

EMERGING TRENDS IN MARYLAND'S VOLUNTARY CLEANUP PROGRAM

- | | |
|---------------------|--|
| 8:45 – 9:00 | Opening Remarks |
| 9:00 – 9:45 | Maryland's Uniform Environmental Covenants Act (UECA) and its role in VCP Projects |
| <i>9:45 - 10:00</i> | Break |
| 10:00 – 11:15 | Revised VCP Guidance Document |
| 11:15 – 12:15 | Cleanup Standards, Field Screening, and Toxicology |



Department of the Environment

Environmental Restoration and Redevelopment Program

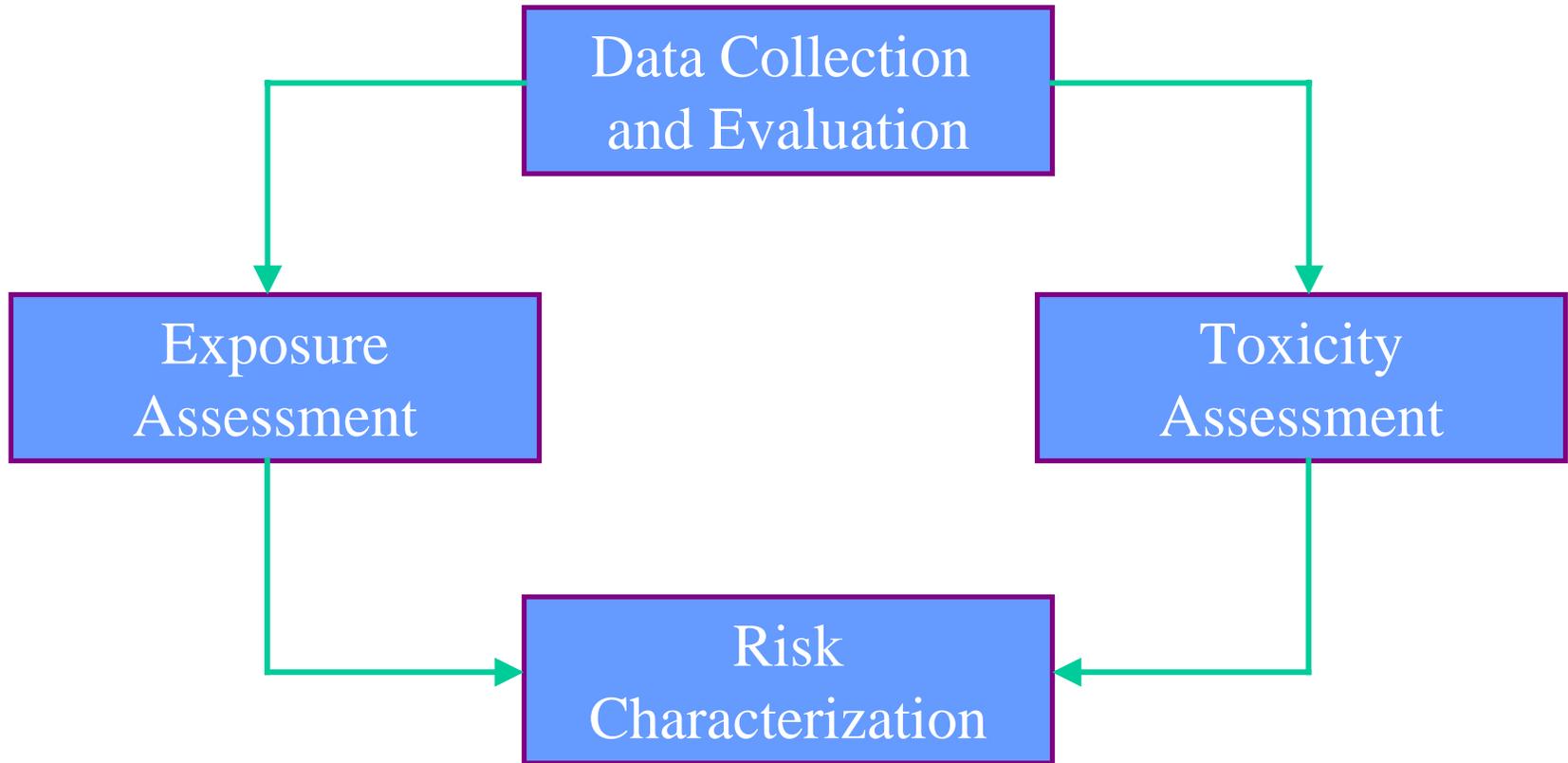
VCP Risk Assessments



Background

- Applicant performs risk assessment
- Applicant makes standards comparison
- Department performs assessment

