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REPLY TO
ATTENTION OF

November 03, 2008

Directorate of Public Works

Mr. James Bearzi
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Main Post Phase III RFI; Corrective Action Complete (CAC) Criteria for SWMUs: 8-9 (WSMR 36); 10-11 (WSMR 74); 12-13 (WSMR 60); 14-15 (WSMR 33); 16 (WSMR 79); 17 (WSMR 73); 21 (WSMR 31); 22 (WSMR 32); 80 (WSMR 30); 140 (WSMR 84); and 156 (WSMR 57).

Dear Mr. Bearzi:

Enclosed you will find the table titled: *Main Post Phase III RFI Summary and Conclusions*.

WSMR understands, that the NMED position is that corrective action units with a residential risk greater than 10^{-5} , but less than 10^{-4} , are not eligible for CAC with unrestricted land use. Accordingly, WSMR has re-evaluated the subject units against an industrial land use designation. Those units that are eligible are being proposed for CAC under industrial land use criteria. Our understanding is that this designation is acceptable to NMED.

The enclosed table summarizes the above referenced units and addresses CAC criteria for each. The CAC criteria were developed based on the NMED Notice of Deficiency (NOD), date December 8, 2006, Phase III Facility Investigation Report Main Post Multiple Site (SWMUs 8-17,21,22,80,140 and 156). The table addresses each NOD comment.

These unites are eligible for CAC as either: Residential – Unrestricted Use for sites not exceeding background and NMED residential Soil Screening Levels (SSLs); or Industrial – for units with controls for those sites having contaminant concentrations exceeding the NMED residential SSLs, but not exceeding industrial SSLs.

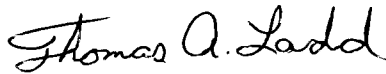
The following certification is provided as required by our permit and according to NMAC 20.4.1.900, incorporating 40 CFR 270.11:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Copies furnished, with enclosure (1 print copy), to Ms. Cheryl Frischkorn, NMED-HWB; Mr. Chuck Hendrickson, Region VI EPA; Mr. Bill Davis, U.S. Army Environmental Center; and, without enclosure, to Mr. John Kieling, NMED-HWB and White Sands Technical Services, LLC.

Should you have any questions regarding this matter, please contact Mr. Joel Giblin of our Environmental Compliance Branch at (575) 678-1007.

Sincerely,



THOMAS A. LADD
Director, Public Works

Enclosure

Response to NMED NOD -- NOTICE OF DEFICIENCY PHASE III RCRA FACILITY INVESTIGATION REPORT MAIN POST MULTIPLE SITES (SWMUs 8-17, 21, 22, 80, 140, AND 156) WHITE SANDS MISSILE RANGE, EPA ID NO. NM2750211235 HWB-WSMR-06-003, 8 December 2006			
Number	NMED Comments	WSMR Response	Discussion
<p>NMED Introductory Statement: The New Mexico Environment Department (NMED) reviewed the Department of the Army's (Permittee) Phase III RCRA Facility Investigation (RFI) Report Main Post Multiple Sites SWMUs 8-17, 21, 22, 80, 140, and 156, dated May 2006. The Permittee must address the following comments before any of the Solid Waste Management Units (SWMUs) in the report can be considered for a Corrective Action Complete determination.</p>			
<p>WSMR Introductory Statement: Although WSMR has made an effort to answer the NMED comments as given, focus needs to be placed on the Corrective Action Process and assessing if the site poses unacceptable risk based on detected concentrations of potential contaminants as compared to site conditions. The risk posed by given site conditions depends on the exposure scenario given. In many cases, given the on-going mission of WSMR, an industrial use scenario would be appropriate, however, for the Main Post Phase III RFI, WSMR has used a residential exposure scenario as a surrogate for testing a finding of unrestricted use.</p> <p>WSMR believes that results of the Main Post Phase III RFI Baseline Risk Assessment (BRA) indicate that the observed arsenic concentrations do not pose an unacceptable risk for future residential land use. Results of the BRA indicated risk less than 10^{-4} but greater than 10^{-5}. WSMR used the criterion of 10^{-4} (cancer) and <1.0 (HQ) as cutoffs for acceptable risk, as specified in EPA 1991. However, for SWMU sites with arsenic concentrations greater than background and Residential SSL, but below the Industrial SSL, WSMR will petition for Corrective Action Complete (CAC) with controls rather than conduct additional corrective measures to achieve residential clean up levels (Residential SSLs as specified by NMED). WSMR has followed risk assessment guidance including: <i>Risk Assessment Guidance for Superfund Volume I, Part A, Human Health Evaluation Manual (EPA, 1989)</i>; <i>Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions (EPA, 1991)</i>; and <i>Technical Background Document for Development of Soil Screening Levels, Revision 4.0 (NMED, 2006)</i>.</p>			

