

An Integrated Approach to LNAPL Remediation in Support of a Large-Scale Brownfield Redevelopment

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Presentation Agenda

General Methodology;

➤ Case Study:

- Background;
- Strategic Approaches;
- > Area 3 LNAPL Remediation;
- > Areas 1, 2 and 4 LNAPL Mobility;
- > Area 2 LNAPL Remediation;
- Regulatory Feedback;
- ≻ Redevelopment Status.

General Methodology

When to Remediate?

Remedial drivers present (risk-based or non-riskbased).

How to Remediate?

Risk: type/degree of risk (imminent/immediate or long term);

▹ Non-Risk:

- Existing/proposed use of property;
- Development/redevelopment plans, schedules and timelines.

General Methodology

How Long to Remediate?

- Remedial objectives and goals;
- > Ongoing review and evaluation of remediation metrics.

Note:

If remediation is required and <u>no feasible</u> remediation options exist, then implement necessary controls (engineering, institutional, and/or administrative) to mitigate risks or address concerns.

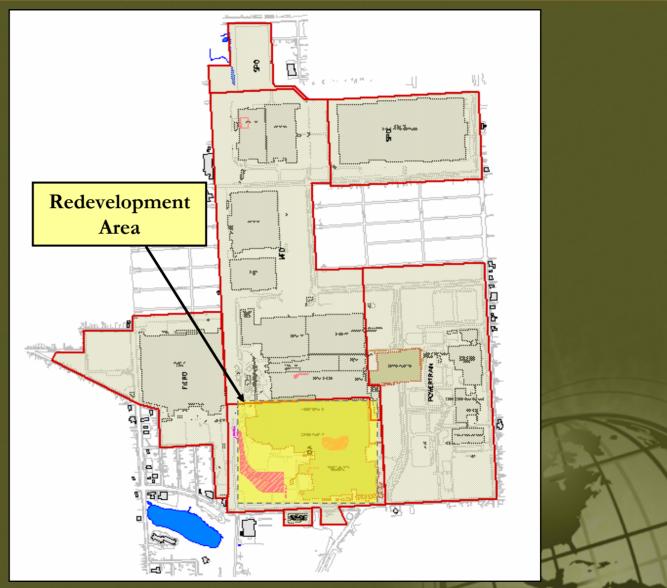
Case Study - Background

- Subject Site 600 acre industrial manufacturing facility in mid-western U.S.;
- 100 acres of unused portion of Site targeted for property redevelopment, including construction of 800,000 square foot slab-on-grade building;
- LNAPL discovered on various parts of redevelopment area;

LNAPL remediation deemed necessary to meet requirements for property redevelopment.



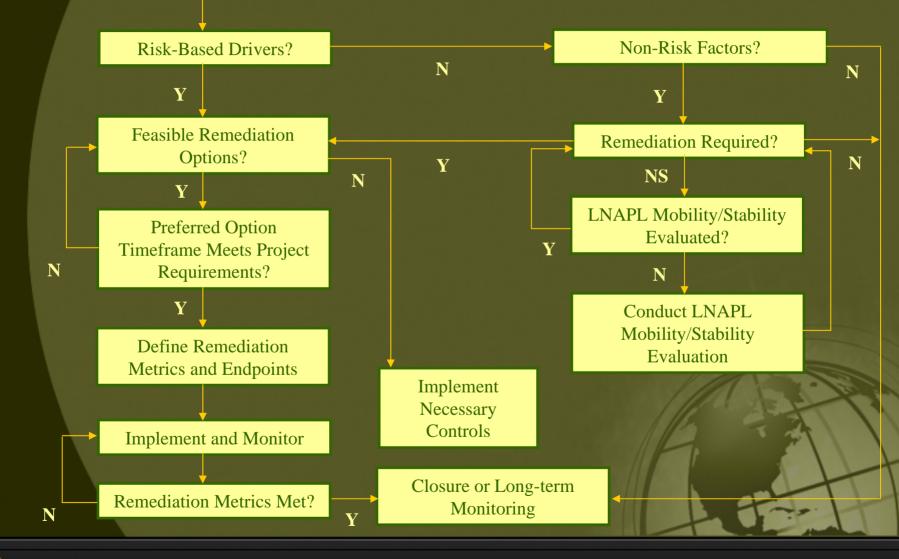
Case Study - Background



Case Study - Background

- Geology comprised of low permeability glacial soils (silts and clays with occasional sand seams) with several areas of sand fill material;
- Depth to air/LNAPL interface varies from approximately 15 to 30 feet bgs;
- LNAPL thicknesses vary from a sheen to 12 feet; and
- Majority of LNAPL fingerprinted as a weathered No. 2 fuel oil/diesel with lesser amounts of No. 6 fuel oil. Some LNAPL predominantly No. 6 fuel oil.

