Document and Response Action Outcome Inspection and Review

Len Romino
Assistant Director
Site Remediation Program
• Shall inspect all documents upon receipt
• Inspection determines whether documents undergo further review
• SRRA contains both mandatory and discretionary criteria for further review
• Further review may also include referral to other groups within SRP
Typical Reasons for Additional Document Review

- Contamination from Upgradient Source
- Inconsistent answers on the Document Form or Case Info. Doc. (CID)
- Sensitive Populations – Res./Child Care/Schools
- Nearby Receptors- Potable Wells, VI
- Past Deficiencies on the Case
Typical Reasons for Additional Document Review

- Site Specific Remediation Standards
- Naturally Occurring or Background Contamination
- Ecological Issues
- Potential IEC
Documents Received Thru August 2013

- Total Key Documents Recv’d: 13,494
- 2013 Monthly Avg.: 763
- Total RAOs Issued: 3,069
- 2013 Monthly Avg.: 198
- RAOs Withdrawn by LSRP: 106
- RAOs Invalidated by DEP: 3
- Avg. Inspection/Review Time: 47 days
The RAO document defines

- The Site
  Address, Lot & Block, PI #, Incident #, ISRA #

- Remedial Action Type
  Unrestricted, Limited, Restricted, etc.

- Scope of Remediation
  Entire site, 1 or More AOCs, ISRA leasehold

- Limitations on the Remediation
  RAO Notices
Common Administrative Issues

- Information on forms/CID/reports conflict
- Incorrect Scope of Remediation (entire site vs. AOC)
- Incorrect Remedial Action Type (unrestricted, limited restricted, restricted)
- Incorrect communication center numbers used
  - Same communication center # used in notice and heading
- Incorrect Notices Used
- New incident not called in when identified
- Outstanding fees not paid
Common Technical Issues

- Professional judgment not adequately explained
- Off-site source contamination not properly documented
- Delineation not complete
- IEC case must be “terminated” before entire site RAO is issued
- RA Permits must be issued by DEP prior to RAO
- CEA Lift (as applicable) must be obtained prior to RAO
Amending or Withdrawing an RAO

The RAO does not accurately reflect the site or the remediation that was conducted

- Department will request LSRP amend or withdraw RAO within 30 days when:
  - Withdraw if additional work is required that will take longer than 30 days
  - Amend for administrative aspects that are incorrect or missing
What to do if the model document language doesn’t fit case specifics

• Discuss with the Department the case specific issues (contact Myrna Campion or Len Romino 609-633-1408)

• Obtain department prior approval for changes to RAO model language

• Document the case specifics in the Remedial Action Report (RAR) and CID
Resources

• Guidance for the issuance of response action outcomes
  

• RAO Form

• Instruction for the RAO form

• RAO Point of Contact: Renee Wright
  
  Renee.Wright@dep.state.nj.us