



# **PRELIMINARY ENDANGERMENT ASSESSMENT GUIDANCE MANUAL**

**(A guidance manual for evaluating hazardous substance release sites.)**

**State of California  
Environmental Protection Agency  
Department of Toxic Substances Control**

**January 1994  
(Revised October 2015)**

## Foreword

The Preliminary Endangerment Assessment (PEA) Guidance Manual was significantly revised in October 2013. Comments were collected from interested parties for one year. This Final PEA Guidance Manual has been revised in response to those comments and to include changes in science and/or policy since 2013. In the future, DTSC intends to revise this manual on a yearly basis or as needed.

This version of the manual consists mostly of minor editorial revisions as recommended in comments submitted to DTSC in the past year. The more significant changes are:

- The inclusion of certain human-health-risk-based Environmental Screening Levels (ESLs) developed by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) as potentially acceptable screening levels in a PEA.
- The revision of the alternative simplified exposure equations to incorporate the latest U.S. Environmental Protection Agency (USEPA) exposure parameters as listed in the Office of Solid Waste and Emergency Response (OSWER) memorandum, dated February 6, 2014.

Comments and suggestions for improvement of the PEA Guidance Manual should be submitted to:

**[PEAManualComments@dtsc.ca.gov](mailto:PEAManualComments@dtsc.ca.gov)**

This guidance describes currently technically defensible and consistent approaches for performing a PEA. This guidance is not a regulation and does not impose any requirements or obligations on the regulated community, but provides a suggested PEA framework.

Please Note: Links to non-Cal/EPA sites do not imply any official Cal/EPA or DTSC endorsements of or responsibility for the opinions, ideas, data, or products presented at those locations, or guarantee the validity of the information provided. Links to non-Cal/EPA servers are provided solely as a pointer to information on topics related to the PEA that may be useful to DTSC staff and the public.

Cover Photograph: Mono Lake, South Tufa Area, Mono County. Photo Courtesy of J. Michael Eichelberger

# TABLE OF CONTENTS

ACRONYMS AND ABBREVIATIONS .....	I
PREFACE .....	IV
ACKNOWLEDGEMENTS .....	VI
<b>CHAPTER ONE - INTRODUCTION</b>	
1.1 ORGANIZATION OF THIS MANUAL .....	1
1.2 DEFINITION/OBJECTIVES OF THE PEA.....	1
1.3 THE PEA WITHIN THE CLEANUP PROCESS .....	2
1.4 COST RECOVERY .....	7
<b>CHAPTER TWO – THE PEA INVESTIGATION</b>	
2.1 SCOPING.....	8
2.1.1 SCOPING MEETING .....	9
2.1.2 CONCEPTUAL SITE MODEL.....	9
2.2 BACKGROUND RESEARCH.....	12
2.2.1 RECORDS REVIEW .....	13
2.2.2 SITE INSPECTION.....	16
2.2.3 INTERVIEWS.....	17
2.3 PUBLIC PARTICIPATION.....	17
2.4 DATA COLLECTION AND EVALUATION.....	18
2.4.1 WORK PLAN PREPARATION.....	18
2.4.2 SAMPLING STRATEGY .....	22
2.4.2.1 SOIL SAMPLING (VADOSE ZONE).....	23
2.4.2.2 SOIL VAPOR SAMPLING .....	24
2.4.2.3 GROUNDWATER SAMPLING.....	24
2.4.2.4 SURFACE WATER SAMPLING .....	25
2.4.2.5 INDOOR AIR SAMPLING .....	26
2.4.2.6 BACKGROUND SAMPLING.....	26
2.4.3 QUALITY ASSURANCE AND QUALITY CONTROL MEASURES .....	27
2.4.4 ADDITIONAL REGULATORY REQUIREMENTS .....	28

2.4.5	DATA EVALUATION.....	29
2.4.5.1	EVALUATION OF ANALYTICAL METHODS .....	30
2.4.5.2	EVALUATION OF REPORTING LIMITS.....	31
2.4.5.3	EVALUATION OF QUALIFIED DATA.....	31
2.4.5.4	EVALUATION OF BLANKS.....	31
2.4.5.5	EVALUATION OF TENTATIVELY IDENTIFIED COMPOUNDS.....	32
2.4.5.6	COMPARISON OF SITE DATA WITH BACKGROUND.....	33
2.4.5.7	IDENTIFICATION OF CHEMICALS OF POTENTIAL CONCERN.....	33
2.5	HUMAN HEALTH SCREENING RISK EVALUATION.....	34
2.5.1	HUMAN HEALTH SCREENING LEVELS.....	35
2.5.2	SCREENING EVALUATION ASSUMPTIONS AND EXPOSURE FACTORS .....	37
2.5.2.1	EXPOSURE PATHWAYS AND MEDIA OF EXPOSURE .....	37
2.5.2.2	LAND USE.....	38
2.5.2.3	CHEMICAL GROUPS .....	38
2.5.2.4	EXPOSURE POINT CONCENTRATIONS .....	46
2.5.2.5	TOXICITY VALUES .....	46
2.5.3	RISK/HAZARD CHARACTERIZATION .....	47
2.5.4	ALTERNATIVE SIMPLIFIED EXPOSURE AND RISK EQUATIONS.....	48
2.5.4.1	SELECTION OF PATHWAYS INVOLVING ENVIRONMENTAL MEDIA .....	49
2.5.4.2	WATER PATHWAY .....	50
2.5.4.3	SOIL PATHWAY .....	55
2.5.4.4	AIR PATHWAY .....	58
2.5.4.5	ESTIMATION OF AIR CONCENTRATION .....	61
2.5.4.5.1	PARTICULATE MATTER.....	61
2.5.4.5.2	VAPORS OUTDOOR.....	62
2.5.4.5.3	VAPORS INDOOR – SOIL VAPORS .....	63
2.5.4.5.4	VAPORS INDOOR – GROUNDWATER .....	64
2.5.4.6	SUMMATION OF RISK/HAZARD FOR ALL MEDIA.....	64
2.5.5	UNCERTAINTY ANALYSIS.....	65
2.6	ECOLOGICAL SCREENING EVALUATION.....	65
2.6.1	SITE CHARACTERIZATION.....	66
2.6.2	BIOLOGICAL CHARACTERIZATION .....	66
2.6.3	PATHWAY ASSESSMENT .....	67
2.6.4	QUALITATIVE SUMMARY.....	68
2.7	FAIR MARKET VALUE OF THE PROPERTY .....	69

2.8 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION .....	69
--	----

## CHAPTER THREE – PREPARATION OF THE PEA REPORT

3.1 SUGGESTED REPORT FORMAT.....	71
3.2 SUGGESTED REPORT CONTENTS.....	71
3.2.1 EXECUTIVE SUMMARY .....	71
3.2.2 INTRODUCTION.....	72
3.2.3 SITE DESCRIPTION .....	73
3.2.3.1 SITE IDENTIFICATION.....	73
3.2.3.2 SITE GEOLOGY AND HYDROGEOLOGY .....	74
3.2.4 BACKGROUND .....	74
3.2.4.1 SITE STATUS AND HISTORY .....	74
3.2.4.2 HAZARDOUS MATERIAL/SUBSTANCE/WASTE MANAGEMENT INFORMATION .....	75
3.2.4.3 CURRENT AND HISTORICAL USES OF SURROUNDING PROPERTIES .....	76
3.2.4.4 AAI REQUIRED INFORMATION .....	76
3.2.4.5 RECORDS REVIEW .....	76
3.2.4.6 SITE RECONNAISSANCE .....	77
3.2.4.7 INTERVIEWS.....	77
3.2.5 APPARENT PROBLEM .....	78
3.2.6 ENVIRONMENTAL SETTING .....	78
3.2.6.1 CONCEPTUAL SITE MODEL.....	78
3.2.6.2 FACTORS RELATED TO SOIL PATHWAYS .....	78
3.2.6.3 FACTORS RELATED TO WATER PATHWAYS.....	80
3.2.6.4 FACTORS RELATED TO AIR PATHWAYS .....	81
3.2.7 SAMPLING ACTIVITIES AND RESULTS.....	83
3.2.7.1 SUMMARY OF ACTIVITIES .....	83
3.2.7.2 PRESENTATION OF DATA .....	83
3.2.7.3 DISCUSSION OF ANALYTICAL RESULTS.....	83
3.2.8 HUMAN HEALTH SCREENING EVALUATION .....	84
3.2.8.1 EXPOSURE PATHWAYS AND MEDIA OF CONCERN .....	84
3.2.8.2 EXPOSURE CONCENTRATIONS AND CHEMICALS .....	84
3.2.8.3 HUMAN HEALTH SCREENING LEVELS .....	84
3.2.8.4 TOXICITY VALUES .....	85
3.2.8.5 RISK CHARACTERIZATION SUMMARY.....	85

3.2.9	ECOLOGICAL SCREENING EVALUATION.....	86
3.2.9.1	SITE CHARACTERIZATION .....	86
3.2.9.2	BIOLOGICAL CHARACTERIZATION.....	86
3.2.9.3	PATHWAY ASSESSMENT.....	86
3.2.9.4	QUALITATIVE SUMMARY .....	86
3.2.10	COMMUNITY PROFILE .....	87
3.2.11	OPINION OF ENVIRONMENTAL PROFESSIONAL (REQUIRED BY AAI).....	87
3.2.12	CONCLUSIONS AND RECOMMENDATIONS.....	87
3.2.12.1	SUMMARY AND CONCLUSIONS .....	87
3.2.12.2	RECOMMENDATIONS.....	87
3.2.12.3	DATA GAPS (REQUIRED BY AAI).....	89
3.2.12.4	PRELIMINARY SCOPING RECOMMENDATIONS.....	89
3.2.13	SIGNATURE(S) AND QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL(S), INCLUDING STATEMENTS (REQUIRED BY AAI).....	90
	<b>GLOSSARY.....</b>	<b>91</b>
	<b>REFERENCES.....</b>	<b>94</b>
	<b>APPENDIX A .....</b>	<b>97</b>
	TABLE 1 SCREENING LEVEL DERMAL ABSORPTION FRACTIONS (ABS) FROM SOIL.....	98
	TABLE 2 SAMPLE EXPOSURE PATHWAY ANALYSIS FOR AN ECOLOGICAL SCREENING EVALUATION .....	99
	<b>FIGURES</b>	
	FIGURE 1- 1 CLEANUP PROCESS.....	5
	FIGURE 1- 2 PRELIMINARY ENDANGERMENT ASSESSMENT PROCESS DIAGRAM .....	6
	FIGURE 2- 1 EXAMPLE OF CONCEPTUAL SITE MODEL RECEPTOR NETWORK.....	11
	FIGURE 2- 2 DERIVATION OF HAZARD INDEX EQUATION FOR NON-VOCs IN WATER .....	51
	FIGURE 2- 3 DERIVATION OF HAZARD INDEX EQUATION FOR VOCs IN WATER .....	52
	FIGURE 2- 4 DERIVATION OF RISK EQUATION FOR NON-VOCs IN WATER .....	53
	FIGURE 2- 5 DERIVATION OF RISK EQUATION FOR VOCs IN WATER.....	54
	FIGURE 2- 6 DERIVATION OF HAZARD INDEX EQUATION FOR SOIL.....	56
	FIGURE 2- 7 DERIVATION OF RISK EQUATION FOR SOIL .....	57
	FIGURE 2- 8 DERIVATION OF HAZARD INDEX FOR EQUATION FOR AIR .....	59
	FIGURE 2- 9 DERIVATION OF RISK EQUATION FOR AIR .....	60

FIGURE 2- 10 ESTIMATION OF AIR CONCENTRATION FOR NON-VOCS ..... 62

FIGURE 3- 1 SUGGESTED REPORT FORMAT..... 72

**TABLES**

TABLE 2- 1 GENERIC FIELD SAMPLING WORK PLAN TABLE OF CONTENTS..... 21

TABLE 2- 2 QUALITY ASSURANCE/QUALITY CONTROL SAMPLES..... 28

TABLE 2-3 EXAMPLES OF POTENTIALLY UNSUITABLE ANALYTICAL TECHNIQUES ..... 30

TABLE 2- 4 POTENCY EQUIVALENCY FACTORS (PEF) FOR PAHs ..... 39

TABLE 2- 5 TOXICITY EQUIVALENCY FACTORS FOR DIOXINS AND DIOXIN-LIKE COMPOUNDS..... 41

## ACRONYMS AND ABBREVIATIONS

<b>AAI</b>	All Appropriate Inquiries
<b>AQMD</b>	Air Quality Management District
<b>ARAR</b>	Applicable or Relevant and Appropriate Requirement
<b>AT</b>	Averaging Time
<b>ATSDR</b>	Agency for Toxic Substances and Disease Registry
<b>BaP</b>	Benzo(a)pyrene
<b>BIOS</b>	Biogeographic Information and Observation System
<b>BTEX</b>	Benzene, Toluene, Ethyl Benzene and Xylenes
<b>Cal/EPA</b>	California Environmental Protection Agency
<b>CARB</b>	California Air Resources Board
<b>CCR</b>	California Code of Regulations
<b>CEQA</b>	California Environmental Quality Act
<b>CERCLA</b>	Comprehensive Environmental Response, Compensation and Liability Act
<b>CERCLIS</b>	Comprehensive Environmental Response, Compensation and Liability Information System
<b>CFR</b>	Code of Federal Regulations
<b>CGI</b>	Combustible Gas Indicator
<b>CHHSL</b>	California Human Health Screening Level
<b>COPCs</b>	Chemicals of Potential Concern
<b>CSM</b>	Conceptual Site Model
<b>CUPA</b>	Certified Unified Program Agencies
<b>DFW</b>	California Department of Fish and Wildlife (formerly California Department of Fish and Game ( <b>DFG</b> ))
<b>DPH</b>	California Department of Public Health
<b>DOT</b>	Department of Transportation
<b>DTSC</b>	Department of Toxic Substances Control
<b>DQO</b>	Data Quality Objective
<b>DWR</b>	California Department of Water Resources
<b>ERNS</b>	Emergency Response Notification System
<b>ESL</b>	Environmental Screening Levels
<b>GC</b>	Gas Chromatography
<b>HASP</b>	Health and Safety Plan
<b>HEAST</b>	Health Effects Assessment Summary Tables
<b>HERO</b>	Human and Ecological Risk Office
<b>HHRA</b>	Human Health Risk Assessment
<b>HI</b>	Hazard Index
<b>HSC</b>	Health and Safety Code
<b>HWIS</b>	Hazardous Waste Information System
<b>IDW</b>	Investigation Derived Waste
<b>IRIS</b>	Integrated Risk Information System
<b>IUR</b>	Inhalation Unit Risk
<b>J&amp;E</b>	Johnson & Ettinger



<b>LEL</b>	Lower Explosive Limit
<b>MCL</b>	Maximum Contaminant Level
<b>mmHg</b>	Millimeters of Mercury
<b>MOA</b>	Memorandum of Agreement
<b>NAWQA</b>	National Water Quality Assessment Program
<b>NCP</b>	National Contingency Plan
<b>NDDB</b>	Natural Diversity Database
<b>NFA</b>	No further action
<b>NPDES</b>	National Pollution Discharge Elimination System
<b>NPL</b>	National Priorities List
<b>NOA</b>	Naturally Occurring Asbestos
<b>NOAA</b>	National Oceanic and Atmospheric Administration
<b>OEHHA</b>	Office of Environmental Health Hazard Assessment
<b>O&amp;M</b>	Operation and Maintenance
<b>OSHA</b>	Occupational Safety and Health Administration
<b>OVA</b>	Organic Vapor Analyzer
<b>PAH</b>	Polycyclic Aromatic Hydrocarbons
<b>PA/SI</b>	Preliminary Assessment/Site Investigation
<b>PCBs</b>	Polychlorinated Biphenyls
<b>PCDD</b>	Polychlorinated Dibenzo-p-dioxins
<b>PCDF</b>	Polychlorinated Dibenzofurans
<b>PEA</b>	Preliminary Endangerment Assessment
<b>PEF</b>	Potency Equivalency Factor
<b>PHG</b>	Public Health Goal
<b>PID</b>	Photoionization detector
<b>PLMve</b>	Polarized Light Microscopy visual evaluation
<b>PPB</b>	Parts per billion
<b>PPRTVs</b>	Provisional Peer Reviewed Toxicity Values
<b>PQL</b>	Practical Quantification Limit
<b>PRP</b>	Potential Responsible Parties
<b>QA/QC</b>	Quality Assurance/Quality Control
<b>RAGS</b>	Risk Assessment Guidance for Superfund
<b>RAO</b>	Remedial Action Objective
<b>RCRA</b>	Resource Conservation and Recovery Act
<b>REL</b>	Reference Exposure Level
<b>RME</b>	Reasonable Maximum Exposure
<b>RfC</b>	Reference Concentration
<b>RfD</b>	Reference Dose
<b>RI/FS</b>	Remedial Investigation/Feasibility Study
<b>RSL</b>	Regional Screening Level
<b>RWQCB</b>	Regional Water Quality Control Board
<b>SF</b>	Slope Factor (also Cancer Potency Factor)
<b>SFBRWQCB</b>	San Francisco Bay Regional Water Quality Control Board
<b>SQL</b>	Sample Quantification Limit
<b>STSC</b>	Superfund Health Risk Technical Support Center
<b>SWAMP</b>	Surface Water Ambient Monitoring Program

<b>SWRCB</b>	State Water Resources Control Board
<b>2,3,7,8-TCDD</b>	2,3,7,8-tetrachloro-dibenzo-p-dioxin
<b>TIC</b>	Tentatively Identified Compound
<b>TPH</b>	Total Petroleum Hydrocarbons
<b>TRI</b>	Toxics Release Inventory
<b>TSD</b>	Treatment, Storage, and Disposal
<b>UCL</b>	Upper Confidence Limit
<b>UEL</b>	Upper Explosive Limit
<b>URFs</b>	Unit Risk Factors
<b>USEPA</b>	United States Environmental Protection Agency
<b>USGS</b>	United States Geological Service
<b>VOC</b>	Volatile Organic Compound
<b>WHO</b>	World Health Organization

## PREFACE

This document updates the *Preliminary Endangerment Assessment Guidance Manual* (1994, Second Printing, June 1999). The previous guidance should no longer be used; however, issuance of this new manual does not invalidate Preliminary Endangerment Assessments (PEAs) completed before (or in progress prior to) its release. This guidance manual differs from the 1994 version most significantly in the inclusion of:

- components of the All Appropriate Inquiries (AAI) process,
- simplification of human health screening risk evaluation, and
- addition of a methodology for evaluating human health risks from soil vapor intruding indoors.

The primary intended users of the manual are environmental consultants conducting PEAs for private parties with Department of Toxic Substances Control (DTSC) oversight. Because experience and professional judgment are vital for drawing the conclusions and presenting the recommendations requisite in the PEA, private parties are responsible for procuring the services of a competent Environmental Professional when preparing a PEA report. The manual should also be used by State Contractors and DTSC staff conducting PEAs with State funds. Other agencies or private entities requiring the use of the manual will be responsible for acting as lead agency and providing oversight for the project. Sites being evaluated as abandoned mine lands, should refer to the most current version of the *Abandoned Mine Lands Preliminary Assessment Handbook*<sup>1</sup>. School districts, county offices of education and charter entities seeking state bond funding and who are required to prepare a PEA in accordance with Education Code §17078.54, subdivision (c)(1) (charter schools) or §17268 and §17213.1 (public schools) should discuss the contents of the PEA with the DTSC project manager assigned to their site to ensure that the document will satisfy all requirements.

The PEA incorporates much of the information required for completion of the preliminary assessment and site inspection (PA/SI) investigations currently used by the USEPA. The PEA also has background information requirements similar to a Phase I Environmental Site Assessment required by most lending institutions prior to commercial real estate transactions. An attempt has been made to include information required by the AAI Rule. Although overall PEA requirements are more comprehensive than requirements for the PA/SI and Phase I Assessments, the information gathered for the PEA may also be useful for those purposes, as well as address potential data gaps and address the “degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation” criterion as part of the AAI. Specific requirements of the PEA that are not typically required for these other types of investigations include the site-specific human health and ecological

---

<sup>1</sup>DTSC. 1999. *Abandoned Mine Lands Preliminary Assessment Handbook*, Second Printing, February. [http://www.dtsc.ca.gov/sitecleanup/brownfields/upload/aml\\_handbook.pdf](http://www.dtsc.ca.gov/sitecleanup/brownfields/upload/aml_handbook.pdf)

screening evaluations, public participation requirements, data collection, and scoping activities.

The manual attempts to provide useful guidance for all possible site sizes and scenarios. This manual is not intended to be a "cook book" of mandatory ingredients required to produce a PEA report. A critical goal of scoping the PEA is to agree upon the focus of the PEA investigation and the degree to which each requirement in the manual applies to the subject site. Although each element of the PEA report should be addressed, the scope of the investigation and level of detail required for each section should be discussed with the DTSC project manager overseeing the PEA activities. Each section should be reviewed to determine the appropriate level of action for a given site; however, it is DTSC's expectation that a PEA will be written as a stand-alone document. While other reports may be referenced if specific detail needs to be provided, information used as the basis for site conclusions needs to be included within the PEA.

## **ACKNOWLEDGEMENTS**

The 2015 manual was prepared by the following DTSC staff:

Lynn Nakashima, Senior Hazardous Substances Scientist (co-author);  
Kimiko Klein, Ph.D., Staff Toxicologist Emerita (co-author)  
Members of the Geological Services Branch, Human and Ecological Risk Office, and  
Ecological Risk Assessment Section.

The 1994 manual was developed by the following DTSC staff:

Megan Cambridge, (co-author);  
Eric Garcia, (co-editor; co-author);  
Elaine Stratton, (co-editor; co-author);  
Technical services support staff and former Office of Scientific Affairs

# CHAPTER ONE

## INTRODUCTION

The Preliminary Endangerment Assessment (PEA) provides basic information for determining if there has been a release of a hazardous substance that presents a risk to human health or the environment. The PEA is a formal step in the Department of Toxic Substances Control's (DTSC) cleanup program (While the program has been traditionally known as the site mitigation program, since incorporation of several additional components, the process will be referred to as the cleanup process or cleanup program to encompass the additional program elements). The PEA is intended to be the initial investigation of a site or property(ies) (hereinafter site also means property or properties) and is the first step in identifying whether a release or threatened release of a hazardous waste/substance/material has occurred, estimating the potential risk to public health and the environment, evaluating whether immediate response is needed to reduce the risk, and determining if further action/investigation is needed. In comparison, "All Appropriate Inquiries" (AAI) is the process of evaluating a property's environmental conditions and assessing potential liability for any contamination. An AAI is conducted to obtain certain liability protections under the federal Superfund Law known as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The federal regulations for conducting All Appropriate Inquires can be found in 40 Code of Federal Regulations Part 312 (40 CFR 312).

### 1.1 ORGANIZATION OF THIS MANUAL

This guidance manual is organized into three chapters. Chapter 1 provides background information defining the PEA, explains how the PEA ties into the cleanup process and discusses DTSC's responsibility to recover costs associated with oversight of the PEA. Chapter 2 provides technical guidance for conducting the PEA investigation, which includes scoping the project, acquiring background information, procedures for gathering reliable chemical and physical data, and methodologies for conducting the human health and ecological screening evaluations. Chapter 3 provides the suggested outline for presentation of the PEA investigation results in a PEA report. Chapter 3 also provides general guidance on how to organize the PEA report and a detailed description of information that should be included in the report.

### 1.2 DEFINITION/OBJECTIVES OF THE PEA

The PEA is defined in California Health and Safety Code (HSC), Division 20, Chapter 6.8, Section 25319.5 (HSC §25319.5) as follows:

Preliminary Endangerment Assessment means an activity which is performed to determine whether current or past waste management practices have resulted in the release or threatened release of hazardous substances which pose a threat to

public health or the environment. The PEA is also applicable to releases of hazardous materials.

Specific objectives of the PEA include:

- Determining if a release of hazardous wastes/substances/materials has occurred at a site and delineating the general extent of the contamination.
- Estimating the potential threat to public health and/or the environment posed by the site and providing an indicator of the relative risk.
- Determining if an interim action is required to reduce an existing or potential threat to public health or the environment.
- Completing preliminary project scoping activities to identify data gaps and possible remedial action strategies that would form the basis for development of a site strategy.
- Providing the data and information to DTSC.
- Assessing and providing for the informational needs of the community.

### **1.3 THE PEA WITHIN THE CLEANUP PROCESS**

DTSC's cleanup process can be divided into several general phases: site evaluation, interim action, site characterization, remedial action, certification and operation and maintenance. The PEA is the initial investigation of the site and is completed during the site evaluation phase. Elements of the site evaluation phase are discussed in the following section. Figure 1-1 presents a flow chart of the site cleanup process. Detailed information regarding the entire cleanup process can be obtained by contacting one of DTSC's regional offices or headquarters office.

The site evaluation phase of the cleanup process includes activities such as site discovery; site screenings; the PEA; and potentially responsible party searches.

Throughout the site evaluation phase, human and ecological risk-based assessments are conducted. The risk-based assessments begin as qualitative judgments that become progressively more quantitative as additional site specific information is collected and the conceptual site model (CSM) becomes more refined. As indicated in Figure 1-1, there may be circumstances when a PEA may not be initially conducted, and remedial investigation (RI) and quantitative risk assessment (RA) are performed instead.

At any time during or following the site evaluation phase, an interim action may be necessary. Interim actions are those actions taken to eliminate any immediate threats to public health or the environment resulting from conditions at the site. These actions generally include, but are not limited to, fencing the site, hot spot removals of contaminated areas, removing containers of hazardous substances/wastes, and/or

providing alternative water supplies. Interim actions should be identified and implemented as early as possible during the site evaluation process.

Site discovery, the first step of site evaluation, involves the identification of known or potentially contaminated properties that were previously unknown to DTSC. Following discovery, a site screening is conducted by DTSC staff to determine whether a property should be evaluated further and whether the property falls within the jurisdiction of DTSC's cleanup authority. Based on the screening, one or more of the following recommendations will generally be made:

- No action required;
- Site referred to another agency;
- PEA required; and/or
- Interim action required.

The determination that a PEA is needed may occur after a property has been screened during the site discovery phase or a Project Proponent may voluntarily request DTSC to provide oversight of the preparation of a PEA. Typical scenarios for conducting the PEA include:

- DTSC identifies a property with a known or suspected release of hazardous substances/wastes/materials and contacts the Responsible Party(s) to initiate the investigation. The Responsible Party(s) either agrees to assess the site and enters into a Cleanup Agreement or DTSC issues an administrative order requiring the completion of the PEA with penalties for non-compliance.
- A Project Proponent, who voluntarily requests oversight from DTSC or a Regional Water Quality Board (RWQCB) to oversee completion of a PEA, submits an application to DTSC or a RWQCB initiating the Memorandum of Agreement (MOA) process<sup>2</sup>. The California Environmental Protection Agency (Cal/EPA), DTSC, the State Water Resources Control Board and RWQCBs have signed a MOA regarding the regulatory oversight of brownfield sites. The purpose is to improve coordination between DTSC and the boards and the oversight of cleanup activities. The MOA was designed to accomplish several objectives including limiting oversight to only one agency and establishing procedures and guidelines to identify that agency. The MOA also designed a uniform site assessment procedure, defines the roles of support agencies, requires opportunity for public involvement, commits regulatory agencies to timeframes for review, and commits the agencies to coordinate and communicate on brownfield properties.

---

<sup>2</sup> The MOA process is more fully described on the SWRCB web page at:  
[http://www.swrcb.ca.gov/water\\_issues/programs/brownfields/docs/bfmoa.pdf](http://www.swrcb.ca.gov/water_issues/programs/brownfields/docs/bfmoa.pdf)  
The application to request agency oversight is located on the DTSC web page at:  
<http://www.dtsc.ca.gov/SiteCleanup/Brownfields/BrownfieldsVoluntaryProgram.cfm>



- A site with a known or suspected release of hazardous substances/wastes/materials is identified, but the responsible person(s) have not been identified and potential or significant public health or environmental threats warrant use of DTSC's resources to assess the site.

