VAPOR INTRUSION



State Bar of Michigan

Environmental Law

Section

September 18, 2014



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Vapor Intrusion!





Objectives

- Introduce VI concepts and issues
- Sampling Media
- Issues that affect VI
- Helpful hints
- Installing a soil gas point



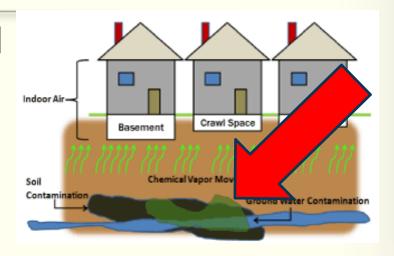
Terms

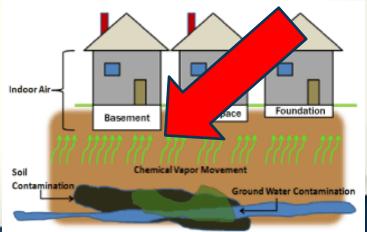
Concentrations in the soil, soil gas, and groundwater that generate vapors =

Vapor Source

Migration of vapors from contaminated groundwater or soil *into* an overlying building =

Vapor Intrusion





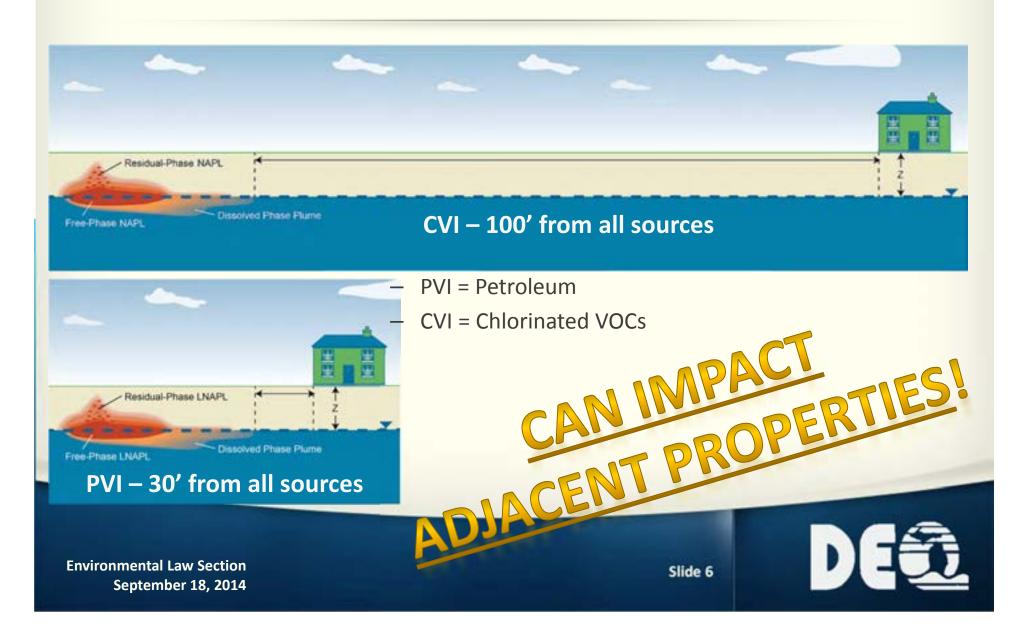


 stack effects wind effects utility line vapor intrusion through cracks in foundation slab vapor intrusion through floor-wall cracks water table soil vapor migration groundwater plume of VOCs soil contaminated with VOCs **Environmental** Septem

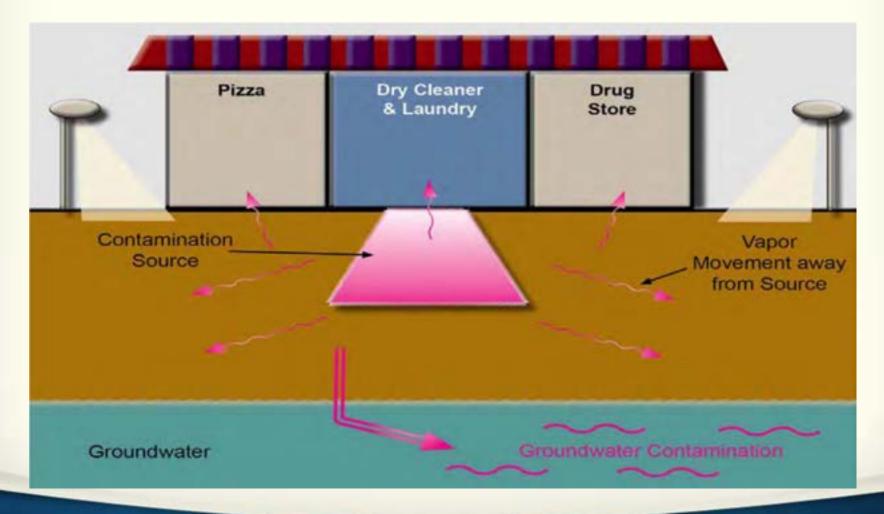
Figure 1. Migration of Soil Vapors to Indoor Air



Screening Distances



Typical VI Scenarios





How do we investigate VI?

