NTC2018 - LNAPL Review September 10, 2018



Based on ITRC Guidance Document:

Light Non-Aqueous Phase Liquid (LNAPL) Site Management: LCSM Evolution, Decision Process, and Remedial Technologies (LNAPL-3, 2018)

3-Part Training Series: Connecting the Science to Managing Sites



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Part 1: Understanding LNAPL Behavior in the Subsurface

Part 2: LNAPL Conceptual Site Models and the LNAPL Decision Process

Part 3: Using LNAPL Science, the LCSM, and LNAPL Goals to Select an LNAPL Remedial Technology

Sponsored by: Interstate Technology and Regulatory Council (<u>www.itrcweb.org</u>) Presented by: Randy Chapman, Co-Team Lead – LNAPL Update

Interstate Technology & Regulatory Council (ITRC)



Host organization



• Network

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- State regulators
 - All 50 states, PR, DC
- Federal partners



 ITRC Industry Affiliates Program



- Academia
- Community stakeholders

- ITRC materials available for your use
- Available from www.itrcweb.org
 - Technical and regulatory guidance documents
 - Online and classroom training schedule
 - More...

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Our Focus is on LNAPL (Light Non-Aqueous Phase Liquid)





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► What is LNAPL?

- Why Do We Care About LNAPL?
 - LNAPL Concerns
 - LNAPL can be difficult to accurately assess or recover
- Use LNAPL science to your advantage and apply at your sites

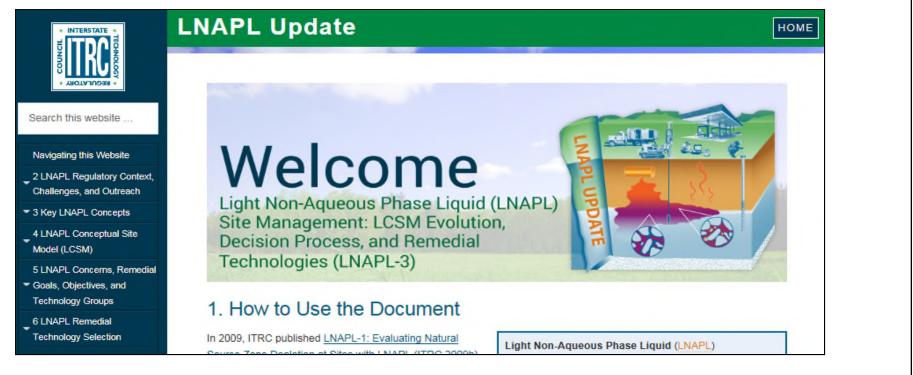
ITRC's History as LNAPL Solution Provider



- 2009: LNAPL-1 (Natural Source Zone Depletion) and LNAPL-2 (Evaluating LNAPL Remedial Technologies)
- **2010 2017**:

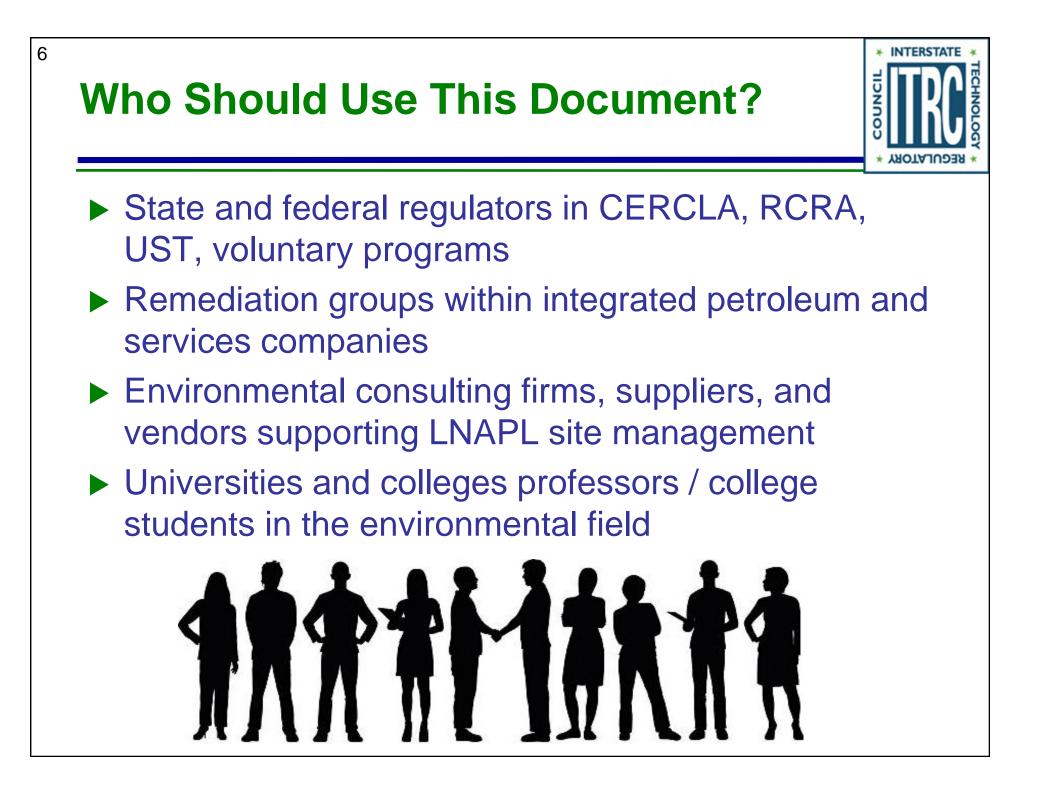
- LNAPL Online Training (3-parts)
- LNAPL Classroom Training
- Over 19,000 Trained
- 2016 2018: ITRC LNAPL Update
- March 2018: LNAPL-3 (LNAPL Site Management: LCSM Evolution, Decision Process, and Remedial Technologies)
- Spring 2018: Updated 3-Part LNAPL Online Training

Your Online LNAPL Resource https://lnapl-3.itrcweb.org/



INTERSTATE

- Expansion of LNAPL Key Concepts
- Development of a LNAPL Conceptual Site Model (LCSM) Section
- Emphasis on identifying SMART objectives
- Expansion of Transmissivity (Tn) and Natural Source Zone Depletion (NSZD) via Appendices



Where Does This ITRC LNAPL Document Apply?

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From large terminals or bulk storage facilities to your "mom and pop" corner gas station The SCIENCE is the same.

Learning Objectives 3-Part Training Series



Part 1	Use LNAPL science to your advantage and apply at your sites
Part 2	 Develop LNAPL Conceptual Site Model (LCSM) for LNAPL concern identification Inform stakeholders about the decision-making process
Part 3	 Select remedial technologies to achieve objectives Prepare for transition between LNAPL strategies or technologies as the site moves through investigation, cleanup, and beyond "SMART"-ly measure progress toward an identified technology-specific endpoint

ITRC 3-Part Online Training Leads to YOUR Action

Part 1: Connect Science to LNAPL Site Management

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(Section 3)

Part 2: Build Your LNAPL Conceptual Site Model

(Sections 4 and 5) Part 3: Select / Implement LNAPL Remedies (Section 6)

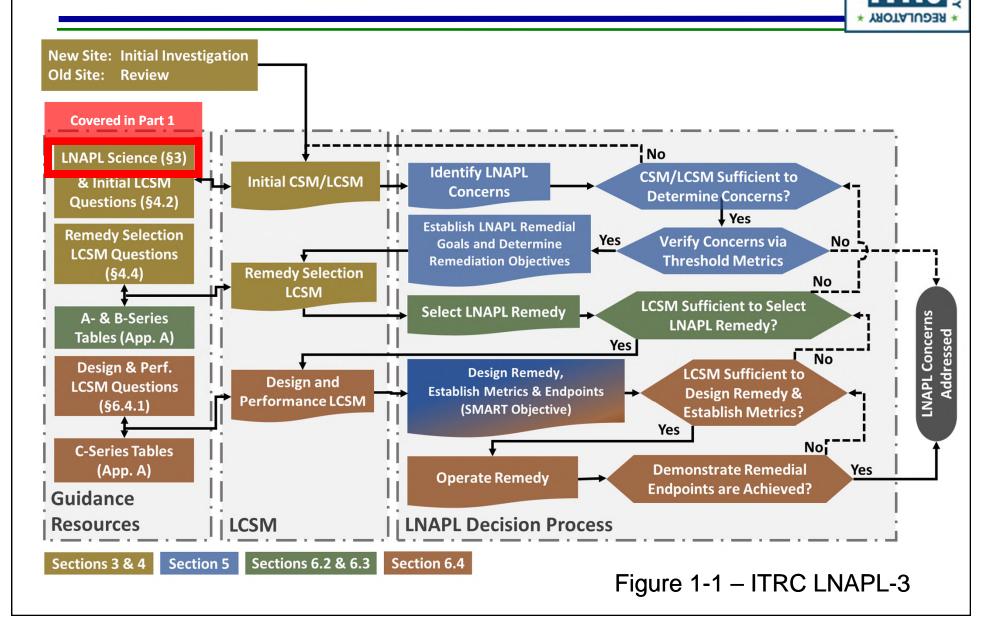
YOU Apply knowledge at your LNAPL sites

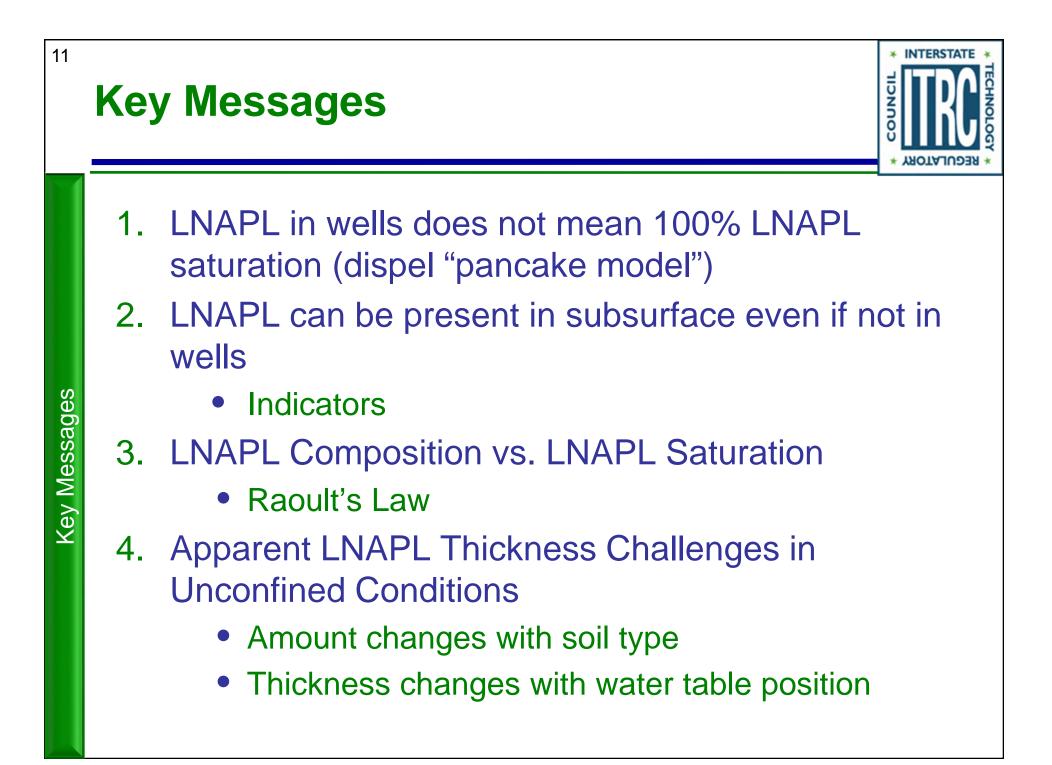
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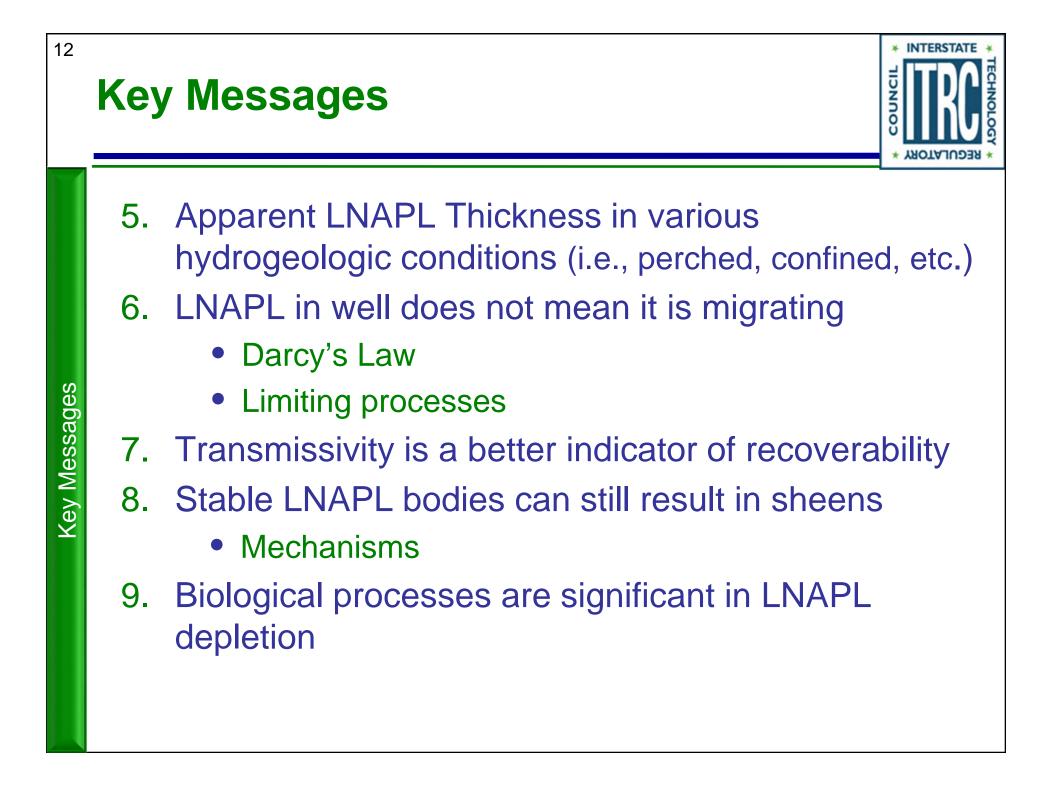
Based on the ITRC LNAPL-3 Document: LNAPL Site Management: LCSM Evolution, Decision Process, and Remedial Technologies

LNAPL Remediation Process and Evolution of the LCSM – Related to the Training Courses

INTERSTATE







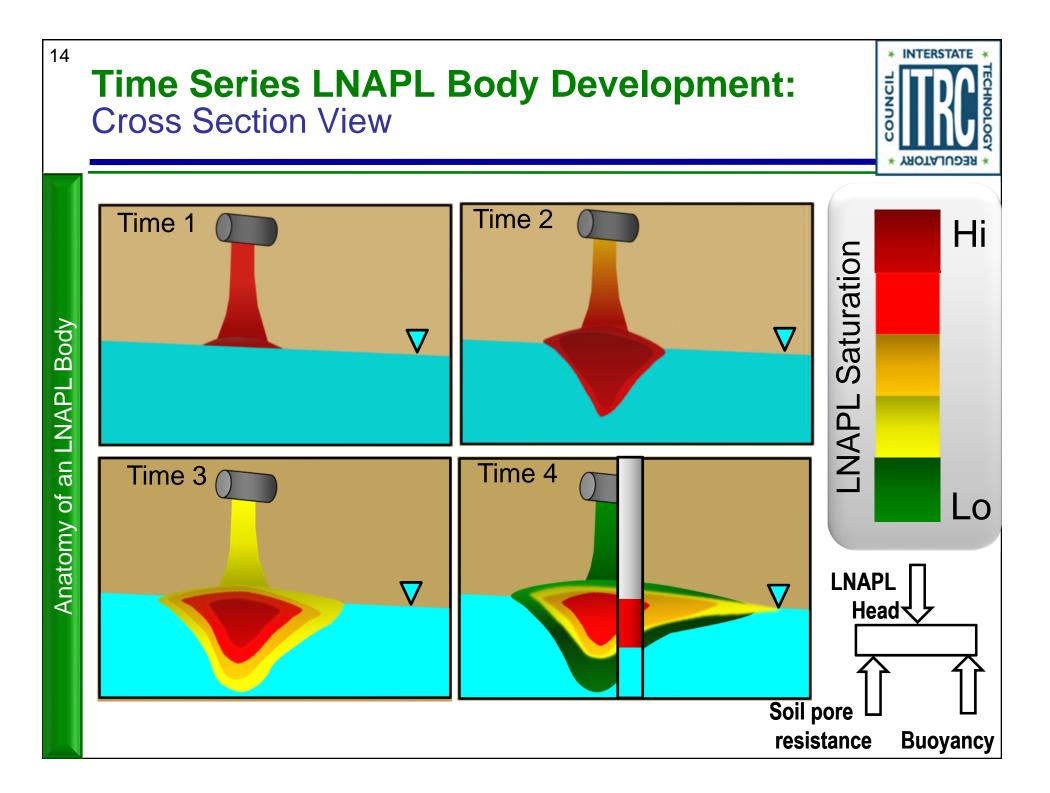


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Groundwater and LNAPL share pore space LNAPL in MWs \neq 100% LNAPL Saturation in Formation





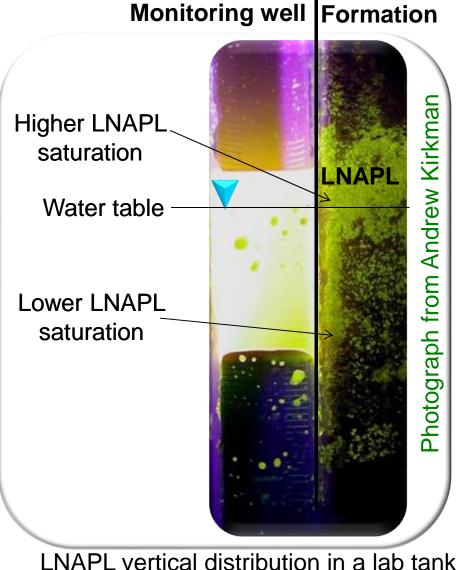
Impacts of LNAPL in the Formation: Key Messages

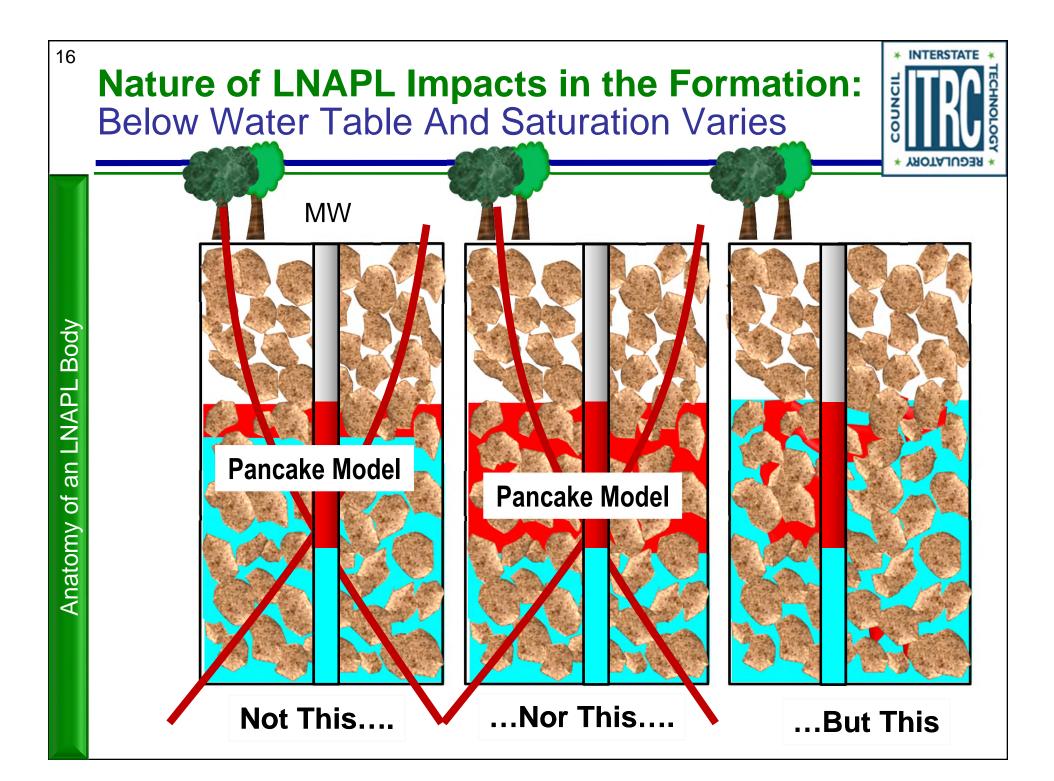


LNAPL penetrates below the water table

- LNAPL saturation in the formation is not 100% and varies with depth
 - LNAPL shares the pore space with water

Coming Next: How to determine LNAPL is there and how much



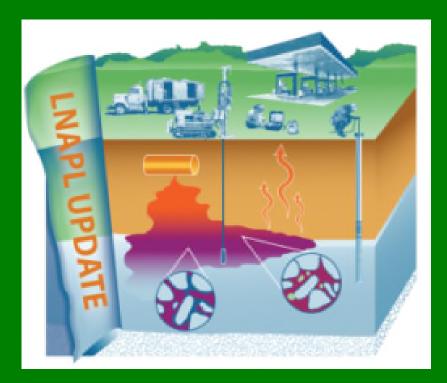




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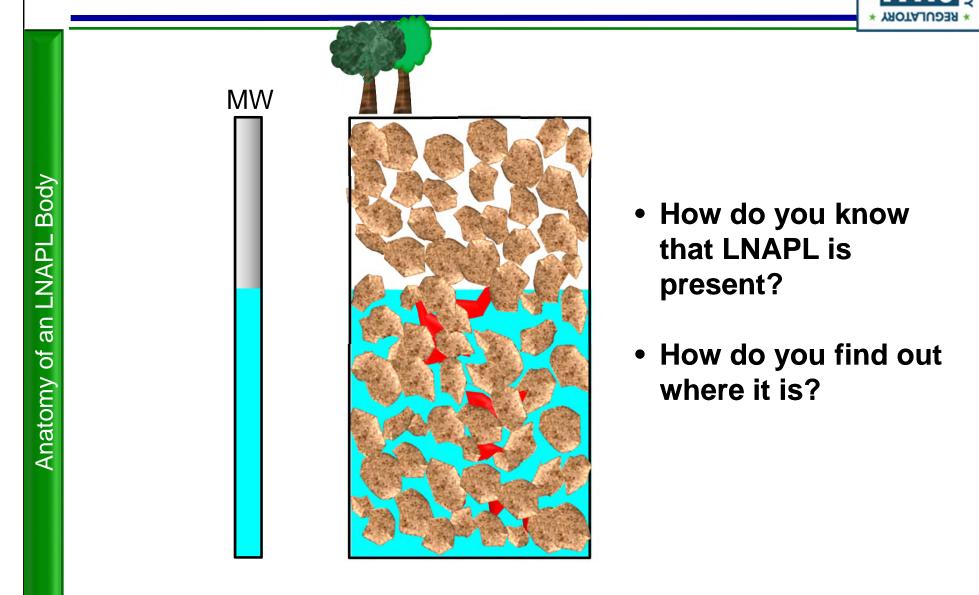


