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west virginia department of environmental protection

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## MEMORANDUM

**TO: Environmental Protection Advisory Council**

**FROM: Jason Wandling, General Counsel** *JW*

**SUBJECT: WVDEP's Proposed Rules for the 2020 Legislative Session**

**DATE: May 29, 2019**

This memo summarizes the rules the WVDEP proposes to introduce for consideration by the Legislature during the 2020 session. The rules themselves, in draft form, are attached for your review. The only exception to this is the proposed revision to our surface mining rule. I've attached the pertinent changes and not the hundreds of pages of the complete rule.

In the past, with some exceptions, we have submitted these rules to you and held our meeting before our deadlines for filing draft rules with the Secretary of State's office. This year, however, the deadlines are much closer than normal so I anticipate we will be filing the draft proposed rules the same week we meet. Ed and I look forward to meeting with you on June 6, 2019 at 1:30 discuss these proposals.

### I. DIVISION OF AIR QUALITY

The DAQ proposes the following rule changes for the 2020 legislative session:

**A. 45CSR8 - Ambient Air Quality Standards** – Promulgated last in the 2019 session. This rule establishes and adopts ambient air quality standards in West Virginia for sulfur oxides, particulate matter, carbon monoxide, ozone, nitrogen dioxide and lead, equivalent to the national primary and secondary ambient air quality standards established under Section 109 of the Clean Air Act and promulgated by the United States Environmental Protection Agency under 40 C.F.R. Part 50. National primary ambient air quality standards define levels of air quality which the Administrator judges are necessary, with an adequate margin of safety, to protect the public health. National secondary ambient air quality standards define levels of air quality which the Administrator judges necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. This rule also establishes and adopts ambient air monitoring reference methods and equivalent methods promulgated by the United States Environmental Protection Agency under 40 C.F.R. Part 53. Revisions to the rule include the annual incorporation

by reference of 40 CFR Parts 50 and 53 promulgated by EPA as of June 1, 2019 including: Review of the Primary National Ambient Air Quality Standards for Sulfur Oxides; Ambient Air Monitoring Reference and Equivalent Methods: Designation of One New Equivalent Method and Designation of One New Reference Method.

Review of the Primary National Ambient Air Quality Standards for Sulfur Oxides - The EPA reviewed the air quality criteria addressing human health effects and the primary national ambient air quality standard (NAAQS) for sulfur oxides (SOX), the EPA is retaining the current standard, without revision. SOX is a group of closely related gaseous compounds that include sulfur dioxide (SO<sub>2</sub>). Of these compounds, SO<sub>2</sub> (the indicator for the current standard) is the most prevalent in the atmosphere and the one for which there is a large body of scientific evidence on health effects. The current primary standard is set at a level of 75 parts per billion (ppb), as the 99th percentile of daily maximum 1-hour SO<sub>2</sub> concentrations, averaged over 3 years. The last review of the primary SO<sub>2</sub> NAAQS was completed in 2010 during which the EPA significantly strengthened the primary (health-based) and established a 1-hour standard and revoked the 24-hour and annual standards.

Ambient Air Monitoring Reference and Equivalent Methods: Designation of One New Equivalent Method - The EPA designated, under the provisions of 40 CFR Part 53, one new equivalent method for measuring concentrations of ozone (O<sub>3</sub>) in ambient air. The equivalent method is an automated method (analyzer) utilizing the measurement principle based on UV photometry. As a designated equivalent method, this method is acceptable for use by states and other air monitoring agencies.

Ambient Air Monitoring Reference and Equivalent Methods: Designation of One New Reference Method - The EPA designated, under the provisions of 40 CFR Part 53, one new reference method for measuring concentrations of nitrogen dioxide (NO<sub>2</sub>) in ambient air. The reference method for NO<sub>2</sub> is an automated method (analyzer) utilizing the measurement principle based on gas phase chemiluminescence. As a designated reference method, this method is acceptable for use by states and other air monitoring agencies.

