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18-162

September, 2018

NEBRASKA

VOLUNTARY CLEANUP PROGRAM

GUIDANCE DOCUMENT

Produced by: Nebraska Department of Environmental Quality, P.O. Box 98922, Lincoln, NE 68509-8922; phone (402) 471-2186. To view this, and other information related to our agency, visit our web site at <http://deg.ne.gov>.

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Nebraska Voluntary Cleanup Program Guidance

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ABOUT THIS GUIDANCE

Welcome to the guidance document for Nebraska's Voluntary Cleanup Program (VCP). This document has been prepared by the Nebraska Department of Environmental Quality (NDEQ) to provide information and guidance for all persons and parties interested or actively involved in the VCP. It is written for two main audiences: prospective VCP applicants who want to know more about the program and technical staff or consultants who are preparing documents for VCP applicants.

The first section – **Introduction to Nebraska's Voluntary Cleanup Program** – is written for prospective applicants. It provides general information about the VCP and specific information about how to apply. It also outlines the basic process that VCP applicants follow both before and after they are accepted into the program.

The next two sections are written for technical staff or consultants doing work for a VCP applicant. The **Remedial Action Plan Technical Guidance** is intended for use *prior* to entering the VCP. (One of the Attachments to the Remedial Action Plan Technical Guidance includes an important element of this guidance: The **Remediation Goal Lookup Tables**. These tables allow a consultant to quickly determine cleanup levels for a site based on the intended land use. They provide flexibility to the applicant while promoting high-quality, effective, and efficient cleanups that are protective of human health and the environment.) The **Remedial Action Report Technical Guidance** is intended for use *after* initiation of cleanup activities at a contaminated site. These sections describe the information that should be submitted and provide specific information about how to present it. In addition to the narrative, detailed and convenient checklists are included to assist with understanding all of the information that should be provided to NDEQ.

Finally, the **Appendices** and **Bibliography** at the back of the guidance provide examples of specific figures, tables, and other important documents and references to sources of technical information to make it easier for staff and consultants to collect, prepare, and submit the necessary information.

Following the information and guidelines laid out in this document will increase the likelihood of successfully achieving cleanup within a reasonable timeframe and with minimal oversight costs.

WHAT'S NEW IN 2018

The September 2018 version of NDEQ's Voluntary Cleanup Program (VCP) Guidance Document now incorporates what was the stand-alone Protocol for VCP Remediation Goals Lookup Tables (RG Protocol) guidance document to create a single guidance document for the VCP. The revised RG Protocol is now attached to the VCP Guidance Document as Appendix A. The Example Tables and Figures appendix is now Appendix B and the Bibliography to the VCP Guidance is now Appendix C.

Section 1 Introduction to Nebraska's Voluntary Cleanup Program has been revised to accurately reflect process options for a VCP applicant entering the program, including the ability to apply to the program prior to initiating a site investigation and preparing a Remedial Action Plan (RAP) and potential NDEQ review of workplans.

Section 1.1 Process Overview now also includes information on a one-time lump-sum payment to be used for Long-Term Oversight costs at those VCP sites incorporating institutional controls as a remedy component. Section 1.2 RAPMA ELIGIBILITY and Section 1.3 FEDERAL ENFORCEMENT PROTECTION (formerly ELIGIBILITY and PETROLEUM SITE ELIGIBILITY, respectively) have been revamped to clarify these particular areas of interest. NDEQ's negotiated Memorandum of Agreement with EPA Region VII regarding the VCP has been added to the guidance document as Attachment 1-6.

Information has been added to Section 2.2.2.3 Sampling and Analysis Procedures, *Field Sampling Procedures* to note that (1) any VCP site entering the program for which the metal chromium may be considered a potential contaminant of concern (such as a former metal plating facility) should plan on conducting valance-specific (i.e., chromium III and chromium VI) media sampling in characterizing the site, (2) groundwater samples may be collected using passive diffusion bags (PDBs) or Hydrosleeves™ under appropriate conditions, and (3) multiple sampling events should be considered for indoor air/soil gas sampling/evaluation. The *Quality Assurance/Quality Control* subsection of Section 2.2.2.3 has been revised to provide a sampling frequency for field blanks and field duplicate samples of one such sample for every 20 (or less) investigative samples.

The 2018 VCP Guidance has revised the chemical-specific and media-specific remediation goals (RGs) for direct contact exposures from soil and groundwater from the September 2012 RG Protocol based on review of any updated chemical-specific toxicological or other risk assessment information, such as updated exposure factors. In addition, NDEQ has revised its approach to calculating RGs based on the potential intrusion of vapors into enclosed structures for volatile contaminants in soil gas and groundwater to be consistent with current U.S. Environmental Protection Agency (EPA) guidance by utilizing EPA's Vapor Intrusion Screening Level (VISL) calculator. The rationale used to develop these vapor intrusion (VI) RGs is presented in Attachment D of Appendix A.

Information regarding short-term versus long-term vapor intrusion risks related to exposures to the contaminant trichloroethylene (TCE) have been added to the revised RG Vapor Intrusion Lookup Table and Section 5.4 and Attachment F of Appendix A.