Starting Soon: ITRC 1,4-Dioxane Training — Six (6) Part Modular Training

- ▶ 1,4 Dioxane Online Guidance Document, https://14d-1.itrcweb.org/.
- Download PowerPoint slides
 - ► CLU-IN training page at https://clu-in.org/conf/itrc/14D-1/. Under "Download Training Materials."

Use "Join Audio" option in lower left of Zoom webinar to listen to webinar Problems joining audio? Please call in manually

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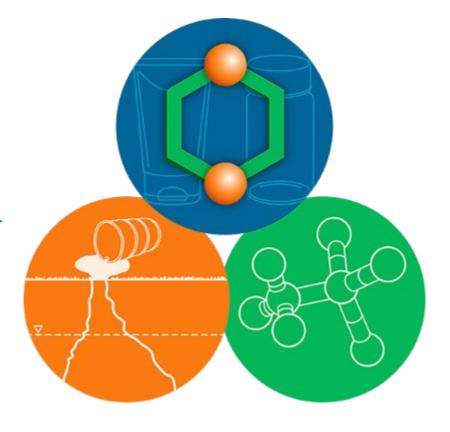






Advancing Environmental Solutions

ITRC 1,4-Dioxane: Science, Characterization & Analysis, and Remediation





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Course time is 2 hours and 15 minutes

- ► This event is being recorded
- ► Trainers control slides
 - ► Want to control your own slides? You can download presentation file on Clu-in training page (see related links box in Adobe Connect)

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- ► Throughout training: type in the "Q & A" box
- At end of class: Feedback form available from last slide
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 - ► Fill out the feedback form and check box for confirmation email and certificate (only available for full 1,4D-1 Training)



ITRC – Shaping the Future of Regulatory Acceptance

- ► Host organization Environmental Council of States (ECOS)
- Network
 - ► State regulators
 - ► All 50 states, PR, DC
 - ► Federal partners
 - ► ITRC Industry Affiliates Program
 - Academia
 - ► Community stakeholders
- ► Follow ITRC













DOE











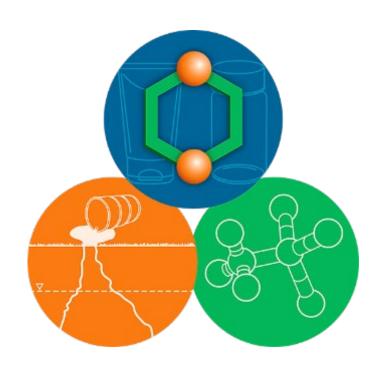
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 - Technical and regulatory guidance documents
 - ► Online and classroom training schedule
 - ► More...







1,4-Dioxane: Introduction





Lauren Larkin
Minnesota Pollution Control Agency
St. Paul, Minnesota
651-757-2066
lauren.larkin@state.mn.us









Advancing Environmental Solutions

Based on ITRC Guidance Document and Fact Sheets: ITRC 1,4-Dioxane Products (14d-1, February 2021)

6-Part Modular Training Series:

1,4-Dioxane: Science, Characterization, Analysis, and Remediation

Module 1: History of Use & Potential Sources

Module 2: Regulatory Framework

Module 3: Environmental Fate, Transport, &

Investigation Strategies

Module 4: Sampling & Analysis

Module 5: Toxicity & Risk Assessment

Module 6: Remediation & Treatment

Technologies



Online Documents and Accessing the Training Modules









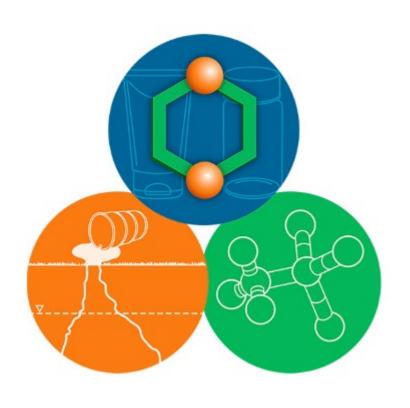
ITRC 1,4-Dioxane Products and Focus?

- ▶ Series of 1,4-Dioxane Fact Sheets (https://14d-1.itrcweb.org/fact-sheets/) Provide easy to access information about 1,4-Dioxane to answer immediate questions.
 - ► Toxicity and Risk Assessment Fact Sheet provides a summary of frequently asked questions regarding the potential human and ecological risks.
- ► 1,4-Dioxane Guidance Document (https://14d-1.itrcweb.org/) Provides an in-depth review and technical information that will assist the environmental community with 1,4-dioxane site management and cleanup.





Our Focus is on 1,4-Dioxane



- ► What is 1,4-Dioxane?
- ▶ Why Do We Care About 1,4-Dioxane?
 - ▶ 1,4-Dioxane Concerns
 - ► We are still learning about 1,4-Dioxane
- ▶ Use 1,4-Dioxane information and science to your advantage and apply best practices at your sites





Module 1: History of Use & Potential Sources



Lauren Larkin
Minnesota Pollution Control Agency
St. Paul, Minnesota
651-757-2066
lauren.larkin@state.mn.us

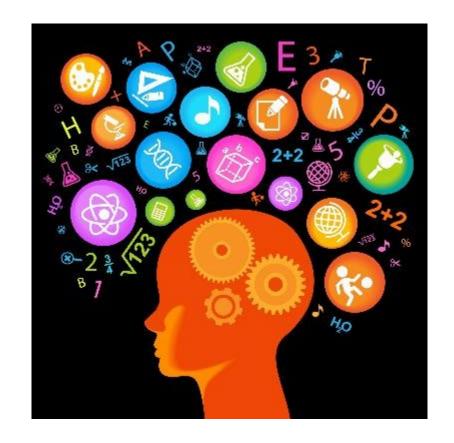






Learning Objectives

- ► Provide an overview of uses and potential sources of 1,4-dioxane to the environment
- ► Provide an understanding of the history of 1,4-dioxane manufacturing and usage
- ▶ Provide case study of "typical" 1,4-dioxane and chlorinated volatile organic compound (CVOC) impacted site



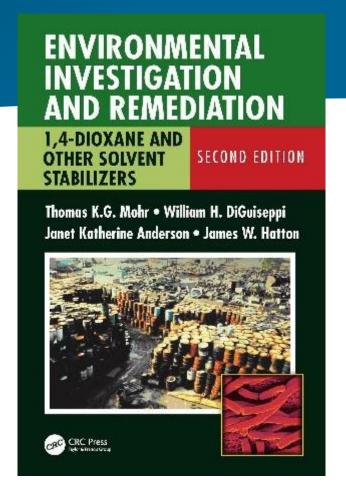
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1,4-Dioxane Uses

- ► Solvent stabilizers (90% of usage)
- Medical, pharmaceutical, and biotechnical
- Rubber and plastics, especially polyester manufacturing
- ► Inks, paints, and coatings
- Adhesives
- Automotive and aircraft fluids
- Many other uses



- ▶ 1,4-Dioxane manufacture, usage and release tied inextricably to 1,1,1-trichloroethane (1,1,1-TCA)
- ▶ Understanding that relationship/history helps understand where 1,4-dioxane is likely to be found





Why is 1,4-Dioxane Needed to Stabilize Solvents?

- ► Acids are formed as the solvent decomposes
- ▶ Reactions occur between the acids formed and the metals being degreased/plated, so stabilizers address acids:
 - ► Acid inhibitors prevent the formation of acids in the first place
 - ► Acid acceptors neutralize the acids that form
 - ► Metal inhibitors deactivate catalytic properties of metal surfaces and complex metal salts
- ▶ 1,4-Dioxane is dominantly used as a metal inhibitor





Was 1,4-Dioxane a Stabilizer in Trichloroethene?

- ► Trichloroethene (TCE) has been stabilized for vapor degreasing applications since 1940s, but 1,4-dioxane is not documented as the stabilizer used
- ► Extensive documentation (Mohr et al 2020) for 1,4-dioxane as a stabilizer for 1,1,1-TCA, but scant documentation for TCE
- ▶ Vague early patent literature describing TCE formulations
- ► TCE is substantially more stable than 1,1,1-TCA

May not matter because of association between TCE and 1,1,1-TCA

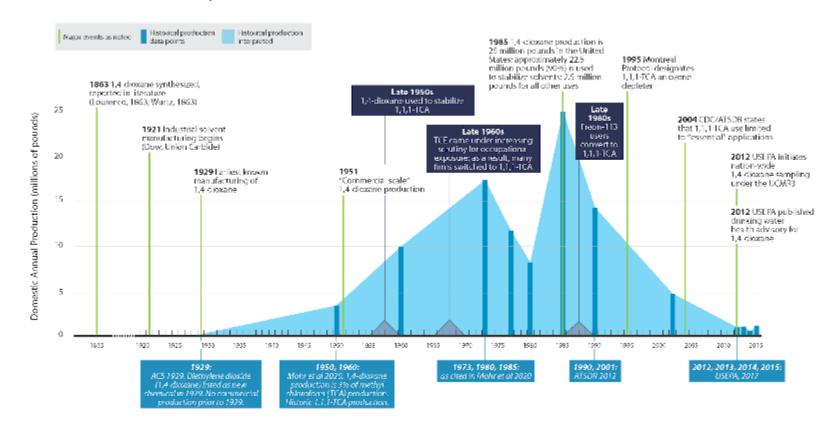


Production History

Discussed in time segments:

- ► Synthesis through 1973
- **▶** 1973-1990
- ▶ Post 1990

1,4-DIOXANE TIMELINE AND HISTORICAL PRODUCTION

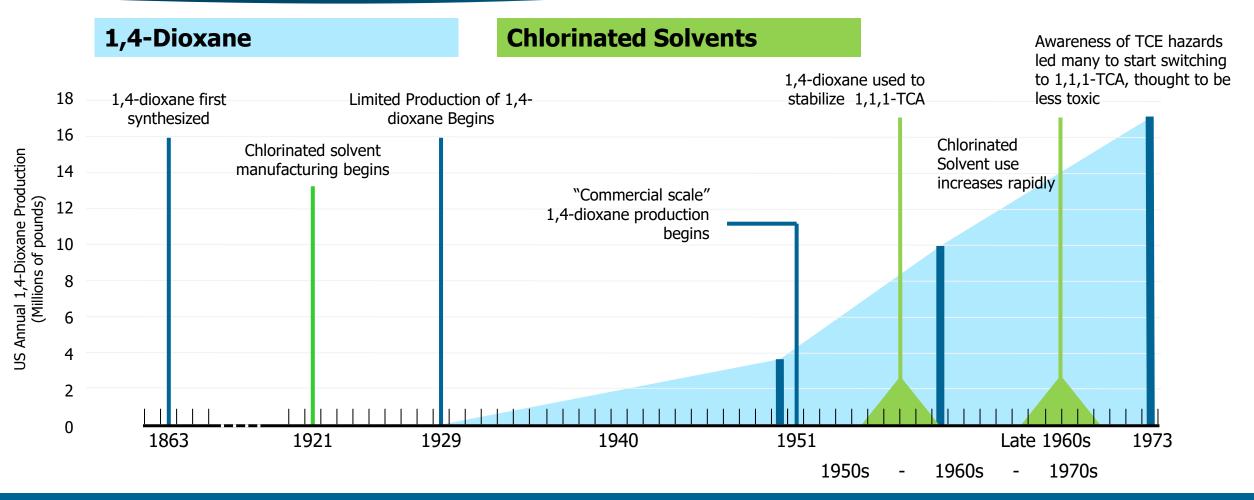








Invention, Discovery and Growth (1863 – 1973)



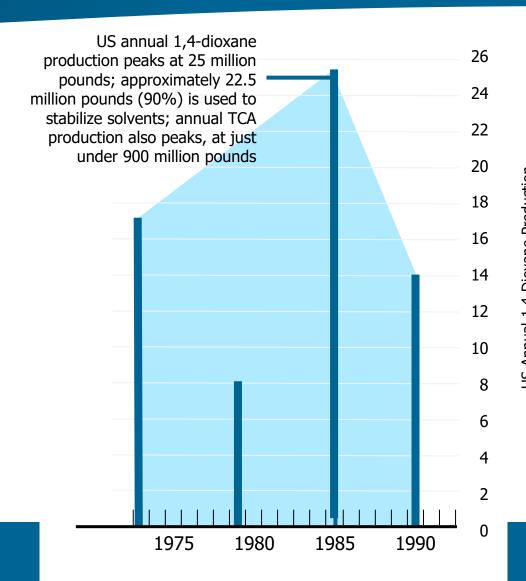






1973-1990

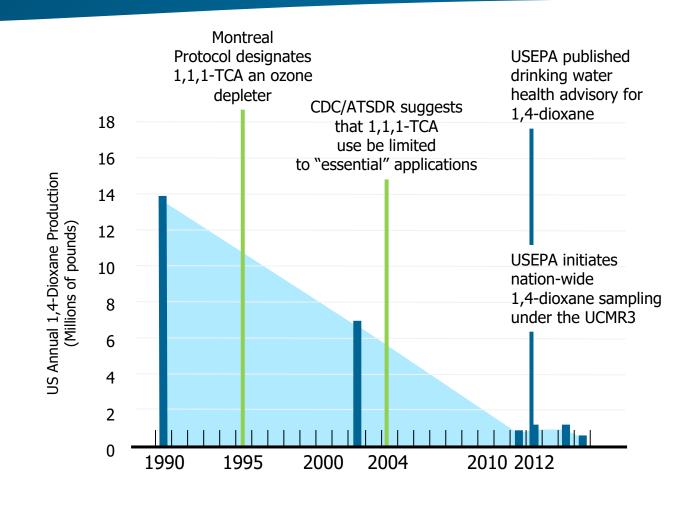
- ▶ Limited data available
- ► Shows variability over time (may be an artifact of data)
- ➤ Overall decline from early 1970s to 1990s due to industry reducing solvent usage overall
- ▶ 1985 data point valuable in that 90% of 1,4-dioxane in the United States was used for solvent stabilizing





Post-1990

- ▶ Decline from 1990 from overall decline in chlorinated solvent usage in US and abroad
- ▶ 1995 Montreal Protocol designates 1,1,1-TCA as ozone depleting, driving widespread phase out
- ▶ By 2012, production falls to less than 1 million pounds/year









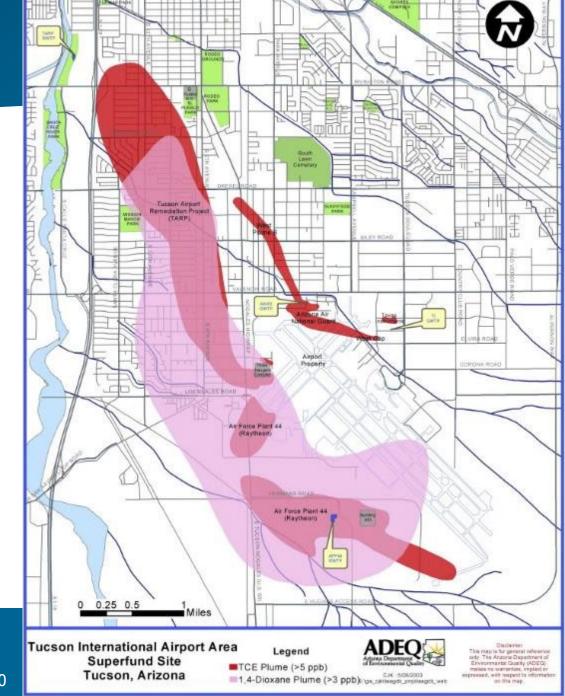
History of Use Case Study – Air Force Plant 44 (AFP44)

- ► Missile Manufacturing Plant in Tucson, Arizona
- ► Used TCE from 1950s present (minor uses)
- ▶ Dominantly switched to 1,1,1-TCA from 1974 through the early 1980s
- ➤ Site 3 Operated 1966 1977, disposed vapor degreaser solvent waste in unlined lagoons
- ➤ Site 5 Operated early 1960s until 1977, disposed wastewater and metal sludge from nearby plating shop with solvent degreasers
- ► Groundwater extraction and reinjection system operated 1987 present



