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OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

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MEMORANDUM

SUBJECT: Carbon Tetrachloride: Fenceline Technical Support – Ambient Air Pathway

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This memorandum summarizes examination of reasonably available data for the fenceline analysis for the ambient air pathway to support the risk management of carbon tetrachloride (CTC) under TSCA. The ambient air pathway was not previously evaluated in the published risk evaluation for CTC for exposures to the general population.¹ However, the draft report for the March 15–17, 2022, Science Advisory Committee on Chemicals (SACC) meeting held on the Screening Level Approach for Assessing Ambient Air and Water Exposures to Fenceline Communities Version 1.0 (*2022 Fenceline Report*) stated a fenceline analysis for the ambient air pathway would be completed for CTC. In addition, recent work presented in this memorandum considers feedback from the 2022 Fenceline SACC. Specifically, one of the SACC's recommendations was that EPA should evaluate multiple years of chemical release data to estimate exposures and associated risks to fenceline communities.

¹ <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/final-risk-evaluation-carbon-tetrachloride#documents>

The methods and results sections included in this memo highlight two approaches for evaluating exposures via inhalation and estimating associated risk to fenceline communities from CTC via the ambient air pathway. The first approach uses the methods presented during the 2022 Fenceline SACC and is referred to as the “2022 fenceline analysis.” It includes both a “pre-screening” and “full-screening” analyses and uses a single year of release data (2019) from the Toxics Release Inventory (TRI). The second approach expands upon the 2022 fenceline analysis using a modified pre-screening methodology and considers multiple years (2015 through 2020) of TRI release data. The latter approach as described herein is referred to as the “multi-year analysis.”

In summary, the overall CTC risk profile² from the multi-year analysis for both non-cancer and cancer effects is no different than the 2022 fenceline analysis—even though the multi-year analysis identified additional facilities with risk estimates above the benchmark for cancer³ which were not captured by the original data set for the 2022 fenceline analysis.⁴

1 METHODS

1.1 2022 Fenceline Analysis

The 2022 fenceline analysis for the ambient air pathway used reasonably available data and models to quantify environmental releases, evaluate exposures via inhalation, and characterize risks associated with such releases and exposures via certain air pathways previously not evaluated in the published risk evaluation for CTC. The 2022 fenceline analysis for CTC applied the methodology presented to SACC in the draft report for the 2022 fenceline analysis⁵ to evaluate exposures and associated risks to a subset of the general population defined as “fenceline communities” via the ambient air pathway. This methodology consisted of a facility-by-facility evaluation of all CTC releases reported to TRI over a single reporting year (2019).⁶ Data for this reporting year were obtained from the TRI database (TRI basic plus files downloaded circa May of 2021). Annual release data for CTC were extracted from the entire TRI data set for all facilities reporting air releases of CTC for the 2019 TRI reporting year. The draft report includes a detailed description of the fenceline methodology; however, a summary of this methodology, as applied for CTC, is provided below.

1.1.1 Ambient Air Pre-screening Methodology

The pre-screening methodology utilized EPA’s Integrated Indoor/Outdoor Air Calculator (IIOAC) model⁷ to estimate high-end and central tendency (mean) CTC concentrations in ambient air at three distances from an emitting facility (100, 100 to 1,000, and 1,000 m). EPA developed and evaluated 16

² Occupational exposure scenarios (OES) or conditions of use (COU) with risk estimates above the benchmark for cancer at the distances evaluated.

³ Although risk estimates above the benchmark for cancer are summarized in this memorandum, CTC also has risk estimates below the benchmarks for noncancer effects.

⁴ The 2022 fenceline analysis used 2019 TRI release data extracted for use in the analysis circa May of 2021. As discussed in the assumptions and uncertainties section of this memo, TRI is constantly updated and there may be facilities that did not have reported releases in the 2019 TRI dataset at the time of extraction for the 2022 fenceline analysis but have since updated releases in TRI with newly reported or revised release values that would have been captured by the latest multi-year TRI release data extracted on August 5, 2022, for use in the multi-year analysis.

⁵ <https://www.regulations.gov/docket/EPA-HQ-OPPT-2021-0415/document>

⁶ CTC generated as a byproduct was excluded from the scope of the published risk evaluation for CTC. However, for purposes of being inclusive, rather than exclusive, EPA evaluated all releases reported as CTC to the 2019 TRI. EPA does not exclude any reporting facilities from the 2022 fenceline analysis based on the production of CTC as a byproduct.

⁷ <https://www.epa.gov/tsca-screening-tools/iioac-integrated-indoor-outdoor-air-calculator>

different exposure scenarios for each of two categorical release values⁸ designed to capture a variety of release types, topography, meteorological conditions, and release scenarios. A diagram of these exposure scenarios is provided in Appendix A, Figure A-1. Findings from the pre-screening analysis informed the need for a full-screening analysis as well as provided insight into whether risk estimates above the benchmarks are or are not expected for CTC.

1.1.2 Ambient Air Full-Screening Methodology

The full-screening methodology utilized the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD)⁹ to estimate CTC concentrations in ambient air at eight finite distances (5, 10, 30, 60, 100, 2,500, 5,000, and 10,000 m) and one area distance (100 to 1,000 m) from an emitting facility. EPA modeled two different types of release estimates, as applicable, for CTC: (1) facility-specific chemical releases with source attribution when 2019 TRI data was available, and (2) alternative release estimates representing a generic facility when 2019 TRI data was not available for an occupational exposure scenario (OES). Daily and period average outputs were obtained via modeling and post-processing scripts were used to extract a variety of statistics from the modeled concentration distribution, including the 95th (high-end), 50th (central tendency), and 10th (low-end) percentile CTC concentrations at each distance modeled. Modeled air concentrations were then used to derive acute concentrations, average daily concentrations, and lifetime average daily concentrations (based on 33 years of continuous exposure over a 78-year lifetime).

