



NEIWPCC

TANKS PROGRAM

- **Webinar Series**
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- **National Tanks Conference**





***LUST CORRECTIVE
ACTION WEBINAR
SERIES:***

***AIR SPARGE, SOIL VAPOR
EXTRACTION, AND DUAL-
PHASE EXTRACTION AT LUST
SITES***

11/16/2021

TODAY'S SPEAKERS



Edward Tung | *M.K. Environmental, Inc.*

Matthew Lahvis | *Shell Global Solutions (US) Inc.*



Environmental Inc.

Air Sparge, Soil Vapor Extraction, and
Dual-phase Extraction at LUST Sites

Edward Tung, P.E.

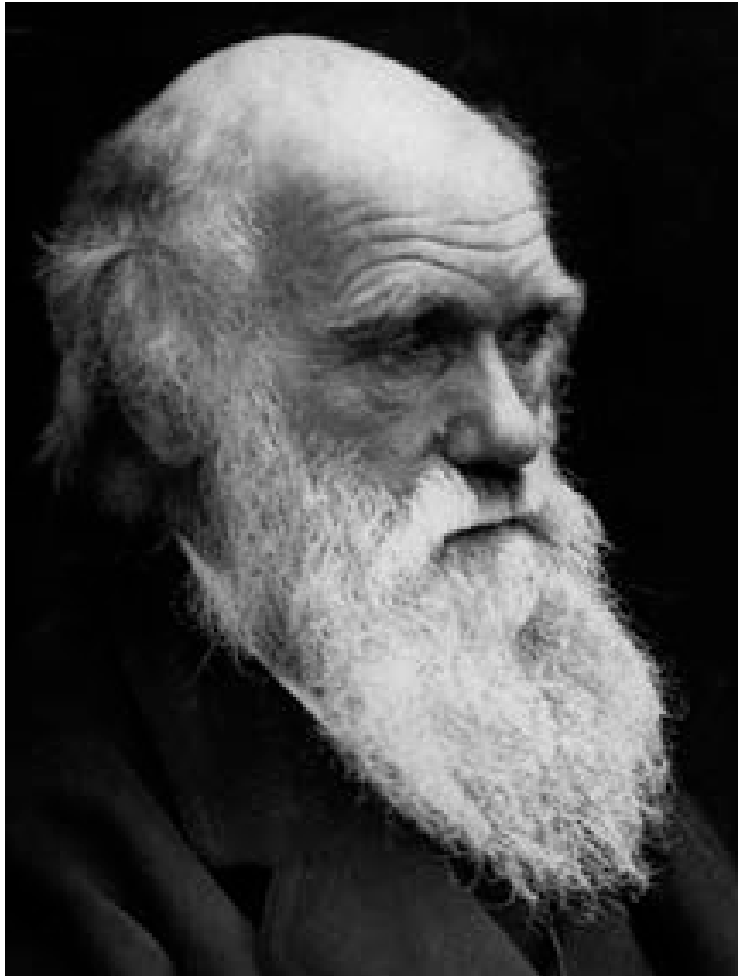
The logo graphic consists of a vertical black line on the left side. To its right, there are three overlapping squares: a yellow one at the top, a red one in the middle, and a blue one at the bottom. The squares have a gradient effect, fading out to the right.

MK Company Overview

- Over 1000 packaged UST systems installed
- Sell, Rent and Operate Remediation systems
- Over 1.25 Million hours of direct operational experience @ > 96% uptime, PFP.
- 50 Thermal Remediation Systems (DPVE plus steam and electricity, 200°F)
- Directly invested in success



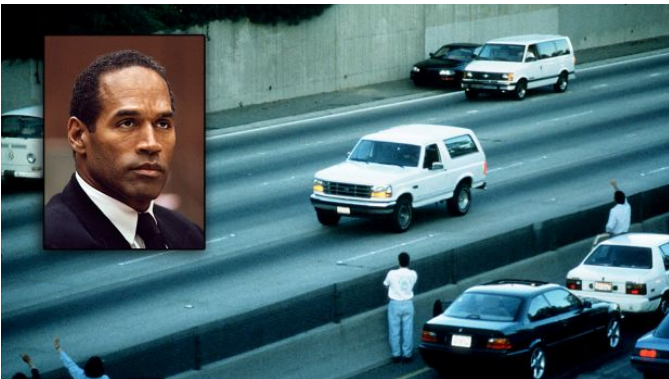
EVOLUTION OF EQUIPMENT SELECTION



- Market Forces
- UpTime demands
- Efficiency
- Reuse/refurbish
- Simultaneous Multiple Technologies
- Software/ algorithms

1994

First Packaged Remediation System



Outdoor Systems



Wooden Shed

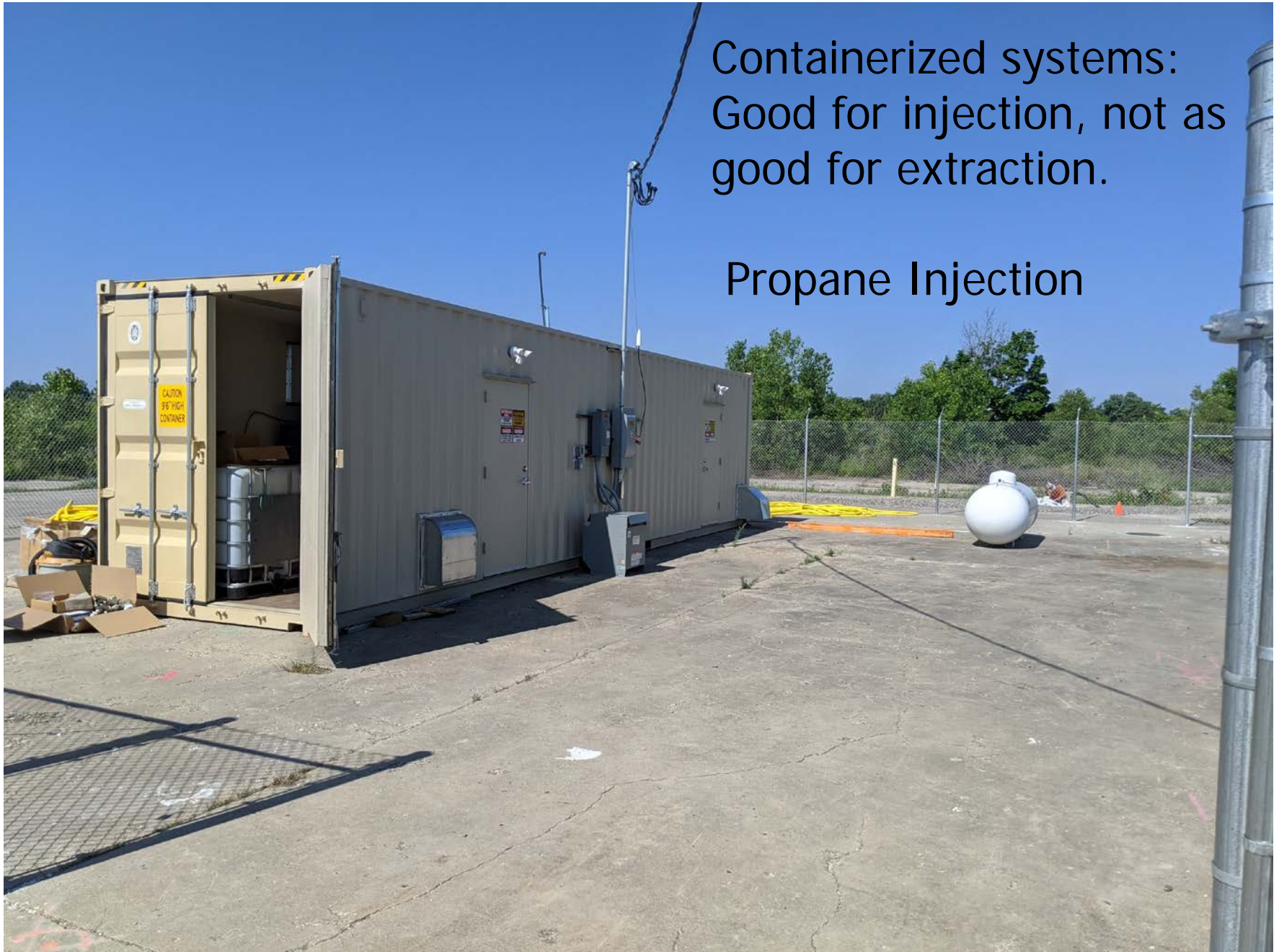


Trailerized System



Containerized systems:
Good for injection, not as
good for extraction.

Propane Injection



DVPE Pre-fabricated Package

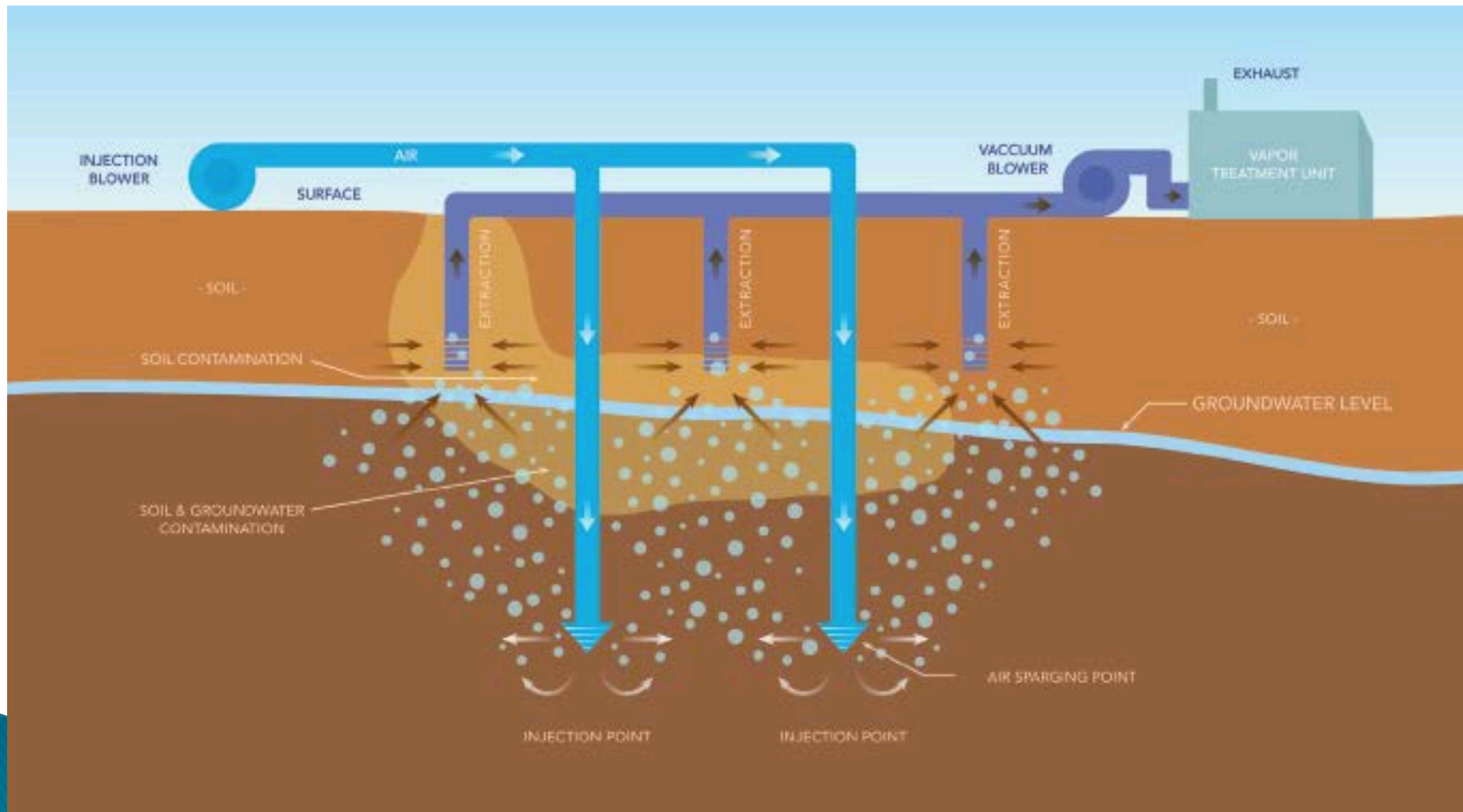


- Small footprint
- Maintenance friendly
- Reuse for multiple site clean-ups

Equipment Procurement :

- New equipment purchase
- Used equipment
- Factory Refurbished equipment
- Rental equipment/pay for service
- General trend is Refurbished, some New, some Rental, very few used.

SVE/AIR SPARGING



Air Sparge Generalities

- 3-5 CFM per point
- Pressure = water overburden + soil overburden
- Tighter well spacing vs SVE
- ROI ~ depth under contamination
- Size SVE for at least twice the sparge air flow rate

Air Sparge Selection

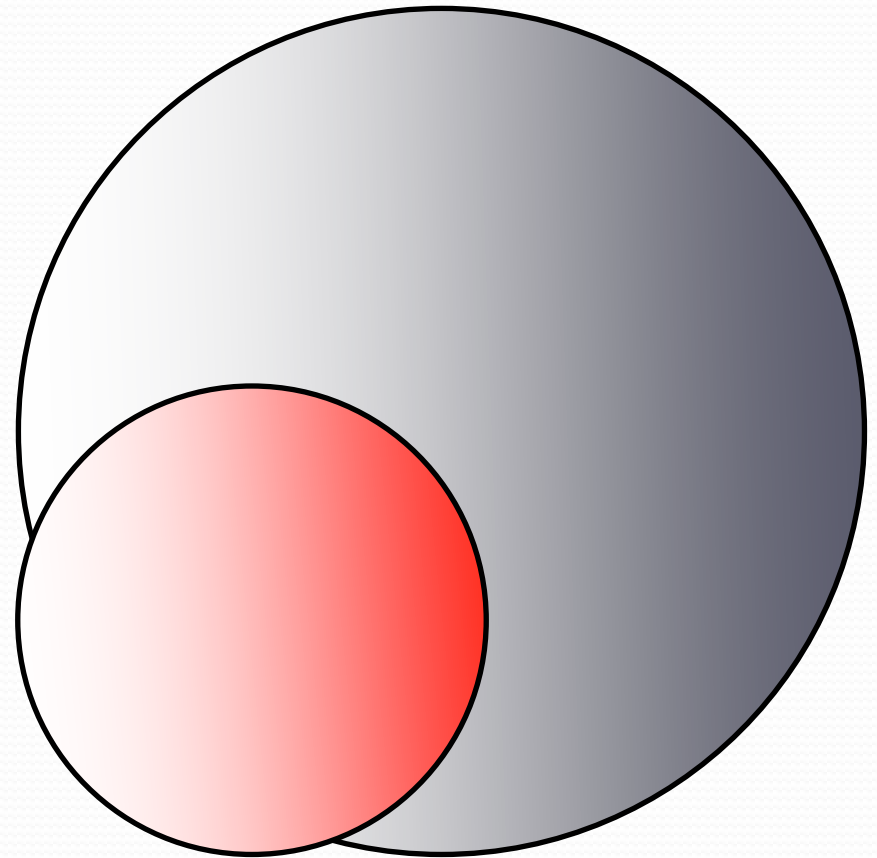
- Rotary Vane: 20 PSI, small, efficient, low cost
- Rotary Lobe: 15 PSI, loud, efficient, low cost
- Rotary Claw: 32 PSI, loud, hot, high cost
- Rotary Screw Compressor: 120 PSI, inefficient, high cost, oil contamination
- Ozone: oxidation technology, generally < 60 PSI, low flow, high cost

Rotary Vane

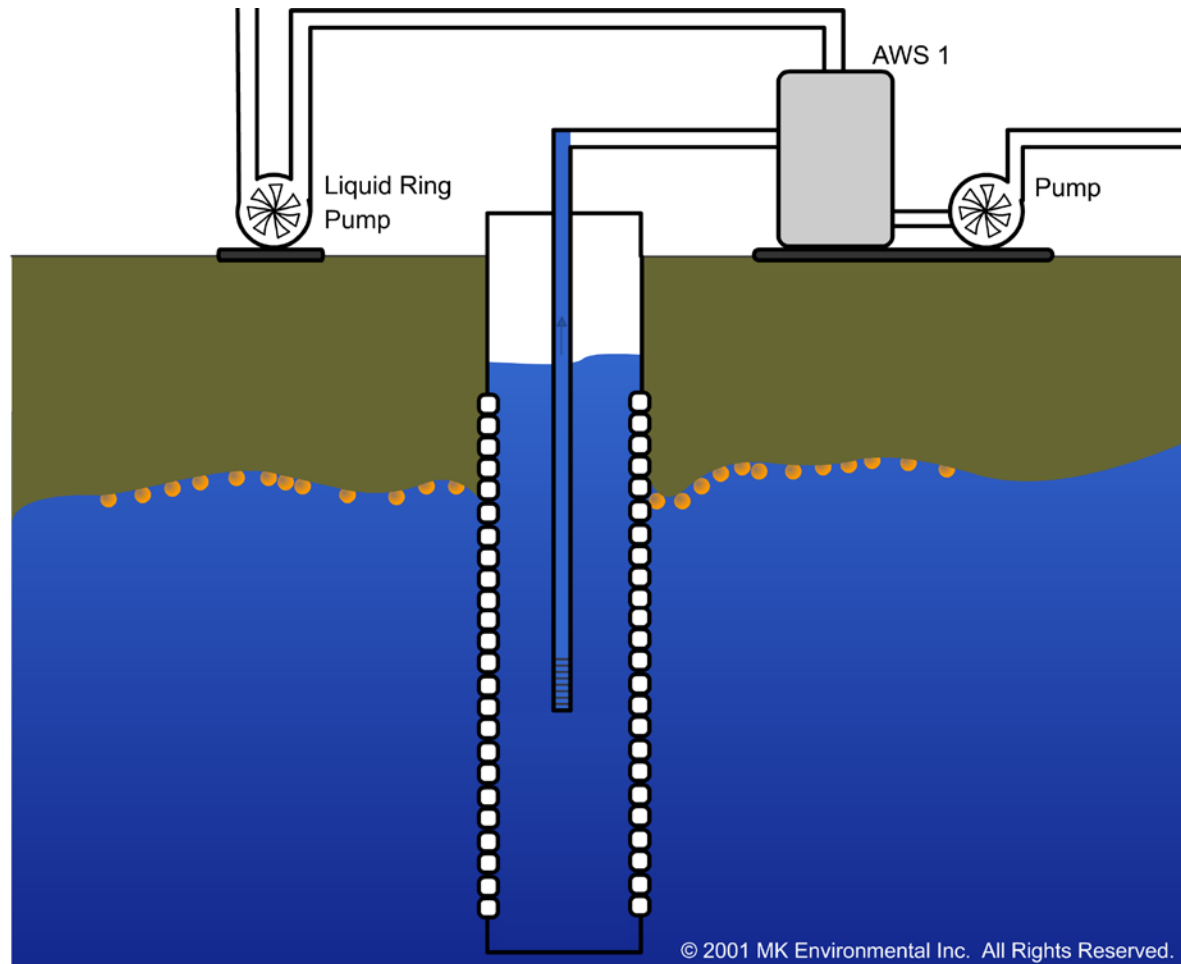


SVE & DPVE: Focus on the Vapor

- Relative pore volumes of Vapor vs Liquid Extracted
- Vapor is Much Easier to Extract Than Liquid From Porous Media
- 90% of the Mass is Recovered in the vapor



Dual Phase - Principle of Operation



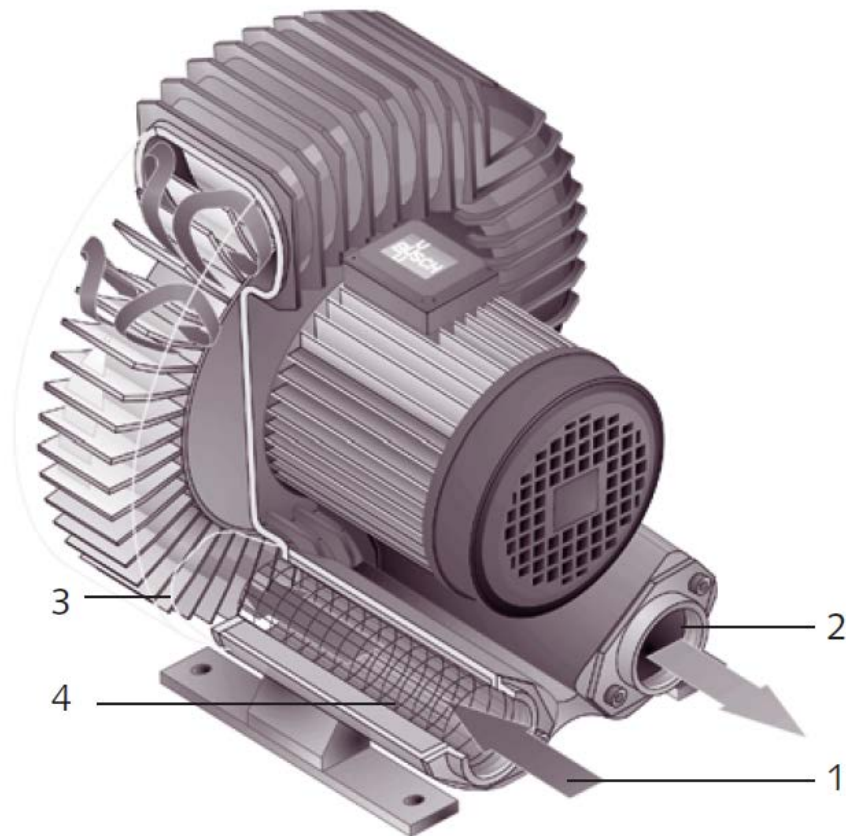
SVE Selection

- Regenerative Blower : 1-7" Hg, small, efficient, low cost. SVE only.
- Rotary Lobe: 1-15" Hg , loud, efficient, low cost
- Liquid ring 15-28" Hg, quiet, large, efficient, high cost
- Rotary Claw: 1- 25" Hg , small, loud, hot, high cost

