

The article that will appear in a future RR Report titled “New, “Contained-out” Numbers for PCE, TCE and Vinyl Chloride” is for use by environmental consultants undertaking cleanups for responsible parties, and by Remediation and Redevelopment Program staff.

The article provides guidance on what updated concentrations to use in making contained-out decisions for PCE, TCE and vinyl chloride, as determined from the U.S. EPA Regional Screening Level web-based calculator. This article will replace the “old” values that appeared in a ReNews article reproduced at:

<http://dnr.wi.gov/topic/Brownfields/documents/hazwaste.pdf>.

The new contained-out concentrations for PCE, TCE and VC are to be used in conjunction with RR 705 – “Guidance for Hazardous Waste Remediation”, in making contained out decisions, and the options available and requirements that apply when dealing with cleanup at sites that are or may be contaminated with hazardous waste.

The guidance is created under the authority of ch. 292, Wis. Stats.

The contact person for comments is Judy Fassbender, at Judy.Fassbender@wisconsin.gov.

New “Contained-out” Numbers for PCE, TCE and Vinyl Chloride

Background

EPA’s guidance specifies that while contaminated media is itself not a hazardous waste, it may require management as hazardous waste if it contains a listed hazardous waste. The guidance goes on to indicate that media containing hazardous constituents above health based numbers are considered to contain hazardous waste.

Approximately 10 years ago, DNR developed detailed guidance for addressing situations where environmental media are or may be contaminated with hazardous waste. One of the most useful tools identified in the guidance is the concept of “contained-out” determinations. This concept allows contaminated environmental media to be managed as a solid waste if the contaminant concentrations in the media are below health based numbers. DNR has long relied on EPA web based calculators to determine the appropriate health based numbers for soil.

New “Contained-out” Concentrations

DNR has been transitioning to the new EPA web based calculator and recently evaluated how the new calculator affected the contained-out numbers for 3 of the most common constituents. The table below shows the changes:

<i>Compound</i>	<i>Old Value (ppm)</i>	<i>New Value (ppm)</i>
PCE	33	153
TCE	14	8.8
Vinyl Chloride	0.87	2

For those situations where a Responsible Party has used the old TCE value to develop a remedial action plan for addressing contaminated soil but has not yet formally implemented the project, the Department will continue to allow the old number to be utilized for making the “contained-out” determination. If there are questions on what constitutes “developing a remedial action plan”, contact your project manager to determine which TCE level applies to your particular project.

Other Applicable Requirements

The “contained-out” option addresses contamination from releases of listed hazardous wastes or commercial chemical products. However, contaminated media can also be considered a hazardous waste if it exhibits a hazardous characteristic including ignitability, reactivity, corrosivity or toxicity. The characteristic most likely to apply to contaminated soil is toxicity, which is determined by the Toxicity Characteristic

Leaching Procedure (TCLP). If soil exhibits a hazardous characteristic it may be possible to treat the material so the characteristic is removed. The Department's guidance entitled: "Guidance for Hazardous Waste Remediation" provides more detailed information on the various options available. The document is available at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR705.pdf>.

If you have any questions regarding this information, please contact your DNR project manager or Judy Fassbender at 608-266-7278.