



PACIFIC ENVIRONMENTAL GROUP, INC.

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- Analytical Results
- Field Data
- Incoming Correspondence
- Outgoing Correspondence
- Calculations & Notes
- Telecons

Date November 8, 1993  
Project 330-06.14

To: Mr. Ravi Arulanantham  
Department of Environmental Health  
Hazardous Materials Division  
Alameda County Health Care Services Division  
80 Swan Way, Room 200  
Oakland, California 94621

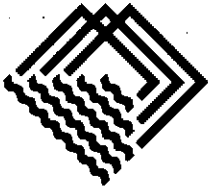
We have enclosed:

Copies	Description
<u>1</u>	<u>Calculations for Inhalation of Volatilized Groundwater for Children Exposure</u>
<u>1</u>	<u>List of References</u>

For your:   X   Use  
       Approval  
       Review  
       Information

Comments: Ravi, Per your request of November 2, 1993, I have attached the items above. Please note that the partitioning coefficient used in the inhalation risk calculation to children was 0.9, not 0.5 as indicated in the approved values section. As a result the risk was calculated correctly.

Keith Winemiller



PACIFIC ENVIRONMENTAL GROUP, INC.

ALCO HAZMAT

93 NOV -9 PM 1:53

Date November 8, 1993  
Project 330-06.14

To: Mr. Ravi Arulanantham  
Department of Environmental Health  
Hazardous Materials Division  
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80 Swan Way, Room 200  
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Comments: Ravi, Per your request of November 2, 1993, I have attached the items above. Please note that the partitioning coefficient used in the inhalation risk calculation to children was 0.9, not 0.5 as indicated in the approved values section. As a result the risk was calculated correctly.

Keith Winemiller

EQUATIONS:

$$RISK = \frac{CA \times IR \times SF \times ED \times EF}{BW \times AT}$$

$$CA = \frac{CW \times Q \times T \times PC}{V + (V \times H \times W \times T)}$$

WHERE:

- CA = BENZENE CONCENTRATION IN AIR [mg/m<sup>3</sup>]
- IR = INHALATION RATE [m<sup>3</sup>/h]
- EF = EXPOSURE FREQUENCY [d/y]
- ED = EXPOSURE DURATION [y]
- SF = SLOPE FACTOR [kg-d/mg]
- BW = BODY WEIGHT [kg]
- AT = AVERAGING TIME [d]
- CW = BENZENE CONCENTRATION IN WATER [mg/L]
- Q = FLOW RATE OF EXTRACTED GROUNDWATER [L/s]
- T = TIME (NORMALIZED TO HOURLY-BASIS) [s]
- PC = PARTITIONING COEFFICIENT [FRACTION]
- V = VOLUME OF AIR SURROUNDING THE INTAKE WELL [m<sup>3</sup>]
- V = WIND VELOCITY [m/s]
- H = DISPERSION HEIGHT [m]
- W = WIDTH OF BACKYARD [m]
- (V x H x W x T) = VOLUMETRIC WIND EFFECTS ON EXPOSED AREA [m<sup>3</sup>]

APPROVED VALUES:

- CA = CALCULATION
- IR = 0.60 m<sup>3</sup>/h
- EF = 260 d/y
- ED = 9 y
- SF = 0.029 kg-d/mg
- BW = 25 kg
- AT = 25,550 d
- CW = 0.016 mg/L
- Q = 0.63 L/s
- T = 3,600 s
- PC = ~~0.50~~ 0.90 JN 11/3/93
- V = 293 m<sup>3</sup>
- V = 2.0 m/s
- H = 1.5 m
- W = 14.0 m

NOTE: Q IS THE FLOW RATE OF EXTRACTED GROUNDWATER DETERMINED TO BE 10.0 GALLONS PER MINUTE FROM FIELD WELL STUDIES.

#1



PACIFIC ENVIRONMENTAL GROUP, INC.

Project No:

330-06.19

Figure No:

WELL #  
17349

Date:

9/13/93

Drawn By:

Jam Nott

Title: CALCULATIONS FOR INHALATION OF VOLATILIZED GROUNDWATER CHILDREN EXPOSURE

CALCULATIONS:

$$CA = \frac{(0.016 \text{ mg/L} \times 0.63 \text{ L/s} \times 3,600 \text{ s}) \times (0.7)}{(293 \text{ m}^3 + (2.0 \text{ m} \times 1.5 \text{ m} \times 14 \text{ m} \times 3600 \text{ s}))}$$

$$= \underline{\underline{2.16 \times 10^{-4} \text{ mg/m}^3}}$$

$$\text{Risk} = \frac{(2.16 \times 10^{-4} \text{ mg/m}^3 \times 0.6 \text{ m}^3/\text{h} \times 0.029 \text{ kg} \cdot \text{d}/\text{mg} \times 9 \text{ y}) \times (260 \text{ d/y})}{(25 \text{ kg} \times 25,550 \text{ d})}$$

$$= \boxed{1.37 \times 10^{-8}}$$

#2



PACIFIC ENVIRONMENTAL GROUP, INC.

Project No:

330-06.14

Figure No:

WELL #  
17349

Date:

9/13/93

Drawn By:

Jam Nant

Title: CALCULATIONS FOR INHALATION OF VOLATILIZED GROUNDWATER CHILDREN EXPOSURE

## REFERENCES

- Bonazountas, M. and Wagner, J., United States Environmental Protection Agency, *A Seasonal Soil Compartment Model*, May 1984.
- Perry, Robert and Green, Don; *Perry's Chemical Engineers' Handbook, 6th Edition*, Mc Gray-Hill Book Company, 1984, p 3-256.
- United States Environmental Protection Agency, *Health Effects Assessment Summary Tables*, Annual FY 1992; March 1992.
- United States Environmental Protection Agency, *Exposure Factors Handbook*: July 1989.
- United States Environmental Protection Agency, *Risk Assessment Guidance for Superfund, Volume 1, Human Health Evaluation Manual, Part A*: December 1989.



# FAX

Date 8/25/99

Number of pages including cover sheet \_\_\_\_\_

TO: AMIR G.  
ACHSA

FROM: SHAW G.  
IT Corporation  
1921 Ringwood Ave,  
San Jose, CA 95131

Phone \_\_\_\_\_  
Fax Phone (510) 337-9335

Phone (408) 453-7300  
Fax Phone (408) 437-9526

CC: \_\_\_\_\_

REMARKS:  Urgent  For your review  Reply ASAP  Please Comment

Hi AMIR  
Please read #4. It was nice  
talking to you!

SHAW

**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700

July 21, 1995

Michael Whelan  
ARCO Petroleum Products Co.  
2155 S Bascom Avenue, Suite 202  
Campbell CA 95008

StId 779

Subject: Work Plan and RI/FS revisions for ARCO Service Station  
0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Whelan:

This office has reviewed the Work Plan and RI/FS Supplemental Information, dated June 28, 1995, submitted by Pacific Environmental Group, Inc. (Pacific).

The work plan proposes to conduct a pilot study to determine the feasibility of reducing petroleum hydrocarbon contamination in groundwater by enhancing *in-situ* aerobic biodegradation via installation of oxygen releasing compounds (ORC) in wells located upgradient from monitoring wells MW-8 and MW-10. Additionally, the work plan proposes to discontinue pumping of the on-site groundwater extraction well EA-1 throughout the pilot study (July 1995 through December 1995) to allow for evaluation of its affect on migration of the dissolved petroleum hydrocarbon plume and to allow dissolved oxygen to disperse downgradient in groundwater in the area of MW-8. Per the work plan, dissolved oxygen concentrations will be measured monthly in wells EA-1, SP-1, SP-2, MW-8, and MW-10. A progress report of the pilot study will be included in the third quarter 1995 report, and the analyses for groundwater parameters indicative of biodegradation, which were completed for the baseline groundwater biodegradation study in May 1995, will be repeated and reported in the fourth quarter 1995 report.

The RI/FS Supplemental Information contained revisions to the November 1994 draft that included 1) a feasibility study to gather baseline concentrations of groundwater parameters to identify those parameters which may be rate limiting to natural biodegradation, 2) a risk assessment of residential indoor inhalation exposure to benzene, and 3) the inclusion of ORCs, to enhance *in-situ* bioremediation, to Alternative 2 of the Remedial Action Alternatives.

