



# RELEASE-BASED CLEANUP REGULATIONS

PRESENTED WINTER 2024

# ROADMAP

- ❖ Current State
- ❖ Benefits of the new program
- ❖ Overview of the Release Based Cleanup Program
- ❖ How does this new program compare to other states?
- ❖ Overview of the sections of the Release-Based Cleanup Regulations
- ❖ Next Steps







**CURRENT REGIME**



**FUTURE REFORM**

Slow Framework Deters Investment Interest



Proven, Release-Based Model is More Efficient

Overuses DEEP Resources



You Find It, You Spill It, You Clean It

Exempts Certain Properties From Oversight



Tiered Approach Tailors to Risk Level of Release

Stagnant Properties Do Not Help Environment

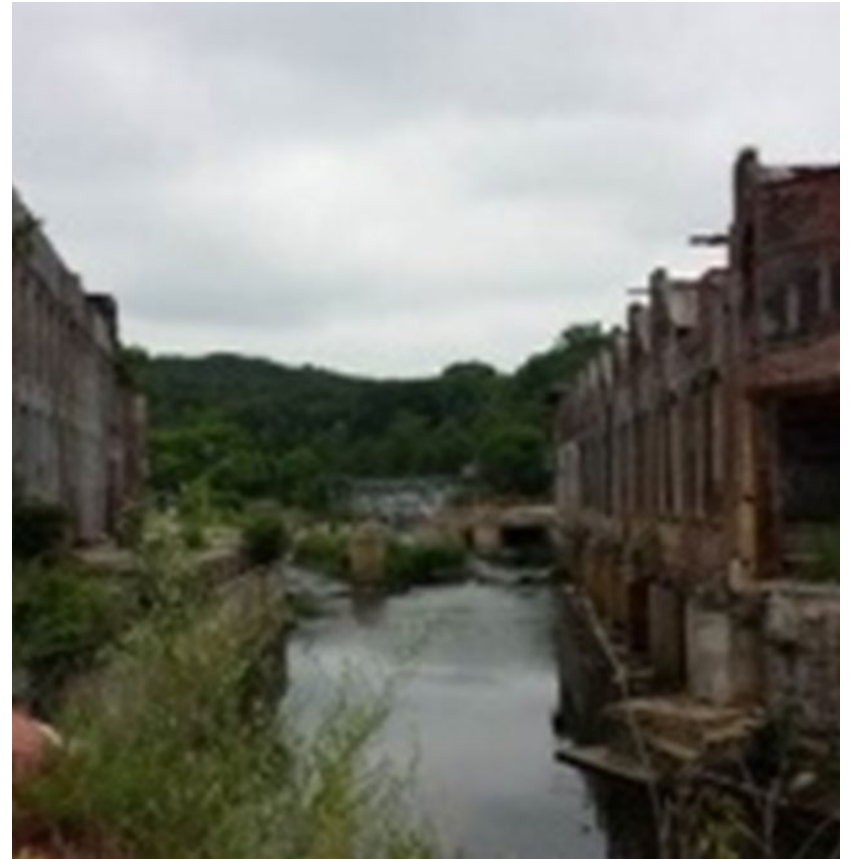


Increases Economic and Environmental Value

# CURRENT STATE: TRIGGERED UPON TRANSFER

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- ❖ Connecticut adopted the Property Transfer Act in 1985 and has amended it over 20 times since then
- ❖ Applies **only** to:
  - ❖ dry cleaners
  - ❖ auto body shops
  - ❖ furniture strippers
  - ❖ Generators of more than 100 kg of hazardous waste in a month
- ❖ Requires site-wide investigation of all areas that might have had releases (“proving the negative”)
- ❖ Applies to sales of real property *and* business operations
- ❖ Due to the numerous amendments, there are different requirements for sites based on the time of the transfer



# PROPERTY TRANSFER ACT

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- ❖ Does **not** require remediation of historical releases upon discovery, allowing pollution to spread
- ❖ Does **not** apply to historical releases on property not used for dry cleaners, furniture stripping, auto body repair, or from where hazardous waste was generated
- ❖ Does **not** apply to releases at parcels or businesses that do not transfer
- ❖ Usually requires environmental and legal research to determine if the Property Transfer Act applies
- ❖ Is a factor in sites being abandoned and becoming brownfields
- ❖ Complicates property transfers
- ❖ Time-consuming for Department staff to administer, with focus on administrative functions
- ❖ Confusing to out of state business owners and financial institutions



# FORMER NORTON PAPER MILL MILL COLCHESTER



Burned in July 2012  
Still not remediated





FORMER FLEISHER  
FINISHING  
MILL STREET  
WATERBURY



Burned in April 2012

Entered Cleanup  
Program 1993



City remediated &  
redeveloped in 2023 with  
state and federal funds



## FORMER COOPER INDUSTRIES BROOKLYN

Still not  
investigated or  
remediated

Entered Cleanup  
Program 1986







FORMER BRISTOL  
BABCOCK  
COMPANY  
WATERBURY



Entered Cleanup  
Program 1987



Burned in 2015  
Still not remediated

# CURRENT STATE: OTHER PROGRAMS

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- Significant Environmental Hazards – while requiring exposure to certain levels of pollution to be prevented, contamination may be mitigated and remain in place; administratively burdensome for staff and the public
- RCRA Corrective Action – federally-funded; applies only to certain hazardous waste generators
- Voluntary Remediation Programs (22a-133x & 22a-133y) – burdensome to administer
- Underground Storage Tank Program – federally-funded; applies only to regulated underground tanks
- PCB Program – federally-funded; inspection and enforcement program
- Release Reporting – new releases only, does not require remediation to RSR standards
- Brownfields Programs – ease remediation at sites that had not been addressed under other existing programs and are underused or abandoned



A stylized, colorful landscape illustration. At the top right, a bright yellow sun is partially visible. Below it, a large green hill with a dark blue outline dominates the middle ground. To the left, a smaller, lighter green hill is partially visible. At the bottom, a light blue area represents water, also outlined in dark blue. The overall style is simple and graphic.

