

Ground Water Remedial Action Permit Application Screening Checklist

✓ Completed (or put N/A)	Post-No Further Action cases This universe of cases is reflected in data miner as “PFR Post NFA Monitoring” Activities
	1. If applying for a for an initial Ground Water Remedial Action Permit (RAP) on a case that received a No Further Action (NFA) determination, provide all the items listed below:
	<p>a. Complete and provide the most current Ground Water RAP Application form found at www.nj.gov/dep/srp/srra/forms/.</p> <p>Make sure all fields are completed and all applicable certifications signed. If there is pertinent information that is important to the case but not required on the application, please include in the information within the cover letter.</p>
	b. A copy of the NFA letter(s).
	c. A copy of the Remedial Action Report (RAR) that the NFA letter was based on.
	d. All historical and recent ground water data.
	e. A Ground Water Monitoring Plan (GWMP) that assesses the effectiveness of the remedial action and includes the sampling of source, plume fringe, and sentinel wells for contaminants of concern (COCs). The GWMP must include a downgradient sentinel well, that will remain clean for the life of the permit even if it was not required when the NFA was approved.
	f. A completed Ground Water Remedial Protectiveness / Biennial Certification Form found at www.nj.gov/dep/srp/srra/forms/ .
	g. A check for the appropriate fees. Refer to the most recent version of the Post-No Further Action Compliance Notice available at www.nj.gov/dep/srp/enforcement/compliance.htm .

✓ Completed (or put N/A)	LSR cases This universe of cases is reflected in data miner as “LSR” Activities
	<p>1. Complete and provide the most current Ground Water Remedial Action Permit (RAP) Application form found at www.nj.gov/dep/srp/srra/forms/.</p> <p>Make sure all fields are completed and all applicable certifications signed. If there is pertinent information that is important to the case but not required on the application, please include in the information within the cover letter. For RAP Modifications, provide the reason for the modification in the cover letter. For all RAP Applications (including RAP Modifications and Transfer/Change of Ownership RAPs) please provide electronic copies of the application and attachments.</p>
	2. Include a check for the appropriate Ground Water RAP Application fee. In addition, make sure all other outstanding fees are paid (i.e., RAP annual fee, LSR fees, etc.). A fee schedule can be found at www.nj.gov/dep/srp/fees/

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	3. Submit an RAR which demonstrates the effectiveness of the ground water remedial action to be monitored under the Ground Water RAP. The RAR must be submitted prior to the Ground Water RAP Application and through the Department’s online portal at www.nj.gov/dep/online/
	4. Complete and provide the most current Classification Exception Area/Well Restriction Area (CEA/WRA) Fact Sheet Form at www.nj.gov/dep/srp/srra/forms/ . Make sure all fields are completed and required attachments included.
	5. Provide a Ground Water Monitoring Plan (GWMP) that assesses the effectiveness of the remedial action and includes the sampling of source, plume fringe, and sentinel wells for contaminants of concern (COCs). The GWMP must include a downgradient sentinel well, that will remain clean for the life of the permit.
	6. If a subsurface depressurization system (SSDS) or point of entry treatment (POET) system is operating at the site, provide an Operation Maintenance and Monitoring Plan in addition to the GWMP. Use the Immediate Environmental Concern (IEC) Monitoring and Maintenance Checklist found in the forms library under the IEC Response Action Form at www.nj.gov/dep/srp/srra/forms/ .
	7. If Financial Assurance (FA) is required for an active treatment permit or for a Monitored Natural Attenuation RAP with an SSDS/POETS, or any other engineering control, provide the original FA document and a completed Remediation Cost Review/RFS-FA Form found at www.nj.gov/dep/srp/srra/forms/ . For a Remediation Trust Fund, a copy of the trust agreement is sufficient.
	8. Submit a GIS compatible map of the CEA shape to srpgis_cea@dep.nj.gov .