Response to NMED NOD -- NOTICE OF DEFICIENCY PHASE III RCRA FACILITY INVESTIGATION REPORT MAIN POST MULTIPLE SITES (SWMUs 8-17, 21, 22, 80, 140, AND 156) WHITE SANDS MISSILE RANGE, EPA ID NO. NM2750211235 HWB-WSMR-06-003, 8 December 2006

Number	NMED Comments	WSMR Response	Discussion
1	<p>The primary constituent of concern at the subject SWMUs is arsenic. In most cases, the arsenic levels detected in soils collected from the SWMUs are significantly greater than background. The established background mean value of 2 mg/kg arsenic appears low and atypical of regional, naturally occurring arsenic levels. It appears that an inappropriate background level may have been established as opposed to their being elevated levels of arsenic resulting from site activities at these SWMUs. If an appropriate background concentration for arsenic cannot be established and used to demonstrate that site concentrations are in fact representative of naturally occurring levels, then industrial closure may be warranted for all or most of the SWMUs contained in the report.</p> <p>A primary concern of NMED is that the Permittee concludes that the background data are not of a similar population to the SWMU and, therefore, are not appropriate for comparison purposes. It is possible that the background samples analyzed were collected from fill material, either native to the area or not native to the sites, based on the fact that the background samples appear to have been collected very close to the edges of roadways. If this is the case, resulting background values could be significantly different from the concentrations detected at the SWMUs.</p> <p>To investigate the inappropriate background values, the Permittee must address the following:</p> <ul style="list-style-type: none"> • Provide a detailed description of the soil samples that were used to establish background values. Appendix B of the September 2004 <i>Final Background Soils RCRA Facility Investigation Report for the Main Post</i> provided Main Post soil descriptions as described in the <i>Soil Survey for White Sands Missile Range</i>. These descriptions are not adequate to determine if fill was sampled or some other type of biased sampling was conducted, • Address the specific geologic units at each SWMU and provide a discussion of the differences between the soil/geology at each SWMU as compared to the background sample soil/geology, and • If the SWMUs and background samples were collected from different soil/geologic units, discuss whether or not additional background sampling (perhaps for each SWMU) is warranted to establish background reference values appropriate for each soil type present at each SWMU. 	<p>Although the arsenic concentrations detected during the Phase III RFI vary significantly from the mean of the concentrations from the background study, WSMR reiterates that no known sources of arsenic were disposed at these sites. The higher than background and residential SSL detections were used in the BRA (Section 5.0 of the report) to calculate risk to future on-site residents.</p> <p>The results of the Phase III RFI BRA indicate that the observed arsenic concentrations do not pose an unacceptable risk for residential land use.</p> <p>However, for SWMUs where arsenic concentrations are greater than background and the Residential SSL, but below the Industrial SSL, WSMR will petition for Corrective Action Complete with controls.</p>	<p>The Main Post Background Study was completed according to an NMED approved work plan (BAE Systems, 2003). Although the scale of Figure 4-1 in the background report (BAE Systems, 2004) makes it appear that sample locations are right next to roadways, in actuality, sample locations were chosen at least 50 ft from roadways in areas that visually appeared undisturbed.</p> <p>WSMR believes that variation in soil/lithology exist within the same mapped soil units, thus variations in described lithology from the background study and the Phase III RFI may exist. Therefore there is no need to reinvestigate background values.</p>

