

Part IV

Calculation of Method B and Method C Cleanup Levels for Petroleum Mixtures

Introduction

Cleanup levels for Total Petroleum Hydrocarbon (TPH) mixtures are determined using the fractionated analytical approach. This approach divides the petroleum mixture into equivalent hydrocarbon numbers. Use of the fractionated approach requires the determination of the composition of the petroleum mixture.

Cleanup levels for petroleum mixtures are dependent on the composition of the mixture.

Method A cleanup levels for petroleum mixtures provided in Table 720-1 (Method A Ground Water Cleanup Levels), Table 740-1 (Method A Soil Cleanup Levels for Unrestricted Land Use) and Table 745-1 (Method A Soil Cleanup Levels for Industrial Land Use) are based on **assumed compositions**.

Method B and Method C cleanup levels for petroleum mixtures are based on **site-specific compositions**. Identifying the composition requires a site-specific analysis of either the contaminated medium or the source of the contamination (either the product released or another contaminated medium). See Table 830-1 for a list of contaminants to test for when establishing cleanup levels for petroleum mixtures.

Because cleanup levels for petroleum mixtures are dependent of the composition of the mixture and because the composition must be determined on a site-specific basis, **CLARC does not provide pre-calculated standard Method B or C formula values for petroleum mixtures**.

To calculate soil and ground water cleanup levels for petroleum mixtures, the assessor should use the Workbook and associated User's Guide (Publication No. 01-09-073) provided by the Department of Ecology.

Establishing Cleanup Levels for Petroleum Mixtures

Ground Water

Cleanup levels must be established for the total petroleum hydrocarbon (TPH) mixture as a whole, as well as for individual hazardous substances (TPH components) within the mixture, such as benzene, ethylbenzene, toluene, and xylene.

Under Method B and Method C, the cleanup levels for individual TPH components are established just like they would be for any other hazardous substance.

To establish a site-specific TPH cleanup level under Method B or Method C, the composition of the petroleum mixture in the ground water must be determined. Determining the composition requires the analysis of either the ground water or the source of the contamination (the product itself or contaminated soil) for petroleum fractions and other toxic components likely to be present. See Table 830-1 for a list of contaminants to test for when establishing cleanup levels for petroleum mixtures. If the analysis is based on the product or contaminated soil composition, a ground water composition must be predicted using a fate and transport model under WAC 173-340-747, such as the 3-phase or 4-phase model.

The actual or predicted ground water composition is used in Equation 720-3 to calculate a total petroleum hydrocarbon (TPH) cleanup level that takes into account the combined noncarcinogenic effects of the petroleum mixture. This TPH cleanup level may need to be adjusted downward to take into account the cleanup levels for individual petroleum components. A further adjustment may be necessary if modeling or ground water monitoring indicates biological degradation of residual petroleum would result in violation of the drinking water standards for other chemicals. This is most likely to be a concern for naturally occurring metals such as arsenic, iron and manganese that can be brought into solution by depletion of oxygen in the ground water during petroleum degradation.

See WAC 173-340-720 (4)(b)(iii)(C) and (5)(b)(iii)(C).

Surface Water

Cleanup levels must be established for the total petroleum hydrocarbon (TPH) mixture as a whole, as well as for individual hazardous substances (TPH components) within the mixture, such as benzene, ethylbenzene, toluene, and xylene.

Under Method B and Method C, cleanup levels for individual TPH components are established just like they would be for any other hazardous substance.

To establish a site-specific TPH cleanup level under Method B or Method C, the

composition of the petroleum mixture in the surface water must be determined. Determining the composition requires the analysis of the surface water or the source of the petroleum contamination (the product itself or contaminated soil or ground water) for petroleum fractions and other toxic components likely to be present. See Table 830-1 for a list of contaminants to test for when establishing cleanup levels for petroleum mixtures. If the analysis is based on the source of the contamination, a water phase composition must be predicted using a fate and transport model under WAC 173-340-747, such as the 3-phase or 4-phase model.