Human Health Risk Assessments



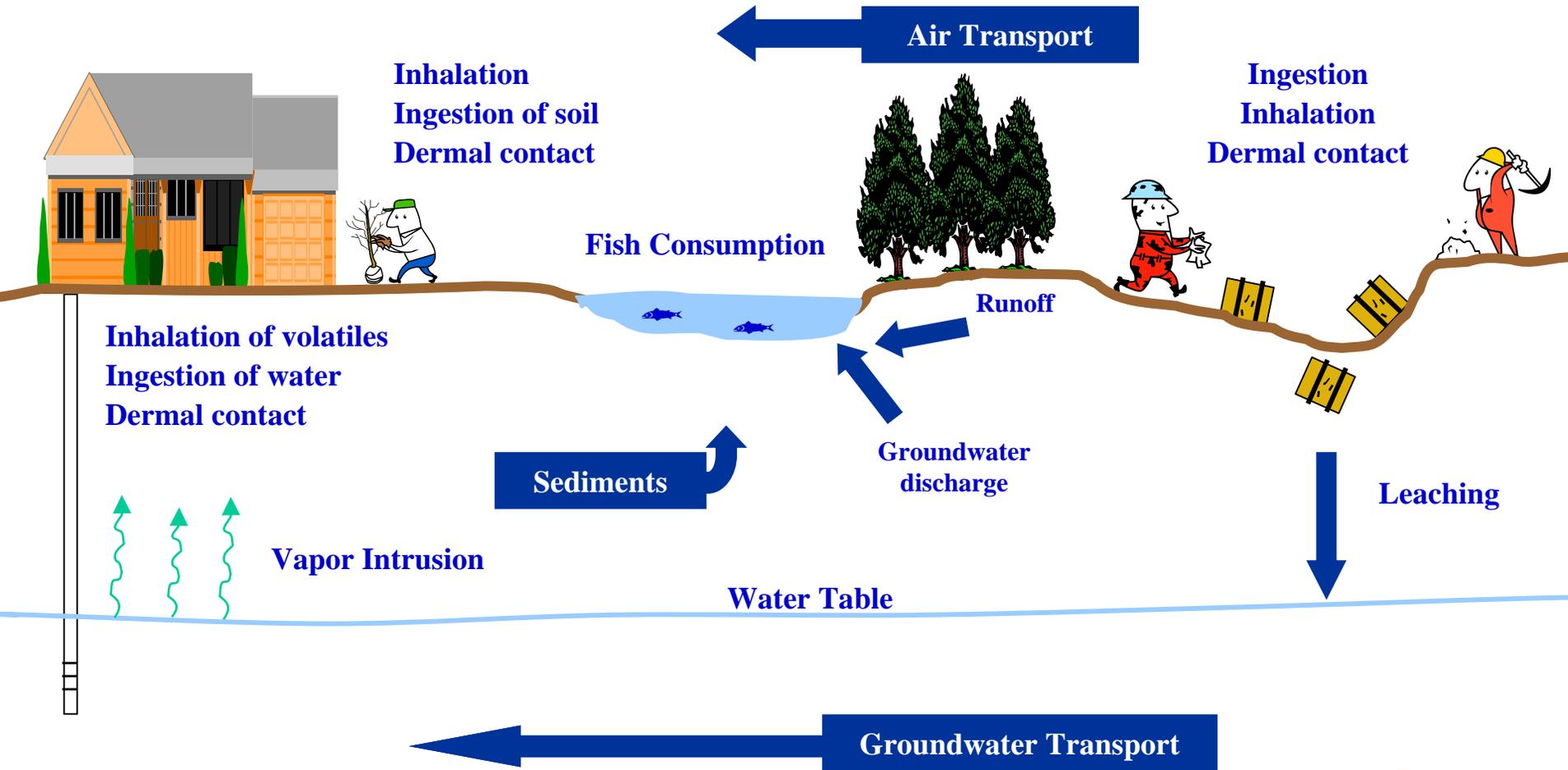
Data Collection

- Based on Phase I the applicant and Department select appropriate analytical suites
- Recommend but do not require validated data sets and quality control control measures during site characterization and sample analysis

Toxicity Assessment

- Region III RBC table
- Alternate reference doses and cancer slope factors may be considered by the Department when RBC is not available

Exposure Pathways



Exposure Assessment and Risk Characterization

- ❑ EPA's RAGS forms the basis for Department assessments within all ERRP Divisions
- ❑ The risk quantification equations and exposure assumptions are detailed in The Soil and Groundwater Cleanup Standards, August 2001

ERRP Action Thresholds

- MCLs for groundwater, Ambient Water Quality Criteria for surface water**
- All Other media, including soil, sediment, air, and surface water and groundwater when no AWQC or MCL exist:**
- Hazard Index of 1, cumulative or individual chemical**
- Cancer risk 1 in 100,000 (1×10^{-5}), cumulative or individual chemical**

Exceeding Action Thresholds

- Many Potential Responses, Applicant's are not limited:**
- Deed Restrictions**
- Engineering Controls**
- Removal, Remediation**

Ecological Risk Assessments

- When habitat is suitable an ecological screening versus ecological criteria is recommended
- When screening criteria are exceeded an ERA following the EPA Superfund's Eight Step ERA Process must be performed



Maryland Department of the Environment

Environmental Restoration and Redevelopment Program

1800 Washington Boulevard | Baltimore, MD 21230-1718
410-537-3000 | TTY Users: 1-800-735-2258
www.mde.state.md.us



Holland+Knight

*MDE Uniform Environmental Covenants
Act ("UECA") Workshop*

September 20, 2005

Amy L. Edwards, Esq.
(202) 457-5917

What Are Institutional Controls?

(AKA Land Use Controls (LUCs) or Activity and Use Limitations (AULs))

- **Institutional Controls Are an Integral Part of the Remedy Selection Process**

- **Four Basic Types of Institutional Controls**
 - **Proprietary Controls**
 - **State and Local Government Controls**
 - **Statutory Enforcement Tools**
 - **Informational Devices**

What Are Institutional Controls?

(AKA Land Use Controls (LUCs) or Activity and Use Limitations (AULs))

➤ Critical Role of ICs Has Been Implicitly Recognized in the Brownfields Amendments of 2002

- Affirmative Obligation Not to Impede the Integrity and Effectiveness of ICs and to be in Compliance With Land Use Restrictions**
- State Obligation to Maintain Registries of Brownfields Sites Relying on ICs**

Corrective Action and Institutional Controls

- **Deficiencies in Implementation/Enforcement of ICs Have Been Well Documented in Recent Years**
 - **ELI Study, “Protecting Public Health at Superfund Sites: Can ICs Meet the Challenge?” (July 2000)**
 - **ICMA Study, “Beyond Fences: Brownfields and the Challenge of Land Use Controls” (2000)**
 - **EPA IC Fact Sheets (October 2000) and Workshops (2001)**
 - **CPEO Forums (February and June 2000)**
 - **National Research Council Study (September 2000)**
 - **EPA Strategy to Ensure IC Implementation at Superfund Sites (September 2004)**
 - **GAO Report (released March 8, 2005)**

Proprietary Controls

- **Proprietary Controls Have Their Own Weaknesses. State Property Law:**
 - Requires horizontal and vertical privity
 - Frowns on "spurious" easements
 - Dislikes affirmative obligations
 - Requires appurtenant property interests
 - Requires covenants to "touch and concern" the land
 - Is limited by Marketable Title Act (generally, 40-60 years)

Uniform Environmental Covenants Act ("UECA")

- **With the support of DoD, the National Conference of Commissioners on Uniform State Laws ("NCCUSL") began a two-year effort in 2001 to develop a model law that would provide a better foundation for institutional controls.**

Uniform Environmental Covenants Act ("UECA")

- **The final model law required a series of compromises between traditional real property principles and environmental interests**

Uniform Environmental Covenants Act ("UECA")

- **The result was the Uniform Environmental Covenant Act ("UECA"), approved by the full Conference in August 2003**
- **The model law now needs to be adopted in all 50 states**
 - **UECA has been adopted in ten states to date, including Ohio (H.B. 516); South Dakota (S.B. 143); Kentucky (H.B. 472); Nebraska (L.B. 298); Iowa (SF 375); Maryland (H.B. 679); Maine (L.D. 1559); Delaware (S.B. 112); Nevada (S.B. 263); and W. Va. (S.B. 406)**

Uniform Environmental Covenants Act ("UECA") (*cont.*)

- **Legislation has been introduced in 9 other states so far this year**
- **Ten or more additional introductions are expected next year**

What UECA Will Do

- **Create a legal infrastructure for creating, modifying, terminating and enforcing AULs ("Super Servitude")**
 - **Broader universe of "holders"**
 - **Broader universe of "enforcers"**
 - **Runs with the land**
 - **Negates applicability of common law defenses**
 - **Can be modified/terminated**

What UECA Will Do

- **Perpetual in duration (unless limited by its terms)**
- **Cannot be extinguished by**
 - **Foreclosure of a tax lien**
 - **Issuance of tax deed**
 - **Adverse possession**
 - **Abandonment/waiver/lack of enforcement**
 - **Eminent domain, unless agency consents and all parties are given notice**
 - **Marketable Title Act**

