

U.S. EPA "State of VI Science" Workshop 2022

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How Vapor Intrusion Data Measured by Communities and Supported by Regulators Can Create "Soil Gas Safe Communities"

Introduction, Background & Overview

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Disclaimer: The views expressed in this presentation are those of the authors and do not necessarily represent the views or policies of the U.S. EPA.







Presentation archived at https://iavi.rti.org/

Welcome | Thank you for joining us

- A long history of participation and collaboration of a large group of experts from the government, academia and consulting
- Today's objective presenting research findings and perspectives on the effort of community involvement in vapor intrusion data collection, interpretation, and decision-making
- "Soil Gas Safe Community (SGSC)"
 - Effective communication/education and support by scientists and regulators
 - Based on past and ongoing research, and observations
- Looking for YOUR feedback and suggestions to successfully implement the SGSC effort at cleanup sites

VAPOR INTRUSION

Data Collection & Interpretation



Assessment & Managment

Science &

Technology



Regulators & Regulated Community



Review & Summary – March 2021

EPA-RCRA perspectives on: Environmental Justice & Citizen Scientists (with ITS)

- VI = Temporal & Spatial variability Many opportunities for inequities
 - Environmental Justice many bldgs. <u>screened out</u> (w/o evidence) [bldg.-specific]
 - Citizen Scientist (with ITS measurements) <u>can participate</u> in risk decisions w/ "
 - Long-term Monitoring (of <u>all</u> buildings 'at risk') can ensure exposure <u>equity</u> (S&T)
 - 'Soil Gas Safe Communities' <u>Celebrates avoidance</u> of all Soil-Gas Intrusion (SGI)
 - Minimizes opportunities for injustices in exposures for populations most likely near CVI sites;
 - i.e., those with <u>disproportionate number of young</u> families with <u>children</u>, who are culturally <u>diverse</u> & <u>economically challenged</u>!

Slide #11 from https://iavi.rti.org/assets/docs/10_Schuver_KC_2021_AEHS.pdf

Today's Sections

Section 1: Overview and Community Involvement

11:00 AM 11:30 AM	Introduction, Background & Overview for 'Soil Gas Safe Communities' (SGSC)	Henry Schuver, Klara Crincoli
11:30 AM 11:45 AM	Redfield as an Example of the Possibility of a Soil Gas Safe Community	Chase Holton
11:45 AM 11:55 AM	Gaffney site as an Example of the Potential for a Soil Gas Safe Community	John Zimmerman, Andrew Weller, Shawn Tisdell
11:55 AM 12:15 PM	Effective Communication: A Tool for Increasing Participation in Communities with Vapor Intrusion Concerns	David Folkes, Seun Akinlotan
12:15 PM 12:45 PM	Panel discussion of 'Soil Gas Safe Communities' concepts and community involvement/Q&A	Lenny Siegel & Kelly Pennell & Alana Lee & Kelly Johnson & John Fitzgerald

Today's Sections

Section 2: Science supporting Soil Gas Safe concepts:

1:00 PM	1:30 PM	Summary of Relevant continuous indicator and tracer (I&T) VI Research: Recently Completed, On-going & Planned	Chris Lutes
1:30 PM	1:50 PM	Methods and Approach for Equivalent Protection Cost Effectiveness analysis of I&T vs. traditional sampling, screening & mitigation approaches	AJ Kondash
1:50 PM	2:30 PM	Results and Interpretation of Sampling Strategy and Equivalent Protection Cost Effectiveness Analyses	Chase Holton & AJ Kondash & Chris Lutes
2:30 PM	3:00 PM	Panel discussion and Q&A section - How might the results of the Equivalent Protection Cost Effectiveness analysis influence Soil Gas Safe Communities (SGSC) decision-making?	Lenny Siegel & Kelly Pennell & Alana Lee & Kelly Johnson & John Fitzgerald

Today's Sections

Section 3: Real world Implementation of Soil Gas Safe Communities

3:15 PM	3:30 PM	Role of area-wide Soil Vapor Extraction (SVE) techniques to achieve equal protectiveness across multiple buildings	Robert Truesdale & Bo Stewart
3:30 PM	3:45 PM	VI Standards and Certifications (Assessment, Mitigation, OM&M, New Construction) by AARST & NRPP	Kyle Hoylman
3:45 PM	4:00 PM	Opportunities for Communities to Maximize Benefits during Implementation	Henry Schuver
4:00 PM	5:00 PM	Planned Research: Overview of SGS Communities Field & Pilot-Community Studies	Brian Schumacher & John Zimmerman & Alan Williams
5:00 PM	5:30 PM	Open Discussion/Q&A for all speakers & panelist – Focus on opinions, recommendations & feedback	

Please submit **comments and questions** through the **chat function**.

