

DEFENSE LOGISTICS AGENCY INSTALLATION SUPPORT FOR ENERGY 8725 JOHN J. KINGMAN ROAD FORT BELVOIR VIRGINIA 22060-6221

June 14, 2017

Mr. Paul Cho California Regional Water Quality Control Board Los Angeles Region 320 West 4th Street, Suite 200 Los Angeles, California 90013

Dear Mr. Cho:

Enclosed is the *Response to OEHHA May 1, 2017 Comments, Addendum to the Revised Human Health Risk Assessment* for the Defense Logistics Agency (DLA) Responsible Area of the Eastern Portion for No Further Action (NFA) determination for shallow soil. This report is in response to your request dated May 25, 2017. This report includes updated risk evaluations and risk summaries resulting from the previous assessment by DLA and Kinder Morgan Energy Partners (KMEP) at the 15-acre parcel for the Defense Fuel Support Point (DFSP) Norwalk facility in Norwalk, California.

If you have any questions or need additional information concerning this document, please contact Ms. Carol Devier-Heeney at (703) 767-9813 or <u>carol.devier-heeney@dla.mil</u>.

Sincerely,

FLEMING.LAURA.A Digitally signed by FLEMING.LAURA.ANN.1271112625 Date: 2017.06.14 11:49:24 -04'00'

Laura A. Fleming Chief, Environmental Division

Enclosure As stated

cc:

Michael Wilson, Air Force Civil Engineer Center Neil Irish, Principal Geologist, The Source Group, Inc. Steve Defibaugh, Kinder Morgan Energy Partners, L.P.



June 7, 2017

Mr. Paul Cho, P.G. California Regional Water Quality Control Board, Los Angeles Region 320 W. 4th Street, Suite 200 Los Angeles, CA 90013

Re: Response to OEHHA May 1, 2017 Comments Addendum to the Revised Human Health Risk Assessment for No Further Action Determination for Shallow Soil at the Eastern 15-Acre Parcel. Defense Fuel Support Point Norwalk 15306 Norwalk Boulevard Norwalk, California

Dear Mr. Cho,

On behalf of the DLA Installation Support for Energy (DLA), The Source Group, Inc., a division of Apex Companies, LLC (SGI) has prepared this letter to address questions raised by the Office of Environmental Health Hazard Assessment (OEHHA) and reported to the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) on May 1, 2017 relating to the human health risk assessment (HHRA) for shallow soil present within the eastern 15-acre parcel of the Defense Fuel Supply Point Norwalk (the Site) located at 15306 Norwalk Boulevard in Norwalk, California.

Background

The Site formerly operated as a DLA fuel storage and distribution facility, and the Site has been decommissioned. The eastern 15-acre portion of the Site is scheduled to be developed into a park by the City of Norwalk. Shallow soil in that part of the Site was excavated, treated or hauled offsite, and the Site was backfilled. Confirmation samples of soil were collected in the excavations, and a soil gas survey was also conducted to evaluate potential risks from residual contamination in deeper soil.

After completion of the requisite soil remediation activities, in August 2016, DLA compiled Site data and presented the findings of the HHRA with the objective of obtaining regulatory closure status of the shallow soils (0 to 10 feet) within the eastern 15 acres of the Site. Following receipt of the RWQCB and OEHHA request for additional investigation and modified evaluation (in a letter dated February 2, 2017), additional sampling was conducted by DLA and SFPP, L.P. (SFPP), an operating partner of Kinder Morgan, immediately thereafter between February 14 and February 24, 2017. An updated HHRA was submitted in March 2017. On May 1, 2017, OEHHA communicated to RWQCB recommendations for additional information. This submittal presents the supplemental information and additional risk evaluation to support a No Further Action determination for shallow soil in the eastern 15-acre portion of the Site. OEHHA's request for information included items related to the DLA data reported, and some information related to the SFPP, which is responsible for operations in the southern part of the eastern 15-acre portion of the Site.

In the letter dated May 1, 2017, OEHHA requested that (1) the calculated cumulative risks and hazards for the updated 2017 investigation be provided, and (2) that risks to offsite residential receptors north and south of the 15-acre parcel be evaluated.

The cumulative risks and hazards using data collected the during the 2017 soil gas sampling event were calculated and described in the March 27, 2017 Revised HHRA, but the tabulated calculations reflecting this updated data were inadvertently not included in the submittal. Attachment A to this letter provides that information.

The potentially exposed offsite residents include properties south and north of the Site. Therefore, on behalf of DLA, SGI has evaluated potential risk to residential receptors north and south of the Site.