**B. 45CSR16 - Standards of Performance for New Stationary Sources - Promulgated last in the 2019 session.** This rule incorporates by reference the federal standards of performance for new stationary sources promulgated by the United States Environmental Protection Agency (EPA) pursuant to §111(b) of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement standards of performance for new stationary sources set forth in 40 CFR Part 60. The rule also adopts associated appendices, reference methods, performance specifications and other test methods which are appended to such standards. Revisions to the rule include the annual incorporation by reference of the amendments to the New Source Performance Standards (NSPS) promulgated by the EPA under 40 CFR Part 60 as of June 1, 2019, excluding the following amendments associated with the Testing Regulations for Air Emission Sources because those Subparts are excluded from the adoption of standards under §45-16-4: Municipal Waste Combustors for Which Construction is Commenced After December 20, 1989 and on or Before September 20, 1994 (Subpart Ea) Part 60; and New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces (Subpart QQQQ) Part 60). The final rule amendments include: Petroleum Refinery Sector Amendments and Testing Regulations for Air Emission Sources. Additional information is provided below.

Petroleum Refinery Sector Amendments (40 CFR 60, Subpart Ja) - The amendments include three revisions to improve consistency, remove redundancy, and correct grammar in the

monitoring provisions for fluid catalytic cracking units, fluid cooking units and sulfur recovery plants.

Testing Regulations for Air Emission Sources - This rule amends certain existing testing regulations to reflect corrections, updates, and the addition of alternative equipment and methods for source testing of emissions. The revisions do not impose any new substantive requirements on source owners or operators. The following amendments are associated with 40 CFR 60: General

Provisions (Subpart A) of Part 60; Fossil-Fuel-Fired Steam Generators (Subpart D) Part 60; Electric Utility Steam Generating Units (Subpart Da) Part 60; Industrial-Commercial-Institutional Steam Generating Units (Subpart Db) Part 60; Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc) Part 60; Glass Manufacturing Plants (Subpart CC) Part 60; Method 2B of Appendix A-1 of Part 60; Method 5 of Appendix A-3 of Part 60; Method 5B of Appendix A-3 of Part 60; Method 5I of Appendix A-3 of Part 60; Method 7 of Appendix A-4 of Part 60; Method 8 of Appendix A-4 of Part 60; Method 18 of Appendix A-6 of Part 60; Method 22 of Appendix A-7 of Part 60; Method 26 of Appendix A-8 of Part 60; Method 26A of Appendix A-8 of Part 60; Test Method 28WHH of Appendix A-8 of Part 60; Performance Specification 1 of Appendix B of Part 60; Performance Specification 2 of Appendix B of Part 60; Performance Specification 3 of Appendix B of Part 60; Performance Specification 11 of Appendix B of Part 60; Performance Specification 15 of Appendix B of Part 60; Performance Specification 18 of Appendix B of Part 60; and Procedure 1 of Appendix F of Part 60.

**C. 45CSR25** - Control of Air Pollution from Hazardous Waste Treatment, Storage and Disposal Facilities - Promulgated last in the 2019 session. This rule incorporates by reference emission standards for the treatment, storage and disposal of hazardous waste including any reference methods, performance specifications and other test methods that have been promulgated by the EPA pursuant to the Resource Conservation and Recovery Act (RCRA), as amended. This rule codifies the general procedures and criteria to implement emission standards set forth in 40 CFR Parts 260, 261, 262, 264, 265, 266, 270 and 279. Revisions to this rule include the annual incorporation by reference updates with 33CSR20 and the annual incorporation by reference of the amendments to 40 CFR Parts 260, 261, 262, 264, 265, 266, 270 and 279 promulgated by EPA as of June 1, 2019 and listed in Table 45-25 of this rule. The amendments included in the annual IBR include the following revisions to 40 CFR Part 261:

§ 261.4 Exclusions [84 Fed. Reg. 5938, Feb. 22, 2019] - Revised paragraph (a)(1)(ii) regarding materials that are not solid wastes as follows:

Any mixture of domestic sewage and other wastes that passes through a sewer system to a publicly-owned treatment works for treatment, except as prohibited by § 266.505 and Clean Water Act requirements at 40 CFR 403.5(b). "Domestic sewage" means untreated sanitary wastes that pass through a sewer system.

§ 261.7 Residues of hazardous waste in empty containers [84 Fed. Reg. 5939, Feb. 22, 2019] - Added paragraph (c) that reads:

Containers of hazardous waste pharmaceuticals are subject to §266.507 for determining when they are considered empty, in lieu of this section, except as provided by §266.507(c) and (d).