## Overview of the RB Cleanup Program

# PROGRAMMATIC CHANGES WITH TRANSITION TO RELEASE-BASED PROGRAM

Existing Transfer Act obligations remain, new obligations will not be created

Brownfield programs will still require site-wide investigation and cleanup

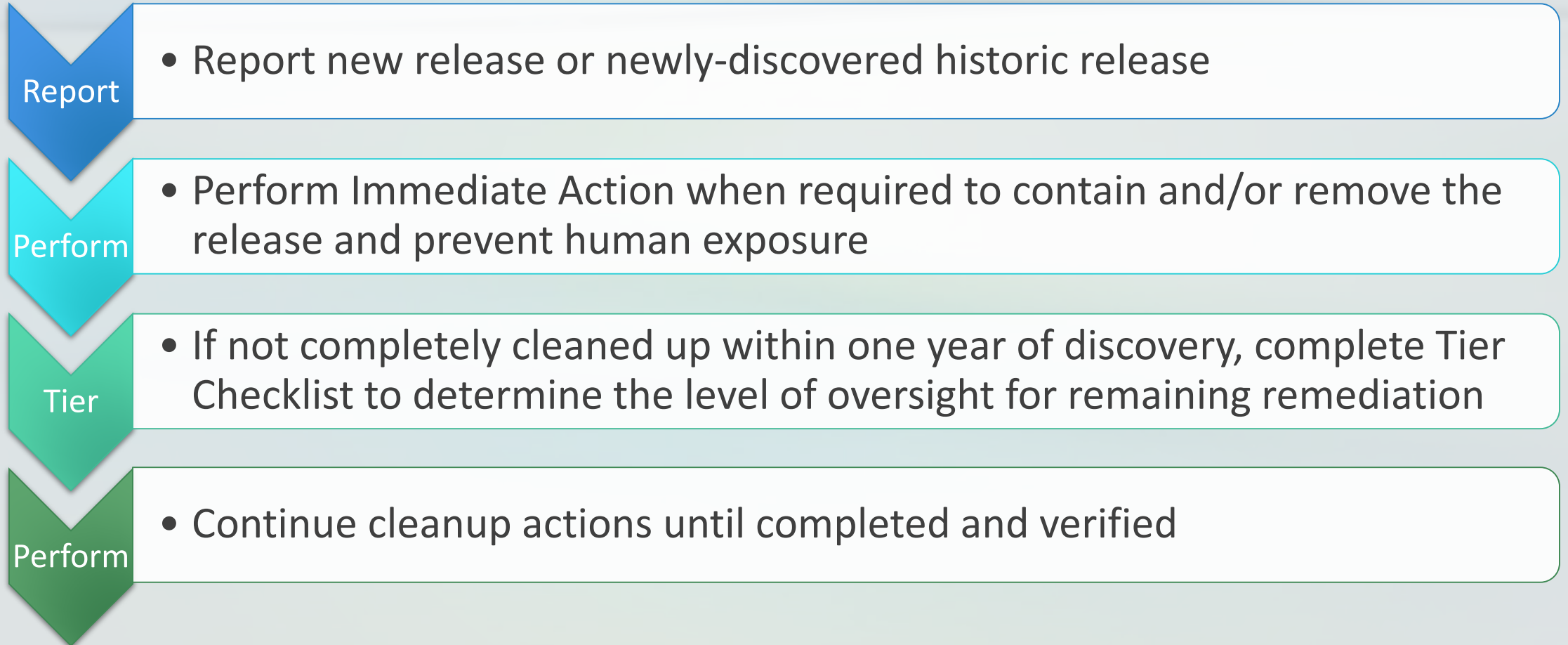
Voluntary parcel-wide investigation and cleanup option planned

Significant Environmental Hazard program will be sunset and incorporated into new regulations

Enforcement programs will remain – DEEP still can issue orders for investigation and cleanup



# RELEASE-BASED CLEANUP PROGRAM FRAMEWORK



# THE RELEASE-BASED CLEANUP PROGRAM WILL:

- ❖ Address all releases, regardless of how the release was discovered
- ❖ Ensure releases achieve unified cleanup standards
- ❖ Create new, more flexible options for completing remediation
- ❖ Create consistent documentation of remediation for all releases, including small ones
- ❖ Relieve small business owners and from "proving the negative" or paying to determine applicability of Property Transfer Act



# PROGRAM BENEFITS - EFFICIENCY

These programmatic tools will help reach an endpoint in a timely manner:

- ❖ “Walk-away” background baselines for naturally-occurring metals
- ❖ PEP provisions
- ❖ Permit by rule for managing Historically Impacted Material
- ❖ Permit by rule for managing soil under roads, parking lots, and buildings
- ❖ LEP implemented, risk-based DEC criteria (“short forms”)
- ❖ 120 days to cleanup historical releases before reporting (if below 2x RSR criteria, 1 year)

