



Fw: Picatinny - Site 78 Draft ROD

Wednesday, September 1, 2010 4:12 PM

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Ted, fyi, here is our risk assessor's take on the Arcadis tech memo for Bldg 91.

----- Forwarded by Bill Roach/R2/USEPA/US on 09/01/2010 04:08 PM -----

From: Charles Nace/R2/USEPA/US  
To: Bill Roach/R2/USEPA/US@EPA  
Date: 09/01/2010 04:04 PM  
Subject: Re: Picatinny - Site 78 Draft ROD

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Bill,

The monitoring of indoor air for total VOCs, assuming it was all vinyl chloride, and comparing the value to an OSHA value is not an acceptable method to evaluate vapor intrusion.

However, the weight-of-evidence approach provided that evaluates the distance to groundwater contamination, groundwater flow, and comparison to screening values, does provide a better picture of the potential for vapor intrusion. I would feel more comfortable with data that shows monitoring well data on the up-gradient side of Building 91. I would also like to see comparison to values from the EPA Vapor Intrusion Guidance (2002) from Table 2c. Note that some values in table 2c have defaulted to the MCL. For these chemicals, we use the values presented in Table 2a and move the decimal two places to the left to reflect a health-based value at the 10<sup>-6</sup> value.

I think we likely do not have to do a vapor intrusion study, depending of course on what the up-gradient groundwater data and comparison to EPA values shows.

Chuck



From: Bill Roach/R2/USEPA/US  
To: Charles Nace/R2/USEPA/US@EPA  
Date: 08/03/2010 11:46 AM  
Subject: Picatinny - Site 78 Draft ROD

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Chuck, fyi, Picatinny took indoor air samples in Building 91 following the public comments on the proposed plan. The results are summarized in the ROD on page 2-5. Indoor air samples were taken on April 13, 14, and 19 and total volatile organic compounds (TVOC) averaged 240 ppb. They reference a TLV-TWA established by the American Conference of Governmental Industrial Hygienists of 1,000 ppb for VC and 'field experience guidelines' of 100 to 400 ppb for TVOC for 'normal indoor air'. My question to you is are their conclusions valid? Thanks, Bill

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