Small Scale Vapor Mitigation

From Due Diligence to Post System Installation Operations and Maintenance Plans

November 15, 2024

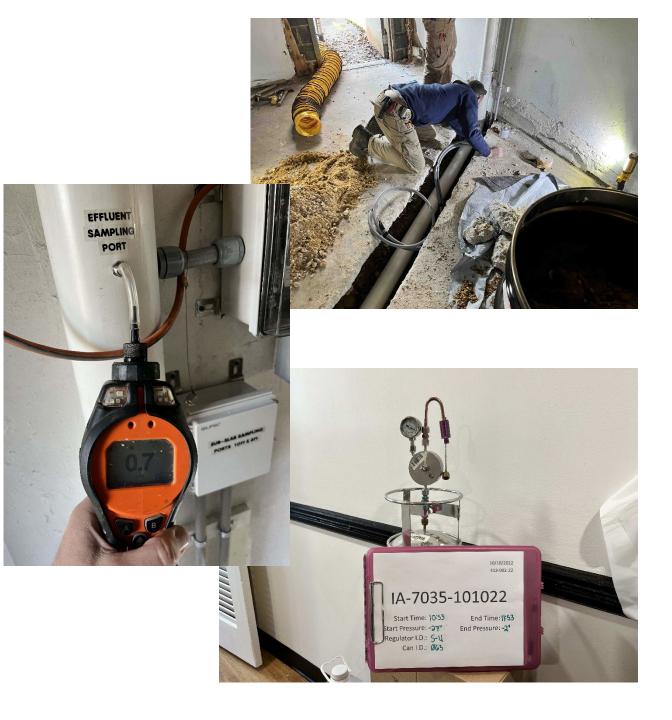
Prepared by:





Topics of Discussion

- Introduction
- Environmental Due Diligence
- Developing the Plan
- Diagnostics and System Design
- Post-System Sampling / Land Use Restrictions
- Long Term O&M
- Case Studies





THE URBAN GREEN TEAM

- Environmental Consulting Firm in Locust Point, Baltimore City
- Established in March 2007
- 8 employees
- Collaborative group of Engineers, Scientists
 and Geologists
- Key Employees:
 - Denise A. Sullivan, P.E., Principal
 - Gary Suskauer, Client Services Manager
 - David Sena, Director of Environmental Services





The Need for Vapor Mitigation Typically Results from Due Diligence

Why Perform Environmental Due Diligence?

- *Reduce Risk (e.g. CERCLA liability)*
- Identify Unknown Conditions
- Understand Property Limitations
- Understand Timing for Investigations/Closure
- Understand Costs
- Understand Red Flags for Future Financing / Development /
- Support Regulatory Programs (VCP/CHS)



Environmental Due Diligence

PHASE I ENVIRONMENTAL SITE ASSESSMENTS

Goal

To investigate a property by non-intrusive means and evaluate a release or potential release of hazardous materials and/or petroleum products to the environment.

Common Drivers for Vapor Intrusion Condition

- Current/Former Dry Cleaner
- Current/Former Auto Repair
- Current or Former Tanks (underground or aboveground)
- Former Gasoline filling station
- Former Printers
- Former Manufacturing
- Adjoining and Nearby Properties
- Prior Environmental Reports



PHASE I ENVIRONMENTAL SITE ASSESSMENT

A good Phase I can provide critical information for future investigations, development of the Conceptual Site Model, and vapor mitigation system design

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EXAMPLE PHASE I ESA INFORMATION							
Property Overview	Current Utilities (Municipal Water and Sewer vs. Well/Septic) Foundation type (old vs. new, slab, crawl space, basement) Building configuration and Building expansion over time HVAC Tenants/current use(s) Inaccessible areas Access (future equipment) Preferential Pathways On-site and off-site Receptors						
Historic Records	Solvent or Petroleum storage areas / uses						
Regulatory Records	Chemical usage and generation (RCRA) Spills / Prior Case Files (MDE OCP, LRP, SHW) Tanks Nearby wells						
Interviews	Uses (current, historic, future)						
Figure	Building and Site Layout Chemical use areas Utility locations (if known) Neighboring properties / Right-of-ways						
Photos	Current slab conditions Building configuration Access						
Report User	Owner, Purchaser, Investor, Fiduciary, Tenant						