Figure 1-2 presents a diagram of the PEA process from the point of initiation with DTSC to preparation of the final report. As seen in the diagram, Initiate PEA, Background Research, Data Evaluation, and Report Preparation are steps required for all PEA investigations. The majority of the investigation's flexibility lies within Public Participation, Sampling, and Human Health and Environmental Screening Evaluations. The requirements under these sections are dependent upon site-specific circumstances and DTSC staff should be consulted prior to proceeding. All of the sections in the diagram are flexible with regard to the level of effort required for each site.

The completed PEA report provides the information necessary to determine the need for further action at the site. DTSC staff will review the data in the PEA report to determine if the recommendations in the report are justified and supported. Sites requiring no further action will be released from DTSC oversight requirements. However, if information becomes available at a later date which indicates previously unknown or additional problems may exist, DTSC may initiate additional investigations at the site. Sites with significant contamination requiring further action will move along in the cleanup process for removal and/or remedial actions. In either case, DTSC will issue a letter formalizing completion of the PEA, approving or disputing the recommendations, and detailing any recommendations or requirements not presented in the PEA report that DTSC feels are necessary to address the site's contamination.

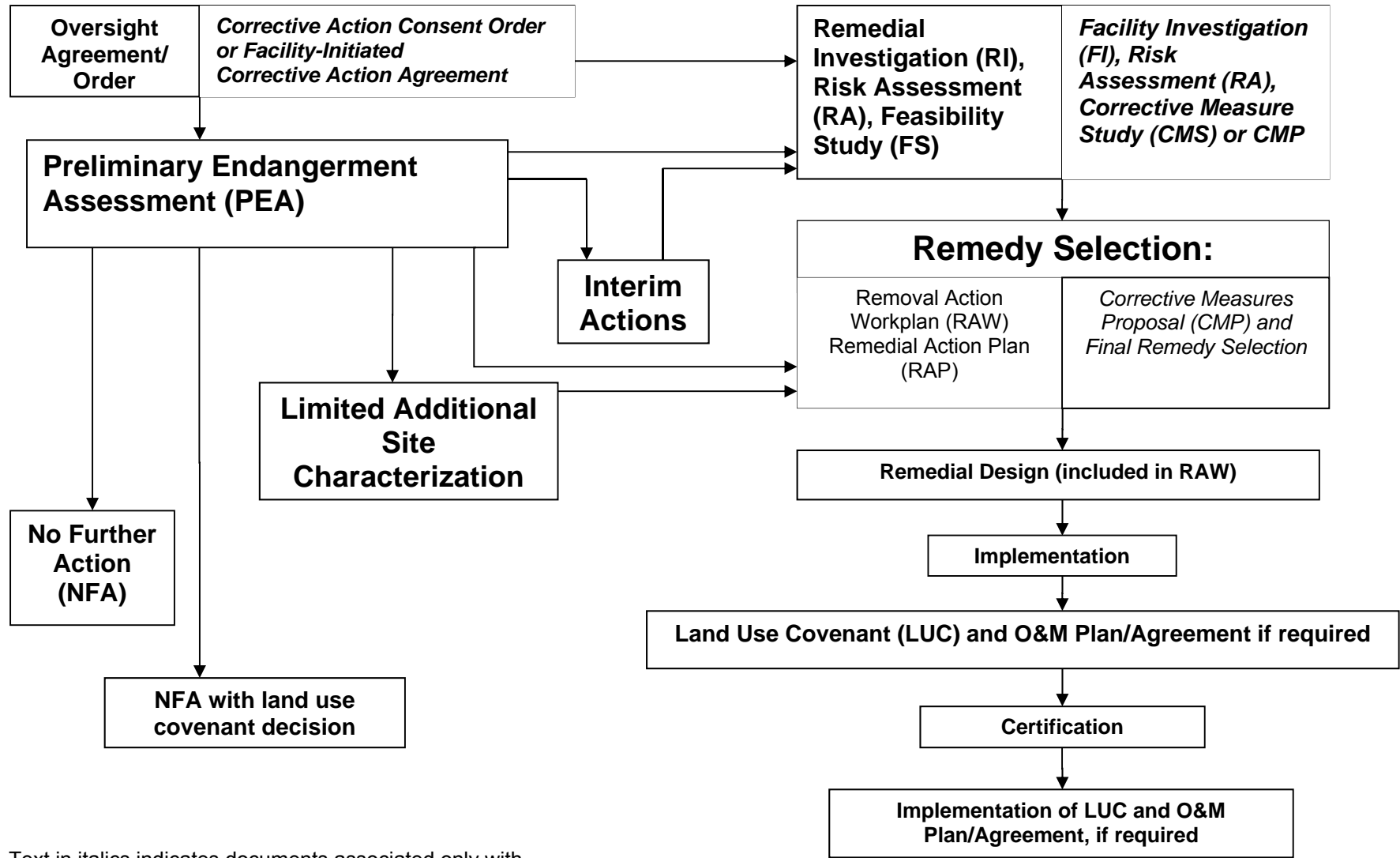
DTSC approval of a "no further action (NFA)" recommendation signifies that DTSC's concerns at the site have been addressed; however, a qualified NFA may be provided if other agencies require further action based on concerns not addressed during the PEA. For example, the RWQCB may require actions to remove an underground tank holding petroleum products. Whenever possible, the preparer and DTSC staff should coordinate with other agencies to address their concerns during the PEA.

Following completion of the PEA, a base-line potentially responsible party (PRP) search may be necessary to identify the principal parties potentially liable for mitigating contamination at the site. The most current version of US EPA's PRP search Manual may be consulted to assist in the search<sup>3</sup>. The information required to complete the baseline PRP search should be contained in the PEA report. PRPs identified by the search may be required to participate in the work to be conducted beyond the PEA.

---

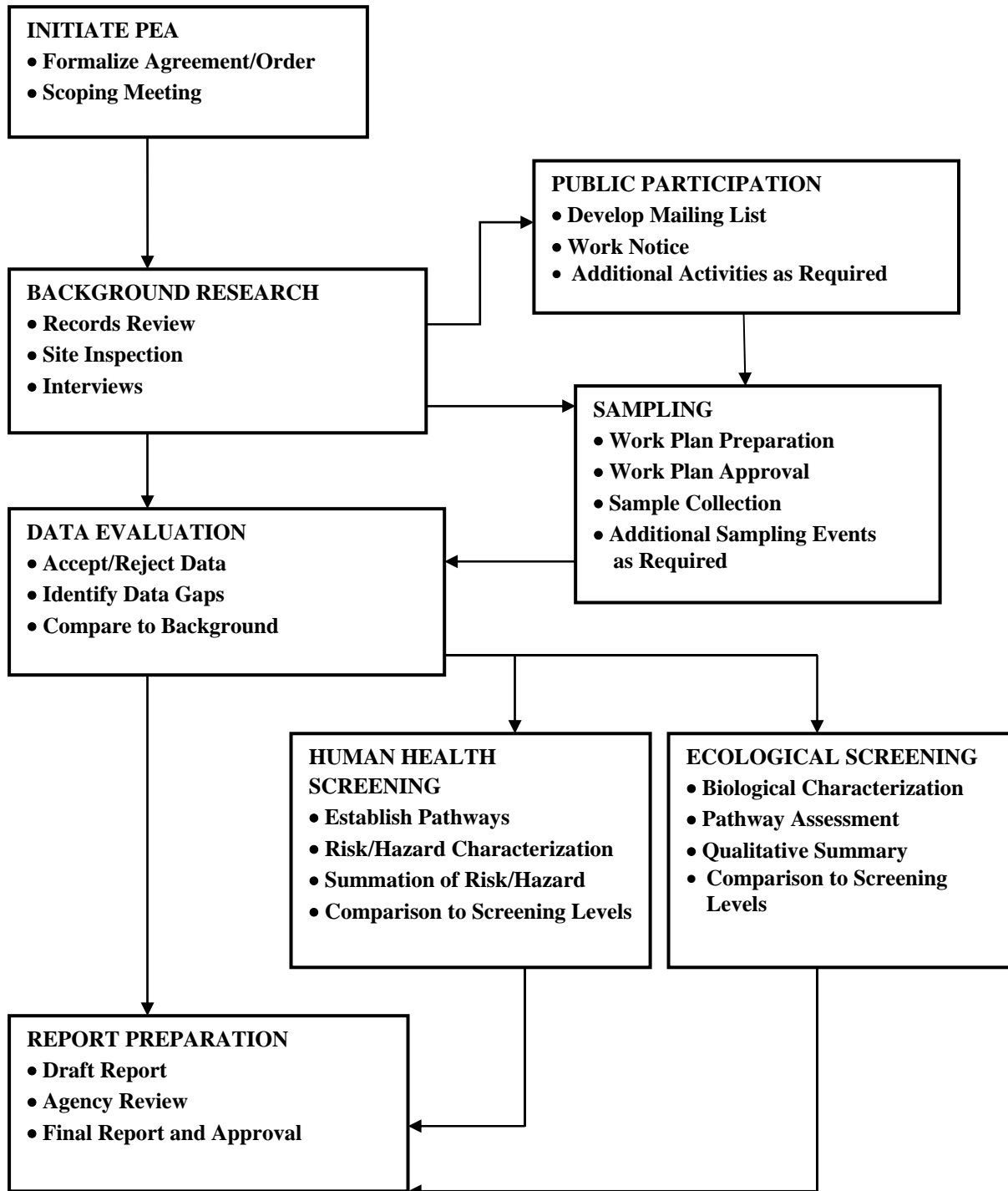
<sup>3</sup> USEPA. 2017. PRP Search Manual (2017 edition). EPA 330-B-17-001. September. <https://www.epa.gov/enforcement/prp-search-manual>

**FIGURE 1- 1 CLEANUP PROCESS**



Text in italics indicates documents associated only with Corrective Action (HSC Chapter 6.5)

**FIGURE 1- 2 PRELIMINARY ENDANGERMENT ASSESSMENT PROCESS DIAGRAM**



## **1.4 COST RECOVERY**

California law requires DTSC to recover all costs, including any accrued interest, incurred by DTSC associated with the investigation and cleanup of contaminated sites (HSC § 25360 and §25360.1). The final cost for oversight depends on the number of hours expended by DTSC staff. The Responsible Party(s) or Project Proponent(s) will be billed on a quarterly basis for costs incurred. Depending on the type of cleanup agreement, the Responsible Party(s) or Project Proponent(s) may be required to provide DTSC with an advance payment based on an estimate of the oversight costs.

## CHAPTER TWO

### THE PEA INVESTIGATION

Conducting a PEA investigation involves scoping the project, collecting and reviewing background information and chemical data, defining the community, and evaluating potential risks to public health and the environment. This chapter discusses methodologies for assessing the level of community interest in the site, identifies potential sources for locating information pertinent to the site investigation, provides procedures for acquiring reliable chemical data, and presents methodologies for completing screening level evaluations of human and ecological health risks related to site conditions.

If the PEA is being conducted as part of an All Appropriate Inquiries (AAI), the persons or businesses conducting the PEA will need to meet the standards and practices included in the U.S. Environmental Protection Agency's (USEPA) final rule dated November 1, 2006 as required under §101 (35) (B) (ii) and §101 (35)(B) (iii) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and 40 CFR Part 312<sup>4</sup> or the most recent approved rule. This manual attempts to include those requirements, but the reader is advised to review the federal statute to ensure compliance with the regulatory requirements and standards for AAI. The AAI requires that completion of specific portions be conducted by an Environmental Professional having specific educational and experience requirements. With respect to the PEA, individuals conducting engineering and geological work must be in conformance with applicable state law including, but not limited to, Business and Professions Code § 6735 and §7835.

#### 2.1 SCOPING

The Environmental Professional<sup>5</sup> responsible for preparing the PEA has some flexibility regarding the focus of the PEA and the emphasis to be placed on each part of the investigation. Limits of this flexibility will be defined for each site by the DTSC project manager through the scoping process. The Environmental Professional and project manager should identify the scope of activities to be performed to ensure the activities are appropriate for site-specific conditions and objectives. Agreeing ahead of time to the scope of activities and remedial action objectives (RAOs) should aid in maximizing effective expenditure of time and money. The final report should document activities performed according to this manual and provide rationale for those PEA requirements not addressed.

---

<sup>4</sup> More information regarding US EPA's All Appropriate Inquiries can be found on their Web page at: <https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries>

<sup>5</sup> The term Environmental Professional is used to describe the person who is preparing the PEA; however, geologic or engineering plans, specifications, drawings, and reports must be prepared by, or under the direct supervision of a California professional geologist or civil engineer, as appropriate, who will review and sign all such documents indicating responsibility for their content.

### 2.1.1 SCOPING MEETING

After signing an agreement or order, the first step in conducting the PEA investigation is to hold a scoping meeting between DTSC staff (e.g., geologist, toxicologist, occupational safety and health professional, project manager, etc.), the party required to complete the PEA and the Environmental Professional(s) assigned to do the work. The purpose of the meeting is to agree upon the approach for collecting information and develop a strategy for completing activities appropriate for the site in a safe manner. During the scoping meeting, plans should be made to identify:

- A schedule for activities;
- Roles and responsibilities;
- The amount of information previously collected and the need for background research and data collection;
- The desire to include “All Appropriate Inquiries” requirements within the PEA;
- Public participation needs; and
- The need for expedited response actions.

Additional meetings may be held throughout the investigation to review new information collected and/or update site strategy. The USEPA currently recommends the Triad approach to site investigation and cleanup. There are three components to Triad: systematic (or strategic) planning, dynamic work strategies, and real-time measurement systems. An agreement to use the Triad approach should be considered at the scoping meeting. For more information, go to the US EPA Triad Central website at [www.triadcentral.org](http://www.triadcentral.org).

### 2.1.2 CONCEPTUAL SITE MODEL

The PEA uses the Conceptual Site Model (CSM) to develop a preliminary understanding of the site's potential risks to human health and the environment, and to assist in developing the sampling plan. The CSM presents information about site conditions and potential impacts to receptors, and may be updated as new information is obtained. The information can be provided in a schematic presentation as shown in Figure 2-1 or pictorially. The CSM should illustrate possible contaminant transport mechanisms and exposure pathways from various media that may be affected: air, soil, sediments, and water, including soil vapor, groundwater, and surface water. Information regarding the development of the CSM is available from a variety of sources including USEPA's most current version of the RI/FS guidance document<sup>6</sup>, the Triad Resource Center<sup>7</sup>, and the

<sup>6</sup> USEPA. 1988. *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*. EPA/540/G-89/004. OSWER Directive 9355.3-01. October.  
<https://semspub.epa.gov/work/HQ/100001529.pdf>

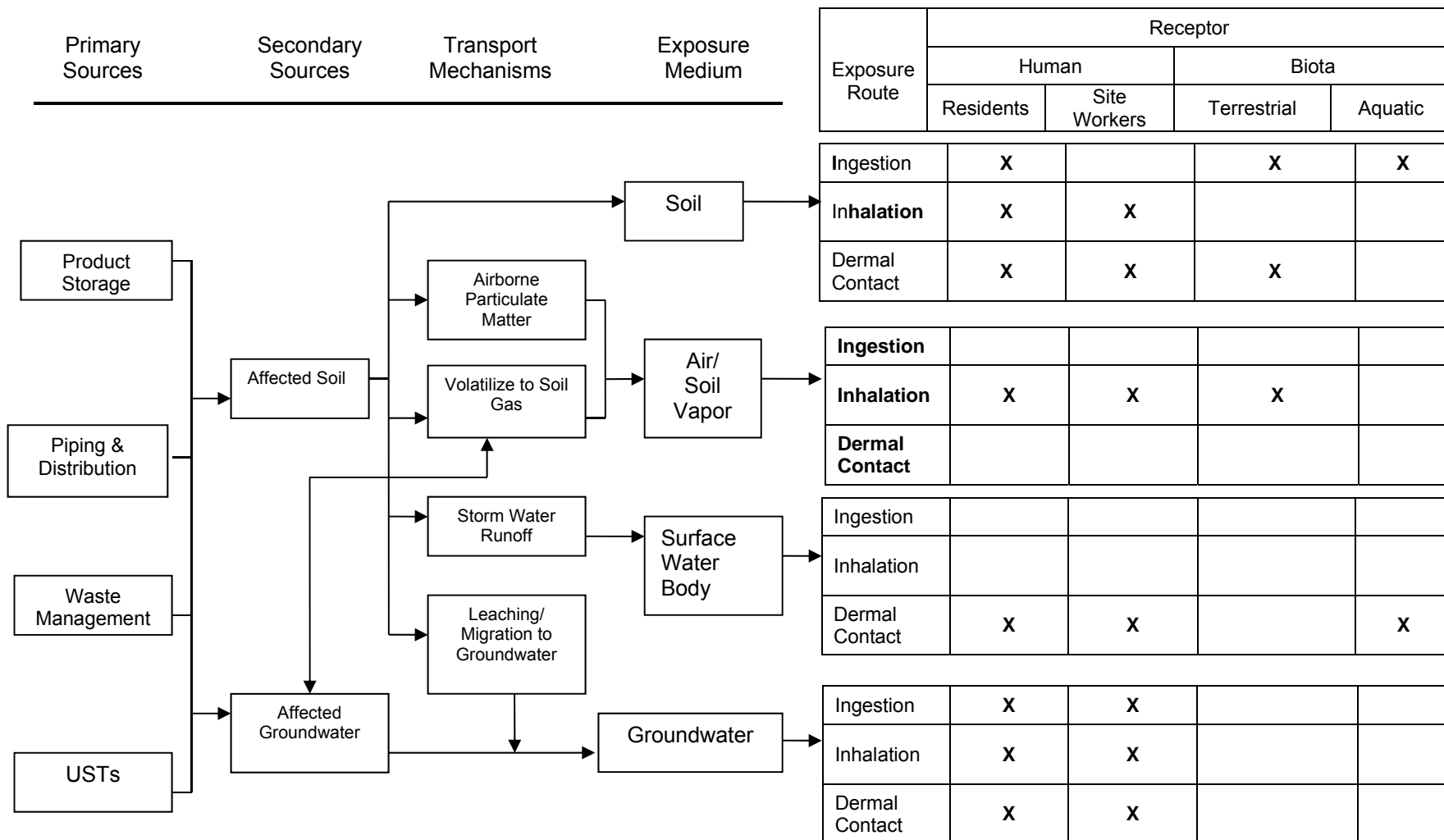
<sup>7</sup> Triad Resources Center Website: <http://www.triadcentral.org/>

most current version of Appendix A of DTSC's *Remediation of Metals in Soil*<sup>8</sup>. The Triad approach has expanded the CSM to include past use, previous investigations, geology and hydrogeology, intended reuse, decision criteria, potential remedies, and exit strategies, and these elements may be included in the CSM for a PEA, if appropriate.

---

<sup>8</sup> DTSC. 2008. *Proven Technologies and Remedies Guidance, Remediation of Metals in Soils, Appendix A1*. August 29. [https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/Guidance\\_Remediation-Soils.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/Guidance_Remediation-Soils.pdf)

**FIGURE 2- 1 EXAMPLE OF CONCEPTUAL SITE MODEL RECEPTOR NETWORK**





## 2.2 BACKGROUND RESEARCH

The purpose of the background research is to collect pertinent site information about the following:

- Site location, including legal description or easement;
- Regulatory status;
- Physical and environmental characteristics;
- Zoning, including any potential upcoming zoning or general plan changes;
- Current and past property uses and occupancies;
- Facility operations;
- Recorded environmental cleanup liens;
- Chain of title documents;
- Current and past corrective actions and response activities undertaken to address past and on-going releases of hazardous substances/wastes/materials;
- Engineering controls;
- Institutional controls;
- Current and past uses of hazardous substances/materials;
- Hazardous substance/waste/material management practices;
- Land use in the immediate area that might influence onsite conditions; and
- Environmental permits, both current and past, such as waste discharge requirements (WDR), National Pollution Discharge Elimination System (NPDES) permits, air quality management district permits, local permits, wastewater discharge permits, etc.

The Environmental Professional conducting the historical site search may exercise professional judgment as to how far back in time it is necessary to search historical records. Generally, the historical documents and records reviewed should cover a period of time as far back in the history of the property as it can be shown that the property contained structures or from the time the property was first used for residential, agricultural, commercial, industrial, or governmental purposes. At sites where information of past operations is limited, the type of operation known to have been conducted and any standard business or manufacturing practices applicable to operations of that kind and period should be researched. If there are data gaps in the information developed that

affects the ability of the person conducting the PEA to identify conditions indicative of releases or threatened releases, the Environmental Professional should identify the data gaps, identify the sources of information consulted to address the data gaps, and comment on the significance of the data gaps with regard to the ability to identify conditions indicative of releases or threatened releases on, at, in or to the property.

Complete and accurate site information is essential for determining the apparent problem, the potential exposure pathways and receptors, and the sampling needs for the PEA investigation. Records reviews, interviews, and site inspections should be conducted to complete this information-gathering phase of the PEA investigation. The specific information to be collected during these activities is outlined in Sections 3.2.3 Site Description, and 3.2.4 Background. The following sections provide guidance for completing these activities.

### 2.2.1 RECORDS REVIEW

This section provides potential data sources for the information requested to complete the background research for the PEA. Not all of the sources listed need be explored for each PEA. Reverse address and/or telephone directories, such as the Criss Cross Directory containing area-wide listings arranged by street address and phone number may be a useful resource. The review should begin with sources most likely to contain information on a given site. If conducting an AAI, searches and reviews for recorded environmental cleanup liens and reviews of government records must be conducted or updated within 180 days of and prior to the date of acquisition of the subject property.

- 1) **Agency Files:** The preparation of a complete history of onsite operations requires the review of all appropriate regulatory agency files. These files often provide documentation of releases and usually contain information not available in site records. If the information is not available on-line, then each agency should be contacted by telephone prior to making a visit to review files. Appointments are often necessary and fees may be charged for copying.
  - a) **DTSC, Regional Office** for inspection results, permits, previous removal or cleanup activities. DTSC's EnviroStor Data Base<sup>9</sup> can also be reviewed on-line to obtain information on permitted facilities, environmental investigation and cleanup projects.
  - b) **USEPA** for inspection results, permits, listing on the Federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS), National Priorities List (NPL), Emergency Response Notification System (ERNS) records, Toxics Release Inventory (TRI) or Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) Facilities lists.
  - c) **RWQCB** for waste discharge permits, National Pollutant Discharge Elimination System (NPDES) permits, previous cleanup activities, landfill or solid waste

---

<sup>9</sup> DTSC EnviroStor Web Site. <http://www.envirostor.dtsc.ca.gov/public/>

disposal lists and state leaking or registered underground storage tank lists. The State Water Resources Control Board GeoTracker<sup>10</sup> data base is available online and includes information on leaking underground storage tank cleanup sites, land disposal sites, permitted underground storage tank facilities and other cleanup sites overseen by the State Water Board and RWQCBs. The Department of Resources Recycling and Recovery or the Local Enforcement Agency (LEA) may also have records concerning solid waste disposal.

- d) **County and Local Offices** including Environmental Health Department; Planning Department; Building and Safety Department; Certified Unified Program Agencies (CUPA); Public Works Department; Public Health Offices, Air Pollution Control Districts; County Agriculture Commissioner's Office; County Tax Assessor's Office for all pertinent records regarding the site.
  - e) **Local Fire Department** for records regarding emergency response activities, hazardous materials storage at the site, and hazardous materials business plans.
  - f) **California Secretary of State's Office** for information regarding corporate ownership, officers, etc.
  - g) Public health records such as the Agency for Toxic Substances and Disease Registry (ATSDR) public health assessment and consultations.
  - h) **Department of Water Resources** (DWR) for well completion diagrams and well logs and information for wells installed on-site and in the vicinity of the site. Logs of monitoring wells used for environmental purposes may also be available.
  - i) **Division of Oil, Gas & Geothermal Resources** (DOGGR) is the repository for oil, gas, and geothermal well information and publishes statistics on drilling, production, and injection. General information, technical report, and statewide maps with locations and status of all oil, gas and geothermal wells are also available.
- 2) **Site Owner/Operator Records:** Facility records may be the primary source for information on hazardous substance/waste/material management practices at the site. Owner/operator files may include such records as product purchase invoices; waste manifests or bill of lading; permits; material safety data sheets; safety plans, preparedness and prevention plans; spill prevention, countermeasure and control (SPCC) plans; as-built drawings and/or schematics depicting construction details of waste handling/storage and/or industrial process areas, etc. that will provide valuable information regarding chemical usage and waste/material types, quantities, and treatment, storage and disposal practices.
- 3) **Professional Trade Organizations:** These organizations will have information on manufacturing processes and common industry practices.

---

<sup>10</sup> State Water Resources Control Board GeoTracker Database. <http://geotracker.waterboards.ca.gov/>

- 4) **Maps and Photographs:** Maps, including electronic maps and photographs will be useful for establishing the physical setting of the site and identifying property uses at specified times.
- a) **USGS 7.5 Minute Topographic Maps** produced by the United States Geological Survey (USGS) provide a basis for establishing site location and topographic information.
  - b) **Aerial photographs** of areas encompassing the site may allow for identification of historical development or site activities.
  - c) **Photographs** may be available from private collections, libraries of local governments or colleges and universities, or historical societies that document historical site activities.
  - d) **Fire Insurance Maps** produced by private fire insurance map companies indicate uses of properties at specified dates.
  - e) **Sea Level** rise inundation maps, if applicable to site location.

Government records or databases should be reviewed for reported releases or threatened releases for nearby or adjoining properties. The record and database searches with their associated distances should include the following:

- NPL sites or tribal- and state-equivalent sites (one mile);
- State facilities subject to corrective action (one mile);
- Federally-registered, or state-permitted or registered, hazardous waste sites identified for investigation or remediation, such as sites enrolled in state and tribal voluntary cleanup programs and tribal-and state-listed Brownfields sites (one-half mile);
- Leaking underground storage tanks (one-half mile);

- Properties that previously were identified or regulated by a government entity due to environmental concerns at the property. Information that should be searched includes the following:
  - Delisted NPL sites (one-half mile);
  - Registries of publicly available lists of engineering controls (one-half mile);
  - Former CERCLIS sites with no further remedial action notices (one-half mile).
  - State small quantity and large quantity generators (adjoining properties);
  - Federally-permitted, tribal-permitted, or state-permitted (or registered) landfills and solid waste management facilities (one-half mile);
  - Registered storage tanks (adjoining properties); and
  - California Department of Fish and Wildlife (DFW) sites or other habitat areas where releases have occurred (one mile).

**BOX 2-1: EXAMPLES OF PHYSICAL FEATURES**

- Property boundaries and existing structures
- Locations and boundaries of all onsite operations (present and past)
- Foundations of former structures
- Storage tanks and storage areas (including “empty” drum storage)
- Odors
- Pools of liquid (including standing surface water)
- Electrical or hydraulic equipment known or likely to contain PCBs
- Unidentified substance containers
- Stained soil and pavement, corrosion, and degradation of floors and walls
- Drains and sumps
- Pits, ponds and lagoons
- Surface drainage pathways
- Stressed vegetation (from something other than insufficient water)
- Solid waste and waste water
- Unique geologic features
- Wells (including dry wells, irrigation wells, injection wells)
- Septic systems

The search distance from the property boundary for reviewing government records or databases may be modified based upon the professional judgement of the Environmental Professional. The rationale for the modification should be documented.

