



PATH TO CLOSURE SUBGROUP

POLL

What are the biggest barriers
you see to closing vapor
intrusion sites?

PATH TO CLOSURE

- Surveyed DTSC and Water Board case managers for vapor intrusion projects that have closed recently
- Identified 3 general categories of VI endpoints
 - Clean closure
 - VIMS and long-term monitoring
 - Low or no VI risk, but Site open for other reasons (groundwater, etc.)
- Found potential case studies that can be used in future workshops and trainings that exhibit different aspects of successful closures
- Recognized common themes for sites that achieved these endpoints

FLAVORS OF VI ENDPOINTS



- **No Further Action** – Unrestricted land use and unlimited exposure.
- **Low Threat Closure** – Water Board may close the case if contaminants are unlikely to pose an unacceptable threat.
- **Media Specific Closure** – Water Board may provide no further action for soil only
- **Certified Remedy with Land Use Control** – DTSC will do annual inspections and Five-Year Reviews.
- **Remedy Construction Complete** – DTSC may state that remedy is constructed and operating as designed with long term operation and maintenance.
- **Suitable to Occupy** – Cleanup and mitigation are functioning such that proposed occupants of the property will not be exposed to unacceptable risks.

COMMON THEMES OF VI SUCCESS

- Robust conceptual site model supported by adequate site-specific data
- Subsurface contaminant concentrations are:
 - Stable to decreasing
 - Low
 - Do not suggest an ongoing on-Site source or groundwater contamination
- Source areas addressed
- Indoor air test results below screening levels
- Long-term stewardship may be required



Best Practices

FOR WORKING WITH CALEPA...

- Scoping meetings
- Involve us early & often
- Be clear about deadlines & needs
- Address all comments & requests



Seal of Approval

VI SUCCESS STORY

Site in Bay Area

- Vacant lot
 - Formerly light industrial
 - No history of PCE use
 - Adjacent to property with open cleanup case with PCE contamination
 - PCE above screening level in one probe
 - Consultant proposed alternate attenuation factor
- No on-site sources and adjacent sources are remediated
 - PCE is fully delineated laterally and vertically
 - Sufficient spatial/temporal vapor data to show stability
 - Developer's construction plans includes multiple VIMS components
 - Groundwater is characterized and clean
 - Developer agreed to a period of monitoring
 - Agency agreed to accept alternate attenuation factor