

Remedial Action Permit Update

Remediation Review Element:
Bureau of Remedial Action Permitting

September 2, 2020

Remedial Action Permit Listservs

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Disclaimer

The following information is related to general concepts only.
Contact information provided for discussion of site-specific scenarios.

September 2, 2020 Listservs

- ▶ **Active System Ground Water Remedial Action Permits**

https://www.nj.gov/dep/srp/srra/listserv_archives/2020/20200902_srra.html

- ▶ **Free and Residual Product and Remedial Action Permits**

https://www.nj.gov/dep/srp/srra/listserv_archives/2020/202009_02_srra.html

September 2, 2020
Listservs to assist LSRPs in submitting
acceptable documents

Regulatory Basis

When free product returns to a well:

- ▶ Socks/pads, HIT/EFR events, and/or manual recovery are acceptable as an IRM, but not as a long-term remedy for an Active RAP
- ▶ Free and residual product exist in the vicinity of the well and must be identified and delineated
- ▶ The long-term remedy under an Active RAP can't only address free product within the well, it must also address free and residual product along with any remaining sources in the vicinity of that well.

**N.J.A.C. 7:26E-4.2, N.J.A.C. 7:26E-4.3,
N.J.A.C. 7:26E-5.1(e)**

Helpful Advice

Where free product remains:

- ▶ Perform additional investigation/remediation
- ▶ Clean monitoring well(s)
- ▶ Investigate and/or monitor the areas between monitoring wells
- ▶ Present maps and cross-sections
- ▶ Investigate the area within the effective radius of influence of any prior active remediation

Free and Residual Product and Remedial Action Permits

- ▶ *This information, as well as any other information that has been collected, can be used to support the LSRP's independent professional judgment that a source of free product no longer remains.*

Effectiveness of Updated Remedial Action Permit Forms

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Effectiveness of Updated Remedial Action Permit Forms

	<u>January 2019 to June 2019</u>	<u>April 2020 to September 2020</u>
Permits Issued	342	330
NTDs	201	176
Withdrawals	60	37
Incompletes	12	4

Next Steps

- ▶ Stakeholder group recommends further training
- ▶ Soil Permit guidance being revised
- ▶ Bi-Cert Forms are being revised
- ▶ MNA guidance is being revised
- ▶ Ground Water Permit Guidance will be revised