The Work Plan and RI/FS revisions are acceptable to this office with the following additions and/or comments:

Whelan

Re: 17601 Hesperian Blvd

July 20, 1995

Page 2 of 3

1. Based on the results of the baseline concentrations of dissolved oxygen collected from monitoring and domestic irrigation wells in May 1995, dissolved oxygen was limited throughout the entire study area, i.e. there were no "background" levels established for dissolved oxygen. This is contrary to what was stated in the RI/FS. By implementing Remedial Action Alternative 2, it is anticipated that increased dissolved oxygen levels by the use of ORC will increase the rate of in-situ biodegradation. However, if it is found from the pilot study that petroleum hydrocarbon concentrations do not significantly decline in areas of concern (i.e. the biodegradation rate for petroleum hydrocarbons does not increase), then other, more effective remedial alternatives, and possibly containment measures, should be considered and implemented.
2. In addition to conducting monthly measurements for dissolved oxygen concentrations during the pilot study, groundwater samples should be collected from monitoring wells EA-1, MW-8, and MW-10 and analyzed for TPH-g and BTEX on a monthly basis. Restarting or pulsing the groundwater extraction system may need to be considered if an increasing trend of petroleum hydrocarbon concentrations is detected.
3. Remedial Action Alternative 2 should not include that well owners be given the go ahead to begin pumping. Per the May 9, 1995 meeting, the Groundwater Management Plan will address the timing, appropriateness, and monitoring involved with health protection and plume migration in regard to allowing for pumping of the domestic irrigation wells. It seems appropriate that well owners should be asked not to pump at least through the pilot study while the on-site extraction system is turned off. During this time, careful monitoring should be performed to insure that petroleum hydrocarbon concentrations do not increase downgradient of the site.
4. We concur with the methodologies and exposure pathways evaluated in the risk assessment. (This evaluation did not include municipal/daily drinking water standards.) Based on current information at the site, it is the opinion of this agency that there is no significant public health risk in the areas and concentrations evaluated.
5. Please submit a draft copy of the "Fact Sheet" to this office for review and approval, prior to submitting it to the public. In addition, it was discussed in the May 9, 1995 meeting that a mass mailing of the "Fact Sheet" would be distributed to all properties in the affected area,

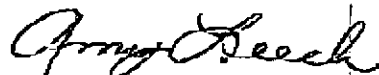


Whelan  
Re: 17601 Hasperian Blvd  
July 20, 1995  
Page 3 of 3

including properties with and without wells. Per my recollection, you were planning to use an address list that was compiled during the initial domestic well survey. Please submit a copy of this list to our office.

Please contact me at (510)567-6755 to discuss any of the above concerns. We hope the pilot study goes well and look forward to receiving preliminary information in the third quarter monitoring report.

Sincerely,



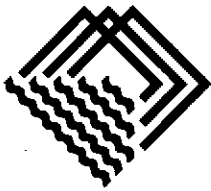
Amy Leech  
Hazardous Materials Specialist

c: Ms. Debra Moser  
Mr. Keith Winemiller  
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2025 Gateway Place, Suite 440  
San Jose, CA 95110

Ravi Arulanantham  
California Regional Water Quality Control Board  
San Francisco Bay Region  
2101 Webster St., Suite 500  
Oakland, CA 94612

Kevin Graves  
California Regional Water Quality Control Board  
San Francisco Bay Region  
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Oakland, CA 94612

Acting Chief of Environmental Protection - Files(ALL)



PACIFIC  
ENVIRONMENTAL  
GROUP, INC.

93 JUL 28 AM 9:23

*Work plan approved*  
*Ravi*  
*8/3/93*

July 27, 1993  
Project 330-06.14

Dr. Ravi Arulanantham  
Department of Environmental Health  
Hazardous Materials Division  
Alameda County Health Care Services Division  
80 Swan Way, Room 200  
Oakland, California 94621

Re: ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

Dear Dr. Arulanantham:

This letter presents the proposed methodology and variable values to complete a modified health risk assessment (RA) for the off-site groundwater associated with the site referenced above. The RA will evaluate three health risk scenarios defined by Alameda County Health Care Services Agency (ACHCSA), in a meeting with ARCO Products Company (ARCO) and Pacific Environmental Group, Inc. (PACIFIC) on February 24, 1993. The minutes of this meeting, prepared by PACIFIC in a memorandum to ARCO and ACHCSA on March 4, 1993, are included as Attachment A.

#### HEALTH RISK SCENARIOS

ARCO will determine the health risk associated with the off-site shallow groundwater for the following three scenarios defined by ACHCSA:

- o **Scenario 1 - Children Playing in Irrigating Groundwater:** This scenario assumes that children could play in extracted groundwater potentially containing dissolved petroleum hydrocarbons. As a consequence, children could be exposed to petroleum hydrocarbons via the inhalation, dermal contact, and ingestion exposure route pathways.
- o **Scenario 2 - Adults Working or Resting Adjacent to Irrigating Groundwater:** This scenario assumes that adults will work or rest adjacent to extracted groundwater potentially containing

dissolved petroleum hydrocarbons. As a consequence, adults could be exposed to petroleum hydrocarbons via the inhalation exposure route pathway. During the February 24, 1993 meeting, ACHCSA agreed that the ingestion and dermal contact exposure route pathways should not be considered for adults.

- o **Scenario 3 - Benzene Vapor Transport Through Soil:** This scenario assumes that dissolved petroleum hydrocarbons will volatilize from the groundwater, and that the vapor will migrate through the soil to the ground surface. As a consequence, children and adults could potentially be exposed to soil vapors containing petroleum hydrocarbons via the inhalation exposure route pathway.

Contaminants of concern have been identified in the off-site shallow groundwater, including benzene, toluene, ethylbenzene, and xylenes. Benzene is a known human carcinogen. Toluene, ethylbenzene, and xylenes are not classified as carcinogens, but have subchronic effects. Both carcinogenic (benzene) and non-carcinogenic (toluene, ethylbenzene, and xylenes) health risk will be determined for these three scenarios using established United States Environmental Protection Agency (EPA) and site-specific risk assessment parameter values (Tables 1 and 2). A detailed methodology to determine health risk for each scenario is described below.

### **SCENARIO 1 - Children Playing in Irrigating Groundwater**

#### **Carcinogenic Risk**

Carcinogenic health risk associated with inhalation of benzene will be determined using the variable values and the equation presented in Table 3. The concentration of benzene in air will be estimated based on the following assumptions:

1. Dissolved benzene, if present in the extracted groundwater, will partially volatilize at a constant rate during irrigation regardless of temperature, pressure, and other factors. This assumption represents a maximum exposure estimate and will provide a benzene vapor mass for each irrigation well, based on the concentration of benzene in groundwater, volume of groundwater extracted, and partitioning coefficient. The following equation will be used to estimate the maximum benzene vapor mass at each irrigation well location:

$$M = CW * Q * CF * T * PC$$

where:

- M = Mass of Benzene [grams]
- CW = Highest Historical Concentration of Benzene in Irrigation Well Groundwater [micrograms per liter]
- Q = Flow of Extracted Groundwater [liters per second]  
Flow will be estimated using on- and off-site aquifer testing data and irrigation well-specific operational data, and will be normalized to an hourly basis.
- CF = Unit Conversion Factor
- T = Time (normalized to an hourly basis) [second]
- PC = Partitioning Coefficient [fraction]

2. The partitioning coefficient is estimated to be 0.5, which suggests that 50 percent of the benzene in water will volatilize during irrigation. The partitioning coefficient is being used to more accurately estimate health risk by differentiating the benzene mass to each exposure route pathway; 50 percent of the benzene mass will be available to the inhalation route, and 50 percent will be available for the dermal contact and ingestion route pathways. The proposed value of the partitioning coefficient is not fixed, and could be adjusted. However, the partitioning coefficient is necessary to prevent an unrealistic overestimation of health risk. ?
  
