

6. STATE CLEANUP PROGRAM

6.1 Purpose and Scope

The State Cleanup Program (SCP) (www.IN.gov/idem/4179.htm) was created by IDEM in 1989 to manage the investigation and remediation of sites contaminated with hazardous substances or petroleum which are not included in the federal Superfund Program. The SCP was modeled after the federal Superfund Program; however, the SCP differs from the Superfund Program in some respects. The SCP has jurisdiction over remediation of petroleum releases in addition to remediation of releases of hazardous substances. Also, the SCP follows aspects of the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP), 40 Code of Federal Regulations (CFR), Part 300, (www.epa.gov/superfund/policy/index.htm) as well as the *Remediation Closure Guide (Waste-0046R1)* (www.IN.gov/idem/4694.htm). By applying components of the NCP and the *Remediation Closure Guide*, the SCP can handle sites of the same environmental magnitude as Superfund Program sites, using a more streamlined approach.

The SCP is administered by the State, with no federal involvement or funding. Funding for the SCP comes from the Hazardous Substances Trust Fund which primarily receives its revenue from taxes on disposal of hazardous wastes and recovery of IDEM oversight costs. Examples of remediation projects managed under the SCP include dry cleaning facilities, manufacturing facilities, petroleum refineries, petroleum storage terminals, abandoned landfills, unregulated underground storage tank sites and other industrial sites.

6.2 Rules and Laws

The legal authorities listed below for the SCP can be viewed at the Indiana General Assembly website (www.IN.gov/legislative/ic_iac).

The Hazardous Substances Response Trust Fund (*IC 13-25-4*) is utilized for cleaning up sites contaminated with hazardous substances. It also establishes liability for potentially responsible parties/persons (RPs) to undertake investigation and remediation of hazardous substance releases. In addition, *IC 13-25-4* states that IDEM may recover the costs of removal or remedial actions when such actions are performed in a manner consistent with the NCP (*40 CFR Parts 300-399*). *IC 13-24-1* authorizes IDEM to require cleanup of petroleum contamination. Both *IC 13-25-4* and *IC 13-24-1* permit IDEM to enter into Agreed Orders (AO) with RPs involved in releases of petroleum or hazardous substances.