**D. 45CSR34 - Emission Standards for Hazardous Air Pollutants - Promulgated last in the 2019 session.** The rule incorporates by reference the National Emission Standards for Hazardous Air Pollutants of 40 CFR Parts 61 and 63 and 40 CFR Part 65 to the extent referenced in 40 CFR Parts 61 and 63, promulgated as of June 1, 2019. The rule adopts associated appendices, reference methods, performance specifications and other test methods which are appended to these standards and contained under 40 CFR Parts 61 and 63. This rule also codifies general procedures and criteria to implement emission standards for stationary sources that emit, or have the potential to emit, one or more of the hazardous air pollutants set forth in § 112 (b) of the CAA, or one or more of the eight substances listed as hazardous air pollutants under 40 CFR § 61.01(a). Revisions to the rule include the annual incorporation by reference amendments of the NESHAPs promulgated by the EPA under 40 CFR Part 63 as of June 1, 2019, including: Manufacture of Amino/Phenolic Resins Risk and Technology Review Reconsideration; Friction Materials Manufacturing Facilities Residual Risk and Technology Review; Leather Finishing Operations Residual Risk and Technology Review; Testing Regulations for Air Emission Sources; Revisions to Testing Regulations for Air Emission Sources; Wet-Formed Fiberglass Mat Production Residual Risk and Technology Review; Surface Coating of Wood Building Products Residual Risk and Technology Review; Surface Coating of Large Appliances; Printing, Coating, and Dyeing of Fabrics and Other Textiles; and Surface Coating of Metal Furniture Residual Risk and Technology Reviews; Portland Cement Manufacturing Industry Residual Risk and Technology Review; Portland Cement Manufacturing Industry Residual Risk and Technology Review Correction; Petroleum Refinery Sector Amendments; and Remaining Requirements for Mercury and Air Toxics Standards (MATS) Electronic Reporting Requirements. Additional information is provided below.

Manufacture of Amino/Phenolic Resins Risk and Technology Review Reconsideration (40 CFR 63, Subpart OOO)- Amendments were finalized for two reconsideration issues: (1) the maximum achievable control technology (MACT) standard for continuous process vents (CPV) at existing affected sources; (2) the planned routine maintenance of emission control systems used to reduce HAP emissions from storage vessels. For clarification, five minor technical rule corrections were made. The revised back-end CPV standard for existing sources is 8.6 lbs of HAP/ton of resin produced. The standard for front-end reactor CPVs is 0.61 lb of HAP/hr. The standard for front-end non-reactor CPVs is 0.022 lbs of HAP/hr. The work practice standards address emissions during periods of storage vessel emissions control system planned routine maintenance. The standards require that storage vessels not be filled during these times, which eliminates working losses, and limit the amount of time allowed annually for this work practice. EPA estimates there will be a reduction in HAP emissions as a result of these amendments.

Friction Materials Manufacturing Facilities Residual Risk and Technology Review (40 CFR 63, Subpart QQQQQ) - The EPA eliminated the startup, shutdown, and malfunction (SSM) exemption in this rule. The amendments also include revisions to the reporting requirements for deviations by requiring facilities to now report the date, time, a list of affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, a description of the method used to estimate the emissions, and the corrective action taken. There are no amendments as a result of the residual risk and technology review. EPA indicates that the amendments are environmentally neutral.

Leather Finishing Operations Residual Risk and Technology Review (40 CFR 63, Subpart TTTT) - The EPA eliminated two General Provisions that included rule language providing an exemption for periods of SSM and eliminated language that treated periods of startup and shutdown the same as periods of malfunction. The EPA also revised the Deviation Notification Report and related records as they relate to malfunctions. The amendments also include the

addition of electronic reporting of performance test data, and clarification to certain monitoring, recordkeeping, and reporting requirements for control devices and the provisions for alternative schedules. There are no amendments as a result of the residual risk and technology review. This rule does not require compliance with more stringent emission limits or require additional controls.

