



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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High-Resolution Site Characterization Checklist ELTF Eligible Petroleum Sites

The criteria listed below will be used to determine the acceptance in using high-resolution site characterization (HRSC) tools at Excess Liability Trust Fund (ELTF) eligible petroleum cleanup sites. The criteria is fundamentally based on the potential age of the release to the environment, complexity of the underlying hydrogeological conditions, and whether there are data gaps. New sites with no history of prior releases and minimal knowledge of the area geology will generally be looked at more auspiciously. However, there may also be cases with older releases where persistent non-aqueous phase liquid (NAPL) may result in an unpredictable migration of dissolved contaminants. In such cases, HRSC may be a viable option to address data gaps and refine the CSM to develop a more effective remedy. Based on site-specific circumstances, HRSC may also be used to evaluate potential risks to sensitive receptors or as a line of evidence to support site closure.

Depending on site(s) circumstances, IDEM will request a meeting to discuss systematic planning and develop a dynamic work strategy that includes real-time measurements to reduce unnecessary delays and/or costs.

1. New Site (Must meet all criteria):

- | | Yes | No |
|--|--------------------------|--------------------------|
| a. No history of a prior release (only fresh NPAL), and | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Bedrock is greater than 25 feet below ground surface, and | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Heterogeneities in unconsolidated material, and | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Corrective Action Plan (CAP) is necessary | <input type="checkbox"/> | <input type="checkbox"/> |

2. Release is more than five years old:

- | | Yes | No |
|---|--------------------------|--------------------------|
| a. Not making closure progress or more than one CAPA, or | <input type="checkbox"/> | <input type="checkbox"/> |
| b. More than two NAPL removal actions, or | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Persistent NAPL remains greater than 0.1-foot thick, or | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Groundwater flow system anisotropic, or | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Data gaps remain in the Conceptual Site Model, or | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Dissolved plume is a potential risk to sensitive receptors, or | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Off-site potential vapor intrusion. | <input type="checkbox"/> | <input type="checkbox"/> |