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Number	NMED Comments	WSMR Response	Discussion
2	<p>After completion of additional soil removal activities at SWMU 21 to reduce lead and total petroleum hydrocarbon (TPH) contamination, confirmation samples were collected from the east and west sidewalls and the base of the excavation area. As noted in Table 10, arsenic was included as an analyte for analysis. The results from the confirmation sampling, as summarized in Table 10, indicate that arsenic levels were between 1.21 and 1.71 mg/kg. These levels of arsenic are significantly lower than the confirmation samples collected and summarized in Table 8 for the same SWMU. Further, the significance of the difference in magnitude between these two sets of arsenic sample data for the same site are contrary to the conclusion that the background sample population and the SWMU 21 sample population are different. The discussion of the background comparison provided on page 25 indicates that the mean Phase III arsenic concentration is 10.9 mg/kg is not due to site activities but is representative of a different background. However, the second set of confirmation samples for arsenic at the same site were below the established background concentration of 2.0 mg/kg.</p> <p>The permittee must address why there is such a discrepancy between arsenic data collected during two separate confirmation sampling events at SWMU 21.</p>	<p>WSMR concurs that the data sets have significant differences, however, WSMR could find no QA/QC reason for discounting the laboratory data.</p> <p>The results of the BRA indicate that the observed arsenic concentrations do not pose an unacceptable risk for residential land use.</p> <p>However, for SWMUs where arsenic concentrations are greater than background and the Residential SSL, but below the Industrial SSL, WSMR will petition for Corrective Action Complete with controls.</p>	<p>Both Phase III RFI sample sets were analyzed by the same analytical laboratory using the same techniques. QA/QC data provided by the laboratory for each data set were internally consistent and did not indicate problems with the data. It is unknown why the data sets are different.</p> <p>It should be noted that there were inconsistencies in arsenic concentrations detected between the Phase I and Phase II RFIs at the SWMUs. The Phase I arsenic detections were generally consistent with the background value (BAE Systems, 2004) while the Phase II arsenic concentrations were significantly higher. It should also be noted that the Phase I and II RFI used the same analytical method (EPA 7060) which differed from the Phase III RFI (SW846 6010B).</p>

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Number	NMED Comments	WSMR Response	Discussion
3	<p>Table 28 presents the highest concentration with an exposure scenario depth for each SWMU that was used in the baseline risk assessment. For those SWMUs where the exposure point concentration (EPC) was based upon either RFI phase I or Phase II data, the EPC could not be verified, as these data were not provided with the report. However, there appear to be discrepancies related to the EPCs for SWMU 21. An EPC of 9.03 mg/kg is listed for all three receptors. In reviewing the SWMU 21 data provided in Table 8 on page 24, a datum of 9.03 mg/kg is not listed. In addition, the human health evaluation used 16 mg/kg as the EPC (i.e., the 95% UCL) for arsenic, while the ecological risk assessment identified an outlier in the data and stated that the 95% UCL should be 8.9 mg/kg. Further, Table 8 indicates the following concentrations for the resident, industrial worker, and construction worker, respectively: 27.1 mg/kg, 27.1 mg/kg, and 10.6 mg/kg.</p> <p>The Permittee must clarify the discrepancies in the EPC listed in Section 4.0 versus Section 5. In addition, clarify why the confirmation data provided in Table 8 were not applied in determining the EPCs for SWMU 21.</p>	<p>An EPC of 8.70 mg/kg (Table 29) was used for SWMU 21. The confirmation data in Table 8 was used to calculate the EPC for SWMU 21. See discussion to right.</p> <p>Data used to calculate the EPC from the previous RFIs are included in the Excel table titled <u>arsenic concentrations</u>, included in Appendix I to the report.</p>	<p>Table 28 was merely used to show the highest concentration detected at each exposure depth for the residential, industrial, and construction worker scenarios as compared to the appropriate NMED SSL to determine if a BRA would be required for the site.</p> <p>Table 28 lists the highest concentration detected for the exposure scenarios, not the EPC. However, the 9.03 mg/kg detection listed for SWMU 21 is an error. Discounting the surface concentration of 27.1 mg/kg (possible outlier), the highest concentration of residential exposure (near surface), thus the value in the table, should be 9.01 mg/kg.</p> <p>Table 29 in the report lists the calculated 95% UCL (used as the EPC) for calculation of risk in the BRA. The EPC for SWMU 21 in Table 29 was calculated using data listed in Table 8. See outlier discussion under comment number 4.</p>

