

# Checking In On the MRBCA Revision and Update

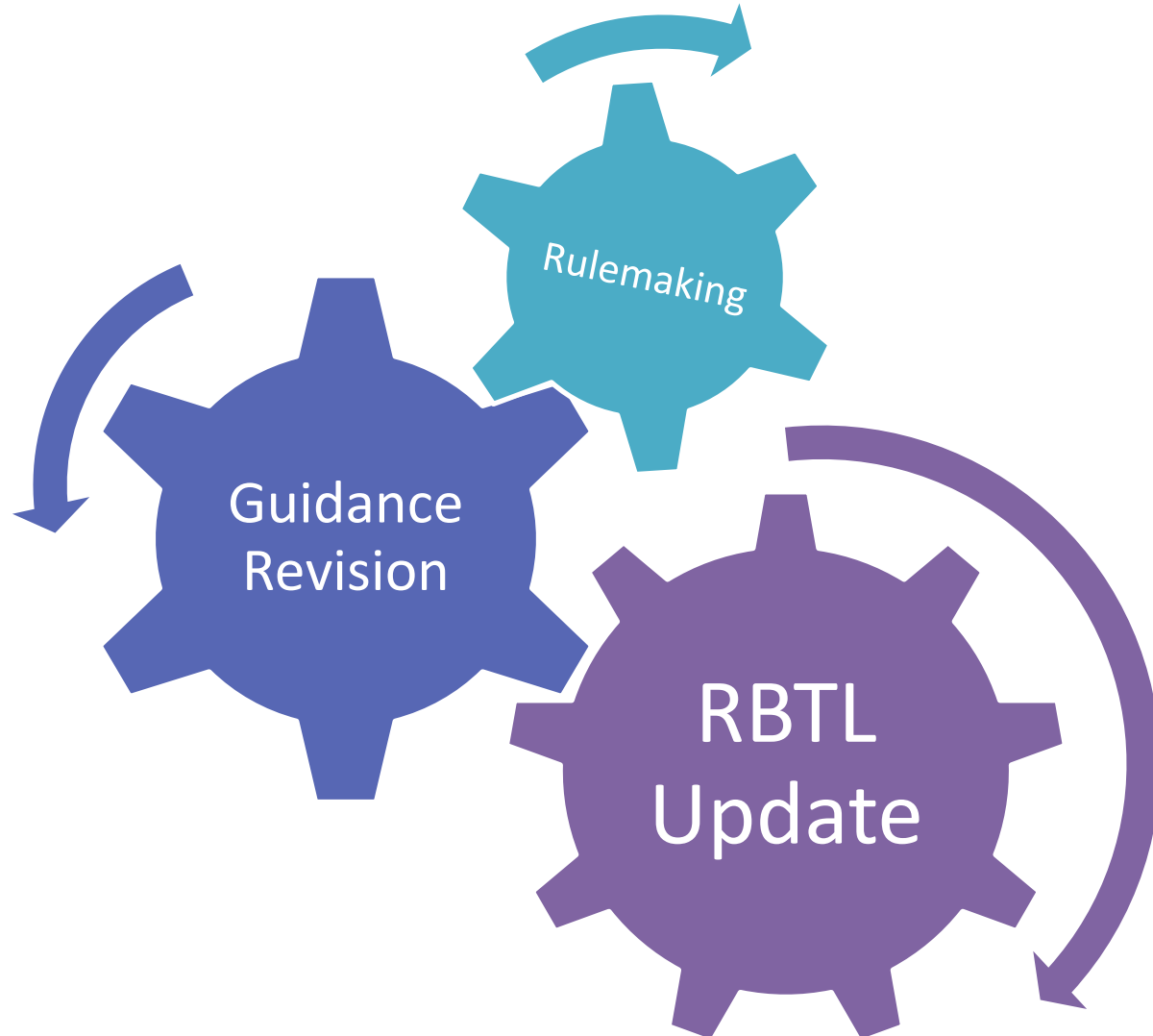
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Brownfields/Voluntary Cleanup Program  
Missouri Department of Natural Resources