Email additional feedback and questions to indoorairvaporintrusion@rti.org (up to June 1, 2022)

Background^{*} & Overview Objective: *Explaining the* (long) *Title*

- Big Picture Today (News)
 - New Opportunity to Test SGSC Concepts & Methods for improving VI Protection
 - Physical Science/(ITS) Methods (Field Trials) (ITS=Indicators, Tracers & Surrogates)
 - Social Science/Application of ITS science methods in Pilot Communities interested in being a SGSC
 - Evolving SGSC concepts & considerations *On-going Discussions*:
 - To *improve* implementation & benefits:
 - Scope of the hazardous/chlorinated-chemical Vapor Intrusion (cVI) problem (new & multiple sources)
 - Defining aerial extent/boundaries of SGSC
 - Helping it Grow/Expand
 - Maintaining protection over time
- Bigger Picture (PM) Soil Gas & Indoor Air (Should Not Mix)
 - Soil gas was never good for IAQ, & it is getting Worse (2x) Best to avoid it

*https://iavi.rti.org/assets/docs/10_Schuver_KC_2021_AEHS.pdf for 12 key slides

Henry Schuver, USEPA-ORCR – Personal (RCRA) perspectives

Background, Origin & Purpose of: *Soil Gas Safe Community (SGSC)* concept



+ 'stepping-out' complications?

- ~2010 observed contrasts between Redfield's¹ & Typical² VI Assessment
- Apparent **Correlations**:
 - Higher % of bldgs¹ & # indoor air samples/bldg¹ = Higher freq. of VI 'found'
 - Lower² " & " " " " = Lower " "
 - & when only a few bldgs. are 'found' to have VI they 'stick out'
 - Can be stigmatized as if different/worse than all others (but probably not)
- Then possible Feedback-cycle
 - Occupants seeing earlier bldgs. being stigmatized, don't want that, & do not allow sampling
 - Fewer bldgs. get sampled and those that did (& happened to 'find' VI) are stigmatized

No good 'Options'

Keep the Community together for More Benefits all-round w/ SGSC

1 – Redfield site Denver Colo. ~96% participating bldgs. allowing avg. ~10 indoor air samples per bldg. (~50% w/controls)

2 – Commonly <25% of bldgs. *targeted* get sampled (< allow), & typically only 2-3 'random' samples per bldg.

Public Health Protection Needs to be Both: Effective & Low Cost

- Still most-commonly used methods *appear to be* the **Opposite**:
 - High Cost Mostly Sampling \$\$* (tot. of access/prep. for indoor air)
 &
 - Ineffective Sparse ('<u>random'/un-guided</u>) indoor Sampling**
 - At identifying VI exposures (of most concern for health)
 - and thus,
 - Not calling for **Controls** of exposure (that **change health**)
 - We're trying to *raise the ratio of benefits* from resources (\$\$) spent on VI
 - We'd like the confidence & benefits of Redfield facility***
 - More/All buildings 'sampled' w/ Indicators & Tracers (I&T) But with *fewer cVOC samples*
 - Overall LOWER sampling \$\$

*Economic Analysis – later today **Sampling Analysis – later today ***Presentations with details coming

RCRA Requested Support [3/31/2021]

The Agency's ORCR, States & Communities

3) Would like ORD to support a <u>large-scale</u> Pilot effort involving:

- <u>Physical scientists</u> to <u>confirm the validity of the science</u> and <u>practicality</u> of implementing the approaches above
- <u>Sociologist</u> to help & ensure community members have
 - Easy Access to participate & collaborate 'on par' with the RP-decision makers & ...
- <u>Economist</u> to compare <u>long-term</u> **Costs** & **Benefits** for:
 - Equally-high levels of **protection** via chemical indoor air <u>sampling **or** controlling[*]</u>SGI; incl.:
 - Long-term on-going protection of SGI/VI continuously documented via Soil Gas Tracer conc. [**]
 - EPA creating a 'Soil Gas Safe Community' designation (similar to Energy Star) to celebrate
 - And minimize Stigma of individual building results

[*See Economic/benefits modeling analysis results at 1:30-2:30 (ET) Very interesting] [**Should be tested in soon]