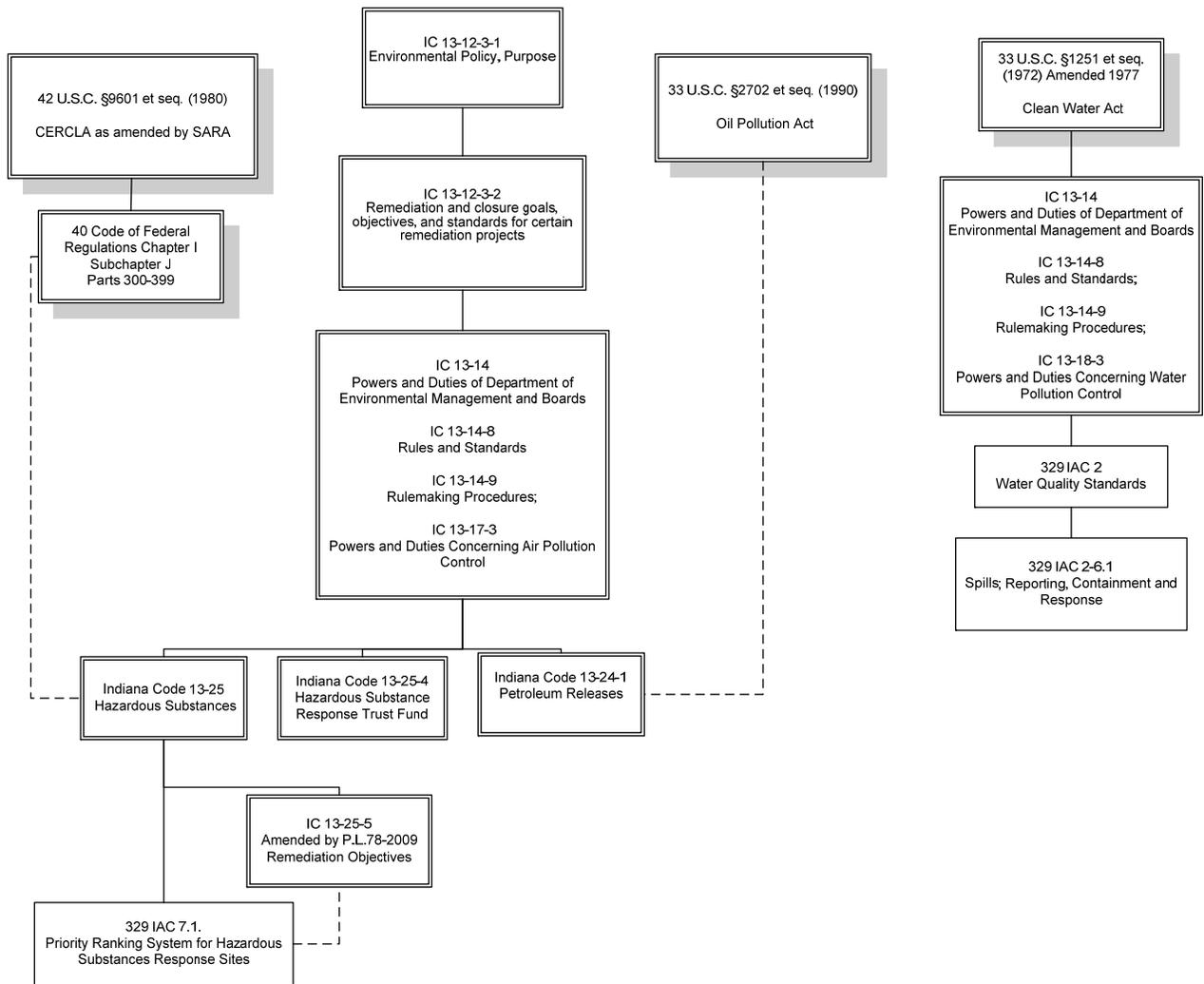
Indiana Statutes and Rules

- IC 13-25-4 *Hazardous Substances Response Trust Fund* states that IDEM may recover the costs of removal or remedial actions when such actions are performed in accordance with the NCP.
- IC 13-24-1 Authorizes IDEM to require cleanup of petroleum contamination.
- IC 13-25-4 and IC 13-24-1 Permit IDEM to enter into AOs with responsible parties/persons.
- 329 IAC 7-1 *Priority Ranking System for Sites Subject to Remediation*

Nonrule Policies

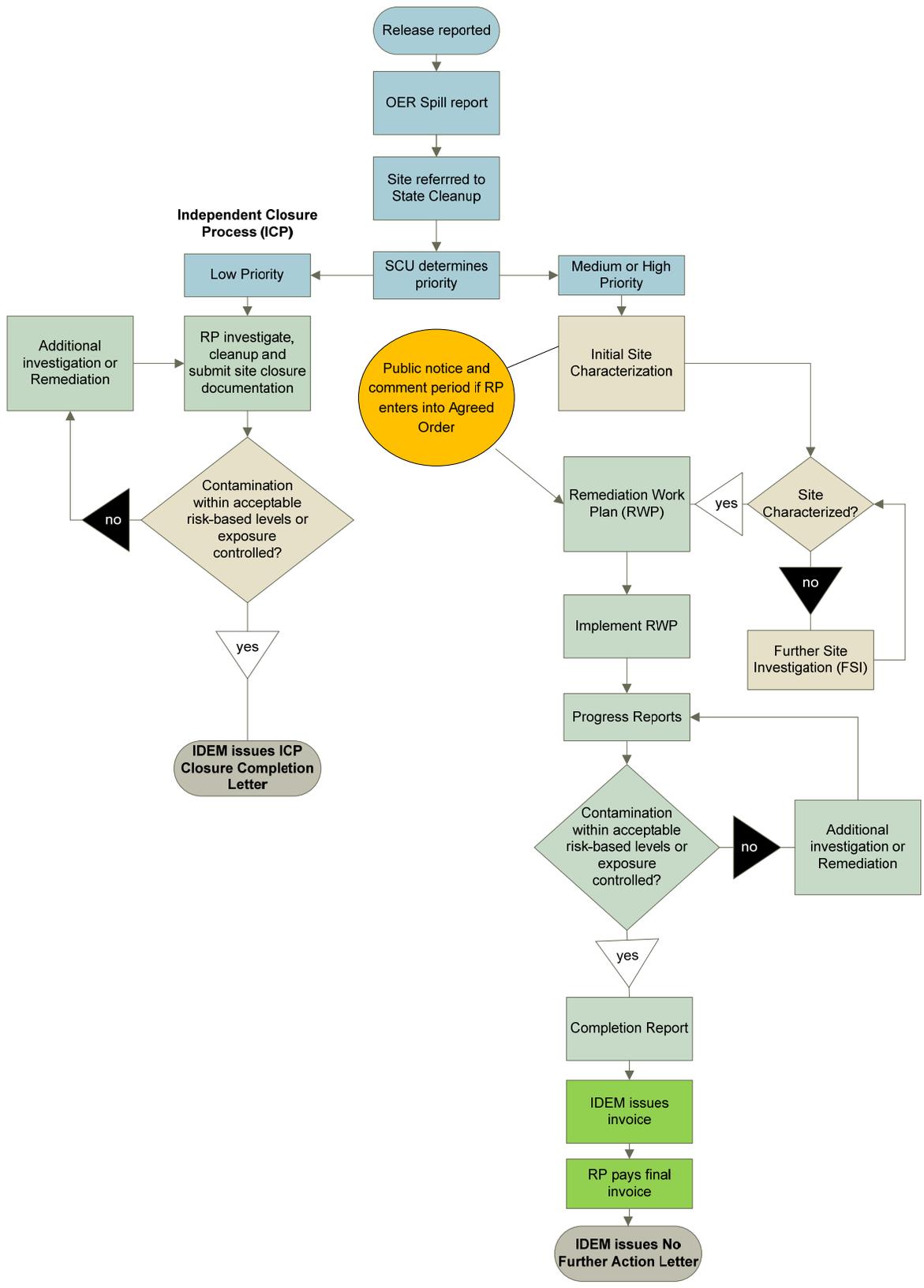
- *Remediation Closure Guide (Waste-0046-R1)* (www.IN.gov/idem/4694.htm) provides technical guidance for screening a site, assessing risk, and establishing remediation objectives.

