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REVISED DRAFT REPORT

Vapor Investigation Report

Groundwater and Sediment Remediation

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1.0

INTRODUCTION

Conestoga-Rovers & Associates (CRA) has prepared this Vapor Investigation (VI) Report on behalf of Occidental Chemical Corporation (OCC) to summarize three rounds of vapor sampling activities performed in April 2013, June/July 2013, and March 2014, to assess vapor concentrations at nine buildings at and in the vicinity of the OCC Site at 605 Alexander Avenue in Tacoma, Washington. OCC is working with the Washington State Department of Ecology (Ecology) and the United States Environmental Protection Agency (USEPA) to address environmental issues at the OCC Alexander Avenue Site and adjacent properties (Site) under an Administrative Order on Consent (AOC) [USEPA Docket No. 10 07 0011 CERCLA]. The purpose of the investigation was to conduct a Tier II Assessment of the vapor intrusion pathway, as described in the Washington State Department of Ecology's (Ecology's) Review Draft *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action* (Draft VI Guidance) (Ecology, 2009), and in accordance with the USEPA's interim final Vapor Intrusion Framework (USEPA, 2009). The Tier II Assessment involves characterizing vadose zone soil vapor and indoor air quality, and determining whether volatile organic compounds (VOCs) attributable to the Site are present in soil vapor below the buildings above screening criteria, and ultimately and more importantly, in indoor air at sufficient concentrations attributable to sub-slab concentrations to potentially pose a risk to occupants.

An investigation was performed per:

1. the February 14, 2013 VI Work Plan that was approved by the USEPA on February 22, 2013
2. the March 14, 2013 CRA technical memorandum which detailed a reduction in the duration of sub-slab (SS) vapor sample collection from 24 hours to 2 hours, which was approved
3. the June 11, 2013 conference call to determine the scope of VI round two sampling, which was approved
4. the March 12, 2014 Final VI Work Plan Addendum that included details of the round three sampling event, which was approved

Figure 1 identifies the buildings investigated, including the Army Reserve Facility (ARF), Buildings 326, 407, 532, 592, 595, and 596, and the Guard Shack located on properties owned and/or controlled by the Port of Tacoma (POT), and the OCC Office Building.

Background

The February 2013 Work Plan proposed the installation and sampling of 19 SS soil vapor probes (of which 18 were installed and 17 sampled) and the concurrent collection of indoor air (IA) and outdoor (OA) samples.

On March 6, 2013, representatives of the POT and CRA met with representatives of Trident Seafoods (Trident), Totem Ocean Trailer Express (TOTE), SafeBoats International (SafeBoats), Washington Industrial Coatings (WIC), and Nano Silicates to inform the tenants of the sampling needs, what they would entail, where the sampling would occur, and when the results would be made available. On March 18, 2013, a building walkthrough was conducted with affected tenants, during which the sampling locations and work schedules were discussed with tenants to identify potential conflicts. At the time of this meeting, access to the ARF had yet to be established and the ARF was therefore not included in the initial building walkthrough. A meeting was subsequently scheduled for April 8, 2013 with an ARF representative and CRA personnel to discuss the sampling activities and select suitable sampling locations. Following the April 8, 2013 meeting, access to the ARF was granted and sampling locations were selected.

Sampling at the nine buildings was conducted over a period of April 17 through April 26, 2013, hereafter referred to as round one. A draft VI report was submitted on June 4, 2013. USEPA comments regarding the round one results were discussed on a June 11, 2013 teleconference between Glenn Springs Holdings (GSH), USEPA, and the POT. The discussions lead to agreement by GSH and approval by USEPA for GSH to conduct additional SS, IA, and OA sampling at specifically identified buildings, including POT Buildings 326, 532, 592, 595, and 596 at similar locations. At the request of the USEPA, 7-day passive sampling equipment, to better account for potential variability of conditions over time, was deployed in lieu of Summa canisters for IA and OA sample collection. Additionally, centrally located IA samples were added consistent with Draft EPA guidance, and agreements arrived at during discussions between USEPA, GSH, and POT on a June 11, 2013 teleconference, to represent potential worst-case (upper bound) vapor intrusion points.

As noted above, a second round of sampling at five buildings (Buildings 326, 532, 592, 595, and 596) was authorized, hereafter referred to as round two. Prior to the round two sampling event, a detailed survey with the involvement of tenants was completed for Buildings 326, 532, 592, 595, and 596. This second building survey was conducted to determine the potential presence of indoor sources that may contribute to indoor air quality. The survey included a request from each of the tenants to complete a questionnaire and provide Material Safety Data Sheets (MSDSs) for all chemicals used or

stored within the selected buildings. Copies of submitted questionnaires and MSDSs are included in Appendix A. The round two sampling was performed over the period of June 24 through July 9, 2013. A revised draft VI report and responses to comments were submitted on August 30, 2013, which incorporated the round two results and responses to USEPA comments issued on July 19, 2013 regarding the June 4, 2013 draft VI report (round one).

Comments on the August 30, 2013 revised draft VI report were issued by USEPA on November 22, 2013. A second revised draft VI report was submitted on December 17, 2013, which incorporated responses to USEPA comments issued on November 22, 2013. Additionally, a VI Work Plan Draft addendum was included with the responses to comments. The VI Work Plan Draft addendum included a plan to conduct a third round of sampling at five buildings including ARF and POT Buildings 407, 592, 595, and 596, hereafter referred to as round three. The purposed of round three was to conduct sampling during the heating season (cold weather) to account for potential temporally variation of sub-slab vapor concentrations. The addendum included collecting samples using Summa canisters for all SS, IA, and OA locations.

Comments on the December 17, 2013 second revised draft VI report and VI Work Plan Draft addendum were issued by USEPA on January 23, 2014. Responses to the January 23, 2014 comments were submitted to USEPA on February 6, 2014. Sketches of proposed round three VI sample locations were submitted to USEPA on February 12, 2014 following building surveys, and a conference call was conducted on February 14, 2014 to discuss the proposed sampling locations. General agreement of the proposed sampling locations with some modifications was achieved during the conference call. Revised sketches of proposed round three VI sample locations were submitted to USEPA on February 24, 2014 in response to the discussion during the conference call and additional building surveys.

Comments on the February 24, 2014 submittal were issued by USEPA on March 3, 2014 that indicated general agreement with the revised sketches pending final building surveys to be conducted prior to sampling. The comments also requested submission of a revised VI Work Plan Draft addendum. As requested by USEPA, a response to the March 3, 2014 Comment 1 was submitted to USEPA on March 4, 2014, which included revised sketches of sampling locations and rationales for the sampling locations. Responses to USEPA March 3, 2014 comments that included a revised VI Work Plan Draft Addendum were submitted to USEPA on March 5, 2014. At the request of USEPA, 7-day passive badge samplers were included in the addendum, coupled with Summa canisters, at designated IA sampling locations (one per building) and OA sampling locations.

USEPA conditionally approved the revised VI Work Plan Draft Addendum on March 6, 2014, with stipulations that information provided by USEPA regarding the 7-day passive badge samplers be incorporated in the VI Work Plan Addendum and QAPP, and that draft final versions of the marked up Summa canister sample locations figures (sketches) be submitted to USEPA on March 10, 2014, prior to round three sampling. On March 10, 2014, representatives for USEPA accompanied CRA in walk-throughs of all five buildings included in the round three sampling and requested moving an IA sample location in POT Building 592. Revised sketches, reflecting the multiple building surveys and walk-throughs, were submitted to USEPA on March 10, 2014 as stipulated. Representatives for USEPA accompanied CRA again on March 11, 2014. In lieu of moving an IA sample as requested by USEPA, GSH added an additional IA sample at the USEPA proposed location for POT Building 592. A revised sketch for POT Building 592 was submitted to USEPA on March 11, 2014 reflecting this additional change.

The revised sketches included the sampling locations from rounds one and two, and the addition of 7 SS probe sample locations and 12 IA sample locations for round three. The above information and information provided by USEPA regarding the 7-day passive badge samplers was incorporated into the Final VI Work Plan Addendum and QAPP as stipulated, all of which was submitted to USEPA on March 12, 2014. One additional change to the Work Plan was approved by USEPA on March 17, 2014. The change included permitting sampling within 24-hours of a rain event greater than 0.5 inches because of extensive pavement cover that allows little or no infiltration at the site. The round three sampling began on March 11, 2014 and concluded on March 21, 2014.

Rounds One, Two, and Three Sampling

Summa canister samples were analyzed using EPA Method TO-15 and TO-15 SIM per the Work Plan. The analytes included 24 parameters, 19 of which are Site-related chemicals of concern (COCs), and five additional compounds found in previous IA samples and in either soil or groundwater samples. The 7-day passive sampling was conducted using Radiello tubes and these samples were analyzed using EPA Method TO-17. The Radiello tubes were selected to provide greatest number of target analytes with particular interest in the analysis of trichloroethene (TCE).

Washington State Ecology recommends in its 2009 VI Guidance document that decisions regarding the number of sampling rounds necessary to determine the VI contributions from the sub-surface should be site and building dependent.

"In deciding how many events are merited, investigators will need to consider: a) the degree of soil gas contamination (higher concentrations suggesting the need for more than one event); b) the indoor air results (concentrations approaching acceptable levels suggesting the need for more than one event); and, c) the building and meteorological conditions encountered at the time of sampling (sampling during a season other than the "heating season," for example, usually suggests the need for at least an additional event during a colder period)." (Page 3-22, Ecology, 2009).

The round one and round two sampling events were conducted approximately 2 months apart (April and June/July of 2013) to capture potential variability of sub-slab, indoor and outdoor air VOC concentrations over time. The month of April is a colder period than June/July; however, the USEPA team requested an additional sampling event be completed during the heating season (cold weather) so a third round of sampling was completed in early March 2014. The round one sampling event included the use of Summa canisters. Summa canisters were used to collect 2-hour SS samples, and 24-hour IA and OA samples. The round two event included the use of multiple sample collection methods. Both Summa canisters and passive sampling using Radiello tubes were deployed. Summa canisters were used to collect 2-hour SS samples consistent with round one. IA and OA samples were collected with the passive samplers deployed over a longer period (7 days), at the request of USEPA. The different collection method was implemented to capture potential variability of VOC concentrations over a longer sample collection time (i.e., 7 days compared to 24 hours) and for comparison of the analytical results from the round one Summa canister collection method. The round three event included Summa canisters at all locations and Radiello tubes (passive sampling) at one IA and one OA location at each building at the request of USEPA. The IA passive sampling locations were selected by USEPA. Summa canisters were used to collect 2-hour SS samples, and 24-hour IA and OA samples consistent with round one sampling. Passive samplers were deployed consistent with round two sampling.

The building-specific conditions (e.g., HVAC operations, window and door openings, etc.) were similar during the sampling rounds in that they represented typical operating conditions within the buildings. One significant difference was the efforts made to remove or identify potential indoor sources for rounds two and three that could potentially contribute to indoor air quality unrelated to soil gas.

Review and analysis of the analytical results for round two did not alter the initial conclusions developed from review of the round one results, which include additional monitoring and mitigation in specific buildings by GSH, and no further action performed by GSH in others.

Review and analysis of analytical results for the five buildings included in round three altered the initial conclusions developed from review of the round one results. These include; no further action by GSH for POT Buildings 407 and 592 instead of monitoring by GSH, and additional limited monitoring by GSH for POT Building 592 instead of no further action by GSH. The conclusion of no further action by GSH for the ARF and POT Building 596 are consistent with the round one conclusions. The round one conclusions for the other buildings include; mitigation by GSH for POT Buildings 326 and 532, and OCC Office; and no further action by GSH at Guard Shack.

This Report is organized as follows:

- Section 1.0 - Introduction
- Section 2.0 - Conceptual Site Model
- Section 3.0 - Buildings Investigated and Results
- Section 4.0 - Summary of Conclusions and Recommendations
- Section 5.0 - References

2.0 CONCEPTUAL SITE MODEL

The purpose of the conceptual site model is to provide a conceptual understanding of the potential for indoor exposures to contaminants based on the sources of contamination, the transport media, and potential intrusion routes. Section 2.1 presents the Site characteristics and contaminants. Section 2.2 presents significant factors that can influence vapor intrusion.

2.1 SITE CHARACTERISTICS AND CONTAMINANTS

The Site is located on a peninsula surrounded on three sides by saltwater bodies. Groundwater flow is influenced by heterogeneous geology, salt water presence from the surface water bodies, tidal fluctuations in the surface water bodies, and past releases at the Site of high density fluids.

In general, the Site stratigraphy consists of (from ground surface downward):

- A variable thickness layer of fill mainly consisting of silty sand deposits derived from sediments dredged to create the waterways in the Tacoma Tideflats and placed to create the peninsulas located between the waterways
- Puyallup River deltaic deposits that contain a heterogeneous mixture of sands, silts, and clays
- Predominantly low permeability glacial material underlying the deltaic deposits. Some discontinuous portions of the glacial material contain more permeable outwash deposits

Variable groundwater flow direction below the Site is generally towards the waterways. Groundwater at and in the vicinity of the Site averages approximately 12 feet below ground surface (ft bgs).

Site COCs in relation to the vapor intrusion pathway are VOCs including primarily tetrachloroethene (PCE), TCE, cis-1,2-dichloroethene (cis-1,2-DCE), and vinyl chloride (VC) in groundwater that are related to OCC solvent plant operations conducted between 1947 and 1973. As these VOCs migrate in shallow groundwater toward and potentially beneath buildings, they can subsequently partition from the groundwater to soil vapor in the vadose zone and present a source for vapor contamination into overlying buildings. The presence of higher permeability soils such as sand and gravel, either naturally occurring or as utility bedding material, can act as preferential pathways

for soil vapor migration. The approximate extent of the total chlorinated VOC (TCVOC) groundwater plume in relation to the buildings is presented on Figure 1.

Concentrations of VOCs in the vadose zone soils can also partition to soil vapor and potentially migrate laterally underneath nearby buildings, presenting another potential source for vapor contamination into buildings. Figures illustrating in cross-section, the concentrations of the most recent, shallowest, and nearby groundwater and soil samples to each of the buildings investigated, where data are available, are presented in Appendix B. Air data from the three rounds of sampling are also illustrated on the figures referenced in Section 3.0. These data are discussed in Section 3.0 and are presented in tables referenced in Section 3.0.

2.2 FACTORS THAT CAN INFLUENCE VAPOR INTRUSION

There are a number of factors that influence intrusion and retention of SS vapors into a building. The presence of a building floor slab, forced air heating systems, and over insulated and waterproofed buildings are three such factors, among others, that may influence vapor intrusion and are further discussed below.

Primary among them are a building floor slab that can act as either a barrier to or a pathway for vapor intrusion. A slab that is in poor condition, is constructed of permeable material, has cracks, unsealed penetrations, and un-caulked floor/wall or expansion joints will permit more vapor intrusion. An effectively sealed or well constructed slab in good condition will better inhibit upward flow of SS vapors. The presence of a barrier such as a vapor barrier beneath the slab, or in the form of a coating applied to the surface of the floor slab, will also inhibit vapor migration to some degree, which will in turn slow VOC migration into the building. Vapor barriers or coatings enhance the ability of the floor slab to inhibit vapor intrusion. Vapor barriers are designed to inhibit moisture (water vapor) from entering buildings and may also inhibit some vapor intrusion, whereas vapor intrusion barriers (e.g., coatings) are specifically designed to inhibit vapor intrusion of volatile chemicals from the subsurface. Paved areas around buildings may also inhibit vapors from migrating to ambient air.

Another causative factor is a forced air heating system that draws cold air from within a building to be heated and returned to the indoor environment. This type of heating system can cause a negative pressure within the occupied space when in operation, causing SS vapors to enter the heated space more readily. This is especially true if cold air returns are blocked or not adequately sized for the blower fan.

Over insulating and effectively weatherproofing a building can contribute to less ventilation of the indoor area, and lead to the accumulation of contaminants in the indoor space. Conversely, an indoor space that is not heated, that has exterior walls that are not well sealed, that has roof top air exchange vents, and/or a number of large doors which are in use (such as a warehouse or older industrial space) can lead to the additional exchange of indoor air with air from outside the building, which can inhibit subsurface vapors from accumulating within a building.

3.0 BUILDINGS INVESTIGATED AND RESULTS

Figure 1 identifies the nine buildings investigated, including the ARF, Buildings 326, 407, 532, 592, 595, and 596, and the Guard Shack located on properties owned and/or controlled by the POT, and the OCC Office Building. These buildings were selected based on their proximity to the groundwater VOC plume, which is either below (regardless of depth) or within 100 ft of the buildings, and a component of groundwater flow towards Commencement Bay further to the north of the Properties. The VI pathway may be complete at buildings that are not within the 1,000 µg/L TCVOC groundwater plume area shown on Figure 1 and buildings outside this area within 100 ft are investigated and considered for mitigation measures on an individual basis by GSH. Currently, there are no other buildings to be assessed. Table 1 provides a summary of available information for each of the nine buildings investigated (e.g., tenant name, use, dimensions, depth to groundwater, description of heating, ventilation, and air conditioning/HVAC, etc.).

The building investigations include three sampling events, round one, round two, and round three. Round one was completed in early spring, round two was completed in the summer, with round three completed during the winter (heating season). The general sample locations for the investigated buildings are presented on Figure 1.

Round One

SS vapor and IA quality was investigated through the installation and sampling of SS vapor probes at 17 locations inside the nine buildings and concurrent collection of IA samples. Although the Work Plan originally proposed the installation of 19 SS vapor probes, complications with utility clearance reduced the number to 18, as a suitable probe location was not identified for the Guard Shack. The deletion of the proposed SS vapor probe at the Guard Shack was originally conveyed to the USEPA in an April 4, 2013 email from GSH's Clint Babcock to the USEPA's Jonathan Williams and was again discussed and its deletion approved on the June 11, 2013 teleconference between GSH, USEPA, and POT.

Prior to the installation of any SS vapor probes, a borehole clearance was completed at each drilling location with the assistance of a private utility locator. The utility locator identified any potential buried utilities in the vicinity of the planned sampling locations. When anomalies were located within the clearance area, the probe location was moved as necessary. Following successful borehole clearance, drilling and installation of the SS vapor probes was completed. As referenced previously in this report, in the case of the

Guard Shack, the size of the building prevented the completion of an accurate utility clearance; therefore, no SS vapor probe could be installed at that building.

Prior to sample collection, the building indoor environments were surveyed to identify and account for potential VOC emitters (especially those that may emit the same VOCs potentially present in the sub-slab). Where practical, the building tenants were asked to remove, isolate, or control the potential emitters (e.g., cleaners, solvents, paints, adhesives, etc.) prior to and during the sampling. Where it was determined not feasible to remove or isolate potential general indoor contaminant sources, an IA monitoring location was added to account for the potential contribution from these background sources. A summary of the indoor environment surveys is provided in the following sections.

Round one sampling was initiated on April 17 and completed on April 26, 2013. Weekend sampling was necessary for locations within Buildings 592, 595, and 596 in order to meet tenant requests. Operations of the heating and cooling systems during the sampling event were confirmed with building tenants to remain consistent with weekday activities, to reflect normal occupied conditions. IA sample locations were selected adjacent to the SS vapor probes where practical. Two additional IA samples were collected in areas identified as having potential indoor sources of VOCs. OA samples were collected each day of SS/IA sampling. OA sample locations were selected to represent background ambient air conditions on the upwind exterior of the buildings based on wind direction observations made at the start of each sampling day.

The IA and OA samples at each building were collected over a 24-hour period. Each SS vapor sample was collected over a 2-hour period concurrent with associated IA and OA sampling activities. Weather conditions were recorded at the start of each sampling day. Precipitation observations were made with an on Site rain gauge. SS vapor probe installation, and SS, IA, and OA sampling followed the procedures detailed in Appendix A of the Work Plan.

Round Two

SS vapor and IA quality was investigated through re-sampling SS and IA locations from round one in five of the nine buildings, including Buildings 326, 532, 592, 595, and 596.

As noted in Section 2.1, a second building survey was conducted to determine the potential presence of indoor sources that may contribute to indoor air quality prior to the round two sampling.

Round two sampling was initiated on June 24 and completed on July 9, 2013. As was done in round one, normal building conditions were maintained during the sample period.

In addition to the re-sampling locations, six additional IA samples were collected in areas identified as having potential indoor sources of VOCs and in centrally located areas to represent potential worst-case (upper bound) vapor intrusion points.

SS vapor samples were collected over a 2-hour period. The IA and OA passive samples were collected concurrently over a 7-day period beginning on the day the corresponding building SS samples were collected.

Round Three

SS vapor and IA quality was investigated through re-sampling SS and IA locations from round one and round two in five of the nine buildings, including Buildings 407, 592, 595, 596, and the ARF. At the request of USEPA, 7 new SS probes were installed prior to the round three sampling event. New SS probe locations are shown on Figure 1. In addition to the new SS locations, 12 IA sampling locations were added. These locations were selected with input from USEPA to identify new potential source areas, to represent potential worst-case (upper bound) vapor intrusion points (i.e., centrally located) and to address specific small office and regularly occupied spaces previously excluded from sampling priorities.

Prior to the installation of any new SS vapor probes, a borehole clearance was completed at each drilling location with the assistance of a private utility locator. The utility locator identified any potential buried utilities in the vicinity of the planned sampling locations. When anomalies were located within the clearance area, the probe location was moved as necessary. Numerous anomalies were identified in the center of the ARF maintenance area, therefore the SS probe was shifted a few feet west of center. This location however, is still closer to the center of the slab than the edge. Following successful borehole clearance, drilling and installation of the SS vapor probes was completed.

As with round two, building surveys were conducted to determine the potential presence of indoor sources that may contribute to indoor air quality prior to the round three sampling. A summary of the indoor environment surveys is provided in the following sections.

Round three sampling was initiated on March 11 and completed on March 21, 2014. Partial weekend sampling was necessary for locations within Buildings 596 and ARF in order to meet schedule demands and tenant requests. Sampling within the ARF maintenance area and Building 596 were initiated on Friday, March 14 and completed on Saturday March 15. Both buildings were occupied as each facility had shifts working through the weekend. As with previous rounds, the operations of the heating systems during the sampling event were confirmed with building tenants to remain consistent with weekday activities, to reflect normal occupied conditions.

IA sample locations were selected adjacent to the SS vapor probes where practical. Two additional IA samples were collected in areas identified as having potential indoor sources of VOCs. OA samples were collected concurrent with SS/IA sampling. OA sample locations were selected to represent background ambient air conditions on the upwind exterior of the buildings based on wind direction observations made at the time of deployment of the sampling equipment.

The IA and OA Summa canister samples at each building were collected over a 24-hour period. Each SS vapor sample was collected over a 2-hour period concurrent with associated IA and OA sampling activities. Passive Radiello sampling badges, where deployed, were exposed for a 7-day sampling duration. Passive samplers set out of doors (OA samples) were protected from the weather with a small metal shroud. The shroud allowed adequate air circulation but sheltered the cartridge from precipitation.

Weather conditions were recorded at the start of each sampling day. Precipitation observations were made with an onSite rain gauge with supplemental information gathered from a local Tacoma weather station. SS vapor probe installation, and SS, IA, and OA sampling followed the procedures detailed in the Work Plan and associated addenda.

All Summa canister samples submitted to the laboratory (ALS Environmental in Simi Valley, CA - a Washington State certified laboratory) were analyzed using EPA Method TO-15 and TO-15 SIM for selected target analytes. All passive samples were analyzed using EPA Method TO-17. The Data Quality Assessment and Validation memoranda are presented in Appendix C and the laboratory reports are provided in Appendix D. The IA analytical results were compared to current MTCA Method B screening levels originally presented in Ecology's Draft VI Guidance (Ecology, 2009; Table B-1), the IA short-term screening level for TCE (8.4 micrograms per cubic meter [$\mu\text{g}/\text{m}^3$]), and USEPA's November 2012 Regional Screening Levels (RSLs). The SS analytical results were compared to screening levels derived from the above screening levels multiplied by an attenuation factor of 0.1 recommended by EPA (USEPA, 2009)

and Ecology (Ecology 2009). The list of target analytes and applicable screening levels along with method reporting limits are presented in Table 2.

Discussion of reporting limits (RLs) and detection limits (DLs)

Discussion of reporting limits (RLs) and detection limits (DLs) for each sampling round are present below.

Round One

While the RLs for all of the laboratory blanks met the values indicated in Table 2, each sample canister had a dilution factor applied based on the beginning and ending pressures, which affected the DLs and RLs for the sample. Additionally, some of the sample canisters required additional dilution due to high analyte concentrations. The RLs for all not detected parameters in all IA and SS samples were equal to or less than the applicable IA or SS screening level with the following exceptions:

- For 1,1,2,2-tetrachloroethane (1,1,2,2-PCA), the most stringent IA screening level ($0.043 \mu\text{g}/\text{m}^3$) was marginally exceeded by the RL in sample IA-12 ($0.046 \mu\text{g}/\text{m}^3$)
- For 1,1,2-trichloroethane (1,1,2-TCA), the most stringent IA screening level ($0.16 \mu\text{g}/\text{m}^3$) was marginally exceeded by the RL in samples IA-3 ($0.17 \mu\text{g}/\text{m}^3$), IA-10 ($0.17 \mu\text{g}/\text{m}^3$), and IA-12 ($0.18 \mu\text{g}/\text{m}^3$)
- For chloroform, the most stringent IA screening level ($0.11 \mu\text{g}/\text{m}^3$) was marginally exceeded by the RL in sample IA-9 ($0.15 \mu\text{g}/\text{m}^3$)
- For Building 595 and the OCC Office Building, some SS screening levels were exceeded by the RLs in SS samples because of dilution as a result of high analyte concentrations within the sample

These occurrences are identified in the tables of this report. As seen above, RL exceedances of the IA screening levels are isolated and marginal. Additionally, if a positive detection was observed for any compound below the RL in a sample, then the laboratory was instructed to report the result. Therefore, the results are considered sufficiently accurate for the purpose of the investigation.

Round Two

The round two sampling event used sub-slab soil vapor sampling procedures and equipment identical to the round one event, and 7-day passive sampling procedures and equipment for IA and OA sample collection. The RLs for all of the laboratory blanks met the values indicated in Table 2, however, as with round one each SS soil vapor sample canister collected during round two had a dilution factor applied based on the

beginning and ending pressures, which affected the DLs and RLs for the sample. Additionally, some of the sample canisters required additional dilution due to high analyte concentrations. The RLs for all not detected parameters in all SS samples were equal to or less than the applicable SS screening level with the following exceptions:

- For 1,1,2,2-PCA, the most stringent SS screening level ($0.43 \mu\text{g}/\text{m}^3$) was marginally exceeded by the DL in sample SS-4 ($0.81 \mu\text{g}/\text{m}^3$) and SS-5 ($0.75 \mu\text{g}/\text{m}^3$)
- For hexachlorobutadiene (HCBD), the most stringent SS screening level ($1.1 \mu\text{g}/\text{m}^3$) was marginally exceeded by the DL in sample SS-4 ($1.6 \mu\text{g}/\text{m}^3$) and SS-5 ($1.5 \mu\text{g}/\text{m}^3$)

These occurrences are identified in a table of this report. As seen above, RL exceedances of the SS screening levels are isolated and marginal. Additionally, if a positive detection was observed for any compound below the RL in a sample, then the laboratory was instructed to report the result. Therefore, the results are considered sufficiently accurate for the purpose of the investigation.

Round Three

The round three sampling event used SS soil vapor, IA, and OA Summa canister sampling procedures and equipment identical to the round one event, and IA and OA 7-day passive sampling procedures and equipment identical to those used in round two. The RLs for all not detected parameters in all IA and SS samples were equal to or less than the applicable IA or SS screening level with the following exceptions:

- For 1,1,2-TCA, the most stringent IA screening level ($0.16 \mu\text{g}/\text{m}^3$) was marginally exceeded by the RL in samples IA-31 ($0.17 \mu\text{g}/\text{m}^3$) and IA-38 ($0.57 \mu\text{g}/\text{m}^3$)
- For 1,1,2,2-PCA, the most stringent IA screening level ($0.043 \mu\text{g}/\text{m}^3$) was exceeded by the DL in sample IA-38 ($0.14 \mu\text{g}/\text{m}^3$)
- For 1,1,2,2-PCA, the most stringent SS screening level ($0.43 \mu\text{g}/\text{m}^3$) was marginally exceeded by the DL in sample SS-4 ($0.86 \mu\text{g}/\text{m}^3$)
- For 1,1,2-TCA, the most stringent SS screening level ($1.6 \mu\text{g}/\text{m}^3$) was marginally exceeded by the DL in sample SS-4 ($3.4 \mu\text{g}/\text{m}^3$) and SS-5 ($1.7 \mu\text{g}/\text{m}^3$)

These occurrences are identified in a table of this report. As seen above, RL exceedances of the SS screening levels are isolated and marginal. Additionally, if a positive detection was observed for any compound below the RL in a sample, then the laboratory was instructed to report the result. Therefore, the results are considered sufficiently accurate for the purpose of the investigation.

The IA analytical results were assessed with respect to the background concentrations detected in the OA samples and potential indoor VOC emitters. The USEPA's interim final Vapor Intrusion Framework (USEPA, 2009) and Ecology's Guidance for Evaluating Soil Vapor Intrusion in Washington State (Ecology, 2009) were consulted regarding whether additional characterization activities or mitigation by GSH is warranted for each building, based on detected concentrations of SS analytes relative to IA sample concentrations.

As stated in Ecology's Draft VI Guidance (Ecology 2009; Section 3.2.3) "*The vapor intrusion assessment focus is not on general indoor air contamination, but on the subsurface contribution to indoor air contamination. It is expected that most measurements of indoor air VOCs will be affected by "background" sources, and Ecology recommends that measured indoor air concentrations be corrected for this contribution if it can be done conservatively. Failing to accurately account for background VOC contributions can lead to exaggerating the perceived degree of vapor intrusion and installing unneeded mitigation systems.*" The section further explains: "*There are numerous methods for estimating background indoor VOC concentrations...Indoor air measurements may be adjusted (that is, corrected) by subtracting these estimates when the estimates are based on OA measurements concurrently taken upwind of the building(s) in which indoor air samples are being obtained.*"

For each building, the sections below discuss:

- Building properties and usage
- Sampling location rationale and pre-sampling survey results
- Sampling results
- Recommendations for additional work

3.1 ARMY RESERVE FACILITY

Figure 2 shows the sample locations and layout of the ARF.

Building Properties and Usage

The ARF is a 3-story building with offices, a small armory, and various workshops. The armory and workshops are on the first floor, and offices and common rooms are present on all three floors. Ceilings are 9-ft drop ceilings, except for the front entry (45-ft) and storage area (~25-ft). There is little detailed information available on construction of this building. Construction is brick on a concrete slab. The observed slab thickness is

between 5.5 and 6 inches and appears in good condition. The location of load bearing foundations or footers, column construction, office framing, internal sub-floor utilities, etc., is unknown. Building additions protruding from the north end house a large maintenance area. There are a large number of offices on the first floor that are framed above the slab. Vapors could potentially intrude into this building through cracks in the floor slab, unsealed utility penetrations, and un-caulked floor/wall or expansion joints.

The large maintenance area is located at the very north end of the building. Three chemical storage lockers and parts cleaning stations are located within this area. Several pieces of large metal working equipment are located in this area including a large drill press, metal lath, and numerous smaller table-mounted tools. This area is used for the maintenance of the facilities vehicles and vessels. The concrete slab in the maintenance area is in good condition.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

Three SS vapor probes were installed where concurrent SS/IA samples were collected, as discussed below.

Sample pair SS/IA-17 was located within a large mixed-use area referred to by Army Reserve personnel as "Unit Storage". This area is used primarily for storage of equipment but also has areas for small office cubicles. A small quantity of hand cleaning products was observed in a storage cage adjacent to the sampling area. The material observed did not appear to contain potential VOC emitters. All materials were stored within locked cages, and therefore contents of each individual cage could not be reviewed.

Sample pair SS/IA-18 was located within an office space (Office 102) located near the southwestern corner of the building. This office was selected based on its location relative to the groundwater plume with respect to the rest of the building and the office space was vacant at the time of sampling, thereby limiting interference with tenant activities. No obvious potential VOC emitters were observed at this location. The initial IA canister deployed at sample location IA-18 was observed to be filling at a rate faster than designed. It was determined that a second canister should be deployed to collect a full 24-hour sample (IA-22). The initial canister (IA-18) was allowed to continue to fill until it reached an internal pressure of less than 10 inches of mercury and was then closed after 9 hours of sampling. Sample IA-22 was allowed to fill for 24 hours.

Sample pair SS/IA-19 was located in the northern portion of the building to provide representative coverage of the building footprint. Initially, an office location was chosen further to the north but buried utilities necessitated the location be shifted across the hall to the south to a small break room. No obvious potential VOC emitters were observed at this location.

Sampling within the ARF was initiated on April 19, 2013 with the 24-hour samples completed the following day. The associated OA sample for this building (OA-18) was collected outside of the building approximately midway along the western wall. Weather conditions were calm, with mild winds out of the west. No precipitation was noted.

Round Two

Discussions with the USEPA and POT during the June 11, 2013 conference call resulted in the decision to exclude the ARF from the round two sampling event.

Round Three

Comments received from the USEPA regarding the sampling results of rounds one and two resulted in the decision to include the ARF in the round three sampling event. In addition to including the ARF building in round three, USEPA requested that the maintenance area to the north that was previously excluded from the sampling be added. A total of 13 Summa canister samples were collected during round three including at five SS locations paired with five IA locations (two new and three existing pairs), one IA location near a potential source area, and one OA location (2 samples collected on separate dates). Additionally, two passive samples were collected, one from IA location 19 (IA-19P) and one from OA location 18 (OA-18P), as specified by USEPA. A review of mechanical rooms conducted on February 10, 2014 in this building did not reveal any preferential pathways for vapor migration, with the exception of the fire sprinkler room. The watermain entering this room penetrated the slab and the void space surrounding the pipe was not sealed. The mechanical room; however, has a vented door to the outside with no access to the interior building space. No samples were collected from the mechanical rooms associated with the ARF building.

Sample pair SS/IA-17 was unchanged from round one. Consistent with the round one sampling event the materials observed in this area did not appear to contain potential VOC emitters. All materials were stored within locked cages, and therefore contents of each individual cage could not be reviewed.

Sample pair SS/IA-18 was unchanged from round one. No obvious potential VOC emitters were observed at this location and the office is currently vacant.

Sample pair SS/IA-19 was unchanged from round one. No obvious potential VOC emitters were observed at this location.

Sample pair SS/IA-29 was centrally located within the "Unit Storage" area to represent a potential worst-case (upper bound) vapor intrusion point. Consistent with the round one sampling event the material observed in this area did not appear to contain potential VOC emitters. All materials were stored within locked cages, and therefore contents of each individual cage could not be reviewed.

Sample pair SS/IA-30 was added to assess the center of the maintenance area to represent a potential worst-case (upper bound) vapor intrusion point in this area. A review of the maintenance area identified a location in the southeast portion used for the cleaning of parts and the storage of chemicals in a number of chemical storage lockers. A review of the chemical lockers in this area revealed 56 different products stored. A review of the MSDSs for these products has identified methylene chloride (MC), chloride, PCE, TCE, naphthenic compounds, and petroleum distillates. These chemicals are analytes with the potential to be present in the indoor air environment due to the storage and use in this area. A list of the chemicals by MSDS number is provided in Appendix A along with all the MSDS sheets maintained by the ARF staff for chemicals potentially stored and used on site.

The sample IA-31 was collected in close proximity to the parts washing area and chemical storage lockers in the maintenance area to assess the contributions of potential VOC emitters in this area.

The indoor and ambient air sampling was initiated on March 11, 2014 using passive sampling equipment at IA-19P and OA-18P. The samplers were retrieved 7 days later. Summa canister samples within the ARF were collected over a 3-day period. Sampling at locations 17, 18, 19, and 29 was initiated on March 13, 2014, with the 24-hour samples completed the following day. The associated OA sample for this building (OA-18) was collected outside of the building approximately midway along the western wall. Weather conditions were calm, with winds out of the west. No precipitation was noted. Sample locations 30 and 31 were sampled on March 14, with 24-hour samples completed the following day. A second OA sample (OA-30) was collected concurrent with IA-30 and IA-31. Weather conditions were calm, with winds out of the west. Trace precipitation was noted on March 14 and 15.

Sampling Results

Round One

Analytical results are presented in Table 3 and detected parameters summarized on Figure 2.

IA concentrations of benzene (BZ), carbon tetrachloride (CT), chloroform, and naphthalene exceeded IA screening levels.

IA concentrations of BZ (up to 0.69 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.32 $\mu\text{g}/\text{m}^3$) at all three IA sampling locations, and were similar to the OA concentration (0.72 $\mu\text{g}/\text{m}^3$). BZ was not detected in SS samples (the RL for BZ in SS samples [up to 0.71 $\mu\text{g}/\text{m}^3$] was less than the OA concentration). It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an outdoor source.

IA concentrations of CT (up to 0.51 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.42 $\mu\text{g}/\text{m}^3$) at all three IA sampling locations, and were similar to the OA concentration (0.48 $\mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source. IA concentrations were lower than SS concentrations (up to 6.5 $\mu\text{g}/\text{m}^3$). The SS concentration of CT at the northernmost vapor probe (6.5 $\mu\text{g}/\text{m}^3$ at SS-19) exceeded a SS MTCA screening level (4.2 $\mu\text{g}/\text{m}^3$), but SS screening level exceedances were not noted closer to the OCC groundwater plume further south.

IA concentrations of chloroform at IA-18/22 (up to 0.14 J $\mu\text{g}/\text{m}^3$) and IA-19 (0.18 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.11 $\mu\text{g}/\text{m}^3$), and were slightly higher than the OA concentration (0.089 J $\mu\text{g}/\text{m}^3$). Chloroform was detected at higher concentrations in the paired SS-18 and SS-19 samples (up to 0.79 $\mu\text{g}/\text{m}^3$) but below SS screening levels. According to the Agency for Toxic Substances and Disease Registry's Toxicological Profile for chloroform¹ (page 202), "*One of the most significant indoor sources of chloroform is chlorinated tap water*". As discussed above, the observed floor slab thickness at the ARF is between 5.5 and 6 inches and appears in good condition. SS concentrations of chloroform less than the SS screening levels are therefore not likely the source of IA screening level exceedances. It is therefore concluded that IA MTCA screening level exceedances for chloroform are likely attributable to an indoor source.

¹ <http://www.atsdr.cdc.gov/ToxProfiles/tp6.pdf>

The IA concentration of naphthalene at IA-17 (0.62 µg/m³) exceeded an IA USEPA RSL (0.36 µg/m³) but was not detected in the paired SS-17 sample; however, the RL for naphthalene in SS-17 was elevated at 0.94 µg/m³. However, if a positive detection was observed for any compound below the RL in a sample, then the laboratory was instructed to report the result. Naphthalene was detected in the OA sample at 0.077 J µg/m³, less than the IA concentration. It is therefore concluded that the IA USEPA RSL exceedance for naphthalene is likely attributable to an indoor source.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-17</i>	<i>IA-18</i>	<i>IA-22</i>	<i>IA-19</i>
<i>Volatile Organic Compounds</i>		<i>- OA-18</i>	<i>- OA-18</i>	<i>- OA-18</i>	<i>- OA-18</i>
1,1,1-Trichloroethane	µg/m ³	0.057	0.017	0.04	0.078
1,1-Dichloroethene	µg/m ³	0.01	-	-	-
1,2,4-Trimethylbenzene	µg/m ³	0.49	0.01	0.05	-0.01
1,3,5-Trimethylbenzene	µg/m ³	0.4	0.3	0.3	0.27
1,4-Dichlorobenzene	µg/m ³	0.032	0.118	0.128	0.138
Benzene	µg/m ³	-0.03	-0.29	-0.05	-0.05
Carbon tetrachloride	µg/m ³	0.03	-0.17	-0.02	-0.02
Chloroform (Trichloromethane)	µg/m ³	0.021	0.041	0.051	0.091
Ethylbenzene	µg/m ³	0.3	0.3	-0.16	0
m&p-Xylenes	µg/m ³	1.1	1.5	-0.6	0.1
Naphthalene	µg/m ³	0.543 ^a	0.004	0.093	0.018
o-Xylene	µg/m ³	0.4	0.3	-0.1	0
Styrene	µg/m ³	0.4	-	-	0.23
Tetrachloroethene	µg/m ³	0.07	0.09	0.22	0.46
Toluene	µg/m ³	2.8	-0.9	0.1	0.4
trans-1,2-Dichloroethene	µg/m ³	0.05	-	-	0.017
Trichloroethene	µg/m ³	0.041	0.021	0	0.012
Vinyl chloride	µg/m ³	0.095	0.072	0.066	0.11

As shown in the above table, the only adjusted IA exceedance is for naphthalene at location IA-17. As noted previously, naphthalene was not detected in the sub-slab sample and therefore it may be concluded that the exceedance of naphthalene in IA is unlikely attributable to sub-slab vapor. Additionally, the potential contribution of SS CT concentrations to IA is insignificant based on the round one data given that the IA and OA concentrations are very similar.

In summary, it is concluded that IA screening level exceedances for BZ and CT are likely attributable to an outdoor source. IA screening level exceedances for chloroform and naphthalene are likely attributable to an indoor source. No specific obvious indoor sources were noted in the building; however, each individual material storage cage was not reviewed.

Round Three

Analytical results are presented in Table 3 and detected parameters summarized on Figure 2.

IA concentrations of BZ, CT, naphthalene and TCE exceeded IA screening levels.

Similar to round one sampling results, IA concentrations of BZ (up to $1.2 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.32 \mu\text{g}/\text{m}^3$) at all six IA sampling locations. Again as with round one, similar elevated BZ concentrations were measured in the OA samples, $0.62 \mu\text{g}/\text{m}^3$ in the 24-hour Summa canister samples and $0.75 \mu\text{g}/\text{m}^3$ in the 7-day passive sample. BZ was not detected in three SS samples and detected in two SS samples (up to $0.65 \mu\text{g}/\text{m}^3$ and was similar to or less than the OA concentrations and less than IA concentrations). It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an outdoor source and possibly an indoor source.

IA concentrations of CT (up to $0.48 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.42 \mu\text{g}/\text{m}^3$) at five of the six IA sampling locations, and were similar to the OA concentrations (0.45 and $0.48 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source. IA concentrations were lower than SS concentrations (up to $2.3 \mu\text{g}/\text{m}^3$) that were below screening criteria.

IA concentration of naphthalene at IA-30 ($0.90 \mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL ($0.36 \mu\text{g}/\text{m}^3$) but it was detected in the paired SS-30 sample at a lower concentration of $0.12 \mu\text{g}/\text{m}^3$ below the IA screening criteria. Naphthalene was detected in the associated OA sample at $0.14 \mu\text{g}/\text{m}^3$, less than the IA concentration. Naphthalene is a ubiquitous contaminant associated with hydrocarbon combustion, pesticides and deodorants. Specifically within the maintenance area, vehicles and equipment are periodically operated, and vehicle exhausts may be concentrated in this area. During sampling procedures, the temporary operation of a forklift was noted, along with the opening of a large garage door. After the vehicle was removed, the door was closed. It is therefore

concluded that the IA USEPA RSL exceedance for naphthalene is likely attributable to an indoor source.

IA concentrations of TCE at IA-30 and IA-31, located in the maintenance area, are $2.6 \mu\text{g}/\text{m}^3$ and $2.9 \mu\text{g}/\text{m}^3$, respectively, and similar. IA-31 is located adjacent to a potential VOC emitter. Both of these detections exceeded the IA MTCA screening levels (0.61 and $0.91 \mu\text{g}/\text{m}^3$). TCE was detected in the associated OA sample at $0.17 \mu\text{g}/\text{m}^3$, less than the IA concentrations. TCE was detected in the SS sample for the sampling pair SS/IA-30 at a concentration of $100 \mu\text{g}/\text{m}^3$, above screening criteria. The concentrations in the four other paired IA and SS samples were below the screening criteria. These four locations are between the OCC source area and location SS-30. As detailed above during the pre-sampling inventory of the chemical storage lockers in the maintenance area, a potential source of TCE was identified in a product named "Safety Solvent" (MSDS #167 in attached ARF MSDS Appendix). Considering the use of TCE at this location and the presence of floor drains and an oil water separator, there is a potential for the TCE detection in the SS sample to be related to local site conditions and is not associated with the identified OCC plume. Additionally, considering the storage of cleaning products containing TCE and their potential use in this area and that the concentration at IA-31 (potential VOC source) is slightly greater than the concentration at IA-30, it is concluded that IA MTCA screening level exceedances for TCE are likely attributable to an indoor source and potentially subsurface source unrelated to OCC. The IA TCE concentrations (up to $2.9 \mu\text{g}/\text{m}^3$) are below the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$.

The SS concentration of chloroform at SS-30 ($2.1 \mu\text{g}/\text{m}^3$) exceeded a SS MTCA screening level ($1.1 \mu\text{g}/\text{m}^3$); however, it was detected in the other SS samples (up to $0.49 \mu\text{g}/\text{m}^3$) located closer to the OCC source area and all IA samples (up to $0.10 \mu\text{g}/\text{m}^3$) below screening criteria. The IA concentrations are similar to the OA concentrations (up to $0.085 \mu\text{g}/\text{m}^3$). It is therefore concluded that SS concentrations are likely attributable to a potential subsurface source unrelated to OCC and is being adequately attenuated.

The analytical results for the passive samples were similar to the Summa canisters collected at the same location for both IA and OA.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-17</i>	<i>IA-18</i>	<i>IA-19</i>	<i>IA-29</i>	<i>IA-30</i>	<i>IA-31</i>
<i>Volatile Organic Compounds</i>		<i>- OA-18</i>	<i>- OA-18</i>	<i>- OA-18</i>	<i>- OA-18</i>	<i>- OA-30</i>	<i>- OA-30</i>
1,1,1-Trichloroethane	µg/m ³	0.043	0.007	0.046	0.26	0.036	0.058
1,1-Dichloroethene	µg/m ³	-	-	-	-	-	-
1,2,4-Trimethylbenzene	µg/m ³	0.88	0.50	0.29	0.60	0.73	0.71
1,3,5-Trimethylbenzene	µg/m ³	0.288	0.148	0.078	0.188	0.193	0.183
1,4-Dichlorobenzene	µg/m ³	0.038	0.036	0.066	0.031	0.001	0.002
Benzene	µg/m ³	0.48 ^f	0.25	0.18	0.34 ^f	0.58 ^f	0.48 ^f
Carbon tetrachloride	µg/m ³	-0.010	-0.050	0.00	-0.010	-0.030	-0.020
Chloroform (Trichloromethane)	µg/m ³	0.018	0.018	0.012	0.016	0.011	0.015
cis-1,2-Dichloroethene	µg/m ³	0.006	0.013	0.013	0.003	-0.019	-0.018
Ethylbenzene	µg/m ³	0.46	0.26	0.08	0.36	0.20	0.20
m&p-Xylenes	µg/m ³	1.5	1.1	0.2	1.3	0.9	0.2
Methylene chloride	µg/m ³	0.10	0.01	-0.04	0.20	0.01	0.29
Naphthalene	µg/m ³	0.25	0.18	0.07	0.22	0.76 ^a	0.15
o-Xylene	µg/m ³	0.57	0.37	0.07	0.47	0.30	0.20
Styrene	µg/m ³	0.30	0.23	0.07	0.22	0.06	0.14
Tetrachloroethene	µg/m ³	0.01	0.11	0.02	0.37	0.03	0.19
Toluene	µg/m ³	1.7	-0.20	-0.6	1.0	2.1	2.3
trans-1,2-Dichloroethene	µg/m ³	-	-	-0.001	-	-0.001	0.001
Trichloroethene	µg/m ³	0.003	0.026	0.057	0.227	2.43 ^{fg}	2.73 ^{fg}
Vinyl chloride	µg/m ³	0.037	0.014	0.026	0.030	-0.004	-0.002

As shown in the above table, there are adjusted IA exceedances of BZ at locations IA-17, IA-29, IA-30, and IA-31, of naphthalene at location IA-30, and of TCE at locations IA-30 and IA-31. As noted previously, BZ and naphthalene were not detected above screening criteria in SS samples and the SS concentrations are generally less than IA concentrations, and therefore it may be concluded that the exceedance of BZ and naphthalene in IA is unlikely attributable to sub-slab vapor. The TCE exceedances are associated with the maintenance area and as noted previously are likely attributable to an indoor source and potentially subsurface source unrelated to OCC.

In summary, it is concluded that IA screening level exceedances for BZ and CT are likely attributable to an outdoor source and possibly an indoor source for BZ. IA screening level exceedance for naphthalene is likely attributable to an indoor source. Potential indoor sources include the operation of vehicles in the maintenance area. IA detections of TCE are attributed to a potential indoor air source and potentially an isolated source beneath the maintenance area unrelated to the OCC plume.

Round One and Round Three Comparison

The following table presents a side-by-side comparison of the round one and round three sub-slab vapor data.