3. The benzene vapor mass will instantaneously disperse during irrigation into a fixed volume of air surrounding the irrigation well. This volume will be conservatively based on the area of the homeowners backyard multiplied by a dispersion height. The area of each backyard will be based on review of aerial photographs, and will include only the landscaped area behind the residence; other buildings, like sheds, side yards, and the front-yard will not be included in this value. The area of each backyard will then be multiplied by 1.5 meters to obtain a volume. This value conservatively represents the maximum height in which the benzene mass will volatilize. Wind effects will be incorporated into the calculation using a simplified model. Wind will be estimated at 4.5 miles per hour, or 2 meters per second. These assumptions should provide a realistic maximum exposure estimate. The following equation will be used to calculate the concentration of benzene in the air volume surrounding the irrigation well: }

$$CA = (M / (V_y + (v_s * H * W * T))) * CF$$

where:

- CA = Concentration of Benzene in Air [milligrams per cubic meter]
- M = Mass of Benzene [grams]
- V<sub>y</sub> = Volume of Air Surrounding the Irrigation Well (based on area of backyard multiplied by dispersion height) [cubic meters]
- v<sub>s</sub> = Wind Velocity (Normalized to an hourly basis) [meters per second]
- H = Dispersion Height [meter]
- W = Width of Backyard [meter]
- T = Time (normalized to an hourly basis) [second]
- CF = Unit Conversion Factor

and where the expression:

$(v_s * H * W * T)$  represents the volume of air in the backyard due to wind effects [cubic meters]

The concentration of benzene in the air volume surrounding the irrigation well will be determined for each irrigation well location and used in the equation shown on Table 3.

Carcinogenic health risk associated with dermal contact and ingesting benzene-impacted groundwater will be determined using the variable values and the equations presented in Tables 4 and 5, respectively. As suggested by ACHCSA during the February 24, 1993 meeting, the contact rate associated with swimming will serve as the basis for determining the ingestion rate of groundwater.

#### **Non-Carcinogenic Health Risk**

Non-carcinogenic risk associated with inhalation, dermal contact, and ingestion exposure to extracted groundwater containing dissolved petroleum hydrocarbons will be calculated using the variable values and equations presented in Table 6.

#### **SCENARIO 2 - Adults Working or Resting Adjacent to Irrigating Groundwater**

##### **Carcinogenic Risk**

Carcinogenic health risk associated with inhalation of benzene will be determined using the variables and the equation presented in Table 7. The concentration of benzene in air will be estimated based on the equations and assumptions used in Scenario 1. However, the air volume surrounding the irrigation well for adults will be determined using the area of the backyard multiplied by a height of 2 meters.

### Non-Carcinogenic Health Risk

Non-carcinogenic risk associated with inhalation exposure to extracted groundwater containing dissolved petroleum hydrocarbons will be calculated using the variable values and equations presented in Table 6.

### SCENARIO 3 - Benzene Vapor Transport Through Soil

#### Carcinogenic Risk

Carcinogenic health risk associated with inhalation of benzene will be determined for children and adults using the variable values and the equations presented in Tables 8 and 9, respectively. The concentration of benzene in air will be estimated based on the following assumptions:

1. The highest concentration of benzene in the off-site groundwater (MW-10, March 16, 1993) will be used to determine the concentration of benzene in soil vapor. This assumption overestimates the potential health risk to homeowners across the site.
2. Volatilization of dissolved benzene will be determined using Henry's Law. The value obtained will provide a maximum benzene concentration in air at the groundwater-air interface. Henry's Law is:

$$Y_b = (H_b * X_b) / P_t$$

where:

- $Y_b$  = Mole Fraction of Benzene in Air [fraction]
- $H_b$  = Henry's Law Coefficient for Benzene [atmosphere]
- $X_b$  = Mole Fraction of Benzene in Water [fraction]
- $P_t$  = Total Partial Pressure [atmosphere]

3. Farmer's equations will be used to determine the benzene flux from the groundwater-air interface through the soil cover, and was verbally approved for application by ACHCSA. Farmer's equations are:

$$P = -D_{sv} * (C_{atm} - C_{sv}) / L$$

and

$$P_o = P * dT$$

where:

- $P$  = Pollutant Flux Across Soil Surface  
[micrograms per square centimeter per second]
- $D_{sv}$  = Apparent Steady State Diffusion Coefficient in Soil Vapor [square centimeters per second]

$C_{atm}$  = Concentration of Benzene at Ground Surface  
[micrograms per milliliter]

$C_{sv}$  = Concentration of Benzene in Soil Vapor  
[micrograms per milliliter]

$L$  = Depth of Soil Cover [centimeter]

$P_o$  = Total Pollutant Flux Across Soil Surface  
[micrograms per square centimeter]

$dT$  = Length of Simulation Time [second]

4. The soil diffusion coefficient for benzene will be related to the air diffusion coefficient for benzene using the following Farmer equation:

$$D_{sv} = D_a * ((n-m_s)^{10/3} / n^2)$$

where:

$D_{sv}$  = Apparent Steady State Diffusion Coefficient in Soil Vapor [square centimeters per second]

$D_a$  = Apparent Steady State Diffusion Coefficient in Air [square centimeters per second]

$n$  = Soil Porosity [fraction]

$m_s$  = Soil Moisture [fraction]

5. Based on soil lithology data collected during soil boring and groundwater monitoring well installation, soil porosity is estimated at 25 percent, and soil moisture is estimated at 20 percent.
6. The background concentration of benzene in air is estimated to be 1.98 micrograms per liter (ug/L). This value represents the 4-year average (1987 through 1990) background benzene concentration at the Bay Area Air Quality Management District's (BAAQMD's) sampling location in San Leandro, California. According to a BAAQMD official, the sampling data were collected in a light commercial area near residential homes, and the background concentration of benzene in air results from the operation of automobiles.
7. Depth of soil cover varies with cyclical fluctuations in the piezometric groundwater elevation surface. Based on quarterly monitoring data since 1988, the depth of soil cover varies from approximately 13.62 to 9.83 feet. The average of these values (11.72 feet) will be used in Farmer's equation.
8. The pollutant flux across the soil surface will remain constant and will instantaneously disperse into a 2-meter high volume for

July 27, 1993

Page 7

adults, and a 1.5-meter high volume for children (which represent the dispersion height). Additionally, pollutant flux will be determined on an hourly basis in order to correspond with the units of inhalation rate ( $m^3/hour$ ). These assumptions should provide a realistic maximum exposure estimate.

### **Non-Carcinogenic Health Risk**

Non-carcinogenic risk associated with inhalation exposure to soil vapor containing dissolved petroleum hydrocarbons will be calculated using the variable values and the equations presented in Table 6.

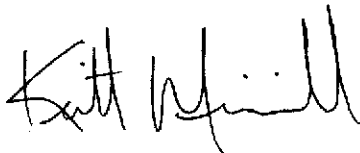
### **SUMMARY**

This letter presents the proposed methodology to perform a modified health risk assessment for the referenced site. The modified health risk assessment will evaluate the three health risk scenarios defined by ACHCSA during a February 24, 1993 meeting with ARCO and PACIFIC. Several assumptions, with justification, are presented in this letter. Based on these conservative assumptions, this methodology will be used to determine the potential health risk to the residential homeowners. Once this methodology is approved by ACHCSA, PACIFIC will prepare a letter summarizing the potential health risk associated with the off-site groundwater. This summary letter will be submitted to ACHCSA thirty days following verbal approval of this methodology.

If you have any questions regarding this methodology, please do not hesitate to call.

Sincerely,

**Pacific Environmental Group, Inc.**



**Keith Winemiller**  
Senior Staff Engineer



**Debra Moser**  
Project Manager



**REFERENCES**

United States Environmental Protection Agency, *A Seasonal Soil Compartment Model*, Bonazountas, M. and Wagner, J., May 1984.

United States Environmental Protection Agency, *Health Effects Assessment Summary Tables*, Annual FY 1992; March 1992.

United States Environmental Protection Agency, *Exposure Factors Handbook*: July 1989.

United States Environmental Protection Agency, *Risk Assessment Guidance for Superfund, Volume 1, Human Health Evaluation Manual, Part A.*: December 1989.

