

Idaho Risk Evaluation Manual for Petroleum Releases

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IDAHO RISK EVALUATION MANUAL FOR PETROLEUM RELEASES

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ACRONYMS AND ABBREVIATIONS

AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
BTEX	Benzene, Toluene, Ethyl Benzene, and Xylene
CAL-EPA	California Environmental Protection Agency
CAP	Corrective Action Plan
CAS	Chemical Abstract Service
cc	Cubic Centimeter
CLP	Contract Laboratory Program
COI	Petroleum Chemical of Interest
C_{cw}	Concentration in Ground Water (Between Source and Surface Water) at Alternate Point of Compliance
cm^2	Square Centimeter
C_{soil}	Source Area Concentration in Soil
C_{swpoe}	Point of Exposure Concentration in Surface Water
DAF	Dilution Attenuation Factor
DEQ	State of Idaho, Department of Environmental Quality
DOE	U.S. Department of Energy
DQO	Data Quality Objective
Eh	Redox Potential
EPA	U.S. Environmental Protection Agency
EU	Exposure Unit

ft	foot
gm	gram
GW	Ground Water
GWP	Ground Water Protection
HI	Hazard Index
HQ	Hazard Quotient
IDWR	Idaho Department of Water Resources
IELCR	Individual Excess Lifetime Cancer Risk
IRIS	Integrated Risk Information System
ISCE	Initial Site Characterization and Evaluation
IUPAC	International Union of Pure and Applied Chemists
IUR	Inhalation Unit Risk
kg	kilogram
L	liter
LNAPL	Light Non-Aqueous Phase Liquid
MCL	Maximum Contaminant Level
mg	milligram
MTBE	Methyl Tertiary Butyl Ether
NA	Natural Attenuation
NAPL	Non-Aqueous Phase Liquid
NCEA	National Center for Environmental Assessment
NFA	No Further Action
NPDES	National Pollutant Discharge Elimination System

PAH	Polycyclic Aromatic Hydrocarbons
POC	Point of Compliance
POE	Point of Exposure
PSC	Petition for Site Closure
PST	Petroleum Storage Tank
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
RA	Relative Absorption
RATL	Remedial Action Target Level
RBCA	Risk-Based Corrective Action
REM	Risk Evaluation Manual
RE	Risk Evaluation
RF	Reduction Factor
RfD	Reference Dose
RfC	Reference Concentration
RMP	Risk Management Plan
RNA	Remediation by Natural Attenuation
ROE	Route of Exposure
RSL	USEPA Regional Screening Level
SAB	EPA's Science Advisory Board
SCM	Site Conceptual Model
SF	Slope Factor

SVOC	Semi-Volatile Organic Chemical
STATECOM	State Communications Center
SW	Surface Water
TEQ	Total Toxic Equivalency
TEF	Toxic Equivalency Factors
UCL	Upper Confidence Limit
UECA	Uniform Environmental Covenants Act
USACE	United States Army Corps of Engineers
VOC	Volatile Organic Compound

INTRODUCTION

In April 2009 the Idaho Legislature approved the establishment of the Department of Environmental Quality (DEQ) Rules IDAPA 58.01.24, Standards and Procedures for Application of Risk Based Corrective Action at Petroleum Release Sites. This rule required that DEQ prepare a risk evaluation manual for petroleum releases which would be used as guidance for implementation of the rule. This document represents that implementation guidance. The rule may be obtained at: <http://adm.idaho.gov/adminrules/rules/idapa58/0124.pdf>

ORGANIZATION OF THIS DOCUMENT

The document begins with a general description of the risk evaluation process. This is then followed by detailed implementation information for the various steps. Software has also been developed that complements the process described.

SECTION 1 OVERVIEW OF THE RISK EVALUATION PROCESS

1.1 STEPS IN THE RISK EVALUATION PROCESS

The overall evaluation process for a site where a petroleum release is discovered and reported to DEQ is illustrated in Figure 1. The process consists of multiple steps, each of which is briefly described. In some cases, when adequate data are available concerning a release, the owner or operator (as defined IDAPA 58.01.24.010.) of the release site may proceed directly to the more detailed level of evaluation, site-specific risk evaluation, without formally completing the intermediate steps. DEQ should be notified in these instances. A comparison of the two risk evaluation options is presented in Table 1.

1.1.1 Site Discovery

The risk-based site management process begins with the discovery of a petroleum release site. A petroleum release site may be discovered and reported to DEQ under a variety of circumstances. These include, but are not limited to, citizen complaints, investigations conducted as a part of real estate transactions, environmental impacts observed in surface water bodies, and notification of accidents and spills. It is the owner/operator's responsibility to ensure that the DEQ is notified.

Figure 1. Idaho Petroleum Release Risk Evaluation Process Flowchart. This process allows moving directly to performing a detailed risk evaluation without prior completion of a screening level evaluation.

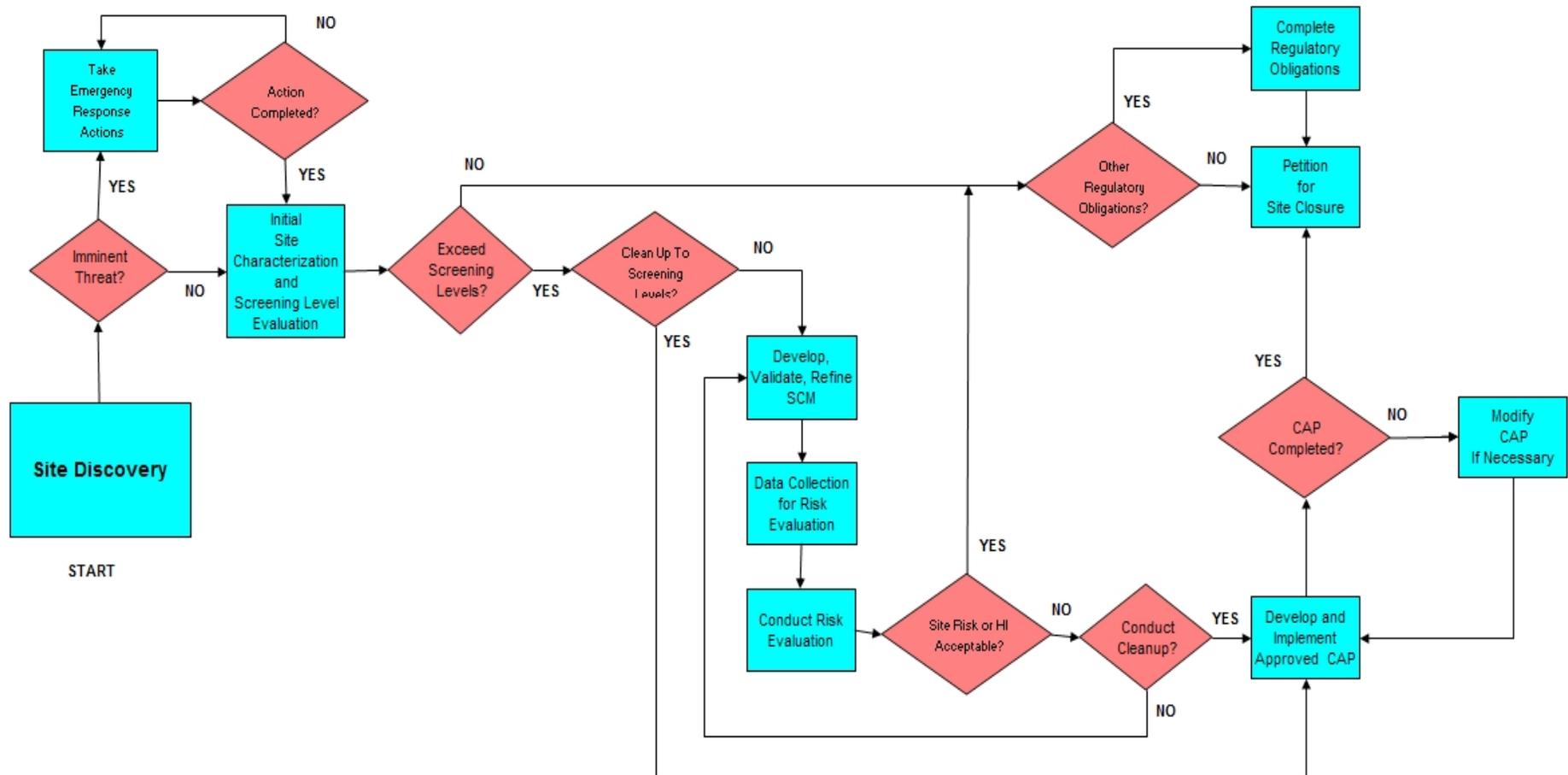


Table 1. Comparison Of Risk Evaluation Options

FACTORS	Screening Level Evaluation	Site Specific Risk Evaluation
Exposure Factors	Default	Site-specific/default
Toxicity Factors	Rule specified values	Rule specified values
Physical and Chemical Properties	Default	Default or DEQ accepted values
Fate and Transport Parameters	Default	Default/Site-specific
Unsaturated Zone Attenuation	None	None/Site-specific
Fate and Transport Models	Default	Default or other models acceptable to DEQ
Exposure Point Concentrations	Maximum	Conservative Estimate of Mean/ statistical evaluation.
Acceptable Target Risk	1 x 10 ⁻⁶	Cumulative effects considered Target of 1 x 10 ⁻⁵
Acceptable Target Hazard Quotient (HQ)/Hazard Index (HI)	HQ = 1	Cumulative effects considered HI Target of 1
Ground Water Protection	Maximum Contaminant Level (MCL) or risk based target levels	MCL or risk based target levels
Outcome of Evaluation	Petition for Site Closure, Risk Evaluation (RE), Corrective Action Plan (CAP)	Petition for Site Closure, Refine RE, CAP
Soil Concentration Protective of Ground Water	Default model with Point of Exposure (POE) at source	Default model with POE determined as per Section 4. Flexibility in model used subject to DEQ approval
Surface Water Classification	See Section 4	See Section 4
Point of Exposure	Source	See Section 4
Activity and Use Limitations	None	See Section 6

1.1.2 Determination of Imminent Threat

Upon site discovery, the owner/operator should carefully evaluate the available information to determine whether the site poses any imminent threat to human health or safety, or to the environment. Threats include, but are not limited to, impacts to water wells; vapors or odors in residential and commercial structures; concentrations approaching explosive levels; impacts to a surface waterbody; and impacts to human health and the environment. If any imminent threats are identified, the owner/operator should notify DEQ or STATECOM immediately and take immediate steps to abate the threat. Documentation of abatement activities and confirmation that imminent threats have been removed should be provided to DEQ. Further details of this step are provided in Section 2.

1.1.3 Initial Site Characterization and Evaluation

Upon completion of the emergency response action, if any, it is necessary to perform an Initial Site Characterization and Evaluation (ISCE). As a part of the ISCE, media-specific (soil and ground water) data should be collected to characterize the source. This step is intended to identify the maximum contaminant concentrations for the identified petroleum products in soil and ground water. Since a site may be a candidate for closure after the completion of the screening level evaluation (see Section 3), it is very important that the data collected in at this time identify the maximum media-specific concentrations. Further details of this step are provided in Section 2.

1.1.4 Comparison with Screening Levels

This step involves the comparison of maximum, media-specific contaminant concentrations, identified in the ISCE, with the Screening Levels developed by DEQ and presented in Table 2. Screening levels are the lowest of the media-specific (soil, soil gas and ground water) risk-based concentrations of the applicable exposure pathways. Meeting these criteria allows unrestricted (residential) use of the property. Since exposure to these low concentrations of contaminants does not pose a threat to human health, their application does not require the evaluation of site-specific exposure pathways, the development of a site conceptual model, or any land use restrictions.

This step involves the comparison of maximum, media-specific contaminant concentrations, identified in the ISCE, with the Screening Levels developed by DEQ and presented in Table 2. When the department and the owner/operator agree a petroleum release has been adequately characterized, the department will not require any further action of the owner/operator related to the release when the maximum soil, surface water and ground water do not exceed the screening levels, subject to applicable requirements within the Water Quality Standards, IDAPA 58.01.02.851 and 852 and the Groundwater Quality rules, IDAPA 58.01.11.400.05. If the maximum soil or ground water concentrations exceed the Screening Levels, the responsible party may either adopt the Screening Levels as cleanup criteria and develop a corrective action plan (CAP) to achieve these levels or perform a site specific Risk Evaluation (RE). Further details of this step are provided in Sections 3 and 4.

1.1.5 Development and Validation of a Site Conceptual Model

If the Screening Levels are exceeded and the choice to conduct a more detailed risk evaluation is selected, it is first necessary to develop and validate a site conceptual model (SCM). A SCM provides the framework for the overall management of the site and should help guide data collection and risk management activities when a Risk Evaluation-1 is performed. The key elements of the SCM are the release scenario(s), source description, petroleum chemicals of interest (COI); an exposure model that incorporates the appropriate receptors, pathways, and routes of exposure (ROE); the site stratigraphy and hydrogeology; and the spatial and temporal distribution of the COI. An important part of this step is the validation of the SCM based on the collection of site-specific data. Further details of this step are provided in Section 4.1.

1.1.6 Identify and Collect Data for Risk Evaluation

Depending on the site-specific conditions, the RE may require the collection of additional site-specific data. In preparation for a RE, the SCM developed should be reviewed, data requirements to fill gaps identified, and additional data collected, if necessary. This data will be used to calculate an estimate of site-specific exposure point concentrations, site-specific cumulative risk and, potentially, to develop remedial action target level concentrations (RATL) using the guidance provided in this document. Further details of this step are provided in Section 4.2.

1.1.7 Site Specific Risk Evaluation

The RE requires the development of site-specific estimates of exposure point concentrations for soil and ground water, estimation of site-specific cumulative risk, comparison with acceptable target risk levels and, if necessary, the development of media-specific remedial action target level concentrations. Remedial action target levels are target concentrations developed by the owner/operator using a combination of conservative default and site-specific parameters. These concentrations depend on the receptor, media, pathway, and the ROE and are developed for each COI and each media identified in the SCM. This step is discussed in Section 4.6 and Appendix A-6. Use of RATL concentrations may require activity and use limitations.

1.1.8 Comparison with Acceptable Target Risk Levels and Decision Making

The estimated site-specific cumulative risk is compared to acceptable target risk levels. If acceptable target risk levels are not exceeded, the site is eligible for closure, subject to applicable requirements within the Water Quality Standards, IDAPA 58.01.02.851 and 852. If the site-specific cumulative risk exceeds the acceptable target risk levels, two options are available:

- Calculate and adopt media-specific RATL concentrations for each COI and develop and implement a CAP to achieve these concentrations.
- Refine the SCM and RE. This may involve the collection of additional data or the use of other models. Prior to collection of these data, an optional work plan may be developed outlining additional data needs and the overall approach for the refined evaluation. The plan may be submitted to DEQ for review and approval prior to proceeding with data collection and the evaluation. Details of this step including the basic contents of a work plan are included in Section 4.7.

Upon completion of the RE, the owner/operator should provide recommendations to DEQ. In most cases it is anticipated that DEQ and the owner/operator will work together to identify the best alternative. Note that it is not necessary to complete a Screening Level evaluation prior to preparing a RE although it is recommended to inform DEQ of these decisions.

1.1.9: Development and Implementation of a Corrective Action Plan

The CAP may include a combination of active and passive remedial options and activity and land use limitations assumed in the risk evaluation step. Details of this step are included in Section 5. This step requires the development and implementation of a CAP to achieve the cleanup criteria. In the risk evaluation process, the responsible party has to select the Screening Levels or RATLs as the cleanup concentrations and prepare a CAP to achieve the selected concentrations in each media.

1.1.10 Evaluation of Progress Towards Remedial Goals and Modification of the Corrective Action Plan

The data collected during implementation of the CAP must be evaluated by the owner/operator and submitted to DEQ to make a determination whether the CAP is progressing as anticipated. Modifications to the CAP may be necessary in some circumstances. These include when significant deviations from the remedial strategy, or unacceptable risk levels to receptors, are identified by either DEQ or the owner/operator, or if the data indicate that site cleanup is not progressing at the rate anticipated. In these cases appropriate modifications to the CAP should be considered with subsequent approval of an amended CAP by DEQ. The specific modifications to the CAP will vary from site to site.

1.1.11 Site Closure with a CAP

The primary objective of the CAP at any site is to ensure the long-term protection of human health and the environment taking into consideration current and reasonable future conditions. When the regulatory obligations specified in the DEQ approved CAP have been achieved, the site is eligible for closure. Closure typically involves a request by the owner/operator that no other work is needed related to the release.

1.1.12 Professional Training Certification

If work is performed that the State of Idaho requires a professional geologist or professional engineer, the owner/operator shall employ the use of, and obtain certification from, a professional geologist or professional engineer registered in Idaho for that work.

SECTION 2

SITE DISCOVERY AND INITIAL STEPS

2.1 DETERMINING IMMINENT THREATS

The first step upon identification of an impacted site or knowledge of a release is to determine whether contamination poses any immediate risk to human health or the environment. Examples of abatement measures include taking action to prevent further release into the environment, provision of alternate water supply if drinking water wells are impacted, evacuation of residents/commercial workers if exposed to vapors at high concentrations, installation of booms on surface waterbodies with a sheen, or ventilation of utilities with vapors. If there is an imminent threat, or uncertainty regarding potential threats associated with a release, call DEQ or the State Communications Center (STATECOM) at 1-800-632-8000 or (208) 846-7610. Releases which do not pose an imminent threat do not need to be reported to STATECOM, but do need to be reported to DEQ. Owner and Operators shall follow the Petroleum Release Reporting, Release Response and Initial Abatement Measures as provided in IDAPA 58.01.02.851 and 852.

2.2 INITIAL SITE CHARACTERIZATION

2.2.1 Introduction

Within the risk evaluation process, initial site characterization is performed upon completion of any necessary emergency response actions. The overall objective of the initial site characterization is, at a minimum, to identify the maximum chemical concentrations on site in each of the affected media. These maximum concentrations are then compared with Screening Levels to determine the need for any further action.

A brief description of the initial site characterization process is presented below.

2.2.2 Site Description and Adjacent Land Use

The owner/operator should conduct a thorough site reconnaissance and a historical review of site operations to identify source(s) of contamination on site. Sources may be identified based on knowledge of a known or documented release; location of certain structures that typically represent a source such as underground storage tanks, pipes, pumps, etc.; interviews with current and former site employees who may have knowledge of source areas.

In addition to identifying sources, the owner/operator should collect data related to historic, current, and future land use on and adjacent to the site. A chronology of relevant site activities is often useful in understanding the site.

Based on this information, the owner/operator should identify the type of petroleum that may have been released at the site. Data collected during initial site characterization should at a minimum satisfy the following requirements:

United States Environmental Protection Agency (EPA) recommended Quality Assurance/Quality Control (QA/QC) requirements have been met,

Analyte detection limits, where feasible, do not exceed Screening Levels,

Appropriate petroleum COI have been identified and included for analysis,

Source areas have been adequately characterized to identify the maximum concentration, and

Analytical methods used are appropriate for petroleum COI at the site.

2.2.3 Soil Source Characterization

The owner/operator should collect soil data representative of the release's maximum concentration of . The exact number of samples, analytical methods used, and specific technology applied to collect data will vary among sites. It is recommended, but not required that the owner/operator develop a work plan and have it reviewed and approved by DEQ prior to implementing the work. At a minimum, the owner/operator should verbally confer with DEQ before collecting any data .

The overall intent of initial site characterization is to identify maximum concentrations of petroleum COI. However, for sites that will likely require further characterization, it may be efficient and cost-effective to collect additional data at this stage of the evaluation to identify the nature and extent of contamination and potential for exposure. For example, if contamination is suspected to exist in both surficial and subsurface soil zones, samples representing maximum concentrations in both zones should be collected.

2.2.4 Ground Water Source Characterization

In the initial site characterization,if there is evidence of possible ground water impact from the site release, the owner/operator should collect ground water samples below or immediately adjacent to the source. For sites with a very localized source, it may be sufficient to collect only one ground water sample using a temporary well. Sites with multiple sources may require multiple wells and samples. For sites that will require further characterization, it may be more efficient and cost-effective to install at least three monitoring wells so the magnitude and direction of flow can also be established.

2.2.5 Documentation of Initial Site Characterization

The owner/operator should document the results of the characterization in a brief report. The chemical data collected should initially be evaluated using the Screening Levels, as discussed in Section 3. The responsible party should prepare a report, describing the initial site characterization and the Screening Level evaluation, to submit to DEQ. The report should discuss:

Site history,

Site description,

Current site use,

Sources and COI identified at the site,

Methods used to collect and analyze soil samples,

Locations of all samples (identified on a site map), including sample depths,

Results from soil chemical data analyses,

Methods used to collect and analyze ground water samples,

Locations, construction, and lithology of all wells,

Results of ground water chemical data analyses,

Other site hydrogeological test data results, and

QA/QC information.

SECTION 3 SCREENING LEVEL EVALUATION

Data collected during the initial site characterization is typically first evaluated using Screening Levels. The objectives of the Screening Level evaluation are to:

- Demonstrate that the site or portions of the site do not pose a threat to human health and hence does not require any further evaluation, and
- Identify areas of the site that need further evaluation.

The above objectives are achieved by comparing the maximum site concentrations with the Screening Levels.

3.1 SCREENING LEVELS

The Screening Levels for the petroleum COI in the rule have been developed by DEQ and are included in Table 2. The Screening Levels are risk-based target concentrations developed assuming residential receptors, using conservative input parameter values, an acceptable target risk of 10^{-6} , and a HQ of 1. Specific exposure factors and models used to develop Screening Levels are presented in Appendices A-1 and A-5. Screening Levels are the lowest target concentrations for the following exposure pathways and routes of exposure for soil, soil gas and ground water.

Specifically, Screening Levels for soil are the lowest of the following concentrations:

Surficial and Subsurface soil concentrations protective of exposure via ground water ingestion at MCL or risk-based concentrations at the downgradient edge of the source,

Subsurface soil concentrations protective of exposure via indoor inhalation of vapors emanating from soil for a residential scenario and

Surficial soil concentrations protective of combined ingestion, dermal contact, and outdoor inhalation exposures for a residential scenario.

Screening Levels for ground water are the lowest of the following concentrations:

Maximum contaminant levels for chemicals having MCLs or calculated values for ingestion of water in a residential scenario, and

Ground water concentrations protective of exposure via indoor inhalation of vapors emanating from groundwater for a residential scenario).

Screening Levels for soil vapor are protective of exposure via indoor inhalation of vapors emitted from contaminated soil or ground water. Screening levels in subslab and deeper soil gas (3-5 feet below ground surface) are derived by applying attenuation factors of 0.1 and 0.01, respectively, to the USEPA Regional Screening Levels for residential ambient air.

Table 2 lists the Screening Levels for unrestricted use. For comparison, Table 2 provides the risk based concentrations in soil and ground water for all the pathways and routes of exposure listed above. The Screening Level incorporated in the risk based corrective action rule for petroleum releases are indicated in bold.

As a result of the methods and assumptions used in the development of the Screening Levels and the current limitations of laboratory analytical methods the calculated Screening Levels may be lower than the practical quantitation limit reported by a laboratory for selected chemicals. In these situations site-specific review by DEQ will be required based on the criteria provided in Section 500 of the Petro REM rule and Appendix A-13.

3.2 COMPARISON OF SCREENING LEVELS WITH SITE CONCENTRATION

Based on the initial site characterization (discussed in Section 2), the owner/operator should identify the maximum soil and ground water COI concentrations at the site. These maximum concentrations are compared with Screening Levels, obtained from Table 2.

If the maximum site concentration for any COI does not exceed the Screening Level the site is eligible for closure, subject to other regulatory obligations (IDAPA 58.01.24.200) The responsible party may request DEQ approval for site closure. If the maximum site concentration for any COI exceeds the Screening Level, the owner/operator must select one of the following options:

Option 1: Adopt Screening Levels as cleanup remediation standards and develop a CAP (see Section 6).

Option 2: Perform a more detailed, site-specific evaluation (RE).

The owner/operator should clearly convey the chosen option to DEQ.

3.3 SCREENING LEVEL EVALUATION REPORT

The owner/operator must submit a Screening Level evaluation report to DEQ. The report should include, at a minimum:

Site maps indicating land use, structures on site, locations and depths of samples, and locations of sources,

A description of site history and activities leading to the release,

A description of current land use adjacent to the site,

A summary of initial site characterization results for soil and, as appropriate, groundwater,

A discussion of data quality,

A comparison of maximum soil and, as appropriate, ground water concentrations with Screening Levels,

A list of recommendations, and

Laboratory reporting sheets, including QA/QC data.

Comment [d1]: Reproduce Table from VI Appendix here

Table 2. Screening Level Concentrations for Soil, Groundwater, and Soil Vapor.

CHEMICAL	SOIL (mg/kg)			GROUNDWATER (mg/L)		DEEP SOIL VAPOR (ug/m3) (>3- 5 feet bgs)	
	Vapor Intrusion	Direct Contact	Groundwater Protection	Vapor Intrusion	Ingestion	Unrestricted Use Vapor Intrusion	Commercial/Industrial Vapor Intrusion
Benzene	0.091	8.5	0.018	0.044	0.005	31	160
Toluene	305	5680	4.9	382	1	520000	2200000
Ethylbenzene	0.071	36	10	0.11	0.700	97	490
Xylenes	1.7	3480	148	4.5	10	10000	44000
Naphthalene	0.078	50	5.2	0.102	0.21	7	36
MTBE	4.4	345	0.067	12	0.031	940	4700
1,2-Dichloroethane	0.03	3.4	0.011	0.074	0.005	9	47
Ethylene Dibromide	0.002	0.21	0.00014	0.004	0.00005	0.4	2
Acenaphthene	NA	2360	52	NA	0.626	NA	NA
Anthracene	NA	11,800	1040	NA	3.13	NA	NA
Benz(a)anthracene	7120	0.42	1.9	5.2	0.0001	0.9	11
Benzo(a)pyrene	1440	0.042	3.4	1.5	0.0002	0.09	1.1
Benzo(b)fluoranthene	908	0.42	0.75	1.7	0.0001	0.9	11
Benzo(k)fluoranthene	21,200	4.22	14	21	0.0008	0.9	11
Chrysene	480	41.9	33	2	0.008	9	110
Fluoranthene	NA	1570	364	NA	0.417	NA	NA
Fluorene	NA	1570	55	NA	0.417	NA	NA
Pyrene	NA	1180	359	NA	0.313	NA	NA

Values in bold are current Petro REM screening concentrations. Screening values for deep soil vapor are equivalent to USEPA Regional Screening Levels (EPA, 2010b) for residential and industrial ambient air multiplied by an attenuation factor of 100.

SECTION 4 SITE-SPECIFIC RISK EVALUATION

Conducting a site-specific risk evaluation requires the completion of several important steps. These include the development of a site conceptual model, identification of the chemicals present in environmental media, assessment of exposure and exposure pathways, assessment of the toxicity of the chemicals present, characterization of human risks, and characterization of the impacts or risks to the environment. This section describes each of these steps as well as the suggested format of some of the deliverables that assist in developing and documenting the evaluation.

4.1 SITE CONCEPTUAL MODEL

A site conceptual model (SCM) provides a convenient format to compile all the relevant data associated with a release and provides an overall understanding of the site. The SCM provides a framework for the entire project and can help identify specific data needs (the correct quality and quantity). It is necessary in the development of any data collection workplan and is also an important communication tool for regulators, owner/operators, and stakeholders.

In addition to basic site information, there are three key elements of the SCM that should be included in its development. Each element will require certain types of data in order to validate the SCM. The amount of data required is typically based on site-specific considerations. The SCM is a dynamic entity which should be revisited and potentially refined anytime additional data is collected for a site. The resulting refinement of the SCM should be incorporated if necessary into the risk evaluation.

The three key elements are:

SOURCES: Contaminant source areas (nature, magnitude and extent of release) and chemicals of concern.

PATHWAYS: Release, fate and transport mechanisms, exposure pathways and routes of exposure.

RECEPTORS: Land use and receptor characteristics.

More detailed information on these elements is provided below and in the sections on data requirements and exposure assessment.

4.1.1 SITE CHARACTERISTICS

The following basic site characteristics should be included in the risk evaluation:

Site history and map,

Ground surface condition,

Location of utilities on and adjacent to the site,

Location and description of site structures, and

Site lithology, hydrogeology and aquifer characteristics.

4.1.1.1 Site History and Map

A comprehensive chronology of events including remediation projects, tank removal activity, reported releases, etc. should be developed. The chronology of events must be clearly and accurately documented.

All maps should be made to scale, with a bar scale and north arrow. As appropriate, multiple site maps should be prepared to show monitoring points and locations of various site structures. A detailed facility map showing the layout of underground storage tanks (USTs), above ground storage tanks (ASTs), pipes, loading and unloading areas, sumps, paved and unpaved areas, canopy buildings, etc. should be prepared. A second facility map should be prepared to show locations of all on-site monitoring wells, water use wells, soil borings, soil vapor extraction wells, and soil excavation areas. All on-site structures should be clearly identified.

4.1.1.2 Ground Surface Conditions

Prior to performance of a risk evaluation, a site visit and walk through is highly recommended. It is important to document areas of the site that are paved, unpaved, landscaped, or covered with buildings. Also note the type, extent, slope, and general condition of the ground surface, and current land use.

4.1.1.3 Location of Utilities on and Adjacent to the Site

Due to potential for preferential flow of contaminated ground water and vapors into underground utility lines and conduits, a thorough documentation of the location of and potential impacts to underground utilities should be performed. Utilities may include phone lines, water lines, sanitary sewers, storm sewers, and natural gas lines. A combination of site observations, knowledge of buried utilities, and discussions with utility representatives and the site owner should reveal the utility locations.

At a minimum the following activities should be performed:

Locate all underground utility lines and conduits within the area of known or potential soil and ground water impact, both on site and off site, where the release may have migrated, or may migrate in the future.

Determine the direction of flow in the utilities (water, storm water, and sewage).

Identify utility lines/conduits on a base map that illustrates the extent of soil and ground water impacts.

Determine depth of utility lines/conduits relative to the depth of ground water. Seasonal fluctuations of ground water levels should be carefully evaluated. As appropriate, a cross-sectional diagram should be provided illustrating the depth to ground water and the locations and depths of the lines/conduits.

Determine any past impacts to utilities and any pertinent complaints that may have been previously filed with DEQ.

4.1.1.4 Existing Structures

The location, condition and construction characteristics of each structure on and adjacent to the site should be described.

4.1.2 CONTAMINANT SOURCE AREAS

This element of the SCM should include a discussion of the nature, location, timing, and magnitude of petroleum products spilled at the site. The petroleum COI should be determined. Based on the petroleum product released any actions performed as a part of emergency response should be delineated and their impact on the source evaluated. The residual size of the source after any emergency or interim actions should be determined.

Knowledge about the nature, magnitude, and extent of the release is necessary to identify the petroleum source in soil and/or the ground water at the site as well as to identify the petroleum COIs. The following information, if available, regarding a release is critical:

Release location,

Release quantity,

Petroleum product released, and

Interim corrective action measures performed.

Release-related information can be obtained by reviewing inventory records, interviewing current and past employees, and checking any spill incident reports filed with DEQ. Information related to site activities can also help identify source location and COIs.

4.1.2.1 Location of Release

The location of the release defines the petroleum source to soil and potentially to ground water. Likely release locations include, but are not limited to, corroded or damaged tanks, pipe bends and joints, and loading and unloading areas,.

The owner/operator should review operational history to determine the likely location of the. The assessment should focus on the identified release area, however, the exact location and timing of the spill source area may not be known. In these cases, soil and ground water sampling should be used to identify the extent (vertical and horizontal) of residual soil and/or ground water source. The exact number and location of necessary samples shall be determined on a site-specific basis using professional judgment. It will be important to understand the location and timing of past spills and releases in making decisions regarding assessment needs related to current releases. Consultation with DEQ prior to sampling is recommended, but not required.

4.1.2.2 Quantity of Release

The risk evaluation process does not necessarily require knowledge of the exact release quantity. However, an estimate of the amount released may help evaluate the severity of the impact and extent of contamination, and help in planning site characterization measures. Estimation of release quantities is typically based on inventory records.

4.1.2.3 Chemicals of Concern and Spatial and Temporal Trends

This section should include a discussion of chemicals detected in each media and their spatial and temporal distribution. As appropriate, contour maps of individual COIs may be useful. Graphs of COI ground water concentrations in individual wells and concentration along the flow line (concentration vs. distance plots) may be useful as well. Based on data collected over time, it should be determined whether the chemical concentrations are stable, declining, or expanding.

Identification of specific petroleum product(s) spilled or released is important to identify the petroleum COIs. Evaluation of non-petroleum chemicals in addition to those in Subsection 800.01 (Table 1) may be required by the Department when there is a reasonable basis based on site-specific information. A reasonable basis shall be demonstrated by the Department when it can show documentation of releases or suspected releases of other non-petroleum chemicals. The environmental behavior (mobility, persistence, bio-degradation, and inter-media transport) of the petroleum product and its adverse environmental and human health effects depend on constituent properties and their concentration in the petroleum product.

If a release can be identified as a single petroleum product based on a documented release, free product analysis, or location of impact (e.g., tank bottom of a particular product tank), only the COIs for that petroleum product need be analyzed. If the product released cannot be conclusively identified all petroleum COIs associated with the products suspected to have been stored at the site must be analyzed and additional assessment may be required to identify the source of the release

If previously collected data did not include all suspected site petroleum COIs, additional sampling may be necessary for petroleum COIs before a risk evaluation can be performed.

4.1.3 PATHWAYS AND TRANSPORT MECHANISMS

The objective for this portion of the SCM is to describe site characteristics and mechanisms which will influence the release, fate, and transport of chemicals of concern and which exposure pathways and routes of exposure will be most likely to occur.

4.1.3.1 Site Stratigraphy and Hydrogeology

The owner/operator should conduct a review of published literature and any investigations conducted on adjacent sites to determine regional hydrogeology, soil types, and aquifer characteristics. This evaluation should be used to determine the type and depth of aquifers in the area and whether they are confined, semi-confined, or unconfined. Regional information will help the owner/operator in efficiently collecting site-specific soil and ground water information. Provide a detailed discussion of site-specific stratigraphy and hydrogeology. Site stratigraphy should be determined based on boring logs and an adequate number of geologic cross sections.

The hydrogeologic discussion should include estimates of horizontal and vertical hydraulic gradients, seasonal variations in ground water elevations and flow direction, and hydraulic conductivity of relevant water bearing zones. How these characteristics may influence the fate and transport of chemicals to potential receptors should be discussed.

The survey should also locate potentially impacted surface water bodies located within 0.5 mile of the site. If a surface water body is identified, collect information including the type (perennial or intermittent), water flow rate, flow direction, depth of water, width or surface area of the water body, and water use. The water body must be located on an area map.

4.1.3.2 Complete Exposure Pathways and Routes of Exposure

A complete exposure pathway involves a source of petroleum products, release and transport mechanisms, routes of exposure, and potential receptors. Combining knowledge of the release, petroleum COIs, and site physical conditions (described above) with assumptions about land use and likely receptors leads to definition of complete exposure pathways.

The SCM should identify each of these components in the description of exposure pathways. One example of a common exposure pathway would be leaching of petroleum chemicals from a gasoline release in soils to the ground water with subsequent transport to a well where water is extracted and ingested for drinking water. Another would be volatilization of petroleum chemical vapors from a soil source with subsequent transport through the soil into an occupied structure where they are inhaled.

Another part of defining the complete or potentially complete exposure pathways and routes of exposure in a SCM is identifying the locations where exposure to petroleum chemicals can occur and the media of concern at those locations. These are exposure locations are commonly called exposure units. The exposure unit for each complete pathway and receptor should be described. The exposure unit may consist of a specific location such as a well or it may be an area, such as a parcel over which receptors move. For large sites it may be useful or necessary to subdivide the site into multiple exposure units. This may also be true at sites where impacts of the release have moved offsite.

The definition of exposure pathways in the SCM is subsequently used in the exposure assessment phase of the risk evaluation, which is described in detail in Section 4.3.

4.1.3.4 Protection of Ground Water

During the development of the SCM it should be assumed ground water may be used for drinking water. Consequently, where ground water is not remediated to levels suitable for ingestion, corrective action plans must also include provisions in the final remedy to implement activity and use limitations, through environmental covenants, to prevent exposure via ground water ingestion throughout the horizontal and vertical extent of the plume that exceeds the concentrations for ground water ingestion presented in Table 2.

The SCM, as it relates to the use of ground water, should include characterization and evaluation of the following ground water information.

- The current and historical use of the ground water for drinking water or irrigation.
- The location and approved use of existing ground water wells in a one half (1/2) mile radius from the contaminated site at the release point.
- The potential for communication between the impacted ground water and other ground water bearing zones or surface water.
- The location of delineated source water protection areas for public drinking water systems

This information, along with other data collected for the evaluation, will be used to determine if ground water ingestion is a complete exposure pathway in the SCM, guide the selection and application of appropriate remedial target concentrations, measures, timeframes and compliance conditions.

A water well survey should be conducted to identify all water use wells within a 0.5-mile radius. Information sources include the U.S. Geological Survey, the Idaho Department of Water Resources (IDWR), water system operators, and local residents. If available, well characteristics including depth, water use, and screened interval should be documented. Identification of dewatering wells located within a 1,000-foot radius of the site (or greater if the ground water plume is extensive) is necessary.

Land use considerations include, but are not limited to:

- Current zoning and land use. Consultation with local planning and zoning officials regarding future land use planning direction and interpretation of planning and zoning policies

- Land use development trends. Conversion of agricultural land to residential land uses requires development of drinking water sources. The proximity of these conversions to urban centers and available public drinking water supplies should be taken into account,
- Local ordinances that include agreements with IDWR governing well drilling or state designated restrictions or specifications for constructing wells into ground water in a locality for drinking water purposes,
- The existence of source water assessment delineations and source water protection plans and ordinances associated with public drinking water supplies, and
- The availability of alternative water supplies.

4.1.4 RECEPTORS AND LAND USE

This portion of the SCM describes the current and future land use assumptions as they relate to identifying potential receptors. The identification of land uses includes both the site of the release as well as adjacent properties which may be impacted by the release.

4.1.4.1 Land Use

Evaluating current and reasonably likely future land uses at and adjacent to the release site is a critical component when determining potential exposure points, exposure pathways, receptors, and exposure factors during the risk evaluation process and when determining cleanup concentrations.

Residential land use generally requires lower target concentrations. Cleanup to residential standards will usually allow unrestricted land use. Whenever assumed land use is other than residential and cleanup is not to residential standards, DEQ may require that an activity and use limitation be imposed on the property through the use of an environmental covenant.

For the risk evaluation process, examples of residential land use include:

Residential –Includes residential land uses and those with sensitive subpopulations. Examples of land uses with sensitive subpopulations include but are not limited to hospitals, nursing homes, schools, childcare centers, farms with houses, and any other areas/structures with sensitive human activity.

The responsible party should submit to DEQ illustrated land use maps clearly identifying current land uses at the site and the adjacent properties. One map should clearly show the area within 0.5 miles of the known or likely extent of contamination. At sites where there is likelihood that the extent of impacts may be greater, due to the magnitude of the spill or other site-specific conditions, a land use map covering the entire impacted and potentially impacted area is necessary. A walking land use survey within a 500-foot radius of the source, but with an emphasis on the downgradient direction and potential offsite impacts, should be conducted. The survey should clearly identify the following: schools, hospitals, residences (apartments, single-family homes), basements, day care centers, nursing homes, and types of businesses. In addition to this survey, identification of structures with basements (which may enhance the transport of contamination) should be pursued in areas in closer proximity to the source and where site conditions warrant it, such as where shallow ground water or NAPL is present. The map should also identify surface water bodies, parks, recreational areas, wildlife sanctuaries, wetlands, and agricultural areas.

Current land use refers to land use as it exists today and that can be readily determined by a site visit. A site visit should identify homes, playgrounds, parks, businesses, industries, or other land uses at, and in close proximity of, the release site. As appropriate, state or local zoning boards; the U.S. Bureau of the Census; zoning, topographic, land use, housing and other types of maps; and aerial photographs can provide information for determining land use.

Undeveloped land should be characterized by the most likely future use of that property, considering current zoning restrictions. If the undeveloped parcel is located in a predominantly nonresidential area, nonresidential classification may be appropriate. However, if the setting is more rural or land-use is mixed, the undeveloped land should be considered residential unless the responsible party develops and implements an activity and use limitation as a part of a CAP acceptable to DEQ.

The exposures to be evaluated in a risk evaluation depend upon the activities that could occur under likely future uses of land and ground water at the site. The future ground water use should be consistent with the most likely future land use.

For example, consider property that is currently used as farmland. If the impacted farmland includes a residence, the current land use is residential. However, if the responsible party provides information establishing clear plans to develop the residence into a nonresidential building in the near future, the likely future use may be evaluated as nonresidential.

While evaluating likely future land use(s) presents uncertainties, DEQ has identified certain factors that assist in this evaluation. These factors include, but are not limited to, local zoning ordinances; knowledge of current land use and changing land use patterns; zoning decisions; community master plans; interviews with current property owners; nonresidential appraisal reports; proximity to wetlands, critical habitat, and other environmentally sensitive areas, such as source water protection areas; and the use of remedial action institutional controls at a site.

Assumed future land use designations other than residential must be justified and there should be a high likelihood that the land will be used for those purposes. Absent such a justification, DEQ will consider the residential land use scenario as the default future land use.

Site characterization will include a determination of the on-site and off-site areas of impact. These areas are considered in determining the pathway-specific exposure units for each receptor. Exposure units are discussed in more detail in Section 4.3 and Appendix A-9.

4.1.4.2 Receptors

The objective of the risk evaluation is to quantify the adverse health effects to current and potential future receptors both onsite and offsite. For simplification, the following definitions should be used:

On-Site –The area located within the legal property boundaries within which the source of the release is located. This includes soil, ground water, surface water, and air within those boundaries. Adjacent property purchased subsequent to the release will be considered off-site.

Off-Site –The areas of concern located outside the boundaries of the property where the release source is located. This includes soil, ground water, surface water, and air located outside the property boundaries.

In a residential exposure scenario, risk is evaluated for either a child receptor or a composite receptor, depending on the specific exposure route, and whether the COI is noncarcinogenic, carcinogenic, or carcinogenic with a mutagenic mode of action. The composite receptor is based on a exposure duration of thirty years, and for some chemicals and exposure routes risk calculations incorporate modifications based on exposure occurring at different life stages.

For land uses other than residential, a typical receptor might be a commercial or industrial worker where the risk to adults is considered. Finally, under a construction scenario adult construction workers are considered. . If warranted by site-specific conditions other types of receptors may need to be defined and evaluated.

4.1.4.3 Ecological Risk Considerations

In addition to identifying potential impacts to human receptors the SCM should also attempt to identify potential pathways by which sensitive habitats, such as wetlands, surface water bodies, or other ecologically significant environments near the site, may be impacted by the release where wildlife may be the potential receptors.

Threatened and endangered species that may be exposed to site-specific chemicals should be identified. Note that within the risk evaluation process, protection of surface waters and streams is independent of ecological risk evaluation. As appropriate, a walking survey in the vicinity of the site may be necessary to identify ecological receptors.

Contact DEQ to obtain additional guidance on these issues.

4.2 DATA REQUIREMENTS AND EVALUATION

Once the site conceptual model has been developed an evaluation of data collection needs, data quality needs, and data collection methodology should be conducted. Depending on the amount and complexity of the proposed data collection effort a workplan may be needed to guide the data collection process. The suggested contents of this workplan are discussed in Section 4.7.

This section describes general data collection objectives and requirements for the risk evaluation process, the general QA/QC considerations to help ensure the data collected is of sufficient quality and quantity to meet desired objectives, the categories of data necessary to meet these objectives, and data collection techniques.

Data collection objectives for risk evaluation include, but are not limited to:

Accurately characterize the magnitude, nature and extent of contamination, including the characterization of petroleum chemical concentrations for all impacted media, as appropriate,

Allow the development and/or validation of an accurate site conceptual model, and

Develop sound estimates of risks posed by the release.

4.2.1 DATA COLLECTION PLANNING

Sound data collection planning involves a careful review all available site information and data for its suitability in the risk evaluation and, in the context of the SCM, identification of any data gaps with the goal of determining the types, locations, quality and numbers of samples or measurements needed.

