

May 31, 2013

SUBJECT: Response to Comments received from Region 6 on Claim 17381 Public Notice

REGIONAL WATER BOARD COMMENT: The Site does not pass Scenario 3a or any of the other vapor intrusion to indoor air pathway scenarios described in the Policy.

The "high concentration" source material was identified during confirmation soil sampling in 2011, following initial soil vapor extraction activities. The results indicated TPHg in soil at depths between 25 and 45 feet below ground surface at concentrations significantly exceeding the 200 mg/kg "high concentration" source defined in the "Technical Justification for Vapor Intrusion Media-Specific Criteria" (TJ Document)¹.

RESPONSE: The Site passes Policy Criterion 2a by Scenario 3a. The Site may have failed the criterion if the petroleum hydrocarbons were unweathered. However, the release at the Site is over 15 years old and soil vapor extraction has been used to remediate the soil from 2007 through present. Therefore, the elevated concentrations identified in the soil samples collected between 25 and 45 feet below ground surface at this Site cannot be considered unweathered LNAPL.