What UECA Will Do

- Agency will always have the right to enforce
- Agency may be a holder, *i.e.*, grantee of a limited property interest, but doesn't have to be
- Notice as *required* by the agency to:
 - All who signed
 - All holding a recorded interest
 - All in possession
 - Local government

What UECA Will Do

- **Environmental Covenant must be recorded in local land records (optional notice when there is a state registry)**
- **Environmental Covenant may be enforced by:**
 - **Any party to the covenant**
 - **Any person granted the express right to enforce**
 - **Agency**
 - **Municipality**
 - **Any person whose liability may be affected by violations of the covenant**

What UECA Will Do

- **Environmental Covenant must:**
 - **State that it's an Environmental Covenant created pursuant to the Act**
 - **Contain a legally sufficient description of the real property**
 - **Describe the activity and use limitations (AULs)**
 - **Identify holder (*i.e.*, grantee of the Environmental Covenant)**
 - **Be signed by**
 - ♦ **The agency**
 - ♦ **Owner(s)**
 - ♦ **Holder**
 - **Identify name/location of administrative record**

What UECA Will Do

- **Optional Information: The "Roadmap"**
 - **Environmental Covenant may include**
 - ◆ **Other restrictions and rights agreed to by the parties**
 - ◆ **Notice of**
 - **Transfer**
 - **Proposed changes in use**
 - **Permits/site work**

What UECA Will Do

- **Optional Information: The "Roadmap"**
 - **Environmental Covenant may include**
 - ◆ **Periodic reporting**
 - ◆ **Brief narrative description of contamination and remedy**
 - ◆ **Restrictions/limitations on amendment**
 - ◆ **Rights of the holder beyond right to enforce**

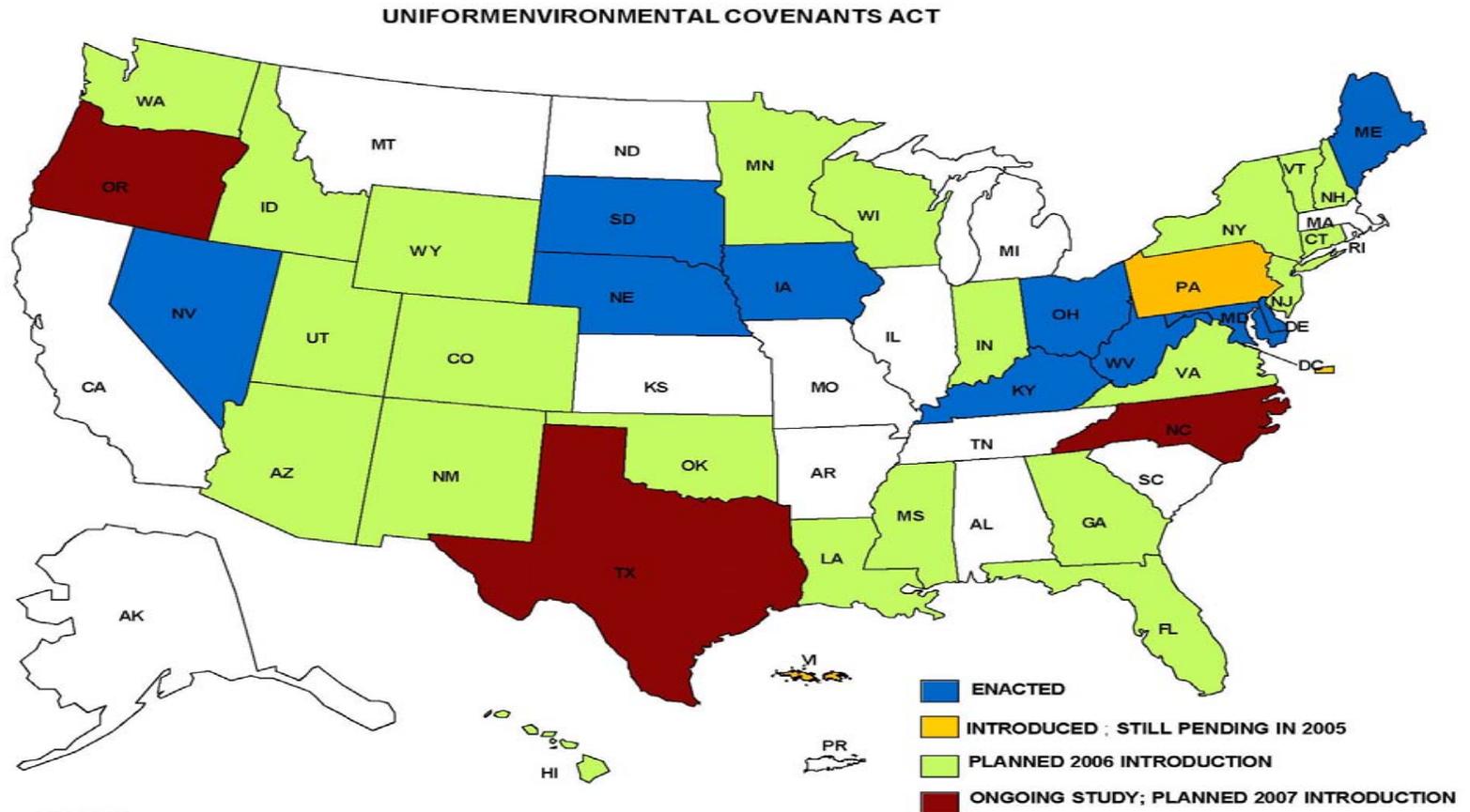
What UECA Will NOT Do

- Provide this "Super Servitude" tool for purely private transactions
- Bind prior interests in the property unless those interests are subordinated
- Provide standards for remediation or the specific AUL
- Provide independent condemnation authority

Next Steps

- **Final draft was approved by the full Commission in August 2003**
- **The model UECA law must now be introduced in individual state legislatures**
 - Enacted in 10 states so far
- **Approximately 25 states plan to evaluate and/or introduce this bill in their legislatures in 2005-2006, including:**
 - Connecticut H.B. 5612 (Stone)
 - Colorado SB05-246 (Grossman)
 - Minnesota H.F. 1154 (Emmer) S.F. 1426 (Hottinger)
 - Washington, D.C. B16-0147 (Mendelson)
 - Hawaii S.B.1162 (Hee) H.B. 1706 (Morita)
 - Pennsylvania H.B. 1249 (Rubley)
 - Oregon H.B. 3286 (Scott)
 - Vermont H. 496 (Keenan, Young)

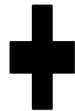
Uniform Environmental Covenants Act Status as of September 2005



August 18, 2005



Department of the Environment



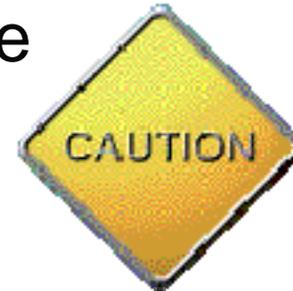
An Environmental Covenant is...

