Response Action Outcome Guidance Document Change Log

List of significant changes from Version 3.0 (October 2021) to Version 3.1 (November 2021)

1) Cover Page

Document Date Changed from October 2021 to November 2021. Document Version Changed from Version 3.0 to Version 3.1.

2) Section V. Response Action Outcome Variations

Under section V.A.2.a, the second bullet (see below) has been deleted. Exceedances of Impact to Ground Water Soil Screening Levels (IGWSSL) or Migration to Ground Water Soil Remediation Standards (MGWSRS) would be remediated via capping and therefore would require an engineering control and be addressed via a Restricted Use RAO. Therefore, it is not appropriate to issue a Limited Restricted Use RAO to address soil exceedances of IGWSSL or MGWSRS.

- Impact to Ground Water Soil Screening Levels (IGWSSL) or Migration to Ground Water Soil Remediation Standards (MGWSRS), as applicable have been addressed (via remediation, compliance option, site-specific standard, etc.);
- 3) Section VI. Issuing RAOs Involving Ground Water Remedies and Coordination with Remedial Action Permits
 - A. Ground water is remediated to the Ground Water Remediation Standards (N.J.A.C. 7:26D): Unrestricted Use RAO This section was reworded to clarify that the issuance of an Unrestricted Use RAO is appropriate when ground water is in compliance with Ground Water Remediation Standards; therefore, there is no need to obtain a Ground Water Remedial Action Permit (RAP).
 - **B.** Ground water contamination remains above the Ground Water Remediation Standards: Limited Restricted Use RAO This section has been reworked to align with the Ground Water RAP Guidance, In Situ Remediation: Design Considerations and Performance Monitoring Technical Guidance, and the Ground Water SI/RI/RA
 - C. Ground water contamination remains above the Ground Water Remediation Standards via an Active Remediation System: Restricted Use RAO. This section has been updated to align with the Ground Water RAP Guidance, In Situ Remediation: Design Considerations and Performance Monitoring Technical Guidance, and the Ground Water SI/RI/RA.

This change also clarifies that a Restricted Use RAO is required when any engineering control (e.g., active system for potable well or vapor impacts) is used to mitigate a receptor associated with a ground water RAP.

The inclusion of technical impracticability of ground water for Restricted Use RAOs was included in error. For proper evaluation of technical Impracticability issues refer to the Technical Impracticability Guidance for Ground Water.