AFP44 Plume Map

- ► 1,4-Dioxane plume confirms relationship with chlorinated solvents, specifically TCE
- ► AFP44 is one of several sources in the Tucson International Airport Area Superfund Site
- ► Main TCE plume disconnected by pump and treat activities since 1987
- ► 1,4-Dioxane plume wider at time of discovery, due to reinjection of treated (air stripper) water
- ► Plume has narrowed dramatically with elimination of reinjection on sides of the plume

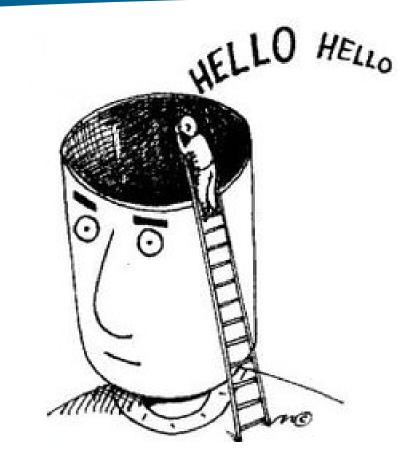






Takeaways

- ▶ 1,4-Dioxane is used in many industries, but primarily used in stabilizing 1,1,1-TCA
- ► 1,4-Dioxane manufacture over time is tied to 1,1,1-TCA manufacture and use
- ► May have been present in TCE but there's little direct evidence; there is, however an empirical association
- ▶ 1,4-Dioxane co-location with chlorinated solvents is common, at similar order of magnitude

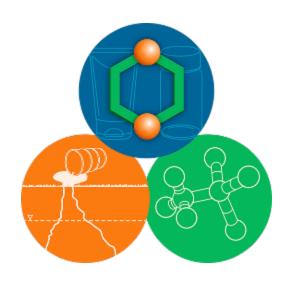


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Module 2: Regulatory Framework





Janet K. Anderson, PhD, DABT GSI Environmental Inc. Austin, TX 513-226-6528 jkanderson@gsienv.com



Learning Objectives

► Understand the primary state and U.S. federal regulatory programs of relevance to 1,4-dioxane

▶ Recognize the current U.S. regulatory and guidance values for 1,4-dioxane in groundwater, drinking water, soil, and air



Figure 2-1. 1,4-Dioxane State Regulatory Values for Drinking Water and Groundwater (μ g/L)

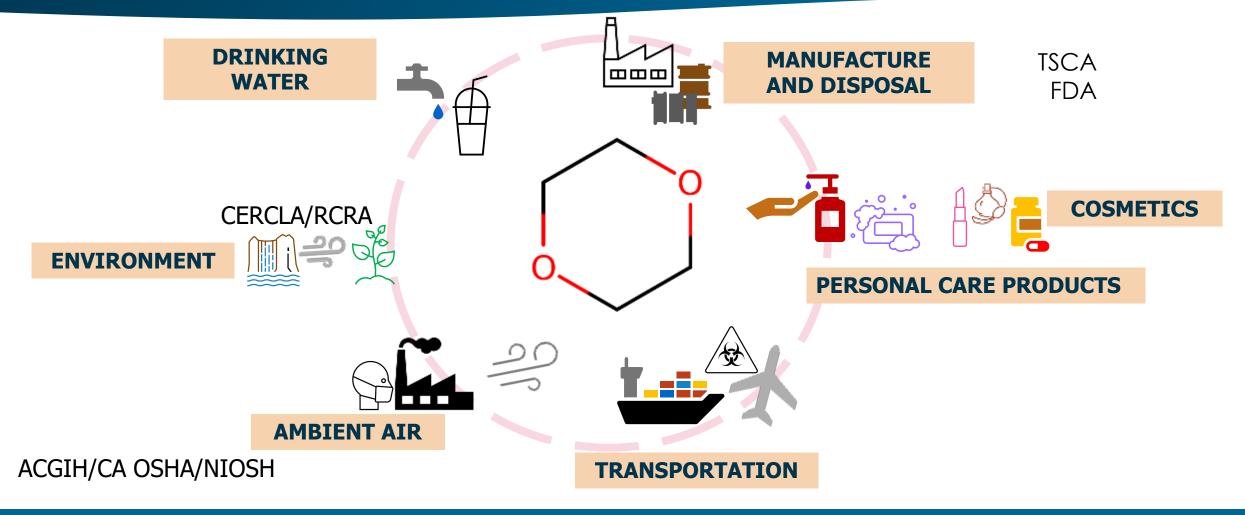
Data as of 2/3/2021







Regulatory Framework & Landscape







Manufacture (Import, Processing, Distribution, Use and Disposal)

U.S. EPA Toxic Substances Control Act (TSCA):

► Priority chemical - risk evaluation DRAFT issued June 2019



- ► Evaluation of risk to workers and occupational nonusers
 - ▶ During "industrial and commercial conditions of use such as manufacturing, processing, distribution, use, and disposal"
 - ► Excludes unintentional occurrence in consumer products





Manufacture (Import, Processing, Distribution, Use and Disposal)

U.S. EPA Toxic Substances Control Act (TSCA):

- ► FINALIZED Dec 31, 2020
- ► Includes Supplemental Risk Evaluations released NOVEMBER 2020
- ▶ New evaluation of risk to general public:
 - ▶ as a byproducts in consumer products
 - ► surface water exposure (swimming and fish consumption) via released from manufacturing plants
 - ► <u>Does NOT evaluate risk from drinking water exposure</u>









Manufacture (Import, Processing, Distribution, Use and Disposal)

U.S. EPA Toxic Substances Control Act (TSCA):

Final Conclusions

- No unreasonable risk to occupational non-users or to the environment
- No unreasonable risk to the general public from exposure to consumer products
- No unreasonable risk to the general public from dermal or incidental ingestion of surface water, or from fish consumption
- ► <u>Unreasonable risk</u> to workers in domestic manufacturing, processing, industrial use and disposal









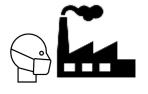


Current Occupational Standards – Air

- American Conference of Governmental Industrial Hygienists (ACGIH)
 - ▶ 20 ppm as an 8-hour threshold limit value
- California Occupational Safety and Health Administration (CA OSHA)
 - ▶ 0.28 ppm as an 8-hour time weighted average
- National Institute of Occupational Safety and Health Administration (NIOSH)
 - ▶ 1 ppm as a 30-minute ceiling recommended exposure limit for a lifetime
 - ▶ 500 ppm immediately dangerous to life and health



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Cosmetics and Pharmaceuticals

U.S. Food and Drug Administration (FDA)

- ► No limits in cosmetic products
 - ► Recommends maximum of 10,000 µg/L in product
- ► No limits in pharmaceuticals
 - ► Recommendation as Class 2 solvent that daily exposure should not exceed 3.8 mg/day









Personal Care Products

► Federal: NEW EPA TSCA conclusion of no unreasonable risks (Dec 2020)



- ► States: Product Labeling and Consumer Products Laws:
 - ► California Safe Drinking Water and Toxic Enforcement Act Prop 65
 - ▶ listed as a chemical known to cause cancer
 - requires manufacturers, distributors, and retailers to provide warning labels on products containing concentrations that would result in exposure >30 μg/day
 - ► California Cleaning Products Right to Know Act
 - ► requires that manufacturers disclose as an ingredient in cleaning products if present at or above 0.001% or 10,000 µg/L

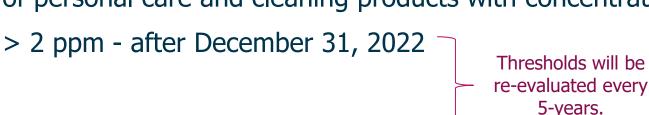




Personal Care Products - continued

- ► New York Cleaning and Personal Care Products
- ▶ Prohibits the sale of personal care and cleaning products with concentrations:

> 1 ppm - after December 31, 2023





- ▶ Oregon Toxic-Free Kids Act
- ► Vermont State's List of Chemicals of High Concern to Children
- ▶ Washington State's Children's Safe Products Law
 - ► Requires manufacturers to report if >1 ppm in a product





Surface Water

<u>U.S. EPA Office of Water – Clean Water Act:</u>

- ► No surface water quality criteria
 - ► EPA's Enforcement and Compliance History Online Database ("ECHO") lists numerous <u>National Pollutant Discharge Elimination</u> <u>System (NPDES) permits</u> with monitoring requirements for 1,4-dioxane

States:

- ► Surface water quality standards (e.g., Colorado and Michigan)
- ▶ Wastewater discharge requirements

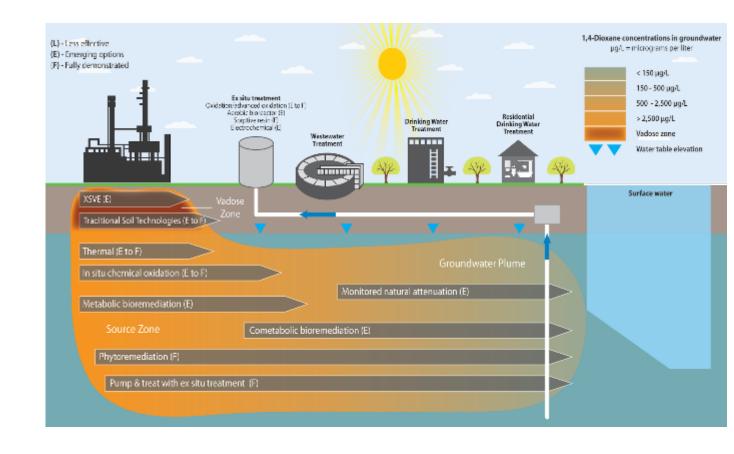






Environmental Cleanup Programs: Federal

- Hazardous Substance under CERCLA/RCRA
- ► CERCLA
 - screening levels* used for screening and informing cleanup goals
 - ► RSL** = 0.46 μ g/L groundwater
 - = 5.3 mg/kg soil
 - $= 0.56 \mu g/m3 (0.16 ppm) air$





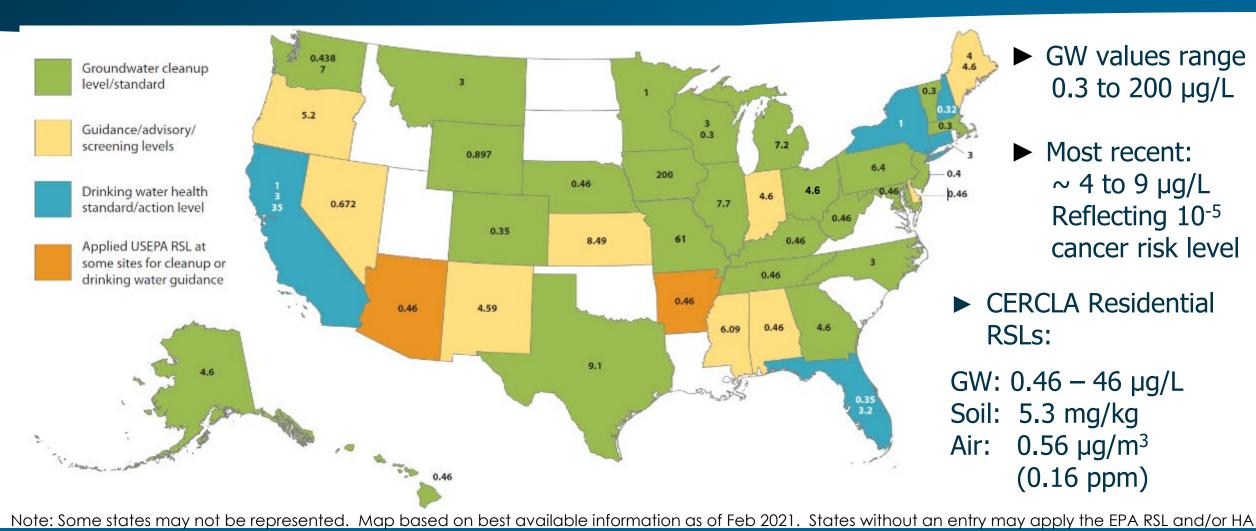




^{*}screening levels – not cleanup standards

** Regional Screening Levels (RSL) shown at 10-6
cancer risk level for residential exposure

Environmental Cleanup Programs









Drinking Water - Safe Drinking Water Act (SDWA)

<u>U.S. EPA Office of Water – Safe Drinking Water Act:</u>



- Standards for drinking water quality and monitoring requirements for <u>public water</u> <u>systems</u>
 - ► No maximum contaminant level (MCL)
- ▶ Identified as a chemical known to occur in public drinking water systems and may require regulation
 - ► Candidate Contaminant List (CCL) since 2008
- ► March 2021, EPA "has not determined whether there is a meaningful opportunity for public health risk reduction" (FRN, 86.40)
 - Continuing to evaluate for MCL





Drinking Water - Health Advisory - Guidance



2012 Edition of the Drinking Water Standards and Health Advisories



- ➤ Provide information for drinking water contaminants that can / are known to / anticipated to cause human health effects
- ► Issued when an enforceable drinking water standard has not been established
- Lifetime cancer risk level of **35 μg/L** (10-4 cancer risk)

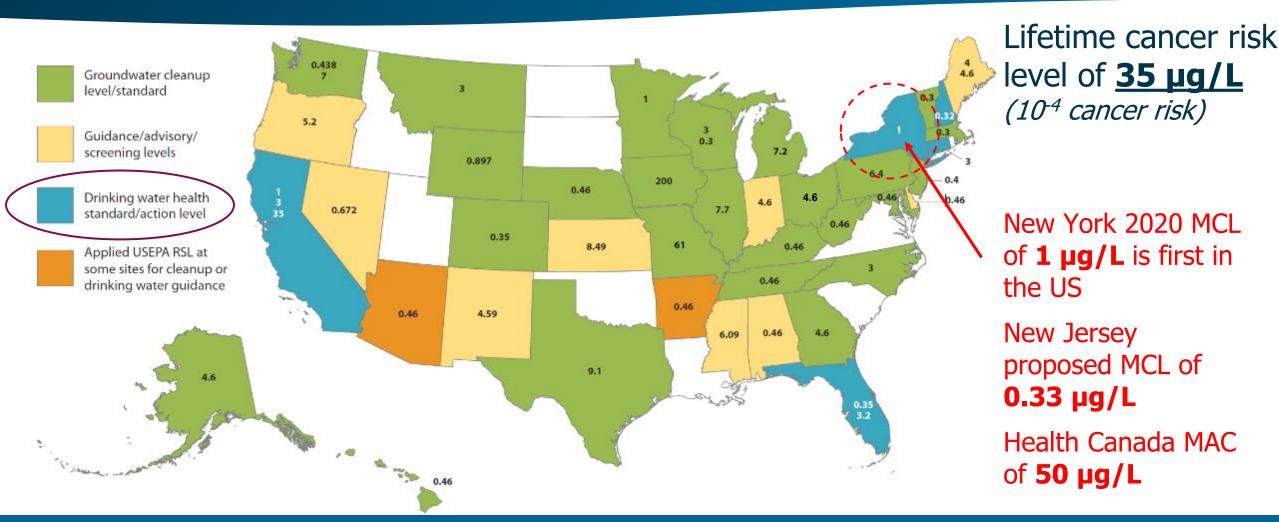








Drinking Water – HA & State Regulation

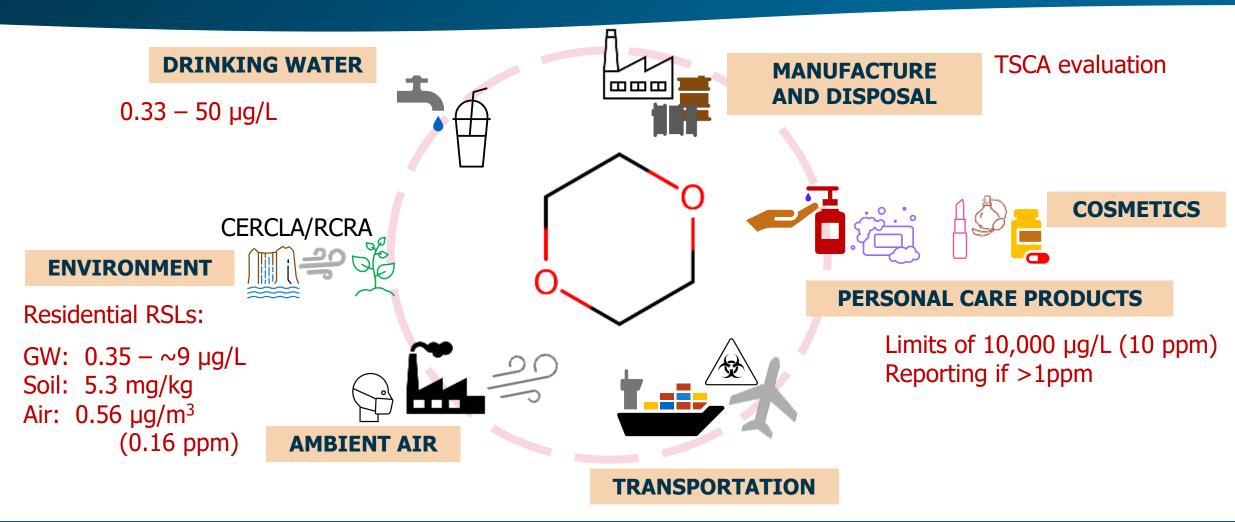








Regulatory Framework & Landscape - Conclusion









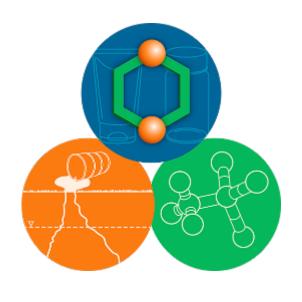
Module 3: Environmental Fate, Transport and Investigation Strategies