- “...a legal device that restricts activities on sites where some contamination remains in place.”
- Use Restrictions/Institutional Controls used to supplement cleanup measures
- Employed to protect human health



VCP Land Use Controls...

- Allow for use restrictions and institutional controls to supplement cleanup measures
- NFRDs and COCs commonly employ land use controls as a way to reach closure



UECA and VCP?

- Complementary Brownfield Redevelopment Tools



- Environmental Covenants can supplement NFRDs / COCs issued by VCP
- Provide greater certainty that land use restrictions will be enforced

UECA/VCP Comparison

	Environmental Covenant	NFRD / COC
Describe activity and use restrictions for the property	●	●
Describe holder(s) of Covenant on the property	●	◐
Description of use restriction required to be recorded with land records	●	●

UECA/VCP Comparison

	Environmental Covenant	NFRD / COC
Real property legal description as well as the activity/use limitations	●	●
Identify Holder/Recorder of Restriction	●	◐
Notification requirements	●	●
Description of contamination and remedy	●	●





Maryland's Brownfields Initiative

Presented by

Jim Carroll

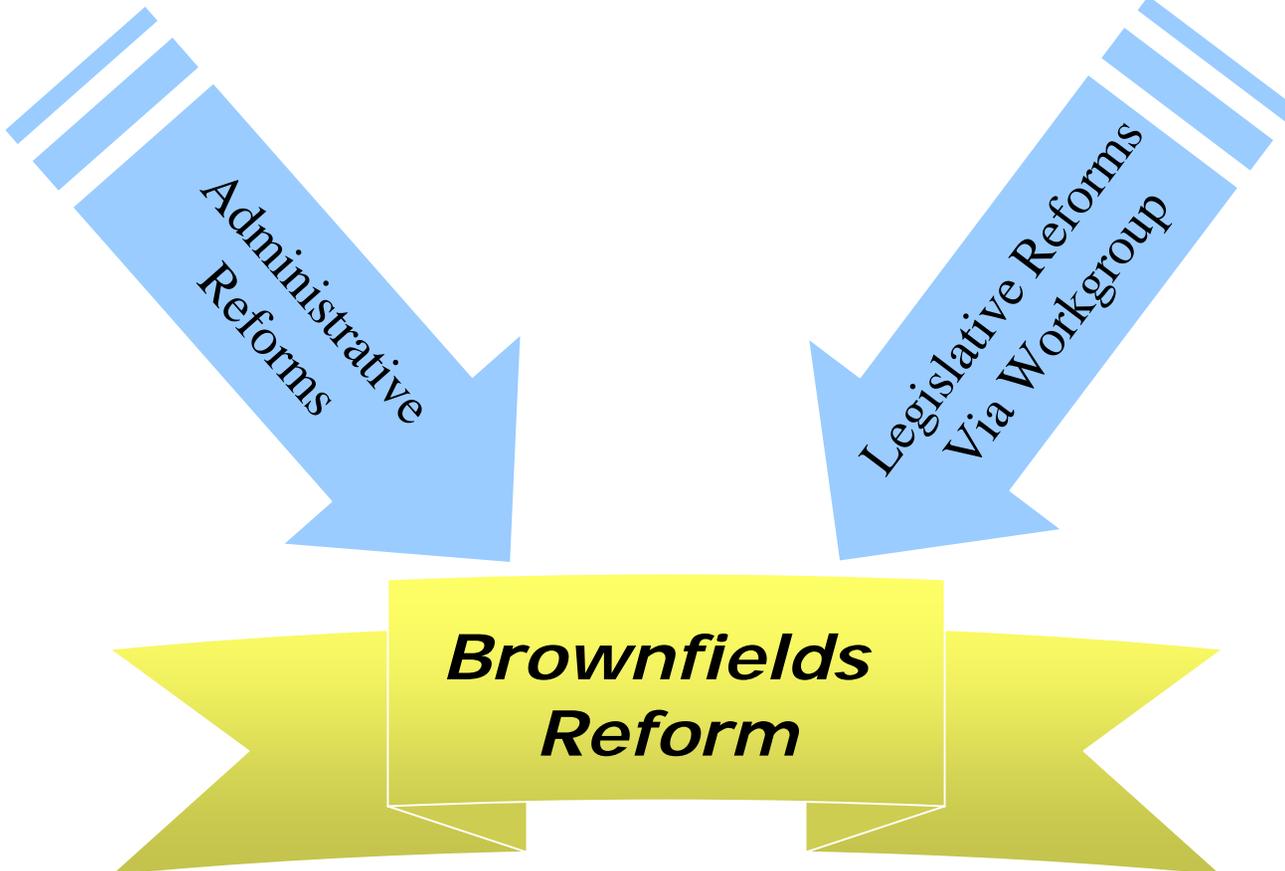
Program Administrator



Maryland Department of the Environment

Environmental Restoration & Redevelopment Program

Started Brownfields' Reform Initiative
September 3, 2003



Administrative Reforms

Goal #1 – Improve Customer Service

Objectives

1. Enhance Customer Service
2. Improve Efforts to Encourage Economic Development
3. Simplify Application Process

Results

- Establish a Brownfields Marketing Coordinator
- Coordinator Interacts With DBED and Local Economic Development Agencies
- Revised Application Form and Updated Guidance Document

Administrative Reforms

Goal #1 – Improve Customer Service (cont'd)