For this evaluation, the three most northern soil vapor probes within the eastern 15-acre portion of the Site (probes SV-31, SV-32, and SV-41) were identified. These three soil vapor probes were sampled during the 2016 soil vapor investigation. The maximum detected concentration of each analyte from the combined data set of the three probes sampled (i.e., SV-31, SV-32, and SV-41) was used in the risk evaluation. SGI used a proxy value of half the detection limit. The estimated cancer risks were 2E-07 for soil vapor at 5 and 10 feet below ground surface (bgs). Cancer risks are below 1E-06, which is acceptable for residential land use. Estimated noncancer hazard indices (HIs) were 0.01 for soil vapor at 5 and 10 feet bgs. HIs are below 1, which is acceptable for residential land use. The estimated cancer risks and noncancer hazards are below acceptable regulatory thresholds and do not pose a risk to potential residential receptors. A summary of the soil vapor data and estimated cancer risks and HIs for the northern soil gas data is provided in Attachment B.

The four most southern soil vapor probes within the eastern 15-acre portion of the Site (probes SVM-27, SVM-21, SVM-22, SVM-23) were identified to evaluate the potential risk to residents located south of the Site. These four soil vapor probes were sampled during the 2017 soil vapor investigation. The maximum detected concentration of each analyte from the combined data set of the four probes sampled (i.e., SVM-27, SVM-21, SVM-22, and SVM-23) was used in the risk evaluation. For non-detected values in these probes, SGI used a proxy value of half the detection limit. The estimated cancer risks were 2E-07 and 8E-07, respectively, for soil vapor at 5 and 10 feet bgs. Cancer risks are below 1E-06, which is acceptable for residential land use. Estimated noncancer HIs were 0.03 and 0.2, respectively, for soil vapor at 5 and 10 feet bgs. HIs are below 1, which is acceptable for residential land use. The estimated cancer risks and noncancer hazards are below acceptable regulatory thresholds and do not pose a risk to potential residential receptors. A summary of the soil vapor data and estimated cancer risks and HIs for the southern soil gas data is provided in Attachment C.



The attached additional HHRA evaluations document that granting No Further Action status for the shallow soil in the eastern 15-acre portion of the Site is warranted.

Please contact the undersigned if you have any questions or comments.

Sincerely,

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Ivy Inouye Senior Toxicologist

4. Sish

Neil F. Irish, P.G. Principal Geologist

List of Attachments

Figure – Figure 1 – Soil Gas Sampling Locations Eastern 15-Acres - DFSP Norwalk Attachment A DLA Responsible Area of the Eastern Portion of DFSP Norwalk, 15306 Norwalk Blvd., Cumulative Risks and Hazards for the Updated 2017 Investigation Attachment B Risk Evaluation for Offsite Residents, North of the 15-acre Parcel Attachment C Risk Evaluation for Offsite Residents, South of the 15-acre Parcel



Documents Cited:

- California Regional Water Quality Control Board, Los Angeles Region. 2017 Requirement for Revised Human Health Risk Assessment for No Further Action Determination for Shallow Soil at the Eastern 15-Acre Parcel. February 2.
- California Regional Water Quality Control Board, Los Angeles Region (RWQCB). 2016. Letter to Ms. Carol Devier-Heeney and Mr. Steve Defibaugh. *Review of Human Health Risk Assessment for No Further Action Determination for Shallow Soil at the Eastern 15-Acre Parcel Shallow Soil*. Defense Fuel Support Point Norwalk, 15306 Norwalk Boulevard, Norwalk, California (SCP No. 0286A/B, Site ID No. 16638 and 204DM00). August 30.
- CH2M. 2016. Results of Additional Soil and Soil Vapor Sampling and Human Health Risk Assessment to Support Shallow Soil Closure for the Eastern 15-Acre Parcel, Defense Fuel Support Point, Norwalk, California. June 28.
- The Source Group, Inc. (SGI). 2016. Human Health Risk Assessment DLA-Energy Responsible Area of the Eastern Portion, Defense Fuel Support Point Norwalk, 15306 Norwalk Boulevard, Norwalk, California. May 31.
- SGI and CH2M. 2016 Response to the Office of Environmental Health Hazard Assessment (OEHHA) Comments on the: Human Health Risk Assessment, DLA-Energy Responsible Area of Eastern Portion, dated May 31, 2016, and Results of Additional Soil and Soil Vapor Sampling and Human Health Risk Assessment to Support Shallow Soil Closure for the Eastern 15-Acre Parcel, dated June 28, 2016. October 12.
- SGI and CH2M: Revised Human Health Risk Assessment, Defense Fuel Support Point Norwalk, 15306 Norwalk Boulevard. March 27.

