From:	POULSEN Mike
To:	Shephard, Burt
Cc:	DeMaria, Eva; LARSEN Henning; MCCLINCY Matt
Subject:	TPH Fractions
Date:	Thursday, October 20, 2016 4:47:19 PM
Attachments:	RE C10-C12 Question.msg

Burt –

Perhaps you thought we were done with TPH fraction discussions on Portland Harbor, but not so. DEQ is working through some issues related to compliance monitoring for groundwater at our upland sites. The EPA PRG for aliphatic hydrocarbons C_{10} – C_{12} has come up. A key question remains whether the range should be based on actual carbon numbers or equivalent carbon numbers ($EC_{>10}$ – EC_{12}). DEQ's position is that it should be based on equivalent carbons. In your attached email from December 2014, you advocated that actual carbons are more appropriate. I thought after our conference call at the end of February 2015 that you were OK with equivalent carbons. That is the practical way for chemists to do the analysis (as you discuss in your email). We can get acceptable alignment with the toxicology if we use an appropriate surrogate for the equivalent carbon range, or use average values for properties such as molecular weight, as was done by the TPH Criteria Working Group.

Once you have a chance to think about this issue, can I give you call? It would be good to include Henning Larsen. We are both fairly available next week. EPA would like to get your opinion before they decide how to respond to DEQ's comments on the PH FS. Thanks.

- Mike