New Jersey
Department of Environmental Protection

Contaminated Site Remediation &
Redevelopment

SITE REMEDIATION REFORM ACT PROGRAM

ANNUAL FEE CALCULATION REPORT FOR FISCAL YEAR (FY) 2025

June 3rd, 2024

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In accordance with the Administrative Requirements for the Remediation of Contaminated Sites (ARRCS) at N.J.A.C. 7:26C-4.2(c) and 4.5(e), the New Jersey Department of Environmental Protection (the Department) has prepared this Annual Contaminated Site Remediation & Redevelopment Fee Calculation Report (Report) for fiscal year (FY) 2025 concerning annual remediation fees and fees associated with remedial action permits. This Report is available for download from the Department's website at https://dep.nj.gov/srp/guidance/fees-guidance/.

Two categories of fees are discussed in the Report: the annual remediation fee, and remedial action permit fees. Those persons who are actively remediating sites are charged annual remediation fees, and those persons who have implemented a remedial action that involves a remedial action permit are charged remedial action permit fees.

The authority for charging annual remediation fees to cover the costs of administering the Site Remediation Reform Act (SRRA) Program is both SRRA (N.J.S.A. 58:10C-1 et seq.) and the Brownfield and Contaminated Site Remediation Act (N.J.S.A. 58:10B-1 et seq.). SRRA allows the Department to charge reasonable application fees to cover the costs of processing applications for remedial action permits for engineering or institutional controls, and to charge reasonable annual fees to cover the costs of the administration and enforcement of the remedial action permits (N.J.S.A. 58:10C-19e). The Brownfield and Contaminated Site Remediation Act requires a person who initiates a remediation to pay all applicable fees and oversight costs as required by the Department (N.J.S.A. 58:10B-1.3b(5)).

This Report identifies the fees calculated for FY 2025 and compares the input data for FY 2024 with the input data for FY 2025 for both the annual remediation fees and the remedial action permit fees. The Department published notice of its fees for FY 2024 in the June 5, 2023, New Jersey Register at 55 N.J.R. 1228(b), and made them available online in the Fee Guidance Document for FY 2024 (www.nj.gov/dep/srp/guidance/srra/fee_guidance_document.pdf).

ANNUAL REMEDIATION FEE

The annual remediation fees cover the Department's costs to operate the "active" remediation side of the SRRA program, which are those cases for which a final remediation document has not been issued (i.e., either a no further action letter from the Department or a response action outcome from the licensed site remediation professional (LSRP). To calculate the annual remediation fee, Contaminated Site Remediation & Redevelopment (CSRR) is first required to calculate the annual budget for the active remediation side of the SRRA Program (SRRA Program Budget) by determining the dollar amount needed to accomplish all tasks associated with administering the active remediation side of the SRRA Program, using the information contained in the Department's annual budget submission to the Department of the Treasury for the upcoming fiscal year. This budget is calculated based on the number of full-time equivalents (FTEs) that CSRR staff spend on "active" cases. No costs associated with any other area within CSRR that are funded by a source outside of the SRRA Program Budget are to be included in this calculation (see N.J.A.C. 7:26C-4.2(b)1). For FY 2025, the total SRRA Program Budget is $24.229 million.

To determine the annual remediation fee, the rules provide that the Department will allocate the total SRRA Program Budget to each of the two components of the annual fee, the contaminated

area of concern (CAOC) component and the contaminated media component. 65 percent of the revenue to be collected through annual remediation fees is allocated to CAOC fees, and 35 percent is allocated to contaminated media fees (see N.J.A.C. 7:26C-4.2(b)2).

The FY 2025 budget for the active remediation side of the SRRA Program is $24.229 million, apportioned as $15.749 million to CAOC fees and $8.480 million to contaminated media fees.

Contaminated Area of Concern Fee FY 2025

The Department is required to calculate the raw base CAOC fee by first determining the total number of CAOCs reported by persons responsible for conducting the remediation in the previous calendar year (see N.J.A.C. 7:26C-4.2(b)3), and then dividing the 65 percent revenue figure by that number of CAOCs. The base fee is then used to establish the CAOC fee for each of four categories. The categories reflect the number and type of CAOCs. A description of each of the categories of concern is codified at N.J.A.C. 7:26C-4.2(b)4 and also appears in Appendix A to this report.