Advantages and Disadvantages Associated with Sampling Media

| Media | Pros | Cons | | | |
|---|--|--|--|--|--|
| Groundwater sampling | Commonly collected during the course of an investigation | when sources are present in the vadose zone | | | |
| | Helps assess potential downgradient impacts of VI | | | | |
| | Can be performed at properties having no existing buildings | | | | |
| Soil sampling | Commonly collected during the course of an investigation | VOC loss on sampling may be significant, which can mean vapor concentrations may be | | | |
| | Can be performed at properties having no existing buildings | | | | |
| | Detections may indicate VI issues | May not accuratly represent vapor concentration when sources are present adjacent to collected sample | | | |
| Soil gas sampling | Can provide an estimate of vapor concentrations near the source or near buildings | Lateral and vertical spatial variability | | | |
| | Collected near buildings; can be performed without entering the structure | Results may not be representative of vapor concentrations under a building | | | |
| | Can be performed at properties having no existing buildings | May not reflect how soil gas concentrations will change if a building is subsequently built on a currently vacant property | | | |
| Sub-slab sampling of vapors beneath buildings | Can provide measure of vapor concentration directly below indoor air space | Method is intrusive | | | |
| | Closest subsurface sample to receptors | Cannot be performed at properties having no existing buildings | | | |
| Indoor air sampling | | Indoor contaminants and lifestyle sources may bias the data | | | |
| | Can provide direct measurement of Indoor air | Method is intrusive | | | |
| | concentrations | Cannot be performed at properties having no existing buildings | | | |
| | | Varies significantly over time | | | |



Environmental Law

Soil Samples and VI



- "Generally" not a good predictor
- Where the sample is collected matters





Soil (cont)

• PROs

- Commonly collected during the course of an investigation
- Sampling methodology is well accepted





• CONs

- May not accurately represent vapor concentrations when sources are present adjacent to collected sample
- VOC loss on sampling may be significant



Groundwater

• PROs

- Commonly collected during the course of an investigation
- Can be performed at properties having no existing buildings





• CONs

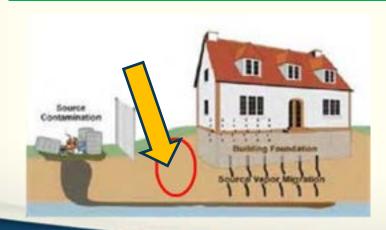
- May not accurately represent vapor concentrations when sources are present in the vadose zone
- Modeled indoor air concentration



Soil Gas

PROs

- Can provide an estimate of vapor concentrations near the source or near buildings
- Can be performed without entering the structure





CONs

- Results may not be representative of vapor concentrations under a building
- May not reflect how soil
 gas concentrations will
 change if a building is
 subsequently built on a
 currently vacant property



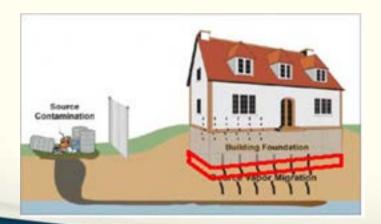
Subslab Soil Gas

• PROs

- Can provide measure of vapor concentration directly below indoor air space
- Closest subsurface sample to receptors







CONs

- Method is intrusive
- Cannot be performed at properties having no existing buildings



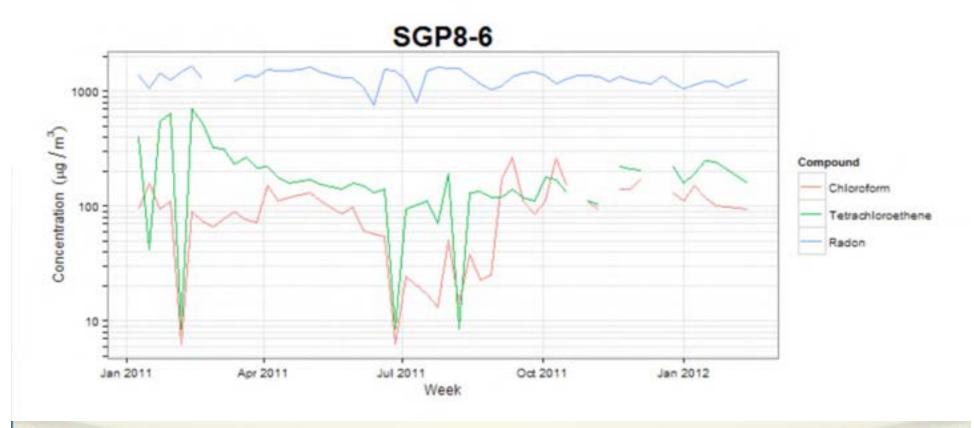
Why not indoor air?

- Highly variable
 - Seasonal
- TWA vs. grab
- Expensive
 - Relocation
 - Prep/post
- Expect indoor air concentrations



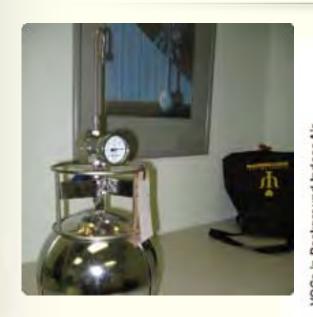


Variability of Indoor Air





EPA 2011 Indoor Air Study



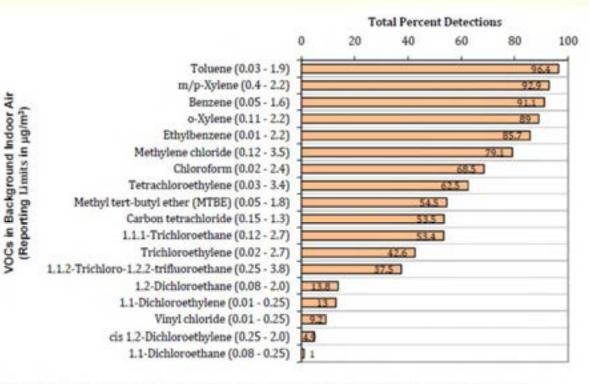


Figure 4. Total percent detections of common VOCs in background indoor air compiled from 15 studies conducted between 1990 and 2005. Range of reporting limits is shown in parentheses.



