Erich,

Stan agreed that we should use the old PRG table. He said that even if we use the previous PRG table, it still may make sense to apply updated toxicity values for specific chemicals that may be risk drivers. At this point, we don't know if this would be an issue or not, but wanted to keep the option open. And to tell you the truth, I would rather you give us the work as it exists now, and if we want you to recalculate anything based on new tox values, we'll say so in our agency comments. Let's get this thing moving!

-Dante

----- Forwarded by Dante Rodriguez/R9/USEPA/US on 05/06/2005 03:25 PM -----

Erich -

Hear hear! I say we stick with what we started with! Darn changing standards! (Hopefully Stan will let us get by with that).

Stan - What do you think? Hard to keep changing our work every time a standard changes.

-Dante

Erich_Weaver@URSCorp.com

Hi Dante

EPA has issued a revised list of PRGs since we issued the Del Amo Soil and NAPL RI Report. Review of the web site info (http://www.epa.gov/region09/waste/sfund/prg/index.htm) indicates there are a fair number changes that could affect the text, tables and figures in the report.

The changes could be made of course, but it would not be a trivial effort. Furthermore, there is also the issue of the data presentation figures in
the Risk Assessment, which are currently based on the previous (2002) PRGs. It seems obvious that the two reports should at least be consistent in their presentation of the data.

To avoid further delays and additional cost, the Respondents would prefer to maintain the existing 2002 based PRG screening criteria. Would this be acceptable to EPA?

Please give us a call here to discuss, as appropriate.

regards,

Erich Weaver
URS Corporation
130 Robin Hill Rd
Santa Barbara CA 93117
805-964-6010
FAX 805-9640259