Regenerative Blower

- Up to 7" Hg

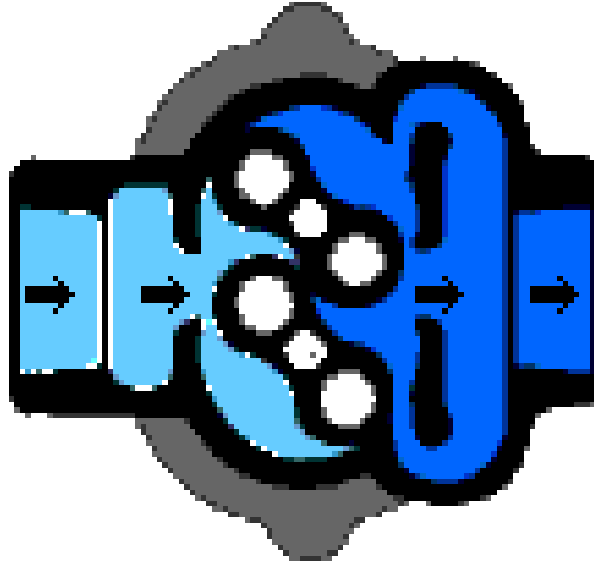
Single-stage version



Rotary Lobe Blower



Rotary Lobe Blower



- Typically 15" Hg maximum
 - Very noisy
 - Hot
- Susceptible to water carry-over

Rotary Claw Blower



Dual Phase Extraction – Oil Seal

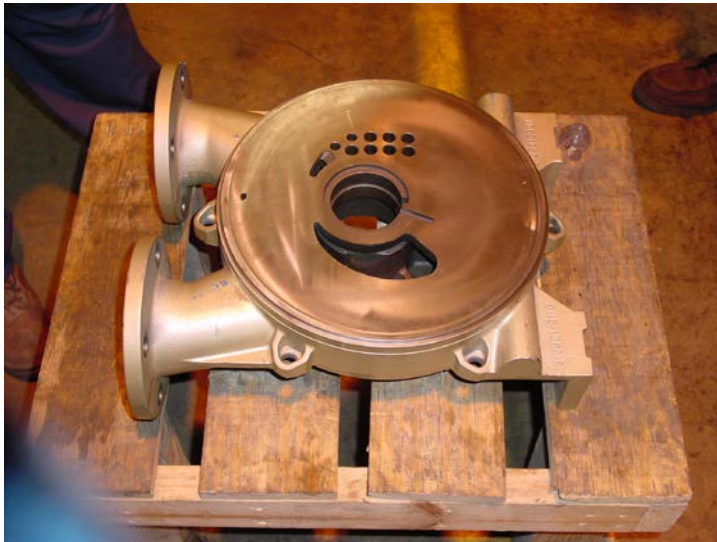
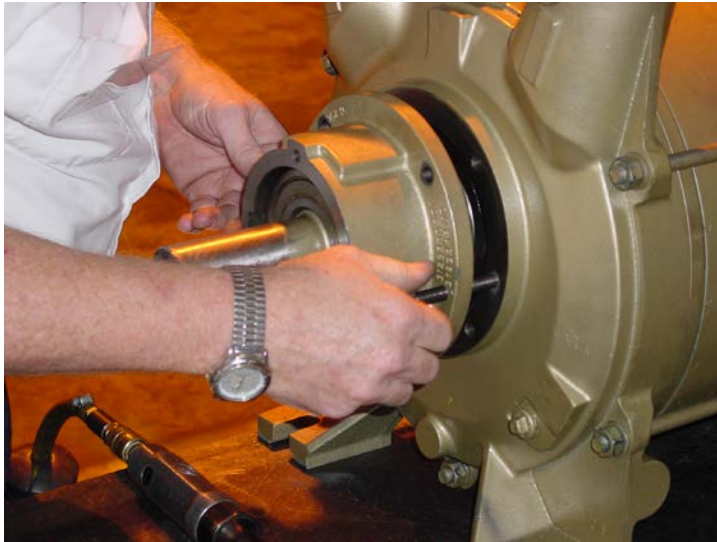


- **AWS-1 CLEAR PVC STILLING WELL & INLET**



- **40.0 HP LRP SKID**
- **500 ACFM AIR FLOW**

Inside the Liquid Ring Pump



- **SHAFT, SEAL, INLET PLATE & IMPELLER**



Oil Sealed Liquid Ring

- **Advantages:**

- Quiet
- No tap water required
- Self Contained

- **Disadvantages:**

- Constant 10-20 PPM oil concentration in exhaust stream
- High operating temperature, typically 180°

DPVE System Montgomery AL



Inefficiencies



Manifold

Inefficient: competing flows



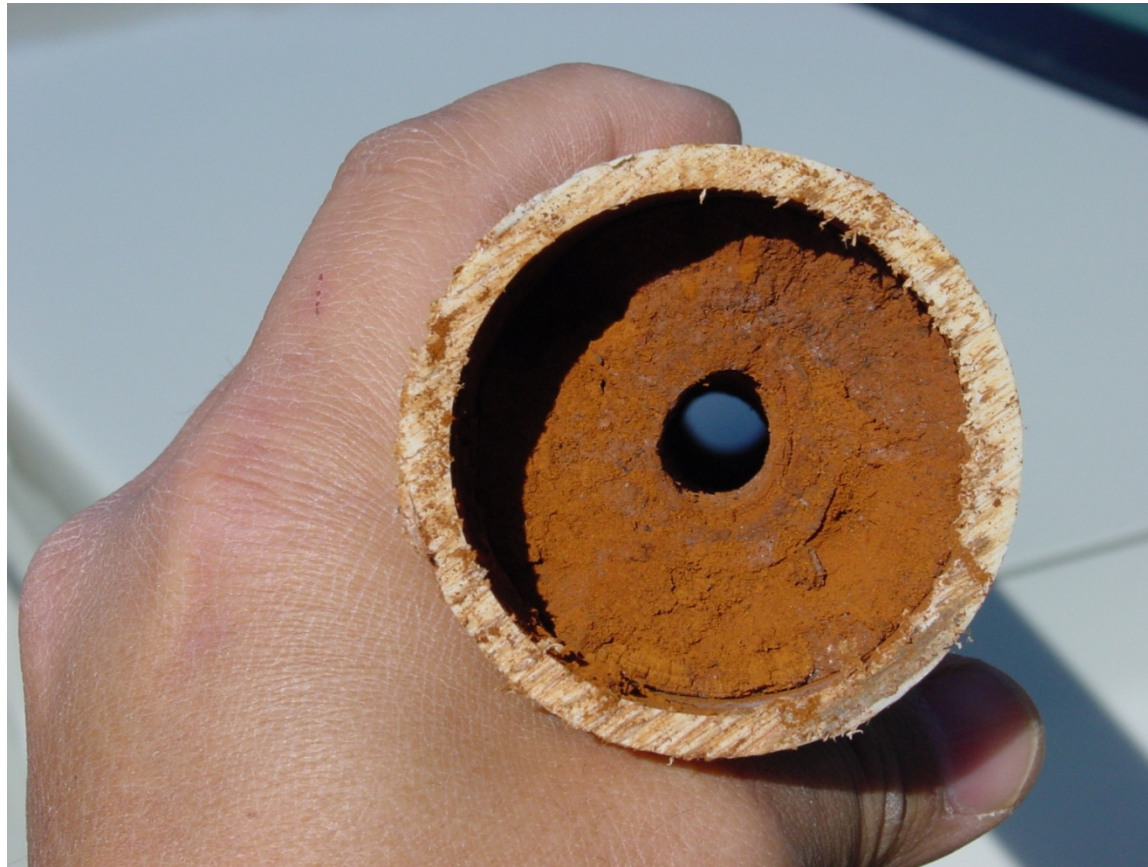
Good: Independent flows





Use long radius elbows vs short radius elbows

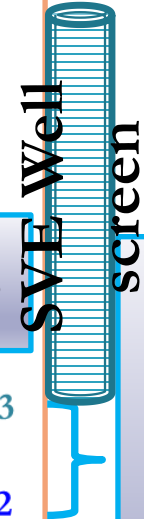
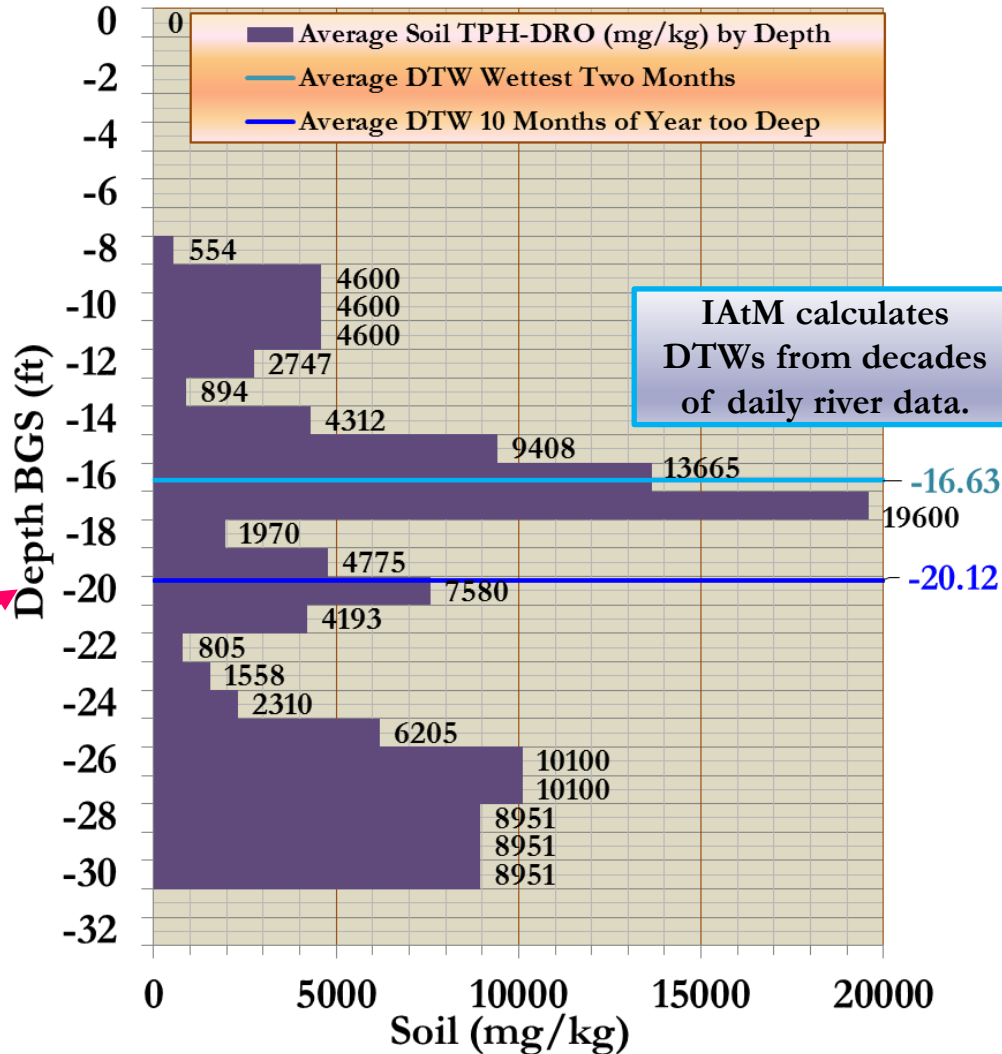
2" PVC PIPE REDUCED TO ½"
93% REDUCTION IN CROSS SECTION AREA



Understanding Gained from IAtM's **Advanced Data Analysis (ADA)** Assessments at nearly 100 Problem Sites Guides Remedial Selection.



Average Soil TPH-DRO (mg/kg) by Depth



100% SVE Systems evaluated were less effective at reducing mass in the intermediate vertical interval between the bottom of SVE well screen and lower water levels during the non wettest months.

IAtM calculates DTWs from decades of daily river data.

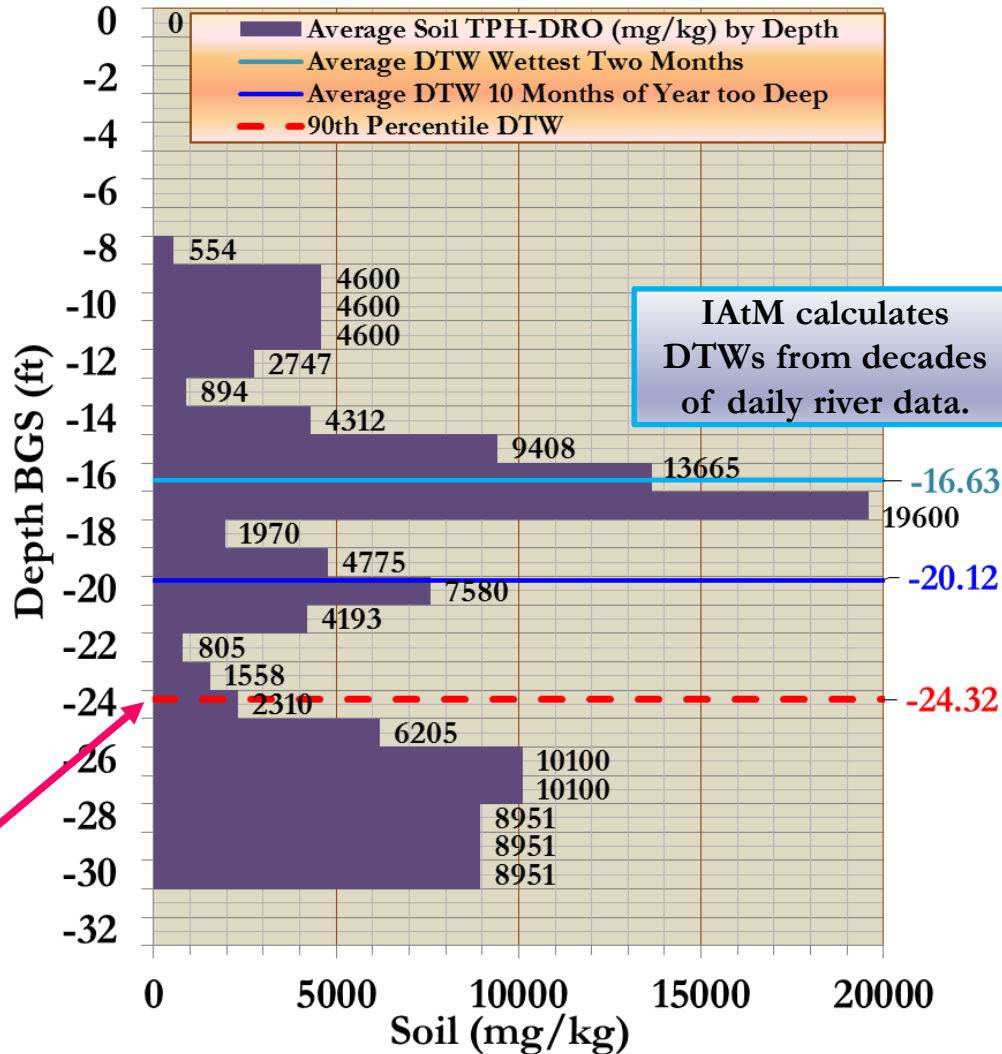
If mass exists above the average DTW during the non wettest months, then deeper wells and a DPE system capable of handling some water is needed.



Understanding Gained from IAtM's **Advanced Data Analysis (ADA)** Assessments at nearly 100 Problem Sites Guides Remedial Selection.



Average Soil TPH-DRO (mg/kg) by Depth



IAtM calculates DTWs from decades of daily river data.

If deep mass exists below the 90th percentile DTW, then an injection technology is also required.

100% of DPE Systems that operated 6+ years missed typically submerged deep mass.
79% of all DPE systems evaluated.



Louisiana site

Understanding Gained from IAtM's **Advanced Data Analysis (ADA)** Assessments at nearly 100 Problem Sites Reveals Common Design Short-falls.

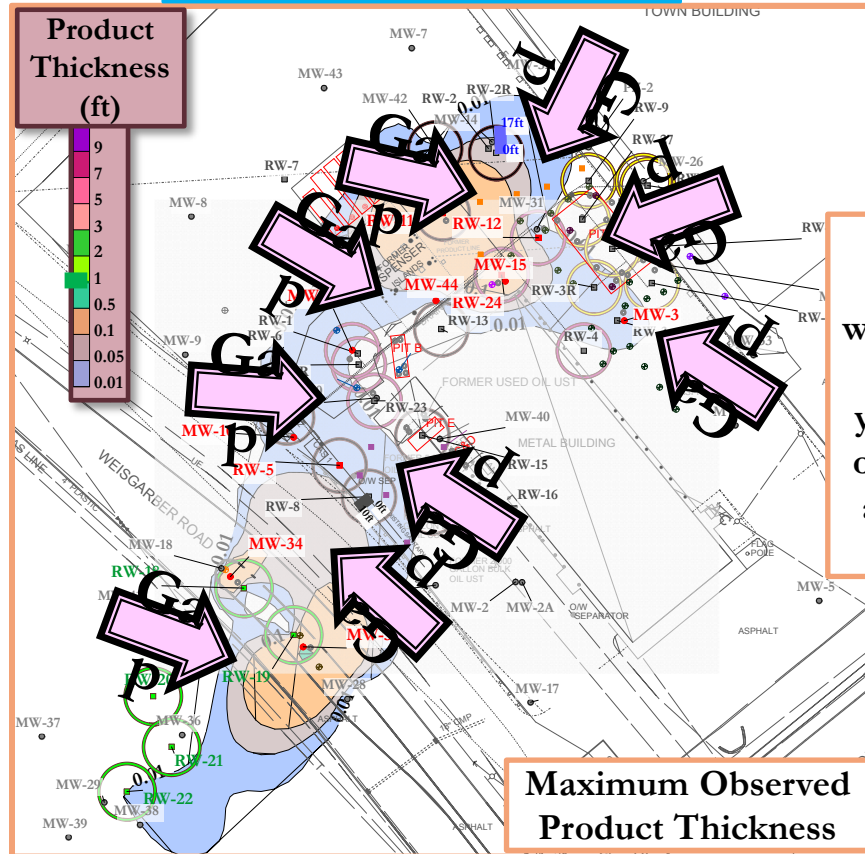
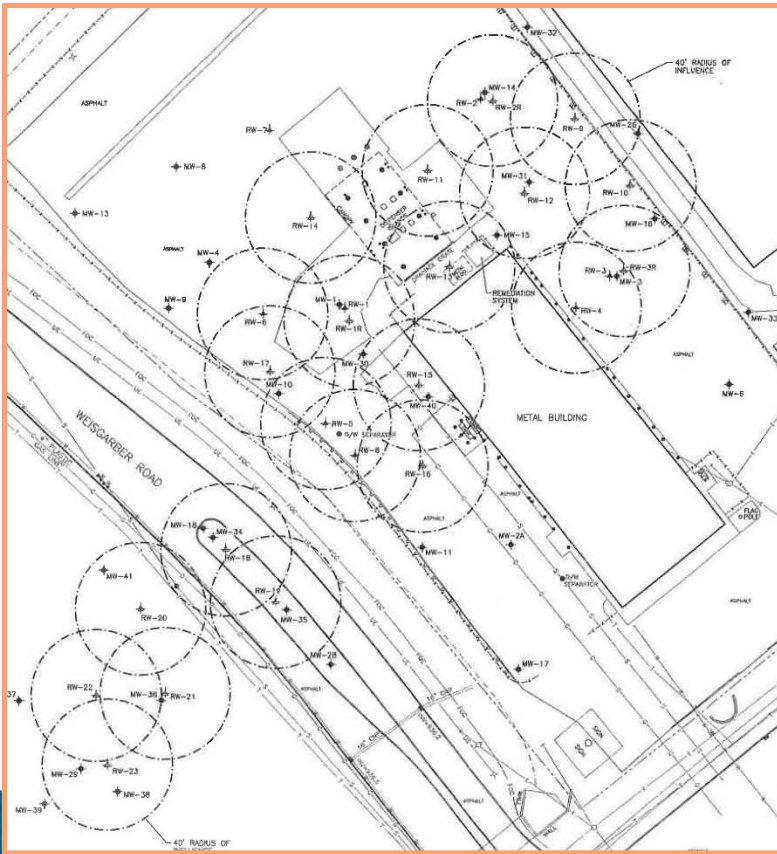
ADA discovers that **89% of DPE Systems** and **80% of all Remedies** evaluated overestimated design ROI leaving gaps in spatial coverage.



Design ROI of 40 feet

Actual ROI of 17 feet leaves many gaps in vapor recovery

ADA



Product remains at wells near gaps after many years of DPE operation and adding more wells.

Maximum Observed Product Thickness



HOW MUCH RISK IS ACCEPTABLE?



