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RITER
CONSULTANTS, INC.**



**Environmental
Site Development
Surveying & Mapping
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Health & Safety
Human Resources**

PITTSBURGH • ALTOONA, PA • MIDDLETOWN, DE

HEADS UP FOR NJ SITES: NJDEP no longer accepts applicability determination applications; instead, see *How to Determine if ISRA Applies to You* at www.nj.gov/dep/srp/isra.

TABLE 1. ORDER OF MAGNITUDE DECREASES (mg/kg)

CONTAMINANT	RESIDENTIAL		NON-RES.	
	OLD	NEW	OLD	NEW
1,4-Dichlorobenzene	570	5	10,000	13
1,1,2,2-Tetrachloroethane	34	1	70	3
1,1,2-Trichloroethane	22	2	420	6
1,1-Dichloroethane	570	8	1,000	24
4-Methylphenol	2,800	31	10,000	340
Bis(2-Chloroisopropyl)ether	2,300	23	10,000	67
Bromodichloromethane	11	1	46	3
Bromomethane	-	-	1,000	59
Chloroform	19	0.6	28	2
Chloromethane	520	4	1,000	12
Dibromochloromethane	110	3	1,000	8
Hexachlorocyclopentadiene	-	-	7,300	110
Naphthalene	230	6	4,200	17

• People • People •

The Pennsylvania Department of Environmental Protection (PADEP) has recruited C/R's **Pat O'Hara** to support implementation of the Uniform Environmental Covenant Act passed in February 2008 • **John Matviya**, former Southwest Regional Manager for PADEP, has joined C/R's staff as a Senior Consultant • **Dean Johnson** has joined C/R's staff as a Field Geologist

This issue: C/R takes a look at progress—that double-edged sword! New soil remediation standards, instant & erroneous communications, a warning for soil samplers, & how to warm yourself by the...fishing rod. Enjoy.



New Remediation Standards May Impact Redevelopment Progress

If 420 comments from 68 persons are an indicator, **New Jersey Department of Environmental Protection's (NJDEP's)** adoption of Soil Remediation Standards (SRS) to replace Soil Cleanup Criteria (SCC) on June 2, 2008 may be the state's biggest environmental news this millennium. Nearly a third of commenters lauded the new rule's "improved scientific basis" and risk-based aspects, but many more voiced concern about impeding Brownfields redevelopment progress. Going from 109 residential / 108 non-residential SCC to 134 residential / 136 non-residential SRS, only 12 direct-contact standards escaped change. A *Brief* summary:

- **Re-opener Potential:** 11 residential / 13 non-residential standards (Table 1) are more stringent by at least an order of magnitude (factor of 10). Sites with these organics must now meet SRS, and parties responsible under the state's Spill Act (i.e., not volunteers) may have to remediate further, even with an approved remedial action work plan (RAWP) or no further action (NFA) letter in hand. If there is no viable responsible party, public money may be used. NJDEP says the majority of NFA letters will not be revoked.
- **Window of Opportunity:** For 36 residential / 40 non-residential standards lowered by *less than* an order of magnitude, SCC can still be used if a compliant RAWP or similar report is submitted by December 2, 2008.
- **More Opportunity:** 44 residential / 46 non-residential standards that are less stringent offer a chance for sites that did not meet SCC to be relieved of engineering or institutional controls.
- **New Risk-Based Option:** There is a provision for site-specific alternate remediation standards (ARS). Applications may be submitted as part of RAWPs or separately, and no variance petition is needed. Nearly half of commenters voiced concern about the application process overwhelming NJDEP's staff and impeding redevelopment. NJDEP does expect "a large number of petitions" but believes additional resources spent now will be offset by less resources required to complete remediation.
- **New / Dropped Contaminants:** There are standards for 35 new contaminants while standards for eight were dropped. The procedure to develop interim standards for contaminants with no standard has drawn fire from many commenters who believe NJDEP is bypassing procedural requirements.
- **Practical Quantitation Limits (PQLs):** The new standards are basically the more stringent of ingestion/dermal and inhalation health-based criteria, but no lower than PQLs. Five residential and two non-residential standards are set at PQLs, meaning any measurable concentration would have to be addressed. NJDEP does not expect a big overall increase in soil disposal citing on-site treatment options and the loosening of many standards, though they do acknowledge a potential shortage of clean backfill.
- **Total Petroleum Hydrocarbons (TPH):** The ecologically based total organics cap of 10,000 ppm measured as TPH was eliminated, so individual contaminant standards must be used until a replacement is provided. Guidance exists for phase-in, order-of-magnitude contaminants, and developing ingestion-dermal, inhalation, and impact-to-groundwater standards, and chromium and TPH guidance are forthcoming. Go to www.cummingsriter.com for links to guidance, responses to comments, and other helpful information.

