

US EPA ARCHIVE DOCUMENT



RE: response to PRP comments re : RIDEM ARARs
Louis Maccarone to: Gretchen Muench
Cc: "Matthew Destefano", Anna Krasko

09/20/2012 09:37 AM

Gretchen,

Pursuant to our discussions yesterday, please see the following response to the issue of RIDEM's Leachability Criteria raised in the recent comments.

When submitting the RIDEM Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations), it was the intent of the Department to provide Chemical-specific criteria as found in the Direct Exposure and Leachability Criteria tables in specific Sections 8.02.B and 8.03. In the interest of applying standards consistently, it was not the intent of RIDEM to allow for the development of site-specific standards as described by the Site Remediation Regulations Method 2 and Method 3 requirements. In this respect, RIDEM disagrees that the GB Leachability criteria were incorrectly applied at the Centredale Manor Superfund Site.

With respect to the omission of SPLP analysis, the use of SPLP analysis applies to estimation of potential leaching for inorganic Hazardous Substances, as described in the Site Remediation Regulations Section 8.02.B.ii. As PCB is considered an organic compound, SPLP analysis is not appropriate.

Thanks
Lou



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