



Department of Toxic Substances Control



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA

5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

July 11, 2005

Mr. Matthew F. Letany, Director
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REVIEW OF TECHNICAL MEMORANDUM FOR INDOOR AIR QUALITY (IAQ)
SAMPLING ACTIVITIES AT FOUR RESIDENCES ON THIRD STREET AND AT
NORCO HIGH SCHOOL, NORCO INTERMEDIATE SCHOOL, AND NORCO
ELEMENTARY SCHOOL, WYLE LABORATORIES, NORCO, CA

Dear Mr. Letany:

The Department of Toxic Substances Control (DTSC) has reviewed the Technical Memorandum (TM) for IAQ Sampling Activities at four residences on Third Street and at Norco High School, Norco Intermediate School, and Norco Elementary School, prepared by Environ, dated June 24, 2005 and received on June 27, 2005. The TM presents the IAQ sampling activities to be conducted at the four residences located at 965, 970, 975, and 998 Third Street, and at three schools in Norco to determine potential exposure to residents, students and staff from volatile organic compounds potentially migrating from the Site.

Based on its review, DTSC has identified discrepancies in the TM that require clarification and/or modification. Enclosed is a set of comments from DTSC's project team identifying these discrepancies. Wyle should submit a response to comments table and a revised document by July 18, 2005.

If you have any questions, please contact Mr. Rafat Abbasi, Project Manager, at (714) 484-5449 or me at (714) 484-5368.

Sincerely,

Shahir Haddad, P.E.
Unit Chief
Cypress Branch
School Property Evaluation and Cleanup Division

Enclosure

Mr. Matthew F. Letany

July 11, 2005

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Mr. Matthew F. Letany

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**DTSC COMMENTS
TECHNICAL MEMORANDUM
INDOOR AIR QUALITY (IAQ) SAMPLING ACTIVITIES AT FOUR
RESIDENCES ON THIRD STREET AND AT NORCO HIGH SCHOOL, NORCO
INTERMEDIATE SCHOOL, AND NORCO ELEMENTARY SCHOOL
WYLE LABORATORIES, NORCO**

The following DTSC staff reviewed and provided comments herein to the Technical Memorandum (Tech Memo). Please contact the Project Manager if you have any questions on the comments. Original comments from the DTSC Human and Ecological Risk Assessment (HERD) are available for review in DTSC project files.

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GENERAL COMMENTS

1. The Tech Memo proposes IAQ sampling at 965, 970, 975, and 998 Third Street. The Tech Memo should evaluate whether step-out samples are necessary to determine the extent of VOC contamination, and the presence or absence of VOC contamination on properties adjacent to the above impacted residences.
2. The steps outlined in the Tech Memo for soil gas sample collection at the three (3) schools are unclear. In the Scope of Work section for IAQ sampling at the three (3) schools in Norco, the Tech Memo states that soil gas samples will be screened using EPA method 8260B modified using an onsite laboratory and analyzed using EPA method TO-15 SIM using a stationary lab. The Tech Memo should clearly state the steps that will be followed for soil gas collection prior to and/or during IAQ sampling.
3. The Tech Memo proposes analysis of soil gas and indoor air samples for TCE and PCE only. DTSC requires analysis of soil gas and indoor air samples for TCE, PCE, vinyl chloride, and cis-, trans-DCE and other daughter products.
4. Wyle should instruct the laboratory to forward all laboratory reports directly to Wyle as soon as samples are analyzed. Wyle should review and forward data showing detects in soil gas and/or indoor air to DTSC immediately.

5. If soil gas or IAQ samples show detections, additional investigation and/or mitigation should be implemented. DTSC review and approval of additional work is required.

William Bosan, Ph.D.

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GENERAL COMMENTS

1. Page 3, IAQ Sampling at the Residences on Third Street: Because of the 3.4 ug/L TCE detection at 5-feet at ASG-17, HERD recommends continued soil gas monitoring at 955 Third Street. This continued monitoring can be done using a permanent soil gas probe adjacent to the foundation or using previous soil gas location ESG-59 located in the street.

In addition to analysis of TCE and PCE using EPA Method TO-15 SIM, HERD recommends targeting potential breakdown products, including cis- and trans-1,2-DCE and more importantly, vinyl chloride.

HERD does not concur with the conclusion that soil gas sampling does not have to be conducted since soil gas samples were collected recently at the proposed residences. As with the homes on Golden West Lane, HERD requires soil gas sampling at the same time as outdoor air and IAQ sampling. Please note that IAQ sampling will be conducted again in the late fall/early winter in order to evaluate indoor air through two major seasons. Therefore, HERD requires that permanent soil gas probes be installed adjacent to the foundation of each and every home where IAQ sampling will be performed.

2. Page 4, IAQ Sampling at Norco High School, Norco Intermediate School and Norco Elementary School: Given the size of the three schools, HERD recommends that two outdoor ambient air samples be collected at each school site. Additionally, the entire sampling process will have to be repeated for all three schools in the winter, preferably during Christmas break.

In order to provide more comprehensive soil gas coverage, HERD recommends the following additional soil gas sampling locations:

- 4 additional soil gas sampling locations at the High School (3 at the main building (library) and 1 at the PE Boys);

- 3 additional soil gas sampling locations at the middle school (1 at the south end of the easternmost classroom building, 1 near the classroom building at the midpoint of samples ASG-IS-3 and ASG-IS-5, and 1 near the classroom building at the midpoint of samples ASG-IAQ-5 and ASG-IAQ-2).
- 2 additional soil gas sampling locations at the elementary school (1 at the office building and 1 at south-easternmost end of the classroom building where sample location ASG-ES-3 is located).