ONLINE (FREE) RESOURCES

Resource	Website	Information Available
Maryland Department of the Environment (MDE) LRP Map	https://mde.maryland.gov/programs/LAND/MarylandBro wnfieldVCP/Pages/mapping.aspx	MDE VCP / CHS listings; link to Maryland Department of Assessment and Taxation (SDAT)
Maryland Department of Assessment and Taxation, Real Property Database	https://sdat.dat.maryland.gov/RealProperty/Pages/defaul t.aspx	Property information Property Map (ex. Baltimore City)
Maryland Land Records	https://www.mdlandrec.net/main/	Current Deed; historical deeds
MDE Oil Control Program (OCP) UST Facility Summary Report	<u>https://mes-</u> mde.mde.state.md.us/FacilitySummary/default.aspx	MDE Underground Storage Tank Case Files
MDE OCP LUST Listings	https://mes-mde.mde.state.md.us/caseinformation/	MDE Oil Releases / UST Closures
United States Environmental Protection Agency (USEPA)	https://enviro.epa.gov/facts/myproperty/	Federal permits, listings and sites
County GIS / Mapping	County specific https://www.baltimorecountymd.gov/departments/infor mation-technology/gis/	County GIS systems will often have zoning information, old site figures, etc.
Google Earth Pro	https://www.google.com/earth/about/versions/#earth- for-web	Historical Aerials; recommend download app – version has more data
NETR	https://netronline.com/public_records.htm	Regulatory databases and aerial
Enoch Pratt Library Online Sanborns	https://www.prattlibrary.org/research/databases/maryla nd-dc-sanborn-maps	Historical Sanborn Atlases

Environmental Due Diligence

PHASE II

ENVIRONMENTAL SITE ASSESSMENTS





PHASE II ENVIRONMENTAL SITE ASSESSMENT

During the Phase II ESA we start to understand why we may need a vapor mitigation system

	EXAMPLE PHASE II ESA INFORMATION								
Phase II Planning	Current and Future Building Locations Property Survey Utility locations (MissUtility / Private Utility Markouts) Current / Former Tank Locations (Ground Penetrating Radar / Geophysical Investigations) Concrete / Slab condition Access Inaccessible Areas Discharge Locations Confirm Phase I ESA observations/results								
Field Investigation	Concrete / Slab Thicknesses Subslab Soil Type Depth to Groundwater Presence of Perched Water Fill Access Field Observations (odor, color/staining) Field Screening (PID, CGI)								
Sample Results	Soil Groundwater Soil Gas (active, passive, timed)								
Current and Future Uses	Residential Non-residential/Commercial Recreational Redevelopment Program								



Environmental Due Diligence

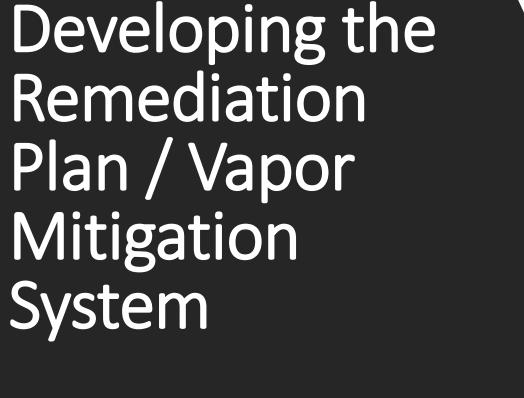
SUPPLEMENTAL PHASE II

ENVIRONMENTAL SITE ASSESSMENTS

- Confirm initial results
- Further evaluate suspect source areas
- Delineation
- Confirm seasonality of results
- Provide additional site characterization
- New sampling to address redevelopment plan modifications
- Standard of Care









- Project Requirements
 - Time / Cost / End Use
 - Land Use Restrictions
- Conceptual Site Model
- Diagnostics
- Vapor Mitigation System
- Post System Confirmatory Sampling
- Final Reporting
- Environmental Covenant
- Operations and Maintenance Plan

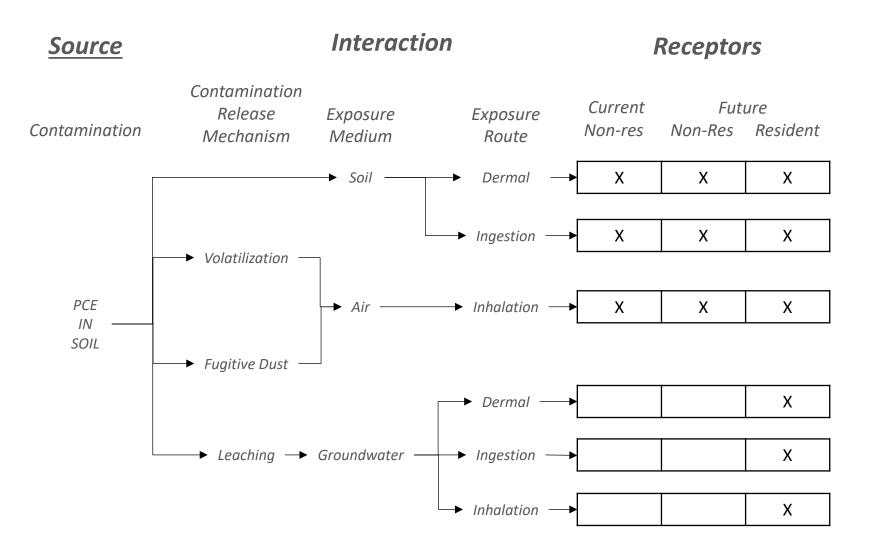


CONCEPTUAL SITE MODEL

Conceptual Site Model

Summarizes site information and identifies the relationship between exposure pathways (complete, incomplete, anticipated) and potential receptors