David Adamson, PhD, P.E. GSI Environmental Inc. Houston, Texas 713-522-6300 dtadamson@gsienv.com



Monica Heintz, PhD Arcadis Highlands Ranch, Colorado 303-471-3576 monica.heintz@arcadis.com







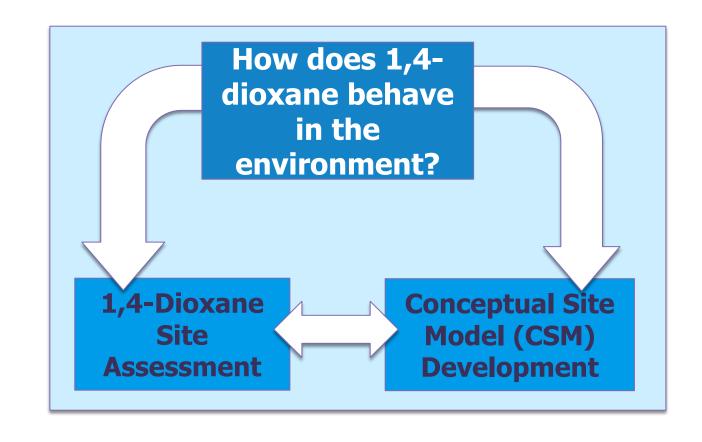
Learning Objectives

- ► Understand key physical/chemical properties
- ► Identify fate and transport processes that are relevant for 1,4-D
- ► Develop a general conceptual site model for 1,4-D
- ► Establish an informed site assessment strategy



Fate and Transport of 1,4-Dioxane – Why is this Important?

- ▶ Behavior in the environment helps us answer key questions about where to look for 1,4-dioxane, potential for risk, and how it might be treated
- ► Function of 1,4-dioxane's physicalchemical properties and site characteristics
- ► Still evolving!

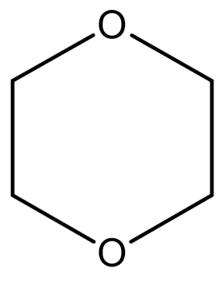






Fate and Transport of 1,4-Dioxane – Critical Characteristics

- ► Low organic carbon partitioning coefficient, so it does not bind strongly to soils and readily leaches to groundwater
- Miscible in water
- ► Common co-contaminant with chlorinated solvents
- ► Low Henry's constant relative to common cocontaminants
- Known degradation pathways involve oxidation



1,4-Dioxane



Fate and Transport of 1,4-Dioxane – Critical Characteristics

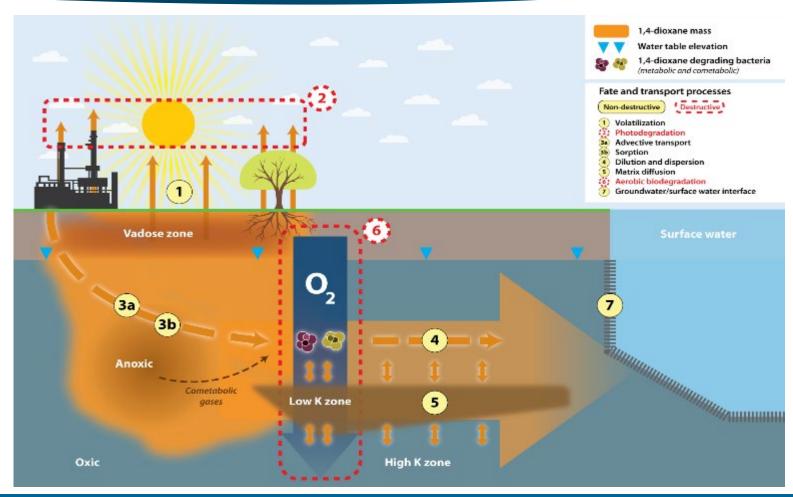
Property	Units	1,4-D	Benzene	TCE	1,1,1-TCA	1,1-DCA	1,1-DCE
Water solubility	g/L	1000	1.8	1.1	0.91	5.04	5.06
Vapor pressure	mm Hg (at 25°C)	23.8	95.2	72.6	124	227	234
Henry's Law constant	atm- m3/mol (at 25°C)	4.8 x 10 ⁻⁶	5.48 x 10 ⁻³	9.1 x 10 ⁻³	1.6 x 10 ⁻²	5.62 x 10 ⁻³	5.8 x 10 ⁻³
Log K _{oc}	Dimension-less	0.54	1.92	1.81	2.18	1.55	1.48
Boiling point	°C	101	80	87	74	57.4	32







Conceptual Site Model for 1,4-Dioxane



► Let's go through these processes individually

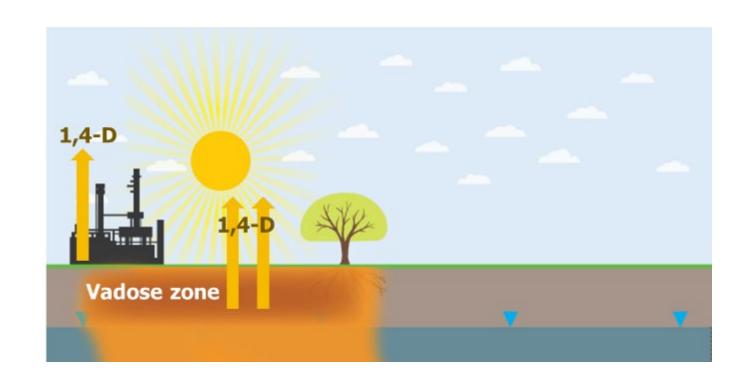






Volatilization

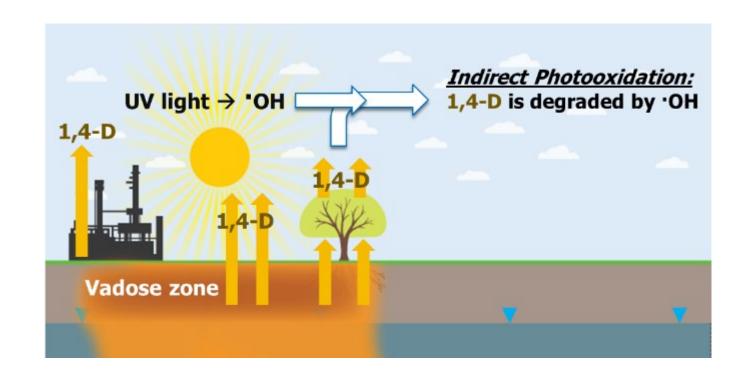
- ➤ Transfer from liquid phase to gas phase is primarily a concern for releases from dry surfaces or releases of pure phase (i.e., absence of water)
- Volatilization of 1,4-dioxane once dissolved in groundwater is limited due to low Henry's Law constant (several orders of magnitude lower than values for TCE and 1,1,1-TCA)
- ► Non-destructive process





Photodegradation

- Low organic carbon
- ▶ 1,4-dioxane is photodegradable once it is in the atmosphere – indirect photolysis via hydroxyl radicals
 - Destructive process
 - ► Half-life of a few hours to days
- Plant uptake has also been demonstrated
 - ► Leads to transfer from subsurface to atmosphere (where it is subject to photodegradation)



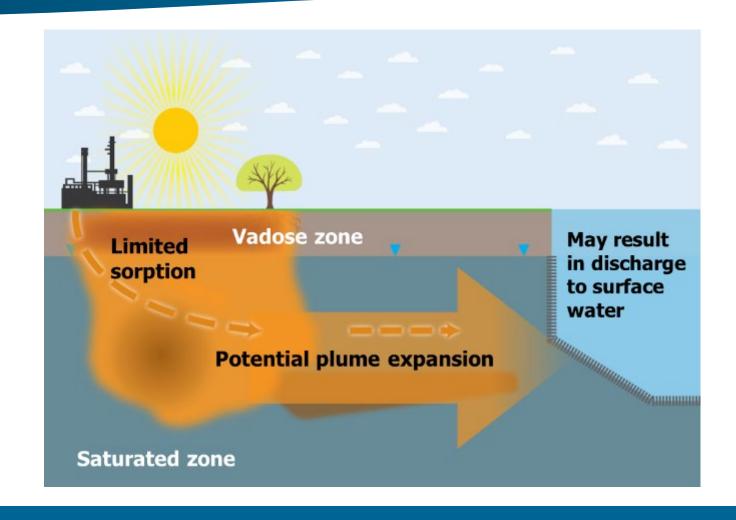






Advection-Dispersion-Dilution

- ► Low organic carbon
- Advection is a major concern due to limited capacity to sorb to aquifer solids
 - ► Non-destructive process
- Potential for migration at similar velocity as groundwater
- ► High solubility (essentially miscible), though dilution and dispersion may affect concentrations during groundwater transport







Advection Example: Hypothetical Release of Chlorinated Solvents and 1,4-Dioxane

▶ **Question:** How would 1,4-dioxane be expected to migrate in groundwater relative to other contaminants (e.g., chlorinated solvents) that may have been released?

► Key Considerations:

- (1) Physical-chemical characteristics of co-occurring contaminants
- (2) Hydrogeologic characteristics of aquifer
- (3) Timing of release(s)



Advection Example: Hypothetical Release of Chlorinated Solvents and 1,4-Dioxane



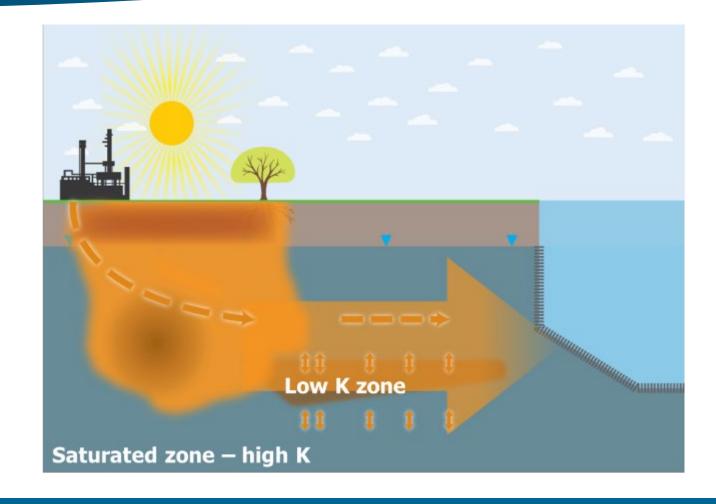






Matrix Diffusion

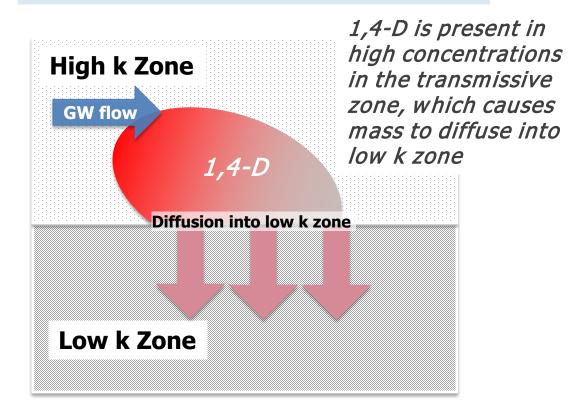
- ▶ Diffusion of dissolved 1,4dioxane mass into lowpermeability (low K) zones (e.g., clays, silts, rock) within or adjacent to aquifer
 - ► Non-destructive process
- Storage of mass w/in low K zones could contribute to persistence
- ► Poses additional challenges for remediation





Matrix Diffusion: Influences Over Time

EARLY STAGES (After Release)



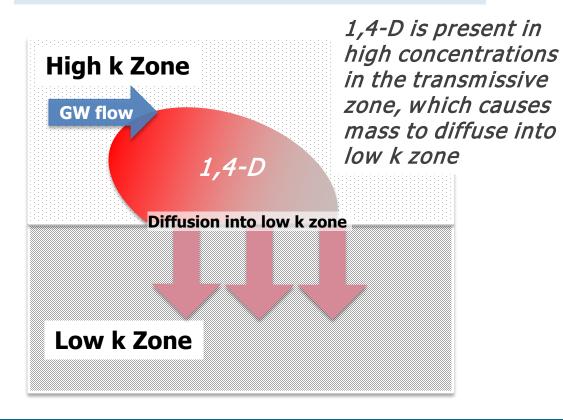




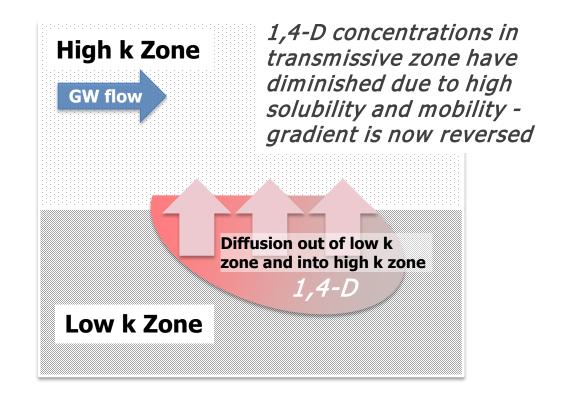


Matrix Diffusion: Influences Over Time

EARLY STAGES (After Release)



LATER STAGES (During Site Investigation)



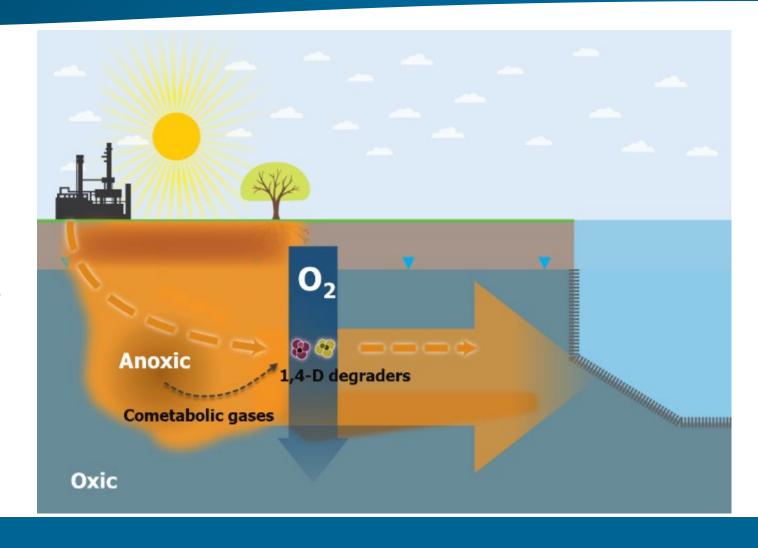






Biodegradation

- ► 1,4-dioxane previously not considered to be biodegradable
- Now understood that 1,4-dioxane can be biologically oxidized
 - ▶ Destructive process
- Several different microorganisms have been identified (and more are likely)
- Relies on availability of dissolved
 O₂ in groundwater
 - ► Very limited evidence for anaerobic pathway for 1,4-dioxane

