



TAKING THE MYSTERY OUT OF CLOSING LUST REMEDIATION PROJECTS

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STATE SURVEY

75 questions prepared by workgroup

ASTSWMO LUST Task Force sent out survey

32 States and Territories responded

If your state has not responded, you still have time

STATES COMPLETING THE SURVEY

Arizona

California

Colorado

Delaware

Florida

Georgia

Idaho

Illinois

Iowa

Kansas

Maryland

Michigan

Missouri

Montana

Nebraska

Nevada

New Jersey

North Carolina

North Dakota

Ohio

Oregon

Puerto Rico

Rhode Island

South Carolina

South Dakota

Tennessee

Utah

Virginia

West Virginia

Wisconsin

Wyoming

CATEGORIES OF QUESTIONS

Vapor Intrusion

Groundwater/Surface Water

Vadose Zone Soils

LNAPL/Free Product

Barriers to Closure

Helpful guidance?

RESULTS

Vapor Intrusion

77% allow engineering controls

67% allow technically defensible criteria

63% use one or more of EPA PVI Screening Criteria

47% allow no additional net environmental benefit

RESULTS

Groundwater

97% allow closure if on-site GW below clean-up criteria

83% allow closure if off-site GW below clean-up criteria

77% allow the use of institutional controls

53% allow closure based on mass flux analysis

47% allow no additional net environmental benefit

RESULTS

Vadose Soil

88% allow closure if COCs below cleanup criteria

75% allow the use of engineered barriers

67% have TPH, GRO or DRO closure criteria

53% allow no additional net environmental benefit

RESULTS

LNAPL

60% allow closure if LNAPL is stable

53% allow LNAPL recovery until below a predetermined rate

43% allow no additional net environmental benefit

35% allow individual regulators to determine maximum extent practicable

RESULTS

Barriers to Closure

87% state unresponsive responsible party

71% state rebound of COCs after remediation ends

70% state off-site property access issues

68% state no viable responsible party

58% state staffing shortages

RESULTS

What elements to include in an ASTM Standard?

80% state suggested criteria for closure decisions

79% state best practices for managing orphaned sites

74% state examples or success stories

73% state outreach and training on best practices

71% state periodic review of remedial effectiveness



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