

SAT Initiative: Lincoln Park Elementary School (Muskegon, Michigan)

This document describes the analysis of air monitoring and other data collected under EPA's initiative to assess potentially elevated air toxics levels at some of our nation's schools. The document has been prepared for technical audiences (e.g., risk assessors, meteorologists) and their management. It is intended to describe the technical analysis of data collected for this school in clear, but generally technical, terms. A summary of this analysis is presented on the page focused on this school on EPA's website (www.epa.gov/schoolair).

I. Executive Summary

- Air monitoring has been conducted at Lincoln Park Elementary School as part of the EPA initiative to monitor specific air toxics in the outdoor air around priority schools in 22 states and 2 tribal areas.
- This school was selected for monitoring based on information indicating the potential for elevated ambient concentrations of nickel, hexavalent chromium, and cobalt in air outside the school. That information included EPA's recently completed 2002 National-Scale Air Toxics Assessment (NATA). Additionally, the school was ranked in the top 25 on the USA Today list due to 2005 Toxics Release Inventory (TRI) estimates of nickel and cobalt emissions for a nearby metals processing facility.
- Air monitoring for nickel, hexavalent chromium, cobalt and other metals in particulate matter less than 10 microns (PM₁₀) was performed from July 30, 2009 to November 24, 2009.
- Although the levels of nickel (PM₁₀), hexavalent chromium, and cobalt (PM₁₀) measured in the outdoor air at this school indicate influence of a nearby source, the levels measured and associated longer-term concentration estimates are below levels of significant concern for short- and long-term exposures. They are not as high as suggested by the information available prior to monitoring.
- Based on the analysis described here, EPA will not extend air toxics monitoring at this school.
- The Michigan Department of Natural Resources and the Environment (DNRE) will continue to oversee industrial facilities in the area through air permits and other programs.

II. Background on this Initiative

As part of an EPA initiative to implement Administrator Lisa Jackson's commitment to assess potentially elevated air toxics levels at some of our nation's schools, EPA and state and local air pollution control agencies are monitoring specific (key) air toxics in the outdoor air around priority schools in 22 states and 2 tribal areas (<http://www.epa.gov/schoolair/schools.html>).

- The schools selected for monitoring include some schools that are near large industries that are sources of air toxics, and some schools that are in urban areas, where emissions

of air toxics come from a mix of large and small industries, cars, trucks, buses and other sources.

- EPA selected schools based on information available to us about air pollution in the vicinity of the school, including results of the 2002 National-Scale Air Toxics Assessment (NATA), results from a 2008 USA Today analysis on air toxics at schools, and information from state and local air agencies. The analysis by USA Today involved use of EPA's Risk Screening Environmental Indicators tool and Toxics Release Inventory (TRI) for 2005.
 - Available information had raised some questions about air quality near these schools that EPA concluded merited investigation. In many cases, the information indicated that estimated long-term average concentrations of one or more air toxics were above the upper end of the range that EPA generally considers as acceptable (e.g., above 1-in-10,000 cancer risk for carcinogens).
- Monitors are placed at each school for approximately 60 days, and take air samples on at least 10 different days during that time. The samples are analyzed for specific air toxics identified for monitoring at the school (i.e., key pollutants).¹
- These monitoring results and other information collected at each school during this initiative allow us to:
 - assess specific air toxics levels occurring at these sites and associated estimates of longer-term concentrations in light of health risk-based criteria for long-term exposures,
 - better understand, in many cases, potential contributions from nearby sources to key air toxics concentrations at the schools,
 - consider what next steps might be appropriate to better understand and address air toxics at the school, and
 - improve the information and methods we will use in the future (e.g., NATA) for estimating air toxics concentrations in communities across the U.S.

Assessment of air quality under this initiative is specific to the air toxics identified for monitoring at each school. This initiative is being implemented in addition to ongoing state, local and national air quality monitoring and assessment activities, including those focused on criteria pollutants (e.g., ozone and particulate matter) or existing, more extensive, air toxics programs.

Several technical documents prepared for this project provide further details on aspects of monitoring and data interpretation and are available on the EPA website (e.g., www.epa.gov/schoolair/techinfo.html). The full titles of these documents are provided here:

- *School Air Toxics Ambient Monitoring Plan*
- *Quality Assurance Project Plan For the EPA School Air Toxics Monitoring Program*
- *Schools Air Toxics Monitoring Activity (2009), Uses of Health Effects Information in Evaluating Sample Results*

¹ In analyzing air samples for these key pollutants, samples are also being analyzed for some additional pollutants that are routinely included in the analytical methods for the key pollutants.

Information on health effects of air toxics being monitored² and educational materials describing risk concepts³ are also available from EPA's website.

III. Basis for Selecting this School and the Air Monitoring Conducted

This school was selected for monitoring in consultation with the state air agency, DNRE. We were interested in evaluating the ambient concentrations of nickel and hexavalent chromium in air outside the school because EPA's 2002 NATA analysis indicated the potential for levels of concern due to estimates of nickel and hexavalent chromium emissions in the 2002 National Emissions Inventory for a nearby metals processing facility. Additionally, the school was ranked in the top 25 on the USA Today list due to estimates of cobalt and nickel emissions in the 2005 TRI for the same facility.

Monitoring commenced at this school on July 30, 2009 and continued through November 24, 2009. During this period, ten samples of airborne particles were collected using a PM₁₀ sampler.⁴ The samples were analyzed for nickel and cobalt (two of the key pollutants at this school) and for a small standardized set of additional metals that are routinely included in the analytical methods for the key pollutants. Additionally, sixteen air samples were collected and analyzed for hexavalent chromium (another key pollutant at this school). All sampling methodologies are described in EPA's schools air toxics monitoring plan (<http://www.epa.gov/schoolair/techinfo.html>).⁵

IV. Monitoring Results and Analysis

A. Background for the Analysis

The majority of schools being monitored in this initiative were selected based on modeling analyses that indicated the potential for annual average air concentrations of some specific (key) hazardous air pollutants (HAPs or air toxics)⁶ to be of particular concern based on approaches that are commonly used in the air toxics program for considering potential for long-term risk. For example, such analyses suggested annual average concentrations of some air toxics were greater than long-term risk-based concentrations associated with an additional cancer risk greater than 10-in-10,000 or a hazard index on the order of or above 10. To make projections of air concentrations, the modeling analyses combined estimates of air toxics emissions from

² For example, <http://www.epa.gov/schoolair/pollutants.html>, http://www.epa.gov/ttn/fera/risk_atoxic.html.

³ For example, http://www.epa.gov/ttn/atw/3_90_022.html, http://www.epa.gov/ttn/atw/3_90_024.html.

⁴ In general this sampler collects airborne particles with a diameter of 10 microns or smaller, more of which would be considered to be in the respirable range which is what the health-based comparison levels for nickel and cobalt are based on.

⁵ City of Grand Rapids air monitoring staff, in conjunction with the DNRE operated the monitors and sent the filters to the analytical laboratory under contract to EPA.

⁶ The term hazardous air pollutants (commonly called HAPs or air toxics) refers to pollutants identified in section 112(b) of the Clean Air Act which are the focus of regulatory actions involving stationary sources described by CAA section 112 and are distinguished from the six pollutants for which criteria and national ambient air quality standards (NAAQS) are developed as described in section 108. One of the criteria pollutants, lead, is also represented, as lead compounds, on the HAP list.

industrial, motor vehicle and other sources, with past measurements of winds, and other meteorological factors that can influence air concentrations, from a weather station in the general area. In some cases, the weather station was very close (within a few miles), but in other cases, it was much further away (e.g., up to 60 miles), which may contribute to quite different conditions being modeled than actually exist at the school. The modeling analyses are intended to be used to prioritize locations for further investigation.

The primary objective of this initiative is to investigate - through monitoring air concentrations of key air toxics at each school over a 2-3 month period - whether levels measured and associated longer-term concentration estimates are of a magnitude, in light of health risk-based criteria, for which follow-up activities may need to be considered. To evaluate the monitoring results consistent with this objective, we developed health risk-based air concentrations (the long-term comparison levels summarized in Appendix A) for the monitored air toxics using established EPA methodology and practices for health risk assessment⁷ and, in the case of cancer risk, consistent with the implied level of risk considered in identifying schools for monitoring. Consistent with the long-term or chronic focus of the modeling analyses, based on which these schools were selected for monitoring, we have analyzed the full record of concentrations of air toxics measured at this school, using routine statistical tools, to derive a 95 percent confidence interval⁸ for the estimate of the longer-term average concentration of each of these pollutants. In this project, we are reporting all actual numerical values for pollutant concentrations including any values below method detection limit (MDL).⁹ Additionally, a value of 0.0 is used when a measured pollutant has no value detected (ND). The projected range for the longer-term concentration estimate for each chemical (most particularly the upper end of the range) is compared to the long-term comparison levels. These long-term comparison levels conservatively presume continuous (all-day, all-year) exposure over a lifetime. The analysis of the air concentrations also includes a consideration of the potential for cumulative multiple pollutant impacts.¹⁰ In general, where the monitoring results indicate estimates of longer-term

⁷ While this EPA initiative will rely on EPA methodology, practices, assessments and risk policy considerations, we recognize that individual state methods, practices and policies may differ and subsequent analyses of the monitoring data by state agencies may draw additional or varying conclusions.

⁸ When data are available for only a portion of the period of interest (e.g., samples not collected on every day during this period), statisticians commonly calculate the 95% confidence interval around the dataset mean (or average) in order to have a conservative idea of how high or low the “true” mean may be. More specifically, this interval is the range in which the mean for the complete period of interest is expected to fall 95% of the time (95% probability is commonly used by statisticians). The interval includes an equal amount of quantities above and below the sample dataset mean. The interval that includes these quantities is calculated using a formula that takes into account the size of the dataset (i.e., the ‘n’) as well as the amount by which the individual data values vary from the dataset mean (i.e., the “standard deviation”). This calculation yields larger confidence intervals for smaller datasets as well as ones with more variable data points. For example, a dataset including {1.0, 3.0, and 5.0}, results in a mean of 3.0 and a 95% confidence interval of 3.0 +/- ~5 (or -2.0 to 8.0). For comparison purposes, a dataset including {2.5, 3 and 3.5} results in a mean of 3.0 and a 95% confidence interval of 3.0 +/- ~1.2 (or 1.8 to 4.2). The smaller variation within the data in the second set of values causes the second confidence interval to be smaller.

⁹ Method detection limit (MDL) is the minimum concentration of a substance that can be measured and reported with 99% confidence that the pollutant concentration is greater than zero and is determined from the analysis of a sample in a given matrix containing the pollutant.