**2.2.2 SITE INSPECTION**

A site inspection is essential to document the physical setting of the site, verify information obtained from owner/operator and agency records, and/or obtain site specific information when no records are available. The site inspection should consist of a walk-through of known and potential exterior operations areas as well as the interiors of all structures. A visual inspection of areas where hazardous substances/materials may be or may have been used, stored, treated, handled, or disposed should be conducted. Quantities of hazardous substances/materials observed and potential releases should be documented. Box 2-1 contains examples of the specific physical features the observer should attempt to identify. Physical limitations to the on-site visual inspection should be noted.

In addition to the on-site inspection, a visual inspection of the adjoining properties is needed. This inspection may be conducted from the subject property line, public rights-of-way, or other vantage points (e.g., aerial photography), and include a visual inspection of areas where hazardous substances/materials may be or may have been stored, treated, handled or disposed. Observations of any locations where human or ecological receptors may exist and may be potentially affected by on-site contamination

moving off the property should also be noted. Any physical limitations related to the inspection of the adjacent properties should be noted.

Visual inspections of the property and of adjoining properties must be conducted or updated within 180 days of and prior to the date of acquisition of the subject property if performing an AAI.

### **2.2.3 INTERVIEWS**

Interviews with current or former property owners, operators, facility managers, employees, occupants and/or site neighbors (owners and/or occupants) are necessary to obtain information regarding uses and historical physical characteristics of the site. Often based upon personal experience, this information can provide greater insight as to how the facility may have operated or who may be gaining access to the site. These personal accounts may confirm information found in agency files and provide missing details about the site. In some cases the information obtained from interviews may differ or contradict that obtained from records reviews. In these instances additional research may be needed to determine which information is accurate. Notes taken during interviews may be used as reference documents.

Telephone interviews may also be conducted with State and local agencies to obtain information not readily available through file review, including drinking water supplies, well locations, population served, and aquifer information.

For AAIs, interviews with past and present owners, operators, and occupants must be conducted or updated within 180 days of and prior to the date of acquisition of the subject property.

## **2.3 PUBLIC PARTICIPATION**

Public participation is an integral component of the cleanup process. DTSC's formal Public Participation Program establishes the mechanism for initiating and maintaining two-way communication between the community affected by a contaminated site and the regulatory agencies responsible for site investigation and cleanup. Public participation is essential at any site where chemicals in soils or groundwater may volatilize and intrude to indoor air. Solicitation of community concerns, suggestions, and comments throughout the cleanup process allows DTSC to make more informed decisions and reduces the potential for delays that might arise if the community objects to or does not understand an action or decision. It is DTSC's policy that public participation activities be initiated from the onset of a project and continues throughout the entire cleanup process. DTSC's current version of the *Public Participation Policy and Procedures Manual*<sup>11</sup>, which describes public participation requirements and other activities during the investigation and cleanup of sites, and the current version of the *Vapor Intrusion Public Participation*

---

<sup>11</sup> DTSC. 2001. *Public Participation Manual*. Revised, October.

<https://dtsc.ca.gov/get-involved/policies-procedures-public-participation-program/>

*Advisory*<sup>12</sup>, which discusses the public participation issues arising when indoor air may be contaminated by vapors coming from the sub-surface, are available on DTSC's web site.

During the PEA, development and distribution of a work notice describing field work may be necessary if the investigation is near a sensitive receptor or in a residential area. The mailing list should consist of known interested parties/agencies, contiguous property owners and occupants. If it becomes clear during the PEA that the site will require additional steps beyond the PEA phase, or if there is high community interest, the DTSC Public Participation Specialist should be contacted to determine if additional community outreach, (e.g., additional noticing at or near the site, etc.), is needed. If a Land Use Covenant may be implemented during the PEA phase as a final remedy, the DTSC Public Participation Specialist will prepare an abbreviated community profile, and develop a public notice and fact sheet announcing a public comment period for the remedy.

## **2.4 DATA COLLECTION AND EVALUATION**

This section deals with collecting samples from the field and evaluating the quality of the data collected. The Environmental Professional conducting the PEA should meet with the DTSC project manager and technical support staff, as appropriate; to review background information collected and discuss the need for additional sampling and a sampling strategy for the site. The Environmental Professional should submit a proposed work plan to DTSC for review and approval. Upon approval, the samples are collected and analyzed, and the resulting data are evaluated by the Environmental Professional and submitted to DTSC for review. Once the sampling and quality objectives are met, the data are ready for use in the screening evaluation (Section 2.5) and preparation of the PEA report.

The scope and type of field sampling will vary depending upon the site history and the nature of the release of hazardous substances/materials. If sampling has been conducted in the past, the results and related information needs to be reported and evaluated as part of the PEA. Additional sampling activities may be needed as part of the PEA investigation unless prior sampling data are of sufficient quality and quantity to fulfill the PEA requirements and objectives. Past sampling activities conducted without DTSC oversight will need to be reviewed by a DTSC project manager to evaluate the adequacy of the data for use in the PEA investigation.

### **2.4.1 WORK PLAN PREPARATION**

The work plan with an associated health and safety plan (HASP) should include all information necessary for implementing field work. A generic sampling plan table of contents is included as Table 2-1. DTSC has developed various Proven Technologies

<sup>12</sup> DTSC. 2012. *Vapor Intrusion Public Participation Advisory*. Final. March.  
[https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/VIPPA\\_Final\\_03\\_05\\_12.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/VIPPA_Final_03_05_12.pdf)

and Remedies Documents<sup>13</sup> that contain generic field sampling plans that the Environmental Professional may wish to review and use if appropriate when preparing the PEA work plan. The following points should be addressed in the sampling plan:

- 1) **Introduction, Site Background, and Description:** Provide the scope and purpose of the work plan, a history and site description relevant to sampling which identifies past activities that may have resulted in the contamination and the location and possible extent of the original release(s). The plan should also include other relevant site information such as site location, topography, hydrology, climate conditions and past sampling information. Maps should be presented that show the site in relation to its surroundings and identify site-specific features. The plan should also include a map(s) dedicated to identifying all sampling points, contamination sources, surface water and general groundwater flow directions, and site boundaries.
- 2) **CSM and Data Quality Objectives (DQOs) Process:** Provide a description of the CSM in text and/or figures. Identify the type, quality, and quantity of data that are needed and the intended use of the data based on the CSM and through the DQO process. More information on the DQO process can be found at the USEPA's Triad website and various USEPA quality assurance and quality control documents.
- 3) **Rationale for Sampling Strategy:** As part of the DQO process, provide the reason for choosing the locations, depths, types of sample matrices, number of samples (including quality assurance/quality control samples), analytical parameters, such as target analytes, detection limits and field screening methods. Any statistical approach used to select the locations should be explained.
- 4) **Sampling Methods:** Include step-by-step procedures and/or standard operating procedures describing how each sample will be collected for each matrix type and sampling technique. Any special methods to prevent losses of volatile or unstable compounds, such as, USEPA Method 5035 for collecting soil samples for volatile compound analysis, should be described. All equipment used to obtain samples and number and type of field quality controls should be identified.
- 5) **Sample Containers and Preservation:** Show analytical methods, types and volume of containers and preservation methods to be used for the different matrices in a table. Describe the type of pre-cleaning method used for the containers or provide a reference.
- 6) **Sample Packaging and Shipment:** Describe the methods for packaging, labeling, marking and shipping the samples.
- 7) **Sample Documentation:** Provide a description of the sample label with an example. A unique numbering system that positively identifies each sample and does not

<sup>13</sup> Proven Technologies & Remedies Documents resources page. DTSC Web site.

<https://dtsc.ca.gov/proven-technologies-remedies-documents/>



distinguish the quality assurance and quality control (QA/QC) samples from other samples should be described.

- 8) **Record Keeping:** Discuss field documentation including field logs (log book, drilling logs etc.), photographs, and quality control checklist or logs, and chain of custody forms and seals. The specific types of entries to be made in the various logs should be stated.

## TABLE 2- 1 GENERIC FIELD SAMPLING WORK PLAN TABLE OF CONTENTS

- 1.0 Introduction
- 2.0 Project Background
  - 2.1 Scope and Purpose
  - 2.2 Site Description
  - 2.3 Site History
  - 2.4 Other Site Information
- 3.0 Scope and Objectives
  - 3.1 Conceptual Site Model
  - 3.2 Data Quality Objectives
  - 3.3 Sampling Strategy
  - 3.4 Sample Analysis Summary
  - 3.5 Field Activities
- 4.0 Field Operations
  - 4.1 Sampling Methods
  - 4.2 Surveying
  - 4.3 Decontamination
  - 4.4 Waste Management
  - 4.5 Sample Handling
    - 4.5.1 Sample Containers
    - 4.5.2 Sample Volumes, Preservation Requirements
    - 4.5.3 Sample Identification
      - 4.5.3.1 Sample Numbering
      - 4.5.3.2 Sample Labeling
    - 4.5.4 Packaging and Shipping
    - 4.5.5 Field Quality Control
      - 4.5.5.1 Ambient Blank
      - 4.5.5.2 Equipment Blank
      - 4.5.5.3 Field Duplicates
      - 4.5.5.4 Field Replicates
    - 4.5.6 Sample Custody
    - 4.5.7 Background Samples
  - 4.6 Field Measurements
    - 4.6.1 Equipment Calibration and Quality Control
    - 4.6.2 Equipment Maintenance and Decontamination
    - 4.6.3 Field Monitoring Measurements
- 5.0 Record Keeping
  - 5.1 Chain of Custody Form
  - 5.2 Field Notes, Photograph Log

Figures

Tables

Appendices

## 2.4.2 SAMPLING STRATEGY

The first objective of sampling during the PEA is to provide analytical data of known quality to identify the contaminants at the site. These data are used in the PEA screening evaluation to estimate the risk to public health and the environment. The highest concentrations of each contaminant detected onsite should be used to estimate the site's potential threat. The sampling strategy should ensure that locations which would likely contain the highest contaminant concentrations will be sampled.

The second objective of sampling is to determine the general extent of contamination in order to assess immediate potential threats, scope of removal and remediation needs. Sufficient information should be gathered from the sampling to determine: 1) the need for expedited response actions such as restricting site access; and 2) the areas of the site with highest levels of contamination.

The degree to which the sampling strategy includes surface soils, subsurface soils, groundwater, surface water, soil vapor, and air is based on past chemical handling practices, available analytical data, suspected contamination sources, probable migration routes, and potential exposure pathways identified in the CSM (Section 2.1.2). Expectations regarding the extent of the investigation should be discussed with the DTSC project manager. Overall, the investigation should be performed in a manner that will determine the nature of the contaminants, their general distribution in the environment, and their potential to migrate.

The goal of the sampling should be to gather sufficient data to complete a PEA. The sampling can occur in one event or can be addressed in a phased approach, depending on the information known prior to sampling and the specific goals of each investigation event. However, if it becomes apparent during the sampling phase that a field investigation beyond the scope of a PEA is needed, a meeting with the DTSC project manager should be held to determine whether the site should progress into the next steps of the cleanup process. In that case, the PEA is concluded with a recommendation for further investigation and/or remediation.

Sites with little known and suspected contamination may require only one sampling event to gather sufficient information to address the objectives. A phased approach may be desired at sites with suspected contamination. In a phased approach, the first step may be to determine the nature and general extent of soil contamination prior to determining the need for a groundwater investigation, soil vapor sampling, surface water sampling and/or air monitoring. The Environmental Professional and DTSC staff should explore the most cost-effective approaches to collecting the required information while maintaining the scientific integrity of the investigation.

Geologic or engineering plans, specifications, drawings, and reports must be prepared by, or under the direct supervision of a California-licensed professional geologist or civil engineer, as appropriate, who will review and sign all such documents indicating responsibility for their content.

### 2.4.2.1 SOIL SAMPLING (VADOSE ZONE)

The primary strategies used during the PEA to determine soil sampling locations are authoritative and systematic random sampling. Authoritative or "biased" sampling can be used to detect the highest concentrations of each contaminant and the general extent of contamination at sites where potential release locations are known. In this strategy, the person collecting the samples selects the sampling locations and depths using personal judgment, generally in areas where the highest concentrations of contaminants are suspected. Systematic random sampling can be used to determine the location and general extent of contamination at sites where the area of release is not well known. Systematic random sampling involves the collection of samples at predetermined, regular intervals on a grid placed over an area potentially impacted by a release. See the most current version of Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (USEPA SW-846<sup>14</sup>) for more detail on sampling strategies. In either case, the selection of sample locations, number of samples collected, and sample depths need to meet the goals of the DQO process.

For PEA screening risk evaluations, surface soil sampling at zero to 6 inches below ground surface may be necessary, since exposure to contaminants in surface soil is a likely possibility. The depth of all soil sample data for use in the human and ecological risk evaluations should be specified in the DQO process. Surface and subsurface soil sampling should address the horizontal extent of contamination.

Sufficient subsurface soil samples should be collected to determine whether a release has occurred, to assess the vertical and horizontal extent of contamination, and to determine if there is a potential impact to groundwater. Or the PEA investigation should provide sufficient data showing that there are no potential impacts to soil or groundwater. The maximum depth of sampling will depend on the potential for migration of the contaminants through soil. Individual sample depths should be based on site-specific lithology. Continuously cored boreholes should be installed to the anticipated depth of sampling at suspected locations of contamination. The continuous cores should be logged and described, as recommended in the most current version of guidance on drilling, logging, and sampling published by DTSC<sup>15</sup>. Contacts between fine- and coarse-grained sedimentary units should be defined. Samples for analysis should be collected from fine-grained sediments occurring immediately adjacent to contacts with coarse-grained units. In the vadose zone (i.e. above the water table), fine-grained materials may act as avenues for contaminant migration and/or may retard or restrict the downward migration of contamination if it is moving by semi-saturated (or saturated) flow. Sampling locations should also be targeted at depths where information collected from direct reading instruments and physical observations indicate contamination may exist.

---

<sup>14</sup> SW-846 resources page. US EPA Web site. <https://www.epa.gov/hw-sw846>

<sup>15</sup> Cal/EPA. 2013. *Drilling, Logging, and Sampling at Contaminated Sites*, DTSC, June.

[https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Drilling\\_Logging\\_Sampling\\_Cont\\_Sites.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Drilling_Logging_Sampling_Cont_Sites.pdf)

The samples collected and analyzed for the PEA should be discrete samples at most sites. Composited sampling may not allow the identification of localized contaminated areas or 'hot spots' and is generally not recommended during the PEA. However, composite sampling or incremental sampling can be approved by DTSC in advance for specific purposes, if such sampling is appropriate for site conditions.

Soil matrix sample results should be reported on a dry weight basis, if they will be compared to screening values that assume dry weight concentrations, such as the USEPA Regional Screening Levels (RSLs) for non-VOCs.

#### **2.4.2.2 SOIL VAPOR SAMPLING**

DTSC has determined that, at sites where volatile organic compounds (VOCs) are suspected, soil vapor (or soil gas) sampling is the method of choice for evaluating inhalation exposure. Both soil vapor and soil matrix sampling are usually necessary for indicating the presence and general extent of VOC soil contamination, and the potential for groundwater contamination. See the most recent version of Cal/EPA's *Active Soil Gas Investigation Advisory*<sup>16</sup> for collection of soil gas and *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*<sup>17</sup> for soil gas sampling directly under building foundations.

#### **2.4.2.3 GROUNDWATER SAMPLING**

The determination of whether groundwater sampling is necessary at the site, including construction of monitoring wells, should be based on the CSM, as discussed in Section 2.1.2. Groundwater sampling should be performed at the site if any of the following conditions exist:

- Previous sampling data indicate groundwater is contaminated;
- Historical operations at the site indicate a potential for groundwater contamination due to quantity and/or types of chemicals released and the permeability of onsite soils; or
- Soil and/or soil gas data indicate the potential for groundwater contamination.

Grab groundwater samples may be collected to determine whether groundwater is affected by site operations as a more time efficient and cost effective sampling strategy. However, relative gradient and flow measurements cannot be obtained without fixed elevation data. The need to install permanent groundwater monitoring wells and the number of wells needed should be discussed with the DTSC project manager. The purpose of monitoring wells is to determine whether groundwater is affected by migration of contaminants and to establish the direction of groundwater flow. In addition to

---

<sup>16</sup> Cal/EPA. 2015. *Advisory, Soil Gas Investigations*. July. [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/VI\\_ActiveSoilGasAdvisory\\_FINAL.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/VI_ActiveSoilGasAdvisory_FINAL.pdf)

<sup>17</sup> DTSC. 2011. *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*. October. <https://dtsc.ca.gov/vapor-intrusion/>

sampling for suspected contaminants, monitoring wells may also be sampled for water quality parameters and water levels to evaluate water surface fluctuations and obtain groundwater elevation data not biased by short term aberrations, seasonal fluctuations, or off-site intermittent well pumping. These measurements may be used to construct water surface contour maps, calculate gradients, and identify flow direction.

If it is decided that monitoring wells are needed, the design of monitoring wells should be based on the hydrogeology of the site and the types of contaminants that are present. The first wells installed at a site are usually screened across the water table, assuming that contaminants migrating from the site would be detected in the shallowest groundwater. If data from the initial wells indicate the need for more wells or the need for wells in deeper water-bearing zones, this may indicate that the investigation is exceeding the scope of the PEA and the DTSC project manager should be contacted to determine if the project should proceed into the next phases of the cleanup process. In that case, the PEA should be concluded with a recommendation for further investigation and/or remediation.

DTSC's Site Cleanup web site should be consulted for the most current guidance manuals on groundwater investigations<sup>18</sup>; however, site-specific guidelines for the groundwater monitoring program should be developed in conjunction with DTSC staff.

If initial monitoring results exceed the groundwater screening values identified in the PEA work plan, the PEA is concluded with a recommendation for further investigation and/or remediation. If there is uncertainty about the sampling results, the DTSC project manager should be consulted to determine whether additional sampling as part of the PEA would be appropriate to resolve the issue.

#### **2.4.2.4 SURFACE WATER SAMPLING**

Surface water bodies that pass through or border the site and have a potential to be affected by the contamination may need to be sampled. Regulatory personnel capable of evaluating ecological risks should be consulted to determine if sampling is needed and to ensure that the proper sampling methods, locations and analytical methods are used. In general, water and sediment samples should be taken to determine the up-gradient and down-gradient concentrations of chemicals. The methods used to collect sediment or water samples should be based on the type of contaminants, type of water body, flow rate and other physical features. Sediment samples should be collected from locations where the potential exists for insoluble or slightly soluble contaminants to settle. Samples should be collected from various locations along the runoff course that leads from the contamination to the water body; at the point where the runoff course enters the water body; up-gradient from that point; and down-gradient from that point. This sampling may be delayed and incorporated into future sampling events if the PEA recommends that further assessment is required, and the DTSC project manager agrees to delay the sampling.

<sup>18</sup> Guidance Manuals for Groundwater Investigations, DTSC Web site.  
<https://dtsc.ca.gov/advisories-guidance/>

General guidance on surface water sampling is available from the USEPA, the Surface Water Ambient Monitoring Program (SWAMP) of the California State Water Resources Control Board (SWRCB), and the USGS National Water Quality Assessment Program (NAWQA) Protocol for Collecting and Processing Stream Water Samples.<sup>19</sup>

#### **2.4.2.5 INDOOR AIR SAMPLING**

The PEA determines the risk from VOCs via the inhalation pathway by using the maximum contaminant concentrations in soil vapor to estimate potential concentrations in indoor air. This approach is described in Section 2.5.4.5.3. Occasionally, indoor air sampling may be done within the context of a PEA to determine, for example, if evacuation is warranted. Indications that evacuation should be considered include: the presence of odors, physiological effects, wet basements, and/or flammable or explosive conditions. Outdoor or ambient air monitoring data are not necessary for use in a PEA screening risk evaluation, as VOC levels in outdoor air emanating from a site would be quite low because of dilution with atmospheric air compared to estimated VOC levels in a confined indoor air space. However, outdoor air monitoring can provide a synoptic estimation of air concentrations, and therefore may be useful for worker health and safety monitoring, or monitoring during removal actions with adequate background air monitoring.

Guidance on indoor air sampling and evaluating the intrusion of soil vapors into indoor air, including evaluation for acute hazards within an existing building is available in the most current version of DTSC's *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*<sup>20</sup>

#### **2.4.2.6 BACKGROUND SAMPLING**

Background samples are collected to distinguish between site-related contamination and naturally occurring or anthropogenic contaminant levels. In general, the use of regional background levels for comparison to site contamination is not acceptable. Background samples should be collected for each medium (e.g. water, soil or air) being investigated at or near the site but not in areas likely to be influenced by the contamination and/or facility operations (past or present). Background samples should be collected from locations that are upgradient/ upstream of the suspected contamination. It may be difficult to obtain true background samples in highly urban, industrialized areas because of commingled plumes, etc. In such cases, consultation with DTSC staff may be necessary.

Background samples should be analyzed for naturally occurring chemicals. With few exceptions, background levels for manmade chemicals are zero. The few exceptions

<sup>19</sup> USEPA. <https://www.epa.gov/quality/field-sampling-procedures-region-9>; Surface Water Ambient Monitoring Program (SWAMP) WRCB web site. [http://www.waterboards.ca.gov/water\\_issues/programs/swamp/tools.html](http://www.waterboards.ca.gov/water_issues/programs/swamp/tools.html); USGS NAWQA Protocol. <http://water.usgs.gov/nawqa/pnsp/pubs/ofr94-455/sw-t.html>

<sup>20</sup> DTSC. 2011. *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*. October. <http://www.dtsc.ca.gov/vapor-intrusion/>

may arise when an off-site source has contributed to the onsite contamination, the site is part of a regional contamination problem, or the site-related contaminants are the same as certain ubiquitous, manmade chemicals, such as dioxins/furans and polycyclic aromatic hydrocarbons (PAHs).

It is unlikely that a sufficient number of background samples will be collected during the PEA investigation to be considered statistically valid. However, the information is useful in comparing relative ranges of background results to onsite contamination. If chemicals of potential concern (COPCs) include metals that are also naturally occurring in soil, background samples should be collected from a minimum of ten locations to determine the average contaminant concentration that is not a result of releases from the site. Background samples at each location should be collected from strata similar to onsite samples to which they will be compared. If initial sampling reveals a high variability between levels in each sample, more samples should be collected to increase the confidence in the average.

More information on background soil sampling is provided in the most current versions of *Appendix B – Strategies for Establishing and Using Background estimates of Metals in Soil* in DTSC’s *Proven Technologies and Remedies Guidance – Remediation of Metals in Soil*<sup>21</sup>, DTSC’s *Selecting Inorganic Constituents as Chemicals of Potential Concern at Risk Assessments at Hazardous Waste Sites and Permitted Facilities*<sup>22</sup> and DTSC’s *Final Report Background Metals at Los Angeles Unified School Sites – Arsenic*<sup>23</sup>.

### 2.4.3 QUALITY ASSURANCE AND QUALITY CONTROL MEASURES

The sampling strategy for the site should include quality assurance and quality control (QA/QC) measures to be implemented as part of the sampling and analytical procedures. The purpose of these measures is to produce data of a known quality. These QA/QC measures are established to monitor both field and laboratory procedures. QA/QC procedures specifically for the collection of soil gas can be found in the most current version of the *Advisory - Active Soil Gas Investigation*<sup>24</sup> (Cal/EPA, 2015).

To check the precision and accuracy of field data, QA/QC samples should be collected for analysis. Field QC samples consist primarily of co-located samples, split replicates, travel blanks, equipment blanks, and field blanks. Field QC and site samples should be collected, stored, transported, and analyzed in the same manner. Table 2-2 provides the

<sup>21</sup> DTSC. 2008. *Appendix B – Strategies for Establishing and Using Background Estimates of Metals in Soil, Proven Technologies and Remedies Guidance – Remediation of Metals in Soil*. August 29. [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/Appdx\\_B\\_083108.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/Appdx_B_083108.pdf)

<sup>22</sup> DTSC. 1997. *Selecting Inorganic Constituents as Chemicals of Potential Concern at Risk Assessments at Hazardous Waste Sites and Permitted Facilities*. February. <https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/backgrnd.pdf>

<sup>23</sup> DTSC. 2005. *Final Report Background Metals at Los Angeles Unified School Sites – ARSENIC*. June 6. [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/Background\\_Arsenic.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/Background_Arsenic.pdf)

<sup>24</sup> Cal/EPA. 2015. *Advisory – Active Soil Gas Investigation*. July. <https://dtsc.ca.gov/vapor-intrusion/>



minimum field QA/QC sample requirements for each medium. Samples for QA/QC purposes should be collected from areas not likely to be highly contaminated.

In addition to samples listed in Table 2-2, QA/QC measures can be employed throughout the sample collection to improve the quality of the results. When selecting devices to collect, store, preserve, and transport the samples, consider the effect the device may have on the integrity of the samples. The devices should not alter the samples so as to be reactive, promote adsorption, leach analytes, or otherwise influence contaminant concentrations prior to analysis. Sample collection should also be performed in a manner that does not adversely affect the sample integrity. The collected samples need to be representative of existing site conditions, and influences due to the sampling and analysis procedures should be minimized. In order to evaluate any potential influences, persons conducting the sampling should document the manner in which samples are handled from the time of collection until final analysis using chain of custody procedures.

The State Certified laboratory performing the analysis should have its own internal QA/QC procedures. They include method blanks, surrogates, matrix spike and matrix spike duplicates, laboratory duplicates and initial and continuing calibration checks. These procedures will more than likely vary between laboratories.

**TABLE 2- 2 QUALITY ASSURANCE/QUALITY CONTROL SAMPLES**

Sample Type	Ratios
Co-located replicates	5% of total # of samples
Split replicates	5% of total # of samples
Travel blanks	1 per sample shipment (volatiles)
Equipment blanks	1 per field decontamination event (as needed)
Field blanks	1 per sampling day

A current list of State Certified laboratories is available from the Department of State Water Resources Control Board Environmental Laboratory Accreditation Program web site<sup>25</sup>.

#### **2.4.4 ADDITIONAL REGULATORY REQUIREMENTS**

DTSC will provide oversight for the preparation and implementation of the majority of the work required to complete the PEA. However, in doing so, DTSC does not relieve the responsible person(s) from liability for compliance with all other applicable laws and regulations. The PEA must be conducted in compliance with all applicable Federal, State and local requirements including, but not limited to requirements to obtain permits and to ensure worker safety.

<sup>25</sup> Environmental Laboratory Accreditation Program (ELAP) resources page. California Department of Public Health Web site. [http://www.waterboards.ca.gov/drinking\\_water/certlic/labs](http://www.waterboards.ca.gov/drinking_water/certlic/labs)

Some examples of other regulatory requirements whose applicability should be investigated prior to initiation of PEA sampling activities include:

- County or local oversight program (LOP) agency requirements for drilling permits for installation and destruction of borings and wells. The drilling must be conducted by a C-57 licensed driller, and Well Completion Reports signed by the driller must be submitted to the Department of Water Resources (DWR) for each boring; other specific county or LOP reporting requirements may apply.
- Department of Transportation (DOT) requirements for transporting hazardous materials; and requirements set forth in Title 22, California Code of Regulations, for manifesting and transporting hazardous waste generated by the investigation;
- Air Pollution Control District permit requirements for air emissions (e.g. from stockpiles of soils contaminated with volatile chemicals and for emissions during excavation);
- RWQCB and local agency requirements for protection of stormwater, surface water and ground water quality;
- Occupational Safety and Health Administration (OSHA) requirements for worker safety (29 CFR §1910.120 and 8 CCR §5192). The site health and safety plan should be provided to DTSC prior to the start of field work;
- Land disposal restrictions for wastes/contaminated soils transported for disposal;
- California Department of Fish & Wildlife (DFW) requirements for identification and management of threatened or endangered species and habitats.
- Local requirements for noise, dust control, and vehicular ingress/egress from properties under investigation;
- Permits to perform intrusive investigation into public easements and right-of-ways; and,
- Underground Service Alert (USA) for on-site locations of pipelines, utilities<sup>26</sup>

#### **2.4.5 DATA EVALUATION**

The PEA investigation usually requires the collection of a variety of data for a number of different purposes. Data collected can range from field monitoring data for health and

<sup>26</sup> USA North 811, Call 811 Before You Dig, California Excavation Law. <http://usanorth811.org/>

safety precautions to laboratory analyses measuring contaminant levels. Each sample collected may have been analyzed for a number of different chemicals, depending upon the rationale for the sample. However, not all of the chemicals detected will be attributable to an onsite release and not all of the data are guaranteed to be of an acceptable quality. The purpose of the data evaluation is to determine which of the chemicals identified are likely to be site-related and to assess whether the reported concentrations for these chemicals are of acceptable quality for use in the screening evaluation. Much of the information in the following sections was excerpted from USEPA's *Risk Assessment Guidance for Superfund, Volume 1 Human Health Evaluation Manual (Part A)*<sup>27</sup>.

