

Ground Water Remedial Action Permit (RAP) Applications for Monitored Natural Attenuation (MNA)

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Overview

- ▶ BRAP's mission is to issue Ground Water RAPs that are protective of public health and safety, and the environment
- ▶ As part of that mission, BRAP's goal is to maintain, restore, and enhance the designated use(s) of the ground water resource
- ▶ Designated uses include maintenance of special ecological resources, provision of and conversion to potable water (drinking water), agricultural and industrial water supply, and other reasonable uses
- ▶ As a result, BRAP expects that Ground Water RAP Applications for MNA include sound Classification Exception Area (CEA) durations for ground water contamination at a site

Ground Water RAP Application CEA Duration

- ▶ CEA duration is important as it affects key parts of the Ground Water RAP Application review process:
- ▶ Appropriateness of the proposed ground water remedial action
- ▶ Ground Water Monitoring Plan
- ▶ RAP Schedule

MNA Ground Water RAP Applications

CEA Durations

- ▶ BRAP's general policy is the following for CEA durations associated with a MNA Ground Water RAP Application:
- ▶ Volatile Organic Compound (VOC) CEA durations should be based on actual fate and transport modeling
- ▶ Semi-Volatile Organic Compound (SVOC) CEA durations should be based on actual fate and transport modeling or be indeterminate
- ▶ Metal or other inorganic CEA durations should be based on actual fate and transport modeling or be indeterminate

MNA Ground Water RAP Applications

CEA Durations (cont'd)

- ▶ VOC CEA durations greater than 30 years may be acceptable if all source material has been remediated, an overall decreasing trend is apparent where high levels of contamination are not present, and fate and transport modeling supports the duration that exceeds 30 years*
- ▶ *If the LSRP believes a site is ready for a Ground Water RAP and does not meet this criteria, then contact the Department for a technical consultation

Active Ground Water RAP Applications

CEA Durations

- ▶ CEA durations should be estimated by the LSRP based on performance monitoring of the active remediation or be indeterminate
- ▶ Ground Water Applications with a TI Determination should have an indeterminate CEA duration given the complexity of the situation

Questions?