Some are easy to figure out. . .



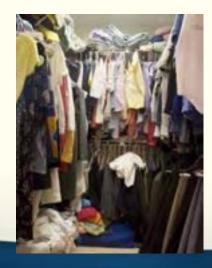
PCE > 95% by weight Can also include:

- TCE
- Toluene
- Acetone
- More...



Can include:

- TCE
- Toluene
- Acetone
- More...



PCE



Some aren't





- Naphthalene (31 μg/m³)
- 1,4 Dioxane (2,100 μg/m³)
- Toluene (120 μg/m³)
- Ethanol (600,000 μg/m³)
- And a bunch of others . . .



Contains:

- TCE
- PCE (up to 95% by weight)



Contains:

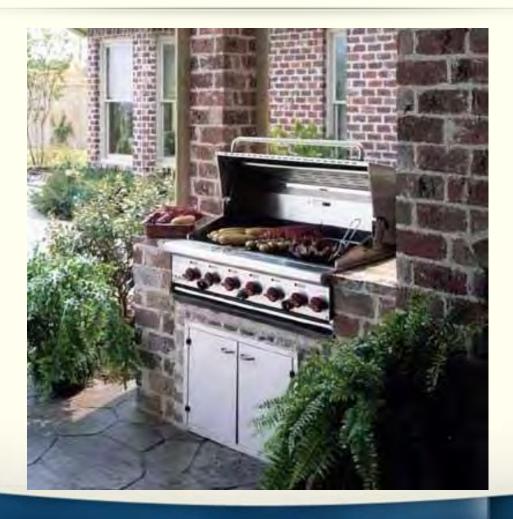
- Ethylbenzene (3,400 μg/m³)
- Toluene (660 μg/m³)
- TPH (390,000 μg/m³)
- And more . . .



1,2 DCA



Grilling with flavor. . .





Why not OSHA values?

- Not designed for the "non-worker"
- Requires awareness training, PPE, and/or medical monitoring



- "Simply complying with OSHA's antiquated PELs will not guarantee that workers will be safe." - David Michaels, Assistant Secretary of Labor for Occupational Safety and Health
- OSHA may be acceptable
- NOT RESIDENTIAL



Indoor Air

PROs

 Can provide direct measurement of indoor air concentrations



CONs

- Method is intrusive
- Indoor contaminants and lifestyle sources may bias the data
- Varies significantly over time
- Cannot be performed at properties having no existing buildings



What does the data mean?

 $attenuation factor = \frac{Indoor Air Concentration}{Source Concentration}$

attenuation factor = α

 α X (Source Concentration) > Indoor Air Concentration





Johnson and Ettinger (1991)

$$\alpha = \left(\frac{C_{\text{indoor}}/C_{\text{source}}}{\left[\frac{D_T^{\text{eff}} A_B}{Q_{\text{building}} L_T} x \exp\left(\frac{Q_{\text{soil}} L_{\text{crack}}}{D^{\text{crack}} A_{\text{crack}}}\right)\right]}$$

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

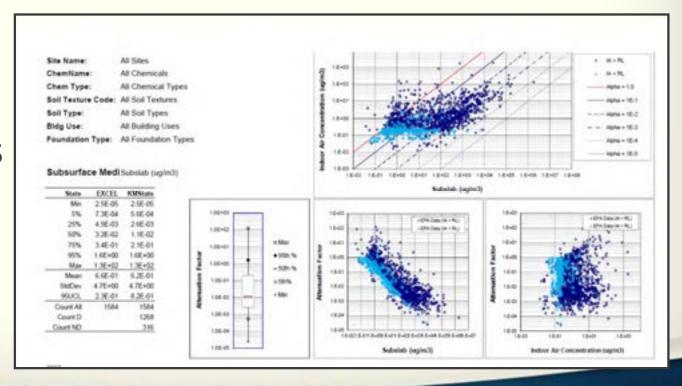
*Johnson, P. C, and R. A. Ettinger. 1991. Heuristic model for predicting the intrusion rate of contaminant vapors in buildings. Environ. Sci. Technol. 25: 1445-1452



Empirical Evidence

http://www.epa.gov/oswer/vaporintrusion/vi data.html

Over 1,600 "paired" data points





Interpreting the Results

- Variability (spatial and temporal)
 - Construction
 - Size of structure
 - Slab-on-grade vs crawlspace
 - Heating and cooling systems
 - Precipitation and weather
 - Measurement method

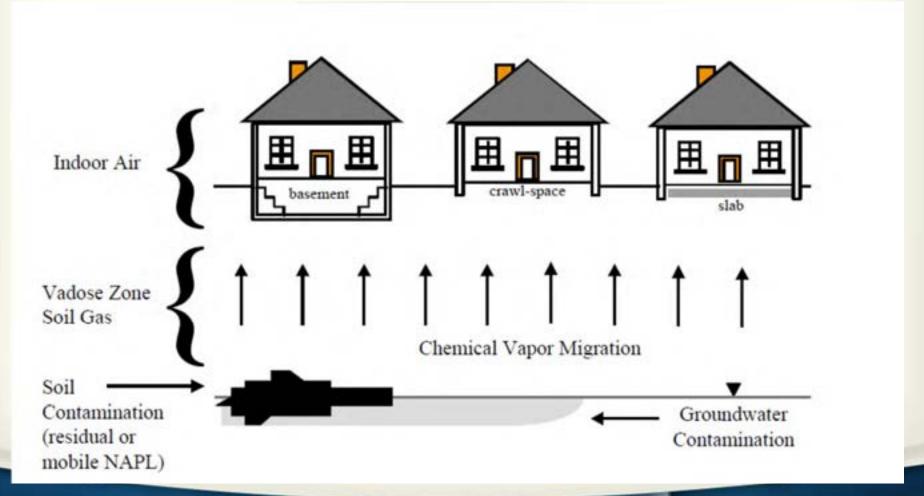


Interpreting the Results (cont)