Distribution:

- Steve Defibaugh, Kinder Morgan Energy Partners, L.P.
- Carol Devier-Heeney, Defense Logistics Agency Energy (electronic only)
- Eric Davis, CH2M
- Minxia Dong, Norwalk Public Library
- Adam Ly, Park Water Company (electronic only)
- Adriana Figueroa, City of Norwalk (electronic only)
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- Walter Scherer, March ARB (electronic only)
- Yahaira Ortiz, Office of State Senator Tony Mendoza (electronic only)



FIGURE



Park Locations Sampling_ Additional_ 2017 Maps/Fig-9 Area_ Document Path: R:\DLA-Norwalk\GIS_Maps\Park_

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	Legen	d										
	SV-13	Sampled Soil V	apor Probe Lo	ocations								
	SV-1	Soil Vapor Prob	e Locations (SGI 2015)								
	GB-23	Previous Soil S Southeast Corr	ampling Loca	tions -								
	SVM-24	Additional Soil (Sampling Locat	(SB) and Soil ions (DLA 20 ⁷	Gas (SV) 17)								
	SVM-22	2017 Sampling	Locations (KI	ИЕР)								
		SFPP Remedia Southeast Corr	tion Piping - ier									
		Surveyed Park Surveying, Inc.,	Boundary (by October 201	Coast 5)								
	Note											
	<16 @ 5ft 5 feet belo	: Concentration of the surface of th	of Benzene at e is not detec	ted.								
	49 @ 10ft: Concentration of Benzene at 10 feet below ground surface is 49 μg/m3.											
	DLA - Defense Logistics Agency.											
	KMEP - Kinder Morgan Energy Partner.											
	SFPP - Sa	anta Fe Pacific P	ipeline.									
	All concen (µg/m3).	trations are in m	nicrograms pe	r meters cubed								
				N								
		DFSP N	orwalk	, <u> </u>								
		15306 Norwa Norwalk,	alk Bouleva California	rd								
	Project Number:	Date:	Drawn By:	Approved By:								
	091-NDLA-020	3/3/2017	P. W / C. S	P. P								
	0	70 140	2	280 ∎ Feet								
	Soil Easte	Gas Samplin ern 15-Acres	ng Locatio - DFSP No	ons orwalk								
	SGI			Figuro								
	environmental		UUP, INC.	i igule								
	Signal Hill, CA (562) 597-1055	90755 5		1								

ATTACHMENT A

DLA Responsible Area of the Eastern Portion of DFSP Norwalk, 15306 Norwalk Blvd., Cumulative Risks and Hazards for the Updated 2017 Investigation

Table F-5 Risk Characterization for Soil Vapor for Residential Exposure Scenario - 2017 Investigation Defense Fuel Support Point - Norwalk Norwalk, California

		Soil Gas Screening	Level (SL) ¹		Site Data	a - Soil Gas at §	i feet bgs	Site Data - Soil Gas at 10 feet bgs			
Chemical	Soil Gas SL Based on Carcinogenic Effects (μg/m ³)	Soil Gas SL Based on Noncarcinogenic Effects (µg/m ³)	Target Cancer Risk (unitless)	Target Noncancer Hazard Index (unitless)	EPC _{soil gas} ² (μg/m ³)	Cancer Risk ³ (unitless)	Noncancer Hazard Index ⁴ (unitless)	EPC _{soil gas} ⁵ (µg/m³)	Cancer Risk ³ (unitless)	Noncancer Hazard Index ⁴ (unitless)	
			((((((
Acetone		16.000.000	1 E-06	1 E+00	98		6 E-06	120		8 E-06	
Benzene	48	1,600	1 E-06	1 E+00	15	3 E-07	9 E-03	63	1 E-06	4 E-02	
Toluene		160,000	1 E-06	1 E+00	220		1 E-03	640		4 E-03	
Ethylbenzene	560	520,000	1 E-06	1 E+00	71	1 E-07	1 E-04	150	3 E-07	3 E-04	
m,p-Xylene		52,000	1 E-06	1 E+00	270		5 E-03	520		1 E-02	
o-Xylene		52,000	1 E-06	1 E+00	90		2 E-03	200		4 E-03	
2-Butanone (MEK)		2,600,000	1 E-06	1 E+00	41		2 E-05	53		2 E-05	
(6) Carbon Disulfide		365,000	1 E-06	1 E+00	ND			20		5 E-05	
(7) 1,3-Dichlorobenzene		65,000	1 E-06	1 E+00	320		5 E-03	270		4 E-03	
Ethanol			1 E-06	1 E+00	240			190			
(8) 4-Ethyltoluene		160,000	1 E-06	1 E+00	42		3 E-04	85		5 E-04	
(6,9) Isopropanol		15,500,000	1 E-06	1 E+00	31		2 E-06	26		2 E-06	
4-Methyl-2-Pentanone		1,600,000	1 E-06	1 E+00	10		6 E-06	19		1 E-05	
Tetrachloroethene	240	18,000	1 E-06	1 E+00	7.3	3 E-08	4 E-04	10	4 E-08	6 E-04	
Trichloroethene	240	1,000	1 E-06	1 E+00	3.9	2 E-08	4 E-03	ND			
(6) 1,2,4-Trimethylbenzene		3,650	1 E-06	1 E+00	120		3 E-02	270		7 E-02	
(7) 1,3,5-Trimethylbenzene		21,000	1 E-06	1 E+00	40		2 E-03	79		4 E-03	
					Total	5 E-07	6 E-02	Total	2 E-06	1 E-01	

Notes:

EPC = exposure point concentration.

bgs = below ground surface. SL = screening level. ND = not detected.

