WELCOME

THE WEBINAR WILL BEGIN SOON





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Background Check: The Why and How of Background Threshold Values

Wednesday, June 12, 2024



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Presented by:



Kenneth S. Tramm, PhD, PE, PG, CHMM Principal, Modern Geosciences



Melanie Veltman Director, Research and Data, ERIS

Host



Background Check: The Why and How of Background **Threshold Values**



Kenneth S. Tramm, PhD, PE, PG, CHMM June 12, 2024







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A little 'Background'

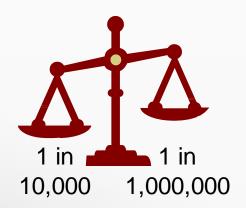
- * Risk-based Corrective Action (RBCA) Refresher
- * Soil Sampling Scenario
- * Statistical Tools & Background **Threshold Value (BTV) Options**
- * State BTV Example (Oklahoma)
- * Regional BTV Example (DFW)

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This presentation includes summary data from the above articles (https://doi.org/10.1002/vzj2.20294). Please refer to the articles for additional detail. Modern Geosciences © 2024

Risk Assessment

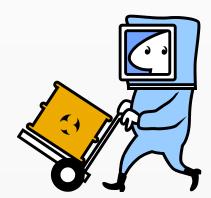
Risk = Toxicity x Exposure



Risk Threshold typically a regulatory standard

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Chemical-specific Properties (URF, RfC, etc.) Concentration at Point of Exposure Rate of Intake (Exposure Frequency, Exposure Duration Assumptions)

Exposure routes Ingestion, dermal contact, water, inhalation of vapors; residential vs. commercial exposure

Risk Based Corrective Action

Risk

Receptor

Source (Release)

• Hazardous material released into the environment

Manage Risk

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- Pathway controlled through institutional or engineering mechanisms
- Ex: Groundwater use limitation or engineered cap

Receptor

- Residential
- Commercial
- Construction worker

Source



- Receptor controlled through use limitation or institutional control
- Ex: Commercial use restriction

Exposure Pathway

Inhalation

Pathway

- Ingestion
- Dermal contact

Manage Risk

- Source controlled through removal or decontamination
- Ex: Source excavation, destruction, attenuation

Risk Based Corrective Action

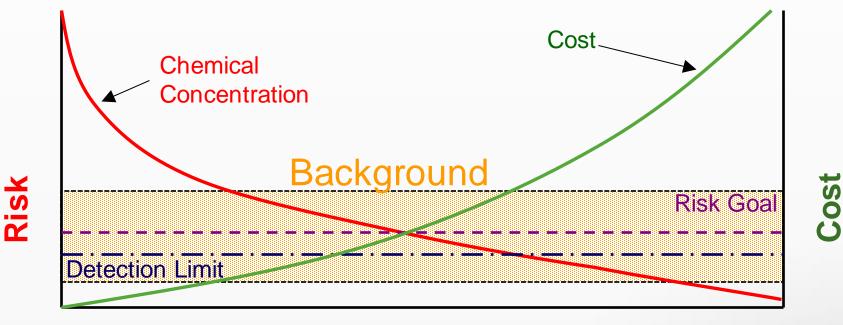




risk-based approach is consistent with the Administrator's offorts to ensure that our environmental lassong programs ar based on the application of sound science and conson memors we finalish and consentitive. BAYs regulations for the UT corrective action program and add provide the to tailor their programs. They

environment. In other words, DFAG regulations allow Estate to make choices shout how they will design and conduct their correctly action groups. OWEN has long exception and accepted the on these general principles. Thet was the ispetime for a directive on corrective action extensioning issued they parts action of the set of the set of the set of the set of the making. These directives are tools that Regional officies can be set of the set of t

As presented in this policy statement, the use of risk-ba decision-making in UWT corrective action programs is conceptua and operationally compatible with the CERCLA remedial and BCRA corrective action programs, EPA's guidance on development of



Site Remediation Process

EPA – "A risk-based approach is consistent with the Administrator's efforts to ensure that our environmental cleanup programs are based on the application of **sound science** and **common sense** and are **flexible** and **cost-effective**." March 1995 (OSWER Directive 9610.17)

RBCA 101 Risk Criteria

Two basic frameworks:

VIODERN

1- EPA: Soil Screening Guidance (1996+)

- Based on Risk Assessment Guidance for Superfund (RAGS; 1989+)
- Generic Risk-Based Soil Screening Level (SSL) Formulas/Assumptions
- Today: Expanded to EPA Regional Screening Levels (RSLs)

2- ASTM: Risk-Based Corrective Action (1994+)

- ES-38-94 (1994), E1739 Petroleum (1995-2024), E2081 All Compounds (2000+)
- Default Tier 1 risk-based Formulas/Assumptions for screening (RBSLs)
- Site-specific Tier 2 (assumptions) or Tier 3 (update formula/model/other)
- Today: State-based program use of Tiered framework incorporating EPA SSL elements/EPA Guidance

Background

Both approaches mention the importance of
background values, but do not provide them or
formal approaches to developing "background."

ACT Designation: E 2081 - 00

Standard Guide for Risk-Based Corrective Action

Office of Solid Waste and Publication 9355.4-23 Emergency Response July 1996

Emergency Response Washington, DC 20460

♣EPA Soil Screening Guidance: **User's Guide**

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RBCA 101

Risk Criteria

<u>Lowest</u> of all exposure model values[‡]; published values by County, State or EPA (RSLs)

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Background

Upper limit of expected background for the area being assessed. Some states offer values for point comparison – most do not

Screening value is the higher of the Risk Criteria or Background value.

[‡] Soil exposure models most commonly include soil-to-groundwater, inhalation of volatiles, dermal contact, and ingestion pathways. These are back calculated based on acceptable levels of carcinogenic (10⁻⁶) and non-carcinogenic risk (0.1).

Why do we need Background?

Example Scenario:

- You perform soil sampling to evaluate for a suspected regional lead concern.
- Take 5 samples of shallow soil and analyze for lead
- Get back results. Lead ranges from 22 to 27 mg/Kg.
- Do you have a release?





14

Why do we need Background?

Example Scenario:

Risk Criteria

Background

Screening Value

- You perform soil sampling to evaluate for a suspected regional lead concern.
- Tal Soil Screening Guidance: lyze for lead
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7440-47-3

16065-83-1

18540-29-9

7439-92-1

57-12-5

Ge Technical Background to 27 mg/Kg.

Do Document EPA 1996 "EPA regions should use a residential soil lead

Chromium (total)

Chromium (III)

Chromium (VI)

Lead

Cyanide (amenable)

Inorganics RSL of 200 parts per million (ppm)" – EPA 2024

APPENDIX A

Generic SSLs

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<u>CAS No.</u> <u>7440-36-</u> <u>7440-38-</u> <u>7440-39-</u> <u>7440-41-</u> <u>7440-41-</u> <u>7440-43-</u> highly mobile." - EPA 1994

