

Remedial Priority System - Frequently Asked Questions

1. ***What is the Remedial Priority System?***

The Remedial Priority System is a computerized model designed to help the Department to categorize contaminated sites based on potential risk to public health, safety or the environment as well as other relevant factors deemed appropriate by the Department.

2. ***Why is the Department ranking contaminated sites, and what are they doing with this information?***

Pursuant to N.J.S.A. 58:10-23.16, the Department is mandated to rank contaminated sites. The Department intends to use the RPS as one means of assisting SRP in allocating its resources.

3. ***What information is used in the model?***

The RPS model utilizes multiple geographic data bases and layers, receptor information, and site specific ground water, soil, and vapor intrusion sampling data.

4. ***What is the significance of the Categories?***

All sites have been ranked into 5 categories. Category 1 represents the least potential risk and Category 5 represents the greatest potential risk. These categories were determined using Jenk's Natural Breaks algorithm which is a standard method for dividing a dataset into a certain number of homogenous classes. It is a commonly used algorithm in GIS applications. There is not an equal amount of sites per Category. This information will assist the Department when making informed decisions about allocating its resources

5. ***How is my Human Health category derived?***

The individual components of the model for each media (soil, groundwater, and vapor intrusion) have a range of values within which an individual site score's. The scores for each media are then added for a total Human Health Score. The scores are then catalogued for relative ranking with sites of similar scores and placed into Categories 1 through 5. Category 1 represents the lowest score and thus the least potential risk and Category 5 represents the highest score and thus the greatest potential risk.

6. ***How is my site categorized if I do not have analytical data?***

Surrogate values are utilized based on the type of site being evaluated. The 75th percentile of the values of similar types of sites (i.e., ISRA, UST, etc.) is used as the surrogate. For instance, for a regulated underground storage tank site, the 75th percentile of all regulated underground storage tanks data would be used to derive a value. The same would apply to ISRA sites and other types of sites throughout the Program to ascertain the most appropriate value for a specific type of site.

7. ***Does the phase of investigation or remediation affect my category?***

Yes, as sites move through the remedial process beginning with a Preliminary Assessment/Site Investigation to a Remedial Investigation more is known about the site's condition. This is especially critical regarding whether pathways to receptors are open or closed. The model assumes all pathways are open unless demonstrated, based on analytical data, that a pathway is closed.

8. ***How can I provide information to the Department if I believe the initial score is based on old or incorrect data or information?***

As part of the Department's first phase of information request letters, the Department has provided responsible entities a one-time opportunity to review their initial score/category and provide the Department with any supplemental information or analytical data that were previously submitted to and approved by the Department or otherwise should have been submitted. This will assist the Department to better represent site conditions, pathways, potential receptors and geographic coordinates. A responsible entity or their designee can provide this information through a feedback mechanism as provided on the RPS web site at <https://dep.nj.gov/srp/rps/>. DEP will review the data, and upon its acceptance, incorporate the data into the model and the resulting

Category will be posted on the web page *on a date to be determined*. The Department is conducting a second round of information request letters in spring 2013. In the future, all data will be uploaded internally as LSRPs submit data through the normal submission process.

9. *Am I required to take action?*

No, if you are satisfied with your category determination no action is required.

10. *How frequently is the RPS List updated?*

The first round of category determinations was finalized and will be posted on the SRP website *on a date to be determined* and then updated during the first year at 6 month intervals. Thereafter it is anticipated that the categories will be updated quarterly to accommodate new information received through the remedial process.

11. *Are all contaminated sites in New Jersey categorized utilizing the RPS System?*

No, certain sites have been excluded from the RPS ranking system as follows:

- Post NFA/RAO Monitoring Sites
- Homeowner Sites
- Unknown Source Sites

[\(See Exclusions\)](#)

12. *If my site is a Category 5 is it automatically put into direct oversight?*

No, if a Category 5 site is being actively remediated pursuant to the regulations and in compliance with the mandatory and regulatory timeframes then it would not be considered for direct Department oversight. Please go to the Site Remediation Reform Act (SRRA), [N.J.S.A. 58:10C-27](#) for a complete list of conditions that will or may place a site under direct Department oversight.

