

FACT SHEET

Brownfields Cleanup Program (BCP)

REMEDIAL WORK PLANS

(see also ECL §§27-1411, 1413, 1415)

After completion of a remedial investigation showing the need for site remediation, a remedial work plan can be developed. The remedial work plan must include an Alternatives Analysis. For large/complex projects, remedial work plans can be given conceptual approval by the Department before detailed plans and specifications are developed.

Typical Remedial Work Plan Contents

- Introduction and Purpose
- Summary of Site Contamination
- Remedial Action Objectives
- Alternatives Analysis
- Plans and Specifications (can be submitted separately for large/complex projects.)
- Institutional/Engineering Controls (IC/ECs) and Annual Certifications
- Health and Safety Plans
- Quality Assurance/Control Plan
- Schedule
- Reporting
- Project Organization

Features of Alternatives Analysis

- An unrestricted remedy is always evaluated (see also fact sheet titled, "Cleanup Tracks and Tables").
- If a remedy is proposed that relies upon IC/ECs, the Department can require the evaluation of additional alternatives in some cases. The viability and reliability of any IC/ECs must be evaluated (see also fact sheet titled, "Institutional and Engineering Controls").
- An alternatives analysis contains fewer steps than a feasibility study. The main features of an alternatives analysis include:
 - Description of Alternative(s) and Identification of Proposed Remedy
 - Detailed Analysis: under each of nine remedy selection factors (overall protectiveness, conformance to standards, criteria, and guidance, short-term effectiveness/impacts, etc.), each alternative is evaluated against the factor and compared to any other alternative(s) under consideration. The removal/control of source areas and the stabilization of groundwater plumes must be evaluated.
 - Summary of Proposed Remedy: the alternatives analysis concludes with a summary of the main factors that led to the selection of the proposed remedy and a listing of the elements of the remedy.

Remedial work plans are subject to 45-day public comment periods and in some cases, public meetings.