



1601 Blake Street, Suite 200
Denver, Colorado 80202
Phone: 303.572.0200
Fax: 303.226.7878
matrixdesigngroup.com

July 12, 2013
REVISED June 19, 2015

This document incorporates responses to ADEM comments and supersedes the previous submittal of the letter in its entirety. The attachments associated with the April 24, 2015 submittal have not been changed.

Mr. Stephen A. Cobb, Chief
c/o Mrs. Brandi Little
Governmental Hazardous Waste Branch Land Division
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, Alabama 36130-1463

Via Email
Original to Follow by Mail

SUBJECT: Risk Management Plan, Revision 4 – Calculation of Risk Management-1 Risk-Based Target Levels to meet Alabama Risk-Based Corrective Action Guidance, McClellan, Anniston, Alabama

Dear Mr. Cobb:

The Alabama Department of Environmental Management (ADEM or Department) issued a series of informal comments from November 28, 2012 through March 1, 2013 to the McClellan Development Authority (MDA) regarding the Covenant associated with the Former Chemical Laundry and Motor Pool Area 1500, Parcel 94(7) (Chemical Laundry). An additional informal comment was provided on June 5, 2015. The purpose of this letter is to address questions related to the risk-based target levels (RBTLs) used to evaluate detected concentrations of compounds at McClellan.

Matrix Environmental Services, L.L.C. (MES) has calculated Risk Management-1 (RM-1) RBTLs in accordance with Alabama Risk-Based Corrective Action (ARBCA) Guidance Manual, Revision 2 (April 2008) on behalf of the MDA to meet the Department's request. Additionally, ADEM provided formal comments dated:

- August 22, 2013
- November 24, 2014
- Conference call conducted on April 9, 2015
- May 19, 2014
- April 2, 2015

Existing Clean-Up Levels

Per guidance provided by ADEM via email on January 22, 2013, MES intends to use the Clean-Up Standards shown in the existing ADEM-approved Corrective Measures Implementation Plans (CMI Plans) associated with each of the following sites:

- Former Small Weapons Repair Shop, Parcel 66(7)
- Training Area T-6 (Naylor Field), Parcel 183(6) and Cane Creek Training Area, Parcel 510(7)
- Landfill 3, Parcel 80(6) and Fill Area Northwest of Reilly Airfield, Parcel 229(7).

Therefore, **Table V.3 Groundwater Protection Standard** shown in the Cleanup Agreement AL4 210 020 562 (CA) will remain as is for the constituents associated with the above parcels. MDA acknowledges that if a clean-up level is greater than the unrestricted residential clean-up level defined in ARBCA a covenant will remain in place.

Notes and Decision Inputs Used for the Development of RBTLs

The following notes are made related to the calculation of RBTLs. These RBTLs will be applicable for sites without a currently approved CMI Plan.

- RBTL categories were expanded from ARBCA to include a mutagenic mode of action RBTL for the pathways involving receptors under 16 years of age, specifically the Child Resident and Adolescent Trespasser (Recreational User). Vinyl chloride is evaluated separately and was calculated manually with inputs from the EPA Regional Screening Level calculator. Mutagenic RBTLs were not required to be calculated for worker pathways because mutagenic adjustments are not applicable to adult receptors.
- No groundwater RBTLs were calculated for the Trespasser (Recreational User) or the Construction Worker as these receptors will not use Site groundwater.
- RBTLs for soil and sediment for the Trespasser (Recreational User) are the same, as the RM-1-specified exposure assumptions are the same.
- The inhalation pathway (volatilization into air while bathing) was only included for chemicals identified as Volatile Organic Compounds (VOCs).
- Inhalation RBTLs were calculated using the updated EPA methodology per USEPA Risk Assessment Guidance for Superfund (RAGS) Part F. These calculations differ slightly from those presented in the ARBCA guidance, as they do not include terms for inhalation rates or body weights.
- The permeability constants from the RSL tables dated May 2014 have been incorporated into the RBTL calculations.
- Groundwater RBTLs that are below promulgated MCLs will not be used as remediation goals. The proposed clean-up standard will be the MCL where one exists.
- Trichloroethylene (TCE) RBTLs were developed using the chemical-specific mutagenic equations. As noted above, because the proposed groundwater clean-up standard will default up to the MCL, the modified calculations would not affect groundwater remedial actions based on TCE.
- Per the informal comments received on February 20, 2013 and March 1, 2013, vapor intrusion scenarios should be included in the calculation of RBTLs. However, calculation

of these RBTLs would be based on many assumptions and unknown conditions. As an example, MDA does not have a means in which to predict the timeline for construction of buildings nor the concentrations of contaminants at the time of construction. Based on a discussion with ADEM on April 8, 2014, potential future vapor intrusion into structures to be built on the site will be managed on a site-specific basis. Land use controls will be used to manage potential vapor intrusion, as appropriate. Therefore, RBTLs assuming uncontrolled conditions have not been calculated.

