

CONSULTANTS' DAY 2015

20th Anniversary
DNR's
Remediation
& Redevelopment
Program

Reporting Requirements:
NR 700.11, NR 706, NR 708 and NR 716.05

**Jason Lowery, Hydrogeologist &
Spills Response Team Leader
Wisconsin DNR**

Hosted by DNR's
Remediation & Redevelopment Program



Key Points

- Why & How NR 700.11 Progress Reporting is done
- When to report a discharge
- How to report a discharge
- 10-Day Sample Result Notification
- What is "No Action Required"
- What is "No Further Action"



NR 700.11 Progress Reporting

Purpose

Compliance with existing rule

- confirm progress
- up-to-date contact info



NR 700.11 Progress Reporting



Overview

Who – Responsible Parties

What – Open and conditionally closed cases

When – Within 30 days of end of 6-month period

How – electronically

NR 700.11 Progress Reporting



ID emailed or request ID at:

<http://dnr.wi.gov/botw/NR700Request.do>

Wisconsin Department of Natural Resources
Environmental Cleanup & Brownfields Redevelopment

NR700 Semi-Annual Site Progress Report - Report ID Request Form

State law requires responsible parties submit site progress reports semi-annually until final case closure is granted by the Department of Natural Resources. Use this form to request a Report ID to facilitate the on-line reporting of an NR700 site progress report. The Report ID will receive unique identifies the which you wish to report. The reporting period, and verifies the person using the ID is authorized to submit the report. Once approved you will receive an email ID, and together the email address the Report ID will be used automatically for each reporting period.

Enter the NR700 number (or address):

Please provide your contact information:

Name: Email:

Enter the information in the address field as would be used in the NR700 report:

Address:

If you're having trouble, please contact dnrhelp@dnr.wisconsin.gov or call 1-800-441-2946.

NR 700.11 Progress Reporting



Enter ID at

<http://dnr.wi.gov/botw/NR700Enter.do>

Wisconsin Department of Natural Resources
Environmental Cleanup & Brownfields Redevelopment

NR700 Semi-Annual Site Progress Report

State law requires responsible parties to submit site progress reports semi-annually until final case closure is granted by the Department of Natural Resources. Enter the Report ID you received below. This number uniquely identifies the Activity for which you wish to report, the reporting period, and verifies the person using the ID is authorized to submit the report.

Please Enter the Report ID:

NR 700.11 Progress Reporting

Wisconsin Department of Natural Resources
Environmental Cleanup & Brownfields Redevelopment

NR700 Semi-Annual Site Progress Report Report ID: 150154490123456

Wisconsin state law requires responsible parties submit site progress reports semi-annually until final case closure is granted by the Department of Natural Resources. If the site is PECFA eligible or currently receiving PECFA funding, you must include the estimated cost of work remaining in the investigation. By filling out this form, you are no longer required to use the PECFA Web Reporting system for this site.

Reporting Period: 7/1/2014 - 12/31/2014
Report Due By: 01/30/2015
BRRTS No: 03-31-55555
PECFA No: 54216-1234-92
Activity Name: SOME PROPERTY
Address: 54201 MAIN ST, MUNICIPALITY
DNR Project Manager: PROJ MANAGER 920-555-1212 p.manager@wisconsin.gov

1 - Please select the current status of this site activity:

2 - If a report has been submitted during the reporting period, please indicate the type and date of the report. If no activity occurred during the reporting period, please indicate why:

NR 700.11 Progress Reporting

Reporting Rates

Round	Dates	IDs	Rec'd	Percent
1	1st Half of 2014	1,884	1,569	83%
2	2nd Half of 2014	1,945	1,669	86%

NR 700.11 Progress Reporting

Goal is 100% Compliance
How?

- Updating BRRTS with RP/consultant info
- Outreach to Consultants / RPs
- Mass Mailing RPs (that haven't reported)

NR 706 Reporting 

Hazardous Substance = Present or potential hazard to human health or the environment



Which are Hazardous Substances? 