REGFORM Hazardous Waste Seminar  
Oct. 18, 2016

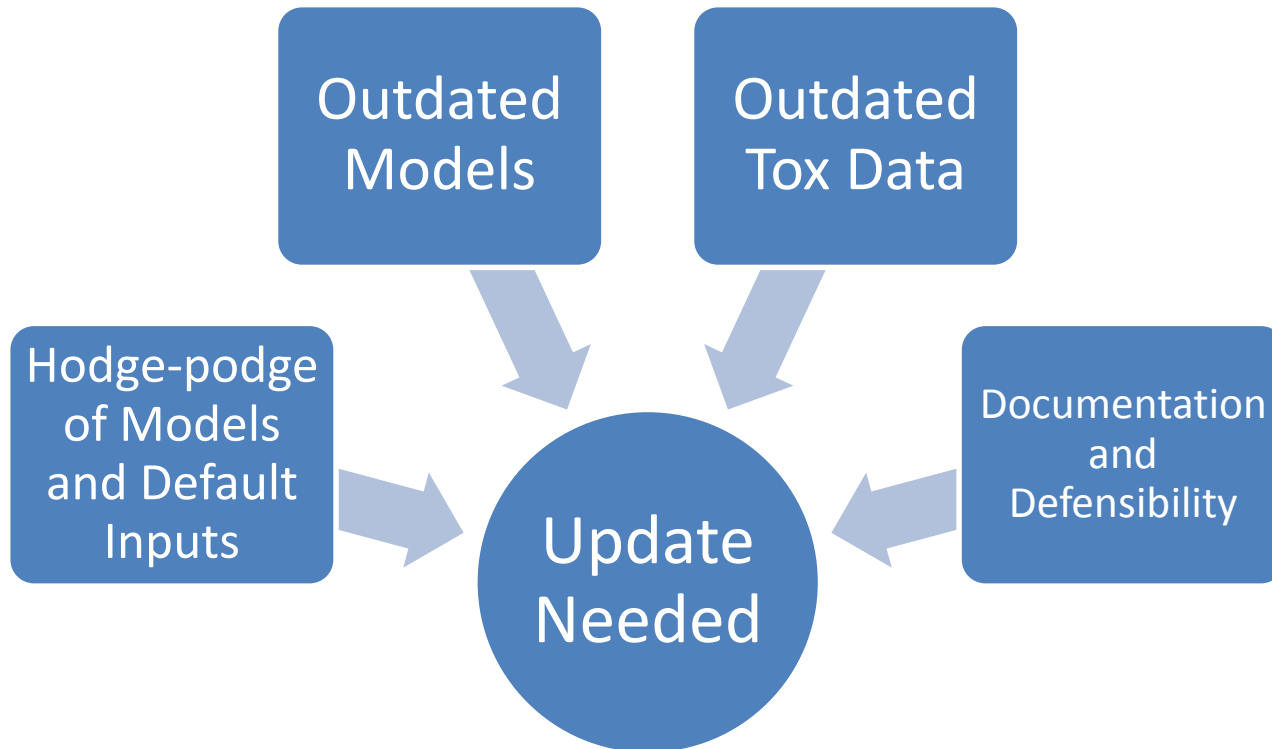


# Moving Parts



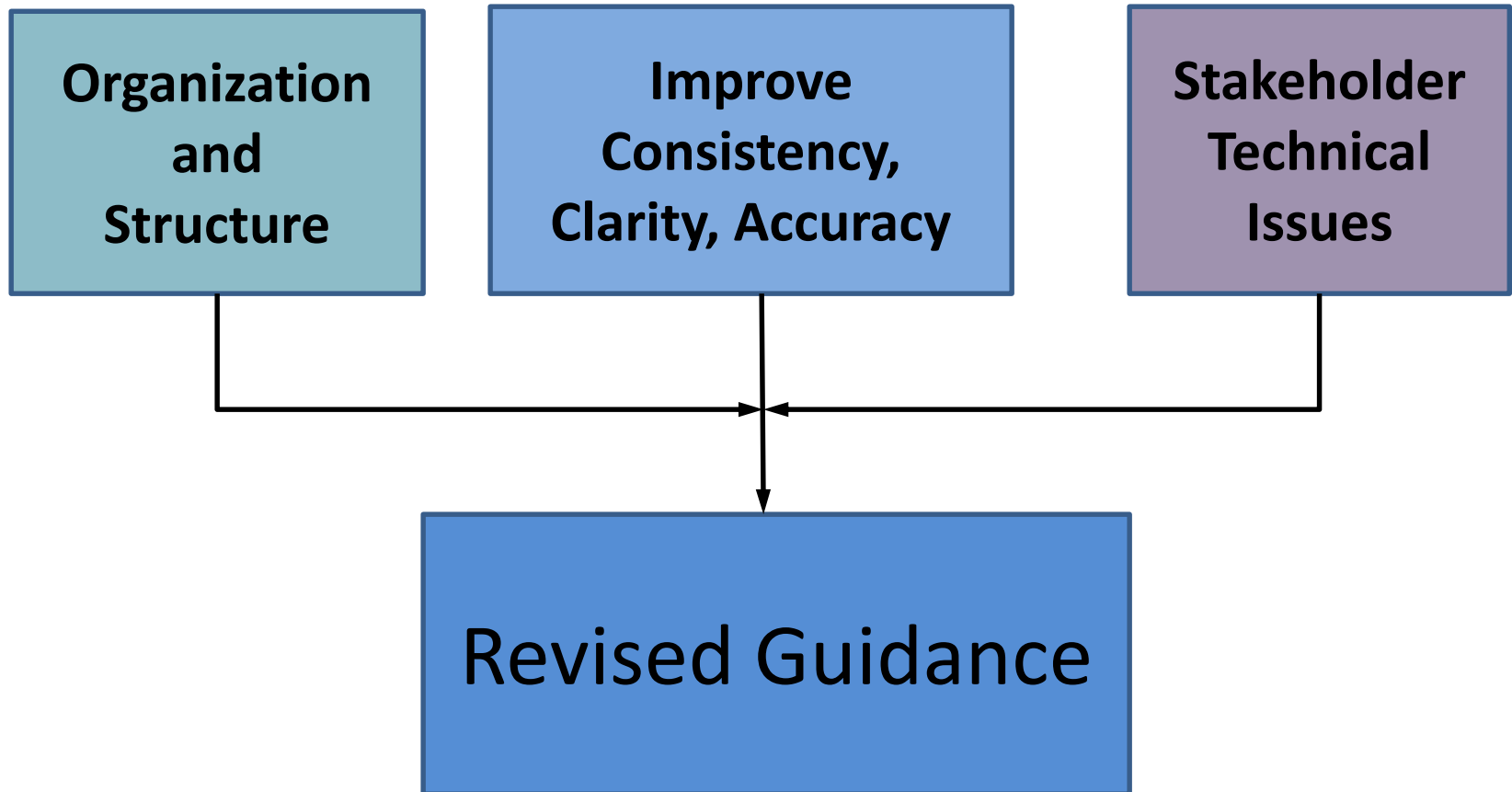


# Need for RBTL Update





# Need for Guidance Revision



# Stakeholder Process Is In Gear

- Formed last fall
- Meetings in December, February and June
- Vapor Intrusion Subgroup – May
- List of Topics
- Plan:
  - Present problems, ideas and proposed approaches
  - Listen to comments, experiences, suggestions
  - Use results to create Revised Draft for review

## Major Stakeholder Topics

- Need for updating Tier 1 risk-based target levels (RBTLs) and guidance document
- Rulemaking issues
- Proposed RBTL Methods/Models
- Vapor Intrusion Assessment
- Interim fix for chlorinated volatile organic compounds (VOCs) (shelved)
- Representative Concentrations
- Delineation Requirements
- Petroleum (total petroleum hydrocarbon [TPH])
- Cumulative Risk

# Topic Focus

## TPH

- EPA regional screening level methods do not quite get us there
- Summing Fractions
- Relative Abundance of Fractions
- New Petroleum Vapor Intrusion Guidance
- Lab methods must be considered
- => Proposed Approach to TPH RBTLs
- Looking at draft info from Department of Health and Senior Services now
- To be addressed at stakeholder group



# Vapor Intrusion Topics

## Screening

Same for all sites?

Leads into next steps

## Site Characteristics

What, When, Where to Sample

How Long to Monitor

## Risk Assessment

Averaging?

Use of RBTLs





## Vapor Intrusion Topics (cont.)

### Remediation

Criteria for  
