

Generic Remedy and Risk-Based Decision Making Cleanups

- A Risk Assessment, or RBDM (Risk-Assessment Decision Making), is a site specific study to evaluate the risk to human health and the environment posed by contamination at a site.

- Exposure pathways are:

Soil → Air → Water

- Contamination at a site must pass each exposure pathway to be considered “cleaned up.”
- A Generic Remedy is simply a more limited risk assessment.

Depending on analytical results, RBDMs:

- May include soil-gas sampling.
- May include a groundwater study.
- Some cleanups may involve soil removal, a risk assessment, a groundwater study and soil-gas sampling or a combination.

All these will increase the cleanup cost accordingly.

The main issue with HOTs is not usually the heating oil, but the constituents or chemicals found in heating oil.

- They always include collecting additional samples and may also require analyzing for volatiles (BTEX) and semi-volatiles (PAH).
- If Naphthalene (PAH) is 6.5 ppm or greater, then soil removal and/or soil-gas sampling will be necessary.
- Analyzing for constituents only has a 14-day window for soil and 7-day window for groundwater samples. Exceeding these time limits will result in having to collect new samples.
- The DEQ requires the removal of any free-product (oversaturation of petroleum in soil, typically over 60,000 ppm).