

John McCorkle

Thank you for all of the monumental time and effort that clearly has gone into the development of this document.

I'm concerned that there is inadequate discussion of the use of sub-slab sampling as part of a "Tier 1" VI Evaluation; only directly referring to its role in a "Tier 2" Evaluation. I do appreciate the concept that Ecology is distinguishing between Tier 1 and 2 by whether or not the work is occurring within a building or not; however, a sufficient amount of sub-slab data can be effectively used to answer the Tier 1 question: Are concentrations of volatile contaminants in the subsurface high enough to potentially result in unacceptable indoor air levels? Going straight to sub-slab sampling can be a cost-effective way of answering this question very quickly, without the need for drill rigs or other equipment (a small hole installed in a building floor can be less obtrusive and less costly), and without the challenges associated with background air (from ambient air or chemical storage).

I often use, and have seen widespread use of sub-slab samples as a screening tool (in a Tier 1 fashion) to determine whether indoor air sampling is warranted in a similar fashion to soil vapor probes (see the 2015 OSWER Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air - sections 6.3.2 and 6.4.3). They can be used to assess the direct pathway that such vapors would necessarily need to travel to enter indoor air and as such can be superior (if collected in appropriate frequency, volume, and location as described in the OSWER guidance) to soil gas samples particularly in sites with heterogenous or developed/disturbed soil conditions.

Thank you so much for considering my comment.