Mar,	22:19:55,	0.038
396,	07	Mar,	22:20:25,	0.033
397,	07	Mar,	22:20:55,	0.028
398,	07	Mar,	22:21:25,	0.027
399,	07	Mar,	22:21:55,	0.030
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401,	07	Mar,	22:22:55,	0.032
402,	07	Mar,	22:23:25,	0.028
403,	07	Mar,	22:23:55,	0.031
404,	07	Mar,	22:24:25,	0.031
405,	07	Mar,	22:24:55,	0.029
406,	07	Mar,	22:25:25,	0.027
407,	07	Mar,	22:25:55,	0.037
408,	07	Mar,	22:26:25,	0.026
409,	07	Mar,	22:26:55,	0.030
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431, 07 Mar, 22:37:55, 0.063
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486, 07 Mar, 23:05:25, 0.120
487, 07 Mar, 23:05:55, 0.115
488, 07 Mar, 23:06:25, 0.202
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493,	07	Mar,	23:08:55,	0.034
494,	07	Mar,	23:09:25,	0.076
495,	07	Mar,	23:09:55,	0.038
496,	07	Mar,	23:10:25,	0.032
497,	07	Mar,	23:10:55,	0.044
498,	07	Mar,	23:11:25,	0.030
499,	07	Mar,	23:11:55,	0.038
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502,	07	Mar,	23:13:25,	0.071
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511,	07	Mar,	23:17:55,	0.072
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513,	07	Mar,	23:18:55,	0.047
514,	07	Mar,	23:19:25,	0.043
515,	07	Mar,	23:19:55,	0.034
516,	07	Mar,	23:20:25,	0.034
517,	07	Mar,	23:20:55,	0.037
518,	07	Mar,	23:21:25,	0.036
519,	07	Mar,	23:21:55,	0.044
520,	07	Mar,	23:22:25,	0.036
521,	07	Mar,	23:22:55,	0.033
522,	07	Mar,	23:23:25,	0.034
523,	07	Mar,	23:23:55,	0.037
524,	07	Mar,	23:24:25,	0.119
525,	07	Mar,	23:24:55,	0.038
526,	07	Mar,	23:25:25,	0.032
527,	07	Mar,	23:25:55,	0.041
528,	07	Mar,	23:26:25,	0.037
529,	07	Mar,	23:26:55,	0.082
530,	07	Mar,	23:27:25,	0.034
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532,	07	Mar,	23:28:25,	0.032
533,	07	Mar,	23:28:55,	0.034
534,	07	Mar,	23:29:25,	0.039
535,	07	Mar,	23:29:55,	0.035
536,	07	Mar,	23:30:25,	0.043
537,	07	Mar,	23:30:55,	0.038
538,	07	Mar,	23:31:25,	0.039
539,	07	Mar,	23:31:55,	0.060
540,	07	Mar,	23:32:25,	0.047
541,	07	Mar,	23:32:55,	0.040
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546,	07	Mar,	23:35:25,	0.037
547,	07	Mar,	23:35:55,	0.038
548,	07	Mar,	23:36:25,	0.043
549,	07	Mar,	23:36:55,	0.035
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553,	07	Mar,	23:38:55,	0.033
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559,	07	Mar,	23:41:55,	0.047
560,	07	Mar,	23:42:25,	0.035
561,	07	Mar,	23:42:55,	0.037

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563,	07 Mar,	23:43:55,	0.036
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566,	07 Mar,	23:45:25,	0.032
567,	07 Mar,	23:45:55,	0.029
568,	07 Mar,	23:46:25,	0.030
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571,	07 Mar,	23:47:55,	0.035
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573,	07 Mar,	23:48:55,	0.031
574,	07 Mar,	23:49:25,	0.028
575,	07 Mar,	23:49:55,	0.029
576,	07 Mar,	23:50:25,	0.029
577,	07 Mar,	23:50:55,	0.031
578,	07 Mar,	23:51:25,	0.031
579,	07 Mar,	23:51:55,	0.046
580,	07 Mar,	23:52:25,	0.067
581,	07 Mar,	23:52:55,	0.047
582,	07 Mar,	23:53:25,	0.051
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584,	07 Mar,	23:54:25,	0.041
585,	07 Mar,	23:54:55,	0.041
586,	07 Mar,	23:55:25,	0.039
587,	07 Mar,	23:55:55,	0.046
588,	07 Mar,	23:56:25,	0.042
589,	07 Mar,	23:56:55,	0.040
590,	07 Mar,	23:57:25,	0.042
591,	07 Mar,	23:57:55,	0.038
592,	07 Mar,	23:58:25,	0.042
593,	07 Mar,	23:58:55,	0.042
594,	07 Mar,	23:59:25,	0.037
595,	07 Mar,	23:59:55,	0.040
596,	08 Mar,	00:00:25,	0.044
597,	08 Mar,	00:00:55,	0.037
598,	08 Mar,	00:01:25,	0.050
599,	08 Mar,	00:01:55,	0.078
600,	08 Mar,	00:02:25,	0.039
601,	08 Mar,	00:02:55,	0.061
602,	08 Mar,	00:03:25,	0.041
603,	08 Mar,	00:03:55,	0.033
604,	08 Mar,	00:04:25,	0.035
605,	08 Mar,	00:04:55,	0.035
606,	08 Mar,	00:05:25,	0.035
607,	08 Mar,	00:05:55,	0.041
608,	08 Mar,	00:06:25,	0.032
609,	08 Mar,	00:06:55,	0.037
610,	08 Mar,	00:07:25,	0.034
611,	08 Mar,	00:07:55,	0.031
612,	08 Mar,	00:08:25,	0.032
613,	08 Mar,	00:08:55,	0.032
614,	08 Mar,	00:09:25,	0.039
615,	08 Mar,	00:09:55,	0.409
616,	08 Mar,	00:10:25,	0.065
617,	08 Mar,	00:10:55,	0.064
618,	08 Mar,	00:11:25,	0.053
619,	08 Mar,	00:11:55,	0.048
620,	08 Mar,	00:12:25,	0.040

mg/m³

0.000 0.400 0.800 1.200 1.600

07-Mar 19:05
07-Mar 19:10
07-Mar 19:15
07-Mar 19:20
07-Mar 19:25
07-Mar 19:30
07-Mar 19:35
07-Mar 19:40
07-Mar 19:45

Date & Time (pDR)

mg/m³

0.000 0.400 0.800 1.200 1.600

07-Mar 20:20
07-Mar 20:25
07-Mar 20:30
07-Mar 20:35
07-Mar 20:40
07-Mar 20:45
07-Mar 20:50
07-Mar 20:55
07-Mar 21:00
07-Mar 21:05

Date & Time (pDR)

mg/m³

0.000 0.400 0.800 1.200 1.600

07-Mar 21:40
07-Mar 21:45
07-Mar 21:50
07-Mar 21:55
07-Mar 22:00
07-Mar 22:05
07-Mar 22:10
07-Mar 22:15
07-Mar 22:20

Date & Time (pDR)

mg/m³

0.000 0.400 0.800 1.200 1.600

07-Mar 22:55
07-Mar 23:00
07-Mar 23:05
07-Mar 23:10
07-Mar 23:15
07-Mar 23:20
07-Mar 23:25
07-Mar 23:30
07-Mar 23:35
07-Mar 23:40

Date & Time (pDR)

pDR-1000 S/N: 05567

User ID: 5338

Tag Number: 01

Number of logged points: 569

Start time and date: 19:18:59 07-Mar

Elapsed time: 04:44:30

Logging period (sec): 30

Calibration Factor (%): 100

Max Display Concentration: 3.584 mg/m³

Time at maximum: 21:47:01 Mar 07

Max STEL Concentration: 0.164 mg/m³

Time at max STEL: 20:03:29 Mar 07

Overall Avg Conc: 0.051 mg/m³

Logged Data:

Point, Date, Time, Avg. (mg/m³)

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2,	07 Mar,	19:19:59,	0.012
3,	07 Mar,	19:20:29,	0.012
4,	07 Mar,	19:20:59,	0.011
5,	07 Mar,	19:21:29,	0.011
6,	07 Mar,	19:21:59,	0.010
7,	07 Mar,	19:22:29,	0.011
8,	07 Mar,	19:22:59,	0.015
9,	07 Mar,	19:23:29,	0.013
10,	07 Mar,	19:23:59,	0.011
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15,	07 Mar,	19:26:29,	0.030
16,	07 Mar,	19:26:59,	0.010
17,	07 Mar,	19:27:29,	0.024
18,	07 Mar,	19:27:59,	0.022
19,	07 Mar,	19:28:29,	0.011
20,	07 Mar,	19:28:59,	0.050
21,	07 Mar,	19:29:29,	0.055
22,	07 Mar,	19:29:59,	0.032
23,	07 Mar,	19:30:29,	0.029
24,	07 Mar,	19:30:59,	0.020
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26,	07 Mar,	19:31:59,	0.027
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43,	07 Mar,	19:40:29,	0.015
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47,	07 Mar,	19:42:29,	0.035
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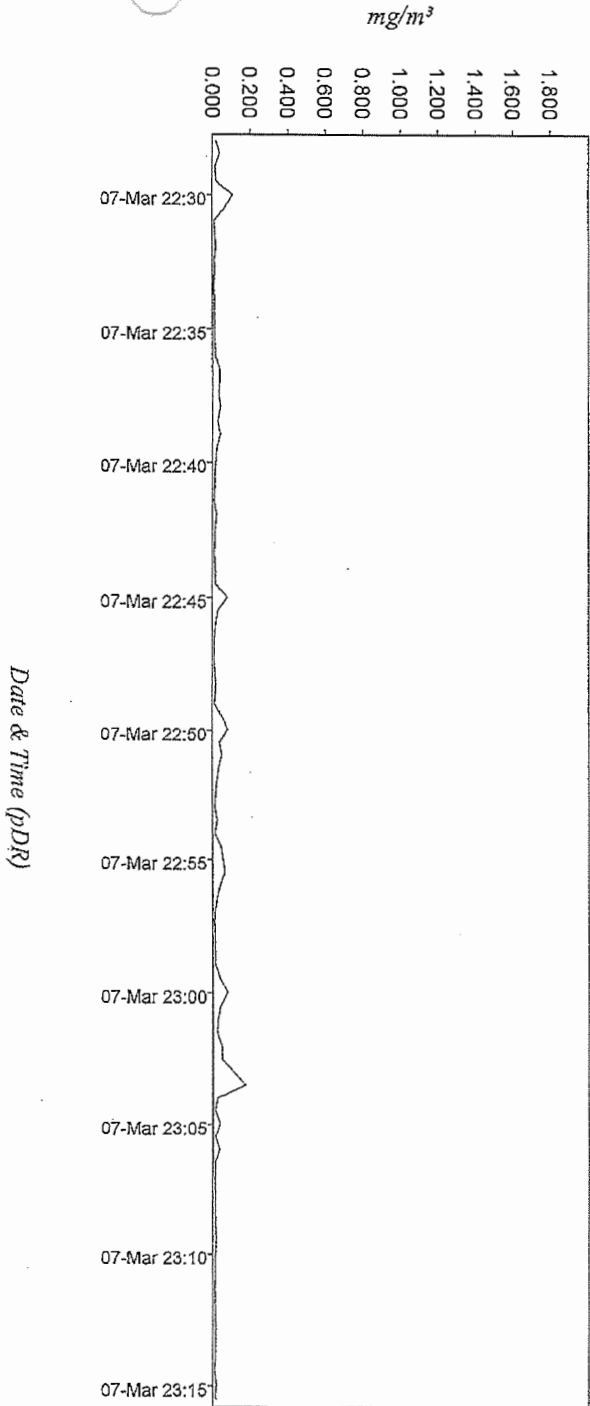
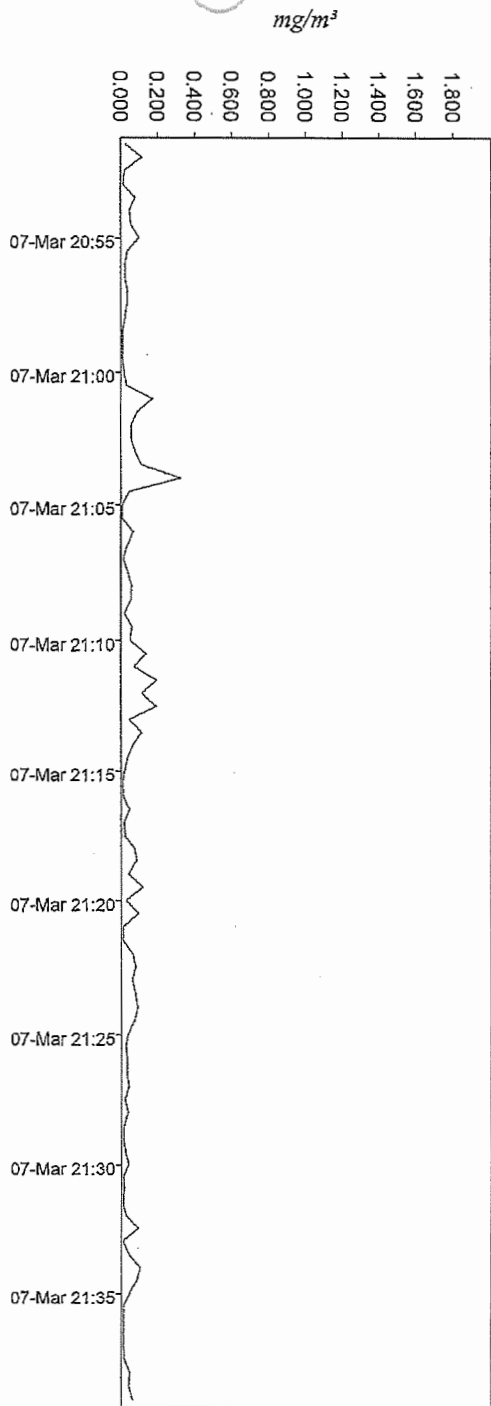
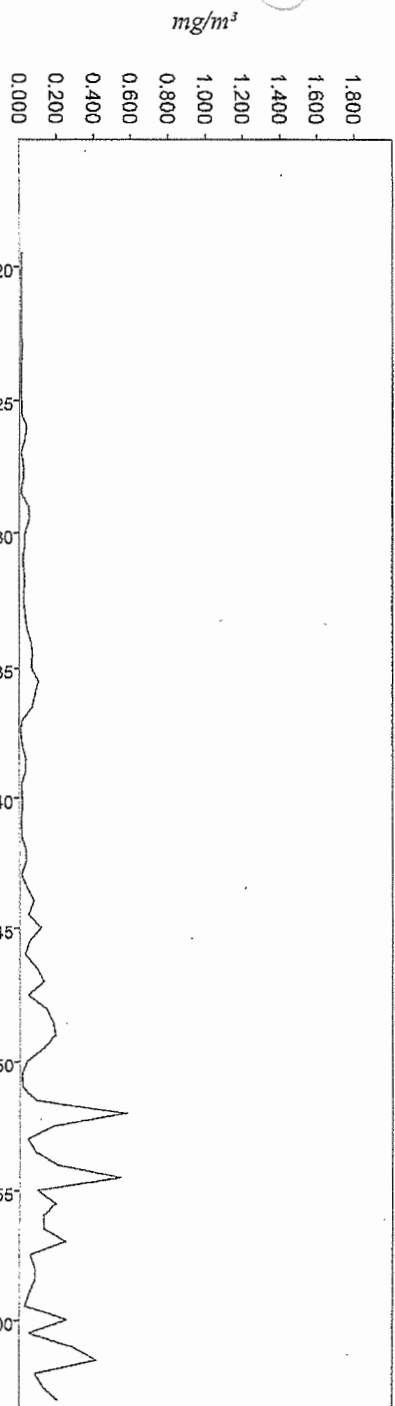
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456, 07 Mar, 23:06:59, 0.010
457, 07 Mar, 23:07:29, 0.009
458, 07 Mar, 23:07:59, 0.010
459, 07 Mar, 23:08:29, 0.011
460, 07 Mar, 23:08:59, 0.013
461, 07 Mar, 23:09:29, 0.015
462, 07 Mar, 23:09:59, 0.012
463, 07 Mar, 23:10:29, 0.011
464, 07 Mar, 23:10:59, 0.010
465, 07 Mar, 23:11:29, 0.007
466, 07 Mar, 23:11:59, 0.009
467, 07 Mar, 23:12:29, 0.011
468, 07 Mar, 23:12:59, 0.013
469, 07 Mar, 23:13:29, 0.013
470, 07 Mar, 23:13:59, 0.012
471, 07 Mar, 23:14:29, 0.007
472, 07 Mar, 23:14:59, 0.015
473, 07 Mar, 23:15:29, 0.012
474, 07 Mar, 23:15:59, 0.011
475, 07 Mar, 23:16:29, 0.010
476, 07 Mar, 23:16:59, 0.019
477, 07 Mar, 23:17:29, 0.024
478, 07 Mar, 23:17:59, 0.024
479, 07 Mar, 23:18:29, 0.014
480, 07 Mar, 23:18:59, 0.021
481, 07 Mar, 23:19:29, 0.012
482, 07 Mar, 23:19:59, 0.010
483, 07 Mar, 23:20:29, 0.011
484, 07 Mar, 23:20:59, 0.014
485, 07 Mar, 23:21:29, 0.016
486, 07 Mar, 23:21:59, 0.011
487, 07 Mar, 23:22:29, 0.009
488, 07 Mar, 23:22:59, 0.011
489, 07 Mar, 23:23:29, 0.012

