

Site Remediation Reform Act (SRRA) Listserv Archives

December 3, 2019 - [SRRA]: Updated "EPH Alternative Product Limit Calculator" (version 1.1) available

From: owner-srra@listserv.state.nj.us; on behalf of; SRRA
<SRRA@dep.nj.gov>
To: srra@listserv.state.nj.us
Date & Time: 12/3/2019 10:25:00 AM
Subject [SRRA]: Updated "EPH Alternative Product Limit Calculator"
(version 1.1) available

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The New Jersey Department of Environmental Protection (Department) has identified an error with the "Extractable Petroleum Hydrocarbon (EPH) Alternative Product Limit Concentration Calculator for Soil Version 1.0, June 2019 Release Date." For a soil sample analyzed for grain size distribution, if the finest three grain size fractions each have a value of 0.0% (e.g., grain size of 0.0015 mm = 0.0% passing, grain size of 0.005 mm = 0.0% passing, and grain size of 0.03 mm = 0.0% passing) the calculator will calculate an incorrect D10 value of 0.0000 mm (line 24 of the printout) which then returns an incorrect intrinsic permeability of $1.10\text{E-}11 \text{ m}^2$ (line 25 of the printout). Note these are the same default values that reside in the calculator prior to entering data on page 2 of the calculator. The Department has now corrected the error and posted a revised alternative product limit calculator Version 1.1, December 2019 Release Date. If an EPH Alternative Product Limit was calculated for an area of concern (AOC), the LSRP should determine if the finest three grain size fractions had values of 0.0%. If this occurred, the LSRP should re-run the data for all grain size distribution samples using the revised Version 1.1 of the calculator.

There are three possible outcomes when re-running the data using the revised calculator:

1. Despite the error, the D10 and intrinsic permeability values determined using the corrected calculator (Version 1.1) do not change the final value (i.e., the EPH Alternative Product Limit Concentration for Soil in this AOC) returned by the calculator on line 29 of the printout. No action is required by the LSRP.
 2. The error produced an incorrect lower (more stringent) EPH Alternative Product Limit Concentration for Soil in this AOC on line 29. If the EPH remediation of soil has not been completed, the LSRP may use the correct higher (less stringent) EPH Alternative Product Limit. If the remediation of soil has been completed, no action is required by the LSRP.
 3. The error resulted in an incorrect higher (less stringent) EPH Alternative Product Limit Concentration for Soil in this AOC on line 29.
 - a. If the EPH remediation of soil has not been completed, the LSRP should remediate using the correct lower (more stringent) EPH Alternative Product Limit (line 29).
 - b. If the EPH remediation for the AOC has been completed, the LSRP has the option to either:
 - i. remediate soil to the correct (more stringent) EPH Alternative Product Limit Concentration for Soil in this AOC.
- OR
- ii. identify the initial EPH Alternative Product Limit calculated and the corrected EPH Alternative Product Limit, and pursuant to N.J.A.C. 7:26E-1.7, institute a variance from N.J.A.C. 7:26E-5.1(e).

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