Depending on where a given site is in the risk evaluation process, the relative importance of each of the objectives described above and specific data requirements will vary. The goal of data collection for risk evaluation should be to efficiently reduce uncertainty in those areas which potentially contribute the most to potential or actual risk and for which the greatest uncertainty exists.

For example, it may be determined through the site conceptual model that vapor intrusion represents the largest potential source of risk at a site, but little is known about subsurface conditions which may impact exposure point concentrations and only soil or ground water data are available. In order to more realistically model this pathway it may be most effective to better characterize subsurface stratigraphy and properties, document the conditions supporting biodegradation, and collect soil vapor data.

At many impacted sites, data collection efforts may have been conducted multiple times over an extended period of time. For example, interim corrective action measures may have been undertaken prior to planning for the risk evaluation. Soil and ground water data collected prior to such activities may not be representative of current conditions and should not be used in risk evaluation. At such sites, collection of additional soil and ground water concentration data may be needed after completion of interim corrective measures.

The exact number of samples required is a site-specific decision based on the balance between cost and representativeness and requires professional judgment and expertise. Numerous tools are available to assist in estimating the number of samples required for statistical analysis, but none provide a definitive number and statistical analysis may not be practical in many cases. These tools include, but are not limited to, data quality objectives (DQO) and statistical and geo-statistical evaluation. Following are selected references to assist in developing and completing sound data collection efforts.

EPA, 1992, Guidance for Data Usability in Risk Assessment, Part A, Office of Solid Waste and Emergency Response, 92857-09A, Office of Emergency and Remedial Response, Washington, D.C.

EPA, 1994, Guidance for the Data Quality Objectives Process, Office of Research and Development, EPA/600/R-96/055, Washington, D.C.

EPA, 1998, Guidance for Data Quality Assessment: Practical Methods for Data Analysis, Office of Research and Development, EPA/600/R-96/084, Washington, D.C.

EPA, 1997, Expedited Site Assessment Tools for Underground Storage Tank Sites, EPA/510 B-97-001, Office of Solid Waste and Emergency Response, Washington, D.C.

EPA, 1993, Data Quality Objectives Process for Superfund, Interim Final Guidance, EPA/540-R-93-071, Office of Solid Waste and Emergency Response, Washington, D.C.

EPA, 1986, RCRA Ground-Water Monitoring Technical Enforcement Guidance Document Draft, OSWER-9950.1, Office of Solid Waste and Emergency Response, Washington, D.C.

EPA, 1988, Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA, OSWER-9335.3-01, Office of Solid Waste and Emergency Response, Washington, D.C.

4.2.2 QUALITY ASSURANCE/QUALITY CONTROL CONSIDERATIONS

The risk evaluation process relies on site-specific data to make decisions related to the magnitude of site risk, nature and extent of remedial activity, and site-closure. Thus it is very important that data be reliable, representative, complete, and of known quality.

In order to assure the data will be of appropriate quality, QA/QC activities must be applied throughout the site characterization and environmental data collection process.

Elements of QA/QC include:

Using approved methodologies to collect data

Decontaminating field equipment as appropriate

Using EPA approved methods for laboratory analysis

Including QA/QC samples, such as travel blanks, trip blanks, etc.

While the level of QA/QC applied to data collection efforts will vary (depending on factors such as site complexity, size of the release, and the immediacy of the response) all the elements of QA/QC described above that were used during a given data collection effort should be provided to DEQ when reporting the results of environmental sampling. This will allow an adequate review of the quality of the data used in the analysis.

If a work plan is submitted to DEQ for approval, it should include a Quality Assurance Project Plan (QAPP). The QAPP integrates the appropriate technical and quality aspects of a project, including planning, implementation, and assessment. The purpose of the QAPP is to document planning for environmental data collection and to provide a project-specific “blueprint” for obtaining the type and quality of data needed for a specific decision or use. The QAPP documents the QA/QC procedures applied to various aspects of the project to assure that the data obtained are of the type and quality required.

The EPA has developed guidance for the development of QAPPs which can be obtained at:

<http://www.epa.gov/quality/qs-docs/g5-final.pdf>

To further assist in the development of a QAPP, DEQ has also developed an abbreviated QAPP form. The purpose of the abbreviated QAPP form is to provide the user with an annotated outline format of a QAPP with all the required information headings. From there it is a simple matter to fill in appropriate site-specific information applicable to each heading or section. The abbreviated QAPP form is reproduced in Appendix A-14.

Documentation of all QA/QC efforts implemented during data collection, analysis, and reporting phases is important to data users, who can then consider the impact of these control efforts on data quality.

The QAPP is implemented during the data collection process. Problems can be identified and corrected at this stage. The impact of field and laboratory techniques and sampling and analysis conditions on data quality are determined using field and laboratory QC samples and periodic audits. Oversight and corrective action can prevent improper procedures or techniques from continuing.

Data verification, validation, and assessment should be performed to validate data quality and assess data quality and usability. Data verification and validation is particularly dependent on compliance with field and laboratory procedures for sample collection, identification, handling, preservation, chain of custody, shipping, analysis, and reporting.

USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (EPA, 1999) provide guidance for performing verification and validation of contract laboratory program (CLP) data and may be used as guidance for non-CLP data verification and validation.

4.2.3 DOCUMENTATION OF THE DATA COLLECTED

Once data have been collected, a field investigation report should be prepared and include:

Dates when data were collected and names of individuals who collected the data.

A list of data collected and reference to any work plan that may have been followed.

All data collected, clearly tabulated, and contoured (if necessary),

All boring logs and relevant cross-sections, where appropriate, to depict site stratigraphy,

All QA/QC data, laboratory results, and chain of custody forms,

Contour maps of ground water potentiometric surface indicating the predominant direction of ground water flow, and

A discussion of the SCM.

4.2.4 DATA COLLECTION METHODS

The common categories of data that are the focus of data collection efforts for risk evaluation include:

Vadose zone soil characteristics,

Saturated zone characteristics, and

Distribution of COIs in soil, soil vapor, ground water, and surface water bodies.

DEQ has developed default values for many of the vadose and saturated zone characteristics that affect the fate and transport of COIs. These values are presented in Appendix A-2. For site-specific risk evaluations these default values can be used or site-specific values can be obtained.

This appendix describes typical collection methods for those properties of the vadose zone and saturated zone important for risk evaluation. It also addresses the collection of chemical concentration data from these media.

4.2.5 VADOSE ZONE SOIL CHARACTERISTICS

The vadose zone or unsaturated zone soil is the media through which COIs can migrate to the ground water and vapors move upward to the surface or into an enclosed space. Thus, characteristics of vadose zone soils have considerable impact on risk estimates and target concentration calculations. Relevant vadose zone characteristics include:

Vadose zone thickness and depth to ground water,

Porosity,

Water and air content,

Fractional organic carbon content, and

Bulk density.

In addition to parameters mentioned above, additional site-specific, pathway-specific parameters that may be valuable to measure include:

Vapor permeability, effective diffusion coefficient, and building characteristics where indoor inhalation is a potentially complete pathway, and

Infiltration rates for developing a detailed evaluation of leaching potential to ground water.

4.2.5.1 Thickness of Vadose Zone and Depth to Ground Water

Vadose zone thickness is determined from boring logs. This thickness is the distance from the ground surface to the depth at which the water table is encountered, less capillary fringe thickness.

Depth to ground water is used in estimating vapor emissions from ground water. For indoor inhalation, depth to ground water below the “floor” of an existing structure of concern or the most likely location of a future structure should be used.

For sites with considerable seasonal fluctuation in water table level, depending on the data available and the nature of the fluctuations, a yearly average depth or a time weighted depth may be used. The vadose zone depth that is estimated should also form the basis for the selection of soil samples to be used in evaluation of subsurface soil vapor emissions to indoor air. Shallower water table depths often result in lower ground water target levels protective of inhalation pathways.

4.2.5.2 Dry Bulk Density

Dry bulk density is the dry weight of a soil sample divided by the field volume of the soil sample. An accurate measurement of bulk density requires determining the dry weight and volume of an undisturbed sample. This method involves collecting a core of known volume, using a thin-walled sampler to minimize disturbance of the sample, and transporting the core to a laboratory for analysis. This method is described in American Society for Testing and Materials (ASTM) Method D2937-00, Standard Test Method for Density of Soil in Place by the Drive-Cylinder Method (ASTM, 2000a).

4.2.5.3 Porosity

Porosity is the ratio of the volume of voids to the soil sample volume. Many laboratories use dry bulk density and specific gravity data to determine porosity using the following equation:

$$n = 1 - \rho_b / \rho_s \quad (4-1)$$

where,

- n = porosity (cc/cc)
- ρ_b = dry bulk density (gm/cc)
- ρ_s = specific gravity or particle density (gm/cc)

The Standard Test Method for Specific Gravity of Soil, ASTM Method D854-00 (ASTM, 2002), may be used to determine specific gravity. If specific gravity is not assessed, then 2.65 gm/cc can be assumed as the particle density. If site-specific values of porosity are not available, it should be estimated from an appropriate literature source.

For measuring porosity and bulk density of soil, an undisturbed sample is necessary. Such a sample can be collected using a Shelby tube or a similar coring device. Consideration must be given to collecting multiple samples if multiple lithologies are present that might affect COC transport.

4.2.5.4 Volumetric Water Content/Moisture Content

Volumetric water content is the ratio of water volume to the total soil. The ASTM Method D2216-98, Standard Test Method for Laboratory Determination of Water [Moisture] Content of Soil and Rock by Mass (ASTM, 1998) is a gravimetric oven drying method. The water content value used in most models is the volumetric water content.

Hence, it may be necessary to use the following equation to convert gravimetric water content to a volumetric basis:

$$\theta_{wv} = \theta_{wg} * \frac{\rho_b}{\rho_l} \quad (4-2)$$

where,

- θ_{wv} = volumetric water content (cc water/cc soil)
- θ_{wg} = gravimetric water content, typically reported by the laboratory
(gm of water/gm of soil)
- ρ_b = dry bulk density (gm of dry soil/cc of soil)
- ρ_l = density of water (gm/cc)

Volumetric water content can also be measured in the field through the use of a variety of instruments such as a neutron probe, time domain reflectometry, or gypsum block sensors. For more information on these methods see Part VII of Wilson et al. (2000).

4.2.5.5 Fractional Organic Carbon Content in Soil

Fractional organic carbon content is the organic carbon weight in the soil divided by soil weight and is expressed either as a ratio or as a percent. The Walkley Black Method (Page et al., 1982) is a chemical oxidation method (rapid dichromatic oxidation) while ASTM Method 2974-00 is a furnace method (ASTM, 2000b) for determining fractional organic carbon content in soil. Results are usually reported as percent organic carbon content. The reported value can be converted to a fraction by dividing by 100.

If measurements of total organic matter content are available, they should be divided by 1.724 to estimate the fractional organic carbon content. This adjusts for the portion of soil organic matter that is actually carbon. Typically, total organic carbon content is estimated using ASTM Method 2974-00. Organic carbon content should be determined using soil samples not impacted by the release.

4.2.6 SATURATED ZONE CHARACTERISTICS

Petroleum COIs that reach the water table typically travel horizontally in the saturated zone. However if a vertical gradient is present, chemicals may also move vertically in the direction of the gradient. Saturated zone characteristics that determine the travel time and direction for the petroleum COIs include:

Horizontal hydraulic conductivity

Horizontal and vertical hydraulic gradients (magnitude and direction)

Saturated zone soil characteristics (fractional organic carbon content and porosity)

4.2.6.1 Hydraulic Conductivity

Hydraulic conductivity is the discharge of water per unit area per unit hydraulic gradient in a subsurface formation. Estimates of site-specific hydraulic conductivity can be obtained by conducting aquifer tests such as slug or pump tests. Data gathered during the tests are then analyzed using appropriate methods. Slug tests are easier to conduct than pump tests, generate no wastewater for treatment, and may be more appropriate for low permeability formations. The primary disadvantages are the small aquifer volume that is explored, resulting in the need to conduct multiple tests across the site. Properly conducted pump tests will often provide better estimates of hydraulic conductivity. The simplest pump tests are single well short duration (2 to 4 hours) tests. The best pump tests employ a pumping well and multiple observation wells and are of longer duration (12 hours or more). These tests will identify boundary effects. Regardless of the type of test conducted, different methods of data analysis will often yield different estimates of hydraulic conductivity. ASTM Method D4043 provides guidance on the selection of aquifer test methods (ASTM, 1996).

In the absence of these tests, estimates of hydraulic conductivity may be obtained from literature values corresponding to the type of soil in the saturated zone, using empirical equations based on the grain size distribution of the porous formation, or using specific capacity data from well logs of wells in the vicinity of the site that are representative of the aquifer being investigated. In either case, adequate references and justification for the value chosen should be provided.

4.2.6.2 Hydraulic Gradient

The magnitude and direction of the hydraulic gradient is estimated by comparing water levels measured in the monitoring wells. Typically, water level contour maps are prepared based on measured data using a computer program or manual calculations along with professional judgment. Calculations done using automated procedures should be spot-checked with hand calculations. A minimum of three wells is needed to adequately estimate the direction of flow and magnitude of the gradient. When drawing the contour maps, care should be taken to ensure that measurements in monitoring wells screened in the same interval or hydrologic unit are used.

For sites that have seasonal variation in hydraulic gradient, estimate the average hydraulic gradient for each season. Consideration should also be given to determining any vertical gradients. This requires a comparison of adjacent water levels in wells screened in different intervals.

In areas where the shallow aquifer has been impacted and a deeper aquifer is used for drinking water, the vertical gradient should be determined. When drilling deep wells, care should be taken to avoid cross contamination.

4.2.6.3 Saturated Zone Soil Characteristics

In addition to hydraulic conductivity, other important saturated zone soil characteristics include fractional organic carbon content, porosity, and bulk density. These parameters are required to quantify the movement of chemicals within the saturated zone. The laboratory methods to measure these parameters were discussed in Section 4.2.5.

4.2.7 INDICATORS OF BIODEGRADATION

Biodegradation of petroleum chemicals occurs in all media (ground water, soil, soil vapor). Depending on the media different indicators (chemical concentrations, geochemical indicators, microorganisms, oxygen and carbon dioxide) can be measured at a site to demonstrate the occurrence of biodegradation of these organic substances.

When evaluating the potential for biodegradation in ground water these indicators are commonly classified into three groups: primary, secondary, and tertiary lines of evidence. Data collected under each line of evidence can be evaluated qualitatively or quantitatively to determine the occurrence of biodegradation.

The primary line of evidence demonstrates spatial stability or a reduction in chemical concentrations at a site by evaluating measured concentrations within monitoring wells, ground water velocity, rates of contaminant transport, and time of the release.

The secondary line of evidence refers to measurement of geochemical indicators including reduction-oxidation (REDOX) potential, dissolved oxygen, dissolved nitrates, manganese, ferrous iron, sulfate, and methane. These indicators should be measured in at least three wells located along the flow line. The wells used should be located at a background or upgradient location, within the plume near the source, and within the plume downgradient from the source.

The tertiary line of evidence involves the performance of microbiological studies such as identification of types of subsurface microbial and microbe cell counts.

Commonly used methods to estimate biodegradation rates include mass balance analysis for expanding, stable, or shrinking plumes and plume concentration vs. distance plots. Additional details on biodegradation for petroleum COIs in ground water are provided in Appendix A-8.

When evaluating the potential for or presence of biodegradation in soil or soil vapor the most common indicators used are soil vapor concentrations, oxygen, and carbon dioxide. These are commonly measured at multiple depths in the subsurface and related to a potential source. More information on evaluation of biodegradation of petroleum vapors in relation to the vapor intrusion pathway is provided in Appendix A-7.

4.2.8 DISTRIBUTION OF PETROLEUM CHEMICALS OF INTEREST

Petroleum COI may be distributed between soil, soil gas, ground water, surface water, and sediments present at a release location. Knowledge of contaminant distribution entails a determination of the spatial extent and magnitude of concentrations in each of these media, where they are present.

4.2.8.1 Distribution of Petroleum Chemicals of Interest in Soil

Adequate soil concentration data are necessary to estimate risk to receptors, compare representative concentrations for each complete pathway to target levels, and define the soil source dimensions. Sufficient data should be collected to define horizontal and vertical extent of impacts. The vadose zone investigation(s) should be organized to:

Identify the horizontal and vertical extent of soil impacts. Unless otherwise directed by DEQ, the extent of impact should be defined as those areas where petroleum COI concentrations exceed Screening Level concentrations.

Identify areas of maximum concentration of petroleum COIs.

Collect samples adequate to estimate exposure point concentrations for the potentially complete exposure pathways that have been defined based on the SCM.

To determine the spatial extent of contamination, soil borings should be drilled starting from the known or suspected source area and drilling outwards until borings with sample concentrations at or below Screening Levels are reached in all directions. To determine the vertical extent of contamination, soil borings should be extended to the base of petroleum impact and samples collected from surface and subsurface soil zones as explained in the following sections.

The soil analytical data should help identify the soil source area. If more than one source area is identified at a site, each source area should be evaluated separately. Once the soil source(s) is identified, source dimensions can be estimated. These dimensions are used in the computational software which accompanies the guidance and rule, along with other input parameters, to estimate , risk and RATL concentrations protective of indoor inhalation and to evaluate the soil to ground water leaching pathway. Depth to subsurface soil source (used to estimate the target concentrations) should be the depth, in the source area, from the surface to the zone where concentrations are above quantification limits. Professional judgment should be used in choosing the representative depth.

4.2.8.1.1 Surficial Soil Sampling

The risk evaluation process distinguishes between surficial soil and subsurface soil zones. Surficial soil is defined as the soil zone from the ground surface to 1 foot below ground surface. Pathways that may apply to the surficial soil zone include direct contact exposure via incidental ingestion, inhalation of vapors and particulates, dermal contact, and leaching of petroleum COIs to ground water and surface water.

Evaluation of soil exposure pathways within the surficial soil zone requires collection of an adequate number of soil samples to estimate both maximum and representative concentrations of all potential petroleum COIs. Given the small vertical depth interval of this soil zone, close attention should be given to vertical variations in contamination. The acceptability of vertical depth-composite samples versus samples from discrete depth intervals is a site-specific decision. Criteria that influence this decision include the type of COIs, vertical extent of contamination, and areal extent of the contaminated zone. Sampling within the surficial soil zone is typically done from test pits using hand samplers such as trowels or corers.

The presence of impervious (paved) surfaces poses difficulties for sampling. In some cases, very permeable material may be located 2 inches below the pavement. Residues from the paved surface may also be present. When sampling beneath impervious surfaces, sampling should begin 2 inches or deeper below concrete or asphalt pavement. Cracked areas in impervious surfaces may represent conduits for chemical migration or leaching and should be evaluated during the selection of sampling locations.

4.2.8.1.2 Subsurface Soil Sampling

Soil below the surficial soil zone (greater than one foot below ground surface) and extending to the water table is termed the subsurface soil zone. Pathways evaluated for this zone include volatilization from soil to indoor air and leaching to ground water and surface water. Most receptors will not have direct exposure to this soil. However, some construction workers may be involved in excavation activities below the surficial soil zone and subsurface soil removed during excavation may be deposited at the surface allowing greater exposure. This possibility should be considered during the development of the site conceptual model.

To test for indoor inhalation of vapors from subsurface soils, it is preferable to collect soil gas data however soil data can also be used. Soil samples should be collected to characterize the complete horizontal and vertical extent of contamination. Soil moisture conditions and soil vapor permeability are also important parameters affecting soil vapor transport. If petroleum contamination exists adjacent to existing structures, additional sampling should be focused in these areas. More information on evaluation of the vapor intrusion pathway is provided in Appendix A-7.

To test for exposure to a construction or utility worker during excavation activities, soil samples should be collected from both surface and subsurface soil zones to depths where construction-related activities are likely to occur.

To test for leaching of petroleum COIs in soil to ground water, determining the thickness of the contaminated soil zone, distance from the bottom of the contaminated zone to the water table, if any, and representative concentration of petroleum COIs within the contaminated zone is critical.

Soil sampling must be done in accordance with the following guidelines and procedures:

Samples must be collected from the source area(s). Samples must be collected to determine the full horizontal and vertical extent of soil contamination. Sampling should strive to characterize any horizontal or vertical stratigraphic variation at the site that could impact petroleum COI fate and transport. Where required to fully characterize the vertical extent of contamination, borings should be extended to the water table and features such as the capillary fringe and any smear zone, if encountered, should be characterized. Vertical sampling intervals should not be greater than 5 feet.

Soil borings should be logged and samples for laboratory analyses collected in accordance with current industry practice.

All samples must be adequately preserved according to requirements of the laboratory analyses and analyzed within holding times required by each method. Sample analyses must be conducted in accordance with current, EPA Office of Solid Waste and Emergency Response SW-846 Methods, or other accepted methods.

Adequate QA/QC procedures must be used to ensure sample quality and integrity. Section 4.2.2 contains additional information on QA/QC considerations.

All sampling equipment must be decontaminated using current state of industry practice such as described in ASTM D-5088-90, Practice for Decontamination of Field Equipment Used At Nonradioactive Waste Sites (ASTM, 1990).

Abandonment of boreholes that extend to the water table, which are considered wells by IDWR, should follow IDWR abandonment procedures (IDAPA 37.03.09.16). Appropriate methodology for abandoning other boreholes is described in detail in the Standard Guide for Decommissioning Ground Water Wells, Vadose Zone Monitoring Devices, Boreholes, and Other Devices for Environmental Activities, Standard Guide D5299-99 (ASTM, 1999a).

4.2.8.1.3 Subsurface Soil Gas Data

At sites where petroleum COIs in soil or ground water are volatile and there is concern about potential indoor inhalation of vapors, it may be useful to assess soil vapor concentrations. For details about these samples, refer to Appendix A-7 (Evaluation of the Vapor Intrusion Pathway).

4.2.8.1.4 Logging of Soil Boreholes

Each soil boring must be logged to record depths correlating with changes in lithology (with lithologic descriptions), soil vapor (e.g., photo-ionization detector) analyses, occurrence of ground water, total depth, visual and olfactory observations, and any other pertinent data.

When a monitoring well is installed, as-built diagrams with depth to ground water and construction details must be submitted for each well. A continuous soil profile from at least one boring with detailed lithologic descriptions may be useful. Particular emphasis should be placed on characteristics that control chemical migration and distribution, such as zones of higher or lesser permeability, changes in lithology, correlation between soil vapor concentrations and different lithologic zones, obvious areas of soil discoloration, organic content, fractures, and other lithologic characteristics.

4.2.8.2 Distribution of Petroleum Chemicals of Concern in Ground Water

Adequate ground water samples should be collected to delineate the extent of free product, dissolved contaminant plumes in all directions, maximum COI concentrations and representative concentrations based on the SCM. This sampling should take into account knowledge of the soil source and the direction of ground water flow.

4.2.8.2.1 Ground Water Sampling

If ground water has been impacted, temporary sampling points may be used to screen levels of ground water impacts and to assist in determining optimal locations of permanent monitoring wells. A sufficient number of monitoring wells should be installed to identify source areas, document COI migration and ground water flow. The monitoring wells should be installed in accordance with current Idaho Department of Water Resources (IDWR) rules (IDAPA 37.03.09) and industry standards such as ASTM D 5092-95, Standard Practice for Design and Installation of Ground Water Monitoring Wells in Aquifers (ASTM, 1995b). EPA documents such as the RCRA technical guidance for ground water monitoring (EPA, 1986, 1992a) are also useful references.

Adequate numbers of monitoring wells must be installed to sufficiently delineate the horizontal and the vertical extent of the ground water plume. Well placement and design must consider the concentration of petroleum COIs in the source area, and the occurrence of non-aqueous phase liquid (NAPL) at the site. Monitoring wells should also be installed in adequate numbers and locations that will also allow a site-specific estimate of the direction of groundwater flow..

Well casing and screen materials must be properly selected. The screen interval length should be minimized to the extent possible but should be set at least 2 to 3 feet above the expected high water table and encompass the range of expected variation in water table depth. EPA (1992) recommends lengths of 10 to 15 feet except where specific monitoring objectives or site knowledge result in other requirements. Wells must be properly developed and gauged after installation. A site survey must be conducted to establish well casing elevations. Based on the ground water elevations, ground water flow direction and gradient should be determined and plotted on a map.

Ground water samples must be collected in accordance with the following guidelines and procedures:

Monitoring wells must be purged the adequate number of well volumes prior to collecting a sample (usually 3 to 5 volumes). Low-flow purging and sampling techniques (EPA, 1996) may also be acceptable when included in a DEQ approved quality assurance project plan (QAPP).

Samples must be collected using EPA approved methods and equipment.

All samples must be adequately preserved according to the requirements of the laboratory analyses and analyzed within holding times required by each method.

Sample analyses must be conducted in accordance with and EPA Office of Solid Waste and Emergency Response SW846 Methods, or other accepted methods.

Adequate QA/QC procedures must be used to ensure sample quality and integrity. See section 4.2.2 for additional information on QA/QC considerations. All sampling equipment must be decontaminated using current state of industry practice such as described in ASTM D-5088-90, Practice for Decontamination of Field Equipment Used At Nonradioactive Waste Sites (ASTM, 1990).

If the plume is not delineated in all directions, locations of new monitoring wells must be chosen based on ground water flow direction and location of the soil source area.

4.2.8.3 Surface Water and Sediment Sampling

Appropriate samples should be collected when COI migration is known or suspected to have impacted surface water. Water samples should be collected from upstream and downstream of a ground water discharge point. Sediment samples should be collected if the SCM indicates a potential for releases to surface water.

In places where a ground water plume may discharge into a stream, it is necessary to estimate the discharge concentration into the stream. This can be achieved by installing one or more monitoring wells or temporary wells within the plume adjacent to the stream.

4.3 EXPOSURE ASSESSMENT

The goals of the exposure assessment portion of the risk evaluation are to:

Characterize the physical setting

Identify potentially exposed populations

Identify complete or potentially complete exposure pathways

Estimate exposure concentrations and

Estimate petroleum chemical intakes.

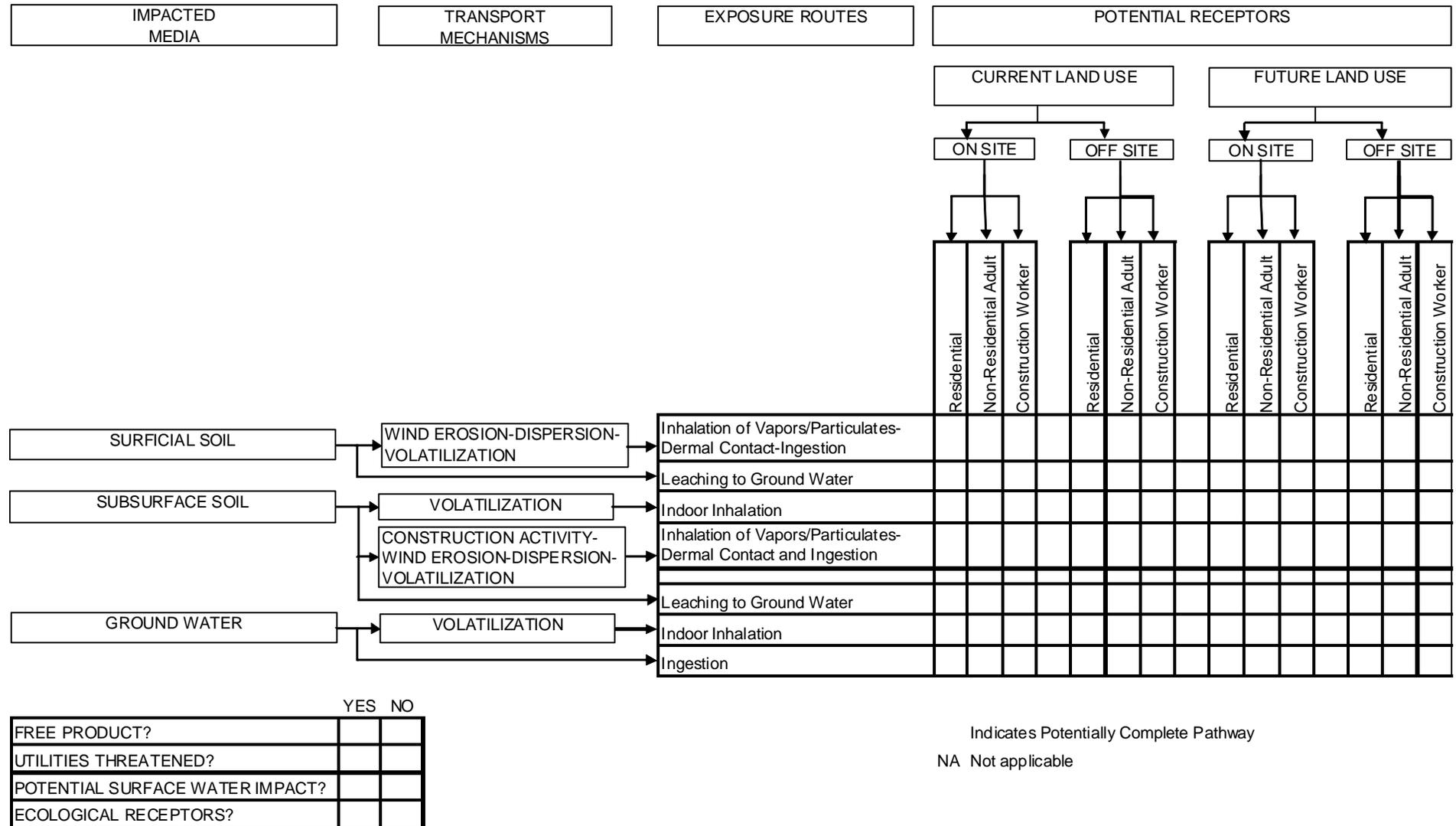
The exposure assessment uses much of the data collected in support of and assumptions contained in the site conceptual model (described earlier in Section 4.1).

4.3.1 Physical Setting

Characterization of the physical setting for exposure assessment identifies those site factors which may influence the fate and transport of chemicals from the source to a receptor. These factors include climate, meteorology, geologic and hydrogeologic setting, soil types, biodegradation potential, and surface water hydrology. When these factors are considered in the context of the media from which COIs are released (surficial soils, subsurface soils, ground water, surface water, etc.), the transport mechanisms for the COIs from each media (leaching, ground water transport, volatilization, etc.), and the chemical concentrations and distribution of the COIs in each media, the potential for a chemical to reach a receptor can be assessed. A more thorough discussion of the data needs related to description of the physical setting can be found in Section 4.1 (Site Conceptual Model).

If the migration of petroleum chemicals to a receptor or contact by a receptor is not possible (e.g., due to formal engineering controls such as a paved site that will prevent human contact with petroleum contaminated soil) under current and most likely future land use conditions, the site-specific petroleum COI concentrations may not pose risk.

Figure 2. Graphical Display of a Site Conceptual Model



4.3.2 Potentially Exposed Populations/Receptors

Potential exposure populations/receptors should be identified from the information contained in Section 4.1 of the Site Conceptual Model.

4.3.3. Exposure Pathways

A receptor comes in contact with petroleum COIs through a complete exposure pathway. For a pathway to be complete, there must be (1) a source of petroleum, (2) a mechanism by which the petroleum is released, (3) a transport medium through which petroleum travels from the point of release to the receptor location, (4) a route of exposure (ROE) by which the petroleum chemical enters the receptor's body (ingestion, inhalation, or dermal contact) and (5) a potential receptor. If the migration of petroleum chemicals to a receptor or contact by a receptor is not possible (e.g., due to formal engineering controls such as a paved site that will prevent human contact with petroleum contaminated soil) under current and most likely future land use conditions, the site-specific petroleum COI concentrations may not pose risk.

DEQ has identified the most commonly encountered exposure pathways for various environmental media for which an evaluation must be conducted. These pathways are discussed below. At sites where receptors, exposure pathways, or ROE other than those discussed below are important, the responsible party must identify them and discuss their quantitative evaluation with DEQ. In some cases it may be determined that one or more of the pathways are incomplete and therefore do not need to be quantitatively evaluated. Adequate justification for exclusion of these pathways must be provided to and approved by DEQ.

4.3.3.1 Pathways for Surficial Soils (0 - 1 foot below ground surface)

Surficial soils are defined as soils extending from the surface to 1 foot below ground surface. For construction worker exposure the applicable depth is the depth of excavation. The exposure pathways associated with impacted surficial soils include:

Ground water protection (leaching of petroleum chemicals from soil to ground water with subsequent potential ingestion of ground water),

Surface water protection (leaching of petroleum chemicals from soil to ground water with subsequent migration to a surface waterbody), and

Ingestion of soil, outdoor inhalation of vapors and particulate emissions from soil, and dermal contact with soil.

4.3.3.2 Pathways for Subsurface Soils (1 foot below ground surface to the water table)

Subsurface soils are defined as soils extending from 1 foot below the ground surface to the water table. The exposure pathways associated with subsurface soils include:

Indoor inhalation of vapor emissions from soil,

Ground water protection (leaching of petroleum chemicals from soil to ground water with subsequent potential ingestion of ground water), and

Surface water protection (leaching of petroleum chemicals from soil to ground water with subsequent migration to a surface waterbody).

4.3.3.3 Pathways for Ground Water

Potentially complete exposure pathways for impacted ground water include:

Indoor inhalation of vapor emissions from ground water, and

Current and/or future ingestion of water on or off site.

Appendix A-5 describes in detail the process used to evaluate potential exposure via indoor inhalation of vapors from soil and ground water.

4.3.3.4 Pathways for Surface Water and Sediments

Depending on the beneficial use designation of impacted surface waters, complete pathways for surface water include:

Intentional ingestion of surface water and ingestion of fish when surface water is used as a drinking water supply, and ingestion of fish from surface waters designated for recreational use.

4.3.3.5 Other Exposure Pathways

Other complete or potentially complete exposure pathways, such as ingestion of produce grown in impacted soils, ingestion of fish, contact with contaminated sediments, or use of ground water for irrigation purposes, should be evaluated on a case-by-case basis. The owner/operator should contact DEQ for further guidance.

4.3.4 Exposure Point Concentrations

Exposure point concentrations are the average petroleum chemical concentrations to which receptors are exposed over a specified duration within a specified geographical area. The geographical area about which a receptor moves and contacts contaminated media during the specified exposure duration is termed an exposure unit (EPA, 2001). The exposure unit of all receptors must be considered and described. The exposure unit, or spatial area over which a given receptor is likely to be exposed, must be established for on-site receptors as well as any off-site impacted or potentially impacted receptors and for each exposure pathway or route of exposure. The same site may have different exposure units for current and future use scenarios.

A detailed discussion of the estimation of exposure point concentrations and the use of exposure units for risk evaluation is provided in Appendix A-9. This appendix describes the sources of uncertainty which affect the estimation of exposure point concentrations, strategies to reduce this uncertainty, and methodologies to evaluate data quality. It also provides guidance on the selection of appropriate data for various routes of exposure and appropriate statistical methods for analysis of available data.

The Risk Evaluation (RE) report should clearly identify specific data and method used to estimate the exposure point concentrations, and provide a rationale for the method used. The following information should be provided in a table:

Media

Route of Exposure/Pathway

Receptor

Data Used

Method of Estimation

Table 4 shows how such a table might be constructed with examples of the type of information that would be supplied.

Table 4. Example Table Describing Derivation of Exposure Point Concentrations

Media	Route of Exposure	Receptor	Data Used	Method
Surficial Soil	Direct Contact	Construction Worker	Unpaved Area	Average
Subsurface Soil	Indoor Inhalation	Commercial Worker	Building Footprint	Maximum
Ground Water	Ingestion	Residential	Source Area	UCL
Soil Vapor	Indoor Inhalation	Commercial Worker	Sub-slab or deep soil vapor samples	Maximum

As presented in Table 6, an exposure point concentration is estimated for each complete ROE. Various methods available to estimate the representative concentrations are discussed in Appendix A-9. Use of the maximum concentration as the representative concentration is most conservative and also the easiest to calculate when compared with other representative concentrations (average, area-weighted average, upper limit of the confidence interval around the mean). Thus, if the risk calculated using the maximum concentration is acceptable, considerable computational effort can be avoided.

4.3.4.1 Soil

Exposure point soil concentrations used to evaluate protection of the ground water pathway should be calculated based on soil data collected within the source area only.

Soil data from the most recent investigation (assuming it was a comprehensive investigation) should be used. The use of older (> 4 years old) soil data, while discouraged, may be acceptable if site conditions that would result in an increase in COI concentrations (such as a new release) have not changed. If a new release has or may have occurred, additional soil assessment activities adequately characterizing current conditions should be performed. New data collection efforts may be documented in a work plan and submitted for approval by DEQ.

4.3.4.2. Ground Water

Based on the SCM, several exposure point ground water concentrations may have to be estimated at a site. These could include exposure point concentrations for the source area, at compliance locations, for protection of indoor inhalation on site and offsite, and for off site areas. Estimation of these concentrations will often require the use of fate and transport models, discussed in Section 4.3.5.

In order to account for site specific conditions such as source characteristics in relation to the depth to ground water and the age of the release, it is typically necessary to perform multiple sampling events over time in order to ensure that the potential for the release to impact ground water has been accounted for and that ground water concentrations are representative. However if these factors can be accounted for it may be possible to perform an RE using data from one sampling event. If temporal data indicate significant variability, additional sampling events may be required prior to conducting the RE. Subsequent to risk evaluation, DEQ may require additional monitoring data to be collected. If recent ground water data (< one year old) is unavailable, current data may be necessary for the RE. The Owner/Operator may elect to document data collection objectives in a work plan submitted to DEQ for review and approval .

4.3.4.3 Point of Exposure and Point of Compliance

The Point of Exposure (POE) is the location where a receptor comes in contact with COIs under current and likely future conditions. A separate POE is associated with each complete exposure pathway-receptor combination identified in the SCM. For direct exposure pathways, the POE is located at the source of the petroleum COIs. For example, for the ingestion of surface soil, the POE is at the same location as the soil source. For indirect exposure pathways, the POE and the source of petroleum COIs are physically separate. For example, for the case of indoor inhalation of vapors from soil, the POE is inside the building (the breathing space) whereas the source is the soil below and adjacent to the building. The POE location for the protection of the ground water for ground water ingestion is discussed in Section 4.1.3.3.

A point of compliance (POC) is a location where concentrations are measured to determine if compliance with remedial goals has been achieved. Concentration measurements at the POC may be in any media (e.g., soil, ground water, soil vapor, etc.). The location of a POC may be identical to the POE or may be located between the source and the POE. In the latter case, the target concentrations at the POC are back-calculated to ensure that the concentrations at the POE do not exceed the target concentration at the POE. For example, for the protection of the ground water pathway, the POC well may serve as a sentry well for protection of the POE. The calculated target levels for the POC are then compared to measured concentrations. POC locations may be predetermined based on program-specific requirements. Most sites, particularly those involving ground water impacts, will have multiple POC locations.

4.3.4.4 Estimating Point of Compliance Well Concentrations

As a part of the risk evaluation process, it is necessary to designate and monitor appropriate POCs. The POCs, located onsite and/or offsite, are used to provide additional assurance that approved concentrations at a selected POE are not exceeded. Monitoring of POC locations is required, and data obtained are compared with approved RATL concentrations. Monitoring of POC locations must be continued until the concentrations stabilize below approved levels. Concentrations at the POC may also be used to determine the need for additional remedial activities.

4.3.5 Fate and Transport and Exposure Models

Different types of models or equations, uptake equations, risk equations, and fate and transport models, are required to calculate chemical uptake, risk, exposure point concentrations, and target concentrations. Fate and transport models simulate the transfer of chemicals from one media (such as soil) to another (air). They also are used to simulate the movement of chemicals within a given media, such as the transport of chemicals in ground water from a source area to a point of exposure. They allow the estimation of concentrations at points distant from the source. A schematic and the equations for each of these models are presented in Appendix A-5. DEQ has selected the following default fate and transport models:

Indoor Inhalation of Volatile Emissions from Soil and Water: This pathway requires an emission model and an indoor air-mixing model. These models are combined together and included in the Johnson and Ettinger Model (EPA, 2003). The Johnson and Ettinger Model does not include the effects of attenuation by biodegradation, which may be significant for petroleum COI.

Surficial Soil Outdoor Inhalation: This pathway requires an emission model for vapors, an emission model for particulates, and an outdoor air mixing model. The vapor emission model used is based on the volatilization model developed by Jury et al. (1983) for an infinite source, the particulate emission model is the Cowherd model (Cowherd, et al., 1985), and the outdoor air mixing model is based on a simplified form of the Gaussian Dispersion model. These models are presented in Soil Screening Guidance: Technical Background Document (EPA, 1996a).

Leaching to Ground Water: This pathway uses a three-phase equilibrium partitioning equation to convert soil concentrations to leachate concentrations. These leachate concentrations are then used with a dilution attenuation model to mix leachate with regional ground water. Models used are described in Soil Screening Guidance: Technical Background Document (EPA, 1996).

Horizontal Migration in Ground Water: The Domenico steady-state analytical, infinite source model is used to quantify downgradient migration of chemicals (Domenico, 1982, 1990). This model incorporates the processes of advection, sorption, three-dimensional dispersion, and degradation.

Alternative models may be used with prior DEQ approval.

4.3.5.1 Fate and Transport Parameters

Fate and transport parameters are necessary in the models used to estimate exposure point concentrations and compliance point concentrations for indirect pathways such as vapor intrusion and protection of ground water. These parameters characterize the physical site properties such as depth to ground water, soil porosity, and infiltration rate at a site. DEQ has selected the conservative default values listed in Appendix A-2. Justification for these parameters is included in Appendix A-2. For RE a combination of site-specific and default values for these parameters is typically used. However, the value of each parameter used, whether site-specific or default, must be justified based on site-specific conditions. Where fate and transport models other than those selected by DEQ are used, the specific fate and transport parameters required to calculate exposure point concentrations and risk may vary and have specific data collection requirements.

4.3.5.2 Physical and Chemical Properties of the Petroleum Chemicals of Concern

The development of target levels requires the selection of values for the physical and chemical properties of petroleum COIs. Values of these parameters are listed in Appendix A-3. The owner/operator must provide sufficient justification to DEQ to use different values. The use of different values will be allowed only with prior DEQ approval. DEQ will update the data in Appendix A-3 as new information becomes available.

4.3.6 Exposure Assumptions

Risk evaluation requires quantifying the magnitude, frequency and duration of exposure for the receptor populations and exposure pathways selected for analysis. Oral exposures are quantified on a dose per unit body weight basis while inhalation exposure is based on concentration in air. In order to determine receptor and pathway-specific intake estimates, it is necessary to select values for a number of exposure parameters in the equations used to calculate intake. The selection of values for the following parameters is based on an assessment of recommendations in various guidance documents, as well as the open scientific literature. When determining these values, it is often necessary to make assumptions. Details and rationale regarding these assumptions are provided in Appendix A-1. Exposure assumptions for surface water related pathways are incorporated into the toxics criteria for surface water discussed in section 4.6.

Exposure factors describe the physiological and behavioral characteristics of the receptor. These factors include the following:

Water ingestion rate,

Body weight,

Exposure duration for each ROE,

Exposure frequency,

Soil ingestion rate,

Hourly inhalation rates for inhalation of vapors and particulates in outdoor air,

Exposure times for indoor/outdoor inhalation,

Dermal relative absorption factor,

Skin surface area for dermal contact with soil,

Soil-skin adherence factor, and

Oral relative absorption factor.

A list of default exposure factors values selected by DEQ and justification for their choice is presented in Appendix A-1. Site-specific values of exposure factors, other than default values, may be used. However, the responsible party must submit a proposal for the use of alternative values to DEQ for approval prior to their use.

4.4 TOXICITY ASSESSMENT

4.4.1 Chemical-Specific Toxicological Factors

The toxicity of chemicals with carcinogenic adverse health effects is quantified using cancer slope factors (CSF) for oral and dermal routes of exposure, or inhalation unit risk (IUR) for the inhalation route. A CSF is an upper-bound estimate of the probability of a response (developing cancer) per unit intake of a chemical over a lifetime. The IUR is the upper-bound excess cancer risk estimated as a result of continuous exposure to a chemical at a concentration of 1 microgram per cubic meter ($\mu\text{g}/\text{m}^3$) in air.

