Multiple Contaminated Areas of Concerns (CAOCs)

March 18, 2015

One Site with CAOCs Caused by Different Responsible Parties /Person Responsible for Conducting Remediation (RP/PRCR)

For SRP PI with different RP/PRCRs:

- Each RP/PRCR will have its own case represented by different Activities in NJEMS (Activity/Activities).

- Each RP/PRCR will have its own Annual Remediation Fee.

One RP/PRCR with multiple Triggering Events (non-ISRA)

When there is one RP/PRCR which has caused multiple triggering events:

- Each triggering event will have its own Activity and Annual Remediation Fee (ARF) unless the RP/PRCR requests that the cases be combined.

- Activity tracking needs to include separate Receptor Evaluation tasks for each Activity/triggering event.

- RP/PRCR can incorporate subsequent triggering event(s) by notifying BCAIN. Earliest timeframes will apply to all cases.

One RP/PRCR with multiple Triggering Events (non-ISRA) con't.

- Where RI was already completed, a 2nd RI due task (or SI for UST case) will be added to Activity Tracking.

- If RI is not done, then 2nd trigger must adhere to the earlier date, or broken out into a new case/Activity with a new due date. Once broken out, Activity cannot be merged again later.

- For ISRA site with non-ISRA trigger under one Activity; original timeframe applies.

One Triggering Event, One Case, Multiple Contaminated Areas of Concern (CAOCs) with Multiple LSRPs

- The RP/PRCR has obligation to comply with the regulations and mandatory timeframes.

- Department will enforce against the RP/PRCR and not the LSRP.

- This type of case should be tracked under one case/Activity. The RP/PRCR must ensure the Annual Remediation Fee Online Service represents all CAOCs and media regardless of the number of LSRPS working on the case.