490, 07 Mar, 23:23:59, 0.012
491, 07 Mar, 23:24:29, 0.014
492, 07 Mar, 23:24:59, 0.009
493, 07 Mar, 23:25:29, 0.015
494, 07 Mar, 23:25:59, 0.015
495, 07 Mar, 23:26:29, 0.009
496, 07 Mar, 23:26:59, 0.011
497, 07 Mar, 23:27:29, 0.015
498, 07 Mar, 23:27:59, 0.011
499, 07 Mar, 23:28:29, 0.009
500, 07 Mar, 23:28:59, 0.009
501, 07 Mar, 23:29:29, 0.009
502, 07 Mar, 23:29:59, 0.039
503, 07 Mar, 23:30:29, 0.031
504, 07 Mar, 23:30:59, 0.007
505, 07 Mar, 23:31:29, 0.051
506, 07 Mar, 23:31:59, 0.062
507, 07 Mar, 23:32:29, 0.011
508, 07 Mar, 23:32:59, 0.012
509, 07 Mar, 23:33:29, 0.012
510, 07 Mar, 23:33:59, 0.012
511, 07 Mar, 23:34:29, 0.010
512, 07 Mar, 23:34:59, 0.013
513, 07 Mar, 23:35:29, 0.013
514, 07 Mar, 23:35:59, 0.015
515, 07 Mar, 23:36:29, 0.011
516, 07 Mar, 23:36:59, 0.008
517, 07 Mar, 23:37:29, 0.008
518, 07 Mar, 23:37:59, 0.008
519, 07 Mar, 23:38:29, 0.011
520, 07 Mar, 23:38:59, 0.013
521, 07 Mar, 23:39:29, 0.009
522, 07 Mar, 23:39:59, 0.012
523, 07 Mar, 23:40:29, 0.009
524, 07 Mar, 23:40:59, 0.008
525, 07 Mar, 23:41:29, 0.009
526, 07 Mar, 23:41:59, 0.007
527, 07 Mar, 23:42:29, 0.007
528, 07 Mar, 23:42:59, 0.008
529, 07 Mar, 23:43:29, 0.008
530, 07 Mar, 23:43:59, 0.007
531, 07 Mar, 23:44:29, 0.012
532, 07 Mar, 23:44:59, 0.014
533, 07 Mar, 23:45:29, 0.007
534, 07 Mar, 23:45:59, 0.010
535, 07 Mar, 23:46:29, 0.013
536, 07 Mar, 23:46:59, 0.020
537, 07 Mar, 23:47:29, 0.007
538, 07 Mar, 23:47:59, 0.005
539, 07 Mar, 23:48:29, 0.007
540, 07 Mar, 23:48:59, 0.008
541, 07 Mar, 23:49:29, 0.008
542, 07 Mar, 23:49:59, 0.009
543, 07 Mar, 23:50:29, 0.006
544, 07 Mar, 23:50:59, 0.006
545, 07 Mar, 23:51:29, 0.008
546, 07 Mar, 23:51:59, 0.008
547, 07 Mar, 23:52:29, 0.014
548, 07 Mar, 23:52:59, 0.011
549, 07 Mar, 23:53:29, 0.123
550, 07 Mar, 23:53:59, 0.038
551, 07 Mar, 23:54:29, 0.034
552, 07 Mar, 23:54:59, 0.133
553, 07 Mar, 23:55:29, 0.008
554, 07 Mar, 23:55:59, 0.013
555, 07 Mar, 23:56:29, 0.021
556, 07 Mar, 23:56:59, 0.010
557, 07 Mar, 23:57:29, 0.015
558, 07 Mar, 23:57:59, 0.016
559, 07 Mar, 23:58:29, 0.012
560, 07 Mar, 23:58:59, 0.016
561, 07 Mar, 23:59:29, 0.028

562,	07 Mar,	23:59:59,	0.006
563,	08 Mar,	00:00:29,	0.011
564,	08 Mar,	00:00:59,	0.017
565,	08 Mar,	00:01:29,	0.007
566,	08 Mar,	00:01:59,	0.008
567,	08 Mar,	00:02:29,	0.016
568,	08 Mar,	00:02:59,	0.014
569,	08 Mar,	00:03:29,	0.010



APPENDIX D

AES Ash Analytical Results Table

AES Hawaii, Inc. Conditioned Ash Results and Statistics

Composite Sample Limit	Sb (Antimony) mg/kg 31	As (Arsenic) mg/kg 75	Ba (Barium) mg/kg 5400	Be (Beryllium) mg/kg 150	B (Boron) mg/kg 12000	Cd (Cadmium) mg/kg 37
17-3-1-1	0.741	23.8	1060	2.25	1030	ND 0.608
17-3-1-2	1.20	27.1	1450	3.33	716	ND 0.678
17-3-2-1	0.519	16.3	462	ND 4.90	1100	ND 0.490
17-3-2-2	ND 0.631	18.5	517	ND 12.6	1020	ND 0.631
17-3-3-1	ND 0.515	18.1	326	ND 2.58	766	ND 0.515
17-3-3-2	ND 0.727	13.9	797	1.54	1170	ND 0.727
17-4-4-1	ND 0.634	16.4	873	1.62	830	ND 0.634
17-4-4-2	ND 0.66	10.6	442	1.02	660	ND 0.661
17-4-5-1	0.219	14.7	806	2.16	863	0.542
17-4-5-2	ND 0.515	11.7	1250	1.5	297	0.603
17-4-6-1	ND 0.706	11.5	535	0.96	513	ND 0.706
17-4-6-2	ND 0.495	16.0	893	ND 2.48	528	0.520
18-1-7-1	ND 0.485	14.9	587	ND 2.43	521	ND 0.485
18-1-7-2	ND 0.628	9.91	400	ND 6.28	385	ND 0.628
18-1-8-1	ND 6.25	10.8	424	ND 6.25	534	ND 6.25
18-1-8-2	ND 6.47	16.4	560	ND 6.47	515	ND 6.47
18-1-9-1	0.780	14.4	540	ND 0.678	562	ND 0.678
18-1-9-2	ND 0.698	18.1	556	ND 6.98	596	ND 0.698
18-2-10-1	ND 0.695	17.9	485	ND 6.95	653	ND 0.695
18-2-10-2	ND 0.661	14.1	445	1.63	616	ND 0.661
18-2-11-1	ND 0.635	21.7	431	2.53	490	ND 0.64
18-2-11-2	ND 1.35	21.4	495	2.20	859	ND 0.68
18-2-12-1	0.506	28.8	421	5.06	659	ND 0.126
18-2-12-2	0.184	23.7	318	4.90	451	ND 0.134
18-3-1-1	0.990	9.2	1310	1.73	151	ND 0.115
18-3-1-2	1.200	29.2	735	6.80	492	ND 1.150
18-3-2-1	1.330	23.5	791	4.20	404	ND 1.08
18-3-2-2	ND 0.86	15.0	193	3.59	188	ND 0.86
18-3-3-1	ND 0.856	14.9	333	3.19	488	ND 0.856
18-3-3-2	ND 1.100	9.9	407	2.45	372	ND 1.100
18-4-4-1	0.395	10.9	369	1.05	500	ND 0.21
18-4-4-2	0.178	12.0	386	2.71	528	ND 0.28
18-4-5-1	ND 0.254	6.7	288	1.39	426	ND 0.25
18-4-5-2	ND 0.203	2.5	334	1.24	360	ND 0.20
18-4-6-1	ND 0.282	7.6	493	4.05	921	ND 0.28
18-4-6-2	0.344	11.3	347	1.41	658	ND 0.25
19-1-7-1	ND 0.262	14.9	446	2.02	955	ND 0.26
19-1-7-2	0.313	45.0	908	7.86	2190	ND 0.29
19-1-8-1	ND 0.286	12.5	280	2.37	699	ND 0.29
19-1-8-2	ND 0.287	22.7	484	3.55	1140	ND 0.29
19-1-9-1	ND 0.288	13.2	470	2.72	1200	ND 0.29
19-1-9-2	ND 0.233	11.3	317	1.24	574	ND 0.23
Mean +95% Confidence	0.75	18.6	661	3.22	791	0.62

AES Hawaii, Inc. Conditioned Ash Results and Statistics

Composite Sample Limit	Cr (Chromium) mg/kg 58	Cu (Copper) mg/kg 3100	Fe (Iron) mg/kg N/A	Pb (Lead) mg/kg 400	Hg (Mercury) mg/kg 13	Mo (Molybdenum) mg/kg 390
17-3-1-1	36.5	32.8	26300	18.2		9.88
17-3-1-2	30.2	39.3	26000	28.6	ND	12.0
17-3-2-1	27.7	24.1	28800	14.9		6.01
17-3-2-2	29.2	21.1	31800	14.8		ND
17-3-3-1	25.7	16.2	31000	10.0		4.67
17-3-3-2	35.3	31.9	28500	16.3		7.20
17-4-4-1	35.3	25.8	27300	17.1		6.84
17-4-4-2	17.1	14.5	22400	9.85		4.28
17-4-5-1	33.1	29.9	18800	18.1		7.84
17-4-5-2	23.3	20.9	10900	17.2		6.84
17-4-6-1	16.5	14.8	17900	7.1		3.83
17-4-6-2	22.8	22.2	17700	13.0		7.87
18-1-7-1	19.0	18.6	19600	11.0		6.56
18-1-7-2	32.9	28.5	15800	12.8		3.29
18-1-8-1	33.4	42.1	17200	18.0	ND	ND
18-1-8-2	36.9	41.5	18500	15.1	ND	ND
18-1-9-1	33.9	40.0	27100	20.3		4.94
18-1-9-2	34.7	36.8	34500	24.7		5.43
18-2-10-1	32.4	30.0	38000	23.5		4.71
18-2-10-2	32.6	33.5	30900	25.7		4.01
18-2-11-1	37.8	37.3	29700	21.2	ND	6.86
18-2-11-2	31.4	34.8	32600	16.7		6.95
18-2-12-1	34.6	49.1	28700	33.3		9.37
18-2-12-2	32.2	50.4	21000	33.9		6.19
18-3-1-1	47.1	59.8	17000	18.5		2.28
18-3-1-2	36.5	54.1	16200	36.2	ND	4.82
18-3-2-1	50.3	34.0	12400	15.1	ND	4.03
18-3-2-2	25.5	35.8	11300	35.4	ND	4.53
18-3-3-1	45.8	34.3	13400	12.9	ND	4.36
18-3-3-2	73.3	25.7	16000	14.9	ND	4.00
18-4-4-1	33.2	28.5	21000	20.5		3.93
18-4-4-2	36.0	39.2	16900	25.1		2.68
18-4-5-1	22.1	30.9	12600	15.1		2.84
18-4-5-2	22.0	30.0	11700	17.5		0.98
18-4-6-1	41.4	37.6	10600	17.5		3.57
18-4-6-2	36.5	27.5	12000	11.6		3.50
19-1-7-1	57.8	29.2	24600	19.0		4.19
19-1-7-2	240.0	54.1	58600	51.5		10.50
19-1-8-1	85.2	23.3	23700	14.0		4.27
19-1-8-2	40.4	28.1	30400	17.1	ND	6.87
19-1-9-1	43.1	47.3	31200	20.1		7.50
19-1-9-2	14.3	17.8	19900	13.7		3.12
Mean +95% Confidence	50.6	36.1	25795	22.1	0.413	6.90

AES Hawaii, Inc. Conditioned Ash Results and Statistics

Composite Sample Limit	Ni (Nickel) mg/kg 1600	Se (Selenium) mg/kg 390	Ag (Silver) mg/kg 390	Tl (Thallium) mg/kg 5.2	Zn (Zinc) mg/kg 23000
17-3-1-1	50.2	1.88	ND	0.608	800
17-3-1-2	28.7	2.42	ND	0.678	659
17-3-2-1	34.3	1.60	ND	0.490	463
17-3-2-2	32.7	1.66	ND	0.631	212
17-3-3-1	30.2	1.17	ND	0.515	105
17-3-3-2	44.7	2.84	ND	0.727	98
17-4-4-1	38.8	2.60	ND	0.634	502
17-4-4-2	22.5	1.50	ND	0.661	301
17-4-5-1	47.3	4.82		0.212	315
17-4-5-2	24.5	3.56	ND	0.515	84.8
17-4-6-1	21.6	1.90	ND	0.706	93.1
17-4-6-2	28.3	3.62	ND	0.495	293
18-1-7-1	23.7	2.30	ND	0.485	379
18-1-7-2	43.8	1.48	ND	0.628	276
18-1-8-1	51.4	ND	6.25	ND	414
18-1-8-2	53.0	ND	6.47	ND	607
18-1-9-1	48.5	2.30	ND	0.678	959
18-1-9-2	45.2	2.38	ND	0.698	787
18-2-10-1	41.0	2.07	ND	0.695	688
18-2-10-2	39.3	2.16	ND	0.661	330
18-2-11-1	50.5	2.83	ND	0.64	143
18-2-11-2	44.3	1.89	ND	0.68	565
18-2-12-1	54.7	2.23		0.259	707
18-2-12-2	64.8	1.78	ND	0.134	457
18-3-1-1	69.2	ND	0.12	ND	88.3
18-3-1-2	45.8	2.07		2.280	465
18-3-2-1	81.1	ND	1.08	ND	287
18-3-2-2	28.4	1.89	ND	0.86	176
18-3-3-1	122	ND	0.86	ND	370
18-3-3-2	134.0	ND	1.10	ND	177
18-4-4-1	54.5		0.30	2.280	905
18-4-4-2	40.7		0.09	ND	479
18-4-5-1	35.5		0.43		830
18-4-5-2	40.6		0.45		272
18-4-6-1	60.7		0.53		331
18-4-6-2	49.0		0.40		263
19-1-7-1	116.0		0.61	ND	871
19-1-7-2	609	ND	0.29		1630
19-1-8-1	236.0	ND	0.29		146
19-1-8-2	63.3		0.88	ND	895
19-1-9-1	122		0.78	ND	1670
19-1-9-2	29.8		0.86	ND	779
Mean +95% Confidence	98.4	1.99	0.796	0.66	612