#### 2.4.5.1 EVALUATION OF ANALYTICAL METHODS

Not all of the data collected during the field investigation are appropriate for use in the screening evaluation. Analytical results that are not specific for a particular compound or results of insensitive analytical methods (e.g., portable field instruments) generally are not appropriate for screening risk evaluation. Table 2-3 provides examples of the types of analytical techniques and data that could potentially be unsuitable for use in the screening evaluation. However, these types of results may be useful when considering sources of contamination, potential fate and transport of contaminants, or qualitative discussions of risk. In addition, the results of analytical methods associated with unknown, few, or no QA/QC procedures should be eliminated from further quantitative use.

**TABLE 2- 3 EXAMPLES OF POTENTIALLY UNSUITABLE ANALYTICAL TECHNIQUES**

Analytical Instrument or Method	Purpose of Analysis	Analytical Result
Photoionization Detector (PID)	Health and Safety, Field Screen	Ionizable Organic Vapor
Organic Vapor Analyzer (OVA)	Health and Safety, Field Screen	Total Organic Vapor
Combustible Gas Indicator with O <sub>2</sub> meter (CGI)	Health and Safety	Combustible Vapors, Oxygen-deficient Atmosphere
Field Gas Chromatography (GC)	Field Screen/ Analytical Method	Specific Volatile and Semi-volatile Organic Chemicals

<sup>27</sup> USEPA. 1989. *Risk Assessment Guidance for Superfund, Volume 1 Human Health Evaluation Manual (Part A)*. December. Web site. <http://www.epa.gov/oswer/riskassessment/ragsa/index.htm>

#### **2.4.5.2 EVALUATION OF REPORTING LIMITS**

Before eliminating chemicals because they are not detected, the following points should be considered:

- The reporting limit for a chemical may be greater than corresponding standards, criteria, or concentrations derived from toxicity reference values, such as, USEPA Regional Screening Levels (RSLs) or other applicable risk-based screening values agreed upon by the project manager and DTSC toxicologist. Therefore, the chemical may be present at levels greater than these corresponding reference concentrations, which may result in undetected risk.
- A particular reporting limit for a chemical may be significantly higher than positively detected values for that chemical in other samples in a data set.

After considering the above points and other reasons why contaminants may not have been detected, those chemicals that have not been detected in any medium may be eliminated. If information exists indicating that the chemicals are present, they should not be eliminated. For example, if chemicals with similar fate and transport characteristics are detected frequently in soil, and some of these chemicals are also detected frequently in groundwater while the others are not detected, then the undetected chemicals are probably present in the groundwater and additional sampling should be conducted to attempt to confirm their presence. The PEA report can identify the possibility of undetected contaminants and recommend the additional sampling for the contaminants as part of the RI/FS.

#### **2.4.5.3 EVALUATION OF QUALIFIED DATA**

For analytical results, various qualifiers pertaining to the quality of the data are attached to certain data by either the laboratories conducting the analysis or by persons conducting the data evaluation. The data evaluation process will determine if each qualified data point should be flagged as rejected, or determine and document that qualified data are valid and useable.

#### **2.4.5.4 EVALUATION OF BLANKS**

Analysis of blank samples provides a way to determine whether contamination has been introduced into a sample set either (1) in the field while the samples were being collected or transported to the laboratory or (2) in the laboratory during sample preparation and analysis. To prevent the inclusion of non-site-related contaminants in the screening evaluation, the concentrations of chemicals detected in blanks should be compared with concentrations of the same chemicals detected in site samples. Detailed definitions of

different types of blanks are provided in Chapter 5 of the *Risk Assessment Guidance for Superfund, Volume 1 Human Health Evaluation Manual (Part A)*<sup>28</sup>.

**Blanks containing common laboratory contaminants.** Acetone, 2-butanone (or methyl ethyl ketone), methylene chloride, toluene, and the phthalate esters are common laboratory contaminants<sup>29</sup>. If the blank contains detectable levels of common laboratory contaminants, then the sample results should be considered positive only if the concentrations in the sample exceed ten times the maximum amount detected in any blank. If the concentration of a common laboratory contaminant is less than ten times the concentration detected in the blank, then it may be concluded that the chemical was not detected in the particular sample and the blank-related concentrations of the chemical may be considered to be the quantitation limit for the chemical in that sample. If all samples contain levels of a common laboratory contaminant that are less than ten times the level of contamination noted in the blank, then that chemical may be eliminated from the screening evaluation. However, the analysis results should still be presented in the report with an explanation.

**Blanks containing chemicals that are not common laboratory contaminants.** If the blank contains detectable levels of one or more organic or inorganic chemicals that are not considered by the USEPA to be common laboratory contaminants, then site sample results should be considered positive only if the concentration of the chemical in the site sample exceeds five times the maximum amount detected in any blank. Samples containing less than five times the amount in any blank should be treated as non-detects, and the blank-related chemical concentration should be considered the quantitation limit for the chemical in that sample. Again, if all samples contain levels of a chemical that are less than five times the level of contamination noted in the blank, then that chemical may be eliminated from the screening evaluation. The analysis results should still be presented in the report with an explanation.

#### 2.4.5.5 EVALUATION OF TENTATIVELY IDENTIFIED COMPOUNDS

A tentatively identified compound (TIC) is a compound that can be seen by the analytical testing method, but its identity and concentration cannot be confirmed without further analytical investigation. The laboratory should report tentatively identified compounds (TICs). Two options for addressing TICs exist, depending on the relative number of TICs compared to non-TICs. When only a few TICs are present and there is no historical or site information suggesting that a particular TIC may be present, TICs may be excluded from a risk evaluation upon approval from DTSC. When many TICs are present, TIC concentrations appear elevated, or site information indicates that the TICs are present, further evaluation of TICs is necessary. A discussion of TICs is provided in

---

<sup>28</sup> USEPA. 1989. Risk Assessment Guidance for Superfund, Volume 1 Human Health Evaluation Manual (Part A). December. Web site. <http://www.epa.gov/oswer/riskassessment/ragsa/index.htm>

<sup>29</sup> Ibid.

Chapter 5 of USEPA's *Risk Assessment Guidance for Superfund Volume 1 Human Health Evaluation Manual (Part A)*<sup>30</sup>.

#### 2.4.5.6 COMPARISON OF SITE DATA WITH BACKGROUND

A comparison of site concentrations with background concentrations is useful for identifying the non-site-related chemicals that are found at or near the site. Metals present at levels equivalent to background can be eliminated as chemicals of potential concern (COPCs) and need not be considered in the screening evaluation; however, metals whose concentrations are above background should be included. Under no circumstances should background concentrations be subtracted from concentrations observed at the site. If background risk might be a concern, it should be calculated separately from site-related risk. The comparison process is as follows:

- If the maximum site metal concentration is less than the maximum background, the metal can be excluded as a COPC.
- If the mean site metal concentration is equal to or less than the mean local background metal concentration, the metal can be excluded as a COPC. Before carrying out this step, refer to the listed resources on background data sets to make sure those data sets are adequate.
- The site metal data set should be compared to the background metal data set. If there is good overlap of the site and background data sets, the metal can be excluded as a COPC.

More detailed discussion on comparing site data to local background data is provided in the most current version of *Appendix B – Strategies for Establishing and Using Background estimates of Metals in Soil in the Proven Technologies and Remedies Guidance – Remediation of Metals in Soil*<sup>31</sup>.

#### 2.4.5.7 IDENTIFICATION OF CHEMICALS OF POTENTIAL CONCERN

All chemicals that are not eliminated by any of the above evaluations should be considered COPCs for the site and should be evaluated further through the PEA screening evaluation. The Environmental Professional should work closely with DTSC staff when evaluating data that are thought to be non-site-related. DTSC approval should be received before a chemical is eliminated from evaluation through the human health and ecological screening risk evaluation described in the following section.

<sup>30</sup> USEPA. 1989. Risk Assessment Guidance for Superfund, Volume 1 Human Health Evaluation Manual (Part A). December. Web site. <http://www.epa.gov/oswer/riskassessment/ragsa/index.htm>

<sup>31</sup> DTSC. 2008. *Appendix B – Strategies for Establishing and Using Background estimates of Metals in Soil in the Proven Technologies and Remedies Guidance – Remediation of Metals in Soil*. August 29. [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/Appdx\\_B\\_083108.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/Appdx_B_083108.pdf)

## 2.5 HUMAN HEALTH SCREENING RISK EVALUATION

The purpose of a human health screening risk evaluation is to estimate the potential chronic human health risk/hazard from soil and groundwater contamination at the site. This screening evaluation is intended to be a health-conservative preliminary evaluation of potential risk and hazard and, therefore, assumes that the site will be used for residential purposes, the scenario that would result in the greatest exposure and risk. This screening evaluation will assist the project manager, in consultation with the rest of the project team, in deciding whether further site characterization, risk assessment, or remediation is necessary. The recommendations presented in this section are intended only for a human health screening risk evaluation. DTSC's Human and Ecological Risk Office (HERO) *Human Health Risk Assessment (HHRA) Note 4*<sup>32</sup> provides additional guidance on carrying out a screening level human health risk evaluation and is updated as needed. Recommendations for performing a quantitative human health risk assessment are beyond the scope of this PEA Guidance Manual.

The basic screening risk approach is to calculate the estimated risk or hazard posed by the maximum concentration of a chemical detected in each medium (soil, water, air) using an established human health-risk-based residential screening level/concentration as a comparator, that is, the USEPA Regional Screening Level (RSL)<sup>33</sup> for residential land use, modified as necessary by DTSC in HHRA Note 3<sup>34</sup>. The basic screening risk equations for each medium (soil, water, air) are as follows.

For a carcinogenic chemical: The screening concentration is based on a target cancer risk of one-in-a-million ( $10^{-6}$ ).

$$\frac{\text{Maximum concentration}}{\text{Screening concentration}} \times 10^{-6} = \text{Cancer Risk}$$

For a non-carcinogenic chemical: The screening concentration is based on a target Hazard Quotient (HQ) of one.

$$\frac{\text{Maximum concentration}}{\text{Screening concentration}} = \text{Hazard Quotient}$$

**SOIL.** Before using these RSLs or other risk-based generic screening levels agreed upon by the project manager and DTSC toxicologist, to conduct a human health screening risk evaluation, it is critical to examine the site-specific CSM to make sure that the exposure pathways and site conditions match those assumed in developing these RSLs. These generic screening concentrations are calculated by assuming exposure to soil via pathways most frequently encountered in a residential setting. Although health-

<sup>32</sup> DTSC Human Health Risk resources page contains HHRA Note 4. Web site <http://www.dtsc.ca.gov/assessingrisk/humanrisk2.cfm#Guidance>

<sup>33</sup> USEPA Regional Screening Levels (Formerly PRGS) Web site. <http://www.epa.gov/region9/superfund/prg/>

<sup>34</sup> DTSC Human Health Risk resources page contains HHRA Note 3. Web site <http://www.dtsc.ca.gov/assessingrisk/humanrisk2.cfm#Guidance>

conservative exposure input parameters are used, not all potential exposure pathways are included. For example, the ingestion of fruits and vegetables grown in backyard gardens located in contaminated soil or the inhalation of vapors from the sub-surface are not included as exposure pathways in the development of the RSLs. The sections below further discuss exposure pathways not included in RSLs.

**SOIL VAPOR.** The major exposure pathway for VOCs detected in soil vapor is the inhalation of vapors that have migrated indoors through diffusive and advective processes. In the absence of generic soil vapor screening levels, a method for performing a screening risk evaluation for VOCs detected in soil vapor is described in Section 2.5.4.5.3.

**GROUNDWATER.** The approach for the risk evaluation of chemical contaminants detected in groundwater assumes that groundwater may be used as a source of drinking water in a residential setting and compares the maximum groundwater concentration of a chemical to its tap water RSL. For constituents for which USEPA's tap water RSLs (or alternate screening levels recommended by DTSC) are not available, California Public Health Goals (PHGs) may be used<sup>35</sup>. Maximum Contaminant Levels (MCLs) should not be used in a screening risk evaluation, because they are not risk-based levels. However, since MCLs are commonly Applicable or Relevant and Appropriate Requirements (ARAR) in the cleanup program, they may be used as comparators as a potential requirement in a site cleanup.

If VOCs are detected in groundwater, groundwater should be further evaluated as a potential source of vapors that may intrude indoors with subsequent exposure by humans. Section 2.5.4.5.4 below describes an approach for calculating a screening risk from this pathway. The most current version of the *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*<sup>36</sup> should be consulted for recommended approaches.

## 2.5.1 HUMAN HEALTH SCREENING LEVELS

Various suites of human health screening levels/concentrations are described below. If a chemical identified as a chemical of potential concern (COPC) does not have a screening level, the PEA preparer should consult with the DTSC project manager and toxicologist to decide if the equations shown in Section 2.5.4 – Alternative Simplified Exposure and Risk Equations, are appropriate for use in the PEA.

**Regional Screening Levels (RSLs).** USEPA RSLs<sup>37</sup> are human-health-risk-based soil, air, or water concentrations developed by the USEPA for about 750 chemicals using toxicity criteria established or agreed upon by the USEPA and assuming residential land

<sup>35</sup> Office of Environmental Health Hazard Assessment. Web site. <http://www.oehha.ca.gov/>

<sup>36</sup> DTSC. 2011. *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*. October. <https://dtsc.ca.gov/vapor-intrusion/>

<sup>37</sup> USEPA Regional Screening Levels (Formerly PRGS). Web site. <http://www.epa.gov/region9/superfund/prg/>



and commercial/industrial land use. DTSC's Human and Ecological Risk Office (HERO) reviews the USEPA RSL list periodically and releases their recommendations in a *Human Health Risk Assessment (HHRA) Note 3*<sup>38</sup>. Both reference lists are updated periodically, and the most recent versions should be consulted when preparing a PEA.

It is imperative that RSLs be used with modifications as discussed in DTSC HHRA Note 3 so that the screening levels utilized are those specifically recommended by DTSC. For a limited number of constituents, DTSC HHRA Note 3 recommends use of alternate screening levels, other than the RSLs.

The limitations of the RSLs are discussed as follows. 1) The inhalation of VOCs intruding indoors from the sub-surface is not included as an exposure pathway in the soil RSLs. Thus, soil RSLs for VOCs cannot be used in a PEA screening evaluation to evaluate the indoor air pathway. Soil RSLs for VOCs may be used to evaluate soil ingestion and outdoor ambient air exposures. Since the inhalation of vapors intruding into indoor air is not included in the development of the soil RSLs, this exposure pathway must be evaluated separately, as discussed in Section 2.5.4.5.3. 2) RSLs do not consider ecological receptors. 3) The derivation of soil RSLs does not consider the potential for contaminants to migrate to groundwater or surface water from soil. However, the RSL Tables do list risk-based and MCL-based screening levels in soil (SSLs), representing chemical concentrations in soil that may affect the groundwater through leaching. The DTSC geologist and the RWQCB should be consulted regarding the protection of groundwater and surface water.

**Public Health Goals (PHGs).** PHGs are human health-risk-based water concentrations developed by the OEHHA for more than 80 chemicals assuming the use of the water as tap water. The list of PHGs is available at OEHHA's web site<sup>39</sup>. However, USEPA tap water RSLs are suggested for use as screening concentrations in a PEA screening risk evaluation, unless otherwise recommended in the DTSC HHRA Note 3.

**California Human Health Screening Levels (CHHSLs).** CHHSLs are soil or soil vapor concentrations developed by the Cal/EPA Office of Environmental Health Hazard Assessment (OEHHA) for about 60 chemicals using toxicity criteria primarily established by the OEHHA. This list was originally published in 2005 and last revised in 2010. CHHSLs are no longer generally recommended for use in a human health risk evaluation, because they are not routinely reviewed and revised as new scientific information becomes available.

**Environmental Screening Levels (ESLs).** ESLs are suites of screening concentrations developed by the SFBRWQCB for surface water, groundwater, soil and soil gas with different specific objectives<sup>40</sup>. Certain ESLs that have been calculated to be protective of human health in a residential setting may be acceptable for use in a PEA with the

---

<sup>38</sup> DTSC Human Health Risk Web site contains HERO Note 3.

<http://www.dtsc.ca.gov/AssessingRisk/humanrisk2.cfm#guidance>

<sup>39</sup> Office of Environmental Health Hazard Assessment. Web site. <http://www.oehha.ca.gov/>

<sup>40</sup> San Francisco Bay Regional Water Quality Control Board ESL – Environmental Screening Levels. Web site. [http://www.waterboards.ca.gov/rwqcb2/water\\_issues/programs/esl.shtml](http://www.waterboards.ca.gov/rwqcb2/water_issues/programs/esl.shtml)

approval of a DTSC toxicologist, because these ESLs have been developed with the same methodology as used to derive the RSLs and use parameter values recommended by DTSC. These ESLs are: Table E-2 Soil Gas Screening Levels - Residential Exposure; Table E-3 Ambient and Indoor Air Screening Levels - Residential Exposure; and, Table K-1 Direct Exposure Soil Screening Levels, Residential Exposure Scenario. This recommendation that certain ESLs may be used in a PEA is dependent on the ESLs continuing to be updated on a regular basis.

However, soil ESLs calculated with the objectives of protection of terrestrial biota, against nuisance conditions, or against leaching to groundwater should not be used as health risk screening levels in a PEA because the models used to derive these levels have not been formally reviewed and accepted by DTSC. In addition, nuisance conditions are not considered a health risk issue, and protection against leaching to groundwater is not generally a component of a PEA. ESLs based on ecological concerns, such as surface water habitats, are not recommended for use in the qualitative ecological screening evaluation that is included in a PEA.

## **2.5.2 SCREENING EVALUATION ASSUMPTIONS AND EXPOSURE FACTORS**

The parameters of the human health screening evaluation used to develop the USEPA RSLs are outlined in Section 2.5.2.1 below. These exposure parameters should be the same as those assumed for the site in a preliminary evaluation.

### **2.5.2.1 EXPOSURE PATHWAYS AND MEDIA OF EXPOSURE**

The exposure pathways used to develop the RSLs are those recommended by the USEPA to represent a reasonable maximum exposure (RME) in a residential setting at Superfund sites.

**SOIL.** The exposure pathways included in the calculation of RSLs for soil are: incidental ingestion of soil, dermal absorption of nonvolatile chemicals in soil, and inhalation of airborne dust and volatile chemicals in ambient air.

**GROUNDWATER.** The exposure pathways included in the calculation of RSLs for water assumed to be used as tap water are: ingestion from drinking, dermal exposure, and inhalation of volatile chemicals generated during household use (e.g. showering, dish washing).

**OTHER EXPOSURE PATHWAYS.** Other exposure pathways are possible under a residential scenario at a particular site as described below. But for a screening evaluation in which RSLs will be used as direct comparators, the pathways listed above are the only pathways considered complete.

- The ingestion of fruits and vegetables grown in backyard gardens located in contaminated soil **are not** included as an exposure pathway in the development of the RSLs, so if food chain contamination is suspected or is plausible, then RSLs should

not be used in a screening level evaluation, and a DTSC toxicologist should be consulted.

- The inhalation of vapors intruding into indoor air **is not** included as an exposure pathway in the development of the soil RSLs. Therefore, the vapor intrusion to indoor air pathway must be evaluated separately, if VOCs have been detected in soil vapor.
- The tap water RSLs **do not** include vapor intrusion to indoor air of VOCs present in groundwater. Nor do they include ingestion of water during swimming, nor transfer of chemicals in water to aquatic organisms, like fish, with subsequent ingestion by humans. It is the responsibility of the Environmental Professional, in consultation with the project manager and DTSC toxicologist, to determine whether additional exposure pathways should be considered.
- Early life exposure **is not** included as an adjustment for exposure to carcinogens in a PEA for the following reasons. First, age-dependent adjustment factors have been included in the RSLs for those chemicals considered mutagens. Second, the other conservative assumptions included in the PEA screening evaluation should be adequately protective for all potentially exposed populations.
- Exposure pathways associated with specific cultural or traditional practices **are not** included in the development of RSLs. If such pathways are plausible, then a DTSC toxicologist should be consulted for the appropriate approach.

### 2.5.2.2 LAND USE

For purposes of a PEA screening evaluation, the land use of the site is assumed to be residential, regardless of the current use and zoning for the site. Residential land use is assumed, because the most health-conservative exposure parameters are folded into that assumption; thus, a no further action determination can be made if the screening evaluation indicates that the contaminants present pose an insignificant risk or hazard. However, the residential scenario would not necessarily be protective of unrestricted land use for those chemicals that bioaccumulate in food products (e.g., dioxins). The Environmental Professional should consult with the project manager and DTSC toxicologist, if bioaccumulative chemicals are present at the site.

Additional evaluations and actions are necessary to address land uses other than residential. Therefore, the DTSC project manager must approve the assumption of any alternative land use in a PEA screening evaluation, such as, commercial/industrial land use. Restriction of the site to commercial/industrial use will probably require a land use covenant.

### 2.5.2.3 CHEMICAL GROUPS

Certain chemical groups are beyond the scope of a PEA evaluation, since they require more complex toxicological evaluations or represent acute health risks. Examples are:

wastes/soils which have a pH less than or equal to 2.0 or greater than or equal to 12.5; medical wastes; reactive/explosive wastes (e.g., strong oxidizers/ munitions); asbestos and radioactive wastes. These wastes require other techniques of investigation and assessment.

The discussions below should be taken into account when considering a PEA evaluation of the following chemicals and chemical groups:

- 1) **Polycyclic Aromatic Hydrocarbons (PAHs):** PAHs are often present in ambient concentrations in urban area soils due to past industrial activities. Therefore, ambient levels of PAHs may be considered in a site evaluation, if agreed upon by the DTSC project manager and toxicologist. More information on ambient PAH concentrations may be found in the current version of *Use of the Northern and Southern California Polynuclear Aromatic Hydrocarbon (PAH) Studies in the Manufactured Gas Plant Site Cleanup Process*<sup>41</sup>. Potentially carcinogenic PAHs detected in soil and listed in Table 2-4 below may be converted to benzo(a)pyrene (BaP) equivalent concentrations utilizing the most current US EPA equivalency factors shown in the table<sup>42</sup>. The total BaP equivalent concentration would then be compared to the BaP RSL and ambient PAH levels. Naphthalene is also a carcinogenic PAH but is not included in Table 2-4. Risk from exposure to naphthalene is evaluated separately.

As of the release date of this guidance manual, the toxicity criteria for benzo(a)pyrene are under review. Therefore, a DTSC toxicologist should be consulted if PAHs are potential chemicals of concern at a site.

**TABLE 2- 4 POTENCY EQUIVALENCY FACTORS (PEF) FOR PAHs**

Chemical Name	Equivalency Factor
benzo(a)pyrene	1.0
benzo(a)anthracene	0.1
benzo(b)fluoranthene	0.1
benzo(k)fluoranthene	0.01
Chrysene	0.001
Dibenzo(a,h)anthracene	1.0
indeno(1,2,3-c,d)pyrene	0.1

This table lists PEFs recommended by the USEPA and should be used in conjunction with the USEPA cancer toxicity criterion for B(a)P.

- 2) **Polychlorinated Biphenyls (PCBs):** Assume all PCBs analyzed as Aroclor mixtures are equivalent to Aroclor 1254 in cancer potency and noncancer toxicity.

<sup>41</sup> Human Health Risk Assessment Guidance resources page. DTSC Web site.

<http://www.dtsc.ca.gov/AssessingRisk/humanrisk2.cfm#guidance>

<sup>42</sup> USEPA. 2012. *USEPA Regional Screening Table – User’s Guide*. November.

[http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/usersguide.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/usersguide.htm)

- 3) **Polychlorinated Dibenzo-*p*-dioxins, Dibenzofurans (PCDD/PCDF), and certain PCBs:** PCDDs and PCDFs are often present in ambient concentrations due to widespread air dispersion during the burning of chlorine containing compounds in incinerators, backyard trash fires, forest fires, etc. They are also contaminants of pentachlorophenols, other pesticides and sewage sludge. Consequently, ambient or background dioxin/furan concentrations may need to be considered at sites where dioxins/furans are potential site-related chemicals of concern. Assume unspecified PCDD/PCDF are equivalent in cancer potency to 2,3,7,8-tetrachloro-dibenzo-*p*-dioxin (2,3,7,8-TCDD). However, if congeners have been specified, use the Toxicity Equivalency Factor (TEQ) approach with the TEQs shown in Table 2-5 below<sup>43</sup>. Total Dioxin-TEQ concentrations would then be compared to the Dioxin RSL. The evaluation of an agricultural or animal grazing site contaminated with PCDD/PCDFs is beyond the scope of a PEA, and the appropriate evaluation of such sites should be discussed with the project manager and a DTSC toxicologist.

---

<sup>43</sup> Van den Berg, M. et al. 2006. The 2005 World Health Organization Reevaluation of Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-Like Compounds. *Toxicological Sciences* 93(2):223-241.

**TABLE 2- 5 TOXICITY EQUIVALENCY FACTORS FOR DIOXINS AND DIOXIN-LIKE COMPOUNDS**

<b>Compound</b>	<b>WHO 2005 TEQ</b>
<i>Chlorinated dibenzo-p-dioxins</i>	
2,3,7,8-TCDD	1
1,2,3,7,8-PeCDD	1
1,2,3,4,7,8-HxCDD	0.1
1,2,3,6,7,8,-HxCDD	0.1
1,2,3,7,8,9-HxCDD	0.1
1,2,3,4,6,7,8-HpCDD	0.01
OCDD	0.0003
<i>Chlorinated dibenzofurans</i>	
2,3,7,8-TCDF	0.1
1,2,3,7,8-PeCDF	0.03
2,3,4,7,8-PeCDF	0.3
1,2,3,4,7,8-HxCDF	0.1
1,2,3,6,7,8-HxCDF	0.1
1,2,3,7,8,9-HxCDF	0.1
2,3,4,6,7,8-HxCDF	0.1
1,2,3,4,6,7,8-HpCDF	0.01
1,2,3,6,7,8,9-HpCDF	0.01
OCDF	0.0003
<i>Non-ortho substituted PCBs</i>	
PCB 77	0.0001
PCB 81	0.0003
PCB 126	0.1
PCB 169	0.03
<i>mono-ortho substituted PCBs</i>	
105	0.00003
114	0.00003
118	0.00003
123	0.00003
156	0.00003
157	0.00003
167	0.00003
189	0.00003

- 4) **Chromium:** Assume total chromium is all hexavalent unless valid data on speciation are available. Hexavalent chromium is a known irritant that can cause allergic dermatitis in humans.
  
- 5) **Total Petroleum Hydrocarbons (TPH) - Petroleum-Related Compounds:** Complex mixtures of petroleum hydrocarbons are found in crude oils, petroleum products, and various wastes from refineries and petroleum-related facilities. At sites

with known or suspected releases of petroleum compounds to the environment all media that have potentially been impacted should be investigated. Soil samples should be analyzed for TPH and reported by the carbon range and, if possible, as aliphatic or aromatic compounds. Methods for TPH analysis should be chosen in consultation with DTSC staff. If the source of the petroleum hydrocarbons is unknown, then a full scan for organic analytes should be conducted to identify the presence of toxic constituents and their concentrations prior to conducting the screening evaluation.

