



Sites contaminated by chlorinated solvents present a daunting environmental challenge, especially at sites with dense nonaqueous phase liquid (DNAPL) still present. Restoring sites contaminated by chlorinated solvents to typical regulatory criteria (low parts-per-billion concentrations) within a generation (~20 years) has proven exceptionally difficult, although there have been successes. Site managers must recognize that complete restoration of many of these sites will require prolonged treatment and involve several remediation technologies. To make as much progress as possible requires a thorough understanding of the site, clear descriptions of achievable objectives, and use of more than one remedial technology. Making efficient progress will require an adaptive management approach, and may also require transitioning from one remedy to another as the optimum range of a technique is surpassed. Targeted monitoring should be used and re-evaluation should be done periodically.

This <u>ITRC Integrated DNAPL Site Strategy</u> (IDSS-1, 2011) technical and regulatory guidance document will assist site managers in development of an integrated site remedial strategy. This course highlights five important features of an IDSS including:

1. A conceptual site model (CSM) that is based on reliable characterization and an understanding of the subsurface conditions that control contaminant transport, reactivity, and distribution

2. Remedial objectives and performance metrics that are clear, concise, and measureable

Treatment technologies applied to optimize performance and take advantage of potential synergistic effects
Monitoring based on interim and final cleanup objectives, the selected treatment technology and approach, and remedial performance goals

5. Reevaluating the strategy repeatedly and even modifying the approach when objectives are not being met or when alternative methods offer similar or better outcomes at lower cost

This IDSS guidance and training is intended for regulators, remedial project managers, and remediation engineers responsible for sites contaminated by chlorinated solvents. Because the subject matter is complex, this guidance assumes a functional understanding of the field and is targeted towards experienced users; however, novices will benefit through descriptions and references of the latest evolution of site characterization challenges; realistic planning of site restoration; evolving treatment techniques; and evaluating, monitoring and interpreting mass transport in the subsurface aqueous and vapor phases. While the primary focus of the document is on DNAPL sites, other types of contaminated sites (e.g. petroleum, mixed contaminants, etc.) can use the same fundamental process described in this guidance.

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Although I'm sure that some of you are familiar with these rules from previous CLU-IN events, let's run through them quickly for our new participants.

We have started the seminar with all phone lines muted to prevent background noise. Please keep your phone lines muted during the seminar to minimize disruption and background noise. During the question and answer break, press #6 to unmute your lines to ask a question (note: *6 to mute again). Also, please do NOT put this call on hold as this may bring unwanted background music over the lines and interrupt the seminar.

Use the "Q&A" box to ask questions, make comments, or report technical problems any time. For questions and comments provided out loud, please hold until the designated Q&A breaks.

Everyone – please complete the feedback form before you leave the training website. Link to feedback form is available on last slide.



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Dr. Dan Bryant, Ph.D., is In-Situ Remediation Practice Leader for Woodard & Curran in East Windsor, New Jersey. Dan has worked in the field of in-situ chemical and biological remediation methods since 1997. Dan holds three patents related to biological and chemical in-situ treatment technologies of organic and inorganic contaminants in soil and groundwater. Dan is particularly involved in design and implementation of in-situ chemical oxidation projects in the U.S. and Europe. Dan has contributed to the ITRC since 2008 as a member of the Integrated DNAPL Site Strategies team. Dan earned bachelor's and master's degrees in geology from the University of Florida in Gainesville, Florida in 1988 and 1990, respectively, and a Ph.D. in geology from Columbia University in New York City, New York, in 1995.

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Dr. Tamzen Macbeth is a Vice President at CDM Smith out of Helena, Montana. She has worked for CDM since 2009. Previously, she worked for 7 years at North Wind Inc. Tamzen is an environmental engineer with an interdisciplinary academic and research background in microbiology and engineering. She specializes in the development, demonstration and application of innovative, cost-effective technologies for contaminated groundwater. Specifically, she is experienced in all aspects of remedies from characterization to remediation for DNAPLs, dissolved organic, inorganic, and radioactive contaminants under CERCLA and RCRA regulatory processes. She has expertise in a variety of chemical, biological, thermal, extraction and solidification/stabilization remediation techniques as well as natural attenuation. Her current work focuses developing combined technology approaches, and innovative characterization techniques such as mass flux and mass discharge metrics. Since 2004, Tamzen has contributed to the ITRC as a team member and instructor for the ITRC's Bioremediation of DNAPLs, Integrated DNAPL Site Strategy, Molecular Diagnostics and DNAPL Characterization teams. Tamzen earned a bachelor's degree in Microbiology in 2000 and a master's degree in Environmental Engineering in 2002 both from Idaho State University in Pocatello, Idaho, and a doctoral degree from in Civil and Environmental Engineering in 2008 from the University of Pocatello.



