



RELEASE CLOSURE DOCUMENTATION Q&A

Bureau of Water Protection and Land Reuse

Questions

Does the Department have a definition for “remediation commenced within 2 hours of the release’s occurrence” and how will the Department measure and enforce that requirement for PEP Certifications?

Will the Department consider revising the concept/language to “remediation commenced within 2 hours of the discovery of the release”?

Questions

Will the use of RCPs and DQA/DUE evaluations be required for closure reports where analytical data are collected, including Certifications by PEPs?

Are releases to surface water available for PEP certification?

The Conceptual Site Model is a key component of current LEP verifications. Will demonstration of a final Conceptual Model be required in a Release Remediation Closure Report under the RBP?



AUDITS OF RELEASE RECORDS Q&A

Bureau of Water Protection and Land Reuse

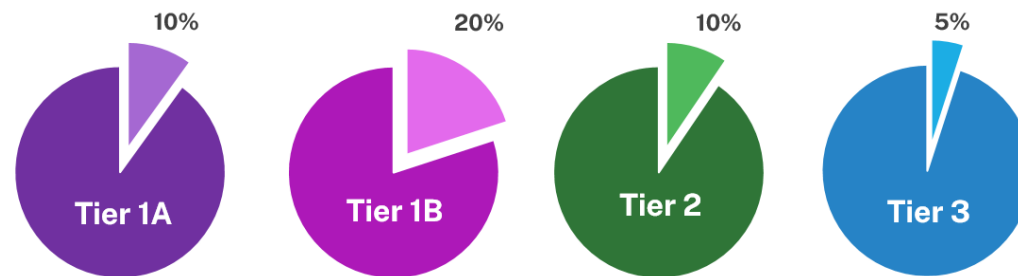
AUDITS OF RELEASE RECORDS

Question

Will releases closed prior to tier assignment be subject to audit, and is there a percentage goal for such audits?

Additional Context

- Goals were provided for auditing a percentage of releases based on the tier they were initially assigned.
- IA reports and some closure reports will be filed prior to tier assignment.



AUDITS OF RELEASE RECORDS

Question

Can the audit time frames be shortened for single release situations?

Additional Context

- The time frames for audits are lengthy considering that they will be for single releases not whole sites.

Audit Type	Timeline
Screening	Complete: 180 days
Focused	Initiate: 180 days Complete: 18 months
Full	Initiate: 180 days** Complete: 2 years

***Unless continued from a focused audit*

AUDITS OF RELEASE RECORDS

Question

Can the Department define a “substantial threat to public health or the environment?”

Additional Context

- Related to the slide for situations in which a verification or certification can be reopened after the audit timeframe has passed.



FEES Q&A

Bureau of Water Protection and Land Reuse

Question

Will fees only apply to releases that happen after the regs are instituted or will they also apply to sites currently in the voluntary program?

Will fees directly support the program or be swept into the general fund?

Will DEEP be considering some kind of "maximum" amount for fees for any given release or site under the new Release-Based Regulations.

Question

For comparison, what does the DEEP collect annually for Property Transfer Law and 22x-133x entry fees?

Is the fee structure being developed to be comparable to the prior fees under the Property Transfer Law and 22x-133x entry fees? If not, what is the rationale for increasing or decreasing the overall anticipated receipt of fees by DEEP?

Are fees release specific or site specific? i.e., if more than one release is present at a site and they are discovered at different times, do you have to pay separate fees for each release?

Question

How do the annual fees on slide 9 (until remedial action approved) differ from those on slide 10?

Will the draft regulations include the specific fee amounts

Question

Would it be possible to exempt single family residences from paying fees like non-profits and State agencies?

Please consider adding political subdivisions under the provisions for no fees. RWA is a not-for-profit water utility and does not meet the definition of a municipality or a non-profit. Any fees would be paid for by rate payer money.

A stylized landscape illustration. The top right corner features a bright yellow sun. Below it is a large green hill with a dark blue outline. The bottom of the image shows a light blue area representing water, also with a dark blue outline. The text "THANK YOU!" is centered on the green hill.

THANK YOU!