



lovelace.kenneth@epamail.e
pa.gov

06/23/2004 03:59 PM

To gwtf@emsus.com

cc

bcc

Subject Fw: EPA Groundwater Task Force Issue DNAPL Papers

Mark-

Thank you for copying me on this. I have shared it with members of our SERDP DNAPL Advisory Panel. I will continue to look at it, but I noted with interest a few of the options being considered:

1. Option #5 (Develop guidance on recommended methods and approaches for delineating source zones"). SERDP has funded a significant amount of work on innovative characterization technologies. We could probably provide some help in this area, and I personally believe it is a difficult but important problem - the definition of what constitutes the "source" needs to be flexible but not arbitrary. It would help our "DNAPL Source Zone" initiative if we understood how EPA was planning to define the source zone.
2. Option #6 ("Develop guidance providing a qualitative approach for determining when source depletion should be implemented"). My understanding is that the NRC panel, whose report is due shortly, will produce a start towards this goal. In addition, it is a stated goal for our own R&D program within SERDP on source depletion technologies for chlorinated solvent DNAPLs, so cooperation in such an effort would be beneficial.
3. Option #7 ("Develop guidance on performance measures for the effectiveness of DNAPL mass removal"). The ITRC DNAPL team is in the process of finalizing its report on performance assessment, and Linda Fiedler has been on this team. While it may not be a prescriptive as some might like, it is a significant step towards the type of guidance document suggested in this option. Also, ongoing SERDP-funded projects are seeking to address this goal, and the results of that work would be very valuable to such an EPA guidance effort.
4. Option # (Develop guidance describing improved methods for comparing long-term remedies"). This is an area that I have long been interested in. The stated rationale for many source depletion efforts is to reduce life-cycle costs and/or to reduce plume longevity. Yet we have little good technical basis for our projections of long-term costs or longevity impacts. Cooperative efforts to monitor real-world impacts of carefully-monitored source treatment projects over a significant period of time could greatly improve our projections and decision-making.

In short, I am encouraging at least informal cooperation with the EPA Ground Water Task Force in this area. We are currently funding work that is directly relevant to the goals of this task force, and future cooperation on at least these objectives would make the best use of limited federal funds.

Thanks again for sharing the discussion paper.

Hans Stroo
(541) 482-1404