

Tighe&Bond

Quality Site Assessments & Investigations
Using the
Conceptual Site Model Approach



CONDUCTING QUALITY SITE ASSESSMENTS

Using the Conceptual Site Model (CSM) Approach

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THE CONCEPTUAL SITE MODEL

Definition

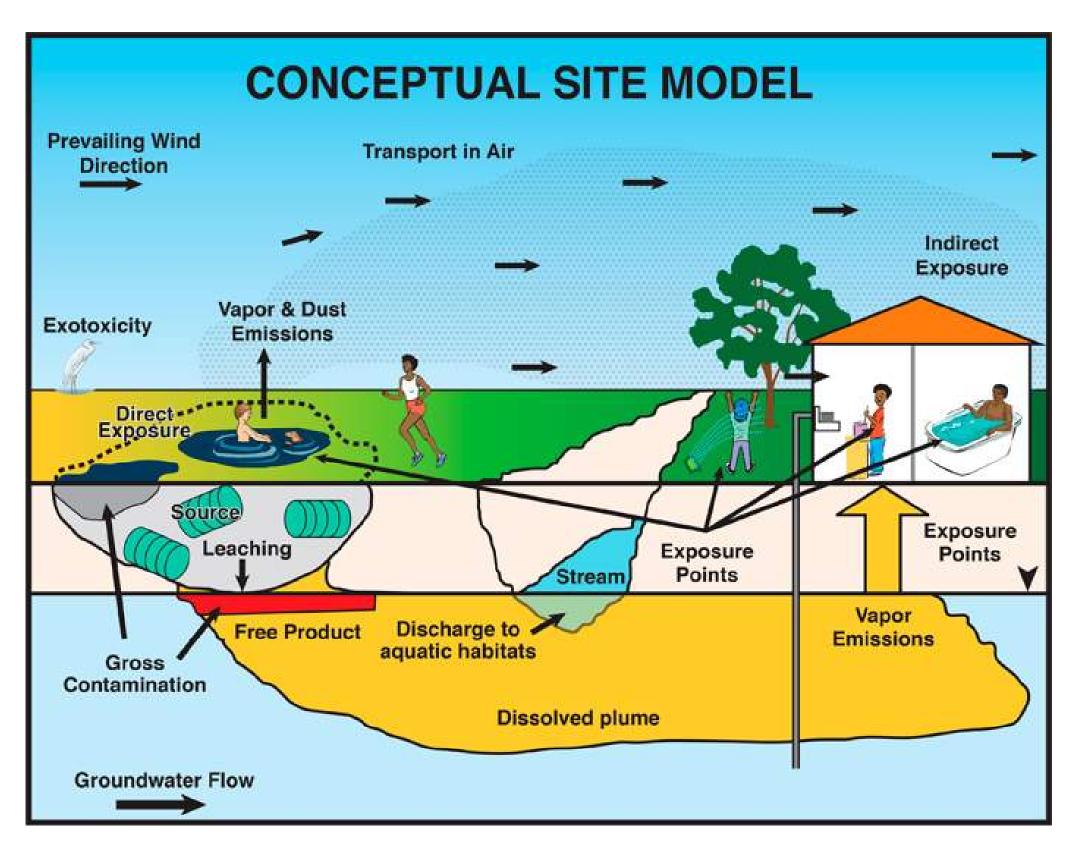
EPA

"The Conceptual Site Model (CSM) is an iterative, 'living representation' of a site that summarizes and helps project teams visualize and understand available information"

- Temporal (time-related)
- Iterative
- Living Model
- Guides assessment
- Informs cleanup objectives
- Exposure pathways

A CSM is continually "redeveloped" using:

- Known Information
- Hypothesized Information



Source: Interstate Technology Regulatory Counsel (ITRC) TPH Risk Evaluation at Petroleum-Contaminated Sites



PHASE I CONCEPTS

ASTM Phase I versus MCP Phase I

PHASE I CONCEPTS

An Objective of "Phase I" is to develop an Initial CSM

- ASTM Phase I Environmental Site Assessment Gathers information on site characteristics
 - Satisfies EPA All Appropriate Inquiries (AAI) to avoid property-owner liability for property transactions
 - Identifies RECs, HRECs, CRECs
 - Records review
 - Physical observations
 - Interviews
 - CSM is not specifically mentioned, but the groundwork is laid for initial CSM development
 - Phase I ESA information are used to develop an initial CSM for sampling plan design (Phase II)
- Massachusetts Contingency Plan (MCP) Phase I Initial Site Investigation Report
 - Satisfies MCP regulatory requirements following a "Reportable Release"
 - Records review
 - Physical observations
 - Physical assessment (initial borings, wells, analytical data)
 - Potential migration pathways and exposure potential
 - Preliminary CSM and conclusions





