From: Barton, Dana
To: James Dotchin
Cc: Wetmore, Cynthia; Stralka, Daniel
Subject: RE: pCBSA
Date: Tuesday, January 06, 2015 1:39:21 PM

Thank you, JD, for your quick reply. I do have a follow-up question for you re:

For drinking water, the BCL is 3,650 ug/L. (or 3.65 ppm)

Because the memo in the material you referenced below indicates 37 ppm not 3.65 ppm (however, there is also a unit switch see in red below which is causing some confusion).

> The toxicity database for pCBSA is also sparse. The Companies used the Michigan Department of
> Environmental Quality (MDEQ, 2006) recommended oral RfD of 1 mg/kg-day for pCBSA. We
> agree that this is a reasonable recommendation. MDEQ (2006) reviewed the available toxicity data
> and, although limited, a NOAEL of 1,000 mg/kg was identified in a 28-day feeding study in male
> rats. Because of the limited oral bioavailability of pCBSA and expected urinary excretion, it was
> assumed that pCBSA sub-chronic toxicity would not be much different. MDEQ applied a 1,000 fold
> uncertainty factor to derive the 1 mg/kg-day oral RfD. **The corresponding groundwater screening**
> **level is 37 mg/L.** This groundwater value is higher than that recommended in a Record of Decision
> (ROD) for Montrose Chemical and Del Amo Superfund Sites located in Los Angeles, California
> (USEPA, 1999). According to the ROD, a provisional drinking water standard of 25 mg/L was used
> for pCBSA. This is based on one sub-chronic non-cancer study in which the State of California
> established a non-promulgated and provisional No Observed Adverse Effect Level (NOEL) of 1
> mg/kg/day for pCBSA. This is the same value The Companies recommended based on the MDEQ
> (2006) report. The ROD did not specify the exposure assumptions used in the derivation of the 25
> mg/L provisional drinking water standard. **When default exposure assumptions (i.e., 30 year**

exposure duration, 2 liters/day drinking water ingestion rate, and 70 kg body weight) are used with
the RfD of 1 mg/kg-day, the corresponding groundwater concentration is 37 ug/L
Therefore, we
find the recommended groundwater screening level derived by the Companies to be adequate since
we were able to verify the calculation.

Do you have time to talk through the information with myself and staff members? We are in discussions with the State of California about the reinjection standard for pCBSA of 25 ppm that was selected in our Record of Decision for the Montrose site.

Thank you!
Dana

Dana Barton
Section Chief, Superfund Division
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From: James Dotchin [mailto:jdotchin@ndep.nv.gov]
Sent: Tuesday, January 06, 2015 12:30 PM
To: Barton, Dana
Cc: Greg Lovato
Subject: RE: pCBSA

Dana,
For an easier review below are the numbers for CBSA.

p-chlorobenzene sulfonic acid's BCL is 117 mg/kg and is based on the saturation limit so both the residential and industrial values are the same. For drinking water, the BCL is 3,650 ug/L.

JD
James (JD) Dotchin
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From: James Dotchin
Sent: Tuesday, January 06, 2015 12:28 PM
To: Barton, Dana (Barton.Dana@epa.gov)
Cc: Greg Lovato
Subject: RE: pCBSA

Dana,
It is good timing that you asked because I was digging in the files yesterday for the tox profiles for organic acids at the OSSM (Montrose is the M) site in Henderson and I found the attached.
This is also located on our website along with other tox profiles here
http://ndep.nv.gov/bmi/technical.htm (about 3/4 of the way down)

The NDEP has Basic Comparison Levels (BCL's) for this and a number of other analytes we have at the BMI site in Henderson NV.
http://ndep.nv.gov/bmi/technical.htm (scroll down to the Risk Assessment and Toxicology section about half of the way down the page)

Please take a look and feel free to call me to discuss if you have any questions. I have attached all of the relevant documents in this e-mail.
Thanks,
JD

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From: Greg Lovato
Sent: Tuesday, January 06, 2015 10:49 AM
To: Barton, Dana (Barton.Dana@epa.gov)
Cc: James Dotchin
Subject: pCBSA

Hi Dana,

I got your message and referred it to JD Dotchin in our Las Vegas office who is currently managing the Montrose project in Henderson.

JD should be getting in touch with you.

Thanks,
Greg

Greg Lovato
Deputy Administrator
NV Division of Environmental Protection
775-687-9373