



"Richard E. Jackson"

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To <gwtf@emsus.com>

cc

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Subject Comments on "Cleanup goals appropriate for DNAPL Source Zones"

Re: Problem Statement nr. 2: As a technology developer, I agree that specifying MCL as the target is inhibiting the development of new methods. It should be remembered that engineering designs failed in the past [bridges, highways, dams etc], but that didn't inhibit engineers from trying again and improving the designs. This learning-by-doing is unheard of in DNAPL remediation these days. As the engineering writer Henry Petroski [himself a prof of structural engineering at Duke] has said in so many words: engineers learn by trying, failing and correcting. EPA has created an environment that inhibits progress in this manner, and don't think we're going to solve this problem without a few failures.

Re Options: I recommend the following:

Option 4: explain existing policy and urge DNAPL remediation "to the extent practicable" as is stated in the TI guidance document. Remember: CERCLA said to reduce the toxicity, mobility and volume of wastes. Congress voted on that and it is the Law. EPA should uphold the law and not facilitate its avoidance.

Option 5: Yes, develop guidance docs. No more rules of thumb, eg., 1% of the solubility -- this is the 21st century and we can do better.

Option 7: yes, more on performance measurements and how to do them. I am currently trying to persuade a major contractor to follow the approach developed by Mike Annable of the U of Florida.

Hope this helps, Dick Jackson

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