DEVELOPING THE CONCEPTUAL SITE MODEL

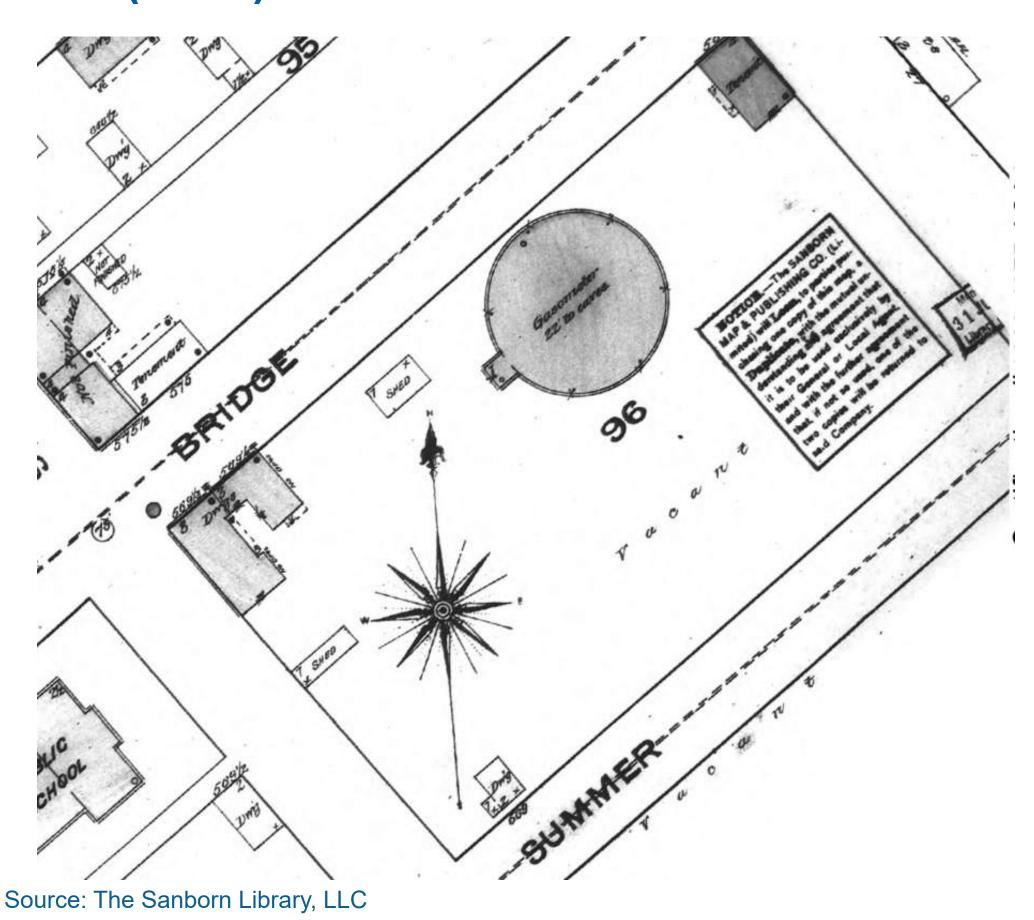
Using the "Phase I" Process

Known Information

- From Observations
 - Chemical storage and use
 - Manufacturing processes
 - Cracks, voids, penetrations
 - Staining
 - Presence of human/environmental receptors