- Per the informal comments received on December 18, 2012:
 - o Showering times used for adult and child receptors under a reasonable maximum exposure scenario was 0.58 hr and 1 hour, respectively.
 - o Dermal exposure to VOCs in water while bathing follows RAGS, Part E.
 - o Age dependent adjustment factors and age-specific exposure estimates as required by EPA in the RSL equations were used for mutagenic chemical compounds, including vinyl chloride.
- Exposure via inhalation of particulates for residents and trespassers is negligible compared with other soil exposures due to the low particulate volatilization factor (VFp).
 - o As an example, a comparison was made between the total quantity of soil a child would be exposed to both the ingestion and dust inhalation pathways.

Ingestion:	200 mg/day (ADEM default)
Inhalation:	Calculated with ADEM defaults 9.76×10^{-12} kg soil/m ³ air x 10 hr/day x 0.5 m ³ /hr x 10 ⁶ mg soil/kg soil = 0.000049 mg/day
- Per the informal comment received on June 5, 2015, the final potential remedies for each site will be evaluated in the context of the total risks to ensure that the overall risk target of 1E-05 has been met for each potential receptor. A similar approach will be taken for total hazard, which must not exceed 1.0. However, unlike cancer risk, noncarcinogenic hazards may be evaluated separately for each target organ, with a total target Hazard Index of 1.0 for each organ system (in accordance with USEPA guidance and ARBCA Section 2.7).

Receptor Scenarios and Conceptual Site Model

Attachment 4 contains the Site-Wide Conceptual Site Exposure Model prepared in accordance with RAGS. Attachment 4 also contains Table 1 as well as Tables 4-1 through 4-6 as presented in RAGS, Part D, which outline the media, receptors and exposure pathways where RBTLs were calculated.

MDA notes that the fish ingestion pathway for the Adolescent Trespasser may potentially be complete. Due to the complexity of the decision inputs, this evaluation will be performed on a site-specific basis, as necessary.

An electronic copy of this document has been provided to Mrs. Brandi Little via e-mail and two hard copies will follow by mail. It has been a pleasure working with you on this program. Please contact me at (256) 847-0780 (Anniston) or (770) 594-0331 (Atlanta) should you have any questions or comments.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC



Richard Satkin, P.G.

McClellan Program Manager

Enclosures: Attachment 1: Risk Algorithms (Formerly called Attachment C)
Attachment 2: Risk-Based Target Levels
Table 1. Groundwater RBTLs
Table 2. Soil RBTLs
Table 3. Surface Water RBTLs
Table 4. Sediment RBTLs
Attachment 3: Excel Files Used to Calculate RBTLs (on CD-ROM)
Attachment 4: Conceptual Site Model and Tables 1, 4-1 through 4-6 of RAGS

CC: Mrs. Brandi Little, ADEM (two paper copies and one electronic copy on CD-ROM)
Mr. Robin Scott, MDA (one paper copy)
Ms. Lisa Holstein, U.S. Army (one paper copy and one electronic copy on CD-ROM)
Ms. Jennifer Keys, MES (one paper copy)
Matrix Project File (two paper copies and two electronic copies on CD-ROM)

Attachment 1
Risk Algorithms

ATTACHMENT 1 – REVISED APRIL 13, 2014 (formerly Attachment C)

RISK ALGORITHMS

See Table C-1 for the variables and assigned values.

Soil/Sediment

Construction and Maintenance Workers

$$RBTL_{soil} = \frac{1}{\left(\frac{1}{RBTL_{ing}}\right) + \left(\frac{1}{RBTL_{der}}\right) + \left(\frac{1}{RBTL_{inh}}\right)} \quad (1)$$

Residents and Trespassers

$$RBTL_{soil} = \frac{1}{\left(\frac{1}{RBTL_{ing}}\right) + \left(\frac{1}{RBTL_{der}}\right)} \quad (2)$$

The equations shown below produce results in mg/kg. RBTLs for organics were multiplied by 1,000 to obtain results in µg/kg.

