

## MORASH, MELANIE

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**From:** MORASH, MELANIE  
**Sent:** Monday, July 25, 2016 4:33 PM  
**To:** Wes Hawthorne  
**Cc:** Cynthia Woo; Lawrence McGuire; Leslie Lundgren; Lora Battaglia; Rose Condit; Sabrina Morales; Wenqian Dou; Elizabeth Brown; Heather O'Cleirigh; Joseph Innamorati; Linda Niemeyer; Michele Yuen; Morgan Gilhuly; Nancy-Jeanne LeFevre; Peter Bennett; Peter Scaramella; Rebecca Mora; Shau Luen Barker; Shaun Moore; Todd Maiden; Wendy Feng; DIAZ, ALEJANDRO; Estrada, Thelma; Harris-Bishop, Rusty; LUEDERS, JESSE; Lyons, John; Maldonado, Lewis; MORASH, MELANIE; Parker, Heather; Plate, Mathew; Shaffer, Caleb; Stralka, Daniel; Yogi, David  
**Subject:** EPA Comments - Triple Site - The King's Academy - Mitigation Plan for Small Gym - Response requested by Wednesday, August 3rd

Good afternoon, Wes,

Thank you for considering EPA's previous comments and submitting this revised mitigation plan for the above-reference school building. EPA acknowledges the most recent response-to-comment letter but we still have the following three comments on the proposed approach.

Please consider the following set of comments and respond with a revised plan and response letter by Wednesday, August 3<sup>rd</sup>. These comments reiterate previous comments provided to Locus. We understand that you may have a different viewpoint in this area but we felt strongly the need for engaging with you on this topic one last time before approving the plan for this school building.

1. Page 1, Response to comment #1 – EPA does not believe that it is appropriate to compare the success of the sub-membrane depressurization system installed at RES# 84/85 with the potential outcome that may or may not be seen at the small gym. The overall coverage obtained at RES# 84/85 is essentially 100% because the system is a crawlspace and the membrane we are depressurizing can be seen as essentially the slab. We are able to control the overall coverage with perforated piping under the membrane.

The small gym has an existing slab and we will be attempting sub-slab depressurization, not sub-membrane depressurization. The overall radius of influence a GP501 or equivalent fan can provide can be anywhere from 10 feet to 60-70 feet depending on sub-slab materials. If tighter materials are encountered under the small gym slab, it is likely that the radius of influence of that system will be very low and may only cover 10-25% of the slab. If this scenario occurs, it is very likely that the system will be insufficient to lower indoor concentrations.

As we have communicated to you previously in writing and during meetings/calls, EPA believes that diagnostic testing should be done during initial system installation. Failing to do so risks the necessity of repeated visits to the school, increasing mobilization and oversight costs and appearing poorly before the school administration and parents if the system repeatedly fails to achieve the necessary radius of influence to successfully lower indoor air TCE concentrations to acceptable levels.

2. Page 2, Response to comment #5 – EPA feels that this plan does not clearly demonstrate an understanding of the difference between a sub-membrane and sub-slab system and how coverage is achieved. In EPA's opinion it is inappropriate to proceed directly with mitigation of a slab-on-grade structure without gathering data to determine how much coverage a single suction point provides.
3. Page 3, Response to comment #8 – See previous comment.

Regards,

Melanie Morash

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**From:** J. Wesley Hawthorne [mailto:[hawthornej@locustec.com](mailto:hawthornej@locustec.com)]  
**Sent:** Friday, June 17, 2016 5:05 PM  
**To:** MORASH, MELANIE <[morash.melanie@epa.gov](mailto:morash.melanie@epa.gov)>  
**Cc:** Plate, Mathew <[Plate.Mathew@epa.gov](mailto:Plate.Mathew@epa.gov)>; Shaffer, Caleb <[Shaffer.Caleb@epa.gov](mailto:Shaffer.Caleb@epa.gov)>; DIAZ, ALEJANDRO <[Diaz.Alejandro@epa.gov](mailto:Diaz.Alejandro@epa.gov)>; Cynthia Woo <[cynthia.woo@cbifederaleservices.com](mailto:cynthia.woo@cbifederaleservices.com)>; Lawrence McGuire <[l.mcguire@circlepoint.com](mailto:l.mcguire@circlepoint.com)>; Leslie Lundgren <[leslie.lundgren@cbifederaleservices.com](mailto:leslie.lundgren@cbifederaleservices.com)>; Lora Battaglia <[lora.battaglia@cbifederaleservices.com](mailto:lora.battaglia@cbifederaleservices.com)>; Rose Condit <[rose.condit@cbifederaleservices.com](mailto:rose.condit@cbifederaleservices.com)>; Sabrina Morales <[s.morales@circlepoint.com](mailto:s.morales@circlepoint.com)>; Wenqian Dou <[wenqian.dou@cbifederaleservices.com](mailto:wenqian.dou@cbifederaleservices.com)>; Elizabeth Brown <[elizabeth.c.brown@ngc.com](mailto:elizabeth.c.brown@ngc.com)>; Heather O'Cleirigh <[heather.ocleirigh@amd.com](mailto:heather.ocleirigh@amd.com)>; Joseph Innamorati <[joseph.innamorati@philips.com](mailto:joseph.innamorati@philips.com)>; Linda Niemeyer <[linda.niemeyer@ngc.com](mailto:linda.niemeyer@ngc.com)>; Michele Yuen <[myuen@reedsmith.com](mailto:myuen@reedsmith.com)>; Morgan Gilhuly <[rmg@bcltlaw.com](mailto:rmg@bcltlaw.com)>; Nancy-Jeanne LeFevre <[LeFevren@locustec.com](mailto:LeFevren@locustec.com)>; Peter Bennett <[pbennett@haleyaldrich.com](mailto:pbennett@haleyaldrich.com)>; Peter Scaramella <[pscaramella@haleyaldrich.com](mailto:pscaramella@haleyaldrich.com)>; Rebecca Mora <[rebecca.mora@aecom.com](mailto:rebecca.mora@aecom.com)>; Shau Luen Barker <[shauluen.barker@philips.com](mailto:shauluen.barker@philips.com)>; Shaun Moore <[shaun.moore@amd.com](mailto:shaun.moore@amd.com)>; Todd Maiden <[tm Maiden@reedsmith.com](mailto:tm Maiden@reedsmith.com)>; Wendy Feng <[wfeng@cov.com](mailto:wfeng@cov.com)>  
**Subject:** RE: EPA Comments - Triple Site - The King's Academy - Revised Mitigation Plan for Small Auxiliary Gym - Response requested by Friday, June 17th

Melanie:

Attached is a revised version of this mitigation plan, and a letter describing the changes made in response to each of these comments.

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