

RESPONSE TO CDPHE'S COMMENTS ON
TECHNICAL MEMORANDUM NO 11 (FINAL)
CHEMICALS OF CONCERN FOR OU5

Response to Comment 1. Mr Spreng's observation is valid. Comparison of background with one site sample is not statistically valid. However, 1,1-dichloroethene was not eliminated based on this comparison. Due to an error in the concentration/toxicity screen it was eliminated at that stage. The error has been corrected and 1,1-dichloroethene will be evaluated in the RFI/RI Report. See also response to comment 3.

Response to Comment 2. Mr Spreng's comment is correct. However, the slope factor used in the COC TM (1.2 per mg/kg day) is the correct one and was estimated from the unit risk factor based on pharmacokinetic adjustments, as opposed to a route to route extrapolation based on breathing rate and body weight. In addition, the PPRG for 1,1-dichloroethene has been corrected.

On June 28, 1995, a printout from the IRIS data base was provided to Mr Spreng with this information highlighted.

Response to Comment 3. Mr Spreng's comment is correct. The Concentration/Toxicity screen of carcinogens in seep water was calculated incorrectly and a replacement table has been generated. However, this did not result in 1,1-dichloroethene being eliminated as a COC since it was identified as such based on non-carcinogenic effects. Since it also has carcinogenic effects, these effects will be evaluated in the RFI/RI Report.

Table 7.3 of the COC TM #11 was revised to correct the error and is submitted with the enclosed Document Modification Request, see Attachment 3.

Response to Comment 4. Mr Spreng's comment that the text in Section 2.7 states that a risk based concentration (RBC) comparison for subsurface soils was based on RBCs for a construction worker was not what was agreed to by the agencies. The text in this case is incorrect and will be modified to state the RBC comparison will be for residential exposure. The correct RBC, i.e. that for residential exposure, was used in Table 4.5.

Page 2.31 of the COC TM #11 was revised to address this comment and is submitted with the enclosed Document Modification Request, see Attachment 3.

Response to Comment 5. Mr Spreng's comment regarding the comparisons of OU5 concentrations to RFETS background concentrations is correct. The additional data is provided as supplemental data only, and the text does discuss some of this supplemental data.

Response to Comment 6. Mr Spreng requested a map showing the sitewide distribution of arsenic in groundwater. This map has been generated and is enclosed with this transmittal.

Response to Comment 7. Mr Spreng questioned if dissolved concentrations of groundwater constituents have been compared to background dissolved concentrations. Yes, and these comparisons are shown in Table A.4.