

**Staszak, Janna/VBO**

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**From:** Doran, Karen (DEQ) [Karen.Doran@deq.virginia.gov]  
**Sent:** Monday, May 03, 2010 11:10 AM  
**To:** Jones, Adrienne/VBO; Bob Stroud; Staszak, Janna/VBO; Walter Bell  
**Subject:** Site 21 RI Addendum - VDEQ RPM comments  
**Attachments:** image001.jpg

Team -

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

Technical comments

1. Table 4-5, N/A explanation - since the attenuation factor for SV01 and SV03 was not calculated, the site-wide average attenuation factor is biased low; this should be discussed in the uncertainty section
2. Section 6.1 - is there an elevator sump that may be a preferential pathway?
3. Figure 6-1 - include drains, expansion joints, sumps, and outdoor air infiltration in the CSM
4. Figure 6-2 - clarify that the fans are non-functioning, and include outdoor air infiltration in CSM
5. Section 7.2, last two paragraphs - based on the decision tree the next box is, "Establish monitoring program to confirm site conditions haven't changed to allow for vapor intrusion and re-evaluate after the remedy" followed by, "Implement land use controls to eliminate residential pathway and re-evaluate after the remedy" therefore, it is inappropriate to use the term "NFA" - please rephrase these paragraphs

Typographical comments

6. Figure 2-7 - add "limit" after "detection" in legend
7. Section 3, third paragraph, fifth line - change "or the collection" to "and the collection"
8. Section 3, third paragraph, last sentence - remove "however"
9. Section 3, fourth paragraph, first sentence - remove second "and"
10. Section 3.1.2, first line - add "locations" after "sample"
11. Section 3.1.3, last bullet, third sentence - remove "were"
12. Section 4.2, first line AND Section 4.3.1, first line - change "was compared" to "were compared"
13. Section 4.8.3 - should cis-1,2-DCE be capitalized at the beginning of a sentence?
14. Figure 4-1 AND Figure 4-2, legend - use either "location" or "locations" not both
15. Figure 4-2 - is there a D qualified result on this figure?
16. Section 6.1, first line - define acronyms "FISC" and "ILS"
17. Section 7.1, first paragraph, fourth sentence - change "he" to "The"
18. Section 7.1, second paragraph, last sentence - change "here" to "There"
19. Section 7.2, second sentence - monitoring is warranted as documented in decision tree, please change "may be" to "is"

20. Attachment G, Page 1, fourth line from bottom - positively is misspelled
21. Attachment G, Page 2, first and second lines - averaging and interpretation are misspelled
22. Attachment G, Page 2, Phase II, second paragraph - positively, averaging and interpretation are misspelled
23. Attachment G, Page 3, first full paragraph, second sentence - change "is presented" to "are presented"
24. Attachment G, Page 3, large middle paragraph, middle line - insert space between "positively" and "pressurized"
25. Attachment G, Page 3, large middle paragraph - averaging and interpretation are misspelled
26. Attachment G, Page 3, third paragraph from bottom - change "were overlain" to "was overlain"
27. Attachment G, Page 4, second full paragraph - averaging and interpretation are misspelled
28. Attachment G, Page 4, last paragraph, second sentence - change "is presented" to "are presented"
29. Attachment G, figures - depict the power outages on all figures

Please note, I will be forwarding additional risk assessor comments to the team once I receive them.

Thank you for the opportunity to comment.

***Karen M. Doran***

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