- This is a real WORKshop about "How"
- Looking for Feedback/Input; on:
- Proposed Specific:
 - Regulatory-focused concepts/frameworks & decision making Panel Discussion
 &
 - Measurements and Field methods (particularly details by **ORD** in afternoon)
 - All feedback/comments/recommendations received by June 1 will be *studied for incorporation* into full-scale Field studies and Community Pilot(s)
 - 1x Opportunity & We want it to be the very Best it Can Be
 - With YOUR experiences, perspectives & comments we might be able to 'Count the Benefits'*

*Comparing disease rates *before and after* controlling soil gas intrusion – 'cases avoided'

- **#1** VI Challenge: VARIABILITY (across Time & Space) So we want:
 - Full *Distributions* of frequent/'<u>continuous</u>' data (across **Time**) that are;
 - Possible from each & every building 'at risk' for VI (i.e., across Space)
- Not currently 'affordable' for cVOC/chemical-specific measurements
- Proposing the use of statistically-associated Indicators & Tracers (I&T)*
 - Differentials (indoor-to-outdoor) *if possible*
 - Indicators of VI Driving forces of *flow*** into bldgs.
 - Temperature
 - Pressure
 - **Tracers** of the *physical movement* of nearby soil gas intruding into your indoor air
 - Radon (Rn) Conc. units, just like we need for cVOCs (incl. indoor mixing & retention)

*Also testing 'Rn-alone' as a Surrogate (w/o cVOCs) for decision making (ITS) **Not addressing diffusion, directly 13

Statistical example: Correlations in the: *Direction* of Conc. Change over Time (+/-)

- Indoor Rn & cVOCs from VI
- When:
 - Indoor Rn conc. goes Up cVOC conc. goes Up
 - Rn " " Down cVOC "
- How confident are we?
 - Time Series Regression Analysis (complex & costly)
 - EPA Indianapolis Duplex (EID) 99%
 - Sun Devil Manor (SDM) 99.9%
 - 10,000 trial runs testing the use of these assoc. to Time a few meaningful cVOC samples later
- *Magnitude* Change in Conc. over Time (#/#) is not 1:1, more complicated
 - High conc. end of distribution
 - Low conc. """"



Occupants *could* monitor intrusion of **soil gas** into their own bldg., with **Rn** meters, ~continuously

- Anyone who has observed a **Rn meter** real-time knows, it changes:
 - Every
 - 15 min.
 - Hour
 - Day
 - Week
 - Month
 - Season
 - Year
 - Decade (Thank you Dr. Steck for measuring your new home for 23 years pre-mitigation!)
 - With such Meters:
- Everyone can 'see' their bldg's soil gas (& if present vapor) intrusion behavior
- Could know if soil gas is intruding when indoor samples are collected

- #2 Challenge: Communities have limited input to decisions on Their risk
- Proposal:
 - **Empower** community members, by providing:*
 - 'All' buildings with 'continuous' indoor meters for Temp., Press. & Rn;
 - So:
 - Occupants can observe their bldg.'s variations in Temp., Press. & Rn over hours-years
 - They can see how indoor air **sample(s)** from **most** one Day or Week+ can **mean very little**, RE:
 - Long term chronic exposure risks (like cancer)

• Or

- Short-term (e.g., 1-day 'peak') exposure risk (e.g., in utero/developmental effects)
- Unless the samples are collected at Times of most concern/representing most exposures

*Provided by EPA for this Pilot-Communities concept testing

If we *need to* **sample indoors** for cVOC-VI chemicals; Our Proposal* is Primarily to:

- Allow the collection of **typically 'low' numbers** of indoor cVOC samples
 - for initial/on-going assessments (e.g., ~4/bldg.)
- But only if:
 - They are **set in a** *context* of <u>more frequent</u> measurements**
 - That can:
 - Indicate (VI-drivers w/ assoc. observed; e.g., Temp. & Press.)
 - Trace (other components in soil gas that move with cVOCs) (e.g., Rn)
 - Shape of the distribution across Time & Guide cVOC sampling
 - Space: Assess all Bldgs' for susceptibility to soil gas (pot. cVI) intrusion
 - Times more likely to represent some of upper 50% of tot. Exposure

*to improve VI (under **RCRA)**; **By **Citizen/Community-Scientists** w/ ITS meters in their bldgs.

