

Nevada Division of Environmental Protection

Bureau of Corrective Actions CEM Workshop for
Remediation and Leaking Underground Storage Tank
Cases

April 22 and 24, 2025

Presented by

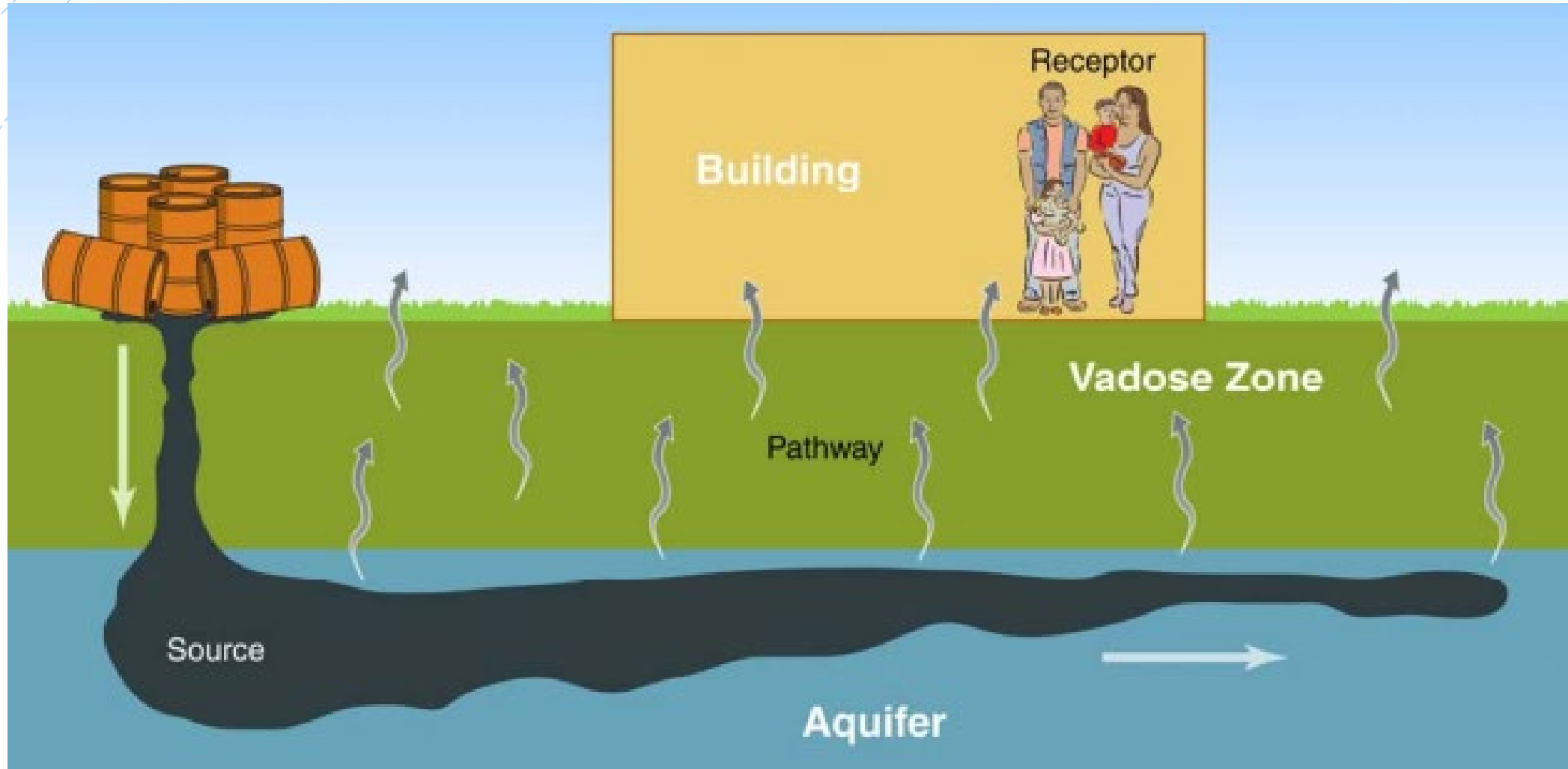
**The NDEP Bureau of Corrective
Actions**



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**



Vapor Intrusion 101



Vapor Intrusion 101

Resources

- <https://www.epa.gov/vaporintrusion>
- <https://www.epa.gov/vaporintrusion/vapor-intrusion-screening-level-calculator>
- <https://www.epa.gov/vaporintrusion/epa-spreadsheet-modeling-subsurface-vapor-intrusion>
- <https://www.api.org/oil-and-natural-gas/environment/clean-water/ground-water/vapor-intrusion/biovapor>
- <https://itrcweb.org/>
 - Under “Guidance Materials” choose “Search by Topic” and Vapor Intrusion from the drop-down menu. ITRC will be combining and updating VI guidance for release early 2026.

Vapor Intrusion

NDEP

- BCA does not regulate indoor air but can consider VI potential as a line of evidence when evaluating closure requests, can require mitigation be offered when air SSLs are exceeded, and can consider VI potential for setting cleanup goals.
- NDEP does not have action levels or reportable concentrations for soil vapor.
 - Verify results with soil and/or groundwater samples
- NDEP has not published official VI guidance but plans to do so in the next year.