<i>Volatile Organic Compounds</i>		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
		<i>SS-17</i>	<i>SS-17</i>	<i>SS-18</i>	<i>SS-18</i>	<i>SS-19</i>	<i>SS-19</i>
1,1,1-Trichloroethane	µg/m ³	1.6	1.0	0.19 J	0.16	1.2	0.91
1,1,2,2-Tetrachloroethane	µg/m ³	0.24 U	0.20 U	0.20 U	0.037 U	0.038 U	0.19 U
1,1,2-Trichloroethane	µg/m ³	0.94 U	0.79 U	0.81 U	0.15 U	0.15 U	0.78 U
1,1-Dichloroethene	µg/m ³	0.24 U	0.20 U	0.20 U	0.037 U	0.038 U	0.19 U
1,2,4-Trichlorobenzene	µg/m ³	0.24 U	0.20 U	0.20 U	0.037 U	0.038 U	0.19 U
1,2,4-Trimethylbenzene	µg/m ³	4.7 U	0.084 J	4.0 U	0.029 J	0.76 U	0.78 U
1,3,5-Trimethylbenzene	µg/m ³	4.7 U	0.79 U	4.0 U	0.15 U	0.76 U	0.78 U
1,4-Dichlorobenzene	µg/m ³	0.24 U	0.20 U	0.20 U	0.014 J	0.038 U	0.19 U
Benzene	µg/m ³	0.71 U	0.59 U	0.60 U	0.11 U	0.11 U	0.58 U
Carbon tetrachloride	µg/m ³	1.6	1.2	1.9	1.8	6.5	2.3
Chloroform	µg/m ³	0.25 J	0.18 J	0.54 J	0.49	0.79	0.35 J
cis-1,2-Dichloroethene	µg/m ³	0.24 U	0.20 U	0.20 U	0.037 U	0.038 U	0.19 U
Ethylbenzene	µg/m ³	0.045 J	0.081 J	0.047 J	0.039 J	0.049 J	0.78 U
Hexachlorobutadiene	µg/m ³	0.24 U	0.20 U	0.20 U	0.037 U	0.038 U	0.19 U
m&p-Xylenes	µg/m ³	0.15 J	0.23 J	0.15 J	0.13 J	0.20	0.15 J
Methylene chloride	µg/m ³	4.7 UJ	0.79 U	4.0 UJ	0.15 U	0.76 UJ	0.78 U
Naphthalene	µg/m ³	0.94 U	0.14 J	0.81 U	0.087 J	0.057 J	0.19 J
o-Xylene	µg/m ³	0.050 J	0.098 J	0.056 J	0.047 J	0.065 J	0.072 J
Styrene	µg/m ³	4.7 U	0.79 U	4.0 U	0.15 U	0.76 U	0.78 U
Tetrachloroethene	µg/m ³	0.70	1.0	5.0	4.5	5.4	5.1
Toluene	µg/m ³	0.94 U	1.1	0.81 U	1.5	0.27 J	2.6
trans-1,2-Dichloroethene	µg/m ³	0.24 U	0.20 U	0.20 U	0.012 J	0.038 U	0.19 U
Trichloroethene	µg/m ³	0.084 J	0.42	1.3	1.6	0.23	0.45
Vinyl chloride	µg/m ³	0.24 U	0.20 U	0.20 U	0.037 U	0.038 U	0.19 U

The reported concentrations for the round three samples are similar to the reported concentrations for the round one samples, with the notable exception of CT at SS-19. The round three concentration is lower and similar to CT concentrations at other SS probes including the two new SS locations. Variability for the parameters detected above 1 ppbv includes: slight decreases in concentrations in round three for 1,1,1-trichloroethane (1,1,1-TCA), CT, and PCE; a slight increase for TCE; and an

increase for toluene. These data suggest limited variability in concentrations over time and limited temporal effects. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,1,2-TCA, 1,1-dichloroethene (1,1-DCE), 1,2,4-trichlorobenzene (1,2,4-TCB), 1,3,5-trimethylbenzene (1,3,5-TMB), BZ, cis-1,2-DCE, HCBD, methylene chloride, styrene, and VC.

The following table presents a side-by-side comparison of the round one and round three indoor air data.

<i>Volatile Organic Compounds</i>		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
		<i>IA-17</i>	<i>IA -17</i>	<i>IA -18</i>	<i>IA -18</i>	<i>IA -19</i>	<i>IA -19</i>
1,1,1-Trichloroethane	µg/m ³	0.089	0.064	0.049	0.028 J	0.11	0.067
1,1,2,2-Tetrachloroethane	µg/m ³	0.038 U	0.035 U	0.041 U	0.036 U	0.039 U	0.038 U
1,1,2-Trichloroethane	µg/m ³	0.15 U	0.14 U	0.16 U	0.15 U	0.15 U	0.15 U
1,1-Dichloroethene	µg/m ³	0.010 J	0.035 U	0.041 U	0.036 U	0.039 U	0.038 U
1,2,4-Trichlorobenzene	µg/m ³	0.038 U	0.035 U	0.041 U	0.067	0.039 U	0.038 U
1,2,4-Trimethylbenzene	µg/m ³	1.3	1.1	0.82	0.72	0.80	0.51
1,3,5-Trimethylbenzene	µg/m ³	0.40 J	0.35	0.30 J	0.21	0.27 J	0.14 J
1,4-Dichlorobenzene	µg/m ³	0.054	0.061	0.14 J	0.059	0.16	0.089
Benzene	µg/m ³	0.69	1.1	0.43	0.87	0.67	0.80
Carbon tetrachloride	µg/m ³	0.51	0.47	0.31	0.43	0.46	0.48
Chloroform	µg/m ³	0.11 J	0.10 J	0.13 J	0.10 J	0.18	0.094 J
cis-1,2-Dichloroethene	µg/m ³	0.038 U	0.033 J	0.041 U	0.040	0.039 U	0.040
Ethylbenzene	µg/m ³	1.4	1.2	1.4	1.0	1.1	0.82
Hexachlorobutadiene	µg/m ³	0.038 U	0.035 U	0.041 U	0.036 U	0.039 U	0.038 U
m&p-Xylenes	µg/m ³	4.9	4.3	5.3	3.9	3.9	3.0
Methylene chloride	µg/m ³	0.91 U	0.50	0.82 U	0.41	0.77 U	0.36
Naphthalene	µg/m ³	0.62	0.35	0.081 J	0.28	0.095 J	0.17
o-Xylene	µg/m ³	1.7	1.5	1.6	1.3	1.3	1.0
Styrene	µg/m ³	0.40 J	0.47	0.82 U	0.40	0.23 J	0.24
Tetrachloroethene	µg/m ³	0.21	0.19	0.23	0.29	0.60	0.20
Toluene	µg/m ³	4.9	4.8	1.2	2.9	2.5	2.5
trans-1,2-Dichloroethene	µg/m ³	0.050	0.035 U	0.041 U	0.036 U	0.017 J	0.011 J
Trichloroethene	µg/m ³	0.074	0.076	0.054	0.099	0.045	0.13
Vinyl chloride	µg/m ³	0.095	0.049	0.072	0.026 J	0.11	0.038

The reported concentrations for the round three samples are similar to the reported concentrations for the round one samples. Variability for the parameters detected above 1 ppbv includes: slight decreases in concentrations in round three for

1,2,4-trimethylbenzene (1,2,4-TMB), ethylbenzene (EB), m&p-xylenes, and o-xylene; and a slight decrease (SS-17)/increase (SS-18) for toluene. These data suggest limited variability in concentrations over time and limited temporal effects. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,1,2-TCA, and HCBD.

Additional Analysis of the Data

The sub-slab concentrations may be contributing to indoor air concentrations via the vapor intrusion pathway. However, the contributions would not be significant for the parameters that were detected in sub-slab samples at concentrations below the cancer screening values and below HQs, and in some cases below indoor air concentrations. This is the case for all parameters during round one sampling except CT at sub-slab probe location SS-19. During round three sampling the only exceptions were chloroform and TCE at sub-slab probe location SS-30. As noted above, locations SS/IA-19 and SS/IA-30 are two of the northernmost probe furthest from the OCC groundwater plume and no exceedances were measured in the SS probes closer to the OCC groundwater plume.

The following is a discussion of the most recent, shallowest, and nearby groundwater data presented in Table 3 with respect to SS analytical results. Detected parameters in a groundwater sample collected from location 77C-25 include cis-1,2-DCE, m&p-xylenes, PCE, toluene, trans-1,2-dichloroethene (trans-1,2-DCE), TCE, and VC as shown in Table 3. Parameters that were detected in sub-slab air samples but were not detected in groundwater include CT, chloroform, EB, and o-xylene. The remaining detected parameters in sub-slab air samples were not reported for the groundwater sample.

The following discusses a comparison of the round one analytical results to non-cancer screening levels for chronic exposures at values that represent a hazard quotient of 0.1 (adjusted HQ) except for TCE for purposes of evaluating short-term exposures to women of reproductive age. RLs are above the EPA RSL adjusted HQ for 1,1,2-TCA for indoor and sub-slab. The RLs for 1,1,2-TCA are less than 20 percent of the EPA RSL HQ and would not contribute to a cumulative hazard index (HI) since the results are non-detect. No concentrations exceeded the EPA RSL adjusted HQs for indoor air and sub-slab. Since no detected concentrations exceed the EPA RSL adjusted HQs, cumulative non-cancer health effects would be less than a HI of 1. Concentrations exceed the MTCA adjusted HQs for 1,2,4-TMB and naphthalene for indoor air. These two parameters have different primary target organs (blood system and body weight). The exceedances are less than 45 percent of the MTCA HQs and would not contribute to cumulative primary target organ HIs greater than 1. Additionally, The concentrations of

1,2,4-TMB and naphthalene in indoor air are likely attributable to indoor and/or outdoor sources since they were not detected in sub-slab with one exception for naphthalene that does not exceed the MTCA adjusted HQ and is less than the indoor air concentrations. RLs are above the MTCA adjusted HQ for 1,2,4-TMB for sub-slab. The RLs for 1,2,4-TMB are less than 15 percent of the MTCA HQ and would not contribute to a cumulative HI since the results are non-detect. Concentrations exceed the MTCA adjusted HQ for TCE for sub-slab. This parameter has a different primary target organ (developmental effects) than the exceedances noted for indoor air. The exceedances are less than 15 percent of the MTCA HQ and would not contribute to a cumulative primary target organ HI greater than 1. The above discussion is applicable to the round three data since the round three results are similar to the round one results as discussed above.

Recommendation

No further action by GSH is proposed for this building, due to the apparent outdoor source, indoor source, and potential localized subsurface source unrelated to the OCC Site based on the data presented herein.

3.2 BUILDING 326

Figure 3 shows the sample locations and layout of Building 326.

Building Properties and Usage

Building 326 is a 1-story office building of wood frame and metal siding construction on a concrete slab on grade foundation. Where visible, the condition of the concrete slab is good. During probe installation, the slab thickness was measured at two locations as 5.75 and 5 inches. There are two independent occupied office spaces (Nano Silicates and SafeBoats) within the building comprising approximately 11,000 square ft in total. The majority of the building has 8-ft drop ceilings. There is an open-air atrium/garden in the central part of this building. The HVAC system is rooftop forced air with ductwork installed on the rooftop and within the ceiling. Vapors could potentially intrude into this building through cracks in the floor slab, unsealed utility penetrations, and un-caulked floor/wall or expansion joints.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

The sampling locations were selected considering tenant usage and VOC plume location relative to occupied office areas. SafeBoats occupies the eastern half of the building and Nano Silicates occupies the western half. These office spaces, which are located on opposite ends of the building, have separate entrances and exits.

Two SS vapor probes were installed where concurrent SS/IA samples were to be collected, as discussed below. However, complications prevented the collection of a SS sample collection at one location, and therefore only one SS/IA sample pair was collected within this building at location 7.

Nano Silicates occupies the western half of the building. According to the tenant, this portion of the building was renovated within the last 2 years. Tenant improvements included painting, carpeting, and new ceramic tile floors. The tenant requested that the sample pair (SS/IA-7) be located in a vacant office space at the southwest corner of the building. This office has its own exterior door. This location was determined representative of the western half of the building and suitable to meet the needs of the investigation. During the pre-sampling survey, the unoccupied office was identified as being used for the storage of furniture, computer components, latex paint, construction adhesive, and other building materials. The tenant was asked to remove these materials from the office prior to the sampling event. The tenant complied with this request and the office was cleared of stored materials. The office is adjacent to a small lab space operated by Nano Silicates. A brief review of this room and interview with a Nano Silicates representative did not suggest the storage of any potential VOC emitters within the office building; however, the representative indicated that their neighboring shop space within Building 407 contained chemical storage lockers (this information was confirmed during the Building 407 pre-sampling survey discussed below).

One IA sample (IA-8) was collected from within the eastern portion of the building occupied by SafeBoats. The space is used exclusively as office and meeting space. Complications with utility clearance prevented a SS vapor probe from being installed in any of the smaller offices along the eastern wall of the building. Therefore, the sampling location was moved out of the office space to a hallway connecting the offices and larger cubical area. No obvious potential VOC emitters were identified in the office space to be sampled or adjacent offices. A small amount of janitorial cleaning supplies was observed in the kitchen area. Cleaning materials were not removed from this location. During the helium tracer test (designed to assess the integrity of the SS probe seal), a

detection of helium above threshold criteria suggested that the seal had been compromised. As a result, sampling of SS vapors at this location was suspended.

Sampling within Building 326 was initiated on April 23, 2013 with the 24-hour samples completed the following day. An associated OA sample for this building (OA-7) was collected outside of the building near the main entrance along the southern wall of the building. Weather conditions were partly cloudy and calm, with winds from the south, and no precipitation was observed.

Round Two

Indoor air and sub-slab vapor samples were collected at the same IA/SS sample locations as the round one event. An additional IA sample (IA-28) was collected from a small closet/IT room centrally located within the building in accordance with USEPA request. Prior to conducting the round two sampling event, a detailed survey was completed for Building 326, at which time the tenant was asked to fill out a questionnaire and provide MSDSs for all chemicals used or stored within the building. Copies of the submitted MSDSs are included in Appendix A. The survey did not identify the obvious presence of potential VOC emitters in either the Nano Silicates or SafeBoats offices.

The indoor and ambient air sampling was initiated on June 24, 2013 using passive sampling equipment. The samples were collected 7 days later. Sub-slab sampling was initiated on June 25, 2013 with the 2-hour samples completed the same day. An associated OA sample for this building (OA-7) was collected outside of the building near the main entrance along the southern wall of the building.

Round Three

Building 326 is scheduled for mitigation as discussed below and was excluded from the round three sampling event.

Sampling Results

Round One

Analytical results are presented in Table 4 and detected parameters summarized on Figure 3.

IA concentrations of 1,2,4-TMB, 1,4-dichlorobenzene (1,4-DCB), BZ, CT, chloroform, and TCE exceeded IA screening levels.

The IA concentration of 1,2,4-TMB at IA-7 ($4.7 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($3.2 \mu\text{g}/\text{m}^3$), and was similar to but higher than the OA concentration ($1.2 \mu\text{g}/\text{m}^3$). 1,2,4-TMB was not detected in the SS-7 sample (RL of $0.78 \mu\text{g}/\text{m}^3$). It is therefore concluded that the IA MTCA screening level exceedance for 1,2,4-TMB is likely attributable to an indoor source.

The concentration of 1,4-DCB at IA-8 ($2.0 \mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL ($1.1 \mu\text{g}/\text{m}^3$), and was detected at lower concentrations in the SS sample ($0.035 \mu\text{g}/\text{m}^3$) and the OA sample ($0.038 \mu\text{g}/\text{m}^3$). It is therefore concluded that the IA USEPA RSL exceedance for 1,4-DCB is likely attributable to an indoor source.

IA concentrations of BZ (up to $0.76 \mu\text{g}/\text{m}^3$) and CT (up to $0.48 \mu\text{g}/\text{m}^3$) exceeded IA MTCA screening levels ($0.32 \mu\text{g}/\text{m}^3$ for BZ and $0.42 \mu\text{g}/\text{m}^3$ for CT), and were similar to OA concentrations ($0.76 \mu\text{g}/\text{m}^3$ for BZ and $0.47 \mu\text{g}/\text{m}^3$ for CT). BZ was not detected in the SS-7 sample (RL of $0.12 \mu\text{g}/\text{m}^3$), and CT was detected in the SS-7 sample at a lower concentration ($0.14 \mu\text{g}/\text{m}^3$) than the IA and OA samples. It is therefore concluded that IA MTCA screening level exceedances for BZ and CT are likely attributable to an outdoor source.

IA concentrations of chloroform (up to $0.26 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.11 \mu\text{g}/\text{m}^3$), and were slightly higher than the SS concentration ($0.15 \mu\text{g}/\text{m}^3$). Chloroform was detected in the OA sample at a lower concentration ($0.095 \mu\text{g}/\text{m}^3$) than the IA and SS samples. It is therefore concluded that IA MTCA screening level exceedances for chloroform are likely attributable to an indoor source.

The IA concentration of TCE at IA-7 ($3.9 \mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL ($3 \mu\text{g}/\text{m}^3$) and MTCA screening levels (0.61 and $0.91 \mu\text{g}/\text{m}^3$ [carcinogenic and non-carcinogenic respectively]). The SS-7 concentration ($10 \mu\text{g}/\text{m}^3$) was 2.5 times higher than the IA-7 concentration and exceeded SS MTCA screening levels (6.1 and $9.1 \mu\text{g}/\text{m}^3$). TCE was detected in the OA sample at a lower concentration ($0.024 \mu\text{g}/\text{m}^3$) than the IA and SS samples. It is therefore concluded that IA USEPA RSL and MTCA screening level exceedances for TCE are likely attributable to a sub-slab source. The IA-7 TCE concentration ($3.9 \mu\text{g}/\text{m}^3$) was below the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$.

In summary, it is concluded that IA screening level exceedances for 1,2,4-TMB, 1,4-DCB, and chloroform are likely attributable to an indoor source. No specific obvious indoor sources were noted in the building; however, painting, carpeting, and new ceramic tile floors were installed in the last 2 years. IA screening level exceedances for BZ and CT are likely attributable to an outdoor source. The IA screening level exceedance for TCE

(3.9 µg/m³) is likely attributable to a sub-slab source and the concentration was below the short-term criterion of 8.4 µg/m³.

Round Two

Analytical results are presented in Table 4 and detected parameters summarized on Figure 3.

IA concentrations of 1,2,4-TMB, 1,4-DCB, BZ, EB, and TCE exceeded IA screening levels.

The IA concentration of 1,2,4-TMB at IA-7 (16 µg/m³) and IA-28 (10 µg/m³) exceeded an IA MTCA screening level (3.2 µg/m³). 1,2,4-TMB was detected in the OA sample at a lower concentration (0.71 µg/m³), and was not detected in the SS sample. It is therefore concluded that the IA MTCA screening level exceedance for 1,2,4-TMB is likely attributable to an indoor source as was determined by the round one results.

The concentration of 1,4-DCB at IA-7 (1.3 µg/m³) and IA-8 (58 µg/m³) exceeded an IA USEPA RSL (1.1 µg/m³), and was detected at lower concentrations in the SS sample (0.063 µg/m³) and the OA sample (0.61 µg/m³). It is therefore concluded that the IA USEPA RSL exceedance for 1,4-DCB is likely attributable to an indoor source as was determined by the round one results.

The IA concentration of EB at IA-8 (6.9 µg/m³) exceeded the IA EPA RSL (4.9 µg/m³), and was slightly greater than the OA concentration (4.8 µg/m³). EB was detected in the SS-7 sample at a lower concentration (0.12 µg/m³) than the IA and OA samples and below the screening levels. Subtracting the OA concentration from the IA concentrations results in a range of adjusted IA concentrations of -0.8 to 2.1 µg/m³, which are below the EPA RSLs. It is therefore concluded that the IA EPA RSL exceedance for EB is likely attributable to an outdoor source with a potentially contribution from an indoor source. The expected contribution from the SS is expected to be insignificant because the SS concentration is below the screening levels and below the acceptable indoor air level.

IA concentrations of BZ (up to 0.65 µg/m³) exceeded IA MTCA screening levels (0.32 µg/m³), and were similar to OA concentration (0.48 µg/m³). BZ was detected in the SS-7 sample at a lower concentration (0.16 µg/m³) than the IA and OA samples. It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an outdoor source as was determined by the round one results with possible contribution from an indoor source.

The IA concentration of TCE at IA-7 (3.1 µg/m³) exceeded an IA USEPA RSL (3 µg/m³) and MTCA screening levels (0.61 and 0.91 µg/m³ [carcinogenic and non-carcinogenic respectively]). The SS-7 concentration (14 µg/m³) was 4.5 times higher than the IA-7 concentration and exceeded SS MTCA screening levels (6.1 and 9.1 µg/m³). TCE was not detected in the OA. It is therefore concluded that IA USEPA RSL and MTCA screening level exceedances for TCE are likely attributable to a sub-slab source as was determined by the round one results. The IA-7 TCE concentration (3.1 µg/m³) was below the short-term criterion of 8.4 µg/m³.

In summary, the round two sampling is consistent with the conclusion discussed above for 1,2,4-TMB, 1,4-DCB, BZ, and TCE. The 1,2,4-TMB and 1,4-DCB are likely attributable to an indoor source which may be attributable to the recent construction activities. As with round one, BZ was again measured at levels exceeding screening criteria in the ambient air sample. Therefore the IA screening level exceedances for BZ is likely attributable to an outdoor source with possible contribution from an indoor source. The IA screening level exceedance for TCE (3.1 µg/m³) is likely attributable to a sub-slab source and the concentration was below the short-term criterion of 8.4 µg/m³.

Round One and Round Two Comparison

The following table presents a side-by-side comparison of the round one and round two sub-slab vapor data.

<i>Volatile Organic Compounds</i>		<i>Round One</i>	<i>Round Two</i>
		SS-7	SS-7
1,1,1-Trichloroethane	µg/m ³	1.2	1.6
1,1,2,2-Tetrachloroethane	µg/m ³	0.039 U	0.037 J
1,1,2-Trichloroethane	µg/m ³	0.16 U	0.15 U
1,1-Dichloroethene	µg/m ³	0.012 J	0.019 J
1,2,4-Trichlorobenzene	µg/m ³	0.039 U	0.039 U
1,2,4-Trimethylbenzene	µg/m ³	0.78 U	0.77 U
1,3,5-Trimethylbenzene	µg/m ³	0.78 U	0.77 U
1,4-Dichlorobenzene	µg/m ³	0.035 J	0.063
Benzene	µg/m ³	0.12 U	0.16
Carbon tetrachloride	µg/m ³	0.14	0.14
Chloroform (Trichloromethane)	µg/m ³	0.15 J	0.37
cis-1,2-Dichloroethene	µg/m ³	0.039 U	0.039 U
Ethylbenzene	µg/m ³	0.043 J	0.12 J
Hexachlorobutadiene	µg/m ³	0.026 J	0.039 U

		<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		<i>SS-7</i>	<i>SS-7</i>
m&p-Xylenes	µg/m ³	0.13 J	0.34
Methylene chloride	µg/m ³	0.78 U	0.37
Naphthalene	µg/m ³	0.087 J	0.33
o-Xylene	µg/m ³	0.035 J	0.17
Styrene	µg/m ³	0.78 U	0.30 J
Tetrachloroethene	µg/m ³	12	15
Toluene	µg/m ³	0.26 J	0.34
trans-1,2-Dichloroethene	µg/m ³	0.039 U	0.020 J
Trichloroethene	µg/m ³	10	14
Vinyl chloride	µg/m ³	0.039 U	0.0051 J

At SS-7, the reported concentrations for the round two sample are similar to the reported concentrations for the round one sample. Variability for the parameters detected above 1 ppbv includes slight increases in concentrations in round two for 1,1,1-TCA, PCE and TCE. These data suggest limited variability of concentrations over time. The parameters that were not detected in both rounds of sampling include 1,1,2-TCA, 1,2,4-TCB, 1,2,4-TMB, 1,3,5-TMB, and cis-1,2-DCE.

The following table presents a side-by-side comparison of the round one (Summa canister) and round two (passive sampler) indoor air data.

		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		<i>IA-7</i>	<i>IA-7</i>	<i>IA-8</i>	<i>IA-8</i>
1,1,1-Trichloroethane	µg/m ³	0.032 J	0.050 U	0.030 J	0.050 U
1,2,4-Trimethylbenzene	µg/m ³	4.7	16	1	1.8
1,4-Dichlorobenzene	µg/m ³	0.14 J	1.3	2	58 J
Benzene	µg/m ³	0.71	0.65	0.76	0.64
Ethylbenzene	µg/m ³	1.0	4.1	1.4	6.9
m&p-Xylenes	µg/m ³	2.9	16	4.3	29
o-Xylene	µg/m ³	1.1	5.6	1.8	9.5
Styrene	µg/m ³	0.35 J	1.9	0.51 J	1.2
Tetrachloroethene	µg/m ³	4.1	6.9	0.66	0.79
Toluene	µg/m ³	2.6	3.9	3.9	3.1
Trichloroethene	µg/m ³	3.9	3.1	0.45	0.30

At IA-7, the reported concentrations for the round two sample are similar to or greater than the reported concentrations for the round one sample. This is also the case for the

samples collected at IA-8. The Summa canisters were deployed over a 24-hour period and the passive samplers were deployed over a 7-day period on a different date. These data suggest some variability of concentrations over time. This is inconsistent with the comparison of SS samples that indicate limited variability. The greater variability in the IA samples may be a result of variations in emissions from other potential sources unrelated to the OCC site.

Additional Analysis of the Data

The sub-slab concentrations may be contributing to indoor air concentrations via the vapor intrusion pathway. However, the contributions would not be significant for the parameters that were detected in sub-slab samples at concentrations below the cancer screening values and below adjusted HQs, and in some cases below indoor air concentrations. This is the case for all parameters except TCE.

The following is a discussion of the most recent, shallowest, and nearby groundwater data presented in Table 4 with respect to SS analytical results. TCE was not detected in a recent (2012) shallow groundwater sample collected from location 34-25R, representing the most recent, shallowest, and nearby groundwater data. Other parameters that were detected in sub-slab air samples but were not detected in groundwater include 1,1,2,2-PCA, BZ, CT, chloroform, EB, m&p-xylenes, o-xylene, PCE, and toluene. Parameters detected in the sub-slab air samples and groundwater sample include 1,1-DCE, MC, trans-1,2-DCE, and VC. The remaining detected parameters in sub-slab air samples were not detected or not reported for the groundwater sample.

Recommendation

It is recommended that this building be scheduled for mitigation by GSH in response to concentrations of TCE in both SS and IA based on the data presented herein.

3.3 BUILDING 407

Figure 4 shows the sample locations and layout of Building 407.

Building Properties and Usage

Building 407 consists of a large metal sided and metal frame warehouse approximately 450 ft by 240 ft in size, with an attached wing to the south that is 150 ft by 100 ft in size. The warehouse areas have an asphalt floor. The asphalt thickness was measured at two

locations and ranged from 6.6 to 8.7 inches. Although the asphalt condition varied across the property, in general it appeared to be in fair condition. Currently the building is occupied by four tenants including GR Silicates, Trident Seafoods, Citadel Marine, and TOTE Truck Wash.

There is a second structure attached to the east side of Building 407. The structure is approximately 60 ft by 50 ft and is a metal sided and metal frame building. This portion of the building is constructed on a concrete slab. The southeastern part of this 60-ft by 50-ft east wing is a 14-ft by 15-ft office area, and 18-ft by 20-ft break area. Ceilings are 8-ft length plywood sheathing. The concrete slab in the office area is in good condition and the thickness was measured during probe installation at 5.75 inches thick. Heat is provided by electric baseboard. Vapors could potentially intrude into this building through cracks in the floor slab, unsealed utility penetrations, and un-caulked floor/wall or expansion joints.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

Three SS vapor probes were installed where concurrent SS/IA samples were collected, as discussed below. One IA sample was collected to assess potential indoor sources of VOCs.

Sample pair SS/IA-6 was located in the southwestern corner of the building within the space occupied by Trident. This space is used for the dry storage of fishing vessel machinery. No small office spaces were observed in this section of the building. In general, activities in this area are limited to the moving in and out of stored supplies as needed by the fishing fleet. The SS probe was installed through the asphalt floor in a location easily accessible, but outside most equipment traffic. Materials observed in storage included fishing vessel equipment, a diesel generator, electric forklifts, and pallet jacks. No obvious chemical storage was observed during the pre-sampling survey. According to Trident representatives, the area is generally used for storage of out of service machinery, and activities are generally limited to moving machinery in and out of the building. Heavy equipment including flatbed trucks and forklifts are occasionally operated in the building. Repairs and maintenance are completed at another facility. Based on these observations and input from Trident representatives, no obvious potential VOC emitters were identified in this area.

Sample pair SS/IA-9 was situated in a centrally located area within a vacant section of Building 407. This area is open to the area occupied by Trident to the east separated by a

chain link fence. The SS probe was installed in the middle of the vacant space in the asphalt floor. The IA sample was collected at this same location. No obvious potential VOC emitters were observed in this area.

Sample pair SS/IA-10 was located within a vacant office structure on the east end of Building 407. During the pre-sampling survey, the vacant office appeared to be used for the storage of office furniture. A small bottle of cleaner was identified and moved outside of the building. The vacant office space shares a wall and open doorway with a shop and storage area to the west operated by Nano Silicates. This shop and storage area was identified to be a potential source of VOC emissions as described in the next paragraph.

IA-20 was added to the investigation within the Nano Silicates shop area to assess potential indoor sources of VOCs from chemical storage and use at this location. This area shares a wall with sample location SS/IA-9 and an open corridor and doorway with sample location SS/IA-10. During the pre-sampling survey, miscellaneous power and hand tools, parts washing tubs, chemical storage tanks, three flammable material storage lockers, paint cans, cleaning products, and miscellaneous building materials were observed. It was determined these materials could not be isolated or removed from the building so IA-20 was located in this area to characterize potential VOC contributions from this area and potential impact on sampling locations SS/IA-9 and SS/IA-10.

Sampling in Building 407 was initiated on April 18, 2013 with the 24-hour samples collected the following day. An associated OA sample for this building (OA-9) was collected outside of the building near the southwestern corner. Weather conditions were a mix of sun and rain, with winds from the south. Precipitation measured during the previous 24-hour period was less than 0.42 inches.

Round Two

Discussions with the USEPA and POT during the June 11, 2013 conference call resulted in the decision to exclude Building 407 from the round two sampling event.

Round Three

Comments received from USEPA regarding the sampling results of rounds one and two resulted in the decision to include Building 407 in the round three sampling event. Three new sampling locations were added to Building 407 as requested by USEPA. A total of 12 Summa canister samples were collected during round three including four SS locations paired with four IA locations (one new SS probe at an existing IA location and three existing pairs), three IA locations (one existing but adjusted location and two new),

and one OA location. Additionally, two passive samples were collected, one from IA location 6 (IA-6P) and one from OA location 6 (OA-6P), as specified by USEPA.

Sample pair SS/IA-37 was added to the west of the Trident facility in an empty warehouse space rented by Citadel Marine. This area was previously considered outside the study area; however, at the request of USEPA a sampling pair was added to measure potential contributions from neighboring site activities as well as provide a greater representation of sub-slab vapor conditions. No obvious potential VOC emitters were observed in this area; however, adjacent to this space to the west, separated by a wall, Citadel Marine operates a painting bay.

Sample IA-38 was added to identify potential VOC sources associated with boat painting activities in the Citadel Marine painting bay. During the round three sampling of Building 407, painting was noted in this space. During the building inventory and survey, the following target analytes were identified: xylene, 1,2,4-TMB, toluene, EB, naphthalene, BZ, PCE, and TCE. Miscellaneous chemical storage within the small maintenance area south of sample location IA-38 was observed.

During the round three building survey, five sprinkler closets were identified and investigated. The five closets are generally small enclosed areas of wood construction. Each closet houses the watermain and control valves for the building's fire suppression system. One of the five closets was observed to have an unsealed void surrounding the watermain where it penetrated the floor. This closet was located in the GR Silicates portion of the building (Figure 4). Sample IA-39 was added to this closet to assess this potential preferential pathway for the migration of sub-slab VOC to enter the building.

Sample pair SS/IA-6 is unchanged from round one. No changes to the building space or types of material stored were observed between the round one and round three sampling.

Sample pair SS/IA-9 is unchanged from round one. No obvious potential VOC emitters were observed in this area. The space shares a wall with the truck washing facility to the north.

Sample pair SS/IA-10 is unchanged from round one. During the pre-sampling survey, the vacant office was cleared of all previously stored office furniture. Previously this space shared an open doorway with a shop and storage area to the west. The doorway has been boarded up. This shop and storage area was previously identified to be a potential source of VOC emissions as described in the next paragraph.

IA-20 was previously added to the investigation within the GR Silicates (formerly Nano Silicates) shop area to assess potential indoor sources of VOCs from chemical storage and use at this location. This area shares a wall with sample location SS/IA-9 and an open corridor and doorway with sample location SS/IA-10. During the pre-sampling survey for round three, the small storage space was cleared out and vacant and all of the materials appear to have been relocated to the main warehouse shop space occupied by then Nano Silicates now GR Silicates. The materials stored in the shop space are miscellaneous power and hand tools, three flammable material storage lockers, cleaning products, and miscellaneous building materials. It was determined these materials could not be isolated or removed from the building so IA-20 was located in this larger shop area to characterize potential VOC contributions from this area and potential impact on sampling locations SS/IA-9 and SS/IA-10. During the building inventory and survey, the following target analytes were identified: xylene, 1,2,4-TMB, toluene, EB, naphthalene, BZ, PCE, and TCE. Miscellaneous chemical storage within the small maintenance area south of sample location 20 was observed.

The indoor and ambient air sampling was initiated on March 12, 2014 using passive sampling equipment at IA-6P and OA-6P. The samples were retrieved 7 days later. Summa canister SS and IA sampling in Building 407 was initiated on March 18, 2014, with the 2-hour samples completed the same day and 24-hour samples completed the following day. An associated OA Summa canister sample for this building (OA-6) was collected outside of the building near the southwestern corner. Weather conditions were a mix of sun and rain, with winds from the west. No precipitation was measured on March 18 with 0.07 inches measured the following day.

Sampling Results

Round One

Analytical results are presented in Table 5 and detected parameters summarized on Figure 4.

IA concentrations of 1,2,4-TMB, BZ, CT, chloroform, and naphthalene exceeded IA screening levels.

IA concentrations of 1,2,4-TMB (up to 56 $\mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL (31 $\mu\text{g}/\text{m}^3$) and MTCA screening level (3.2 $\mu\text{g}/\text{m}^3$), and were significantly higher than SS (up to 0.68 J $\mu\text{g}/\text{m}^3$) and OA (0.65 J $\mu\text{g}/\text{m}^3$) concentrations. It is therefore concluded that IA USEPA RSL and MTCA screening level exceedances for 1,2,4-TMB are likely attributable to an indoor source.

IA concentrations of BZ (up to 0.99 $\mu\text{g}/\text{m}^3$) and CT (up to 0.46 $\mu\text{g}/\text{m}^3$) exceeded IA MTCA screening levels (0.32 $\mu\text{g}/\text{m}^3$ for BZ and 0.42 $\mu\text{g}/\text{m}^3$ for CT), were similar to OA concentrations (0.40 $\mu\text{g}/\text{m}^3$ for BZ and 0.45 $\mu\text{g}/\text{m}^3$ for CT), and were higher than SS concentrations [ND (0.11) $\mu\text{g}/\text{m}^3$ for BZ and up to 0.34 $\mu\text{g}/\text{m}^3$ for CT). It is therefore concluded that IA MTCA screening level exceedances for BZ and CT are likely attributable to an outdoor source.

The IA concentration of chloroform at IA-10 (0.12 J $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.11 $\mu\text{g}/\text{m}^3$) and was higher than in the paired SS-10 sample (0.11 J $\mu\text{g}/\text{m}^3$) and the OA concentration (0.075 J $\mu\text{g}/\text{m}^3$). It is therefore concluded that the IA MTCA screening level exceedance for chloroform is likely attributable to an indoor source.

The IA concentration of naphthalene at IA-10 (0.54 $\mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL (0.36 $\mu\text{g}/\text{m}^3$), and was higher than in the paired SS-10 sample (0.059 J $\mu\text{g}/\text{m}^3$) and the OA concentration (0.047 J $\mu\text{g}/\text{m}^3$). It is therefore concluded that the IA USEPA RSL exceedance for naphthalene is likely attributable to an indoor source, possibly the operation of vehicles within this space.

The SS concentration of HCBd at SS-9 (1.7 $\mu\text{g}/\text{m}^3$) exceeded a SS MTCA screening level (1.1 $\mu\text{g}/\text{m}^3$); however, it was not detected in IA or OA samples (the RLs for HCBd in IA and OA samples were below the screening levels). It is therefore concluded that SS concentrations of HCBd are being adequately attenuated.

In summary, it is concluded that IA screening level exceedances for 1,2,4-TMB, chloroform, and naphthalene are likely attributable to an indoor source (miscellaneous power and hand tools, parts washing tubs, chemical storage tanks, three flammable material storage lockers, paint cans, cleaning products, and miscellaneous building materials were observed). IA screening level exceedances for BZ and CT are likely attributable to an outdoor source. SS concentrations of HCBd are being adequately attenuated.

Round three

Analytical results are presented in Table 4 and detected parameters summarized on Figure 4.

IA concentrations of 1,2,4-TMB, BZ, CT, EB, naphthalene, o-xylene, and styrene exceeded IA screening levels.

IA concentrations of 1,2,4-TMB (up to 730 $\mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL (31 $\mu\text{g}/\text{m}^3$) in four of the seven samples and MTCA screening level (3.2 $\mu\text{g}/\text{m}^3$) in all seven samples collected. The 1,2,4-TMB concentrations at SS-6, SS-9, and SS-10 were all below 1.0 $\mu\text{g}/\text{m}^3$ and the screening criteria. The concentration detected at SS-37 was 32 $\mu\text{g}/\text{m}^3$, below the SS screening criteria. The lowest IA concentration of 7.0 $\mu\text{g}/\text{m}^3$ was recorded at the paired location IA-37. OA concentrations up to 6.0 $\mu\text{g}/\text{m}^3$ were similar to the IA-37 concentrations. A potential indoor source for 1,2,4-TMB was identified in the Citadel Marine paint bay on the west side of the building. A separate IA sample (IA-38) was collected from within in the paint bay. On the day sampling was to be completed, the tenant was conducting painting operations. A pervasive odor was detectable throughout Building 407. Concentrations of 1,2,4-TMB are greatest in IA-38 and decrease in concentration at each sample the more distant the location from IA-38. It is therefore concluded that IA USEPA RSL and MTCA screening level exceedances for 1,2,4-TMB are likely attributable to an indoor source related to the painting in the Citadel Marine paint bay.

IA concentrations of BZ (up to 1.3 $\mu\text{g}/\text{m}^3$) exceeded the IA MTCA screening level (0.32 $\mu\text{g}/\text{m}^3$). The concentration of BZ measured in the OA sample was 0.68 $\mu\text{g}/\text{m}^3$. SS concentrations of BZ ranged from 0.11 to 0.43 $\mu\text{g}/\text{m}^3$ and are less than the screening criteria and the concentrations in the collected IA and OA samples. As noted above, BZ was identified in products stored and used within the building. It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to indoor and outdoor sources.

IA concentrations of CT (up to 0.47 $\mu\text{g}/\text{m}^3$) marginally exceed the IA MTCA screening level (0.42 $\mu\text{g}/\text{m}^3$), are equal to or lower than the OA sample concentration (0.47 $\mu\text{g}/\text{m}^3$), and were higher than SS concentrations (up to 0.32 $\mu\text{g}/\text{m}^3$), which are below screening criteria. It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source.

IA concentrations of EB (up to 36 $\mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL (4.9 $\mu\text{g}/\text{m}^3$) in five of the seven samples and are higher than the OA sample (1.1 $\mu\text{g}/\text{m}^3$) and the SS concentrations (up to 1.3 $\mu\text{g}/\text{m}^3$), which are below screening criteria. Concentrations of EB are greatest in IA-38 (Citadel Marine paint bay) and decrease in concentration at each sample the more distant the location from IA-38. It is therefore concluded that the IA USEPA RSL screening level exceedances for EB are likely attributable to an indoor source related to the painting in the Citadel Marine paint bay.

IA concentrations of naphthalene (up to 19 µg/m³) exceeded an IA USEPA RSL (0.36 µg/m³) in five of the seven samples, an IA USEPA RSL (13 µg/m³) in one sample, and MTCA screening level (1.4 µg/m³) in three samples collected. The concentration of naphthalene measured in the OA sample was 0.19 µg/m³. SS concentrations of naphthalene ranged from 0.066 to 2.4 µg/m³ and are less than the screening criteria. Concentrations of naphthalene are greatest in IA-38 (Citadel Marine paint bay) and decrease in concentration at each sample the more distant the location from IA-38. It is therefore concluded that the IA USEPA RSLs and MTCA screening level exceedance for naphthalene is likely attributable to an indoor source related to the painting in the Citadel Marine paint bay.

IA concentrations of o-xylene (90 µg/m³) and styrene (1,400 µg/m³) exceeded IA MTCA screening levels (46 µg/m³ for xylene and 457 µg/m³ for styrene) at IA-38 (Citadel Marine paint bay). Concentrations of o-xylene and styrene measured in the OA sample were 1.5 µg/m³ and 1.9 µg/m³, respectively. There were no exceedances of screening criteria in the SS samples. It is therefore concluded that the MTCA screening level exceedances for o-xylene and styrene are likely attributable to an indoor source related to the painting in the Citadel Marine paint bay.

The analytical results for the passive samples were similar to the Summa canisters collected at the same location for both IA and OA with the exception of 1,2,4-TMB. The concentrations measured in the passive samples were one order of magnitude lower than the Summa canister samples.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected Volatile Organic Compounds</i>		<i>IA-6</i>	<i>IA-9</i>	<i>IA-10</i>	<i>IA-20</i>	<i>IA-37</i>	<i>IA-38</i>	<i>IA-39</i>
		<i>- OA-9</i>	<i>- OA-9</i>	<i>- OA-9</i>	<i>- OA-9</i>	<i>- OA-9</i>	<i>- OA-9</i>	<i>- OA-9</i>
1,1,1-Trichloroethane	µg/m ³	0.00	0.00	0.00	0.00	0.00	0.12	0.00
1,1,2,2-Tetrachloroethane	µg/m ³	0.00	0.00	0.00	0.00	0.00	0.10	0.00
1,1,2-Trichloroethane	µg/m ³	-0.03	-0.03	-0.02	-0.01	-0.02	0.40	-0.01
1,1-Dichloroethene	µg/m ³	-0.01	-0.01	0.00	0.00	0.00	0.10	0.00
1,2,4-Trichlorobenzene	µg/m ³	-0.01	-0.01	0.00	0.00	0.00	0.10	0.00
1,2,4-Trimethylbenzene	µg/m ³	80.90	64.90	4.30	6.90	334.90	724.90	1.90
1,3,5-Trimethylbenzene	µg/m ³	26.30	18.30	0.80	1.70	118.30	338.30	0.70
1,4-Dichlorobenzene	µg/m ³	-0.01	-0.01	0.01	0.01	-0.01	0.11	-0.02
Benzene	µg/m ³	0.34	0.44	0.64	0.64	0.54	0.64	0.29

Carbon tetrachloride	µg/m ³	-0.01	0.00	-0.01	0.00	-0.01	-0.30	-0.08
Chloroform (Trichloromethane)	µg/m ³	-0.04	-0.04	-0.04	-0.03	-0.04	-0.04	-0.04
cis-1,2-Dichloroethene	µg/m ³	-0.05	-0.05	-0.04	-0.02	-0.05	0.08	-0.04
Ethylbenzene	µg/m ³	5.10	11.00	4.30	2.00	20.00	35.00	1.90
Hexachlorobutadiene	µg/m ³	-0.01	-0.01	0.00	0.00	0.00	0.10	0.00
m&p-Xylenes	µg/m ³	15.50	37.50	14.50	6.30	67.50	146.50	7.50
Methylene chloride	µg/m ³	-0.05	0.04	0.11	-0.04	0.01	0.19	0.01
Naphthalene	µg/m ³	0.43	0.81	0.21	1.57	3.67	18.87	0.11
o-Xylene	µg/m ³	8.20	18.70	4.20	2.40	42.70	88.70	2.20
Styrene	µg/m ³	18.30	29.30	-0.10	1.50	218.30	1398.30	-0.10
Tetrachloroethene	µg/m ³	-0.18	-0.24	-0.10	-0.10	-0.23	-0.07	-0.22
Toluene	µg/m ³	1.40	1.50	2.80	2.60	4.50	14.10	1.50
trans-1,2-Dichloroethene	µg/m ³	-0.01	-0.01	0.00	0.00	0.00	0.10	0.00
Trichloroethene	µg/m ³	-0.71	-0.73	-0.66	-0.66	-0.74	-0.72	-0.73
Vinyl chloride	µg/m ³	-0.03	-0.01	0.01	-0.03	-0.03	0.10	-0.02

As shown in the above table, the adjusted IA concentrations for CT are zero or less than zero and do not exceed screening criteria. There are no exceedances at locations IA-39 that was added to a utility closet with an unsealed penetration to assess a potential preferential pathway for the migration of sub-slab VOC to enter the building. The adjusted exceedances include 1,2,4-TMB, BZ, EB, naphthalene, o-xylene, and styrene. As noted previously, the measured concentrations were attributed to the Citadel Marine paint bay operations (sample location IA-38), except BZ that was attributed to identified products stored and used within the building.

In summary, it is concluded that IA screening level exceedances for 1,2,4-TMB, EB, naphthalene, o-xylene, and styrene are attributable to an indoor source associated with activities in the Citadel Marine paint bay. IA screening level exceedances for BZ are likely attributable to an indoor and outdoor source, and for CT are attributed to an outdoor source.

Round One and Round Three Comparison

The following table presents a side-by-side comparison of the round one and round three sub-slab vapor data.

		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
<i>Volatile Organic Compounds</i>		SS-6	SS-6	SS-9	SS-9	SS-10	SS-10
1,1,1-Trichloroethane	µg/m ³	0.35	0.32	0.88	0.79	0.030 J	0.030 J

		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
<i>Volatile Organic Compounds</i>		SS-6	SS-6	SS-9	SS-9	SS-10	SS-10
1,1,2,2-Tetrachloroethane	µg/m ³	0.036 U	0.034 U	0.036 U	0.037 U	0.037 U	0.039 U
1,1,2-Trichloroethane	µg/m ³	0.14 U	0.14 U	0.14 U	0.15 U	0.15 U	0.16 U
1,1-Dichloroethene	µg/m ³	0.0067 J	0.034 U	0.0074 J	0.037 U	0.037 U	0.039 U
1,2,4-Trichlorobenzene	µg/m ³	0.036 U	0.034 U	0.036 U	0.037 U	0.037 U	0.039 U
1,2,4-Trimethylbenzene	µg/m ³	0.31 J	0.64	0.68 J	0.33	0.74 U	0.049 J
1,3,5-Trimethylbenzene	µg/m ³	0.71 U	0.20	0.71 U	0.12 J	0.74 U	0.016 J
1,4-Dichlorobenzene	µg/m ³	0.036 U	0.013 J	0.018 J	0.033 J	0.037 U	0.024 J
Benzene	µg/m ³	0.11 U	0.11	0.11 U	0.32	0.11 U	0.11 J
Carbon tetrachloride	µg/m ³	0.14 J	0.15	0.25	0.27	0.34	0.32
Chloroform (Trichloromethane)	µg/m ³	0.011 J	0.0095 J	0.028 J	0.034 J	0.11 J	0.047 J
cis-1,2-Dichloroethene	µg/m ³	0.036 U	0.034 U	0.036 U	0.037 U	0.037 U	0.039 U
Ethylbenzene	µg/m ³	0.044 J	0.080 J	0.057 J	0.068 J	0.043 J	0.081 J
Hexachlorobutadiene	µg/m ³	0.34	0.034 U	1.7	0.037 U	0.26	0.039 U
m&p-Xylenes	µg/m ³	0.15	0.16	0.21	0.25	0.14 J	0.23
Methylene chloride	µg/m ³	0.71 U	0.14 U	0.71 U	0.15 U	0.74 U	0.24
Naphthalene	µg/m ³	0.077 J	0.11 J	1.2	0.26	0.059 J	0.066 J
o-Xylene	µg/m ³	0.068 J	0.084 J	0.097 J	0.11 J	0.079 J	0.093 J
Styrene	µg/m ³	1.0	0.13 J	0.62 J	0.53	0.74 U	0.078 J
Tetrachloroethene	µg/m ³	63	57	2.8	0.69	0.53	0.49
Toluene	µg/m ³	0.44 J	0.14 U	0.33 J	0.19	0.20	0.42
trans-1,2-Dichloroethene	µg/m ³	0.036 U	0.034 U	0.036 U	0.037 U	0.037 U	0.039 U
Trichloroethene	µg/m ³	0.31	0.10	0.15	0.022 J	0.14	0.080
Vinyl chloride	µg/m ³	0.036 U	0.034 U	0.036 U	0.037 U	0.037 U	0.039 U

The reported concentrations for the round three samples are similar to the reported concentrations for the round one samples, with the notable exceptions of HCBD, naphthalene, and PCE at SS-9. The round three concentrations of these parameters are an order of magnitude lower for naphthalene and PCE, and not detected for HCBD. The exceedance of screening criteria noted for HCBD in round one was not confirmed in round three. Variability for other parameters detected above 1 ppbv includes slight decreases in concentrations in round three for PCE at SS-6. These data suggest limited variability in concentrations over time and limited temporal effects with a few exceptions. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,1,2-TCA, 1,2,4-TCB, cis-1,2-DCE, trans-1,2-DCE, and VC.

The following table presents a side-by-side comparison of the round one and round three indoor air summa canister data.