The following distribution of the total number of CAOCs across each of the four CAOC categories applies to FY 2025 and is based on data reported by persons responsible for conducting the remediation in the previous calendar year.

FY 2025 Numbers of Contaminated Areas of Concern

Contaminated Area of Concern Fee Category (CAOC)	Number of Elements CY 2023
Category 1	1,623
Category 2	10,088
Category 3	1,760
Category 4	1,386
Total CAOCs	14,857

The calculated raw base CAOC fee is therefore $1,060.04 ($15.749 million divided by 14,857). To ensure that the active remediation side of the SRRA Program does not collect more than $15.749 million from collection of the CAOC fee, the Department adjusted the raw base fee downward to $950 to derive the base CAOC fee for FY 2025. This represents an increase of $25, or 2.7 percent, from FY 2024 ($925).

Next, the Department multiplied the base CAOC fee by the multiplier for each CAOC category to derive the raw CAOC fee for each category, using the list of categories of CAOC and the applicable multiplier for each category set forth at N.J.A.C. 7:26C-4.2(b)4i through iv. As described in greater detail in Appendix A, the multiplier for Category 1 is one, the multiplier for Category 2 is two, the multiplier for Category 3 is 11, and the multiplier for Category 4 is 22.

As stated above, the raw base CAOC fee equals the 65 percent revenue figure divided by the number of CAOCs from the previous calendar year. The CAOC base fee for FY 2025 is increasing compared to the CAOC base fee for FY 2024. This is due to the overall budget increasing slightly from FY 2024 to FY 2025. The increase is due to the decrease in the total number of CAOCs and increase of the overall budget. This is represented by the 65 percent revenue figure.

The final CAOC fee for each contaminated area of concern category for FY 2025 is presented in the below table.

FY 2025 Contaminated Area of Concern Fee

Category	Multiplier	Final Fee for FY 2025
1	1 base fee applies	$950
2	2 times base fee	$1,900
3	11 times base fee	$10,450
4	22 times base fee	$20,900

Contaminated Media Fee FY 2025

The contaminated media fee is calculated by first determining the total number of contaminated media reported by persons responsible for conducting the remediation in the previous calendar year (see N.J.A.C. 7:26C-4.2(b)5), and then dividing that number into the total contaminated media revenues that must be generated. The three categories of contaminated media are contaminated ground water, contaminated sediment, and ground water contaminated above a Surface Water Quality Standard that is migrating into surface water.

The total number of contaminated media reported in calendar year 2023 was 5,286. Therefore, the calculated contaminated media fee for FY 2025 is $1,604.24 ($8.480 million divided by 5,286 contaminated media reported), which is rounded down to the nearest $5.00, or $1,600.00. This represents an increase of $30, or 1.9 percent, from FY 2024 ($1,570).

As stated above, the contaminated media fee equals the 35 percent revenue figure divided by the number of contaminated media from the previous calendar year. Similar to the increase in the CAOC base fee from FY 2024 to FY 2025, the contaminated media fee is increasing due to an increase to the overall budget from FY 2024 to FY 2025. This is represented by the 35 percent revenue figure.

Example Annual Remediation Fee Calculation FY 2025

The example below illustrates how a person responsible for conducting the remediation would calculate their annual remediation fee, where that person's site includes four areas of concern and three types of contaminated media, using the FY 2025 fee rates:

Category 2 contaminated area of concern fee	
(Category 2 = two through 10 areas of concern)	$1,900
Contaminated media fee	
(Three types of contaminated media @$1,600)	+ $4,800
TOTAL ANNUAL REMEDIATION FEE	$6,700

The fee structure built into the ARRCS rules takes into account the variation among remediation projects by requiring the person responsible for conducting the remediation to calculate the annual remediation fee based on the number of contaminated areas of concern and the number of contaminated media that the person is remediating. A person who is remediating only a single contaminated area of concern will be required to pay a significantly lower fee than a person who is remediating several contaminated areas of concern. Additionally, as contaminated areas of

concern and contaminated media are satisfactorily remediated, the amount of the annual remediation fee will decrease, thereby providing added incentive for conducting remediation in a timely fashion.

