

Options for Improving Site Investigations

Problem Statement: The Department continues to receive a number of site investigation reports (SIR's) that don't always define the degree and extent of contamination, evaluate all of the pathways of concern and/or identify all potential receptors. This is of particular concern at sites with chlorinated contamination. Because WDNR review of the site investigation report is generally not requested, these issues are sometimes not identified until a closure request is submitted. This can result in the need to complete additional investigations or other work before closure can be granted. By that point, it is often more difficult and expensive to get the necessary information and the delays can have detrimental effects, especially on those sites where a redevelopment action is pending.

As part of the NR 700 rule revision process, the Department is hoping to improve the quality of SIR's such that the issues identified above are adequately addressed as early in the process as possible. We are interested in obtaining feedback from Focus Group members on whether you agree with our conclusion that the quality of some SIR's can be improved and if so, what potential approach would be best for addressing this concern. To help focus the discussions, we have identified 4 possible options that are briefly summarized below. If anyone has other ideas we would be happy to discuss those as well. Possible options include:

1. Continue to address issues associated with obtaining complete SIR's on a case-by-case basis. This option would rely on existing code language and result in no change to NR 716.
2. Include language in NR 716 requiring that a conceptual site model (CSM) be developed at the beginning of a site investigation to guide the SI and modified/refined as the investigation progresses. The final CSM would be documented in the SIR.
3. WDNR typically only performs a cursory evaluation of the information contained in an SIR and does not provide a formal response. Revise NR 716 so that a detailed DNR review and response of the SIR is a required step in the cleanup process. A fee would be charged for review of the site investigation report to off-set the additional workload for the Department.
4. Develop detailed guidance that provides the Department's expectations on the information to be provided in order to satisfy the provisions in s. NR 716.07. The guidance may also include a standard reporting format so that all of the necessary information is included.
5. Other approaches identified by Focus Group members.