Pathway RBTLs

Ingestion - Carcinogenic effects

$$RBTL_{ing} = \frac{ELCR \times BW \times AT_c \times 365 \text{ days/yr}}{IR_s \times ED \times EF \times 10^{-6} \text{ kg/mg} \times SF_o} \quad (3)$$

Ingestion - Noncarcinogenic effects

$$RBTL_{ing} = \frac{THQ \times BW \times RfD_o \times AT_{nc} \times 365 \text{ days/yr}}{IR_s \times ED \times EF \times 10^{-6} \text{ kg/mg}} \quad (4)$$

Dermal - Carcinogenic effects

$$RBTL_{der} = \frac{ELCR \times BW \times AT_c \times 365 \text{ days/yr}}{SA \times M \times ABS \times 10^{-6} \text{ kg/mg} \times ED \times EF \times SF_d} \quad (5)$$

Dermal - Noncarcinogenic effects

$$RBTL_{der} = \frac{THQ \times BW \times RfD_d \times AT_{nc} \times 365 \text{ days/yr}}{A \times M \times ABS \times 10^{-6} \text{ kg/mg} \times ED \times EF} \quad (6)$$

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RISK ALGORITHMS

Inhalation - Carcinogenic effects

$$RBTL_{inh} = \frac{ELCR \times AT_c \times 365 \text{ days/yr} \times 24 \text{ hrs/day}}{VF_p \times 10^3 \text{ ug/mg} \times ET \times ED \times EF \times IUR} \quad (7)$$

Inhalation - Noncarcinogenic effects

$$RBTL_{inh} = \frac{THQ \times RfC \times AT_c \times 365 \text{ days/yr} \times 24 \text{ hrs/day}}{VF_p \times ET \times ED \times EF} \quad (8)$$

Mutagenic (MMOA) Chemicals

Ingestion

$$RBTL_{ing-MMOA} = RBTL_{ing} [\text{from Equation 3}] \times \text{Mutagenic Scaling Ratio} \quad (9)$$

Dermal

$$RBTL_{der-MMOA} = RBTL_{der} [\text{from Equation 5}] \times \text{Mutagenic Scaling Ratio} \quad (10)$$

Inhalation

$$RBTL_{inh-MMOA} = RBTL_{inh} [\text{from Equation 7}] \times \text{Mutagenic Scaling Ratio} \quad (11)$$

Ingestion Mutagenic Scaling Ratio:

Resident

$$\begin{aligned} \text{IFSM}_{\text{adj}} \left(\frac{489.5 \text{ mg-Year}}{\text{Kg-day}} \right) &= \frac{ED_{0-2} (\text{yr}) \times IRS_c \left(\frac{200 \text{ mg}}{\text{day}} \right) \times 10}{BW_c (15 \text{ Kg})} + \frac{ED_{2-6} (\text{yr}) \times IRS_c \left(\frac{200 \text{ mg}}{\text{day}} \right) \times 3}{BW_c (15 \text{ Kg})} + \\ &\quad \frac{ED_{6-16} (\text{yr}) \times IRS_a \left(\frac{100 \text{ mg}}{\text{day}} \right) \times 3}{BW_a (70 \text{ Kg})} + \frac{ED_{16-30} (\text{yr}) \times IRS_a \left(\frac{100 \text{ mg}}{\text{day}} \right) \times 1}{BW_a (70 \text{ Kg})} \\ \text{Ratio} &= \frac{\left[ED_a (30 \text{ yrs}) \times IRS_a \left(\frac{100 \text{ mg}}{\text{day}} \right) \right] / BW_a (70 \text{ kg})}{489.5 \left(\frac{\text{mg-year}}{\text{kg-day}} \right)} = 0.0876 \end{aligned} \quad (12)$$

Adolescent Trespasser

$$\text{Ratio} = \frac{BW_r (45 \text{ kg}) / [IR_{sr} (100 \text{ mg}_{\text{day}}) \times ED_r (10 \text{ yrs}) \times 3]}{BW_a (70 \text{ kg}) / [IR_{sr} (100 \text{ mg}_{\text{day}}) \times ED_a (30 \text{ yrs})]} = 0.643 \quad (13)$$

