## **Planning** Treatment Trains and Concurrent Remedies



#### Failing to plan is...planning to waste a lot of \_\_\_\_\_ (fill in the blank).



Tom Fox, Colorado OPS



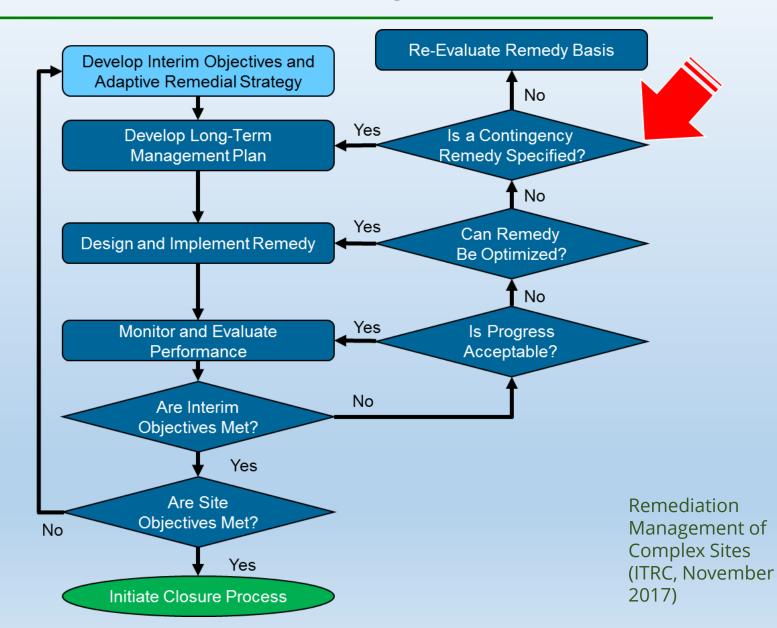
## "CAP to Closure"

- Does your state require one?
- What does this mean?
- Do you usually reach NFA in one try?
- Is the CAP ever updated?
  - How are modifications made?
  - How are costs reconciled?
- How do you judge remedial progress?





## Adaptive Site Management



## 21 Technology "Tools"

- 1. Excavation
- 2. Skimming
- 3. Vacuum enhanced skimming (LNAPL & vapor)
- 4. Total liquid extraction (LNAPL & water)
- 5. Multi-phase extraction (LNAPL, water, & vapor)
- 6. Water/hot water flooding
- 7. Surfactant-enhanced subsurface remediation
- 8. Cosolvent flushing
- 9. Steam injection
- 10. Electrical resistance heating

- 11. Air sparging / soil vapor extraction (AS/SVE)
- 12. In-situ chemical oxidation
- 13. Natural source zone depletion (NSZD)
- 14. Physical or hydraulic containment
- 15. In-situ soil mixing (stabilization)
- 16. Thermal conduction heating
- 17. In-situ smoldering
- 18. Biosparging / bioventing
- 19. Enhanced anaerobic biodegradation
- 20. Activated carbon
- 21. Phytotechnology

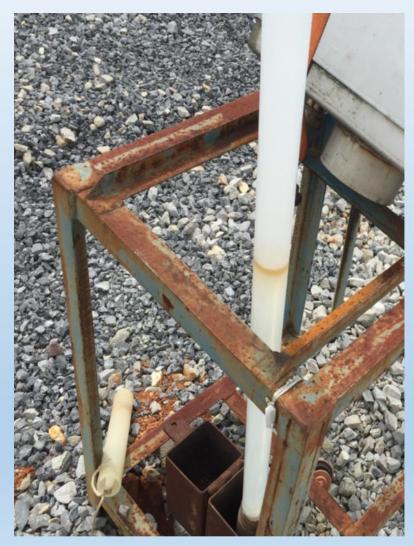
LNAPL Site Management: LCSM Evolution, Decision Process, and Remedial Technologies (ITRC, March 2018)

## Not Included in Technology Tables

- 1) Manual Bailing
- 2) Periodic or Short-term Vacuum Truck Events
- 3) Passive Skimmers
- 4) Absorbent Socks

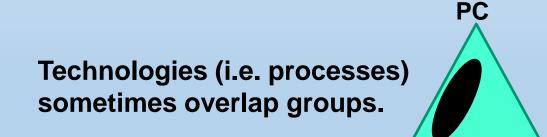
#### WHY NOT?