390

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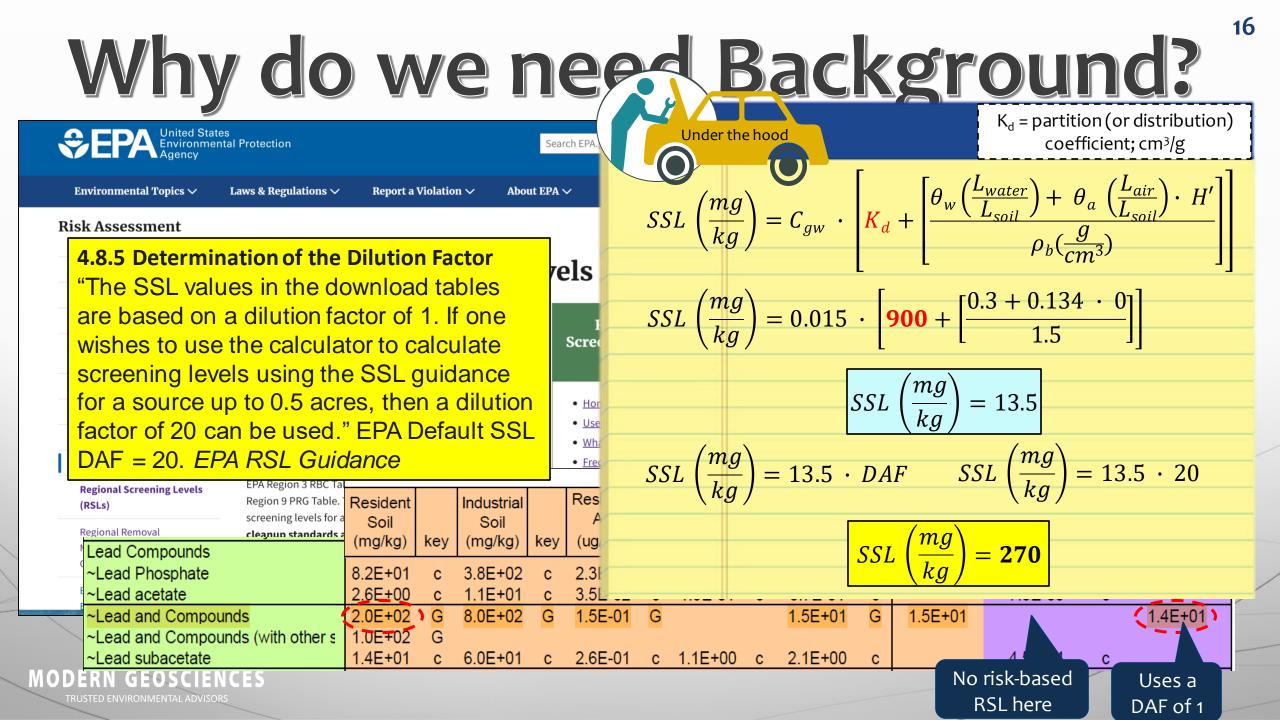
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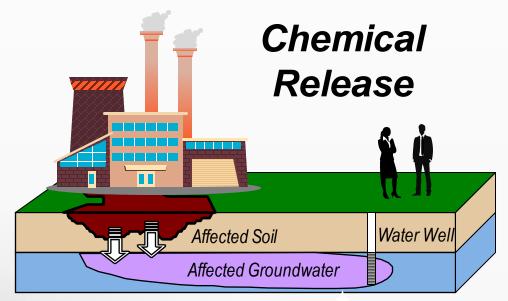
^k A screening level of 400 mg/kg has been set for lead based on *Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities* (U.S. EPA, 1994).

270

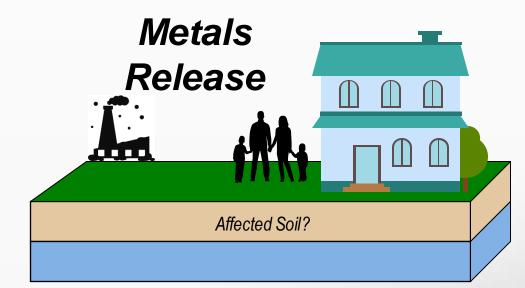
270 ^e



Source Size?



Are results > Risk Criteria or Background? (Not naturally occurring – no Background)



Are results > Risk Criteria or Background? (Need [REALISTIC] Background)

Knowing Background informs when a release is suspected – or how large a source (release) may actually be.

Back to work...

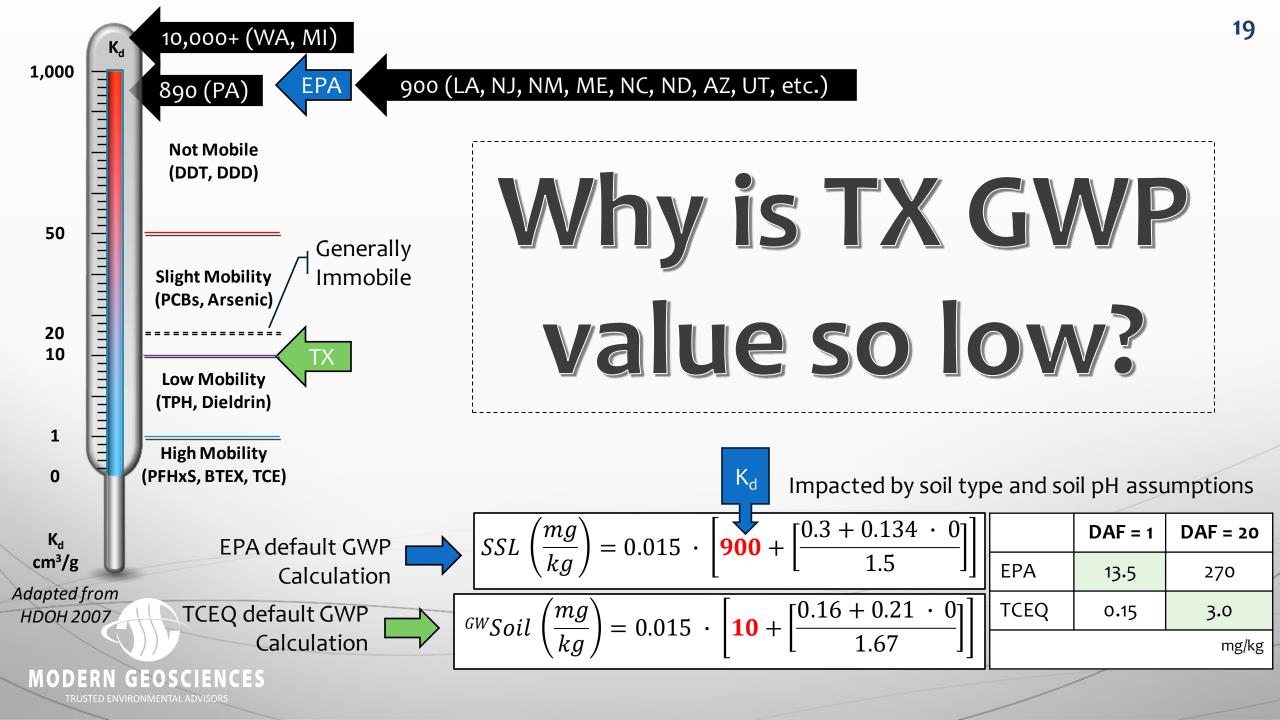
Example Scenario:

- You perform soil sampling to evaluate for a suspected regional lead emissions/release.
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- Do you have a release?

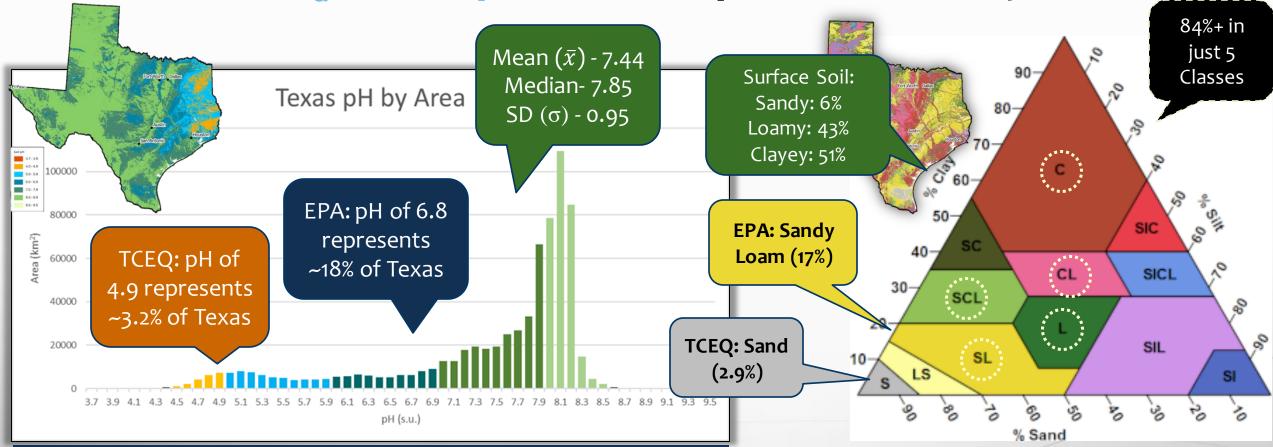


	EPA RSLa	PAb	TX ^c	HId					
Risk Criteria	GWP = 14 (270), HH = 200	GWP = 450, HH = 500	GWP = 3.0, HH = 500	GWP = BT, HH = 200					
Background	None	None	Median of 15	BTV of 73					
Screening Value	14 or (200?)	450	15	73					
All concentrations in mg/kg; GWP = soil-to-groundwater value; HH = human health value									

- a EPA RSL Calculator [CR of 10-6; NCR = 0.1]; May 2024
- b PADEP MSCs [CR of 10-5; NCR = 1]; Note: the CSSAB references 2013 USGS data– July 2022
- c TCEQ TRRP (§350) assuming source is <0.5 acre (Tier 1 PCL) [CR of 10-5; NCR = 1]; Apr 2024 and Texasspecific Soil Background Concentrations (TSSBCs)
- d Hawaii EALs; BT= Batch Testing on a "site-by-site basis and discussed with HIDOH where necessary."