Estimates of risk to fenceline communities were calculated based on the modeled exposure concentrations from the 2022 fenceline analysis and the acute and chronic hazard values for continuous inhalation exposure presented in the published risk evaluation for CTC and in Table 1-1. Risk estimates are interpreted in relation to the benchmark values corresponding to each hazard value.¹⁰ For example, cancer risk estimates represent the incremental increase in probability of an individual in an exposed population developing cancer over a lifetime (excess lifetime cancer risk) following exposure to the chemical. Cancer risk estimates greater than the benchmark values are flagged. Standard cancer benchmarks used by EPA and other regulatory agencies are an increased cancer risk above benchmarks ranging from 1 in 1,000,000 to 1 in 10,000 (*i.e.*, 1×10^{-06} to 1×10^{-04}) depending on the subpopulation exposed. In the 2022 fenceline analysis and this multi-year analysis, EPA uses 1×10^{-06} as the benchmark for the cancer risk to individuals in the general population (*e.g.*, fenceline communities).¹¹ The 1×10^{-06} value is not a bright line and EPA has discretion to make risk determinations for the chemical substance based on other benchmarks and information as appropriate.

⁸ The “pre-screening” methodology from the 2022 fenceline analysis evaluated two categorical release values across all facilities reporting releases to the 2019 TRI. The first value is the maximum single facility release reported across all facilities reporting. The second value is the mean (arithmetic average) of all releases reported across all facilities reporting.

⁹ <https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod>

¹⁰ When considering acute and chronic non-cancer effects risk estimates less than the associated benchmarks are flagged. When considering excess lifetime cancer risk, risk estimates greater than the associated benchmark are flagged.

¹¹ General Population (Gen. Pop) refers to the total of individuals inhabiting an area or making up a whole group (as defined in the [2011 Exposure Factors Handbook](#)). For purposes of the 2022 Fenceline Analysis and the Multi-Year Analysis presented herein, the general population includes, but is not limited to, residents living near a releasing facility and individuals employed at facilities which are not the releasing facility but are within the distances where calculated risk estimates are greater than the benchmark for cancer (or less than the benchmark for non-cancer).

Table 1-1. Inhalation Hazard Values Used in Risk Estimation for CTC (Fenceline and Multi-Year Analyses)

Scenario	Endpoint	Inhalation Hazard Value (Exposure Durations)	Benchmark
Acute	Temporary central nervous system effects	37.3 ppm ^a (24 hr/day)	10
Chronic	Liver: Fatty liver changes	2.27 ppm ^b (24 hr/day over 365 day/yr)	30
Chronic	Cancer (Threshold): Liver tumors	1 ppm (24 hr/day over 365 day/yr)	300
Cancer	Adrenal pheochromocytomas	4.00E-2 per ppm (24 hr/day over 365 day/yr for 33 years)	1E-6 (Gen. Pop.)

^a The acute HEC was adjusted to reflect continuous (24 hr/day) general population exposures and is therefore different from the HEC used to evaluate acute non-cancer risks from occupational exposures (8 hr/day) in the final risk evaluation. The acute HEC was derived using the equation from (ten Berge et al., 1986), $C_n \times T = K$ (where C is the exposure concentration, T is the exposure duration, K is a constant, and n is an empirical value based on rat lethality data as described in the reference), based on the original study conditions of a 4-hr exposure. This equation was used to derive a 24-hr HEC, although there is significant uncertainty associated with extrapolation to a significantly longer duration. It is unknown whether this uncertainty might result in an overestimation or underestimation of toxicity.

^b The chronic liver HEC was derived in the risk evaluation through a PBPK model on a continuous exposure basis (and was subsequently adjusted in the risk evaluation for 8-hr occupational scenarios), so no adjustment was required from the originally derived inhalation values.

1.1.3 Ambient Air Land Use Methodology

The land use methodology utilized geographic information systems (ESRI ArcGIS Version 10.8 and Google Maps) to characterize land use patterns within the radial distances where risk estimates are above the benchmark for cancer. This review did not include generic facilities. For facilities where residential areas, industrial/commercial businesses, or other public spaces are present within those radial distances where risk estimates are above the benchmark, EPA includes those receptors within the fenceline community category and reasonably expects an exposure will occur to fenceline communities. Where the radial distances with risk estimates above the benchmark occur within the boundaries of the facility or are limited to uninhabited areas, EPA does not expect an exposure will occur to fenceline communities.

1.2 Multi-Year Analysis

The multi-year analysis incorporates SACC recommendations by evaluating multiple years of chemical release data to estimate exposures and associated risks to fenceline communities. This is achieved by expanding upon the pre-screening methodology utilized for the 2022 fenceline analysis and conducting a facility-by-facility evaluation of all CTC releases reported to TRI over six reporting years (2015 through 2020). Data for these 6 years were obtained from the TRI database (TRI basic plus files downloaded on August 5, 2022). Annual release data for CTC were extracted from the entire TRI data set for all facilities reporting air releases of CTC for one or more years between 2015 and 2020. Facilities were categorized into occupational exposure scenarios for modeling purposes and later cross-walked to conditions of use (COUs) for risk management purposes. As noted in footnote 6 of this memorandum,

EPA evaluated all facility CTC releases reported to TRI between 2015 and 2020 for the multi-year analysis and did not exclude facilities based on the production of CTC as a byproduct.

The TRI data extracted for the multi-year analysis were used as direct inputs to the IIOAC model. An additional arithmetic average of the TRI data for each facility was also calculated when the facility reported releases to TRI for two or more of the years evaluated and used as a direct input to the IIOAC model. EPA then evaluated the most “conservative exposure scenario” of the 16 scenarios evaluated for the pre-screening methodology in the 2022 fenceline analysis. This most conservative exposure scenario consists of a facility that operates year-round (365 days per year, 24 hours per day, 7 days per week), a South Coastal meteorologic region, and a rural topography setting.

A land-use analysis was conducted for the multi-year analysis utilizing the same visual methodology described for the 2022 fenceline analysis but limited to land-use around facilities where the multi-year analysis (1) found risk estimates above the benchmark value extending farther out when compared to the 2022 fenceline analysis,¹² or (2) identified a new facility with risk estimates above the benchmark that was not captured by the 2022 fenceline analysis¹³. Using this methodology, EPA identified if there is an expected exposure of an individual to releases from the facility of interest within the distances where the benchmark was exceeded.