The individual compounds and carbon ranges detected will vary according to the original composition of the petroleum product, the time elapsed since the release, and site conditions. TPH-related compounds with established toxicity criteria should be specifically analyzed for in soil, groundwater, and/or soil vapor, including: BTEX compounds (i.e., benzene, ethylbenzene, toluene, and xylenes), hexane, methyl tert-butyl ether (MTBE), 2-methylnaphthalene, PAHs, including naphthalene, metals listed in the California Code of Regulations Title 22, Section 66261.24, Table II (formerly called California Assessment Manual (CAM) metals), and, in some circumstances, dioxins and PCBs.

TPH may be evaluated using one of the following approaches upon approval from the DTSC team.

- A) The 2015 USEPA RSLs list residential screening levels for TPH fractions, based on noncancer health effects, as follows, and may be used if aliphatic and aromatic fractions have been reported out separately:

<b>TPH Fraction</b>	<b>Carbon Range</b>
low aliphatic	C5-C8
medium aliphatic	C9-C18
high aliphatic	C19-C32
low aromatic	C6-C8
medium aromatic	C9-C16
high aromatic	C17-C32

- B) If the DQOs of the investigation are limited to reporting TPH as gasoline, diesel and motor oil, the 2013 SFBRQWCB residential health-risk-based ESLs may be used for screening purposes.

If the screening risk evaluation concludes that TPH at a site are not present at levels of concern for human health, TPH should be further evaluated for gross contamination, odor, nuisance, and potential to affect groundwater.

Locations and depths where soil vapor samples will be collected should be decided in consultation with the DTSC project team. Soil vapor sampling probes should be located close to source areas and within high-permeability soils. The necessity of soil

vapor sampling and use of models for evaluating TPH vapor intrusion should be discussed and agreed upon with DTSC staff. Vapor intrusion models that incorporate biodegradation are not appropriate for screening-level risk evaluation purposes.

If the PEA indicates that TPH-related compounds are the only major chemicals of potential concern, the DTSC project manager should be consulted to determine the most suitable environmental oversight agency for guidance in conducting an in-depth, site-specific evaluation.

Additional information on the evaluation of TPH in the environment may be found in the most current version of the State Water Resources Control Board's *Low-Threat Underground Storage Tank Case Closure Policy*<sup>44</sup>, the TPH chapter in the most current *User's Guide: Derivation and Application of Environmental Screening Levels*, published by the SFBRWQCB<sup>45</sup>, and the Massachusetts Department of Environmental Protection's *Characterizing Risks Posed by Petroleum Contaminated Sites: Implementation of the MADEP VPH/EPH Approach*<sup>46</sup>. Additional guidance on the evaluation of TPH at contaminated sites is forthcoming from DTSC.

- 6) **Metals:** For the purposes of this document, the term "metals" is taken to include true metals, such as cadmium and zinc; metalloid elements, such as arsenic and antimony; and selenium which is a nonmetal.
- 7) **Arsenic:** Arsenic is naturally present in soil at concentrations often greater than its risk-based screening level. Soil concentrations of arsenic may be elevated at a site because of past use or manufacture of arsenic-containing products, such as pesticides, wood preservatives, paints, dyes, electrical components and medical drugs, or as a contaminant in mine tailings. Site soil arsenic concentrations should first be compared to local background concentrations to determine whether further evaluation of this chemical is warranted, because naturally occurring background arsenic concentrations vary widely in different geographic regions. If further evaluation is necessary, it should be done in consultation with the DTSC project manager, geologist and toxicologist and may need to include the consideration of additional background data, bioavailability, end use of the property, and administrative controls. Detailed discussion on evaluating arsenic at a site is found in the most current version of DTSC's *Arsenic Strategies*<sup>47</sup>.

---

<sup>44</sup> State Water Resources Control Board. 2012. *Low-Threat Underground Storage Tank Case Closure Policy*. [http://www.waterboards.ca.gov/ust/lt\\_cls\\_plcy.html](http://www.waterboards.ca.gov/ust/lt_cls_plcy.html)

<sup>45</sup> San Francisco Bay Regional Water Quality Control Board. 2013. *User's Guide: Derivation and Application of Environmental Screening Levels*. Interim Final. [https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/esl.html](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/esl.html)

<sup>46</sup> Massachusetts Department of Environmental Protection Site Cleanup Policies & Guidance Web site. 2002. *Characterizing Risks Posed by Petroleum Contaminated Sites: Implementation of the MADEP VPH/EPH Approach*. Final Policy. October 31. <http://www.mass.gov/eea/agencies/massdep/cleanup/regulations/site-cleanup-policies-guidance.html>

<sup>47</sup> DTSC. 2009. *Arsenic Strategies, Determination of Arsenic Remediation Development of Arsenic Cleanup Goals*. January 16. <http://www.dtsc.ca.gov/AssessingRisk/upload/Arsenic-Cleanup-Goals-Jan09.pdf>



- 8) **Inorganic Lead:** Lead is most often elevated at sites because of historical uses of leaded gasoline and lead-based paints. The Cal/EPA OEHHA revised its toxicity evaluation of lead in 2007 by replacing the threshold blood lead concentration of 10 micrograms per deciliter ( $\mu\text{g}/\text{dL}$ ) blood with a source-specific, benchmark change of one  $\mu\text{g}/\text{dL}$  for the protection of children. One  $\mu\text{g}/\text{dL}$  is the estimated incremental increase in the blood lead level in children that would reduce intelligence quotient (IQ) by up to one point. DTSC revised the Lead Risk Assessment spreadsheet (LeadSpread; Version 8, 2011) to reflect this change in approach. Using this spreadsheet, the recommended residential soil lead screening level is 80 mg/kg, as stated in the DTSC HHRA Note 3. For more information, see *User's Guide to LeadSpread 8 and Recommendations for Evaluation of Lead Exposures in Adults*<sup>48</sup>.
- 9) **Methane and Hydrogen Sulfide:** Methane and hydrogen sulfide can be naturally present in certain areas, such as old oil fields and marshlands, as well as a result of past manufacturing activities, such as petroleum extraction and refining, pulp and paper operations, and at waste disposal facilities, such as landfills and wastewater drying beds. Evaluation of methane and/or hydrogen sulfide should be included in the PEA work plan if they are suspected of being present at the site through the DQO process. More information on sampling for methane is contained in *Advisory - Active Soil Gas Investigations*<sup>49</sup>. Methane is explosive between its Lower Explosive Limit (LEL) of 5% by volume and its Upper Explosive Limit (UEL) of 15% by volume. If potentially explosive gas levels are detected, an imminent and substantial danger may exist and a response action may be needed. In addition, methane can be a carrier gas for other volatile organic compounds in which case, the presence of methane may affect vapor intrusion assessments.

More information on methane investigations may be found in the most current *Advisory on Methane Assessment and Common Remedies at School Sites*<sup>50</sup> and *Evaluation of Biogenic Methane, A Guidance Prepared for the Evaluation of Biogenic Methane in Constructed Fills and Dairy Sites*<sup>51</sup>.

Hydrogen sulfide is a flammable, colorless, and toxic gas with a characteristic odor of rotten eggs. Humans are extremely sensitive to hydrogen sulfide odors and can smell such odors at concentrations as low as 0.5 to 1 part per billion by volume (ppbv) (0.70 to 1.39 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ )). At levels approaching 50

---

<sup>48</sup> More information can be found at LeadSpread 8 resources page. DTSC Web site. <https://dtsc.ca.gov/leadsread-8/>

<sup>49</sup> Cal/EPA. 2015. *Advisory – Active Soil Gas Investigations*. July. [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/VI\\_ActiveSoilGasAdvisory\\_FINAL.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/VI_ActiveSoilGasAdvisory_FINAL.pdf)

<sup>50</sup> DTSC. 2005. Evaluating & Cleaning-Up School Sites Three-Step Process, Step Three: Response Action, Advisories and Guidance Web site. *Advisory on Methane Assessment and Common Remedies at School Sites*. June. <https://dtsc.ca.gov/3-step-process/>

<sup>51</sup> DTSC. 2012. *Evaluation of Biogenic Methane, A Guidance Prepared for the Evaluation of Biogenic Methane in Constructed Fills and Dairy Sites*. March 28. [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/BF\\_Schools\\_Eval\\_of\\_Biogenic\\_Methane\\_March\\_2012.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/BF_Schools_Eval_of_Biogenic_Methane_March_2012.pdf)

ppb ( $69.7\mu\text{g}/\text{m}^3$ ), the odor can be offensive<sup>52</sup>. At high concentrations, a person may lose the ability to smell hydrogen sulfide. Hydrogen sulfide has a LEL of 4% and an UEL of 44%. The OEHHA Inhalation Reference Exposure Level (REL) for acute exposure is  $42\mu\text{g}/\text{m}^3$ . The REL for chronic exposure is  $10\mu\text{g}/\text{m}^3$ . If hydrogen sulfide is suspected to be present near or above these levels, handheld instruments should be employed at the site for screening purposes.

- 10) **Naturally Occurring Asbestos (NOA):** The PEA should consider whether NOA is present in surface or subsurface soils or rock at the site. Six regulated asbestos minerals belonging to two different mineral groups occur in California (i.e., serpentine and amphibole). NOA may be associated with specific rock types, faults or shear zones, geologic contacts, and zones of hydrothermal alteration. Asbestos minerals may also be present in soils or fill derived from asbestos-containing parent material. If the presence of NOA is suspected, information sources such as site records and files regarding manufacturing and disposal activities, statewide asbestos maps, mineral sheets, USGS and California Geological Survey open file reports, and other studies should be reviewed. A site inspection should be conducted by a California professional geologist or engineer properly trained and experienced in the identification of NOA. Based on the information gathered, sampling to determine if NOA is present at the site may be needed. The sampling strategy and analytical methods should be included in the PEA work plan. All NOA samples should be analyzed using the California Air Resources Board (CARB) Polarized Light Microscopy (PLM) method with a detection limit of 0.25% or less (CARB 435 PLM). If NOA is detected at greater than or equal to 0.25% by PLM, the conclusion in the PEA should recommend further evaluation of the site.

More information on NOA may be found in *Interim Guidance – Naturally Occurring Asbestos (NOA) at School Sites* (DTSC rev. 9/2004) at [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMBRP\\_POL\\_Guidance\\_Schools\\_NOA.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMBRP_POL_Guidance_Schools_NOA.pdf)

- 11) **Radon and Radioactive Materials:** Radon is a naturally occurring, radioactive, noble gas that is odorless and tasteless. It is formed as part of three radioactive decay chains that begin with uranium or thorium. These elements are found in small amounts in most rock, soil, and water. If radon or radioactive material is suspected of being present at the site, the Environmental Professional should contact the California Department of Public Health (DPH) and the DTSC project manager to determine whether and how the site should be evaluated.

- 12) **VOCs and Trichloroethylene (TCE):** VOCs are commonly encountered at hazardous waste sites and some require special consideration because of unique attributes. VOCs contaminating sub-surface soil and groundwater can volatilize upward and intrude into indoor air spaces resulting in potential exposure. If the VOC,

<sup>52</sup> Agency for Toxic Substances and Disease Registry (ATSDR). 2001. *Chapter 3: Landfill Gas Safety and Health Issues in Landfill Gas Primer, An Overview for Environmental Health Professionals.* <http://www.atsdr.cdc.gov/hac/landfill/html/ch3.html>

TCE, has been detected at a site where women of child-bearing age may reside, a DTSC toxicologist should be consulted, since short-term exposure to TCE has been determined to pose a risk to the developing fetus, and this potential hazard must be addressed in a screening risk evaluation. The short-term action level for TCE is 2  $\mu\text{g}/\text{m}^3$  for residential indoor air<sup>53</sup>.

#### 2.5.2.4 EXPOSURE POINT CONCENTRATIONS

An exposure point concentration of a chemical is the estimated concentration that is contacted by a receptor over an assumed duration of exposure. Generally, in a PEA, the maximum contaminant value detected from sampling should be used as the exposure point concentration.

For chemicals which were treated or stored on site, or for chemicals which are suspected to have been released on the site but sample data indicate the contaminant concentration is below the sample quantification limit (SQL, the practical quantification limit or PQL), then the value of the SQL should be used as the exposure point concentration.

In cases where there is adequate characterization, the 95 percent upper confidence limit (UCL) of the arithmetic mean may be used for the exposure point concentration, subject to review and approval by the DTSC project manager and toxicologist.

#### 2.5.2.5 TOXICITY VALUES

Toxicity values are embedded in the derivation of the media-specific screening levels, such as RSLs. In general, the most conservative toxicity values developed by entities within the Cal/EPA or the USEPA are used in calculating those screening levels. Therefore, selecting appropriate toxicity values is not necessary when using the method described above where the maximum concentration is compared to an acceptable generic screening concentration. If no screening level exists for a COPC, a DTSC toxicologist should be consulted for identifying an appropriate surrogate or developing applicable toxicity criteria.

Toxicity values will be needed if conducting a PEA using the alternative simplified exposure and risk equations described in Section 2.5.4. The selection of applicable toxicity values should always be based on a rigorous, scientific evaluation of the supporting toxicity studies and on the best available science. Generally, the more protective cancer and non-cancer toxicity criteria currently available from the USEPA and OEHHA should be used in a PEA with approval from a DTSC toxicologist. The most often cited sources of toxicity values include:

- US EPA's Integrated Risk Information System (IRIS)<sup>54</sup>.

<sup>53</sup> DTSC. 2014. *Human Health Risk Assessment (HHRA) Note Number: 5 Health-based Indoor Air Screening Criteria for Trichloroethylene (TCE)*. August 23.  
<http://www.dtsc.ca.gov/assessingrisk/humanrisk2.cfm>

<sup>54</sup> Integrated Risk Information System (IRIS) Database. US EPA. <http://www.epa.gov/iris/>

- Cancer potency factors and reference exposure levels (RELs) developed by OEHHA<sup>55</sup>,<sup>56</sup>.
- Toxicity values used to develop environmental criteria promulgated into California regulations, such as those used to calculate “No Significant Risk Levels” and “Maximum Allowable Dose Levels” (Proposition 65), or those used to derive California drinking water Maximum Contaminant Levels (MCLs) or the health-based dose criteria used to develop Public Health Goals (PHGs, which serve as the starting point for the ultimate development of MCLs).
- Provisional Peer Reviewed Toxicity Values (PPRTVs) derived by the US EPA Superfund Health Risk Technical Support Center (STSC). A DTSC toxicologist should be consulted prior to using any PPRTV in a PEA.

Use of oral cancer potency factors or chronic non-cancer toxicity criteria does not correct for differences in absorption and metabolism between the oral and dermal routes, nor are direct toxic effects on the skin accounted for. Thus, the use of oral potency factors or chronic non-cancer toxicity criteria may not satisfactorily express the dermal risk or hazard of a particular chemical. However, the other routes of exposure evaluated in the PEA usually overwhelm the dermal route and minimize any methodological uncertainty.

### 2.5.3 RISK/HAZARD CHARACTERIZATION

The basic screening risk equations are presented in Section 2.5. For a chemical identified as a carcinogen, the maximum soil or groundwater concentration detected is divided by its residential soil or tap water screening level (RSL), (calculated assuming a target risk of  $10^{-6}$  and modified, if necessary, as discussed in DTSC HHRA Note 3 so that the screening levels utilized are those specifically recommended by DTSC) and multiplied by  $10^{-6}$  to calculate the cancer risk posed by that chemical. For a chemical identified as causing adverse non-cancer health effects, the maximum concentration is simply divided by its screening level, assuming a Hazard Quotient (HQ) of one, to get a HQ for that chemical. The excess lifetime cancer risk for carcinogenic compounds is calculated for those compounds considered by Cal/EPA or USEPA to pose a carcinogenic risk to humans. This value represents the risk, or theoretical probability, of developing cancer from that chemical upon exposure to that medium. The HQ is calculated for each compound, carcinogenic as well as non-carcinogenic. This value is a measure of the non-carcinogenic toxicity of a compound; it is not a probability. The HQ is the ratio of the estimated dose from exposure to a compound in a medium, to a value which is believed not to produce adverse health effects.

For a VOC, the maximum soil vapor concentration detected is evaluated as described in Section 2.5.4.5.3 Vapors Indoor – Soil Vapors. If VOCs are detected in groundwater, the maximum VOC concentration detected in that medium is evaluated as described in

<sup>55</sup> OEHHA Toxicity Criteria Database. OEHHA. <http://www.oehha.ca.gov/risk/ChemicalDB/index.asp>

<sup>56</sup> OEHHA Reference Exposure Levels. <http://www.oehha.ca.gov/air/allrels.html>

Section 2.5.4.5.4 Vapors Indoor – Groundwater. The objective of the methods described in these sections is to calculate indoor air concentrations from soil vapor and groundwater VOC concentrations and then compare those indoor air concentrations with screening air RSLs modified, if necessary, as discussed in DTSC HHRA Note 3 so that the screening levels utilized are those specifically recommended by DTSC in the same way as described above for soil and groundwater.

**CUMULATIVE CANCER RISK CALCULATION.** As stated above, the maximum chemical concentration for each site-related chemical in each relevant environmental medium should be divided by their corresponding soil, tap water, or air risk-based screening level. For a carcinogenic chemical, the ratio is multiplied by  $10^{-6}$  to get a risk estimate for that chemical. For multiple carcinogenic chemicals, the risks for individual chemicals are added to get a screening estimate of the cumulative risk.

**CUMULATIVE NON-CANCER HAZARD CALCULATION.** For all chemicals causing non-carcinogenic health effects, the ratios derived by dividing the maximum concentration of each chemical by its corresponding soil, tap water, or air screening level based on non-cancer effects (HQs) are summed to get a site-related Hazard Index (HI) over all chemicals and all media evaluated (soil, air, water, as appropriate). If this HI is greater than 1, then the HIs should be recalculated by only summing exposure to all media for chemicals which have the same toxic manifestation or affect the same target organ. The DTSC toxicologist should be consulted for guidance in grouping compounds.

If the cumulative risk is less than one-in-a-million ( $1 \times 10^{-6}$ ) and the Hazard Index is less than one, the PEA human health screening risk evaluation report may be used as support for a “no further action” (NFA) decision.

## 2.5.4 ALTERNATIVE SIMPLIFIED EXPOSURE AND RISK EQUATIONS

It is unlikely that the site soil or water will be contaminated with chemicals considered toxic that do not have generic screening levels. For chemicals without such levels, the Environmental Professional should consult with the DTSC project manager and toxicologist to decide if the approach and equations discussed below should be used and how toxicity criteria will be selected.

Equations for evaluating exposure to VOCs coming from the sub-surface soil and/or groundwater and intruding indoors are provided in Sections 2.5.4.5.3 and 2.5.4.5.4 below.

The equations in the figures below are risk and hazard equations based on the USEPA *Risk Assessment Guidance for Superfund (RAGS)<sup>57</sup>, Volume 1, Human Health Evaluation, Manual, Part A (1989), Part E Supplemental Guidance for Dermal Risk Assessment (2004), and Part F Supplemental Guidance for Inhalation Risk Assessment (2009)* which have been simplified by incorporating default exposure values to achieve a

<sup>57</sup> Links to USEPA’s Risk Assessment Guidance documents can be found on their Human Health: Exposure Assessment Web page at:

<https://www.epa.gov/risk/risk-assessment-guidance#tab-1>

reasonable maximum estimation of exposure in a residential setting. These equations are presented because they provide information on the default exposure and risk/hazard evaluation approach, and they may be used if comparison to generic, established screening levels is not adequate for performing a PEA. These equations show how the risk and hazard for each exposure pathway are calculated. The equations for risk and hazard use the same default factors, except for the averaging time (AT) which is expressed in units of days (oral, dermal) or hours (inhalation). For cancer risk, exposures are averaged over a 70 year lifetime. For non-carcinogenic hazards, exposures are averaged over the assumed exposure duration. When evaluating non-carcinogenic hazard, a child (the receptor with the greatest estimated exposure) is generally evaluated. If an HI of one is not exceeded for the child, it will not be exceeded for any other age.

The risk/hazard equations are simplified to a pathway exposure factor and three variables: the chemical-specific toxicity value (slope factor (SF) or inhalation unit risk (IUR); Reference Dose (RfD); Reference Concentration (RfC) or Reference Exposure Level (REL)), the concentration of the chemical in the medium (C), and a dermal bioavailability term, if necessary. Importantly, these equations are not intended and should not be used for performing a quantitative, site-specific human health risk assessment. If dermal exposure is a major concern at a site, this should be so stated in the conclusion of the PEA. Further evaluation should then be considered according to the guidance provided in the USEPA RAGS, Volume 1, Part E.<sup>58</sup>

#### **2.5.4.1 SELECTION OF PATHWAYS INVOLVING ENVIRONMENTAL MEDIA**

The soil and air risk/hazard estimates must be calculated for all sites. If groundwater is contaminated with VOCs, the risk/hazard from the vapor intrusion exposure pathway should be calculated for the site, regardless of any beneficial use determinations. The assessment of the potential impact that onsite contamination may have on surface and groundwater is complex and will vary with site-specific conditions. In a PEA, groundwater should be considered a potential drinking water source, even though tap water is usually supplied by a municipal water source. Under certain circumstances, it may not be necessary to evaluate site groundwater as a drinking water source. A detailed rationale for eliminating the drinking water pathway must be provided in the PEA report. If the property itself has contaminated the site groundwater and groundwater flows offsite, then offsite receptors should be evaluated.

The following are potential preliminary evaluation results and the required risk/hazard calculations for each case:

- 1) At sites with limited soil contamination, the contaminants may not affect surface water or water bearing zones, now or in the future. In these cases the risk/hazard from water exposure need not be calculated. Calculation of the risk/hazard from soil and air will suffice.

---

<sup>58</sup> USEPA. 2004. *Risk Assessment Guidance for Superfund (RAGS), Volume I: Human Health Evaluation Manual (Part E, Supplemental Guidance for Dermal Risk Assessment) Interim*. USEPA Web site: <https://www.epa.gov/risk/risk-assessment-guidance#tab-1>

- 2) When the characterization of surface or groundwater contamination is adequate and the available water data are likely to represent the maximum concentrations of the contaminants, then the risk/hazard from water, soil, and air should be calculated.
- 3) When an acknowledged potential (which requires further investigation) exists for surface or groundwater to be affected by onsite contaminants, and available water data do not fully represent the nature and extent of the contamination, then the risk/hazard from water, soil, and air should be calculated. A qualifying statement should be included in the PEA to indicate clearly that the estimate of risk/hazard is based on data from water that may not represent the maximum contaminant concentrations present and that a final decision will be deferred until after further investigation.
- 4) When site-specific information is insufficient to judge the potential impact of contaminants in surface water and groundwater, then the calculation of risk/hazard should not proceed, because the resulting estimates may not reflect the potential risk/hazard posed by onsite contamination. In these instances the scoping and data collection phases of the investigation should be reviewed, as it is likely that additional site work will be necessary to gather the information to complete the calculations.

#### **2.5.4.2 WATER PATHWAY**

If water is a pathway of exposure for the site, the maximum groundwater concentration of a chemical is compared to its tap water RSL. As stated earlier, MCLs should not be used in a risk evaluation. If the chemical concentration is above its RSL, DTSC should be consulted, as additional evaluation may be necessary. The risk calculated is a summation of ingestion exposure, inhalation of VOCs released from water used indoors, inhalation of vapors migrating indoors from groundwater, and dermal exposure, for child and adult. These equations do not include exposure from ingestion of aquatic organisms in surface water but do include dermal absorption of contaminants in water. Chemical-specific Kp values for use in these following water equations may be found in the Estimation Programs Interface (EPI) Suite, developed by the USEPA<sup>59</sup>.

---

<sup>59</sup> USEPA Exposure Assessment Tools and Models.  
<http://www.epa.gov/opptintr/exposure/pubs/episuitedi.htm>

**FIGURE 2- 2 DERIVATION OF HAZARD INDEX EQUATION FOR NON-VOCs IN WATER**

**Basic Equation:**

$$\text{Hazard index}_{\text{nonvoc, water}} = (1/\text{RfDo}) \times C_w \times \frac{\text{IR}_w \times \text{EF} \times \text{ED}_{\text{child}}}{\text{BW} \times \text{AT}}$$

$$+ (1/\text{RfDo}) \times C_w \times \frac{\text{SA} \times \text{K}_p \times \text{ET} \times \text{EF} \times \text{ED} \times (1\text{L}/1000\text{cm}^3)}{\text{BW} \times \text{AT}}$$

**Where:**

- RfDo = oral reference dose (mg/kg-day)
- BW = body weight (15 kg-child)
- AT = averaging time (ED x 365 days/year; 2190 days-child)
- EF = exposure frequency (350 days/year)
- ED = exposure duration (6 years-child)
- IR<sub>w</sub> = intake rate (0.78 L/day-child)
- ET = exposure time during bathing (child – 0.54 hr/day)
- SA = skin surface area available for contact (6,378 cm<sup>2</sup>-child)
- K<sub>p</sub> = chemical-specific dermal permeability coefficient from water (cm/hour)
- C<sub>w</sub> = concentration of chemical in water (mg/L)

**Reduced Equation:**

$$\text{Hazard index}_{\text{nonvoc water}} = [(C_w/\text{RfDo}) \times 0.0499] + [(C_w/\text{RfDo}) \times 0.220 \times \text{K}_p]$$



**FIGURE 2- 3 DERIVATION OF HAZARD INDEX EQUATION FOR VOCs IN WATER**

**Basic Equation:**

$$\begin{aligned} \text{Hazard index}_{\text{voc, water}} = & (1/\text{RfD}_o) \times C_w \times \frac{\text{IR}_w \times \text{EF} \times \text{ED}_{\text{child}}}{\text{BW} \times \text{AT}_{\text{ing}}} \\ & + (1/\text{RfD}_o) \times C_w \times \frac{\text{SA} \times \text{K}_p \times \text{ET}_B \times \text{EF} \times \text{ED} \times (1\text{L}/1000\text{cm}^3)}{\text{BW} \times \text{AT}_{\text{derm}}} \\ & + (1/\text{RfC}) \times C_w \times \frac{\text{K} \times \text{ET}_{\text{air}} \times \text{EF} \times \text{ED}_{\text{child}}}{\text{AT}_{\text{inh}}} \\ & + \text{Hazard index}_{\text{Vapor Intrusion to Indoor Air}} \end{aligned}$$

**Where:**

- RfD<sub>o</sub> = oral reference dose (mg/kg-day)
- RfC = reference concentration (mg/m<sup>3</sup>)
- BW = body weight (15 kg-child)
- AT<sub>ing,derm</sub> = averaging time (ED x 365 days/year; 2190 days-child)
- AT<sub>inh</sub> = averaging time (ED x 365 days/year x 24 hours/day; 52,560 hrs-child)
- EF = exposure frequency (350 days/year)
- ED = exposure duration (6 years-child)
- IR<sub>w</sub> = intake rate (0.78 L/day-child)
- ET<sub>B</sub> = exposure time during bathing (child – 0.54 hr/day)
- SA = skin surface area available for contact (6,378 cm<sup>2</sup>-child)
- K<sub>p</sub> = chemical-specific dermal permeability coefficient from water (cm/hour)
- ET<sub>air</sub> = 24 hr/day
- K = Andelman volatilization factor (0.5 L/m<sup>3</sup>)
- C<sub>w</sub> = concentration of chemical in water (mg/L)

**Reduced Equation:**

$$\text{Hazard index}_{\text{water}} = [(C_w/\text{RfD}_o) \times 0.0499] + [(C_w/\text{RfD}_o) \times 0.220 \times \text{K}_p] + [(C_w/\text{RfC or REL}) \times 0.479] + \text{Hazard index}_{\text{Vapor Intrusion to Indoor Air}}$$

\* Notes:

1. RfCs have units of mg/m<sup>3</sup>, whereas reference exposure levels (RELs) have units of µg/m<sup>3</sup>. This equation is based on an inhalation toxicity criterion with units of mg/m<sup>3</sup>. Therefore, if a REL will be used in the equation, the REL units must first be converted from µg/m<sup>3</sup> to mg/m<sup>3</sup>.
2. The Andelman volatilization factor (K) of 0.5 L/m<sup>3</sup> is used to evaluate household use of water e.g. showering, laundering, and dish washing.