Are you achieving your cleanup goals and/or objectives?

Is it time to think about making a change in your remedial approach?

If you are like most of us the answer is probably, "yes"

If you answered YES to the questions above, then boy do I have the guidance document for you!





It took a large effort from many people to develop this tool to assist site managers in the development of an integrated site remedial strategy. The list of organizations on this slide highlights the diversity and expertise of our team members.

Team initially formed in 2007 and kicked off in 2008 - comprised of a mix of State, Federal and Private entities, as well as academic and community interests.

Great mix of professionals that look at contaminant issues from differing points of view and for different client interests.



The ITRC Integrated DNAPL Site Strategy technical and regulatory guidance document – sometimes we will refer to it as the "Tech Reg" serves as the basis for this training class. As we move through the presentation you will see references to chapters, sections, tables, flow charts as other information to this document. If you haven't already we encourage you to download a copy and use it to help you with your DNAPL sites.



The IDSS guidance will improve the management of any remedial project





The IDSS document is process-oriented, and the process starts with the CSM and then loops back to it as new information is available.

CSM - cant solve the problem if you don't understand the problem.

CSM is an organized set of ideas about a site - encompasses key elements.

Can be presented graphically and/or in a variety of ways

CSM can be challenging to develop

CSM is needed to support developing remedial objectives

To develop and work with a CSM as a living tool, it is necessary to understand some of the basic science and the dynamics of how DNAPLs and plumes behave in the subsurface.

We are not going to get too bogged down in risk evaluation methods, etc. – just focusing on DNAPL sites and the unique aspects.



The current site understanding is "Black Box"



What you currently think about your CSM might change after today's presentation, so please stay with us and follow along.



A CSM has to account for the physics and chemistry of a subsurface release. "If we don't understand the problem, we probably can't solve the problem."

Main Processes in Chlorinated Solvent Releases include: -DNAPL movement and all related capillary phenomena -interphase chemical mass transfer – where is your mass? -put it all together in 3-Dimensions and include transport and reactions.



Need to consider the DNAPL itself:

-Is DNAPL present?

-Even when present will be very hard to identify.

-Just because you can't find it doesn't mean it isn't there.

-DNAPL "pools" are rare – we are more concerned with the question of DNAPL saturation and residual vs. mobile DNAPL.

-Mobile DNAPL = interconnected at pore scale

-Residual DNAPL (immobile) = disconnected blobs and ganglia

-Either Mobile or Residual DNAPL is a challenge for cleanup



Describe how this affects your CSM and importance for decision making.







Don't actually see many DNAPL releases in "early stage". Usually after 10-20 years you have moved into middle or late stage, but early stage is important to understand as the starting point.





Can evaluate this by looking in detail at vertical delineation with respect to geologic variability. Is contaminant concentration higher in low perm zones?

Examples -

Simple = using vertical delineation with PID readings

More complex = downhole real time instruments such as MIP.

So, think about if there is data at your site that you can go back and reevaluate? Do you have data gaps? Why is it important.... Next slide.



Figure represents simplified treatment result where more transmissive zone is preferentially treated.

Early Stage – Biggest bang for the buck on improvement in plume condition because diffusion out of transmissive zones has been minimal at this stage. But, we may not have treated the high concentration source unless it was specifically targeted for treatment.

Middle Stage – Worst scenario for potential back-diffusion because a large reservoir of moderate concentrations exists over a large volume that may not have been accessible to treatment.

Late Stage – Still potential for back diffusion but less so than middle stage because contaminant mass reservoir in the inaccessible zones has been depleted somewhat.



Basu et al., 2008. "Simplified contaminant source depletion models as analogs of multiphase simulators" Journal of Contaminant Hydrology 97 (2008) 87–99.



