

Errata:

Please note that changes were made in the following paragraph of the cover letter, Question and Answer No. 13, and the 2/10/97 Delineation IOM:

At this time, tank owners and operators should pause on work in progress and have their Corrective Action Specialist review the information available on their cases and determine whether the delineation and closure criteria are met for each LPST case using the new criteria. Site closure requests should be submitted on cases which meet the closure criteria. Any proposal for the next appropriate step on cases that do not yet meet the closure criteria should incorporate these guidelines. The TNRCC will also utilize these guidelines as it issues approvals or direction for further work. *Please note that work done after **April 11, 1997** that does not conform to these new guidelines may be at risk for reimbursement eligibility.*

13. Q. My Corrective Action Specialist has already started work on the Plan B report. Should I direct them to finish the report? If not, how much will I be reimbursed for the work already completed?

A. The criteria set forth in the attached documents should be used to evaluate the case and determine whether completion of a Plan B is necessary. Once it has been determined that the Plan B is needed, the report should be completed and submitted. If the determination is made that a Plan B is not needed (i.e., all pathways are closed through the closure criteria evaluation), then work on that evaluation should end immediately or no later than **April 11, 1997**. In the instance when certain pathways cannot be closed under the closure criteria, then the completion of a Plan B should focus on those pathways.

Reimbursement will be provided for necessary activities accomplished on eligible sites. In the case of incomplete Plan B evaluations, reimbursement will be made on the work completed up to **April 11, 1997**. Documentation of the work completed must be submitted with the application for reimbursement, including copies of all completed components of the Plan B report. Please do not submit partial reports to the RPR/RPI Sections. Partial reports will be used only to accompany reimbursement applications to document the amount of work done prior to **April 11, 1997**.

Correction for 2/10/97 Delineation IOM

Please note that this page of your IOM has changed. Line 1 of table should read “Existing water supply well within **1200** feet of source area” instead of 500 feet.

Chet

Groundwater Plume Delineation Criteria

	Groundwater Scenario	Delineation Extent
1	Existing water supply well within 1200 feet of source area.	Define to POE; or to 1 order of magnitude less than Plan A Category I level or PQL, whichever is greater concentration. Verify plume stability.
2	Priority 3.5 or local supply, or 0.5 mile water well survey indicates an existing water supply well downgradient beyond 1200 feet	Use modeling to project concentration at 1200 feet. Confirm stable or declining trend. Modeling result should not exceed Plan A Category I concentrations.
3	Probable future groundwater use within 500 feet	Define to Plan A Category I levels. Verify plume stability.
4	Surface water within 1200 feet downgradient of source	Define to POE, or to surface water criteria. Modeling evaluation could be conducted to demonstrate protective concentrations at lesser distance. Verify plume stability. (If plume defined to Plan A Category I levels, further delineation may be unwarranted unless judge potential for impact to surface water.)
5	Groundwater \leq 15 feet deep or within typical construction depth and existing utilities within 500 feet of source	Define to concentrations protective for construction worker exposure. Verify plume stability.
6	Groundwater \leq 15 feet deep or within typical construction depth and likely future utilities within 500 feet of source	Define to concentrations protective for construction worker exposure. Verify plume stability.
7	No existing receptors within 1200 feet of source and no likely future receptors within 500 feet of source.	Accept delineation to Plan A Level Category III level as adequate. When plume is not defined to Plan A Category III criteria, then sufficient downgradient definition should exist to show declining concentrations with distance from source. When maximum on-site concentrations exceed Category III levels, verify plume stability.
8	Fractured Bedrock or Karst Environments	Focus primarily on protection to receptors (possible monitoring likely receptors). Delineation should be attempted to Category I levels (unless an unused source), and abate source area as possible.
9	Other Exposure Pathways (groundwater to indoor air, explosive concentrations).	When these issues are of concern at sites, then delineation to protective concentrations for these pathways should occur.

Criteria for Likely Future Receptor:

Groundwater Use:

Priority 3.5 or local water supply (Note: local supply is indicated if water well survey indicates routine use of the affected groundwater body)

No Prohibitions on Use

Residential Area, particularly rural

Absence of municipal supply

Assume 5 year benzene half life.