

Memorandum

Environmental Resources Management

To: Dave Hess, Chief

Company: PADEP – Land Recycling Program

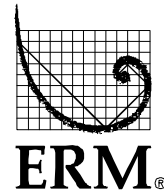
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File number: 0002740

Date: 26 March 2004

Subject: Request for CSSAB Determination on the
Formation of a Subcommittee to Develop a
NAPL Management Approach under Act 2

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The standard regulatory approach with regard to NAPL is to recover NAPL to the maximum extent practicable. Experience indicates that using this approach leads to a “no endpoint” strategy that has no specific objectives. The lack of characterization of NAPL distribution and characteristics leads to ineffectively applied technology to remediate the NAPL. This leads to delayed closures, backlogs and over-allocation of limited resources.

There is a disconnect between the strategy used for management of soil and ground water corrective action and the management of NAPL. The corrective action strategy has evolved to include a background, statewide health, and site-specific standards (i.e., risk based corrective action approach), whereas the NAPL management strategy has historically been to remove NAPL to the maximum extent practicable without any options. The term ‘*extent practicable*’ is performance-based terminology and fits well into a risk based corrective action program. The tools developed by the American Petroleum Institute (API) aid in defining the extent practicable through NAPL characterization methods and analytic modeling solutions that have been packaged into a simple-to-apply Excel™ spreadsheet. Similar to the Dominico Model for fate and transport modeling, the API solution would be applied to better understand the distribution and the potential recoverable amount of NAPL such that proper decisions can be made with regard to NAPL management. The Texas program is currently implementing these tools in their approach to managing NAPL, and hopefully through the formation of a subcommittee, a NAPL management approach can be developed for Pennsylvania that is specific to the Act 2 process.