

PCB MOA Guidance Revisions Comments

Comment	Commenter	Response/Assignment
<p>1. In the introduction to the three categories of PCB sites, consider adding a clarification up front that only Type C sites are covered. Also consider clarifying sediment site applicability as the initial listing removes sediment sites from applicability and then for Type A the example of the site not eligible is the Fox River. If not reading this close enough you may assume that other sediment sites are Type C and are covered by the guidance but complex ones are not. However, I read the intent as saying any PCB sediment site is not covered. (I think they should be but apparently that is not the deal with EPA.) Also what about a partial soil and partial sediment site. Does this mean it would not apply to the sediment portion or the entire site, both upland and sediment. What if the sediment portion is marginal? And of course the current efforts to better define as soil versus sediment comes into play.</p>	<p>Mark Thimke</p>	<p>Type A, B and C sites and how they are defined are discussed in the MOA with EPA and the guidance, so they are “included”. The important distinction is Type C sites are eligible for the Coordinated Approval process.</p> <p>It’s correct that sediment contamination is defined as Type A and is not eligible for the Coordinated Approval process. If the site is a combination and the soil and sediment portions must be dealt with together when the site is remediated, then the whole site would be a Type A and not be eligible for a Coordinated Approval. It may be possible to split off a soil portion if it isn’t related to the sediment and possibly manage that portion as a Type C site and be eligible for a Coordinated approval. This clarification has been added to the guidance.</p>
<p>2. Contaminated building materials – is that a slab? If so, suggest being much more specific as the slab is often a big question mark. A clear definition of building material would be helpful.</p>	<p>Mark Thimke</p>	<p>A building foundation, basement wall(s), on-grade slab that is impregnated with PCB contamination is considered contaminated building material and not environmental media. This clarification has been added to the guidance.</p>
<p>3. Page 7, the new addition language, I am not clear what is “a condition causing or about to cause”... such that NR 700 applies. Is run off from a slab such a condition? And how does NR 700 interplay with the other regulatory</p>	<p>Mark Thimke</p>	<p>This has been added to the guidance: Examples include PCB contaminated paint that is flaking onto soil and PCB oil or coolant saturated surfaces that are shown by sampling or through visual observation of oily runoff to be directly contaminating soil, surface water or sediments.</p>

<p>requirements. Some examples for added clarity would be helpful</p>		
<p>4. PCB background – is there a state recognized background value? If so, let’s state it in the guidance. How does that fit with a .22 ppm cleanup value on an Aroclor basis?</p>	<p>Mark Thimke</p>	<p>There is no state recognized background value for PCBs.</p>
<p>5. RCL’s – NR 700 allows for site specific variation of the table RCL. I suggest making it clear in Section 6, the RCL is not necessarily a table look up value.</p>	<p>Mark Thimke</p>	<p>Section 6 refers to attachment 5a, and indicates what is outlined in the attachment is the “recommended” approach, e.g., using the EPA SSL spreadsheet. Attachment 5a calls this the “normal” approach. This has been revised to be consistent with Section 6 and states it is the recommended approach.</p> <p>The introduction to attachment 5a states: “In accordance with ch. NR 720, a RP may propose a different approach than outlined here on a site specific basis.”</p> <p>We have added that language to Section 6 – a site specific approach may be proposed.</p>
<p>6. I understand the generic RCL is by Aroclor. I think this is a topic to be revisited especially since Aroclor identification is more an art than science. PCBs that are being remediated from historic spills are often weathered and what the original Aroclor was is very uncertain and often left to the best guess of the reader of the lab graph. I do not believe standards based on Aroclors is the best way to go and as a member of the NR700 Advisory Committee this is one of those details we missed and needs to be further considered and corrected.</p>	<p>Mark Thimke</p>	<p>Full congener analysis is best. So, we agree with this comment, however cost of analysis is an issue. Aroclor analysis (Method 8082 where a small subset of congeners is analyzed) runs about \$100 (or even less); but a full congener analysis (Method 1668) runs about \$1,000 or 10x as much. This is the main reason why most PCB studies is “Aroclor-based” and total-PCBs is equated to sum of Aroclors, even when the best estimate is sum of congeners. The table in the guidance is set up, so that if either Aroclors or congeners are analyzed, there will be RCLs for them. Currently, while option to analyze for Aroclors is allowed ordinarily, a full site risk assessment, if required, will normally require analyzing for congeners (all 209 of them).</p> <p>There may be a 3rd option for total-PCBs: via in-house lab (or lab-modified) Method 8270-SIM that is offered by labs like TestAmerica. This lab service is very new, so we don’t know how it’ll perform relative to Method 8082, but this option (to use modified 8270-SIM)</p>

