Response to Comment Table
Revised Work Plan for Additional Vapor Intrusion/Indoor Air Investigation
November 7, 2017

Comments per email from Jeremy Hughes of Ecology to Paul McCullough of Arca**dis** dated October 27, 2017, regarding Work Plan for Additional Vapor Intrusion/Indoor Air Investigation, Former Phoenix Inn Site, 415 Capitol Way North, Olympia, Washington, dated October 20, 2017.

No.	Ecology Comment	Response to Comment
	Other COCs	
1	Section 2.1; Regarding the detections of EDB in Room 146, the Work Plan opines that this constituent should NOT be considered a COC based on the lack of detections thereof in groundwater. An evaluation of historical soil data for EDB should also be provided.	The third bullet item in Section 2.1 was revised as follows: "Ethylene dibromide (EDB) was detected above the method detection limit in one sample (room 146), and below the laboratory reporting limit of 0.054 µg/m^3. EDB was not detected in any of the other air samples and has not historically been detected in groundwater at the Site. Additionally, EDB was not detected in any of the soil samples collected at the site during the three monitoring well installations in August 2017. No other EDB soil analytical data is available. The laboratory report for the soil samples collected in August 2017 is included in **Appendix B**. Therefore, no future testing for EDB is proposed as part of this investigation". A new Appendix B was added to the report and subsequent appendices were renumbered as appropriate.
2	Section 2.1; Additional appropriately-detailed language regarding indoor-air methane concentrations (e.g. beyond "very low") should be provided.	The fourth bullet item in Section 2.1 was revised as follows: "Methane concentrations in all indoor air samples were several orders of magnitude below the lower explosive limit (LEL) of 5-percent. The maximum concentration of methane detected in indoor air was 0.00036 percent, which is similar to background concentrations of methane in ambient outside air in the parking lot (0.00035 percent).

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No.	**Proposed Further Actions**	**Response to Comment**
3	Building survey should include language regarding use of ppb-level PID to survey rooms and facilities, particularly those areas most likely to store or otherwise contain chemicals/solvent (i.e. housekeeping, laundry facilities, pool, and any other chemical or cleaning supply storage areas).	The following sentence was added to Section 3.1: "The building survey will include the use of a calibrated parts-per billion (ppb) range photo-ionization detector (PID) to identify background sources and preferential pathways that may be present and could contribute to indoor air concentrations.
4	Work plan should clarify that indoor air samples will be collected prior to performing slab-penetrations in advance of sub-slab sample collection activities.	The following sentence was added to the beginning of Section 3.6: "Indoor air sampling will be completed prior to sub-slab probe installation and sampling".
5	Regarding the proposal to "review and tabulate available groundwater monitoring data for naphthalene", a similar review should be performed on any available, historical soil data for this constituent.	The third bullet in Section 3 has been revised as follows: "Review and tabulate available groundwater and soil analytical data for naphthalene (including soil analytical data from the three wells installed in August 2017 and the most recent groundwater sampling event conducted at the end of September 2017) and compare these data to Ecology SLs. Ecology does not currently provide soil screening levels that are protective of the vapor intrusion pathway and current regulatory guidance does not recommend modeling based on soil concentrations due to high variability".
6	Section 3.1; See comment above RE: use of ppb-level PID.	See response to Comment #3 above.

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7	Section 3.6; Indoor-air sampling at new locations (e.g. Room 148) would be better suited at locations more likely to contain potential chemical sources (e.g. housekeeping/laundering areas). Regarding sampling within Room 148, indoor air samples have already been obtained from nearby Room 146, however, no such sampling has been performed within the housekeeping/laundering area. Air samples should be collected from areas where 1) a likely source is present and 2) employees spent a large majority of time. Employee traffic and/or activity alone are insufficient rationale for not collecting samples in this location. The Work Plan should be revised to account for these changes in sampling locations (i.e. removal of Room 148 and addition of housekeeping/laundering areas).	Section 3.6 was revised to replace the indoor air and sub-slab sampling in Room 148 with a new sample location within the laundry room. • Room 132 (Previous Location) • Room 142 (Previous Location) • Room 146 (Previous Location) • Laundry Room (New Location) • Room 107 (New Location) • Lobby/Office (New Location) • Capitol Room • Fitness Room (New Location) • Ambient Air 1 – Parking lot (Previous Location) • Ambient Air 2 – Air Intake on Roof (new location)
8	Not applicable	To provide additional clarification on sub-slab vapor sample collection, Section 3.7.1 was modified to indicate that "Arcadis will collect sub-slab soil vapor samples using sorbent tubes connected to syringes set to draw a known volume of soil vapor through the sorbent tube in accordance with the method-specific instructions for EPA Method TO-17 found in Air Toxics Sorbent and Solution Sampling Guide, included as **Appendix E."**