Develop LNAPL Conceptual Site Model (LCSM)



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Risk-Based Remedial Driver:

Presence of methane (due to anaerobic degradation of LNAPL) and associated potential risks for future building occupants.

Non-Risk Remedial Factors:

Aggressive reduction of LNAPL plume mass in area of proposed building construction to support property redevelopment efforts.

Risk-Based Strategy

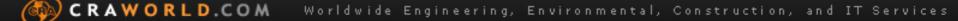
- No feasible remediation option to remove sufficient LNAPL to prevent future methane issues;
- Implemented necessary controls engineering control: passive venting system beneath entire floor slab for new building.

Non-Risk Strategy

To develop LNAPL remediation/management strategies proportionate to property redevelopment plans and schedules, and in particular, vertical construction of proposed building. <u>Time was of the essence!</u>

Non-Risk Strategy

- Redevelopment area divided into smaller LNAPL target areas based on: LNAPL type, soil type, and property redevelopment plans/schedules for that location;
- Area 1: Soil Type silt and clay LNAPL Type – heavy oil, some diesel Location – west of proposed building Issues – none identified Priority – low to medium (L-M)

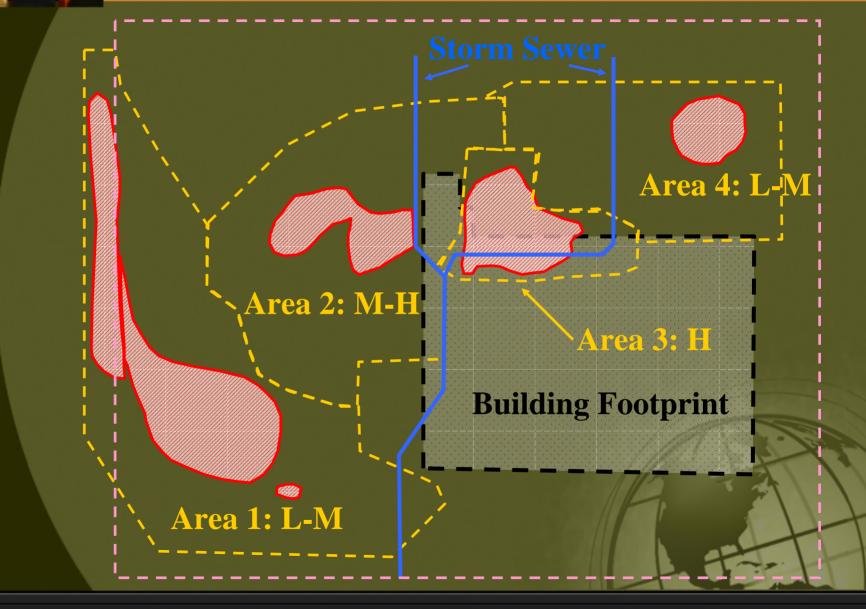


- Area 2: Soil Type sand
 LNAPL Type diesel
 Location northwest of proposed building
 Issues adjacent to storm sewer and
 proposed building footprint
 Priority medium to high (M-H)
- Area 3: Soil Type silt and clay with sand seams/layers
 LNAPL Type – diesel
 Location – beneath and north of proposed building footprint; surrounds sewer
 Priority – high (H)

