

Attachment A
Correspondence from Department of Toxic Substances Control
Regarding Remediation of Parcel D
January 30, 1998



Cal/EPA

Department of
Toxic Substances
Control

1011 N. Grandview Ave
Glendale, CA 91201

EXPLANATION OF SIGNIFICANT DIFFERENCES

for

Union Pacific Railroad Company
Taylor Yard - Sale Parcel Site
Hump Yard Area
Los Angeles, California
January 30, 1998

Pete Wilson
Governor

Peter M. Rooney
Secretary
for Environmental
Protection

The Department of Toxic Substances Control (DTSC) has prepared the following Explanation of Significant Differences (ESD) for the Union Pacific Railroad Company, Taylor Yard - Sale Parcel Site, Hump Yard Area, located at 2800 Kerr Street, Los Angeles, California. The ESD has been prepared to document a change from the remedy selected in the Remedial Action Plan (RAP), for the Hump Yard Area. The "significant difference" refers specifically to a change in the RAP's requirement for a deed restriction on the Hump Yard's land use. Based on the findings of a new risk evaluation of the residual lead concentrations on the Hump Yard, it has determined that the residual lead concentrations do not pose a threat to human health and the environment and land use restrictions are not warranted. This change does not fundamentally alter the remedy selected in the RAP with respect to scope, performance or cost. This document has been prepared to pursuant to 40 Code of Federal Regulations, section 300.435 (c)(2)(i)

Background

A site investigation conducted at the Taylor Yard - Sale Parcel Site, in September 1991 indicated that elevated levels of both total and soluble lead were present in the Hump Yard soil. Pursuant to the RAP, soil that exhibited elevated soluble lead concentrations was treated by in situ fixation processing. In addition, soil cleanup levels for lead of 250 mg/kg for residential and unrestricted land use and 1,000 mg/kg of lead for restricted commercial/industrial land use, were established for the Site. Confirmation sampling of the treated soil indicated a mean total lead concentration of 294 milligrams per kilogram (mg/kg) was achieved. The 95% upper confidence limit (UCL) on the mean total lead concentration was calculated to be 340 mg/kg.

Based on these results, the RAP indicated that commercial or industrial development of the property could be undertaken without risk to public health. However, residential development would be precluded unless a risk assessment indicating no adverse public health impact was submitted to, and approved by, the DTSC.

Risk Assessment

In December 1997, ERM-West, Inc. performed a new risk evaluation pursuant to DTSC's LEADSPREAD model, to evaluate the residual lead concentrations in the treated Hump Yard soils. The LEADSPREAD model considers multiple pathways for potential exposure to lead for

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both adults and children through the estimation of blood lead concentrations. Typically, the LEADSPREAD model uses DTSC default values for inhalation, water ingestion and food ingestion, pathways which account for a high percentage of the overall lead intake. These default values are based on conservative overestimates of lead exposure to ensure the theoretical lead exposure will not be underestimated.

In addition to the use of the conservative default values, the following assumptions were considered in setting up the parameters for the LEADSPREAD analysis of the Hump Yard:

- The soil lead concentration was set equal to 340 mg/kg, the 95% UCL;
- Exposure assumptions were based on a single family residential scenario;
- No reduction of lead bioavailability was assumed; and
- The plant uptake option was set equal to zero, consistent with the current and planned property use.

The results of the risk evaluation indicated that for a defined population (adults and children), over 95% of the population would be expected to have a blood lead concentration below DTSC's recommended guideline blood lead level of 10 micrograms per deciliter (ug/dl). Specifically, the risk evaluation indicated that 99% of adults and 98% of children would have a blood lead concentration below 10 ug/dl.

The complete results of the risk evaluation may be found in ERM's Risk Evaluation Report dated January 19, 1998.

Summary

Pursuant to the RAP, DTSC had considered imposing a deed restriction on the Taylor Yard -Sale Parcel Site, Hump Yard Area. This deed restriction would restrict development of the Hump Yard Area to commercial and industrial uses. However, the findings of the new risk evaluation indicate that the residual lead concentrations would not pose an unacceptable risk if the Site were developed for residential or unrestricted use. In addition, the Site's current and future planned use is commercial/industrial. Therefore, no restriction of land use is warranted for the Taylor Yard - Sale Parcel, Hump Yard Area.

As stated in 40 CFR 300.435 (c)(2)(i), any change in remedial action selected in the RAP must be made public by publication of an explanation of significant differences. In this case, the change in remedial action is the deletion of the deed restriction requirement on the Hump Yard Area. A public notice that briefly summarizes the ESD will be published in one or more local newspapers. In addition, this document and all supporting information will be placed in the administrative record and the Site's information repositories.

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Explanation of Significant Differences Approval Record
for
Union Pacific Railroad Company
Taylor Yard - Sale Parcel Site
Hump Yard Area
Los Angeles, California

Original Signed by

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