Testing Regulations for Air Emission Sources - This rule amends certain existing testing regulations to reflect corrections, updates, and the addition of alternative equipment and methods for source testing of emissions. The revisions do not impose any new substantive requirements on source owners or operators. The following amendments are associated with 40 CFR 63: General Provisions (Subpart A); Wool Fiberglass Manufacturing (Subpart NNN), Industrial, Commercial, and Institutional Boilers and Process Heaters (Subpart DDDDD), Coal and Oil-Fired Electric Utility Steam Generating Units (Subpart UUUUU), Method 303 of Appendix A or Part 63, Method 308 of Appendix A of Part 63, Method 320 of Appendix A of Part 63, Method 323 of Appendix A of Part 63, Method 325A of Appendix A of Part 63, and Method 325B of Appendix A of Part 63.

Revisions to Testing Regulations for Air Emission Sources - Correction to Appendix A to Part 63 (Method 323 - Measurement of Formaldehyde Emissions From Natural Gas-Fired Stationary Sources - Acetyl Acetone Derivatization Method.) A typo was corrected.

Wet-Formed Fiberglass Mat Production Residual Risk and Technology Review (40 CFR 63, Subpart HHHH)- The amendments remove, and revise provisions related to SSM and established standards that apply at all times. Amendments also include revisions to monitoring, recordkeeping and reporting requirements to submit performance test results electronically, submittal of compliance reports semiannually when deviations occur and removal of parametric monitoring requirements during periods when a non-HAP binder is used. EPA also made some technical and editorial changes. There are no amendments as a result of the residual risk and technology review. EPA does not anticipate any air quality impacts as a result of these amendments.

Surface Coating of Wood Building Products Residual Risk and Technology Review (40 CFR 63, Subpart QQQQ) - The amendments eliminated the SSM exemption and established standards that apply at all times. Other amendments included an alternative compliance calculation equation that relies on periodic emissions testing; electronic submittal of notifications of compliance status, semiannual compliance reports, and performance test reports; a new EPA test method for isocyanates, EPA Method 326, IBR of several test methods, and various technical and editorial changes. There are no amendments as a result of the residual risk and technology review. The EPA anticipates a reduction in emissions by requiring facilities to meet the applicable standard during SSM periods.

Surface Coating of Large Appliances; Printing, Coating, and Dyeing of Fabrics and Other Textiles; and Surface Coating of Metal Furniture Residual Risk and Technology Reviews (40 CFR 63, Subparts NNNN, OOOO, and RRRR) - The EPA eliminated the SSM exemptions; added a requirement for electronic submittal for performance tests results and compliance reports; added an option to conduct EPA Method 18 of Appendix A to 40 CFR Part 60; updated several measurement methods; and added a requirement for periodic performance testing of capture and control devices every 5 years. Additionally, there are several miscellaneous technical amendments. The EPA did not make revisions to the numerical emission limits based on the residual risk and technology reviews.

Portland Cement Manufacturing Industry Residual Risk and Technology Review (40 CFR 63, Subpart LLL) - The amendments clarify monitoring, testing, recordkeeping, and reporting requirements and the correction of typographical errors. There are no amendments as a result of the residual risk and technology review.

Portland Cement Manufacturing Industry Residual Risk and Technology Review (40 CFR 63, Subpart LLL) - Correction to Table 1 to Subpart LLL of Part 63 - Applicability of General Provisions.

Petroleum Refinery Sector Amendments (Referred to as Refinery MACT 1 and Refinery MACT 2, 40 CFR 63, Subparts CC and UUU) - The amendments in this rule are in response to reconsideration petitions received by EPA following promulgation of the final rule. A definition was added for “pressure relief device” (PRD) and the following definitions were revised: “flare purge gas”, “flare supplemental gas”, “reference control technology for storage vessels” and “relief valve”. The compliance date for existing maintenance vent standards was changed from August 1, 2017 to December 26, 2018 that apply during periods of SSM or inspection. The compliance date for delayed coking units that use the water overflow alternative compliance option and needed to install additional equipment to comply was extended from January 30, 2019 to November 26, 2020.

Remaining Requirements for Mercury and Air Toxics Standards (MATS) Electronic Reporting Requirements (40 CFR 63, Subpart UUUUU) - The EPA extended the period during which certain electronic reports required by the MATS may be submitted as portable document format (PDF) files using the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool. The end date period was extended from June 30, 2018, to July 1, 2020 because the electronic reporting system required after PDF filing is no longer allowed will not be available by June 30, 2018. The extension does not alter the responsibility of owners or operators of affected MATS sources to comply with the applicable MATS and report their compliance information to the appropriate authority.