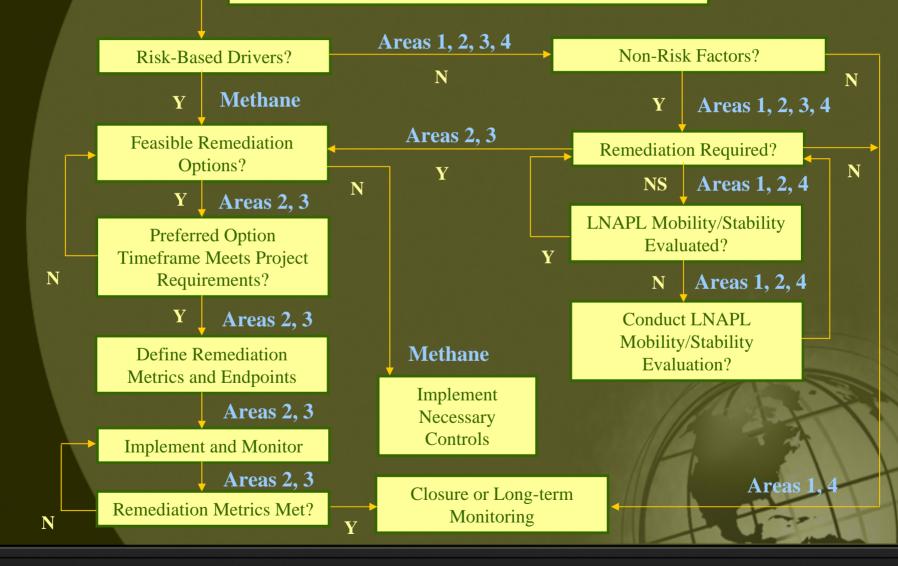


 Area 4: Soil Type – silt and clay
 LNAPL Type – diesel, some light end hydrocarbons
 Location – north-northeast of proposed building footprint
 Priority – low to medium (L-M)

Based on H priority designation, Area 3 was targeted for aggressive LNAPL recovery – endpoint was to recover as much LNAPL as feasibly practical prior to building construction in March 2006.



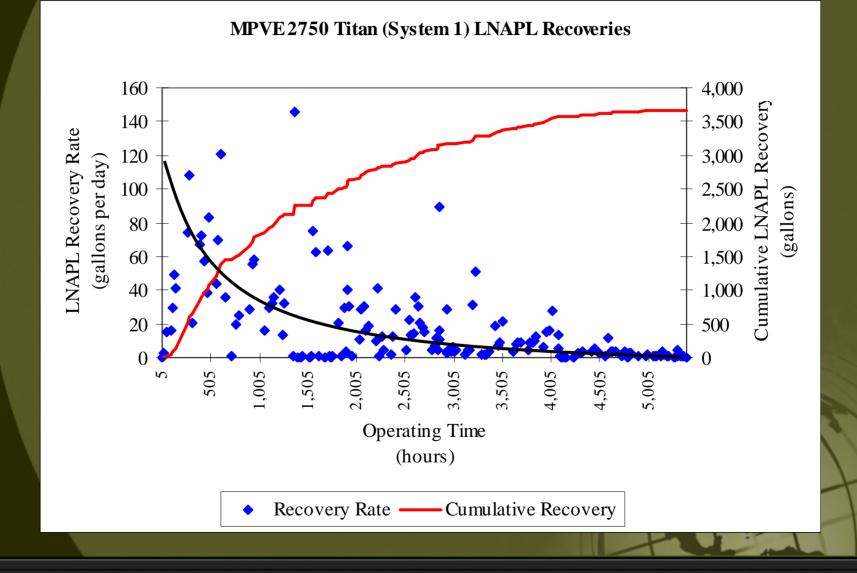
Develop LNAPL Conceptual Site Model (LCSM)



Area 3: LNAPL Remediation



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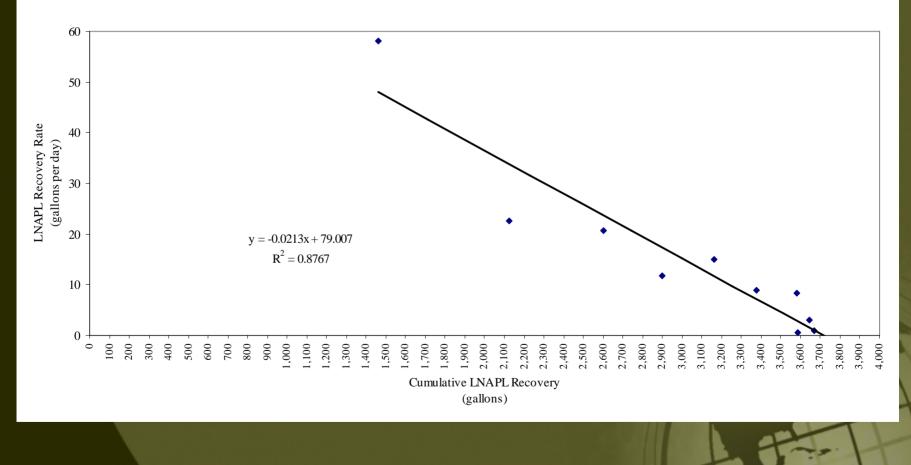


