



Department of Natural Resources and Environmental Control
Division of Waste and Hazardous Substances
Remediation Section
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DNREC Remediation Section's Policy Regarding the Submittal of Brownfield Investigation (BFI)/Remedial Investigation (RI) Report and Feasibility Study (FS)/Focused Feasibility Study (FFS) Report

Effective Date: September 3, 2026

Signature , Program Administrator,
DNREC WHS Remediation Section

1. Purpose

This policy is designed to streamline the review and approval process for Brownfield Investigation/Remedial Investigation (BFI/RI) and Feasibility Study (FS)/Focus Feasibility Study (FFS) reports. By separating the BFI/RI report and the FS/FFS report as individual documents, the Department of Natural Resources and Environmental Controls – Remediation Section (DNREC-RS) aims to ensure that the site characterization is reviewed and approved before the evaluation of remedial alternatives under FS/FFS. However, there are some intermediate steps as described below that can be taken by communicating with DNREC-RS to expedite the process as outlined in this policy.

2. Policy Requirements

Effective **September 3, 2026**, the following reporting protocols apply to all newly submitted BFI/RI and FS/FFS reports:

- **Standalone Submissions:** The BFI/RI report will no longer include the FS/FFS report as a combined document.
- **Sequential Reporting:** The FS/FFS report must be submitted as a **standalone document** only after the DNREC-RS has officially approved the corresponding BFI/RI report.

- **Compliance:** All submissions after the effective date must adhere to this structure unless specific written approval is granted by DNREC-RS due to unique site-specific circumstances.
- **Screening Results Review:** Immediately following the receipt of screening results, the consultant and DNREC-RS will review the findings to select representative samples for confirmatory analysis at a HSCA approved laboratory.
 - This collaborative discussion ensures that laboratory resources are targeted toward the most critical data points for investigation and risk assessment identified during the screening phase.
- **Data Summary and Data Gap Analysis:** Throughout the investigation process, anytime qualitative, semi-quantitative, and quantitative results are generated, the results should be systematically reviewed in order to identify data usability issues and/or data gaps.
 - The HSCA-approved consultants will submit tables summarizing the analytical results and maps illustrating the spatial distribution of the samples to DNREC-RS.
 - This interim review allows for a collaborative determination of whether the site and/or the release has been characterized and whether additional mobilizations may be required to fill the data gaps in the characterization of the site and/or release.
- **Remedial Alternative Proposal Narrative:** A short narrative outlining the remedial alternatives under consideration must be submitted to DNREC-RS for review and comment before proceeding with the detailed FS/FFS.
 - This document may be submitted 30 days after submittal of the BFI/RI Report and should provide a brief description of each alternative and its specific applicability to the site and/or release, rather than a comprehensive evaluation of options.
 - Please note that if there are a number of data usability issues or data gaps identified during the review of the BFI/RI, DNREC-RS may not review the remedial alternative narrative.

3. Reporting Templates and Contents

To expedite the review process, DNREC-RS has developed a standardized **BFI/RI Template and FS/FFS Template (linked to this policy)**. The only distinction between a FS and FFS is that an FFS requires only three (3) remedial alternatives to be evaluated, of which one alternative includes No Action. Please see the FS/FFS Guidance for more information.

- **Use:** HSCA-certified Consultants representing the Brownfield Developer or the Responsible Party should follow the provided template to ensure that, at minimum, the following data is documented.
 - Deviation from this template requires pre-approval by DNREC-RS.
 - Please note, that there may be Site-specific complexities that will require additional data and the template should be considered as a minimum requirement for DNREC-RS review.
- **Applicability:** If a specific section of the template is not applicable to the site in question, the consultant must explicitly state "Not Applicable" within that section rather than omitting it.
 - For consistency of reporting all figures, tables and other documents should be included at the end of the report under the Tables, Figures, and Appendices sections and not in the body of the report.
- **Site-Specific Additions:** While the template covers the minimal requirements, consultants should include additional site-specific items as necessary or required by the complexity of the site and/or the release in order to provide a comprehensive documentation of the BFI/RI and FS/FFS for the site.

4. Future Updates

As needed, DNREC-RS will notify consultants, responsible parties and developers in advance of any future modifications to this policy or updates to the templates.

The templates are located in the DNREC-RS webpage at the following link
<https://dnrec.delaware.gov/waste-hazardous/remediation/laws-regs-guidance/>

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