Vapor Intrusion

Ultimate Goal: Prevent Indoor Air SSL Exceedances

	Resident Air ($\mu\text{g}/\text{m}^3$)	Industrial Air ($\mu\text{g}/\text{m}^3$)
Benzene	0.36	16
PCE	11	47
TCE	0.48	3.0

From the EPA RSL Tables as of April 2025

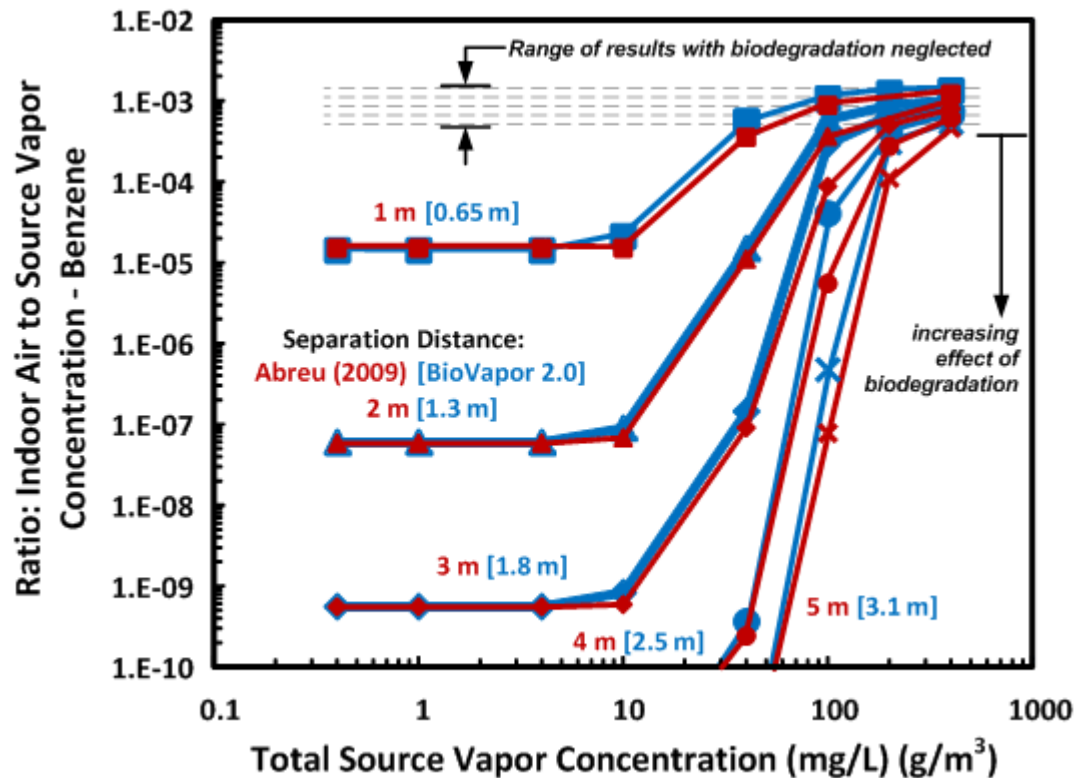
Vapor Intrusion

Methods to estimate indoor air concentrations or screen out sites

- Some states use screening distances:
 - Vertical
 - Typically 15 feet for LNAPL
 - 5 feet for dissolved phase petroleum products
 - 100 feet for chlorinated solvents
 - Horizontal
 - 30 feet is standard for many states
- Default attenuation factor
 - Often 0.003 – 0.01, based on sub-slab soil vapor concentrations
- NDEP does not use default attenuation factors or screening distances, but may consider using the above vertical distances for petroleum releases
- Modeling: VISL, Johnson & Ettinger, BioVapor

Vapor Intrusion

Petroleum VI vs chlorinated VI



BioVapor modeling indicates that at a depth of 1.8 meters (5.9 feet), an attenuation factor of $1\text{E}-09$ is appropriate for benzene concentrations $<10\text{ mg/L}$ ($10,000,000\text{ }\mu\text{g/m}^3$)

This scenario would result in an indoor air concentration of $0.01\text{ }\mu\text{g/m}^3$, well below the Residential SSL of $0.36\text{ }\mu\text{g/m}^3$.

Vapor Intrusion

Petroleum VI



NDEP does not require VI assessment for most PVI cases because:

- Most gas stations have plumes contained onsite and the exposure from nozzles is much higher than through pavement and foundations
- Most offsite dissolved phase plumes are deeper than 5 feet below ground surface
- May need to consider PVI if depth to water is <5 feet for dissolved phase or <15 feet for LNAPL

Vapor Intrusion

Chlorinated VI

- NDEP does not use default vertical screening distances for CVI
- Prefers use of Johnson & Ettinger Model or a similar risk assessment
- Existing guidance is for internal case officer use but is dated due to updated indoor air SSLs. Also is based on a higher risk of 1×10^{-4}

