

Vapor Intrusion

OMB Begins Review of EPA Vapor Intrusion Guidance to Ensure Consistent Cleanup



The White House Office of Management and Budget Sept. 25 began its review of the Environmental Protection Agency's vapor intrusion guidance intended to ensure consistent exposure assessment and mitigation actions at contaminated sites. The guidance consists of two documents—one for all chlorinated compounds and the other for petroleum hydrocarbons released from underground storage tanks, the EPA told Bloomberg BNA Sept. 25.

Vapor intrusion is the migration of volatile chemicals from contaminated soil or groundwater into overlying buildings. At low concentrations in indoor air, the vapors can cause a variety of adverse health effects, such as skin irritation and dizziness, and at high levels they are associated with kidney and liver damage or damage to the nervous system.

The EPA said it developed the documents to provide technical and management guidance to field investigators when they conduct vapor intrusion investigations and response actions.

"OMB's review is the final step in the documents' development process, during which EPA has undertaken extensive stakeholder engagement, including consideration of public comments received in 2011 and 2012," the agency said.

The guidance is of interest to regulators, environmental and engineering consulting firms and buyers, sellers and lenders interested in redeveloping brownfields and other contaminated sites.

2002 Draft Guidance

The EPA has been operating with draft guidance since 2002, along with any technical documents it has issued since then. Because the science on vapor intrusion has changed so quickly, a significantly different draft was released in April 2013 for public comment. Unlike the 2002 draft, the updated guidance included a separate narrower document for petroleum hydrocarbons ([22 EDDG 29, 4/18/13](#)).

Lenny Siegel, executive director of the Center for Public Environmental Oversight in Mountain View, Calif., told Bloomberg BNA, "It's good the guidance is finally moving forward again, but I am concerned that elements of industry will use the more political process at the White House to undermine findings that have been made by the environmental professionals at EPA."

White House Shouldn't Block Guidance

Siegel called on the OMB to ensure all its communications from stakeholders, including representatives of polluters, are made public and that representatives of affected communities have an opportunity to take part in discussions. If the guidance that went to the OMB is "anything like the external review draft, it could enhance the protection of the public in their homes, workplaces, schools and other buildings," he said. "The White House review must not significantly delay adoption of the guidance," Siegel said.

Larry Schnapf, of Schnapf LLC in New York City, told Bloomberg BNA that from a practical standpoint, the vapor intrusion guidance will apply to sites only under EPA supervision or states

that adopt it. Since about 36 states have their own guidance, Schnapf said he is unsure how many sites the guidance actually will affect.

TCE Screening Levels

"The more important issue is going to be if EPA adopts the short-term TCE screening levels being used in regions 9 and 10," he said. "If states have to use those levels and adopt the approach being used in those regions, then vapor intrusion could have significant impacts on site cleanups and redevelopment."

In July, the EPA's Region 9 issued guidance saying interim health protection measures for short-term exposure to TCE in indoor air should be established for California and other areas in the region (23 EDDG 58, 8/21/14). In August, EPA headquarters issued a memo to all regional superfund directors compiling information related to early and interim actions at superfund sites and the TCE Integrated Risk Information System (IRIS) assessment. The memo also provides current information about the toxicity of TCE.

For More Information

The EPA's August memorandum on the TCE IRIS assessment is available at <http://op.bna.com/env.nsf/r?Open=fwhe-9pased>.