

Helpful Hints for LSRP Submittals
From Bureau of Inspection and Review

Delineate all media in all directions, vertically and horizontally

RAOs:

1. The Scope of Remediation should include the size and content of all underground storage tanks.
2. When using the notice “Soil Contamination from an Off-Site Source Not Remediated – Diffuse Anthropogenic Pollution” consider:
 - a. Atmospheric deposition should be identified in a uniform concentration across the site - DAP is not a “hotspot” area of concern.
 - b. Typically, DAP is in the top 6” of soil and not at depths below 6”.
3. Entire Site RAOs can be issued when a Preliminary Assessment has been conducted and no open AOCs and incidents numbers remain.
4. An RAO should be submitted as a stand-alone document. Do not embed an RAO with an online phase document submission (PA, PA/SI, SI, RIR, RAR).
5. The notice “Known On-site Contamination Source Not Remediated - Historic Fill (Area of Concern RAO)” cannot be used for ISRA Leaseholds.

General:

1. The use of the phrase “professional judgement” should be followed by a detailed description of the multiple lines of evidence used to justify the determination. It is not a stand-alone phrase.
2. A variance to the Tech Regs must include sufficient documentation of an LSRP’s professional judgment.
3. It is not a requirement to include electronic copies of old phase document forms with an online phase document submission.
4. If a Preliminary Assessment has been conducted, an “Entire Site” online phase document submission can be completed for an entire site submission.
5. Ensure that the attachments uploaded with online submissions are correct and not blank.

6. Background investigations and off-site source investigations must include supporting data.
7. The closure of State and Federally regulated USTs requires a Site Investigation Report.
8. A Remediation in Progress Waiver Application must address all media and all discharges during the operations timeframe.
9. To determine the correct billing category, it is necessary to establish the correct number of AOCs and CAOCs on a correctly formatted CID, without consolidation.
10. Submit the required information for the Department to establish the CEA at the RI, prior to issuance of the RAP and RAO.
11. A Receptor Evaluation is **always** required unless an unrestricted use remediation is complete, and a final remediation document is issued within one year after the earliest applicable requirement to remediate.
12. If a RAW approval was granted prior to December 2008, provide the Department's RAW approval letter to support information in the CID.
13. Include all prior NFA letters as supporting documentation for an RAO.

Site Specific Standards/Attainment and Compliance

1. There is no requirement to include details of the development of site-specific soil standards/screening levels or soil compliance options that were considered but never utilized in the final evaluation of an AOC or the site. This confuses the inspector or reviewer.
2. If an alternate or new remediation standard/soil screening level is developed, include the "Alternate or New Remediation Standard and/or Screening Level Application Form", "Remediation Standard Notification" and any supporting documents (i.e., calculation spreadsheets, data, etc.).