

DEQ Review Comments

Risk Assessment

West Property – TASS 2 Site

Document dated July 12, 2024

Comments by Sarah Greenfield

1. **General.** DEQ appreciates the efforts of the City to incorporate results of the soil vapor sampling results and methane observations into this revised version of the Risk Assessment (RA). Overall, the report does a good job of summarizing these results, however the RA does not currently identify any risk scenarios associated with methane. While methane is relatively non-toxic, it can pose a flammable or explosive hazard if allowed to accumulate in poorly ventilated spaces and can act as an asphyxiant if allowed to displace oxygen in the air. As a regulated hazardous substance under DEQ cleanup rules, any potential human health pathways associated with methane should be identified (See DEQ specific comment below) and mitigated, if warranted. DEQ reserves comment on proposed methane mitigation measures pending review of the TASS 2 Remedial Action Plan.
2. **Section 3.1.5 Subsurface Methane.** Rather than referring to a “previous soil vapor investigation” DEQ recommends that this section be revised to indicate the date(s) of the investigation when methane was observed.
3. **Section 3.2.1 Human Health Receptors.** Consistent with the language in the SVI report, this section should acknowledge that indoor air is being evaluated as equivalent to exposure to outdoor air.
4. **Section 3.2.3 Methane.** This section currently does not identify any risk pathways for methane. DEQ suggest that this section indicate that the methane exposure pathway is currently incomplete since there are no structures or uses of the site and the methane is contained within subsurface soil, but there are potentially complete pathways for human health receptors within unventilated enclosed spaces.
5. **Section 3.3.3 Soil Vapor Screening Levels.** The terms LEL and UEL should be included in the upfront list of abbreviations.
6. **Section 4.13 Soil Vapor Investigation.** The SVI report should be referenced for details on the soil vapor sampling. This section should also acknowledge that methane was not detected in SV-10-TO-15, but that this could be due to the introduction of ambient air in the sample.
7. **Section 4.6.** Rather than saying that there are no construction worker RBCs established for acetone and bis(2-ethylhexyl)phthalate, it would be more correct to say that DEQ does not have established RBCs for acetone and that the construction worker and excavation worker RBC for BEHP in groundwater exceeds the solubility limit.
8. **Section 5.1.1 PAHs.** The following compounds are misspelled and should be corrected: Benz(a)anthracene and Dibenz(a,h)anthracene.
9. **Attachment D, Table 4C.** Manganese is misspelled as “Mangansese” in the column heading.