- Attachments:
- Table 1 - Domestic Irrigation Well Analytical Data - Total Petroleum Hydrocarbons (TPH as Gasoline and BTEX Compounds)
  - Table 2 - Domestic Irrigation Well Operational Data
  - Table 3 - Inhalation of Volatilized Groundwater: Children Exposure
  - Table 4 - Dermal Contact with Groundwater: Children Exposure
  - Table 5 - Ingestion of Groundwater: Children Exposure
  - Table 6 - Non-Carcinogenic Risk Determination: Children and Adult Exposure
  - Table 7 - Inhalation of Volatilized Groundwater: Adult Exposure
  - Table 8 - Inhalation of Soil Vapor: Children Exposure
  - Table 9 - Inhalation of Soil Vapor: Adult Exposure
  - Attachment A - Alameda County Health Care Services Agency February 24, 1993 Meeting Minutes Memorandum

- cc: Mr. Mike Whelan ARCO Products Company  
Mr. Chris Winsor, ARCO Products Company  
Dr. Charles Lapin, ARCO Products Company  
Mr. Rich Hiatt, Regional Water Quality Control Board - S.F. Bay Region  
Ms. Juliatt Shin, Alameda County Health Care Services Agency

Table 1  
**Domestic Irrigation Well Analytical Data**  
**Total Petroleum Hydrocarbons**  
**(TPH as Gasoline and BTEX Compounds)**

ARCO Service Station 0608  
 17601 Hesperian Boulevard  
 San Lorenzo, California

Well Address	Date Sampled	TPH as Gasoline (ppb)	Benzene (ppb)	Toluene (ppb)	Ethylbenzene (ppb)	Xylenes (ppb)
590	11/13/91	<30	<0.3	<0.3	<0.3	<0.3
	10/14/92	<50	<0.5	<0.5	<0.5	<0.5
	12/21/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5
633	09-11/91	NS	NS	NS	NS	NS
	10/92	NS	NS	NS	NS	NS
	12/21/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5
634	09-11/91	NS	NS	NS	NS	NS
	10/92	NS	NS	NS	NS	NS
	12/92	NS	NS	NS	NS	NS
	03/16/93	NS	NS	NS	NS	NS
642	11/13/91	<30	<0.3	<0.3	<0.3	<0.3
	10/16/92	<50	<0.5	<0.5	<0.5	<0.5
	12/21/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5
675	09-11/91	NS	NS	NS	NS	NS
	10/92	NS	NS	NS	NS	NS
	12/92	NS	NS	NS	NS	NS
	03/16/93	NS	NS	NS	NS	NS
17197	11/13/91	<30	<0.3	<0.3	<0.3	<0.3
	10/14/92	<50	<0.5	<0.5	<0.5	<0.5
	12/21/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5
17200	11/13/91	440	2.7	<0.3	<0.3	12
	10/92	NS	NS	NS	NS	NS
	12/18/92	160	1.4	<0.5	<0.5	3.4
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5
17203	11/13/91	<30	<0.3	<0.3	<0.3	<0.3
	10/92	NS	NS	NS	NS	NS
	12/21/92	<50	<0.5	<0.5	<0.5	1.3
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5

Table 1 (continued)  
**Domestic Irrigation Well Analytical Data**  
 Total Petroleum Hydrocarbons  
 (TPH as Gasoline and BTEX Compounds)

ARCO Service Station 0608  
 17601 Hesperian Boulevard  
 San Lorenzo, California

Well Address	Date Sampled	TPH as Gasoline (ppb)	Benzene (ppb)	Toluene (ppb)	Ethylbenzene (ppb)	Xylenes (ppb)
17302	10/21/91	72	0.64	<0.3	0.44	<0.3
	10/92	NS	NS	NS	NS	NS
	12/21/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5
17348	09-11/91	NS	NS	NS	NS	NS
	10/92	NS	NS	NS	NS	NS
	12/21/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5
17349	09/27/91	780	13.0	<3.0	<3.0	<3.0
	10/14/92	2,200	<5.0	<5.0	<5.0	110
	12/18/92	1,500	14.0	1.8	7.1	56
	03/16/93	1,100	16.0	4.2	1.8	1.8
17371	11/13/91	870	9.0	1.0	2.1	4.5
	10/14/92	<50	<0.5	<0.5	<0.5	<0.5
	12/18/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	500	8.7	<0.5	3.9	3.1
17372	09/27/91	300	5.5	<0.60	1.3	0.72
	10/14/92	220	<1.0	<1.0	<1.0	<1.0
	12/18/92	290	3.8	0.88	0.99	1.2
	03/16/93	110*	<0.5	<0.5	<0.5	<0.5
17393	11/13/91	31	<0.3	<0.3	<0.3	<0.3
	10/92	NS	NS	NS	NS	NS
	12/18/92	<50	<0.5	<0.5	<0.5	<0.5
	03/16/93	<50	<0.5	<0.5	<0.5	<0.5

ppb = Parts per billion  
 < = Not detected at or above laboratory detection limit  
 NS = Not sampled  
 \* = Non-typical chromatograph pattern.

Table 2  
**Domestic Irrigation Well Operational Data**

ARCO Service Station 608  
 17601 Hesperian Boulevard  
 San Lorenzo, California

Well Identification	Frequency of Operation (days/year)	Duration of Operation (hours/day)	Estimated Area of Backyard (m <sup>2</sup> )
590	52	6 to 7	NA
633	NA	NA	NA
634	NA	NA	NA
642	260	1 to 1.5	NA
675	NA	NA	NA
17197	52	NA	NA
17200	NA	NA	2,369
17203	24	1.5	NA
17302	156	5	102
17348	NA	NA	NA
17349	260	1	195
17371	24	2	111
17372	260	2	446
17393	NA	NA	NA

m<sup>2</sup> = Square meters  
 NA = Not available or not applicable

**Table 3  
Inhalation of Volatilized Groundwater: Children Exposure**

ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

**Equation:**

$$\text{Risk} = \frac{\text{CA} \times \text{IR} \times \text{ET} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

**Where:**

- CA = Benzene Concentration in Air [mg/cubic meter]
- IR = Inhalation Rate [cubic meters/hour]
- ET = Exposure Time [hours/day]
- EF = Exposure Frequency [days/year]
- ED = Exposure Duration [years]
- SF = Slope Factor [mg/kg-day]
- BW = Body Weight [kg]
- AT = Averaging Time [days]

**Proposed Variable Values:**

- CA = Irrigation Well-Specific Concentration  
Determined for each location using method described in text
- IR = 0.6 cubic meters/hour (Showering, all age group; EPA, 1989)  
Assumes children will play in irrigation spray
- ET = Irrigation Well-Specific Value (Homeowner Liaison)
- EF = Irrigation Well-Specific Value (Homeowner Liaison)
- ED = 9 years (by convention; EPA, 1989)
- SF = 0.029 mg/kg-day (EPA IRIS Database)
- BW = 25 kg (6 < 9 year old boys and girls; EPA, 1989)
- AT = 25,550 days (EPA, 1989)  
Assumes 70 year lifetime for carcinogenic effects

**Table 4  
Dermal Contact with Groundwater: Children Exposure**

ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

**Equation:**

$$\text{Risk} = \frac{\text{CW} \times \text{SA} \times \text{PC} \times \text{ET} \times \text{EF} \times \text{ED} \times \text{CF} \times \text{SF}}{\text{BW} \times \text{AT}}$$

**Where:**

- CW = Benzene Concentration in Air [mg/L]
- SA = Skin Surface Area Available for Contact [square centimeters]
- PC = Dermal Permeability Constant [cm/hour]
- ET = Exposure Time [hours/day]
- EF = Exposure Frequency [days/year]
- ED = Exposure Duration [years]
- CF = Volumetric Conversion Factor for Water [1 liter/1,000 cubic centimeters]
- SF = Slope Factor [mg/kg-day]
- BW = Body Weight [kg]
- AT = Averaging Time [days]

**Proposed Variable Values:**

- CW = Irrigation Well-Specific Concentration  
Maximum groundwater benzene concentration detected in each irrigation well will be used
- SA = 4,970 square centimeters (Hands, arms, legs, 9<10 year olds; EPA, 1989)
- PC = 0.41 centimeters/hour
- ET = Irrigation Well-Specific Value (Homeowner Liaison)
- EF = Irrigation Well-Specific Value (Homeowner Liaison)
- ED = 9 years (by convention; EPA, 1989)
- CF = 0.001 liters/cubic centimeter
- SF = 0.029 mg/kg-day (EPA IRIS Database)
- BW = 25 kg (6<9 year old boys and girls; EPA, 1989)
- AT = 25,550 days (EPA, 1989)  
Assumes 70 year lifetime for carcinogenic effects