The actual or predicted water composition is used in a risk assessment equation to calculate a cleanup level that takes into account the combined human health risk of the petroleum mixture. This equation is not specified in the regulation. However, an acceptable equation may be obtained from Ecology. This cleanup level may need to be adjusted downward to take into account the cleanup levels of the individual petroleum components.

As an alternative to calculating a site-specific TPH cleanup level, the regulation allows for the use of the applicable TPH ground water cleanup levels in Table 720-1. Use of these values would avoid the need to conduct fractionated petroleum analyses.

The cleanup levels for TPH and the TPH components must also be at least as stringent as concentrations that are protective of fish and aquatic life, as well as wildlife, just as for any other hazardous substance. Whole effluent toxicity (WET) testing may be used to demonstrate that a concentration is protective of fish and aquatic life. Other methods may need to be used to demonstrate that a concentration is protective of wildlife, if this is a concern at the site.

See WAC 173-340-730(3)(b)(iii)(C) and (4)(b)(iii)(C).

Soil

Cleanup levels must be established for the total petroleum hydrocarbon (TPH) mixture as a whole, as well as for individual hazardous substances (TPH components) within the mixture, such as benzene, ethylbenzene, toluene, and xylene.

To establish a site-specific TPH cleanup level under Method B or Method C, the composition of the petroleum mixture in the soil must be determined. Determining the composition requires the analysis of either the soil or the product released for petroleum fractions and other toxic components likely to be present. See Table 830-1 for a list of contaminants to test for when establishing cleanup levels for petroleum mixtures.

- **Direct Contact Pathway:** For petroleum mixtures, the regulation requires a concurrent evaluation of ingestion and dermal absorption. The petroleum mixture composition is used in Equation 740-3 (or, if using Method C, Equation 745-3) to calculate a protective concentration for TPH that takes into account the combined noncarcinogenic effects of the petroleum mixture. Protective concentrations for

individual TPH components are established using Equations 740-4 and 740-5 (or, if using Method C, Equations 745-4 and 745-5). The TPH concentration may need to be adjusted downward to take into account the protective concentrations for individual TPH components. See WAC 173-340-740(3)(b)(iii)(B)(III) and 173-340-745(5)(b)(iii)(B)(III).

- **Leaching Pathway:** Protective concentrations for TPH and the TPH components must be established using the methods described in WAC 173-340-747.
- **Vapor Pathway:** Since TPH and TPH components contain volatile organic compounds, the vapor pathway must be evaluated whenever one of the conditions specified in the regulation exists at a site. Protective concentrations may be determined using one or more of the methods described in the regulation.

In addition to accounting for human health impacts, soil cleanup levels for TPH and the TPH components must also account for any potential impacts to terrestrial ecological receptors (plants and animals), just as for any other hazardous substance.

Air

Cleanup levels must be established for the total petroleum hydrocarbon (TPH) mixture as a whole as well as for individual hazardous substances (TPH components) within the mixture, such as benzene, ethylbenzene, toluene, and xylene.

Under Method B and Method C, the cleanup levels for individual TPH components are established just like they would be for any other hazardous substance.

To establish TPH cleanup levels under Method B or Method C, the composition of the petroleum mixture in the air must be determined. Determining the composition requires the analysis of either the air or the source of the contamination (the product itself or contaminated soil or ground water) for petroleum fractions and other toxic components likely to be present. See Table 830-1 for a list of contaminants to test for when establishing cleanup levels for petroleum mixtures. If the analysis is based on the source of the contamination, a soil vapor composition must be predicted using a fate and transport model under WAC 173-340-747, such as the 3-phase or 4phase model.

The actual or predicted air composition is used to calculate a total petroleum hydrocarbon (TPH) cleanup level that takes into account the combined noncarcinogenic effects of the petroleum mixture. This equation is not specified in the regulation. However, an acceptable equation can be obtained from Ecology. This cleanup level may need to be adjusted downward to take into account the cleanup levels of any individual petroleum components.

See WAC 173-340-750(3)(b)(ii)(C) and (4)(b)(ii)(C).

