LUST Investigation – Five Basic Questions

- 1. Is there a problem that warrants action?
- 2. If so, what is the root cause?
 - Follow the 98/2 rule!
- 3. What actions will control the problem quickly and cost-effectively?
- 4. Are there secondary problems that require action?
- 5. What additional actions/controls will:
 - ✓ Stabilize the situation
 - ✓ Get time working for us, not against us
 - ✓ Set the conditions for natural attenuation

Ten Things to Know and Why

- 1. Source in the vadose zone
 - Potential groundwater or vapor issues
- 2. Porosity of vadose zone
 - Control vapors and/or remove source?
- 3. Depth to water
 - Potential LNAPL?

Ten Things to Know and Why

- 4. Water table fluctuation
 - Smear zone
- 5. Permeability of smear zone
 - AS/SVE, Injection, Excavation
- 6. Direction of groundwater flow
 - Off-site migration
 - Potential receptors
- 7. Plume thickness and depth
 - How/where to treat, contain or intercept

Ten Things to Know and Why

- 8. Permeability lenses in saturated zone
 - Transport zones?
 - Storage zones?
- 9. Mass distribution
 - High-mass footprint? (Root cause 98:2)
- 10. Matrix distribution
 - What are my remediation options?

Real-Time, Collaborative, Decision-Making -- A Better Way?



Direct-Sensing/High-Resolution Technologies

- Spatial distribution of COCs where to remediate
- Matrix distribution of COCs how to remediate
- VOCs, Metals, PAHs/PHCs ----- Lithology, Permeability, Hydraulic Conductivity
- Dense vertical data sets Accuracy of CSM depends on density of borings



Data as a Deliverable

- Real-time data capture in the field
- Daily uploads to SCRIBE/EQUIS
- Immediate interpretation visualization, models, etc.



Collaborative Decision-Making and Actions

- Data visualizations uploaded to SharePoint, response.epa.org, or FTP sites
- Data available to all stakeholders for multiple uses (independent or group)
- Reach consensus on Conceptual Site Model, data gaps, and next actions







Typical MiHPT Support Van

Lab-Grade Contaminant Detectors

- Photoionization (PID)
- Flame ionization (FID)
- Electron capture (ECD)





Order of magnitude lower





A Simple Site

Delmar Supply Wells Delmar, DE/MD









Attack Root Cause



Address Buffer Zone



Monitor/Manage Attenuation Zone



Step 3: Attenuation Zone

ERT3-02

- Monitor to ensure attenuating plume (low cost)
- Manage risk with institutional or engineering controls (low cost)
- Attenuation zone remediation unlikely
- Investigation and remedial strategy shown in these figures: 5 Days -- \$65k

Data 450alization completed by S2C2 Inc. See Data 450 Data Visualization for the Delmar Public Supp Superfund Site, Delmar, Maryland Report.

3 psi

DSI

Conventional Assessment Techniques Necessary?

- Quantify and verify direct-sensing information
- Fill specific data gaps
- Focus on root causes and effective solutions
 - Water problem in soil?
 - Soil problem in water?
- Optimally placed monitoring wells, soil borings, vapor points, etc.

Rules of Thumb

- Production rates
 - GeoProbe (MIHPT): 125-150 feet per day
 - CPT (LIF, XRF, MIP): 250-300 feet per day
- Typical boring depths
 - GeoProbe: 30-50 feet
 - Cone Penetrometer: 50-100 feet
- Daily costs: \$7500
- 3-D Visualization -- \$5000 to \$25,000
- 2-D Visualization Can do it yourself (download GeoProbe's DI viewer)

Limitations

- Direct Push Technologies
 - Must be able to push to/through contaminant layer
- Typical Detection Limits
 - VOCs -- >100 ppb
 - LIF free product
- MIP and LIF are not compound specific
- Subsurface utilities must be known!
- Need qualified subs (things break!)
- Need qualified oversight professionals

Hidden Costs of LUST Sites – What is your experience?



What about HRSC at historic releases?

- Source (root cause) often not adequately characterized
- Remedy often focused on symptoms
- Remedies consequently ineffective and costly
- Investigations continue well beyond the remediation zone

Pragmatic Approaches

- Begin with the end in mind
- Develop conceptual site models via direct sensing techniques (less time / less \$)
- Attack root cause (mass, not molecules)
- Set up conditions for natural attenuation (buffer zone treatment)
- Move faster than the conventional regulatory process (collaborative decisions)
- Use lab to document solutions, not problems

80/20 Spend Shifts

Conventional Assessment

Passive Remediation

Real-Time Assessment

Active Remediation of Root Causes **Active Remediation**

Prevention/Detection Engineering Prevention/Detection Engineering

Compliance Monitoring

(should be a much smaller bucket)