--- = not available or not applicable.

¹ Unless otherwise noted, represents the San Francisco Regional Water Quality Control Board (SFRWQCB) Environmental Screening Level (ESL) based on noncarcinogenic or carcinogenic effects (SFRWQCB ESLs dated February 2016 revision 3).

² Value represents the maximum detected concentration in soil gas collected from 5 feet bgs.

³ Represents the excess cancer risk, based on a target excess cancer risk of one-in-one million (1 x 10^6). Excess Cancer Risk for compound *i* = Soil Gas EPC_{*i*} x Target Cancer Risk of 1 x 10^6 / Soil Gas SL_{*i*}

⁴ Represents the noncancer hazard, based on a target hazard quotient of one (1).

Hazard Quotient for compound i = Soil Gas EPC, x Target Noncancer Hazard Index of 1 / Soil Gas SL,

⁵ Value represents the maximum detected concentration in soil gas collected from 10 feet bgs.

⁶ SFRWQCB ESLs were not available; therefore, the U.S. Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) based on carcinogenic and noncarcinogenic effects were used, dated May 2016. USEPA RSLs have been developed for indoor air, but not soil gas. The residential soil gas SL is based on applying a DTSC default attenuation factor to the air SL. The resident air SL was divided by DTSC default attenuation factor of 0.002 (DTSC, 2011). The resulting value is the soil gas SL.

⁷ SFRWQCB ESLs were not available; therefore, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office Note 3 modified screening levels based on carcinogenic and noncarcinogenic effects were used, dated June 2016. DTSC-SLs have been developed for indoor air, but not soil gas. The residential soil gas SL is based on applying a DTSC default attenuation factor to the air SL. The resident air SL was divided by DTSC default attenuation factor of 0.002 (DTSC, 2011). The resulting value is the soil gas SL.

⁸ SFRWQCB ESLs were not available for 4-ethyltoluene; therefore, the ESL for toluene was used.

⁹ USEPA RSLs were not available for isopropanol; therefore, the RSL for sec-butyl alcohol was used.

Table F-6 Risk Characterization for Soil Vapor for Commercial Exposure Scenario - 2017 Investigation Defense Fuel Support Point - Norwalk Norwalk, California

		Soil Gas Screening	Level (SL) ¹		Site Dat	a - Soil Gas at §	i feet bgs	Site Data	Site Data - Soil Gas at 10		
Chemical	Soil Gas SL Based on Carcinogenic Effects (μg/m ³)	Soil Gas SL Based on Noncarcinogenic Effects (µg/m ³)	Target Cancer Risk (unitless)	Target Noncancer Hazard Index (unitless)	EPC _{soil gas} ² (µg/m ³)	Cancer Risk ³ (unitless)	Noncancer Hazard Index ⁴ (unitless)	EPC _{soil gas} ⁵ (µg/m ³)	Cancer Risk ³ (unitless)	Noncancer Hazard Index ⁴ (unitless)	
Acetone Benzene Toluene Ethylbenzene m,p-Xylene o-Xylene 2-Butanone (MEK) (6) Carbon Disulfide (7) 1,3-Dichlorobenzene Ethanol (8) 4-Ethyltoluene (6,9) Isopropanol 4-Methyl-2-Pentanone Tetrachloroethene Trichloroethene (6) 1,2,4-Trimethylbenzene (7) 1,3,5-Trimethylbenzene	420 4,900 2,100 3,000 	140,000,000 13,000 1,300,000 4,400,000 440,000 22,000,000 3,100,000 530,000 1,300,000 130,000,000 130,000 150,000 8,800 31,000 180,000	$\begin{array}{c} 1 \ E \cdot 06 \\ 1 \ E \cdot 06 $	1 E+00 1 E+00	98 15 220 71 270 90 41 ND 320 240 42 31 10 7.3 3.9 120 40	4 E-08 1 E-08 3 E-09 1 E-09 	7 E-07 1 E-03 2 E-04 2 E-05 6 E-04 2 E-04 2 E-04 2 E-04 2 E-06 6 E-04 3 E-05 2 E-07 8 E-07 8 E-07 5 E-05 4 E-03 2 E-04	120 63 640 150 520 200 53 20 270 190 85 26 19 10 ND 270 79	2 E-07 3 E-08 5 E-09 5 E-09	9 E-07 5 E-03 5 E-04 3 E-05 1 E-03 5 E-04 2 E-06 6 E-06 5 E-04 7 E-05 2 E-07 1 E-06 7 E-05 2 E-07 1 E-06 7 E-05 9 E-03 4 E-04	
					Total	5 E-08	7 E-03	Total	2 E-07	2 E-02	

Notes:

EPC = exposure point concentration.

bgs = below ground surface. SL = screening level. ND = not detected.

