



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Environmental Cleanup & Brownfields

Land Recycling Program Technical Guidance Manual Section II & III Revisions

**Cleanup Standards Scientific Advisory Board
Meeting
November 9, 2023**

Josh Shapiro, Governor

Richard Negrin, Secretary

TGM Revision Process

General Approach

- Comments and suggestions gathered after publication in 2019.
- Sections II and III to be presented today, Section IV at the next CSSAB meeting.
- When all edited sections have been reviewed by CSSAB and regional offices and revised, entire TGM will go out for public comment.

Section II & III Revisions

What is not addressed in this draft

- Table of contents
- Section references within text
- Updated figures
- Page numbering and formatting

Acronyms

ROL – Relief of Liability

MSC – Medium Specific Concentration

MCL – Maximum Contaminant Level

PNDI – Pennsylvania Natural Diversity Index

SWLOAD – Surface Water Loading

EPA – Environmental Protection Agency

TMS – Toxics Management Spreadsheet

LSWC – Lowest Surface Water Criteria

Acronyms (Continued)

ITRC – Interstate Technology and Regulatory Council

LNAPL – Light Non-Aqueous Phase Liquid

AUL – Activity and Use Limitation

PQL – Practical Quantitation Limit

RL – Reporting Limit

MDL – Method Detection Limit

TQL – Target Quantitation Limit

Section II Revisions

Changes adopted throughout the section

- Removed references requiring submittal of paper copies of reports
- Removed references that specified either potable or agricultural purposes for groundwater restrictions under the site-specific standard

Section II Revisions (Continued)

- A.1
 - Added clear definitions of ecological and human receptors
- A.3.a
 - Added text clarifying time frame for potentially requesting resubmission
- A.3.b
 - Clarified language regarding nonuse aquifer notices

Section II Revisions (Continued)

- A.4.a
 - Added language to clarify that non-detect compounds will not automatically receive ROL
- A.4.c
 - Added a discussion on residential vs. nonresidential properties

Section II Revisions (Continued)

- B.2.c
 - Clarified that rounding is not appropriate for comparison to MSCs based on MCLs
- B.2.c.ii
 - Added information to clarify Section 305(g) of the regulations regarding soil capacity

Section II Revisions (Continued)

- B.2.e.v
 - Added language to clarify the option of using PNDI and applicable restrictions
- B.3.c.i
 - Added language from Q&A regarding extent of characterization

Section II Revisions (Continued)

- B.3.g
 - Added language from Q&A regarding simultaneous report submissions
- Appendix II-A
 - Clarified that capping to the MSCs may not be sufficient

Section III Revisions

Changes adopted throughout the section

- Removed Table III-1 and all references to it.
- Removed Table III-2 (Random Number Table) and associated text
- Removed Table III-5 (Short list of Petroleum Products) and referred people to the storage tank closure guidance

Section III Revisions (Continued)

- A.2.a
 - Added clarification and definitions for general fate and transport terms and requirements
- A.2.e
 - Added clarification that SWLOAD shouldn't be used for chlorinated sites and that EPA has other models available

Section III Revisions (Continued)

- A.2.h
 - Reworked outline for Fate and Transport model report
- A.3.a
 - Revised this section to more clearly define “edge criterion” and define when a TMS analysis is warranted
 - Added references to the Bureau of Clean Water’s regulations and guidance for more information regarding modeling

Section III Revisions (Continued)

- A.3.b
 - Revised the section to address TMS instead of PENTOXSD
- A.3.c
 - Deleted old Section A.3.c as it is outdated and can not be verified
 - Made clarifying edits regarding comparison of MSC to LSWC
 - Added language regarding the TQL in TMS

Section III Revisions (Continued)

- A.3.d
 - Updated both examples and associated figures to use the TMS model instead of the PENTOXSD model
- B.1
 - Added language referring to the 2022 ITRC document on soil background

Section III Revisions (Continued)

- B.4.b.i.c
 - Clarified the no exceedance rule language for petroleum releases
- B.4.ii
 - Clarified that an appropriate number of samples should be collected to be sufficient for both the statistical method chosen as well as seasonality

Section III Revisions (Continued)

- C.5.e
 - Updated language to clarify how to close sites with LNAPL
- E.3
 - Added language to emphasize that fences and warning signs alone are typically not appropriate AULs

Section III Revisions (Continued)

- G.3
 - Added language to clarify the relationship of PQL/RL/MDL
- H.3.a.i
 - Added language to clarify which values to use for screening

Section III Revisions (Continued)

- H.3.c
 - Added a paragraph to clarify that justifications for surrogate toxicity values will be reviewed by the Department

Next Steps for TGM

- Continue to update figures throughout TGM
- Revise Section IV and bring to CSSAB
- Review by regional office staff
- Public comment period

Special Thanks

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Questions?

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