		may be approved to get total-PCBs, and if proven to be as good or better than sum of Aroclors, this may be the protocol for the future. It has been noted in the guidance that this method may be considered on a case-by-case basis as an alternative to full congener analysis.
7. Page 9 – Reference to non-Type A sites seems to be cryptic way of saying Type C sites? – the only type of site where the policy applies.	Mark Thimke	TSCA isn't applicable to Type B sites. It's possible some Type A sites may be able to use the self-implementing approach depending on their characteristics, but that may be the exception. Most Type C sites probably can use the self-implementing approach. This has been changed to read: The TSCA self-implementing cleanup procedures can only be used at sites with certain characteristics. It's expected that they may be used at most Type C sites. The procedures may not be used to clean up surface or ground waters, sediments in marine or freshwater ecosystems, sewers or sewage treatment systems, drinking water sources or distribution systems, grazing lands or vegetable gardens etc. (see also 40 CFR 761.61(a)(1)).
8. Page 10-11—Does not the NR 700 RCL drive the cleanup? The guidance seems to say you can cleanup to 10 ppm or even 100 ppm. I understand the intent is to illustrate the use of the federal approach but presumably the more stringent of state or federal applies. Without further explanation there could be PRP confusion.	Mark Thimke	Although the NR 700 RCLs for unrestricted closure are more restrictive than the TSCA self-implementing level, it may be possible to conduct a cleanup that leaves PCBs at levels of 10 or 100 ppm using a cover and meet both NR 700 and TSCA requirements. This is described on page 8 and in Attachment 5a. Section 6 describes those options as well for sites that meet the TSCA self-implementing regulations.
9. Page 12 – Risk Based approach. Since the Department does not have risk assessment expertise, is all of that work is done by EPA? Suggest the guidance note how risk assessment is handled and by whom.	Mark Thimke	The EPA TSCA risk based approval process isn't the same as a risk assessment. A human health as well as an ecological risk assessment may be prepared as part of the EPA TSCA risk based approval, if necessary, as outlined in Attachment 6. Type C sites undergoing a Coordinated Approval that choose a risk based approval approach are required to have their approach approved by both Agencies. Prior approval from DNR to conduct a risk assessment in accordance with NR 722.11 would be necessary and the risk assessment reviewed and accepted by DNR before EPA would be asked to consider it. This has been added to the discussion on risk based approvals in the guidance.
10. Page 13 – I assume EPA will not allow GIS? I	Mark Thimke	EPA Region 5 Superfund management has indicated informally they

<p>thought Tom Short was about to allow it for Superfund site. Can we get the same treatment of TSCA sites and use GIS.</p>		<p>would be willing to accept placement in the DNR Database (GIS Registry) in lieu of a deed instrument at sites with new decision documents (RODs) being prepared going forward, but have yet to provide a formal written acceptance. The understanding with Region 5 TSCA staff when the MOU and subsequent guidance was prepared is deed instruments, if required under TSCA, would normally be obtained. If there is a site undergoing a coordinated approval where the RP is unable to obtain a required deed instrument, and there is a good reason why they can't, the Department is willing to discuss using the DNR Database entry as a substitute with EPA, provided all other requirements are met. This has been added to the guidance.</p>
<p>11. Page 14 – GLC Letters – Why are these letters not coordinated as well? If the intent is One Cleanup Program it should be extended to Liability Clarification letters was well.</p>	<p>Mark Thimke</p>	<p>As stated in the guidance, the suggested language is only for sites where TSCA applicability is uncertain. Otherwise, all the requirements apply, including TSCA cleanup. Type C sites that seek a GLC letter can use the Coordinated Approval process. This clarification has been added to the guidance.</p>
<p>12. Attachment 1 - Confusion as I read it as to whether Type A in or out of the memo. From the main body I read Type A automatically out. If so, why the additional language about Type A. Maybe I am missing something but this could be a source of confusion.</p>	<p>Mark Thimke</p>	<p>Type A, B and C sites and how they are defined are discussed in the MOA with EPA and the guidance, so they are “included”. The important distinction is Type C sites are eligible for the Coordinated Approval process.</p>
<p>13. Attachment 1 - What is an “unreasonable risk of injury” versus a reasonable risk of injury. Since remedies generally are not risk assessment based under NR 700 not sure how one makes that call. The key here seems to be that there must be an affirmative finding of “unreasonable risk”. This term should be defined or illustrated by example.</p>	<p>Mark Thimke</p>	<p>Attachment 1 outlines the MOU site classifications, e.g., Type A, B and C sites and the regulatory criteria EPA will use to confirm them. This term is in the MOU and comes from TSCA regulations. Under the MOU and the guidance, when DNR is notified of a PCB site, EPA is then sent the notification information and an attempt is made to classify the site based on known information. EPA then confirms the classification based on the criteria in their regulations and the MOU. Given the language is TSCA based, we asked EPA Region 5 for examples and they responded by citing language beginning on page 35401 in the Preamble to the June 29, 1998 FR final disposal of PCBs rule. This language includes “unreasonable risk of exposure” to PCBs. We believe this decision is based on the conditions at a site, including</p>

