Health Consultation

SOUTH ATLANTIC GALVANIZING (a/k/a NATIONAL GALVANIZING)

SOIL, SURFACE WATER, AND SEDIMENT SAMPLING DATA

TRAVELERS REST, GREENVILLE COUNTY, SOUTH CAROLINA

EPA FACILITY ID: SCD062640263

MAY 3, 2005

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Agency for Toxic Substances and Disease Registry
Division of Health Assessment and Consultation
Atlanta, Georgia 30333

Health Consultation: A Note of Explanation

An ATSDR health consultation is a verbal or written response from ATSDR to a specific request for information about health risks related to a specific site, a chemical release, or the presence of hazardous material. In order to prevent or mitigate exposures, a consultation may lead to specific actions, such as restricting use of or replacing water supplies; intensifying environmental sampling; restricting site access; or removing the contaminated material.

In addition, consultations may recommend additional public health actions, such as conducting health surveillance activities to evaluate exposure or trends in adverse health outcomes; conducting biological indicators of exposure studies to assess exposure; and providing health education for health care providers and community members. This concludes the health consultation process for this site, unless additional information is obtained by ATSDR which, in the Agency's opinion, indicates a need to revise or append the conclusions previously issued.

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Prepared by:

South Carolina Department of Health and Environmental Control under a cooperative agreement with the Agency for Toxic Substances and Disease Registry

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South Atlantic Galvanizing (AKA National Galvanizing) Soil, Surface Water, and Sediment Sampling Data

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BACKGROUND AND STATEMENT OF ISSUES

The Bureau of Water and the Appalachia II Environmental Quality Control District Office, both with the South Carolina Department of Health and Environmental Control (SCDHEC), asked the Office of Environmental Community Health (OECH) to evaluate the potential health risks associated with surface water, sediment, soil and groundwater monitoring data collected during investigations of the South Atlantic Galvanizing Plant. The most recent investigation and this health consultation were initiated to address concerns of a nearby property owner and area residents. A nearby private property owner is concerned about discharges to a nearby creek. Concerns have also been raised about air discharges from the facility. This health consultation will not address the air issue because there are no monitoring data. It will address the initial concerns about surface water contamination.

The facility is one-mile northwest of Travelers Rest, Greenville County, South Carolina (Figure 1). It is bordered by another facility (former Air Products) on the south, vacant land on the west, a private residence and horse farm on the east, and an unnamed creek on the north. The area beyond the creek is wooded. Access to the unnamed creek is not restricted. About a quarter of a mile downstream of the site, the creek flows through a residential neighborhood. The creek is generally less than a foot deep. There is a residential neighborhood east, beyond the horse farm. There is another creek, on the south side of the horse farm. These two creeks join, and eventually flow into the Enoree River.

There is a spring behind the facility that at one time, discharged directly into the northern creek. In 2000, the surface water interceptor system was installed. The objective of this system is to collect the spring water discharging from the sewer line backfill area before it enters the creek (Earth Tech, 2000). The collected water reaches a certain level, then it is pumped back up to the facility to a holding tank for use in the production process.

Air Products and South Atlantic Galvanizing were at one time, owned by the same person. The two properties combined are about 30 acres. The principal operation building of South Atlantic Galvanizing is on a 3-acre, fenced piece of land. There are two buildings on the property, the operations building and the office trailer. The operation building is housed in a 40-foot tall metal building constructed with a concrete floor, a metal roof, and with metal walls surrounding three sides of the building. The back of the building is open. The facility hot dip galvanizes steel products to order. There are 12 process tanks, which are six feet deep, four feet wide by 28 feet long. These tanks are five feet below the plant floor in a concrete containment pit. The tank system is double lined. The galvanizing process includes caustic cleaning, acid pickling, rinse and flux tanks, zinc application in a gas fired kettle, and final quench tanks. There is also a mechanized cooling tank. There are no point source process wastewater discharges to surface waters or the local sewer, from the facility. Spent acid from the pickling step in the galvanizing process is disposed of off-site as hazardous waste (Burgess and Niple, 1991).

At one time there was an on-site wastewater treatment plant on the property. There were also two 3-foot deep, portable outdoor swimming pools near the northeast corner of the property.

