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EMAIL AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
ON DRAFT TECHNICAL MEMORANDUM FOR SEMI-ANNUAL MONITORING VI SITE 21 ST
JULIENS CREEK ANNEX VA
9/25/2012
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

From: [Cutler, Jim \(DEQ\)](#)
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Subject: Draft Site 21 1st Semi-Annual VI Monitoring Technical Memorandum
Date: Tuesday, September 25, 2012 12:01:47 PM

My only comments relate to what I brought up at the partnering meeting. I had a hard time keeping the “events” and “rounds” straight. I am assuming although I could not find it stated in this tech memo that GW is sampled on a semi-annual basis. Vapor monitoring is then conducted after each GW sampling round. It can be confusing when semi-annual is used to describe one sampling but not the other in the same sentence (page 3). Maybe establish that the GW sampling is semi-annual and that all subsequent VI sampling (if required) follows the GW frequency. As I understand it inhalation risk sampling will be undertaken until there are three rounds of GW sampling that have met cleanup criteria.

Also, after each ERD event explosive hazard measurements are collected during the subsequent GW sampling round until measurements are below PALs for three consecutive rounds (GW sampling?). If this is the case then I don’t understand the next to last sentence on page 3. “If..... are below PALs, no additional action is required until the next semi-annual vapor intrusion monitoring event.” Isn’t this “event” the same as the “round”? I’m assuming everything happens at the same time which is semi-annually. Do you mean to say the explosive sampling resets after a new ERD event?

Also at the top of page 9 it is recommended that additional explosive measurements should be conducted. Again I’m assuming that rounds are semi-annual. In recommending an “additional” round the reader could be confused as to the round frequency and whether additional sampling is required over and above what is required.

I hope I have this right. It’s hard enough just keeping all the different “semi-annual” tech memos and versions straight.

Thanks,

Jim

P.S Kyle also looked at it and had no comments.

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