



Department of  
Environmental  
Conservation

# Site Management

## When, Why, How

April 19, 2016

# Overview

What is Site Management?

Why is it Important?

How to development a Site Management Plan

Implementation

# What is Site Management?

Implementation of procedures that ensure that all remedies are operated, maintained and monitored regularly to fully protect human health and the environment.

Required for any BCP site that is not a Track 1 remedy

*May include (and is not limited to):*

- O&M of active remedial systems
- Maintenance of passive systems
- Monitoring of media



# What is Site Management - Cont'd

Other elements include:

- Ensuring Development is performed in a protective manner
- Ensuring adherence to institutional controls
- Documenting all of the above
- Certifying all of the above

# When does Site Management start?

**Unofficially - the day Remedial Action construction is completed**

**Officially - The day you receive your COC**

**The first Reportable Period will be 15 months from the COC issuance date**

# Why is Site Management Important?

Protects the structural aspects  
(engineering controls)

Protects the people that use  
the property

Protects the environmental  
media from further damage

It protects YOUR investment



# How to develop a Plan for Site Management

Use the template!!!!

Template dated April 2015 is now on the Public Website

Revisions to the template:

- Reorganized
- Executive Summary provides the essence of the Site-specific SM
- Includes provisions for Climate Change Vulnerability Assessment and Green Remediation Evaluations
- Provisions/Criteria for performing a Remedial System Optimization
- Appendices have been expanded



# Why Use the template?

- Provides framework for site-specific plans and reports
- Shortens development & review times
- Reflects DEC's experience in all remedial programs (and is used by all remedial programs)
- Standard language acceptable to DEC

Not all Sections may be applicable to the site, if so, remove them or state "N/A"

# Elements of a Site Management Plan

- Background and Implemented Remedial Program
- Areas of Remaining Contamination
- Engineering / Institutional Control Plan
- Monitoring Plan (Media & Cover)
- Operation & Maintenance Plan (Active systems)
- Periodic Reporting & Certifications

# Items of Note

## Notifications:

60 day advance notification of:

- Transfer of Title
- Erection of structure
- Creation of park, etc.
- Any Activity that may increase potential exposure or interfere w/ remedial program

# Items of Note Cont'd

## Notifications:

### Emergency Conditions

Oral notification to DEC by noon the following day

Written - within 7 days

Ground Intrusive Work that requires implementation of an EWP-15 Day advance notification

# Implementation of Site Management

- SMP is approved in advance of the FER/COC Issuance
- FER is approved in conjunction with COC Issuance
- First Certifying Period is 15 months from the issuance of the COC (annually thereafter, unless otherwise approved for a 3 or 5 year period by DEC)
- Periodic review report and signed certification form is due 30 days after end of Certifying Period

# Implementation Cont'd

## Periodic review report

Documents included as the basis for the IC/EC certification:

### Summary of

- the inspections,
- the monitoring data,
- an analysis of data,
- repairs / maintenance performed,
- recommendations for needed actions

CERTIFICATION that all items required by the SMP were performed (see DER-10 Section 6.3(d) for language)

# Consequences of not adequately performing SM

Loss of COC!!!!

Loss of tax Credits!!!!

Repayment of tax credits given!!!!



# Wrap – Up

Develop the SMP while performing the Remedial Action

Use the template

Perform the site–specific necessary SM elements

Report and Certify

Notify the DEC when site use changes (ownership, re-development)

# Thank You

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