These pools were once 3/4 full of waste acid and rainwater. The United States Environmental Protection Agency (U.S. EPA) noted during its 1985 Field Investigation Team (FIT) investigation that there were also 200 to 300 drums and containers inside the building and 20 drums of rinsing pool sludge in the wastewater treatment area (Figure 2). These drums of waste, the contents of the pools, and the pools, were removed by U.S.EPA in 1985. At least one of the outdoor pools, as well as some of the drums and a tank in the building, leaked.

National Galvanizing began operations at the facility in 1981. The site was abandoned in 1983. The property was vacant between 1983 and 1986. Another company, Carolina Galvanizing, began operations at the site in 1987. In 1991, Southern States Galvanizing Corporation purchased the site and continued operations. In 1996, the property, building, and equipment at the site were transferred to Cherokee Management, L.L.C. Cherokee Management, L.L.C. leased the site to South Atlantic, L.L.C in 1997 (Earth Tech, Inc., 2002). The facility is an operating galvanizing facility.

Staff from the Bureau of Water, Bureau of Land and Waste Management, EQC District office, and OECH, visited the site, as well as the horse farm property next to the facility on October 5, 2004. Land and Waste staff also collected approximately 15 field samples during the visit. The visit was initially done at the request of the owner of the neighboring property. There was also a representative of the facility present during the visit. There are self-storage buildings on the western edge of the horse farm property, along Highway 276. The horse farm and owner=s residence is on the back part of this piece of property.

The unnamed creek, north and east of the site property, was also inspected. The creek at this point is very small, only about one to three feet wide and less than a foot deep. The creek crosses behind the facility, onto the horse farm property, and into a residential neighborhood. We also noted the sump area where spring water is collected and pumped back to the facility. The sump is equipped with an alarm system to indicate that the pump has started. This alarm system is to notify workers at the facility that the pump has started, and does not indicate any type of release into the creek.

There is a steep embankment on the northern edge of the horse farm property, bordering the facility property. This area receives storm water runoff from the parking lot of the facility. There are deep erosion channels in the surface of the embankment. There is no vegetation growing in this area. Several soil samples were collected from this area during the visit. The owner of the horse farm has dug several ditches on his property to divert run off from the facility into the creek and into a small, triangular basin. The basin was full during the time of the visit. Samples of soil were collected from the ditches, and surface water and sediment was collected from the basin. There is also a larger pond on the property, which probably does not receive any run off from the site. It is used as a water source for the owner=s horses and for fishing.

A historical summary of activities and investigations at the site are presented below. The information is presented chronologically.

- \$ November 1983. An SCDHEC sampling inspection at the facility reported that wastewater stored in the pools contained elevated levels of nickel, chromium, iron, and acids (SCDHEC, 1993).
- \$ January 1984. SCDHEC notified the owner that the facility was in violation of state hazardous waste regulations. In February 1984, an SCDHEC inspection revealed that site conditions were unchanged. U.S.EPA was notified of site conditions (SCDHEC, 1993).
- \$ April 1985. NUS Corporation completed the Site Screening Report for the U.S. EPA. Samples were collected from eight locations, four on site and four off site. Soil and water were collected from five of these locations, and soil only was collected from the other three locations. Soil samples were collected around each of the four sides of the building, from an area around one of the vats, and from a moist area underneath a closed underground pipe. Soil samples contained high levels of zinc (maximum concentration 50,000 mg/kg), lead (maximum concentration 750 mg/kg), barium (maximum concentration 190 mg/kg), and chromium (25 mg/kg) (NUS, 1985). Zinc exceeded the soil screening level for children in one sample. Lead also exceeded its screening level for residential soil (400 mg/kg) in one sample. The industrial screening level of 1,200 mg/kg was not exceeded.

Water samples were collected from the two on-site pools, and from the creeks north and south of the facility. Water from the pools contained elevated levels of zinc, iron, and lead. Creek samples collected from the creek north of the site contained 0.05 and 0.06 mg/L of zinc. Much lower levels of zinc were found in the creek south of the site (0.010 and 0.011 mg/L).