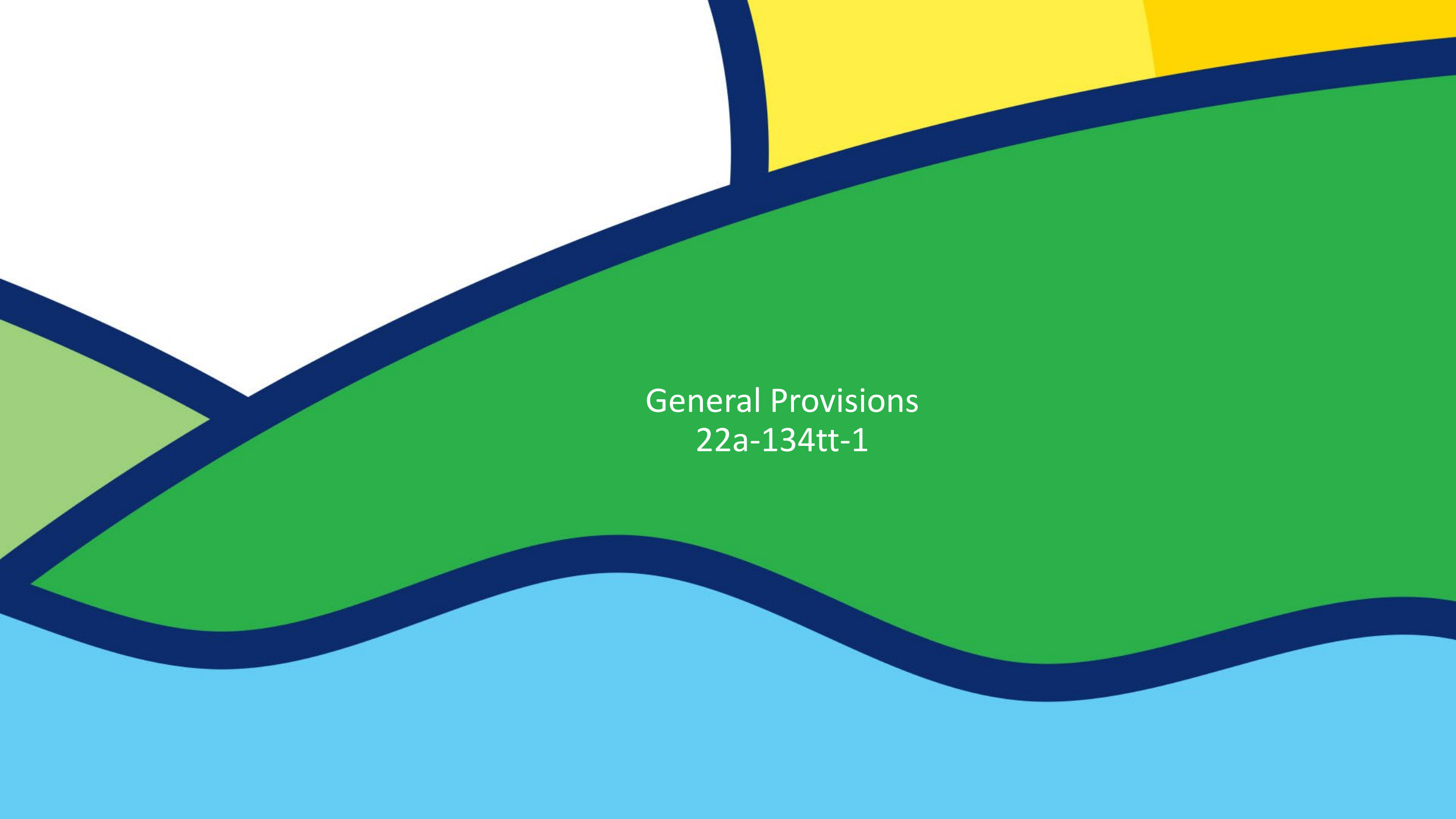
# BENCHMARKING AGAINST MASSACHUSETTS

	Release-Based Cleanup Program	Other States
Type of Program	CT is moving from a patchwork of cleanup regulations to a release-based system	CT is joining 48 other states that currently have release-based cleanup regulations
Fees	Less than MA; simpler in application and fewer actions that require fees	MA has annual fee based on tier; many one-time fees
Tiers	Tier assignments if a release is not cleaned up within one year of discovery. Tiers based on level of risk (Tier 1A, 1B, 2, 3)	MA tiers after one year of discovery based on complexity, number of sources, and how serious the threat potential contamination poses (Tier I or Tier II)
Level of oversight	Program puts the responsibility on the creator or maintainer to hire a LEP or PEP in most circumstances, though some releases will have DEEP involvement	MA relies on licensed spill contractors and licensed site professionals to oversee most cleanups, with DEP oversight as conditions warrant
Audits	Comprehensive audit process in regulations; audits performed on a percentage of release records that are certified by PEPs and verified by LEPs	MA has an audit program that evaluates documents throughout cleanup

A stylized, colorful landscape illustration. The top right corner features a bright yellow sun. Below it is a large green hill with a dark blue outline. The bottom of the image shows a light blue area representing water, also with a dark blue outline. The text "Overview of the Regulations" is centered on the green hill.

# Overview of the Regulations





General Provisions  
22a-134tt-1

# GENERAL PROVISIONS

## Definitions- Over 150 definitions, many from the RSRs

- **"Areal extent of a groundwater plume"** means the surface area beneath which groundwater is polluted by a release and in which one or more substances from such release or mobilized by such release is present at a concentration above the laboratory reporting limits.
- **"Certification"** means the rendering of a written opinion by a PEP on a form prescribed by the Commissioner that an investigation of the parcel has been performed in accordance with prevailing standards and guidelines and that the establishment has been remediated in accordance with the remediation standards.
- **"Emergent Reportable Release"** means a release to the land and waters of the state discovered by an observed change in conditions that is required to be reported by regulations adopted pursuant to section 22a-450 of the Connecticut General Statutes.
- **"Existing release"** means a release discovered through laboratory analysis of samples taken from the land and waters of the state.
- **"Permitted Environmental Professional" or "PEP"** means a person authorized by a permit issued pursuant to section 22a-454 of the Connecticut General Statutes to certify release records.
- **"Significant Existing Release"** means a release to the land and waters of the state discovered . . . that is present in the location identified, or creating one or more impacts to public health or the environment identified in section 22a-134tt-5(f).

# GENERAL PROVISIONS

## Requirements for Analytical Data

All analytical data used to comply with the regulations shall be scientifically valid and defensible, with a level of precision, accuracy, and sensitivity commensurate with its intended use. All submissions shall include an analytical data quality assessment and data usability evaluation prepared by individuals qualified to make such assessment or evaluation.

## Significant Existing Releases (SER)


Subsection lists 5 scenarios of existing releases that are considered significant

- Releases impacting drinking water wells
- Release of a substance within 500 feet of a private well at a concentration equal to or greater than the groundwater protection criteria
- Release in soil within 2 feet of surface with a substance at concentrations equal to or greater than 15x the direct exposure criteria
- Release of volatile organic substance or volatile petroleum substance to groundwater that is causing certain impacts
- Release of a substance equal to or greater than 10x the surface water protection criteria or of NAPL to groundwater within 500 ft of surface water

## Licensing of Permitted Environmental Professionals (PEP)

Discussed further in the PEP section of the presentation





Discovery of Existing Releases  
22a-134tt-2

# DISCOVERY OF EXISTING RELEASES

## Discovery of a Release by RP (MOST RELEASES)

Discovery of a release occurs when a person who created or is maintaining (RP; responsible party) a release has actual knowledge or constructive knowledge of such release.

- Actual knowledge of a release shall include lab analysis or observation of NAPL.
- Constructive knowledge is based on the reasonable person standard or multiple lines of evidence.

## Special Circumstances:

**Discovery of Significant Existing Release (SER)** - discovered when any person, taking into account any specialized knowledge or training, authorized or otherwise permitted by the RP to access a specific area for any purpose, obtains actual knowledge or constructive knowledge of a release requiring immediate action.