Comparison of FY 2024 Fees and FY 2025 Fees

Following is a tabular comparison of the FY 2024 fees and the calculated and final FY 2025 fees:

Comparison of FY 2024 and FY 2025 Contaminated Area of Concern (CAOC) Fees

CAOC Category	FY 2024 Fee	Calculated FY 2025 Fee	Difference in Fee Between FY 2024 and FY 2025
1	$925	$950	$25
2	$1,850	$1,900	$50
3	$10,175	$10,450	$275
4	$20,350	$20,900	$550
Contaminated media	$1,570	$1,600	$30

* Category 2, 3, and 4 fees were determined by multiplying the base fee by the appropriate multiplier pursuant to N.J.A.C. 7:26C-4.2(b)4.

Comparison of Number of Elements used for FY 2024 and for FY 2025

CAOC Category	Number of Elements FY 2024	Number of Elements FY 2025	Difference in Number of Elements Between FY 2024 and FY 2025
1	1,592	1,623	31
2	10,394	10,088	(306)
3	1,727	1,760	33
4	1,260	1,386	126
Total AOCs	14,973	14,857	(116)
Contaminated media	5,284	5,286	2

FEES ASSOCIATED WITH REMEDIAL ACTION PERMITS

The remedial action permit fees fund the portion of the SRRA program that oversees sites for which remedial actions have been implemented that require a remedial action permit. The estimated cost for FY 2025, which (as explained further below) is based on salary, fringe, and indirect costs associated with reviewing the permit documents and administering permits, is $3,308,519.70. Most work associated with remedial action permits is performed by Contaminated Site Remediation & Redevelopment (CSRR) staff in the Bureau of Remedial Action Permitting (BRAP). As more fully described below, Remedial Action Permit Fees consist of two elements: the number of hours required by the CSRR staff to conduct the listed remedial action permit functions, and the hourly rate of CSRR staff working on permit activities (see N.J.A.C. 7:26C-4.5(c)). There are two types of remedial action permit fees: (1) the remedial action permit activity fee and (2) the remedial action permit annual fee. The four types of remedial action permit

activities are (1) permit application review, (2) permit modification, (3) permit transfer and (4) permit termination. The four types of remedial action permits are (1) deed notice with no engineering control(s), (2) deed notice with engineering control(s), (3) natural attenuation ground water remedial action, and (4) any other ground water remedial action. These permit fees were first promulgated in 2009 and adjusted by rulemaking in 2012. Thereafter, beginning in 2014 for FY 2015 (except in 2020 for FY 2021), the Department has adjusted the fees annually by notice. The most recent notice of fee adjustment was published in 2023 for FY 2024 (55 N.J.R. 1228(b)).

Remedial Action Permit Fees Hourly Rate FY 2025

The formula the Department is required to use to calculate the staff hourly rate and the descriptions of each of the variables in that formula are codified at N.J.A.C. 7:26C-4.5(d). In summary, the Department uses the following formula, where AS means average annual salary, FB means fringe benefit rate, IC means indirect costs, OE means average operational expenses and BH means annual billable hours per full time staff member:

$$\text{Hourly rate} = \frac{AS + FB + IC + OE}{BH}$$

AS includes the average annual salary of the CSRR staff directly involved in reviewing, issuing, and overseeing remedial action permits. This includes BRAP staff FTEs directly assigned to the activity, as well as staff in other bureaus (such as staff performing inspections of engineering controls). AS also includes a component that reflects the salaries for program overhead staff who perform functions related to the fee activity (such as enforcement and information technology). The two groups are referred to as “direct staff” and “non-direct staff” in the following narrative.

The number of BRAP staff FTEs dedicated to review of remedial action permit activities is 6.5, and the number of staff in other bureaus directly assigned to remedial action permitting activities is 12.64, for a total of 19.14 FTEs. This represents a decrease in the BRAP FTEs from FY 2024 of 0.45 FTEs, and an increase in FTEs in other bureaus of 2.84 FTEs. The decrease in the BRAP FTE and the increase in FTE in other Bureaus is due to the transfer of responsibility from BRAP to supporting Bureaus for Financial Assurance activities. Additional staff have also been allocated from supporting Bureaus to accelerate the administrative review process.

Annual salary is calculated by first determining the ratio of the number of direct staff FTEs to the total number of non-direct staff (this is the total staff in the Contaminated Site Remediation portion of CSRR less the total number of non-direct staff). The total number of staff in the Contaminated Site Remediation portion of CSRR is 380, and the total number of non-direct staff whose salary costs are not included in the indirect rate is 23. Therefore, the total number of non-direct staff is 357. The ratio is 19.14/357, or 0.054. This ratio is then multiplied by the total number of non-direct staff to derive the number of support staff FTEs whose salaries must be covered by the BRAP Program fees. When the number of non-direct staff of 23 is multiplied by 0.054, the resulting number of support FTEs is 1.24. The total number of FTEs involved in remedial action permit activities is therefore 20.38 (19.14 direct staff FTEs and 1.24 non-direct staff FTEs).

