

# RAOs and Check Processing Times

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# RAO Submissions – Portal Service

## Remitting an RAO via the Portal with Unpaid Invoices

If the LSRP is running an RAO service which will not close the case, and the RAO service produces a green warning message that there is an unpaid invoice(s), the LSRP may still continue with the filing via the following direction:

If the LSRP is running an RAO service which will close the case, (an entire site service, or an AOC service, where the LSRP answers, “No”, to the question: “Are there any outstanding contaminated AOCs associated with the case where a final remediation document has not been filed?”), the RAO service will produce a red message stopping the LSRP if there is an invoice that is not marked paid in our system.

If appropriate, the billing unit can bypass the billing validation, and allow the LSRP to file the RAO. You may contact the Office of Direct Billing & Cost Recovery at: (609) 633-0701, or e-mail the section chief at [alphonse.inserra@dep.nj.gov](mailto:alphonse.inserra@dep.nj.gov) to make inquiries regarding unpaid invoices, and if they are required to be paid prior to issuance of the RAO.

## Paying an Invoice Online –

Most bills that trigger the online service’s billing validation, can be paid online (the exception is an initial RAP application fee, as a paper check must be remitted for that initial fee with the physical application to BCAIN). An invoice may be paid online via e-check or credit card. There is no fee associated with an e-check payment. There is a 2% fee required for credit card payments, along with a \$1.00 surcharge for each individual payment.

If the system does not allow one to pay an invoice, the billing unit may be contacted for inquiries at the same contact information provided above.

# Fee Invoices Issuing While Documents Being Reviewed (i.e., RAPs, RAOs, etc.)

## Inappropriate Fee Issuance

There are many instances involving document submissions that have been remitted for DEP review, where that review takes longer than normal to complete. That occurrence may be due to various issues (i.e., backlogged cases, insufficient information submitted, invoices remain unpaid, etc.).

In many instances invoices are issued inappropriately due to NJDEP not being able to review that submission prior to another fee invoice being issued. No matter what the rationale for the invoice issuance prior to the review being completed, the billing office may be contacted to request that an invoice be rescinded. That request may be made by calling the billing office (609) 633-0701 or e-mailing the section chief of ODBCR at [alphonse.inserra@dep.nj.gov](mailto:alphonse.inserra@dep.nj.gov).

ODBCR will review the request, and if appropriate, will either suspend or cancel the invoice, and turn off billing at the appropriate activity, so that no additional future invoices are issued, and inform the requester that the invoice may be discarded.

# RAP / RAOs-Conditional Extensions

**Question:** I believe that it is DEP's policy that those seeking an extension to their timeframe while waiting for DEP to issue an RAP have 30 days from the issuance of the permit to submit their RAOs. This might be difficult if they're waiting 4 to 6 weeks for a check to clear before submitting their RAO. Is there a workaround to be had for this?

The amount of time it takes BRAP to issue the permit +30 days is added to the existing timeframe. It's not 30 days from the issuance of the permit.

Example:

RA MTF of 5/6/2022.

Extension request, RAR, Permit Application received March 6, 2022 (60 days prior to 5/6/22).

Conditional Extension Approved

Permit issued March 5/6/23

Duration to issue permit (March 6,2022 to May 5/6/23)=426 days

RA MTF Due date= 5/6/2022+ 426 days + 30 days = **8/5/23**.

“The Department has considered your request and hereby **conditionally approves** the extension request as long as the permit application is administratively and technically complete. The final extension shall equal the actual duration of time it takes the Department to issue the Remedial Action Permit plus an additional 30 days. Adjustments to the Case Tracking Tool will be made after issuance of the permit with the actual date the final remediation document is due.”