



## New Hazardous Site Response Act Notification Form

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Rindt-McDuff Associates, Inc.

The Georgia Environmental Protection Division Hazardous Site Response Program Manager Tim Cash and the Program Unit Coordinators, Jim Brown, Alexandria Cleary and Jane Hendricks presented the **New HSRA Release Notification Form** at the May 4, 2000 Georgia Bar Association, Environmental Law Section meeting. This article highlights the changes in the new notification form.

The **New Release Notification Form** was designed to minimize a redundancy of paper work submitted for multiple regulated substances released from the same physical location and release episode, and to provide some additional data that the previous form did not require.

### CHANGES AT A GLANCE:

- Must provide the **owner's name**
- Must include a **tax map** and **Parcel Identification Number**
- Furnish the **address of the nearest drinking water well**
- Give the **name of the nearest residence, playground, day care or nursing home**
- Furnish **originals of all laboratory analytical sheets**
- Requires a **site map showing the suspected source area and locations of soil or ground water samples that have been collected**
- Provides **tables to list each regulated substance released to the soil and ground water and the associated analytical results**
- The new Notification Form became effective as of **May 4, 2000**

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# Membership

To become a member of the GA Chapter, or renew your membership, please contact Sam Mason, Membership Chair ([sam.mason@genmills.com](mailto:sam.mason@genmills.com)) or Delo Morris ([dmorris@rindt-mcduff.com](mailto:dmorris@rindt-mcduff.com)).

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*Air & Waste Management Association Newsletter* is a quarterly publication of The Georgia Chapter of the Air & Waste Management Association.

Our mission is to promote a cleaner, safer environment in Georgia by focusing on air and waste issues. We achieve our mission through information transfer, technology exchange, education and environmental leadership.

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## New Commercial Environmental Laboratory Accreditation Rules

Ted V. Jackson, GA EPD

Starting July 1, 2001, if you have analyses performed by a commercial analytical laboratory and the data are used for EPD regulatory purposes, that laboratory should be accredited. New rules that will be effective later this year may affect air quality permittees, hazardous waste facilities, and water or wastewater treatment providers — anyone who provides analytical data to EPD.



### Law and Definitions

Georgia state law (O.C.G.A. § 12-2-9) requires all commercial environmental laboratories submitting data to the Environmental Protection Division for regulatory purposes to be approved or accredited as specified in EPD's rules and regulations. Additionally, any person submitting data prepared by a commercial analytical laboratory to the Division for regulatory purposes shall stipulate that the laboratory is approved or accredited.

The responsibility for submitting acceptable analytical data lies with the person subject to regulation under Georgia's environmental statutes, permits and rules.

### Commercial Environmental Laboratory means:

Any laboratory which provides analyses of environmental samples on a fee or contract basis. A laboratory operated by the State, a city, county, local authority, or an industrial facility is typically not considered a commercial environmental laboratory.

### Approved means:

The acceptance of a commercial laboratory by accreditation or certification. The approval is valid for the time period and tests included in the scope of accreditation.

### Data submitted for regulatory purposes means:

Any data which is to be submitted to the Environmental Protection Division, or required to be retained on site for review by EPD, except for:

- Initial Hazardous Site Response Act (HSRA) data;
- Data obtained from *in-situ* analysis;
- Tests for which accreditation or certification are unavailable.

**Effective Date:** July 01 2001 (☼ New date)

### Benefits

- ☼ Improve credibility and acceptability of data to customers and regulators.
- ☼ Replace redundant and often contradictory inspections with comprehensive standardized inspections.
- ☼ Enhance the laboratory's ability to compete in Georgia, nationally, and internationally.

### Accrediting Authorities

Commercial environmental laboratories may obtain accreditation from the any of the following authorities:

- ☼ National Environmental Laboratory Accreditation Conference / Program (NELAC or NELAP) These state agencies have become accrediting authorities under this USEPA sponsored program: CA, CO, FL, IL, KS, LA, NH, NJ, NY, PA, UT  
Internet: [www.epa.gov/ttnela1/](http://www.epa.gov/ttnela1/)

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## New Hazardous Site Response Act Notification Form

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Jim Brown, EPD, pointed out that the **Reportable Quantity Screening Method equations and input values have not changed for any reportable parameter.** Further, the regulations have not changed in that there is still *"no duty to sample prior to notification"* (Rule 391-3-19-.04 (1)). **New features** of the form include a **Part-III Soil Release Information Table** and a **Part-IV Groundwater Release Information Table.** In **Part-III** each **regulated substance released to the soil** is to be listed along with the CAS number. Three columns are provided to enter the highest soil concentration detected (if sampled) for each regulated substance between the depths of 0-6 inches, 6-24 inches and greater than 24 inches. Clarification was offered that sampling each of the three depths is not required, one need only enter the data for the depth sampled. **Part IV** of the new form is **intended to document regulated substances that were released to groundwater.** This section provides columns to enter each regulated substance, CAS number, highest concentration detected (if sampled) and the sample depth below ground surface. In the event either soil or ground water was sampled, it is now **required to submit originals of all laboratory sheets.**

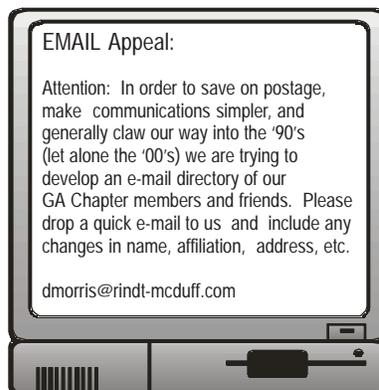
**New additions** to the Release Notification Form **include a requirement to provide a site map** that shows, *"the known or suspected sources, the known or expected extent of contamination, and the locations of all soil and ground water samples that have been collected at the site"*. A site map scale of no less than 1 inch = 200 feet should be selected to show this information. It is still required to provide an original of a U.S.G.S. topographic map (1:24,000) with the geographic center of the site clearly marked.

