Questions Regarding Vapor Intrusion

- Do I Have to Use the Guidance?
- Which Numbers Do I Use?
- Can I Use the OSHA Exemption?
- Aren’t the Sampling Requirements Onerous?
- How Does it Impact My Redevelopment?
- How am I Going to Pay for It?
2013 VI Guidance
Do I Have to Use This?

NO!

- Alternate Approaches Can be Proposed
- Written from Closure Perspective
- Not even SOPs
What is the Deal with the Numbers?

Part 201 & 213
Generic Volatilization to Indoor Air Criteria
- Groundwater – GVIIC
- Soil – SVIIC

2013 VI Guidance Screening Levels
- Groundwater
- Soil Gas
- Soil
Can I Still Use GVIIC and SVIIC?

- **YES!** When Appropriate for Your Site Conditions

- **When NOT Appropriate:**
  - A Site Specific Approach is Needed
  - Not One “Right” Way to do This
  - “Can” Use VI Guidance Screening Levels as a Site Specific Approach
Can I Use the OSHA Exemption?

- Yes, IF:
  - Facility classified as Manufacturing (SIC code);
  - Complies with the MIOSHA; &
  - Air monitoring and hazard communication program account for all hazardous substances of concern
Do I Need Multiple Rounds of Sampling?

Collecting Quality Data:

- Location of Samples Relative to Structure and RECs
- Use of Proper Sampling Techniques
- Use of a Conceptual Site Model (CSM)
- Understand what the Data Means or Hire Someone Who Does
Characterize Your RECs

Can you assume no VI?
Use a CSM!
How Does All of This Impact My Redevelopment Plans?

- Need to Evaluate the Risk for VI
- Need Enough Data to Make the Evaluation
- Data is More About Quality than Quantity*

*Reliable data possible in as little as 1 event
Investigate vs. Presumptively Mitigate

Extra time & cost required for investigation

vs.

Cost to presumptively mitigate the site
Typical Presumptive Remedy

Liner and Passive Ventilation
Typical Presumptive Remedy

Active/Sub Slab Depressurization System

Vapors are directed away from building by the depressurization system.

Soil

Plume

Groundwater
VI and Brownfield Redevelopment
Not Mutually Exclusive!

The Garage - Northville
VI and Brownfield Redevelopment
Not Mutually Exclusive!
VI and Brownfield Redevelopment
Not Mutually Exclusive!

St Anne - East Lansing
VI and Brownfield Redevelopment Not Mutually Exclusive!
VI and Brownfield Redevelopment
Not Mutually Exclusive!

Arbor Hills Crossing - Ann Arbor
VI and Brownfield Redevelopment
Not Mutually Exclusive!

Abercrombie Construction - Southgate
Available DEQ Brownfield Funding

Grants
Loans
Brownfield TIF
Available DEQ Brownfield Funding

What is Eligible?

ENVIRONMENTAL ACTIVITIES!

- Investigations
- Mitigation Systems
- Etc.
Available DEQ Brownfield Funding

How Do I Qualify?
Brownfield Funding Considerations

- Applicant a LUG
- Contaminated Property
- Redevelopment
- Liability Issues
- Environmental!!!
Brownfield Funding - Grants

Up to $1 Million
Brownfield Funding - Loans

- Up to $1 Million
- 15-Year Term
- First 5-Years Payment/Interest Free
- 1.5% Interest Rate
Brownfield Funding – Act 381 TIF

TIF = Tax Increment Financing

Act 381 Established Ability to use TIF to reimburse developer for eligible Brownfield Activities
Brownfield Funding – Act 381 TIF

The Increment: How TIF Works

Pre-Development

Base Taxable Value of Property Established

Base Taxable Value

$
Brownfield Funding – Act 381 TIF

The Increment: How TIF Works

Developer Makes Improvements

Value of Property Increases

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Base Taxable Value $

New Taxable Value $$$
Brownfield Funding – Act 381 TIF

The Increment: How TIF Works

Increment = (New – Base)

Incremental Increase in Taxable Value $$$
Base Taxable Value $
New Taxable Value $$$
Brownfield Funding – Act 381 TIF

The Increment: How TIF Works

- Taxes on Increment Captured
- Paid to Developer
- Often Used with DEQ Loans

<table>
<thead>
<tr>
<th>Incremental Increase in Taxable Value</th>
<th>$</th>
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</thead>
<tbody>
<tr>
<td>Base Taxable Value</td>
<td>$</td>
</tr>
<tr>
<td>New Taxable Value</td>
<td>$$$</td>
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</tbody>
</table>
Takeaways - Brownfields and VI

Property transactions ARE possible with VI!
Takeaways - Brownfields and VI

Many sites with VI related activities qualify for Brownfield Incentives
Takeaways - Brownfields and VI

Need to **Understand** the Site!

- Quality of Data
- CSM
Takeaways - Brownfields and VI

There are **Many** Paths...

DEQ VI Guidance is just one of them!

*It is **NOT** Required!!!*
DEQ Brownfield Contacts

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Rick Snyder, Governor • Dan Wyant, Director
July 2013
QUESTIONS?

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