

Site Remediation Reform Act (SRRA) Listserv Archives

September 10, 2014 - [SRRA]: New inspection/review process for documents submitted by LSRPs

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The New Jersey Department of Environmental Protection (Department) is announcing changes to the inspection and review process. As the LSRP program matures, LSRPs are completing an increasing number of site cleanups, which translates into a greater number of submittals to the Department. With limited Department resources, processing times within the Department will increase unless the Department adjusts its inspection and review process. This adjustment will continue to ensure that remediations will continue to proceed in a sound manner that is protective of public health and safety and of the environment.

The LSRP program has been operating for four years. During this time, LSRPs and the Department have learned how to navigate through the current remediation program. This is an opportunity to apply what has been learned to the Department's inspection and review process and achieve a greater efficiency of operation.

The Department is required by statute to inspect all documents submitted by LSRPs. Staff in the Bureau of Inspection and Review (BIR) will continue to inspect all documents in a timely fashion, and inspectors will continue to identify items that may require additional review. However, the Department recognizes that reviews of non-RAO phase submissions as they come in are not always necessary or an efficient use of Department personnel. Rather, the review of many documents is best conducted once an RAO is submitted. Postponing the review enables the Department to consider all the work performed by the LSRP on a case. Items that triggered a potential review early in the remediation may be resolved once the remediation is complete. Therefore, with some exceptions, reviews of non-RAO documents will be deferred until an RAO is submitted.

The most important exception to the deferral of reviews regards receptors. The Department's commitment to protecting receptors remains a high priority. Department inspectors will examine receptor issues for every submission to confirm that sensitive populations are protected. RPs and LSRPs should expect swift feedback from the Department when there is any question concerning the safety of the public and the state's natural resources. Additionally, items that require pre-approval and permit applications will continue to be processed by the appropriate bureau when they are received.

It is anticipated that Department inspectors and reviewers will contact LSRPs less frequently prior to the submission of an RAO under this revised process. If Department assistance is needed during the remediation of a site, RPs and LSRPs are encouraged to utilize the Department's technical consultation process. Technical consultations are available regarding ground water contamination, impact to ground water (IGW), soil contamination, remedial action permits, and laboratory analysis and QA/QC issues. For additional information on the technical consultation process, please see https://www.nj.gov/dep/srp/srra/technical_consultation/.

SRP Site Remediation Reform Act (SRRA) Web site: <https://www.nj.gov/dep/srp/>