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### **Evaluating the Soil to Water Line Pathway in Tier 3**

Tier 2 rules, guidance, and software currently do not allow for consideration of vertical separation in the evaluation of the soil to water line receptor pathway. An actual water line receptor is considered high risk at Tier 2 if it is located within ten feet of the soil plume defined to the applicable Tier 1 level. However, if a water line is identified as high risk in Tier 2 for soil, it might be further evaluated in Tier 3 to determine if a soil contamination plume greater than the target level is located within 10 feet of the water line in horizontal, vertical, or diagonal directions.

A Tier 3 Work Plan which intends to document separation for this receptor pathway must include horizontal and vertical delineation of the appropriate soil plumes based upon laboratory analyses. PID readings alone from the boring logs would not be sufficient to determine contaminant concentrations, but PID readings could provide supplemental data. Analytical results from multiple soil samples in a given borehole would likely be necessary to show vertical delineation of the plume.

The data must be presented in a Tier 3 Report which provides a sound and comprehensive analysis of the data compiled to demonstrate separation. A comprehensive presentation would include, but is not limited to, properly prepared boring logs, cross section diagrams showing the location of the contaminant plumes relative to the water line receptor, and contoured soil plume maps from the Tier 2 software on a site map.

If the Tier 3 can document the soil contamination plume with concentrations above applicable target level is not within 10 feet of any part of the referenced water line(s) in horizontal, vertical, or diagonal directions, then the water line may be considered no action required for the soil pathway.

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