

Memorandum

Date: March 5, 2018

To: All Interested Parties

From: Debi Goodwin, UST-LUST Sr. Risk Assessor

Subject: A.A.C. R18-12-263.04 Closure Guidance

The alternative groundwater closure process includes more emphasis on ensuring the closures are protective of both current and future potable water sources. The well survey distance has been extended to 1/2 mile from 1/4 mile. The land use sensitive receptor distance remains 1/4 mile. All closure submittals need to include more detail in the following rule criteria.

Groundwater Plume Stability R18-12-263.04(B)(3)

1. Include present groundwater data that indicates the plume is not only stable but also shrinking
2. If the plume is off-site, estimate how far the plume extends
3. Can Use Mann-Kendall for statistical trend analysis

Natural Attenuation R18-12-263.04(B)(4)

1. Collect geochemical parameters to demonstrate natural attenuation is occurring
2. Can use BIOSCREEN to evaluate the time for the chemical(s) of concern to degrade
3. Provide technical documentation to support natural attenuation

Threatened or impacted drinking water wells R18-12-263.04(B)(5)

1. Discuss why the groundwater contamination left in place does not affect the current potable water source
2. Discuss why the groundwater contamination left in place will not affect future potable water source(s)
3. Discuss the connection between water bearing units to demonstrate that the contamination will not spread to a different unit
4. Discuss why the groundwater contamination left in place will not affect the nearest existing domestic or water supply wells

Other exposure pathways R18-12-263.04(B)(6)

1. Discuss if any remaining soil contamination poses a leachability risk to the aquifer per R18-7-203(B)(1). See the September 1996 GPL guidance.

If you have any questions regarding this memo, please contact me at (602) 771-4453 or at dg1@azdeq.gov.