Table 5  
Ingestion of Groundwater: Children Exposure

ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

Equation:

$$\text{Risk} = \frac{\text{CW} \times \text{IR} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

Where:

- CW = Benzene Concentration in Water [mg/liter]
- IR = Ingestion Rate [liters/day]
- EF = Exposure Frequency [days/year]
- ED = Exposure Duration [years]
- SF = Slope Factor [mg/kg-day]
- BW = Body Weight [kg]
- AT = Averaging Time [days]

Proposed Variable Values:

- CW = Irrigation Well-Specific Concentration  
Maximum groundwater benzene concentration detected in each irrigation well will be used
- IR = 0.35 liters/day (EPA, 1989 and Homeowner Liaison)  
Based on 7 hour contact time and 50 mL/hour contact rate
- ET = Irrigation Well-Specific Value (Homeowner Liaison)
- EF = Irrigation Well-Specific Value (Homeowner Liaison)
- ED = 9 years (by convention; EPA 1989)
- SF = 0.029 mg/kg-day (EPA IRIS Database)
- BW = 25 kg (6<9 year old boys and girls; EPA, 1989)
- AT = 25,550 days (EPA, 1989)  
Assumes 70 year lifetime for carcinogenic effects

**Table 6  
Non-Carcinogenic Risk Determination: Children and Adult Exposure**

ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

Equations:	Ingestion	Inhalation	Dermal Contact
Risk =	$\frac{CW * IR}{BW * RfD}$	$\frac{CA}{RfC}$	$\frac{CW * SA * PC * ET}{BW * RfD}$
<b>Where:</b>	<p>CW = Toluene, Ethylbenzene, Xylene Concentration in Water [mg/L]            CA = Toluene, Ethylbenzene, Xylene Concentration in Air [mg/cubic meter]            IR = Ingestion Rate [liters/day]            SA = Skin Surface Area [square centimeters]            PC = Dermal Permeability Constant [cm/hour]            ET = Exposure Time [hours/day]            BW = Body Weight [kg]            RfD = Reference Dose [mg/kg-day]            RfC = Reference Concentration [mg/cubic meter]</p>		
<b>Proposed Variable Values:</b>	<p>CW = Irrigation Well-Specific Concentration            Maximum groundwater concentration of each component detected in each well will be used</p> <p>CA = Irrigation Well-Specific Concentration            Determined for each location using method described in text</p> <p>IR = (Water) 0.35 L/day (ACHCSA)            = (Air) 20 cubic meters/day (Adult, average; EPA, 1989)            = (Air) 20 cubic meters/day (Children, assumed)</p> <p>ET = Irrigation Well-Specific Value (Homeowner Liaison)</p> <p>SA = 4,970 square centimeters (Hands, arms, legs, 9&lt;10 year olds; EPA, 1989)</p> <p>PC = 0.41 centimeters/hour</p> <p>BW = 70 kg (Adult, average; EPA, 1989)            = 25 kg (6&gt;9 year old boys and girls; EPA, 1989)</p> <p>RfD = (Ethylbenzene) 0.1 mg/kg/day (EPA IRIS Database)            = (Toluene) 0.2 mg/kg/day (EPA IRIS Database)            = (Xylene) 2 mg/kg/day (EPA IRIS Database)</p> <p>RfC = (Ethylbenzene) 1 mg/cubic meter (EPA IRIS Database)            = (Toluene) 0.2 mg/cubic meter (EPA IRIS Database)            = (Xylene) 0.3 mg/cubic meter (EPA IRIS Database)</p>		



Table 7  
Inhalation of Volatilized Groundwater: Adult Exposure

ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

Equation:

$$\text{Risk} = \frac{\text{CA} \times \text{IR} \times \text{ET} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

Where:

- CA = Benzene Concentration in Air [mg/cubic meter]
- IR = Inhalation Rate [cubic meters/hour]
- ET = Exposure Time [hours/day]
- EF = Exposure Frequency [days/year]
- ED = Exposure Duration [years]
- SF = Slope Factor [mg/kg-day]
- BW = Body Weight [kg]
- AT = Averaging Time [days]

Proposed Variable Values:

- CA = Irrigation Well-Specific Concentration  
Determined for each location using method described in text
- IR = 20 cubic meters/day (Adult, average; EPA, 1989)
- ET = Irrigation Well-Specific Value (Homeowner Liaison)
- EF = Irrigation Well-Specific Value (Homeowner Liaison)
- ED = 70 years (Lifetime, by convention; EPA, 1989)
- SF = 0.029 mg/kg-day (EPA IRIS Database)
- BW = 70 kg (Adult, average; EPA, 1989)
- AT = 25,550 days (EPA, 1989)  
Assumes 70 year lifetime for carcinogenic effects

Table 8  
Inhalation of Soil Vapor: Children Exposure

ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

**Equation:**

$$\text{Risk} = \frac{\text{CA} \times \text{IR} \times \text{ET} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

**Where:**

CA = Benzene Concentration in Air [mg/cubic meter]  
IR = Inhalation Rate [cubic meters/hour]  
ET = Exposure Time [hours/day]  
EF = Exposure Frequency [days/year]  
ED = Exposure Duration [years]  
SF = Slope Factor [mg/kg-day]  
BW = Body Weight [kg]  
AT = Averaging Time [days]

**Proposed Variable Values:**

CA = To be determined using methodology described in text  
IR = 0.6 cubic meters/hour (Showering, all age groups; EPA, 1989)  
Assumes children will play within the irrigation spray  
ET = 15.36 hours/day (EPA, 1989)  
EF = 365 days/year  
Assumes continuous daily exposure  
ED = 9 years (by convention; EPA, 1989)  
SF = 0.029 mg/kg-day (EPA IRIS Database)  
BW = 25 kg (6 < 9 year old boys and girls; EPA, 1989)  
AT = 25,550 days (EPA, 1989)  
Assumes 70 year lifetime for carcinogenic effects

Table 9  
Inhalation of Soil Vapor: Adult Exposure

ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

Equation:

$$\text{Risk} = \frac{\text{CA} \times \text{IR} \times \text{ET} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

Where:

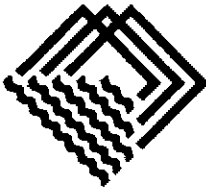
CA = Benzene Concentration in Air [mg/cubic meter]  
IR = Inhalation Rate [cubic meters/hour]  
ET = Exposure Time [hours/day]  
EF = Exposure Frequency [days/year]  
ED = Exposure Duration [years]  
SF = Slope Factor [mg/kg-day]  
BW = Body Weight [kg]  
AT = Averaging Time [days]

Proposed Variable Values:

CA = To be determined using proposed methodology described in text  
IR = 0.83 cubic meters/hour (Adult, average; EPA, 1989)  
Based on EPA Guidance  
ET = 15.36 hours/day (EPA, 1989)  
EF = 365 days/year  
Assumes continuous daily exposure  
ED = 70 years (Lifetime, by convention; EPA, 1989)  
SF = 0.029 mg/kg-day (EPA IRIS Database)  
BW = 70 kg (Adult, average; EPA, 1989)  
AT = 25,550 days (EPA, 1989)  
Assumes 70 year lifetime for carcinogenic effects

**ATTACHMENT A**

**ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
FEBRUARY 24, 1993 MEETING MINUTES  
MEMORANDUM**



PACIFIC  
ENVIRONMENTAL  
GROUP, INC.