Groundwater Temperature = 15 degrees C

*PCE	Depth to Groundwater (ft bgs)								Units
Soil Texture	5	10	15	20	25	30	40	50	
Sand	70	85	100	115	130	145	180	210	µg/L
Loamy sand	180	200	220	240	250	270	310	340	µg/L
Sandy loam	500	520	550	570	600	620	690	720	µg/L
Loam	780	820	860	900	930	970	1,050	1,130	µg/L
TCE	Depth to Groundwater (ft bgs)								Units
Soil Texture	5	10	15	20	25	30	40	50	
Sand	8	9	11	12	14	16	19	22	µg/L
Loamy sand	19	21	23	25	27	29	32	36	µg/L
Sandy loam	52	54	57	59	62	64	69	75	µg/L
Loam	80	84	88	92	96	101	109	117	µg/L

Vapor Intrusion

Using the Johnson & Ettinger Model

[RESET TO D](#)

Model Input

Site Name/Run Number: Example, Run 1

Note:
 - Yellow highlighted cells indicate parameters that typically are changed or must be inputted by the user.
 - Dotted outline cells indicate default values that may be changed with justification.
 - Toxicity values are taken from Regional Screening Level tables. These tables are updated semi-annually and may not reflect the most current toxicity information.

[Use English / Metric Converter](#)

Source Characteristics:	Units	Symbol	Value	Default	Potential Span	CV
Source medium		Source	Groundwater			
Groundwater concentration	(ug/L)	Cmedium	Groundwater		NA	
Depth below grade to water table	(m)	Ls	Exterior Soil Gas		Vary - 50	NA
Average groundwater temperature	(°C)	Ts	Sub-slab Soil Gas	25	3 - 25	
Calc: Source vapor concentration	(ug/m3)	Cs	361919			
Calc: % of pure component saturated vapor concentration	(%)	%Sat	0.219%			

Chemical: R	Units	Symbol	Value	Default	Potential Span	CV
Chemical Name		Chem	Tetrachloroethylene			
CAS No.		CAS	127-18-4			
Toxicity Factors						
Unit risk factor	(ug/m ³) ⁻¹	IUR	2.60E-07	2.60E-07	NA	NA
Mutagenic compound		Mut	No	NA	NA	NA
Reference concentration	(mg/m ³)	RfC	4.00E-02	4.00E-02	NA	NA

The model can be run using groundwater, exterior soil gas, or sub-slab soil gas data.

Using groundwater data is common because many sites have years of quarterly groundwater data.

Select chemical and the toxicity values will load automatically

Vapor Intrusion

Using the Johnson & Ettinger Model

Building Characteristics:

Select Building Assumptions

☒ Use ratio for Qsoil/Qbuilding (recommended if no site specific data available)
☐ Specify Qsoil and Qbuilding separately; calculate ratio

[Click to change assumptions](#)

	Units	Symbol	Value	Default	Potential Span	CV	Flag	Comment
Building setting		Bldg_Setting	Residential	Residential				
Foundation type		Found_Type	Slab-on-grade	Slab-on-grade				
Depth below grade to base of foundation	(m)	Lb	0.10	0.10	0.1 - 2.44	NA		
Foundation thickness	(m)	Lf	0.10	0.10	0.1 - 0.25	NA		
Fraction of foundation area with cracks	(-)	eta	0.001	0.001	0.00019-0.0019	1.00		
Enclosed space floor area	(m2)	Abf	150.00	150.00	80 - 200	NA		
Enclosed space mixing height	(m)	Hb	2.44	2.44	2.13 - 3.05	NA		
Indoor air exchange rate	(1 / hr)	ach	0.45	0.45	.15-1.26	NA		
Qsoil/Qbuilding	(-)	Qsoil_Qb	0.0030	0.0030	0.0001 - 0.05	1.24		
Calc: Building ventilation rate	(m3/hr)	Qb	164.70	164.70	NA	0.30		
Calc: Average vapor flow rate into building	(m3/hr)	Qsoil	0.49	0.49	NA	NA		

Use defaults for generic building unless different site-specific values are known

Vapor Intrusion

Using the Johnson & Ettinger Model

Model Input Site Name/Run Number:

Chemical Name: Tetrachloroethylene CAS No. 127-18-4

Depth below grade to water table: 4.50 meters

Vadose zone characteristics:	Units	Symbol	Value	Default	Potential Span	CV	Flag
Stratum A (Top of soil profile): R							
Stratum A SCS soil type		SCS_A	Silt				
Stratum A thickness (from surface)	(m)	hSA	4.50				
Stratum A total porosity	(-)	nSA	0.489	0.489	NA	0.20	
Stratum A water-filled porosity	(-)	nwSA	0.167	0.167	0.05 - 0.28	0.25	
Stratum A bulk density	(g/cm ³)	rhoSA	1.350	1.350	NA	0.05	
Stratum B (Soil layer below Stratum A):							
Stratum B SCS soil type		SCS_B	Not Present				
Stratum B thickness	(m)	hSB	0.00				
Stratum B total porosity	(-)	nSB			NA	NA	
Stratum B water-filled porosity	(-)	nwSB			NA	NA	
Stratum B bulk density	(g/cm ³)	rhoSB			NA	NA	
Stratum C (Soil layer below Stratum B):							
Stratum C SCS soil type		SCS_C	Not Present				
Stratum C thickness	(m)	hSC	0.00				
Stratum C total porosity	(-)	nSC			NA	NA	
Stratum C water-filled porosity	(-)	nwSC			NA	NA	
Stratum C bulk density	(g/cm ³)	rhoSC			NA	NA	
Stratum directly above the water table							
Stratum A, B, or C		src_soil	Stratum A				
Height of capillary fringe	(m)	hcz	1.630	1.630	NA	NA	
Capillary zone total porosity	(-)	ncz	0.489	0.489	NA	0.20	
Capillary zone water filled porosity	(-)	nwcz	0.382	0.382	NA	0.24	