¹⁰ As this analysis of a 2-3 month monitoring dataset is not intended to be a full risk assessment, consideration of potential multiple pollutant impacts may differ among sites. For example, in instances where no individual pollutant appears to be present above its comparison level, we will also check for the presence of multiple pollutants at levels just below their respective comparison levels (giving a higher priority to such instances).

average concentrations that are above the comparison levels - i.e., above the cancer-based comparison levels or notably above the noncancer-based comparison levels - we will consider the need for follow-up actions such as:

- Additional monitoring of air concentrations and/or meteorology in the area,
- Evaluation of potentially contributing sources to help us confirm their emissions and identify what options (regulatory and otherwise) may be available to us to achieve emissions reductions, and
- Evaluation of actions being taken or planned nationally, regionally or locally that may achieve emission and/or exposure reductions. An example of this would be actions taken to address the type of ubiquitous emissions that come from mobile sources.

We have further analyzed the dataset to describe what it indicates in light of some other criteria and information commonly used in prioritizing state, local and national air toxics program activities. State, local and national programs often develop long-term monitoring datasets in order to better characterize pollutants near particular sources. The 2-3 month dataset developed under this initiative will be helpful to those programs in setting priorities for longer-term monitoring projects. The intent of this analysis is to make this 2-3 month monitoring dataset as useful as possible to state, local and national air toxics programs in their longer-term efforts to improve air quality nationally. To that end, this analysis:

- Describes the air toxics measurements in terms of potential longer-term concentrations, and, as available, compares the measurements at this school to monitoring data from national monitoring programs.
- Describes the meteorological data by considering conditions on sampling days as compared to those over all the days within the 2-3 month monitoring period and what conditions might be expected over the longer-term (as indicated, for example, by information from a nearby weather station).
- Describes available information regarding activities and emissions at the nearby source(s) of interest, such as that obtained from public databases such as TRI and/or consultation with the local air pollution authority.

B. Chemical Concentrations

We developed two types of long-term health risk-related comparison levels (summarized in Appendix A below) to address our primary objective. The primary objective is to investigate through the monitoring data collected for key pollutants at the school, whether pollutant levels measured and associated longer-term concentration estimates are elevated enough in comparison with health risk-based criteria to indicate that follow-up activities be considered. These comparison levels conservatively presume continuous (all-day, all-year) exposure over a lifetime.

In developing or identifying these comparison levels, we have given priority to use of relevant and appropriate air standards and EPA risk assessment guidance and precedents.¹¹ These levels

¹¹ This is described in detail in *Schools Air Toxics Monitoring Activity (2009), Uses of Health Effects Information in Evaluating Sample Results*

are based upon health effects information, exposure concentrations and risk estimates developed and assessed by EPA, the U.S. Agency for Toxic Substances and Disease Registry, and the California EPA. These agencies recognize the need to account for potential differences in sensitivity or susceptibility of different groups (e.g., asthmatics) or lifestyles/ages (e.g., young children or the elderly) to a particular pollutant's effects so that the resulting comparison levels are relevant for these potentially sensitive groups as well as the broader population.

In addition to evaluating individual pollutants with regard to their corresponding comparison levels, we also considered the potential for cumulative impacts from multiple pollutants in cases where individual pollutant levels fall below the comparison levels but where multiple pollutant mean concentrations are within an order of magnitude of their comparison levels.

Using the analysis approach described above, we analyzed the chemical concentration data (Table 1 and Figures 1a-1c) with regard to areas of interest identified below.

Key findings drawn from the information on chemical concentrations and the considerations discussed below include:

- The air sampling data collected over the 4-month sampling period and the related longer-term concentration estimates of nickel, hexavalent chromium and cobalt at this school, while indicating influence from a nearby source, are below concentrations of significant concern for short- and long-term exposures.

Nickel, key pollutant:

- Do the monitoring data indicate influence from a nearby source?
 - The monitoring data include several nickel concentrations that are higher than concentrations commonly observed in other locations nationally.¹² As discussed in section IV.C below, on the days on which higher concentrations were measured and wind data are available, the wind information indicates winds from the direction of a nearby source.
- Do the monitoring data indicate elevated levels that pose significant long-term health concerns?
 - The monitoring data for nickel at this school do not indicate levels of significant health concern for long-term exposures.
 - The estimate of longer-term nickel concentration (i.e., the upper bound of the 95 percent confidence interval on the mean of the dataset) is well below both of the long-term comparison levels (Table 1).¹³ These comparison levels are

¹² For example, three of the concentrations at this site (Table 2) were higher than 75 percent of samples collected at the National Air Toxics Trends Stations (NATTS) from 2004-2008 (Appendix B). Because these NATTS sites are generally sited so as to not be influenced by specific nearby sources, EPA is using the 75th percentile point of concentrations at these sites as a benchmark for indicating potential influence from a source nearby to the school.

¹³ The upper end of the interval is approximately two times the mean of the monitoring data, but less than 8% of the long-term noncancer-based comparison level and less than 2% of the long-term cancer-based comparison level.

based on consideration of continuous exposure concentrations (24 hours a day, all year, over a lifetime).

- Further, the longer-term concentration estimate is more than tenfold lower than the cancer-based comparison level, indicating the longer-term estimate is below a continuous (24 hours a day, 7 days a week) lifetime exposure concentration associated with 1-in-100,000 additional cancer risk.
- We did not identify any concerns regarding short-term exposures as each individual measurement is below the individual sample screening level for nickel (which is based on consideration of exposure all day, every day over a period ranging from a couple of weeks to longer for some pollutants).¹¹
- In summary, the individual measurements of nickel do not indicate concentrations of concern for short-term exposures; the combined contributions of all individual measurements in the estimate of longer-term concentration do not indicate a level of significant concern for long-term exposure.

Hexavalent Chromium, key pollutant:

- Do the monitoring data indicate influence from a nearby source?
 - The monitoring data include some hexavalent chromium concentrations that are higher than concentrations commonly observed in other locations nationally.¹⁴ As discussed in section IV.C below, on the days on which higher concentrations were measured and wind data are available, the wind information indicates winds from the direction of a nearby source.
- Do the monitoring data indicate elevated levels that pose significant long-term health concerns?
 - The monitoring data for hexavalent chromium at this school do not indicate levels of significant health concern for long-term exposures.
 - The estimate of longer-term hexavalent chromium concentration (i.e., the upper bound of the 95 percent confidence interval on the mean of the dataset) is well below both of the long-term comparison levels (Table 1).¹⁵ These comparison levels are continuous exposure concentrations (24 hours a day, all year, over a lifetime).
 - Further, the longer-term concentration estimate is more than tenfold lower than the cancer-based comparison level, indicating the longer-term estimate is below a continuous (24 hours a day, 7 days a week) lifetime exposure concentration associated with 1-in-100,000 additional cancer risk.

¹⁴ For example, six of the concentrations at this site (Table 2) were higher than 75 percent of samples collected at the National Air Toxics Trends Stations (NATTS) from 2004-2008 (Appendix B). Because these NATTS sites are generally sited so as to not be influenced by specific nearby sources, EPA is using the 75th percentile point of concentrations at these sites as a benchmark for indicating potential influence from a source nearby to the school.

¹⁵ The upper end of the interval is a little more than two times the mean of the monitoring data, but less than 5% of the long-term cancer-based comparison level and less than 1% of the long-term noncancer-based comparison level.

- We did not identify any concerns regarding short-term exposures as each individual measurement is below the individual sample screening level for hexavalent chromium (which is based on consideration of exposure all day, every day over a period ranging from a couple of weeks to longer for some pollutants).¹¹
- In summary, the individual measurements of hexavalent chromium do not indicate concentrations of concern for short-term exposures; the combined contributions of all individual measurements in the estimate of longer-term concentration do not indicate a level of significant concern for long-term exposure.

Cobalt, key pollutant:

- Do the monitoring data indicate influence from a nearby source?
 - The monitoring data include several cobalt concentrations that are higher than concentrations commonly observed in other locations nationally.¹⁶ As discussed in section IV.C below, on the days on which higher concentrations were measured and wind data are available, the wind information indicates winds from the direction of a nearby source.
- Do the monitoring data indicate elevated levels that pose significant long-term health concerns?
 - The monitoring data for cobalt do not indicate levels of health concern for long-term exposures.
 - The estimate of longer-term cobalt concentration (i.e., the upper bound of the 95 percent confidence interval on the mean of the dataset) is well below the long-term comparison level (Table 1).¹⁷ This comparison level is a continuous exposure concentration (24 hours a day, all year, over a lifetime) associated with little risk of adverse effect; it is not an exposure concentration at which effects have been observed or are predicted to occur.¹⁸
 - As cobalt has not been found to be carcinogenic, it has no cancer-based comparison level.
 - We did not identify any concerns regarding short-term exposures as each individual measurement is below the individual sample screening level for cobalt (which is based on consideration of exposure all day, every day over a period ranging from a couple of weeks to longer for some pollutants).¹¹
 - In summary, the individual measurements of cobalt do not indicate concentrations of concern for short-term exposures; the combined contributions of all individual

¹⁶ For example, five of the concentrations at this site (Table 2) were higher than 75 percent of samples collected at the National Air Toxics Trends Stations (NATTS) from 2004-2008 (Appendix B). Because these NATTS sites are generally sited so as to not be influenced by specific nearby sources, EPA is using the 75th percentile point of concentrations at these sites as a benchmark for indicating potential influence from a source nearby to the school.

¹⁷ The upper end of the interval is approximately two times the mean of the monitoring data, but less than 2% of the long-term noncancer-based comparison level.

¹⁸ The comparison level for cobalt is based on the ATSDR MRL. Cobalt concentrations at which health effects have been documented are higher than the MRL (<http://www.atsdr.cdc.gov/tfacts33.html>, <http://www.epa.gov/ttn/atw/hlthef/cobalt.html#conversion>)

measurements in the estimate of longer-term concentration do not indicate a level of concern for long-term exposure.

Other Air Toxics

- Do the monitoring data indicate elevated levels of any other air toxics (or HAPs) that pose significant long-term health concerns?
 - The monitoring data show low levels of the other HAPs monitored, with longer-term concentration estimates for these HAPs below their long-term comparison levels (Appendix C). Additionally, each individual measurement for these pollutants is below the individual sample screening level¹¹ for that pollutant.