Objectives

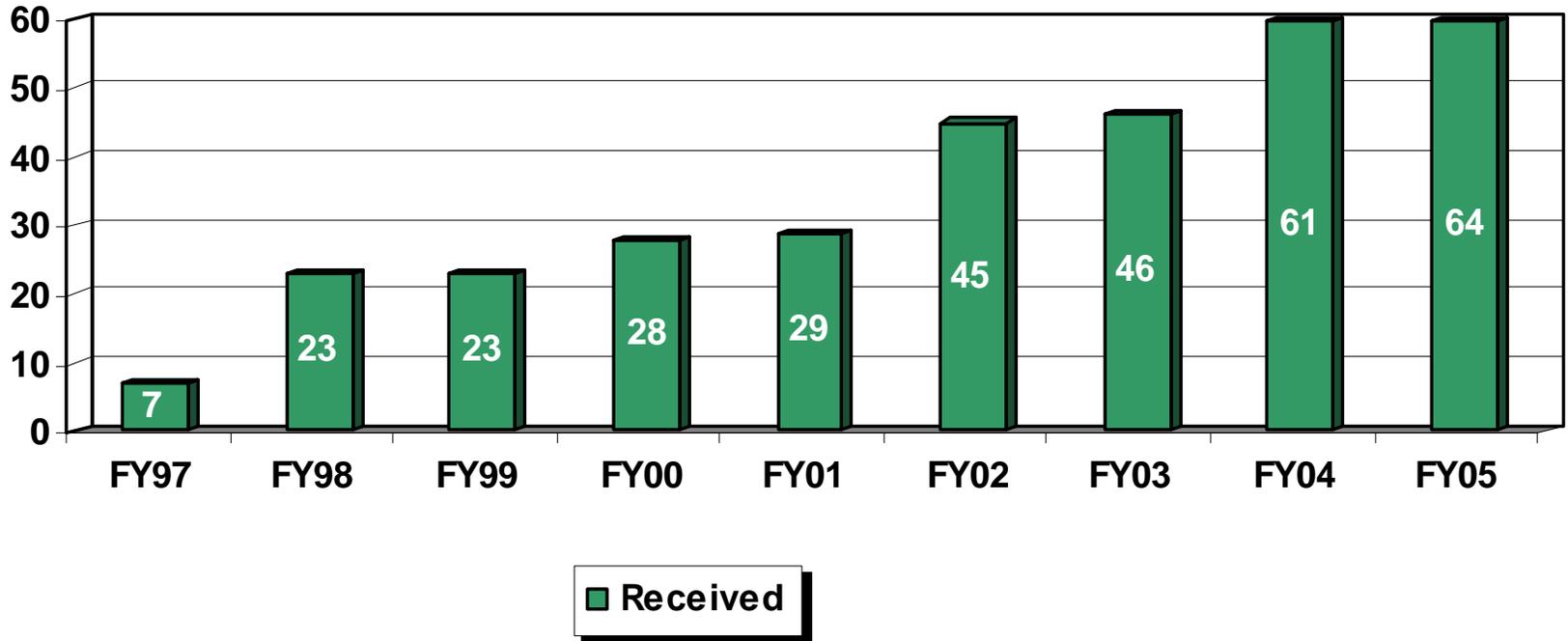
4. Improved Public Access to Information
5. Training For Regulated Community
6. Public Outreach

Results

- Internet Access to Public Records Through GIS-Based Website
- VCP Workshops (11/17/03 and 9/20/05)
- Administrative Reforms Kickoff Event with Gov. Ehrlich (11/21/03)

VCP Applications Received

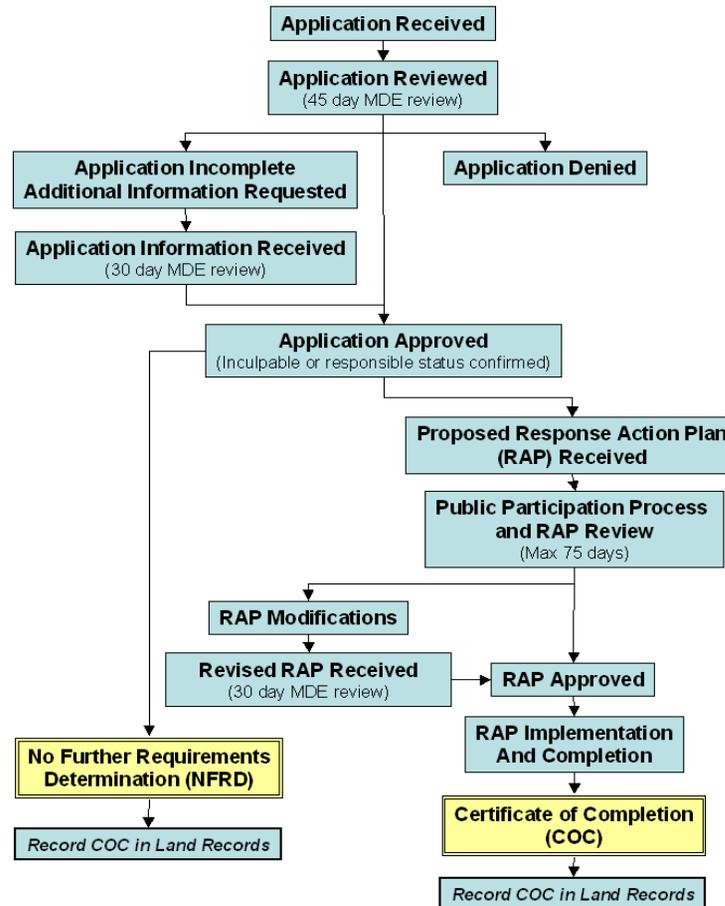
Results of Improving Service



Brownfields Legislation - 2004

Application Process

- Requires Only Phase I Environmental Site Assessment (ESA) to Enter the VCP
- Phase II ESA Required, Unless MDE Determines No “Recognized Environmental Conditions of Concern” at the Site
- Effective October 1, 2004



Brownfields Legislation - 2004

Fees

Activity/Description	Fee Amount
Initial Application Fee: Non-refundable fee for the first VCP application for the property.	\$6,000
Subsequent Application Fee: Subsequent application regarding the same property or contiguous or adjacent properties that are part of the same Planned Unit Development (PUD) or similar development plan.	\$2,000
Premier Service: Applicant requesting expedited determination as Inculpable Person.	\$2,000
Institutional Controls Fee: Issuance of NFRD or COC conditioned on certain uses or on the maintenance of certain conditions.	\$2,000
Changes/Revisions: Request by participant to alter the record of determination in the land records for an eligible property with certain conditions.	\$2,000

Expanded Site Eligibility

Sites Under Active Enforcement



Oil-Contaminated Sites



Liability and Enforcement

ENFORCEMENT

- Allows State to Seek Treble Damages From Recalcitrant Potentially Responsible Parties
- Funds 3 New State Superfund Enforcement Positions

LIABILITY

- Contribution Protection for Applicants at No Further Requirements Determination Stage



Project Review Times



- Application Review Time Reduced to 45 Days
- Response Action Plans Review Time Reduced to 75 Days

Increased Public Protections

- Notify Miss Utility for Remedies That Include Institutional Controls
- Workgroup to Study Uniform Environmental Covenants Act (UECA)
- Requires Public Notice of Application and Public Meetings for All Cleanups



Redevelopment Incentives

- Brownfields Revitalization Incentive Program Eligibility Expanded (Dept. of Business and Economic Development (DBED))
 - Properties Acquired by Local Government Under Eminent Domain/Condemnation
 - Allows Funding for Petroleum Investigations
- Local Governments Authorized to Access Private Property for Environmental Testing



Department of the Environment



**As of October 1, 2004,
The Voluntary Cleanup Program
is Accepting Applications for
Properties with
Known or Perceived
Oil Contamination**

See Section 8 of the Revised Guidance Document



Properties Ineligible for the VCP Due to Emergency Conditions



- Petroleum vapors
- Contaminated water supply wells
- Free product release
- Underground utility impacts

MDE VCP and OCP Will Work Together...



- Tank Removals
- Compliance Inspections
- Emergency Response
- Off-site Impacts

COMAR 26.10 Still Applies to All Sites

Applying to the VCP: Information Needed In the Application Package



- Active Tanks
- Abandoned Tanks
- Future Use of Each Tank



VCP Sampling Requirements

- TPH-GRO vs VOC (EPA 8260)
- TPH-DRO vs SVOCs (EPA 8270)
- Metals, PCBs, Pesticides etc.



VCP or OCP?





