

From: Doran, Karen [Karen.Doran@deq.virginia.gov]
Sent: Monday, June 22, 2009 9:41 AM
To: Jones, Adrienne/VBO; Staszak, Janna/VBO; John Burchette; Walter Bell
Subject: Site 21 VI SAP - VDEQ comments

Team -

Ahmet and I have reviewed the referenced document and submit the following VDEQ comments:

VDEQ RPM Comments

Typographical

1. Worksheet 9, subheading Worksheet #9-4, purpose - capitalize "creek"
2. Worksheet 9, subheading Worksheet #9-5, date - should say November 19, 2008
3. Worksheet 9-1, Site 21 Scoping Session, second sentence - worksheets should be one word
4. Worksheet 9-1, last sentence before Worksheet #10 - add period
5. Worksheet 9-4, last sentence before Statement from Tier II - change "bee" to "been"
6. Worksheet 9-4, Navy Rationale..., first bullet, fourth sentence - remove first "and"
7. Worksheet 9-4, Regulatory Rationale..., overview of discussion, third paragraph, second sentence from bottom - change "adjust" to "adjustment"
8. Worksheet 9-4, Regulatory Rationale..., overview of discussion, sixth paragraph, last sentence - change "re-evaluates" to "re-evaluate"
9. Worksheet 9-5, Site 21 Scoping Session, third sentence - change "is it" to "it is"
10. Worksheet 11, last bullet - remove last "to"

Technical

11. Worksheet 9, subheading Worksheet #9-4, purpose - add statement regarding the decision tree here since that was the main focus of the meeting
12. Worksheet 10, General Problems to Address, second to last bullet - we discussed that if the groundwater table was too shallow to collect subslab vapor samples we would wait a short period of time (two weeks, I think) to see if the groundwater elevation dropped - please capture this here and in the following locations:
 - Worksheet 10, last full paragraph
 - Figure 7, between Box 3 and Box 28

VDEQ Risk Assessor Comments

Worksheet #10 - Problem Definition

1. Page 59, second to last bullet point: It looks like an "if" is missing from the text of the sub-bullet. I believe it should state, "...however, if the groundwater table is too shallow to allow for the collection of subslab vapor samples..."
2. Page 60, last paragraph: More detail should be provided regarding the concept of "evaluating constituent ratios between the groundwater and indoor air samples, taking into account the vaporization potential of the COCs." How would this work? What process is envisioned by the authors? Note that this concept is also mentioned in Footnote 12 of Figure 7.

Worksheet #11 - Project Quality Objectives/Systematic Planning Process Statements

3. Page 62, second paragraph: The concept of using indoor air samples for current use and subslab vapor (SSV) samples for future use should be elaborated upon. How will SSV samples be used to predict indoor air Exposure Point Concentrations for future exposures? Note this concept is also presented in Box 14 of Figure 7.
4. Page 63: It is stated that air samples will be collected in Summa canisters over a 24 hour period. If the primary exposure pathway involves commercial/industrial receptors wouldn't an 8-10 hour sampling event be more applicable.
5. Page 66: Should possible sources of the background concentrations mentioned in the last bullet point be discussed so that agreement on their appropriateness can be reached? Note, national background levels are also mentioned in Footnote 12 of Figure 7.

Figure 7

6. In the boxes where residential or commercial screening levels are referred to would it be more appropriate to refer to Project Action Limits (PALs) as defined in Worksheet #11 instead of the more generic "screening levels" term?

-

Thank you 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
fax - 804.698.4234
kmdoran@deq.virginia.gov