

Health Consultation

FORMER IMAGE OF WICKER SITE
1000 CHIN ROAD (FORMERLY VAVAGES ROAD)
BLACKWATER INDUSTRIAL PARK, DISTRICT 1
GILA RIVER INDIAN COMMUNITY
PINAL COUNTY, ARIZONA

EPA FACILITY ID: AZD982408809

**Prepared by the
Gila River Indian Community**

MAY 14, 2009

Prepared under a Cooperative Agreement with the
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Agency for Toxic Substances and Disease Registry
Division of Health Assessment and Consultation
Atlanta, Georgia 30333

Health Consultation: A Note of Explanation

A health consultation is a verbal or written response from ATSDR or ATSDR's Cooperative Agreement Partners 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 or ATSDR's Cooperative Agreement Partner which, in the Agency's opinion, indicates a need to revise or append the conclusions previously issued.

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Statement of the Issue

In response to concerns expressed by the Gila River Indian Community (GRIC) regarding what health risk the Former Image of Wicker Site may present, the Office of Occupational Safety and Health (OSH) initiated a health consultation under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR) to evaluate if exposure to Volatile Organic Compounds (VOCs) in the soil presents a health hazard. As part of this health consultation, existing environmental data was reviewed and OSH staff conducted an on-site evaluation of the Former Image of Wicker Site. A health-based interpretation of environmental data is presented in this health consultation along with conclusions and recommendations.

Background

The Former Image of Wicker Site is located at 1000 Chin Road (Formerly Vavages Road), Blackwater Industrial Park located within District 1 of the Gila River Indian Community. Blackwater Industrial Park consists primarily of closed industrial sites. However, new tribal housing development near Blackwater Industrial Park has taken place within the last five-years.¹ For example, approximately 0.5 miles south of the site are located new tribal homes in the GRIC Cholla Mountain Subdivision.

The entire subject property is reported to be approximately 4.04 acres. However, the fenced portion of the Image of Wicker site represents only 1.7 acres. The main road into the property is off Chin Road to the west (See Appendix A). Chin Road was formerly known as Vavages Road. A review of historical data for the Former Image of Wicker Site revealed a series of tenants dating back to as early as 1971.

Documentation provided by the United States Department of the Interior, Bureau of Indian Affairs, Pima Agency, shows that the first tenant to occupy the Former Image of Wicker Site was Gila River Indian Enterprises, Inc. A copy of a lease agreement pertaining to Gila River Indian Enterprises, Inc. shows a lease commencement date of 1 April 1971.² However, documents from the Pima Agency do not describe the type of production undertaken by Gila River Indian Enterprises, Inc. Nonetheless, a report by N. Weiss Associates, Inc. describes the first tenant at the site may have been a tent/awning manufacturer or an aircraft maintenance hanger.³ An onsite evaluation by OSH staff revealed metal debris, which appear to be awning fragments, north of the 1.7 acre site.

The second tenant to occupy the Former Image of Wicker Site was Wudlite, Inc. Wudlite, Inc. entered into a lease agreement with the Gila River Indian Community on 17 May 1978.⁴ Production at Wudlite, Inc. consisted of the manufacturing of outdoor wicker furniture. On 29 February 1988, the U. S. Environmental Protection Agency (EPA), Region 9, Toxics and Waste Management Division conducted a Resource Conservation and Recovery Act (RCRA) investigation at Wudlite, Inc. and cited the company for operating a hazardous waste management facility without a RCRA permit (40 CFR 270.1(c)).⁵ At the time of the investigation, EPA officials observed several open drums of polystyrene-contaminated acetone waste and Methyl Ethyl Ketone (MEK)

being stored onsite. EPA investigators also reported that representatives of Wudlite, Inc. could not provide documentation of proper disposal of hazardous waste produced by their company. Subsequent to the February 1988 EPA investigation, Wudlite, Inc. submitted a Notification of Hazardous Waste Activity to the EPA in March 1988 and was entered into an EPA RCRA database as a small quantity generator.⁶ The fate of hazardous wastes observed at Wudlite, Inc. during the February 1988 EPA investigation remains unknown. In addition, no historic information regarding closure of Wudlite, Inc. could be located.

The final tenant at the site was Image of Wicker, Inc. which signed a lease agreement with the Gila River Indian Community on 7 August 1991.⁷ Image of Wicker, Inc. continued the type of outdoor wicker furniture manufacturing that was previously undertaken by Wudlite, Inc. Due to unknown reasons, a business decision was made to submit a Closure Plan to the EPA on 3 May 1993.⁸ A final closure plan was approved by the EPA on 24 January 1994.⁹ Subsequent to the 24 January 1994 closure plan, the owners of Image of Wicker, Inc. were evicted from Blackwater Industrial Park due to delinquent rent payments.¹⁰

Manufacturing activities (if any) conducted by Image of Wicker, Inc. between 1994 and 1998 are unknown. However, on 5 March 1998, the EPA conducted an onsite investigation at Image of Wicker, Inc. to determine the company's compliance with applicable federal environmental statutes and regulations with respect to RCRA, as amended, and the federal hazardous waste regulations provided in the Code of Federal Regulations (CFR), Title 40, Parts 260 – 270, 279. During their investigation, EPA officials observed approximately 80, empty, fifty-five gallon drums being stored on native soil with no secondary containment. In addition, EPA officials also observed 150 one and five-gallon buckets of open, empty acetone and paint containers discarded on native soil with no secondary containment.¹¹

At the time of the 5 March 1998 inspection conducted by the EPA, Image of Wicker, Inc. was a Conditionally Exempt Small Quantity Generator (CESQG – 40 CFR § 261.5). Image of Wicker did not have an EPA Identification Number at the time of inspection. Moreover, EPA officials saw no evidence of active hazardous waste collection and storage during their investigation. Therefore no action was taken except to strongly recommend that Image of Wicker, Inc. hire a professional waste removal contractor to remove any and all waste and empty containers stored onsite as soon as possible.¹²

Following the EPA inspection conducted on 5 March 1998, removal of waste materials at the Former Image of Wicker Site was carried out by RECON Engineering, Inc. on 30 and 31 July 1998 under the direction the EPA, Region 9, RCRA Enforcement Section and the Gila River Indian Community, Department of Environmental Quality. It is important to note that the Arizona Department of Environmental Quality assigned an EPA Identification Number to Image of Wicker, Inc. on 28 July 1998 (AZD82408809), just prior to the 31 July 1998 removal of waste materials at the site.¹³ Only hazardous/regulated materials that could not be disposed of in a sanitary landfill were removed from the site. Copies of waste transportation and disposal manifests were

provided to the Gila River Indian Community, Department of Environmental Quality by RECON Engineering, Inc.^{14, 15}

It is believed that buildings formerly occupied by Image of Wicker, Inc. remained vacant until a fire which took place in 2002 or 2003 destroyed the main manufacturing structure.¹⁶

Discussion

Site Characteristics

In 2005, N. Weiss Associates, Inc. (NWA) conducted a Phase I Environmental Site Assessment at the Former Image of Wicker Site. The purpose of this site assessment was to document the presence or absence of any recognized environmental condition with respect to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The assessment conducted by NWA also catalogued the physical conditions of the site in 2005.

According to the NWA Phase I Environmental Assessment Report, the Image of Wicker site in 2005 consisted of a security fence surrounding a concrete foundation and rubble from a fire that burned down the main manufacturing structure in 2002 or 2003. Fire debris was observed by NWA to be located on the north and west portions of the concrete foundation. NWA also made note of an abandoned double-wide trailer situated to the northwest of the fenced property. This double-wide trailer was believed to also be part of the Image of Wicker facility.¹⁷

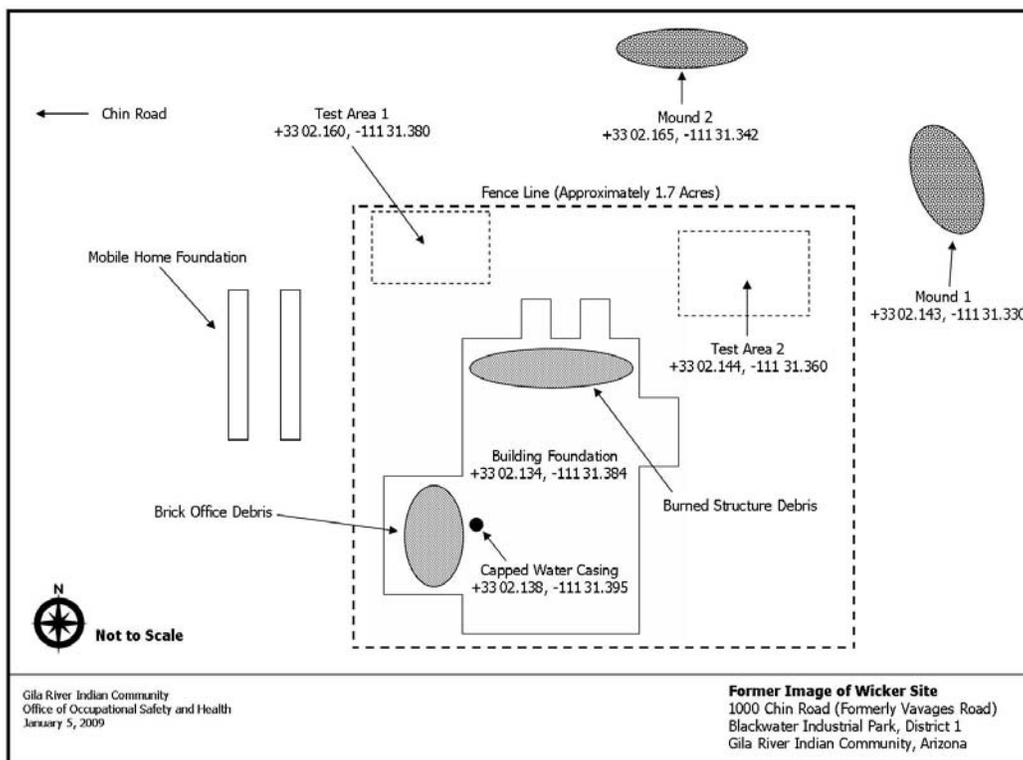
Staff from the Gila River Indian Community, Office of Occupational Safety and Health (OSH) conducted an onsite evaluation of the Former Image of Wicker Site in October 2008. While onsite, OSH staff observed minimal differences (with some exceptions) regarding observations made by NWA in 2005. The exceptions noted by OSH staff included: removal of significant portions of the security fence surrounding the site; removal of the double-wide trailer; and removal of large structural components that made up the rubble described by NWA. The site is easily accessible to the public and contains numerous physical hazards.

Site Data

In 1994, at the request of representatives from Image of Wicker, Inc., HAZTECH Enviro-Systems, Inc. was contracted to perform the Sampling Plan to certify closure of the facility in accordance to the Image of Wicker, Inc. Closure Plan approved by the EPA on 24 January 1994. According to documentation provided by HAZTECH Enviro-Systems, Inc., HAZTECH personnel entered the site property on 24 March 1994 to collect soil samples. Soil samples were collected from two test areas from within the 1.7 acre fenced property of the Image of Wicker, Inc. site (See Figure 1 - Page 8). Test Area 1 is located in the northwest corner of the site property. The location of Test Area 1 was selected based on observations made by EPA officials during the 29 February 1988 investigation

and other first-hand observations made by Gila River Indian Community hazardous materials officials. Observations made by both EPA and tribal officials indicate that drums of hazardous waste were being stored in Area 1. Area 2 (located east of the concrete foundation) was also selected as a direct result of past observations made by EPA and tribal officials regarding storage of hazardous waste. Soil samples in both test areas were taken at approximately 3 inches below the soil surface.¹⁸

Figure 1.
Location of Soil Sample Test Areas Conducted by
HAZTECH Enviro-Systems, Inc. – 24 March 1994



Soil tests for both Areas 1 and 2 were limited to contaminants of concern (target analytes). The target analytes chosen by HAZTECH Enviro-Systems, Inc. were Acetone, 2-Butanone (Methyl Ethyl Ketone (MEK)), Methylene Chloride, Toluene and 1-1-1 Trichloroethane (TCA). Of the five target analytes tested using EPA Methods 8240 and 8010/8020, only MEK was detected at 0.16 mg/kg in Test Area 2. However, EPA rejected the sampling methods chosen by HAZTECH as a basis for determining the extent of contamination at the site.^{19, 20}

A second set of soil tests were conducted by RECON Engineering, Inc. on 30 and 31 July 1998 as part of the transportation and removal of hazardous waste from the Image of Wicker site. Soil samples taken by RECON were extracted from the same test areas and sampling depth utilized by HAZTECH Enviro-Systems, Inc. on 24 March 1994. Based on the types of materials stored at the site during the removal of hazardous wastes, soil

samples were analyzed for the presence of Volatile Organic Compounds (VOCs) using EPA test method 8260. Only those chemical compounds included in EPA test method 8260 that were identified in concentrations at or above the laboratory detection limit were reported by RECON Engineering, Inc. (See Table 1).

Table 1.
Soil Sample Results by RECON Engineering, Inc. – 30, 31 July 1998

		Test Results VOCs (mg/kg)	Residential SRL (mg/kg)	Non-Residential SRL (mg/kg)
Test Area 1	Napthalene	0.05	2,600	27,000
	Styrene	4.22	3,300	3,300
Test Area 2	Benzene	0.07	0.62	1.4
	Ethylbenzene	0.16	1,500	2,700
	Isopropylbenzene	0.07	Not Listed	Not Listed
	Naphthalene	0.10	2,600	27,000
	Styrene	23.8	3,300	3,300
	Toluene	0.26	790	2,700
	Total Xylenes	0.48	2,800	2,800

Based on a comparison of the laboratory test results to Arizona Soil Remediation Levels (SRLs) in 1998, none of the chemical compounds identified exceeded residential or non-residential SRLs.²¹

Site Unknowns

There are several unknown factors with respect to the Former Image of Wicker Site. The Phase I Environmental Site Assessment Report completed by N. Weiss Associates, Inc. in 2005 concluded that a “suspect environmental condition exists on the property.” N. Weiss Associates, Inc. described in their report scattered debris (e.g., resin, tent grommets and metal fragments) and two large mounds containing rusted drum rings, pallet remnants and related debris north and east of the fenced portion of the 1.7 acres lot once used by Image of Wicker, Inc. An onsite evaluation of the site by OSH staff in October 2008 verified observations made by N. Weiss Associates, Inc. In addition, N. Weiss Associates, Inc. goes on to further conclude that the “mounded earth is suspect as a possible land disposal area.”²²

Moreover, N. Weiss Associates, Inc. also cites that the vertical extent of contamination in Test Area 1 and 2 has never been fully characterized. The levels of VOCs reported by RECON Engineering, Inc. (although well below Arizona SRLs in 1998) taken at 3 inches below the soil level were assumed to represent the worst case scenario. N. Weiss Associates, Inc. states that this assumption was never validated and that the vertical extent of contamination in Test Areas 1 and 2 should be further defined.²³

A proposed work plan to carry out a limited Phase II environmental site assessment was submitted by Bender Environmental Consulting, Inc. in 2005 to the Gila River Indian Community, Department of Environmental Quality. The work plan proposed to: 1. Characterize the vertical extent of soil contamination in Test Area 1 and 2; 2. Collect samples of dried resin and debris in and around the dirt mounds to the north and east of the 1.7 acres site; and 3. Conduct further investigation of the debris in and around the dirt mounds to the north and east of the 1.7 acres site.²⁴

As of 5 January 2009, a Phase II environmental site assessment has not been carried out at the Former Image of Wicker Site.²⁵

Exposure Pathway Evaluation

There are five elements considered in the evaluation of an exposure pathway. The five elements are: 1. A source of contamination; 2. Transportation through an environmental medium (e.g., soil); 3. A point of exposure; 4. Route of exposure; and 5. A receptor population. Exposure pathways are classified as completed, potential or eliminated. A completed pathway exist when these five elements are present and indicate that exposure to a contaminant has occurred in the past and/or is occurring. A potential pathway is one that may have occurred in the past or present, or could occur in the future. Completed and potential pathways, however, may be eliminated when they are unlikely to be significant.

A completed and potential exposure pathway exists at the Former Image of Wicker Site (See Table 2). For example, an onsite evaluation conducted by OSH staff in October 2008 revealed evidence of salvaging and recreational activities (i.e., All Terrain Vehicle (ATV) tracks) actively taking place. Moreover, the GRIC District 1 Cholla Mountain Subdivision is within a one-mile radius of the site. Because the Cholla Mountain Subdivision is within such close proximity, it is possible that it may be or has become a source of curiosity to children residing in the subdivision. In addition, access to the site is facilitated by the lack of a security fence surrounding the property.

**Table 2.
Completed and Potential Exposure Pathway
Former Image of Wicker Site**

Source	Contaminant of Concern	Environmental Media	Route of Exposure	Estimated Population	Exposure Pathway
Former Image of Wicker Site	VOCs	Soil	Dermal Contact (i.e., Salvaging, Recreational Activities, Play Area)	30—40	Completed and Potential

Health Effects Evaluation

VOCs represent the contaminant of concern at the Former Image of Wicker Site. Therefore to further evaluate human exposure to VOCs, soil test data was evaluated against health-based comparison values developed by the Agency for Toxic Substances and Disease Registry (ATSDR). The health-based comparison values selected for this evaluation are based on intermittent exposures for children and represent the most conservative comparison values available. Children are the most sensitive receptors of environmental contaminants because they are smaller than adults and often receive higher doses of chemical exposure proportional to their body weight. The conclusion that a contaminant exceeds a health-based comparison value does not mean that the contaminant will cause adverse health effects, but rather indicates the need for a more thorough contaminant-specific investigation. Environmental concentrations below a health-based value are unlikely to cause adverse health effects regardless of exposure duration.

A health effects evaluation of soil sample data from the Former Image of Wicker Site showed that test results do not exceed ATSDR health-based comparison values for children (See Table 3).

Table 3.
ATSDR Health-Based Comparison Values
VOC Soil Sample Results by RECON Engineering, Inc. – 30, 31 July 1998
Former Image of Wicker Site

		Test Results VOCs (mg/kg)	Health-Based Comparison Value (mg/kg)	Source of Health-Based Comparison Value	Does the Test Result Exceed The Health-Based Comparison Value for Children (mg/kg)?
Test Area 1	Napthalene	0.05	30,000	ATSDR EMEG-I ¹	No
	Styrene	4.22	10,000	ATSDR RMEG ²	No
Test Area 2	Benzene	0.07	200	ATSDR RMEG	No
	Ethylbenzene	0.16	30,000	ATSDR EMEG-I	No
	Isopropylbenzene	0.07	NA ³	NA	NA
	Napthalene	0.10	30,000	ATSDR EMEG-I	No
	Styrene	23.8	10,000	ATSDR RMEG	No
	Toluene	0.26	1,000	ATSDR EMEG-I	No
	Total Xylenes	0.48	20,000	ATSDR EMEG-I	No

¹ATSDR EMEG-I: Environmental Media Evaluation Guides-Intermittent Exposure

²ATSDR RMEG: Reference Dose Media Evaluation Guides

³NA: Not Available

Nonetheless, as described earlier, it is important to note again that soil sampling conducted by RECON Engineering, Inc. is problematic due to the sampling depth. In addition, these soil test data represent only a small fraction of the entire Image of Wicker Site. For example, results reported by RECON Engineering, Inc. represent only two

areas (Test Area 1 and 2), each measuring approximately 3 feet square. Only by obtaining more comprehensive soil sampling data can a full health effects evaluation be completed.

Child Health Considerations

The Office of Occupational Health and ATSDR recognizes the unique vulnerabilities of infants and children demand special emphasis in communities faced with contamination of their water, soil, air or food. Children are at greater risk than adults from certain exposures to hazardous substances because they play outdoors and have more hand-to-mouth behavior. According to information received from the GRIC District 1 Service Center, approximately 30 children live within a one-mile radius from the Former Image of Wicker Site.

Conclusions

The Gila River Indian Community, Office Occupational Safety and Health (OSH) concludes at this time that the Former Image of Wicker Site represents an **indeterminate public health hazard**. This conclusion is based on the following issues:

1. The vertical extent of contamination in Test Areas 1 and 2 has not been fully characterized. The levels of VOCs reported by RECON Engineering, Inc. (although well below Arizona SRLs in 1998) were taken at 3 inches below the soil level and were assumed to represent the worst case scenario. N. Weiss Associates, Inc. states that this assumption was never validated and that the vertical extent of contamination in Test Areas 1 and 2 should be further defined. To date, the vertical extent of possible contamination at the site has not been evaluated.
2. The area north and east of the 1.7 acres utilized by Image of Wicker, Inc. has two large mounds containing rusted drum rings, pallet remnants and related debris. The two large mounds are within the 4.04 acre property defined as the Former Image of Wicker Site. An onsite evaluation of the site by OSH staff in October 2008 verified observations made by N. Weiss Associates, Inc. in 2005 regarding the description and location of the two mounds. In addition, OSH staff observed a significant number of metal fragments, which appear to be awning debris, protruding from the soil located north of the 1.7 acre area. Moreover, N. Weiss Associates, Inc. stated in their 2005 report that the “mounded earth is suspect as a possible land disposal area” related to hazardous waste once produced at the Former Image of Wicker Site. To this date, these mounds have not been examined as recommended by N. Weiss Associates, Inc.
3. Documentation provided by the United States Department of the Interior, Bureau of Indian Affairs, Pima Agency shows the first tenant to occupy the Former Image of Wicker Site was Gila River Indian Enterprises, Inc. However, it is not clear what type of production was undertaken by Gila River Indian Enterprises, Inc.

during early 1970s. A report by N. Weiss Associates, Inc. states that the first tenant at the site may have been a tent/awning manufacturer or an aircraft maintenance hanger. The N. Weiss Associates, Inc. report also states that hazardous substances in pigments, dyes and waterproofing may have been used in the manufacturing of tents/awnings.²⁶

Recommendations

The Gila River Indian Community, Office of Occupational Safety and Health (OSH) recommends the following:

1. A limited Phase II environmental site assessment, as recommended by N. Weiss Associates, Inc. should be carried out to address unknown issues defined in the Conclusions section of this report.
2. Public access to the Former Image of Wicker Site should be limited due to the number of physical hazards found at the site.

Public Health Action Plan

The Gila River Indian Community, Office of Occupational Safety and Health (OSH) will carry out the following as part of the Public Health Action Plan for this site:

1. Notify the Gila River Indian Community regarding the results of this Health Consultation. Specifically, provide results to District 1 Service Center representatives.
2. Provide a presentation to District 1 of the Gila River Indian Community.
3. Continue monitoring the Former Image of Wicker Site.
4. Review any new data provided to the Office of Occupational Safety and Health (OSH) regarding the Former Image of Wicker Site.
5. Update this Health Consultation when a limited Phase II environmental site assessment is completed.

References

¹ Ruben Norris, Gila River Indian Community District 1 Service Center, Personal Communication. 30 January 2008.

² Pima Agency Superintendent, Letter to Gila River Indian Community, Office of Occupational Safety and Health, Ref: Tenant Records at Former Image of Wicker Site. United States Department of the Interior Bureau of Indian Affairs, Pima Agency, 17 November 2008.

³ N. Weiss Associates, Inc., Phase I Environmental Site Assessment: Former Image of Wicker Site, 1000 Vavages Road, Blackwater Industrial Park, Gila River Indian Community (N. Weiss Associates, Inc., P.O. Box 71790, Phoenix, Arizona 85050, September 2005) 3.

⁴ Pima Agency Superintendent, Letter to Gila River Indian Community, Office of Occupational Safety and Health, Ref: Tenant Records at Former Image of Wicker Site. 17 November 2000.

⁵ Richard E. Vaille, Letter to Wiki Wright, Plant Manger, Wudlite, Inc., Ref: Hazardous Waste Investigation. United States Environmental Protection Agency, Region 9, Toxics and Waste Management Division, 11 April 1988.

⁶ Karen Ladd, Environmental Priorities Initiative Preliminary Assessment Summary Report: Wudlite Wicker (Ecology and Environment, Inc., 160 Spear Street, San Francisco, California 94105, 16 December 1991) 1-7.

⁷ Pima Agency Superintendent, Letter to Gila River Indian Community, Office of Occupational Safety and Health, Ref: Tenant Records at Former Image of Wicker Site. 17 November 2000.

⁸ Rich Vaille, Letter to Mr. Loren Hock, Image of Wicker, Ref: Closure of Image of Wicker. United States Environmental Protection Agency, Region 9, Hazardous Waste Management Division, No Date.

⁹ J. Robert Tate, Letter to Mr. Clint Seiter, United States Environmental Protection Agency, Region 9, Ref: Image of Wicker. Haztech Enviro-Systems, Inc., 1603 Eastside Loop, Suite 211, Tucson, Arizona 85710, 11 August 1994.

¹⁰ United States Environmental Protection Agency, RCRA Compliance Evaluation Inspection: Image of Wicker, Inc. (United States Environmental Protection Agency, Region 9, Waste Management Division, RCRA Enforcement Section, No Date) 2 – 6.

¹¹ United States Environmental Protection Agency, RCRA Compliance Evaluation Inspection: Image of Wicker, Inc. No Date.

¹² United States Environmental Protection Agency, RCRA Compliance Evaluation Inspection: Image of Wicker, Inc. No Date.

¹³ Wilma Molitor, Letter to Robert Rehm, Engineering Consultant, Image of Wicker, Inc., Ref: RCRA EPA ID Number. Arizona Department of Environmental Quality, Technical Programs Unit M636A, 3033 N. Central Avenue, Phoenix, AZ 85012, 28 July 1998.

¹⁴ Janet Bollman, Letter to Robert Rodriguez, U. S. EPA, Region, RCRA Enforcement Section, Ref: Image of Wicker Manifests. Gila River Indian Community, Department of Environmental Quality, 27 October 1998.

¹⁵ Robert K. Rehm, Letter to Bob McCord, Ref: Final Report – Transportation and Disposal of Fiberglass Resin and Other Waste Materials from Image of Wicker Manufacturing Facility. Recon Engineering, Inc., 4350 East Camelback Road, Suite 200F, Phoenix, Arizona, 85018, 12 August 1998.

¹⁶ Janet Bollman, Gila River Indian Community, Department of Environmental Quality, Personal Communication, 9 December 2008.

¹⁷ N. Weiss Associates, Inc., Phase I Environmental Site Assessment, (September 2005) 6 -10.

¹⁸ Richard E. Vaille, Letter to Wiki Wright, Plant Manger, Wudlite, Inc., 11 April 1988.

¹⁹ N. Weiss Associates, Inc., Phase I Environmental Site Assessment, (September 2005) 12.

²⁰ HAZTECH Enviro-Systems, Inc., Sampling and Certificate of Closure Report: Image of Wicker. (Haztech Enviro-Systems, Inc., 1603 Eastside Loop, Suite 211, Tucson, Arizona 85710, 11 August 1994) 1 – 4, 10.

²¹ Robert K. Rehm, Letter to Bob McCord, Ref: Final Report – Transportation and Disposal of Fiberglass Resin and Other Waste Materials from Image of Wicker Manufacturing Facility, 12 August 1998.

²² N. Weiss Associates, Inc, Phase I Environmental Site Assessment, (September 2005) 21.

²³ N. Weiss Associates, Inc, Phase I Environmental Site Assessment, (September 2005) 21.

²⁴ N. Weiss Associates, Inc, Phase I Environmental Site Assessment, (September 2005) 28.

²⁵ Janet Bollman, Email to Manuel M. Fontes, Gila River Indian Community, Ref: Phase II Environmental Assessment at Image of Wicker. Gila River Indian Community, Department of Environmental Quality, 5 January 2009.

²⁶ N. Weiss Associates, Inc, Phase I Environmental Site Assessment, (September 2005) 3.

Preparers of Report

Manuel M. Fontes, R.S., M.A.
Environmental Health Assessor
Gila River Indian Community
Office of Occupational Safety and Health

Randall Lange, C.S.P., R.P.I.H., M.B.A.
Principle Investigator
Gila River Indian Community
Office of Occupational Safety and Health

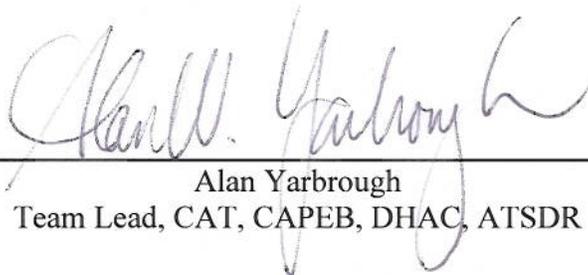
Certification

This Image of Wicker health consultation was prepared by the Gila River Indian Community under a cooperative agreement with the federal Agency for Toxic Substances and Disease Registry (ATSDR). It was completed in accordance with approved methodologies and procedures existing at the time the health consultation was initiated. Editorial review was completed by the Cooperative Agreement partner.



Charisse J. Walcott
Technical Project Officer, CAT, CAPEB, DHAC

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

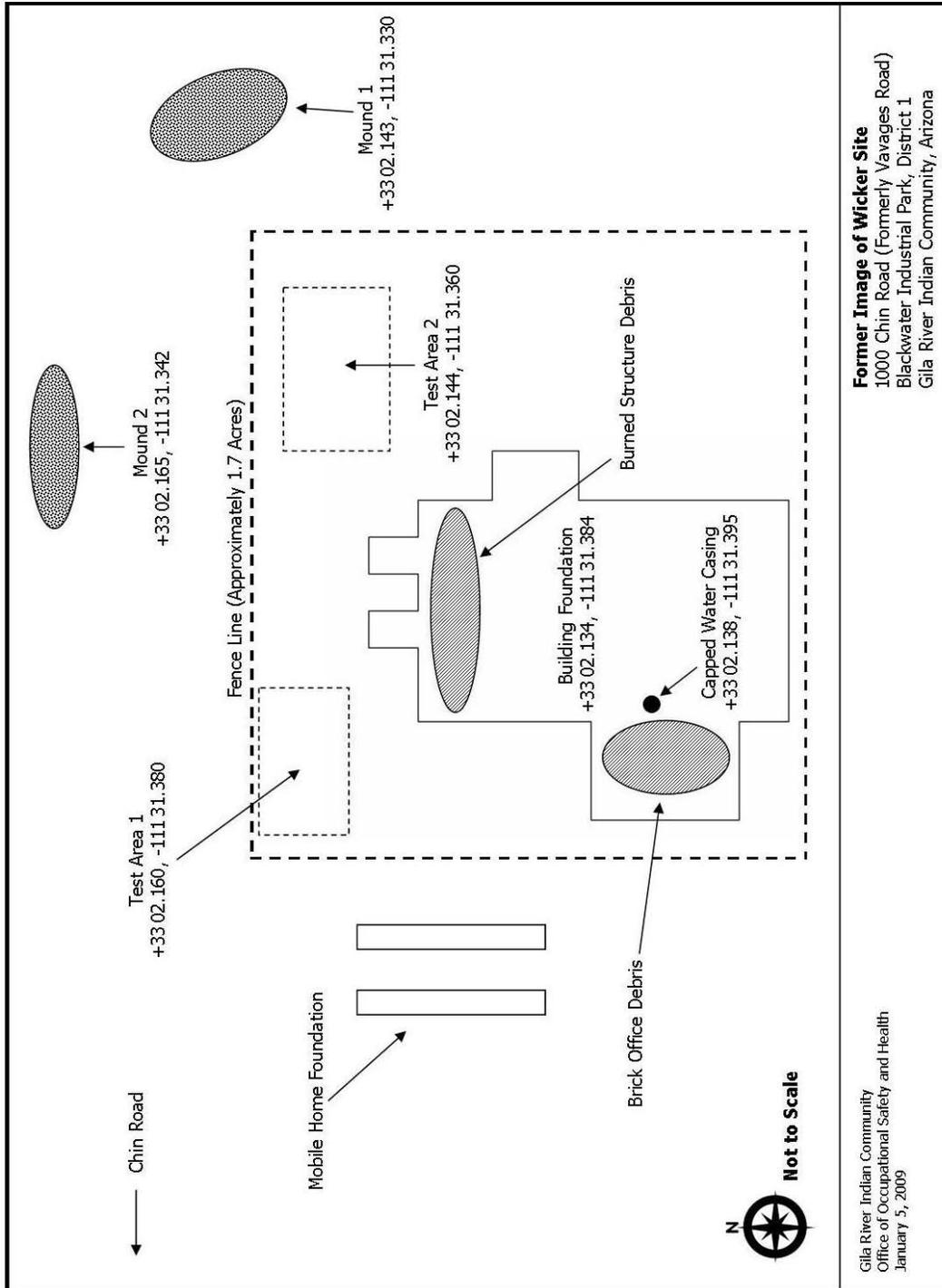


Alan Yarbrough
Team Lead, CAT, CAPEB, DHAC, ATSDR

Appendix A
Aerial Photo of Former Image of Wicker Site



Appendix B Site Map and GPS Coordinates – Former Image of Wicker Site



Former Image of Wicker Site
 1000 Chin Road (Formerly Vavages Road)
 Blackwater Industrial Park, District 1
 Gila River Indian Community, Arizona

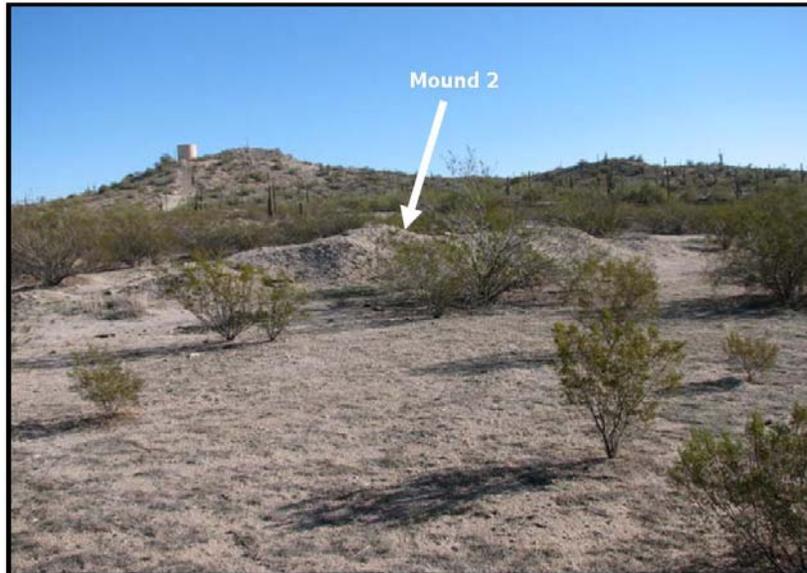
Gila River Indian Community
 Office of Occupational Safety and Health
 January 5, 2009

Appendix C Mound 1 and 2



Gila River Indian Community
Office of Occupational Safety and Health
Photo Taken: January 13, 2009

Former Image of Wicker Site
Mound 1
1000 Chin Road (Formerly Vavages Road)
Blackwater Industrial Park, District 1
Gila River Indian Community
Pinal County, Arizona



Gila River Indian Community
Office of Occupational Safety and Health
Photo Taken: January 13, 2009

Former Image of Wicker Site
Mound 2
1000 Chin Road (Formerly Vavages Road)
Blackwater Industrial Park, District 1
Gila River Indian Community
Pinal County, Arizona

Appendix D Test Area 1 and 2