## Discovery by DEEP or others- Person who discovers required to notify RP

- If DEEP determines a release exists and notifies the RP, then the RP is deemed to have actual knowledge.

# DISCOVERY CONTINUED

**Discovery of Emergent Reportable Releases (ERR)** – any release required to be reported pursuant to the Release Reporting Regulations (RCSA §§ 22a-450-1 et seq) is considered discovered and subject to the RBCRs

## **Exceptions:**

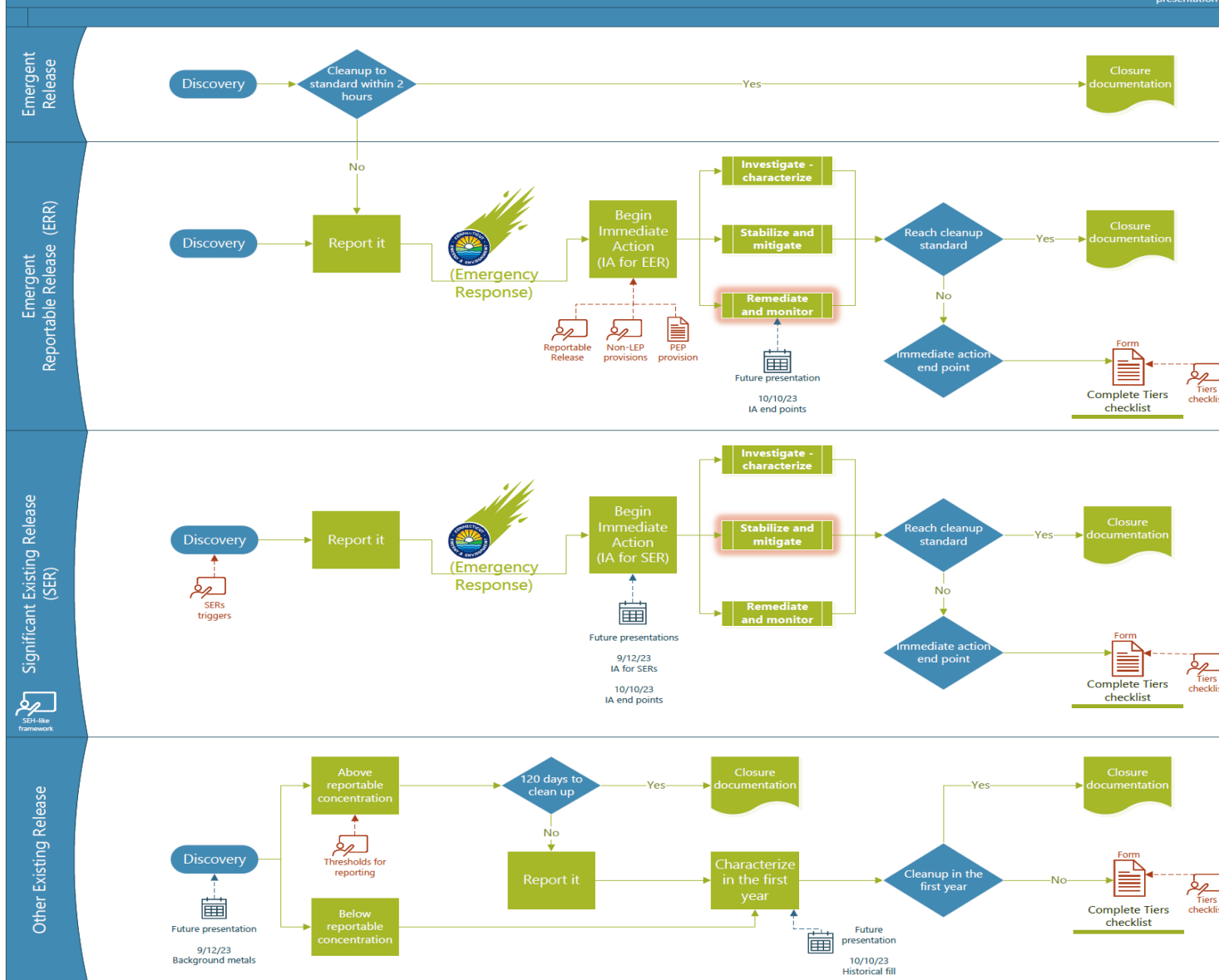
**Releases from Regulated Underground Storage Tank Systems-** the release shall not be considered to have been discovered for the purposes of this section.

## **Naturally Occurring Background Metals at the Time of Discovery**

- There are new default values for various metals found in Connecticut soils
- Metal Concentration  $\leq$  Natural Background = No release = no reporting and no tiering



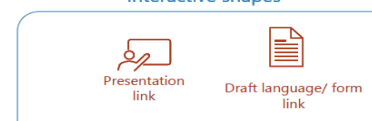
# Release-Based Cleanup Interactive Roadmap to the first year after discovery




### Flowchart shapes



### Interactive shapes





Reporting Newly Discovered Existing Releases  
22a-134tt-3

# REPORTING NEWLY DISCOVERED EXISTING RELEASES

## Report Required- Reporting timeframe based on level of risk

- Imminent Hazard – Shall be reported within the first two hours of discovery
- SER – Shall be reported within the first 72 hours of discovery
- Other releases – Shall be reported within 120 days\* of discovery
- Lesser releases – Shall be reported within 365 days\* of discovery if less than 2x applicable cleanup standard
- Reporting exemptions include releases required to be reported pursuant to the Release Reporting Regulations and incidental releases

\*releases remediated to the cleanup standards and verified by an LEP prior to 120 or 365 days do not need to be reported




# REPORTING NEWLY DISCOVERED EXISTING RELEASES

**Contents of Report** – described in the regulation and submitted on forms provided by the Commissioner.

**Reports of SERs by non-RP** - If the person who discovers a significant existing release (SER) has authorized access to the geographic area of the release, notify RP within one hour of discovery.

**Reports of Existing Releases at Transfer Act site**- Report the release under the RBCRs if the parcel is required to be investigated and remediated under the Transfer Act.

If already being investigated and remediated under the Transfer Act, and there is no immediate action required, report and specify whether remediation will occur pursuant to the RBCRs or the Transfer Act.