For chemicals that cause non-carcinogenic health effects, toxicity is typically quantified by reference doses (RfD) for oral and dermal routes of exposure, and reference concentrations (RfC) for the inhalation route of exposure. The RfD is an estimate of a daily oral exposure to the human population (including sensitive subgroups) that is likely to be without risk of adverse health effects during a lifetime. Since RfDs are based on oral exposure, they are modified for use in dermal exposure assessment to take account of differences between gastrointestinal and dermal absorption. The RfC is an estimate of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of adverse health effects over a lifetime.

The primary source of information for toxicity factors for the petroleum chemicals of concern is the U.S. Environmental Protection Agency's (EPA) Regional Screening Levels tables (RSL) (EPA, 2009) found at:

http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm

Toxicity factors selected by DEQ for the petroleum COCs are presented in Appendix A-4.

4.4.2. Carcinogens with a Mutagenic Mode of Action

Current EPA guidance for risk assessment of carcinogens addresses the potential for increased susceptibility to cancer from exposure to carcinogens that occurs early in life (EPA, 2005). When information is available to establish the mode of action of a chemical for early-life and adult exposures, it may be appropriate to develop separate risk estimates for childhood exposure and exposure occurring later in life. When the mode of action cannot be established, risk estimates are based on a lifetime daily average exposure without adjustment. Currently, there is sufficient information to develop separate risk estimates only for chemicals having a mutagenic mode of action.

Specifically, when data indicate a mutagenic mode of action for a chemical, meaning that the chemical interacts directly with DNA, available studies indicate higher cancer risk for a given exposure when it occurs early in life compared to a similar exposure in adulthood. Among the petroleum chemicals of concern, the following carcinogenic chemicals are considered mutagens:

Benzo(a)anthracene

Benzo(a)pyrene

Benzo(b)fluoranthene

Benzo(k)fluoranthene

Chrysene

For these chemicals, the following adjustments are made to risk estimates:

- For exposures between birth and two years of age, a ten-fold adjustment (multiplication factor) is applied. Toxicokinetic and toxicodynamic differences between children and adults are greatest for this age group.

- For exposures occurring from two up to six years of age, a three-fold adjustment is applied.
- For exposures occurring between six and sixteen years, a three-fold adjustment is applied.
- For exposures occurring after 16 years of age, no adjustment is applied.

These adjustments are combined with corresponding age-specific exposure parameters to assess cancer risk. For a standard residential exposure scenario of 30 years, a ten-fold adjustment is made for the first two years, a three-fold adjustment is made for the next fourteen years, and no adjustment is made for the final fourteen years of the exposure period.

The screening levels are based on unrestricted (residential) exposure; therefore they incorporate the adjustments described here. The effect of the adjustments will be a somewhat higher estimates of risk for a given exposure (and thus somewhat lower screening levels) compared to risk estimates without age-specific adjustment. Calculated risk estimates for residential exposure will incorporate these adjustments, but nonresidential risk estimates will not, as they are based on adult exposure.

4.5 RISK CHARACTERIZATION

The process of risk characterization consists of combining the intake estimates developed through the exposure assessment and toxicity information for the petroleum COIs and calculating carcinogenic risk and noncarcinogenic hazard. Calculations are made for each pathway-receptor combination and are summed to calculate a cumulative risk and hazard for each receptor. These risk results are then presented and discussed in a risk summary and are compared to acceptable target risk levels.

Risk and hazard calculations are completed using a standard set of risk equations presented by the Environmental Protection Agency in their User's Guide for Regional Screening Levels (EPA, 2010) and provided in Appendix A-3. When presenting these calculations the estimates should be presented using one significant figure. For example, calculated cancer risks would be expressed as 1E-4 and hazard quotients or hazard indices are expressed as 2, 0.7, or 0.03. However, an additional significant digit should be carried through the supporting calculations, such as when summing risks from multiple petroleum chemicals or pathways, in order to minimize rounding errors.

This risk-based decision-making process specifies the acceptable risk levels for both carcinogenic and non-carcinogenic health effects. For carcinogenic effects, risk is quantified using the individual excess lifetime cancer risk (IELCR) that represents an increase over background in the probability of an individual developing cancer due to exposure to a specific COI through a specific exposure pathway. Since a receptor may be exposed to multiple petroleum chemicals through multiple ROEs, the acceptable risk level should account for the effect of simultaneous exposure to multiple petroleum chemicals and multiple ROEs. Overall site carcinogenic risk is calculated as the sum of the individual chemical risk estimates. The probability of a receptor getting cancer is thus the sum of the probabilities of getting cancer from exposure to each petroleum chemical through each exposure route. In this calculation there is an assumption of independence of action of the individual chemicals. If the carcinogenic actions of different petroleum chemicals are not independent there is the possibility of synergistic interaction in which case risk may be underestimated. However, generally information is generally not available to address this possibility.

For non-carcinogenic effects, risk is quantified using a hazard quotient (HQ) that represents the ratio of the estimated dose of a petroleum chemical for a ROE to the reference or allowable dose. When a receptor is exposed to multiple chemicals and multiple ROEs, individual HQs are added together to estimate the Hazard Index (HI).

For site-specific risk evaluations the following target risk criteria must be satisfied at the point of exposure:

Acceptable Target Risk Level: For combined exposure to all carcinogens and routes of exposure, IELCR must be less than or equal to 1×10^{-5} for a receptor at a reasonable maximum exposure.

Acceptable HI: The summation of HQs for all petroleum chemicals that have non-carcinogenic health effects and routes of exposure must be less than or equal to 1.

The target risk level and HI must be met for each current and potential future receptor at the site. If the initial calculated HI exceeds 1 further evaluation, including analysis of mode of action and target organ for each petroleum chemical can be completed. If this analysis indicates sufficient independence of target organs and mode of action for different chemicals, it may be acceptable to present separate HQs, and/or one or more HI for subsets of the chemicals. This kind of analysis should be performed by a toxicologist.

In addition to the target risk levels, DEQ requires that maximum contaminant levels (MCLs), or comparable risk-based values for ground water ingestion, be met at the POE when there is a high probability of ground water use. When there is a low probability of ground water use for drinking water, alternate risk-based groundwater target concentrations, based on the other potentially complete exposure pathways identified for the site, must be met at the POE. Similarly, for impacts to surface water bodies, calculated target concentrations must be met.

Included in the risk summary is an analysis and discussion of the sources of uncertainty so that the risk estimates can be placed in perspective. The uncertainty analysis can be qualitative or quantitative in nature. It is more important during the analysis to identify the key site-related parameters and assumptions in the site conceptual model that contribute the most to the uncertainty than to precisely quantify the degree of uncertainty (EPA, 1989). It is typically the case that there is insufficient information available at a given site to be able to reliably quantify the uncertainty in a given risk estimate, such as through conducting a probabilistic risk assessment or sensitivity analysis. The typical sources of uncertainty that are included in the analysis include the petroleum COIs selected and their estimated site concentrations, the toxicity values used, the fate and transport models used to estimate exposure point concentrations, the exposure parameter values used in the exposure assessment, and the summing of risks from multiple pathways or petroleum chemicals.

As described in the Risk Characterization section 4.5 , if the calculated risk or hazard for all petroleum COIs and complete routes of exposure (except ingestion of water) for identified potential receptors exceeds the Acceptable Target Risk or Hazard Levels and corrective action is required, then risk-based target concentrations (RATLs) to achieve these targets should be calculated. The procedure used to calculate RATLs requires chemical-specific toxicological factors, receptor-specific exposure factors, fate and transport parameters, physical and chemical properties of the petroleum COIs, and mathematical models. All of these factors, properties, and models are typically the same as used for earlier calculations of risk.

Target concentrations should be estimated using an allocated risk process apportioning the acceptable target cumulative risk and HI to each chemical-pathway combination. The primary goal is to develop target concentrations in all media such that the acceptable target risk and hazard levels are met. No unique way to apportion the cumulative risk exists. To develop RATL concentrations, the default option selected by DEQ apportions cumulative risk and HI equally among all contributing petroleum chemical-pathway combinations such that those petroleum chemicals which contribute the greatest proportion of the total risk have the most stringent cleanup criteria. This methodology is described in detail with examples in Appendix A-4 and is implemented in the computational software developed to complement this guidance.

If a petroleum COI has toxicity based on both carcinogenic and non-carcinogenic effects, the applicable RATL for that chemical should be the lower of the two calculated allowable concentrations.

Site-specific considerations may result in a owner/operator choosing to utilize a different method for calculating target concentrations. For example, at a site having volatile and semi-volatile petroleum COIs contributing to the cumulative risk, the owner/operator may choose a technology that specifically reduces the volatile chemical's concentrations but marginally reduces the concentration of the semi-volatile chemical. A different responsible party may choose to significantly reduce the concentration of the semi-volatile chemical and marginally reduce the concentration of the volatile chemical. The two strategies will result in different cleanup levels for each chemical; however, both will be acceptable provided cumulative risk meets the acceptable target risk criteria.

4.6.1 DEVELOPING RATL CONCENTRATIONS FOR GROUND WATER AND SURFACE WATER PROTECTION

4.6.1.1 Ground Water Protection

For ground water and surface water protection, target concentrations are calculated using a somewhat different procedure described below.

The RATL concentrations for ground water ingestion are equivalent to the federal MCLs or a risk-based calculated equivalent. MCLs are health-protective target concentrations promulgated by the EPA and adopted by the state of Idaho for the protection of drinking water and specified ground water resources. For petroleum COIs with a MCL, the RATL concentrations for ground water ingestion are equal to the MCL. For petroleum COIs without MCLs, the risk-based equivalent levels are calculated using the following input values and equations:

A target risk level of 1×10^{-6} for carcinogenic effects and an HQ of 1 for non-carcinogenic effects,

The residential exposure factors in Appendix A-1,

The toxicity values in Appendix A-4, and

Risk equations for the direct ingestion of water.

Calculations are made for child, and age-adjusted adult residential receptors and the lowest value is selected.

The RATL concentrations will apply at the POE. The POE will be the downgradient property boundary, as it existed when the release occurred, or the nearest downgradient location where a well exists or could be reasonably placed, whichever is closer to the source. Depending on site-specific conditions it is also possible to have multiple points of exposure.

4.6.1.2 Surface Water Protection

Potential impacts to streams and other surface waterbodies from a petroleum release must be evaluated and surface water quality must be protected as per IDAPA 58.01.02 (Water Quality Standards and Wastewater Treatment Requirements). The primary receptors and routes of exposure for potentially impacted surface waters evaluated in the risk evaluation process are described in Sections 4.6.1.2.1. Other routes of exposure, such as contact with contaminated sediments or overland flow discharge, are evaluated on a case-by-case basis.

This section describes the evaluation of potential impacts to surface water via discharge of impacted ground water to a surface waterbody. A schematic illustrating this exposure pathway is shown in Figure 3. This figure shows the relevant compliance and exposure locations and associated concentrations. Within the risk evaluation process, protection of surface waterbodies requires the responsible party to determine or calculate the applicable surface water standards at the point where ground water discharges into a surface waterbody (C_{swpoe}). Once the appropriate surface water standard is determined, compliance with the standard may be achieved in a number of ways. These include measuring surface water concentrations at the point of ground water discharge, measuring ground water concentrations at the point of discharge into the surface waterbody, or determining appropriate alternate concentrations in other media and at POC locations. Alternate concentrations (or RATLs) and POC locations can include:

- Source area soils (C_{soil}), or
- Compliance points in ground water at different distances between the surface water and the source (C_{cw}) other than the point where ground water discharges into the surface waterbody.

The selection of these alternate locations may be most appropriate for those sites where contamination has not yet reached a surface waterbody.

The owner/operator can back-calculate allowable soil (C_{soil}) and compliance well concentrations (C_{cw}) using the concept of dilution attenuation factors (DAFs). Specific equations, combining the Summer's mixing model and the Domenico analytical ground water transport model, are presented in Appendix A-5. If measured concentration(s) at the soil source or the compliance well exceeds corresponding allowable concentrations, cleanup to RATL concentrations or performance of a more detailed, site-specific evaluation to refine DAFs are options.

4.6.1.2.1 Surface Water Quality Standards

The allowable concentration at the point of ground water discharge into the surface water (C_{swpoe}), or the surface water quality standard, depends on the beneficial use designation of the surface waterbody as per IDAPA 58.01.02.100 and criteria assigned to protect those beneficial uses (IDAPA 58.01.02.200-250).

Beneficial uses include:

Aquatic life: Cold water, salmonid spawning, seasonal cold water, warm water, or modified.

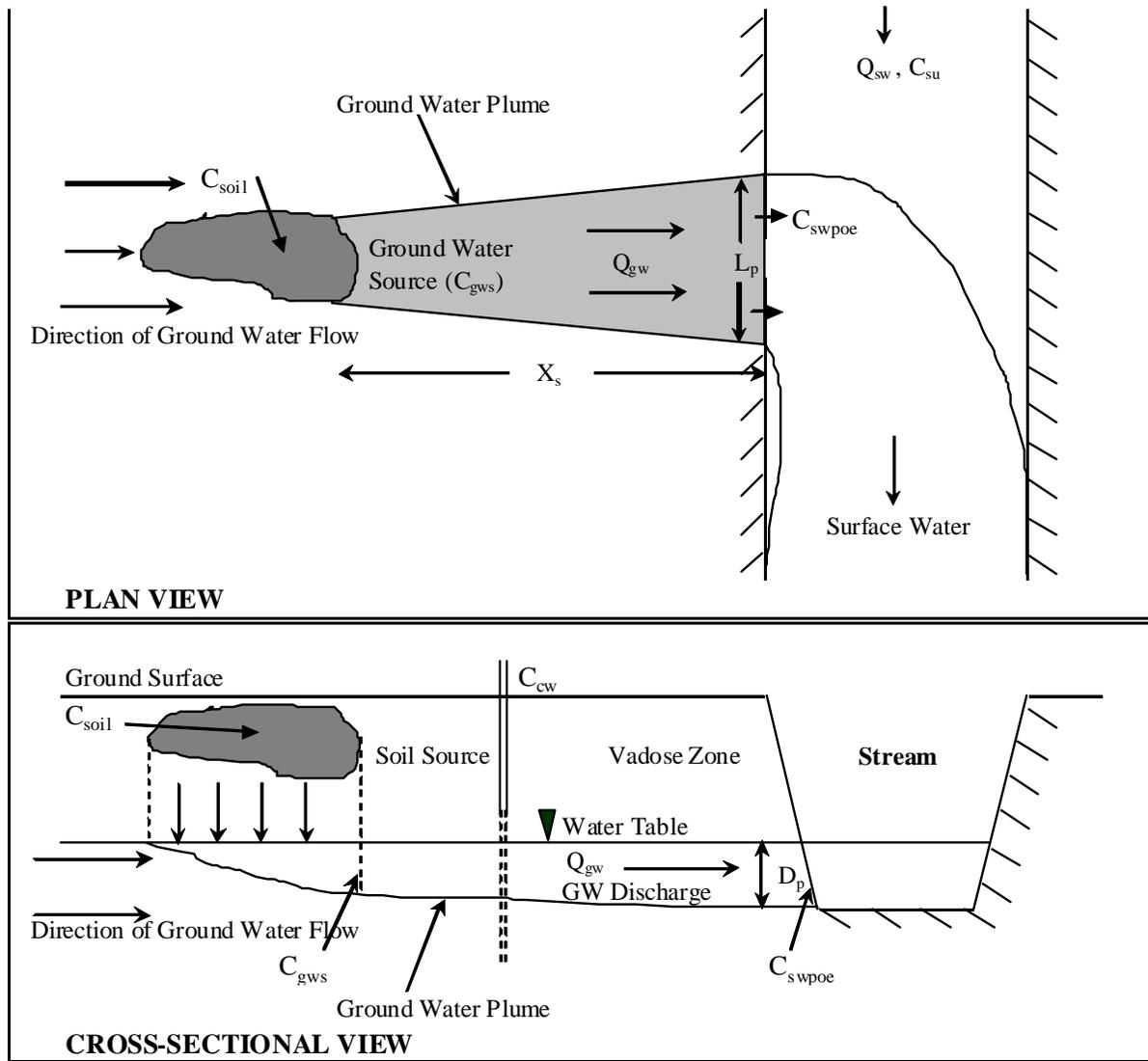
Recreation: Primary contact or secondary contact.

Water supply: Domestic, agricultural, or industrial.

Each beneficial use has associated numerical and narrative criteria. Numerical criteria are specified values that are not to be exceeded. For narrative criteria, amounts of the pollutant are not specified, but must be low enough to ensure no impacts to the beneficial use.

The allowable concentrations for certain toxic substances associated with these beneficial uses are tabulated in Table 3. Criteria B1 and B2 apply to any aquatic life and Criteria D2 applies to recreation use , while the water and organisms human health criteria (D1) only apply to domestic water supply uses.

Figure 3. Schematic of Leachate Migration from the Soil Source to the Stream



Explanation of Symbols

- Q_{sw} = Stream flow upstream of the point of ground water discharge
- C_{su} = Concentration upstream of the ground water discharge
- Q_{gw} = Impacted ground water discharge into the stream
- C_{sw} = Allowable downstream concentration after uniform mixing
- C_{swpoe} = Allowable concentration at the point of ground water discharge to the stream
- C_{gws} = Allowable concentration in the ground water at the edge of the soil source
- C_{soil} = Allowable soil concentration at the source protective of the stream
- C_{cw} = Allowable soil concentration in ground water at different distances between the stream and the source
- L_p = Width of ground water plume discharging to the stream
- D_p = Thickness of ground water plume discharging to the stream
- X_s = Distance from the downgradient edge of the ground water source to the stream

Table 3. Surface Water Toxics Criteria for Petroleum Chemicals of Interest.

	Fresh Water (B)		Human Health (D) (1×10^{-6} Risk for Carcinogens) for Consumption of:	
	Criterion Maximum Concentration (B1)	Criterion Continuous Concentration (B2)	Water and Organisms (D1)	Organisms Only (D2)
Chemical of Concern	[ug/L]	[ug/L]	[ug/L]	[ug/L]
Benzene			1.2	71
Toluene			6800	200000
Ethylbenzene			3100	29000
Total Xylenes				
Naphthalene				
MTBE				
1,2-Dichloroethane			0.38	99
Ethylene Dibromide				
Acenaphthene				
Anthracene			9600	110000
Benzo(a)anthracene			0.0028	0.031
Benzo(a)pyrene			0.0028	0.031
Benzo(b)fluoranthene			0.0028	0.031
Benzo(k)fluoranthene			0.0028	0.031
Chrysene			0.0028	0.031
Fluoranthene			300	370
Fluorene			1300	14000
Pyrene			960	11000

4.6.2. DETERMINATION OF APPLICABLE RISK BASED LEVELS

The calculated allowable RATL concentrations for protection of surface and/or ground water and those calculated for other potentially complete exposure pathways are compared to determine which media specific concentrations will guide the cleanup. Typically the lower of these concentrations will be selected.

Using ground water as an example, target POE concentrations will be based on the most limiting concentrations determined from evaluation of complete or potentially complete pathways other than ground water ingestion. These pathways may include indoor inhalation of vapors volatilized from ground water, ground water impacts to surface water, impacts to deeper ground water systems with the potential for use as drinking water supplies as well as incidental ingestion and dermal exposure from irrigation water. Also included is potential impairment of other beneficial uses of groundwater such as for agricultural or industrial water supplies. The applicable POE will be based on the location of the plume (on-site vs. off-site) and which pathway(s) and receptors are limiting with respect to risk and allowable groundwater concentration. In many cases, particularly if a plume has migrated off-site, there may be multiple POE and pathways that will need to be considered.

For example, a petroleum-sourced VOC plume may have migrated off-site into a residential area and has the potential to discharge to a downgradient stream. Source area groundwater concentrations on-site must be controlled such that concentrations at the POE where groundwater discharges to the stream meets applicable criteria. In addition, unless vapor intrusion has been separately addressed such as through the use of soil vapor, residential vapor intrusion criteria in ground water would need to be met at the downgradient boundary of the source property and commercial criteria for on-site POE.

4.7 DELIVERABLES

The primary deliverables associated with conducting a site-specific risk evaluation typically include an optional workplan for data collection and evaluation, a data collection report, and a risk evaluation report. Only the risk evaluation report is required. In many cases the results of a data collection effort are combined with the risk evaluation report. If the results of the risk evaluation report indicate the need for corrective action, a corrective action plan must also be developed. The contents of corrective action plans are discussed in Section 5. This section describes the contents of a workplan.

4.7.1 WORKPLAN

A workplan may be desirable where extensive data collection activities or significant departures from default exposure assumptions or modeling are being proposed.

As appropriate, a work plan to fill identified data gaps may be prepared and implemented with the concurrence of DEQ. The amount of detail to be included in the work plan will vary among sites. At sites where a considerable amount of data has already been collected, the work plan may be a brief letter indicating activities to be performed to fill in the data gaps. For a complex or large site, a very detailed work plan, including the SCM, data collection methodology, analysis methods, a data quality assurance project plan, and a health and safety plan may need to be developed.

The risk evaluation work plan should address each item discussed in Sections 4.7.1.1 through 4.7.1.11 as appropriate to the purpose and goals.

4.7.1.1 Purpose and Goals

The purpose and goals of the workplan should be clearly stated. If the purpose is to fill data gaps a listing and description of the data gaps should be provided along with an explanation as to why they constitute data gaps and how the work proposed will fill those gaps.

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If the purpose of the workplan is to propose use of alternative models, exposure factors, physical and chemical properties or toxicity factors or methods of calculating remedial target concentrations a rationale should be provided as to why the alternatives proposed are needed. A short description of the scope and nature of the work proposed should be provided.

4.7.1.2 Site Background

This portion of the work plan may refer to documents previously submitted to DEQ; it is not necessary to repeat the entire site background description. Reference should be made to document(s) that contain a comprehensive chronology of site investigations.

4.7.1.3 Site Conceptual Model

A concise summary of the existing site conceptual model (SCM) should be provided. In those cases where the goal of the workplan is to revise a previously completed risk evaluation a SCM already exists that can be referenced. If validation to or a revision of a previous SCM is necessary those aspects of the current SCM that are the target of the workplan should be described. Refer to Section 4.1 for the content of the SCM.

4.7.1.4 Exposure Factors

If alternate exposure factors values are proposed in the work plan these factors must be justified and acceptable to DEQ. The default exposure factor values are listed in Appendix A-1.

4.7.1.5 Physical and Chemical Properties

Responsible parties should use the default physical and chemical properties for the petroleum COIs as listed in Appendix A-3.

4.7.1.6 Toxicity

The Petro REM rule specifies that toxicity values for petroleum chemicals listed in Appendix A-4 be used in the risk evaluation

Comment [d1]: Our defaults will now come from the RSL tables so the deleted language would not provide a benefit.

Deleted: Alternate physical and chemical properties for listed COIs may be proposed, but must be justified and accepted by DEQ prior to use. If a COI is not listed, physical and chemical properties of the COI and data source should be provided to DEQ for review.¶

Comment [d2]: Agree. Modify language and reinsert.

Deleted: June 29, 2010

If additional chemicals need to be included in the risk evaluation, as provided in Section 100.02 of the Petro REM rule, their physical chemical properties and toxicity values should be obtained from the EPA Regional Screening Level (RSL) website (EPA, 2011).

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Deleted: proposed to DEQ for review and approval

Comment [MAB3]: Alternative properties/factors, if necessary, should come from RSL tables

4.7.1.7 Fate and Transport Models

If alternative models are being proposed, the work plan should include reasons for using alternative models, demonstrate that the proposed models will better simulate site-specific conditions, and that the sufficient site-specific data are available or will be collected to justify the use of the proposed model. Alternative models must be approved by DEQ prior to use.

4.7.1.8 Fate and Transport Parameters

Data collection may be proposed to collect site-specific values in lieu of using DEQ default values for fate and transport parameters (listed in Appendix A-2) used in models for the risk evaluation. The parameters for which values are to be obtained should be specified and the methodology used to obtain those values described.

DEQ accepts the use of chemical-specific biological decay rates or attenuation factors in the fate and transport models. Use of decay rates in a risk evaluation must use values supported by site-specific information. Refer to Appendices A-7 and A-8 for data necessary to demonstrate occurrence of natural attenuation and methods to calculate decay rates. Examples of this type of information include, but are not limited to:

Consistent stable or decreasing concentration (above the RUSLs) trends in properly located and constructed monitoring wells, and

Measurements of natural attenuation parameters that provide evidence of biodegradation.

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4.7.1.9 Calculating RATL Concentrations

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The process of calculating target concentrations (RATLs) is described in Section 4.6 and Appendix A-6. If a method of apportioning risk and calculating RATLs different than the DEQ default method is desired the proposed methodology and rationale for the choice should be described.

4.7.1.10 Methodology and Quality Control

Workplans in support of data collection efforts should describe the methodology that will be used to obtain the data and provide a clear description of the level of data quality required to meet the stated objectives, and how this data quality will be achieved and ensured.

4.7.1.11 Schedule and Deliverables

The optional work plan should include an overall project schedule and deliverables that will be submitted to DEQ. The schedule should include any agency meetings necessary during workplan implementation.

4.7.2 IMPLEMENTING THE WORK PLAN

Upon receipt of a work plan approval, the owner/operator should implement the work plan as per the schedule in the work plan. In case there are delays, it is the responsible party's duty to inform DEQ of the delay and revised schedule. If there were deviations in the work performed from that specified in the approved workplan DEQ should be notified of the deviations and their impact on the goals and purposes of the workplan.

Upon completion of work specified in the workplan, the owner/operator should document the results and submit them to DEQ. If the purpose of the workplan included data collection the results of the data collection can be summarized in a separate data collection report or incorporated into a revised risk evaluation report.

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4.7.3 RISK EVALUATION REPORT

The risk evaluation for a site must be clearly and concisely documented and submitted to DEQ for review. An example outline of a risk evaluation report is presented in Appendix A-10.

SECTION 5 DEVELOPING AND IMPLEMENTING CORRECTIVE ACTION PLANS

Development and implementation of a corrective action plan (CAP) may be necessary if, after the Screening Level evaluation or site-specific risk evaluation, concentrations exceed screening levels or an unacceptable risk is identified and the owner/operator has chosen not to perform additional evaluation. The owner/operator must then develop cleanup criteria (also referred to as remediation standards) and create a CAP to achieve those standards or to ensure that the remaining risk is acceptable. The risk management strategy described in the CAP depends on the results of the risk evaluation (which pathways, petroleum chemicals, and media are responsible for the unacceptable risk) and other circumstances unique to the site.

5.1 CONTENTS OF A CORRECTIVE ACTION PLAN

The CAP, as required in the Rule, should include:

A description of remediation standards selected, points of exposure, and points of compliance,

A description of the remedial strategy and actions to be taken to achieve the remediation standards,

Current and future land use and onsite and offsite use of ground water and surface water,

Activity and use limitations that will be required as part of the remedial strategy and the associated environmental covenants.

Estimated timeline for completion of remedial actions,

The monitoring plan to gauge effectiveness of the remedial strategy, and

A description of practical quantitation limits and background concentrations as they apply to the remediation.

Additional elements that should also be a part of the plan include:

A brief site description,

A brief description of the risk evaluation approved by DEQ, including assumptions used for receptors and land use, and a list of approved cleanup levels for specific pathways, media, chemicals, and specific areas of the site (if applicable),

A clear description of reasons a CAP is needed,

An identification of the area(s) to be managed under the CAP,

A description of the strategy selected to achieve cleanup goals, including a comparison and evaluation of remedial alternatives considered in development of the overall strategy. A rationale for the strategy selected should be presented. Any data collected in support of or to determine the feasibility of a particular remedial measure such as pilot testing, should be presented, and

A reporting schedule to document progress of the corrective action.

5.2 IMPLEMENTING A CORRECTIVE ACTION PLAN

The CAP should not be implemented until approved by DEQ. Within 30 days of receiving a corrective action plan DEQ must provide an approval, approval with modifications, or a rejection (specifying reasons for the rejection) in writing. Provisions are made in the IDAPA 58.01.24.200.04 for extending this timeframe.

The implementation of interim corrective action measures however may take place, as provided in IDAPA 58.01.02.852.06.c. Owner/operators may, in the interest of minimizing environmental contamination and promoting more effective cleanup, begin cleanup of soil, surface water, and ground water before the corrective action plan is approved provided that they fulfill certain conditions including:

Notification of the Department of their intention to begin cleanup;

Compliance with any conditions imposed by the Department, including halting cleanup or mitigating adverse consequences from cleanup activities; and

Incorporation of these self-initiated cleanup measures in the corrective action plan that is submitted to the Department for approval.

Typical interim corrective actions include excavating and disposing contaminated soil, removing free product, extracting soil vapor, and pumping and treating ground water.

Upon approval of the CAP, the owner/operator must implement the plan according to the proposed schedule. All performance data should be submitted to DEQ in a timely manner. This data should be carefully evaluated by both the owner/operator and DEQ to determine if the CAP is progressing as anticipated. Major deviations in schedule or plan implementation should be communicated to DEQ for review and approval well in advance of proposed implementation, along with recommended modifications if necessary. The specific modifications that may be needed will vary from site to site.

When the CAP has been successfully implemented, the owner/operator should document these conditions in a completion report along with a petition to DEQ for site closure.

SECTION 6 ACTIVITY AND USE LIMITATIONS

An activity and use limitation (AUL) is a restriction or obligation, with respect to real property, that is created by an Environmental Covenant pursuant to the Uniform Environment Covenants Act (UECA), Chapter 30, Title 55, Idaho Code, UECA is available at:

<http://legislature.idaho.gov/idstat/Title55/T55CH30.htm>

The purpose of AULs is to reduce the potential for exposure to contaminants at a release site. AULs are also commonly referred to as “institutional controls.” AULs are typically proposed to DEQ for approval through the risk evaluation process. Non-remedial land use restrictions (e.g., local zoning ordinances) may reinforce the sustainability of AULs however they are not considered sufficient by themselves. These types of non-remedial land use restrictions, such as zoning ordinances, may change or be removed absent DEQ approval and therefore are not approved by DEQ as part of a CAP. However non-remedial land use restrictions may be relevant to evaluating current and reasonably likely future use and exposure scenarios at a site.

6.1 ENVIRONMENTAL COVENANTS

Owner/operators may propose an Environmental Covenant as part of the CAP which will include the activity and use limitation language. Any proposed Environmental Covenant must be consistent with UECA. Each proposed Environmental Covenant is reviewed and evaluated on a site specific basis.

Following is a *non-exclusive* list of the types of activity and use limitations that may be included in an Environmental Covenant:

Restrictions on Water Use:

Prohibit use

Limit use

Monitor use

Reporting use

Operation and maintenance procedures for physical controls and devices

Prohibit well installation and operation Abandon an existing well.

Restrictions on Land Use:

Prohibit, or require DEQ approval for, disturbance of soil, cap, or vegetation

Limit activities and land use

Limit structures and buildings.

Actions Regarding Access:

Right of Access necessary to implement the activity and use limitation

Limit or deny public access.

Obligations to perform certain actions in order to maintain the effectiveness of an approved corrective action. For example, this may involve the need to do periodic inspections and maintenance in order to ensure that a cover or barrier retains its primary function. In this case there might be a specific reference in the Environmental Covenant to an Operations and Maintenance Plan, developed as part of the corrective action.

DEQ has an Environmental Covenant that responsible parties can use when proposing activity and use limitations as part of a CAP. The DEQ website includes a copy of the latest Environmental Covenant template.

6.2. SPECIFIC APPLICATION OF ACTIVITY AND USE LIMITATIONS AT PETROLEUM RELEASE SITES

Section 600.01 of the Rule outlines the circumstances under which AULs will be included as part of a corrective action plan. These include:

Where the assumed onsite land use for the purpose of the risk evaluation is not residential and either the maximum media concentrations exceed the screening levels or the calculated risk for a residential receptor is unacceptable

Where off-site ground water concentrations exceed residential use screening levels or risk-based concentrations, and

Where DEQ determines, based on the proposed CAP, that such AULs are required to assure the continued protection of human health and the environment or the integrity of the cleanup action.

6.3 USE OF ACTIVITY AND USE LIMITATIONSS AT IMPACTED NEIGHBORING PROPERTIES

Implementability and enforceability issues become more complicated when an owner/operator proposes use of AULs on impacted neighboring properties. It is the owner/operators's obligation to negotiate language and reach agreement with both the impacted property owner and DEQ.

6.4 NON-REMEDIAL LAND USE RESTRICTIONS

Non-remedial land use restrictions (e.g., local zoning ordinances) may reinforce the sustainability of AULs however they are not considered sufficient by themselves. These types of non-remedial land use restrictions, typically implemented by other governmental agencies, may change or be removed absent DEQ approval and therefore are not approved by DEQ as part of a CAP. The presence of such non-remedial restrictions may be relevant when determining the current and likely future uses of impacted properties.

APPENDIX A-1 DEFAULT EXPOSURE FACTORS

Risk assessment requires quantifying the magnitude, frequency and duration of exposure for the receptor populations and exposure pathways selected for analysis. In order to determine pathway-specific intake estimates, it is necessary to select values for a number of variables in the equations used to calculate intake. The selection of values for the following variables is based on an assessment of recommendations in various guidance documents, as well as the open scientific literature. When determining these values, it is often necessary to make assumptions, and in these cases the rationale for the assumption is provided.

AVERAGING TIME

The period over which exposure to chemicals is averaged depends on the type of toxic effect being assessed. For chronic exposure to noncarcinogenic toxicants, intakes are averaged over the period of exposure, so the averaging time is equal to the exposure duration. Intakes of carcinogens are calculated by prorating the total cumulative dose over a lifetime. The different approach is based on the idea that for carcinogens a higher dose received over a shorter period is equivalent to a corresponding lower dose spread over a lifetime. The averaging time selected for carcinogens, 70 years, is based on the U.S. Environmental Protection Agency's (EPA) *Risk Assessment Guidance for Superfund* (EPA, 1989).

BODY WEIGHT

It is appropriate to use an average value for this parameter. The default body weight for adult receptors is 70 kilograms (kg), and represents the EPA standard default exposure factor (EPA, 1991). There is evidence presented in the *Exposure Factors Handbook* (EPA, 1997) that Americans are getting slightly heavier, so currently the actual average adult body weight is 72 kg. However, the derivation of cancer slope factors assumes a body weight of 70 kg, so it is more appropriate to use this value. Use of 70 kg rather than 72 kg results in a slightly more conservative assessment. The child body weight is 15 kg, and is the mean value for children aged six months to six years (EPA, 1997). It is also a standard default value in EPA's 1991 *Risk Assessment Guidance for Superfund*.

EXPOSURE DURATION

The residential exposure duration is the EPA standard default of 30 years (EPA, 1991). This period is divided into 6 years of exposure as a child and 24 years as an adult. These time periods are used, in combination with other age group-specific exposure parameters to assess exposure to carcinogenic chemicals. Noncarcinogenic chemical exposure is conservatively assessed using the child receptor and an exposure duration of 6 years. For the non-residential adult receptor, the exposure duration is 6.6 years. This is a median value from the *Exposure Factors Handbook* (EPA, 1997). The exposure duration for the construction worker is 30 days (0.08 year); this is assumed to be a conservative estimate of exposure for most construction projects.

EXPOSURE FREQUENCY

The exposure frequency for residential receptors is 350 days per year for all exposure routes that do not involve direct contact with soil. This exposure frequency is the EPA standard default exposure factor (EPA, 1991). The non-residential scenario assumes an exposure frequency of 250 days per year. This is the EPA standard default for commercial or industrial scenarios (EPA, 1991), and so was considered appropriate for all non-residential receptors except for construction workers. For the construction worker scenario, the exposure frequency is 30 days per year.

Exposure Frequency for Direct Contact with Soil

For exposure routes involving direct contact with soil, including soil ingestion, dermal exposure, and vapor and particulate inhalation it is assumed that receptors have contact with soil primarily in warmer months, when the ground is not frozen or snow covered. For this reason, an exposure frequency of 270 days per year is used for these exposure routes for the residential scenario and 180 days per year for the non-residential scenario. The direct contact exposure frequency for construction workers is 30 days per year.

SOIL INGESTION RATE

The soil ingestion rate for residential child and adult receptors is 200 milligrams per day (mg/day) and 100 mg/day, respectively. These values were taken from EPA's *Risk Assessment Guidance for Superfund* (1991). Although both the *Risk Assessment Guidance for Superfund* (EPA, 1991) and the *Exposure Factors Handbook* (EPA, 1997) recommend a soil ingestion rate of 50 mg/day for workers other than construction workers, it was decided to use a value of 100 mg/day to adequately address the potential soil exposures encountered by all non-residential adult receptors.

For example, a value of 50 mg/day might be appropriate for office workers, but it would not adequately protect groundskeepers. The construction worker soil ingestion rate is 330 mg/kg. This value is based on the 95th percentile for adult soil intake rates reported in a soil ingestion mass-balance study (Stanek et al., 1997), cited in EPA (2002).

WATER INGESTION RATE

The daily water ingestion rate used for children is 1.5 liters per day (L/day). This is the 90th percentile value for children in the 3 to 5 year age group and the 95th percentile value for all children aged 1 through 10 years (EPA, 1997). The residential adult receptor ingestion rate is 2 L/day, and the non-residential adult ingestion rate is 1 L/day. Both of these values are EPA standard default exposure factors (EPA, 1991).

EXPOSURE TIME FOR OUTDOOR INHALATION

Construction workers are assumed to spend 10 hours per day outdoors, as construction workers often work 10 hour days.

DERMAL RELATIVE ABSORPTION FACTOR

The dermal relative absorption factor values are based primarily on recommendations contained in the EPA *Risk Assessment Guidance for Superfund, Part E, Supplemental Guidance for Dermal Risk Assessment* (EPA, 2007). The EPA recommends an absorption factor of 0.13 for benzo(a)pyrene and other polynuclear aromatic hydrocarbons (PAHs) and zero for volatile organic compounds (VOCs).

SOIL-TO-SKIN ADHERENCE FACTOR

The soil-to-skin adherence factor values are derived from recommendations from an analysis of soil adherence study data by the USEPA (EPA, 2007). This analysis calculated body part weighted adherence factor values using studies involving upper end activities for soil-skin adherence and median values of body surface area.

SKIN SURFACE AREA FOR DERMAL CONTACT WITH SOIL

Skin surface areas for dermal soil contact are based on residential and industrial reasonable maximum exposure recommended values contained in EPA *Risk Assessment Guidance for Superfund, Part E, Supplemental Guidance for Dermal Risk Assessment* (EPA, 2007).

EXPOSURE TO MUTAGENIC CARCINOGENS

Exposure to these chemicals carries greater risk when it occurs early in life. Therefore, the age at which exposure occurs must be considered for residential receptors. For these receptors, the 30-year exposure duration is divided into four periods: exposures occurring between the ages of 0-2 years, 2-6 years, 6-16 years, and 16-30 years (EPA, 2005).

Different multipliers are incorporated for these time periods so that early-life exposure is weighted more heavily. The 0-2 year and 2-6 year exposure periods utilize the child-specific values for several exposure parameters: body weight, soil ingestion rate, soil-to-skin adherence factor, and skin surface area for dermal contact. The corresponding adult-specific values are used for the 6-16 year and 16-30 year exposure periods.

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Default Exposure Factors

EXPOSURE PARAMETER	SYMBOL	UNITS	DEFAULT VALUE	REFERENCE
Averaging Time - Carcinogen	ATc	years	70	HHEM
Averaging Time - Noncarcinogen (equals exposure duration)	ATnc	years	Receptor dependent = ED	HHEM
Body Weight (BW)				
Child	BWc	kg	15	EFH
Adult	BWa	kg	70	SDEF
Exposure Duration (ED)				
Resident (child)	EDc	years	6	PJ
Resident (adult)	EDa	years	24	PJ
Nonresidential Worker	ED	years	6.6	EFH
Construction Worker	ED	years	1	PJ
Exposure Frequency (EF)				
Resident (child)	EFc	days/yr	350	SDEF
Resident (adult)	EFa	days/yr	350	SDEF
Nonresidential Worker	EF	days/yr	250	SDEF
Construction Worker	EF	days/yr	30	SDEF
Exposure Frequency for Direct Contact Pathways (EF)				
Resident (adult)	EFd-a	days/yr	270	PJ
Resident (child)	EFd-c	days/yr	270	PJ
Nonresidential Worker	EFd	days/yr	180	PJ
Construction Worker	EFd	days/yr	30	PJ
Soil Ingestion Rate (IR)				
Resident (child)	IR s-c	mg/day	200	EFH
Resident (adult)	IR s-a	mg/day	100	EFH
Nonresidential Worker	IR s	mg/day	100	EFH
Construction Worker	IR s	mg/day	330	EPA, 2002
Daily Water Ingestion Rate (IRW)				
Resident (child)	IRw-c	L/day	1.5	EFH
Resident (adult)	IRw-a	L/day	2	SDEF
Nonresidential Worker	IRw	L/day	1	SDEF
Exposure Time for Inhalation (ET)				
Resident (child)	ETo-c	hr/day	2 (24)	PJ
Resident (adult)	ETo-a	hr/day	2 (24)	PJ
Nonresidential Worker	ETo	hr/day	6 (8)	PJ
Construction Worker (outdoor only)	ETo	hr/day	10	PJ
Oral Relative Absorption Factor (RAF)	RAFo	---	Assume 100%	RAGS, Part E. Exhibit 4-1
Dermal Relative Absorption Factor (RAFd)				
Volatiles	RAFd	---	0	RAGS, Part E
Benzo(a)Pyrene and PAHs	RAFd	---	0.13	RAGS, Part E

EXPOSURE PARAMETER	SYMBOL	UNITS	DEFAULT VALUE	REFERENCE
Soil-to-Skin Adherence Factor (M)				
Residential (child)	Mc	mg/cm ²	0.2	RAGS, Part E
Residential (adult)	Ma	mg/cm ²	0.07	RAGS, Part E
Nonresidential Worker	M	mg/cm ²	0.2	RAGS, Part E
Construction Worker	M	mg/cm ²	0.1	RAGS, Part E
Skin Surface Area for Dermal Contact with Soil (SA)				
Child Receptors	SAC	cm ² /d	2800	RAGS, Part E
Adult Receptors	SAa	cm ² /d	5700	RAGS, Part E
Nonresidential Worker Receptors	SA	cm ² /d	3300	RAGS, Part E
Construction Worker Receptors	SA	cm ² /d	3300	RAGS, Part E

Note: Exposure factors for the age-adjusted resident are calculated from the values listed for child and adult receptors using the equations in Appendix A-5.

Reference Abbreviations

EFH – EPA Exposure Factors Handbook

HHEM – Risk Assessment Guidance for Superfund (RAGS), Volume I, Human Health Evaluation Manual

RAGS, Part E – EPA RAGS Volume I: HHEM, Part E, Supplemental Guidance for Dermal Risk Assessment

PJ – Professional Judgment

SDEF – EPA Standard Default Exposure Factors

APPENDIX A-2: DEFAULT FATE AND TRANSPORT PARAMETER VALUES

INTRODUCTION

Several routes of exposure evaluated in the *Idaho Risk Evaluation Manual* (REM) involve pathways where there is the transfer of chemicals across media. These pathways include inhalation of volatiles from soil or ground water in indoor air, ingestion of ground water containing chemicals leached from soil, and inhalation of volatiles and particulates from surficial soil. Models are used to simulate these cross-media transfer processes, estimate exposure point concentrations, and calculate target levels. This appendix describes the models and selection criteria for the default fate and transport parameter values used to develop the Idaho default target levels and to some degree the remedial action target levels. A list of the parameter values selected is presented in Table 3-2 of the REM.

SOIL PROPERTIES

Unsaturated Zone

Generic unsaturated zone soil properties were based on an assumed sandy loam soil textural class. Nielson and Rodgers (1990) and Hers (2002) present data on average soil physical and hydraulic properties for 12 Natural Resources Conservation Service soil textural classes. Data obtained from these compilations include mean particle diameter, total porosity, saturated moisture content, residual moisture content, van Genuchten parameters describing the shape of the moisture characteristic curve, and saturated hydraulic conductivity. Bulk density was calculated from total porosity. Soil vapor permeability was calculated using van Genuchten equations described in the U.S. Environmental Protection Agency's (EPA) *User's Guide for Evaluating Subsurface Vapor Intrusion into Buildings* (EPA, 2003), the hydraulic properties of the sandy loam soil noted above, and average moisture content conditions. Derivation of the average moisture contents is described below.