Figure 6.1 Laws and Rules Related to State Cleanup



6.3 Process Overview

Figure 6.2 State Cleanup Program Process Overview



6.4 *How Does a Site Enter the Program?*

6.4.1 **Site Referral**

The State Cleanup Program (SCP) receives site referrals from IDEM Emergency Response, other IDEM Remediation Services Branch programs, other IDEM Offices, the IDEM Complaint Clearinghouse and local health departments. Below are examples of sites referrals to State Cleanup:

- By IDEM Emergency Response – Emergency Response (ER) refers sites to the SCP when long term cleanup management and oversight is necessary.
- By IDEM Voluntary Remediation Program (VRP) – The VRP refers sites to the SCP if the VRP applicant does not complete the obligations of the Voluntary Remediation Agreement and is terminated from the VRP, or if imminent threats to human health or the environment exist.
- By IDEM Site Investigations (SI) Program – The SI Program refers sites to the SCP after completion of site assessment under CERCLA, if it has been determined that the site does not qualify for inclusion on the NPL.
- By Indiana Brownfields Program (IBP) – The IBP refers sites to the SCP while in the process of Phase II activities and comfort letter review when off-site contamination is encountered or emergency threats are encountered.
- By IDEM Office of Water Quality – The Drinking Water Section of the Office of Water Quality refers sites to the SCP after it is determined that a private or public drinking water source has been contaminated above the MCL.
- By IDEM Complaint Clearinghouse – The IDEM Complaint Clearinghouse (www.IN.gov/idem/5274.htm) is available daily to receive complaints about contamination from the public. The IDEM Complaint Coordinator will refer a site to the SCP if the complaint involves historic contamination, imminent threat to human health or the environment or if a removal action may be warranted. SCP will investigate the site and evaluate the need for further work.

6.4.2 **Site Prioritization** (327 IAC 7.1)

The State Cleanup Section uses the Priority Ranking System (PRS) rule (329 IAC 7.1) to prioritize sites contaminated with hazardous substances and petroleum that are excluded from the National Priorities List (NPL) for state response actions. The PRS is IDEM's management tool to address sites that pose a significant threat to human health and the environment, and to assure IDEM's resources are allocated accordingly. IDEM assigns a priority status of low, medium or high (*depending on site characteristics*) to hazardous substances and petroleum response sites evaluated utilizing the PRS. Priority ranking may change based upon additional site information or other relevant factors that become known to the SCP after site referral or release, or during site investigation.

The specific criteria used to determine site priority may be found in the PRS rule (327 IAC 7.1).

6.4.3 Site Assignment and State Cleanup Project Oversight

SCP strives to ensure that its resources are utilized to manage sites that present the most significant risk to human health and the environment. To achieve this, SCP will only assign a project manager to sites designated by the SCP as high priority or medium priority sites contaminated with hazardous substances or a combination of hazardous substances and petroleum. Medium priority sites contaminated only with petroleum will not be assigned to an SCP project manager and RPs are expected to complete site investigation and cleanup with limited to no direct SCP oversight. RPs with medium priority sites contaminated with only petroleum may receive a letter from IDEM requesting that they proceed with their cleanup action under the Independent Closure Process (ICP) (*see section 6.7.2*). If an RP does not receive a request to proceed through the ICP or cannot remediate to the ICP cleanup objectives then the RP may apply to the IDEM VRP to receive direct IDEM oversight and obtain a timely closure review and approval. RPs for SCP-designated low priority sites will receive a letter requesting that they proceed with cleanup through the ICP or apply to the VRP. RPs who remain in SCP are required to perform the necessary site characterization and remediation activities regardless of the extent of oversight provided by the SCP. If sites fail to progress and do not achieve a valid closure determination the SCP may remove the site from the ICP and may pursue legal actions if necessary to ensure the completion of these activities.

