



**Traditional LDEQ Oversight (aka RECAP) vs.
Voluntary Remediation Program (VRP)**

RECAP Investigation (Phase II ESA)	VRP Investigation (Phase II ESA)
<ul style="list-style-type: none"> ▪ Investigation focused on areas with either documented contamination from previous sampling or suspected of being contaminated based on current or previous activities (recognized environmental conditions) ▪ Where samples are collected and what they are analyzed for is dependent on recognized environmental conditions at the site 	<ul style="list-style-type: none"> ▪ Area of investigation is define by the site boundaries (as described in the application by the applicant) ▪ Requires more thorough analysis of samples; at a minimum: <ul style="list-style-type: none"> – RECAP volatiles – RECAP semivolatiles – RECAP metals – Other contaminants based on the recognized environmental conditions at the site ▪ Samples are collected to assess the entire site (as defined in the application) as well as any specific areas of concern
RECAP Remediation	VRP Remediation
<ul style="list-style-type: none"> ▪ Area to be remediated based on the results of the RECAP Phase II ESA ▪ Remediation of all risks is required, e.g. any contamination that is above RECAP standards needs to be remediated ▪ Engineering/ institutional controls generally not acceptable 	<ul style="list-style-type: none"> ▪ Area to be remediated based on the results of the VRP Phase II ESA ▪ Remediation can be tailored for the intended future use of the site ▪ Engineering/Institutional controls may be used to prevent exposure to contamination (as opposed to removing contamination or reducing the levels of contamination)
RECAP Final Result	VRP Final Result
<ul style="list-style-type: none"> ▪ No further action at this time (NFA) letter from LDEQ ▪ Site may be reopened in the future (for example, if LDEQ lowers the RECAP standards) 	<ul style="list-style-type: none"> ▪ Certificate of Completion (COC) for the entire site defined in the application ▪ Release of liability from all past contamination at the site (transferable to future site owners)

Acronyms:

COC: Certificate of Completion

LDEQ: Louisiana Department of Environmental Quality

NFA: No Further Action (at this time – letter from LDEQ)

Phase II ESA: Phase II Environmental Site Assessment: Soil and/or groundwater samples are collected and analyzed to determine if contamination is present at the site, and if so, the nature and extent of contamination.

RECAP: Risk Assessment/ Corrective Action Program

VRP: Voluntary Remediation Program