

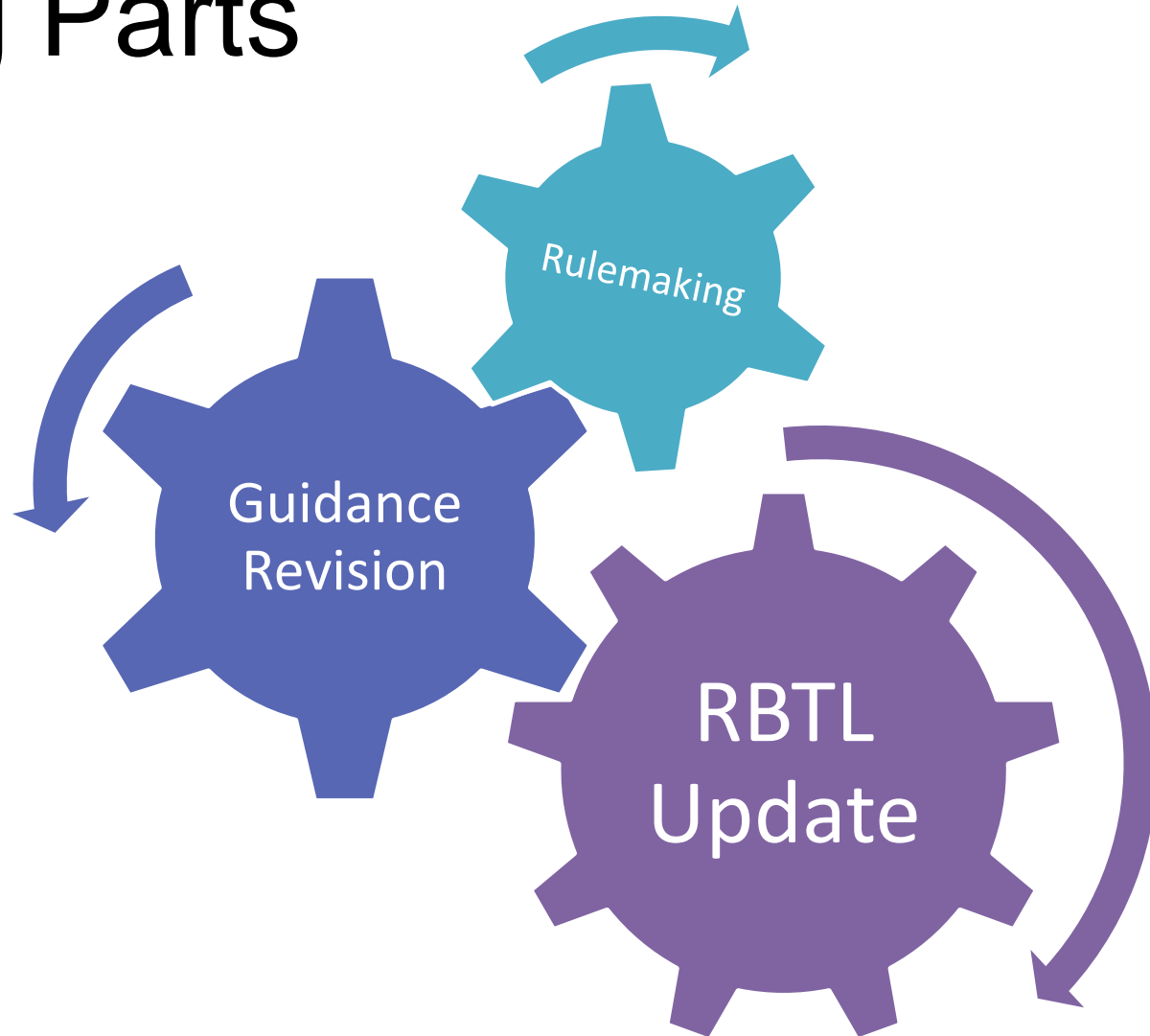
Update on Revision of MoDNR's MRBCA Guidance

