

SRPL BOARD BULLETIN

KEEPING LSRPs INFORMED

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Let's Talk About NJAC 7:26I-2.3(c)2

also known as the “You Must Be Retained” Rule

Here's the big takeaway: Before you start remediation work, you must submit a Notification of Retention. No shortcuts.

[Click here to read the recent Board decision. It's a clear reminder of why this rule is important.](#)

What Happened?

- The site had a Classification Exception Area (CEA) dating back to 2001.
- Ownership changed.
- The new owner hired an LSRP (the “Retained LSRP”).
- Later, monitoring wells showed LNAPL at the site which was attributed to the former owner.
- The former owner hired a different LSRP (the “Subject LSRP”) to delineate the LNAPL.
- The Subject LSRP started remediation work without submitting a [Notification of Retention](#)

That's where the trouble began. NJDEP filed a complaint against the Subject LSRP because he performed remediation without official retention.

The Defense Said: The Subject LSRP argued: “I was working under the supervision of the Retained LSRP.” But the Retained LSRP denied that he was supervising the Subject LSRP:

- There was **no direct communication** (no calls, meetings, emails).
- The Retained LSRP's attempts to reach the Subject LSRP went unanswered.
- Workplans were exchanged through attorneys—not directly.

Not exactly a picture of active supervision.

The Board Said: Before you begin remediation: Submit a Notification of Retention. If you don't submit one because another LSRP is already retained and will supervise the work, then:

- Both LSRPs must clearly agree to that relationship.

- There must be **direct communication** (calls, meetings, emails).
- The retained LSRP must **actively acknowledge and approve** the remediation work.
- The LSRPs should document all communications.

When it comes to retention and supervision, don't leave room for doubt.

N.J.A.C. 7:26I-2.3 License required to perform remediation

(c) Except as provided at subsection d. of section 30 at P.L. 2009, c. 60 (N.J.S.A. 58:10B-1.3), an LSRP shall not:

2. Manage, supervise, perform, engage, or participate in remediation, unless:

- i. The LSRP has been retained by a person responsible for conducting the remediation, and the Department has been notified of the retention; or
- ii. The remediation is being managed, supervised, or performed by another LSRP retained by the person responsible for conducting the remediation, and the Department has been notified of the retention of the other LSRP.

Board Member Spotlight: Lawra J. Dodge, PG, LSRP

Lawra J. Dodge, PG, LSRP is founder and President of Excel Environmental Resources, an environmental consulting firm specializing in Brownfields investigation, remedial action, and contaminated property redevelopment. Excel represents private developers and corporations as well as the public sector, including municipalities, counties, and non-profits, and is celebrating 32 years in business. She is a licensed Professional Geologist (PG) and a Licensed Site Remediation Professional (LSRP) with 40 years of experience. She brings technical and regulatory expertise and a pragmatic perspective as a consultant and advisor to a wide range of stakeholders in the environmental industry.



[Click Here to read Lawra Dodge's full career biography.](#)

Lawra Dodge is an original member of the NJ Site Remediation Professional Licensing Board appointed in November 2010 and has served as the Chairperson of the Continuing Education and By-Laws Committees as well as the Ad Hoc Committee on the use of Artificial Intelligence by LSRPs. She is also a member of the Outreach Committee.

Outside of the Board and her environmental consulting firm, Lawra has three wonderful children who are now young adults pursuing their own individual careers. Since 2012, she has owned and operated a family farm in beautiful Readington Township, Hunterdon County where she raises cattle, chickens, and

other livestock. She is an avid skier and travels the northeast as well as out west to ski as often as possible!

Lawra is passionate about serving on the SRPL Board because she views the work of the Board as establishing the framework for future generations of LSRPs. The environmental industry in NJ is constantly evolving so the work of the Board must evolve as well. Her personal message to LSRPs is to try to get to know the work of the Board and the Board members by attending Board meetings and visiting the Board website to review the work of the various committees to familiarize yourself with what the Board is all about. We are here not just to ensure that LSRPs are conducting their work in a manner that is protective of human health, safety, and the environment but also to establish a fair and consistent framework for the LSRP program and provide guidance and insight for the LSRPs in our great state.

The Next New Jersey LSRP Licensing Exam is scheduled for Wednesday, October 14, 2026



Mark Your Calendar!

The Board has engaged The Caviart Group to develop the next LSRP Licensing Exam which will be offered on **Wednesday, October 14, 2026**.

The Board encourages experienced professionals to consider serving as Subject Matter Experts to help craft exam questions. Your knowledge and insight can make a real impact on the next generation of LSRPs!

[Click here to email the Board to share your interest in being a SME](#)

The Board will accept applications for the LSRP license **June 15, 2026 - July 31, 2026**. The license application is available on the Board website.

[Click here to access the LSRP License Application, instructions and more information](#)

All applicants must complete the Case Study Training class (2019-098) no more than 36 months prior to the date of submission of the application. The Case Study Training class will be held on **July 14-15, 2026**.

[Click here to access more information about the LSRP Case Study Training: The Next Generation – Rutgers NJAES Office of Continuing Professional Education](#)

Calling All LSRPs !

Has something interesting, unusual, unexpected or amusing happened to you in the field? Have you taken a photo of an interesting or awesome sight you came across – remediation related or otherwise?

We'd love to include your contributions in an upcoming newsletter.

If you have any ideas for articles for upcoming newsletters we'd love to hear those too!

Thank You for Your Continued Dedicated Service as an LSRP of New Jersey.

Contaminated Site Remediation & Redevelopment Training Updates

Contaminated Site Remediation and Redevelopment has completed training on recent regulatory revisions to the *Technical Requirements for Site Remediation* (N.J.A.C. 7:26E) and the *Administrative Requirements for the Remediation of Contaminated Sites* (N.J.A.C. 7:26C). These updates were adopted in accordance with revisions to the *Site Remediation Reform Act* (N.J.S.A. 58:10C).

If you were unable to attend the training in person, recordings and additional training resources are available on the NJDEP website at:

[NJDEP| Contaminated Site Remediation & Redevelopment Program | Training](#)

A link to the updated Model Deed Notice is also available here: [Model Deed Notice](#)

[Click here to email anything you'd like to share with the Board.](#)