Infiltration rates for high and low precipitation areas of Idaho were developed and the value for high precipitation areas is used as the Idaho default target level value. The high precipitation area annual infiltration rate of 25 centimeters is based on field studies and water balance calculations done in northern Idaho on the Rathdrum Prairie (Hammel et al., 1995). This value represents about 40 percent of the total annual precipitation. The annual infiltration rate for low precipitation areas (1.4 centimeters) is based on investigations by Cecil et al. (1992). This latter work was conducted in areas of native vegetation at the Idaho National Engineering and Environmental Laboratory in eastern Idaho. Using stable isotopes and other tracers, a long-term estimate of 1 centimeter per year infiltration was calculated.

This represents approximately five percent of total annual precipitation. This percentage was applied to the total annual precipitation in Boise (11.7 inches/year), with the assumption that Boise conditions represent average low precipitation conditions.

Average soil moisture content values for low and high precipitation conditions were derived by simulating infiltration into a homogeneous soil profile with the sandy loam hydraulic properties discussed above. The variably saturated flow and transport code HYDRUS-1D (Kool and van Genuchten, 1991) was used to conduct the simulations. The simulation was run until steady-state conditions were achieved and the moisture content at that time was noted.

The moisture content in the capillary fringe and the capillary fringe thickness were derived using methods and equations described in EPA (2003). The mean particle diameter of 0.03 centimeters used in these calculations is typical of a sandy loam soil type.

Saturated Zone

The default scenario selected to represent the saturated zone is a sandy, alluvial aquifer of moderate hydraulic conductivity. Selected saturated zone properties and ground water mixing zone thickness were taken from those developed for the soils protective of ground water pathway (Appendix A) in the *Risk Based Corrective Action Guidance Document for Petroleum Releases* (DEQ, 1996). The darcy velocity chosen (3,340 centimeters/year) is from ground water class 2. Total porosity, bulk density, and fraction organic carbon are similar to that of the unsaturated zone soil.

ENCLOSED SPACE PARAMETERS

The enclosed space parameters are used in combination with soil and ground water properties to define the conditions controlling volatilization of vapors from soil or ground water into indoor spaces and to predict exposure point concentrations of chemicals in indoor air. Scenarios were developed for residential and nonresidential settings. Both the residential and nonresidential scenarios selected consist of one-story, slab-on-grade structures lying directly over the source of contamination. The primary differences between the two scenarios are the size of the structure and the number of air exchanges per time period. The nonresidential structure is larger and exchanges more air than the residential structure.

The size of structure for each scenario was based on residential and commercial building survey data collected by the U.S. Department of Energy (DOE, 1995, 2001). Data from the western census region of the 1993 housing survey (DOE, 1995) were used to further describe residential structures. Thirty-three percent of all homes in this region had heated floor space square footage between 1,000 and 1,599 square feet, constituting the largest proportion of all classes. Approximately 50 percent of all homes were one-story, single-family homes. The next largest category was multi-story apartment buildings, comprising with 29 percent of the homes. Homes with concrete slabs or crawl spaces each constituted about one-third of all homes, while 15 percent had basements. A sensitivity analysis evaluating the impact of concrete slabs vs. crawl spaces on target levels showed little difference.

For nonresidential structures, data from the mountain division of the western region of the 1999 commercial building energy consumption survey was used (DOE, 2001). The median square footage per building in this area was 5,000 square feet. Sixty-six percent of all buildings in this area were one-floor structures. A slab-on-grade foundation and indoor building height of 8 feet was assumed.

The default value chosen for air exchange rates in commercial buildings is based on expected values for buildings built to meet ventilation standards of the American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHRAE, 2004). The default value for residential structures is based on an analysis by the Michigan Department of Environmental Quality (MDEQ, 1998). Values for other structural parameters, specifically the dimensions of foundation cracks, wall/foundation thickness, and pressure differentials between the space and

the outdoors, are based on data presented in the *User's Guide for Evaluating Subsurface Vapor Intrusion into Buildings* (EPA, 2003).

In the Johnson-Ettinger model equations, there is a dependent relationship between the width of foundation cracks (equivalent crack radius) and the fraction of the total floor space below grade occupied by cracks. It was decided to fix the equivalent crack width at 0.1 centimeters and allow the fraction of cracks to vary during the calculation of the total area of cracks in the default structure with a minimum value of 0.0005 specified. This minimum value is what is suggested as a reasonable lower end of the range for this parameter by Johnson (2005).

Source characteristics for calculation of indoor air pathways assumed a 1-foot separation distance between the top of the soil or ground water source and the building foundation.

For ground water sources, this soil separation distance includes the capillary fringe thickness of 25 centimeters. In making finite mass calculations the soil source was assumed to be 5 feet (153 centimeters) thick.

PARTICULATE EMISSION FACTOR PARAMETERS

All parameter values used in the calculation of the particulate emission factor are taken directly from the U.S. Environmental Protection Agency's soil screening guidance (EPA, 1996). Idaho specific values for the Q/C dispersion factor for a 0.5-acre size source and the average wind speed for Boise were selected as default values.

MODELS

The default models selected to estimate the transport of chemicals between various media and within select media such as ground water include:

- The Johnson-Ettinger model (Johnson and Ettinger, 1991) for transport of volatile chemicals between soil or ground water and indoor air. This implementation of the model includes the effects of advection near the building and diffusion to the building from the source and infinite and finite source masses. This model does not incorporate biodegradation of chemicals during transport from the source into the indoor air.
- The dilution attenuation factor model for the soil to ground water pathway implemented in the EPA Soil Screening Guidance (EPA, 1996). Soil leachate generated using the high infiltration rate is mixed with ground water having the darcy velocity described above. Target levels are estimated in ground water directly below the source.
- The Domenico model for transport of chemicals in the saturated zone. This is a steady-state model that includes advection, sorption, three dimensional dispersion, and decay (Domenico, 1990). Equations for calculating dispersivity values for use in the ground water transport model are those derived by Xu and Eckstein (1995).
- The Cowherd equation for transport and dispersion of particulates as described in the EPA Soil Screening Guidance (EPA, 1996).

PARAMETER	SYMBOL	UNITS	DEFAULT VALUE	REFERENCE
SOIL PARAMETERS				
Unsaturated Zone Soil				
Source-building separation	LTs	cm	30	PJ
Source bottom-building separation	LTSB	cm	183	PJ
Vapor permeability	kv	cm ²	5.0E-9	Calculated
Mean particle diameter	D	cm	0.030	EPA, 2003
Van Genuchten curve shape parameter	n	-	1.449	EPA, 2003
Thickness of capillary fringe zone	hcap	cm	25	EPA, 2003
Dilution Attenuation Factor (DAF) in the unsaturated zone (user-defined)	DAF _{unsat}	--	1	PJ
Total soil porosity in the vadose zone	θ _T	cm ³ /cm ³ -soil	0.39	EPA, 2003
Volumetric water content in vadose zone	θ _{ws}	cm ³ /cm ³	0.17	PJ
Volumetric air content in vadose zone	θ _{as}	cm ³ /cm ³	0.22	Calculated
Dry soil bulk density	ρ _s	g/cm ³	1.64	PJ
Fractional organic carbon content in the vadose zone	foc	g-C/g-soil	0.001	PJ
Volumetric water content in the foundation/wall cracks	θ _{wcrack}	cm ³ /cm ³	0.17	PJ
Volumetric air content in the foundation/wall cracks	θ _{acrack}	cm ³ /cm ³	0.22	Calculated
Volumetric water content in capillary fringe zone	θ _{wcap}	cm ³ /cm ³	0.32	EPA, 2003
Volumetric air content in capillary fringe zone	θ _{acap}	cm ³ /cm ³	0.07	EPA, 2003
SATURATED ZONE SOIL				
Dry soil bulk density	ρ _{ss}	g/cm ³	1.64	PJ

PARAMETER	SYMBOL	UNITS	DEFAULT VALUE	REFERENCE
Fractional organic carbon content	focs	g-C/g-soil	0.001	PJ
Total soil porosity	θTs	cm ³ /cm ³ -soil	0.39	PJ
Volumetric water content	θwss	cm ³ /cm ³	0.39	PJ
Volumetric air content	θass	cm ³ /cm ³	0.0	PJ
AIR PROPERTY				
Viscosity of air		g/cm-s	1.8E-4	
GROUND WATER PARAMETERS				
Water table-building separation	LTgw	cm	30	PJ
Ground water darcy velocity	Ugw	cm/year	3340	DEQ, 1996
Ground water mixing zone thickness	δgw	cm	153	DEQ, 1996
Length of ground water source parallel to ground water flow direction	Lmz	cm	1220	PJ
Width of ground water source perpendicular to ground water flow direction	Wgw	cm	1220	PJ
Infiltration rate	I	cm/year	25	PJ
ENCLOSED SPACE PARAMETERS				
Area of the Enclosed Space Below Grade				
Residential	AB	cm ²	1561600	Calculated
Nonresidential	AB	cm ²	4782069	Calculated
Enclosed Space Foundation/Wall Thickness				
Residential	Lcrack	cm	15	EPA, 2003
Nonresidential	Lcrack	cm	15	EPA, 2003
Total area of Cracks				

PARAMETER	SYMBOL	UNITS	DEFAULT VALUE	REFERENCE
Residential	Acrack	cm ²	484	Calculated
Non-residential	Acrack	cm ²	861	Calculated
Number of Air Exchanges per Second				
Residential	ER	1/hr	1	MDEQ, 1998
Nonresidential	ER	1/hr	1	ASHRAE, 2004
Length of Enclosed Space				
Residential	LB	cm	1220	DOE, 1995
Nonresidential	LB	cm	2157	DOE, 2001
Width of Enclosed Space				
Residential	WB	cm	1220	DOE, 1995
Nonresidential	WB	cm	2157	DOE, 2001
Height of Enclosed Space				
Residential	HB	cm	244	PJ
Nonresidential	HB	cm	244	PJ
Floor-Wall Seam Perimeter				
Residential	Xcrack	cm	4880	Calculated
Nonresidential	Xcrack	cm	8628	Calculated
Crack depth below grade	Zcrack	cm	15	Calculated
Equivalent crack radius	rcrack	cm	0.1	EPA, 2003
Pressure differential between enclosed space and soil surface beneath	ΔP	g/cm-s ²	40	EPA, 2003
COWHERD PARTICULATE EMISSION MODEL				
Inverse of the mean concentration at the center of a square source	Q/C	(g/m ² -s) / (kg/m ³)	69.41	EPA, 1996

PARAMETER	SYMBOL	UNITS	DEFAULT VALUE	REFERENCE
Fractional vegetative cover	V	m ² /m ²	0.5	EPA, 1996
Mean annual wind speed	Um	m/s	3.98	EPA, 1996
Equivalent threshold value of wind speed at 7 m	Ut	m/s	11.32	EPA, 1996
Wind speed distribution function from Cowherd et. al, 1985	F(x)	--	4.95E-2	EPA, 1996
AVERAGING TIME FOR VAPOR FLUX				
Resident child	AT	sec	1.89E8	PJ
Resident adolescent	AT	sec	2.84E9	PJ
Resident adult	AT	sec	4.73E9	PJ
Nonresidential adult worker	AT	sec	2.08E9	PJ
Construction worker	AT	sec	3.15E7	PJ
GROUND WATER PROTECTION				
Distance to the point of exposure	Xpoe	cm	0	PJ
Distance to the point of compliance	Xpoc	cm	0	PJ

PJ – Professional Judgment

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**APPENDIX A-3 DEFAULT PHYSICAL AND CHEMICAL
PROPERTIES**

CHEMICALS	CAS Number	Molecular Weight	Water Solubility (mg/L)	Henry's Law Constant (L-air/L-water)	Organic Carbon Adsorption Coefficient. Koc (mL/g)	Vapor Pressure (mm Hg)	Diffusion Coefficient in Air (cm ² /s)	Diffusion Coefficient in Water (cm ² /s)
Acenaphthene	83-32-9	154.2	3.9	7.5E-03	5027	1.6E-03	0.05	8.3E-06
Anthracene	120-12-7	178.2	0.0434	2.3E-03	16360	2.0E-04	0.039	7.9E-06
Benzene	71-43-2	78.1	1790	0.23	145.8	9.500E+01	0.09	9.5E-6
Benzo(a)anthracene	56-55-3	228.3	0.0094	4.9E-04	176900	1.1E-07	0.051	9.0E-06
Benzo(a)pyrene	50-32-8	252.3	0.00162	1.9E-05	587400	5.5E-09	0.043	9.0E-06
Benzo(b)fluoranthene	205-99-2	252.3	0.0015	2.7E-05	599400	5.0E-07	0.023	5.6E-06
Benzo(k)fluoranthene	207-08-9	252.3	0.0008	2.4E-05	587400	9.6E-11	0.023	5.6E-06
Chrysene	218-01-9	228.3	0.002	2.1E-04	180500	6.3E-09	0.025	6.2E-06
1,2-Dichloroethane	107-06-2	99.0	8520	4.8E-02	14.10	8.7E+01	0.086	1.1E-05
Ethylbenzene	100-41-4	106.2	169	3.2E-01	446	1.0E+01	0.075	7.8E-06
Ethylene Dibromide	106-93-4	187.9	4320	2.930E-02	53.70	1.100E+01	0.083	8.0E-06
Fluoranthene	206-44-0	202.3	0.26	3.6E-04	55450	5.0E-06	0.030	6.4E-06
Fluorene	86-73-7	166.2	1.69	3.9E-03	9160	1.0E-04	0.044	7.9E-06
MTBE	1634-04-4	88.2	51000	2.4E-02	12	2.490E+02	0.075	8.6E-06
Naphthalene	91-20-3	128.0	31	1.8E-02	1544	2.3E-01	0.06	8.4E-06
Pyrene	129-00-0	202.3	0.135	4.9E-04	54340	6.9E-07	0.028	7.2E-06
Toluene	108-88-3	92.1	526	2.70E-01	234	2.2E+01	0.078	9.2E-06
Total Xylenes	1330-20-7	106.2	108	2.1E-01	383	8.80E+00	0.085	9.9E-06

Values for physical and chemical properties (with the exception of vapor pressure) are taken from the United States Environmental Protection Agency Regional Screening Levels website (May 2010 version) Chemical Specific Parameter Supporting Table. This table is available at:

http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/pdf/params_sl_table_run_MAY2010.pdf

Values for vapor pressure at 20-25 degrees Celsius were obtained from the *Groundwater Chemicals Desk Reference, Volume 1*, John H. Montgomery and Linda M. Welkom, 1991, Lewis Publishers and *Groundwater Chemicals Desk Reference, Volume 2*, John H. Montgomery, 1991, Lewis Publishers.

APPENDIX A-4 DEFAULT TOXICITY VALUES

The table provides a list of the default carcinogenic and non-carcinogenic toxicity factors and oral and dermal relative absorption factors used in the risk evaluation process. All toxicity factor values and oral relative absorption factors and dermal relative absorption factors for PAHs were obtained from the U.S. Environmental Protection Agency Regional Screening Level (RSL) website:

http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/index.htm

The U.S. Environmental Protection Agency in their Risk Assessment Guidance for Superfund, Volume I: Human Health Evaluation Manual (Part E, Supplemental Guidance for Dermal Risk Assessment) did not provide recommendations for dermal relative absorption factors for volatile organic compounds (VOCs). The source of dermal relative absorption factors for VOCs in the table is June 2003 guidance issued by U.S. Environmental Protection Agency Region 3:

<http://www.epa.gov/reg3hwmd/risk/human/info/dermalag.htm>

		Oral Slope Factor	Unit Inhalation Risk	Oral Reference Dose	Inhalation Reference Concentration	Oral Relative Absorption Factor	Dermal Relative Absorption Factor
CHEMICALS	CAS Number	(kg-day/mg)	(ug/m3)	(mg/kg-day)	(mg/m3)	---	---
Acenaphthene	83-32-9	NA	NA	6.0E-2	NA	1	0.13
Anthracene	120-12-7	NA	NA	3.0E-1	NA	1	0.13
Benzene	71-43-2	5.5E-2	7.8E-6	4.0E-3	3.0E-2	1	0
Benzo(a)anthracene	56-55-3	7.3E-1	1.1E-4	NA	NA	1	0.13
Benzo(a)pyrene	50-32-8	7.3E0	1.1E-3	NA	NA	1	0.13
Benzo(b)fluoranthene	205-99-2	7.3E-1	1.1E-4	NA	NA	1	0.13
Benzo(k)fluoranthene	207-08-9	7.3E-2	1.1E-4	NA	NA	1	0.13
Chrysene	218-01-9	7.3E-3	1.1E-5	NA	NA	1	0.13
1,2-Dichloroethane	107-06-2	9.1E-2	2.6E-5	2.0E-2	2.4E0	1	0
Ethylbenzene	100-41-4	1.1E-2	2.5E-6	1.0E-1	1.0E0	1	0
Ethylene Dibromide	106-93-4	2.0E0	6.0E-4	9.0E-3	9.0E-3	1	0
Fluoranthene	206-44-0	NA	NA	4.0E-2	NA	1	0.13
Fluorene	86-73-7	NA	NA	4.0E-2	NA	1	0.13
MTBE	1634-04-4	1.8E-3	2.6E-7	NA	3.0E0	1	0
Naphthalene	91-20-3	NA	3.4E-5	2.0E-2	3.0E-3	1	0.13
Pyrene	129-00-0	NA	NA	3.0E-2	NA	1	0.13
Toluene	108-88-3	NA	NA	8.0E-2	5.0E0	1	0
Total Xylenes	1330-20-7	NA	NA	2.0E-1	1.0E-1	1	0

APPENDIX A-5: DEFAULT MODELS AND EQUATIONS

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H.1 TARGET LEVELS FOR RESIDENTIAL, NON-RESIDENTIAL, AND CONSTRUCTION EXPOSURES

A.5.1.1 INDOOR INHALATION OF VAPOR EMISSIONS

Carcinogenic effects

$$RBTL_{ai} = \frac{TR \times AT_c \times 365}{ED \times EF \times ET_i \times IUR}$$

Non-carcinogenic effects

$$RBTL_{ai} = \frac{THQ \times AT_{nc} \times 365}{ED \times EF \times ET_i \times (1/RfC)}$$

Source: USEPA, 2009; modified from equations 6 and 11

Where:

$RBTL_{ai}$ =	Risk-based target level for indoor air inhalation [mg/m ³]
TR =	Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
THQ =	Target hazard quotient for individual constituents [-]
AT_c =	Averaging time for carcinogens [years]
AT_{nc} =	Averaging time for non-carcinogens [years]
ED =	Exposure duration [years]
EF =	Exposure frequency [days/year]
ET_i =	Exposure time for indoor inhalation [hours/day]
RfC =	Chemical-specific inhalation reference concentration [mg/m ³]
IUR =	Chemical-specific inhalation unit risk [(mg/m ³) ⁻¹]
365 =	Conversion factor [days/year]

A.5.1.2 OUTDOOR INHALATION OF VAPORS AND PARTICULATES FROM SURFICIAL SOIL

Carcinogenic effects

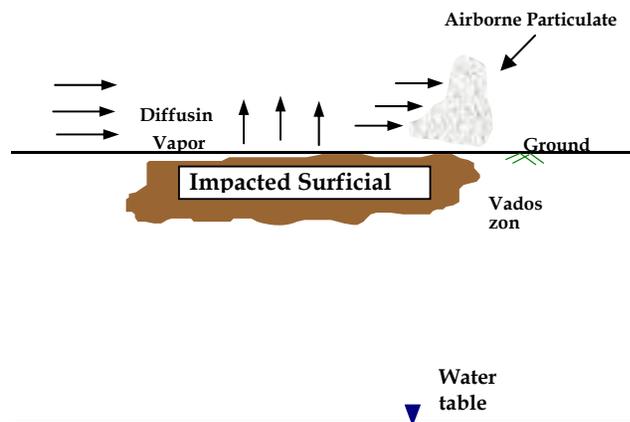
$$RBTL_{SS} = \frac{TR \times AT_c \times 365}{ED \times EF_d \times ET \times IUR \times \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

Non-carcinogenic effects

$$RBTL_{SS} = \frac{THQ \times AT_{nc} \times 365}{ED_c \times EF_d \times ET \times (1/RfC) \times \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

Where:

- $RBTL_{SS}$ = Risk-based target level for outdoor inhalation of vapors and particulates from surficial soil [mg/kg dry weight]
- TR = Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
- THQ = Target hazard quotient for individual constituents [-]
- VF = Surficial soil to ambient air volatilization factor [(m³-air)/(kg-soil)]
- PEF = Particulate Emission Factor [(m³-air)/(kg-soil)]
- AT_c = Averaging time for carcinogens [years]
- AT_{nc} = Averaging time for non-carcinogens [years]
- ED_c = Exposure duration [years]
- EF_d = Exposure frequency for direct contact pathway [days/year]
- ET = Exposure time [hours/day]
- RfC = Chemical-specific inhalation reference concentration [mg/m³]
- IUR = Chemical-specific inhalation unit risk [(mg/m³)⁻¹]
- 365 = Conversion factor [days/year]



Source: U.S. Environmental Protection Agency, 2010

A.5.1.3 DIRECT INGESTION OF SURFICIAL SOIL

Carcinogenic effects

$$RBTL_s = \frac{TR \times BW \times AT_c \times 365}{SF_o \times EF_d \times ED \times IR_s \times RAF_o \times 10^{-6}}$$

Non-carcinogenic effects

$$RBTL_s = \frac{THQ \times BW \times AT_{nc} \times 365 \times RfD_o}{EF_d \times ED \times IR_s \times RAF_o \times 10^{-6}}$$

Source: U.S. Environmental Protection Agency, 1996, p. 19.

Where:

- $RBTL_s$ = Risk-based target level for the ingestion of soil [mg/kg-wet soil]
- TR = Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
- THQ = Target hazard quotient for individual constituents [-]
- BW = Body weight [kg]
- AT_c = Averaging time for carcinogens [years]
- AT_{nc} = Averaging time for non-carcinogens [years]
- ED = Exposure duration [years]
- EF_d = Exposure frequency [days/year]
- IR_s = Soil ingestion rate [mg/day]
- RAF_o = Oral relative absorption factor [-]
- RfD_o = Chemical-specific oral reference dose [mg/(kg-day)]
- SF_o = Chemical-specific oral cancer slope or potency factor [mg/(kg-day)]⁻¹
- 365 = Conversion factor [days/year]
- 10⁻⁶ = Conversion factor [kg/mg]

A.5.1.4 DERMAL CONTACT WITH SURFICIAL SOIL

Carcinogenic effects

$$RBTL_{DC} = \frac{TR \times BW \times AT_c \times 365}{SF_o \times SA \times M \times RAF_d \times ED \times EF_d \times 10^{-6}}$$

Non-carcinogenic effects

$$RBTL_{DC} = \frac{THQ \times BW \times AT_{nc} \times 365 \times RfD_o}{SA \times M \times RAF_d \times ED \times EF_d \times 10^{-6}}$$

Source: Modified from U.S. Environmental Protection Agency, 1989, Vol. I, Part A, p. 6-41; See also EPA(2007), Appendix D, p. D-6

Where:

- $RBTL_{DC}$ = Risk-based target level for dermal contact with soil [mg/kg-wet soil]
- TR = Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
- THQ = Target hazard quotient for individual constituents [-]
- BW = Body weight [kg]
- AT_c = Averaging time for carcinogens [years]
- AT_{nc} = Averaging time for non-carcinogens [years]
- ED = Exposure duration [years]
- EF_d = Exposure frequency for direct contact pathway [days/year]
- RAF_d = Dermal relative absorption factor [-]
- SA = Skin surface area [cm²/day]
- M = Soil to skin adherence factor [mg/cm²]
- RfD_o = Chemical-specific oral reference dose [mg/(kg-day)]
- SF_o = Chemical-specific oral cancer slope or potency factor [mg/(kg-day)]⁻¹
- 365 = Conversion factor [days/year]
- 10⁻⁶ = Conversion factor [kg/mg]

A.5.1.5 COMBINED SURFICIAL SOIL PATHWAY: INGESTION, INHALATION OF VAPORS AND PARTICULATES, AND DERMAL CONTACT

Carcinogenic effects

$$RBTL_{ss-combined} = \frac{TR \times BW \times AT_c \times 365}{ED \times EF_d \times SF_o \times 10^{-6} [(IR_{soil} \times RAF_o) + (SA \times M \times RAF_d)]} + \frac{TR \times AT_c \times 365}{ED \times EF_d \times ET \times IUR \times \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

Non-carcinogenic effects

$$RBTL_{ss-combined} = \frac{THQ \times BW \times AT_{nc} \times 365}{ED \times EF_d \times 10^{-6} \times \frac{1}{RfD_o} [(IR_{soil} \times RAF_o) + (SA \times M \times RAF_d)]} + \frac{THQ \times AT_c \times 365}{ED \times EF_d \times ET \times \frac{1}{RfC} \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

Note: All parameters are defined under the individual pathway equations.

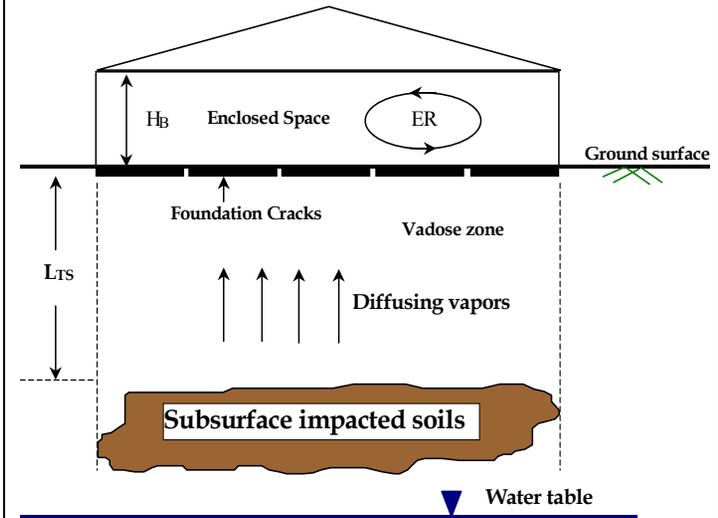
A.5.1.6 SUBSURFACE SOIL CONCENTRATIONS PROTECTIVE OF INDOOR VAPOR INHALATION

$$RBTL_{si} = \frac{RBTL_{ai} * EF}{\alpha}$$

Where:

- $RBTL_{si}$ = Risk-based target level for indoor inhalation of vapors from subsurface soils [mg/kg of dry soil]
 $RBTL_{ai}$ = Risk-based target level for indoor inhalation of air [mg/m^3 of air]
 α = Attenuation factor from subsurface soil to indoor (enclosed space) air derived from the Johnson-Ettinger model [dimensionless]
 EF = Equilibrium factor to convert vapor target level to total soil target level

$$= \frac{\Theta_{ws} + (K_D \rho_s) + (H \Theta_{as})}{(H \rho_s)} * 0.001$$



A.5.1.7 GROUND WATER CONCENTRATIONS PROTECTIVE OF INDOOR VAPOR INHALATION

$$RBTL_{wi} = \frac{RBTL_{ai} * EF}{\alpha}$$

Where:

$RBTL_{wi}$ = Risk-based target level for indoor inhalation of vapors from groundwater [mg/l of H₂O]

$RBTL_{ai}$ = Risk-based target level for indoor inhalation of air (mg/m³ of air)

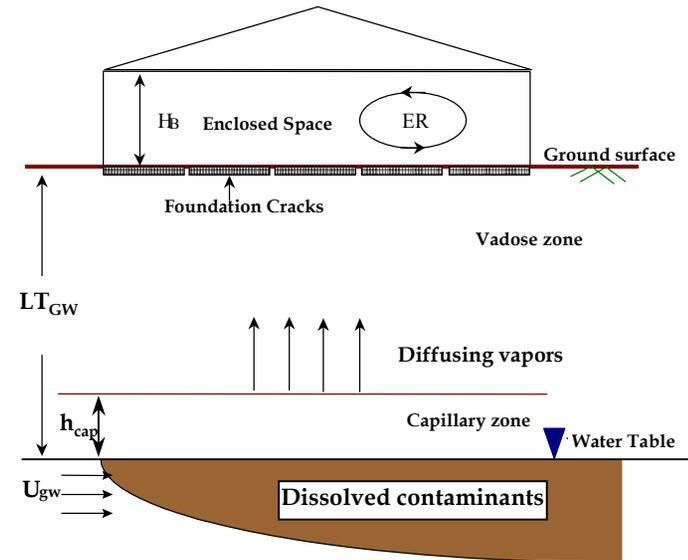
α = Attenuation factor from groundwater to indoor (enclosed space) air derived from the Johnson-Ettinger model [dimensionless]

EF = Equilibrium factor to convert vapor target level to water target level

$$= (1/H) * 0.001 \text{ m}^3/\text{L}$$

Where:

H = Henry's Constant [dimensionless]



A.5.1.8 DIRECT INGESTION OF GROUND WATER

Carcinogenic effects

$$RBTL_w = \frac{TR \times BW \times AT_c \times 365}{IR_w \times ED \times EF \times SF_o}$$

Non-carcinogenic effects

$$RBTL_w = \frac{THQ \times BW \times AT_{nc} \times 365 \times RfD_o}{IR_w \times ED \times EF}$$

Source: Modified from U.S. Environmental Protection Agency, 1989, Vol. I, Part A, p. 6-35.

Where:

- $RBTL_w$ = Risk-based target level for ingestion of groundwater [mg/L-H₂O]
- TR = Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
- THQ = Target hazard quotient for individual constituents [-]
- BW = Body weight [kg]
- AT_c = Averaging time for carcinogens [years]
- AT_{nc} = Averaging time for non-carcinogens [years]
- IR_w = Water ingestion rate [L/day]
- ED = Exposure duration [years]
- EF = Exposure frequency [days/year]
- RfD_o = Chemical-specific oral reference dose [mg/(kg-day)]
- SF_o = Chemical-specific oral cancer slope or potency factor [mg/(kg-day)]⁻¹
- 365 = Conversion factor [days/year]

A.5.1.9 JOHNSON AND ETTINGER INFINITE SOURCE MODEL

The model predicts the vapor concentration inside a building from the measured soil-vapor, soil, or groundwater concentration.

$$C_{building} = \alpha \times C_{source}$$

Where:

$$C_{source} = \frac{H \times C_{soil} \times \rho_s}{\theta_{ws} + K_d \times \rho_s + H \times \theta_{as}}$$

OR

$$C_{source} = H \times C_w$$

OR

$$C_{source} = \text{Measured soil-vapor concentration [mg/L]}$$

- $C_{building}$ = Steady-state vapor-phase concentration in the building [mg/L]
- α = Attenuation coefficient in the vapor phase [-]
- C_{source} = Vapor-phase concentration at the source [mg/L]
- C_{soil} = Concentration in soil [mg/kg]
- C_w = Concentration in groundwater [mg/L]
- H = Chemical-specific Henry's Law constant [(L of H₂O)/(L of air)]
- ρ_s = Dry soil bulk density [g of soil/cm³ of soil]
- θ_{ws} = Volumetric water content in vadose zone soils [cm³ of H₂O/cm³ of soil]
- K_d = $f_{oc} \times K_{oc}$
= Chemical-specific soil-water sorption coefficient [cm³ of H₂O/g of soil]
- θ_{as} = Volumetric air content in vadose zone soils [cm³ of air/cm³ of soil]

$$\alpha = \frac{\frac{D_T^{eff} A_B}{Q_{building} L_T} \times EXP\left(\frac{Q_{soil} L_{crack}}{D_{crack}^{eff} A_{crack}}\right)}{EXP\left(\frac{Q_{soil} L_{crack}}{D_{crack}^{eff} A_{crack}}\right) + \frac{D_T^{eff} A_B}{Q_{building} L_T} + \frac{D_T^{eff} A_B}{Q_{soil} L_T} \times \left[EXP\left(\frac{Q_{soil} L_{crack}}{D_{crack}^{eff} A_{crack}}\right) - 1\right]}$$

Source: User's guide for evaluating subsurface vapor intrusion into buildings USEPA(2003).

- D_T^{eff} [cm²/s] = Total overall effective diffusion coefficient
- D_{crack}^{eff} [cm²/s] = Effective diffusion coefficient through cracks
- A_B = Area of the enclosed space below grade [cm²]
- $Q_{building}$ = Building ventilation rate [cm³/s]
- L_T = Source-building separation [cm]
- Q_{soil} = Volumetric flow rate of soil gas into the enclosed space [cm³/s]
- L_{crack} = Enclosed space foundation or slab thickness [cm]
- A_{crack} = Total area of cracks [cm²]

A.5.1.9 JOHNSON AND ETTINGER INFINITE SOURCE MODEL (CONTINUED)

Where:

$$Q_{building} = L_B W_B H_B ER$$

$$Q_{soil} = \frac{2\pi\Delta P k_v X_{crack}}{\mu \ln\left(\frac{2Z_{crack}}{r_{crack}}\right)}$$

For vapor release from soil:

$$D_T^{eff} = \frac{L_T}{\sum_{i=0}^n \frac{L_i}{D_i^{eff}}}$$

For vapor release from ground water:

$$D_T^{eff} = D_s^{eff} \quad D_{crack}^{eff} = D_s^{eff}$$

$$D_T^{eff} = D_{ws}^{eff} = \frac{L_T}{\frac{h_{cap}}{D_{cap}^{eff}} + \frac{(L_T - h_{cap})}{D_s^{eff}}} \quad h_{cap} = \frac{0.75}{D}$$

$Q_{building}$	=	Building ventilation rate [cm ³ /s]
L_B	=	Length of building [cm]
W_B	=	Width of building [cm]
H_B	=	Height of building [cm]
ER	=	Air exchange rate [1/s]
Q_{soil}	=	Volumetric flow rate of soil gas into the enclosed space [cm ³ /s]
π	=	3.14159
ΔP	=	Pressure differential between the soil surface and the enclosed space [g/cm-s ²]
k_v	=	Soil vapor permeability [cm ²]
X_{crack}	=	Floor-wall seam perimeter [cm]
μ	=	Viscosity of air [g/cm-s]
Z_{crack}	=	Crack depth below grade [cm]
r_{crack}	=	Equivalent crack radius [cm]
D_T^{eff}	=	Total overall effective diffusion coefficient [cm ² /s]
L_T	=	Source-building separation [cm]
L_i	=	Thickness of soil layer i [cm]
D_i^{eff}	=	Effective diffusion coefficient in soil layer i [cm ² /s]
N	=	Number of soil layers [-]
D_s^{eff}	=	Effective diffusion coefficient in soil [cm ² /s]
D_{ws}^{eff}	=	Effective diffusion coefficient in capillary fringe [cm ² /s]
h_{cap}	=	Thickness of capillary fringe zone [cm]
D_{cap}^{eff}	=	Effective diffusion coefficient in the capillary fringe soil [cm ² /s]
D_{crack}^{eff}	=	Effective diffusion coefficient in the foundation/wall cracks [cm ² /s]
D	=	Mean particle diameter [cm]

A.5.1.10 JOHNSON AND ETTINGER FINITE SOURCE MODEL

The model predicts the vapor concentration inside a building from the measured soil concentration when the thickness of soil contamination is known.

$$C_{building} = \alpha \times C_{source}$$

Where:

$$C_{source} = \frac{H \times C_{soil} \times \rho_s}{\theta_{ws} + K_d \times \rho_s + H \times \theta_{as}}$$

$$\alpha = \frac{\rho_s C_{soil} \Delta H_c A_B}{Q_{building} C_{source} \tau} \left(\frac{L_T^0}{\Delta H_c} \right) \left[\left(\beta^2 + 2 \psi \tau \right)^{1/2} - \beta \right]$$

$$\beta = \left(\frac{D_T^{eff} A_B}{L_T^0 Q_{soil}} \right) \left[1 - \exp \left(- \frac{Q_{soil} L_{crack}}{D_{crack}^{eff} A_{crack}} \right) \right] + 1$$

$$\psi = \frac{D_T^{eff} C_{source}}{(L_T^0)^2 \rho_s C_{soil}}$$

$$\tau_D = \frac{\left[\frac{\Delta H_c}{L_T^0} + \beta \right]^2 - \beta^2}{2 \psi}$$

Source: User's guide for evaluating subsurface vapor intrusion into buildings USEPA(2003).

$C_{building}$	=	Steady-state vapor-phase concentration in the building [mg/L]
α	=	Attenuation coefficient in the vapor phase [-]
C_{source}	=	Vapor-phase concentration at the source [mg/L]
C_{soil}	=	Original Concentration in soil [mg/kg]
C_w	=	Concentration in groundwater [mg/L]
H	=	Chemical-specific Henry's Law constant [(L of H ₂ O)/(L of air)]
ρ_s	=	Dry soil bulk density [g of soil/cm ³ of soil]
θ_{ws}	=	Volumetric water content in vadose zone soils [cm ³ of H ₂ O/cm ³ of soil]
K_d	=	$f_{oc} \times K_{oc}$ Chemical-specific soil-water sorption coefficient [cm ³ of H ₂ O/g of soil]
θ_{as}	=	Volumetric air content in vadose zone soils [cm ³ of air/cm ³ of soil]
ΔH_c	=	Initial thickness of contamination [cm]
τ_D	=	Time for source depletion [seconds]
τ	=	Exposure interval [seconds]
D_T^{eff}	=	Total overall effective diffusion coefficient [cm ² /s]
D_{crack}^{eff}	=	Effective diffusion coefficient through cracks [cm ² /s]
A_B	=	Area of the enclosed space below grade [cm ²]
$Q_{building}$	=	Building ventilation rate [cm ³ /s]
L_T^0	=	Source-building separation at time = 0 [cm]
Q_{soil}	=	Volumetric flow rate of soil gas into the enclosed space [cm ³ /s]
A_{crack}	=	Total area of cracks [cm ²]
L_{crack}	=	Enclosed space foundation or slab thickness [cm]

A.5.2 TARGET LEVELS FOR RESIDENTIAL EXPOSURES

A.5.2.1 INDOOR INHALATION OF VAPOR EMISSIONS

Carcinogenic effects

$$RBTL_{ai-res} = \frac{TR \times AT_c \times 365}{EF_r \times ED_r \times ET_{ra} \times IUR}$$

Non-carcinogenic effects

$$RBTL_{ai-res} = \frac{THQ \times AT_{nc} \times 365 \times RfC}{EF_r \times ED_r \times ET_{ra}}$$

Source: USEPA, 2009; modified from equations 6 and 11

Where:

$RBTL_{ai-res}$	= Residential risk-based target level in indoor air [mg/m^3]
TR	= Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
THQ	= Target hazard quotient for individual constituents [-]
AT_c	= Averaging time for carcinogens [years]
AT_{nc}	= Averaging time for non-carcinogens [years]
ED_r	= Exposure duration for resident [years]
EF_r	= Residential Exposure frequency [days/year]
ET_{ra}	= Indoor residential exposure time [hours/day]
RfC	= Chemical-specific inhalation reference concentration [mg/m^3]
IUR	= Chemical-specific inhalation unit risk [mg/m^3] ⁻¹
365	= Conversion factor [days/year]

A.5.2.2 OUTDOOR INHALATION OF VAPORS AND PARTICULATES FROM SURFICIAL SOIL

Carcinogenic effects

$$RBTL_{SS-adj} = \frac{TR \times AT_c \times 365}{ED_r \times EF_{o-r} \times ET_{o-r} \times IUR \times \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

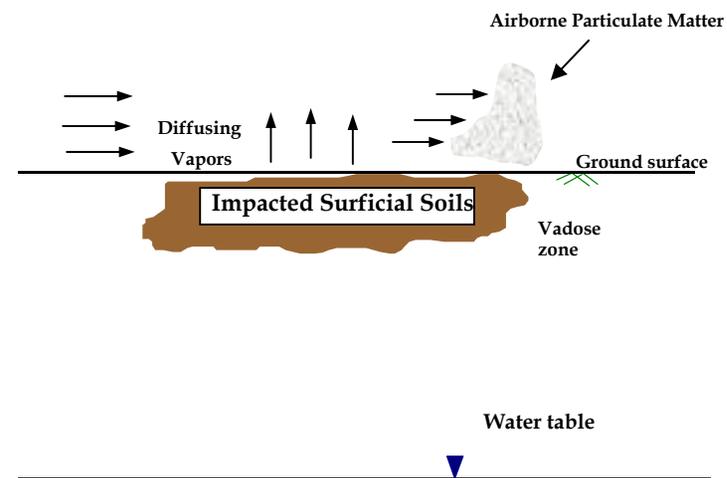
Non-carcinogenic effects

$$RBTL_{SS-adj} = \frac{THQ \times AT_{nc} \times 365 \times RfC}{ED_c \times EF_{o-r} \times ET_{o-r} \times \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

Source: U.S. Environmental Protection Agency, 1996

Where:

- $RBTL_{ss-adj}$ = Age-adjusted risk-based target level in surficial soil [mg/kg]
 TR = Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
 THQ = Target hazard quotient for individual constituents [-]
 VF = Surficial soil to ambient air volatilization factor [(m³-air)/(kg-soil)]
 PEF = Particulate Emission Factor [(m³-air)/(kg-soil)]
 AT_c = Averaging time for carcinogens [years]
 AT_{nc} = Averaging time for non-carcinogens [years]
 ED_c = Exposure duration for child [years]
 ED_r = Residential exposure duration [years]
 EF_{dr} = Residential exposure frequency for direct contact pathway [days/year]
 ET_{o-r} = Residential outdoor exposure time [hours/day]
 RfC = Chemical-specific inhalation reference dose [mg/(m³)]
 IUR = Chemical-specific unit inhalation risk [mg/m³]⁻¹
365 = Conversion factor [days/year]



A.5.2.3 DIRECT INGESTION OF SURFICIAL SOIL

Carcinogenic effects

$$RBTL_{s-adj} = \frac{TR \times AT_c \times 365}{SF_o \times IR_{s-aa} \times RAF_o \times 10^{-6}}$$

Non-carcinogenic effects

$$RBTL_s = \frac{THQ \times AT_{nc} \times 365 \times RfD_o}{IR_{s-c} \times RAF_o \times 10^{-6} \times EF_{res} \times ED_c}$$

Where:

$$IR_{s-aa} = \frac{ED_c \times EF_{dc} \times IR_{s-c}}{BW_c} + \frac{ED_a \times EF_{da} \times IR_{s-a}}{BW_a}$$

Source: U.S. Environmental Protection Agency, 1996, p.20

Where:

$RBTLs$	=	Risk-based target level for ingestion of soil [mg/kg-wet soil]
TR	=	Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
THQ	=	Target hazard quotient for individual constituents [-]
AT_c	=	Averaging time for carcinogens [years]
AT_{nc}	=	Averaging time for non-carcinogens [years]
RAF_o	=	Oral relative absorption factor [-]
RfD_o	=	Chemical-specific oral reference dose [mg/(kg-day)]
SF_o	=	Chemical-specific oral cancer slope or potency factor [mg/(kg-day)] ⁻¹
IR_{s-aa}	=	Age-adjusted soil ingestion rate [mg/kg]
IR_{s-c}	=	Resident Child soil ingestion rate [mg/day]
IR_{s-a}	=	Resident Adult soil ingestion rate [mg/day]
BW_c	=	Resident Child body weight [kg]
BW_a	=	Resident Adult body weight [kg]
ED_c	=	Resident Child exposure duration [year]
ED_a	=	Resident Adult exposure duration [year]
EF_{dc}	=	Exposure frequency for a child for direct contact pathway [days/year]
EF_{da}	=	Exposure frequency for an adult for direct contact pathway [days/year]
365	=	Conversion factor [days/year]
10^{-6}	=	Conversion factor [kg/mg]

A.5.2.4 DERMAL CONTACT WITH SURFICIAL SOIL

Carcinogenic effects

$$RBTL_{DC-adj} = \frac{TR \times AT_c \times 365}{SF_o \times SA_{aa} \times RAF_d \times 10^{-6}}$$

Non-carcinogenic effects

$$RBTL_{DC} = \frac{THQ \times AT_{nc} \times 365 \times RfD_o}{EF \times ED_c \times M_c \times SA_c \times RAF_d \times 10^{-6}}$$

Where:

$$SA_{aa} = \frac{ED_c \times EF_{dc} \times M_c \times SA_c}{BW_c} + \frac{ED_a \times EF_{da} \times M_a \times SA_a}{BW_a}$$

Source: EPA (2007), Appendix D, p. D-6

Where:

$RBTL_{DCj}$	=	Age-adjusted risk-based target level for dermal contact with soil [mg/kg-wet soil]
TR	=	Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
THQ	=	Target hazard quotient for individual constituents [-]
AT_c	=	Averaging time for carcinogens [years]
AT_{nc}	=	Averaging time for non-carcinogens [years]
EF_{dc}	=	Exposure frequency for a child for direct contact pathway [days/year]
EF_{da}	=	Exposure frequency for an adult for direct contact pathway [days/year]
RAF_d	=	Chemical-specific Dermal relative absorption factor [-]
M_c	=	Resident Child soil to skin adherence factor [mg/cm ²]
M_a	=	Resident Adult soil to skin adherence factor [mg/cm ²]
RfD_o	=	Chemical-specific oral reference dose [mg/(kg-day)]
SF_o	=	Chemical-specific oral cancer slope or potency factor [mg/(kg-day)] ⁻¹
SA_{aa}	=	Age-adjusted skin surface area [(mg/ kg]
BW_c	=	Resident Child body weight [kg]
BW_a	=	Resident Adult body weight [kg]
ED_c	=	Resident Child exposure duration [year]
ED_a	=	Resident Adult exposure duration [year]
SA_c	=	Resident Child skin surface area [cm ² /day]
SA_a	=	Resident Adult skin surface area [cm ² /day]
365	=	Conversion factor [days/year]
10^{-6}	=	Conversion factor [kg/mg]

A.5.2.5 COMBINED SURFICIAL SOIL PATHWAY:

INGESTION, INHALATION OF VAPORS AND PARTICULATES, AND DERMAL CONTACT

Carcinogenic effects

$$RBTL_{ss-combined} = \frac{TR \times AT_c \times 365}{SF_o \times 10^{-6} \times [(IR_{s-aa} \times RAF_o) + (SA_{aa} \times RAF_d)]} + \frac{TR \times AT_c \times 365}{ED \times EF_d \times ET \times IUR \times \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

Non-carcinogenic effects

$$RBTL_{ss-combined} = \frac{THQ \times AT_{nc} \times 365}{\frac{1}{RfD_o} \times 10^{-6} \times \left[\left(\left(\frac{ED_c + EF_{dc} + IR_{s-c}}{BW_c} \right) \times RAF_o \right) + \left(\left(\frac{ED_c + EF_{dc} + M_c + SA_c}{BW_c} \right) \times RAF_d \right) \right]} + \frac{THQ \times AT_{nc} \times 365}{ED \times EF_d \times ET \times \frac{1}{RfC} \times \left(\frac{1}{VF} + \frac{1}{PEF} \right)}$$

Note: All parameters are defined under the individual pathway equations.

