Panel: Soil Remedial Action Permits

Topics

1. **Permit foibles:**
   - Common mistakes when completing a permit, what to do when there is a cap disturbance, and what the permit writers will look for in the RAR

2. **Timing of the Deed Notice:**
   - Confusion because the CEA is filed before the Deed Notice

3. **Recommendations:**
   - When property owners won’t sign the Deed Notice

4. **Notices in Lieu of Deed Notice**
Panel: Discharge to GW Permit Applications

**Topic #1**

A. DGW Permit Applications
   - Proposed Sampling Parameters do not match DGW conditions
   - Insufficient down gradient monitoring
   - Missing Public Notice Requirements
   - Applications lacking detail/unclear proposals

B. NJDEP Comment Inconsistencies
   - NJDEP comments standardized (Improving)

**Resolution**

- Technical Guidance: *Performance Monitoring of In-situ Ground Water Remedial Actions*
- Revision of June 2007 NJPDES DGW Technical Manual for the SRP
- Update of the CEA Guidance
Panel: Discharge to GW Permit Applications

**Topic #2**

*Timeframes for Issuance/Modification Approvals*

- NJDEP Backlog (Improved)
- Modification Approvals with Limitations (via E-mail)

**Resolution**

- Stakeholder familiarity with the process
- Aforementioned Guidance Manuals
- Ability to Issue Expedited Permits (Not Routine)

**Topic #3**

*Presumptive/Fast Track Approvals (PBR, General Permits, LSRP Approval)*

**Resolution**

- NJPDES Regulation (N.J.A.C. 7:14A ) Modifications
Topic #1
“Are RAPs a 2nd Bite of the Apple for DEP?”

- LSRPs issue all other key documents (RIR, RAW, RAR, RAO); the Department issues the RAP;
- N.J.A.C. 7:26C-7.1(a)ii The purpose of RAPs are to monitor the effectives of the remedial actions

Resolution
- Training
- RAP Guidance Docs being updated
- Checklists
Panel: GW Remedial Action Permits

**Topic #2**

“How to handle Old CEA’s” or Post NFA CEA’s vs LSR CEAs

- DEP Comments: We try to “honor” Conditional NFA’s that were issued, must be protective.
- Need to update information, data, compare to today’s Standards
- LSRP is now Certifying the past remedial actions conducted prior to the NFA are acceptable.

**Resolution:**

- Training
- Suggestions?

**Topic #3**

- Items presented in the “Checklist & Helpful Hints”