

**Site Remediation Reform Act (SRRA) Listserv Archives**  
**December 5, 2018 - [SRRA]: Correction to Technical Requirements**  
**for Site Remediation,**  
**N.J.A.C. 7:26E, Table 2-1, Footnote 3 and Heating Oil Tank System**  
**Remediation Rules,**  
**N.J.A.C. 7:26F, Table 2-1, Footnotes 4 and 5.**

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**Subject** [SRRA]: Correction to Technical Requirements for Site  
Remediation, N.J.A.C. 7:26E, Table 2-1, Footnote 3 and Heating  
Oil Tank System Remediation Rules, N.J.A.C. 7:26F, Table 2-1,  
Footnotes 4 and 5.

[SRRA]: Correction to Technical Requirements for Site Remediation, N.J.A.C.  
7:26E, Table 2-1, Footnote 3 and Heating Oil Tank System Remediation Rules,  
N.J.A.C. 7:26F, Table 2-1, Footnotes 4 and 5.

The DEP has been made aware that there is an inconsistency with respect to the analysis of 1-methylnaphthalene associated with semivolatile analyses of water samples 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, Footnotes 4 and 5. In the proposed HOTSR, the evaluation of tentatively identified compounds (TICs) in water samples associated with No. 2 heating oil contamination was not required. In lieu of TIC evaluation, the analysis of 1-methylnaphthalene was required. For consistency, Table 2-1 of the Technical Requirements was amended to be consistent with HOTSR.

Based on public comments to both the proposed amendments to the Technical Requirements and the proposed HOTSR, the DEP determined that semivolatile analysis of water samples associated with No. 2 heating oil contamination should include the evaluation of TICs. Table 2-1 of the Technical Requirements and Table 2-1 of the HOTSR were amended under rule adoption to reflect this requirement. As such, the requirement for the analysis of 1-methylnaphthalene should have been deleted from Footnote 3 of Table 2-1 of the Technical Requirements and Footnote 4 of Table 2-1 in HOTSR. It should be noted that Footnote 3 of Table 2-1 of the Technical Requirements applies to the analysis of semivolatiles in water samples for all listed petroleum products except gasoline and light petroleum distillates.

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 and Heating Oil Tank System Remediation Rules, N.J.A.C. 7:26F, Table 2-1, Footnotes 4 and 5," semivolatile analysis of water samples associated with petroleum product contamination does not require the specific analysis of 1-methylnaphthalene. As such, no effort was made by the laboratory to analyze for 1-methylnaphthalene as a target compound."

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