

Current MCP Program Topics

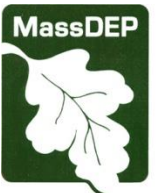
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Topics

- Status of work on evaluating potential vapor intrusion pathway at TCE sites
- Per- and polyfluoroalkyl substances (*PFAS*) sites
- Soil management
- Active Exposure Pathway Mitigation Measures - focus on remote monitoring and compliance
- MCP Amendments overview

Active Exposure Pathway Mitigation Measures - Compliance

- Background - MCP amendments leading to “AEPMMs” and remote monitoring requirements
- Key requirements
- Remote monitoring registration
- Current compliance and enforcement

Regulatory Background

Pre-2014 amendments

- Program focus on disposal sites with vapor intrusion
- Subslab depressurization systems = most effective & reliable VI mitigation measure, particularly at higher concentrations
- MCP disallowed Permanent Solution if Active O&M is ongoing

Regulatory Background

- Inability to reach closure with a subslab depressurization system was a disincentive for their use

Intent - 2014 Amendments

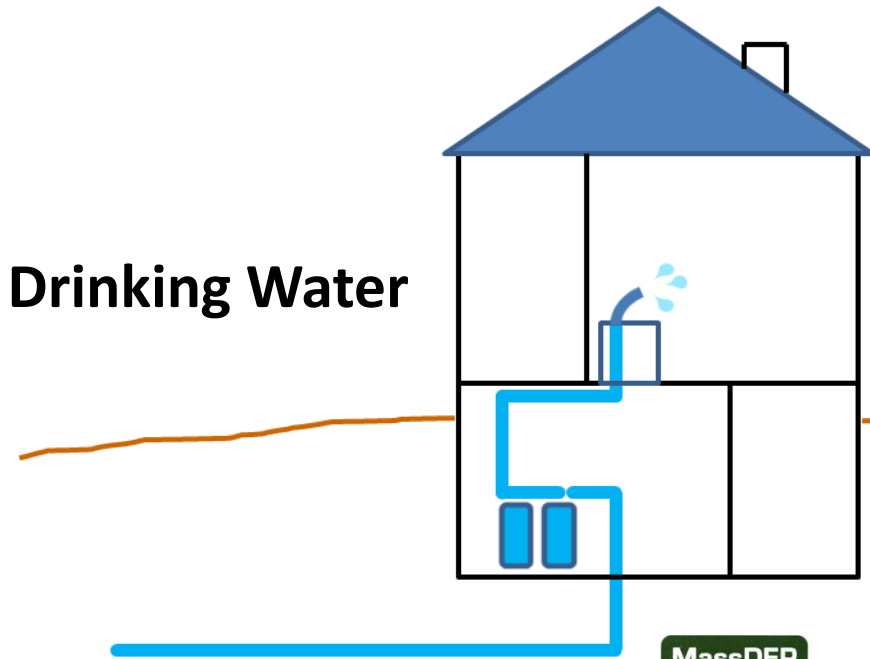
- Remove obstacle for closure where the only ongoing Active O&M is limited to
 - subslab depressurization system; or
 - treatment on private drinking water supply well
- Provide adequate checks and balances
 - Clearer requirements related to Sources and plume migration
 - AEPMM requirements

Active Exposure Pathway Mitigation Measures (AEPMMs)

Indoor Air



Drinking Water



Permanent Solution that rely on SSDs

Assumptions → Comfort Level

- SSDs relatively **simple** active systems to install and will **remain effective over time**, provided they remain in operation, and are maintained/repaired as needed
- Remote monitoring can be used effectively to **communicate the system status on ongoing basis** to MassDEP and building owner/operator

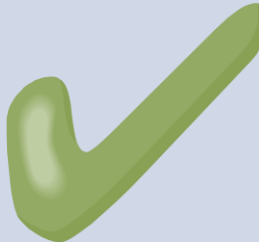
Not AEPMMs

**Source
Treatment or
Containment
Systems**

**Air
Purifying
Units**

Required with AEPMM?	Perm. Soln. with Conditions *	ROS, Temp. Soln.	Other (IRAs, RAMs, Phase IV)
AUL with standard conditions	✓		
Established operating regimen	✓	✓	
Remote Monitoring	✓	✓	
<i>Written</i> Notification after 30 days of shutdown	✓	✓	
Status Reports & RMRs		✓	✓
Annual Certification	✓		