13. *If I am remediating my site in accordance with the regulatory and mandatory timeframes, does it matter what Category my site falls into?*

Regardless of what category your site falls into, the Department's objective is to ensure that all contaminated sites are being remediated in accordance with all rules, regulations, and time frames. Categories represent potential risk and are not reflective of compliance. If your site is being actively remediated and is in compliance with our regulations and stated objectives, your site would not be considered for placement into direct oversight. Please go to the Site Remediation Reform Act (SRRA), N.J.S.A. 58:10C-27 for a complete list of conditions for Direct Oversight.

14. *Are sites removed from the RPS ranking report upon issuance of an RAO?*

Once the Department receives a full site, unrestricted use RAO it is removed from the Known Contaminated Sites in New Jersey - Active Sites with Confirmed Contamination Report. Which is where the RPS categorization (1-5) appears. If the Department receives an RAO for only a portion of the site (AOCs) then the site remains on the RPS report until all AOCs are remediated. Sites with limited restricted or restricted RAOs will remain on the Known Contaminated Sites in New Jersey Report but will be marked as "Excluded".

15. *If a site is removed from the RPS report can it be placed back on the list?*

Yes. If a new release is discovered at the site it would be evaluated based on new information provided and placed into the appropriate category. Further, if a Remedial Action Outcome is invalidated then the site would be placed back on the report in the appropriate category.

16. *Is the Feedback Loop Mandatory?*

No, the Feedback Loop is strictly voluntary. A Responsible Entity may choose to use or not use the Feedback Loop to update the information used as input to the RPS Model. All future revisions will be provided through the normal submission process once the Feedback Loop is closed. The Department will open the Feedback Loop as

part of its second round of information request letter. This loop will ONLY be available for recipients of the second round of letters.

17. *Why did I receive a letter for my site, my LSRP recently issued an RAO?*

At this time, the case status is updated manually by the Department. This process usually is completed within 30 days of receipt by the Department; however, sometimes this process can be extended. Once the data entry is finished, the case status in the system will be updated to reflect the issuance of the RAO and the site will not appear on the KCSNJ report and will be removed from the RPS report if there are no other active cases at the site. Please see Question 14 for more information about how sites will be removed from the RPS report.

To see if your site is on the KCSNJ, run the [Active Sites with Confirmed Contamination](#) Report to determine the status of your site. The [All SRP Sites by Selected PI Number](#) Report can be used to evaluate the status of your specific case (once the report is run, click on the "Site Detail" for the case level information).

18. *Why is my RPS attachment missing all of the values and calculated scores for the RPS Model?*

The attachment to the RPS Letter does not provide the calculated values. It only provided a quantitative indicator, "Yes" or "No", for each of the input values and indicates the information that the Department uses to create the input values to the RPS model. The arrangement of the attachment is to indicate the process used to score a site. Once the feedback Loop is completed, the Department will calculate a final score for the site.

19. *Can I score my site using the information provided on the attachment and the web site?*

No, a site score cannot be calculated based on the information provided in the attachment and web site. The goal of the feedback loop is to provide the Responsible Entity with the RPS Model input values and allow the Responsible Entity a chance to update the input data that may not be accurate and/or current. The Department is providing the Responsible Entity with a one-time chance to update the input values prior to running the model and posting the results.

20. *What information can I update during the Feedback Loop?*

The Feedback Loop allows for updates to several input variables. Among these are the site coordinates, pathway scores (based on receptor Evaluation information), Electronic Data Deliverables (EDD), Extent Areas, and ground water flow. See the RPS Feedback Loop Assistance for more information about the input data that can be modified during the Feedback Loop. Please read the [RPS Feedback Loop Help](#) for more details about what information can be updated and how.

21. *Do I have to use NJDEP Online to submit my updates?*

Yes, the correct form has to be completed and submitted as an attachment via the online service.

22. *Do I have to use an LSRP to submit the changes?*

If your site is required to hire a Licensed Site Remediation Professional (LSRP), then the information provided in Step 2 must be submitted by an LSRP. The RPS Information Request Form may be submitted by anyone designated by the Responsible Entity. Cases that do not need to hire an LSRP can have the information submitted by the consultant for the site.