



Site Remediation and Waste Management Program (SRWMP)

SRRA 2.0 Rule Making Stakeholder Meeting Remedial Action Permits

Monday, February 24, 2020

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Permit Types

- **Virtual Institutional Control (VIC)**
- **Permit by Rule (PBR)**
- **General Permit (GP)**
- **Remedial Action Permit (RAP)**



Questions

How is your proposal protective of public health and safety and the environment?

Which scenarios/contaminants fit into the proposed permit types?



Virtual Institution Control (VIC)

A VIC is a permit-like institutional control for a contaminated area established by an LSRP. The Department establishes and maintains a VIC using the data provided by the LSRP.





Permit –by-Rule (PBR)

A PBR is a permit to undertake a regulated activity for which the terms and conditions are established in a promulgated rule. A PBR is effective without prior written approval from the Department, provided all requirements established for that activity in the applicable PBR are satisfied.



General Permit (GP)

A permit to undertake a regulated activity for which the terms and conditions are established in promulgated rules.



Remedial Action Permit (RAP)

A RAP establishes the regulatory mechanism for:

- operating and maintaining certain remedial actions;
- monitoring the effectiveness of certain remedial actions; and
- submitting a biennial certification of the continued protectiveness of a remedial action that includes an engineering or institutional control.





Remedial Action Permit (cont'd)

A RAP does not:

- authorize any person to discharge any pollutant or hazardous substance; or
- relieve any person from the obligation to comply with all other applicable Federal, State, and local laws, rules, and regulations.



Questions

How is your proposal protective of public health and the environment?

Which scenarios/contaminants fit into the proposed permit types?





Exemptions

- Historic Fill/ Historically Applied Pesticides
- Municipalities
- Public Entities
- Developers