2 Results

EPA conducted and completed three analyses of CTC since the draft report for the 2022 fenceline analysis was originally presented to and reviewed by the SACC in March 2022. The three analyses are

1. Pre-screening analysis in accordance with the methodology in the draft report for the 2022 fenceline analysis;
2. Full-screening analysis in accordance with the methodology in the draft report for the 2022 fenceline analysis; and
3. Multi-year analysis in accordance with the methodology described in this technical support memorandum.

2.1 2022 Fenceline Analysis

The draft report for the 2022 fenceline analysis presented to the SACC did not include results for CTC. Therefore, EPA presents a summary of the results for both pre-screening and full-screening analyses for CTC below as well as a summary of the findings from the land use analysis for the 2022 fenceline analysis.

2.1.1 Ambient Air Pre-screening Results for CTC

The results from the pre-screening methodology used for the 2022 fenceline analysis of CTC found risk estimates that exceeded the benchmark for cancer at 100 m based on the maximum single-facility CTC release reported in the 2019 TRI. In accordance with the 2022 fenceline methodology as presented to the

¹² For example, a facility with risk estimates above the benchmark for cancer from 5 to 30 m based on the 2022 fenceline analysis (using 2019 TRI release data) and that same facility with risk estimates above the benchmark for cancer at 100 m based on the multi-year analysis (using releases reported to 2016 TRI that were higher than releases reported to 2019 TRI). In this situation, the land use analysis would extend out to include any land use between 30 and 100 m because the multi-year analysis had risk estimates above the benchmark for cancer that extended out to a farther distance when compared to the 2022 fenceline analysis.

¹³ For example, a facility that did not have reported releases in the 2019 TRI data set used for the 2022 fenceline analysis at the time of extraction but did report releases in the 2015, 2016, and 2018 TRI data sets that result in risk estimates above the benchmark for cancer based on the multi-year analysis.

SACC, because risk estimates exceeded the benchmark for cancer based on the pre-screening analysis, EPA conducted a full-screening analysis of all releasing facilities for CTC.

2.1.2 Ambient Air Full-Screening Results for CTC

The results from the full-screening methodology used for the 2022 fenceline analysis of CTC included 47 real or generic facilities. Risk estimates exceeded the benchmark for cancer risk for 31 of the 47 real or generic facilities at multiple distances, representing five OES.¹⁴ One OES (additive) had one generic facility evaluated and showing risk, but no land use analysis could be performed. The remaining four OES included real facilities for which a land use analysis was conducted as described below and summarized in Table 2-1. A summary of the maximum risk estimates for cancer, organized by OES, for CTC based on the high-end (95th percentile) exposure concentrations are included in Appendix B, Table_Apx B-1.

2.1.3 Ambient Air Land Use Results for CTC

The land use analysis for the 2022 fenceline analysis of CTC was applied to 30 real facilities with risk estimates above the benchmark for cancer at one or more distances. Twenty-one of the 30 facilities also had an expected exposure to fenceline communities (results summarized in Table 2-1). For example, the first OES identified in Table 2-1 is Industrial Processing Agent/Aid. A total of five facilities identified for this OES were evaluated for the 2022 fenceline analysis. Of those five facilities, five had risk estimates above the benchmark for cancer at one or more distances between 5 and 1,000 m from the respective releasing facility. Of those five facilities, five have fenceline receptors within the distances where risk estimates were above the benchmark for cancer. These receptors might include individuals residing in a home or apartment complex or individuals working at another industrial/commercial facility located beyond the property line of the releasing facility, but within the distances where risk estimates are above the benchmark for cancer. Facilities that do not have fenceline receptors, such as those facilities surrounded by an open field or when distances where risk estimates are above the benchmark for cancer remain within the property line of the releasing facility, would not be included in the last column of Table 2-1.

Table 2-1. Land Use Analysis Results for 2022 Fenceline Analysis of CTC

OES	Distances (m) with Risk Estimates above the Benchmark for Cancer and Fenceline Exposure	Number of Real Facilities		
		Evaluated ^a	With Risk Estimates above the Benchmark for Cancer ^b	With Risk Estimates above the Benchmark for Cancer and Fenceline Exposure ^c
Industrial Processing Agent/Aid	5 to 1,000	5	5	5
Manufacturing	5 to 2,500	21	16	12
Processing as a Reactant or Intermediate	5 to 1,000	4	4	4
Recycling and Disposal	5 to 30 and 100	13	5	0

¹⁴ Clarification: The 2022 fenceline analysis organizes facilities (and associated risks) by OES and identified 5 OES for which there were risk estimates above the benchmark for cancer. These 5 OES can be associated with one or more COUs as shown in the published risk evaluation for CTC. The multi-year analysis attempts to associate each facility with the COU category included in the published risk evaluation but does not break down COUs to the sub-category level.

OES	Distances (m) with Risk Estimates above the Benchmark for Cancer and Fenceline Exposure	Number of Real Facilities		
		Evaluated ^a	With Risk Estimates above the Benchmark for Cancer ^b	With Risk Estimates above the Benchmark for Cancer and Fenceline Exposure ^c
^a Total number of facilities evaluated in the 2022 fenceline analysis and falling within the listed OES. ^b Total number of facilities identified with risk estimates above the benchmark for cancer at some distance from the releasing facility in the 2022 fenceline analysis. ^c Total number of facilities with one or more fenceline receptors within the distances evaluated where risk estimates exceed the benchmark for cancer.				

2.2 Multi-Year Analysis

2.2.1 Ambient Air Multi-Year Results for CTC

The multi-year analysis only looks at real facilities with reported releases in TRI for one or more reporting years between 2015 and 2020 and does not include estimated releases from generic facilities. The model utilized for the multi-year analysis is the same model used in the pre-screening methodology presented to SACC (IIOAC) and is limited to evaluation of three distances (100, 100 to 1,000, and 1,000 m) from a releasing facility and therefore does not capture exposures occurring less than 100 m or greater than 1,000 m from the releasing facility.

As such, the multi-year analysis includes 60 real facilities and found risk estimates above the benchmark for cancer for 25 of those real facilities, at 100 m from the releasing facility. Based on the multi-year analysis, 4 of these 25 facilities either had risk estimates above the benchmark for cancer at distances farther out when compared to the 2022 fenceline analysis or are new facilities which were not captured in the 2022 fenceline analysis data set. Detailed results of this multi-year analysis are included in Appendix C, Table_Apx C-1.