--- = not available or not applicable.

¹ Unless otherwise noted, represents the San Francisco Regional Water Quality Control Board (SFRWQCB) Environmental Screening Level (ESL) based on noncarcinogenic or carcinogenic effects (SFRWQCB ESLs dated February 2016 revision 3).

² Value represents the maximum detected concentration in soil gas collected from 5 feet bgs.

³ Represents the excess cancer risk, based on a target excess cancer risk of one-in-one million (1 x 10^6). Excess Cancer Risk for compound *i* = Soil Gas EPC_{*i*} x Target Cancer Risk of 1 x 10^6 / Soil Gas SL_{*i*}

⁴ Represents the noncancer hazard, based on a target hazard quotient of one (1).

Hazard Quotient for compound i = Soil Gas EPC, x Target Noncancer Hazard Index of 1 / Soil Gas SL,

⁵ Value represents the maximum detected concentration in soil gas collected from 10 feet bgs.

⁶ SFRWQCB ESLs were not available; therefore, the U.S. Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) based on carcinogenic and noncarcinogenic effects were used, dated May 2016. USEPA RSLs have been developed for indoor air, but not soil gas. The commercial soil gas SL is based on applying a DTSC default attenuation factor to the air SL. The industrial air SL was divided by DTSC default attenuation factor of 0.001 (DTSC, 2011). The resulting value is the soil gas SL.

⁷ SFRWQCB ESLs were not available; therefore, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office Note 3 modified screening levels based on carcinogenic and noncarcinogenic effects were used, dated June 2016. DTSC-SLs have been developed for indoor air, but not soil gas. The commercial soil gas SL is based on applying a DTSC default attenuation factor to the air SL. The industrial air SL was divided by DTSC default attenuation factor of 0.001 (DTSC, 2011). The resulting value is the soil gas SL.

⁸ SFRWQCB ESLs were not available for 4-ethyltoluene; therefore, the ESL for toluene was used.

⁹ USEPA RSLs were not available for isopropanol; therefore, the RSL for sec-butyl alcohol was used.

ATTACHMENT B

Risk Evaluation for Offsite Residents, North of the 15-acre Parcel

2016 Analytical Results for Volatile Organic Compounds (VOCs) in Soil Gas - North (SV-31, SV-32, and SV-41) Defense Fuel Support Point Norwalk

15306 Norwalk	Blvd,	Norwalk,	CA	90650

Sample ID	Depth	Date Sampled	Acetone	Benzene	Toluene	Ethylbenzene	m,p-Xylene	o-Xylene	2- Butanone (MEK)	4- Ethyltoluene	1,2,4- Trimethylbenzene
	(ft bgs)		(µg/m ³)	(µg/m ³)	(µg/m ³)						
SV-31-5	5	03/10/16	<48	<16	<38	<22	<44	<22	<60	<50	<50
SV-32-5	5	03/08/16	55	<16	66	<22	<44	<22	<60	<50	<50
SV-32-5 REP	5	03/08/16	63	<16	70	<22	<44	<22	<60	<50	<50
SV-41-5	5	03/10/16	100	<16	<38	<22	<44	<22	<60	<50	<50
SV-31-10	10	03/10/16	<48	<16	<38	<22	<44	<22	<60	<50	<50
SV-32-10	10	03/08/16	<48	<16	<38	<22	<44	<22	<60	<50	<50
SV-41-10	10	03/10/16	100	<16	<38	<22	<44	<22	<60	<50	<50

Notes:

Analytes detected during the 2016 site investigation in soil gas are included in this table.

Detected concentrations are shown in **bold**.

ft bgs = feet below ground surface.

 $\mu g/m^3$ = micrograms per cubic meter.

<48 = not detected at or above the indicated laboratory reporting limit.

