



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Environmental Cleanup & Brownfields

Land Recycling Program Technical Guidance Manual Sections V & VI Revisions

**Cleanup Standards Scientific Advisory Board Meeting
November 16, 2016**

**presented by:
Michael Maddigan
PADEP**

Tom Wolf, Governor

Patrick McDonnell, Acting Secretary

TGM Revision Process

General Approach

- Each revised Technical Guidance Manual (TGM) section presented to Cleanup Standards Scientific Advisory Board (CSSAB) at 2016 meetings
- All sections will also be individually reviewed by regional office staff
- TGM will be revised and compiled into one draft document then presented to CSSAB again for review prior to public comment

Sections V & VI Revisions

What is addressed in this draft

- New Section V is old Section III – *Relationship to Other Environmental Statutes*
- Info on other programs formerly in old Section I.D moved to new Section V
 - Regulated storage tanks release sites
 - Short list of petroleum products
 - Management of separate phase liquids (SPL) under Act 32
 - Solid waste facilities
 - HSCA/CERCLA sites

Sections V & VI Revisions

What is addressed in this draft (continued)

- Rewrite of SPL section
- Will add Oil & Natural Gas Remediation section when revised spill policy is finalized
- Section VI is old Section V – *Related Documents of Interest*
 - Updated content and removed internet links

Sections V & VI Revisions

What is not addressed in this draft

- Section references within text
- Updated figures
- Page numbering and formatting

Solid Waste

- Added cross-reference to Management of Fill Policy
- Added clarification on when permits are required if fill is moved within an Act 2 site or between two different Act 2 sites

Clean Streams Law

- Added discussion of how to use the site-specific standard to meet surface water quality criteria
- Strengthened the erosion and sedimentation control section by referencing Chapter 102.8 to explain post-construction stormwater management (PCSM) requirements at Act 2 sites

Clean Air Act/Air Pollution Control Act

- Explained that the installation of radon-type vapor mitigation systems as part of an Act 2 remediation are covered by the permit waiver under Section 902(a) of Act 2
- Included language regarding when and what type of testing is needed for radon abatement systems

▶ Regulated Storage Tank Release Sites

- Original strategy was to incorporate all Storage Tank guidance from various sections of the old TGM into Section V of the new TGM.
- However, that strategy has changed.

▶ Regulated Storage Tank Release Sites

- A portion of the Storage Tank Program Guidance has been included in Section V.
- Another Portion of the Storage Tank Program guidance was recently completed and will be incorporated into Section III.

▶ Regulated Storage Tank Release Sites

Section III will include:

- General guidance from old Section IV
- Maximum Extent Practicable (MEP) language developed in consultation with the CSSAB.

▶ Regulated Storage Tank Release Sites

Section V will include:

- Language from old Sections I and III
- Management of light non-aqueous phase liquids (LNAPL) language developed in consultation with the CSSAB.

Section VI

- Removed all web links
- Reordered the list of documents based on order of reference in the text
- Removed outdated references
- Added up-to-date references

Next Steps

- Continue to update figures throughout TGM and add case studies
- Add Oil & Natural Gas Remediation section when revised spill policy is finalized
- Add final vapor intrusion guidance as Section IV
- Combine all sections into one document for review by CSSAB and regional office staff



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Discussion?