

## DEQ Review Comments

Revised Soil Vapor Investigation

West Property - TASS 2 Site

Document dated June 24 2024

Comments by Sarah Greenfield

1. **General.** Despite deviations from the work plan, DEQ agrees that the existing soil vapor sampling results are sufficient to conclude that soil vapor concentrations of VOCs do not pose a risk to site workers or future TASS 2 occupants. However, additional soil vapor sampling may be required to evaluate volatilization risks for future occupational use of the site in the forthcoming site-wide Risk Assessment.
2. **Scope of Services, seventh bullet, second sub bullet.** The Soil Vapor Investigation report (report) indicates that the TO-17 samples were collected as a secondary line of evidence to assess potentially low concentrations of naphthalene. Per DEQ's April 16, 2024 e-mail to BES, DEQ requested TO-17 analysis to support evaluation of potential sources in the southeast corner of the property where the diesel repair shop, truck wash, and former UST were located. TO-17 analysis was identified due to TPH-diesel being a primary constituent of concern that is not measured by TO-15 analysis. This section should be revised to simply state the analytical analyses that were requested. Regardless, DEQ agrees that the soil vapor results from the TO-15 analysis are sufficiently low that there does not appear to be a source of soil vapor concentrations that would pose a risk to site workers or future TASS 2 occupants.
3. **Multi-Meter Screening and VOC Sampling, third paragraph.** The summary of VOC data capture (successful collection) is somewhat misleading in that it does not acknowledge the loss of half of the requested analyses in calculating the rate of data capture. DEQ suggests that this section be revised to simply state that valid data were collected at 8 out of 10 locations. This section should also identify which locations are not considered valid and briefly why (i.e., sample not collected or sample did not meet QA/QC requirements). Discussion of QA/QC issues and their impact on the usability of the data should be discussed in the Work Plan Deviations, Chemical Analytical Results, and/or Conclusion sections.
4. **Sample Shipping – Chain of Custody.** This section only discusses the shipping and results of the TO-15 analysis. DEQ suggests that this section be revised to indicate that samples were shipped to the lab for TO-17 analysis but were lost in shipment as discussed in the Work Plan Deviations section. Therefore, the data table and summary include TO-15 results only.
5. **Additional Methane Investigation and Screening Activities.** DEQ notes that the additional methane investigation activities were performed in response to DEQ's June 5 e-mail requesting that the CMMP be revised to address observed methane, and that methane be considered in the forthcoming RAP.
6. **Work Plan Deviations, fourth bullet.** Per DEQ Comment #2, DEQ does not see TO-17 analysis as a secondary line of evidence and this statement should be removed.
7. **Risk Screening Levels, fifth paragraph.** Since the Remedial Action Plan has not yet been reviewed or approved, DEQ suggests that this section be revised to state that the mitigation

measures identified in this section are “proposed” or “likely to include...” These measures should also include routine monitoring of structures such as bathrooms and kitchens as indicated in the slides presented to DEQ on June 13, 2024.

8. **Chemical Analytical Results, first paragraph.** This section should acknowledge that the only sample where methane was not detected (TO-10-TO-15) is the sample found to have a 40 percent ambient air contribution suggestive of sample dilution.
9. **Chemical Analytical Results, second paragraph.** For clarity, the text should specify that the site-specific RBCs discussed in this section are for volatilization to outdoor air. DEQ notes that the sample results identified several compounds which exceed DEQ’s generic RBCs for volatilization to indoor air under the occupational scenario, which will need to be considered for the future site-wide risk assessment.
10. **Figure 1.** A May 2000 groundwater sample location (B-2) is depicted on the map, but not discussed in the text. This should either be removed from the figure or discussed, if relevant.
11. **Editorial Comments.**
  - a. **Scope of Services, seventh bullet, first sub bullet.** The “t” in total petroleum hydrocarbons should be capitalized.
  - b. **Multi-Meter Screening and VOC Sampling, first paragraph.** The methane concentration of “5049” should be revised to “49” percent.
  - c. **Risk Screening Levels, fifth paragraph, second sentence.** The word “air” is missing following the word “ambient.”