Mississippi Overview Pre 2015

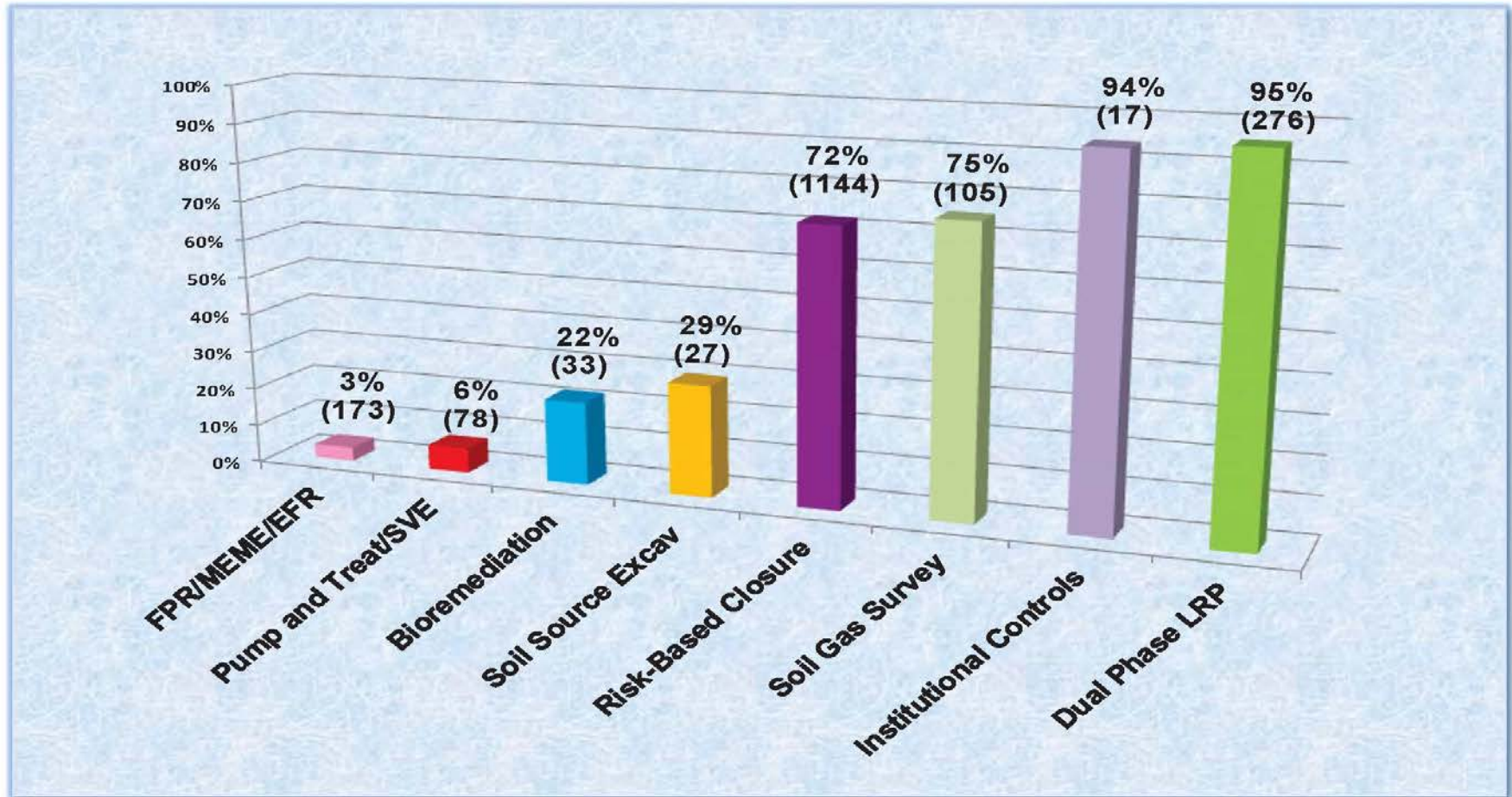
- Approximately 180 systems 2000- 2015
- 95+% Dual Phase
- 20-30 HP average system
- 70% <3.5 years
- 30% >6 years
- Few sites in the middle

Dual Phase Extraction

Evolution of Design

- Changed Standard Operating Procedure
- 25' ROI maximum, determines qty. of wells
- Well bottom and screen determined by PID readings, NOT current water table.
- Increase HP to 40, 50 or greater
- 3" piping, 4" wells
- Reevaluate at ~2.5 years
- Average clean up has decreased from 3.5 to 2.5 years

TDEC Closure Success Rate Based on Technology (2015)



Tennessee DPVE

- 2009 - 2015 purchased 190 DPVE (New)
- (83) 25 HP, (38) 30 HP & (69) 40 HP all DVPE (300-500 AFM)
- Trend is towards 40 all HP systems. Two locations with (3) x 40 hp systems in parallel.

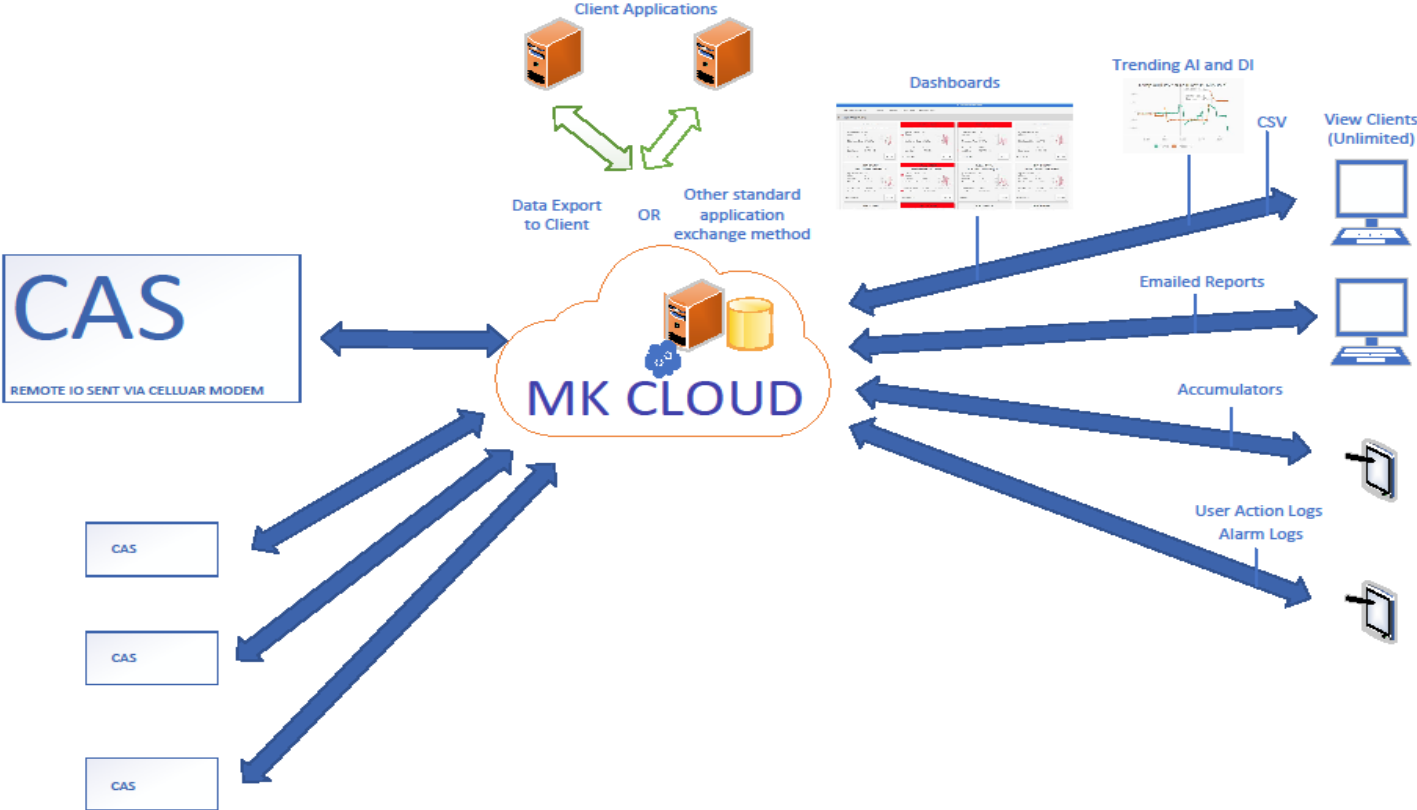
Contamination Sites Closed with DPVE

- 187 sites
- (40) were Drinking Water (DW) sites
- (111) were Free Product (FP) sites
- (10) were both DW & FP sites

- Average time to clean-up: **2.64 years**



MK SITE OPTIMIZATION SOFTWARE ARCHITECTURE

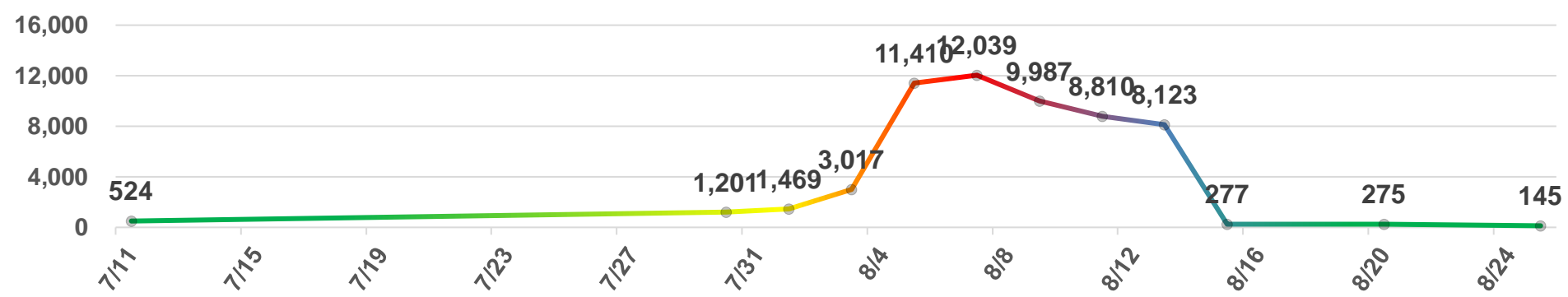


Let's start instrumenting some sites

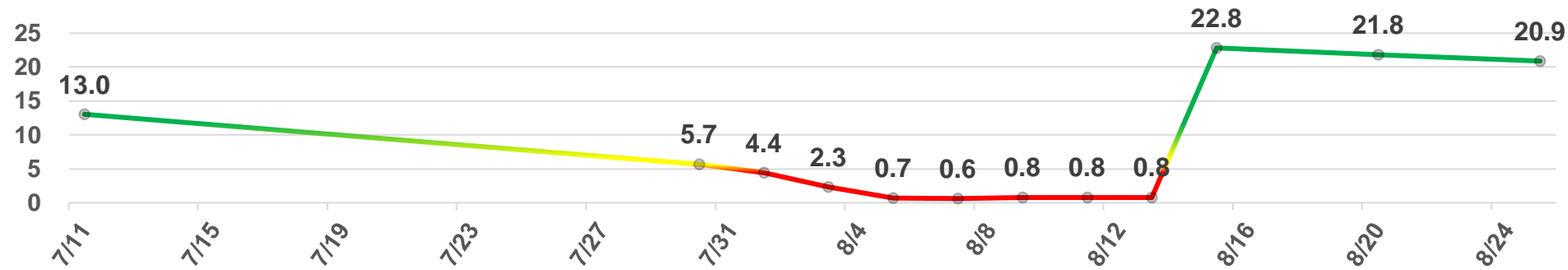


SITE OPTIMIZATION SOFTWARE (SOS)

SUMP TRANSFER PUMP CYCLE COUNTS



SUMP TRANSFER PUMP GALLONS/ CYCLE





SITE OPTIMIZATION SOFTWARE (SOS)

PREDICTIVE DATA ANALYSIS

- Early warning indicator of reduced
- Reduce downtime
- Significant Energy Cost savings
- Optimize personnel management
- Assist the Project manager in evaluations

General Trends

- Shorter Duration to Closure
- More realistic ROI and better screen placements
- Larger systems / higher flows. Time is money.
- More durable industrial equipment
- Piping and installation improvements
- Training, improved analytics
- Use of Multiple technologies, simultaneously or in series

MK ENVIRONMENTAL

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Special Thanks to TDEC, MDEQ and IATM



Design, Optimization, and Termination of Air-Based Remediation Technologies

LUST Corrective Action Webinar Series
November 16, 2021
Virtual Conference

Matthew A. Lahvis
Principal Engineer
Shell Global Solutions (US) Inc.

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This presentation contains forward-looking statements (within the meaning of the U.S. Private Securities Litigation Reform Act of 1995) concerning the financial condition, results of operations and businesses of Royal Dutch Shell. All statements other than statements of historical fact are, or may be deemed to be, forward-looking statements. Forward-looking statements are statements of future expectations that are based on management’s current expectations and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in these statements. Forward-looking statements include, among other things, statements concerning the potential exposure of Royal Dutch Shell to market risks and statements expressing management’s expectations, beliefs, estimates, forecasts, projections and assumptions. These forward-looking statements are identified by their use of terms and phrases such as “aim”, “ambition”, “anticipate”, “believe”, “could”, “estimate”, “expect”, “goals”, “intend”, “may”, “objectives”, “outlook”, “plan”, “probably”, “project”, “risks”, “schedule”, “seek”, “should”, “target”, “will” and similar terms and phrases. There are a number of factors that could affect the future operations of Royal Dutch Shell and could cause those results to differ materially from those expressed in the forward-looking statements included in this presentation, including (without limitation): (a) price fluctuations in crude oil and natural gas; (b) changes in demand for Shell’s products; (c) currency fluctuations; (d) drilling and production results; (e) reserves estimates; (f) loss of market share and industry competition; (g) environmental and physical risks; (h) risks associated with the identification of suitable potential acquisition properties and targets, and successful negotiation and completion of such transactions; (i) the risk of doing business in developing countries and countries subject to international sanctions; (j) legislative, fiscal and regulatory developments including regulatory measures addressing climate change; (k) economic and financial market conditions in various countries and regions; (l) political risks, including the risks of expropriation and renegotiation of the terms of contracts with governmental entities, delays or advancements in the approval of projects and delays in the reimbursement for shared costs; (m) risks associated with the impact of pandemics, such as the COVID-19 (coronavirus) outbreak; and (n) changes in trading conditions. No assurance is provided that future dividend payments will match or exceed previous dividend payments. All forward-looking statements contained in this presentation are expressly qualified in their entirety by the cautionary statements contained or referred to in this section. Readers should not place undue reliance on forward-looking statements. Additional risk factors that may affect future results are contained in Royal Dutch Shell’s Form 20-F for the year ended December 31, 2020 (available at www.shell.com/investor and www.sec.gov). These risk factors also expressly qualify all forward-looking statements contained in this presentation and should be considered by the reader. Each forward-looking statement speaks only as of the date of this presentation, November 16, 2021. Neither Royal Dutch Shell plc nor any of its subsidiaries undertake any obligation to publicly update or revise any forward-looking statement as a result of new information, future events or other information. In light of these risks, results could differ materially from those stated, implied or inferred from the forward-looking statements contained in this presentation.

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Outline

- why air-phase remediation
- design considerations
 - soil vapor extraction (SVE)
 - air sparging (AS)
 - multi-phase extraction (MPE)
 - bioventing/biosparging
- “Exit Strategy Toolkits”
 - case for change
 - contents/recommendations



air treatment (thermal oxidizers) for soil vapor extraction (SVE) system - Hartford, Illinois

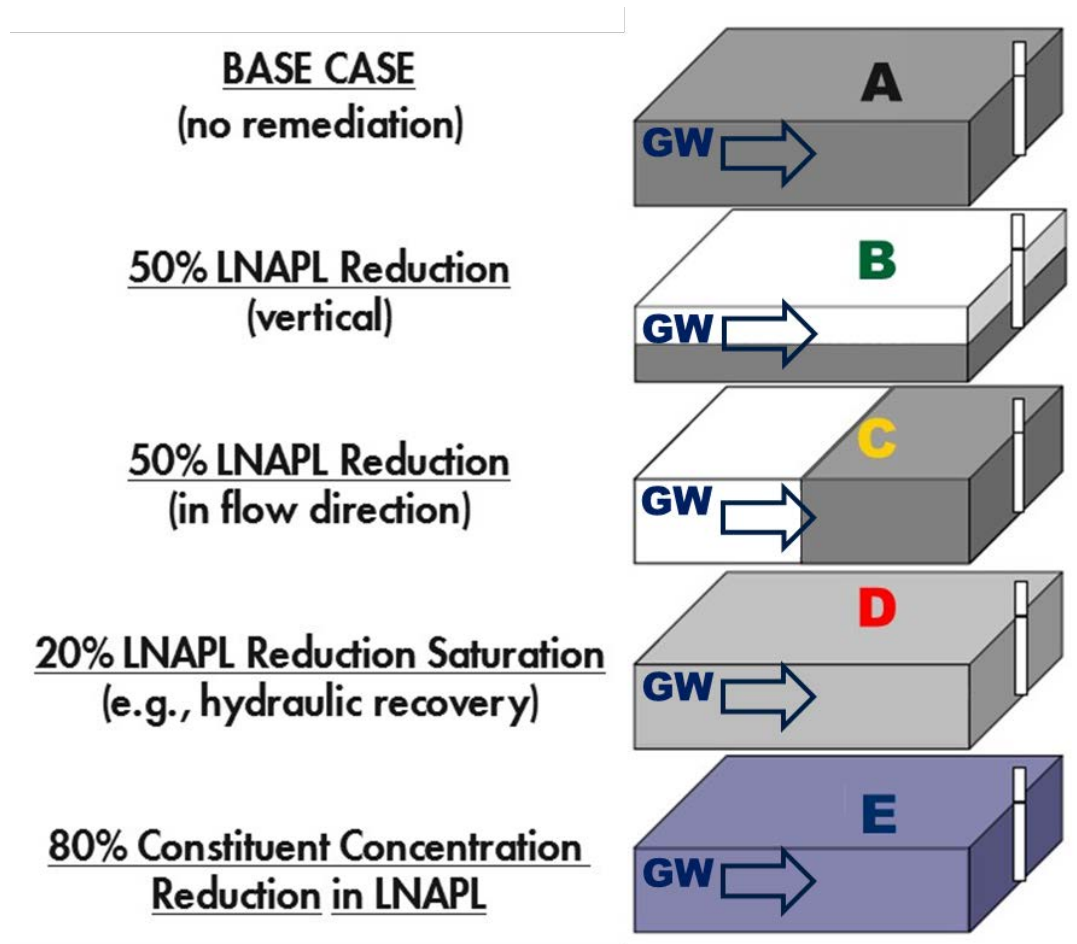
GOALS:

- ✓ provide a few general design considerations for air-phase remediation
- ✓ highlight a sustainable approach to air-phase remediation

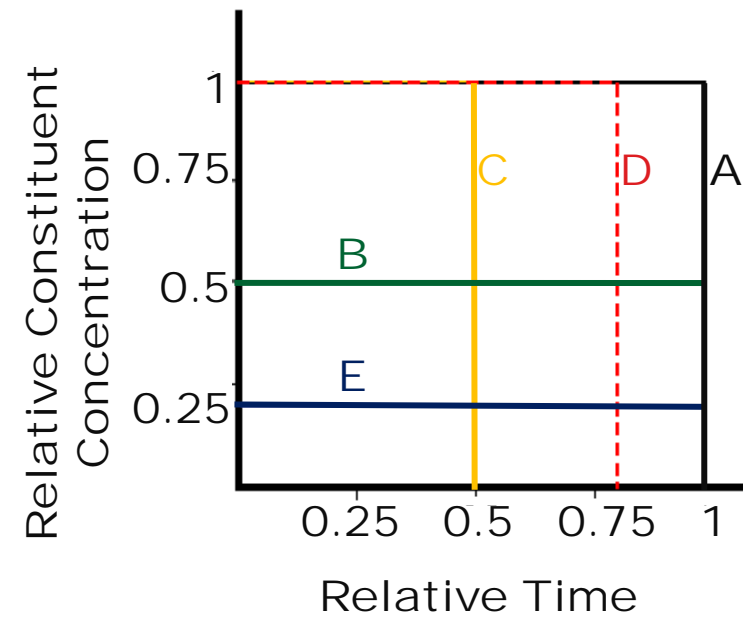
BACKGROUND – AIR PHASE
REMEDIATION

1.0

Motivation Behind Selecting Air-Based Technology: LNAPL Recovery vs. Concentration and Plume Longevity



from ITRC, 2009



KEY POINT | air-based remediation technologies affect composition (risk)

* assumes groundwater flow is left to right, plug flow through the source, equilibrium dissolution, and no biodegradation

Geotracker Study – 12,000+ sites (McHugh et al. 2013)

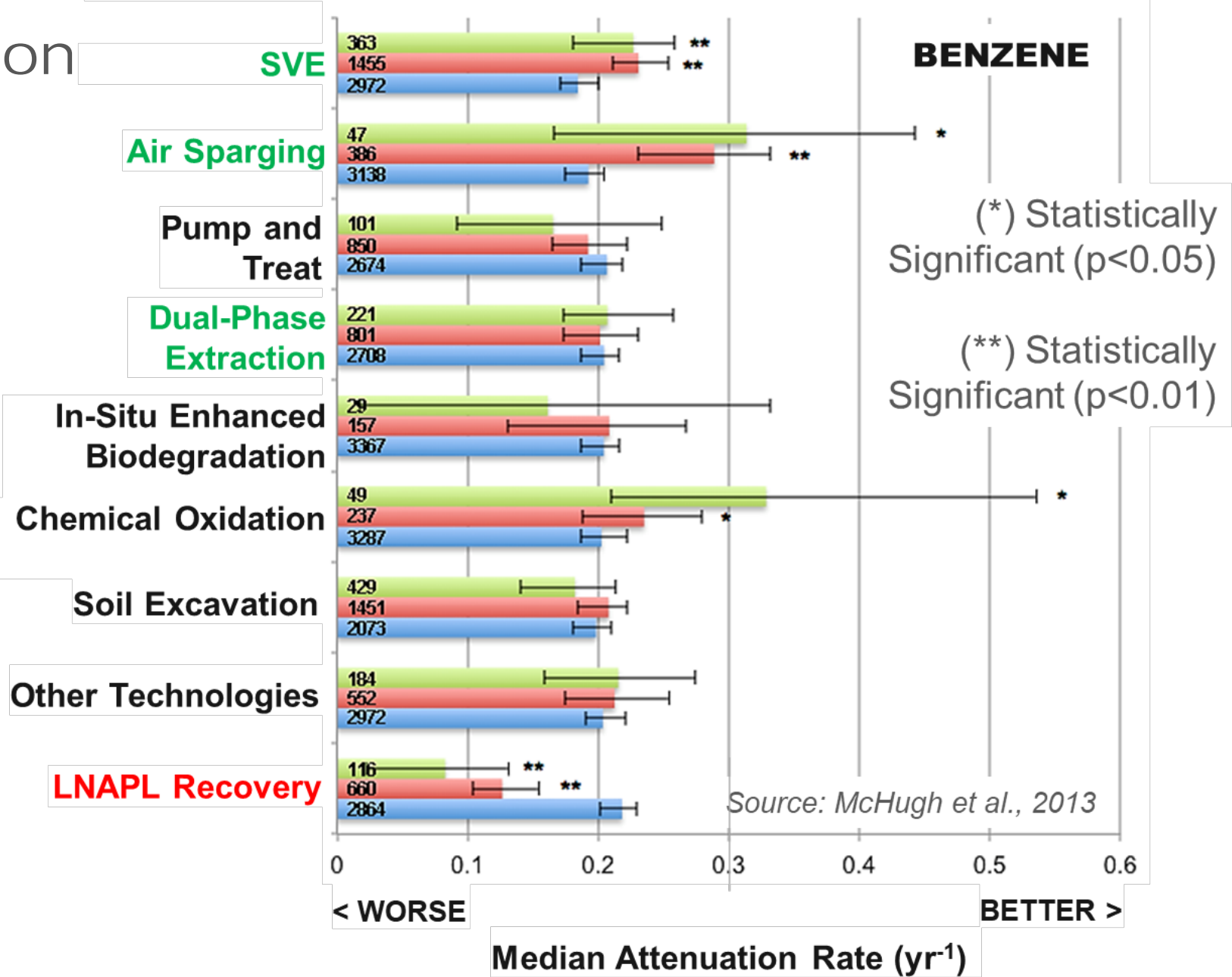
Air-Based Remediation More Effective Than LNAPL Recovery:

Effect of Remediation Technology on Source Attenuation Rate

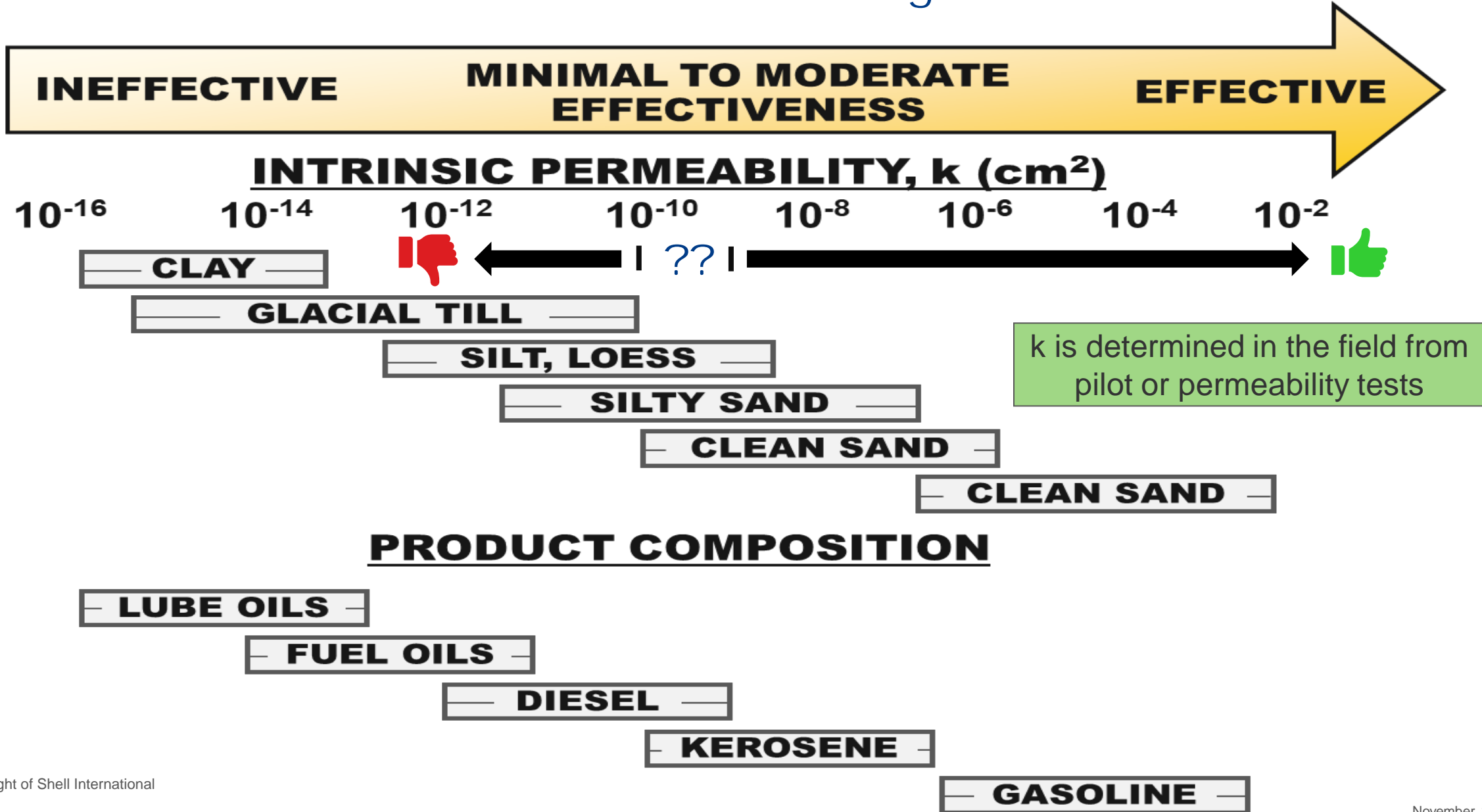
Legend

- n Sites with Only Technology
- n Sites with Technology and Some Other Technology
- n Sites without Technology

KEY POINT | air-based remediation technologies enhance attenuation rates



Design Considerations/Issues: Air Phase Remediation Technologies



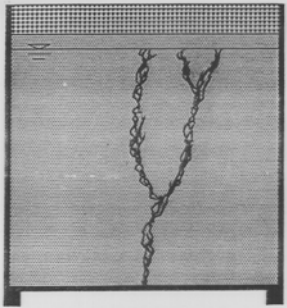
AIR SPARGING

2.0

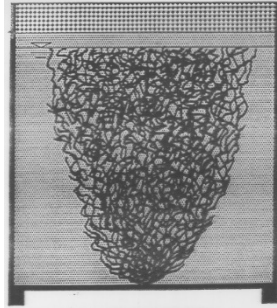
Design Considerations/Issues: Air Sparging

FLOW VISUALIZATIONS

LOW INJECTION RATE



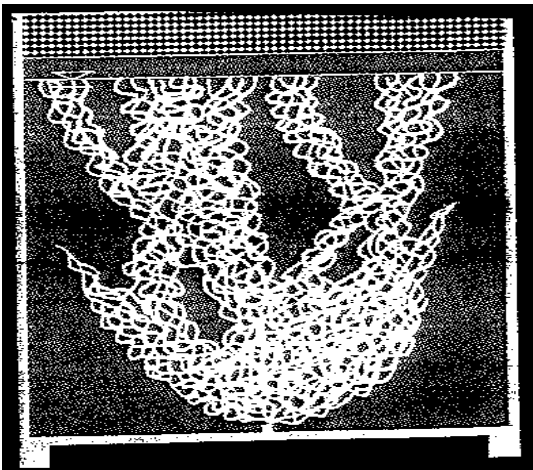
HIGH INJECTION RATE



Ji et al. (1993)

- air channels generally collapse to fewer conduits over time
- can be overcome to a degree by pulsing
- small scale heterogeneities can greatly affect airflow

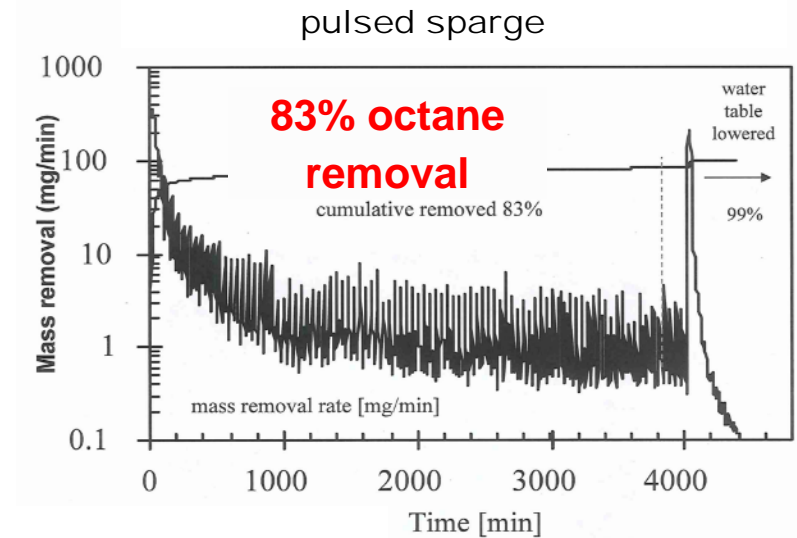
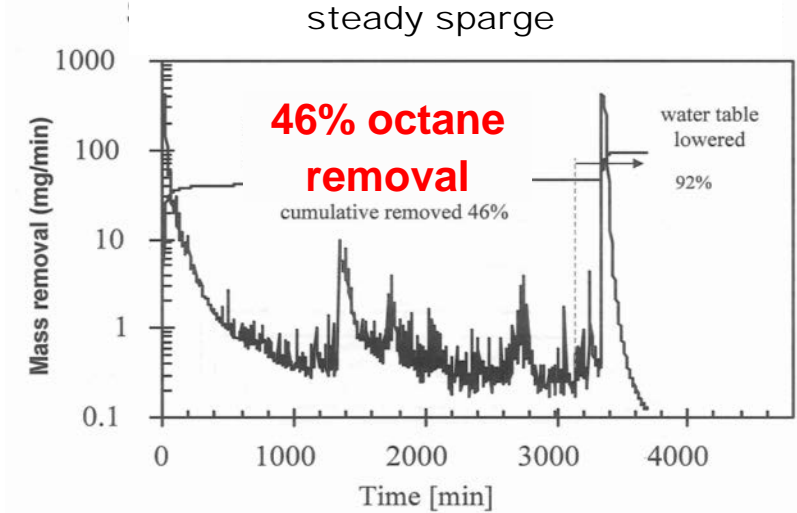
AIRFLOW AFFECTED BY SMALL-SCALE HETEROGENEITY



KEY POINT

pulsed, high injection-rate sparging (e.g., 1 – 8 pulses/day) generally improves air distribution over continuous sparging

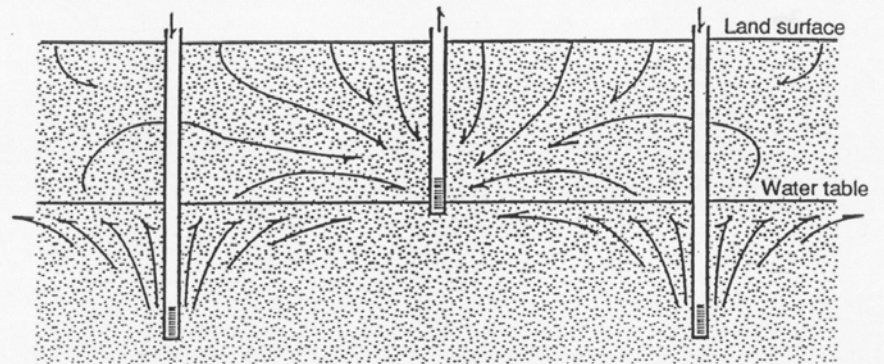
STEADY VS. PULSED



Bruce (written communication)

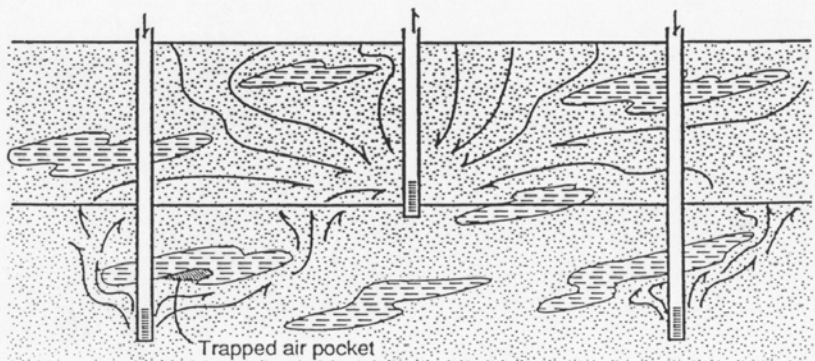
Design Considerations/Issues: Air Sparging

IDEAL AIR FLOW

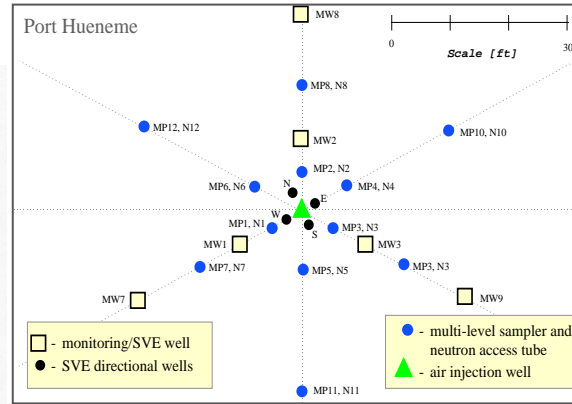


Air sparging and soil venting under isotropic conditions

REALITY



Air sparging and soil venting under heterogeneous conditions



geyser at MW -- took about a month to depressurize after AS turned off...took 6 months for MW located ~1000 ft away from nearest sparge point to depressurize post AS shut down

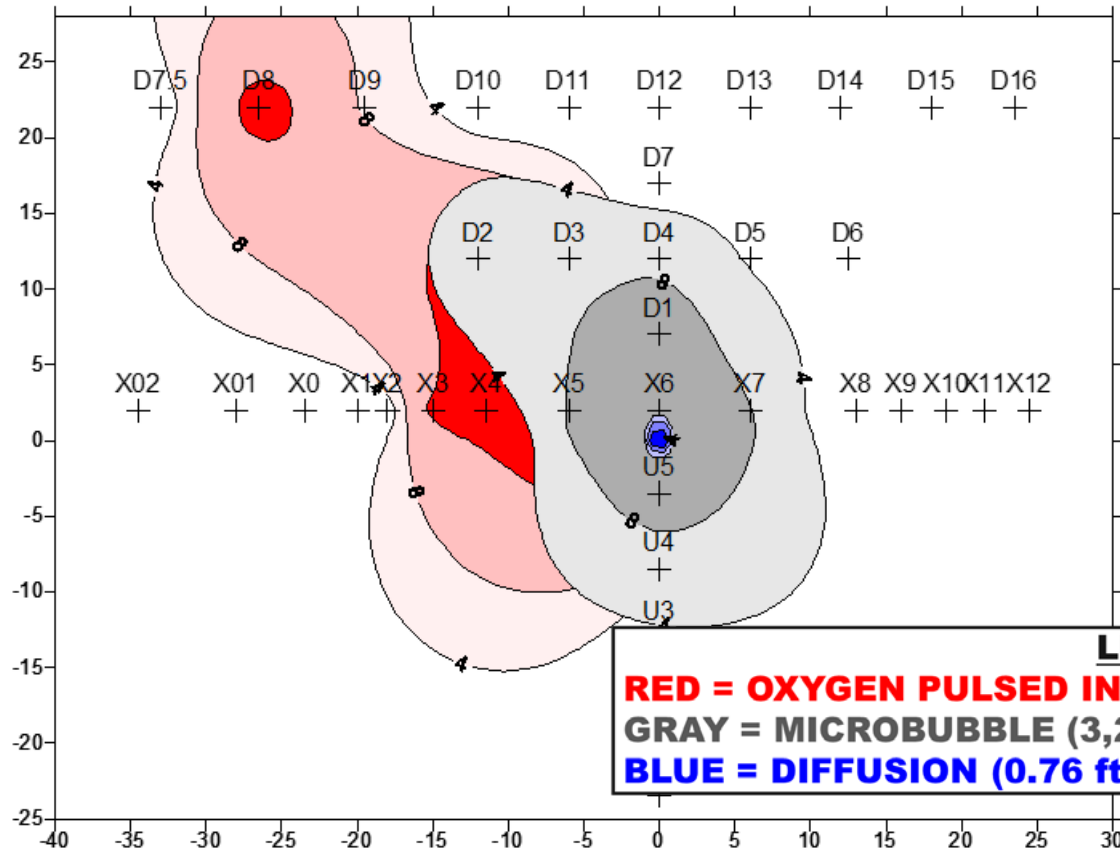


Figure 13. Evidence of IAS Impact

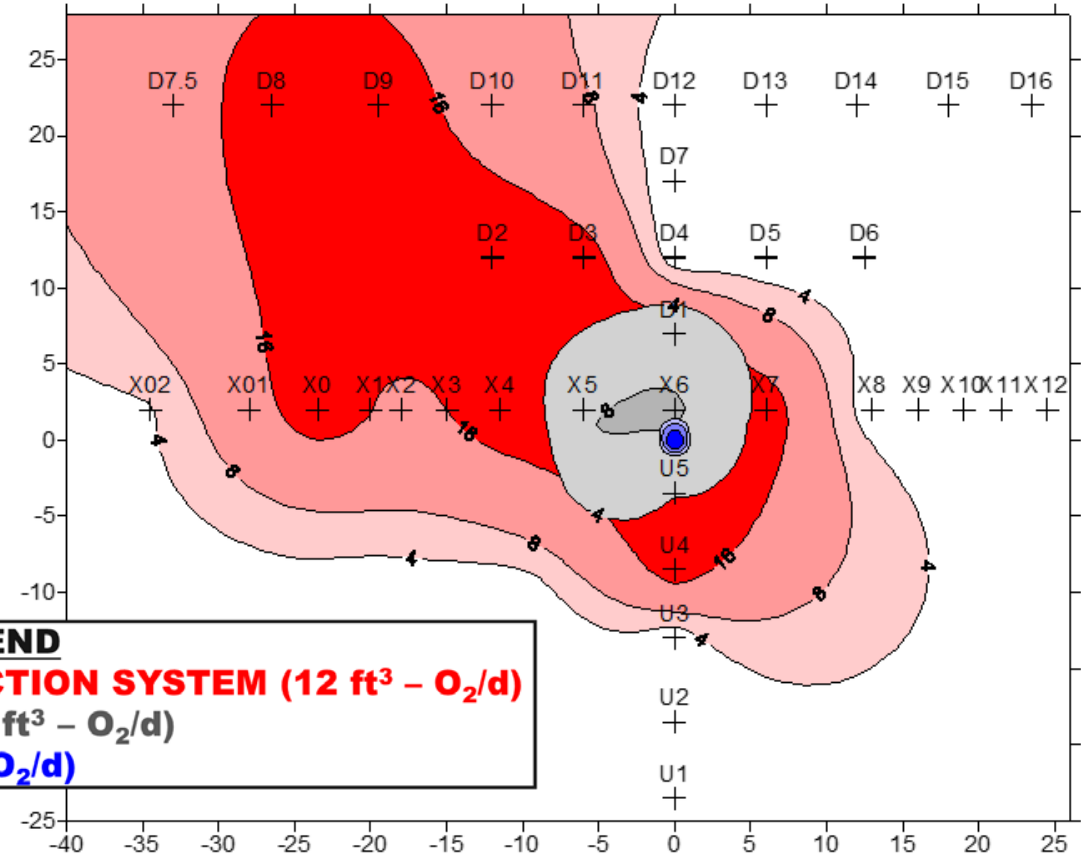
air distribution is often variable, making monitoring a challenge

Design Considerations/Issues: O₂ Delivery

O₂ Distribution Shallow Aquifer @ 18 Weeks



O₂ Distribution Deep Aquifer @ 18 Weeks

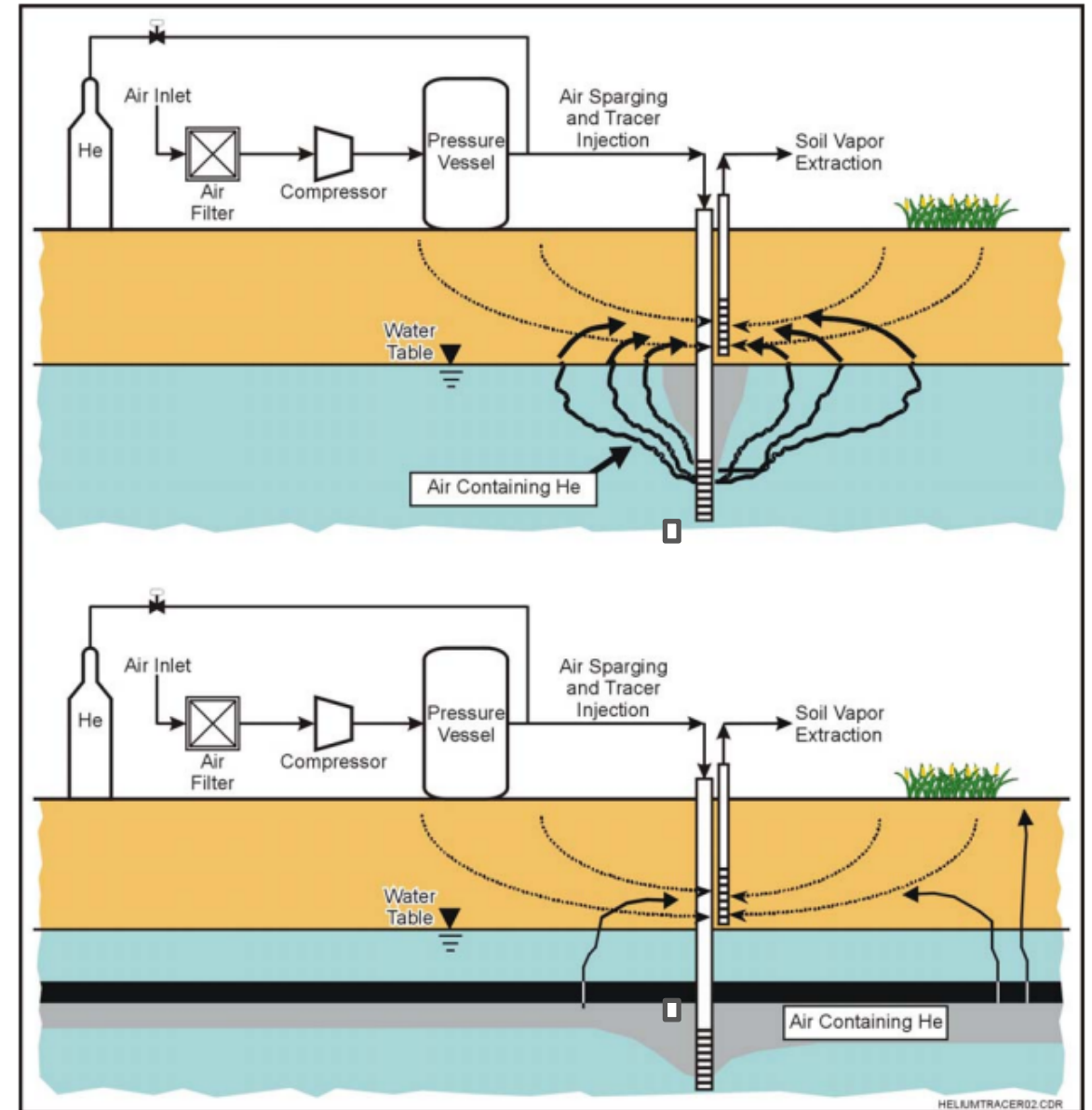


KEY POINT

- must understand O₂ demand
- how you inject is important

Other Design Considerations/Issues: Air Sparging

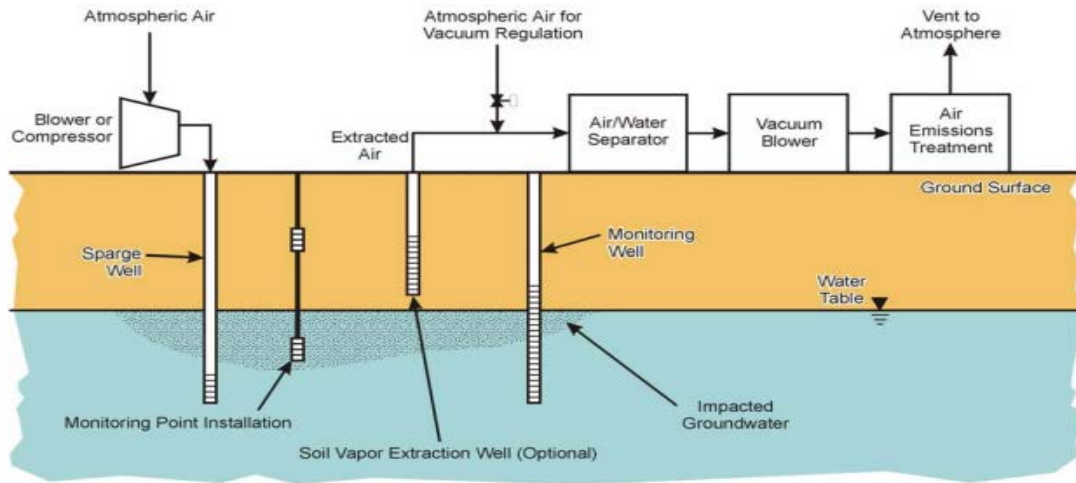
- ✓ **injection wells not properly developed** - often see monitoring wells developed but sparge wells get ignored
- ✓ **injection wells silting up, especially under pulsing conditions** - can be addressed, in part, using blank casing at the bottom of the sparge well
- ✓ **iron precipitation** - can be an issue if concentrations in groundwater exceed 10 – 20 mg/L
- ✓ **well completion not competent, especially for pulsed or biosparging injection** - can be addressed, in part, by completing the wells with a bentonite/cement mixture



