

**CONSULTANTS' DAY 2015**

**Site Closure  
Tips and Concerns**

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20th Anniversary  
DNR's  
Remediation  
& Redevelopment  
Program

Hosted by DNR's  
Remediation & Redevelopment Program



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**Key Points**

Best results = Complete submittal

- Call the PM with questions first
- Answer all questions - thoroughly
- Submit all required maps/figures/tables
- Identify all continuing obligations
- Use current RCL's
- Show cumulative impacts



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**NR 726 Closure Submittals**

Explain WHY a question is not relevant to your case

- Do NOT use 'Not Applicable'



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**NR 726 Closure Submittals**

Incomplete site investigations

- Define extent for all media
- Include complete history
- Assess vapor intrusion
- Sample in upper 4 feet for DC
- 8 quarterly groundwater samples



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**NR 726 Closure Submittals**

- Sample results on maps
- Property boundaries on maps
- Document COs with photos
- Data tables must be legible
  - use multiple tables
- Isoconcentration lines



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**NR 726 Closure Submittals**

- GIS Registry Documentation
  - P. 5/Table 5: Identify all residual contamination and continuing obligations options
  - Attachments A-C always apply, D-G required if COs applied
  - If NA, explain why not included



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**NR 726 Closure Submittals**

- Document efforts taken to locate monitoring wells
- Include:
  - well construction logs
  - well location map
  - deed for each property



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**NR 726 Closure Submittals**

- Maintenance Plan (p. 5, p. 7)
  - Add the site specific information to the template
  - Form 4400-305 inspection log
  - Include photographs (baseline)
  - Simple plan for MWs



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**NR 726 Closure Submittals**

NR 725 notification letters

- Residual contamination
- Continuing obligations
- DRAFT guidance for vapor COs





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**NR 726 Closure Submittals**

Parties receiving NR 725 notifications

- Source property owner
- Off-source Property owners
- ROW holders
- Occupants, as appropriate





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**NR 726 Closure Submittals**

**DRAFT Case Closure GIS Registry**

SPR15 No. \_\_\_\_\_ Agency (DRI) Name \_\_\_\_\_ Page 15 of 11

Notifications to Owners of Affected Properties (Mandatory) (3)

Please fill spaces for all NR 725 in the box to check a box under "Letter Sent" or "Response Letter Sent" columns.

ID	Address of Affected Property	Planned ID No.	Date of Receipt of Letter	Type of Property Owner	NTWK	NTSW	Response Notification Letter Sent
A							
B							
C							
D							





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**NR 726 Closure Submittals**

Continuing Obligations-notification required:

- Groundwater meets or exceeds ES
- Soil meets or exceeds RCLs
- Monitoring Well abandonment
- Cover or barrier
- Structural Impediment
- Industrial RCLs applied
- Site Specific Condition



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**NR 726 Closure Submittals**

Vapor COs: notification required

- Vapor Mitigation System required
- Dewatering system needed for VMS
- Compounds of Concern in use – future use limited to current operations
- Commercial/Industrial exposure assumptions used (property use limited)
- Residual volatile contamination poses risk for future construction



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**NR 726 Closure Submittals**

Signatures and Findings for Closure Determination

- See the pop-up boxes for a determination of whether a hydrogeologist and/or engineer signature is needed



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### NR 726 Closure Submittals

- First Box Pop-up:  
If a response action addresses groundwater contamination, the closure request must be prepared by a professional engineer and a hydrogeologist, and must include both signatures.



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### NR 726 Closure Submittals

CDs: submit one initial, one final

- submit a final CD after all changes have been made
- organize the file consistent with the closure form format
- final CD/paper copy must match



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### NR 726 Closure Submittals

- CD Labeling

Files Currently on the Disc (8)	Files Currently on the Disc (13)
Attachment A - Data Tables	Attachment B - cover page
Attachment B - Maps and Figures	Figure B.1.a - Site Location Map
Attachment C - Documentation of Reme...	Figure B.1.b - Detailed Site Map
Attachment D - Maintenance Plan(s)	Figure B.1.c - RR Site Map
Attachment E - Monitoring Well Informa...	Figure B.2.a - Pre-remedial Soil Contami...
Attachment F - Notifications to Owners ...	Figure B.2.b - Post-remedial Soil Contam...
Attachment G - Source Legal Documents	Figure B.2.c - Pre-Post Remaining Soil Co...
Case Closure - GIS Registry Form	Figure B.3.a - Geologic Cross-Section Fig...
	Figure B.3.b - Groundwater Isoconcentrat...
	Figure B.3.c - Groundwater Flow Directio...
	Figure B.3.d - Monitoring Wells
	Figure B.4.a - Vapor Intrusion Map
	Figure B.4.b - Other media of concern (e...



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