Multiple Pollutants:

- Do the data collected for the air toxics monitored indicate the potential for other monitored pollutants to be present at levels that in combination with the key pollutant levels indicate an increased potential for cumulative impacts of significant concern (e.g., that might warrant further investigation)?
 - The data collected for the key and other air toxics and the associated longer-term concentration estimates do not pose significant concerns for cumulative health risk from these pollutants (Appendix C).¹⁹

C. Wind and Other Meteorological Data

At each school monitored as part of this initiative, we are collecting meteorological data, minimally for wind speed and direction, during the sampling period. Additionally, we have identified the nearest National Weather Service (NWS) station at which a longer record is available.

In reviewing these data at each school in this initiative, we are considering if these data indicate that the general pattern of winds on our sampling dates are significantly different from those occurring across the full sampling period or from those expected over the longer-term. Additionally, we are noting, particularly for school sites where the measured chemical concentrations show little indication of influence from a nearby source, whether wind conditions on some portion of the sampling dates were indicative of a potential to capture contributions from the nearby “key” source in the air sample collected.

The meteorological station at Lincoln Park Elementary School collected wind speed and wind direction measurements beginning on June 30, 2009, continuing through the sampling period (July 30, 2009–November 24, 2009), and ending on April 26, 2010. As a result, on-site data for

¹⁹ We note that this initiative is focused on investigation for a school-specific set of key pollutants indicated by previous analyses (and a small set of others for which measurements are obtained in the same analysis). Combined impacts of pollutants or stressors other than those monitored in this project is a broader area of consideration in other EPA activities. General information on additional air pollutants is available at <http://www.epa.gov/air/airpollutants.html>

these meteorological parameters are available for all dates of sample collection, and also for a period before and after the sampling period, producing a continuous record of nearly ten months of on-site meteorological data. The meteorological data collected at the school site on sampling days are presented in Figures 2a-2c and Table 2.

The nearest NWS station is at Muskegon County Airport in Muskegon, Michigan. This station is approximately 3.55 miles southeast of the school. Measurements taken at that station include wind, temperature, and precipitation. Wind speed and direction data collected at the Muskegon County Airport NWS station have been summarized in Table 2 and Appendix E.

Key findings drawn from this information and the considerations discussed below include:

- Both the sampling results and the on-site wind data indicate that some of the air samples were collected on days when the nearby key source was contributing to conditions at the school location.
 - The wind patterns at the monitoring site across sampling dates are generally similar to those observed across the record of on-site meteorological data during the sampling period.
 - Our ability to provide a confident characterization of the wind flow patterns at the monitoring site over the long-term is somewhat limited. However, the NWS station in Muskegon County Airport appears to represent the specific wind flow patterns at the school location.
 - Although we lack long-term wind data at the monitoring site, the wind pattern at the NWS station during the sampling period is generally similar to the historical long-term wind flow pattern at that location. This and the 10-month wind data at the school suggest that, on a regional scale, the 3-month sampling period may be representative of year-round wind patterns.
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- What is the direction of the key source of nickel, hexavalent chromium, and cobalt emissions in relation to the school location?
 - The nearby industrial facility emitting the key pollutants into the air (described in section III above) lies less than 1 mile west-northwest of the school.
 - Using the property boundaries of the full facility (in lieu of information regarding the location of specific sources of nickel, hexavalent chromium, and cobalt emissions at the facility), we have identified an approximate range of wind directions to use in considering the potential influence of this facility on air concentrations at the school.
 - This general range of wind directions, from approximately 260-300 degrees, is referred to here as the expected zone of source influence (ZOI).
 - On days the air samples were collected, how often did wind come from direction of the key source?

- On ten sampling days, a portion of the winds were from the expected ZOI (Figures 2a-2c, Table 2).
- We note that the highest recorded concentrations for all three key pollutants were on sampling days in which the air was coming from the source of interest, with 67 percent of the hourly winds within the expected ZOI. Also, the two highest concentrations for each key pollutant was higher than 75 percent of samples collected at the NATTS (Appendix B), also indicating that the samples were collected on days when there was a source contribution to air quality at the school site (Table 2).
- How do wind patterns on the air monitoring days compare to those across the complete monitoring period and what might be expected over the longer-term at the school location?
 - Wind patterns across the air monitoring days appear to be generally similar to those observed over the record of on-site meteorological data during the sampling period.
 - We note that wind patterns at the nearest NWS station (at Muskegon County Airport) during the sampling period are generally similar to those recorded at the NWS station over the long-term (2002-2007 period; Appendix E), supporting the idea that regional meteorological patterns in the area during the monitoring period were consistent with long-term patterns. However, there is some uncertainty as to whether this would be the case at the school location because the general wind patterns at the school location are only generally similar to the general wind patterns at the Muskegon County Airport NWS station (see below).
- How do wind patterns at the school compare to those at the Muskegon County Airport station, particularly with regard to prevalent wind directions and the direction of the key source?
 - During the sampling period for which data are available both at the school site and at the reference NWS station (approximately 4 months), prevalent winds at the school site are predominantly from the east and southwest, while those at the NWS station are more from the west northwest, east, and south southwest. The windroses for the two sites during the sampling period (Figures 2a-2c and Appendix E) show similarities in wind flow patterns.
- Are there other meteorological patterns that may influence the measured concentrations at the school monitoring site?
 - No. We did not observe other meteorological patterns that may influence the measured concentrations at the school monitoring site.

V. Key Source Information

- Was the source operating as usual during the monitoring period?
 - The nearby source of nickel, hexavalent chromium, and cobalt (described in section III above) has several permits issued by DNRE that include operating requirements.²⁰
 - Based on the last six years of production data, the facility was operating at a slightly lower rate (84%) during the sampling period.
 - The most recently available chromium emissions for this source (2008 TRI) are lower than those relied upon in previous modeling analysis for this area (e.g., 2002 NATA, 2005 TRI). Conversely, the most recently available nickel and cobalt emissions for this source (2008 TRI) are higher than those relied upon in previous modeling analysis for this area (e.g. 2002 NATA, 2005 TRI).

VI. Integrated Summary and Next Steps

A. Summary of Key Findings

1. What are the key HAPs for this school?
 - Nickel, hexavalent chromium, and cobalt are the key HAPs for this school, identified based on emissions information considered in identifying the school for monitoring.
2. Do the data collected at this school indicate an elevated level of concern, as implied by information that led to identifying this school for monitoring?
 - No. The levels measured and associated longer-term concentration estimates are not as high as suggested by the information available prior to monitoring and are below levels of concern for long-term exposures.
3. Are there indications, e.g., from the meteorological or other data, that the sample set may not be indicative of longer-term air concentrations? Would we expect higher (or lower) concentrations at other times of year?
 - The data we have collected appear to reflect air concentrations during the entire monitoring period, with no indications from the on-site meteorological data that the sampling day conditions were inconsistent with conditions overall during this period.
 - Among the data collected for this site, we have none that would indicate generally higher (or lower) concentrations during other times of year. The wind flow pattern at the nearest NWS station during the sampling period appears to be representative of long-term wind flow at that site. The lack of long-term meteorological data at the school location and our finding that the wind patterns from the nearest NWS station are only generally similar to those at the school, however, limit our ability to confidently predict longer-

²⁰ Operating permits, which are issued to air pollution sources under the Clean Air Act, are described at: <http://www.epa.gov/air/oaqps/permits/>

term wind patterns at the school (which might provide further evidence relevant to concentrations during other times).

B. Next Steps for Key Pollutants

1. Based on the analysis described here, EPA will not extend air toxics monitoring at this school.
2. DNRE (as the agency with primary permitting authority) will continue their oversight of conditions imposed by operating permits for nearby facilities to ensure the conditions are being met.

VII. Figures and Tables

A. Tables

1. Lincoln Park Elementary School – Key Pollutant Analysis.
2. Lincoln Park Elementary School Key Pollutant Concentrations and Meteorological Data.

B. Figures

- 1a. Lincoln Park Elementary School – Key Pollutant (Nickel (PM₁₀)) Analysis.
- 1b. Lincoln Park Elementary School – Key Pollutant (Hexavalent Chromium) Analysis.
- 1c. Lincoln Park Elementary School – Key Pollutant (Cobalt (PM₁₀)) Analysis.
- 2a. Lincoln Park Elementary School (Muskegon, MI) Nickel (PM₁₀) Concentration and Wind Information.
- 2b. Lincoln Park Elementary School (Muskegon, MI) Hexavalent Chromium Concentration and Wind Information.
- 2c. Lincoln Park Elementary School (Muskegon, MI) Cobalt (PM₁₀) Concentration and Wind Information.

VIII. Appendices

- A. Summary Description of Long-term Comparison Levels.
- B. National Air Toxics Trends Stations Measurements (2004-2008).
- C. Analysis of Other (non-key) Air Toxics Monitored at the School and Multiple-pollutant Considerations.
- D. Lincoln Park Elementary School Pollutant Concentrations.
- E. Windroses for Muskegon County Airport NWS Station.

Table 1. Lincoln Park Elementary School - Key Pollutant Analysis.

Parameter	Units	Mean of Measurements	95% Confidence Interval on the Mean	Long-term Comparison Level ^a	
				Cancer-Based ^b	Noncancer-Based ^c
Nickel (PM ₁₀)	ng/m ³	3.35 ^d	0.11 - 6.60	420	90
Hexavalent Chromium	ng/m ³	0.168 ^e	0 - 0.382	8.3 ^f	100
Cobalt (PM ₁₀)	ng/m ³	0.81 ^g	0.16 - 1.46	NA	100

ng/m³ nanograms per cubic meter

NA Not applicable

^a Details regarding these values are in the technical report, Schools Air Toxics Monitoring Activity (2009) Uses of Health Effects Information.

^b Air toxics for which the upper 95% confidence limit on the mean concentration is above this level will be fully discussed in the text and may be considered a priority for potential follow-up activities, if indicated in light of the full set of information available for the site. Findings of the upper 95% confidence limit below 1% of the comparison level (i.e., where the upper 95% confidence limit is below the corresponding 1-in-1-million cancer risk based concentration) are generally considered a low priority for follow-up activity. Situations where the summary statistics for a pollutant are below this comparison level but above 1% of this level are fully discussed in the text of the report.

^c Air toxics for which the upper 95% confidence limit on the mean concentration are near or below the noncancer-based comparison level are generally of low concern and will generally be considered a low priority for follow-up activity. Pollutants for which the 95% confidence limits extend appreciably above the noncancer-based comparison level are fully discussed in the school-specific report and may be considered a priority for follow-up activity, if indicated in light of the full set of information available for the site.