6.5 Emergency or Immediate Actions

The Immediate Removal Program (*a subprogram under the SCP*), conducts time critical removal actions when pollutants, contaminants, petroleum and certain solid waste materials are considered an imminent and substantial threat to public health and/or the environment. For Immediate Removal purposes, a "time critical" action is defined as an action that needs to be initiated within six months to prevent a release. The goal of the program is to separate the hazard from potential receptors. This program is intended to remove immediate dangers; not to perform a full scale remediation.

The Immediate Removal Program typically addresses sites with miscellaneous abandoned drums of hazardous substances, tire piles, and abandoned industrial and commercial facilities with various uncontrolled waste issues.

Actions conducted at these sites often include installation of fencing, sampling and disposing of drums, and source removal. Source removal could include disposal of contaminated soil, transformers, lab packs, contents of lagoons and other hazards. Time critical actions also commonly include supplying alternate drinking or filter systems for residential drinking water wells impacted by pollutants or contaminants and installing subslab depressurization systems on habitable structures with indoor vapor impacts exceeding chronic exposure levels.

The Immediate Removal Program utilizes the same laws and rules that govern the SCP and seeks to recover removal action costs when an RP can be identified.

If emergency actions are warranted, or if IDEM management determines that site conditions are extremely costly or complex and meet the U.S. EPA Superfund Removal Program criteria, SCP may refer the site to the U.S. EPA Region V Superfund Removal Program.

6.6 How Is the Public Involved or Notified?

Virtual File Cabinet and Administrative Records

IDEM uses the web based Virtual File Cabinet (VFC) (www.IN.gov/idem/6551.htm) to house all public documents. IDEM considers the public records contained on the VFC for a site to be the administrative record for cleanup projects and a public repository.

Community Relations Plans

Public participation and involvement is critical for a successful remediation. The SCP follows the guidance for community relations plans (CRP) presented in the NCP (*40 CFR Parts 300.430[c] through 300.43[c]*) (www.epa.gov/superfund/policy/index.htm). The SCP will conduct interviews with local governments and private parties believed to be directly affected by the cleanup project to determine if a CRP needs to be developed and implemented. If IDEM finds that community interest is significant during the interview phase, or if IDEM receives notifications of interest or requests for information, SCP may determine the CRP is necessary. If the SCP is overseeing a cleanup that is being led by the RP, the RP will develop and implement the CRP. If the SCP is leading the site cleanup then the SCP will develop and implement the CRP. The CRP elements may include:

- Establishment of a local information repository
- Publication of a notice of availability and brief analysis of the proposed remediation plan
- Providing a public comment period on the proposed plan
- Providing an opportunity for a public meeting
- Keeping a transcript of the public meeting
- Preparing a written summary of significant comments received during the public meeting, along with IDEM's responses

Use of an Environmental Restrictive Ordinance (ERO)

When a remedy will include the use of an Environmental Restrictive Ordinance (ERO), it is important to obtain feedback from the water utility and from the local government unit that has enacted or that has proposed adoption of the ERO. Consultants are encouraged to work directly with the local government unit. Because IDEM must rely on local governments to enforce EROs, municipal involvement throughout the review process will help IDEM evaluate the effectiveness of proposed EROs. Local governments should be contacted for information including:

- Current and future local water resource planning
- Procedures for granting exceptions and variances to the ERO
- Local point of contact for ERO monitoring and compliance
- Notification provisions for EROs

IDEM will notify local government units and water utilities in writing of any formal proposal to utilize an ERO at a particular site; and will request input on the items listed above if the information has not already been provided in the work plan.

6.7 Investigation

Investigation of the full nature and extent of potential and observed releases of contaminants is a required first step when completing response and remediation under SCP oversight. SCP investigations must delineate the nature and extent of contaminants to the land use appropriate screening levels contained in the *Remediation Closure Guide (Waste-0046-R1)* (www.IN.gov/idem/4694.htm) or a risk based screening level agreed upon by the SCP before the site investigation begins. Full nature and extent delineation also must include:

- Evaluation and sampling of all potential sources of the contaminants of potential concern
- Evaluation and sampling of all contaminant migration pathways
- Evaluation of fate and transport of contaminants
- Sampling of all potential contaminant receptors

These investigation elements are necessary to develop an accurate conceptual site model (CSM) and to justify any risk based remediation approach to closure. Historically collected environmental data and operational information also should be included in site investigation reports and taken into account when evaluating risk based exposures or developing a remediation strategy. Historically collected data should be reconfirmed during the site investigation process if the quality is in question. The *Remediation Closure Guide* provides a model for investigating and remediating SCP sites. The following specific steps and reports are required to document completion of an investigation under SCP oversight.

At a low priority site utilizing the ICP, the nature and extent of contamination in soil must be delineated to the residential soil screening levels for each contaminant of concern. At a medium priority site, utilizing the ICP, the nature and extent of contamination in soil must be delineated to the residential soil and ground water screening levels for each contaminant of concern.