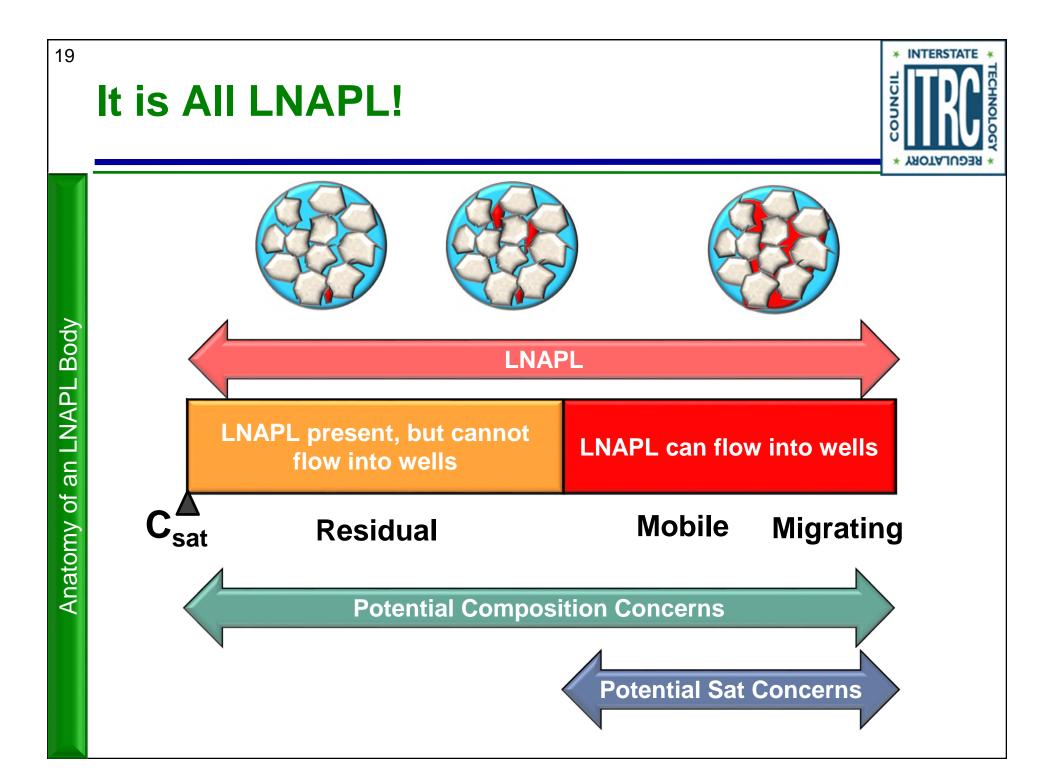
LNAPL can be in the formation even when it is not accumulating in a well

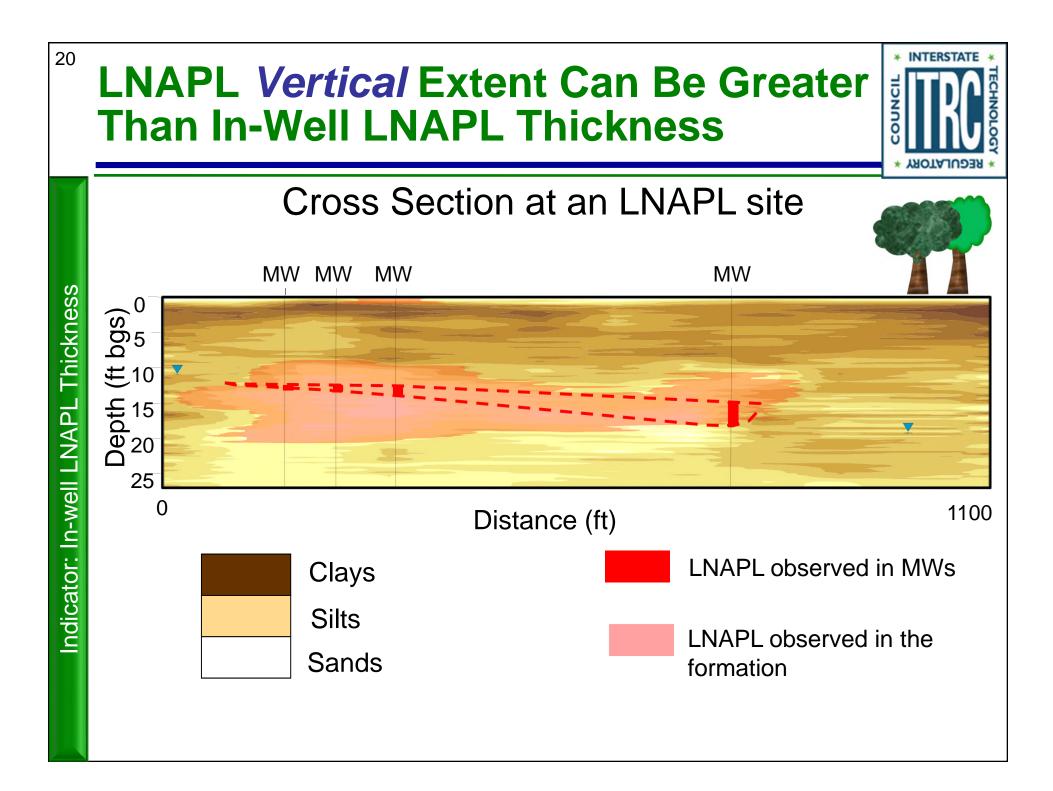


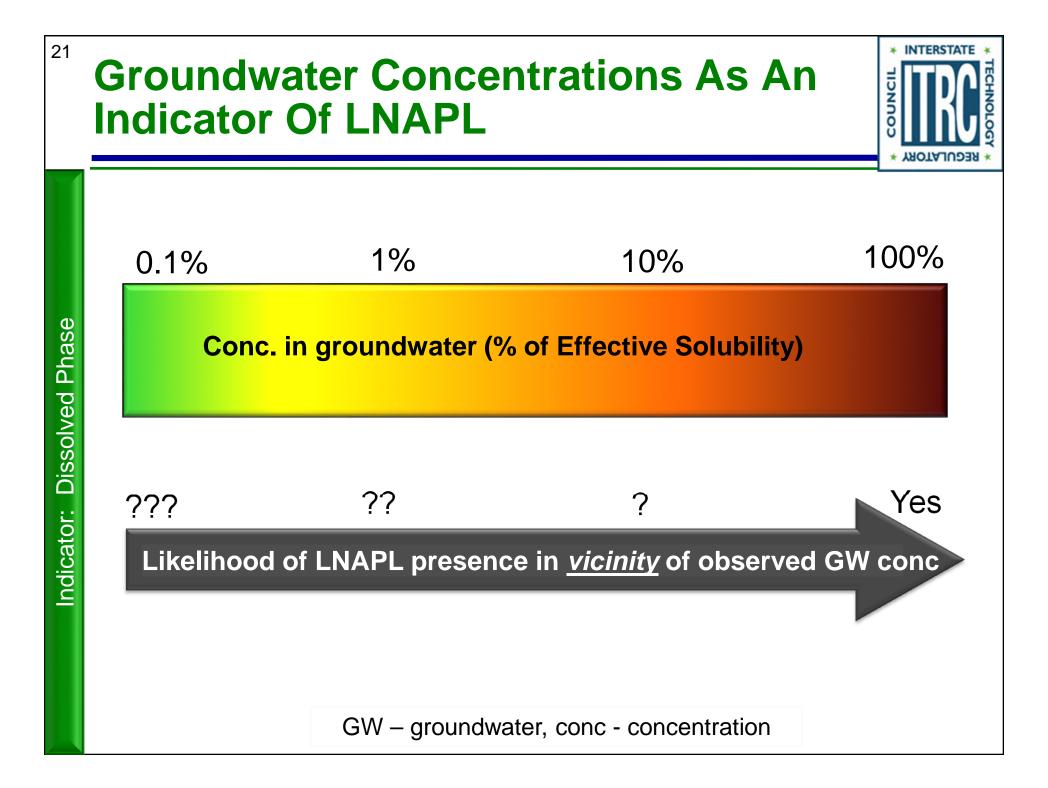
Nature of LNAPL Impacts in the Formation: LNAPL May Not Even Flow Into A Well

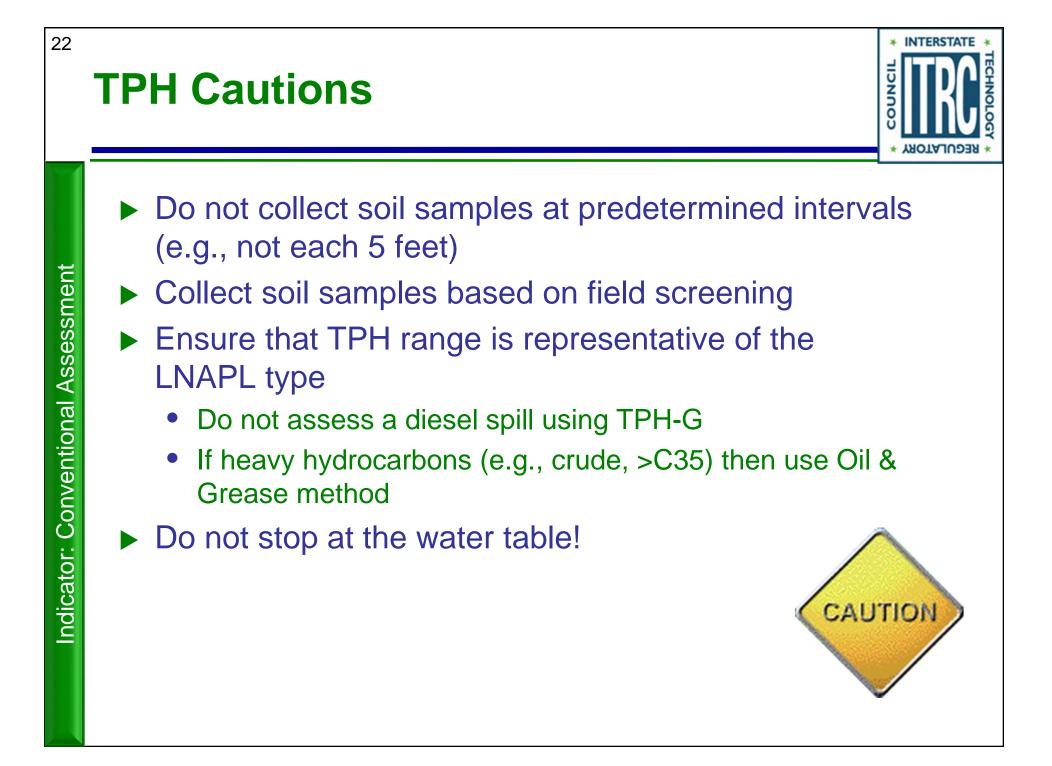
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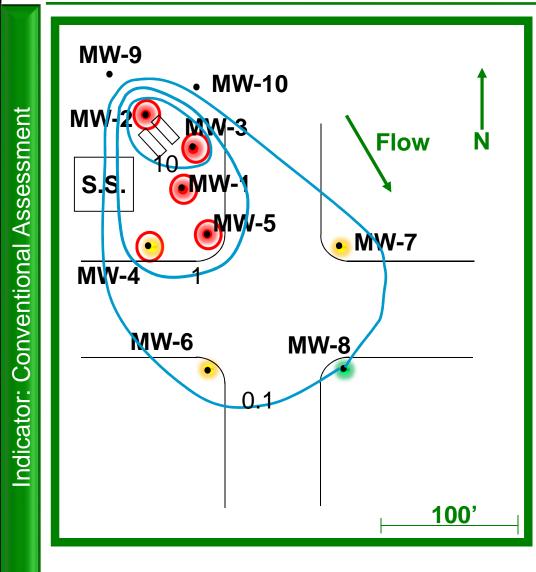






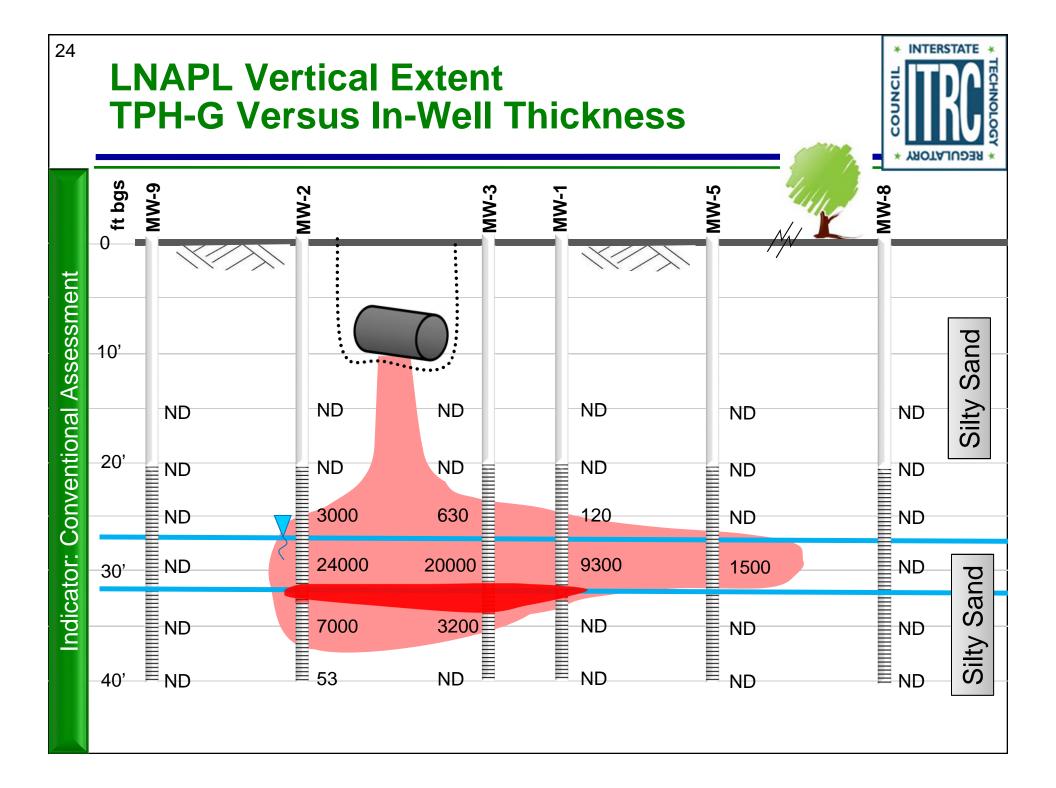
Inferring LNAPL from Soil TPH Concentrations





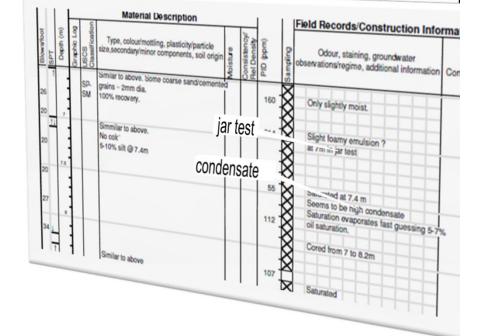
MW	Historical Benzene Concs (mg/L)	<i>Maximum</i> Soil TPH Concs (mg/Kg)	
1	5	9300	
2	13	24000	
3	15	20000	
4	1.6	1700	
5	3.4	1500	
6	0.6	12	
7	0.35	10	
8	0.1	ND<0.005	
9	ND<0.001	ND<0.005	
10	ND<0.001	ND<0.005	

LNAPL present – MW-1, -2, -3, -4, -5



OVA and Other Field Observations

- Boring logs to characterize LNAPL source zone geometry
 - Lithology, water content, stain, odor, OVA readings



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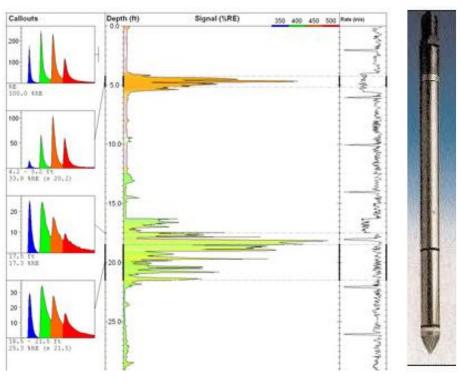
- Shake test
- Oleophyllic dyes for presence of LNAPL
 - Detection +/- 1000 ppm TPH

Picture cheiron-resources.com

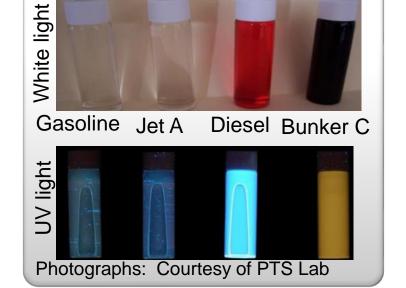
Fluorescence of LNAPL



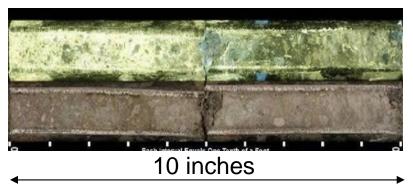
- All that fluoresces may not be LNAPL
 - Minerals, antifreeze, detergents, peat
- All LNAPLs do not fluoresce



