



Mostly 'pipe' VI



Some 'pipe' VI

# *Introduction to* Measurement-Based Methods for Protective & Defensible Chlorinated VI Exposure Determinations

Workshop to Incorporate Regulatory Perspectives

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\* [Personal Perspective & Presentation – Does not represent Agency policy](#)

See: <https://iavi.rti.org/workshopsandconferences.cfm> and <http://epa.gov/oswer/vaporintrusion>

# Regulatory Context for Workshop

## >20 years ago (1999) EPA cautioned ... Re: VI\*

<sup>2</sup> This [VI] is ***a rapidly developing field*** and reviewers are encouraged to ***look to the latest guidance*** for the ***appropriate methods*** and ***scale of demonstration*** necessary to be ***reasonably certain*** that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does **not** present **unacceptable** risks.

**2019 – Find Unacceptable VI exposures have been on-going ...**

- At ***previously-assessed*** sites
- One community w/ > child disease rates; Mothers sampled own indoor air to find on-going VI exposures ...
- EPA's **Inspector General** – recommends **verifying the accuracy of *all* EI (incl. VI) determinations**
  - **[Epa.gov/office-inspector-general/report-management-alert-certain-risk-communication-information](https://epa.gov/office-inspector-general/report-management-alert-certain-risk-communication-information)**
  - **Strong interest** in making sure we **don't have any more surprises** like that
  - **&**
- **RCRA has a major EI measurement # Goal deadline by Dec. 2020** – those *need to be accurate*
  - **It may be time to update Footnote 2 and make more specific ...**

\*RCRA Human Exposure EI (Environmental Indicator) -Interim Final, Feb. 1999, **Question 2**

Ques. 2 - Media “reasonably suspected to be “contaminated”” – Air (indoors) <sup>2</sup>

- [https://www.epa.gov/sites/production/files/2016-04/documents/ei\\_guida.pdf](https://www.epa.gov/sites/production/files/2016-04/documents/ei_guida.pdf) = EI forms/guidance
- <https://clu-in.org/eiforum2000/> - EI guidance Training slides

# If you were asked to characterize Confidence for sub-chronic/developmental exposures

- Indoor air Samples representing the Exposures of concern
  - Building
  - Site
  - e.g., \_\_\_% Confidence
  - How would you do that?                      What evidence would you use?
  - That has been our challenge for > 20 years - & led to today's workshop

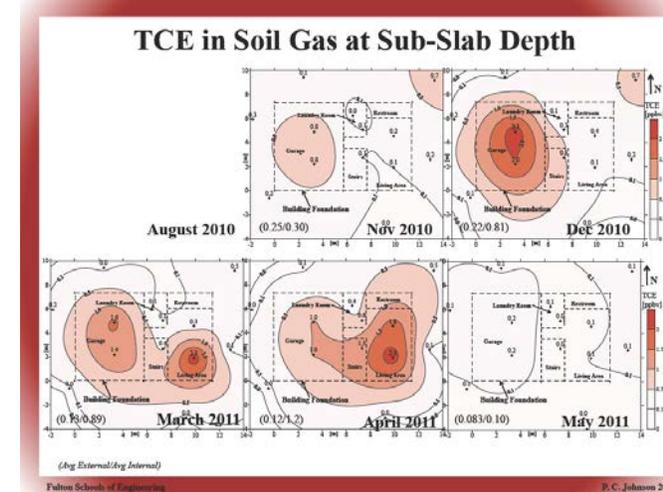
# Technical Background:

Why supplemental measurements (MLE)?

- ***Only indoor air conc.*** – reflects all variables\*
  - Rich-data-sets show **Highly variable** across **Time** (& Space)
- Chemical measurements – **expensive\*\*** & **disruptive** to occupants: **1-4?**
  - Confidence in exposures is typically **low** – so need Multiple Lines of ‘Evidence’
  - Hypothesis today – The MORE **MEASURABLE** VI-associated evidence the Better

\*Model predictions of VI have **not** been **validated**  
(e.g., one attempt since 1992 – only works if silt is considered sand ...)  
**Soil gas conc. weakly correlated** with indoor conc. (**Atten. Fact. vary over S & T**)

\*\*access, clearing ‘background’ sources, collection & analysis



# Quantifiable Confidence – Still *missing* for VI

- Quantifiable Objectives for Confidence – e.g. **guidance** criteria:
  - **95<sup>th</sup> UCL\*** on Mean (chronic effects)
  - **95<sup>th</sup> %ile\*\*** RME (sub-chronic effects)
- These Goals **are achievable** for various environmental media/exposure pathways:
  - **Groundwater** ingestion
  - **Ambient Air** inhalation
  - **Soil Ingestion/Dermal** contact
- And **should be** demonstrably achievable for **Vapor Intrusion** exposures
  - **IF** we want to provide the same level of protection from VI as from other pathways
    - \* UCL = Upper Confidence Limit
    - \*\* a central estimate of RME range of 92<sup>nd</sup> to 98<sup>th</sup>%tile of exposure distribution

# How confident are we of VI exposure est.?

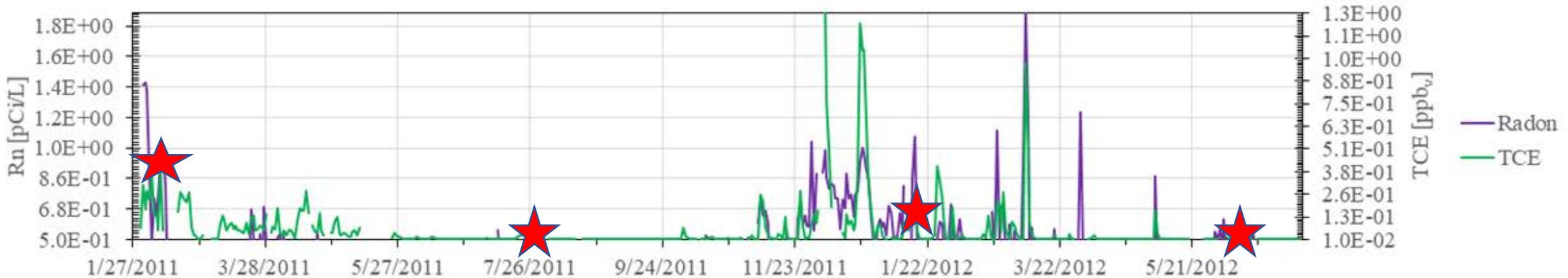
What level of confidence is appropriate?

- **Chronic risk**

- Long-term Average (95%UCL)
- Typical quarterly ~ OK ?