Risk Characterization for Soil Vapor for Residential Exposure Scenario - Offsite North (SV-31, SV-32, and SV-41) **Defense Fuel Support Point - Norwalk** Norwalk, California

		Soil Gas Screening	Level (SL) ¹		Site Data	a - Soil Gas at 5	feet bgs	Site Data	- Soil Gas at 10) feet bgs
Chemical	Soil Gas SL Based on Carcinogenic Effects	Soil Gas SL Based on Noncarcinogenic Effects	Target Cancer Risk	Target Noncancer Hazard Index	EPC _{soil gas} ²	Cancer Risk ³	Noncancer Hazard Index ⁴	5 EPC _{soil gas}	Cancer Risk ³	Noncancer Hazard Index ⁴
	(µg/m³)	(µg/m ³)	(unitless)	(unitless)	(µg/m³)	(unitless)	(unitless)	(µg/m³)	(unitless)	(unitless)
Acetone Benzene Toluene Ethylbenzene m,p-Xylene o-Xylene 2-Butanone (MEK) (6) 4-Ethyltoluene (7) 1,2,4-Trimethylbenzene	 48 560 	16,000,000 1,600 520,000 52,000 52,000 2,600,000 160,000 3,650	1 E-06 1 E-06 1 E-06 1 E-06 1 E-06 1 E-06 1 E-06 1 E-06 1 E-06	1 E+00 1 E+00 1 E+00 1 E+00 1 E+00 1 E+00 1 E+00 1 E+00 1 E+00	100 8.0 70 11 22 11 30 25 25 Total	2 E-07 2 E-08 2 E-07	6 E-06 5 E-03 4 E-04 2 E-05 4 E-04 2 E-04 1 E-05 2 E-04 7 E-03 1 E-02	100 8.0 19 11 22 11 30 25 25 Total	2 E-07 2 E-08 2 E-07	6 E-06 5 E-03 1 E-04 2 E-05 4 E-04 2 E-04 1 E-05 2 E-04 7 E-03 1 E-02

Notes:

bgs = below ground surface.

 $\mu g/m^3$ = micrograms per cubic meter.

SL = screening level.

--- = not available or not applicable. EPC = exposure point concentration.

Red font indicates a proxy value of half the detection limit was used.

¹ Unless otherwise noted, represents the San Francisco Regional Water Quality Control Board (SFRWQCB) Environmental Screening Level (ESL) based on noncarcinogenic or carcinogenic effects (SFRWQCB ESLs dated February 2016 revision 3).

² Value represents the maximum detected concentration in soil gas collected from 5 feet bgs.

³ Represents the excess cancer risk, based on a target excess cancer risk of one-in-one million (1 x 10⁻⁶). Excess Cancer Risk for compound $i = \text{Soil Gas EPC}_i \times \text{Target Cancer Risk of } 1 \times 10^{-6} / \text{Soil Gas SL}_i$

⁴ Represents the noncancer hazard, based on a target hazard quotient of one (1).

Hazard Quotient for compound i = Soil Gas EPC, x Target Noncancer Hazard Index of 1 / Soil Gas SL,

⁵ Value represents the maximum detected concentration in soil gas collected from 10 feet bgs.

⁶ SFRWQCB ESLs were not available for 4-ethyltoluene; therefore, the ESL for toluene was used.

⁷ SFRWQCB ESLs were not available; therefore, the U.S. Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) based on carcinogenic and noncarcinogenic effects were used, dated May 2016. USEPA RSLs have been developed for indoor air, but not soil gas. The residential soil gas SL is based on applying a DTSC default attenuation factor to the air SL. The resident air SL was divided by DTSC default attenuation factor of 0.002 (DTSC, 2011). The resulting value is the soil gas SL.

References:

DTSC. 2011. Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air. California Environmental Protection Agency (CalEPA). October.

SFRWQCB. 2016. Environmental Screening Levels (ESLs). San Francisco Bay Region. Revision 3. February.

USEPA. 2016. Regional Screening Levels (RSLs). May.

ATTACHMENT C

Risk Evaluation for Offsite Residents, South of the 15-acre Parcel

Data Collected by DLA

2017 Analytical Results for Volatile Organic Compounds (VOCs) in Soil Gas Defense Fuel Support Point Norwalk 15306 Norwalk Blvd, Norwalk, CA 90650

Sample ID	Depth (ft bqs)	Date Sampled	Acetone	Benzene	Toluene	Ethylbenzene	Tetrachloroethene	Trichloroethene	4-Methyl-2- Pentanone (uɑ/m³)	m,p-Xylene	o-Xylene (uɑ/m³)	2-Butanone (MEK)	Carbon Disulfide (uɑ/m ³)	1,3- Dichlorobenzene (ug/m ³)	Ethanol (µg/m ³)	Isopropanol	4-Ethyltoluene	1,2,4- Trimethylbenzene	1,3,5- Trimethylbenzene (ua/m ³)
SVM27-5	5	02/16/17	40	2.2	24	6.7	<3.4	<2.7	<6.1	26	10	11	<6.2	170	220	31	3.3	12	3.3
SVM27-10	10	02/16/17	62	20	300	99	7.6	<2.7	<6.1	370	130	31	11	210	110	24	46	120	42

Notes: Analytes detected during the 2017 additional site investigation in soil gas are included in this table.