- \$ 1985. U.S.EPA conducted a removal at the facility. Contaminated materials in the pools, material that had leaked from the pools, the pools, and soil was removed from the site. U.S.EPA also removed drums and containers of stored hazardous materials. Some of these containers appeared to have leaked. There is no information to indicate that confirmatory samples were collected after the completion of the removal.
- \$ 1991. Phase I Environmental Site Assessment was completed for the sale of the property.
- \$ 1993. SCDHEC completed the Site Investigation Prioritization for the site. This report summarized activities at the site.
- \$ 1994. SCDHEC collected six surface water samples, three in the creek near the facility, one in the Enoree River, and two in the creek downstream of the facility. The maximum concentration of zinc found was 130 mg/L in a sample near the facility (SCDHEC, 1997).
- \$ 1997. SCDHEC conducted a surface water investigation. Four surface water samples were collected from the creek north of the facility. Zinc concentrations ranged from 0.01

- to 14 mg/L. The sample with the highest concentration was collected at the spring (SCDHEC, 1997).
- \$ 1998. Initial groundwater assessment. This included the installation of four monitoring wells at the facility. Samples of surface water and groundwater were collected. Zinc concentrations in groundwater ranged from 0.07 mg/L in an upgradient well to 14.2 mg/L in a well east of the site building. Surface water concentrations of zinc ranged from 0.013 mg/L upstream to 16.4 mg/L downstream of the facility. A sample of the spring contained 226 mg/L of zinc (Rust Environmental, 1998).
- \$ 1999. Report on Follow-up sampling. Samples of groundwater, surface water, and sediment were collected during this investigation. The maximum concentration of zinc in groundwater was 27 mg/L in a well between the facility and the northern creek. Surface water samples from the creek contained a maximum concentration of zinc 26.3 mg/L. The maximum concentration of zinc in sediment was 333 mg/kg in a sample collected just downstream of the spring (Figure 3, sample location 8). Zinc concentrations in the spring were very high at 1,020 mg/L (Earth Tech, 1999).
- \$ 2000. The surface water capture system was installed. The system collects the contaminated spring water and pumps it back to the facility to used in the plant=s process.
- \$ September 2000 to July 2001 Quarterly Surface Water Sampling. This sampling was completed to determine if the surface water capture system was effective at reducing the level of zinc in the creek. Zinc concentrations did not change a great deal throughout the year, but were slightly lower than concentrations before the capture system was installed. The highest concentration of zinc (20 mg/L) was found in a sample collected just downstream of the spring. This same location contained 22 mg/L in 1998 and 26.3 mg/L, before the capture system was installed (Earth Tech, November 2001). Figure 3 shows the sample locations.
- \$ 2002. Surface water and Sediment Investigation. Five co-located surface water and sediment samples were collected from the unnamed stream (north of the facility). Zinc concentrations in surface water ranged from a low of 0.02 mg/L upstream to 23 mg/L downstream. Sediment zinc concentrations ranged from 19 mg/kg at the upgradient location to 190 mg/kg, downstream of the spring.
- \$ 2002-2003. Source Area Investigation. The objective was to identify whether sources still exist at the facility that may hinder any potential corrective action. Soil samples were collected from four soil borings. Zinc concentrations ranged from 40 to 2,000 mg/kg. Groundwater was sampled from the four existing monitoring wells. Zinc concentrations ranged from 0.13 mg/L in MW 1 to 16 mg/L in MW 4 (Earth Tech, 2003).
- \$ 2003. Groundwater Assessment Phase I. Two additional monitoring wells were installed. All six groundwater-monitoring wells were sampled. Zinc concentrations

exceeded the screening level in four out of the six on site wells. Concentrations ranged from 0.07 to 390 mg/L (Earth Tech, 2003).

- \$ 2004. Groundwater Assessment Phase II. Five additional groundwater-monitoring wells were installed at the site. Zinc concentrations ranged from 0.15 mg/L in MW 1 to 760 mg/L in MW 5. MW 1 is upgradient (west) of the on-site building. MW 5 is northeast and downgradient of the facility. A temporary monitoring well located along the unnamed creek, north of the site, contained 1,400 mg/L (Earth Tech, 2004).
- \$ 2004. The facility submitted a corrective action plan for contaminated groundwater.

Screening levels for public health consultations are contaminant concentrations in specific media used to select contaminants for further evaluation. These values include U.S.EPA Maximum Contaminant Levels (MCLs), those calculated by SCDHEC, Agency For Toxic Substances and Disease Registry (ATSDR=s) Environmental Media Evaluation Guides (EMEGs), and other relevant guidelines. EMEGs are derived from ATSDR Minimal Risk Levels (MRLs). EMEGs and SCDHEC calculated screening levels are the estimates of a daily exposure to a chemical likely to be without an appreciable risk of non-carcinogenic adverse effects. MCLs are the maximum permissible levels of contaminants in public drinking water.