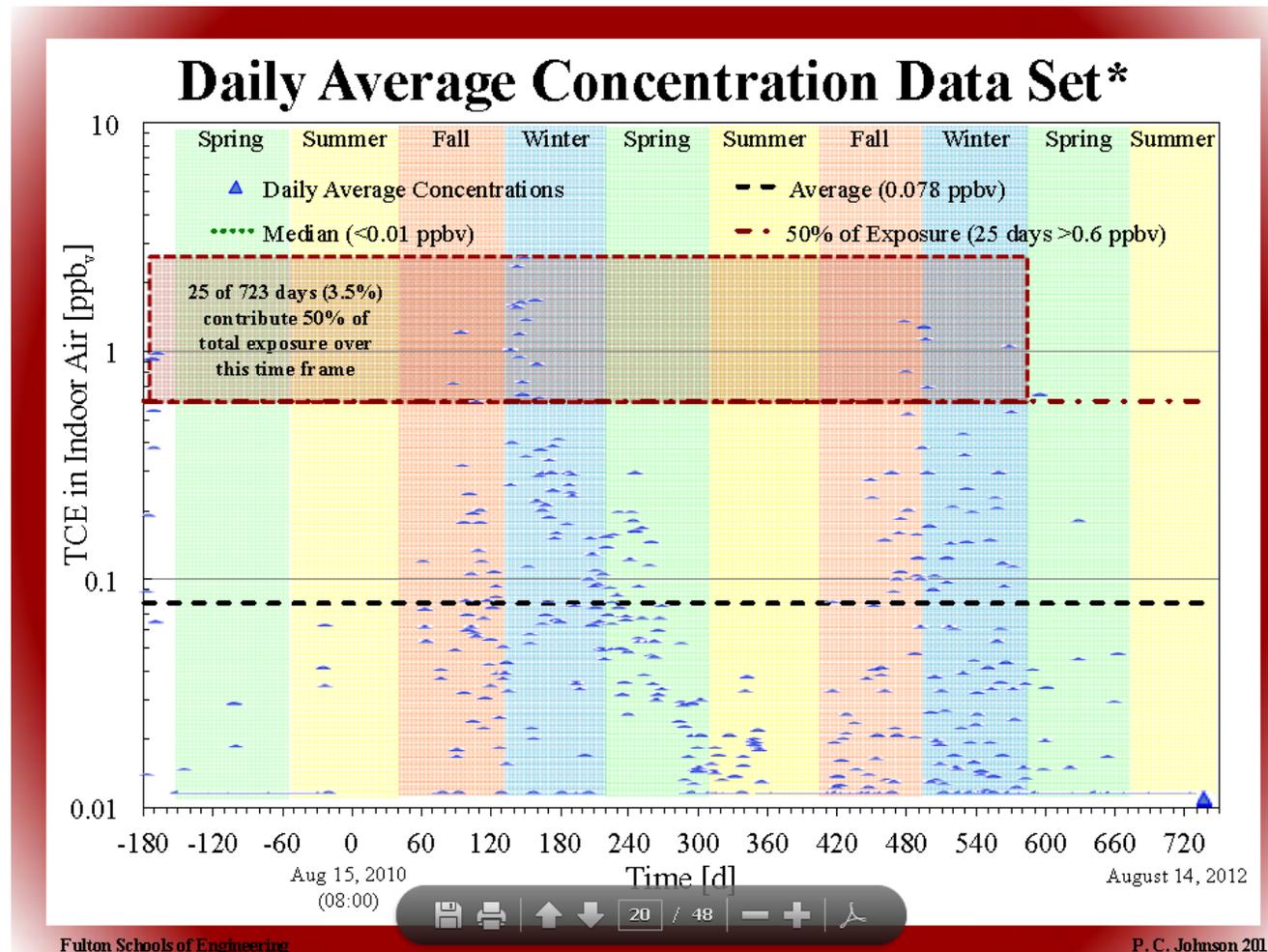
- **Sub-chronic (developmental) risk**

- Reasonable Max. Exposure (RME)
  - ~ 95<sup>th</sup>ile
- Could be as short as 1-day



Indoor air is *variable* & Episodic Peaks can Drive Exposure  
25 days (3.5%) present more exposure than the other 698 days

One building  
w/ 2-hr  
indoor air  
samples for  
~ 2 years



Chemical VI  
(TCE) at ASU's  
'Sun Devil  
Manor' (SDM)  
CVI research  
house

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](https://iavi.rti.org/attachments/WorkshopsAndConferences/05_Johnson_03-19-13.pdf)

# Disease Assoc.\*

## Short-term-effects

- TCE plume (70 block) area:
  - ~2615 residents, 1090 births (†)
    - 248 effects ~ 1/4
  - 117 Small for gestational age
    - RR = **1.23** (95% CI = 1.03-1.48)
  - 76 Low birth weight
    - RR = **1.36** (95% CI = 1.07-1.73)
  - 37 Term low birth weight
    - RR = **1.68** (95% CI = 1.20-2.34)
  - 15 Cardiac defects
    - RR = **2.15** (95% CI = 1.27-3.62)
  - 3 Conotruncal\*\* defects
    - RR = **4.91** (95% CI = 1.58-15.24)

\* Also a similar paper on increases in adult **cancers**

\*\* "abnormal formation of the outflow tracts of the heart"

(RR) Rate Ratios relative to the rest of NY state (excluding NYC)

<http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.1103884>

ehponline.org

"Conclusions: Maternal residence in both areas was associated with cardiac defects. Residence in the TCE area, but not the PCE area, was associated with low birth weight and fetal growth restriction."

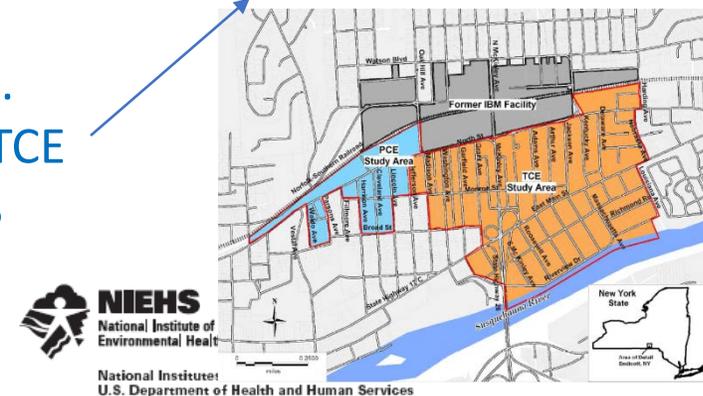
Maternal Exposure to Tetrachloroethylene and Trichloroethylene through Soil Vapor Intrusion and Adverse Birth Outcomes in New York State

Steven P. Forand, Elizabeth L. Lewis-Michl, Marta I. Gomez

<http://dx.doi.org/10.1289/ehp.1103884>

Online 5 December 2011

3 mos.  
after TCE  
in IRIS



Week 3: 15-21 days from fertilization - "Primitive heart tube is forming"

Week 4: 22-28 days from fertilization - "The heart bulges, further develops, and begins to beat in a regular rhythm."

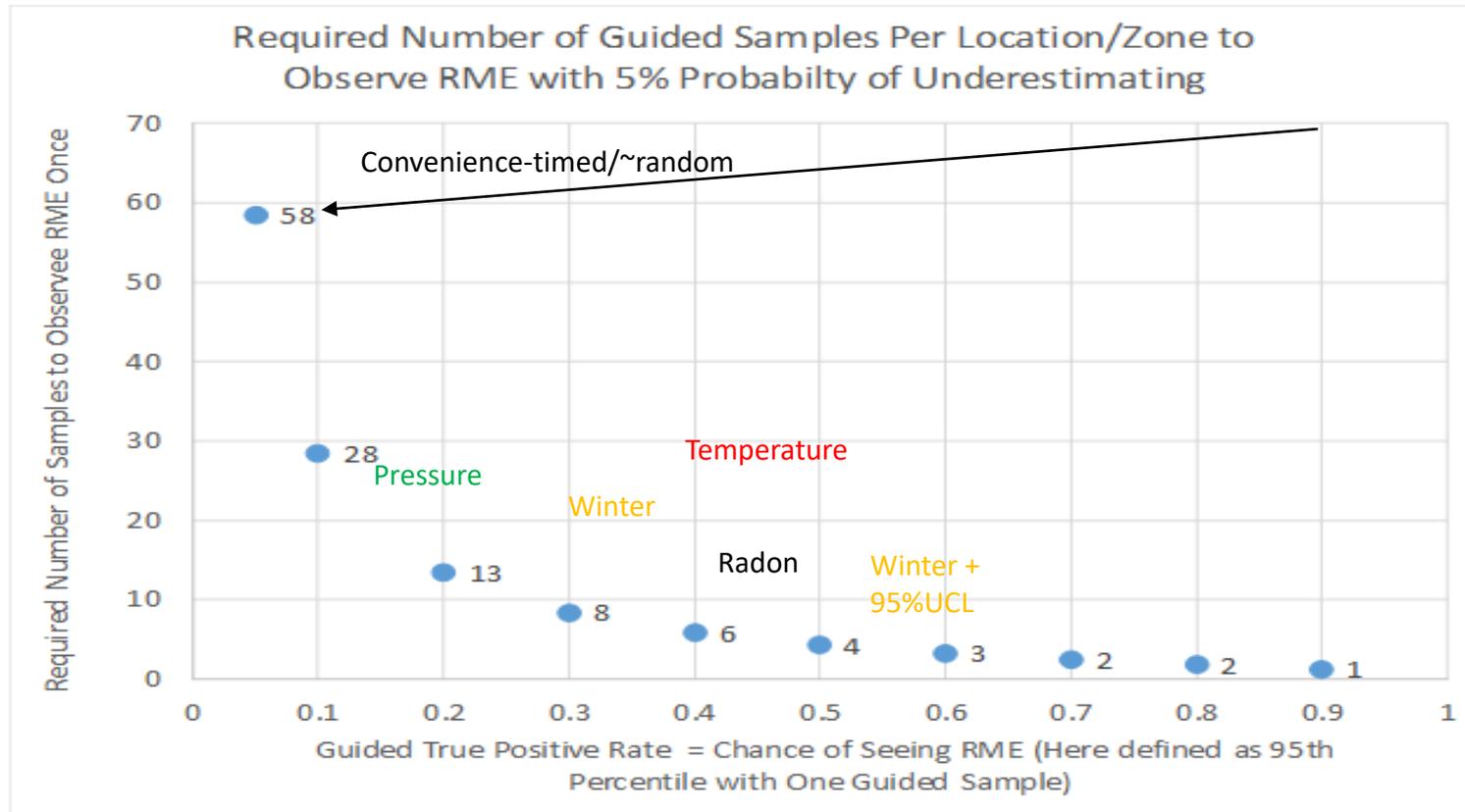
# How many samples do I need?