Chris Cady, Ph.D

Missouri Department of Natural Resources
Brownfields/Voluntary Cleanup Program

REGFORM MO Hazardous Waste Seminar
November 15, 2017

Moving Parts

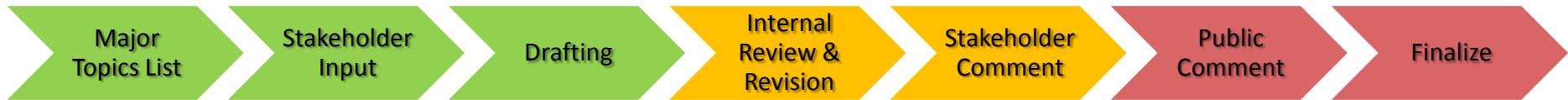


Stakeholder input is Essential

- 20+ Members: MRBCA Users
- Consulting, Industry, REGFORM
- Present problems, ideas, proposed approaches and revisions
- Listen to comments, experiences, suggestions
- Use results to create revised draft for review

MRBCA Revision Status

Guidance Revision



Tier 1 Risk-Based Target Level Tables



Rulemaking

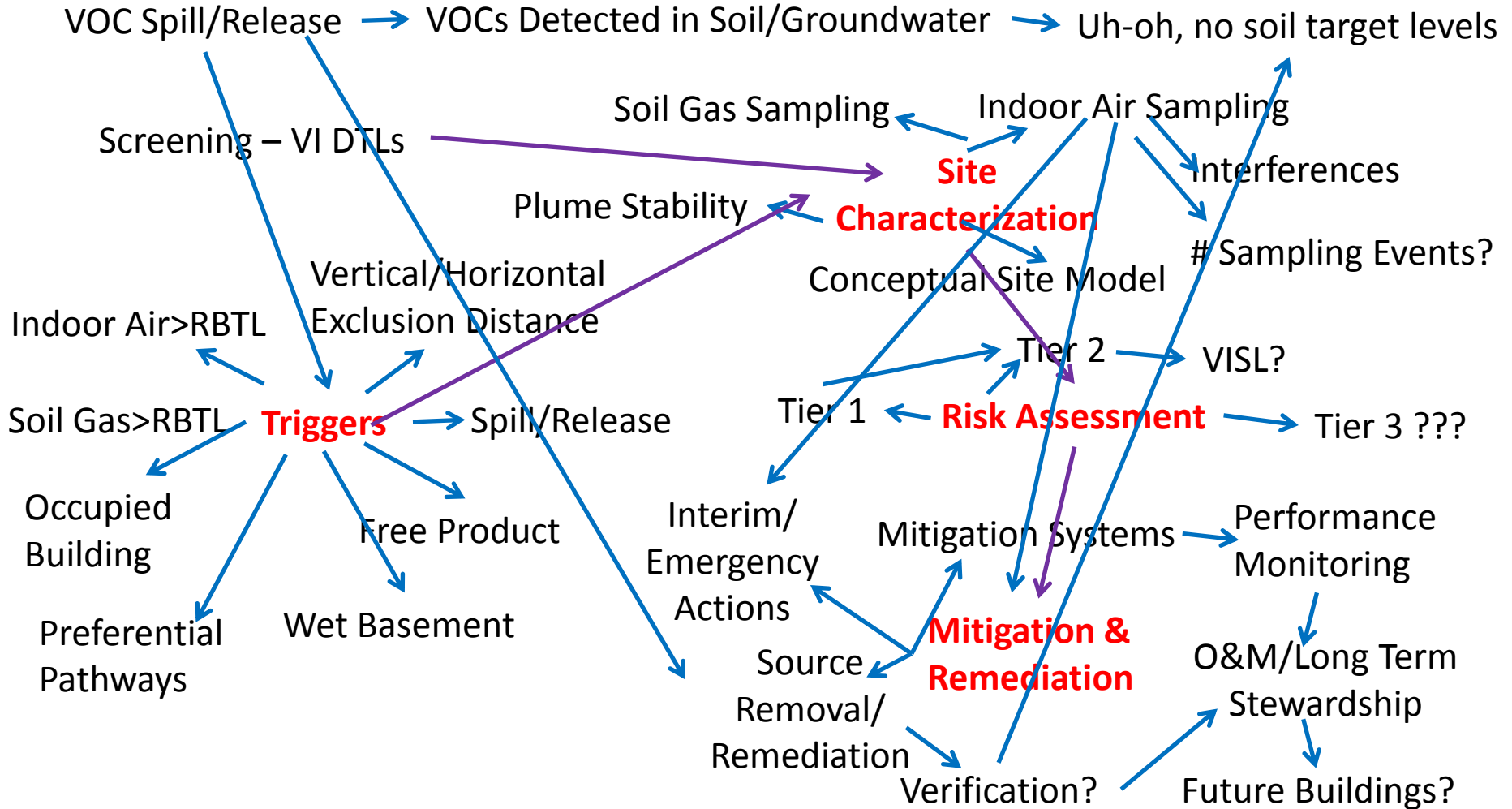


Guidance Revision



- Group has reviewed MoDNR's major topics list
- Provided input
- Initial draft of most sections complete
- Under internal review and revision
- Next: SHG review/comment
- Vapor intrusion sub-group