**E. 45CSR40 - Control of Ozone Season Nitrogen Oxides Emissions - Promulgated last in the 2016 session.** This rule establishes: (a) Nitrogen oxides (NOX) ozone season emission limitation, monitoring, recordkeeping, reporting, excess emissions, and NOX budget demonstration requirements for large industrial boilers and combustion turbines that have a maximum design heat input greater than 250 mmBTU/hr, in accordance with 40 CFR §51.121; (b) NOX ozone season emission reduction, compliance plan, monitoring, recordkeeping and reporting requirements for affected stationary internal combustion engines; and (c) NOX ozone season control standards, compliance plan, monitoring, recordkeeping, and reporting requirements for applicable cement manufacturing kilns. Revisions to the rule include: (1) replacing the “former rules” subsection 1.5 with “sunset provision”; (2) revising the definition of “continuous emissions monitoring system” or “CEMS” and “Monitoring system” in subsections 2.6 and 2.15 to reflect changes made in section 6; (3) adding definitions for “nitrogen oxides”, “Performance Specification 2”, “Performance Specification 16” and “Predictive Emission Monitoring System” in section 2; (4) adding numbering for acronyms in section 3 and adding the following acronyms - “CEMS”, “CASPR”, “NOX”, “O2”, and “PEMS”; (5) revising subsection 4.1 to reference the current CSAPR federal regulations under 40 CFR Part 97, Subpart EEEEE; the corresponding state rule 45CSR43; and revised SIP revision section as 40 CFR §52.38(b)(9); (6) revising the monitoring, recordkeeping, and reporting requirements in section 6 to reflect federal amendments to the Emissions Monitoring Provisions in State Implementation Plans Required Under the NOX

SIP Call [84 Fed. Reg. 8422, March 8, 2019]; (7) changing section 11 to reflect conflicts with other DAQ rules and not other DEP rules; and (8) miscellaneous revisions for readability.

## II. DIVISION OF MINING AND RECLAMATION

DMR proposes the following rule changes for the 2020 legislative session:

**A. 38CSR2-16.2.c.2** - Last year's Legislature passed SB 635, which amended §22-3-14 by adding subsection (e) which states "The secretary shall promulgate for review and consideration by the West Virginia Legislature during the regular session of the Legislature, 2020, revisions to legislative rules (38 CSR 2) pertaining to surface owner protection from material damage due to subsidence under this article. The secretary shall specifically consider adoption of the federal standards codified at 30 C.F.R. § 817.121."

DMR, in compliance with SB 635, completed a review of the federal standards codified at 30 C.F.R. § 817.121 and has elected to not adopt the federal standards wholesale. Instead, DMR proposes only to clarify that the WVDEP does not adjudicate property disputes between operators and surface owners by modifying 38-2-16.2.c.2 to read as follows:

16.2.c.2. Either correct material damage resulting from subsidence caused to any structures or facilities by repairing the damage or compensate the owner of such structures or facilities in the full amount of the diminution in value resulting from the subsidence. Repair of damage includes rehabilitation, restoration, or replacement of damaged structures or facilities. Compensation may be accomplished by the purchase prior to mining of a non-cancelable premium-prepaid insurance policy. The requirements of this paragraph only apply to subsidence related damage caused by underground mining activities conducted after October 24, 1992; Provided, however, 16.2.c.2 does not create additional property rights nor may it be construed as vesting in the secretary the jurisdiction to adjudicate property rights disputes. and

**B. 38CSR2F-3.1** – The 2019 Legislature passed OSB 635, which also amended §22-30-14 by adding subsection (g) which states " The secretary shall promulgate for review and consideration by the West Virginia Legislature in the regular session of the Legislature, 2020, legislative rules to incorporate the relevant provisions of this article in the Groundwater Protection Rules for Coal Mining, 38 CSR 2F, for tanks and devices located at coal mining operations." Therefore, WVDEP is proposing to incorporate the relevant provisions of §22-30 by making the following changes to 38-2F-3.1:

3.1. Hydrologic and water quality protection practices established under the authority of W. Va. Code §22-11 or W. Va. Code §22-3 or W. Va. Code §22-30 and the legislative rules promulgated thereunder, were enacted in part to protect groundwater and are hereby incorporated by reference into this rule.