SOIL VAPOR EXTRACTION

3.0

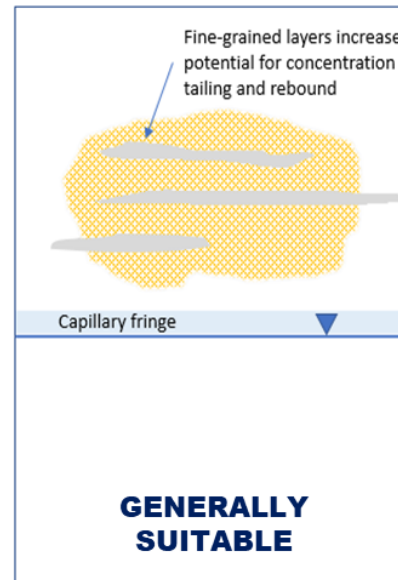
Design Considerations: Soil Vapor Extraction (SVE)



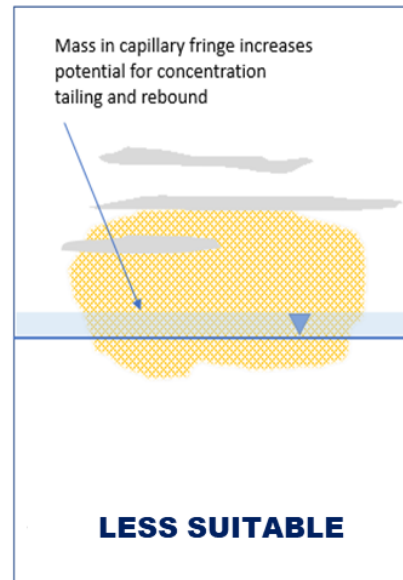
- the more LNAPL mass is distributed above the water table, the better (little remediation of confined/submerged sources – must couple w/ AS)
- difficult to remediate mass in low-permeability soils (rebound) - rebound testing (soil-gas monitoring after system shut down) recommended for validation
- other challenges: GW mounding/large fluctuations in water table, short circuiting, frozen condensate lines
- SVE recommended as an alternative to sub-slab depressurization for VI mitigation

Relative Applicability vs. General Contaminant Mass Distribution

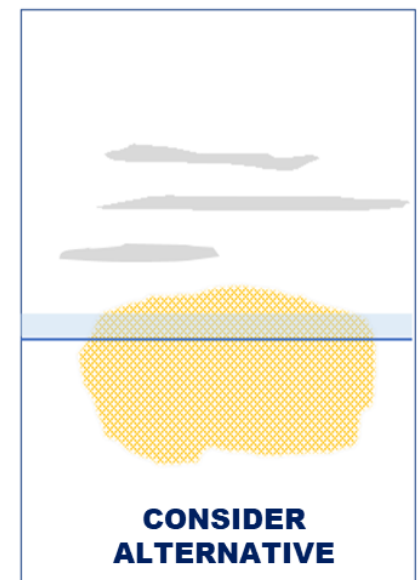
TYPE 1: contaminant mass in vadose zone



TYPE 2: contaminant mass near the water table



TYPE 3: contaminant mass generally below the water table



adapted from Truex et al. (2013)

Design Considerations: Soil Vapor Extraction (SVE)

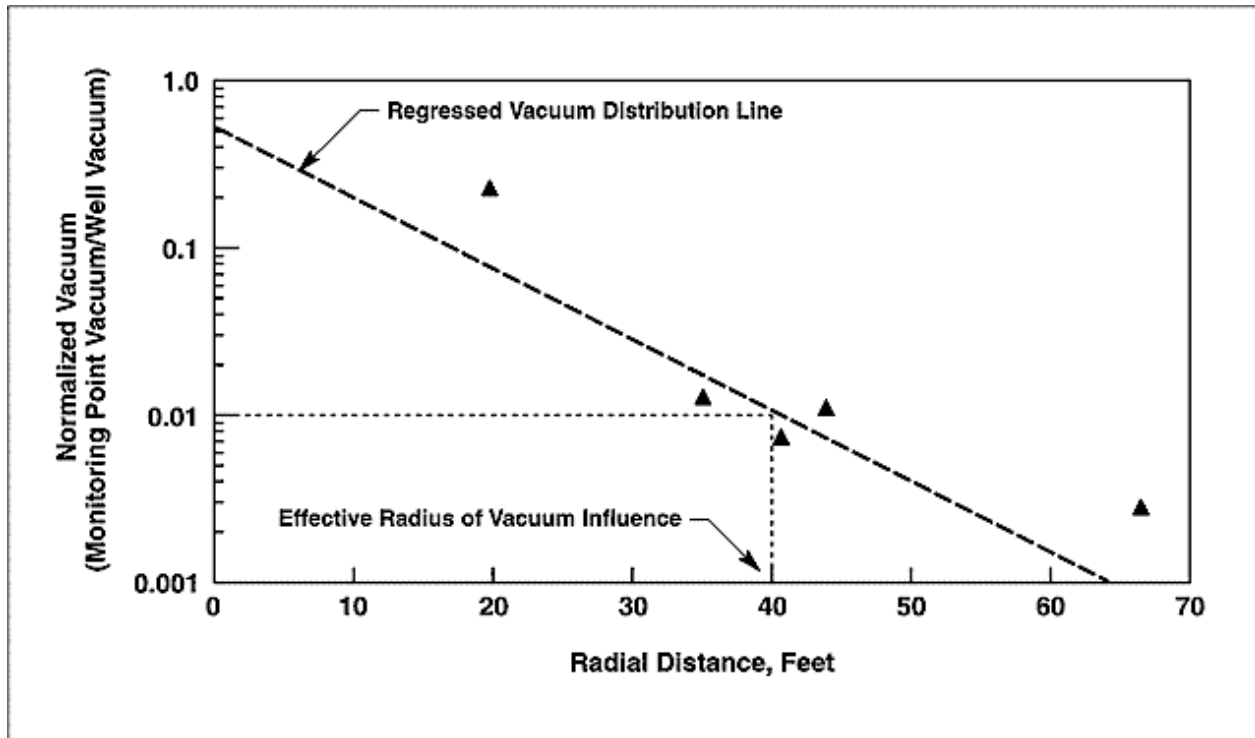
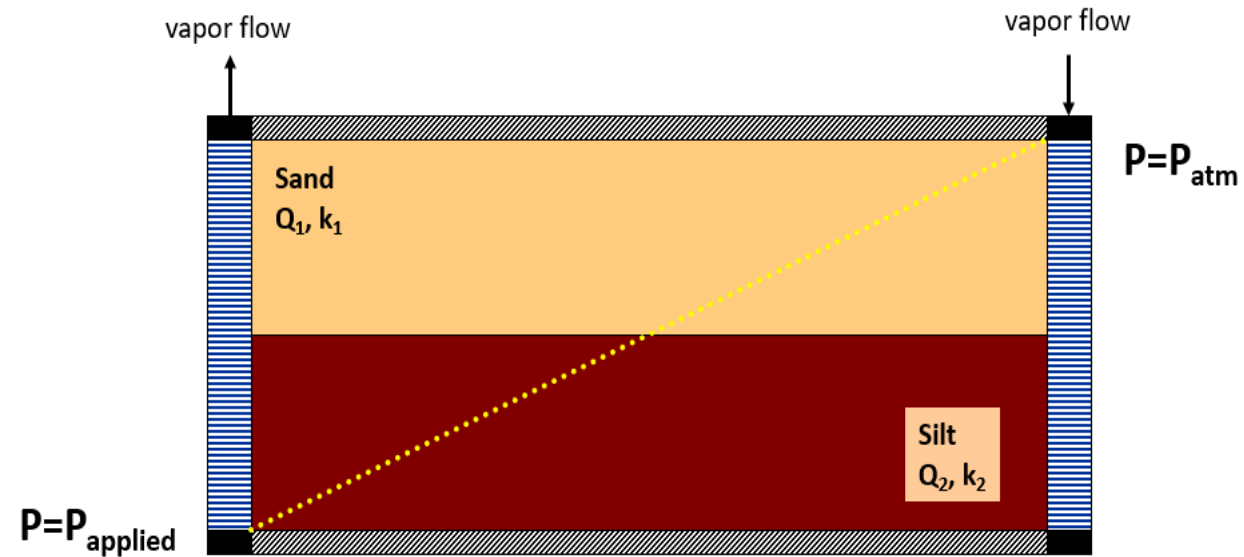


Fig. 7 – Effective Radius of Vacuum Influence Normalized Pilot Test Vacuum Data Plot

- ROI can extend beyond where vacuum is measurable
 - soil-gas (O_2 , CO_2 , COCs) concs vs. time
 - tracers (He , SF_6) are relatively easy/repeatable
 - temperature can be used as an indicator of ROI and to assess total mass removal (e.g., nested thermistors) monitoring (flow, concs) (Sweeney and Ririe, 2014)



KEY POINT

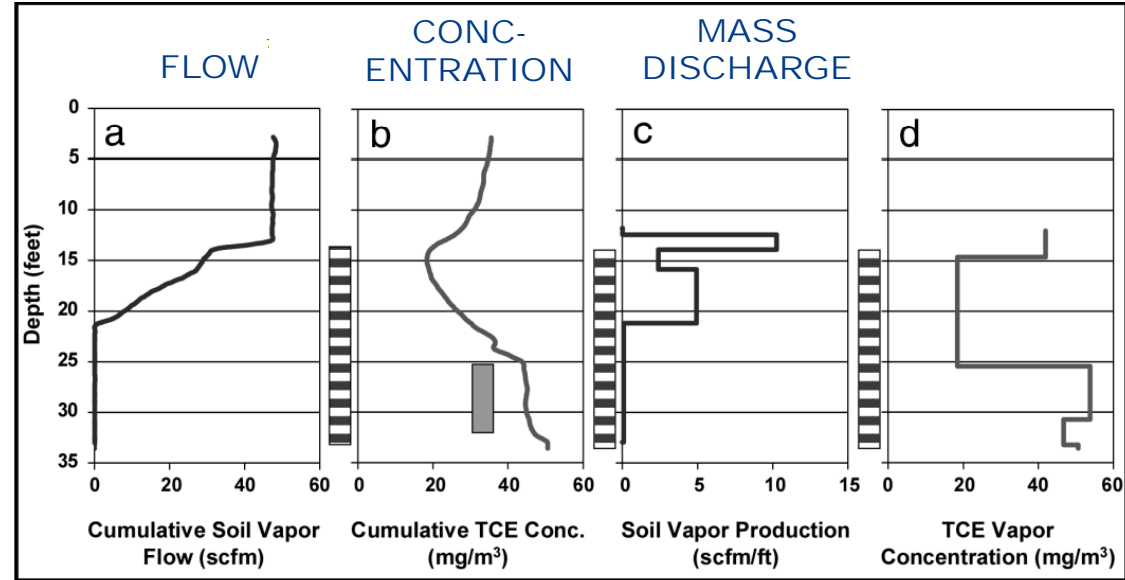
- vacuum \neq flow
- tracers and temperature measurements can be beneficial for assessing ROI

Design Considerations: Soil Vapor Extraction (SVE)

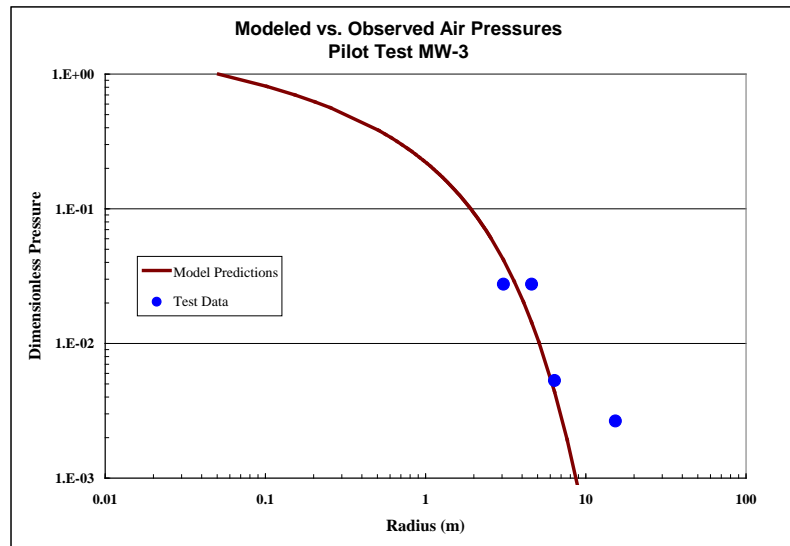
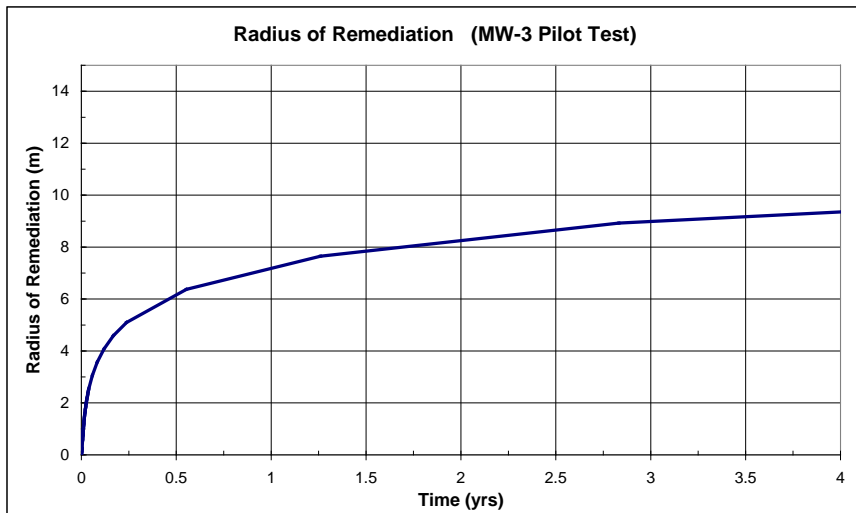
- optimize via extraction well-specific monitoring/regulation (flow, concs)
 - conduct profiling of in-well flow & contaminant concentrations under active extraction
 - pilot testing and simple spreadsheet models to design well configurations



MASS DISCHARGE ESTIMATES
CONCENTRATION & FLOW PROFILING

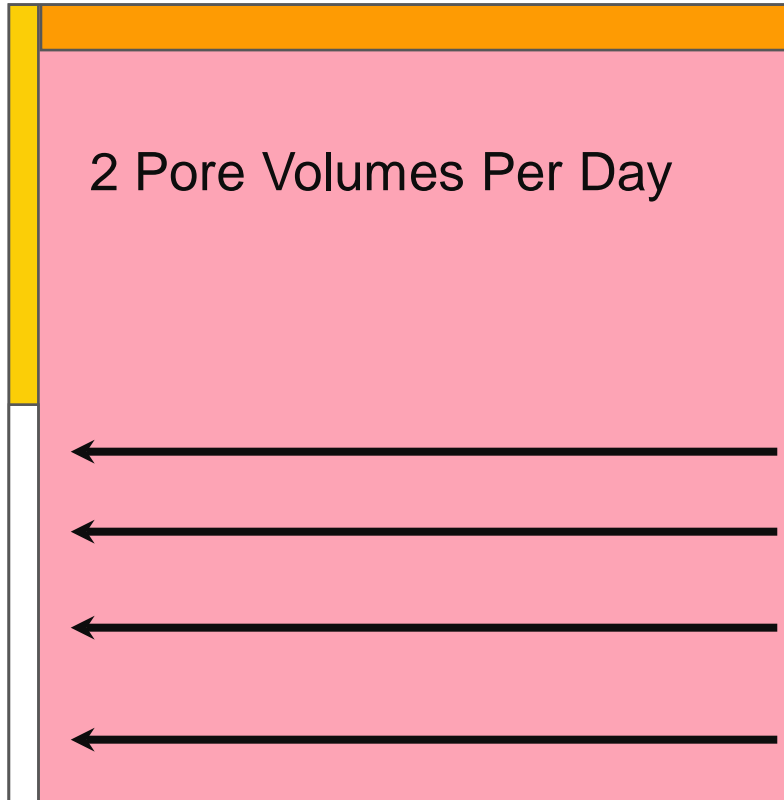


USEPA (2000)

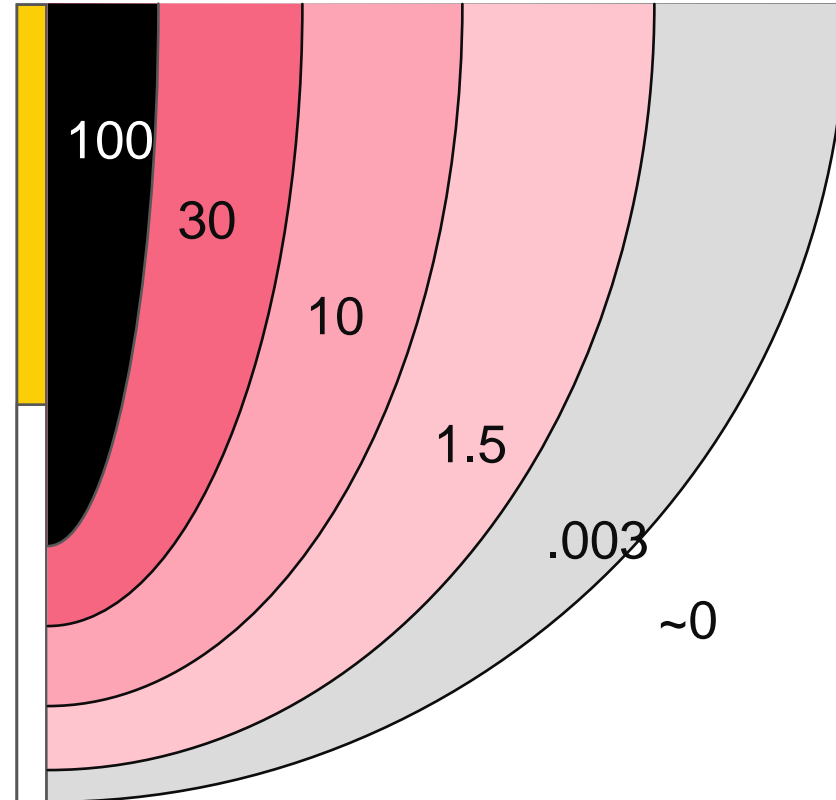


Design Considerations: Soil Vapor Extraction (SVE)

