

**RESPONSE 71**

## **5.0 DETECTION MONITORING**

The Detection Monitoring Program is summarized on ~~Figure 5-1~~ and discussed in the following subsections.

### **5.1 Groundwater Detection Monitoring Parameters**

Parameters that will be monitored during Detection Monitoring consist of inorganic and organic constituents found in 40 Code of Federal Regulations (CFR) Part 258, Appendix I. The detection monitoring list has been included as Table 5-1, which was compiled pursuant to 30 TAC §330.419(a). In addition to the constituents found in 40 CFR Part 258, Appendix I, other groundwater quality indicator parameters (i.e. calcium, chloride) may be collected and analyzed as part of a Detection Monitoring event but will not be evaluated in accordance with the statistical methods described in Section 5.4.

### **5.2 Groundwater Detection Monitoring Frequency**

After the establishment of background groundwater quality (refer to Section 4.0), the detection monitoring frequency for all constituents previously identified in Section 5.1 will be semi-annual during the active life, closure, and post-closure care periods of the site and as required in accordance with §330.407(a)(2).

### **5.3 Reporting Requirements - §330.407(b) and (c)**

Not later than 60 days after each sampling event, WMTX shall determine whether there has been a statistically significant increase (SSI) over background of any tested constituent at any monitoring well. In accordance with the statistical procedures outlined by Dr. Robert Gibbons for this site and supported by ASTM D6312-98, an increase is not statistically significant unless it has been verified (see Section 5.4.1). If a single detection without the use of verification re-sampling is used as a trigger for SSI, much higher control limits would be required to maintain the performance standards prescribed by USEPA for multiple statistical comparisons. If there has been a SSI, WMTX shall notify the TCEQ, and any local pollution agency with jurisdiction that has requested to be notified, in writing within 14 days of this determination.

If a SSI over background of any tested constituent at any monitoring well has occurred, WMTX shall immediately place a notice in the operating record describing the increase and