



No Further Action Reports (NFAs) for Redevelopment

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No Further Action Reports NFAs

When were they created?

- 2010 amendments to Part 201

Who can submit?

- Liable, Non-Liable
- Not required to be submitted

When to submit?

- When remedial actions are completed

What does it cover?

- Can be for entire facility, or...
- Only for specific contaminant, area, media, exposure pathway

Benefits of a NFA

Why submit?

- Document that DEQ agrees that remedial actions are complete – liability protection per Section 201126(4)(e)
- Financial institutions may require
- Provides “closure” for a facility (or portion of) so that redevelopment becomes more feasible



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY - REMEDIATION AND REDEVELOPMENT DIVISION
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Request for DEQ Review of No Further Action (NFA) Report

This form is required for submittal of a request for the DEQ to review a No Further Action Report, under Section 20114d, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Section A: NFA Category (Check all that apply:)

- | | | | |
|---|--------------------------|---|--------------------------|
| Residential | <input type="checkbox"/> | Unrestricted | <input type="checkbox"/> |
| Non-Residential | <input type="checkbox"/> | Restricted | <input type="checkbox"/> |
| 20b(3) Site Specific or Surrogate
<i>(no generic criteria available)</i> | <input type="checkbox"/> | 20b(2) Site Specific
<i>(modification of generic criteria)</i> | <input type="checkbox"/> |

The NFA addresses the entire facility
 (entire facility as defined by Part 201, all releases, hazardous substances, and environmental media):

The NFA does not address the entire facility
Please specify the release(s), hazardous substance(s), environmental media, and/or portions of the facility addressed by the NFA.

NFA relies on a De minimus determination of GSI impact pursuant to Section 20120e(14):

Section B: Facility Information:

What should be included in a NFA Report?

Dependent on type of closure being proposed:

- Unrestricted residential
NFA report
- Restricted Residential, Non-Residential, Site Specific
 - LRUR required/no FAM required
NFA report with Post Closure Plan
 - Any other circumstance.....
LRUR/FAM/O&M/Monitoring required
NFA report with Post Closure Plan and Post Closure Agreement

Post Closure Agreements

When is it needed?

- O&M, Monitoring required
- May or may not need FAM

How to Submit?

- Submit draft PCA with the NFA

Owner Involvement Required?

- Not required, although access and institutional controls may require their consent



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Michigan Department of Environmental Quality

Questions on NFAs????

Contact:

- DEQ RRD District Office or
- Central Lansing Contact:
Kevin Schrems, 517-284-5149