



**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

Jessica Shirley, Interim Acting 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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