REDACTED VERSION

Property 17 - [redacted]
Name
Address

RE: Wilcox Oil Company Superfund Site – Residential Data Results

Dear ____:

This letter provides you with a summary of the soil data results for your property. Based on our review of the data, soil samples collected from your property did not exceed levels considered acceptable by EPA for short-term exposures. Although some concentrations exceeded their Residential Screening Level (RSL) for soil, this is merely an indication that further evaluation may be warranted. The concentrations that exceeded the RSL are expected to fall within the accepted range established by EPA for long term exposures.

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Table 1 below presents the results for those chemicals detected in the soil and exceeding the RSL. All other concentrations fell below the RSL. Arsenic was detected in every sample with the highest result being 4.4 milligrams per kilogram (mg/kg) at a depth of 6 – 12 inches below ground surface (bgs). In addition, several Polycyclic Aromatic Hydrocarbons were detected as presented below.

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Grid	Depth	Chemical	Concentration mg/kg	Screening Level mg/kg
Grid 1	0 – 2 inches bgs	Benzo(a)anthracene	0.2	0.16
		Benzo(a)pyrene	0.17	0.016
		Benzo(b)fluoranthene	0.22	0.16
		Dibenzo(a,h)anthracene	0.028	0.016
	2 – 6 inches bgs	Benzo(a)anthracene	0.25	0.16
		Benzo(a)pyrene	0.17	0.016
		Benzo(b)fluoranthene	0.24	0.16
		Dibenzo(a,h)anthracene	0.029	0.016
Grid 4	0 – 2 inches bgs	Benzo(a)pyrene	0.02	0.016
Grid 5	0 – 2 inches bgs	Benzo(a)pyrene	0.019	0.016
	2 – 6 inches bgs	Benzo(a)pyrene	0.037	0.016

No SL for comparison but had detections.
Chromium??
Pesticides??
SVOA/VOA??
I'm working on the above red questions (including some language for minerals), but What is the question on SVOA/VOA?

The Residential Soil Screening Levels represent conservative levels developed using risk assessment guidance from the EPA Superfund program. RSLs are considered by the Agency to be protective for humans (including sensitive groups) over a lifetime of exposure. RSLs are not cleanup standards and are used for site "screening" to help identify areas, contaminants, and

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conditions that may require further investigation at a particular site. Generally, at sites where contaminant concentrations fall below RSLs, no further action or study is warranted under the Superfund program, so long as the exposure assumptions at a site match those taken into account by the RSL calculations. Chemical concentrations above the RSL do not automatically trigger a response action; however, exceeding the RSL suggests that further evaluation of the potential risks by site contaminants is appropriate. As we move forward with our site investigation, we will be evaluating these contaminants in more detail through a Site-specific Human Health Risk Assessment to determine the potential risks these contaminants may pose. For additional information related to Arsenic and Polycyclic Aromatic Hydrocarbons, please see the enclosed contaminant profiles developed by the Agency for Toxic Substances and Disease Registry (ATSDR).

[Something missing?? maybe a restatement that there is no need for immediate action and concentrations are with the acceptable range? Should there be a 'protect yourself in the interim by limiting digging in these grids?] I don't think we need to reiterate 'screening' because we have 4 times. As far as language to 'protect yourself'… I agree we should do it, but caveat with "IF you are concerned…"

The following summary is provided to help you better understand how we sampled your property. Figure 1 shows that your property was divided into XX grids. Within each Grid, 5 samples from 4 depth intervals were collected. One sample represents the 0 – 2 inches bgs, the second represents 2 – 6 inches bgs, the third represents 6 – 12 inches bgs, and the fourth represents 12 – 24 inches bgs. Figure 2 shows an example of the sample process. If there is no sample result in the Table for a depth interval, then we were not able to collect that sample due to little soil recovery or the core could not be pushed deeper because of rock

We would like to follow-up with you during the week of October 19, 2015, to discuss the data presented in this letter and answer any questions that you may have. We will contract you by phone to schedule a time that fits your schedule. In the interim, should you want to talk with us, please contact me at 214-665-8143, or 1-800-533-3508, or Todd Downham, Oklahoma Department of Environmental Quality at 405-702-5136.

Sincerely,

Katrina Higgins-Coltrain,
Remedial Project Manager
LA/OK/NM Section

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Commented [HM1]: Agreed

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Commented [HM2]: Probably can exclude this Can be discussed with prop owner during follow up visit

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NOTES FROM HH SL WEB PAGE – NOT TO BE INCLUDED IN THE LETTER

1. **What are SLs?**

The screening levels (SLs) presented on this site are developed using risk assessment guidance from the EPA Superfund program and can be used for Superfund sites. They are risk-based concentrations derived from standardized equations combining exposure information assumptions with EPA toxicity data. SLs are considered by the Agency to be protective for humans (including sensitive groups) over a lifetime; however, SLs are not always applicable to a particular site and do not address non-human health endpoints, such as ecological impacts. The SLs contained in the SL table are generic; they are calculated without site-specific information. They may be re-calculated using site-specific data.

2. **Why are SLs used?**

They are used for site "screening" and as initial cleanup goals, if applicable. SLs are not de facto cleanup standards and should not be applied as such. The SL's role in site "screening" is to help identify areas, contaminants, and conditions that require further federal attention at a particular site. Generally, at sites where contaminant concentrations fall below SLs, no further action or study is warranted under the Superfund program, so long as the exposure assumptions at a site match those taken into account by the SL calculations. Chemical concentrations above the SL would not automatically designate a site as "dirty" or trigger a response action; however, exceeding a SL suggests that further evaluation of the potential risks by site contaminants is appropriate. SLs are also useful tools for identifying initial cleanup goals at a site. In this role, SLs provide long-term targets to use during the analysis of different remedial alternatives. By developing SLs early in the decision-making process, design staff may be able to streamline the consideration of remedial alternatives.

3. **How do SLs differ from cleanup standards?**

SLs are generic screening values, not de facto cleanup standards. Once the Baseline Risk Assessment (BLRA) is completed, site-specific risk-based remediation goals can be derived using the BLRA results. The selection of final cleanup goals may also include (Applicable or Relevant and Appropriate Requirements (ARARs) and to be considered guidance (TBCs), as well as site-specific risk-based goals.

In the Superfund program, this evaluation is carried out as part of the nine criteria for remedy selection outlined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Once the nine-criteria analysis is completed, the SL may be retained as is or modified (based on site-specific information) prior to becoming established as a cleanup standard. This site-specific cleanup level is then documented in the Record of Decision.

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