Laser Induced Fluorescence



Laboratory Core UV Photograph



Indicator: Specialized Assessment

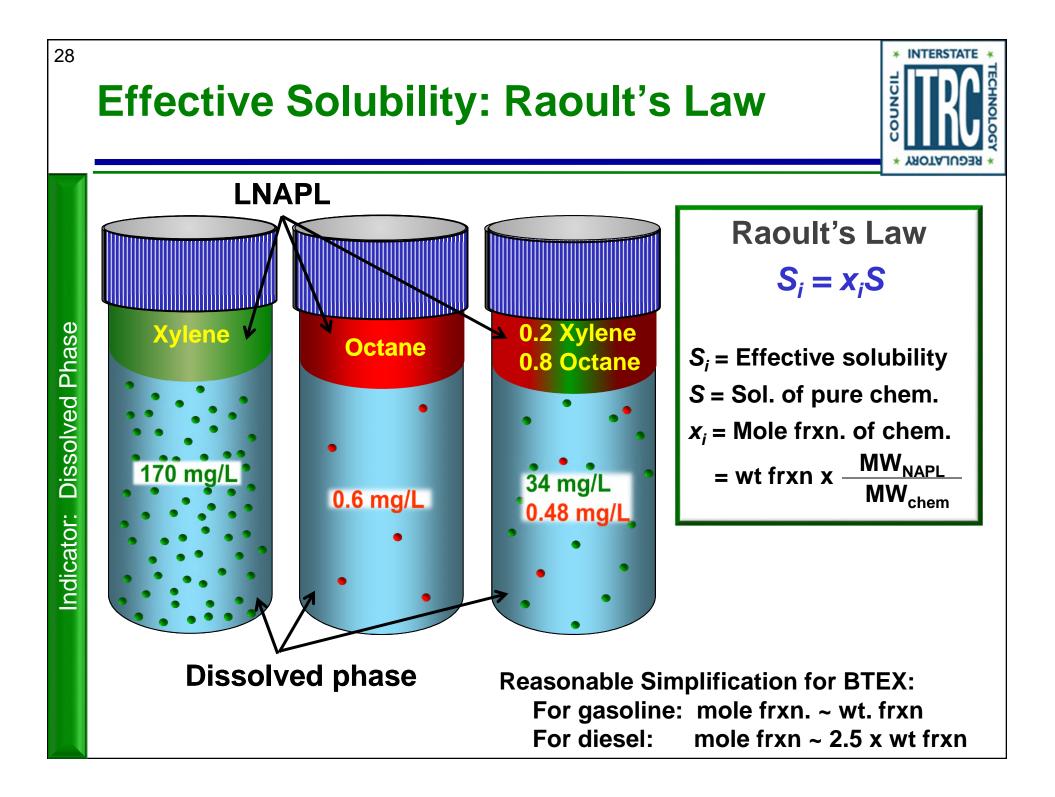


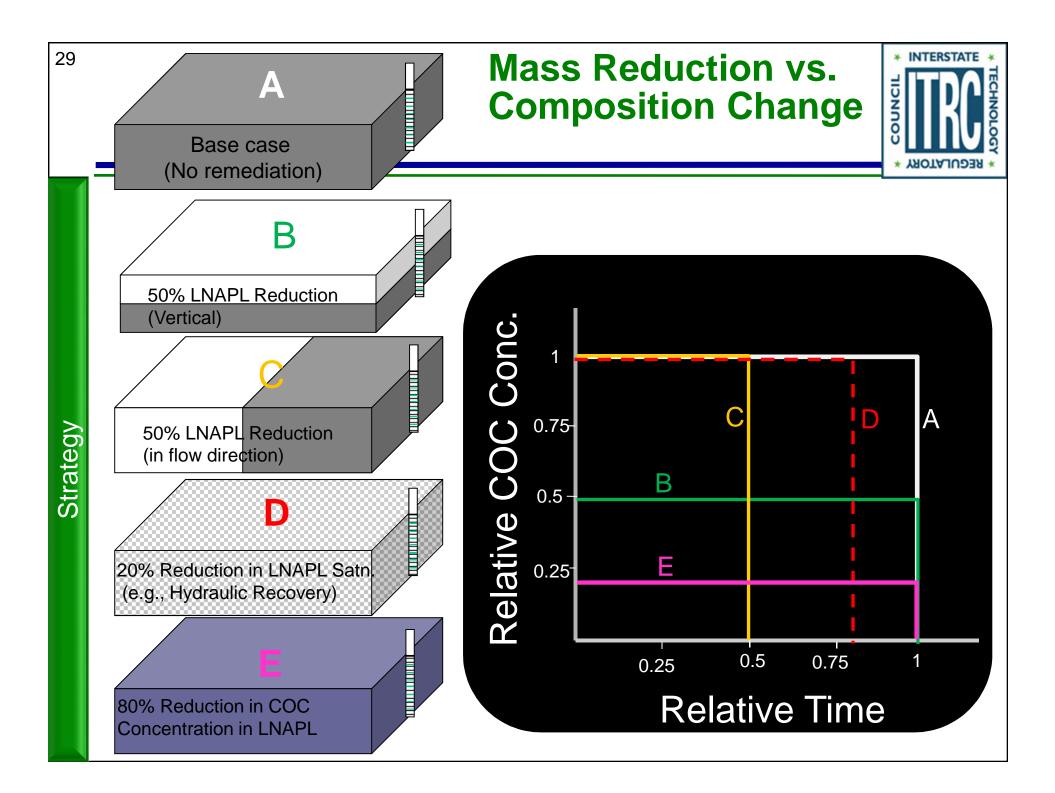
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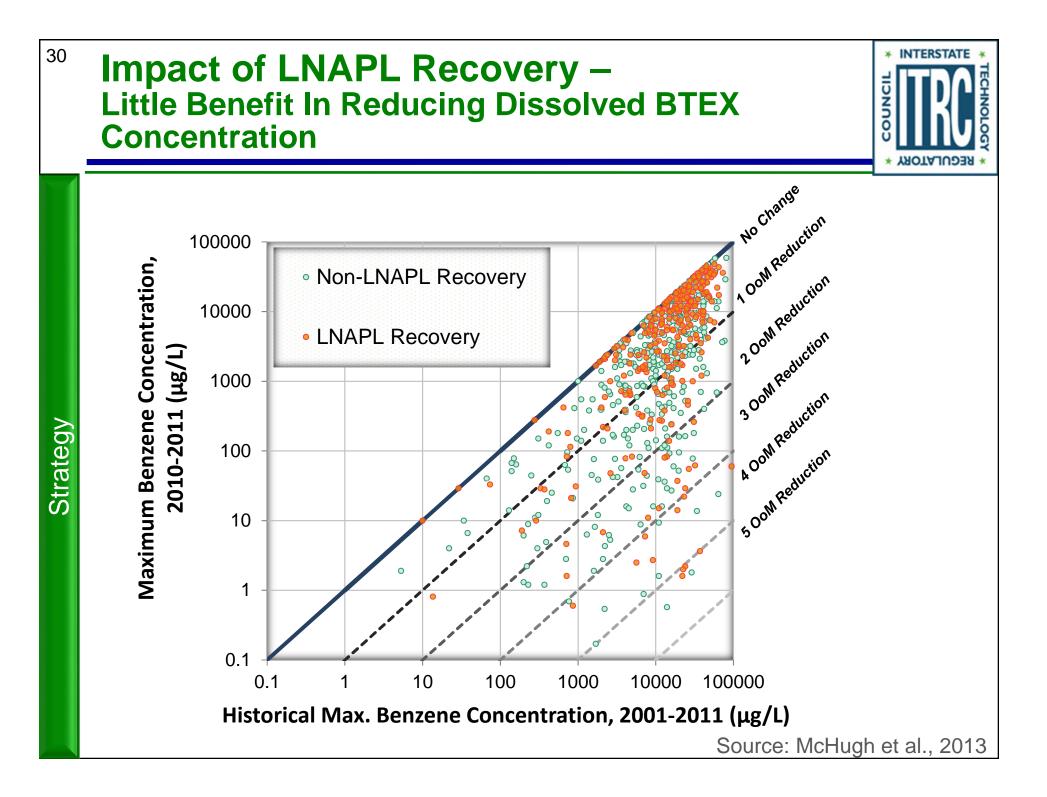


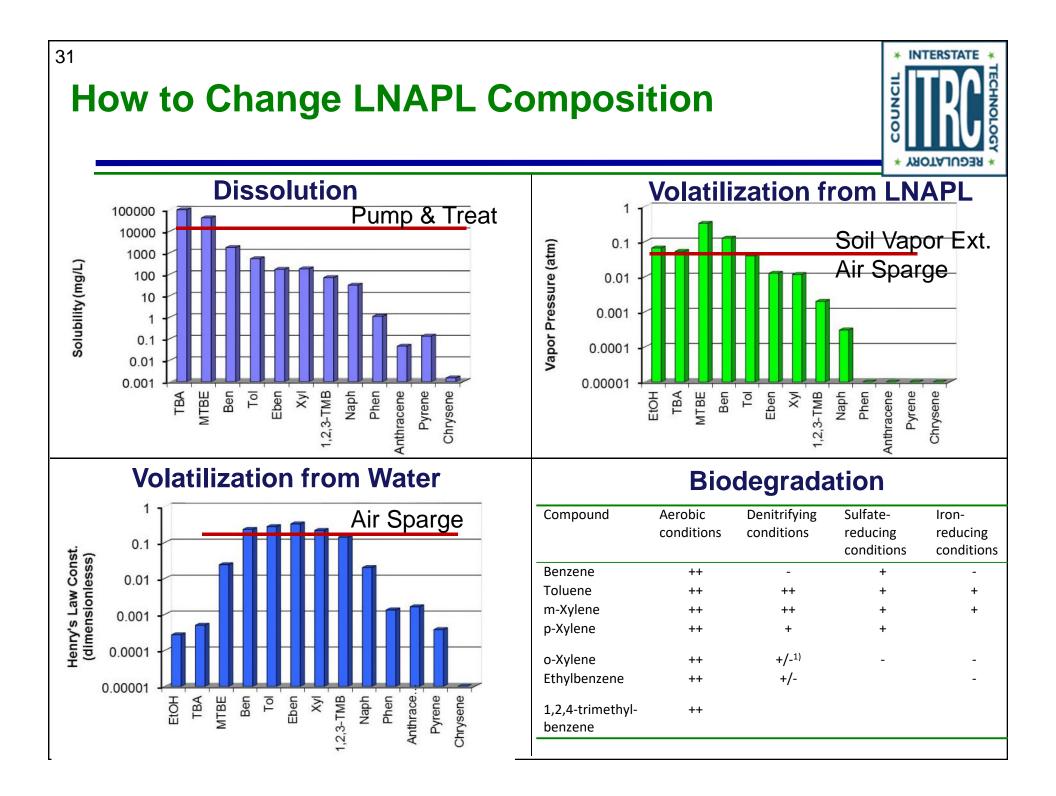
LNAPL Saturation vs. Composition

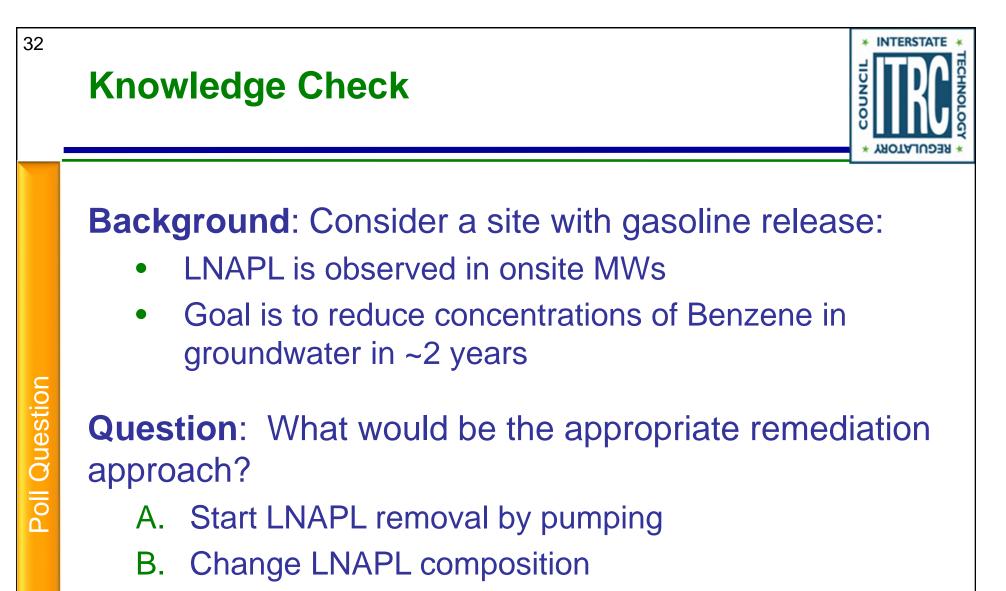










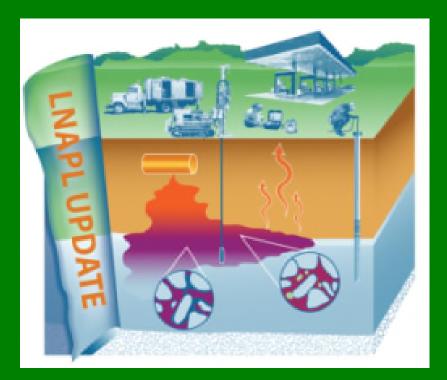


C. Let Monitored Natural Attenuation take its course



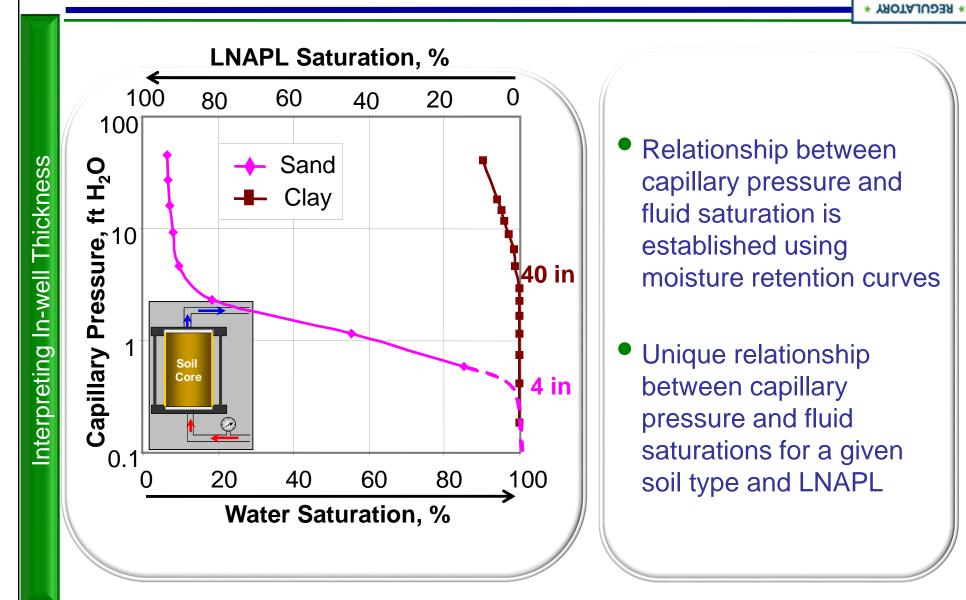


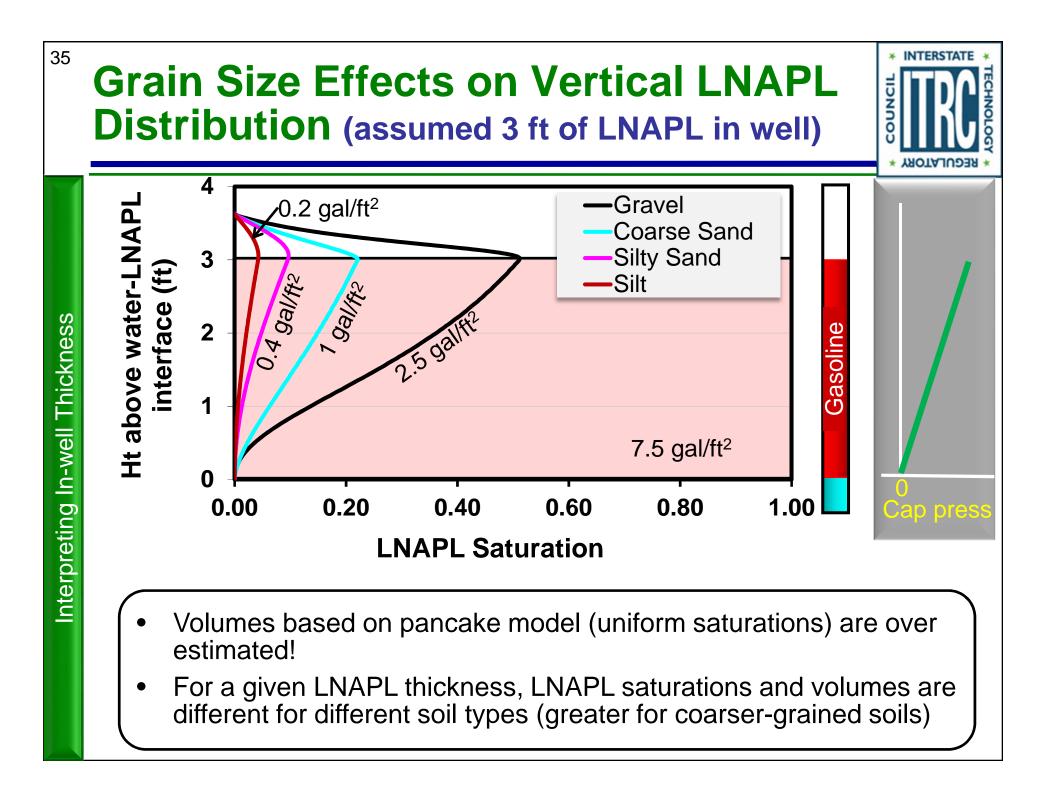
ALL Apparent LNAPL Thicknesses are not created equal!

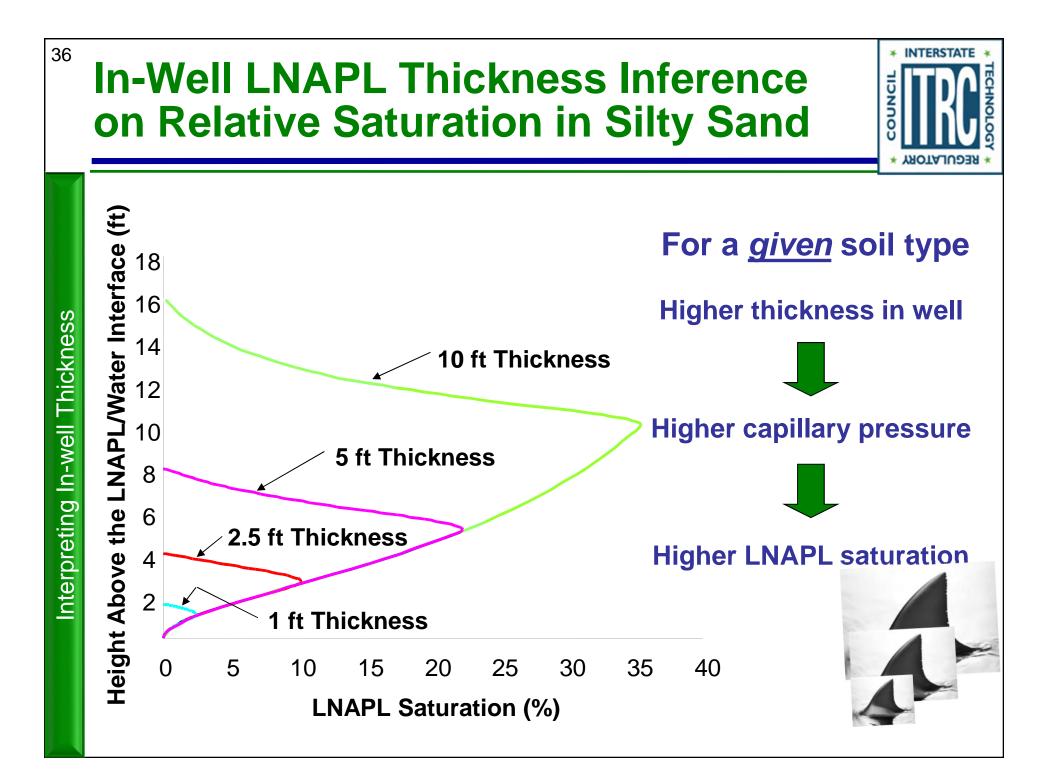


Apparent LNAPL Thicknesses in Unconfined Conditions

³⁴ **Moisture Retention Curves:** Relate Capillary Pressure & Fluid Saturation

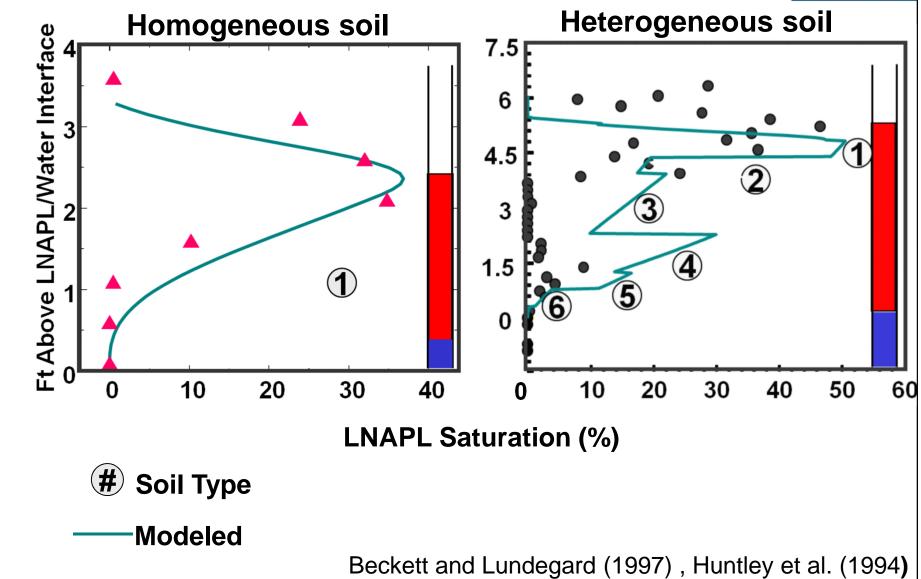






Measured and Modeled Equilibrium LNAPL Saturations





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Interpreting In-well Thickness

Key Message 5



ALL Apparent LNAPL Thicknesses are not created equal!

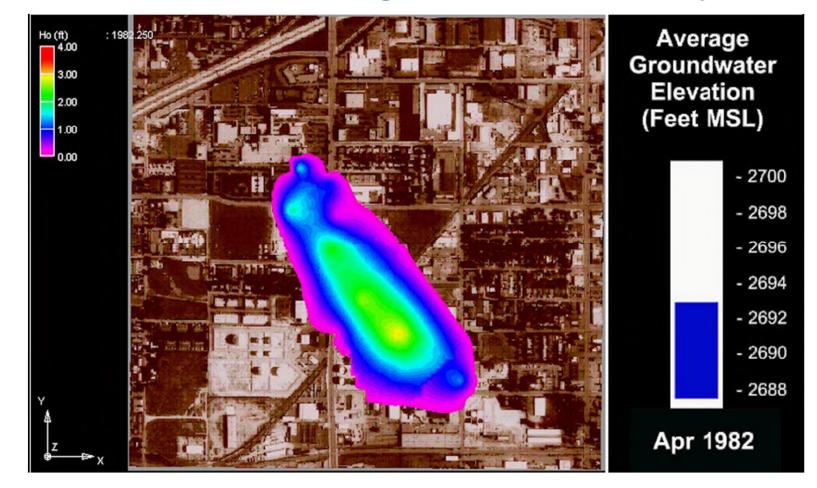


Apparent LNAPL Thicknesses in Various Hydrogeologic Conditions

Example Seasonal LNAPL Redistribution



LNAPL Monitoring Over Time - Refinery

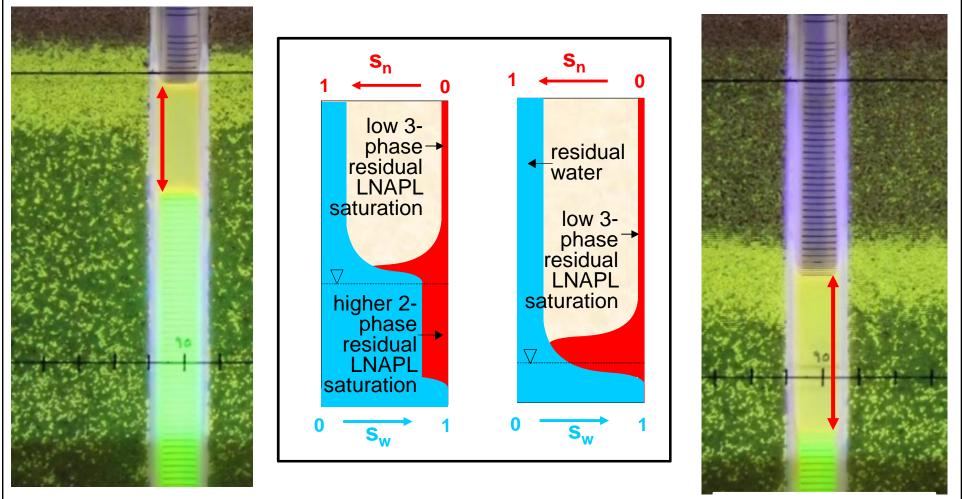


From API Interactive NAPL Guide, 2004

40 INTERSTATE **Example Seasonal LNAPL** Redistribution **LNAPL Monitoring Over Time - Refinery High Water High Water** Low Water Low Water evel Sept 1982 **Oct 1984 April 1982 April 1983** Water Challenges Apr 1983 **High Water** Low Water Low Water Sept 1986 **April 1985 April 1987** Conceptual From API Interactive NAPL Guide, 2004

- Measured LNAPL Depth in Monitoring Wells: 0 to 3 feet
- Seasonal Water Table Variation: 8 foot range

LNAPL Thickness change with water table fluctuation (sand tank study)

