

# NR 724 VAPOR INTRUSION O&M

## Flipping the Switch and Checking the System

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2017

Consultants' Day | April 20 | Pewaukee

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## Key Points

- Protecting people is the goal
- Communication is key
- NOT enough to simply install a vapor mitigation system
- Must ensure that:
  - the system is needed
  - the system works
  - the system will continue to work

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## VI ASSESSMENTS

Q: Are people protected from vapor intrusion?

A:



Wis. Admin. §§ NR  
 716.11  
 722.09  
 724.09 – 724.17  
 725.05  
 726.05 & 726.15

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# VI ASSESSMENTS

Q: Are people protected from vapor intrusion?

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 714.07  
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# PUBLIC OUTREACH

- Access to off-site properties
  - Best faith effort
  - Multiple attempts
  - Multiple approaches
- Outreach Tools
  - Template letters
  - Factsheets (NEW! RR-067)
  - Access agreement examples
  - NEW! Videos

**BEST FAITH EFFORT**

- Mail
  - At least two written letters
  - Final letter from DNR
- Personal Contact
  - Call or in-person
  - Local health assistance

<http://dnr.wi.gov/topic/Brownfields/Vapor.html>

Code Ref: Wis. Admin. §§ NR 714.07 and NR 725.07

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# PUBLIC OUTREACH: VIDEOS

- [Vapor Intrusion 101](#)
- [The Responsible Neighbor](#)



<http://dnr.wi.gov/topic/Brownfields/Vapor.html>

**DNR videos**

Use the list items below. These items are intended to help environmental compliance and responsible parties communicate critical information about the vapor intrusion problem to affected property owners. These videos should be used in conjunction with fact sheets or other documents.

- [Vapor Intrusion 101](#) This video, using a team of communication techniques, addresses the basics of vapor intrusion to provide the public with a better understanding of the risk of vapor intrusion, how it spreads underground, and what can be done about it.
- [The Responsible Neighbor: A Fact Sheet](#) This video for compliance and responsible parties shows how good communication with neighbors benefits everyone involved with an environmental cleanup.

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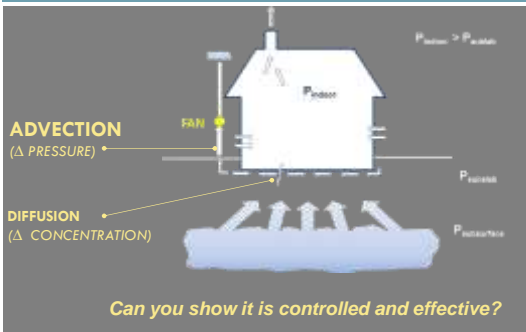
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## SUBLAB DEPRESSURIZATION




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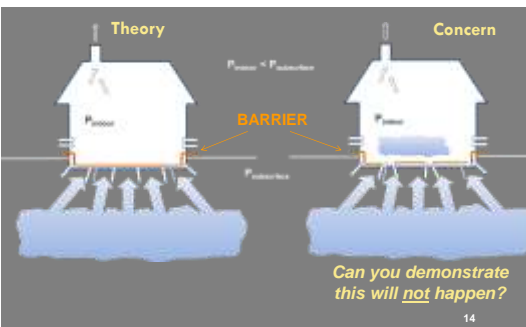
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## PASSIVE CONTROLS




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## OPERATION, MONITORING & MAINTENANCE

- Step 1: Commissioning
  - 6 mos. – 1 yr.
  - Performance Verification
  - Baseline Conditions
- Step 2: Long-term OM&M
  - ~5 yr – indefinitely
  - Monitoring
  - Inspection and Maintenance
  - Contingency
  - Annual submittal of inspection form (potentially)

Verify effectiveness and document as-built conditions

Maintain system and check to confirm it meets baseline condition criteria

Code Ref: Wis. Admin. §§ NR 724.13, NR 724.15, NR 724.17, and NR 725.11(2)

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# OM&M PLANS

- When to implement?
  - Right after commissioning
  - Don't wait until closure
  - Can use as the Closure Maintenance Plan
- Who is user?
  - Before closure = RP
  - After Closure = Property owner
- Make it user friendly
  - Explain why needed and how it works
  - Include pictures
  - Provide clear direction



Code Ref: Wis. Admin. §§ NR 724.13, NR 724.17 and NR 725.11(2)

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# EXAMPLE OM&M PLAN

**EXAMPLE**

Activity	Frequency	Responsible Party	Notes
Visual Inspection	Daily	Operator	Check for leaks, unusual sounds, or odors.
Instrumentation	Weekly	Operator	Verify that all instruments are functioning properly.
Calibration	Monthly	Operator	Calibrate all instruments according to the manufacturer's instructions.
Performance	Quarterly	Operator	Review process performance and adjust as needed.
Documentation	As needed	Operator	Update the OM&M plan with any changes or findings.

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# PRO-ACTIVE PUBLIC OUTREACH

- Good for you...
  - Limit confusion and resistance
  - Create trust
  - Save time
  - Save money
- Good for them...
  - Importance understood
  - Better likelihood to do OM&M
  - Health protected
- DNR & Health available for support



Code Ref: Wis. Admin. §§ NR 714.07 and NR 725.07

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- [The Responsible Neighbor](#)



<http://dnr.wi.gov/topic/Brownfields/Vapor.html>

**DNR videos**

Use the link above. These videos are intended to help environmental compliance and regulatory parties communicate critical information about the vapor intrusion pathway to affected property owners. These videos should be used in conjunction with fact sheets or other documents.

- [Vapor Intrusion 101](#) - This video, using a brief demonstration technique, articulates the concept of vapor intrusion to people who may be unfamiliar with it by showing the real-world, full-scale development and what can be done about it.
- [The Responsible Neighbor - A Good Neighbor Relationship](#) - This video for community and regulatory parties shows how good communication with neighbors benefits everyone involved with an environmental cleanup.

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## Takeaways

- People are the top priority – Talk to them
- No preemptive mitigation
- OM&M is a long-term commitment
- Tools are available: Go to [dnr.wi.gov](http://dnr.wi.gov) & search “vapor”

**NEW RR-800 Guidance is coming soon!**  
**We want your comments.**

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## Vapor Intrusion

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## Questions

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