

Commentary

TO: Ken Lovelace at gwtf@emsus.com

FROM: Jack Gelting _____

RE: *Cleanup Goals Appropriate for DNAPL Source Zones*

EPA's Groundwater Task Force should be commended for the development of the above, as it serves its informational purpose well, and encourages alternatives to unrealistic remediation goals.

I suggest a system of rewarding mass removal of DNAPL regardless of the fraction of total mass that it represents. This suggestion pertains to Problem Statements 1 & 2, in particular. Site owners and regulators are more likely to collaborate if some form of success can be envisioned. Thermal and oxidation (as well as promising or future) technologies will be used more often.

A quantitative value can be attached to a pound of DNAPL removed from the subsurface environment with a simple economic analysis. Each site's regulator and owner would be tasked with achieving a covenant as to how the value of the DNAPL removed would be applied to offsetting the present or future cost of compliance. Examples of these offsets include reduced penalties, monitoring reduction and reporting relief. These are practical in cases where covenants have been achieved, because trust has increased and regulatory oversight can decrease accordingly.

Standard language can easily be developed that cautions all parties regarding partial remedies and reminds them of the potential for future technologies to increase the practicability of complete remediation.

RE: *Groundwater Use, Value and Vulnerability as Factors in Setting Cleanup Goals*

The discussion of Groundwater Value could be improved with a reference to the distinction between resources and reserve resources. A reserve resource is that part of an identified resource from which a usable commodity can presently be extracted. The use of a reserve resource is practical, legal and

financially feasible. These criteria describe a subset of groundwater resources. Use of some groundwater resources may be unexpected, they are still resources, but not reserve resources.

With respect to Problem Statement 3 and the reasonable expectation of use of groundwater as a source of drinking water, the writer believes that quantitative measures can be more broadly applied to make this determination. Examples include threshold values of total dissolved solids and yield.