AES Hawaii, Inc. Conditioned Ash Results and Statistics

Composite Sample Limit	Sb (Antimony) mg/kg 31	As (Arsenic) mg/kg 75	Ba (Barium) mg/kg 5400	Be (Beryllium) mg/kg 150	B (Boron) mg/kg 12000	Cd (Cadmium) mg/kg 37
17-3-1-1	0.741	23.8	1060	2.25	1030	0.30
17-3-1-2	1.200	27.1	1450	3.33	716	0.34
17-3-2-1	0.519	16.3	462	2.45	1100	0.25
17-3-2-2	0.316	18.5	517	6.30	1020	0.32
17-3-3-1	0.258	18.1	326	1.29	766	0.26
17-3-3-2	0.364	13.9	797	1.54	1170	0.36
17-4-4-1	0.317	16.4	873	1.62	830	0.32
17-4-4-2	0.331	10.6	442	1.02	660	0.33
17-4-5-1	0.219	14.7	806	2.16	863	0.54
17-4-5-2	0.258	11.7	1250	1.48	297	0.60
17-4-6-1	0.353	11.5	535	0.96	513	0.35
17-4-6-2	0.248	16.0	893	1.24	528	0.52
18-1-7-1	0.243	14.9	587	1.22	521	0.24
18-1-7-2	0.314	9.9	400	3.14	385	0.31
18-1-8-1	3.125	10.8	424	3.13	534	3.13
18-1-8-2	3.235	16.4	560	3.24	515	3.24
18-1-9-1	0.780	14.4	540	0.34	562	0.34
18-1-9-2	0.349	18.1	556	3.49	596	0.35
18-2-10-1	0.348	17.9	485	3.48	653	0.35
18-2-10-2	0.331	14.1	445	1.63	616	0.33
18-2-11-1	0.318	21.7	431	2.53	490	0.32
18-2-11-2	0.675	21.4	495	2.20	859	0.34
18-2-12-1	0.506	28.8	421	5.06	659	0.06
18-2-12-2	0.184	23.7	318	4.90	451	0.07
18-3-1-1	0.990	9.2	1310	1.73	151	0.06
18-3-1-2	1.200	29.2	735	6.80	492	0.58
18-3-2-1	1.330	23.5	791	4.20	404	0.54
18-3-2-2	0.428	15.0	193	3.59	188	0.43
18-3-3-1	0.428	14.9	333	3.19	488	0.43
18-3-3-2	0.550	9.9	407	2.45	372	0.55
18-4-4-1	0.395	10.9	369	1.05	500	0.10
18-4-4-2	0.178	12.0	386	2.71	528	0.14
18-4-5-1	0.127	6.7	288	1.39	426	0.13
18-4-5-2	0.102	2.5	334	1.24	360	0.10
18-4-6-1	0.141	7.6	493	4.05	921	0.14
18-4-6-2	0.344	11.3	347	1.41	658	0.12
19-1-7-1	0.131	14.9	446	2.02	955	0.13
19-1-7-2	0.313	45.0	908	7.86	2190	0.14
19-1-8-1	0.143	12.5	280	2.37	699	0.14
19-1-8-2	0.144	22.7	484	3.55	1140	0.14
19-1-9-1	0.144	13.2	470	2.72	1200	0.14
19-1-9-2	0.117	11.3	317	1.24	574	0.12
Note: If the original composite sample was Non Detect, the assumed analytical value is 1/2 the detectable limit for that specific sample.						
Mean	0.541202	16.26262	570.5714	2.703548	680.4762	0.421321
Standard Error	0.103257	1.150265	44.86308	0.253415	54.53046	0.099213
Standard Deviation	0.669181	7.454568	290.746	1.642315	353.3977	0.642974
Sample Variance	0.447803	55.57058	84533.23	2.697197	124890	0.413415
Range	3.1335	42.46	1257	7.521	2039	3.1775
Minimum	0.1015	2.54	193	0.339	151	0.0575
Maximum	3.235	45	1450	7.86	2190	3.235
Count	42	42	42	42	42	42
Confidence Level(95.0%)	0.208532	2.323007	90.60283	0.511781	110.1265	0.200365

AES Hawaii, Inc. Conditioned Ash Results and Statistics

Composite Sample	Cr (Chromium) mg/kg Limit	Cu (Copper) mg/kg 3100	Fe (Iron) mg/kg N/A	Pb (Lead) mg/kg 400	Hg (Mercury) mg/kg 13	Mo (Molybdenum) mg/kg 390
17-3-1-1	36.5	32.8	26300	18.2	0.292	9.88
17-3-1-2	30.2	39.3	26000	28.6	0.046	12.00
17-3-2-1	27.7	24.1	28800	14.9	0.376	6.01
17-3-2-2	29.2	21.1	31800	14.8	0.430	1.58
17-3-3-1	25.7	16.2	31000	10.0	0.423	4.67
17-3-3-2	35.3	31.9	28500	16.3	0.329	7.20
17-4-4-1	35.3	25.8	27300	17.1	0.244	6.84
17-4-4-2	17.1	14.5	22400	9.9	0.335	4.28
17-4-5-1	33.1	29.9	18800	18.1	0.366	7.84
17-4-5-2	23.3	20.9	10900	17.2	0.303	6.84
17-4-6-1	16.5	14.8	17900	7.1	0.348	3.83
17-4-6-2	22.8	22.2	17700	13.0	0.472	7.87
18-1-7-1	19.0	18.6	19600	11.0	0.418	6.56
18-1-7-2	32.9	28.5	15800	12.8	0.282	3.29
18-1-8-1	33.4	42.1	17200	18.0	0.059	15.65
18-1-8-2	36.9	41.5	18500	15.1	0.059	16.15
18-1-9-1	33.9	40.0	27100	20.3	0.586	4.94
18-1-9-2	34.7	36.8	34500	24.7	0.613	5.43
18-2-10-1	32.4	30.0	38000	23.5	0.589	4.71
18-2-10-2	32.6	33.5	30900	25.7	0.305	4.01
18-2-11-1	37.8	37.3	29700	21.2	0.063	6.86
18-2-11-2	31.4	34.8	32600	16.7	0.262	6.95
18-2-12-1	34.6	49.1	28700	33.3	0.278	9.37
18-2-12-2	32.2	50.4	21000	33.9	0.336	6.19
18-3-1-1	47.1	59.8	17000	18.5	0.327	2.28
18-3-1-2	36.5	54.1	16200	36.2	0.575	4.82
18-3-2-1	50.3	34.0	12400	15.1	0.540	4.03
18-3-2-2	25.5	35.8	11300	35.4	0.428	4.53
18-3-3-1	45.8	34.3	13400	12.9	0.428	4.36
18-3-3-2	73.3	25.7	16000	14.9	0.550	4.00
18-4-4-1	33.2	28.5	21000	20.5	0.355	3.93
18-4-4-2	36.0	39.2	16900	25.1	0.438	2.68
18-4-5-1	22.1	30.9	12600	15.1	0.296	2.84
18-4-5-2	22.0	30.0	11700	17.5	0.337	0.98
18-4-6-1	41.4	37.6	10600	17.5	0.448	3.57
18-4-6-2	36.5	27.5	12000	11.6	0.261	3.50
19-1-7-1	57.8	29.2	24600	19.0	0.352	4.19
19-1-7-2	240.0	54.1	58600	51.5	0.939	10.50
19-1-8-1	85.2	23.3	23700	14.0	0.301	4.27
19-1-8-2	40.4	28.1	30400	17.1	0.144	6.87
19-1-9-1	43.1	47.3	31200	20.1	0.307	7.50
19-1-9-2	14.3	17.8	19900	13.7	0.332	3.12
Note: If the original composite sample was Non Detect, the assumed analytical value is 1/2 the detectable limit for that specific sample						
Mean	39.88095	32.69762	22869.05	19.45333	0.361182	5.879095
Standard Error	5.306354	1.693958	1448.955	1.318392	0.02588	0.506329
Standard Deviation	34.3891	10.9781	9390.303	8.54416	0.16772	3.281389
Sample Variance	1182.61	120.5188	88177799	73.00266	0.02813	10.76751
Range	225.7	45.3	48000	44.41	0.89335	15.168
Minimum	14.3	14.5	10600	7.09	0.04565	0.982
Maximum	240	59.8	58600	51.5	0.939	16.15
Count	42	42	42	42	42	42
Confidence Level(95.0%)	10.7164	3.421018	2926.225	2.662548	0.052265	1.022553

AES Hawaii, Inc. Conditioned Ash Results and Statistics

Composite Sample Limit	Ni (Nickel) mg/kg 1600	Se (Selenium) mg/kg 390	Ag (Silver) mg/kg 390	Tl (Thallium) mg/kg 5.2	Zn (Zinc) mg/kg 23000
17-3-1-1	50.2	1.88	0.304	0.61	800
17-3-1-2	28.7	2.42	0.339	0.34	659
17-3-2-1	34.3	1.60	0.245	0.25	463
17-3-2-2	32.7	1.66	0.316	0.32	212
17-3-3-1	30.2	1.17	0.258	0.26	105
17-3-3-2	44.7	2.84	0.364	0.36	98
17-4-4-1	38.8	2.60	0.317	0.32	502
17-4-4-2	22.5	1.50	0.331	0.33	301
17-4-5-1	47.3	4.82	0.212	0.75	315
17-4-5-2	24.5	3.56	0.258	0.60	85
17-4-6-1	21.6	1.90	0.353	0.36	93
17-4-6-2	28.3	3.62	0.248	0.84	293
18-1-7-1	23.7	2.30	0.243	0.70	379
18-1-7-2	43.8	1.48	0.314	0.31	276
18-1-8-1	51.4	3.13	3.125	0.56	414
18-1-8-2	53.0	3.24	3.235	0.19	607
18-1-9-1	48.5	2.30	0.339	0.20	959
18-1-9-2	45.2	2.38	0.349	0.56	787
18-2-10-1	41.0	2.07	0.348	1.74	688
18-2-10-2	39.3	2.16	0.331	0.73	330
18-2-11-1	50.5	2.83	0.318	0.51	143
18-2-11-2	44.3	1.89	0.338	0.34	565
18-2-12-1	54.7	2.23	0.259	0.49	707
18-2-12-2	64.8	1.78	0.067	0.46	457
18-3-1-1	69.2	0.06	0.058	0.97	88
18-3-1-2	45.8	2.07	2.280	1.19	465
18-3-2-1	81.1	0.54	0.540	0.54	287
18-3-2-2	28.4	1.89	0.428	0.43	176
18-3-3-1	122.0	0.43	0.428	0.43	370
18-3-3-2	134.0	0.55	0.550	0.55	177
18-4-4-1	54.5	0.30	2.280	0.61	905
18-4-4-2	40.7	0.09	0.698	0.68	479
18-4-5-1	35.5	0.43	0.405	0.42	830
18-4-5-2	40.6	0.45	0.273	0.53	272
18-4-6-1	60.7	0.53	0.402	0.47	331
18-4-6-2	49.0	0.40	0.528	0.33	263
19-1-7-1	116.0	0.61	0.131	0.63	871
19-1-7-2	609.0	0.14	1.050	1.65	1630
19-1-8-1	236.0	0.14	0.412	0.52	146
19-1-8-2	63.3	0.88	0.144	0.47	895
19-1-9-1	122.0	0.78	0.144	0.54	1670
19-1-9-2	29.8	0.86	0.117	0.53	779
Note: If the original composite sample was Non Detect, the assumed analytical value is 1/2 the detectable limit for that specific sample.					
Mean	69.08571	1.630857	0.563619	0.56244	496.9571
Standard Error	14.4981	0.176264	0.114921	0.050155	56.94404
Standard Deviation	93.95845	1.142318	0.744772	0.325041	369.0396
Sample Variance	8828.19	1.304892	0.554685	0.105651	136190.2
Range	587.4	4.7625	3.1775	1.541	1585.2
Minimum	21.6	0.0575	0.0575	0.194	84.8
Maximum	609	4.82	3.235	1.735	1670
Count	42	42	42	42	42
Confidence Level(95.0%)	29.27951	0.355971	0.232087	0.10129	115.0008

APPENDIX E

Statistical Analysis

General UCL Statistics for Full Data Sets

User Selected Options

From File	C:\Documents and Settings\vincent.yanagita\My Documents\Projects\pvt\Risk Assessment\2008 - 2009 Condition
Full Precision	OFF
Confidence Coefficient	95%
Number of Bootstrap Operations	2000

Sb (Antimony)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 38

Raw Statistics

Minimum 0.102

Maximum 3.235

Mean 0.541

Median 0.331

SD 0.669

Coefficient of Variation 1.236

Skewness 3.169

Log-transformed Statistics

Minimum of Log Data -2.288

Maximum of Log Data 1.174

Mean of log Data -1.013

SD of log Data 0.817

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.571

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.898

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 0.715

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 0.765

95% Modified-t UCL 0.723

Assuming Lognormal Distribution

95% H-UCL 0.668

95% Chebyshev (MVUE) UCL 0.81

97.5% Chebyshev (MVUE) UCL 0.944

99% Chebyshev (MVUE) UCL 1.206

Gamma Distribution Test

k star (bias corrected) 1.312

Theta Star 0.412

nu star 110.2

Approximate Chi Square Value (.05) 87.01

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 86.28

Anderson-Darling Test Statistic 2.106

Anderson-Darling 5% Critical Value 0.769

Kolmogorov-Smirnov Test Statistic 0.205

Kolmogorov-Smirnov 5% Critical Value 0.139

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 0.686

95% Adjusted Gamma UCL 0.692

Potential UCL to Use

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 0.711

95% Jackknife UCL 0.715

95% Standard Bootstrap UCL 0.711

95% Bootstrap-t UCL 0.871

95% Hall's Bootstrap UCL 1.515

95% Percentile Bootstrap UCL 0.719

95% BCA Bootstrap UCL 0.778

95% Chebyshev(Mean, Sd) UCL 0.991

97.5% Chebyshev(Mean, Sd) UCL 1.186

99% Chebyshev(Mean, Sd) UCL 1.569

Use 95% Chebyshev (Mean, Sd) UCL 0.991

As (Arsenic)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 37

Raw Statistics

Minimum 2.54
Maximum 45
Mean 16.26
Median 14.9
SD 7.455
Coefficient of Variation 0.458
Skewness 1.535

Log-transformed Statistics

Minimum of Log Data 0.932
Maximum of Log Data 3.807
Mean of log Data 2.689
SD of log Data 0.474

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.871
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.911
Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 18.2

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 18.45
95% Modified-t UCL 18.24

Assuming Lognormal Distribution

95% H-UCL 18.92

95% Chebyshev (MVUE) UCL 21.89
97.5% Chebyshev (MVUE) UCL 24.25
99% Chebyshev (MVUE) UCL 28.9

Gamma Distribution Test

k star (bias corrected) 4.808
Theta Star 3.382
nu star 403.9

Approximate Chi Square Value (.05) 358.3
Adjusted Level of Significance 0.0443
Adjusted Chi Square Value 356.8

Anderson-Darling Test Statistic 0.483

Anderson-Darling 5% Critical Value 0.752

Kolmogorov-Smirnov Test Statistic 0.101

Kolmogorov-Smirnov 5% Critical Value 0.137

Data appear Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 18.33

95% Adjusted Gamma UCL 18.41

Potential UCL to Use

Data Distribution

Data appear Gamma Distributed at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 18.15