2.2.2 Ambient Air Multi-Year Land Use Results for CTC

A follow-up land use analysis was conducted for the four facilities either indicating risks at distances farther out when compared to the 2022 fenceline analysis or new facilities not captured by the 2022 fenceline analysis. The results found one of these facilities had an expected exposure to fenceline communities. Results of this land use analysis are summarized below in Table 2-2.

Table 2-2. Land Use Analysis Results for Multi-Year Analysis of CTC at 100 m

OES	COU	Facility TRI-FID	Risk Estimates above the Benchmark for Cancer and Exposure to Fenceline Communities
Manufacturing	Domestic Manufacturing-Byproduct	70764LLMNXHWY40	Y
Recycling and Disposal	Disposal	29448GNTCMPOBOX	N
Processing as a Reactant or Intermediate	Processing as a reactant (Raw Materials)	29045HRDWC2114L	N
		53085LDRCH6100H	N

3 Closing Remarks

The combined approaches used in the analyses presented in this technical support memo are consistent with work presented to and feedback received from the SACC. For purposes of inclusivity, EPA does not exclude CTC releases that may result from production as a byproduct from either the 2022 fenceline analysis or the multi-year analysis—even though CTC generated as a byproduct was excluded from the scope of the published risk evaluation for CTC.

The multi-year analysis highlights the year-to-year variability that exists in the release data and illustrates the potential impact of considering multiple years of TRI data on exposure and risk estimates. The findings from this analysis provide additional confidence in the findings from the 2022 fenceline analysis for purposes of estimating exposures and risks to fenceline communities. The multi-year analysis did not change the overall CTC risk profile when compared to results of the 2022 fenceline analysis, although the multi-year analysis did identify additional facilities with risk estimates above the benchmark for cancer that were not captured by the 2022 fenceline analysis data set.

The multi-year analysis is intended to be a first-tier analysis designed to expand upon the pre-screening methodology presented to the SACC by considering multiple years of TRI release data and the effects of such data on the overall exposure estimates and risk calculations evaluated for the 2022 fenceline analysis. As such the results are not comprehensive.

There are also some limitations and uncertainties associated with the multi-year analysis, including potential year-to-year revisions to reported releases within the TRI database and the number of individual facilities reporting to the TRI. These limitations and uncertainties may result in changes to the

- facilities mapped to any OES;
- total volume of releases per OES;
- distribution and volume of releases to stack and fugitive emissions; and/or
- universe of OES’s previously mapped and captured

These changes may subsequently result in changes to the release and exposure assessments as well as associated risk estimates.

Further, certain assumptions and uncertainties related to the model used for the multi-year analysis can impact conclusions and limit direct comparison to the 2022 fence line analysis including, but not limited to, the following:

- use of default meteorological data incorporated into the IIOAC model which may differ from the meteorological data used for the 2022 fence line analysis;
- emission scenario used for the multi-year analysis may not represent the actual operating conditions or location used in the 2022 fence line analysis; and
- Default stack parameters used for the multi-year analysis may not represent actual stack parameters or conditions of the modeled facility.

The multi-year analysis applied the same modeling parameters across all years of facility-specific release data. Although broad comparisons may be made regarding the impact of multi-year releases on exposure concentrations and associated risk estimates, a direct comparison between the 2022 fence line analysis and the multi-year analysis results is marginal at best because certain components and assumptions used for either analysis can impact the overall estimated exposure concentrations and associated risk estimates.