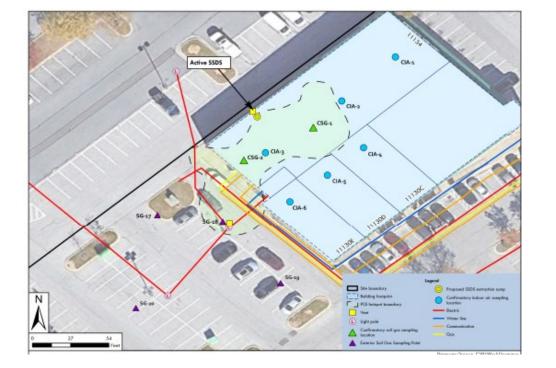
<u>This is an iterative process</u> <u>and is updated as data gaps</u> <u>are identified and filled!</u>

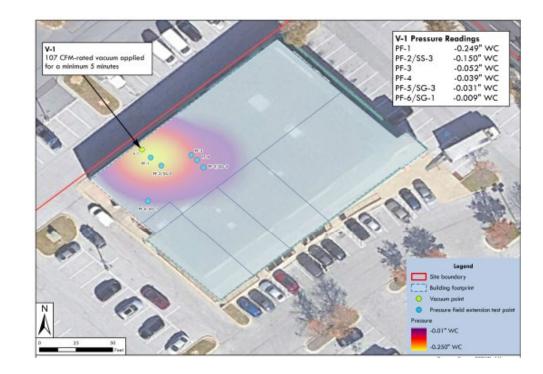


Example Conceptual Site Model



Diagnostics





Vapor Mitigation System Design



Post System Confirmatory Sampling

- Permanent Vapor Monitoring Points
- Indoor Air
- Effluent / Stack Sampling
- Sample Frequency
 - 30 day or 60 day
 - 180 day
 - 12 month

Future Use Restrictions and Institutional Controls

- Land Use Restrictions (Tier I, II, II, IV)
- Groundwater Use Restriction
- Environmental Covenant
- Operation and maintenance plan
- Notice to MDE for any future soil excavation or disturbance
- Plan for handling groundwater encountered during excavations
- Vapor mitigation system operations and maintenance plan
- Installation of a vapor mitigation system for any future Site buildings
- Prohibition from single family residential



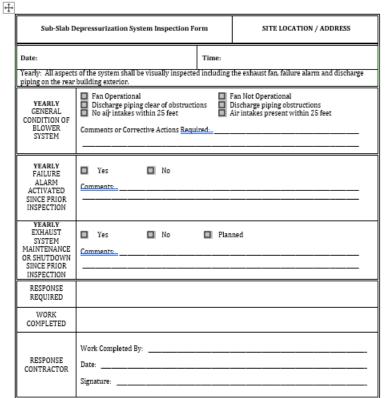
Operation and Maintenance Plans

Monthly Checklist (facility personnel)

					·				
DATE	Power Indicator On	Fan Warning Light Activated	Pressure Gauge Reading	Blower Fan Operational (V/N)	Discharge Piping Clear of Obstructions (V/N)	Air Intakes within 25 ft (VN)	Failure Alarm Activated (V/N)	Maintenance or Shutdown since last inspection (Y/N)	Response Required or Comments
July 19, 2023 / Example	Y	Ν	0.05 P/C	Y	Y	N	N	N	Fans operational, no shutdowns or alarms since last inspection.
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Annual Inspection

YEARLY SUB-SLAB DEPRESSURIZATION SYSTEM INSPECTION FORM



Photographs – System Elements





graph 1. PRIMARY SYSTEM Exterior View - Vapor Mitigation System Exhaust Piping Vent should be free and clear of obstructions

Photograph 2. PRIMARY SYSTEM - Fan and Connections Fan should be running, there should be no loase connections and black <u>half</u> or look which prevents shut off should be present





Photograph 3. PRIMARY SYSTEM - Vapor Mitigation System Gauga Gauge should shaw a pressure difference between subsurface and outside air (as shown)

