



Situation RCRA Permit
Water Monitoring

Location Valdosta, GA

Recently, PREMO initiated routine groundwater and drainage ditch surface water monitoring and reporting activities at a chemical manufacturing facility in the Southeast United States. The project scope was defined in a RCRA permit Corrective Action Program (CAP) for releases from solid waste management units (SWMUs) and post-closure care (PCC) for a closed hazardous waste storage tank. The monitoring program included in the permit was negotiated by the current PREMO Project Manager who previously managed the completion of the RCRA Facility Investigation (RFI), an approximately two-year multi-phase extraction remediation project, and also the remediation of contaminated sediment. The objective of the project was to conduct routine monitoring in a cost-effective manner, maintain compliance with the RCRA permit requirements, identify and implement cost-reduction opportunities, and relieve corporate and facility management of any significant efforts to oversee and manage this work.

PREMO assembled a field services team including both project management and technicians with the necessary groundwater sampling, analytical, and QA/QC capabilities to sufficiently satisfy the needs of the client and all regulatory requirements. Project management personnel were assigned based on their familiarity with the client, the facility, prior RCRA corrective action program activities, state RCRA regulations and regulatory personnel.

Results

PREMO has completed two years of monitoring and reporting including the following accomplishments:

- Cost reductions were achieved by training and utilizing available facility personnel to assist with groundwater and surface water sampling.
- The sampling approach and level of effort was refined over four routine groundwater and surface water monitoring events to minimize field services activities.
- Appendix IX annual sampling results were validated and managed to minimize the addition of analytes to the PCC program requirements.
- Templates were developed for the semi-annual and annual reports for the CAP and PCC programs to minimize reporting costs.
- Dissolved metals analysis was voluntarily added to the program to provide a more complete understanding groundwater quality in support of results interpretation and discussions with regulators.
- "Clean hands/dirty hands" sampling protocols are being utilized to maintain high sample quality.

After a third year of monitoring, PREMO will assist the client in developing a strategy for approaching the regulators for permit modification and monitoring reductions based on the analytical results, concentration trends, and submitted reports.