Texas K_d Assumptions: Soil pH = 4.9; Sandy Soil



Why important? At pH >7 lead "exponentially less likely to leach to groundwater vs below pH of 7." (ORNL-5786; 1984): EPA- "At pH values above 6, lead is either adsorbed on clay surfaces or forms lead carbonate." (EPA 1992; 540/S-92/018); NRCS - Clayey soil has higher Cation Exchange Capacity (a measure of the soil's ability to hold positively charged ions) – less leaching potential (i.e., Pb+2)

USDA Soil Survey Manual (Agriculture Handbook No. 18); 2018

R<u>eference</u>: Walkinshaw, Mike, A.T. O'Geen, D.E. Beaudette. "Soil Properties." California Soil Resource Lab, 1 Oct. 2022, casoilresource.lawr.ucdavis.edu/soil-properties/. https://casoilresource.lawr.ucdavis.edu/soilweb-apps/

Is the TX Background

value too low?

1981: Up to **119 samples**.

Texas Sources:

USGS Data Series 801 available here: <u>https://mrdata.usgs.gov/ds-801/</u>

1981 USGS Dataset* TSSBC uses the median value from this **119 sample dataset** (all at 20cm depth)

2013 USGS Dataset

More comprehensive data now exists to allow better state and localized regional background estimates.

2013 USGS effort

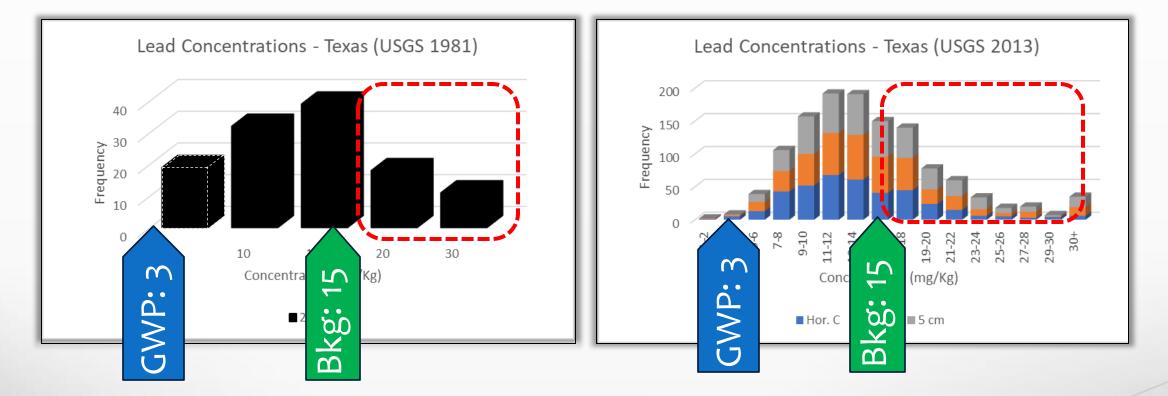
Extensive QA/QC and No samples collected:
1) within 200 m of a major highway;
2) within 50 m of a rural road;
3) within 100 m of a building or structure; &
4) within 5 km downwind of industrial activities such as power plants or smelters.

2013: Number of Texas observations (n = 433). Up to 3 samples at intervals from surface to 3.3 feet below grade.

Up to 1,237 samples.

* TSSBC incorrectly cites USGS PP 574-F from 1975

1981 vs. 2013 – Visualizing False Positives



Yes. A median "Background" is too low.

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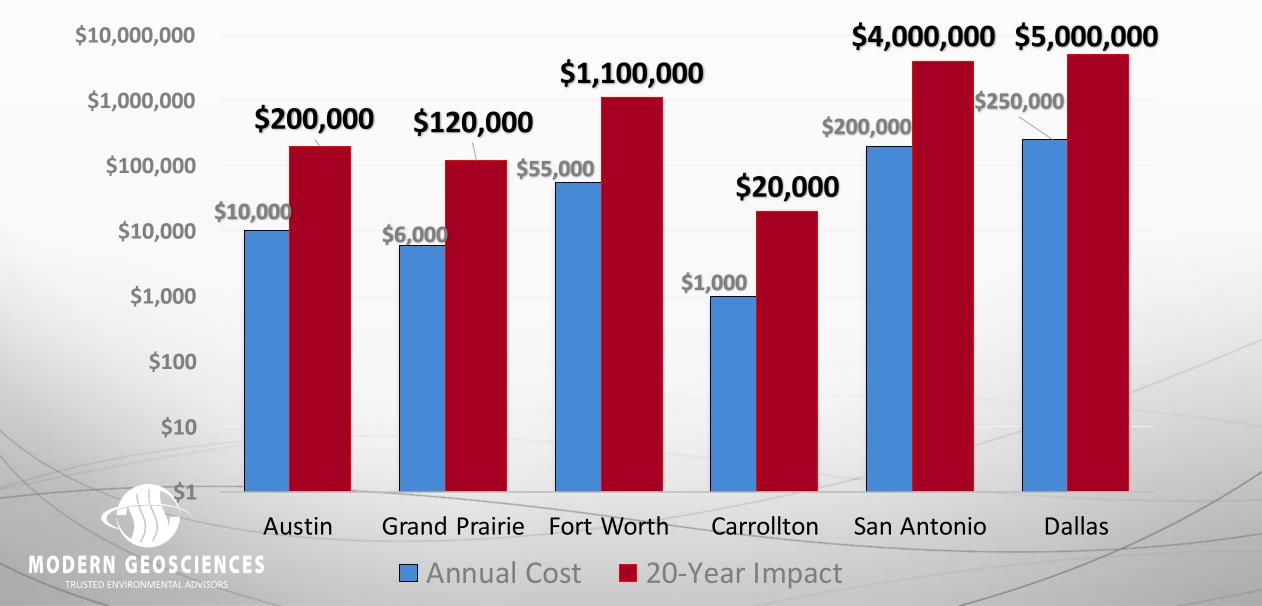
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Note: 1981 Lead SDL was 10 mg/Kg. Histogram includes 19 NDs as ½ SDL.

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False Positive – Municipal Impact



Is there a better way to represent Background?

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EPA's thoughts...

"Spatial variability of soil is not an academic question. It is a real landscape attribute; our unwillingness or inability to identify it in no way decreases its magnitude or existence.... As scientists we must document the magnitude and form of soil variability; accommodate its existence in models of soils; and transmit accurately the expected pattern and implication of spatial changes to users of soil resources. Soils are not material specific; many soil **properties are not single valued**, many are transient, and many are not randomly distributed but rather systematically time and **spatially dependent.** The dilemma is that soils are not isotropic media but rather they are strongly anisotropic laterally and vertically."

-Larry Wilding (Texas A&M; 1976-2003)

EPA/600/R-92 😌 EPA Preparation of Soil Sampling **Protocols: Sampling Techniques and Strategies**

EPA 1992 (EPA/600/R-92/128) Wilding, L. P. 1985

Background Threshold Value

Where do we get

"background?"

- ITRC: BTV = A single value used to represent soil background (easier to use in screening).
- EPA: The BTV is "representing an upper threshold of the background population..." BTVs "should be estimated by statistics representing the dominant background population represented by the majority of the data set."

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Solid Waste and PB94-963313 EPA/540/F-94/030 Environmental Protection **Establishing Background Levels** \$ EPA In some cases, published background levels may exist that can be applied to a specific site. The following published data sources may be consulted: • Background sample results from other nearby **CERCIA** site investigations · Local surveys by other Federal or State agencies (e,g., U.S. Geological Survey (USGS), Soil Conservation Service (SCS)) • University studies Tables or databases with natural concentration ranges and averages in local or regional soils (OSWER Directive 9345.1-05) · EPA 1995 (EPA/540/F-94/030)

Interstate Technology Regulatory Council (ITRC)
 2022 (Soil Background and Risk Assessment)
 EPA 2022 (ProUCL 5.2 User Guide; 5.1 Technical Guide)