March 4, 1993  
Project 330-06.14

MEMORANDUM

<b>SENT</b>	
<input checked="" type="checkbox"/> MAILED	<input type="checkbox"/> BY HANI
<input type="checkbox"/> FED EX	<input type="checkbox"/> COURIER
<input type="checkbox"/> FAXED	<input type="checkbox"/> FINAL
<input type="checkbox"/> UPS	<input type="checkbox"/> DRAFT
Date 3-4-93 Init. [Signature]	

To: Mr. Michael Whelan  
ARCO Products Company  
P.O. Box 5811  
San Mateo, California 94402

cc: Dr. Charles Lapin, ARCO  
Dr. Ravi Arulanantham, ACHCSA  
Mr. Chris Winsor, ARCO

From: Mr. Keith Winemiller  
Pacific Environmental Group, Inc.  
2025 Gateway Place, Suite 440  
San Jose, California 95110

Subject: ARCO Service Station 0608  
17601 Hesperian Boulevard  
San Lorenzo, California

This memorandum presents the minutes of the meeting between Alameda County Health Care Services Agency (ACHCSA), ARCO Products Company (ARCO), and Pacific Environmental Group, Inc. (PACIFIC) conducted on February 24, 1993 regarding the above referenced site. Meeting attendees included: ACHCSA - Dr. Ravi Arulanantham, ARCO - Dr. Charles Lapin (via telephone), and PACIFIC - Mr. Keith Winemiller. The purpose of this meeting was to discuss the risk assessment parameter values proposed in PACIFIC's letter to ACHCSA, dated December 8, 1992. The main discussion topics and subsequent action items are summarized below:

- o Dr. Arulanantham indicated that he supports the utilization of site-specific risk assessment parameters to more closely determine site-specific health risk. However, Dr. Arulanantham indicated that, due

to the nature of the impact, specifically the proximity to, and impact of residential irrigation wells, more conservative risk assessment parameters are appropriate.

- o Dr. Arulanantham outlined three scenarios which the risk assessment must evaluate. These scenarios are:
  1. **Children playing in irrigating groundwater.** Health risk to children playing in benzene-affected, irrigating groundwater will be determined for the inhalation, ingestion, and dermal contact exposure pathways.
  2. **Adults adjacent to irrigating groundwater.** Health risk to adults as a result of working, or resting adjacent to, irrigating groundwater will be determined for the inhalation exposure pathway.
  3. **Benzene vapor transport through soil.** Health risk to adults and children due to inhalation of benzene, which has migrated through the soil from the groundwater surface into the homes of well owners.
- o Dr. Arulanantham indicated that these scenarios can be effectively modeled, and that additional air sampling will be unnecessary. PACIFIC will prepare a summary of the models which will be used to determine inhalation exposure and soil vapor transport parameters, and will outline the procedure for conducting the risk assessment. This outline should be submitted to ACHCSA for approval.
- o Dr. Arulanantham indicated that the benzene concentration in groundwater used for the first and second scenarios may be well-specific. ARCO may also use the highest benzene concentration detected in any irrigation well to determine health risk for these two scenarios. Additionally, the maximum benzene concentration in groundwater detected off site should be used for the third scenario.
- o Dr. Arulanantham agreed that the adults should not ingest groundwater; therefore, ARCO will not calculate health risk associated with groundwater ingestion for adults. Furthermore, he indicated that children will ingest groundwater during play-activities. He suggested that the ingestion rate associated with swimming may be appropriate for this activity.

- o Dr. Arulanantham indicated that exposure duration should be based on lifetime exposure.
- o Dr. Arulanantham indicated that the well operation data used for exposure time and exposure frequency should not be averaged. He indicated that the maximum values observed for exposure frequency and exposure time may be used in place of worst case scenario values (24 hours per day and 365 days per year, respectively).
- o Dr. Arulanantham agreed that if well use is discontinued all exposure routes, except for benzene vapor transport through soil, will be eliminated.
- o ARCO indicated that no data exists to determine past health risk; however, data is available to determine current health risk.

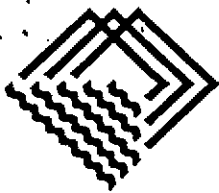
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*Renn*

**ATTACHMENT C**

**GROUNDWATER ANALYTICAL RESULTS AND RISK ASSESSMENT  
CALCULATIONS, FEBRUARY 4, 1992**





PACIFIC  
ENVIRONMENTAL  
GROUP, INC.

February 4, 1991  
Project 330-06.13

Mr. Chuck Carmel  
ARCO Products Company  
P.O. Box 5811  
San Mateo, California

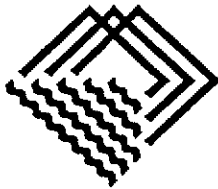
Re: Groundwater Analytical Results and  
Risk Assessment Calculations  
ARCO Service Station 608  
17601 Hesperian Boulevard at Hacienda Avenue

Dear Mr. Carmel:

This letter presents the results of the sampling of the domestic irrigation water-supply wells located downgradient of the above referenced site. Pacific Environmental Group, Inc. (PACIFIC), on behalf of ARCO Products Company (ARCO) performed the groundwater sampling to determine whether groundwater has been impacted by petroleum hydrocarbons. PACIFIC and ARCO assume that the water-supply wells are only used for irrigation purposes, and not as a drinking water source. The sampling events were performed on September 27, October 21, and December 13, 1991. All groundwater samples were submitted to a state-certified laboratory to be analyzed for total petroleum hydrocarbons calculated as gasoline (TPH-g), and benzene, toluene, ethylbenzene, and xylenes (BTEX compounds) in groundwater.

Laboratory analysis of the groundwater samples collected from the domestic irrigation wells has detected TPH-g and benzene at concentrations ranging between non-detected and 870 parts per billion (ppb), and non-detected and 13 ppb, respectively.

Since the chemical benzene is listed in Proposition 65, PACIFIC performed a risk assessment to determine if a threat to human health exists as a result of the benzene noted in groundwater.



PACIFIC  
ENVIRONMENTAL  
GROUP, INC.

February 4, 1991  
Project 330-06.13

Mr. Chuck Carmel  
ARCO Products Company  
P.O. Box 5811  
San Mateo, California

Re: Groundwater Analytical Results and  
Risk Assessment Calculations  
ARCO Service Station 608  
17601 Hesperian Boulevard at Hacienda Avenue

Dear Mr. Carmel:

**This letter presents the results of the sampling of the domestic irrigation water-supply wells located downgradient of the above referenced site. Pacific Environmental Group, Inc. (PACIFIC), on behalf of ARCO Products Company (ARCO) performed the groundwater sampling to determine whether groundwater has been impacted by petroleum hydrocarbons. PACIFIC and ARCO assume that the water-supply wells are only used for irrigation purposes, and not as a drinking water source. The sampling events were performed on September 27, October 21, and December 13, 1991. All groundwater samples were submitted to a state-certified laboratory to be analyzed for total petroleum hydrocarbons calculated as gasoline (TPH-g), and benzene, toluene, ethylbenzene, and xylenes (BTEX compounds) in groundwater.**

Laboratory analysis of the groundwater samples collected from the domestic irrigation wells has detected TPH-g and benzene at concentrations ranging between non-detected and 870 parts per billion (ppb), and non-detected and 13 ppb, respectively.

Since the chemical benzene is listed in Proposition 65, PACIFIC performed a risk assessment to determine if a threat to human health exists as a result of the benzene noted in groundwater.

### INITIAL RISK ASSESSMENT

The initial risk assessment was calculated using potency values from the EPA Health Effects Assessment Summary Tables, January 1991. These tables correspond to the EPA's Integrated Risk Information System (IRIS) Database which is updated on a monthly basis. The IRIS potency value (slope factor) for benzene is  $2.9 \times 10^{-2} \text{ (mg/kg-day)}^{-1}$ .

The results of the calculations using the IRIS potency values for ingestion and dermal absorption of groundwater are  $1.08 \times 10^{-5}$  and  $2.01 \times 10^{-6}$ , respectively. Attachment A presents the assumptions used in the calculation of the initial risks for each specific pathway.

### PRESENT RISK ASSESSMENT

The present risk assessment was calculated using values for benzene obtained from California Department of Health Services Title 22, which are based on the following risk assessment documents:

- o *Report to the Scientific Review Panel on Benzene.* Prepared by the California Air Resources Board and California Department of Health Services, November 27, 1984.
- o *Interim Quantitative Cancer Unit Risk Estimate Due to Inhalation of Benzene.* EPA 600/X-85-022. Interim Report. United States Environmental Protection Agency, February 15, 1985.

