

CVP-SRAG Meeting: September 14, 2016

Agenda Topic - “Deficient Remedial Investigation Reports and Direct “Oversight”

Statistics presented during the presentation:

- There were 30 reports submitted through the portal that identified the requirement of a Classification Exception Area (CEA) proposal, where the LSRP bypassed uploading the CEA proposal electronically, and have not submitted the CEA proposal.
 - The CEA proposal was due within 14 days of completing the remedial investigation report online submission.
- 42 reports submitted through the online remedial investigation report service self-reported that the remedial investigation report was not complete for all contaminated areas of concern associated with the case.
- For remedial investigation reports submitted for the May 7, 2016 remedial investigation deadline where the LSRP indicated the remedial investigation was incomplete, the trigger date to start to comply with direct oversight requirements (30/60/90 day submissions) was May 8, 2016.
- If a remedial investigation report submitted as complete is found to be incomplete, the date triggering compliance with direct oversight begins from the date that the LSRP withdrew the document or Department notification, whichever is earlier.
- A listserv regarding direct oversight requirements for those sites that did not meet the statutory May 7, 2016 extension deadline was sent on May 11, 2016. Subsequently, 89 responsible parties complied with direct oversight requirements.
 - Of these responsible parties, 29 missed the May 7, 2014 remedial investigation deadline and 60 missed the May 7, 2016 remedial investigation extension deadline.
- Approximately, 4,900 cases had a remedial investigation report due by May 7, 2014.
 - 3,750 responsible parties were required to submit remedial investigation reports by May 7, 2014
 - 2,500 responsible parties complied. (compliance rate of 67%)
 - 1,148 responsible parties qualified for a two-year extension to complete the remedial investigation by May 7, 2016.
 - 963 responsible parties complied. (compliance rate of 84%)
 - Of responsible parties that were required to submit remedial investigation reports by May 7, 2014 or May 7, 2016, 71% have complied.
- 12 of the last 14 enforcement actions have included provisions ordering compliance with direct oversight requirements.
- 26 cases have signed Administrative Consent Order and/or received Administrative Orders/Notice of Civil Administrative Penalty Assessment for direct oversight.