A **Site Summary** is still required, however, the intent of the Site Summary has changed to exclude the need to reiterate information provided in other sections of the new form. The **Site Summary** is now intended to allow the notifying party an opportunity to explain or add any relevant information concerning the nature of the release or other pertinent site information not requested within the form. The **Site Summary** should include a brief narrative that describes the property, the areas affected by the release and actions taken to investigate or mitigate the release.

**Tim Cash responded to an audience question** following the presentation and clarified that the distance from the edge of the area affected to the nearest sensitive receptor (i.e., residence, day care, etc. and drinking water well) should be measured from the edge of the regulated substance source area (i.e., soil stain, spill area), rather than the distal edge of the ground water plume. This may become significant if the distance to either of the required sensitive receptors (residence, etc., drinking water) would cause a change in the parameter value that would result in a favorable change in the resulting threshold score.

**Other questions from the audience** concerned the access to the area affected by the release and whether a building wall and foundation would constitute an "Inaccessible" barrier to prevent entry. Alexandra Cleary indicated that in theory it could, but she qualified her answer and stated that a complete understanding of the extent of soil contamination would need to be documented to prove it had not migrated beyond the building walls. Ms. Cleary indicated that most release investigations completed for a notification were not extensive enough to support the level of assurance EPD would be looking for to sustain an "Inaccessible" barrier designation.

**The new Release Notification Form will be required in lieu of the current form after June 1, 2000.** A copy of the new form is available on the Georgia EPD web site at [<http://www.dnr.state.ga.us/dnr/enviro>], under the heading "EPD Forms" or you can obtain the new form directly from EPD.



## New Commercial Environmental Laboratory Accreditation Rules

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- ✿ American Association for Laboratory Accreditation (A2LA)  
Telephone: (301) 644-3248  
Internet: [www.a2la.org](http://www.a2la.org)
- ✿ American Industrial Hygiene Association (AIHA)  
Telephone: (703) 849-8888  
Internet: [www.aiha.org](http://www.aiha.org)
- ✿ NSF International Inc (formerly known as the National Sanitation Foundation)  
Telephone: (800) NSF-MARK  
Internet: [www.nsf.org](http://www.nsf.org)

ISO Guide 25 (soon to be ISO Standard 17025) is the basis for accrediting laboratories.

### Stipulations

Any person submitting data to EPD prepared by a commercial analytical laboratory shall stipulate that the laboratory is approved (Chapter 391-3-26-.05). The stipulation shall include:

- ✿ Name of the accrediting agency
- ✿ Scope of accreditation relevant to the data submitted (e.g., air, drinking water, non-potable water, solid/hazardous waste)
- ✿ Accreditation number or identifier issued by the accreditation agency
- ✿ Effective (or issued) date of accreditation
- ✿ Expiration date of accreditation

Laboratory:	Georgia Testing Lab, Inc.
Accreditor:	A2LA, AIHA, NSF, NELAP Approved State agency
Accreditation ID:	GA123.01
Scope:	Non-potable water
Effective:	Apr 06 1999
Expires:	December 31, 2000

This stipulation shall be on each report or may be submitted in a separate document with the first report of the calendar year.

Your EPD permitting or compliance contact is a good place to start if you have questions about reporting requirements. For additional information on this rule and how laboratory accreditation may impact you, please contact the following Georgia Environmental Protection Division staff:

Ernest U. Earn, (404) 675-1606  
Ted V. Jackson, (404) 657-5739

## Message From The Chair

Joe Rozza, P.E.

Camp Dresser & McKee Inc.

Allow me to introduce myself. My name is Joe Rozza, the Chair of the Georgia Chapter of the Air & Waste Management Association. After serving as the Vice-Chair for the past year, I have moved into the position of Chair. My predecessor in this position, Tom St. Clair, is to be commended for his great contributions to the Chapter over the past year, which include increasing corporate sponsorship, development of the Chapter web page ([www.gaawma.org](http://www.gaawma.org)) and many others. His leadership and commitment to the Chapter are very much appreciated. Our goals for the upcoming year have been developed to continue these efforts and support our vision for the year, which is to become preeminent in the eyes of regional air quality and waste management professionals as a reliable, accurate and practical technical resource. Realizing our vision will help the Chapter sustain a strong scholarship program, and a fertile technology exchange and networking environment. We have many exciting events coming up including brown bag seminars, an industrial facility tour and our annual conference. Information about most of these events is included in this newsletter. Please work these events into your schedule and plan to attend. In closing, I want to thank you, our members, for your support of, and participation in the Chapter. Additionally, those of you that are not members, please use the information in this newsletter to become a member. I look forward to seeing you at our next function.

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The Georgia Chapter is proud to announce our new web page at [www.gaawma.org](http://www.gaawma.org). There you will find more information about the chapter, our activities and programs. Please take a look at it and provide any comments or suggestions on how to improve it to be more useful to our members.

Send your comments or questions to:

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### Mission

To promote a cleaner, safer environment in Georgia by focusing on air and waste issues. We achieve this through information transfer, technology exchange, education, and environmental leadership.

