

TO: NORMA CASTANEDA
FROM: RICK STUPKA *RS*
DATE: JUNE 29, 1994
SUBJECT: PRG COMMENTS-FINAL DRAFT

1. Suggested that the Introduction should contain the following statement: "These PRG default values for exposure are suitable for the CDH screen agreed to by the three signatories to the IAG. Other, less conservative factors, may be desirable for use in the feasibility Study/Corrective Measures Study (FS/CMS) stage of remediation. Revisions of this kind will be presented in a future document."

2. Table 26 requires a footnote to explain radionuclide units, which, I believe, are in risk/year per pCi/gram.

3. Section 4.2, Subsurface Soils. The "surface soil" scenario penetrates to 12 feet according to CDH. How do you define subsurface soils given this definition? If the residential scenario is 12 feet deep for surface soil exposure, is this distinction still relevant? In section 4.2.1, was the residential exposure keyed to the 12-foot depth?