Reference Doses for Petroleum Mixtures

Petroleum products are complex mixtures that include hundreds of compounds. How to estimate the toxicity of such mixtures was subject to considerable discussion throughout the rule-making process, involving the Department of Ecology, the Department of Health, the TPH Project Oversight Group (POG), the U.S. EPA, and numerous stakeholders. Based on this work, consensus was reached on three principles:

1. Where reference doses and cancer potency factors are available for individual substances that are part of the petroleum mixture, these values should be used for these substances.
2. The remainder of the mixture should be divided into several groups of substances, or fractions, and a reference dose assigned to each fraction based on known toxicological information about substances found in those fractions or with a similar chemical structure.
3. Because of the wide range of chemicals and potential health effects, the noncarcinogenic toxicity posed by the various fractions should be assumed to be additive for the purposes of estimating the toxicity of a petroleum mixture.

Based on information developed by the National TPH Criteria Working Group, it was determined that the mixture of substances should be split into two main groups – aliphatic hydrocarbons and aromatic hydrocarbons. Each of these main groups was then further subdivided into fractions with similar physical properties.

Initial reference doses were derived from work done by the National TPH Criteria Working Group and the Massachusetts Department of Environmental Protection. At the request of EPA Region 10, the EPA's National Center for Environmental Assessment (NCEA) reviewed these values and recommended some adjustments. These recommendations were endorsed by the POG and the MTCA Science Advisory Board and published in the November 2001, Version 3.1 of CLARC. After publication of Version 3.1 of CLARC, EPA's National Center for Environmental Assessment, Superfund Technical Support Center published the provisional risk assessment issue paper "Derivation Support Document for Total Petroleum Hydrocarbons" (SRC SF 01-031/10-16-2002). The following memoranda documents the deliberations between the Department of Ecology and EPA and the changes made to the table "Recommended Reference Doses for Petroleum Fractions and Individual Hazardous Substance", Part IV, published in Version 3.1 of CLARC, November 2001. The information in the table "Reference Doses For Total Petroleum Hydrocarbon (TPH) Fractions and Individual Hazardous Substances Related to TPH" is to be used to establish cleanup levels for petroleum mixtures consistent with the guidance "Calculation of Method B and C Cleanup Levels For Petroleum Mixtures."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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February 14, 2005

Reply to
Attn of: OEA-095

Craig M. McCormack, Pharm.D.
Toxics Cleanup Program
Department of Ecology
P. O. Box 47600
Olympia, WA 98504-7600

Dear Dr. McCormack:

Thank you for your letter of February 9, 2006, describing the changes to the table "Updated Reference Doses for Total Petroleum Hydrocarbon (TPH) Fractions and Individual Hazardous Substances Related to TPH." The updated table is to be incorporated into Ecology's Cleanup Levels and Risk Calculations under the Model Toxic Control Act regulations

The changes appear to be consistent with our discussions over the past few months. I concur with the changes made to the table and its footnotes and believe they represent appropriate interpretations of information available from the IRIS and HEAST databases and from EPA's National Center for Environmental Assessment, including the Superfund Technical Support Center.

Sincerely,

A handwritten signature in black ink that reads "Marcia L. Bailey".

Marcia L. Bailey, D Env.

cc: Patricia Cirone, Ph.D.



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February 9, 2006

Marcia Bailey, D.Env.
US EPA Region 10, MS: OEA-095
1200 6th Avenue
Seattle, Washington 98101

Dear Dr. Bailey:

The enclosed table, Updated Reference Doses For Total Petroleum Hydrocarbon (TPH) Fractions And Individual Hazardous Substances Related to TPH – Revised January 2006, consolidates our discussions, e-mails, and overall review of the reference doses appropriate for inclusion in the Department of Ecology's updated TPH table to be incorporated into the Cleanup Levels and Risk Calculations under the Model Toxics Control Act Cleanup Regulation (CLARC). This constitutes an update to the TPH CLARC table that was prepared with your support, in 2004. The information in the updated table will be used by the Department of Ecology's Toxics Cleanup Program to evaluate and develop cleanup levels for dangerous waste sites contaminated with petroleum and selected chemicals that may be associated with petroleum products.

