JUN 0 8 2016

Mr. Lawrence C. Rosen
Environmental Operations, Inc
1530 South Second Street, Suite 200
St. Louis, Missouri 63104-4500

RE: Comments on the Groundwater Monitoring and Vapor Intrusion Work Plan dated May 5, 2016, for the Solutia - J.F. Queeny Site, St. Louis, Missouri
EPA ID No. MOD004954111

Dear Mr. Rosen:

The U.S. Environmental Protection Agency in consultation with the Missouri Department of Natural resources is providing the following comments to be incorporated into a revised Work Plan to be submitted within 30 days from the date of this letter.

1. Section 3 should also indicate that the purpose of the revised groundwater monitoring network is to further define the lateral boundaries of the contaminant plume in the Fill/Silty Clay Unit resulting from historic releases from the former FF Building area.

2. The second paragraph of Section 5.1 should be revised to state that if the sum of the carcinogenic risks exceeds 1E-06 or if the VI hazard index exceeds 0.1, a sub-slab study will be triggered. These more conservative trigger values are supported by Section 6.4.4 of the EPA's vapor intrusion technical guide (OSWER Publication 9200.2-154) which states that modeling predicts that soil gas concentrations tend to be greater beneath a building than at the same depth in adjacent open areas of the building.

3. The third paragraph of Section 5.1 should be revised to state that if the sum of carcinogenic risks exceeds 1E-05, or if the VI hazards sum exceeds 1.0, an indoor air study will be triggered.

4. Grammatical corrections should be made to the fifth sentence of the second paragraph of Section 5.2 (will <u>be</u> placed) and the second sentence of the third paragraph of Section 5.2 (48 <u>hours</u>).

5. Section 5.4 should be revised to state that the floor of the rooms being sampled will be inspected for holes and cracks prior to installing the sample probe. Cracks and holes should be sealed prior to installing a sample probe. Otherwise, it is unlikely that sub-slab vapors would build up beneath the floor. If the building owner will not allow for floor voids to be repaired, the indoor air sampling phase should be implemented concurrently with the sub-slab sampling.

6. Section 5.4.1 should be revised to indicate that sub-slab sample points will be flush mounted.

7. Section 5.5.2 should be revised to state that two indoor air samples will be collected from each building investigated, and that 2 sampling events will be performed at each building. One of the

BT: H:\AWMD\WRAP\2016 Correspondence\Morrison\Comments on soil gas WP. 5.16.doc

| CONCURRENCES | | |
|---|---|---|
| SYMBOL | WRAP | WRAP |
| NAME | Morrison | Johnson |
| INITIALS/DATE | BM 6-3-16 | 6-3-16 |

RCRA

555331

indoor air sampling events for each building should be performed between December 15 and February 15.

Please contact me at (913) 551-7755 if you have any questions concerning these comments.

Sincerely,

Bruce A. Morrison
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR
Rich Nussbaum, MDNR
Stacy Hastie, SWH Investments
Eric Page, EOI