Can select up to 3 soil stratum, specifying soil type for each

Vapor Intrusion

Using the Johnson & Ettinger Model

Exposure Parameters:	R	Units	Symbol	Value	Default	Potential Span	CV
Target risk for carcinogens		(-)	Target_CF	1.00E-06	1.00E-06	NA	NA
Target hazard quotient for non-carcinogen:		(-)	Target_HQ	1	1	NA	NA
Exposure Scenario			Scenario	Residential	Residential		
Averaging time for carcinogens		(yrs)	ATc	70	70	NA	NA
Averaging time for non-carcinogens		(yrs)	ATnc	26	26	NA	NA
Exposure duration		(yrs)	ED	26	26	NA	NA
Exposure frequency		(days/yr)	EF	350	350	NA	NA
Exposure time		(hrs/24 hrs)	ET	24	24	NA	NA
Mutagenic mode-of-action factor		(yrs)	MMOAF	72	72	NA	NA

Default cancer risk is 1×10^{-6} and hazard index is 1, but these can be changed

Vapor Intrusion

Using the Johnson & Ettinger Model

Model Output

Chemical Name: Tetrachloroethylene CAS No. 127-18-4

Site Name/Run Number: Example, Run 1

Range is based on the real values, as reported in the li

Source to Indoor Air Attenuation Factor	Units	Symbol	Value	Range	Default	Default Range
Groundwater to indoor air attenuation coefficient	(-)	alpha	2.5E-05	2.0E-05 - 2.5E-05	2.5E-05	2.0E-05 - 2.5E-05

Predicted Indoor Air Concentration	Units	Symbol	Value	Range	Default	Default Range
Indoor air concentration due to vapor intrusion	(ug/m3)	Cia	9.1E+00	7.3E+00 - 9.1E+00	9.1E+00	7.3E+00 - 9.1E+00
	(ppbv)		1.3E+00	1.1E+00 - 1.3E+00	1.3E+00	1.1E+00 - 1.3E+00

Predicted Vapor Conc. Beneath Foundation	Units	Symbol	Value	Range	Default	Default Range
Subslab vapor concentration	(ug/m3)	Css	3.0E+03	1.8E+02 - 7.3E+04	3.0E+03	7.3E+04 - 9.1E+04
	(ppbv)		4.5E+02	2.7E+01 - 1.1E+04	4.5E+02	1.1E+04 - 1.3E+04

For this scenario, the predicted indoor air concentration is 9.1 $\mu\text{g}/\text{m}^3$, below the SSL of 11 $\mu\text{g}/\text{m}^3$.

Vapor Intrusion

Using the Johnson & Ettinger Model

Model Output

Site Name/Run Number: Example, Run 1

Chemical Name: Tetrachloroethylene CAS No. 127-18-4

Risk Calculations	Units	Symbol	Value	Range	Default	Range
Risk-Based Target Screening Levels Scenario: Residential						
Target risk for carcinogens	(-)	Target_CR	1E-06	-	1E-06	-
Target hazard quotient for noncarcinogens	(-)	Target_HQ	1	-	1	-
Target indoor air concentration	(ug/m3)	Target_IA	1.08E+01	-	1.08E+01	-
	(ppbv)		1.59E+00	-	1.59E+00	-
Target groundwater concentration	(ug/L)	Target_GW	5.95E+02	1.9E+02 - 7.4E+02	5.95E+02	3.3E+02 - 7.4E+02
Incremental Risk Estimates						
Incremental cancer risk from vapor intrusion	(-)	Cancer_Risk	8.40E-07	3.8E-07 - 8.5E-07	8.40E-07	6.8E-07 - 8.5E-07
Hazard quotient from vapor intrusion	(-)	HQ	2.17E-01	1.8E-01 - 2.2E-01	2.17E-01	1.8E-01 - 2.2E-01

The predicted cancer risk is 8.4×10^{-7} and hazard index is 0.217, below the respective screening levels of 1.0×10^{-6} and 1.0. The target groundwater concentration is 595 µg/L.

Vapor Intrusion

Modeling vs Indoor Air Sampling

Modeling can be a useful line of evidence and may be used in lieu of indoor air sampling in some scenarios:

- The plume is currently under a vacant lot
- The plume is migrating towards buildings of interest but hasn't reached them yet
- Property owners won't allow access
- Properties have other VOC sources that can influence results

Vapor Intrusion

Modeling – Communication to NDEP

- Explain selection of each input parameter
 - Can use defaults or model recommended when site-specific data are lacking
- Describe assumptions and assess variability in available data
- Use conservative values (highest current or recent concentrations, coarsest soil type, etc.) to identify worst case scenario.
- Compare predicted indoor air concentrations to current SSLs for Residential and Industrial sites.