- Distance to source
 - Assumes knowledge of the extent of source of vapors
- Depth to water (if a source)
- Soil characteristics
 - bulk density, total porosity, water filled porosity, soil water content, grain size
- System temperature (north vs south)
- Air exchange rate



Building Construction





Building Size and Source Location



Measured Soil Gas Profile for TCE – Phase 2

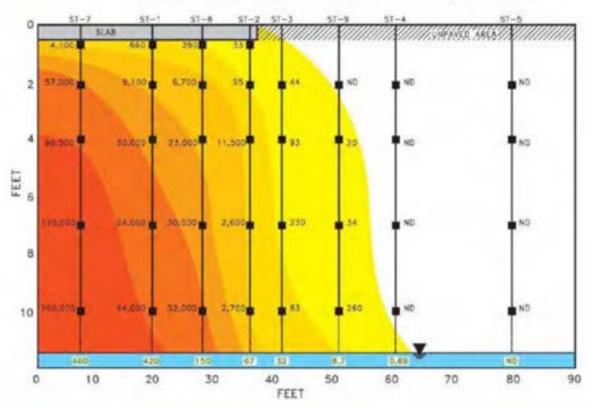
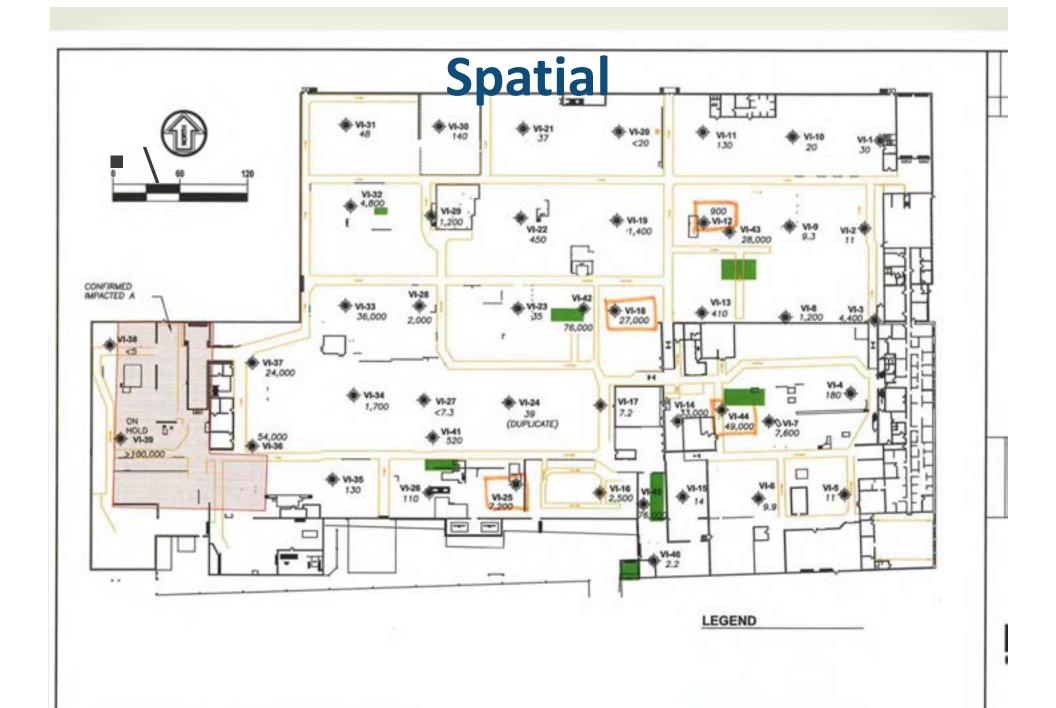


Figure 2-2. Soil gas and groundwater concentrations below a slab (Schumacher et al., 2010).



