



# The Vapor Intrusion Pathway

*Regional DNR Staff Training  
Fall 2011  
By Terry Evanson*



# Role of Technical Guidance

- Provides direction to regulated community on what/why/how to address technical topic
- Provides assurance to regulated community that agency will accept the approach set out in guidance
- Guidance is NOT enforceable in court. If regulated community chooses not to use guidance:
  - *DNR can not insist on specifics in guidance*
  - *Regulated community must provide alternative approach and show that approach is protective of human health, welfare & environment*



## DNR Authorities & VI

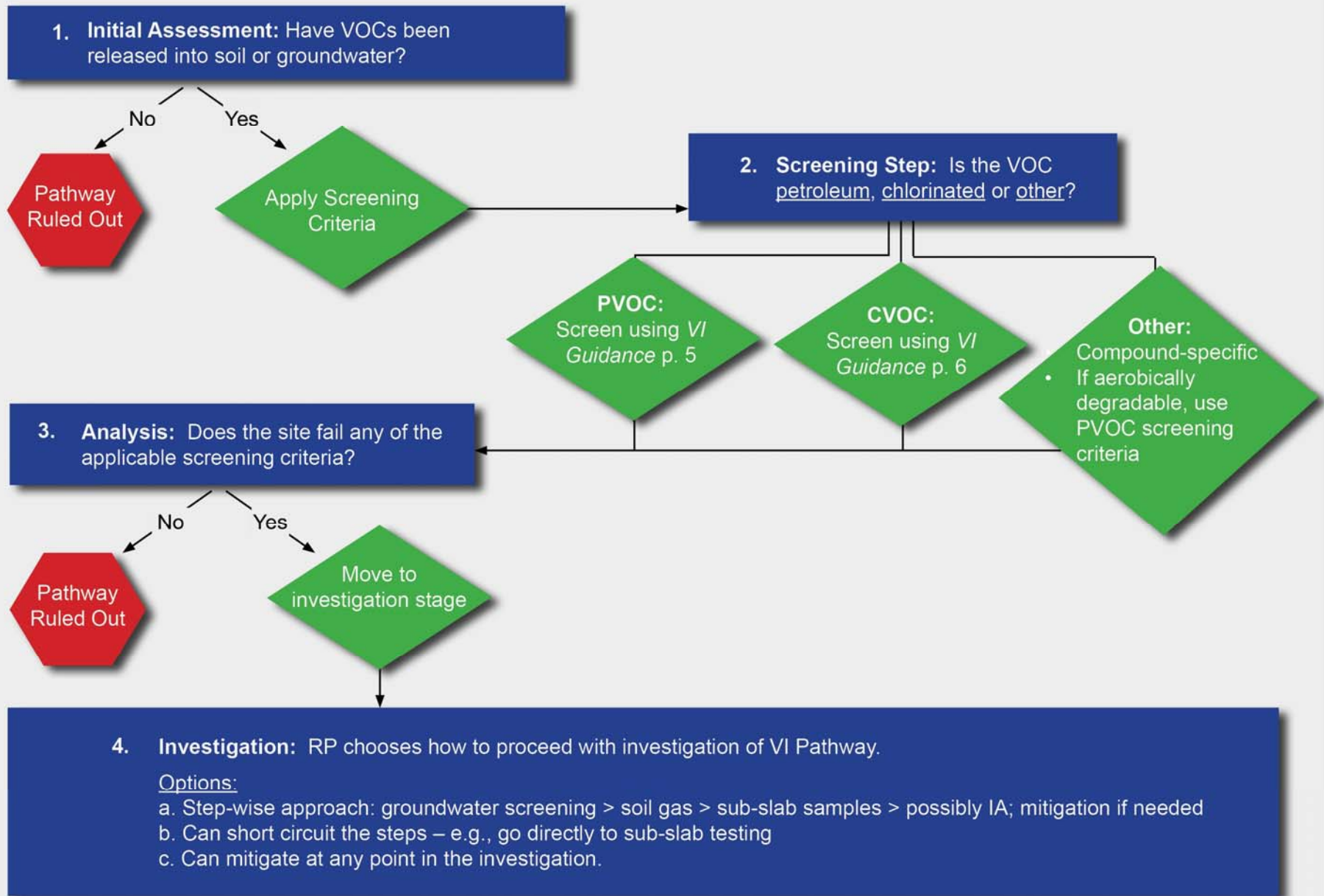
- NR 716.11(3)(a) must determine the “nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in **all** affected media”.
- NR 716.11(5) must include an evaluation of the “pathways for migration of the contamination, including drainage improvements, utility corridors, bedrock and permeable material or soil along which **vapors**, free product or contaminated water may flow”.
- NR 726.05(8)(a)3 department can require any other condition necessary to protect public health, welfare or the environment.
- NR 726.05(4)(a) department may not close a site that poses a threat to public health, safety.

# RR staff to contact when you have VI questions

- Regional Offices:
  - *NOR: Phil Richard – 715-762-1352*
  - *NER: Jennifer Borski – 920-424-7887*
  - *SER: Pam Mylotta – 414-263-8758*
  - *SCR: Jeff Ackerman – 608-275-3323*
  - *WCR: Tom Hvizdak – 715-421-7850*
- Central Office:
  - *Terry Evanson – 608-266-0941*
- DHS:
  - *Henry Nehls-Lowe – 608-266-3479*
  - *Rob Thiboldeaux – 608-267-6844*
  - *Bruce Rheineck – 608-267-3732*

