



GUIDANCE DOCUMENT

Division of Environmental Response and Revitalization
May 2014

Procedures for Conducting Periodic Compliance Inspections

PURPOSE

This document outlines the procedures the Remedial Response Program (RR Program) uses to conduct periodic compliance inspections. Periodic inspections are conducted at sites with ongoing operation and maintenance (O&M) and long-term monitoring obligations. The general objectives of the inspections are to 1) verify compliance with performance standards, 2) verify compliance with the approved O&M Plan and Orders, and 3) identify changes in remedy protectiveness.

BACKGROUND

Periodic compliance inspections are conducted to confirm that the remedial action performance standards are being achieved and to ensure that the integrity of the remedies at sites that have completed state remedial response actions are being maintained through routine O&M and monitoring activities. The Remedial Design/Remedial Action (RD/RA) Generic Statement of Work (Task VI) states, "The Respondent(s) shall implement performance monitoring and operation and maintenance procedures as required by the approved Performance Standard Verification Plan (if applicable) and approved O&M Plan for the RA once it is demonstrated that the RA components are operational and functional." DERR certifies that remedies are operational and functional based on certification of construction completion.

O&M is required under the authority of Director's Final Findings and Orders (DFFOs)/Judicial Consent Decree (JCD) for RD/RA, Interim Action (IA), or O&M. In limited situations, a decision document may be issued that requires no engineering controls, thus there may be no Construction Completion Report and Certification. O&M may consist of only ensuring continuing property use restrictions. For sites that don't have Construction Completion Report and Certification, O&M activities will begin the date the O&M Plan is approved or on the date the O&M DFFO/JCD is issued.

IA DFFOs typically incorporate a remedy to be performed that includes provisions for operation and maintenance. The remedy could be as simple as property use restrictions or as complex as the construction of an interim treatment system with operation and maintenance provisions. If a Construction Certification Report is required by the Interim Action DFFOs, the O&M activities begin upon approval of the Construction Certification Report. For sites that don't have Construction Certification Reports, O&M activities will begin on the date that the O&M and monitoring plans are approved or, if appropriate, the date that the IA DFFOs are issued.

PUBLIC NOTICE

The RR Program may choose to issue public notices for periodic and 5-year remedy reviews. Occasionally, the RR Program publishes notice of Five-Year Reviews for sites under grant agreements with U.S. EPA, including federal lead sites listed on the National Priority List (NPL). For these sites, please review the terms of the contract to determine which agency will provide the public notice. Regardless, the public notice is to be prepared following Section 121 (c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 40 CFR §300.430 (f)(4)(ii).

For state lead sites, public notice is to be provided to inform the public that a 5-year remedy review will be conducted (and of the opportunity to review site-related documents and comment on the remedial actions), and once completed, to inform the public of the results of the 5-year remedy review. The public notice narratives are to be prepared and processed in accordance with the *Public Notice Procedures for Remedial Response Activities*, using the 5-year remedy review public notice templates located on the RR Program intranet page.

For federal lead sites, refer to the processes in U.S. EPA Office of Emergency & Remedial Response, "Comprehensive Five-Year Review Guidance," OSWER No. 9355.7-03B-P, EPA 540-R-01-007, June 2001. Public notice for 5-year remedy reviews for federal lead sites is similar to state-lead sites. However, as noted above, please review the terms of the contract between the state and federal agencies to determine which agency will publish the public notices.

The RR Program may conduct a periodic remedy review for a site at any time. In such instances, the public notice procedures outlined above will be used, as appropriate.

PROCEDURES

A. Frequency: Periodic compliance inspections will be conducted on an annual basis beginning one year after the Construction Completion Report is approved or the Interim Action is performed. The inspection frequency will be evaluated during each inspection. If the remedy continues to consistently meet performance standards, then the frequency may be reduced; however, the frequency will, in no case, be reduced to less than every two years. If the site coordinator recommends a change in the inspection frequency, they will meet with their management to determine a new schedule. Any change in an inspection schedule does not alleviate the Potentially Responsible Parties (PRPs) of their responsibility to implement their O&M Plan and scheduled inspections. Additionally, DFFOs/JCDs typically include requirements associated with a 5-year review. Site coordinators should review DFFOs/JCDs and ensure that periodic compliance inspections meet these requirements, as appropriate.

