

PCBs at Contaminated Sites New Hampshire



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NEWMOA Workshop 12/5/2012

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Purpose

- Describe New Hampshire approach for dealing with sites contaminated by PCBs
- Identify potential areas for discussion/improvements

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Regulatory Programs

- TSCA – federal program not delegated or otherwise transferred to state
- New Hampshire – (more or less) one cleanup program for many contaminants (Admin Rules Env-Or 600)
 - PCB standards
 - Soil standards (1mg/kg, 10 mg/kg, 25 mg/kg)
 - Groundwater standard (0.5 ug/l)
 - Surface Water (0.17 ng/l – 10 ug/l)

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Universe of programs w/ PCB Sites

- TSCA
- Superfund removal and remedial
- State sites - petroleum and hazardous waste
 - “Low concentrations” of PCBs
- RCRA corrective action sites

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Typical categories

- TSCA Regulated Release
 - State lead (settlements, brownfield, state funded)
 - Work closely with EPA to meet all the requirements
 - PRP lead
 - Often other contaminants present and addressed under state program
 - Role of state can vary (review and provide comments to limited role)
 - Superfund Removal
 - Often other contaminants – make sure transition to post removal work
 - Superfund NPL sites

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Typical categories

- “Low” concentrations of PCBs detected in soil – most common
 - Not always clear what sites require TSCA involvement vs addressed under state program – experience varies
 - Wide range of sites – hazardous sites, junkyards, metal processing facilities, waste oil use or storage, industrial facilities, historic of discharge of mixed liquids (oils/fuels, solvents, waste oil)

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Future Discussion/Improvement

- Improved understanding of TSCA requirements and applicability to contaminated sites
 - State project managers
 - Stakeholders
- Explore options to have TSCA and State programs more efficiently complement one another
 - Universe/work share
 - Improve getting through process when TSCA applies
 - More effective use of existing and future resources

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Questions/contact information

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