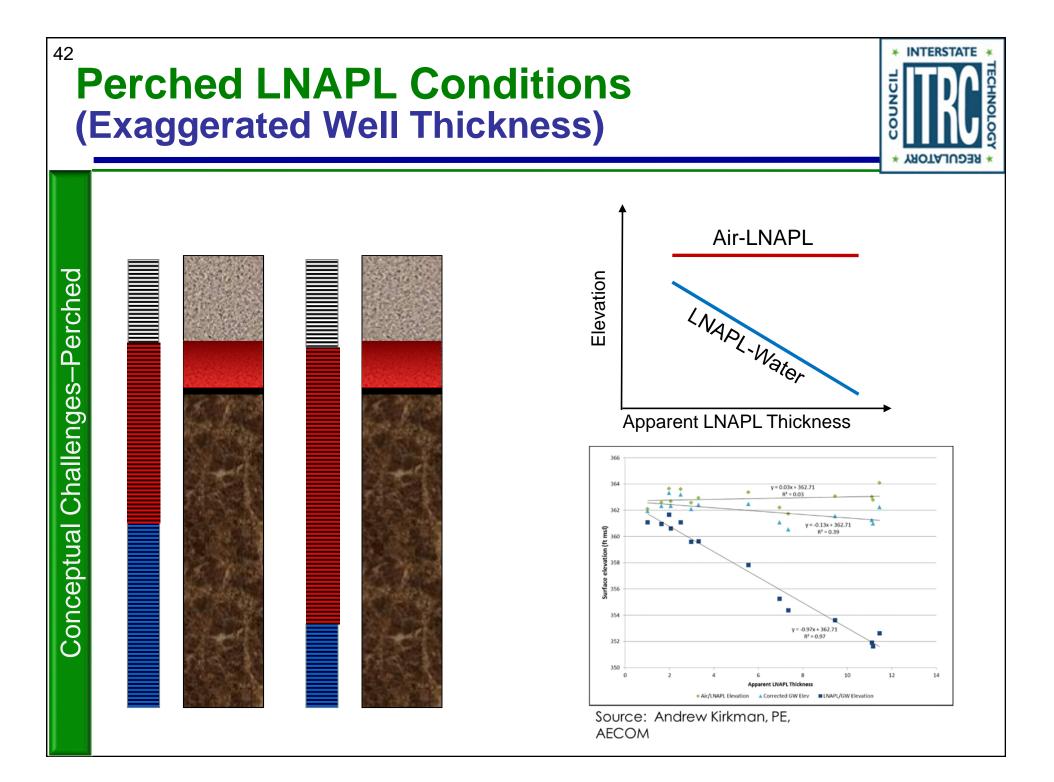


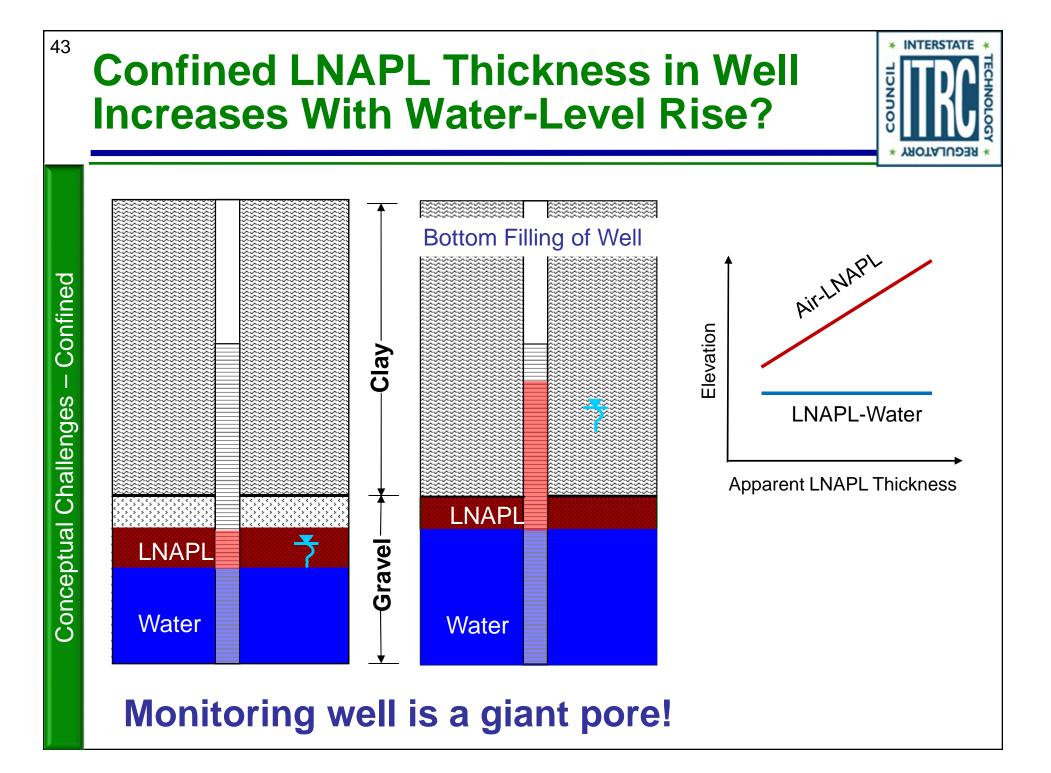
High water table

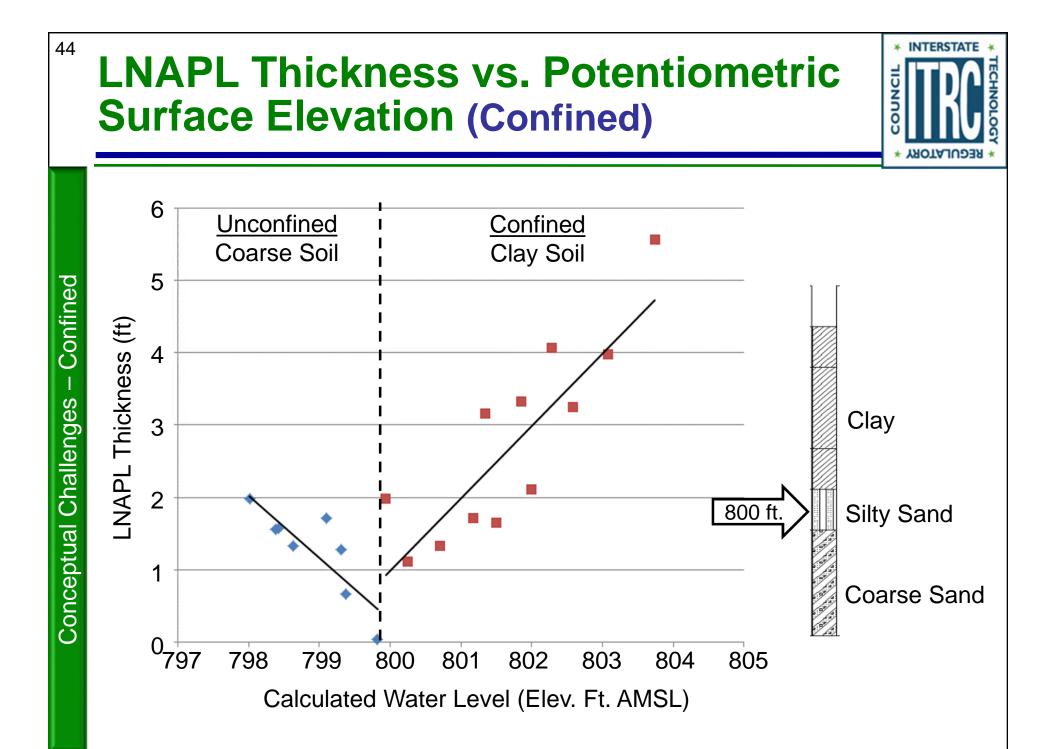
Low water table

INTERSTATE

Tank Photo From Alison Hawkins (CSU), graduate student of Dr. Tom Sale



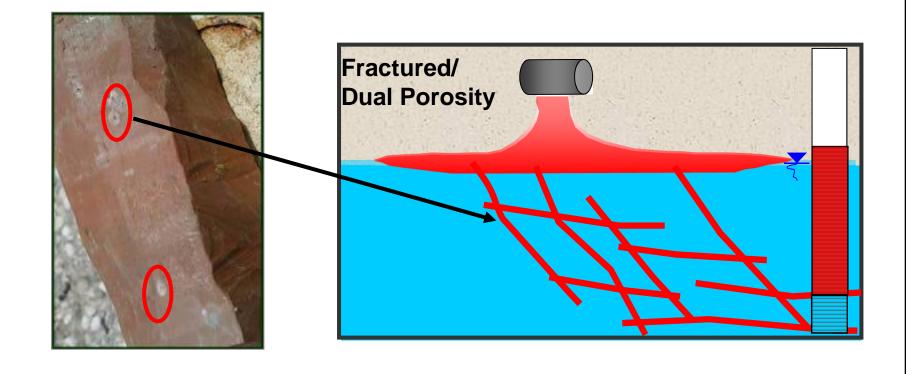




Fractured and Preferential Pathway Conditions



LNAPL that is confined in a large pore network that is defined by capillary pressure contrast e.g., open fractures, sand surrounded by clay, macropores



Why Identifying Hydrogeologic Condition of LNAPL Occurrence Important

- Minimizes or exaggerates LNAPL thickness in wells relative to LNAPL thickness in formation
- Volume estimates modeling and recovery system implications
- Recovery can decrease while LNAPL thickness is constant
- Understanding LNAPL migration pathways
- Development of effective LNAPL remedial strategy
 - Identify zones to target for LNAPL remediation
 - Critical for identifying appropriate LNAPL remediation technology
- Recovery rate constant for perched controlled by rate draining off the perching layer (lowering water table won't help)



Knowledge Check



Background: A site has 7 ft. of LNAPL in a well. After a heavy rainfall season, the LNAPL thickness increases to 9 ft.

Question: Which of these is likely to be correct?

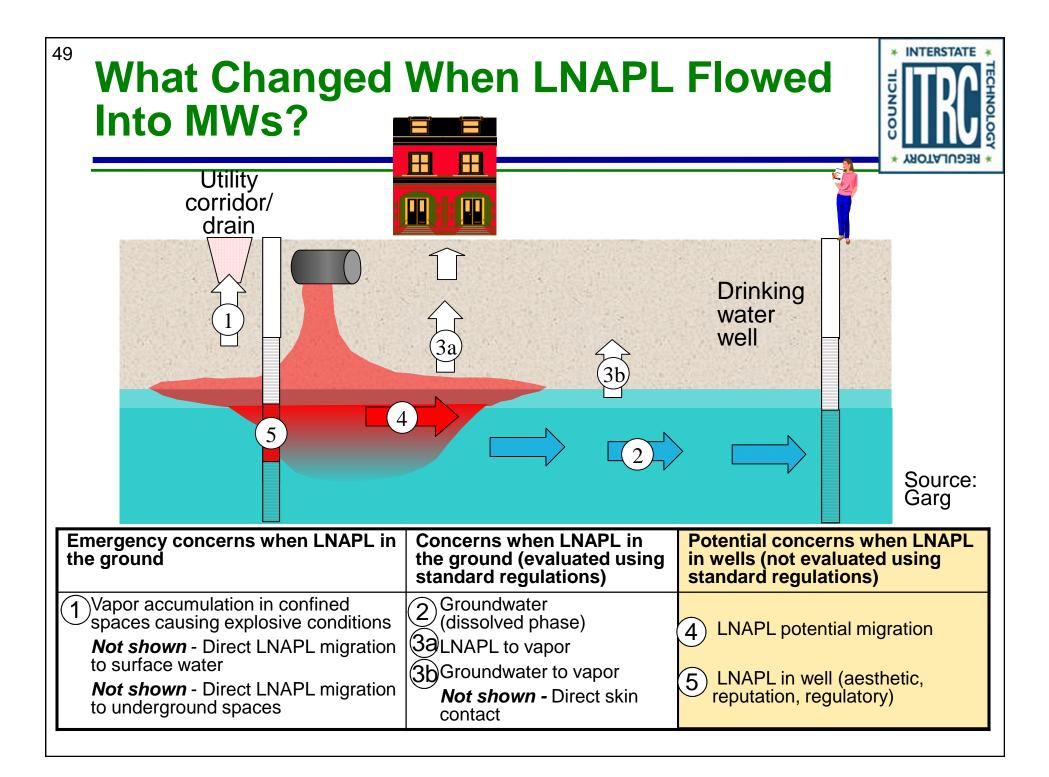
- A. LNAPL is unconfined
- B. LNAPL is perched
- C. LNAPL is confined
- D. LNAPL is moving/migrating





Mobile LNAPL does not necessarily mean that the LNAPL is migrating





Darcy's Law for LNAPL

Darcy's Law governs fluid flow in a porous media

• q = K i

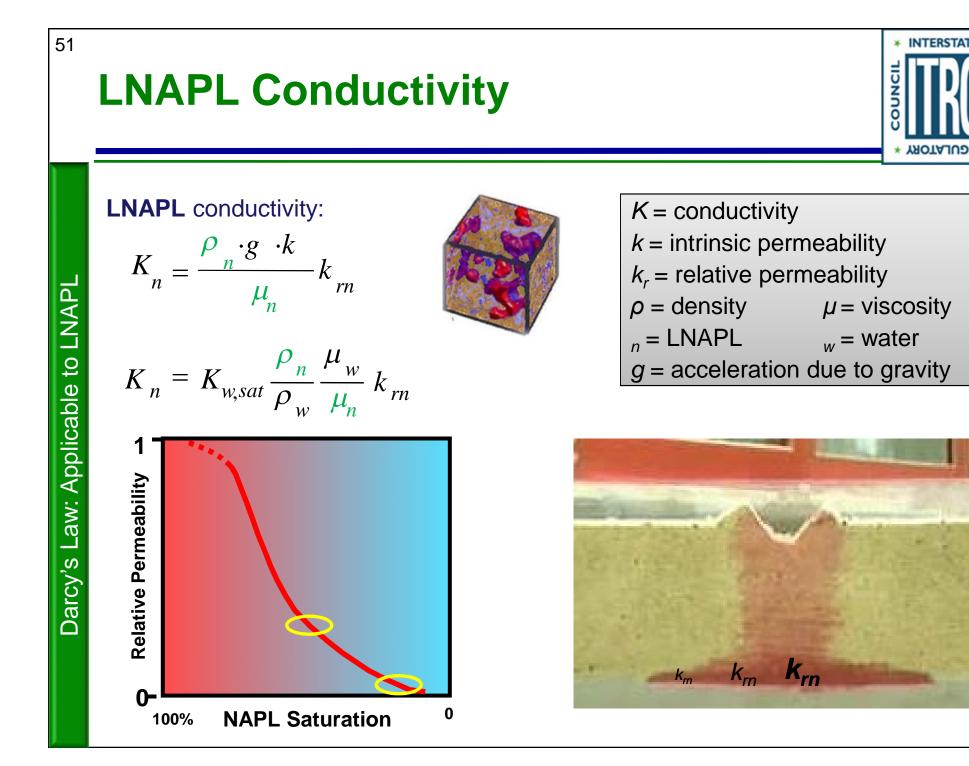
- In a water / LNAPL system, not just dealing with a single fluid (groundwater or LNAPL)
- Darcy's Law applicable to each fluid (water / LNAPL) independently

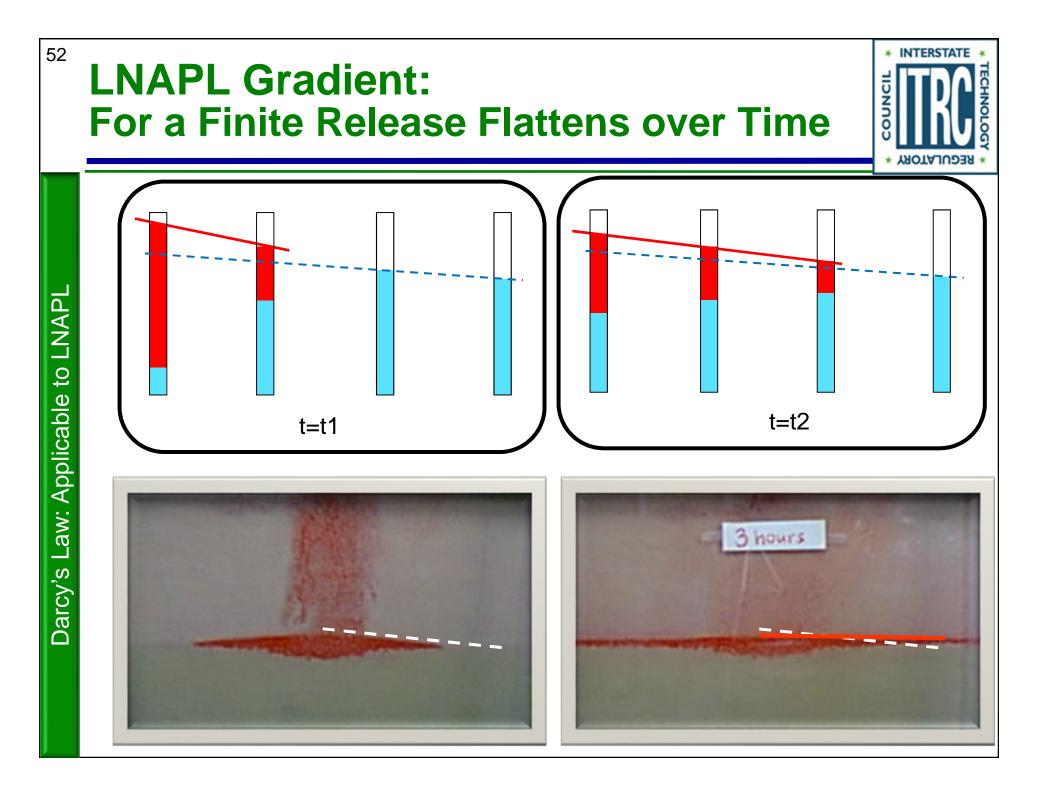
Darcy's Law for water flow: $q_w = K_w i_w$ Darcy's Law for LNAPL flow: $q_n = K_n i_n$



- q = Darcy flux (L/T)
- K =fluid conductivity (L/T)
- i = gradient
- $_{w}$ = water

Will next look at LNAPL conductivity (K_n) and LNAPL gradient (i_n)

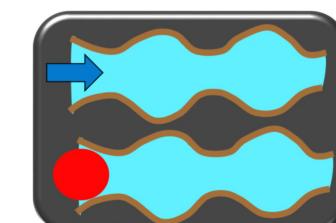




Pore Entry Pressure: LNAPL Behavior

- Similar behavior when LNAPL tries to enter pores with pre-existing fluids
 - Fluid does not encounter resistance when flowing into like (e.g., groundwater flow)
 - Soil pores less wetting to LNAPL than water: LNAPL encounters resistance
 - Soil pores more wetting to LNAPL than air: LNAPL displaces air easily
- LNAPL only moves into water-wet pores when entry pressure (resistance) is overcome
 - To distribute vertically and to migrate laterally

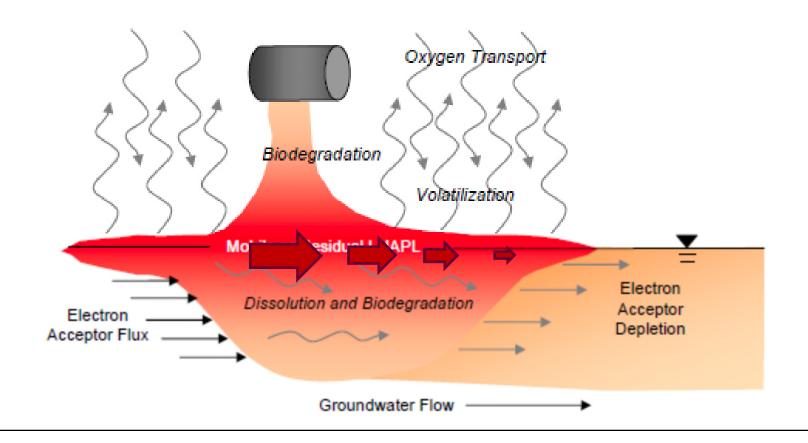
For water-wet media



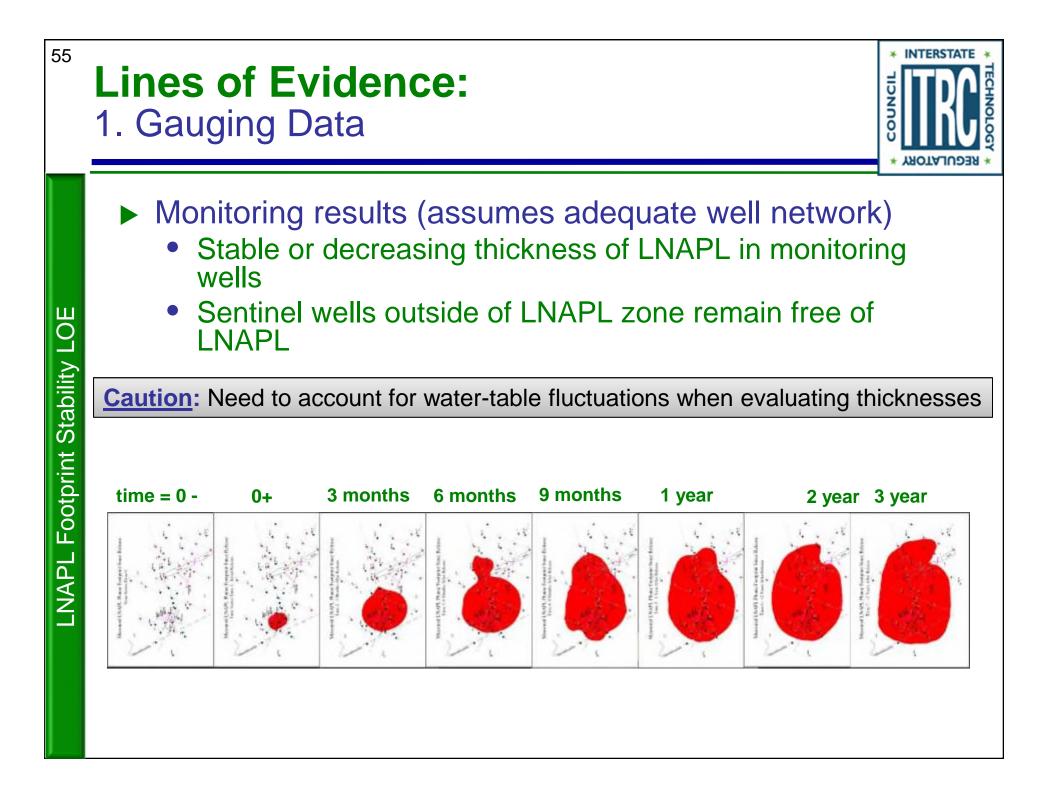
Key Point: Pore Entry Pressure is the resistance that LNAPL encounters when flowing into a pore with preexisting groundwater

⁵⁴ NSZD (Natural Source Zone Depletion) Contributes to LNAPL Stability

Rates have been measured at about 100 to 1000 gallons per year per acre (Lundegard & Johnson 2006; ITRC 2009; Sale 2011)



