ADEC Division of Spill Prevention and Response Contaminated Sites Program 18 AAC 75 Proposed Cleanup Level Amendments April 17, 2018 Questions received through April 16, 2018 Public Comment Period Ends 5:00pm April 26, 2018

**Q:** Are any of the equations changing?

A: None of the cleanup level equations are changing.

Q: What are the changes to the PCCL, PCCR, and RAPM?

A: The changes to the three adopted by reference documents are described below.

**PCCL:** Toxicity and/or physical parameters for a number of hazardous substances are updated with the most current data. The dispersion constants for the arctic zone are also changing due to an error in the previous version of the PCCL and cleanup level calculations. Some of the changes in toxicity and/or physical parameters result in no change to the cleanup levels, while others do result in a change. See the side-by-side sheet for a table of all cleanup levels that are changing.

The headings for the sections describing the inhalation equations have been corrected to indicate inhalation is for both volatiles and particulates. A footnote has been added to the PCCL clarifying that the term "Perfluorooctane Sulfonic Acid" includes both the acid and its salts. References to the PCCR and RAPM have been updated to the 2018 versions of those documents (also included in this regulations package). Ammonium Perchlorate is being replaced with Perchlorate and Perchlorate Salts and Manganese and Strontium are being added to the tables, as discussed in the formal amendments.

**PCCR:** The PCCR lists the method 2 cleanup level for each individual pathway for every hazardous substance. A number of cleanup levels are changing due to the updated toxicity and/or physical parameters. Some of these changes are reflected in the side-by-side table and some are not. That is because if the cleanup level changes for a pathway (inhalation, ingestion, or dermal exposure) that is not the risk driver, it may not affect the overall human health cleanup level.

A footnote has been added clarifying that the term "Perfluorooctane Sulfonic Acid" includes both the acid and its salts. References to the PCCL and RAPM have been updated to the 2018 versions of those documents (also included in this regulations package). Ammonium Perchlorate is being replaced with Perchlorate and Perchlorate Salts and Manganese and Strontium are being added to the tables, as discussed in the formal amendments

**RAPM:** The only changes to this document are to update the references to the PCCL and PCCR to the 2018 versions of those documents (also included in this regulations package), and to update other references to more current versions.

**Q:** Do the proposed Cleanup Level Amendments (18 AAC 75) Posted March 20, 2018 have any impact on the Method 2 Migration to Groundwater levels for Diesel Range Organics (DRO)?

**A:** None of the proposed changes impact the petroleum cleanup levels for diesel, gasoline, or residual range organics.