		how easily exposure could occur, how far the contamination has migrated into the environment, how easily the contamination can migrate further into the environment and the concentrations present. A note has been added to the guidance stating this.
14. Attachment 1 - And Type C says one must meet the criteria of a finding of unreasonable risk. But if the Type C site presents an unreasonable risk, is it not a Type B site? Clarification of intent as to what is Type B and Type C would be helpful. Perhaps some examples to show the difference?	Mark Thimke	The language in question is for a site that would not be TSCA regulated unless there is a finding of unreasonable risk. If there is such a finding, it would be TSCA regulated and could be a Type C site.
15. Attachment 5 - No reference to averaging is made even though allowed under the new revisions to NR 700. Averaging is not risk assessment and should be separately called out.	Mark Thimke	A mention of the results averaging option in the rule has been specifically added to the guidance; we are working on separate guidance at this time for how to average soil sampling results.
16. Attachment 5 - While risk assessment is noted, I understand the Department lacks any risk assessment capabilities in house. That being the case the guidance should be more specific as to how risk assessment review would be achieved. Also, if a fee item, that should be noted. And if risk assessment is used can VPLE still apply?	Mark Thimke	See the response to comment 9, above. If prior approval for preparation of a risk assessment is granted, then that would normally be included in the Remedial Action Options report, and the appropriate fee for that report would be required. The response to comment 9 applies to VPLE sites.
17. Attachment 5 - I do not believe 0.22 ppm is mandated by NR 720 in all instances yet the table in this attachment implies that is the case. NR 720 allows site adjustments, which result in increases in the cleanup value short of a full risk assessment and that is not noted in the table.	Mark Thimke	The values in the table are for “unconditional” closures. So while site-adjustments are allowed, the conditions for those site-adjustments – when approved by the DNR for closure – must be noted in the GIS Registry packet.
18. I know you will be receiving comments on the PCB guidance today. And as member of the NR 700 group I received inquiries as to how	Mark Thimke	See the response to comment 6.

<p>did we get to an Aroclor based PCB regulatory scheme. My answer is, I do not recall the Advisory Committee ever discussing it or in any detail. That being the case, I think the shift from a total PCB approach to an Aroclor specific approach was an unintended consequence of using the EPA Region 9 SSL default values and should be revisited. As a short term fix, I suggest using the flexibility allowed in NR 700 (site –specifics) so that a remediation value based on total PCBs can be used at complex sites. I also suggest a rule cleanup package to address unintended consequences, such as this, arising from the new rules.</p>		
<p>19. As proposed here, it appears that a responsible party may need two approvals for a lot of cleanups rather than one, which I do not believe was the intent.</p>	<p>Brian F. Bartoszek, WPS</p>	<p>TSCA can't be delegated to a state for implementation, so TSCA regulated sites require 2 approvals, although Type C sites that are approved for and follow the Coordinated Approval process will have DNR as the lead decision making Agency. Non- TSCA regulated sites (Type B) only require a DNR approval.</p>
<p>20. Regarding old spills where the source concentration is unknown and the as-found concentration in soil is <50 ppm PCB; EPA's perspective is that the PCB regulations and associated cleanup requirements are not applicable to these spills. On Page 5, third bullet, it states that the site is regulated if the date of release or concentration is unknown, which is not correct if the concentration is <50 ppm. Later, the first question in the Q&A section (Attachment 3) contradicts this, and states/implies that post 1978 spills with <50 ppm in soil are not regulated under TSCA, which is correct. WPS finds this language</p>	<p>Brian F. Bartoszek, WPS</p>	<p>Both are correct in the guidance. The third bullet on page 5 is a summary restatement of the TSCA regulations. Those regulations do say that if the date of the release and the concentration is unknown, it is assumed to be regulated. It is also true that EPA can make a case-by-case determination at such sites where a good faith effort has been made to determine the date of the discharge and the concentration, and the as-found concentrations are considered de-minimum.</p>