The Department then determined the average salary of the 23 non-direct staff by taking the total salary of the non-direct staff FTEs of $2,326,535.49 and dividing it by the total number of non-direct staff of 23, resulting in an average non-direct staff salary of $101,153.72. Multiplying the average non-direct staff salary of $101,153.72 by the total number of non-direct staff FTEs (1.24) results in the total non-direct staff FTE salary of $125,430.61.

Next, the total salary of the 19.14 direct staff FTEs ($1,375,587.98) was added to the total non-direct staff FTE salary ($125,430.61), to derive the total annual salaries of staff involved in remedial action permit activities of $1,501,018.59. That total was then divided by the total number of FTEs involved in remedial action permit activities (20.38 total FTEs: 19.14 direct FTEs plus 1.23 non-direct FTEs). The resulting value of $73,651.55 is AS.

Fringe benefits, which include, but are not limited to, health benefits and retirement plans, are calculated by multiplying the fringe benefit rate supplied to the Department by the Treasury's Office of Management and Budget by AS, as calculated above. For the purposes of this calculation, the Department is using the FY 2024 rate of 77.15 percent. Accordingly, fringe benefits are equal to .7715 times $73,651.55 or $56,822.17.

Indirect costs, which include, but are not limited to utilities, building leases, and management salaries, are calculated by multiplying the rate negotiated annually between the Department and the US Environmental Protection Agency by the sum of annual salary and fringe benefits. For the purposes of this calculation, the Department is using the FY 2024 rate of 19.50 percent. Accordingly, indirect costs for FY 2025 are the sum of $73,651.55 plus $56,822.17 ($130,473.72), multiplied by 0.1950, or $25,442.38.

Operating expenses are the average operational expenses attributable to a program staff FTE directly assigned to the activity. The Department estimates this variable to be $6,500 per FTE.

BH is the total annual billable hours per FTE. This number is 1,428.

When all the above-calculated values are inserted into the hourly rate formula, the resulting hourly rate is as follows:

$$\$113.74 = \frac{\$73,651.55 + \$56,822.17 + \$25,442.38 + \$6,500.00}{1,428}$$

The Department determined to round $113.74 up to the nearest $5.00, or $115.00, and to use $115.00 to calculate the fee for each type of remedial action permit activity and the annual fee for each type of remedial action permit.

Comparison of FY 2024 RAP Hourly Rate with FY 2025 RAP Hourly Rate

For the FY 2024 remedial action permit activity fees, the Department used an hourly rate of $110.00 to calculate the fees to be charged by the remedial action permitting program. Therefore, the hourly rate calculated for FY 2025 represents an increase of $5.00 from the FY 2024 hourly rate.

Remedial Action Permit Activity Fees FY 2025

To calculate the remedial action permit activity fee for each type of remedial action permit activity, the Department determined the average number of hours required by BRAP staff to issue, modify, transfer, or terminate remedial action permits. The Department then multiplied the average number of hours by $115.00 per hour to derive the remedial action permit activity fee for each type of remedial action permit activity.

When the remedial action permit activity fees were first codified in November 2009, the remedial action permit program had no historical data on which it could rely to calculate the various fees, and therefore the Department had to estimate the average number of hours it would take staff to perform the various remedial action permit activities. Likewise, the Department estimated the staff hours when it amended these fees in 2012. As the remedial action permitting program has matured, the Department has continued to gain a better understanding of the average number of hours it takes staff to perform the various remedial action permit activities. A comparison of the average number of hours required to perform specific remedial action permit activities between FY 2024 and FY 2025 is as follows:

Comparison of FY 2024 and FY 2025 Staff Hours to Complete Remedial Action Permit Activities