B. Pre-Inspection Activities: The site coordinator will conduct several preparatory activities and reviews prior to conducting the field inspection. (See Attachment V for an example of one approach to documenting pre-inspection activities.) An outline of key activities in preparation for field activities follows:

1. Review the approved O&M Plan, DFFOs/JCDs and related documents (see Attachment I).
2. Review monthly/quarterly/inspection reports, data, and applicable correspondence.
3. Review data generated during O&M and evaluate the overall effectiveness of the remedy compared to the performance standards.
4. Review previous annual inspection reports.
5. Determine the current status of applicable permits.
6. Verify financial assurance was established in accordance with DFFOs/JCDs.
7. Develop a site specific Periodic Compliance Inspection Form (Attachment II). The form should include all remedy components and performance standards for the specific site (see Exhibit 1 for possible remedy components to include).
8. Prepare a summary of performance standards to be incorporated into the inspection report (letter and attached inspection form) (see Exhibit 2).
9. Review pertinent guidance to enhance knowledge of O&M requirements for applicable remedy components.
10. Contact appropriate parties to schedule the site inspection.
11. If use restrictions are part of the remedy, verify if the restrictions are properly filed in the county are still in effect. If a property has been transferred, make sure the use restrictions were added to or cross-referenced in the deed.
 - (a) Identify and evaluate the property's use restrictions by reviewing: the deed restrictions or declaration of use restrictions; and, a property map and/or legal description to determine the extent of the property that's restricted and to know where to inspect.
 - (b) The property's deed records are located at the county recorder's office for the county in which the property is located. The county recorder will likely have its deed records indexed by:
 - (i) The tax parcel numbers, per the county auditor's office or

engineer's office using the property's address. This is likely the most reliable method as these are "permanent" numbers that are said to follow the property;

(ii) The name of the person or business transferring or accepting the property.

(iii) The dates when the property was transferred, per the most recent deed(s).

(c) To know which method will work best, the site coordinator should talk with the appropriate county personnel.

C. Inspection Activities: The inspection will focus on O&M of components of the remedy. Typical inspection activities will include:

1. Review of on-site operational logs and/or sampling records for compliance with any discharge permits.
2. Observations of general site conditions such as landscape, drainage, erosion, integrity of structures and fences and site security.
3. Inspection of all visible components of the remedial system such as wells, piping, treatment facilities, mechanical and electrical systems, equipment and any other engineering controls.
 - (a) Record observations regarding the operation and condition of mechanical systems.
 - (b) Note changes from the approved Final Design and O&M Plan. Document any changes in the Periodic Compliance Inspection Form.
4. Documentation of the current condition of the remediation system(s) with photographs, sketches, videos, or other visual media. Include these in the inspection report.
 - (a) Each area of the Site, if any, that may have a non-complying use.
 - (b) The Site's general use (*i.e.*, commercial building fronts with company signs shown).
 - (c) Photographs of different perspectives (*i.e.*, north, south, east, west views).

- (d) Each area of the site that was photographed and a site map noting what portions were photographed and at what position the photo was taken from.
5. A determination that compliance with institutional controls is in place.
- (a) Document current land use. If land use has changed from previous inspections, list type of structures, organizations, or activities in operation and photograph or sketch any structural changes.
 - (b) Note any site uses that do not comply with institutional controls. In some cases noncompliance may be easy to spot; in other cases the situation may require further evaluation. Some examples follow.
 - (i) If the use restriction limits property use to 'commercial uses only', a telemarketing firm would be an appropriate use. An on-site daycare or playground, however, may be a non-complying use depending on the actual use (is the use more residential or commercial; compare the land use categories defined in the declaration of restrictions).
 - (ii) If the use restriction 'prohibits extraction of ground water for any potable use', a well head or casing requires further information about the ground water's use.

