

MS, T TA-21

Van Horn, Kristen, NMENV

From: Van Horn, Kristen, NMENV
Sent: Monday, April 13, 2009 10:35 AM
To: 'brucew@lanl.gov'
Cc: Roberts, Kathryn, NMENV; Cobrain, Dave, NMENV
Subject: MDA T vapor intrusion

Bruce,

I received your voicemail message from Friday (April 10, 2009) regarding the vapor intrusion assessment I brought up in the email also from April 10th. LANL's assessment of the potential for indoor industrial worker exposure to soil vapors as part of the *Response to the Approval with Modifications, Phase II Investigation Report, Material Disposal Area (MDA) T at Technical Area (TA) 21, Revision 1.0* (March 2008) cannot be accepted as the vapor intrusion assessment, because NMED required the assessment be submitted as a separate document (Comment 8 in the *Approval with Modifications*).

Additionally, the vapor intrusion assessment in LANL's response includes the wrong values from the EPA's screening levels for industrial workers (inhalation). Just a note, the web address referencing the EPA's HHMSSLs is no longer valid. From the values included in the table as the "Maximum Concentration Detected", it is not clear which values the mg/kg were calculated from (e.g., acetone has a value of 0.159 mg/kg in the table, the maximum detected value at MDA T for acetone was 560ug/m³ (21-603059, 229.5-234.5' in Phase II Investigation), converting to mg/kg the acetone value is 0.24 mg/kg).

Please correct the problems in LANL's response to Comment 8 of the *Approval with Modifications* mentioned above and provide more detail about the assessment, then submit the separate document required by the *Approval with Modifications*. So that you will be in compliance with the *Approval with Modifications* (and consequently the March 1, 2005 *Order on Consent*).

If you have any questions or concerns regarding the vapor intrusion assessment, please feel free to contact me.

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