

New Jersey Department of Environmental Protection Site Remediation Program

GUIDANCE FOR THE PREPARATION OF THE CASE INVENTORY DOCUMENT

Purpose

The Case Inventory Document (CID) is a **concise summary** of all areas of concern (AOCs) and major case components that serve to form the basis for remedial decisions. The person responsible for conducting the remediation shall develop and submit the CID with each remedial phase report and Direct Oversight Documents. The tracking of AOCs and major case components allows for the person responsible for conducting the remediation and the Department of Environmental Protection (Department) to:

- 1. efficiently track the progress of all AOCs from identification to issuance of a final remediation document (i.e., Remedial Action Outcome (RAO), No Further Action letters (NFAs), etc.), in one easily identified section of the technical reports;
- 2. review a summary of the work completed and planned at each AOC; and
- 3. identify the current case status.

This tracking process allows for the snapshot review of remedial efforts.

II. Overview

The person responsible for conducting the remediation shall complete the CID for all cases and include the CID with all remedial phase reports and all direct oversight documents.

III. Definitions

An AOC is any existing or former location where hazardous substances, hazardous wastes, or pollutants are or were known or suspected to have been discharged, generated, manufactured, refined, transported, stored, handled, treated, disposed of, or where hazardous substances, hazardous wastes, or pollutants have or may have migrated. For a more specific definition of an AOC, please refer to the Technical Requirements for Site Remediation, 7:26E-1.8 Definitions.

In addition, the person responsible for conducting the remediation shall list in the CID spreadsheet the following major case components items, when applicable:

- 1. Classification Exception Areas;
- 2. Deed Notices;
- 3. Immediate Environmental Concerns (IEC's);
- 4. Vapor Intrusion Issues;
- 5. Potable/Production Wells;
- 6. Emergency Responses; and
- 7. Preliminary Assessment.

IV. Procedures - How to Use Guidance

The person responsible for conducting the remediation shall ensure that the CID contains a <u>concise summary</u> of all AOCs and major case components. The person responsible for conducting the remediation shall also include in each remedial phase report specific samples and tabulated results required by the Technical Requirements for Site Remediation (N.J.A.C. 7:26E) and not in the CID.

The person responsible for conducting the remediation shall ensure that all information about all AOCs and major case components are carried forward from the point that they are identified or prepared until a full site final remediation document has been submitted. The person responsible for conducting the remediation shall maintain each final remediation document issued for an AOC on this inventory and include dates when the AOC final remediation documents were issued.

The person responsible for conducting the remediation shall track the following information on the CID:

AOC Designation, Receptor, Emergency Response & Institutional Control Tracking

The first column of the document is where the AOC designation, receptor name, emergency response or institutional control is identified. This is the specific identifier of the area of concern or where a receptor emergency

response or institutional control is indicated. For example: AOC 1 – 3000 gallon #2 Fuel Oil AST. For a receptor, the name of the receptor is to be indicated (i.e., Potable Wells). When indicating an emergency response, the phrase "emergency response" will suffice. These designations remain unchanged for the duration of the remediation. The AOC designation shall be descriptive of the specifics of each particular area of concern. Overly general names such as "ASTs" are unacceptable. AOCs must be uniquely identified and keyed to the scaled site map. For institutional control tracking, the designation is the type(s) of each institutional control used at the site (i.e., deed notice, classification exception area). If there are multiple deed notices or classification exception areas, each would have a separate entry.

If conducted, the Preliminary Assessment would be added as a separate entry. This entry serves to identify the scope of the remediation and the number of areas of concern that have been identified.

Impacted Media

The impacted media column is to indicate which media has been impacted (i.e. ground water, surface water, soil, sediment, indoor air). This field remains unchanged for the duration of the remediation.

Contaminants of Concern (COC)

The contaminants of concern column is to provide a list of the contaminants that were noted in the AOC, impacting the receptor, or which were the cause of the emergency response. If there is a specific compound, it should be listed (i.e., Tetrachloroethene), or the more general terminology can be indicated (i.e., VOCs). COCs may be added as the remediation progresses but shall not be removed. Remediation of COCs shall be addressed in the Current Status/Final Outcome field.

Exposure Route

The exposure route column is to indicate the route that the contaminant would, is, or has taken to cause an exposure (i.e., ground water, surface water, overland flow, soil, etc.). Once the exposure route(s) is/are identified, this field remains unchanged for the duration of the remediation.

Receptors (Existing/Potential)

The existing receptor column is to indicate which receptors currently are or previously have been impacted by contaminants. The potential receptor column is to provide information on receptors that either have the potential to be impacted but have not been as of yet, or that may have been impacted but there is currently no data indicating that an impact has occurred. Once identified, receptors listed in these columns must not be removed. The Current Status/Final Outcome shall include how each receptor is being/was addressed.

Current Status/Final Outcome

The status and final outcome must include, and be updated with each submittal, a brief summary of the technical work that is completed at each AOC and include the following information:

- Identification of contaminants of concern.
- Indicate if the horizontal and vertical delineation was completed and specific standard/criteria (i.e., residential direct contact, non-residential direct contact, impact-to-ground-water, ground water remediation standards, surface water standards, vapor intrusion indoor air screening criteria, etc. The specific publication date of the applicable standard or criteria to which the horizontal and vertical delineation were completed must also be provided). For example, the soil contamination was delineated to the May 1999 residential direct contact soil criteria or the ground water was delineated to the July 2008 ground water remediation standards. The phrase "most stringent" is not acceptable.
- Remedial action for all impacted media; e.g., deed notice with engineering controls, classification exception areas, in-situ remediation, treatment system, etc.
- If remediation of the AOC is not complete, the summary must state a concise summary of future work/planned activities to be completed at the AOC.
- For institutional controls, this column would identify the areas covered by the institutional control, the specific preparation, drafting and filing status and technical summary.

Scaled Site Map

The person responsible for conducting the remediation shall attach to the CID a scaled site map covering the extent of the remediation with all AOCs identified, any monitoring wells, and ground water flow direction, if known.

V. Attachment

The attached Excel spreadsheet is an example of an acceptable Case Inventory for a site that has completed remediation.