Appendix A Pre-screening Exposure Scenarios for 2022 Fenceline Analysis

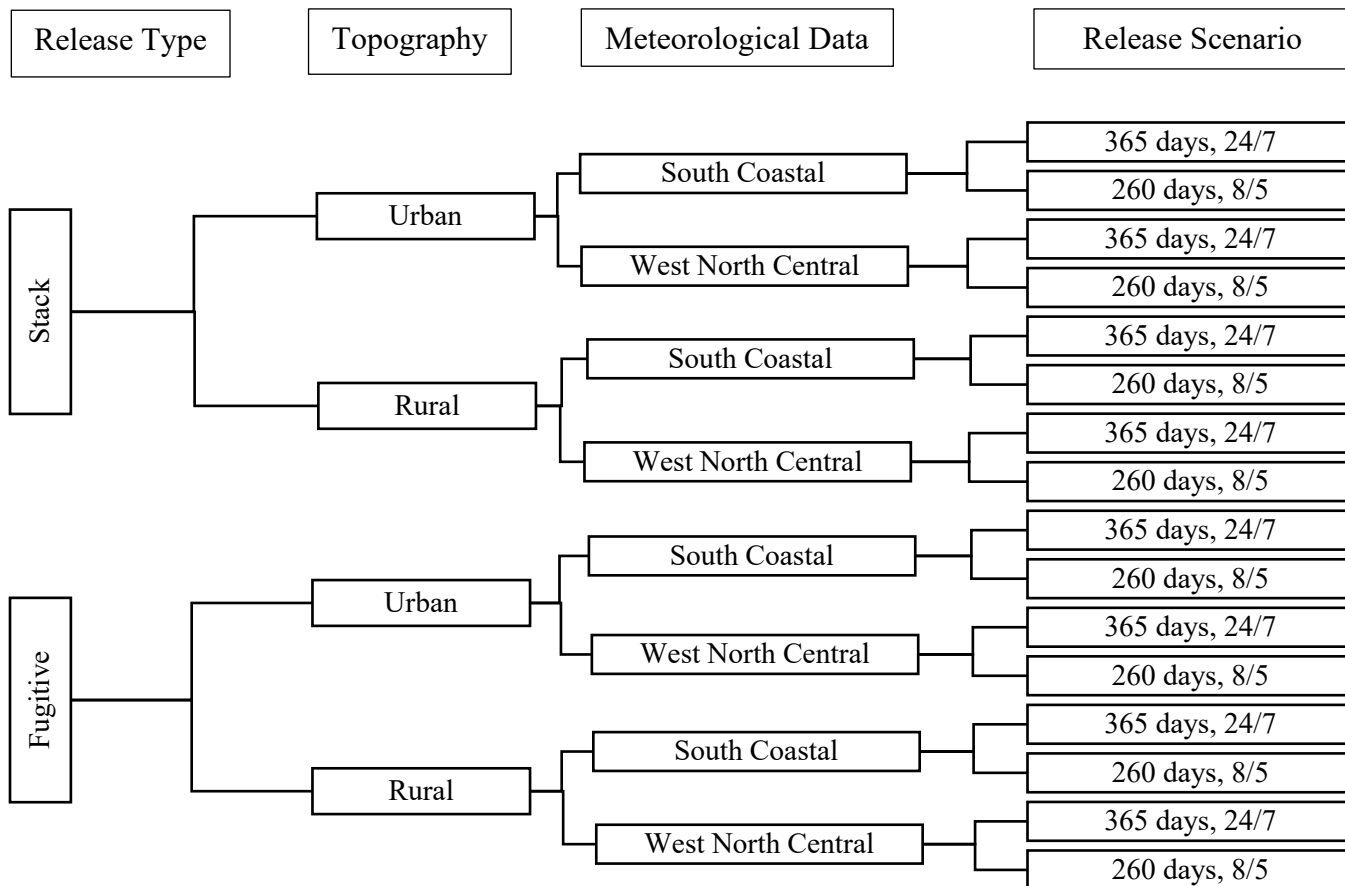


Figure A-1. Pre-screening Exposure Scenarios Modeled Using IIOAC Model for CTC: Maximum and Mean Releases

Appendix B Results Summary for 2022 Fenceline Analysis

Table_Apx B-1. Risk Estimates for Cancer for CTC Based on the High-End Exposure Concentrations for 2022 Fenceline Analysis

OES	Number of Real or Generic Facilities		Maximum Extra Risk Estimate for Cancer Across Facilities Within OES by Distance (m) (Based on 95th Percentile LADC)								
	Evaluated	With Risk Estimates Greater than Benchmark	5	10	30	60	100	100 to 1,000	2,500	5,000	10,000
Additive	1	1	1.63E-05	1.71E-05	5.76E-06	2.98E-06	1.63E-06	2.93E-07	1.78E-08	5.88E-09	1.93E-09
Industrial Processing Agent/Aid	5	5	9.68E-04	1.61E-03	7.36E-04	3.13E-04	1.53E-04	1.32E-05	1.00E-06	3.60E-07	1.28E-07
Laboratory Chemicals	1	0	8.96E-08	1.07E-07	4.00E-08	3.01E-08	3.49E-08	9.00E-09	1.65E-09	8.44E-10	3.35E-10
Manufacturing	21	16	3.40E-04	6.40E-04	3.06E-04	1.30E-04	6.48E-05	6.00E-06	1.00E-06	4.84E-07	1.96E-07
Processing as a Reactant or Intermediate	4	4	4.84E-04	8.20E-04	4.36E-04	1.81E-04	8.60E-05	8.16E-06	4.28E-07	1.37E-07	4.44E-08
Reactive Ion Etching	2	0	6.48E-13	7.80E-12	3.38E-10	3.49E-09	5.96E-09	2.03E-09	2.52E-10	1.06E-10	5.40E-11
Recycling and Disposal	13	5	1.84E-06	3.38E-06	1.60E-06	7.96E-07	1.06E-06	2.88E-07	2.98E-08	1.07E-08	3.71E-09
Total	47	31									

Appendix C Results Summary Comparison for 2022 Fenceline Analysis and Multi-Year Analysis at 100 m from Releasing Facility

Table_Apx C-1. Risk Estimates for Cancer at 100 m from Releasing Facility for CTC Based on Estimated High-End and Central Tendency Exposure Concentrations

OES	COU	Facility TRI-FID	Statistic	2022 Fenceline Analysis		Multi-Year Analysis						
				Distance with Risk Estimates above Benchmark	Risk Estimate @ 100 m	2015	2016	2017	2018	2019	2020	Arithmetic Average
Industrial Processing Agent/Aid	Industrial/ Commercial Use as an Aid in the Manufacture of Petrochemicals Derived Products and Agricultural Products	44622DVRC HWESTF	CT	5 to 1,000	1.5E-04	8.9E-06	6.1E-05	3.0E-05	4.2E-05	6.4E-05	2.2E-04	7.0E-05
			HE	5 to 1,000	4.8E-05	9.7E-06	6.8E-05	3.4E-05	4.6E-05	6.9E-05	2.4E-04	7.7E-05
		49512TSTY L5050K	CT	N/A	N/A						5.8E-09	5.8E-09
			HE	N/A	N/A						6.4E-09	6.4E-09
		5318WGCW ST1245C	CT	N/A	N/A					3.5E-08	1.7E-07	1.0E-07
			HE	N/A	N/A					3.8E-08	1.9E-07	1.1E-07
		7751WNSL GM15916	CT	N/A	N/A						0.0E+00	0.0E+00
			HE	N/A	N/A						0.0E+00	0.0E+00
		77520MBY CR8500W	CT	5 to 100	3.7E-06		9.3E-08	9.3E-08	2.7E-06	2.7E-06	2.7E-06	1.7E-06
			HE	5 to 100	1.6E-06		1.0E-07	1.0E-07	2.9E-06	2.9E-06	2.9E-06	1.8E-06
		77541THD WCBUILD	CT	5 to 100	2.2E-06	1.9E-05	3.4E-05	5.1E-05	4.4E-05	1.2E-06	3.1E-07	2.5E-05
			HE	5 to 60	9.4E-07	2.1E-05	3.8E-05	5.6E-05	4.8E-05	1.3E-06	3.4E-07	2.7E-05
		7754WCRT VF698MI	CT	5 to 1,000	5.4E-05					1.7E-08	8.5E-09	1.3E-08
			HE	5 to 1,000	2.4E-05					1.9E-08	9.3E-09	1.4E-08
		77580NTRP R10207	CT	5 to 100	3.7E-06	0.0E+00	0.0E+00	2.7E-06	2.7E-06	2.7E-06	2.7E-06	1.8E-06
			HE	5 to 100	1.6E-06	0.0E+00	0.0E+00	2.9E-06	2.9E-06	2.9E-06	2.9E-06	2.0E-06