**FIGURE 2- 4 DERIVATION OF RISK EQUATION FOR NON-VOCs IN WATER**

**Basic Equation:**

$$\begin{aligned} \text{Risk}_{\text{nonvoc, water}} = & \text{SF}_o \times C_w \times \frac{\text{IR}_w \times \text{EF} \times \text{ED}_{\text{adult}}}{\text{BW}_{\text{adult}} \times \text{AT}} \\ & + \text{SF}_o \times C_w \times \frac{\text{IR}_w \times \text{EF} \times \text{ED}_{\text{child}}}{\text{BW}_{\text{child}} \times \text{AT}} \\ & + \text{SF}_o \times C_w \times \frac{\text{SA}_{\text{adult}} \times K_p \times \text{ET} \times \text{EF} \times \text{ED}_{\text{adult}} \times (1\text{L}/1000 \text{cm}^3)}{\text{BW}_{\text{adult}} \times \text{AT}} \\ & + \text{SF}_o \times C_w \times \frac{\text{SA}_{\text{child}} \times K_p \times \text{ET} \times \text{EF} \times \text{ED}_{\text{child}} \times (1\text{L}/1000 \text{cm}^3)}{\text{BW}_{\text{child}} \times \text{AT}} \end{aligned}$$

**Where:**

- SF<sub>o</sub> = Slope factor ([mg/kg-day]<sup>-1</sup>)
- BW = body weight (80 kg-adult; 15 kg-child)
- AT = averaging time (70 years x 365 days/year; 25,550 days)
- EF = exposure frequency (350 days/year)
- ED = exposure duration (20 years-adult; 6 years-child)
- IR<sub>w</sub> = ingestion rate (2.5 L/day-adults; 0.78 L/day-child)
- ET = exposure time during bathing (0.71 hr/day-adult; 0.54 hr/day-child)
- SA = skin surface area available for contact (20,900 cm<sup>2</sup>-adult; 6,378 cm<sup>2</sup>-child)
- K<sub>p</sub> = chemical-specific dermal permeability coefficient from water (cm/hour)
- C<sub>w</sub> = concentration of chemical in water (mg/L)

**Reduced Equation:**

$$\text{Risk}_{\text{water}} = (\text{SF}_o \times C_w \times 0.0128 ) + (\text{SF}_o \times C_w \times 0.0697 \times K_p)$$

**FIGURE 2- 5 DERIVATION OF RISK EQUATION FOR VOCs IN WATER**

**Basic Equation:**

$$\begin{aligned}
 \text{Risk}_{\text{voc, water}} = & \text{SF}_o \times C_w \times \frac{\text{IR}_w \times \text{EF} \times \text{ED}_{\text{adult}}}{\text{BW}_{\text{adult}} \times \text{AT}_{\text{ing}}} \\
 & + \text{SF}_o \times C_w \times \frac{\text{IR}_w \times \text{EF} \times \text{ED}_{\text{child}}}{\text{BW}_{\text{child}} \times \text{AT}_{\text{ing}}} \\
 & + \text{SF}_o \times C_w \times \frac{\text{SA}_{\text{adult}} \times \text{K}_p \times \text{ET}_B \times \text{EF} \times \text{ED}_{\text{adult}} \times (1\text{L}/1000 \text{cm}^3)}{\text{BW}_{\text{adult}} \times \text{AT}_{\text{derm}}} \\
 & + \text{SF}_o \times C_w \times \frac{\text{SA}_{\text{child}} \times \text{K}_p \times \text{ET}_B \times \text{EF} \times \text{ED}_{\text{child}} \times (1\text{L}/1000\text{cm}^3)}{\text{BW}_{\text{child}} \times \text{AT}_{\text{derm}}} \\
 & + (\text{IUR}) \times 1000 \text{ } \mu\text{g}/\text{mg} \times C_w \times \frac{\text{K} \times \text{ET}_{\text{air}} \times \text{EF} \times \text{ED}_{\text{resident}}}{\text{AT}_{\text{inh}}} \\
 & + \text{Risk}_{\text{Vapor Intrusion to Indoor Air}}
 \end{aligned}$$

**Where:**

- SF<sub>o</sub> = Slope factor ([mg/kg-day]<sup>-1</sup>)
- IUR = Inhalation unit risk factor ([μg/m<sup>3</sup>]<sup>-1</sup>)
- BW = body weight (80 kg-adult; 15 kg-child)
- AT<sub>ing,derm</sub> = averaging time (70 years x 365 days/year; 25,550 days)
- AT<sub>inh</sub> = averaging time (70 years x 365 days/year x 24 hours/day; 613,200 hrs)
- EF = exposure frequency (350 days/year)
- ED = exposure duration (20 years-adult; 6 years-child; 26 years-resident combine (adult and child))
- IR<sub>w</sub> = Intake rate (2.5 L/day-adults; 0.78 L/day-child)
- ET<sub>B</sub> = exposure time during bathing (0.71 hr/day-adult; 54 hr/day-child)
- SA = skin surface area available for contact (20,900 cm<sup>2</sup>-adult; 6,378 cm<sup>2</sup>-child)
- K<sub>p</sub> = chemical-specific dermal permeability coefficient from water (cm/hour)
- ET<sub>air</sub> = 24 hr/day
- K\* = Andelman volatilization factor (0.5 L/m<sup>3</sup>)
- C<sub>w</sub> = concentration of chemical in water (mg/L)

**Reduced Equation:**

$$\text{Risk}_{\text{water}} = (\text{SF}_o \times C_w \times 0.0128) + (\text{SF}_o \times C_w \times 0.0687 \times \text{K}_p) + (\text{IUR} \times C_w \times 178) + \text{Risk}_{\text{Vapor Intrusion to Indoor Air}}$$

\* Note: The Andelman volatilization factor (K) of 0.5 L/m<sup>3</sup> is used to evaluate household use of water e.g. showering, laundering, and dish washing.

### 2.5.4.3 SOIL PATHWAY

Contaminated soil is evaluated by comparing the maximum soil concentration of a chemical to its generic screening level to derive the risk/hazard posed by that concentration as discussed in Section 2.5.3. If additional or alternative evaluation is necessary, the equations in the figures below may be used. The risk calculated is a summation of the incidental soil ingestion exposure for a child and an adult, and the dermal exposure for a child and an adult. Hazard is calculated for the first 6 years of childhood. If the HI is not exceeded for the child, it will not be exceeded for any other age. The equations do not include exposure from ingestion of homegrown fruits and vegetables, or products from animal (e.g., meat, milk, eggs) that feed on vegetation grown on contaminated soil. Risk and hazards from vapors emanating from soil are discussed in Section 2.5.4.4.

The dermal absorption fractions for specific chemicals and chemical classes for use in these soil equations are given in Appendix A, Table 1.

**FIGURE 2- 6 DERIVATION OF HAZARD INDEX EQUATION FOR SOIL**

**Basic Equation:**

$$\text{Hazard index}_{\text{soil}} = (1/\text{RfD}_o) \times C_s \times \frac{\text{IR}_{s, \text{child}} \times \text{EF} \times \text{ED}_{\text{child}} \times 10^{-6} \text{ kg/mg}}{\text{BW}_{\text{child}} \times \text{AT}}$$

$$+ (1/\text{RfD}) \times C_s \times \frac{\text{SA}_{\text{child}} \times \text{AF} \times \text{ABS} \times \text{EF}_{\text{child}} \times \text{ED}_{\text{child}} \times 10^{-6} \text{ kg/mg}}{\text{BW}_{\text{child}} \times \text{AT}}$$

**Where:**

- RfD<sub>o</sub> = oral reference dose (mg/kg-day)
- BW = body weight (15 kg-child)
- AT = averaging time (6 years x 365 days/year; 2190 days-child)
- EF = exposure frequency for soil ingestion and dermal contact (350 days/year)
- ED = exposure duration (6 years-child)
- IR<sub>s</sub> = incidental soil ingestion rate (200 mg/day-child)
- SA = exposed skin surface area (2900 cm<sup>2</sup>-child)
- AF = soil to skin adherence factor (0.2 mg/cm<sup>2</sup>-child)
- ABS = fraction of chemical absorbed from soil
- C<sub>s</sub> = concentration of chemical in soil (mg/kg)

**Reduced Equation:**

$$\text{Hazard index}_{\text{soil}} = [(C_s/\text{RfD}) \times 1.28 \times 10^{-5}] + [(C_s/\text{RfD}) \times 3.71 \times 10^{-5} \times \text{ABS}]$$

**FIGURE 2-7 DERIVATION OF RISK EQUATION FOR SOIL**

**Basic Equation:**

$$\begin{aligned} \text{Risk}_{\text{soil}} = & \text{SF}_o \times C_s \times \frac{\text{IR}_{s, \text{adult}} \times \text{EF} \times \text{ED}_{\text{adult}} \times 10^{-6} \text{ kg/mg}}{\text{BW}_{\text{adult}} \times \text{AT}} \\ & + \text{SF}_o \times C_s \times \frac{\text{IR}_{s, \text{child}} \times \text{EF} \times \text{ED}_{\text{child}} \times 10^{-6} \text{ kg/mg}}{\text{BW}_{\text{child}} \times \text{AT}} \\ & + \text{SF}_o \times C_s \times \frac{\text{SA}_{\text{adult}} \times \text{AF} \times \text{ABS} \times \text{EF} \times \text{ED}_{\text{adult}} \times 10^{-6} \text{ kg/mg}}{\text{BW}_{\text{adult}} \times \text{AT}} \\ & + \text{SF}_o \times C_s \times \frac{\text{SA}_{\text{child}} \times \text{AF} \times \text{ABS} \times \text{EF} \times \text{ED}_{\text{child}} \times 10^{-6} \text{ kg/mg}}{\text{BW}_{\text{child}} \times \text{AT}} \end{aligned}$$

**Where:**

- SF<sub>o</sub> = Slope factor ([mg/kg-day]<sup>-1</sup>)
- BW = body weight (80 kg-adults, 15 kg-child)
- AT = averaging time (70 years x 365 days/year; 25,550 days)
- EF = exposure frequency for soil ingestion (350 days/year)
- EF = exposure frequency (350 days/year)
- ED = exposure duration (20 years-adult, 6 years-child)
- IR<sub>s</sub> = incidental soil ingestion rate (100 mg/day-adult, 200 mg/day-child)
- SA = exposed skin surface area (6032 cm<sup>2</sup>-adult, 2900 cm<sup>2</sup>-child)
- AF = soil to skin adherence factor (0.07 mg/cm<sup>2</sup>-adult, 0.2 mg/cm<sup>2</sup>-child)
- ABS = fraction of chemical absorbed from soil
- C<sub>s</sub> = concentration of chemical in soil (mg/kg)

**Reduced Equation:**

$$\text{Risk}_{\text{soil}} = (\text{SF}_o \times C_s \times 1.44 \times 10^{-6}) + (\text{SF}_o \times C_s \times 4.62 \times 10^{-6} \times \text{ABS})$$

#### 2.5.4.4 AIR PATHWAY

The risk and hazard index (HI), for the air pathway are based on either the exposure to volatile emissions coming from soil for VOCs and/or the exposure to fugitive dust emissions from soil for non-VOCs. A VOC is a chemical with a Henry's Law constant of  $1 \times 10^{-5}$  atmospheres-m<sup>3</sup>/mole or greater. A representative list of VOCs is given in the DTSC *Vapor Intrusion Guidance*<sup>60</sup>.

The risk and hazard equations for VOCs and non-VOCs are presented in the figures below. The estimated risk is based on childhood and adult exposure. The HI is calculated for the first 6 years of childhood, because the HI for the child will not be exceeded by the HI for any other age. Air monitoring data generally are not needed for a PEA screening evaluation but are useful for worker health and safety monitoring and fence line monitoring for non-occupational receptors during removal actions.

---

<sup>60</sup> DTSC. 2011. *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*. October. <https://dtsc.ca.gov/vapor-intrusion/>

**FIGURE 2- 8 DERIVATION OF HAZARD INDEX FOR EQUATION FOR AIR**

**Basic Equation:**

$$\text{Hazard Index}_{\text{air}} = \frac{1}{\text{RfC} \times 1000 \text{ ug/mg}} \times C_a \times \frac{\text{ET} \times \text{EF} \times \text{ED}_{\text{child}}}{\text{AT}}$$

**Where:**

- RfC\* = Reference concentration (mg/m<sup>3</sup>)
- C<sub>a</sub> = Concentration in air (µg/m<sup>3</sup>)
- EF = Exposure frequency (350 days/year)
- ED<sub>child</sub> = Child exposure duration (6 years)
- ET = Exposure time (24 hours/day)
- AT = Averaging time (6 years x 365 days/year x 24 hours/day; 52,560 hrs-child)

**Reduced Equation:**

$$\text{Hazard Index}_{\text{air}} = 1/(\text{RfC}) \times C_a \times 0.000959$$

\* Note:

1. RfCs have units of mg/m<sup>3</sup>, whereas reference exposure levels (RELs) have units of µg/m<sup>3</sup>. This equation is based on an inhalation toxicity criterion with units of mg/m<sup>3</sup>. Therefore, if a REL will be used in the equation, the REL units must first be converted from µg/m<sup>3</sup> to mg/m<sup>3</sup>.



## FIGURE 2- 9 DERIVATION OF RISK EQUATION FOR AIR

### Basic Equation:

$$\text{Risk}_{\text{air}} = \text{IUR} \times C_a \times \frac{\text{ET} \times \text{EF} \times \text{ED}_{\text{adult + child}}}{\text{AT}}$$

### Where:

- IUR = Inhalation unit risk factor ( $\mu\text{g}/\text{m}^3$ )<sup>-1</sup>
- C<sub>a</sub> = Concentration in air ( $\mu\text{g}/\text{m}^3$ )
- EF = Exposure frequency (350 days/year)
- ED<sub>adult + child</sub> = Exposure duration for resident (26 years total)
- ET = Exposure time (24 hours/day)
- AT = Averaging time (70 years x 365 days/year x 24 hours/day; 613,200 hours)

### Reduced Equation:

$$\text{Risk}_{\text{ai}} = \text{IUR} \times C_a \times 0.356$$

## 2.5.4.5 ESTIMATION OF AIR CONCENTRATION

The air concentration of VOCs and non-VOCs emanating from soil are calculated differently. Semi-volatile organic compounds and metals in soil are evaluated in outdoor air using particulate emission factors (PEFs) to obtain concentrations of chemicals in dust. VOCs in soil are evaluated as discussed in Sections 2.5.4.5.2 and 2.5.4.5.3.

### 2.5.4.5.1 PARTICULATE MATTER

PEFs are used to develop an estimate of the concentration of a chemical in dust based on its concentration in soil. This approach assumes that the dust from the site is caused by the wind and not created by mechanical means (e.g. construction activities, tilling, automobile traffic, etc.). A default PEF of  $1.36\text{E}+09$  ( $\text{m}^3/\text{kg}$ ) is used, because this is the same default value used by the USEPA in their RSL Calculator<sup>61</sup>. The default PEF assumes an infinite source of chemicals, a vegetative cover of 50%, and a mean annual wind speed of 4.69 m/s, which is equivalent to a dust concentration of  $0.76 \mu\text{g}/\text{m}^3$  at the receptor. The default dispersion term (Q/C) of  $93.77$  ( $\text{g}/\text{m}^2\text{-s}$  per  $\text{kg}/\text{m}^3$ ) is based on a site of 0.5 acres and dispersion modeling runs of 29 sites across the United States. The default Q/C provides a conservative estimate of the long-term exposure to dust. Site-specific Q/Cs may be used if demonstrated to be applicable for estimation of long-term exposure to dust at a site.

Figure 2-10 provides an equation for estimating a non-volatile chemical concentration in air as suspended soil particulates.

---

<sup>61</sup> USEPA. Screening Tools for Chemical and Radionuclide Contaminants RSL Calculator. [http://epa-prgs.ornl.gov/cgi-bin/chemicals/csl\\_search](http://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search)

**FIGURE 2- 10 ESTIMATION OF AIR CONCENTRATION FOR NON-VOCS**

$$Ca = \frac{Cs}{PEF} \times 1000 \text{ ug/mg}$$

Where,

$Ca$  = Chemical Concentration in Air,  $\text{ug/m}^3$

$Cs$  = Maximum Reported Soil Concentration,  $\text{mg/kg}$

$PEF$  = Particulate Emission Factor (default =  $1.36\text{E} + 09 \text{ m}^3/\text{kg}$ )

$$= \frac{Q}{C} \times \frac{3600 \text{ sec/hr}}{0.036 \times (1-V) \times \left(\frac{Um}{Ut}\right)^3 \times F(x)}$$

Where,

$Q/C$  = Inverse of mean concentration at the center of a 0.5-acre-square source

$$\left( \text{default} = \frac{93.77 \text{ g/m}^2 \text{ -sec}}{\text{kg/m}^3} \right)$$

$V$  = Fraction of vegetative cover (default = 0.5 or 50%)

$Um$  = Mean annual wind speed cover (default = 4.69 m/sec)

$Ut$  = Equivalent threshold value of windspeed at 7 m (default = 11.32 m/sec)

$F(x)$  = Function dependent on  $Um/Ut$  (default = 0.194)

USEPA Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites,  
December 2002

### 2.5.4.5.2 VAPORS OUTDOOR

Although there may be exposure to VOCs in the outdoor or ambient air emanating from soil, this pathway is usually insignificant compared to the indoor air pathway. Therefore, the VOC outdoor air pathway is not included in these equations for the sake of simplicity. This represents a deviation from the equations used to develop RSLs which do include inhalation of VOCs in outdoor air.

### 2.5.4.5.3 VAPORS INDOOR – SOIL VAPORS

VOCs in indoor air may be present as the result of volatilization of compounds intruding indoors from sub-surface soil. The inhalation of indoor air contaminated by vapors coming from soil is the overriding exposure pathway for VOCs. The following approach may be used to estimate hazard and risk in a screening risk evaluation. First, the indoor air concentration is calculated based upon the following equation.

$$\alpha = C_{\text{Indoor}}/C_{\text{Soil Vapor}}$$

where:

$\alpha$  = Steady-state attenuation factor, the ratio of the concentration of the VOC indoors to the concentration of the VOC in soil vapor

$C_{\text{Soil Vapor}}$  = Measured soil vapor concentration in  $\mu\text{g}/\text{m}^3$

$C_{\text{Indoor}}$  = Indoor air concentration in  $\mu\text{g}/\text{m}^3$

Therefore:

$$C_{\text{indoor}} = \alpha \times C_{\text{soil Vapor}}$$

The attenuation factors used should be those recommended in the most current version of the *Vapor Intrusion Guidance*<sup>62</sup>. The attenuation factor is 0.002 for existing residences or 0.001 for future residences. If the soil vapor concentration represents a sub-slab concentration beneath an existing building, the attenuation factor to be used is 0.05. The equation is solved for the indoor air concentration in the building. If a carcinogen, this estimated indoor air concentration is divided by its DTSC-recommended residential air screening level and multiplied by  $10^{-6}$  to calculate the cancer risk in indoor air for the specific VOC. If identified as causing adverse non-cancer health effects, the indoor air concentration is divided by its screening level to get a HQ for that chemical. If no screening level exists for the chemical, the concentration may be input as the  $C_a$  in the equations shown in Figures 2.8 and 2.9 to calculate the hazard and risk posed by the VOC.

<sup>62</sup> DTSC. 2011. *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*. October. [http://www.dtsc.ca.gov/Vapor\\_Intrusion](http://www.dtsc.ca.gov/Vapor_Intrusion)

#### 2.5.4.5.4 VAPORS INDOOR – GROUNDWATER

Evaluation of the inhalation of a vapor migrating indoors from groundwater may be performed by first converting the groundwater VOC concentration to a soil vapor concentration as described in the *Vapor Intrusion Guidance*. The conversion equation is:

$$C_{\text{soil vapor}} = C_{\text{groundwater}} \times H_c \times C_f$$

Where:

$C_{\text{soil vapor}}$	= Soil vapor concentration in $\mu\text{g}/\text{m}^3$
$C_{\text{groundwater}}$	= Groundwater concentration in $\mu\text{g}/\text{L}$
$H_c$	= Henry's law constant (unitless) <sup>63</sup>
$C_f$	= Conversion factor ( $1000\text{L}/\text{m}^3$ )

The calculated soil vapor concentration is used to estimate the indoor air concentration, as shown in Section 2.5.4.5.3 and the risk and/or hazard calculated.

If VOCs are detected in soil vapor and/or groundwater, it is important to consult the current version of DTSC's *Vapor Intrusion Guidance*<sup>64</sup> for more detailed information, as the issue of vapors intruding indoors from the subsurface is rapidly evolving.

#### 2.5.4.6 SUMMATION OF RISK/HAZARD FOR ALL MEDIA

For cancer risk, sum risks from each carcinogen over all exposure media and for all carcinogens to obtain the total excess lifetime cancer risk posed by the contaminants at the site. For hazard, sum the hazard quotients from each compound over all exposure media and for all chemicals to obtain the HI posed by the contaminants at the site. For screening purposes, this simplifies the calculation of HI by disregarding the toxic manifestation/target organ affected by each compound. If this HI is greater than 1, then the HIs should be recalculated by only summing exposure to all media for chemicals which have the same toxic manifestation or affect the same target organ. The DTSC toxicologist should be contacted for guidance in grouping compounds.

A cancer risk estimate greater than  $10^{-6}$  or a HI greater than 1 indicates the presence of contamination which may pose a significant threat to human health. Exceptions will generally include sites with elevated background concentrations, sites where other agency criteria are more stringent, and sites with specific circumstances that allow for a risk management decision to increase the acceptable screening levels. In cases where chemicals are left in place exceeding acceptable levels according to a residential

<sup>63</sup> USEPA Exposure Assessment Tools and Models.  
<http://www.epa.gov/opptintr/exposure/pubs/episuitedi.htm>

The chemical-specific Henry's law constant, given in  $\text{atm}\cdot\text{m}^3/\text{mol}$ , is multiplied by 41 to obtain the unit less value used in this equation.

<sup>64</sup> DTSC. 2011. *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*. October. <http://www.dtsc.ca.gov/Vapor-Intrusion/>

scenario, a restricted land-use covenant (LUC), an on-going operation and maintenance (O&M) agreement, or other controls may be required. All potential scenarios should be discussed with the DTSC project manager prior to selection of the most applicable scenario for the site.

## 2.5.5 UNCERTAINTY ANALYSIS

As an option, the PEA report may contain a section qualitatively discussing uncertainties in the human health screening evaluation. This discussion should not debate the validity of the default exposure factors, because such factors are generic to assumed behavioral and physiological factors appropriate for humans in a residential setting (e.g., soil ingestion rates for a child). Instead, the uncertainty section should focus on specific site conditions which contribute most significantly to uncertainty in the risk and hazard estimates. Reliance on the information presented in the uncertainty analysis to decide "no further action" or NFA when the screening evaluation estimates risk greater than  $10^{-6}$  or a HI greater than 1, warrants discussions with DTSC.

A quantitative or stochastic uncertainty analysis should not be presented; as such an analysis is beyond the scope of a screening evaluation and is more appropriate in a full baseline risk assessment. An in-depth uncertainty analysis is of no value in a screening evaluation when the outcome of the PEA process is binary, i.e., whether further action or investigation is warranted.

## 2.6 ECOLOGICAL SCREENING EVALUATION

An ecological screening evaluation should be performed for all sites in a PEA, even sites located in heavily urbanized areas. The ecological screening or scoping evaluation adopts the basic approach suggested by DTSC (DTSC, 1996)<sup>65</sup> and USEPA (USEPA 1989b<sup>66</sup>, 1992<sup>67</sup>, 1997<sup>68</sup>); however, the evaluation is qualitative rather than quantitative. The ecological screening evaluation relies on the professional judgment of the Environmental Professional to qualitatively evaluate the potential risk to non-human receptors posed by contaminants released on the site. The preparer cannot assume that the human health screening evaluation provides an estimate of the threat to biota. The term "biota" excludes humans, and generally refers to non-domesticated terrestrial and aquatic plants and animals, but can also include domesticated species, such as livestock.

Questions to consider in an ecological screening evaluation:

---

<sup>65</sup> DTSC. Ecological Risk Guidance and Tools Web site. <https://dtsc.ca.gov/ecological-risk-assessment-hero/>

<sup>66</sup> USEPA, 1989. *Environmental Evaluation Manual. Volume II. Risk Assessment Guidance for Superfund. Interim Final*, EPA 540/1-89/001. Office of Emergency and Remedial Response. March. Available from the National Service Center for Environmental Publications (NSCEP) Web site. <http://www.epa.gov/nscep/index.html>

<sup>67</sup> USEPA. 1992. *Interim Report Dermal Exposure Assessment: Principles and Applications*, EPA/600/8-0 011. January. <https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=12188>

<sup>68</sup> USEPA. Waste and Cleanup Risk Assessment Web site. Ecological Risk Assessment Guidance for <https://www.epa.gov/risk/ecological-risk-assessment-guidance-superfund-process-designing-and-conducting-ecological-risk>

- Is habitat present on site?
- Is habitat adjacent to the site?
- Are there “unmanaged” landscape areas?
- Are wetlands, including streams, adjacent to the site?
- Is there potential for overland flow from the site to adjacent wetlands or shorelines?
- Does groundwater have the potential to surface offsite?
- Is groundwater shallow enough for plants to access?
- Is there potential for the presence of special status species? (Special status species are not the only receptors that need to be considered.)
- Does the future end use include open space?
- Will the site remain vacant for some undetermined time prior to development?
- Does the site have features that may attract ecological receptors?
- How large are the affected areas?

The approach used in the screening-level ecological evaluation is to identify potentially complete exposure pathways between the areas of contamination and biota which occupy or potentially could occupy the site in the future, or habitats outside of the site boundary that could potentially be affected by contamination from the site. If there are potentially complete exposure pathways, further site investigation and assessment may be warranted.

### **2.6.1 SITE CHARACTERIZATION**

The chemical and physical characterization of a site for an ecological screening evaluation is similar to that needed to support a human health screening evaluation. However, certain aspects, such as contamination of plants and sediments, may require additional investigation. Particular attention should be given to identification of chemicals of ecological concern to biota, since a chemical not generally considered a threat to human health may be a chemical of concern for biota. The PEA should contain a table listing all detected chemical contaminants, with maximum and minimum concentrations, number of samples collected and number of detections, as well as any information on the specific habitats present where the contaminants were detected.

### **2.6.2 BIOLOGICAL CHARACTERIZATION**

The initial biological characterization of sites in highly urbanized or developed areas with little or no plant community (e.g., paved facilities) is described in the most current Scoping Assessment guidance<sup>69</sup> (DTSC, 1996). For other sites, a biological characterization of the site, conducted by a qualified field biologist, is needed to identify the biota actually or potentially occurring at the site. Concerned regulatory agency personnel should be contacted and provided with advance notice of the date and time of the site survey. In many California habitats, a biological characterization should preferentially be conducted

<sup>69</sup> DTSC. Ecological Risk Guidance and Tools Web site contains guidance on preparation of scoping assessment documents. <https://dtsc.ca.gov/ecological-risk-assessment-hero/>

during the time of year in which plants are actively growing (late winter through spring). Plant surveys conducted outside of this time of year may be of limited use as many species that are present may be senescent and difficult to identify or not present.

