

*Illinois EPA's Voluntary Site
Remediation Program Site
Investigation Requirements and
All Appropriate Inquiry*

Process differs from AAI in as much as it
is intended to generate information
required for site remediation, not for the
purpose of providing liability relief

Investigation designed to identify all recognized environmental conditions and all related contaminants of concern that may be expected to exist at the site. Is performed in two phases

- Phase I uses ASTM 1527 unless alternative is approved by Illinois EPA
- Phase II shall determine nature, concentration, direction of movement, and extent of contaminants of concern

Report includes the following:

- Executive Summary
- Chapter on Site Characterization
- Chapter on Remediation Objectives Report
- Chapter on Remedial Action Plan
- Chapter on Remedial Action Completion Report

Executive Summary

- Designed to identify overall objectives of remedial action and technical approach used to meet objectives.
- Brief description of site
- Recognized environmental conditions
- Contaminants of concern
- Media contaminated
- Extent of contamination
- Anticipated post-remediation land use

Chapter on Site Characterization

- Listing of sources of information consulted
- Site history
- Site description
- Site base map
- Site sampling plan
- Documentation of field activities
- Endangerment assessment
- Conclusion
- Appendices
- Certification by LPE

Chapter on Remediation Objectives Report

- Justification for exclusion of an exposure route
- Comparison of findings to Tier I standards
- Comparison with Tier 2 and Tier 3 standards
- Use of background standards

Chapter on Remedial Action Plan

- Major components of plan– e.g. treatment, containment, removal
- Scope of problem to be addressed
- Schedule of activities
- Remedial technologies selected
- Confirmation sampling plan
- Current and post-remediation uses of property
- Applicable engineered barriers, institutional controls

Chapter on Remedial Action Completion Report

Objectives differ from that of AAI

- Underlying premise that contamination exists
- Primary goal is to obtain NFR letter

Why State managers and staff should know All Appropriate Inquiry:

- Many state superfund programs mirror or use the federal program or federal authorities
- There is indication that ASTM will change to meet the requirements of AAI
- CERCLA 104 (k) 128 (a) assessment grant requirements