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## ALTERNATIVE FREE PRODUCT TERMINATION REQUEST

The Iowa Administrative Code 567 – 135.7(5)f states “The department will consider proposals to terminate free product recovery when the amount of product collected from a monitoring well is equal to or less than 0.1 gallon each month for a year unless **another plan** is approved by the department.” If another or alternative plan proposes termination of free product activities, it must demonstrate free product recovery has been conducted to the maximum extent practicable.

Alternative plans to terminate free product recovery must provide a detailed justification for why all free product activities should cease along with the information and documentation necessary to support the recommendation. At a minimum, the following information and supporting documentation should be provided and discussed with the alternative plan:

- Brief Site History
- Free Product History, including a description of actions taken to reduce, remove, or otherwise eliminate the presence of free product
- Estimated amount of free product recovered from the site
- Estimated amount of free product remaining at the site and description of estimation method
- The free product plume has been adequately delineated horizontally and vertically and is stable (not migrating)
- The groundwater contamination plume resulting from the free product is stable or overall declining and no unacceptable risk to actual and potential receptors, including susceptible water supplies and aquifers, remains from the free product or associated plume
- Soil Contamination Plume Maps (from latest revised Tier 2 Site Cleanup Report)
- Groundwater Contamination Plume Maps (from latest Site Monitoring Report)
- Map(s) depicting the estimated area of free product in relation to property boundaries (i.e. whether the free product plume is onsite or extends off-site) and surrounding land use
- Hydrogeologic profile/cross-section depicting volumes/zones of soil and groundwater contamination and volume/zones of free product
- Tabulation and graphing of historic free product thicknesses in relation to static water level at selected groundwater monitoring wells
- Description of seasonal variations in thickness of free product
- All site-associated monitoring wells have been inspected for the presence of free product
- In recent years several novel technologies for determining quantity and extent of LNAPL/free product have been introduced to the remediation market. Implementation of such technology could potentially be useful as a quantitative line of evidence on how much free product exists and where it is located laterally, vertically, and in relation to site-specific geology.

Note: Not all sites will qualify for early termination of free product activities. Some sites will have sensitive receptors or other sources of risk that could be difficult to quantify in a manner consistent with suspension of free product recovery and monitoring prior to fulfillment of standard endpoint criteria. Please be aware that submission of the information requested in this document does not assure that early closure will be allowed.

If an alternative free product termination plan is accepted by the department all free product activities may cease at the site. However, as residual free product will remain at the site, the No Further Action Certificate will state, “It is acknowledged that residual free product remains at this site.” The certificate must be filed with the County Recorder.

Please contact Elaine Douskey at (515) 725-8311 or [elaine.douskey@dnr.iowa.gov](mailto:elaine.douskey@dnr.iowa.gov) if you have any questions concerning this posting.

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