Soil Types

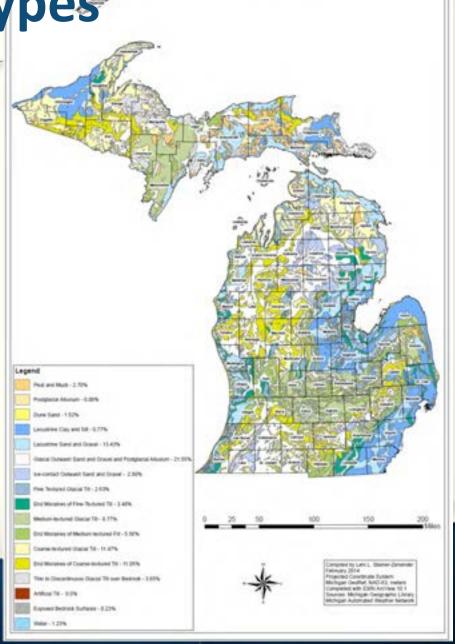
Quateriary Geology of Michigan

• Sand – 39.4%

• Loam – 36.7%

• Clay – 15.9%

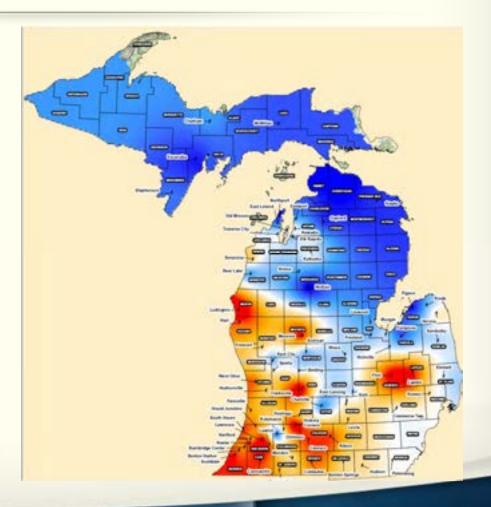
• Other – 8.0%



Environmental Law Section September 18, 2014

Temperature

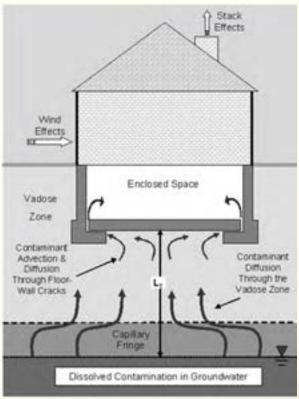
- Assign temp based on identified county average
 - Data based on 72Stations
 - Daily average
 - Up to 15 years of data





Multiple Lines of Evidence

- Soil gas spatial concentrations
- Groundwater spatial data
- Building construction
- Sub-slab soil gas data
- Indoor air data
- Soil stratigraphy
- Temporal patterns





Investigate vs. Presumptively Mitigate

Extra time and cost required for investigation

VS.

Cost to presumptively mitigate the site (allowed for under Part 201)





Response Actions

- Source Area Remediation
- Institutional Controls
- Building Controls





APPENDIX 1 Recommended Parameters for Common Petroleum Products

| Parameters | Leaded Gasoline ¹ | Unleaded Gasoline ² | Petro. Solv ³ | Light Distillate Oils ⁴ | Residual Oils ⁵ | Used Motor Oils ⁶ | Waste Oils ⁷ | Unknown |
|--|---------------------------------|-----------------------------------|-----------------------------|--|-------------------------------|------------------------------------|----------------------------|---------|
| BTEX | X | Х | Х | Х | | Х | Х | Х |
| Trimethylbenzene Isomers (TMB) ⁸ | × | х | х | х | х | х | х | Х |
| MTBE | | × | | | | | | Х |
| 1,2-Dibromoethane ¹ (ethylene dibromide) | × | | | | | × | × | Х |
| 1,2-Dichloroethane ¹ | × | | | | | Х | x | X |
| PNAs ⁹ | | | х | х | x | Х | х | х |
| Naphthalene/ 2-methylnaphthalene | x | × | | | | | | х |
| Cadmium ¹⁰ | | | | | | Х | × | × |
| Chromium ¹⁰ | | | | | | Х | х | х |
| Lead ¹⁰ | х | | | | | Х | x | х |
| Volatile Halocarbons ¹¹ | | | | | | х | х | × |
| PCBs | | | | | | | × | × |

PNAs with HLC $> 10^{-6}$

- Naphthalene
- 2-methylnaphthalene
- Acenaphthene
- Acenaphthylene
- Fluorene

- Anthracene
- Phenanthrene
- Ethylene Dibromide (1,2-Dibromoethane)
- Fluoranthene
- Pyrene

*TO-15 can't analyze everything . . .



Common Soil Gas Methods

- TO-15
- TO-17
- TO-13A
 - (via Low-Flow)
- NIOSH
- EPA



NOTE:

JUST LIKE SOIL AND GROUNDWATER, MORE THAN ONE METHOD MAY BE REQUIRED!



Typical Soil Gas Concentrations

- SG concentrations can create headaches!
 - Typical Soil Gas Concentrations
 - Benzene near gasoline spill: >100,000 μg/m³
 - TPH vapor: >1,000,000 μg/m³
 - TCE near a degreaser: >75,000 μg/m³
 - PCE under dry cleaner: >100,000 μg/m³



Something else to think about. . .

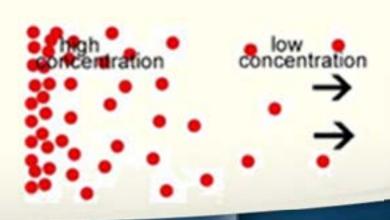
- How Fast Do Vapors Move?
 - Distance = $(2 * D_e * t)^{1/2}$

where:

D_e is the effective diffusivity.

t is time







How Fast Do Vapors Move (cont)?

- For many vapors, the gaseous diffusion coefficient is approximately 0.1 cm²/s
- Soil porosity varies depending on the type of soil
 - Several equations are available to calculate the effect of air-filled and total porosity on the diffusivity
 - Conservative approximation is that the porosity reduces the gaseous diffusivity by a factor of 10
 - $-D_e$ can be approximated as 0.01 cm²/s



How Fast Do Vapors Move (cont)?

Distance

~1 inch | day = $(2 * 0.01 \text{ cm}^2/\text{s} * 31,536,000 \text{ s})^{1/2}$

 \sim 800 cm = \sim 25 feet per year

Into and through the groundwater in a year: 3 inches

*Assumes liquid diffusion

*Assumes liquid diffusion, not gaseous diffusion, coefficient for compounds is approximately 0.00001 cm²/s



Consider when sampling:

- Site geology
- Sample volume
- Sample collection vacuum
- Sample probe purging
- Soil gas equilibration
- Sampling interval
- Sampling method
- Weather?





Quality of the Data

GOAL is to collect reliable data!

- How much to collect?
 - number of samples vs volume
 - Greater the volume, greater the uncertainty
 - More samples, better characterization
- Where will they be collected?
 - Closer to surface, harder to collect
 - 5' bgs generally considered stable (building?)