6.7.1 High Priority Sites and Medium Priority Sites Contaminated with Hazardous Substances

As discussed in Section 6.4, high and medium priority sites are those sites contaminated with hazardous substances and petroleum that have ground water impacts and potential or confirmed receptor impacts. High and medium priority sites will generally follow the process outlined in Figure 6.2. The site characterization stage will include the following steps.

Initial Site Investigation (ISI) Report

SCP considers the ISI report as a combination Phase I Environmental Site Assessment (ESA) and Phase II Site Investigation. The ISI Report should include details of historic operational history and timelines, waste usage and waste management practices and details about potential release locations or source areas. The scope of work for the ISI should include data collection sufficient to screen potential contaminant source areas and potential migration pathways and to develop the initial CSM. The ISI Report should include information sufficient to show the extent of the environmental problem

Further Site Investigation (FSI) Report(s)

SCP will require one or more phased FSIs if the ISI did not fully delineate the nature and extent of contamination and fully evaluate migration pathways and receptor risks. For each successive

FSI, it is most efficient for the RP to submit an FSI work plan for IDEM review that establishes the scope, goals and procedures for the FSI. That will allow for agreement between IDEM and the RP for the project before the investigation is implemented, and eliminate unnecessary expenditure of time and money.

6.7.2 Medium Priority Petroleum Sites and Low Priority Sites (Independent Closure Process)

IDEM will issue a specific letter requiring that site investigation and remediation be completed using the Independent Closure Process (ICP) (www.IN.gov/idem/6548.htm) for low priority sites. The RP is to complete site investigation under the ICP in a manner consistent with high and medium priority sites. The RP must generate and submit the same investigation documents to report the results of the investigation of nature and extent of contaminants. The SCP considers low priority sites and medium priority sites contaminated only with petroleum to be sites with lower risk potential. Because of the lower risk potential, these sites may progress through each step of the process at a pace established by the RP, but within an overall project timeline established by the SCP. The SCP is responsible for ensuring that ICP sites progress to closure. Therefore, the SCP requires that the site investigation and remediation of a low priority site be completed within one year from the time the RP receives the letter from IDEM requiring completion of site investigation and remediation. For a medium priority site contaminated only with petroleum, the RP must complete investigation within one year of notification and remediation within three years of notification.

The PRS (*in 329 IAC 7.1-4-1*) defines low priority sites as sites with contamination found only in soil. Therefore, the RP must investigate ground water to verify to the SCP that ground water has not been impacted by the release of the contaminants. Ground water investigation for petroleum-only contamination must include a minimum of three grab samples of ground water from soil borings located within the source area or within 100 feet directly down gradient from the source area. Ground water investigation for hazardous substance contamination must include a minimum of three permanent two-inch monitoring wells located within the source area or within 100 feet directly down gradient from the source area. If the minimum and scientifically sound ground water sampling is not performed on a low priority site, the RP will not be allowed to continue using the ICP for that site.

6.8 Remedy Decision

6.8.1 Remediation Work Plan (RWP)

The RP will be required to submit a Remediation Work Plan (RWP) for IDEM's review and approval when SCP has approved the completion of the site investigation.

IDEM encourages RPs to include:

- Detailed summary and documentation of the results of the site investigation
- A statement of work to accomplish the remediation in accordance with agency guidelines
- Detailed summary of the results of any pilot study conducted
- A quality assurance project plan for construction
- An operation, maintenance and monitoring plan
- A health and safety plan
- A community relations plan (if warranted)

- A proposed schedule to implement the work plan

The proposed RWP should identify the nature and extent of the releases being addressed in the project, evaluate all potential exposure pathways, and explain how the RP intends to achieve the remediation objectives. IDEM recommends that information about the site be presented through a CSM as discussed in the *Remediation Closure Guide (Waste-0046-R1)* (www.IN.gov/idem/4694.htm).

6.8.2 Record of Remedy Selection (RRS)

The RP should complete and submit a Record of Remedy Selection (RRS) - State Form 54471 (www.IN.gov/idem/5157.htm) as a cover letter to the RWP. The RRS is intended to provide an executive summary for the project at the time the RWP is submitted. The completed RRS should summarize the data collected for all media and the justification for the selected remediation approach. The RRS may allow expedited review of the RWP if it is an accurate summary of all previous site work. Submittal of an incomplete RRS will delay the RWP approval process or be cause for disapproval of an RWP.

6.9 Remedial Action

6.9.1 Remediation Implementation Report

In instances where the RWP includes implementation of an engineered remedy that requires long term operation and maintenance, SCP will require submittal of an implementation report to verify that construction occurred in a manner consistent with the approved RWP and that implementation included quality assurance procedures and meets quality control specifications.