Photograph 4. SECONDARY SYSTEM Exterior View - Vapor Mitigation System Exhaust Piping Vent should be free and clear of abstructions





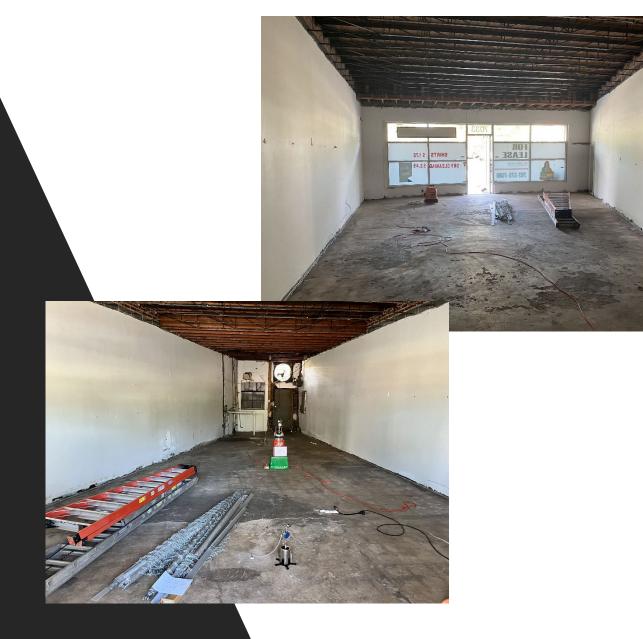
Photograph 5. SECONDARY SYSTEM - Fon Fon should be running, with minimal noise there should be no loose connections

Photograph 6. SECONDARY SYSTEM Interior View -Vapor Mitigation System Gauga Gauge should show a pressure difference between subsurface and outside air (es shown)