Characterization of Discovered Releases  
22a-134tt-4


# CHARACTERIZATION OF DISCOVERED RELEASES

## Requirement to Characterize Nature and Extent of a Release

- Determine the nature and extent of a release upon discovery. This characterization is necessary prior to determining the appropriate remedial action for an existing release and required to demonstrate satisfaction of the RBCRs.
- Characterization of a release requires developing a conceptual site model, which may include the following: topography of release area; chemical properties of substances; history of property; lab results
- Tier characterization of a release shall be completed as soon as practicable, but no later than 1 year after discovery.

## Prevailing Standards and Guidelines

- Methods or protocols posted on the Department's website shall be considered prevailing standards and guidelines.
- Methods or standards used for characterization other than those specified by the Commissioner must be submitted for review

The background features a stylized landscape with a yellow sun in the top right, green hills in the middle, and light blue water at the bottom. The elements are separated by thick, dark blue outlines.

# Immediate Actions

22a-134tt-5



# IMMEDIATE ACTIONS

## Immediate Action (IA) Required

- IAs are required:
  - For all new releases required to be reported pursuant to the Release Reporting Regulations (called Emergent Reportable Releases)
  - For all Significant Existing Releases (or “SERs,” the higher risk group of releases replacing the current SEH program)
- Certain, specified actions must be taken depending on the type of release and nearby receptors to quickly mitigate the release and prevent danger to human health
- IA considered complete when cleanup standard is achieved or IA transition-point is satisfied.

# IMMEDIATE ACTIONS

## Emergencies and Exigent Conditions

- Codifies the Department's current emergency response practices.
- Commissioner has discretion to consider ERR or SER an emergency or exigent condition and direct the response to the release.
- The Commissioner may retain a licensed spill contractor to perform address a release and recover costs and take enforcement action, including when the creator or maintainer fails to take action.
- The Commissioner's response may end at a point prior to achieving an IA endpoint or cleanup standard at which point the creator or maintainer would be responsible to continue required IAs.



Tiers  
22a-134tt-6

# TIERS



Completion of cleanup is required within 1 year of discovery or the release must be Tiered



If you have submitted a Release Remediation Closure Report within 1 year of discovery that documents compliance, you would not need to Tier.



Tiering oversight increases with risk.



Tiering is objective, clear cut, Yes or No.



# TIERS CHECKLIST

Checklist is a “Form prescribed by Commissioner.”

Checklist is a decision tree for evaluating work done within the first year and for subsequent tiering reevaluations.

LEPs must determine and verify the assignment to a Tier.

Appropriate, supporting documentation should accompany the checklist.

One checklist per release.

One source = one release.

Co-mingled releases: most stringent Tier would prevail.

DEEP Oversight means LEP work is overseen by DEEP, as is the case now.

# TIERS CHECKLIST

Tier 1A. DEEP Oversight	Tier 1B. LEP Oversight Receptor Risk	Tier 2. LEP Oversight Controlled Risk	Tier 3. Monitoring Oversight
<p>Highest-risk releases. DEEP lead. FEWEST cases. Unknown risks to receptors; programmatic noncompliance. Complete closure or re-tier 2 years after Discovery.</p>	<p>Known risk to receptors (drinking water, vapor) must still be addressed or scoping/screening eco not completed RAP not completed Complete closure or re-tier 3 years after Discovery</p>	<p>Controlled risk, no receptor pathways Complete closure or re-tier 5 years after Discovery</p>	<p>Monitored Natural Attenuation (MNA) only Complete closure or reevaluate effectiveness of MNA 6 years after Discovery</p>



## Part III: Tier Determination

### Tier 1A

Answer the following questions. Any box checked in the Tier 1A Indicator column at right designates the release as Tier 1A.

1. Receptors are known and documented

1a. A scoping level ecological risk assessment has been completed.

Yes

No

1b. A drinking water receptor survey has been completed.

Yes

No

1c. A vapor intrusion receptor survey has been completed.

Yes

No

2. Does/did the release require Immediate Action under **REF TBD**

No (Skip to line 3)

Yes (Proceed to 2a)

2a. Immediate Action requirements have been met

Yes

No


3. Tier characterization is complete.

Yes

No

**Tier 1A  
Indicator**

If any boxes in this column are checked, stop here. This release is Tier 1A. Otherwise proceed to Tier 1B determination.




General Cleanup Standards Provisions  
22a-134tt-7



# GENERAL CLEANUP STANDARDS PROVISIONS

**This section uses existing regulatory text from the RSRs**

- (a) Time-frames for issuance of approvals by the Commissioner
- (b) Environmental use restrictions
- (c) Financial assurance
- (d) Public participation (adjusted for new program)
- (e) Other requirements



Releases Certified as Closed by a Permitted Environmental  
Professional  
22a-134tt-8(a)

# KEY POINTS



- This section indicates who can attest that a cleanup has been completed.
- The following bolded terms are further defined within the regulations:
  - LEPs can **verify** the clean-up of all releases
  - PEPs can **certify** the clean-up of certain releases

# PEPs CAN CERTIFY A SUBSET OF EMERGENT REPORTABLE RELEASES UNDER THESE CONDITIONS:

- (A) The approximate location and volume of such release was known at the time remediation commenced;
- (B) The substance or substances are known;
- (C) The release:
  - (i) did not occur in or directly to a surface water body and has not migrated to surface water body; or**
  - (ii) occurred in or migrated to a surface water body, and each substance released is soluble or has a specific gravity of less than 1**
- (D) The release:
  - (i) consists of a substance or substances other than oil or petroleum and has not contacted groundwater; or**
  - (ii) consists only of oil or petroleum, is not within 500 feet of drinking water well, and has not caused a persistent impact to groundwater**
- (E) Remediation is commenced within the specified time, and all immediate actions required are completed in the specified time
- (F) Soil impacted by the release is removed and properly disposed; and
- (G) A PEP who responded to and directed the cleanup of such release certifies that each of the requirements has been satisfied.

## WAS THE RELEASE TO A SECONDARY CONTAINMENT SYSTEM?

A PEP can certify if the following conditions are met:

- The volume of the release is less than the volume the system was designed to contain; **-and-**
- The secondary containment system is not damaged



## DID THE RELEASE REACH SURFACE WATER?

A PEP can certify if the following conditions are met:

- It floats and you can scoop it up; **-or-**
- It's soluble





# HAS A RELEASE CONTACTED GROUNDWATER?

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A release shall be determined to have contacted groundwater if:

- Groundwater is encountered during excavating;
- The substance is detected in a groundwater well immediately downgradient of the approximate location of the release and not more than 5 feet from the edge of the excavation; **-or-**
- A substance(s) released is determined to be present in the groundwater using a method specified by the Commissioner

If the above are true and the release is anything other than oil or petroleum, a PEP **cannot** certify.



