

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

JUL 15 2011

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Numbers: 7010 2780 0001 2212 0807 &  
7010 2780 0001 2212 0791

Also Sent via Email

Mr. Mike Dolan  
Jones, Day  
77 West Wacker Drive  
Chicago, Illinois 60601-1692

Mr. John F. Brimeyer  
Senior Project Manager  
Terracon  
870 40<sup>th</sup> Avenue  
Bettendorf, Iowa 52722

RE: Comments on the July 5, 2011 Draft Vapor Intrusion Characterization Report for the  
Chamberlain Manufacturing Site, Waterloo, Iowa

Dear Mr. Dolan and Mr. Brimeyer:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document and is providing the following comments to be incorporated into a revised submittal.

1. Page 13: The units should be corrected to  $\mu\text{g}/\text{m}^3$  in Table 4-3. The PCE value for the property at 2227 E. 4<sup>th</sup> Street should be  $140 \mu\text{g}/\text{m}^3$ , unless sample ID # SSD-38 is invalidated and an explanation is provided. The health risk factors in Table 4-3 appear to be off by a factor of 10 and should be corrected. For instance;  $(41/4.1)(1 \times 10^{-6}) = 1 \times 10^{-5}$ , the value for this example is listed as  $1 \times 10^{-4}$  in the report.
2. Page 18: Sub-slab sampling ports shall not be removed at this time. The flush-mounted sampling ports do not pose an inconvenience or trip hazard to home occupants. The Interstate Technology and Regulatory Council (ITRC) Guidance states that the conceptual model for vapor intrusion should consider changes in barometric pressure, wind load, thermal currents, and pressure differential. When considering these parameters along with variability in building foundations and vadose zone characteristics, a site conceptual model that represents each residence is not realistic. Variability in these parameters not only supports the sampling of individual residences for potential vapor intrusion, but justifies several sampling events per residence at different times to account for potential seasonal and spatial variation.





3. Page 19: In addition to the area proposed for vapor intrusion sampling in the draft, residences located further southwest of the facility should be sampled. More recent groundwater contamination isopleth maps show that additional residences are located above TCE, PCE, and/or cis-1,2 DCE groundwater concentrations greater than 100 µg/l. Specifically, residences at the following locations shall be sampled for vapor intrusion in accordance with the recently updated Vapor Intrusion Characterization Work Plan.

Residences adjacent to the east and west sides of Hope Avenue between Hanover Street and East Parker Street

Residences adjacent to the north and south sides of East and West Parker Streets from Hope Avenue to Reed Street

Residences adjacent to the east and west sides of Logan Avenue from Hanover Street to East and West Parker Streets

Residences adjacent to the north side of Gable Street from Logan Avenue to Cutler Street


Residences adjacent to the east and west sides of Reed Street from West Arlington to West Parker

Residences adjacent to the east and west sides of Cutler Street from Hanover Street to Gable Street

Residences adjacent to the north and south sides of West Arlington Street from Reed Street to Hope Avenue

4. Paragraph 76 of the Unilateral Order (Docket No. RCRA-07-2010-002 and CERCLA -07-2010-0005) provides the EPA shall be notified not less than 30 days in advance of any sample collection activity. This shall include notifying the EPA project manager on dates, times, and locations of all future sampling to be performed so that EPA can elect to collect split samples and oversee the sample collection at future sampling events at the Chamberlain site.
5. Appendix B, Table 1: This Table should be corrected to accurately designate all duplicate samples.
6. Documents containing data and personal information such as names and addresses that are transmitted to IDNR can become available to the public due to document release policy at IDNR. The EPA considers the names, addresses, and phone numbers of residences where samples are collected to be private and therefore, should not be made available to the general public. In order to prevent the release of this private information, documents mailed to IDNR need to be redacted for names and addresses of residences that are sampled. The EPA is requesting that you redact the names and addresses from all future documents being sent to IDNR. If you decide not to redact this information from documents being sent to IDNR, the EPA requests that you refrain from sending to IDNR any site related documents containing the names and addresses associated with residential sampling.

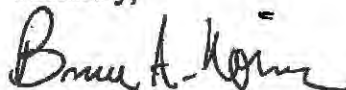
The EPA continues to be concerned about the potential for vapor intrusion exposure to residents at the properties identified for sampling in Appendix B of the Vapor Intrusion Work Plan where access was not obtained and homes were not sampled. Another attempt should be made to obtain access at those properties. Residences where a response to an access request was not received from an owner or occupant should be contacted again for access. However, where either an owner or occupant has responded with a denial for access, additional attempts at gaining access need not be performed.



[REDACTED]

If you have any questions concerning these changes and clarifications, I can be reached by phone at (913) 551-7755.

Sincerely,



Bruce A. Morrison  
Project Manager  
Waste Management Division

Redacted cc: Dan Cook, IDNR  
Deborah Tinker, IDNR