

Remedial Action Permit

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Documentation of Professional Judgement

- What it is: “documentation of the factors considered and how those factors influenced decisions or actions” and “a discussion of all the information identified and evaluated.”
- What it is not: A statement that you used professional judgement.



Things to remember

- Permit writer will have no previous knowledge of your site
- Permit writer does not have copies of previous submittals – unless submitted through the portal
- Permit writer does not know what is going on at neighboring properties



What we would like to see

- Detailed information
- Multiple lines of evidence
- Copies of previous submittals or sections of submittals if it is relevant to your conclusion

A complete story of how you reached your conclusion



New location on website

Remedial Action Permit Forms	Download	Version & Date	Since Last Version	Rule
<p>► Ground Water Monitoring Plan Spreadsheet You may have to reset your macros security in Excel before it will open/work properly. To reset: In a blank spreadsheet, go to TOOLS, MACROS, SECURITY. Set to MEDIUM. After that, open the spreadsheet, and select the button that says - Enable Macros.</p>	<p>Spreadsheet xls 177 Kb</p>	<p>1.0 - 5/22/2012</p>		
<p>► Model Deed Notice (Appendix B for the ARRCs Rule)</p>	<p>Model Document doc 108 Kb</p>	<p>5/8/2018</p>	<p>See Update Log</p>	<p>7:26C-7.2</p>
<p>► Model Termination of Deed Notice (Appendix C for the ARRCs Rule)</p>	<p>Model Document doc 98 Kb</p>	<p>5/8/2018</p>	<p>See Update Log</p>	<p>7:26C-7.13</p>
<p>► Remedial Action Permit Initial Application - Ground Water</p>	<p>Form pdf 447 Kb</p>	<p>Instructions pdf 281 Kb</p>	<p>1.0 - 5/30/2019</p>	<p>See Update Log</p>
<p>► Remedial Action Permit Modification Application - Ground Water</p>	<p>Form pdf 444 Kb</p>	<p>Instructions pdf 284 Kb</p>	<p>1.0 - 5/30/2019</p>	<p>See Update Log</p>
<p>► Remedial Action Permit Termination Application - Ground Water</p>	<p>Form pdf 285 Kb</p>	<p>Instructions pdf 209 Kb</p>	<p>1.0 - 5/30/2019</p>	<p>See Update Log</p>

New Forms

- Initial Soil
- Modification Soil
- Termination Soil
- Deed Notice Termination
- Initial Ground Water
- Modification Ground Water
- Termination Ground Water
- Transfer/Change of Property Ownership
- Contact Information Change



LSRP Retention

- DEP considers the LSRP that submits the RAP Application to be the LSRP retained for this RAP after the RAO is issued.
- If the LSRP is dismissed or dismisses him/herself for the RAP, the LSRP shall submit the LSRP Notification of Retention or Dismissal Form online and the permittee needs to retain another LSRP within 45 days.
- If a new LSRP is not retained within 45 days then the permittees will be deemed out of compliance and subject to potential enforcement actions.



LSRP Retention

“DEP considers the LSRP that submits the RAP Application to be the LSRP retained for this RAP after the RAO is issued. If the LSRP is dismissed or dismisses him/herself for the RAP any time after the issuance of the RAO, the LSRP shall submit the Licensed Site Remediation Professional Notification of Retention or Dismissal Form online and the permittee shall retain another LSRP within 45 days. A permittee that fails to retain a new LSRP within 45 days will be deemed out of compliance and subject to potential enforcement actions.”



Note

- All permit applications will not be processed until all past RAP annual fees have been paid in full
and
- All previously required RAP Transfer/Change of Property Ownership and Modification Applications have been reported



Vertical and Horizontal Delineation

- Vertical delineation is to be completed by the Remedial Action phase, regardless of what contaminants of concern are present.
- When monitoring wells are installed for the purpose of vertical delineation, they should be located in the source area or immediately downgradient of the source area
- N.J.A.C. 7:26E-4.3(a)4., “The PRCR shall conduct a remedial investigation of contaminated ground water by delineating the horizontal and vertical extent of ground water contamination to the ground water remediation standard.”



Questions?