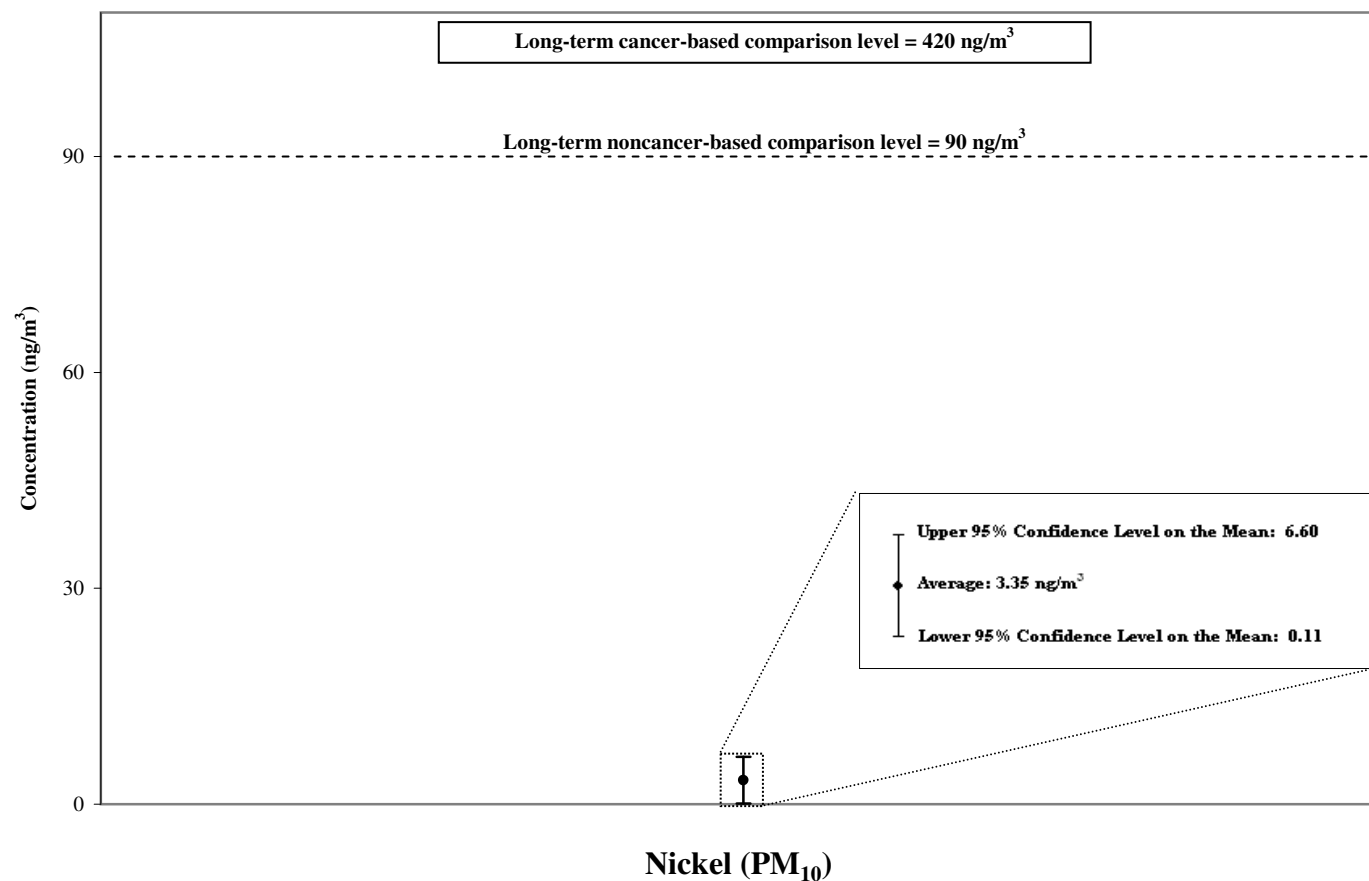
^d The mean of measurements for nickel (PM₁₀) is the average of all sample results, which include ten detections that ranged from 0.10 to 12.6 ng/m³.

^e The mean of measurements for hexavalent chromium is the average of all sample results, which include fourteen detections that ranged from 0.0097 to 1.58 ng/m³. There were, as well, two samples in which no chemical was registered by the laboratory analytical equipment. For these two samples, a value of zero was used in calculating the mean.

^f This comparison value is based on the EPA IRIS cancer assessment. It is noted that the EPA is currently updating this assessment with regard to the mode of action. If the update were to conclude that this chemical is carcinogenic by a mutagenic mode of action, this comparison level would be revised to a slightly lower value of 5.2 ng/m³, consistent with EPA's Supplemental Guidance for Assessing Susceptibility from Early-Life exposure.

^g The mean of measurements for cobalt (PM₁₀) is the average of all sample results, which include ten detections that ranged from 0.02 to 2.28 ng/m³.

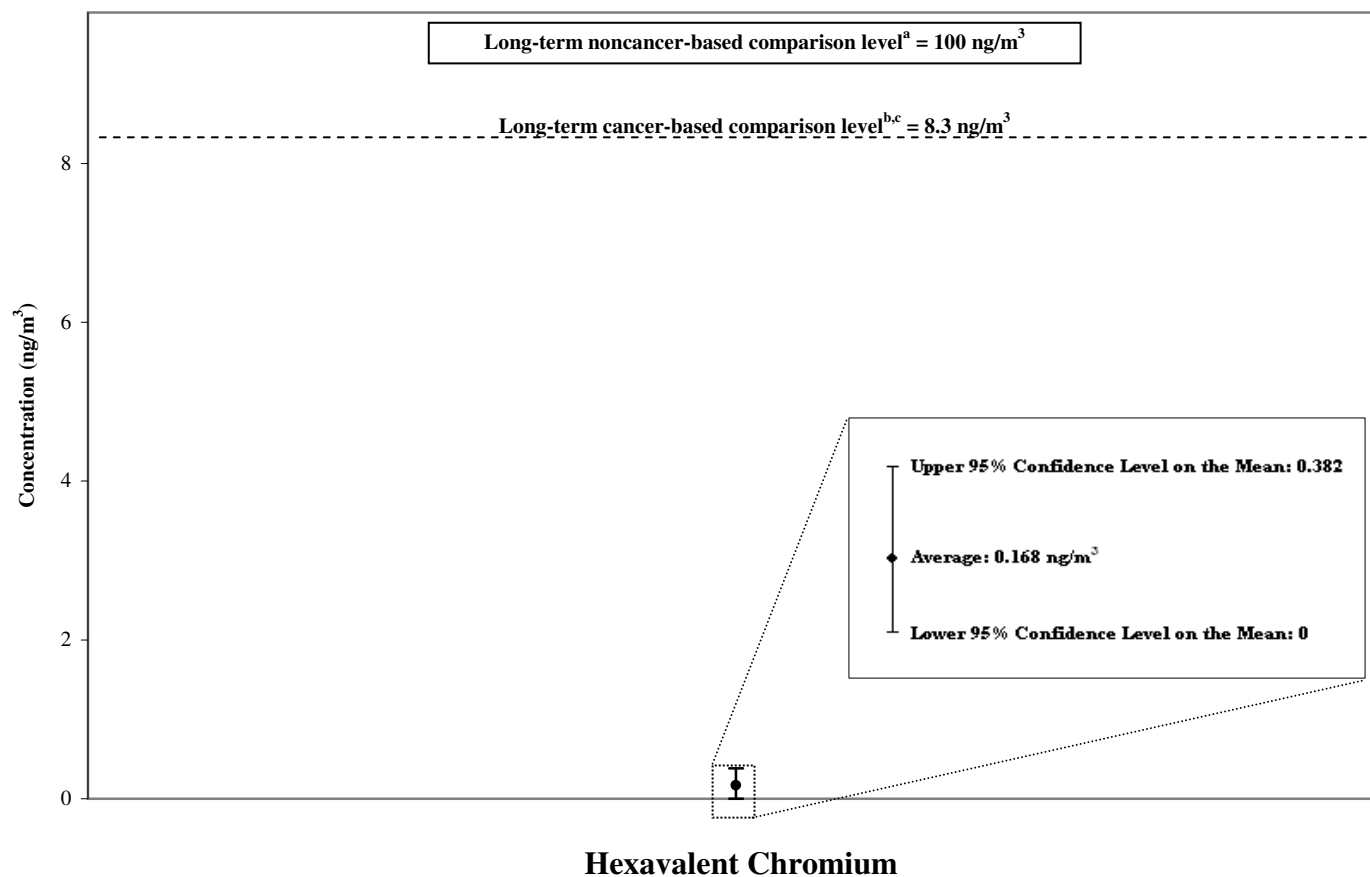
Figure 1a. Lincoln Park Elementary School - Key Pollutant (Nickel (PM₁₀)) Analysis.



^a Air toxics for which the upper 95% confidence limit on the mean concentration is above this cancer-based comparison level will be fully discussed in the text and may be considered a priority for potential follow-up activities, if indicated in light of the full set of information available for the site. Findings of the upper 95% confidence limit below 1% of the comparison level (i.e., where the upper 95% confidence limit is below the corresponding 1-in-1-million cancer risk based concentration) are generally considered a low priority for follow-up activity. Situations where the summary statistics for a pollutant are below this comparison level but above 1% of this level are fully discussed in the text of the report.

^b Air toxics for which the upper 95% confidence limit on the mean concentration are near or below the noncancer-based comparison level are generally of low concern and will generally be considered a low priority for follow-up activity. Pollutants for which the 95% confidence limits extend appreciably above the noncancer-based comparison level are fully discussed in the school-specific report and may be considered a priority for follow-up activity, if indicated in light of the full set of information available for the site.

Figure 1b. Lincoln Park Elementary School - Key Pollutant (Hexavalent Chromium) Analysis.