Potency values (slope factors) estimated by the California Department of Health Services (CDHS) were calculated from epidemiological studies on humans and animal cancer bioassays (mice and rats). The epidemiological studies analyzed leukemia incidence data for humans occupationally exposed to benzene via inhalation. The use of mice and rats provide an increase in the potency value (slope factor) since these animals are more sensitive to the effects of benzene than humans. The CDHS established a potency value (slope factor) of  $0.1 \text{ (mg/kg-day)}^{-1}$  for estimating risks from the exposure of benzene.

Several assumptions were made in calculating the risks. The assumptions include: (1) the ingestion of groundwater at a rate of 1/2 and 1 liter per day (liter/day) and (2) the exposure duration of an individual living in the area and coming into contact with benzene is 35 years.

The calculations using the CDHS potency value (slope factor) for ingestion of groundwater at a rate of 1/2 and 1 liter/day, and dermal absorption of

February 4, 1992

Page 3

groundwater are  $9.29 \times 10^{-6}$ ,  $4.64 \times 10^{-6}$ , and  $3.47 \times 10^{-6}$ , respectively. Attachment B presents the assumptions used in the calculation of present risks for each specific pathway.

If you have any questions regarding the contents of this letter, please call.

Sincerely,

**Pacific Environmental Group, Inc.**



**Kelly C. Brown**  
Senior Staff Geologist



**Debra J. Moser**  
Senior Geologist

**Attachments:** Attachment A- Initial Carcinogenic Risk Calculations Based on Using IRIS Potency Value  
Attachment B- Present Carcinogenic Risk Calculations Based on Using CDHS Potency Value

cc: Mr. Charles Lapin, ARCO Products Company  
Mr. John Meck, ARCO Products Company  
Mr. Chris Winsor, ARCO Products Company

**ATTACHMENT A**

**INITIAL CARCINOGENIC RISK CALCULATIONS  
BASED ON USING IRIS POTENCY VALUE**

**ATTACHMENT A**  
**INITIAL CARCINOGENIC RISK CALCULATIONS**  
**BASED ON USING IRIS POTENCY VALUE**

---

The risk level was calculated using Environmental Protection Agency (EPA) guidelines (EPA, *Risk Assessment Guidance for Superfund. Volume 1.*, December 1989), and The California Safe Drinking Water and Toxic Enforcement Act of 1986, which establishes specific regulatory levels posing no significant risk. The EPA standard values are developed to include safety factors to protect the sensitive individual. These values are conservative for the majority of the population.

The risk assessment due to existing conditions covers the groundwater environmental media. Possible exposure pathways are evaluated for the groundwater media. These pathways include: (1) ingestion of groundwater and (2) dermal absorption of groundwater. In other words, this assessment considers the risk by (1) a person drinking 2 liters (approximately 1/2 gallon) of the groundwater everyday for 70 years and (2) a person wetting their skin with the groundwater for 1/2 hour everyday for 70 years.

Because benzene is the only carcinogen of the compounds identified at the site, the carcinogenic risk is determined by evaluating the presence of benzene.

Data used in the risk assessment was obtained from the groundwater sampling events performed during the months of September, October, and December 1991. Due to the low concentrations of benzene detected in groundwater, the highest concentration (13 micrograms per liter [ug/L]) noted in all of the neighborhood water-supply wells will be used to determine any risks to human health.

Assumptions used in the calculation of a risk for a specific pathway are discussed in the individual sections below.

### **Carcinogenic Risks**

The carcinogenic risk is the estimated excess probability of an individual developing cancer over a lifetime as a result of exposure to the potential carcinogen. The numerical value generated for the carcinogenic risk is a unitless number. The values are based

on a formula using known parameters and assumptions. The use of these parameters and assumptions in the calculation will result in the carcinogenic risk estimate to be generally a high estimate. The EPA is reasonably confident that the "true risk" will not exceed the risk estimate.

#### Ingestion of Groundwater:

$$\text{Risk} = \frac{\text{CW} \times \text{IR} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

CW = The concentration of the compound in the water (milligrams per liter [mg/L]). This is the highest benzene concentration calculated from the September, October, and December 1991 results for all wells sampled (0.013 mg/L).

IR = The ingestion rate of water (liters per day [L/day]). The EPA value of 2 L/day (approximately 0.5 gallon) was used. ✓

EF = Pathway specific exposure frequency (days per year [day/yr]). A residential exposure of 365 days/yr was used. ✓

ED = Exposure duration (years [yr]). A duration of 70 years was used. This assumption is based on the average lifetime of an individual. ✓

SF = Slope factor (milligrams per kilogram per day [mg/kg/day]<sup>-1</sup>). This is the compound-specific slope for increased cancer risk. The value for benzene is  $2.9 \times 10^{-2}$  (mg/kg/day)<sup>-1</sup> (IRIS Database, EPA 1989). ✓

BW = Body weight (kilograms [kg]). The EPA standard value of 70 kg for the average body weight of an adult was used. *Child 15kg*

AT = Averaging time (day). This is calculated by the number of days in a year multiplied by the average lifetime of an individual, which is 70 years (365 day/yr x 70 yr) = 25,550 day.

$$\text{EF} \times \text{ED} \times \text{SF} = \text{constant} = 740.95 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1})$$

$$\text{Risk} = \frac{(0.013 \text{ mg/L})(2 \text{ L/day})(740.95 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1}))}{(70 \text{ kg})(25,550 \text{ day})}$$

$$\text{Risk} = 1.08 \times 10^{-5}$$

**Dermal Absorption of Groundwater:**

$$\text{Risk} = \frac{\text{CW} \times \text{CF} \times \text{SA} \times \text{PC} \times \text{ET} \times \text{EF} \times \text{ED} \times \text{CF} \times \text{SF}}{\text{BW} \times \text{AT}}$$

CW = The concentration of compound in water (mg/L). The highest benzene concentration for the wells was 0.013 mg/L.

CF = Conversion factor (1 L/1,000 cm<sup>3</sup>).

\* for child  
use full value  
0.925 m<sup>2</sup>

SA = Skin surface area available for contact (centimeter squared [cm<sup>2</sup>]). The surface area for an adult male is 1.94 meter squared (m<sup>2</sup>) and the surface area for an adult female is 1.69 m<sup>2</sup>. The average of these two, 1.82 m<sup>2</sup> or 18,200 cm<sup>2</sup> for total skin area. To consider the incidental contact caused by landscape watering and other outdoor activities, one tenth of the total, or 1,820 cm<sup>2</sup> was used. ✓

PC = Chemical specific dermal permeability constant (centimeter per hour [cm/hr]). Benzene is poorly absorbed through the skin (NIOSH 1974); therefore, a factor of 0.41 cm/hr was used. This is an estimate and is being further researched. ✓

should 1hr/day →

ET = Exposure time (hours per day [hr/day]). A value of 0.5 hr/day was used. This represents the time for watering landscape, washing cars, and other outdoor chores.

EF = Exposure frequency (365 day/yr).

ED = Exposure duration (70 yr).

SF = Slope factor for benzene (2.9 x 10<sup>-2</sup> (mg/kg/day)<sup>-1</sup>).

BW = Body weight (70 kg).

AT = Averaging time (25,550 day).

$$\text{EF} \times \text{ED} \times \text{SF} = 740.95 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1})$$

$$\text{Risk} = \frac{(0.013 \text{ mg/L})(1 \text{ L}/1,000 \text{ cm}^3)(1,820 \text{ cm}^2)(0.41 \text{ cm/hr})(0.5 \text{ hr/day})(740.95 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1}))}{(70 \text{ kg})(25,550 \text{ day})}$$

$$\text{Risk} = 2.01 \times 10^{-6}$$

This calculated risk for the exposure to groundwater was based on the drinking of 2 liters of water, or skin contact for 70 years, 365 days a year. It is very unlikely that this amount of exposure will occur. Also, the risk is based on the current concentration of benzene existing at the same concentration for 70 years. Under these conditions,



benzene concentrations usually decline with time. Therefore, the actual risk will be less than the calculated risk. Therefore, there is no increased risk to health based on the use of the IRIS potency value for benzene.

drinking  $1.08 \times 10^{-5}$

dermal  $2 \times 10^{-6}$

$1.2 \times 10^{-5}$

inhalation ?