Vapor Intrusion

Indoor Air Sampling

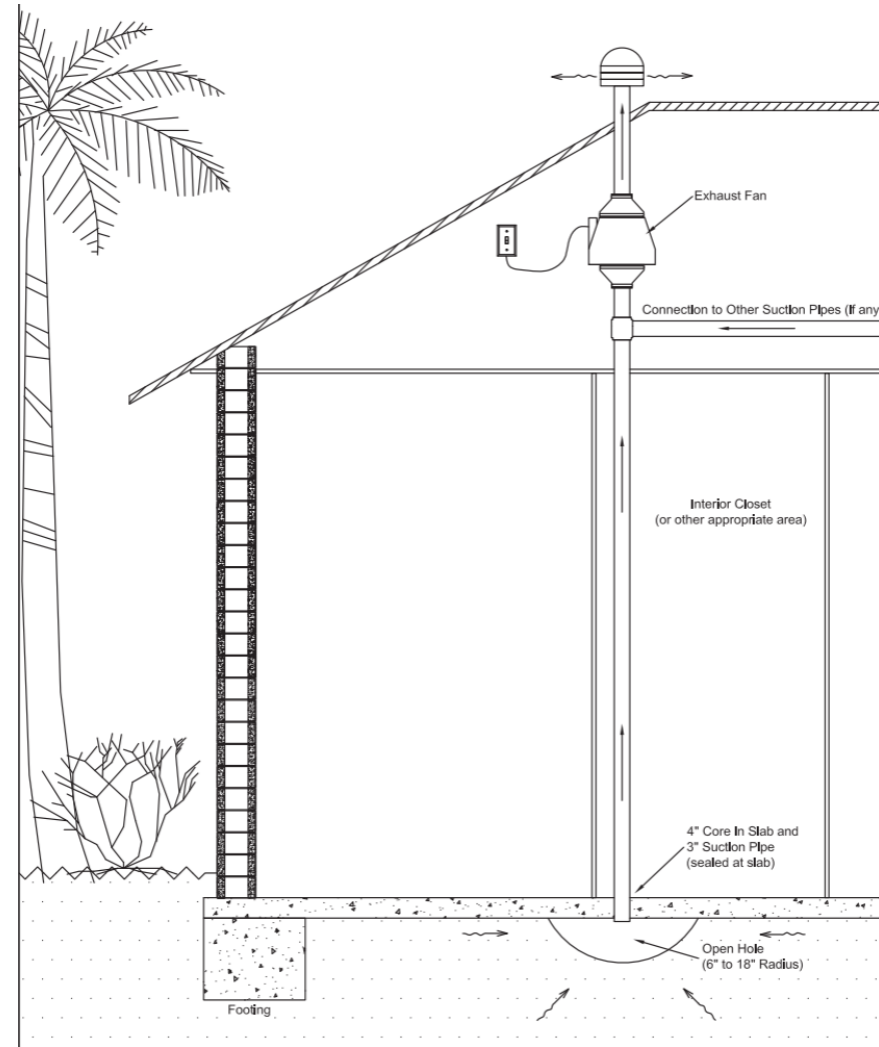
- Requires outreach to property owners and access agreements
- Pre-sampling survey to identify background influence



