



RBCR Training Q&A*

Property Transfer Program & VolX: Presented March 4, 2026

- 1. How about existing transfer act sites with remaining obligations that transfer after March 1, 2026. Does the certifying party remain the same? Can the party be changed? How is it ensured that the new transferee will allow the certifying party access?**

The certifying party cannot change. It has never been DEEP policy to ensure access between certifying parties and property owners - this is coodiantion between them if the scenario presents.

- 2. What if a property that should have been subject to the Transfer Act but did not file at transfer, is sold in the future?**

A Property Transfer filing will still need to be filed and dated to the date of the transfer, pre-March 1

- 3. Just to confirm but I'm sure you've already addressed it, can existing establishments with remediation obligations under the PTP use the RBCR cleanup standards that are not included in the RSRs (i.e. permits by rule)?**

You have to submit a complete Release Catalog and take the bridge to the RBCR program.

- 4. Which voluntary program does your client need to enter if they have received a DECD Brownfield grant?**

133x if in the ABC program, New Parcel Wide Cleanup Program if receiving DECD Brownfields grant but not in a Brownfields Cleanup Program

- 5. 60 day time frame, is this from the time the first release is discovered and if not met, the site cannot use the new Y program in the future at all. 60 days to do a Phase II may not be possible**

Requirement is to start Phase II and notify DEEP within 60 days, not to complete Phase II

- 6. 133y slides indicated a Phase III "may be completed". Just to clarify, does this mean a Phase III is not a hard requirement under new 133y?**

A Phase III is required for closure - the "may be completed" is the language in the statute.

- 7. Will a 22a-133x site be treated in the same manner as a PTP site?**

No - there are no statutory or regulatory provisions to exempt releases at sites in 133x

8. Why are PTP sites not able to use exemptions in 22a-134tt-1(i), when other new RBCR provisions are available for use?

1(i) is not part of the RSRs.

9. If you can't confirm when the release occurred does that default you to RBCRs instead of using the existing PTL filing for that newly discovered release.

Correct

*Additional questions pending answering/internal review; to be updated regularly and version/publication date will be updated.