Inhalation of Airborne Chemical

$$CDI = \frac{CA \times IR \times ET \times EF \times ED}{BW \times AT}$$

CA = mg/m<sup>3</sup> they should calculate this

IR = m<sup>3</sup>/hour

ET = 1/2 hour/day - adult  
1 hour/day - child

**ATTACHMENT B**

**PRESENT CARCINOGENIC RISK CALCULATIONS  
BASED ON USING CDHS POTENCY VALUE**

**ATTACHMENT B**  
**PRESENT CARCINOGENIC RISK CALCULATIONS**  
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The risk level was calculated using Environmental Protection Agency (EPA) guidelines (EPA, *Risk Assessment Guidance for Superfund. Volume 1.*, December 1989), and The California Safe Drinking Water and Toxic Enforcement Act of 1986, which establishes specific regulatory levels posing no significant risk. The EPA standard values are developed to include safety factors to protect the sensitive individual. These values are conservative for the majority of the population.

The risk assessment due to existing conditions covers the groundwater environmental media. Possible exposure pathways are evaluated for the groundwater media. These pathways include: (1) ingestion of groundwater and (2) dermal absorption of groundwater. In other words, this assessment considers the risk by (1) a person drinking 1/2 to 1 liter (approximately 1/4 to 1/2 gallon) of the groundwater everyday for 35 years and (2) a person wetting their skin with the groundwater for 1/2 hour everyday for 35 years.

Because benzene is the only carcinogen of the compounds identified at the site, the carcinogenic risk is determined by evaluating the presence of benzene.

Data used in the risk assessment was obtained from the groundwater sampling event performed during the month of September, October, and December 1991. Due to the low concentrations of benzene detected in groundwater, the highest benzene concentration (13 ug/L) noted in all of the neighborhood water-supply wells will be used to determine any risks to human health.

Assumptions used in the calculation of a risk for a specific pathway are discussed in the individual sections below.

### **Carcinogenic Risks**

The carcinogenic risk is the estimated excess probability of an individual developing cancer over a lifetime as a result of exposure to the potential carcinogen. The numerical value generated for the carcinogenic risk is a unitless number. The values are based on a formula using known parameters and assumptions. The use of these parameters

and assumptions in the calculation will result in the carcinogenic risk estimate to be generally a high estimate. The California Health and Welfare Agency has established these levels determining "no significant risk."

**Ingestion of Groundwater (Ingestion Rate = 1 L/day):**

$$\text{Risk} = \frac{\text{CW} \times \text{IR} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

CW = The concentration of the compound in the water (milligrams per liter [mg/L]). This is the highest benzene concentration calculated from the September, October, and December 1991 results for all wells sampled (0.013 mg/L).

IR = The ingestion rate of water (liters per day [L/day]). The value of 1 L/day (approximately 0.25 gallon) was used.

EF = Pathway specific exposure frequency (days per year [day/yr]). A residential exposure of 365 days/yr was used.

ED = Exposure duration (years [yr]). A duration of 35 years was used. This assumption is based on the average time an individual would remain living in the area.

SF = Slope factor (milligrams per kilogram per day [mg/kg/day]<sup>-1</sup>). This is the compound-specific slope for increased cancer risk. The value for benzene is 0.1 (mg/kg/day)<sup>-1</sup> (CDHS, 1990).

BW = Body weight (kilograms [kg]). The EPA standard value of 70 kg for the average body weight of an adult was used.

AT = Averaging time (day). This is calculated by the number of days in a year multiplied by the average lifetime of an individual, which is 70 years (365 day/yr x 70 yr) = 25,550 day.

$$\text{EF} \times \text{ED} \times \text{SF} = \text{constant} = 1,277.50 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1})$$

$$\text{Risk} = \frac{(0.013 \text{ mg/L})(1 \text{ L/day})(1,277.50 \text{ day}[\text{mg}/\text{kg}/\text{day}]^{-1})}{(70 \text{ kg})(25,550 \text{ day})}$$

$$\text{Risk} = 9.29 \times 10^{-6}$$

**Ingestion of Groundwater (Ingestion Rate = 1/2 L/day):**

$$\text{Risk} = \frac{\text{CW} \times \text{IR} \times \text{EF} \times \text{ED} \times \text{SF}}{\text{BW} \times \text{AT}}$$

CW = The concentration of the compound in the water (mg/L). This is the highest benzene concentration calculated from the September, October, and December 1991 results for all wells sampled (0.013 mg/L).

IR = The ingestion rate of water (liters per day [L/day]). The value of 1/2 L/day (approximately 0.25 gallon) was used.

EF = Pathway specific exposure frequency (days per year [day/yr]). A residential exposure of 365 days/yr was used.

ED = Exposure duration (years [yr]). A duration of 35 years was used. This assumption is based on the average time an individual would remain living in the area.

SF = Slope factor (milligrams per kilogram per day [mg/kg/day]<sup>-1</sup>). This is the compound-specific slope for increased cancer risk. The value for benzene is 0.1 (mg/kg/day)<sup>-1</sup> (CDHS, 1990).

BW = Body weight (kilograms [kg]). The EPA standard value of 70 kg for the average body weight of an adult was used.

AT = Averaging time (day). This is calculated by the number of days in a year multiplied by the average lifetime of an individual, which is 70 years (365 day/yr x 70 yr) = 25,550 day.

$$\text{EF} \times \text{ED} \times \text{SF} = \text{constant} = 1,277.50 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1})$$

$$\text{Risk} = \frac{(0.013 \text{ mg/L})(0.5 \text{ L/day})(1,277.50 \text{ day}[\text{mg}/\text{kg}/\text{day}]^{-1})}{(70 \text{ kg})(25,550 \text{ day})}$$

$$\text{Risk} = 4.64 \times 10^{-6}$$

**Dermal Absorption of Groundwater:**

$$\text{Risk} = \frac{\text{CW} \times \text{CF} \times \text{SA} \times \text{PC} \times \text{ET} \times \text{EF} \times \text{ED} \times \text{CF} \times \text{SF}}{\text{BW} \times \text{AT}}$$

CW = The concentration of compound in water (mg/L). The highest benzene concentration for the wells sampled in September, October, and December 1991 was used (0.013 mg/L).

CF = Conversion factor (1 L/1,000 cm<sup>3</sup>).

SA = Skin surface area available for contact (centimeter squared [cm<sup>2</sup>]). The surface area for an adult male is 1.94 meter squared (m<sup>2</sup>) and the surface area for an adult female is 1.69 m<sup>2</sup>. The average of these two, 1.82 m<sup>2</sup> or 18,200 cm<sup>2</sup> for total skin area. To consider the incidental contact caused by landscape watering and other outdoor activities, one tenth of the total, or 1,820 cm<sup>2</sup> was used.

PC = Chemical specific dermal permeability constant (centimeter per hour [cm/hr]). Benzene is poorly absorbed through the skin (NIOSH 1974); therefore, a factor of 0.41 cm/hr was used. This is an estimate and is being further researched.

ET = Exposure time (hours per day [hr/day]). A value of 0.5 hr/day was used. This represents the time for watering landscape, washing cars, and other outdoor activities.

EF = Exposure frequency (365 day/yr).

ED = Exposure duration (35 yrs).

SF = Slope factor for benzene (0.1 (mg/kg/day)<sup>-1</sup>).

BW = Body weight (70 kg).

AT = Averaging time (25,550 day).

$$EF \times ED \times SF = 1,277.50 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1})$$

$$\text{Risk} = \frac{(0.013 \text{ mg/L})(1 \text{ L}/1,000 \text{ cm}^3)(1,820 \text{ cm}^2)(0.41 \text{ cm/hr})(0.5 \text{ hr/day})(1,277.50 \text{ day}([\text{mg}/\text{kg}/\text{day}]^{-1}))}{(70 \text{ kg})(25,550 \text{ day})}$$

$$\text{Risk} = 3.47 \times 10^{-6}$$

This calculated risk for the exposure to groundwater was based on the drinking of 1/2 to 1 liter of groundwater, or skin contact for 35 years, 365 days a year. It is very unlikely that this amount of exposure will occur. Also, the risk is based on the current concentration of benzene existing at the same concentration for 35 years. Under these conditions, benzene concentrations usually will decline with time. The actual risk will be less than the calculated risk. Therefore, there is no increased risk to health based on the use of CDHS potency value for benzene.

Totals  $1.2 \times 10^{-6}$