



"Dale Bridgford"

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To <gwtf@emsus.com>

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Subject Attn: Kenneth Lovelace - RE DNAPL Discussion Paper

Comments on the May 10, 2004 EPA Discussion Paper "Cleanup Goals Appropriate for DNAPL Source Zones.

Since this is a discussion paper, it is my understanding that its purpose is to attempt to cover the positions of all stakeholders. Based upon the positions presented and comments received during the comment period, further evaluation of the issue will be conducted, perhaps resulting in new policies, guidance, etc. at some later date. The following are my comments on the paper:

1. While alternative cleanup goals are discussed, the paper seems to return to the apparent one to one correlation of source removal and attainment of Maximum Contaminant Levels (MCLs) in the groundwater. It may be Technically Infeasible to achieve MCLs in the source area groundwater, yet still be worthwhile to remove/remediate the source area as it would enhance the likelihood of achieving MCLs at the property boundary. In Option 2, this point is discussed briefly, but the Disadvantages section notes that it "Would only apply to sites where the DNAPL source zone has been delineated, which may be a small minority of sites." Aren't facilities still obligated to delineate their sources? If they aren't, then they ought to delineate the source when they have groundwater going offsite at concentrations above the appropriate regulatory criteria.
2. EPA should also recognize that there are other criteria that may be applicable besides just MCLs. In Michigan, for example, we have a fully developed suite of risk based criteria for other pathways which Region V has signed a Memorandum of Understanding (MOU) which allows them to be applied both by Michigan and EPA (please see [http://www.deq.state.mi.us/documents/deq-wmd-hwp-EPA-WMD\\_mou.pdf](http://www.deq.state.mi.us/documents/deq-wmd-hwp-EPA-WMD_mou.pdf) for a copy of the MOU). These criteria include consideration for groundwater/surface water interface (GSI) where groundwater is venting to a surface water body, indoor air/vapor intrusion, direct contact, etc. (please see [http://www.michigan.gov/deq/0,1607,7-135-3311\\_4109\\_9846---,00.html](http://www.michigan.gov/deq/0,1607,7-135-3311_4109_9846---,00.html) for these criteria, the administrative rules and supporting operational memorandum).

Thank you for the opportunity to provide comments on this document.

Sincerely,

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