The MCL (5.0 milligrams per liter, mg/L) for zinc is a secondary MCL. These standards are typically developed for taste and odor issues and are not health based. The MCL for zinc is based on taste. Groundwater is not used for a public drinking water supply within four miles of the site (SCDHEC, 1993).

The ambient water quality criteria and sediment screening level for zinc are based on effects on aquatic life. The ambient water quality criterion for freshwater is 0.037 mg/L. The lowest sediment screening level is 124 milligrams per kilogram (mg/kg). It is a threshold effects level. Sediment concentrations in the creek exceeded this level.

The zinc soil screening levels are ATSDR EMEGs. The screening level for adults is 200,000 mg/kg and 20,000 mg/kg for children. Only a soil sample collected in the 1985 investigation exceeded the screening level for children.

The most recent investigation at the site was conducted by SCDHEC in October 2004. This investigation included sampling of surface water, sediment, and soil from off-site areas (Figure 4). All of these samples were analyzed for volatile organic compounds, semivolatile organic compounds, and metals. This investigation was more comprehensive than previous site investigations. Four surface (0-2 inches) soil samples were collected from the northern embankment (samples 9, 10, 11, 12 on Figure 4) on the horse farm property. This is the area that is eroded from run off from the parking lot at the facility. Three of the four samples contained high levels of zinc. The maximum concentration from this area was 2,000 mg/kg, which is below the screening level of 200,000 mg/kg for adults and 20,000 mg/kg for children.

Five co-located surface water and sediment samples were collected from the creek that flows north of the facility. Zinc concentrations ranged from 4.8 mg/L to 14 mg/L. The highest concentrations were found at sample locations five and seven (Figure 4). Concentrations were above ambient water quality criteria of 0.037 mg/L. Zinc concentrations exceeded the secondary MCL in three samples. Sediment zinc concentrations were above ecological screening levels in two locations, Sed. 4 and Sed. 8. These locations did not directly correlate with the two locations with highest levels in surface water. Zinc concentrations ranged from 4.8 mg/kg to 680 mg/kg, with the maximum concentration found at Sed. 4 (Figure 4).

None of the water samples collected from the creek south of the facility contained elevated levels of zinc. One location, Sed. 3, contained zinc above the lowest ecological screening level. This creek does not receive any direct run off from the site and joins with the northern creek downstream of the facility.

A surface water and a sediment sample were collected from the triangular basin on the horse farm property. To collect and store run off from the ditches, the property owner created this basin. The ditches were dug to divert surface water run off from the South Atlantic Galvanizing facility. The water sample contained 0.21 mg/L zinc, which is above the ambient water quality criteria, but below the secondary MCL. Sediment did not contain elevated levels of zinc.

There were no volatile organic compounds or semivolatile organic compounds found above detection limits in any of the surface water, soil, or sediment samples. There were no other metals, other than zinc, that were found in soil samples above screening levels.

DISCUSSION

The Bureau of Water and the Appalachia II Environmental Quality Control District Office, asked for an evaluation of the potential health risks associated with soil, groundwater, surface water, and sediment collected during an investigation at and near the facility. The most recent investigation and this health consultation were initiated to address concerns of a nearby property owner and area residents. A nearby private property owner is concerned about discharges to a nearby creek. Concerns have also been raised about air discharges from the facility. This health consultation will not address the air issue because there are no monitoring data and the initial concerns were raised about surface water contamination.

Many historical and recent surface water samples collected from the creek north and east of the facility, contained zinc above ecological screening levels. Historical surface water samples contained as much as 26.3 mg/L of zinc. The spring at one time contained 1,020 mg/L of zinc. These levels are far above the 0.037 mg/L ambient water quality criteria. The lowest screening levels are for effects on aquatic life. The secondary MCL (drinking water standard) and other screening levels are an order of magnitude higher than for effects on aquatic life. Sediment concentrations of zinc were also above ecological screening levels. Zinc levels in the creek could negatively impact aquatic life in the creek. Aquatic organisms are very sensitive to the

effects of zinc. There were no other chemicals found in the creek samples collected during the October 2004 sampling.

