

Site Remediation Reform Act (SRRA) Listserv Archives

November 28, 2018 - [SRRA]: Correction to Technical Requirements for Site Remediation, N.J.A.C. 7:26E, Table 2-1, Footnote 3

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Subject [SRRA]: Correction to Technical Requirements for Site Remediation, N.J.A.C. 7:26E, Table 2-1, Footnote 3

[SRRA]: Correction to Technical Requirements for Site Remediation, N.J.A.C. 7:26E, Table 2-1, Footnote 3

The DEP has been made aware that there is an inconsistency with respect to how Tentatively Identified Compounds (TICs) associated with semivolatile analyses are to be reported as cited in the Technical Requirements for Site Remediation (Technical Requirements), N.J.A.C. 7:26E-2.1 Table 2-1, Footnote 3 versus the Heating Oil Tank System Remediation Rules (HOTSr), N.J.A.C. 7:26F-2.2 Table 2-1, Footnote 4. It is the DEP's intent to have the two footnotes read the same. The phrase "that are not alkanes unless otherwise specified by analytical protocol" should not have been included in the Technical Requirements Table 2-1, Footnote 3.

As such, when a laboratory is requested to detect and report TICs from a semivolatile analysis, the laboratory is only required to identify up to 15 organic compounds of greatest concentration which are not surrogates, internal standards, or targeted compounds listed under the EPA Target Compound List for semivolatile compounds.

The person responsible for conducting the remediation shall address this issue through the variance process cited in the Technical Requirements at N.J.A.C. 7:26E-1.7. In the request for a variance, the regulatory citation, description and rationale to be used should be as follows:

"Per the Department's direction as noted in the NJDEP Listserv entitled "[SRRA]: Correction to Technical Requirements for Site Remediation, N.J.A.C. 7:26E, Table 2-1, Footnote 3," N.J.A.C. 7:26E, Table 2-1, Footnote 3 should not have included the phrase "that are not alkanes unless otherwise specified by analytical protocol." As such, no effort was made by the laboratory to specifically differentiate aliphatics as a class of compounds from those compounds determined to be TICs."

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