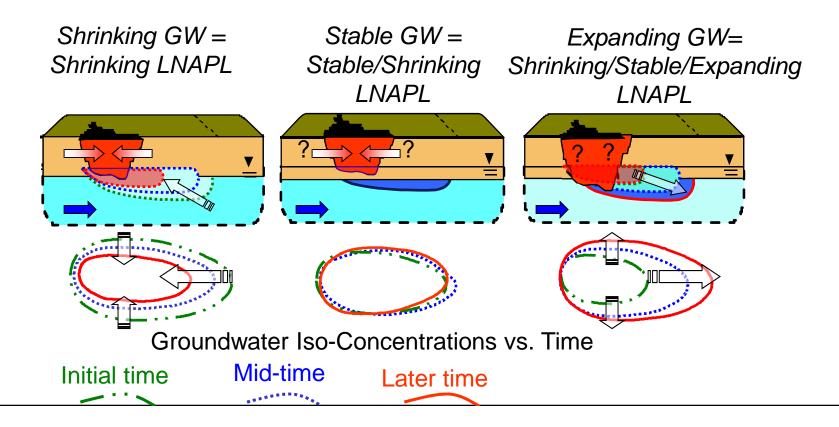
LNAPL Footprint Stability LOE



Lines of Evidence: 2. Groundwater Data

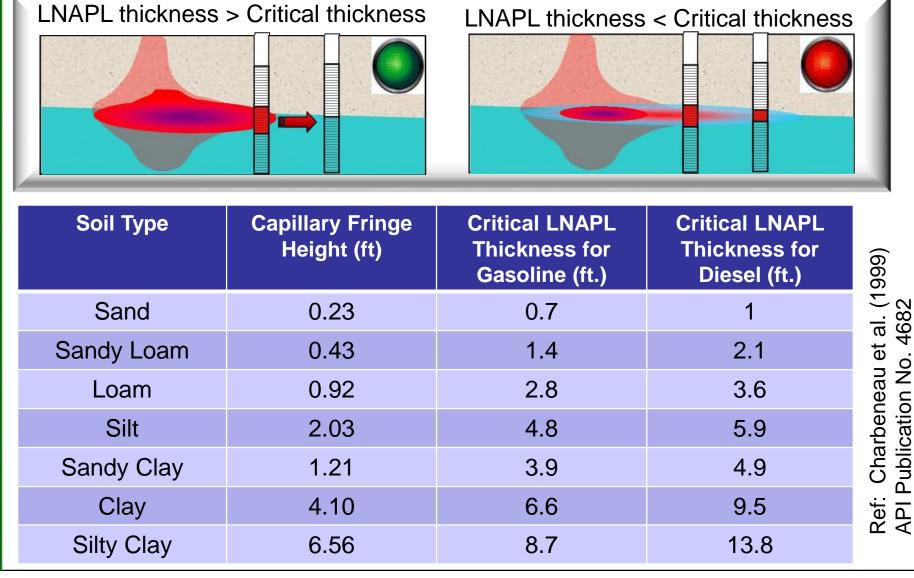
* INTERSTATE *

- Dissolved-phase plume maps
 - Characterize source area shape, size and depth
 - Assess if natural attenuation on-going
 - Shrinking/stable GW plume = shrinking/stable LNAPL body



Lines of Evidence: 3. Measured LNAPL Thickness < Critical Thickness

INTERSTATE



LNAPL Footprint Stability LOE

Other Lines Of Evidence Of LNAPL Footprint Stability



- 4. Low LNAPL Transmissivity
 - Low Kn
 - Site measurements yield average values can have higher Kn lenses
- 5. Age of the release
 - Abated release
 - Timing of release (if known)
 - Weathering indicators
- 6. Recovery rates
 - Decreasing LNAPL recovery rates
- 7. Laboratory tests
 - Saturation and residual saturation values
- 8. Tracer test
 - Measures rate of dilution of hydrophobic tracer

LNAPL Footprint Stability LOE

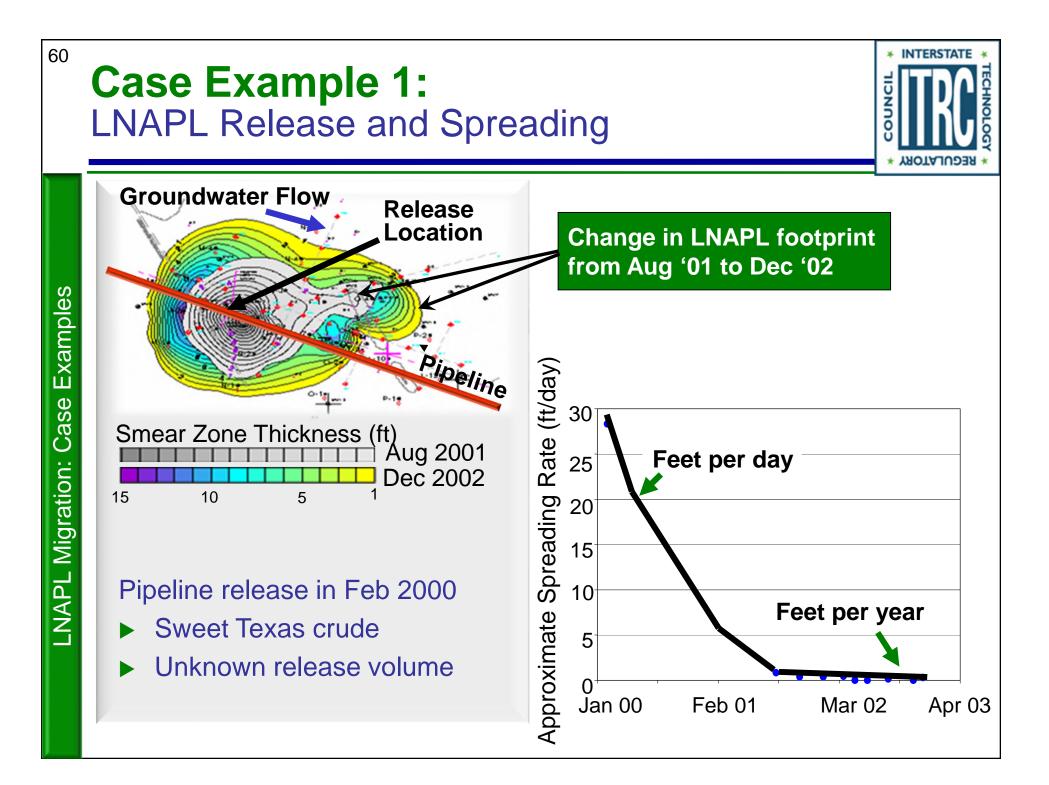
LNAPL Migration: Case Examples



What we have observed at sites:

- LNAPL can initially spread at rates higher than the groundwater flow rate due to large LNAPL hydraulic heads at time of release
- LNAPL can spread opposite to the direction of the groundwater gradient (radial spreading)
- After LNAPL release is abated, LNAPL bodies come to be stable configuration generally within a short period of time





LNAPL Migration Potential / Stability Summary



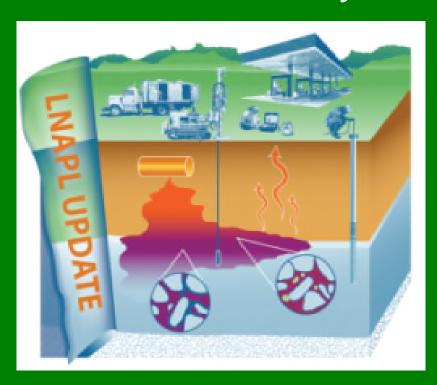
- Mobile LNAPL is not necessarily migrating LNAPL
 - In-well LNAPL does not mean it is moving
- Principles of Darcy's Law apply
 - LNAPL can spread upgradient and migrate rapidly in the early phases following a release
 - Self-limiting process, once the release is abated
- LNAPL needs to overcome pore-entry pressure to move into a water-saturated pore
- NSZD (Natural Source Zone Depletion) contributes to LNAPL stability
- Use multiple lines of evidence to assess LNAPL stability

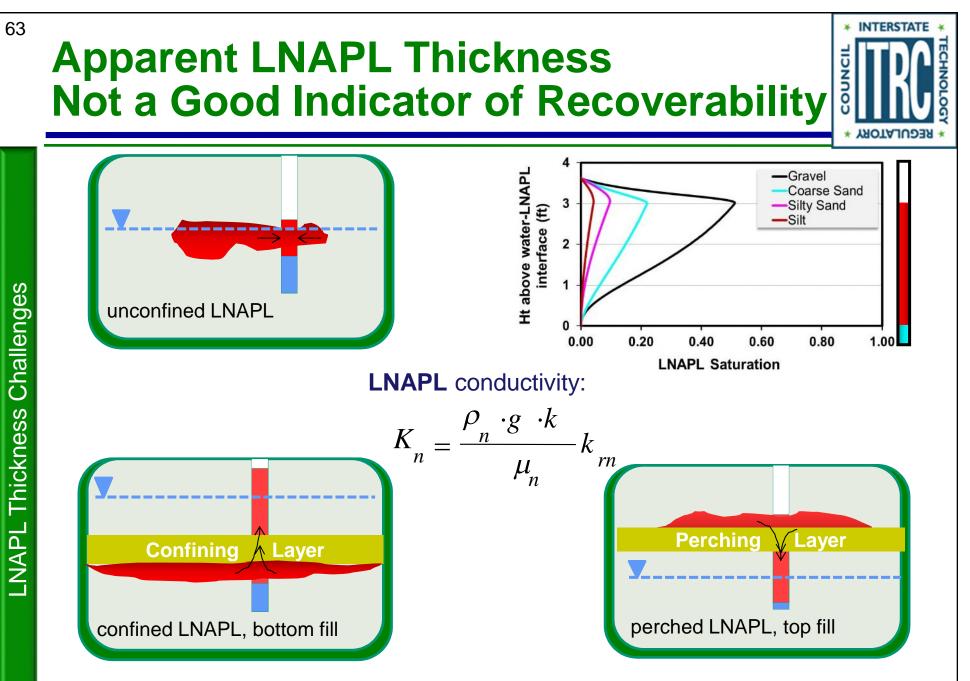


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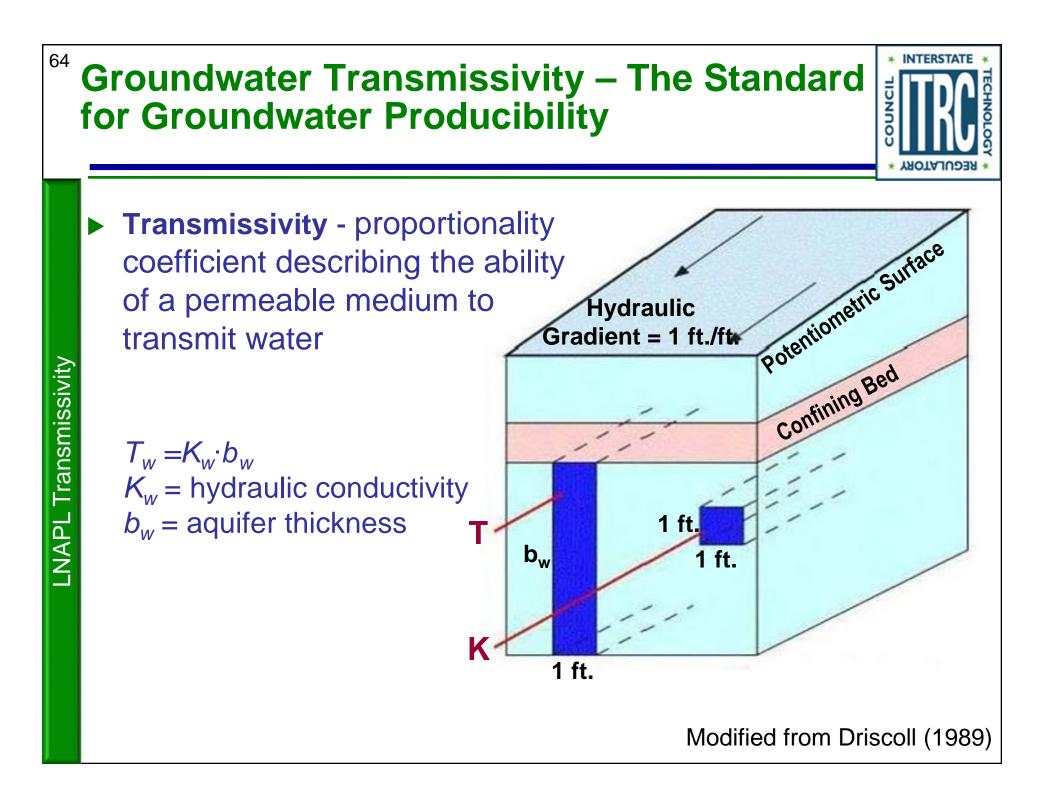


LNAPL Transmissivity is a better indicator of recoverability





Need a metric that is indicative of LNAPL recoverability!



LNAPL Transmissivity – The New Standard for LNAPL Recoverability

LNAPL Transmissivity (T_n) is a proportionality coefficient that represents the ability of a permeable medium to transmit LNAPL

$$q_n = K_n i_n$$
$$q_n b_n = K_n b_n i_n$$
$$Q_n = T_n i_n$$

T_n represents *averaged* aquifer & fluid properties (soil permeability, density, viscosity, saturation) AND thickness of mobile LNAPL interval

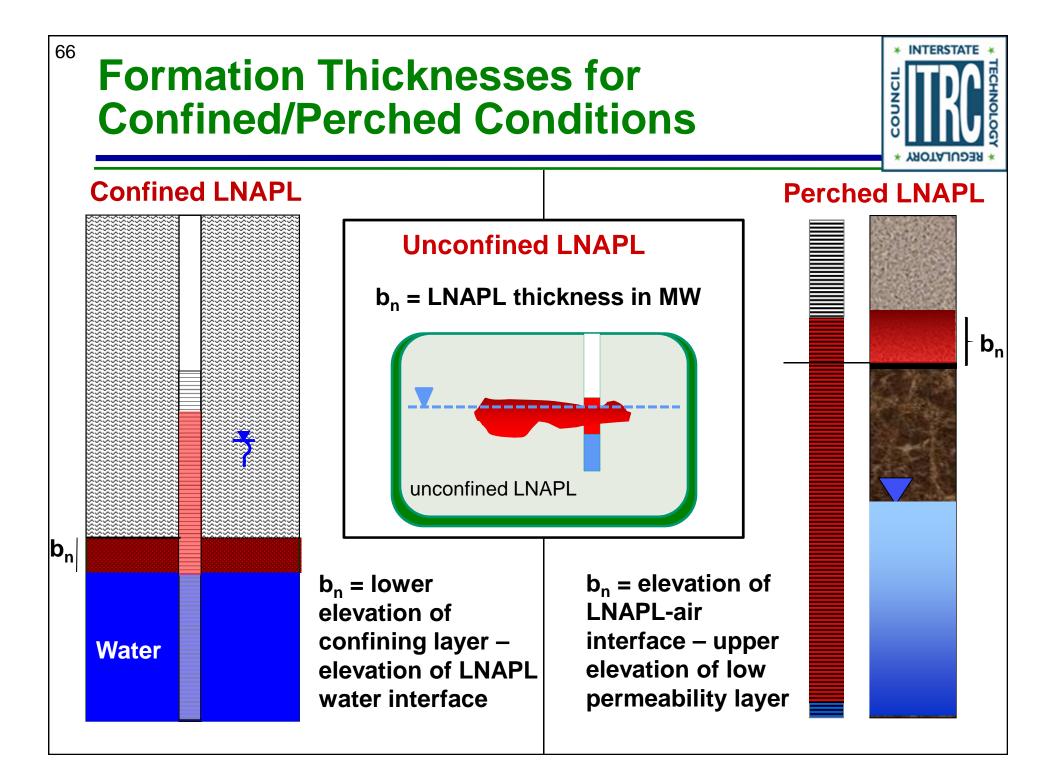
$$K_n = K_n b_n$$
 $K_n = \frac{\rho_n \cdot g \cdot k}{\mu_n} k_{rn}$

T_n is an averaged indicator of recoverability

• K_n varies with saturation



MW



T_n Values for Gasoline/Diesel



USDA Soil Type	Saturated Hydraulic Conductivity (ft./day)	LNAPL Thickness (ft.)	T _n gasoline (ft²/day)	T _n diesel (ft²/day)	LNAPL-2 = 0.1 - 0.8 ft²/day T _n modeled assuming homogenous soils
Medium Sand	100	1	8.5	0.2	1
		2	58	2.4	Relative Permeability
		5*	335	38	
Fine Sand	21	1	1.6	0.03	
		2	11	0.4	
		5*	67	7.4	
Sandy Loam	1.25	1	0.3	0.03	Kela
		2	1.0	0.1	0- 100% LNAPL Satn ^{0%}
		5	4.4	0.6	
Silt Loam	0.6	1	0.006	0.0	*5 ft formation thickness unlikely at old sites
		2	0.05	0.005	
		5	0.5	0.05	

Residual Saturation and Transmissivity

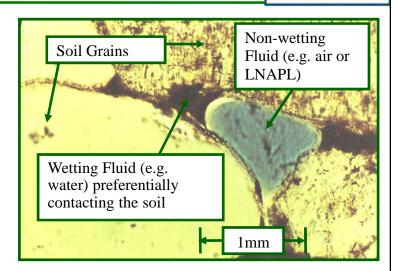
"the oil that remains in an oil reservoir at depletion"

Pet. Eng. Handbook, 1987

- "oil that remains after a water flood has reached an economic limit" Morrow, 1987
 - "saturation at which the NAPL becomes discontinuous and is immobilized by capillary forces"

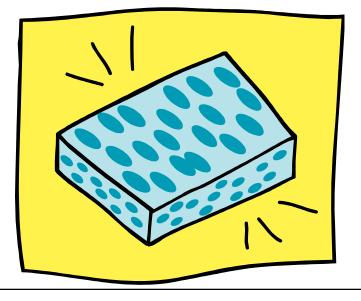
Schwille, 1984; Domenico and Schwartz, 1990; and Mercer and Cohen, 1990

When LNAPL saturation approaches Residual Saturation, LNAPL Transmissivity approaches Zero



From Wilson et al., (1990)

INTERSTAT







Knowledge Check



Background: A site has 7 ft. of LNAPL in a well. After a heavy rainfall season the LNAPL thickness increased to 9 ft.

Question: How would one make decision regarding recoverability?

- A. There is a lot of LNAPL at the site, and should be readily recoverable
- B. LNAPL is confined and does not need to be recovered
- C. Bail the LNAPL out and see how fast it recovers

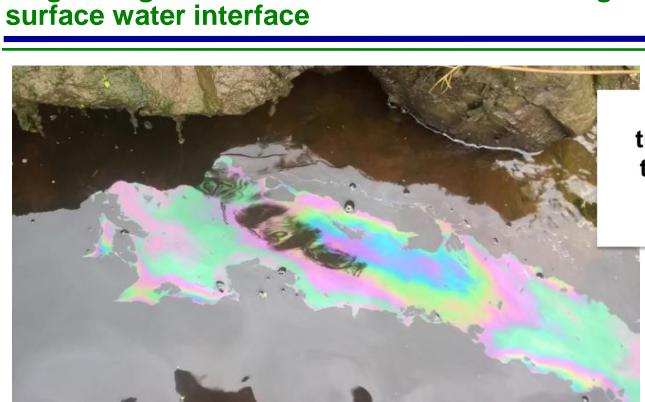
Key Message 8

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Causes for Sheens Not Necessarily LNAPL Migration





Originating from LNAPL in sediments at the groundwater

Petroleum Sheens

Key Message: transport of LNAPL to surface water is not necessarily gradient-driven

- 1. Seep: Groundwater discharge carries LNAPL sheen
- 2. Ebullition: Gas generated from degradation carries LNAPL sheen
- 3. Erosion: Erosion of sediments with LNAPL into water column

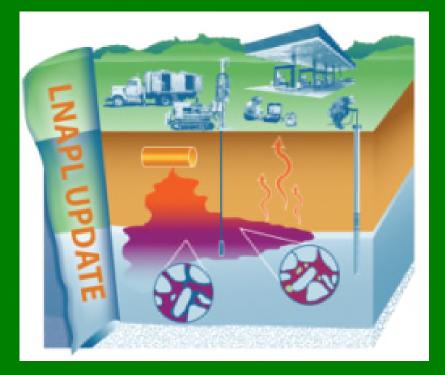
Image: CH2M (2016)

Key Message 9

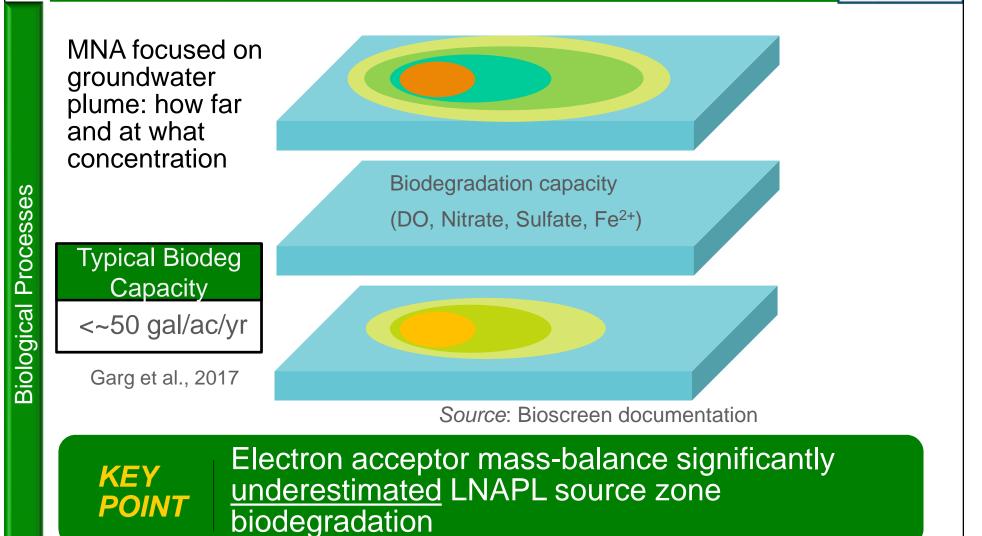
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Biological processes are important