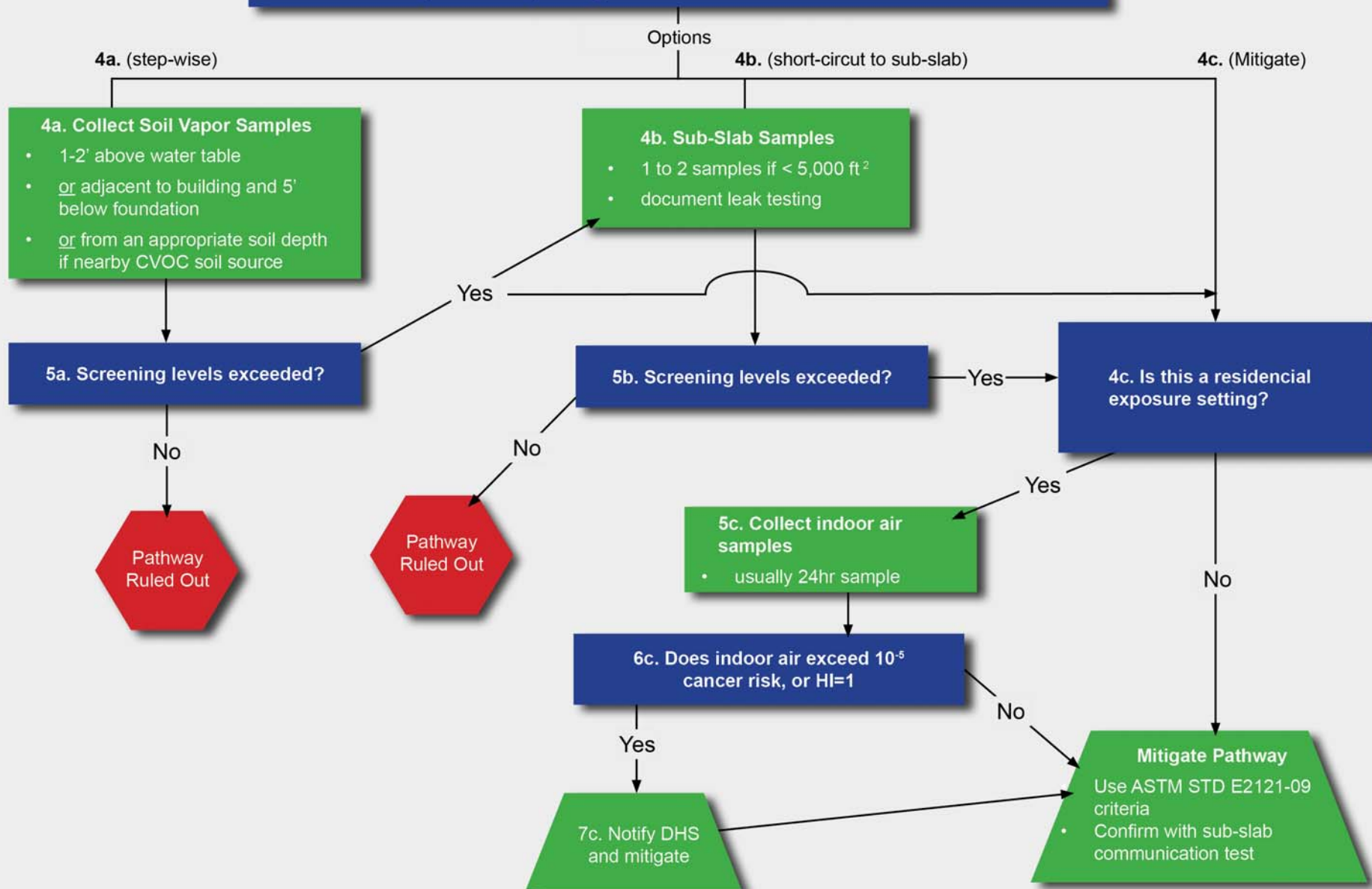


# Decision-Making Process for the Vapor Intrusion Pathway

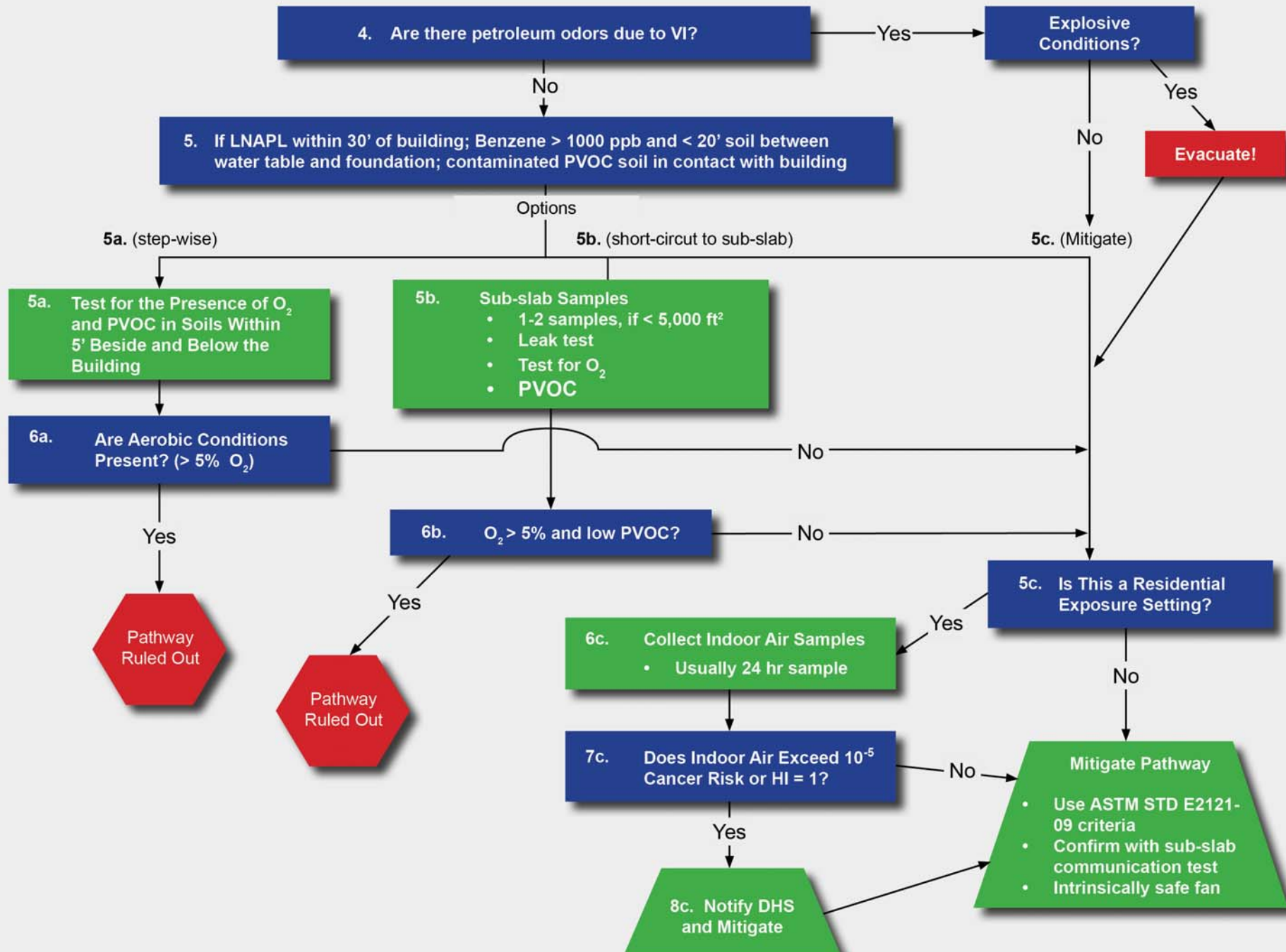


# Vapor Intrusion Pathway – Investigation of CVOC

- 4.
- Contaminant concentration at the watertable > screening value;
  - soil CVOC source within 100' of occupied building;
  - contaminated CVOC groundwater in contact with building;
  - preferential pathway.



# Vapor Intrusion Pathway – Investigation of PVOC

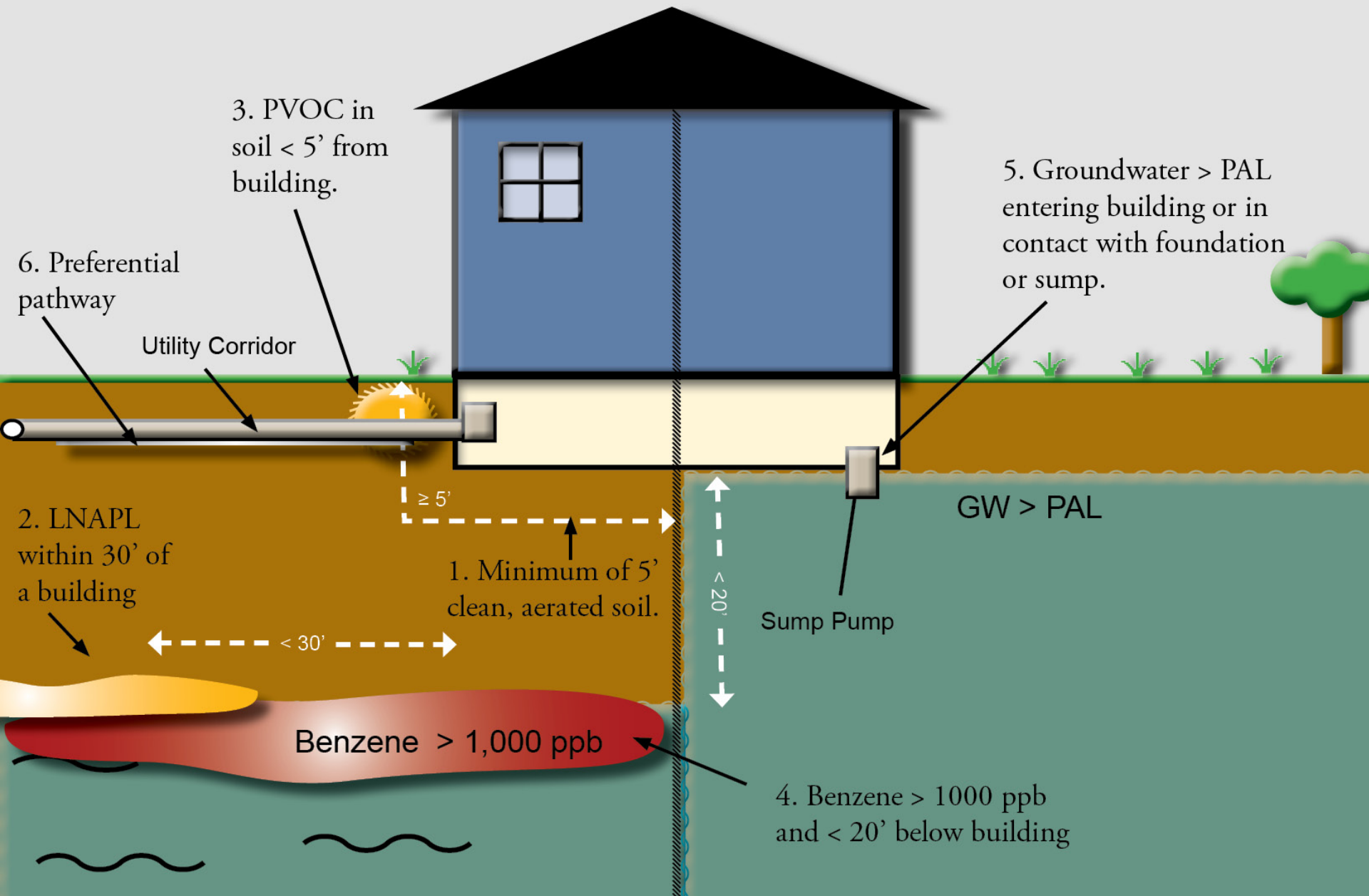


# Screening the VI Pathway

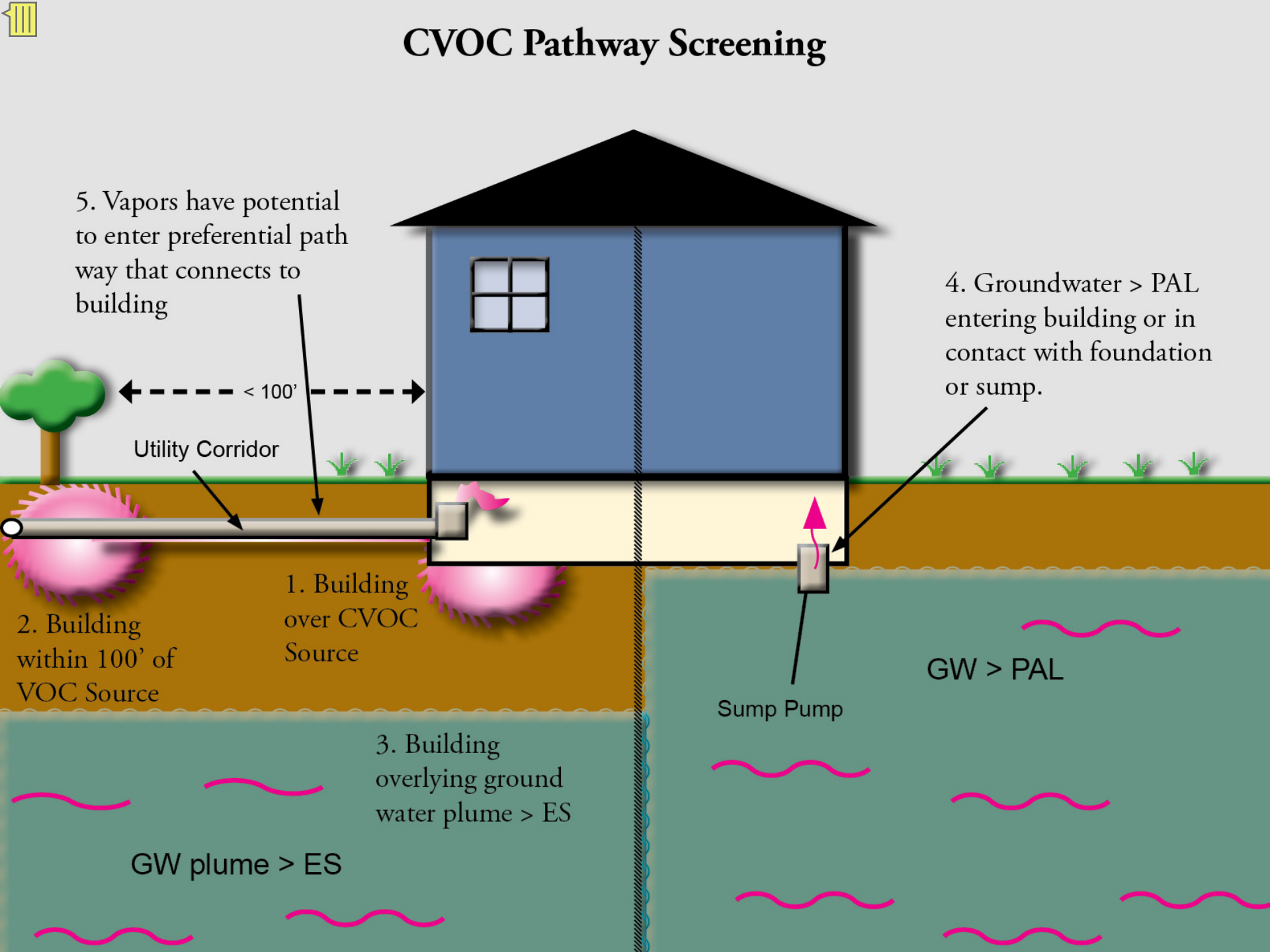




# PVOC Pathway Screening



# CVOC Pathway Screening



# VI Screening Calculator by Resty

[http://intranet.dnr.state.wi.us/int/aw/rr/gen\\_resources/tech.htm#vapor2](http://intranet.dnr.state.wi.us/int/aw/rr/gen_resources/tech.htm#vapor2)

## Wisconsin Vapor Intrusion Action/Screening Levels (Commercial)

1. Enter data in yellow cells. Only numeric values under Data; do not type "-", "NA" nor "space bar." Leave purple cells "as is."