Statistical Tools

Parameter

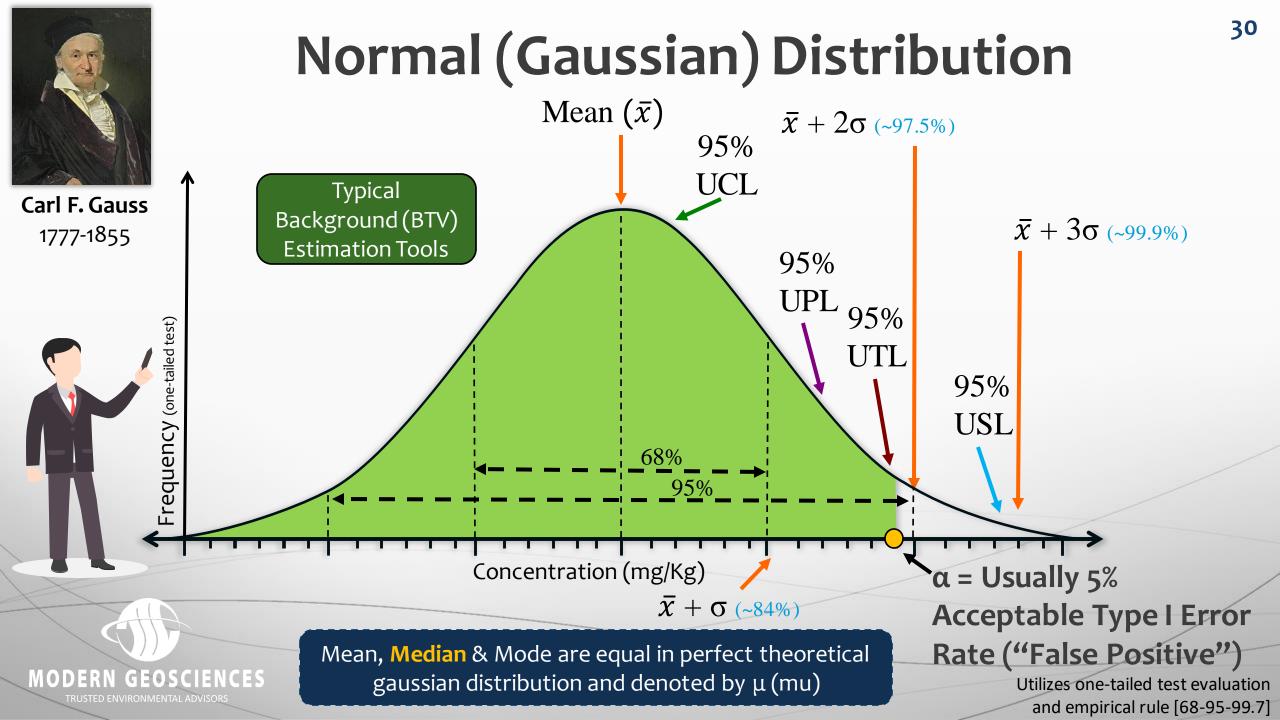
Mean (\bar{x}) $\bar{x} = \frac{\sum_{i=1}^{n} x_i}{n}$	Arithmetic average; a measure of central tendency Note: For right skewed distribution Mean > Median.
Median (M) $M = \frac{x(\frac{n+1}{2})}{2}M = \frac{x(\frac{n}{2}) + x(\frac{n}{2})}{2}$ n is odd n is even	Middle observation of the distribution; 50th percentile; 1) half of data are above and Below. Not influenced by extremes of contaminant distribution. Measure of central tendency.
Mode	The value that occurs most often in the distribution; a measure of central tendency
Standard Deviation (σ) $\sigma = \sqrt{\frac{\sum_{i=1}^{n} (x_i - \bar{x})}{n-1}}$	an estimate of the degree of variability within a distribution, indicating how much the values typically vary from the average value or mean
Coefficient of Variance (CV) $CV = \frac{\sigma}{\bar{x}}$	provides a quick and useful indication of the relative degree of variability within a data set.
Relative Percent $ RPD = \frac{(\bar{x} - M)}{\left\lfloor \frac{\bar{x} + M}{2} \right\rfloor} \cdot 100$ Difference (RPD)	Relative difference between the mean and median. EPA – "If the mean is approximately equal to the median, then the data are distributed symmetrically." 10% RPD goal.

Statistical Tools

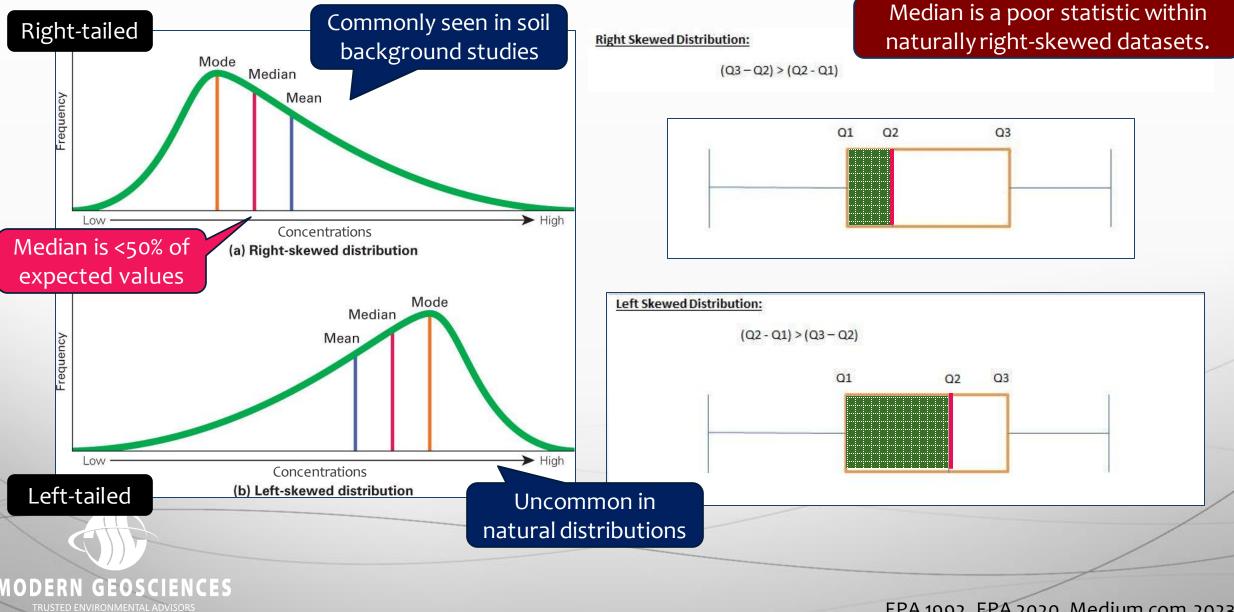
Confidence Limits

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Upper Confidence Limit (UCL): 95% UCL = $\bar{x} + [t \cdot \left(\frac{\sigma}{\sqrt{n}}\right)]$	The upper boundary (or limit) of a confidence interval of a parameter of interest such as the population mean. Not suggested for use in evaluating background values.
Upper Prediction Limit (UPL): 95% UPL = $\bar{x} + [t \cdot \sigma \cdot \sqrt{1 + \frac{1}{n}}]$	The upper boundary of a prediction interval for an independently obtained observation (or an independent future observation).
Upper Tolerance Limit (UTL) 95% $UTL = \bar{x} + (k \cdot \sigma)$	A confidence limit on a percentile of the population rather than a confidence limit on the mean. In other words, a 95% UTL with coverage coefficient 95% represents a 95% UCL for the 95th percentile.
Upper Simultaneous Limit (USL): 95% $USL = \bar{x} + \sigma \cdot d_{2a}^{b}$	The upper boundary of the largest value within a specified level of confidence. Only applied when no outliers are suspected in the dataset.
	EPA 2020 and ITRC 2022



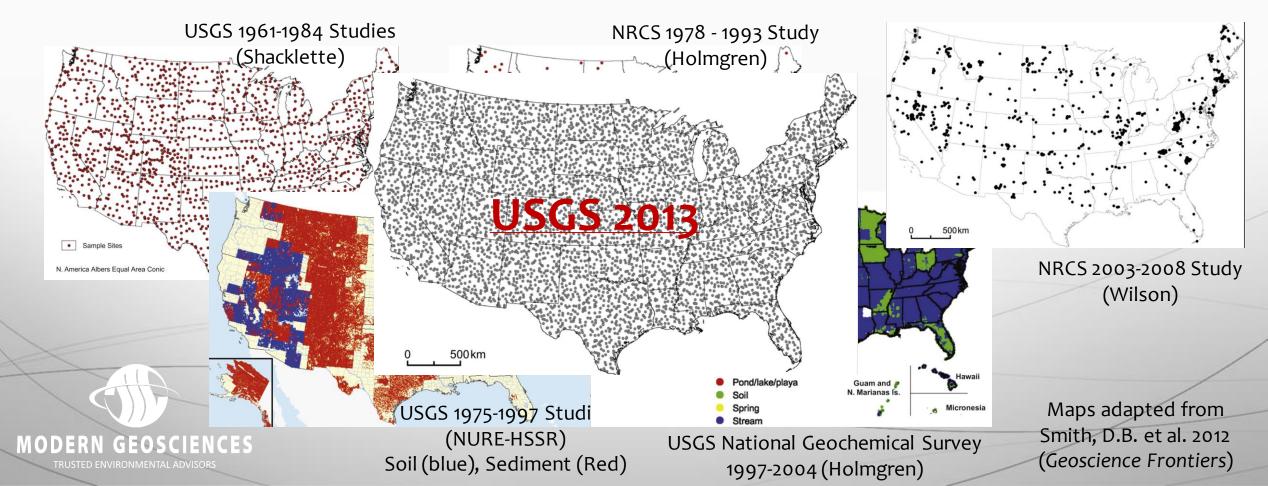
Real World Distributions



EPA 1992, EPA 2020, Medium.com 2023

What Data?