OES	COU	Facility TRI-FID	Statistic	2022 Fenceline Analysis		Multi-Year Analysis							
				Distance with Risk Estimates above Benchmark	Risk Estimate @ 100 m	2015	2016	2017	2018	2019	2020	Arithmetic Average	
Laboratory Chemicals	Industrial/ Commercial Use as a Laboratory Chemical	41129CLGN CUSROU	CT	N/A	3.5E-08					1.8E-08		1.8E-08	
			HE	N/A	1.6E-08					2.1E-08		2.1E-08	
Manufacturing	Domestic Manufacturing	36752GPLS TONEPL	CT	5 to 100	4.9E-06	4.6E-07	6.0E-07	5.1E-07	3.8E-06	3.8E-06	5.2E-06	2.4E-06	
			HE	5 to 100	3.0E-06	5.0E-07	6.5E-07	5.6E-07	4.2E-06	4.2E-06	5.7E-06	2.6E-06	
		67215VLCN C6200S	CT	5 to 1,000	1.3E-05	2.0E-05	2.0E-05	2.4E-05	3.3E-05	9.8E-06	9.5E-06	1.9E-05	
			HE	5 to 100	4.1E-06	2.2E-05	2.2E-05	2.6E-05	3.6E-05	1.1E-05	1.0E-05	2.1E-05	
		70734VLCN MASHLA	CT	5 to 2,500	4.0E-05	7.1E-06	7.0E-06	7.9E-06	9.7E-06	2.0E-05	4.0E-05	1.5E-05	
			HE	5 to 1,000	1.3E-05	7.9E-06	7.8E-06	8.7E-06	1.1E-05	2.2E-05	4.4E-05	1.7E-05	
		7076WBLC BP21255	CT	5 to 1,000	6.5E-05	3.5E-06	2.0E-05	2.0E-05	2.6E-05	2.9E-05	2.4E-05	2.0E-05	
			HE	5 to 100	1.3E-05	3.8E-06	2.2E-05	2.2E-05	2.8E-05	3.1E-05	2.6E-05	2.2E-05	
		70776CBGG YRIVER	CT	5 to 100	3.2E-06	1.5E-06	1.2E-06	1.2E-06	1.3E-06	1.5E-06	1.3E-06	1.3E-06	
			HE	5 to 60	7.7E-07	1.6E-06	1.3E-06	1.3E-06	1.4E-06	1.6E-06	1.4E-06	1.4E-06	
		7754WBLC BP231NB	CT	5 to 1,000	4.2E-05	4.0E-06	8.3E-06	1.8E-05	2.2E-05	2.2E-05	1.4E-05	1.5E-05	
			HE	5 to 1,000	1.8E-05	4.4E-06	9.1E-06	2.0E-05	2.4E-05	2.5E-05	1.6E-05	1.6E-05	
		77571LPRT C2400M	CT	5 to 100	2.0E-06	1.7E-06	2.2E-06	2.6E-06	2.1E-06	1.9E-06	2.3E-06	2.1E-06	
			HE	5 to 60	9.8E-07	1.9E-06	2.4E-06	2.9E-06	2.3E-06	2.1E-06	2.5E-06	2.3E-06	
		94565DWC HMFOOTO	CT	5 to 100	5.0E-06	2.6E-05	7.9E-06	5.7E-06	5.1E-06	4.7E-06	7.2E-06	9.4E-06	
			HE	5 to 100	2.2E-06	2.8E-05	8.7E-06	6.2E-06	5.5E-06	5.1E-06	7.9E-06	1.0E-05	
		Domestic Manufacturing – Byproduct	25015DPNT B901WE	CT	N/A	N/A	3.4E-08	8.5E-08	8.3E-08	7.3E-08			6.9E-08
				HE	N/A	N/A	3.9E-08	9.5E-08	9.3E-08	8.2E-08			7.7E-08
	CT			N/A	N/A	5.4E-09						5.4E-09	

OES	COU	Facility TRI-FID	Statistic	2022 Fenceline Analysis		Multi-Year Analysis						
				Distance with Risk Estimates above Benchmark	Risk Estimate @ 100 m	2015	2016	2017	2018	2019	2020	Arithmetic Average
Manufacturing	Domestic Manufacturing – Byproduct	27306HMN TS149HO	HE	N/A	N/A	6.2E-09						6.2E-09
		70391DWC HMLouis	CT	N/A	N/A	0.0E+00	0.0E+00	0.0E+00				0.0E+00
			HE	N/A	N/A	0.0E+00	0.0E+00	0.0E+00				0.0E+00
		70669GRG GL1600V	CT	5 to 100	1.4E-06	1.0E-06	1.1E-06	1.1E-06	1.1E-06	1.0E-06	1.4E-06	1.1E-06
			HE	5 to 60	7.6E-07	1.1E-06	1.2E-06	1.2E-06	1.3E-06	1.1E-06	1.5E-06	1.2E-06
		70669PPGN DCOLUM	CT	5 to 1,000	1.7E-05	1.2E-05	1.4E-05	1.4E-05	1.2E-05	1.3E-05	1.3E-05	1.3E-05
			HE	5 to 100	9.2E-06	1.3E-05	1.5E-05	1.6E-05	1.3E-05	1.4E-05	1.4E-05	1.4E-05
		70734BRDN CLOUIS	CT	N/A	4.1E-07	1.7E-07	2.1E-07	2.8E-07	3.5E-07	3.1E-07	3.1E-07	2.7E-07
			HE	N/A	3.3E-07	1.9E-07	2.4E-07	3.1E-07	3.9E-07	3.5E-07	3.5E-07	3.1E-07
		70734BSFC RRIVER	CT	N/A	5.2E-07	4.0E-07	3.9E-07	4.2E-07	4.2E-07	3.9E-07	3.1E-07	3.9E-07
			HE	N/A	4.0E-07	4.6E-07	4.4E-07	4.8E-07	4.8E-07	4.4E-07	3.5E-07	4.4E-07
		70734RBCN N9156H	CT	5 to 1,000	1.5E-05	8.6E-06	8.3E-06	9.1E-06	8.9E-06	8.6E-06	7.8E-06	8.5E-06
			HE	5 to 1,000	7.1E-06	9.6E-06	9.3E-06	1.0E-05	9.9E-06	9.6E-06	8.6E-06	9.5E-06
		70764LLM NXHWY40	CT	N/A	3.7E-10	1.9E-06	2.8E-06	1.7E-06	1.7E-06	1.6E-06	1.2E-06	1.8E-06
			HE	N/A	2.8E-10	2.1E-06	3.1E-06	1.8E-06	1.8E-06	1.8E-06	1.4E-06	2.0E-06
		70765GRG GLHIGHW	CT	5 to 30	2.3E-07	1.6E-07	9.4E-08	6.7E-08	4.7E-08	1.2E-07	1.1E-07	9.9E-08
			HE	N/A	6.8E-08	1.8E-07	1.0E-07	7.5E-08	5.3E-08	1.3E-07	1.2E-07	1.1E-07
		70765THD WCHIGHW	CT	N/A	N/A	9.0E-09	9.7E-10	6.2E-09			8.4E-08	2.5E-08
			HE	N/A	N/A	1.0E-08	1.1E-09	6.8E-09			9.2E-08	2.8E-08
		7076WDDP SP21255	CT	N/A	N/A				0.0E+00			0.0E+00
HE	N/A		N/A				0.0E+00			0.0E+00		