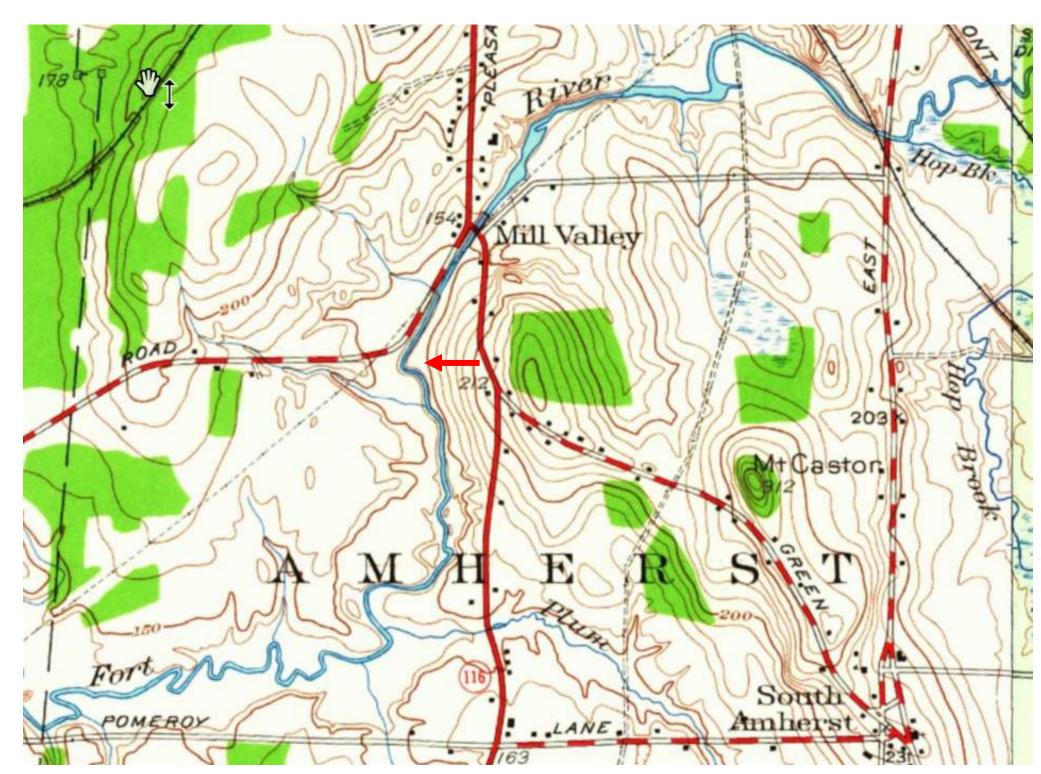
-From Records

- As-built drawings
- Floor drains
- Septic systems
- MSDS/SDS
- UST tightness testing
- Sanborn Fire Insurance Maps
- Analytical Data (sometimes available)



Hypothesized Information

- From Observations
 - Contaminant source locations
 - Land topography
 - Building remnants
 - Contaminant distribution, transport and fate
- From Records
 - Topographic maps
 - Aerial photographs
 - Historical descriptions of similar industrial processes
 - Surficial geologic maps



Source: United State Geological Society

What Makes a Good CSM?

- Adequate Site Characterization: What and where is the source, and where is it going?
 - Source magnitude
 - Contaminants of concern and source(s) identified
 - General contaminant behavior discussed and hypothesized in CSM
 - Site physical characteristics
 - Extent of release
 - Potential exposure pathways identified
 - Preferential pathways contemplated
 - Potential receptors are identified

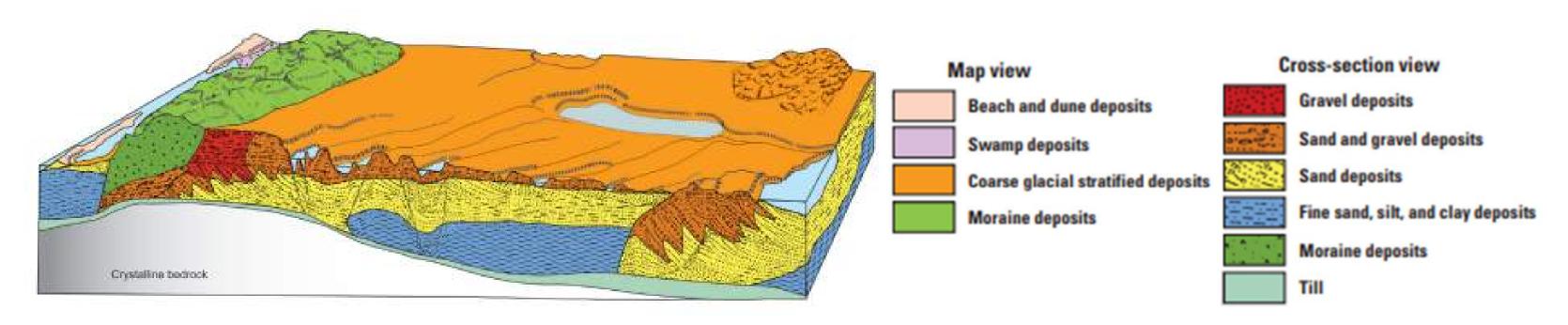
- Refined with New Information

- Assume initial CSM is incomplete
- Discussion of data is incorporated
- CSM assumptions are refined each report
- Confounding sources discussed as needed (indoor air)
- Discuss deviations from CSM and implications