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Number	NMED Comments	WSMR Response	Discussion
4	<p>In determining the UCL for surface soil at SWMU 21, the datum of 27.1 mg/kg (arsenic) was indicated as being an outlier. However, it does not appear that any statistical tests were conducted to confirm that this datum should be labeled as an outlier. A simple test based upon the median of absolute deviation about the median was applied to determine if the 27.1 mg/kg datum is an outlier. The results of this cursory analysis indicated that it is not an outlier. (Refer to http://ewr.cee.vt.edu/environmental/teach/smprimer/outlier.html).</p> <p>Another simple test is to apply two or 2.5 times the standard deviation plus the mean. Applying the factors of two and 2.5 results in a value of 25.26 mg/kg and 28.92 mg/kg, respectively. It is, therefore, not clear whether or not this datum is an outlier. Given the sample number of sample points, it appears that there may not be sufficient data to conduct a robust outlier test.</p> <p>The Permittee must justify how the datum of 27.1 mg/kg was deemed an outlier. It is also noted that for the comparison to NMSSLs, the datum of 27.1 mg/kg was conservatively included in the derivation of the UCL (Page 26 of the report). However, in developing the EPC for the baseline risk assessment, this datum was excluded from the analysis. The Permittee must explain why this datum was not treated consistently throughout the report.</p>	<p>WSMR concurs that the report may have been confusing as to the EPC value used for the BRA. Additionally, WSMR concurs that the 27.1 mg/kg detection may not be an outlier. The simple test of 2 times the standard deviation was applied, however, the data set excluding the believed outlier was used.</p> <p>WSMR calculated the EPC using the data set with and without the believed outlier. Both data sets were carried forward for calculation of risk. See discussion to right.</p>	<p>WSMR concurs that 27.1 mg/kg may not have been an outlier, therefore, in the Phase III RFI report, 2 separate EPCs were calculated for the data and used for comparison. The first EPC, listed in Table 29 as 8.70 mg/kg was calculated without 27.1 mg/kg in the data set. The second EPC, noted as 16 mg/kg in a Table 29 footnote was calculated using 27.1 mg/kg in the data set. Both EPCs were used in the BRA for comparison and carried forward for calculation of risk. Table 35 lists risk based on using both EPCs (see footnote to Table 35).</p> <p>All values calculated for the BRA were not deemed to pose an unacceptable risk to future on-site residents.</p>
5	<p>Table 29 presents the EPC that were used in the baseline risk assessment. It is noted that the table lists the EPC for arsenic at SWMU 14-15 as 6.37 mg/kg. However, in the spreadsheet associated with Appendix I (Exposure Calculations Age-Weighted Resident), the EPC applied at SWMUs 14-15 was 9.3 mg/kg.</p> <p>The permittee must clarify this discrepancy.</p>	<p>WSMR concurs with NMED that the discrepancy was not adequately explained in the report. The discrepancy is explained in the discussion to the right.</p>	<p>Due to the low detection frequency for the data set (6 detections out of 11 samples - see Table 29), WSMR used the maximum detection of 9.3 mg/kg to calculate the risk in the BRA as an added measure of conservatism. The results of the BRA indicate that the maximum arsenic concentration used as the EPC does not pose an unacceptable risk for residential land use.</p>

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Number	NMED Comments	WSMR Response	Discussion
6	For any metal detected above current background and at concentrations between residential and industrial NMSSLs, the Permittee may choose to petition for Corrective Action Complete with Controls status rather than conduct additional corrective measures to achieve residential clean up levels.	WSMR concluded that the results of the Main Post Phase III RFI BRA indicated that the observed arsenic concentrations do not pose an unacceptable risk for residential land use. However, for SWMU sites with arsenic concentrations greater than background and the Residential SSL, but below the Industrial SSL, WSMR will petition for Corrective Action Complete (CAC) with controls rather than conduct additional corrective measures to achieve the residential clean up level (residential SSL).	<p>The risk posed by given site conditions depends on the exposure scenario chosen. In many cases, given the on-going mission of WSMR, an industrial use scenario would be appropriate, however, for the Main Post Phase III RFI, WSMR has followed NMED requirements and used a residential exposure scenario as a surrogate for testing a finding of unrestricted use.</p> <p>WSMR believes that the BRA for the SWMUs listed under the Main Post Phase III RFI has shown that the observed arsenic concentrations do not pose an unacceptable risk to future on-site residents.</p>

