Message

From: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Sent: 8/15/2017 9:56:28 PM
To: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]; MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]
Subject: RE: Comments on the Area 40 SAP for Ambient Air

Hi Alex – Thanks for the comments. For comment 1, if TCE is found in ambient air beyond the boundaries of the open space at concentrations above risk thresholds, TCE reductions at the source area will definitely be needed. In order to determine the size of the excavation, we would need to know the concentration in soil vapor or groundwater that results in an unacceptable risk in ambient air at the open space boundary. What data are you anticipating that would tell us that VOCs above concentration xx in soil vapor or groundwater results in an ambient air risk beyond the boundaries of the open space?

I do not believe this investigation is going to provide that information. It will only tell us the ambient air risk to anticipated receptors and what is contributing to the risk. It will not tell us if the detection of TCE is due to TCE remaining in the soil or coming from groundwater. As such, the remedy will be the same. Excavate the source to reduce impacts to groundwater and remediate groundwater. Confirmation sampling will need to be performed following source removal to determine if it was successful in reducing ambient air and soil vapor concentrations sufficiently to allow uses other than open space. If excavation is not successful in reducing ambient air concentrations and soil vapor concentrations to allow uses other than open space, then the land use cannot be changed (as will be stated in the LUC). Groundwater remediation would have to continue and periodic monitoring of ambient air and soil vapor will have to be conducted until concentrations are reduced to levels that would allow other land uses.

Let me know your thoughts. Thanks! Chris

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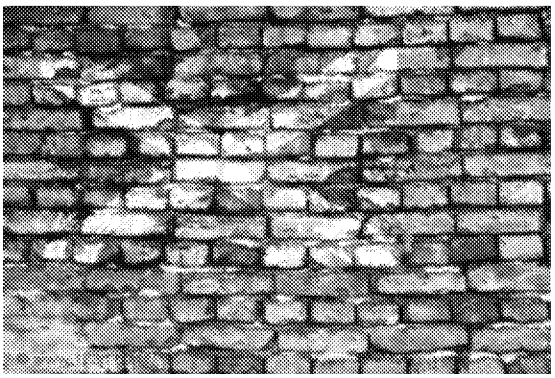
From: MacDonald, Alex@Waterboards [mailto:Alex.MacDonald@waterboards.ca.gov]
Sent: Tuesday, August 15, 2017 2:07 PM
To: Fennessy, Christopher; MacNicholl, Peter@DTSC; keller.lynn@epa.gov
Subject: [EXTERNAL] Comments on the Area 40 SAP for Ambient Air

Attached are my comments in Word and pdf. A hard copy will be coming in the mail.

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