Quality of the Data (cont)

- When to collect
 - Weather
 - Seasonal effects
 - Extreme temperature variations
 - Heating/cooling of structure
 - Heavy periods of rain
- New vs old vs modified
- Will it change the concentrations?



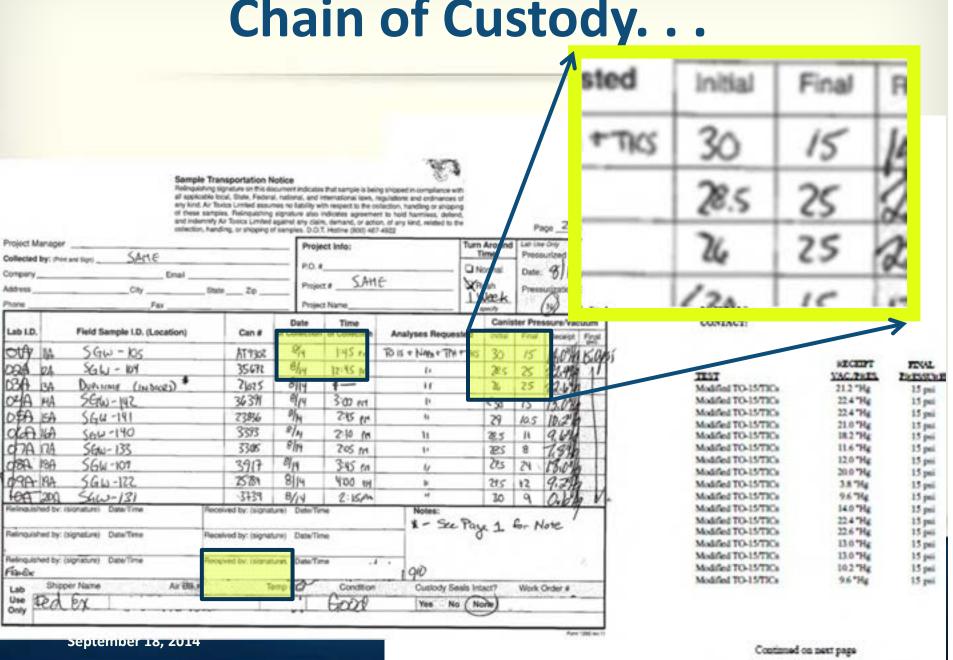
Reliable Data Requires

- Just like soil and groundwater
 - Good sampling techniques
 - Good analytical methods
 - Good CSM (where is the source)
 - Understanding what the data means
- Experience with vapor sampling
 - Have they done this before?
 - Quality/experience of field staff? Sr or Jr?





Chain of Custody. . .