<p>confusing and would like the Department to clarify.</p>		
<p>21. Attachment 5b states that soil samples should be analyzed for all nine Aroclors, but it indicates (top of Page 5) that WDNR would “expect” you to analyze for and sum all 209 congeners if you are conducting a risk assessment. That’s expensive and seems excessive, particularly since a lot of the IRIS “look-up” numbers that go into risk assessments are based on Aroclors. WPS is not aware of this previously being a requirement; please clarify whether and why it’s required.</p>	<p>Brian F. Bartoszek, WPS</p>	<p>A risk assessment, if done using Aroclors only, will be very incomplete. So, the guidance contains the expectation that congener analysis will be done.</p>
<p>22. Wis. Admin. Code § NR 720 provides flexibility by allowing responsible parties to either use a "generic" approach relying on default assumptions or site-specific cleanup levels based on the particulars of a site, the nature and extent of the contamination and other relevant site-specific factors. It is a hallmark of the NR 700 rules that responsible parties are allowed to determine which approach is more cost effective in addressing site conditions and redevelopment of the site. Clarifying the guidance so as not to appear to "down play" one approach over the other is important in maintaining the flexibility inherent in the NR 700 remediation approach. More specifically, references to "normal approach" tend to favor the generic approach over the use of the equally valid site-specific method. We understand the word choice was intended to refer to the generic method, but</p>	<p>Craig Dousharm, Mercury Marine</p>	<p>Section 6 refers to attachment 5a, and indicates what is outlined in the attachment is the “recommended” approach, e.g., using the EPA SSL spreadsheet. Attachment 5a calls this the “normal” approach. This is revised to be consistent with Section 6 and states it is the recommended approach.</p> <p>The introduction to attachment 5a states: “In accordance with ch. NR 720, a RP may propose a different approach than outlined here on a site specific basis.”</p> <p>We have added language to Section 6 that is similar – a site specific approach may be proposed.</p>

words like "normal" carry unintended meanings when read by the general public. We recommend the guidance point out the basis for the generic values and that, as generic or default values, these remediation criteria are very conservative. The use of the generic approach as remediation criteria at sites with confined, limited contamination may be a cost effective method. However, at a complex site, a site-specific approach to developing a remediation standard may be the preferred path.

The distinction between generic conservative remedial values and flexible site-specific approaches is reflected by the Department's choice to use U.S. EPA's soil screening levels ("SSL") as the generic/default remediation values. U.S. EPA specifically noted:

- SSLs are not national cleanup standards, and exceedances of SSLs do not trigger the need for response actions at NPL sites.
- EPA recognizes, however, that certain conservative assumptions built into the generic and simple site-specific approaches to SSL development, while appropriate for a screening analysis, may be overly conservative for setting PROs and ultimately, site cleanup levels.

Thus, SSLs (which are the equivalent of NR 720 default/generic values) may be cost effective for responsible parties in certain circumstances but certainly not all as recognized by the SSL itself. In order to avoid

<p>misunderstandings, the guidance should clearly note the two approaches. It should also do so in a manner that does not necessarily favor one approach over the other.</p>		
<p>23. The table in Attachment 5a needs clarification. The table lists individual Aroclors and also a category "Polychlorinated Biphenyls (high risk)." How does this latter category match with the Aroclor specific values found in the table?</p>	<p>Craig Dousharm, Mercury Marine</p>	<p>Aroclors are trademarks. Not all PCBs come from Aroclors. If the laboratory can't match sample chromatogram to any Aroclor, but is certain that soil sample contains PCBs, the quantitation of those non-Aroclor PCBs should be compared to PCB (high risk) RCL.</p>
<p>24. The change from a total PCB cleanup value to an Aroclor specific value is a substantial change from the Department's past practice of relying on a total PCB remediation value. This change is an artifact of the use of the U.S. EPA-Region 9 SSL tables. As a default value, it may be appropriate to use the conservative SSLs based on distinct Aroclors, but for complex sites, relying on site-specific factors using an Aroclor-based approach adds little or nothing to the overall environmental protection. However, it does add substantial cost and complexity to the analysis. Since a site-specific approach allows for consideration of a variety of factors, the Department should use its flexibility to develop site-specific remediation standards on a total PCB basis, not Aroclor specific. Doing so would make the TSCA and NR 700 approaches consistent and much less confusing and expensive to address.</p>	<p>Craig Dousharm, Mercury Marine</p>	<p>See the response to 6.</p>
<p>25. Attachment 5b addresses sampling on an Aroclor specific basis. For complex sites where</p>	<p>Craig Dousharm,</p>	<p>"Fresh" Aroclor sample is one thing, but typically the "weathering" process would have already affected the original PCBs that were</p>