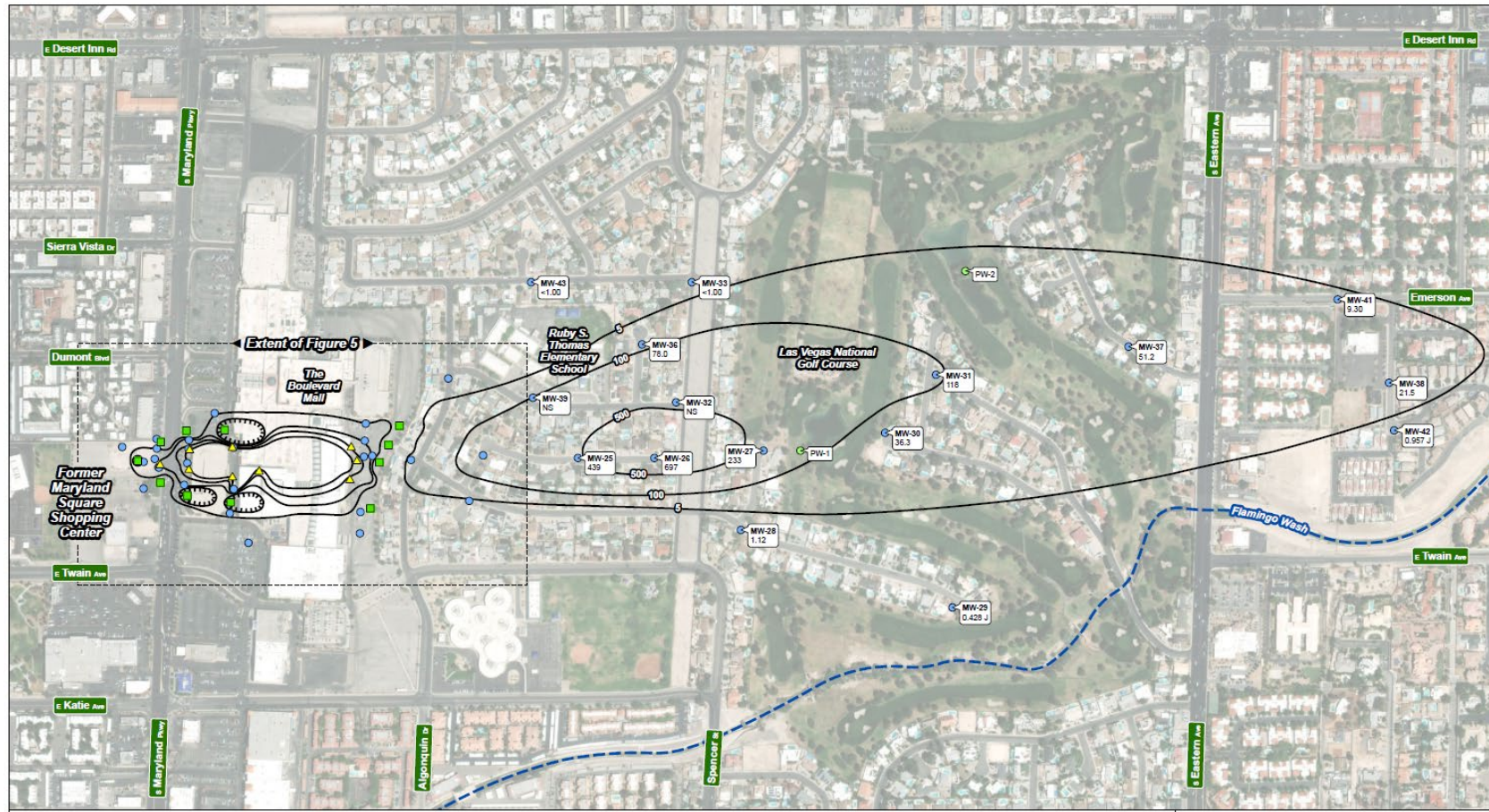
Vapor Intrusion Mitigation

Sub-slab depressurization system is typical

- Voluntary on part of property owner
- Paid for by party responsible for contaminant release

