

**Responses to Comments from
U.S. Environmental Protection Agency (EPA) Region 4 on:
Vapor Intrusion Scoping Meeting (2-12-20) Summary
Former Defense Depot Memphis, Tennessee
Comments Received: 24 April 2020**

EPA COMMENTS:

1. The groundwater plumes and their associated plume boundaries that reach beyond the DDMT property boundaries (N and SW) and potentially into the surrounding neighborhoods should have plume boundaries delineated by VISL-R (residential) instead of VISL-C (commercial) with a 100 foot boundary to ensure plume boundaries that for a residential scenario.

Response 1: Agree. As stated on page 3 of 8, "In addition, the plume extent and 100-ft buffer based on VISL concentrations for residential exposure (VISL-R) will be added to the CSM for the off-site areas and the former housing area in the southeastern MI."

2. Page 4 of 8, last paragraph: mentions guidance, EPA assumes this is a reference to EPA VI guidance? EPA's OSWER Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air (OSWER Publication 9200.2-154, June 2015).

Response 2: Correct. A citation of the June 2015 OSWER Technical Guide listed above will be added to the summary. The reference to EPA guidance is in the last paragraph on page 3 of 8.

3. Page of 5 of 8, Potentially exposed population: more detailed interior building plans may be needed, dependent upon the initial VI investigative results that indicate a need to sample indoor air. This observation is provided as a possibility to be considered, if necessary.

Response 3: Agree. The presence of sensitive populations will be reviewed in the initial building assessment and the need for more detailed building plans will be considered during preparation of indoor air sampling plans.

4. The future sampling plan should include contingency actions and trigger levels for any identified acute exposure to occupants and EPA expects this to be captured in the CSP.
 - a. Explain how a rapid (time critical response action) be utilized, if deemed necessary for an acute exposure scenario, inclusive of real time discussions with regulators and decision process.

Response 4: The comprehensive sampling plan (CSP) will include discussion of response actions and trigger levels with real-time notification and discussion with regulators during the decision process.

5. Page 6 of 8, Use of PID or HAPSITE to screen buildings for VOCs before indoor air sampling.
 - a. EPA prefers the use of HAPSITE (GC), if used as screening tool.

Response 5a: A HAPSITE (GC) will be used to screen buildings.

- b. Multiple lines of evidence should be utilized to decide if indoor air samples are necessary instead of the use of one screening tool (PID or HAPSITE) before ruling out the necessity of indoor air sampling.

Response 5b: The purpose of the pre-IA screening is not to eliminate buildings from IA sampling, but to identify and remove potential contaminant sources within the building and to identify potential VI pathways. If identified contaminant sources cannot be removed or other issues are identified, multiple lines of evidence will be utilized to decide if indoor air samples are still necessary and discussed with EPA and TDEC.

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6. Page 6 of 8: Identified Data Gaps: Prioritization is discussed within the Identified Data Gap Section, however, the basis and rationale for prioritization is not discussed. EPA doesn't require this level of detail for this summary but expects to see this detail included in the comprehensive sampling plan (CSP).

Response 6: The rationale for prioritizing areas for investigation will be presented in the CSP.

7. Page 6 of 8, last paragraph, 2nd to last sentence: "IA samples will not be delayed until soil vapor sampling is completed." Please provide additional information for the sake of clarity or reword this sentence to ensure clarity and understanding.

Response 7: Previous sampling plans prioritized completion of soil gas sampling before IA sampling. The referenced sentence was added to note that was not a requirement for the comprehensive sampling plan. The sentence is not necessary and will be deleted

8. Sub-Slab Vapor Samples, Page 5:

Page 7 of 8, first sentence: mentions semi-permanent VMPs.....please include sufficient level of detail in the CSP to clarify a time period and sampling scenario associated with semi-permanent VMPs. This level of detail isn't required for this summary but is expected in the CSP.

Response 8: The rationale for sampling frequency and the time period over which samples will be collected will be included in the CSP.