95% Jackknife UCL 18.2

95% Standard Bootstrap UCL 18.14

95% Bootstrap-t UCL 18.58

95% Hall's Bootstrap UCL 18.93

95% Percentile Bootstrap UCL 18.17

95% BCA Bootstrap UCL 18.59

95% Chebyshev(Mean, Sd) UCL 21.28

97.5% Chebyshev(Mean, Sd) UCL 23.45

99% Chebyshev(Mean, Sd) UCL 27.71

Use 95% Approximate Gamma UCL 18.33

Ba (Barium)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 42

Raw Statistics

Minimum 193
Maximum 1450
Mean 570.6
Median 477
SD 290.7
Coefficient of Variation 0.51
Skewness 1.485

Log-transformed Statistics

Minimum of Log Data 5.263
Maximum of Log Data 7.279
Mean of log Data 6.241
SD of log Data 0.45

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.809
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.918
Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 646.1

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 655.3
95% Modified-t UCL 647.8

Assuming Lognormal Distribution

95% H-UCL 647.5

95% Chebyshev (MVUE) UCL 744.9
97.5% Chebyshev (MVUE) UCL 822
99% Chebyshev (MVUE) UCL 973.4

Gamma Distribution Test

k star (bias corrected) 4.573
Theta Star 124.8
nu star 384.1

Approximate Chi Square Value (.05) 339.7
Adjusted Level of Significance 0.0443
Adjusted Chi Square Value 338.2

Anderson-Darling Test Statistic 1.234
Anderson-Darling 5% Critical Value 0.752
Kolmogorov-Smirnov Test Statistic 0.17
Kolmogorov-Smirnov 5% Critical Value 0.137

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 645.2
95% Adjusted Gamma UCL 648

Potential UCL to Use

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 644.4
95% Jackknife UCL 646.1
95% Standard Bootstrap UCL 645.2
95% Bootstrap-t UCL 668
95% Hall's Bootstrap UCL 658.7
95% Percentile Bootstrap UCL 644.4
95% BCA Bootstrap UCL 655.8
95% Chebyshev(Mean, Sd) UCL 766.1
97.5% Chebyshev(Mean, Sd) UCL 850.7
99% Chebyshev(Mean, Sd) UCL 1017

Use 95% Student's-t UCL 646.1
or 95% Modified-t UCL 647.8

Be (Beryllium)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 39

Raw Statistics

Minimum 0.339

Maximum 7.86

Mean 2.704

Median 2.41

SD 1.642

Coefficient of Variation 0.607

Skewness 1.326

Log-transformed Statistics

Minimum of Log Data -1.082

Maximum of Log Data 2.062

Mean of log Data 0.82

SD of log Data 0.619

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.853

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.93

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 3.13

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 3.176

95% Modified-t UCL 3.139

Assuming Lognormal Distribution

95% H-UCL 3.331

95% Chebyshev (MVUE) UCL 3.956

97.5% Chebyshev (MVUE) UCL 4.484

99% Chebyshev (MVUE) UCL 5.522

Gamma Distribution Test

k star (bias corrected) 2.819

Theta Star 0.959

nu star 236.8

Approximate Chi Square Value (.05) 202.2

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 201

Anderson-Darling Test Statistic 0.356

Anderson-Darling 5% Critical Value 0.755

Kolmogorov-Smirnov Test Statistic 0.0865

Kolmogorov-Smirnov 5% Critical Value 0.137

Data appear Gamma Distributed at 5% Significance Level

Data Distribution

Data appear Gamma Distributed at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 3.12

95% Jackknife UCL 3.13

95% Standard Bootstrap UCL 3.121

95% Bootstrap-t UCL 3.236

95% Hall's Bootstrap UCL 3.222

95% Percentile Bootstrap UCL 3.12

95% BCA Bootstrap UCL 3.175

95% Chebyshev(Mean, Sd) UCL 3.808

97.5% Chebyshev(Mean, Sd) UCL 4.286

99% Chebyshev(Mean, Sd) UCL 5.225

Assuming Gamma Distribution

95% Approximate Gamma UCL 3.167

95% Adjusted Gamma UCL 3.184

Potential UCL to Use

Use 95% Approximate Gamma UCL 3.167

B (Boron)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 41

Raw Statistics

Minimum 151
Maximum 2190
Mean 680.5
Median 585
SD 353.4
Coefficient of Variation 0.519
Skewness 2.022

Log-transformed Statistics

Minimum of Log Data 5.017
Maximum of Log Data 7.692
Mean of log Data 6.408
SD of log Data 0.492

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.823
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.935
Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 772.2

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 788.3
95% Modified-t UCL 775.1

Assuming Lognormal Distribution

95% H-UCL 791.5
95% Chebyshev (MVUE) UCL 918.8
97.5% Chebyshev (MVUE) UCL 1021
99% Chebyshev (MVUE) UCL 1222

Gamma Distribution Test

k star (bias corrected) 4.198
Theta Star 162.1
nu star 352.7

Approximate Chi Square Value (.05) 310.2
Adjusted Level of Significance 0.0443
Adjusted Chi Square Value 308.7

Anderson-Darling Test Statistic 0.513
Anderson-Darling 5% Critical Value 0.752
Kolmogorov-Smirnov Test Statistic 0.106
Kolmogorov-Smirnov 5% Critical Value 0.137

Data appear Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 773.8
95% Adjusted Gamma UCL 777.3

Potential UCL to Use

Data Distribution

Data appear Gamma Distributed at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 770.2
95% Jackknife UCL 772.2
95% Standard Bootstrap UCL 766.9
95% Bootstrap-t UCL 799.9
95% Hall's Bootstrap UCL 831.3
95% Percentile Bootstrap UCL 769.7
95% BCA Bootstrap UCL 790.7
95% Chebyshev(Mean, Sd) UCL 918.2
97.5% Chebyshev(Mean, Sd) UCL 1021
99% Chebyshev(Mean, Sd) UCL 1223

Use 95% Approximate Gamma UCL 773.8

Cd (Cadmium)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 39

Raw Statistics

Minimum 0.0575

Maximum 3.235

Mean 0.421

Median 0.316

SD 0.643

Coefficient of Variation 1.526

Skewness 4.007

Log-transformed Statistics

Minimum of Log Data -2.856

Maximum of Log Data 1.174

Mean of log Data -1.32

SD of log Data 0.849

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.434

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 0.588

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 0.65

95% Modified-t UCL 0.599

Gamma Distribution Test

k star (bias corrected) 1.166

Theta Star 0.361

nu star 97.92

Approximate Chi Square Value (.05) 76.09

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 75.4

Anderson-Darling Test Statistic 2.634

Anderson-Darling 5% Critical Value 0.773

Kolmogorov-Smirnov Test Statistic 0.204

Kolmogorov-Smirnov 5% Critical Value 0.14

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 0.542

95% Adjusted Gamma UCL 0.547

Potential UCL to Use

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.875

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Lognormal Distribution

95% H-UCL 0.512

95% Chebyshev (MVUE) UCL 0.623

97.5% Chebyshev (MVUE) UCL 0.728

99% Chebyshev (MVUE) UCL 0.935

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 0.585

95% Jackknife UCL 0.588

95% Standard Bootstrap UCL 0.578

95% Bootstrap-t UCL 1.032

95% Hall's Bootstrap UCL 1.548

95% Percentile Bootstrap UCL 0.606

95% BCA Bootstrap UCL 0.649

95% Chebyshev(Mean, Sd) UCL 0.854

97.5% Chebyshev(Mean, Sd) UCL 1.041

99% Chebyshev(Mean, Sd) UCL 1.408

Use 95% Chebyshev (Mean, Sd) UCL 0.854

Cr (Chromium)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 39

Raw Statistics

Minimum 14.3
Maximum 240
Mean 39.88
Median 33.65
SD 34.39
Coefficient of Variation 0.862
Skewness 5.08

Log-transformed Statistics

Minimum of Log Data 2.66
Maximum of Log Data 5.481
Mean of log Data 3.538
SD of log Data 0.47

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.464
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 48.81

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 53.05
95% Modified-t UCL 49.5

Gamma Distribution Test

k star (bias corrected) 3.303
Theta Star 12.07
nu star 277.4

Approximate Chi Square Value (.05) 239.9
Adjusted Level of Significance 0.0443
Adjusted Chi Square Value 238.6

Anderson-Darling Test Statistic 2.897
Anderson-Darling 5% Critical Value 0.754
Kolmogorov-Smirnov Test Statistic 0.23
Kolmogorov-Smirnov 5% Critical Value 0.137

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 46.13
95% Adjusted Gamma UCL 46.37

Potential UCL to Use

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.85
Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Lognormal Distribution

95% H-UCL 44.08
95% Chebyshev (MVUE) UCL 50.94
97.5% Chebyshev (MVUE) UCL 56.41
99% Chebyshev (MVUE) UCL 67.15

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 48.61
95% Jackknife UCL 48.81
95% Standard Bootstrap UCL 48.7
95% Bootstrap-t UCL 62.76
95% Hall's Bootstrap UCL 83.74
95% Percentile Bootstrap UCL 49.39
95% BCA Bootstrap UCL 55.22
95% Chebyshev(Mean, Sd) UCL 63.01
97.5% Chebyshev(Mean, Sd) UCL 73.02
99% Chebyshev(Mean, Sd) UCL 92.68

**Use 95% Student's-t UCL 48.81
or 95% Modified-t UCL 49.5**

Cu (Copper)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 39

Raw Statistics

Minimum 14.5
Maximum 59.8
Mean 32.7
Median 31.4
SD 10.98
Coefficient of Variation 0.336
Skewness 0.504

Log-transformed Statistics

Minimum of Log Data 2.674
Maximum of Log Data 4.091
Mean of log Data 3.43
SD of log Data 0.349

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.927
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 35.55

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 35.62
95% Modified-t UCL 35.57

Gamma Distribution Test

k star (bias corrected) 8.305
Theta Star 3.937
nu star 697.6

Approximate Chi Square Value (.05) 637.4

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 635.3

Anderson-Darling Test Statistic 0.166

Anderson-Darling 5% Critical Value 0.749

Kolmogorov-Smirnov Test Statistic 0.0628

Kolmogorov-Smirnov 5% Critical Value 0.136

Data appear Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 35.79

95% Adjusted Gamma UCL 35.91

Potential UCL to Use

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.934
Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Lognormal Distribution

95% H-UCL 36.19

95% Chebyshev (MVUE) UCL 40.64

97.5% Chebyshev (MVUE) UCL 44.05

99% Chebyshev (MVUE) UCL 50.74

Data Distribution

Data appear Gamma Distributed at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 35.48

95% Jackknife UCL 35.55

95% Standard Bootstrap UCL 35.39

95% Bootstrap-t UCL 35.73

95% Hall's Bootstrap UCL 35.69

95% Percentile Bootstrap UCL 35.37

95% BCA Bootstrap UCL 35.51

95% Chebyshev(Mean, Sd) UCL 40.08

97.5% Chebyshev(Mean, Sd) UCL 43.28

99% Chebyshev(Mean, Sd) UCL 49.55

Use 95% Approximate Gamma UCL 35.79

Fe (Iron)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 41

Raw Statistics

Minimum 10600

Maximum 58600

Mean 22869

Median 21000

SD 9390

Coefficient of Variation 0.411

Skewness 1.317

Log-transformed Statistics

Minimum of Log Data 9.269

Maximum of Log Data 10.98

Mean of log Data 9.961

SD of log Data 0.396

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.857

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 25307

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 25567

95% Modified-t UCL 25357

Gamma Distribution Test

k star (bias corrected) 6.232

Theta Star 3669

nu star 523.5

Approximate Chi Square Value (.05) 471.5

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 469.7

Anderson-Darling Test Statistic 0.472

Anderson-Darling 5% Critical Value 0.751

Kolmogorov-Smirnov Test Statistic 0.0846

Kolmogorov-Smirnov 5% Critical Value 0.137

Data appear Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 25394

95% Adjusted Gamma UCL 25489

Potential UCL to Use

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.912

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Lognormal Distribution

95% H-UCL 25642

95% Chebyshev (MVUE) UCL 29132

97.5% Chebyshev (MVUE) UCL 31845

99% Chebyshev (MVUE) UCL 37175

Data Distribution

Data appear Gamma Distributed at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 25252

95% Jackknife UCL 25307

95% Standard Bootstrap UCL 25169

95% Bootstrap-t UCL 25760

95% Hall's Bootstrap UCL 25888

95% Percentile Bootstrap UCL 25350

95% BCA Bootstrap UCL 25488

95% Chebyshev(Mean, Sd) UCL 29185

97.5% Chebyshev(Mean, Sd) UCL 31918

99% Chebyshev(Mean, Sd) UCL 37286

Use 95% Approximate Gamma UCL 25394

Pb (Lead)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 37

Raw Statistics

Minimum 7.09
Maximum 51.5
Mean 19.45
Median 17.35
SD 8.544
Coefficient of Variation 0.439
Skewness 1.732

Log-transformed Statistics

Minimum of Log Data 1.959
Maximum of Log Data 3.942
Mean of log Data 2.89
SD of log Data 0.39

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.83
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.943
Shapiro Wilk Critical Value 0.942

Data appear Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 21.67

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 22
95% Modified-t UCL 21.73

Assuming Lognormal Distribution

95% H-UCL 21.69

95% Chebyshev (MVUE) UCL 24.61
97.5% Chebyshev (MVUE) UCL 26.87
99% Chebyshev (MVUE) UCL 31.32

Gamma Distribution Test

k star (bias corrected) 6.099
Theta Star 3.19
nu star 512.3

Approximate Chi Square Value (.05) 460.8

Adjusted Level of Significance 0.0443
Adjusted Chi Square Value 459.1

Anderson-Darling Test Statistic 0.878

Anderson-Darling 5% Critical Value 0.751

Kolmogorov-Smirnov Test Statistic 0.141

Kolmogorov-Smirnov 5% Critical Value 0.137

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 21.63
95% Adjusted Gamma UCL 21.71

Potential UCL to Use

Data Distribution

Data appear Lognormal at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 21.62
95% Jackknife UCL 21.67
95% Standard Bootstrap UCL 21.58
95% Bootstrap-t UCL 22.21
95% Hall's Bootstrap UCL 22.57
95% Percentile Bootstrap UCL 21.64
95% BCA Bootstrap UCL 22.1
95% Chebyshev(Mean, Sd) UCL 25.2
97.5% Chebyshev(Mean, Sd) UCL 27.69
99% Chebyshev(Mean, Sd) UCL 32.57