REFERENCES

- BAE Systems 2003. *Background Soils RCRA Facility Investigation Work Plan for the Main Post, White Sands Missile Range*. July 2003.
- BAE Systems 2004. *Background Soils RCRA Facility Investigation Report for the Main Post, White Sands Missile Range*. August 2004
- EPA 1989. *Risk Assessment Guidance for Superfund Volume I, Part A, Human Health Evaluation Manual*. [RAGS A] OSWER 9285.7-02B, EPA/540/I-89/009. December 1989.
- EPA 1991. *Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions*. OSWER Directive 9355.0-30. Office of Emergency and Remedial Response U.S. Environmental Protection Agency. April 1991.
- NMED 2006. *Technical Background Document for Development of Soil Screening Levels, Revision 4.0*. New Mexico Environment Department Hazardous Waste Bureau and Ground Water Quality Bureau. June 2006.
- WTS 2006. *Phase III RFI Report for Main Post Multiple Sites, SWMUs 8-17, 21, 22, 80, 140, and 156 (IRP Sites WSMR #s 30-33, 36, 57, 60, 73, 74, 79, and 84)* May 2006.

Main Post Phase III RFI Screening Level Evaluation				
Site	Arsenic Detections*	NMED Screening Level Evaluation**	Human Health Risk Conclusion	WSMR Conclusion
STP Sludge Waste Pile SWMU 80 (WSMR 30)	0-2 ft depth 0.67 mg/kg (Phase I RFI data) 4-4.5 ft depth 12.9 mg/kg (Phase III RFI data)	The highest detection of arsenic within the residential/industrial site worker exposure depth of 0-2 ft bgs is below the NMED residential SSL of 3.9 mg/kg. Additionally, the highest detection within the construction worker exposure depth is below the NMED construction SSL of 85.2 mg/kg	Protected to Residential. Unrestricted Use.	No Further Action
Main Post Former FFTA SWMU 21 (WSMR 31)	The exposure point concentration (EPC) (95% UCL) is 16 mg/kg (Phase III RFI data) as calculated from the surface samples collected.	The EPC of 16 mg/kg for the surface samples collected is higher than the NMED residential SSL of 3.9 mg/kg. This EPC is also used for comparison to industrial/site worker and construction worker scenarios. The EPC of 16 mg/kg is below the industrial/site worker and construction worker SSLs of 17.7 mg/kg and 85.2 mg/kg, respectively.	Protected to Industrial/Site Worker Land Use	No Further Action with Controls
Main Post Former FFTA Waste Pile SWMU 22 (WSMR 32)	The EPC (95% UCL) is 9.66 mg/kg (Phase III RFI data) as calculated from the surface samples collected.	The EPC of 9.66 mg/kg for the surface samples collected is higher than the NMED residential SSL of 3.9 mg/kg. This EPC is also used for comparison to industrial/site worker and construction worker scenarios. The EPC of 9.66 mg/kg is below the industrial/site worker and construction worker SSLs of 17.7 mg/kg and 85.2 mg/kg, respectively.	Protected to Industrial/Site Worker Land Use	No Further Action with Controls
Used Battery Accumulation Area SWMU 14-15 (WSMR 33)	The EPC (95% UCL) is 6.37 mg/kg (Phase II RFI data) as calculated from the surface samples collected.	The EPC of 6.37 mg/kg for the surface samples collected is higher than the NMED residential SSL of 3.9 mg/kg. This EPC is also used for comparison to industrial/site worker and construction worker scenarios. The EPC of 6.37 mg/kg is below the industrial/site worker and construction worker SSLs of 17.7 mg/kg and 85.2 mg/kg, respectively.	Protected to Industrial/Site Worker Land Use	No Further Action with Controls
POL Sump at Bldg 1794 SWMU 8-9 (WSMR 36)	Arsenic was not detected at this site from 0 – 10 ft bgs at a laboratory reporting limit ranging from 2.52 mg/kg to 2.73 mg/kg (Phase II RFI data)	Arsenic was not detected in relevant exposure depths (0 -2 ft bgs for residential/industrial site worker; 0 – 10 ft bgs for construction worker).	Protected to Residential. Unrestricted Use.	No Further Action
UST SUMP, Wash Pad, and Drain at Bldg 1778 SWMU 12-13 (WSMR 60)	Arsenic was not detected at this site from 0 – 2 ft bgs at a laboratory reporting limit ranging from 2.54 mg/kg to 2.67 mg/kg. Arsenic was detected at 7.7 mg/kg at 9.5 ft bgs (Phase II RFI data).	Arsenic was not detected within the 0 – 2 ft exposure depth for residential/industrial site worker use. Arsenic was detected in the construction worker exposure depth of 9.5 ft bgs at a concentration below the NMED construction worker SSL of 85.2 mg/kg.	Protected to Residential. Unrestricted Use.	No Further Action
Former Waste Oil Tank/Sump at Bldg 1778 SWMU 10-11 (WSMR 74)	Arsenic was not detected at this site from 0 – 10 ft bgs at a laboratory reporting limit ranging from 2.51 mg/kg to 2.56 mg/kg (Phase II RFI data)	Arsenic was not detected in relevant exposure depths (0 -2 ft bgs for residential/industrial site worker; 0 – 10 ft bgs for construction worker).	Protected to Residential. Unrestricted Use.	No Further Action

