



New Jersey Department of Environmental Protection
Contaminated Site Remediation & Redevelopment

**INSTRUCTIONS FOR THE LSRP SUPPLEMENTAL CERTIFICATION FOR INITIAL
GROUND WATER REMEDIAL ACTION PERMIT APPLICATION FOR MONITORED
NATURAL ATTENUATION**

General Instructions

This LSRP Supplemental Certification for Initial Ground Water Remedial Action Permit (RAP) Application for Monitored Natural Attenuation (MNA) (Supplemental Certification) lists conditions in the introductory Initial Ground Water RAP Certification Criteria section and Section B that **must** be met for the person responsible for conducting the remediation and the Licensed Site Remediation Professional to be able to use this Supplemental Certification for Initial Ground Water RAP Application for MNA. The Department will use the Supplemental Certification to conduct a limited evaluation and expedite processing of the Ground Water RAP Application.

Ground Water RAP Applications accompanied by a Supplemental Certification will be processed ahead of applications submitted with the "Prioritized Initial RAP Application Addendum" form (https://www.nj.gov/dep/srp/srra/forms/prioritized_initial_rap_app_addendum.pdf?version_1_0) (Prioritized Addendum); only this Supplemental Certification should be submitted for the case if you are eligible for both. This Supplemental Certification can be submitted with the Initial Ground Water RAP Application to the Bureau of Case Assignment & Initial Notice (BCAIN) or after as a Supplemental Certification to cssr_brp_submissions@dep.nj.gov. This Supplemental Certification is not required to be submitted with a RAP Application.

1. Applicability.

This Supplemental Certification may be completed for a previously submitted Ground Water RAP Application (even if a Prioritized Addendum was submitted) that is pending Department review or for a new Initial Ground Water RAP Application. The Supplemental Certification may only be used for sites at which the retained LSRP can certify that all statements in the *Certification Criteria* section below are accurate and by certifying the conditions in Section B. Questions on the Supplemental Certification can be directed to the BRAP Duty Officer at 609-984-2990.

INITIAL GROUND WATER RAP FOR MNA CERTIFICATION CRITERIA:

For previously submitted Ground Water RAP Applications that are pending Department review (not applicable to new Initial Ground Water RAP Applications), the retained LSRP shall certify that the following two (2) statements are accurate by checking the associated boxes:

- The pending Ground Water RAP Application has no outstanding administrative issues (i.e., Notice of Administrative Deficiency); this can be verified in the DataMiner report (Pending Permit Progress Report by Program Interest ID) if the End Administrative Review task has a complete date.
- No comment letter (i.e., Notice of Incomplete RAP Application letter or Notice of Technical Deficiency) has been issued by the Department for the Area(s) of Concern (AOC(s)) associated with this RAP Application.
 - However, if a comment letter was issued and the application was subsequently withdrawn by the LSRP or deemed incomplete by the Department, the LSRP may submit this Supplemental Certification with a new Ground Water RAP Application that addresses the issue(s)/deficiency(ies) previously noted.

For both previously submitted Ground Water RAP Applications and new Initial Ground Water RAP Applications, the retained LSRP shall certify that the following thirteen (13) statements are accurate for the AOC(s) associated with this RAP Application by checking the associated boxes:

- This site is not a traditional oversight or direct oversight case with an assigned Department case manager. This Supplemental Certification may be submitted if the case is subject to direct oversight, but a case manager has not been assigned;
- This site is not a landfill case;
- This site is not a school, childcare, or residence;

- For the ground water data that are being used to demonstrate MNA, there is no individual contaminant concentration that is three (3) orders of magnitude or greater than the applicable Ground Water Remediation Standard (GWRS) and there is no individual contaminant concentration that exceeds 1% of its water solubility for a contaminant that has a density greater than water;

Note: The three (3) orders of magnitude should be based on the Class II-A aquifer GWRS in effect at the time the evaluation is performed. The Supplemental Certification can be used for any aquifer classification.

- There is no competent bedrock ground water contamination above the GWRS;

Note: As noted in Sections 3.1.3.1.3 and 3.4 of the Ground Water Technical Guidance: Site Investigation, Remedial Investigation, and Remedial Action Performance Monitoring document, competent bedrock refers to bedrock where structural features are present (e.g., bedding plane fractures, joint sets, foliation and lineaments, etc.). A transitional weathered bedrock zone frequently overlies competent bedrock. This occurs because physical and chemical weathering of the competent bedrock will cause the development of additional porosity within the rock, to where the rock is no longer competent. This weathered bedrock behaves as unconsolidated sediments (similar to overburden) overlying competent bedrock.

