Site Name _____
Location _____
Name and Date of Document _____
Preparer/Reviewer_____

Component Checklist –Remedial Action Plan (RAP)
REC Rules (15A NCAC 13C)

Note: Information in italics is from the latest REC Program Implementation Guidance (Guidance) that can be found on the IHSB website. ***Please remember that the REC Rules supersede any guidance. This checklist should only be used as a supplement to the REC Rules and all guidance documents.***

NOTIFICATION REQUIREMENTS:

Report to REC Program staff within 24 hours upon discovery of any of the following, if applicable [.0305(b)(2)&(3)]:

- _____ an imminent hazard at the site
- _____ off-site migration of hazardous substances
- _____ the presence of sensitive environments
- _____ mixed chemical & radioactive wastes

PROPOSED RAP EVALUATION AND DOCUMENT CONTENT - [0306(l)]:

See Guidance for options for combining certain documents with the RAP.

_____ .0306(l)(1) **RI results.** Discuss and summarize RI results including media contaminated, contaminants of concern, and the areal and vertical extent of contamination.

_____ .0306(l)(2) **Remedial action objectives.** *Summarize the areas to be remediated, the affected media and contaminants of concern, and the remedial design goals, including preliminary remediation goals.*

_____ .0306(l)(3) **Feasibility study.** Provide evaluation of available remedial alternatives using the following feasibility study criteria:

(A) Protection of human health and the environment, including attainment of cleanup levels;
(B) Compliance with applicable federal, state and local regulations;
(C) Long-term effectiveness and permanence;
(D) Reduction of toxicity, mobility and volume;
(E) Short-term effectiveness, i.e., effectiveness at minimizing the impact of the site remedial action on the environment and local community;
(F) Implementability, i.e., technical and logistical feasibility, including an estimate of time required for completion;
(G) Cost; and
(H) Community acceptance.

At least three technologies or combinations of technologies should be evaluated after screening all potentially applicable technologies. A detailed analysis must be performed on each using the above eight evaluation criteria. A comparative analysis of the remedial alternatives must be performed with each ranked in order of preference. Note: Physical barriers are the least favored option for site remediation.

_____ .0306(i) **Branch concurrence is required for the following proposed remedies:**

(1) A remedy conducted entirely on site and for which a permit waiver is desired under N.C.G.S. 130A-310.3(e);
(2) On-site containment or capping, *including land-use restrictions*; or
(3) An exceedance of $3 million cost.

_____ .0306(l)(4) **Detailed description of proposed remedy.** Include conceptual (*preliminary)* design of proposed remedy, including process flow diagrams and pre-design drawings of all major components of the treatment train. *Note: Final design plans and specifications are submitted later as part of preconstruction report unless the documents are combined. See Guidance for more info.*

_____ .0306(l)(5) **Justification for selection of proposed remedy.** A demonstration must be made that the proposed remedy is supported by the feasibility study. *See Guidance for more information*.

_____ .0306(l)(6) **Activities necessary for implementation.** Describe activities required to implement remedy that comply with applicable laws and regulations and performed in a manner such that cleanup standards are met. Activities include, but are not limited to, well installation and abandonment, sampling, run-on/run-off control, discharge of treated waste streams, and management of investigation and remedial action derived wastes.

_____ .0306(l)(7) **Proposed treatability studies and additional site characterization.** Describe any that is/are necessary to support final design.

_____ .0306(l)(8) **Procedures and schedule for remedial action.** Describe procedures and schedule for additional site characterization, treatability studies, final design, construction, operation and maintenance, system monitoring and performance evaluation, and progress reporting.

_____ .0306(l)(9) **Proposed criteria for remedial action completion.** Describe criteria for RA completion, including procedures for post-remedial and confirmatory sampling. *A work plan for monitoring and evaluating the remedy's performance must also be included with performance results submitted in remedial action progress reports.*

_____ .0306(d)& (l)(10) **<u>Community</u> health and safety plan.** Mention how the health and safety of nearby residential and business communities will not be adversely affected by activities related to the remedial action. E*nsure that the plan includes measures to protect the surrounding community from exposure to site contaminants. The scope and detail of measures shall be commensurate with the degree and nature of risks posed. See .0306(d) of REC Rules for items to consider.*

_____ .0306(l)(11) **Decontamination procedures.** Describe for equipment and personnel.

_____ .0305(b)(10) .0306(q) **Removal of hazardous waste from site.** Include discussion of how remedial action-derived wastes will be managed in a manner that provides for the protection of human health and the environment and that complies with all applicable federal, state, and local laws, rules, and regulations (*see Guidance*).

<u>SCHEDULE AND CERTIFICATIONS:</u>

_____ .0306(b)(1-2) **The Proposed RAP has been properly certified by the RP and RSM.** *Ensure proper document certification (Forms DC-1 and DC-II in Appendix G of the Guidance), notary and dates. <u>Ensure that date of RSM signature follows date of RP signature.</u>*

_____ .0302(l) **RAP will be/is submitted to the Branch within 30 days of certification. All documents to date have met the milestones identified in .0302(l)(1-3).**

_____ .0306(j) **The REC will provide <u>public notice</u> for the Proposed RAP following certified document submittal.** *See section .0306(j) of the Guidance for instructions*.

_____ .0306(b)(5)(C) **The RAP work phase completion statement will be completed after contacting REC Program staff following conclusion of a public notice period.** *Note: This certified statement (WPC-III) is submitted **after** public notice of the proposed RAP has been completed and all comments, if any, received have been properly addressed by the REC. The work phase completion statement WPC-III must be accompanied by document certification forms DC-1 and DC-II.*

_____ .0306(b)(4) **RAP implementation/remedial construction will not begin until work phase completion statement WPC-III is submitted to REC Program staff.**