Inspection Follow-Up: The site coordinator will complete the Periodic Compliance Inspection Form (Attachment II), if it was not completed during the inspection. After completing the inspection, the site coordinator/inspector will develop one of the following cover letters based on the inspection findings:

1. In compliance: If the inspection reveals that the PRP is in compliance with the DFFOs/JCDs and the approved O&M Plan, the site coordinator will draft and issue a Periodic Compliance Inspection Notice of Findings letter (Attachment III) with an attached copy of the Periodic Compliance Inspection Form (Attachment II). The site coordinator will issue the Periodic Compliance Inspection Notice of Findings letter within thirty (30) days of the date of the inspection.
2. Out of compliance: Out of compliance means the remedial action is not in compliance with Final Design, the DFFOs/JCDs, O&M Plan, performance standards, and/or approved work plans. See Table 1 for types of noncompliance and suggested enforcement responses. When considering an appropriate response, the site coordinator will need to consider the number of inspections conducted and their outcomes, the magnitude of non-compliance, and any patterns of noncompliance. The time-frame for actions will be site specific.

Table 1
Enforcement Response Matrix

Type of Noncompliance/Issue Requiring Action	Suggested Response
Failure to comply with the approved O&M Plan and Orders	
one occurrence	NOV(s)
multiple occurrences	NOV(s); Consensual DFFO with up front penalty; AGO referral with up front penalty
likely to cause an impact to human health and/or the environment	NOV(s); AGO referral with up front penalty
Change in protectiveness	
likely to cause an impact to human health and/or the environment	Amended Decision Document; Consensual DFFO; AGO referral

- (a) Minor (continues to meet performance standards; however is not complying with other parts of the approved O&M Plan).
 - (i) If the inspection reveals that the PRP is out of compliance with the DFFOs/JCDs or the approved O&M Plan, the site coordinator will draft and issue, at a minimum, a Periodic Compliance Inspection Notice of Violations (NOV) letter (Attachment IV) with an attached copy of the Periodic Compliance Inspection Form (Attachment II). The site coordinator will issue the NOV within thirty (30) days of the date of the inspection. The letter will require that the PRP provide a schedule for returning to compliance.
 - (ii) Conduct a second inspection to confirm that the conditions have been corrected and the remedy is in compliance. The site coordinator will issue a follow-up letter similar to the Periodic Compliance Inspection Notice of Findings letter, with a second Periodic Compliance Inspection Form (Attachment II). The site coordinator will issue the follow-up letter within thirty (30) days of the date of the inspection.
- (b) Major (fails to meet performance standards).
 - (i) If the inspection reveals that the PRP has failed to meet performance standards, the site coordinator will issue, at a minimum, an NOV letter (see Attachment IV) citing the specific sections of the DFFO/JCD and/or O&M Plan being violated and the

corrective action required to return to compliance, along with an attached copy of the Periodic Compliance Inspection Form (Attachment II). The site coordinator will issue the NOV within thirty (30) days of the date of the inspection. The PRP must provide a schedule for returning to compliance.

- (ii) A second inspection is required to confirm that the conditions have been corrected and the PRP has returned to compliance. The site coordinator will draft and issue a follow-up letter similar to the Periodic Compliance Inspection Notice of Findings letter, with a second Periodic Compliance Inspection Form (Attachment II). The site coordinator/inspector will issue the follow-up letter within thirty (30) days of the date of the inspection.
- (iii) If the Site is not returned to compliance, the site coordinator will recommend escalated enforcement action, as appropriate.

3. Remedy Failure: New remedy required (not meeting performance standards; the design of the system cannot achieve the performance standards).