A.5.2.6 SUBSURFACE SOIL CONCENTRATIONS PROTECTIVE OF INDOOR VAPOR INHALATION

$$RBTL_{si-adj} = \frac{RBTL_{ai-adj} * EF}{\alpha}$$

Where:

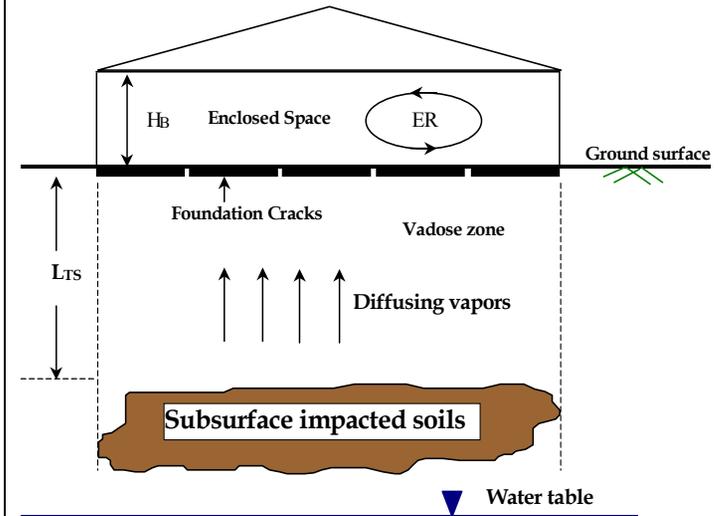
$RBTL_{si-adj}$ = Age-adjusted risk-based target level for indoor inhalation of vapors from subsurface soils [mg/kg of dry soil]

$RBTL_{ai-adj}$ = Age-adjusted risk-based target level for indoor inhalation of air [mg/m³ of air]

α = Attenuation factor from subsurface soil to indoor (enclosed space) air derived from the Johnson-Ettinger model [dimensionless]

EF = Equilibrium factor to convert vapor target level to total soil target level

$$= \frac{\Theta_{ws} + (K_D \rho_s) + (H \Theta_{as})}{(H \rho_s)} * 0.001$$



Source: Modified from U.S. Environmental Protection Agency, 2003

A.5.2.7 GROUND WATER CONCENTRATIONS PROTECTIVE OF INDOOR VAPOR INHALATION

$$RBTL_{wi-adj} = \frac{RBTL_{ai-adj}}{\alpha} * EF$$

Where:

$RBTL_{wi-adj}$ = Age-adjusted risk-based target level for indoor inhalation of vapors from groundwater [mg/L of H₂O]

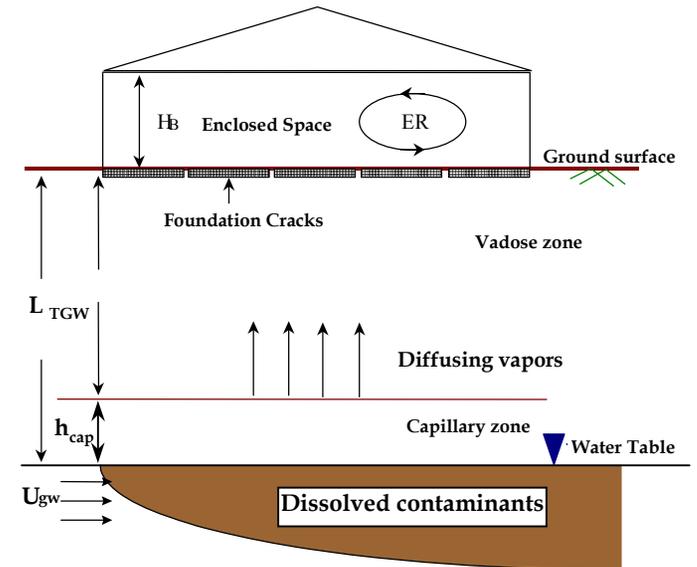
$RBTL_{ai-adj}$ = Age-adjusted risk-based target level for indoor inhalation of air (mg/m³ of air)

α = Attenuation factor from groundwater to indoor (enclosed space) air derived from the Johnson-Ettinger model [dimensionless]

EF = Equilibrium factor to convert vapor target level to water target level
 = $(1/H) * 0.001 \text{m}^3/\text{L}$

Where:

H = Henry's Constant [dimensionless]



Source: Modified from U.S. Environmental Protection Agency, 2003

H.2.8 DIRECT INGESTION OF GROUND WATER

Carcinogenic effects

$$RBTL_{w-adj} = \frac{TR \times AT_c \times 365}{IR_{w-aa} \times SF_o}$$

Non-carcinogenic effects

$$RBTL_{w-adj} = \frac{THQ \times AT_{nc} \times 365 \times RfD_o \times BW_a}{IR_a \times EF \times ED_a}$$

Where:

$$IR_{w-aa} = \frac{ED_c \times EF_c \times IR_{w-c}}{BW_c} + \frac{ED_a \times EF_a \times IR_{w-a}}{BW_a}$$

Source: Modified from U.S. Environmental Protection Agency, 1989, Vol. I, p. 6-35

Where:

$RBTL_{w-adj}$	=	Age-adjusted risk-based target level for ingestion of groundwater [mg/L of H ₂ O]
TR	=	Target risk or the increased chance of developing cancer over a lifetime due to exposure to a chemical [-]
THQ	=	Target hazard quotient for individual constituents [-]
AT_c	=	Averaging time for carcinogens [years]
AT_{nc}	=	Averaging time for non-carcinogens [years]
RfD_o	=	Chemical-specific oral reference dose [mg/(kg-day)]
SF_o	=	Chemical-specific oral cancer slope or potency factor [mg/(kg-day)] ⁻¹
IR_{w-aa}	=	Age-adjusted groundwater ingestion rate [L/kg]
IR_{w-c}	=	Resident Child groundwater ingestion rate [L/day]
IR_{w-a}	=	Resident Adult groundwater ingestion rate [L/day]
BW_c	=	Resident Child body weight [kg]
BW_a	=	Resident Adult body weight [kg]
ED_c	=	Resident Child exposure duration [year]
ED_a	=	Resident Adult exposure duration [year]
EF_c	=	Exposure frequency for a child [days/year]
EF_a	=	Exposure frequency for an adult [days/year]
365	=	Conversion factor [days/year]

A5.3 TARGET LEVELS FOR GROUND WATER RESOURCE PROTECTION

A5.3.1 DOMENICO MODEL: DILUTION ATTENUATION FACTOR (DAF) IN THE SATURATED ZONE

Domenico model for multi-dimensional transport with decay and infinite source:

$$\frac{C(x,y,z,t)}{C_o} = (1/8) \exp \left[\frac{x}{2\alpha_x} \left[1 - \sqrt{1 + \frac{4k\alpha_x}{v}} \right] \right] \times \operatorname{erfc} \left[\frac{(x-vt) \sqrt{1 + \frac{4k\alpha_x}{v}}}{2\sqrt{\alpha_x \times v \times t}} \right] \times \left[\operatorname{erf} \left[\frac{\left(y + \frac{W_{gw}}{2} \right)}{2\sqrt{\alpha_y x}} \right] - \operatorname{erf} \left[\frac{\left(y - \frac{W_{gw}}{2} \right)}{2\sqrt{\alpha_y x}} \right] \right] \times \left[\operatorname{erf} \left[\frac{\left(z + \delta_{gw} \right)}{2\sqrt{\alpha_z x}} \right] - \operatorname{erf} \left[\frac{\left(z - \delta_{gw} \right)}{2\sqrt{\alpha_z x}} \right] \right]$$

Where:

- C = dissolved-phase concentration [mg/L]
- C_o = dissolved-phase concentration at the source (at $x = y = z = 0$) [mg/L]
- v = retarded seepage velocity [m/sec]
- k = overall first order bio-decay rate [1/day]
- α_x = longitudinal dispersivity [m] ($\alpha_x = x/10$)
- α_y = lateral dispersivity [m] ($\alpha_y = x/30$)
- α_z = vertical dispersivity [m] ($\alpha_z = x/200$)
- x, y, z = spatial coordinates [m]
- t = time [day]
- x = distance along the centerline to POE from the downgradient edge of dissolved-plume, source zone, or source well [m]
- W_{gw} = groundwater mixing zone width [m]
- δ_{gw} = groundwater mixing zone thickness [m]
- DAF = C_o/C

Source: Domenico, P.A. and F.W. Schwartz, 1990, *Physical and Chemical Hydrogeology*. John Wiley and Sons, NY, 824 p. (Eqn. 17.21)

At the centerline, for steady-state (after a long time) the concentration can be obtained by setting $y = 0, z = 0$, and $x \ll v \times t$ as:

$$\frac{C(x)}{C_o} = \exp \left[\frac{x}{2\alpha_x} \left[1 - \sqrt{1 + \frac{4k\alpha_x}{v}} \right] \right] \times \operatorname{erf} \left[\frac{W_{gw}}{4\sqrt{\alpha_y x}} \right] \times \operatorname{erf} \left[\frac{\delta_{gw}}{2\sqrt{\alpha_z x}} \right]$$

At the centerline, for steady-state the concentration without decay can be obtained by setting $y = 0, z = 0, x \ll vt$, and $\lambda = 0$ as:

$$\frac{C(x)}{C_o} = \operatorname{erf} \left[\frac{W_{gw}}{4\sqrt{\alpha_y x}} \right] \times \operatorname{erf} \left[\frac{\delta_{gw}}{2\sqrt{\alpha_z x}} \right]$$

Retarded seepage velocity v is given by the equation:

$$v = \frac{U_{gw}}{R \times \theta_T}$$

Where:

- U_{gw} = groundwater darcy velocity [m/s]
- R = retardation factor in the saturated zone [--]
- θ_T = Total soil porosity in the saturated zone
- i = hydraulic gradient [--]

A5.3.2 SOIL TO GROUND WATER LEACHING FACTOR

$$LF_{SW} = \frac{1}{DAF_{Summers} \times K_{Water-soil}}$$

[(mg/L-H₂O)/(mg/kg-soil)]

$$DAF_{Summers} = 1 + \frac{U_{gw} \times \delta_{gw}}{I \times W_{gw}} \quad (\text{The Summers Model})$$

$$K_{Water-soil} = \frac{\theta_{ws} + K_d \rho_s + H \times \theta_{as}}{\rho_s}$$

Where:

- $DAF_{Summers}$ = Dilution attenuation factor in the mixing zone [--]
- $K_{Water-soil}$ = Water-soil partitioning coefficient [(mg/kg-soil)/(mg/L-H₂O)]
- ρ_s = Dry soil bulk density [g-soil/cm³-soil]
- θ_{ws} = Volumetric water content in vadose zone soils [cm³-H₂O/cm³-soil]
- K_d = $f_{oc} \times K_{oc}$
= Chemical-specific soil-water sorption coefficient [cm³-H₂O/g-soil]
- H = Chemical-specific Henry's Law constant [(L-H₂O)/(L-air)]
- θ_{as} = Volumetric air content in the vadose zone soils [cm³-air/cm³-soil]
- U_{gw} = Groundwater Darcy Velocity [cm/yr]
- δ_{gw} = Groundwater mixing zone thickness [cm]
- I = Infiltration rate of water through soil [cm/year]
- W_{gw} = Groundwater mixing zone length [cm]

Source: U.S. Environmental Protection Agency, 1996

A.5.3.3 SOIL SATURATION LIMIT

C_s^{SAT} : Soil concentration at which dissolved pore water and vapor phases become saturated [(mg/kg-soil)]

$$C_s^{sat} = \frac{S}{\rho_s} \times [H \times \theta_{as} + \theta_{ws} + K_d \rho_s]$$

Where:

- S = Pure component solubility in water [mg/L-H₂O]
- ρ_s = Dry soil bulk density [g-soil/cm³-soil]
- H = Chemical-specific Henry's Law constant [(L-H₂O)/(L-air)]
- θ_{as} = Volumetric air content in the vadose zone soils [cm³-air/cm³-soil]
- θ_{ws} = Volumetric water content in vadose zone soils [cm³-H₂O/cm³-soil]
- K_d = $f_{oc} \times K_{oc}$
= Chemical-specific soil-water sorption coefficient [cm³-H₂O/g-soil]

Source: ASTM E1739-95

A5.3.4 SOIL AND GROUND WATER CONCENTRATION FOR GROUND WATER PROTECTION

$$\text{Allowable soil concentration at the source} = \text{Target groundwater concentration at the POE} \times \frac{DAF_{POE}}{LF_{SW}} \times DAF_{unsat}$$

$$\text{Allowable groundwater concentration at the source} = \text{Target groundwater concentration at the POE} \times DAF_{POE}$$

$$\text{Allowable groundwater concentration at the POC} = \text{Target groundwater concentration at the POE} \times \frac{DAF_{POE}}{DAF_{POC}}$$

Where:

POE = Point of exposure

POC = Point of compliance

DAF_{POE} = Dilution Attenuation Factor (in the saturated zone) between the point of exposure and the source

DAF_{POC} = Dilution Attenuation Factor (in the saturated zone) between the point of compliance and the source

DAF_{unsat} = Dilution Attenuation Factor (in the vadose zone) between water table and soil source

LF_{SW} = Dry soil leaching factor

Additional relationships used in the calculation of allowable soil and groundwater concentration with chemical degradation:

$$\text{First order decay rate} = \frac{0.693}{\text{Half - Life}}$$

$$\text{Retardation Factor for Organics in saturated zone} = 1 + \left(\frac{\rho_{ss} \times K_{ds}}{\theta_{TS}} \right)$$

$$\text{Retardation Factor for Metals in saturated zone} = 1 + \left(\frac{\rho_{ss} \times K_{ds}}{\theta_{TS}} \right)$$

Where:

ρ_{ss} = Dry soil bulk density of the saturated zone soil [g-soil/cm³-soil]

K_{ds} = Chemical-specific soil-water distribution coefficient in the saturated zone [mL/g]

= $K_{oc} \times f_{oc_s}$

f_{oc_s} = fractional organic carbon content in the saturated zone [--]

θ_{TS} = Total soil porosity in the saturated zone [cm³/cm³-soil]

A5.4 VOLATILIZATION FACTORS AND EFFECTIVE DIFFUSION COEFFICIENTS

A5.4.1 VOLATILIZATION FACTORS

A5.4.1.1 VF: Volatilization Factor from Surface Soil to Outdoor (ambient) Air [(m³-air)/(kg-soil)]

$$VF = Q/C \times \frac{(3.14 \times D_A \times \tau)^{1/2}}{(2 \times \rho_s \times D_A)} \times 10^{-4}$$

Where:

$$D_A = \frac{(\theta_{as}^{10/3} \times D^a \times H + \theta_{ws}^{10/3} \times D^w) / \theta_T^2}{\rho_s \times K_d + \theta_{ws} + \theta_{as} \times H}$$

Where:

- Q/C = Inverse of the mean concentration at the center of square source [cm²/s]
- D_A = Apparent diffusivity [cm²/s]
- τ = Averaging time for vapor flux [s]
- ρ_s = Dry soil bulk density [g of soil/cm³ of soil]
- K_d = Chemical-specific solid-water sorption coefficient [cm³ of H₂O/g of soil]
- D^a = Chemical-specific diffusion coefficient in air [cm²/s]
- D^w = Chemical-specific diffusion coefficient in water [cm²/s]
- θ_T = Total soil porosity in the impacted zone [cm³/cm³ of soil]
- θ_{as} = Volumetric air content in the vadose zone soils [cm³ of air/cm³ of soil]
- θ_{ws} = Volumetric water content in the capillary fringe soils [cm³ of H₂O/cm³ of soil]
- H = Chemical-specific Henry's Law constant [(L-H₂O)/(L-air)]
- W = Width of source area parallel to wind, or groundwater flow direction [cm]
- 10^{-4} = Conversion factor [m²/cm²]

Source: U.S. Environmental Protection Agency, 1996

A5.4.1.2 *PEF* : Particulate Emission Factor [(m³-air)/(kg-soil)]

$$PEF = Q/C \times \frac{3600}{0.036 \times (1 - V) \times (U_m/U_t)^3 \times F(x)}$$

Where:

- Q/C = Inverse of the mean concentration at the center of square source [(g/m²-s)/(kg/m³)]
- V = Fraction of vegetative cover [-]
- U_m = Mean annual windspeed [m/s]
- U_t = Equivalent threshold value of windspeed at 7 m [m/s]
- $F(x)$ = Function dependent on U_m/U_t derived using Cowherd *et al.* 1985 [-]
- 0.036 = Empirical constant [m²-hr/g]

Source: U.S. Environmental Protection Agency, 1996

A5.4.2 EFFECTIVE DIFFUSION COEFFICIENTS

A5.4.2.1 Effective Diffusion Coefficient In Soil

D_s^{eff} : effective diffusion coefficient in soil based on vapor-phase concentration [cm^2/s]

$$D_s^{eff} = D^a \times \frac{\theta_{as}^{3.33}}{\theta_T^{2.0}} + D^w \times \frac{1}{H} \times \frac{\theta_{ws}^{3.33}}{\theta_T^{2.0}}$$

Where:

- D^a = Chemical-specific diffusion coefficient in air [cm^2/s]
- D^w = Chemical-specific diffusion coefficient in water [cm^2/s]
- θ_{as} = Volumetric air content in capillary fringe soils [$\text{cm}^3\text{-air}/\text{cm}^3\text{-soil}$]
- θ_{ws} = Volumetric water content in capillary fringe soils [$\text{cm}^3\text{-H}_2\text{O}/\text{cm}^3\text{-soil}$]
- θ_T = Total soil porosity in the impacted zone [$\text{cm}^3/\text{cm}^3\text{-soil}$]
- H = Chemical-specific Henry's Law constant [(L-H₂O)/(L-air)]

A5.4.2.2 Effective Diffusion Coefficient Between Ground Water and Surface Soil

D_{ws}^{eff} : effective diffusion coefficient between ground water and surface soil [cm^2/s]

$$D_{ws}^{eff} = L_{TGW} \times \left[\frac{h_{cap}}{D_{cap}^{eff}} + \frac{(L_{TGW} - h_{cap})}{D_s^{eff}} \right]^{-1}$$

Where:

- h_{cap} = Thickness of capillary fringe [cm]
- D_{cap}^{eff} = Effective diffusion coefficient through capillary fringe [cm^2/s]
- D_s^{eff} = Effective diffusion coefficient in soil based on vapor-phase concentration [cm^2/s]
- L_{TGW} = Source-building separation [cm]

<p>A5.4.2.3 Effective Diffusion Coefficient In Capillary Fringe Soil</p>	<p>A5.4.2.4 Effective Diffusion Coefficient In Foundation/Wall Cracks</p>
<p>D_{cap}^{eff}: effective diffusion coefficient for the capillary fringe [cm²/s]</p> $D_{cap}^{eff} = D^a \times \frac{\theta_{acap}^{3.33}}{\theta_T^{2.0}} + D^w \times \frac{1}{H} \times \frac{\theta_{wcap}^{3.33}}{\theta_T^{2.0}}$ <p>Where:</p> <p>D^a = Chemical-specific diffusion coefficient in air [cm²/s] D^w = Chemical-specific diffusion coefficient in water [cm²/s] θ_{acap} = Volumetric air content in capillary fringe soils [cm³-air/cm³-soil] θ_{wcap} = Volumetric water content in capillary fringe soils [cm³-H₂O/cm³-soil] θ_T = Total soil porosity [cm³/cm³-soil] H = Chemical-specific Henry's Law constant [(L-H₂O)/(L-air)]</p> <p>Source: ASTM E1739-95</p>	<p>D_{crack}^{eff}: effective diffusion coefficient through foundation cracks [cm²/s]</p> $D_{crack}^{eff} = D^a \times \frac{\theta_{acrack}^{3.33}}{\theta_T^{2.0}} + D^w \times \frac{1}{H} \times \frac{\theta_{wcrack}^{3.33}}{\theta_T^{2.0}}$ <p>Where:</p> <p>D^a = Chemical-specific diffusion coefficient in air [cm²/s] D^w = Chemical-specific diffusion coefficient in water [cm²/s] θ_{acrack} = Volumetric air content in foundation/wall cracks [cm³-air/cm³-total volume] θ_{wcrack} = Volumetric water content in foundation/wall cracks [cm³-H₂O/cm³-total volume] θ_T = Total soil porosity [cm³/cm³-soil] H = Chemical-specific Henry's Law constant [(L-H₂O)/(L-air)]</p>

A5.4.2.5 WATER CONTENT IN SOIL IN THE CAPILLARY FRINGE

$$\theta_{wcap} = \theta_r + \frac{\theta_T - \theta_r}{[1 + (\alpha h)^N]^M}$$

- θ_{wcap} = Water content in the capillary fringe zone soil
[cm³ water/cm³ soil]
- θ_r = Residual soil water content [cm³ water/cm³ soil]
- θ_{Tcap} = Total porosity of soil in the capillary fringe zone
[cm³ voids/cm³ soil]
- α = Point of inflection in the water retention curve where
d θ_w /dh is maximal [1/cm]
- h = Air-entry pressure head [cm]
= 1/ α and assumed to be positive
- N = van Genuchten curve shape parameter [-]
- M = 1-(1/N)

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**APPENDIX A-6 METHODOLOGY AND EXAMPLE
CALCULATION FOR REMEDIAL ACTION TARGET
LEVELS**

In the risk evaluation process for each receptor the cumulative risk and HI at a site for all COCs and complete ROEs (except ingestion of water) should not exceed 1×10^{-5} and 1 respectively. This appendix describes the default methodology used by DEQ to apportion risk and derive remedial action target level concentrations for COCs in various media at sites where the risk or hazard is estimated to exceed the acceptable target risk level or acceptable hazard index.

The default method for developing target levels can be summarized by the following steps:

Step 1: Based on complete or potentially complete routes of exposure identified earlier and estimated representative concentrations, calculate the corresponding risk ($Risk_{i,j}^{rep}$) and hazard quotient ($HQ_{i,j}^{rep}$) for each chemical (i) for each complete pathway (j). Results can be used to generate a matrix of risk and HQ values as shown in Table A-1 below.

Table A-1. Example Matrix for Calculation of Remedial Action Target Levels

COC	Pathway						Cumulative		Number	
	Pathway 1		Pathway 2		Pathway 3		Risk	HI	Carc.	Non-carc.
	Risk	HQ	Risk	HQ	Risk	HQ				
C1	X	N/A	X	N/A	-	N/A	SUM	SUM	2	0
C2	N/A	X	N/A	X	N/A	X	SUM	SUM	0	3
C3	N/A	X	-	X	N/A	X	SUM	SUM	0	3
C4	X	N/A	X	N/A	X	N/A	SUM	SUM	3	0
C5	X	X	N/A	X	N/A	X	SUM	SUM	1	3
Site Cumulative Risk							Risksite = SUM(SUM)	HI _{site} = SUM(SUM)	6	9

X: Pathway complete.

N/A: Not applicable because there is no relevant toxicity data or physical-chemical property.

- : Not calculated because there was no entry under representative concentrations. This could mean that the chemical is not a COC for the pathway being evaluated based on release history or based on site characterization data.

Step 2: Calculate cumulative risk and HI at the site (site risk and site HI).

$$Risk_{site} = \sum_{i=1}^{n_c} \sum_{j=1}^{m_i} Risk_{i,j}$$

$$HI_{site} = \sum_{i=1}^{n_{nc}} \sum_{j=1}^{m_i} HQ_{i,j}$$

Where:

Risk_{i,j} = Risk from exposure to chemical i through pathway j
 HQ_{i,j} = Hazard quotient for exposure to chemical i through pathway j
 m_i = Number of complete pathways for chemical i (the suffix to m indicates that the number of complete pathways can be different for different chemicals)
 n_c = Number of carcinogenic chemicals at the site
 n_{nc} = Number of non-carcinogenic chemicals at the site

If the cumulative risk and HI for all the receptors at the site are below the acceptable levels, the site does not require the development of RATL. Site closure may be appropriate if other required regulatory issues have been resolved.

Step 3: Determine the number of chemical-pathway combinations (for carcinogens and non-carcinogens separately) at the site.

Number of chemical-pathway combinations for carcinogens,

$$N_c = \sum_{i=1}^{n_c} \sum_{j=1}^{m_i} p_{i,j}$$

Number of chemical-pathway combinations for non-carcinogens,

Where:

$$N_{nc} = \sum_{i=1}^{n_{nc}} \sum_{j=1}^{m_i} p_{i,j}$$

p_{i,j} = Complete pathway for chemical i and pathway j
 m_i = Number of complete pathways for chemical i (the suffix to m indicates that the number of complete pathways can be different for different chemicals)
 n_c = Number of carcinogenic chemicals at the site
 n_{nc} = Number of non-carcinogenic chemicals at the site

Note that some chemicals show both carcinogenic and non-carcinogenic toxicity and should be counted in both categories. For example, chemical C5 in the example above has three complete pathways for the non-carcinogenic effects and one pathway for the carcinogenic effects.

Step 4: Based on equal apportioning of target cumulative risk and HI, compute allocated risk and HQ contribution by chemical i through pathway j using:

$$Risk_{i,j}^{allocated} = \frac{1 \times 10^{-5}}{N_c}$$

$$Risk_{i,j}^{allocated} = \frac{1}{N_{nc}}$$

Step 5: Estimate the risk reduction factor (RRF) in risk or HQ required so the contribution by chemical i acting through pathway j is equal to the allocated risk or allocated HQ.

Risk reduction factor for chemical i acting through pathway j:

$$RRF_{i,j} = \frac{Risk_{i,j}^{rep}}{Risk_{i,j}^{allocated}}$$

Hazard quotient reduction factor for chemical i acting through pathway j:

$$HQRF_{i,j} = \frac{HQ_{i,j}^{rep}}{HQ_{i,j}^{allocated}}$$

Step 6: Calculate the target level for chemical i acting through pathway j.

For carcinogens:

$$C_{i,j}^{allowable} = \frac{C_{i,j}^{rep}}{RRF_{i,j}}$$

For non-carcinogens:

$$C_{i,j}^{allowable} = \frac{C_{i,j}^{rep}}{HQRF_{i,j}}$$

If a chemical has $C_{i,j}^{allowable}$ based on carcinogenic and non-carcinogenic toxicity, the applicable RATL for that chemical should be the lower of the two allowable concentrations.

Developing Target Levels: Example

The following is an example of target level calculations described in above. Table A-2 presents fictitious representative concentrations for each of five chemical and three pathways, two of which are soil and one ground water.

Table A-2. Fictitious Representative Concentrations Used in Target Level Calculation Example

COC	Pathway		
	P1(mg/kg)	P2 (mg/kg)	P3 (mg/l)
C1	1	2	--
C2	2	4	2
C3	3	6	3
C4	4	8	4
C5	5	10	5

Step 1: Use these representative concentrations to calculate risk and HQ for each chemical and pathway the chemical acts through. The resulting matrix of risk and HQ values is shown in Table A-3.

Table A-3. Example of Risk/COC/Pathway Matrix for Target Level Calculation

COC	Pathway						Cumulative		Number	
	Pathway 1		Pathway 2		Pathway 3		Risk	HI	Carc.	Non-carc.
	Risk	HQ	Risk	HQ	Risk	HQ				
C1	1E-5	N/A	2E-5	N/A	N/A	N/A	3E-5	N/A	2	0
C2	N/A	1	N/A	3	N/A	1	N/A	5	0	3
C3	N/A	1	-	1	N/A	3	N/A	5	0	3
C4	1E-5	N/A	1E-5	N/A	1E-5	N/A	3E-5	N/A	3	0
C5	2E-5	1	N/A	1	N/A	1	1E-5	3	1	3
Cumulative Site Risk							Risksite = 7E-5	HI _{site} = 13	6	9

N/A: Not applicable because there is no relevant toxicity data or physical-chemical property or because there was no entry under representative concentrations. This could mean that the chemical is not a COC for the pathway being evaluated based on release history or based on site characterization data.

-: Not calculated because there was no entry under representative concentrations. This could mean that the chemical is not a COC for the pathway being evaluated based on release history or based on site characterization data.

Step 2: Calculate the cumulative site risk and HI for all chemicals and pathways for a given receptor (in this case the risk and HI are 7×10^{-5} and 13, respectively).

Step 3: Determine the number of chemical-pathway combinations (for carcinogens and non-carcinogens separately) at the site. In this example the number of chemical-pathway combinations for carcinogens is six and the number of chemical-pathway combinations for non-carcinogens is nine.

Step 4: Based on equal apportioning of the target cumulative risk and HI, calculate the allocated risk and HQ contribution by chemical *i* through pathway *j*.

Step 5: Estimate the RRF in risk or HQ required so that the contribution by a given chemical acting through a particular pathway is equal to the allocated risk or HQ. Risk reduction factor for chemical *i* acting through pathway *j*:

$$Risk_{i,j}^{allocated} = \frac{1 \times 10^{-5}}{6} = 1.67 \times 10^{-6}$$
$$HQ_{i,j}^{allocated} = \frac{1}{9} = 0.111$$

$$RRF_{i,j} = \frac{Risk_{i,j}^{rep}}{Risk_{i,j}^{allocated}}$$

Hazard quotient reduction factor for chemical *i* acting through pathway *j*:

$$HQRF_{i,j} = \frac{HQ_{i,j}^{rep}}{HQ_{i,j}^{allocated}}$$

The calculations of the RFs for the example are presented in Table A-4. At actual sites the reduction factors are rarely uniform as in the example.

Table A-4. Reduction Factor Example for Target Level Calculations

COC	Pathway					
	Pathway 1		Pathway 2		Pathway 3	
	RRF	HQRF	RRF	HQRF	RRF	HQRF
C1	1E-5/1.67E-6 = 5.99	N/A	2E-5/1.67E-6 = 11.98	N/A	-	N/A
C2	N/A	1/0.111 = 9.0	N/A	3/0.111 = 27.0	N/A	1/0.111 = 9.0
C3	N/A	1/0.111 = 9.0	-	1/0.111 = 9.0	N/A	3/0.111 = 27.0
C4	1E-5/1.67E-6 = 5.99	N/A	1E-5/1.67E-6 = 5.99	N/A	1E-5/1.67E-6 = 5.99	N/A
C5	2E-5/1.67E-6 = 11.98	1/0.111 = 9.0	N/A	1/0.111 = 9.0	N/A	1/0.111 = 9.0

N/A: Not applicable because there is no relevant toxicity data or physical-chemical property or because there was no entry under representative concentrations. This could mean that the chemical is not a COC for the pathway being evaluated based on release history or based on site characterization data.

- : Not calculated because there was no entry under representative concentrations. This could mean that the chemical is not a COC for the pathway being evaluated based on release history or based on site characterization data.

Step 6: Calculate the target level for a chemical acting through a given pathway.
For carcinogens:

$$C_{i,j}^{allowable} = \frac{C_{i,j}^{rep}}{RRF_{i,j}}$$

For non-carcinogens:

$$C_{i,j}^{allowable} = \frac{C_{i,j}^{rep}}{HQRF_{i,j}}$$

The resulting RATL calculations, carcinogenic and/or non-carcinogenic, for the example are presented in Table A-5. The RATL concentrations are presented in bold.

Table A-5. Example RATL Concentrations for Target Level Calculations

COC	Pathway					
	Pathway 1 (mg/kg)		Pathway 2 (mg/kg)		Pathway 3 (mg/l)	
	RATLc	RATLnc	RATLc	RATLnc	RATLc	RATLnc
C1	$1/5.99 =$ 0.17	N/A	$2/11.98 =$ 0.17	N/A	-	N/A
C2	N/A	$2/9.0 =$ 0.222	N/A	$4/27.0 =$ 0.148	N/A	$2/9.0 =$ 0.222
C3	N/A	$3/9.0 =$ 0.333	-	$6/9.0 = 0.667$	N/A	$3/27.0 =$ 0.111
C4	$4/5.99 =$ 0.67	N/A	$8/5.99 = 1.34$	N/A	$4/5.99 =$ 0.67	N/A
C5	$5/11.98 =$ 0.42	$5/9.0 =$ 0.555	N/A	$10/9.0 = 1.11$	N/A	$5/9.0 =$ 0.555

N/A: Not applicable because there is no relevant toxicity data or physical-chemical property or because there was no entry under representative concentrations. This could mean that the chemical is not a COC for the pathway being evaluated based on release history or based on site characterization data.

∴: Not calculated because there was no entry under representative concentrations. This could mean that the chemical is not a COC for the pathway being evaluated based on release history or based on site characterization data.

In this example, for chemical C5 and pathway P1, both carcinogenic and non-carcinogenic RATLs are calculated. The lower of the two, 0.42 mg/kg, (the carcinogenic RATL, would be used.

Appendix A-7: Evaluation of the Vapor Intrusion Pathway

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A7.1 BACKGROUND

A potentially complete exposure pathway at petroleum release sites is vapor intrusion (VI). The VI pathway involves exposure via inhalation of vapors emitted from impacted soil or ground water which are subsequently transported to indoor spaces. Figure A7-1 shows the general conceptual model that is assumed for the VI pathway at petroleum release sites.

This appendix describes a VI pathway specific evaluation process and provides general guidance on soil vapor and indoor air sampling and data interpretation for use within the risk-based corrective action process. The focus of this appendix is on indoor inhalation only since experience suggests that outdoor inhalation from subsurface contamination rarely results in unacceptable risk. It is assumed that any imminent threats to human health via explosive levels of vapors have been mitigated prior to this evaluation. The state of the science regarding the evaluation of VI at petroleum release sites is rapidly evolving and this guidance will be modified in the future to reflect this evolution.

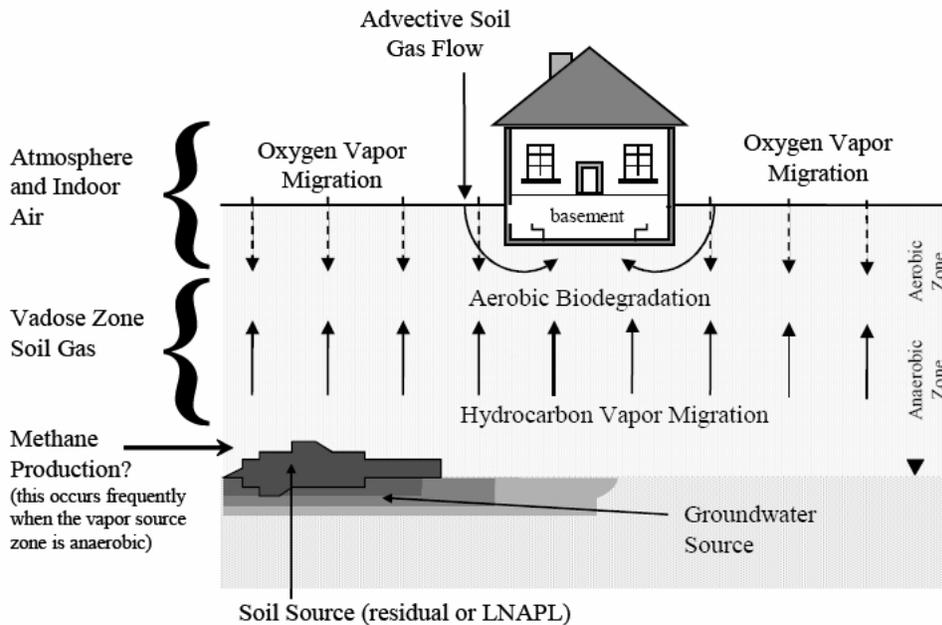


Figure A7-1. Conceptual Model of the Vapor Intrusion Pathway (taken from API, 2005)

A7.2 EVALUATION PROCESS FOR THE VAPOR INTRUSION PATHWAY

The evaluation of the VI pathway is an iterative process that is dependant on:

- development and validation of a sound site conceptual model,
- collection of appropriate characterization data,
- evaluation of the data to determine whether the pathway is complete or, if incomplete, may be excluded from further consideration, and
- calculation of risk if the pathway is complete.

Figure A7-2 is a flowchart of a step-by-step approach to evaluating the VI pathway. While the flowchart outlines a stepwise process it also provides several places where, depending on the type, site-specificity, and quality of characterization data collected, a determination that the VI pathway is incomplete can be made, thus completing the evaluation. The criteria applied to make this determination vary with the type and quality of available data. These criteria are described in more detail below.

Only chemicals of interest (COI) at the site that are volatile should be considered during evaluation of the VI pathway. Non-volatile chemicals are commonly considered those chemicals with a dimensionless Henry's Law constant of less than or equal to 1×10^{-4} and a molecular weight exceeding 200 (EPA, 1996). Of the COI typically considered at petroleum release sites those which meet this non-volatility criteria include the polynuclear aromatic hydrocarbons (PAH) benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, and fluoranthene.

Using soil and groundwater data, many of the remaining PAH chemicals that are considered volatile will often be eliminated from further consideration during the initial screening evaluation described below.

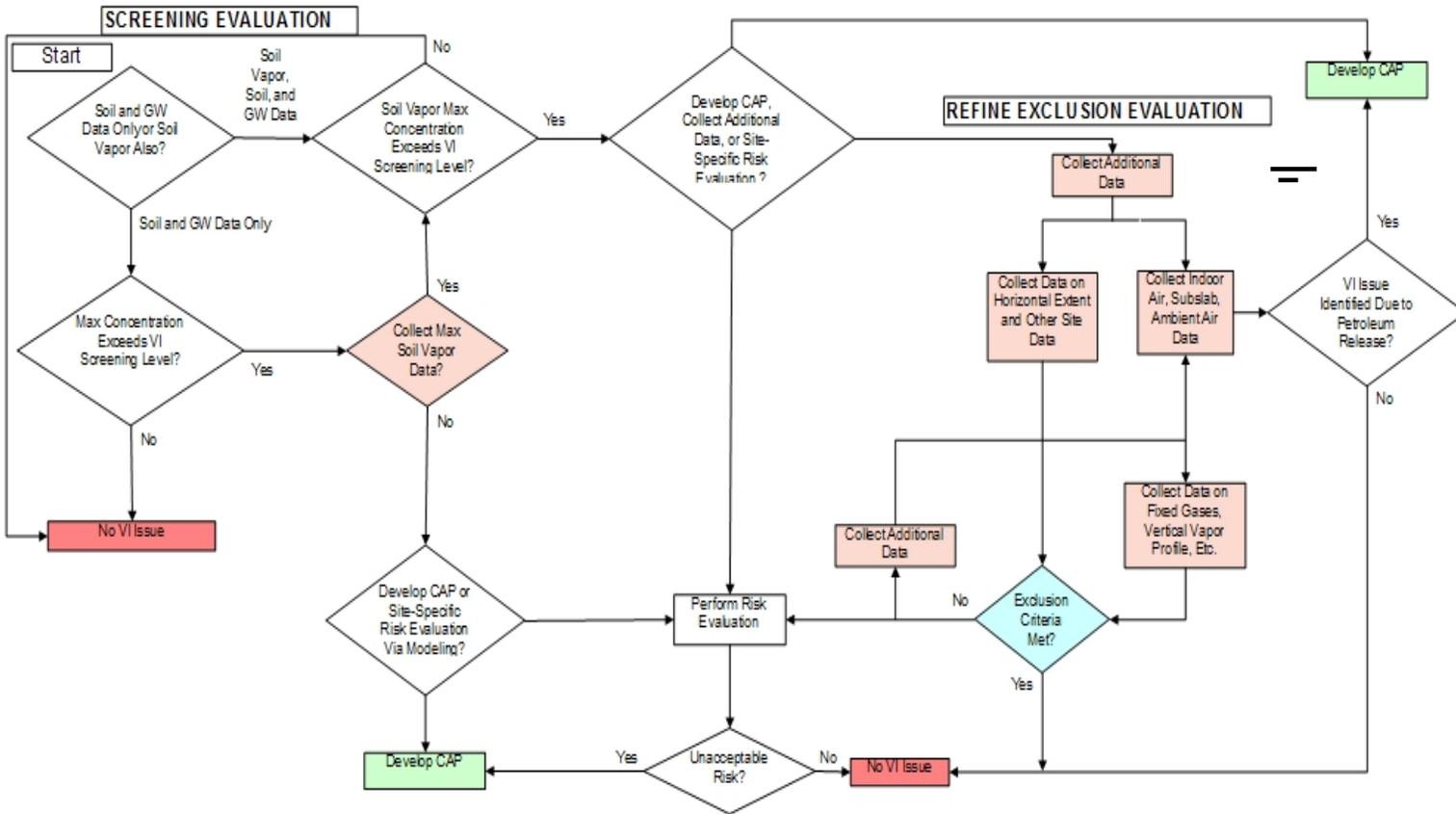


Figure A7-2. Flowchart for Evaluation of the Vapor Intrusion Pathway

A.7.2.1 Screening Evaluation

The screening evaluation uses soil, ground water, or soil vapor chemical data for the COI that are collected to be representative of the highest concentrations associated with the petroleum release source areas. These data are typically collected early in the site characterization process. The concentrations are compared to associated media-specific and pathway-specific screening levels. These screening levels, presented in Table A7-1, are based on an assumption of unrestricted land use at the site and close proximity of the contamination to potential receptors. The screening levels do not take into account site-specific information such as the spatial relationship of the contamination to potential receptors, current and assumed future land use, building characteristics or potential attenuation of petroleum release chemicals via biodegradation.

Maximum soil and/or ground water data only: If **only** maximum soil and/or ground water data are available the following evaluation outcomes are possible:

1. No screening levels are exceeded. **NO VI ISSUE.**
2. Concentrations only exceed the screening levels for non-VI pathways.
NO VI ISSUE.
3. Concentrations only exceed the screening levels for VI pathways.
4. Concentrations exceed the screening levels for both VI and non-VI pathways.

In the case of outcomes 3 and 4, VI is a potentially complete pathway. Next step options include:

- a) Collect maximum concentration soil vapor data appropriate for comparison to soil vapor screening levels;
- b) Develop a corrective action plan to clean up to screening levels or otherwise mitigate VI risk;
or
- c) Collect additional data to conduct a site-specific risk evaluation. The site-specific evaluation could result either in exclusion of the VI pathway as a complete pathway (See Site Specific Evaluation Section below) or inclusion and an evaluation of the level of risk.