OES	COU	Facility TRI-FID	Statistic	2022 Fenceline Analysis		Multi-Year Analysis								
				Distance with Risk Estimates above Benchmark	Risk Estimate @ 100 m	2015	2016	2017	2018	2019	2020	Arithmetic Average		
Manufacturing	Domestic Manufacturing - Byproduct	70805FRMS PGULFS	CT	5 to 100	9.2E-06	4.9E-06	3.4E-06	4.4E-06	5.1E-06	6.7E-06	4.1E-06	4.8E-06		
			HE	5 to 100	2.7E-06	5.4E-06	3.7E-06	4.8E-06	5.6E-06	7.3E-06	4.4E-06	5.2E-06		
		77015FRM NT2239H	CT	5 to 100	2.0E-06	3.0E-07	6.6E-07	1.7E-06	1.2E-06	1.1E-06			9.9E-07	
			HE	5 to 60	8.2E-07	3.4E-07	7.3E-07	1.9E-06	1.3E-06	1.2E-06			1.1E-06	
		77536CCDN TTIDAL	CT	N/A	1.1E-08	8.7E-09	1.1E-08	1.1E-08	1.0E-08	1.1E-08	8.9E-09	1.0E-08		
			HE	N/A	5.4E-09	9.5E-09	1.2E-08	1.3E-08	1.1E-08	1.2E-08	9.7E-09	1.1E-08		
		77978FRMS PPOBOX	CT	N/A	1.2E-08	0.0E+00	1.6E-08	1.0E-08	1.0E-08	1.6E-08	3.2E-08	1.4E-08		
			HE	N/A	7.8E-09	0.0E+00	1.7E-08	1.1E-08	1.1E-08	1.7E-08	3.5E-08	1.5E-08		
		78359CCDN THWY36	CT	5 to 10	1.5E-07	9.6E-08	1.4E-07	1.1E-07	9.6E-08	1.4E-07	9.7E-08	1.1E-07		
			HE	N/A	4.4E-08	1.0E-07	1.6E-07	1.2E-07	1.0E-07	1.5E-07	1.1E-07	1.2E-07		
		84074MXM GNROWLE	CT	10	1.7E-07	8.8E-08	2.5E-07	1.8E-07	1.6E-07	1.2E-07		1.6E-07		
			HE	N/A	5.3E-08	9.6E-08	2.7E-07	2.0E-07	1.8E-07	1.3E-07		1.7E-07		
		Processing as a Reactant or Intermediate	Processing as a Reactant (Feedstocks)	70805LLDS GCORNE	CT	5 to 100	8.2E-06	3.8E-06		3.7E-06	2.6E-06	6.0E-06	5.8E-06	4.4E-06
					HE	5 to 100	2.3E-06	4.2E-06		4.1E-06	2.8E-06	6.6E-06	6.4E-06	4.8E-06
29045HRD WC2114L	CT		N/A	N/A	2.7E-06						2.7E-06			
	HE		N/A	N/A	2.9E-06						2.9E-06			
53085LDRC H6100H	CT		N/A	N/A				2.7E-06			2.7E-06			
	HE		N/A	N/A				2.9E-06			2.9E-06			
71730DPNT L322SU	CT		5 to 1,000	8.0E-06	7.0E-06	5.7E-06	6.6E-06	7.4E-06	5.4E-06		6.4E-06			
	HE		5 to 100	5.0E-06	7.7E-06	6.3E-06	7.3E-06	8.1E-06	5.9E-06		7.0E-06			

OES	COU	Facility TRI-FID	Statistic	2022 Fenceline Analysis		Multi-Year Analysis						
				Distance with Risk Estimates above Benchmark	Risk Estimate @ 100 m	2015	2016	2017	2018	2019	2020	Arithmetic Average
Processing as a Reactant or Intermediate	Processing as a reactant in the production of hydrochlorofluorocarbons, hydrofluorocarbon, hydrofluoroolefin, and perchloroethylene	42029WSTL K24681	CT	5 to 1,000	6.3E-05	5.6E-05	4.8E-05	5.5E-05	6.2E-05	4.6E-05	5.1E-05	5.3E-05
			HE	5 to 1,000	3.5E-05	6.2E-05	5.2E-05	6.0E-05	6.8E-05	5.1E-05	5.6E-05	5.8E-05
	Processing for incorporation into formulation, mixtures or reaction products (petrochemicals derived manufacturing; agricultural products manufacturing; other basic organic and inorganic chemical manufacturing)	78362DPNT CHIGHW	CT	5 to 1,000	8.6E-05				1.9E-05	7.1E-05	5.4E-05	4.8E-05
			HE	5 to 1,000	2.5E-05				2.1E-05	7.7E-05	5.9E-05	5.2E-05
Recycling and Disposal	Disposal	12047NRLT C628SO	CT	N/A	3.9E-08	1.9E-08	5.1E-09	8.9E-09	5.9E-09	4.2E-08	8.3E-08	2.7E-08
			HE	N/A	2.3E-08	2.0E-08	5.6E-09	9.8E-09	6.5E-09	4.6E-08	9.1E-08	3.0E-08
		18014KYST NRT329	CT	N/A	N/A						2.7E-08	2.7E-08
			HE	N/A	N/A						2.9E-08	2.9E-08
		29448GNTC MPOBOX	CT	10	1.4E-07	2.4E-06	1.1E-06	1.9E-06	2.5E-06	9.0E-08	2.1E-06	1.7E-06
			HE	N/A	6.2E-08	2.6E-06	1.2E-06	2.1E-06	2.7E-06	9.8E-08	2.3E-06	1.8E-06
		43920VNRL L1250S	CT	N/A	1.4E-09	1.7E-09	1.1E-09	1.1E-09	1.3E-09	1.1E-09	1.5E-09	1.3E-09
			HE	N/A	7.9E-10	1.8E-09	1.2E-09	1.2E-09	1.4E-09	1.2E-09	1.6E-09	1.4E-09
		44011CHM TR35850	CT	N/A	6.7E-09	3.0E-08	9.1E-09	1.6E-07	1.0E-08	7.3E-09		4.4E-08
			HE	N/A	2.5E-09	3.3E-08	9.9E-09	1.8E-07	1.1E-08	8.0E-09		4.8E-08
	CT	N/A	1.1E-09	8.0E-08	7.8E-08	6.3E-08	2.1E-08	1.1E-09	9.5E-11	4.1E-08		

