

Groundwater CU Stds Outline & Issues

WAC 173-340-720 General considerations for establishing groundwater cleanup standards.

- Non-potable criteria—TDS, yield

WAC 173-340-721 Method A groundwater cleanup standards.

- Criteria for use of Method A
- How to factor in vapors

WAC 173-340-722 Method B cleanup standards for potable groundwater.

- Eliminate MCLGs as an ARAR
- Eliminate “standard” and “modified” Method B terminology
- How to factor in vapors

WAC 173-340-723 Method B cleanup standards for nonpotable groundwater.

- No major changes/issues

WAC 173-340-724 Method C groundwater cleanup standards.

- Should we eliminate Method C for groundwater?

WAC 173-340-725 Adjustments to groundwater cleanup levels.

- Assessment of degradation by-products & secondary impacts

WAC 173-340-726 Groundwater point of compliance.

- Combine “adjacent to” and “near” surface water POCs

WAC 173-340-727 Demonstrating compliance with groundwater cleanup standards.

- Filtering—allow it or not? If so, under what conditions?
- Use of no-purge sampling methods
- Add direct comparison method similar to 1995 guidance (2 samples ND or 4 Q samples below CUL)
- Number of years of samples required for statistical tests
- Add non-parametric statistical methods target percentile
- Adjustment for groundwater dilution (primarily tidal areas)
- Handling of non-detects

Table 720-1

- Handling of TPH mixtures

NOTE: Further changes would be necessary to include adjustments for lifetime cumulative exposure and children’s sensitivity to carcinogens.

Soil Cleanup Standards Outline & Issues

WAC 173-340-7400 General considerations for establishing soil cleanup standards.

- No major changes/issues

WAC 173-340-7401 Method A soil cleanup standards for unrestricted land use.

- Criteria for use of Method A
- How to factor in vapors

WAC 173-340-7402 Method B soil cleanup standards for unrestricted land use.

- Eliminate “standard” and “modified” Method B terminology
- Require concurrent ingestion plus dermal for direct contact
- Use of IEUBK for lead
- How to factor in vapors

WAC 173-340-7451 Method A industrial soil cleanup standards.

- Criteria for use of Method A
- How to factor in vapors

WAC 173-340-7452 Method C industrial soil cleanup standards.

- Same issues as Method B, plus
- Use of Adult lead model

WAC 173-340-7460 Adjustments to cleanup levels.

- No major changes/policy issues

WAC 173-340-7461 Point of compliance.

- No major changes/policy issues

WAC 173-340-7462 Compliance monitoring.

- Should we specify an exposure unit (lot size)?
- Add non-parametric statistical methods target percentile
- Handling of non-detects

Tables 740-1 & 745-1

- Addition of simplified TEE screening values to table
- Handling of TPH mixtures

WAC 173-340-747

- Add pH method; foc sampling location language
- Koc's & temp adjusted Henry's constants added to table 747-1
- # of soil samples needed for fractionated TPH analyses
- Timing of empirical demonstrations

NOTE: Further changes would be necessary to include adjustments for lifetime cumulative exposure and children's sensitivity to carcinogens.

Proposed Structure for Use of Method A

WAC 173-340-721 Method A groundwater cleanup standards.

(1) Applicability. Can be used at sites with few hazardous substances and where all of the following conditions are met:

- (a) Numeric standards are available in Table 720-1 or applicable state and federal laws for all indicator hazardous substances at the site; and
 - (b) Hazardous substances are unlikely to reach surface water
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WAC 173-340-731 Method A surface water cleanup levels.

- No Method A surface water cleanup levels
 - Use Method B or C, as appropriate, to establish surface water cleanup levels
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WAC 173-340-7401 Method A soil cleanup levels for unrestricted land use.

(1) Applicability. Can be used at sites with few hazardous substances and where all of the following conditions are met:

- (a) Numeric standards are available in Table 740-1 or applicable state and federal laws for all indicator hazardous substances at the site;
 - (b) The site qualifies for either:
 - (i) An exclusion from conducting a terrestrial ecological evaluation; or
 - (ii) A simplified terrestrial ecological evaluation; and
 - (c) Hazardous substances are unlikely to reach surface water
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WAC 173-340-7451 Method A industrial soil cleanup levels.

(1) Applicability. Can be used only at industrial property with few hazardous substances and where all of the following conditions are met:

- (a) Numeric standards are available in Table 740-1 or applicable state and federal laws for all indicator hazardous substances at the site;
 - (b) The site qualifies for either:
 - (i) An exclusion from conducting a terrestrial ecological evaluation; or
 - (ii) A simplified terrestrial ecological evaluation; and
 - (c) Hazardous substances are unlikely to reach surface water
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WAC 173-340-751 Method A air cleanup levels.

- No Method A air cleanup levels
- Use Method B or C, as appropriate, to establish air cleanup levels