14-Co	ompar	tmen	t Moo	lel		
Relative	aqueous	phase of	equivaler	nt concen	trations	
	ss based			arly Stage	_	
	SOU	RCE	PLUME			
Zone/Phase	Low Permeability	Transmissive	Transmissive	Low Permeability		
Vapor	LOW	MODERATE	LOW	LOW		-
DNAPL	LOW	HIGH				
Aqueous	LOW	MODERATE	MODERATE	LOW		>
Sorbed	LOW	MODERATE	LOW	LOW	1	
	SOU	RCE		iddle Stag	e	
Zone/Phase	Low Permeability	Transmissive	Transmissive	Low Permeability		
Vapor	MODERATE	MODERATE	MODERATE	MODERATE		
DNAPL	MODERATE	MODERATE				
Aqueous	MODERATE	MODERATE	MODERATE	MODERATE		
Sorbed	MODERATE	MODERATE	MODERATE	MODERATE		\frown
				Late Stag	e	
	SOURCE		PLUME		7	
Zone/Phase	Low Permeability	Transmissive	Transmissive	Low Permeability		
Vapor	LOW	LOW	LOW	LOW		
DNAPL	LOW	LOW				
Aqueous	MODERATE	LOW	LOW	MODERATE		
a tot	MODERATE	LOW	LOW	MODERATE		
Sorbed						

Relative aqueous phase equivalent concentrations

Shows equilibrium tendencies and relative MOVEMENT OF CONTAMINANT between phases Not mass based

Does not show relative CONTAMINANTMASS DISTRIBUTION between chemical phases of in different compartments





There is always more to know, but...

Do you think you can formalize your CSM? Are there areas of your site where you need to question your assumptions? Do you think you can update your CSM?

Make this work for you, develop your CSM using any combination of graphics, maps, cross sections, data, etc.

Refer to ITRC MASS FLUX document: ITRC Use and Measurement of Mass Flux and Mass Discharge (MASSFLUX-1, 2010)

http://www.itrcweb.org/guidancedocument.asp?TID=82

Now... will briefly discuss a tool that can help in organizing your CSM and that is used later in this presentation.



SMART remedial objectives: Specific, Measureable, Attainable, Relevant, Time-bound

Stakeholder and SMART Attributes – Community stakeholders have had concerns that viable approaches are rarely chosen. Applying SMART Attributes to Functional objectives may alleviate some concern as a viable approach with long term (absolute) objectives and reasonable (functional) objectives which can be used by all parties concerned.

The specific diagnostic questions give a succinct direction to the stakeholder as to what should be asked and addressed.



At most sites, the ultimate objective of site restoration is to achieve MCLs in all impacted media, but this objective is often technically and/or economically impracticable within "reasonable" time frames.



SMART acronym was develop by the American Management Association (AMA) to recognize good objectives.

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Cleanup value for PCE in soil that was protective of indoor air was determined to be 40 μ g/kg, which was also protective for dermal exposure and ambient air exposure.

Cleanup value of PCE in groundwater that was protective of indoor air was determined to be 8 μ g/L.

Cleanup value for PCE in groundwater as a drinking water source was selected to be the drinking water standard of 5 μ g/L.

Achieving these cleanup values would allow unrestricted use of the site – enhancing the value of the property and a goal of the developer.





- Absolute Objectives:
 - · Protection of human health and the environment
 - · Redevelop the Mall Area
- Generic Functional Objective Not SMART
 - Vapor Intrusion Indoor Air Objective Soils Pathway
 - Reduce concentrations of volatile organics in the vadose zone that will allow a "No Further Action" for unrestricted use, with no engineering or administrative controls required

One of several Functional Objectives. Notice that it does not meet the SMART criteria. Must now take this an make it meet the SMART criteria



The 6 month criteria was a driver provided by the developer who needed to meet a specified schedule for redeveloping the mall.

Higher concentrations might have been left in place if engineering controls and deed restrictions were to be part of the cleanup decision making. The developer wanted no such restrictions.








Table 4.1: Note the ITRC Publications!

