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Sent: Monday, April 10, 2023 3:06 PM
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Subject: Gasco OU - Human Health TPH PRG Tables and TPH RBC Workbooks for Review

Hello Wes,

Please find attached the tables (in PDF) and the TPH Excel Workbooks that DEQ requested during the March 24, 2023, technical meeting.

Attached for review are the following tables and excel workbooks:

1. Table 14a presents a comparison of chemical data/parameters that were used in the 2021 and 2018 TPH RBC Workbooks and the current EPA Regional Screening Levels (RSLs; November 2022).
2. Table 14b presents a comparison of toxicity data/parameters that were used in the 2021 and 2018 TPH RBC Workbooks and the current EPA Regional Screening Levels (RSLs; November 2022) and EPA Provision Peer-Reviewed Toxicity Values (PPRTV; 2022).
3. A "zip" file that contains the following TPH RBC Workbooks in two subfolders:
 - a. Copies of the five-site specific 2021 TPH RBC Workbooks run in "Show All Values" mode (2021 RBC AllVals Folder)
 - b. Copies of the five-site specific 2021 TPH Subchronic RBC Workbooks run in "Show All Values" mode (2021 RBC SC AllVals Folder)

As shown on Tables 14a and 14b, the chemical and toxicity parameters are consistent between the 2021 and 2018 TPH RBC workbooks but there are some differences observed between the TPH RBC Workbooks and the EPA values in the current RSL and PPRTV references. The previously submitted Human Health PRG Tables 11 and 13 presented the differences in parameters observed between the TPH RBC Workbooks and the 2018 RBDM Workbooks for Individual Chemicals.

It appears that the previously noted differences between the 2018 and 2021 TPH RBCs were likely due to the 2018 TPH RBC Workbooks being run in the "Gasoline Fraction" mode. Anchor QEA was able to

recreate the 2021 TPH RBCs when the 2018 TPH RBC Workbooks were run in the "Non-Gasoline Fraction" mode and resolve the minor differences previously observed in the 2018 Excavation Worker soil TPH RBC and Groundwater in Excavation TPH RBCs.

As requested by DEQ, Anchor QEA ran the chronic and subchronic 2021 TPH RBC Workbooks in "Show All Values" mode (see attached TPH RBC Workbooks). For the chronic TPH Workbook, we noted that some numerical TPH RBCs changed in addition to those that were noted as ">MAX". For example, the RA-1 Construction Worker TPH RBC changed from 1,600 mg/kg to 1,500 mg/kg when run in "Show All Values" mode. Is the change to numerical TPH RBCs, in addition to those that were ">MAX", expected? If not, Anchor QEA would like to discuss the use of the TPH RBCs that result from running the workbooks in "Show All Values" mode further with DEQ.

Anchor QEA believes that we are close to being able to finalize the parameters to use in calculating Human Health TPH RBCs and have consistent workbooks and TPH RBCs for use in the Gasco OU FS. Please let us know if you have any comments or questions related to these tables or workbooks. We can establish an appropriate path forward to finalize these Human Health TPH RBCs once DEQ has had a chance to review and comment on these materials.

Thanks.

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