

Ecological Evaluation Reviews

Discussion with Eco Risk Assessors on Process and Pitfalls

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Request for Eco Risk Assessment Workgroup

- ▶ Potential workgroup members to include LSRPs and Ecological Risk Assessors
 - ▶ LSRPs who have taken the Rutgers two-day Ecological Risk Assessment course would be in a better position to facilitate discussions
 - ▶ Risk Assessors from consulting and industry
 - ▶ NJDEP CSRR Ecological Risk Assessors
- ▶ Objectives for the workgroup
 - ▶ Discuss common errors observed in both EE and ERA
 - ▶ Discuss what issues cause the most time consumption for reviewers
 - ▶ Discuss what changes LSRPs/Ecological Risk Assessors can implement
 - ▶ Develop a FAQ document to be posted on CSRR website

Ecological Evaluations and Ecological Risk Assessments

- ▶ The EE and ERA is a lengthy and complex process.
 - ▶ This is due to the nature of the study having to look at all receptors (invertebrates, small mammals, avian, plants) for both terrestrial and aquatic environments present on or potentially under the influence of a site, as well as the need to potentially evaluate soil, sediment, surface water, and groundwater (each with different evaluation criteria).
 - ▶ Analogy of ERA vs. SRS and Human Health Risk Assessments

Ecological Evaluations and Ecological Risk Assessments

- ▶ The NJDEP recently updated the Ecological Evaluation Technical Guidance
 - ▶ The Ecological Evaluation Technical Guidance (NJDEP 2023) was developed and revised with input from the stakeholder committee, which includes KariAnne Czajkowski (Roux) and Charles Harman (Wood).
 - ▶ The latest update was only to Section 9.1 to clarify the need for remedial action permits in ESNRs in accordance with SRRA requirements.
- ▶ When work is conducted within the parameters of the tech rules and guidance, EEs and ERAs can be approved.
 - ▶ Work is often conducted, but not included in the reports.

Ecological Evaluations

- ▶ Length of review times for eco assessments
 - ▶ Peer Review Process previously covered
- ▶ NJDEP offers a 2-day course each Spring on ecological evaluation (EE) and ecological risk assessment (ERA) through the Rutgers Continuing Education Program. The first day is taught by Charles Harman (EETG Committee member) and the second day is taught by NJDEP Personnel.
 - ▶ Annual Rutgers ERA training ongoing for 25+ years.
- ▶ Technical Consultations
 - ▶ ARSs developed following a technical consultation are generally approved without comment (issued three letters in last few weeks)
 - ▶ Technical consultations when physical limitations make full delineation of contamination difficult
 - ▶ Develop plan of action to address complex issues

Ecological Evaluations and Ecological Risk Assessments

- ▶ Are there a list of pitfalls to avoid or best practices to implement that can help PRCRs and LSRPs with eco assessments?
 - ▶ List of EE and ERA typical issues are too numerous to list here and are better given in a Word document to be discussed in the proposed workgroup; however, a select few are listed here.
 - ▶ Using human health-based soil remediation standards instead of applying the appropriate ecological screening criteria (ESC) to environmentally sensitive natural resources (ESNRs).
 - ▶ Not identifying and investigating all potential current and historical contaminant migration pathways from source areas ESNRs, e.g., locations of historical outfalls.
 - ▶ Relying on former/old BEE or EE reports, or NFA Letters. Former reports are often not even in the possession of the LSRP and have not been reviewed to determine if they meet current regulations and guidance as per SRRA requirements (N.J.S.A. 58:10C-16).

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Questions?