

# Panel: Soil Remedial Action Permits

## Topics

### 1. Permit foibles:

- Common mistakes when completing a permit, what to do when there is a cap disturbance, and what the permit writers will look for in the RAR

### 2. Timing of the Deed Notice:

- Confusion because the CEA is filed before the Deed Notice

### 3. Recommendations:

- When property owners won't sign the Deed Notice

### 4. Notices in Lieu of Deed Notice

# Panel: Discharge to GW Permit Applications

## Topic #1

### A. DGW Permit Applications

- Proposed Sampling Parameters do not match DGW conditions
- Insufficient down gradient monitoring
- Missing Public Notice Requirements
- Applications lacking detail/unclear proposals

### B. NJDEP Comment Inconsistencies

- NJDEP comments standardized (Improving)

## Resolution

- Technical Guidance:  
*Performance Monitoring of In-situ Ground Water Remedial Actions*
- Revision of June 2007 NJPDES DGW Technical Manual for the SRP
- Update of the CEA Guidance

# Panel: Discharge to GW Permit Applications

## Topic #2

### Timeframes for Issuance/Modification Approvals

- NJDEP Backlog (Improved)
- Modification Approvals with Limitations (via E-mail)

### Resolution

- Stakeholder familiarity with the process
- Aforementioned Guidance Manuals
- Ability to Issue Expedited Permits (Not Routine)

## Topic #3

### Presumptive/Fast Track Approvals (PBR, General Permits, LSRP Approval)

### Resolution

- NJPDES Regulation (N.J.A.C. 7:14A ) Modifications

# Panel: GW Remedial Action Permits

## Topic #1

“Are RAPs a 2nd Bite of the Apple for DEP?”

- LSRPs issue all other key documents (RIR, RAW, RAR, RAO); the Department issues the RAP;
- N.J.A.C. 7:26C-7.1(a)ii The purpose of RAPs are to monitor the effectiveness of the remedial actions

### Resolution

- Training
- RAP Guidance Docs being updated
- Checklists

# Panel: GW Remedial Action Permits

## Topic #2

### “How to handle Old CEA’s” or Post NFA CEA’s vs LSR CEAs

- DEP Comments: We try to “honor” Conditional NFA’s that were issued, must be protective.
- Need to update information, data, compare to today’s Standards
- LSRP is now Certifying the past remedial actions conducted prior to the NFA are acceptable.

### Resolution:

- Training
- Suggestions?

## Topic #3

- Items presented in the “Checklist & Helpful Hints”