Biodegradation Capacity of Saturated-Zone Electron Acceptors



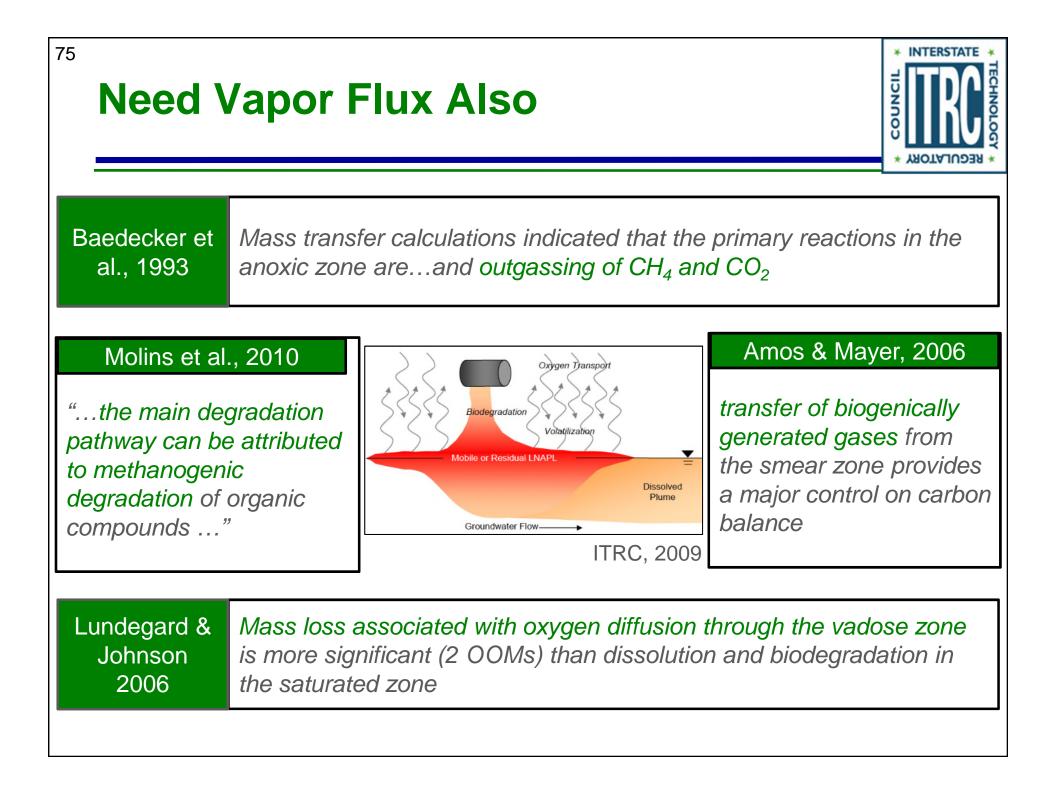
NSZD Rates Being Observed

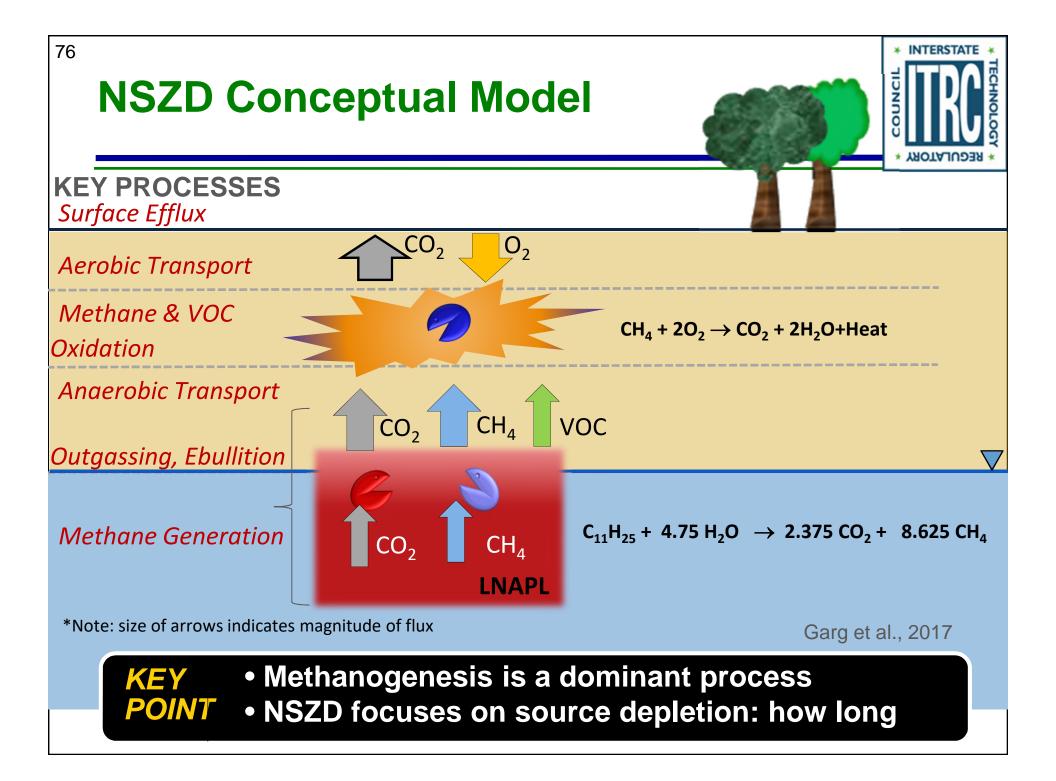


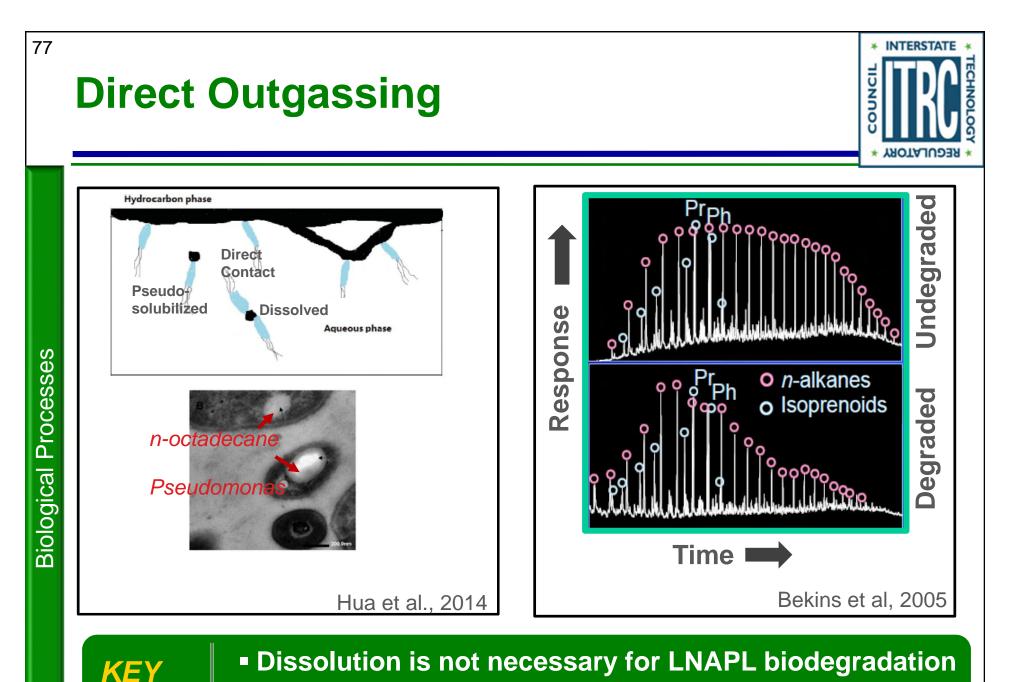
NSZD Study	Site-wide NSZD Rate (gallons/ acre /year)
Six refinery & terminal sites (McCoy et al., 2015)	2,100 – 7,700
1979 Crude Oil Spill (Bemidji) (Sihota et al., 2011)	1,600
Two Refinery/Terminal Sites (LA LNAPL Wkgrp, 2015)	1,100 – 1,700
Five Fuel/Diesel/Gasoline Sites (Piontek, 2014)	300 - 3,100
Eleven Sites, 550 measurements (Palaia, 2016)	300 – 5,600

KEY

NSZD rates are in the range of 100s to 1000s of gallons/acre/year POINT

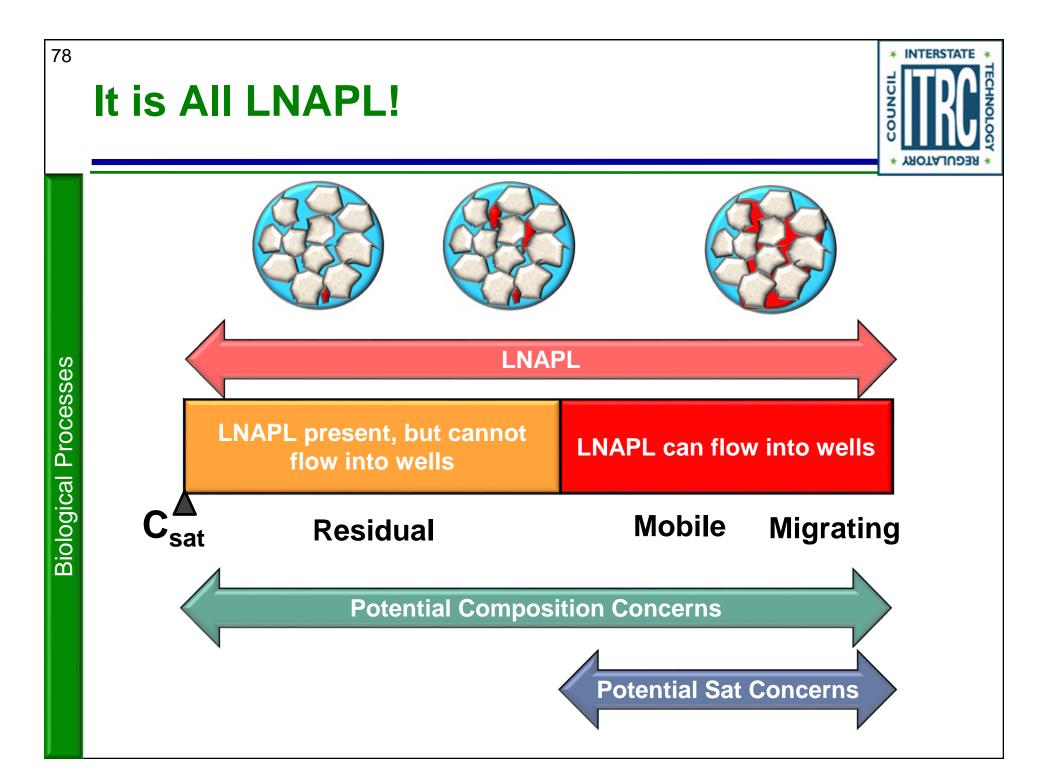






Biodegradation occurs in pore space near LNAPL

POINT



⁷⁹ Learning Objectives 3-Part Training Series



Part 1	Use LNAPL science to your advantage and apply at your sites
Part 2	 Develop LNAPL Conceptual Site Model (LCSM) for LNAPL concern identification Inform stakeholders about the decision-making process
Part 3	 Select remedial technologies to achieve objectives Prepare for transition between LNAPL strategies or technologies as the site moves through investigation, cleanup, and beyond "SMART"-ly measure progress toward an identified technology-specific endpoint

⁸⁰ ITRC 3-Part Online Training Leads to YOUR Action



Part 1: Connect Science to LNAPL Site Management

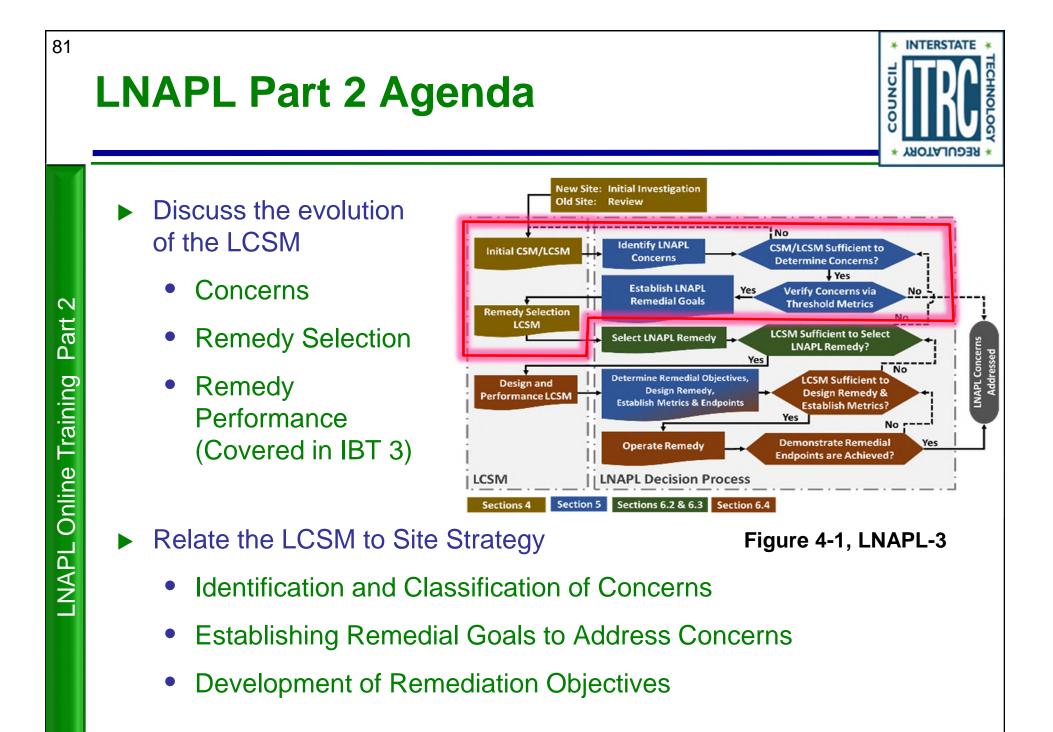
(Section 3)

Part 2: Build Your LNAPL Conceptual Site Model

(Sections 4 and <u>5)</u> Part 3: Select / Implement LNAPL Remedies (Section 6)

YOU Apply at LNAPL Sites and/or Modify Agency Guidance

Based on the ITRC LNAPL-3 Document: LNAPL Site Management: LCSM Evolution, Decision Process, and Remedial Technologies



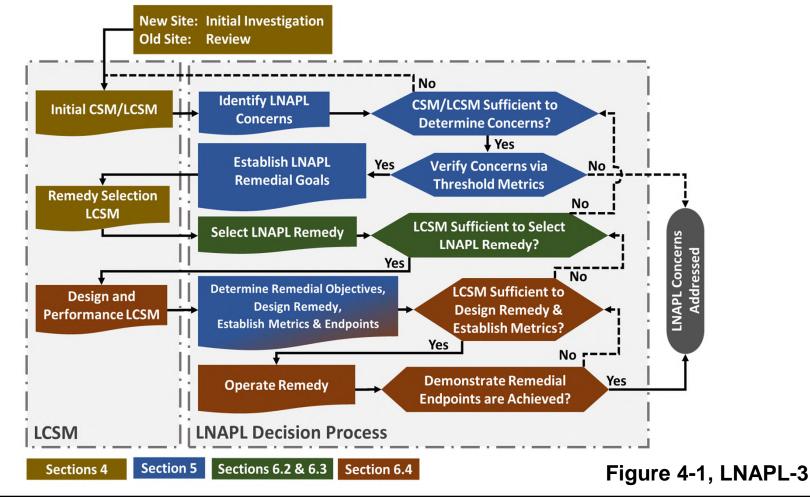


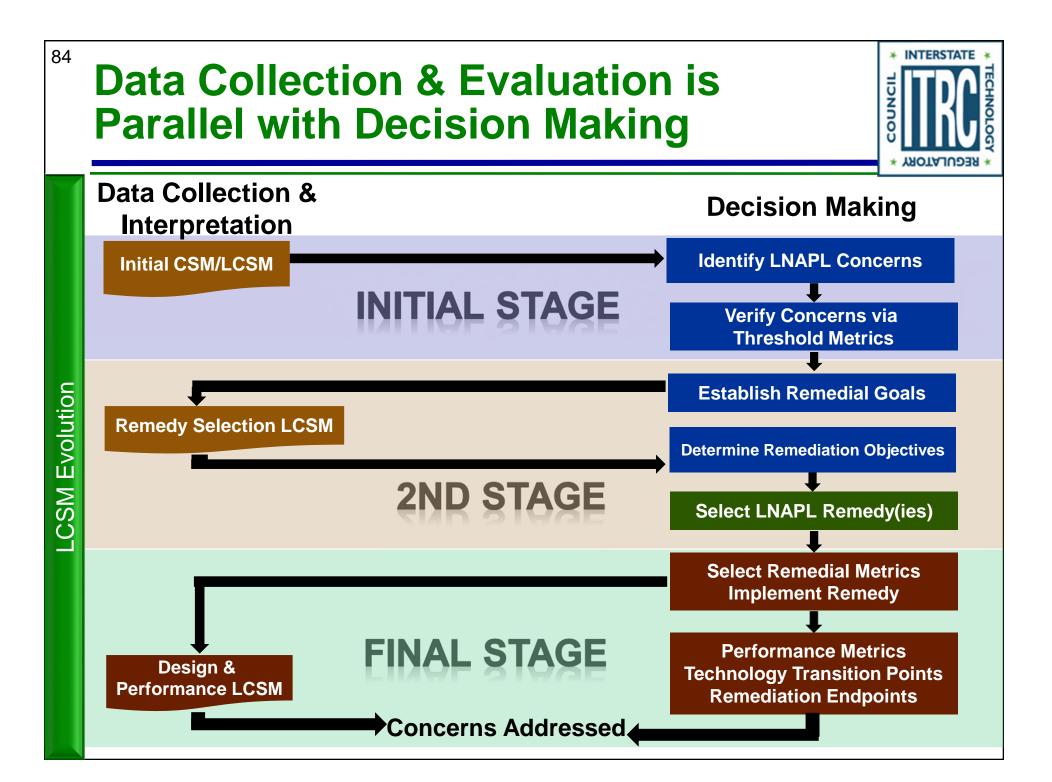


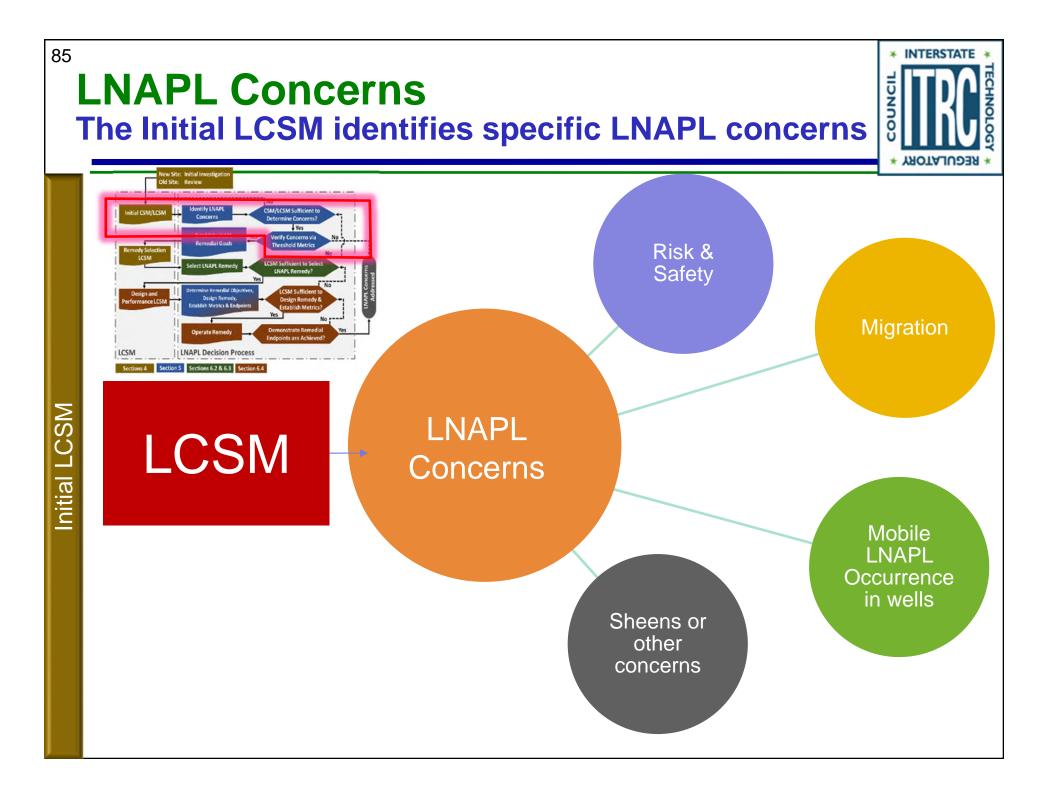
- The concept of continually updating the LCSM throughout the remedial process means:
 - A. The LCSM should become increasingly complex throughout the remedial process
 - B. Even if performance monitoring indicates progress toward endpoints, better check between borings to ensure uniform treatment
 - C. Reinvestigate with the latest tools as new characterization technologies evolve
 - D. The LCSM is updated to inform decisions throughout the project. Each decision point may require different data.

Welcome to Progression Beyond Infinity

- * INTERSTATE * TOONOUTINDEN * ANOTALUDER
- The LCSM is continually updated, but each update represents a focus specific to that project phase







Initial LCSM



- Overall, the Concerns portion of the LCSM are typically well developed and mature
- Recent improvements in this area include
 - PVI (PVI IBT)
 - Screening distances (ITRC, 2015)
 - Natural Source Zone Depletion
 - Plume stability & NSZD (IBT#1)
 - LNAPL transmissivity to improve understanding of recoverability as related to maximum extent practicable
 - Sheens Related Appendix in LNAPL Update document
- Ongoing Development
 - TPH guidance is being updated

- Recommended completeness test for Initial LCSM
 - LCSM should be able to inform a series of typical questions
 - Amount of detail for a given question is decided by asking "is there sufficient understanding to enable <u>Decision Making</u>?"

What is Needed for the Initial LCSM Consistently Needed or Possibly Needed?