Breakthrough. . . NOT a lab issue, a sampling issue

| 0-15 (70-15) | | | A | Nguot 10: 515 | 10.461 | Matrix: Air | Analyst | | |
|-----------------------------------|----------|--------|-----------------|---------------|-----------|-------------|---------------|---------------|--|
| (Symulater) | Result 0 | ONS | Reporting Limit | DIMIN | Prep Date | Prep Batch | Analysis Date | Analysis Balo | |
| L'Acetone (NN) | 398 | pby | - 51 | .10 | 08/27/12 | VA12H27B | 06/25/12 | VAXDH278 | |
| 2 Berzere (VV) | €.0 | ydqv . | 2.8 | 10 | 06/27/12 | VA12H21B | 08/25/12 | VAIZHOTE | |
| 3. Berzyl Chloride (NN) | 0 | ppbv | 67 | 340 | 08/31/12 | VATZHOTA | 06/31/12 | VAX2H31A | |
| 4 Bromodichioromethane (NN) | U | ppby | 2.8 | 10 | 08/27/12 | VA12H278 | 08/28/12 | VAIZHZTE | |
| 5 Bromotom (NN) | U | ppby | 61 | 240 | 05/31/12 | VATZHETA | 06/31/12 | VATZHZTA | |
| 6. Bromomethane (NN) | U | ppby | 2.6 | 10 | 08/27/12 | VA12H278 | 05/25/12 | WATZHQ78 | |
| 7.1,3-Butatiene (NN) | Ų | pptv | .55 | 10 | 06/27/12 | VAISH278 | 05/25/12 | VAIGHOTE | |
| 6.2-Butanone (NN) | U | ppby | 12 | 10 | 080712 | VA12H278 | 08/25/12 | VAIGHER | |
| S Carbon Deutlion (NN) | 18 | ppbv | 13 | 10 | 08/27/12 | VAI2H276 | 08/25/12 | VAXDHZTE | |
| 10 Carbon Tetrachionde (NN) | U. | ppby | 2.7 | 10 | 08/27/12 | VA12H276 | 06/25/12 | VAIDHOTE | |
| 11. Chomberzene (NN) | U | ppby | 67 | 240 | 083112 | VAIZHUM | 08/31/12 | VAIDHOU | |
| 12 Chloroethane (NN) | U | ppby | 1.3 | 10 | 06/27/12 | VA12H278 | 08/28/12 | WAIGHOTE | |
| The same and | - 22 | CODY | 2.6 | 10 | 08/27/12 | VA12H278 | 08/28/12 | VAIDHOTE | |
| 4 Chortmetiane (NY) | 73 J.L+ | pov | 27 | 10 | 08/27/12 | VA12H27B | 05/25/12 | VAIZHZTE | |
| *** | | eev . | 28 | . 10 | 58/27/12 | VA12H278 | 06/26/12 | VAIGHZTE | |
| 16 Dipromodhipromethane (NN) | υ | pppy | 2.9 | 10 | 08/27/12 | VA12H278 | 06/25/12 | VAIZHOTE | |
| 17. 1.2-Okthorobenzene (NN) | U | ppby | 67 | 240 | 0631112 | VA12H01A | 08/31/12 | VAIZHSIA | |
| Iš. 1.3-Oktroroperzene (NN) | U | ppby | 67 | 240 | 0831/12 | VA12HD1A | 06/31/12 | VAIDHOU | |
| 19 1.4-Olchioroberzene (NN) | U | ppbv | 67 | 240 | 0601/12 | VA12H01A | 08/31/12 | VAIQHOU | |
| 25 Dioniorodifluoromethane (NN) | U | ppby | 2.6 | 10 | 06/07/12 | VA12H278 | 08/28/12 | VAIZHOTE | |
| 21. 1,1-Oktrorpetrane (NV) | U | poby | 2.6 | 10 | 08/27/12 | VA12H276 | 06/25/12 | VAIGHETE | |
| 22 1,2-Oktyproethane (NN) | U | ppby | 2.8 | 10 | 08/27/12 | VA12H278 | 05/25/12 | VAIGHER | |
| 23 1,1-Dichloroethene (NN) | U | 998V | 2.6 | 10 | 06/27/12 | VA12H278 | 08/28/12 | VAIGHOTE | |
| 24 ds-1,2-Dichloroethene (NN) | U | 0004 | 2.8 | 10 | 08/27/12 | VA12H27B | 06/26/12 | VAIZHZTE | |
| 25 trans-1,2-Dictioroethere (NN) | U | ppbv | 2.8 | 10 | 08/27/12 | VA12H276 | 06/25/12 | VAIGHOTE | |
| 26.1.2-Olohoropropane (NN) | U | pppy | 5.5 | 10 | 06/07/12 | VA12H278 | 06/26/12 | VAIZH278 | |
| 27. dti-1,3-Dichloropropene (NN) | U | ppby | 1.5 | 30 | 08/27/12 | VA12H078 | 08/25/12 | VAIGHOTS | |
| 25 trans-1.3-Dichloropropene (NN) | U | poby | 1.2 | 10 | 08/27/12 | VA12H278 | 06/25/12 | VAIZHZTS | |
| 29 1,4-Oloxane (NN) | U | ppbv | 5.5 | 10 | 06/27/12 | VA12H278 | 08/28/12 | VAIGHOTE | |
| 3G Ethyl Apelate (NN) | U | ppby | 28 | 10 | 9897112 | VA12H278 | 08/28/12 | VAIZHZTE | |
| 31 Etryberzene (NN) | u u | ppby | 67 | 240 | 0601/12 | VATZHOTA | 08/31/12 | VAIDHOU | |
| 12 Ethylene Dibromide (NN) | U | ppby | 2.8 | 10 | 08/27/12 | VA12H278 | 06/25/12 | VAIGHOTE | |
| 33.4-Ethyloniene (NV) | U | poby | 130 | 240 | 08/31/12 | VAIZHUIA | 08/31/12 | VAIZHOU | |
| 34 n-Heptane (NN) | U | ppby | 67 | 240 | 08/31/12 | VATZHIJIA | 05/31/12 | VAIZHBIA | |
| 35 riexachiorobutadiene (NV) | U. | pobv | 67 | 240 | 08/31/12 | VAIZHOIA | 06/31/12 | VAIDH31A | |
| 36. n-Hiesane (NN) | U | ppby | 2.8 | 10 | 08/27/12 | VA12H278 | 06/25/12 | VAIDHOTE | |
| ST Sussessons (NAC) | - 6 | opby | 29 | 10 | 0807/12 | VA12H278 | 06/26/12 | VAIDHOTE | |
| iš istoropanoi (Revi) | 150000 E | obv | 3200 | 1100 | 08/31/12 | VA12H01A | 09/01/12 | VAIDHDIA | |
| O Klastina or Charles (1991) | | oby | 13 | 10 | 08/27/12 | VA12H276 | 05/25/12 | VAIDHOTE | |