Detected concentrations are shown in **bold**.

ft bgs = feet below ground surface.

 μ g/m³ = micrograms per cubic meter.

<3.7 = not detected at or above the indicated laboratory reporting limit.

Table 4. Soil Vapor Analytical Results - February 2017

Eastern 15-acre Parcel, Defense Fuel Support Point, Norwalk, California

Data Collected by KMEP/SFPP

Analyte Type	Analyte	Unit	Current Residential Soil Gas Screening Level ^{a, b}	Current Commercial Soil Gas Screening Level ^{a, b}	SVM-20-5 2/24/2017 SVM-20 5-5.5	SVM-20-10 2/24/2017 SVM-20 10-10.5	SVM-21-5 2/24/2017 SVM-21 5-5.5	SVM-21-10 2/24/2017 SVM-21 10-10.5	SVM-22-5 2/24/2017 SVM-22 5-5.5	SVM-22-10 2/24/2017 SVM-22 10-10.5	SVM-22-10 DUP 2/24/2017 SVM-22 10-10.5	SVM-23-5 2/24/2017 SVM-23 5-5.5	SVM-23-10 2/24/2017 SVM-23 10-10.5
	1,2,4-Trimethylbenzene	μg/L	7.3	31	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	1,2-Dichloroethane	μg/L	0.11	0.47	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	1,3,5-Trimethylbenzene	μg/L			<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	2-Propanol (leak test compound)	μg/L			<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2
	Benzene	μg/L	0.097	0.42	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	Ethylbenzene	μg/L	1.1	4.9	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	Isopropylbenzene	μg/L			<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
conc. d	m,p-Xylenes	μg/L	100	440	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
COPCS	Methyl tert-butyl ether (MTBE)	μg/L	11	47	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	Naphthalene	μg/L	0.083	0.36	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	n-Butylbenzene	μg/L			<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	n-Propylbenzene	μg/L	1000	4400	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	o-Xylene	μg/L	100	440	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	sec-Butylbenzene	μg/L			<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	tert-Butanol (TBA)	μg/L			<20	<20	<20	<20	<20	<20	<20	<20	<20
	Toluene	μg/L	310	1300	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
TPH-gas	TPH-g (C4-C12)	μg/L	630 ^c	2600 ^c	<20	<20	<20	<20	<20	<20	<20	<20	<20
	2,2,4-Trimethylpentane	μg/L			<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.44	3
Other Detected Compounds	Cyclohexane	μg/L	6300	26000	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.063	0.26
-	Tetrachloroethylene (PCE)	μg/L	0.48	2.1	<0.02	<0.02	0.037	0.052	0.021	0.022	0.023	0.028	0.045

Notes:

^a Source for the Indoor Air Screening Levels: California Department of Toxic Substances Control (DTSC). 2016. Human Health Risk Assessment (HHRA)

Note Number 3: DTSC-Modified Screening Levels (DTSC-SLs). June

http://www.dtsc.ca.gov/AssessingRisk/upload/HHRA_Note_3_-2016-06.pdf

^b Attenuation factor for current land use = 0.001. Source for the attenuation factors: DTSC, 2011. Guidance for the Evaluation and Mitigation of

Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance). October. http://www.dtsc.ca.gov/AssessingRisk/upload/Final_VIG_Oct_2011.pdf

^c TPH aliphatic low screening level used for TPH-g screening levels

^d Chemicals of potential concern identified from the 2006 soil gas investigation and HHRA (Geomatrix, 2006)

--- = not available

<0.02 = not detected at the laboratory minimum reporting limit

µg/L = micrograms per liter

COPC = chemical of potential concern

DUP = field duplicate

TPH-g = total petroleum hydrocarbons quantified as gasoline

SVM-20-5 = sample ID
2/24/2017 = sample date
SVM-20 = sample location
5-5.5 = sample depth in feet below ground surface

Risk Characterization for Soil Vapor for Residential Exposure Scenario - Offsite South (SVM-27, SVM-21, SVM-22, SVM-23) Defense Fuel Support Point - Norwalk Norwalk, California

