

Use of Method A

Pete Kmet, P.E.
Department of Ecology
Toxics Cleanup Program
(360) 407-7199
pkme461@ecy.wa.gov

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Method A - Current Framework

- Intended for **Simple Sites**
- Table Values don't consider:
 - Surface water impacts
 - Terrestrial ecological risk (evaluated separately)
 - Vapor hazards
 - Additive risk (except TPH)
- Can also use ARARs (some $>10^{-6}$ risk) and PQL/natural background for chemicals not in table



Method A - Proposed Framework

	Current MTCA Rule	Proposed MTCA Rule
Groundwater	Table & ARARs	Table & ARARs
Surface water	ARARs	None (use Method B)
Soil	Table & ARARs	Table & ARARs
Air	None (use Method B)	None (use Method B)
Sediments	None (use WAC 173-204)	None (use WAC 173-204)



Method A Groundwater

- Criteria for Use -

	Current MTCA Rule	Proposed MTCA Rule
# of Substances	"Few" hazardous substances	"Few" hazardous substances
Routine sites	<ul style="list-style-type: none"> •CUL obvious & undisputed •Proven method of cleanup •No EIS •TEE exclusion or simple TEE 	Eliminated
Source of cleanup level	Table or ARARs or if none; use PQL/Natural Bkgd	Table or ARARs or if none; use PQL/Natural Bkgd
S. Water Impacts	Not addressed	Can't use if "likely to reach surface water"

NOTE: Vapors still to be determined.



Method A Soil

- Criteria for Use -

	Current MTCA Rule	Proposed MTCA Rule
# of Substances	"Few" hazardous substances	"Few" hazardous substances
Routine sites	<ul style="list-style-type: none"> •CUL obvious & undisputed •Proven method of cleanup •No EIS •TEE exclusion or simple TEE 	TEE exclusion or simple TEE
Source of cleanup level	Table or ARARs or if none; use PQL/Natural Bkgd	Table or ARARs or if none; use PQL/Natural Bkgd
S. Water Impacts	Not addressed	Can't use if "likely to reach surface water"

NOTE: Vapors still to be determined.



Use of Method A Focus Questions

- Do you concur Method A should be focused on groundwater and soil?
- Since additive risk is not considered under Method A, should we continue to allow use of ARARs not in the tables (potential to exceed 10^{-5} total risk)?
- Are there criteria that should be added or removed to limit/expand the use of Method A?



Thank You!

-Discussion-



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