

Preliminary Assessment Technical Guidance Change Log

List of significant changes from Version 1.2 (October 2015) to Version 1.3 (March 2018)

1. **Cover page:** Changed date to March 2018 and version to 1.3
2. **Section 1.1 Purpose:** Added paragraph 3 to clarify all preliminary assessments are fully historic not limited to just current operations. Also added paragraph 4 as a reminder to understand the regulatory requirements of the Technical Regulation to ensure all required parts of the preliminary assessment report are complete.
3. **Section 2.0 Preliminary Assessment Data Gathering:** First paragraph, the third and 4th sentence were reworded slightly. The meaning and intent has not changed.
4. **Section 2.1 General Information:** At the end of the first paragraph added the words “and prior or current SRP case numbers”,
5. **Section 2.5.2 Information for the Report:** The following language was added at the end of the second to last paragraph “or the subject site is or may have discharged to an off-site property.” This was added to clarify if a discharge has migrated off the site under investigation the off-site discharge is an area that requires investigation and remediation.
6. **At the end of Section 2.6.2; 2.10.2; 2.11.2 and other places** throughout the document the suggestion to check the appropriate box on the Preliminary Assessment Data Gathering Checklist has been removed. Using the checklist is not a requirement but simply a useful tool to ensure the data gathering is complete.
7. **Section 2.7.1:** The words “or storage areas” was added to the first sentence of the third paragraph regarding historic farming and mixing and storage areas for pesticides.
8. **Section 2.7.2:** The words “are present or were historically present” have been underlined to emphasize the importance of a complete list of hazardous material known or suspected to have been used on site. The words “for all owners/operators” was added at the end of the paragraph to again emphasize a preliminary assessment includes a complete history of a site and is not limited to the current owner and operator.
9. **Section 2.9.1:** At the end of the first sentence of the first paragraph which ended with “from industrial process activities” the following language was added “that drain to a holding tank, underground storage tank or other storage vessel for storage, treatment or disposal”. The purpose of adding this language was to clarify the intended difference between section 2.9 Process Waste Streams and section 2.8 Wastewater Discharge History. The last sentence of the paragraph has also been reworded to add to the clarification of this section.
10. **Section 2.10.1:** [Changed the contact information for Bureau of Environmental Radiation \(1/25/2019\)](#)
11. **Section 2.12.1:** At the end of section 2.12.1 reference to the Department’s DataMiner and US-EPA Envirofacts as an important resource has been added.
12. **Section 2.13.1:** At the end of section 2.13.1 reference to the Department’s DataMiner as an important resource has been added.
13. **Section 2.14.1:** This has been re-worded to clarify backfill material used on older remedial efforts may be a concern if the source is questionable or unknown and sampling may be necessary.

Reference to guidance documents pertaining to historic fill and fill material have been added since these guidance documents were finalized after the preliminary assessment guidance was last revised and should be consulted if either type of fill is confirmed or suspected to exist on the site under investigation.

14. **Section 2.15.1:** Sentences were added to the end of section 2.15.1 suggesting aerial photographs are a source to help identify some landfill areas and that the Landfill Technical Guidance should be consulted if a landfill is confirmed or suspected to be on site.
15. **Section 2.16.1:** A reference to the Department's DataMiner has been added to the end of section 2.16.1 to help identify past remedial efforts at a site. The suggestion to conduct a file review of any identified cases was also added.
16. **Section 2.18.1:** The requirements of section 2.18.1 have not been changed. The wording of the text was rewritten to better convey the requirements of the Technical Regulations at N.J.A.C. 7:26E-3.2(a)5.
17. **Section 2.19.1:** Language was added to the end of section 2.19.1 to confirm an area of concern as defined in the Technical Regulations includes any area where hazardous materials or hazardous substances were stored treated etc. and it not limited to contaminated areas of concern and that all areas of concern should be listed on the Case Inventory Document.
18. **Section 3.1 Preliminary Assessment Report Requirements:** At the end of the first bullet item regarding scaled site plans, language was added listing the type of active and inactive wells commonly found on sites in New Jersey that should be listed on the site plan.
19. **Appendix A section A.1.2:** In the paragraph numbered 2, language was added that the LSRP currently or formerly involved with the site should also be targeted for interview to obtain information about the site under investigation.
20. **Appendix A section A.1.2:** The following sentence was added to the end of the 8th paragraph "When there is limited information regarding historical operations or areas of concern, the PA should recommend SI sampling including greater frequency and a larger parameter list."
21. **Appendix A section A.1.3:** The second sentence of section A.1.3 fill Material and Historic Fill was reworded for clarification purposes only.
22. **Appendix A section A.1.4:** Language was added to the end of section A.1.4 suggesting the investigator confirm any identified regulated underground storage tanks are properly registered
23. **Appendix A section A.1.6.4:** This section was re-written to clarify loading areas and spill areas along active and inactive rail lines should be identified as separate areas of concern and investigated for the suspected spilled material regardless of the status of the rail line being active or inactive.

The intent of the original guidance and the RAO Rail line insert that resulted from the discussions regarding rail lines in general, was not to blanketly exempt all activities along a rail line or spur from investigation. Many older cases pre SRRA ended up remediating fill material used to construct the rail line or spur simply because the fill was sampled and confirmed to be contaminated. Once a discharge is confirmed it needs to be addressed. Like the presumption that historic fill is contaminated, the consensus is, aside from loading areas that may pose a separate concern related to site operations, rail lines will be contaminated. Only spill areas or loading areas on active lines should be targeted for further investigation. Sampling of spill areas, loading areas and the fill along

the rail line is necessary for inactive lines and former lines to confirm the area does or does not require remediation.

24. **Appendix A section A.1.8:** Changed the reference to the Historically Applied Pesticide Technical Guidance which was posted on the DEP Webpage since the last version of the Preliminary Assessment Guidance was posted.
25. **Appendix A section A.2.1:** Added section A.2.1 NJDEP DataMiner and GeoWeb in its entirety. Both resources are readily available, free of charge and should automatically be used as a resource when completing the data gathering for the completion of a preliminary assessment.
26. **Appendix B:** Added new items 17 and 18 to the data gathering checklist and renumbered the remaining tasks on the checklist to correct the numbering sequence.