



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 8 2011

THE INSPECTOR GENERAL

MEMORANDUM

SUBJECT: Response to Corrective Action Plan for OIG Report No. 11-P-0048, *Vapor Intrusion Health Risks at Bannister Federal Complex Not a Concern for Buildings 50 and 52, Unknown for Other Buildings*


TO: Karl Brooks, Regional Administrator
Office of the Regional Administrator, Region 7

Thank you for your April 1, 2011, response to the subject report and the actions taken, ongoing, and planned by the Region 7 Environmental Services Division. Your response details the actions Region 7 has already taken or plans to take to implement recommendation 1. We accept the corrective action plan for recommendation 1, and will close recommendation 1.

Recommendation 2 calls for Region 7 to "assess the responsible agencies' efforts to fully evaluate the health risks from inhaling potentially contaminated air for all buildings over or within close proximity of contaminated ground water plumes at Bannister Federal Complex." We also accept the corrective action plan for recommendation 2, with the understanding that Region 7 will clarify in its written evaluation to DOE those non-GSA managed buildings over or within close proximity of contaminated ground water plumes for which DOE may or may not have provided data. As a result, we will also close recommendation 2.

We appreciate your commitment to address the OIG report recommendations. In accordance with OIG policy, we will periodically follow up to determine how well the Agency's ongoing and planned actions have addressed the recommendations.

If you or your staff have any questions regarding this memo, please contact Wade Najjum, Assistant Inspector General for Program Evaluation at (202) 566-0827, or Eric Lewis at (202) 566-2664.


Arthur A. Elkins, Jr.

Attachment

cc: Mathy Stanislaus , Assistant Administrator, OSWER
Ron Hammerschmidt, Director, Environmental Services Division, Region 7
Johnsie Webster , Audit Follow-up Coordinator, OSWER
Kathy Finazzo, Audit Follow-Up Coordinator, Region 7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAR 31 2011

OFFICE OF
THE REGIONAL ADMINISTRATOR

MEMORANDUM

SUBJECT: *Vapor Intrusion Health Risks at Bannister Federal Complex
Not a Concern for Buildings 50 and 52, Unknown for Other Buildings,
Report No. 11-P-0048, dated January 5, 2011*

FROM: Karl Brooks
Regional Administrator

TO: Arthur A. Elkins, Jr.
Inspector General

Thank you for the opportunity to review and respond to the Office of Inspector General (OIG) subject final audit report. As you may recall, in my November 24, 2010 response to the draft evaluation report, Region VII agreed to implement and had already undertaken efforts to address both recommendations. The following provides you with an updated status of corrective actions.

OIG Recommendation 1:

Test for additional VOCs listed in the appropriate EPA-approved analytical methods for all future air, soil, and ground water samples in and around buildings 50 and 52.

Region VII Corrective Action:

Region VII has completed a vapor intrusion investigation comprised of four rounds of sampling for volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs) in the indoor air and in the subsurface vapor in Buildings 50 and 52. The four separate rounds of indoor air and subsurface vapor samples were collected on February 4-8, 2010, March 26-28, 2010, August 6-8, 2010 and November 19-21, 2010. In all four rounds of sampling, Region VII tested for total VOCs and tested for PCB congeners. Total VOC results for Round 1 and 2 were obtained after the initial reports were issued from the contract laboratory which performed the analysis but previously only reported the parameters initially requested. The results from each of these total VOCs and PCB congeners sampling events did not reveal any human health exposure concerns from indoor air and ambient air in and around either building. A separate report presenting the data results and EPA's evaluation of the data results was prepared after each sampling



event. These vapor intrusion investigation reports may be viewed at the following URL www.epa.gov/region07/cleanup/bannister.

As a follow-up to the vapor intrusion investigation, Region VII conducted two additional investigations in the areas surrounding Buildings 50 and 52. The first investigation conducted on June 22-24, 2010, collected groundwater samples from existing monitoring wells. The groundwater samples were tested for total VOCs and metals. The results of this investigation confirmed the continuing presence of VOC contamination above the MCLs in 6 out of 14 groundwater monitoring wells that were sampled. The final report of this investigation may be viewed at the following URL www.epa.gov/region07/cleanup/bannister.

The second investigation in the areas surrounding Buildings 50 and 52 was conducted December 6-10, 2010. This investigation collected groundwater samples from existing monitoring wells, soil samples, and groundwater samples from the soil borings. The groundwater samples from the monitoring wells and the soil samples were tested for total VOCs, semi-volatile organic compounds (SVOCs), and metals. The groundwater samples collected from the soil borings were tested for SVOCs, metals and total PCBs. The results of this second investigation are currently being assembled into a report which will be completed and made publically available at the following URL www.epa.gov/region07/cleanup/bannister website by July 31, 2011.

OIG Recommendation 2:

As part of continuing oversight work, assess the responsible agencies' efforts to fully evaluate the health risks from inhaling potentially contaminated air for all buildings over or within close proximity of contaminated ground water plumes at Bannister Federal Complex.

Region VII Corrective Action:

The GSA is currently conducting a vapor intrusion investigation in Buildings 1, 2 and 4 at the Bannister Federal Complex. Region VII and GSA signed an Environmental Work Agreement on April 30, 2010, which establishes that Region VII will work with GSA on the vapor intrusion investigation. Region VII agreed to provide oversight on GSA's work to further investigate and manage environmental conditions at the Bannister Federal Complex. Region VII will evaluate the results of GSA's four rounds of sampling for total VOCs using the same consistent approach and assessment methodology utilized for evaluating Region VII's vapor intrusion investigation. Region VII's review of GSA's investigations will be made publically available at the following URL www.epa.gov/region07/cleanup/bannister once completed.

Region VII has also received indoor air monitoring results from the Department of Energy (DOE) and is currently evaluating DOE's report and assessment of the inhalation health risks at non-GSA managed buildings over or within close proximity of contaminated ground water plumes. Region VII will provide its written assessment to

DOE by July 31, 2011. Because the site is not an NPL site, Executive Order 12580 states DOE has the authority and responsibility to do environmental cleanup work. Region VII has therefore offered assistance as appropriate.

Should you have any questions concerning Region VII's corrective actions, please contact Ron Hammerschmidt, Division Director, and Environmental Services Division at (913) 551-7566, or Kathy Finazzo, Regional Audit Follow-Up Coordinator, at (913) 551-7833.