The 2006 table recognizes updates that have been made to the EPA Integrated Risk Information System (IRIS) database as of January 2006 and information from EPA's National Center for Environmental Assessment, Superfund Technical Support Center (STSC). For individual hazardous substances, the following changes have been made to the revised January 2006 table:

- 1-Methylnaphthalene has been deleted from the table, because the oral reference dose (RfDo) is no longer supported by STSC. The toxicity of 1-methylnaphthalene in a mixture will now be accounted for by including its measured concentration in the aromatic fraction >EC 10 to EC 12 for both oral and inhalation pathways.
- 2-Methylnaphthalene remains in the table with an oral RfD of 0.004 mg/kg-day, supported on IRIS. 2-Methylnaphthalene is to be evaluated individually for oral exposure only. There is no inhalation RfD for 2-methylnaphthalene, because STSC does not recommend a route-to-route extrapolation for this chemical. The measured concentration of 2-methylnaphthalene should be included in the aromatic >EC 10-12 fraction for purposes of evaluating inhalation exposures.
- Toluene has an oral RfD of 0.08 mg/kg-day and an inhalation RfD of 1.4 mg/kg-day, supported by IRIS.



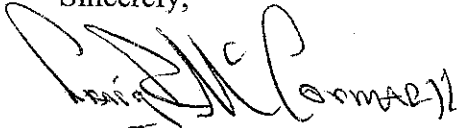
Dr. Marcia Bailey
February 9, 2006
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- N-hexane has an oral RfD of 0.06 mg/kg-day and an inhalation RfD of 0.2 mg/kg-day, supported by EPA's Health Effects Assessment Summary Table and IRIS, respectively.

For purposes of documentation, I would appreciate receiving from you, in writing, verification that the information in the enclosed table accurately reflects our mutual understanding and interpretation of the current technical information regarding measures of toxicity for TPH and related hazardous substances.

Thank you for your helpful and continued technical support.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig R. McCormack". The signature is stylized and written over a faint, larger version of the same name.

Craig R. McCormack, Pharm.D.
Toxics Cleanup Program

Enclosure

**Updated Reference Doses For Total Petroleum Hydrocarbon (TPH) Fractions
and Individual Hazardous Substances Related to TPH - Revised January 2006**

Equivalent Carbon (EC) Chain Length For TPH Fraction	Toxicity Surrogate Descriptive Of The TPH Fraction	Oral RfD (mg/kg-day)	Inhalation RfD (mg/kg-day) (4)	Documentation
Aliphatic TPH Fractions				
Aliphatic EC 5 to EC 6	Cyclohexane (1)	1.7	1.7	EPA / IRIS
Aliphatic >EC 6 to EC 8	Cyclohexane (1)	1.7	1.7	EPA / IRIS
Aliphatic > EC 8 to EC 10	See footnote (2)	0.03	0.085	(1)
Aliphatic > EC 10 to EC 12	See footnote (2)	0.03	0.085	(1)
Aliphatic > EC 12 to EC 16	See footnote (2)	0.03	0.085	(1)
Aliphatic > EC 16 to EC 21	White Mineral Oil	2	Not Applicable (3)	(4)
Aliphatic > EC 21 to EC 36	White Mineral Oil	2	Not Applicable (3)	(4)
Aromatic TPH Fractions				
Aromatic EC 5 to EC 8	BTEX Compounds, Toxicity Assessed Individually (5)	See individual chemical below	See individual chemical below	EPA / IRIS
Aromatic > EC 8 to EC 10	Isopropyl benzene (Cumene)	0.1	0.114	EPA / IRIS
Aromatic > EC 10 to EC 12	Naphthalene	0.02	0.00086	EPA / IRIS
Aromatic > EC 12 to EC 16	1,1 - Biphenyl	0.05	0.05 (6)	EPA / IRIS
Aromatic > EC 16 to EC 21	Pyrene	0.03	Not Applicable (2)	EPA / IRIS
Aromatic > EC 21 to EC36	Fluoranthene	0.04	Not Applicable (2)	EPA / IRIS
Reference Doses For Individual Chemicals With Noncancer Toxicities That May Be Associated with TPH*				
Chemical	Toxicity Surrogate Descriptive Of The TPH Fraction	Oral RfD (mg/kg-day)	Inhalation RfD (mg/kg-day) (7)	Documentation
2- methyl-naphthalene	No Surrogate Necessary	0.004	Include in Aromatic > EC 10- EC 12	EPA/IRIS, (8,9)
Benzene	No Surrogate Necessary	0.004	0.00855	EPA/IRIS
Ethylbenzene	No Surrogate Necessary	0.1	0.286	EPA/IRIS
Toluene	No Surrogate Necessary	0.08	1.4	EPA/IRIS
Xylene(s)	No Surrogate Necessary	0.2	0.029	EPA/IRIS
Styrene	No Surrogate Necessary	0.2	0.285	EPA/IRIS
1,2-dibromoethane	No Surrogate Necessary	0.009	0.00257	EPA/IRIS
n-hexane	No Surrogate Necessary	0.06	0.2	EPA/HEAST, IRIS
Methyl-tert-butyl-ether	No Surrogate Necessary	None	0.857	EPA/IRIS