2. After all entries, go to Row 872. Click **Get Summary Air**

Reference values (ug/m<sup>3</sup>) are from: [http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/Generic\\_Tables/index.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/index.htm). Unit conversion (ug/m<sup>3</sup> to ppb-v) uses ideal-gas molar volume at 1 atm and at the input indoor-air T. The NIOSH Pocket Guide (<http://www.cdc.gov/niosh/npg/pgintrod.html>) uses T of 25°C (=77°F). Program by Resty M. Pelayo, WDNR, RR/5, 608/267-3539. 8/24/2011.

INPUT OUTPUT

<<<--- --->>>

Are the data INDOOR-air concentrations? (yes / no):	yes	Alpha α:	Target Cancer Risk
	no	1	1.0E-05

Indoor-air Temperature (°F):	77 °F	@ 25.0 °C:
		Molar Volume for Ideal Gas
		24.47 L/mole

**Click here to Clear Entries below**

INDOOR-AIR: TCR=1.0E-5; ncTHQ=1; Alpha=1.0

Use either of the columns

Reference Values		Commercial Vapor Action Level (VAL)	VAL Basis ca: cancer nc: non-cancer (TCR=1e-5; THQ=1)
EPA RSL Table Values (ug/m <sup>3</sup> )	EPA RSL Table Values (ppb-v)		

ANALYTE	CAS_NO	MW	Reference Values		Commercial Vapor Action Level (VAL)	VAL Basis ca: cancer nc: non-cancer (TCR=1e-5; THQ=1)	Data	
			TCR_1e-6	THQ_1			ug/m <sup>3</sup>	ppb-v
Tetrachloroethylene	127-18-4	165.83	2.1E+00	1.2E+03	21.	3.1E+00	ca	
Trichloroethylene	79-01-6	131.39	6.1E+00	4.4E+01	44.	8.2E+00	nc	
Dichloroethylene, 1,2-trans-	156-60-5	96.94		2.6E+02	260.	6.6E+01	nc	
Vinyl Chloride	75-01-4	62.5	2.8E+00	4.4E+02	28.	1.1E+01	ca	
Trichloroethane, 1,1,1-	71-55-6	133.41		2.2E+04	22,000.	4.0E+03	nc	
Carbon Tetrachloride	56-23-5	153.82	2.0E+00	4.4E+02	20.	3.2E+00	ca	
Dichloroethylene, 1,1-	75-35-4	96.94		8.8E+02	880.	2.2E+02	nc	
Dichlorodifluoromethane	75-71-8	120.91		4.4E+02	440.	8.9E+01	nc	
Dichloroethane, 1,1-	75-34-3	98.96	7.7E+00		77.	1.9E+01	ca	
Dichloroethane, 1,2-	107-06-2	98.96	4.7E-01	3.1E+01	4.7	1.2E+00	ca	
Trichlorofluoromethane	75-69-4	137.37		3.1E+03	3,100.	5.5E+02	nc	

Data	
ug/m <sup>3</sup>	ppb-v

Flag E = Individual Exceedance!

Type BRRTS No. Here (If Known)

0

(Commercial) Exceedance Count

Type Other Pertinent info (max 256 char)



# Exposure Classification & Attenuation Factors

		Media		
	Exposure Classification	Groundwater	Soil gas >5' below foundation	Sub-slab or soil gas < 5' below foundation
<b>Land Use</b>				
Industrial/Lg Commercial	Industrial	0.0001	0.001	0.01
Commercial	Industrial	0.001	0.01	0.1
Residential & "sensitive populations"	Residential	0.001	0.01	0.1



# Role of DNR staff vs Consultants

- Consultants screen pathway & state in the SI report or Closure report that they have either:
  - *Ruled the VI pathway out OR*
  - *Addressed the VI pathway risk*
- DNR staff review conclusions of consultant. If staff disagree with the consultants conclusion, document additional investigation or action needed.

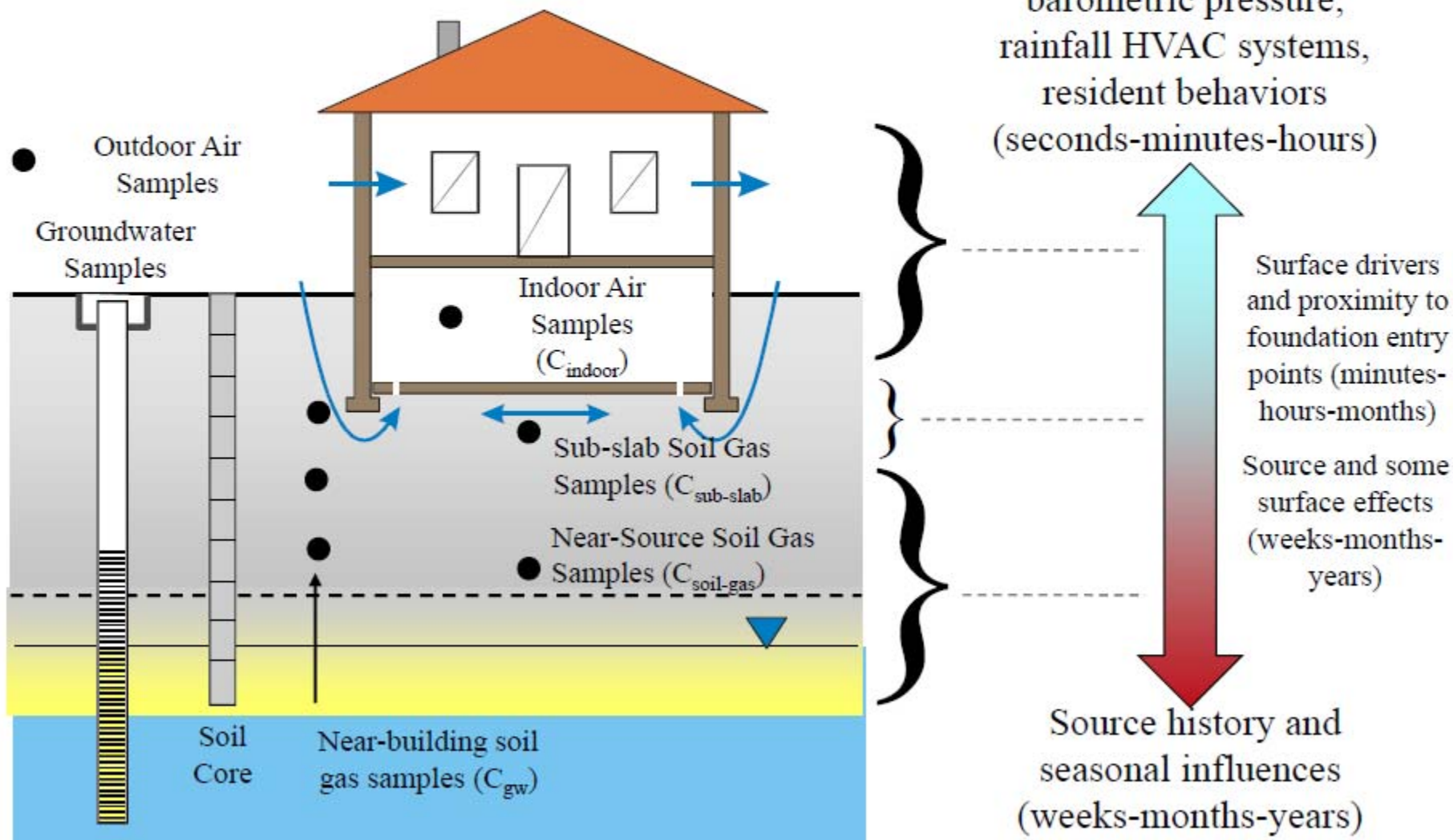


# Investigating the VI Pathway



# Changes with Time?

Buildings and their Surroundings are Dynamic Systems



Wind, temperature,  
barometric pressure,  
rainfall HVAC systems,  
resident behaviors  
(seconds-minutes-hours)

Source history and  
seasonal influences  
(weeks-months-years)

# Purpose for Sampling Various Media during VI Investigation

- Groundwater samples
  - Screens source of vapors (water table ONLY)
  - Identifies possible extent of vapor movement
- Soil vapor samples
  - Screens source of vapor to building
  - Identify pathway of vapor movement
  - Identify possible extent of vapor movement
- Sub-slab vapor samples
  - Identifies possible vapor intrusion risk
  - Screens contaminant source (e.g. @drycleaner)
- Indoor Air samples
  - Identifies current exposure
  - Identifies completed vapor intrusion pathway



# Sampling Concepts for VI Pathway: Groundwater

- Only VOCs located at the water table affect VI
- Use data from water table wells or groundwater grab samples from 6 – 12” of the water table.
- Can use simple equation or Resty's calculator to estimate concentration in groundwater that may cause vapor intrusion.

$$C_{gw} = \left( \frac{C_{IA}}{H \times AF_{gw} \times 1000 \frac{L}{m^3}} \right)$$

# Sampling Concepts for VI Pathway: Groundwater

- Is there a depth to groundwater where vapor migration can be ruled out?
  - *CA uses soil vapor to identify deep groundwater plumes, so soil vapor can extend significant distance above a plume.*
  - *Soil type between contaminated water table and surface is more important VI risk than depth to water table.*

# Sampling Concepts for VI Pathway: Soil Vapor

- Groundwater contamination is the vapor source:
  - *1 – 2 feet above the water table*
  - *At least 5 feet below the building foundation if depth to water allows this*
  - *If depth to groundwater is > 30 feet, half the distance to the water table*
- Soil contamination is the vapor source:
  - *Collect sample in most permeable soil layer (e.g., along a sewer lateral; sand seams in clay soil)*
  - *Collect multi-depth soil vapor samples to identify zones of vapor migration.*



# Sampling Concepts for VI Pathway: Soil Vapor

- Screening individual building for vapor migration:
  - *Preference is sub-slab samples, however soil vapor can be used to screen buildings for VI*
  - *Vapors can travel ~100 feet through soils in all directions from a CVOC source.*
  - *Collect a soil vapor sample as close to the building foundation as possible. Depth of the sample depends on the location of the VOC source. (see previous slide)*
  - *Sample the side of the building closest to the VOC source*





# Spatial & Temporal Variability in Soil Vapor Samples

- Significant spatial variability in soil vapor concentrations
  - *Up to 10 samples needed to estimate true average VOC concentration within +/- 50%*
- Temporal variability is similar to spatial variability\*
- Therefore, a small number of soil vapor concentrations likely represents an order of magnitude accuracy

\*ESTCP Project ER-0423, Dec. 2007, Recommendations for the Investigation of Vapor Intrusion

# Sampling Concepts for VI Pathway: Sub-slab vapor

- Guidance states 3 samples / average home
  - *Most sites are collecting 1- 2 samples/home or average sized building. More than 5,000 ft<sup>2</sup> requires additional samples.*
  - *Vapors can enter through the side-wall of a basement, especially where there is a shallow CVOC source in soils. Depending on foundation construction, vapor samples can be collected through the wall.*
  - *Sub-slab sample data are the primary information used for making mitigation decisions.*



# Sampling Concepts for VI Pathway: Indoor Air

- In general, IA sampling is NOT necessary in industrial plants or commercial buildings, unless a “residential setting” exists (homes, educational, childcare & elder care facilities).
  - *If mitigation is necessary (based on sub-slab samples), effectiveness of the system will be determined through communication tests.)*
- Indoor air SHOULD be collected in homes, apartments, day care centers, clinics, etc. if sub-slab concentrations exceed screening levels in order to evaluate chemical exposure.