SEALED SURFACE



OPEN SURFACE



**KEY
POINT**

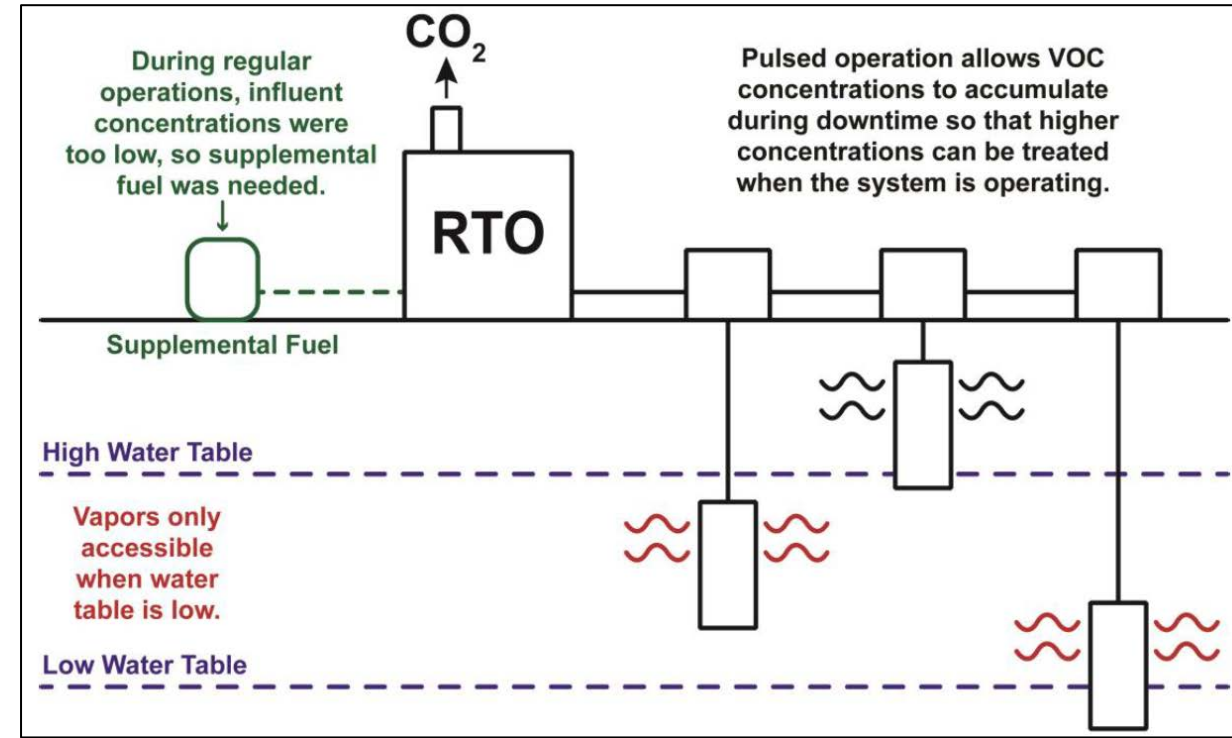
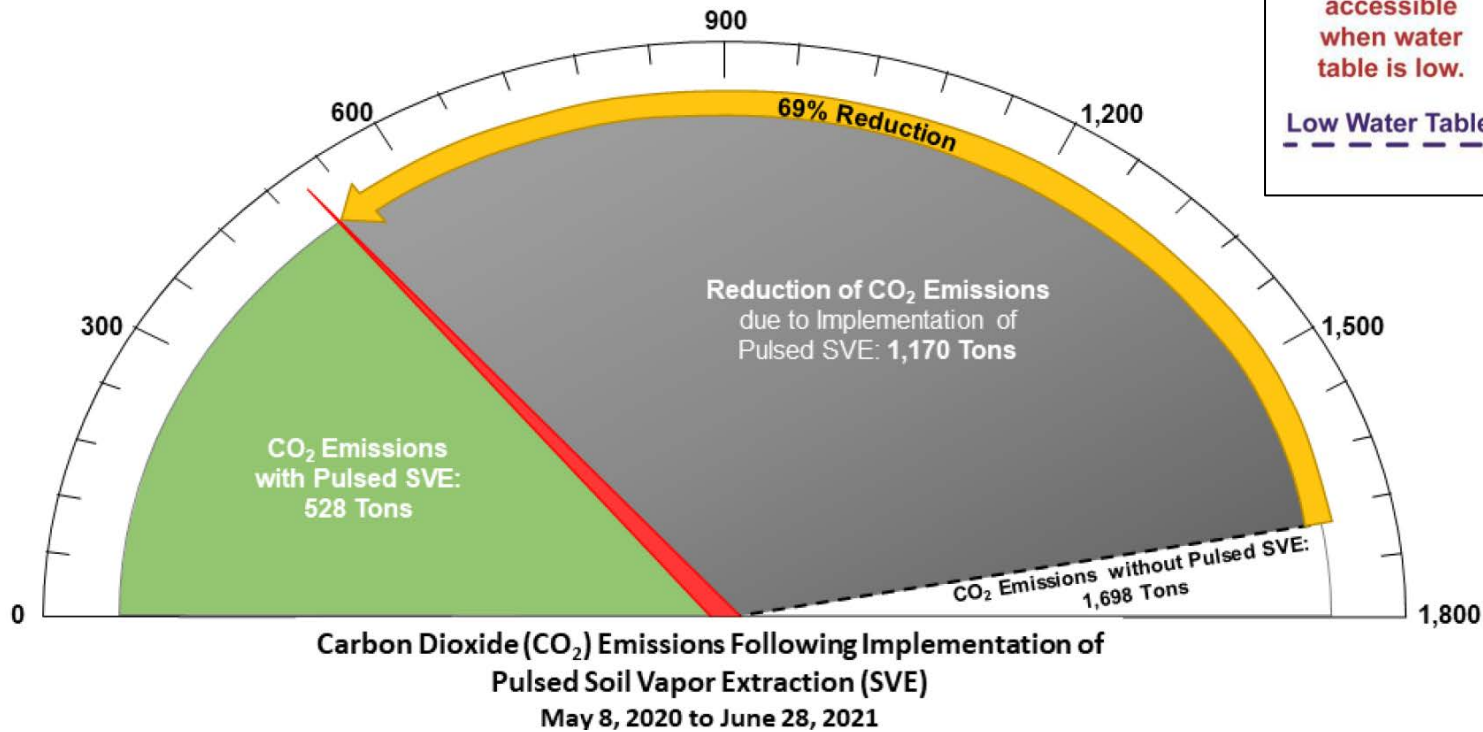
surface cover, soil layering can greatly affect air distribution and clean-up times

Pulsed SVE: A Sustainable Remediation Alternative

CO₂ emissions (~1 year, 1 site)

- without pulsed SVE = 1,698 tons CO₂
- with pulsed SVE = 528 tons CO₂

69%
reduction
in CO₂
emissions



MULTI-PHASE EXTRACTION

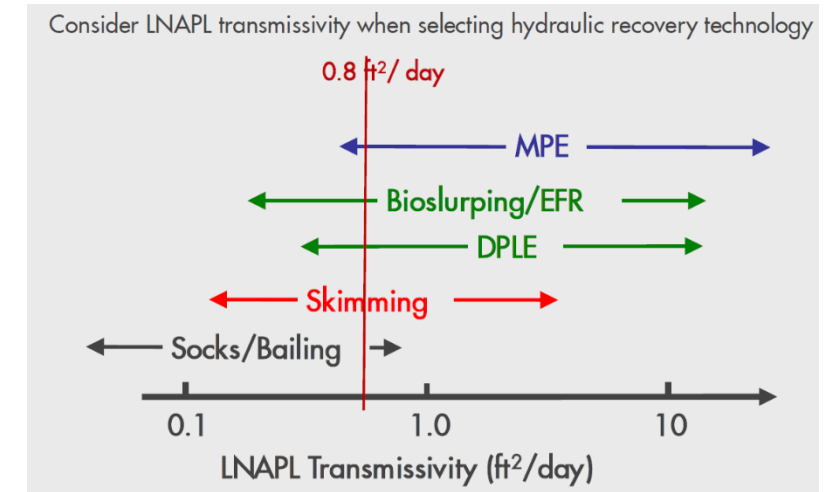
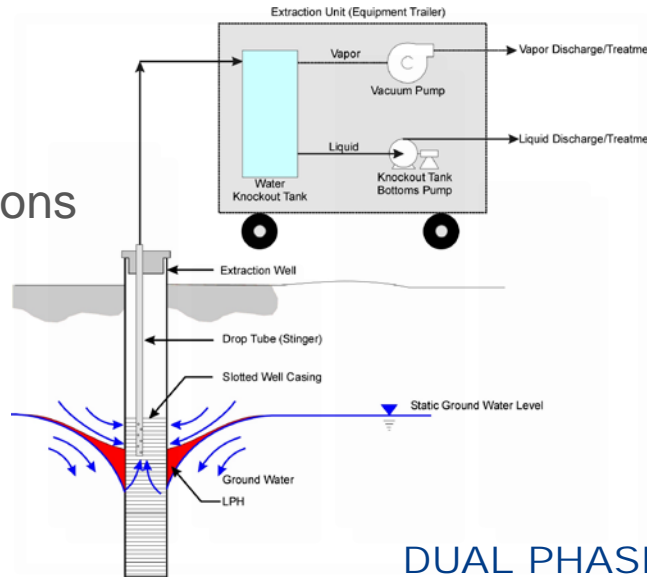
Dual Phase Extraction, Bioslurping,
Vacuum Extraction/Groundwater
Extraction (VE/GE), Vacuum-Enhanced
Recovery or Skimming

4.0

MPE: General Applications and Observations

GENERAL APPLICATIONS

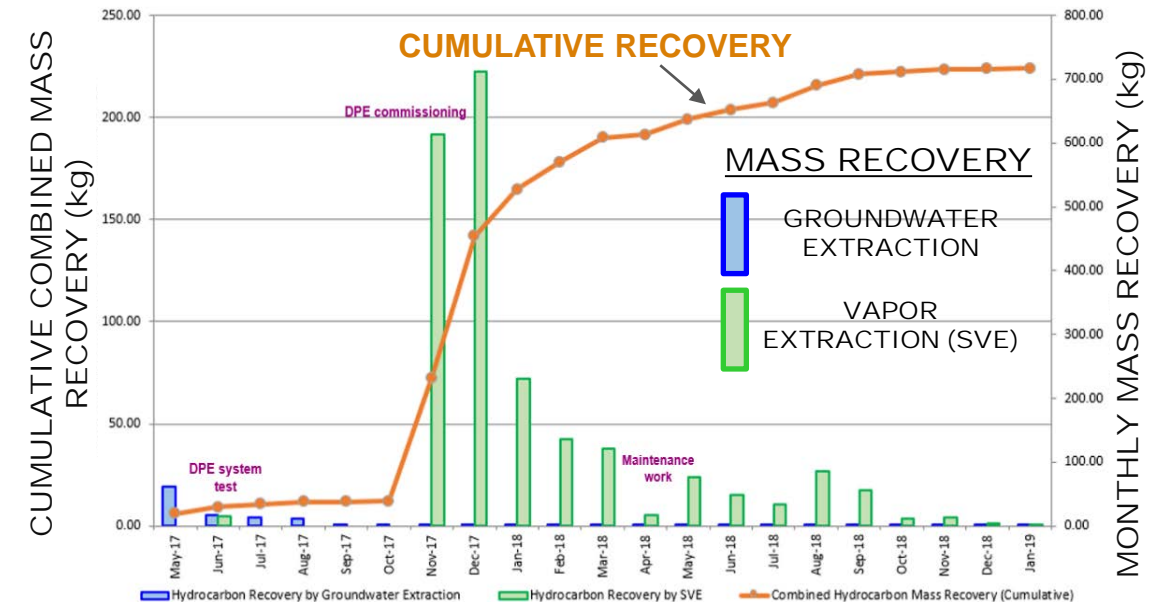
- submerged LNAPL (dewater)
- relatively thick, lower-permeability formations
- confined LNAPL
- lower-volatility LNAPL
- interim remedy (emergency response)



GENERAL OBSERVATIONS

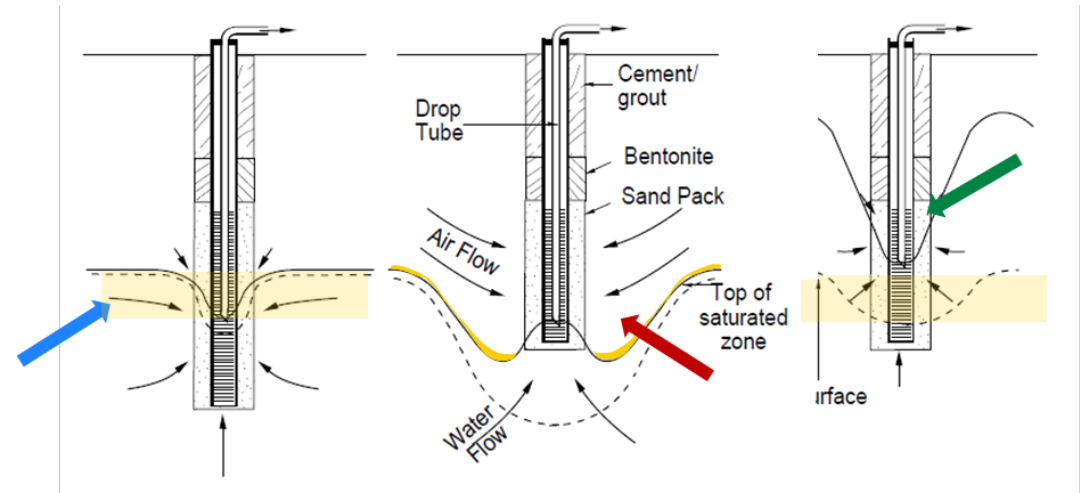
- difficult to operate (stinger/drop tube adjustment)
- relatively costly O&M (instrumentation, uptime, adjustments over time, treatment of multiple fluids, LNAPL/water emulsification in treated liquids w/ single pump configurations)
- most mass loss through vapor extraction - difficult to pull liquids (vs. air w/ SVE) through formations
- liquid removal does not affect risk, only timeline

DUAL PHASE EXTRACTION (DPE) MASS RECOVERY



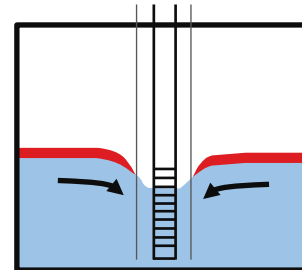
Design Considerations (MPE): What Can Go Wrong?

- inadequate dewatering – too much or too little
- difficulty in optimizing in real-time (permanent installations)
- inability to pull LNAPL through low permeability formations
- LNAPL recovery can easily diminish once water fills pore space adjacent extraction well (water is the wetting fluid vs. LNAPL)
- noise pollution

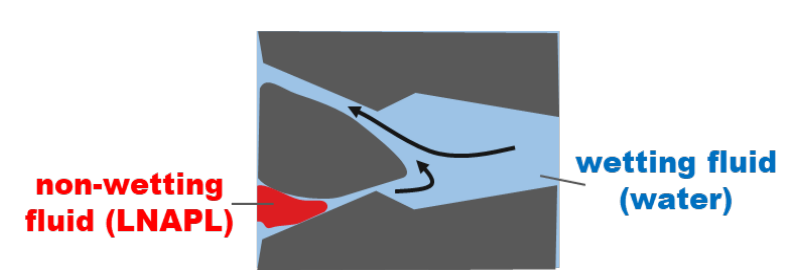


- Permeability too high
- **No drawdown**
- Too much water extracted
- **Good air flow** through exposed, impacted soil
- Permeability too low
- **No expansion of the vadose**
- **No soil gas flow**

MACRO-SCALE



PORE SCALE



LNAPL arteries can easily be “snapped” or by-passed during extraction making LNAPL recovery difficult

BIOVENTING/BIOSPARGING

5.0

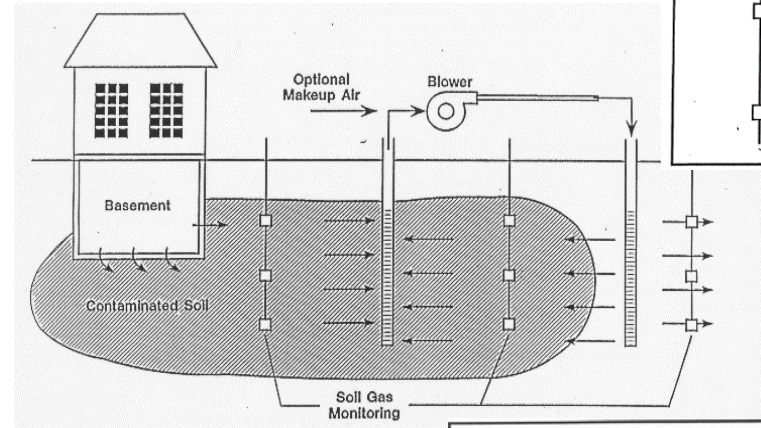
Bioventing/Biosparging

- more sustainable than SVE or AS (O&M, CO₂ footprint – no treatment)
- targets aerobically biodegradable & volatile COCs (e.g., < C₉)
- effectiveness monitoring (other than COCs): pressure, temperature, DO, alkalinity, pH, redox, EC, anions/cations (Fe, S, Mn), soil-gas (O₂, CO₂, CH₄) concentrations
- smaller ROI than AS/SVE (deep sources – ‘ e.g., > 50 ft bgs can be challenging)

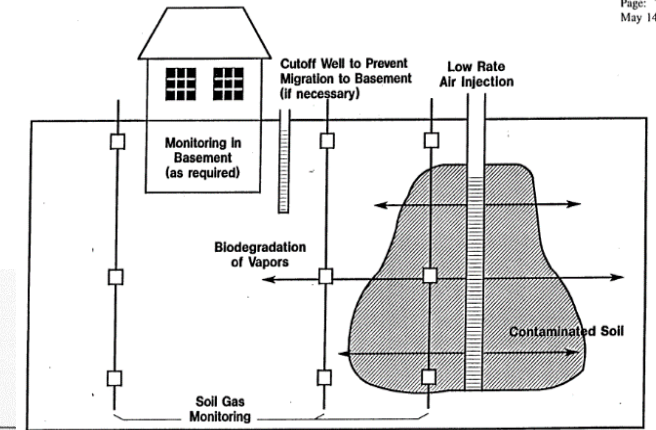
Biosparging

- O₂ as alternative to air @ sites w/ high O₂ demand (LNAPL sources)
- injection wells can be clogged by elevated TPH concentrations (e.g., > 50,000 ppm) from biofouling or high (e.g., > 10 mg/L) dissolved Fe⁺² (precipitation)
- again, pulsing limits channelization (e.g., 1 – 8x/day)

Bioventing - Air Extraction

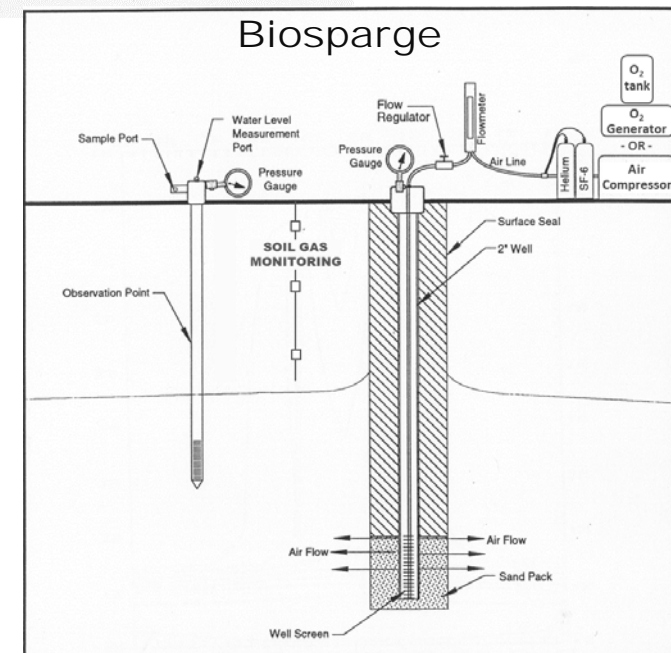


Bioventing - Air Injection



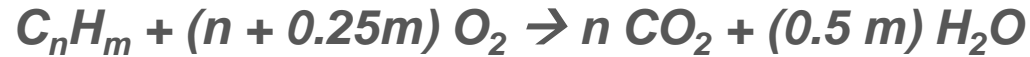
From Hinchee et al. (1992)

Biosparge



Bioventing/SVE: In Situ Respirometry Test

- rates of hydrocarbon (C_nH_m – e.g., benzene C_6H_6) degradation are proportional to rates of O_2 utilization and CO_2 production (assuming conditions in the vadose zone are aerobic)

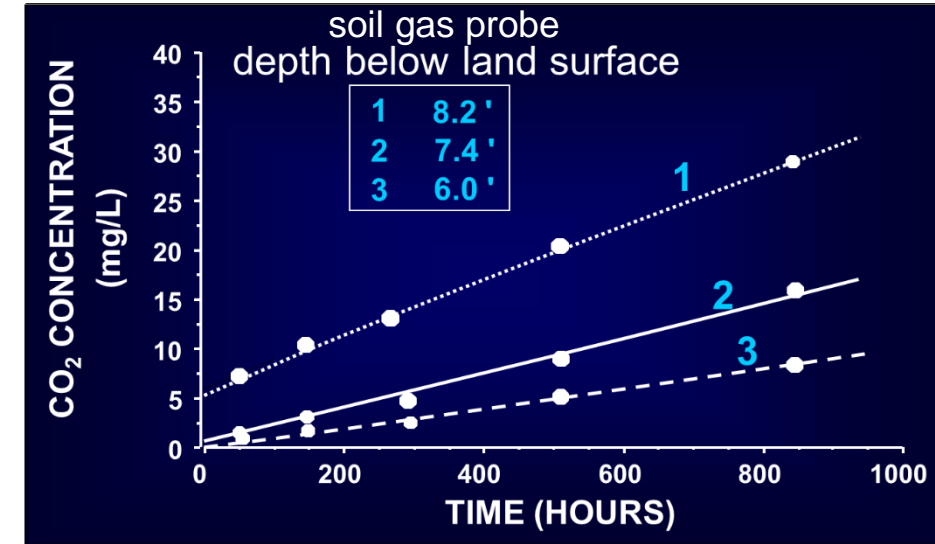


- assess site specific biodegradation rates by
 - measure O_2 , CO_2 before test (test well or soil-gas probes)
 - extract air (bioventing/SVE)
 - shut system off and monitor O_2 , CO_2 rebound (test well or soil-gas probes)
 - evaluate biodegradation rates by fitting a line through the data (slope) or applying a simple analytical solution

