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ST JULIENS CREEK
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VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY COMMENTS TO VAPOR
INTRUSION MONITORING SAMPLING AND ANALYSIS PLAN SITE 21 ST JULIENS CREEK
ANNEX CHESAPEAKE VA
8/11/2011
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

Jones, Adrienne/VBO

From: Doran, Karen (DEQ) [Karen.Doran@deq.virginia.gov]
Sent: Thursday, August 11, 2011 8:29 AM
To: Jones, Adrienne/VBO; Bob Stroud; Staszak, Janna/VBO; Walter Bell
Cc: Newman, Kyle (DEQ)
Subject: Site 21 VI Monitoring SAP - VDEQ comments

Team –

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

Technical comments:

1. The SAP should include an SOP for identifying potential indoor sources of contamination. The list of potential contaminants is long and varied (ranging from air fresheners to even some hand soaps), and the removal of these items is particularly critical to obtaining accurate data regarding indoor air quality. Workers using the list provided in Appendix C from the “Conducting Building Surveys for Vapor Intrusion Evaluation” (Section 6.12, page 4 of 5) may not be able to adequately identify all potential sources. Given the consequences of an inaccurate sample (additional analysis, increased uncertainty, potential remobilization, etc.), developing an SOP for identifying these potential contaminants could prevent significant project costs and delays.
2. Worksheet #11, footnote 1: Given that there is only one round of data and the variability of the low detection analytical methods used, building specific attenuation factors should be based on the most conservative measurements from each building if they are used. Therefore, attenuation factors for Building 1556 and Building 47 should be 0.03 and 0.008 respectively.

Typographical comments

3. Worksheet 9-1: The sentence below the bullets appears to be an environmental question to be answered. If so, please format as bulleted text.
4. Worksheet 9-3, last paragraph: Underline “Forward”.
5. Worksheet 14, Demobilization: The tasks listed for demobilization do not appear to be associated with demobilization. Please correct if necessary.
6. Figure 6, Box 10: Please clarify what “building contributions” is referring to in this box.
7. Attachment A: The inclusion of draft decision trees in this attachment is confusing and needs additional explanation. Perhaps inserting a page prior to the decision trees explaining that they are draft, or labeling the figures as draft would reduce confusion.

Thank you for the opportunity to comment.

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