Quantitative Confidence in Exposure Risks Two Risk Metrics: Chronic & Short-term

- **Chronic** risk is about **long-term average** risk & for confident decisions we use:
- 95th% Upper Confidence Limit on the Mean (average) bare min. 3-7* samples (variability)
 '95UCL' of mean (average) exposure concentration
- Short-term risk is about short-term exposures in periods of vulnerability
 - Reasonable Maximum Exposure (RME; Between 90th 98th %ile conc.) EPA VIG, 2015
 - We're using a ~central-point-estimate of the range of RME (95th%ile) of exposure concentration
 - i.e., Conc. averaged over the 'period of concern' for the outcome of concern, e.g.,
 - For short-term/sub-chronic effects, like in-utero/Developmental, could be a low as 1 day**
- Summary Note 1: 95UCL can > 95th%ile conc. for small sample # w/ high variability
- Summary Note 2: Infrequent High Conc. Peaks can drive both!

* https://www.nj.gov/dep/srp/guidance/rs/proucl.pdf
**https://www.epa.gov/risk/guidelines-developmental-toxicity-risk-assessment

Continuous measurement of cVI (TCE) at 'Sun Devil Manor'

A few **Conc.** (points at most *any* time) does **NOT** represent **VI Exposure**

VI Distributions/Expos. Driven by Peaks

Log scale

Assumed collection of 4 samples & text here shows Probability & interpret. for 0 & 1 (out of 4 <u>random</u> samples) a) >50%ile of **Exposure** b) > Mean **conc**.



Dr. Paul Johnson's slide 20/48 - Note audio recording of presentation also available at: https://iavi.rti.org/attachments/WorkshopsAndConferences/05 Johnson 03-19-13.pdf

Temporal Variability at Multiple Sites



Sampling '*non*-Normal' dist. of VI **conc**. in indoor air to represent ~Avg. *cumulative (total)* **Exposure** is <u>NOT easy</u>



- **Regulator-teams** will (*for this study*):
- Work with the RP/authorities & consultants to Ensure they:
 - Identify ALL buildings that are w/n 'proximity' 'at risk' of VI due to their/a VI source
 - Sample soil gas nearby (e.g., <6 ft) 'all' bldgs. for cVOCs to know if the cVI chemicals are adjacent to each bldg.
- Provide 'Community-Scientist' **Training** to help community members:
 - who are interested in the science behind ensuring their own safety from cVI
 - Interpret the meaning of the ITS data they have been observing/collecting
 - &
 - **Decide when** they might be **most concerned/interested** in indoor cVOC-VI **sampling**
 - & (*if* needed/wanted and if practical)
 - Know How they could collect their own indoor air cVOC sample(s) for VI
 - At the **most appropriate Time**

- Communities with their own Evidence & support of Regulator-teams:
 - Could 'bring to the table' and show:
 - THEIR own Evidence & Perspectives* to RP/Author. decision-makers
 - Regarding THEIR own Exposures
- For example, this could include:
 - 1) Reminder (to RP/Auth.) Our Bldg. still 'overlies' your cVOC-VI source & is 'at risk' for cVI**
 - 2) Reminder The Soil Gas nearby (our home/office/bldg.) contains your cVI chemicals**
 - 3) Our ITS Evidence shows the same nearby soil gas is intruding into our Indoor Air** e.g., Levels of the Tracer of soil gas entry (Rn) are > Outdoors, by up to ____ x times***
 - We'd prefer you control/remove the (now) cVOC-contaminated soil gas around our bldg./soils
 Or
 - 5) Sample our indoor air at the Time of our choosing; e.g.;

a) e.g., At times when soil/conduit gas intrusion is known (via elevated ITS levels) to be 'turned on') &

b) Continue 'as needed' over 'all' future times, while our bldgs. remain 'at risk'; overlying your cVI source****

*Hypothetical examples here **If evidence shows it is/does ***cVI can be x² (compared to Rn)

**** meters will be monitoring for more elevated cond. ²³

This approach can address the: **Two Basic Tenets** of Environmental Justice*

• Equal Protection

- from 'risky' exposures** [now only getting 'spotty' protection]
 - e.g., due to un-recognized Spatial & Temporal variability
- Equal Access to meaningful participation
 - And fair *representation* in **risk decisions**
 - e.g., <u>Spatial</u> (bldg.-bldg.) variability
 - (i.e., almost un-tested/un-studied)***
 - Functional Theme: *Minimizing* the <u>Opportunities</u> for *In*justice (in exposures)

*Little & Pennell Measuring Vapor Intrusion: From Source Science Politics to a Transdisciplinary Approach (Environ. Sociology, 2016) **Subject to regulatory (e.g., RCRA) authority for Corrective Action ***Very difficult to get access to study new bldgs. in detail – ORD plans for a major step forward – later today

