

## Mccann, Michael

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**From:** Mccann, Michael  
**Sent:** Monday, December 12, 2016 1:57 PM  
**To:** 'Collin Martin'  
**Subject:** New Albany Steam Cleaners SSDS Letter

Collin Martin, P.E., CHMM  
Senior Engineer  
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Dear Collin:

IDEM technical staff has completed their review of Environmental Forensic Investigations, Inc. (EnviroForensics) Sub-Slab Depressurization System (SSDS) Installation and Performance letter for the New Albany Steam Cleaners (NASC) located at 1935 West Street in New Albany, Indiana submitted September 20, 2016 (VFC# 80354863). IDEM review has found the following facts:

1. An SSDS was installed at the NASC site in October 2013 by Vapor Protection Services, a certified radon mitigation system installer, who advised EnviroForensics that an inspection of the SSDS should be conducted semi-annually to verify that the vapor mitigation system (VMS) components are operating properly (Attachment 1). This advice, if followed, more than meets the recommendations in IDEM's 2014 Vapor Remedy Selection and Implementation Draft Guidance.
2. An SSDS was installed at the Tumbleweed Grill in late September 2015 by Vapor Protection Services who advised EnviroForensics to perform routine visual inspection of all SSDS to verify that VMS components are operating properly without specifying what "routine" meant.
3. Vapor intrusion field sampling forms and VMS operation and maintenance field reports (Attachment 2) indicate that the SSDSs were operating properly during the periods under review, i.e. negative vacuum readings were recorded at the NASC on 7/21/14 and 2/1/2016 and at the Tumbleweed Grill on 2/1/2016.
4. Indoor air (IA) at the NASC and the Tumbleweed Grill met 2016 Remediation Closure Guide (RCG) Commercial Indoor Air Screening Levels (CIASL) during the 2/1/2016 IA sampling events.

IDEM technical staff review of Attachment 3. Sub-Slab Depressurization System Operation, Maintenance & Monitoring Manuals have also been completed. IDEM review has found the following:

1. EnviroForensics conducted post-mitigation indoor air sampling at the site building on July 21, 2014 and February 1, 2015 to evaluate the efficacy of the SSDS operation. The post mitigation IA samples were collected at the locations sampled previously. One IA sample contained a concentration of TCE above the RCG CIA SL. EnviroForensics suggests that this was most likely from a background source such as Picrin which was in use as a textile spot cleaner at the site during the July 2014 sampling event. Picrin is at least 75% TCE. For the 2016 sampling event, Picrin was removed approximately 72 hours before the IA sampling event. PCE and TCE were detected in IA above laboratory reporting limits but below their respective RCG C IA SLs. IDEM finds the SSDS is operating properly.
2. EnviroForensics' OM&M Manual for the NASC proposes to inspect the SSDS under winter worst case conditions consistent with Schedule 2 from Table 3 of IDEM's 2014 Vapor Remedy Selection and Implementation Guidance document; to sample IA under winter worst case conditions during the first, second, and fourth years of system operation and every other year thereafter until remedial activities have completed. When remedial activities have been completed, paired IA/SGss assessments will be conducted under both summer and winter worst case conditions to confirm that VI does not pose a risk to health. IDEM finds this is acceptable.

3. EnviroForensics conducted initial post-mitigation (SSDS) indoor air sampling at the Tumbleweed Grill building on February 1, 2016 to evaluate the efficacy of the SSDS operation. The post-mitigation indoor air samples collected at the structure were from the same sampling locations previously sampled. None of the IA samples collected during the February 2016 sampling event contained VOC concentrations above their respective RCG IA SLs. IDEM finds the SSDS is operating properly.
4. EnviroForensics' OM&M Manual for the Tumbleweed Grill proposes to inspect the SSDS under winter worst case conditions consistent with Schedule 1 from Table 3 of IDEM's 2014 Vapor Remedy Selection and Implementation Guidance document; to sample IA under winter worst case conditions during the first, second, and fifth years of system operation and every fifth year thereafter until remedial activities have completed. When remedial activities have completed paired IA/SGss assessments will be conducted under both summer and winter worst case conditions to confirm that VI does not pose a risk to health. IDEM finds this is acceptable.

IDEM has no further comments on the letter and finds the letter/report acceptable as submitted.

Sincerely,

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