- **Indoor**-air chemical concentrations
- To be confident of your decision
  - 1) Where                      which (RME) building(s)
  - 2) When                        to represent RME
  - 3) How many

e.g., If CONTINUOUSLY unacceptable concentrations – Only 1

# How many Samples are Needed?

for Temporal variability (*per bldg.*) to represent 95<sup>th</sup>ile (RME)



Note:

To observe upper 5<sup>th</sup>ile expect ~1/20 samples by random chance,

for 95% conf. need ~3 x 20 (58)

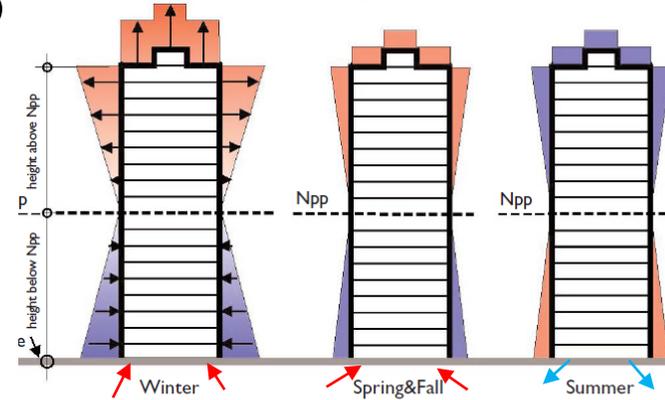
# Indicators, Tracers and Surrogates (ITS) as VI-associated *measurable physical features*:

- Relatively
  - Low cost, to measure
  - Practical measurements (as supplemental sampling evidence)
  - Can be statistically compared to Indoor CVOC conc. for possible statistical **Associations**
    - Temperature
    - Pressure
    - Radon (Rn)
- Measurements revealing conditions/forces Driving or Tracing VI at your site :
- Provides *insight into VI driving forces & building-factors **operating at the time of CVOC sampling*** (i.e., concurrent non-static measurements)
  - Improves interpretation (meaning/value) of *contemporaneous CVOC samples*
  - Could focus sampling on times & places most likely to have exposures of concern
  - **Reducing # of indoor CVOC samples needed**; i.e., to make decisions with **quantified/doc. percentile (%ile) of exposure** represented & Confidence levels

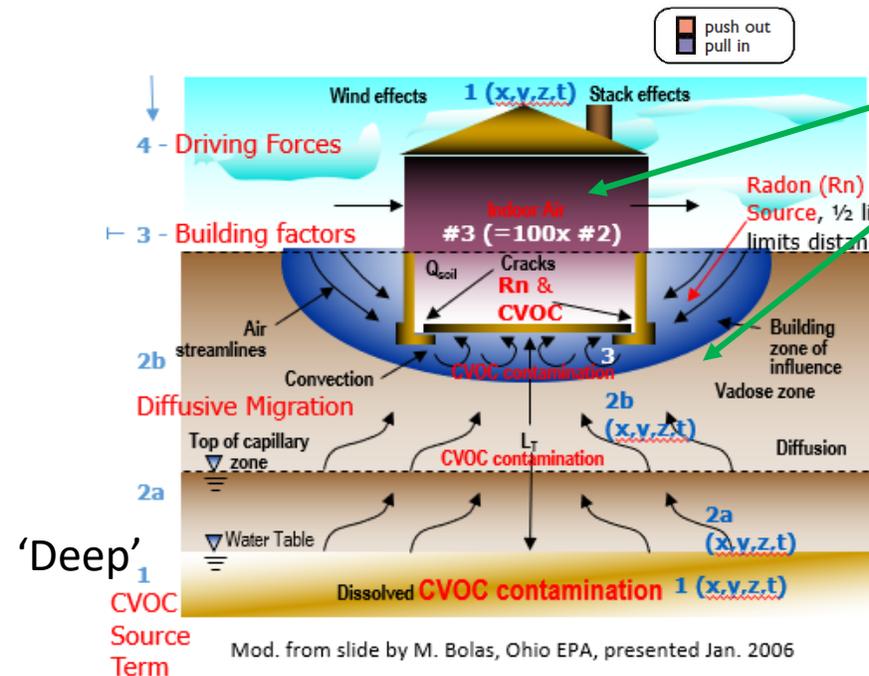
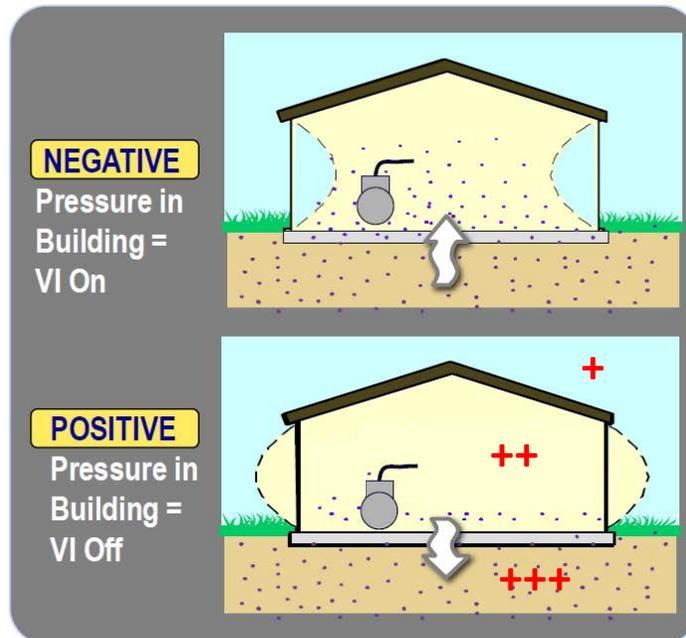
# Indicators, Tracers & Surrogates (ITS) generic Conceptual Site Models (CSM) for *Measurable evidence* – ITS

- Conceptual Model/Understanding for potentially useful applications
- **Temperature**, Out- & Differential
- **Pressure**, Out-, Indoor vs. Out- & SS
- **Radon**, Indoor, Diff. (In- vs Out- & SS)

**Temperature** - condition



**Pressure** - Force



**Radon** - Tracer  
[conc.]

**Building-specific Conc. integrating:**

- 1-Intrusion
- 2-Mixing
- 3-Retention - of 'near-building' SG, Rn, VOCs

# Indicators, Tracers & Surrogates

Supplemental Lines of Evidence are *Not* Equal

## Summary of conceptual relationships

(as of Sept. 2019)

### Includes:

7) All factors influencing VI

5) All nearby & Bldg. factors\*  
mixing & *integration* indoors

3) Wind (sp. & dir.), HVAC

1) Primary VI Driver

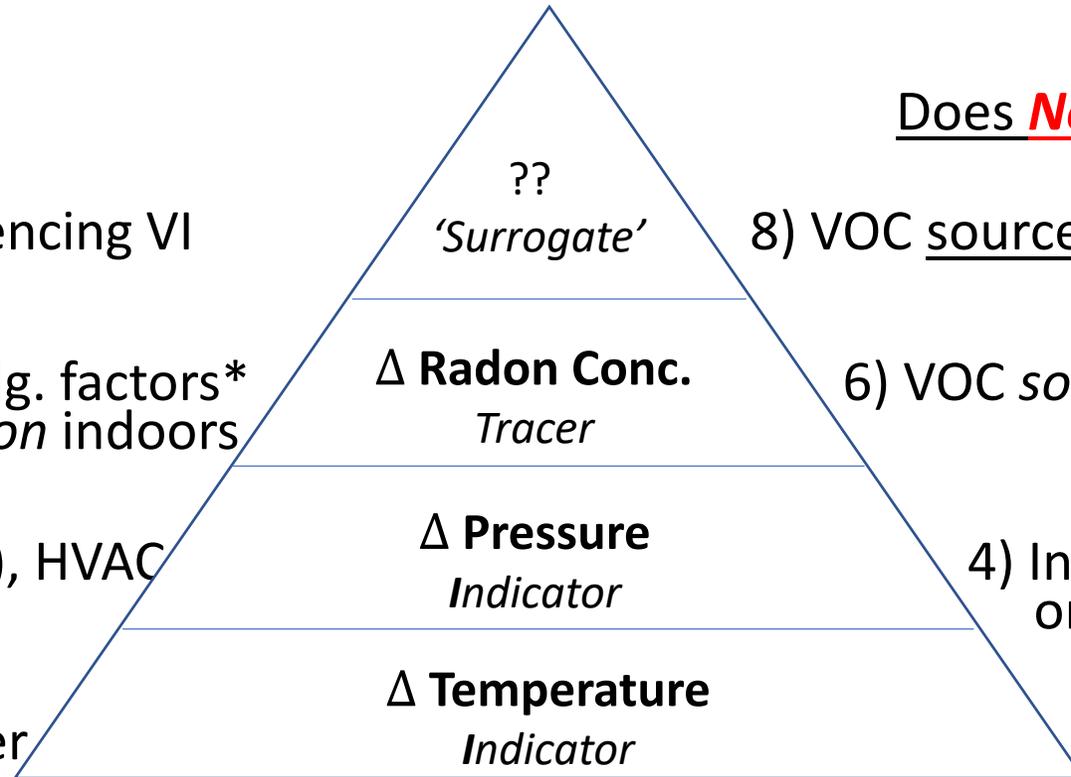
### Does **Not** include:

8) VOC source variation? (Space & Time)

6) VOC *source* vari. & Deep migrat./path.