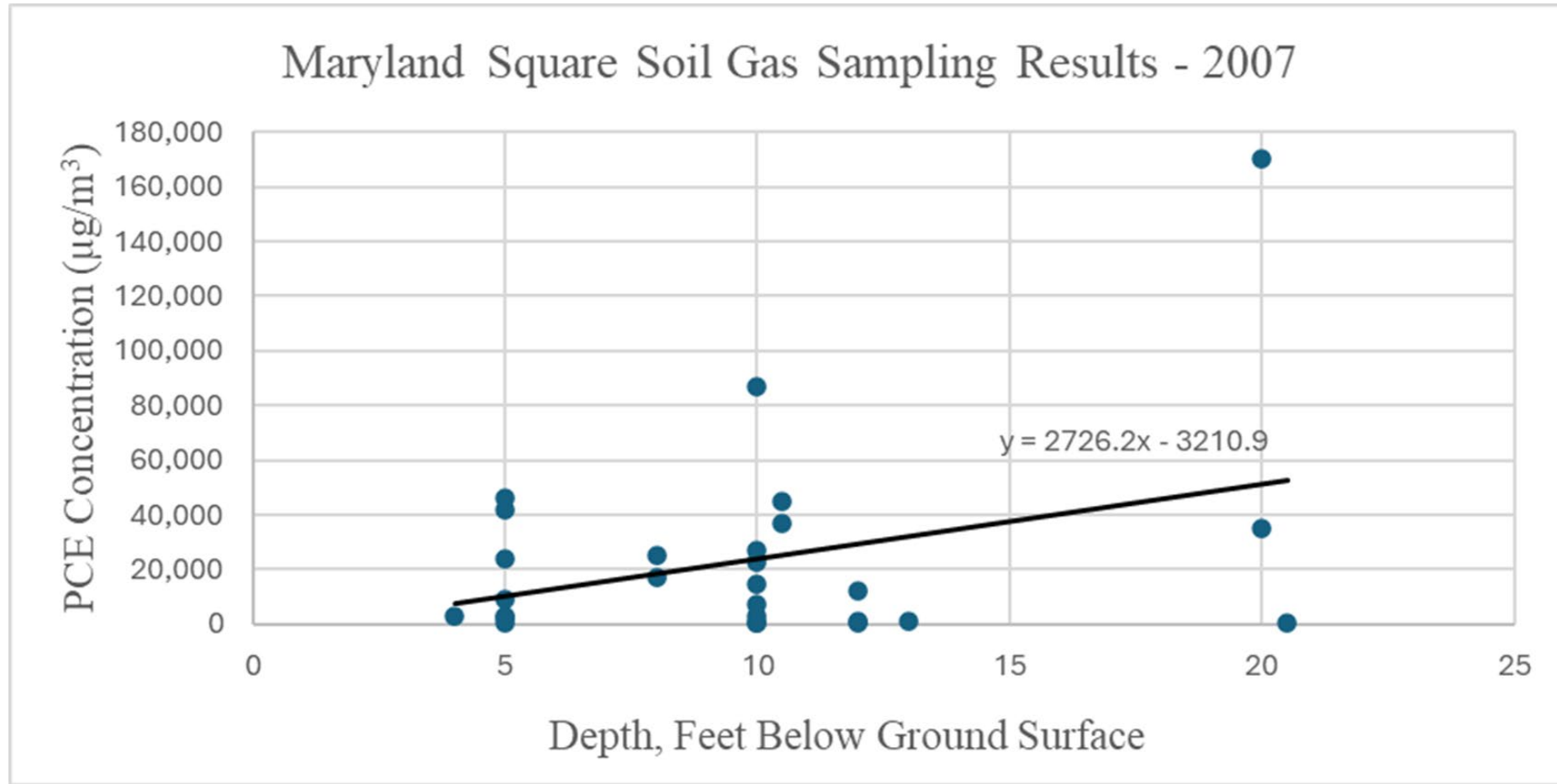


Vapor Intrusion Maryland Square Case Study



Vapor Intrusion

Maryland Square Case Study



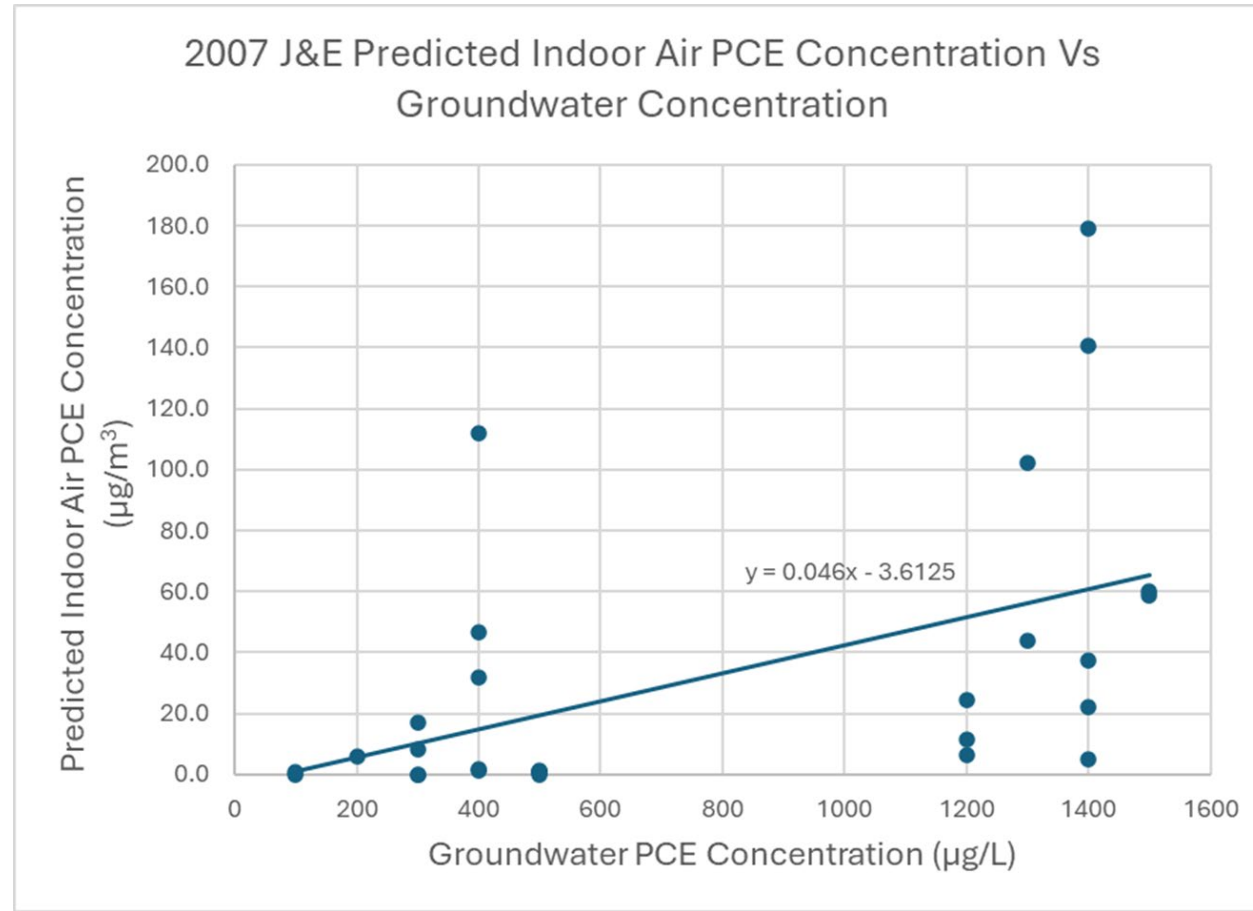
Vapor Intrusion

Maryland Square Case Study

Sample ID	Depth (feet bgs)	Soil Vapor PCE ($\mu\text{g}/\text{m}^3$)	J&E Modeling Predicted Indoor Air PCE ($\mu\text{g}/\text{m}^3$)
SVB-01-05	5	2,500	6.1
SVB-02-04	4	3,000	8.1
SVB-03-05	5	46,000	112.1
SVB-03-12	12	800	1.1
SVB-04-05	5	400	1.0
SVB-04-12	12	1,000	1.4
SVB-05-08	8	25,000	46.8