Maximum soil, ground water AND vapor data: If maximum soil, ground water, and soil vapor data are all available several scenarios with respect to the VI pathway are possible:

- Soil and/or ground water data exceed VI screening levels but soil vapor does not. The soil vapor data is given preference (assuming it was representative of maximum concentrations), the VI pathway is considered incomplete, and there is **NO VI ISSUE**. Further consideration of other complete or potentially complete pathways of concern still should be carried out.
- Soil, ground water and soil vapor data all exceed VI pathway screening levels. Options include development of a CAP, collection of additional site characterization data to refine the evaluation regarding the existence of a VI issue, or performance of a site specific risk evaluation.

- Soil, ground water and soil vapor data do not exceed VI pathway screening levels. NO VI ISSUE exists.

A.7.2.2 Refined Exclusion Criteria

If the potential for a VI issue exists after the screening evaluation and additional site characterization data will be collected, the following types of information are most valuable in refining the evaluation:

- Physical Site Data. Includes the nature and extent of surface and subsurface features (natural or man-made), in relation to vapor sources, which may enhance or impede the flow of chemical vapors or oxygen needed for biodegradation.
- Soil Properties Data – site-specific information on soil properties to calculate site-specific soil gas screening levels.
- Soils/GW/Vapor/NAPL Data. Characterize the horizontal and vertical extent of vapor sources.
- Structure Data. Includes building construction (slab on grade, basement, or crawl space), building condition, HVAC system design and operation, and location of occupied spaces in relation to contamination distribution.
- Current and Future Land Use. Knowledge and assumptions about current and future use of both existing structures and the delineated vapor sources on the property or adjacent properties or structures potentially impacted by the release.

If the above information demonstrates each criterion in a-g below, a VI issue does not exist:

- a) No fractured rock or subsurface geology which provides the potential for enhanced vapor transport is present between delineated vapor sources and existing structures within 50 feet of the ground surface;
- b) No reasonably identifiable preferential pathways such as utility trenches backfilled with highly permeable material or sumps connected to existing structures exist between delineated vapor sources and the existing structures;
- c) No low permeability layers exist (either at the surface or in the subsurface) connected to existing structures between the delineated vapor sources and the structures that allow enhanced transport of vapors without degradation;
- d) No exceedance of vapor intrusion pathway screening levels in groundwater, soil or soil gas within 50 feet of existing structures;
- e) Delineated ground water plume sources are determined to be stable or unlikely to expand within 50 feet of an existing structure;
- f) No non-aqueous phase liquid (NAPL) vapor sources exist within 100 feet of existing structures; and

- g) Current and reasonably likely future land use (including the configuration and use of existing structures) at the site is assumed to be unchanged and no development is planned within 50 feet of delineated vapor sources.

Critical distances specified in the American Society of Testing and Materials (ASTM) in their 2010 *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions* (ASTM, 2010) can be modified based on the environmental professional's evaluation of relevant factors. These factors include but are not limited to:

- The completeness of source delineation
- Amount of oxygen in the soil
- The physical setting of the structure and site
- Other chemical contaminants that may impact oxygen availability for biodegradation

The distance criteria specified in a-g above may be adjusted based on these types of site-specific factors when supported with adequate documentation.

If the more detailed exclusion evaluation described above results in a determination that a VI issue likely exists because one or more of the criteria are not met, additional data collection to further refine the analysis of those criteria may be appropriate. This commonly involves the collection of additional soil vapor data. Several of the criteria listed above have the potential to enhance the transport of soil vapor (fractured rock, preferential pathways, low permeability layers). Vapor samples may be taken from targeted locations at the site in order to resolve these issues. For example, fractured rock may be overlain by a thin layer (< 10 feet) of soil. If appropriate soil vapor samples taken near the soil-rock interface result in acceptable concentrations, the potential impact of the shallow presence of the fractured rock may be discounted. A similar situation may occur with impacted shallow ground water (< than 50 feet bgs) that may be resolved with more detailed soil vapor assessment. Collection of multi-depth vertical soil vapor samples may demonstrate adequate attenuation of contamination.

At sites where the current and reasonably likely future land use is commercial/industrial the screening levels for deep soil vapor for commercial land use provided in Table A-7 may be applied. IDEQ will require an Environmental Covenant, or other land use restriction, for any site where an assumption is made that the likely future land use is commercial/industrial. IDEQ may require restrictions on land use within undeveloped delineated vapor source areas depending on vapor concentrations and assumed future land use in these areas.

For delineated vapor source areas without buildings that have demonstrated no current VI risk to existing structures but whose future land use condition with respect to buildings and land use is uncertain the collection of detailed soil vapor data may show that NO VI ISSUE exists. The data and analysis used to make this determination is as follows:

- Collection of vertical and horizontal profiles of vapor chemical concentrations and fixed gases (oxygen, carbon dioxide, methane), determination of soil type, and soil organic carbon at critical locations in the delineated vapor source areas. The goals are: (1) to establish that adequate attenuation of vapors is occurring and will continue to occur; and (2) to prevent unacceptable exposure to hypothetical future receptors.

The data should be graphically displayed to demonstrate that the absence or reduced concentrations of petroleum hydrocarbons in shallow soil gas is supported by evidence of the aerobic conditions, e.g. high concentrations of oxygen and low or nondetect concentrations of volatile COI, needed for degradation. The presence of the anaerobic zone, e.g. high levels of methane and/or carbon dioxide correlate to higher concentrations of volatile COI where degradation is not occurring should also be displayed, if possible (API, 2005).

If site-specific data shows that biodegradation is attenuating soil gas concentrations to vapor screening levels as detailed in a – c below, then NO VI ISSUE exists in this area and no further sampling is required:

- a. Total concentrations of petroleum COI in groundwater are below 1,000 µg/L;
- b. Concentrations of oxygen in the unsaturated zone above an anaerobic zone are sufficient in concentration (10 percent or greater) throughout an adequate thickness (5 to 10 feet) of clean soil (vapor concentrations less than screening levels) to continue to support biodegradation' and
- c. Depth to groundwater does not vary annually in a manner which would result in an inadequate thickness of clean soil.

This data and analysis may also be used to demonstrate that vapor sources are attenuated to screening levels by biodegradation in close proximity to existing structures.

If it is concluded that a VI issue still may exist following this level of site characterization, the following options are available:

- Develop a risk management strategy to address the VI pathway through a comprehensive corrective action plan for the site. The plan may include, as appropriate, implementation of activity and use limitations through an environmental covenant.
- Further evaluate the VI pathway by collecting and evaluating subslab vapor, and ambient air data prior to performing a site-specific risk reevaluation per Section A.7.2.3. This includes chemical concentration data for each structure of concern, an inventory of potential indoor and outdoor sources of the chemicals of concern, and an assessment of background concentrations. See Section A.7.2.3 for details regarding the interpretation of this data.
- Perform a site-specific risk evaluation per Section A.7.2.3.

Table A7-1. Screening Level Concentrations for Soil, Groundwater, and Soil Vapor.

CHEMICAL	SOIL (mg/kg)			GROUNDWATER (mg/L)		DEEP SOIL VAPOR (ug/m3) (>3- 5 feet bgs)	
	Vapor Intrusion	Direct Contact	Groundwater Protection	Vapor Intrusion	Ingestion	Unrestricted Use Vapor Intrusion	Commercial/Industrial Vapor Intrusion
Benzene	0.091	8.5	0.018	0.044	0.005	31	160
Toluene	305	5680	4.9	382	1	520000	2200000
Ethylbenzene	0.071	36	10	0.11	0.700	97	490
Xylenes	1.7	3480	148	4.5	10	10000	44000
Naphthalene	0.078	50	5.2	0.102	0.21	7	36
MTBE	4.4	345	0.067	12	0.031	940	4700
1,2-Dichloroethane	0.03	3.4	0.011	0.074	0.005	9	47
Ethylene Dibromide	0.002	0.21	0.00014	0.004	0.00005	0.4	2
Acenaphthene	NA	2360	52	NA	0.626	NA	NA
Anthracene	NA	11,800	1040	NA	3.13	NA	NA
Benz(a)anthracene	7120	0.42	1.9	5.2	0.0001	0.9	11
Benzo(a)pyrene	1440	0.042	3.4	1.5	0.0002	0.09	1.1
Benzo(b)fluoranthene	908	0.42	0.75	1.7	0.0001	0.9	11
Benzo(k)fluoranthene	21,200	4.22	14	21	0.0008	0.9	11
Chrysene	480	41.9	33	2	0.008	9	110
Fluoranthene	NA	1570	364	NA	0.417	NA	NA
Fluorene	NA	1570	55	NA	0.417	NA	NA
Pyrene	NA	1180	359	NA	0.313	NA	NA

Values in bold are current Petro REM screening concentrations. Screening values for deep soil vapor are equivalent to USEPA Regional Screening Levels (EPA, 2010b) for residential and industrial ambient air times an attenuation factor of 100.

A.7.2.3 Site Specific Evaluation

A site specific VI pathway evaluation may include one or more of the following tasks:

- Collection of additional site characterization data (such as subslab vapor, indoor air, and ambient air data),
- Development of a refined site conceptual model (SCM) for VI, and
- Completion of a risk evaluation.

The elements of an SCM are discussed in detail in Section 4.1 of the guidance. These elements include descriptions of current and future land use and receptors, site conditions (surface, subsurface, and structural) that facilitate the transport of vapors to indoor air, and chemical concentrations for appropriate COI.

Upon completion of the SCM, the risk evaluation for VI can be completed in several ways depending on available data per the following:

VI Evaluation Using Soil/GW Data

These types of site chemical data can be used with fate and transport models to estimate the risks associated with VI, realizing the limitations of both the data and models. Use of this data presents certain limitations: (1) Equilibrium partitioning theory, used to convert soil and ground water concentrations into vapor concentrations, is typically found to overestimate these concentrations compared to field measured vapor data; and (2) The primary model currently available that can use soil and ground water data, the Johnson and Ettinger model (Johnson and Ettinger, 1991), is incorporated into the Idaho Petro REM software. This model does not accommodate the effects of biodegradation of petroleum chemicals, and therefore is limited in its predictive ability for these types of chemicals. The model also does not accommodate analysis of structures with crawl spaces or unfinished basements.

VI Evaluation Using Soil Vapor and Sub-Slab Vapor Data

Soil vapor and sub-slab vapor data can be used in several ways when evaluating VI risk and offers several advantages to the use of soil and ground water data, as follows:

- Since they are direct measures of vapor concentrations, the uncertainty associated with equilibrium partitioning based vapor concentration calculations is avoided. In addition, if collected appropriately they can reflect the effect of biodegradation.
- The data can be incorporated into the Johnson and Ettinger model as well as other models specific to the VI pathway, such as the BioVapor model (API, 2010) in order to predict indoor air chemical concentrations and risk. When the Johnson and Ettinger modeling option is used with soil, ground water, or soil vapor data it is recommended that the model default values for key parameters be retained with the exception that site-specific soil properties can be used.
- Subslab vapor data can be collected for existing structures and compared to screening levels based on the application of an attenuation factor of 0.1 to EPA Regional Screening Levels for ambient air.

- Subslab vapor data can be used along with indoor air and ambient air data (if an unacceptable risk is identified in indoor air) to develop site specific attenuation factors and soil vapor cleanup criteria.
- Deep vapor data (3-5 feet below ground surface) can be used to evaluate the potential VI risk in areas where future development of the site may be desired or expected. This data can also be compared with screening levels to delineate areas which may be candidates for activity and use limitations through the use of an environmental covenant.
- Along with data on oxygen, carbon dioxide, and methane in soil vapor another line of evidence for biodegradation of the petroleum vapors can be established.

VI Evaluation Using Indoor Air Data

Collection of this data provides the best opportunity for developing multiple lines of evidence in determining if VI presents a building-specific risk. Collection of indoor air data should, at a minimum be accompanied with concurrently collected outside ambient air, an inventory of potential indoor chemical sources, and information on building construction and heating/cooling system design and operation . In many cases, collection of subslab and subsurface soil vapor data can help determine if subsurface petroleum releases are contributing to VI risk. Specifically, deeper subsurface soil vapor data collected under the building may establish that chemical concentrations detected in the subslab originate, in whole or in part, from indoor air rather than from sub-surface contamination. .

Accessory measurements such as indoor/subslab pressure differentials and analysis of vapors for fixed gases will assist in data interpretation. The selection of ambient air sampling locations should attempt to take into account factors such as dominant wind direction, building characteristics, and the potential contributions from fueling/dispensing operations (at actively operating fueling facilities). In some cases sampling at multiple ambient air locations may be advisable.

Multiple scenarios are possible based on the results of the sampling program described above and comparison of measured indoor air, ambient air, and allowable risk-based air concentrations:

- 1) Indoor air (IA) < Ambient Air (AA) < Risk-Based Allowable Indoor Air (AIA)
The risk is **acceptable** and there is no indication of contribution from indoor/subsurface sources.
- 2) AA < IA < AIA
The risk is **acceptable** but there may be some potential indoor or subsurface sources.
- 3) IA < AIA < AA
The occurrence of this scenario is rare. The risk is **acceptable** and the likelihood of any indoor/subsurface contribution is low.
- 4) AIA < IA < AA

This is also a relatively unusual occurrence. Ambient sources appear to be the primary contributor to elevated indoor air concentrations with an unknown contribution from indoor/subsurface sources. The results of the indoor inventory and soil vapor concentrations may help evaluate the relative magnitude or contribution of each of these other two sources but it is unlikely that they contribute significantly to indoor air risk. The risk may be considered **acceptable** if subsurface sources are determined to be minor contributors to total risk. Additional indoor and ambient air sampling may be needed to confirm this relationship.

5) $AIA < AA < IA$

There is an **unacceptable** risk, primarily from indoor/subsurface sources but with ambient air contributions. When ambient air concentrations are greater than risk based concentrations, the ambient concentrations may be utilized as the cleanup criteria.

Also, ambient concentrations (if considered representative) may be subtracted from indoor air concentrations to estimate the remaining risk due to indoor/subsurface sources. If this remaining risk is still significant further evaluations can be conducted to distribute the respective contributions from indoor vs. subsurface sources.

Elevated ambient air concentrations may need to be confirmed with additional sampling. If subslab vapor data are available a comparison to ambient air concentrations may provide some indication as to the relative contribution of these two sources to indoor air risk.

6) $AA < AIA < IA$

There is an **unacceptable** risk and it is primarily from indoor/subsurface sources. If the indoor inventory does not indicate significant potential indoor sources or if identified sources were removed prior to sampling the dominant source of vapors is more likely to be subsurface in origin.

The conclusions in Scenarios 5 and 6 above are supported when data from subslab and deeper soil gas samples show that the source to indoor air is not due to subsurface releases. For example, if subslab soil vapor concentrations are greater than indoor air and if soil vapor is of chemical composition similar to indoor air samples, the conclusion that the source to indoor air is from the subsurface is supported. In addition, if the attenuation ratios* of individual COIs between subslab and deeper soil vapor concentrations and indoor air concentrations increase with depth, the conclusion that the primary source is the subsurface is supported.

In contrast, in some instances, the above data may show that the source to indoor air is not from the subsurface, as follows. Results showing that deeper soil vapor concentrations (if they are taken above a known source) are lower than subslab or indoor air concentrations indicate that the source to indoor air is not the subsurface and that subslab soil gas may be impacted by indoor air.

Further, a comparison of COI and concentrations in the indoor air, subslab and deeper vapor samples may show that the chemicals in the subslab samples are impacted by indoor air and the source is not the subsurface release.

* Tracer compounds in vapor and air, such as radon, can also be used to calculate attenuation ratios, particularly between subslab vapor (where biodegradation can be considered negligible) and indoor air.

A7.3 PROTOCOL FOR THE MEASUREMENT OF SOIL VAPOR LEVELS

The goals of soil vapor sample collection and analysis are: (1) to obtain spatially and temporally representative values that can be used to assist in a determination whether a VI issue exists at a site; and (2) to estimate risk to the receptors.

The reliability of soil vapor concentrations at a site may be impacted by a number of factors, including:

- (1) Atmospheric conditions (temperature, pressure, precipitation, etc.);
- (2) Soil conditions (porosity, moisture content, vapor permeability, stratigraphy);
- (3) Site and structure characteristics (location and amount and type of paved surfaces, type of building construction, HVAC design and operation, etc.);
- (3) Source characteristics;
- (4) Age of the release; and
- (5) Capacity of the soil to attenuate or biodegrade the chemicals of concern.

To the extent that these factors exhibit spatial and temporal variations, soil vapor concentrations can be variable and thereby less reliable. Thus, a single soil gas sampling event is often not adequate to characterize potential VI pathways. A single sampling event can be appropriate if the SCM is well understood and complete, the proposed sampling is considered representative of that SCM and it can be demonstrated to IDEQ that the factors described above have been accounted for and are not influencing measured concentrations.

When collecting vapor samples at a site, the number and timing of measurement events must be sufficient to account for the factors (out of those listed above) expected to contribute the greatest amount to vapor concentration variability. For example, at sites where ground water depths are shallow and there are significant seasonal water table fluctuations (> 5feet) measurements should be made when the water table is both high and low. If initial sampling takes place during periods of high soil moisture, such as after a significant precipitation event, it may be desirable to repeat the sampling when drier soil conditions exist. Atmospheric conditions of increasing high pressure, associated with the arrival of weather fronts, can result in net movement of air and vapor downward, potentially reducing vapor concentrations if sampling occurs during these times. This may necessitate additional sampling during periods of greater atmospheric stability. Subslab vapor sampling can be impacted by pressure gradients created by atmospheric and structural conditions, which should be accounted for.

IDEQ recommends the owner/operator develop a work plan describing how representative soil gas data will be collected at the site for use in site characterization and risk evaluation and submit it for review and approval by DEQ prior to collecting the data. The work plan should include:

- The soil gas measurement technique and method of analysis
- Sampling Locations
- Sampling Depths
- Sampling Numbers
- QA/QC Procedures

Each of these is discussed below.

A7.3.1 Soil Gas Measurement Techniques and Analysis

Soil vapor can be collected and analyzed in a number of ways. Presently, DEQ recommends the use of permanently installed active soil gas probes for most applications where the data will be used for risk assessment.

Depending on the site conceptual model and the goals of the investigation active soil gas probes can consist of single installations located inside (subslab vapor probe) or outside a structure or they can be nested multiple probe installations. A typical outdoor permanent single probe installation is presented in Figure A7-4 and a nested multiple probe installation in Figure A7-5. Subslab probe construction is illustrated in Figure A7-6 and described in EPA (2006) and Hartman (2010).

As discussed above, it may be necessary to collect soil vapor samples from soil probes at multiple times in order to address data variability. Hence, probe installations should be treated similarly to a ground water monitoring well in terms of their construction and expected longevity. Guidance on the installation and sampling of soil vapor monitoring probes is provided in the ASTM Standard Guide for Soil Gas Monitoring in the Vadose Zone, Designation: D 5314-92 (ASTM, 2006), the California Environmental Protection Agency Advisory for Active Soil Gas Investigations (Cal EPA, 2010) and Hartman (2010).

Soil vapor samples can be collected in a Tedlar bag, evacuated Summa canister or granulated carbon depending on the analytical method used. The typical analytical methods used for the collection of soil vapor samples are EPA Methods TO-15 and TO-17. Method TO-17 is most appropriate where lower detection limits for compounds such as naphthalene are needed, such as for indoor air or subslab vapors. Prior to collecting the sample, the probes and tubing should be thoroughly purged to ensure that the sample sent for analysis is truly representative of the formation being sampled. Leak testing of soil probe installations is also recommended.

IDEQ recommends analysis of the vapor samples for fixed gases such as oxygen, methane and carbon dioxide at time that chemical concentrations are measured. These measurements may be used to demonstrate the occurrence of biodegradation.

A7.3.2 Sampling Locations

The following criteria, which constitute the major elements of a site conceptual model, should be considered when selecting the number, type and potential locations for soil vapor measurements:

- The size, magnitude and location of the release area, soil and ground water contamination, and free phase product.
- The location of existing buildings on site and off site in relation to vapor source areas.
- The location of potential future on-site and off-site buildings.
- The location of paved and unpaved surfaces.
- The location of potential preferential pathways for vapor migration such as utility trenches, sumps, low permeability layers, or fractured subsurface geology.

Probes should be located to adequately characterize the vapor pathway between the source and the structure. IDEQ recommends collection of samples as close as possible around the footprint of an existing structure and within the footprint of potential future structures. When contamination extends under an existing structure, sampling points within the structure may be necessary. These samples may consist of soil vapor probes below the concrete slab of an existing floor or within the earthen material of a crawl space or unfinished basement or ambient air sampling.

In all cases, at least one soil vapor probe shall be located in the source areas (the most impacted soil area and above the most impacted ground water area). Sampling at off-site locations may be necessary if soil or ground water contamination associated with the release is known or suspected to have migrated off site.

With the exception of vapor source area sampling or areas potentially slated for future development, sample probes should not be located in unpaved areas or areas subject to impacts from water infiltration or surface volatilization. If samples are to be collected from unpaved areas they should be taken at depths greater than five feet, where site conditions permit.

Proposed locations of soil vapor borings on a site map and the rationale for the location may be included in a work plan submitted to DEQ for review and approval.

A7.3.3 Sampling Depths

The depth at which soil vapor samples are collected is a site-specific determination primarily dependant on the goals of the investigation, whether a structure is present and, if present, the type of structure. For risk assessment purposes, sample depth should correspond to the characteristics of impacted or potentially impacted structures. Subslab vapor probes should be installed as close to the base of the foundation slabs possible. When feasible, deeper probes are appropriate when attempting a detailed investigation of a subsurface source to indoor air; deeper probes can be installed below the slab.

Ideally, structures with basements with earthen floors or crawl spaces (vented or unvented) should be investigated with ambient air samples collected from within the space itself. If this is not possible, vapor samples can be collected from soil probes installed in the earthen floor. These probes should be constructed and installed such that the effects of surficial drying are minimized, the samples are representative of subsurface conditions and the potential for short-circuiting of vapor flow is minimized. The use of deeper soil probe installations (greater than 3 to 5 feet) in these instances can help avoid these issues.

Individual probes outside a slab-on-grade building footprint should be installed as close as possible to the base of foundation footings, typically 3 to 5 feet below ground surface. Structures with basements will require greater depth of installation. In no case should probes be located shallower than the foundation depth. Where it is feasible to do so and where it fits with the SCM, when installing probes in areas that are unpaved deeper probe installations (greater than five feet below ground surface) are preferred.

Nested soil gas probes located at multiple depths (Figure A7-3) can aid in the characterization of soil, ground water, or NAPL source areas, structures with basements, soil layering effects on vapor concentrations and in documenting the presence of biodegradation. For structures with basements, soil gas multiple depth probes should be located below and adjacent to the basement wall. In ground water source areas, IDEQ does not recommend locating probes or collecting samples within the capillary fringe.

A7.3.4 Sample Numbers

The number of sample locations needed is a site-specific determination that is a function of the size and location of vapor source areas in relation to existing structures, the number, size, and construction of existing potentially impacted structures and the goals of the investigation. For existing buildings with soil or ground water contamination below them, if only outside probes are used IDEQ recommends a minimum of four probes, one on each side of the building. For subslab probe installations for typical building sizes (up to 2000 square feet) a minimum of three probes is recommended, ideally spaced throughout the footprint of the structure and taking into account the spatial location of the vapor source. The rationale of this sampling scheme is to attempt to account for the spatial variability in soil gas chemical and oxygen concentrations observed across similarly sized structures (Luo, et al, 2009).

Larger commercial spaces will likely require greater numbers of probes. If indoor air sampling is also being conducted and it is feasible to collect deeper soil vapor samples under the building this data may assist in interpretation of potential sources of any detected chemicals in indoor air.

One or more probes should be located in each vapor source area. The number of depth intervals at a given sampling location for nested probe installations will be dependant on factors such as the total soil thickness being investigated, the depth to soil, ground water or NAPL sources, and the degree of soil layering or heterogeneity present. If the goal is to demonstrate the occurrence of biogradation with multidepth probes, then enough points should be installed at a given location to be able to clearly show the location of the transition to clean soil/well oxygenated conditions.

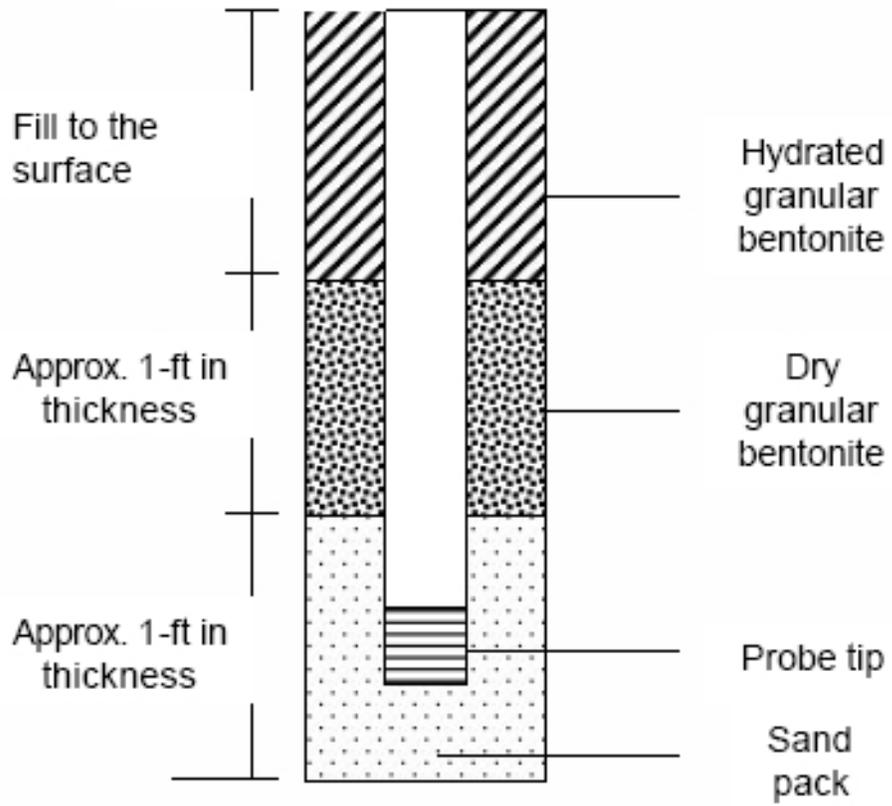


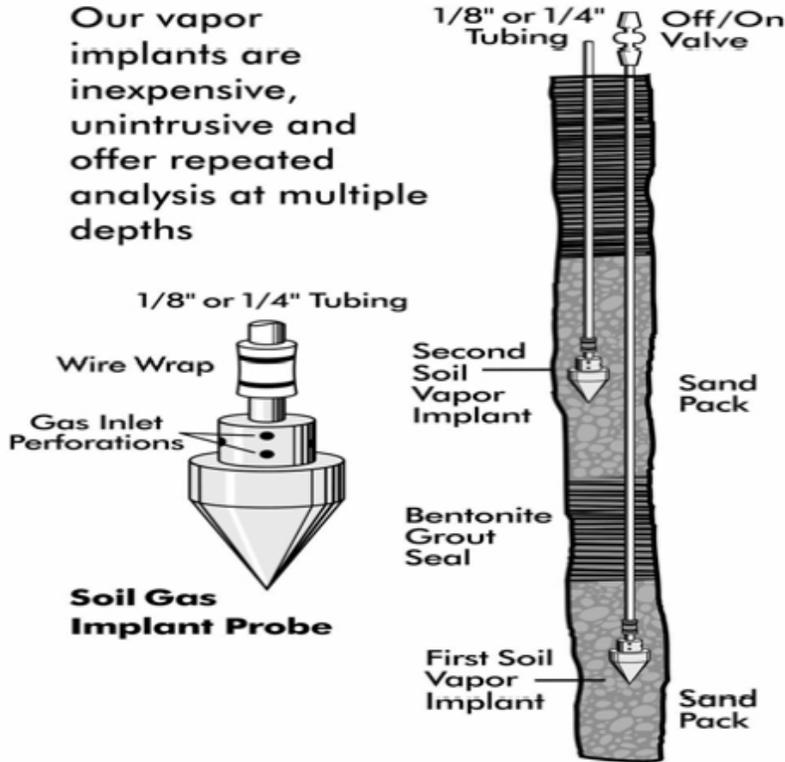
Figure A7-3. Schematic of Single Permanent Soil Vapor Probe Installation (adapted from CEPA, 2010)

Figure A-4. Schematic of Multi-depth Soil Vapor Probe Installation (from Hartman, 2010)

Multi-Depth Nested Well

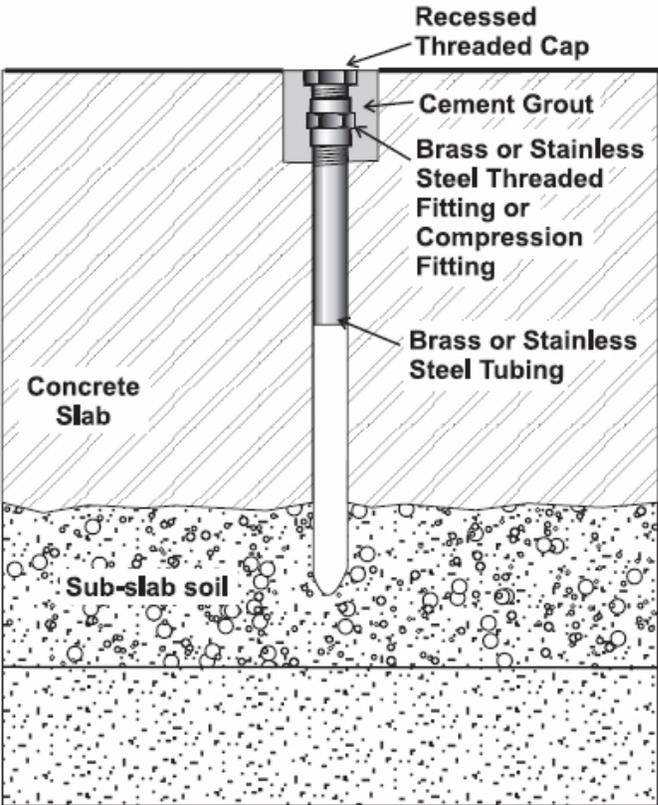
Soil Vapor Nested Well

Our vapor implants are inexpensive, unintrusive and offer repeated analysis at multiple depths



7

Figure A7-5. Schematic of Subslab Soil Vapor Probe Installation (from EPA, 2006)



A7.3.5 QA/QC Procedures

In addition to the common QA/QC procedures that are employed during any environmental sampling event (collection of appropriate QA samples, decontamination) particular attention should be paid to the following items during the collection of soil vapor samples:

- Leak testing of soil probe installations during sampling.
- Selection of appropriate sampling equipment.
- Purging and monitoring prior to sampling.
- Selection of appropriate analytical methods.

A7.4 INDOOR AIR SAMPLING

The intent of this section is not to provide exhaustive details on indoor air sampling protocols, but rather to outline a desired approach and identify issues that must be considered and addressed when developing a work plan for these types of data collection efforts. IDEQ recommends that a workplan be submitted for review prior to implementation of any indoor air sampling investigation.

Comment [krd1]: Should we add language that a work plan is recommended and outline what should be in it, as you did for soil vapor above?

Sampling details are well presented in other guidance documents. Notable examples are those developed by the U.S. Environmental Protection Agency (EPA, 1990 and 1992), New Jersey Department of Environmental Protection (NJDEP, 2005) and the Massachusetts Department of Environmental Protection (MDEP, 2002). Indoor air sampling typically utilizes active sampling methods such as air pumps or evacuated canisters with flow controllers. Passive diffusive samplers are currently being developed which may provide data quality comparable to active methods (Sigma-Aldrich, 2010; EPA, 2010c) for both ambient and indoor air sampling.

The ultimate goal of the data collection is to document unacceptable exposure to chemicals of interest resulting from a specific release. In order to achieve this goal, the contribution of other sources of the chemicals of concern, either from ambient, outdoor sources or from sources within the building itself must be eliminated. Therefore, an integral part of any indoor air sampling campaign will be the collection of representative, contemporaneous outdoor air and soil gas data (typically in the form of subslab soil vapor).

The influence of seasonal and diurnal meteorological changes on indoor air concentrations may necessitate conducting multiple sampling events. In general, a minimum of two events timed so as to account for the effect of these variables is necessary. If the goal is to identify “worst case” indoor air concentrations, then sampling should take place under those circumstances that will maximize indoor air concentrations. In many cases this will entail sampling during winter or early spring because of the influences of building depressurization, reduced building ventilation, and frozen ground.

Impacts from ground water sources may require sampling during periods of high water levels (for dissolved phase chemicals of concern) or low water levels (if separate phase product is suspected). If the goal is to characterize “average” conditions, multiple events conducted at a variety critical time periods may be needed.

A single sampling event may be appropriate if the SCM is well understood and complete, the proposed sampling is considered representative of that SCM and it can be demonstrated that the important influences on indoor air concentrations (such as those described above) have been accounted for and are not likely to influence measured concentrations.

Other important considerations when developing an indoor air sampling work plan include:

- Sampling duration: The typical sampling duration for both ambient and indoor air is 24 hours. Sampling for shorter time periods (8 hours) may be justified if the goal of the sampling is to document “worst case” conditions or where 24 hour sampling is not practical.
- Target detection limits: The target detection limits for indoor and ambient air samples should be the USEPA ambient air screening levels for residential and industrial receptors (EPA, 2010b). The appropriate analytical methods (TO-15, TO-17) and sample volumes needed to achieve these detection limits should be selected and described in the work plan.
- Building construction and HVAC operation: How the structure of interest is constructed (slab-on-grade, basement, crawlspace), the activity patterns of building occupants, and the design and operation of any HVAC system used in the structure should be understood when determining the number and location of indoor air samples.
- Indoor sources: Prior to sampling an inventory of potential indoor sources of the target chemicals of interest should be compiled. If possible, identified indoor sources should be removed prior to sampling. Building survey forms and checklists are available from a number of sources (NJDEP, 2005; ODEQ, 2010).
- Other on-site source: Sampling locations for ambient air should generally be upwind (taking into account seasonal changes in dominant wind direction) of the structure of interest. If potential onsite outdoor point sources of the chemicals of interest are identified that are not in a dominant upwind direction and cannot be removed, additional ambient air samples should be considered to account for their potential influence on indoor air quality.
- Data analysis: Data interpretation is discussed in Section A.7.2.3 of this document.

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APPENDIX A-8: APPLICATION OF NATURAL ATTENUATION

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INTRODUCTION

This appendix presents general guidance on the applicability and implementation of remediation by natural attenuation (RNA) at petroleum release sites in Idaho. Its primary focus is on attenuation of ground water contamination. Attenuation of petroleum hydrocarbons has also been documented in other media such as soil and soil vapor. Attenuation in soil vapor is addressed in appendix A-7 which discusses evaluation of the vapor intrusion pathway. This appendix is divided into three parts:

Part I presents a brief overview of the science of natural attenuation (NA);

Part II presents the regulatory requirements for implementing NA as a remedial option;

Part III discusses the techniques available to support, quantify, and implement NA as a remedial option.

This document should be used in conjunction with the Idaho Risk Evaluation Manual for Petroleum Releases (REM) and publicly available literature when implementing RNA. Additional information is available in the references provided at the end of this document.

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PART I: THE SCIENCE OF NATURAL ATTENUATION

Part I presents an overview of the science of natural attenuation. This includes:

- A brief overview of the processes that constitute NA (A8.2),
- A description of how biodegradation operates in attenuating petroleum hydrocarbons. (A8.3), and
- A description of the indicators of natural attenuation of hydrocarbon plumes (A8.3.5).

A8.1 THE CONCEPT OF NATURAL ATTENUATION

The term natural attenuation refers to the reduction in concentration or mass of chemicals in a media due to the effects of various environmental fate and transport processes. Natural attenuation occurs without human intervention. Although the term NA is applicable to a reduction in concentration in any medium (air, surface water, ground water), in this document it refers to the reduction in concentration of a dissolved ground water contaminant plume. For a ground water plume, environmental fate and transport processes include physical processes (advection, dispersion, dilution, sorption, and volatilization), chemical processes (hydrolysis, oxidation, and reduction), and biodegradation processes (aerobic and anaerobic). Physical processes are non-destructive in that they redistribute the chemicals in the environment without affecting the total mass of the individual chemical. Biodegradation and chemical transformation processes result in the destruction of the chemical, or, more accurately, the transformation of the parent chemical into other chemicals referred to as daughter products.

The only human action involved in RNA is monitoring to demonstrate that concentration reduction is occurring at a reasonable rate. Depending on site-specific conditions, RNA may be used as a stand-alone corrective action strategy or in combination with other engineered remediation alternatives.

This guidance focuses on using NA on sites contaminated with petroleum products. Natural attenuation has also been used at sites with other classes of contaminants, such as metals, explosives, and pesticides (USACE, 1999; SNL, 1997). The same concepts for evaluation, requirements for site characterization, and demonstrations as to effectiveness are required regardless of the class of contaminant. A general approach to the evaluation of the bioremediation aspects of natural attenuation for a range of biotreatable compounds is described in ITRC, 2002.

A8.2 OVERVIEW OF NATURAL ATTENUATION PROCESSES

Although each contaminated site is unique, for this discussion it is useful to consider a generic site where a spill has occurred. The soil immediately below and around the point of release becomes contaminated and the contaminant front moves downward. The downward movement of the contaminant front continues until one of the following three conditions occurs:

- The soil pores are saturated and no more contaminant is available,
- An impermeable barrier is encountered and the contaminant spreads horizontally, or
- The contaminant reaches the water table and, if it is a light non-aqueous phase liquid (LNAPL), spreads horizontally.

Note the term LNAPL relates to the density of the contaminant that was/is released. LNAPLs are chemicals that are liquid at ambient temperature but lighter than water. For example, the density of toluene is 0.866 g/cc compared to a density of 1 g/cc for water.

After the contaminant movement has stopped, the soil through which it traveled would be contaminated with residual chemicals that act as a contaminant source for the ground water plume. Figure A8.1 shows a schematic of a LNAPL moving through the soil to the ground water.

When rainwater infiltrates through the residual contaminated soils, it dissolves and leaches out the soluble components. For petroleum hydrocarbons, the toxic soluble chemicals include, but are not limited to, benzene, toluene, ethylbenzene, and xylene (BTEX); the soluble additives methyl tertiary butyl ether (MTBE) and ethylene dibromide; and smaller fractions of other less soluble constituents. These dissolved chemicals reach the water table, after undergoing NA processes in the unsaturated zone, mix with ground water, and move with the ground water to form a dissolved plume. At sites where the spill is of a sufficient quantity to reach the water table and form a LNAPL layer on the water table, soluble constituents from the LNAPL gradually dissolve in ground water and form a dissolved ground water plume.

Additionally, vapors of volatile hydrocarbons (chemicals with a Henry's constant of greater than 1×10^{-5}) will spread outwards from the contaminated soil and dissolve in soil moisture and ground water.

As the dissolved plume moves through the unsaturated and the saturated zones, its concentration decreases due to the combined influence of several NA processes. Each of these processes is briefly discussed below.

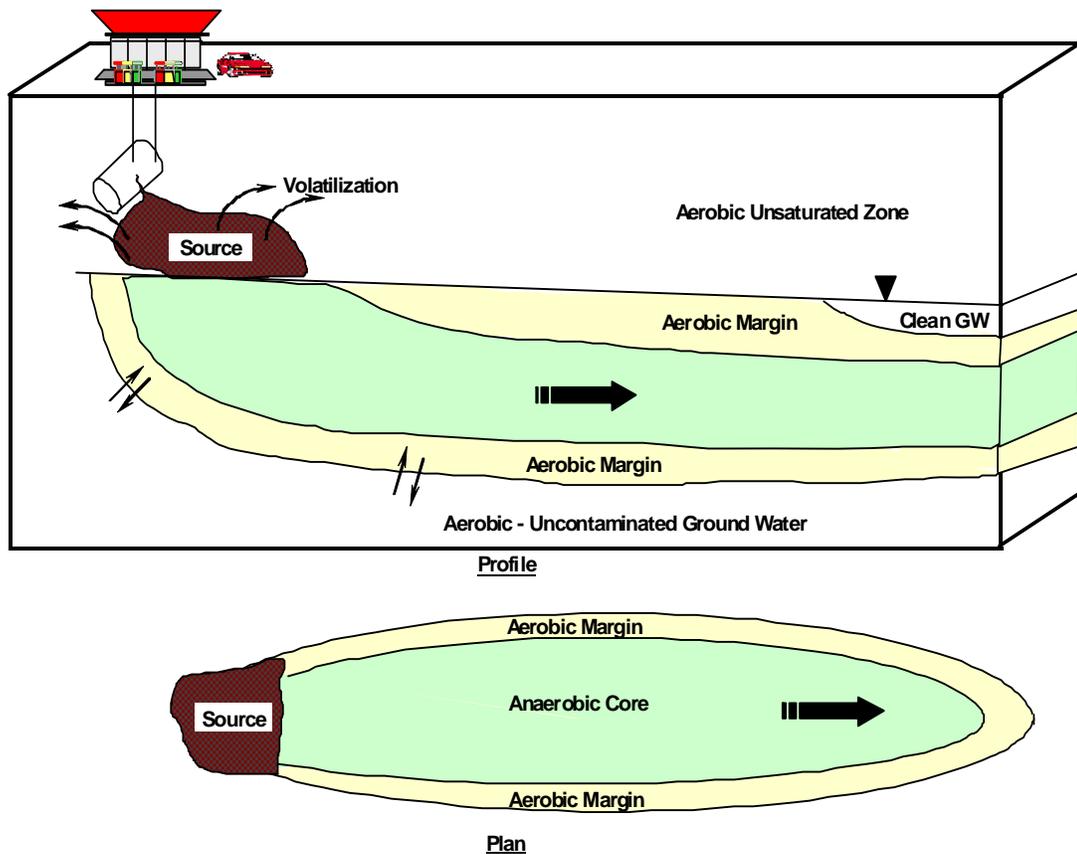


Figure A8-1. Schematic of a Hydrocarbon Release

A8.2.1 Advection

Advection refers to the bulk movement or flow of water caused by differences in density, temperature, or pressure. In most aquifers, flow occurs predominantly due to hydraulic gradients, which may be natural, resulting in regional ground water movement, or man-made caused by pumping or artificial recharge. In saturated zones, hydraulic gradients may exist in horizontal and vertical directions resulting in complex three-dimensional flow patterns. However, at most sites there exists a predominant flow direction that results in the migration of most mass.

As water moves in the saturated zone it carries with it the dissolved constituents. The process results in the migration of dissolved constituents in the saturated zone without change in concentration and is termed advection.

Parameters required to estimate the volume of water moving through a saturated zone include the Darcy velocity and the cross-sectional flow area. Darcy velocity is estimated using hydraulic conductivity and hydraulic gradient.

Hydraulic conductivity may be estimated using a variety of methods including slug tests, pump tests, grain size distribution, and literature values corresponding to the site stratigraphy. For most saturated zones, hydraulic conductivity varies in the horizontal and the vertical direction.

Site-specific values of hydraulic gradients are estimated based on water level measurements in monitoring wells, or piezometers. When estimating horizontal hydraulic gradients, it is important to compare data from wells screened in the same saturated zone. Wells screened in different zones or at different depths (e.g., cluster wells) can be used to estimate the vertical hydraulic gradient between the zones. Site-specific hydraulic gradients may exhibit seasonal and spatial variations (magnitude and direction) due to a variety of factors such as pumping, seasonal flow in surface water bodies, and seasonal variations in rainfall.

Another related parameter, used to estimate the travel time of a chemical due to advection, is the seepage velocity that requires an estimate of the porosity of the media. Typically literature values corresponding to the aquifer type (sand, silt, etc.) are used to estimate porosity.

A8.2.2 Molecular Diffusion

Molecular diffusion refers to the transport of chemical mass from a zone of higher concentration to a zone of lower concentration due to the movement of molecules. The effect of diffusion is to spread the chemical mass over a large area and hence reduce the overall concentration. Thus, diffusion results in a reduction in concentration by dilution. In most ground water systems where there is advection, the attenuation in concentration or the chemical mass transport due to diffusion is small and often negligible. However, in no flow or low flow situations, diffusion can be an important attenuation mechanism.

Molecular diffusion is quantified using the Fick's Law and the parameter required to quantify diffusion is the effective diffusion coefficient of the chemical (Freeze and Cherry, 1979).