Department of the Environment

Voluntary Cleanup Program

September 20, 2005

Application Process

Inculpable Person/Responsible Person Discussion



Inculpable Person/Responsible Person

- Inculpable Person – No prior or current ownership at time of VCP application and has not caused or contributed to contamination on-site.**
- Responsible Person – Owner or operator of a site contaminated by controlled hazardous substances.**

IP Determination Process

- Entity must match VCP application.
- Cannot show up in title search.
- Title search versus title insurance.
- Title search done by title company.



IP Determination Process (Continued)

- IP affidavit.
- Original VCP applicant signature on IP affidavit.
- Notarized IP affidavit.



IP Status Letter

- Expedited 5 day turnaround.
- Request for IP status letter with application. (3-4 weeks)
- IP status granted at completion of VCP process.

Day 1 Day 5
Expedited

Day 1 Day 28
Regular with Application

Day 1 Day 45
IP Status Granted



Department of the Environment

**Environmental Restoration
and
Redevelopment Program**

Voluntary Cleanup Program

**VCP Application Checklist
Public Notice Requirements**





VCP Application Checklist

Attachment III

Voluntary Cleanup Program Application

VCP Application Attachment III

VCP Application Checklist

Although not mandatory, applicants are encouraged to complete this checklist to help expedite review of the application package. VCP staff will use the checklist to verify that an application package is complete and will notify the applicant of missing items and any other deficiencies.

Property Name: _____

Applicant: _____

Date: _____

I. APPLICATION

A. Completed Application Form

Each application question must be completed.

B. Statement of Certification

An original, signed Statement of Certification, must be included with the application and with each subsequent submission of information regarding the property.

D. \$6,000 Application Fee

Please mail the \$6,000 application fee to the address listed in Attachment I of the application.

C. Inculpable Person Status Affidavit

For those applicants seeking inculpable person status (see Section V of the application), please complete and include Attachment II, "Inculpable Person Affidavit," with the application. Applicants requesting an expedited (within five business days) inculpable person determination must submit the \$2,000 fee to the address listed on Application Attachment I.

II. ENVIRONMENTAL SITE ASSESSMENTS

For each item, indicate the location of the requested information (e.g., attachment number or document title with date and page numbers).

A. Current Property Conditions Since Completion of the Phase I Report

Document the property conditions existing at the time of application and summarize any changes that have occurred at the property since the most recent Phase I site assessment.

Location: _____

B. Current and Past Uses of the Property

1. Provide a complete listing of the entities that have owned and/or occupied (including tenants) the property from the time of first agricultural, commercial, or industrial use or 1940, whichever is earlier. Identify the name and type of each business, the years of occupancy, and the nature of the on-site operations.

Location: _____

2. Describe the controlled hazardous substances and petroleum products each business stored and handled (or was likely to have stored and handled at the property and discuss the potential for any environmental.

Location: _____





VCP Application Checklist

Commonly Omitted or Incorrect Items

I. APPLICATION

- Property Information Incorrect
- Statement of Certification
- Application Fee
- Inculpable Person Status Affidavit





VCP Application Checklist

Commonly Omitted or Incorrect Items

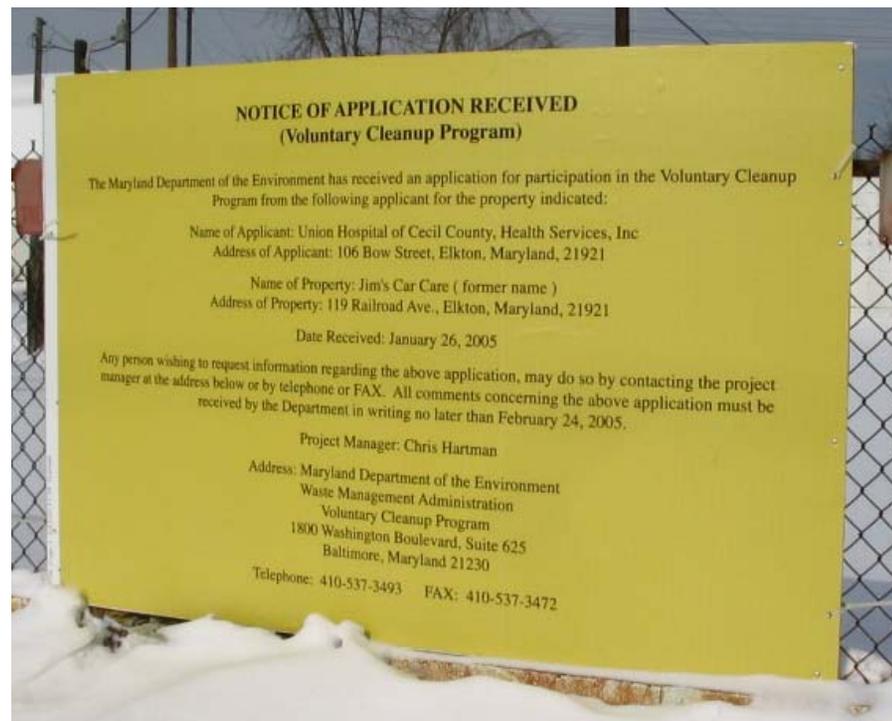
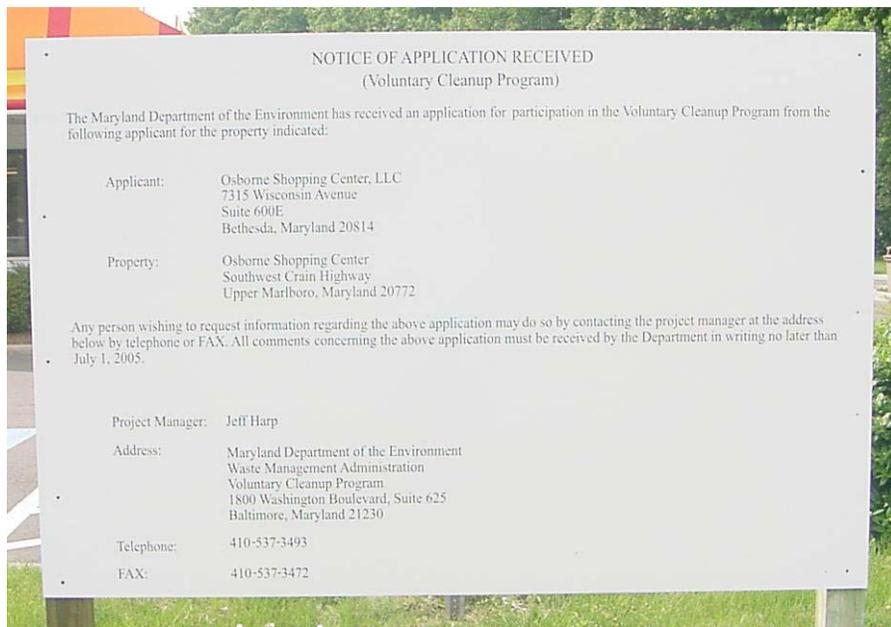
II. ENVIRONMENTAL SITE ASSESSMENTS

- Current Property Conditions
- Historic Maps and Aerial Photographs
- Scaled Site Plan
- Groundwater Use Investigation
- Groundwater Contour Map



Public Notice Requirements

Sign Examples



- ❑ **Upon submission of an application to MDE, the applicant must post a sign at the property indicating application to the program.**

Public Notice Requirements

High Visibility Sign Locations



- ❑ The sign must be located in an area of the property with the highest visibility and volume of traffic and remain standing and legible for the entire 30-day comment period.