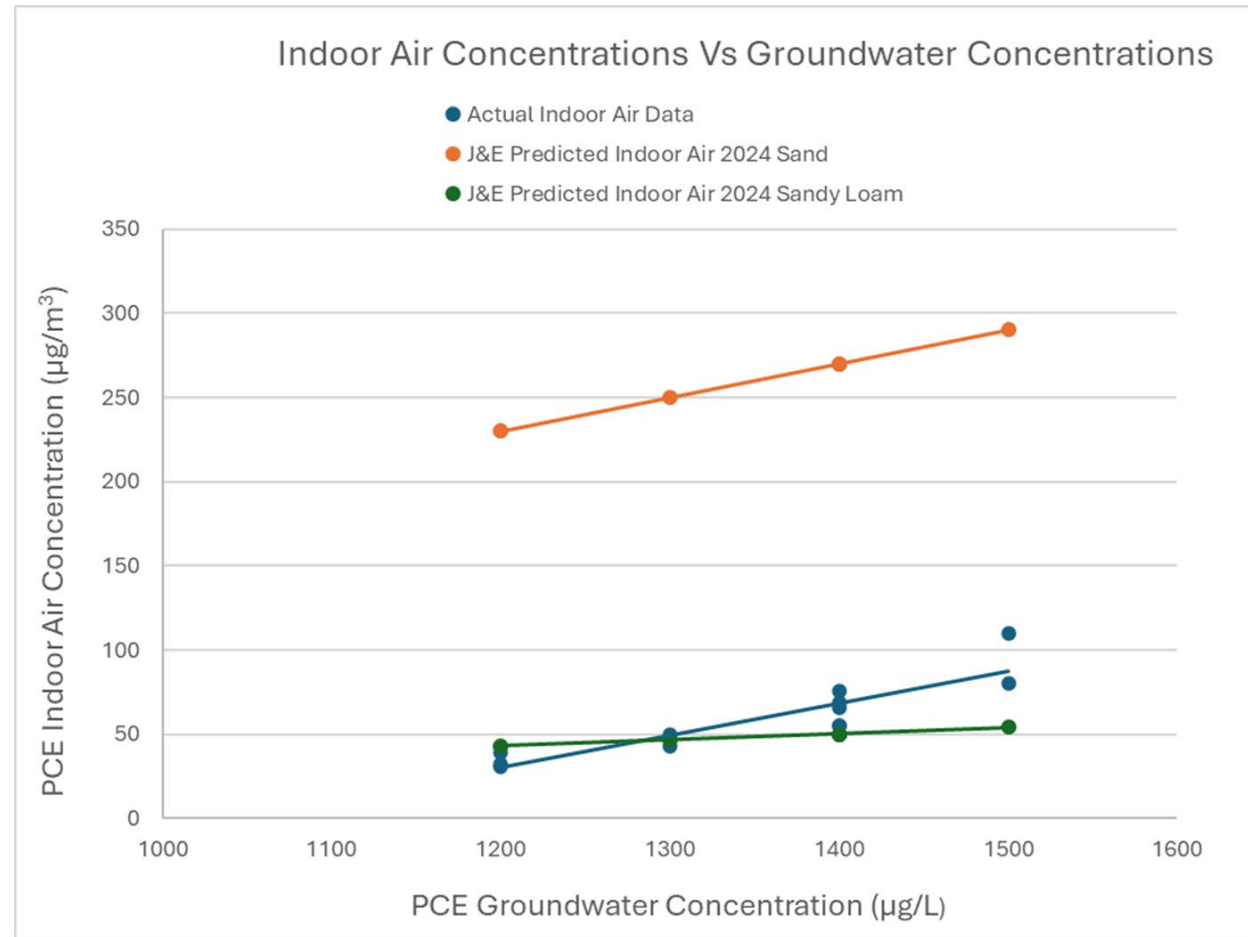
Vapor Intrusion

Maryland Square Case Study



Vapor Intrusion

Maryland Square Case Study



Vapor Intrusion

Maryland Square Case Study

- Indoor air sampling offered annually to households above plume with PCE concentrations $>100 \mu\text{g/L}$
- SSDS offered to households with indoor air PCE $>9.4 \mu\text{g/m}^3$
- ~14 houses have active SSDSs
- Ongoing remediation in the source area

Vapor Intrusion Summary

- Assessment not required for most petroleum sites due to biodegradation in vadose zone. May need to be considered for sites with depth to groundwater <5 feet for dissolved phase, <15 feet for LNAPL or with very high soil vapor concentrations ($>10,000,000 \mu\text{g}/\text{m}^3$).
- No default screening distances or attenuation factors for chlorinated solvents. Use Johnson & Ettinger or similar to estimate indoor air concentrations given soil gas or groundwater data, temperature, and soil type.

Thank You! Questions?

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