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DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Environmental Cleanup & Brownfields

# **Land Recycling Program Technical Guidance Manual (TGM) Revision Summary**

**January 19, 2019**

# General Structure Revisions

- Rearranged sections of TGM to provide better flow; revised Table of Contents
- New structure helped accommodate new material (Uniform Environmental Covenants Act, Vapor Intrusion Guidance)
- Reduced redundancy, removed confusing language, and consolidated similar text

# General Structure Revisions

- Removed text and figures that are inaccurate or no longer apply to the program
- Modernized graphics
- Inserted *Vapor Intrusion into Buildings from Groundwater and Soil under Act 2* as new Section IV of TGM
- Added *Groundwater Monitoring Guidance* as Appendix A

# New Section I

- Focused on introductory material
- Moved discussions about administrative procedures to new Section II
- Moved discussions on interface issues to new Section V

# New Section II

- Moved administrative guidance from Section I
- Focused Section II.A on how to get started in the Act 2 process
- Expanded site characterization and conceptual site model subsections
- Remainder of Section II focused on Act 2 cleanup standards

# New Section III

- New Section III is old Section IV (*General Guidance*); renamed *Technical and Procedural Guidance* to be more specific
- Long Term Stewardship – added subsection which includes discussion of Uniform Environmental Covenants Act (UECA), activity and use limitations (AULs) and post-remediation obligations

# New Section III

- Fate & Transport Analysis – removed outdated references; updated examples; clarified relationship between groundwater and surface water
- Statistical Analysis – encouraged use of free software; combined data quality objective (DQO) subsection with practical quantitation limit (PQL) subsection
- Data Quality and PQLs – revised the process of how PQLs are determined; removed PQL table

# New Section III

- One Cleanup Program – added subsection describing purpose, provisions and applicability, implementation, and benefits of the One Cleanup Program
- Storage Tank Program Guidance – moved general guidance from old Section IV to Section III; added new language regarding Maximum Extent Practicable (MEP) interaction with Act 2 Program; added new language regarding management of Light Nonaqueous Phase Liquids (LNAPL)

# New Section III

- Site Specific Human Health Risk Assessment – reorganized for clarity; clarified when a risk assessment is necessary; updated risk assessment screening process
- Site Specific Ecological Risk Assessment – provided sources for screening values; added discussion regarding PA Natural Diversity Inventory searches

# New Section IV

- Integrated *Vapor Intrusion into Buildings from Groundwater and Soil under Act 2*, effective January 18, 2017, as new Section IV of TGM
- Revisions from original publishing: clarified language addressing in-process Act 2 reports; clarified text in response to Q&A received in the interim; moved screening tables from guidance document to website for easier updates

# New Section V

- Info on programs in old Section III (Solid Waste Facilities, Clean Streams Law, Clean Air Act and Air Pollution Control Act, Regulated Storage Tank Release Sites, HSCA/CERCLA Remediation) moved to Section V – *Relationship to Other Environmental Statutes*
- Solid Waste – added cross-reference to Management of Fill Policy; clarified the need for permits when moving fill
- Clean Streams Law – strengthened erosion and sediment control subsection

# New Section V

- Clean Air Act and Air Pollution Control Act – enhanced language regarding radon abatement systems and permit waivers
- Regulated Storage Tank Release Sites – moved language from old Sections I and III regarding Regulated Storage Tank Release Sites; added language regarding management of Separate Phase Liquids (SPL)

## New Section VI

- Removed all web links to prevent disconnection with links due to website movement
- Reordered the list of helpful documents based on order of reference in the text
- Removed outdated references and added up-to-date references



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## Questions?

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