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Technology Category	Example Technologies	Example Reference	
Physical Removal	Excavation	NAVFAC, 2007	
	Multiphase Extraction	USACE, 1999	
	Thermal Conductivity/ Electrical Resistance Heating	Johnson et. al., 2009	
Chemical/ Biological	In Situ Chemical Oxidation	ITRC ISCO-2, 2005	
	In Situ Chemical Reduction	Liang et. al., 2010	
	In Situ Bioremediation	ITRC BIODNAPL-3, 2008	
	Monitored Natural Attenuation	ITRC EACO-1, 2008	
Containment	Pump and Treat	USEPA, 1999	
	Low-Permeability Barrier Walls	NRC, 1997	
	Permeable Reactive Barriers	ITRC PRB-5, 2011	
	Solidification/Stabilization	USEPA, 2009; ITRC S/S-1, 20	

Some technologies may fit in more than one Technology Category.



Technologies can be overlain on the 14-Compartment Model in order to determine if a technology is likely to achieve goals and to choose between technologies. This requires an order-of-magnitude assessment of the anticipated amount of COC reduction.



• Need 4 OoMs (99.99% reduction)



Section 4.1.1 has a formula that converts before-and-after concentration data to OoMs.



A practitioner's knowledge of site conditions coupled with experience using a technology under those types of conditions often provide the best source of OoMs. However the scientific literature and the opinions of technology specialists are also important resources to consider.



Full references of these and other studies are included in the document.



Box plots are used to present average results as well as to express the amount of variability in the results. Wide variability may indicate that a technology must be designed and applied thoughtfully considering site-specific conditions.



Multi-site studies also of important limitations to recognize, emphasizing caution in just using performance data without considering the site-specific issues.



Concentration reduction (shown as OoMs) on this slide are from a multiple site study.



Concentration reduction (shown as OoMs) on this slide are from two multiple site studies.



Concentration reduction (shown as OoMs) on this slide are from multiple site studies. The OoMs reduction for MNA is over an average 9-year treatment period.



Concentration reduction (OoMs) from multiple site studies. The ZVI permeable reactive wall data is derived from only from six sites, and represents change in groundwater concentration from upgradient to downgradient wells.







The IDSS team assessed each potential coupling for compatibility. The notes associated with the matrix provide details on the logic of how each couple was assessed for compatibility.





This is an adaptation of the process developed to guide the transition from any aggressive remedy to MNA that was developed by the ITRC (ITRC EACO-1, 2008). Also see Section 6 for a detailed discussion of considerations for transitioning between technologies.

ITRC Technical & Regulatory Guidance for Enhanced Attenuation of Chlorinated Organics (EACO-1, 2008)

http://www.itrcweb.org/guidancedocument.asp?tid=50



Source A	Area Ex	cavati	on			
	Source					
	Low Permeability			Transmissive		
ZONE / PHASE	Before	Tech. Perf	After	Before	Tech. Perf	After
Vapor	2	3	0	3	3	0
DNAPL	0	3	0	0	3	0
Aqueous	1	3	0	2	3	0
Sorbed	3	3	0	3	3	0
	I	Key	Equival Equival	ent aqueous ent aqueous ent aqueous ent aqueous	s conc. ~1 s conc. ~1	00 µg/l 0 µg/l
RC IDSS-1, Figur	e 4-2					

This is only the "Source" half of the 14-Compartment Model used in the example. Excavation is assumed to completely remove the source, effectively reducing each compartment to zero. In the "Plume" source, excavation will not result in zeroes for each phase.





Chapter 5 helps the user determine what data are needed to monitor the site to see if the remedy or remedies are performing as hoped/expected.

Specifically, two main questions are addressed in Chapter 5 (questions on slide).



There are three main types of monitoring: performance, process, and compliance. Each type if shown in the slide with a representative example and typical questions the monitoring should answer.

•Performance monitoring (at the top of the slide) assesses the effectiveness of the remedy in meeting the SMART objectives. The figure shows monitoring wells on a transect through the plume. Is the remedy reducing contaminant concentrations? Or, at the end of the day, is the remedy working?

•For process monitoring (on the left hand side of the slide) – the remedial system is being monitored to see if the system is meeting its functional objectives. For example during an ISCO injection, lots of system parameters are measure – pressures in the lines going into the aquifer with oxidant, flow rates, etc. These types of system parameters need to be monitored to make sure that the remedial system is operating properly or to determine if system performance could be improved. Going back to the ISCO example, is one section of a site more contaminated and need for oxidant or visa versa did one section of the achieve cleanup goals faster than expected? By conducting process monitoring, the remedial system can be optimized in the field using these parameters to improve overall performance.

