



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

Mr. Ed Clement, Senior Project Manager
Philips North America
15313 West 95th Street
Lenexa, Kansas 66219

RE: Amendment No. 1 to the Five-Year Corrective Measures Performance Evaluation Report for the
Former Townsend Industries Facility, Pleasant Hill, Iowa, November 2020
EPA ID No. IAD005277231

Dear Mr. Clement:

The U.S. Environmental Protection Agency Region 7 has reviewed the subject document received November 25, 2020, which provides your responses to the EPA's comments dated October 29, 2020, on the original Five-Year CMPE Report as well as change pages for that report. Your responses and the associated change pages for comments 1 through 5 are generally acceptable and hereby approved.

With respect to comment 6, the EPA continues to recommend that the post-ventilation re-equilibration period be extended to at least 24 hours prior to future indoor air sampling events. The 2015 OSWER technical guide for vapor intrusion sampling (OSWER 9200.2-154, June 2015), which your response references, does not include the concept of pre-sampling building ventilation. Instead, on page 94, it acknowledges the issue of indoor sources of vapor-forming chemicals and recommends removing them from the building at least 24 hours prior to sampling. While this is clearly impractical for the methyl methacrylate sources within the warehouse building which are key to the industrial processes occurring there, it does provide a precedent for the amount of time that should be allowed for re-equilibration prior to sampling. The other references you cite in your response deal with radon mitigation and do not supersede the OSWER technical guide. Your response also includes a valid concern about maintaining consistency in sampling methodology; however, the VI sampling program for this facility began in 2017 so the effect of a minor change in methodology this early in the program does not outweigh the need to collect representative samples in the long term. Future VI sampling reports should discuss this change in methodology and interpret any apparent changes in the indoor air sample results accordingly.

If you have any questions, please contact me at (913) 551-7324 or by email at gravatt.dan@epa.gov.

Sincerely,

Daniel Gravatt, PG
Project Manager
RCRA Direct Implementation Section
Land, Chemical & Redevelopment Division



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