Use 95% Student's-t UCL 21.67
or 95% Modified-t UCL 21.73
or 95% H-UCL 21.69

Hg (Mercury)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 40

Raw Statistics

Minimum 0.0457

Maximum 0.939

Mean 0.361

Median 0.337

SD 0.168

Coefficient of Variation 0.464

Skewness 0.695

Log-transformed Statistics

Minimum of Log Data -3.087

Maximum of Log Data -0.0629

Mean of log Data -1.169

SD of log Data 0.647

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.903

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.777

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 0.405

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 0.407

95% Modified-t UCL 0.405

Assuming Lognormal Distribution

95% H-UCL 0.469

95% Chebyshev (MVUE) UCL 0.559

97.5% Chebyshev (MVUE) UCL 0.636

99% Chebyshev (MVUE) UCL 0.788

Gamma Distribution Test

k star (bias corrected) 3.25

Theta Star 0.111

nu star 273

Approximate Chi Square Value (.05) 235.7

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 234.5

Anderson-Darling Test Statistic 2.062

Anderson-Darling 5% Critical Value 0.754

Kolmogorov-Smirnov Test Statistic 0.205

Kolmogorov-Smirnov 5% Critical Value 0.137

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 0.418

95% Adjusted Gamma UCL 0.42

Potential UCL to Use

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 0.404

95% Jackknife UCL 0.405

95% Standard Bootstrap UCL 0.404

95% Bootstrap-t UCL 0.41

95% Hall's Bootstrap UCL 0.411

95% Percentile Bootstrap UCL 0.404

95% BCA Bootstrap UCL 0.404

95% Chebyshev(Mean, Sd) UCL 0.474

97.5% Chebyshev(Mean, Sd) UCL 0.523

99% Chebyshev(Mean, Sd) UCL 0.619

Use 95% Chebyshev (Mean, Sd) UCL 0.474

Mo (Molybdenum)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 41

Raw Statistics

Minimum 0.982

Maximum 16.15

Mean 5.879

Median 4.765

SD 3.281

Coefficient of Variation 0.558

Skewness 1.486

Log-transformed Statistics

Minimum of Log Data -0.0182

Maximum of Log Data 2.782

Mean of log Data 1.63

SD of log Data 0.553

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.842

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 6.731

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 6.836

95% Modified-t UCL 6.751

Gamma Distribution Test

k star (bias corrected) 3.438

Theta Star 1.71

nu star 288.8

Approximate Chi Square Value (.05) 250.4

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 249.1

Anderson-Darling Test Statistic 0.482

Anderson-Darling 5% Critical Value 0.753

Kolmogorov-Smirnov Test Statistic 0.106

Kolmogorov-Smirnov 5% Critical Value 0.137

Data appear Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 6.78

95% Adjusted Gamma UCL 6.814

Potential UCL to Use

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.935

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Lognormal Distribution

95% H-UCL 7.024

95% Chebyshev (MVUE) UCL 8.251

97.5% Chebyshev (MVUE) UCL 9.26

99% Chebyshev (MVUE) UCL 11.24

Data Distribution

Data appear Gamma Distributed at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 6.712

95% Jackknife UCL 6.731

95% Standard Bootstrap UCL 6.714

95% Bootstrap-t UCL 6.89

95% Hall's Bootstrap UCL 6.931

95% Percentile Bootstrap UCL 6.706

95% BCA Bootstrap UCL 6.795

95% Chebyshev(Mean, Sd) UCL 8.086

97.5% Chebyshev(Mean, Sd) UCL 9.041

99% Chebyshev(Mean, Sd) UCL 10.92

Use 95% Approximate Gamma UCL 6.78

Ni (Nickel)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 41

Raw Statistics

Minimum 21.6
Maximum 609
Mean 69.09
Median 45.5
SD 93.96
Coefficient of Variation 1.36
Skewness 4.99

Log-transformed Statistics

Minimum of Log Data 3.073
Maximum of Log Data 6.412
Mean of log Data 3.929
SD of log Data 0.645

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.428
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.835
Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 93.48

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 104.9
95% Modified-t UCL 95.34

Assuming Lognormal Distribution

95% H-UCL 76.65

95% Chebyshev (MVUE) UCL 91.4
97.5% Chebyshev (MVUE) UCL 104
99% Chebyshev (MVUE) UCL 128.8

Gamma Distribution Test

k star (bias corrected) 1.67
Theta Star 41.38
nu star 140.3

Approximate Chi Square Value (.05) 113.9

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 113

Anderson-Darling Test Statistic 3.554

Anderson-Darling 5% Critical Value 0.763

Kolmogorov-Smirnov Test Statistic 0.255

Kolmogorov-Smirnov 5% Critical Value 0.138

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 85.08
95% Adjusted Gamma UCL 85.72

Potential UCL to Use

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 92.93

95% Jackknife UCL 93.48

95% Standard Bootstrap UCL 93.11

95% Bootstrap-t UCL 139.2

95% Hall's Bootstrap UCL 186.3

95% Percentile Bootstrap UCL 95.72

95% BCA Bootstrap UCL 109.6

95% Chebyshev(Mean, Sd) UCL 132.3

97.5% Chebyshev(Mean, Sd) UCL 159.6

99% Chebyshev(Mean, Sd) UCL 213.3

Use 95% Chebyshev (Mean, Sd) UCL 132.3

Se (Selenium)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 39

Raw Statistics

Minimum 0.0575

Maximum 4.82

Mean 1.631

Median 1.72

SD 1.142

Coefficient of Variation 0.7

Skewness 0.539

Log-transformed Statistics

Minimum of Log Data -2.856

Maximum of Log Data 1.573

Mean of log Data 0.103

SD of log Data 1.064

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.892

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.848

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 1.927

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 1.936

95% Modified-t UCL 1.93

Assuming Lognormal Distribution

95% H-UCL 2.916

95% Chebyshev (MVUE) UCL 3.535

97.5% Chebyshev (MVUE) UCL 4.237

99% Chebyshev (MVUE) UCL 5.616

Gamma Distribution Test

k star (bias corrected) 1.353

Theta Star 1.205

nu star 113.6

Approximate Chi Square Value (.05) 90.04

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 89.29

Anderson-Darling Test Statistic 0.965

Anderson-Darling 5% Critical Value 0.768

Kolmogorov-Smirnov Test Statistic 0.162

Kolmogorov-Smirnov 5% Critical Value 0.139

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 2.059

95% Adjusted Gamma UCL 2.076

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 1.921

95% Jackknife UCL 1.927

95% Standard Bootstrap UCL 1.913

95% Bootstrap-t UCL 1.943

95% Hall's Bootstrap UCL 1.928

95% Percentile Bootstrap UCL 1.931

95% BCA Bootstrap UCL 1.922

95% Chebyshev(Mean, Sd) UCL 2.399

97.5% Chebyshev(Mean, Sd) UCL 2.732

99% Chebyshev(Mean, Sd) UCL 3.385

Potential UCL to Use

Use 99% Chebyshev (Mean, Sd) UCL 3.385

Ag (Silver)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 37

Raw Statistics

Minimum 0.0575

Maximum 3.235

Mean 0.564

Median 0.334

SD 0.745

Coefficient of Variation 1.321

Skewness 2.795

Log-transformed Statistics

Minimum of Log Data -2.856

Maximum of Log Data 1.174

Mean of log Data -1.019

SD of log Data 0.854

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.533

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 0.757

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 0.806

95% Modified-t UCL 0.765

Gamma Distribution Test

k star (bias corrected) 1.189

Theta Star 0.474

nu star 99.91

Approximate Chi Square Value (.05) 77.85

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 77.15

Anderson-Darling Test Statistic 3.891

Anderson-Darling 5% Critical Value 0.772

Kolmogorov-Smirnov Test Statistic 0.282

Kolmogorov-Smirnov 5% Critical Value 0.14

Data not Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 0.723

95% Adjusted Gamma UCL 0.73

Potential UCL to Use

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.869

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Lognormal Distribution

95% H-UCL 0.697

95% Chebyshev (MVUE) UCL 0.848

97.5% Chebyshev (MVUE) UCL 0.992

99% Chebyshev (MVUE) UCL 1.275

Data Distribution

Data do not follow a Discernable Distribution (0.05)

Nonparametric Statistics

95% CLT UCL 0.753

95% Jackknife UCL 0.757

95% Standard Bootstrap UCL 0.755

95% Bootstrap-t UCL 0.864

95% Hall's Bootstrap UCL 0.768

95% Percentile Bootstrap UCL 0.772

95% BCA Bootstrap UCL 0.828

95% Chebyshev(Mean, Sd) UCL 1.065

97.5% Chebyshev(Mean, Sd) UCL 1.281

99% Chebyshev(Mean, Sd) UCL 1.707

Use 95% Chebyshev (Mean, Sd) UCL 1.065

TI (Thallium)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 41

Raw Statistics

Minimum 0.194

Maximum 1.735

Mean 0.562

Median 0.519

SD 0.325

Coefficient of Variation 0.578

Skewness 2.219

Log-transformed Statistics

Minimum of Log Data -1.64

Maximum of Log Data 0.551

Mean of log Data -0.697

SD of log Data 0.479

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.751

Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.926

Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 0.647

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 0.663

95% Modified-t UCL 0.65

Assuming Lognormal Distribution

95% H-UCL 0.643

95% Chebyshev (MVUE) UCL 0.744

97.5% Chebyshev (MVUE) UCL 0.826

99% Chebyshev (MVUE) UCL 0.985

Gamma Distribution Test

k star (bias corrected) 3.974

Theta Star 0.142

nu star 333.8

Approximate Chi Square Value (.05) 292.5

Adjusted Level of Significance 0.0443

Adjusted Chi Square Value 291.1

Anderson-Darling Test Statistic 0.911

Anderson-Darling 5% Critical Value 0.753

Kolmogorov-Smirnov Test Statistic 0.128

Kolmogorov-Smirnov 5% Critical Value 0.137

Data follow Appr. Gamma Distribution at 5% Significance Level

Data Distribution

Data Follow Appr. Gamma Distribution at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 0.645

95% Jackknife UCL 0.647

95% Standard Bootstrap UCL 0.643

95% Bootstrap-t UCL 0.682

95% Hall's Bootstrap UCL 0.682

95% Percentile Bootstrap UCL 0.651

95% BCA Bootstrap UCL 0.661

95% Chebyshev(Mean, Sd) UCL 0.781

97.5% Chebyshev(Mean, Sd) UCL 0.876

99% Chebyshev(Mean, Sd) UCL 1.061

Assuming Gamma Distribution

95% Approximate Gamma UCL 0.642

95% Adjusted Gamma UCL 0.645

Potential UCL to Use

Use 95% Approximate Gamma UCL 0.642

Zn (Zinc)

General Statistics

Number of Valid Observations 42

Number of Distinct Observations 42

Raw Statistics

Minimum 84.8
Maximum 1670
Mean 497
Median 396.5
SD 369
Coefficient of Variation 0.743
Skewness 1.478

Log-transformed Statistics

Minimum of Log Data 4.44
Maximum of Log Data 7.421
Mean of log Data 5.937
SD of log Data 0.782

Relevant UCL Statistics

Normal Distribution Test

Shapiro Wilk Test Statistic 0.823
Shapiro Wilk Critical Value 0.942

Data not Normal at 5% Significance Level

Lognormal Distribution Test

Shapiro Wilk Test Statistic 0.912
Shapiro Wilk Critical Value 0.942

Data not Lognormal at 5% Significance Level

Assuming Normal Distribution

95% Student's-t UCL 592.8

95% UCLs (Adjusted for Skewness)

95% Adjusted-CLT UCL 604.5
95% Modified-t UCL 595

Assuming Lognormal Distribution

95% H-UCL 666.5

95% Chebyshev (MVUE) UCL 806.9
97.5% Chebyshev (MVUE) UCL 935.6
99% Chebyshev (MVUE) UCL 1189

Gamma Distribution Test

k star (bias corrected) 1.863
Theta Star 266.8
nu star 156.5

Approximate Chi Square Value (.05) 128.6
Adjusted Level of Significance 0.0443
Adjusted Chi Square Value 127.7

Anderson-Darling Test Statistic 0.303
Anderson-Darling 5% Critical Value 0.76
Kolmogorov-Smirnov Test Statistic 0.067
Kolmogorov-Smirnov 5% Critical Value 0.138

Data appear Gamma Distributed at 5% Significance Level

Assuming Gamma Distribution

95% Approximate Gamma UCL 604.9
95% Adjusted Gamma UCL 609.1

Potential UCL to Use

Data Distribution

Data appear Gamma Distributed at 5% Significance Level

Nonparametric Statistics

95% CLT UCL 590.6
95% Jackknife UCL 592.8
95% Standard Bootstrap UCL 589.5
95% Bootstrap-t UCL 604.4
95% Hall's Bootstrap UCL 613.9
95% Percentile Bootstrap UCL 596.7
95% BCA Bootstrap UCL 603.6
95% Chebyshev(Mean, Sd) UCL 745.2
97.5% Chebyshev(Mean, Sd) UCL 852.6
99% Chebyshev(Mean, Sd) UCL 1064

Use 95% Approximate Gamma UCL 604.9

APPENDIX **F**

Air Dispersion Modeling

Emission Rate Calculations - Sample PVT-EndCap-PM10

Soil Disposal Emission Rate

$$Q = (E_{10} \times h \times u_{\text{mean}}) / (L \times 10^6)$$

where: Q: PM₁₀ emission rate (g/s-m²)
 E₁₀: PM₁₀ concentration (µg/m³)
 h: mixing height
 u_{mean}: mean wind speed (m/s), and
 L: landfill length.

E₁₀ = 1100
 L = 45 site-specific
 h = 2
 u_{mean} = 2.8 site-specific

Q = 0.000136889

Unlimited Erosion Model Emission Rate

$$Q = 0.036 \times (1-V) \times (u_{\text{mean}}/u_t)^3 \times F(y) \times (1/3600)$$

where: Q: PM₁₀ emission rate (g/s-m²)
 V: fraction of surface vegetation cover, V = 0 (assumption)
 u_{mean}: mean wind speed (m/s), u_{mean} = 2.8m/s (site-specific data)
 u_t: threshold value of wind speed at 7m (m/s)
 y: y = 0.886 u_t / u_{mean} (dimensionless ratio), and
 F(y): function of y (USEPA 1985)

V = 0
 u_{mean} = 2.8 site-specific
 u_t = 11.32 default (USEPA 1996)
 F(y) = 0.194 default (USEPA 1996)

Q = 2.93587E-08

USEPA 1996 Soil Screening Guidance: User's Guide. Office of Emergency and Remedial Response.
 Washington, DC. OSWER No. 9355.4-23

