



Brilliant Environmental Services, LLC (*Brilliant*) is a full-service environmental consulting and contracting firm, integrating today's technologies for tomorrow's solutions. Headquartered in New Jersey, *Brilliant* specializes in investigation, remediation, brownfields redevelopment, and underground storage tank services. *Brilliant* is the underground storage tank compliance expert.



NJDEP Announces Registration Deadline for Companies that Haul or Process Soil, Fill Recyclable Material in New Jersey

Businesses conducting soil and fill recyclable material services that do not already possess an A-901 license have until April 20, 2020, to register with the New Jersey Department of Environmental Protection as a first step to comply with a newly enacted licensing law requiring greater oversight of those activities.

Governor Phil Murphy signed the law - known as the "Dirty Dirt Bill" on Jan. 21, which expands the NJDEP's oversight of companies that engage in, or provide, soil and fill recycling services including collection, transportation, processing,

brokering, storage, purchase, sale or disposition of soil and fill recyclable materials.

The law also requires affected companies that do not already possess an A-901 license to submit an application and a disclosure statement to the Attorney General's Office detailing their work with soil and fill material in order to receive a soil and fill recycling license for operations in New Jersey by Oct. 19, 2020. The Attorney General's Office, New Jersey State Police and NJDEP will review the disclosure statements in consideration of granting a license.

Businesses that do not register by the deadline or businesses that apply for a license thereafter and do not meet the license review requirements will no longer be allowed to perform soil or fill recycling services work in New Jersey.

Businesses that register may continue their services while awaiting a license. Those who apply for a license after the deadline will have to wait for the license before continuing soil and fill recycling services. Businesses that believe they may be subject to the new law may review a DEP Compliance Advisory at www.nj.gov/dep/enforcement/advisories-date.html.

The new law follows NJDEP's recent launch of the Guard Your Backyard campaign, which has a dedicated website offering local guidance and a model ordinance that municipal leaders can download and modify to suit their local needs. Enacting ordinances can give local governments the authority to determine what kind of fill material may be brought into their communities.

The soil and fill recycling materials registration form for the DEP is available at www.nj.gov/dep/dshw/a901/a901frms.htm

To learn more about Guard Your Backyard, visit www.guardyourbackyard.nj.gov

Site Remediation and Waste Management Program SRRRA 2.0 Rule Meeting - Remedial Action Permits

On Monday, February 24, 2020, Lynne Mitchell the Rule Manager of the Site Remediation and Waste Management Program held a stakeholder meeting to listen to ideas for modifications to the current Remedial Action Permit (RAP) program. The Site Remediation Program is considering changes to the RAP program as they review and revise ARRCs and the Technical Regulations following the recent adoption of SRRRA 2.0. Some of the type of new Permits discussed could streamline the process and allow minor review by NJDEP and/or issuance of a permit by the LSRP. Some of the types of permits are: Virtual Institutional Control, Permit-By Rule expansion and General Permits. In addition there was also a discussion on potential exemptions to aspects of rules by Developers, Public Entities and Municipalities. There is still a lot of work to be done and no promises were made.

If I have the opportunity to attend in the future, I will keep readers apprised of any progress.

NJDEP Updates the Online Services based on the Evaluation of Extractable Petroleum Hydrocarbons (EPH) in Soil Technical Guidance published in June 2019

NJDEP announces minor changes to the Preliminary Assessment/Site Investigation (PA/SI) Report, Site Investigation Report (SIR), Remedial Investigation Report (RIR), Remedial Action Workplan (RAW), and Remedial Action Report (RAR) Online Services made to address the submission requirements resulting from the issuance of the Evaluation of Extractable Petroleum Hydrocarbons (EPH) in Soil Technical Guidance.

In the PA/SI, SIR, RIR, RAW, and RAR Online Services, the following updates have been made to the "Details" screen for the "Contaminated Soil Conditions" grid dropdown choices:

1. "Category 1 - EPH equal to or greater than 8000 mg/kg" has been changed to: "Category 1 - EPH greater than 8000 mg/kg"
2. "Category 2 - EPH equal to or greater than 17000 mg/kg" has been changed to: "Category 2 - EPH greater than applicable default product limit"
3. New addition: "EPH Alternative Product Limit developed"

Directional text was added above the "Contaminated Soil Conditions" grid to advise the user: When the "Extractable Petroleum Hydrocarbons Alternative Product Limit Calculator" is used to develop alternative product limit(s), the excel file(s) must be uploaded in the attachment page for the submission to be complete.

An Attachment Type called: "EPH Alternative Product Limit Calculator" has been added to the list of available upload types on the "Attachment Upload" tab.

These changes and additions will assist the NJDEP to assign and efficiently evaluate the submission during the inspection process. Please refer to Appendix 2.2 in the Evaluation of Extractable Petroleum Hydrocarbons (EPH) in Soil Technical Guidance for a complete list of required deliverables to be submitted to the NJDEP in conjunction with the EPH Alternative Product Calculator spreadsheet(s).

Where to find *Brilliant* in February

Whether it is seminars, instructing a continuing education program or networking, *Brilliant* is always in the community. Where to find us:

March 13, 2020 - Phil Brilliant, as the 1st Vice-Chairperson of the Greater Toms River Chamber of Commerce, will be attending Member Connect at

7:30AM.

March 15, 2020 - Phil Brilliant, as the 1st Vice-Chairperson of the Greater Toms River Chamber of Commerce will be at the Grand Opening Celebration of Code Ninjas in Toms River at noon.

March 17, 2020 - Phil Brilliant will be an instructor during The Quantitative Conceptual Site Model Approach: Maximizing the Utility of Your CSM Course at the Rutgers EcoComplex in Bordentown, NJ. [Register](#)

March 19, 2020 - Phil Brilliant, as the 1st Vice-Chairperson of the Greater Toms River Chamber of Commerce, will be attending the Wine Not? networking event at Bacchus Winemaking Club, Toms River. [Register](#)

March 23, 2020 - Phil Brilliant, as the 1st Vice-Chairperson of the Greater Toms River Chamber of Commerce, will be attending Connections & Cocktails at Bahama Breeze, Toms River. [Register](#)

March 29, 2020 - Phil Brilliant, as President of Congregation B'nai Israel of Toms River, will be attending the Maccabeats concert at the Jay and Linda Grunin Center for the Arts on the campus of Ocean County College. [Tickets](#)

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