



Department of
Environmental
Conservation

Site Management

When, Why, How

May 22, 2019

Overview

What is Site Management?

Why is it Important?

How to develop 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 or Track 2 Residential 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

- If these dates are far apart, you may enter Interim Site Management

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



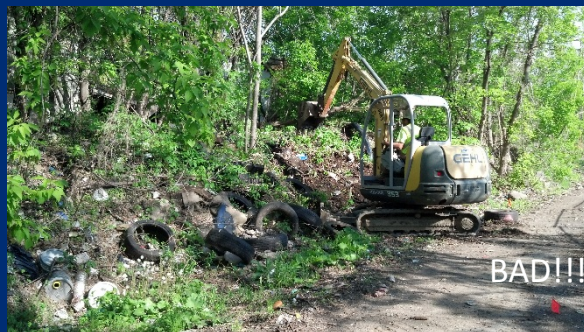
Why is Site Management Important?

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!!!! Current template is dated August 2015

Template (SMP template II) for sites with ICs only is available for use -dated January 2016

Use the SMP checklist and submit it to your DEC PM

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/Inspection Plan (Media & Cover)
- Operation & Maintenance Plan (Active systems)
- Periodic Reporting & Certifications

SMPs: Common Mistakes

- SMP is late or incomplete
- SMP is not adequately proofread
- Appendices are not included with the draft SMP
- SMP does not follow the template
- Remedial action objectives differ from those in the Decision Document
- Site conditions are copied from RI Report, instead of summarized
- Inspection form(s) is missing

SMPs: More Common Mistakes

- As-built drawings and cut sheets are missing
- Cut sheets do not identify installed equipment
- Inspection or reporting schedules are missing
- No plans to collect and report data needed to evaluate remedy performance
 - How much mass is recovered or destroyed?
- Property description in SMP differs from the description in application

Items of Note

Notifications:

60 day advance notification of *Change of Use*:

- Transfer of Property Title
- Transfer of COC
- Erection of structure
- Creation of park or other recreational facility
- Any Activity that may increase potential exposure or interfere with remedial program

Notify DEC when owner's address changes – common oversight



Items of Note Cont'd

Notifications:

Emergency Conditions

Oral notification to DEC by noon the following day

Written - within 7 days

Summarize actions taken or to be taken, and potential impact on environment and public

Ground Intrusive Work that requires implementation of an Excavation Work Plan - 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
- SMP is a living document – revise SMP if making changes to Site Management (ex. sampling frequency)
- Conduct inspections at frequency specified in SMP, even if Periodic Reviews are less frequent

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!!!!



Summary

- 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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