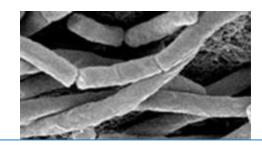






Biodegradation

- Metabolic and cometabolic biodegradation pathways have been identified
 - ► Metabolic: 1,4-dioxane used by microbes as source of carbon and energy
 - ➤ Cometabolic: 1,4-dioxane is degraded by enzymes that lack specificity. This is side effect of degradation of primary substrates



CB1190 - most widely studied degrader of 1,4-D via metabolic pathway

Primary substrates

THF isobutane

propane ethane toluene isopentane n-pentane n-butane

1,4-D

Cometabolic

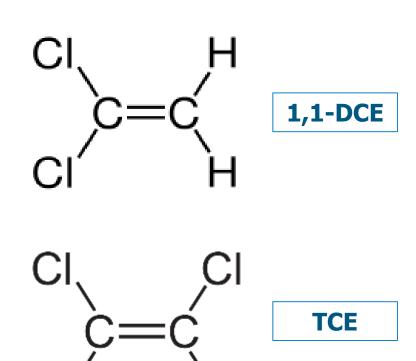
target





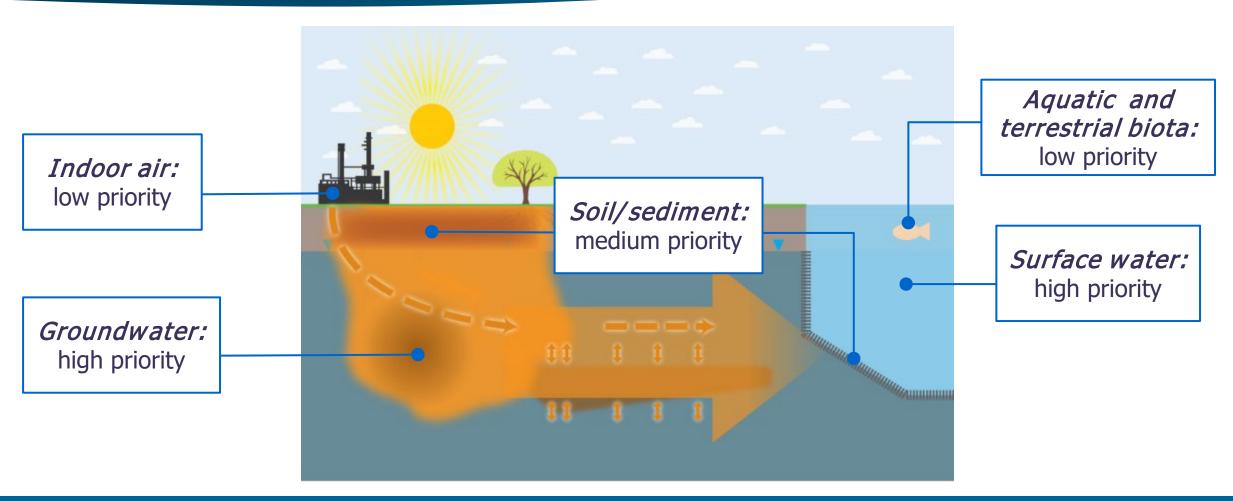
Biodegradation

- ► Inhibition is a potential concern for both types of 1,4-dioxane biodegradation processes
 - ► co-occurring chlorinated solvents (e.g., 1,1-DCE, TCE)
 - ▶ some metals (e.g., Cu⁺²)





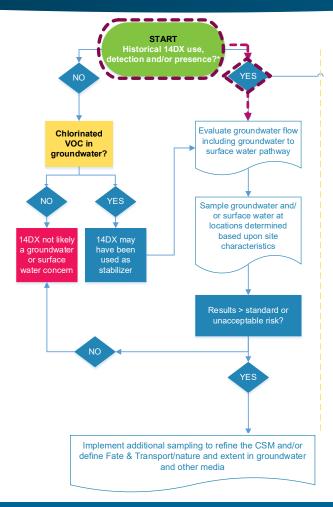
What Media Are Likely To Be Important?











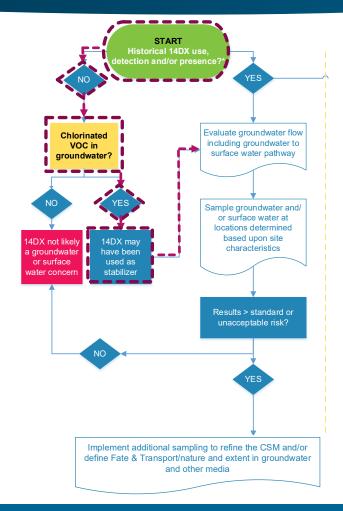
PRIORITIES:

 Sites where historical 1,4-dioxane use has been established and/or 1,4dioxane has been detected









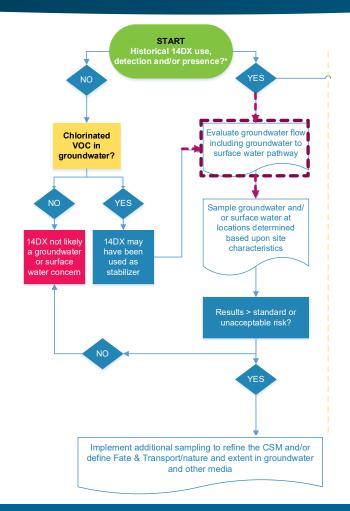
PRIORITIES:

- Sites where historical 1,4-dioxane use has been established and/or 1,4dioxane has been detected
- Site with chlorinated solvents









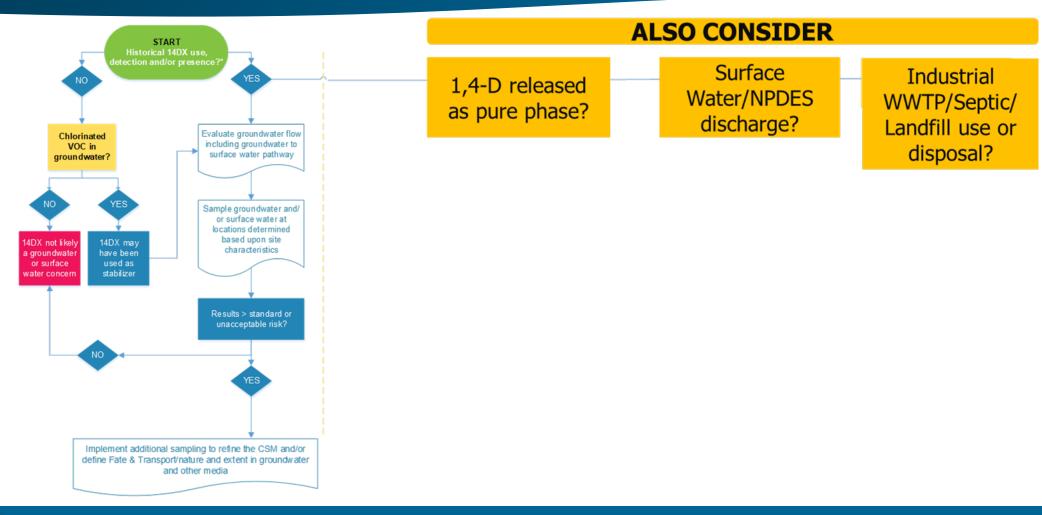
PRIORITIES:

- Sites where historical 1,4-dioxane use has been established and/or 1,4dioxane has been detected
- Site with chlorinated solvents
- Groundwater first, but evaluate possible discharge to surface water (if applicable)





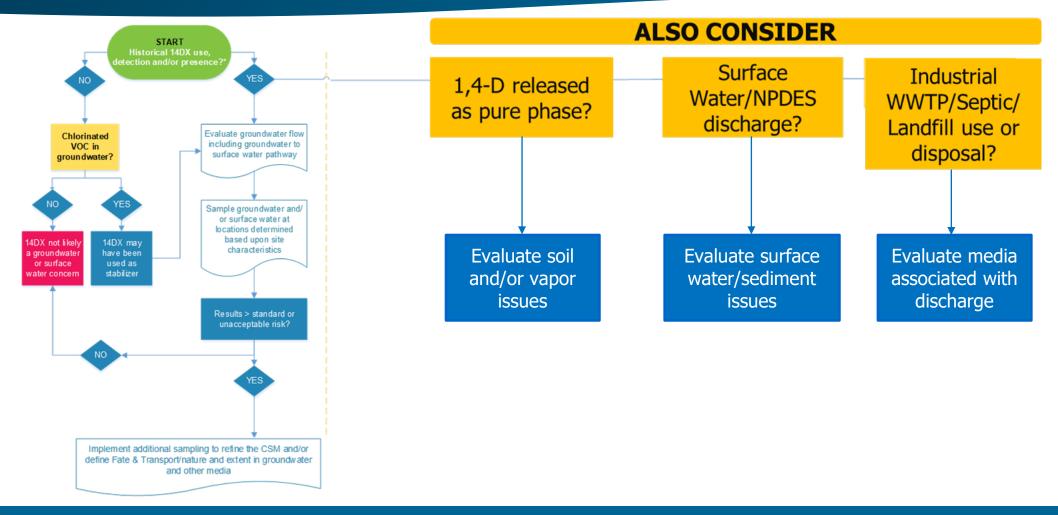
















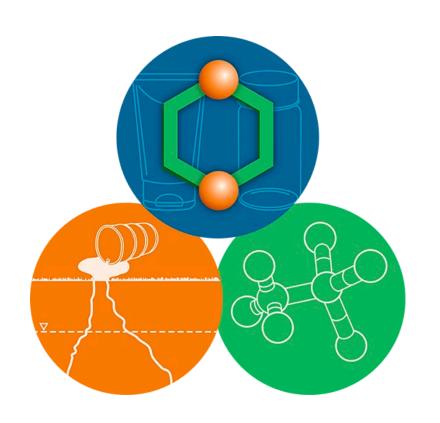


Take Home Messages

- ► Understand key physical/chemical properties
 - ► Low organic carbon partitioning coefficient and Henry's constant; high solubility
- ▶ Identify fate and transport processes that are relevant for 1,4-dioxane
 - ► Advection with limited sorption in subsurface
 - ► Photodegradation in atmosphere; biodegradation in water is possible but requires oxygen
- ▶ Develop a general conceptual site model for 1,4-dioxane
 - ► Must reflect site-specific conditions (e.g., low permeability zones in aquifer may promote matrix diffusion)
- Establish an informed site assessment strategy
 - ► Existing characterization data for chlorinated solvents can help guide, but recognize potential differences for 1,4-dioxane
 - ► Decisions about sampling other media if dictated by site-specific considerations, including potential sources, release histories, and hydrogeologic setting







Question Break







Module 4: Sampling & Analysis



Elizabeth Denly
TRC
Lowell, Massachusetts
978-656-3577
Edenly@trccompanies.com







Learning Objectives

- ► Highlight potential sampling precautions
- Explain different holding times, containers, and preservation techniques
- ► Identify the common analytical methods available for 1,4-dioxane in different matrices, with a focus on water
- Understand the benefits and limitations of the available analytical methods





Sampling Precautions

- ► Groundwater Precautions
- ► Soil Precautions
- **▶** Decontamination







Sampling Precautions - Groundwater

- ► Conventional Sampling acceptable; however, if passive diffusion sampling performed ...
 - ► Low density polyethylene membrane in standard PDB: NOT suitable for 1,4-Dioxane
 - ▶ Need to use different membrane materials or pore sizes that facilitate diffusion of 1,4-Dioxane into the sampler.

Hydrasleeve
ITRC
Technology
Overview of
Passive Sampler
Technologies,
March 2006



- ► Rigid Porous Polyethylene (RPP) sampler
- ▶ Dual Membrane PDB (DMPDB) sampler
- ▶ Snap Sampler®
- ► HydraSleeve[™]

► Low yield wells



Left: RPP Sampler; Right: Snap Sampler ITRC Technology Overview of Passive Sampler Technologies, March 2006







Sampling Precautions - Soil

- ► Conventional sampling acceptable; however, if samples have very low moisture content
 - ► Very dry (desert) climate
 - ► Local dry microclimate (e.g., under building)



The Terra Core® Sampler

Source: www.ennovativetech.com

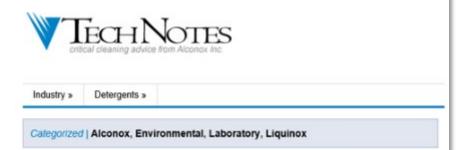
Expect more volatilization: use VOC soil collection method





Sampling Precautions – Equipment Decontamination

- ► 1,4-Dioxane common impurity in detergents
- Need to prevent detergents from remaining on equipment
- ▶ Use of disposable equipment or passive samplers eliminates need for decontamination



Does Alconox or Liquinox contain 1,4-Dioxane?

Posted on 07 March 2014, Tags: 1-4 Dioxane

Q. Does Alconox or Liquinox contain 1,4-Dioxane?

A. Nonionic Liquinox likely contains extremely trace levels 1,4-Dioxane, but anionic Alconox is very unlikely to contain 1-4 dioxane. Sometimes people inadvertently refer to Liquinox as Alconox because it is made by Alconox, inc.

Liquinox is a nonionic detergent and does contain extreme trace levels of 1,4-Dioxane. In general most detergents with nonionic surfactant ingredients will have trace 1,4 Dioxane as a trace impurity from the ethylene oxide condensed polymers that are part of most nonionic aurfactants.



The trace contaminant 1,4-Dioxane is found in nonionic detergents. Most nonionic surfactants are derived from alkyl groups with condensed polymers of ethylene oxide attached. The ethylene oxide polymerization process during the manufacture of the nonionic surfactant results in traces of 1,4-Dioxane being formed.

The trace contaminant 1-4 dioxane is volatile. The concentration will diminish with time. In Liquinox the concentration would be well below tens or hundreds of ug/L. The residue potential in a detergent used at a 1% dilution that is thoroughly rinsed would be well below single digit nanograms/L in sampling equipment; very thorough rinsing can reduce that to tenths or hundredths of nanograms/L. Labs should do equipment blanks to assure that thorough rinsing has been done whenever any nonionic detergent such as Liquinox is used.

To ask another Technical Cleaning question from our experts please visit Ask Alconox at www.alconox.com. You can also find Liquinox and Alconox detergent technical bulletins and MSDSs.







Holding Times, Containers, & Preservation

Dependent on analytica method and matrix

	Matrix	Method	Container	Preservation	Holding Time
al d	Aguagus	SW-846 8260	3 40-mL VOA vials	HCl to pH <2; Cool 0-6°C	14 days to analysis
	Aqueous	SW-846 8270	2 1-L amber glass	Cool 0-6°C	7 days to extraction; 40 days from extraction to analysis
	Solid	SW-846 8260	3 40-mL VOA vials or 3 EnCore™ samplers	Vials: low-level (water) and high-level (MeOH) Cool 0-6°C	Low-level: 48 hours to freezer; 14 days to analysis High-level: 14 days to analysis EnCore™ samplers: 48 hours to preservation; 14 days to analysis
		SW-846 8270	1 4-oz glass jar	Cool 0-6°C	14 days to extraction; 40 days from extraction to analysis
	Air	EPA TO-15	1 canister	None	30 days to analysis
		EPA TO-17	2 sorbent tubes	Cool <4°C	30 days to analysis







VOC or SVOC: Why Does it Matter?

