

## **Helpful Hints for LSRP Submittals Bureau of Remedial Action Permitting**

The following guidelines have been developed to assist the person responsible for conducting remediation in ensuring their Remedial Action Permit application is complete prior to submission. These guidelines apply to most cases but are not all-inclusive. Licensed Site Remediation Professionals (LSRPs) must apply their independent professional judgement when varying from rules and/or deviating from guidance and provide a technical and scientific justification.

Missing or incorrect information will require the Department to contact the LSRP to obtain the information. If the information cannot be provided and the Department is unable to confirm the protectiveness of the proposal, it may be required that the application be withdrawn by the LSRP or it may be deemed incomplete by the Department. These scenarios result in a delay in the Remedial Action Permit being issued, which also prevents the LSRP from issuing the Response Action Outcome.

### **All Ground Water Remedial Action Permit Applications**

1. Ensure that both horizontal and vertical delineation of ground water contamination are completed pursuant to N.J.A.C. 7:26E-4.3(a) prior to submitting Ground Water Remedial Action Permit Application.
  - a. The June 2014 policy statement allows for modeling and/or projections of “clean zones,” during the remedial investigation (RI) so that the RI can be considered complete. The policy statement further states that sampling data that indicate attainment of the applicable remediation standards must be submitted prior to the issuance of the Response Action Outcome. The June 2014 Policy statement can be found at: [www.nj.gov/dep/srp/srra/training/matrix/important\\_messages/June2014\\_revised\\_ri\\_complete\\_policy\\_statement.pdf](http://www.nj.gov/dep/srp/srra/training/matrix/important_messages/June2014_revised_ri_complete_policy_statement.pdf).
  - b. Horizontal delineation is required in all directions, including upgradient.
  - c. Vertical delineation is required for all contaminants, not just those with a specific gravity greater than 1.
2. Ensure that vertical delineation is completed in the source area/immediately downgradient of the source area in accordance with the Ground Water SI/RI/RA Technical Guidance Document.
3. When injecting treatment(s) into the ground water, ensure that the treatment is remediating ground water effectively prior to submitting a Ground Water Remedial Action Permit application.

## **Ground Water Remedial Action Permit Applications - Monitored Natural Attenuation (MNA)**

1. Include information documenting source identification/removal/control (see Section 4.1 of the Monitored Natural Attenuation Technical Guidance document).
2. Ensure that the concentrations of ground water contaminants are not indicative of:
  - a. free or residual product or
  - b. remaining source material.
3. Ensure there is a sufficient number of rounds of ground water monitoring data collected AFTER completion of all active ground water remedial actions to evaluate the effectiveness of MNA.

Section 6.1 of the Monitored Natural Attenuation Technical Guidance document states that a minimum of eight rounds of ground water monitoring data should be used to demonstrate the applicability of MNA. Historic site investigation or remedial investigation data may be used to comprise the total of eight rounds, if these data do not reflect pre-remediation conditions. Of these eight rounds, four consecutive quarterly ground water monitoring events are necessary to evaluate spatial and temporal distribution.

4. Provide documentation demonstrating that the ground water contaminant plume is either shrinking or stable (see Section of 6.1 of the Monitored Natural Attenuation Technical Guidance document):
  - a. A shrinking plume is demonstrated with concentration trends and the areal extent of the plume both decreasing over time.
  - b. A stable plume is demonstrated when the concentration trends remain the same over time, the areal configuration of the plume remains the same over time, and the contaminant concentrations in the sentinel well remain below the ground water remediation standards throughout the evaluation timeframe.
  - c. Determining that a plume is stable may require a more thorough evaluation of the secondary and possibly tertiary lines of evidence.

## **Ground Water Remedial Action Permit Applications - Active Systems**

1. Do not submit an Active Ground Water Remedial Action Permit Application with a passive treatment such as sorbents in the wells to address intermittent product.