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Initial LCSM

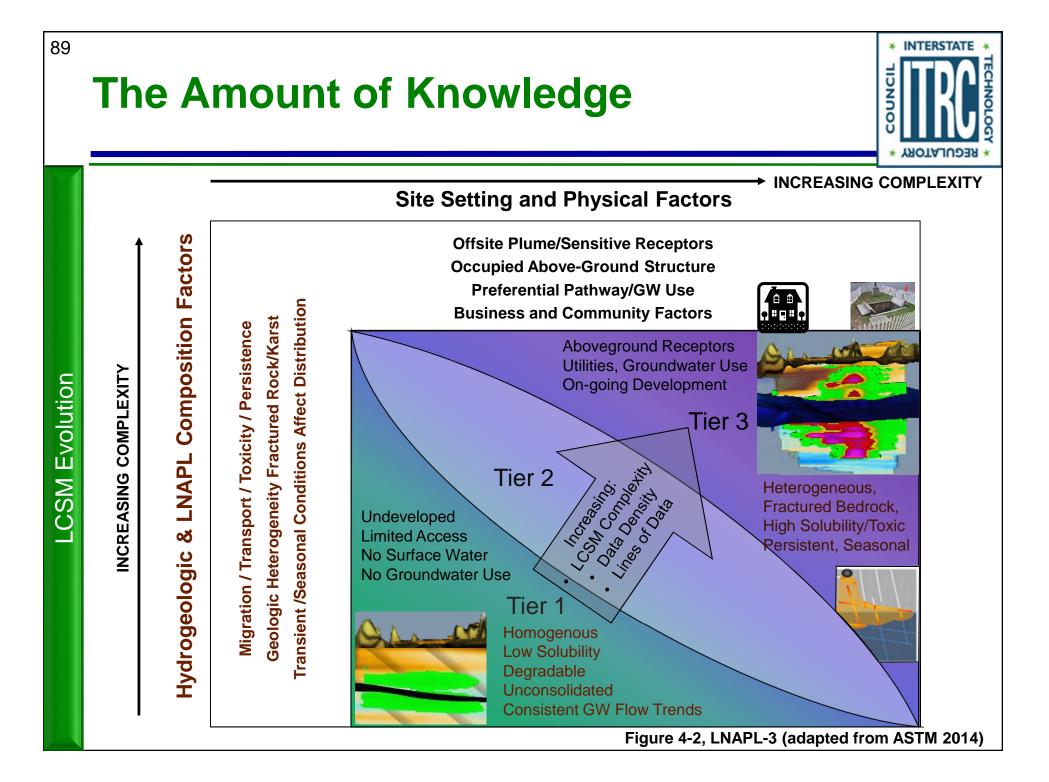


- Receptors NEED to understand where they are relative to plume
- Extent of impacts NEED to understand if receptors are affected
- Migration NEED to understand if existing impact extent will change
- LNAPL Occurrence in wells Regulatory driven NEED
- Hydraulic Conductivity Typically not needed to evaluate Concerns. Site Specific – for Concerns and Often Needed in Remediation
- Distribution of LNAPL and dissolved/vapor within the extent of Impacts – Typically not needed to evaluate concerns, Site Specific – for Concerns and Often Needed in Remediation

The Concerns LCSM Litmus Test



- The questions provided:
 - Are typical of multiple guidance (ASTM, CRCcare, IPECA, EPA)
 - Encourage a systematic framework to develop an LCSM
 - Encourage a systematic thought process to help confirm the completeness of the LCSM
 - Only apply to the Initial LCSM & may not be sufficient to select a remedy
 - 1. Is current and future land use known?
 - 2. Does the potential for preferential pathways exist?
 - 3. How does stratigraphy relate to affecting impacts and potential migration?
 - 4. Is the source and extent of the LNAPL known?
 - 5. Are dissolved or vapor issues expected based on LNAPL composition?
 - 6. Are dissolved or vapor plumes characterized?
 - 7. Do soil or groundwater concentrations exceed criteria?
 - 8. Are exposure pathways complete or incomplete?
 - 9. Is the LNAPL body stable?
 - 10. Is the mobile LNAPL hydrogeologic condition known?



Tier 1 vs. Tier 3

Tier 1 Retail – Diesel in Sand

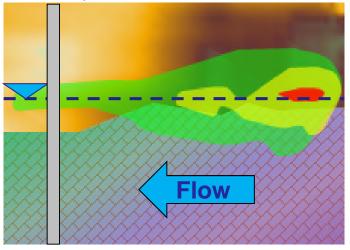
- 10 15 feet to Water-table
- Dissolved plume contained onsite (MNA)
- Mobile LNAPL in wells $T_n 1.0 \text{ ft}^2/\text{day}$
- LNAPL is not under any buildings
- Release occurred 10+ years ago
- Well Defined Remedial Concerns
- No risk, Tn above but close to 0.8 ft²/day

Tier 3 Retail – Gasoline Interbedded Soil Over Bedrock

- Water- Table 15-20 ft. depth
- Fractured bedrock at ~25 ft depth,
- Down gradient receptors 30 year old bedrock screened wells exhibit impacts
- LNAPL is off-site in unconsolidated soil
- What are remaining questions for the LCSM?
 - Likely requires nest well pairs (unconsolidated bedrock) for dissolved delineation



Receptor Well

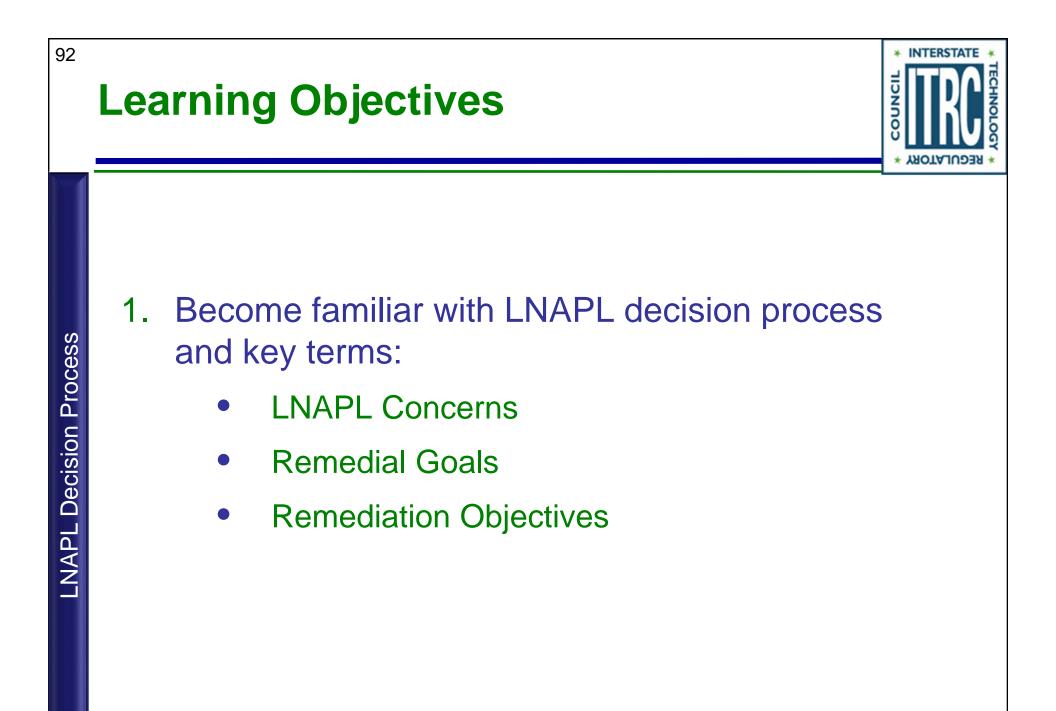


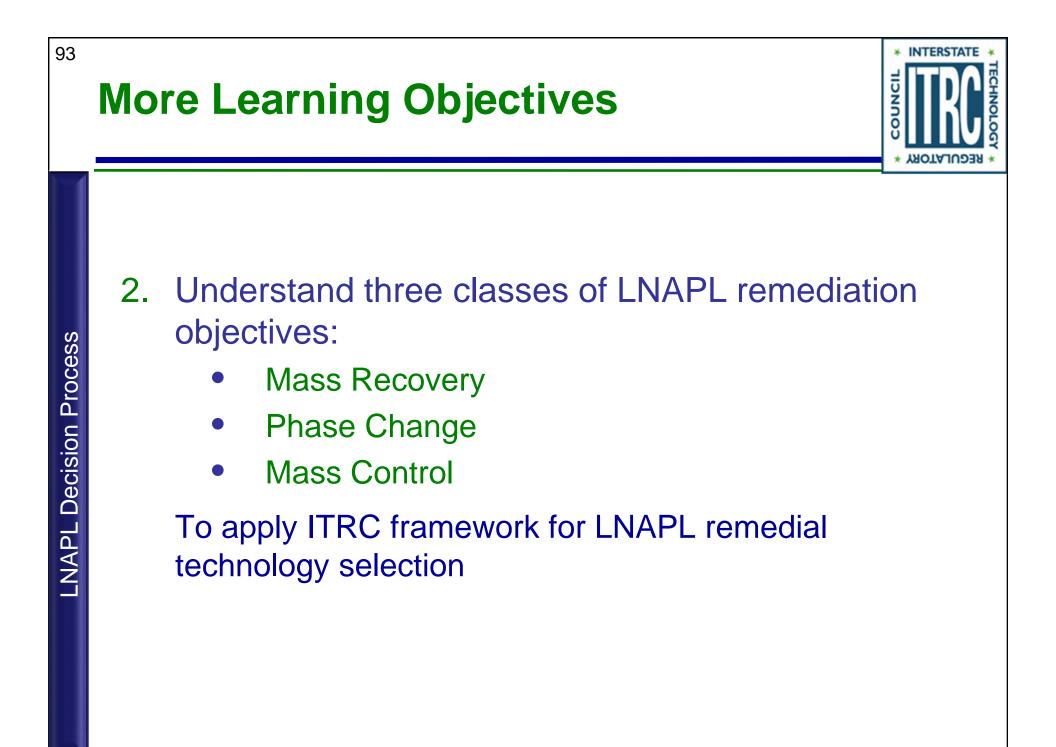


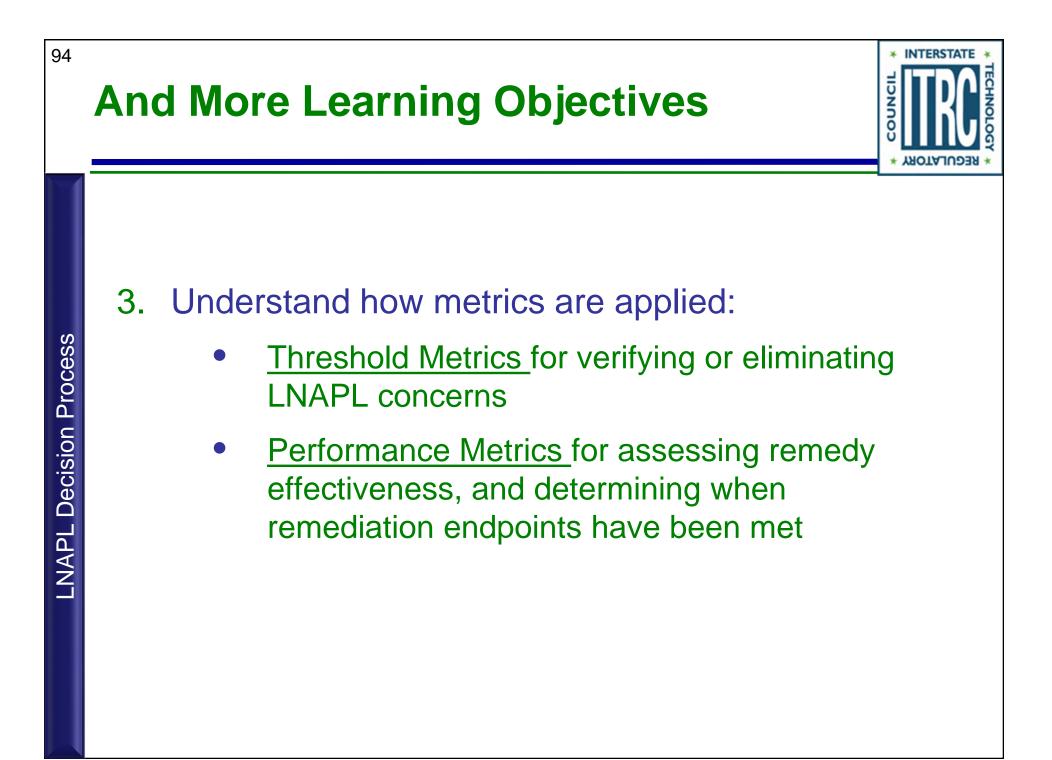
Summary Initial LCSM and The Decision

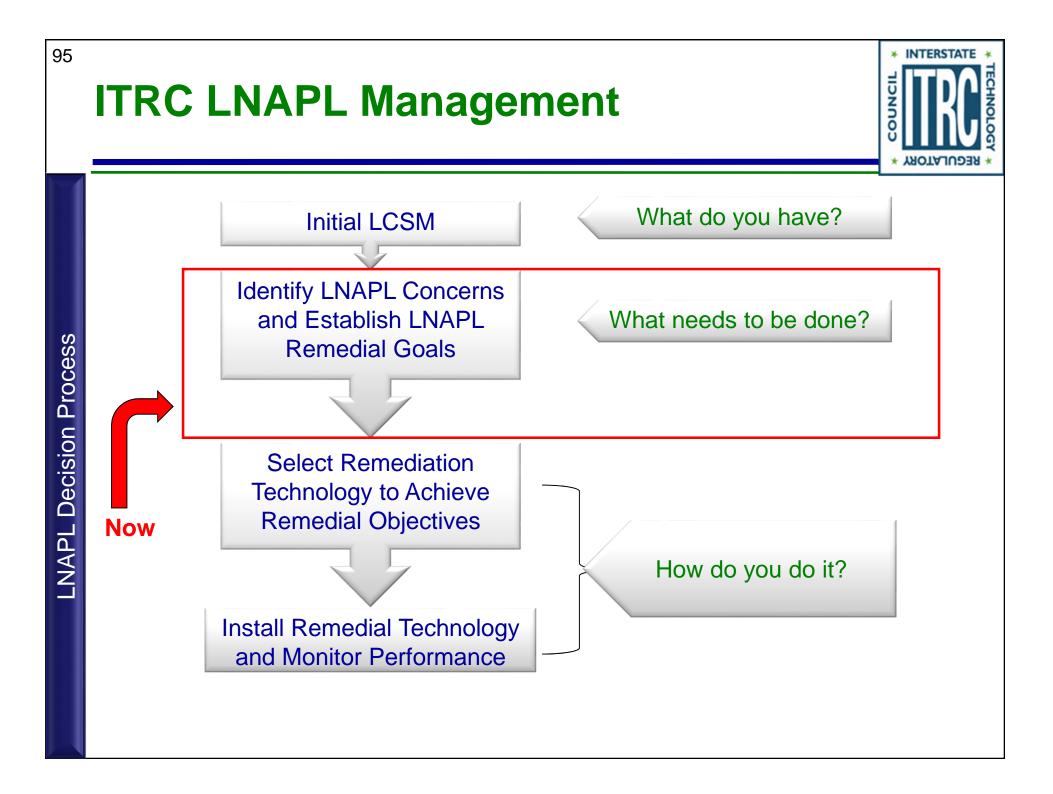


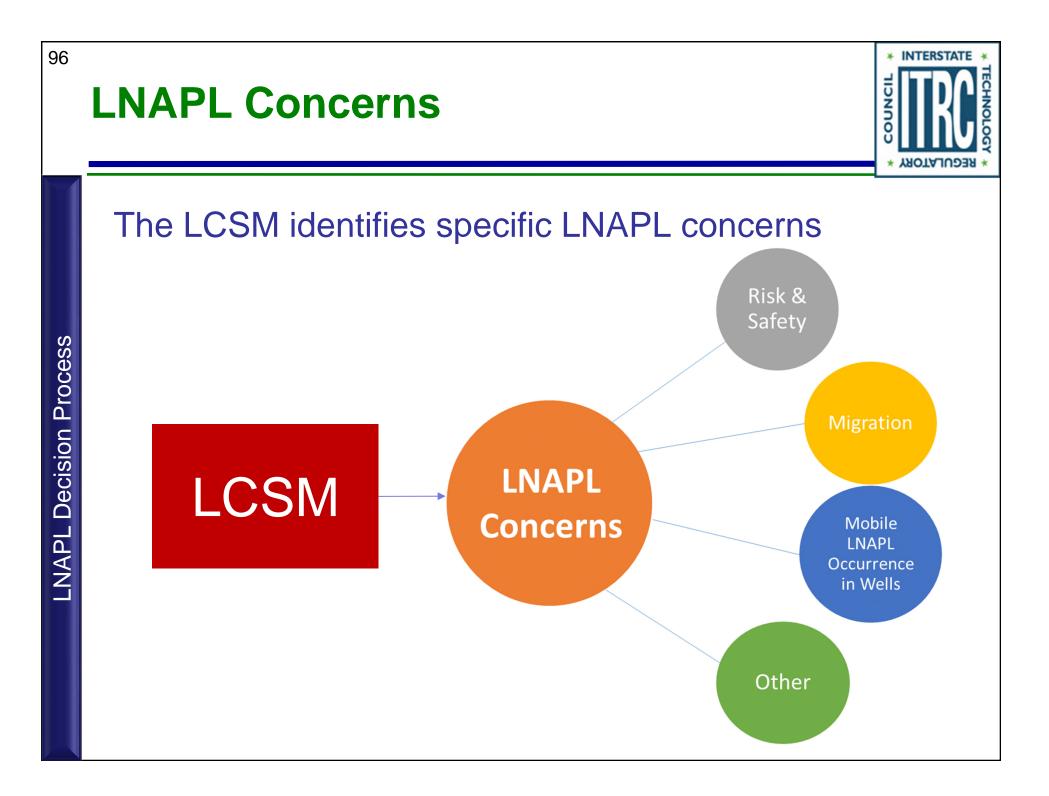
- Is there sufficient information for a given question to support identification of Concerns?
- Is additional site characterization required for evaluating the Concerns LCSM?
 - Initial characterization activities may go beyond collecting data for concerns
 - Combining mobilizations for concerns and remedial selection characterization may improve efficiency at sites where remediation is already known to be needed
 - Collecting remedial-technology-focused characterization data at more complex sites may result in incomplete data collection, or less efficient data collection