6.9.2 Remediation Completion Report

IDEM must determine if an approved RWP has been successfully implemented. IDEM will base this determination on review of a remediation completion report submitted by the RP. The RP may use the Remediation Completion Report Completeness Checklist on the VRP website (www.IN.gov/idem/4127.htm) to develop a comprehensive completion report.

The completion report may be submitted as a stand-alone document after an approved remedy is implemented and remediation objectives are met. The completion report should reflect the project as approved in the RWP, and demonstrate how the remediation objectives were met and how risks to human health and the environment were mitigated.

6.9.3 Remediation Progress Report or Ground Water Monitoring Report

Progress reporting is necessary for SCP to verify that long term remediation implementation is continually meeting the objectives of the approved RWP. During a long term remediation implementation or long term ground water monitoring, reports are submitted on a quarterly sampling schedule. Remediation progress reports submitted for an active engineered treatment should detail operational history of the system, maintenance activities required, total treatment or recovery volumes and contaminant disposal records.

6.9.4 Remedial Action Under Independent Closure Process

Remediation objectives for the ICP are expected to be based upon land use appropriate screening concentrations for each contaminant of concern. Residential screening levels for each

contaminant of concern can be found in the *Remediation Closure Guide* (RCG) (*Waste-0046-R1*) (www.IN.gov/idem/4694.htm) and must be used as the remediation goal when the site is residential or may include residential use in the future. Industrial or commercial use sites must achieve industrial use remediation goals and record an appropriate ERC on the deed in order to qualify for closure. Because the RCG will not include industrial screening levels for the ground water ingestion pathway, the ICP closure goal for industrial or commercial use sites will be determined by using a safety multiplication factor of 10 times the contaminant specific residential screening level for the ground water ingestion pathway. Investigation of any groundwater pathway should be performed in accordance with the RCG. The SCP ICP Guidance (www.IN.gov/idem/6548.htm) contains specific examples of how to use the industrial multiplier to determine appropriate industrial closure goals for industrial use ICP sites.

For a low priority site, the RP must complete investigation (*of contaminant nature and extent*) and remediation within one year of notification by IDEM. For a medium priority site contaminated only with petroleum, the RP must complete remediation within three years of notification. If a site fails to progress through the ICP within the specified timelines the RP will not be allowed to continue using the ICP for that site.

An ERC or other institutional control is generally necessary for impacted properties if contaminants remain at concentrations exceeding the residential screening levels. Documentation that the institutional control is in place should be submitted with the closure documentation.

6.10 Closure

The RCG (*Waste-0046-R1*) (<http://www.in.gov/idem/4694.htm>) explains in detail appropriate technical procedures and approaches to achieve site closure. In general, the SCP will issue closure in the form of a No Further Action letter. Indiana law allows parties to select the type of remedy that best achieves remediation objectives. IDEM can modify an NFA decision if additional data or new information indicates that a site may become a risk to human health of the environment.

6.10.1 Record of Site Closure

The RP should complete and submit the Record of Site Closure (RSC) - State Form 54472 (www.IN.gov/idem/5157.htm) with the Remediation Completion Report. The RSC form should summarize the information in the completion report and the completion report checklist. If the RSC form is incomplete IDEM will request that the RP update and re-submit the form. An incomplete RSC may delay the closure approval. The RP should contact the SCP project manager to discuss specific information to be included in the RSC form to minimize delays.

6.10.2 Split Sampling for Confirmation

IDEM may split samples whenever necessary, at the discretion of the SCP project manager. Split samples can consist of any environmental media. The project manager will collect samples from the same locations and at the same time as the RP. The split samples will be analyzed using the same methods at different laboratories to determine if analytical results are comparable. Split sampling may be utilized at any time during the project, but may occur most frequently at the time of closure to verify closure data. IDEM will seek reimbursement of split sampling costs from the RP.

6.10.3 Environmental Restrictive Covenants (ERC) and Environmental Restrictive Ordinances (ERO)

If an institutional control (*such as an ERC or ERO*) (www.IN.gov/idem/5959.htm) is part of the remedy, the RP must provide proof in the completion report that the control is in place. A draft ERC must be submitted to SCP for approval of restriction language and verification of property ownership and legal description. A copy of the signed and recorded ERC should be included in the completion report. For an ERO, evidence that the ordinance has been passed by the local unit of government must be provided. A public hearing may be required prior to approval of the RWP.

ERCs must remain in effect until IDEM agrees that they may be removed. Restrictions provided by an ERC may only be modified with agreement of IDEM.

6.10.4 No Further Action Letter

SCP will issue a No Further Action (NFA) letter to approve closure of a high or medium priority remediation project (*which has an assigned project manager*). SCP will only issue the NFA letter upon successful completion of site investigation, implementation of the RWP, and implementation and monitoring of any necessary institutional controls. An NFA determination will remain in effect if conditions are unchanged and if no new or incorrect information is found that may alter the CSM. Institutional or engineering controls must be maintained and in continual effect for an NFA determination to remain valid.