Case Study – **Active Strip** Shopping Center / Vacant Unit

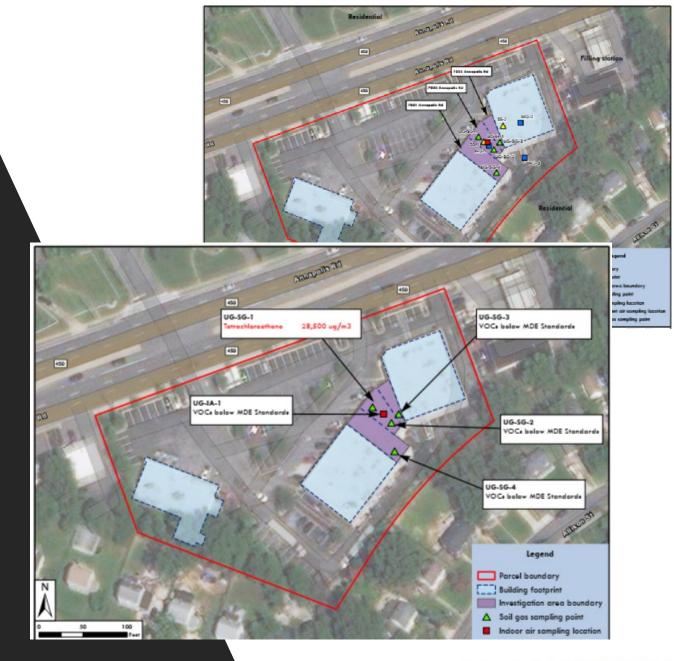


Initial Actions

- Seal floor cracks
- Soil Gas Sampling
- Indoor Air Sampling

Results

- Impacts confirmed in soil gas
- Indoor Air 13,300 ug/m3 to 58.8 ug/m3

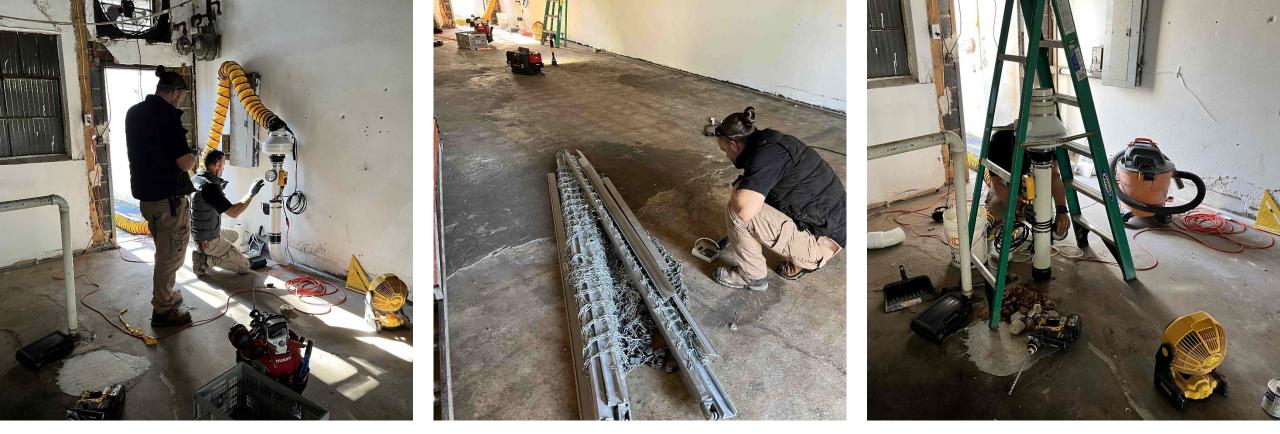






SUPPLEMENTAL INVESTIGATION

- Private Utility Markout
- Soil Gas Sampling
- Indoor Air Sampling

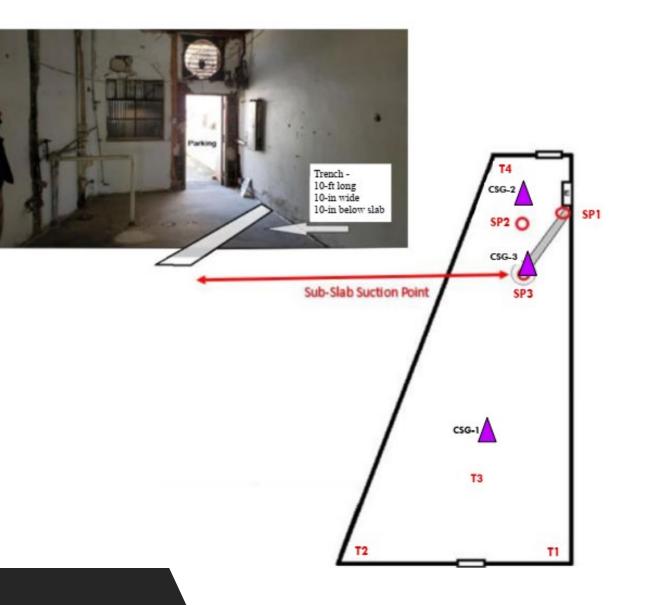


SSDS DIAGNOSTICS

- Four sub slab air pressure test holes
- Two suction points
- Pressure field analysis (variable fan)
- 59 CFM at 2.4 in. WC calculated for mitigation

Vapor Mitigation System Design

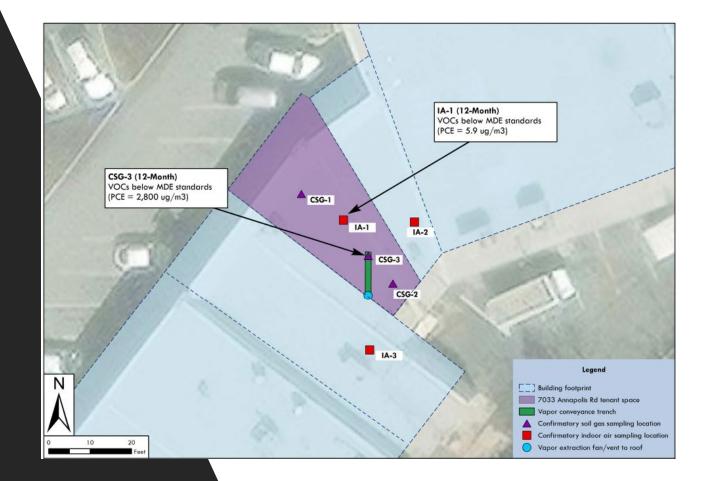
- Active venting system
 - 10 ft trench, 1 ft wide, 1 ft deep
 - 4 inch pvc piping
 - FanTech RN4-E
 - Pressure Gauge/Alarms
 - Permanent VMPs
 - Waste Disposal
- Post System Installation Pressure Field
 Testing
- Confirmatory Sampling
 - Effluent Sampling
 - Soil Gas Sampling
 - 60-day
 - 180-day
 - 12-month





PROJECT SUMMARY

- Total Cost \$38,500
- Project Timeframe 09/2022 to 2/2024
- Remaining Actions 2 year post system sampling