The biological characterization should allow identification and determination of the extent of coverage of all site-specific habitats. The PEA should include a discussion of how the measure of coverage was selected. Off-site habitats that may be affected by site-related contamination should also be evaluated to the extent practical. Marine or estuarine habitats should be evaluated in terms of both the water and sediment components.

Terrestrial habitats such as forest, oak woodland, grasslands, vernal pools, riparian, lacustrine, palustrine, desert, sand dune, coastal chaparral, and agricultural or maintained landscapes, such as golf courses, should be evaluated and characterized. Transition zone habitats such as freshwater wetlands, saltwater wetlands, brackish wetlands, marine intertidal areas and mudflats of rivers, lakes or streams should be evaluated and characterized. Biological characterization of the site should also identify the species and types of communities potentially impacted due to their occurrence at nearby areas (i.e., within 1 mile). The location of all wildlife areas, preserves, reserves, sanctuaries, parks, natural areas, conservation areas, or other protected areas within 1 mile of the site should be identified.

Particular emphasis should be placed on identification of special status species and their habitats which occur on or within a one-mile radius of the site. Special status species include California species of special concern; state and federally listed rare, threatened or endangered species; and, species which are proposed or recommended for state or federal listing. The California Department of Fish and Wildlife's (DFW) Biogeographic Data Branch<sup>70</sup> can be contacted for the current special animal and special plant lists. The DFW's California Natural Diversity Database (NDDDB) and the Biogeographic Information and Observation System (BIOS) online mapping tool can be a starting point for location information on special status species which have been found near the site; however, the NDDDB and BIOS are not all-inclusive listings.

In lieu of an extensive site-specific biological survey conducted over an extended period of time to identify species occupying each distinct habitat, the species expected to occupy each habitat can be identified. In such an instance, a qualified field biologist would first identify each distinct habitat occupying the site and the surrounding area within one mile (include identification of locations where contaminants may be transported). Then the species which can be expected to occupy those habitats can be identified based on the literature.

### **2.6.3 PATHWAY ASSESSMENT**

---

<sup>70</sup> California Department of Fish and Wildlife Biogeographic Data Branch. Web site. <http://www.dfg.ca.gov/biogeodata/>



Once potential species and habitats are identified, a pathway assessment is conducted. Pathway assessment identifies the potentially complete exposure pathways for which there is contact between biota and chemicals of concern in any medium and by any route. Media to be considered include soil, air, water, and biota. Physical and chemical characteristics which influence environmental fate and transport must also be considered. In particular, offsite transport of contaminants must be evaluated, e.g., surface drainage pathways or potential contact of ecological receptors via groundwater transport to surface waters. Pathways may be direct, such as inhalation of air, or indirect, such as dietary contamination through the food web. Exposure routes to be evaluated include inhalation, ingestion, and dermal contact. Pathways shall be considered potentially complete unless evidence can be provided to demonstrate that the chemical will not enter the medium or the receptor will not contact the medium, either directly or indirectly, now or in the future. A qualitative description of the magnitude, duration, and frequency of exposure for representative biological receptors, representing multiple trophic levels, should be provided for each contaminant and area of contamination. A tabular summary of the exposure pathway analysis for each habitat type, as depicted in Table 2, Appendix A, should be provided. Such an exposure pathway analysis is an expansion of the conceptual site model shown in Figure 2.1.

#### **2.6.4 QUALITATIVE SUMMARY**

A site-wide habitat map is required as part of the ecological screening. All major habitats should be displayed on a map equivalent to a USGS quadrangle map (1:25000). Separate indication of the coverage of tree canopy, shrubs, or dominant herbaceous plants may be appropriate. A site-wide map of similar dimension should indicate historical land use patterns, particularly those land uses which may have resulted in release of hazardous substances. Current land use which differs from historical land use should be indicated. Location of former landfills, waste piles, material stockpiles, burn pits, surface impoundments, firing ranges, strafing or bombing ranges, hazardous waste storage areas, reutilization areas, and surface drainages are especially important. Both the habitat coverage and the land use may be displayed on the same map if the degree of detail is not confusing. Additional smaller scale maps of portions of the site may be necessary, as appropriate, to adequately portray habitat-specific information. Industrial sites where future land use is industrial or commercial may not require smaller habitat-specific maps. Chemical concentration data can be overlaid if it can be presented clearly on the same map with sample locations and site use information. If chemical concentration data cannot be presented clearly on a map, then sample location identifiers should be provided which can be used to match concentrations presented in a table with sample locations on the map.

A qualitative statement should be provided which summarizes the findings of the screening-level ecological assessment. If the site is found to be impacted by COPCs, but no ecological risks are present because the site is not utilized by biota, wildlife habitats are not present, or there are no actual or potentially complete exposure pathways, this conclusion must be clearly stated and justified based on the information collected. Supporting documentation may include site photographs depicting the lack of habitat. If it

is determined that the potential for exposure to ecological receptors exists, further investigation and assessment may be warranted.

## **2.7 FAIR MARKET VALUE OF THE PROPERTY**

The AAI rule requires an evaluation of the relationship of the purchase price to the fair market value of the property, if the property was not contaminated. This includes making a comparison of price and fair market value and considers whether any differential is due to potential environmental contamination. The evaluation may be conducted by the prospective landowner, grantee, Environmental Professional conducting the inquiry, or another third party hired by the prospective land owner or grantee.

The AAI rule does not require that a real estate appraisal be conducted to meet this criterion. However, if a formal appraisal is conducted for other purposes, the results may serve as a source of information on the fair market value of the property. If a formal appraisal is not available, the determination of fair market value may be made by comparing the price paid for the particular property to prices paid for similar properties located in the same vicinity of the subject property, or by consulting with a qualified real estate expert. The objective is to determine whether the purchase price paid reflects the fair market value and not the exact value of the property. Any significant differences in the purchase price and the fair market value should be noted as well as any reasons for the differences.

If the information is not collected by the Environmental Professional or a person under their supervision or charge, the AAI rule does not require that the information collected and determination made be provided to the Environmental Professional. If the information is not provided, and it is determined that the lack of such information affects his or her ability to identify conditions indicative of releases or threatened releases of hazardous substances, then the Environmental Professional should identify the lack of information as a data gap and comment on its significance. DTSC recommends that this information be made available to the Environmental Professional to avoid creating a data gap.

## **2.8 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION**

Commonly known or reasonably ascertainable information about the property is a requirement of the AAI rule. Information about a property that is generally known to the public within the community where the property is located, and that can be easily sought and found from individuals familiar with the property or from easily attainable public sources of information must be collected and considered when conducting all appropriate inquiries. In many cases, this information may be incidental to other information collected and separate or distinct efforts to collect the information may not be necessary. Examples of sources of information include: current owners or occupants of neighboring properties; local and state government officials who may have knowledge or information related to the subject property; others with knowledge of the subject property; and other

sources of information (e.g., newspapers, websites, community organizations, local libraries, and historical societies).

## **CHAPTER THREE**

### **PREPARATION OF THE PEA REPORT**

This chapter provides guidance on how to organize the PEA report and what information should be included in the report. The purpose of the report is to document the results of the PEA investigation and screening evaluations and to recommend a course of action for the site.

#### **3.1 SUGGESTED REPORT FORMAT**

To provide consistency in documentation of PEA investigations, DTSC recommends use of the report format provided in Figure 3-1.

#### **3.2 SUGGESTED REPORT CONTENTS**

The specific information that is suggested to be included in the PEA report is discussed in the following sections. If any information cannot be obtained, a statement to that effect should be included in the report. If information is omitted because it seems irrelevant to the site, the rationale for this omission should be included in the report. Omission of information and rationale for omission are subject to approval by DTSC staff. If it is the intention of the Environmental Professional to include AAI requirements, it is the Environmental Professional's responsibility to ensure that all specific reporting requirements identified in 40 CFR §312.21 and §312.31 are included.

##### **3.2.1 EXECUTIVE SUMMARY**

The executive summary is a complete summary of the site. This section should inform the reader of all the major aspects of the site. Specifically, this section should include, but not be limited to, very brief descriptions of the following:

- Purpose and objectives of investigation;
- Site background and current status;
- Known and potential releases;
- Significant contamination;
- Pathways demonstrating potential threat;
- Potentially exposed populations; and
- Conclusions and recommendations.

## FIGURE 3- 1 SUGGESTED REPORT FORMAT

Title Page	
i.	Table of Contents
ii.	List of Figures
iii.	List of Tables
iv.	List of Appendices
Executive Summary	
I.	Introduction, purpose and objectives, scope of work Significant assumptions made Modifications or deviations from the final AAI rule Information obtained from the landowner or user (for AAI)
II.	Site Description
a.	Site Identification Information
b.	Site Geology and Hydrogeology
III.	Background
a.	Site status/historical site information
b.	Hazardous material/substance/waste Management information
c.	Current and historical use(s) of surrounding properties
d.	AAI required information
e.	Records review information
f.	Site reconnaissance
g.	Interviews
IV.	Apparent Problem
V.	Environmental Setting
a.	Conceptual Site Model
b.	Factors related to soil pathways
c.	Factors related to water pathways
d.	Factors related to air pathways
VI.	Sampling Activities and Results
a.	Summary of activities
b.	Presentation of data
c.	Discussion of results
VII.	Human Health Screening Evaluation
a.	Exposure pathways and media of concern
b.	Exposure concentrations and chemicals
c.	Human Health Screening Levels
d.	Toxicity values
e.	Risk characterization summary
VIII.	Ecological Screening Evaluation
a.	Site characterization
b.	Biological characterization
c.	Pathway assessment
d.	Qualitative Summary
IX.	Community Profile
X.	Opinion of Environmental Professional (required by AAI)
XI.	Conclusions and Recommendations
a.	Summary and conclusions
b.	Recommendations
c.	Data gaps (required by AAI)
d.	Preliminary scoping recommendations
XII.	References
XIII.	Signature(s) and qualifications of Environmental Professional(s), including statements required by AAI
XIV.	Supporting Documentation (Appendices)

### 3.2.2 INTRODUCTION

This section should briefly introduce the site and the organization of the report. In doing so, the Environmental Professional should provide the reason for performing the PEA investigation; the methodology used to complete the PEA; any significant assumptions made; the types and years of site operations; and the guidance documents followed during the investigation. For PEAs that include AAI requirements, any modifications or deviations from the final rule requirements should be discussed as well as information obtained from the landowner or user. The Environmental Professional and the person(s) who conducted the site reconnaissance and interviews should be identified.

### 3.2.3 SITE DESCRIPTION

The site description should include information that identifies the physical setting of the site in relation to the surrounding area.

#### 3.2.3.1 SITE IDENTIFICATION

The following information is recommended for inclusion in this section of the PEA report.

- 1) **Site Name:** Name of current business operation and/or land use at the site.
- 2) **Contact Person(s):** Name of the main contact person(s) for the above cited operation.
- 3) **Site Address:** Street address or nearest cross streets, city, state, county, and zip code.
- 4) **Mailing Address:** Mailing address for the site if different from the street address (e.g., post office (P.O.) box or offsite business).
- 5) **Phone Number:** Phone number of any onsite or offsite business office.
- 6) **Other Site Names:** Former or alternate names for the current and historical operations onsite.
- 7) **USEPA Identification Number:** Any current or previously assigned numbers.
- 8) **Property Location:** Describe the property location, including any site or nearby characteristics, and any ecological characterization features. Also describe any structures, roads, and site improvements. A site location map and a site-specific map (facility diagram) may be used to help describe these features. The site location map, with a suggested scale of 1:2400, should show the general location of the site relative to its surroundings. The site location map may identify major highways, surface waters, land use, sensitive populations and critical habitats. The site-specific map should include all significant site features (buildings, tanks, ponds, sumps, etc.) Maps depicting current and historical features should be drawn to a scale appropriate

for the site size. All maps should be oriented with north at the top of the page. Also provide the site's latitude and longitude in the geographic NAD83 coordination system and the site's elevation (vertical datum) in NAVD88.

### **3.2.3.2 SITE GEOLOGY AND HYDROGEOLOGY**

Summarize the site geology, including relevant information from published sources and observations made in the field. Discuss the geologic setting, stratigraphy, surface water hydrogeology, and subsurface hydrogeology. The level of detail may vary based on the nature of the impacts to the site. A more detailed description with respect to potential soil and groundwater pathways should be included in sections 3.3.6.2 and 3.3.6.3, described below.

### **3.2.4 BACKGROUND**

#### **3.2.4.1 SITE STATUS AND HISTORY**

Each data element below should be provided for all current and past business operations at the site.

- 1) **Business Type:** Identity and description of the types of businesses which are currently operating or have operated at the site in the past.
- 2) **Years of Operation:** Operating dates for each business identified.
- 3) **Prior Land Use:** Identity of the land use prior to development of the site (including the placement of fill upon the property).
- 4) **Facility Ownership/Operators:** Identity of all persons or corporations which owned and/or operated businesses on the site. Description of the organizational structure of the businesses (i.e., corporation, limited partnership, etc.). Names of operators, partners, and/or any person(s) having operational control of the facility. Description of the roles these persons/corporate officers played in the day-to-day operations at the site. Current street addresses, mailing addresses, and phone numbers for each person and/or corporation identified.
- 5) **Property Owners:** Narrative summary of the property ownership at the site extending back to the date of first business operations. The narrative should reference title documents and tax assessor parcel maps which should be included as appendices. The narrative should also include current contact information for all persons/corporations identified. If a title search was conducted include the document as an appendix to the PEA.

### 3.2.4.2 HAZARDOUS MATERIAL/SUBSTANCE/WASTE MANAGEMENT INFORMATION

The following information regarding hazardous material/substance/waste management activities for all current and former businesses that have operated on the property should be provided in the PEA report.

- 1) **Business/Manufacturing Activities:** Concise description of activities or manufacturing processes for each business currently and formerly operating onsite which utilized or generated hazardous materials/substances/wastes. Summary descriptions, diagrams, flow charts, and/or tables are preferable to long narrative descriptions. At a minimum the following information should be provided.
  - a) Type and approximate quantities of products produced/sold per year or the number of services rendered per year.
  - b) Amount/type of hazardous substances and/or wastes generated per year.
  - c) Primary materials and chemicals used, handled, or sold onsite.
  - d) Descriptive overview of the major physical/chemical processes used (e.g. mixing, distillation, combustion, oxidation, polymerization, etc.) for each process or activity.
- 2) **Onsite Storage, Treatment, and Disposal:** Concise description of waste/substance storage, treatment, and disposal practices for each business currently and formerly operating onsite. Summary descriptions, diagrams, flow charts, and/or tables are preferable to long narrative descriptions. At a minimum the following information should be provided.
  - a) Type, capacity, contents, and location of storage units (e.g., tanks, drum storage areas, sumps, pits, ponds, etc.).
  - b) Type, capacity, and location of treatment facilities (e.g., neutralization, filtration, distillation, incineration, etc.).
  - c) Onsite disposal practices (e.g. land disposal, land spreading, injection, etc.), including volumes of waste disposed.
  - d) Containment measures specific to each treatment, storage, and disposal unit onsite.
  - e) Waste recovery and/or recycling practices utilized onsite. Indicate volumes and types of wastes recovered/recycled annually.
  - f) Origin, types, and quantities of any substances/wastes from offsite sources treated, disposed, or stored on the site.



- g) Identification of all leaks, spills, releases or threats of releases of any substances at or from the site (into the environment or within onsite structures). Include when, how and where such releases occurred, and the volume and types of materials released.
- 3) **Regulatory Status:** The status of any federal, state, or local permits currently or previously held by the facility. Include effective dates of the permit(s) and specific permit requirements and conditions. Attach copies of the permits in the appendices of the PEA report.
- 4) **Prior Assessments/Remediation:** Identity, evaluation and summary of all assessments, sampling efforts and cleanup activities which have taken place at the site prior to the PEA.

### 3.2.4.3 CURRENT AND HISTORICAL USES OF SURROUNDING PROPERTIES

**Surrounding Land Use:** History and/or general uses of properties in the area surrounding the site should be researched to the extent to which the information is useful to determine the influence of surrounding property use(s) on the site.

### 3.2.4.4 AAI REQUIRED INFORMATION

Any additional information required by the AAI that is not identified as a component of the PEA should be included in this section. Examples of this type of information include fair market value of the property (Section 2.7) and commonly known or reasonably ascertainable information (Section 2.8).

### 3.2.4.5 RECORDS REVIEW

This section should summarize the information found during the records review.

- 1) **Land Records:** Records such as title records/chain of title documents, environmental liens, easements, recorded documents such as land use covenants (LUCs), engineering controls or institutional controls should be described. Also, describe current land use and zoning, and any proposed land use or zoning changes. If known, the type of allowable land uses associated with the zoning designations should be included. Identify the Assessor's Parcel Number for the site and include a copy of the County Assessor's plat map for the parcel(s) where the site is located. The corresponding Township, Range, Section, and Meridian for the site location should also be included.
- 2) **Aerial Photographs/Site Photographs:** The results of interpretation of aerial photographs with regard to identification of historical development or site activities at the property and at nearby areas (if applicable). If available, information obtained from photographs that document historical site activities.

- 3) **Fire Insurance Maps:** Information included on insurance maps indicating use of the property by specified dates.
- 4) **Other Historical Use Sources:** Summary of information obtained from other sources such as street directories, newspaper archives, etc.
- 5) **Federal, State, Tribal, and Local Records:** Summary of information obtained from records review or databases. Summarize significant findings of federal, state, or local inspections of current or past operations onsite. Include significant sampling results, scope and purpose of the inspection, and conclusions drawn by the inspector.
- 6) **Site Owner/Operator Records:** Summary of applicable information obtained from the site owner or site operator.

#### **3.2.4.6 SITE RECONNAISSANCE**

A section describing the methodology used to conduct the visual inspection of the subject property and adjoining properties should be included.

- 1) **Inspection:** Describe when the inspection was conducted and by whom.
- 2) **Physical Limitations:** Describe any physical limitations that prevent visual observation of the property (e.g., limited access, safety concerns, etc.)
- 2) **Interior Observations:** Describe observations made while inspecting interiors of structures or features.
- 3) **Exterior Observations:** Describe observations made while inspecting exterior portions of the property.
- 4) **Evidence of Release or Threatened Release:** Describe any observations made that might suggest a release or threatened release of hazardous substances/materials. Examples include: staining, spills, odors, stressed vegetation, corrosion, pools of liquid, discolored water, ground surface alterations, dead or ill wildlife, or other conditions.

#### **3.2.4.7 INTERVIEWS**

A summary of the interviews conducted should include a description of when the interview was conducted and with whom the interviews were conducted (e.g., current property owner and occupants, site manager, local/state/federal government officials, past site owners and occupants, etc.). The method used to conduct the interview (e.g., in person, written communications, telephone, etc.) should also be identified. If the property is abandoned, interviews with neighboring property owners should be summarized and, if applicable, interviews with past owners and occupants.

### **3.2.5 APPARENT PROBLEM**

This section should summarize the available information regarding known or potential sources of contamination which constitute the primary reason for investigating the site. The summary should include documentation of spills or releases (i.e., date, location, material, and quantities), identification of the contaminants of concern, identification of the primary human and environmental resources of concern, and a description of the exposure pathways. Detailed information related to the apparent problem should be described in subsequent sections of the report.

### **3.2.6 ENVIRONMENTAL SETTING**

During the background research, information should have been collected on the site's environmental characteristics. This information identifies the site environmental conditions which would influence the transport of contaminants from the source of contamination through identified potential exposure pathways to the exposed individual or environmental receptor. DTSC will use the information provided to prioritize those sites requiring remediation.

#### **3.2.6.1 CONCEPTUAL SITE MODEL**

Include the Conceptual Site Model (CSM) described in Section 2.1.2. The initial CSM should be updated based on information and data collected during preparation of the PEA.

#### **3.2.6.2 FACTORS RELATED TO SOIL PATHWAYS**

- 1) Describe the topography of the site and the surrounding areas.
- 2) Describe the predominant soil types at the site, using unified soil classification system (UCSC) terminology and site-specific geologic logs when available. Identify the least and most permeable continuous layers of soil and the permeability of each layer.
- 3) Describe the surface slope at the site. Also, provide the slope of any intervening terrain between the site and the nearest downhill surface water body. If the site is in a closed basin or is actually located in surface water, this fact should be stated.
- 4) Describe accessibility to the site in terms of both natural and man-made features or structures which currently restrict human access to the site.
- 5) Describe any measures which have been taken to contain or prevent direct contact with hazardous substances/materials in or on the soil at the site.

- 6) Provide the distance to and location of the nearest potentially affected residential area, school, business, day care center, nursing home, senior citizen community, and hospital (for facilities within one mile of the site).

### 3.2.6.3 FACTORS RELATED TO WATER PATHWAYS

The following information should be provided if a release or threatened release of hazardous substances/materials to water exists at the site.

- 1) Describe the hydrogeology beneath the site in terms of known aquifers or water-bearing zones, depths to aquifers, hydraulic conductivities, confining layers (i.e., aquitards or aquicludes), discontinuities, aquifer interconnections, and any other features of significance. Cite the professional geologist or professional civil engineer who presented this information.
- 2) Identify the aquifers (or water-bearing zones) which have been contaminated by a release from the site, or which are threatened to be contaminated as a result of migration of hazardous substances from a release at the site. Identify any aquifers which are connected to an aquifer that has been contaminated by a release from the site. Also identify if the site is located within a regional groundwater plume or describe nearby releases to groundwater that have or may have the potential to impact the site.

Potential data sources: sampling data; local water districts and utilities; county health departments; SWRCB Division of Drinking Water (DDW); Department of Water Resources (DWR); the local Regional Water Quality Control Board (RWQCB).

- 3) For each of the aquifers or water-bearing zones identified above, provide the following information for wells within a three-mile radius of the site:
  - a) The current use(s) of groundwater from wells that draw from the aquifer(s) (e.g., drinking water, irrigation, industrial process water, etc.).
  - b) The distances to the nearest well and nearest drinking water well that draws from the aquifer(s).
  - c) The direction and velocity of flow within the aquifer(s).
  - d) The approximate number of service connections and population served by drinking water wells from the aquifer(s).

Potential data sources: local water districts and utilities; county planning and health departments; local irrigation districts; SWRCB DDW; DWR; U.S. Geological Service (USGS); the local RWQCB.

- 4) Describe the possible migration route(s) from the areas of hazardous substance contamination and/or storage to nearby surface waters, marshlands, wetlands, or wildlife habitats in the event of surface water runoff or flooding.

Potential data sources: Personal observation; aerial photographs; USGS Maps.

- 5) Describe the locations and uses of surface waters, marshlands, wetlands, and wildlife habitats which may be potentially affected by migration of contaminants from the site. Provide the location and distance to the nearest surface water, marshland, wetland, and wildlife habitat which may be affected by migration of the contaminants. Also describe the relationship of the site to potential impacts from future sea level rise.

Potential data sources: USGS maps; other maps; California Department of Fish and Wildlife (DFW); local planning department; U.S. Bureau of Reclamation; State Water Resources Control Board (SWRCB); San Francisco Bay Conservation and Development Commission; California Coastal Commission.

- 6) Describe any past or existing measures for preventing or mitigating surface water runoff from the site (e.g., berms, diversion systems, diking, sealed containers for hazardous substances, runoff collection systems, etc.).

Potential data sources: Facility records; DTSC files; RWQCB files; other agencies.

- 7) Identify the approximate population served (number of people drinking water) by each surface water intake within three (stream) miles downstream of the probable point of entry of runoff from a site to a stream/river and one mile from the probable point of entry to a static body of water. Also identify the approximate number of acres of food/forage cropland irrigated by water from each intake and the approximate number of livestock or poultry which consume water from each intake.

Potential data sources: U.S. Census Bureau; local/regional planning or health departments; SWRCB DDW; local irrigation district; DWR.

- 8) Provide the approximate slope (in percentage) of the site and the intervening terrain between the site and any surface water which may potentially accept runoff.

#### **3.2.6.4 FACTORS RELATED TO AIR PATHWAYS**

Information for this section should be provided only if sampling data exist to document a release of a hazardous substance/material to the atmosphere or if the threat of a release exists. If there are data indicating an on-going release to the atmosphere, the local Air Quality Management District (AQMD) should be notified. If there is evidence that a hazardous substance/material has been historically released to the atmosphere or that a hazardous substance/material has been released to surface soil, the possibility exists that surface soil could be a reservoir for atmospheric contamination. Contaminated surface soils are subject to wind dispersal, evaporation, and dispersal from fire/explosion. If a release has been documented or a threatened release exists at the site, provide the following information.

- 1) Describe the known or potential sources(s) and mechanism for the release or threatened release.

Potential data sources: Site records; local AQMD.

- 2) Provide the daily prevailing wind direction and daily average wind velocity for the site.

Potential data sources: Local air district; local weather stations; National Oceanic and Atmospheric Administration (NOAA).

- 3) Describe local climatic factors (e.g., seasonal temperatures, seasonal precipitation, seasonal temperature inversions, seasonal wind patterns, and seasonal extreme events).

Potential data sources: Local AQMDs; local weather stations; NOAA.

- 4) Describe the timing of the release or threatened release (e.g., intermittent release related to facility operation, continuous release from an impoundment, potential release if heavy machines disturb soils, etc.).

Potential data sources: Facility records; local AQMDs.

- 5) Describe the possible dispersion route(s) for a release or threatened release (e.g., via a stack emission, evaporation, wind, fire/explosion, etc.).

Potential data sources: Local AQMDs; facility records.

- 6) Provide the approximate population of residents and workers which may be affected by a release or threatened release of hazardous substances/materials.

Potential data sources: U.S. Census Bureau; local/regional planning databases.

- 7) Provide the location and distance from the site to any of the following areas which may be impacted by a release or threatened release of hazardous substances/materials:

- Residential areas and schools;
- Commercial/industrial zones;
- National/state parks, forests, wildlife reserves;
- Agricultural lands (in production within five years) for both prime and non-prime agricultural land;
- Archeological and paleontological sites (California Public Resources Code § 5097.5); and,
- Cultural/historic/landmark sites.

Potential data sources: local planning departments; Department of Food and Agriculture; DWR; Department of Forestry; Department of Parks and Recreation; Native American Heritage Commission (HAHC); Office of Historic Preservation (OHP); maps.

8) If not previously indicated in other sections of the PEA report, provide the type, location, and distance from the release or threatened release of hazardous substances/materials to the following sensitive environments:

- Schools
- Day care centers
- Hospitals
- Nursing homes
- Retirement communities
- Locations of any other sensitive populations
- Coastal wetlands (within a two-mile radius);
- Fresh-water wetlands (within a one-mile radius);
- Habitat for special species (within a one-mile radius); and,
- National parks or preserves.

Potential data sources: local planning department, maps, DFW NDDDB, DWR, SWRCB, physical measurement.

### **3.2.7 SAMPLING ACTIVITIES AND RESULTS**

In the three subsections that follow, the report should summarize the sampling activities performed, present the analytical data, and provide a discussion of the results.

#### **3.2.7.1 SUMMARY OF ACTIVITIES**

The sampling plan provided a framework for field activities and allowed flexibility for some decisions to be made in the field. This section should describe the activities that were performed; document decisions made in the field; identify any deviations from the work plan; and provide explanations for any deviation.

#### **3.2.7.2 PRESENTATION OF DATA**

Use tables, charts, etc. to summarize the sample analysis results for each medium. At a minimum the information presented should include the chemical name, sample type, sample designation, sample location, sample depth (if appropriate), detection limit, units, and date collected. Analysis results as reported from the laboratory, including quality assurance/quality control (QA/QC) data, should be provided in an appendix to the report. Also include information regarding the handling of analytical samples from the time of collection until final analysis.