- (a) If the inspection, or a series of inspections, indicates remedy failure, the site coordinator will review the Decision Document to determine if a contingent remedy was included. If so, the site coordinator will draft a letter (*i.e.*, NOV (Attachment IV)) identifying the performance standards not being met, the determination that the remedy has failed, the section of the Decision Document outlining the contingent remedy and the provisions in the DFFOs/JCDs authorizing Ohio EPA to require implementation of the contingency. A copy of the Periodic Compliance Inspection Form (Attachment II) will be attached to the NOV letter. The site coordinator will issue the NOV within thirty (30) days of the date of the inspection.
- (b) The site coordinator may develop a new remedy. Options to invoke a new remedy include the following:
 - (i) Determine whether the existing DFFOs/JCDs provides for the issuance of a decision document amendment, or whether new DFFOs/JCDs will be necessary.
 - (ii) If the existing DFFOs/JCDs allow additional work, the site coordinator will invoke the Additional Work provision.
 - (iii) If new DFFOs/JCDs are necessary, the site coordinator will develop and send a referral to the Enforcement Committee.
- (c) If the decision document contains a contingent remedy, then the

contingent remedy will be evaluated and triggered, as appropriate.

4. Change in Protectiveness: Change in operations or new remedy required.

If there is a change in protectiveness, the site coordinator will develop and provide a briefing memo and convene a meeting within thirty (30) days of the date of the inspection with the DERR district office (DO) manager and the RR Program manager to evaluate 1) the extent of the impact to potential receptors and the PRP(s) from the protectiveness change, 2) the potential costs in implementing, or not implementing, the new standard, and 3) the most appropriate action based on the foregoing.

- (a) If a change in the remedy to accommodate a change in protectiveness will be implemented, the site coordinator will communicate the new performance standards to the PRP within sixty (60) days of the date of the inspection.
- (b) The site coordinator will determine if an operational change under the DFFO/JCD can meet the new performance standards (e.g., operating a system for longer than the expected may achieve a lower standard).
- (c) The site coordinator may develop a new remedy. Options to invoke a new remedy include the following:
 - (i) Determine if further work can be done under the DFFO/JCD to issue a decision document amendment or if new DFFOs/JCDs are needed.
 - (ii) If the existing DFFOs/JCDs allow additional work, the site coordinator will invoke the Additional Work provision.
 - (iii) If new DFFOs/JCDs are necessary, the site coordinator will develop and send a referral to the Enforcement Committee.

5. Multi-media interaction: The site coordinator will determine if another Ohio EPA division should be contacted for compliance issues relating to applicable permits.

EXHIBIT 1

POTENTIAL SITE REMEDY COMPONENTS

<u>SITE</u>	<u>SECURITY/POPULATION</u>	<u>TREATMENT/DEGRADATION</u>
<u>PROTECTION</u> <ul style="list-style-type: none">○ Alternative Water Source Provided○ Fence○ Institutional Controls/Deed Restrictions○ Security Guard○ Other [define]		<ul style="list-style-type: none">○ Air Sparging○ Bioremediation, In Situ○ Bioventing○ Fugitive Dust Control Measure○ Incineration, Off-site○ Incineration, On-site○ In-situ Vitrification○ Land farming/Tilling○ Free Phase Product Recovery System○ Natural Attenuation○ Oxidant Injection○ Permeable Treatment Walls/Barriers○ Phytoremediation○ Pump & Treat with off-site discharge○ Pump & Treat with on-site disposal○ Soil Vapor Extraction (SVE)○ Soil Washing/Flushing○ Solidification/Stabilization○ Wetland Creation○ Other [define]
<u>CONTAINMENT</u> <ul style="list-style-type: none">○ Bottom Liner○ Cap, Asphalt○ Cap, Concrete○ Hydraulic Barriers/Groundwater Extraction○ Landfill Cap, Hazardous Waste○ Landfill Cap, Municipal Waste○ Landfill Gas Management, Active○ Landfill Gas Management, Passive○ Leachate Collection & treatment or removal○ Sheet Piling○ Slurry Wall tied into Cap○ Soil Cover○ Surface Water Diversion○ Other [define]		
<u>REMOVAL</u> <ul style="list-style-type: none">○ Excavate & Remove to Approved Offsite Landfill○ Excavate & Dispose in an On-site Landfill○ Remove & Recycle○ Other [define]		<u>MONITORING</u> <ul style="list-style-type: none">○ Aquatic Biological Survey○ Air Quality Monitoring○ Engineering Controls Monitoring○ Groundwater Quality Monitoring○ Landfill Gas/Subsurface Monitoring○ Surface Water Quality Monitoring○ Sediment Quality Monitoring○ Other [define in character field]
		<u>OTHER REMEDY:</u> [define]