BIRD'S EYE VIEW: Instant Communication

As I write this, I'm preparing for a church mission trip with a group of teens. Some of you may think that I, myself, still need a chaperone, so let me clarify—I'm one of the leaders, a role I take seriously (and for the record, most of those stories are urban legends). A rule of the trip is that, upon arrival, cell phones will be collected and returned for only one hour per day. As a consultant, I certainly understand the value of cell phones in business, but as the father of two daughters, I understand that they are *everything* to a teen. And you should hear the outcry! By the reaction so far, I may spend most of the trip in the hospital with teens exhibiting strange symptoms that turn out to be cell phone withdrawal. Having been in environmental consulting for over 30 years, I survived before e-mail, cell phones, and PCs, and I know the world won't end if I don't respond to a text message *immediately*. After the trip, the teens will know this also—and maybe a few other useful things. Don't worry—my staff will be on call. Hmm...no cell phones or e-mail for a week? Sounds like progress to me!



Ken Bird, VP

SAMPLING METHOD ALERT

When using Method 5035 (methanol preservation) to sample soil or sediment that may be high in organic carbon, sodium bisulfate, the preservative used for the low-level sample fraction, can react with carbon to generate acetone as a byproduct. Options are to replace sodium bisulfate with deionized water, freeze samples immediately, or use Encore® samplers.

ABANDONED FISHING GEAR RECYCLED INTO ENERGY

Abandoned fishing gear is threatening coastal marine life. Although many a frustrated sportsman has flung the occasional rod, commercial gear is the culprit, and volumes are such that a fisherman's typical daily catch can be more gear than cod. Until now, they paid for landfill disposal or threw it back, but a new program, Fishing for Energy, recycles gear at a waste-to-energy plant for free. A ton of nets, lines, and other gear can power the average home for 25 days. Progress. Definitely progress.



DRIVER CHECKLIST: KEYS? CHECK GPS? CHECK COMMON SENSE? UMM...

This year C/R got Global Positioning Systems (GPS) to navigate to project sites, some of which are quite remote. GPS may have saved a few marriages, but is it true technological progress which, by definition, promotes the public's well-being? Consider these real-life incidents:

- In New York, a driver was "merely trusting" his GPS when he drove in front of a train going 60 mph; he barely escaped the fiery crash. Another driver put her "complete trust in (the GPS) and it led right into the path of a speeding train."
- A Czech truck driver named Yuri spent three days wedged in an incredibly narrow lane in England onto which he proceeded after failing to find anyone who understood his native language when he asked, "Excuse me, do you think this *ginormous truck here* will fit through *that teeny, tiny opening there*, like my GPS says?" (See photos on our website.)
- One bus company banned GPS usage after a driver roamed for seven hours with a busload of 8-year olds looking for their field trip destination.
- A German motorist obediently followed directions straight into a huge sand pile.
- GPS directions sent drivers through a shallow point in the Avon River. Neither posted signs nor the sight of the engulfing river itself swayed them, and locals fished out one or two cars a day at £20 each for weeks.

One report tells of a Slovakian truck driver who burst into tears after getting wedged on a narrow road, but any Pittsburgher knows it takes way more than that to ruffle a Slovakian trucker. The lesson, though, is clear: blind obedience to a GPS does not promote well-being. Pack the GPS...and your common sense, too.

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