- There is not a commingled plume condition for similar constituents;

Note: The Supplemental Certification can be used if the Initial Ground Water RAP Application submitted addresses multiple releases at a site with the same co-permittees.

- There is no ground water contamination above the GWRS containing per- and polyfluoroalkyl substances (PFAS), including but not limited to perfluorononanoic acid (PFNA), perfluorooctanoic acid (PFOA), and perfluorooctane sulfonic acid (PFOS), or PFAS sampling was not required;
- There are no exceedances of the Acute or Chronic Aquatic Surface Water Ecological Screening Criteria or the Human Health Surface Water Standards in surface water or pore water pursuant to N.J.A.C. 7:26E-5.1(b)2 and (d);
- The Remedial Action does not include a proposed technical impracticability (TI) determination;
- The Remedial Action does not currently include an active ground water remediation system;
- The Remedial Action does not include a Point of Entry Treatment (POET) water system(s);

Note: The Supplemental Certification can be used if a POET system is present but was not installed as a requirement to address site-related ground water contamination and is not considered an engineering control required for the site.

- The Remedial Action does not include a vapor intrusion (VI) engineering control(s)/mitigation system(s); and

Note: The Supplemental Certification can be used if a VI mitigation system is present but was not installed as a requirement to address site-related ground water contamination and is not considered an engineering control required for the site.

- The Remedial Action does not include sub-slab soil gas contamination above the NJDEP's Soil Gas Screening Levels beneath any building(s) that require a VI Long-Term Monitoring Plan or a VI Change in Use Evaluation Plan. A VI Change in Use Evaluation Plan would be required for any building(s) with Sub-Slab Soil Gas Contamination that exceeds the Residential Soil Gas Screening Levels for a Non-Residential Structure or an Indeterminate VI Pathway Status.

2. Updates. The NJDEP may update this form periodically. Please ensure you are using the latest version of this form. Download the latest version of this form from the NJDEP Website: <https://dep.nj.gov/srp/forms/>.

3. Signatures. This form must be signed by the retained LSRP for the AOC(s) associated with this submitted Ground Water RAP Application. Be advised that this form will not be processed by the Department without the signature of the LSRP.

4. Submission of completed forms.

- For sites that have not submitted an Initial Ground Water RAP Application for MNA yet, complete and include the Supplemental Certification with the RAP Application that is submitted to BCAIN at the following address:

Bureau of Case Assignment & Initial Notice (BCAIN)
Contaminated Site Remediation & Redevelopment
NJ Department of Environmental Protection
401-05H
PO Box 420
Trenton, NJ 08625-0420

- For sites that have previously submitted an Initial Ground Water RAP Application for MNA, email the Supplemental Certification to: csrr_brap_submissions@dep.nj.gov.

Section A. Case Information

- Site Name:** Provide the name of the site (i.e., ABC Corporation Site) according to DataMiner, which can be obtained at: <https://njems.nj.gov/DataMiner/Search/SearchByCategory?isExternal=y&getCategory=y&catName=Site+Remediation>;
- List All AKAs:** List all other known names for the site;
- Street Address:** Provide the street address for the site. Note: This should be the physical location of the site – not the mailing address – and should be consistent with what is in the tax database(s) (e.g., etaxmaps.com and https://tax1.co.monmouth.nj.us/cgi-bin/prc6.cgi?menu=index&ms_user=monm&passwd=data&district=1301&mode=11);
- Municipality:** Provide the name of the municipality(ies) in which the site is physically located and indicate if it is a township, borough, village, or city. Note: This should be the name of the incorporated municipality and not the local name;
- County:** Provide the name of the county(ies) where the site is located;
- Zip code:** Enter the five-digit code for the physical location of the site;
- Program Interest (PI) Number(s):** Provide the PI Number assigned by the NJDEP according to DataMiner (see web link above);
- Case Tracking Number:** Provide the case tracking number for the site;
- Remedial Action Permit Activity Number:** Provide the RAP activity number for the site if applicable (i.e., RAP240001);
- Specific Area(s) of Concern responsible for the ground water contamination:** This area should list the AOC(s) associated with this RAP Application; and
- Indicate if the RAP Contact Information for the Person Responsible for Conducting the Remediation and Property Owner previously provided on the Initial Ground Water RAP Application is current. If “No”, please attach revised pages 2 and 9 of the Initial Ground Water RAP Application with the updated contact information and signature to this form.