- * 1-Local data always preferred but rarely available for general screening.
- * 2-State/Local agency data next most preferred
- * 3-USGS or similar best alternative if you do not have Local/State data



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Which BTV Estimator?

We proposed three key criteria:

- * CV of dataset
- * R (correlation) of the Q-Q Plot

EPA & States commonly use a CV ≤1 for acceptance of UPL or UTL. This new approach adds more requirements before consideration of any BTV Estimator.

* Relative Percent Difference (RPD) between Mean and Median (for USL use)

Table 1: BTV Estimator Selection								
BTV Estimator	Description	Minimum Sample Set	Normality Performance Goals					
UPL	Most Conservative, Least Inclusive	8	• R of $\geq 0.7 $ and CV of ≤ 1.0					
UTL	Moderately Conservative, Moderately Inclusive	8	• R of $\geq 0.85 $ and CV of ≤ 0.85					
USL	Least Conservative, Most Inclusive	20	• R of $\geq 0.95 $ and CV of ≤ 0.5 • RPD of \bar{x} and M $\leq 10\%$					

ENCES <u>Note</u>: utilize ½ of the detection limit for non-detected samples – up to 15% of dataset. Beyond this, other statistical methods would apply – and require regulatory concurrence.

Example: Oklahoma USGS Data

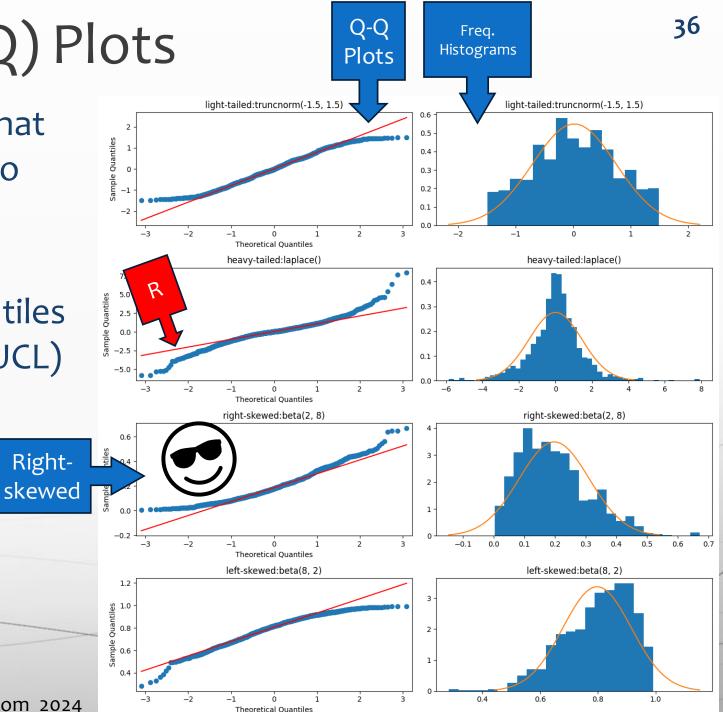
Oklahoma							Step 1: Select data (USGS	S No.	801)
	Lead								
Censoring	None	<10) <50	<45	<30		Step 2: Process within EP	roUCL and	
n	333 <	331	329	325	316		review the BTV output (a	t left)
Min	5.3	T a	otal Number o				Number of Distinct Observations	164	
IVIIII	5.5	~		Minimu			First Quartile	10.9	_
Max	122	-5	S	econd Larg			Median	13.4	
Mean	16.09	1.		Maximu Me			Third Quartile	17.4 10.87	nd R
	10.09			ent of Variat			SD	5.42	
Median	13.40	1.3		of logged D			SD of logged Data	0.432	
RPD	18.24	1/							
			e	ian					
std d	10.870	7.	elerance Fact	or K (For U⁻	FL) 1.79		d2max (for USL)	3.582	
CV	0.676	0.		TV meeting					
		0	Shaniro Will	Normal GOF Test Wilk Test Statistic 0.595 Normal GOF Test				i v meeting	
R	0.748	0.		o Wilk P Va		,	Data Not Normal at 1% Significance Level		/
BTV Estim	ators			s Test Statis		3	Lilliefors GOF Test		
050/LIDI	24.05	20	1% Lilliefors	Critical Va	lue 0.056	6	Data Not Normal at 1% Significance Level		
95%UPL	34.05	28		Data I	Not Normal a	at 1% Signi	ficance Level		tatistics be
95%UTL	35.55	29	Background Statistics Assuming Normal Distribution						
95%USL				d without low					
9370USL	55.03	4, 95	% UTL with				90% Percentile (z)	30.02 33.97	L 5.1TG
				95% UPL 95% US			95% Percentile (z) 99% Percentile (z)	41.38	
	CCLENC			0070 00				1.00	
DDERN GEO	SCIENC	E S							2013 USGS Data

Example: Oklahoma USGS Data

Oklahoma									Step 1: Select data (USGS	S No.	801)
	Lead								Stop 2. Procoss within EF	$\Delta^{\prime} c D$	roll(land
Censoring	None	<]	00	<50	<45	<30)		Step 2: Process within EF	ASP	I OUCL and
n	333	3	31	320	325	316			review the BTV output (a	t left)
		5	Tota	I Number of	f Observatic				Number of Distinct Observations	164	
Min	5.3	2			Minimu		.3		First Quartile	10.9	
Max	122	5		S	econd Large				Median	13.4	
Mean	16.09	15			Maximu Me		2 6.09		Third Quartile SD	17.4 10.87	nd R
		15		Coefficie	ent of Variati		.676		Skewness	5.42	
Median	13.40	13			of logged Da		.664		SD of logged Data	0.432	
RPD	18.24	14							hold Values (BTVs)		
		7	T - 1 -		lan						
std d	10.870	/.		erance Facto	or K (For UI	L) 1	.79		d2max (for USL)	3.582	-
CV	0.676	0.4			TV meeting						
R	0.748	0	, c	Shapiro Will	Test Statis	tic 0	.595		Normal GOF Test	- 0	
		0.			o Wilk P Val				Data Not Normal at 1% Significance Level		
BTV Estim	ators				s Test Statis		.203		Lilliefors GOF Test		
95%UPL	34.05	28	-	1% Lilliefors			0566	(O' - ' C	Data Not Normal at 1% Significance Level icance Level		
					tatistics be						
95%UTL	35.55	29	Background Statistics Assuming Normal Distribution							d without low	
95%USL	55.03	42	95%	UTL with	-		5.55		90% Percentile (z)	30.02	
<u> </u>					95% UPL	(t) 34	4.05		95% Percentile (z)	33.97	L 5.1TG
//					95% US	SL 55	5.03		99% Percentile (z)	41.38	
DERN GEO		ES					All co	oncei	ntrations in mg/kg		2013 USGS Data

