

Site Remediation Reform Act Implementation

Post Guidance for Presumptive Remedies Issue License Application Post Approval/Denial Criteria Post Fees (application/annual)

0 months

1 month

2 month

3

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Month 0 - 3

- Prepare LSP application
- Prepare LSP-UST application
- Develop SOP for receiving application (eg: flow, NJEMS file, money, administratively complete, etc.)
- Determine application fee
- Determine annual fee for LSP/ LSP-UST
- Prepare application guidance
 - Establish process to accept/deny
 - Establish criteria for references
 - Criteria to prove meet E&E standards
 - Criteria for proof of course work
 - Rolling application/deadline or combination
- Changes to NJEMS
 - License number
 - License type
 - Track compliance for LSP
- Prepare presumptive remedy guidance
 - Vet with stakeholders
 - Develop procedure for alternate presumptive remedy
- Identify all necessary forms
 - Key documents (subject to audit)
 - To determine compliance with mandatory timeframes
 - Other (RFS, change in LSP, etc.)

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**Publish Interim Rules
Propose Board Rules
LSRP Program Begins**

3 month

4 month

5 month

6



Month 3 - 5

- Decisions:
 - What's a new case
 - Criteria for volunteers and/or process
- Develop certification standards
- Establish procedures for temp LSRP complaints
- Develop all forms
- Complete mandatory timeframes for interim rules
 - Finalize receptor evaluation
 - Identify which are for interim/ final rules
 - Procedure to apply for extension
 - Standards to approve or deny
- Finalize RAPS
 - Develop guidance
 - Identify other guidance (EPA, other states, ITRC)
- RAO
 - Standard statement
 - Minimum requirements
 - Process to file with DEP
 - Process to invalidate
- Fees
 - Permit
 - Identify all documents that must be submitted with a fee
 - Identify when direct billing
- Develop procedures for TAGs
- Develop permit program
 - Rules
 - Identify permittee
 - Develop process to apply, approve
 - Develop conditions
 - Expiration/no expiration
 - NJEMS changes
 - Electronic application
 - monitoring
 - Fees
 - Application
 - Annual
 - Process/timeline for converting to permits

Month 3 - 6

- Assess Applications for temporary license
- Finalize audit procedures
 - Document flow
 - Screening
 - Roles/responsibilities
 - Audit level determination
 - Identify what needs to be tracked
 - Document results
- Finalize document flow
 - Record creation
 - Fee payment
 - Assignment
- NJEMS
 - Audit tracking
 - Forms and mandatory timeframes
 - Track compliance of RP
- Establish enforcement procedures for
 - Mandatory timeframes (which are priority)
 - Grace period
 - Hiring LSRP/notification
 - ACO/MOA compliance
- Finalize "LSRP process"
- Establish board
 - Establish bylaws
 - Rules
 - Criteria for applying for license
 - Criteria for test
 - Establish licensing period
 - Renewal request
 - Establish mechanism to bring action before board
 - Enforcement
 - Mechanism to dispute decisions
 - Application
 - Application fees
 - Annual fees
 - Requirements for Continuing Education Credits
 - Process to approve Continuing Education Credits

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Month 6 - 9

- Issue temporary licenses
- Finalize computer system for issuing and tracking license
- Begin LSRP process
 - Allocation of staff
 - Assessment/Adjustment/Refinement of process
- Begin tracking mandatory timeframes
- Begin converting O&M and Biennial Certifications to permits

Month 6 - 12

- Finalize presumptive remedies
- Finalize all mandatory timelines
- Test final ranking system
- Develop criteria for removal of “material that would pose acute health or safety hazard (§ 12g(2))
- Develop criteria for rendering “the property unusable” (§12g(1))
- Develop criteria for prohibition on landfills (§12g(12))
- Rule changes for
 - ISRA
 - Subrogation
 - CNS
 - RFS

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Propose DEP Rules Finalize Ranking System Issue Guidelines for Direct Oversight

9 month

10 month

11 month

12



Month 6 - 12

- Finalize presumptive remedies
- Finalize all mandatory timelines
- Test final ranking system
- Develop criteria for removal of “material that would pose acute health or safety hazard
- Develop criteria for direct oversight cases
- Rule changes for
 - oversight
 - mandatory timeframes
 - presumptive remedies

Month 9 - 12

- Begin response to comments for Board rules

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Month 12 - 18

- Contract to develop exam
 - Composition of exam (50/50)
- Complete response to comments for Board rules
- Establish procedures for full transition

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Adopt Board Rules



Month 12 – 18 (continued)

- Contract to develop exam
 - Composition of exam (50/50)
- Complete response to comments for Board rules
- Establish procedures for full transition

Month 15 - 18

- Begin response to comments on DEP rules

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Month 18 - 20

- Accept applications for permanent license

Month 18 - 24

- Finalize response to comments on DEP rules

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Adopt DEP LSRP rules



Month 18 - 24

- Finalize response to comments on DEP rules

Month 21 - 24

- Review applications
- Determine who sits for exam
- Administer exam

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Month 24 - 27

- Issue permanent licenses
- Revoke temporary licenses

Month 24 – 36

- Continue transition

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- Month 24 – 36
- Continue transition

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- Month 24 – 36
- Continue transition

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Full Program



- Month 24 – 36
 - Continue transition