- ► VOC or SVOC Methods
- ► Modifications needed to typical VOC or SVOC methods
- ▶ Dependent upon required sensitivity
- ▶ Dependent upon other contaminants of concern in sample
- ▶ Regulatory agency requirements/certification





Analytical Methods

Method	Technique	RLs	Comments	
	Ambient P&T with full scan GC/MS	200-500 μg/L	1,4-dioxane-d8 IS	
8260 (VOC): Aqueous	Heated P&T with SIM GC/MS	2-5 μg/L	1,4-dioxane-d8 IS Prone to interferences	
	Full scan GC/MS	5-10 μg/L	Poor extraction efficiency	
8270 (SVOC): Aqueous	Isotope dilution with SIM GC/MS	0.15-0.4 μg/L	1,4-dioxane-d8 IS Improved precision & accuracy	
	Ambient P&T with full scan GC/MS	0.2-0.5 mg/kg	1,4-dioxane-d8 IS	
8260 (VOC): Solid	Heated P&T with SIM GC/MS	0.002-0.005 mg/kg	1,4-dioxane-d8 IS Not routinely needed	
	Full scan GC/MS	0.05-0.2 mg/kg	Poor extraction efficiency	
8270 (SVOC): Solid	Isotope dilution with SIM GC/MS	0.00067 mg/kg	1,4-dioxane-d8 IS Improved precision & accuracy	
522: Drinking Water	SIM GC/MS	0.05-0.1 μg/L	Solid phase extraction	
TO-15 (Air)	Full scan GC/MS	0.7-1.0 μg/m ³		
TO-17 (Air)	Full scan GC/MS	1.1-11 ng/tube		







What to Know About Methods

- ► Use of 1,4-dioxane-d8 as internal standard: why critical?
- ► Why is 8260 analysis more prone to interferences?
- ► Why does isotope dilution improve precision & accuracy of results?

Sample spiked with KNOWN amount of isotope (1,4-dioxane-d8)

1,4-dioxane result corrected by proportional amount based on isotope

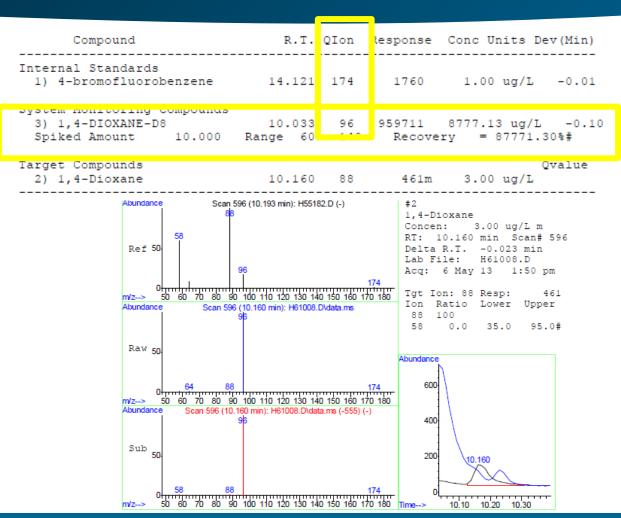
BENEFITS:

- Corrects for analytical error associated with matrix
- Corrects for matrix interferences





1,4-Dioxane 8260/SIM: Surrogate Recovery



	Concentration in sample	Primary Qions
Cis-1,2- Dichloroethene	665 μg/L	61, 96
Trichloroethene	8,290 µg/L	95, 96
1,4-Dioxane-d8	10 μg/L	96

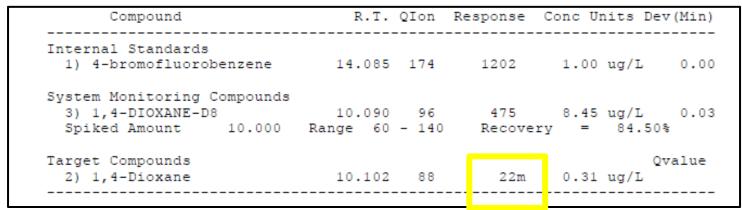
8260/SIM not as reliable when elevated levels of chlorinated VOCs present.







1,4-Dioxane 8260/SIM: 0.2 ug/L standard

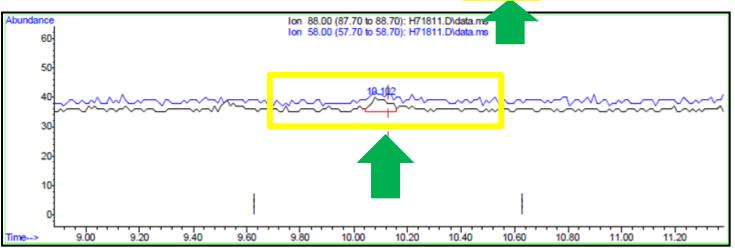


Primary quantitation ion:

m/z 88

Secondary ion:

m/z 58 (~60% of m/z 88)



8260/SIM not as reliable at RLs below 5 μ g/L due to extremely poor response (area counts) at lower concentrations







Method Average Costs SW-846 8260C (full scan) \$100 SW-846 8260C (SIM) \$50-100 SW-846 8270D (full scan) \$100-200

SW-846 8270D (SIM)

\$150



EPA 522



\$100-200

Depends on other contaminants present at your site and project objectives

If elevated concentrations of VOCs ($> 200 \mu g/L$), use one of the 8270 methods because 8260 won't work well

- If VOCs >200 µg/L, lab will need to perform dilution on 8260 SIM analysis to prevent contamination/saturation of trap during analysis
- If CVOCs >200 µg/L, same issue plus significant interference with 1,4-dioxane surrogate (1,4dioxane-d8) with cis-1,2dichloroethene (same quantitation ion)

Which
Analytical
Method Should
I Use?

Depends on how low your reporting limits need to be

 8270 with SIM more sensitive than 8260 with SIM

Safe to use 8270 with SIM and isotope dilution

Does require larger sampling volume

Check with the regulatory agency

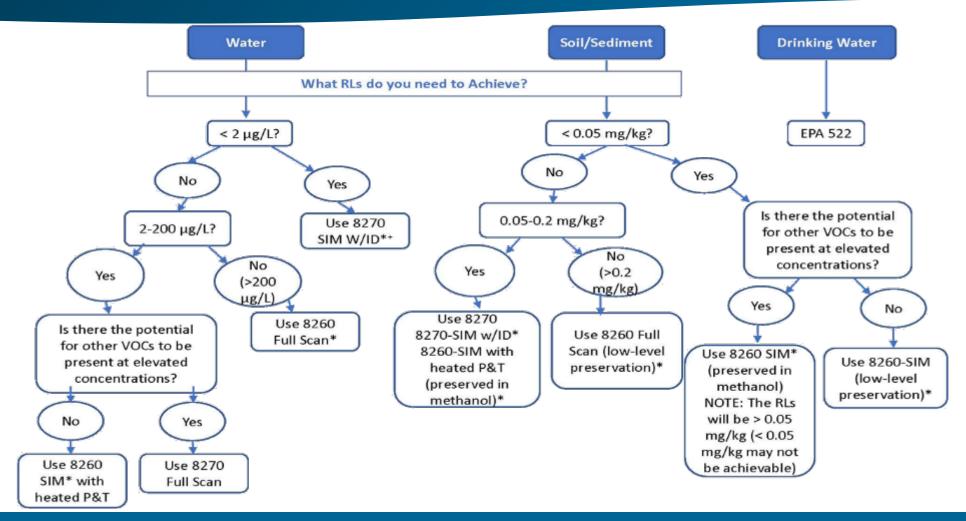
NYSDEC preferred method: 8270 with SIM







Figure 4-2 in Tech Reg: Flow Chart for Selecting Method for 1,4-Dioxane









Knowledge Check

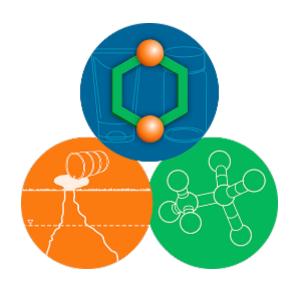
You are sampling groundwater for 1,4-dioxane and need to meet the regulatory screening criteria of 0.3 ug/L. Prior rounds of sampling detected elevated concentrations of some chlorinated VOCs (e.g., cis-1,2-dichloroethene). Which analytical method will you likely need to use, in the absence of any regulatory requirement?

- A. SW-846 8260 (VOC) with SIM
- B. SW-846 8260 (VOC) without SIM
- C. SW-846 8270 (SVOC) with SIM/isotope dilution





Module 5: Toxicity and Risk Assessment





Janet K. Anderson, PhD, DABT GSI Environmental Inc. Austin, TX 513-226-6528 jkanderson@gsienv.com





Learning Objectives

▶ Understand the risk drivers for human health and how ecological risk compares

► Become aware of the evolving science on how 1,4-dioxane causes cancer and how that impacts risk assessment decisions

► Risk Communication toolkit application to 1,4-dioxane



1,4-Dioxane - Toxicity and Risk Assessment Human Health



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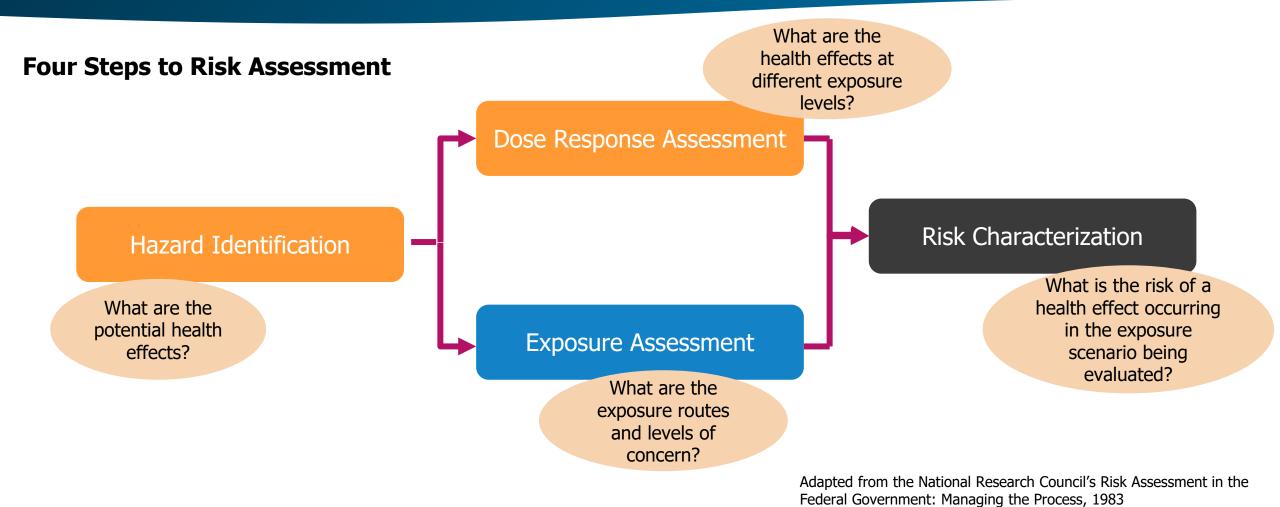






Human Health











Human Health – Hazard ID and Dose Response









Human Health – Hazard Identification



What are the potential health effects?

Hazard Identification



► Non cancer effects

► Oral: Liver and kidney

► Inhalation: Eye and respiratory

▶ Cancer

- "possibly carcinogenic" (IARC)
- ▶ "likely to be carcinogenic" (EPA)

Graphic art purchased from Shutter Stock







Cancer Risk/Toxicity Values Depend on MOA



- ► Rodent tumors
 - ► Liver, kidney, nasal, peritoneum, mammary gland...
- ► Generally, will be risk driver for human health
- ► HOWEVER, experts have different interpretations on cancer risk
 - ► Cancer Mode of Action (MOA)
 - **►** USEPA
 - ► Health Canada (and others)

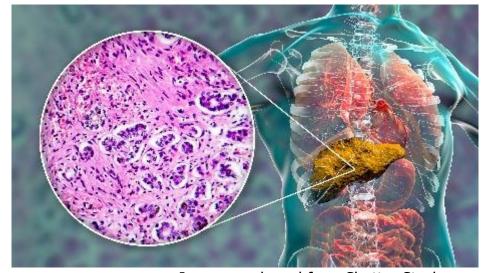


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USEPA = MOA is Unknown



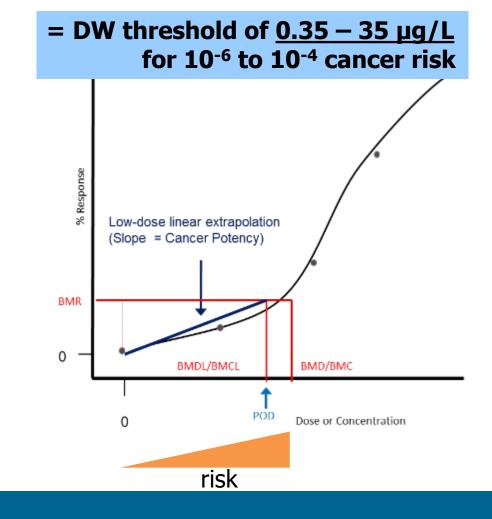
▶ 2 USEPA Assessments

- ▶ 2013 Integrated Risk Information System (IRIS)
- ► 2020 Toxic Substances Control Act (TSCA)

► Mode of Action conclusions

"The available evidence is inadequate to establish a mode of action (MOA) by which 1,4-dioxane induces liver tumors in rats and mice."

Default dose response model = any increase in exposure, increases risk









Health Canada = MOA is Non-Genotoxic and Threshold

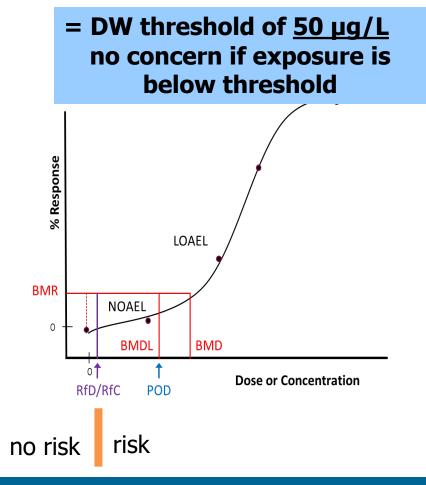


Health Canada 2018 Mode of Action conclusions

"Using a MOA analysis, the weight of evidence supports a nongenotoxic MOA, with 1,4-dioxane inducing liver tumours through a regenerative proliferation-induced MOA."

- and is reasonable for other human-relevant tumor types
- also adopted by WHO and other international agencies
- and supported by recent publications

Threshold MOA = there is only risk above a certain threshold level of exposure







Use of Best Professional Judgement Hierarchy of Toxicity Values



Tier 1



EPA Integrated Risk Information System (IRIS)

Tier 2



EPA Peer-Reviewed Provisional Toxicity Values (PPRTV)

Tier 3

Agency for Toxic Substances and Disease Registry Other EPA offices (e.g., Office of Water)

States, International Agencies, etc.

CONSIDERATIONS

- State-of-science methods, consistent with EPA
- ☑ Transparent
- ☑ Best available information
- ☑ Peer-reviewed







Human Health – Cancer Risk/Toxicity Values Summary



- ► Choice of cancer toxicity value has a significant impact of drinking water/ groundwater screening level
 - ightharpoonup ~ 0.33 to 50 µg/L (part per billion)
- ▶ Risk assessors should pay attention to the latest science and regulatory determinations
 - ▶ On-going research from academia, industry, etc. watch for new science!
- Professional judgement on best toxicity value for human health risk assessment





Human Health – Exposure



Exposure Assessment

What are the exposure routes and levels of concern?

