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# Picatinny - Site 78 ROD - Vapor Intrusion Evaluation at Building 91

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From:

"Roach.Bill@epamail.epa.gov" <Roach.Bill@epamail.epa.gov>

[View contact details](#)

To:

"Gabel Ted Mr CIV USA IMCOM" <ted.gabel@us.army.mil>

Cc:

michaelglaab@worldnet.att.net, "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>

Ted,

The Site 78 draft ROD indicated that indoor air quality (IAQ) assessment at Building 91 resulted in an average of 240 ppb of total volatile organic compounds (TVOC) of which vinyl chloride (VC) was identified as the primary pollutant of concern. The ROD also indicated that the IAQ assessment was conducted to determine whether indoor air quality at Building 91 was impacted by the groundwater contaminated with VOCs at site 78. The section of the ROD which addresses this issue references the threshold limit value - time weighted average (TLV-TWA) for VC established by the American Conference of Industrial Hygienists (ACGIH) of 1,000 ppb. The ROD also states that the "TVOC levels in Building 91 did not exceed the field experience guidelines of 100 to 400 ppb for normal indoor air".

EPA does not recognize ACGIH standards when addressing vapor intrusion at CERCLA sites. Since Building 91 is proximate to VOC-contaminated groundwater, EPA requests that a subslab investigation be conducted to determine whether the VOCs found in Building 91 are originating from beneath the building and hence from contaminated groundwater. The Army should submit a work plan for this work to EPA and NJDEP for their review and approval. If it is determined that subslab vapors are causing the CVOC detections in Building 91 then a remedy will have to be selected and documented in the Site 78 ROD before it can finalized and signed by EPA.