		Soil Gas Screening	Level (SL) ¹		Site Dat	a - Soil Gas at 5	feet bgs	Site Data	ı - Soil Gas at 10	0 feet bgs
Chemical	Soil Gas SL Based on Carcinogenic Effects	Soil Gas SL Based on Noncarcinogenic Effects	Target Cancer Risk	Target Noncancer Hazard Index	EPC _{soil gas} ²	Cancer Risk ³	Noncancer Hazard Index ⁴	EPC _{soil gas} ⁵	Cancer Risk ³	Noncancer Hazard Index ⁴
	(µg/m³)	(µg/m³)	(unitless)	(unitless)	(µg/m³)	(unitless)	(unitless)	(µg/m³)	(unitless)	(unitless)
Acetone Benzene Toluene Ethylbenzene m,p-Xylene o-Xylene 2-Butanone (MEK) (6) Carbon Disulfide (7) 1,3-Dichlorobenzene Ethanol (8) 4-Ethyltoluene (6,9) Isopropanol 4-Methyl-2-Pentanone Tetrachloroethene Trichloroethene (6) 1,2,4-Trimethylbenzene (7) 1,3,5-Trimethylbenzene (7, 10) 2,2,4-Trimethylpentane (6) Cyclohexane	 48 560 240 240 240 	16,000,000 1,600 160,000 52,000 52,000 2,600,000 365,000 65,000 15,500,000 1,600,000 18,000 1,000 3,650 21,000 21,000 3,150,000	$\begin{array}{c} 1 \ E \cdot 06 \\ 1 \ E \cdot 06 $	1 E+00 1 E+00	40 2.2 24 6.7 26 10 11 3.1 170 220 3.3 31 3.1 3.1 3.1 3.1 3.1 3.1 3.1 40 63	 5 E-08 2 E-07 6 E-09 2 E-07	3 E-06 1 E-03 2 E-04 1 E-05 5 E-04 2 E-04 4 E-06 3 E-03 2 E-06 2 E-06 2 E-06 2 E-06 2 E-03 1 E-03 3 E-03 3 E-03 2 E-04 2 E-04 2 E-04 2 E-04 2 E-05 2 E-04 3 E-03 3 E-05 3 E-05 5 E-05 5 E-05 5 E-05 5 E-05 5 E-05 5 E-05 5 E-05 5 E-05 5 E-	62 20 300 99 370 130 31 11 210 110 46 24 3.1 52 1.4 120 42 3,000 260	4 E-07 2 E-07 2 E-07 2 E-07 2 E-07	4 E-06 1 E-02 2 E-03 2 E-04 7 E-03 3 E-03 1 E-05 3 E-05 3 E-05 3 E-06 2 E-06 2 E-06 2 E-06 3 E-02 2 E-03 1 E-01 8 E-05 2 E-01
					iotai	2	5 2-02	iotai	0	2

Notes:

bgs = below ground surface.

 $\mu g/m^3$ = micrograms per cubic meter.

SL = screening level.

ND = not detected.

EPC = exposure point concentration. --- = not available or not applicable.

Red font indicates a proxy value of half the detection limit was used.

¹ Unless otherwise noted, represents the San Francisco Regional Water Quality Control Board (SFRWQCB) Environmental Screening Level (ESL) based on noncarcinogenic or carcinogenic effects (SFRWQCB ESLs dated February 2016 revision 3).

² Value represents the maximum detected concentration in soil gas collected from 5 feet bgs.

³ Represents the excess cancer risk, based on a target excess cancer risk of one-in-one million (1 x 10⁻⁶). Excess Cancer Risk for compound *i* = Soil Gas EPC_i x Target Cancer Risk of 1 x 10⁻⁶ / Soil Gas SL_i

⁴ Represents the noncancer hazard, based on a target hazard quotient of one (1).

Hazard Quotient for compound *i* = Soil Gas EPC_i x Target Noncancer Hazard Index of 1 / Soil Gas SL_i

⁵ Value represents the maximum detected concentration in soil gas collected from 10 feet bgs.

⁶ SFRWQCB ESLs were not available; therefore, the U.S. Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) based on carcinogenic and noncarcinogenic effects were used, dated May 2016. USEPA RSLs have been developed for indoor air, but not soil gas. The residential soil gas SL is based on applying a DTSC default attenuation factor to the air SL. The resident air SL was divided by DTSC default attenuation factor of 0.002 (DTSC, 2011). The resulting value is the soil gas SL.

⁷ SFRWQCB ESLs were not available; therefore, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office Note 3 modified screening levels based on carcinogenic and noncarcinogenic effects were used, dated June 2016. DTSC-SLs have been developed for indoor air, but not soil gas. The residential soil gas SL is based on applying a DTSC default attenuation factor to the air SL. The resident air SL was divided by DTSC default attenuation factor of 0.002 (DTSC, 2011). The resulting value is the soil gas SL.

⁸ SFRWQCB ESLs were not available for 4-ethyltoluene; therefore, the ESL for toluene was used.

⁹ SFRWQCB ESLs were not available for isopropanol; therefore, the USEPA RSL for sec-butyl alcohol was used.

¹⁰ SFRWQCB ESLs were not available for 2,2,4-trimethylpentane; therefore, the DTSC SL for 2,4,4-trimethylpentene was used.