The effect of this rule change will be to bring regulation of aboveground storage tanks into the ambit of the DMR, which will help avoid duplicative regulatory efforts and give our mining inspectors more authority to require corrections to aboveground storage tanks that they see on the mines for which they are responsible.

### III. DIVISION OF WATER AND WASTE MANAGEMENT

DMR proposes the following rule change for the 2020 legislative session:

**33CSR20** - Hazardous Waste Management System - This rule regulates the generation, treatment, storage, and disposal of hazardous waste to the extent necessary for the protection of the public health and safety and the environment. The rule adopts and incorporates by reference the federal regulations set forth in 40 CFR Parts 260 through 279 that are in effect as of August 21, 2019. Federal rule amendments that are adopted by this rule are as follows:

- Revisions to the Definition of Solid Waste, 80 FR 1694-1814 (January 13, 2015); 83 FR 24664-24671 (May 20, 2018);
- Imports and Exports of Hazardous Waste, 82 FR 41015-41016 (August 29, 2017);
- Confidentiality Determinations for Hazardous Waste Export and Import Documents, 82 FR 60894-60901 (December 26, 2017);
- User Fee Electronic Manifest 2018, 83 FR 420-462 (January 3, 2018);
- Safe Management of Recalled Airbags 2018, 83 FR 61553-61563 (November 30, 2018); and
- Management Standards for Hazardous Waste Pharmaceuticals and Amendments to the P075 Listing for Nicotine, 84 FR 5816-5950 (August 21, 2019).

### IV. OFFICE OF ENVIRONMENTAL REMEDIATION

OER proposes the following rule change for the 2020 legislative session:

**60CSR3** – Voluntary Remediation and Redevelopment - The majority of proposed amendments are to the Risk Protocol and Remediation Standards sections of the rule. The amendments to Risk Protocol were made to clarify and update the requirements related to performing risk assessments to better reflect the current standard of practice. Additionally, language was added to clarify that presumptive remedies could be considered in the exposure assessment to eliminate the need to perform a site-specific risk assessment.

Amendments to the Remediation Standards section of the rule also clarify the use of presumptive remedies in the exposure assessment and introduce the use of a Conceptual Site Model to evaluate the potential for exposure to contaminants. The most significant revision to this section is to remove the De Minimis Migration to Groundwater Standard (which was considered a De Minimis Soil Standard) and to relocate the process for evaluating the potential for soil contaminants to migrate to groundwater to the guidance manual. The amendments also added the term Vapor Inhalation Pathway to the rule, explained that this pathway is not considered in the De Minimis Soil Standards or De Minimis Groundwater Standards, and stated that it must be evaluated using procedures in the guidance document.

A number of amendments are proposed to the Licensed Remediation Specialist Program. The Voluntary Remediation and Redevelopment Act (W. Va. Code § 22-22) requires the use of a Licensed Remediation Specialist for supervision of all remediations completed through the Voluntary Remediation Program to ensure that the safety, health, and welfare of the public are protected. These rule amendments strengthen the program by requiring evidence of degrees earned

to meet minimum education requirements; establishing a passing score for the Licensed Remediation Specialist examination; and defining appropriate and acceptable continuing education, including mandatory training specific to the program.

In addition, the amendments propose increasing fees associated with the Licensed Remediation Specialist Program, which are listed in Table 60-3A. The application fee is being increased from \$300 to \$500; the biennial renewal fee is being increased from \$200 to \$400; and the examination fee is being increased from \$250 to \$500. These fees have not been increased since the original filing of the Voluntary Remediation and Redevelopment Rule in 1997, and current fees do not adequately cover program costs.

Other amendments, including narrowing the acceptable accuracy of site coordinates and clarifying standard language in the Land Use Covenant template, improve the long-term monitoring of sites remediated with Land Use Covenants and ensure that these sites remain protective of human health and the environment in perpetuity. Additionally, grammatical changes were made to clarify language after issues were brought to the agency's attention during a January 2018 Voluntary Remediation Program Stakeholders Survey and supplemental March 2018 Voluntary Remediation Program Stakeholders Feedback Meeting.