Template for Public Notice Sign

Attachment Six

Voluntary Cleanup Program Guidance Document



Maryland Department Of The Environment Voluntary Cleanup Program

Attachment Six Template for Public Notice of Application to the VCP

On submission of an application to the Department, the applicant must post a notice at the property that includes the information presented in the following template. The posted notice must (a) be located in the area of the property with greatest visibility and highest volume of traffic; (b) be at least six (6) feet wide by four (4) feet high; and (c) remain standing, and its printed message maintained in a legible condition, for the entire 30-day comment period.

The applicant is requested to submit photographs (digital or print) documenting that the sign is located in an area with high visibility and traffic volume and that text is properly printed in accordance with the following template. In addition to the public notice posted at the property, the Department will post a notice of the application on the Department's website: <http://www.mde.state.md.us/brownfields>.

NOTICE OF APPLICATION RECEIVED (Voluntary Cleanup Program)

The Maryland Department of the Environment has received an application for participation in the Voluntary Cleanup Program from the following applicant for the property indicated:

(Name of Applicant)
(Address of Applicant)

(Name of Property)
(Property Address)

Any person wishing to request information regarding the above application may do so by contacting the project manager at the address below by telephone or FAX. All comments concerning the above application must be received by the Department in writing no later than *(30 days after posting of the sign)*.

Project Manager: *(check with Department)*
Address: Maryland Department of the Environment
Waste Management Administration
Voluntary Cleanup Program
1800 Washington Boulevard, Suite 625
Baltimore, Maryland 21230
Telephone: 410-537-3493
FAX: 410-537-3472





Maryland Department of the Environment

Environmental Restoration and Redevelopment Program

Any questions regarding the application process should be directed to Jim Metz of the Voluntary Cleanup/Brownfields Division at 410-537-3493.

1800 Washington Boulevard | Baltimore, MD 21230-1718
410-537-3000 | TTY Users: 1-800-735-2258
www.mde.state.md.us





Department of the Environment

Environmental Restoration and Redevelopment Program

RESPONSE ACTION PLAN (RAP)





Which Way To Go From Here??



- The Phase II is complete - - Now What?? - -
- Do the NFRD – No Unresolved REC’s / No Unacceptable Risk, BE HAPPY ‘n HAVE A NICE DAY
- Do the COC – Some Unresolved REC’s / Some Unacceptable Risk, BE HAPPY ‘n HAVE A NICE DAY (AND INCLUDE A RAP)



WHAT DRIVES THE RAP??

- 7-508 – “Requirements of the Response Action Plan” – Statutory Requirements
- VCP Guidance Document: www.mde.state.md.us
- Chronology of Events



CHRONOLOGY OF EVENTS

- Submission of the proposed RAP / Posting of Public Notice Sign / Newspaper Public Notice – Then, the clock is ticking.....**
-VCP clock ticks for 30 days to receive public comments.....**
-Mandatory public meeting within 40 days.....**
-VCP accepts / issues comments within 75 days.....**
- Participant re-submits revised RAP within 120 days of receiving VCP comments**
- VCP responds within 30 days.....**



.....WAY UP FRONT

- PLEASE DON'T BEGIN CONSTRUCTION UNTIL THE RAP IS APPROVED !!
- THIS REQUIRES COORDINATION BETWEEN THE PARTICIPANT, THE CONSULTANT, THE SUB-CONTRACTORS, AND THE VCP – IT'S A MATTER OF COMMUNICATION AMONG ALL OF US !





THINGS TO REMEMBER



Imported Top-Soil :

- You don't want to exacerbate the problem, so VCP needs to know where the soil comes from & whether it meets the appropriate cleanup standards

- This requires coordination with the subcontractors

- PLAN AHEAD** - good idea to pre-qualify the proposed source of imported soil.



THINGS TO REMEMBER



Excavated Soil:

- The RAP should include the proposed disposal facility and the required analytical disposal criteria
- PLAN AHEAD - good idea to pre-qualify the proposed disposal facility.

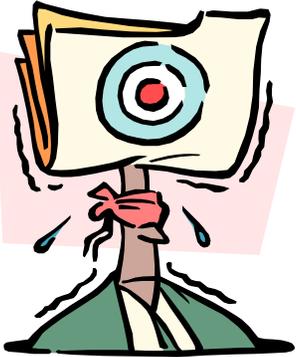


.....ANOTHER THING

Imported Crushed Concrete

- ❑ *Problem* – VCP needs representative sample, typically lab analyzed for at least SVOCs & PCBs, maybe TPH – Source usually not capable of dedicating the temporary on-site storage area.

ONE MORE.....



PERFORMANCE BOND IS ONLY FOR SITE STABILIZATION – NOT FOR THE PROJECT COST

“SITE STABILIZATION” MEANS \$\$\$\$ NECESSARY TO SECURE & STABILIZE THE SITE IF THE RAP IS NOT COMPLETED

SO.....IN CONCLUSION

HAPPY RAPPING.....SO A LITTLE BIT OF THIS



.....**MAY LEAD TO LOTS OF THIS!**



AND HAVE A GOOD DAY !!



Maryland Department of the Environment

Environmental Restoration and Redevelopment Program

1800 Washington Boulevard | Baltimore, MD 21230-1718
410-537-3000 | TTY Users: 1-800-735-2258
www.mde.state.md.us





Department of the Environment

Environmental Restoration and Redevelopment Program

Analytical Laboratory Capabilities



MDE encourages the use of sample-screening technologies to characterize properties

- ❑ In an effort to keep analytical costs down while completing a thorough site characterization, MDE offers to screen site samples using X-ray Fluorescence Spectrometry (XRF), Gas Chromatograph/Mass Spectrometer (GC/MS) and immunoassay. The screening process can greatly reduce analytical costs by reducing the number of samples submitted to a fixed laboratory for certain analytical parameters.

