



CVP/SRAG Meeting

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Direct Oversight Q & A

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NJDEP Site Remediation and Waste Management Program





Direct Oversight (DO) Question #1

- For a Spill site, 99 of 100 AOCs have RAOs, how is DO applied to the 1 outstanding AOC?
 - Answer: DO only applies to the one outstanding AOC. AOC RAOs for unrestricted use are done. AOC RAOs for restricted use or limited restricted use continue to be remediated under remedial action permits with financial assurance; as applicable.





Direct Oversight (DO) Question #2

- Same scenario as #1 but for an ISRA trigger - 99 of 100 AOCs have RAOs, how is DO applied to the 1 outstanding AOC?
 - Answer - Same outcome as #1. DO only applies to the one outstanding AOC. EXCEPT: An ENTIRE SITE RAO cannot be issued to close the ISRA Case until the last AOC is done.





Direct Oversight (DO) Question #3

- How do I obtain an “Earned” Adjusted Direct Oversight ACO?
(see Adjusted Direct Oversight Handout)
- Contact Bureau of Enforcement and Investigation Duty Officer at (609)633-1480
- Retain LSRP, Submit Public Participation Plan and Cost Estimate (**Earn 1st Adjustment**) – ACO will allow posting any RFS (except self-guarantee), sign ACO and agree to pay a penalty and remain in compliance with an ACO.



Direct Oversight (DO) Question #3 (continued)

- Submit RI report by ACO schedule (**Earn 2nd Adjustment**). Proceed without preapproval, No Feasibility Study Required, RP makes RA decision and document review continues under LSRP Program, etc.
- **Note:** Compliance with previously issued enforcement documents, etc. will be evaluated before allowing Adjusted DO ACOs.





Direct Oversight (DO) Question #4

- If a site is under DO and a new discharge is identified, is this new discharge/AOC automatically placed under DO?
 - Spill Case – Second discharge can be tracked separately upon request. If tracked separately, 2 annual remediation fees apply and separate key documents are required.
 - Note: Once tracked separately, these cases can't be combined again.





Direct Oversight (DO) Question #4 (continued)

- ISRA/ACO Cases – If the new discharge is related to or should have been associated with the scope of the initial case (i.e. entire site), the new discharge can't be tracked separately.
- UST Cases – Same as above but if the new discharge is related to the same UST AOC, the new discharge can't be tracked separately

