Capping Committee Meeting Summary for January 2, 2013, 1:00 PM in 4th Floor Main Conference Room

Attendees: Michael Burlingame (MB), Greg Giles (GG), Ken Hart (KH), Kathy Kunze (KK), Greg Neumann (GN), Elana Seelman (ES), Paul Sanders (PS), Teruo Sugihara (TS), Ted Toskos (TT), and George Vallone (GV),

Absent: Steve Chranowski (SC), Howard Nichols (HN), and Doug Weimer (DW)

1. Meeting Summary of December 5, 2012 was circulated to and approved by the committee.

2. Meeting agenda will be to discuss the submitted assignments which primarily dealt with:
   a. Cap option drafts
   b. Comments on conceptual draft

3. A compilation of the submitted work assignments due December 26, 2012 was circulated to the committee.

4. TS discussed the desired level of detail in the guidance document from the perspective of the Department. Specifically, in order to avoid responding to numerous individual inquiries or encouraging excessive requests for formal technical consultations, an adequate level of information needs to be provided to those who may not be as familiar with the topic of capping as others. The avoidance of being too prescriptive was recognized, but TS suggested that appropriate language could be used to minimize this issue. The committee acknowledged the Department's concern and did not disagree with the generic proposal of how to address it.

5. TS indicated one major area to be potentially addressed by the guidance document is operation and maintenance (O&M). GN used his sediment capping draft to illustrate the situation. After discussing the topic, the committee validated the position that O&M is an appropriate topic for this committee to address, for both upland and sediment caps. It was recognized that sediment capping is unique in its nature as well as the extent to which it is addressed in regulation. Nevertheless, sediment capping and the other capping options would be covered in the guidance document. Further discussion led to the approval of an approach that for now O&M (a general description and/or addressing of topics common to all capping options) would appear in the Introduction of the guidance document. More specific information would be inserted in an O&M section in each of the individual capping options.

6. TS advocated concentrating the information related to a specific capping option in one location (modular approach) without the need to refer to other documents or parts of the guidance

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document. This stemmed from observations on how other guidance had been used previously and had the goal of more efficient transfer of information to the users.

7. After some discussion, the committee agreed with GV's suggestion to base the content of the O&M section for each capping option on the following:
   a. Threat represented by the contamination present (acute, chronic, low level, high level, etc.)
   b. Nature of the cap material (durability, stability, resistance, etc.)
   c. Expected exposure scenario (residential, nonresidential, sensitive population, etc.)
   d. Evaluation of modes of failure (TT) (occurrence of major events that may be beyond design capabilities or potentially stress the cap option)
   e. Balancing cost of remediation and cost of O&M (GV)
   f. Specifics on how to monitor (MB)
   g. Frequency of inspection

8. Contents of the various cap sections will continue to follow the previously agreed upon structure. For now, that is:

   a. Definition/description
   b. Structure/components
   c. Benefits
   d. Applications/Limitations to include general parameters, overview of use, etc.
   e. O&M: maintenance, monitoring, etc.
   f. Bibliography support

9. TS introduced an incomplete draft on the topic of capillary breaks and why it is being put in the guidance (hexavalent chromium contamination). A discussion of whether or not this is a cap or is more a potential feature to be used in combination with a capping option occurred. Vapor barriers were also discussed as possibly falling into this latter category as well.

10. GV summarized conceptual draft comments from GV, ES, SC, TT, and KH indicating the main points included concerns about redundancy, rewording, and a desire to have a table at the end of the document that would serve as a summary.

11. PS and MB also provided comments on the conceptual draft with one of the topic they focused on being permeability, specifically how it was being defined and addressed, and permeable caps in general.

12. There was a discussion on whether or not the current approach of listing capping options and the factors that affect them and their implementation should be modified along functions of the capping options instead or perhaps some capping options listed as variants of others. For now the current capping options listed below will be developed further before resuming reconsideration of the current format:

    a. Low permeability caps: ES and MB

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b. Permeable caps: TT and KH

c. Vegetative / Landscape caps: SC and GV

d. Sediment caps: GN and HN

e. Vapor barriers: DW and PS

f. RCRA, TSCA, Solid Waste caps: MB and KH

g. Evaporation/Transpiration cap: SC and DW

h. Enhanced/treatment cap: TT and MB

i. Structure caps to include buildings: ES and GV

13. Assignments:

a. All are to review their respective capping options and modify the O&M sections to reflect the approach approved by the committee.

b. ES to check on regulatory language regarding biennial certification related inspections.

c. All are to check their respective drafts and see if the capillary break language (for hexavalent chromium) is problematic for their sections.

d. All are to evaluate whether or not there should be a separate section in the guidance document listing features that could potentially be employed as part of a capping system (i.e. capillary break).

e. Yet to be completed Factors/Consideration sections are to follow the example of those already provided in the conceptual document. Text needs include Receptors and Exposure Pathways (DW); Current and Future Site Use (SC); Community Acceptance/Aesthetics (DW).

f. GN and GG are to modify the Purpose section of the conceptual document to reflect proper PA/SI/RI completion as a necessary precursor to determining that capping is the appropriate remedial action.

14. Next meeting is Wednesday, January 16, 2013 at 1:00 PM in the 6th Floor Main conference Room of 401 East State St. Electronic submission of all assignments is requested by January 13, 2013.

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