# Sampling Concepts for VI Pathway: Indoor Air

- If mitigation is necessary in a residential setting, collect a verification indoor air sample if the original IA testing exceeded screening levels.
  - *With a typical SSDS, communication testing will verify the system's effectiveness.*
  - *Where SSDS can not be used or is ineffective, follow-up IA testing will be necessary.*





# Sampling Concepts for VI Pathway: Indoor Air

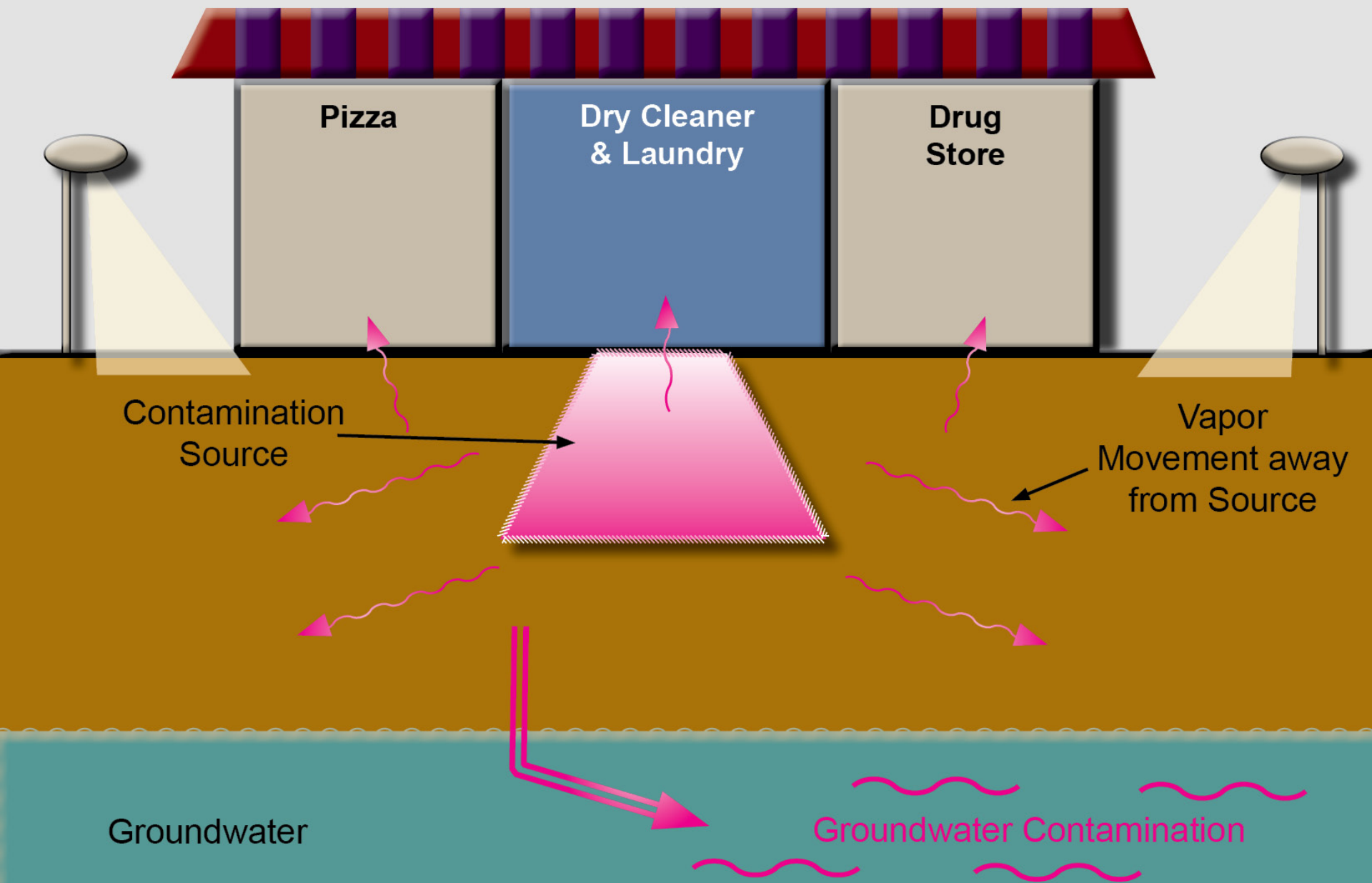
- Length of indoor air sample?
  - *24 hrs for residents*
  - *8 hr for commercial/industrial*
  - *Longer length samples are better – even 14 days*
- Methods
  - *Summa canisters analyzed using TO-15 is preferred*
  - *Tedlar bags acceptable for sub-slab & soil gas if analyzed within 48 hrs*
  - *Methanol impinger is unacceptable (detection levels are too high)*

## **POP QUIZ:**

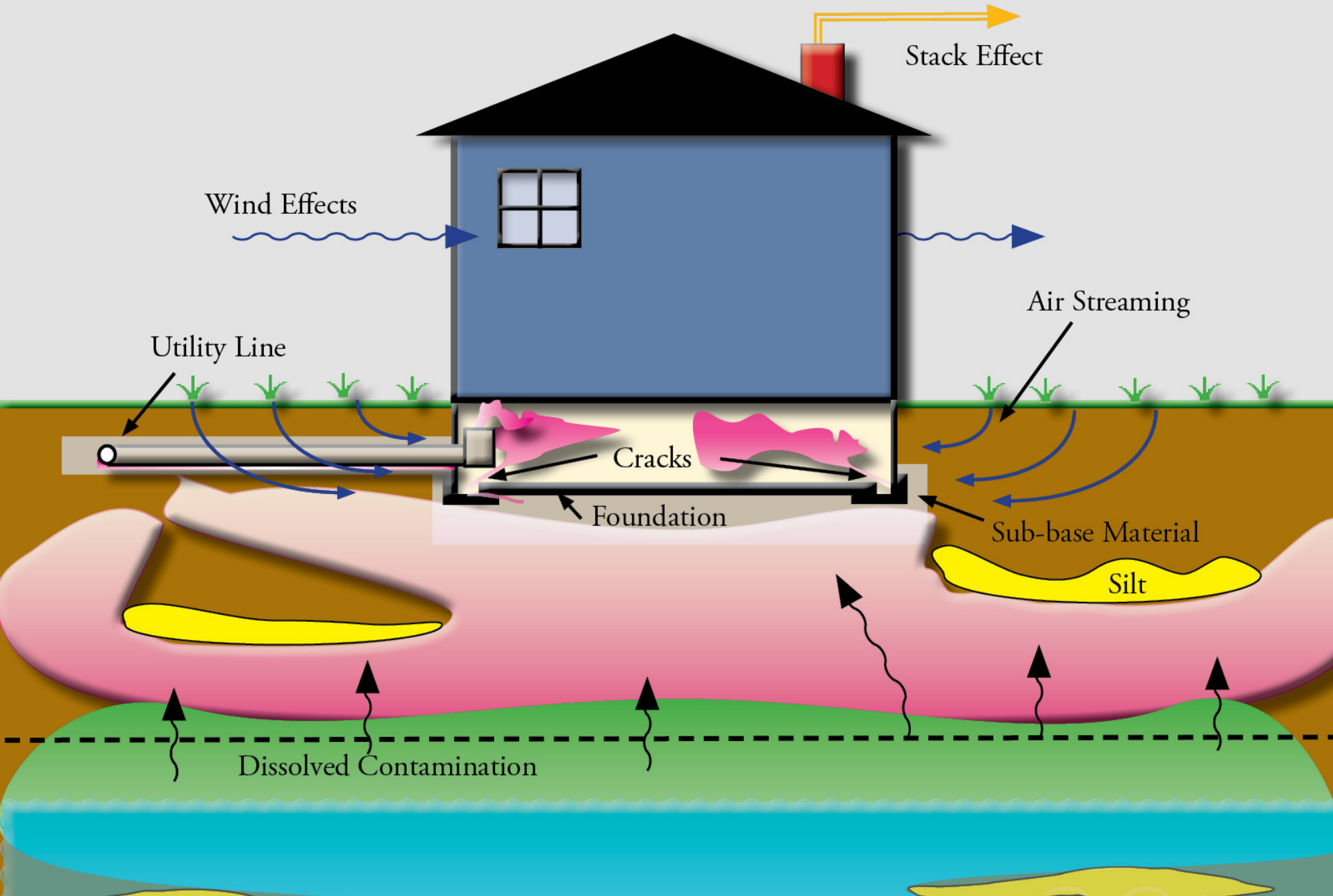
**What & where would you collect samples to assess the VI pathway?**