		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
<i>Volatile Organic Compounds</i>		<i>IA-6</i>	<i>IA-6</i>	<i>IA-9</i>	<i>IA-9</i>	<i>IA-10</i>	<i>IA-10</i>	<i>IA-20</i>	<i>IA-20A</i>
1,1,1-Trichloroethane	µg/m ³	0.025 J	0.023 J	0.027 J	0.022 J	0.027 J	0.021 J	0.026 J	0.021 J
1,1,2,2-Tetrachloroethane	µg/m ³	0.036 U	0.035 U	0.037 U	0.035 U	0.042 U	0.037 U	0.035 U	0.041 U
1,1,2-Trichloroethane	µg/m ³	0.15 U	0.14 U	0.15 U	0.14 U	0.17 U	0.15 U	0.011 J	0.16 U
1,1-Dichloroethene	µg/m ³	0.036 U	0.035 U	0.037 U	0.035 U	0.042 U	0.037 U	0.0049 J	0.041 U
1,2,4-Trichlorobenzene	µg/m ³	0.036 U	0.035 U	0.037 U	0.035 U	0.042 U	0.037 U	0.035 U	0.041 U
1,2,4-Trimethylbenzene	µg/m ³	53	86	56	70	6.0	9.4	16	12
1,3,5-Trimethylbenzene	µg/m ³	17	28	17	20	1.9	2.5	4.7	3.4
1,4-Dichlorobenzene	µg/m ³	0.036 U	0.026 J	0.022 J	0.021 J	0.026 J	0.047	0.032 J	0.046
Benzene	µg/m ³	0.60	1.0	0.95	1.1	0.82	1.3	0.99	1.3
Carbon tetrachloride	µg/m ³	0.35	0.46	0.46	0.47	0.46	0.46	0.45	0.47
Chloroform (Trichloromethane)	µg/m ³	0.11 J	0.085 J	0.15 U	0.082 J	0.12 J ^f	0.082 J	0.11 J	0.090 J
cis-1,2-Dichloroethene	µg/m ³	0.036 U	0.012 J	0.037 U	0.010 J	0.042 U	0.022 J	0.016 J	0.040 J
Ethylbenzene	µg/m ³	3.0	6.1	3.4	12	1.3	5.3	4.3	3.0
Hexachlorobutadiene	µg/m ³	0.036 U	0.035 U	0.037 U	0.035 U	0.042 U	0.037 U	0.035 U	0.041 U
m&p-Xylenes	µg/m ³	13	19	15	41	5.4	18	18	9.8
Methylene chloride	µg/m ³	0.73 U	0.33	0.74 U	0.42	0.84 U	0.49	0.71 UJ	0.34
Naphthalene	µg/m ³	0.17	0.56	0.24	0.94	0.54	0.34	0.31	1.7
o-Xylene	µg/m ³	7.6	9.5	7.8	20	2.0	5.5	6.1	3.7
Styrene	µg/m ³	88	20	83	31	6.1	1.6	18	3.2
Tetrachloroethene	µg/m ³	0.062	0.24	0.24	0.18	0.12	0.32	0.15	0.32
Toluene	µg/m ³	8.3	3.3	8.2	3.4	6.3	4.7	13	4.5
trans-1,2-Dichloroethene	µg/m ³	0.036 U	0.035 U	0.037 U	0.035 U	0.042 U	0.037 U	0.024 J	0.041 U
Trichloroethene	µg/m ³	0.040	0.087	0.052	0.066	0.047	0.14	0.085	0.14
Vinyl chloride	µg/m ³	0.036 U	0.011 J	0.037 U	0.035 U	0.042 U	0.049	0.0036 J	0.012 J

There is significant variability for parameters detected above 1 ppbv including increases in concentrations for a majority of parameters and a few decreases in concentrations for the round three data. There is similar variability between the OA samples. This variability is inconsistent with the generally consistent results for SS samples between sampling rounds. The observed variability of the IA and OA results is indicative of variable indoor sources. As discussed previously, indoor sources have been identified and outdoor VOC concentrations have been measured at all OA sample locations.

Additional Analysis of the Data

The sub-slab concentrations may be contributing to indoor air concentrations via the vapor intrusion pathway. However, the contributions would not be significant for the parameters that were detected in sub-slab samples at concentrations below the cancer screening values and below HQs (See Response to General Comment 6 regarding Building 407) and in some cases below indoor air concentrations. This is the case for all the parameters discussed except HCBD. In the case of HCBD, this parameter was not detected in any of the indoor air samples nor was it detected in any of the samples collected during the subsequent round three sampling event.

The following is a discussion of the most recent, shallowest, and nearby groundwater data presented in Table 5 with respect to SS analytical results. HCBD was not reported in samples collected from locations 85C-25 and 91C-25, representing the most recent, shallowest, and nearby groundwater data. Parameters that were detected in sub-slab air samples but were not detected in groundwater include 1,1-DCE, CT, PCE, and TCE. Parameters detected in the sub-slab air samples and groundwater sample include chloroform, EB, m&p-xylenes, o-xylene, and toluene. The remaining detected parameters in sub-slab air samples were not detected or not reported for the groundwater sample.

The following discusses a comparison of the analytical results to non-cancer screening levels for chronic exposures at values that represent a hazard quotient of 0.1 (adjusted HQ) except for TCE for purposes of evaluating short-term exposures to women of reproductive age. RLs are above the EPA RSL adjusted HQ for 1,1,2-TCA for indoor air. The RLs for 1,1,2-TCA are less than 20 percent of the EPA RSL HQ and would not contribute to a cumulative HI since the results are non-detect. Concentrations exceed the EPA RSL adjusted HQ for 1,2,4-TMB for indoor air. The exceedances for 1,2,4-TMB has been concluded to be attributed to an indoor source since the sub-slab concentrations are lower and do not exceed the adjusted HQ. This parameter has a primary target organ of blood system. There are no exceedances of EPA RSL adjusted HQs for sub-slab results. Since no detected concentrations exceed the EPA RSL adjusted HQs, cumulative non-cancer health effects would be less than a HI of 1. Concentrations exceed the MTCA adjusted HQs for 1,2,4-TMB, naphthalene, o-xylene, and styrene for indoor air. The exceedances are likely attributable to an indoor source since the sub-slab concentrations are lower and do not exceed the adjusted HQs. The parameters 1,2,4-TMB and styrene have a different primary target organ (blood system) than naphthalene and o-xylene (body weight). One concentration of PCE exceeds the MTCA adjusted HQ for sub-slab. The MTCA adjusted HQ for indoor air was not exceeded for this parameter. This parameter has a different primary target organ (central nervous

system) than the exceedances noted for indoor air. The exceedance is less than 35 percent of the MTCA HQ and would not contribute to a cumulative primary target organ HI greater than 1. The above discussion is applicable to the round three data since the round three results are similar to the round one results as discussed above.

Recommendation

No further action by GSH is proposed for this building due to the identified indoor sources and apparent outdoor source unrelated to the OCC Site based on the data presented herein.

3.4 BUILDING 532

Figure 5 shows the sample locations and layout of Building 532.

Building Properties and Usage

Building 532 consists of multi tenant workshop/work areas of approximately 400 ft by 150 ft in size. The interior space is configured for use by four tenants. The current occupying tenants include WIC, SafeBoats, and POT.

The northwestern section of the building is occupied by WIC and is used as a covered workshop with large hanger style doors open to adjacent tents where sand blasting and painting activities are conducted. WIC has two small office areas, with one used as a break room. Office space for the WIC operation is set up in adjacent job trailers to the north of the main building. The eastern section of the building is occupied by SafeBoats. This section of the building includes a small office located in the extreme northeastern corner of the building, a centrally located break room, and three small offices along the inside (northern) wall. The SafeBoats offices are occupied for a full 8-hour shift. The POT maintains a lunchroom in the extreme southwestern area of the building. All of these offices and lunchrooms are of concrete block construction. Ceilings are typically 8 ft in height.

The SafeBoats facility has radiant heaters and fans in the shop areas and electric wall heaters in the office spaces. Electric baseboards are used to heat the POT lunchroom and vacant offices. Vapors could potentially intrude into this building through cracks in the floor slab, unsealed utility penetrations, and un-caulked floor/wall or expansion joints.

The concrete slab ranged in thickness from 5.25 to 6 inches during probe installation within the northeast office area, and the centrally located break room. Drilling was advanced to a depth of approximately 12 inches to confirm the absence of asphalt below the concrete. The third vapor probe was drilled through the asphalt shop floor in the southwest corner of the SafeBoats facility. Probe installation in the asphalt shop floor in the southwest corner of the building determined an asphalt thickness of 10.5 inches.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

Three SS vapor probes were installed within the SafeBoats occupied eastern half of this building where concurrent SS/IA samples were collected, as discussed below.

Sample pair SS/IA-11 was located in the northeast corner of the building within a small enclosed office space. The floor of the office is a concrete slab. The slab appeared to be set within and not on top of the surrounding asphalt floor. The office area is segregated from a small storage area with a work bench and an office area with a single desk. A door separates these areas but is generally left open. The SS probe was installed in the storage area to limit interruptions to tenant activities during sampling. The IA sample was collected in this area as well, and adjacent to the desk in the office area. During the pre-sampling survey, the small storage room and work bench adjacent to the office was observed to contain some aerosol paint cans and lubricants. It was requested of SafeBoats staff that these materials be removed to a location outside of the office. These materials were removed prior to the sampling event, and the room was cleared of all potential VOC emitters.

Sample pair SS/IA-12 was placed in a centrally located area within the SafeBoats facility in a small enclosed break room. The break room has a concrete floor set into the asphalt floor surrounding it. The break room opens onto the manufacturing floor from two doors on either side of the room. During the pre-sampling survey, the break room was not observed to contain any potential VOC emitters. During sampling activities, the doors were allowed to be opened and closed as normal to represent normal use and conditions.

Sample pair SS/IA-13 was located in the southwest corner of the SafeBoats facility within the main manufacturing area. Initially, the probe was planned to be advanced along the eastern wall but complications with utility clearance and tenant activities required the sample be moved approximately 20 ft west of the eastern wall. The sample location is directly adjacent to a small workstation. This workstation is generally used

during an 8-hour shift, 5 days per week. The entire shop area is interconnected and large hanger style doors are located on three sides. Aerosol cans containing chemical cleaners, lubricants, and paints were observed at various work stations in the manufacturing area. Pallets of diesel fuel stored in 55-gallon drums were stored along the eastern wall. The diesel fuel is used in portable heaters. During the building walk, the heaters were not in operation. On the day of the pre-sampling survey, workers were completing interior painting on a boat stored in the shop area. A strong paint odor was detected at the south end of the building. It was noted that a series of air ducts and fans were venting air from the boat and exhausting out of the building through a door at the south end of the building.

Activities within the manufacturing area included aluminum welding, grinding, small painting projects, electrical wiring, and upholstery work. Isolation or removal of these activities was not practical; however, the sampling event was scheduled around activities to minimize potential VOC emission sources. Information provided by SafeBoats indicated that two of the most actively maintained and renovated boats would be moved out of the facility within a week. At that time, activity within the manufacturing area would be greatly reduced with the majority of operations taking place on the north side of the building, or on the opposite end of the building from sample location SS/IA-13. During sample collection, activity levels within the building were minimal, and no painting projects were observed.

The SafeBoats facility shares a large portion of its western wall with WIC. The WIC facility completes large scale sand blasting and painting activities. All of the sand blasting and painting are conducted within tents each supplied with fresh air circulated through large truck mounted filter packs. Untreated air is not permitted from escaping the tented area. A discussion with a WIC representative confirmed that, during the scheduled sampling on April 19, 2013, no painting operations were scheduled.

Sampling in Building 532 was initiated on April 19, 2013 with the 24-hour samples collected the following day. An associated OA sample (OA-11 and field duplicate sample FD-11) were collected at a location immediately south of Building 532. Weather conditions during the sampling event were a mix of rain and sun, with winds from the southwest. Precipitation noted during the preceding 24-hour period was less than 0.15 inches.

On April 20, 2013, the IA sample canister set up at location SS/IA-11 experienced an operation error causing a lack of complete IA sample. This error required the location to be re-sampled. Location SS/IA-11 was re-sampled on April 25, 2013. Weather conditions on April 25, 2013 were partly cloudy, with winds from the east, and no

precipitation was observed. An associated OA sample (OA-11) was collected along the eastern wall of Building 532 near the northeastern corner.

Round Two

Indoor air and sub-slab vapor samples were collected at the same IA/SS sample locations as the round one event. Two additional IA samples (IA-23 and IS-27) were collected from within a break room adjacent to the west of the main SafeBoats manufacturing floor and a centrally located office space within the building in accordance with USEPA request, respectively. Prior to conducting the round two sampling event, a detailed survey was completed for Building 532, at which time the tenant was asked to fill out a questionnaire and provide MSDSs for all chemicals used or stored within the building. During the building inventory and survey, the following target analytes were identified: xylene, 1,2,4-TMB, toluene, EB, naphthalene, BZ, styrene, and TCE. Copies of the submitted building survey questionnaire and MSDSs are included in Appendix A.

The indoor and ambient air sampling was initiated on June 24, 2013 using passive sampling equipment. The samples were collected 7 days later. Sub-slab sampling was conducted on June 25 and 26, 2013 with the 2-hour samples completed the same day. An associated OA sample for this building (OA-11) was collected outside of the building.

Round Three

Building 532 is scheduled for mitigation as discussed below and was excluded from the round three sampling event.

Sampling Results

Round One

Analytical results are presented in Table 6 and detected parameters summarized on Figure 5.

IA concentrations of 1,4-DCB, BZ, CT, EB, and TCE exceeded IA screening levels.

IA concentrations of 1,4-DCB at IA-12 ($5.4 \mu\text{g}/\text{m}^3$) and IA-13 ($1.6 \mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL ($1.1 \mu\text{g}/\text{m}^3$), and were higher than SS (up to $0.13 \text{ J } \mu\text{g}/\text{m}^3$) or OA (up to $0.15 \text{ J } \mu\text{g}/\text{m}^3$) concentrations. It is therefore concluded that USEPA RSL exceedances for 1,4-DCB are likely attributable to an indoor source.

IA concentrations of BZ (up to 0.74 $\mu\text{g}/\text{m}^3$) and CT (up to 0.45 $\mu\text{g}/\text{m}^3$) exceeded IA MTCA screening levels (0.32 $\mu\text{g}/\text{m}^3$ for BZ and 0.42 $\mu\text{g}/\text{m}^3$ for CT), and were similar to OA concentrations (up to 0.49 $\mu\text{g}/\text{m}^3$ for BZ and up to 0.46 $\mu\text{g}/\text{m}^3$ for CT). BZ concentrations detected in the SS samples (up to 0.12 $\mu\text{g}/\text{m}^3$) were lower than those observed in IA and OA samples. Similar concentrations of CT were observed in the SS samples (0.66 $\mu\text{g}/\text{m}^3$) as measured in the IA and OA samples. It is therefore concluded that IA MTCA screening level exceedances for BZ and CT are likely attributable to an outdoor source.

The IA concentration of EB at IA-13 (5.1 $\mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL (4.9 $\mu\text{g}/\text{m}^3$), and was higher than SS (up to 0.34 $\mu\text{g}/\text{m}^3$) or OA (up to 0.96 $\mu\text{g}/\text{m}^3$) concentrations. It is therefore concluded that the IA USEPA RSL exceedance for EB is likely attributable to an indoor source.

The IA concentration of TCE at IA-13 (0.86 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.61 $\mu\text{g}/\text{m}^3$) and was higher than OA concentrations (up to 0.085 $\mu\text{g}/\text{m}^3$). The paired SS-13 concentration (24 $\mu\text{g}/\text{m}^3$) was 28 times higher than the IA-13 concentration and exceeded SS MTCA screening levels (6.1 and 9.1 $\mu\text{g}/\text{m}^3$). It is therefore concluded that the IA MTCA screening level exceedance for TCE is likely attributable to a sub-slab source. The IA-13 TCE concentration (0.86 $\mu\text{g}/\text{m}^3$) was below the short-term criterion of 8.4 $\mu\text{g}/\text{m}^3$.

In summary, it is concluded that IA screening level exceedances for 1,4-DCB and EB are likely attributable to an indoor source (aerosol cans containing chemical cleaners, lubricants, paints, and diesel fuel were observed). IA screening level exceedances for BZ and CT are likely attributable to an outdoor source. The IA screening level exceedance for TCE (0.86 $\mu\text{g}/\text{m}^3$) is likely attributable to a sub-slab source and the concentration was below the short-term criterion of 8.4 $\mu\text{g}/\text{m}^3$.

Round Two

Analytical results are presented in Table 6 and detected parameters summarized on Figure 5.

IA concentrations of 1,4-DCB, BZ, and EB, exceeded IA screening levels.

IA concentrations of 1,4-DCB was detected at IA-12 (2.2 $\mu\text{g}/\text{m}^3$), IA-13 (2.2 $\mu\text{g}/\text{m}^3$) IA-23 (87 $\mu\text{g}/\text{m}^3$), and IA-27 (26 $\mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL (1.1 $\mu\text{g}/\text{m}^3$), and were higher than SS (up to 0.12 $\mu\text{g}/\text{m}^3$) or OA (up to 0.05 $\mu\text{g}/\text{m}^3$) concentrations. It is

therefore concluded that USEPA RSL exceedances for 1,4-DCB are likely attributable to an indoor source.

IA concentrations of BZ were detected at IA-11 (0.64 $\mu\text{g}/\text{m}^3$), IA-12 (0.61 $\mu\text{g}/\text{m}^3$), IA-13 (0.86 $\mu\text{g}/\text{m}^3$), IA-23 (1.2 $\mu\text{g}/\text{m}^3$), and IA-27 (0.78 $\mu\text{g}/\text{m}^3$) exceeded IA MTCA screening levels (0.32 $\mu\text{g}/\text{m}^3$ for BZ). OA concentrations of BZ were (0.58 $\mu\text{g}/\text{m}^3$), similar to the IA concentrations. BZ concentrations detected in the SS samples were below (0.13 $\mu\text{g}/\text{m}^3$) and were lower than those observed in IA and OA samples. It is therefore concluded that IA MTCA screening level exceedances for BZ and CT are likely attributable to an indoor source and/or outdoor source.

The IA concentrations of EB at IA-11 (14 $\mu\text{g}/\text{m}^3$), IA-12 (22 J $\mu\text{g}/\text{m}^3$), IA-13 (27 J $\mu\text{g}/\text{m}^3$), IA-23 (30 J $\mu\text{g}/\text{m}^3$), and IA-27 (26 J $\mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL (4.9 $\mu\text{g}/\text{m}^3$), and were higher than SS (up to 0.13 J $\mu\text{g}/\text{m}^3$) or OA (16 J $\mu\text{g}/\text{m}^3$) (except IA-11) concentrations. It is therefore concluded that the IA USEPA RSL exceedance for EB is likely attributable to an indoor source.

An IA concentration at IA-13 for TCE did not exceed the IA MTCA screening level, which was not the case in round one. However, the paired SS-13 concentration (27 $\mu\text{g}/\text{m}^3$) is similar to the round one result and exceeded SS MTCA screening levels (6.1 and 9.1 $\mu\text{g}/\text{m}^3$). It should be noted that large hanger style doors were often observed partially open that would have potentially increased building ventilation and explain why there was no exceedance at IA-13 for the round two sample. It is therefore concluded that the IA-13 result for TCE is likely attributable to a sub-slab source.

In summary, the round two sampling is consistent with the conclusion discussed above for 1,4-DCB, BZ, EB, and TCE. The 1,4-DCB, BZ, and EB are likely attributable to a combination of potential outdoor and indoor sources (aerosol cans containing chemical cleaners, lubricants, paints, and diesel fuel were observed). The IA-13 result for TCE (0.076 $\mu\text{g}/\text{m}^3$) is likely attributable to a sub-slab source and the concentration was below the short-term criterion of 8.4 $\mu\text{g}/\text{m}^3$.

Round One and Round Two Comparison

The following table presents a side-by-side comparison of the round one and round two sub-slab vapor data.

		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		SS-11	SS-11	SS-12	SS-12	SS-13	SS-13
1,1,1-Trichloroethane	µg/m ³	0.50	0.66	4.2	4.3	24	23
1,1,2,2-Tetrachloroethane	µg/m ³	0.039 U	0.038 U	0.041 U	0.035 U	0.043 U	0.036 U
1,1,2-Trichloroethane	µg/m ³	0.15 U	0.15 U	0.16 U	0.14 U	0.17 U	0.15 U
1,1-Dichloroethene	µg/m ³	0.039 U	0.028 J	0.058	0.057	0.31	0.29
1,2,4-Trichlorobenzene	µg/m ³	0.039 U	0.058	0.041 U	0.062	0.043 U	0.036 U
1,2,4-Trimethylbenzene	µg/m ³	0.77 U	0.76 U	0.82 U	0.69 U	0.86 U	0.73 U
1,3,5-Trimethylbenzene	µg/m ³	0.77 U	0.76 U	0.82 U	0.69 U	0.86 U	0.73 U
1,4-Dichlorobenzene	µg/m ³	0.039 U	0.10	0.13 J	0.12	0.046	0.066
Benzene	µg/m ³	0.12 U	0.13	0.12	0.10 J	0.13 U	0.10 J
Carbon tetrachloride	µg/m ³	0.66	0.79	0.16	0.10	0.064	0.062
Chloroform (Trichloromethane)	µg/m ³	0.049 J	0.15 J	0.070 J	0.12 J	0.045 J	0.059 J
cis-1,2-Dichloroethene	µg/m ³	0.039 U	0.060	0.041 U	0.051	0.043 U	0.036 U
Ethylbenzene	µg/m ³	0.027 J	0.13 J	0.34 J	0.12 J	0.078 J	0.11 J
Hexachlorobutadiene	µg/m ³	0.039 U	0.038 U	0.89	0.020 J	0.022 J	0.036 U
m&p-Xylenes	µg/m ³	0.087 J	0.42	1.4	0.33	0.33	0.43
Methylene chloride	µg/m ³	0.77 U	0.13 J	0.82 U	0.17	0.86 UJ	0.035 J
Naphthalene	µg/m ³	0.15 U	0.31	0.092 J	0.18	0.85	0.30
o-Xylene	µg/m ³	0.030 J	0.25	0.40 J	0.18	0.087 J	0.28
Styrene	µg/m ³	0.77 U	0.43 J	0.82 U	0.69 U	0.86 U	0.73 U
Tetrachloroethene	µg/m ³	3.2	5.0	27	30	20	27
Toluene	µg/m ³	1.2	0.33	5.0	0.17	1.2	0.17
trans-1,2-Dichloroethene	µg/m ³	0.039 U	0.063	0.041 U	0.053	0.043 U	0.036 U
Trichloroethene	µg/m ³	0.27	0.45	0.37	0.30	24	27
Vinyl chloride	µg/m ³	0.039 U	0.018 J	0.041 U	0.017 J	0.043 U	0.036 U

At SS-11, SS-12, and SS-13, the reported concentrations for the round two samples are similar to the reported concentrations for the round one samples. Variability for the parameters detected above one ppbv includes slight increases in concentrations in round two for PCE and TCE, and decreases in round two for toluene. These data suggest limited variability of concentrations over time. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,1,2-TCA, 1,2,4-TMB, and 1,3,5-TMB.

The following table presents a side-by-side comparison of the round one (Summa canister) and round two (passive sampler) indoor air data.

		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		<i>IA-11</i>	<i>IA-11</i>	<i>IA-12</i>	<i>IA-12</i>	<i>IA-13</i>	<i>IA-13</i>
1,1,1-Trichloroethane	µg/m ³	0.024 J	0.050 U	0.032 J	0.050 U	0.034 J	0.050 U
1,2,4-Trimethylbenzene	µg/m ³	0.60 J	1.9	1.3	1.6	1.1	1.6
1,4-Dichlorobenzene	µg/m ³	0.13 J	0.69	5.4	2.2	1.6	2.2
Benzene	µg/m ³	0.63	0.64	0.71	0.61	0.74	0.86
Ethylbenzene	µg/m ³	1.7	14	4.7	22 J	5.1	27 J
m&p-Xylenes	µg/m ³	6.9	61 J	20	89 J	22	100 J
o-Xylene	µg/m ³	2.3	21 J	5.0	32 J	5.6	40 J
Styrene	µg/m ³	0.34 J	2.0	0.32 J	0.93	0.28 J	1.2
Tetrachloroethene	µg/m ³	0.18	0.37	1.5	0.24	1.8	0.19
Toluene	µg/m ³	21	28 J	55	8.4	59	19 J
Trichloroethene	µg/m ³	0.10	0.12	0.34	0.049	0.86	0.076

At IA-11, the reported concentrations for the round two sample are greater than the reported concentrations for the round one sample with some exceptions that have similar concentrations (i.e., 1,1,1-TCA, 1,2,4-TMB, 1,4-DCB, BZ, PCE, TCE). At IA-12 and IA-13, the reported concentrations for the round two samples are similar for 1,1,1-TCA, 1,2,4-TMB, 1,4-DCB, BZ, and styrene, greater than for EB and xylenes, and less than for PCE, toluene, and TCE with respect to the reported concentrations for the round one samples. The Summa canisters were deployed over a 24-hour period and the passive samplers were deployed over a 7-day period on a different date. These data suggest some variability of concentrations over time. This is inconsistent with the comparison of SS samples that indicate limited variability. The greater variability in the IA samples may be a result of variations in emissions from other potential sources unrelated to the OCC site.

Additional Analysis of the Data

The sub-slab concentrations may be contributing to indoor air concentrations via the vapor intrusion pathway. However, the contributions would not be significant for the parameters that were detected in sub-slab samples at concentrations below the cancer screening values and below HQs, and in some cases below indoor air concentrations. This is the case for all parameters except TCE. The recommendation for this building is mitigation by GSH in response to concentrations of TCE in both the sub-slab and indoor air.

The following is a discussion of the most recent, shallowest, and nearby groundwater data presented in Table 6 with respect to SS analytical results. TCE was detected in a

recent (2012) shallow groundwater sample collected from location 61C-25, representing the most recent, shallowest, and nearby groundwater data. CT was detected in sub-slab air samples but was not detected in groundwater. Other parameters detected in the sub-slab air samples and groundwater sample include 1,1-DCE, BZ, chloroform, cis-1,2-DCE, EB, m&p-xylenes, MC, o-xylene, PCE, toluene, trans-1,2-DCE, and VC. The remaining detected parameters in sub-slab air samples were not reported for the groundwater sample.

Recommendation

It is recommended that this building be scheduled for mitigation by GSH in response to concentrations of TCE in SS in rounds one and two and the IA in round one.

3.5 BUILDING 592

Figure 6 shows the sample locations and layout of Building 592.

Building Properties and Usage

Building 592 houses Trident's offices and warehouse. Construction is steel siding over wood frame construction on concrete slab. The concrete slab is in good condition. This 260-ft by 150-ft building has two separate office areas along the east wall of the first floor, with the majority of the first floor used as warehouse space. The interior walls of the offices are wood framed. There are offices on the partial second floor, which covers about two thirds of the building footprint. The two main floor office areas occupy an area about 220 ft by 45 ft along the east wall, with the northernmost office estimated to be 60 ft by 45 ft with 8-ft drop ceilings. The southernmost office is approximately 160 ft by 45 ft in size with an 8-ft high drywall ceiling. There is a 40-ft space between the offices. Vapors could potentially intrude into this building through cracks in the floor slab, unsealed utility penetrations, and un-caulked floor/wall or expansion joints. The slab thickness encountered during the probe installation was between 6 and 6.5 inches. Where visible, the slab appeared to be in good condition.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

Two SS vapor probes were installed where concurrent SS/IA samples were collected, as discussed below.

Sample pair SS/IA-1 was located in a small office space in the northeast corner of the building. Specifically, the sample probe was installed just outside the main office space in a cubicle area to limit impacts to tenant operations. A second office space extends to the west of this sample location and is separated by a door. Adjacent to the south of the office is a small storage area that opens to a larger warehouse area to the west. Further to the south is another office space. No obvious chemical storage was observed in this area. A warehouse space is located within this same building; however, the contents of the warehouse were not directly inspected.

Sample pair SS/IA-2 was located in an office space approximately 40 ft south of sample location SS/IA-1. The two offices are separated by a storage area opened to the adjacent warehouse and shop space to the west. South of this sample location is a shop and warehouse space separated by a door. This office has its own exterior door. During the pre-sampling survey, three plastic gasoline cans were observed. The cans were empty and it was not clear whether these cans were used. In any case, the cans were moved out of the office area to a nearby shop space for storage. During the sampling event, the cans were not observed to be in the area. No additional obvious VOC emitters were identified in this location. This office and break room space shares a wall with a storage area and warehouse space. The warehouse space was not directly inspected.

Sampling in Building 592 was initiated on April 21, 2013 with the 24-hour samples collected the following day. An associated OA sample (OA-1) was collected at a location just to the west of Building 592. Weather conditions during the sampling event were partly cloudy and calm, with winds from the west southwest. No precipitation was observed.

Round Two

Indoor air and sub-slab vapor samples were collected at the same IA/SS sample locations as the round one event. Two additional IA samples (IA-24 and IS-25) were collected from a centrally located position within the building in accordance with USEPA request and at the far south end of the building in an area used as a machine shop with several large lathes and other metal working tools, respectively. Prior to conducting the round two sampling event, a detailed survey was completed for Building 592, at which time the tenant was asked to fill out a questionnaire and provide MSDSs for all chemicals used or stored within the building. During the building inventory and survey, the following target analytes were identified: xylene, 1,2,4-TMB, toluene, EB, naphthalene, BZ, PCE, and TCE. Miscellaneous chemical storage within the small maintenance area south of sample location 2 was observed. Numerous gas cans

were observed and the operation of forklift and golf carts within the warehouse were noted. Various cutting oils and lubricants were observed in the machine shop area as well as bins of waste metal shaving. Copies of the submitted building survey questionnaire and MSDSs are included in Appendix A.

The indoor and ambient air sampling was initiated on June 24, 2013 using passive sampling equipment. The samples were collected 7 days later. Sub-slab sampling was conducted on June 27 and 29, 2013 with the 2-hour samples completed the same day. An associated OA sample for this building (OA-1) was collected outside of the building.

Round Three

A total of 13 Summa canister samples were collected during round three including at four SS locations paired with four IA locations (one new SS probe at an existing IA location and three existing pairs), four IA locations (one existing near a potential source area and three new), and one OA location. Additionally, two passive samples were collected, one from IA location 2 (IA-2P) and one from OA location 1 (OA-1P), as specified by USEPA.

Sample location IA-24 was previously sampled in round two to represent the center of the building space. A new SS probe (SS-24) was paired with it for round three.

A preliminary building and sampling survey was conducted on February 7, 2014 to investigate potential preferential pathways specifically targeting utility penetrations. Mechanical, electrical, and plumbing are routed through numerous locations in the warehouse. The observed floor penetrations all appeared sealed and in good condition. Numerous cracks in the floor were observed throughout the building. Some of the larger cracks have been sealed. The date of the floor sealing is unknown. Four sprinkler closets were observed in the building. The closets are wood construction and surround the watermain and control valves associated with the building's fire suppression system. A cut surrounding the watermain entering the floor was observed to be unsealed with the existing floor. During a pre-sampling site walk with USEPA representatives conducted on March 10, 2014 these sprinkler closets were investigated and two closets were selected as additional indoor air sampling points (IA-33 and IA-34).

The SS/IA-32 was added to a small shop area near the southeastern corner of the building. This area is used for the maintenance of fish processing equipment. A parts washing tub, sand blasting station, and welding station are all housed in this area. During the pre-sampling survey, no obvious VOC emitters were observed in this space; however, previous work activities likely exposed this area to chemicals noted in the

MSDS review. Consistent with round one during the building inventory and survey, the following target analytes were identified in MSDSs as being used in the building: xylene, 1,2,4-TMB, toluene, EB, naphthalene, BZ, PCE, and TCE.

During the pre-sampling site walk on March 10, 2014, USEPA representatives requested an additional indoor air sample be collected within a small office space located along the eastern wall of the building, just north and outside of a shop area. The office space was previously excluded from the sampling program since it is built on a raised wooden floor. IA-40B was added to this location. The first summa canister (IA-40) deployed in this location began filling at a rate greater than designed and was closed, a second canister, IA-40B, was deployed. No obvious VOC emitters were observed in this area.

Sample pair SS/IA-1 is unchanged from round one. No obvious potential VOC emitters were observed in this area.

Sample pair SS/IA-2 is unchanged from round one. No obvious potential VOC emitters were observed in this area. The space shares a wall with the warehouse and maintenance area to the south.

The indoor and ambient air sampling was initiated on March 11, 2014 using passive sampling equipment at IA-2P and OA-1P. The samples were retrieved 7 days later. Summa canister SS and IA sampling was initiated on March 17 with the 2-hour samples completed the same day and 24-hour samples were completed the following day. An associated Summa canister OA sample for this building (OA-1) was collected outside of the building on the west side.

Sampling Results

Round One

Analytical results are presented in Table 7 and detected parameters summarized on Figure 6.

IA concentrations of BZ, CT, naphthalene, and TCE exceeded IA screening levels.

IA concentrations of BZ (up to $1.5 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.32 \mu\text{g}/\text{m}^3$), and were higher than the OA concentration ($0.46 \mu\text{g}/\text{m}^3$) and SS concentrations (up to $0.20 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an indoor source with possible contributions from outdoor sources.

IA concentrations of CT (up to 0.47 µg/m³) exceeded an IA MTCA screening level (0.42 µg/m³), were lower than the OA concentration (0.50 µg/m³), and higher than SS concentrations (up to 0.36 µg/m³). It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source.

The IA concentration of naphthalene at IA-1 (0.53 µg/m³) exceeded an IA USEPA RSL (0.36 µg/m³), and was higher than in the paired SS-1 sample (0.031 µg/m³) and the OA concentration (0.11 µg/m³). It is therefore concluded that the IA USEPA RSL exceedance for naphthalene is likely attributable to an indoor source.

The IA concentrations of TCE at IA-1 (7.3 µg/m³) and IA-2 (13 µg/m³) exceeded IA USEPA RSLs (3 and 8.8 µg/m³) and MTCA screening levels (0.61 and 0.91 µg/m³), and were higher than in the SS samples (up to 4.5 µg/m³) and the OA sample (0.38 µg/m³). SS concentrations of TCE are below the SS screening levels. It is therefore concluded that the IA USEPA RSL and MTCA screening level exceedances for TCE at IA-1 and IA-2 are likely attributable to an indoor source. The TCE concentration at IA-2 (13 µg/m³) exceeded the short-term criterion of 8.4 µg/m³.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-1</i>	<i>IA-2</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>
1,1,1-Trichloroethane	µg/m ³	0.084	0.074
1,1-Dichloroethene	µg/m ³	0.007	
1,2,4-Trimethylbenzene	µg/m ³	1.82	1.02
1,3,5-Trimethylbenzene	µg/m ³	0.59	0.48
1,4-Dichlorobenzene	µg/m ³	0.028	-0.005
Benzene	µg/m ³	0.54 ^f	1.04 ^f
Carbon tetrachloride	µg/m ³	-0.03	-0.03
Chloroform (Trichloromethane)	µg/m ³	0.023	0.022
Ethylbenzene	µg/m ³	2.25	2.45
m&p-Xylenes	µg/m ³	8.33	8.63
Methylene chloride	µg/m ³	1.6	-
Naphthalene	µg/m ³	0.42 ^a	-0.043
o-Xylene	µg/m ³	2.69	2.69
Styrene	µg/m ³	0.36	0.26

<i>Detected</i>		<i>IA-1</i>	<i>IA-2</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>
Tetrachloroethene	µg/m ³	0.97	0.82
Toluene	µg/m ³	14.5	20.5
Trichloroethene	µg/m ³	6.92 ^{afg}	12.62 ^{abefg}

As shown in the above table, the adjusted IA exceedances include BZ, naphthalene, and TCE at various locations. As noted previously, BZ was detected in one of two sub-slab vapor samples at a concentration less than screening levels and additionally less than adjusted IA concentrations by more than half. BZ was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of BZ in IA are unlikely attributable to sub-slab vapor. Naphthalene was detected in two of two sub-slab vapor samples at a concentrations less than screening levels and additionally less than adjusted IA concentrations by up to an order of magnitude, therefore it may be concluded that the exceedance of naphthalene in IA is unlikely attributable to sub-slab vapor. TCE was detected in two of two sub-slab vapor samples at concentrations less than screening levels and additionally less than adjusted IA concentrations by up to an order of magnitude. TCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of TCE in IA are unlikely attributable to sub-slab vapor. As noted previously, all the above chemicals were identified on MSDSs provided by the operator confirming the presence of these chemicals within the building. It should be noted that the adjusted IA concentrations for CT are negative, meaning the IA concentrations are less than the OA concentration.

In summary, it is concluded that IA screening level exceedances for BZ are likely attributable to an indoor source and possibly outdoor source. IA screening level exceedances for CT are likely attributable to an outdoor source. IA screening level exceedances for naphthalene and TCE are likely attributable to an indoor source (no specific obvious indoor sources were noted in the building; however, warehouse space was not directly inspected). The TCE concentration at IA-2 (13 µg/m³) exceeded the short-term criterion of 8.4 µg/m³.

Round Two

Analytical results are presented in Table 7 and detected parameters summarized on Figure 6.

IA concentrations of BZ, EB, 1,2,4-TMB, and TCE exceeded IA screening levels.

IA concentrations of BZ (up to 1.7 µg/m³) exceeded an IA MTCA screening level (0.32 µg/m³), and were higher than the OA concentration (0.6 µg/m³) and SS concentrations (up to 0.33 µg/m³). It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an indoor source with possible contributions from outdoor sources.

IA concentrations of EB (up to 6.8 µg/m³) exceeded an IA USEPA RSL screening level (4.9 µg/m³), and were higher than the OA concentration (0.5 µg/m³) and SS concentrations (up to 0.37 µg/m³). It is therefore concluded that IA USEPA RSL screening level exceedances for EB are likely attributable to an indoor source(s).

IA concentrations of 1,2,4-TMB (up to 5.3 µg/m³) exceeded an IA MTCA screening level (3.2 µg/m³), and were higher than the OA concentration (0.35 µg/m³) and SS concentrations (up to 0.38 µg/m³). It is therefore concluded that IA MTCA screening level exceedances for 1,2,4-TMB are likely attributable to an indoor source(s).

The IA concentrations of TCE (up to 1.9 µg/m³) exceeded IA MTCA screening levels (0.61 and 0.91 µg/m³), and were higher than in the SS samples (up to 0.4 µg/m³) and the OA sample (0.48 µg/m³). SS concentrations of TCE are below the SS screening levels. It is therefore concluded that the IA MTCA screening level exceedances for TCE are likely attributable to an indoor source(s). The TCE concentrations do not exceed the short-term criterion of 8.4 µg/m³.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-1</i>	<i>IA-2</i>	<i>IA-24</i>	<i>IA-25</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>
1,1,1-Trichloroethane	µg/m ³	0.053	0.068	-	-
1,2,4-Trimethylbenzene	µg/m ³	2.95	4.95 ^g	4.45 ^g	3.85 ^g
1,4-Dichlorobenzene	µg/m ³	-	0.086	0.074	0.07
Benzene	µg/m ³	1.0 ^f	1.1 ^f	0.07	0.05
Ethylbenzene	µg/m ³	4	6.3 ^a	4.5	4.3
m&p-Xylenes	µg/m ³	14.2	23.2	17.2	16.2
o-Xylene	µg/m ³	4.84	8.04	6.24	6.04
Styrene	µg/m ³	0.77	0.67	0.57	0.57
Tetrachloroethene	µg/m ³	1.03	1.33	1.03	1.83
Toluene	µg/m ³	19.6	27.6	8.6	27.6

<i>Detected</i>		<i>IA-1</i>	<i>IA-2</i>	<i>IA-24</i>	<i>IA-25</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>
Trichloroethene	µg/m ³	1.02 ^{fg}	1.42 ^{fg}	0.72 ^f	0.82 ^f

As shown in the above table, the adjusted IA exceedances include 1,2,4-TMB, BZ, EB, and TCE at various locations. As noted previously, 1,2,4-TMB was detected in one of two sub-slab vapor samples at a concentration less than screening levels and additionally less than adjusted IA concentrations by up to an order of magnitude, therefore it may be concluded that the exceedances of 1,2,4-TMB in IA are unlikely attributable to sub-slab vapor. BZ was detected in two of two sub-slab vapor samples at concentrations less than screening levels and additionally less than adjusted IA concentrations by up to an order of magnitude. BZ was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of BZ in IA are unlikely attributable to sub-slab vapor. EB was detected in two of two sub-slab vapor samples at concentrations less than screening levels and additionally less than adjusted IA concentrations by an order of magnitude. EB was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedance of EB in IA is unlikely attributable to sub-slab vapor. TCE was detected in two of two sub-slab vapor samples at concentrations less than screening levels and additionally less than adjusted IA concentrations by up to an order of magnitude. TCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of TCE in IA are unlikely attributable to sub-slab vapor. As noted previously, all the above chemicals were identified on MSDSs provided by the operator confirming the presence of these chemicals within the building.

In summary, it is concluded that IA screening level exceedances for BZ, EB and 1,2,4-TMB are likely attributable to an indoor source(s) and possibly outdoor sources for BZ. IA screening level exceedances for TCE are likely attributable to an indoor source. The maximum TCE concentration (1.9 µg/m³) was below the short-term criterion of 8.4 µg/m³. The building survey identified TCE in degreasers used in maintenance areas in Building 592.

Round Three

Analytical results are presented in Table 7 and detected parameters summarized on Figure 6.

IA concentrations of BZ, CT, chloroform, EB, naphthalene, PCE, and TCE exceeded IA screening levels.

IA concentrations of BZ (up to 1.1 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.32 $\mu\text{g}/\text{m}^3$), and were higher than the OA concentration (0.65 $\mu\text{g}/\text{m}^3$) and SS concentrations (up to 0.16 $\mu\text{g}/\text{m}^3$), which are below screening criteria. It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an indoor source with possible contributions from outdoor sources.

IA concentrations of CT (up to 0.47 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.42 $\mu\text{g}/\text{m}^3$), were similar to the OA concentration (0.46 $\mu\text{g}/\text{m}^3$), and higher than three of the four SS concentrations (0.21 J to 0.36 $\mu\text{g}/\text{m}^3$), which are below screening criteria. It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source.

IA concentrations of chloroform (up to 0.22 $\mu\text{g}/\text{m}^3$) marginally exceeded an IA MTCA screening level (0.11 $\mu\text{g}/\text{m}^3$), and were higher than the OA concentration (0.080 J $\mu\text{g}/\text{m}^3$) and three of the four SS concentrations (up to 0.12 $\mu\text{g}/\text{m}^3$), which are below screening criteria. It is therefore concluded that IA MTCA screening level exceedances for chloroform are likely attributable to an indoor source with possible contributions from outdoor sources.

IA concentrations of EB (up to 6.5 $\mu\text{g}/\text{m}^3$) marginally exceeded an IA USEPA RSL (4.9 $\mu\text{g}/\text{m}^3$), and were higher than the OA concentration (0.49 J $\mu\text{g}/\text{m}^3$) and the SS concentrations (up to 0.11 J $\mu\text{g}/\text{m}^3$), which are below screening criteria. It is therefore concluded that IA MTCA screening level exceedances for EB are likely attributable to an indoor source.

IA concentrations of naphthalene (up to 0.76 $\mu\text{g}/\text{m}^3$) marginally exceeded an IA USEPA RSL (0.36 $\mu\text{g}/\text{m}^3$), and were higher than the OA concentration (0.081 J $\mu\text{g}/\text{m}^3$) and the SS concentrations (up to 0.21 $\mu\text{g}/\text{m}^3$), which are below screening criteria. It is therefore concluded that IA MTCA screening level exceedances for naphthalene are likely attributable to an indoor source.

IA concentrations of PCE (up to 55 $\mu\text{g}/\text{m}^3$) exceeded a MTCA screening level (9.6 $\mu\text{g}/\text{m}^3$) in all eight samples, a MTCA screening level (18 $\mu\text{g}/\text{m}^3$) in seven of eight samples, and an IA USEPA RSL (47 $\mu\text{g}/\text{m}^3$) in two samples collected. The concentration of PCE measured in the OA sample was 0.41 $\mu\text{g}/\text{m}^3$. Three of the four SS concentrations of PCE ranged from 6.9 to 23 $\mu\text{g}/\text{m}^3$ and are less than the screening criteria. The fourth SS concentration associated with new location SS-32 in a small shop area at the south-east corner of the building was measured at 2,000 $\mu\text{g}/\text{m}^3$. The concentration of PCE in the paired IA sample was 17 $\mu\text{g}/\text{m}^3$, the lowest measured IA concentration. The highest IA concentrations were at locations IA-2 (office to the north-east) and IA-25 (near

potential source). IA-2 was paired with SS-2 having a concentration of 23 µg/m³ that is less than the IA concentration and below the screening criteria. The previous sampling rounds had no exceedances for PCE in SS, IA, and OA samples; however, the highest measured concentration was at location IA-25 (near potential source). The concentrations at the previously installed and sampled SS locations are generally consistent over the three rounds, which is inconsistent with the IA data. Therefore, It appears that screening level exceedances for PCE are likely attributable to an indoor source. Additionally, the data indicate that a potential isolated source exists beneath the shop area. The potential contribution to IA concentrations from location SS-32 is unclear.

IA concentrations of TCE (up to 8.3 µg/m³) exceeded a MTCA screening level (0.61 µg/m³) in six of eight samples, a MTCA screening level (0.91 µg/m³) in three of eight samples, and an IA USEPA RSL (3 µg/m³) in two samples collected. The IA concentrations were higher than TCE concentrations measured in the OA sample (0.25 µg/m³) and in three of the four SS samples (up to 0.30 µg/m³), which are below screening criteria. It is therefore concluded that the IA USEPA RSL and MTCA screening level exceedances for TCE are likely attributable to an indoor source. The TCE concentrations did not exceed the short-term criterion of 8.4 µg/m³.

The analytical results for the passive samples were generally lower than the Summa canister collected at the same location for IA and generally similar or greater than the Summa canister collected at the same location for OA.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-1</i>	<i>IA-2</i>	<i>IA-24</i>	<i>IA-25</i>	<i>IA-32</i>	<i>IA-33</i>	<i>IA-34</i>	<i>IA-40B</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>
1,1,1-Trichloroethane	µg/m ³	0.049	0.037	0.014	0.037	0.003	0.009	0.024	0.010
1,1,2,2-Tetrachloroethane	µg/m ³	0.001U	0.00U	-0.004U	-0.001U	0.00U	0.002	-0.005U	-0.002U
1,1,2-Trichloroethane	µg/m ³	0.00U	-0.01U	-0.02U	-0.01U	-0.01U	-0.01U	-0.03U	-0.01U
1,1-Dichloroethene	µg/m ³	0.001U	0.00U	-0.004U	-0.001U	0.00U	-0.002U	-0.005U	-0.002U
1,2,4-Trichlorobenzene	µg/m ³	0.001U	0.00U	-0.024	-0.001U	0.00U	-0.002U	-0.005U	-0.002U
1,2,4-Trimethylbenzene	µg/m ³	1.31	2.01	0.91	0.61	0.64	0.81	1.01	1.21
1,3,5-Trimethylbenzene	µg/m ³	0.455	0.675	0.305	0.225	0.235	0.295	0.335	0.425
1,4-Dichlorobenzene	µg/m ³	0.079	0.016	0.014	0.012	0.014	0.006	0.006	0.017
Benzene	µg/m ³	0.20	0.45 ^f	0.15	0.15	0.05	0.15	0.45 ^f	0.15

<i>Detected</i>		<i>IA-1</i>	<i>IA-2</i>	<i>IA-24</i>	<i>IA-25</i>	<i>IA-32</i>	<i>IA-33</i>	<i>IA-34</i>	<i>IA-40B</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>	<i>- OA-1</i>
Carbon tetrachloride	µg/m ³	-0.13	-0.01	-0.04	0.01	-0.06	-0.02	-0.03	-0.06
Chloroform (Trichloromethane)	µg/m ³	0.03	0.14 ^f	0.05	0.03	0.00	0.01	0.03	0.03
cis-1,2-Dichloroethene	µg/m ³	-0.06	-0.07	-0.05	0.00	-0.04	-0.04	0.00	-0.11
Ethylbenzene	µg/m ³	1.91	2.61	1.81	1.21	4.71	1.41	1.31	6.01 ^a
Hexachlorobutadiene	µg/m ³	0.001U	0.00U	-0.004U	-0.001U	0.00U	-0.002U	-0.005	-0.002U
m&p-Xylenes	µg/m ³	6.7	9.2	6.3	4.2	20.2	4.6	4.9	24.2
Methylene chloride	µg/m ³	0.34	0.37	0.33	1.76	0.09	0.37	0.56	0.33
Naphthalene	µg/m ³	0.309	0.399 ^a	0.229	0.679 ^a	0.199	0.309	0.159	0.229
o-Xylene	µg/m ³	2.11	3.01	1.91	1.41	5.71	1.41	1.61	7.11
Styrene	µg/m ³	0.258	0.168	0.168	0.278	0.898	0.148	0.128	0.408
Tetrachloroethene	µg/m ³	25.59 ^{fg}	54.59 ^{afg}	26.59 ^{fg}	54.59 ^{afg}	16.59 ^f	22.59 ^{fg}	37.59 ^{fg}	24.59 ^{fg}
Toluene	µg/m ³	6.1	9.3	4.9	4.9	2.9	6.0	4.9	7.5
trans-1,2-Dichloroethene	µg/m ³	0.008	0.015	0.024	0.010	-0.001	0.009	0.012	0.002
Trichloroethene	µg/m ³	2.75 ^{fg}	7.75 ^{afg}	-0.25	0.75 ^f	-0.25	-0.25	-0.25	-0.25
Vinyl chloride	µg/m ³	-0.11	-0.13	-0.09	-0.04	-0.13	-0.09	-0.02	-0.17

As shown in the above table, the exceedances for adjusted IA concentrations include BZ, chloroform, EB, naphthalene, PCE, and TCE at various locations. BZ, chloroform, and naphthalene were detected in all four SS vapor samples at concentrations less than screening levels and additionally generally less than adjusted IA concentrations. BZ and chloroform were not detected in the nearby groundwater sample and naphthalene was not analyzed. Therefore it may be concluded that the exceedances of BZ chloroform, and naphthalene in IA are unlikely attributable to sub-slab vapor. EB was detected in three of four sub-slab vapor samples at concentrations less than screening levels and additionally less than adjusted IA concentrations by more than an order of magnitude. EB was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedance of EB in IA is unlikely attributable to sub-slab vapor. PCE was detected in all four SS vapor samples at concentrations less than screening levels except at SS-32. As shown above, the lowest IA concentration is at the location paired with SS-32 and above the screening levels. As noted previously, PCE was not detected above screening levels in IA samples collected in rounds one and two, and the SS concentrations are consistent with the round three SS concentrations. PCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedance of PCE in IA is unlikely attributable to sub-slab vapor, except potentially at location SS-32. TCE was detected at all four sub-slab vapor samples at concentrations less than screening levels and additionally less than adjusted IA concentrations. TCE was not detected in the nearby groundwater sample. Therefore it may be concluded

that the exceedances of TCE in IA are unlikely attributable to sub-slab vapor. As noted previously, all the above chemicals were identified on MSDSs provided by the operator confirming the presence of these chemicals within the building.