A8.2.3 Mechanical Dispersion

Mechanical dispersion refers to the spreading of the contaminant plume that occurs due to variations in the flow velocity. In the saturated zone, velocity variations occur due to a variety of factors including inter-pore and intra-pore velocity variations and the tortuosity of the porous media. The net effect of mechanical dispersion is that the chemical spreads both horizontally and vertically, thus reducing the overall concentration in the plume. Thus, like diffusion, dispersion is a dilution process.

The transport of mass due to mechanical dispersion is quantified using Fick's Law. The key parameters are the dispersivity coefficients in the three cardinal (x, y, and z) directions. Dispersivity values have been measured using tracers at several research sites, based on which empirical dispersivity relationships (EPRI, 1985; Xu and Eckstein, 1995) have been developed. For most site-specific applications of fate and transport models, these empirical

relationships are used. Higher dispersivity values result in larger plumes, which result in increased dilution and lower concentrations.

A8.2.4 Hydrodynamic Dispersion

The term hydrodynamic dispersion refers to the sum of molecular diffusion and mechanical dispersion. In most ground water systems where there is advection, hydrodynamic dispersion is approximately equal to mechanical dispersion, since the effect of molecular diffusion is negligible.

A8.2.5 Sorption

Sorption refers to the transfer or distribution of mass between the liquid and the solid phases. Sorption has the overall effect of reducing the mobility of the chemical, which increases its residence time in the subsurface and hence the amount of microbial degradation. This distribution is quantified by the soil water distribution or partition coefficient. For organic chemicals, the distribution coefficient depends on the chemical-specific normalized organic carbon partition coefficient and the organic carbon content in the soil. The distribution coefficient is used to estimate the retardation factor for the chemical, which is a measure of the “stickiness” of the chemical to the formation. Parameters required to estimate the retardation factor include porosity, organic carbon content of soil, bulk density of soil, and chemical-specific normalized organic partition coefficient.

A8.2.6 Volatilization

Volatilization refers to the transfer of chemical from the LNAPL or the dissolved phase to the vapor phase. Vapors can migrate by diffusion alone (in the absence of a pressure gradient) and by diffusion and advection if a pressure gradient exists in the formation. Chemicals volatilizing from the dissolved plume occupy the pores in the unsaturated zone and migrate outwards due to the combined influences of molecular diffusion and vapor-phase advection if pressure gradients exist. Thus, volatilization can result in a net loss of chemical from the dissolved phase or from the LNAPL.

The chemical-specific factors controlling volatilization from a dilute solution and LNAPL are the Henry’s Law constant and saturated vapor pressure, respectively. These factors are sensitive to the temperature of the media where volatilization occurs.

A8.2.7 Biodegradation

Biodegradation refers to the destruction of chemicals by indigenous microorganisms present in the aquifer. For petroleum hydrocarbons, biodegradation is the primary destruction mechanism. Due to the significance of biodegradation within the overall process of NA, biodegradation is discussed at length in Sections A8.3. In certain situations, additional compounds (ozone, oxygen, peroxide), nutrients or microorganisms may be added to the contaminant plume to enhance the rate of biodegradation.

A8.2.8 Overall Effect of Natural Attenuation Processes

As explained above, the process of NA refers to a combination of advection, molecular diffusion, dispersion, sorption, volatilization, chemical reactions, and biodegradation.

The combined effect of these processes is to spread or reduce the chemical mass in the dissolved plume. Thus, the concentration of the chemical decreases as distance from the source increases. Figure A.8.2 shows the concentration profiles in monitoring wells down-gradient of a source under ideal conditions. Although such patterns have been observed at several sites, fluctuations in water levels, flow direction, and climatic conditions often result in non-ideal behavior. Additional complications occur due to errors in data collection, analytical measurements, and the existence of multiple sources (in space and time) at a site.

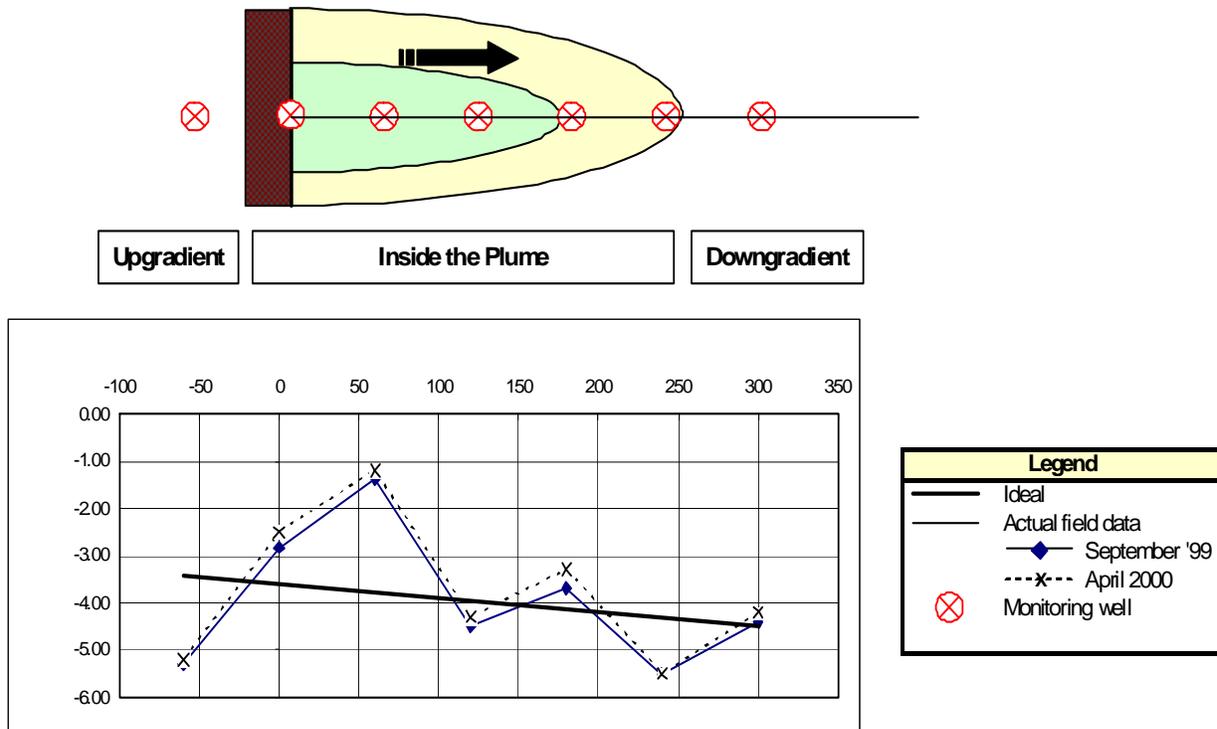


Figure A8.2. Concentration Profile as a Function of Distance (Ideal Behavior and Data from an Actual Site)

Depending on the overall rate of NA and the on-going contribution of chemicals to the ground water plume from the residual soil source, ground water plumes may be classified as expanding, stable, or shrinking. These concepts are discussed below.

A8.2.8.1 Expanding Plume

An expanding plume is characterized by increasing concentrations within the plume and/or an outward movement of the plume that increases the size of the plume. An expanding plume occurs when the chemical mass loading to the plume from leaching, or dissolution of residual LNAPL exceeds the mass loss due to NA processes.

In an expanding plume, NA processes continue to occur but at a rate too slow to prevent the increase in concentrations or the size of the plume.

A8.2.8.2 Stable Plume

A stable plume is characterized by stable concentrations within the plume and at the periphery of the plume (i.e., the concentrations do not show a decreasing or an increasing trend). For a plume to be stable, the rate of chemical mass addition to the plume from the source is equal to the rate of chemical mass loss by NA processes. The source may be the chemicals leaching from adsorbed and residual concentrations in the capillary/water table fluctuation zone or in the vadose zone, or the dissolution of chemicals from the LNAPL source.

A8.2.8.3 Shrinking Plume

A shrinking plume is characterized by decreasing ground water concentrations within the plume, decreasing concentrations at the periphery of the plume, or a decrease in the area of the plume. For a shrinking plume, the addition of chemical mass from the source is less than the mass lost due to NA processes. Thus, unless site-specific conditions change that result in an increase in chemical mass addition to the plume or a decrease in the rate of NA, the plume will eventually disappear.

A8.2.8.4 Lifecycle of a Plume

Initially, when a chemical reaches the ground water and a plume forms, it is an expanding plume. The plume continues to expand until the addition of chemical mass from the source exceeds mass loss by NA processes. As the plume expands and occupies an ever-increasing portion of the aquifer, the loss of mass by NA processes increases. Thus a point is reached when the mass addition equals mass lost, and the plume becomes stable. Because of the phenomenon of NA, most, but not all, BTEX plumes resulting from service station spills become stable at lengths less than 500 feet, as demonstrated by numerous plume studies (Buscheck et al., 1996; Rice et al., 1995). At most sites the chemical source is finite; hence, in time the mass loading from the source to the dissolved plume decreases. Meanwhile, the rate of mass loss due to NA processes increases or stays the same, so eventually the plume begins to shrink.

Under ideal conditions, all dissolved chemical plumes would follow the above lifecycle; however, real plumes may not follow this pattern due to a number of confounding factors. These factors include, but are not limited to:

- Variations in ground water velocities that affect the rate of NA,
- Fluctuations in the water table that affect the source mass loading due to the release of chemicals trapped in the capillary fringe,
- Variations in climatic conditions that affect the rate of NA,
- Variations in rainfall and infiltration that affect mass loading to ground water, and
- Additions to the plume from new releases and spills from operating facilities.

Because of the above complications, it is important to collect and evaluate all the site data and look at multiple lines of evidence to understand the plume behavior and predict its future behavior. This aspect is discussed in Section A8.3.5.

A8.3 BIODEGRADATION OF PETROLEUM HYDROCARBONS

This section discusses the biodegradation of dissolved petroleum hydrocarbons and identifies the various indicators that should be measured to confirm the occurrence of biodegradation.

The biodegradation of hydrocarbons is the process by which naturally occurring subsurface microorganisms biodegrade contaminants. The process of biodegradation, as facilitated by microorganisms can be represented by the general reaction:



The above biologically mediated reaction produces energy for cell growth and reproduction of the microbial population. The process of electron transfer results in the oxidation of the donor (hydrocarbon), reduction of the electron acceptor, and the production of usable energy for the organisms. Based on the principles of thermodynamics, biologically mediated reactions that yield the most energy take are favored over reactions that yield less usable energy for the organisms. For hydrocarbons, biologically mediated reactions ideally occur in the following order:

1. Dissolved oxygen in the ground water is used as the electron acceptor.
2. After all oxygen has been depleted, and anaerobic conditions exist within the dissolved plume, dissolved nitrate is used as the electron acceptor.
3. After the depletion of dissolved oxygen and nitrate, ferric iron is used as an electron acceptor and is reduced to ferrous iron.
4. After the depletion of oxygen, nitrate, and iron, sulfate is used by sulfate-reducing bacteria to degrade the hydrocarbons.
5. Finally, methanogenesis degrades the hydrocarbons.

While all petroleum hydrocarbons are biodegradable, the rate of biodegradation can differ significantly from site to site depending on the composition and amount of hydrocarbons; type and amount of available electron acceptors; type, number, and characteristics of the microorganisms; and quantity and quality of nutrients.

Thus, site-specific measurements of these factors, comparison of these factors within and outside the plume, and temporal variations in these factors can be used to demonstrate the occurrence of biodegradation. Each of these factors is discussed below.

A8.3.1 Composition and Amount of Hydrocarbons

Almost all petroleum hydrocarbons are degradable under aerobic conditions. The ease of biodegradation depends on the type of hydrocarbon. Low molecular weight hydrocarbons (e.g., C10 to C24 alkenes) and single ring aromatics are most easily biodegradable.

As the molecular weight increases, the resistance to biodegradation increases. Individual compounds degrade at different rates under aerobic and anaerobic conditions.

For most hydrocarbon-impacted sites, the primary chemicals of concern (from a risk perspective) are BTEX, MTBE, and naphthalene. Naphthalene and BTEX are readily degradable under aerobic conditions. Benzene typically degrades slower than other BTEX hydrocarbons under anaerobic conditions. The biodegradation and natural attenuation of MTBE has been a topic of current research (Moyer and Kostecki, 2003, EPA, 2005, API, 2007). It has been established that MTBE is degraded under both aerobic and anaerobic conditions. The rates of MTBE degradation and controlling factors have not yet been firmly established.

A8.3.2 Available Electron Acceptors

As indicated above, the biodegradation of hydrocarbons is essentially an oxidation- reduction reaction. In this reaction the hydrocarbon donates the electron (i.e., the hydrocarbon is oxidized) and a second compound (the electron acceptor) is reduced. Of the several electron acceptors available in the subsurface environment, oxygen, because of its high energy yield, is typically utilized first by microorganisms. Anaerobic bacteria can use other electron acceptors including:

- Nitrate (NO_3^-) that is reduced to nitrogen (N_2)
- Manganese (Mn^{4+}) that is reduced to a water soluble (Mn^{2+})
- Ferric iron (Fe^{3+}) that is reduced to water soluble (Fe^{2+})
- Sulfate (SO_4^{--}) that is reduced to sulfide (S^-)
- Carbon dioxide (CO_2) that may be used by methanogens to yield methane (CH_4)

As the biodegradation of hydrocarbons occurs, the concentration of the electron acceptors decreases and the concentration of the products formed increases. This concept can be used to demonstrate the occurrence of biodegradation (secondary line of evidence, see Section A8.3.5.2). Figure A8.3 shows the expected relationship between the BTEX concentration and the electron acceptors and the products of the oxidation reduction reaction.

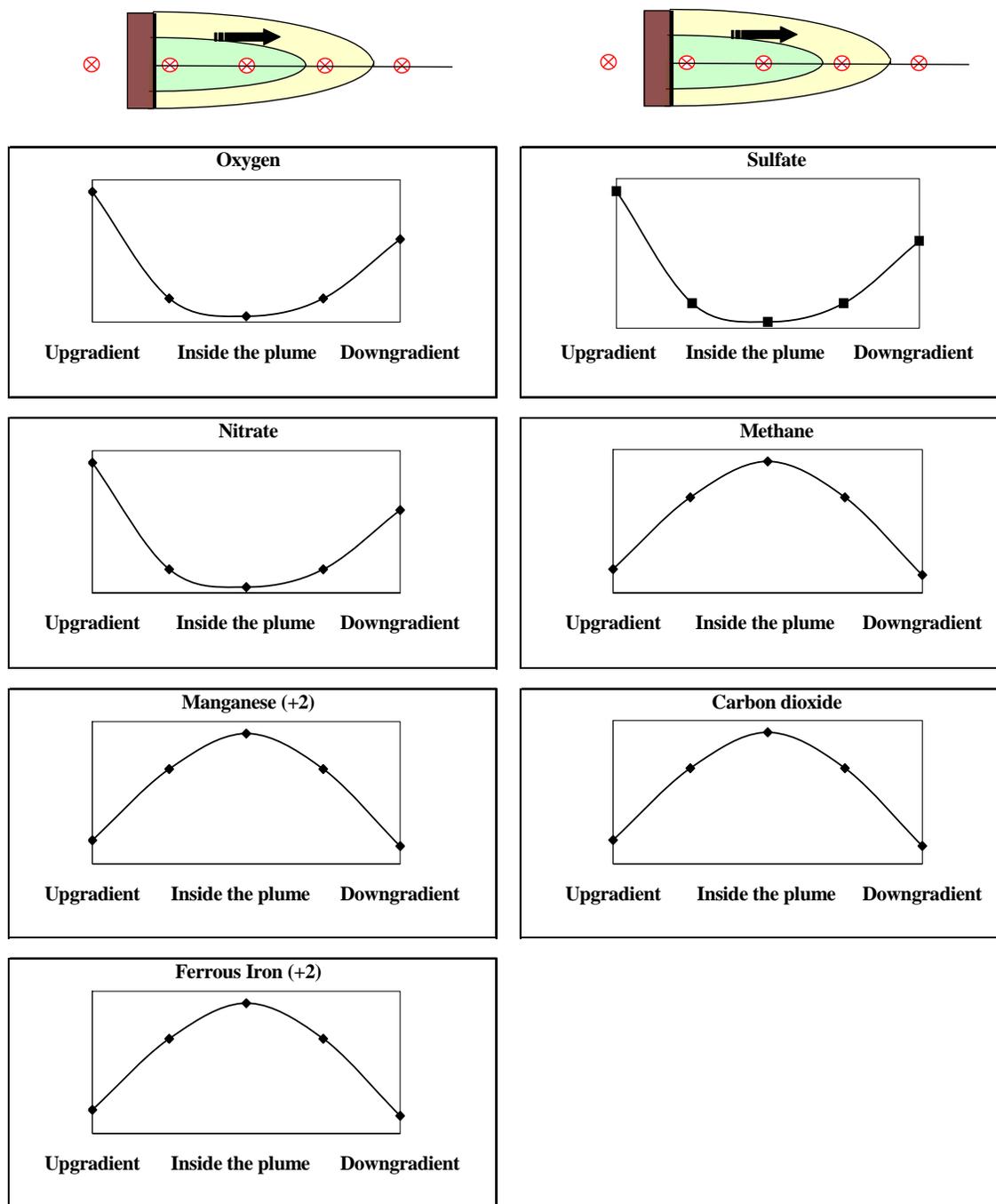


Figure A8.3. Expected Pattern of Natural Attenuation Indicators (Secondary Line of Evidence)

A8.3.3 Quantity and Quality of Nutrients

In addition to the electron acceptors, microorganisms also require nutrients. These nutrients get incorporated into the biomass and are necessary to form cells. The nutrients nitrogen and phosphorous are required in relatively large amounts. Small amounts of micro-nutrients, such as sulfur, manganese, and magnesium, are also required.

Certain compounds, such as nitrates and sulfates, can serve either as nutrients or electron acceptors. Nutrients are rarely a limiting factor in the subsurface biodegradation of petroleum hydrocarbons. A decrease in nutrient levels within the zone of degradation can be used as an indicator of biodegradation.

A8.3.4 Characteristics of Microorganisms

The ability of microorganisms to degrade a wide variety of petroleum hydrocarbons is well documented. Hydrocarbon-degrading microorganisms are widespread in the environment, as they occur in fresh water, salt water, soil, and ground water. The number of cells per milliliter of water can also be used as an indicator of biodegradation. As hydrocarbons degrade, the cell count for the hydrocarbon degrading bacteria increases. McKee et al. (1972) found 50,000 or more hydrocarbon-degrading bacteria per milliliter in samples from wells containing traces of gasoline, while a non-contaminated well had only 200 microorganisms per milliliter.

A8.3.5 Indicators of Natural Attenuation of Hydrocarbon Plumes

Based on the information presented above, concentrations of several parameters (hydrocarbons, electron acceptors, microorganisms, nutrients, and carbon dioxide) can be measured to demonstrate the occurrence of NA.

These measurements are typically divided into three tiers, or “lines of evidence” (primary, secondary, and tertiary lines of evidence) to demonstrate NA. Data collected under each line of evidence can be evaluated qualitatively or quantitatively.

A8.3.5.1 Primary Line of Evidence

The purpose of the primary line of evidence of NA is to demonstrate the loss of chemical mass by evaluating measured petroleum hydrocarbon concentrations. Of all the methods available to demonstrate the occurrence of NA, this is perhaps the simplest and most useful to demonstrate site-specific reductions in risk. Site-specific application of the primary line of evidence requires an adequate number of correctly installed sampling points (monitoring wells), an adequate amount of chemical data from these points, and a thorough evaluation of this data. These issues are discussed in Parts II and III of this document.

Although the primary line of evidence can show whether the concentration of a plume is attenuating, it does not show whether the decrease is due to destructive mechanisms or merely dilution. Secondary lines of evidence are necessary to determine whether the decrease is due to biodegradation.

A8.3.5.2 Secondary Line of Evidence

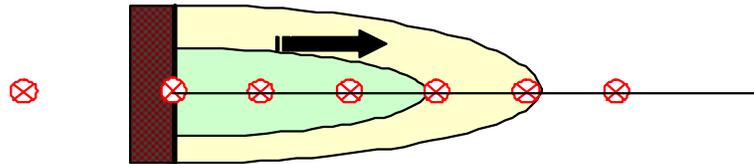
Secondary evidence of NA refers to the measurement of electron acceptors and products of metabolism within the plume and their comparison with concentrations in the unimpacted area of the aquifer, where no biodegradation activity would be expected to

occur. Parameters that are typically measured in the field include dissolved oxygen, dissolved nitrates, manganese, ferrous iron, sulfate, and methane. These parameters should be measured at up-gradient locations, inside the plume near the source, and at down gradient locations. Expected patterns of these parameters that are indicative of biodegradation, are shown in Table A8.1. and Figure A8.3.

As microorganisms consume chemicals, there is a corresponding consumption of the compounds that serve as electron acceptors. Thus the concentration of these compounds would decrease in the portion of the plume where biodegradation is occurring. For example, under aerobic biodegradation, the concentration of oxygen would decrease assuming oxygen is not being added to the plume. Similarly under anaerobic conditions, a depletion of nitrate, ferric (III) iron, sulfate, and carbon dioxide can be expected.

Biodegradation also results in an increase in the concentration of metabolic by-products. For example, increased concentrations of nitrite and ferrous (II) iron within the plume would be indicative of biodegradation.

**Table A8.1: Expected Pattern Of Natural Attenuation Indicators
(Secondary Line of Evidence)**



Upgradient	Inside the plume	Downgradient
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BTEX	ND	High	Low	ND
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Type of Reaction	Geochemical Indicator	Geochemical Indicator Concentration		
		Upgradient	Inside the plume	Downgradient
Aerobic	Oxygen	High	Low	High
Anaerobic	Nitrate	High	Low	High
	Manganese	Low	High	Low
	Ferrous Iron	Low	High	Low
	Sulfate	High	Low	High
	Methane	Low	High	Low
	Carbon dioxide	Low	High	Low

The secondary line of evidence demonstrates the occurrence of biodegradation only. It does not provide any data on the occurrence of other NA processes.

A8.3.5.3 Tertiary (Optional) Line of Evidence

The tertiary (optional) line of evidence involves performing microbiological studies, such as identifying the microorganisms present in the formation and counting their cells, in an effort to demonstrate the occurrence of NA. Thus, the objectives of secondary and tertiary lines of evidence are similar. In the portion of the plume where NA is occurring, the ratio of petroleum degraders to the total number of bacteria should be higher than in the uncontaminated portion of the plume due to the readily available petroleum energy source. Tertiary lines of evidence are seldom required at petroleum hydrocarbon impacted sites; hence, they are not discussed further. .

PART II: REGULATORY REQUIREMENTS FOR THE IMPLEMENTATION OF REMEDIATION BY NATURAL ATTENUATION

Remediation by natural attenuation refers to the achievement of site-specific cleanup goals using NA. As discussed in Part I, NA consists of several processes that occur at all contaminated sites at varying rates. As with any other remedial option, the site-specific applicability of RNA must be carefully evaluated before it is selected as the remedial alternative of choice. Remediation by natural attenuation should not be considered a presumptive remedy; rather, it is one of several available strategies that should be evaluated to ensure its applicability based on site-specific conditions. The first step in any evaluation of NA is the collection of appropriate site characterization data. In general, the data collected need to confirm the occurrence of NA, the effectiveness of RNA, and that the receptors are not exposed to unacceptable risk throughout the period when the site is being remediated by NA. The data collected should be able to answer the following questions and support the activities described in the questions.

- Has the full horizontal and vertical extent of the source and the plume been delineated?
- Is the plume at steady state and is it stable or shrinking in size?
- Can contaminant degradation be demonstrated and quantified?
- Can the long-term behavior of the source and the plume be modeled?
- Can the time frame to achieve remedial cleanup goals be estimated?
- What is the impact of source removal/reduction on the remedial time frame?

Once the site has been characterized to document the feasibility of NA, an evaluation as to the site-specific appropriateness of NA as the preferred remedy should be performed. Remediation by natural attenuation is applicable only at the following types of sites:

- Sites where immediate threats to human health, safety, and the environment do not exist or have been mitigated
- Sites where “active” sources such as leaking tanks, drums, etc. have been removed
- Sites where the projected time frame to achieve remedial objectives is “reasonable,” as defined in section A8.7
- Sites where the plume is stable or shrinking and is not likely to impact current receptors or sensitive habitat
- Sites where active remediation has removed the bulk of the contaminants and the role of RNA is to perform the “final touchup”

- Sites where any necessary institutional controls can be reliably implemented.

Upon selection of RNA as part or all of the preferred remedy, a corrective action plan will be developed to document the selection process and provide details about implementation of the remedy for DEQ approval. At all sites, RNA will be accompanied by long term monitoring to demonstrate that RNA is occurring at the rate anticipated when RNA was selected as the remedial option. Monitoring will continue until the specified cleanup goals have been achieved. If the monitoring data indicate that RNA is not occurring at an acceptable rate, the remedial plan will need to be modified. This is further discussed in the following sections.

A8.4 RISK MANAGEMENT PLAN FOR REMEDIATION BY NATURAL ATTENUATION

At sites where RNA is part of the preferred remedial option, the responsible party should include a discussion in the corrective action plan that addresses the following elements:

- A summary of site characterization activities that demonstrates a thorough understanding of nature and extent of the source and the nature and extent of the impacts, provides data supporting the likely effectiveness of RNA, and discusses any source removal/control activities performed at the site.
- A discussion of remedial endpoints and points of compliance, and the manner in which these were determined.
- A discussion of the time frame over which the endpoints are expected to be achieved.
- A demonstration that during this time frame, risks to human health and the environment are acceptable.
- A discussion of monitoring locations, the rationale for monitoring location selection, and the type and frequency of data that will be collected to monitor the performance of RNA and the achievement of remedial goals.
- A description of the tools to be used to evaluate/analyze the monitoring data.
- A description of the institutional controls that will be required and documentation of their implementation.
- A description of a contingency plan that will be implemented if the monitoring results indicate that RNA is not sufficiently effective or is not proceeding at the expected rate.
- A description of the frequency and form of the reports to be submitted to DEQ during the course of implementing RNA.

A brief discussion of critical components of the RNA portion of the corrective action plan is presented below.

A8.5 SOURCE CHARACTERIZATION AND CONTROL

Characterizing and controlling the source are important aspects of RNA. Sufficient data should be collected during the site investigation phase to delineate the nature and extent of the source and enable the estimation of source lifetime. The term “nature” refers to an evaluation of the chemicals of concern and a determination that the chemicals are amenable to NA. The extent refers to the physical dimensions of the source as well as a determination of the mass of residual chemicals present in the source. An estimate of the lifetime of the source can be made by calculating the mass flux out of the source area (using ground water flow characteristics and contaminant concentrations in the source area) and comparing this to the total contaminant mass in the source area (including free phase product, soils, and ground water).

DEQ requires that all active sources (leaking pipes, tanks, spills, etc.) be stopped and any free phase product in ground water be removed, to the maximum extent practicable. It is best to reduce the source and remediate soils containing residual product that are significant sources of contamination to ground water. Such control measures will reduce the time required to achieve remedial objectives. At a minimum, sufficient source material should be removed to ensure a declining plume. The amount of active remedial activity necessary should be determined on a case-by-cases basis and clearly presented in the risk management plan.

A8.6 PLUME CHARACTERIZATION

The goals of collecting data to characterize the plume are to demonstrate the magnitude and direction of contaminant transport and the stability status of the plume, to confirm degradation is occurring, and to estimate the contaminant degradation rate or the ability of the aquifer to assimilate the contamination.

To achieve these goals, the responsible party must construct wells to account for aquifer heterogeneity and dominant zones of contaminant transport, select appropriate monitoring locations, collect samples at an adequate frequency, and collect and evaluate the appropriate analytical data. How to determine the appropriate monitoring locations, sampling frequency, and data is discussed below.

The location and number of ground water samples collected and analyzed must be determined based on site-specific conditions.

At a minimum, sampling points should be located so as to:

- Locate the distribution of contaminants within the plume,
- Locate the plume boundaries, and

- Track plume movement and migration.

While they do define the extent of the plume, sampling points at non-detect locations provide little useful information for documenting plume characteristics for an NA evaluation. Most sampling points need to be located within the plume boundaries for NA evaluation purposes.

Monitoring wells should be located up-gradient of the source, within or immediately down-gradient of the source area, and within the plume aligned along the plume axis. Data should be collected from a clean downgradient well as well. A downgradient clean well can be used to help characterize the extent of the plume and may be used to protect downgradient receptors by providing early detection of plume movement. This function is described in Section A8.8. Wells delineating the sides of the plume assist in determining if there are significant seasonal changes in ground water flow direction.

As discussed in Sections A8.3.5.1 and A8.3.5.2, data related to the primary and secondary lines of evidence should be collected. In rare cases, it may be necessary to collect data to demonstrate tertiary lines of evidence as well. Based on the data collected, a determination should be made whether the plume is expanding, stable, or decreasing. The specific analytical tools that may be used to conduct this characterization are discussed in Part III of this document.

Expanding plumes require continued frequent monitoring. Depending on site conditions, such as the risk to current or potential future receptors and the rate at which the plume is expanding, additional assessment of the plume and/or source removal and reduction may be necessary. An expanding plume typically requires active remediation.

Plumes documented to be stable or shrinking are candidates for the use of NA. These plumes will also require continued monitoring, though perhaps at a lower frequency than expanding plumes. Depending on site conditions and the time frame of remediation, a stable plume may require residual source characterization or removal.

The frequency and the duration of monitoring during the plume characterization phase should be determined on a site-specific basis and in consultation with DEQ. However, in most cases, one to two years of quarterly monitoring data are necessary to evaluate the degree of seasonal variations in water levels and flow directions present at a site. This information is necessary to characterize a plume as expanding, stable, or shrinking and to estimate degradation rates. As clear trends emerge in the data, the monitoring frequency may be modified. The actual duration of sampling will depend on the time it takes to demonstrate a clear trend in the concentrations.

A8.7 REASONABLE TIME FRAME DETERMINATION

The determination as to what constitutes a reasonable time frame for RNA is a complex, site-specific determination not amenable to simple rules of thumb or quantification. In

making this determination DEQ will take into account factors that include, but are not limited to:

- The time frame for RNA compared to that for other remedies being evaluated.
- The time frame in which affected portions of the aquifer might be needed for various uses.
- The likelihood that impacted ground water will be utilized.
- The degree of uncertainty in site characterization and NA estimates.
- The reliability of institutional controls over the time frames for which they may be required to function.
- The ability of the responsible party to maintain the required monitoring and plume evaluation required when NA is used as a remedy.

A8.8 MONITORING TO DEMONSTRATE THE EFFECTIVENESS OF REMEDIATION BY NATURAL ATTENUATION

Due to the uncertainties associated with the site-specific implementation of RNA, long-term monitoring is necessary to demonstrate its effectiveness. Long-term monitoring is used to ensure that the behavior of the plume does not change (EPA, 1999) and that predictions of plume behavior are accurate. The objectives of long-term monitoring are to demonstrate NA is continuing to occur, human health and the environment are being protected, and the plume is not expanding.

The specifics of the monitoring plan (e.g., the location, frequency, and type of samples to be collected and the analytical procedures to be used) should be determined on a site-specific basis. The primary factors that should be considered when designing a long-term monitoring program include:

- Distance to potential receptor exposure points
- Ground water seepage velocity and direction
- Types of contaminants
- Aquifer heterogeneity
- Three-dimensional distribution of chemicals of concern
- Areas of unique geochemical conditions
- Surface water impacts
- Effects of active remediation systems (Wiedemeier et al., 2000)

The secondary factors that should be considered include:

- Access issues
- Property lines
- Contaminant contributions from offsite sources (Wiedemeier et al., 2000)

Two types of wells will be required for any long-term monitoring program: performance monitoring wells and contingency monitoring wells. Performance monitoring wells are used to demonstrate that NA is proceeding according to expectations; document that geochemical conditions continue to be adequate to support NA processes; identify any toxic products resulting from NA processes; determine if plume conditions remain stable or shrinking; identify changes in ground water conditions, such as change in flow direction, recharge, etc.; and document that cleanup criteria have been met.

Contingency monitoring wells are placed beyond the predicted downgradient boundary of the plume and up-gradient from known or potential receptor exposure points. Their purpose is to provide an “early-warning” if unexpected plume expansion occurs and allow implementation of a contingent remedy if needed. Multiple contingency wells may be needed, particularly if seasonal variations in ground water flow direction are known to occur.

Sampling frequency decisions should be based on:

- The natural variability observed in contaminant concentrations,
- The distance and travel time from the source to the point of compliance, and
- The reduction in concentrations needed to meet target levels (EPA, 1998).

A8.9 CONTINGENCY MEASURES

The RNA corrective action plan should include a contingency plan to be implemented if the site data indicate that RNA is not occurring at the expected rate or the exposure conditions at the site have changed, resulting in an unacceptable risk to human health or environment.

Contingency measures will prevent delays in site remediation and provide a clear roadmap for site remediation. Triggers should be established and included in the plan that would cause the responsible party to implement alternative active strategies to enhance RNA. The triggers should be as objective and quantitative as possible. Examples of triggers that would cause the responsible party to implement alternative strategies include, but are not limited to:

- a consistent increase in concentrations in one or more wells,

- a failure of any of the institutional conditions necessary to protect human health and the environment during the period of RNA,
- a change in the exposure conditions (e.g., the removal of a pavement),
- continued expansion of the plume, or
- unacceptably low rates of RNA.

PART III: TECHNIQUES AVAILABLE TO DEMONSTRATE NATURAL ATTENUATION

Several techniques are available to evaluate the data collected to demonstrate NA or to design and implement an RNA program. These techniques can be divided into three categories: techniques to demonstrate the occurrence of NA, techniques to estimate the site-specific rate of NA, and techniques to quantify the future behavior of the plume. The available techniques for each of these evaluations are presented below:

A8.10 TECHNIQUES TO DEMONSTRATE THE OCCURRENCE OF NATURAL ATTENUATION

The occurrence of NA may be demonstrated by using one or a combination of graphical and statistical techniques. The specific techniques used will vary depending on site conditions and the specifics of the data. To the extent possible, multiple techniques should be used to provide added insight into the NA process.

A8.10.1 Graphical Techniques

Chemicals of concern data collected from strategically located monitoring wells should be used to draw site-wide contour maps of individual constituent concentrations for each monitoring event, create concentration vs. time plots for each well with detectable constituent levels and at least four rounds of data, and create concentration vs. distance plots along the flow direction for several monitoring events. Depending on the variability in the concentrations, it may be better to plot the natural logarithm of concentration vs. time and distance. An example plot is shown in Figure A8.4. When creating these plots, care should be taken to ensure that the selected scale clearly demonstrates the trend. Since the concentrations are affected by water level fluctuations, it is important to also plot water levels as a function of time.

These plots can indicate whether the concentration trend is decreasing, stable (no significant trend), increasing, or mixed. The latter refers to a situation where different wells (source wells vs. periphery wells) exhibit different trends. Increasing concentrations in the source well and decreasing concentrations in the downgradient wells may occur due to a variety of reasons. For example, the mass loading to the source may cause an increase in the source wells due to an increase in the infiltration rate, or the rate of biodegradation near the source may be reduced due to a depletion of oxygen.

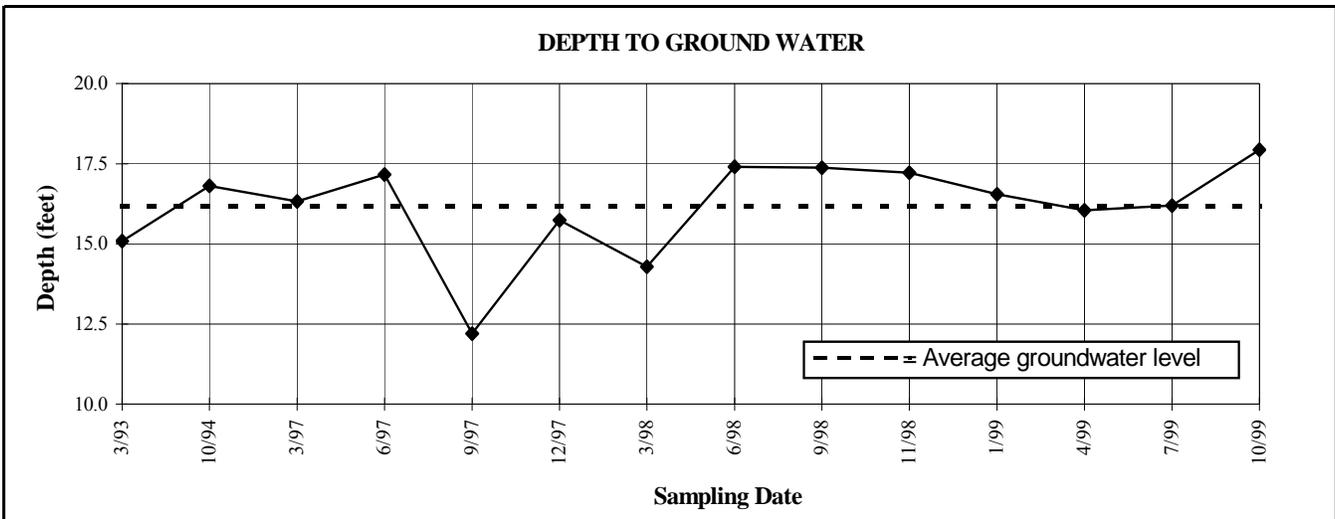
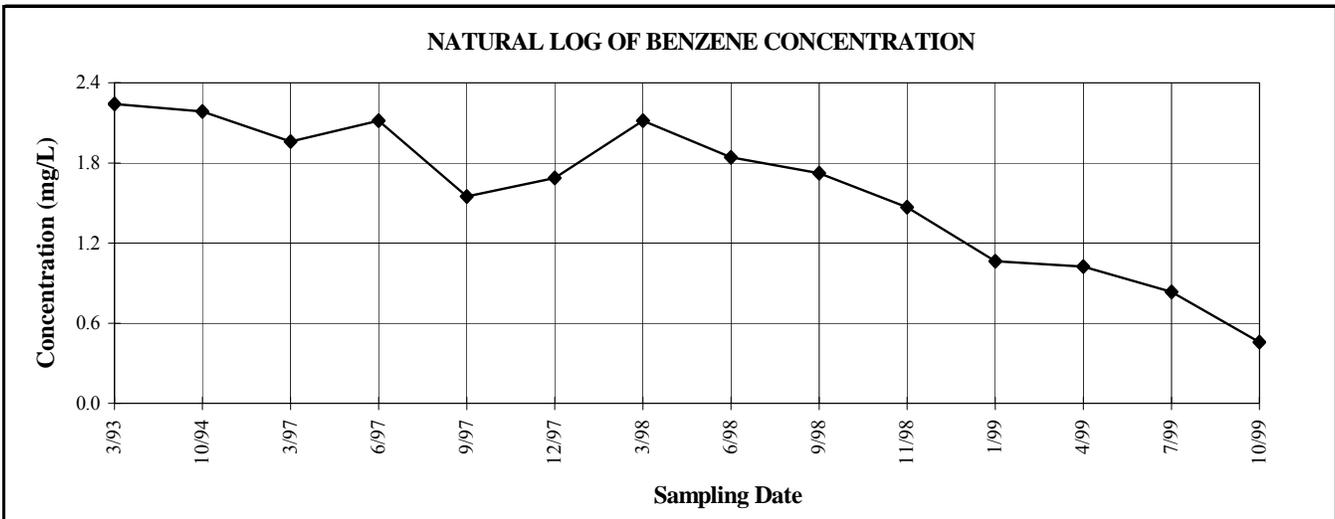
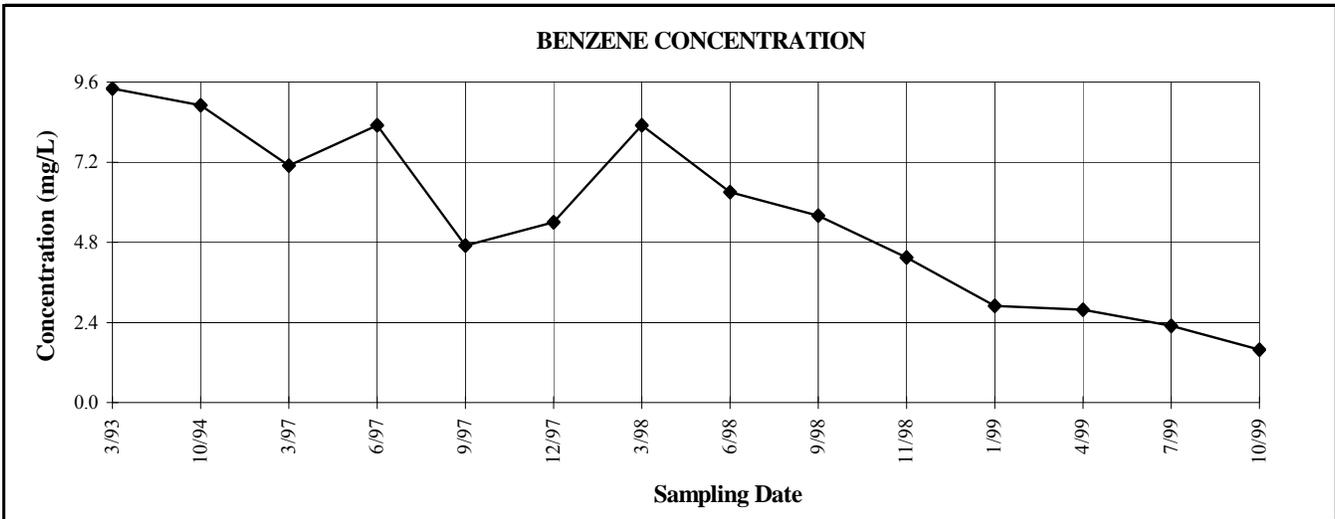


Figure A8.4. Concentration vs. Time Plot of Benzene

Conversely, increasing concentrations in downgradient wells and decreasing concentrations near the source may indicate that the plume is moving but the source has depleted. Conclusions related to concentration trends based on visual observations of the data must be supported by statistical analysis.

In addition to the chemical of concern concentrations, indicator chemical concentrations should be plotted along the plume axis (concentration vs. distance plots) along with the hydrocarbon concentrations. The observed pattern of concentrations can be used to demonstrate NA. For example, low dissolved oxygen concentrations within the plume and higher concentrations up-gradient and down-gradient of the source are indicative of biodegradation within the plume.

A8.10.2 Statistical Evaluations

Statistical tools may be used to determine and quantify the concentration trend. These tests can be used to test a null hypothesis and an alternative hypothesis. A null hypothesis might be that there is no time trend in the concentrations vs. distance or time and the alternative hypothesis might be that there is a downward trend. Application of the statistical test would then result in the acceptance or rejection of the null hypothesis at a specified level of significance.

A non-parametric test, called the Mann-Kendall test, is often used to determine whether a trend exists in the data. This test is particularly useful for environmental data for several reasons:

- The test is non-parametric, which implies that the test is applicable irrespective of the underlying distribution of the data.
- The test is simple to implement.
- Concentration values below the detection limit can be used.
- The results are not affected by missing data.

The Mann-Kendall test is applicable only when there is no seasonality in the data. This is the case if the data do not show any seasonal variations or the data were collected from one season. When data indicate seasonality, the seasonal Kendall test may be used. For details on both of these tests, refer to Gilbert (1987), Gibbons (1994), or other books on statistical analysis.

DEQ strongly recommends the use of the Mann Kendall test to determine the trend in non-seasonal data except in situations where a visual plot of data indicates without **ANY** ambiguity that a trend exists in the data.

If the concentration vs. time or concentration vs. distance data indicates a decreasing trend, a regression analysis may be used to estimate the slope of the best-fit line.

As explained in Section A8.10.6, the slope of the line can be used to estimate the NA or the biodegradation rate. For additional information on regression analysis, refer to any statistics textbook.

A8.10.3 Evaluation of Plume Behavior with a Recalcitrant Tracer

Physical, chemical, and biological processes act together to decrease contaminant concentrations away from a source. However, monitored NA requires that accurate biodegradation rates for a site be known. To estimate accurate biodegradation rates, conservative tracers can be employed. The concentrations of these tracers are not affected by biodegradation processes and so can be used to delineate between the affects of biodegradation and other NA processes such as dilution, dispersion, and sorption. Generally, tracers are biologically recalcitrant, and have chemical properties similar to the contaminant of concern. Examples of common tracers include MTBE for petroleum hydrocarbon plumes.