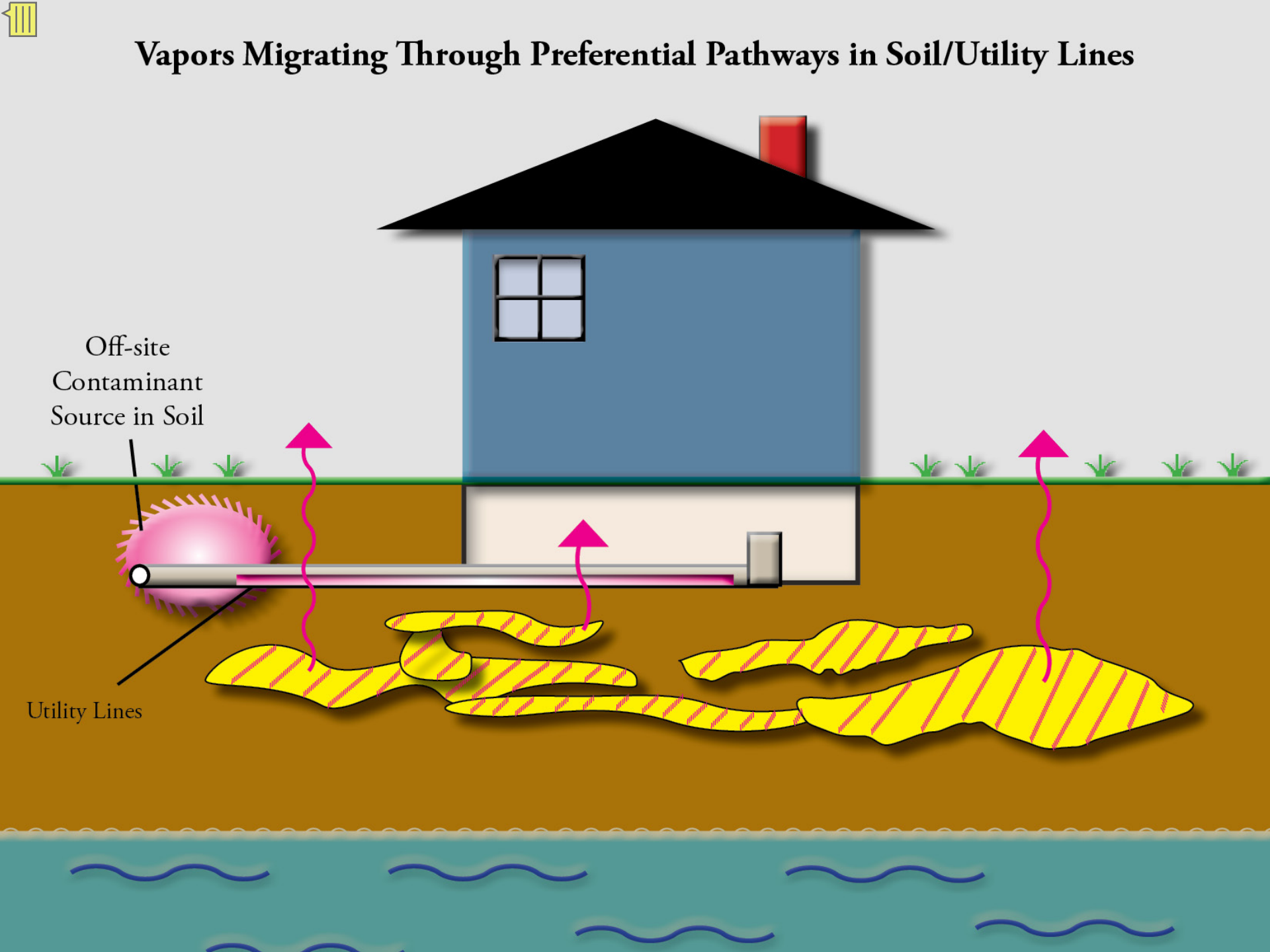
# Vapors from a Release Directly Beneath Building & Vapor Movement Through Soils



# Vapors Migrating from Contaminants Located at the Groundwater Table



# Vapors Migrating Through Preferential Pathways in Soil/Utility Lines

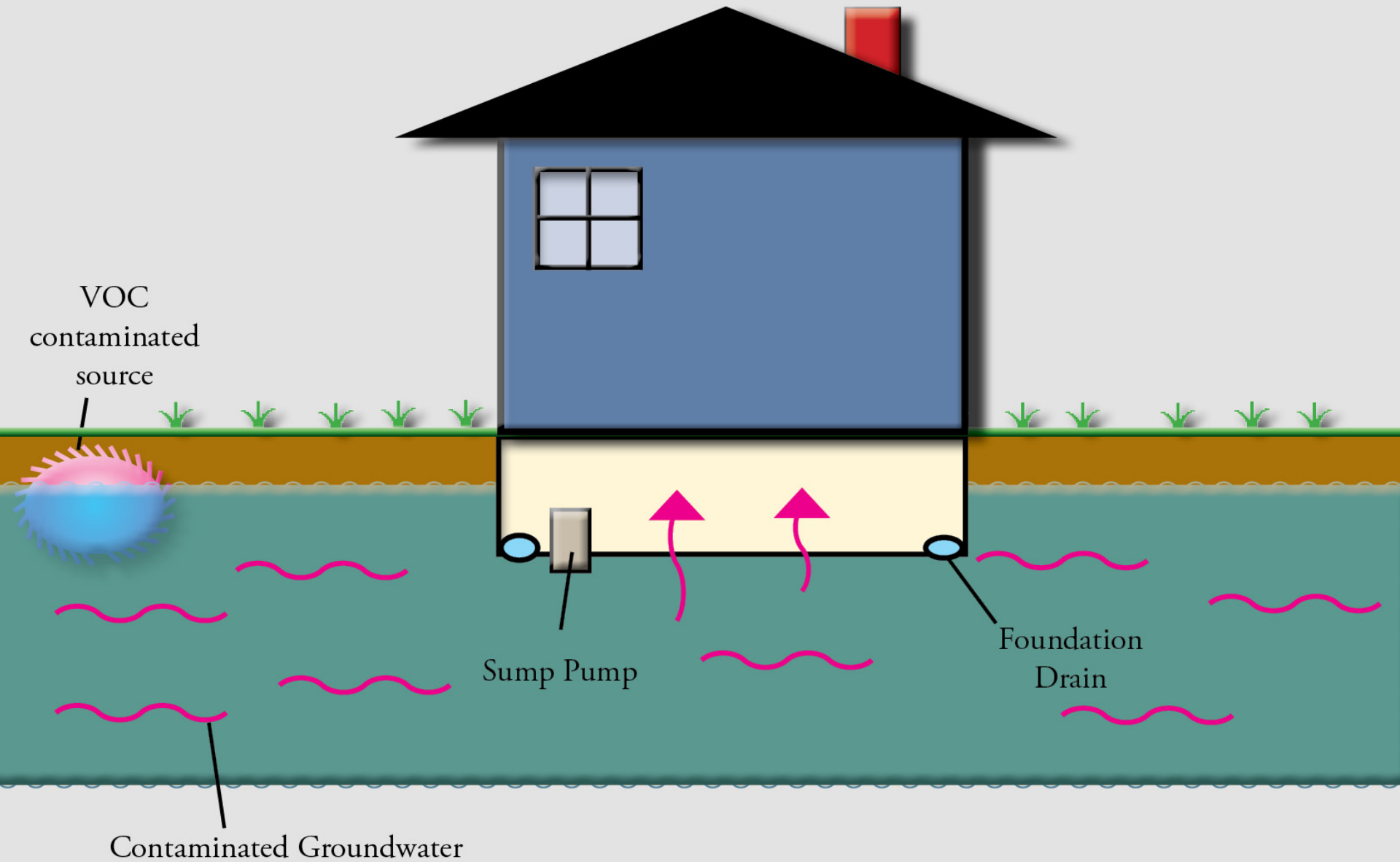


Off-site  
Contaminant  
Source in Soil

Utility Lines



# Contaminated Groundwater Entering a Building



VOC  
contaminated  
source

Sump Pump

Foundation  
Drain

Contaminated Groundwater

# Vapor Sampling Methodology



# How to collect soil vapor/sub-slab samples

- Reference material is available on the Standards & Streamlining Team web page under Technical Resources\*.
  - *Soil Vapor Sampling Video of the Geoprobe Post-run tubing method*
  - *Todd McAlary PowerPoint presentation of several soil vapor collection methods*
- QA/QC is basically the same for soil vapor and sub-slab samples

\*[http://intranet.dnr.state.wi.us/int/aw/rr/gen\\_resources/tech.htm#vapor2](http://intranet.dnr.state.wi.us/int/aw/rr/gen_resources/tech.htm#vapor2)

## QC: Leak detection for soil vapor/sub-slab samples

- All leak detection methods involve placing a volatile chemical at the probe seal and testing for that compound in vapor extracted from the probe.
  - *Expect that leak detection method will be documented to the DNR*
  - *If the leak detection indicates the sample has been compromised (i.e., indoor air has leaked into the sample), a new sample needs to be collected and analyzed.*
    - More than 10% leakage is unacceptable
    - He method detects leaks BEFORE collecting sample

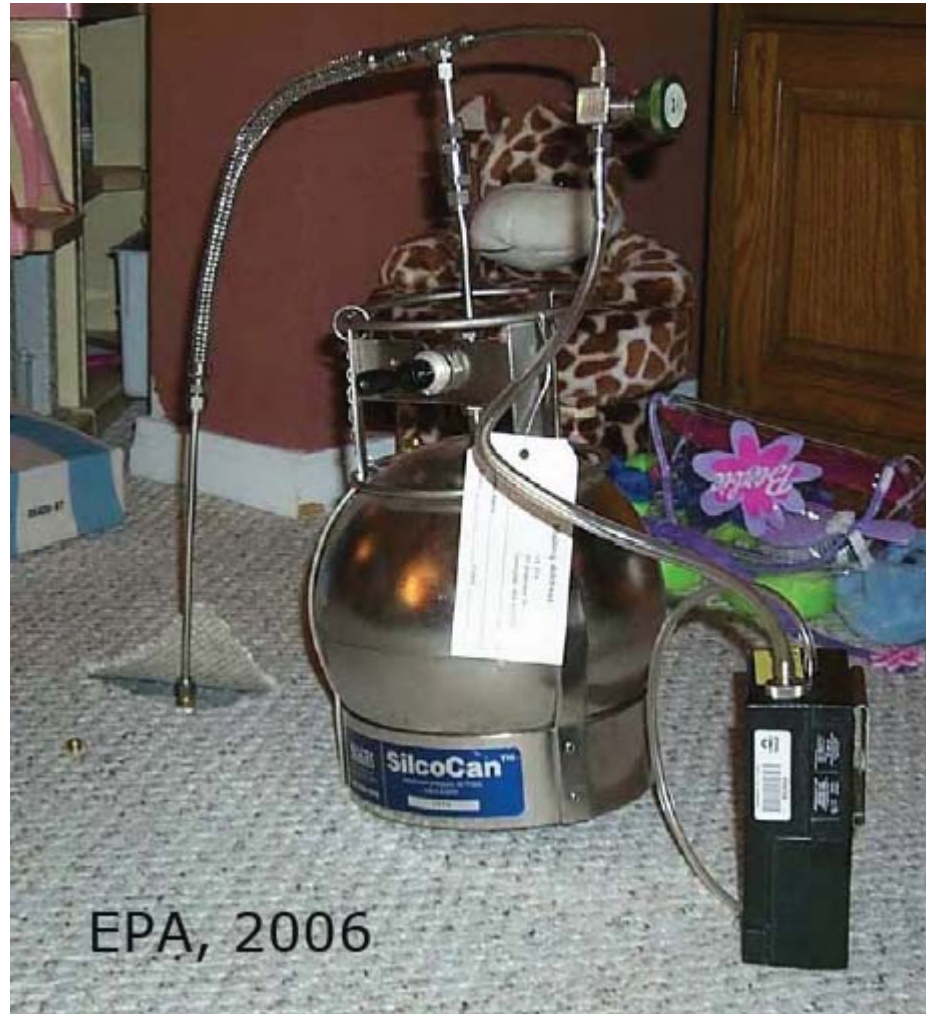
# QC: Shut-in Test

- A shut-in test detects leaks in the above ground fittings in the sampling train.
- Assemble the sampling train, evacuate the lines to a vacuum of 50 – 100 inches water column and observe a vacuum gage for 1 minute. If the vacuum holds, the fittings are tight.