4) Integration of Areas (SubSlab)  
or Time, Air Ex. Rates (AER)

2) Wind (sp. & dir.), HVAC



\*Indoor **conc.** when Rn is sampled

# USEPA Radon polices recognize Differences & Changes in Buildings: *Sample indoor air in **all buildings**, & **through time***

## 1) Design

- Ground contact
- Heating type, HVAC
- Height, elevation, orientation ...
- Vegetation?

## 2) Construction

## 3) Condition

## 4) Occupants/Operation

## 5) Natural changes

## 6) Man-made changes

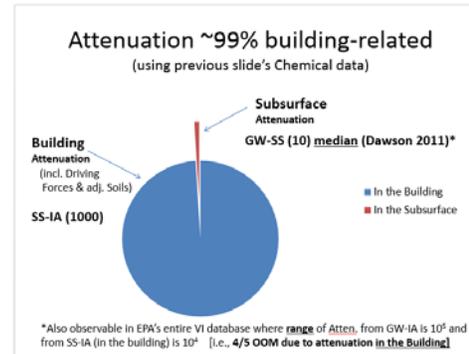
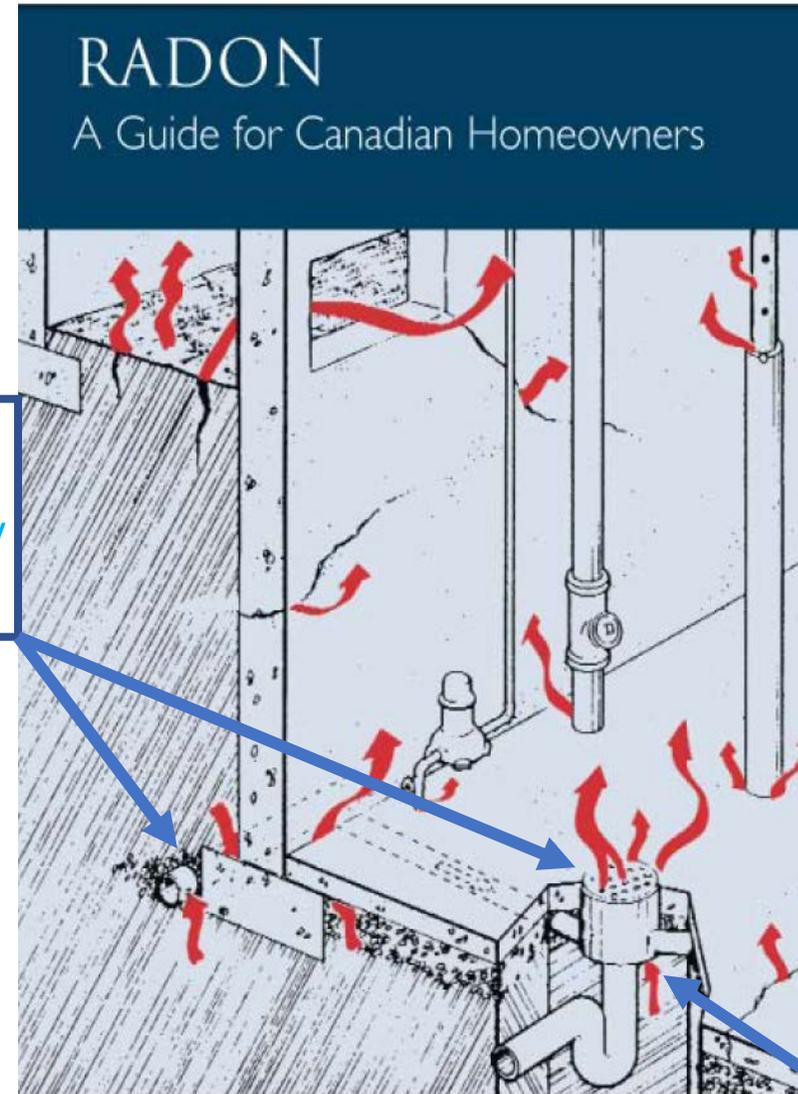
See:

*What is the Evidence for Stopping All Monitoring for VI?* (Sept. 10)

*What is the Evidence for LTS vs. Stopping All Monitoring (SAM)?* (Nov. 19)

<https://iavi.rti.org/WorkshopsAndConferences.cfm>

Radon reflects ALL pathways, including 'alt./ anthropogenic



Attn: 99% SS-IA

Also, not shown here, building-specific **exit** paths above ground

It's **Entry, Mixing & Retention**

# Statistical Assoc. of Conc. across Time

Using Time Series (Linear) Regression; results for Two components:

1) **Direction** of Conc. change. (*Qual.*)

99% (EPA-IN)  
99.9% (SDM-UT)

Changing conc. direction together

Note Background (outdoor) Rn & < Det. Limit for TCE

2) **Magnitude**

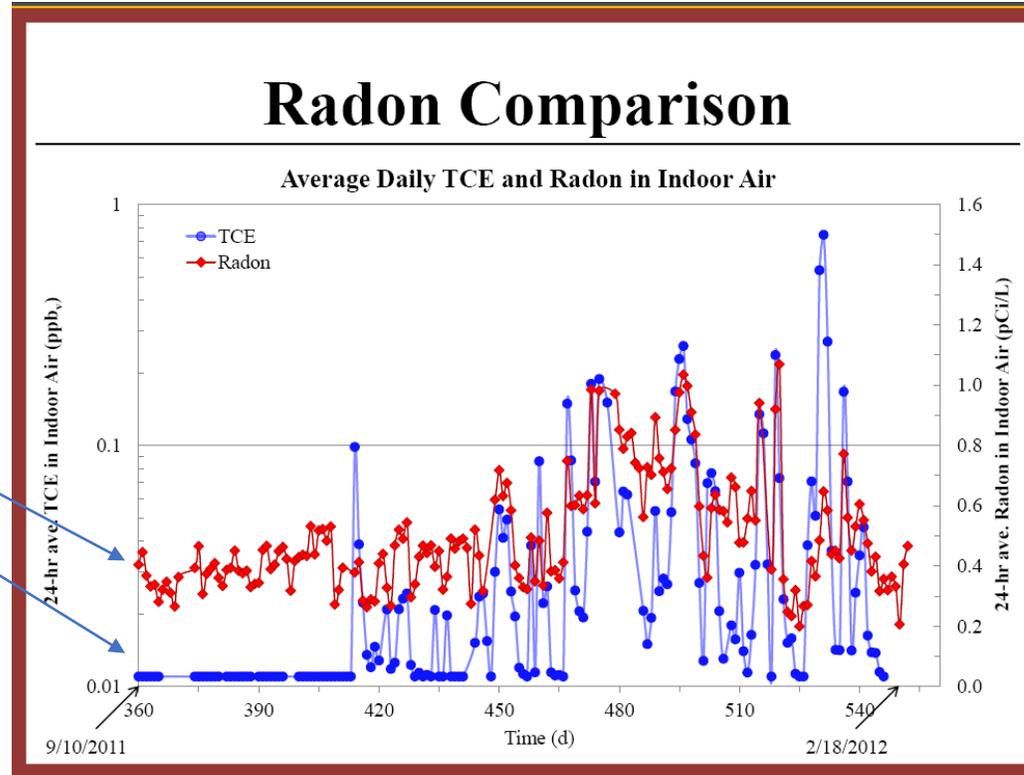
*Quantitative*  
*'proportionality' of conc. change*

40% (EPA-IN)  
25%-60% (SDM-UT)

~ 1/2 of change in TCE Conc. explained by' the change in Rn conc. (R<sup>2</sup>)

Not confident enough for risk decision making

Time Series Regression  
*Not practical,*  
computationally for typical-site application –  
But highly informative when applied