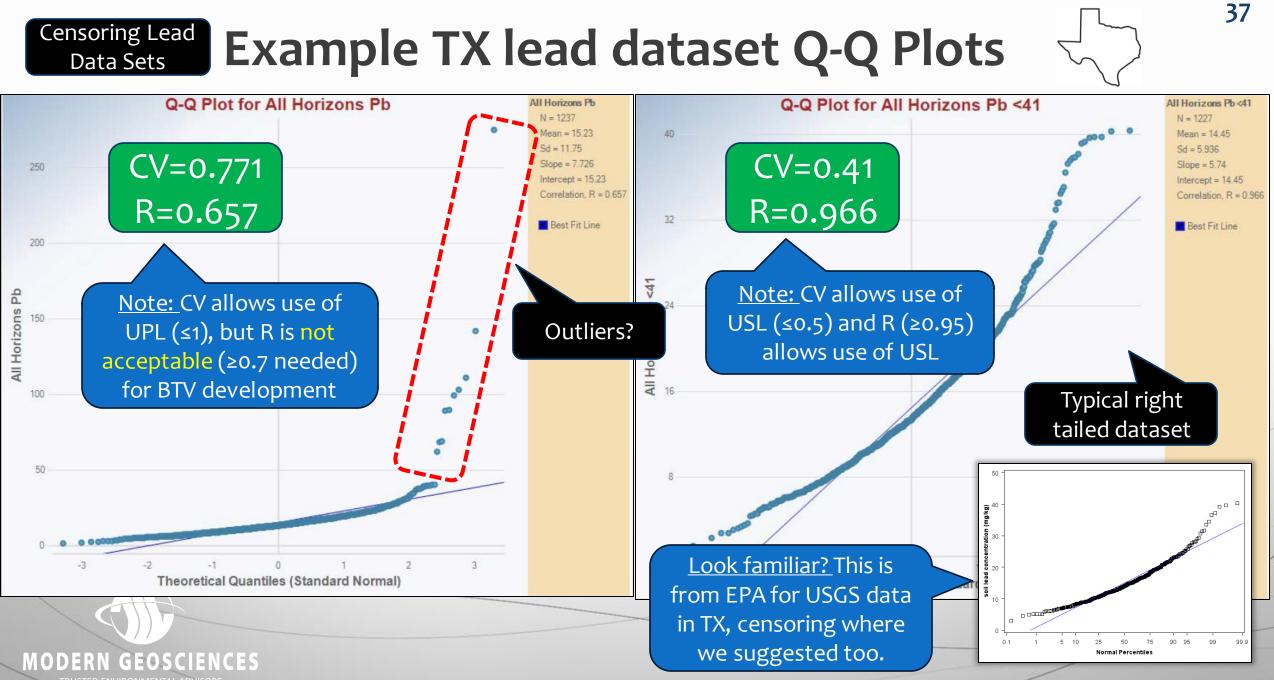
Quantile-Quantile (Q-Q) Plots

- D plot of theoretical quantiles that serves as an "exploratory" tool to understand possible outliers and data distributions
- X-axis presents percentiles/quantiles of the distribution (6 bins in ProUCL)
- Y-axis presents measured concentrations
- Breaks and jumps can suggest subpopulations or outliers

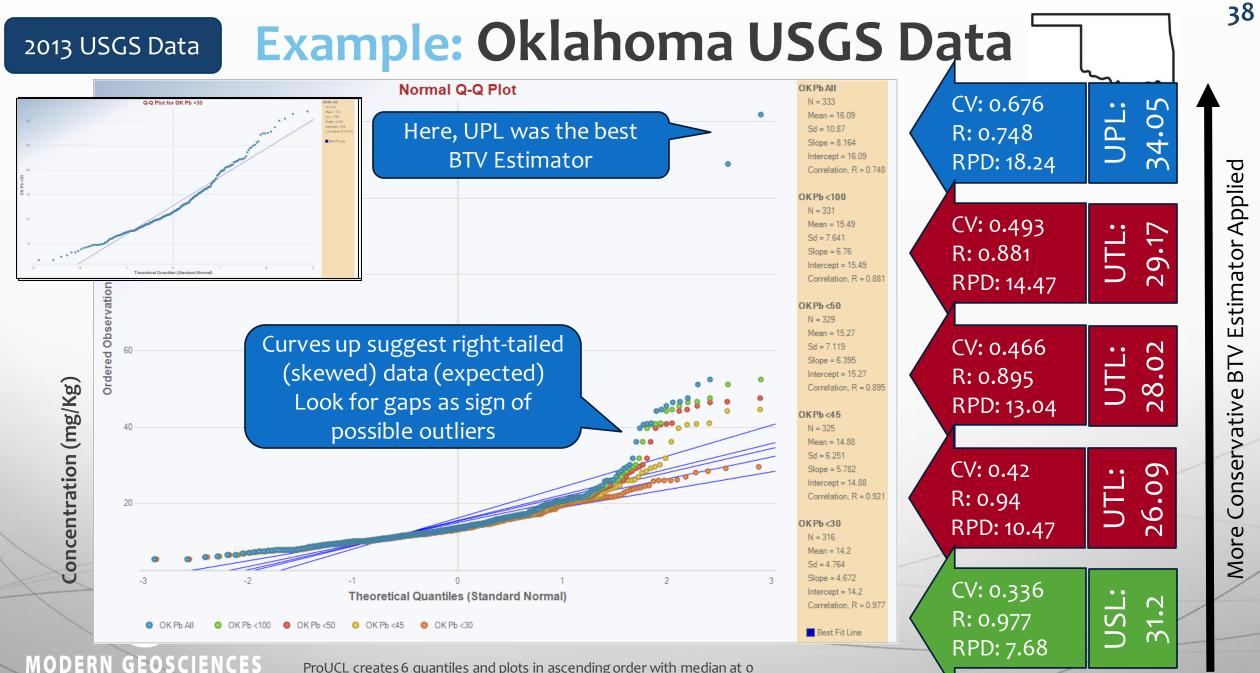


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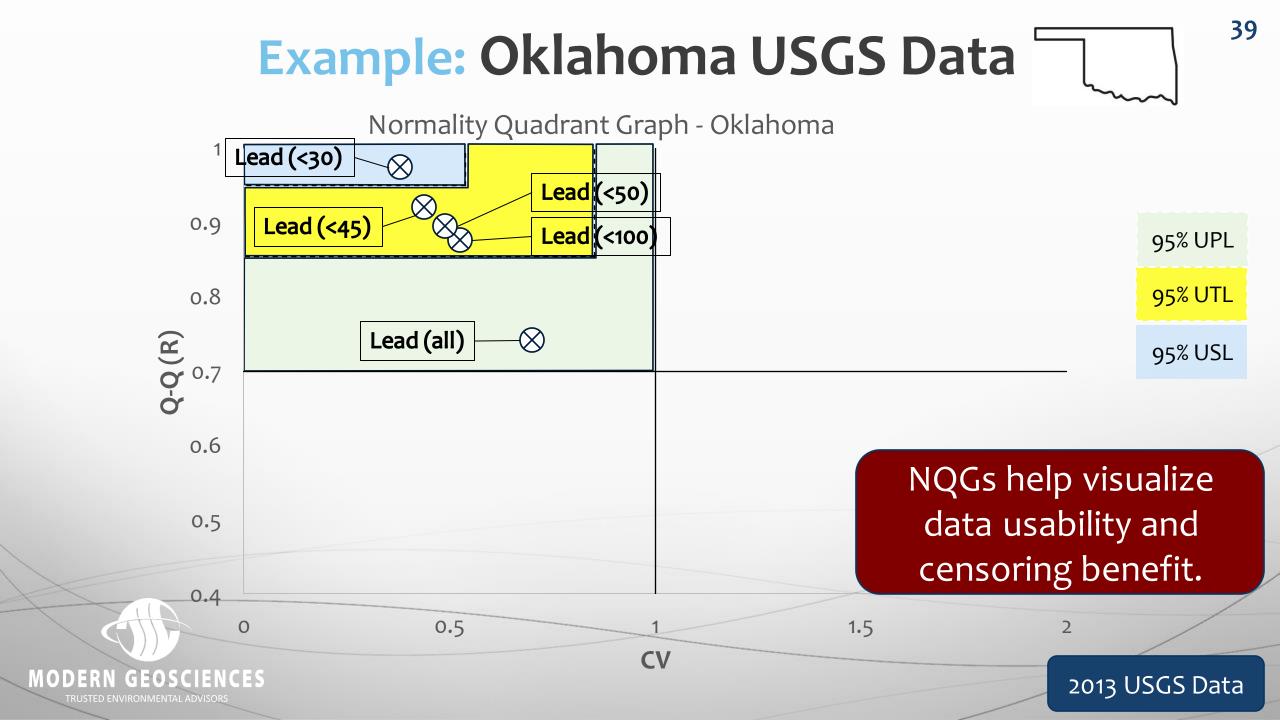
Right-