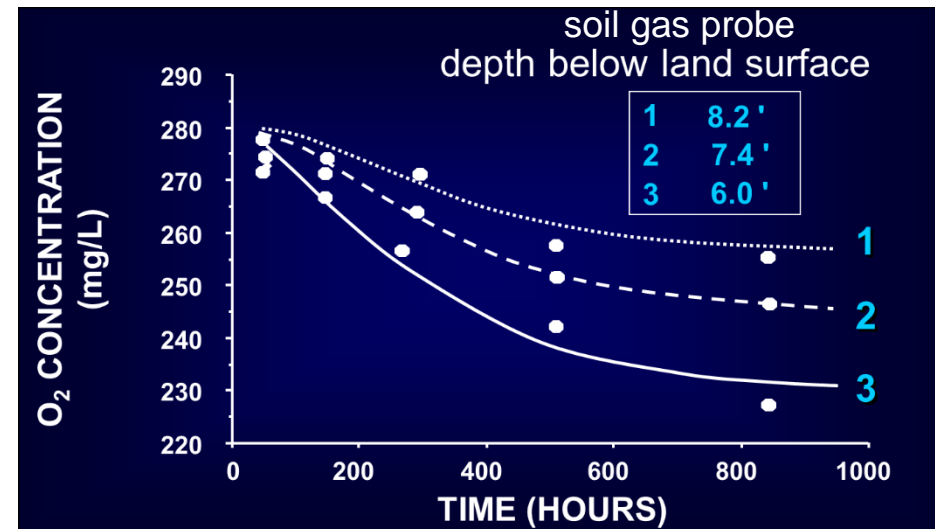


Hinchee and Ong (1992)

CO_2 Rebound Following SVE



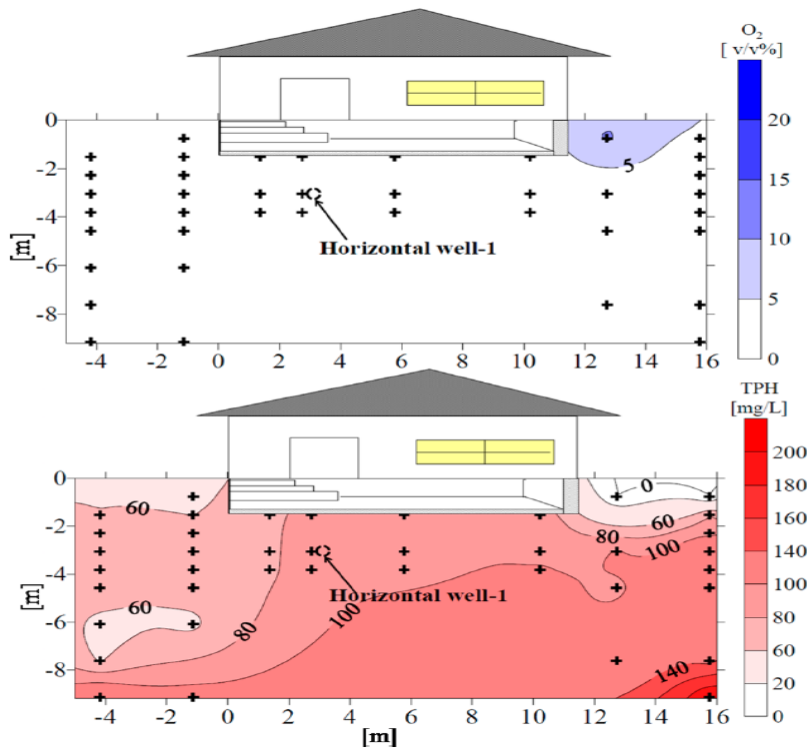
O_2 Rebound Following SVE



Lahvis and Baehr (1996)

Bioventing (Injecting Air): A PVI Mitigation/Remediation Technology

SOIL-GAS DISTRIBUTION

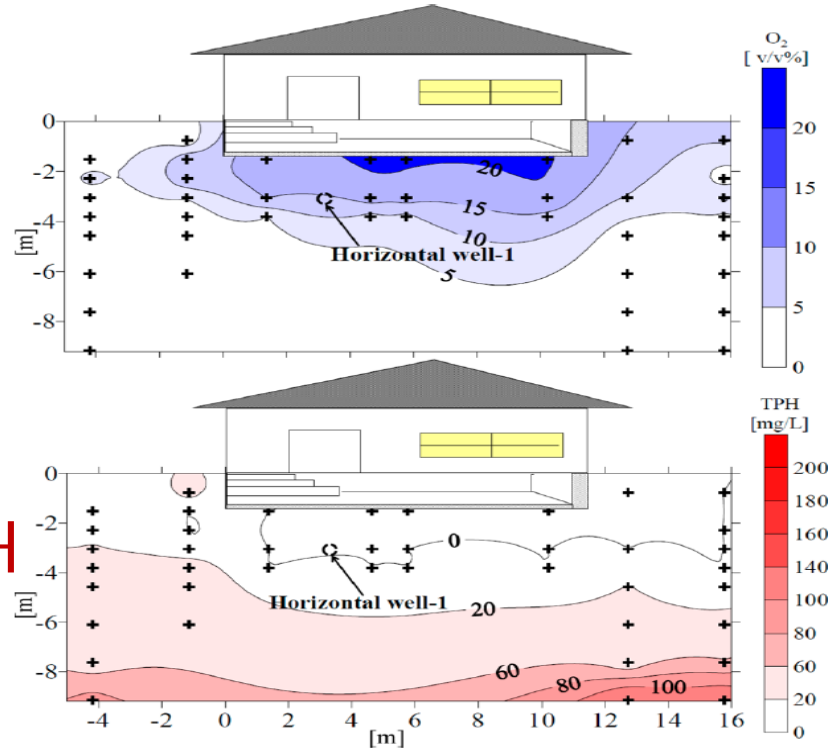


PRE - VENTING

Luo et al. (2013)

O₂

TPH



AFTER 60 DAYS

Aerobic Vapor Migration Barrier (AVMB)

ITRC Technology Information Sheet
Vapor Intrusion Mitigation Team | January 2020

Aerobic Vapor Migration Barrier (AVMB)
Applicability as a method of vapor intrusion mitigation and remediation

This ITRC Technology Information Sheet describes a novel method for vapor intrusion (VI) mitigation involving the delivery of atmospheric aerobic biodegradation barrier preventing hydrocarbon vapor migration from the subsurface to indoor air. The method is relevant for many hydrocarbons of concern for VI that are susceptible to aerobic biodegradation, namely petroleum hydrocarbons. The method can also promote the remediation of shallow subsurface sources. The method is generally a more sustainable, cost effective alternative to other VI mitigation and remediation (e.g., soil remediation and sub-slab depressurization) because mitigation and remediation occurs in-situ (i.e., the technology does not require expensive off-gas treatment). This Technology Information Sheet is intended to provide basic information to assist the practitioner in VI mitigation decision making.

Overview

Aerobic vapor migration barrier (AVMB) is an in-situ VI mitigation and remediation technology that involves the slow and around a building foundation through either sub-slab vents or horizontal wells installed below the building foundation (see Figure 1). The delivery of ambient air creates elevated oxygen (O₂) conditions in the shallow soil around the foundation that are favorable for aerobic biodegradation. Hydrocarbons that are susceptible to aerobic biodegradation (e.g., petroleum hydrocarbons) are biodegraded before entering the building foundation. The technology can remediate shallow vapor sources and thus serve as a dual remediation and mitigation effective alternative to soil vapor extraction (SVE), multi-phase ventilation technologies that can involve expensive off-gas treatment and intrinsically safe equipment for certain (e.g., greater detail in Luo et al. (2013)).

Design Considerations

Conceptually, AVMB involves the injection of ambient air (O₂) below and around a building foundation to create and maintain an aerobic biodegradation barrier that prevents certain reactive (e.g., petroleum) hydrocarbons from migrating to indoor air. The technology is also applicable in mitigating acute VI issues related to methane (i.e., flammability). The aerobic biodegradation of most petroleum hydrocarbons of concern for VI (and methane) has been well documented. Such hydrocarbons generally biodegrade aerobically in the subsurface at rates that exceed rates of

Regulatory Acceptance for New Solutions
Documents, free Internet-based training, contact information: www.itrcweb.org

Figure 1. Conceptualization of an Aerobic Vapor Migration Barrier.

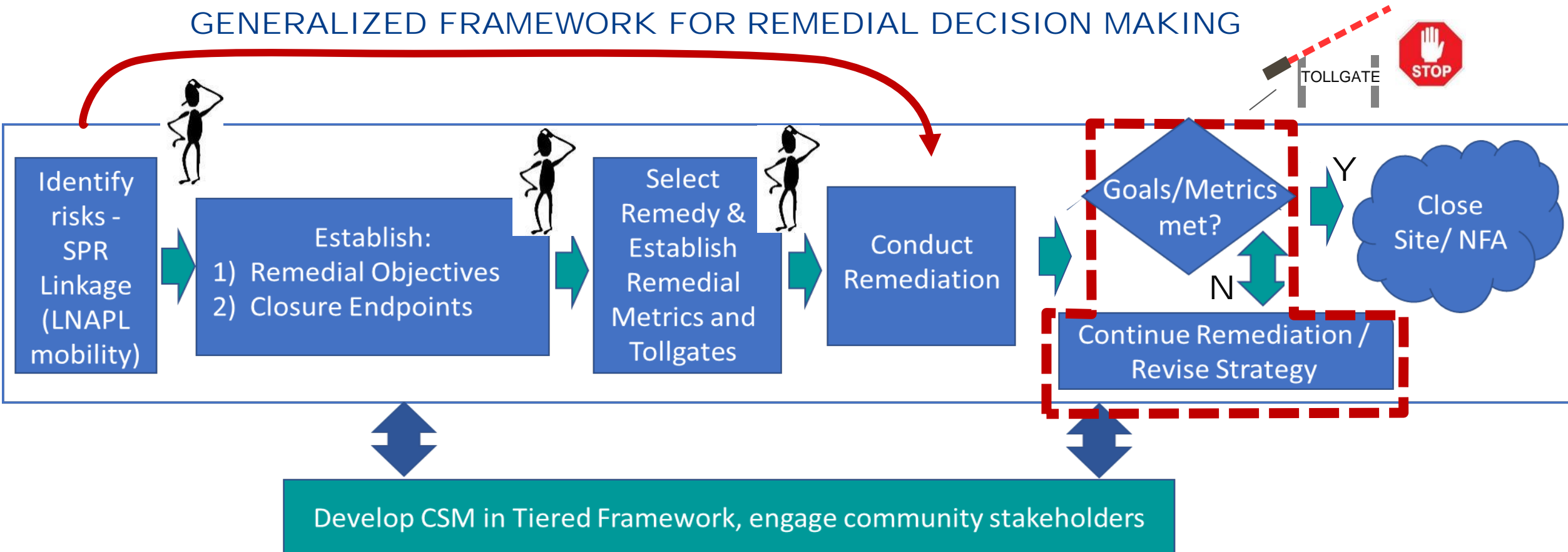
<https://vim-1.itrcweb.org/aerobic-vapor-mitigation-barrier-avmb-tech-sheet/>

“GETTING TO CLOSURE”... MORE
CONFIDENTENTLY, MORE SUSTAINABLY

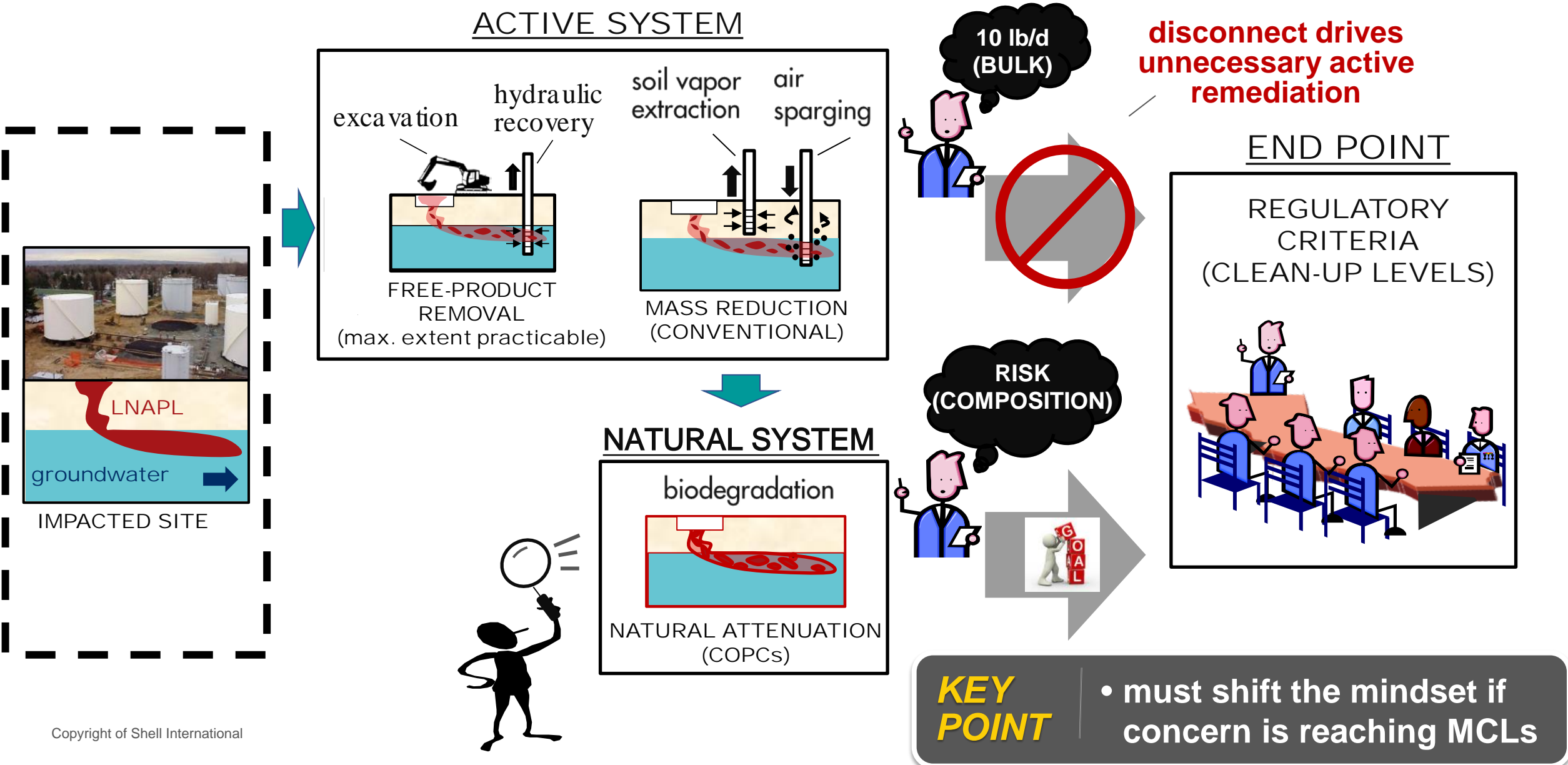
6.0

Case for Change: Improving Remedial Decision Making

GENERALIZED FRAMEWORK FOR REMEDIAL DECISION MAKING

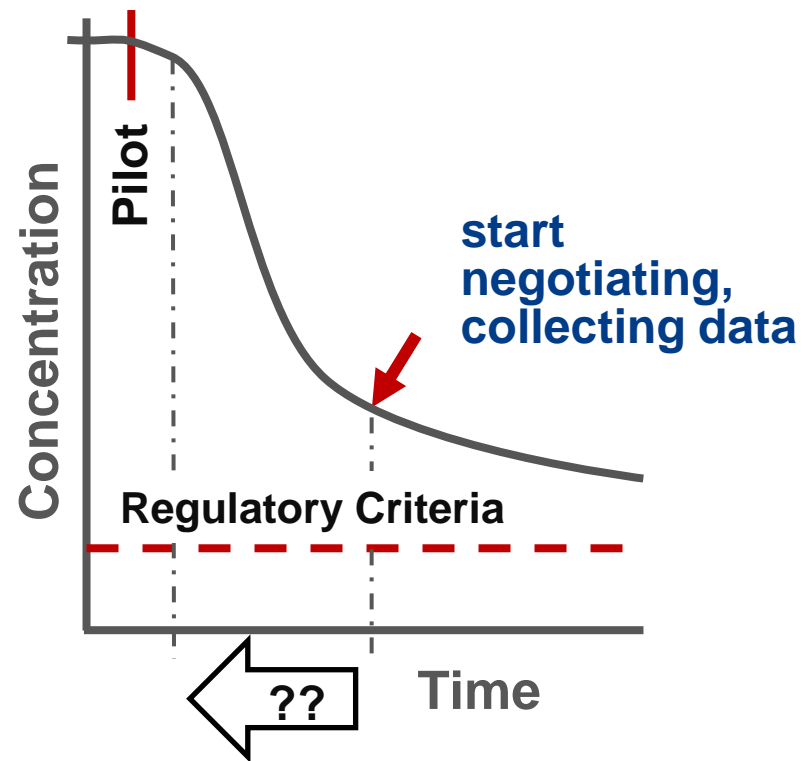


Case for Change: Poorly Defined Remedial Concerns

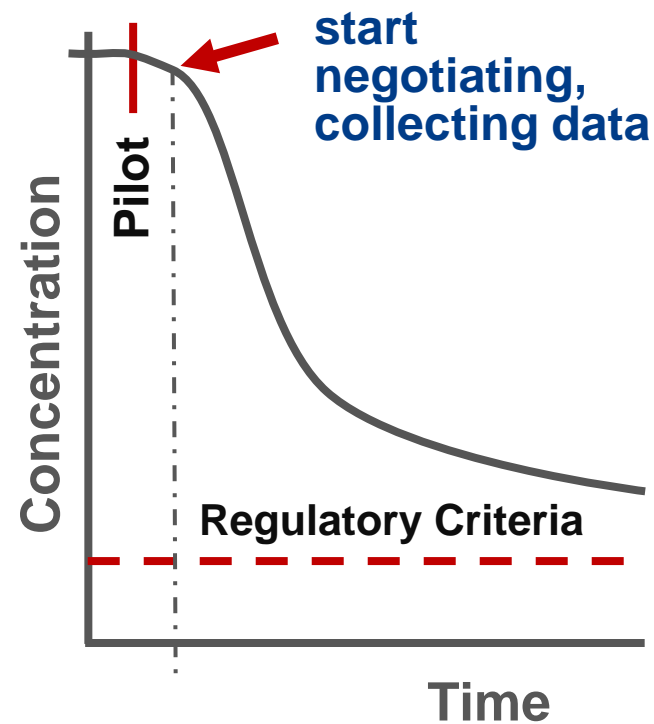


Case for Change: No Alignment Upfront on Key Metrics/Tollgates, Knowing What Data to Collect ... When

EXISTING SITES



NEW (IDEAL) SITES



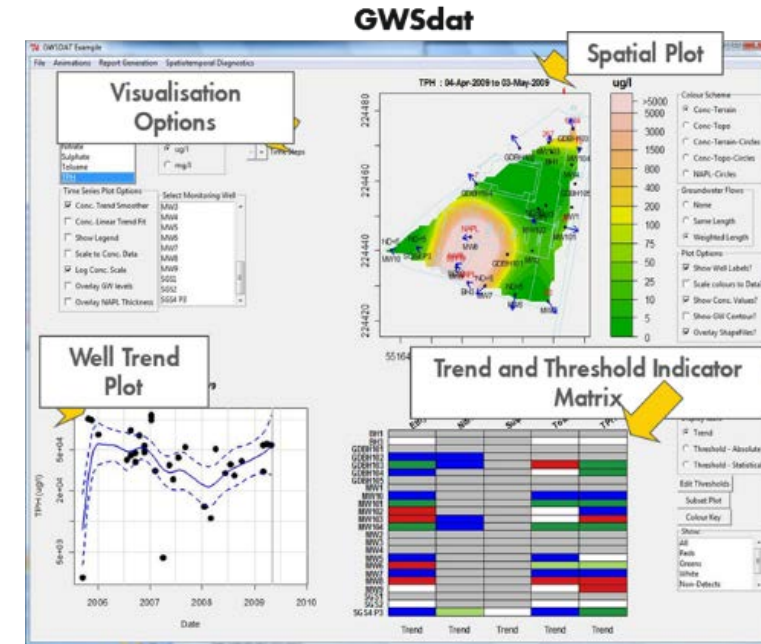
Man... I wish I could have collected that data from the outset



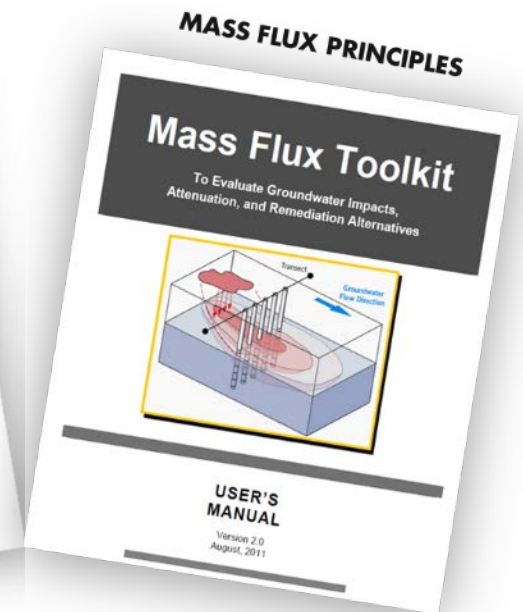
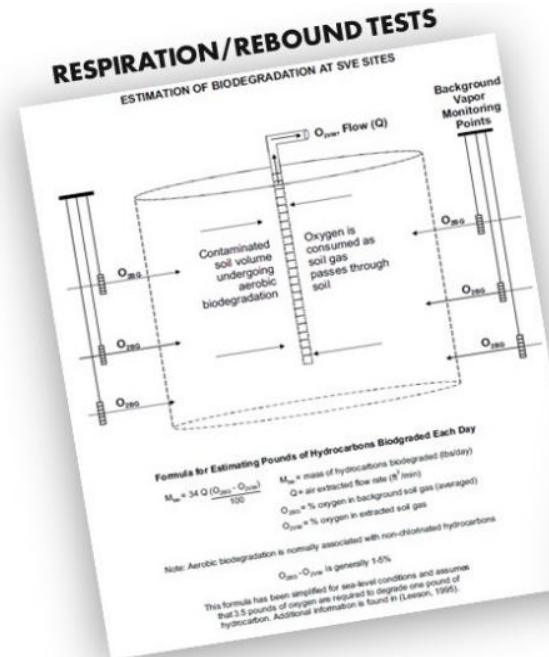
“Exit Strategy” Toolkits: “Getting to Closure” More Efficiently