MPVE System 1 Semi-Log LNAPL Recovery Projection



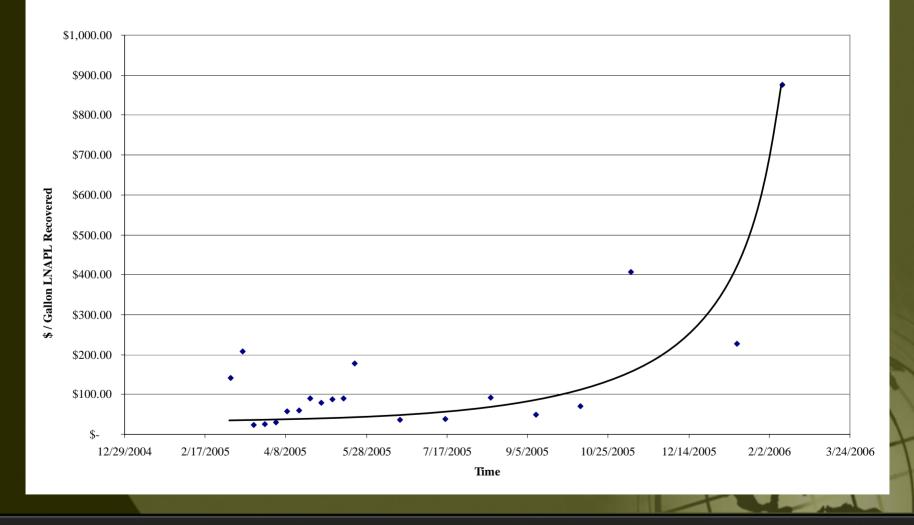


MPVE System 1 Decline Curve Analysis





MPVE 2750 Titan (System 1) Operation Cost Per Gallon LNAPL Recovery



Area 3: LNAPL Remediation

- Based on evaluation of remediation metrics, active recovery was terminated in February 2006;
- Some wells (in poor recovery areas) continued to exhibit up to 8 feet of LNAPL;
- Large in-well thicknesses despite low recovery suggest that LNAPL is present in various seams under confined conditions;
- U.S. Environmental Protection Agency (U.S. EPA) reviewed LNAPL performance and agreed that aggressive recovery using MPVE systems could be terminated.

Methodology

Conducted laser induced fluorescence (LIF) survey using Rapid Optical Screening Tool (ROST) technology (128 survey points);

 Collected undisturbed soil cores in select (24) locations of soil zones exhibiting varying degrees of relative fluorescence during ROST;

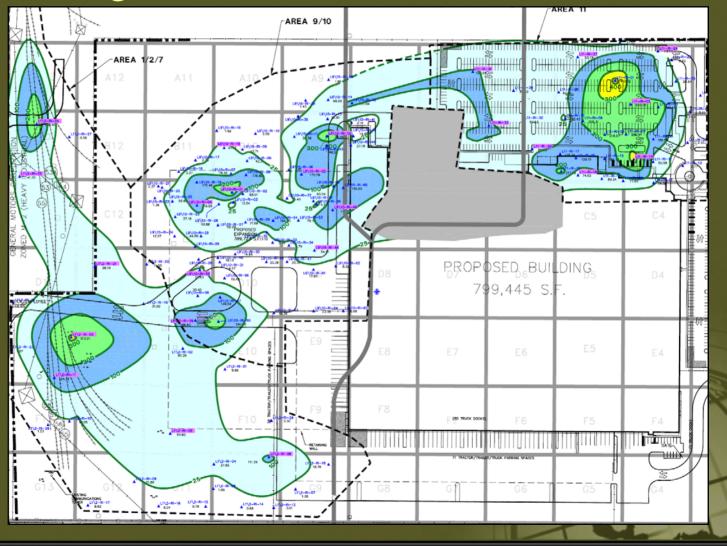
 Submitted soil cores for laboratory photography and testing of key LNAPL mobility parameters;

Evaluated LNAPL mobility using three methods;

Method 1: Compared laboratory measured LNAPL saturation against corresponding residual saturation;

- Method 2: Used laboratory measured oil and water conductivity results (on fully saturated samples) to calculate LNAPL mobility and velocity values;
- Method 3: Used laboratory measured LNAPL saturation results and API/Charbeneau methods to calculate LNAPL relative permeability, conductivity, mobility and velocity values.

