# RBCR Focus Session 10

Tiering & Fees: Presented April 15th

1. **For Tier 1A checklist, can you confirm the * and ** footnotes are correct? For instance, it would seem a well receptor survey would not be required if groundwater is not impacted?**

   Yes, the footnotes are correct. The * footnote is saying if it has been determined that the release has not impacted GW then a well receptor survey has been "completed" (i.e., it's not necessary). Likewise, for **, if there are no VOSs or Hg, then there is no source for a volatility risk so a vapor intrusion receptor survey has been "completed" (i.e., it's not necessary).

2. **Is it true that for site-wide remediation, the tier is based on the highest risk condition present anywhere on the site?**

   Yes.

3. **In the future can you provide more information on fee calculations and the 10% multiplier.**

   The "0.1" used in the tiering fee formula is the 10% multiplier.

4. **Does a 50% municipal discount apply to year zero fees and annual fees for municipalities who are creators and maintainers?**

   Yes, the 50% discount applies to all tiering fees paid by exempted entities, which may include municipal groups.

5. **Can you please clarify what you mean when you say that tier 3 doesn't require LEP oversight?**

   Tier 3 releases can be managed by an LEP or a qualified professional.

6. **Review of NDDB maps serves as a scoping level ecological risk assessment?**

   No. The definition of a scoping level risk assessment means visual observation of potential pathways from a release to ecological receptors (22a-134tt-1(a)(136)). The reference to NDDB in the case study during the April 15, 2026, training was used simply as an example of information utilized by the fictional consultant.

7. **Do you have a template or form developed for a release remediation closure report? If so, where can I find it on your website?**

No, we do not have one at this time.

8. **Is the single tiering fee for an owner/creator with multiple releases explicitly limited to one property?**

   Yes, the single fee option for tiering is for multiple releases on the same parcel. However, the other single payer option that can be used for multiple parcels allows for a C/M to pay fees for all their properties on the same date.

9. **For Case Study 1: is volatile petroleum hydrocarbons required. The form does not a indicate evaluation of VPH only VOCs. Is a VPH needed for a petroleum release?**

   The definition of volatile petroleum substance means a volatile organic substance found in gasoline, diesel fuel, fuel oil, heating oil, kerosene, jet fuel, or similar fuels, along with volatile organic substances that may have been used as fuel additives. By this definition, volatile petroleum substances are considered volatile organic substance, so if a release is petroleum based it should be assessed for the volatile hydrocarbon ranges that can be quantitatively assessed using VPH.

10. **With respect to tiering, what if immediate actions/remedial excavation were all completed before 3/1? There was no requirement for IA plans or RAP per the RBCRs. Can we check yes for each and explain in a report?**

    If no SER or ERR conditions were observed post March 1st, 2026, then the IAs requirements are not applicable and therefore IAs are not required to be conducted.

11. **For determining fees, will REACT prompt the correct fee and ask about all the potential reductions so that nothing is missed? Or is that on the person filling out the form or the LEP to determine the correct fee?**

    REACT will calculate the fee amount and will ask about fee reductions when a Tier Checklist is submitted.

.