The mass recoverable is insignificant compared to the whole (*but it may be required by regulation*)



#### **LNAPL Remedial Technology Groups**

- Mass Control Contain LNAPL at a defined boundary
- Mass Recovery Remove LNAPL mass to limit migration
- Phase Change Abate unacceptable COCs

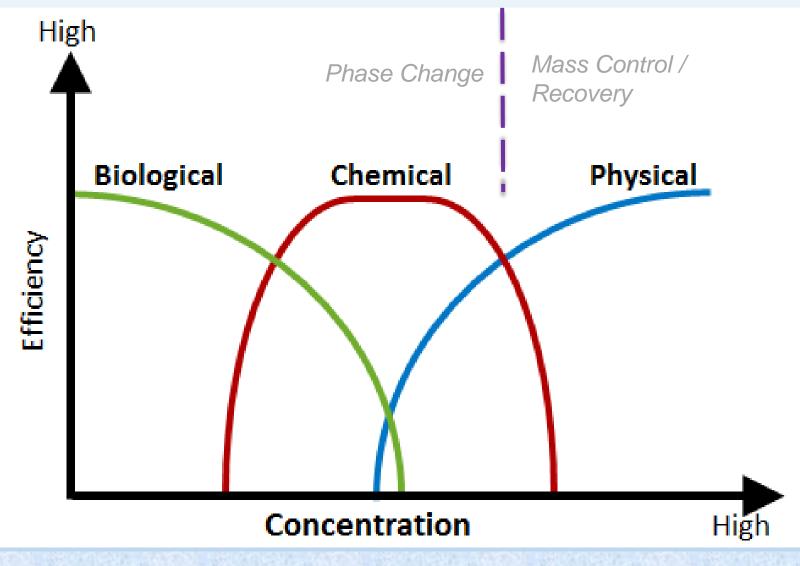


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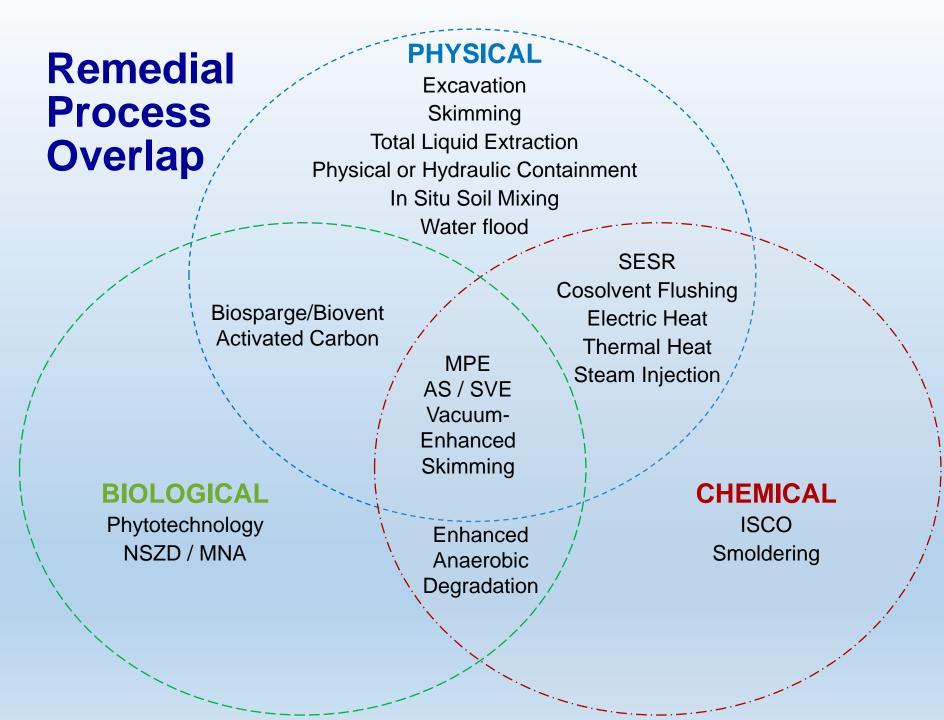
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LNAPL Site Management: LCSM Evolution, Decision Process, and Remedial Technologies (ITRC, March 2018)