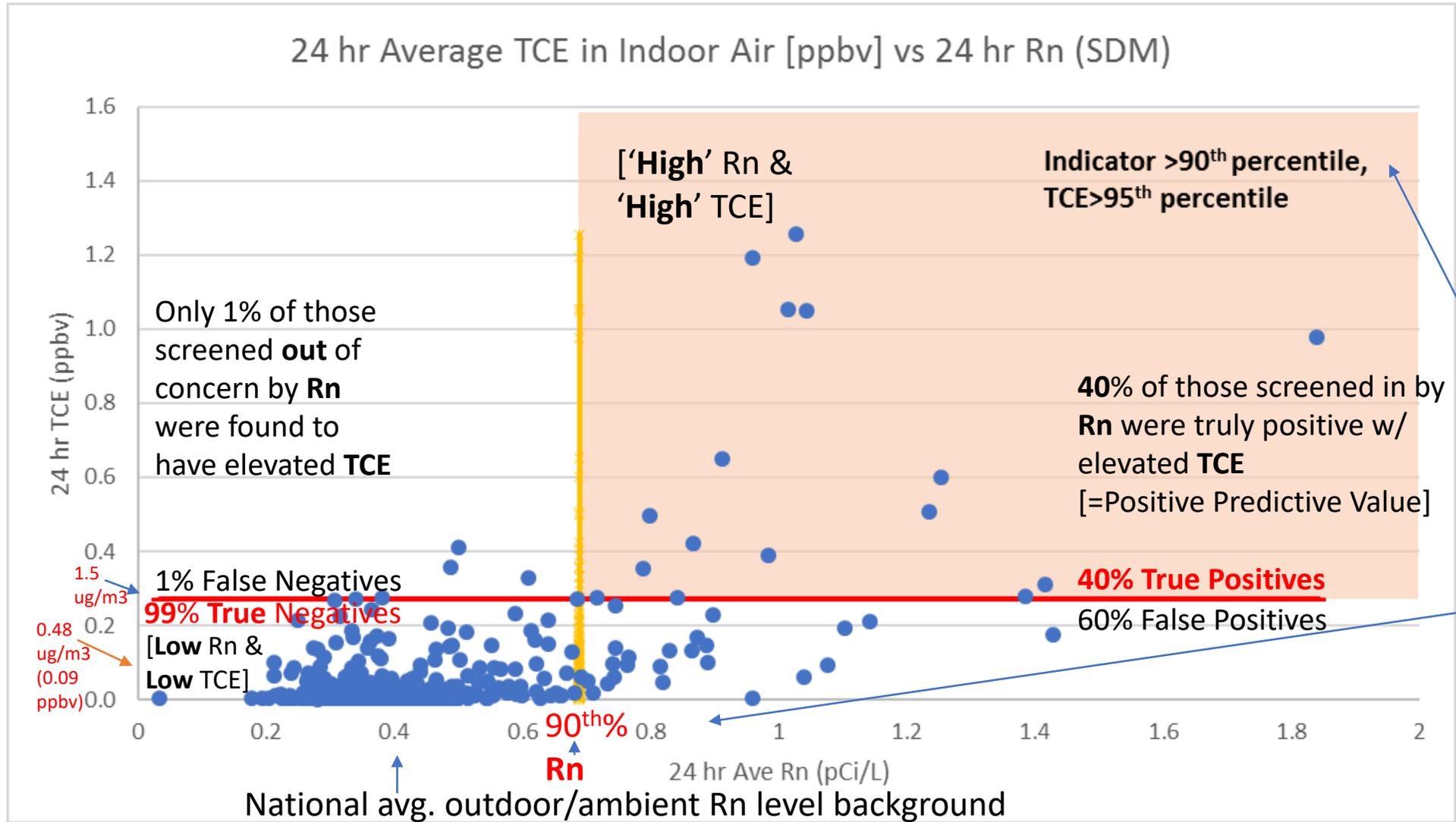
Sun Devil Manor (SDM), Layton, Utah



For Site application  
Tried Next:

Medical-  
*screening / decision*  
approach using  
categories of numbers  
(2x2 tables)

Not Diff. **Radon conc.** (indoor) as Indicator of TCE RME; at any **Time order**



Not practical; Trying to estimate and then time the chemical sample collection when Rn is elevated (>90%ile) is difficult

Diagnostic (Exposure) Screening of SDM house data, statistics by Kurtz

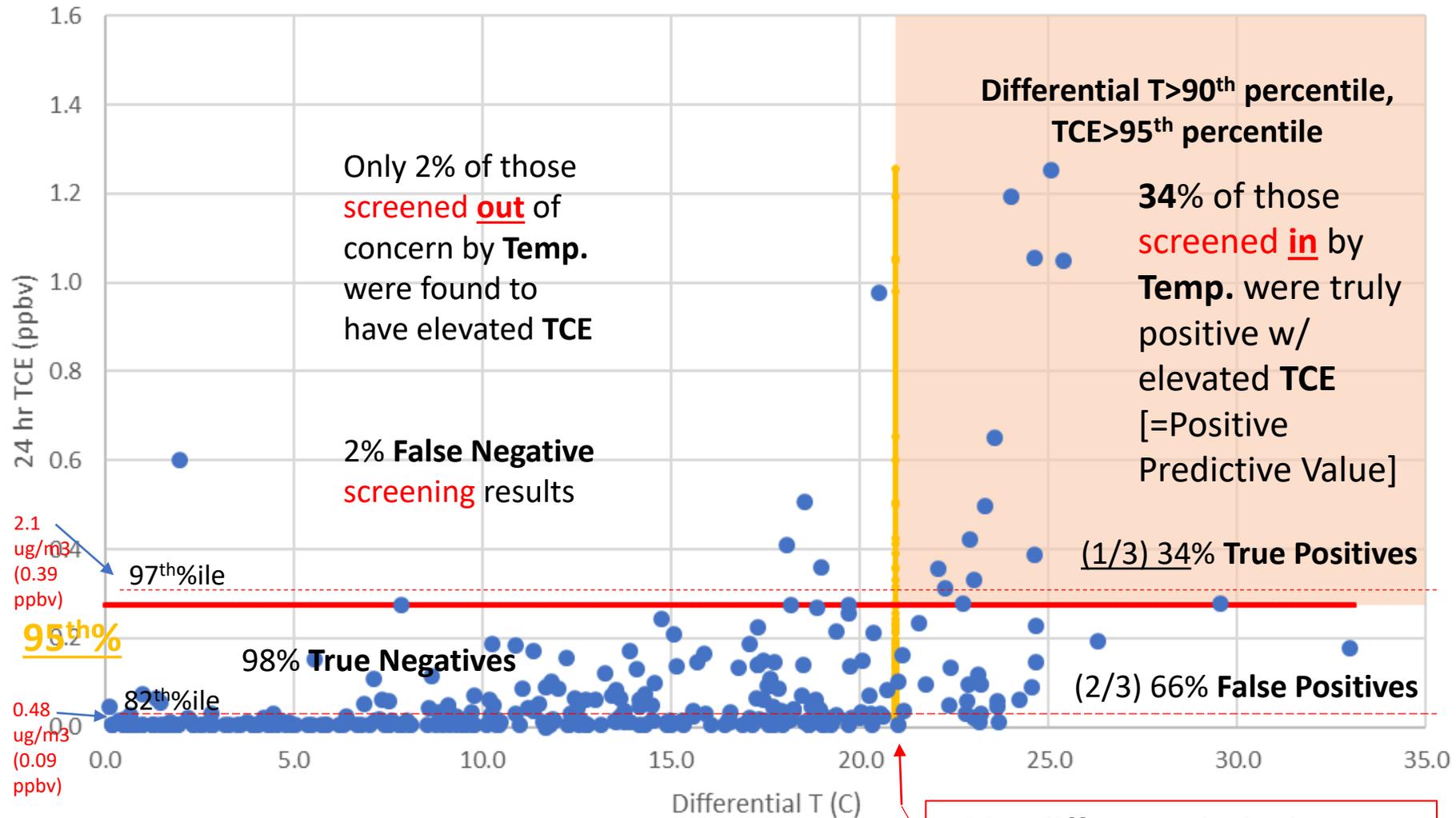
Looking for >95<sup>th</sup>% conc. of TCE, 99% of the data 'Indicated' by non-elevated (<90<sup>th</sup>%) Rn were **correctly** 'screened out'



# Differential Temperature Indicator (>90<sup>th</sup>%) Approach for RME – Validity Testing

Sun Devil Manor

24 h Average TCE in Indoor Air [ppbv] vs Differential T (SDM)



