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MEMORANDUM

TO: Responsible Parties, Environmental Service Providers, and Consultants

FROM: J. Scott Bullock, UST Section - Corrective Action Branch Head and *JSB*
Z. Vance Jackson, UST Section - Trust Fund Branch Head *ZVJ*

RE: Working Template for 2017 Reasonable Rate Document Task 6.090/6.091
Monitoring Reports and Task 6.105/6.106 Corrective Action Performance Reports

Recent changes to the 2017 Reasonable Rate Document modified the routine corrective action monitoring reports by creating a new report defined as the “Corrective Action Performance Report” (Task 6.105/6.106) while also reducing the eligible rate for the existing Monitoring Report (Task 6.090/6.091).

These changes result from the separation of the two core components of the Monitoring Report, each into its own document: one covering the evaluation of the mechanical effectiveness of an active remediation system on recovering or reducing soil and/or ground water contamination, with the other focusing on the ongoing monitoring of the contaminant plume extents and maintaining an updated site risk determination. The primary difference between these reports and the previous report format (based on Appendix A, Template #9 in the UST Section’s *Guidelines for Assessment and Corrective Action for UST Releases*,) is that Sections G and H have been removed from the new Monitoring Report (presented here as Template #9A) and used to create the Corrective Action Performance Report (presented here as Template #9B).

In the new Monitoring Report (#9A), a section was created to help track the effectiveness of monitored natural attenuation using the results from routine monitoring over that phase of the remediation schedule. In the new Corrective Action Performance Report (#9B), the existing evaluation requirements for each medium have been tied to contaminant mass calculations relative to baseline estimates. In both reports, the licensed professional seal section has been reworked into a table outlining a series of positive or negative assertions and associated comments to more explicitly define what the professional is certifying.

Additionally, two new tables have been created, for use where applicable. Table B-11 is a guide on how to report any air/vapor analytical results as part of either the tracking of system emissions for mass removal calculations or to monitor in situ reduction strategies via soil gas sampling, etc. Table B-12 provide a template for tracking the effectiveness of a remedial strategy

at removing contaminant mass in relation to the milestones that were provided in the Corrective Action Plan (CAP) and agreed upon by both the UST Section and the responsible party through the completion of the CAP Record of Decision.

[It should be noted that, within the Trust Fund Branch "2017 RRD Price List", the difference between the 'Initial' and 'Subsequent' versions of these reports represents an added cost for the extra effort to initially set up a new site into this report format, including fleshing-out the relatively stable Site History sections, etc. Subsequent reports that are essentially amendments to this template are then reimbursed at a lower cost. For sites that are already operating under the existing Template #9, much, if not all, of this setup will have already been done for both reports, so no new 'Initial' report may be necessary.]

One exception would be for sites under active remediation where the initial CSA and/or CAP did not include contaminant mass calculations and/or no cleanup progress milestones were provided. For those sites, any tasks necessary to obtain information for those determinations may be preapproved, with the additional efforts to formally document the new baselines and projected milestones in a report covered by using the applicable 'Initial' report format.]

As of this date, both report templates and the associated tables represent a working change to the existing 2008 *Guidelines for Assessment and Corrective Action for UST Releases*, and will be more fully incorporated into the new version of that document scheduled for release later this year. Until that new document is published, we welcome any questions about their use, as well as comments that could help us improve the versions that will be included within the new edition of these Guidelines. Please contact your Regional Office, or Jared M. Edwards in the UST Section Central Office at 919-707-8153 or jared.edwards@ncdenr.gov, to offer suggestions or seek assistance with any of these documents.