

MANKO | GOLD | KATCHER | FOX_{LLP}

AN ENVIRONMENTAL AND ENERGY LAW PRACTICE

SITE REMEDIATION REFORM ACT UPDATE

Underground Storage Tanks (USTs – N.J.A.C. 7:14B)

- **Use of LSRPs** –An LSRP is required for all regulated UST tank closures commenced on or after November 4, 2009. Where remediation is conducted at a regulated UST, it must be performed and documents submitted in accordance with the Technical Requirements for Site Remediation and applicable provisions of the new SRRA regulations and an RAO will be issued by the LSRP upon completion.
- **Potential Additional Fees** – The fees and permitting provisions in the new LSRP program will apply to regulated tank investigations and closures.
- **Unregulated Heating Oil Tanks (UHOTs)** – UHOT cases may continue to use a subsurface evaluator with NJDEP oversight and will be issued an NFA by NJDEP. They may choose to use an LSRP and be issued a RAO.