# HAS A RELEASE OF OIL OR PETROLEUM CAUSED PERSISTENT IMPACT TO GROUNDWATER?

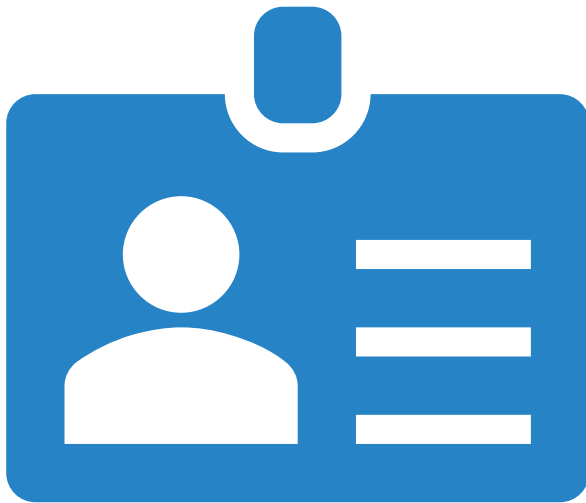
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A release shall be determined to have caused a persistent impact to groundwater if:

- A visible sheen remains on groundwater after three attempts within 24 hours at removing the sheen;
- One or more of the substances released is detected in a monitoring well immediately downgradient of the release and not more than 5 feet from the edge of the area of excavation 24 or more hours after completion of excavation of impacted soil; **-or-**
- A substance(s) released is determined to be present in the groundwater using a method specified by the Commissioner

If the above are true, groundwater has been persistently impacted by oil or petroleum and a PEP **cannot** certify.





# CREDENTIALS

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To determine if a license pursuant to 22a-454 can be issued, the commissioner shall consider:

- Training
- Experience
- Education
- Any additional credential or licenses





## SPECIAL PATH

- Applies to tanks that heat four or fewer residential units
- The responsible party is the homeowner
- Impacts are limited to inside the house and on-site soils
- Soil removal to the maximum extent prudent
  - Can leave impacted soils if residential footing would be threatened by removal
  - Closure report identifies pollution that remains
- Groundwater must be sampled if encountered
- Groundwater impact doesn't last more than 24 hours

# WHY RESIDENTIAL HEATING OIL?



Not all homeowner insurance policies cover heating fuel tank releases



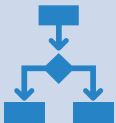
Currently, residential home heating fuel tanks are exempt from DEEP's UST Regulations.



DEEP is seeing an increase in releases from residential tanks as the tanks age



Residential home heating tanks do not have the same leak detection equipment as regulated tanks; therefore, releases are often discovered when homeowners have more frequent deliveries.



Heating oil contamination is well understood and biodegrades



There were over 477 residential oil tank releases reported to DEEP in 2023.

The background features a stylized landscape with a yellow sun in the top right, green hills in the middle, and light blue water at the bottom. The elements are separated by thick, dark blue wavy lines.

# Soil and Groundwater Cleanup Provisions 22a-134tt-9 and 22a-134tt-10



# CLEANUP STANDARDS FOR SOIL

- This section uses existing regulatory text from the RSRs
- Including soil criteria, DEC, PMC, variances and the other provisions previously in 22a-133k-2 (Relevant appendices are also being carried over from the RSRs)
- With the addition of **new provisions** :
  - **historically impacted material permit-by-rule**
  - **managing inaccessible soil under parking lots, roadways and buildings**
  - **two new exposure scenarios – managed multi-family residential and passive recreation**
  - **LEP implemented, risk-based alternative direct exposure criteria**

# ADDITIONS TO THE SOIL CLEANUP STANDARDS

## DIRECT EXPOSURE CRITERIA

### **Managed Multifamily Residential DEC**

A release may qualify if the parcel has more than 4 residential units and the parcel and residential units are managed by an association or professional property management company

Will require an EUR prohibiting the disturbance of soil by residents and active recreation without impervious cover

### **Passive Recreation Residential DEC**

Can be cleaned up to the passive recreation DEC if it is:

- (1) subjected to an EUR or
- (2) has a passive recreation conservation easement

Examples of passive recreation include: hiking trails, bike paths, horse trails

# USE OF PERMITS BY RULE

## HISTORICALLY IMPACTED MATERIAL

### Applicability

- Industrial/commercial sites only with confirmed presence of historically impacted material

### Notification

- A form prescribed by the Commissioner to notify the Department an owner is seeking cover under the permit by rule

### Requirements

- Maintain Industrial/Commercial use
- Cannot relocate historically impacted material parcel except as allowed by cleanup standards
- Notify any new owner or interest holder of the permit by rule
- Record an affidavit of facts on the land records
- Submit a closure report
- Conduct inspections every 5 years to demonstrate compliance

## MANAGING SOIL BENEATH PARKING LOTS, ROADS AND BUILDINGS

Inaccessible soil at a release area is not required to be remediated to the direct exposure criteria if the soil is located beneath concrete or bituminous concrete used for parking or vehicle travel or below a building foundation.

Similar administrative requirements as the historically impacted material permit by rule

- submit document to Commissioner that verifies compliance,
- record an affidavit of facts on the land records,
- inspect every 5 years and report to the Commissioner on condition of concrete


# CLEANUP STANDARDS FOR GROUNDWATER



**This section uses existing regulatory text from the RSRs**

- (a) Groundwater criteria
- (b) Alternative surface water protection criteria
- (c) Volatilization criteria
- (d) Groundwater protection criteria
- (e) Technical impracticability variance
- (f) Conditional exemption for incidental sources
- (g) Conditional exemption for groundwater polluted with pesticides
- (h) Applying the groundwater criteria
- (i) Additional polluting substances
- (j) Additional remediation of groundwater