SCREEN3 - Soil Disposal PM10 Emission Rate

```

***** SCREEN3 MODEL *****
***** VERSION 01/10/76 *****

ENTER TITLE FOR THIS RUN (UP TO 79 CHARACTERS):
MAX

ENTER SOURCE TYPE: P      FOR POINT
                   F      FOR FLARE
                   A      FOR AREA
                   V      FOR VOLUME

ALSO ENTER ANY OF THE FOLLOWING OPTIONS ON THE SAME LINE:

N      TO USE THE NON REGULATORY BUT CONSERVATIVE MODE 2
       MIXING HEIGHT OPTION.
ANOM    TO USE AN ANEMOMETER HEIGHT OTHER THAN THE REGULATORY
        (GENERALLY 10 METER HEIGHT).
EC      TO USE A NON REGULATORY CAVITY CALCULATION ALTERNATIVE
Example: IN 2.0 EC (entry for a point source)

ENTER SOURCE TYPE AND ANY OF THE ABOVE OPTIONS:
P

ENTER EMISSION RATE (G/S M**2):
1.00E+0887

ENTER SOURCE RELEASE HEIGHT (M):
1

ENTER LENGTH OF LARGER SIDE FOR AREA (M):
45

ENTER LENGTH OF SMALLER SIDE FOR AREA (M):
45

ENTER RECEPTOR HEIGHT ABOVE GROUND (FOR FLAGPOLE RECEPTOR) (M):
1.8

ENTER URBAN/BURIAL OPTION (U URBAN, B BURIAL):
U

SEARCH THROUGH RANGE OF DIRECTIONS TO FIND THE MAXIMUM?
ENTER Y OR N:
Y

ENTER CHOICE OF METEOROLOGY:
1 FULL METEOROLOGY (ALL STABILITY & WIND SPEEDS)
2 INPM SINGLE STABILITY CLASS
3 INPM SINGLE STABILITY CLASS AND WIND SPEED
3

ENTER STABILITY CLASS, 1 (A) TO 6 (F):
1

ENTER ANEMOMETER HEIGHT WIND SPEED (M/S):
2.8

USE AUTOMATED DISTANCE ARRAY? ENTER Y OR N:
Y

ENTER MIN AND MAX DISTANCES TO USE (M):
200
8042

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST  CONC  STAB  HIGH  WIND  MIX HI  PLUME  MAX DIR
(M)   (G/M**3)  (M/S) (M/S) (M)   HI (M)  (DEG)
-----
200.  21.92   1    2.8  2.8  896.0  10  40.
300.  9.114   1    2.8  2.8  896.0  10  35.
400.  4.726   1    2.8  2.8  896.0  10  14.
500.  2.614   1    2.8  2.8  896.0  10  6.
600.  1.512   1    2.8  2.8  896.0  10  12.
700.  .9673   1    2.8  2.8  896.0  10  12.
800.  .6481   1    2.8  2.8  896.0  10  12.
900.  .4553   1    2.8  2.8  896.0  10  11.
1000. .3121   1    2.8  2.8  896.0  10  6.
1100. .2124   1    2.8  2.8  896.0  10  6.
1200. .1508   1    2.8  2.8  896.0  10  6.
1300. .1245   1    2.8  2.8  896.0  10  2.
1400. .1084   1    2.8  2.8  896.0  10  10.
1500. .1028   1    2.8  2.8  896.0  10  9.
1600. .1094   1    2.8  2.8  896.0  10  10.
1700. .1122   1    2.8  2.8  896.0  10  11.
1800. .1202   1    2.8  2.8  896.0  10  12.
1900. .1129   1    2.8  2.8  896.0  10  10.
2000. .1146   1    2.8  2.8  896.0  10  12.
2100. .1029   1    2.8  2.8  896.0  10  10.
2200. .1055   1    2.8  2.8  896.0  10  10.
2300. .1015   1    2.8  2.8  896.0  10  11.
2400. .9726E-01 1    2.8  2.8  896.0  10  12.
2500. .9414E-01 1    2.8  2.8  896.0  10  10.
2600. .9117E-01 1    2.8  2.8  896.0  10  12.
2700. .8822E-01 1    2.8  2.8  896.0  10  10.
2800. .8547E-01 1    2.8  2.8  896.0  10  11.
2900. .8290E-01 1    2.8  2.8  896.0  10  10.
3000. .8047E-01 1    2.8  2.8  896.0  10  10.
3500. .7010E-01 1    2.8  2.8  896.0  10  10.
4000. .6220E-01 1    2.8  2.8  896.0  10  8.
4500. .5653E-01 1    2.8  2.8  896.0  10  8.
5000. .5170E-01 1    2.8  2.8  896.0  10  10.
5500. .4762E-01 1    2.8  2.8  896.0  10  8.
6000. .4412E-01 1    2.8  2.8  896.0  10  8.
6500. .4125E-01 1    2.8  2.8  896.0  10  14.
7000. .3821E-01 1    2.8  2.8  896.0  10  8.
7500. .3648E-01 1    2.8  2.8  896.0  10  8.
8000. .3452E-01 1    2.8  2.8  896.0  10  13.

ITERATING TO FIND MAXIMUM CONCENTRATION . . .

MAXIMUM 1 HR CONCENTRATION AT OR BEYOND 200. M:
200.  21.92   1    2.8  2.8  896.0  10  40.

USE DISCRETE DISTANCES? ENTER Y OR N:
Y

TO CEASE, ENTER A DISTANCE OF ZERO (0).

*** SCREEN DISCRETE DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST  CONC  STAB  HIGH  WIND  MIX HI  PLUME  MAX DIR
(M)   (G/M**3)  (M/S) (M/S) (M)   HI (M)  (DEG)
-----
ENTER DISTANCE (M) (0 TO EXIT):
402
402.  4.669   1    2.8  2.8  896.0  10  9.
ENTER DISTANCE (M) (0 TO EXIT):

```


APPENDIX G

Risk Characterization Spreadsheets

Summary of Dose-Response Information
Activity Description

Constituent	EPC Concentration in Ash (mg/kg)	Oral CSF (mg/kg-d) ^a -1	Inhalation CSF (mg/kg-d) ^a -1	Inhalation URF (ug/m3) ^a -1	Oral TDI/RfD (mg/kg-d)	Inhalation TC/RfC (ug/m3)	Inhalation RFDi (mg/kg/day)	Inhalation RAF Cancer Noncancer Chronic	Oral Soil/Sediment/Water Cancer Noncancer Chronic	Dermal Soil/Sediment Cancer Noncancer Chronic
METALS										
Antimony	0.719	NA	NA	NA	4.00E-04	NA	4.00E-04	d 1 1	NA 0.15	y NA 1
Arsenic	18.17	1.50E+00 a	1.51E+01 g	4.30E-03 a	3.00E-04 a	1.50E-02 a	4.29E-06 c	1 1	0.51 0.51	x 0.0004 0.0004 z
Barium	645.2	NA	NA	NA	2.00E-01 a	5.00E-01 b	1.43E-04 c	1 1	NA 0.07	y NA 1
Beryllium	3.121	NA	8.40E+00 g	2.40E-03 a	2.00E-03 a	2.00E-02 a	5.71E-06 c	1 1	NA 0.007	y NA 0.14 y
Boron	769.7	NA	NA	NA	2.00E-01 a	2.00E+01 b	5.71E-03 c	1 1	NA 1	y NA 1
Cadmium	0.606	NA	6.62E+00 g	1.89E-03 a	1.00E-03 a	1.00E-03 e	2.86E-07 c	1 1	NA 0.025	y NA 0.001 y
Chromium VI (1:6 VI:III Ratio)	8.231666667	NA	NA	NA	3.00E-03 a	1.00E-01	2.86E-05 c	1 1	NA 0.025	w NA 0.04 x
Copper	35.39	NA	NA	NA	NA	NA	NA	1 1	NA 1	y NA 1
Iron	25350	NA	NA	NA	NA	NA	NA	1 1	NA 1	y NA 1
Lead	21.64	NA	NA	NA	NA	NA	NA	1 1	NA 1	w NA NA
Mercury, Divalent	0.404	NA	NA	NA	NA	3.00E-01 a	8.57E-05 c	1 1	NA 0.07	y NA 0.01 y
Molybdenum	6.741	NA	NA	NA	5.00E-03 a	NA	5.00E-03 d	1 1	NA 1	y NA 1
Nickel	95.72	NA	9.10E-01	2.60E-04	2.00E-02 a	9.00E-02 e	2.57E-05 c	1 1	NA 0.04	y NA 1
Selenium	1.931	NA	NA	NA	5.00E-03 a	2.00E+01 f	5.71E-03 c	1 1	NA 1	y NA 1
Silver	0.772	NA	NA	NA	5.00E-03 a	NA	5.00E-03 d	1 1	NA 0.04	y NA 1
Thallium	0.651	NA	NA	NA	NA	NA	NA	1 1	NA 1	y NA 1
Zinc	596.7	NA	NA	NA	3.00E-01 a	NA	3.00E-01 d	1 1	NA 1	y NA 0.003 x

NA - Not Applicable

(a) U.S. EPA (2009). IRIS.

(b) HEAST

(c) Derived from Inhalation RfC

(d) Derived from Oral RfD.

(e) ASTDR

(f) Cal EPA

(g) derived from Inhalation URF

(w) RAIS

(x) AMEC Derived

(y) EPA Region 9 RSL Table (2009)

(z) Hawaii DOH EAL Table H (2009)

WORKER - DUST INHALATION - ASH EXPOSURES
RISK CHARACTERIZATION
PVT LANDFILL

Scenario:	Subactivity name
Receptor:	Worker
Medium:	Dust from ash
Exposure Pathway:	Inhalation

Chemical Concentration in Air = CS * RP

$$\text{ADD (mg/kg/day)} = \frac{\text{C}_{\text{dust}} \times \text{IR} \times \text{RAF} \times \text{ET} \times \text{EF} \times \text{ED}}{\text{AT} \times \text{BW}}$$

$$\text{Hazard Quotient (HQ)} = \frac{\text{ADD (mg/kg/day)}}{\text{RfDi (mg/kg/day)}}$$

$$\text{Cancer Risk (ELCR)} = \text{ADD (mg/kg/day)} \times \text{CSFi [1/(mg/kg/day)]}$$

Parameter (units)	Value
ADD: Average Daily Dose (mg/kg/day)	See Below
CS: Chemical Concentration in Soil (mg/kg)	Chemical-Specific
C _{dust} : Concentration of dust-bound chemical in air (mg/m3)	Calculated
RAF: Relative Absorption Factor (Inhalation) (unitless)	Chemical-Specific
ET: Exposure Time - dust (hr/d)	8
EF: Exposure Frequency (days/year)	250
ED: Exposure Duration (years)	25
IR: Inhalation Rate (m3/hr)	0.833
AT: Averaging Time (days) (ED x 365 days/yr, noncancer)	9125
AT: Averaging Time (days) (75 yr. x 365 days/yr, cancer)	25550
BW: Body Weight (kg)	70
RfDi: Reference Dose Inhalation (mg/kg/day)	Chemical-Specific
CSFi: Cancer Slope Factor Inhalation [1/(mg/kg/day)]	Chemical-Specific
RP: Respirable particulate conc. in air (mg/m3)	5.90E-01 (Maximum PM10 Concentration)
CF: Conversion Factor (kg/mg)	1.00E-06

Compound	Soil Concentration (mg/kg)	Chemical Concentration in Air (mg/m3)	Noncancer Hazard Quotient				Excess Lifetime Cancer Risk			
			Inhalation RAF (noncancer)	ADD (noncancer) (mg/kg/day)	RfDi (non-cancer) (mg/kg/day)	Soil-Dust HQ	Inhalation RAF (cancer)	ADD (cancer) (mg/kg/day)	CSFi [1/(mg/kg/day)]	Soil- Dust Risk
METALS										
Antimony	7.19E-01	4.24E-07	1	2.77E-08	4.00E-04	6.92E-05	1	NA	NA	NA
Arsenic	1.82E+01	1.07E-05	1	6.99E-07	4.29E-06	1.63E-01	1	2.50E-07	1.51E+01	3.76E-06
Barium	6.45E+02	3.81E-04	1	2.48E-05	1.43E-04	1.74E-01	1	NA	NA	NA
Beryllium	3.12E+00	1.84E-06	1	1.20E-07	5.71E-06	2.10E-02	1	4.29E-08	8.40E+00	3.60E-07
Boron	7.70E+02	4.54E-04	1	2.96E-05	5.71E-03	5.18E-03	1	NA	NA	NA
Cadmium	6.06E-01	3.58E-07	1	2.33E-08	2.86E-07	8.16E-02	1	8.33E-09	6.62E+00	5.51E-08
Chromium VI (1:6 VI:III Ratio)	8.23E+00	4.86E-06	1	3.17E-07	2.86E-05	1.11E-02	1	NA	NA	NA
Copper	3.54E+01	2.09E-05	1	NA	NA	NA	1	NA	NA	NA
Iron	2.54E+04	1.50E-02	1	NA	NA	NA	1	NA	NA	NA
Lead	2.16E+01	1.28E-05	1	NA	NA	NA	1	NA	NA	NA
Mercury, Divalent	4.04E-01	2.38E-07	1	1.55E-08	8.57E-05	1.81E-04	1	NA	NA	NA
Molybdenum	6.74E+00	3.98E-06	1	2.59E-07	5.00E-03	5.19E-05	1	NA	NA	NA
Nickel	9.57E+01	5.65E-05	1	3.68E-06	2.57E-05	1.43E-01	1	1.32E-06	9.10E-01	1.20E-06
Selenium	1.93E+00	1.14E-06	1	7.43E-08	5.71E-03	1.30E-05	1	NA	NA	NA
Silver	7.72E-01	4.55E-07	1	2.97E-08	5.00E-03	5.94E-06	1	NA	NA	NA
Thallium	6.51E-01	3.84E-07	1	NA	NA	NA	1	NA	NA	NA
Zinc	5.97E+02	3.52E-04	1	2.30E-05	3.00E-01	7.65E-05	1	NA	NA	NA
						5.99E-01				5.37E-06

WORKER - DUST INHALATION - 1 HR END CAP ASH EXPOSURES
RISK CHARACTERIZATION
PVT LANDFILL

Scenario:	Subactivity name
Receptor:	Worker
Medium:	Dust from ash
Exposure Pathway:	Inhalation

Chemical Concentration in Air = CS * RP

$$\text{ADD (mg/kg/day)} = \frac{\text{Cdust} \times \text{IR} \times \text{RAF} \times \text{ET} \times \text{EF} \times \text{ED}}{\text{AT} \times \text{BW}}$$

$$\text{Hazard Quotient (HQ)} = \frac{\text{ADD (mg/kg/day)}}{\text{RfDi (mg/kg/day)}}$$

$$\text{Cancer Risk (ELCR)} = \text{ADD (mg/kg/day)} \times \text{CSFi [1/(mg/kg/day)]}$$

Parameter (units)	Value
ADD: Average Daily Dose (mg/kg/day)	See Below
CS: Chemical Concentration in Soil (mg/kg)	Chemical-Specific
Cdust: Concentration of dust-bound chemical in air (mg/m3)	Calculated
RAF: Relative Absorption Factor (Inhalation) (unitless)	Chemical-Specific
ET: Exposure Time - dust (hr/d)	1
EF: Exposure Frequency (days/year)	250
ED: Exposure Duration (years)	25
IR: Inhalation Rate (m3/hr)	0.833
AT: Averaging Time (days) (ED x 365 days/yr, noncancer)	9125
AT: Averaging Time (days) (75 yr. x 365 days/yr, cancer)	25550
BW: Body Weight (kg)	70
RfDi: Reference Dose Inhalation (mg/kg/day)	Chemical-Specific
CSFi: Cancer Slope Factor Inhalation [1/(mg/kg/day)]	Chemical-Specific
RP: Respirable particulate conc. in air (mg/m3)	1.10E+00 (End Cap PM10 Concentration)
CF: Conversion Factor (kg/mg)	1.00E-06

Compound	Soil Concentration (mg/kg)	Chemical Concentration in Air (mg/m3)	Noncancer Hazard Quotient				Excess Lifetime Cancer Risk			
			Inhalation RAF (noncancer)	ADD (noncancer) (mg/kg/day)	RfDi (non-cancer) (mg/kg/day)	Soil-Dust HQ	Inhalation RAF (cancer)	ADD (cancer) (mg/kg/day)	CSFi [1/(mg/kg/day)]	Soil- Dust Risk
METALS										
Antimony	7.19E-01	7.91E-07	1	6.45E-09	4.00E-04	1.61E-05	1	NA	NA	NA
Arsenic	1.82E+01	2.00E-05	1	1.63E-07	4.29E-06	3.80E-02	1	5.82E-08	1.51E+01	8.76E-07
Barium	6.45E+02	7.10E-04	1	5.78E-06	1.43E-04	4.05E-02	1	NA	NA	NA
Beryllium	3.12E+00	3.43E-06	1	2.80E-08	5.71E-06	4.90E-03	1	9.99E-09	8.40E+00	8.39E-08
Boron	7.70E+02	8.47E-04	1	6.90E-06	5.71E-03	1.21E-03	1	NA	NA	NA
Cadmium	6.06E-01	6.67E-07	1	5.43E-09	2.86E-07	1.90E-02	1	1.94E-09	6.62E+00	1.28E-08
Chromium VI (1:6 VI:III Ratio)	8.23E+00	9.05E-06	1	7.38E-08	2.86E-05	2.58E-03	1	NA	NA	NA
Copper	3.54E+01	3.89E-05	1	NA	NA	NA	1	NA	NA	NA
Iron	2.54E+04	2.79E-02	1	NA	NA	NA	1	NA	NA	NA
Lead	2.16E+01	2.38E-05	1	NA	NA	NA	1	NA	NA	NA
Mercury, Divalent	4.04E-01	4.44E-07	1	3.62E-09	8.57E-05	4.23E-05	1	NA	NA	NA
Molybdenum	6.74E+00	7.42E-06	1	6.04E-08	5.00E-03	1.21E-05	1	NA	NA	NA
Nickel	9.57E+01	1.05E-04	1	8.58E-07	2.57E-05	3.34E-02	1	3.07E-07	9.10E-01	2.79E-07
Selenium	1.93E+00	2.12E-06	1	1.73E-08	5.71E-03	3.03E-06	1	NA	NA	NA
Silver	7.72E-01	8.49E-07	1	6.92E-09	5.00E-03	1.38E-06	1	NA	NA	NA
Thallium	6.51E-01	7.16E-07	1	NA	NA	NA	1	NA	NA	NA
Zinc	5.97E+02	6.56E-04	1	5.35E-06	3.00E-01	1.78E-05	1	NA	NA	NA
						1.40E-01				1.25E-06