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RISK ALGORITHMS

Dermal Mutagenic Scaling Ratio

Resident

$$\begin{aligned}
 \text{DFSM}_{\text{adj}} \left(\frac{1445 \text{ mg-Year}}{\text{Kg-day}} \right) &= \frac{\text{ED}_{0-2} (\text{yr}) \times \text{AF}_c \left(\frac{0.2 \text{ mg}}{\text{cm}^2} \right) \times \text{SA}_c \left(\frac{2800 \text{ cm}^2}{\text{day}} \right) \times 10}{\text{BW}_c (15 \text{ Kg})} + \frac{\text{ED}_{2-6} (\text{yr}) \times \text{AF}_c \left(\frac{0.2 \text{ mg}}{\text{cm}^2} \right) \times \text{SA}_c \left(\frac{2800 \text{ cm}^2}{\text{day}} \right) \times 3}{\text{BW}_c (15 \text{ Kg})} + \\
 &\quad \frac{\text{ED}_{6-16} (\text{yr}) \times \text{AF}_a \left(\frac{0.07 \text{ mg}}{\text{cm}^2} \right) \times \text{SA}_a \left(\frac{5700 \text{ cm}^2}{\text{day}} \right) \times 3}{\text{BW}_a (70 \text{ Kg})} + \frac{\text{ED}_{16-30} (\text{yr}) \times \text{AF}_a \left(\frac{0.07 \text{ mg}}{\text{cm}^2} \right) \times \text{SA}_a \left(\frac{5700 \text{ cm}^2}{\text{day}} \right) \times 1}{\text{BW}_a (70 \text{ Kg})} \\
 \text{Ratio} &= \frac{\left[\text{ED}_a (30 \text{ yrs}) \times \text{SA}_a \left(5,700 \frac{\text{cm}^2}{\text{day}} \right) \times \text{AF} \left(\frac{0.2 \text{ mg}}{\text{cm}^2} \right) \right]}{1445 \left(\frac{\text{mg-year}}{\text{kg-day}} \right)} = 0.338
 \end{aligned} \tag{14}$$

Adolescent Trespasser

$$\begin{aligned}
 \text{Ratio} &= \frac{\left[\text{ED}_a (30 \text{ yrs}) \times \text{SA}_a (5,700 \text{ cm}^2) \times \text{AF}_a \left(\frac{0.2 \text{ mg}}{\text{cm}^2} \right) \times \text{EF}_a (350 \frac{\text{days}}{\text{yr}}) \right]}{\text{BW}_a (70 \text{ kg})} \\
 &= \frac{\left[\text{ED}_r (10 \text{ yrs}) \times \text{SA}_r (5,700 \text{ cm}^2) \times \text{AF}_r \left(\frac{0.2 \text{ mg}}{\text{cm}^2} \right) \times \text{EF}_r \times 350 \left(\frac{\text{days}}{\text{yr}} \right) \times 3 \right]}{\text{BW}_r (45 \text{ kg})} \\
 &= 0.643
 \end{aligned} \tag{15}$$

Soil RBTL for Vinyl Chloride (Residential RSL From Nov. 2013 RSL table)

Ingestion

$$\begin{aligned}
 \text{SL}_{\text{res-sol-ca-vc-ing}} (\text{mg/kg}) &= \frac{\text{TR}}{\left(\frac{\text{CSF}_o \left(\frac{\text{mg}}{\text{kg-day}} \right)^{-1} \times \text{EF}_r \left(\frac{350 \text{ days}}{\text{year}} \right) \times \text{IFS}_{\text{adj}} \left(\frac{114 \text{ mg-yr}}{\text{kg-d}} \right) \times 10^{-6} \text{ Kg}}{\text{AT}_r \left(\frac{365 \text{ days}}{\text{year}} \times \text{LT} (70 \text{ years}) \right)} + \right.} \\
 &\quad \left. \frac{\text{CSF}_o \left(\frac{\text{mg}}{\text{kg-day}} \right)^{-1} \times \text{IRS}_o \left(\frac{200 \text{ mg}}{\text{day}} \right) \times 10^{-6} \text{ Kg}}{\text{BW}_c (15 \text{ kg})} \right)
 \end{aligned} \tag{16}$$