<p>substantial sampling is conducted, the Aroclors are known and to require a full range of Aroclor sampling is unnecessary and inconsistent with the overall cost effective approach of NR 700.</p> <p>We believe that the language should be modified to recognize that many complex PCB sites undergo comprehensive sampling programs, and that at many of these sites only one or two Aroclors are ever quantified; the remaining 5 to 6 Aroclors are consistently non-detect. The language should be modified to explicitly recognize that adding additional Aroclors to future sampling programs at these sites will likely result in no new information and will not improve decision making. Further, the complexity of the Aroclor sampling combined with the confusion in the use and appropriateness of the table in Attachment 5a calls for a reappraisal of the Department's approach to PCB remediation. At complex sites, a total PCB approach should be recognized, and specific guidance should be developed to recognize such an approach.</p>	<p>Mercury Marine</p>	<p>released in the soil. The effect of weathering in soil is a higher bias on heavier, less-mobile PCBs, so say, analysis of an original Aroclor-1242 released in soil, upon weathering, may appear to better match Aroclor-1260. If Aroclor-1260 isn't analyzed for, the result could be no detect for Aroclor-1242.</p> <p>Cost to analyze for 9 Aroclors is about same as fewer Aroclors. In fact, labs will typically choose to match 2 Aroclor endpoints, such that they will usually get a good match with a combination of 2 endpoints. So to make sure that the heavier PCB congeners (in Aroclor 1268, for instance) aren't ignored, comparison-matching with the rest of analyzable Aroclors should be done.</p>
<p>26. Wis. Admin. Code s. NR 720.07 allows averaging of sample values is an appropriate method for determining compliance with the NR 700 soil standards for direct contact. More specifically, the note in NR 720.07 recognizes the averaging practice previously employed by the Department at complex sites. The guidance should address the availability of averaging in a more prominent manner so that those not familiar with the details of the</p>	<p>Craig Dousharm, Mercury Marine</p>	<p>A mention of the results averaging option in the rule has been specifically added to the guidance; we are working on separate guidance at this time for how to average soil sampling results.</p>

<p>NR 700 process understand that averaging is a recognized technique for determining if a site meets the NR 700 direct contact standards.</p>		
<p>27. The current guidance for PCB remediation under the One Cleanup Program MOA acknowledges that PCB contamination may be identified that does not fall under the applicable requirements of the NR 700 rule series environmental pathway but is subject to TSCA cleanup regulations, specifically contaminated building materials. The guidance further indicates that for these types of materials the Responsible Party is responsible for coordinating directly with the USEPA and meeting both TSCA disposal and NR 500 series in-state disposal/management requirements. Accordingly, the disposal and management of PCB contaminated building materials are excluded from the USEPA/WDNR coordinated approval process. However, Brownfield sites with multiple contaminant sources would benefit from a formal, integrated communication between the USEPA and WDNR. The Draft Revisions do not adequately address these issues. Proposed topics for additions to the draft guidance for management of building materials include:</p> <ul style="list-style-type: none"> • A framework for future communication between the USEPA, RR Project Manager and Responsible Party with regards to: <ul style="list-style-type: none"> ○ Review of sampling strategies (e.g., discrete for vs. composite sampling strategies) for 	<p>Karen C. Dettmer, for the BF Technical Subcommittee</p>	<p>The RR Program’s limited resources don’t allow us to take on all the responsibilities outlined here for materials management that is outside NR 700 regulation.</p> <p>The guidance has been revised to discuss on-site management of solid waste under s. NR 718.15. On-site management of building materials and other non-soil solid waste may be conducted under s. NR 718.15. This may allow the on-site redispal of some building materials to be managed by the RR Project Manager under the NR 700 cleanup process. There are currently no comprehensive guidelines for implementing this rule for contaminated materials – those may be developed later and consider the specific issues listed in this comment. One guideline that is added is what’s stated in the draft NR 718 construction and utility guidance that the criteria in s. NR 718.12(2) for on-site redispal of soil can be considered. Also, the RR Project Manager can request assistance from other technical staff and DNR Waste and Materials Management staff for s. NR 718.15 decisions.</p> <p>The guidance already outlines on page 6 a recommended project team approach for larger redevelopment and other similar projects where PCB contaminated building material will be managed. The team could include DNR Waste and Materials Management and EPA TSCA staff to coordinate the issues listed.</p>