NR 706 - Exemptions 

STATUTORY

- Permitted Discharges
- Pesticide and Fertilizers



DE-MINIMUS

- Reportable Quantities



NR 706 - Reportable Quantities

Don't apply if:

1. The spill was not immediately cleaned up or evaporated
2. Threat to or impacts to environment
3. Threat to or impacts to human health
4. Safety Hazards



Emergency Reporting

REPORT SPILLS IMMEDIATELY

1-800-943-0003



Wisconsin's 24-Hour
Spill Emergency Hotline
dnr.wi.gov - Search "Spills"

National Response Center: 1-800-424-8802

NR 706.05(1)(c) Non-Emergency Discharges

- Phase II ESA or Roadwork
- Notify via Form 4400-225 (Notification of Hazardous Substance Discharge – Non-Emergency)
- Fax or Email (don't call)
- Include Lab Results, Map, and Other relevant information



No Action Required - Overview

- Minor discharge or none confirmed
- DNR determines no investigation or remedial action needed – s. NR 716.05(2)
- Common for tank closure assessments & Phase II reports
- “09 Case” in BRRTS



No Action Required – Why?

- Purpose: Share information with public
- Example Needs
 - Property transactions
 - Future development



No Further Action - Overview

- Discharge confirmed above criteria
- Immediate Action - meets criteria in ch. NR 708.05
- Spills & tank removals (with discharges)
- Less \$ and simpler than NR 726 closure



No Further Action - When



Apply to Immediate Actions – s. NR 708.05

- Emergency (Spills) – s. NR 708.05(2)
- Non-Emergency – s. NR 708.05(3)(b)
 - 1.No imminent threat
 - 2.≤ 100 cubic yards (unless otherwise approved)
 - 3.Immediate response
 - 4.No further action required after immediate response

No Further Action - Report



No Further Action Report – s. NR 708.09(1)

- Who, what, when, where, and how
- Site conditions (land use, geology, receptors, etc.)
- Factors accelerating migration (weather, fire suppression water, etc.)
- Residual contamination?
- Confirmation sampling (if necessary)
- Other relevant information

**Submit within 45 days

NAR/NFA Response Letters



- Generally only upon request
- NAR - \$700 - General Liability Clarification Letter (see [RR-619](#))
- NFA- \$350
- Use Form [4400-237](#)

Save... Print... Clear Data

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wis.gov

Technical Assistance and Environmental
Liability Clarification Request
Form 4400-237 (R 10/13) Page 1 of 6

Notice: Use this form to request a written response (on agency letterhead) from the Department of Natural Resources (DNR) regarding technical assistance or liability clarification for property with known or suspected environmental contamination. A fee may be required as is authorized by s. 282.05, Wis. Stats., and s. 19.31, Wis. Admin. Code. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.]

Summary: NFA vs. NAR 					
Action	Code	Fee	Product	Discharge	Examples
No Further Action (NFA)	NR 708	\$350	NFA letter	Above criteria	Spill or small, immediate, & complete cleanup.
No Action Required (NAR)	NR 716.05(2)	\$700	GLC letter	Not confirmed or below criteria	Phase 2, "Clean" Tank Pull. No cleanup.

Summary of Key Points 	
<ul style="list-style-type: none"> • Why & How NR 700.11 progress reporting is done • When to report a discharge • How to report a discharge • 10-Day Sample Result Notification • What is "No Action Required" • What is "No Further Action" 	

Questions & Contacts	
<ul style="list-style-type: none"> • NR 700.11: Tim Zeichert, Hydrogeologist, (608) 266-5788 timothy.zeichert@wisconsin.gov • NR 706: Jason Lowery, Spills Response Team Leader (608) 267-7570 jason.lowery@wisconsin.gov • NR 708: Judy Fassbender, Policy & Tech. Resources Section Chief, (608) 266-7278 judy.fassbender@wisconsin.gov • Liability Clarification Letters, Michael Prager, Land Recycling Team Leader, (608) 261-4927 michael.prager@wisconsin.gov 	
 Thank you for attending Consultants' Day 	