VI Assessment - Not Linear Process



Vapor Intrusion Guidance Development

*“The first draft of
anything is
meadow-muffins!”*

- Ernest Hemingway

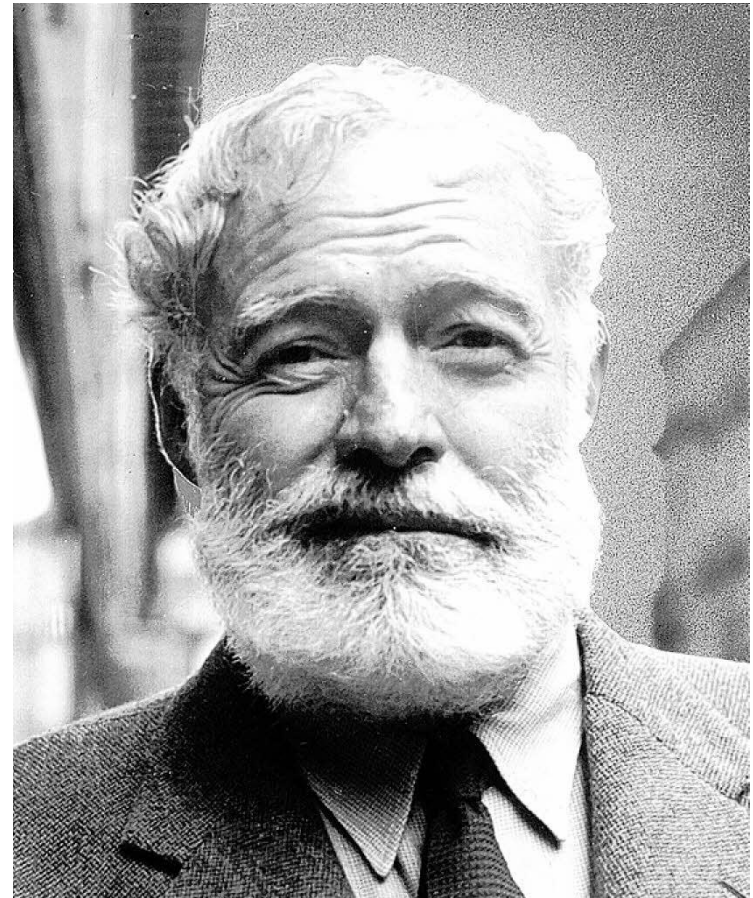


Photo: LOC/Public Domain

Tier 1 Risk-Based Target Levels

Review
Methods &
Models

Stakeholder
Input

Draft Tables
(DHSS)

Internal
Review

Stakeholder
Comment

Public
Comment

Finalize

- Provider: DHSS
- Harmonizing methods and models with RSLs
- Expanded contaminant list
- Special Bits: total petroleum hydrocarbons, Pb, subsurface VOCs/excavation verification
- Draft tables produced
- DHSS writing Apx. E detailing models and methods



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

Rulemaking



- Rulemaking of some kind required even if only to update RBTLs
- Guidance revisions → rule revisions
- Programs other than BVCP?
- Rulemaking to update RBTLs is time consuming

Upcoming Events/Schedule

- Stakeholder review of draft guidance
 - Expect early 2018
- Public comment on draft guidance
- Rulemaking
 - Begin when guidance essentially final

Getting Involved

MRBCA Web Page

<https://dnr.mo.gov/env/hwp/departmentmrbc.htm>

- Download documents
- Sign up for info about upcoming meetings and activities
- MoDNR welcomes and encourages your participation

Tim Chibnall

HWP

573-522-1833

tim.chibnall@dnr.mo.gov

Chris Cady, Ph.D

HWP-BVCP

573-526-8916

chris.cady@dnr.mo.gov