

Staszak, Janna/VBO

From: Doran, Karen (DEQ) [Karen.Doran@deq.virginia.gov]
Sent: Monday, March 29, 2010 9:41 AM
To: Jones, Adrienne/VBO; Bob Stroud; Staszak, Janna/VBO; Walter Bell
Subject: Site 21 decision tree - VDEQ comments
Attachments: image001.jpg; Draft Site 21 VI SAP decision tree - VDEQ comments.pdf

Team -

In the box stating, "Are dissolved arsenic concentrations less than or equal to baseline or MCL (whichever is higher)?" please change to "Are dissolved arsenic concentrations less than or equal to baseline levels?" If YES - move to another box that states, "Mobilization of arsenic from site remediation is not evident, initiate closeout for performance monitoring for arsenic." Then move to another box that states, "Are dissolved arsenic concentrations less than or equal to the MCL for two consecutive events?" If YES - move to the box that states, "No additional sampling is necessary. Initiate closeout."

If NO to the first question - move to the box that states, "Sample wells in which arsenic exceeds baseline levels for arsenic only."

If NO to the second question - move to a box that states, "Sample wells in which arsenic exceeds MCL for arsenic only."

See attached scanned decision tree for graphical changes.

Thanks for the opportunity to comment.

Karen M. Doran

Remedial Project Manager
Federal Facilities Program
Department of Environmental Quality
629 East Main Street
Richmond, VA 23219
phone - 804.698.4594
karen.doran@deq.virginia.gov

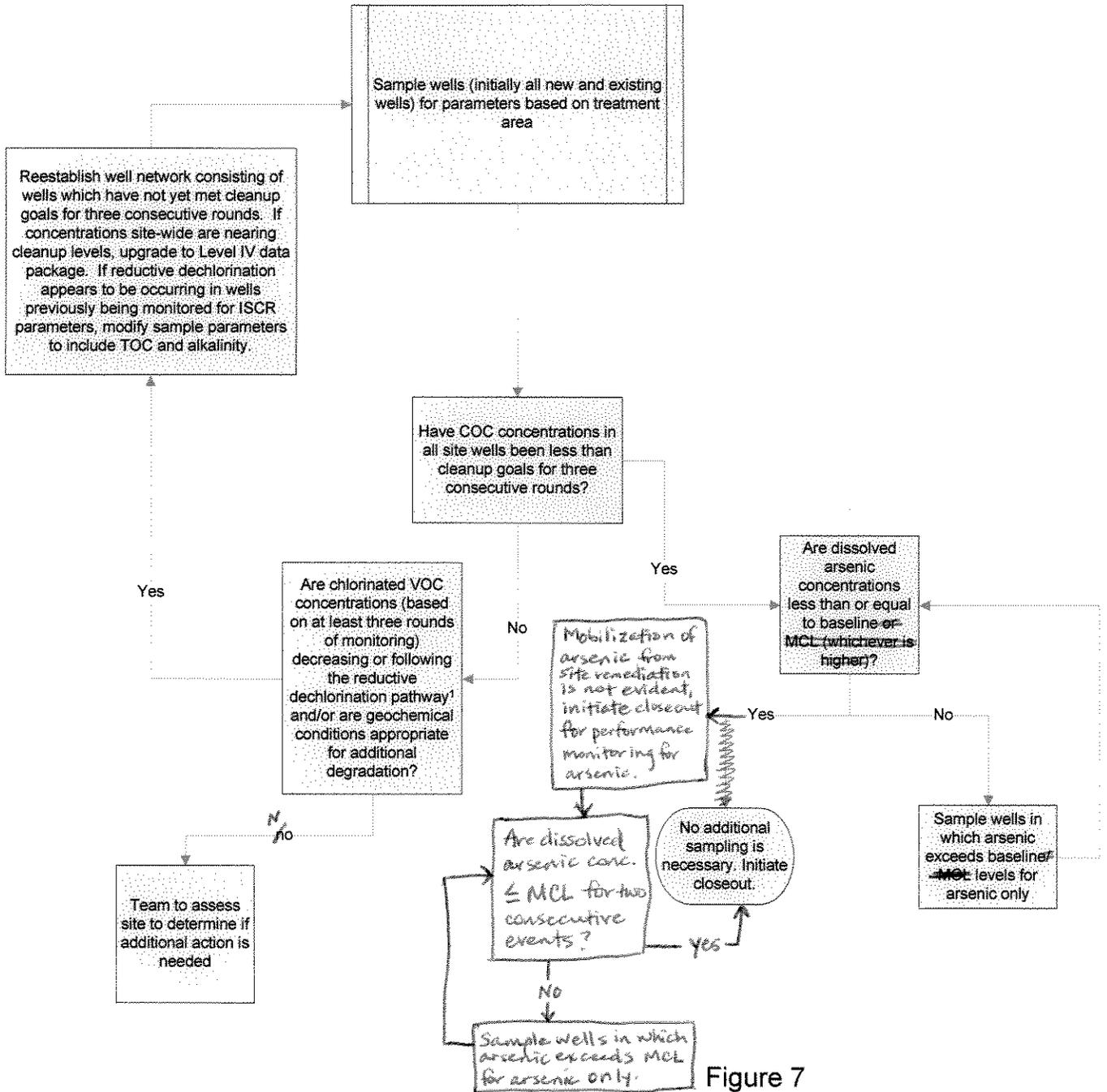


Figure 7
Decision Flow Chart for Sampling at Site 21
St. Juliens Creek Annex, Chesapeake, VA

¹ While ZVI is acting as a chemical reductive agent, it is anticipated that concentrations of all COCs in the source area may be decreased through chemical destruction. However, in the EVO treatment areas and in the ZVI treatment area once redox conditions are no longer low enough to allow for chemical destruction, it is anticipated that degradation will follow the reductive dechlorination pathway from TCE to DCE, vinyl chloride, and ethene. Consequently, it is likely that there will be temporary increased in daughter products (DCE and vinyl chloride). If sufficient data are available to make application of a statistical tool useful, the trend analysis (increasing or decreasing) may be completed using a method such as Mann-Kendall Analysis