### Processes







# **Technically Achievable**

#### **Examples Include:**

#### **Remedial Mechanism**

1. LNAPL Recoverability



- 2. Volatilization
  - AS
  - SVE
- 3. Injection
  - ISCO
  - Carbon
- 4. Biodegradation
  - Biovent / Biosparge
  - NSZD/MNA

Soil texture limits delivery of oxidant / other media



Rate of degradation won't achieve goal in timeframe

Vapor Pressure (>  $\sim$ 1 kPa at 15° C)

PID emissions stable (<xxx ppm)





**Technically Achievable Limit** 

LNAPL Transmissivity (0.1 to 0.8 ft<sup>2</sup>/day)



## "Treatment Train" (Consecutive Remedies)

- <u>PLANNING</u> to use multiple remedial technologies *in sequence* to achieve closure
- Sequence remedial technologies based on contaminant concerns and remedial objectives
  - 1. Start with a primary technology (excavation?) tailored for higher contaminant mass
  - 2. Continue with a 2nd treatment technology (ISCO?) and possibly a 3rd polishing step (CBI?) for remaining contaminant mass





## **Treatment Trains**

#### Bad

- Unplanned, lack SMART objectives, no or poor metrics for transition, milestones and endpoints uncertain
- "Throwing" more technologies at the problem

#### Good

- When planned with SMART objectives; metrics for transition, milestones and endpoints defined
- Orderly implementation



