

Joslin, Richard R - DNR

From: Brian Kappen <Bkappen@enviroforensics.com>
Sent: Wednesday, September 20, 2017 8:12 AM
To: Joslin, Richard R - DNR
Cc: Rob Hoverman; Ziemba, Leah H (24420)
Subject: Wooden Wash Tub SIR Comments BRRTS 02-60-385641

Categories: WORK - Important

Rick,

In the September 13, 2017 letter to our client Marilyn Berlin, DNR indicated that additional investigation to assess the vapor intrusion pathway in the Site building is required. The required assessment includes a soil gas sampling port installed in the part of the basement with a dirt floor (no concrete slab).

We have not seen this assessment approach in any guidance documents or rules, and we have concerns about the technical merit of the approach:

1. If the soil gas sampling port is installed any shallower than a few feet, it would likely pull indoor air since there is nothing to seal against at the surface. The depth to groundwater measured at monitoring wells indicates that the water table is near the basement floor elevation, which may preclude soil gas sampling all together.
2. As reported in the SIR, low concentrations of PCE were present in three (3) indoor air samples collected in the basement, so we know there is some vapor movement into the basement. It is our opinion that if vapor was present in the dirt floor area of the basement at concentrations above screening levels, the vapor would be causing an action level exceedance in indoor air. There is no barrier to inhibit vapor intrusion.

We are comfortable with sub-slab vapor sampling, and we are willing to install a second SSV port in the basement slab in lieu of the soil gas sampling port.

Please reply with concurrence that sub-slab vapor and indoor air sampling are sufficient to assess the VI pathway, or with specific construction requirements for the soil gas sampling point.

Regards,

Brian Kappen, P.G.

Senior Geologist/Project Manager

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