In summary, it is concluded that IA screening level exceedances for BZ and chloroform are likely attributable to an indoor source(s) and possibly outdoor sources. IA screening level exceedances for CT are likely attributable to an outdoor source. IA screening level exceedances for EB, naphthalene, PCE, and TCE are likely attributable to an indoor source. Additionally, the data indicate that a potential isolated PCE source exists beneath the shop area. The potential contribution to IA PCE concentrations from location SS-32 is unclear.

Round One and Round Two Comparison

The following table presents a side-by-side comparison of the round one and round two sub-slab vapor data.

<i>Volatile Organic Compounds</i>		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
		<i>SS-1</i>	<i>SS-1</i>	<i>SS-2</i>	<i>SS-2</i>
1,1,1-Trichloroethane	µg/m ³	21	20	0.59	0.35
1,1,2,2-Tetrachloroethane	µg/m ³	0.038 U	0.038 U	0.037 U	0.040 U
1,1,2-Trichloroethane	µg/m ³	0.15 U	0.15 U	0.0075 J	0.16 U
1,1-Dichloroethene	µg/m ³	0.31	0.33	0.0068 J	0.0078 J
1,2,4-Trichlorobenzene	µg/m ³	0.038 U	0.038 U	0.037 U	0.040 U
1,2,4-Trimethylbenzene	µg/m ³	0.76 U	0.38 J	0.73 U	0.79 U
1,3,5-Trimethylbenzene	µg/m ³	0.76 U	0.76 U	0.73 U	0.79 U
1,4-Dichlorobenzene	µg/m ³	0.038 U	0.13	0.033 J	0.040 U
Benzene	µg/m ³	0.20	0.33	0.11 U	0.069 J
Carbon tetrachloride	µg/m ³	0.25	0.29	0.36	0.31
Chloroform (Trichloromethane)	µg/m ³	0.52	0.43	0.046 J	0.070 J
cis-1,2-Dichloroethene	µg/m ³	0.038 U	0.018 J	0.018 J	0.040 U
Ethylbenzene	µg/m ³	0.11 J	0.22	0.060 J	0.37
Hexachlorobutadiene	µg/m ³	0.038 U	0.038 U	0.026 J	0.040 U
m&p-Xylenes	µg/m ³	0.38	0.91	0.20	1.5
Methylene chloride	µg/m ³	0.76 UJ	0.082 J	0.73 UJ	0.034 J
Naphthalene	µg/m ³	0.031 J	0.43	0.077 J	0.32
o-Xylene	µg/m ³	0.12 J	0.45	0.066 J	0.51
Styrene	µg/m ³	0.76 U	0.32 J	0.73 U	0.79 U
Tetrachloroethene	µg/m ³	18	24	19	25

Toluene	µg/m ³	0.62 J	0.69	0.39 J	0.40
trans-1,2-Dichloroethene	µg/m ³	0.038 U	0.038 U	0.037 U	0.040 U
Trichloroethene	µg/m ³	0.48	0.13	4.5	0.40
Vinyl chloride	µg/m ³	0.038 U	0.038 U	0.037 U	0.040 U

At SS-1 and SS-2, the reported concentrations for the round two samples are similar to the reported concentrations for the round one samples. Variability for the parameters detected above 1 ppbv includes slight increases in concentrations in round two for m&p-xylenes and PCE, and decrease in concentration in round two for TCE. These data suggest limited variability of concentrations over time. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,2,4-TCB, 1,3,5-TMB, trans-1,2-DCE, and VC.

The following table presents a side-by-side comparison of the round one (Summa canister) and round two (passive sampler) indoor air data.

		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		<i>IA-1</i>	<i>IA-1</i>	<i>IA-2</i>	<i>IA-2</i>
1,1,1-Trichloroethane	µg/m ³	0.11	0.053	0.10	0.068
1,2,4-Trimethylbenzene	µg/m ³	2.1	3.3	1.3	5.3
1,4-Dichlorobenzene	µg/m ³	0.055	0.045 U	0.022 J	0.086
Benzene	µg/m ³	1	1.6	1.5	1.7
Ethylbenzene	µg/m ³	2.5	4.5	2.7	6.8
m&p-Xylenes	µg/m ³	9.2	16	9.5	25
o-Xylene	µg/m ³	3	5.5	3.0	8.7
Styrene	µg/m ³	0.36 J	1.2	0.26 J	1.1
Tetrachloroethene	µg/m ³	1.1	1.1	0.95	1.4
Toluene	µg/m ³	16	21 J	22	29 J
Trichloroethene	µg/m ³	7.3	1.5	13	1.9

At IA-1 and IA-2, the reported concentrations for the round two samples are similar for 1,4-DCB, BZ, and PCE, greater than for 1,2,4-TMB, EB, xylenes, styrene and toluene, and less than for 1,1,1-TCA, and TCE with respect to the reported concentrations for the round one samples. The Summa canisters were deployed over a 24-hour period and the passive samplers were deployed over a 7-day period on a different date. These data suggest some variability of concentrations over time. This is inconsistent with the comparison of SS samples that indicate limited variability. The greater variability in the IA samples may be a result of variations in emissions from other potential sources unrelated to the OCC site.

Round One and Round Three Comparison

The following table presents a side-by-side comparison of the round one and round two sub-slab vapor data.

		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
		<i>SS-1</i>	<i>SS-1</i>	<i>SS-2</i>	<i>SS-2</i>
<i>Volatile Organic Compounds</i>					
1,1,1-Trichloroethane	µg/m ³	21	16	0.59	0.37
1,1,2,2-Tetrachloroethane	µg/m ³	0.038 U	0.037 U	0.037 U	0.043 U
1,1,2-Trichloroethane	µg/m ³	0.15 U	0.15 U	0.0075 J	0.17 U
1,1-Dichloroethene	µg/m ³	0.31	0.17	0.0068 J	0.043 U
1,2,4-Trichlorobenzene	µg/m ³	0.038 U	0.037 U	0.037 U	0.043 U
1,2,4-Trimethylbenzene	µg/m ³	0.76 U	0.081 J	0.73 U	0.12 J
1,3,5-Trimethylbenzene	µg/m ³	0.76 U	0.025 J	0.73 U	0.036 J
1,4-Dichlorobenzene	µg/m ³	0.038 U	0.029 J	0.033 J	0.040 J
Benzene	µg/m ³	0.20	0.16	0.11 U	0.059 J
Carbon tetrachloride	µg/m ³	0.25	0.25	0.36	0.36
Chloroform (Trichloromethane)	µg/m ³	0.52	0.39	0.046 J	0.062 J
cis-1,2-Dichloroethene	µg/m ³	0.038 U	0.037 U	0.018 J	0.043 U
Ethylbenzene	µg/m ³	0.11 J	0.11 J	0.060 J	0.086 J
Hexachlorobutadiene	µg/m ³	0.038 U	0.037 U	0.026 J	0.043 U
m&p-Xylenes	µg/m ³	0.38	0.34	0.20	0.30
Methylene chloride	µg/m ³	0.76 UJ	0.15 U	0.73 UJ	0.17 U
Naphthalene	µg/m ³	0.031 J	0.17	0.077 J	0.21
o-Xylene	µg/m ³	0.12 J	0.11 J	0.066 J	0.11 J
Styrene	µg/m ³	0.76 U	0.14 J	0.73 U	0.10 J
Tetrachloroethene	µg/m ³	18	18	19	23
Toluene	µg/m ³	0.62 J	0.37	0.39 J	0.24
trans-1,2-Dichloroethene	µg/m ³	0.038 U	0.037 U	0.037 U	0.043 U
Trichloroethene	µg/m ³	0.48	0.064	4.5	0.30
Vinyl chloride	µg/m ³	0.038 U	0.037 U	0.037 U	0.043 U

At SS-1 and SS-2, the reported concentrations for the round three samples are similar to the reported concentrations for the round one samples with the exception of TCE that is an order of magnitude lower in round three. Variability for the parameters detected above 1 ppbv includes a slight increase in concentration in round three for PCE, and decrease in round three for 1,1,1-TCA. These data suggest limited variability of concentrations over time and limited temporal effects with the possible exception of

TCE. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,2,4-TMB, MC, trans-1,2-DCE, and VC.

The following table presents a side-by-side comparison of the round one and round three indoor air summa canister data.

		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
<i>Volatile Organic Compounds</i>		<i>IA-1</i>	<i>IA-1</i>	<i>IA-2</i>	<i>IA-2</i>
1,1,1-Trichloroethane	µg/m ³	0.11	0.070	0.10	0.058
1,1,2,2-Tetrachloroethane	µg/m ³	0.038 U	0.040 U	0.040 U	0.039 U
1,1,2-Trichloroethane	µg/m ³	0.15 U	0.16 U	0.16 U	0.15 U
1,1-Dichloroethene	µg/m ³	0.0070 J	0.040 U	0.040 U	0.039 U
1,2,4-Trichlorobenzene	µg/m ³	0.038 U	0.040 U	0.040 U	0.039 U
1,2,4-Trimethylbenzene	µg/m ³	2.0	1.6	1.3	2.3
1,3,5-Trimethylbenzene	µg/m ³	0.56 J	0.54 J	0.48 J	0.76
1,4-Dichlorobenzene	µg/m ³	0.055	0.093	0.022 J	0.030 J
Benzene	µg/m ³	1.0	0.85	1.5	1.1
Carbon tetrachloride	µg/m ³	0.46	0.33 J	0.47	0.45
Chloroform (Trichloromethane)	µg/m ³	0.10 J	0.11 J	0.099 J	0.22
cis-1,2-Dichloroethene	µg/m ³	0.038 U	0.15	0.040 U	0.14
Ethylbenzene	µg/m ³	2.5	2.4	2.7	3.1
Hexachlorobutadiene	µg/m ³	0.038 U	0.040 U	0.040 U	0.039 U
m&p-Xylenes	µg/m ³	9.2	8.5	9.5	11
Methylene chloride	µg/m ³	1.6 J	0.78	1.3 UJ	0.81
Naphthalene	µg/m ³	0.41	0.39 J	0.067 J	0.48
o-Xylene	µg/m ³	3.0	2.7	3.0	3.6
Styrene	µg/m ³	0.34 J	0.35	0.26 J	0.26
Tetrachloroethene	µg/m ³	1.1	26	0.95	55
Toluene	µg/m ³	16	7.8	22	11
trans-1,2-Dichloroethene	µg/m ³	0.038 U	0.027 J	0.040 U	0.034 J
Trichloroethene	µg/m ³	7.3	3.7	13	8.3
Vinyl chloride	µg/m ³	0.038 U	0.18	0.040 U	0.16

The reported concentrations for the round three samples are similar to the reported concentrations for the round one samples with the exception of PCE that is one to two orders of magnitude higher in round three. Variability for the other parameters detected above 1 ppbv includes: slight decreases in concentrations in round three for 1,2,4-TMB (AI-1), BZ (AI-1 and AI-2), EB (AI-1), m&p-xylenes (AI-1), MC (AI-1 and AI-2), and o-xylene (AI-1); decreases for toluene (AI-1 and AI-2), and TCE (AI-1 and

AI-2); slight increases for 1,2,4-TMB (AI-2), EB (AI-2), m&p-xylenes (AI-2), o-xylene (AI-2). These data suggest limited variability in concentrations over time and limited temporal effects with the exception of PCE. The variability of PCE is inconsistent with the generally consistent results for SS and OA samples between sampling rounds. The observed variability of the PCE IA results is indicative of variable emissions from another potential source unrelated to the OCC site. As discussed previously, PCE has been identified in materials stored and/or used in the building. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,1,2-TCA, 1,2,4-TCB, and HCBD.

Additional Analysis of the Data

The sub-slab concentrations may be contributing to indoor air concentrations via the vapor intrusion pathway. However, the contributions would not be significant for the parameters that were detected in sub-slab samples at concentrations below the cancer screening values and below HQs, and in some cases below indoor air concentrations.

The sub-slab TCE concentration measured sub-slab probe 2 of 4.5 µg/m³ was not confirmed in the round two or round three sampling. Concentration of 0.40 and 0.30 µg/m³ was measured in the round two and three samples, respectively, that are an order of magnitude lower than the round one result. The concentrations of the other target parameters in the round two and three samples were similar to or greater than the concentrations in the round one sample. The rounds two and three concentrations of TCE at sub-slab probe 2 are consistent with the round one, two, and three concentrations measured at the other sub-slab probe with the exception of SS-32. It was identified during the building survey conducted prior to the rounds two and three sampling that a TCE potential source exists inside the building.

The following is a discussion of the most recent, shallowest, and nearby groundwater data presented in Table 7 with respect to SS analytical results. TCE was not detected in a recent (2012) shallow groundwater sample collected from location 41C-25, representing the most recent, shallowest, and nearby groundwater data. Other parameters that were detected in sub-slab air samples but were not detected in groundwater include 1,1-DCE, BZ, CT, chloroform, EB, m&p-xylenes, MC, o-xylene, and PCE. Parameters detected in the sub-slab air samples and groundwater sample include cis-1,2-DCE and toluene. The remaining detected parameters in sub-slab air samples were not reported for the groundwater sample.

The following discusses a comparison of the analytical results to non-cancer screening levels for chronic exposures at values that represent a hazard quotient of 0.1 (adjusted

HQ) except for TCE for purposes of evaluating short-term exposures to women of reproductive age. RLs are above the EPA RSL adjusted HQ for 1,1,2-TCA for indoor air. The RLs for 1,1,2-TCA are less than 20 percent of the EPA RSL HQ and would not contribute to a cumulative HI since the results are non-detect. Concentrations exceed the EPA RSL adjusted HQs for 1,2,4-TMB and TCE for indoor air. The exceedances for 1,2,4-TMB and TCE have been concluded to be attributed to an indoor source since the sub-slab concentrations are lower and do not exceed the adjusted HQs. These two parameters have different primary target organs (blood system and developmental effects). There are no exceedances of EPA RSL adjusted HQs for sub-slab results. Since no detected concentrations exceed the EPA RSL adjusted HQs, cumulative non-cancer health effects would be less than a HI of 1. Concentrations exceed the MTCA adjusted HQs for 1,2,4-TMB, BZ, naphthalene, o-xylene, PCE, and TCE for indoor air. The exceedances for 1,2,4-TMB, BZ, naphthalene, o-xylene are likely attributable to an indoor/outdoor source since the sub-slab concentrations are lower and do not exceed the adjusted HQs. The parameters have a different primary target organs; 1,2,4-TMB and BZ (blood system), naphthalene and o-xylene (body weight), PCE (central nervous system), and TCE (developmental effects). The exceedance for PCE is less than 11 percent of the MTCA HQ and would not contribute to a cumulative primary target organ HI greater than 1. The exceedances for TCE are likely attributable to an indoor/outdoor source since the sub-slab concentrations are lower and do not exceed the adjusted HQs with one exception from round one that is less than 50 percent of the MTCA HQ. Concentrations of PCE exceed the MTCA adjusted HQ for sub-slab but are less than 15 percent of the MTCA HQ and would not contribute to a cumulative primary target organ HI greater than 1. As noted above, one concentration of TCE from round one exceeds the MTCA adjusted HQ for sub-slab and there were no exceedances in round two. This one exceedance would not contribute to a cumulative primary target organ HI greater than 1. The above discussion is applicable to the round three data since the round three results are similar to the round one results as discussed above.

Recommendation

It is recommended shop area in this building be scheduled for additional monitoring by GSH to confirm SS vapor concentrations and further assess this portion of the building.

3.6 BUILDING 595

Figure 7 shows the sample locations and layout of Building 595.

Building Properties and Usage

Building 595 is Trident's warehouse to support its fishing fleet. The 200-ft by 150-ft building is 24 ft high and steel sided over steel frame built on concrete slab on grade. Available building construction drawings show a 6-mil vapor barrier is installed within a 6-inch sand layer located 2 inches beneath the concrete slab; however, no evidence of the vapor barrier was encountered during the drilling and installation of the SS vapor probes. The drill bit was advanced 6 inches below the bottom of the slab. Slab thickness measured during the probe installation was 6.25 inches. Where visible, the concrete slab is in good condition. There is a small (one-desk) office along the west wall of this building that is frequently occupied on a seasonal basis. There are no other offices or continually occupied spaces within the building. There is no HVAC system in the warehouse area. The building has a number of large overhead doors. Vapors could potentially intrude into this building through cracks in the floor slab, unsealed utility penetrations, and un-caulked floor/wall or expansion joints.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

Two SS vapor probes were installed where concurrent SS/IA samples were collected, as discussed below.

Sample pair SS/IA-4 was located near the southeastern corner of Building 595. During the pre-sampling survey, the area was observed to contain pallets of cardboard boxes. A single large cardboard tote was located near the southeastern corner of the building. The tote contained miscellaneous fishing material and a 5-gallon pail of chlorine pellets. It was requested of Tyson personnel that the tote be removed prior to sampling. The tote was not observed during the sampling event.

Sample pair SS/IA-5 was located in the only enclosed office structure within Building 595. Staff occupy this office seasonally when fishing vessels are in operation and delivering cargo to the building. The office shares a wall with the electrical, fire control, and mechanical room. The small size of the office prevented an accurate utility clearance from being completed; therefore, the SS sample was moved to the east approximately 25 ft into the warehouse area. The IA sample was collected from within the enclosed office space. No chemical storage or other obvious potential VOC emitters were observed in this office space. SS-5 was located approximately 25 ft east outside of the office in the warehouse area. IA-5 was collected from within the small office space.

Sampling in Building 595 was initiated on April 20, 2013 with the 24-hour samples completed the following day. An associated OA sample (OA-4) was collected at a location just to the south of Building 595. Weather conditions during sampling were partly cloudy and calm, with winds from the south, and no precipitation was observed.

Round Two

Indoor air and sub-slab vapor samples were collected at the same IA/SS sample locations as the round one event. One additional IA sample (IA-26) was collected from a centrally located position within the building in accordance with USEPA request. Prior to conducting the round two sampling event, a detailed survey was completed for Building 595, at which time the tenant was asked to fill out a questionnaire and provide MSDSs for all chemicals used or stored within the building. During the building inventory and survey, no target analytes were identified. Copies of the submitted building survey questionnaire and MSDSs are included in Appendix A.

The indoor and ambient air sampling was initiated on June 24, 2013 using passive sampling equipment. The samples were collected 7 days later. Sub-slab sampling was conducted on June 28, 2013 with the 2-hour samples completed the same day. An associated OA sample for this building (OA-4) was collected outside of the building.

Round Three

Eight Summa canister samples were collected during round three including at three SS locations paired with three IA locations (one new SS probe at an existing IA location and two existing pairs), one new IA location, and one OA location. Additionally, two passive samples were collected, one from IA location 5 (IA-5P) and one from new OA location 5 (OA-5P), as specified by USEPA.

Sample location IA-26 was previously sampled in round two to represent the center of the building space. A new SS probe (SS-26) was paired with it for round three.

A site walk was conducted on February 7, 2014 to investigate potential preferential pathways specifically targeting utility penetrations. During this building inspection, the mechanical room at the very northwest corner of the building was investigated, a large diameter cut in the concrete floor was observed. The cut is to allow access to the watermain for the fire suppression system. An IA sample (IA-36) was added to this room.

Sample pairs SS/IA-4 and SS/IA-5 are unchanged from round one.

Prior to conducting the round three sampling event, a detailed survey was completed for Building 595, at which time the tenant was asked to fill out a questionnaire and provide MSDSs for all chemicals used or stored within the building. Consistent with round two, the building inventory and survey did not reveal any target analytes stored or in use in the building. Copies of the submitted building survey questionnaire and MSDSs are included in Appendix A.

The indoor and ambient air sampling was initiated on March 11, 2014 using passive sampling equipment at IA-5P and OA-5P. The samples were retrieved 7 days later. Summa canister SS and IA sampling was initiated on March 12, 2014 with the 2-hour samples completed the same day and the 24-hour samples were completed the following day. An associated Summa canister OA sample for this building (OA-4) was collected outside of the building on the south side.

Sampling Results

Round One

Analytical results are presented in Table 8 and detected parameters summarized on Figure 7.

IA concentrations of BZ and CT exceeded IA screening levels.

IA concentrations of BZ (up to $0.82 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.32 \mu\text{g}/\text{m}^3$), and were higher than the OA concentration ($0.23 \mu\text{g}/\text{m}^3$). BZ was not detected in SS samples; however, the RL for BZ in SS samples was elevated (3.7 to $3.9 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for BZ may be attributable to outdoor source and with a possible unconfirmed contribution from sub-slab source.

IA concentrations of CT (up to $0.47 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.42 \mu\text{g}/\text{m}^3$), were lower than the OA concentration ($0.49 \mu\text{g}/\text{m}^3$), and were higher than SS concentrations ($0.15 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source.

The SS concentrations of chloroform at SS-4 ($2.2 \mu\text{g}/\text{m}^3$) and SS-5 ($1.4 \mu\text{g}/\text{m}^3$) exceeded a SS MTCA screening level ($1.1 \mu\text{g}/\text{m}^3$) and were two orders of magnitude higher than the IA concentrations at IA-4 ($0.083 \mu\text{g}/\text{m}^3$) and IA-5 ($0.078 \mu\text{g}/\text{m}^3$) which were below IA screening levels. It is therefore concluded that SS concentrations of chloroform in exceedance of the SS screening levels are being adequately attenuated.

The SS concentrations of PCE at SS-4 (3,800 $\mu\text{g}/\text{m}^3$) and SS-5 (3,600 $\mu\text{g}/\text{m}^3$) exceeded the SS USEPA (470 and 1,800 $\mu\text{g}/\text{m}^3$) and MTCA (96 and 183 $\mu\text{g}/\text{m}^3$) screening levels and were three to four orders of magnitude higher than the IA concentrations at IA-4 (0.34 $\mu\text{g}/\text{m}^3$) and IA-5 (1.4 $\mu\text{g}/\text{m}^3$) which were below the IA screening levels (9.6 $\mu\text{g}/\text{m}^3$ and higher). It is therefore concluded that SS concentrations of PCE in exceedance of the SS screening levels are being adequately attenuated.

The SS concentrations of TCE at SS-4 (1,600 $\mu\text{g}/\text{m}^3$) and SS-5 (1,500 $\mu\text{g}/\text{m}^3$) exceeded the SS USEPA (30 and 88 $\mu\text{g}/\text{m}^3$) and MTCA (6.1 and 9.1 $\mu\text{g}/\text{m}^3$) screening levels and were three to four orders of magnitude higher than the IA concentrations at IA-4 (0.089 $\mu\text{g}/\text{m}^3$) and IA-5 (0.24 $\mu\text{g}/\text{m}^3$) which were below the IA screening levels (0.61 $\mu\text{g}/\text{m}^3$ and higher). It is therefore concluded that SS concentrations of TCE in exceedance of the SS screening levels are being adequately attenuated.

In summary, it is concluded that IA screening level exceedances for BZ may be attributable to an outdoor source, with a possible unconfirmed contribution from a sub-slab source due to elevated reporting limits (no specific obvious indoor sources were noted in the building). IA screening level exceedances for CT are likely attributable to an outdoor source. SS concentrations of chloroform, PCE, and TCE in exceedance of the SS screening levels are being adequately attenuated.

Round Two

Analytical results are presented in Table 8 and detected parameters summarized on Figure 7.

IA concentrations of BZ exceeded IA screening levels.

IA concentrations of BZ (up to 0.56 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.32 $\mu\text{g}/\text{m}^3$), but are lower than the OA concentration (0.7 $\mu\text{g}/\text{m}^3$). BZ was detected in both SS-4 and SS-5 samples (6.9 and 5.1 $\mu\text{g}/\text{m}^3$, respectively), exceeding the MTCA screening level (3.2 $\mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for BZ may be attributable to an outdoor source. There does not appear to be a contribution from a sub-slab source.

The SS concentrations of chloroform at SS-4 (3.2 J $\mu\text{g}/\text{m}^3$) and SS-5 (1.9 J $\mu\text{g}/\text{m}^3$) exceeded a SS MTCA screening level (1.1 $\mu\text{g}/\text{m}^3$) and are similar to the concentrations detected in round one.

The SS concentrations of PCE at SS-4 (7,400 $\mu\text{g}/\text{m}^3$) and SS-5 (5,400 $\mu\text{g}/\text{m}^3$) exceeded the SS USEPA (470 and 1,800 $\mu\text{g}/\text{m}^3$) and MTCA (96 and 183 $\mu\text{g}/\text{m}^3$) screening levels and were four orders of magnitude higher than the IA concentrations at IA-4 (0.64 J $\mu\text{g}/\text{m}^3$) and IA-5 (1 $\mu\text{g}/\text{m}^3$) which were below the IA screening levels (9.6 $\mu\text{g}/\text{m}^3$ and higher). It is therefore concluded that SS concentrations of PCE in exceedance of the SS screening levels are being adequately attenuated.

The SS concentrations of TCE at SS-4 (2,500 $\mu\text{g}/\text{m}^3$) and SS-5 (1,800 $\mu\text{g}/\text{m}^3$) exceeded the SS USEPA (30 and 88 $\mu\text{g}/\text{m}^3$) and MTCA (6.1 and 9.1 $\mu\text{g}/\text{m}^3$) screening levels and were three orders of magnitude higher than the IA concentrations at IA-4 (0.27 J $\mu\text{g}/\text{m}^3$) and IA-5 (0.4 $\mu\text{g}/\text{m}^3$) which were below the IA screening levels (0.61 $\mu\text{g}/\text{m}^3$ and higher). It is therefore concluded that SS concentrations of TCE in exceedance of the SS screening levels are being adequately attenuated.

In summary, it is concluded that IA screening level exceedances for BZ may be attributable to an outdoor sources (no specific obvious indoor sources were noted in the building). There does not appear to be a BZ contribution to IA from a sub-slab source. SS concentrations of BZ, chloroform, PCE, and TCE in exceedance of the SS screening levels are being adequately attenuated.

Round Three

Analytical results are presented in Table 8 and detected parameters summarized on Figure 7.

IA concentrations of BZ, CT, chloroform, and naphthalene exceeded IA screening levels.

IA concentrations of BZ (up to 1.3 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.32 $\mu\text{g}/\text{m}^3$), and were similar to the OA concentration (1.2 $\mu\text{g}/\text{m}^3$). BZ concentrations in the SS samples were below screening criteria and similar to or less than the IA and OA concentrations. It is therefore concluded that IA MTCA screening level exceedances for BZ may be attributable to outdoor sources.

IA concentrations of CT (up to 0.47 $\mu\text{g}/\text{m}^3$) marginally exceeded an IA MTCA screening level (0.42 $\mu\text{g}/\text{m}^3$), were marginally higher than the OA concentration (0.36 $\mu\text{g}/\text{m}^3$), and were higher than two SS results (0.86 U and 0.12 J $\mu\text{g}/\text{m}^3$) and lower than one SS result (1.4 $\mu\text{g}/\text{m}^3$), which are below screening criteria. It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source.

The IA concentration of chloroform at IA-26 ($0.12 \mu\text{g}/\text{m}^3$) marginally exceeded an IA MTCA screening level ($0.11 \mu\text{g}/\text{m}^3$) and was slightly higher than the OA concentration ($0.094 \mu\text{g}/\text{m}^3$). The paired SS concentration is below screening criteria. The IA concentration is below the screening levels when the OA concentration is subtracted. It is therefore concluded that IA MTCA screening level exceedances for chloroform is likely attributable to an outdoor source.

The IA concentration of naphthalene at IA-4 ($0.41 \mu\text{g}/\text{m}^3$) marginally exceeded an USEPA RSL ($0.36 \mu\text{g}/\text{m}^3$) and was higher than the OA concentration ($0.19 \mu\text{g}/\text{m}^3$). Naphthalene was not detected in the paired SS sample; however, the RL was elevated. As noted previously, if a positive detection was observed for any compound below the RL in a sample, then the laboratory was instructed to report the result. Measured concentrations in the other SS samples were less than the IA and OA results. It is therefore concluded that IA MTCA screening level exceedances for naphthalene may be attributable to indoor and/or outdoor sources.

The SS concentration of chloroform at SS-4 ($1.8 \mu\text{g}/\text{m}^3$) exceeded a SS MTCA screening level ($1.1 \mu\text{g}/\text{m}^3$) and is similar to the concentrations detected in rounds one and two. The SS concentration of chloroform at SS-5 ($5.4 \mu\text{g}/\text{m}^3$) exceeded a SS MTCA screening level ($1.1 \mu\text{g}/\text{m}^3$) and a USEPA RSL ($5.3 \mu\text{g}/\text{m}^3$) and is higher than the concentrations detected in rounds one and two. As noted above, the IA concentration may be attributable to outdoor sources and similar to rounds one and two, and SS concentrations of chloroform in exceedance of the SS screening levels are being adequately attenuated.

The SS concentrations of PCE at SS-4 ($3,000 \mu\text{g}/\text{m}^3$), SS-5 ($1,400 \mu\text{g}/\text{m}^3$), and SS-26 ($2,900 \mu\text{g}/\text{m}^3$) exceeded the SS USEPA (470 and $1,800 \mu\text{g}/\text{m}^3$) and MTCA (96 and $183 \mu\text{g}/\text{m}^3$) screening levels and were four orders of magnitude higher than the IA concentrations at IA-4 ($0.57 \mu\text{g}/\text{m}^3$), IA-5 ($1.1 \mu\text{g}/\text{m}^3$), and IA-26 ($0.65 \mu\text{g}/\text{m}^3$) which were below the IA screening levels ($9.6 \mu\text{g}/\text{m}^3$ and higher). It is therefore concluded that SS concentrations of PCE in exceedance of the SS screening levels are being adequately attenuated.

The SS concentrations of TCE at SS-4 ($2,500 \mu\text{g}/\text{m}^3$) and SS-5 ($1,800 \mu\text{g}/\text{m}^3$) exceeded the SS USEPA (30 and $88 \mu\text{g}/\text{m}^3$) and MTCA (6.1 and $9.1 \mu\text{g}/\text{m}^3$) screening levels and were three orders of magnitude higher than the IA concentrations at IA-4 ($0.27 \mu\text{g}/\text{m}^3$) and IA-5 ($0.4 \mu\text{g}/\text{m}^3$) which were below the IA screening levels ($0.61 \mu\text{g}/\text{m}^3$ and higher). It is therefore concluded that SS concentrations of TCE in exceedance of the SS screening levels are being adequately attenuated.

The analytical results for the passive samples were generally similar to the Summa canister collected at the same location for IA and OA.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-4</i>	<i>IA-5</i>	<i>IA-26</i>	<i>IA-36</i>
<i>Volatile Organic Compounds</i>		<i>- OA-4</i>	<i>- OA-4</i>	<i>- OA-4</i>	<i>- OA-4</i>
1,1,1-Trichloroethane	µg/m ³	-0.005	-0.002	-0.002	-0.002
1,1,2,2-Tetrachloroethane	µg/m ³	-0.008U	-0.002U	-0.002U	-0.003U
1,1,2-Trichloroethane	µg/m ³	-0.03U	0.00U	-0.01U	-0.01U
1,1-Dichloroethene	µg/m ³	-0.008U	-0.002U	-0.002U	-0.003U
1,2,4-Trichlorobenzene	µg/m ³	-0.008U	-0.002U	-0.002U	-0.003U
1,2,4-Trimethylbenzene	µg/m ³	0.40	0.53	0.77	0.57
1,3,5-Trimethylbenzene	µg/m ³	0.11	0.15	0.28	0.19
1,4-Dichlorobenzene	µg/m ³	-1.166	-1.169	-1.080	-1.162
Benzene	µg/m ³	-0.20	0.00	0.10	-0.20
Carbon tetrachloride	µg/m ³	0.06	0.11	0.10	0.11
Chloroform (Trichloromethane)	µg/m ³	0.006	0.016	0.026	0.016
cis-1,2-Dichloroethene	µg/m ³	-0.015	-0.001	-0.003	-0.002
Ethylbenzene	µg/m ³	0.19	0.59	0.59	0.59
Hexachlorobutadiene	µg/m ³	0.010U	0.016U	0.016U	0.015U
m&p-Xylenes	µg/m ³	0.9	1.8	2.4	2.1
Methylene chloride	µg/m ³	1.54	0.01	-0.05	-0.10
Naphthalene	µg/m ³	0.22	-0.08	0.00	0.00
o-Xylene	µg/m ³	0.5	0.8	0.9	0.8
Styrene	µg/m ³	0.05	0.10	0.32	0.29
Tetrachloroethene	µg/m ³	-1.43	-0.90	-1.35	0.60
Toluene	µg/m ³	3.4	3.7	3.4	3.4
trans-1,2-Dichloroethene	µg/m ³	0.021U	0.00	0.027U	0.00
Trichloroethene	µg/m ³	-0.12	-0.06	-0.09	0.22
Vinyl chloride	µg/m ³	-0.007	0.002	-0.003	0.00

As shown in the above table, none of the adjusted IA the screening criteria.

In summary, it is concluded that IA screening level exceedances for BZ, CT, chloroform, and naphthalene are likely attributable to outdoor source and/or indoor source for

naphthalene (no specific obvious indoor sources were noted in the building). SS concentrations of chloroform, PCE, and TCE in exceedance of the SS screening levels are being adequately attenuated.

Round One and Round Two Comparison

The following table presents a side-by-side comparison of the round one and round two sub-slab vapor data.

		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		<i>SS-4</i>	<i>SS-4</i>	<i>SS-5</i>	<i>SS-5</i>
1,1,1-Trichloroethane	µg/m ³	8.0	9.8	1.8	2.2 J
1,1,2,2-Tetrachloroethane	µg/m ³	1.2 U	0.81 U	1.3 U	0.75 U
1,1,2-Trichloroethane	µg/m ³	4.9 U	0.59 U	5.1 U	0.54 U
1,1-Dichloroethene	µg/m ³	1.2 U	0.53 U	1.3 U	0.49 U
1,2,4-Trichlorobenzene	µg/m ³	1.2 U	3.3 U	1.3 U	3.0 U
1,2,4-Trimethylbenzene	µg/m ³	25 U	4.7 U	22 U	4.3 U
1,3,5-Trimethylbenzene	µg/m ³	25 U	4.7 U	22 U	4.3 U
1,4-Dichlorobenzene	µg/m ³	1.2 U	2.1 U	1.3 U	1.9 U
Benzene	µg/m ³	3.7 U	6.9 J	3.9 U	5.1 J
Carbon tetrachloride	µg/m ³	0.15 J	0.50 U	1.3 U	0.46 U
Chloroform (Trichloromethane)	µg/m ³	2.2 J	3.2 J	1.4 J	1.9 J
cis-1,2-Dichloroethene	µg/m ³	0.97 J	1.7 U	0.51 J	1.6 U
Ethylbenzene	µg/m ³	4.9 U	0.79 U	5.1 U	0.73 U
Hexachlorobutadiene	µg/m ³	1.2 U	1.6 U	1.3 U	1.5 U
m&p-Xylenes	µg/m ³	4.9 U	1.7 U	5.1 U	1.5 U
Methylene chloride	µg/m ³	25 UJ	1.6 U	22 UJ	1.5 U
Naphthalene	µg/m ³	4.9 U	3.1 U	5.1 U	2.9 U
o-Xylene	µg/m ³	4.9 U	0.76 U	5.1 U	0.70 U
Styrene	µg/m ³	25 U	4.7 U	22 U	4.3 U
Tetrachloroethene	µg/m ³	3800	7400	3600	5400
Toluene	µg/m ³	4.9 U	2.6 J	5.1 U	2.5 J
trans-1,2-Dichloroethene	µg/m ³	1.2 U	1.9 U	1.3 U	1.7 U
Trichloroethene	µg/m ³	1600	2500	1500	1800
Vinyl chloride	µg/m ³	1.2 U	0.43 U	1.3 U	0.40 U

At SS-4 and SS-5, the reported concentrations for the round two samples are similar to or greater than the reported concentrations for the round one samples. Variability for the parameters detected above one ppbv includes slight increases in concentrations in round

two for 1,1,1-TCA, BZ, and chloroform, and increases in concentrations in round two for PCE and TCE. These data suggest some variability of concentrations over time. Most of the parameters were not detected in both rounds of sampling; however, the reporting limits were elevated because of sample dilution necessary to quantify elevated concentrations of PCE and TCE.

The following table presents a side-by-side comparison of the round one (Summa canister) and round two (passive sampler) indoor air data.

		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		<i>IA-4</i>	<i>IA-4</i>	<i>IA-5</i>	<i>IA-5</i>
1,1,1-Trichloroethane	µg/m ³	0.024 J	0.050 UJ	0.028 J	0.050 U
1,2,4-Trimethylbenzene	µg/m ³	1.0	0.72 J	1.2	1.8
1,4-Dichlorobenzene	µg/m ³	0.022 J	0.052 J	0.037 U	0.062
Benzene	µg/m ³	0.82	0.55 J	0.75	0.56
Ethylbenzene	µg/m ³	0.92	1.6 J	0.92	2.1
m&p-Xylenes	µg/m ³	3.3	5.6 J	3.1	7.0
o-Xylene	µg/m ³	1.2	2.2 J	1.1	2.7
Styrene	µg/m ³	0.35 J	1.7 J	0.28 J	1.8
Tetrachloroethene	µg/m ³	0.34	0.64 J	1.4	1.0
Toluene	µg/m ³	3.8	3.5 J	3.5	5.2
Trichloroethene	µg/m ³	0.089	0.27 J	0.24	0.40

At IA-1 and IA-2, the reported concentrations for the round two samples are similar with respect to the reported concentrations for the round one samples. The Summa canisters were deployed over a 24-hour period and the passive samplers were deployed over a 7-day period on a different date. These data suggest limited variability of concentrations over time. This is inconsistent with the comparison of SS samples that indicate some variability. The greater variability in the SS samples may be a result of limited vapor migration to indoor air and/or high attenuation in Building 595.

Round One and Round Three Comparison

The following table presents a side-by-side comparison of the round one and round three Summa canister sub-slab vapor data.

		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
<i>Volatile Organic Compounds</i>		<i>SS-4</i>	<i>SS-4</i>	<i>SS-5</i>	<i>SS-5</i>
1,1,1-Trichloroethane	µg/m ³	8.0	6.2	1.8	1.9
1,1,2,2-Tetrachloroethane	µg/m ³	1.2 U	0.86 U	1.3 U	0.43 U
1,1,2-Trichloroethane	µg/m ³	4.9 U	3.4 U	5.1 U	1.7 U
1,1-Dichloroethene	µg/m ³	1.2 U	0.86 U	1.3 U	0.43 U
1,2,4-Trichlorobenzene	µg/m ³	1.2 U	0.86 U	1.3 U	0.43 U
1,2,4-Trimethylbenzene	µg/m ³	25 U	3.4 U	22 U	1.7 U
1,3,5-Trimethylbenzene	µg/m ³	25 U	3.4 U	22 U	1.7 U
1,4-Dichlorobenzene	µg/m ³	1.2 U	0.86 U	1.3 U	0.43 U
Benzene	µg/m ³	3.7 U	1.2 J	3.9 U	1.3
Carbon tetrachloride	µg/m ³	0.15 J	0.86 U	1.3 U	1.4
Chloroform (Trichloromethane)	µg/m ³	2.2 J	1.8 J	1.4 J	5.4
cis-1,2-Dichloroethene	µg/m ³	0.97 J	0.71 J	0.51 J	2.1
Ethylbenzene	µg/m ³	4.9 U	3.4 U	5.1 U	1.7 U
Hexachlorobutadiene	µg/m ³	1.2 U	0.86 U	1.3 U	0.43 U
m&p-Xylenes	µg/m ³	4.9 U	3.4 U	5.1 U	0.38 J
Methylene chloride	µg/m ³	25 UJ	3.4 U	22 UJ	1.7 U
Naphthalene	µg/m ³	4.9 U	3.4 U	5.1 U	0.17 J
o-Xylene	µg/m ³	4.9 U	3.4 U	5.1 U	0.30 J
Styrene	µg/m ³	25 U	3.4 U	22 U	1.7 U
Tetrachloroethene	µg/m ³	3800	3000	3600	1400
Toluene	µg/m ³	4.9 U	0.59 J	5.1 U	0.86 J
trans-1,2-Dichloroethene	µg/m ³	1.2 U	0.23 J	1.3 U	1.2
Trichloroethene	µg/m ³	1600	1400	1500	940
Vinyl chloride	µg/m ³	1.2 U	0.86 U	1.3 U	0.43 U

At SS-4 and SS-5, the reported concentrations for the round three samples are similar to or less than (with few exceptions) the reported concentrations for the round one samples. Variability for the parameters detected above 1 ppbv includes: slight decreases in concentrations in round three for 1,1,1-TCA and chloroform; decreases in concentrations in round three for PCE and TCE; and increases for chloroform and cis-1,2-DCE. These data suggest some variability in concentrations over time. Most of the parameters were not detected in round one of sampling; however, the reporting limits were elevated because of sample dilution necessary to quantify elevated concentrations of PCE and TCE. In round three, the parameters not detected include 1,1,2,2-PCA, 1,1,2-TCA, 1,1-DCE, 1,2,4-TCB, 1,2,4-TMB, 1,3,5-TMB, 1,4-DCB, EB, HCBD, MC, styrene, and VC.

The following table presents a side-by-side comparison of the round one and round three Summa canister indoor air data.

		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
<i>Volatile Organic Compounds</i>		<i>IA-4</i>	<i>IA-4</i>	<i>IA-5</i>	<i>IA-5</i>
1,1,1-Trichloroethane	µg/m ³	0.024 J	0.023 J	0.028 J	0.026 J
1,1,2,2-Tetrachloroethane	µg/m ³	0.038 U	0.030 U	0.037 U	0.036 U
1,1,2-Trichloroethane	µg/m ³	0.15 U	0.12 U	0.0051 J	0.15 U
1,1-Dichloroethene	µg/m ³	0.038 U	0.030 U	0.037 U	0.036 U
1,2,4-Trichlorobenzene	µg/m ³	0.038 U	0.030 U	0.037 U	0.036 U
1,2,4-Trimethylbenzene	µg/m ³	1.0	0.83	1.2	0.96
1,3,5-Trimethylbenzene	µg/m ³	0.28 J	0.24	0.33 J	0.28
1,4-Dichlorobenzene	µg/m ³	0.022 J	0.034	0.037 U	0.031 J
Benzene	µg/m ³	0.82	1.0	0.75	1.2
Carbon tetrachloride	µg/m ³	0.44	0.42	0.47	0.47
Chloroform (Trichloromethane)	µg/m ³	0.083 J	0.10 J	0.078 J	0.11 J
cis-1,2-Dichloroethene	µg/m ³	0.023 J	0.042	0.037 U	0.056
Ethylbenzene	µg/m ³	0.92	1.1	0.92	1.5
Hexachlorobutadiene	µg/m ³	0.038 U	0.030 U	0.037 U	0.036 U
m&p-Xylenes	µg/m ³	3.3	4.0	3.1	4.9
Methylene chloride	µg/m ³	0.26	2.1	0.74 UJ	0.57
Naphthalene	µg/m ³	0.23	0.41	0.20	0.11 J
o-Xylene	µg/m ³	1.2	1.4	1.1	1.7
Styrene	µg/m ³	0.35 J	0.38	0.28 J	0.43
Tetrachloroethene	µg/m ³	0.34	0.57	1.4	1.1
Toluene	µg/m ³	3.8	6.3	3.5	6.6
trans-1,2-Dichloroethene	µg/m ³	0.038 U	0.030 U	0.037 U	0.0093 J
Trichloroethene	µg/m ³	0.089	0.18	0.24	0.24
Vinyl chloride	µg/m ³	0.0040 J	0.017 J	0.037 U	0.026 J

The reported concentrations for the round three samples are similar to the reported concentrations for the round one samples with the exception of BZ, EB, MC, xylenes, and toluene. Variability for the parameters detected above 1 ppbv includes: slight decreases in concentrations in round three for 1,2,4-TMB and PCE (IA-5); and increases for BZ, EB, MC, m&p-xylenes, o-xylene, and toluene. These data suggest limited variability in concentrations over time and limited temporal effects with the possible exceptions noted. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,1-DCE, 1,2,4-TCB, and HCBD.

Additional Analysis of the Data

The sub-slab concentrations may be contributing to indoor air concentrations via the vapor intrusion pathway. However, the concentrations appear to be adequately attenuated.

The following is a discussion of the most recent, shallowest, and nearby groundwater and soil data presented in Table 8 with respect to SS analytical results. TCE and PCE were detected in a recent (2012) shallow groundwater sample collected from location 10-24 and shallow soil samples from locations WMUR-03, WMUR-04, and WMUR-10, representing the most recent, shallowest, and nearby data. BZ was detected in sub-slab air samples but was not detected in groundwater or soil. Other parameters detected in the sub-slab air samples and groundwater or soil samples include CT, chloroform, cis-1,2-DCE, and toluene. The remaining detected parameters in sub-slab air samples were not detected or not reported for groundwater and soil samples.

The following discusses a comparison of the analytical results to non-cancer screening levels for chronic exposures at values that represent a hazard quotient of 0.1 (adjusted HQ) except for TCE for purposes of evaluating short-term exposures to women of reproductive age. RLs are above the EPA RSL adjusted HQ for 1,1,2-TCA for indoor air. The RLs for 1,1,2-TCA are less than 20 percent of the EPA RSL HQ and would not contribute to a cumulative HI since the results are non-detect. No concentrations exceeded the EPA RSL adjusted HQs for indoor air. Concentrations exceeded EPA RSL adjusted and non-adjusted HQs for PCE and TCE for sub-slab. The exceedances for PCE and TCE have been concluded to be adequately attenuated and an additional round of monitoring by GSH is recommended to confirm that this is the case. It should be noted that these two parameters have different primary target organs (central nervous system and developmental effects). Concentrations exceed the MTCA adjusted HQs for 1,2,4-TMB, naphthalene, and TCE for indoor air. The parameters have a different primary target organs; 1,2,4-TMB (blood system), naphthalene (body weight), and TCE (developmental effects). The exceedances for 1,2,4-TMB, naphthalene, and TCE are less than 60, 20, and 45 percent of the MTCA HQs and would not contribute to cumulative primary target organ HIs greater than 1. RLs are above the MTCA adjusted HQs for 1,2,4-TCB, 1,2,4-TMB, and naphthalene for sub-slab. It should be noted that the RLs were elevated because of necessary dilution of the sample to quantify other target parameters. The RLs for 1,2,4-TCB, 1,2,4-TMB, and naphthalene are less than 40, 80, 40 percent, respectively, of the EPA RSL HQs and would not contribute to cumulative primary target organ HIs since the results are non-detect. Concentrations exceeded MTCA RSL adjusted and non-adjusted HQs for PCE and TCE for sub-slab. As noted above, these parameters are adequately attenuated based on review of the indoor air

data. The above discussion is applicable to the round three data since the round three results are generally similar to or less than the round one results as discussed above.

Recommendation

No further action by GSH at this time is proposed for this building due to confirmation that chloroform, PCE, and TCE in soil vapor are adequately attenuated under the current use of the building.

3.7 BUILDING 596

Figure 8 shows the sample locations and layout of Building 596.

Building Properties and Usage

Building 596 is Tyson's maintenance and fabrication shop. Operations include storage, fabrication, and welding shops, as well as three office areas along the east wall. The main building is approximately 112 ft by 50 ft in size, with a small addition for washrooms on the south wall. There is also a large, covered, and partially enclosed work area along the south wall. This area is approximately 60 ft by 60 ft in size. The building is metal siding over steel frame and the floor is concrete slab on grade. The slab thickness measured during probe installation was 6.25 inches and, where visible, is in good condition. There is a lunchroom on the second floor in the northeast corner of the building. The lunchroom and offices have electric baseboard heating. The offices also have operable windows, and no air conditioning (AC) units are present. Ceilings are 10 ft in height, with the shop areas open to a ceiling height of 24 ft. A wall midway through the building separates the fabrication and welding shops from the storage area and offices, and a second interior wall separates the welding and fabrication shops. The welding shop has fume ventilation hoses. The offices are occupied for one 8-hour shift each day. Workers are normally present in the shop areas throughout the daytime 8-hour shift and for longer periods as required when fishing boats arrive. Vapors could potentially intrude into this building through cracks in the floor slab, unsealed utility penetrations, and un-caulked floor/wall or expansion joints.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

One SS vapor probe was installed where concurrent SS/IA samples were collected, as discussed below. One IA sample was collected to assess potential indoor sources of VOCs.

Sample pair SS/IA-3 was located within an occupied office space along the east side of the building. The office space shares a wall and doorway with a large storage and shop area to the west. The SS vapor probe was installed along the southern interior wall within the office at the northeastern corner of the building. Windows in this office were closed during the sampling event. During the pre-sampling survey, no obvious chemical storage was observed in this office. On the day of the sampling event, a can of carburetor cleaner fluid was observed on a shelf within the office space. The can was removed from the office during the sampling event and placed in the adjacent open-air shop area.

IA-21 was located within the storage/shop area. This sample was added to the investigation to identify and characterize the potential VOC contributions from the storage and use of chemicals in this area. The area contained numerous flammable storage lockers and stored chemicals including cleaners, and cutting oils on shelves near work stations. It was determined not feasible to move or isolate the chemicals and materials stored in this area and that this area may contribute to general IA VOC concentrations within the adjacent offices. Therefore, IA-21 was located in this area.

Sampling in Building 596 was initiated on April 21, 2013 with the 24-hour samples collected the following day. An OA sample was collected at adjacent Building 592 concurrent with both Building 592 and Building 596 sampling activities, and therefore the OA sample was used to represent OA conditions at both buildings. Weather conditions during sampling event were partly cloudy and calm, with winds from the west southwest, and no precipitation was observed.

