



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

LISA P. JACKSON
Acting Commissioner

MEMORANDUM

To: Site Remediation and Waste Management Program Staff

From: Joseph J. Seebode, Assistant Commissioner
Site Remediation and Waste Management

Subject: "Sheen" Remediation Policy Initiative

Date: February 1, 2006

The Site Remediation and Waste Management Program (SRWM) has carefully considered the issue of protracted remediations being conducted to address residual sheen on the water table resulting from discharges of #2 fuel oil. SRWM proposes the following approach to address this issue and will use this procedure as a program-wide policy (Pilot project) for eighteen months. Upon evaluating the approach and concluding on its effectiveness, the Department can consider incorporating the policy as new provisions of the Technical Requirements for Site Remediation, N.J.A.C. 7:26E.

SRWM is proposing to allow sheen to remain after remediation is conducted under specific conditions. When these conditions are met the Department has confidence that these remediations will be protective of human health and the environment. SRWM is proposing to use the same logic and strategy for any discharge of #1, 4 or 6 fuel oil or diesel fuel because the characteristics of the materials and the nature of the health and environmental impacts are essentially the same as they are for #2 fuel oil. This will provide clear and consistent requirements for the remediation of discharged petroleum products from any source.

Change in technical requirements already implemented with regard to sheen issues:

1. SRWM has determined that the soil-water agitation test is no longer an acceptable method for determining the presence of free and/or residual product and intends to delete the method from N.J.A.C. 7:26E-2.1, Quality assurance requirements.

Proposed changes in technical requirements for implementation during Pilot project:

2. SRWM will not require additional remediation of sheen on the water table if the sheen is determined to be discontinuous based on the criteria provided in "A" below and all the site conditions provided in "B" below are met.
 - A. A discontinuous sheen is defined as an observable amount of number 1, 2, 4 or 6 fuel oil or diesel fuel on the surface of the water table in any well or excavation, and is:
 - Broken or intermittent and does not cover the majority of the water surface; and
 - Less than 0.25mm thick as measured using an interface probe.
 - B. The following site conditions are documented:
 - Appropriate sampling and remedial actions have been conducted for soil and ground water at the site pursuant to the Technical Requirements for Site Remediation and the Field Sampling Procedures Manual;
 - Ground water is not contaminated above any numeric ground water remediation standard;
 - Soil is not contaminated above any numeric soil remediation standard; and
 - There are no impacts from the sheen to any receptors such as wells, surface waters, building interiors, or subsurface utilities.
3. If a continuous sheen is present on the water table in any well or excavation associated with the area of concern, additional remediation will be required.

Finally, SRWM will review requests for No Further Action letters for sites meeting the above conditions on a case-by-case basis to ensure that each remediation is adequately protective of public health and the environment.