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RISK ALGORITHMS

Dermal

$$SL_{res-sol-ca-vc-der} (mg/kg) = \frac{TR}{\left(\frac{CSF_o \left(\frac{mg}{kg \cdot day} \right)^{-1}}{GIABS} \times EF_r \left(\frac{350 \text{ days}}{year} \right) \times DFS_{adj} \left(\frac{361 \text{ mg} \cdot yr}{kg \cdot day} \right) \times ABS_d \times \frac{10^{-6} kg}{1 \text{ mg}} \right) + \left(\frac{CSF_o \left(\frac{mg}{kg \cdot day} \right)^{-1}}{GIABS} \times SA_c \left(\frac{2800 \text{ cm}^2}{day} \right) \times AF_c \left(\frac{0.2 \text{ mg}}{\text{cm}^2} \right) \times ABS \times \frac{10^{-6} kg}{1 \text{ mg}} \right)}{AT_r \left(\frac{365 \text{ days}}{year} \right) \times LT (70 \text{ years})} \times BV_b (15 \text{ kg}) \quad (17)$$

Groundwater (Tapwater)/Surface Water

The equations shown below produce results in µg/L. RBTls for inorganics were divided by 1,000 to obtain results in mg/L.

Resident

$$RBT_{L_{GW}} = \frac{1}{\left(\frac{1}{RBT_{L_{ing}}} \right) + \left(\frac{1}{RBT_{L_{der}}} \right) + \left(\frac{1}{RBT_{L_{inh}}} \right)} \quad (18)$$

Trespasser

$$RBT_{L_{GW \text{ or } SW}} = \frac{1}{\left(\frac{1}{RBT_{L_{ing}}} \right) + \left(\frac{1}{RBT_{L_{der}}} \right)} \quad (19)$$

Commercial Worker

$$RBT_{L_{GW}} = RBT_{L_{ing}} \quad (20)$$

Ingestion - Carcinogenic effects

$$RBT_{L_{ing}} = \frac{ELCR \times BW \times AT_c \times 365 \text{ days/yr} \times 1000 \text{ ug/mg}}{IR_w \times ED \times EF \times SF_o} \quad (21)$$

Ingestion - Noncarcinogenic effects

$$RBT_{L_{ing}} = \frac{THQ \times BW \times RfD_o \times AT_{nc} \times 365 \text{ days/yr} \times 1000 \text{ ug/mg}}{IR_w \times ED \times EF} \quad (22)$$

Dermal - Carcinogenic effects

$$DA_{event} \left(\frac{ug}{cm^2 - event} \right) = \frac{ELCR \times BW \times AT_c \times 365 \text{ days/yr} \times 1000 \text{ ug/mg}}{EV \times ED \times EF \times SA \times SF_d} \quad (23)$$

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RISK ALGORITHMS

Dermal - Noncarcinogenic effects

$$DA_{event} \left(\frac{ug}{cm^2 - event} \right) \frac{THQ \times BW \times RfD_d \times AT_{nc} \times 365 \text{ days/yr} \times 1000 \text{ ug/mg}}{EV \times ED \times EF \times SA} \quad (24)$$

(25)

Inorganics – Dermal

$$RBTL_{der} = \frac{DA_{event} \left(\frac{ug}{cm^2 - event} \right) \times 1000 \text{ cm}^3/L}{k_p \times ET} \quad (26)$$

Organics - Dermal

If $ET < t^*$ (Scenario “A” in worksheets):

$$RBTL_{der} = \frac{DA_{event} \left(\frac{ug}{cm^2 - event} \right) \times 1000 \text{ cm}^3/L}{2 \times FA \times k_p \times \sqrt{\left(\frac{6 \times \tau \times ET}{\pi} \right)}} \quad (27)$$

If $ET > t^*$ (Scenario “B” in worksheets):

$$RBTL_{der} = \frac{DA_{event} \left(\frac{ug}{cm^2 - event} \right) \times 1000 \text{ cm}^3/L}{FA \times k_p \times \left[\frac{ET}{(1+B)} + 2\tau \left(\frac{1+3B+3B^2}{(1+B)^2} \right) \right]} \quad (28)$$