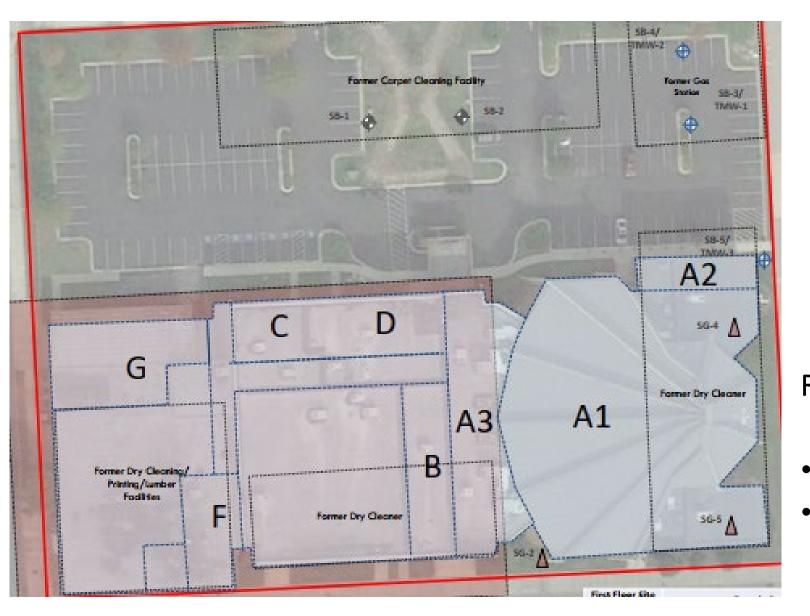




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Case Study

Former Dry Cleaner(s) and Gas Station

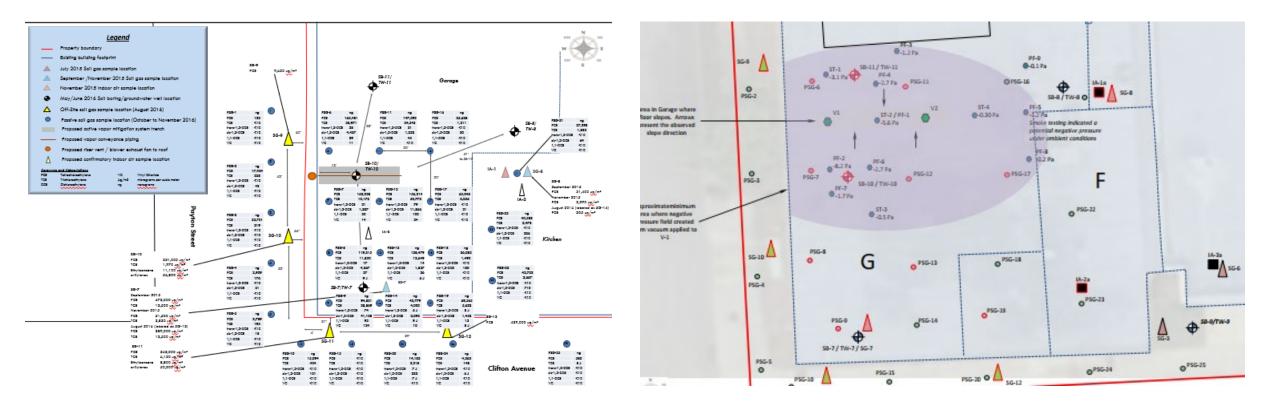


Initial Actions

- Review Prior Reports Phase I and II ESAs
- Supplemental Phase II Soil, Groundwater, Soil Gas Sampling

Results

- PCE and TCE in Soil Gas
- VOCs and TPH DRO/GRO in Groundwater



SUPPLEMENTAL INVESTIGATIONS

- Extensive Supplemental Phase II ESAs (2016 to 2019) including a proposed CAP in 2018 (later revised and submitted in 2019)
- Site Soil, Groundwater, Soil Gas and Indoor Air
- Offsite Soil Gas
- Passive Soil Gas (long term) study
- Results significant localized PCE issue in soil gas in building
- Land Use Restrictions to address impacts in groundwater and soil



Primary System

- 15 ft x 1 ft x 2 ft trench
- 3 inch pvc piping
- FanTech RN2
- Pressure Gauge/Alarms
- Permanent VMPs
- Soil Removal

Secondary System

- Extraction Sump
- 3 inch pvc piping
- FanTech RN2
- Pressure Gauge/Alarms
- Permanent VMPs
- Waste Disposal

Confirmatory Sampling

- Effluent Sampling (monthly) – 6 mos.
- Soil Gas Sampling 1, 6, 12, and 36 months
- Indoor Air Sampling 1, 6, 12, and 36 months

