

NJDEP Releases Updated Remedial Action Permit Forms and Instructions: Key Changes to New Jersey's Site Remediation Program

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Overview

On February 17, 2026, the New Jersey Department of Environmental Protection's (NJDEP) released updated Remedial Action Permit (RAP) forms and instructions to reflect recently adopted updates to New Jersey's site remediation regulations. The NJDEP has modernized the RAP program, expanded it to cover indoor air, and introduced a more streamlined (and structured) permitting approach.

The changes affect a broad range of stakeholders, including parties responsible for conducting remediation, current RAP holders, parties conducting remediation, Licensed Site Remediation Professionals (LSRPs), environmental consultants, and parties involved in transactions for contaminated properties.

Summary of Key Program Changes

Indoor Air as a Third RAP Media Component

The most significant modification is that RAPs now explicitly include indoor air as a third "media" component, which will be in addition to the soil and groundwater RAPs that have previously existed. Where vapor intrusion or indoor air impacts are present, the RAP process will now require institutional and/or engineering controls tailored to that pathway.

Combined RAPs for Soil, Groundwater and Indoor Air

NJDEP will now issue a single combined RAP covering soil, groundwater, and indoor air, replacing the prior approach of separate, media-specific permits. The NJDEP has indicated this should simplify biennial protectiveness evaluations and fee scheduling. If an additional permit is required after a RAP has already been issued, that change will generally be handled through a RAP modification rather than a separate application.

Five Focused RAP Categories

The amendments establish five specialized "Focused RAP" categories intended for "expedited review" of common remedial scenarios. These permits are condition based, and permittees must meet the required conditions and cannot deviate from the specified requirements.

Permit Type	Applicability
Focused Permit I	Restricted use soil remedial action without engineering controls; contamination below Non-Residential Soil Remediation Standards and Migration to Ground Water Standards but above Residential Soil Remediation Standard.
Focused Permit II	Voluntary use of a Presumptive Remedy for soil at non-sensitive sites (not schools, childcare centers, or residences).
Focused Permit III	Presumptive or Alternative Presumptive Remedy pre-approved by the NJDEP (approval letter required).
Focused Permit IV	Historic Fill-only site; no Person Responsible for Conducting the Remediation will be required for this stand-alone permit.
Focused Permit V	Ground Water-Monitored Natural Attenuation where a Classification Exception Area (CEA) is limited to the property boundaries with no off-site receptor impacts.

Indoor Air Notification Area (IANA)

The amendments create an entirely new institutional control named the Indoor Air Notification Area (IANA), which is analogous to the groundwater Classification Exception Area but focused on vapor intrusion/indoor air. Key elements include required notification to municipalities, counties, and building occupants within the IANA; submission of maps, sampling data, and GIS deliverables; NJDEP approval and public registration; and issuance of a Response Action Outcome by an LSRP for closure.

New and Revised RAP Forms

The NJDEP has posted new and revised forms (Version 1.0 dated February 17, 2026), including:

- **RAP Initial/New Media Component Application** – Consolidated application for initial RAPs, Focused RAPs I–V, and new media component additions
- **RAP Technical Modification Application** – For technical modifications across all media
- **Administrative Changes Application** – For minor, non-technical updates
- **RAP Application to Administratively Combine RAPs** – To consolidate existing RAPs
- **RAP Termination/Removal of a Media Component Application** – To terminate RAPs or remove media components
- **Revised Contact Information Change Form (Version 1.2)**

The forms use color-coding: yellow (soil), blue (groundwater), green (indoor air), and gray (all media). The NJDEP has indicated that additional forms will be released in the coming weeks. All updated forms and instructions are available on the NJDEP CSRR Forms page at <https://dep.nj.gov/srp/forms/>.

What This Means for You

These updates represent the most significant changes to New Jersey's Site Remediation Program in years, especially for projects involving vapor intrusion/indoor air and for parties managing ongoing RAP compliance.

For Existing RAP Holders:

- Review current permits to determine whether a modification or administrative combination may be advisable under the new framework.
- Confirm LSRP arrangements and any changes are documented within the required timeframes (including the 45-day transition requirement, where applicable).
- Prepare for updated biennial certification requirements, including operation, maintenance, and monitoring documentation.

For Parties Conducting Remediation:

- Determine whether one of the Focused RAP categories may apply (and whether you can meet conditions without deviations).
- Consider the implications of the new IANA requirements if vapor intrusion is a concern at your site.
- Prepare for updated biennial certification expectations, including operation, maintenance, and monitoring documentation.

Regulatory note (for reference): This alert summarizes NJDEP's implementation of amendments to N.J.A.C. 7:26B, 7:26C, 7:26E, and 7:26F, including SRRA 2.0 implementation and incorporation of updated remediation standards.

For More Information



For questions regarding the new RAP forms and procedures or their implications for specific sites or transactions, please contact Randi Schillinger, Esq. and Geri Albin, Esq.