EXHIBIT 2

Example Performance Standards Summary Table

List performance standards found in the Decision Document:

REMEDY COMPONENT	PERFORMANCE STANDARD(S)
1)	a) b) c)
2)	a)
3)	a) b)
4)	a) b)
5)	a)

ATTACHMENT I PERIODIC COMPLIANCE INSPECTION GUIDANCE LIST

Ohio EPA

Division of Air Pollution Control (DAPC) - Facility Inspection Form and General Instructions: Facility Wide and Emissions Unit Information (Appendix N) (internal guidance).

Division of Environmental Response and Revitalization (DERR), Voluntary Action Program (VAP) - Ohio EPA VAP MOA Track: Guidance for Content of an Operation and Maintenance Plan, Form #17, April 15, 2002 Final.

DERR, VAP, 5-Year Visual Inspection of Property Subject to Use Restrictions & Related Oversight (internal guidance).

DERR, Remedial Response - Statement of Work for Remedial Design / Remedial Action, DERR-00-RR-014, August 31, 1999.

Division of Hazardous Waste Management (DHWM) - Inspection Procedures Manual (Chapter 21.0 Closure Oversight Inspections), November 2002 (Checklist located in Appendix A) (internal guidance)

Division of Solid and Infectious Waste Management (DSIWM) - Closed Municipal Solid Waste Landfill Facility Inspection Checklist, August 2003.

Division of Surface Water (DSW) - NPDES Compliance Inspection Report (internal guidance)

DSW - Industrial User Inspection Form (internal guidance)

Office of Federal Facilities Oversight (OFFO) - Checklist for Review of Effectiveness of Institutional Controls, undated (Mound) (internal guidance)

Draft - Inspection Strategy for Institutional Control Compliance Inspections, Division of Hazardous Waste Management, May 16, 2002 (internal guidance)

U.S. EPA

Comprehensive Five-Year Review Guidance, OSWER 9355.7-03B-P, EPA 540-R-01-007, June 2001.

Elements for Effective Management of Operating Pump and Treat Systems, OSWER 9355.4-27FS-A.

Five-Year Review Process in the Superfund Program, OSWER 9355.7-08FS, EPA 540-F-02-004, April 2003

Guidance Manual for Conducting Sanitary Surveys of Public Water Systems; Surface Water and Ground Water Under the Direct Influence (GWUDI), Office of Surface Water, EPA 815-R-99-016, April 1999.

Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potentially Responsible Parties, EPA 540-G-90-001, April 1990.

Guidance on Expediting Remedial Design and Remedial Action, EPA 540-G-90-006, August 1990.

Inspector's Field Guides for Small Ground Water Systems and Small Surface Water Systems, 2003 editions.

Operation and Maintenance in the Superfund Program, OSWER 9200-1-37FS, EPA 540-F-01-004, May 2001.

Remedial Design/Remedial Action Handbook, EPA 540-R-95-059, June 1995.

Superfund Post Construction Completion: An Overview, OSWER 9355.0-79FS, EPA 540-F-01-009, June 2001

Institutional Controls: A Guide to Implementing, Monitoring and Enforcing Institutional Controls at Superfund, Brownfields, Federal Facility, UST and RCRA Corrective Action Cleanups, December 2002 (Draft)

Other

U.S. Army Corps of Engineers (ACE), Remediation System Evaluation (RSE) Checklists.