* *Not an option if IH results with AEPMM down for 60 consecutive days*

Required with AEPMM?	Perm. Soln. with Conditions	ROS, Temp. Soln.
Remote Monitoring		

Remote Monitoring Registration

- ❑ Start at MassDEP's registration page

<http://www.mass.gov/eea/agencies/massdep/cleanup/regulations/remote-telemetry-information.html>

- ❑ Review Remote Monitoring Q&A (11/16)



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Remote Telemetry Information for Active Exposure Pathway Mitigation Measures

Active Exposure Pathway Mitigation Measures (AEPMM) that are part of a Permanent Solution, Temporary Solution or Remedy Operation Status require the use of remote monitoring technology to provide immediate notification to both MassDEP and the owner and operator of the building protected by the AEPMM upon failure of the AEPMM, as the result of loss of power, mechanical failure or other significant disruption of the effectiveness of the system (pursuant to 310 CMR 40.1025(3)(d) and 40.1026(3)(d), respectively).

[A printable Remote Telemetry Q&A is available here.](#)

Remote Monitoring Registration Process

Updated Effective February 1, 2016

1. Select and install AEPMM Remote Monitoring System

✓ System must be able to communicate via text or email. Registration of new systems that rely on voicemail will not be accepted on or after February 1, 2016.

✓ System must be able to immediately communicate BOTH system shutdown AND system restart.

MassDEP Site Cleanup

[A to Z Quick Links](#)[Site Cleanup Index](#)

Remote Monitoring Registration

- ❑ Select and install AEPMM remote monitoring system
- ❑ Initiate the AEPMM remote monitoring system registration by completing the **Initial Device Registration**

<http://www.mass.gov/eea/agencies/massdep/cleanup/regulations/remote-telemetry-information.html>

Registration Form

Initial Device Registration

Complete the Initial Device Registration Form below and click send. If this information is successfully received, you will receive a confirmation email with the subject line "RE: Device Registration". If you do not receive a confirmation email, please contact MassDEP at: AEPMM.BWSC@state.ma.us.

RTN: - Device Number: (01, 02, etc)

Device Installation Date:

Device Type(s) Monitored: (Pump, fan, etc):

Telemetry Device Manufacturer:

Telemetry Device Make:

Telemetry Device Model #:

Method of data transfer being used with this device (Email or Text):

Description of the Notification Events (shutdown, restart, etc...)
the system is programmed to report:

AEPMM Location (Building Name, floor & room):

Address:

Town:

State:

Zip:

Contact Name:

Contact Organization:

Contact Email:

Contact Telephone:

Click "SEND" to submit this Device Registration by email.

Remote Monitoring Registration

- ☐ MassDEP will contact you within 5 business days to arrange to conduct a manual system **shutdown and restart communication test**
- ☐ If the test is successful, you will concurrently receive confirmation that the AEPMM remote monitoring system has been successfully registered and the process is complete

