

Meeting Minutes
Cleanup Standards Scientific Advisory Board
Hybrid Virtual (Microsoft Teams) & In-Person Meeting (RCSOB Room 105)
July 16, 2025

Cleanup Standards Scientific Advisory Board (CSSAB) Members Present

Charles Campbell, Chairperson*
Joel Bolstein
James Connor
Colleen Costello
Mark Urbassik
Donald Wagner
Stephanie Gundling (Alternate)
Neil Ketchum (Alternate)
Anneclaire De Roos
Mark Smith

Department of Environmental Protection (DEP) Staff Present

Troy Conrad*
Michael Maddigan*
John Gross*
Brie Sterling*
Deborah Miller*
Yumi Creason*
Dana Marshall*
Shay Decker*
Lindsay Williamson*
Bill Rafferty*
Cael Willmer*
Laura Griffin
Julia Raley
Nikolina Gaudin

Members of the Public Present

Terry O'Reilly
Krish Patel
William Hitchcock
Brendan O'Donnell
C. Conrad Martin
Nate Eachus

* Attended meeting in person. If no asterisk, then attendance was virtual.

Open Meeting

CSSAB chairman, Mr. Charles Campbell, opened the meeting at 0930.

Approval of Minutes

No comments were raised on the minutes from the April 23rd meeting. Mr. Joel Bolstein motioned to approve, seconded by Ms. Colleen Costello. The minutes were approved.

Administrative Issues

Any changes to Board contact information should be forwarded to Ms. Brie Sterling to be updated on the CSSAB webpage.

Membership

Ms. Sterling stated that the CSSAB currently has 12 members. There is a single vacancy under the House Speaker, the other House Speaker appointment is expired, belonging to Mr. Charles Campbell. There are two House Minority positions that are expired, belonging to Ms. Tina Serafini and Mr. Donald Wagner.

Land Recycling Program Staffing Update

Mr. Michael Maddigan stated that there are no personnel changes in Central Office, both sections are fully staffed.

Rulemaking Update

Mr. Maddigan explained that the proposed Chromium (VI) rulemaking was published in the PA Bulletin on June 28th for a 30-day public comment period. After this, the Independent Regulatory Review Commission has until August 27th to complete their review. Once those reviews are finished, the Land Recycling Program (LRP) will review and respond to any comments that were received. Those responses will then be shared with CSSAB, at an interim meeting if necessary.

The final Chapter 250 rulemaking documents, including the comment response document, are currently under internal review. Mr. Maddigan anticipates presenting the final document to the Environmental Quality Board (EQB) in November 2025.

Program Statistics

Mr. Maddigan stated that as of July 1, 2025, there have been 8,703 sites completed through the Act 2 program, and 1,927 are currently in progress. So far in 2025, there have been 135 Notices of Intent to Remediate (NIR); the three-year mean is 235 NIRs per year.

In addition to the usual tracking of report approval rates in the short term, LRP examined approval rates over the past ten years to identify long term trends. It was discovered that report approval rates have increased, rising from 77% in 2015 to 79% in 2024. Approval rates for reports using the Statewide Health Standard are higher than those for reports using a Site-Specific Standard. LRP is developing a series of Act 2 trainings that should help improve approval rates by providing education to remediators and to DEP staff.

Mr. Campbell inquired as to what happens with the 20% of reports that are disapproved. Mr. Maddigan explained that many disapproved reports are resubmitted with corrections and subsequently approved. The goal for LRP is to reduce the number of initial disapprovals.

Mr. Bolstein recommended that, since approval rates for the Site-Specific Standard are lower, LRP should focus on approval rates for Remedial Investigation Reports (RIR) and Cleanup Plans. He explained that remediators can be frustrated if their preliminary reports are approved, only to have their final reports disapproved with requests for more investigative work, delaying the project and requiring additional expenditures. He requested that LRP look into RIR approval rates to explore the effect on final report approvals. Mr. Bolstein also mentioned encountering issues with having Environmental Covenants (EC) reviewed in a timely manner. He requested that LRP investigate the average time it takes for ECs to be approved. Mr. Maddigan agreed to look further into the data for individual report types.

Mr. Campbell mentioned that he has occasionally seen reports be disapproved by the regional offices solely on the basis of the reports being combined into one submission, which is allowed by Act 2. Mr. Maddigan explained that combined reports are allowed only in certain circumstances, and that submitting a combined report runs the risk of having the entire combined submission disapproved rather than a single report. Ms. Costello recommended being in dialogue with the DEP Project Officers to ensure that each project goes smoothly.

Upcoming Training Opportunities

Mr. Maddigan described how the LRP is continuing to partner with the Pennsylvania Council of Professional Geologists (PCPG) to create a series of four webinars on Act 2 basics and each of the cleanup standards. LRP anticipates that the first webinar will be hosted in September before professional development hours (PDHs) are due. Following the release of these webinars, two in person trainings will be offered, one in the eastern part of the state and one in the west. These trainings will dive deeper into technical issues, discuss case studies, and provide an opportunity to gather face to face and ask detailed questions about Act 2.

LRP has partnered with Ms. Costello and her associates at Sanborn Head to develop a Risk Assessment training. Work is in progress, and LRP will inform the Board when it is ready to be scheduled.

The EC Workgroup is continuing to investigate ways to improve the EC creation and approval process. The workgroup intends to develop training to provide remediators with clarity on what LRP expect and to provide example language beyond what exists in the model EC. Ms. Costello suggested that the Workgroup meet with members of the Board to discuss the types of problems remediators encounter during the EC process. Mr. Maddigan explained that the Workgroup is currently internal to DEP but indicated that they would consider soliciting input from the Board in the future. Mr. Donald Wagner

requested that any draft guidance created by the Workgroup be shared with the Board for comment before publishing.