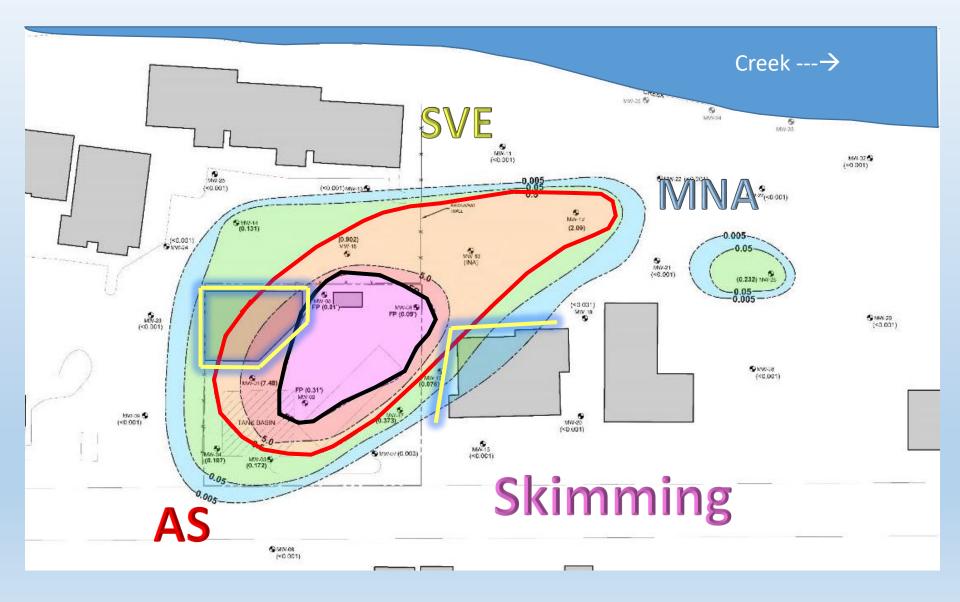
## **Concurrent Remedies**

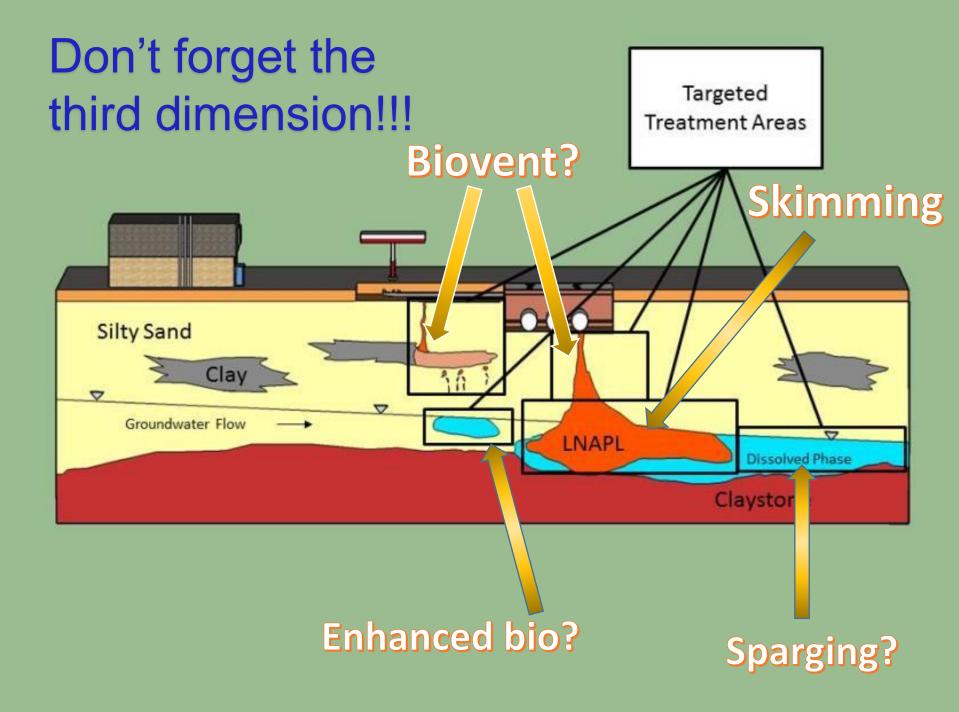
- Using multiple technologies on a site at the same time, in *different target zones* due to differing contaminant concentrations
  - Use primary technologies in the source area (e.g. excavation).
  - Use secondary or tertiary technologies on periphery of contaminated area, and in deeper zones.
- Still rely on SMART performance metrics to measure remedial progress