Ground Water Remedial Action Permit (GW RAP) Application – Helpful Hints

Property Owner Signature: The New Jersey Department of Environmental Protection (Department) prefers that the signature of the current property owner be obtained on the GW RAP Application. However, if there are mitigating circumstances so that obtaining the signature of the current property owner is not possible, then the Department will allow the person applying for the GW RAP to provide proof to the Department (as part of the GW RAP Application) that the current property owner has received a complete copy of the GW RAP Application prior to, or simultaneously with, submission of the GW RAP Application to the Department. Such proof could include, but is not limited to, a copy of the cover letter that accompanied the completed GW RAP Application that was sent to the current property owner. However, please be advised that the property owner’s signature is always required if the owner will be designated “Primary Responsibility for Permit Compliance.”

Remedial Action Report (RAR):

- Submission of the RAR is now required through the online service and should be submitted **prior to** submitting the GW RAP Application.
- The RAR should demonstrate that the ground water plume is horizontally and vertically delineated to the Ground Water Quality Standards (GWQS). Please be advised that “modeling” of the ground water plume is **not acceptable** at the Remedial Action stage of the case; as indicated in Section VI of the Department’s June 2013 Policy Statement (available at www.nj.gov/dep/srp/timeframe/policy_statement.pdf), the delineation must be completed through actual collection of ground water samples.
- The RAR should either demonstrate that monitored natural attenuation (MNA) is an effective remedial action for the site (8 consecutive quarterly rounds of ground water samples have been collected **after the active remediation is completed** and a decreasing trend of contaminant concentrations established) or that the active ground water remedial action/treatment system is operating as designed (minimum of 4 consecutive quarterly rounds of ground water samples should have been collected to demonstrate this).

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- The RAR should provide a detailed discussion of how all potential receptors were addressed in the area (i.e., potable and irrigation wells, Tier 1 Well Head Protection Area, vapor intrusion, ecological receptors).
- The RAR should include all historical and recent ground water data collected at the site.
- Include a Preliminary Assessment/Site Investigation (PA/SI) when there is a claim that there is off-site contamination migrating on to the property.

Classification Exception Area/Well Restriction Area (CEA/WRA) Fact Sheet Form:

- This form should always be included with a GW RAP Application even when a CEA is already established and there are no changes. The only exception to this requirement is when the GW RAP Application is for a modification of an existing permit for a change of address for a co-permittee.
- List all the Block(s)/Lot(s) for the Property(ies) covered by the CEA and ensure they are correct.
- List each COC detected in ground water that exceeds its GWQS. Make sure to include any COCs where the MDL exceeds the GWQS and any COCs that exceed the practical quantitation level (PQL) or background in the Pinelands.
- Include a reasonable/logical/calculated CEA duration (i.e., less than 30 years unless for metals). Indeterminate CEAs for Volatile Organic Compounds are not acceptable for Monitored Natural Attenuation (MNA) GW RAPs.
- Two rounds of clean ground water data that account for seasonal fluctuation are required to terminate the Ground Water RAP and remove the CEA; these data can be submitted at any time.

Ground Water Monitoring Plan (GWMP):

- A clean sentinel well(s) should be located downgradient of the source area and included in the GWMP.
- The monitoring frequency, and number and location of monitoring wells should be adequate so that the GWMP addresses all potential receptors in the area. Please see the recommended monitoring frequency in *Monitored Natural Attenuation Technical Guidance* document as it relates to GW RAPs.
- Make sure the easting and northing of each monitoring well on the GWMP are correct.

Notes:

- Please notify the Department as soon as possible should something change on an already submitted GW RAP Application (i.e., permittee's contact information) that has yet to have a GW RAP issued. Once the GW RAP is issued, then any change requested is a modification and a fee will be required.
- Please be advised that a GW RAP is not required for the establishment of a CEA at the site during the Remedial Investigation (RI) Stage; establishing a CEA can be accomplished with the submission of a CEA/WRA Fact Sheet Form with the Remedial Investigation Report (RIR) for the site. Any GW RAP Application submitted during the RI stage should be withdrawn by the LSRP/RP or rejected as incomplete by the Department, and all permit fees will apply for resubmission of the GW RAP Application in the future, if applicable.