



New Jersey Department of Environmental Protection Site Remediation Program

Diffuse Anthropogenic Pollution (DAP) Administrative Guidance

What is DAP?

The term Diffuse Anthropogenic Pollution (DAP) describes broadly distributed pollutants present in surficial soil, often arising from multiple sources, which have been historically generated by human activities. DAP generally results from atmospheric deposition, but may also be from random, non-attributable, non-point sources.

The Department defines DAP as follows:

“Diffuse anthropogenic pollution” or “DAP” means contamination from broadly distributed contaminants, often arising from multiple sources. DAP generally arises from atmospheric deposition, but may also contain contributions from random, non-attributable, non-point sources.

DAP contaminants typically include polynuclear aromatic hydrocarbons (PAHs) and, in some cases, metals, which may be present above health-based soil remediation standards. DAP is usually limited to the upper six inches of soil or less. DAP is usually identified when a person is in the process of interpreting analytical results for a construction or remediation project. This review of soil analytical data may indicate the presence of contaminants that are not associated with any AOC or any contaminant concentration gradient from a potential discharge or be related to industrial activities at the site. These contaminants are most likely to be associated with DAP.

The Brownfield and Contaminated Site Remediation Act (Brownfield Act) at N.J.S.A. 58:10B-12 provides that the property owner or person responsible for conducting remediation is not responsible for remediating contamination from offsite sources. This provision applies to the remediation of DAP because DAP results from offsite sources. However, contaminants present in DAP still may represent a public health or ecological risk. Therefore, the person responsible for conducting remediation may choose to document the presence of DAP in the Response Action Outcome (RAO) for the site.

Documenting the presence of DAP

The Licensed Site Remediation Professional should document the finding of DAP in remedial phase reports and the RAO letter, for the subject site by using the following RAO notice:

Soil contamination from an off-site source – Diffuse Anthropogenic Pollution

“Please be advised that contamination in the soil at this site exists above the Department’s applicable soil Remediation Standards, N.J.A.C. 7:26D-4. Based on an evaluation of data and the Department’s “Diffuse Anthropogenic Pollution (DAP) Guidance,” it has been determined that surficial contamination that was identified during the evaluation of the site is consistent with DAP. This impact to soils at the site was not required to be reported to the Department’s Hotline and therefore no incident number was generated. Development or redevelopment on this site should take into consideration the potential for direct contact soil exposure to contaminants in soil caused by DAP.”

This and other RAO notices are available on the Department’s web site at <http://www.nj.gov/dep/srp/guidance/#rao>.

Calls to the DEP Hotline

No call to the hotline to report the presence of DAP is necessary because DAP does not meet the criteria found in the Administrative Requirements for the Remediation of Contaminated Sites rules (ARRCS) at of

N.J.A.C. 7:26C-1.7(b). This requirement applies to the person that is required to conduct remediation. A person that identifies DAP on a site is not required to remediate it; therefore, they do not meet the definition of the “person responsible for conducting remediation.”

In addition, a call to the Department Hotline is required when contamination that has been caused by a discharge that is not already known to the Department. Based on the nature of DAP and the Department’s knowledge that DAP is ubiquitous in the State, its presence does not meet the criteria of contamination not already known to the Department.