



February 2, 2015

Gerard Martin
MassDEP, Bureau of Waste Site Cleanup
One Winter Street
Boston, MA 02108

Subject:

LSPA Comments on Public Review Draft, Vapor Intrusion Guidance, Policy #WSC-14-435

Dear Mr. Martin:

The LSP Association (LSPA), a professional non-profit association of nearly 900 LSPs and other environmental professionals, appreciates the opportunity to provide comments on the above-referenced draft guidance document. As is typical, the LSPA formed a workgroup to consider the draft guidance, and solicited and vetted comments and suggestions from LSPA members. There was consensus in the workgroup that areas of the guidance need clarification and further consideration.

This cover letter summarizes the overall LSPA concerns and comments on the draft guidance. The attached matrix identifies areas in the draft guidance which, in our opinion, need additional clarification, have areas of inconsistency, or need specific language changes.

Provided below are the LSPA's general comments on the draft guidance.

- We agree with the Massachusetts Department of Environmental Protection (MassDEP) recommendation for an Option in the development of Exposure Point Concentrations (EPCs) at existing buildings that addresses the potential for increased exposure in the building. At the current time, Option 2 appears to be the most health protective yet flexible enough to not impede regulatory closure. Option 3 may result in an underestimation of future exposures given a change in conditions even at petroleum sites. We look forward to working with MassDEP to develop these options further.

- We support the Department's consideration of the Inclusion Distance Approach for screening out Vapor Intrusion (VI) concerns at petroleum sites and concur that these constituents are normally readily degraded in the vadose zone. We encourage the Department to adopt this approach as an alternative to the more typical VI assessment, and recommend that MassDEP more clearly identify the conditions under which this approach may not be appropriate.
- Section 2 of the draft guidance makes several recommendations that are either at odds with the Massachusetts Contingency Plan or MCP (i.e., comparison of "deeper" groundwater to Method 1 GW-2 standards, which by definition is not applicable) or overly conservative or prescriptive (recommending grid sampling for soil beneath a building, or recommending multiple years of groundwater sampling to address seasonal fluctuation). All VI sites are different, and while additional measures may sometimes be warranted, the guidance should be careful about making sweeping recommendations.
- The draft guidance is overly prescriptive, at times, with regard to recommending default exposure assumptions for vapor intrusion risk assessments, particularly for current buildings. Considering current building use is a critical component of an effective exposure assessment and relying on default exposure assumptions that ignore the current exposure potential results in an unrepresentative risk characterization.
- More work is needed in the area of post-closure property redevelopment and regulatory triggers. For example, there is inconsistency between the MCP, recent MCP Q&A, and MassDEP feedback at the December 11, 2014 meeting in regard to reporting requirements after a building is constructed and occupied at a site that has achieved regulatory closure.
- We encourage MassDEP to maintain throughout the guidance a preference for the multiple lines of evidence approach for all VI scenarios. The LSP should have the discretion, based on the Site Conceptual Model (CSM), site specific conditions, and source control measures to weigh each line appropriately in rendering his or her opinion.



We look forward to continuing to work with MassDEP on further clarifying and refining this draft guidance. Thank you again for the opportunity to provide comments.

Sincerely,

LSP Association, Inc.

A handwritten signature in blue ink that reads 'Paul McKinlay'.

Paul McKinlay, LSP
President

A handwritten signature in black ink that reads 'Wendy Rundle'.

Wendy Rundle
Executive Director

Attachment:

LSPA Comments: MassDEP 2014 Public Review Draft, Vapor Intrusion Guidance