SSDS DESIGN AND INSTALL

					1-N	1-Month Sampling Event 6-Month		Month Sampling Ev	ent	12-	Month Sampling Ex	ent	36-Month Sampling Event			
		Tier 1 Target Subslab		Sample ID	CSG-1	CSG-2	CSG-1	CSG-1 (6 Month)	CSG-2 (6 Month)	CSG-3 (6 Month)	CSG-1 (12 Month)	CSG-2 (12 Month)	CSG-3 (12 Month)	CSG-1 (36 Month)	CSG-2 (36 Month)	CSG-3 (36 Month)
Analyte	CAS Number	Soll Gas	Soll Gas	Depth	Subslab	Subslab	Subslab	Subslab	Substab	Subslab	Subslab	Subslab	Subslab	Subslab	Subelab	Subelab
		Concentration	Concentration													
		(ug/m ¹) ¹⁰	(ug/m ²) ¹⁴⁾	Date	8/28/20	8/28/20	8/28/20	1/27/21	1/27/21	1/27/21	7/28/21	7/28/21	7/28/21	7/25/23	7/25/23	7/25/23
Volatile Organic Compounds (70-15 / ug/m	·)															
Acetone	67-64-1	13,700,000	68,500,000		ND (27,300)	21.5	989	ND (6,000)	ND (9.60)	ND (96.0)	ND (6,140)	28.3	ND (194)	ND (1,200)	ND (19.2)	ND (24.0)
Benzene	71-43-2	1,600	8,000		ND (1,820)	1.02 J	64.6.1	ND (400)	ND (0.64)	ND (6.40)	ND (410)	2.241	ND (12.9)	ND (80.0)	ND (1.28)	ND (1.60)
Carbon disulfide	75-15-0	310,000	1,550,000		ND (17,700)	6.48	ND (451)	ND (3,900)	ND (6.24)	ND (62.4)	ND (3,990)	ND (15.6)	ND (126)	ND (780)	ND (12.5)	ND (15.6)
Chloromethane	74-87-3	40,000	200,000		ND (1,160)	0.91 J	ND (29.6)	ND (256)	ND (0.41)	ND (4.10)	ND (262	ND (1.03)	ND (8.28)	ND (51.3)	ND (0.82)	ND (1.03)
cis-1,2-Dichloroethene	156-59-2	15,400	77,000		2,700 J	ND (0.79)	951	ND (494)	ND (0.79)	1,330	913 J	ND (1.98)	487	139	ND (1.58)	189
trans-1,2-Dichloroethene	156-60-5	31,000	155,000		ND (2,470)	ND (0.79)	ND (57.1)	ND (494)	ND (0.79)	38.1	ND (506)	ND (1.98)	16 J	ND (98.8)	ND (1.58)	9.12
Ethylbenzene	100-41-4	5,000	25,000		ND (2,470)	1.221	ND (62.9)	ND (544)	ND (0.87)	ND (8.70)	ND (557)	ND (2.18)	ND (17.6)	ND (109)	ND (1.74)	ND (2.18)
4-Ethyltoluene	622-96-8	-			ND (2,780)	4.33	128 J	ND (613)	ND (0.98)	ND (9.80)	ND (627)	2.461	ND (19.8)	ND (123)	ND (1.96)	ND (2.45)
n-Heptane	142-82-5	176,000	880,000		ND (2,330)	1.48 J	ND (59.2	ND (513)	ND (0.82)	ND (8.20)	ND (525)	ND (2.05)	ND (16.6)	ND (103)	ND (1.64)	ND (2.05)
Methyl ethyl ketone (2-Butanone)	78-93-3	2,200,000	11,000,000		ND (3,860)	3.66	162 J	ND (850)	ND (1.36)	ND (13.6)	ND (870)	ND (3.40)	ND (27.5)	ND (170)	ND (2.72)	ND (3.40)
Propene	115-07-1	1,320,000	6,600,000		ND (3,860)	ND (1.10)	ND	ND (850)	ND (1.36)	ND (13.6)	ND (870)	ND (3.40)	ND (27.5)	ND (170)	ND (2.72)	4.3
Styrene	100-42-5	440,000	2,200,000		ND (1,680)	0.681	ND (42.6)	ND (369)	ND (0.59)	ND (5.90)	ND (378)	ND (1.48)	ND (11.9)	ND (73.8)	ND (1.18)	ND (1.48)
Tetrachloroethene	127-18-4	18,000	90,000		955,000	11.1	20,500	44,800	35	5,510	264,000	1,210	6,690	72,600	626	1,060
Toluene	108-88-3	2,200,000	11,000,000		ND (2,130)	5.13	196 J	ND (875)	ND (1.40)	ND (14.0)	ND (896)	47.1	39.61	ND (175)	6.63	8.67
Trichloroethene	79-01-6	880	4,400		6,720 J	ND (1.10)	1,820	ND (588)	ND (1.10)	1,070	2,340 J	15	695	511	17.6	177
Trichlorofluoromethane (Freon 11)	75-69-4	310,000	1,550,000		ND (3,120)	37.5	ND (79.5)	ND (588)	1.12 J	ND (11.0)	ND (704)	426	477	ND (138)	207	248
1,2,4-Trimethylbenzene	95-63-6	26,400	132,000		ND (2,780)	6.1	213 J	ND (613)	1.18 J	ND (9.80)	ND (627)	2.951	ND (19.8)	ND (123)	ND (1.96)	ND (2.45)
1,3,5-Trimethylbenzene	108-67-8	26,400	132,000		ND (2,780)	1.771	128 J	ND (613)	ND (0.98)	ND (9.80)	ND (627)	ND (2.45)	ND (19.8)	ND (123)	ND (1.96)	ND (2.45)
2,2,4-Trimethylpentane	540-84-1	-			ND (2,640)	1.65 J	ND (67.2)	ND (581)	ND (0.93)	ND (9.30)	ND (595)	38.3	ND (18.8)	ND (116)	ND (1.86)	ND (2.33)
Vinyl chloride	75-01-4	2,800	14,000		ND (1,450)	ND (0.51)	155	ND (319)	ND (0.51)	106	ND (326)	ND (1.28)	134	ND (63.8)	ND (1.02)	127
o-Xylene	95-47-6	44,000	220,000		ND (2,470)	1.74 J	75.3 J	ND (544)	ND (0.87)	ND (8.70)	ND (557)	ND (2.18)	ND (17.6)	ND (109)	ND (1.74)	ND (2.18)
m- & p-Xylenes	1330-20-7	44,000	220,000		ND (4,830)	3.82 J	138 J	ND (1,060)	1.741	ND (17.0)	ND (1,090)	5.651	ND (34.3)	ND (213)	3.82	5.65