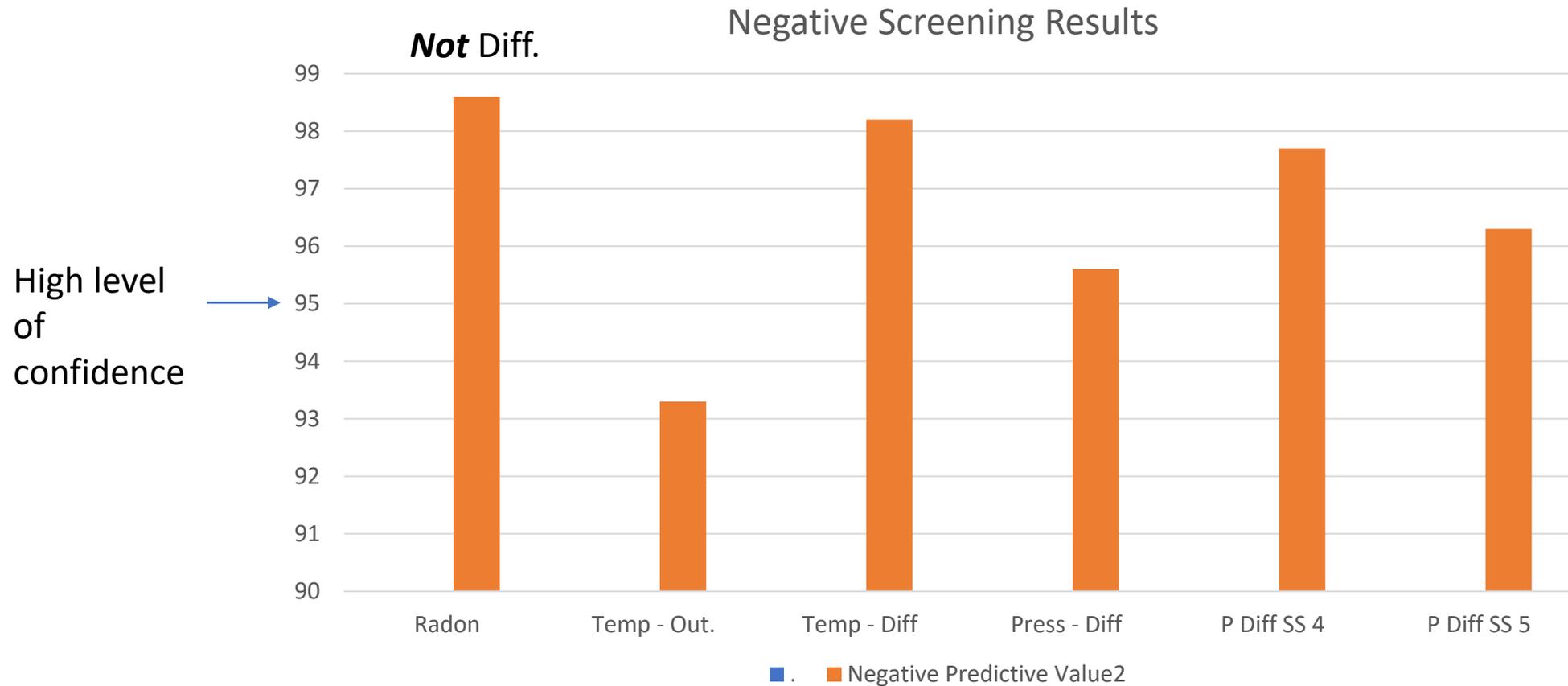
Note: If indoor temp. ~68 degrees F **outside** would need to be <30 degrees F as 24 hr. avg. to meet the 90<sup>th</sup>ile for temp. (in UT)

Dashed lines are Post-Work. 'cut' points

# Diagnostic (Exposure) Screening Results

## Negative Predictive Value – SDM [one house]

(probability of 'Low' ITS samples identifying 'Low' chemicals (<95%ile RME))



Most Obvious Observation/Conclusion (from March '18 Workshop)

# All three ITS metrics (T, P Rn) show highly-confident **Negative** Predictive Values:

- That is, >95%\* confidence that sampling for CVOCs when these ITS metrics are NOT 'elevated' will find:
- The CVOC sample conc. also NOT 'elevated'
  - Using **Rn**, this is almost certain (99% confident) for >95<sup>th</sup>ile
- This evidence suggests it is no longer useful (for regulators) to sample for CVOCs when these ITS are Not 'elevated'
- Possibly enough evidence to be 'Actionable' (**sample times**) now?
  - How Generalizable?
  - From two houses (dated 1915 & ~1995)



EPA's Indianapolis Duplex



Sun Devil Manor

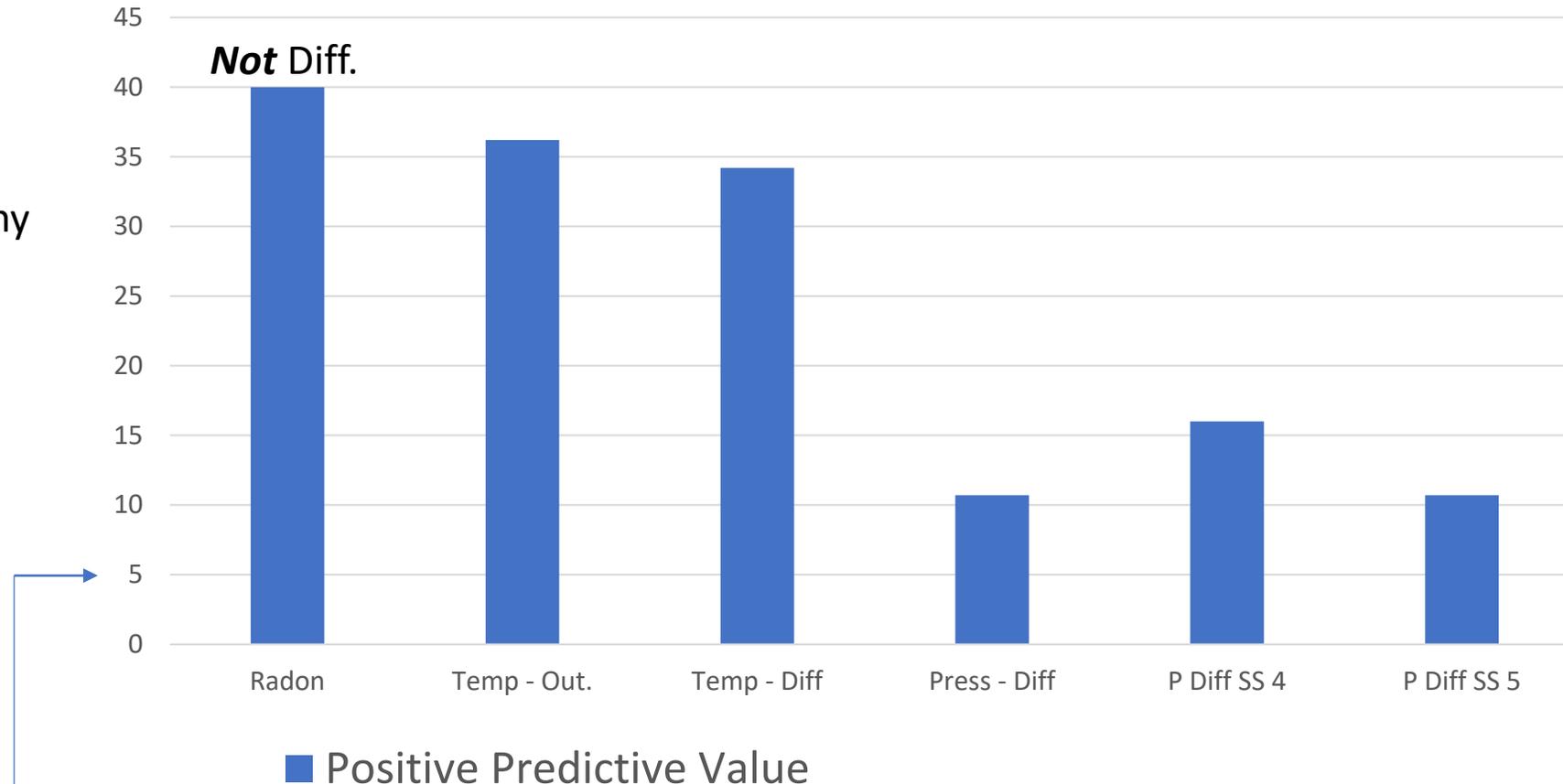
# Diagnostic (Exposure) Screening Results

## Positive Predictive Value - SDM

(probability of 'High' ITS samples identifying 'High' chemicals (>95% RME))

