



LISTENING SESSION -
Model Remedies for
Sites with Petroleum Impacts
to Groundwater

Toxics Cleanup Program
Department of Ecology
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Background

- ◎ Last August, Ecology held a listening session to obtain external feedback on the scope of the groundwater model remedies document.
- ◎ Numerous recommendations were received. Some had direct applicability to development of groundwater model remedies while others were more broadly focused.
- ◎ Ecology considered a number of these comments during preparation of the draft guidance document.

Background

- ◎ The groundwater model remedies document was released for public comment on May 26th and comments are due June 28th.
- ◎ Ecology intends to incorporate/address the comments received and finalize the guidance document by August, 2016.
- ◎ A report assessing the status of developing model remedies is due to the Governor and Legislature by November 1, 2016.

Purpose of the Listening Sessions

- ◎ To provide participants with the opportunity to ask questions and provide feedback on the groundwater model remedies document.
- ◎ If time permits, Ecology is also interested in discussing next steps. In particular:
 1. Should we develop additional model remedies for other types of contaminants or should we focus on addressing additional comments provided last August?
 2. Are there changes that could be made to the soil model remedies document to make it more useful?

Model Remedy Selection Criteria

- ⊙ Past decisions formed the basis for developing the model remedy options that are being proposed.
- ⊙ The primary remedy must consist of source removal (free product plus contaminated soil) and can be combined with any of the following:
 1. Soil vapor extraction,
 2. Groundwater removal and treatment,
 3. Air sparging,
 4. Chemical/biological treatment, or
 5. Natural attenuation

Model Remedy Eligibility Criteria

- ◎ Model remedies are to be used for routine cleanups at lower risk sites.
- ◎ To be eligible to use a model remedy the draft guidance specifies the site must:
 1. Not be impacting surface water, sediments or any water supply wells.
 2. Be limited to petroleum contaminants, except where the hazardous constituents meet the definition of natural background.
 3. Qualify for an exemption or be eligible to complete a simplified terrestrial ecological evaluation.

Model Remedy Development

- ◎ The draft guidance proposes 12 model remedy options that can be used.
- ◎ The responsibility for selecting the appropriate remedy for a site rests with the PLP's and their consultants.
- ◎ Justification that the selected remedy meets the definition of “permanent to the maximum extent practicable” is not required.
- ◎ When an NFA request is submitted, the focus will be on whether adequate compliance monitoring has been completed to document that the specified cleanup standards have been met.