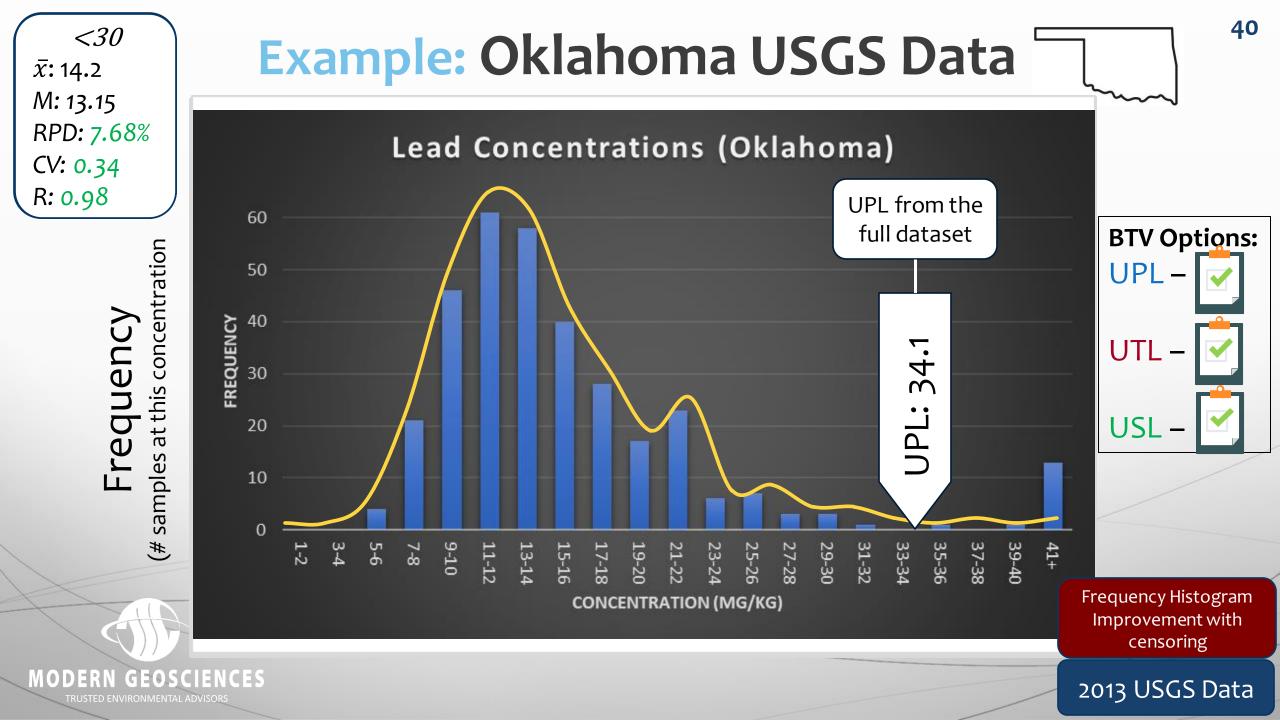


https://www.epa.gov/superfund/usgs-background-soil-lead-survey-state-data

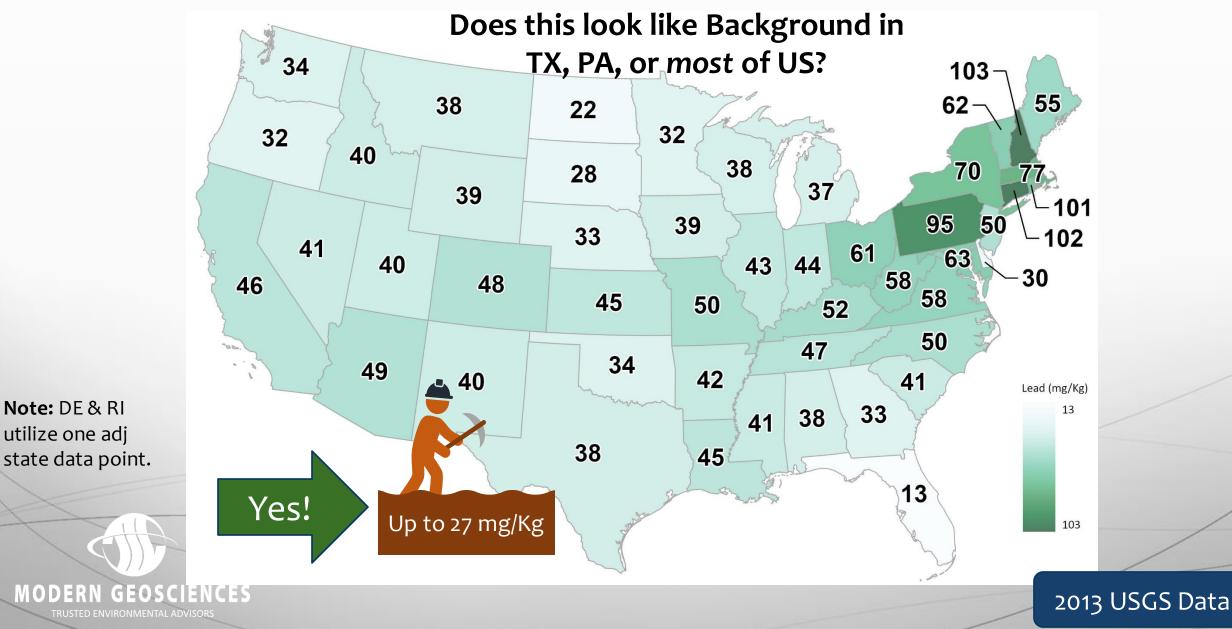


ProUCL creates 6 quantiles and plots in ascending order with median at o





Conterminous US: Lead BTVs



Note: DE & RI

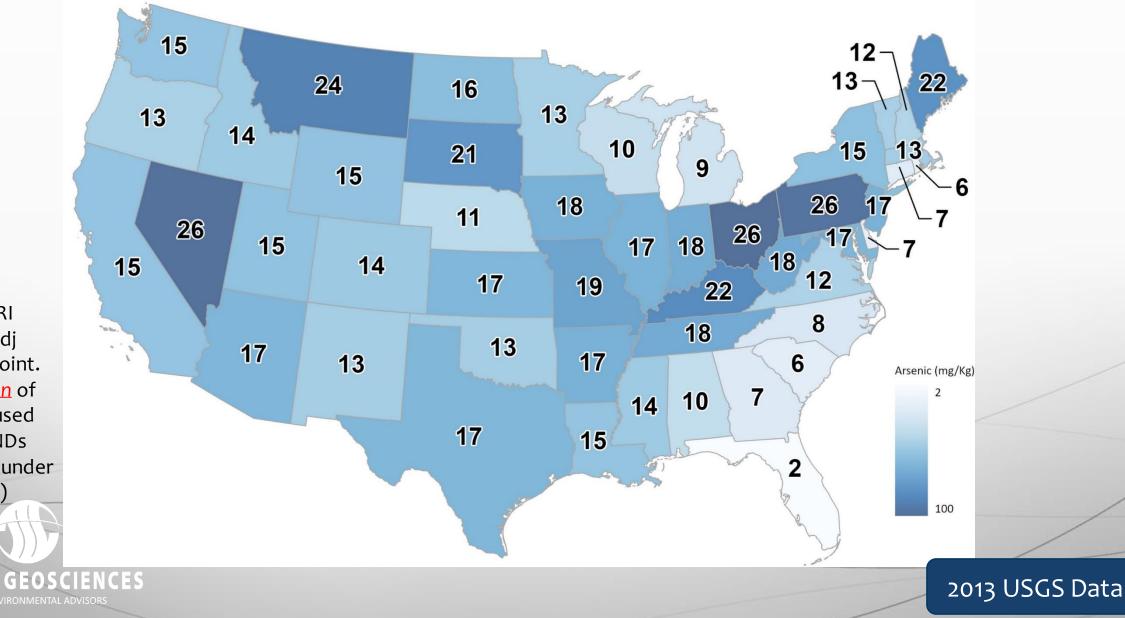
utilize one adj

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Conterminous US: Arsenic BTVs



Note: DE & RI utilize one adj state data point. Florida: *mean* of detections used (too many NDs for BTV est. under this method)

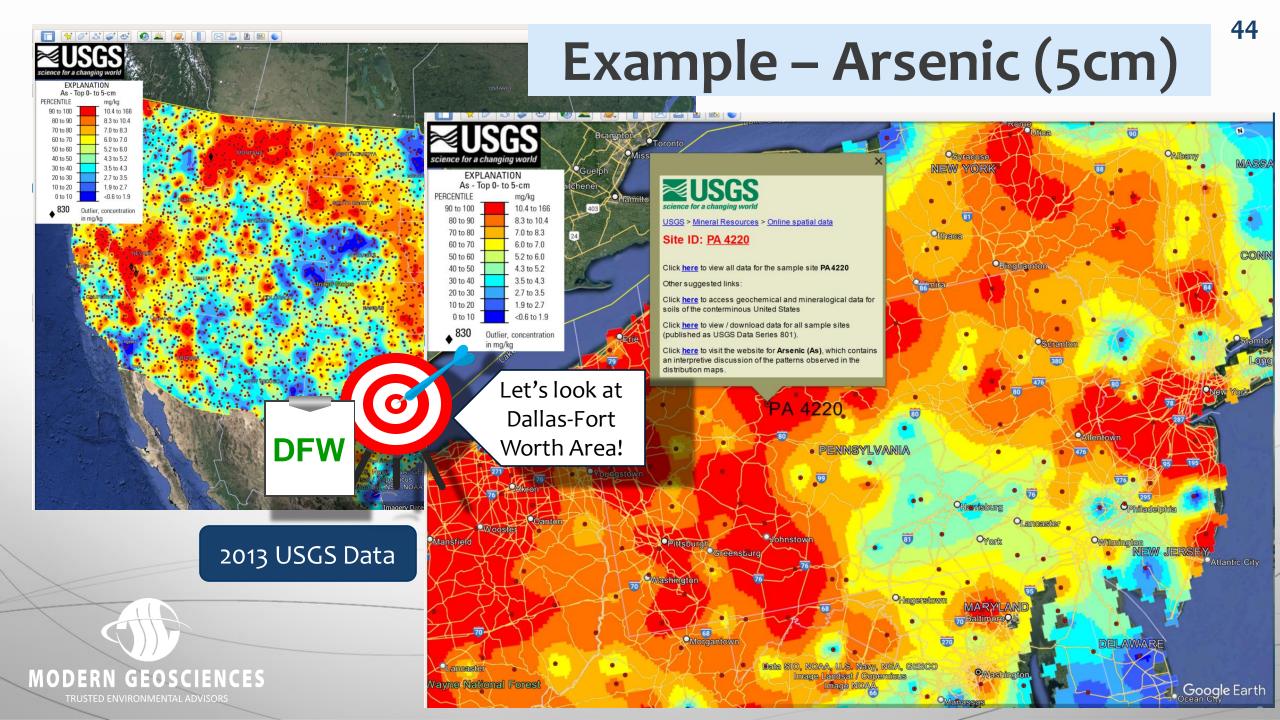
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How about data for regional areas?