# Shut-in Test: Summa Canister W/ vacuum gage and pump



EPA, 2006

# He shroud with pump/vacuum gage



# Summa canister samples

- Flow regulators
  - *Used for all but grab samples*
  - *Set by the laboratory, therefore you must tell the lab how long you need to sample for*
  - *Rate of flow depends on the sample. Generally do not recommend more than 200 ml/min. (for sub-slab sample, for instance)*
- Do you need to close the Summa canister valve after the 8 or 24 hr sample is collected?
  - *Yes. There should still be a slight vacuum AFTER sample collection. If there is no vacuum, you don't know over what period the sample was collected.*





# Tubing types

- Acceptable tubing type: Stainless steel, Nylaflow, Teflon, tygon, PEEK
- Polyethylene has the poorest performance – both for off-gassing as well as reactivity.\*

\*([http://www.airtoxics.com/literature/papers/Media\\_AWMA\\_Sept\\_06\\_Final.pdf](http://www.airtoxics.com/literature/papers/Media_AWMA_Sept_06_Final.pdf), Impact of sampling media on soil gas measurements, A&WMA conference, 2006)



A decorative vertical strip on the left side of the slide, featuring a green chalkboard texture. It includes two pieces of pink chalk, one standing upright and one lying horizontally. There are also some white chalk-like markings, including a curved line and a vertical line with a horizontal tick at the bottom.

# Off-Source Vapor Intrusion

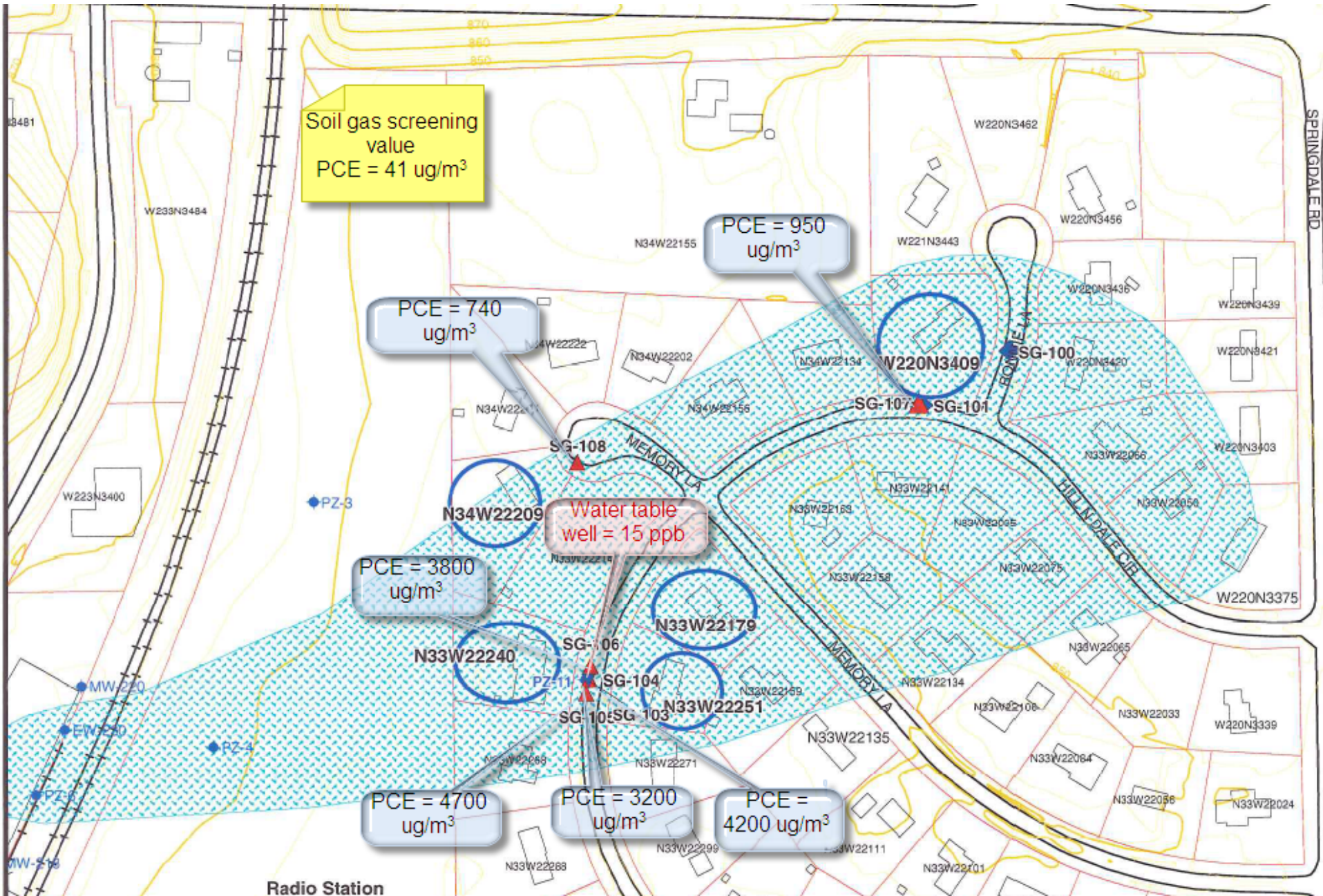



# How far away from the source should the investigation extend?

- *Ex – groundwater plume under 50 homes. Do you test all 50 homes?*
- Use a step-wise approach –
  - *Choose the homes closest to the source (where groundwater concentrations are highest) and test those. If sub-slab testing indicates VI may be a risk, expand the investigation downgradient.*
  - *OUTREACH is critical in these situations. Consider involve local government, hold public meetings, develop a communication plan.*



