

GENERAL QUESTIONS AND CLARIFICATIONS

Compliance Averaging

1). Please confirm you do not need to request a variance to use compliance averaging.

Deed Notice Light and De Minimis Exception

1). Please confirm that neither of these options can be used if EPH exceeds 8,100 ppm.

2). Can we request a variance to use either of these options if additional excavation would damage an expensive driveway or other structure such as a built-in swimming pool?

UHOT Form

1). If using compliance averaging or requesting de minimis exception, in Section E do we check box for “Residual Contamination Remains and Supporting Information is Included”?

2). If using compliance averaging or requesting de minimis exception, in Section G #9 do we check the “No” box?

Ground Water Sampling and Analysis

1). If a ground water temporary point or well must be placed in the excavation is it necessary to purge the volume of the excavation if the fill below the water table was compacted in one-foot lifts and the fill was of equal or less permeability?

2). Do we need to formally request a variance regarding not including 1-methylnaphthalene as a target compound in ground water analysis? See 12/11/18 list serve e-mail.

Receptor Evaluation

1). Can we merely state that receptor evaluation was not performed as none of the triggers for conducting the receptor evaluation occurred?

Backfill

1). Does the compaction in one-foot lifts only apply to under the water table?

2). Does the requirement to use fill of “equal or less permeability” only apply to under the water table?