

memorandum

DATE: January 28, 1997

REPLY TO
ATTN OF: Office of Environmental Policy and Assistance(EH-413):Nakata:6-0801

SUBJECT: **GROUND WATER PRESUMPTIVE RESPONSE STRATEGY**

TO: Distribution

PURPOSE OF THIS MEMO To provide DOE elements with information on the Environmental Protection Agency (EPA), Office of Emergency and Remedial Response guidance entitled: "*Presumptive Response Strategy and Ex-Situ Treatment Technologies for Contaminated Ground Water at CERCLA Sites*."¹ The guidance was developed as part of the Superfund Administrative Reforms to accelerate contaminated site cleanups. The purpose of the presumptive response strategy is to use the Superfund program's past experience to streamline site investigations and speed up selection of cleanup actions.

PURPOSE OF PRESUMPTIVE REMEDIES EPA expects presumptive remedies to increase consistency in remedy selection as well as implementation and, thereby, reduce the cost and time to cleanup similar types of sites. The presumptive remedies approach is one tool within the Superfund Accelerated Cleanup Model (SACM).² Presumptive remedies are preferred technologies for common sites, based on historical patterns of remedy selection and EPA's scientific, engineering evaluation of performance data on technology implementation.

IMPLICATIONS TO DOE FACILITIES Previous EPA guidance and fact sheets from the Office of Solid Waste and Emergency Response have provided general information on the presumptive remedy process and issues common to all presumptive remedies. To date, EPA has established presumptive remedies for municipal landfill sites, for sites with volatile organic compounds in soil, and for wood treater sites. Collectively, EPA's previous publications provide presumptive remedies (or a strategy for selecting remedies) for "source control" at specific types of sites. With respect to *ground water* response, source control refers to containment or treatment of materials that may leach contaminants into ground water, or a combination of these approaches. In general, treatment is expected for materials comprising principal threats posed by the site, while containment is preferred for low-level threats. Where contaminants have reached ground water and pose an unacceptable threat to human health or the environment, DOE facilities will generally be required to implement a ground water remedy in addition to a source control remedy.

¹ EPA, Office of Emergency and Remedial Response, "*Final Guidance: Presumptive Response Strategy and Ex Situ Technologies for Contaminated Ground Water*", dated October 21, 1996 (OSWER Directive 9283.1 - 12).

² DOE, Office of Environmental Policy and Assistance, CERCLA Information Brief: "*SACM and the RCRA Stabilization Initiative: Similarities of Principles and Applicability*", EH-413-067/0196 (January 1996)
[<http://www.eh.doe.gov/oepa>]

Instead of establishing one or more presumptive remedies, this new guidance from EPA defines a presumptive response strategy. DOE remedial project managers should consult the October, 1996 guidance for an explanation of EPA's use of the term "presumptive technologies" to denote the ex-situ treatment component of a ground water remedy as distinguished from other remedy components. *The presumptive response strategy integrates site characterization, early actions, remedy selection, performance monitoring, remedial design and remedy implementation into a comprehensive, overall response strategy for sites with contaminated ground water.* EPA expects that some elements of this response strategy will be appropriate for all sites with contaminated ground water and all elements of this strategy will be appropriate for many of these sites.

In keeping with the Agency's efforts to seek consistency between the CERCLA response and RCRA corrective action programs,³ EPA emphasizes that its presumptive remedy guidance should be used for both CERCLA Response Action and RCRA Corrective Action sites. Additionally, the DOE Offices of Environmental Management (EM) and Environment, Safety and Health (EH) continue their cooperative efforts to develop a presumptive remedy for metals in soils under a joint initiative with EPA. As this initiative progresses, further information will be provided under separate cover.

ACCESS TO GUIDANCE The EPA ground water presumptive response guidance is available on the INTERNET via the EPA Superfund Homepage at:
<http://www.epa.gov/superfund/index.htm>

ADD'L INFO If you have any questions regarding the EPA guidance or this memorandum, please contact Katherine Nakata of my staff by...

- o calling (202) 586-0801
- o faxing messages to (202) 586-3915
- o communicating electronically, via Internet, to
 katherine.nakata@eh.doe.gov

Thomas T. Traceski
Director, RCRA/CERCLA Division
Office of Environmental Policy and Assistance

³DOE, Office of Environmental Policy and Assistance memorandum dated October 12, 1995, subject: "Guide to Ground Water Remediation in CERCLA Response Action and RCRA Corrective Action Sites", DOE/EH-0505.
[<http://www.eh.doe.gov/oepa>]