Physical Setting (Current Mapping, Site Reconnaissance)

- Establishes general use of the property and adjacent property uses
- Population density and human receptors
- Sensitive environmental receptors
- Frequency and intensity of site use
- Site geology
- Topography
- Hydrogeology



Source: USGS Surficial Geologic Map of the Heath-Northfield-Southwick-Hampden 24-Quadrangle Area in the Connecticut Valley Region, West-Central Massachusetts (Janet R. Stone and Mary L. DiGiacomo-Cohen)



Private Records - Current and Historical Records

- Past site assessments
- Facility as-built drawings, stormwater pollution prevention (SWPP) plans
- SDS (MSDS) indicating use of hazardous substances on the property
- Waste handling records (SQG, LGQ)
- Process diagrams/schematics
- Engineering controls

Public Records - Current and Historical

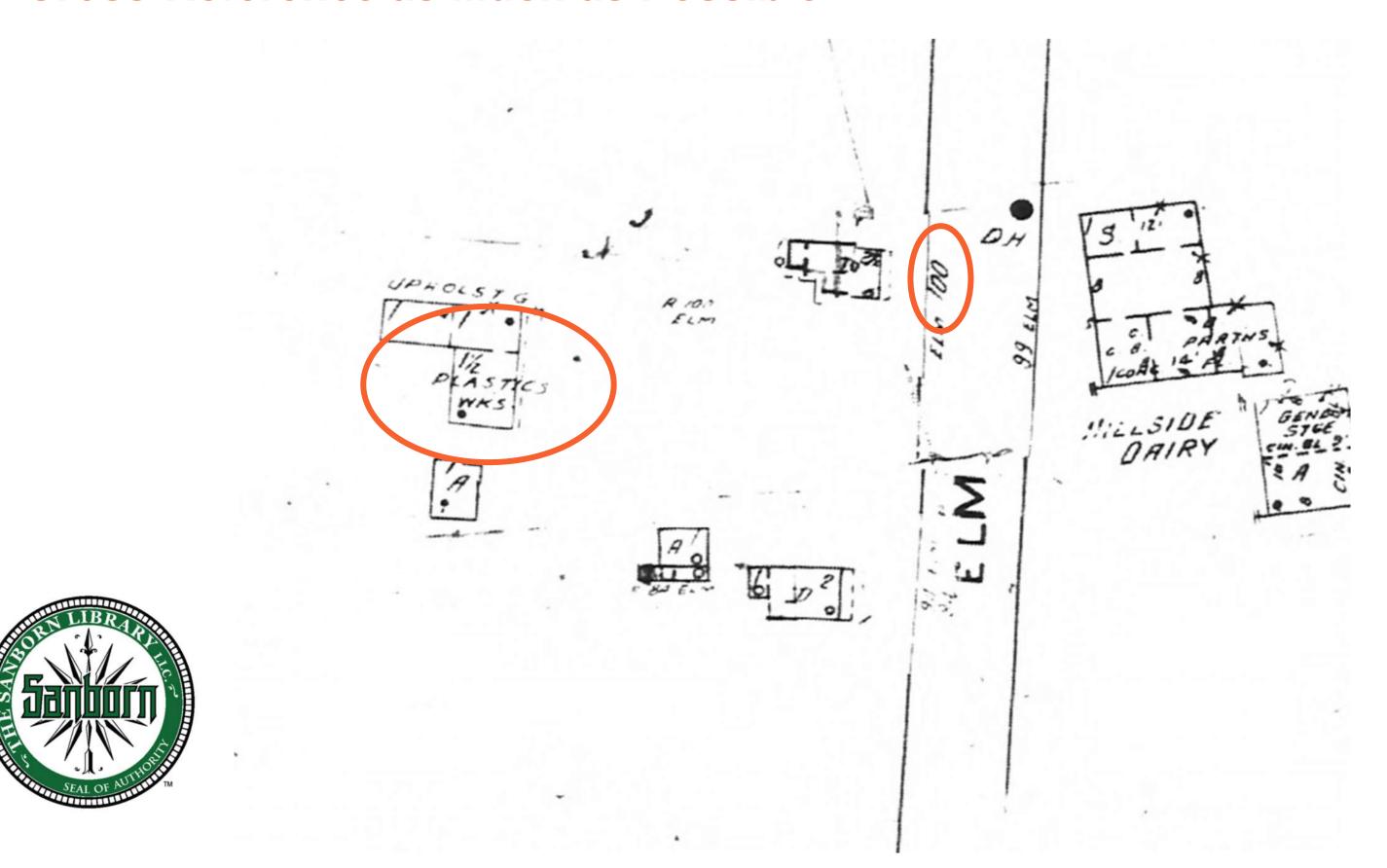
- Ownership records
- Newspaper articles, local history
- Municipal records

Cross-Reference as Much as Possible!