This fall, LRP will be partnering with EPA Region 3 and Mid-Atlantic TAB to host funding trainings to prepare stakeholders for grant season.

LRP will once again be hosting several Brownfields Basics trainings in the fall. There are plans to restructure the trainings, but no specifics yet.

The 2026 PA Brownfield Conference will be held March 23-25 at the Wind Creek Event Center in Bethlehem. The planning committee has been meeting monthly since March of 2025.

Mr. Bolstein requested an update on his request to revise the One Cleanup Program Memorandum of Agreement (MOA) between DEP and EPA. Mr. Maddigan has been meeting regularly with EPA to discuss the One Cleanup Program. The first priority is to update the language on DEP's One Cleanup Program webpage. They are also developing guidance and fact sheets that outline the differences between Act 2 and RCRA. Mr. Bolstein recommended that LRP seek RCRA Corrective Action authorization, as removing EPA involvement with sites would make the Act 2 process much smoother. Ms. Costello asked whether sites going through the One Cleanup Program can only be approved once both Act 2 and EPA's processes are complete. Mr. Maddigan confirmed that Act 2 and RCRA approvals are separate which leads to confusion considering how the MOA is currently written. The LRP is working to resolve this problem by revising the language in the MOA.

PFAS Action Team Update

Mr. Josh Neyhart provided the Board with updates on the PFAS Action Team, a group of senior leaders from various DEP programs who meet monthly to discuss issues related to PFAS.

The action team put together a data gathering team comprised of internal and external participants to study the issue of PFAS in biosolids, including reading current research and examining how other states are responding to this issue. They found a study from Michigan reporting that high levels of PFAS in biosolids could be traced to industrial sources upstream. They were able to limit effluence through NPDES permits. The data gathering team finished their work in June, having put together a document outlining their findings and providing guidance on DEP's work to address PFAS in biosolids, though DEP has not yet decided on what actions will be taken. Mr. Bolstein suggested that the action team separate concerns regarding historic biosolids application from applications originating after the PFAS standards were created. He urged that the action team think long-term into the future when deciding on how to respond to these issues.

A lawsuit has been raised against the new federal drinking water MCL, which the federal administration has been slow to respond to. In the interim, they have announced in a press release their intention to maintain the 4ppt MCL for PFOA and PFOS and to extend the compliance deadline from 2027 to 2029. They will be reexamining the Hazard Index approach for PFHXS, PFNA, and the Gen X compounds. They have also announced the PFAS OUT initiative to work with public water utilities on their PFAS compliance. The uncertainty within the federal government has put stress on the Commonwealth's Safe Drinking Water program, who have been receiving an increase of questions about the federal PFAS rules.

All public water systems are now required to conduct quarterly PFAS testing, and the first two quarters of testing results are hosted on the DEP website. Compliance with testing requirements has been commendable.

Mr. Bolstein reminded the Board that PENNVEST has funding available for PFAS-related projects where people need to be connected to public water, upgrades, new treatment plants, and more. Funding for each project consists of 75% grant funding and 25% funding through low interest loans.

Mr. William Hitchcock requested that DEP formulate policy or guidance on how PFAS affects the Management of Fill Policy. Mr. Neyhart will discuss this issue with the Waste Program. He also explained that some of the feedback in the draft Chapter 250 Final Rulemaking Comment Response Document will hopefully provide at least preliminary guidance. Ms. Costello offered for the Board to provide a summary of their questions and concerns to help guide the conversation, which Mr. Neyhart confirmed would be helpful. Ms. Costello and Mr. Hitchcock will take the lead on developing this document.

Mr. Troy Conrad suggested the Board consider bringing back to the table Ms. Costello's suggestion of creating a PFAS workgroup. Mr. Campbell will discuss workgroup creation with Mr. Maddigan and Ms. Sterling. He requested that any Board members or other stakeholders interested in joining the workgroup contact him.

Chapter 250 Updates

The previous Board discussions of the draft-final Chapter 250 rulemaking mistakenly omitted Appendix A Table 7, so Ms. Sterling presented Table 7 to the Board and asked for any input. Ms. Sterling explained that there were no changes made to this table between the proposed and final drafts of the rulemaking. The Board did not raise any comments or questions regarding Table 7.

Board Comments

Mr. Mark Smith requested clarification on a project where his team was asked to remove information regarding their Phase I and Phase II investigation from their remedial investigation report. Mr. Maddigan explained that the reasoning may have been that Phase I and Phase II investigations are not formal parts of the Act 2 process, and the Project Officer may have been concerned that approval of the report would come across as approval of the Phase I and II reports. However, he clarified that Act 2 policy does not require the removal of Phase I and II investigations from reports. Mr. Maddigan requested that Mr. Smith call him to talk in more detail.

Mr. Hitchcock asked whether it would be helpful for the Board to send DEP a summary of issues they have encountered with the One Cleanup Program. Mr. Maddigan agreed that it would be helpful to receive input on ways to improve the program and requested Mr. Hitchcock send the summary of issues to him. Mr. Campbell asked whether the guidance documents LRP is preparing will be brought to the Board or be directly turned into policy. Mr. Maddigan explained that any changes would directly become policy, though any technical issues that arise may be brought to the Board first.

Public Comments

There were no public comments.

Next Meeting

The next CSSAB meeting is scheduled for October 22nd, 2025.

Closing

Mr. Campbell motioned to adjourn the meeting, with Mr. Hitchcock seconding the motion. The meeting was adjourned at 1100.