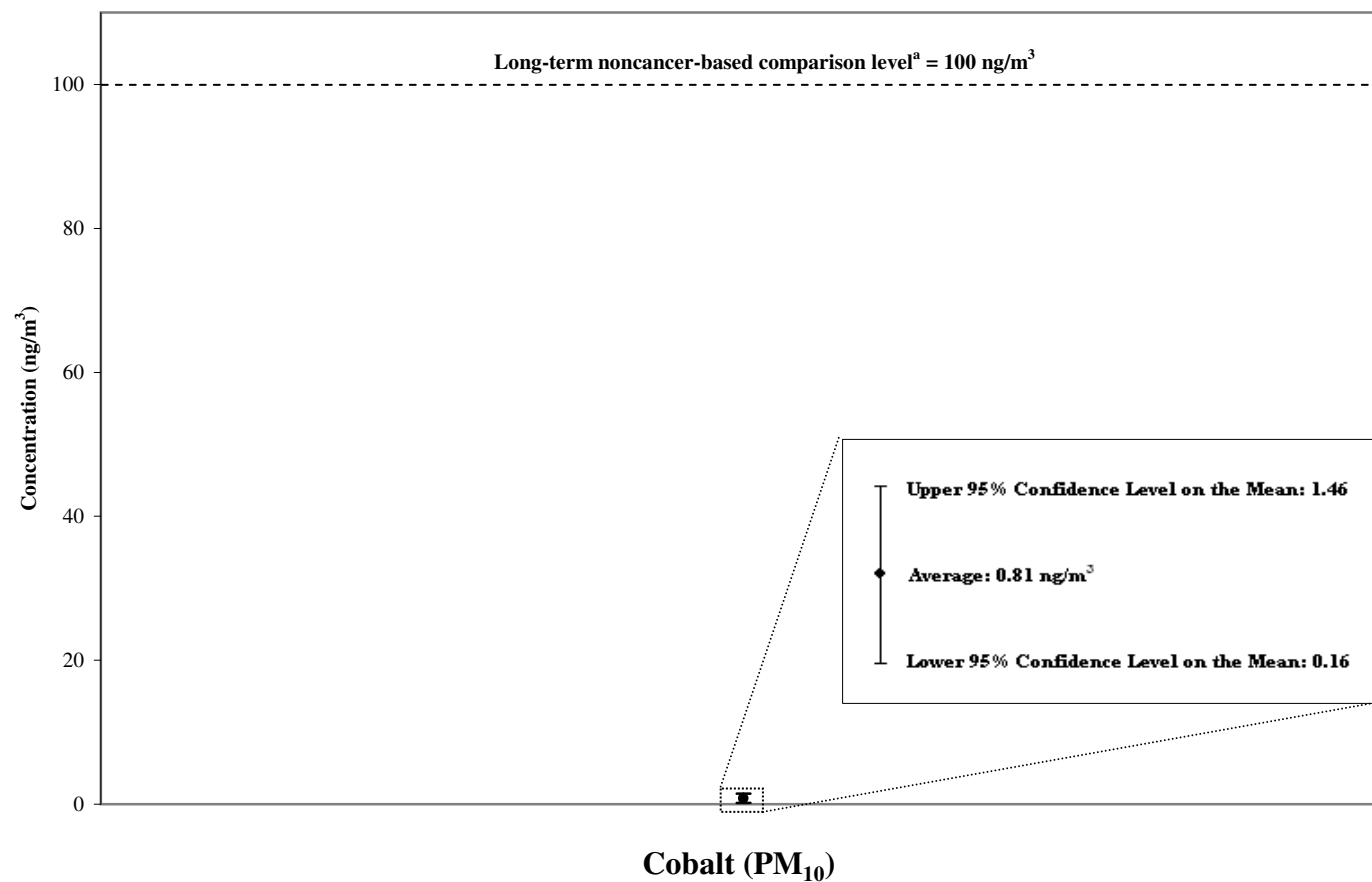


^a Air toxics for which the upper 95% confidence limit on the mean concentration are near or below the noncancer-based comparison level are generally of low concern and will generally be considered a low priority for follow-up activity. Pollutants for which the 95% confidence limits extend appreciably above the noncancer-based comparison level are fully discussed in the school-specific report and may be considered a priority for follow-up activity, if indicated in light of the full set of information available for the site.

^b Air toxics for which the upper 95% confidence limit on the mean concentration is above this cancer-based comparison level will be fully discussed in the text and may be considered a priority for potential follow-up activities, if indicated in light of the full set of information available for the site. Findings of the upper 95% confidence limit below 1% of the comparison level (i.e., where the upper 95% confidence limit is below the corresponding 1-in-1-million cancer risk based concentration) are generally considered a low priority for follow-up activity. Situations where the summary statistics for a pollutant are below this comparison level but above 1% of this level are fully discussed in the text of the report.

^c This comparison value is based on the EPA IRIS cancer assessment. It is noted that the EPA is currently updating this assessment with regard to the mode of action. If the update were to conclude that this chemical is carcinogenic by a mutagenic mode of action, this comparison level would be revised to a slightly lower value of 5.2 ng/m³, consistent with EPA's Supplemental Guidance for Assessing Susceptibility from Early-Life exposure.

Figure 1c. Lincoln Park Elementary School - Key Pollutant (Cobalt (PM₁₀)) Analysis.



^a Air toxics for which the upper 95% confidence limit on the mean concentration are near or below the noncancer-based comparison level are generally of low concern and will generally be considered a low priority for follow-up activity. Pollutants for which the 95% confidence limits extend appreciably above the noncancer-based comparison level are fully discussed in the school-specific report and may be considered a priority for follow-up activity, if indicated in light of the full set of information available for the site.

Table 2. Lincoln Park Elementary School Key Pollutant Concentrations and Meteorological Data.

Parameter	Units	7/30/2009	8/5/2009	8/11/2009	8/17/2009	8/23/2009	9/4/2009	9/10/2009	9/16/2009	9/22/2009	9/28/2009	10/4/2009	10/10/2009	10/16/2009	10/28/2009	11/15/2009	11/24/2009
Nickel (PM ₁₀)	ng/m ³	--	--	--	--	0.47	4.14	1.30	0.47	0.22	10.9	12.6	2.35	0.99	--	--	0.10
Hexavalent Chromium	ng/m ³	0.0160	0.0269	0.0971	ND	0.057	0.0384	0.0097	0.0346	0.0104	1.58	0.592	0.0839	ND	0.0147	0.105	0.0264
Cobalt (PM ₁₀)	ng/m ³	--	--	--	--	0.27	1.11	0.33	0.06	0.02	1.87	2.02	2.28	0.11	--	--	0.04
% Hours w/Wind Direction from Expected ZOI ^a	%	4.2	0.0	20.8	0.0	29.2	12.5	12.5	0.0	0.0	66.7	66.7	50.0	4.2	0.0	8.3	0.0
Wind Speed (avg. of hourly speeds)	mph	6.4	3.0	3.2	3.0	2.9	2.3	3.2	6.4	3.2	13.2	5.1	4.4	3.3	3.9	4.0	4.3
Wind Direction (avg. of unitized vector) ^b	deg.	220.1	206.7	340.5	202.6	26.2	22.3	102.1	78.7	118.2	292.9	261.9	282.2	48.7	128.7	333.6	110.8
% of Hours with Speed below 2 knots	%	0.0	54.2	20.8	25.0	25.0	66.7	33.3	8.3	16.7	0.0	0.0	20.8	12.5	16.7	0.0	29.2
Daily Average Temperature	° F	67.7	64.6	71.4	72.9	62.5	63.4	70.9	61.6	67.6	54.7	53.2	42.1	42.1	51.4	44.9	46.2
Daily Precipitation	inches	0.02	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.28	0.78	0.02	0.02	0.00	0.00	0.01	0.25

Due to instrument error, meteorological measurements were not collected at Lincoln Park Elementary School on July 30th. As such, hourly wind information was extracted from the Muskegon County Airport NWS station for this day and used as a surrogate. Additionally, there were no readings for the 01:00 and 02:00 wind speed readings on Sept. 28th at the school. As such, the corresponding wind speed data from the Muskegon County Airport NWS station on that day were used as a surrogate.

All precipitation and temperature data were from the Muskegon County Airport NWS Station.

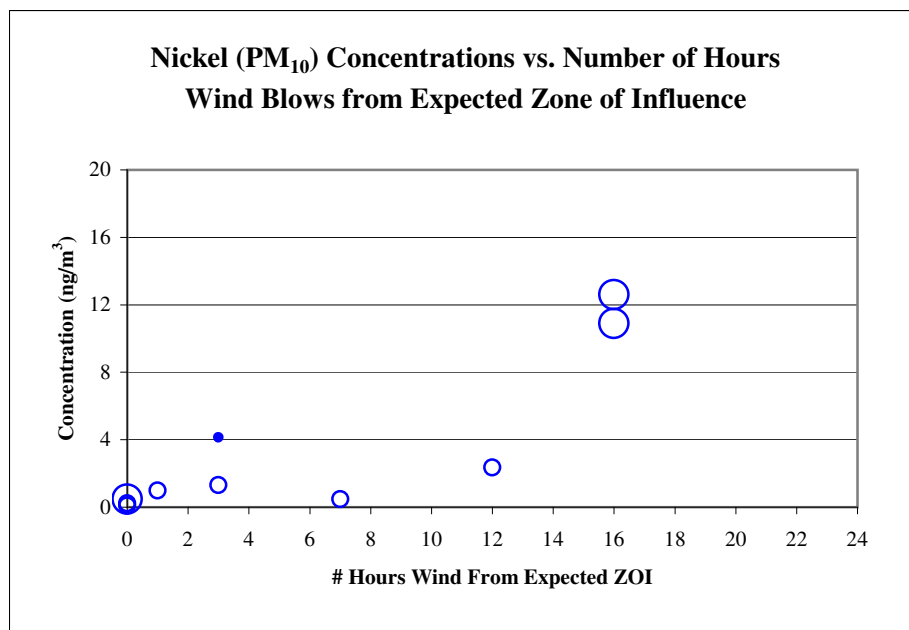
ND No detection of this chemical was registered by the laboratory analytical equipment. The method detection limit is 0.0043 ng/m³.

-- No sample was collected for this pollutant on this day or this sample was invalidated.

^a Based on count of hours for which vector wind direction is from expected zone of influence.

^b Wind direction for each day is represented by values derived by scalar averaging of hourly estimates that were produced (by wind instrumentation's logger) as unitized vectors (specified as degrees from due north).

Figure 2a. Lincoln Park Elementary School (Muskegon, MI) Nickel (PM₁₀) Concentration and Wind Information.



