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As representatives of communities across the U.S. impacted by toxic groundwater contamination, we welcome EPA's Groundwater Remedy Completion Strategy, and we appreciate the opportunity to comment on the October 29, 2013 review draft.

In general, we support the draft Strategy. We hope that the following key points remain in or are added to the final document:

1. Regardless of the pace of groundwater restoration, it is essential to prevent exposures to unsafe levels of toxic substances. Yet prevention of exposures should not be used as an excuse to slow or halt groundwater remediation. The elimination of pathways, such as drinking water or vapor inhalation, does not in itself eliminate the obligation to remediate groundwater.
2. The timely completion of groundwater remediation is heavily dependent on activities at the early stage of any project, including the development of a comprehensive yet flexible conceptual site model and full delineation of groundwater contamination.
3. EPA should ensure that this strategy is implemented at all sites where it has jurisdiction, even if other (state or federal) agencies have lead status.
4. Groundwater remediation should not be avoided because of predictions that treatment and/or removal will not achieve drinking water standards throughout contaminated aquifers. Decisions should be based upon difficulties encountered only after good-faith efforts have been made.
5. Initial indications that remedies might not achieve remedial action objectives should trigger remedy optimization and/or the introduction of new remedies that achieve more rapid contaminant concentration reduction. It may be necessary to implement new remedies more than once.
6. We recognize that there may be cases in which active remediation is unable to achieve satisfactory aquifer-wide cleanup in a reasonable time frame. We do not support spending vast amounts of time and money achieving minimal contaminant (and thus risk) reduction. On the other hand, protective remedial action objectives may serve to provide incentives for both the development and use of innovative remediation technologies as well as the adoption of pollution prevention practices.

7. Regardless of the particular alternative endpoint (technical impracticability waiver, transition to passive remediation, etc.), where cleanup is not expected to achieve complete aquifer-wide cleanup, planned remedies should nevertheless maximize the protection of public health and the environment. New site-specific objectives and priorities should be adopted only with the informed input of impacted communities.
- 8 Remedies that temporarily or permanently leave contamination in place above remedial action objectives should be supplemented with monitoring strategies developed and implemented in consultation with the impacted public. In many cases, site occupants and neighbors—not responsible parties, regulators, or consultants—will be the ones who care most and even know the most about contaminated groundwater sites in the long run. Furthermore, appropriate restrictions on land and water use should be put in place as early in the investigative process as practical.

Sincerely, (in many cases affiliations are for identification purposes only)

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