**Relevant appendices are also being carried over from the RSRs**



Certification and Verification  
22a-134tt-11

# VERIFICATION AND CERTIFICATION

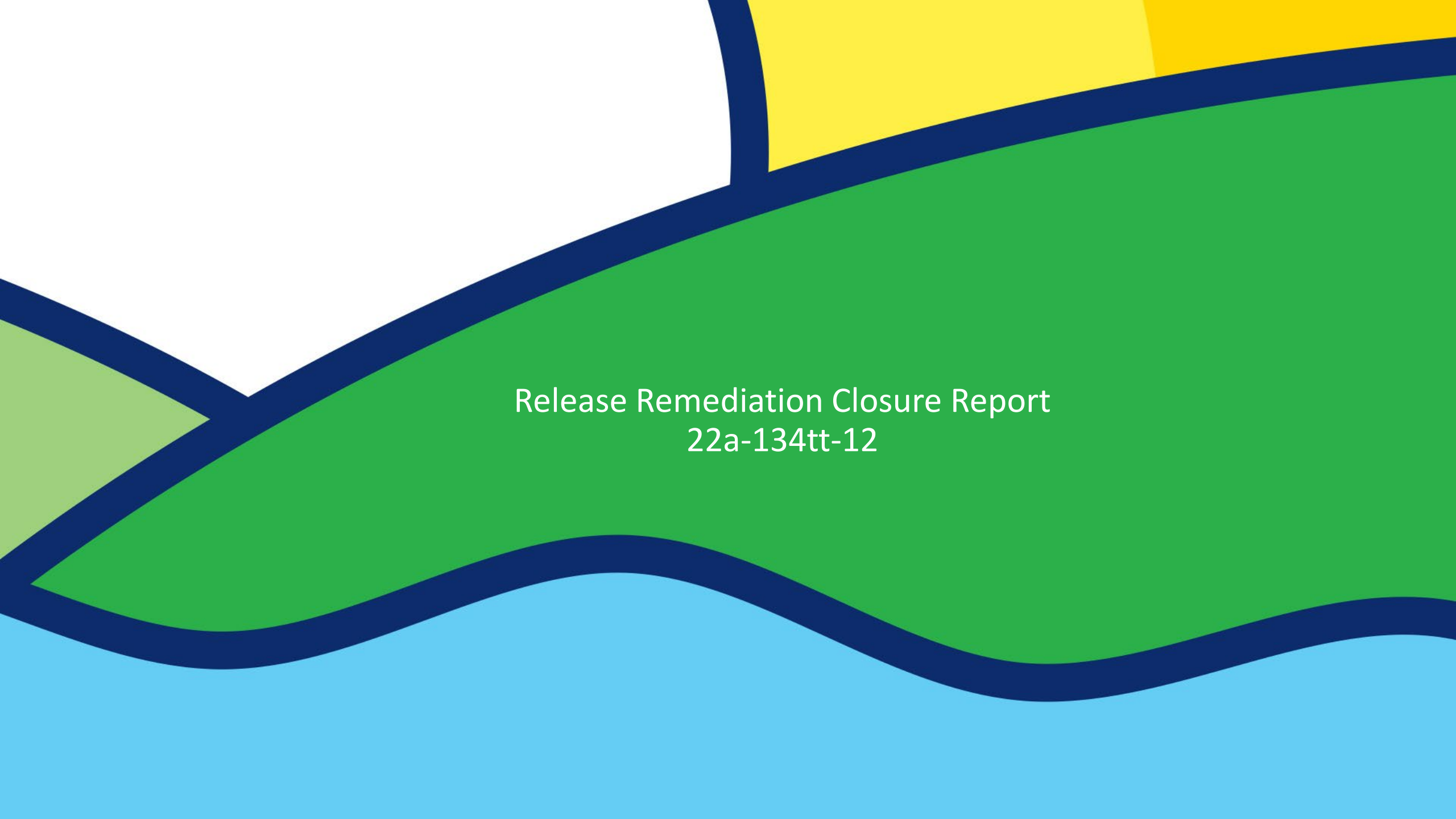
## *LEPs can verify*

- Immediate Action reports
- Tier assignment
- Changes in tier assignment
- Release remediation closure reports, except for the limited universe where certification is specified

## *PEP can certify or LEP can verify*

- Immediate Action reports generated as a result of an immediate action where certification is specified (RCSA § 22a-134tt-5(g))
- Release remediation closure report where certification is specified (RCSA § 22a-134tt-8)





Release Remediation Closure Report  
22a-134tt-12

# RELEASE REMEDIATION CLOSURE REPORT

Upon achieving applicable cleanup standards for a release, a release remediation closure report must be prepared and, in some circumstances, submitted to the Commissioner.

## Contents of the Report:

- Prepared on a form prescribed by the Commissioner
- Name, phone number, and email address of the creator/maintainer
- Location of release, including property address and GIS coordinates
- Date of discovery
- Date of reporting (if reporting was required)
- Date of first tier assignment (if tier assignment was required)
- Release records
- Remediation records
- LEP's verification or, for a small subset of releases, PEP's certification

Note: some reports will be retained and not submitted to DEEP



# WHAT TO DO WITH A RELEASE REMEDIATION CLOSURE REPORT

- Submit it to the commissioner, if:
  - The report is for an ERR;
  - The release was an existing release required to be reported;
  - For reports that were not required to be submitted to DEEP, within 30 days if the commissioner requests the report
- Creator/maintainer must retain the report for 10 years



