



The Maine Voluntary Response Action Program (VRAP)

Nicholas J. Hodgkins, VRAP & Brownfields Program Coordinator

MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Protecting Maine's Air, Land and Water

The Voluntary Response Action Program (VRAP)

- Allows applicants to voluntarily assess & remediate (if necessary) properties
- Applicant pays the costs of assessment & remediation, including application fee (\$500) and VRAP staff costs
- VRAP provides protection from Department enforcement actions, as appropriate
- Typically involves properties involved with real estate transactions and re-financings



MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

www.maine.gov/dep

The VRAP Process

- File an application to the program, and submit all environmental reports for the property
- Wait for response back from VRAP regarding completeness/acceptance of the application
- Once assessment phase is complete, agree on an acceptable cleanup approach that addresses all identified risks (if risks exist)



MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

www.maine.gov/dep

The VRAP Process: Assessment Phase

- Phase I
 - Follow the ASTM Standard
 - Research all reasonably available information, including: tax maps, Sanborn Maps, aerial photos, historical documents, geologic maps, municipal records, DEP & EPA spill reports and site lists, etc.
 - Do a site visit/walkover
 - Interview site owner/past owners
 - Identify Recognized Environmental Conditions (RECs)
 - Report
- Phase II
 - Develop a Conceptual Site Model (CSM)
 - Potential sources of contamination
 - Potential receptors
 - Pathways of migration
 - Develop a Site Specific Quality Assurance Project Plan (SSQAPP)
 - Contaminants of concern
 - Media to sample
 - Quantity of samples
 - Methods for sampling & analysis
 - Quality data
 - Report



MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

www.maine.gov/dep

The VRAP Process-Cleanup Phase

- Identify receptors that are impacted above established Risk Based Guidance for the appropriate exposure scenario
- Determine how to reduce risks to an acceptable level
 - Removal/remediation to meet the guidance levels for a particular exposure scenario
 - Implement engineering controls to reduce risk
 - Place deed restrictions on the property that limit exposure and reduce risk



The VRAP Process-Cleanup Phase (cont.)

Remediation/Removal	Engineering Controls	Deed Restrictions
<ul style="list-style-type: none"> • Muck & Truck • In-situ 	<ul style="list-style-type: none"> • Cap/cover systems • Plume capture 	<ul style="list-style-type: none"> • Groundwater use prohibition • Property use restrictions



The VRAP Process-Cleanup Phase (cont.)

- Evaluate pros and cons associated with different cleanup options (a Feasibility Study (FS))
- Choose cleanup methods
- Implement cleanup
- Submit a Remedial Action Complete Report
- VRAP Issues final certification with protections from Department enforcement actions



The VRAP Process-Certification

- Issues protections from Department enforcement actions for:
 - Identified discharges that are remedied to the Department's satisfaction
- Final Certification comes in two forms:
 - No Further Action Assurance Letter
 - Certificate of Completion



VRAP—Is It Right For You?

- Cost
- Timing
- Risk Tolerance
- Benefit



MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

www.maine.gov/dep

The VRAP Process—End Results

- Allow property transactions to move forward
- Define costs, add value
- VRAP protections run with the land—successors & assigns are afforded the protections
- Clarifies liability, assigns responsibility



MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

www.maine.gov/dep

