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Subject EPA's Ground Water Task Force -- suggestions for DNAPL & Value/Vu Inerability Discussion Papers

I am a member of the National Ground Water Association and a member of one of NGWA's Government Affairs subcommittees.

Chris Reimer of NGWA sent out the 2 Discussion Papers, saying we have until today to comment -- with special emphasis on suggesting solutions. Here goes (to just barely beat the deadline).

DNAPL Discussion Paper: I suggest adding an option that addresses creation of effective "carrots", primarily for the regulated community (industry, municipalities, DOD, DOE, etc.) but also for the regulators. Carrots could be in the form of Brownfields-designation facilitation, for the oft-encountered problem of selling "damaged" property. Coupled with this should be stronger emphasis on n-year reviews of progress, and statistically- and modeling-based demonstration of progress (or more importantly, lack thereof) -- with clearly-defined criteria for replacing ineffective remediation systems with more appropriate alternatives. This would provide the regulated community with "hard and fast" rules on which to base decisions and commitments. This option should also be founded on the incorporation -- to the extent practicable -- of new techniques that show promise, with incentives for the regulated and the regulators to introduce such techniques, even in "mid-stream."

Groundwater vulnerability/value: I recommend using a system like DRASTIC for helping set priorities for addressing CERCLA and RCRA sites. The priorities would be based on relative levels of receptor vulnerability, as well as the "strength" and mobility of the contaminant sources. Given the availability of GIS-based mapping, DRASTIC-type systems can be very powerful, cost-effective, and easily understood and accepted by all stakeholders. With the resource/receptor mapping based on work by USGS and other unbiased, scientific-mission agencies, credibility in the results should be relatively high. I can provide an example project in which EPA used this approach to help set priorities for agency actions.

A second recommendation regarding GW vulnerability/value: Yes, stakeholder involvement should be a key component of EPA's approach. Tools and approaches are available for increasing and facilitating stakeholder involvement -- including software-based systems for helping blend quantitative and qualitative elements in a systematic way. I can provide several examples from CDM projects, mostly in the area of water supply planning and management. Also, non-profit organizations devoted to GW are at the ready to help facilitate stakeholder participation, including NGWA, as well as the American Ground Water Trust (AGWT), on whose Board I now serve.

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