A8.10.4 Techniques to Estimate the site-specific rate of natural Attenuation

The data collected to demonstrate the primary line of evidence of NA can be used to estimate site-specific NA rates and biodegradation rates. Since NA includes multiple processes in addition to biodegradation, the NA rate would be higher than the biodegradation rate. The latter can be used as an input into a ground water fate and transport model, such as Domenico's model (Domenico, 1987), to estimate the future migration of the plume and to estimate a site-specific dilution attenuation factor. The methods available to estimate the NA rate include (1) mass balance analysis for expanding, stable, or shrinking plumes; (2) plume concentration vs. time plots; and (3) plume concentration vs. distance plots. Descriptions of each of these methods are presented below. An excellent discussion of the calculation and use of rate constants for use in natural attenuation evaluations is presented in Newell, et al, (2002).

A8.10.5 Mass Balance Analysis

This method of estimating the NA rate is based on the concept of mass balance. For a stable plume, the mass entering the ground water plume must equal the mass lost by NA. Thus, if the mass entering the plume can be estimated, it should be possible to estimate the NA rate. A detailed description of the application of mass balance analysis to estimate the NA rate of a petroleum release is described in Section X6.1 of the Standard Guide for Remediation of Groundwater by Natural Attenuation at Petroleum Release Sites (ASTM, 1998).

A8.10.6 Well Concentration vs. Time Plot

The estimate of the overall attenuation rate for a shrinking plume can be calculated assuming a first order decay rate, mathematically represented as:

$$\frac{dC}{dt} = \exp^{-kt} \quad (\text{A8.1})$$

Where:

k = NA rate [1/yr]

The solution to the above differential equation results in the familiar exponential decay:

$$C(t) = C(t = 0) \exp^{-kt} \quad (\text{A8.2})$$

Where:

C(t) = Concentration at any time t (mg/L)

By taking the natural logarithms of both sides of Equation A8.2,

$$\ln C(t) - \ln C(t = 0) = -kt \quad (\text{A8.3})$$

Thus a plot of natural log of concentration vs. time would plot as a straight line with a slope equal to “k”: the NA rate.

A8.10.7 Well Concentration vs. Distance Plot

Recognizing that advective travel time can be expressed as:

$$t = \frac{x}{v} \quad (\text{A8.4})$$

Where:

x = Advective travel distance (cm)

v = Seepage velocity (cm/yr)

By substituting equation A8.4 in equation A8.2, equation A8.2 becomes:

$$C(t) = C(t = 0) \exp\left(-k \frac{x}{v}\right) \quad (\text{A8.5})$$

Taking natural log of both sides of the equation,

$$\ln[C(t = 0)] - \ln[C(t)] = -k \frac{x}{v} \quad (\text{A8.6})$$

For a shrinking plume that follows the first order attenuation rate presented above, a plot of log concentration vs. distance would plot on a straight line with a slope of k/v . By multiplying the slope with the seepage velocity, the NA rate, k , can be estimated.

Buscheck and Alcantar (1995) used the solution of the one-dimensional transport equation with biodecay to estimate the biodegradation rate based on the slope of the log concentration vs. distance plot. Specifically, they derived the following expression for the biodecay rate:

$$\lambda = \frac{v}{4\alpha_x} \left\{ \left[1 + 2\alpha_x \left(\frac{k}{v} \right) \right]^2 - 1 \right\} \quad (\text{A8.7})$$

Where:

λ = Biodecay rate, assumed to occur at equal rates in the dissolved and sorbed phases

α_x = Longitudinal dispersivity (0.1 x)

Zhang and Heathcote (2003) modified this method to account for situations with finite source size and lateral dispersion to improve the estimates of the biodegradation rate.

The following step-by-step description of the process can be implemented on a site-specific basis.

- Step 1: Determine the ground water flow direction based on the water level measurements for each monitoring event.
- Step 2: For each monitoring event, identify the wells located along the direction of flow (i.e., along the plume center line). Since the flow direction may vary seasonally, different wells may be used for different monitoring events.
- Step 3: Tabulate the concentrations of the chemicals of concern and calculate the natural log concentrations.
- Step 4: Plot the natural log concentrations on the Y-axis and the distance along the X-axis.
- Step 5: Calculate the slope of the best-fit line and the confidence in this estimate by examining the 95% confidence limits of the slope.
- Step 6: Estimate the ground water seepage velocity
- Step 7: Multiply the slope of the best-fit line calculated in Step 5 with the seepage velocity.

The result will represent the overall NA rate. This NA rate represents the reduction in concentration due to the combined influence of the various NA processes mentioned in Section A8.2. This decay rate should not be confused with the biodegradation rate (λ) that is an input to ground water models (Section A8.13).

- Step 8: Estimate the biodecay rate from Equation A8.7.

The above steps 1 to 8 should be completed for each time period for which data are available and the results presented as a range of NA and biodecay rates. The latter can be used as an input to the Domenico model (Domenico, 1987) to estimate the dilution attenuation factor. Due to confounding factors such as seasonal variations in ground water velocity, fluctuations in water levels, and errors in sampling and analysis methods, the NA and biodecay rates may vary significantly (by as much as a factor of 10). Therefore, it is best to present the range as well as the average rates.

A8.11 TECHNIQUES TO QUANTIFY THE FUTURE BEHAVIOR OF THE PLUME

The future behavior of the plume can be estimated by using fate and transport models. A number of analytical and numerical models are available.

Commonly used analytical models include the Domenico model (Domenico, 1987), and BIOSCREEN,. BIOSCREEN can be downloaded from:
www.epa.gov/ada/csmos/models/bioscrn.html.

These models can be used to estimate plume length, concentrations at downgradient receptor locations, and dilution attenuation factors and can be calibrated to site-specific ground water data . The correct application of fate and transport models requires experience and specialized knowledge that is beyond the scope of this document.

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APPENDIX A-9: ESTIMATION OF EXPOSURE POINT CONCENTRATIONS IN SOIL AND GROUND WATER

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A9.1 BACKGROUND

Exposure point concentrations are the **average** chemical concentrations to which receptors are exposed over a specified duration within a specified geographical area. The geographical area about which a receptor moves and contacts contaminated media during the specified exposure duration is termed an exposure unit (EU). Exposure point concentrations are also often referred to as representative concentrations.

The following sections describe the concept and the methodology that should be used to estimate the exposure point concentrations. This guidance is an attempt to provide general recommendations on procedures to accurately determine exposure point concentrations. It is not expected that these recommendations will apply to all sites, particularly large, complex sites. Site-specific circumstances may require consultation with the Department of Environmental Quality (DEQ), the application of professional judgment, and reference to the more detailed literature cited herein.

In the site-specific application of the risk evaluation process, exposure point concentrations are used to estimate the risk to a specified receptor for each complete route of exposure identified in the site conceptual exposure model (SCM) and each chemical of interest (COI). Risk management decisions are then made based on a comparison of the estimated risk with the regulatory specified target risk. This is termed a forward mode calculation. Exposure point concentrations can also be used in what are termed backward mode calculations when they are compared with calculated target levels for each complete route of exposure and each COI. In either mode the calculation of exposure point concentrations is critical in the outcome of the risk evaluation.

Complications in the calculation of the exposure point concentrations may arise because the concept of exposure point concentration is often mistakenly associated with a site as opposed to an exposure pathway or the source. Since there may be several complete pathways at a site, several exposure point concentrations, one for each complete pathway, should be estimated.

The accurate estimation of exposure point concentrations is complicated by several factors, including:

- (i) spatial variability in the concentrations;
- (ii) temporal variability in the concentrations;
- (iii) lack of sufficient, appropriately located, site-specific concentration data; and
- (iv) poor definition or uncertainty in the location, size, or other characteristics of the EU.

The uncertainty in the exposure point concentration introduced by some of these factors can be reduced through giving them adequate consideration during the development of the SCM and the sampling and analysis plan.

After samples have been collected and analyzed, the results need to be appropriately evaluated to produce sound estimates of exposure point concentrations. This evaluation includes:

- an assessment of data quantity,
- data quality (which data are acceptable for use),
- statistical methods (whether and which methods to use), and
- determination as to which data (of that which is useable) apply to a specific EU.

This guidance focuses primarily on the latter two issues.

A.9.2 STATISTICAL CONSIDERATIONS FOR ESTIMATING EXPOSURE POINT CONCENTRATIONS

Numerous statistical methods can be employed to develop estimates of the exposure point (average) chemical concentration to which a receptor will be exposed. These methods include examining the maximum detected concentration, upper confidence limit (UCL) of the mean (for example the 95% UCL), arithmetic average, area-weighted average, depth-weighted average, geometric average, and volumetric average concentration (very rarely used). Associated with each of these methods are certain advantages, disadvantages, and constraints on their appropriate use. There is no uniformly accepted statistical methodology to estimate the exposure point concentration. Implicit in the decision to use any particular method is the need to acknowledge and account for the representativeness of the samples collected, the homogeneity of the EU that is defined, the statistical distribution of the data, the minimum data requirements of the statistical method used, and the uncertainty in the resultant data used to derive the estimated concentration.

From a practical perspective, several factors common to petroleum release sites may make the use of statistical methods to develop exposure point concentrations at a given site unrealistic, particularly for ground water. These factors include:

- Small release areas.
- Dominantly subsurface releases, often at great depth.
- Focus on source areas and not exposure pathways.
- Limited sample numbers due to temporal/spatial constraints.

A9.2.1 Maximum

The use of the maximum detected chemical concentration is required for comparison to Screening Levels during the screening level evaluation. Depending on the quality of the site characterization data available, the maximum can be used as exposure point concentrations in site specific risk evaluations and will typically represent a conservative estimate of the average concentrations. This will particularly be the case when sample numbers are low (i.e., less than 8-10).

The effort necessary to calculate exposure point concentrations for certain complete pathways can be avoided by using the maximum media-specific concentrations when they do not exceed the target levels or when the cumulative risk, calculated using maximum concentrations, does not exceed the target risk.

A9.2.2 Upper Confidence Limit

For the calculation of exposure point concentrations, the Environmental Protection Agency (EPA) has recommended, in most cases, using the 95% Upper Confidence Level (UCL) of the mean (EPA, 1992). The rationale for using this parameter as an estimate of the mean of a dataset and its calculation using this method is discussed in more detail in section A.9.6. Ideally, a minimum of eight to ten samples is desirable to generate a 95% UCL. With lower sample numbers the 95% UCL estimate tends to be larger than the arithmetic average and will sometimes exceed the maximum measured concentration. In these instances the maximum measured concentration can be substituted for the 95% UCL. EPA has developed technical guidance, a users guide and computer software (ProUCL 4.0) for calculating the UCL based on parametric (normal and lognormal distributions) and nonparametric distributions and when data sets have non-detect (ND) observations (EPA, 2010a, 2010b). For simpler datasets (with few non-detect values) the DEQ has developed the IdahoUCL software which is available at:

<http://www.deq.idaho.gov/Applications/Brownfields/index.cfm?site=register.cfm>

A9.2.3 Arithmetic Average

The use of the arithmetic average is similar to the UCL with the disadvantage that no estimate of the uncertainty or variability of the average is incorporated into the value generated. As the number of samples approaches 20 to 30, the estimates generated using the 95% UCL versus the straight arithmetic average tend to converge.

A9.2.4 Geometric Average

The geometric average is sometimes used as an estimator of the mean of lognormally distributed variables. It represents the value in the original scale of the mean of the transformed variable. It is, however, a biased estimate of the mean, and statistical texts such as *Statistical Methods for Environmental Pollution Monitoring* (Gilbert, 1987) caution against its use in environmental applications. *Statistical Methods for Environmental Pollution Monitoring* (Gilbert, 1987) or *ProUCL 4.0 Technical Guide* (EPA, 2010) should be consulted when attempting to develop an unbiased estimate of the mean of a lognormally distributed variable. Exploratory data analysis should be conducted to confirm an assumption that the variable is lognormally distributed prior to calculating an exposure point concentration. As with the arithmetic average, no estimate of the uncertainty or variability is incorporated into the value generated by the geometric average and may not be conservative.

A9.2.5 Area-Weighted Average

Where sampling locations are unevenly spaced, area-weighted averaging methods can be employed to generate an estimate of the average concentration across an area. This is done by generating an area (or Thiessen polygon) associated with each sampling location, assigning a “weight” to each data point based on the area of the polygon associated with that point, and summing the weighted data point values. One advantage of the method is that it is useful in characterizing areas when the number of sample points is low. There are also several disadvantages. First, the shape, and consequently, the contribution of an area associated with a sample location to the “average” is totally dependant on the spatial distribution of all data points and may not be reflective of the true distribution of contaminants at a site. Second, since each polygon is associated with one sample point, no estimate of the accuracy or error in the average value is possible. Finally, the method, unlike several other interpolation schemes, does not assume that points that are closer together are more similar than points that are farther apart. The method for calculating an area-weighted average using Thiessen polygons is discussed in section A9.6.

A9.2.6 Depth-Weighted Average

Depth-weighted averaging methods are used to develop an average or exposure point concentration for a specific borehole where multiple samples at varying depth intervals have been obtained. In characterizing a source area with multiple boreholes, the depth-weighted averages from each borehole can be used in a 95% UCL calculation. The methodology for depth-weighted averaging is described in EPA’s *Soil Screening Guidance: User’s Guide* (EPA, 1996).

A9.2.7 Volume-Weighted Average

Volume-weighted averaging methods are a combination of area and depth weighted averaging techniques. They are rarely used in risk assessment evaluations.

A9.3 GENERAL CONSIDERATIONS FOR ESTIMATING EXPOSURE POINT CONCENTRATIONS

Estimating exposure point concentrations requires the consideration of several issues. Prior to performing the computations consider the information in the following sections.

A9.3.1 Surface and Subsurface Soil Concentrations

When evaluating exposure point soil concentrations consider the following:

- The spatial resolution of the data must be sufficient. While the exact number of necessary samples cannot be specified, data should be available from areas of known or likely sources and the EU should be defined for a given pathway and receptor.
- If the data are “old” (> 4 years old) and the concentrations exceed the Screening Levels, or a new spill is suspected, it may be useful to collect recent data. This particularly applies if the COC are susceptible to biodegradation (such as petroleum hydrocarbons) or other attenuation mechanisms. If sufficient new data are collected, they may be used for risk evaluation and the old data may be disregarded. A new release will always require the collection of additional data.
- If there is a “high” density of soil samples (> 30) for a homogeneous EU and sample locations are approximately equally spaced, the arithmetic average may be used instead of the 95% UCL or the area-weighted average. This is acceptable because the area-weighted average, the arithmetic average, and the UCL concentrations will tend to converge (EPA, 1992). The > 30 value mentioned above should also be considered in relation to the size of the EU and may not be appropriate for very large EU.
- Non-detect soil samples located at the periphery of the EU (e.g., the footprint of a building) should not be used.
- Non-detect samples (also referred to as left-censored data) located within the EU require special treatment. The EPA has recently discouraged the use of replacement methods (such as half the detection limit) (EPA, 2007). The proportion of non-detect samples in the subject data set and whether multiple detection limits exist will affect the specific methods to be used to generate summary statistics and UCL. The EPA ProUCL 4.0 software has several options for handling left-censored data. Consult the technical guidance accompanying the software to determine which method is most appropriate for the specific dataset and how to treat the censored data.
- If multiple surficial soil samples and/or multiple subsurface soil samples are available from the same borehole within the EU, the depth-average or arithmetic average

concentration of these samples may be used. If the samples are equally spaced, the depth-averaged concentration will be the same as the arithmetic average concentration.

- An alternative to discrete soil samples to calculate the UCL is to use incremental sampling (USACE, 2009; Hawaii, 2008; Alaska, 2009). Incremental sampling is a sampling approach to obtain a single sample for analysis that has an analyte concentration representative of the EU. While it is similar to composite sampling, the approach takes into account sample size to reduce variability and also allows for the calculation of a UCL while only requiring a few samples for laboratory analysis. It typically requires greater up front planning with respect to sampling design, methodology and defining of data quality objectives than traditional composite sampling.
- If vapor intrusion is a potentially complete pathway, the collection of soil vapor data, in lieu of soil samples, for characterizing the potential risk should be considered. Consult Appendix A-7 (Evaluation of the Vapor Intrusion Pathway) and Section A.9.4.5 of this appendix for sampling details.

A9.3.2 Ground Water Concentrations

Follow the guidelines listed below to account for the temporal and spatial variation in ground water concentrations. These recommendations apply primarily to evaluation of ground water data for the purpose of estimating exposure point concentrations for risk evaluation. They are not intended where other monitoring objectives, such as determining compliance with cleanup criteria, are the primary goal.

- (a) For wells with a clear increasing or a decreasing trend, data from the most recent 12 months or the four most recent measurements should be averaged (use whichever covers the longer duration). Note that for wells with increasing trends, continued monitoring will be required until the trend stabilizes or decreases.
- (b) For wells with stable or fluctuating concentrations with no apparent trend, data from either the most recent 24 months or the eight most recent measurements should be averaged.
- (c) If site ground water analytical data is limited (number of wells or number of sampling events) and prevents adequate statistical analysis the use of the maximum concentrations is preferred. The use of the average concentration is discouraged, particularly if the plume stability status (increasing, decreasing, or stable) with respect to the release is unknown or the representativeness of the available data is in question.
- (d) While developing the exposure point concentration for (a) and (b), the treatment of left-censored data (concentration below detection limits) deserves special consideration and may require specialized analysis techniques. Replacement techniques (such as using half the detection limit) are currently discouraged by the EPA (EPA, 2010a). If the percentage of non-detects is a significant percentage of the total number of data points (> 25

- percent) the representativeness of the data set for the exposure unit in question should be evaluated.
- (e) Wells with concentrations consistently below detection limits in the periphery of the EU should not be used.
 - (f) For wells that contain free product where it is not possible to obtain a representative dissolved phase sample, the use of the effective solubility of COC should be considered as a conservative surrogate for their chemical concentration in estimating exposure point concentrations.

Two useful documents that provide guidance on the statistical evaluation of groundwater monitoring data are the EPA Unified Guidance (EPA, 2009) and DEQ guidance on statistical evaluation of groundwater data for determining background and degradation (DEQ, 2009).

A9.4 CALCULATION OF EXPOSURE POINT CONCENTRATIONS

An exposure point concentration is necessary for each complete exposure pathway at a site. Based on the pathways typically considered in the risk evaluation process, the exposure point concentrations listed below are typically needed for each media.

A9.4.1 *Surficial Soil (0-1 foot below ground surface)*

The risk evaluation process requires consideration of two pathways of exposure associated with the surficial soil: (i) the ingestion of chemicals in ground water due to leaching of residual chemicals present in the surficial soil, and (ii) the accidental ingestion of soil, outdoor inhalation of vapors and particulates from surficial soil emissions, and dermal contact with surficial soil. These are referred to as the ground water protection and direct soil contact pathways, respectively. Thus at most, two different surficial soil exposure point concentrations are required.

A9.4.1.1 Exposure point surficial soil concentration for the protection of ground water

Figure A9-1 shows a schematic of the soil leaching to ground water pathway. The evaluation of this pathway for surficial soil assumes that the contamination does not extend greater than one foot below ground surface. If this is not the case then samples taken in the surficial soil zone should be included with those from greater depth and evaluated together.

The conceptual model for this pathway also assumes that the leachate from the surficial (or subsurface) soil source travels vertically downwards to the water table without any lateral or transverse spreading. Thus the horizontal dimensions of the surficial (subsurface) soil source and the ground water source are identical. Estimating the source dimensions requires considerable professional judgement. Factors that are typically considered in making these estimates include historical knowledge of where a spill or

source was located, visual clues such as soil discoloration, and laboratory data (taking care not to include samples with non-detect results).

Irrespective of the manner in which the source area is identified, it is important to indicate the dimensions of the source on a map. The exposure point surficial soil source concentration should be estimated using only the surficial soil data collected within the delineated source zone. The statistical method used to derive the exposure point concentration should be appropriate to the quantity and characteristics of the data available, typically the UCL of the mean or an incremental sampling approach.

A9.4.1.2 Exposure point concentrations for the direct contact pathway

For this pathway, the exposure point surficial soil concentration has to be based on the receptor's EU (i.e., the area over which the receptor may be exposed to the surficial soil). The exact location of this area is often very difficult to estimate since it must be representative of a period of time equal to the receptor's exposure duration (for example, up to 30 years for residential land use and about 7 years for non-residential land use). In most cases it is reasonable to assume that the receptor will access all portions of the EU in a random manner. Under current conditions, in the absence of specific information about the receptor's activities, the unpaved portion of the site may be approximately considered as the receptor's EU. Where volatile organic compounds (VOCs) are included in the list of potential COC and/or the paved portion is in poor condition or consists of a material that does not limit VOC migration, this guide would not apply. For potential future exposures, if the current condition cannot be assumed to occur, the assumption should be made that the pavement is removed, exposure to surficial soil is possible, and the entire site should be considered as the EU.

If the possibility exists that, for a future use scenario, subsurface soil that is contaminated may be brought to the surface and result in direct contact exposures at the surface the appropriate subsurface data should be included in the estimate of the exposure point concentration.

To estimate the exposure point concentration for this pathway, it would be necessary to estimate the receptor's area of exposure and determine the number of soil samples available within this EU. This information should be used to estimate the 95% UCL or an area-weighted average concentration using the procedures discussed in Sections A9.5 and A9.6, respectively. The use of an incremental sampling approach for characterizing exposure point concentrations for this route of exposure may be particularly well-suited and efficient.

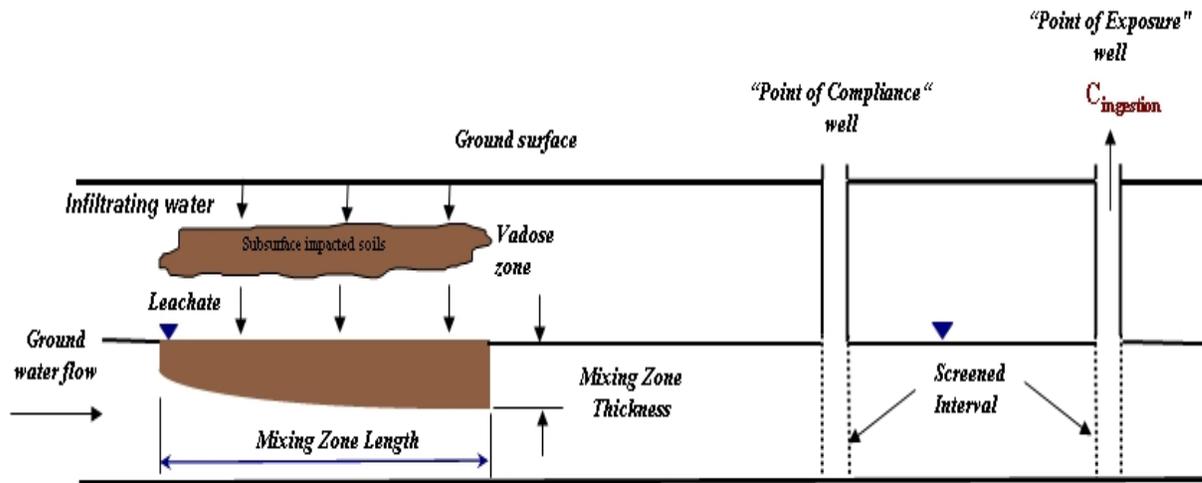


Figure A9-1. Schematic of Soil Leaching To Ground Water

A9.4.2 Subsurface Soil (greater than 1 foot below ground surface)

The risk evaluation process includes two pathways of exposure associated with the subsurface soil: (i) the ingestion of chemicals in ground water or exposure to surface water impacted by discharge of contaminated ground water resulting from leaching of chemicals in subsurface soil, and (ii) indoor inhalation of vapor emissions. Thus, two different subsurface soil exposure point concentrations are required (one for each complete pathway). Additionally, exposure point concentrations may be required if the receptor's EU for current and future conditions is different.

A9.4.2.1 Exposure point subsurface soil concentration for protection of ground water

The leachate from the subsurface soil source is assumed to travel vertically downwards without any lateral or horizontal spreading (Figure A9-1). Thus, the exposure point concentration for this pathway should be based on the subsurface soil concentrations measured within the source area.

As in the case of the surficial soil concentration protective of ground water, discussed in Section A9.4.1.1, the exposure point subsurface soil source concentration would be the average concentration calculated using the data within the soil source area. If the source area is small (several tens of feet across) typically few (1-5) soil samples are available. In this case, the maximum concentration within the subsurface soil source should be used as an approximation for the average concentration if it can be considered representative. If the sample numbers for applicable data are adequate (>8) the 95% UCL may be appropriate.

A9.4.2.2 Exposure point subsurface soil concentration for vapor intrusion

The use of soil concentration data and development of exposure point soil concentrations for evaluation of vapor intrusion, while allowable, is not as desirable as the use of soil vapor data. The use of soil vapor data is discussed in more detail in Appendix A-7, Evaluation of the Vapor Intrusion Pathway and in Section A9.4.5 of this appendix.

The default methodology and model used to estimate the risks resulting from the indoor inhalation of vapors emanating from a contaminated subsurface soil source is the Johnson and Ettinger (J and E) model (Johnson and Ettinger, 1991). The J and E model assumes that the chemicals volatilize from a subsurface soil source, travel vertically upwards via diffusion without any lateral or transverse spreading, and enter the building via advection through cracks in the foundation. Because this model does not account for biodegradation (an important attenuation process for petroleum hydrocarbon chemicals), the predictions are generally considered conservative for these chemicals. Other models which do incorporate biodegradation, such as the Biovapor model (API, 2010) may also have applicability.

To be completely consistent with the J and E conceptual model, the exposure point concentration for this pathway would be based on the soil concentrations measured in the soil directly below the enclosed space. In many cases this is not possible and, depending on site conditions (such as the location of pavement, preferential pathways, and site lithology), vapors from source areas adjacent to but not under an existing structure may contribute to indoor inhalation exposures. The goal should be to characterize the average soil concentration in the source area that may potentially contribute vapors to any existing or potential future structures. If the pathway is considered complete for current conditions, appropriate samples for exposure point concentration estimates should be selected to achieve this goal focused in the immediate vicinity of any existing structures as well as those within 50 feet of the structure. If free product is suspected or known to exist the area around the structure should be extended to 100 feet. If current and reasonably anticipated future land uses are the same, the exposure point concentration calculation is unchanged.

To evaluate exposure point concentrations for potential future vapor intrusion (e.g., in the event that an enclosed structure is constructed on top of contaminated soil), it is

necessary to determine the nature of any future structure and estimate the size (footprint) of the structure and its location.

If the location and characteristics of future structures are known, the exposure point concentration should be conservatively estimated using samples from that vicinity including the buffers mentioned above for existing structures. If the nature of future structures is not known the assumption should be made that a structure could be placed anywhere on the property in question and potentially located directly over the source. The size of the structure would be assumed to be similar to that of the likely future land use, in most cases either residential or non-residential. The default size of a residential structure assumed in this guidance is approximately 40 feet by 40 feet. For sites where the footprint of the current and likely future enclosed spaces are different, different exposure point subsurface soil concentrations (one for current conditions and one for future conditions) may be necessary. The 95% UCL or area-weighted average methods may be used, as appropriate. Where multiple boreholes with several depth interval samples are available, a depth-weighted average from individual boreholes can be developed.

A9.4.3 Exposure point Concentration for Protection of a Construction Worker

The risk evaluation process includes the evaluation of one pathway of exposure for construction workers: accidental ingestion, dermal contact, and outdoor inhalation of vapors and particulates from soil.

For the construction worker, no distinction is made between the surficial and subsurface soil because during construction subsurface soils may be exposed. To estimate the exposure point concentration for the construction worker, it is necessary to identify the depth, areal extent, and number of samples taken within the zone of construction. The potential future depth of construction can be estimated by contacting local construction firms and identifying the typical depth of utilities on and adjacent to the site. If the areal extent of the construction area is not known, conservatively it may be estimated as the source area. If sample results are available for several depth intervals these should be averaged using depth-weighting. The depth-averaged values from multiple boreholes could then be combined to calculate a 95% UCL or area-weighted average, as appropriate. The exposure point concentration would be the depth-averaged concentration within this zone of construction.

A9.4.4 Ground Water

The risk evaluation process requires the evaluation of two routes of exposure associated with shallow ground water: (i) ingestion of water and (ii) indoor inhalation of vapor emissions from ground water. Where multiple aquifers are present, the shallowest aquifer is typically the aquifer first considered for both pathways. Site-specific circumstances,

such as disappearance of the shallow aquifer or transport of contamination to the deeper aquifer may require evaluation of both aquifers. Characterization of chemical concentrations in both aquifers should still be performed. Thus, at a minimum two different ground water exposure point concentrations, one for each complete pathway, are required.

A9.4.4.1 Exposure point compliance well concentration for protection of ground water

For the ingestion of ground water pathway, maximum contaminant levels (MCL) or equivalent concentrations have to be met at the point of exposure (POE) location. Often the point of exposure well location is hypothetical and data may not be available. Alternatively, if a point of exposure well is present an upgradient sentry or compliance well is often used as a early warning monitoring location. In both of these cases ground water transport models are used to calculate the predicted concentrations at the point of exposure based on source area concentrations, the allowable concentrations in the source area, or an alternate point of compliance location concentration that will result in acceptable concentration at the point of exposure. In any case, exposure point concentrations will need to be estimated for the source area or for the alternate point of compliance location. In addition, one or more compliance wells have to be identified and target compliance well concentrations (typically higher than the exposure well concentration) have to be calculated at these wells.

To evaluate this pathway, the exposure point concentrations in the source area, point of compliance, or point of exposure locations should be calculated based on the measured concentrations as discussed below. In all cases, measurements taken more frequently than monthly will not be accepted to meet the specified number of measurements.

- For wells with, major fluctuations and no clear trend, the exposure point concentration is estimated as the 95% UCL of the most recent two years or most recent eight measurements, whichever represents the longer time duration. If this amount of data is not available the maximum concentration should be used as the exposure point concentration if it can be demonstrated that adequate travel time has elapsed since the release to allow the plume to reach the compliance well.
- For compliance wells with stable, clearly decreasing, or clearly increasing trends, the exposure point concentration is estimated as the 95% UCL of the most recent one year of data or most recent four measurements, whichever represents the longer time duration. For wells with an increasing concentration trend, continued monitoring will be required until the trend stabilizes. Quarterly data for at least one year is recommended. The data should be pooled for source area characterization where multiple wells are available. Wells clearly not part of the source area of contamination should not be included in the calculations.

A9.4.4.2 Exposure point ground water concentration for protection of indoor inhalation

Ground water concentrations protective of indoor inhalation are commonly estimated using the Johnson and Ettinger model (Johnson and Ettinger, 1991). This model assumes no lateral or transverse spreading or attenuation of the vapors as they migrate upward from the water table through the capillary fringe, the unsaturated zone, and into the enclosed space. Thus, the exposure point concentrations for this pathway should be based on the ground water concentration measured within and adjacent to the footprint of the building. Also refer to Section A9.4.2.2 for discussion related to the future land use footprints and their relationship to the impacted area.

For the indoor inhalation of vapor emissions from ground water, multiple exposure point concentrations may be required if the plume has migrated below several current or potential future buildings. For example, if a plume has migrated or is likely to migrate below two different buildings (for example on-site and off-site building), separate on-site and off-site exposure point concentrations should be estimated.

If the plume has migrated below several buildings with similar receptors (residential or commercial) it may be sufficient to evaluate this pathway only for the building below which the concentrations are the highest and/or the depth to ground water is the lowest. If this building is protective of indoor inhalation exposures, it may not be necessary to evaluate other buildings.

The plume may not be in the proximity of current structures. If assumed future land use includes the possibility of building structures in the vicinity of the plume a similar calculation of exposure point concentrations and risk should be made, using appropriate assumptions about the location and type of future structures.

While the target ground water concentrations are based on the assumption of no lateral or transverse spreading of the vapors as they diffuse upwards to the building, site characteristics such as site lithology and preferential pathways may result in lateral migration towards a structure. For this reason the exposure point concentrations should be conservatively based on data gathered adjacent to the structure. After identifying the locations of the building footprints and the appropriate ground water monitoring data within and adjacent to each footprint, the 95% UCL or area-weighted average concentration within each footprint may be estimated, as discussed in Section A9.5.

A9.4.5. Soil Vapor

Soil vapor is used exclusively to evaluate the risk posed via the vapor intrusion pathway. Many of the same considerations discussed for the development of exposure point concentrations using soil data in section A9.4.2.2 also apply to soil vapor data. One important difference however is that, similar to groundwater concentrations, typically the number of soil vapor sample locations is fewer than with soil data and the use of statistical methods is precluded. In most cases it is preferable to use the maximum concentrations measured within the defined EU. Where multi-depth sampling of soil

vapor has demonstrated attenuation of concentrations and the presence of a sufficient thickness of oxygenated soil conditions the use of lower concentrations may be acceptable. Sufficient sample numbers are more often available where source areas or the buildings under consideration are large. In these situations the use of area-weighted averaging or other statistical methods may be appropriate.

A9.5 ESTIMATING AREA-WEIGHTED EXPOSURE POINT CONCENTRATIONS

Area-weighted exposure point concentration can be estimated using the Thiessen Polygon Method (Fetters, 1993 and Linsley, 1975). If the available data are located on a uniform grid, the area-weighted average would be the same as the arithmetic average. If the dimensions of the source and the receptor's EU are relatively small (several tens of feet across), and very few (1 to 6) soil samples are available within the soil source, the arithmetic average concentration may be used as an approximation of the area-weighted average concentration.

A.9.5.1 Step 1: Identify the Exposure Unit

The first and most critical step is to identify the size and location of the EU over which the area-weighted exposure point concentration has to be estimated. The location and size of this EU will often vary depending on the pathway being evaluated. Specific guidance on the location of the receptor's area of exposure has been discussed in Sections A9.3 and A9.4. Area weighted concentrations can only be estimated if multiple samples have been collected within the unit. If several samples are available just outside the EU, it may be reasonable to extend the size of the unit to include this data. If the values of these samples are non-detect they should not be included. This step is technically justified since at most sites the location of the unit is at best approximate.

As part of this step the various EUs for which area-weighted concentration is desired should be drawn on a site map and the location of data points (soil borings, monitoring wells, etc.) should be clearly located on the map.

If the borings or monitoring wells within the EU are located in a regular grid, the calculation of an area-weighted average is unnecessary and the user should proceed with a exposure point concentration calculation using a different method, such as the 95% UCL.

A.9.5.2 Step 2: Subdivide the Exposure Unit

The EU, identified in Step 1, is discretized into polygonal elements by connecting the sampling points within each EU identified in Step 1 and drawing perpendicular bisectors to these lines to form polygons. The area of each Thiessen polygon is then estimated.

A.9.5.3 Step 3: Estimate Exposure point Concentration for Each Thiessen Polygon

The concentration measured at the sampling location within each polygon is considered representative of the area of each polygon. As discussed in Section A9.3, if multiple data are available from a location (either multiple depths or dates), compute the arithmetic average concentration of each COC measured at that location. The arithmetic concentration is then considered representative of the polygon.

A.9.5.4 Step 4: Estimate Area-Weighted Average Concentration for the Exposure Unit

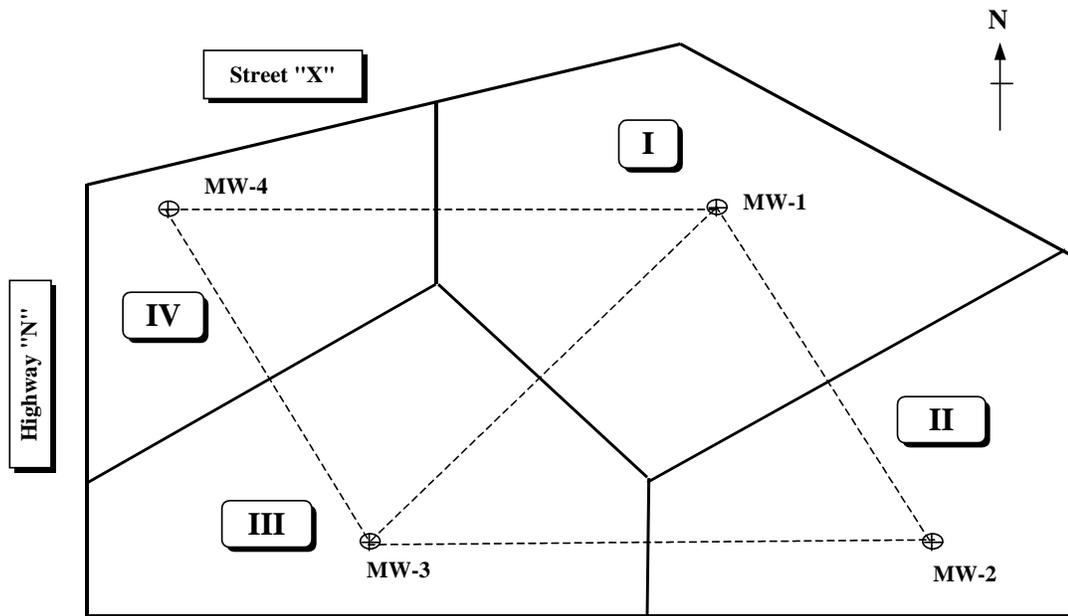
The area-weighted average concentration for the EU is estimated using:

$$C_{area} = \frac{\sum_{i=1}^{i=n} (A_i * C_{avg,i})}{A_{Total}} \quad (A9-1)$$

where,

- C_{area} = area-weighted average concentration over the EU [mg/kg]
- A_i = area of each Thiessen polygon [m²]
- A_{Total} = total area of the polygons (i.e., area of the EU) [m²]
- $C_{avg,i}$ = mean of soil or ground water concentrations measured within the polygonal element i [mg/kg]

An example application of the Thiessen polygon method is schematically shown in Figure A9-2.



Polygonal Element	Mean Soil Concentration $C_{avg,i}$ mg/kg	Area of the Element A_i m^2	$A_i * C_{avg,i}$ $m^2 - mg/kg$	Area Weighted Average Concentration mg/kg
I	2	604	1208	
II	1.8	398	716.4	
III	1.2	578	693.6	
IV	1	234	234	
TOTAL		1814	2852	
Area Weighted Average Concentration = $C_{area} = \frac{\sum_{i=1}^{i=n} (A_i * C_{avg,i})}{A_{Total}}$				1.57

Figure A.9-2. Thiessen Polygon Method

A9.6 ESTIMATING THE UPPER CONFIDENCE INTERVAL OF THE MEAN

It is usually assumed when calculating exposure point concentrations that the receptor is an individual who randomly moves over the EU. Although the receptor may not actually exhibit a truly random pattern, the assumption of equal time spent in different parts of the area is reasonable. In these cases the most accurate exposure point concentration would be the true population mean concentration. Unfortunately, the true population mean concentration is impossible to obtain. The true population mean is a unique value that can be calculated only if the entire population has been sampled (i.e., the entire contaminated media analyzed). Since the entire population is almost never sampled, the true mean is never known. Thus, at best, only an estimate of the true population mean concentration is possible.

To account for the uncertainty associated with the estimated mean concentration, a confidence interval about the true but unknown mean is often constructed. The interval estimate includes a range and an associated degree of confidence that the true unknown mean lies within this range. Thus a two-sided 95% confidence interval about the true mean represents a range within which 95% of the estimates of the true mean are likely to exist. This also implies that there is a 5% chance that the true but unknown mean would lie outside these limits. If this interval is symmetrical then there is a 2.5% chance that the true mean exceeds the upper limit and a 2.5% chance that the true mean is less than the lower limit. Confidence intervals can be estimated for a variety of different confidence levels.

In risk assessment applications, instead of calculating the two-sided confidence interval, a one-sided confidence interval is most often estimated. The upper limit for a one-sided 95% confidence interval of the mean is defined as a value that, when calculated repeatedly for randomly drawn subsets of site data, equals or exceeds the true mean 95% of the time. Alternatively the true mean exceeds the UCL only 5% of the time.

Several issues commonly arise with environmental datasets that complicate the development of the confidence limit and should be evaluated through the use of an exploratory analysis prior to performing the calculation. These issues include:

- Determination of the distribution of the data chosen to represent the EU (normal, lognormal, or nonparametric; i.e. not conforming to a specific distribution. This determination includes decisions as to what analysis and statistical tests to perform, how to interpret the test results, and how to treat the data once a determination is made.
- How to handle censored data and/or skewed data (typically non-detect value).

Depending on the nature of the underlying distribution of the data (or lack thereof) the one-sided, 95% UCL can be calculated using a number of methodologies. The details regarding these methodologies are beyond the scope of this guidance. A number of

references are available which can assist in explaining how to conduct the appropriate analysis. These include EPA, 2002b; EPA, 2006b; EPA, 2010a. The tools to perform the exploratory analysis as well as the UCL calculations themselves are available in the ProUCL (version 4.0) software developed by EPA. ProUCL also assists in the evaluation and analysis of data sets containing left-censored (non-detect) results as well as non-parametric data analysis. This software is available for download at:

http://www.epa.gov/esd/tsc/TSC_form.htm

A9.7 RECOMMENDATIONS

- For most pathways, 95% UCL techniques are recommended for development of exposure point concentration estimates of average concentrations. For cases where the number of samples is low (<4) use of the maximum concentration may be most appropriate. The use of the maximum may also be appropriate when the calculated 95% UCL exceeds the maximum concentration measured at the site and the collected data are considered representative of site and exposure unit conditions.
- The use of area-weighted average methods is not recommended for most pathways. Their use in developing exposure point concentrations for the surficial soil pathway may be justified. The inclusion of methods that evaluate and incorporate spatial uncertainty into the area-weighted average calculation increases the validity of the estimate derived (Burmester and Thompson, 1997).

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APPENDIX A-10: SAMPLE TABLE OF CONTENTS FOR A RISK EVALUATION REPORT

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APPENDIX A-12: QUALITY ASSURANCE PROJECT PLAN TEMPLATE



1. Title and Approval Page

_____ (Project Name)	
_____ (Responsible Agency)	
_____ (Date)	
<i>Project Manager Signature</i>	
	Name/Date
<i>Project QA Officer Signature</i>	
	Name/Date
<i>Program Manager Signature</i>	
	Name/Date
<i>Quality Director Signature</i>	
	Name/Date

2. Table of Contents

List sections with page numbers, figures, tables, references, and appendices (attach pages).

3. Distribution List

Names and telephone numbers of those receiving copies of this QAPP. Attach additional page, if necessary.

- i.
 - ii. _____
 - iii. _____
 - iv. _____
 - v. _____
 - vi. _____
 - vii. _____
 - viii. _____
-

ix.

x.

4. Project/Task Organization

List key project personnel and their corresponding responsibilities.

Name	Project Title/Responsibility
	Advisory Panel (contact)
	Project Manager
	QA Officer
	Field/Sampling Leader
	Laboratory Manager/Leader

5. Problem Definition/Background

A. Problem Statement

B. Intended Usage of Data

6. Project/Task Description

A. General Overview of Project

B. Project Timetable

D. Data Completeness

Parameter	No. Valid Samples Anticipated	No. Valid Samples Collected & Analyzed	Percent Complete

8. Training Requirements and Certification

A. Training Logistical Arrangements

Type of Volunteer Training	Frequency of Training/Certification

B. Description of Training and Trainer Qualifications

9. Documentation and Records

10. Sampling Process Design

A. Rationale for Selection of Sampling Sites

B. Sample Design Logistics

	Type of Sample/ Parameter	Number of Samples	Sampling Frequency	Sampling Period
Biological				
Physical				
Chemical				

11. Sampling Method Requirements

Parameter	Sampling Equipment	Sampling Method

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12. Sample Handling and Custody Procedures

13. Analytical Methods Requirements

14. Quality Control Requirements

A. Field QC Checks

B. Laboratory QC Checks

C. Data Analysis QC Checks

15. Instrument/Equipment Testing, Inspection, and Maintenance Requirements

Equipment Type	Inspection Frequency	Type of Inspection

16. Instrument Calibration and Frequency

Equipment Type	Calibration Frequency	Standard or Calibration Instrument Used

17. Inspection/Acceptance Requirements

18. Data Acquisition Requirements

19. Data Management

20. Assessment and Response Actions

21. Reports

22. Data Review, Validation, and Verification

23. Validation and Verification Methods

24. Reconciliation with DQO's