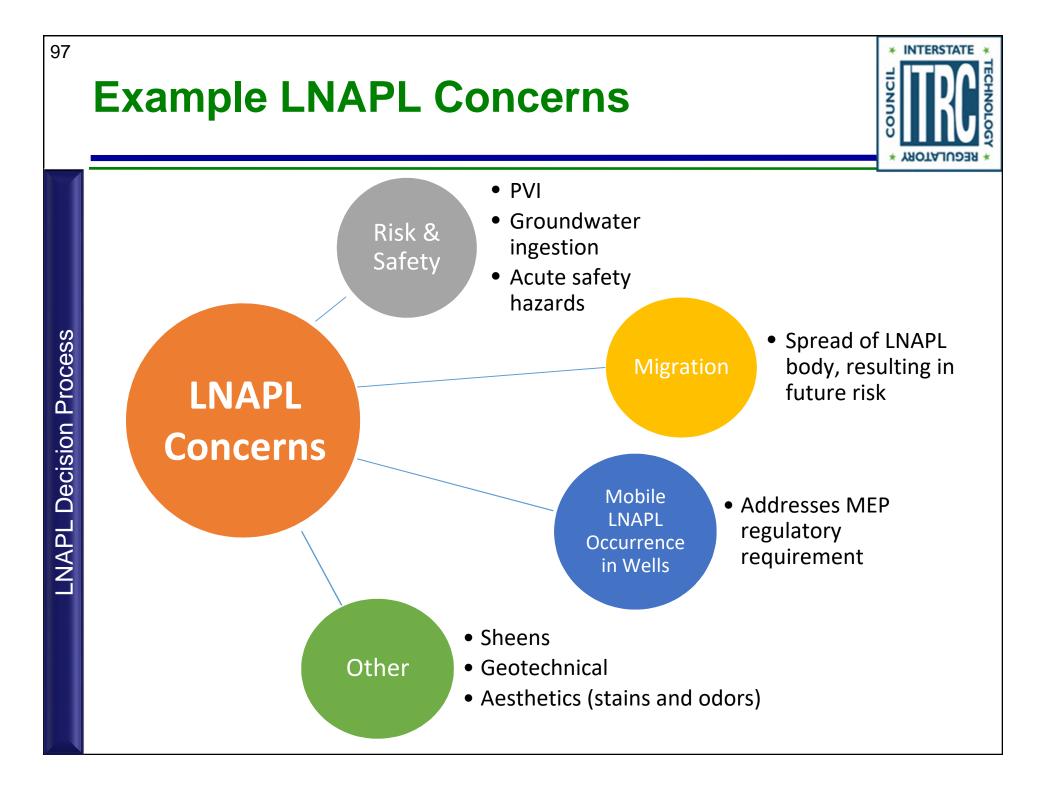


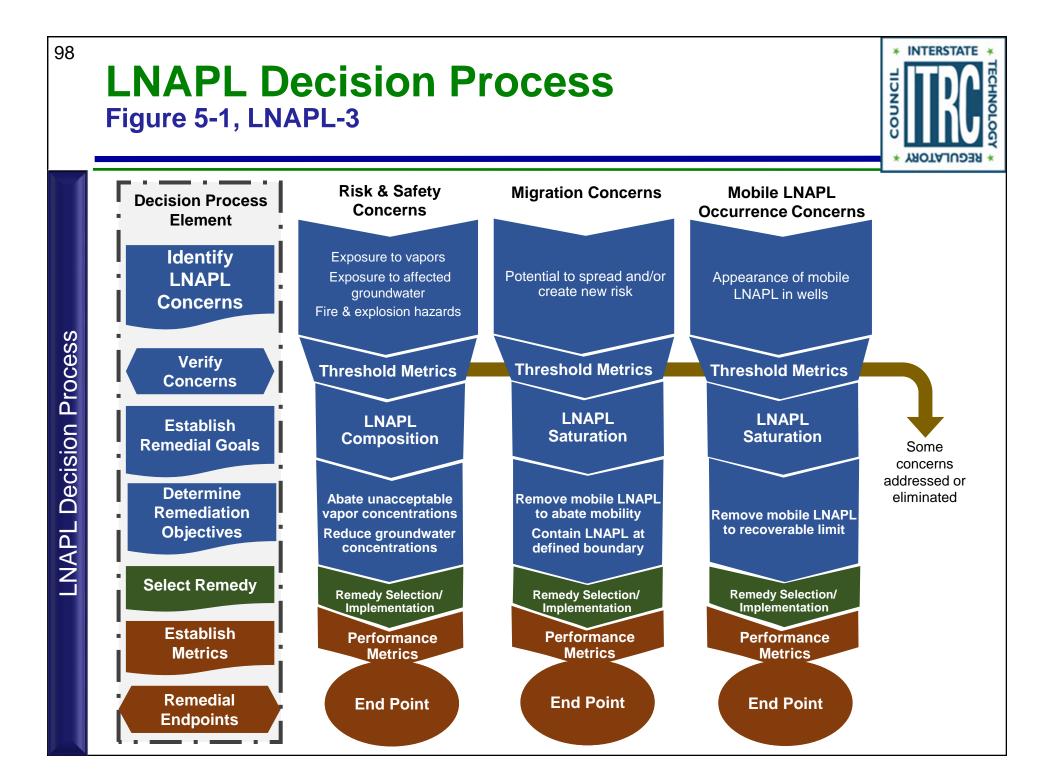


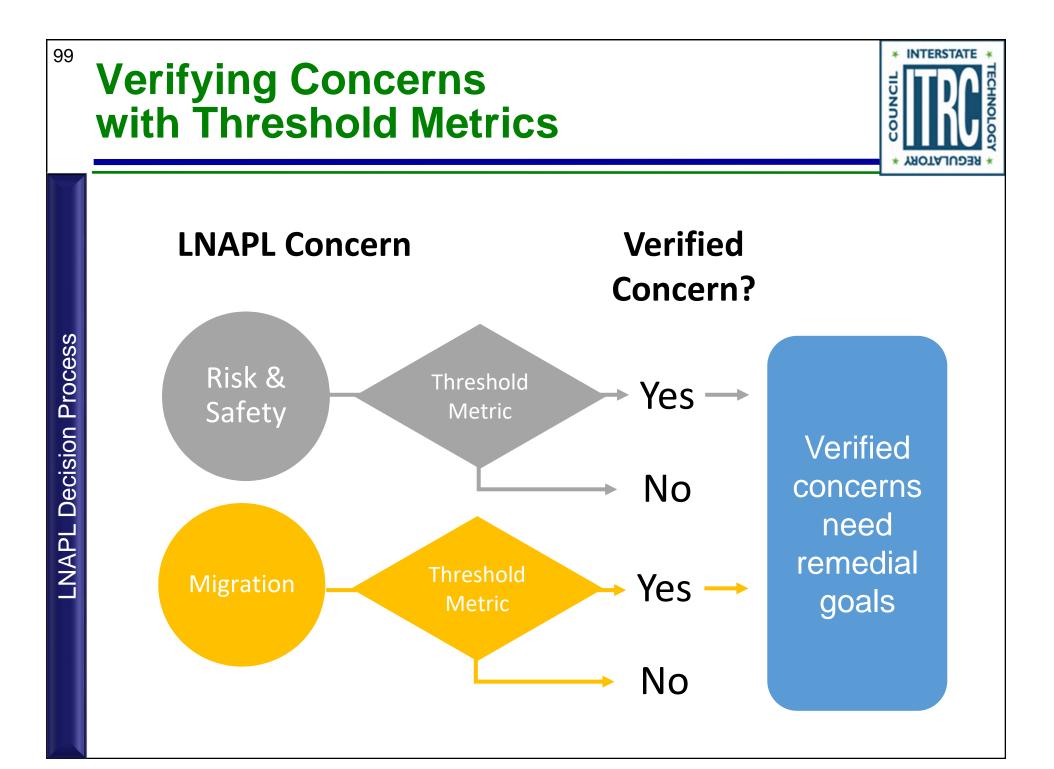


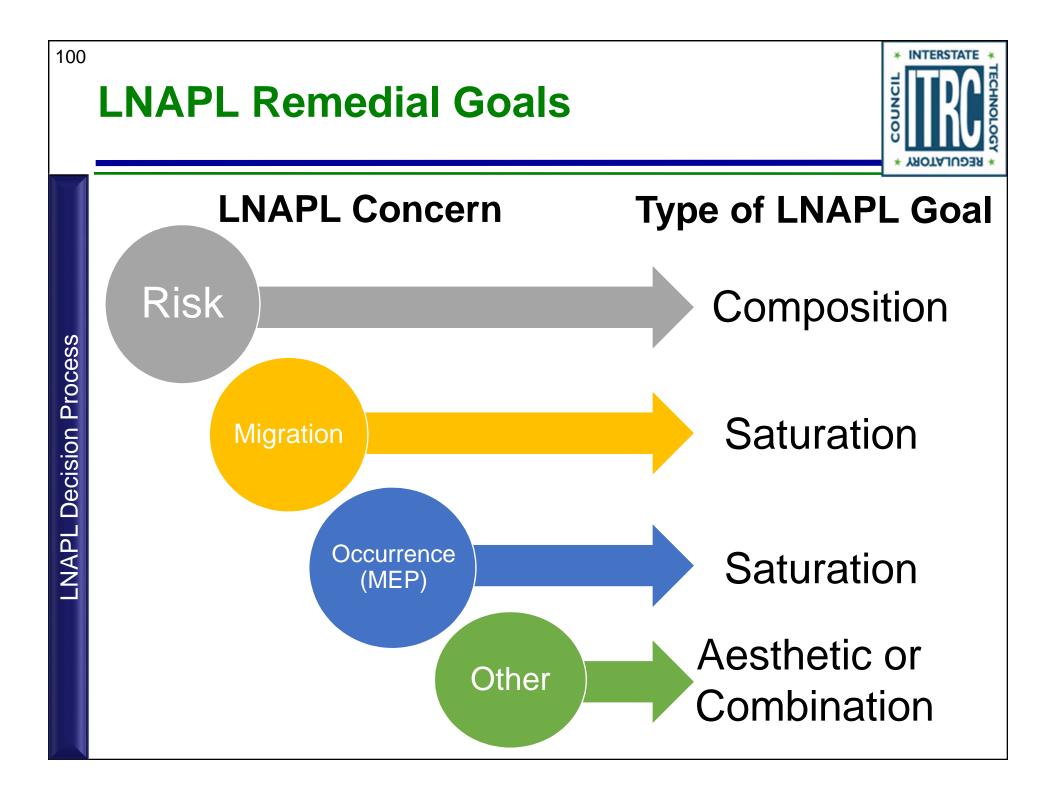












Remedial Goal vs. Remediation Objectives

LNAPL Remedial Goal:

the desired change in LNAPL conditions

Aspirational... envisioning a future state

Established <u>before</u> choosing remedy

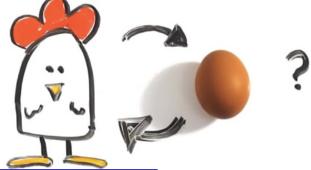


LNAPL Remediation Objectives:

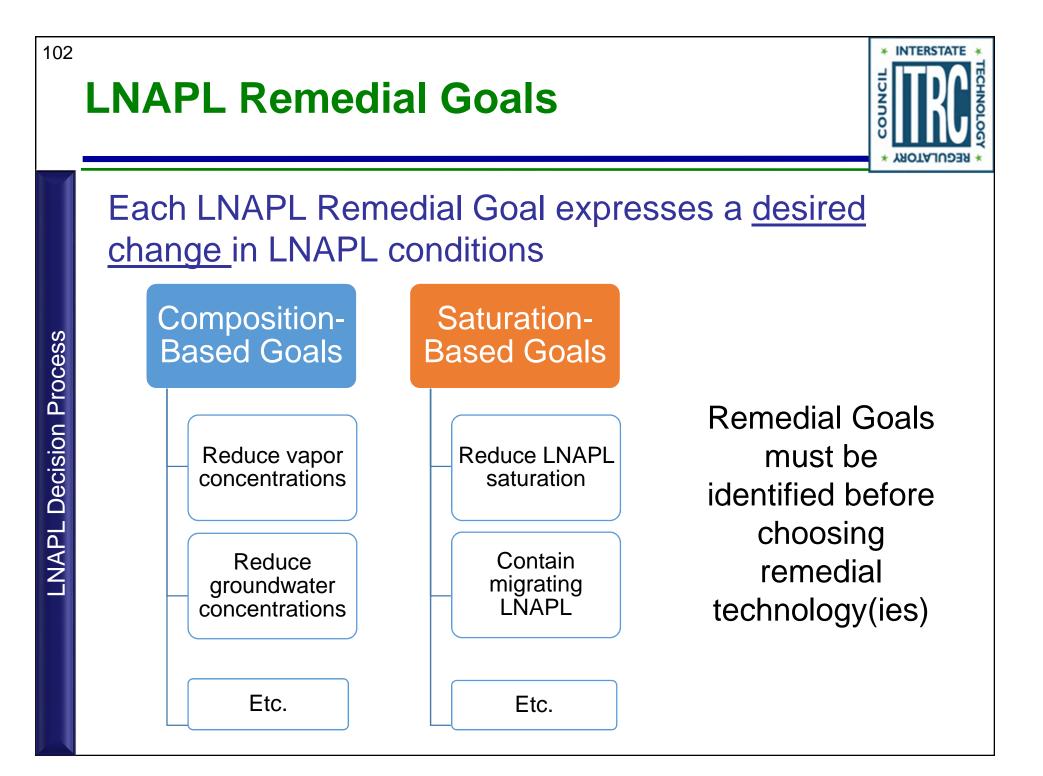
the <u>actions</u> and desired <u>outcomes</u> that need to occur using the chosen technology

Tactical... how to get to the goal

Determined <u>in parallel</u> with remedy selection



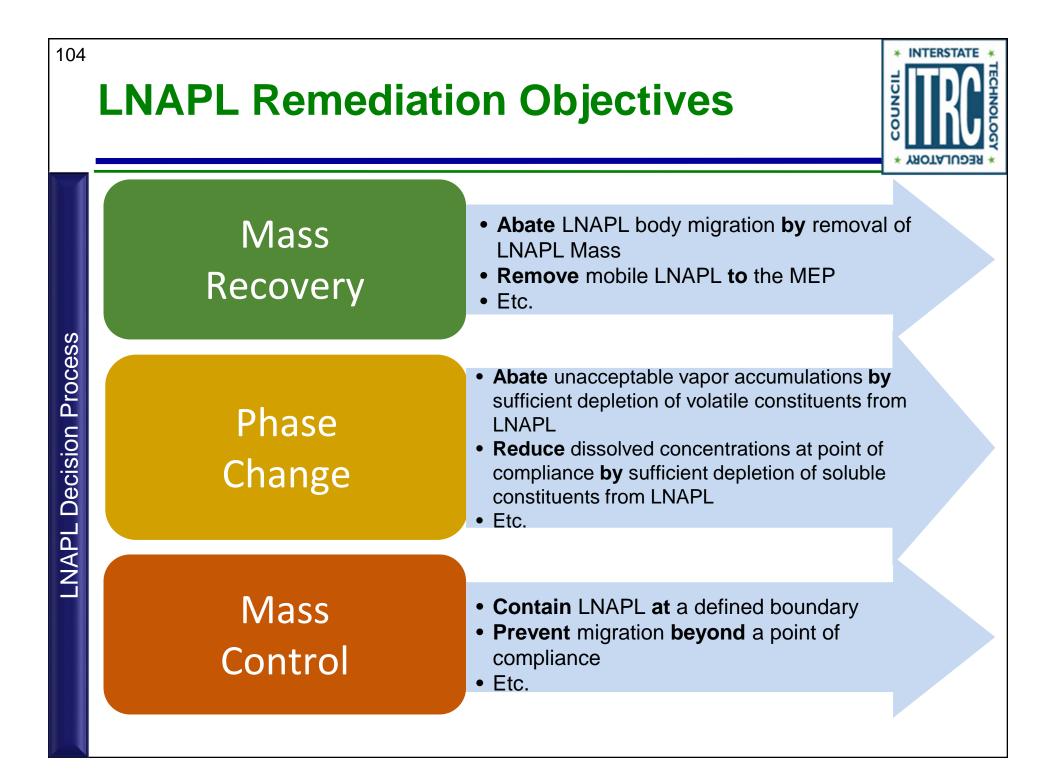
These definitions are the *opposite* of what they were in the previous ITRC LNAPL Guide

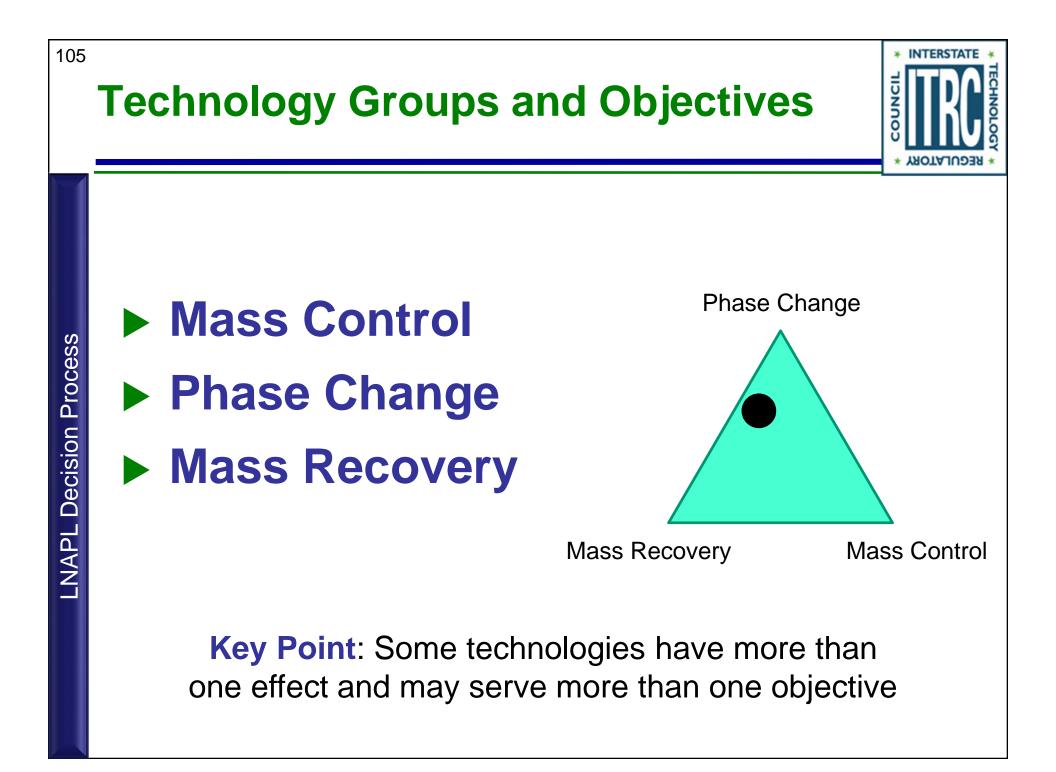


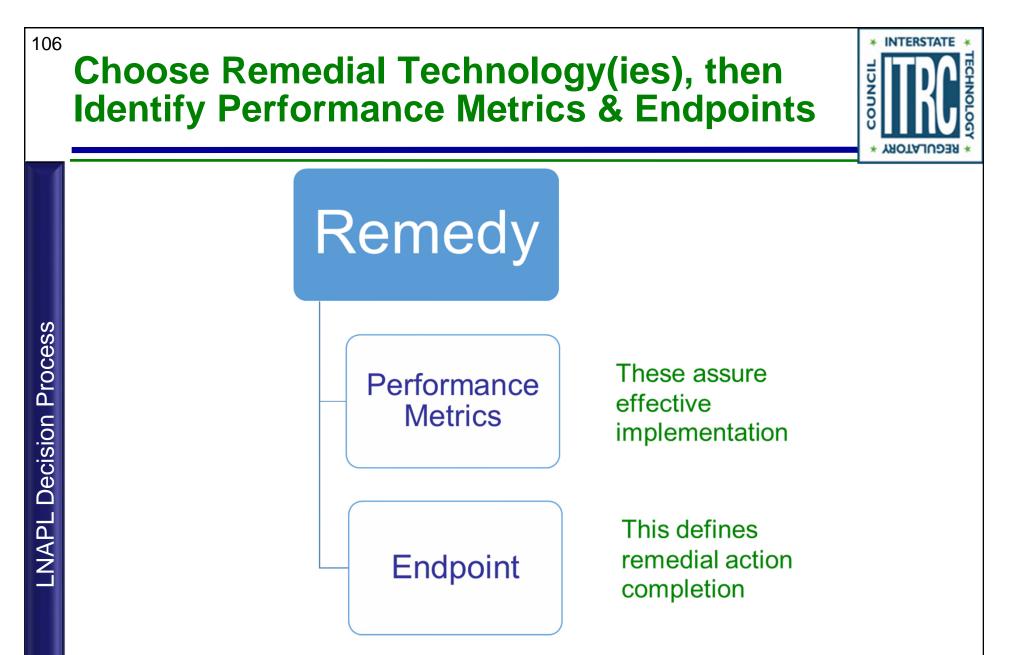




- LNAPL remediation objectives describe how the goal will be accomplished by the selected technology(ies)
- Remediation objectives state the <u>actions</u> and desired outcomes that need to occur using the chosen
- Combined with the agreed-upon endpoint and performance metrics, the remediation objectives becomes SMART







Performance Metrics and Endpoints are SMART and technology-specific

107 Why Are We Focused on the Remedy LCSM Development of CSMs for identifying risks, concerns, etc. is fairly mature CSMs are also sufficient to identify completion of remediation (i.e., there are no more concerns, risk, etc.) Remedy Selection LCSM Refinement of CSMs for technology Selection, Optimization & Confirmation represent the highest potential for improvement Historically, remedies have been selected based on an incomplete understanding of LNAPL occurrence, nature and remedy performance Remediation has often been driven by LNAPL thickness in wells without considering the relationship between LNAPL thickness and recoverability or the effects of LNAPL recovery on subsurface conditions The Remedy Selection LCSM aims to inspire continuation of improvements to CSMs for LNAPL remedy selection

Remedy Selection Needs Improvement This Starts with the LCSM

* INTERSTATE *

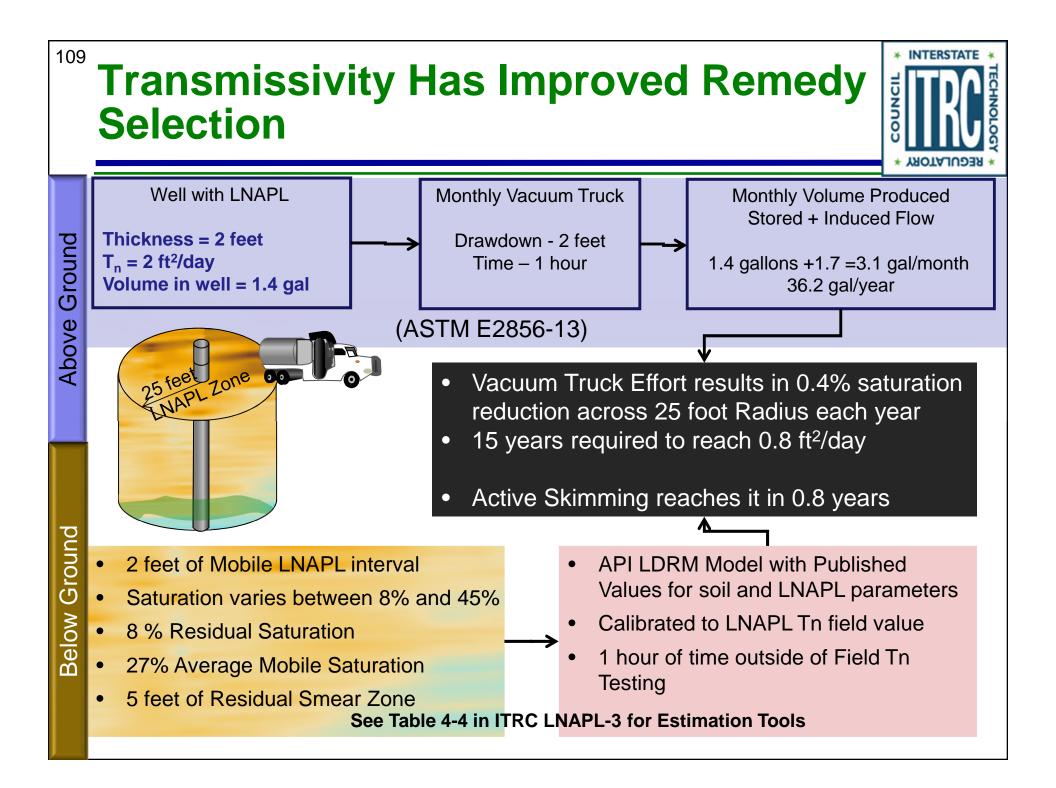
- Our concerns are known,
- We know the Remedial Technology Types
- Ok, move ahead with remediation?!? Give it a shot?



- LNAPL in Well
- No Migration



Insufficient data often exists at end of concerns LCSM to choose a remedy that will achieve remedial goals



¹¹⁰ Remedy Selection Should be Informed by the LCSM not just the Concern



- The concern associated with a gauged LNAPL thickness or a dissolved phase concentration does not indicate how to eliminate it
- This Section will identify approaches to answer
 - Where remediation needs to target
 - Which remedial mechanisms may be effective
 - Improved quantification of these mechanisms prior to implementing a technology

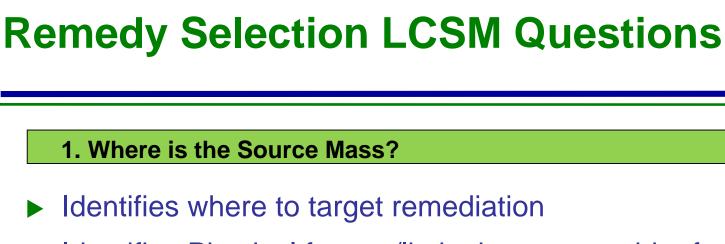
Improved Remedy Selection is Achieved through Understanding

- A. Homogenous Permeable Soil
- B. Interbedded within coarser zones that are surrounded by finer grained layers

INTERSTA

- C. Within low permeability media, secondary porosity, fractures, karst
- D. Is the LNAPL source distributed above or below the water-table
- 2. What Is Nature of the Source?
 - A. Volatile and/or Soluble
 - **B. Biodegradable**
 - **C. Mobile vs Residual Fractions**
- 3. What is Achievable for a Given Technology?
 - A. Mobility-Based Limit
 - **B. Volatility-Based Limit**
 - C. Solubility-Based Limit
 - D. Biodegradability-Based Limit
 - E. Other Safety, Depth, Sustainability (e.g., community impact, energy/resource use).
 - E. Design Data Radius of Treatment, Waste Production/Treatment

Remedy Selection LCSM



- Identifies Physical factors/limitations to consider for impacted soil
 - Soil Permeability
 - Depth absolute and relative to water table
- References (See Tables 4.2 in the ITRC LNAPL-3 Document for additional Tools)

Brief Discussion of Tools is Next