Environmental Law September 1

TARLE 4 SOIL VAPOR ANALYTICAL RESULTS

| Soil Vapor Monitoring Point | Screened Interval | Sample Date | Explosive Limit (LEL) | Oxygen | Hydrogen Sulfide | Benzene | Toluene | Ethyl- benzene | m & p- Xylene | o-Xylene | Total Xylenes | Total Hydrocarbons as Gas | Carbon Dioxide | Methane | 2-Propanol 1 |
|-----------------------------------|----------------------|------------------|-----------------------------|--|---------------------|---------|---------|-------------------|------------------|----------|------------------|---------------------------------|--------------------------|--------------|--------------|
| ELINATE CO. | feet bgs | W-10.4 (10.0) T | % | 76 | ppm | ppbv | ppbv | ppbv | ppby | ppbv | ppby | ppby | 96 | * | ppby |
| SVMP-1S | 4.96-5.00 | 7/31/2012 | NM | | NM | 2.6 | 7.1 | <1.0 | 3.2 | <1.0 | NA. | 1,580 | <1.7 | 2.4 | |
| SVMP-1S | 4.96-5.00 | 3/06/2013 | 0 | 19.1 | 0.0 | < 0.74 | < 0.74 | < 0.74 | 2.3 | 0.88 | . NA | 365 | NA | <4.0 | |
| SVMP-1S | 4.96-5.00 | 6/05/2013 | 0 | 14.8 | 0.0 | <16.1 | 77.1 | 68.0 | NA. | NA. | 2,950 | 219,000 | NA | <4.7 | N/ |
| SVMP-11 | 8.46-8.50 | 7/31/2012 | NM | NM | NM | <20.5 | <20.5 | 64.3 | 261 | 108 | NA. | 4,050 | 4.2 | <2.2 | *** |
| SVMP-11 | 8.46-8.50 | 3/06/2013 | 1 | 20.0 | 0.0 | < 0.80 | <0.80 | <0.80 | <1.6 | <0.80 | NA | 1,040 | NA. | <4.4 | 117 |
| SVMP-11 | 8.46-8.50 | 6/05/2013 | 0 | 17.2 | 0.0 | <64.4 | <64.4 | <64.4 | NA. | NA. | 260 | 10,300 | NA. | <7.0 | |
| SVMP-1D | 11.96-12.00 | 7/31/2012 | 0 | 19.2 | 0.0 | 42.4 | 109 | <42.4 | 531 | 60.5 | NA | 82,000 | 45.7 | | |
| SVMP-1D | 11.96-12.00 | 3/06/2013 | 0 | 5.0 | 0.0 | <1,330 | <1,330 | <1.330 | 9.560 | <1,330 | NA NA | The second second second | 10.2 | 323 | <42.4 |
| SVMP-1D | 11.96-12.00 | 6/05/2013 | 0 | - | 0.0 | <15.5 | <15.5 | <15.5 | NA. | NA NA | 869 | 580,000 108,000 | NA NA | <5.8 <7.0 | <1,330 N/ |
| SVMP-2S | 4.96-5.00 | 7/31/2012 | 0 | 19.3 | 0.0 | 1.5 | <1.0 | 3.7 | 4.8 | <1.0 | AVA. | 4 252 | | | |
| SVMP-2S | 4.96-5.00 | 3/06/2013 | 0 | the second secon | 0.0 | <0.80 | <.80 | <.80 | <1.6 | <0.80 | NA NA | | 4.3 | <2.0 | |
| SVMP-2S | 4.96-5.00 | 6/05/2013 | 0 | | 0.0 | 1.0 | 11.0 | 3.8 | NA. | NA. | NA 29.2 | 358 5,230 | NA NA | 7.3 | 299.0 N/ |
| SVMP-21 | 0.40 0.50 | ******* | | | | | | | | | | 5,450 | 1401 | -9.0 | THE |
| SVMP-21 | 8.46-8.50 | 7/31/2012 | 0 | | 0.0 | <2.4 | <2.4 | <2.4 | <4.8 | <2.4 | NA. | 1,510 | 7.9 | <2.1 | 8.7 |
| SVMP-21 | 8.46-8.50 | 3/06/2013 | 0 | | 0.0 | <83.1 | <83.1 | <83.1 | <166 | <83.1 | NA | 9,290 | NA. | <5.7 | <83.1 |
| SVMP-21 | 8.46-8.50 | 6/05/2013 | 0 | 19.3 | 0.0 | 4.3 | 38.9 | 7.7 | NA. | NA. | 42.2 | 2,900 | NA | <7.0 | N/ |
| SVMP-2D | 11.96-12.00 | 7/31/2012 | 0 | 18.0 | 0.0 | <2,590 | <2,590 | 2.720 | 40.900 | <2.590 | NA. | 1.630,000 | 11.0 | 202 | <2.590 |
| SVMP-2D | 11.96-12.00 | 3/06/2013 | 0 | 10.2 | 0.0 | 11,200 | 7,070 | 24.800 | 787.000 | 18,000 | NA. | 15.900,000 | NA. | <3.6 | <665 |
| SVMP-2D | 11.96-12.00 | 6/05/2013 | 0 | 18.4 | 0.0 | 6,830 | <1,030 | 6,990 | NA | NA. | 276,000 | 20,200,000 | NA | <6.8 | N/ |
| SMVP-3S | 4.96-5.00 | 7/31/2012 | 0 | 19.5 | 0.0 | <1.0 | 4.2 | <1.0 | <2.0 | <1.0 | NA. | 814 | 2.8 | e3.0 | - 455 |
| SMVP-3S | 4.96-5.00 | 3/06/2013 | 0 | - Contraction of the Contraction | 0.0 | <0.78 | <0.78 | <0.78 | <1.6 | <0.78 | NA. | 81.9 | The second second second | <2.0 | |
| SMVP-3S | 4.96-5.00 | 6/05/2013 | . 0 | 20.9 | 0.0 | 1.9 | 1.3 | 6.2 | NA. | NA. | 34.8 | 4,500 | NA NA | <4.2 | 8.5 NA |

Questions that should be asked

- What level of uncertainty is acceptable?
 - Owner
 - Consultant
 - Financial institution/Other?
- Who is doing the sampling?
- Does my site conditions currently match the future?
 - If not what can be done?



Questions that should be asked

- What are the specific chemicals of concern need to be identified?
 - What methods are necessary and available?
 - Is there more than one method?
 - Is it an air method?
 - Is there a standard available?
 - Pros/Cons
 - What analytical method reporting limits are required?



Questions that should be asked

- Am I going to sample more than once?
 - How will that impact the data?
- What, where and when of sampling. . .



Closing

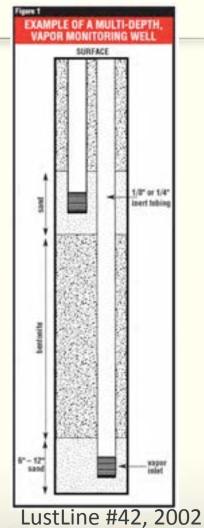




Soil Gas Wells







Also called:

- Soil GasMonitoringPoint
- VaporMonitoringPoint
- Others

Environmental Law Section September 18, 2014 DE

Sub-Slab Monitoring Point



Environmental Law Section September 18, 2014

Slide 54



Questions?

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