Main Post Phase III RFI Screening Level Evaluation				
Site	Arsenic Detections*	NMED Screening Level Evaluation**	Human Health Risk Conclusion	WSMR Conclusion
Former Golf Course Pesticide Storage Shed SWMU 156 (WSMR 57)	Arsenic was detected at a highest concentration of 3.2 mg/kg (Phase I RFI data) in one surface sample. Arsenic was not detected during the Phase II RFI.	The highest detection of arsenic (3.2 mg/kg) within the residential/industrial site worker exposure depth of 0-2 ft bgs and the construction exposure depth of 0 – 10 ft bgs is below the NMED residential SSL of 3.9 mg/kg.	Protected to Residential. Unrestricted Use.	No Further Action
Waste Underground Injection Pipe SWMU 17 (WSMR 73)	Arsenic was detected at a highest concentration of 4.7 mg/kg (Phase I RFI data) in one surface sample. Arsenic was not detected during the Phase II RFI.	The highest detection of arsenic (4.7 mg/kg) within the residential/industrial site worker exposure depth of 0-2 ft bgs and the construction exposure depth of 0 – 10 ft bgs is above the NMED residential SSL of 3.9 mg/kg but below the industrial site worker SSL of 17.7 mg/kg.	Protected to Industrial/Site Worker Land Use	No Further Action with Controls
Heavy Equipment Wash Pad and Drain SWMU 16 (WSMR 79)	Arsenic was detected at a highest concentration of 7.9 mg/kg (EPC for data set 6.3 mg/kg) (Phase I RFI data)	The highest detection of arsenic (7.9 mg/kg) within the residential/industrial site worker exposure depth of 0-2 ft bgs and the construction exposure depth of 0 – 10 ft bgs is above the NMED residential SSL of 3.9 mg/kg but below the industrial site worker SSL of 17.7 mg/kg.	Protected to Industrial/Site Worker Land Use	No Further Action with Controls
LC-37 Paint Dump SWMU 140 (WSMR 84)	0-2 ft depth 2.5 mg/kg (Phase II RFI data) 8-8.5 ft depth 7.33 mg/kg (Phase III RFI data)	The highest detection of arsenic within the residential/industrial site worker exposure depth of 0-2 ft bgs is below the NMED residential SSL of 3.9 mg/kg. Additionally, the highest detection within the construction worker exposure depth is below the NMED construction SSL of 85.2 mg/kg	Protected to Residential. Unrestricted Use.	No Further Action

*Highest detection for site noted or exposure point concentration. RFI Phase number for detection given in parentheses. All data reported/summarized in the Phase III RFI (*Phase III RFI Report for Main Post Multiple Sites, SWMUs 8-17, 21, 22, 80, 140, and 156 (IRP Sites WSMR #s 30-33, 36, 57, 60, 73, 74, 79, and 84) May 2006*).

** The exposure depth for residential land use (SSL = 3.9 mg/kg) and industrial/site worker land use (SSL = 17.7 mg/kg) is 0 – 2 ft below ground surface. The exposure depth for construction worker land use (SSL = 85.2 mg/kg) is 0 – 10 ft below ground surface.