- ► Why estimate exposure?
 - ► Estimate the intake (dose) of the chemical for each exposure route
- ► Involves characterizing the:
 - ► Exposure setting,
 - ► Relevant exposure pathways, and
 - Magnitude, frequency, and duration of potential exposure
- ▶ Will be site specific

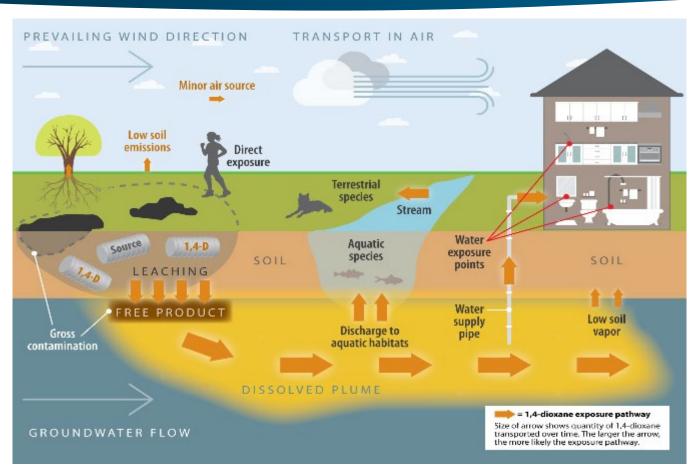






Human Health – Exposure Routes





- Drinking water ingestion primary concern
- Not likely to remain in surface soil
- Low dermal absorption
- Unlikely to volatilize out of water

Consider Site Assessment guidance from Fate and Transport Section

ITRC Guidance Document Figure 5.1







Risk Characterization and Sources of Uncertainty-Variability



- ▶ Describe the areas of uncertainty and variability within:
 - ► Toxicity evaluation
 - Derivation of toxicity value(s)
 - ► Exposure assumptions

► Important uncertainty = the cancer mode of action and quantitative impact it has on the risk assessment



Ecological



Graphic art purchased from Shutter Stock







Ecological – Hazard Identification



Hazard Identification

What are the potential health effects?

- Generally, not very toxic to ecological receptors
- ► Fish are the most sensitive aquatic receptors
- ► In mammals, effects likely only at high levels (in the 100s to 1000s mg/L)
- ► Generally, not toxic to plants; can be taken up from roots, but then volatilizes from foliage



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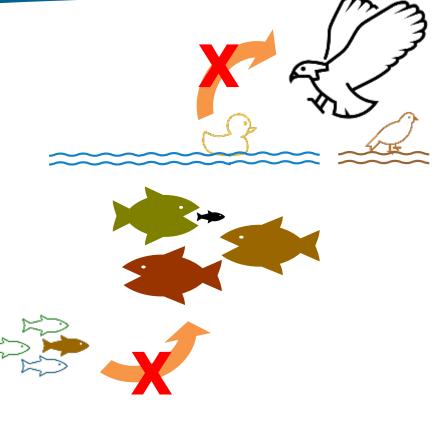




1,4-Dioxane Does Not Bioconcentrate



- ► 1,4-Dioxane does not bioaccumulate or bioconcentrate
- ► Trophic-level secondary poisoning is not expected







Ecological Screening Levels



Medium	Concentration	Type/Media	Reference
Surface Water (freshwater)	15 mg/L	Chronic COC	EPA 2018
	57.5 mg/L	PNEC-water	ECB 2002
	10 mg/L	PNEC-water	ECHA 2014
	201 mg/L	ChV-algae	EPA 2019
Sediment	43.3 mg/kg (ww)	PNEC-sed	ECB 2002
	37 mg/kg (dw)	PNEC-sed	ECHA 2014
Soil	14 mg/kg	PNEC-soil	ECB 2002





Ecological Exposure Assessment

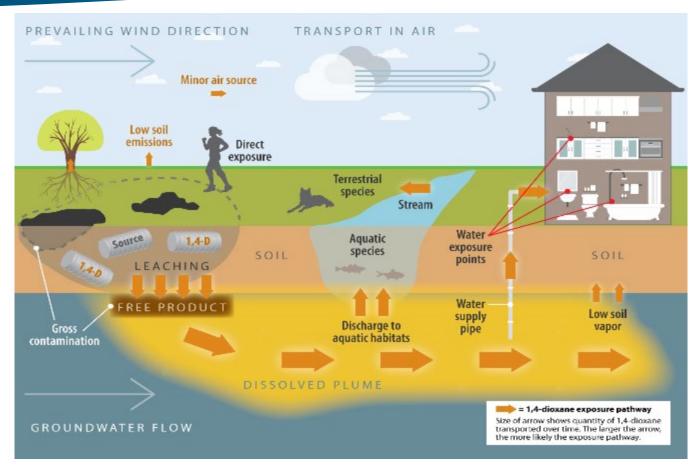


Exposure Assessment

What are the exposure routes and levels of concern?

Primarily through ingestion and direct contact pathways

Most likely through aquatic routes



ITRC Guidance Document Figure 5.1







Ecological Risk Characterization



Risk Characterization



What is the risk of a health effect occurring in the exposure scenario being evaluated? ► Generally, will only require screening level risk assessment to determine if ecological risk is likely





1,4-Dioxane - Risk Communication

- ► Purpose:
 - ► Assist in understanding risk assessment
 - ► Assist in forming perceptions of the potential hazards
 - ► Assist in making decisions about risk management
- ► Can be difficult for emerging contaminants, like 1,4-dioxane, with evolving scientific data









1,4-Dioxane - Toxicity and Risk Assessment Conclusions







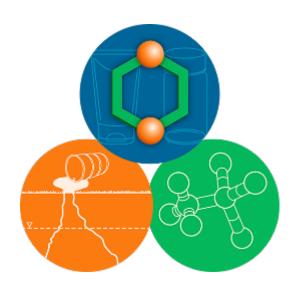
► Cancer risk is the primary concern for human health and longterm exposures



- ► Science is still evolving regarding how 1,4-dioxane causes cancer
- Selected toxicity value(s) should be consistent with established guidance and policies, well justified
- ► Uncertainties and limitations fully communicated



Module 6: Remediation & Treatment Technologies





Caitlin Bell, PE Arcadis U.S., Inc. Seattle, WA 415-432-6944 caitlin.bell@arcadis.com



Ted Tyler Stantec GS Mesa, AZ 480-688-7647 ted.tyler@cardno-gs.com





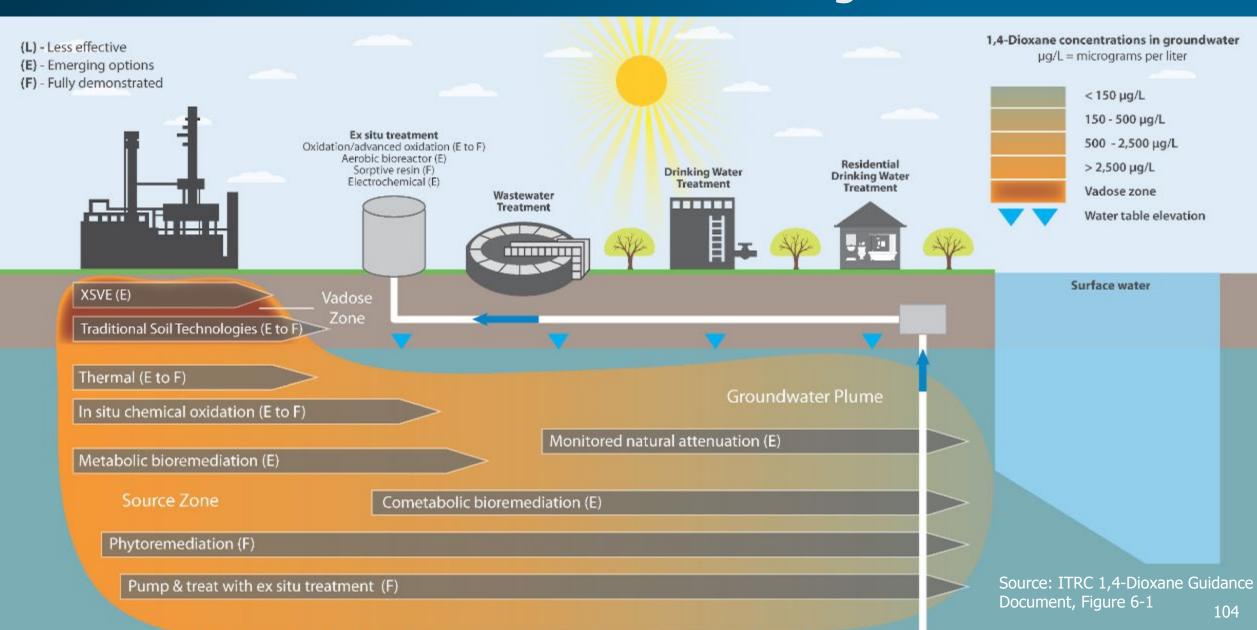
Learning Objectives

- ► Understand how/when/why different treatment technologies are appropriate
- ► Recall various soil, groundwater, drinking water, and wastewater treatment technologies for 1,4-dioxane

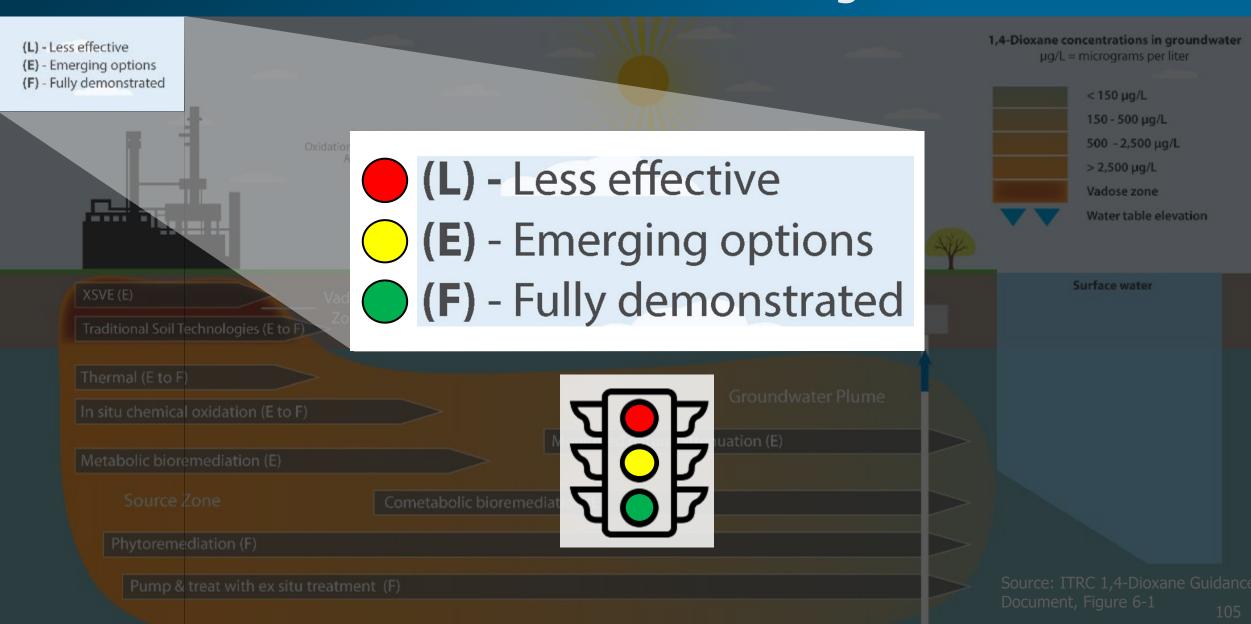
- ► Appreciate the design considerations for well-established treatment technologies
- ► Identify when certain technologies aren't appropriate for 1,4-dioxane treatment



