

Voluntary Remediation Program

Allows the applicant(s) to receive a release of liability from all past contamination.

Responsible and non-responsible parties can apply.

Voluntary Remediation Program

All sites are eligible except:

- Permitted hazardous waste units;
- Sites that have been proposed to the National Priorities List (NPL);
- Sites that have been placed on the NPL;
- Motor Fuel Trust Fund eligible sites;
- Sites that have pending federal environmental enforcement actions (not including cost recovery actions) that are related to the proposed voluntary remedial action.

Voluntary Remediation Program

All persons are eligible

- Responsible Persons must remediate the site to RECAP standards. Partial Remediation not allowed
- Non-responsible parties can perform a partial remediation
 - The definition of responsible party for the VRP is different than that for other Chapter 12 sites.

Applications

- Voluntary Remedial Investigation
 - Application Form (VCP001)
 - \$500 Application Fee
 - Investigation Work Plan
- Voluntary Remedial Action
 - Application Form (VCP002)
 - \$500 Application Fee
 - Voluntary Remediation Application
- Partial Remediation Supplemental (VCP003)

VRP Investigation Work Plan

Area to be investigated is defined by the legal description of the property identified in the application.

Off site investigation is not required in the VRP.

If the AOC extends off-site which requires further investigation or remediation, it is done outside of the VRP process.

VRP Investigation

Analytical parameters required at all sites are RECAP volatiles, semivolatiles and metals.

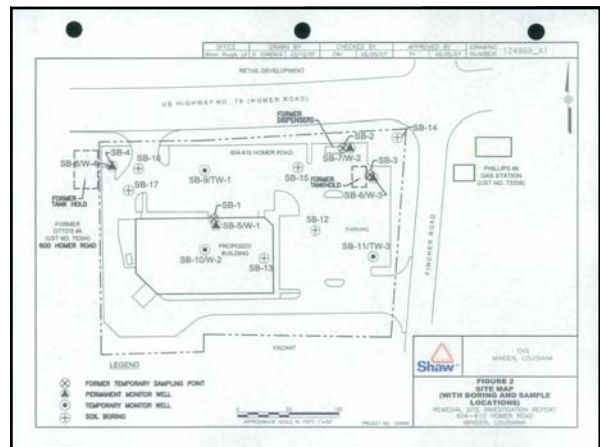
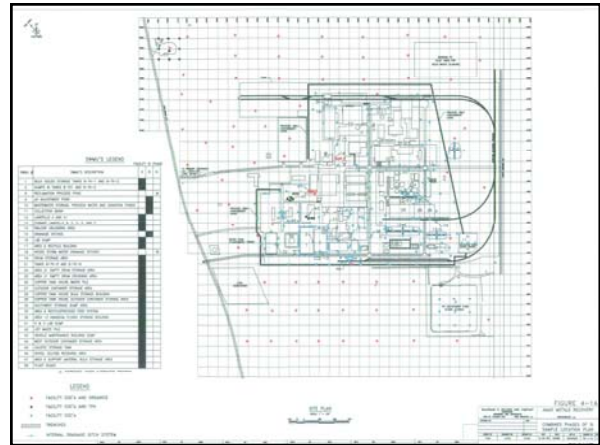
Other parameters will be added as needed, such as PCB's, pesticides, depending on site information and team leader judgment.

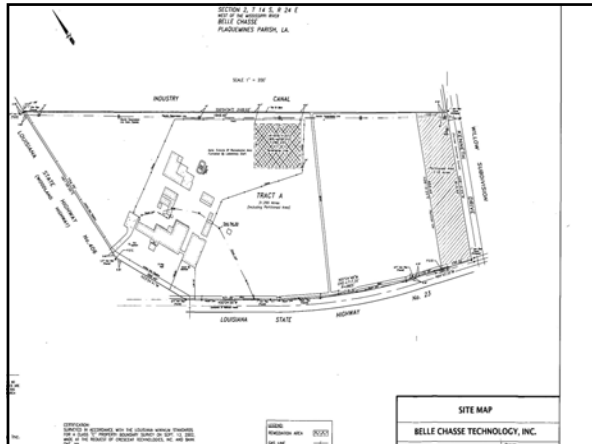
VRP Investigation

- If partial remediation is being considered, you may want to assume GW1 and not attempt to classify further.
- Use of 95% UCLs
- Space-weighted averaging
- 10^{-4} to 10^{-6} risk range

VRP Investigation

RECAP	VRP
<ul style="list-style-type: none"> • AOI defined by impacted media • Sample parameters can be reduced based on history • Number of samples defined by AOI 	<ul style="list-style-type: none"> • AOI defined by the defined property boundaries • Analysis for RECAP Volatiles, Semivolatiles and metals, at a minimum • Number of samples defined size of property in the VRP and historic information on releases





VRP Investigation Report

- Investigation Report must define the nature and extent of contamination at the VRP site.
- This is not necessarily a RECAP report.
- Remedial goals may be identified in VRA.

VRP Remedial Action

- Application shall define the “site” which is to receive the Certificate of Completion.
- Remediation can be either Complete or Partial
- Application must include an approved investigation report.
- If acceptable, the Remediation Work Plan is approved by team leader for public comment

VRP Remedial Action

Complete Remediation

- Remediate all contamination at the site to industrial or non-industrial standards.
- No use restrictions on property.
- Conveyance notice required if remediated to industrial standards.
- Requirement for responsible parties.

VRP Remedial Action

Partial Remediation

- Remedy must be protective for the intended use of the property.
- This, along with use restrictions, allows ICs to be used as a remedy.

VRP Remedial Action

Partial Remediation

- Use restrictions on property are required.
- Partial Remediation Agreement required for future access.
- Only available to non-responsible parties, as defined in Part 2 of Chapter 12 of the EQA.

VRP Remedial Action

Partial Remediation

- Use restrictions are identified in the Remedial Action Plan.
- Conveyance notice contains use restrictions as well as the Partial Remediation Agreement.
- A Partial Remediation can become a Complete, but a Complete cannot become a Partial. (must submit a partial for public comment)

VRP Remedial Action

Remedial Action Report

- After implementation of the plan, a remedial action report is submitted
- Report should demonstrate that remedial goals identified in the VRAP were met.
- Report approved by team leader.

VRP Remedial Action

<p style="text-align: center;">RECAP</p> <ul style="list-style-type: none"> • AOI defined by impacted media • Remediation of all risks required • Engineering/Institutional controls generally not acceptable. 	<p style="text-align: center;">VRP</p> <ul style="list-style-type: none"> • AOI defined by the defined property boundaries • Remediation of risks for intended use acceptable. • Engineering/Institutional controls may be used to eliminate exposure pathway. Use Restrictions required for partial remediation
--	--