Assistance

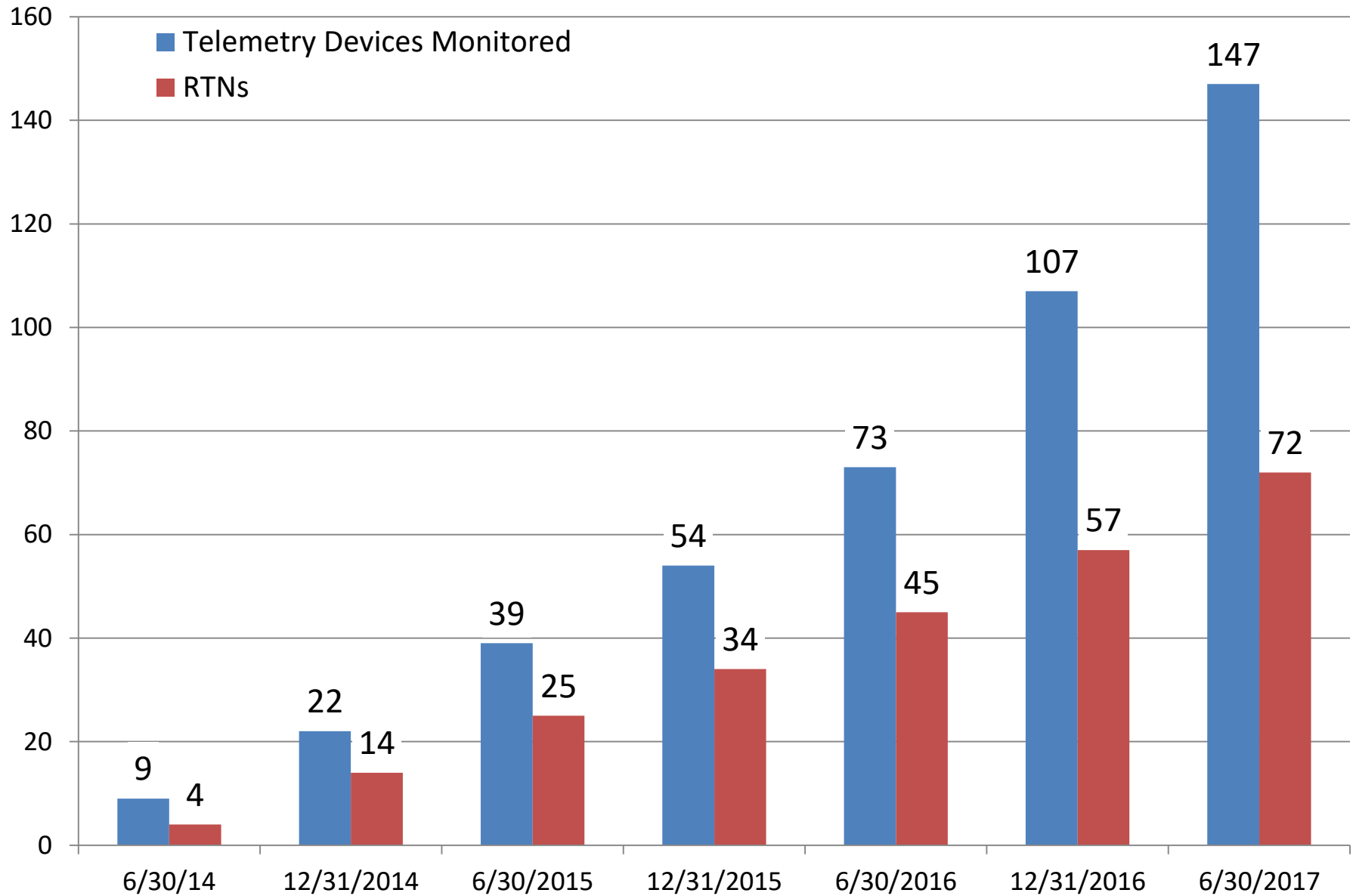
AEPMM.BWSC@state.ma.us

Brian.Roden@state.ma.us

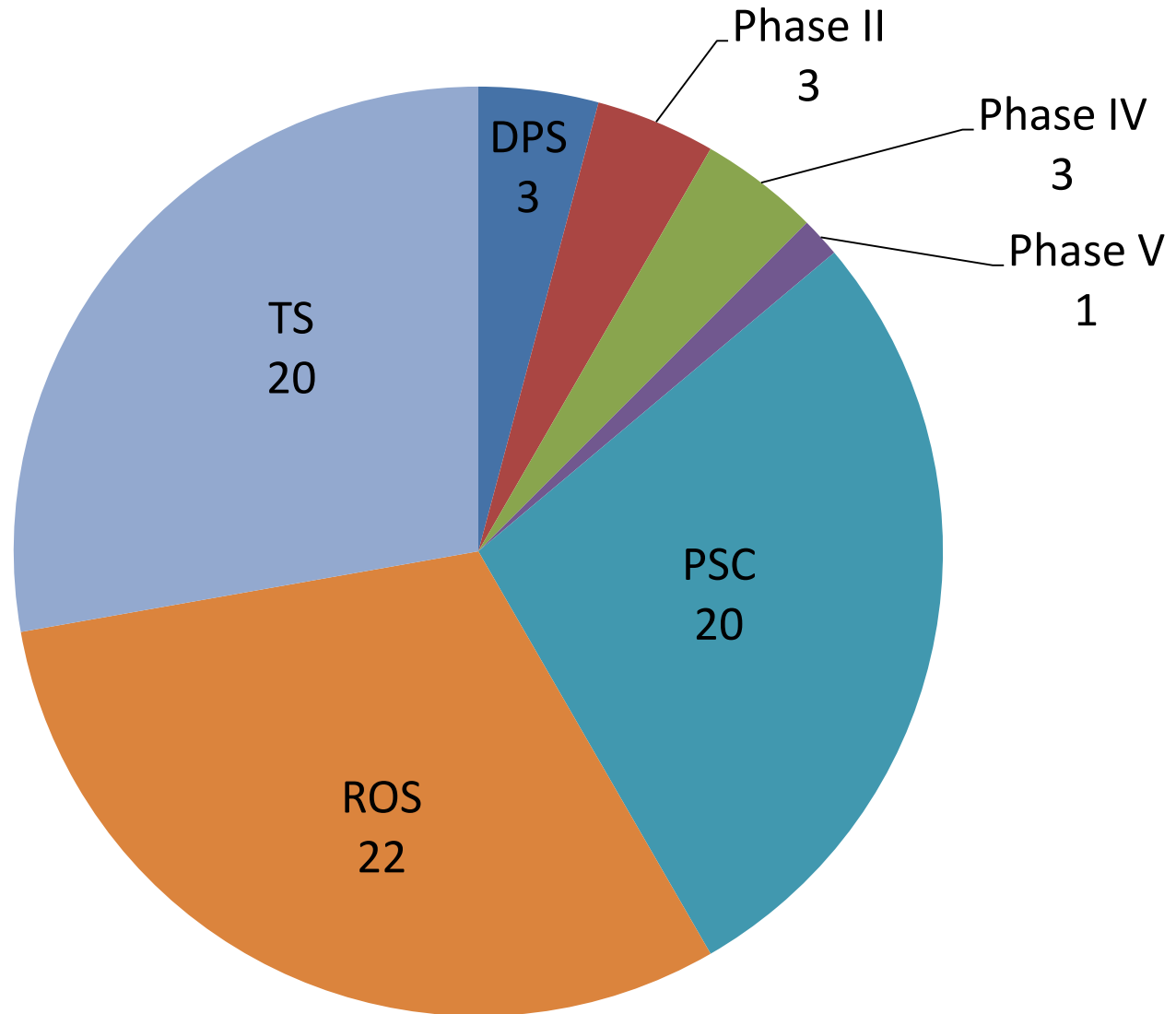
(617) 292-5930



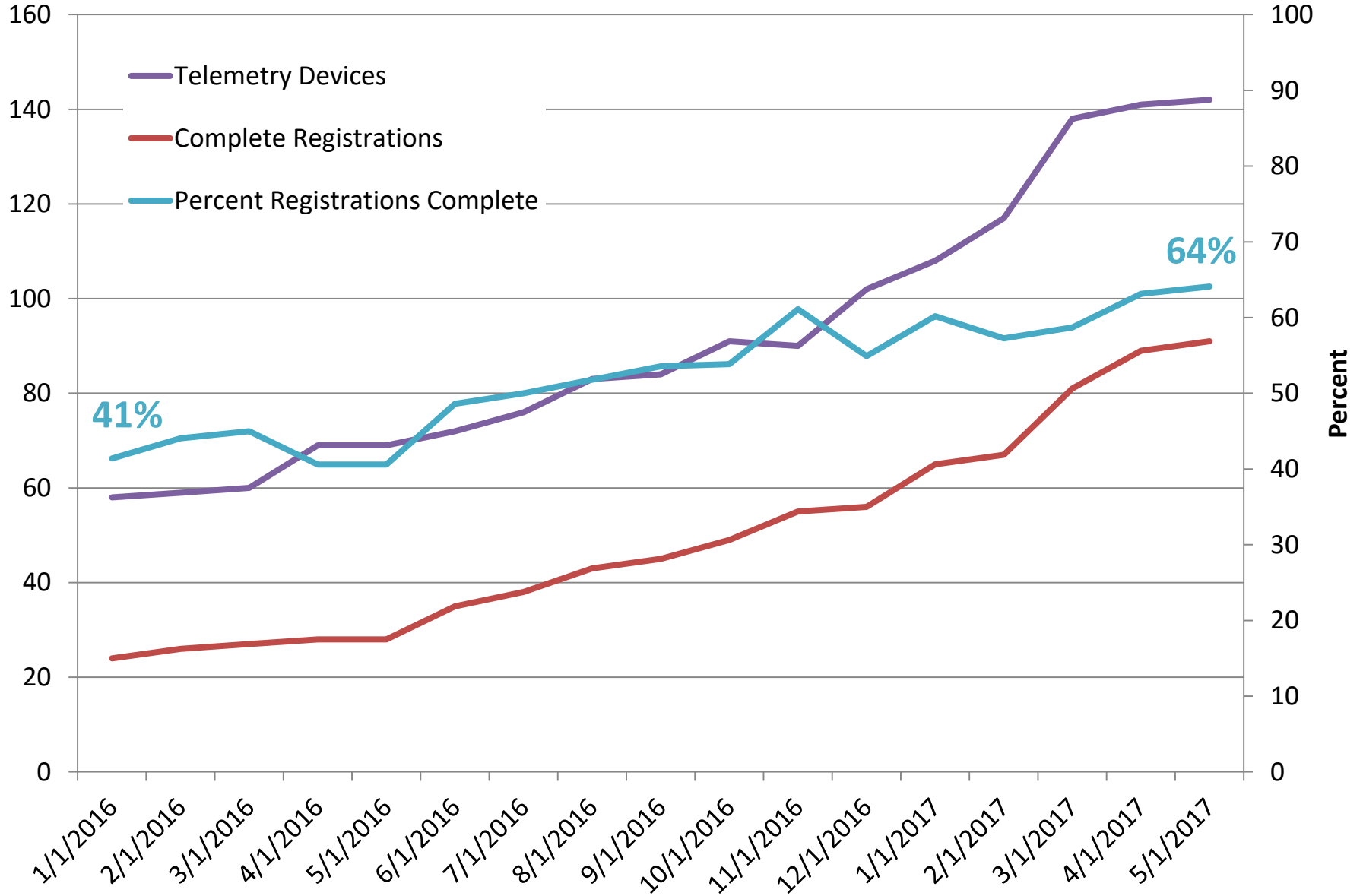
AEPM Telemetry Initial Registration Completed



Primary RTN Status for Initial Telemetry Registrations



Telemetry Registration Compliance




Status Remote Telemetry Registrations – May 2017

147 telemetry devices (72 RTNs) have completed the initial online registration step

- 91 devices are completely registered (shutdown/restart transmitted in an acceptable format)

- 
- 30 devices – working on formatting changes/haven't yet conducted shutdown restart tests/shutdown only

- 
- 21 devices – have not transmitted a recognizable notification
 - 5 devices – AEPMM is no longer required to maintain NSR