Percentile

Note: PSA & Mammography ~30% Positive Predictive Value

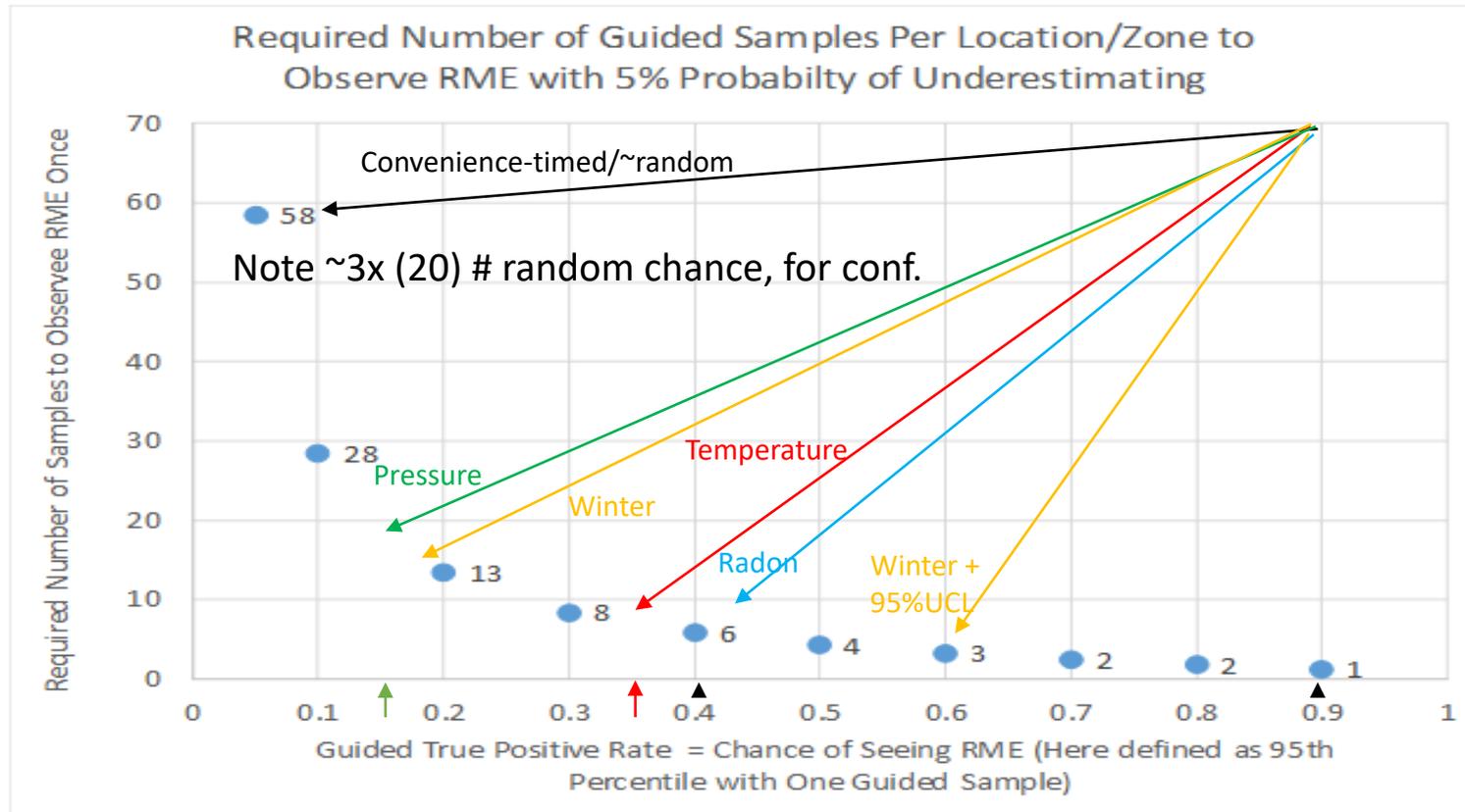


Random chance

Rn allows 8x higher chance (58/8 ~ 7 samples)

# How many Samples Needed to represent 95<sup>th</sup>ile (RME)

Using ITS' **Positive** Predictive Values Lowers Sample # Needed  
w/ High (95%) Confidence - Using *ITS-Guided* IAQ samples



Note: **Winter + 95%UCL**  
 Means 3 VOC samples in winter and then calculating the UCL for those values – typically results in risk conc. > than any observed; PRP use unlikely?

Number of samples needed to 'know' you have one sample > target TCE conc. of 95<sup>th</sup>ile (1.5 ug/m<sup>3</sup>)

[at a house, Sun Devil Manor – VI research house (formerly ASU), Layton, UT]

# Trying to Schedule and Collect CVOC samples when ITS are **elevated** is *Not easy*\*

- But, **Abundant/Continuous VI-assoc.** ITS data can be documented
  - **$\Delta$  Temperature**
    - Outdoor, **retrospective** weather records
    - Indoor-outdoor ( $\Delta T$ ) – relatively easy measurements
  - **$\Delta$  Pressure**
    - Outdoor, **retrospective** weather records
    - Indoor-outdoor (relatively easy); Sub-Slab (SS)-indoor (IA) – more difficult and intrusive
  - **$\Delta$  Radon**
    - Indoor & Indoor-outdoor – relatively easy measurements

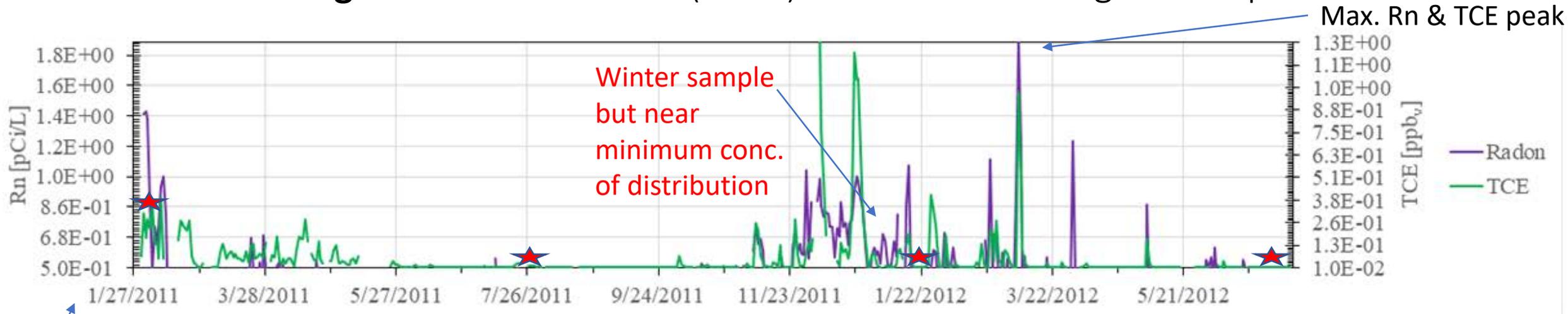
\*estimating future ITS trends, gaining access, clearing 'background' sources, & placement & collection of sample devices

# 'Continuous' Distributions of ITS (Rn & TCE)\*

Shows history & picture of a building's (soil gas/vapor) Intrusion behavior

Continuous Rn levels are possible/practical

Provides soil gas intrusion context (%iles) for few chemical grab sample events



\*Rn & TCE each plotted on their **respective** (Y-axis) **ranges** observed during baseline study – **research house**

Reasonable winter sample but not peak conc.

★ Hypothetical chemical grab sample event at scheduled interval

Rn curve provides context for chemical results and how  $\frac{3}{4}$  ★ were Not from periods of concern for RME

Indoor Rn & TCE at **SDM-UT** 2011-2012 (naturally-varying conditions) –

TCE & Rn Each presented over Range conc. found – to approximate their %ile of conc.

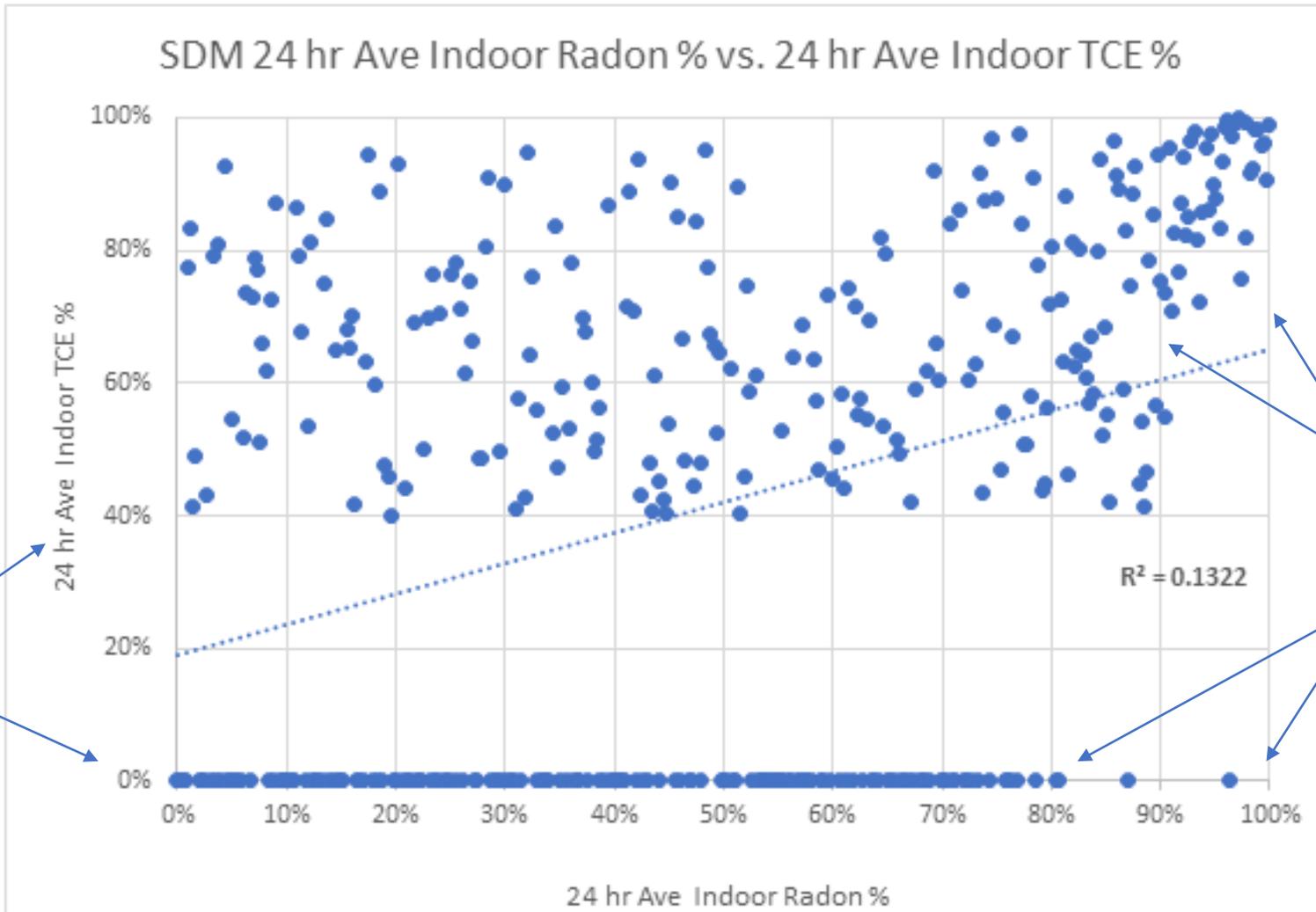
TCE conc. above reporting limit (0.011 ppbv) and