The secondary MCL for zinc is 5 mg/L for taste, and is not a health-based number. Groundwater samples on site and surface water samples collected in the creek have exceeded the secondary MCL. However, people do not drink from this creek. The amount of zinc ingested from occasionally playing in the creek would be small, and the dose would be much less than the U.S.EPA reference dose. The amount of zinc that passes directly through the skin is relatively small (ATSDR, 2003). There is no risk of adverse health effects to children or adults from playing or wading in this creek. Groundwater is not used as a public drinking water supply for several miles around the site; therefore, people will not be exposed to contaminated groundwater coming from the site.

A few soil samples have been collected during investigations of the facility. Samples were collected prior to the 1985 U.S.EPA removal, from soil borings in 2002, and during the 2004 SCDHEC sampling. Only one soil sample, collected on the site in 1985, contained zinc and lead above the screening level for children. The lead was not present above the industrial screening level of 1,500 μ g/kg. This is an operating galvanizing facility and children are not going to be on-site and therefore, will not be exposed to on-site soil. Soil sampled on a neighboring property did not contain zinc or other metals above screening levels for adults or children. Even though one area of this property seemed to be impacted by surface water runoff from the galvanizing facility, exposure to soil containing zinc is unlikely to occur. The area is private property, the runoff area is a steep embankment, and most of the area is vegetated, which all limit the potential for exposure.

Zinc is an essential element needed by your body in small amounts. We are exposed to zinc compounds in food. The average daily zinc intake through the diet in this country ranges from 5.2 to 16.2 milligrams (milligram = 0.001 gram). Food may contain levels of zinc ranging from approximately two parts of zinc per million (2 ppm) parts of foods (e.g., leafy vegetables) to 29 ppm (meats, fish, poultry). Zinc is also present in most drinking water. Drinking water or other beverages may contain high levels of zinc if they are stored in metal containers or flow through pipes that have been coated with zinc to resist rust (ATSDR, 2003).

Child Health Considerations

ATSDR recognizes that infants and children may be more sensitive than adults too environmental exposures. This sensitivity is a result of several factors: 1) Children may have greater exposures to environmental toxicants than adults because pound for pound of body weight, children drink more water, eat more food, and breathe more air than adults; 2) Children play outdoors close to the ground which increases their exposure to toxicants in dust, soil, surface water, and in the ambient air; 3) Children have a tendency to put their hands in their mouths while playing, thereby exposing them to potentially contaminated soil particles at higher rates than adults; 4) Children grow and develop rapidly, they can sustain permanent damage if toxic exposures occur during critical growth stages; and 5) Children and teenagers may disregard

ANo Trespassing@ signs and wander onto restricted locations. These factors regarding exposure to children and their sensitivity were considered in evaluating the public health implications of this site.

CONCLUSIONS

ATSDR classifies sites as to their public health hazard category. Under ATSDR=s classification system, the surface water, sediment, soils, and groundwater pose no public health hazard. This means that the levels of chemicals measured in the creeks and in the soil do not pose a risk to people who may ingest or come in contact with water and sediment in the creeks or the soil. Groundwater is not used as a public drinking water supply for several miles around the site; therefore, people will not be exposed to contaminated groundwater coming from the site.

RECOMMENDATIONS

No further public health recommendations are warranted at this time.

PUBLIC HEALTH ACTION PLAN

SCDHEC plans to inform area residents of the results of this health consultation in spring 2005.

SCDHEC Bureau of Air Quality will review the state air permit for the facility. Air monitoring may be completed at some point in the future to address the question of air discharges from the facility.

REFERENCES

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CERTIFICATION

This South Atlantic Galvanizing Health Consultation was prepared by the South Carolina Department of Health and Environmental Control under a cooperative agreement with the Agency for Toxic Substances and Disease Registry. It is in accordance with approved

methodology and procedures existing at the time the health consultation was begun. Editorial review was completed by the Cooperative Agreement Partner.

Jennifer Freed Technical Project Officer CAT, Superfund Program and Assessment Branch (SPAB) Division of Health Assessment and Consultation (DHAC) ATSDR

The Division of Health Assessment and Consultation, ATSDR, has reviewed this health consultation, and concurs with its findings.