Remediation and Treatment Technologies

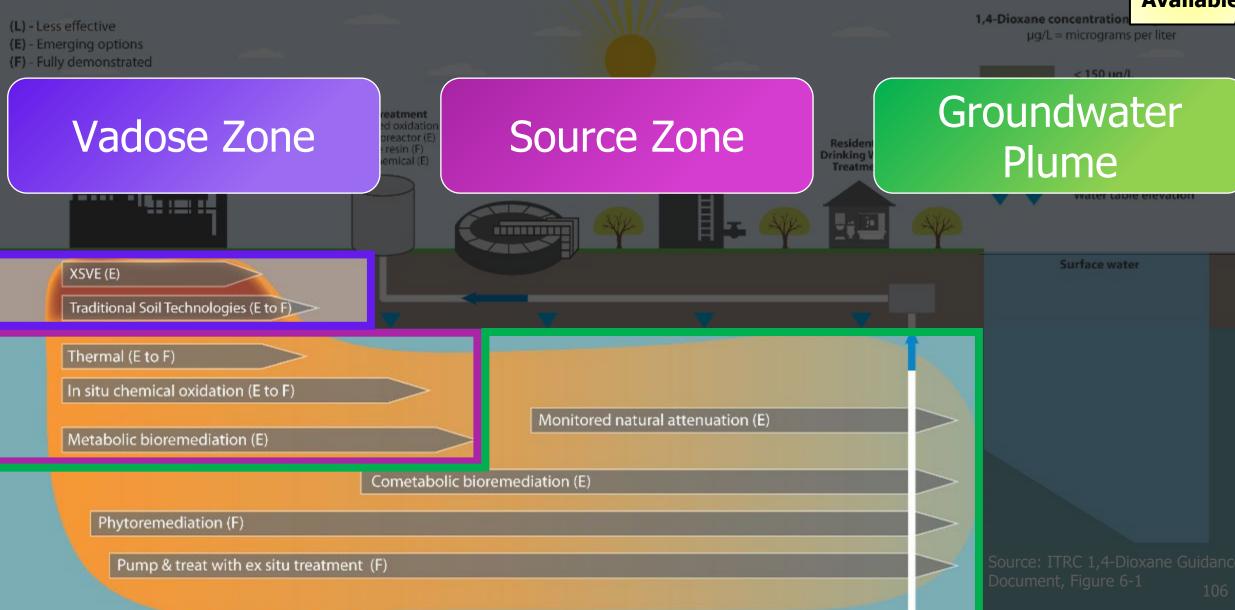


Remediation and Treatment Technologies

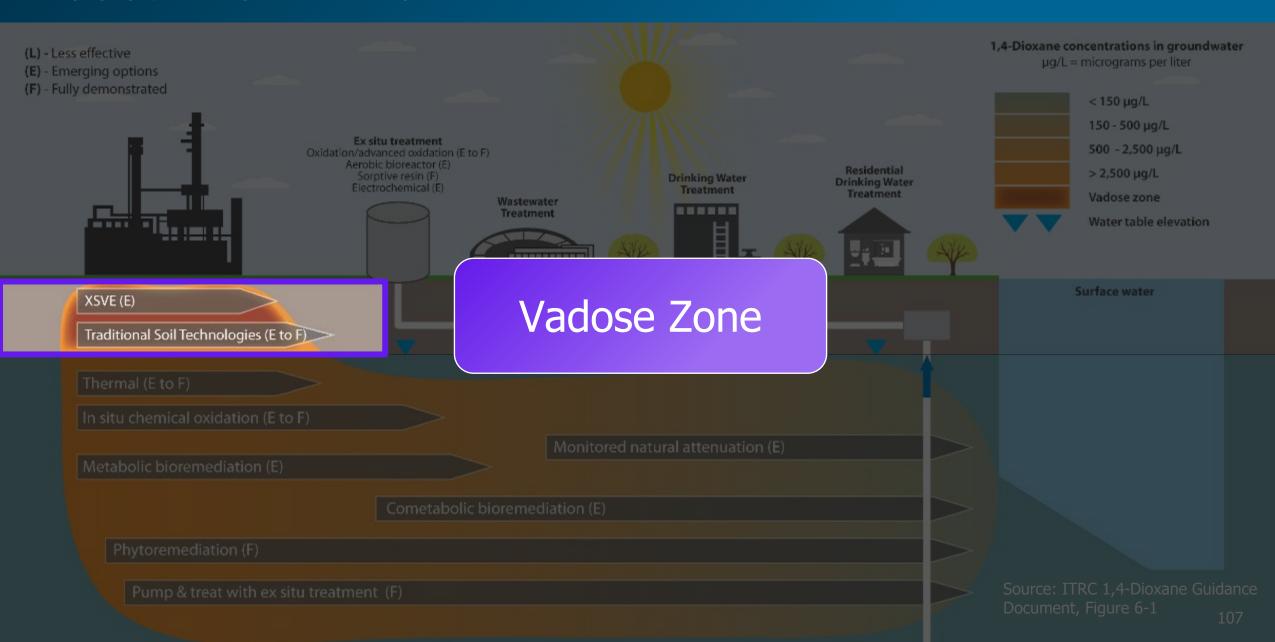


Remediation and Treatment Technologies

Case Study Available



Vadose Zone Treatment



Vadose Zone Treatment



Fully Demonstrated

- Excavation
- Thermal Desorption
- Solidification/ Stabilization

Emerging Options

- Oxidant Soil Blending
- Extreme Soil Vapor Extraction

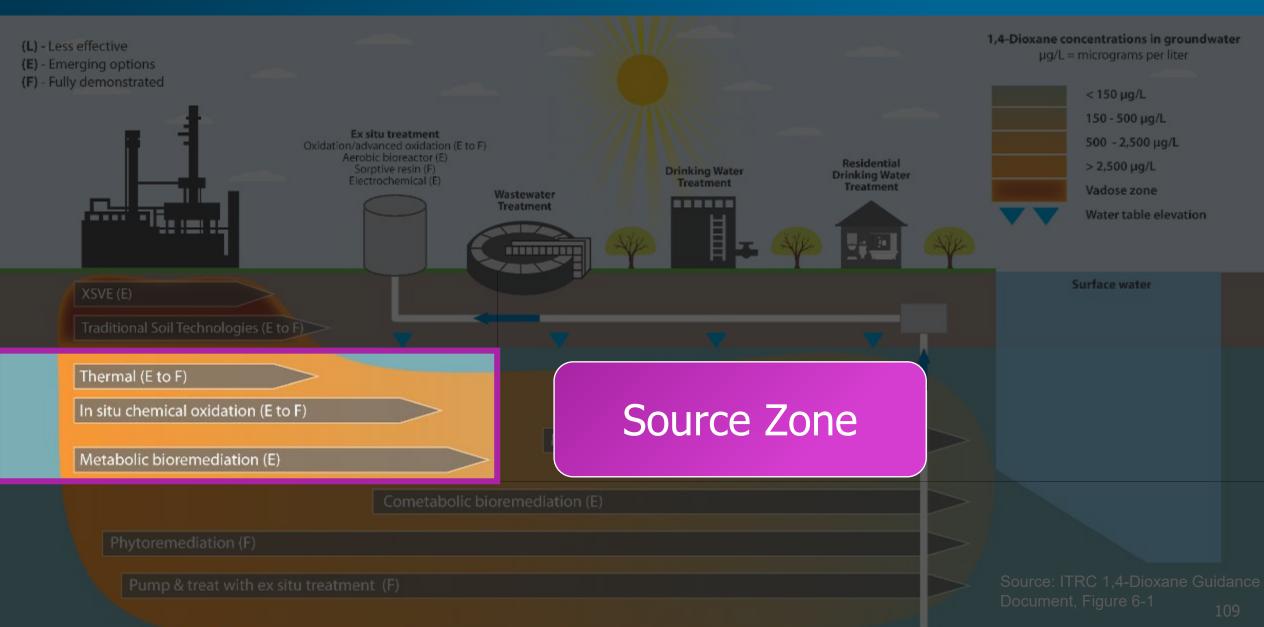
Less Effective

- Conventional Soil Vapor Extraction
- Bioventing
- Bio-piles





Source/Saturated Zone Remediation



In Situ Thermal Treatment



- ► Boiling point is 101.5°C, but is less when mixed with water
- Volatility can increase with heating
- ► Treatment zone heated and vapors captured
- ► Three types: ERH; TCH; and SEE
- ▶ Benefits: High mass removal
- ► Challenges: High cost, vapor removal affected by heterogeneity

	ERH	TCH	SEE
Heating Mechanism	Electrodes	Heaters	Steam Injection
Maximum temperature	~100°C	~300°C	~100°C
Heating affected by heterogeneity	No	No	Yes

Electrical Resistive Heating (ERH); Thermal Conductive Heating (TCH); Steam Enhanced Extraction (SEE)





In Situ Chemical Oxidation Reagents



DELIVEDY ADDDOACH



		L		DELIVERY APPROACH				
REAGENT	PHYSICAL STATE	ACTIVATOR	LONGEVITY	Direct Push	Fixed Well	Gas Injection	Slurry	Cylinder
		Heat	weeks to months	/	/	-	-	-
		Hydrogen Peroxide	weeks to months	1	1	-	-	-
Persulfate	liquid solution (sodium persulfate);	Alkaline	liquid: weeks to months solid: months	/	/	-	1	/
solid (potassium persulfate)	Chelated Iron	weeks to months	1	1	-	-	-	
	porounato)	ZVI	months	-	-	-	1	/
		Natural Mineral Acti∨ation	months	1	1	-	1	-
Ozone 🔲	gas	-	30 minutes in water	-	-	1	-	-
Peroxone	liquid solution (hydrogen peroxide); gas phase ozone	-	ozone as above; hydrogen peroxide: weeks	,	,	,	-	-
Modified Fenton's Reagent	liquid solution (hydrogen peroxide)	Ferrous Iron	weeks	,	,	-	-	-
Permanganate ∷	liquid solution (sodium permanganate); solid/dilute solution (potassium permanganate)	-	liquid: months solid: months to years	,	,	-	,	,

Chemical Species	Standard Oxidation Potential	
Hydroxyl radical (OH-•)	2.8	
Sulfate radical (SO4-•)	2.5	4
Ozone	2.1	ן
Sodium persulfate	2.0	
Hydrogen peroxide	1.8	
Permanganate	1.7	{
Chlorine	1.4	
Oxygen	1.2	
Superoxide ion (O-•)	-2.4	7

Source: Siegrist et al. 2001

ISCO and 1,4-Dioxane





- (L) Less effective
- (E) Emerging options
- (F) Fully demonstrated

Reagents yielding free radicals with higher oxidation/ reduction potential will degrade 1,4-dioxane more rapidly

- Hydroxyl radical
- Sulfate radical

reatment ed oxidation oreactor (E) e resin (F) iemical (E) Co-contaminants sometimes also treated

- Chlorinated ethenesyes
- Chlorinated ethanes
 (1,1,1-TCA; 1,1 DCA; 1,2-DCA)
 not always treated

Resident Drinking V Treatme

Source area versus plume remediation

 Injections versus permeable reactive barrier

ISCO – Other Considerations





Design Considerations

- Optimizing contact (longevity, permeability, etc.)
- Matrix diffusion

Water Quality Issues

- Reagent scavengers/matrix demand
- Temporary metals mobilization
- Bench testing recommended

Byproducts

- Bromate formation (ozone/H₂O₂)
- Sulfate
- Gases: CO₂, O₂
- Ions (K+, Na+)
- pH change



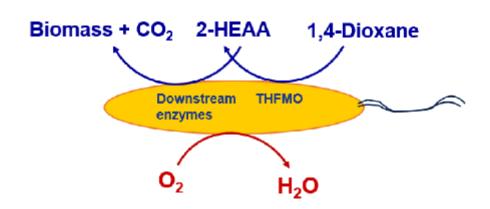
In Situ Metabolic Bioremediation



► 1,4-Dioxane used as carbon and energy source by bacteria

& Transport
Training, too

- ► End products are biomass and carbon dioxide (CO₂)
 - Lower biomass yield and rates than other metabolic processes (TCE/hydrocarbons)
 - ➤ Suitable for higher 1,4-dioxane concentrations
 - Requires oxygen to be present



Source: ITRC 1,4-Dioxane Guidance Document, Figure 6-4



In Situ Metabolic Bioremediation



Key Design Parameters	Effectiveness	Advantages	Disadvantages
Oxygen delivery Initial bacteria culture mass	starting concentrations	Effective for source areas Does not require injection of a primary substrate	Bioaugmentation may be required, and limited microbial transport may be a concern Technology requires maintenance of aerobic conditions, and chlorinated compounds/metals may inhibit biodegradation

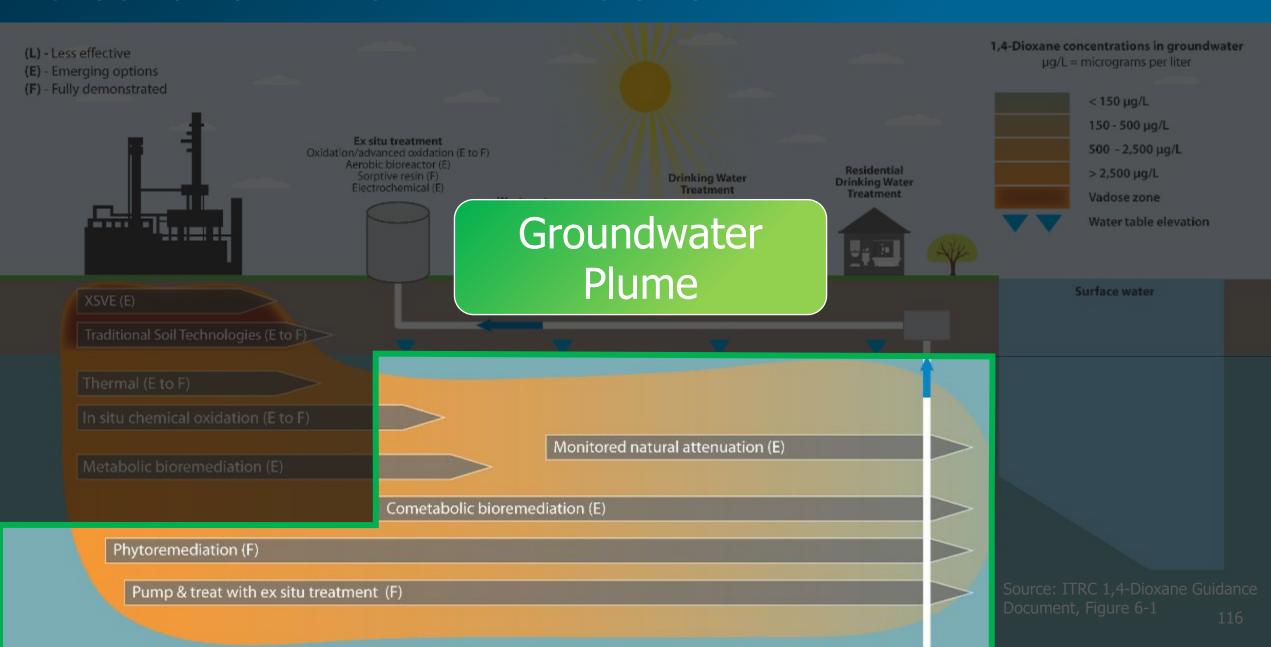
Source: ITRC 1,4-Dioxane Fact Sheet, Table 2







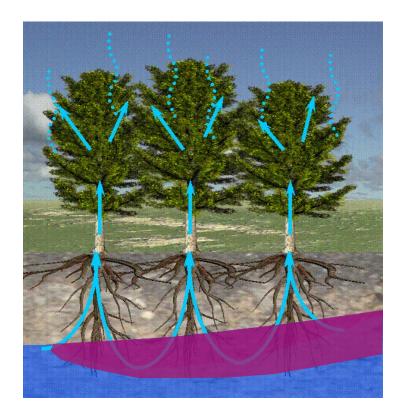
Groundwater Plume Remediation



Phytoremediation







Source: Graphic modified from ITRC Phyto-2 2009

- Mechanism for treatment is "phyto-extraction"
 - ► Pull 1,4-dioxane in through roots, up xylem, out to atmosphere
- **▶** Benefits
 - ▶ Semi-passive
 - ► Leverages properties of 1,4-dioxane
- ► Challenges
 - ► Longer timeframe
 - ▶ Deep groundwater requires certain design

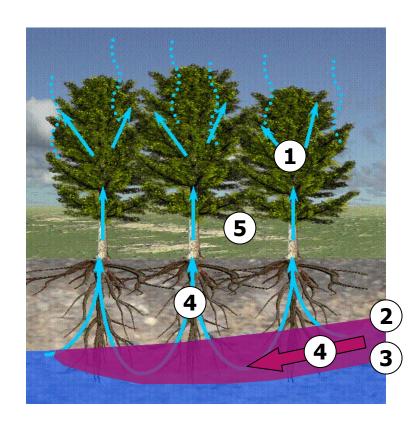




Phytoremediation







Source: Graphic modified from ITRC Phyto-2 2009

DESIGN CONSIDERATIONS

- Use correct plant(s) for region
- 2. Depth of groundwater: 10-15 ft bgs optimal, 25 ft bgs maximum
- Depth of 1,4-dioxane impacts: Within top5 ft of groundwater is optimal
- 4. Water budget: Compare groundwater flux in versus estimated tree transpiration
- 5. Number of trees and spacing







In Situ Cometabolic Bioremediation





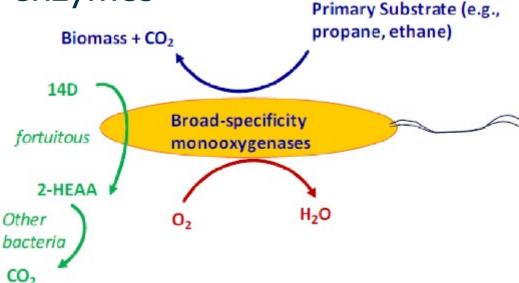
▶ Bacteria uses a primary growth substrate to sustain activity

► 1,4-Dioxane biodegraded fortuitously by enzymes generated from bacteria activity

Can also degrade other constituents of concern

- Suitable for high or low 1,4-dioxane concentrations
- Requires oxygen to be present

Check out the Fate & Transport Training, too



Source: ITRC 1,4-Dioxane Guidance Document, Figure 6-2



In Situ Cometabolic Bioremediation





Key Design Parameters	Effectiveness	Advantages	Disadvantages
Oxygen delivery		Can degrade both chlorinated compounds and 1,4-dioxane	Bioaugmentation may be required
Initial bacteria culture mass present or injected	Degrades 1,4-dioxane to <1 μg/L	Several viable brimary	Flammable gases are typically applied as primary substrate
Primary substrate delivery and nutrients	A treatment option for low starting concentrations	Applicable to dilute plumes	Technology requires maintenance of aerobic
		Independent of 1,4-dioxane	conditions, and chlorinated compounds/metals may inhibit biodegradation

Source: ITRC 1,4-Dioxane Fact Sheet, Table 2







In Situ Monitored Natural Attenuation



MNA programs generally include assessing the favorability of attenuation under site-specific conditions as part of a multiple lines of evidence approach.

- Low Henry's law constant means low volatility
- Low organic carbon partition coefficient means low sorption

Important Properties

Relevant Attenuation Mechanisms

- Dilution
- Diffusion
- Biodegradation

- Indigenous microbes
- Oxygen availability
- Primary substrate availability
- Inhibitors

Biodegradation Considerations







In Situ Monitored Natural Attenuation



► Analytical methods – need to take into account project-specific reporting limits



▶ Geochemical parameters – associated with aerobic/cometabolic conditions



► Microbiological analyses – direct and indirect biomarkers (DXMO, ALDH vs other monooxygenases)



► CSIA – isotopic enrichment provides evidence of degradation, limited by analytical detection limits

Note that these are evolving analytical techniques and the industry is still learning how to best apply them.





