Vieques
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From: Kolodziej, Edward (GE, Corporate)
Sent: Friday, May 04, 2012 4:31 PM
To: Aviles.Jesse@epamail.epa.gov
Cc: dan.burnell@tetratech.com
Subject: GE-Vieques soil gas

Jesse: Thanks for your time on the phone last week to discuss the GE-Vieques project. One of the topics of discussion was a request from Jean Robert Jean of EPA in 2006 regarding subslab sampling to evaluate vapor intrusion potential. As agreed, GE and our consultant, Tetratech, have checked our files but have not found documentation of GE and EPA's discussion of subslab sampling. The records do show that:

- Soil gas samples were collected adjacent and south of the main building in 2007.
- The results were submitted to EPA in a letter report dated June 2007, which found no unacceptable risks from soil gas.
- Further sampling of soil gas or further assessment of vapor intrusion potential was not requested.
- In a letter dated May 8, 2008, EPA requested submittal of a CMS Workplan.
- A CMS Workplan was submitted to EPA on July 14, 2008.

As indicated in the June 2007 report, separate-phase chlorinated VOC sources are unlikely to be present at the southern, upgradient portion of the Site. Soil gas is likely to emanate from the dissolved VOCs in groundwater, but concentrations in groundwater have decreased over time; therefore, concentrations in soil gas are likely to have decreased over time, as well. In the 2007 report, it was concluded that there were "no unacceptable site risks from soil gas. In addition, the workspaces within the building consist of both warehouses that are ventilated with open doors and a few offices that are subject to a positive pressure gradient that is created by air conditioning using a fresh supply of air from roof intake ducts."

It appears that further work was not performed or required by EPA because of the high air exchange rate in the production and warehouse areas, positive pressure created by air conditioning, and the low average soil gas concentrations near the building indicated in the 2007 report. Other considerations that may have factored into the matter are that subslab sampling may be inhibited by the thicker concrete floor and operations at the main building, and indoor air sampling may not be appropriate in an industrial setting, given the potential for use of cleaners and other VOC-containing materials in operations. Finally, soil gas concentrations are likely to have declined with groundwater concentrations over time.

Based on the above, no further assessment of the vapor intrusion pathway seems to be warranted.

We appreciate the opportunity to discuss the site and hope you will find the above summary to be useful. Please contact me or Dan Burnell (703-885-5438) if there are any other questions.

Regards,

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