ATTACHMENT II

PERIODIC COMPLIANCE INSPECTION FORM

PERIODIC COMPLIANCE INSPECTION FORM I. GENERAL INFORMATION			
Name of Inspector:		Inspection Date:	
Construction Completion Date:		Date of Last Periodic Compliance Inspection:	
Site Name:		Site ID	
Operable Unit(s):			
Site Address: (attach map)		County	
Name and Address Current Property Owner(s):			
Name of Site Contact:		Telephone Number	
Address:			
Operators Name: (if applicable)		Telephone Number	
Persons Present During Inspection include Affiliations:			
II. CHECKLIST (Create a site specific checklist that includes all remedy components and any special requirements identified in the O&M plan.)			
<u>Site Security / Population Protection</u> (List all components that apply below)			
Findings:			
<u>Containment</u> (List all components that apply below)			
Findings:			

Removal (List all components that apply below)

Findings:

Treatment/Degradation (List all components that apply below)

Findings:

Monitoring (List all components that apply below)

Findings:

III. RECOMMENDATIONS:

ATTACHMENT III

EXAMPLE PERIODIC COMPLIANCE INSPECTION NOTICE OF FINDINGS

[Date]

[Contact's/Site Coordinator's Name]
[Title]
[Street Address]
[City, State Zip Code]

CERTIFIED LETTER

**Re: Periodic Compliance Inspection Notice of Findings - [County]
[Site Name - Type of Remedy]**

Dear [Contact/Site Coordinator]:

On [Date], Ohio EPA conducted a Periodic Compliance Inspection at [Company Name, Site Name] located at [Street address, City], Ohio. [Contact/Site Coordinator representing the [Company Name] was present during the inspection. This inspection revealed the following: [Summarize the findings of the inspection]. The attached inspection form documents the detailed findings from the compliance inspection.

If you have any questions, please call [Ohio EPA site coordinator] at [Area code and telephone number].

Sincerely,

[Name]
Site Coordinator
Division of Environmental Response and Revitalization
[District Office]

cc: [Names and Company Names including the enforcement coordinator in CO]

Attachment: Periodic Compliance Inspection Form

ATTACHMENT IV

EXAMPLE PERIODIC COMPLIANCE INSPECTION NOTICE OF VIOLATION

[Date]

[Contact's/Site Coordinator's Name]

CERTIFIED LETTER

[Title]

[Street Address]

[City, State Zip Code]

**Re: Periodic Compliance Inspection Notice of Violation - [County]
[Site Name - Type of Remedy]**

Dear [Contact/Site Coordinator]:

On [Date], Ohio EPA conducted a Periodic Compliance Inspection at [Company Name, Site Name] located at [Street address, City], Ohio. This inspection was performed in accordance with Section/Paragraph [X] of the Director's Final Findings and Orders (DFFOs) dated [DATE]; the [DATE] RI/FS OR RD/RA Work Plan and the [DATE] O&M Plan. The [Site Coordinator] and [names] represented the [Company Name].

This inspection revealed the following: [Summarize the findings of the inspection].

The attached inspection form documents the detailed findings from the compliance inspection. In accordance with the requirements of [note the authority section under which we are requiring action], you must implement the following actions: [List Findings and Recommendations].

(Company Name) may return to compliance by taking the actions listed above within (X) days of receipt of this letter. If (Company Name) fails to take either action by (Date), Ohio EPA will consider enforcement options available to the Agency.

If you have any questions, please call [Ohio EPA site coordinator] at [Area code and telephone number].