1,4-Dioxane Critical Characteristics

Property	Units	1,4-Dioxane	Benzene	TCE	1,1,1-TCA	1,1-DCA	1,1-DCE
Water solubility	g/L	1,000	1.8	1.1	0.91	5.04	5.06
Vapor pressure	mm Hg (at 25°C)	23.8	95.2	72.6	124	227	234
Henry's Law constant	atm- m ³ /mol (at 25°C)	4.8 x 10 ⁻⁶	5.48 x 10 ⁻³	9.1 x 10 ⁻³	1.6 x 10 ⁻²	5.62 x 10 ⁻³	5.8 x 10 ⁻³
Log K _{oc}	Dimension- less	0.54	1.92	1.81	2.18	1.55	1.48
Boiling point	°C	101	80	87	74	57.4	32



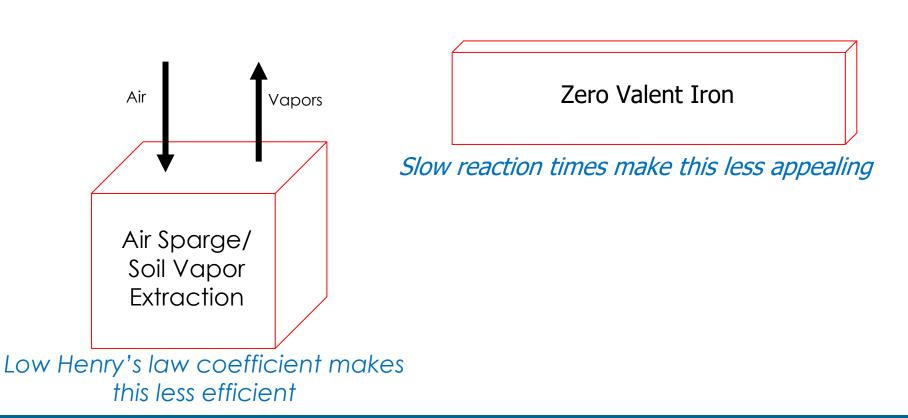


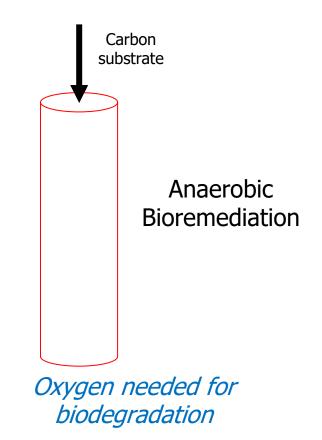


Less Effective In Situ Technologies



Note that less effective technologies may still impart *some* benefit, but may not reach targets











Ex Situ AOPs and 1,4-Dioxane





	EFFECTIVENESS			GROUNDWATER TREATMENT		
METHOD TO	CO-CONT		AMINANTS	APPROACHES		
CREATE HYDROXYL RADICALS	1,4-DIOXANE	CHLORINATED ETHENES	CHLORINATED ETHANES	PUMP AND TREAT	DYNAMIC GROUNDWATER RECIRCULATION	
UV/hydrogen peroxide	1	1	-	1	/	
Ozone/hydrogen peroxide	1	1	TCA yes; DCA reluctant	1	/	
UV/titanium dioxide catalyst/oxidant	1	1	-	1	,	
UV/hypochlorite	1	/	-	/	/	
UV/ozone/hydrogen peroxide	1	1	✓ (multiple oxidants)	1	/	

Chemical Species	Standard Oxidation Potential
*exited electron + electron gap	3.18 - 4.8
Hydroxyl radical (OH-•)	2.8
Sulfate radical (SO4-•)	2.5
Ozone	2.1
Sodium persulfate	2.0
Hydrogen peroxide	1.8
Permanganate	1.7
Chlorine	1.4
Oxygen	1.2
Superoxide ion (O-•)	-2.4

Source: Siegrist et al. 2001







Ex Situ AOP – Other Considerations





Design Considerations

- Electrical/chemical usage
- Matrix diffusion

Water Quality Issues

- Influent water quality (e.g., iron)
- Effectiveness in low pH water (UV/hypochlorite)
- Reagent scavengers
- Bench testing recommended

Byproducts

- Bromate formation (ozone/H₂O₂)
- Gases: CO₂, O₂
- Free radicals (ozone/H₂O₂)
- pH change



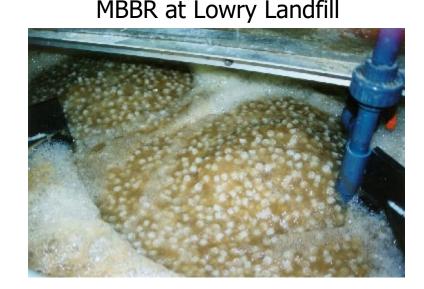


Ex Situ Bioreactors



- Metabolic Bioreactors
 - ► Laboratory fluidized bed reactor for high concentrations
 - ► Multi-stage aerobic system
 - ► Bio-GAC
 - ▶ No full-scale applications
- ▶ Cometabolic Bioreactors
 - ► Early studies showed that cometabolic bioreactors can be effective for treating wastewater with both 1,4-dioxane and tetrahydrofuran (cometabolic substrate)
 - ► Lab-scale trickling filter
 - ► Lab-scale reactors fed propane or ethane (fluidized bed reactor, membrane biofilm reactor)
 - ► Full-scale moving bed bioreactor (MBBR; Lowry Landfill)









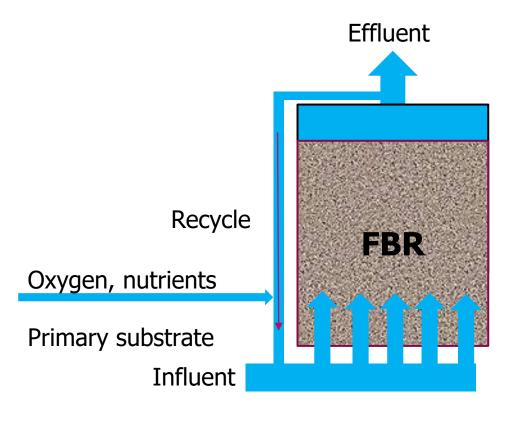


Ex Situ Bioreactors



- **▶** Design Considerations
 - ► Concentration of 1,4-dioxane
 - ► Effluent requirements
 - ► Co-contaminants
 - ► Metabolic vs cometabolic
 - ► Flow rate
 - ► Hydraulic retention time
 - ► Oxygen and inorganic nutrients
 - ▶ Primary substrate (cometabolic)
 - ► Microbial culture(s)

Fluidized Bed Bioreactor (FBR)







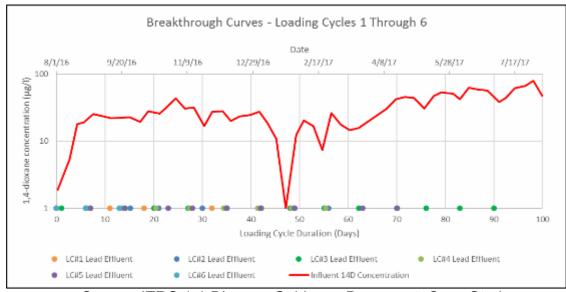
Ex Situ Sorptive Resin





- ▶ Many sorbents are ineffective for treating 1,4-dioxane (e.g., GAC, IX)
- ► Synthetic AMBERSORBTM 560 resin has been applied at full-scale
 - ► Typically a lead-lag configuration
 - ► Steam regeneration
 - ▶ 1,4-Dioxane treatment of regenerant necessary

AMBERSORB™ treatment of 1.4-dioxane



Source: ITRC 1.4-Dioxane Guidance Document, Case Study







Less Effective Ex Situ Technologies

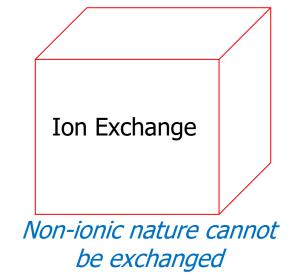


Note that less effective technologies may still impart *some* benefit, but may not reach targets

Air Stripper

Reverse Osmosis/Nanofiltration

Small molecular weight makes these less efficient



Liquid-Phase **Granular Activated** Carbon

Low sorption coefficient makes LGAC inefficient. May not be feasible/economical for drinking water, wastewater, and high-flow groundwater systems. May be applied to low-flow groundwater or residential treatment.





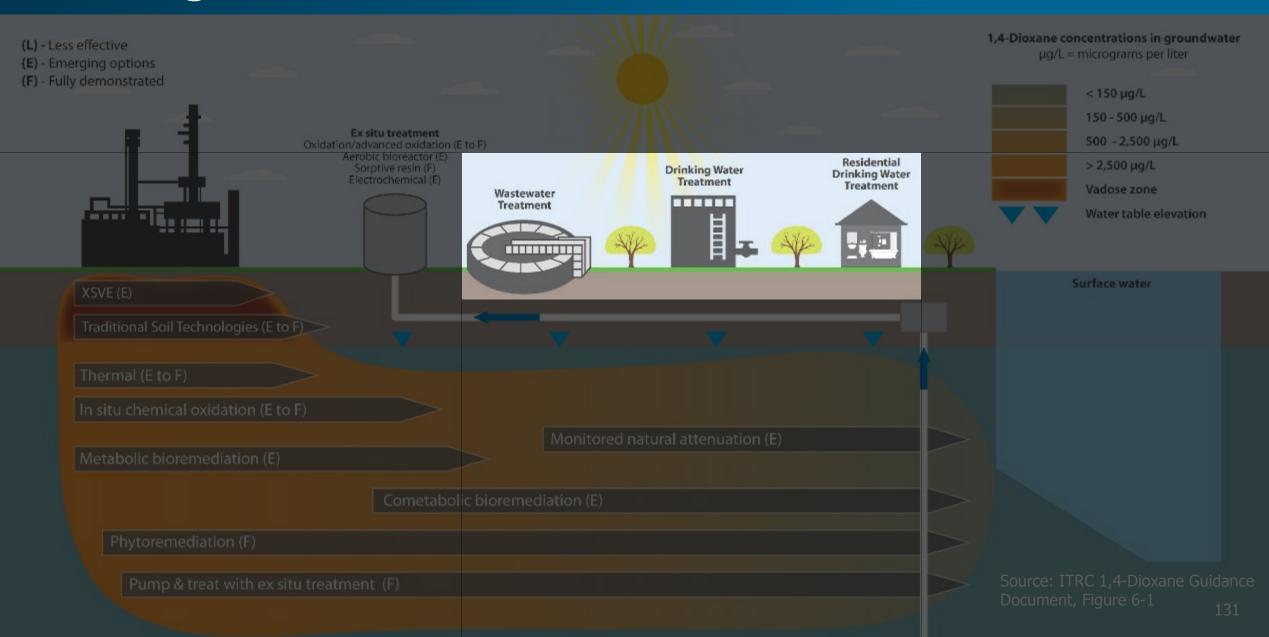
Low Henry's law

coefficient

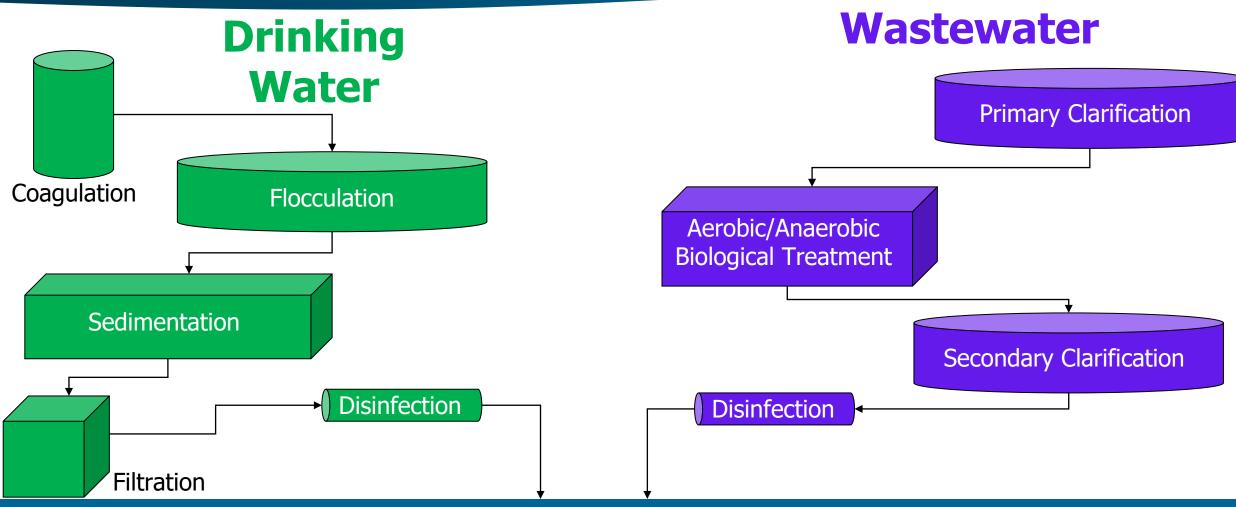
makes this less efficient



Drinking Water and Wastewater Treatment



Conventional DW/WW Treatment

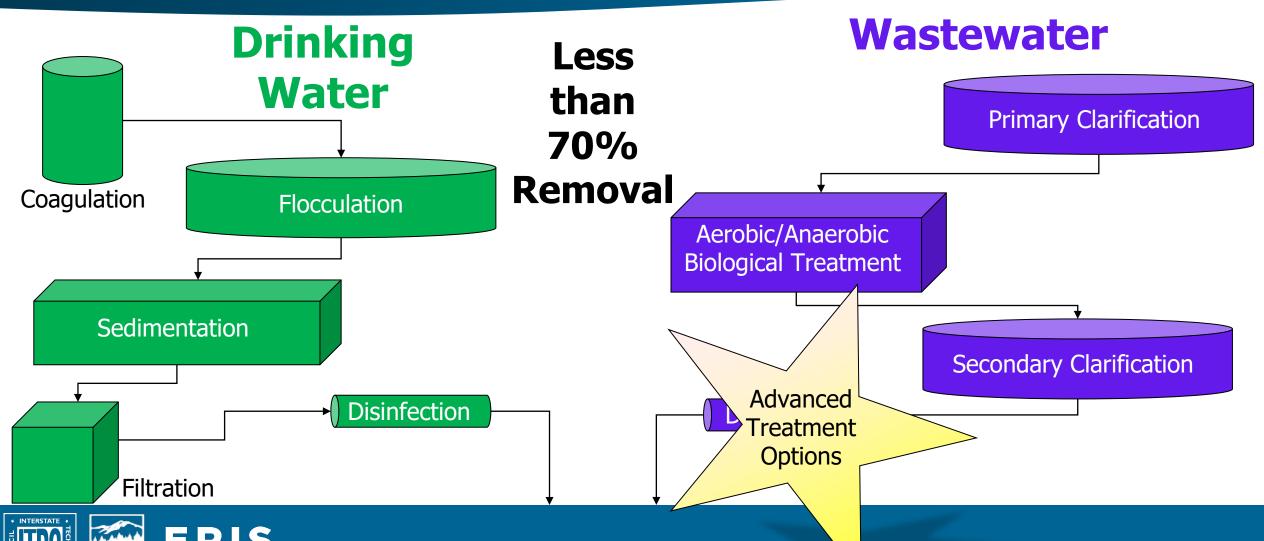








Conventional DW/WW Treatment



Residential DW Treatment







Common Residential Water Treatment

- Less effective
 - Particulate filters
 - Water softening
 - UV disinfection
 - Pitcher/faucet filters



 Activated carbon (i.e., LGAC) can be used if designed properly







Remediation and Treatment Technologies

1,4-Dioxane concentrations in groundwater (L) - Less effective (E) - Emerging options Fully demonstrated Reside Drinking ' Be mindful of Treatm existing Many options remediation Best option for 1,4will vary from approaches dioxane site to site that might not treatment be the best for 1,4-dioxane

Thank you for attending! Questions & Answers?

- ► 1,4-Dioxane Modules will be hosted for separate viewing On Demand
- ► Questions? <u>itrc@itrcweb.org</u>
- ▶ Want more? For additional training on 1,4-Dioxane, visit

https://clu-in.org/conf/itrc/14d/

1,4-Dioxane Modules

Module 1: History of Use (Sect 1)

Module 2: Regulatory Framework (Sect 2)

Module 3: Fate and Transport (Sect 3)

Module 4: Sampling and Analysis (Sect 4)

Module 5: Toxicity and Risk (Sect 5)

Module 6: Remediation Technologies (Sect 6)

Feedback Form (to receive a certificate of completion – for attending the full 1,4D training): https://clu-in.org/conf/itrc/14D-1/default.cfm#tabs-5