<p>delineation of PCB impacted media that may be reused as fill or allowed to remain on-site.</p> <ul style="list-style-type: none"> ○ Identification of a point of contact either through the RR Project Manager or other identified person(s) in the RR program that can serve as a resource to support continuity and transparency through the NR 700 process. ○ Guidance on when a Responsible Party should consider engaging the RR Project Manager for assistance with managing PCB impacted building materials. ○ Guidance on how to assess building materials that is causing or could potentially cause a discharge. Further clarification on how building materials fit under the MOA (e.g., comingled PCB impacted material with soil). ○ Guidance on potential future liability for on-site management of PCB impacted media with respect to seeking closure. ○ Guidance on where building material management issues (e.g., reuse of material as fill, material to be left –in-place) overlaps between the RR and the waste program. 		
<p>28. Proposed Language for Inclusion with the Guidance Document</p>	<p>Karen C. Dettmer, for</p>	<p>See the response to the previous comment.</p>

<p>There may be circumstances where review and involvement by the WDNR coinciding with the USEPA may be warranted, particularly when contaminated building materials are comingled with soil and/or they will be managed on-site (e.g., left in-place or used as fill material). Some potential scenarios where the RP may desire input and consensus on the management of building materials include the following: (See attached Table)</p>	<p>the BF Technical Subcommittee</p>	
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<i>Examples</i>	<i>Requirements</i>	<i>Potential Issues</i>	<i>Possible Areas for WDNR Review and Input</i>
Concrete and brick will be crushed and reused as fill	<ul style="list-style-type: none"> • Characterization in accordance with TSCA requirements and NR 700 RCLs • Obtaining a low hazard exemption 	<ul style="list-style-type: none"> • Consensus by both the WDNR and USEPA on sampling strategy with regard to meeting cleanup objectives • Consensus by both the WDNR and USEPA on cleanup standards • Determination the reuse would not pose WDNR future concerns for site closure under NR 700 • Meeting NR 700 requirements for direct contact barrier if TSCA requirements are met and NR 700 direct contact RCLs are exceeded • Acceptability for inclusion under the expedited review and approval process as a Type C site 	<ul style="list-style-type: none"> • Acceptability of discrete vs. composite sampling strategies for demonstrating compliance with cleanup objectives • Meeting requirements for site closure under NR 700 • Coordination between NR700 and NR 500 for obtaining the low hazard exemption
A structure (e.g., concrete slab or foundation) is to be left-in place	<ul style="list-style-type: none"> • Characterization in accordance with TSCA requirements • Obtaining a low hazard exemption 	<ul style="list-style-type: none"> • Consensus on sampling strategy with regard to meeting cleanup objectives • Consensus on designation as a low or high occupancy area • Structure would pose concern as future environmental pathway for leaching to soil or groundwater under NR 700 • Structure may be demolished in the future as part of a brownfield redevelopment 	<ul style="list-style-type: none"> • Acceptability of discrete vs. composite sampling strategies for demonstrating compliance with cleanup objectives • WDNR consensus on TSCA determination for a low or high occupancy area • NR700 RCLs would not apply

<p>PCB impacted building materials are comingled with soil (e.g., paint, rubble)</p>	<ul style="list-style-type: none">• Characterization could require meeting both NR 700 as soil or fill and TSCA requirements for PCB bulk solid waste	<ul style="list-style-type: none">• Determination as to whether or not the material would be considered soil or fill under NR 500• Applicability under NR 700 and/or TSCA• Acceptability for inclusion under the expedited review and approval process as a Type C site	<ul style="list-style-type: none">• Acceptability of discrete vs. composite sampling strategies for demonstrating compliance with cleanup objectives• Meeting requirements for site closure under NR 700
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