Folders → Read Mail →

From: "Stroble, J. R." (GATE.NMENV:StroblJ@wipp.carlsbad.nm.us)

To: "'Steve Zappe - NMED"'

CC: "Snider, Craig - DOE" , "Kehrman, Bob"

Sent: 22 Dec 1997 14:04:17

Subject: Response to Your Question Last Week

In our telephone conversation last week, you had asked why the Concentrations of Concern (COCs) in Appendix D20 (Confirmatory VOC Monitoring Plan) had increased from Revision 6 to 6.3. I had responded that the increase (approximately a factor of 16) was due to the difference in exposure time assumptions in the permit application risk assessment as opposed to the No-Migration calculations. I explained that the monitoring plan was written originally for the No-Migration Variance Petition, in which the maximum exposed individual (MEI) would be on the surface, inside the fence, and we had to assume a 35 year exposure, 24 hours/day. In the permit application (Appendix D9), the exposure assumption, was that the MEI was a worker, in which the exposure time would be no longer than 10 years at 1920 hours/year.

You also asked why the 1,1,1-Trichlorethane (111TCA) COC had increased much greater than the factor of 16. The reason for the increase is that we determined during our update of the COCs that 111TCA was not a carcinogen. The new COC was derived from the non-carcinogen hazard. Part of the confusion along the way (from hazard ranking to COC updates) has been that the proposed Subpart S rules listed 111TCA as a carcinogen in the action and cleanup level table, but with no slope factor, and no other toxicity documentation to our knowledge lists 111TCA as a carcinogen.

Although we changed the designation of 111TCA to a non-carcinogen in the COCs, it does not change the ranking of risk. We re-performed the risk-ranking and it turns out that the six remaining carcinogens make up 99% of the risk from carcinogens, and the three non-carcinogens make up 99% of the risk from non-carcinogens.

If you have questions regarding this explanation, please call me at 505-234-8256. If not, Merry Christmas!

Thanks,

J. R. Stroble