Pollutant: Nickel (PM₁₀)

Timeframe: August 23, 2009 - November 24, 2009

Note

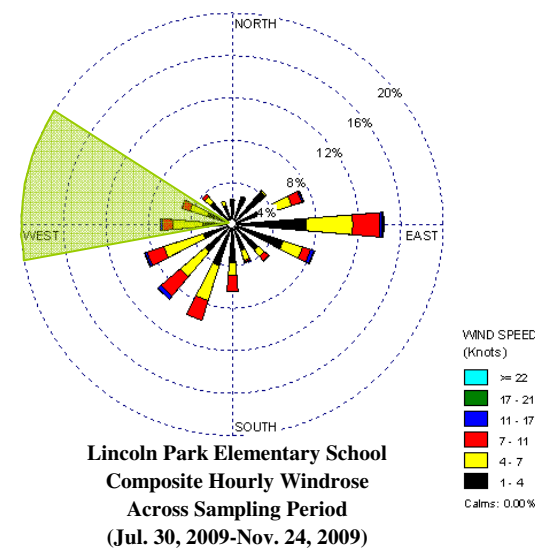
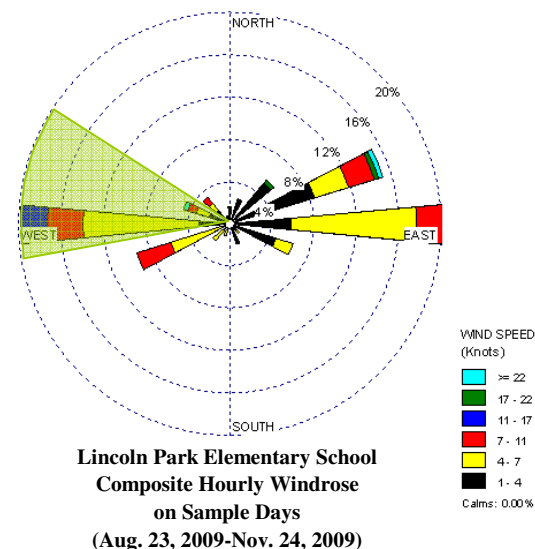
Each circle denotes a 24-hour collection of air for chemical analysis. The size of the circle indicates the magnitude of the wind speed for that day (wind data shown in Table 2). The expected zone of source influence is a rough approximation of the range of directions from which winds carrying chemicals emitted by the key source may originate.

KEY

• Wind Speed: 0.1-2.5 mph

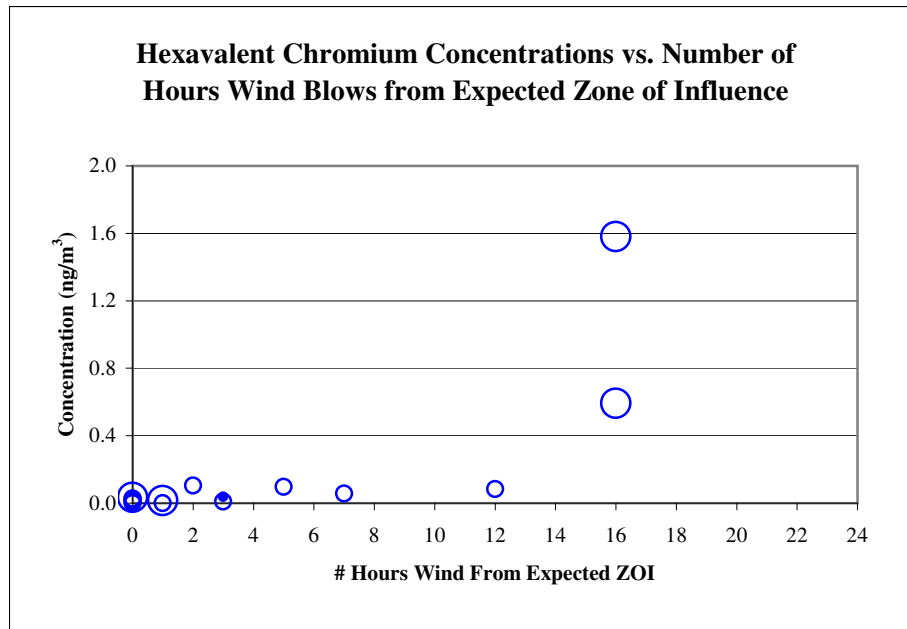
○ Wind Speed: 2.5-5.0 mph

○ Wind Speed: > 5.0 mph



Expected Zone of Source Influence

Figure 2b. Lincoln Park Elementary School (Muskegon, MI) Hexavalent Chromium Concentration and Wind Information.



Pollutant: Hexavalent Chromium

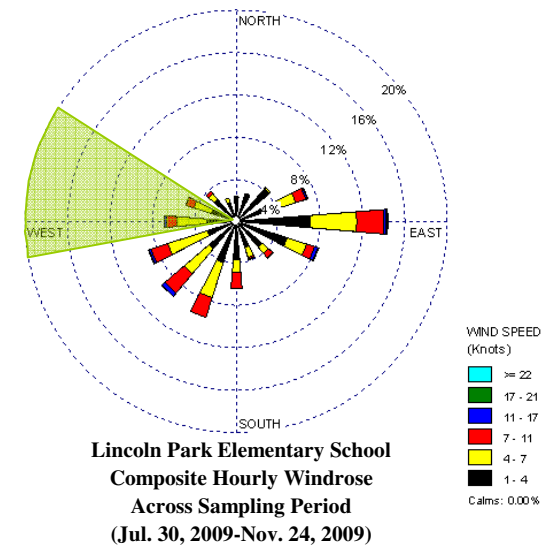
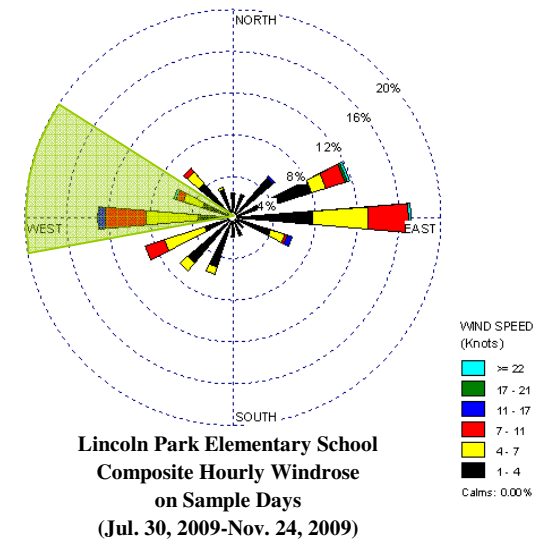
Timeframe: July 30, 2009 - November 24, 2009

Note

Each circle denotes a 24-hour collection of air for chemical analysis. The size of the circle indicates the magnitude of the wind speed for that day (wind data shown in Table 2). The expected zone of source influence is a rough approximation of the range of directions from which winds carrying chemicals emitted by the key source may originate.

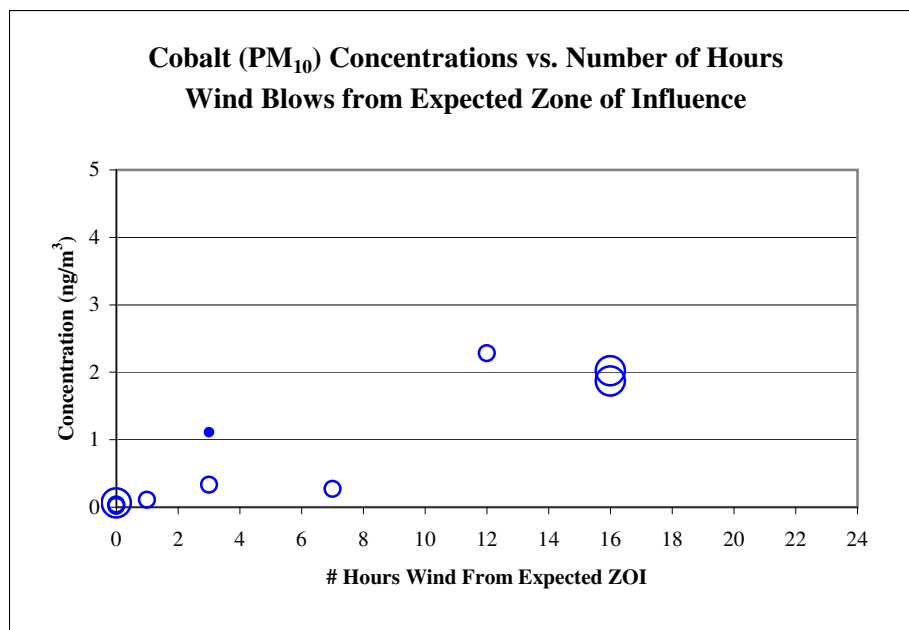
KEY

- Wind Speed: 0.1-2.5 mph
- Wind Speed: 2.5-5.0 mph
- Wind Speed: > 5.0 mph



Expected Zone of Source Influence

Figure 2c. Lincoln Park Elementary School (Muskegon, MI) Cobalt (PM_{10}) Concentration and Wind Information.



KEY

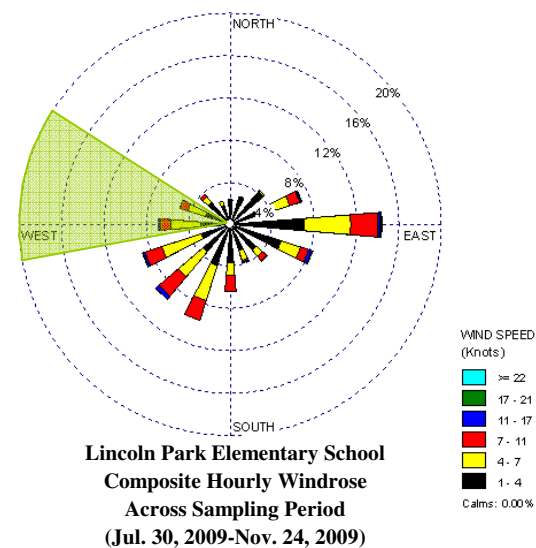
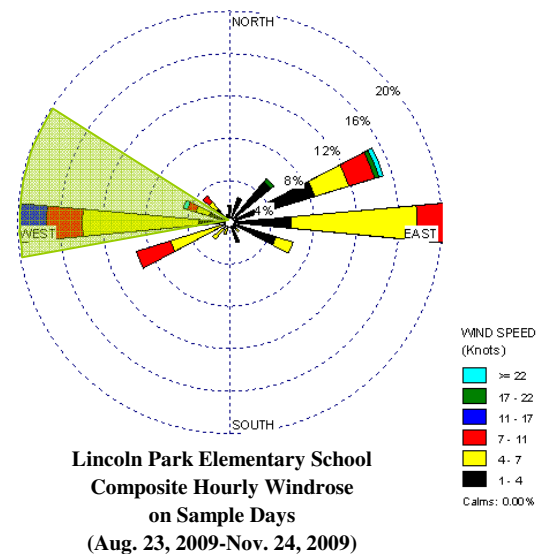
Pollutant: Cobalt (PM_{10})

Timeframe: August 23, 2009 - November 24, 2009

Note

Each circle denotes a 24-hour collection of air for chemical analysis. The size of the circle indicates the magnitude of the wind speed for that day (wind data shown in Table 2). The expected zone of source influence is a rough approximation of the range of directions from which winds carrying chemicals emitted by the key source may originate.