> Averaged (1-foot thick) ROST Plan View





Method 1:

- Single point centrifugal test: 16 of 16 LNAPL saturations greater than residual saturation (4 significantly greater);
- Capillary pressure test: 4 of 6 LNAPL saturations greater than residual saturation (3 significantly greater);
- Results suggest potential for inherent LNAPL mobility in interior portions of LNAPL areas, with limited or no mobility near fringe areas.

Method 2:

Laboratory measured oil saturation and conductivity values were used to calculate LNAPL mobility and velocity values.

Method 3:

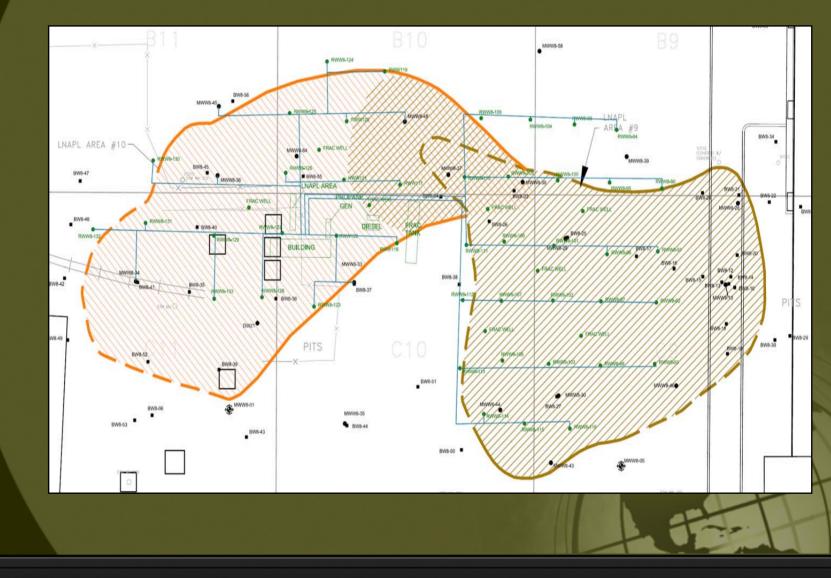
- The laboratory measured LNAPL saturation value was deemed to represent the <u>maximum</u> LNAPL saturation point at the sample location (based on ROST and UV photography);
- This measured <u>maximum</u> saturation was then used to determine LNAPL relative permeability, conductivity, mobility and velocity.

- Based on the Method 2 calculation results, 3 of 6 test locations exhibited an LNAPL velocity in excess of 1 x 10⁻⁶ cm/s, which represents the *de minimis* mobility threshold for LNAPL (ASTM, 2007);
- Based on the Method 3 calculation results, none of the 24 test locations exhibited an LNAPL velocity in excess of 1 x 10⁻⁶ cm/s.

Area 2: LNAPL Remediation

- Based on the M-H priority rating for Area 2 and the results of the LNAPL mobility evaluation, it was determined that aggressive LNAPL recovery (using MPE/PAL and PF) would be conducted in this area.
- A network of fifty 4-inch PVC extraction wells were installed in Area 2;
- MPE/PAL and PF operations were conducted using a 100 Hp MPVE system.

Area 2: LNAPL Remediation



Area 2: LNAPL Remediation

After approximately 104 hours of MPE operation, a total of 28 gallons of LNAPL and 28,165 gallons of water were recovered;

LNAPL recovery went asymptotic almost immediately;

Based on the relatively low LNAPL recovery rates, and costs to run the MPVE system, LNAPL recovery was terminated in Area 2.



- LNAPL Mobility Evaluation Report (including Area 2 LNAPL remediation) submitted to U.S. EPA;
- > Currently responding to U.S. EPA comments.

- 3rd Party tenant commenced concrete removal and crushing activities and property grading in Spring 2005;
- Vertical construction of building commenced as scheduled in March 2006, after the completion of Area 3 LNAPL remediation activities;
- All LNAPL extraction wells in Areas 2 and 3 abandoned in Summer and Fall 2006;
- > Outer shell of building completed in late 2006.