Round Two

Indoor air and sub-slab vapor samples were collected at the same IA/SS sample locations as the round one event. One of the existing sample locations (IA-21) was in a centrally located position within the building in accordance with USEPA request. Prior to conducting the round two sampling event, a detailed survey was completed for Building 596, at which time the tenant was asked to fill out a questionnaire and provide MSDSs for all chemicals used or stored within the building. During the building

inventory and survey, the following target analytes were identified: xylene, 1,2,4-TMB, toluene, EB, naphthalene, BZ, PCE, and TCE. Adjacent to the south of the offices associated with sample location 3 is a tool and chemical storage and maintenance area. Copies of the submitted building survey questionnaire and MSDSs are included in Appendix A.

The indoor and ambient air sampling was initiated on June 24, 2013 using passive sampling equipment. The samples were collected 7 days later. Sub-slab sampling was conducted on June 27, 2013 with the 2-hour sample completed the same day. An associated OA sample for Building 592 (OA-1) was considered representative for this building as well.

Round Three

Indoor air and sub-slab vapor samples were collected at the same IA and IA/SS sample locations as the round one and two events, with the addition of one new sampling pair at location (SS/IA-35).

A site walk was conducted on February 7, 2014 to investigate potential preferential pathways specifically targeting utility penetrations. Mechanical, electrical, and plumbing are routed through numerous locations in this space, the observed floor penetrations all appeared sealed and in good condition. A separate sprinkler closet similar to those observed in Building 592 is located near the center of the building. An inspection of the utility penetrations in this closet revealed cuts in the floor have been sealed. No sampling was conducted in this closet space. Numerous cracks in the floor were observed throughout the building. Some of the cracks appear to have been sealed; however, the date of the floor sealing is unknown.

The SS/IA-32 was added to a small shop area near the southeastern corner of the building. This area is used for the maintenance and manufacture of fish processing equipment. Metal bending, shaping, cutting, welding, and grinding activities were noted in this area. Consistent with round one, during the building inventory and survey the following target analytes were identified: xylene, 1,2,4-TMB, toluene, EB, naphthalene, BZ, PCE, and TCE.

Sample pair SS/IA-3 is unchanged from round one. No obvious potential VOC emitters were observed in this area.

As with round one and two, an indoor air sample (IA-21) was collected from the tool and chemical storage room west of the office spaces in Building 596. The space appears unchanged from round two.

The indoor and ambient air sampling was initiated on March 11, 2014 using passive sampling equipment at OA-3P. However, a paired indoor sample at IA-21 was erroneously not deployed at this time. Prior to deploying the Summa canisters for the 24-hour sample collection, the error was detected and a passive sampler was deployed at IA-21P on March 14, a matched outdoor sampling badge was deployed on the west side of the building (OA-3AP). Sample OA-3P was retrieved on March 18, with the sampling pair IA-21p/OA-3AP retrieved on March 21, each 7 days after initial deployment. Sub-slab sampling was conducted on March 14 with the 2-hour samples completed the same day, 24-hour samples were collected the following day. An associated OA sample for this building (OA-3) was collected outside of the building.

Sampling Results

Round One

Analytical results are presented in Table 9 and detected parameters summarized on Figure 8.

IA concentrations of 1,4-DCB, BZ, CT, chloroform, naphthalene, PCE, and TCE exceeded IA screening levels.

The concentration of 1,4-DCB in indoor source characterization sample IA-21 ($2.7 \mu\text{g}/\text{m}^3$) exceeded the IA USEPA RSL ($1.1 \mu\text{g}/\text{m}^3$) while the concentration at IA-3 ($0.18 \mu\text{g}/\text{m}^3$) did not exceed. The SS and OA concentration ($0.027 \mu\text{g}/\text{m}^3$ for both) was lower than IA concentrations. It is therefore concluded that the IA USEPA RSL exceedance for 1,4-DCB is likely attributable to the indoor source.

IA concentrations of BZ (up to $1.1 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.32 \mu\text{g}/\text{m}^3$), and were higher than the OA concentration ($0.46 \mu\text{g}/\text{m}^3$) and the SS concentration ($0.18 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an indoor and possibly outdoor source.

IA concentrations of CT ($0.48 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.42 \mu\text{g}/\text{m}^3$), were slightly lower than the OA concentration ($0.50 \mu\text{g}/\text{m}^3$), and higher than the SS concentration (up to $0.32 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source.

The IA concentration of chloroform at IA-3 ($0.27 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.11 \mu\text{g}/\text{m}^3$), and was detected at lower concentrations in the SS sample ($0.041 \mu\text{g}/\text{m}^3$) and the OA sample ($0.077 \mu\text{g}/\text{m}^3$). It is therefore concluded that the IA MTCA screening level exceedance for chloroform at IA-3 is likely attributable to an indoor source.

The IA concentrations of naphthalene at IA-3 ($0.37 \mu\text{g}/\text{m}^3$) and IA-21 ($0.46 \mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL ($0.36 \mu\text{g}/\text{m}^3$), and was higher than in the paired SS-3 sample ($0.079 \mu\text{g}/\text{m}^3$) and the OA concentration ($0.11 \mu\text{g}/\text{m}^3$). It is therefore concluded that the IA USEPA RSL exceedances for naphthalene are likely attributable to the indoor source.

The concentration of PCE in indoor source characterization sample IA-21 ($12 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($9.6 \mu\text{g}/\text{m}^3$) while the concentration at IA-3 ($2.9 \mu\text{g}/\text{m}^3$) did not exceed. These results suggest the shop area and potential VOC emitters stored and used therein are likely contributing to the concentration observed in sample IA-3. The SS concentration of PCE at the paired sample SS-3 ($26 \mu\text{g}/\text{m}^3$), was higher than IA concentrations but below the SS screening levels. It is therefore concluded that the IA MTCA screening level exceedance for PCE is likely attributable to the identified potential source area (IA-21) and that the SS concentrations of PCE are being adequately attenuated.

The IA concentration of TCE at IA-3 ($6.6 \mu\text{g}/\text{m}^3$) and IA-21 ($19 \mu\text{g}/\text{m}^3$) exceeded the IA USEPA RSLs (3.0 and $8.8 \mu\text{g}/\text{m}^3$) and MTCA screening levels (0.61 and $0.91 \mu\text{g}/\text{m}^3$), and were higher than in the paired SS-3 sample ($0.26 \mu\text{g}/\text{m}^3$) and the OA concentration ($0.38 \mu\text{g}/\text{m}^3$). The TCE concentration observed in the potential source area IA-21 was higher than the TCE concentration measured at IA-3. These results suggest the shop area and potential VOC emitters stored and used therein are likely contributing to the indoor exceedance observed in sample IA-3. It is therefore concluded that the IA USEPA RSL and MTCA screening level exceedances for TCE are likely attributable to the indoor source. The TCE concentration at IA-21 ($19 \mu\text{g}/\text{m}^3$) exceeded the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$ and the concentration at IA-3 ($6.6 \mu\text{g}/\text{m}^3$) did not.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-3</i>	<i>IA-21</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>
1,1,1-Trichloroethane	µg/m ³	0.314	2.774
1,1-Dichloroethene	µg/m ³	-	0.017
1,2,4-Trimethylbenzene	µg/m ³	0.72	1.62
1,3,5-Trimethylbenzene	µg/m ³	0.3	0.52
1,4-Dichlorobenzene	µg/m ³	0.153	2.67 ^a
Benzene	µg/m ³	0.39 ^f	0.64 ^f
Carbon tetrachloride	µg/m ³	-0.02	-0.02
Chloroform (Trichloromethane)	µg/m ³	0.19 ^f	0.011
cis-1,2-Dichloroethene	µg/m ³	0.011	0.014
Ethylbenzene	µg/m ³	2.35	1.95
m&p-Xylenes	µg/m ³	8.93	7.63
Methylene chloride	µg/m ³	5.5	75
Naphthalene	µg/m ³	0.26	0.35
o-Xylene	µg/m ³	2.99	2.19
Styrene	µg/m ³	0.29	0.46
Tetrachloroethene	µg/m ³	2.77	11.87 ^f
Toluene	µg/m ³	9.5	23.5
trans-1,2-Dichloroethene	µg/m ³	0.025	0.14
Trichloroethene	µg/m ³	6.22 ^{afg}	18.62 ^{abefg}
Vinyl chloride	µg/m ³	0.0044	0.0048

As shown in the above table, the adjusted IA exceedances include 1,4-DCB, BZ, chloroform, PCE, and TCE at various locations. As noted previously, 1,4-DCB was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentrations by up to two orders of magnitude. The concentration in the adjusted IA (and unadjusted) sample associated with the sub-slab vapor sample was below screening levels. The IA exceedance is from a location near a suspected VOC source. Therefore, it may be concluded that the exceedances of 1,4-DCB in IA are unlikely attributable to sub-slab vapor. BZ was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentrations. The IA concentration of BZ near a suspected VOC source was greater than at the location further away. BZ was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of BZ in IA are unlikely attributable to sub-slab vapor. Chloroform was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentration. Chloroform was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedance of chloroform in IA is

unlikely attributable to sub-slab vapor. PCE was detected in the one sub-slab vapor sample at a concentration less than screening levels. The concentration in the adjusted IA (and unadjusted) sample associated with the sub-slab vapor sample was below screening levels. The IA exceedance is from a location near a suspected VOC source. PCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedance of PCE in IA is unlikely attributable to sub-slab vapor. TCE was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentrations by more than an order of magnitude. The IA concentration of TCE near a suspected VOC source was greater than at the location further away. TCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of TCE in IA are unlikely attributable to sub-slab vapor. As noted previously, BZ, PCE, and TCE were identified on MSDSs provided by the operator confirming the presence of these chemicals within the building.

In summary, it is concluded that IA screening level exceedances for 1,4-DCB, chloroform, naphthalene, PCE, and TCE are likely attributable to an indoor source (numerous flammable storage lockers and stored chemicals including cleaners, and cutting oils were observed). IA screening level exceedances for BZ are likely attributable to an indoor and possibly outdoor source. IA screening level exceedances for CT are likely attributable to an outdoor source. The TCE concentration at IA-21 ($19 \mu\text{g}/\text{m}^3$) exceeded the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$ and the concentration at IA-3 ($6.6 \mu\text{g}/\text{m}^3$) did not.

Round Two

Analytical results are presented in Table 9 and detected parameters summarized on Figure 8.

IA concentrations of 1,2,4-TMB, 1,4-DCB, BZ, EB, PCE, and TCE exceeded IA screening levels.

The concentration of 1,2,4-TMB in indoor source characterization sample IA-21 ($4.4 \mu\text{g}/\text{m}^3$) exceeded the IA MTCA screening level ($3.2 \mu\text{g}/\text{m}^3$) while the concentration at IA-3 ($2.2 \mu\text{g}/\text{m}^3$) did not exceed. The OA concentration ($0.35 \mu\text{g}/\text{m}^3$) was lower than IA concentrations and 1,2,4-TMB was not detected in SS. It is therefore concluded that the IA MTCA screening level exceedance for 1,2,4-TMB is likely attributable to the indoor source.

The concentration of 1,4-DCB in indoor source characterization sample IA-21 ($6.5 \mu\text{g}/\text{m}^3$) exceeded the IA USEPA RSL ($1.1 \mu\text{g}/\text{m}^3$) while the concentration at IA-3 ($1.1 \mu\text{g}/\text{m}^3$) did not exceed. The SS concentration ($0.046 \mu\text{g}/\text{m}^3$) was lower than IA concentrations and 1,4-DCB was not detected in OA. It is therefore concluded that the IA USEPA RSL exceedance for 1,4-DCB is likely attributable to the indoor source.

IA concentrations of BZ (up to $1.3 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.32 \mu\text{g}/\text{m}^3$), and were higher than the OA concentration ($0.6 \mu\text{g}/\text{m}^3$) and the SS concentration ($0.54 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an indoor and possibly outdoor source.

IA concentrations of EB (up to $9.9 \mu\text{g}/\text{m}^3$) exceeded the IA USEPA RSL ($4.9 \mu\text{g}/\text{m}^3$), and were higher than the OA concentration ($0.5 \mu\text{g}/\text{m}^3$) and the SS concentration ($0.53 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for EB are likely attributable to an indoor source(s).

The concentration of PCE in indoor source characterization sample IA-21 ($13 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($9.6 \mu\text{g}/\text{m}^3$) while the concentration at IA-3 ($3.0 \mu\text{g}/\text{m}^3$) did not exceed. These results suggest the chemical storage area and potential VOC emitters stored and used therein are likely contributing to the concentration observed in sample IA-21. The SS concentration of PCE at the paired sample SS-3 ($35 \mu\text{g}/\text{m}^3$), was higher than IA concentrations but below the SS screening levels. It is therefore concluded that the IA MTCA screening level exceedance for PCE is likely attributable to the identified potential source area (IA-21) and that the SS concentrations of PCE are being adequately attenuated.

The IA concentration of TCE at IA-3 ($2.9 \mu\text{g}/\text{m}^3$) and IA-21 ($15 \mu\text{g}/\text{m}^3$) exceeded one or more of the IA USEPA RSLs (3.0 and $8.8 \mu\text{g}/\text{m}^3$) and MTCA screening levels (0.61 and $0.91 \mu\text{g}/\text{m}^3$), and were higher than in the paired SS-3 sample ($0.15 \mu\text{g}/\text{m}^3$) and the OA concentration ($0.48 \mu\text{g}/\text{m}^3$). The TCE concentration observed in the potential source area IA-21 was higher than the TCE concentration measured at IA-3. These results suggest the shop area and potential VOC emitters stored and used therein are likely contributing to the indoor exceedance observed in sample IA-3. It is therefore concluded that the IA USEPA RSL and MTCA screening level exceedances for TCE are likely attributable to the indoor source. The TCE concentration at IA-21 ($15 \mu\text{g}/\text{m}^3$) exceeded the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$ and the concentration at IA-3 ($2.9 \mu\text{g}/\text{m}^3$) did not.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA). Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-3</i>	<i>IA-21</i>
<i>Volatile Organic Compounds</i>		<i>- OA-1</i>	<i>- OA-1</i>
1,1,1-Trichloroethane	µg/m ³	0.34	0.65
1,2,4-Trimethylbenzene	µg/m ³	1.85	4.05 ^g
1,4-Dichlorobenzene	µg/m ³	1.1	6.5 ^a
Benzene	µg/m ³	0.7 ^f	0.22
Ethylbenzene	µg/m ³	7.9 ^a	9.4 ^a
m&p-Xylenes	µg/m ³	30.2	35.2
o-Xylene	µg/m ³	11.34	12.34
Styrene	µg/m ³	1.37	1.77
Tetrachloroethene	µg/m ³	2.93	12.93 ^f
Toluene	µg/m ³	18.6	35.6
Trichloroethene	µg/m ³	2.42 ^g	14.52 ^{abefg}

As shown in the above table, the adjusted IA exceedances include 1,2,4-TMB, 1,4-DCB, BZ, EB, PCE, and TCE at various locations. As noted previously, 1,2,4-TMB was not detected in the one sub-slab vapor sample. The concentration in the adjusted IA (and unadjusted) sample associated with the sub-slab vapor sample was below screening levels. The IA exceedance is from a location near a suspected VOC source. Therefore, it may be concluded that the exceedances of 1,2,4-TMB in IA are unlikely attributable to sub-slab vapor. 1,4-DCB was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentrations by up to two orders of magnitude. The concentration in the adjusted IA (and unadjusted) sample associated with the sub-slab vapor sample was below screening levels. The IA exceedance is from a location near a suspected VOC source. Therefore, it may be concluded that the exceedances of 1,4-DCB in IA are unlikely attributable to sub-slab vapor. BZ was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than the associated adjusted IA concentration. BZ was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of BZ in IA are unlikely attributable to sub-slab vapor. EB was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentrations by one order of magnitude. EB was detected in the nearby groundwater sample but at several orders of magnitude below screening levels. Therefore it may be concluded that the exceedance of EB in IA is unlikely attributable to sub-slab vapor. PCE was detected in

the one sub-slab vapor sample at a concentration less than screening levels. The concentration in the adjusted IA (and unadjusted) sample associated with the sub-slab vapor sample was below screening levels. The IA exceedance is from a location near a suspected VOC source. PCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedance of PCE in IA is unlikely attributable to sub-slab vapor. TCE was detected in the one sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentrations by more than an order of magnitude. The IA concentration of TCE near a suspected VOC source was greater than at the location further away. TCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of TCE in IA are unlikely attributable to sub-slab vapor. As noted previously, 1,2,4-TMB, BZ, EB, PCE, and TCE were identified on MSDSs provided by the operator confirming the presence of these chemicals within the building.

In summary, it is concluded that IA screening level exceedances for 1,2,4-TMB, 1,4-DCB, EB, PCE, and TCE are likely attributable to an indoor source (numerous flammable storage lockers and stored chemicals including cleaners, and cutting oils were observed). IA screening level exceedances for BZ are likely attributable to an indoor and possibly outdoor source. The TCE concentration at IA-21 ($15 \mu\text{g}/\text{m}^3$) exceeded the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$ and the concentration at IA-3 ($2.9 \mu\text{g}/\text{m}^3$) did not.

Round Three

Analytical results are presented in Table 9 and detected parameters summarized on Figure 8.

IA concentrations of 1,4-DCB, BZ, CT, chloroform, EB, naphthalene, and TCE exceeded IA screening levels in round three.

The IA concentration of 1,4-DCB in indoor source characterization passive sample IA-21P was estimated at $1.4 \mu\text{g}/\text{m}^3$ from a 7-day exposure and marginally exceeded the IA USEPA RSL ($1.1 \mu\text{g}/\text{m}^3$). The paired 24-hour Summa canister sample IA-21 concentration ($0.73 \mu\text{g}/\text{m}^3$) is below the screening level. The two other IA sample concentrations were lower (IA-3, $0.34 \mu\text{g}/\text{m}^3$; and IA-35, $0.052 \mu\text{g}/\text{m}^3$). The OA concentrations were lower for the 24-hour Summa canister sample OA-3 ($0.026 \mu\text{g}/\text{m}^3$) and the passive samples OA-3AP ($0.026 \mu\text{g}/\text{m}^3$, duplicate $0.044 \mu\text{g}/\text{m}^3$). The two SS concentrations (up to $0.032 \mu\text{g}/\text{m}^3$) were also lower. It is therefore concluded that the IA USEPA RSL exceedance for 1,4-DCB is likely attributable to the identified indoor source.

IA concentrations of BZ (up to 1.4 $\mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level (0.32 $\mu\text{g}/\text{m}^3$), and were higher than the OA concentration (0.67 $\mu\text{g}/\text{m}^3$). BZ was not detected in the SS samples. The IA concentration of BZ in indoor source characterization sample IA-21 was 1.3 $\mu\text{g}/\text{m}^3$. It is therefore concluded that IA MTCA screening level exceedances for BZ are likely attributable to an indoor and possibly outdoor source.

IA concentrations of CT (up to 0.47 $\mu\text{g}/\text{m}^3$) marginally exceeded an IA MTCA screening level (0.42 $\mu\text{g}/\text{m}^3$), and were similar to the OA concentration (0.43 $\mu\text{g}/\text{m}^3$). The SS concentrations (up to 0.29 $\mu\text{g}/\text{m}^3$) were lower. The IA concentration of CT in indoor source characterization sample IA-21 was 0.46 $\mu\text{g}/\text{m}^3$, similar to the OA concentration. The IA concentration is below the screening levels when the OA concentration is subtracted. It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source.

IA concentrations of chloroform at IA-3 (0.13 $\mu\text{g}/\text{m}^3$) marginally exceeded an IA MTCA screening level (0.11 $\mu\text{g}/\text{m}^3$) and was higher than the concentrations at other IA locations (up to 0.086 $\mu\text{g}/\text{m}^3$) and OA location (0.086 $\mu\text{g}/\text{m}^3$). The paired SS-3 concentration (0.046 $\mu\text{g}/\text{m}^3$) is below screening levels consistent with previous sampling rounds and less than the IA and OA concentrations. The IA concentration is below the screening levels when the OA concentration is subtracted. It is therefore concluded that IA MTCA screening level exceedance for chloroform is likely attributable an outdoor source.

The IA concentration of EB in indoor source characterization passive sample IA-21P was estimated at 5.4 $\mu\text{g}/\text{m}^3$ from a 7-day exposure and exceeded the IA USEPA RSL (4.9 $\mu\text{g}/\text{m}^3$). The paired 24-hour Summa canister sample IA-21 concentration (4.9 $\mu\text{g}/\text{m}^3$) is the same as the screening level. The IA concentration of EB at IA-35 (5.5 $\mu\text{g}/\text{m}^3$) exceeded the IA USEPA RSL (4.9 $\mu\text{g}/\text{m}^3$) and at IA-3 (4.8 $\mu\text{g}/\text{m}^3$) did not. Both concentrations were similar to the source characterization concentrations. The OA concentrations were lower, ranging from 1.4 $\mu\text{g}/\text{m}^3$ (IA-3P, passive sample) to 4.2 $\mu\text{g}/\text{m}^3$ (IA-3, Summa canister sample). The two SS concentrations (up to 0.073 $\mu\text{g}/\text{m}^3$) were two orders of magnitude lower. It is therefore concluded that IA USEPA RSL exceedances for EB are likely attributable to indoor and outdoor sources.

The IA concentration of naphthalene at IA-3 was 0.70 $\mu\text{g}/\text{m}^3$ and was similar to the concentration at indoor source characterization location IA-21 (0.71 $\mu\text{g}/\text{m}^3$). Both concentrations exceeded the IA USEPA RSL (0.36 $\mu\text{g}/\text{m}^3$) and were higher than the OA concentration (0.15 $\mu\text{g}/\text{m}^3$). The other IA concentration (0.24 $\mu\text{g}/\text{m}^3$) and the SS concentrations (up to 0.16 $\mu\text{g}/\text{m}^3$) were lower. It is therefore concluded that IA USEPA RSL exceedances for naphthalene are likely attributable to an indoor source.

The concentration of TCE in indoor source characterization sample IA-21 (Summa canister, 7.1 µg/m³ and passive sample, 4.8 J µg/m³) was the highest measured and exceeded IA MTCA screening levels (0.61 and 0.91 µg/m³) and an IA USEPA RSL (3 µg/m³). The other IA concentrations (up to 2.8 µg/m³) exceeded IA MTCA screening levels, but not the IA USEPA RSLs and were an order of magnitude higher than the OA concentration (0.20 µg/m³). The two SS concentrations (up to 0.13 J µg/m³) were one to two orders of magnitude lower than IA. These results suggest the chemical storage area and potential VOC emitters stored and used therein are likely contributing to the concentration observed in sample IA-21 and elsewhere. It is therefore concluded that the IA USEPA RSL and MTCA screening level exceedances for TCE are likely attributable to the indoor source. The TCE concentrations in IA did not exceed the short-term criterion of 8.4 µg/m³.

SS concentrations of chloroform at SS-35 (2.6 µg/m³) exceeded the MTCA screening level 1.1 µg/m³. The paired IA-35 concentration (0.083 J µg/m³) is below screening levels. These data suggest the detection of the chloroform at SS-35 is being adequately attenuated.

The analytical results for the IA passive samples were generally similar to the Summa canister collected at the same location for IA and OA.

The following table presents the difference between measured IA concentrations and measured OA concentrations (adjusted IA) for the summa canisters and passive sampler. Not detected results for OA sample were assumed as zero.

<i>Detected</i>		<i>IA-3</i>	<i>IA-21</i>	<i>IA-35</i>	<i>IA-21p</i>
<i>Volatile Organic Compounds</i>		<i>- OA-3</i>	<i>- OA-3</i>	<i>- OA-3</i>	<i>- OA-3Ap</i>
1,1,1-Trichloroethane	µg/m ³	0.629	0.769	0.076	0.974
1,1,2,2-Tetrachloroethane	µg/m ³	0.00	-0.001	0.001	-
1,1,2-Trichloroethane	µg/m ³	0.00	0.00	0.01	-
1,1-Dichloroethene	µg/m ³	0.00	-0.028	0.001	-
1,2,4-Trichlorobenzene	µg/m ³	0.00	-0.001	0.001	-
1,2,4-Trimethylbenzene	µg/m ³	0.88	0.88	0.15	0.95
1,3,5-Trimethylbenzene	µg/m ³	0.27	0.25	0.03	-
1,4-Dichlorobenzene	µg/m ³	0.314	0.704	0.026	1.356 ^a
Benzene	µg/m ³	0.73 ^f	0.63 ^f	0.13	0.34 ^f
Carbon tetrachloride	µg/m ³	0.04	0.03	0.03	-
Chloroform (Trichloromethane)	µg/m ³	0.044	-0.001	-0.003	-

<i>Detected</i>		<i>IA-3</i>	<i>IA-21</i>	<i>IA-35</i>	<i>IA-21p</i>
<i>Volatile Organic Compounds</i>		<i>- OA-3</i>	<i>- OA-3</i>	<i>- OA-3</i>	<i>- OA-3Ap</i>
cis-1,2-Dichloroethene	µg/m ³	-0.004	-0.009	-0.013	
Ethylbenzene	µg/m ³	0.6	0.7	1.3	3.6
Hexachlorobutadiene	µg/m ³	0.00	-0.001	0.001	-
m&p-Xylenes	µg/m ³	1.0	2.0	4.0	6.5
Methylene chloride	µg/m ³	10.61	25.61	2.21	-
Naphthalene	µg/m ³	0.55 ^a	0.56 ^a	0.09	-
o-Xylene	µg/m ³	0.7	0.5	1.2	5.1
Styrene	µg/m ³	0.32	0.25	-0.06	0.17
Tetrachloroethene	µg/m ³	1.02	2.42	0.37	1.88
Toluene	µg/m ³	7.5	11.0	1.4	7.0
trans-1,2-Dichloroethene	µg/m ³	0.015	0.092	-0.009	-
Trichloroethene	µg/m ³	2.6 ^{fg}	6.9 ^{afg}	1.3 ^{fg}	4.7 ^{afg}
Vinyl chloride	µg/m ³	-0.004	-0.007	-0.006	-

As shown in the above table, the adjusted IA exceedances include 1,4-DCB, BZ, naphthalene, and TCE at various locations. The 1,4-DCB exceedance was for the passive sample. The concentration in the Summa canister sample was below the screening levels. 1,4-DCB was detected in both sub-slab vapor samples at a concentration less than screening levels and additionally less than adjusted IA concentrations by up to two orders of magnitude. The IA exceedance is from a location near a suspected VOC source. Therefore, it may be concluded that the exceedances of 1,4-DCB in IA are unlikely attributable to sub-slab vapor. BZ was not detected sub-slab vapor samples during round three. The BZ exceedances are near a suspected VOC source and the concentration further away is below the screening levels. BZ was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of BZ in IA are unlikely attributable to sub-slab vapor. Naphthalene was detected in both sub-slab vapor samples at a concentration less than screening levels and additionally less than the associated adjusted IA concentration. The naphthalene exceedances are near a suspected VOC source and the concentration further away is below the screening levels. Therefore it may be concluded that the exceedance of naphthalene in IA is unlikely attributable to sub-slab vapor. TCE was detected in both sub-slab vapor sample at a concentration less than screening levels and additionally less than adjusted IA concentrations by more than an order of magnitude. The IA concentration of TCE near a suspected VOC source was greater than at the locations further away. TCE was not detected in the nearby groundwater sample. Therefore it may be concluded that the exceedances of TCE in IA are unlikely attributable to sub-slab vapor. As noted

previously, BZ and TCE were identified on MSDSs provided by the operator confirming the presence of these chemicals within the building.

In summary, it is concluded that IA screening level exceedances for 1,4-DCB, naphthalene, and TCE are likely attributable to an indoor source (numerous flammable storage lockers and stored chemicals including cleaners, and cutting oils were observed). IA screening level exceedances for BZ and EB are likely attributable to an indoor and possibly outdoor source. IA screening level exceedances for CT and chloroform are likely attributable to an outdoor source. The TCE concentrations at IA-21 (7.1 µg/m³), IA-3 (2.8 µg/m³), and IA-35 (1.5 µg/m³) are below the short-term criterion of 8.4 µg/m³.

Round One and Round Two Comparison

The following table presents a side-by-side comparison of the round one and round two sub-slab vapor data.

		<i>Round One</i>	<i>Round Two</i>
<i>Volatile Organic Compounds</i>		<i>SS-3</i>	<i>SS-3</i>
1,1,1-Trichloroethane	µg/m ³	0.70	0.74
1,1,2,2-Tetrachloroethane	µg/m ³	0.039 U	0.038 U
1,1,2-Trichloroethane	µg/m ³	0.0060 J	0.15 U
1,1-Dichloroethene	µg/m ³	0.039 U	0.015 J
1,2,4-Trichlorobenzene	µg/m ³	0.039 U	0.038 U
1,2,4-Trimethylbenzene	µg/m ³	0.78 U	0.76 U
1,3,5-Trimethylbenzene	µg/m ³	0.78 U	0.76 U
1,4-Dichlorobenzene	µg/m ³	0.027 J	0.046
Benzene	µg/m ³	0.18	0.54
Carbon tetrachloride	µg/m ³	0.32	0.31
Chloroform (Trichloromethane)	µg/m ³	0.041 J	0.079 J
cis-1,2-Dichloroethene	µg/m ³	0.039 U	0.038 U
Ethylbenzene	µg/m ³	0.081 J	0.53
Hexachlorobutadiene	µg/m ³	0.097	0.038 U
m&p-Xylenes	µg/m ³	0.31	1.8
Methylene chloride	µg/m ³	0.78 UJ	0.59
Naphthalene	µg/m ³	0.079 J	0.32
o-Xylene	µg/m ³	0.12 J	0.70
Styrene	µg/m ³	0.78 U	0.55 J
Tetrachloroethene	µg/m ³	26	35
Toluene	µg/m ³	0.34 J	2.5

<i>Volatile Organic Compounds</i>		<i>Round One</i>	<i>Round Two</i>
		<i>SS-3</i>	<i>SS-3</i>
trans-1,2-Dichloroethene	µg/m ³	0.039 U	0.038 U
Trichloroethene	µg/m ³	0.26	0.15
Vinyl chloride	µg/m ³	0.039 U	0.038 U

At SS-3, the reported concentrations for the round two sample are similar to the reported concentrations for the round one sample. Variability for the parameters detected above one ppbv includes slight increases in concentrations in round two for m&p-xylenes and toluene, and increase in concentration in round two for PCE. These data suggest limited variability of concentrations over time. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,2,4-TCB, 1,2,4-TMB, 1,3,5-TMB, cis-1,2-DCE, trans-1,2-DCE, and VC.

The following table presents a side-by-side comparison of the round one (Summa canister) and round two (passive sampler) indoor air data.

<i>Volatile Organic Compounds</i>		<i>Round One</i>	<i>Round Two</i>	<i>Round One</i>	<i>Round Two</i>
		<i>IA-3</i>	<i>IA-3</i>	<i>IA-21</i>	<i>IA-21</i>
1,1,1-Trichloroethane	µg/m ³	0.34	0.34	2.8	0.65
1,2,4-Trimethylbenzene	µg/m ³	1.0	2.2	1.9	4.4
1,4-Dichlorobenzene	µg/m ³	0.18	1.1	2.7	6.5
Benzene	µg/m ³	0.85	1.3	1.1	0.82
Ethylbenzene	µg/m ³	2.6	8.4	2.2	9.9
m&p-Xylenes	µg/m ³	9.8	32 J	8.5	37 J
o-Xylene	µg/m ³	3.3	12	2.5	13
Styrene	µg/m ³	0.29 J	1.8	0.46 J	2.2
Tetrachloroethene	µg/m ³	2.9	3.0	12	13
Toluene	µg/m ³	11	20 J	25	37 J
Trichloroethene	µg/m ³	6.6	2.9	19	15 J

At IA-3, the reported concentrations for the round two sample are similar for 1,1,1-TCA, 1,2,4-TMB, 1,4-DCB, BZ, and PCE, greater than for EB, xylenes, styrene, and toluene, and less than for TCE with respect to the reported concentrations for the round one sample. At IA-21, the reported concentrations for the round two sample are similar for BZ and PCE, greater than for 1,2,4-TMB, 1,4-DCB, EB, xylenes, styrene, and toluene, and less than for 1,1,1-TCA and TCE with respect to the reported concentrations for the round one sample. The Summa canisters were deployed over a 24-hour period and the passive samplers were deployed over a 7-day period on a different date. These data suggest

some variability of concentrations over time. This is inconsistent with the comparison of SS samples that indicate limited variability. The greater variability in the IA samples may be a result of variations in emissions from other potential sources unrelated to the OCC site.

Rounds One and Round Three Comparison

The following table presents a side-by-side comparison of the round one and round three sub-slab vapor data.

		<i>Round One</i>	<i>Round Three</i>
<i>Volatile Organic Compounds</i>		<i>SS-3</i>	<i>SS-3</i>
1,1,1-Trichloroethane	µg/m ³	0.70	0.45
1,1,2,2-Tetrachloroethane	µg/m ³	0.039 U	0.039 U
1,1,2-Trichloroethane	µg/m ³	0.0060 J	0.16 U
1,1-Dichloroethene	µg/m ³	0.039 U	0.039 U
1,2,4-Trichlorobenzene	µg/m ³	0.039 U	0.039 U
1,2,4-Trimethylbenzene	µg/m ³	0.78 U	0.069 J
1,3,5-Trimethylbenzene	µg/m ³	0.78 U	0.023 J
1,4-Dichlorobenzene	µg/m ³	0.027 J	0.032 J
Benzene	µg/m ³	0.18	0.12 U
Carbon tetrachloride	µg/m ³	0.32	0.29
Chloroform (Trichloromethane)	µg/m ³	0.041 J	0.046 J
cis-1,2-Dichloroethene	µg/m ³	0.039 U	0.028 J
Ethylbenzene	µg/m ³	0.081 J	0.037 J
Hexachlorobutadiene	µg/m ³	0.097	0.039 U
m&p-Xylenes	µg/m ³	0.31	0.15 J
Methylene chloride	µg/m ³	0.78 UJ	0.16 U
Naphthalene	µg/m ³	0.079 J	0.16
o-Xylene	µg/m ³	0.12 J	0.054 J
Styrene	µg/m ³	0.78 U	0.073 J
Tetrachloroethene	µg/m ³	26	28
Toluene	µg/m ³	0.34 J	0.098 J
trans-1,2-Dichloroethene	µg/m ³	0.039 U	0.039 U
Trichloroethene	µg/m ³	0.26	0.077
Vinyl chloride	µg/m ³	0.039 U	0.039 U

At SS-3, the reported concentrations for the round three sample are similar to the reported concentrations for the round one sample. Variability for the parameters

detected above 1 ppbv include a slight increase in concentration in round three for PCE. These data suggest limited variability of concentrations over time and temporal effects. The parameters that were not detected in both rounds of sampling include 1,1,2,2-PCA, 1,1-DCE, 1,2,4-TCB, MC, trans-1,2-DCE, and VC.

The following table presents a side-by-side comparison of the round one and round three Summa canister indoor air data.

<i>Volatile Organic Compounds</i>		<i>Round One</i>	<i>Round Three</i>	<i>Round One</i>	<i>Round Three</i>
		<i>IA-3</i>	<i>IA-3</i>	<i>IA-21</i>	<i>IA-21</i>
1,1,1-Trichloroethane	µg/m ³	0.34	0.65	0.038 U	0.79
1,1,2,2-Tetrachloroethane	µg/m ³	0.041 U	0.038 U	0.15 U	0.037 U
1,1,2-Trichloroethane	µg/m ³	0.17 U	0.15 U	0.017 J	0.15 U
1,1-Dichloroethene	µg/m ³	0.041 U	0.038 U	0.038 U	0.010 J
1,2,4-Trichlorobenzene	µg/m ³	0.041 U	0.038 U	1.9	0.037 U
1,2,4-Trimethylbenzene	µg/m ³	1.0	1.2	0.52 J	1.2
1,3,5-Trimethylbenzene	µg/m ³	0.30 J	0.37	2.7	0.35
1,4-Dichlorobenzene	µg/m ³	0.18	0.34	1.1	0.73
Benzene	µg/m ³	0.85	1.4	0.48	1.3
Carbon tetrachloride	µg/m ³	0.48	0.47	0.088 J	0.46
Chloroform (Trichloromethane)	µg/m ³	0.27	0.13 J	0.035 J	0.085 J
cis-1,2-Dichloroethene	µg/m ³	0.032 J	0.051	2.2	0.046
Ethylbenzene	µg/m ³	2.6	4.8	0.038 U	4.9
Hexachlorobutadiene	µg/m ³	0.041 U	0.038 U	8.5	0.037 U
m&p-Xylenes	µg/m ³	9.8	18	75 J	19
Methylene chloride	µg/m ³	5.5 J	11	0.46	26
Naphthalene	µg/m ³	0.37	0.70	2.5	0.71
o-Xylene	µg/m ³	3.3	5.6	0.46 J	5.4
Styrene	µg/m ³	0.29 J	0.55	12	0.48
Tetrachloroethene	µg/m ³	2.9	1.2	25	2.6
Toluene	µg/m ³	11	9.5	0.038 U	13
trans-1,2-Dichloroethene	µg/m ³	0.025 J	0.053	0.14 J	0.13
Trichloroethene	µg/m ³	6.6	2.8	19	7.1
Vinyl chloride	µg/m ³	0.0044 J	0.021 J	0.0048 J	0.018 J

At IA-3, the reported concentrations for the round three samples are generally greater than or similar to the reported concentrations for the round one samples with a few exceptions. Variability for the parameters detected above 1 ppbv includes: decreases in concentrations in round three for PCE, toluene, and TCE; and increases for 1,2,4-TMB,

BZ, EB, m&p-xylenes, MC, and o-xylene. At IA-21, the reported concentrations for the round three samples are variable compared to the reported concentrations for the round one samples. Variability for the parameters detected above 1 ppbv includes: decreases in concentrations in round three for 1,2,4-TCB, 1,3,5-TMB, 1,4-DCB, cis-1,2-DCE, HCB, m&p-xylenes, naphthalene, styrene, PCE, and TCE; and increases for 1,2,4-TMB, BZ, EB, MC, o-xylene, and toluene. The OA concentrations for the round three samples are generally less than or similar to the reported concentrations for the round one samples. The parameter 1,1,2,2-PCA was not detected in both rounds of sampling.

The variability of the IA data is inconsistent with the generally consistent results for SS and results for OA between sampling rounds. The observed variability is indicative of variable emissions likely from an indoor source unrelated to the OCC site.

Additional Analysis of the Data

The sub-slab concentrations may be contributing to indoor air concentrations via the vapor intrusion pathway. However, the contributions would not be significant for the parameters that were detected in sub-slab samples at concentrations below the cancer screening values and below HQs, and in some cases below indoor air concentrations.

The following is a discussion of the most recent, shallowest, and nearby groundwater and soil data presented in Table 9 with respect to SS analytical results. PCE and TCE were not detected in a recent (2012) shallow groundwater sample collected from location 71-25, representing the most recent, shallowest, and nearby groundwater data. Other parameters that were detected in sub-slab air samples but were not detected in groundwater include 1,1-DCE, BZ, CT, chloroform, MC, o-xylene, toluene, and TCE. Parameters detected in the sub-slab air samples and groundwater include EB and m&p-xylenes. The remaining detected parameters in sub-slab air samples were not reported for groundwater sample.

The following discusses a comparison of the analytical results to non-cancer screening levels for chronic exposures at values that represent a hazard quotient of 0.1 (adjusted HQ) except for TCE for purposes of evaluating short-term exposures to women of reproductive age. RLs are above the EPA RSL adjusted HQ for 1,1,2-TCA for indoor air. The RLs for 1,1,2-TCA are less than 20 percent of the EPA RSL HQ and would not contribute to a cumulative HI since the results are non-detect. Concentrations exceed the EPA RSL adjusted HQs for 1,2,4-TMB and TCE for indoor air. The exceedances for 1,2,4-TMB and TCE have been concluded to be attributed to an indoor source since the sub-slab concentrations are lower and do not exceed the adjusted HQs. These two parameters have different primary target organs (blood system and developmental

effects). There are no exceedances of EPA RSL adjusted HQs for sub-slab results. Since no detected concentrations exceed the EPA RSL adjusted HQs, cumulative non-cancer health effects would be less than a HI of 1. Concentrations exceed the MTCA adjusted HQs for 1,2,4-TMB, MC, naphthalene, o-xylene, PCE, and TCE for indoor air. The concentrations of 1,2,4-TMB, MC, naphthalene, o-xylene, and TCE have been concluded to be attributable to indoor sources since the sub-slab concentrations are lower and do not exceed the adjusted HQs. The concentrations of PCE have been concluded to be attributable to potential VOC emitters in the shop area. There are no exceedances of MTCA adjusted HQs for sub-slab results except PCE. The parameters have a different primary target organs; 1,2,4-TMB (blood system), MC (liver), naphthalene and o-xylene (body weight), PCE (central nervous system), and TCE (developmental effects). The exceedances for PCE are less than 20 percent of the EPA RSL HQ and would not contribute to a cumulative primary target organ HI greater than 1. The above discussion is applicable to the round three data since the round three results are generally similar to the round one results as discussed above.

Recommendation

No further action by GSH is proposed for this building due to the identified indoor sources and apparent outdoor source unrelated to the OCC Site based on the data presented herein.

3.8 GUARD SHACK

Figure 9 shows the sample location and layout of the Guard Shack.

Building Properties and Usage

The Guard Shack is occupied full time. The building covers approximately 100 square ft and houses a small office space for security operation and a small bathroom. The building is steel siding over wood frame construction on a concrete slab. The concrete slab was not visible during the inspection or sampling event; however, the relatively new age of the building suggests it should be in good condition. No SS probe was advanced at this location so slab thickness was not determined.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

IA-14 was located within the office occupied by TOTE security personnel. The number of potential utility conflicts prevented an accurate utility clearance from being completed. Therefore it was determined that a SS probe could not be safely advanced at this building. Consultation with POT and USEPA representatives concluded that the SS sample could be removed from the sampling plan. No obvious potential VOC emitters were observed at this location.

Sampling in the Guard Shack was initiated on April 23, 2013 with the 24-hour samples completed the following day. Weather conditions during the sampling event were partly cloudy and calm, with winds from the south, and no precipitation was observed. The associated OA sample (OA-14) was collected near the southeast corner of the Guard Shack.

Round Two

Discussions with the USEPA and POT during the June 11, 2013 conference call resulted in the decision to exclude the Guard Shack from the round two sampling event. A consensus among the investigation team that additional investigation was not warranted based on the round one data, the location of the Guard Shack relative to the main plume, and the nature of the day-to-day operations at this location.

Round Three

The Guard shack was not included in the round three sampling event for the reasons stated above.

Sampling Results

Round One

Analytical results are presented in Table 10 and detected parameters summarized on Figure 9.

IA concentrations of BZ ($0.79 \mu\text{g}/\text{m}^3$) and CT ($0.47 \mu\text{g}/\text{m}^3$) exceeded IA MTCA screening levels ($0.32 \mu\text{g}/\text{m}^3$ for BZ and $0.42 \mu\text{g}/\text{m}^3$ for CT), and were similar to OA concentrations ($0.75 \mu\text{g}/\text{m}^3$ for BZ and $0.43 \mu\text{g}/\text{m}^3$ for CT). It is therefore concluded that IA MTCA screening level exceedances for BZ and CT are likely attributable to an outdoor source.

Additional Analysis of the Data

The following discusses a comparison of the analytical results to non-cancer screening levels for chronic exposures at values that represent a hazard quotient of 0.1 (adjusted HQ) except for TCE for purposes of evaluating short-term exposures to women of reproductive age. A RL is above the EPA RSL adjusted HQ for 1,1,2-TCA for indoor air. The RL for 1,1,2-TCA is less than 20 percent of the EPA RSL HQ and would not contribute to a cumulative HI since the result is non-detect. Concentrations exceed the MTCA adjusted HQs for 1,2,4-TMB and naphthalene for indoor air. The parameter 1,2,4-TMB has a different primary target organ (blood system) than naphthalene (body weight). The concentrations are less than 25 percent of the MTCA HQs and would not contribute to a cumulative primary target organ HIs greater than 1.

Recommendation

No further action by GSH is proposed for this building, due to the apparent outdoor source unrelated to the OCC Site based on the data presented herein, the location of the Guard Shack relative to the main plume, and the nature of the day-to-day operations at this location.

3.9 OCC OFFICE BUILDING

Figure 10 shows the sample locations and layout of the OCC Office Building.

Building Properties and Usage

The OCC Office Building is used for occasional office work and meetings, and full time for records retention, and is built on a concrete slab foundation. The building is separated into several areas including an office area, conference room, shower room, file room, bathroom, hallways, and kitchen area. The office space is used very infrequently and when used it is occupied for shifts shorter than 8 hours. The shower facilities are used periodically throughout the week. The building layout consists of a 30-ft by 40-ft wing housing the office, copier room, conference room, and kitchen area that is joined to an older 24-ft by 80-ft block building that contains a climate controlled document storage area (file room) in the southern half of the building. The building has a HVAC system. The concrete slab was measured to be 8 inches thick in the office area and 6.5 inches thick in the file room area.

Sampling Location Rationale and Pre-Sampling Survey Results

Round One

Two SS vapor probes were installed where concurrent SS/IA samples were collected, as discussed below.

Sample pair SS/IA-15 was located within the office area, which consists of a conference room, large office, cubicle area, bathroom, kitchen, and mechanical closet. The SS probe was installed in the entryway between the larger office and cubicle space. During the pre-sampling survey, a small number of cleaning products were observed in the kitchen area. The products were removed prior to sampling. During sampling, no obvious potential VOC emitters were observed in this location.

Sample pair SS/IA-16 was located within the shower and file room areas. The SS vapor probe was installed just south of the doorway between the shower room and file area. The IA sample was collected at this same location within the file room. During the pre-sampling survey, a small number of cleaning products were observed in the shower room area. The products were removed and stored off Site prior to sampling. During sampling, no obvious potential VOC emitters were observed in this location.

Sampling in the OCC Office Building was initiated on April 17, 2013 with the 24-hour samples completed the following day. The associated OA sample (OA-15) was collected along the western wall of the office building approximately 5 ft north of the southwestern corner. Weather conditions during the sampling event were partly cloudy and calm, with winds from the southwest, and no precipitation was observed.

Round Two

The OCC Office Building was not included in the round two sampling event based on the assessment of the round one sampling results described below and an understanding the office space is very rarely occupied and additional ventilation measures would be conducted prior to any prolonged occupation by sensitive personal.

Round Three

The OCC Office Building is scheduled for mitigation as discussed below and was excluded from the round three sampling event.

Sampling Results

Round One

Analytical results are presented in Table 11 and detected parameters summarized on Figure 10.

IA concentrations of 1,4-DCB, BZ, CT, chloroform, and TCE exceeded IA screening levels.

The IA concentration of 1,4-DCB at IA-16 ($2.9 \mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL ($1.1 \mu\text{g}/\text{m}^3$). 1,4-DCB was not detected in OA (RL of $0.039 \mu\text{g}/\text{m}^3$), and was not detected in SS samples; however, the RL for 1,4-DCB in SS samples was elevated (5.6 to $8.2 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for 1,4-DCB may be attributable to an indoor or sub-slab source.

IA concentrations of BZ (up to $0.96 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.32 \mu\text{g}/\text{m}^3$), and were higher than the OA concentration ($0.34 \mu\text{g}/\text{m}^3$). BZ was not detected in SS samples; however, the RL for BZ in SS samples was elevated (17 to $24 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for BZ may be attributable to an indoor, outdoor, or sub-slab source.

IA concentrations of CT (up to $0.47 \mu\text{g}/\text{m}^3$) exceeded an IA MTCA screening level ($0.42 \mu\text{g}/\text{m}^3$), and were similar to the OA concentration ($0.47 \mu\text{g}/\text{m}^3$). It is therefore concluded that IA MTCA screening level exceedances for CT are likely attributable to an outdoor source. CT was detected at higher concentrations in SS samples (up to $3.1 \mu\text{g}/\text{m}^3$) but below SS screening levels.

IA concentrations of chloroform (up to $0.58 \mu\text{g}/\text{m}^3$) exceeded a MTCA screening level ($0.11 \mu\text{g}/\text{m}^3$). SS concentrations (up to $42 \mu\text{g}/\text{m}^3$) were two orders of magnitude higher than IA concentrations and exceeded SS USEPA and MTCA screening levels. Chloroform was detected in the OA sample at a lower concentration ($0.071 \mu\text{g}/\text{m}^3$) than the IA and SS samples. It is therefore concluded that IA MTCA screening level exceedances for chloroform are likely attributable to a sub-slab source.

The IA concentration of TCE at IA-15 ($5.0 \mu\text{g}/\text{m}^3$) exceeded an IA USEPA RSL ($3 \mu\text{g}/\text{m}^3$) and MTCA screening levels (0.61 and $0.91 \mu\text{g}/\text{m}^3$). SS concentrations (up to $18,000 \mu\text{g}/\text{m}^3$) were three orders of magnitude higher than IA concentrations and exceeded SS USEPA and MTCA screening levels. TCE was detected in the OA sample at

a lower concentration (0.046 µg/m³) than the IA and SS samples. It is therefore concluded that IA USEPA RSL and MTCA screening level exceedances for TCE are likely attributable to a sub-slab source. IA TCE concentrations (up to 5.0 µg/m³) were below the short-term criterion of 8.4 µg/m³.

The SS concentrations of 1,1,2,2-PCA, 1,1,2-TCA, HCBd, and PCE at SS-15 and SS-16 exceeded the SS USEPA and MTCA screening levels and were significantly higher than the paired IA concentrations. No IA screening level exceedances were noted for these parameters. It is therefore concluded that SS concentrations of 1,1,2,2-PCA, 1,1,2-TCA, HCBd, and PCE in exceedance of the SS screening levels are being adequately attenuated.

In summary, it is concluded that the IA screening level exceedance for 1,4-DCB is likely attributable to an indoor or sub-slab source. No specific obvious indoor sources were noted in the building. IA screening level exceedances for BZ are likely attributable to an indoor, outdoor, or sub-slab source. IA screening level exceedances for CT are likely attributable to an outdoor source. IA screening level exceedances for chloroform and TCE are likely attributable to a sub-slab source. IA TCE concentrations (up to 5.3 µg/m³) were below the short-term criterion of 8.4 µg/m³. SS concentrations of 1,1,2,2-PCA, 1,1,2-TCA, HCBd, and PCE in exceedance of the SS screening levels are being adequately attenuated.