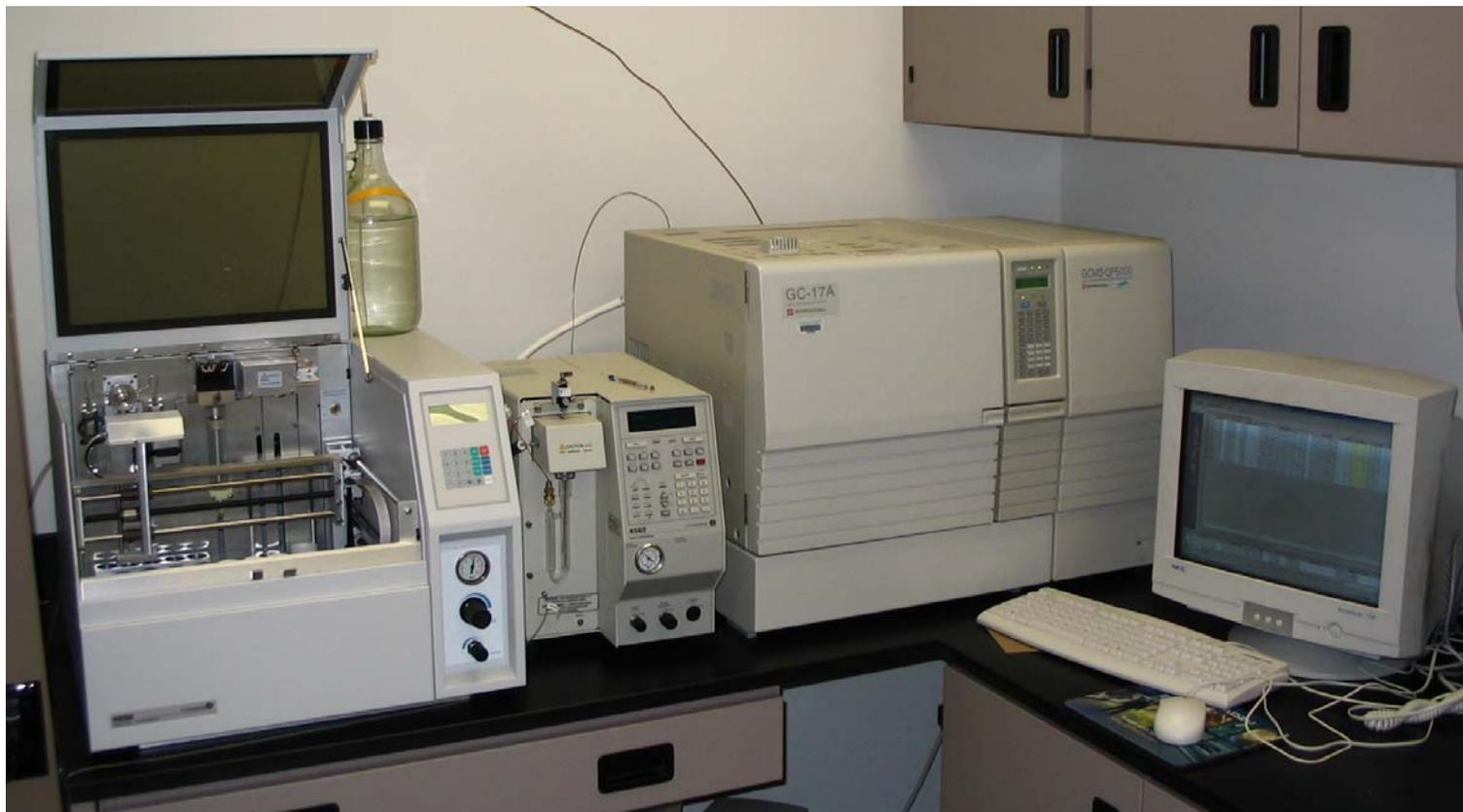
X-ray Fluorescence Spectrometry



X-ray Fluorescence Spectrometry

- Analytical Capabilities:
- V, Ti, Ca, Ti, Cr, Mn, Fe, Ni, Cu, Zn, Se, As, Au, Cd, Sb, Ba, Pb, Hg
- Analysis limited to soil

Gas Chromatograph/Mass Spectrometer



Gas Chromatograph/Mass Spectrometer

- Analytical capabilities:
- Purge and Trap, VOCs by Method 8260
- Soil and groundwater analysis

Immunoassay

- Analytical capabilities:
- PCBs, Carcinogenic PAHS, Select Pesticides and RDX
- Analysis limited to soil

Collection and Handling Procedures

- Guidance Document Attachment 4 – MDE Screening Sample Collection Protocol



Request For MDE Sample Screening Analytical Services Form Guidance Document Attachment Three



Maryland Department Of The Environment Voluntary Cleanup Program

Attachment Three Request For MDE Sample Screening Analytical Services

REVIEWED/APPROVED BY:

	INITIALS	DATE
Requestor/PM		
Section Head		

REQUESTED BY: _____ DATE: _____

CLIENT AUTHORIZATION TO BILL (SIGNATURE): _____
DATE: _____

ESTIMATED SAMPLING DATE: _____

REQUESTED ANALYSIS TURNAROUND TIME (CIRCLE): 7-DAY 14-DAY

PCA Code _____

Object Code _____

Site Name _____

Circle Program:

VCP Non-Site-Specific

DESCRIPTION OF SERVICES

XRF Metals		Immunoassay		GC/MS		Other	
Unit price per sample: \$1.50		CaPAH unit price per sample: \$35.00 (1-19); \$27.00 (20 or more)		VOCs at no charge			
		PCB unit price per sample: \$35.00 (1-19); \$27.00 (20 or more)					
Unit Price	Total	Unit Price	Total	Unit Price	Total	Unit Price	Total
SUBTOTALS							
						TOTAL	

Estimated labor charges listed below will vary based on the number and condition of the samples:

LABOR	ESTIMATED HOURS	APPROX. RATE	ESTIMATED TOTAL	Actual Hours (to be completed by MDE)			TOTAL
				HOURS	RATE	DATES	
			TOTAL	TOTAL			

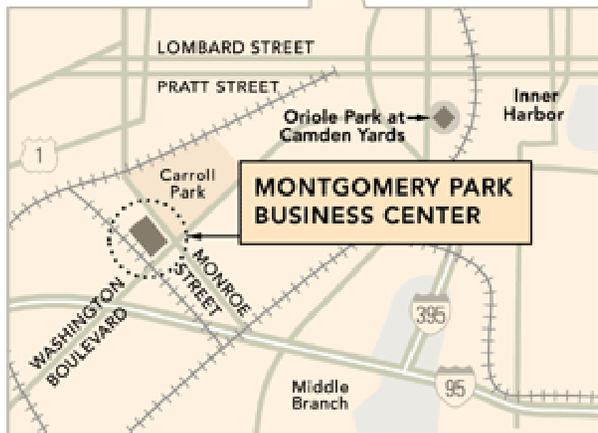
ESTIMATED GRAND TOTAL _____ FINAL GRAND TOTAL _____



Sample Disposal

- Upon completion of sample analysis the applicant is responsible for sample disposal

DIRECTIONS TO MDE FOR SAMPLE DROP OFF



- ❑ The applicant's environmental consultant must collect and deliver the samples to MDE with the appropriate chain of custody documentation. Samples may be scheduled for delivery to MDE during business hours (9am to 5pm) Monday through Friday, samples delivered after 10am on Thursdays will not be analyzed until the following week.