- (1) Where n-hexane is quantitatively analyzed for as an individual chemical, use cyclohexane as the toxicity surrogate for the aliphatic EC 5 to EC 8 fraction, and assess n-hexane based on its own toxicity; if n-hexane is not quantitatively analyzed for as an individual chemical, use n-hexane toxicity as the toxicity surrogate for the entire fraction.
- (2) The Total Petroleum Hydrocarbon Criteria Working Group (TPHCWG) and EPA/NCEA PPRIV Derivation Support Document for Total Petroleum Hydrocarbons (SRC SF 01-031/10-16-2002). The oral reference dose (RfD) for the aliphatic fractions > EC 8 to EC 16 is based on TPHCWG's analysis of a mixture of alkanes and JP-8 fuel, plus a safety factor of 3 as recommended by NCEA/EPA. The inhalation RfD is based on the ATSDR chronic inhalation minimum risk level (MRL), as recommended by NCEA/EPA.
- (3) Not Applicable due to non-volatility
- (4) TPHCWG recommendation based on feeding studies of white mineral oils and EPA/NCEA PPRIV Derivation Support Document for Total Petroleum Hydrocarbons (SRC SF 01-031/10-16-2002).
- (5) BTEX: Benzene; Toluene; Ethylbenzene; Xylene(s); IRIS: Integrated Risk Information System developed by U.S. Environmental Protection Agency
- (6) The inhalation RfD for 1, 1 - biphenyl is a direct extrapolation from the oral RfD.
- (7) Derivation of inhalation RfDs from inhalation reference concentrations (RfCs) are based on the following:

$$\text{RfDi mg/(kg-day)} = \text{RfC (mg/m}^3\text{)} \times 20 \text{ m}^3/\text{day} \times 1/70 \text{ kg}$$
 where 20 m³/day is the assumed adult inhalation rate, and 70 kg is the assumed adult body weight
- (8) 2-Methylnaphthalene is included in the aromatic >EC 10 to EC 12 fraction when evaluating its hazards from inhalation exposure. 2-Methylnaphthalene does not have an inhalation RfD because STSC does not recommend route to route extrapolation from the oral RfD for this chemical. Use the oral RfD (0.004 mg/kg-day) for 2-methylnaphthalene when evaluating its hazards from the oral route of exposure, and subtract it from the aromatic >EC 10 to EC 12 fraction.

* The information provided in this table is for TPH-related chemicals with reference doses. As has been the case in the past, TPH-related chemicals with cancer potency factors only, or cancer potency factors in addition to reference doses, must be evaluated independently for purposes of estimating risks and calculating cleanup levels. In addition to benzene, these may include the following chemicals, if required to be analyzed, pursuant to Table 830-1 in MTCA: 1,2-dibromoethane, 1,2-dichloroethane, carcinogenic PAHs and PCBs. In addition, lead, which has neither a reference dose nor a cancer potency factor, must be evaluated based on prevention of unacceptable blood lead levels, when it is a potential contaminant at TPH sites.