- When the Majority (>50%) of the Bldgs. *still* 'at risk' for cVI within a neighborhood boundary* can show they have **on-going evidence**** that:
 - With- or with-Out engineered vapor controls, they:
- <u>Qual</u>itatively Do NOT have a Complete pathway for VI exposure, because:
 1) cVI chemicals are NOT <u>present</u> in <u>soil</u>/conduit <u>gas</u> surrounding their buildings *or*2) Soil/conduit gases are NOT <u>intruding</u> into indoor air (e.g., >> outdoor, Rn background), *or*3) cVOC-VI chemicals are NOT Detected in indoor air, *Or*Although a 'Complete' Pathway for (*unavoidable indoor*) Exposure ... cVOC **# Pb, Rn**
- If ____# ~OK <u>Confident</u> No Unacceptable Conc. (> ___#) in our indoor air, from cVI
 - i.e., From Times when soil/conduit gas intrusion is known to be 'turned on' (via ITS, e.g., Rn)
 - If Can show this <u>'on-going' evidence of protection</u>;** they are a Soil Gas Safe Community

*To be discussed **For as long as they remain 'at risk' i.e., 'above' a cVOC-VI source(s)

'Soil Gas Safe' – Label/Name & the *Big Picture*

- We've have been *warned*/cautioned
 - by Communication Experts
 - Involved in major EPA labelling efforts, e.g., Energy Star
- 'Soil Gas Safe'
 - Is NOT common or familiar term for most members of the public*
 - May not be the best label for this effort
- Your Suggestions are welcomed:
 - But; we believe part of the value here is Education**

*Except to Geologist, who like it

** Everyone should know soil gas was never any good to breathe; & it's getting worse; Public Health Awareness

Help Stop Soil Gas Intrusion from Lowering IAQ

• Unquestionable some public health benefits – will follow (Rn 'alone')

never is w/ cVI

- Whenever cVI samples are collected (from Indoor air):
- There is going to be **some amount** of **soil gas (Rn*)** in that indoor air
 - Do you want that to be Unknown, Low, Avg., or High?
 - Personal recommendations**:
- Avoid collection of cVI indoor air samples when soil gas intrusion (Rn) is 'Low'***

* That can be correlated with the **Conc.** of **the** soil gas marker/**Tracer Rn** in the indoor air

** Given what we 'know' today

** for your building's natural range of indoor Rn levels (e.g., <90th%ile of bldg-specific distribution)

Calculated Percentiles (rank order distributions; *not* conc. scale) – w/o Re: sequence/time



Sampling for TCE when the Rn level is <80th%ile gives a >40% probability (~1/2) of finding a ND TCE value! You need to know the building's %ile of Radon conc. when chem. sample is collected to understand what chemical conc. found represents. If sampling when Rn was >80th%, or even better >90th%, you <u>could</u> find much higher TCE levels₂₈



Limitations & Uncertainties ~ *for the High side* Good correlations of High Rn & High cVI observed in many bldgs.

- Radon intrusion is very similar to chemical once they have entered the 'man'-built environment, but not in the subsurface – Work in Progress: e.g.,
- Origin and **Source** of Rn & Chemicals *in the subsurface* can differ:
 - Location of the source esp. relative to openings into building maybe not =
 - Very little building-specific mapping of Rn in sub-slab soil gas (that I know of)
 - Rn & cVOCs can have Different Distributions/Loc., Pathways, & Access to openings to buildings
 - Strength of source/flux rates
 - Rn gas comes from naturally distributed Radium minerals within rocks/soils (not-mobile)
 - Rn is generated by constant radioactive decay you can set your watch by it
 - cVOCs in the subsurface can be Orders of Magnitude higher here or there and
 - Vary in location/conc. with time (mobile) with groundwater/soil-gas/vapor transport
- Long-term Stewardship Testing needs to start soon
 - If Rn levels remain 'Low' = Protected from cVI?

This is an **Opportunity** Supported by **EPA resources**

• For:

- Communities
 - High/Research-Quality cVI Exposure Assessments (ORD QA/QC plans, ... etc.)
- EPA ORD & Cleanup Programs:
 - Field testing 'guidance' for Improving cVI Protection
- Regions & States
 - Helping assess cVI cases/facilities with unknown potential, sooner than otherwise
- Prioritizing:
 - Communities with EJ concerns
 - Communities 'trapped' in VI-probable real estate by economic constraints
 - Communities with concerns their VI assessment too slow or RP trust issues
 - Resource-limited cases that would not be addressed in a timely manner otherwise
 - Cases where there is a long history of possible past VI (& other pathway) exposures
 - Contact: Brian Schumacher & John Zimmerman., cc: Schuver & Crincoli

Thank You