

PPC 9551.1991(04)

STANDARDS FOR AIR PATHWAY FOR METALS AND ORGANIC CHEMICALS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 30 1991

Mark J. Lupo, Ph.D.  
Manager, Applied Sciences  
K. W. Brown & Associates, Inc.  
500 Graham Road  
College Station, TX 77845

RE: Standards for Air Pathway for Metals and Organic Chemicals

Dear Dr. Lupo:

We have reviewed Tables 1 and 2 and the information you provided in your letter of January 11, 1991. In the tables, three of the columns (TWA, STEL, and Ceiling) are only applicable to OSHA standards. Although a petitioner does not have to make a demonstration of no-migration for the short term events, they must still certify compliance with the OSHA requirement. Attached are the most current levels for metals in the air phase.

The Health Based Level (HBL) for chromium is based on hexavalent chromium which is carcinogenic when inhaled. EPA determines exceedance based on the total volume of chromium using the hexavalent HBL. If BP Oil is to use only the amount of hexavalent chromium to determine exceedance, they must substantiate how these values are separated from total chromium.

Also attached are the most current standards for organics in the air phase. Three of the compounds in Table 2 do not relate to no-migration and have been deleted. 1-Methylnaphthalene and Indene are not Appendix VIII or IX compounds and 3-Methylcholanthrene, while an Appendix VIII compound, is not on the Modified Skinner List. These three compounds do not have Health Based Levels (HBL). Although Benzidine is not on the Modified Skinner List, it is an Appendix VIII constituent and has a HBL and is therefore included in the attachment.

Sincerely,

Newman Smith  
Disposal Technology Section  
Office of Solid Waste

cc: Terry Keiden, AB, OSW  
Athena Rodbell, AB, OSW

RO 13447