6.10.5 ICP Closure Completion

Sites proceeding under the ICP will qualify for a closure determination from IDEM when they have verified and certified achievement of remediation to the land use specific screening levels and have implemented any necessary institutional controls such as ERCs. As with all other SCP projects, final executed ERCs must be presented with documentation of property ownership and legal description. Final ERCs must contain filing stamps from the particular County Recorder's office and also must be notarized.

Upon completion of all necessary remediation steps, the RP must submit all documentation to detail all steps taken to achieve closure. The ICP Closure Form – State Form 54166 (www.IN.gov/idem/5157.htm) will accompany all standard documentation. The ICP Closure Form acts as an executive summary to detail results of site investigation and remedial action. The RP and the RP's consultant must sign the ICP Closure Form to certify to IDEM that the data is accurate and the site meets all remediation objectives.

SCP will conduct a cursory review of the ICP documentation to verify the information and the ICP Closure Form are complete. The RP will be notified within 90 days of the results of the cursory review. If documentation is accurate and complete the SCP will issue an ICP Closure Completion letter.

Documents submitted for the ICP should be sent by mail to the SCP or to the SCP email address at scp@idem.in.gov.

6.11 Conditions Subsequent

The approved Remediation Work Plan or Long Term Maintenance or Monitoring Plan must address any contamination that may remain subsequent to remediation and closure. The SCP may grant a conditional closure. In that case, SCP will issue a No Further Action (NFA) letter with conditions subsequent to closure that must be monitored or maintained to ensure the continued effectiveness of the remedy. The NFA letter will identify the conditions. An environmental restrictive covenant (ERC) may also detail any condition that requires monitoring or maintenance. SCP will not agree to closure where conditions pose a potential or ongoing threat to human health or the environment.

6.12 When Issues Arise

Issue resolution can be informal or formal in the SCP. Most disagreements regarding the technical aspects of a project can be resolved through discussions with the project manager and the other parties. The SCP requests that the RP or consultant first discuss project specific disagreements with the project manager. If it is not possible to resolve issues between the technical staff, the RP or consultant may ask the SCP Section Chief to intervene. An issue may be raised through the IDEM chain of command for resolution. Formal dispute resolution procedures may be necessary.

When RPs do not agree to perform the cleanup upon formal request by IDEM, IDEM may issue an administrative order (*Commissioner's Order*) or seek a judicial order to compel a response and remediation. If RPs do not comply with the judicial order IDEM may request a court order for punitive damages of up to three times the total costs incurred by IDEM as a result of the RP's failure to properly provide removal or remedial action upon order of the court. RPs have the right to appeal during these stages.

6.13 Forms and Checklists

Sample copies of many forms, templates and checklists discussed in this RPG may be found at the end of each Chapter of this guide. **The sample forms, templates and checklists in this guide are images only, may not be current, and cannot be completed electronically.**

Current State Forms that can be completed electronically are posted on the IDEM Forms website (www.IN.gov/idem/5157.htm) as PDF fillable forms, Microsoft Word documents or Excel documents. Links to those forms and checklists as well as many other documents and websites have been provided where the document is discussed in the text.

- Sample 6.1 State Cleanup Program Independent Closure Process Site Closure - State Form 54166

These forms appear in Chapter 1:

- Sample 1.1 Record of Remedy Selection - State Form 54471
- Sample 1.2 Record of Site Closure - State Form 54472

Sample 6.1 State Cleanup Program Independent Closure Process Site Closure



**STATE CLEANUP PROGRAM
INDEPENDENT CLOSURE PROCESS
SITE CLOSURE**
State Form 54166 (11-09)

Indiana Department of Environmental Management
Office of Land Quality
100 North Senate Avenue
Mail Code 66-30, Room 1101
Indianapolis, IN 46204-2251
Telephone: (317) 234-4165
Fax: (317) 234-0428
E-mail: scp@idem.IN.gov

INSTRUCTIONS: The form must be completed in its entirety and submitted to IDEM upon request for independent closure process (ICP) site closure. This form is to be completed by **both** the environmental consultant and the responsible party. Questions regarding this form may be directed to the contact information above. ICP and your IDEM site number should be referenced in the subject line (if via email) to ensure a timely response.