Inhalation - Carcinogenic effects

$$RBTL_{inh} = \frac{ELCR \times AT_c \times 365 \text{ days/yr} \times 24 \text{ hrs/day}}{K \left(m^3/L \right) \times ET \times ED \times EF \times IUR} \quad (29)$$

Inhalation - Noncarcinogenic effects

$$RBTL_{inh} = \frac{THQ \times RfC \times AT_c \times 365 \text{ days/yr} \times 24 \text{ hrs/day}}{K \left(m^3/L \right) \times 10^3 \text{ ug/mg} \times ET \times ED \times EF} \quad (30)$$

Mutagenic (MMOA) Chemicals

Ingestion

$$RBTL_{ing-MMOA} = RBTL_{ing} [\text{from Equation 20}] \times \text{Mutagenic Scaling Ratio} \quad (31)$$

Dermal

$$RBTL_{der-MMOA} = RBTL_{der} [\text{from Equation 22}] \times \text{Mutagenic Scaling Ratio} \quad (32)$$

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RISK ALGORITHMS

Inhalation

$$RBTL_{inh-MMOA} = RBTL_{inh} [\text{from Equation 28}] \times \text{Mutagenic Scaling Ratio} \quad (33)$$

Ingestion Scaling Ratio for Water (Resident)

$$IFWM_{adj} \left(\frac{3.39 \text{ L-Year}}{\text{Kg-day}} \right) = \frac{ED_{0-2} (\text{yr}) \times IRW_c \left(\frac{1 \text{ L}}{\text{day}} \right) \times 10}{BW_c (15 \text{ Kg})} + \frac{ED_{2-6} (\text{yr}) \times IRW_c \left(\frac{1 \text{ L}}{\text{day}} \right) \times 3}{BW_c (15 \text{ Kg})} + \frac{ED_{6-16} (\text{yr}) \times IRW_a \left(\frac{2 \text{ L}}{\text{day}} \right) \times 3}{BW_a (70 \text{ Kg})} + \frac{ED_{16-30} (\text{yr}) \times IRW_a \left(\frac{2 \text{ L}}{\text{day}} \right) \times 1}{BW_a (70 \text{ Kg})}$$

$$Ratio = \frac{\left[ED_a (30 \text{ yrs}) \times IR_{wa} \left(2 \frac{\text{L}}{\text{day}} \right) \right]}{BW_a (70 \text{ kg})} = 0.338 \quad (34)$$

$$3.39 \left(\frac{\text{L-year}}{\text{kg-day}} \right)$$

Dermal Scaling Ratio for Water (Resident)

$$DFWM_{adj} \left(\frac{25394.29 \text{ events} \cdot \text{cm}^2}{\text{kg}} \right) = \left[\frac{EV_{0-2} \left(\frac{1 \text{ events}}{\text{day}} \right) \times ED_{0-2} (\text{years}) \times SA_c (6,600 \text{ cm}^2) \times 10}{BW_c (15 \text{ Kg})} + \frac{EV_{2-6} \left(\frac{1 \text{ events}}{\text{day}} \right) \times ED_{2-6} (\text{years}) \times SA_c (6,600 \text{ cm}^2) \times 3}{BW_c (15 \text{ Kg})} \right] + \left[\frac{EV_{6-16} \left(\frac{1 \text{ events}}{\text{day}} \right) \times ED_{6-16} (\text{years}) \times SA_a (16,000 \text{ cm}^2) \times 3}{BW_a (70 \text{ Kg})} + \frac{EV_{16-30} \left(\frac{1 \text{ events}}{\text{day}} \right) \times ED_{16-30} (\text{years}) \times SA_a (16,000 \text{ cm}^2) \times 1}{BW_a (70 \text{ Kg})} \right]$$

and:

$$ET_{rwadj} \left(\frac{0.664 \text{ hours}}{\text{event}} \right) = \frac{\left(ET_{0-2} \left(\frac{1 \text{ hours}}{\text{event}} \right) \times ED_{0-2} (\text{years}) + ET_{2-6} \left(\frac{1 \text{ hours}}{\text{event}} \right) \times ED_{2-6} (\text{years}) + ET_{6-16} \left(\frac{0.58 \text{ hours}}{\text{event}} \right) \times ED_{6-16} (\text{years}) + ET_{16-30} \left(\frac{0.58 \text{ hours}}{\text{event}} \right) \times ED_{16-30} (\text{years}) \right)}{ED_{0-2} (\text{years}) + ED_{2-6} (\text{years}) + ED_{6-16} (\text{years}) + ED_{16-30} (\text{years})}$$

