

# NJDEP Changes Rules for Regulated Underground Storage Tanks

SEPTEMBER 2012

## Who is affected?

Owners/operators of regulated underground storage tanks (USTs) are required to have a Release Response Plan onsite which includes contact information for the facility, spill cleanup contractors and State/Federal agencies. In addition, Release Response Plans are required to include procedures to be followed in the event of a leak or discharge of a hazardous substance, as well as Administrative Requirements for the Remediation of Contaminated Sites if the UST must be closed.

## What's new?

NJDEP recently issued a Compliance Assistance Alert (<http://tinyurl.com/EJIF-UST-LSRP>) regarding compliance with the Site Remediation Reform Act (SRRA) which recently went into effect on May 7, 2012. As of this date, UST owners/operators are required to hire a Licensed Site Remediation Professional (LSRP) to oversee remediation at all regulated UST sites (including those that owe tank closure reports).

In addition to hiring an LSRP for remediation and tank closures, UST owners/operators are required to update their Release Response Plan to identify an LSRP as a contact, among other responders, should a release occur. Release Response Plans are required to be kept onsite for review during State and/or County inspections.

## What to do?

UST owners/operators must update their Release Response Plan to include a LSRP. If you do not currently work with an LSRP, please contact your municipal engineer to determine if they have a LSRP on staff that can be listed as your contact. According to our discussions of this requirement, it is sufficient to list a company name instead of an individual that has an LSRP license. In addition, if an EJIF member does NOT have an LSRP (or LSRP company) that they are familiar with enough to cite on their RRP, that EJIF member is welcome to list Birdsall Services Group as their LSRP on this plan. Please note that NO obligation to use BSG is created by listing us on your plan, and NO contractual relationship is created. If and when you need an LSRP to perform remedial activities at your site, you are free to choose the company best suited for your needs. In the present, listing BSG will allow you to come into compliance with this new regulatory requirement. A list of current LSRPs can be found at [http://www.nj.gov/dep/srp/srra/lrsp/temporary\\_lsrp\\_list.htm](http://www.nj.gov/dep/srp/srra/lrsp/temporary_lsrp_list.htm).

Please keep in mind that New Jersey has a very active tank enforcement, inspection and compliance assistance program. Facilities with registered underground storage tanks are inspected once every three years. Release Response Plans are required to be available for inspection.



For more information on this compliance requirement, please review NJDEP's letter at [tinyurl.com/EJIF-UST-LSRP](http://tinyurl.com/EJIF-UST-LSRP), or contact:

Richard Erickson, Sr. VP at 908.497.8900 x6175 or via email at [rerickson@birdsall.com](mailto:rerickson@birdsall.com)

