

RISC User's Guide

Brownfields Program Chapter – new kid on the block

IDEM's proposed Risk Integrated System of Closure (RISC) policy provides a systematic approach for consistently and rationally implementing the laws and rules that govern site investigation and closure. The RISC Technical Guide and RISC User's Guide are in final draft.

Previous draft RISC User's Guide documents have only made references to brownfields redevelopment and the Brownfields Program. At the time, the program did not appear to warrant a separate chapter like other Office of Land Quality (OLQ) programs.

As IDEM's new and innovative Brownfields Program, which facilitates property redevelopment, continues to grow and coordinate activities with other OLQ programs, the need for objective, standard reporting for on-site activities has become apparent. RISC is a means to this end.

The Brownfields Program intends to follow RISC procedures for conducting its own BEAs. Once finalized, the RISC policy will be available as a tool for evaluating Brownfields Program grant and loan sites, as well as Site Status Letter and Comfort Letter properties. Although

the Brownfields Program does not have its own closure levels, sites being proposed for redevelopment should meet IDEM's investigative and remedial standards to be protective of human health and the environment.

To assist participants in addressing contamination, the

Brownfields Program often coordinates with other OLQ programs. These programs include the Voluntary Remediation Program (VRP), the Leaking Underground Storage Tank (LUST) Program, the Abandoned Tank Community Assistance Program (ATCAP), the Immediate Removals Program, the Remedial Response Program and the State Cleanup Program (SCP).

Staff believe RISC will have a positive effect on the quality of services provided by the Brownfields Program. A chapter devoted to this should facilitate program participation.

Stakeholders should find the Brownfields Program chapter, which in the future may be included in the RISC User's Guide, a necessary and helpful addition as it relates the program to RISC principles and other IDEM programs. The most recent working draft of this document is scheduled for public view in October or November 2000.



RISC finalization and implementation are scheduled for early 2001, with a one year transition period.