$$Ratio = \frac{EV \left(1 \frac{\text{event}}{\text{day}} \right) \times ED_a (30 \text{ yrs}) \times SA_a (18,000 \text{ cm}^2) \times ET_a \left(0.58 \frac{\text{hr}}{\text{event}} \right)}{BW_a (70 \text{ kg})} = 0.265 \quad (35)$$

$$= \frac{\left(25,394.29 \left(\frac{\text{events} \cdot \text{yr} \cdot \text{cm}^2}{\text{day} \cdot \text{kg}} \right) \times 0.664 \frac{\text{hr}}{\text{day}} \right)}{\left(25,394.29 \left(\frac{\text{events} \cdot \text{yr} \cdot \text{cm}^2}{\text{day} \cdot \text{kg}} \right) \times 0.664 \frac{\text{hr}}{\text{day}} \right)}$$

Mutagenic Scaling Ratio for Adolescent Trespasser (surface water – ingestion and dermal) – scaled from carcinogenic RBTL for trespasser calculated with Equation 19 (note: all other MMOA RBTLs are scaled from the adult carcinogenic RBTLs)

1/3 (mutagenic multiplier for age 6-16 age group)

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RISK ALGORITHMS

No additional mutagenic adjustment is required for vinyl chloride for the trespasser, since that adjustment only pertains to the 0-6-year age group.

Mutagenic Inhalation Scaling Ratio (Resident)

$$\begin{aligned} & \text{Ratio} \\ &= \frac{ED_a (30 \text{ years})}{[ED_{0-2} (2 \text{ years}) \times 10] \times [ED_{6-16} (14 \text{ years}) \times 3] \times [ED_{16-30} (14 \text{ years}) \times 1]} \\ &= 0.395 \end{aligned} \quad (36)$$

TABLE C-1
EXPOSURE VARIABLE SUMMARY

			Adult Resident		Child Resident		Commercial Worker		Construction Worker		Adolescent Trespasser	
Target Excess Lifetime Cancer Risk (ELCR)												
			1E-05	(1)	1E-05	(1)	1E-05	(1)	1E-05		1E-05	(1)
Target Hazard Quotient (HQ)			0.1	(1)	0.1	(1)	0.1	(1)	0.1		0.1	(1)
Averaging time (carc.)	AT _c	years	70	(1)	70	(1)	70	(1)	70	(1)	70	(1)
Averaging time (noncarc.)	AT _{nc}	years	30	(1)	6	(1)	25	(1)	1	(1)	10	(1)
Body weight	BW	Kg	70	(1)	15	(1)	70	(1)	70	(1)	45	(1)
Exposure duration	ED	years	30	(1)	6	(1)	25	(1)	1	(1)	10	(1)
Slope Factor (oral)	CSF _o	kg-day/mg	chemical specific									
Slope Factor (dermal)	CSF _d	kg-day/mg	chemical specific									
Inhalation Unit Risk	IUR	m ³ /ug	chemical specific									
Reference Dose (oral)	RdD _o	mg/kg-day	chemical specific									
Reference Dose (dermal)	RdD _d	mg/kg-day	chemical specific									
Reference Concentration	RfC	mg/m ³	chemical specific									
Soil												
Ingestion rate	IR _s	mg/day	100	(1)	200	(1)	75	(1)	177	(1)	100	(1)
Adherence Factor	M	mg/cm ² -day	0.07	(1)	0.2	(1)	0.2	(1)	0.2	(1)	0.07	(2)
Skin surface area	SA	cm ²	5,700	(1)	2,800	(1)	5,700	(1)	5,700	(1)	5,700	(1)
Exposure frequency	EF	days/yr.	350	(1)	350	(1)	250	(1)	250	(1)	350	(1)
Exposure time	ET	hrs./day	-		-		10	(1)	10	(1)		
Particulate Volatilization Factor	VF _p	kg/m3	-		-		9.76E-07	(1,3)	9.76E-07	(1,3)	-	
Mutagenic Scaling Factor					0.0876	(4)					0.643	(4)
Mutagenic Dermal Scaling Factor					0.338	(4)					0.643	(4)
Groundwater												
Ingestion rate	IR _w	L/day	2	(1)	1	(1)	1	(1)	-		-	
Exposure time	ET	hr/day	0.58	(5)	1	(5)			-		-	
Event frequency	EV	events/day	1	(2,3)	1	(2)			-		-	
Skin surface area	SA	cm ²	18,000	(5)	6,600	(5)			-		-	
Exposure frequency	EF	days/yr.	350	(1)	350	(1)	250	(1)	-		-	
Volatilization factor from shower water to air	K	m ³ /L	5E-01	(9)	5E-01	(9)			-		-	
Mutagenic Ingestion Scaling Factor			0.338	(4)								
Mutagenic Dermal Scaling Factor			0.265	(4)								
Mutagenic Inhalation (Ventilation) Scaling Factor			0.395	(4)								