• Wind Speed: 0.1-2.5 mph
 ○ Wind Speed: 2.5-5.0 mph
 ○ Wind Speed: > 5.0 mph



Expected Zone of Source Influence

Appendix A. Summary Description of Long-term Comparison Levels

In addressing the primary objective identified above, to investigate through the monitoring data collected for key pollutants at the school whether levels are of a magnitude, in light of health risk-based criteria, to indicate that follow-up activities be considered, we developed two types of long-term health risk-related comparison levels. These two types of levels are summarized below.²¹

Cancer-based Comparison Levels

- For air toxics where applicable, we developed cancer risk-based comparison levels to help us consider whether the monitoring data collected at the school indicate the potential for concentrations to pose incremental cancer risk above the range that EPA generally considers acceptable in regulatory decision-making to someone exposed to those concentrations continuously (24 hours a day, 7 days a week) over an entire lifetime.²² This general range is from 1 to 100 in a million.
- Air toxics with long-term mean concentrations below one one-hundredth of this comparison level would be below a comparably developed level for 1-in-a-million risk (which is the lower bound of EPA's traditional acceptable risk range). Such pollutants, with long-term mean concentrations below the Agency's traditional acceptable risk range, are generally considered to pose negligible risk.
- Air toxics with long-term mean concentrations above the acceptable risk range would generally be a priority for follow-up activities. In this evaluation, we compare the upper 95% confidence limit on the mean concentration to the comparison level. Pollutants for which this upper limit falls above the comparison level are fully discussed in the school monitoring report and may be considered a priority for potential follow-up activities in light of the full set of information available for that site.
- Situations where the summary statistics for a pollutant are below the cancer-based comparison level but above 1% of that level are fully discussed in Appendix C.

²¹ These comparison levels are described in more detail *Schools Air Toxics Monitoring Activity (2009), Uses of Health Effects Information in Evaluating Sample Results*.

²² While no one would be exposed at a school for 24 hours a day, every day for an entire lifetime, we chose this worst-case exposure period as a simplification for the basis of the comparison level in recognition of other uncertainties in the analysis. Use of continuous lifetime exposure yields a lower, more conservative, comparison level than would use of a characterization more specific to the school population (e.g., 5 days a week, 8-10 hours a day for a limited number of years).

Noncancer-based Comparison Levels

- To consider concentrations of air toxics other than lead (for which we have a national ambient air quality standard) with regard to potential for health effects other than cancer, we derived noncancer-based comparison levels using EPA chronic reference concentrations (or similar values). A chronic reference concentration (RfC) is an estimate of a long-term continuous exposure concentration (24 hours a day, every day) without appreciable risk of adverse effect over a lifetime.²³ This differs from the cancer risk-based comparison level in that it represents a concentration without appreciable risk vs a risk-based concentration.
- In using this comparison level in this initiative, the upper end of the 95% confidence limit on the mean is compared to the comparison level. Air toxics for which this upper confidence limit is near or below the noncancer-based comparison level (i.e., those for which longer-term average concentration estimates are below a long-term health-related reference concentration) are generally of low concern and will generally be considered a low priority for follow-up activity. Pollutants for which the 95% confidence limits extend appreciably above the noncancer-based comparison level are fully discussed below and may be considered a priority for follow-up activity if indicated in light of the full set of information available for the pollutant and the site.
- For lead, we set the noncancer-based comparison level equal to the level of the recently revised national ambient air quality standard (NAAQS). It is important to note that the NAAQS for lead is a 3-month rolling average of lead in total suspended particles. Mean levels for the monitoring data collected in this initiative that indicate the potential for a 3-month average above the level of the standard will be considered a priority for consideration of follow-up actions such as siting of a NAAQS monitor in the area.

In developing or identifying these comparison levels, we have given priority to use of relevant and appropriate air standards and EPA risk assessment guidance and precedents. These levels are based upon health effects information, exposure concentrations and risk estimates developed and assessed by EPA, the U.S. Agency for Toxic Substances and Disease Registry, and the California EPA. These agencies recognize the need to account for potential differences in sensitivity or susceptibility of different groups (e.g., asthmatics) or lifestages/ages (e.g., young children or the elderly) to a particular pollutant's effects so that the resulting comparison levels are relevant for these potentially sensitive groups as well as the broader population.

²³ EPA defines the RfC as “an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. It can be derived from a NOAEL, LOAEL, or benchmark concentration, with uncertainty factors generally applied to reflect limitations of the data used. Generally used in EPA's noncancer health assessments.” http://www.epa.gov/ncea/iris/help_gloss.htm#r

Appendix B. National Air Toxics Trends Stations Measurements (2004-2008).^a

Pollutant	Units	# Samples Analyzed	% Detections	Maximum	Arithmetic Mean ^b	Geometric Mean	5th Percentile	25th Percentile	50th Percentile	75th Percentile	95th Percentile
Hexavalent Chromium	ng/m ³	4,233	66%	2.97	0.03	0.03	ND	ND	0.01	0.04	0.13
Antimony (PM ₁₀)	ng/m ³	2,372	94%	43.30	1.71	1.21	ND	0.60	1.13	2.17	4.33
Arsenic (PM ₁₀)	ng/m ³	5,076	88%	47.70	0.93	0.70	ND	0.29	0.56	1.02	2.89
Beryllium (PM ₁₀)	ng/m ³	4,771	71%	1.97	0.05	0.02	ND	ND	<0.01	0.02	0.50
Cadmium (PM ₁₀)	ng/m ³	4,793	87%	15.30	0.27	0.17	ND	0.05	0.13	0.29	0.94
Chromium (PM ₁₀)	ng/m ³	5,094	93%	172.06	2.71	1.66	ND	0.93	1.98	2.85	7.10
Cobalt (PM ₁₀)	ng/m ³	2,614	91%	20.30	0.28	0.18	ND	0.08	0.15	0.27	1.00
Manganese (PM ₁₀)	ng/m ³	4,793	99%	734.00	10.39	5.20	<0.01	2.41	4.49	9.96	33.78
Mercury (PM ₁₀)	ng/m ³	1,167	86%	2.07	0.07	0.04	ND	0.01	0.02	0.06	0.32
Nickel (PM ₁₀)	ng/m ³	4,815	92%	110.10	2.05	1.49	ND	0.74	1.44	2.50	5.74
Selenium (PM ₁₀)	ng/m ³	2,382	96%	13.00	1.10	0.53	<0.01	0.24	0.53	1.07	5.50

 Key Pollutant

ND No results of this chemical were registered by the laboratory analytical equipment.

^a The summary statistics in this table represent the range of actual daily HAP measurement values taken at NATTS sites from 2004 through 2008. These data were extracted from AQS in summer 2008 and 2009. During the time period of interest, there were 28 sites measuring VOCs, carbonyls, metals, and hexavalent chromium. We note that some sites did not sample for particular pollutant types during the initial year of the NATTS Program, which was 2004. Most of the monitoring stations in the NATTS network are located such that they are not expected to be impacted by single industrial sources. The concentrations typically measured at NATTS sites can thus provide a comparison point useful to considering whether concentrations measured at a school are likely to have been influenced by a significant nearby industrial source, or are more likely to be attributable to emissions from many small sources or to transported pollution from another area. For example, concentrations at a school above the 75th percentile may suggest that a nearby industrial source is affecting air quality at the school

^b In calculations involving non-detects (ND), a value of zero is used.

Appendix C. Analysis of Other (non-key) Air Toxics Monitored at the School and Multiple-pollutant Considerations.

At each school, monitoring has been targeted to get information on a limited set of key hazardous air pollutants (HAPs).²⁴ These pollutants are the primary focus of the monitoring activities at a school and a priority for us based on our emissions, modeling and other information. In analyzing air samples for these key pollutants, we have also obtained results for some other pollutants that are routinely included with the same test method. Our consideration of the data collected for these additional HAPs is described in the first section below. In addition to evaluating monitoring results for individual pollutants, we also considered the potential for cumulative impacts from multiple pollutants as described in the second section below (see Table C-1).

Other Air Toxics (HAPs)

- Do the monitoring data indicate elevated levels of any other air toxics or hazardous air pollutant (HAPs) that pose significant long-term health concerns?
 - Longer-term concentration estimates for the other HAPs monitored are below their long-term comparison levels.
 - Further, for pollutants with cancer-based comparison levels, longer-term concentration estimates for all but one of these (arsenic) are more than 100-fold lower.²⁵
 - Each individual measurement for all pollutants is below the individual sample screening level developed for considering potential short-term exposures for that pollutant.²⁶

Additional Information on One HAP

- The HAP mentioned above is arsenic. The mean and 95 percent upper bound on the mean arsenic (PM₁₀) concentration at the site are approximately 6-12% of the cancer-based comparison level. Additionally, a review of information available at other sites nationally shows that the mean concentration of arsenic (PM₁₀) at this site falls between the 75th and 95th percentiles of samples collected from 2004 to 2008 (the most recently compiled period) at the NATTS (Appendix B).

²⁴ Section 112(b) of the Clean Air Act identifies 189 hazardous air pollutants, three of which have subsequently been removed from this list. These pollutants are the focus of regulatory actions involving stationary sources described by CAA section 112 and are distinguished from the six pollutants for which criteria and national ambient air quality standards (NAAQS) are developed as described in section 108. One of the criteria pollutants, lead, is also represented as lead compounds on the HAP list.

²⁵ For pollutants with cancer-based comparison levels, this would indicate longer-term estimates below continuous (24 hours a day, 7 days a week) lifetime exposure concentrations associated with 10⁻⁶ excess cancer risk.

²⁶ The individual sample screening levels and their use is summarized on the website and described in detail in *Schools Air Toxics Monitoring Activity (2009), Uses of Health Effects Information in Evaluating Sample Results*.

Multiple Pollutants

As described in the main body of the report and background materials, this initiative and the associated analyses are focused on investigation of key pollutants for each school that were identified by previous analyses. This focused design does not provide for the consideration of combined impacts of pollutants or stressors other than those monitored in this project. Broader analyses and those involving other pollutants may be the focus of other EPA activities.²⁷

In our consideration of the potential for impacts from key pollutants at the monitored schools, we have also considered the potential for other monitored pollutants to be present at levels that in combination with the key pollutant levels contribute to an increased potential for cumulative impacts. This was done in cases where estimates of longer-term concentrations for any non-key HAPs are within an order of magnitude of their comparison levels even if these pollutant levels fall below the comparison levels. This analysis is summarized below.