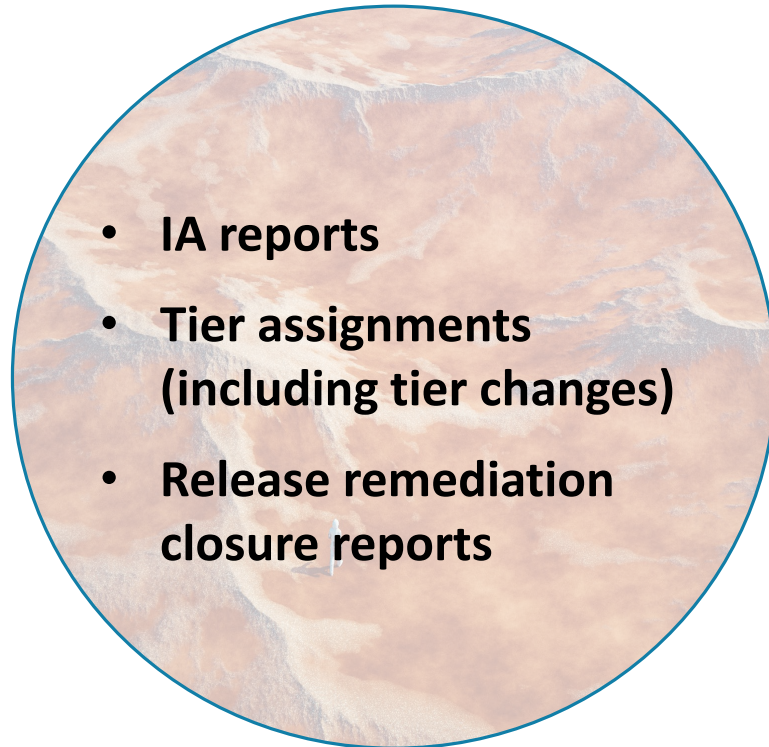


Audits  
22a-134tt-13

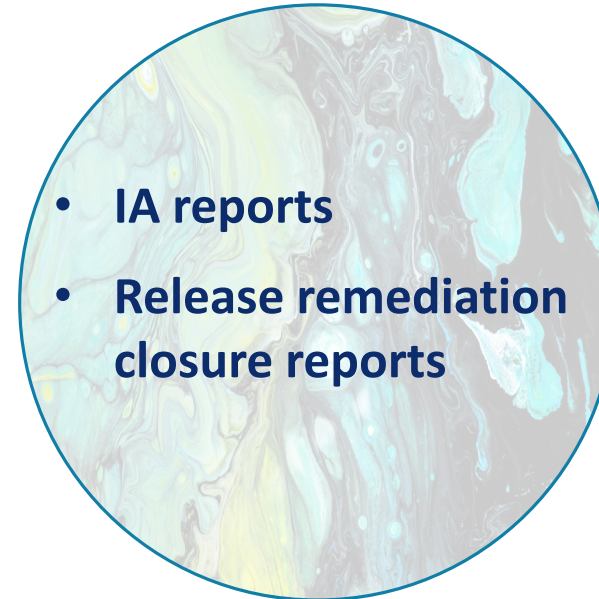
# WHAT CAN BE AUDITED?

Any release record can be audited

## LEP Verified Records

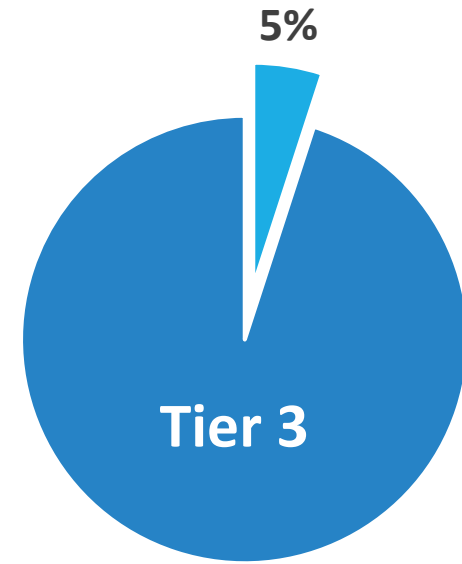
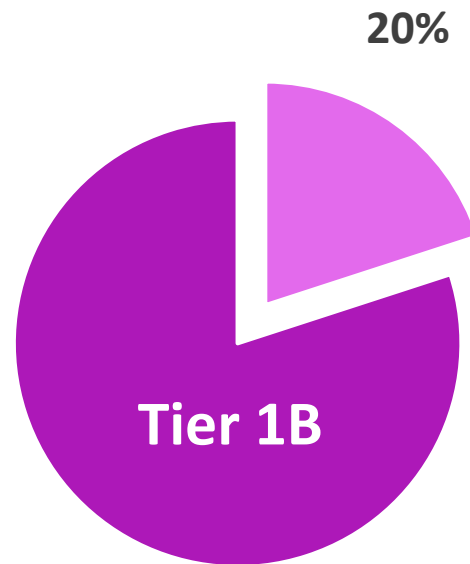
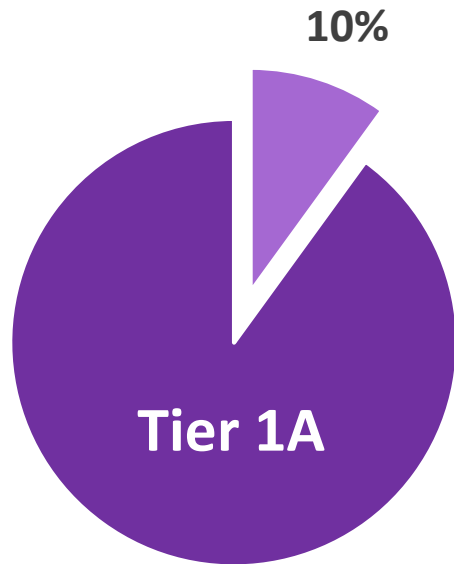


## PEP Certified Records



# FREQUENCY OF AUDITS

Goal is to conduct audits on a percentage of releases from each tier based on the initial tier assignment:





# TYPES OF AUDITS AND PROCESS

Type	What	Notice of Audit	Possible Outcomes	Timeline
<b>Screening</b>	Review of 1 release record	⊘	Accept (no written notice) Reject  ↻ Focused audit  ↻ Full audit*	Complete: 180 days
<b>Focused</b>	Review of 1 release record or issue identified during screening audit	☑	Accept Reject  ↻ Full audit*	Initiate: 180 days Complete: 18 mo.
<b>Full</b>	Review of any or all release records <b>AFTER</b> submission of a closure report	☑	Accept Reject	Initiate: 180 days** Complete: 2 yrs.

*\*A full audit may be initiated only after closure documentation has been received*

*\*\*Unless continued from a focused audit*

A stylized landscape illustration. The top right corner features a bright yellow sun. Below it is a large green hill with a dark blue outline. The bottom of the image shows a light blue area representing water, also with a dark blue outline. The text "Next Steps" is centered on the green hill.

Next Steps

# NEXT STEPS

Accept written comments until **February 6, 2024**;

Discuss these comments at two monthly working group meetings held on **February 13** and **March 12, 2024**; and

Post a notice of intent to adopt the RBCRs no earlier than **April 1, 2024**.





## Questions?

If you have questions after this presentation, send an email to [DEEP.Cleanup.Transform@ct.gov](mailto:DEEP.Cleanup.Transform@ct.gov)

More details on engaging with DEEP and the full set of regulations and supporting information can be found on [DEEP's Release-based Regulations webpage](#)