Remedial Action Permit Activity	FY 2024 Staff Hours	FY 2025 Staff Hours	Difference in Staff Hours between FY 2024 and FY 2025
Soil Remedial Action Permits			
Remedial Action Permit Application	13	12	(1)
Remedial Action Permit Modification	12	12	0
Remedial Action Permit Transfer	5	3	(2)
Remedial Action Permit Termination	10	10	0
Ground Water - Natural Attenuation Remedial Action Permits			
Remedial Action Permit Application	8	7	(1)
Remedial Action Permit Modification	8	6	(2)
Remedial Action Permit Transfer	4	3	(1)
Remedial Action Permit Termination	5	5	0
Ground Water - Active System Remedial Action Permits			
Remedial Action Permit Application	8	7	(1)
Remedial Action Permit Modification	8	6	(2)
Remedial Action Permit Transfer	4	3	(1)
Remedial Action Permit Termination	5	5	0

The number of staff hours, the staff hourly rate, and the resulting calculated remedial action permit activity fees for FY 2025 are as follows:

FY 2025 Staff Hours, Hourly Rate, and Remedial Action Permit Activity Fees

Remedial Action Permit Activity	Soil Remedial Action Permit			Ground Water - Natural Attenuation Remedial Action Permit			Ground Water - Active System Remedial Action Permit		
	Staff hours	Average Staff Hourly Rate	Calculated FY 2025 fee	Staff hours	Average Staff Hourly Rate	Calculated FY 2025 fee	Staff hours	Average Staff Hourly Rate	Calculated FY 2025 fee
Remedial Action Permit Application	12	$115	$1,380	7	$115	$805	7	$115	$805
Remedial Action Permit Modification Fee	12	$115	$1,380	6	$115	$690	6	$115	$690
Remedial Action Permit Transfer Fee	3	$115	$345	3	$115	$345	3	$115	$345
Remedial Action Permit Termination Fee	10	$115	$1,150	5	$115	$575	5	$115	$575

As shown in the table below, the calculated remedial action permit activity fees for FY 2025 increased 5 percent for four remedial action permit activities and decreased between 3 percent and 37 percent for the remaining eight remedial action permit activities compared to the FY 2024 fees (refer to the column “Difference in Fee between FY 2024 and FY 2025”). Compared to FY 2024, all fee increases are mostly due to the increase in the hourly rate caused by an increase in the fringe benefit rate. The decreases are due to decreases in the number of hours to complete the given task, irrespective of the increase in the hourly rate. Additionally, specific to active system ground water remedial action permit fees, as with previous years, because the Department received so few active system ground water remedial action permit related documents in CY 2023, there are minimal data available for determining staff hours to calculate the ground water - active system remedial action permit activity fees. The Department is using the staff hours for monitored natural attenuation ground water remedial action permit activities to calculate the ground water - active system remedial action permit activity fees for FY 2025.

The following table compares the calculated remedial action permit activity fees for FY 2025, and compares the remedial action permit activity fees for FY 2024 with the remedial action permit activity fees for FY 2025:

Comparison of FY 2024 and FY 2025 Remedial Action Permit Activity Fees

Remedial Action Permit Activity	FY 2024 Fee	FY 2025 Fee	Difference in Fee Between FY 2024 and FY 2025	Percent Difference in Fee Between FY 2024 and FY 2025
Soil Remedial Action Permits				
Remedial Action Permit Application	$1,430	$1,380	($50)	(3%)
Remedial Action Permit Modification	$1,320	$1,380	$60	5%
Remedial Action Permit Transfer	$550	$345	($205)	(37%)

Remedial Action Permit Activity	FY 2024 Fee	FY 2025 Fee	Difference in Fee Between FY 2024 and FY 2025	Percent Difference in Fee Between FY 2024 and FY 2025
Remedial Action Permit Termination	$1,100	$1,150	$50	5%
Ground Water - Natural Attenuation Remedial Action Permits				
Remedial Action Permit Application	$880	$805	($75)	(9%)
Remedial Action Permit Modification	$880	$690	($190)	(22%)
Remedial Action Permit Transfer	$440	$345	($95)	(22%)
Remedial Action Permit Termination	$550	$575	$25	5%
Ground Water - Active System Remedial Action Permits				
Remedial Action Permit Application	$880	$805	($75)	(9%)
Remedial Action Permit Modification	$880	$690	($190)	(22%)
Remedial Action Permit Transfer	$440	$345	($95)	(22%)
Remedial Action Permit Termination	$550	$575	$25	5%

Remedial Action Permit Annual Fees FY 2025

The remedial action permit annual fee is charged to each person who maintains a remedial action permit, after the remedial action permit is issued. This remedial action permit annual fee is also calculated by determining the number of hours required annually to administer the remedial action permits, multiplied by the average hourly rate of staff charged with administering these remedial action permits, including activities such as evaluating biennial protectiveness certifications.