WORKER - DIRECT CONTACT - ASH EXPOSURES
RISK CHARACTERIZATION
PVT LANDFILL

Scenario:	Subactivity name
Receptor:	Industrial Worker
Medium:	Ash
Exposure Pathway:	Ingestion and Dermal Contact

$$\text{ADD (mg/kg-day)} = \frac{\text{CS} \times [(\text{IR} \times \text{FI} \times \text{RAF}) + (\text{SA} \times \text{AF} \times \text{FA} \times \text{RAF} \times \text{EFD})] \times \text{EF} \times \text{ED} \times \text{CF}}{\text{BW} \times \text{AT}}$$

$$\text{Hazard Quotient (HQ)} = \frac{\text{ADD (mg/kg-day)}}{\text{RfD (mg/kg-day)}}$$

$$\text{Cancer Risk (ELCR)} = \text{ADD (mg/kg-day)} \times \text{CSF [1/(mg/kg-day)]}$$

Parameter (units)	Value
ADD: Average Daily Dose (mg/kg-day)	See Below
CS: Chemical Concentration in Soil (mg/kg)	Chemical-Specific
IR: Ingestion Rate (mg/day)	100
RAF: Relative Absorption Factor (Oral-Soil) (unitless)	Chemical-Specific
FI: Fraction Ingested from Site (unitless)	1
SA: Skin Surface Area (cm ²)	3300
AF: Adherence Factor (mg/cm ² /event)	0.29
RAF: Relative Absorption Factor (Dermal-Soil) (unitless)	Chemical-Specific
FA: Fraction Absorbed from Site (unitless)	1
EFD: Exposure Frequency - Dermal (event/day)	1
EF: Exposure Frequency (days/year)	250
ED: Exposure Duration (years)	25
BW: Body Weight (kg)	70
AT: Averaging Time (days) (ED x 365 days/yr, noncancer)	9125
AT: Averaging Time (days) (75 yr. x 365 days/yr, cancer)	25550
CF: Conversion factor (kg/mg)	1.00E-06
RfD: Reference Dose (mg/kg-day)	Chemical-Specific
CSF: Cancer Slope Factor [1/(mg/kg-day)]	Chemical-Specific

Compound	Soil Concentration (mg/kg)	Noncancer Hazard Quotient					Excess Lifetime Cancer Risk				
		Oral-Soil RAF (noncancer)	Dermal-Soil RAF (noncancer)	ADD (noncancer) (mg/kg-day)	Chronic TDI/RfD (mg/kg-day)	Soil HQ	Oral-Soil RAF (cancer)	Dermal-Soil RAF (cancer)	ADD (cancer) (mg/kg-day)	CSF [1/(mg/kg-day)]	Soil Risk
METALS											
Antimony	7.19E-01	0.15	1	6.84E-06	4.00E-04	1.71E-02	NA	NA	NA	NA	NA
Arsenic	1.82E+01	0.51	0.0004	9.14E-06	3.00E-04	3.05E-02	0.51	0.0004	3.26E-06	1.50E+00	4.89E-06
Barium	6.45E+02	0.07	1	6.09E-03	2.00E-01	3.04E-02	NA	NA	NA	NA	NA
Beryllium	3.12E+00	0.007	0.14	4.11E-06	2.00E-03	2.06E-03	NA	NA	NA	NA	NA
Boron	7.70E+02	1	1	7.96E-03	2.00E-01	3.98E-02	NA	NA	NA	NA	NA
Cadmium	6.06E-01	0.025	0.001	2.05E-08	1.00E-03	2.05E-05	NA	NA	NA	NA	NA
Chromium VI (1:6 VI:III Ratio)	8.23E+00	0.025	0.04	3.28E-06	3.00E-03	1.09E-03	NA	NA	NA	NA	NA
Copper	3.54E+01	1	1	NA	NA	NA	NA	NA	NA	NA	NA
Iron	2.54E+04	1	1	NA	NA	NA	NA	NA	NA	NA	NA
Lead	2.16E+01	1	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mercury, Divalent	4.04E-01	0.07	0.01	NA	NA	NA	NA	NA	NA	NA	NA
Molybdenum	6.74E+00	1	1	6.97E-05	5.00E-03	1.39E-02	NA	NA	NA	NA	NA
Nickel	9.57E+01	0.04	1	9.00E-04	2.00E-02	4.50E-02	NA	NA	NA	NA	NA
Selenium	1.93E+00	1	1	2.00E-05	5.00E-03	3.99E-03	NA	NA	NA	NA	NA
Silver	7.72E-01	0.04	1	7.26E-06	5.00E-03	1.45E-03	NA	NA	NA	NA	NA
Thallium	6.51E-01	1	1	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	5.97E+02	1	0.003	6.01E-04	3.00E-01	2.00E-03	NA	NA	NA	NA	NA

1.87E-01

4.89E-06

CHILD RESIDENT - DUST INHALATION - ASH EXPOSURES
RISK CHARACTERIZATION
PVT LANDFILL

Scenario:	Subactivity name
Receptor:	Child Resident
Medium:	Dust from ash
Exposure Pathway:	Inhalation

Chemical Concentration in Air = CS * RP

$$\text{ADD (mg/kg/day)} = \frac{\text{C}_{\text{dust}} \times \text{IR} \times \text{RAF} \times \text{ET} \times \text{EF} \times \text{ED}}{\text{AT} \times \text{BW}}$$

$$\text{Hazard Quotient (HQ)} = \frac{\text{ADD (mg/kg/day)}}{\text{RfDi (mg/kg/day)}}$$

$$\text{Cancer Risk (ELCR)} = \text{ADD (mg/kg/day)} \times \text{CSFi [1/(mg/kg/day)]}$$

Parameter (units)	Value
ADD: Average Daily Dose (mg/kg/day)	See Below
CS: Chemical Concentration in Soil (mg/kg)	Chemical-Specific
C _{dust} : Concentration of dust-bound chemical in air (mg/m ³)	Calculated
RAF: Relative Absorption Factor (Inhalation) (unitless)	Chemical-Specific
ET: Exposure Time - dust (hr/d)	24
EF: Exposure Frequency (days/year)	350
ED: Exposure Duration (years)	6
IR: Inhalation Rate (m ³ /hr)	0.417
AT: Averaging Time (days) (ED x 365 days/yr, noncancer)	2190
AT: Averaging Time (days) (75 yr. x 365 days/yr, cancer)	25550
BW: Body Weight (kg)	15
RfDi: Reference Dose Inhalation (mg/kg/day)	Chemical-Specific
CSFi: Cancer Slope Factor Inhalation [1/(mg/kg/day)]	Chemical-Specific
RP: Respirable particulate conc. in air (mg/m ³)	9.34E-04 (SCREEN 3 Results)
CF: Conversion Factor (kg/mg)	1.00E-06

Compound	Soil Concentration (mg/kg)	Chemical Concentration in Air (mg/m ³)	Noncancer Hazard Quotient				Excess Lifetime Cancer Risk			
			Inhalation RAF (noncancer)	ADD (noncancer) (mg/kg/day)	RfDi (non-cancer) (mg/kg/day)	Soil-Dust HQ	Inhalation RAF (cancer)	ADD (cancer) (mg/kg/day)	CSFi [1/(mg/kg/day)]	Soil- Dust Risk
METALS										
Antimony	7.19E-01	6.71E-10	1	4.30E-10	4.00E-04	1.07E-06	1	NA	NA	NA
Arsenic	1.82E+01	1.70E-08	1	1.09E-08	4.29E-06	2.53E-03	1	9.30E-10	1.51E+01	1.40E-08
Barium	6.45E+02	6.02E-07	1	3.85E-07	1.43E-04	2.70E-03	1	NA	NA	NA
Beryllium	3.12E+00	2.91E-09	1	1.86E-09	5.71E-06	3.26E-04	1	1.60E-10	8.40E+00	1.34E-09
Boron	7.70E+02	7.19E-07	1	4.60E-07	5.71E-03	8.05E-05	1	NA	NA	NA
Cadmium	6.06E-01	5.66E-10	1	3.62E-10	2.86E-07	1.27E-03	1	3.10E-11	6.62E+00	2.05E-10
Chromium VI (1:6 VI:III Ratio)	8.23E+00	7.69E-09	1	4.92E-09	2.86E-05	1.72E-04	1	NA	NA	NA
Copper	3.54E+01	3.30E-08	1	NA	NA	NA	1	NA	NA	NA
Iron	2.54E+04	2.37E-05	1	NA	NA	NA	1	NA	NA	NA
Lead	2.16E+01	2.02E-08	1	NA	NA	NA	1	NA	NA	NA
Mercury, Divalent	4.04E-01	3.77E-10	1	2.41E-10	8.57E-05	2.82E-06	1	NA	NA	NA
Molybdenum	6.74E+00	6.29E-09	1	4.03E-09	5.00E-03	8.05E-07	1	NA	NA	NA
Nickel	9.57E+01	8.94E-08	1	5.72E-08	2.57E-05	2.22E-03	1	4.90E-09	9.10E-01	4.46E-09
Selenium	1.93E+00	1.80E-09	1	1.15E-09	5.71E-03	2.02E-07	1	NA	NA	NA
Silver	7.72E-01	7.21E-10	1	4.61E-10	5.00E-03	9.22E-08	1	NA	NA	NA
Thallium	6.51E-01	6.08E-10	1	NA	NA	NA	1	NA	NA	NA
Zinc	5.97E+02	5.57E-07	1	3.56E-07	3.00E-01	1.19E-06	1	NA	NA	NA

9.31E-03

2.00E-08

ADULT RESIDENT - DUST INHALATION - ASH EXPOSURES
RISK CHARACTERIZATION
PVT LANDFILL

Scenario:	Subactivity name
Receptor:	Adult Resident
Medium:	Dust from ash
Exposure Pathway:	Inhalation

Chemical Concentration in Air = CS * RP * CF

ADD (mg/kg/day) = $\frac{Cdust \times IR \times RAF \times ET \times EF \times ED}{AT \times BW}$

Hazard Quotient (HQ) = ADD (mg/kg/day) / RfDi (mg/kg/day)
Cancer Risk (ELCR) = ADD (mg/kg/day) * CSFi [1/(mg/kg/day)]

Parameter (units)			Value							
ADD: Average Daily Dose (mg/kg/day)			See Below							
CS: Chemical Concentration in Soil (mg/kg)			Chemical-Specific							
Cdust: Concentration of dust-bound chemical in air (mg/m3)			Calculated							
RAF: Relative Absorption Factor (Inhalation) (unitless)			Chemical-Specific							
ET: Exposure Time - dust (hr/d)			24							
EF: Exposure Frequency (days/year)			350							
ED: Exposure Duration (years)			24							
IR: Inhalation Rate (m3/hr)			0.833							
AT: Averaging Time (days) (ED x 365 days/yr, noncancer)			8760							
AT: Averaging Time (days) (75 yr. x 365 days/yr, cancer)			25550							
BW: Body Weight (kg)			70							
RfDi: Reference Dose Inhalation (mg/kg/day)			Chemical-Specific							
CSFi: Cancer Slope Factor Inhalation [1/(mg/kg/day)]			Chemical-Specific							
RP: Respirable particulate conc. in air (mg/m3)			9.34E-04 (SCREEN 3 Results)							
CF: Conversion Factor (kg/mg)			1.00E-06							
Compound	Soil Concentration (mg/kg)	Chemical Concentration in Air (mg/m3)	Noncancer Hazard Quotient				Excess Lifetime Cancer Risk			
			Inhalation RAF (noncancer)	ADD (noncancer) (mg/kg/day)	RfDi (non-cancer) (mg/kg/day)	Soil-Dust HQ	Inhalation RAF (cancer)	ADD (cancer) (mg/kg/day)	CSFi [1/(mg/kg/day)]	Soil- Dust Risk
METALS										
Antimony	7.19E-01	6.71E-10	1	1.84E-10	4.00E-04	4.60E-07	1	NA	NA	NA
Arsenic	1.82E+01	1.70E-08	1	4.65E-09	4.29E-06	1.08E-03	1	1.59E-09	1.51E+01	2.40E-08
Barium	6.45E+02	6.02E-07	1	1.65E-07	1.43E-04	1.15E-03	1	NA	NA	NA
Beryllium	3.12E+00	2.91E-09	1	7.98E-10	5.71E-06	1.40E-04	1	2.74E-10	8.40E+00	2.30E-09
Boron	7.70E+02	7.19E-07	1	1.97E-07	5.71E-03	3.44E-05	1	NA	NA	NA
Cadmium	6.06E-01	5.66E-10	1	1.55E-10	2.86E-07	5.42E-04	1	5.31E-11	6.62E+00	3.51E-10
Chromium VI (1:6 VI:III Ratio)	8.23E+00	7.69E-09	1	2.11E-09	2.86E-05	7.37E-05	1	NA	NA	NA
Copper	3.54E+01	3.30E-08	1	NA	NA	NA	1	NA	NA	NA
Iron	2.54E+04	2.37E-05	1	NA	NA	NA	1	NA	NA	NA
Lead	2.16E+01	2.02E-08	1	NA	NA	NA	1	NA	NA	NA
Mercury, Divalent	4.04E-01	3.77E-10	1	1.03E-10	8.57E-05	1.21E-06	1	NA	NA	NA
Molybdenum	6.74E+00	6.29E-09	1	1.72E-09	5.00E-03	3.45E-07	1	NA	NA	NA
Nickel	9.57E+01	8.94E-08	1	2.45E-08	2.57E-05	9.52E-04	1	8.39E-09	9.10E-01	7.64E-09
Selenium	1.93E+00	1.80E-09	1	4.94E-10	5.71E-03	8.64E-08	1	NA	NA	NA
Silver	7.72E-01	7.21E-10	1	1.97E-10	5.00E-03	3.95E-08	1	NA	NA	NA
Thallium	6.51E-01	6.08E-10	1	NA	NA	NA	1	NA	NA	NA
Zinc	5.97E+02	5.57E-07	1	1.53E-07	3.00E-01	5.09E-07	1	NA	NA	NA
						3.98E-03	3.43E-08			

APPENDIX H

Relative Absorption Factors Derivation

ARSENIC

The oral reference dose for noncarcinogenic effects of arsenic is $3\text{E-}04$ mg/kg-day, and the oral cancer slope factor for carcinogenic effects is 1.5 per mg/kg-day (IRIS-U.S. EPA, 2001). Both values are based on epidemiological studies that characterized health effects in a large population of Taiwanese who consumed drinking water containing arsenic. The exact form of the ingested arsenic is unknown.

Estimation of Absorption in the Dose-Response Study

The relevant dose-response study characterized health effects in a large population of Taiwanese who consumed drinking water containing arsenic. Several studies investigating the absorption of arsenic have been performed in humans and various animal species. Human studies are sufficiently extensive to strongly suggest that close to 100% of soluble inorganic arsenic in water is absorbed from the gastrointestinal tract. These human studies are reviewed in detail here.

