Cleanup Verification and Certification Process

In partial fulfillment of TRP element: Mechanisms for approval of a cleanup plan and verification and certification that cleanup is complete.

*Site Being Referenced on This Form: _____________________________________*

The following process will accompany and/or succeed environmental cleanup activities for sites known to contain hazardous substances, pollutants, contaminants or petroleum on ___________ Tribal lands:

1) A draft Quality Assurance Project Plan & Sampling and Analysis Plan (QAPP/SAP) for verification samples will be generated if not included in the Phase II Assessment QAPP. This can be an amendment to the QAPP that was developed for the Phase II Assessment and/or amendment to the Tribe’s Generic QAPP. The Contractor conducted confirmation sampling according to the plan he had submitted with his QAPP.

2) At a minimum, the QAPP/SAP will be reviewed by:
   a. The Brownfields Tribe Brownfields Program Coordinator;
   b. The U.S. EPA and/or IHS and/or a Qualified Environmental Contractor; and
   c. The QAPP will be approved by EPA prior to sampling activities.

   **All above activities a. – c. were completed.**

3) Verification samples will be collected and analyzed to ensure predetermined cleanup standards have been met or exceeded. **Verification samples were collected and analyzed meeting predetermined cleanup standards. Results were documented in the Final Report.**

4) A certification of “cleanup complete” will succeed verification sampling and shall:
   a. Specify whether the site requires No Further Action or if Post-Cleanup Actions are required;
   b. Include details of any Institutional Controls for the site; and
   c. Be signed by Brownfields Coordinator or authorized representative;

   **Because all contamination was removed, No Further Action and No Institutional Controls are required. Signature is at bottom of form.**

5) At the completion of a cleanup, a report will be prepared on the cleanup operation and actions taken. The report will contain the following items:
   a. Documentation of cleanup actions taken and any modifications made to the cleanup activities;
   b. Documentation that the actions that were taken met the cleanup level targets established in the Agreement and/or Scope-of-Work with contractor;
   c. Documentation of results of verification sampling that shows cleanup levels have been met; and
   d. A copy of the signed cleanup complete certification (from #4 above or equivalent)
All above activities a. – d. were documented in the contractor’s Final Report.

__________________________________            3/1/2011
Signature                                      Date
Brownfields Tribal Response Program Coordinator
(Administrative Contact and Principal Investigator for the Brownfields Grants)

Cleanup Plan Approval Process

In partial fulfillment of TRP element: Mechanisms for approval of a cleanup plan
and verification and certification that cleanup is complete.

Site Being Referenced on This Form: ________________________________

The following process will precede the approval of environmental cleanup plans for
sites known to contain hazardous substances, pollutants, contaminants or petroleum
on ___________________ lands:

1) A draft cleanup plan/s will be generated by a qualified environmental
   professional* and/or Tribal Brownfields staff and will be available for public
   comment.
2) At a minimum, the cleanup plan/s will be reviewed by:
   a. The _________________________ Brownfields Tribal Response Program
      Coordinator; and/or
   b. The U.S. EPA and/or IHS and/or a qualified environmental contractor.
3) An Analysis of Brownfields Cleanup Alternatives (ABCAs) will be generated and
   put out for public comment. One of the cleanup alternatives in the ABCAs will be
   selected by Tribal Brownfields Coordinator in consultation with pertinent Tribal
   Programs and Administration and the Tribe will respond to comments on the
   ABCAs. The ABCAs may be included with the Cleanup Plan.
4) A Health and Safety Plan will be generated.
5) A Community Relations Plan will be generated.
6) A final Cleanup Plan will be generated and approved by __________________
   Tribal Response Program Coordinator.

________________________________            ___________
Signature                                      Date
Brownfields Tribal Response Program Coordinator
(Administrative Contact and Principal Investigator for the Brownfields Grants)

* A qualified environmental professional (QEP) is someone who has “experience with
on-site coordination, direction, and review of environmental cleanup activities, and
experience with or knowledge of cleanup requirements.”