

Staszak, Janna/VBO

From: Burchette.John@epamail.epa.gov
Sent: Tuesday, June 30, 2009 9:50 AM
To: walt.j.bell@navy.mil; Staszak, Janna/VBO; Jones, Adrienne/VBO;
Karen.Doran@deq.virginia.gov
Subject: EPA Comment on the Site 21 VI SAP
Attachments: Site 21 VI SAP Comments.doc

Attached are EPA Comments on the Site 21 VI SAP. EPA Air Protection Divisions Pat Florres assisted in the review (EPA APD Comment) in case that throws someone off. Thank you for the opportunity to review this document.

John Burchette(3HS11)

Remedial Project Manager

NPL/BRAC/Federal Facilities Branch

U.S. Environmental Protection Agency

1650 Arch Street

Philadelphia, PA 19103-2029

Phone: 215.814.3378

Fax: 215.814.3025

Burchette.john@epa.gov

EPA Comments
Site 21 Industrial Area Vapor Intrusion Sampling and Analysis Plan
St. Juliens Creek Annex
Chesapeake, VA

EPA RPM Comment 1: SAP Worksheet 2. Operable Unit per EPA Records is 12.

EPA RPM Comment 2: My email can be simplified to .john@epa.

EPA RPM Comment 3: Not that it really matters, but I should have been present for the Site 21 Scoping session on worksheet 9-1.

EPA RPM Comment 4: SAP Worksheet 10. Page 59 of 130. General Problem to address. “The other buildings will not be evaluated unless the current land use changes.” Please indicate that land use controls will be placed on the buildings not being investigated as is discussed earlier in the document.

EPA RPM Comment 5: SAP Worksheets 15. Pages 79. EPA is not in agreement that no action should be taken for J flagged results that could potentially be over the PAL unless other COC’s are over the PAL. EPA believes that this statement should be revised to read something along the lines of no action will be taken unless other COC’s are detected.

EPA Tox Comment 1: Page 62 of 130, Groundwater Samples. The sentence reads, “USEPA 2002 provided groundwater screening values for use in vapor intrusion pathway evaluation; however, the guidance indicated that the standard values may not be applicable in cases of very shallow groundwater (e.g., less than 5 feet below ground surface). Therefore, the screening levels were not acceptable for use at Site 21.” The last sentence should read, “Therefore, the screening levels were not acceptable for use at Site 21 *since shallow groundwater is less than 5 feet below ground surface.*”

EPA Tox Comment 2: Page 66 of 130. The last bullet statement is incomplete. “National indoor and outdoor air background concentrations in comparison to site-specific outdoor air data to . . .???”

EPA Tox Comment 3: Page 79 of 130, footnote 2. The footnote reads, “Due to the uncertainty of this data, no action will be taken solely on “J” flagged 1,2-DCA results that are below the laboratory QL if no other analytes have been detected above their PAL.” EPA disagrees with this decision and recommends the following; “Due to the uncertainty of this data, no action will be taken solely on “J” flagged 1,2-DCA results that are below the laboratory QL if no other analytes have been detected.”

EPA APD Comment 1:

Refer to EPA RPM comment 5 and EPA Tox comment 3. In addition, if there are two or more

chemicals whose project action limits are below their QLs and are detected below the QLs and flagged with a "J", risk should be calculated for those flagged chemicals at their estimated values and also at the values of their QLs. This way we would have a calculation of risk for the estimated measurements of those chemicals as well as the upper bound. At that point we can determine if further action is necessary.