#### **3.2.7.3 DISCUSSION OF ANALYTICAL RESULTS**

Provide a summary of the conclusions reached upon evaluation of the analytical data. Identify unexpected or conflicting results, unusable data, and field and/or laboratory interferences and provide potential rationale. Appropriate figures or tables should be used to support the discussion. This section should also identify secondary analysis



performed to confirm original results that may have been questionable. Any hot spots, (i.e., areas of elevated concentrations), areas of special concern and/or separate areas of contamination present at the site should be discussed.

### **3.2.8 HUMAN HEALTH SCREENING EVALUATION**

The introduction to the human health screening evaluation should contain a brief summary of the information presented in the remainder of the section. The summary should introduce the four components of the human health screening evaluation: exposure pathways, exposure concentrations of chemicals of concern, toxicity values, and risk characterization.

#### **3.2.8.1 EXPOSURE PATHWAYS AND MEDIA OF CONCERN**

Refer to the conceptual site model (CSM) in Section 3.2.6.1 to show potentially complete exposure pathways (See Figure 2.1 for example). If there are several distinct areas of contamination, presentation of separate CSMs for each area may be necessary. If the pathways of exposure are the same for each area, then one CSM is sufficient; however, a statement to that fact should be included. A statement should be included supporting the approach that the default exposure pathways embedded in the screening levels, as described in Section 2.5.2.1, can be considered complete and reasonable to assume at the site.

#### **3.2.8.2 EXPOSURE CONCENTRATIONS AND CHEMICALS**

Include tables identifying the chemicals of concern, their physical constants, and the concentrations in each medium that were used as input for the screening evaluation (this should be displayed for each separate area of contamination). Every table should have a descriptive title name and the name of the potentially contaminated area it represents, if applicable. If the site has historic sampling data, significant results should be included in separate, chronological tables with each table clearly noting the sampling date. If there are large volumes of data, include only the significant findings in this section and include all other data in an appendix. Provide the rationale if a particular chemical is to be excluded from evaluation. All background data should be included in this section, with any suspected anomalies noted. A table can be used to compare metals found on site with local background levels. A table may be included comparing ambient levels for selected organic chemicals, if appropriate.

#### **3.2.8.3 HUMAN HEALTH SCREENING LEVELS**

Include a table of the human health screening levels for residential land use used to perform the human health screening evaluation. This table should include the source of the screening level, the units of measurement, and the environmental medium to which the screening level should be compared. The environmental media to be considered are soil, soil vapor, groundwater, and surface water (if used as a drinking water source). Screening levels for soil are generally the USEPA RSLs with modifications described in

the most current DTSC HHRA Note 3<sup>71</sup>. The source of screening levels for groundwater for risk evaluation may be the USEPA tap water RSLs or the California Public Health Goals (PHGs). California Maximum Contaminant Levels (MCLs) and water quality objectives of basin plans are not all strictly risk-based, but they may be potential requirements for site cleanup. Screening levels for indoor air are the air RSLs, which are compared to indoor air levels calculated from soil vapor and/or groundwater concentrations as described in Sections 2.5.4.5.3 and 2.5.4.5.4. The units of measurement are mg/kg for soil, mg/m<sup>3</sup> or µg/m<sup>3</sup> for soil gas and indoor air, and µg/L or mg/L for groundwater. The table should identify each chemical as being evaluated as a carcinogen, non-carcinogen, or both.

### 3.2.8.4 TOXICITY VALUES

Toxicity values are embedded in the derivation of the screening levels for specific chemicals. If screening levels are not used in the human health screening evaluation, and the equations based on the USEPA *Risk Assessment Guidance for Superfund (RAGS)* are used instead, as described in Section 2.5.4, each chemical of concern should have all relevant and significant human toxicity information described. This should include a summary table with the cancer potency factor, reference dose and reference concentration for each chemical of concern, and for each route of exposure. The table should cite the source and date of the toxicity values (e.g., Cal/EPA, USEPA). Toxicity data for each route can be displayed in a table. This section should clearly indicate which toxicity values are based on cross-route extrapolation.

### 3.2.8.5 RISK CHARACTERIZATION SUMMARY

Include two tables comparing the maximum concentration of each chemical of concern to its appropriate screening level, as described in Section 2.5.3. One table should list the comparison of chemicals considered carcinogens, and the other table should list the comparison of chemicals considered non-carcinogens. The summed ratio for carcinogens, multiplied by 10<sup>-6</sup>, should be included in the carcinogenic chemicals table representing the cumulative risk from all carcinogens detected at the site. The summed ratio for non-carcinogens representing the cumulative HI for the site should be included on the non-carcinogens table. Conclusions regarding the screening evaluation determination should be provided in this summary.

The risk and hazard estimates which result from application of this screening evaluation do not represent absolute estimates at a specific site, because generic assumptions for residential land use are used. The information provided for the PEA screening evaluation is often based on limited sampling information. The goal of the PEA screening evaluation is to ensure that no potential health hazard is overlooked; therefore, the screening evaluation's assumptions and default values are restricted to a reasonable maximum exposure (RME) scenario.

---

<sup>71</sup> DTSC Human Health Risk resources page contains Note 3. Web site. <http://www.dtsc.ca.gov/AssessingRisk/humanrisk2.cfm#guidance>

### **3.2.9 ECOLOGICAL SCREENING EVALUATION**

The introduction to the ecological risk assessment should contain a summary of the information presented in this section of the PEA Report.

#### **3.2.9.1 SITE CHARACTERIZATION**

Identify the chemicals of ecological concern to biota and provide information on habitat-specificity of contamination.

#### **3.2.9.2 BIOLOGICAL CHARACTERIZATION**

List and describe all wildlife habitats potentially affected by the site. The nature of the habitat should be detailed including cyclic changes. The rationale for excluding any nearby wildlife habitat from evaluation should be provided.

List all special species potentially affected by the site and identify any endangered or special status species. State if any of these species have been observed on the site. Note if a species is particularly sensitive to any chemicals of concern found on site.

Persons performing biological surveys should be identified, along with their credentials.

#### **3.2.9.3 PATHWAY ASSESSMENT**

Describe the onsite contamination and the exposure pathways for which there may be contact between biota and chemicals of concern in any medium. Use a CSM to illustrate general potential exposure pathways, then a more detailed exposure pathway analysis table can be used for each habitat. Include a discussion on whether this exposure is onsite or offsite and describe the potentially affected species. Any past documented or observed impacts to wildlife habitats or special species from the site should be described in this section. Also, describe any interim remedial measures that may abate potential impacts to the environment from the chemicals of concern.

#### **3.2.9.4 QUALITATIVE SUMMARY**

Provide a qualitative description of the magnitude, duration, and frequency of exposure for the various biological receptors, representing multiple trophic levels, for each contaminant and area of contamination. A site-wide habitat map and maps showing historical and current land use should be included. Conclusions regarding current or potential environmental impacts should be included. If the site contamination does not affect biota, a qualitative statement to that effect and supporting rationale should be provided. If the site contamination has the potential or can be reasonably assumed to affect wildlife or wildlife habitats onsite or offsite, further investigation and assessment may be necessary.

### **3.2.10 COMMUNITY PROFILE**

This section should be a summary of the public participation activities conducted as part of the PEA investigation. The summary should highlight the assessment of community concerns and the public participation actions taken. Also, include any recommendations for future public participation activities, if any.

### **3.2.11 OPINION OF ENVIRONMENTAL PROFESSIONAL (REQUIRED BY AAI)**

For PEAs that include AAI requirements, the Environmental Professional's opinion(s) as to whether the inquiry identified conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to the subject property must be included (see final rule at 40 CFR §312.21(c)(1)). The Environmental Professional also must include an opinion regarding additional appropriate investigation to detect the presence of contamination at the property, if the Environmental Professional has such an opinion.

### **3.2.12 CONCLUSIONS AND RECOMMENDATIONS**

#### **3.2.12.1 SUMMARY AND CONCLUSIONS**

The conclusions of the PEA report need to address three main questions:

- Have current or past practices of handling hazardous waste/substances/materials resulted in a release or threat of release at the site?
- If a release has occurred or a threatened release exists, does it pose a significant threat to public health or the environment?
- Does the release pose an immediate potential hazard to public health or the environment which would require the implementation of an expedited response action?

In answering the above questions, the conclusions should be specific, concise, and supported by information presented in the body of the report. All conclusions presented in this section must be consistent with the data and analysis presented elsewhere in the PEA report.

If a release or threatened release does not exist, this section should include a statement to that effect and reference the information contained in the body of the report which supports the statement.

#### **3.2.12.2 RECOMMENDATIONS**

Based on the conclusions presented in the previous section, the Environmental Professional will make a recommendation(s) regarding the need for further action at the

site. In its simplest form the recommendation will either be "no further action (NFA)" or "additional action required".

A NFA recommendation can be made in cases when no release of hazardous substances/materials has occurred and in cases when levels of contamination are determined to be insignificant. Any recommendations for NFA at sites where a release has been documented must be supported by information provided in the human health and environmental threat evaluation portion of the report. If the human health and environmental threat evaluation is based upon exposure scenarios other than an unrestricted use, restrictions on the use of the property should be discussed with the DTSC project manager.

At sites with significant contamination, a recommendation for further action to investigate or remediate the site must be made. This recommendation should not simply state that "further action is required". The recommendation should identify additional investigation and/or remediation needs and strategies to address them.

In addition to the recommendations above for long term actions, this section must include recommendations for expedited response actions necessary to mitigate any immediate potential hazards to public health or the environment. These actions can take a number of forms, including but not limited to: removing highly contaminated soils to prevent further migration; placing a polymer coating onto soils to prevent dispersion and runoff; placing a fence and warning signs around contaminated areas to prevent direct contact; and/or providing alternative drinking water sources to residents near sites where drinking water supplies are contaminated. When determining if expedited response actions are required, consider the following:

- Does the site have unrestricted access?
- Are there hazardous substances in surface impoundments, unsealed or improper containers, piles, leaking tanks, or other unapproved storage?
- Have the substances been spilled on the ground or other surfaces accessible to humans or animals?
- Does the toxicity of the hazardous substances at the site pose an immediate public health or environmental endangerment?
- Are unsafe levels of soil vapor migrating or have the potential to migrate into indoor air?
- What is the most immediate exposure threat facing nearby populations?
- How many people live or work around the site and what is the distance of that population from the site?

- Is there a confirmed instance in which exposure to hazardous substances/materials at a site has caused injury, illness, or death to humans, domestic or wild animals, or plants?
- Can it reasonably be inferred from the geology and hydrology of the site and surrounding area and the nature of the contaminants that there is the potential for offsite migration?
- Is there evidence of offsite migration?
- Are there active wells in the suspected pathway of migration?
- Is there a potential for the contaminant to become airborne?
- Can a reasonable inference be made that taking an immediate action could significantly reduce continued or potential hazardous substance migration from the site through air emissions, surface water runoff, groundwater migration, or subsurface gas migration?

### **3.2.12.3 DATA GAPS (REQUIRED BY AAI)**

As required in 40 CFR §312.21(c)(2) of the final rule, the report should document and discuss significant data gaps that affect the ability of the Environmental Professional to identify conditions indicative of releases or threatened releases.

### **3.2.12.4 PRELIMINARY SCOPING RECOMMENDATIONS**

For sites that will continue in the cleanup process, the next step after completing the PEA is the Remedial Investigation/Feasibility Study (RI/FS). The RI is conducted to characterize the full extent of contamination at the site and to obtain information needed to identify, evaluate, and select cleanup alternatives. The FS includes an analysis of remediation alternatives based on the nine National Contingency Plan evaluation criteria (USEPA, 1988).

The first step of the RI/FS is the planning or scoping of the project to focus activities and streamline the process, thereby preventing needless expenditures and loss of time in unnecessary sampling and analysis. Ideally, all sites requiring further action would begin the RI/FS immediately upon completion of the PEA. This section includes steps to scope the RI/FS upon completion of the PEA. These steps will serve to identify potential data gaps, keep information on site conditions current, and help establish priorities for future remedial actions. Upon approval of the PEA report, the parties responsible for the site should initiate the implementation of the scoping activities identified in the report.

Specific activities that may be conducted during project scoping include:

- Evaluating the PEA data to update the CSM and identify data gaps.

- Initiating limited field investigations if available data are inadequate to develop an updated CSM and adequately scope the project. An example of limited field investigation would be installation of monitoring wells and/or collecting samples from existing wells on a quarterly basis to monitor for the chemicals of concern or conduct hydrological studies.
- Identifying preliminary remedial action objectives (RAOs) and likely response actions for the specific projects, including presumptive remedies. This may include identifying the need and a schedule for treatability studies to better evaluate potential remedial alternatives.
- Conducting treatability studies identified in scoping.

Full project scoping activities can be found in the USEPA's *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (USEPA, 1988). Potential scoping needs applicable to baseline risk assessment data collection can be found in USEPA's *Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual (Part A)* (USEPA, 1989a). DTSC's Proven Technologies and Remedies documents are also available and are designed to help streamline remedy selection and site cleanup while ensuring full protection of public health, safety and the environment without diminishing public input. These documents are available on DTSC's web site at <https://dtsc.ca.gov/proven-technologies-remedies-documents/>, and are intended to be one of many options that may be used in the cleanup process and are not necessarily applicable to every site.

### **3.2.13 SIGNATURE(S) AND QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL(S), INCLUDING STATEMENTS (REQUIRED BY AAI)**

Geologic or engineering plans, specifications, drawings, and reports must be prepared by, or under the direct supervision of a California professional geologist or civil engineer, as appropriate, who will review and sign all such documents indicating responsibility for their content. The signature(s) of the Environmental Professional(s) and the statements as required by 40 CFR §312.21(d) need to be included if an AAI is being conducted.

## GLOSSARY

**CALIFORNIA HUMAN HEALTH SCREENING LEVELS (CHHSLs).** CHHSLs were developed by the Cal/EPA Office of Environmental Health Hazard Assessment (OEHHA) in 2005 using California toxicity criteria, assuming default exposure pathways and default conservative exposure parameters. CHHSLs are not generally recommended for use in a PEA evaluation, because they are not reviewed and revised on a regular basis. Consult with a DTSC toxicologist for further information.

**COMMUNITY ASSESSMENT.** A series of interviews with local community members which will aid in characterizing and determining the informational needs and desires of the community.

**COMMUNITY PROFILE.** A written presentation of information gathered through the community assessment regarding community concerns that form the basis for determining public notification and public participation needs.

**CONCEPTUAL SITE MODEL (CSM).** A "model" of a site developed at scoping using readily available information. In its simplest form, the CSM identifies all potential or suspected sources of contamination, types and concentrations of contaminants detected at the site, potentially contaminated media, and potential exposure pathways, including receptors.

**EXPEDITED RESPONSE ACTION.** A removal action which occurs during or soon after the site evaluation phase. These removals generally consist of removing leaking drums/tanks, fencing the site, and placing caps of protective covering over known areas of contamination. Also known as: interim remedial measures (IRMs), time-critical removal actions (TCRAs), or non-time-critical removal actions.

**EXPOSURE POINT.** A location of potential contact between an organism (or receptor) and a chemical or physical agent. (USEPA, 1991)

**EXPOSURE ROUTE.** The way a chemical or physical agent comes in contact with an organism (i.e., by ingestion, inhalation, dermal contact). (USEPA, 1991)

**FIELD DUPLICATES.** Independent samples which are collected as close as possible to the same point in space and time. They are two separate samples taken from the same source, stored in separate containers, and analyzed independently. These duplicates are useful in documenting the precision of the sampling process. (USEPA, 1986)

**HAZARD INDEX (HI).** The sum of two or more hazard quotients (HQs) for multiple substances and/or multiple exposure pathways. (USEPA, 1991)

**HAZARD QUOTIENT (HQ).** The ratio of a single substance exposure level over a specified time period to a reference dose for that substance derived from a similar exposure period. (USEPA, 1991)



**INHALATION UNIT RISK (IUR).** The upper-bound excess lifetime cancer risk estimated to result from continuous exposure to an agent at a concentration of 1  $\mu\text{g}/\text{m}^3$  in air.

**QUANTITATION LIMIT.** The lowest level at which a chemical can be accurately and reproducibly quantitated. Usually equal to the instrument detection limit multiplied by a factor of three to five, but varies for different chemicals and different samples. (USEPA, 1991)

**REFERENCE CONCENTRATION (RfC).** An estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of adverse non-cancer effects during a lifetime. Expressed as a concentration of contaminant in air ( $\text{mg}/\text{m}^3$ ). (Adapted from IRIS database)

**REFERENCE DOSE (RfD).** An estimate (with uncertainty spanning perhaps an order of magnitude) of a daily exposure to the human population (including sensitive subgroups) that is likely to be without appreciable risk of adverse non-cancer effects during a lifetime. Expressed in  $\text{mg}/\text{kg}$  of body weight per day. (Adapted from IRIS database)

**REGIONAL SCREENING LEVELS (RSLs).** Initial screening levels that are protective of human health. RSLs are used in the screening level human health evaluation. RSLs were developed by the USEPA using toxicity criteria derived by the USEPA, assuming default exposure pathways and default conservative exposure parameters. They are reviewed and revised at least twice a year.

**REMEDIAL ACTION.** (a) Those actions which are consistent with a permanent remedy, that are taken instead of, or in addition to, removal actions in the event of a release or threatened release of a hazardous substance into the environment. (Adapted from California Health and Safety Code, Division 20, Chapter 6.8)  
(b) Those actions which are necessary to monitor, assess, and evaluate a release or a threatened release of a hazardous substance. (Adapted from California Health and Safety Code, Division 20, Chapter 6.8)

**REMOVAL (ACTION).** Includes the cleanup or removal of released hazardous substances from the environment or the taking of other actions as may be necessary to prevent, minimize, or mitigate damage which may otherwise result from a release or threatened release. (Adapted from California Health and Safety Code, Division 20, Chapter 6.8)

**SLOPE FACTOR (SF).** A plausible upper-bound estimate of the probability of a response per unit intake of a chemical over a lifetime. The slope factor is used to estimate an upper-bound probability of an individual developing cancer as a result of a lifetime of exposure at a particular level of a potential carcinogen. (USEPA, 1991)

**SPLIT SAMPLES.** Aliquots of a sample taken from the same container and analyzed independently. These are usually taken after homogenizing the sample and are used to document intra- or inter-laboratory precision. (USEPA, 1986)

**VADOSE ZONE.** The unsaturated zone between the land surface and the water table.

## REFERENCES

- Agency for Toxic Substances and Disease Registry. 2001. *Landfill Gas Primer, An Overview for Environmental Health Professionals*. November.
- Airola. 1988. *Guide to the California Wildlife Habitat Relationship System*. California Interagency Wildlife Task Group, D. Zeiner WHR Coordinator, 1701 Nimbus Road, Suite D, Rancho Cordova, California 95670.
- California Department of Health Services, Toxic Substances Control Program, 1990. *Interim Guidance for Preparation of a Preliminary Endangerment Assessment*. June 22.
- California Environmental Protection Agency (Cal/EPA). 2005. *Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties*. January.
- Cal/EPA. 2008. *Representative Sampling of Groundwater for Hazardous Substances, Guidance Manual for Groundwater Investigations*. Revised February.
- Cal/EPA. 2013. *Drilling, Logging, and Sampling at Contaminated Sites*. DTSC. June.
- Cal/EPA. 2015. *Advisory – Active Soil Gas Investigations*. July.
- Department of Toxic Substances Control (DTSC). 1997. *Selecting Inorganic Constituents as Chemicals of Potential Concern at Risk Assessments at Hazardous Waste Sites and Permitted Facilities, Final Policy*. February.
- DTSC. 1999. *Abandoned Mine Lands Preliminary Endangerment Assessment Handbook*. Second Printing February.
- DTSC. 2001. *Public Participation Manual*. Revised October.
- DTSC. 2008. *Proven Technologies and Remedies Guidance Remediation of Metals in Soil*. August.
- DTSC. 2009. *Arsenic Strategies, Determination of Arsenic Remediation, Development of Arsenic Cleanup Goals*. January.
- DTSC. 2011. *Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*. October.
- DTSC. 2012. *Evaluation of Biogenic Methane, A Guidance Prepared for the Evaluation of Biogenic Methane in Constructed Fills and Dairy Sites*. March 28.
- DTSC. 2015. *Office of Human and Ecological Risk (HERO) Human Health Risk Assessment Note No. 3*. September.

Mayer, K. E., and Laudenslayer, W. F., Jr. 1988. *A Guide to the Wildlife Habitats of California*. California Interagency Wildlife Task Group, D. Zeiner WHR Coordinator, 1701 Nimbus Road, Suite D, Rancho Cordova, California 95670.

Massachusetts Department of Environmental Protection. 2002. *Characterizing Risks Posed by Petroleum Contaminated Sites: Implementation of the MADEP VPH/EPH Approach*. Final Policy. October 31.

Office of Environmental Health Hazard Assessment (OEHHA). 2003. *Air Toxics Hot Spots Program Guidance Manual For Preparation of Health Risk Assessments*. August.

OEHHA. 2005. *Human-Exposure-Based Screening Numbers Developed to Aid Estimation of Cleanup Costs for Contaminated Soil*, January.

OEHHA. 2009. *Revised California Human Health Screening Levels for Lead*. September.

South Coast Air Quality Management District (SCAQMD). 1988. *Multi-Pathway Health Risk Assessment Input Parameters Guidance Document*. Prepared by Clement Associates, Inc., for SCAQMD

United States Environmental Protection Agency (USEPA). 1986. "Sampling Plan". Chapter 9. In *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW 846). Office of Solid Waste and Emergency Response, Washington, D.C.

USEPA. 1988. *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*. EPA-540/G-89/004. Office of Emergency and Remedial Response. October.

USEPA. 1989a. *Human Health Evaluation Manual (Part A). Volume 1. Risk Assessment Guidance for Superfund*. EPA-540/1-89/043. Office of Emergency and Remedial Response. December.

USEPA. 1989b. *Environmental Evaluation Manual. Volume II. Risk Assessment Guidance for Superfund*. Interim Final. EPA 540/1-89/001. Office of Emergency and Remedial Response. March.

USEPA. 1991. *Human Health Evaluation Manual (Part B, Development of Risk-based Preliminary Remediation Goals), Volume 1. Risk Assessment Guidance for Superfund*. Interim Final. Publication 92857.01B Office of Emergency and Remedial Response. October.

USEPA, 1992. *Interim Report Dermal Exposure Assessment: Principles and Applications*. EPA/600/8-0 011. January.

USEPA. 1996. *Soil Screening Guidance: User's Guide, Second Edition*, July.

USEPA. 2009. *PRP Search Manual*. EPA 330-K-09-001 September.

Van den Berg, M. et al. 2006. *The 2005 World Health Organization Reevaluation of Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-Like Compounds*. *Toxicological Sciences* 93(2):223-241.

Wester, R. C., et al. 1990a. "Percutaneous Absorption of [<sup>14</sup>C]DDT and [<sup>14</sup>C]Benzo[a]pyrene from Soil". *Fundamental Applied Toxicology*, 15:510-516.

Wester, R. C., et al. 1992a. "Percutaneous Absorption of [<sup>14</sup>C]Chlordane from Soil". *Journal of Toxicology and Environmental Health*, 35:269-277.

Wester, R. C., et al. 1992b. "*In Vitro* Percutaneous Absorption of Cadmium from Water and Soil into Human Skin". *Fundamental and Applied Toxicology*, 19:1-5.

Wester, R. C., et al. 1993a. "*In Vivo* and *In Vitro* Percutaneous Absorption and Skin Decontamination of Arsenic from Water and Soil". *Fundamental and Applied Toxicology*, 20:336-340.

Wester, R. C., et al. 1993b. "Percutaneous Absorption of Pentachlorophenol from Soil". *Fundamental and Applied Toxicology*, 20:68-71.

Wester, R. C., et al. 1993c. "Percutaneous Absorption of PCBs from Soil: *In Vivo* Rhesus Monkey, *In Vitro* Human Skin, and binding to Powdered Human Stratum Corneum". *Journal of Toxicology and Environmental Health*, 39:375-382.

Zeiner, D., Laudenslayer, W.F.Jr., and Mayer, K.E. 1991. *California's Wildlife*. Volumes I through III. California Interagency Wildlife Task Group, D.Zeiner WHR Coordinator, 1701 Nimbus Road, Suite D, Rancho Cordova, California 95670.

# **APPENDIX A**

**TABLE 1 SCREENING LEVEL DERMAL ABSORPTION FRACTIONS (ABS) FROM SOIL**

<b>Compound Class</b>	<b>Absorption Fraction<sup>1</sup></b>	<b>References</b>
<b>Chlorinated Insecticides</b>	<b>0.05</b>	<b>Wester, et al., 1990a; Wester, et al., 1992a</b>
<b>Polynuclear Aromatic Hydrocarbons</b>	<b>0.15</b>	<b>Wester, et al., 1990a</b>
<b>Organophosphates</b>	<b>0.25</b>	<b>Cal/EPA Office of Environmental Health Hazard Assessment</b>
<b>Pentachlorophenol</b>	<b>0.25</b>	<b>Wester, et al., 1993b</b>
<b>Polychlorinated Dibenzo-p-dioxins and Dibenzofurans</b>	<b>0.03</b>	<b>USEPA, 1992</b>
<b>Polychlorinated Biphenyls (PCB)</b>	<b>0.15</b>	<b>Wester, et al., 1993c</b>
<b>Other Organic Chemicals</b>	<b>0.10</b>	<b>SCAQMD, 1988</b>
<b>Cadmium</b>	<b>0.001</b>	<b>Wester, et al., 1992b</b>
<b>Arsenic</b>	<b>0.03</b>	<b>Wester, et al., 1993a</b>
<b>Hexavalent Chromium</b>	<b>0%</b>	<b>Not shown to be a systemic carcinogen via dermal exposure</b>
<b>Other metals and complexed cyanides</b>	<b>0.01</b>	<b>SCAQMD, 1988</b>
<b>Free Cyanide</b>	<b>0.10</b>	<b>SCAQMD, 1988</b>

1. Dermal absorption values from soil are based on, in order of preference: *in vivo*, animal studies on dermal absorption from soil; *in vivo*, animal studies on dermal absorption from an applicable cosolvent; *in vitro*, human skin dermal absorption studies; *in vitro* animal skin dermal absorption studies. Actual dermal absorption from soil may vary from these estimates due to exposure conditions or soil characteristics which differ from the experimental conditions.

**TABLE 2 SAMPLE EXPOSURE PATHWAY ANALYSIS FOR AN ECOLOGICAL SCREENING EVALUATION**

Habitat Type <sup>1</sup>	Potential Contaminants or Classes of Contaminants of Concern <sup>2</sup>	Contaminated Media <sup>3</sup>	Food Web Exposure <sup>4</sup>	Potential Exposure Pathway <sup>5</sup>	Complete Exposure Pathway
Chaparral	DDT	Soil		Direct Ingestion	Yes
	DDT	Soil	Invertebrates to Mouse	Ingestion of Prey	Yes
	Chloroform	Groundwater		Inhalation of Soil Gases	Yes
	Chloroform	Groundwater		Direct Ingestion	No

<sup>1</sup> Examples of habitat types include freshwater wetland, conifer forest, oak woodland and riparian.

<sup>2</sup> Indicate the specific chemical or family of chemicals, based on potential significance to the risk assessment. Physical or chemical properties such as volatility, bioaccumulative potential, tendency to sorb to soils or sediments and water solubility may be important.

<sup>3</sup> Indicate the food web transfers for those indirect exposures through the food web.

<sup>4</sup> Indicate the potential exposure pathway such as inhalation of volatile compounds from surface or subsurface contamination, incidental soil or sediment ingestion, ingestion of contaminated food items, or dermal contact with contaminated media.

<sup>5</sup> Indicate whether the potential exposure pathway is complete given site-specific characteristics.