

# GEORGIA REGULATORY PERSPECTIVE

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ASTM E2893-13

Standard Guide for Greener Cleanups

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Response and Remediation Program*

# Outline

- Where we are now
- How the conversation is evolving
- Where we go from here



Former Cattle Dip Vat, St. Simon's Island  
November 2014 Used local soil to backfill excavation

# Response and Remediation Program



- Hazardous Sites Response Act
  - HSRA – State Superfund
  - Corrective Action Plan (CAP)
  - Limited use of UEC
- Voluntary Remediation Program Act
  - Expanded use of engineering and institutional controls
  - Area averaging for soil
- Georgia Brownfield Act
  - Soil cleanup standards = HSRA
  - Purchaser LOL for groundwater
  - Seller retains responsibility for groundwater

# Response and Remediation Program

- Focused on corrective action
- Risk-based cleanup
- Considerations for approving a cleanup method:
  - Effective and feasible
  - Meets cleanup criteria in acceptable time frame
  - Protective of human health and environment
- No specific language or guidance on greener cleanups



Dawson Manufacturing Company HSI#10540

# Sustaining the Conversation

- 2008 HSRA Forum
- 2015 Roundtable



Southern Wood Piedmont HSI# 10043

- + Identified barriers
- + RRP can assist in greening cleanups
- + No policy likely
- + Possible language in comment letters



# Greener Remediation in Georgia

## ➤ Current

- Phytoremediation
- Electrical Resistance Heating (ERH)
- Innovative use of groundwater

## ➤ Proposed

- Constructed wetland



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# Barriers to Greener Cleanup Implementation

- Longer time frame
- Unproven technologies
- Arbitrary interpretation of “green”
- Lack of incentives
- “Doing nothing is the greenest cleanup”



*Your goat ate my phytoremediation!*

# ASTM E2893-13 Advantages

- Best management practices can be applied to any size cleanup
- Can be tailored to site needs and complexity
- Avoids politically charged language





# Summary

- No plans to require use of ASTM E2893-13
- Existing EPD tools to green cleanups
  - Uniform Environmental Covenants
  - Risk-based corrective action
  - HSRA Type 4 RRS and Groundwater Monitoring
- Continuing the discussion

# How can RRP support greener cleanups?

- What drives interest in greener cleanups?
  - Public image?
  - Stewardship?



AKZO Nobel Coatings HSI#10221

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# How can RRP support greener cleanups?

- What drives interest in greener cleanups?
  - Public image?
  - Stewardship?
- Are we impeding greener cleanups?
- What incentives can we offer?
  - Feature your cleanup on our website?



# Guidance – States and Others

| State / Organization | Year      | Type                                 |
|----------------------|-----------|--------------------------------------|
| California           | 2009      | Voluntary Interim Guide / Tool       |
| Illinois             | 2007      | Voluntary Matrix tool / ID BMP       |
| Massachusetts        | 2014      | Regulatory 310 CMR 40.0191           |
| Minnesota            | 2000-2004 | Voluntary Decision Tool Kit          |
| New York             | 2010      | Policy / Reporting requirements      |
| Oregon               | 2011      | Policy / “Encourage” green practices |
| Wisconsin            | 2012      | Voluntary Guidance Manual            |
| Georgia              | 2015      | Roundtable Discussions               |
| ITRC                 | 2011      | Tech (May) Regulatory (November)     |
| ASTSWMO              | 2008-2009 | Workgroup / Guidance                 |

Not an exhaustive list



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