

From: Mark Kram
To: [Comments.SABReport](#)
Subject: [External] Comments on Draft TCE Indoor Action Level Report; NC DEQ Secretaries' Science Advisory Board
Date: Wednesday, November 7, 2018 2:36:56 PM

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Greetings,

My comments are as follows:

1) [Appendix B](#), Supplemental Guidance, Sampling Considerations states: "*DWM recommends time-integrated air sampling methods to account for temporal variability in vapor intrusion. Time-integrated samples provide a direct measurement of the average TCE concentration over a fixed period of time (e.g., 8 hours, 24 hours, 3 days, 7 days, etc.), which should be compared to the DWM action levels in Table 1. TCE concentrations are to be quantified using USEPA-approved volatile organic laboratory analytical methods. The time-integrated sampling periods should be chosen to enable identification of peak exposures that may exceed the applicable action level.*"

In addition to time-integrated sampling methods, DWM should allow for automated continuous monitoring of VOCs (TCE, PCE, VC etc.). These systems enable the recognition of temporal patterns and exact durations of exposures above allowed levels, which time-integrated methods do not. In addition, the systems collect climatic parameters such as barometric pressure and cross-foundation differential pressure, enabling cause-and-effect of VOC concentrations to be evaluated. This approach also allows for indoor VOC sources and VOC entry points to be rapidly identified. Furthermore, when acute TCE risks are exceeded, automated responses can be engaged to prevent exposures beyond a duration of concern. Costs are comparable to time-integrated sampling methods.

These newer approaches have been successfully used at EPA, DoD and private sector sites.

More information can be obtained via the following links:

<http://www.groundswelltech.com/VaporSafe.aspx>;

<http://www.groundswelltech.com/VaporSafeProjects.aspx>;

<http://groundswelltech.com/VaporIntrusionMatrix.aspx>

2) [Appendix C](#), Slide 14, Indoor Air Monitoring: Adding a set of slides describing the automated continuous monitoring system would enable practitioners to be aware of this technology. Slides could be added to the existing slide deck or described in a separate appendix.

If there are questions about my comments above, I would be happy to set up a call to discuss

and to provide additional information.

Thank you for your consideration.

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From: Risotto, Steve
To: [Comments.SABReport](#)
Cc: [Bateson, James](#)
Subject: [External] comments on TCE guidance
Date: Tuesday, November 13, 2018 10:58:51 AM

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The American Chemistry Council requests that the deadline for public comments on the Department's TCE indoor air action level report be extended for 30 days to allow more time to develop comprehensive comments.

Thank you - we appreciate your prompt response to our request.

Steve

Stephen P. Risotto

srisotto@americanchemistry.com

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(571) 255-0381 (mobile)

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From: Risotto, Steve
To: [Mort, Sandra L](#)
Cc: [Bateson, James](#)
Subject: RE: [External] comments on TCE guidance
Date: Friday, November 16, 2018 10:16:04 AM
Attachments: [image001.png](#)

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Dr. Mort -

Apologies for the multiple contacts, but I neglected to mention in my voice mail that ACC and the Halogenated Solvents Industry Alliance sponsored a fetal cardiac defect study in drinking water that was recently completed. The results of the study have been submitted to EPA just this week and should be of interest to DEQ and the SAB.

I am hopeful that we can get a little more time to place these new results in the context of the DEQ TCE policy.

Thanks,

Steve

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From: Bateson, James [mailto:james.bateson@ncdenr.gov]
Sent: Wednesday, November 14, 2018 3:28 PM
To: Risotto, Steve
Cc: Mort, Sandra L
Subject: RE: [External] comments on TCE guidance

Steve,

Sandy Mort, senior DEQ toxicologist, and our Department's liaison with the SAB, will field your request.

Thanks,

Jim Bateson
Section Chief
Division of Waste Management, Superfund Section
North Carolina Department of Environmental Quality

Mort, Sandra L

From: Genna Olson <golson@harthickman.com>
Sent: Wednesday, November 21, 2018 6:47 PM
To: Comments.SABReport
Subject: [External] TCE Report

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This email provides comments on the TCE report currently under public comment. The draft guidance within the report seems to place a portion of the burden of reporting and taking “immediate action” in the case of indoor air exceedances on the environmental consultant. However, this represents significant challenges in cases where our client has not authorized us to report or approved costs for “immediate actions”. We request that the language be modified to reflect “Required Action by the State-Lead Contractor or Remediation Party”. Obviously, many clients will request that we take these actions on their behalf. However, it is unreasonable to place the responsibility on consultants since consultants are in no way responsible for the releases under investigation. Please feel free to contact me if you have any questions.

Thank you.



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