As the following comparison of the type of remedial action permit and the number of staff hours required for FY 2024 and FY 2025 indicates, the number of staff hours between FY 2024 and FY 2025 decreased for two types of remedial action permits, and are unchanged for two types of remedial action permits:

Comparison of FY 2024 and FY 2025 Staff Hours for Remedial Action Permit Annual Fees

	FY 2024 Staff Hours	FY 2025 Staff Hours	Difference in Staff Hours Between FY 2024 and FY 2025
Type of Permit			
Soil Remedial Action Permit			
Deed notice with engineering controls	6	5	(1)
Deed notice without engineering controls	5	5	0
Ground Water Remedial Action Permit			
Natural Attenuation remedial action	6	6	0
Any other ground water remedial action	7	6	(1)

Based on the above staff hours, and the hourly rate of $115, the calculated remedial action permit annual fees for FY 2025 are as follows:

FY 2025 Staff Hours, Hourly Rate, and Remedial Action Permit Annual Fees

	FY 2025 Staff Hours	FY 2025 Hourly Rate	Calculated FY 2025 Annual Permit Fee
Type of Permit			
Soil Remedial Action Permit			
Deed notice with engineering controls	5	$115	$575
Deed notice without engineering controls	5	$115	$575
Ground Water Remedial Action Permit			
Natural Attenuation remedial action	6	$115	$690
Any other ground water remedial action	6	$115	$690

This increase is due to an increase in the hourly rate.

The following table provides a comparison of the FY 2024 staff hours, average staff hourly rate, and remedial action permit annual fees; the FY 2025 staff hours, average hourly rate and, calculated remedial action permit annual fees; and the difference between the FY 2024 and FY 2025 remedial action permit annual fees:

Comparison of FY 2024 and FY 2025 Remedial Action Permit Annual Fees

	FY 2024			FY 2025			Difference Between FY 2024 and FY 2025		
Type of Permit	**Staff Hours**	**Average Staff Hourly Rate**	**Remedial Action Permit Annual Fee**	**Staff Hours**	**Average Staff Hourly Rate**	**Remedial Action Permit Annual Fee**	**Staff Hours**	**Average Staff Hourly Rate**	**Remedial Action Permit Annual Fee**
Soil Remedial Action Permit									
Deed notice with engineering controls	6	$110	$660	5	$115	$575	(1)	$5	($85)
Deed notice without engineering controls	5	$110	$550	5	$115	$575	0	$5	$25
Ground Water Remedial Action Permit									
Natural Attenuation remedial action	6	$110	$660	6	$115	$690	0	$5	$30
Any other ground water remedial action	7	$110	$770	6	$115	$690	(1)	$5	($80)

Appendix A
Description of Areas of Concern Categories and Category Multipliers

Category	N.J.A.C. Citation	Category Description	Multiplier
1	7:26C-4.2(b)4i	Sites with zero or one contaminated areas of concern with no contaminated regulated USTs, that only contains historic fill (i.e., no other contaminated areas of concern). Sites where the number of contaminated areas of concern has not been determined based on the information known at the time the fee is to be calculated (for example, the preliminary assessment or site investigation has not been completed).	1 times the base fee
2	7:26C-4.2(b)4ii	Sites with 2 through 10 contaminated areas of concern. Sites with any number of contaminated regulated underground storage tank system areas, excluding unregulated heating oil tanks, provided there are no other contaminated areas of concern at the site. Example: If the site contains 15 regulated underground storage tank system areas and these were the only contaminated areas of concern at the site, the person would be subject to Category 2 fees. However, if this same site also had one other type of contaminated area of concern, the Department would consider the number of contaminated areas of concern at this site as 16, and the person would be subject to Category 3 fees.	2 times the base fee
3	7:26C-4.2(b)4iii	Sites with 11 through 20 contaminated areas of concern, at least one of which is a contaminated regulated underground storage tank area of concern. Site contains one or more sanitary landfills.	11 times the base fee
4	7:26C-4.2(b)4iv	Sites with more than 20 contaminated areas of concern. Sites where there are more than 20 contaminated areas of concern, at least one of which is a contaminated regulated UST area of concern.	22 times the base fee