I. SITE INFORMATION			
Site name (as reported to IDEM)			
Site location (number and street)			
Site location (city/State/ZIP code)			
IDEM site number			
II. RESPONSIBLE PARTY INFORMATION			
Responsible party name (company name and contact person)			
Responsible party address (number and street)			
Responsible party address (city/State/ZIP code)			
Telephone number			
E-mail			
III. ENVIRONMENTAL CONSULTANT INFORMATION			
Contact or consultant name (company name and contact person)			
Contact or consultant address (number and street)			
Contact or consultant address (city/State/ZIP code)			
Telephone number			
E-mail			
IV. ENVIRONMENTAL DATA			
Contaminant(s) check all that apply			
<input type="checkbox"/> Gasoline	<input type="checkbox"/> Diesel	<input type="checkbox"/> Oil	<input type="checkbox"/> Other (specify)
Estimated volume of release (gallons)			
Contaminant found in (check all that apply)			
<input type="checkbox"/> Soil	<input type="checkbox"/> Ground water	<input type="checkbox"/> Indoor air	<input type="checkbox"/> Other (specify)
Depth to ground water (feet)			
Ground water flow direction			
Determined by <input type="checkbox"/> Temp. ground water points <input type="checkbox"/> Perm. monitoring well <input type="checkbox"/> Topography <input type="checkbox"/> Other (specify)			
Potential receptors	Distance to (feet)	Investigated (check as appropriate)	Impacted (check as appropriate)
1. Water wells	1.	1. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2. Ground water	2.	2. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3. Surface water	3.	3. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4. Basements	4.	4. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5. Utility corridors	5.	5. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6. Other (specify)	6.	6. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	6. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Current land use <input type="checkbox"/> Residential <input type="checkbox"/> Commercial/industrial <input type="checkbox"/> Recreational <input type="checkbox"/> Other (specify)			
V. REMEDIATION SUMMARY			
Soil			
1. Ex-situ soil remediation	<input type="checkbox"/> Excavation <input type="checkbox"/> Other (specify)	Quantity removed (cubic yards)	<input type="checkbox"/> N/A
2. In-situ soil remediation	<input type="checkbox"/> Chemical injection (specify) <input type="checkbox"/> Other (specify)		<input type="checkbox"/> N/A
3. Soil source removed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Ground water			
1. Ex-situ ground water remediation	<input type="checkbox"/> Pump and treat <input type="checkbox"/> Other	Volume removed (gallons)	<input type="checkbox"/> N/A
2. In-situ ground water remediation	<input type="checkbox"/> Chemical injection (specify) <input type="checkbox"/> Bioaugmentation (specify)	<input type="checkbox"/> Air sparge/soil vapor extraction <input type="checkbox"/> Other (specify)	<input type="checkbox"/> N/A
3. Ground water source removed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

8. Has the recorded ERC been submitted to IDEM? Yes No N/A

9. Which restrictions are addressed in the ERC (if applicable)?

- Residential land use
- Well installation/drinking water consumption
- Excavation
- Other (specify)

10. As a record of communication, provide the following information for all documents (investigation, remediation, etc.) pertaining to the site.

Document title	Document date (month, day, year)	Environmental consulting company/preparer	IDEM's virtual file cabinet (VFC) document number

RESPONSIBLE PARTY CERTIFICATION

I certify that to the best of my knowledge the information presented and attached to this form is true and accurate. This recommendation is based on the available information at the time of the investigation. I have understood and acknowledged IDEM's requirements, received a copy of the Remedial Action Plan (RAP) letter, and am submitting the required documentation on behalf of the Responsible Party.

Signature

Date (month, day, year)

Printed name _____
Title _____
Company name _____

Notary

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared (representative name) _____, the (relationship to responsible party, if different) _____ of the owner, (property owner name) _____, who acknowledged the execution of the foregoing instrument for and on behalf of said entity.

Witness my hand and Notarial Seal this _____ day of _____, 20____.

_____, Notary Public

Residing in _____ County, (State) _____

Date my commission expires: _____ (month, day, year)

VIII. ENVIRONMENTAL CONSULTANT CERTIFICATION STATEMENT

INSTRUCTIONS: For this site closure form to be valid, both the primary project manager and the principal owner* at the consulting company must sign and date. The primary project manager must be certified as a Licensed Professional Geologist (LPG), Professional Engineer (PE), or Certified Hazardous Materials Manager (CHMM).

I certify that, to the best of my knowledge, the information presented on and attached to this form is true and accurate. This recommendation for closure is based on all available data as of _____ (month, day, year). I have understood and followed IDEM's requirements for receiving a Completion of Independent Closure Process letter, and am submitting the required documentation on behalf of _____ (Responsible party).

 Primary project manager signature _____ Date (month, day, year) _____

Printed name _____ Professional license number _____

Title _____

Company name _____

 Primary project manager signature _____ Date (month, day, year) _____

I certify that, to the best of my knowledge, the information presented on and attached to this form is true and accurate. This recommendation for closure is based on all available data as of _____ (month, day, year). I have understood and followed IDEM's requirements for receiving a Completion of Independent Closure Process letter, and am submitting the required documentation on behalf of _____ (Responsible party).

 Principal owner* signature _____ Date (month, day, year) _____

Printed name _____

Title _____

Company name _____

*Principal owner means the owner, president, vice president, operations manager, etc. who is authorized to make decisions that represent the company.

