

## Anonymous Anonymous

Ecology has recently taken a (legally questionable) position at many sites that if surface water is a potential pathway at a cleanup site, groundwater cleanup levels must be equal to the surface water cleanup levels. Under this policy position, the surface water cleanup levels for TPH will become de facto groundwater cleanup levels. Ecology will be asking PLPs to clean up groundwater to non-detect concentrations of petroleum hydrocarbons (when accounting for the PQL). Ecology also does not currently allow the use of silica gel cleanup with the NWTPH methods, so measurements include naturally occurring organic compounds. Ecology will conceivably be asking potentially liable parties (PLPs) to clean up naturally occurring organic compounds in groundwater and surface water to non-detect concentrations, a requirement that is neither reasonable nor feasible. Promulgation of the protective values as cleanup levels will add excessive time and cost (in the range of years to decades of time and tens of thousands to millions of dollars in cost) to remediate petroleum hydrocarbon contaminated sites, without a clear environmental benefit. The effect will be to slow down or stall the remediation of many petroleum hydrocarbon contaminated sites. In many cases the cleanup levels may be unachievable in groundwater within any reasonable restoration timeframe and/or lead to many feasibility study/disproportionate cost analysis results concluding that any active cleanup of TPH sites would disproportionately costly (especially for diesel sites with non-detect cleanup levels).