# Quad-Graphics, PCE soil gas ( $\mu\text{g}/\text{m}^3$ )



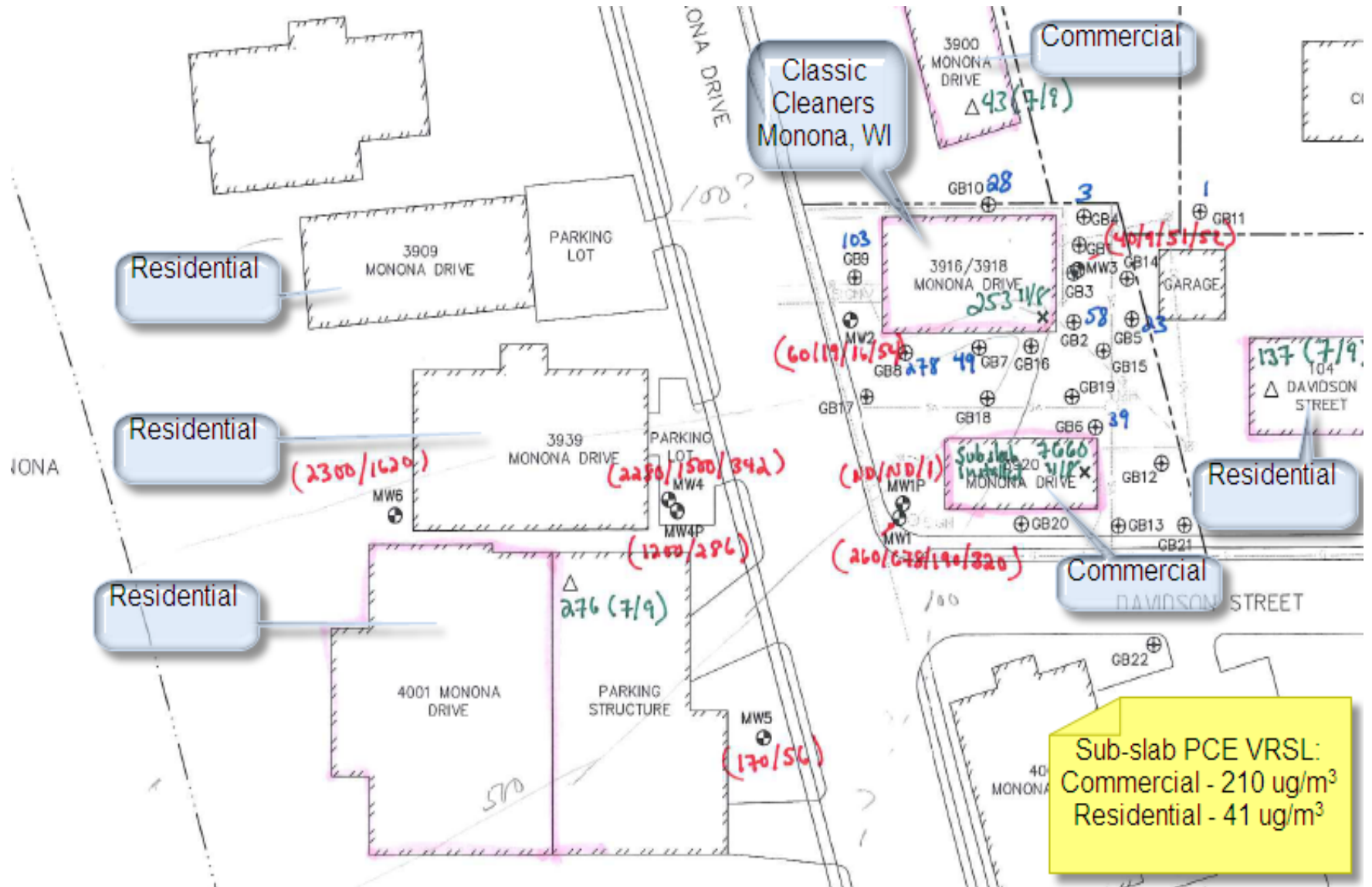


## If vapors are not found at the source building, is off-source investigation needed?

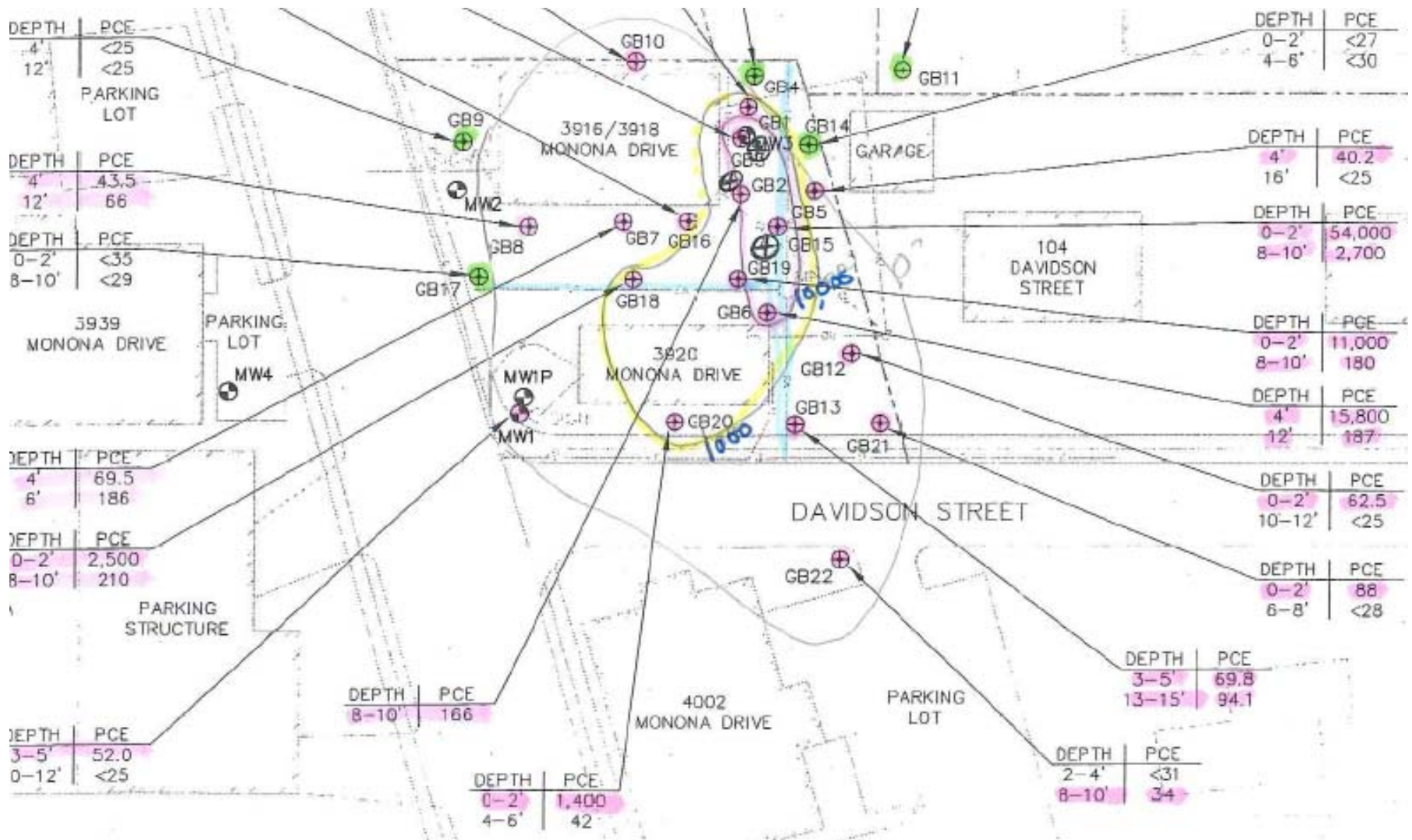
- Site-specific decision. Soil vapor movement is very difficult to predict
  - *Use multiple lines of evidence – extent of soil & groundwater contamination; soil type; preferential pathways, etc.*
- You MUST understand where the release occurred.
  - *Example: Classic Cleaners, Monona, WI*
  - *Example: Gardner Mfg, Horicon, WI*



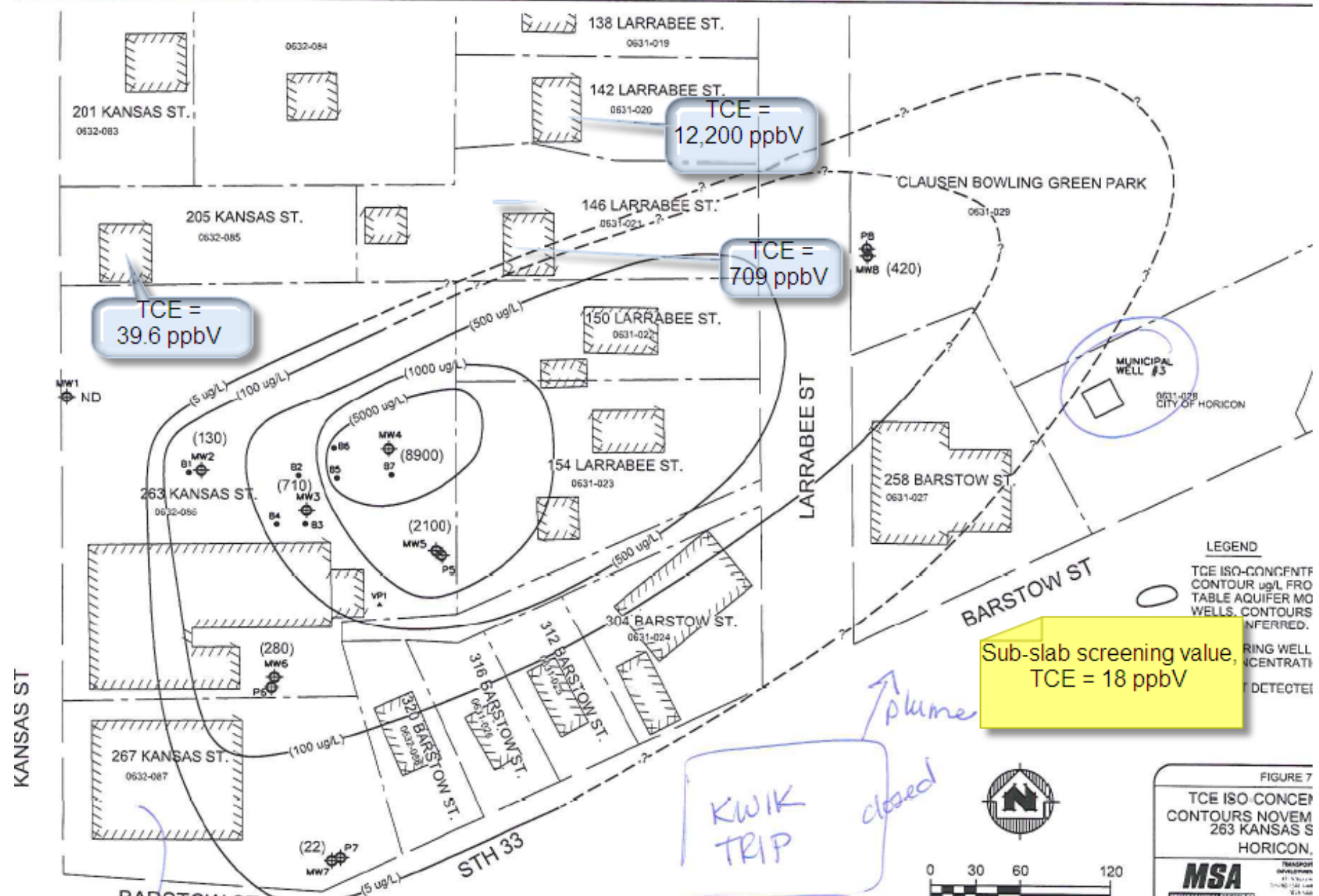
# Classic Cleaners – Monona, WI



# Classic Cleaners – Soil PCE (ug/kg)



# Gardner Mfg – Horicon, WI



TCE = 39.6 ppbV

TCE = 12,200 ppbV

TCE = 709 ppbV

Sub-slab screening value,  
TCE = 18 ppbV

KWIK TRIP closed

plume

**LEGEND**  
 TCE ISO-CONCENTRATION CONTOUR ug/L FROM TABLE AQUIFER MONITORING WELLS. CONTOURS INTERFERED.  
 MONITORING WELL  
 CONCENTRATION DETECTED

FIGURE 7  
 TCE ISO CONCENTRATION CONTOURS NOVEMBER 2003  
 263 KANSAS ST  
 HORICON, WI  
**MSA**  
 TRANSPORT DEVELOPMENT  
 417 N. VANDERBILT  
 SUITE 100  
 MILWAUKEE, WI 53233  
 414.442.4444



# Factors to consider when evaluating off-site VI impacts

- Distance from the contaminant source
- Likelihood that sewers were involved in release
- Extent of water table contamination
- Soil type – clay less transmissive of vapor than sand.
  - *This is applicable where significant clay layer exists between contaminated groundwater & building*
- Aerobic degradability of contaminant
- Thoroughness of site investigation



## VI and Vacant Land

- Recommend that closure letter include a condition requiring vapor resistant construction on any future buildings.
- Basis of this condition will be the presence of VOC residual soil or groundwater contamination remaining on-site at the time of closure. VI investigation is usually NOT done on vacant property.
  - *However, passive vapor sampling can help identify VOC sources.*
  - *Assumes vapor not migrating to off-site buildings.*



# How to Assess VI Data from the Laboratory

# Laboratory Methods & Parameters to report

- Most common vapor method is TO-15; TO-14a is acceptable; on-site GC/MS; others may be acceptable
- Parameter reporting:
  - *Sub-surface samples – usually report all parameters; however the target is the compound(s) released to the environment*
  - *Indoor air – report only the compound(s) associated with the release*

# Sub-slab data – Gardner Mfg (TCE site)

**Table 1**  
**Sub-Slab Vapor Analytical Results Summary**  
**Former Gardner Manufacturing / BT Squared Project #4281**  
 (Results are in ppbv)

