

Jones, Adrienne/VBO

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Sent: Friday, July 16, 2010 7:24 PM
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Subject: EPA comments Site 21 RI addendum
Attachments: RIAddendum~Site21.doc

(See attached file: RIAddendum~Site21.doc)

EPA comments RE: Remedial Investigation Addendum Report for Site 21

1. Section 3, the first paragraph states that a VI investigation was planned for several sites including buildings 13 and 54 however, according to Figure 2-3 these two buildings have been demolished. Please address

2. Section 4.1.2, Subslab Vapor Project Action Limits. It is not appropriate to apply an attenuation factor (AF) to the Regional Screening Levels (RSLs). AF should only be applied to the actual sub-slab concentrations and the resulting concentration should then be compared to RSLs. This comment also pertains to Table 4-1.

3. To address the uncertainty of risk for the hypothetical new buildings EPA recommends that the proposed landuse controls that prevent construction of additional structures include a requirement that any new building erected on the site incorporate an appropriate vapor barrier or mitigation system to ensure that the vapors will not enter the buildings.