

**Monitored Natural Attenuation
Comment Response Document
(comments received from August 2013 – May 2014)
October 30, 2014**

Comment 1: 20-year requirement seems conservative for meeting RSR goals. Should a longer timeframe be considered for some MNA sites?

The 20-year requirement is consistent with ITRC and EPA guidance and directives. The goal is for groundwater to reach groundwater quality standards in a reasonable period of time. A reasonable period of time is one that ensures that the environmental burden will not be shifted to future generations. A “generation” timeframe is determined to be 20 years.

If the model shows the plume will take longer than 20 years to attenuate below groundwater quality standards, then it would be prudent to implement an enhanced remedy to accelerate natural attenuation and achieve compliance within the 20-years interval. There may be an opportunity for the commissioner to approve an extension of this requirement to a finite number of years. However, this option would be site-specific, therefore not a self-implementing one.

Short of achieving the remedial goal using MNA or Enhanced MNA within the timeframe specified above, the alternate option is to seek a Technical Impracticability Variance for groundwater.

Comment 2: Requirements appear to be excessive and conservative. More likely to push sites back to DEEP approval rather than doing the self implementing approach.

In an effort to better evaluate comments made by our stakeholders, and in consideration that public acceptance may improve if a reliable scientific approach for evaluating a reasonable timeframe is developed, DEEP seeks proposals that focus on alternatives that would decrease the uncertainties related to prolonged cleanup approaches such as MNA.

If the decision to implement MNA is supported by a strong scientific basis, a robust site-specific Conceptual Site Model, appropriate use of sampling and monitoring methodologies in accordance with quality controls and existing state and federal technical guidance, then the environmental professional should be confident that the processes that destroy or immobilize contaminants is well understood. If this is the case, the environmental professional should be

Comment Response Document

able to determine and demonstrate that MNA is appropriate and will achieve the goal within the timeframe established. Consequently, there should not be a need to push sites back to DEEP approval. This could be more of a matter of providing additional training to the environmental professional.

Comment 3: There are so many requirements to get to approval of the Class C cleanup and then so many ongoing reporting requirements after the Class C cleanup is deemed “complete” that it doesn’t seem worth the effort of getting this cleanup approved.

The Class C endpoint would describe a site condition (certain level of remediation) at the time of verification. The Class C endpoint could be reached by using MNA.