

Handling Commingled LUST Sites Using the Online RBCA Application

Often, commingled LUST sites were combined into a single software file for both properties when using the RBCA software program. This file was submitted for both sites and two identical copies of the printed report were made, one for each site. In the “old” software, a file could be named anything in the “Site ID” field and could reflect the presence of data from two neighboring LUSTs.

The new online RBCA application uses database-type architecture and does not have “files” in the manner that would be produced by a program. This means that a single report (Tier 2 or SMR) cannot be attributed to multiple LUSTs automatically.

When data was uploaded to the new RBCA application for LUSTs that were/are part of a commingled site, two copies of the most recent software file were made; one with each LUST number (assuming there were two sites involved). Going forward, an online submission must be made for each LUST associated with a commingled site. The amount of additional work associated should be minimal and limited to entering the new sample data two times since copies of the most recent Tier 2 and SMR already exist for each LUST.

Please submit both a report in the RBCA application and a paper copy for each site of a commingled pair. Make note on the paper copies that the site is part of a commingled association. Additionally, please record in the “Description” field of the application report that the site is comingled. In accordance with previous policy, make justifications for site-specific monitoring plan modifications if necessary (i.e. if the two sites will not be using the same set of wells).

If you believe that a commingled site will reach NAR before RBCA software is no longer supported (i.e. after October 30, 2018), the option to complete the site(s) in the software remains viable; however, if the site is still at risk when the software is no longer optional, the CGP will be responsible for bringing the application files up to date.