Rn conc. above the lower confidence limit of the RAD7 (0.5 pCi/L)

# Calculated Percentiles – w/o regard to sequence

Calculated Percentiles (%iles), including No-Detected (ND) values

~ 40% of the TCE levels are Non Detected



When >90<sup>th</sup>ile Rn, almost all TCE levels >70<sup>th</sup>ile & up to 100<sup>th</sup>ile (Highest TCE levels)

At >80<sup>th</sup>ile Rn near-lack of ND levels;

Sampling for TCE **when the Rn level is <80<sup>th</sup>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. When sampling when Rn was > 80<sup>th</sup>%, or even better >90<sup>th</sup>%, you could find much higher TCE levels

# Measured ITS %ile can document\* Positive Probability of finding TCE in levels of interest – Individual & Multiple samples

	<b>Rn %ile</b>	<b>Prob TCE &gt; 95%ile</b>	<b>~# Samples Needed*</b>
e.g.,	50th %	10%	28
	75th %	19%	13
	90th %	41%	6
	95th %	55%	4

<b>Total Probability for all four samples</b>	<b>81%</b>
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Note

Having Rn percentiles can allow probability of multiple samples to be **combined** for a (higher) total probability of having one or more samples from within the Exposure Levels of Interest – for regulatory decision making

\* And guide/help samplers decision to analyze chemical samples (or not)

\*If all samples have the same probability of finding a sample w/ TCE above the given target %ile (w/ 95% conf.)

We could use '*continuous*' Rn data to 'know' the **extent** (%ile) of soil gas intrusion which adds meaning to **occasional chemical sample results\***

- Grab sampling 1-day indoor air for chemical VI assessments, at:
  - Some random **Time** is:
  - Unlikely to find RME (i.e., >95<sup>th</sup>%ile) - & would have No Way of Knowing it, if you did
- The **meaning** and **context** of even multi. grab sample results will be **unclear**
- **We need to know When** VI is turned 'ON'
- Knowing Rn levels around VI chemical samples will **maximize** their **meaning**
  - by placing the chemical samples within the soil gas intrusion history of the building
    - & this makes possible:

**Quantitative Probability/Confidence levels** for small sample #'s

\*based on SDM house, more buildings being studied in Oct. workshop

# Two highly-studied buildings suggest: Possible Updates to EI-VI - footnote 2

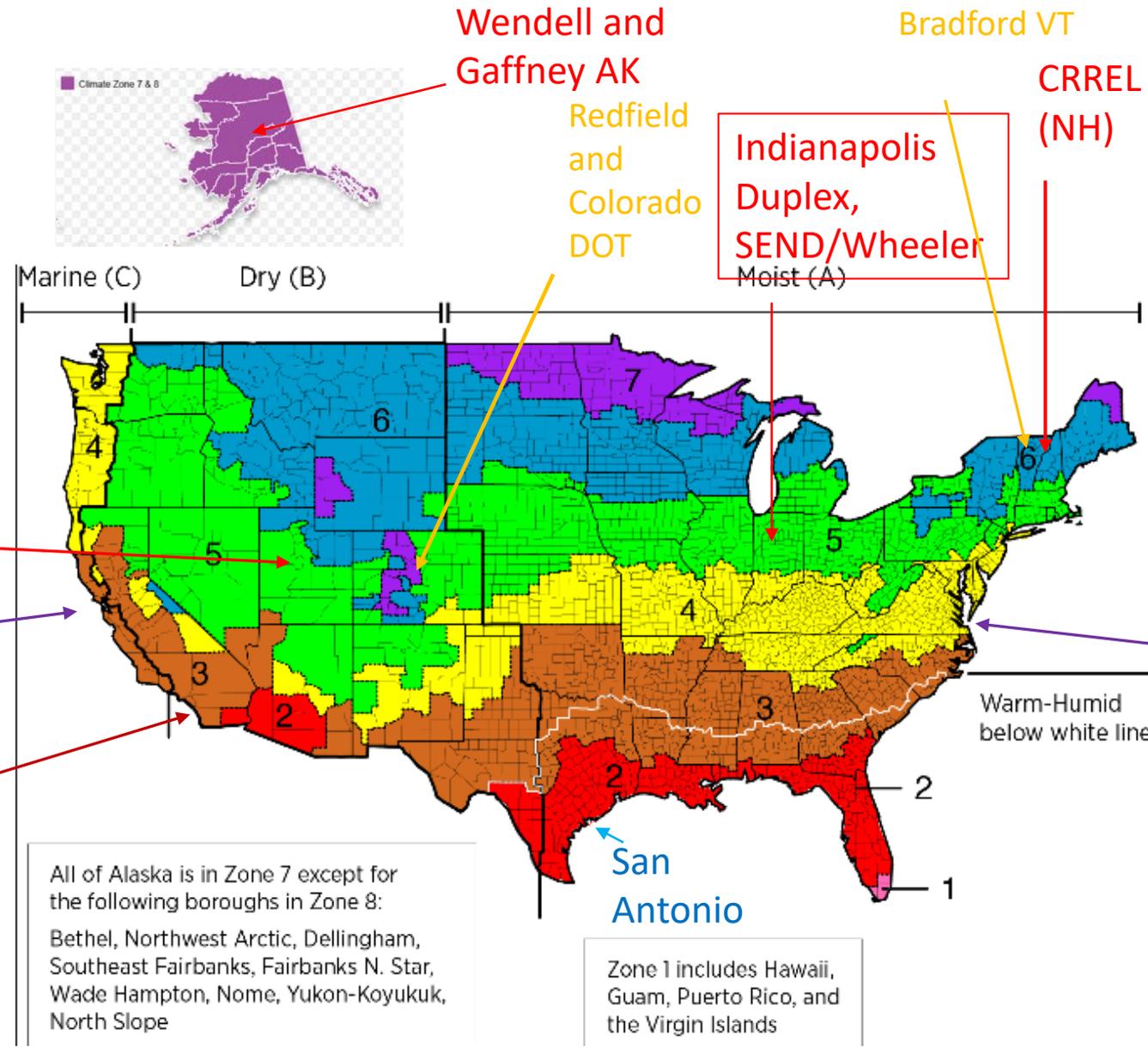
- Quantitatively estimate your confidence (e.g., \_\_\_%) that the indoor chemical sample concentrations collected represent the exposures of concern for the building, and briefly state the evidence supporting that estimate.
  - Or
- Do you have measured evidence that the **soil gas** intrusion was higher than **90%ile** for the building **when** chemical samples were **collected**?
  - **If not** it is **almost certain** the chemical sample would **not** represent the **RME** and
  - **If yes** the probability of the chemical sample representing the RME is **much higher than random** and potentially having **quantifiable confidence** of it's representation.

Evidence from two highly-studied homes shows:

# Quantitative Confidence for VI *is Possible*

- Using a **practical number** of chemical indoor air samples
- w/ **measured** evidence from VI-related physical features
  - e.g.,
    - ‘Low’ Diff. Rn, Temp., or Press. predicts ‘Low’ Chemical VI with **97** to **99%** confidence
    - ‘High’ Rn increase probability of representing >95<sup>th</sup>ile by **8 times** (over random chance)
- The **More** VI-related (i.e., ITS e.g., **Radon**, **Temp.**, & **Press.**) the **Better**
- This **Workshop** presents **Std Op. Prod.** for ITS measurements & tests **New data**
- For:
- **Measurement-Based Methods for Protective & Defensible Chlorinated VI Exposure Determinations**

# Today's Workshop – New data from new sites across the IECC Climate Zones



Wendell and Gaffney AK

Bradford VT

CRREL (NH)

Redfield and Colorado DOT

Indianapolis Duplex, SEND/Wheeler

Sun Devil Manor UT

MEW and Moffett Field CA

VA Military Sites A and B

North Island San Diego

San Antonio

Warm-Humid below white line

IECC zones Reprinted from <https://bascc.pnnl.gov/images/iecc-climate-zone-map>