

RESPONSE TO COMMENTS AND QUESTIONS RECEIVED FROM
MR. KEVIN D. BROWN
REGARDING TOM'S SIERRA BULK PLANT CLAIM # 10407
Dated January 19, 2014

Comment: A Human Health Risk Assessment (HHRA) is not available in Geotracker to review.

Response: A formal HHRA has not been undertaken by the Responsible Party to evaluate petroleum vapor intrusion (PVI) risks at the Site. Fund staff performed a professional assessment of site-specific PVI risks from residual constituents as presented in the Review Summary Report. The assessment did not indicate any unacceptable health risk.

Comment: It is appropriate to use Appendix 4, Scenario 4 of the Policy to evaluate potential PVI threats to indoor air because soil vapor data has been collected.

Response: The collected soil vapor data date back to 2007 and 2010, well before December 2012 when the Site underwent remediation through the excavation and disposal of approximately 640 tons of petroleum impacted soils. The 2007 and 2010 soil vapor data are therefore not representative of current site conditions. Moreover, the Site is to be redeveloped into a petroleum fueling facility in the foreseeable future. Within the context of the Policy, the Site therefore meets the exclusion for active station under a future land use perspective. Under the exclusion, satisfaction of the media-specific criteria for PVI to indoor air is not required at commercial petroleum fueling facilities.

Question: Is this a site with "unique attributes" as defined by the Policy?

Answer: There are no documented unique attributes that are applicable to the Site in the case files that would make closure inappropriate under the Policy.

Question: Can the 2012 report on the removal of the ASTs and USTs be uploaded to GeoTracker for review?

Answer: The report has yet to be uploaded to GeoTracker by the regulatory agency. However, a copy of it can be obtained by contacting the Nevada County Department of Environmental Health, 950 Maidu Avenue, Nevada City, CA 95959, Attn: David Huff.

Question: Can the HHRA be uploaded to GeoTracker for review?

Answer: Please refer to first comment above.

Question: What is meant by "abandonment of monitoring wells"?

Answer: It generally refers to the destruction of monitoring wells in accordance with applicable standards, statutes, laws and regulations in California.