•Finally compliance monitoring (on the right side of the slide) assess where the contamination levels are in comparison to regulatory limits and helps document the extent of the impact and status of exposure (if that is occurring at the site). These location are often selected through dialogue with stakeholders.



Moving to the type of media to monitor, it is important to refer to the functional objectives – they should specify what media to monitor. The potential different types of media include: DNAPL, Aquifer matrix solids (aka aquifer sediment or soil), Soil Gas, Groundwater and Surface Water.

•DNAPL is often not seen at sites although concentrations can be quite high and indicative of DNAPL.

•Aquifer matrix solids can help in establishing baseline contamination levels. During and after remedial efforts, additional samples can be collected to monitor progress. It should be noted that sample representativeness is a limitation. Often small samples are collected and within these small samples there can be significant heterogeneity.

•Soil gas samples are collected if vapor intrusion is pathway of concern and could also be used as a qualitative screening tool to detect DNAPL source areas in the unsaturated zone.

•Groundwater is the ubiquitous media to monitor. Regulations are base on the media and mass flux/mass discharge are measured in these media.

•Surface water can be media to monitor depending on site conditions. For example, when contaminated ground water is discharging to a surface water body.



The metrics for monitoring the media on the previous slide are summarized here.

•Concentration can be for groundwater, aquifer matrix soils, or soil gas.

•Mass of contaminants is typically in SI units – kilograms.

•Mass Flux is grams per square meter per day. Integrated over the area, mass discharge is in units of grams per day. For more information on mass flux and mass discharge, please see the ITRC Mass Flux-1 guidance document and training currently being provided.

ITRC Use and Measurement of Mass Flux and Mass Discharge (MASSFLUX-1, 2010) http://www.itrcweb.org/guidancedocument.asp?TID=82 Internet-based training: http://www.cluin.org/conf/itrc/ummfmd/



After determining what data are relevant to your site, this slide moves into the data evaluation portion of Chapter 5.

•As noted by Chapter 2 speaker, the conceptual site model (CSM) must be maintained and viewed as a living document. As data are collected during remedy implementation, these data should be incorporated in the CSM. This will help improve understand of the site as well as evaluate remedy performance.

•Visualization tools (as shown here) can help the project team as well as stakeholders better understand the site and its progress over time.

•Additionally, statistics can help identify and determine trends.



•Trending – One of most common statistical methods; is way to quantitatively describe the rate at which change is occurring

•Establishes rate at which functional objectives are being achieved and be used predicatively to estimate time required to achieve the objective

•Figure is one from the Chapter 5 that illustrates a decision framework from which to begin the data trend interpretation process

Begin at the text box circled in red

Step 1: Answer the question whether or not plume is being remediated

Step 2: Follow arrow to appropriate contaminant trend; blue - indicating remediation is occurring, or orange - indicating the remediation is not occurring

After establishing the behavior of your monitoring results from this figure you can refer to two tables (5-2 and 5-3) within the document that offer "Possible Interpretations" and "Types of Decisions Needed" based upon the trend.



In addition to data trends, modeling the system can be a helpful and informative exercise. The use of modeling results should be used with other data to make an informed decision. Modeling should not be the sole basis for a decision.

•Source zone models can simulate what the impact of remediation on source zone could be.

•Fate and transport models attempt to model or simulate the 2 and 3 D plume movement. Typically, models are used to evaluate plume stability.

•For free model downloads, REMChlor and NAS (Natural Attenuation Software) are available. Each provides similar analyses and require data through the center line of the plume.





Finally, optimizing monitoring plans must be addressed. Over the timeframe of remedial action operation and into long term monitoring, the monitoring plan should be evaluated. Is the monitoring network still applicable? Are some wells already clean? Do they still need to be monitored? What about the frequency of monitoring? Maybe quarterly sampling isn't required once the plume is decreasing in size. Have the contaminants shifted? Are all analytes required? These are questions that should be asked when compiling monitoring reports and recommendation for changes in the monitoring strategy should be routine.

As with modeling, there are several free tools available online – MAROS and GTS are examples.