Remote Telemetry Compliance & Enforcement – Incomplete Registrations

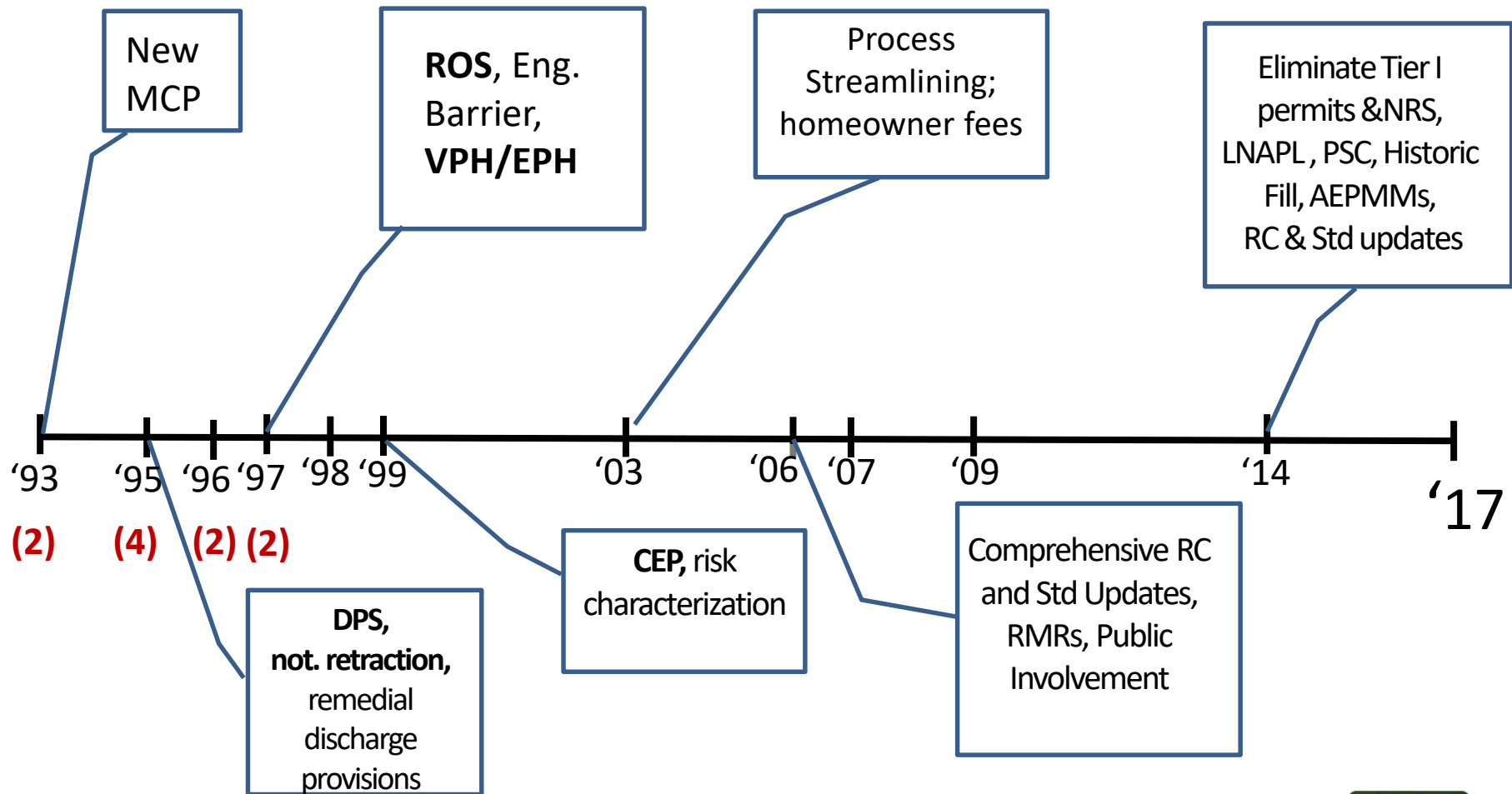
- MassDEP's conducting audits (Screening & Level II)
- Issuing NONs for telemetry devices that are not functioning properly, and the PRP has
 - not responded to MassDEP's attempts to complete the registration (conduct the shutdown/restart test); or
 - failed to correct the system over a long period of time
- NONs require a successful shutdown/restart test within 60 days of notice
- If successful test is not conducted by deadline, MassDEP may invalidate PSC, TS, or ROS supported by the SSDs and remote monitoring system

Remote Telemetry Compliance & Enforcement – No Registration

- October 2016, ~ 40 RTNs identified as having AEPMM but no registered telemetry
- Since then, 13 of those RTNs have registered
- Regional staff currently reviewing the other RTNs to determine whether NON is appropriate

2017 MCP Amendments

MCP Amendments – *A History*



MCP Amendments – *A History*

Changes over time

- Process streamlining/tweaking
- New provisions/features based on experience or program focus
- Keep cleanup standards current
- Improve or fix provisions

Potential 2017 Amendments

- Changes held over from the 2014 amendments process
- Some significant proposals
- Many (most) follow-up to 2014 amendments or other housekeeping changes