### **Example: Treatment Areas**

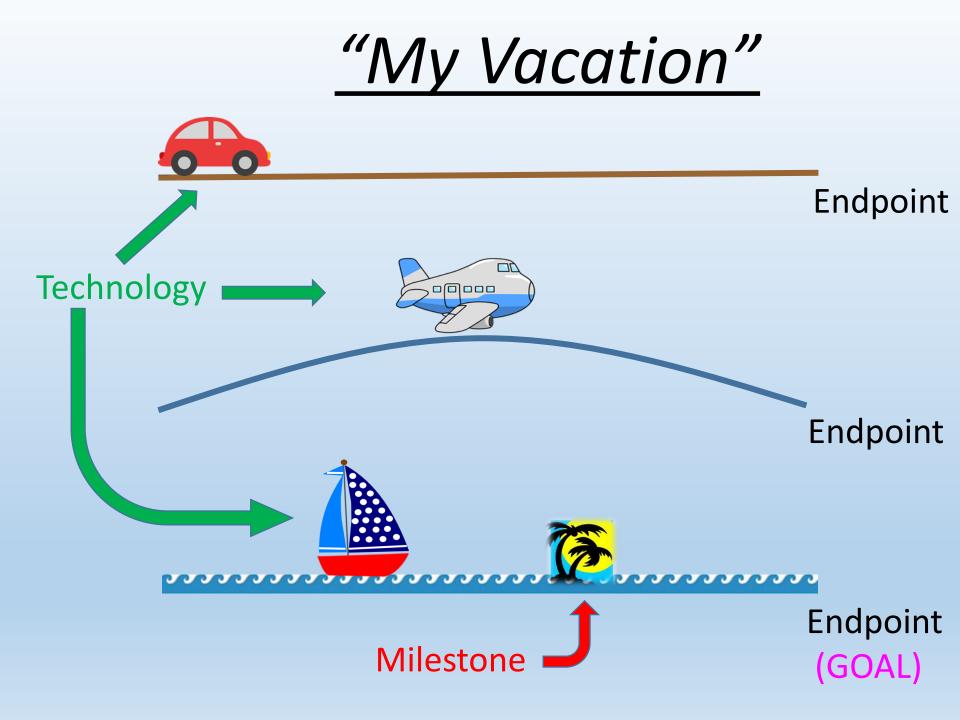












## GETTING SMART

- Specific Targeted treatment area and technologyspecific endpoints are clearly stated
- Measurable Performance metrics that demonstrate progress towards the endpoint
- Agreed Upon Concerns, goals, objectives, treatment areas, metrics, endpoints
- Realistic Demonstrated ability to achieve objective
- Time-Based Target date of remedial endpoint being achieved

### **Performance Metrics**

<u>Measurable characteristics</u> that track the progress of a <u>selected technology</u> to achieve a remedial objective and abate a contaminant concern

<u>ASK</u>: What conditions do you expect to change as you remediate the site? And how quickly?





## **Performance Metrics**

Technology-specific!

- N.
- Track progress toward endpoint
- Verify that remedy is being implemented effectively
- Allow for mid-course corrections
- Allow for CSM updates





### Performance Metrics Examples (What you can measure)

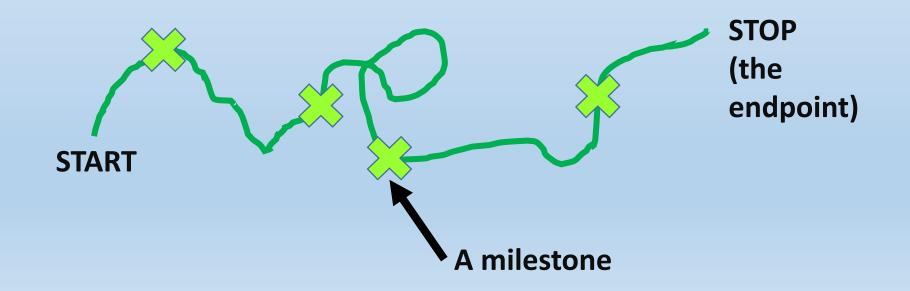
- AS/SVE Concentrations in emission samples (e.g. PID, benzene, CO<sub>2</sub>, CH<sub>4</sub>)
- ISCO Data to evaluate distribution of an in-situ application (e.g. pH, ORP, DO, SO<sub>4</sub><sup>-2</sup>)
- SVE Interim or final soil confirmation samples
- MNA Organic/ inorganic/ biological samples





### Remedial Milestones (Interim Objectives)

Points to evaluate progress towards a remediation technology endpoint (a schedule)



## **Remedial Milestone Examples**

- LNAPL reduction = 10% of volume estimate per quarter / per month
- Emissions decrease 25% per quarter / per month
- Dissolved phase concentrations remediated to 25%, 50%, 75% of endpoint (with timeframe)



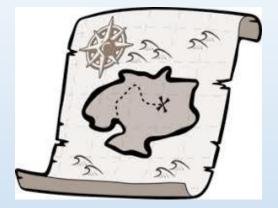
Declines are exponential, not linear (90% of the result takes 10% of the time?)





### **Endpoints**

- Also technology-specific!
- Defined as:



- 1. LNAPL concern has been addressed, or
- 2. Practicable limit of the technology reached

The <u>technology</u>'s endpoint may not be your site goal!