Finally, the monitoring strategy should oversee the collection of data with the understanding of how the data are to be evaluated. Will screening tools (right side) be used? Are certain parameters needed for the models? Or will Data Analysis Tools be used? Will all these options be used to feed into the cloud?



Now that a monitoring strategy has been discussed and the basis of data trends, the entire remedy evaluation can proceed in Chapter 6. As shown in the figure, the feedback loop here asks where the remedial strategy is.



Currently, re-evaluation of sites that are not meeting objectives often focuses on technology application without also re-evaluating whether the CSM or the absolute and functional objectives are impeding measureable progress.



If a CERCAL site, does a 5-yr review provide sufficient time for review? Specifically, can progress be seen during the review? Therefore, review periods need to be consistent with timeframe of the functional objectives.



Remedy Optimization important for determining whether best practices have been implemented at the site.


We start looking at the third question for this chapter. "How do I trouble shoot if the functional objectives are not being met at an acceptable rate?"

Basically, you loop back to the top of the flow chart. Back up to the CSM discussion. Let's revisit the purpose of a CSM. A CSM incorporates all the available information from a site into a common understanding. This common understanding provide the basis for decisions – remedies, need for additional investigation, and recognition of uncertainty at the site.



As CSMs at chlorinated solvent site are complex, minor inaccuracies in one or more elements can be multiplicative and compound the error in understanding the site. Typical components of the CSM related to the source zone and plume structure are listed here. You can see how these items are interdependent.



After addressing concerns in Section 2, let's move to Section 3 and revisit the objectives.

•Metrics – do not mesh with functional objectives or could be miss-applied metrics such as using residential standard in an industrial setting.

•Unrealistic expectation of technology performance – remedies for DNAPL were often developed assuming that ONE technology would achieve closure requirements. But we known now these expectations are often not realistic.

• Data do no support objectives – meaning the data do not help evaluate the objectives or determine if the remedy is approaching the functional objectives.

•Regulatory goals and lack of interim objectives go together in that if goals go beyond a generation (as noted previously in this training), then interim goals should be developed to help track process.



Once the objectives are all ironed out, begin troubleshooting the technology.



The information from the three categories on the previous slide come together to make decision regarding whether to:

Continue with existing technology

Optimize existing technology

Cease operation

Transition to another approach



To illustrate the technology implementation decision points, let's cover an example.











The IDSS guidance will improve the management of any remedial project



Benefits of using ITRC Technical and Regulatory Guidance Document: Integrated DNAPL Site Characterization (ISC-1, 2015)

Better performing remedies and improved predictability of plume behavior and risks.

Increased spatial precision and accuracy of characterization data, leading to more accurate CSMs.

More defensible knowledge of contaminant distribution.

Improved selection of remedial measures to address subsurface zones that feed plumes and drive up potential exposure.

Use of real-time field screening tools for site characterization that may minimize the number of permanent monitoring wells, thus providing more optimal use of available personnel and financial resources.

Facilitates communication of site conditions and improves enhanced stakeholder understanding and involvement.

Reduced uncertainty in risk evaluation, remedy selection, and site management decisions, leading to better reductions in risk and protection of natural resources.

Use of real-time field screening tools for site characterization that may minimize the number of permanent monitoring wells, thus providing more optimal use of available personnel and financial resources.





Links to additional resources: http://www.clu-in.org/conf/itrc/IDSS/resource.cfm

Your feedback is important – please fill out the form at: http://www.clu-in.org/conf/itrc/IDSS/feedback.cfm

The benefits that ITRC offers to state regulators and technology developers, vendors, and consultants include:

✓ Helping regulators build their knowledge base and raise their confidence about new environmental technologies

- ✓ Helping regulators save time and money when evaluating environmental technologies
- \checkmark Guiding technology developers in the collection of performance data to satisfy the requirements of multiple states

 \checkmark Helping technology vendors avoid the time and expense of conducting duplicative and costly demonstrations

✓ Providing a reliable network among members of the environmental community to focus on innovative environmental technologies

How you can get involved with ITRC:

 \checkmark Join an ITRC Team – with just 10% of your time you can have a positive impact on the regulatory process and acceptance of innovative technologies and approaches

- ✓ Sponsor ITRC's technical team and other activities
- ✓Use ITRC products and attend training courses
- ✓ Submit proposals for new technical teams and projects