Section B. Licensed Site Remediation Professional Information and Certification Statement

This form shall be signed by the LSRP who is submitting this notification in accordance with N.J.S.A. 58:10C-14, and N.J.S.A. 58:10B-1.3b(1) and (2). The LSRP certifying this Certification Statement is certifying that all information contained herein is correct and appropriate.

- Provide the LSRP ID Number;
- Provide the name, phone number, email and mailing address (city/town, state, zip code) of the LSRP; and
- The certification in this section shall be signed and dated by the LSRP.

Section B lists 9 subsections with conditions that **must** be certified for the site to be eligible for this Supplemental Certification. At least one box should be checked off in each subsection. **If a subsection(s) is left unchecked, then the LSRP will be asked to resubmit the Supplemental Certification.** If more than one box is appropriate for the AOC(s) associated with this RAP Application, additional boxes may be checked.

- Monitored Natural Attenuation (MNA): certify that the RAR demonstrates that MNA is an effective remedial action for this AOC(s) pursuant to N.J.A.C. 7:26C-7.5(c)3 and N.J.A.C. 7:26E-5.

2. Delineation – check one: certify that ground water contamination has been horizontally and vertically delineated.
- Ground water contamination has been horizontally and vertically delineated pursuant to N.J.A.C. 7:26E-4.3(a)4 with sample analytical results at or below the applicable GWRS without employing a variance for delineation.
 - Ground water contamination has been horizontally and vertically delineated pursuant to N.J.A.C. 7:26E-4.3(a)4, employing a variance(s) that is documented in the RAR per N.J.A.C. 7:26E-1.7.
- Note: The Supplemental Certification can be used if the ground water contamination is migrating or has migrated off-site.
3. Contaminant Trend Analysis – check at least one: certify the ground water contaminant trend analysis.
- Decreasing trends in accordance with Section 6.1.2.3 of the MNA Technical Guidance document.
 - Non-decreasing (stable) levels in accordance with Section 6.1.2.4 of the MNA Technical Guidance document.
4. Ground Water Contaminant Plume Behavior: certify that the ground water plume behavior along the contaminant path can be considered shrinking or stable pursuant to Section 6.1.1 of the MNA Technical Guidance document.
5. Free or Residual Product: certify that all free and residual product as defined in N.J.A.C. 7:26E-1.8 has been treated or removed from the unsaturated and saturated zones pursuant to N.J.A.C. 7:26E-5.1(e). MNA of free and residual product is prohibited pursuant to N.J.A.C. 7:26E-5.1(e).
6. Soil Contamination: certify that soil contamination in the unsaturated zone has been remediated to the applicable numeric or narrative Soil Remediation Standard for the Migration to Ground Water Exposure Pathway pursuant to N.J.A.C. 7:26E-5.2.
7. Ground Water Monitoring Plan (GWMP): certify that a sufficient monitoring well network is included in the GWMP pursuant to N.J.A.C. 7:26C-7.5(c)4 and in accordance with Section VII.2.f of the Ground Water RAP Guidance Document that:
- monitors the characteristics and movement of contaminated ground water based on the model that calibrated the eventual extent of contaminated ground water, including at least three monitoring wells that account for triangulation for ground water flow confirmation;
 - assesses the effectiveness of the MNA remedy throughout the duration of the RAP;
 - is representative of the entire horizontal and vertical extent of the ground water contaminant plume; and
 - includes at least one AOC well and at least one clean (below the GWRS) downgradient sentinel well in all directions of ground water flow. An alternate method may be appropriate if a sentinel well is not possible (e.g., surface water sampling).
8. Receptors: certify that all potentially impacted receptors from the ground water contamination associated with this AOC(s) have been evaluated pursuant to N.J.A.C. 7:26E-1.12.
9. Remedial Action Protectiveness: certify that the Ground Water Remedial Action is protective of public health and the safety of the environment and satisfies all the requirements of N.J.A.C. 7:26E-5.1(d).

At least one box should be checked in each subsection noted above; further explanation can be provided in Section C if necessary.

Please see Section XII, Potentially Applicable Guidance Documents in the [Ground Water RAP Guidance Document](#) as it relates to subsections listed above.

Section C. ADDITIONAL INFORMATION TO SUPPORT LSRP CERTIFICATION (OPTIONAL)

This section may be used to provide other pertinent information, support professional judgment justification, or to note any inconsistencies with the Initial Ground Water RAP Application previously submitted. This section may also be used to support any of the certification statements made if necessary.

Note: The inclusion of information in Section C may necessitate additional inspection and review by NJDEP staff. The information provided should not exceed the space allowed in Section C.