TABLE C-1
EXPOSURE VARIABLE SUMMARY

			Adult Resident	Child Resident	Commercial Worker	Construction Worker	Adolescent Trespasser	
Surface water and Sediment								
Contact rate (SW ingestion)	CR	L/hr.	-	-	-	-	0.05	(1)
Exposure time	ET	hrs./day	-	-	-	-	1	(10)
Event frequency	EV	/day	-	-	-	-	1	(10)
Skin surface area	SA	cm ²	-	-	-	-	5,700	(1)
Exposure frequency	EF	days/yr.	-	-	-	-	350	(1)
Ingestion rate	IR _{sed}	mg/day	-	-	-	-	100	(1)
Adherence Factor	M	mg/cm ²	-	-	-	-	0.07	(11)
Skin surface area	SA	cm ²	-	-	-	-	5,700	(11)
Mutagenic Scaling Factor							3	(4)
<i>From EPA RAGS Part E</i>	t*	=	Time to reach steady-state (hr)		Chemical-specific			
<i>(back-up worksheets):</i>	tevent	=	Lag time per event (hr/event)		Chemical-specific			
	B	=	Dimensionless ratio of the permeability coefficient of a compound through the stratum corneum relative to its permeability coefficient across the viable epidermis		Chemical-specific			

Notes:

Dashes indicate that the pathway is not relevant for that receptor.

- (1) ARBCA default (Table 3-1 of ARBCA guidance)
- (2) USEPA default for ages 7 and up (RAGS Part E page 3-19)
- (3) Per page B-10 or ARBCA guidance
- (4) Calculated; see algorithms in Attachment C
- (5) USEPA default (RAGS Part E, Exhibit 3-2)
- (6) Assumes 30 seconds to wash hands
- (7) Assumes worker washes hands 3 times per day during workday; based on 3-5 times per day (including non-occupational) as most common frequency for adults 18-65 (EPA Exposure Factors Handbook, Table 16-37)
- (8) Area of hands and forearms; recommended values for adult males and females; forearms based on 45% of arms (Exposure Factors Handbook, 2011, Table 7-2)
- (9) USEPA default (RSL calculator)
- (10) Professional judgment
- (11) Assumed same as for soil exposure

Attachment 2
Risk-Based Target Levels

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Table 3. Surface Water RBTLs
McClellan, Anniston, Alabama

Surface Water RBTLs								
Type	Matrix	Analytes	CAS#	Mutagen	Units	TSA cancer	TSA noncancer	TSA mutagenic ⁽¹⁾

Legend:

- µg/L = Micrograms per liter

mg/L = Milligrams per liter

CARB = Carbamate (EPA Method 8321)

DXN = Dioxins

EXPL = Explosives

HERB = Herbicides

INO = Miscellaneous inorganic parameters

MET = Metals

OPP = Organophosphorus pesticides
- PCB = Polychlorinated biphenyls (Aroclors)

PEST = Pesticides

RBTL = Risk-Based Target Level

RSK = Method RSK-175

TSA = Trespasser - Adolescent

SVOC = Semivolatile Organic Compound

SW = Surface Water

VOC = Volatile Organic Compound

Attachment 3
Excel Files Used to Calculate RBTLs

See Excel files on CD-ROM

The data is on a CD filed in the sleeve of the report which is located in the administrative record at Fort McClellan, Anniston, AL; and the information repositories located at the Anniston Calhoun County Public Library, Anniston, AL; and the Houston Cole Library, Jacksonville, AL.

Attachment 4
Conceptual Site Model and
Tables 1, 4-1 through 4-6 of RAGS

