

EO Deadlines, May 2022 Deadlines, and the Extension Process

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May 2022 MTF Deadline and Extension Process for Cases Requiring a Permit

- *How should we proceed with extension requests for RARs/GWRAPs that have been submitted but are awaiting review?*
 - All extension requests can be submitted on the Remedial Timeframe Notification form to BCAIN via the srp_submissions@dep.nj.gov email. A paper copy is not required unless requested by the Department.
- *Can we submit an Extension Request for 1 year to allow time for NJDEP review?*
 - A 6-month extension request can be submitted for the universe of cases where 5/6/2022 is the Mandatory Timeframe and a permit is required. The period of the extension will be equal to the actual duration of the delay in issuing the permit for technically and administratively complete applications or submittals (RAP Application/RAR).
- *When should the Mandatory Requests be filed and in what format?*
 - Extension Requests to the MTF for cases requiring a permit should be submitted after the submission of the RAR and Permit application. All MTF extensions must be submitted on the Remedial Timeframe Notification Form at least 60 days prior to the MTF (5/6/2022) but no sooner than 6 months.

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- ▶ A 6-month extension request can be submitted for the universe of cases where 5/6/2022 is the Mandatory Timeframe and a permit is required. The period of the extension will be equal to the actual duration of the delay in issuing the permit for technically and administratively complete applications or submittals (RAP Application/RAR). My question is how does this address the timing for issuance of the RAO, which I understand is the final remediation document to fulfill remediation complete by the deadline (or extension thereof). Once a RAP is approved by the Department, it may take the LSRP more time to issue the RAO, and how does the factored into the schedule?
 - ▶ An additional 30 days will be added to the extension to allow for the filling of the RAO with the Department.

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- ▶ 2022 RA extensions...show examples of adequately documented reasons vs inadequately documented reasons

- ▶ Inadequate Example

Justification for Extension

1. Describe the cause or causes of the need for additional time to complete the work:

Requesting an extension to the Remedial Investigation deadline detailed in the ACO due to the typical issues encountered while attempting to gain offsite access and in consideration of the difficulties of conducting remedial work during the Covid-19 pandemic.

2. Describe in detail the steps taken to minimize the additional time needed to complete the work:

(For any site where access is a cause of the need for additional time to complete the work, detail the steps taken to obtain access)

3. Additional information:

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- ▶ 2022 RA extensions...show examples of adequately documented reasons vs inadequately documented reasons

- ▶ Adequate Example

Justification for Extension

1. Describe the cause or causes of the need for additional time to complete the work:

As agreed upon during a recent Technical Consultation on December 8, 2021, the PRCR is requesting the extension based on a need to complete post-injection monitoring to confirm natural attenuation

2. Describe in detail the steps taken to minimize the additional time needed to complete the work:

(For any site where access is a cause of the need for additional time to complete the work, detail the steps taken to obtain access)

The PRCR accelerated the last round of in-situ injection of BOS 200 reagent to reduce contaminant mass in groundwater in order to attain groundwater quality standards faster.

3. Additional information:

There have been 3 in-situ treatments since the original establishment of natural attenuation at the time when Remedial investigation Report was submitted. The in-situ injections significantly reduced contaminant concentrations in groundwater.

Questions?