

## Natural Attenuation Monitoring (NAM) Report Checklist

Site Manager: \_\_\_\_\_

NAM Plan Date: \_\_\_\_\_ Purchase Order #: \_\_\_\_\_

FACILITY INFORMATION	
<b>Facility ID Number:</b> <i>(9 digit)</i>	
<b>Facility Name:</b>	
<b>Location:</b>	
<b>Special Circumstances:</b>	

**REVIEW:**

REPORTS:	
	Did report include site SAR/active remediation/PARM highlights, including dates of any source removals and/or other active remediation (e.g., system start-up and shutdown dates, injection dates, etc.)?
	Did report include NAM Plan Summary, including Action Levels, timeframe to achieve applicable NFA/closure criteria as presented in NAM Plan, and anticipated reductions of contaminant concentrations in monitoring wells?
	Have the applicable NFA/closure criteria for the site/discharge (RMO I, II, or III) been met?
	If applicable closure criteria not met, did report include confirmation the current site conditions continue to meet <b>all</b> applicable NAM criteria {Chapter 62-780.690(1)(a)-(f) F.A.C.}? Per Chapter 62-780.700(1), if the conditions of the site do not satisfy applicable NFA/closure criteria or NAM criteria, a Remedial Action Plan shall be prepared/submitted, unless other course of action approved by the Department. For reference, see the NAM Plan Checklist, NAM Criteria for Level 1 and Level 2, as applicable.
	Did report include comparison of data to Action Levels?
	If Action Level(s) exceeded, did the report include a recommended course of action (e.g., modification to NAM Plan or other) and signing and sealing by an appropriate registered professional? {See Chapter 62-780.690(8)(e)}
	Were the analytical data evaluated in reference to the expected reductions in contaminant concentrations in monitoring wells to verify progress of site rehabilitation by natural attenuation?
	Did report include confirmation of, or updated, estimate of timeframe to achieve applicable NFA/closure criteria? Has estimated timeframe for achieving applicable NFA/closure criteria decreased, increased, or stayed the same?
	If rate of anticipated cleanup progress not achieved or timeframe for achieving applicable NFA/closure criteria is increasing, did the report include a recommended course of action (e.g., modification to NAM Plan, start/return to active remediation, or other) and signing and sealing by an appropriate registered professional? {See Chapter 62-780.690(8)(f)}
	If NAM Plan includes NAM parameters, does the report provide an evaluation of the analytical results with respect to parameter ranges and progress of natural attenuation?

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	If groundwater impacts have expanded, is Initial Notice of Contamination and/or revision to or new TPOC required and indicated in report?
	If trending analysis performed, does trending include at least four (4) monitoring events? Is technical justification provided for any available data not used in trending analysis?
	If report recommends start/return to active remediation, have NAM parameters been monitored and results evaluated?
	Was any data in report or correspondences misrepresented? {See also CPE Section 3-a}
	Was electronic data deliverable submitted?
	Were wells purged, stabilized, and sampled in accordance with current FDEP SOPs?
	Are laboratory analytical results valid – analyzed via correct methods and within applicable holding times?
	Except when otherwise approved, was groundwater monitoring performed a minimum of 90 days after previous monitoring event?
	Is there potential correlation between water table elevation fluctuations and contaminant concentrations over time (potential smear zone)? If yes, is this impacting rate of natural attenuation?
	Is current direction of groundwater flow consistent with historical flow, and if changed, is current downgradient direction being monitored?
	Do any changes in the delineation of impacts require additional noticing (e.g., INOC or TPOC)?
	Is there dewatering or construction related activities in the site’s immediate vicinity (less than ¼ mile) that may trigger plume migration?
	<b>Annual (minimum)</b> - Signed/sealed report included confirmation statement that site is anticipated to meet the applicable No Further Action criteria of Rule 62-780.680, F.A.C., as a result of natural attenuation.
	<b>Annual (minimum)</b> - Were backup calculations/analyses provided for estimate of timeframe to achieve applicable NFA/closure criteria (i.e., verification of progress)?
	<b>Annual</b> - Was brief summary included for monitoring events during 12-month period?
	<b>As applicable (42 months of monitoring)</b> - Has significant reduction been achieved after 42 months (3.5 years) of monitoring? If not, does applicable report include recommended course of action and signing and sealing by an appropriate registered professional?

### CONTRACTORS PERFORMANCE EVALUATION (CPE):

**Note: The ATC may not be penalized in more than one section/item of the CPE for the same error/issue.**

	Was report submitted 1 day to >3 weeks after due date in task assignment, purchase order or request for change (RFC)? {CPE Section 1-a}
	Was there failure to adequately respond to comments or were requests for information not received by specified due dates? {CPE Section 1-c}

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	If Action Level(s) exceeded, or if anticipated cleanup progress not achieved, if applicable, was a request for change submitted timely to professionally certify the report to communicate needed project changes? {CPE Section 4-a}
	Were potential cost-saving changes to the NAM Plan recommended or missed? {CPE Section 5-a}
	Are any conclusions incorrect or proposed changes to NAM Plan missing data required for evaluating progress of NAM and/or achievement of applicable closure criteria? {CPE Section 6-b}
	Did contractor diligently pursue achieving applicable NFA/closure criteria? Were evaluations of the progress of NAM and recommended actions (e.g. return to active remediation, or changes to NAM Plan) timely? {CPE Section 6-c or 6-e (a NAM Plan is analogous to a RAP)}