Sincerely,

[Name], Site Coordinator
Division of Environmental Response and Revitalization
[District Office]

cc: [Names and Company Names including the enforcement coordinator in CO]

ATTACHMENT V

EXAMPLE: PRE-INSPECTION CHECKLIST

GENERAL SITE INFORMATION			
Site Name	Laskin/Poplar Site	Site ID#	OHD061722211 204-0458
Date Started:	10/29/03	Site Coordinator:	Andrew Kocher
REVIEW OF DOCUMENTS			
Task to Complete	Yes	No	Not Applicable
Review O&M Plan	X		
Review DFFO	X		
Monthly Reports/Quarterly Reports	X		
Inspection Reports	X		
Data	X		
Correspondence	X		
Pertinent Guidance/Rules/Laws	X		
Additional Documents: 5-Yr Review	X		
CHECK AND/OR EVALUATE THE FOLLOWING			
Task to Complete	Yes	No	Not Required
Data Trends (as effecting performance standards)		X	
Current Status (Other Divisions)		X	
Applicable Permits			X
Financial Assurance Submittals	X		

Deed Restrictions/Declaration of Use Restrictions (must view deed and may require research.)	X		
CONTACT AND CORRESPONDENCE			
Task to Complete	Yes	No	Not Required
Contact appropriate parties to schedule the site inspection			X
Send confirmation letter for access letter			X
Obtain keys to access Site/Facility (if needed)	X		
PERFORMANCE STANDARDS			
REMEDY COMPONENT	PERFORMANCE STANDARD(S)		
Landfill cap	The cap must be maintained to protect the soil beneath which exceeds the lifetime cancer risk greater than 1×10^{-6} or a Total Hazard Index of 1.0.		
Diverted ground water	Diverted ground water must maintain levels below bedrock or MCLs at the down-gradient boundary.		
Meet Water Quality Standards	Water in Cemetery Creek must maintain levels below Ohio Water Quality Standards.		
Maintain concrete vault	The concrete vault containing asbestos/dioxin-contaminated material remains buried on the site until new technology can be used to successfully treat this waste.		

**Persons Present
During Inspection
include
Affiliations:**

II. CHECKLIST

(Create a site specific checklist that includes all remedy components and any special requirements identified in the O&M plan.)

Site Security / Population Protection (List all components that apply below)

ACCESS AND INSTITUTIONAL CONTROLS

Photo ID#

Condition of Fence/Gates:

Condition of Warning Signs:

Evidence of unauthorized access:

Are Institutional Controls being properly implemented/enforced(1):

ADDITIONAL COMMENTS: (1) During a Site Inspection, Institutional Controls (ICs) may be hard to recognize. For example: If the deed restriction or declaration of use restrictions prohibits the extraction of ground water for any potable use - look for any evidence of recently installed wells or ground water use. Another example: If the use restriction limits the property to commercial use - look for daycare centers and other uses of the property that may not constitute commercial use.

Findings:

GENERAL SITE CONDITIONS

Photo ID#

Evidence of Subsidence of Cap:

Evidence of Burrowing Animals:

Presence of Erosion Rills:

Vegetation Conditions:

Condition of Drainage System:

Evidence of Slope Instability:

ADDITIONAL COMMENTS:

Findings:

ENGINEERING CONTROLS

Photo ID#

Treatment Collection System Conditions:

Treatment System Conditions:

Effluent System Conditions:

Building Conditions:

ADDITIONAL COMMENTS:

Findings:
GROUND WATER MONITORING NETWORK INSPECTION
Photo ID#
Condition of Wells and Piezometers:
Condition of Well Identification Markers:
Condition of Diversion Trenches/Barriers:
ADDITIONAL COMMENTS:
Findings:
OFF-SITE INSPECTION
Photo ID#
Changes in Property Usage:
Evidence of Nearby Contamination:
ADDITIONAL COMMENTS:
Findings:
ON-SITE DOCUMENTS AND RECORDS VERIFIED
Photo ID#
O&M Manual:
Safety Plan:
Contingency Plan:
Permits and Service Agreements:
ADDITIONAL COMMENTS:
Findings:
O&M MAINTENANCE SUMMARY
Photo ID#
Maintenance Operator/s:
Maintenance Logs:
Activities Conducted Since Last Inspection:
1)
2)
3)
4)
Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy:
Findings:
III. RECOMMENDATIONS:

