Post Closure Modifications and Reopeners

Pam Mylotta
Southeast Region Team Supervisor
Wisconsin DNR

Hosted by DNR’s Remediation & Redevelopment Program
Key Points

- What is a post closure modification
- Legal authority
- When to submit a request
- Fees
- Process
- Reopening Sites
Post Closure Modifications

• Post Closure Requests:
  Submit for sites where an action will result in changes that would affect a continuing obligation, including residual contamination
Post Closure Modifications

• Required vs. Voluntary Notifications
  – Required under NR 727.07 or in closure letter – 45 days prior
  – Otherwise voluntary, but recommended
Post Closure Modifications
Post Closure Modifications

- FEES (per site)
  - $1050
  - $300 (Soil)
  - $350 (GW or MW)
Post Closure Modifications

• Process
  – Submit request with fees (form)
  – Notice to proceed
  – Take the approved actions
  – Submit documentation
  – Addendum to closure letter
Post Closure Modifications

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request (Form 4400-237)


Post-Closure Modifications [181] - NR 727

Post-Closure Modifications: Modification to or removal of a site or property from the GIS Registry (this includes modifications to continuing obligations and/or modifications to property boundaries). Include a fee of $1050, and:

- Include a fee of $300 for sites with residual soil contamination; and
- Include a fee of $350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).
Post Closure Modifications
Post Closure Modifications
Reopeners: NR 727.13 criteria

• Risk to health, safety, welfare or to the environment
• Noncompliance with continuing obligations
• By request
Same Fees as modifications

Different process:

- Investigation
- Remedial action
- Closure request/approval
Pending guidance

- RR 982: Post Closure Modifications and Reopening Sites
**PCM**: Actions affecting CO, including residual contamination

- Fees: $1050 + $300* + $350*
- Addendum to closure letter

**Reopeners**: same fees, different process. New closure letter.
# Post Closure Modifications

## Fees

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<tr>
<th>Voluntary PCM</th>
<th>Required PCM</th>
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Summary of Key Points

- Legal authority
- When to submit a request
- Fees
- Process
- Reopening Sites
Questions & Contacts

Pam Mylotta
Southeast Region Team Supervisor

Pamela.Mylotta@wicounty.gov

414-263-8561