- Do the data collected for the air toxics monitored indicate the potential for other monitored pollutants to be present at levels that in combination with the key pollutant levels indicate an increased potential for cumulative impacts of significant concern (e.g., that might warrant further investigation)?
 - The data collected for the key and other air toxics and the associated longer-term concentration estimates do not together pose significant concerns for cumulative health risk from these pollutants.
 - The only HAPs with longer-term concentration estimates more than ten percent of their lowest comparison levels are manganese and arsenic. Manganese and arsenic pose different types of risks and act on different targets in the body, reducing the potential for a cumulative impact. The comparison level for manganese is based on noncarcinogenic effects on the nervous system, while the noncancer-based comparison level for arsenic is based on effects considering several endpoints including development and the cancer-based comparison level is based on carcinogenic risk to the respiratory system. Additionally, it can be seen that in the aggregate, the longer-term concentration estimates for these pollutants comprise less than 75% of their lowest comparison levels. Taken together these considerations reduce any concerns for cumulative health risk from these pollutants.

²⁷ General information on additional air pollutants is available at <http://www.epa.gov/air/airpollutants.html>.

Table C-1. Lincoln Park Elementary School - Other Monitored Pollutant Analysis.

Parameter	Units	Mean of Measurements ^a	95% Confidence Interval on the Mean	Long-term Comparison Level ^b	
				Cancer-Based ^c	Noncancer-Based ^d
Non-Key HAPs with mean greater than 10% of the lowest comparison level					
Manganese (PM ₁₀)	ng/m ³	14.8	1.15 - 28.4	NA	50
Non-Key HAPs with mean lower than 10% of the lowest comparison level					
Arsenic (PM ₁₀)	ng/m ³	1.44	0.20 - 2.67	23	15
Cadmium (PM ₁₀)	ng/m ³	0.16	0.10 - 0.22	56	10
Antimony (PM ₁₀)	ng/m ³	0.65	0.21 - 1.10	NA	200
Selenium (PM ₁₀)	ng/m ³	0.71	0.23 - 1.18	NA	20,000
Beryllium (PM ₁₀)	ng/m ³	0.005 ^e	0 - 0.01 ^e	42	20
Mercury (PM ₁₀)	ng/m ³	0.009 ^f	0.0004 - 0.02 ^f	NA	300 ^g

ng/m³ nanograms per cubic meter

NA Not applicable

^a Mean of measurements is the average of all sample results which include actual measured values. For any samples in which the chemical was not registered by the laboratory analytical equipment, a value of zero was used in calculating the mean.

^b Details regarding these values are in the technical report, Schools Air Toxics Monitoring Activity (2009) Uses of Health Effects Information in Evaluating Sample Results.

^c Air toxics for which the upper 95% confidence limit on the mean concentration is above this level will be fully discussed in the text and may be considered a priority for potential follow-up activities, if indicated in light of the full set of information available for the site. Findings of the upper 95% confidence limit below 1% of the comparison level (i.e., where the upper 95% confidence limit is below the corresponding 1-in-1-million cancer risk based concentration) are generally considered a low priority for follow-up activity. Situations where the summary statistics for a pollutant are below this comparison level but above 1% of this level are fully discussed in the text of the report.

^d Air toxics for which the upper 95% confidence limit on the mean concentration are near or below the noncancer-based comparison level are generally of low concern and will generally be considered a low priority for follow-up activity. Pollutants for which the 95% confidence limits extend appreciably above the noncancer-based comparison level are fully discussed in the school-specific report and may be considered a priority for follow-up activity, if indicated in light of the full set of information available for the site.

^e Beryllium (PM₁₀) was detected in 5 of 10 samples, ranging from 0.002 to 0.03 ng/m³. The MDL is 0.03 ng/m³.

^f Mercury (PM₁₀) was detected in 6 of 10 samples, ranging from 0.0005 to 0.03 ng/m³. The MDL is 1.12 ng/m³.

^g The comparison level is specific to elemental mercury, which is more readily and completely absorbed into the body than mercury conveyed on particles (e.g., divalent species).

Appendix D. Lincoln Park Elementary School Pollutant Concentrations.

Parameter	Units	7/30/2009	8/5/2009	8/11/2009	8/17/2009	8/23/2009	9/4/2009	9/10/2009	9/16/2009	9/22/2009	9/28/2009	10/4/2009	10/10/2009	10/16/2009	10/28/2009	11/15/2009	11/24/2009	Sample Screening Level ^a
Nickel (PM ₁₀)	ng/m ³	--	--	--	--	0.47	4.14	1.30	0.47	0.22	10.9	12.6	2.35	0.99	--	--	0.10	200
Hexavalent Chromium	ng/m ³	0.0160	0.0269	0.0971	ND	0.057	0.0384	0.0097	0.0346	0.0104	1.58	0.592	0.0839	ND	0.0147	0.105	0.0264	580
Cobalt (PM ₁₀)	ng/m ³	--	--	--	--	0.27	1.11	0.33	0.06	0.02	1.87	2.02	2.28	0.11	--	--	0.04	100
Manganese (PM ₁₀)	ng/m ³	--	--	--	--	1.04	9.39	22.9	60.6	2.83	34.3	2.88	1.76	7.11	--	--	5.06	500
Arsenic (PM ₁₀)	ng/m ³	--	--	--	--	0.88	6.07	1.41	0.26	1.63	0.10	0.30	1.59	0.35	--	--	1.77	150
Cadmium (PM ₁₀)	ng/m ³	--	--	--	--	0.08	0.24	0.22	0.29	0.14	0.11	0.05	0.03	0.20	--	--	0.24	30
Antimony (PM ₁₀)	ng/m ³	--	--	--	--	0.20	1.38	1.35	0.56	0.75	0.07	0.14	0.14	0.15	--	--	1.77	2,000
Selenium (PM ₁₀)	ng/m ³	--	--	--	--	0.15	0.74	0.74	0.78	0.99	1.02	0.10	0.04	0.19	--	--	2.30	20,000
Beryllium (PM ₁₀)	ng/m ³	--	--	--	--	ND	0.002	0.004	0.01	0.03	ND	0.005	ND	ND	--	--	ND	20
Mercury (PM ₁₀)	ng/m ³	--	--	--	--	ND	0.0005	ND	ND	0.03	ND	0.03	0.009	0.003	--	--	0.02	3,000 ^b

Key Pollutant

ng/m³ nanograms per cubic meter

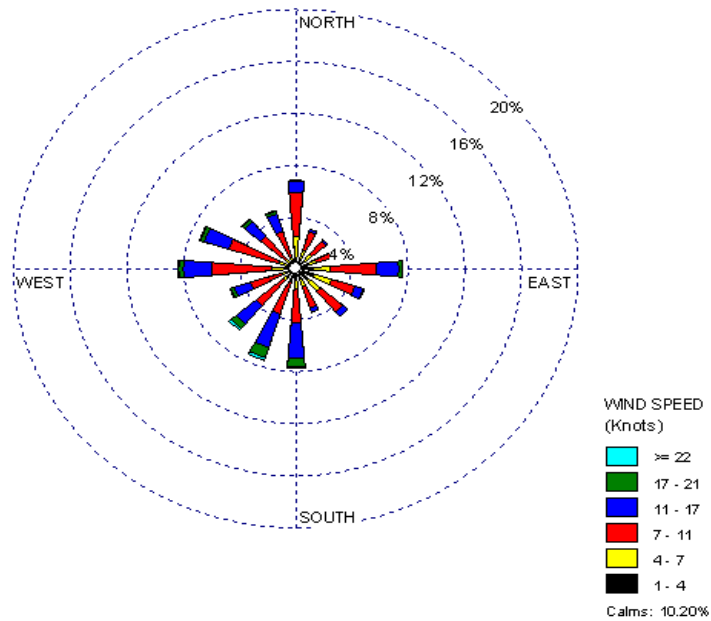
-- No sample was collected for this pollutant on this day or this sample was invalidated.

ND No detection of this chemical was registered by the laboratory analytical equipment.

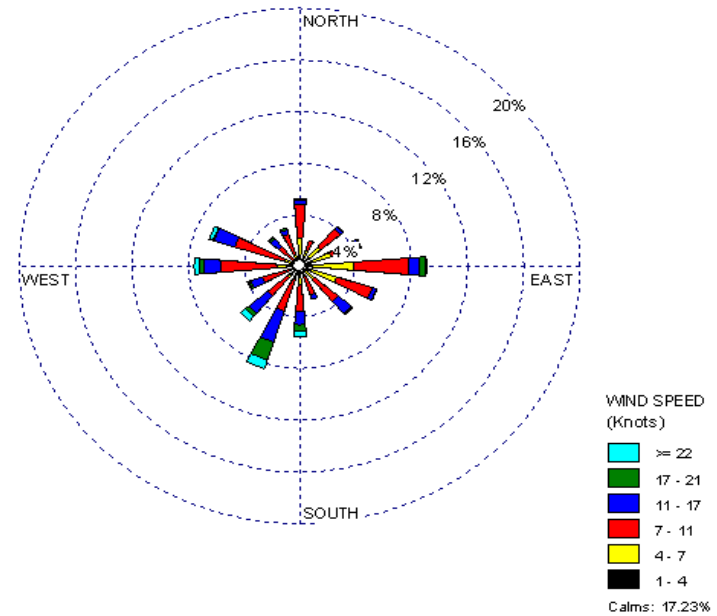
^a The individual sample screening levels and their use is summarized on the web site and described in detail in Schools Air Toxics Monitoring Activity (2009), "Uses of Health Effects Information in Evaluating Sample Results", see <http://www.epa.gov/schoolair/pdfs/UsesOfHealthEffectsInfoinEvalSampleResults.pdf>. These screening levels are based on consideration of exposure all day, every day over a period ranging up to at least a couple of weeks, and longer for some pollutants.

^b The sample screening level is specific to elemental mercury, which is more readily and completely absorbed into the body than mercury conveyed on particles (e.g., divalent species).

Appendix E. Windroses for Muskegon County Airport NWS Station.



Muskegon County Airport
NWS Station
2002-2007¹



Muskegon County Airport
NWS Station
Across Sampling Period
(Jul. 30, 2009-Nov. 24, 2009)¹

¹ Muskegon County Airport NWS Station (WBAN 14840) is 3.55 miles from Lincoln Park Elementary School.