Note: Because of analysis method differences for USGS Data, we suggest mean value for Aluminum and 95% UCL for Barium, Chromium, and Vanadium – if EPA Methods required for risk assessment. Expect Mercury to be biased low.

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You bet ! – try to keep your dataset ≥20 samples; 40+ even better – be aware of parent material changes

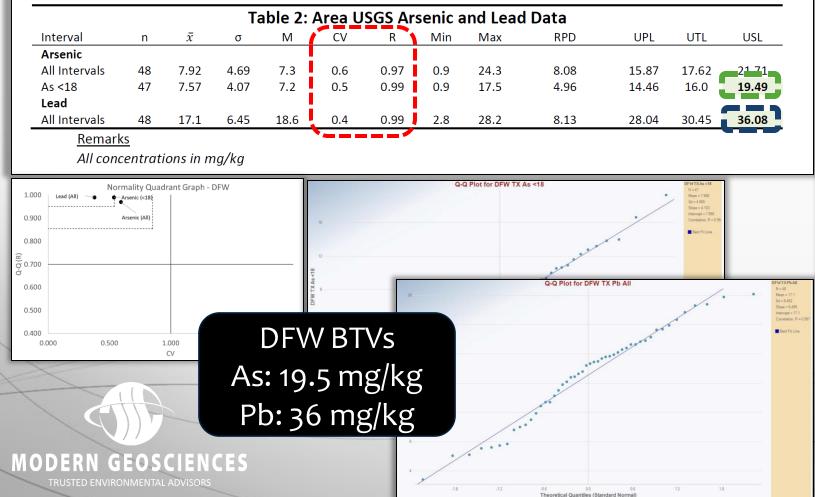


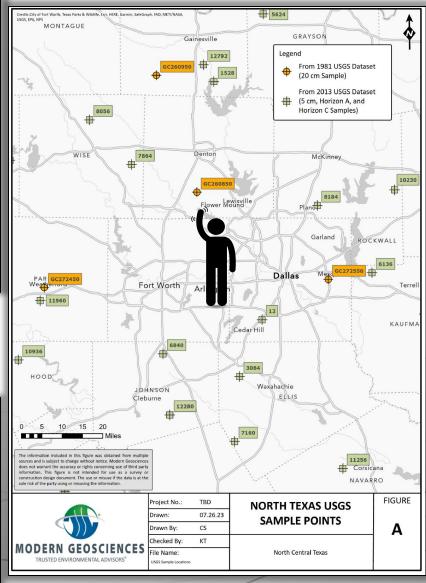
Example: DFW Area

STATISTICS AND BTV RESULTS

2013 USGS Data

Modern utilized BTV methodology consistent with multiple TCEQ precedents and published guidance for defensible data within this area of Texas consistent with 30 TAC §350.51(I). Below are the statistics for the selected soil sample data sets.





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Modern 2024



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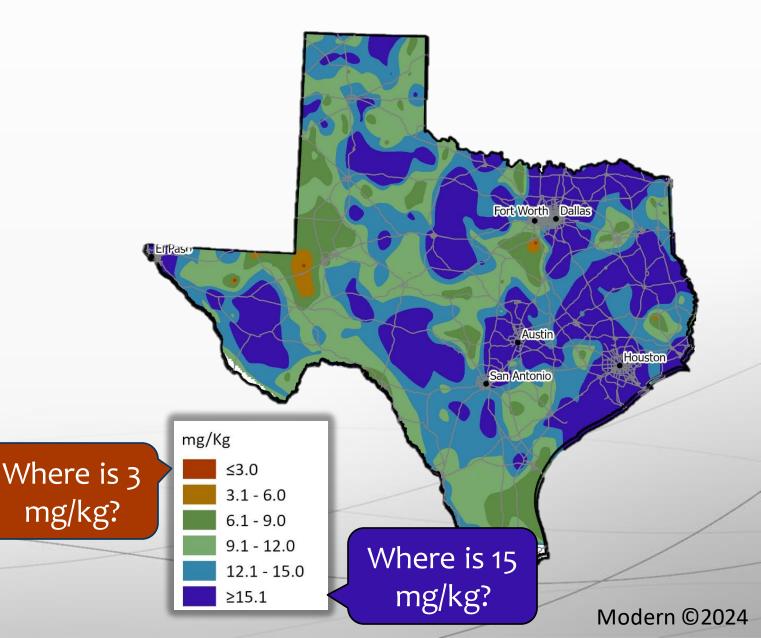
2013 USGS Data Set – Lead Concentrations

All Dark Blue exceeding Texas' Background value

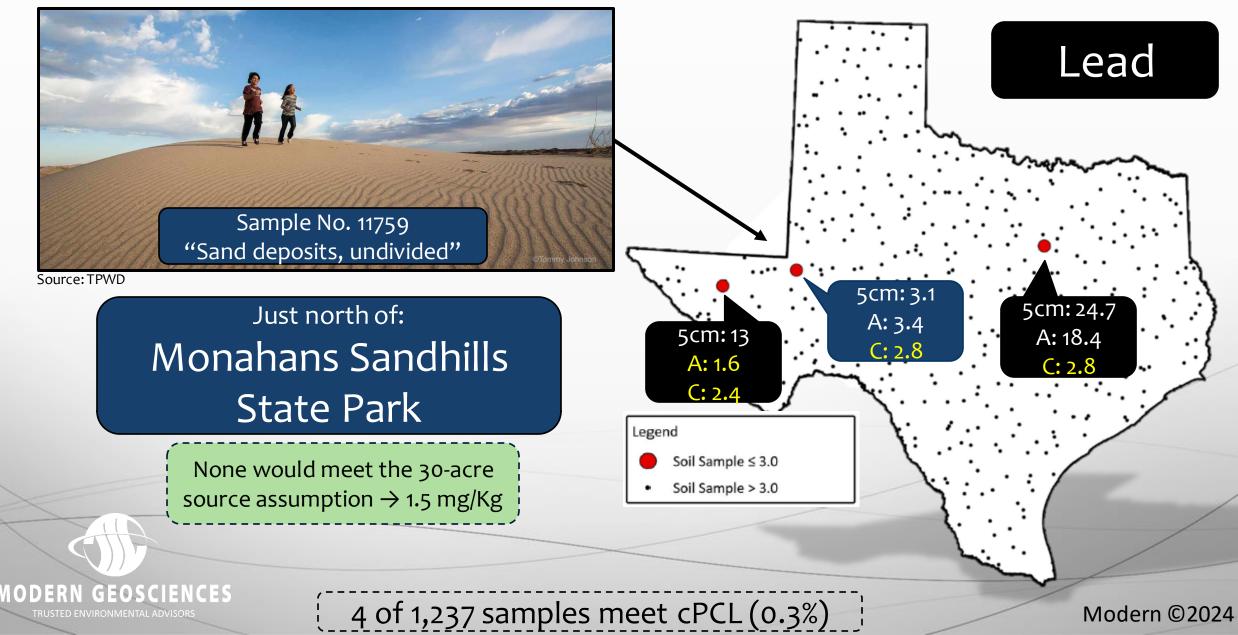
5 cm	o samples ≤ 3 mg/kg
Α	1 sample ≤ 3 mg/kg
C	3 samples ≤ 3 mg/kg

Near 100% False Positive (Type I Error) rate expected in several regions

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2013 USGS Data Set – Where is cPCL (3 mg/kg) met?



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QUESTIONS?











THANK YOU





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