- **ISSUE:** active remediation poorly optimized or operated beyond beneficial life (risk reduction/sustainability)
 - limited upfront agreement on
 - remedial objectives
 - performance metrics (data collection needs, analyses, metrics, tollgates)
 - transition thresholds
 - missed opportunities to collect key data (no documentation of baseline condition – e.g., natural attenuation rates)
 - limited use of available tools
 - practical guidance is lacking

- **GOAL:**
 - ✓ systematic MLE approach to initiating/ evaluating / terminating active remediation
 - ✓ optimized (less “unnecessary”) active remediation
 - ✓ more confident remedial decision making
 - ✓ more successful stakeholder communication



GWSdat - <http://gwsdat.net/home/>



“Exit Strategy” Toolkits: Getting to “Closure” More Efficiently

Technology Specific Factsheets:

- Compendium (general framework)
- SVE
- Bioventing
- LNAPL Hydraulic Recovery
- Natural Attenuation / Natural Source Zone Depletion (NSZD)

Format:

- generally short (4 – 8 pages)
- illustrative (plots, tables, figures)
- links to further information
- highlight data collection/analyses (not a checklist)
- post CSM (remedial decision making)

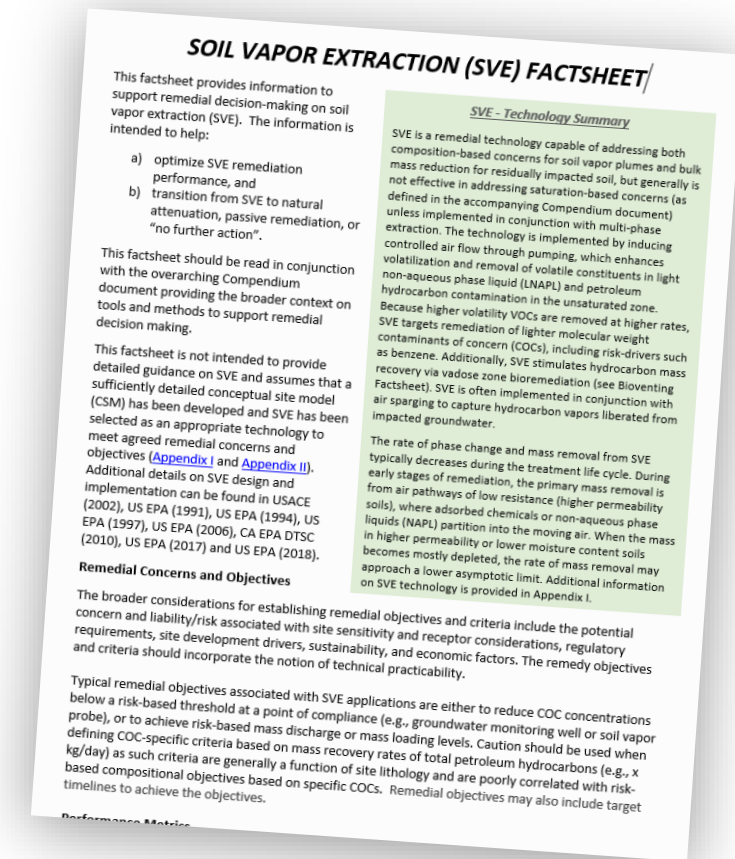
What’s Different (Key Elements):

- baseline natural attenuation rate / NSZD assessment
- performance metrics
- transition thresholds
- validation criteria
- multiple lines of evidence (MLE)
- sustainability focused (technical, economic, social)

HERS Environmental Consulting, Inc.

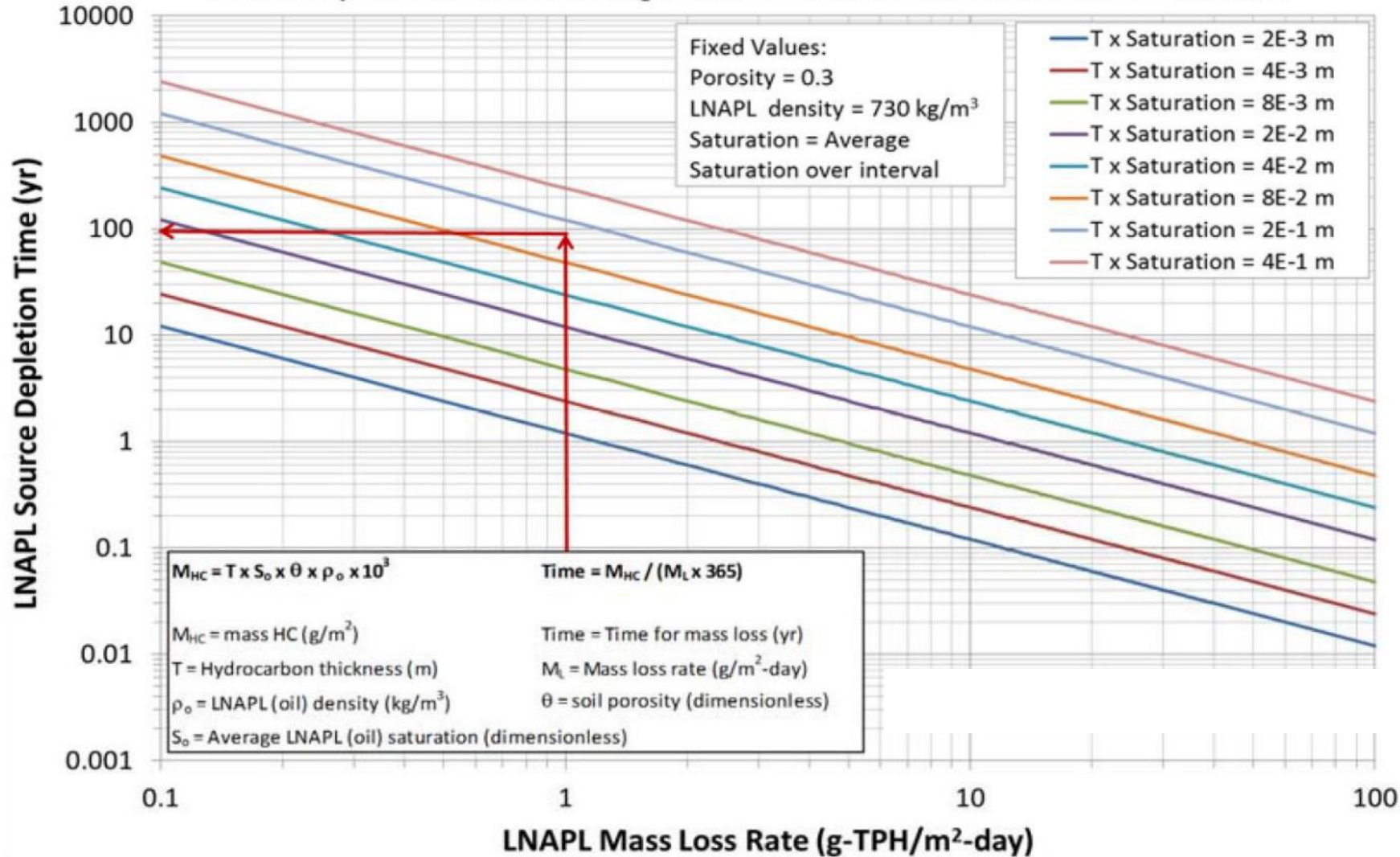
ARIS

Shell



Baseline Assessment: NSZD Measurements – Predicting Time for Source Depletion

Source Depletion Time from Biodegradation in Vadose Zone Based on LNAPL Saturation



- requires initial mass/concentration estimate and extrapolation of measured attenuation rates (challenging)
- can predict using a model
- current options for dissolved phase:
 - Source DK¹
 - US EPA RemFUEL²
 - uncertainty in source discharge model and source zone biodegradation
 - likely underpredicts attenuation when significant anaerobic biodegradation is occurring

order of magnitude estimates

¹ <https://www.gsienv.com/product/natural-attenuation-tool/>

² <https://www.epa.gov/water-research/remediation-evaluation-model-fuel-hydrocarbons-remfuel>

Performance Metrics (SVE): Saturation-Based Concern (Subsurface Metrics)

Table 2. Performance Metrics for Saturation-Based Concern

Metric	Methods	Relative Cost	References/Tools
SUBSURFACE METRICS			
LNAPL transmissivity	Bail-down or skimming test Oil-water ratio Other methods	Low to moderate	ITRC LNAPL Guidance (2018) ASTM E2856-13 API Transmissivity Guide
LNAPL footprint (presence/absence in wells)	Time-series measurements in perimeter wells	Low	ITRC LNAPL Guidance (2018)
LNAPL thickness in wells	Time-series measurements in LNAPL body wells	Low	ITRC LNAPL Guidance (2018)
Mobile LNAPL	Compare actual to residual LNAPL saturation; estimated from vertical equilibrium (VEQ) model or lab measurements)	Moderate to high	API LDRM ITRC LNAPL Guidance
LNAPL saturation profile	Estimate from saturation in soil samples or estimate from TPH and/or Estimated from VEQ model during or after system operation	Moderate to high	ITRC LNAPL Guidance (2018)
LNAPL velocity	Estimate from transmissivity or VEQ model	Moderate to high	API Interactive Guide API LDRM
NSZD rate (bulk)	Unsaturated zone biodegradation rate (CO ₂ efflux, soil gas gradient, temperature methods)	Low to high	Natural Attenuation – Overview and related Factsheets
LNAPL movement in sediment (aquatic environment)	Metrics for advective NAPL movement: measurements to assess pore scale mobility; and/or evaluate migration	Low to high	ASTM E3282 Reyenga (2021)
Subsurface rebound test	Turn system off temporarily and monitor response (e.g., LNAPL thickness in wells, transmissivity)	Moderate to high	See Compendium Factsheets ITRC LNAPL Guidance CRC Care 2015
Geochemical parameters (e.g. O ₂ , CH ₄) indicative of natural attenuation	Soil gas and/or groundwater sampling and analysis	Low to moderate	Remediation Toolkits ² ITRC LNAPL Guidance (2018)

Transition Thresholds: Examples

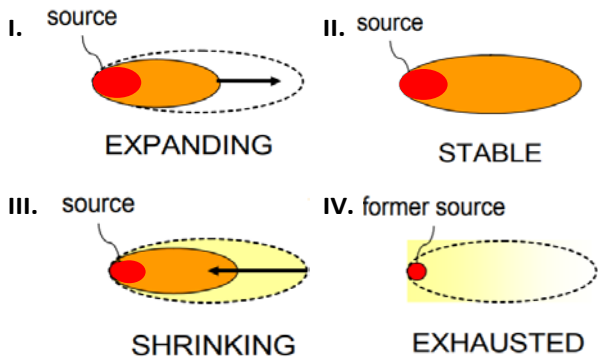
KEY

S = Saturation-based
C = Composition-based

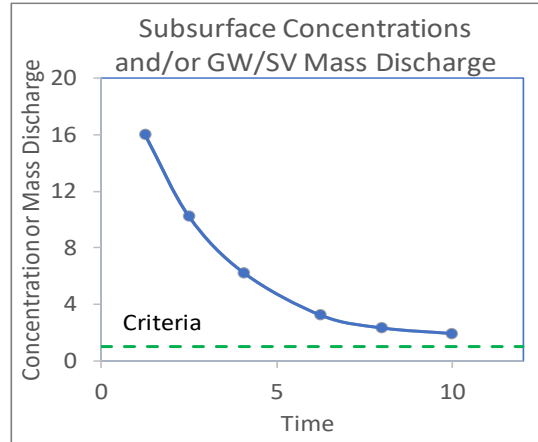
- ✓ recovery of 95% of LNAPL based on decline curve analysis (S)
- ✓ LNAPL transmissivity below ITRC (2018) threshold of 0.1 to 0.8 ft²/day (S)
- ✓ concentrations or mass discharge at or approaching criteria within accepted statistical certainty (C)
- ✓ active mass recovery rates similar to or less than NSZD or natural attenuation rates (S) (C)
- ✓ ratio of GHG emissions per unit reduction in mass or concentration is rapidly increasing (S) (C)
- ✓ ratio of costs per unit reduction in mass or concentration is rapidly increasing (S) (C)

multiple lines of evidence are used to increase confidence in transition to alternative remediation or monitored natural attenuation

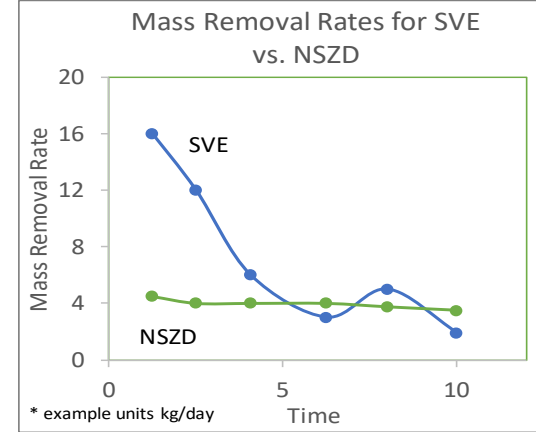
Transition Thresholds: Examples



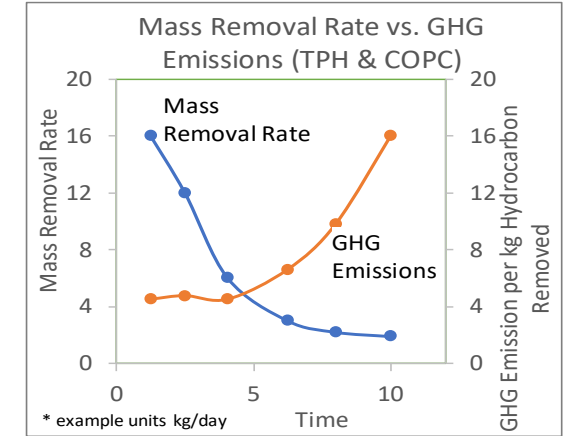
T1. Groundwater Plume is Stable or Shrinking (see Toolkit 2)



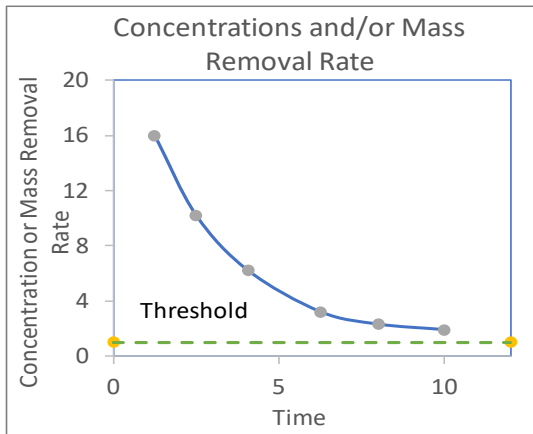
T2. Concentration/Mass Flux Approaching Asymptote or Criteria (see Toolkit 2)



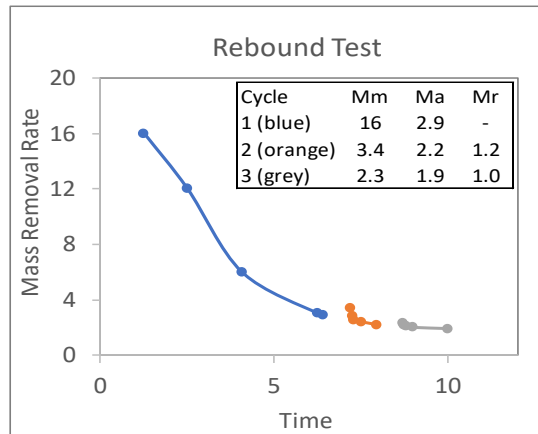
T5. Active Mass Removal Rate Approaching or is Less than NSZD Rate (see this Compendium)



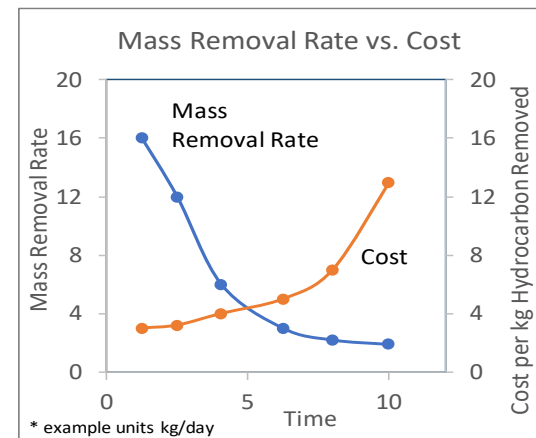
T6. Normalized GHG Emissions (or other metric) Increasing with Little Benefit from Continued Operation (see Toolkit 4)



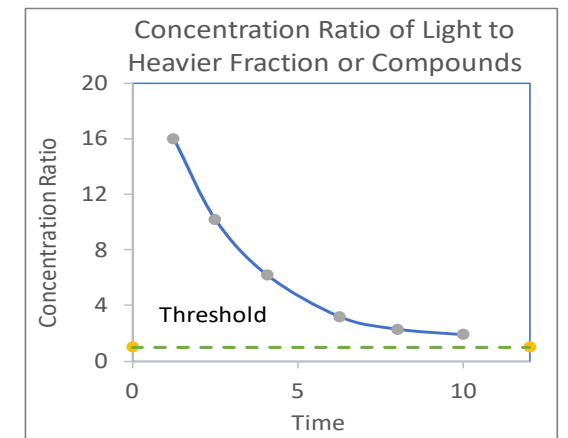
T3. Extracted Soil Gas Concentration/ Mass Removal Rate Approaching Asymptote or Risk-based Threshold (see Toolkit 2)



T4. Acceptable Mass Discharge and Mass Removal Rate (see this Compendium - Appendix III)

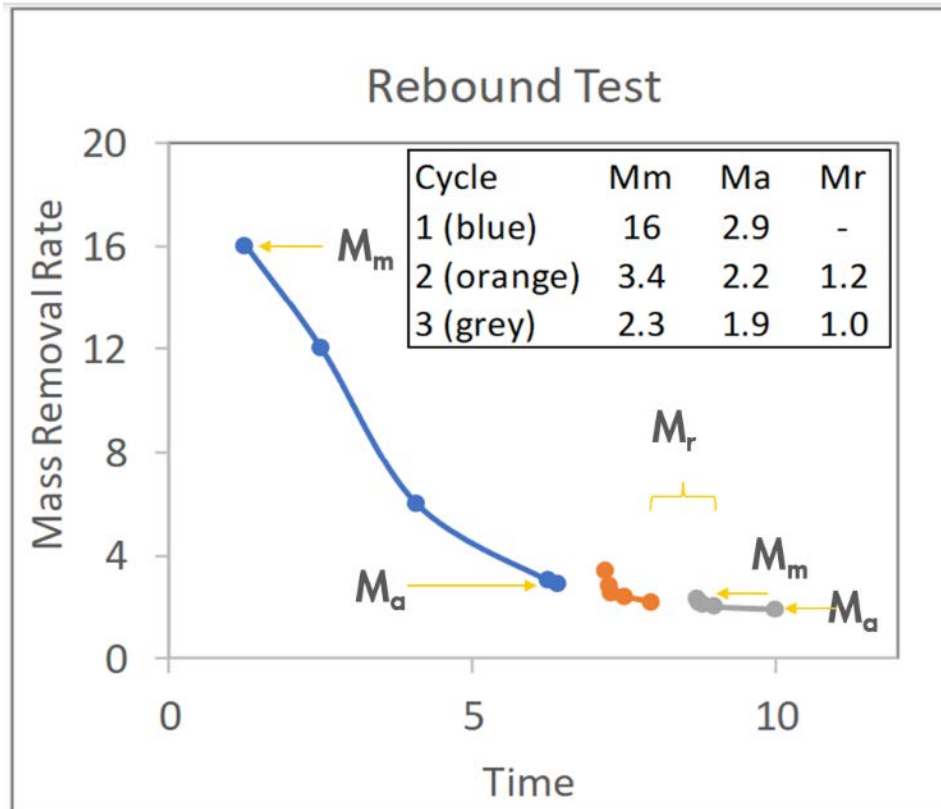


T7. Normalized Cost Increasing with Little Benefit from Continued Operation (see Toolkit 4)



T8. Concentration Ratio Approaching Asymptote or Risk-based Threshold (this Compendium)

Validation: Rebound Testing



Simple models (Brusseau et al. 2010; Truex et al. 2013)

- 1st pore volume of mass that is removed after system restart:

$$M_{pv} = \sum_{i=1}^n (C_i - C_a) Q_i \Delta T_i$$

M_{pv} = mass removed 1st pore volume after start up; C_i = conc. system turned on;
 C_a = conc. at end of previous cycle; ΔT_i = time 1 pore volume; T = rebound period

- average mass during rebound (M_r) often occurs from low permeability zones: $M_{rF} = \frac{M_{pv}}{T}$, where T = rebound period
- convergence in rebound flux M_r (diffusive) with active flux M_a suggests approaching end of operational life

More complex models:

- “SVEET” quantifies mass discharge and impact of remaining vadose zone contaminant sources on groundwater
https://bioprocess.pnnl.gov/SVEET_Request.htm
- “VIETUS” quantifies mass discharge on soil vapour intrusion into building
https://bioprocess.pnnl.gov/VIETUS_Request.htm

Key Take Aways

- air-based remediation (SVE, MPE, AS) preferred for petroleum hydrocarbon remediation (risk reduction/attenuation rate standpoint)
- biosparging/bioventing are generally underutilized – potential sustainable alternatives to end-of-life, underperforming engineered systems (SVE, AS, MPE)
- we can do better w/ respect to operating air-phase (or any) remediation systems more sustainably & improving remedial decision making
 - aligning on remedial concerns and goals
 - aligning on baseline, performance, transition, and validation metrics (and associated data needs, tollgates)
 - incorporating the natural assimilative capacity into remedial paradigm
 - taking advantage of the myriad of tools available



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Questions and Answers

Q&A



THANK YOU, SPEAKERS!



Edward Tung | *M.K. Environmental, Inc.*

Matthew Lahvis | *Shell Global Solutions (US) Inc.*

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Thank you for your participation!