Mitigation Systems

Post install  
monitoring?

Excavation  
Verification?!

### Post Closure Care

Structuring  
Covenants

Agency role in  
future assessment  
and mitigation?



# Rulemaking

RBTLs/models/inputs incorporated by reference into 2009 Rule [10 CSR 25-18.010]

Rule allows guidance update, limited RBTL modification

Guidance and RBTL changes necessitate rule changes

Significance and scope of proposed changes exceed rule intent

Rulemaking necessary

## Upcoming Events/Schedule

- Stakeholder Meetings – Address remaining topics
- Guidance Revision
  - Currently drafting/internal review
  - Stakeholder Review and Comment – Fall/Winter
  - Public comment (Req'd by MRBCA) – Spring
- Rulemaking – Draft Rule Summer 2017
  - When guidance essentially final

## Getting Involved

MRBCA information, go to:

**[dnr.mo.gov/env/hwp/mrbca.htm](http://dnr.mo.gov/env/hwp/mrbca.htm)**

To join the stakeholder group, go to:

**[dnr.mo.gov/env/hwp/mrbca/stakeholder-signup.htm](http://dnr.mo.gov/env/hwp/mrbca/stakeholder-signup.htm)**

- Include your name, email address, organization name and address, and phone number
- You will receive information about upcoming meetings and activities
- No obligation to attend any or all meetings, but we welcome and encourage participation



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DEPARTMENT OF  
NATURAL RESOURCES

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## For Additional Information

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