

**8TH ANNUAL GEORGIA
ENVIRONMENTAL CONFERENCE
AUGUST 21-23, 2013**

**GEORGIA'S VOLUNTARY REMEDIATION PROGRAM – THE 4TH
YEAR
PROGRESS AND FLEXIBILITY**

Moderated by

DOUG CLOUD

Panel & Roadmap

- **Jeff Cown, Branch Chief, EPD Land Protection**
- **Jason Metzger, Unit 2 Manager, EPD Response & Remediation Program**
- **Mark Mitchell, President/Principal, Genesis Project, Inc.**
- **Greg Jones, Senior Environmental Specialist, AGL Resources**

THE VRP ACT OF 2009

- **Streamlined, privatized path for voluntarily remediating sites through the use of Registered Professionals.**
- **Incorporates RBCA standards that can decrease site costs while still protecting human health and the environment.**
- **EPD's oversight costs recoverable.**

Legislative Purpose

- **Encourage voluntary and timely investigation and remediation of properties for the purpose of reducing exposure to safe levels.**
- **Protect current and likely future use of groundwater.**
- **Ensure the cost-effective allocation of limited resources.**
- **VRP provisions take precedence over any conflicting provisions, regulations, or policies.**

VRP Basics - Qualifying Property

1. **Listed on the HSI; or**
2. **Brownfields; or**
3. **Otherwise have a release of regulated substances into the environment.**

VRP Basics - Participant Criteria

- 1. Property owner of the VRP property; or**
- 2. Express permission to enter to perform corrective action or implement controls pursuant to written lease, license, order, or indenture.**
- 3. Not be in violation of any Georgia environmental law.**

VRP Basics - Enrolling

- **\$5,000 + Voluntary Investigation and Remediation Plan.**
- **VRP prepared by registered professional engineer or geologist who has experience in responsible charge of the investigation and remediation of such releases.**
- **Upon EPD approval, property enrolled and applicant a VRP participant.**

VRP Basics - Implementation

- ❑ **RP oversees plan implementation in accordance with VRP.**
- ❑ **RP submits semi-annual status reports.**
- ❑ **Upon completion, CSR confirming consistency of the corrective action with VRP and certifying compliance with cleanup standards.**
- ❑ **Within 90 days of EPD concurrence, listed property removed from HSI.**

VRP Basics - Termination

- **Participant may terminate at any time.**
- **Director may terminate if:**
 - **Participant has failed to implement the plan in accordance with the VRP; or**
 - **Continued enrollment would pose an imminent or substantial danger to human health and the environment.**

VRP RBCA

- ❑ **Delineate to cleanup standards, not BG.**
- ❑ **Wider use of engineering/institutional controls.**
- ❑ **Fate and transport modeling to support real-world cleanup standards.**
- ❑ **Remediation not required beyond the point of technical impracticability.**

Simple Site VRP Options

- ❑ **Immediate RQSM re-scoring and delisting.**
 - **If demonstration made at enrollment that a release exceeding RQ did not exist at property.**
- ❑ **Soil-only cleanups for sites not listed for groundwater.**
 - **If demonstration made at enrollment that groundwater release exceeding RQ does not exist, then corrective action for groundwater is not required.**