OES	COU	Facility TRI-FID	Statistic	2022 Fenceline Analysis		Multi-Year Analysis							
				Distance with Risk Estimates above Benchmark	Risk Estimate @ 100 m	2015	2016	2017	2018	2019	2020	Arithmetic Average	
Recycling and Disposal	Disposal	44044RSSN C36790	HE	N/A	4.0E-10	8.8E-08	8.6E-08	6.9E-08	2.3E-08	1.2E-09	1.0E-10	4.4E-08	
		44109CHM CL1010D	CT	N/A	1.6E-08	2.7E-08	2.7E-08	2.7E-08	2.7E-08	2.7E-08	2.7E-08	2.7E-08	2.7E-08
			HE	N/A	9.4E-09	2.9E-08	2.9E-08	2.9E-08	2.9E-08	2.9E-08	2.9E-08	2.9E-08	2.9E-08
		62201TRD WS7MOBI	CT	N/A	N/A	0.0E+00	0.0E+00	1.4E-10	0.0E+00	0.0E+00			2.8E-11
			HE	N/A	N/A	0.0E+00	0.0E+00	1.6E-10	0.0E+00	0.0E+00			3.2E-11
		63401CNTN NHIGHW	CT	N/A	N/A				1.1E-08				1.1E-08
			HE	N/A	N/A				1.2E-08				1.2E-08
		63701LNST R2524S	CT	5 to 30	3.2E-07				3.4E-07	3.3E-07	1.4E-10		2.2E-07
			HE	5 to 30	2.7E-07				3.7E-07	3.6E-07	1.6E-10		2.4E-07
		7080WCSR VC131AI	CT	N/A	2.0E-09	6.9E-10	1.1E-09	1.7E-09	5.4E-10	1.6E-09	1.6E-09		1.2E-09
			HE	N/A	6.1E-10	7.5E-10	1.2E-09	1.9E-09	5.9E-10	1.7E-09	1.7E-09		1.3E-09
		77643WST MNHWY73	CT	10	1.0E-07	1.3E-07	1.5E-07	3.7E-07	2.7E-07	1.0E-07	1.0E-07		1.9E-07
			HE	N/A	6.5E-08	1.4E-07	1.7E-07	4.0E-07	3.0E-07	1.1E-07	1.1E-07		2.1E-07
		85344WSTT S2523M	CT	N/A	4.3E-09	2.8E-09		6.0E-09	5.9E-09	5.1E-09			4.9E-09
			HE	N/A	2.6E-09	3.0E-09		6.5E-09	6.4E-09	5.5E-09			5.4E-09
		88220SDWS T3MILE	CT	100	1.1E-06			3.3E-07	3.4E-07	3.5E-07			3.4E-07
			HE	N/A	4.9E-07			3.8E-07	4.0E-07	4.1E-07			3.9E-07
		97812CHM CL17629	CT	N/A	N/A	6.9E-08	5.5E-08	5.4E-08	6.5E-08				6.1E-08
	HE		N/A	N/A	7.5E-08	6.0E-08	5.9E-08	7.1E-08				6.6E-08	
	Recycling	69145CLNH R5MISO	CT	10	1.8E-07	4.2E-08	2.0E-08	1.6E-07	8.3E-08	2.6E-07	3.8E-07		1.6E-07
HE			10	9.6E-08	4.5E-08	2.2E-08	1.8E-07	9.1E-08	2.8E-07	4.2E-07		1.7E-07	

OES	COU	Facility TRI-FID	Statistic	2022 Fenceline Analysis		Multi-Year Analysis						
				Distance with Risk Estimates above Benchmark	Risk Estimate @ 100 m	2015	2016	2017	2018	2019	2020	Arithmetic Average
Recycling and Disposal	Recycling	71730NVR NM309AM	CT	N/A	5.1E-08	2.7E-07	6.9E-08	7.1E-08	1.3E-07	3.6E-08	1.7E-08	1.0E-07
			HE	N/A	3.2E-08	3.0E-07	7.5E-08	7.8E-08	1.5E-07	3.9E-08	1.9E-08	1.1E-07
		77536SFTY K2027B	CT	N/A	3.3E-08	7.5E-07	5.3E-08	7.2E-08	1.0E-10	3.4E-08	1.1E-07	1.7E-07
			HE	N/A	1.6E-08	8.2E-07	5.8E-08	7.8E-08	1.2E-10	3.7E-08	1.2E-07	1.9E-07
		84029SFTY K11600	CT	10	1.6E-07	6.1E-08	1.3E-07	1.8E-07	6.8E-08	1.2E-07	6.1E-11	9.3E-08
			HE	N/A	5.1E-08	6.8E-08	1.5E-07	2.0E-07	7.4E-08	1.3E-07	6.7E-11	1.0E-07