Sample	Date	Lab Notes	Acetone	Acrolein	Benzene	Carbon Disulfide	Carbon Tetrachloride	PCE	TCE	m-Xylene & p-Xylene
rslow #1	4/26/2011	--	13.6	<0.085	0.628	0.486	<0.085	<0.085	<0.085	1.41
rslow #2	4/28/2011	(1)	4.64	<u>0.289</u>	0.511	<0.085	0.211	<0.085 *IS	<0.085	1.18
rslow	4/27/2011	--	9.66 *QU	<0.2 *D	0.886	0.59	<0.2 *D	0.660	6.76	3.05
rslow	4/27/2011	--	19.4	<2.5 *D	<2.5 *D	3.74	<2.5 *D	<2.5 *D	9.38	18.4
rslow	4/27/2011	--	56	NA	<20	<20	<20	<20	<20	<40
rabee	4/27/2011	--	<100 *D	NA	<100 *D	<100 *D	<100 *D	<100 *D	<u>709</u>	<200 *D
rabee	4/28/2011	(2)	3.95	<u>0.180</u>	0.331	0.527	<0.085	<0.085	1.40	0.693
rabee	4/28/2011	(3)	2.51	<0.085	1.62	0.649	<0.085	0.314 *IS	0.434	2.17
Indoor Air Concentration (risk – 10 <sup>-5</sup> )(ug/m <sup>3</sup> )					3.1		4.1	4.1	12	
Indoor Air Concentration (HI-1)(ug/m <sup>3</sup> )			32,000	0.021	31	730	100	280		730
Indoor Air Conc. (risk – 10 <sup>-5</sup> , HI-1) ppbv			13,471	0.00916	0.97	234	0.65	0.6	2.2	168
Sub-Slab Vapor Concentration (0.1 AF)			134,710	0.092	9.7	2,340	6.5	6	22	1,680



# Indoor Air – Gardner Mfg (146 Larabee)

<u>146 Larabee</u>	<u>TCE (ppbV)</u>	<u>Attenuation</u>
Sub-slab	709	
Basement	0.49	0.0007
1st Floor	0.303	
2nd Floor	ND	
Outdoors	ND	

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# What does exceedance of RSL table numbers mean?

- Screening values are used to:
  - *Determine when potentially significant contamination requires a SI*
  - *Develop remediation goals that are modified according to site-specific conditions*
- To modify, must address fundamental risk questions, such as exposure and land use assumptions.
  - *Investigators may modify the screening values for site-specific application, but they need to set out the basis for doing so, just as with soil contaminant values.*

# Addressing Exceedance of RSL Table Value

- Options to address contaminants in the environment include:
  - *Cleanup of contaminant*
  - *Create a barrier (can be institutional and/or physical) to protect the public from residual contaminant*
- Vapor pathway options
  - *Cleanup source of contaminant*
  - *Physical barrier usually a radon mitigation system*
    - Can include barrier between source & receptor



# When to involve DHS staff

- Contact DHS when:
  - *Indoor air concentrations exceed risk screening values (10-5 cancer risk or HI = 1)*
  - *Risk communication help is needed (e.g., consultant is reluctant to collect sub-slab samples in private homes)*
- Contact DNR staff for:
  - *Investigation approaches & techniques*
  - *Data evaluation & decisions on next steps*
  - *Funding requests if RPs can't/won't undertake action*



# Involving Local Health Departments

- DHS staff in Madison involve local health departments when necessary
  - *DNR staff should work through DHS if it is necessary to involve a local health department*
- Local health departments (not DNR) make decisions regarding habitability.
  - *Local health departments can order buildings vacated or restrict certain uses*
  - *Local health staff rely on State DHS staff opinions*

# Mitigating the VI Pathway





# When to Mitigate the VI Pathway?

- When VI presents a risk to receptors.
  - *If indoor air in a residential setting  $>10^{-5}$  risk due to VI, mitigation is always required.*
  - *Sub-slab vapor concentrations used to make a decision on whether a risk to receptors exists.*
  - *Usually installed as an interim measure while remedy proceeds.*
  - *Guidance allows on-going monitoring of indoor air*
- If possible, remediate first to avoid mitigating.
  - *If only commercial properties involved or indoor air  $<10^{-5}$  in residential setting, may be able to delay mitigation until remedy complete & then assess need for mitigation.*



# Other Vapor Mitigation Options

- High water table
  - *Even a small amount of air space (1/2") between the water table & foundation will allow installation of SSDS.*
  - *Sealing and venting sump basin; sealing any cracks in foundation*
  - *Vent basement air*
- Building pressurization (commercial facilities)



# Sub-Slab Depressurization Systems

- **Standards:** (1<sup>st</sup> 2 on DNR intranet)
  - *ASTM Standard Practice for Installing Mitigation Systems in Existing Low-Rise Residential Buildings (E2121-09)*
  - *AARST\* Active Soil Depressurization Radon Mitigation Standards for Low-Rise Residential Buildings (2006, draft)*
  - *EPA's Radon Mitigation Standards (1994) has been superseded by the ASTM Standard E2121.*

*\* American Association of Radon Scientists and Technologists*



# Sub-Slab Depressurization Systems

- Design & proper installation are the responsibility of radon contractors
- “Radon Mitigation System Inspection Checklist” on DNR intranet.
  - *Use this if you inspect a sub-slab depressurization system or need information on basic construction & operation criteria.*
  - [http://intranet.dnr.state.wi.us/int/aw/rr/gen\\_resources/radon\\_Mtg\\_checklist.pdf](http://intranet.dnr.state.wi.us/int/aw/rr/gen_resources/radon_Mtg_checklist.pdf)

# Communication Testing

Drill small hole(s) in slab and insert a micromanometer. Pressure difference between indoor and sub-slab pressure should be 6 – 9 Pa or 0.025 to 0.035 inches water column. (ASTM standard)



# Verification testing of SSDS

- Communication tests:
  - *If sub-slab soils are permeable, communication tests can be run after system installation*
  - *Wet or tight sub-slab soils – may need to wait a number of weeks to months to test communication*
- Indoor air testing (where needed)
  - *Wait 3 months after system installation*
  - *1 test adequate if system operating effectively*





# What if SSDS “doesn’t work”

- 1<sup>st</sup> - Communication test to establish that a pressure differential exists beneath slab
  - *Additional SSDS may be necessary*
- 2<sup>nd</sup> - ID other possible sources of vapor
  - *Sidewall of basement?*
  - *Entraining vapors from adjacent facility or outdoor air?*
  - *Indoor sources?*



# Operational Responsibilities of SSDS

- The property owner is responsible for operating the SSDS after installation.
  - *WI State Stats, chap 292.11 and 292.12*
  - *The property owner can enter into a legally enforceable agreement with the RP for maintenance of the SSDS*
- If DNR installs an SSDS, the property owner is expected to continue operations.
- Systems are considered permanent part of building. We do not anticipate shutting SSDS off.

# Operational Responsibilities of SSDS

- Closure letter template refers to “property owner” for maintenance of cap, VMS. However statute allows closure conditions to be placed on building “occupants”.

*292.12(5), Stats. - Compliance with requirements and limitations.*

*(a) - property owner (maintenance of an engineering control, si/ra if structural impediment removed, unless contract with another person (RP))*

*(b) - property owner or occupant (limitations or conditions imposed in accordance with rules)*

# Vapor Intrusion & Closure







# Closure issues

- Is there a fee if there are no soil or groundwater issues & vapor is the only continuing obligation?
  - *No.*
- Can sites be listed on the GIS registry for vapor alone?
  - *Yes – but the DNR must put the GIS packet together and no fee can be charged.*
  - *If a VMS is in place, the site will go on the GIS for a continuing obligation, but no fee will be charged or a GIS package submitted. (i.e., DNR will prepare the GIS package.)*
  - *Processing GIS package: must ID either soil or groundwater contamination. Ask GIS Team member which route to include.*

# Closure issues

- Can industrial zoning be required where vapors are above residential standards on an industrial property?
  - *Yes. Authority: s. NR 726.05(8) (a) 3. allows site-specific conditions at closure.*



# Closure issues

- How is a continuing obligation for an off-site property owner (OSPO) documented in the closure letter, BRRTS & the GIS?
  - *Closure letter must specify the name & address where the system is located and that the property owner is responsible for O&M.*
  - *Property owner receives a specific letter (currently no template for this) as well as a copy of the closure letter*
  - *OSPO only shows up on GIS (not BRRTS) with a red dot & address only available on GIS*
  - *Address information is collected on Form 4400-246, Off-Source Property Owner (GIS pkg)*

# Closure issues

- Examples of sites closed with VI continuing obligations
  - *Do a BRRTS search for code 11 (closure) and 226 (VI conditions)*
  - *Silver Spring Terrace (closed DC with VMS):*  
<\\central\efiles\SER\Milwaukee\02ERP\0241191377\0241191377.pdf>
  - *Jomblee (active DC with VMS):*  
<\\central\efiles\SER\Milwaukee\02ERP\0241543523\0241543523.pdf>
  - *Pioneer Mini-mart (off-site VMS recommended):*  
<\\central\efiles\NER\Fond du Lac\02ERP\0220550928\0220550928.pdf>



# Miscellaneous



# What vapor concentration indicates the possible presence of NAPL?

- Saturated vapor concentration is the maximum amount of contaminant that can exist in vapor.
- Pure product is indicated by a few % of saturated vapor concentration

Compound	Saturated Vapor Conc. ( $\mu\text{g}/\text{m}^3$ )	Indicator of NAPL (5%) ( $\mu\text{g}/\text{m}^3$ )
PCE	$1.3 \times 10^8 \mu\text{g}/\text{m}^3$ (19,000 ppmV)	6,500,000 $\mu\text{g}/\text{m}^3$ (2,000,000 ppbV)
TCE	$4.2 \times 10^8 \mu\text{g}/\text{m}^3$ (77,000 ppmV)	21,000,000 $\mu\text{g}/\text{m}^3$ (3,850,000 ppbV)

# Vapors from water supply system vs. vapor intrusion

- Risk from dermal/inhalation = oral risk from water supply
  - *At  $10^{-4}$  risk in water supply, DHS issues a flush only advisory due to risk from vapor exposure*
- Risk from vapor intrusion pathway evaluated using very similar equations, slope factors, etc. as used to evaluate risk from drinking & groundwater. (See link below)

[http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/equations.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/equations.htm)

# Helpful References

- DNR intranet:  
[http://intranet.dnr.state.wi.us/int/aw/rr/gen\\_resources/tech.htm#vapor2](http://intranet.dnr.state.wi.us/int/aw/rr/gen_resources/tech.htm#vapor2)
- Clu-In Vapor Page: [http://clu-in.org/issues/default.focus/sec/Vapor\\_Intrusion/cat/Overview/](http://clu-in.org/issues/default.focus/sec/Vapor_Intrusion/cat/Overview/)