



ROY COOPER
Governor

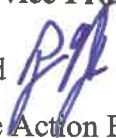

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

February 15, 2018

MEMORANDUM

TO: Responsible Parties, Environmental Service Providers, and Consultants

FROM: Z. Vance Jackson, UST Section Chief, and 
J. Scott Bullock, UST Section - Corrective Action Branch Head 

RE: Stepwise Corrective Action Plan - Feasibility, Design, Decision
Working Draft for Use and Public Comment (Tasks 6.065, 6.066, 6.067)

Changes to the Reasonable Rate Document (RRD) in 2017 modified the reimbursement of Corrective Action Plans (CAP) by redefining the process as a three-step document consisting of:

1. A Corrective Action Feasibility Study (Task 6.065) evaluating the remedial technology/technologies proposed in the 'Conclusions and Recommendations' section of the Comprehensive Site Assessment (or via a New Technology Cleanup Plan);
2. A Corrective Action Design (Task 6.066) applicable where the proposed technology requires a formal engineered design and multi-vendor bid review for fabrication and installation of the treatment system; and
3. A Corrective Action Record of Decision (Task 6.067) documenting the proposed remedial schedule and evaluation metrics, with multi-party certification confirming the applicable stakeholders agree with the proposed remedial strategy as presented in all three steps of this revised Corrective Action Plan process.

Accordingly, the UST Section has drafted additional Corrective Action Plan templates intended to assist the regulated community by outlining the information that is being requested within each of these steps. These proposed templates represent both a draft for review and public comment, as well as a working change to the existing 2008 *Guidelines for Assessment and Corrective Action for UST Releases* (or ACA Guidelines). For any given site, recommended amendments to any of the templates by any member working within the three-step, group process (responsible party, consultant, engineer of record, or UST incident management or technical auditing staff) should be discussed openly within the group and incorporated, where appropriate due to site-specific conditions, into the applicable document.

Please note that this approach is required only for UST incident sites that are eligible for, and seeking reimbursement from, the Commercial Leaking Underground Storage Tank Cleanup

Fund for the Corrective Action performed onsite. For sites that are ineligible, or where reimbursement for Corrective Action is not anticipated, the unitary Corrective Action Plan format, presented in Template #7, Appendix A, of the 2008 *ACA Guidelines*, would still apply. For sites with existing Corrective Action Plans, please review the Department's April 13, 2017 memo on the new Monitoring and Corrective Action Performance Reports (2017 RRD Tasks 6.090/6.091/6.105/6.106) for additional guidance on defining cleanup schedules and milestones at currently-active sites.

The UST Section welcomes any questions about these documents and the three-step CAP process, as well as any public comments or recommendations to help improve final versions of these document templates, which will be included within an upcoming edition of the *ACA 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 these templates or any other UST Section guidance documents.