Held over from 2014

- PCE standard change, toxicity value hierarchy

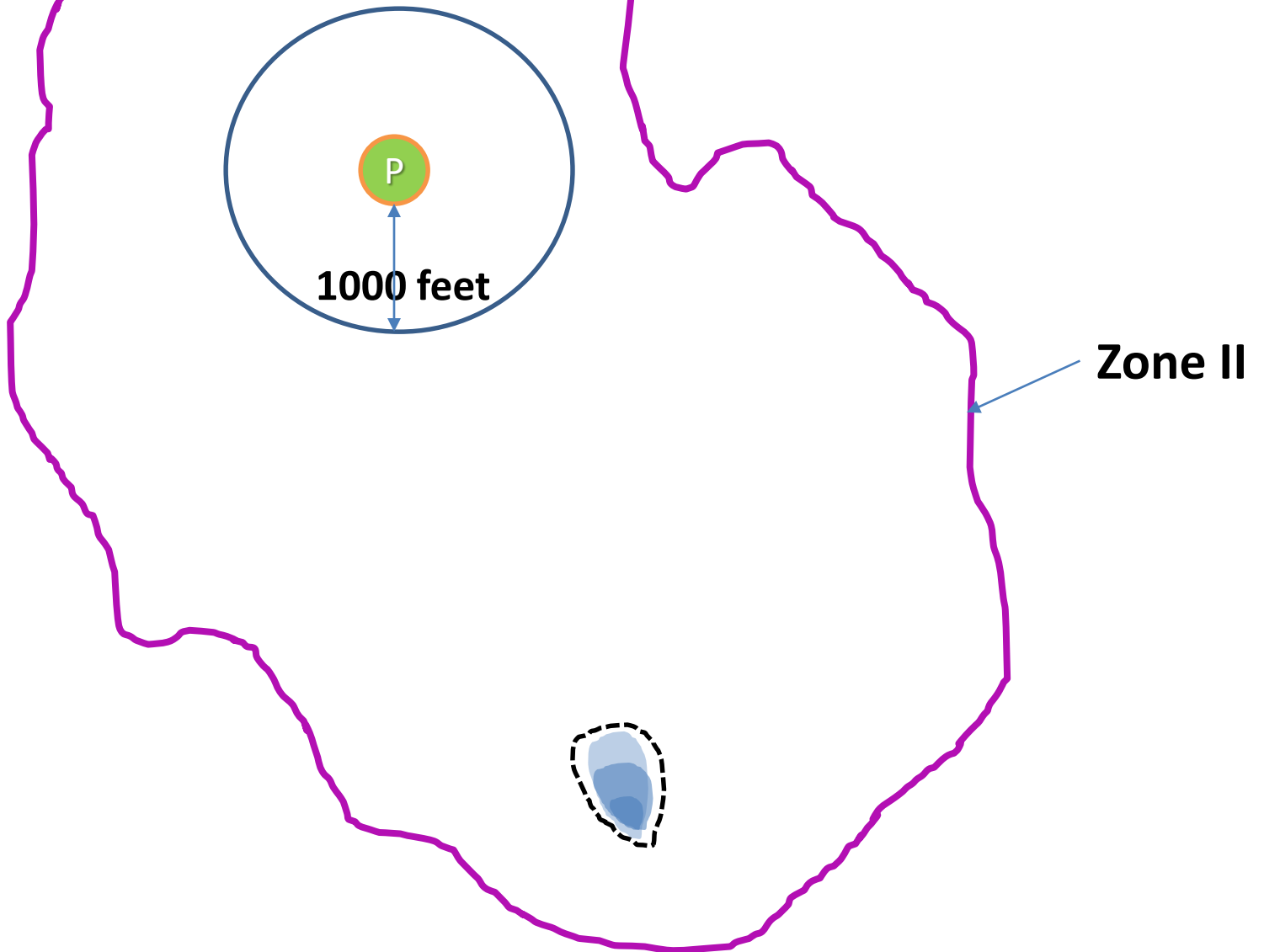
Other Standard & RC Changes

- PAHs
- PFAS

Significant Proposals

- GW-1 exceptions
 - 40.0924(2)(b)3.
 - NPDWSA

310 CMR 40.0924(2)(b)3.



Significant Proposals

- GW-1 exceptions - 40.0924(2)(b)3, NPDWSA
- EPCs and averaging
- Permanent Solution with Conditions
- IH Changes?
 - Will update List of “Could Pose” IH values at 310 CMR 40.0321(2)(b), but no major change to IH approach

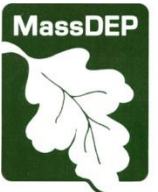
Follow-up from 2014

- NAPL with Microscale Mobility and AUL trigger
- Tier Classification and Temporary Solution
- Post-Permanent Solution provisions – 40.1067
- AEPMM-related
 - Tighter definition of AEPMM
 - Requirements for verifying ongoing system operation (in place of telemetry) for private water supply systems
 - Annual telemetry check with certification?

2017 MCP Amendments

- Draft List of Potential Amendments

<http://www.mass.gov/eea/agencies/massdep/news/advisory-committees/waste-site-cleanup-program-advisory-committee.html>



Questions?