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To <gwtf@emsus.com>

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Subject " Ground Water Use, Value and Vulnerability as Factors in Setting Cleanup Goals"

I took a look at EPA's Ground Water Task Force Option Paper " Ground Water Use, Value and Vulnerability as Factors in Setting Cleanup Goals".

I have no questions or comments concerning this paper, which simply identifies a number of problem statements and options on what to do next to resolve them.

Are you soliciting input on which option we the State's would like you to pursue? If so, here's my opinion.

My preference would be for EPA to pursue a combination of options 2 and 1, conducted in that order. Examples of where the presence or lack of strong ground water protection programs (option 2) would form the basis of an educational program that raises the awareness of ground water use/protection, particularly amongst those individuals responsible for overseeing cleanups by helping them to better understand the implications of current trends in ground water cleanups (option 2). This educational process should be targeted to those individuals/agencies that have the greatest influence on programs that affect the long-term quality of ground water.

General comments regarding the other options:

Option 3: It would be nice to know what other people are doing, but only if you are seeking examples of what others had done for the purpose of setting up your own program or identifying criteria for decision making purposes. That is not the case in Colorado where existing State law limits the opportunity for project managers to consider water use, value and vulnerability in setting cleanup goals. State standards have been established, with the goal of non-degradation of waters of the State.

Option 4: This is a good option for EPA staff who may be lead at cleanups in which State policies/laws are applied to the development of groundwater cleanup targets. I would like to believe that these EPA staff are already familiar with these policies and are currently applying them, making this an option of little real benefit and not worth pursuing.

Option 5: After 20+ years implementing the various cleanup programs, I would like to believe that States have already identified the serious problems that threaten valued water supplies. There may be some value to preparing a short guidance document on the subject, identifying the various factors to consider when weighing use, value, and vulnerability when making remedial decisions.

Option 6: I've never heard of SWAPs. There may be value educating remediation project managers on the efforts conducted under this other program. Yes, we should be made more aware of these source water assessment areas just as these other stakeholders should be aware of the

cleanups occurring in these designated areas.

Option 7: Anything that results in better communication between different agencies/programs would be beneficial. The trick is narrowing the scope of these meetings such that meaningful discussions can take place (i.e., pick the most vulnerable watershed and target the discussion to this one area, at least initially).

Good luck!

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non-degradation goals