Use multiple records to confirm/bolster CSM hypotheses



Cross-Reference as Much as Possible



Cross-Reference as Much as Possible

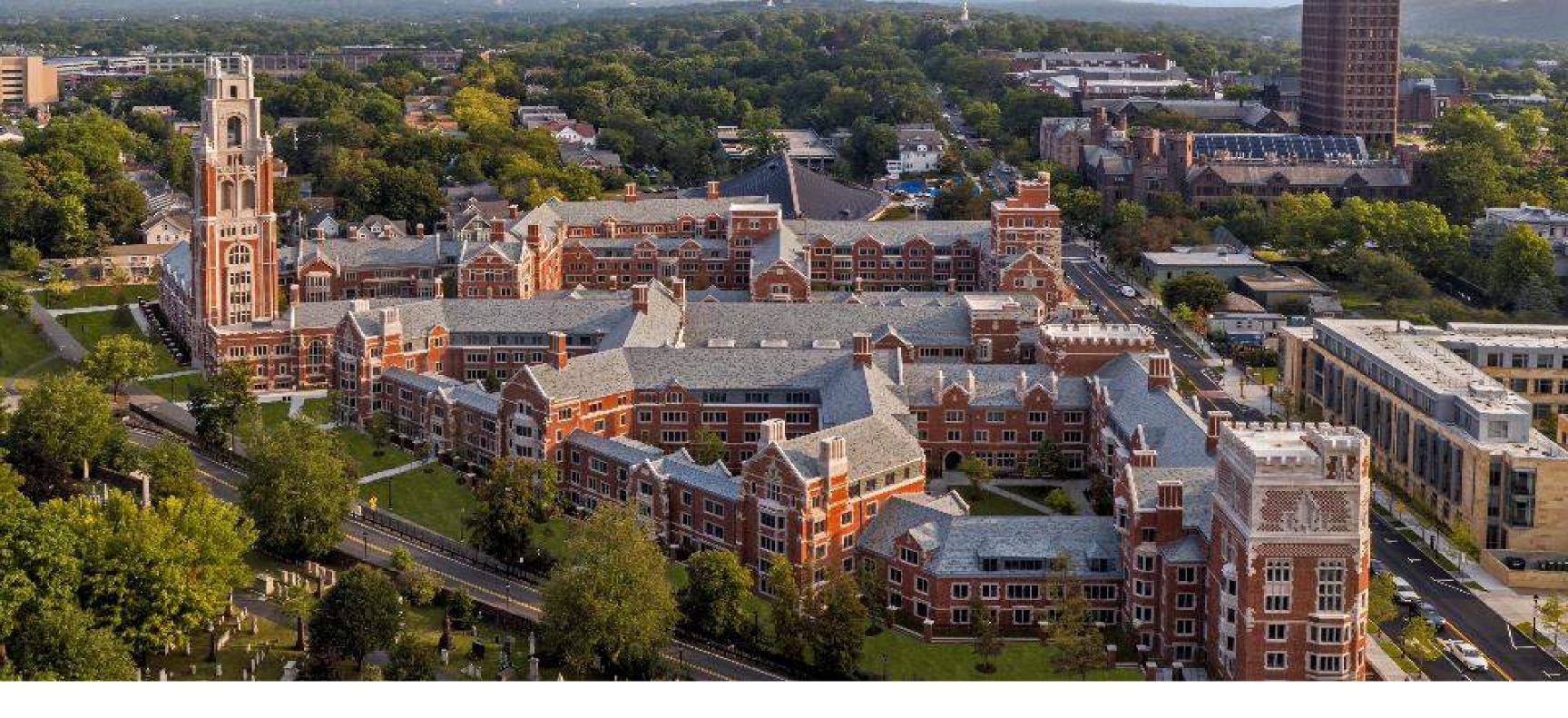


What Resources are Important?

