

No Further Action (NFA) vs. No Further Investigation (NFI)

Comment letters with “NFA or NFI for AOCs” ≠ NFA Letter

NFA Letter with Covenant not to Sue =
Final Remediation Document

Clarification ListServ posted August 19, 2019



No Further Action (NFA) vs. No Further Investigation (NFI)

The LSRP may rely on this formal "No Further Action Letter," provided in his or her professional judgment the remediation for which the "No Further Action Letter" was issued is still protective of the public health and safety and of the environment.



Order of Magnitude Evaluation Applicability

When is it required?

- Approved/certified Remedial Action Workplan (RAW)
- Final Remediation Document (FRD)
 - No Further Action (NFA)
 - Response Action Outcome (RAO)



Order of Magnitude Applicable Standards

Order of Magnitude Applies to

- Direct Contact Soil Remediation Standards
- Ground Water Remediation Standards
- Surface Water Remediation Standards

Order of Magnitude Does Not Apply to

- Generic IGW Soil Screening Levels
- TPH/EPH criteria
- Indoor Air Screening Levels



Order of Magnitude Evaluation Remedial Action Workplan (RAW)

If the standards submitted in the RAW have changed by an order of magnitude or more and a FRD has not been issued, the new standards must be used.



Order of Magnitude Evaluation Final Remediation Document

If contaminant concentrations remaining in the area of concern, for which a FRD has been issued, exceed the current standard by an order of magnitude or more, further evaluation and/or remediation may be warranted.

