

Draft Revisions to the MTCA Method A Groundwater Cleanup Levels Questions for MTCA/SMS Advisory Group

Arsenic

Ecology is considering raising the Method A ground water cleanup level for arsenic from 5 ug/L to 10 ug/L to reflect the current state and federal drinking water standard and more recent evaluations of background concentrations.

- Do you believe this is an appropriate change given EPA's ongoing reassessment of arsenic toxicity and the potential implications for future revisions to the federal drinking water standards?
- What are some of the practical implications of this revision in terms of cleanup actions and restoration time frames?

Benzo[a]pyrene

Ecology is considering lowering the Method A ground water cleanup level for benzo[a]pyrene from 0.1 ug/L to 0.02 ug/L based on federal risk assessment guidance and analytical feasibility.

- Do you believe this is an appropriate change given current scientific information and federal guidance on early life stage exposures?
- The draft value for benzo[a]pyrene is equal to the PQL for Method 8270C (Selective Ion Monitoring (SIM)). Is this PQL consistent with your experience at cleanup sites in Washington?
- What are some of the practical implications of this revision in terms of cleanup actions and restoration time frames? Do you have ideas on ways that Ecology can evaluate these options when preparing the environmental impact analysis and economic evaluations?

Chromium

Ecology is considering removing the current Method A ground water cleanup level for total chromium (50 ug/L) and replacing it with separate cleanup levels for chromium III (100 ug/L). We are also evaluating different options for chromium VI.

- Do you believe this is an appropriate change given current scientific information and state and federal guidance?
- Chromium VI can be reduced to chromium III under certain environmental conditions. How often is chromium VI a cleanup issue at sites you are involved with?
- What are some of the practical implications of this revision in terms of cleanup actions and restoration time frames? Do you have ideas on ways that Ecology can evaluate these options when preparing the environmental impact analysis and economic evaluations?

Ethylene dibromide (EDB)

Ecology is considering raising the Method A ground water cleanup level for EDB from 0.01 ug/L to 0.05 ug/L to reflect more recent EPA cancer assessments and the current state and federal drinking water standard for EDB.

- Are there reasons why Ecology should not consider making this change?

Naphthalene

Ecology is considering lowering the Method A ground water cleanup level for naphthalene to reflect recent scientific on carcinogenic risks.

- Are there reasons why Ecology should not consider revising the Method A cleanup level for naphthalene?
- Are there other options that Ecology should consider when deciding how to address this issue?
- What are some of the practical implications of this revision in terms of cleanup actions and restoration time frames? Do you have ideas on ways that Ecology can evaluate these options when preparing the environmental impact analysis and economic evaluations?
- Does it make sense to you for Ecology to consider establishing action levels (that consider natural biodegradation) and/or model remedies to support implementation of a revised cleanup level? If so, are there examples that you believe Ecology should consider?

Polycyclic Aromatic Hydrocarbons (PAH) Mixtures/Other Carcinogenic PAHs

Ecology is considering revising the PAH mixtures policy reflected in the 2007 rule amendments because part of the rationale for that policy was compensating for early-life exposure risks.

- Given that Ecology is proposing to apply the EPA early life exposure adjustments to PAHs, do you believe it is appropriate to revise the 2007 policy to specify that cleanup levels for other carcinogenic PAHs should be based on 0.02 ug TEQ/L (for each PAH compound) instead of applying the 0.02 ug TEQ/L to the whole mixture?
- What factors should Ecology consider when making a final decision on this policy revision?
- What are some of the practical implications of this revision in terms of cleanup actions and restoration times?

Cleanup Levels for Other Hazardous Substances

Ecology plans to maintain many of the current Method A values.

- Is there information that you believe Ecology should consider/reconsider to support revisions to one or more of those values?