- The MCP and ASTM specify which records to review
 - Not a "one size fits all" situation
 - It is up to the LSP/EP to decide which records deserve detailed analysis based on sitespecific conditions
 - Focus on records that will materially affect CSM development
 - Keep discussions practical

- MassDEP MCP Phase I Report:

- Disposal Site Map
- Site History
- OHM Storage History
- Site Hydrogeological Characteristics
- Nature and Extent of Contamination
- Migrations Pathways and Exposure Potential
- CSM and Conclusions



EXAMPLES OF COMMON CONTAMINANTS

Characteristics, Transport and Fate

COMMON CONTAMINANTS

ASTM Phase I ESA

- CERCLA Hazardous Substances 800 substances and 1,500 radionuclides
- Common EPA analytical methods: TPH, VOCs, SVOCs, "RCRA 8" metals, PCBs
- New ASTM 2021 standard includes non-CERCLA substances as "Non-Scope" items
 - PFAS is not a CERCLA Hazardous Substance
 - PFAS is regulated by MassDEP
 - Additional information on the 2021 changes to the ASTM E-1527 standard available (contact Jen Griffith)

MCP Phase I Report

- "Oil and Hazardous Materials" (OHM)
- EPA analytical methods apply
- MassDEP analytical methods:
 - Hydrocarbon Ranges EPH, VPH, APH
 - "MCP 14" metals
- Any site-specific "toxic" substance may be evaluated (eg. industry-specific chemicals)



COMMON CONTAMINANTS AND SOURCES

Volatile Organic Compounds (VOCs)

- Light, organic solvents (industrial manufacturing/degreasing)
- Light petroleum distillates (gasoline storage)
- Chlorinated solvents (military bases, dry cleaners)

Semi-Volatile Organic Compounds (SVOCs)

- Heavy petroleum distillates (fuel tanks, automotive waste oil, hydraulic fluid)
- PCBs (electrical transformers, substations, burn pits)
- PAHs (coal gasification, combustions)
- Pesticides and herbicides (production, preparation and storage facilities)

PFAS

- Fire-fighting foam (AFFF)
- Plastics/non-stick coating manufacturing

COMMON CONTAMINANTS AND SOURCES

Metals

- Electroplating (chromium [III, VI], nickel, zinc)
- Firing ranges (antimony, lead)
- Machining (chromium, vanadium)
- Paint manufacturing (lead)
- Mining, smelting (all)
- Coal combustion powerplants/boiler rooms (arsenic, lead, mercury, vanadium)

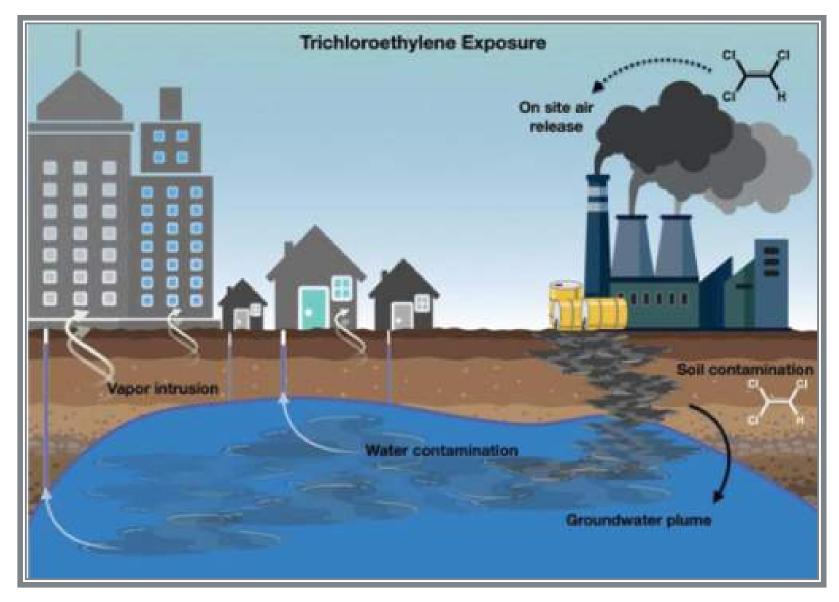
COMMON CONTAMINANTS – FATE & TRANSPORT

Physical Characteristics

- CSM should include physical and chemical factors for each substance being assessed
- Not all contaminants behave similarly in the environment (or at the same site)
- Include known/anticipated contaminant behavior in the environment

Contaminant Characteristics

- Mobility
- Density
- Solubility
- Volatility
- Toxicity
- Persistence
- Bioaccumulation



Source: University of Rochester Medical Center: Common Drycleaning Chemical Linked to Parkinson's Disease

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Questions?