

CVP/SRAG - SRP MEETING
MARCH 18, 2015
ACTION ITEM RESPONSES

1. **Issue:** The Department provided an update on the work of the Site Remediation Professional Licensing Board. An attendee asked if it is possible to have the Board insert a note in Data Miner to let a LSRP know that their renewal application has been received by the Board. LSRPs are not notified when the Site Remediation Professional Licensing Board receives their renewal application. Since it is a time-sensitive submittal, LSRPs would appreciate knowing if it was received or if there is a problem and they need to follow-up.

Response: The Department is looking into implementing an electronic response such that the LSRP will receive an email notification when the renewal application is received and entered into the Department database.

2. **Issue:** Does there need to be “wet signature” on the certification page of submitted documents or can the documents be signed and then copied/scanned and submitted electronically?

Response: During meeting discussions, the Department noted that a copy of a certification/signature page with appropriate signatures is acceptable. This would allow the signature page of a document to be scanned and sent electronically.

3. **Issue:** Who is the contact person for questions regarding sites with multiple case numbers?

Response: Questions regarding sites with multiple case numbers should be directed to the BCAIN Duty Officer at (609) 292-2943.

4. **Issue:** For Bureau of Case Management cases, is it necessary or beneficial to send draft reports to the Department prior to submitting a final report?

Response: The Department does not require or recommend submitting draft documents prior to submitting a final document. A more effective approach would be to schedule meetings with appropriate Department staff to discuss key issues and decisions that will be included in a final report. This would allow problems regarding remedial decisions or supporting documentation to be identified and resolved prior to submitting the final document is.

5. **Issue:** Laboratory Certification requirements for “Analyze Immediately” parameters seem too stringent when these parameters are monitoring during low-flow sampling to determine when a sample can be taken. Can these requirements be modified?

Response: The Department provided information on the regulatory certification requirements for “analyze immediately” parameters. Several stakeholders pointed out that these parameters are often monitored during low flow ground water sampling to determine when the well can be sampled. In this case, some stakeholders felt that the laboratory certification requirements were too stringent. However, other stakeholders also agreed that for cases where the data would be used for decision making purposes (e.g., monitored natural attenuation), the laboratory certification requirements may be appropriate. The SRP takes the position that analytical results of ground water samples collected by low flow purging are used for decision making purposes, and that stabilization of ground water conditions is a key component in the collection of a representative ground water sample. As such, analysis of parameters to demonstrate stabilization of ground water conditions warrants that such analyses are performed by a certified laboratory/individual. While SRP managers and staff understand the concerns raised by several stakeholders, it was noted that the laboratory certification requirements are included in regulations issued by the Department’s Office of Quality Assurance. Attendees are encouraged to contact the Office of Quality Assurance to initiate discussions on how the regulations may be modified to allow for measuring of field parameters during sampling without having to meet laboratory certification requirements.