One direct indication of absorption of an orally administered dose of a chemical is its urinary excretion. Several studies show that urinary excretion can account for the majority of an orally administered dose of arsenic. Buchet et al. (1981a) administered aqueous sodium arsenite (NaAsO_2) as a single dose to three human volunteers. An average of 45% of the dose was excreted in the urine in four days. In a second study (Buchet et al., 1981b), four individuals given 125, 250, 500, or 1000 μg As/day orally for five days excreted 54, 73, 74, and 64% of the dose in urine, respectively, over 14 days. The average urinary excretion of arsenic for the four subjects was 66% of the administered dose. Crecelius (1977) reports that approximately 50% and 80% of orally administered aqueous arsenic was excreted in urine within 61 hours by a single individual in two experiments. The results of these studies represent the minimum amount of arsenic absorbed since the balance of the dose was not accounted for.

Data for human fecal excretion of arsenic do exist. Pomroy et al. (1980) gave 6 male subjects radiolabelled arsenic acid ($[^{74}\text{As}]\text{H}_3\text{AsO}_4$) in gelatin capsules followed by a glass of water. The presence of arsenic in the body, urine, and feces was measured using a whole body radiation counter. The authors report that for the six subjects the average total excretion over 7 days was $6.1 \pm 2.8\%$ in feces. It is not possible to determine how much of this arsenic was first absorbed and then excreted. The total recovery of arsenic (urine plus feces) was $68.4 \pm 4.0\%$ of the single oral dose. The remaining arsenic was reported to be present in the body tissues; virtually the entire dose could be accounted for. This suggests a minimum absorption of 94% ($100\% - 6\%$) of orally ingested arsenic.

A study by Bettley and O'Shea (1975) also reports excretion of arsenic in both urine and feces. Three subjects were exposed to 8.52 mg As (as 1.25 ml of Liq. Arsenicalis B.P.) in three portions 8 hours apart on one day. They found that at most 3.5% of the dose was excreted in feces over ten days. This suggests a minimum absorption of 96%. Urinary excretion averaged $52 \pm 4\%$ of the exposure dose over 10 days ($n=3$). The remaining half of the dose was unaccounted for, although small amounts of arsenic were found in blood and hair.

In the Coulson study (Coulson et al., 1935), results from two humans each ingesting two forms of arsenic are reported. Less than 5% of an oral dose was excreted in feces whether the arsenic was taken as arsenic trioxide (As_2O_3) or as natural arsenic present in shrimp.

The remainder of the dose, more than 95%, was recovered in urine in three experiments where total recoveries ranged from 74 to 115%. Based on the fecal excretion data from this study, it can be estimated that at least 95% of the ingested arsenic was absorbed. The fecal excretion data are consistent with those of Pomroy et al. (1980) and Bettley and O'Shea (1975).

Fecal excretion data from oral studies provide a minimum estimate of absorption, because it cannot be determined how much of the dose was first absorbed and then excreted into the feces. However, a study in humans injected intravenously with arsenic suggests that absorbed arsenic may be excreted, presumably from bile, into the feces. Mealy et al. (1959) administered radiolabelled arsenic by intravenous injection. Between 57% and 90% of the injected dose was recovered in urine in 10 days. Fecal excretion accounted for 1.3% of the dose after seventeen days in one individual. A second subject excreted 0.2% of the intravenous dose into the feces in one week. Both results indicate some excretion of arsenic into the feces. Virtually all of the remaining dose was recovered in the urine. Biliary excretion of arsenic has been demonstrated in rats, rabbits, and dogs (Klaassen, 1974; Gregus and Klaassen, 1986). This indicates that a portion of the arsenic found in feces in studies using oral dosing may have been first absorbed and then excreted.

The urinary excretion data from the oral studies discussed above provide minimum estimates of arsenic absorption ranging from 45% to 95%. The fecal excretion data suggest that, at a minimum, 95-96% of an orally administered dose of arsenic is absorbed. The study of intravenously administered arsenic suggest that biliary excretion can occur. Therefore, it can conservatively be concluded from the above studies that virtually 100% of an orally administered dose of soluble inorganic arsenic can be absorbed in humans.

RAF (Oral-Soil)

The oral-soil RAF for arsenic is defined as: (absorption of arsenic in humans from ingested soil) / (absorption of arsenic in humans in the epidemiological study from ingested water). There are many forms of inorganic arsenic, and these have widely varying solubilities. While it is appropriate to assume that arsenic present in water would be a soluble form of arsenic, this is not necessarily the case for arsenic present in soil or ash. Arsenic present in soils can either be in a relatively insoluble mineral form, such as would be expected in slags, mine tailings, and ash; or, the arsenic can be present in a more soluble form such as might be present at hazardous waste sites where arsenic salts were either disposed of or accidentally released. Even soluble species, however, become bound tightly to soils after years of weathering.

Ruby et al. (1999) Literature Review

Ruby et al. (1999) have recently summarized the available bioavailability studies from arsenic-containing media from metal mining and processing sites. Twenty two Relative Absorption Factors have been summarized from studies in swine, rats, rabbits and monkeys. The RAFs range from 0.03 to 0.51. It should be noted that two samples from Aspen, CO were rejected because the arsenic levels were too low to produce reliable estimates of the RAF by the method used. The mean value for arsenic RAF from these 22 studies was 0.26. The values are summarized below.

TABLE 1
SUMMARY OF ORAL-SOIL RAFS FOR ARSENIC FROM THE LITERATURE

Source of Sample	Study Type	Arsenic Level (mg/kg)	RAF
Aspen soil (berm)	EPA Region VIII Swine Study	67	Rejected as unreliable
Aspen soil (residential)	EPA Region VIII Swine Study	17	Rejected as unreliable
Bingham Creek tailings (channel)	EPA Region VIII Swine Study	149	0.37
Butte soil	EPA Region VIII Swine Study	239	0.10
Leadville soil (residential)	EPA Region VIII Swine Study	203	0.08
Leadville soil (Fe-Mn-Pb oxide)	EPA Region VIII Swine Study	110	0.28
Leadville soil (AV)	EPA Region VIII Swine Study	1050	0.15
Midvale slag	EPA Region VIII Swine Study	591	0.18
Murray Smelter (slag)	EPA Region VIII Swine Study	695	0.51
Murray Smelter (soil)	EPA Region VIII Swine Study	310	0.34
Palmerton soil (location 2)	EPA Region VIII Swine Study	110	0.39
Palmerton soil (location 4)	EPA Region VIII Swine Study	134	0.52
Clark Fork tailings (GK)	EPA Region VIII Swine Study	181	0.49
Oklahoma calcine/soil 1	U. MO. Swine Study	11300	0.03
Oklahoma calcine/soil 2	U. MO. Swine Study	17500	0.03
Oklahoma calcine/soil 3	U. MO. Swine Study	13500	0.08
Oklahoma calcine/soil 4	U. MO. Swine Study	11500	0.22
Oklahoma calcine/soil 5	U. MO. Swine Study	6250	0.30
Oklahoma iron slag 3	U. MO. Swine Study	1180	0.29
Oklahoma Iron slag 4	U. MO. Swine Study	5020	0.30
Oklahoma Iron slag 5	U. MO. Swine Study	4650	0.16
Anaconda soil	Battelle Rabbit Study	3900	0.48
Anaconda soil	Battelle Monkey	410	0.20

(residential)	Study		
Anaconda House Dust	Battelle Monkey Study	170	0.28
Pure arsenic trioxide in rat food	Harrison et al. (1956) Rat Study	Not known	0.11
Soil in vicinity of historical sheep dip	Ng et al. (1998) Rat Study	32-295	0.10

There are few studies in the literature of the bioavailability of arsenic from aged soil matrices into which soluble arsenic compounds were historically released. It is known that such compounds bind to soil. For instance, WHO (1981) states:

Arsenate ions are readily sorbed by hydrous oxides of iron and aluminum and thus leaching of arsenate is slow. Absorption appears to be a major factor in the retention of arsenic in soils. Similarly, Hindmarsh and McCurdy (1986) state:

These arsenicals form very insoluble and stable complexes in soil systems which contribute to their long residence time (9400 years). Organic and inorganic arsenicals in soil behave similarly. They react with iron in conjunction with clay and other particles or with various cations in soil to form insoluble complexes.

Only four studies were found in the literature. As presented below, RAFs are derived from each.

Harrison et al. (1956) Study

Harrison et al. (1956) determined the LD₅₀ in albino rats of crude arsenic trioxide (97.7% pure) and pure arsenic trioxide (99.999+% pure). In one experiment, the arsenic trioxide was dissolved in water and given by gavage to 40 animals in four dose groups of ten animals each. In another experiment, the arsenic trioxide was given in dry form as a supplement to the food in 140 animals in seven dose groups of twenty each. The 96-hour LD₅₀ was determined for each of the four experiments. As shown below, the LD₅₀ was markedly reduced when given in food as compared to aqueous solution. All animals in the highest dose groups were dead at 96 hours, so sufficient time was allowed for the acute toxic effects of trivalent arsenic to manifest.

TABLE 2
COMPARISON OF LETHAL DOSES TO RATS OF ARSENIC TRIOXIDE

Compound Tested	LD₅₀ Aqueous Solution	LD₅₀ Food Supplement
Crude Arsenic Trioxide	23.6 mg/kg	214 mg/kg
Pure Arsenic Trioxide	15.1 mg/kg	145.2 mg/kg

Because the dose-response values for arsenic are based on ingestion of dissolved arsenic in drinking water, estimates of relative bioavailability of trivalent arsenic can be made from the above data. For the crude arsenic trioxide, the ratio of the lethal dose for food administration versus administration of an aqueous solution is 0.11. For the pure arsenic, the ratio is similar, 0.10. Accordingly, the estimate of the RAF for pure trivalent arsenic compounds is 0.11.

In this experiment, no soil was used, but the addition of the soluble arsenic species to food and administered immediately to animals without aging greatly overestimates the binding that would be expected to soil after years of ageing. Accordingly, this estimate is appropriate to use for the RAF of soluble arsenicals in soil.

Ng et al. (1998) Study

Ng et al. (1998) measured the absolute absorption of arsenic in soils near a former sheep dip. Five soil samples near the sheep dip site contained arsenic at concentrations of 55, 32, 165, 295, and 67 mg/kg total arsenic. It should be noted that native soils in this area may also be naturally high in arsenic due to the presence of specific geological formations that are known to occur elsewhere in Australia.

Male Wistar rats were given soil suspended in water by gavage in groups of five rats at a dose of 0.5 mg As/kg body weight. As positive controls, groups of four rats were given the equivalent dose of arsenic by intravenous injection of 0.5 mg As/kg body weight in the form of a solution of sodium arsenite (As III) or sodium arsenate (As III). All animals were given water and food *ad libitum*. 24- hour urine samples free from fecal contamination were collected daily for four days post dosing. Absolute absorption was determined by calculating the area under the urinary arsenic curve (AUC) for measurements taken at 0, 24, 48, 72 and 96 hours. The absolute absorption was determined as:

$$\% \text{ Absolute Absorption (Bioavailability)} = 100 \times \text{AUC}_{\text{oral}} / \text{AUC}_{\text{intravenous}}$$

TABLE 3
ABSOLUTE ABSORPTION OF ARSENIC IN SOIL NEAR SHEEP DIP

Soil Sample Near Sheep Dip	Absolute Absorption (%)
C1	10.81
C2	5.57
C3	12.55
C4	7.00
C5	12.56

The average absolute absorption (absolute bioavailability) of arsenic from soils near a former sheep dip site is 10%. Because the estimated absolute absorption of arsenic in humans from drinking water in the dose-response studies is 100%, the RAF is $10\%/100\% = 0.10$.

This RAF is based on an animal study of aged soils in which soluble trivalent arsenic compounds were released due to the former use of the area as a sheep dip. However, it cannot be ruled out that some of the arsenic present in the soil was naturally present from rock and soil formations.

Roberts, et al. (2002) Study

Roberts, et al. (2002) measured arsenic bioavailability from soils affected by releases of soluble arsenic salts in *Cebus apella* monkeys in a study for the Florida Department of Environmental Protection. Soil samples were taken from five sites with arsenic contaminated soil from different sources, but all from arsenical salts: (1) electrical substation, (2) cattle dip site, (3) pesticide site #1, (4) wood treatment site, and (5) pesticide site #2. Relative bioavailability was assessed based on urinary excretion following an oral dose in solution. Relative bioavailability for the five sites was: (1) 0.146 +/- 0.05, (2) 0.247 +/- 0.03, (3) 0.107 +/- 0.05, (4) 0.163 +/- 0.07, and (5) 0.17 +/- 0.10. The mean of these five soil types was 0.17. Relative bioavailability of the soil from the wood treatment site was 0.16.

Casteel et al. (2001) Study

Casteel et al. measured the relative bioavailability of arsenic in soils affected by a release of the arsenical herbicide PAX in swine in a study for the U.S. EPA. The relative bioavailability compared to arsenic salts in water varied from 0.18 to 0.45 in five samples.

Summary

RAFTs presented above range from 0.03 to 0.51. The most health-protective use of the above data is to use the maximum value listed above, 0.51, as a conservative default oral-soil RAF.

RAF (Dermal-Soil)

The RAF (dermal-soil) for this chemical is defined as: (absorption in humans from dermal contact with soil) / (absorption of arsenic in humans in the epidemiological study from ingested water). The RAF (dermal-soil) of 0.009 is derived below.

To derive the RAF (dermal-soil), AMEC uses the estimates of the fractional dermal absorption of arsenic from soil reported by Wester et al. (1993). Wester et al. (1993) measured the skin uptake of soluble arsenic (H_3AsO_4) from soil in monkey skin *in vivo* and in human skin *in vitro*. Radiolabelled arsenic was mixed with Yolo County 65-California-57-8 soil at two concentrations: 0.001 mg/kg and 15 mg/kg. The soil retained by an 80-mesh sieve was 26% sand, 26% clay, 48% silt, and 0.9% organic matter. Soil load on the skin was 40 mg/cm². For each dose of arsenic, four female Rhesus monkeys were administered the arsenic containing soil on abdominal skin. The area was covered with a nonocclusive cover. After 24 hours, the soil was removed from the skin, and the area was washed with soap and water. Urine was collected for 7 days. *In vivo* percutaneous absorption was determined by the ratio of urinary excretion following topical administration to that following intravenous administration. Percutaneous absorption of arsenic from soil was 4.5 +/- 3.2% from the low dose and 3.2 +/- 1.9% from the high dose. Soap and water washes removed most of the administered dose after the 24 hour exposure period.

Percutaneous absorption was also measured in viable human cadaver skin dermatomed to 500 um. The skin was preserved and used within five days of collection. Measurements were taken in triplicate for each of three skin samples. The arsenic dose

was 0.001 mg/kg and the soil loading was 40 mg/cm². After a 24-hour exposure period, the amount of arsenic present in the receptor fluid (phosphate buffered saline) plus the amount in the skin that was not removed by a surface wash was 0.76% of the administered dose.

The dermal-soil RAF is calculated by using all three results from Wester et al. (1993):

4.5% monkey *in vivo*, low dose
3.2% monkey *in vivo*, high dose
0.8% human *in vitro*, low dose

The average fractional absorption over 24 hours is 2.8%. Typical exposures at industrial sites are not 24 hours in length. Thus, the above data are prorated to a more reasonable exposure period of 8 hours. The average fractional absorption over 8 hours is 0.94%. The dermal-soil RAF is calculated as follows:

$$\text{RAF (Dermal-Soil)} = (0.944\%) / (100\%) = 0.009.$$

Summary of Derived RAFs for Arsenic

Oral-Soil	0.51
Dermal-Soil	0.009

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