Nates / Superscripts





proph 1. PRIMARY SYSTEM Exterior View - Vapor A System Exhaust Piping Vent should be free and clear of obstructions Photograph 2. PRIMARY SYSTEM - Fan and Connections Fan should be running, there should be no loose connections and block <u>balt</u> or look which prevents shut off should be present





hotograph 3. PRIMARY SYSTEM - Vapor Mitigation System Gauge uge should show a pressure difference between subsurface and outside air (as shown)





System Gauge

air (az zhown)



Photograph 5. SECONDARY SYSTEM - Fon Fon should be running, with minimal noise there should be no loose connections

2024 Environmental Covenant and O&M Plan

DATE	Power Indicator On	Fan Warning Light Activated	Pressure Gauge Reading	Blower Fan Operational (V/N)	Discharge Piping Clear of Obstructions (V/N)	Air Intakes within 25 ft (V/N)	Failure Alarm Activated (VAN)	Maintenance or Shutdown since last inspection (Y/N)	Response Required or Comments
July 19, 2023 / Example	Y	Ν	0.05 IVC	Y	Y	N	Ν	Ν	Fans operational, no shutdowns or alarms since last inspection.
January, 2024									
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Environmental Covenant

- Tier IIB / GW Restriction
- Health and Safety Plan
- Soil Excavation
- Excavations and Groundwater
- Asphalt/CAP Maintenance
- SSDS Operation
- Future Construction Vapor Barrier
- Annual Reporting

O&M (Facility Personnel)

- Monthly Inspection Primary and Secondary Systems
- Power Indicator
- Fan Warning Alarm
- Pressure Gauge Reading
- Discharge Piping Check
- Maintenance or Shutdown Records

YEARLY SUB-SLAB DEPRESSURIZATION SYSTEM INSPECTION FORM Sub-Slab Depressurization System Inspection Form SITE LOCATION / ADDRESS

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aut-atab b	epressui ization system inspection ru		SITE LOCATION / ADDRESS					
Date: Yearly: All aspect: piping on the rear		Time: ed including the exhaust fan, failure alarm and discharge						
YEARLY GENERAL CONDITION OF BLOWER SYSTEM	Fan Operational Discharge piping clear of obstruction No ail intakes within 25 feet Comments or Corrective Actions <u>Benui</u>	ons	an Not Operational Discharge piping obstructions Air intakes present within 25 feet					
YEARLY FAILURE ALARM ACTIVATED SINCE PRIOR INSPECTION	Yes No							
YEARLY EXHAUST SYSTEM MAINTENANCE OR SHUTDOWN SINCE PRIOR INSPECTION	Yes No	🔲 Plan	ned					
RESPONSE REQUIRED								
WORK COMPLETED								
RESPONSE CONTRACTOR	Work Completed By: Date: Signature:							

Annual System Inspection

- Primary SSDS
- Secondary SSDS
- Monthly Inspection Review
- Cap Insepction
- Annual Report



Thank you!

Denise A. Sullivan, P.E. <u>denise@ugenv.com</u> phone: 410-244-7215 David Sena <u>david@ugenv.com</u> phone: 410-244-7215