Roberta Erlwein Team Leader, CAT, DHAC, ATSDR

Exposure and Demographic Structure File

Site Name South	Atlantic Galvanizing					
CERCLIS Number	SCD062640263					
Cost Recovery Number	er					
Government Performa		ry of the data into HazDat for use in the various reports required under the ance Review process. The data captured on this form is required for				
N	MANDATORY: The Public Health Hazard	Category for CURRENT site conditions is:				
	Urgent Public Health Hazard	because of				
	Public Health Hazard	☐ Completed Exposure Pathways				
		☐ Physical Hazard Pathways				
		☐ Potential Exposure Pathways				
1	Indeterminant Public Health Hazard	☐ Inadequate Information				
1	No Apparent Public Health Hazard					
-	X No Public Health Hazard	☐ No Completed Exposure Pathways				
		X Other				
(OPTIONAL: The Public Health Hazard Cate	gory for PAST site conditions is:				
1	Urgent Public Health Hazard	because of				
[☐ Public Health Hazard	☐ Completed Exposure Pathways				
		☐ Physical Hazard Pathways				
		☐ Potential Exposure Pathway				
	Indeterminant Public Health Hazard	☐ Inadequate Information				
1	☐ No Apparent Public Health Hazard					
	No Public Health Hazard	☐ No Completed Exposure Pathways				
		□ Other				
(OPTIONAL: The Public Health Hazard Category for FUTURE site conditions is:					
1	Urgent Public Health Hazard	because of				
1	□ Public Health Hazard	☐ Completed Exposure Pathways				
		☐ Physical Hazard Pathways				
		☐ Potential Exposure Pathways				
1	☐ Indeterminant Public Health Hazard	☐ Inadequate Information				
1	☐ No Apparent Public Health Hazard					
I	□ No Public Health Hazard	☐ No Completed Exposure Pathways				
		\square Other				

DATE: **Document Name:** CERCLIS #:

TOTAL POPULATION ESTIMATES TABLE

Pathway Types	Estimated Total Population in Exposed or Potentially Exposed Pathways*	Minimum Population*	Maximum Population*		
Potential Pathways On-site					
Potential Pathways Off-site		1			
Total Potential On and Off-site					
Completed Pathways On-site					
Completed Pathways Off-site	NA		100		
Total Completed On and Off-site					
Potential and Completed Pathways On-site	NA				
Potential and Completed Pathways Off-site	NA NA				
Total Potential and Completed On and Off-site	NA				
* The use of Greater than (>) or Less than (<) is not allowed.					

The estimated total population field is required. If you do not have an estimate, please compute the estimated using the mean of the minimum and maximum numbers. The mean is the sum of the values divided by the number of values. For this it would be: mean = (minimum + maximum)/2.

NA

Suggested Ranges for Minimum and Maximum Population Estimates:

1 - 50

51 - 500

501 - 2500

2501 - 5000

5001 - 10,000

10,001 - 50,000

50,001 - 100,000

100,001 - 250,000



Agency for Toxic Substances and Disease Registry Mailstop E-60 1600 Clifton Road, NE Atlanta, GA 30333

Date May 5, 2005

From Division of Health Assessment and Consultation, ATSDR

Subject Health Consultation

South Atlantic Galvanizing

To Bob Safay

Senior Regional Representative, ATSDR, Region IV

Enclosed please find five copies of the May 3, 2005, Health Consultation on the following site prepared by the South Carolina Department of Health and Environmental Control under Cooperative Agreement with the Agency for Toxic Substances and Disease Registry.

SOUTH ATLANTIC GALVANIZING (a/k/a NATIONAL GALVANIZING) TRAVELERS REST, GREENVILLE COUNTY, SOUTH CAROLINA EPA FACILITY ID: SCD062640263

SOIL, SURFACE WATER, AND SEDIMENT SAMPLING DATA

The Division of Health Assessment and Consultation requires copies of all letters used to transmit this document to the agencies, departments, or individuals on your distribution list. The copy letters will be placed into the administrative record for the site and serve as the official record of distribution for this health consultation.

Please address correspondence to the Division of Health Assessment and Consultation, Agency for Toxic Substances and Disease Registry, ATTN: South Atlantic Galvanizing Site, 1600 Clifton Road, NE (E60), Atlanta, Georgia 30333.

Aaron Borrelli Manager, Records Center

Enclosures

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