



INFORMATION FOR CERTIFIED ENVIRONMENTAL MANAGERS

BUREAU OF CORRECTIVE ACTION OPERATIONS DURING PUBLIC SHUTDOWN OF STATE OFFICES MARCH 2020

As part of the State of Nevada's efforts to limit the spread of COVID-19, the Governor and the Director of the Department of Conservation and Natural Resources have decided to close State offices to the public, which includes the Nevada Division of Environmental Protection (NDEP). State employees have not been placed on leave, except under certain extenuating circumstances and will be working from home. This includes NDEP case officers in the Bureau of Corrective Actions (BCA) who are responsible for overseeing soil and groundwater cleanups under Corrective Action and Leaking Underground Storage Tank regulations. You can expect that BCA case officers will be in this work status over the next several weeks, so you may experience some reduced availability and correspondence, but they will be monitoring their emails and phone messages throughout the day.

We encourage you, as Certified Environmental Managers, to continue making progress on site assessments and cleanups that are ongoing or have approved workplans from the NDEP. Please also recognize that there are many environmental cleanup activities that do not require explicit involvement or approval by BCA case officers, which may include initial site assessments, abatement actions in response to releases, collection of data to support corrective action approaches, operation & maintenance of remedial systems, groundwater monitoring and sampling, etc. However, we recognize that you may also be experiencing work constraints as a result of COVID-19, so please prioritize your work efforts as you see fit and contact BCA case officers when deadlines and schedules during this time cannot be met.

We also understand that there are some work elements at soil and groundwater cleanup sites that require NDEP involvement. The NDEP will prioritize case oversight that is necessary to continue or begin cleanup actions at sites. This could involve the review and approval of Corrective Action Plans, remedy system optimization efforts, approving Not-to-Exceed Proposals, or obtaining explicit approval of actions that might or might not constitute abatement actions under State regulations. If you feel like you have any issue at a site that requires NDEP involvement, please reach out to your case officer by email and copy a Remediation Supervisor on the correspondence. Supervisors and case officers will be checking emails and monitoring the Spill Hotline, and they will make appropriate determinations individually or in consultation with a case officer working from home. For cases overseen by the Carson City office, include Scott Smale (ssmale@ndep.nv.gov) and Jon McRae (jmcrac@ndep.nv.gov) on correspondence asking for NDEP response; for cases overseen by the Las Vegas office, include Benjamin Moan (bmoan@ndep.nv.gov).

We sincerely hope that the efforts to reduce COVID-19 will be successful and the NDEP will be back to normal operations. Rest assured that all documents prepared and submitted to the BCA during this time will be reviewed either through case officers working from home or when schedules return to normal. If you have any questions, please consult one of the Remediation Supervisors listed in the paragraph above. Thank you for your understanding.

Here are some other items to consider during this time:

- 1) If possible, please use the online form for the Spill Hotline when reporting releases: <https://nevadaenvironmentalactivities.ndep.nv.gov/Spill/ReportForm.aspx>
- 2) E-mail will be the most consistent means of reaching the Bureau of Corrective Action staff for all programs during this time. A directory of email addresses for BCA can be found at: <https://ndep.nv.gov/contact-us/bureau-of-corrective-actions-contacts>
- 3) The NDEP and BCA main phone line will still have coverage, and staff will still occasionally be in the office, so if you must speak with somebody in person, you can phone them but you might need to wait until that staff member is in the office for your call to be returned.
- 4) If you had an in-person meeting scheduled with a BCA case officer in the next few weeks, it is likely that the meeting will need to be rescheduled or switched to a conference call. Please check with your case officer or a Remediation Supervisor.