Recommendation

It is recommended that this building be scheduled for mitigation by GSH in response to concentrations of chloroform and TCE; however, given the low usage of the building, the need for mitigation is not urgent. Additional, building ventilation will be employed, for example open windows and propped doors if periods of prolonged occupation occur prior to mitigation.

4.0 SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

Conclusions and recommendations for each building are summarized below.

Army Reserve Facility

IA screening level exceedances for BZ and CT are likely attributable to an outdoor source and possibly an indoor source for BZ (round two). IA screening level exceedances for chloroform (round one) and naphthalene are likely attributable to an indoor source. Potential indoor sources of naphthalene include the operation of vehicles in the maintenance area. IA detections of TCE are attributed to a potential indoor air source and potentially an isolated source beneath the maintenance area unrelated to the OCC plume.

No further action by GSH is proposed for this building, due to the apparent outdoor source, indoor source, and potentially subsurface source unrelated to the OCC Site based on the data presented herein.

Building 326

IA screening level exceedances for 1,2,4-TMB, 1,4-DCB, and chloroform (round one) are likely attributable to an indoor source. No specific obvious indoor sources were noted in the building; however, painting, carpeting, and new ceramic tile floors were installed in the last 2 years. IA screening level exceedances for BZ and CT (round one) are likely attributable to an outdoor source. Round two sampling further identified an IA exceedance for EB; however, data suggest this exceedance is likely attributable to an outdoor source with a potential contribution from indoor sources. Both round one and two sampling events identified IA screening level exceedance for TCE (3.9 and 3.1 $\mu\text{g}/\text{m}^3$, respectively) is likely attributable to a sub-slab source and the concentrations were below the short-term criterion of 8.4 $\mu\text{g}/\text{m}^3$.

It is recommended that this building be scheduled for mitigation by GSH in response to concentrations of TCE in both SS and IA.

Building 407

IA screening level exceedances for 1,2,4-TMB, chloroform (round one), EB (round two), naphthalene, o-xylene (round two), and styrene (round two) are likely attributable to indoor sources (Citadel Marine paint bay operations, miscellaneous power and hand tools, parts washing tubs, chemical storage tanks, three flammable material storage

lockers, paint cans, cleaning products, and miscellaneous building materials). IA screening level exceedances for BZ and CT are likely attributable to an outdoor source and an indoor source for BZ. SS concentrations of HCBd in round one were being adequately attenuated evidenced by HCBd not being detected in IA. Additionally, HCBd was not detected in any SS or IA samples in round three.

No further action by GSH is proposed for this building due to the identified indoor source and apparent outdoor sources unrelated to the OCC Site based on the data presented herein.

Building 532

IA screening level exceedances for 1,4-DCB and EB are likely attributable to an indoor source (aerosol cans containing chemical cleaners, lubricants, paints, and diesel fuel were observed). IA screening level exceedances for BZ and CT are likely attributable to an outdoor source. The IA screening level exceedance for TCE ($0.86 \mu\text{g}/\text{m}^3$) is likely attributable to a sub-slab source and the concentration was below the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$. Round two sampling did not confirm the presence of TCE exceeding IA screening criteria in any of the collected IA samples. However, SS sampling did identify TCE again exceeding soil gas screening levels.

It is recommended that this building be scheduled for mitigation by GSH in response to concentrations of TCE in both SS and IA.

Building 592

IA screening level exceedances for BZ, chloroform (round three), EB (rounds two and three), naphthalene (rounds one and three), and 1,2,4-TMB (round two) are likely attributable to an indoor source and possibly outdoor source for BZ and chloroform. IA screening level exceedances for CT (rounds one and three) are likely attributable to an outdoor source. IA screening level exceedances for TCE are likely attributable to an indoor source. The building survey identified TCE in degreasers used in maintenance areas in Building 592. The TCE concentration at IA-2 ($13 \mu\text{g}/\text{m}^3$) in round one exceeded the short-term criterion of $8.4 \mu\text{g}/\text{m}^3$. The rounds two and three maximum concentrations were $1.9 \mu\text{g}/\text{m}^3$ and $8.3 \mu\text{g}/\text{m}^3$, respectively, below the criterion. IA screening level exceedances for PCE in round three appear to be attributable to an indoor source. The data indicates that a potential isolated source exists beneath the shop area. The potential contribution to IA concentrations from location SS-32 is unclear. There were no exceedances for PCE in IA and SS samples in rounds one and two.

It is recommended that the shop area in this building be scheduled for additional monitoring by GSH to confirm SS vapor concentrations and further assess this portion of the building.

Building 595

IA screening level exceedances for BZ CT (rounds one and three), and chloroform (round three) are likely attributable to an outdoor source (no specific obvious indoor sources were noted in the building). IA screening level exceedance for naphthalene (round three) may be attributable to indoor and/or outdoor sources. SS concentrations of BZ, chloroform, PCE, and TCE in exceedance of the SS screening levels are being adequately attenuated.

No further action by GSH at this time is proposed for this building due to confirmation that BZ, chloroform, PCE, and TCE in soil vapor are adequately attenuated under the current use of the building.

Building 596

IA screening level exceedances for 1,2,4-TMB (round two), 1,4-DCB, chloroform (round one), EB (round two), naphthalene (rounds one and three), PCE, and TCE are likely attributable to an indoor source (numerous flammable storage lockers and stored chemicals including cleaners, and cutting oils were observed). IA screening level exceedances for BZ and EB (round three) are likely attributable to an indoor and possibly outdoor source. IA screening level exceedances for CT (rounds one and three) and chloroform (round three) sampling are likely attributable to an outdoor source. The TCE concentrations for both rounds one and two at IA-21 (19 and 15 $\mu\text{g}/\text{m}^3$, respectively) exceeded the short-term criterion of 8.4 $\mu\text{g}/\text{m}^3$ and the concentrations at IA-3 (6.6 and 2.9 $\mu\text{g}/\text{m}^3$) did not. The TCE concentrations for round three at IA-21 (7.1 $\mu\text{g}/\text{m}^3$), IA-3 (2.8 $\mu\text{g}/\text{m}^3$), and IA-35 (1.5 $\mu\text{g}/\text{m}^3$) are below the short-term criterion of 8.4 $\mu\text{g}/\text{m}^3$.

No further action by GSH is proposed for this building due to the identified indoor sources and apparent outdoor source unrelated to the OCC Site based on the data presented herein.

Guard Shack

IA MTCA screening level exceedances for BZ and CT are likely attributable to an outdoor source.

No further action by GSH is proposed for this building, as the observed exceedances of screening levels for IA appear to be due to outdoor source unrelated to the OCC Site, the location of the Guard Shack relative to the main plume, and the nature of the day-to-day operations at this location.

OCC Office Building

An IA screening level exceedance for 1,4-DCB is likely attributable to an indoor or sub-slab source. No specific obvious indoor sources were noted in the building. IA screening level exceedances for BZ are likely attributable to an indoor, outdoor, or sub-slab source. IA screening level exceedances for CT are likely attributable to an outdoor source. IA screening level exceedances for chloroform and TCE are likely attributable to a sub-slab source. IA TCE concentrations (up to 5.3 µg/m³) were below the short-term criterion of 8.4 µg/m³. SS concentrations of 1,1,2,2-PCA, 1,1,2-TCA, HCBd, and PCE in exceedance of the SS screening levels are being adequately attenuated.

It is recommended that this building be scheduled for mitigation by GSH in response to concentrations of chloroform and TCE; however, given the low usage of the building, the need for mitigation is not urgent.

Table 12 presents a summary of indoor sources, IA screening level exceedances and likely sources, and recommendations for additional work. The most frequently attributed sources for IA screening level exceedances were as follows:

Indoor sources: 1,2,4-TMB, 1,4-DCB, chloroform, EB, naphthalene, PCE

Outdoor sources: BZ, CT

Sub-slab source: TCE

In summary, the recommendations for additional work at the nine buildings are as follows (see Figure 11):

Mitigation by GSH (3): 326, 532, OCC Office

Additional Monitoring by GSH (1): 592 (shop area)

No Further Action by GSH (5): ARF, 407, 595, 596, Guard Shack

The purpose for conducting the vapor intrusion investigation was to evaluate vapor intrusion pathway.

Guidance permits evaluation of sub-slab gas, indoor air, and ambient (outdoor) air as follows:

If measured concentrations [sub-slab] are below levels that could lead to unacceptable indoor air concentrations, it is reasonable to conclude during Tier I that no further VI assessment is needed." (Page 3-9, Ecology, 2009).

"Ecology therefore suggests that investigators use building-specific upwind ambient air measurement data as follows:

- When the measured building-specific upwind ambient air VOC level is the same or higher than the measured maximum indoor concentration for that VOC, assume that VI is unlikely to be significantly impacting indoor air quality. In this situation the ambient contribution to the indoor air concentration is probably close to 100%.*
- When the measured indoor air concentration of a particular site-related VOC exceeds the measured ambient concentration of that VOC, assume that the contribution from ambient sources to the indoor air measurement is close to the measured ambient concentration. The VI contribution, which should be compared to acceptable indoor air levels, is the difference between the indoor measurement and the ambient measurement." (Page 3-21, Ecology, 2009).*

The Ecology guidance is consistent with EPA guidance.

The round one data were evaluated in accordance with guidance that specifically permits evaluating the sub-slab vapor concentrations with respect to indoor air concentrations and contributions from indoor and outdoor air sources. If the sub-slab vapor concentrations are below the screening criteria, then it is reasonable to conclude additional action by GSH is unnecessary. If the indoor air concentrations are below the screening criteria or above screening criteria but without corresponding exceedances of sub-slab screening criteria and thus attributable to indoor and/or outdoor air sources, then it is reasonable to conclude that additional action by GSH is unnecessary. If indoor air concentrations are similar to outdoor concentrations, then it is reasonable to conclude that the indoor concentrations can be attributed to ambient conditions.

The round two sample results did not alter the initial conclusions developed from the review of the round one results and recommendations remain to be for further actions (e.g., monitor and mitigation) by GSH at some specific buildings and no further actions by GSH at other specific buildings. Three buildings considered for no further action by GSH (i.e., ARF, 592, 596) are included for one additional round of monitoring during

cold weather to account for potential temporal variability of sub-slab, indoor, and outdoor measurements of VOC concentrations.

Analysis of the round three sample results along with the other rounds of data and review of additional building specific data has resulted in the determination that four of the five buildings (i.e., ARF, 407, 595, 596) included in round three do not require additional actions by GSH. In Building 592, it is proposed that an addition round of sampling near and within the shop be conducted to confirm the SS result.

Ecology guidance further states:

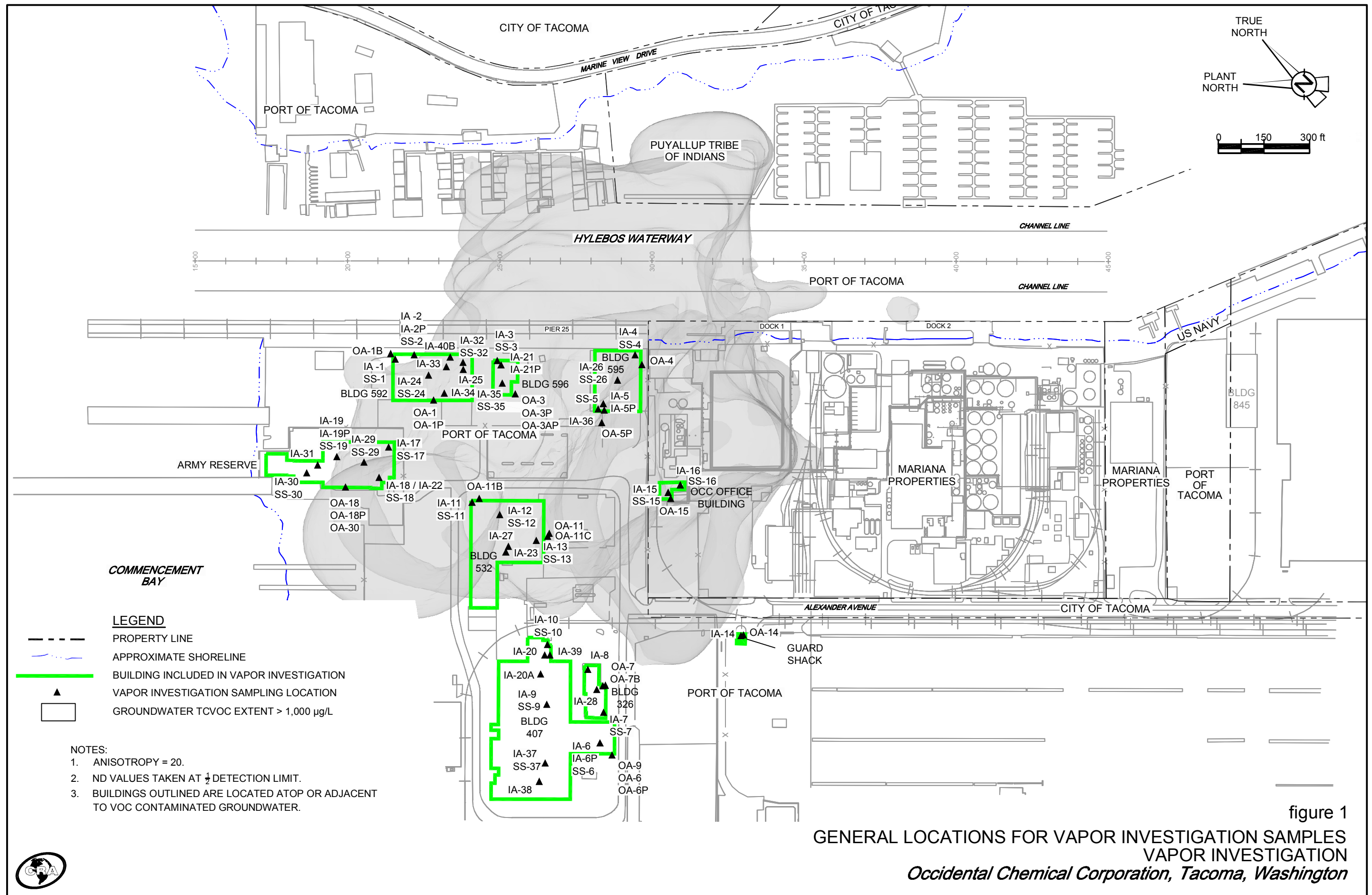
"Failing to accurately account for background VOC contributions can lead to exaggerating the perceived degree of vapor intrusion and installing unneeded mitigation systems. Not only does unneeded mitigation entail unnecessary cost, but the installed system will not be effective (that is, it will be unable to reduce indoor air VOC concentrations to target levels)." (Pages 3-20 and 3-21, Ecology, 2009).

Based on the three rounds of investigation, the exceedances of the TCE criteria for women of reproductive age appear to be related to activities in those specific buildings and not to potential OCC subsurface impacts. Specifically, sub-slab soil gas concentrations were found to be lower than indoor air concentrations and probable TCE sources inside the buildings were identified. Both Ecology and EPA guidance indicate that indoor air concentrations would be expected to be ten times lower than soil gas concentrations (Page 3-11 and Appendix-7, Ecology, 2009; Page 19, USEPA, 2009). This should lead to conservative decision making at most sites (Page 3-11, Ecology, 2009).

POT was advised to instruct tenants to implement additional ventilation in areas of identified exceedances based on the round one data. During periodic site visits to these locations, GSH representatives observed these building as having open windows and propped doors. GSH continues to make periodic site visits.

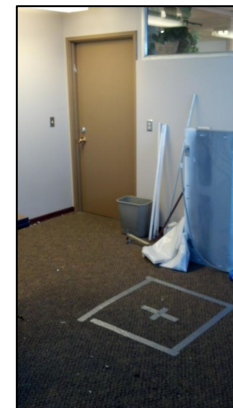
5.0 REFERENCES

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EXTERIOR VIEW - NORTHEAST CORNER



Indoor Air-28	01/07/2013
1,2,4-Trimethylbenzene	10(g)
1,4-Dichlorobenzene	2.2(a)
Benzene	0.64(f)
Ethylbenzene	4.0
m&p-Xylenes	15
o-Xylene	5.0
Styrene	2.1
Tetrachloroethene	4.9
Toluene	4.0
Trichloroethene	2.0(f,g)

Indoor Air-8	24/04/2013	01/07/2013
1,1,1-Trichloroethane	0.029 J/0.030 J	0.050 U
1,1-Dichloroethene	0.042/0.040	-
1,2,4-Trimethylbenzene	0.98/1.0	1.8
1,3,5-Trimethylbenzene	0.31 J/0.32 J	-
1,4-Dichlorobenzene	1.9(a)/2.0(a)	58 J(a)
Benzene	0.76(f)/0.68(f)	0.64(f)
Carbon tetrachloride	0.44(f)/0.48(f)	-
Chloroform (Trichloromethane)	0.26(f)/0.26(f)	-
Ethylbenzene	1.2/1.4	6.9(a)
m&p-Xylenes	4.3/3.7	29
Naphthalene	0.23/0.21	-
o-Xylene	1.8/1.3	9.5
Styrene	0.45 J/0.51 J	1.2
Tetrachloroethene	0.66/0.63	0.79
Toluene	3.9/3.2	3.1
trans-1,2-Dichloroethene	0.051/0.035 U	-
Trichloroethene	0.45/0.44	0.30
Vinyl chloride	0.0060 J/0.0057 J	-

Outside Air-7B	01/07/2013
1,2,4-Trimethylbenzene	0.71
1,4-Dichlorobenzene	0.61
Benzene	0.48
Ethylbenzene	4.8
m&p-Xylenes	21
o-Xylene	6.8
Styrene	0.52
Tetrachloroethene	0.082
Toluene	1.7

Outside Air-7	24/04/2013
1,1,1-Trichloroethane	0.028 J
1,2,4-Trimethylbenzene	1.2
1,3,5-Trimethylbenzene	0.38 J
1,4-Dichlorobenzene	0.038 J
Benzene	0.76
Carbon tetrachloride	0.47
Chloroform (Trichloromethane)	0.095 J
Ethylbenzene	0.77 J
m&p-Xylenes	2.3
Naphthalene	0.15 J
o-Xylene	0.89
Tetrachloroethene	0.13 J
Toluene	2.6
Trichloroethene	0.024 J

Sub-Slab Probe-7	24/04/2013	25/06/2013
1,1,1-Trichloroethane	1.2	1.6
1,1,1,2-Tetrachloroethane	0.039 U	0.037 J
1,1-Dichloroethene	0.012 J	0.019 J
1,4-Dichlorobenzene	0.035 J	0.063
Benzene	0.12 U	0.16
Carbon tetrachloride	0.14	0.14
Chloroform (Trichloromethane)	0.15 J	0.37
Ethylbenzene	0.043 J	0.12 J
Hexachlorobutadiene	0.026 J	0.039 U
m&p-Xylenes	0.13 J	0.34
Methylene chloride	0.78 U	0.37
Naphthalene	0.087 J	0.33
o-Xylene	0.035 J	0.17
Styrene	0.78 U	0.30 J
Tetrachloroethene	12	15
Toluene	0.26 J	0.34
trans-1,2-Dichloroethene	0.039 U	0.020 J
Trichloroethene	10(h,i)	14(h,i)
Vinyl chloride	0.039 U	0.0051 J

Indoor Air-7	24/04/2013	01/07/2013
1,1,1-Trichloroethane	0.032 J	0.050 U
1,1-Dichloroethene	0.022 J	-
1,2,4-Trimethylbenzene	4.7(g)	16(g)
1,3,5-Trimethylbenzene	1.5	-
1,4-Dichlorobenzene	0.14 J	1.3(a)
Benzene	0.71(f)	0.65(f)
Carbon tetrachloride	0.45(f)	-
Chloroform (Trichloromethane)	0.19(f)	-
Ethylbenzene	1.0	4.1
m&p-Xylenes	2.9	16
Naphthalene	0.16	-
o-Xylene	1.1	5.6
Styrene	0.35 J	1.9
Tetrachloroethene	4.1	6.9
Toluene	2.6	3.9
Trichloroethene	3.9(a,f,g)	3.1(a,f,g)
Vinyl chloride	0.0042 J	-

SCREENING CRITERIA (ug/m3)									
	EPA RSL		Indoor Air		MTCA				
	C	NC	C	NC	C	NC	C	NC	
Volatile Organic Compounds									
	a	b	c	d	e	f	g	h	i
1,1,1-Trichloroethane		22000		220000			2286		22857
1,1,2,2-Tetrachloroethane	0.21		2.1		0.043		0.43		
1,1-Dichloroethene		880		8800			91		914
1,2,4-Trichlorobenzene		8.8		88			0.91		9.1
1,2,4-Trimethylbenzene		31		310			3.2		32
1,3,5-Trimethylbenzene									
1,4-Dichlorobenzene	1.1	3500	11	35000			366		3657
Benzene	1.6	130	16	1300	0.32	14	3.2	137	
Carbon tetrachloride	2	440	20	4400	0.42	46	4.2	457	
Chloroform (Trichloromethane)	0.53	430	5.3	4300	0.11		1.1		
cis-1,2-Dichloroethene									
Ethylbenzene	4.9	4400	49	44000			457		4571
Hexachlorobutadiene	0.56		5.6		0.11		1.1		
m&p-Xylenes									
Methylene chloride	1200	2600	12000	26000	250	274	2500	2743	
Naphthalene	0.36	13	3.6	130			1.4		14
o-Xylene		440		4400			46		457
Styrene		4400		44000			457		4571
Tetrachloroethene	47	180	470	1800	9.6	18	96	183	
Toluene		22000		220000			2286		22857
trans-1,2-Dichloroethene		260		2600			27		274
Trichloroethene	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1
Vinyl chloride	2.8	440	28	4400	0.28	46	2.8	457	

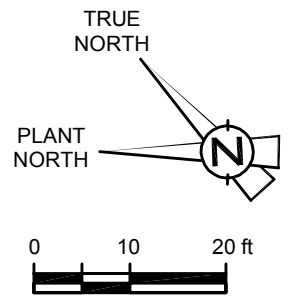
NOTE: ¹ INDOOR AIR CONCENTRATION DIVIDED BY 0.1

LEGEND

- BUILDING OUTLINE
- VAPOR INVESTIGATION SAMPLING LOCATION
- SAMPLE LOCATION

Sub-Slab Probe-7	4/24/2013
1,1,1-Trichloroethane	1.2
Chloroform (Trichloromethane)	0.15 J

- SAMPLE DATE
- RESULT (ug/m³)
- PARAMETER
- EXCEEDS CRITERIA IDENTIFIED IN PARENTHESIS



WIND (4/23)

figure 3

DETECTED PARAMETERS - BUILDING 326
VAPOR INVESTIGATION
Occidental Chemical Corporation, Tacoma, Washington

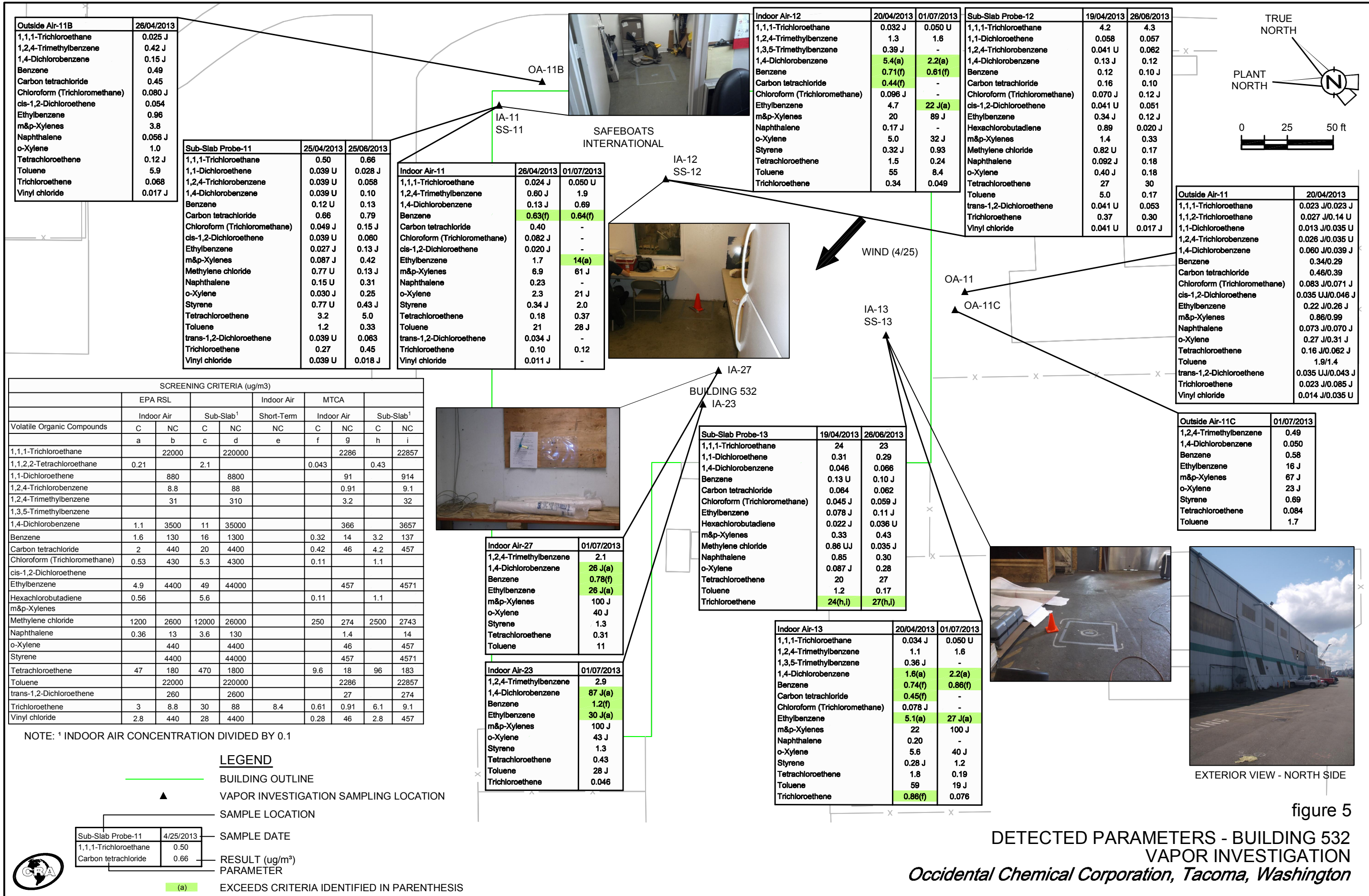


figure 5
 DETECTED PARAMETERS - BUILDING 532
 VAPOR INVESTIGATION
 Occidental Chemical Corporation, Tacoma, Washington

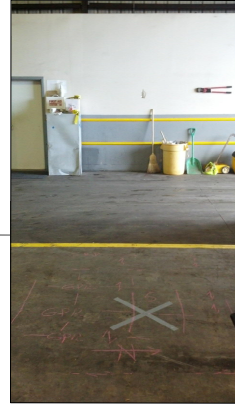
Sub-Slab Probe-28	3/12/2014
1,1,1-Trichloroethane	1.5
1,1-Dichloroethane	0.50
1,2,4-Trimethylbenzene	0.18 J
Benzene	0.48 J
Carbon tetrachloride	0.12 J
Chloroform (Trichloromethane)	1.1 J
cis-1,2-Dichloroethane	0.37
Ethylbenzene	0.22 J
m&p-Xylenes	0.57 J
Naphthalene	0.12 J
o-Xylene	0.20 J
Tetrachloroethane	2800(c,d,h)
Toluene	2.5
trans-1,2-Dichloroethane	0.14 J
Trichloroethane	940(c,d,h)



Sub-Slab Probe-4	4/20/2013	6/28/2013	3/12/2014
1,1,1-Trichloroethane	8.0	9.8	6.2
Benzene	3.7 U	6.9 J(h)	1.2 J
Carbon tetrachloride	0.15 J	0.50 U	0.86 U
Chloroform (Trichloromethane)	2.2 J(h)	3.2 J(h)	1.8 J(h)
cis-1,2-Dichloroethane	0.87 J	1.7 U	0.71 J
Tetrachloroethane	3800(c,d,h)	7400(c,d,h)	3000(c,d,h)
Toluene	4.9 U	2.5 J	0.59 J
trans-1,2-Dichloroethane	1.2 U	1.9 U	0.23 J
Trichloroethane	1800(c,d,h)	2500(c,d,h)	1400(c,d,h)

Indoor Air-4	4/21/2013	7/1/2013	3/13/2014
1,1,1-Trichloroethane	0.024 J	0.050 U	0.023 J
1,2,4-Trimethylbenzene	1.0	0.72 J	0.83
1,3,5-Trimethylbenzene	0.28 J	-	0.24
1,4-Dichlorobenzene	0.022 J	0.052 J	0.034
Benzene	0.42(f)	0.55 J(f)	1.0(f)
Carbon tetrachloride	0.44(f)	-	0.42
Chloroform (Trichloromethane)	0.083 J	-	0.10 J
cis-1,2-Dichloroethane	0.023 J	-	0.042
Ethylbenzene	0.82	1.6 J	1.1
m&p-Xylenes	3.3	5.6 J	4.0
Methylene chloride	0.26	-	2.1
Naphthalene	0.23	-	0.41(e)
o-Xylene	1.2	2.2 J	1.4
Styrene	0.35 J	1.7 J	0.38
Tetrachloroethane	0.34	0.64 J	0.57
Toluene	3.8	3.5 J	6.3
Trichloroethane	0.089 J	0.27 J	0.18
Vinyl chloride	0.0040 J	-	0.017 J
Xylenes (total)	4.5	7.8 J	-

Indoor Air-28	7/1/2013	3/13/2014
1,1,1-Trichloroethane	0.050 U	0.028 J
1,2,4-Trimethylbenzene	0.73	1.2
1,3,5-Trimethylbenzene	-	0.41
1,4-Dichlorobenzene	0.052	0.12
Benzene	0.55(f)	1.3(f)
Carbon tetrachloride	-	0.48(f)
Chloroform (Trichloromethane)	-	0.12 J(f)
cis-1,2-Dichloroethane	-	0.054
Ethylbenzene	1.5	1.5
m&p-Xylenes	5.1	5.5
Methylene chloride	-	0.51
Naphthalene	-	0.19
o-Xylene	2.0	1.8
Styrene	1.8	0.85
Tetrachloroethane	0.55	0.85
Toluene	16 J	6.3
Trichloroethane	0.30	0.21
Vinyl chloride	-	0.021 J
Xylenes (total)	7.1	-



Outside Air-4	4/21/2013	7/1/2013	3/13/2014
1,1,1-Trichloroethane	0.023 J	0.050 U	0.028 J
1,2,4-Trimethylbenzene	0.75 U	0.47	0.43
1,3,5-Trimethylbenzene	0.75 U	-	0.13 J
1,4-Dichlorobenzene	0.018 J	0.045 U	1.2
Benzene	0.23	0.70	1.2
Carbon tetrachloride	0.49	-	0.38
Chloroform (Trichloromethane)	0.070 J	-	0.094 J
cis-1,2-Dichloroethane	0.037 U	-	0.057
Ethylbenzene	0.20	1.5	0.91
Hexachlorobutadiene	0.037 U	-	0.020 J
m&p-Xylenes	0.58 J	6.1	3.1
Methylene chloride	0.75 U	-	0.56
Naphthalene	0.032 J	-	0.19
o-Xylene	0.18	0.86	0.90
Styrene	0.75 U	0.81	0.33
Tetrachloroethane	0.19	1.0	2.0
Toluene	0.60 J	2.0	2.9
trans-1,2-Dichloroethane	0.037 U	-	0.0097 J
Styrene	0.038	0.24	0.30
Vinyl chloride	0.037 U	-	0.024 J
Xylenes (total)	0.78 J	6.96	-

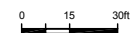
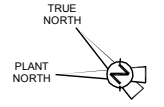
Indoor Air-5P	3/18/2014
1,1,1-Trichloroethane	0.015
1,2,4-Trimethylbenzene	0.50 J
1,4-Dichlorobenzene	0.036 J
Benzene	0.71(f)
Ethylbenzene	2.4 J
m&p-Xylenes	8.3 J
o-Xylene	2.5 J
Styrene	0.39 J
Tetrachloroethane	1.5 J
Toluene	4.8 J
Trichloroethane	0.27

Indoor Air-6	4/21/2013	7/1/2013	3/13/2014
1,1,1-Trichloroethane	0.026 J	0.050 U	0.026 J
1,2,4-Trimethylbenzene	0.0051 J	-	0.18 U
1,3,5-Trimethylbenzene	1.2	1.8	0.98
1,4-Dichlorobenzene	0.33 J	-	0.28
Benzene	0.037 U	0.052	0.031 J
Carbon tetrachloride	0.75(f)	0.98(f)	1.2(f)
Chloroform (Trichloromethane)	0.47(f)	-	0.47(f)
cis-1,2-Dichloroethane	0.037 U	-	0.058
Ethylbenzene	0.82	2.1	1.5
m&p-Xylenes	3.1	7.0	4.9
Methylene chloride	0.74 U	-	0.57
Naphthalene	0.20	-	0.11 J
o-Xylene	1.1	2.7	1.7
Styrene	0.28 J	1.8	0.43
Tetrachloroethane	1.4	1.0	1.1
Toluene	3.5	5.2	6.6
trans-1,2-Dichloroethane	0.037 U	-	0.0069 J
Trichloroethane	0.24	0.40	0.24
Vinyl chloride	0.037 U	-	0.028 J
Xylenes (total)	4.2	9.7	-

Sub-Slab Probe-5	4/20/2013	6/28/2013	3/12/2014
1,1,1-Trichloroethane	1.8	2.2 J	1.9
Benzene	3.9 U	5.1 J(h)	1.3
Carbon tetrachloride	1.3 U	0.46 U	1.4
Chloroform (Trichloromethane)	1.4 J(h)	1.9 J(h)	5.4(c,h)
cis-1,2-Dichloroethane	0.51 J	1.8 U	2.1
m&p-Xylenes	5.1 U	1.5 U	0.38 J
Naphthalene	5.1 U	2.9 U	0.17 J
o-Xylene	5.1 U	0.70 U	0.30 J
Tetrachloroethane	3600(c,d,h)	5400(c,d,h)	1400(c,h)
Toluene	5.1 U	2.5 J	0.86 J
trans-1,2-Dichloroethane	1.3 U	1.7 U	1.2
Trichloroethane	1500(c,d,h)	1800(c,d,h)	940(c,d,h)

Indoor Air-36	3/13/2014
1,1,1-Trichloroethane	0.026 J
1,2,4-Trimethylbenzene	1.0
1,3,5-Trimethylbenzene	0.32
1,4-Dichlorobenzene	0.038
Benzene	1.0(f)
Carbon tetrachloride	0.47(f)
Chloroform (Trichloromethane)	0.11 J
cis-1,2-Dichloroethane	0.055
Ethylbenzene	1.5
m&p-Xylenes	5.2
Methylene chloride	0.46
Naphthalene	0.19
o-Xylene	1.7
Styrene	0.82
Tetrachloroethane	2.8
Toluene	6.3
trans-1,2-Dichloroethane	0.0090 J
Trichloroethane	0.52
Vinyl chloride	0.024 J

Outside Air-5P	3/18/2014
1,1,1-Trichloroethane	0.013
1,2,4-Trimethylbenzene	0.11
1,4-Dichlorobenzene	0.014
Benzene	0.77
Ethylbenzene	1.5
m&p-Xylenes	5.2
o-Xylene	1.4
Styrene	0.14
Tetrachloroethane	0.29
Toluene	1.8
Trichloroethane	0.24



LEGEND
 BUILDING OUTLINE
 VAPOR INVESTIGATION SAMPLING LOCATION
 SAMPLE LOCATION

Sub-Slab Probe-5	4/20/2013	SAMPLE DATE
Tetrachloroethane	3600	RESULT (ug/m ³)
Trichloroethane	1500	PARAMETER

SCREENING CRITERIA (ug/m ³)	EPA REL		Indoor Air		MTC	
	Indoor Air	Sub-Slab ¹	Indoor Air	Indoor Air	Sub-Slab ¹	Sub-Slab ¹
Volatiles Organic Compounds	C	NC	C	NC	C	NC
1,1,1-Trichloroethane	22000	-	22000	-	2286	2287
1,1,2,2-Tetrachloroethane	0.21	880	2.1	8800	0.043	91
1,2-Dichloroethane	-	-	-	-	-	914
1,2,4-Trichlorobenzene	-	8.8	-	88	-	9.1
1,2,4-Trimethylbenzene	-	31	-	310	-	3.2
1,3,5-Trimethylbenzene	-	-	-	-	-	32
1,4-Dichlorobenzene	1.1	3500	11	35000	-	366
Benzene	1.6	130	16	1300	0.32	14
Carbon tetrachloride	2	440	20	4400	0.42	46
Chloroform (Trichloromethane)	0.53	430	5.3	4300	0.11	1.1
cis-1,2-Dichloroethane	-	-	-	-	-	457
Ethylbenzene	4.9	4400	49	44000	-	457
Hexachlorobutadiene	0.56	-	5.6	-	0.11	1.1
m&p-Xylenes	-	1200	2600	12000	2600	274
Methylene chloride	0.36	13	3.6	130	-	14
Naphthalene	-	-	-	-	-	46
o-Xylene	440	-	4400	-	-	457
Styrene	4400	-	44000	-	-	457
Tetrachloroethane	47	180	470	1800	9.6	18
Toluene	22000	-	220000	-	2286	2287
trans-1,2-Dichloroethane	260	-	2600	-	27	274
Trichloroethane	3	8.8	30	88	6.4	6.1
Vinyl chloride	2.8	440	28	4400	0.29	46

NOTE: ¹ INDOOR AIR CONCENTRATION DIVIDED BY 0.1

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON
 VAPOR INVESTIGATION
 DETECTED PARAMETERS
 BUILDING 595



Source Reference:

Project Manager:	Reviewed By:	Date:
		MAY 2014
Scale:	Project No:	Report No:
1:30	07843-M9	129
		Drawing No:
		figure 7



Indoor Air-3	4/22/2013	7/1/2013	3/15/2014
1,1,1-Trichloroethane	0.34	0.34	0.65
1,2,4-Trimethylbenzene	1.0	2.2	1.2
1,3,5-Trimethylbenzene	0.30 J	-	0.37
1,4-Dichlorobenzene	0.18	1.1	0.34
Benzene	0.85(f)	1.3(f)	1.4(f)
Carbon tetrachloride	0.48(f)	-	0.47(f)
Chloroform (Trichloromethane)	0.27(f)	-	0.13 J(f)
cis-1,2-Dichloroethane	0.032 J	-	0.051
Ethylbenzene	2.8	8.4(a)	4.9
m,p-Xylenes	9.8	32 J	18
Methylene chloride	5.5 J	-	11
Naphthalene	0.37(a)	-	0.70(a)
o-Xylene	3.3	12	5.8
Styrene	0.29 J	1.8	0.55
Tetrachloroethane	2.9	3.0	1.2
Toluene	11	20 J	9.5
trans-1,2-Dichloroethane	0.025 J	-	0.053
Trichloroethane	6.8(a,f,g)	2.9(f,g)	2.8(f,g)
Vinyl chloride	0.0044 J	-	0.021 J
Xylenes (total)	13.1	44 J	-



Indoor Air-21P	3/21/2014
1,1,1-Trichloroethane	1.0 J
1,2,4-Trimethylbenzene	1.1 J
1,4-Dichlorobenzene	1.4 J(a)
Benzene	0.93 J(f)
Ethylbenzene	5.4 J(a)
m,p-Xylenes	13 J
o-Xylene	7.1 J
Styrene	0.40 J
Tetrachloroethane	2.1 J
Toluene	8.3 J
Trichloroethane	4.8 J(a,f,g)

Sub-Slab Probe-3	4/21/2013	6/27/2013	3/14/2014
1,1,1-Trichloroethane	0.70	0.74	0.45
1,1,2-Trichloroethane	0.0090 J	0.15 U	0.16 U
1,1-Dichloroethane	0.039 U	0.015 J	0.039 U
1,2,4-Trimethylbenzene	0.78 U	0.78 U	0.089 J
1,3,5-Trimethylbenzene	0.78 U	0.78 U	0.023 J
1,4-Dichlorobenzene	0.027 J	0.046	0.032 J
Benzene	0.18	0.54	0.12 U
Carbon tetrachloride	0.32	0.31	0.29
Chloroform (Trichloromethane)	0.044 J	0.079 J	0.046 J
cis-1,2-Dichloroethane	0.039 U	0.038 U	0.028 J
Ethylbenzene	0.081 J	0.53	0.037 J
Hexachlorobutadiene	0.097	0.038 U	0.039 U
m,p-Xylenes	0.31	1.8	0.15 J
Methylene chloride	0.78 UJ	0.59	0.16 U
Naphthalene	0.079 J	0.32	0.16
o-Xylene	0.12 J	0.70	0.054 J
Styrene	0.78 U	0.55 J	0.073 J
Tetrachloroethane	28	35	28
Toluene	0.34 J	2.5	0.068 J
Trichloroethane	0.28	0.15	0.077
Xylenes (total)	0.43 J	2.5	-

Indoor Air-21	4/22/2013	7/1/2013	3/15/2014
1,1,1-Trichloroethane	2.8	0.85	0.79
1,1-Dichloroethane	0.017 J	-	0.010 J
1,2,4-Trimethylbenzene	1.9	4.4(g)	1.2
1,3,5-Trimethylbenzene	0.52 J	-	0.35
1,4-Dichlorobenzene	2.7(a)	6.5(a)	0.73
Benzene	1.1(f)	0.82(f)	1.3(f)
Carbon tetrachloride	0.48(f)	-	0.46(f)
Chloroform (Trichloromethane)	0.088 J	-	0.085 J
cis-1,2-Dichloroethane	0.035 J	-	0.046
Ethylbenzene	2.2	9.9(a)	4.9
Hexachlorobutadiene	0.56	5.6	1.1
m,p-Xylenes	8.5	37 J	19
Methylene chloride	75 J	-	28
Naphthalene	0.46(a)	-	0.71(a)
o-Xylene	2.5	13	5.4
Styrene	0.48 J	2.2	0.48
Tetrachloroethane	12(f)	13(f)	2.6
Toluene	25	37 J	13
trans-1,2-Dichloroethane	0.14 J	-	0.13
Trichloroethane	19(a,b,e,f,g)	15 J(a,b,e,f,g)	7.1(a,f,g)
Vinyl chloride	0.0048 J	-	0.018 J
Xylenes (total)	11	50 J(g)	-

TRUE NORTH
PLANT NORTH

LEGEND
 BUILDING OUTLINE
 VAPOR INVESTIGATION SAMPLING LOCATION
 SAMPLE LOCATION

Sub-Slab Probe-3	4/21/2013	6/27/2013	3/14/2014
1,1,1-Trichloroethane	0.70	-	-
Benzene	0.18	-	-

SAMPLE DATE
RESULT (ug/m³)
PARAMETER
EXCEEDS CRITERIA IDENTIFIED IN PARENTHESIS

SCREENING CRITERIA (ug/m ³)	EPA NSL				Indoor Air				MTCR			
	Indoor Air	Sub-Slab ¹	Indoor Air	Sub-Slab ¹	Indoor Air	Sub-Slab ¹	Indoor Air	Sub-Slab ¹	Indoor Air	Sub-Slab ¹	Indoor Air	Sub-Slab ¹
1,1,1-Trichloroethane	22000	-	22000	-	0.043	0.43	2286	2287	-	-	-	-
1,1,2-Trichloroethane	880	2.1	8800	-	-	-	91	914	-	-	-	-
1,2,4-Trimethylbenzene	88	-	88	-	-	-	0.91	9.1	-	-	-	-
1,3,5-Trimethylbenzene	31	-	310	-	-	-	3.2	32	-	-	-	-
1,4-Dichlorobenzene	1.1	3500	11	35000	-	-	366	3657	-	-	-	-
Benzene	1.6	130	16	1300	-	-	0.32	3.2	137	-	-	-
Carbon tetrachloride	2	440	20	4400	-	-	0.42	4.2	457	-	-	-
Chloroform (Trichloromethane)	0.53	430	5.3	4300	-	-	0.11	1.1	-	-	-	-
cis-1,2-Dichloroethane	-	-	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	4.9	4400	49	44000	-	-	457	4571	-	-	-	-
Hexachlorobutadiene	0.56	-	5.6	-	-	-	0.11	1.1	-	-	-	-
m,p-Xylenes	-	-	-	-	-	-	250	274	2500	2743	-	-
Methylene chloride	1200	2000	12000	20000	-	-	5.4	54	-	-	-	-
Naphthalene	0.36	13	3.6	130	-	-	-	-	-	-	-	-
o-Xylene	440	-	4400	-	-	-	46	457	-	-	-	-
Styrene	4400	-	44000	-	-	-	457	4571	-	-	-	-
Tetrachloroethane	47	180	470	1800	-	-	9.6	96	153	-	-	-
Toluene	22000	-	220000	-	-	-	2286	22867	-	-	-	-
trans-1,2-Dichloroethane	260	-	2600	-	-	-	27	274	-	-	-	-
Trichloroethane	3	8.8	30	88	-	-	6.4	64	6.1	61	9.1	91
Vinyl chloride	2.8	440	28	4400	-	-	0.28	2.8	457	-	-	-

NOTE: ¹ INDOOR AIR CONCENTRATION DIVIDED BY 0.1



Outside Air-1	4/22/2013	3/18/2014
1,1,1-Trichloroethane	0.028 J	0.021 J
1,1,2-Trichloroethane	0.0084 J	0.18 U
1,2,4-Trimethylbenzene	0.28 J	0.29
1,3,5-Trimethylbenzene	0.71 U	0.085 J
1,4-Dichlorobenzene	0.027 J	0.014 J
Benzene	0.46	0.85
Carbon tetrachloride	0.50	0.48
Chloroform (Trichloromethane)	0.077 J	0.080 J
cis-1,2-Dichloroethane	0.021 J	0.21
Ethylbenzene	0.29 J	0.49
m,p-Xylenes	0.87	1.6
Methylene chloride	0.71 UJ	0.44
Naphthalene	0.11 J	0.081 J
o-Xylene	0.31 J	0.59
Styrene	0.71 U	0.092 J
Tetrachloroethane	0.13 J	0.41
Toluene	1.5	1.7
trans-1,2-Dichloroethane	0.035 U	0.019 J
Trichloroethane	0.38	0.25
Vinyl chloride	0.035 U	0.29
Xylenes (total)	1.18 J	-

Sub-Slab Probe-35	3/14/2014
1,1,1-Trichloroethane	3.3
1,1-Dichloroethane	0.038
1,2,4-Trimethylbenzene	0.043 J
1,4-Dichlorobenzene	0.024 J
Carbon tetrachloride	0.25
Chloroform (Trichloromethane)	2.6(f)
Ethylbenzene	0.073 J
m,p-Xylenes	0.26
Methylene chloride	0.18
Naphthalene	0.077 J
o-Xylene	0.084 J
Styrene	0.14
Tetrachloroethane	69
Toluene	0.52
Trichloroethane	0.13

Indoor Air-35	3/15/2014
1,1,1-Trichloroethane	0.097
1,2,4-Trimethylbenzene	0.47
1,3,5-Trimethylbenzene	0.13 J
1,4-Dichlorobenzene	0.052
Benzene	0.81(f)
Carbon tetrachloride	0.46(f)
Chloroform (Trichloromethane)	0.083 J
Chloroform (Trichloromethane)	0.042
Ethylbenzene	5.5(a)
m,p-Xylenes	21
Methylene chloride	2.6
Naphthalene	0.24
o-Xylene	6.1
Styrene	0.17
Tetrachloroethane	0.55
Toluene	3.4
trans-1,2-Dichloroethane	0.029 J
Trichloroethane	1.5(f,g)
Vinyl chloride	0.019 J

Outside Air-3P	3/18/2014	3/21/2014
1,1,1-Trichloroethane	0.020	0.028
1,2,4-Trimethylbenzene	0.17	0.15
1,4-Dichlorobenzene	0.026	0.044
Benzene	0.72	0.59
Ethylbenzene	1.4	1.8
m,p-Xylenes	5.1	6.5
Styrene	1.8	2.0
Tetrachloroethane	0.19	0.23
Toluene	0.21	0.22
Trichloroethane	1.9	1.3
Trichloroethane	0.11	0.10

Outside Air-3	3/15/2014
1,1,1-Trichloroethane	0.021 J
1,2,4-Trimethylbenzene	0.32
1,3,5-Trimethylbenzene	0.10 J
1,4-Dichlorobenzene	0.029 J
Benzene	0.43
Carbon tetrachloride	0.096 J
Chloroform (Trichloromethane)	4.2
Ethylbenzene	0.055
m,p-Xylenes	17
Methylene chloride	0.39
Naphthalene	0.15 J
o-Xylene	4.9
Styrene	0.23
Tetrachloroethane	0.18
Toluene	2.0
Trichloroethane	0.20
Vinyl chloride	0.025 J



EXTERIOR VIEW - WEST SIDE

SCALE VERIFICATION
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

OCCEIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON
VAPOR INVESTIGATION
DETECTED PARAMETERS
BUILDING 596



Source Reference:

Project Manager:	Reviewed By:	Date:
Scale: 1:20	Project N ^o : 07843-M9	Report N ^o : 129
		Drawing N ^o : figure 8

