

**Site Management Plan (SMP) Checklist
for BCP ERP SSF and VCP Sites**

Site Name:

Location:

Site No:

Project Manager:

The SMP for a site remedial program must include at a minimum an Institutional and Engineering Control Plan as well as provision for the periodic certification of the institutional control and engineering controls (IC/EC certification) and may include, as required by the remedy, a Site Monitoring Plan and Operation & Maintenance Plan. Each of these individual areas of reporting must the minimum requirements detailed below.

The SMP being reviewed addresses:

- The entire site
- An operable unit of the site identified as: _____
- An IRM for operable unit _____ identified as: _____
- A groundwater use restriction or short term engineering control for an otherwise unrestricted use site

The SMP period for this site, after an initial 15 month review, will be:

- Annually** **Every 3 years** **Every 5 years** **Every 10 years**

Institutional and Engineering Control Plan:

- Must include a complete description of all institutional and/or engineering controls employed at the site, including the mechanisms that will be used to continually implement, maintain, monitor, and enforce such controls both by the applicant, the applicant's successors and assigns, and by state or local government.
- Appropriate plans for implementation of the engineering and institutional controls, such as for handling soils removed from beneath a soil cover or cap during maintenance or redevelopment of the site. This includes media-specific implementation plans, such as plans for:
 - Soil management which detail procedures for handling soil excavated from below a soil cover or cap during maintenance or redevelopment of the site (e.g., a soils management plan);
 - Installation/operation of sub-slab vapor depressurization systems, or other types of systems to address vapor intrusion;

- Engineering control inspection plans for the remedy as implemented or to be installed as part of the site development, such as for a cap or cover system.
- A periodic review report which includes the IC/EC certification as well as all other reporting of the IC/ECs, site monitoring and/or operation and maintenance of the remedy.

Institutional Control and Engineering Control (IC/EC) Certification:

The applicant or site owner must make a periodic certification of the IC/EC to the Department. The requirements of this periodic IC/EC certification will be described in the SMP and the certification must be included in the periodic review report, which is prepared and submitted for the Department-approved certification period. The IC/EC certification will clearly identify the periodic review period and certify that:

- The institutional controls and/or engineering controls employed at such site are:
 - unchanged from the date the control was put in place, unless otherwise approved by the Department;
 - in place and effective;
 - performing as designed;
 - nothing has occurred that would impair the ability of the controls to protect the public health and environment; and
 - nothing has occurred that constitutes a violation or failure to comply with any operation and maintenance plan for such controls.
- Use of the site complies with the environmental easement;
- Access to the site will be provided to the Department to evaluate the remedy and verify continued maintenance of such controls.
- If a financial assurance mechanism is required, the mechanism remains valid and sufficient for the intended purpose.

If the remedy requires only institutional controls, the certification may be made by the property owner. If the remedy includes engineering controls, the certification must be made by a qualified environmental professional or, if engineering evaluations are required, a licensed professional engineer.

- For BCP sites: For those sites determined to be non-significant threat sites, but where contaminants in groundwater contravene drinking water standards at the site border, in addition to the items noted above; the remedial party will also have to certify:
 - That no new information has come to the site owner's attention, including groundwater monitoring data from wells located at the site boundary, to indicate that the assumptions made in the qualitative exposure assessment of off-site contamination are no longer valid; and
 - Every five years, that the assumptions made in the qualitative exposure assessment remain valid.

Site Monitoring Plan:

- No Site Monitoring Plan is required for the remedy controlled by this SMP

Or, the SMP includes, as appropriate for the site remedy, a sampling and analysis plan for monitoring groundwater, soil vapor, or another media as identified by the decision document for the site, designed to:

- Assess the remedy’s compliance with groundwater standards.
- Assess the remedy’s compliance with the cleanup objectives of any other impacted media.
- Evaluate site information periodically to confirm that the remedy continues to be effective for the protection of public health and the environment.
- Prepare the necessary reports of the results of this monitoring for a period determined by the Department.

Operation & Maintenance Plan:

- No O&M Plan is required for the remedy controlled by this SMP

Or, the SMP includes, as appropriate for the site remedy, an O&M plan with provision to:

- Identify the operation and maintenance activities necessary for the continued operation of the components of the remedy, including provision for evaluation of the systems and recommendations to optimize performance.
- Evaluate site information periodically to confirm that the remedy continues to be effective for the protection of public health and the environment.
- Prepare the necessary reports of the results of this evaluation for a period determined by the Department.

***** For DEC Internal Use Only:

UIS Updates

Remedial Site Information page

- Verify/Update Remedial Site Information** - Project update guidance for sites descriptions and environmental assessments may be found at the following internal web address: <https://nysemail.sharepoint.com/sites/DECInSite-DER/SitePages/UIS-Site-Desc-EA.aspx>
 - Site Description**
 - Site Environmental Assessment**
 - Site Health Assessment:** request from DOH by the DER PM, entered by SCS
 - Site Name, Address, & Size:** verify and notify SCS to make adjustments

- View Contacts:** verify that all affiliation information is accurate, up-to-date, and complete
- Agreement/Order Ref. No.** (Cross Refs page link from main site page): enter corresponding identifying reference number.
- Significant threat** (on main page): verify status, contact SCS to make adjustments
- Allowable Use** (on main site page): verify most restrictive use allowed via drop down, entered by the SCS

For BCP sites only:

- BCP Clean Up Track** (on main site page for BCP sites): enter track via drop down, selection available in remedial projects only
- Percent En-zone** (via Extra Details link on main site page) verify and/or select via drop down
- BCP Off-Site Status** (enter in the Extra Details link on main site page) select via drop down (for sites with off-site issues)
- Projects** (confirm status (ACT/PLN) for all projects, especially:
 - Remedial Investigation/Design (ACT/ACT)
 - Interim Site Management (ACT/ACT)
 - Remedial Action (ACT/PLN)
 - Certificate of Completion (PLN/PLN)
 - Site Management (PLN/PLN)
 - Periodic Review (PLN/PLN)

IC/EC Module

- Site Property Information Summary Page**
 - Verify that property information is complete and accurate for all parcels
 - Verify that “owner information” is complete and accurate for all parcels
 - Verify that “contact information” is complete and accurate
- Control Details Page**

Add Control information as follows:

- Options for Controls are listed below in hierarchical order - select the highest level that exists for the site:
 - Environmental Easement
 - Deed Restriction
 - Environmental Notice
 - Decision Document
 - Other Controls
- ICs - indicate all types used for the site
- ECs - indicate all types used for the site

- Control Description - provide a bulleted summary of controls from the SMP.
Example control description text:
 - Prohibition against well installation (or use of gw without treatment)
 - Soil cover over 5 acres
 - Compliance with a soils management plan
 - Annual monitoring of groundwater
 - Use must be maintained as commercial
 - Groundwater extraction and treatment system
 - Point of entry water supplies on 3 houses

The controls (check boxes) and description are part of the certification, therefore be concise and accurate.

Documents required in DEC Docs

- Agreement/Order/SAC, ROD, SMP (upon approval), and any other appropriate and pertinent documents pertaining to verifying IC/ECs

Vapor Mitigation System Documentation

- Mitigation System Installation Record forms have been completed for all on-site and off-site vapor mitigation systems and emailed to Rakshak Iyengar, the project manager for the statewide SSDS inspection and maintenance program. In the transmittal email, indicate who has maintenance responsibility (State-funded consultant, RP consultant, BCP applicant consultant, etc.).

Completed by: _____ Date: _____
Project Manager

Reviewed by: _____ Date: _____
Section Chief/Regional HWR Engineer