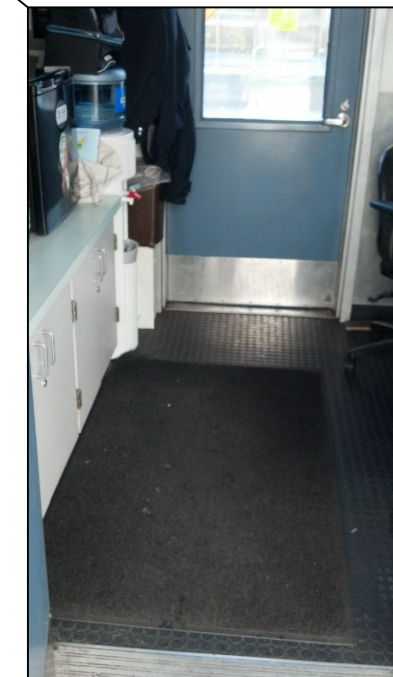
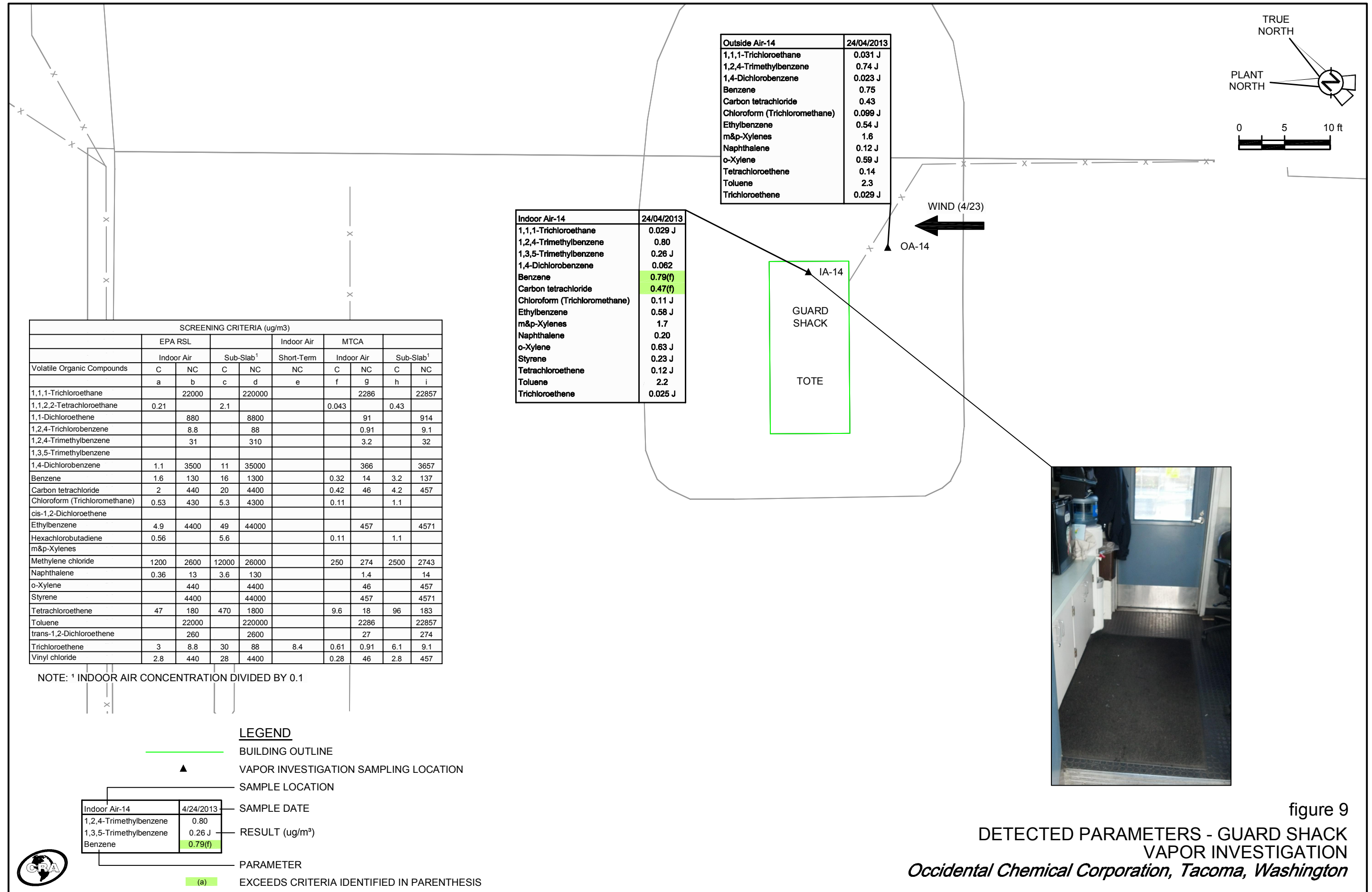


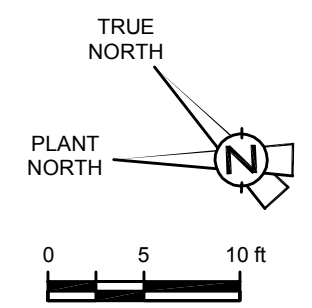
figure 9
 DETECTED PARAMETERS - GUARD SHACK
 VAPOR INVESTIGATION
 Occidental Chemical Corporation, Tacoma, Washington

Indoor Air-15	18/04/2013
1,1,1-Trichloroethane	0.027 J
1,2,4-Trimethylbenzene	0.59 J
1,4-Dichlorobenzene	0.14
Benzene	0.96(f)
Carbon tetrachloride	0.47(f)
Chloroform (Trichloromethane)	0.24(f)
cis-1,2-Dichloroethene	0.071
Ethylbenzene	0.59 J
Hexachlorobutadiene	0.046
m&p-Xylenes	1.7
Naphthalene	0.36
o-Xylene	0.57 J
Styrene	0.21 J
Tetrachloroethene	8.8
Toluene	3.3
Trichloroethene	5.0(a,f,g)

Sub-Slab Probe-15	17/04/2013
1,1,1-Trichloroethane	74
1,1,2,2-Tetrachloroethane	13(c,h)
1,1,2-Trichloroethane	19 J(c,d,h)
1,1-Dichloroethene	5.6 J
Carbon tetrachloride	2.1 J
Chloroform (Trichloromethane)	42(c,h)
cis-1,2-Dichloroethene	97
Hexachlorobutadiene	29(c,h)
Tetrachloroethene	30000(c,d,h,i)
trans-1,2-Dichloroethene	10
Trichloroethene	18000(c,d,h,i)



EXTERIOR VIEW - WEST SIDE



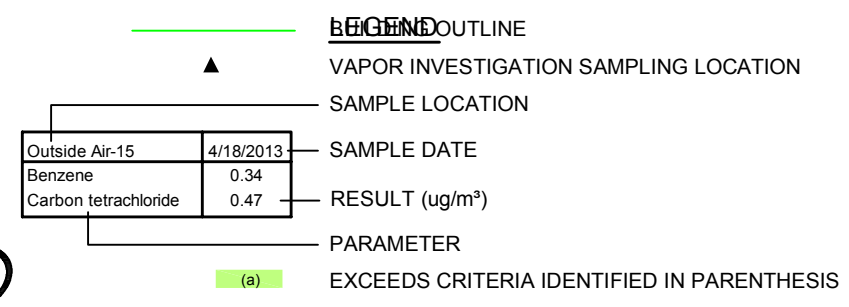
OCC OFFICE BUILDING

IA-16
SS-16

Sub-Slab Probe-16	17/04/2013
1,1,1-Trichloroethane	62
1,1,2,2-Tetrachloroethane	4.7 J(c,h)
1,1,2-Trichloroethane	3.2 J(h)
1,1-Dichloroethene	1.5 J
Carbon tetrachloride	3.1 J
Chloroform (Trichloromethane)	28(c,h)
cis-1,2-Dichloroethene	9.4
Ethylbenzene	5.2 J
Hexachlorobutadiene	28(c,h)
m&p-Xylenes	3.8 J
o-Xylene	3.3 J
Tetrachloroethene	21000(c,d,h,i)
trans-1,2-Dichloroethene	10
Trichloroethene	6000(c,d,h,i)

	SCREENING CRITERIA (ug/m3)										
	EPA RSL		Indoor Air		MTCA		Indoor Air		MTCA		
	Indoor Air	Sub-Slab ¹	Short-Term	Indoor Air	Sub-Slab ¹	Short-Term	Indoor Air	Sub-Slab ¹	Short-Term	Indoor Air	
Volatiles Organic Compounds	C	NC	C	NC	NC	C	NC	C	NC	C	NC
	a	b	c	d	e	f	g	h	i	j	k
1,1,1-Trichloroethane		22000		220000			2286		22857		
1,1,2,2-Tetrachloroethane	0.21		2.1			0.043		0.43			
1,1-Dichloroethene		880		8800			91		914		
1,2,4-Trimethylbenzene		8.8		88			0.91		9.1		
1,2,4-Trimethylbenzene		31		310			3.2		32		
1,3,5-Trimethylbenzene											
1,4-Dichlorobenzene	1.1	3500	11	35000			366		3657		
Benzene	1.6	130	16	1300		0.32	14	3.2	137		
Carbon tetrachloride	2	440	20	4400		0.42	46	4.2	457		
Chloroform (Trichloromethane)	0.53	430	5.3	4300		0.11		1.1			
cis-1,2-Dichloroethene											
Ethylbenzene	4.9	4400	49	44000			457		4571		
Hexachlorobutadiene	0.56		5.6				0.11		1.1		
m&p-Xylenes											
Methylene chloride	1200	2600	12000	26000		250	274	2500	2743		
Naphthalene	0.36	13	3.6	130			1.4		14		
o-Xylene		440		4400			46		457		
Styrene		4400		44000			457		4571		
Tetrachloroethene	47	180	470	1800		9.6	18	96	183		
Toluene		22000		220000			2286		22857		
trans-1,2-Dichloroethene		260		2600			27		274		
Trichloroethene	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1		
Vinyl chloride	2.8	440	28	4400		0.28	46	2.8	457		

NOTE: ¹ INDOOR AIR CONCENTRATION DIVIDED BY 0.1



IA-15
SS-15



WIND (4/17)

OA-15

Outside Air-15	18/04/2013
1,1,1-Trichloroethane	0.025 J
Benzene	0.34
Carbon tetrachloride	0.47
Chloroform (Trichloromethane)	0.071 J
cis-1,2-Dichloroethene	0.024 J
Ethylbenzene	0.13 J
m&p-Xylenes	0.44
Naphthalene	0.21
o-Xylene	0.17
Tetrachloroethene	0.27
Toluene	0.81
Trichloroethene	0.046

Indoor Air-16	18/04/2013
1,1,1-Trichloroethane	0.034 J
1,2,4-Trimethylbenzene	0.54 J
1,4-Dichlorobenzene	2.9(a)
Benzene	0.48(f)
Carbon tetrachloride	0.45(f)
Chloroform (Trichloromethane)	0.58(a,f)
Ethylbenzene	0.23 J
Hexachlorobutadiene	0.021 J
m&p-Xylenes	0.88
Naphthalene	0.085 J
o-Xylene	0.37 J
Styrene	0.89
Tetrachloroethene	0.70
Toluene	1.1
Trichloroethene	0.24

figure 10

DETECTED PARAMETERS - OCC OFFICE BUILDING
VAPOR INVESTIGATION
Occidental Chemical Corporation, Tacoma, Washington

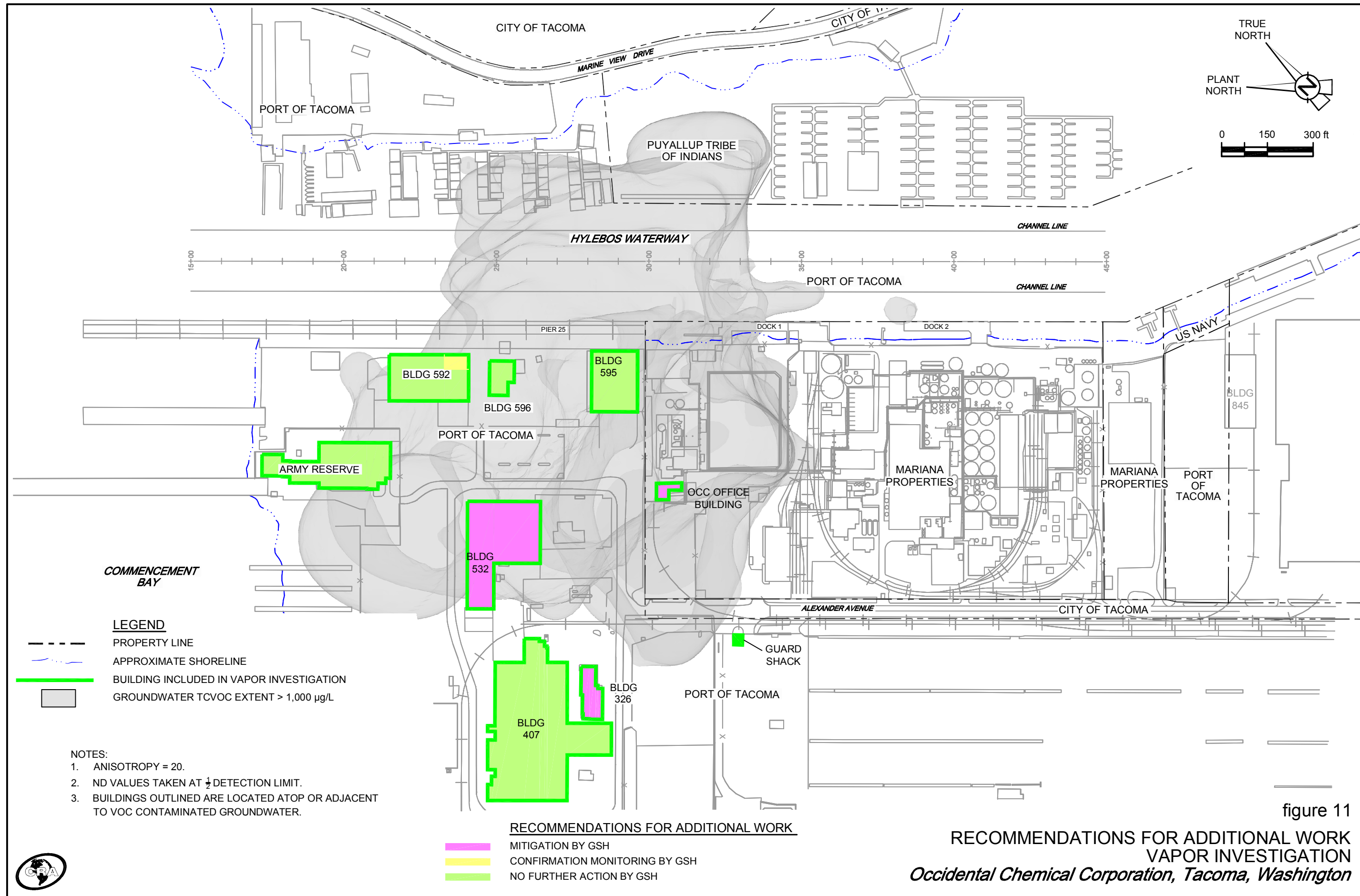


TABLE 1
SUMMARY OF INFORMATION FOR BUILDINGS
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

<i>Port of Tacoma Building</i>		<i>Building Properties</i>					<i>Heat, Ventilation, and Air Conditioning (HVAC) System</i>				
<i>Port of Tacoma Building Number</i>	<i>Tenant</i>	<i>Primary Building Use</i>	<i>Warehouse Size</i>	<i>Office Size</i>	<i>Applied Building Size (J&E Model)</i>	<i>Average Vapor Flow Rate Into Building, Q_{soil} (L/min)</i>	<i>Depth to Water Table, Lwt (cm)</i>	<i>HVAC</i>	<i>HVAC Details</i>	<i>Seasonal Variability (Yes/No)</i>	<i>Comments</i>
--	Army Reserve Facility	Office / Shop and Fleet Maintenance / Equipment storage	--	L - 192.35 ft (58.63 m) W - 96.18 ft (29.32 m) H - 10 ft (3.05 m)	L - 192.35 ft (58.63 m) W - 96.18 ft (29.32 m) H - 10 ft (3.05 m)	22	12 feet (3.66 meters) - Average depth to on-Site groundwater	Yes	No	No	Office space only. Floor plans and tour indicate mostly offices with a shop on the north end. Floor Plan only available as of today.
326	SafeBoats International/GR Silicate Nano-Fibers & Carbonates	Office	--	L - 50 ft (15.24 m) W - 50 ft (15.24 m) [Average] H - 12 ft (3.66 m) [Minimum] H - 8 ft (2.44 m)	L - 50 ft (15.24 m) W 50 ft (15.24 m) H - 8 ft (2.44 m)	7.6	12 feet (3.66 meters) - Average depth to on-Site groundwater	Yes	No	No	Office space only. Added by the Port - Occupies the eastern third of the building
407	GR Silicate Nano-Fibers & Carbonates, Trident Seafoods, and Citadel Marine	Warehouse with a few small shops / Paint bay / offices on the east side	L - 50 ft (15.24 m) W - 30 ft (9.14 m) H - 10 ft (3.05 m)	L - 25 ft (7.62 m) W - 20 ft (6.10 m) H - 10 ft (3.05 m)	L - 25 ft (7.62 m) W -20 ft (6.10 m) H - 10 ft (3.05 m)	5	12 feet (3.66 meters) - Average depth to on-Site groundwater	No	Not Available	Not Available	Added by the Port - Few shops on eastern side of structure are potentially over the plume
532	SafeBoats International/Port of Tacoma (RND 1 only)/Washington Industrial Coatings	Work shops/work areas with a few small offices	L - 400 ft (121.90 m) W - 146 ft (44.50 m) H - 31 ft (9.45 m)	L - 20 ft (6.10 m) W - 10 ft (3.05 m) H - 8 ft (2.44 m)	L - 20 ft (6.10 m) W -10 ft (3.05 m) H - 8 ft (2.44 m)	5	12 feet (3.66 meters) - Average depth to on-Site groundwater	Yes for small offices only	Not Available	No	Mostly open work shops with a few small offices. Some offices have base board heating only. A couple have small units for heating/cooling.
592	Trident Seafoods	Main Office / Warehouse / Machine Shop	L - 150 ft (45.72 m) W -250 ft (76.20 m) H - 25 ft (7.62 m)	L - 45 ft (13.71 m) W - 20 ft (6.10 m) H - 10 ft (3.05 m)	L - 45 ft (13.71 m) W - 20 ft (6.10 m) H - 10 ft (3.05 m)	5	12 feet (3.66 meters) - Average depth to on-Site groundwater	Yes - offices only	No	No	Added by the Port - Combined warehouse with offices on main floor and second floor
595	Trident Seafoods	Warehouse, small office on west wall	L - 200 ft (60.96 m) W -150 ft (45.72 m) H - 24 ft (7.32 m)	TBD (small - 1 desk)	L - 200 ft (60.96 m) W -150 ft (45.72 m) H - 24 ft (7.32 m)	27	12 feet (3.66 meters) - Average depth to on-Site groundwater	Not Available	Not Available	Not Available	
596	Trident Seafoods	Repair and Maintenance Building with a few small offices on east side	L - 73.75 ft (22.48 m) W - 73.75 ft (22.48 m) H - 8 ft (2.44 m)	L - 40 ft (12.19 m) W - 13.3 ft (4.05 m) H - 8 ft (2.44 m)	L - 40 ft (12.19 m) W - 13.3 ft (4.05 m) H - 8 ft (2.44 m)	5	12 feet (3.66 meters) - Average depth to on-Site groundwater	No	Not Available	Yes	Added by the Port - Repair and Maintenance Building - baseboard heating in some offices/lunchrooms. Windows open in the summer. Mostly shop facility.
Northern Guard Shack	TOTE	Office	--	TBD	Not Modeled	Not Modeled	12 feet (3.66 meters) - Average depth to on-Site groundwater	No	No	No	
OCC Service Building	GSH	Office, meeting room and records retention	Records Retention L - 80 ft (12.19 m) W - 24 ft (9.14 m) H - 9 ft (2.44 m)	L - 40 ft (12.19 m) W - 30 ft (9.14 m) H - 9 ft (2.44 m)	Not modeled	Not Modeled	12 feet (3.66 meters) - Average depth to on-Site groundwater	Yes	Not Available	No	

Notes:

All buildings are constructed with an industrial Slab-on-Grade floor.

L Building Floor Length

W Building Floor width

H Building Ceiling Height

TABLE 2

**LIST OF PARAMETERS AND SCREENING LEVELS
INDOOR AIR AND SOIL GAS
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON**

	CASRN	Method Reporting Limit (MRL) ⁽¹⁾ ($\mu\text{g}/\text{m}^3$)	EPA Regional Screening Levels Industrial Air Supporting ⁽²⁾				Indoor Air Short-term ⁽⁴⁾ NC	Updated DRAFT MTCA Method B Levels ⁽⁵⁾		Soil Gas (below slab) ⁽³⁾	
			Indoor Air		Soil Gas (below slab) ⁽³⁾			Indoor Air ⁽⁶⁾	Soil Gas (below slab) ⁽³⁾		
			C	NC	C	NC			C	NC	C
<i>Volatile Organic Compounds (VOCs)</i>											
Vinyl Chloride	75-01-4	0.1	2.8	440	28	4400		0.28	46	2.8	457
1,1-Dichloroethene	75-35-4	0.1	-	880	-	8800		-	91	-	914
Methylene Chloride	75-09-2	0.5	1200	2600	12000	26000		250	274	2500	2743
trans-1,2-Dichloroethene	156-60-5	0.1	-	260	-	2600		-	27	-	274
cis-1,2-Dichloroethene	156-59-2	0.1	-	-	-	-		-	-	-	-
Chloroform	67-66-3	0.1	0.53	430	5.3	4300		0.11	-	1.1	-
Benzene	71-43-2	0.1	1.6	130	16	1300		0.32	14	3.2	137
Carbon Tetrachloride	56-23-5	0.1	2	440	20	4400		0.42	46	4.2	457
Trichloroethene (TCE)	79-01-6	0.1	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1
1,1,2-Trichloroethane	79-00-5	0.1	0.77	0.88	7.7	8.8		0.16	-	1.6	-
Toluene	108-88-3	0.5	-	22000	-	220000		-	2286	-	22857
Tetrachloroethene	127-18-4	0.1	47	180	470	1800		9.6	18	96	183
Ethylbenzene	100-41-4	0.5	4.9	4400	49	44000		-	457	-	4571
m,p-Xylenes	1330-20-7	0.5	-	440	-	4400		-	46	-	457
o-Xylene	95-47-6	0.5	-	440	-	4400		-	46	-	457
1,1,2,2-Tetrachloroethane	79-34-5	0.025*	0.21	-	2.1	-		0.043	--	0.43	-
1,2,4-Trichlorobenzene	120-82-1	0.5	-	8.8	-	88		-	0.91	-	9.1
Naphthalene	91-20-3	0.1*	0.36	13	3.6	130		-	1.4	-	14
Hexachlorobutadiene	87-68-3	0.025*	0.56	-	5.6	-		0.11	-	1.1	-
1,1,1-Trichloroethane	71-55-6	0.1	-	22000	-	220000		-	2286	-	22857
1,2,4-Trimethylbenzene	95-63-6	0.5	-	31	-	310		-	3.2	-	32
1,4-Dichlorobenzene	106-46-7	0.1	1.1	3500	11	35000		-	366	-	3657
Styrene	100-42-5	0.5	-	4400	-	44000		-	457	-	4571
1,3,5-Trimethylbenzene	108-67-8	0.5	-	-	-	-		-	-	-	-

Notes:

- $\mu\text{g}/\text{m}^3$ Values in micrograms per cubic meter.
- C Refers to the substances toxicity as a carcinogen. (<http://www.epa.gov/region9/superfund/prg/>)
- NC Refers its toxicity as a non-carcinogen.
- (1) Low Level EPA Method TO-15. * Reporting limits for these parameters are for TO-15 Selective Ion Monitoring (SIM) analysis.
- (2) Regional Screening Level (RSL) Industrial Air Supporting Table November 2012.
- (3) Indoor air concentration $\times 0.1$
- (4) Short-term, non-cancer concentration is 8.4 $\mu\text{g}/\text{m}^3$, USEPA Region 10 Memorandum; OEA Recommendations Regarding Trichloroethylene Toxicity in Human Health Risk Assessments, Office of Environmental Assessment, December 13, 2012.
- (5) Updated MTCA Method B indoor air concentrations were derived using updated toxicity values included in USEPA's Integrated Risk Information System (IRIS) supplemented, as needed, with USEPA Preliminary Peer-Reviewed Toxicity Values (PPRTVs). This approach is consistent with the MTCA Regulation and as implemented by the Washington State Department of Ecology (Ecology) in its Cleanup Levels and Risk Calculation (CLARC) tool. The one exception was 1,1,2,2-tetrachloroethylene, for which the California EPA unit risk factor was used in order to be consistent with the draft 2009 Ecology VI guidance since there was no toxicity value available for this constituent.
- (6) Updated Indoor air concentrations were compared to CLARC Air, Method B criteria, and updated values were consistent with CLARC criteria with the exception of methylene chloride and trichloroethylene, for which revised IRIS toxicity values were developed by USEPA but not yet incorporated in the CLARC tool. Because no indoor air criteria are available for cis-1,2-dichloroethylene and 1,3,5-trimethylbenzene, surrogate criteria would need to be selected if indoor air concentrations are needed. Recommended surrogates are trans-1,2-dichloroethylene for cis-1,2-dichloroethylene and 1,2,4-trimethylbenzene for 1,3,5-trimethylbenzene.

TABLE 3
ANALYTICAL RESULTS - ARMY RESERVE FACILITY
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

										Round One									
										Indoor Air-17	Indoor Air-18	Indoor Air-22	Indoor Air-19	Outside Air-18	Sub-Slab Probe-17	Sub-Slab Probe-18	Sub-Slab Probe-19		
										IA-042213-RB-17	IA-042213-RB-18	IA-042213-RB-22	IA-042213-RB-19	OA-042313-RB-18	SS-042213-RB-17	SS-042213-RB-18	SS-042213-RB-19		
										4/23/2013	4/22/2013	4/23/2013	4/23/2013	4/24/2013	4/22/2013	4/22/2013	4/22/2013		
										(Re-sample of IA-18)									
Parameters	Units	EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)										
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)										
		C	NC	C	NC	NC	C	NC	C	NC									
		a	b	c	d	e	f	g	h	i									
Volatile Organic Compounds																			
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.089	0.049	0.072	0.11	0.032 J	1.6	0.19 J	1.2		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.038 U	0.041 U	0.040 U	0.039 U	0.042 U	0.24 U	0.20 U	0.038 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.16 U	0.16 U	0.15 U	0.17 U	0.94 U	0.81 U	0.15 U		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.010 J	0.041 U	0.040 U	0.039 U	0.042 U	0.24 U	0.20 U	0.038 U		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.038 U	0.041 U	0.040 U	0.039 U	0.042 U	0.24 U	0.20 U	0.038 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.3	0.82	0.86	0.80	0.81 J	4.7 U	4.0 U	0.76 U		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.40 J	0.30 J	0.30 J	0.27 J	0.83 U	4.7 U	4.0 U	0.76 U		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.054	0.14 J	0.15 J	0.16	0.022 J	0.24 U	0.20 U	0.038 U		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.69 ^f	0.43 ^f	0.67 ^f	0.67 ^f	0.72	0.71 U	0.60 U	0.11 U		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.51 ^f	0.31	0.46 ^f	0.46 ^f	0.48	1.6	1.9	6.5 ^h		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.11 J	0.13 J ^f	0.14 J ^f	0.18 ^f	0.089 J	0.25 J	0.54 J	0.79		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.038 U	0.041 U	0.040 U	0.039 U	0.042 U	0.24 U	0.20 U	0.038 U		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	1.4	1.4	0.94	1.1	1.1	0.045 J	0.047 J	0.049 J		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.038 U	0.041 U	0.040 U	0.039 U	0.042 U	0.24 U	0.20 U	0.038 U		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	4.9	5.3	3.2	3.9	3.8	0.15 J	0.15 J	0.20		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.91 U	0.82 U	0.80 U	0.77 U	0.83 U	4.7 UJ	4.0 UJ	0.76 UJ		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.62 ^a	0.081 J	0.17	0.095 J	0.077 J	0.94 U	0.81 U	0.057 J		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	1.7	1.6	1.2	1.3	1.3	0.050 J	0.056 J	0.065 J		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.40 J	0.82 U	0.80 U	0.23 J	0.83 U	4.7 U	4.0 U	0.76 U		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.21	0.23	0.36	0.60	0.14 J	0.70	5.0	5.4		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	4.9	1.2	2.2	2.5	2.1	0.94 U	0.81 U	0.27 J		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.050	0.041 U	0.040 U	0.017 J	0.042 U	0.24 U	0.20 U	0.038 U		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.074	0.054	0.033 J	0.045	0.033 J	0.084 J	1.3	0.23		
Vinyl chloride	µg/m ³	2.8	440	28	4400	-	0.28	46	2.8	0.095	0.072	0.066	0.11	0.042 U	0.24 U	0.20 U	0.038 U		

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

UJ Not detected; associated reporting limit is estimated.

- No criteria value established for parameter.

0.69^f Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 3
ANALYTICAL RESULTS - ARMY RESERVE FACILITY
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

										<i>Round Three</i>										
										Indoor Air-17	Indoor Air-18	Indoor Air-19	Indoor Air-19P	Indoor Air-29	Indoor Air-30	Indoor Air-31	Outside Air-18	Outside Air-18P	Outside Air-30	Sub-Slab Probe-17
										IA-031314-NH-17	IA-031314-NH-18	IA-031314-MD-19	IA-031814-RB-19p	IA-031314-MD-29	IA-031414-RB-30	IA-031414-RB-31	OA-031314-MD-18	OA-031814-RB-18p	OA-031414-RB-30	SS-031314-NH-17
										3/14/2014	3/14/2014	3/14/2014	3/18/2014	3/14/2014	3/15/2014	3/15/2014	3/14/2014	3/18/2014	3/15/2014	3/13/2014
Parameters	Units	EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)											
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)											
		C	NC	C	NC	NC	C	NC	C	NC										
		a	b	c	d	e	f	g	h	i										
Volatile Organic Compounds																				
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.064	0.028 J	0.067	0.049	0.047	0.058	0.080	0.021 J	0.027	0.022 J	1.0
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.035 U	0.036 U	0.038 U	-	0.037 U	0.037 U	0.042 U	0.038 U	-	0.036 U	0.20 U
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.14 U	0.15 U	0.15 U	-	0.15 U	0.15 U	0.17 U	0.15 U	-	0.14 U	0.79 U
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.035 U	0.036 U	0.038 U	-	0.037 U	0.037 U	0.042 U	0.038 U	-	0.036 U	0.20 U
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.035 U	0.067	0.038 U	-	0.020 J	0.037 U	0.042 U	0.038 U	-	0.036 U	0.20 U
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.1	0.72	0.51	0.27	0.82	1.0	0.98	0.22	0.16	0.27	0.084 J
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.35	0.21	0.14 J	-	0.25	0.28	0.27	0.062 J	-	0.087 J	0.79 U
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.061	0.059	0.089	0.093	0.054	0.024 J	0.025 J	0.023 J	-	0.023 J	0.20 U
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	1.1 ^f	0.87 ^f	0.80 ^f	0.64 ^f	0.96 ^f	1.2 ^f	1.1 ^f	0.62	0.75	0.62	0.59 U
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.47 ^f	0.43 ^f	0.48 ^f	-	0.47 ^f	0.42	0.43 ^f	0.48	-	0.45	1.2
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.10 J	0.10 J	0.094 J	-	0.098 J	0.096 J	0.10 J	0.082 J	-	0.085 J	0.18 J
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.033 J	0.040	0.040	-	0.030 J	0.079	0.080	0.027 J	-	0.098	0.20 U
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	1.2	1.0	0.82	1.0	1.1	1.8	1.8	0.74	1.1	1.6	0.081 J
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.035 U	0.036 U	0.038 U	-	0.037 U	0.037 U	0.042 U	0.038 U	-	0.036 U	0.20 U
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	4.3	3.9	3.0	3.8	4.1	7.4	6.7	2.8	4.0	6.5	0.23 J
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.50	0.41	0.36	-	0.60	0.32	0.60	0.40	-	0.31	0.79 U
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.35	0.28	0.17	-	0.32	0.90 ^a	0.29	0.10 J	-	0.14 J	0.14 J
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	1.5	1.3	1.0	1.2	1.4	2.1	2.0	0.93	1.2	1.8	0.098 J
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.47	0.40	0.24	0.15	0.39	0.22	0.30	0.17	0.13	0.16	0.79 U
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.19	0.29	0.20	0.16	0.55	0.16	0.32	0.18	0.16	0.13	1.0
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	4.8	2.9	2.5	2.2	4.1	4.2	4.4	3.1	1.8	2.1	1.1
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.035 U	0.036 U	0.011 J	-	0.037 U	0.011 J	0.013 J	0.038 U	-	0.012 J	0.20 U
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.076	0.099	0.13	0.095	0.30	2.6 ^{fs}	2.9 ^{fs}	0.073	0.076	0.17	0.42
Vinyl chloride	µg/m ³	2.8	440	28	4400	-	0.28	46	2.8	0.049	0.026 J	0.038	-	0.042	0.040	0.042	0.012 J	-	0.044	0.20 U

- Notes:
- J Estimated concentration.
 - U Not detected above the associated reporting limit.
 - UJ Not detected; associated reporting limit is estimated.
 - No criteria value established for parameter.
 - 0.69^f Result exceeds criteria identified in superscript.
 - Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.
 - (1) Most recent, shallowest, and nearby data.

TABLE 3
ANALYTICAL RESULTS - ARMY RESERVE FACILITY
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round Three										Groundwater Sample (1)				
		EPA RSL		Soil Gas (Below Slab)		Indoor Air	MTCA		Soil Gas (Below Slab)		Sub-Slab Probe-18	Sub-Slab Probe-19	Sub-Slab Probe-29	Sub-Slab Probe-30	77C-25	
		Indoor Air		C		NC	Indoor Air		C		SS-031314-NH-18	SS-031314-MD-19	SS-031314-MD-29	SS-031414-NH-30	WG-071612-DJT-77C-25-126	
		C	NC	C	NC	NC	C	NC	C	NC	3/13/2014	3/13/2014	3/13/2014	3/14/2014	7/16/2012	
		a	b	c	d	e	f	g	h	i					25 ft BGS	
															(µg/L)	
Volatile Organic Compounds																
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.16	0.91	0.60	1.8	-		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.037 U	0.19 U	0.038 U	0.034 U	0.50 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.78 U	0.15 U	0.14 U	-		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.037 U	0.19 U	0.010 J	0.021 J	0.50 U		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.037 U	0.19 U	0.038 U	0.034 U	-		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	0.029 J	0.78 U	0.097 J	0.061 J	-		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.15 U	0.78 U	0.035 J	0.017 J	-		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.014 J	0.19 U	0.036 J	0.018 J	-		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.11 U	0.58 U	0.65	0.20	0.50 U		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	1.8	2.3	2.0	1.6	0.50 U		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.49	0.35 J	0.48	2.1 ^h	0.50 U		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.037 U	0.19 U	0.033 J	0.0089 J	3.4		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	0.039 J	0.78 U	0.087 J	0.067 J	0.50 U		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.037 U	0.19 U	0.038 U	0.034 U	-		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	0.13 J	0.15 J	0.31	0.27	0.11 J		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.15 U	0.78 U	0.33	0.14 U	2.0 U		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.087 J	0.19 J	0.096 J	0.12 J	-		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	0.047 J	0.072 J	0.15 J	0.11 J	0.50 U		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.15 U	0.78 U	0.093 J	0.059 J	-		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	4.5	5.1	3.4	30	0.64		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	1.5	2.6	0.40	0.12 J	0.090 J		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.012 J	0.19 U	0.016 J	0.034 U	0.26 J		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	1.6	0.45	0.37	100 ^{dh}	2.3		
Vinyl chloride	µg/m ³	2.8	440	28	4400	-	0.28	46	2.8	0.037 U	0.19 U	0.038 U	0.034 U	0.21 J		

Notes:

- J Estimated concentration.
- U Not detected above the associated reporting limit.
- UJ Not detected; associated reporting limit is estimated.
- No criteria value established for parameter.
- 0.69^f Result exceeds criteria identified in superscript.
- Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.
- (1) Most recent, shallowest, and nearby data.

TABLE 4
ANALYTICAL RESULTS - BUILDING 326
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units											Round One				
		EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)		Indoor Air-7	Indoor Air-8	Indoor Air-8	Outside Air-7	Sub-Slab Probe-7	
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		IA-042313-RB-7	FD-042313-RB-8	IA-042313-RB-8	OA-042313-RB-7	SS-042313-RB-7	
		C	NC	C	NC	NC	C	NC	C	NC	4/24/2013	4/24/2013	4/24/2013	4/24/2013	4/24/2013	
	a	b	c	d	e	f	g	h	i	(Duplicate)						
Volatile Organic Compounds																
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.032 J	0.030 J	0.029 J	0.028 J	1.2		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.039 U	0.035 U	0.036 U	0.040 U	0.039 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.16 U	0.14 U	0.14 U	0.16 U	0.16 U		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.022 J	0.040	0.042	0.040 U	0.012 J		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.039 U	0.035 U	0.036 U	0.040 U	0.039 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	4.7 ^g	1.0	0.98	1.2	0.78 U		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	1.5	0.31 J	0.32 J	0.38 J	0.78 U		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.14 J	2.0 ^a	1.9 ^a	0.038 J	0.035 J		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.71 ^f	0.68 ^f	0.76 ^f	0.76	0.12 U		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.45 ^f	0.48 ^f	0.44 ^f	0.47	0.14		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.19 ^f	0.26 ^f	0.26 ^f	0.095 J	0.15 J		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.039 U	0.035 U	0.036 U	0.040 U	0.039 U		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	1.0	1.4	1.2	0.77 J	0.043 J		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.039 U	0.035 U	0.036 U	0.040 U	0.026 J		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	2.9	4.3	3.7	2.3	0.13 J		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.78 U	0.69 U	0.72 U	0.79 U	0.78 U		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.16	0.21	0.23	0.15 J	0.087 J		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	1.1	1.8	1.3	0.89	0.035 J		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.35 J	0.45 J	0.51 J	0.79 U	0.78 U		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	4.1	0.66	0.63	0.13 J	12		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	2.6	3.2	3.9	2.6	0.26 J		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.039 U	0.035 U	0.051	0.040 U	0.039 U		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	3.9 ^{afg}	0.45	0.44	0.024 J	10 ^{hi}		
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.0042 J	0.0060 J	0.0057 J	0.040 U	0.039 U		

Notes:

- J Estimated concentration.
U Not detected above the associated reporting limit.
- No criteria value established for parameter.
4.7^g Result exceeds criteria identified in superscript.
(1) Most recent, shallowest, and nearby data.

TABLE 4
ANALYTICAL RESULTS - BUILDING 326
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round Two										Groundwater Sample (1)				
		EPA RSL		Soil Gas (Below Slab)		Indoor Air	MTCA		Soil Gas (Below Slab)		Indoor Air-7	Indoor Air-8	Indoor Air-28	Outside Air-7B	Sub-Slab Probe-7	34-25R
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		IA-070113-JW-7	IA-070113-JW-8	IA-070113-JW-28	OA-070113-JW-7	SS-062513-JW-7	WG-082012-AMK-34-25R-052
		C	NC	C	NC	NC	C	NC	C	NC	7/1/2013	7/1/2013	7/1/2013	7/1/2013	6/25/2013	8/20/2012
		a	b	c	d	e	f	g	h	i					25 ft BGS	
															(µg/L)	
Volatile Organic Compounds																
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.050 U	0.050 U	0.050 U	0.050 U	1.6	-	
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	-	-	-	-	0.037 J	25 U	
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	-	-	-	0.15 U	-	
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	-	-	-	-	0.019 J	15 J	
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	-	-	-	0.039 U	-	
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	16 ^g	1.8	10 ^g	0.71	0.77 U	-	
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	0.77 U	-	
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	1.3 ^a	58 ^j	2.2 ^a	0.61	0.063	-	
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.65 ^f	0.64 ^f	0.64 ^f	0.48	0.16	25 U	
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	-	-	-	-	0.14	25 U	
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	-	-	-	-	0.37	25 U	
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	0.039 U	840	
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	4.1	6.9 ^a	4.0	4.8	0.12 J	25 U	
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	-	-	-	0.039 U	-	
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	16	29	15	21	0.34	25 U	
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	-	-	-	-	0.37	11 J	
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	-	-	-	0.33	-	
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	5.6	9.5	5.0	6.8	0.17	25 U	
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	1.9	1.2	2.1	0.52	0.30 J	-	
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	6.9	0.79	4.9	0.082	15	25 U	
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	3.9	3.1	4.0	1.7	0.34	25 U	
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	-	-	-	-	0.020 J	290	
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1	3.1 ^{afg}	0.30	2.0 ^{fg}	0.037 U	14 ^{hi}	
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	-	-	-	-	0.0051 J	56	

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

4.7^g Result exceeds criteria identified in superscript.

(1) Most recent, shallowest, and nearby data.

TABLE 5
ANALYTICAL RESULTS - BUILDING 407
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round One																
		EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)		Indoor Air-6	Indoor Air-9	Indoor Air-10	Indoor Air-20	Outside Air-9	Sub-Slab Probe-6	Sub-Slab Probe-9	Sub-Slab Probe-10
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		IA-041813-RB-06	IA-041813-RB-09	IA-041813-RB-10	IA-041813-RB-20	OA-041813-RB-09	SS-041813-SL-6	SS-041813-SL-9	SS-041813-RB-10
		C	NC	C	NC	NC	C	NC	C	NC	C	C	C	C	C	C	C	C
a	b	c	d	e	f	g	h	i	4/19/2013	4/19/2013	4/19/2013	4/19/2013	4/19/2013	4/18/2013	4/18/2013	4/18/2013		
Volatile Organic Compounds																		
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.025 J	0.027 J	0.027 J	0.026 J	0.024 J	0.35	0.88	0.030 J	
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.036 U	0.037 U	0.042 U	0.035 U	0.037 U	0.036 U	0.036 U	0.037 U	
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.15 U	0.17 U	0.011 J	0.15 U	0.14 U	0.14 U	0.15 U	
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.036 U	0.037 U	0.042 U	0.0049 J	0.037 U	0.0067 J	0.0074 J	0.037 U	
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.036 U	0.037 U	0.042 U	0.035 U	0.037 U	0.036 U	0.036 U	0.037 U	
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	53 ^{bg}	56 ^{bg}	6.0 ^g	16 ^g	0.65 J	0.31 J	0.68 J	0.74 U	
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	17	17	1.9	4.7	0.74 U	0.71 U	0.71 U	0.74 U	
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.036 U	0.022 J	0.026 J	0.032 J	0.037 U	0.036 U	0.018 J	0.037 U	
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.60 ^f	0.95 ^f	0.82 ^f	0.99 ^f	0.40	0.11 U	0.11 U	0.11 U	
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.35	0.46 ^f	0.46 ^f	0.45 ^f	0.45	0.14 J	0.25	0.34	
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.11 J	0.15 U	0.12 J ^f	0.11 J	0.075 J	0.011 J	0.028 J	0.11 J	
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.036 U	0.037 U	0.042 U	0.016 J	0.037 U	0.036 U	0.036 U	0.037 U	
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	3.0	3.4	1.3	4.3	0.21	0.044 J	0.057 J	0.043 J	
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.036 U	0.037 U	0.042 U	0.035 U	0.037 U	0.34	1.7 ^h	0.26	
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	13	15	5.4	18	0.78	0.15	0.21	0.14 J	
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.73 U	0.74 U	0.84 U	0.71 UJ	0.74 U	0.71 U	0.71 U	0.74 U	
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.17	0.24	0.54 ^a	0.31	0.047 J	0.077 J	1.2	0.059 J	
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	7.6	7.8	2.0	6.1	0.29 J	0.068 J	0.097 J	0.079 J	
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	88	83	6.1	18	0.64 J	1.0	0.62 J	0.74 U	
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.062	0.24	0.12	0.15	0.082	63	2.8	0.53	
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	8.3	8.2	6.3	13	1.0	0.44 J	0.33 J	0.20	
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.036 U	0.037 U	0.042 U	0.024 J	0.037 U	0.036 U	0.036 U	0.037 U	
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.040	0.052	0.047	0.085	0.013 J	0.31	0.15	0.14	
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.036 U	0.037 U	0.042 U	0.0036 J	0.037 U	0.036 U	0.036 U	0.037 U	

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

UJ Not detected; associated reporting limit is estimated.

- No criteria value established for parameter.

53^{bg} Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 5
ANALYTICAL RESULTS - BUILDING 407
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

										Round Three										
										Indoor Air-6	Indoor Air-6P	Indoor Air-6P	Indoor Air-9	Indoor Air-10	Indoor Air-20A	Indoor Air-37	Indoor Air-38	Indoor Air-39	Outside Air-6	Outside Air-6
										IA-031814-NH-06	IA-031914-RB-06p	IA-031914-RB-FD3p	IA-031814-NH-09	IA-031814-NH-10	IA-031814-NH-20	IA-031814-NH-37	IA-031814-NH-38	IA-031814-NH-39	OA-031814-NH-06	OA-031814-NH-FD2
										3/19/2014	3/19/2014	3/19/2014	3/19/2014	3/19/2014	3/19/2014	3/19/2014	3/19/2014	3/19/2014	3/19/2014	3/19/2014
										(Duplicate)										
Parameters	Units	EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)											
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)											
		C	NC	C	NC	NC	C	NC	C	NC										
		a	b	c	d	e	f	g	h	i										
Volatile Organic Compounds																				
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.023 J	0.020	0.019 J	0.022 J	0.021 J	0.021 J	0.021 J	0.14 U	0.021 J	0.020 J	0.021 J
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.035 U	-	-	0.035 U	0.037 U	0.041 U	0.038 U	0.14 U	0.039 U	0.039 J	0.039 U
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.14 U	-	-	0.14 U	0.15 U	0.16 U	0.15 U	0.14 U	0.16 U	0.17 U	0.15 U
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.035 U	-	-	0.035 U	0.037 U	0.041 U	0.038 U	0.14 U	0.039 U	0.041 U	0.039 U
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.035 U	-	-	0.035 U	0.037 U	0.041 U	0.038 U	0.14 U	0.039 U	0.041 U	0.039 U
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	86 ^{bs}	8.5 J ^e	8.3 J ^e	70 ^{bs}	9.4 ^e	12 ^e	340 ^{bs}	730 ^{bs}	7.0 ^e	5.1	6.0
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	28	-	-	20	2.5	3.4	120	340	2.4	1.7 J	2.1 J
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.026 J	0.037 J	0.034 J	0.021 J	0.047	0.046	0.026 J	0.14 U	0.017 J	0.034 J	0.025 J
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	1.0 ^f	1.0 ^f	0.97 J ^f	1.1 ^f	1.3 ^f	1.3 ^f	1.2 ^f	1.3 ^f	0.95 ^f	0.66	0.68
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.46 ^f	-	-	0.47 ^f	0.46 ^f	0.47 ^f	0.46 ^f	0.17	0.39	0.47	0.47
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.085 J	-	-	0.082 J	0.082 J	0.090 J	0.085 J	0.083 J	0.081 J	0.12 J	0.10 J
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.012 J	-	-	0.010 J	0.022 J	0.040 J	0.011 J	0.14 U	0.017 J	0.057	0.037 J
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	6.1 ^a	5.6 J ^a	5.4 J ^a	12 ^a	5.3 ^a	3.0	21 ^a	36 ^a	2.9	1.0	1.1
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.035 U	-	-	0.035 U	0.037 U	0.041 U	0.038 U	0.14 U	0.039 U	0.041 U	0.039 U
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	19	14 J	14 J	41	18	9.8	71	150	11	3.5	4.1
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.33	-	-	0.42	0.49	0.34	0.39	0.57 U	0.39	0.38	0.34
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.56 ^a	-	-	0.94 ^a	0.34	1.7 ^{bs}	3.8 ^{bs}	19 ^{abg}	0.24	0.13 J	0.19
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	9.5	6.9 J	6.7 J	20	5.5	3.7	44	90 ^e	3.5	1.3	1.5
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	20	25 J	24 J	31	1.6	3.2	220	1400 ^e	1.6	1.7	1.9
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.24	0.29 J	0.28 J	0.18	0.32	0.32	0.19	0.35	0.20	0.42	0.37
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	3.3	5.2 J	5.0 J	3.4	4.7	4.5	6.4	16	3.4	1.9	1.8
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.035 U	-	-	0.035 U	0.037 U	0.041 U	0.038 U	0.14 U	0.039 U	0.041 U	0.039 U
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.087	0.031	0.030 J	0.066	0.14	0.14	0.059	0.077 J	0.074	0.80	0.51
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.011 J	-	-	0.035 U	0.049	0.012 J	0.011 J	0.14 U	0.019 J	0.041 U	0.039 U

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

UJ Not detected; associated reporting limit is estimated.

- No criteria value established for parameter.

53^{bs} Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 5
ANALYTICAL RESULTS - BUILDING 407
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round Three										Groundwater Samples (1)						
		EPA RSL		Soil Gas (Below Slab)		Indoor Air	MTCA		Soil Gas (Below Slab)		Outside Air-6P	Sub-Slab Probe-6	Sub-Slab Probe-9	Sub-Slab Probe-10	Sub-Slab Probe-37	85C-25	91C-25	
		C	NC	C	NC	NC	C	NC	C	NC	C	NC	C	NC	C	NC	WG-072012-DJT-85C-25-153	WG-071812-BW-91C-25-189
		a	b	c	d	e	f	g	h	i	3/19/2014	3/18/2014	3/18/2014	3/18/2014	3/18/2014	7/20/2012	7/18/2012	
Volatile Organic Compounds																		
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.022	0.32	0.79	0.030 J	4.1	-	-		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	-	0.034 U	0.037 U	0.039 U	0.033 U	0.50 U	0.50 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	0.14 U	0.15 U	0.16 U	0.13 U	-	-		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	-	0.034 U	0.037 U	0.039 U	0.060	0.50 U	0.50 U		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	0.034 U	0.037 U	0.039 U	0.033 U	-	-		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	0.44	0.64	0.33	0.049 J	32	-	-		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	0.20	0.12 J	0.016 J	8.6	-	-		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.038	0.013 J	0.033 J	0.024 J	0.19	-	-		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.62	0.11	0.32	0.11 J	0.43	0.50 U	0.50 U		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	-	0.15	0.27	0.32	0.16	0.50 U	0.50 U		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	-	0.0095 J	0.034 J	0.047 J	0.042 J	0.50 U	0.080 J		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	-	0.034 U	0.037 U	0.039 U	0.0084 J	0.78	0.50 U		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	1.1	0.080 J	0.068 J	0.081 J	1.3	0.50 U	0.080 J		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	0.034 U	0.037 U	0.039 U	0.033 U	-	-		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	4.1	0.16	0.25	0.23	3.3	0.50 U	0.24 J		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	-	0.14 U	0.15 U	0.24	2.9	2.0 U	2.0 U		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	0.11 J	0.26	0.066 J	2.4	-	-		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	1.2	0.084 J	0.11 J	0.093 J	1.6	0.50 U	0.21 J		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	2.7	0.13 J	0.53	0.078 J	8.9	-	-		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.15	57	0.69	0.49	7.1	0.50 U	0.50 U		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	1.6	0.14 U	0.19	0.42	6.1	0.50 U	0.17 J		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	-	0.034 U	0.037 U	0.039 U	0.013 J	0.50 U	0.50 U		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.021	0.10	0.022 J	0.080	0.40	0.50 U	0.50 U		
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	-	0.034 U	0.037 U	0.039 U	0.033 U	0.50 U	0.40 J		

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

UJ Not detected; associated reporting limit is estimated.

- No criteria value established for parameter.

53^{bg} Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 6
ANALYTICAL RESULTS - BUILDING 532
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units											Round One								
		EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)		Indoor Air-11	Indoor Air-12	Indoor Air-13	Outside Air-11	Outside Air-11	Outside Air-11B	Sub-Slab Probe-11	Sub-Slab Probe-12	Sub-Slab Probe-13	
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		IA-042513-RB-11	IA-041913-RB-12	IA-041913-RB-13	FD-041913-RB-11	OA-041913-RB-11	OA-042513-RB-11	SS-042513-RB-11	SS-041913-SL-12	SS-041913-SL-13	
		C	NC	C	NC	NC	C	NC	C	NC	C	NC	C	NC	C	NC	C	NC	C	NC
	a	b	c	d	e	f	g	h	i											
Volatile Organic Compounds																				
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.024 J	0.032 J	0.034 J	0.023 J	0.023 J	0.025 J	0.50	4.2	24		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.038 U	0.046 U	0.039 U	0.035 U	0.035 U	0.041 U	0.039 U	0.041 U	0.043 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.18 U	0.16 U	0.027 J	0.14 U	0.16 U	0.15 U	0.16 U	0.17 U		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.038 U	0.046 U	0.039 U	0.013 J	0.035 U	0.041 U	0.039 U	0.058	0.31		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.038 U	0.046 U	0.039 U	0.026 J	0.035 U	0.041 U	0.039 U	0.041 U	0.043 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	0.60 J	1.3	1.1	0.69 U	0.69 U	0.42 J	0.77 U	0.82 U	0.86 U		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.76 U	0.39 J	0.36 J	0.69 U	0.69 U	0.82 U	0.77 U	0.82 U	0.86 U		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.13 J	5.4 ^a	1.6 ^a	0.060 J	0.039 J	0.15 J	0.039 U	0.13 J	0.046		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.63 ^f	0.71 ^f	0.74 ^f	0.29	0.34	0.49	0.12 U	0.12	0.13 U		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.40	0.44 ^f	0.45 ^f	0.39	0.46	0.45	0.66	0.16	0.064		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.082 J	0.096 J	0.078 J	0.083 J	0.071 J	0.080 J	0.049 J	0.070 J	0.045 J		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.020 J	0.046 U	0.039 U	0.046 J	0.035 UJ	0.054	0.039 U	0.041 U	0.043 U		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	1.7	4.7	5.1 ^a	0.22 J	0.26 J	0.96	0.027 J	0.34 J	0.078 J		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.038 U	0.046 U	0.039 U	0.035 U	0.035 U	0.041 U	0.039 U	0.89	0.022 J		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	6.9	20	22	0.86	0.99	3.8	0.087 J	1.4	0.33		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.84 U	0.92 UJ	0.78 UJ	0.69 UJ	0.69 UJ	0.82 U	0.77 U	0.82 U	0.86 UJ		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.23	0.17 J	0.20	0.073 J	0.070 J	0.056 J	0.15 U	0.092 J	0.85		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	2.3	5.0	5.6	0.27 J	0.31 J	1.0	0.030 J	0.40 J	0.087 J		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.34 J	0.32 J	0.28 J	0.69 U	0.69 U	0.82 U	0.77 U	0.82 U	0.86 U		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.18	1.5	1.8	0.16 J	0.062 J	0.12 J	3.2	27	20		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	21	55	59	1.4	1.9	5.9	1.2	5.0	1.2		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.034 J	0.046 U	0.039 U	0.043 J	0.035 UJ	0.041 U	0.039 U	0.041 U	0.043 U		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.10	0.34	0.86 ^f	0.085 J	0.023 J	0.068	0.27	0.37	24 ^{hi}		
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.011 J	0.046 U	0.039 U	0.014 J	0.035 U	0.017 J	0.039 U	0.041 U	0.043 U		

Notes:

- J Estimated concentration.
- U Not detected above the associated reporting limit.
- No criteria value established for parameter.
- 0.63^f Result exceeds criteria identified in superscript.
- Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.
- (1) Most recent, shallowest, and nearby data.

TABLE 6
ANALYTICAL RESULTS - BUILDING 532
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round Two																	
		EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)		Indoor Air-11	Indoor Air-12	Indoor Air-13	Indoor Air-23	Indoor Air-27	Outside Air-11C	Sub-Slab Probe-11	Sub-Slab Probe-12	Sub-Slab Probe-13
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		IA-070113-JW-11	IA-070113-JW-12	IA-070113-JW-13	IA-070113-JW-23	IA-070113-JW-27	OA-070113-JW-11	SS-062513-JW-11	SS-062613-JW-12	SS-062613-JW-13
		C	NC	C	NC	NC	C	NC	C	NC	C	NC	C	NC	C	NC	C	NC	C
	a	b	c	d	e	f	g	h	i										
Volatile Organic Compounds																			
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.66	4.3	23	
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	-	-	-	-	-	-	0.038 U	0.035 U	0.036 U	
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	-	-	-	-	-	0.15 U	0.14 U	0.15 U	
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	-	-	-	-	-	-	0.028 J	0.057	0.29	
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	-	-	-	-	-	0.058	0.062	0.036 U	
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.9	1.6	1.6	2.9	2.1	0.49	0.76 U	0.69 U	0.73 U	
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.76 U	0.69 U	0.73 U	
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.69	2.2 ^a	2.2 ^a	87 J ^a	26 J ^a	0.050	0.10	0.12	0.066	
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.64 ^f	0.61 ^f	0.86 ^f	1.2 ^f	0.78 ^f	0.58	0.13	0.10 J	0.10 J	
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	-	-	-	-	-	-	0.79	0.10	0.062	
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	-	-	-	-	-	-	0.15 J	0.12 J	0.059 J	
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.060	0.051	0.036 U	
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	14 ^a	22 J ^a	27 J ^a	30 J ^a	26 J ^a	16 J	0.13 J	0.12 J	0.11 J	
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	-	-	-	-	-	0.038 U	0.020 J	0.036 U	
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	61 J	89 J	100 J	100 J	100 J	67 J	0.42	0.33	0.43	
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	-	-	-	-	-	-	0.13 J	0.17	0.035 J	
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	-	-	-	-	-	0.31	0.18	0.30	
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	21 J	32 J	40 J	43 J	40 J	23 J	0.25	0.18	0.28	
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	2.0	0.93	1.2	1.3	1.3	0.69	0.43 J	0.69 U	0.73 U	
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.37	0.24	0.19	0.43	0.31	0.084	5.0	30	27	
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	28 J	8.4	19 J	28 J	11	1.7	0.33	0.17	0.17	
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	-	-	-	-	-	-	0.063	0.053	0.036 U	
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.12	0.049	0.076	0.046	0.037 U	0.037 U	0.45	0.30	27 ^{hi}	
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	-	-	-	-	-	-	0.018 J	0.017 J	0.036 U	

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.63^f Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 6
ANALYTICAL RESULTS - BUILDING 532
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Groundwater Samples (1)											
		EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)		78C-25	61C-25	
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		WG-071912-SP-78C-25-132	WG-071712-BW-61C-25-100	
		C	NC	C	NC	NC	C	NC	C	NC	7/19/2012	7/17/2012	
		a	b	c	d	e	f	g	h	i	25 ft BGS	25 ft BGS	
											(µg/L)	(µg/L)	
Volatile Organic Compounds													
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	-	-	-	-
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.50 U	-	0.50 U	-
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	-	-	-
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.50 U	-	0.51	-
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	-	-	-
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	-	-	-	-
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	-	-	-	-
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.50 U	-	0.070 J	-
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.50 U	-	0.50 U	-
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.50 U	-	0.30 J	-
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	1.5	-	2.3	-
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	0.070 J	-	0.070 J	-
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	-	-	-
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	0.12 J	-	0.31 J	-
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	2.0 U	-	0.15 J	-
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	-	-	-
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	0.50 U	-	0.19 J	-
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	-	-	-	-
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.50 U	-	0.56	-
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.49 J	-	0.15 J	-
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.50 U	-	0.24 J	-
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.50 U	-	5.9	-
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	2.4	-	1.1	-

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.63¹ Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 7
ANALYTICAL RESULTS - BUILDING 592
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round One														
		EPA RSL		Soil Gas (Below Slab)		Indoor Air Short-Term	MTCA		Soil Gas (Below Slab)		Indoor Air-1	Indoor Air-1	Indoor Air-2	Outside Air-1	Sub-Slab Probe-1	Sub-Slab Probe-2
		Indoor Air	Indoor Air	C	NC	NC	Indoor Air	Indoor Air	C	NC	FD-042113-RB-1	IA-042113-RB-1	IA-042113-RB-2	OA-042113-JC-1	SS-042113-JC-1	SS-042113-JC-2
		C	NC	C	NC	NC	C	NC	C	NC	4/22/2013	4/22/2013	4/22/2013	4/22/2013	4/21/2013	4/21/2013
		a	b	c	d	e	f	g	h	i						
Volatile Organic Compounds																
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.11	0.11	0.10	0.026 J	21	0.59	
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.038 U	0.036 U	0.040 U	0.035 U	0.038 U	0.037 U	
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.14 U	0.16 U	0.0084 J	0.15 U	0.0075 J	
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.0070 J	0.0052 J	0.040 U	0.035 U	0.31	0.0068 J	
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.038 U	0.036 U	0.040 U	0.035 U	0.038 U	0.037 U	
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	2.0	2.1	1.3	0.28 J	0.76 U	0.73 U	
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.56 J	0.59 J	0.48 J	0.71 U	0.76 U	0.73 U	
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.055	0.053	0.022 J	0.027 J	0.038 U	0.033 J	
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	1.0 ^f	0.99 ^f	1.5 ^f	0.46	0.20	0.11 U	
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.46 ^f	0.47 ^f	0.47 ^f	0.50	0.25	0.36	
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.10 J	0.10 J	0.099 J	0.077 J	0.52	0.046 J	
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.038 U	0.036 U	0.040 U	0.021 J	0.038 U	0.018 J	
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	2.5	2.4	2.7	0.25 J	0.11 J	0.060 J	
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.038 U	0.036 U	0.040 U	0.035 U	0.038 U	0.026 J	
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	9.2	9.0	9.5	0.87	0.38	0.20	
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	1.6 J	1.6 J	1.3 UJ	0.71 UJ	0.76 UJ	0.73 UJ	
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.41 ^a	0.53 ^a	0.067 J	0.11 J	0.031 J	0.077 J	
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	3.0	2.7	3.0	0.31 J	0.12 J	0.066 J	
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.34 J	0.36 J	0.26 J	0.71 U	0.76 U	0.73 U	
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	1.1	1.1	0.95	0.13 J	18	19	
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	16	15	22	1.5	0.62 J	0.39 J	
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.038 U	0.036 U	0.040 U	0.035 U	0.038 U	0.037 U	
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1	7.3 ^{afg}	6.6 ^{afg}	13 ^{abefg}	0.38	0.48	4.5
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.038 U	0.036 U	0.040 U	0.035 U	0.038 U	0.037 U	

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

1.0^f Result exceeds criteria identified in superscript.

(1) Most recent, shallowest, and nearby data.

TABLE 7
ANALYTICAL RESULTS - BUILDING 592
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units											Round Two						
		EPA RSL		Soil Gas (Below Slab)		Indoor Air	MTCA		Soil Gas (Below Slab)		Indoor Air-1	Indoor Air-2	Indoor Air-24	Indoor Air-25	Outside Air-1B	Sub-Slab Probe-1	Sub-Slab Probe-2	
		Indoor Air		C	NC	NC	C	NC	C	NC	IA-070113-JW-1	IA-070113-JW-2	IA-070113-JW-24	IA-070113-JW-25	OA-070113-JW-1	SS-062913-JW-1	SS-062713-JW-2	
		a	b	c	d	e	f	g	h	i	7/1/2013	7/1/2013	7/1/2013	7/1/2013	7/1/2013	6/29/2013	6/27/2013	
Volatile Organic Compounds																		
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.053	0.068	0.050 U	0.050 U	0.050 U	20	0.35		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	-	-	-	-	-	0.038 U	0.040 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	-	-	-	-	0.15 U	0.16 U		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	-	-	-	-	-	0.33	0.0078 J		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	-	-	-	-	0.038 U	0.040 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	3.3 ^g	5.3 ^g	4.8 ^g	4.2 ^g	0.35	0.38 J	0.79 U		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	-	0.76 U	0.79 U		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.045 U	0.086	0.074	0.070	0.045 U	0.13	0.040 U		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	1.6 ^f	1.7 ^{af}	0.67 ^f	0.65 ^f	0.60	0.33	0.069 J		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	-	-	-	-	-	0.29	0.31		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	-	-	-	-	-	0.43	0.070 J		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	-	0.018 J	0.040 U		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	4.5	6.8 ^a	5.0 ^a	4.8	0.50	0.22	0.37		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	-	-	-	-	0.038 U	0.040 U		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	16	25	19	18	1.8	0.91	1.5		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	-	-	-	-	-	0.082 J	0.034 J		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	-	-	-	-	0.43	0.32		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	5.5	8.7	6.9	6.7	0.66	0.45	0.51		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	1.2	1.1	1.0	1.0	0.43	0.32 J	0.79 U		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	1.1	1.4	1.1	1.9	0.070	24	25		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	21 J	29 J	10	29 J	1.4	0.69	0.40		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	-	-	-	-	-	0.038 U	0.040 U		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1	1.5 ^{fg}	1.9 ^{fg}	1.2 ^{fg}	1.3 ^{fg}	0.48	0.13		
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	-	-	-	-	-	0.038 U	0.040 U		

Notes:
 J Estimated concentration.
 U Not detected above the associated reporting limit.
 - No criteria value established for parameter.
 1.0^f Result exceeds criteria identified in superscript.
 (1) Most recent, shallowest, and nearby data.

TABLE 7
ANALYTICAL RESULTS - BUILDING 592
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

										Round Three																	
										Indoor Air-1	Indoor Air-1	Indoor Air-2	Indoor Air-2P	Indoor Air-24	Indoor Air-25	Indoor Air-32	Indoor Air-33	Indoor Air-34									
										IA-031714-RB-01	IA-031714-NH-F001	IA-031714-NH-02	IA-031814-RB-02p	IA-031714-NH-24	IA-031714-NH-25	IA-031714-NH-32	IA-031714-NH-33	IA-031714-NH-34									
										3/18/2014	3/18/2014	3/18/2014	3/18/2014	3/18/2014	3/18/2014	3/18/2014	3/18/2014	3/18/2014									
										(Duplicate)																	
Parameters	Units	EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)																		
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)																		
		C	NC	C	NC	NC	C	NC	C	NC																	
										a	b	c	d	e	f	g	h	i									
Volatile Organic Compounds																											
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.070	0.072	0.058	0.034	0.035	0.058	0.024 J	0.030 J	0.045									
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.040 U	0.039 U	0.039 U	-	0.035 U	0.038 U	0.039 U	0.041	0.034 U									
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.16 U	0.16 U	0.15 U	-	0.14 U	0.15 U	0.15 U	0.15 U	0.13 U									
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.040 U	0.039 U	0.039 U	-	0.035 U	0.038 U	0.039 U	0.037 U	0.034 U									
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.040 U	0.039 U	0.039 U	-	0.015 J	0.038 U	0.039 U	0.037 U	0.034 U									
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.6	1.4	2.3	0.97 J	1.2	0.90	0.93	1.1	1.3									
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.54 J	0.40 J	0.76	-	0.39	0.31	0.32	0.38	0.42									
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.093	0.093	0.030 J	0.030 J	0.028 J	0.026 J	0.028 J	0.020 J	0.020 J									
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.85 ^f	0.82 ^f	1.1 ^f	0.92 ^f	0.87 ^f	0.83 ^f	0.76 ^f	0.83 ^f	1.1 ^f									
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.33 J	0.46 ^f	0.45 ^f	-	0.42	0.47 ^f	0.40	0.44 ^f	0.43 ^f									
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.11 J	0.11 J	0.22 ^f	-	0.13 ^f	0.11 J	0.082 J	0.093 J	0.11 J									
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.15	0.18	0.14	-	0.16	0.21	0.17	0.17	0.21									
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	2.4	2.2	3.1	2.6 J	2.3	1.7	5.2 ^a	1.9	1.8									
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.040 U	0.039 U	0.039 U	-	0.035 U	0.038 U	0.039 U	0.037 U	0.034 U									
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	8.5	7.5	11	7.8 J	8.1	6.0	22	6.4	6.7									
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.78	0.71	0.81	-	0.77	2.2	0.53	0.81	1.0									
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.39 ^J	0.53 ^a	0.48 ^a	-	0.31	0.76 ^a	0.28	0.39 ^a	0.24									
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	2.7	2.4	3.6	2.6 J	2.5	2.0	6.3	2.0	2.2									
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.35	0.28	0.26	0.23 J	0.26	0.37	0.99	0.24	0.22									
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	26 ^{fg}	23 ^{fg}	55 ^{afg}	21 ^{Jfg}	27 ^{fg}	55 ^{afg}	17 ^f	23 ^{fg}	38 ^{fg}									
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	7.8	7.6	11	8.5 J	6.6	6.6	4.6	7.7	6.6									
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.027 J	0.026 J	0.034 J	-	0.043	0.029 J	0.018 J	0.028 J	0.031 J									
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1	3.7 ^{afg}	3.4 ^{afg}	8.3 ^{afg}	2.2 ^{fg}	0.56	1.8 ^{fg}	0.38	0.88 ^f	0.85 ^f								
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.18	0.17	0.16	-	0.20	0.25	0.16	0.20	0.27									

Notes:
 J Estimated concentration.
 U Not detected above the associated reporting limit.
 - No criteria value established for parameter.
 1.0^f Result exceeds criteria identified in superscript.
 (1) Most recent, shallowest, and nearby data.

TABLE 7
ANALYTICAL RESULTS - BUILDING 592
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round Three														Groundwater Sample (1)		
		EPA RSL		Soil Gas (Below Slab)		Indoor Air	MTCA		Soil Gas (Below Slab)		Indoor Air-40B	Outside Air-1	Outside Air-1P	Sub-Slab Probe-1	Sub-Slab Probe-2	Sub-Slab Probe-24	Sub-Slab Probe-32	41C-25
		Indoor Air	Indoor Air	C	NC	NC	C	NC	C	NC	IA-031714-RB-40B	OA-031714-RB-01	OA-031814-RB-01p	SS-031714-NH-01	SS-031714-MD-02	SS-031714-NH-24	SS-031714-MD-32	WG-071612-BW-41C-25-067
		C	NC	C	NC	NC	C	NC	C	NC	3/18/2014	3/18/2014	3/18/2014	3/17/2014	3/17/2014	3/17/2014	3/17/2014	7/16/2012
		a	b	c	d	e	f	g	h	i								25 ft BGS
																		(µg/L)
Volatile Organic Compounds																		
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.031 J	0.021 J	0.0093 U	16	0.37	3.8	1.3	-	-
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.037 U	0.039 U	-	0.037 U	0.043 U	0.036 U	0.22 U	-	0.50 U
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.16 U	-	0.15 U	0.17 U	0.14 U	0.89 U	-	-
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.037 U	0.039 U	-	0.17	0.043 U	0.041	0.22 U	-	0.50 U
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.037 U	0.039 U	-	0.037 U	0.043 U	0.036 U	0.22 U	-	-
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.5	0.29	0.30	0.081 J	0.12 J	0.035 J	0.89 U	-	-
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.51	0.085 J	-	0.025 J	0.036 J	0.14 U	0.89 U	-	-
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.031 J	0.014 J	0.038	0.029 J	0.040 J	0.013 J	0.22 U	-	-
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.88 ^f	0.65	0.42	0.16	0.059 J	0.10 J	0.11 J	-	0.50 U
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.40	0.46	-	0.25	0.36	2.2	0.21 J	-	0.50 U
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.11 J	0.080 J	-	0.39	0.062 J	0.12 J	0.095 J	-	0.50 U
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.10	0.21	-	0.037 U	0.043 U	0.036 U	0.22 U	-	0.11 J
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	6.5 ^a	0.49	1.4	0.11 J	0.086 J	0.034 J	0.89 U	-	0.50 U
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.037 U	0.039 U	-	0.037 U	0.043 U	0.036 U	0.22 U	-	-
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	26	1.8	5.5	0.34	0.30	0.13 J	0.16 J	-	0.50 U
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.77	0.44	-	0.15 U	0.17 U	0.14 U	0.89 U	-	2.0 U
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.31	0.081 J	-	0.17	0.21	0.080 J	0.21 J	-	-
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	7.7	0.59	1.7	0.11 J	0.11 J	0.047 J	0.89 U	-	0.50 U
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.50	0.092 J	0.17	0.14 J	0.10 J	0.034 J	0.89 U	-	-
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	25 ^{fg}	0.41	0.26	18	23	6.9	2000 ^{dhi}	-	0.50 U
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	9.2	1.7	2.1	0.37	0.24	0.14 U	0.89 U	-	0.15 J
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.021 J	0.019 J	-	0.037 U	0.043 U	0.036 U	0.22 U	-	0.50 U
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.78 ^f	0.25	0.050	0.064	0.30	0.054	2.4	-	0.50 U
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.12	0.29	-	0.037 U	0.043 U	0.036 U	0.22 U	-	0.50 U

Notes:
 J Estimated concentration.
 U Not detected above the associated reporting limit.
 - No criteria value established for parameter.
 1.0^f Result exceeds criteria identified in superscript.
 (1) Most recent, shallowest, and nearby data.

TABLE 8
ANALYTICAL RESULTS - BUILDING 595
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units											Round One				
		EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)		Indoor Air-4	Indoor Air-5	Outside Air-4	Sub-Slab Probe-4	Sub-Slab Probe-5	
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		IA-042013-JC-4	IA-042013-JC-5	OA-042013-RB-4	SS-042013-JC-4	SS-042013-JC-5	
		C	NC	C	NC	NC	C	NC	C	NC	4/21/2013	4/21/2013	4/21/2013	4/20/2013	4/20/2013	
	a	b	c	d	e	f	g	h	i							
Volatile Organic Compounds																
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.024 J	0.028 J	0.023 J	8.0	1.8		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.038 U	0.037 U	0.037 U	1.2 U	1.3 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.0051 J	0.15 U	4.9 U	5.1 U		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.038 U	0.037 U	0.037 U	1.2 U	1.3 U		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.038 U	0.037 U	0.037 U	1.2 U	1.3 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.0	1.2	0.75 U	25 U	22 U		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.28 J	0.33 J	0.75 U	25 U	22 U		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.022 J	0.037 U	0.018 J	1.2 U	1.3 U		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.82 ^f	0.75 ^f	0.23	3.7 U	3.9 U		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.44 ^f	0.47 ^f	0.49	0.15 J	1.3 U		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.083 J	0.078 J	0.070 J	2.2 J ^h	1.4 J ^h		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.023 J	0.037 U	0.037 U	0.97 J	0.51 J		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	0.92	0.92	0.20	4.9 U	5.1 U		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.038 U	0.037 U	0.037 U	1.2 U	1.3 U		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	3.3	3.1	0.58 J	4.9 U	5.1 U		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.26	0.74 UJ	0.75 UJ	25 UJ	22 UJ		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.23	0.20	0.032 J	4.9 U	5.1 U		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	1.2	1.1	0.18	4.9 U	5.1 U		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.35 J	0.28 J	0.75 U	25 U	22 U		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.34	1.4	0.19	3800 ^{cdhi}	3600 ^{cdhi}		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	3.8	3.5	0.60 J	4.9 U	5.1 U		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.038 U	0.037 U	0.037 U	1.2 U	1.3 U		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.089	0.24	0.038	1600 ^{cdhi}	1500 ^{cdhi}		
Vinyl chloride	µg/m ³	2.8	440	28	4400	-	0.28	46	457	0.0040 J	0.037 U	0.037 U	1.2 U	1.3 U		

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.82^f Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in SS sample exceeds applicable SS screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 8
ANALYTICAL RESULTS - BUILDING 595
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round Two										Sub-Slab Probe-4	Sub-Slab Probe-5		
		EPA RSL		Indoor Air			MTCA		Indoor Air-4	Indoor Air-5	Indoor Air-26			Outside Air-4	
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		IA-070113-JW-4	IA-070113-JW-5	IA-070113-JW-26			OA-070113-JW-4	
		C	NC	C	NC	NC	C	NC	C	NC	C			NC	
	a	b	c	d	e	f	g	h	i						
Volatile Organic Compounds															
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.050 UJ	0.050 U	0.050 U	0.050 U	9.8	2.2 J
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	-	-	-	-	0.81 U	0.75 U
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	-	-	-	0.59 U	0.54 U
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	-	-	-	-	0.53 U	0.49 U
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	-	-	-	3.3 U	3.0 U
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	0.72 J	1.8	0.73	0.47	4.7 U	4.3 U
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	4.7 U	4.3 U
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.052 J	0.062	0.052	0.045 U	2.1 U	1.9 U
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.55 J ^f	0.56 ^f	0.55 ^f	0.70	6.9 J ^h	5.1 J ^h
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	-	-	-	-	0.50 U	0.46 U
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	-	-	-	-	3.2 J ^h	1.9 J ^h
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	1.7 U	1.6 U
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	1.6 J	2.1	1.5	1.5	0.79 U	0.73 U
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	-	-	-	1.6 U	1.5 U
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	5.6 J	7.0	5.1	6.1	1.7 U	1.5 U
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	-	-	-	-	1.6 U	1.5 U
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	-	-	-	3.1 U	2.9 U
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	2.2 J	2.7	2.0	0.86	0.76 U	0.70 U
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	1.7 J	1.8	1.8	0.61	4.7 U	4.3 U
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.64 J	1.0	0.55	1.0	7400 ^{cdhi}	5400 ^{cdhi}
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	3.5 J	5.2	16 J	2.0	2.6 J	2.5 J
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	-	-	-	-	1.9 U	1.7 U
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.27 J	0.40	0.30	0.24	2500 ^{cdhi}	1800 ^{cdhi}
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	-	-	-	-	0.43 U	0.40 U

Notes:

- J Estimated concentration.
- U Not detected above the associated reporting limit.
- No criteria value established for parameter.
- 0.82^f Result exceeds criteria identified in superscript.
- Reporting limit for non-detect parameter in SS sample exceeds applicable SS screening level.
- (1) Most recent, shallowest, and nearby data.

TABLE 8
ANALYTICAL RESULTS - BUILDING 595
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Sample Location:	Round Three																				
	Indoor Air-4		Indoor Air-5		Indoor Air-5P		Indoor Air-26		Indoor Air-36		Outside Air-4		Outside Air-5P		Sub-Slab Probe-4		Sub-Slab Probe-5		Sub-Slab Probe-26		
	IA-031214-MD-04		IA-031214-NH-05		IA-031814-RB-05p		IA-031214-MD-26		IA-031214-MD-36		OA-031214-MD-04		OA-031814-RB-05p		SS-031214-MD-04		SS-031214-MD-26		SS-031214-NH-05		
	3/13/2014		3/13/2014		3/18/2014		3/13/2014		3/13/2014		3/13/2014		3/18/2014		3/12/2014		3/12/2014		3/12/2014		
Parameters	Units	EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)												
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)												
		C	NC	C	NC	NC	C	NC	C	NC											
		a	b	c	d	e	f	g	h	i											
Volatile Organic Compounds																					
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.023 J	0.026 J	0.015	0.026 J	0.026 J	0.028 J	0.013	6.2	1.9	1.5		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.030 U	0.036 U	-	0.036 U	0.035 U	0.038 U	-	0.86 U	0.43 U	0.34 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.12 U	0.15 U	-	0.14 U	0.14 U	0.15 U	-	3.4 U	1.7 U	1.4 U		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.030 U	0.036 U	-	0.036 U	0.035 U	0.038 U	-	0.86 U	0.43 U	0.50		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.030 U	0.036 U	-	0.036 U	0.035 U	0.038 U	-	0.86 U	0.43 U	0.34 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	0.83	0.96	0.50 J	1.2	1.0	0.43	0.11	3.4 U	1.7 U	0.18 J		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.24	0.28	-	0.41	0.32	0.13 J	-	3.4 U	1.7 U	1.4 U		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.034	0.031 J	0.036 J	0.12	0.038	1.2	0.014	0.86 U	0.43 U	0.34 U		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	1.0 ^f	1.2 ^f	0.71 ^f	1.3 ^f	1.0 ^f	1.2	0.77	1.2 J	1.3	0.48 J		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.42	0.47 ^f	-	0.46 ^f	0.47 ^f	0.36	-	0.86 U	1.4	0.12 J		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.10 J	0.11 J	-	0.12 J ^f	0.11 J	0.094 J	-	1.8 J ^h	5.4 ^{ch}	1.1 J		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.042	0.056	-	0.054	0.055	0.057	-	0.71 J	2.1	0.37		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	1.1	1.5	2.4 J	1.5	1.5	0.91	1.5	3.4 U	1.7 U	0.22 J		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.030 U	0.036 U	-	0.036 U	0.035 U	0.020 J	-	0.86 U	0.43 U	0.34 U		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	4.0	4.9	8.3 J	5.5	5.2	3.1	5.2	3.4 U	0.38 J	0.57 J		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	2.1	0.57	-	0.51	0.46	0.56	-	3.4 U	1.7 U	1.4 U		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.41 ^a	0.11 J	-	0.19	0.19	0.19	-	3.4 U	0.17 J	0.12 J		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	1.4	1.7	2.5 J	1.8	1.7	0.90	1.4	3.4 U	0.30 J	0.20 J		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.38	0.43	0.39 J	0.65	0.62	0.33	0.14	3.4 U	1.7 U	1.4 U		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.57	1.1	1.5 J	0.65	2.6	2.0	0.29	3000 ^{cdhi}	1400 ^{cdhi}	2900 ^{cdhi}		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	6.3	6.6	4.6 J	6.3	6.3	2.9	1.8	0.59 J	0.86 J	2.5		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.030 U	0.0093 J	-	0.036 U	0.0090 J	0.0097 J	-	0.23 J	1.2	0.14 J		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	0.18	0.24	0.27	0.21	0.52	0.30	0.24	1400 ^{cdhi}	940 ^{cdhi}	940 ^{cdhi}		
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.017 J	0.026 J	-	0.021 J	0.024 J	0.024 J	-	0.86 U	0.43 U	0.34 U		

- Notes:
- J Estimated concentration.
 - U Not detected above the associated reporting limit.
 - No criteria value established for parameter.
 - 0.82^f Result exceeds criteria identified in superscript.
 - Reporting limit for non-detect parameter in SS sample exceeds applicable SS screening level.
 - (1) Most recent, shallowest, and nearby data.

TABLE 8
ANALYTICAL RESULTS - BUILDING 595
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Groundwater Sample (1)										Soil Samples (1)			
		EPA RSL		Indoor Air		MTCA		Soil Gas (Below Slab)		10-24	WMUR-04	WMUR-10	WMUR-03		
		Indoor Air		Soil Gas (Below Slab)		Indoor Air		Soil Gas (Below Slab)		WG-082112-AMK-10-24-503	S-061912-KB-WMUR04-001	S-091012-KB-WMUR10-001	S-061712-KB-WMUR03-001		
		C	NC	C	NC	NC	C	NC	C	NC	24 ft BGS	9 to 9 ft BGS	9 to 9 ft BGS	9.5 to 9.5 ft BGS	
		a	b	c	d	e	f	g	h	i	(µg/L)	(µg/kg)	(µg/kg)	(µg/kg)	
Volatile Organic Compounds															
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	-	-	-	-	-	-
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	2500 U	-	1.5 J	1.9 J	660 U	
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	-	-	-	-	
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	2500 U	5.4 U	5.6 U	660 U	660 U	
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	-	-	-	-	
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	-	-	-	-	-	
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	-	-	-	-	
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	-	-	-	-	-	
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	2500 U	5.4 U	5.6 U	660 U	660 U	
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	2500 U	0.36 J	5.6 U	660 U	660 U	
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	2500 U	0.35 J	5.6 U	660 U	660 U	
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	2500 U	0.60 J	1.1 J	660 U	660 U	
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	2500 U	5.4 U	5.6 U	660 U	660 U	
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	-	-	-	-	
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	2500 U	5.4 U	5.6 U	660 U	660 U	
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	2100 J	11 U	12 U	460 J	460 J	
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	-	-	-	-	
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	2500 U	5.4 U	5.6 U	660 U	660 U	
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	-	-	-	-	-	
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	170000	2400	110	42000	42000	
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	2500 U	0.21 J	1.4 J	660 U	660 U	
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	2500 U	5.4 U	5.6 U	660 U	660 U	
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	5600	30	12	1000	1000	
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	2500 U	0.43 J	5.6 U	660 U	660 U	

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.82^f Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in SS sample exceeds applicable SS screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 9
ANALYTICAL RESULTS - BUILDING 596
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round One										Round Two			Round Three					
		EPA RSL		Soil Gas (Below Slab)		Indoor Air Short-Term	MTCA		Soil Gas (Below Slab)		Indoor Air-3	Indoor Air-21	Outside Air-1	Sub-Slab Probe-3	Indoor Air-3	Indoor Air-21	Sub-Slab Probe-3	Indoor Air-3	Indoor Air-21	
		Indoor Air	Indoor Air	C	NC	NC	C	NC	C	NC	C	NC	C	NC	C	NC	C	NC	C	NC
		a	b	c	d	e	f	g	h	i										
Volatile Organic Compounds																				
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.34	2.8	0.026 J	0.70	0.34	0.65	0.74	0.65	0.79		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.041 U	0.038 U	0.035 U	0.039 U	-	-	0.038 U	0.038 U	0.037 U		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.17 U	0.15 U	0.0084 J	0.0060 J	-	-	0.15 U	0.15 U	0.15 U		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.041 U	0.017 J	0.035 U	0.039 U	-	-	0.015 J	0.038 U	0.010 J		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.041 U	0.038 U	0.035 U	0.039 U	-	-	0.038 U	0.038 U	0.037 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.0	1.9	0.28 J	0.78 U	2.2	4.4 ^g	0.76 U	1.2	1.2		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.30 J	0.52 J	0.71 U	0.78 U	-	-	0.76 U	0.37	0.35		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.18	2.7 ^a	0.027 J	0.027 J	1.1	6.5 ^a	0.046	0.34	0.73		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.85 ^f	1.1 ^f	0.46	0.18	1.3 ^f	0.82 ^f	0.54	1.4 ^f	1.3 ^f		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.48 ^f	0.48 ^f	0.50	0.32	-	-	0.31	0.47 ^f	0.46 ^f		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.27 ^f	0.088 J	0.077 J	0.041 J	-	-	0.079 J	0.13 ^f	0.085 J		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.032 J	0.035 J	0.021 J	0.039 U	-	-	0.038 U	0.051	0.046		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	2.6	2.2	0.25 J	0.081 J	8.4 ^a	9.9 ^a	0.53	4.8	4.9		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.041 U	0.038 U	0.035 U	0.097	-	-	0.038 U	0.038 U	0.037 U		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	9.8	8.5	0.87	0.31	32 J	37 J	1.8	18	19		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	5.5 J	75 J	0.71 UJ	0.78 UJ	-	-	0.59	11	26		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.37 ^a	0.46 ^a	0.11 J	0.079 J	-	-	0.32	0.70 ^a	0.71 ^a		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	3.3	2.5	0.31 J	0.12 J	12	13	0.70	5.6	5.4		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.29 J	0.46 J	0.71 U	0.78 U	1.8	2.2	0.55 J	0.55	0.48		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	2.9	12 ^f	0.13 J	26	3.0	13 ^f	35	1.2	2.6		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	11	25	1.5	0.34 J	20 J	37 J	2.5	9.5	13		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.025 J	0.14 J	0.035 U	0.039 U	-	-	0.038 U	0.053	0.13		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	6.6 ^{afg}	19 ^{abefg}	0.38	0.26	2.9 ^{fg}	15 ^{jabefg}	0.15	2.8 ^{fg}	7.1 ^{afg}		
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.0044 J	0.0048 J	0.035 U	0.039 U	-	-	0.038 U	0.021 J	0.018 J		

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.85^f Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 9
ANALYTICAL RESULTS - BUILDING 596
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	Round Three														Groundwater Sample (1)			
		EPA RSL		Soil Gas (Below Slab)		Indoor Air	MTCA		Soil Gas (Below Slab)		Indoor Air-21P	Indoor Air-35	Outside Air-3	Outside Air-3P	Outside Air-3AP	Sub-Slab Probe-3	Sub-Slab Probe-35	71-25	
		Indoor Air	Soil Gas (Below Slab)	Short-Term	Indoor Air	Soil Gas (Below Slab)	IA-032114-RB-21p	IA-031414-NH-35	OA-031414-MD-03	OA-031814-RB-03p	OA-032114-RB-03Ap	SS-031414-MD-03	SS-031414-NH-35	WG-072712-AMK-71-25-116					
		C	NC	C	NC	NC	C	NC	C	NC	C	NC	C	NC	C	NC	C	NC	7/27/2012
a	b	c	d	e	f	g	h	i										25 ft BGS	
																			(µg/L)
Volatile Organic Compounds																			
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	1.0 J	0.097	0.021 J	0.020	0.026	0.45	3.3	-	-	-
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	-	0.039 U	0.038 U	-	-	0.039 U	0.034 U	0.50 U	-	-
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	-	0.16 U	0.15 U	-	-	0.16 U	0.14 U	-	-	-
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	-	0.039 U	0.038 U	-	-	0.039 U	0.036	0.50 U	-	-
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	-	0.039 U	0.038 U	-	-	0.039 U	0.034 U	-	-	-
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	1.1 J	0.47	0.32	0.17	0.15	0.069 J	0.043 J	-	-	-
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	-	0.13 J	0.10 J	-	-	0.023 J	0.14 U	-	-	-
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	1.4 J ^a	0.052	0.026 J	0.026	0.044	0.032 J	0.024 J	-	-	-
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.93 J ^f	0.81 ^f	0.67	0.72	0.59	0.12 U	0.10 U	0.50 U	-	-
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	-	0.46 ^f	0.43	-	-	0.29	0.25	0.50 U	-	-
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	-	0.083 J	0.086 J	-	-	0.046 J	2.6 ^b	0.50 U	-	-
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	-	0.042	0.055	-	-	0.028 J	0.034 U	0.12 J	-	-
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	5.4 J ^a	5.5 ^a	4.2	1.4	1.8	0.037 J	0.073 J	0.11 J	-	-
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	-	0.039 U	0.038 U	-	-	0.039 U	0.034 U	-	-	-
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	13 J	21	17	5.1	6.5	0.15 J	0.26	0.12 J	-	-
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	-	2.6	0.39	-	-	0.16 U	0.18	2.0 U	-	-
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	-	0.24	0.15 J	-	-	0.16	0.077 J	-	-	-
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	7.1 J	6.1	4.9	1.6	2.0	0.054 J	0.084 J	0.50 U	-	-
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.40 J	0.17	0.23	0.19	0.23	0.073 J	0.14	-	-	-
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	2.1 J	0.55	0.18	0.21	0.22	28	69	0.50 U	-	-
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	8.3 J	3.4	2.0	1.9	1.3	0.098 J	0.52	0.50 U	-	-
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	-	0.029 J	0.038 U	-	-	0.039 U	0.034 U	0.50 U	-	-
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	4.8 J ^{afg}	1.5 ^{fg}	0.20	0.11	0.10	0.077	0.13	0.50 U	-	-
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	-	0.019 J	0.025 J	-	-	0.039 U	0.034 U	0.50 U	-	-

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.85^f Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in IA sample exceeds applicable IA screening level.

(1) Most recent, shallowest, and nearby data.

TABLE 10

ANALYTICAL RESULTS - GUARD SHACK
OCCIDENTAL CHEMICAL CORPORATION
TACOMA, WASHINGTON

Parameters	Units	<i>Round One</i>										
							<i>Indoor Air-14</i>	<i>Outside Air-14</i>				
		<i>Indoor Air</i>		<i>Soil Gas (Below Slab)</i>			<i>Indoor Air</i>	<i>MTCA</i>		<i>Soil Gas (Below Slab)</i>		
		<i>C</i>	<i>NC</i>	<i>C</i>	<i>NC</i>	<i>NC</i>	<i>C</i>	<i>NC</i>	<i>C</i>	<i>NC</i>	<i>C</i>	<i>NC</i>
		<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	<i>g</i>	<i>h</i>	<i>i</i>		
<i>Volatile Organic Compounds</i>												
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.029 J	0.031 J	
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.038 U	0.040 U	
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.15 U	0.16 U	
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.038 U	0.040 U	
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.038 U	0.040 U	
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	0.80	0.74 J	
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.26 J	0.81 U	
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.062	0.023 J	
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.79 ^f	0.75	
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.47 ^f	0.43	
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.11 J	0.099 J	
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.038 U	0.040 U	
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	0.58 J	0.54 J	
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.038 U	0.040 U	
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	1.7	1.6	
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.75 U	0.81 U	
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.20	0.12 J	
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	0.63 J	0.59 J	
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.23 J	0.81 U	
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	0.12 J	0.14	
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	2.2	2.3	
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.038 U	0.040 U	
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	9.1	0.025 J	0.029 J
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.038 U	0.040 U	

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.79^f Result exceeds criteria identified in superscript.

TABLE 11

ANALYTICAL RESULTS - OCC OFFICE BUILDING
 OCCIDENTAL CHEMICAL CORPORATION
 TACOMA, WASHINGTON

Parameters	Units											Round One				
		EPA RSL		Indoor Air			MTCA		Soil Gas (Below Slab)		Indoor Air-15	Indoor Air-16	Outside Air-15	Sub-Slab Probe-15	Sub-Slab Probe-16	
		Indoor Air		Soil Gas (Below Slab)		Short-Term	Indoor Air		Soil Gas (Below Slab)		IA-041813-SL-15	IA-041813-RB-16	OA-041813-RB-15	SS-041713-SL-15	SS-041713-RB-16	
		C	NC	C	NC	NC	C	NC	C	NC	4/18/2013	4/18/2013	4/18/2013	4/17/2013	4/17/2013	
		a	b	c	d	e	f	g	h	i						
Volatile Organic Compounds																
1,1,1-Trichloroethane	µg/m ³	-	22000	-	220000	-	2286	-	22857	0.027 J	0.034 J	0.025 J	74	62		
1,1,2,2-Tetrachloroethane	µg/m ³	0.21	-	2.1	-	0.043	-	0.43	-	0.034 U	0.038 U	0.039 U	13 ^{ch}	4.7 ^{Jch}		
1,1,2-Trichloroethane	µg/m ³	0.77	0.88	7.7	8.8	0.16	-	1.6	-	0.13 U	0.15 U	0.16 U	19 ^{Jcdh}	3.2 ^{Jh}		
1,1-Dichloroethene	µg/m ³	-	880	-	8800	-	91	-	914	0.034 U	0.038 U	0.039 U	5.6 J	1.5 J		
1,2,4-Trichlorobenzene	µg/m ³	-	8.8	-	88	-	0.91	-	9.1	0.034 U	0.038 U	0.039 U	8.2 U	5.6 U		
1,2,4-Trimethylbenzene	µg/m ³	-	31	-	310	-	3.2	-	32	0.59 J	0.54 J	0.78 U	160 U	110 U		
1,3,5-Trimethylbenzene	µg/m ³	-	-	-	-	-	-	-	-	0.67 U	0.76 U	0.78 U	160 U	110 U		
1,4-Dichlorobenzene	µg/m ³	1.1	3500	11	35000	-	366	-	3657	0.14	2.9 ^a	0.039 U	8.2 U	5.6 U		
Benzene	µg/m ³	1.6	130	16	1300	0.32	14	3.2	137	0.96 ^f	0.48 ^f	0.34	24 U	17 U		
Carbon tetrachloride	µg/m ³	2	440	20	4400	0.42	46	4.2	457	0.47 ^f	0.45 ^f	0.47	2.1 J	3.1 J		
Chloroform (Trichloromethane)	µg/m ³	0.53	430	5.3	4300	0.11	-	1.1	-	0.24 ^f	0.58 ^{af}	0.071 J	42 ^{ch}	28 ^{ch}		
cis-1,2-Dichloroethene	µg/m ³	-	-	-	-	-	-	-	-	0.071	0.038 U	0.024 J	97	9.4		
Ethylbenzene	µg/m ³	4.9	4400	49	44000	-	457	-	4571	0.59 J	0.23 J	0.13 J	33 U	5.2 J		
Hexachlorobutadiene	µg/m ³	0.56	-	5.6	-	0.11	-	1.1	-	0.046	0.021 J	0.039 U	29 ^{ch}	28 ^{ch}		
m&p-Xylenes	µg/m ³	-	-	-	-	-	-	-	-	1.7	0.88	0.44	33 U	3.8 J		
Methylene chloride	µg/m ³	1200	2600	12000	26000	250	274	2500	2743	0.67 U	0.76 U	0.78 U	160 U	110 U		
Naphthalene	µg/m ³	0.36	13	3.6	130	-	1.4	-	14	0.36	0.085 J	0.21	33 U	23 U		
o-Xylene	µg/m ³	-	440	-	4400	-	46	-	457	0.57 J	0.37 J	0.17	33 U	3.3 J		
Styrene	µg/m ³	-	4400	-	44000	-	457	-	4571	0.21 J	0.89	0.78 U	160 U	110 U		
Tetrachloroethene	µg/m ³	47	180	470	1800	9.6	18	96	183	8.8	0.70	0.27	30000 ^{cdhi}	21000 ^{cdhi}		
Toluene	µg/m ³	-	22000	-	220000	-	2286	-	22857	3.3	1.1	0.81	33 U	23 U		
trans-1,2-Dichloroethene	µg/m ³	-	260	-	2600	-	27	-	274	0.034 U	0.038 U	0.039 U	10	10		
Trichloroethene	µg/m ³	3	8.8	30	88	8.4	0.61	0.91	6.1	5.0 ^{afg}	0.24	0.046	18000 ^{cdhi}	6000 ^{cdhi}		
Vinyl chloride	µg/m ³	2.8	440	28	4400	0.28	46	2.8	457	0.034 U	0.038 U	0.039 U	8.2 U	5.6 U		

Notes:

J Estimated concentration.

U Not detected above the associated reporting limit.

- No criteria value established for parameter.

0.96^f Result exceeds criteria identified in superscript.

Reporting limit for non-detect parameter in SS sample exceeds applicable SS screening level.

TABLE 12

SUMMARY OF INDOOR SOURCES, INDOOR AIR SCREENING LEVEL EXCEEDANCES, AND RECOMMENDATIONS FOR ADDITIONAL WORK
 OCCIDENTAL CHEMICAL CORPORATION
 TACOMA, WASHINGTON

Building	Indoor Sources	IA Screening Level Exceedances										Highest IA TCE Concentration (µg/m ³)	Recommendation		
		1,2,4-TMB	1,4-DCB	BZ	CT	Chloroform	EB	Naphthalene	o-Xylene	Styrene	PCE			TCE	
ARF	vehicle operation and chemical storage/use in maintenance area. Individual material storage cages not reviewed			O/I	O	I		I				I/SS*	2.9	NFA by GSH	
326	no specific indoor sources; however, painting, carpeting, and new ceramic tile floors installed in last 2 years	I	I	O	O	I	O/I					SS	3.9	Mitigation by GSH	
407	paint bay operations, miscellaneous power and hand tools, parts washing tubs, chemical storage tanks, three flammable material storage lockers, paint cans, cleaning products, and miscellaneous building materials	I		O/I	O	I	I	I	I	I			0.14	NFA by GSH	
532	aerosol cans containing chemical cleaners, lubricants, paints, and diesel fuel		I	O	O		I					SS	0.86	Mitigation by GSH	
592	degreasers, chemical storage, gas cans, gasoline-operated equipment (forklifts), cleaning products, bins of metal waste shavings, oil/lubricant products, metal working tools and equipment	I		I/O	O	I/O	I	I				I	I	13	Monitor Shop Area by GSH
595	propane and diesel-powered vehicles (forklift and trucks)			O	O	O		I/O						0.52	NFA by GSH
596	numerous flammable storage lockers and stored chemicals including cleaners, and cutting oils	I	I	I/O	O	I/O	I/O	I				I	I	19	NFA by GSH
Guard Shack	none observed			O	O									0.025 J	NFA by GSH
OCC Office	none observed		I/SS	I/O/SS	O	SS						SS	5	Mitigation by GSH	
	Most Frequent Likely Source	I	I	O	O	I	I	I	I	I	I	I/SS			

Notes:

- I Likely indoor source.
- O Likely outdoor source.
- SS Likely sub-slab source.
- NFA by GSH No further action by GSH.
- IA concentration exceeds short-term criterion (8.4 µg/m³).
- SS* Likely sub-slab source unrelated to OCC site.