



**Department of Energy & Environmental Protection
Remediation Division
Roundtable
Q&A Newsletter
Vol. 20 ~ November 24, 2015**

Presented below are the Department's responses to verbal comments made at the Remediation Roundtable held on September 8, 2015. The comments and responses may have been edited for clarification purposes.

SELECTED VERBAL COMMENTS FROM THE SEPTEMBER 8, 2015 ROUNDTABLE:

UST Facilities Operational Compliance, Tank Closure, Release Response, and Corrective Action

Comment: Do you have a format or form for reporting a suspected release with the Department? Can members of the public get a copy of the report when it is submitted?

Response: *The Department does not have a prescribed form for reporting suspected releases. All suspected releases should be reported to the UST Enforcement Program at 860-424-3374. Any information submitted to the Department is available through the Freedom of Information Act.*

Comment: What constitutes a release? Does the detection need to be above RSR criteria?

Response: *If there is evidence that something left the tank system, then you have a reportable release regardless of concentrations.*

Wave 2 RSR and Risk Report Steps

Comment: Can we fix the Surface Water Protection Criteria for phenanthrene, since people often request an alternative criteria for the original error in the RSRs?

Response: *We are aware of the issue. We do not plan to change any criteria as a whole during this wave of amendments but will keep this under consideration.*

Comment: Will the new APS numbers that you are coming out with replace the 2008 draft RSR numbers? Or can they be used in addition to the 2008 numbers?

Response: *The anticipated 2015 numbers will be replacing the 2008 numbers.*

Keeping Child Care Centers SAFER

Comment: Are you applying the program to existing daycares or just new ones?

Response: *Both. However, most often we are involved when it is a new daycare opening, when a day care changes hands, or when an existing daycare is referred by a daycare licensing inspector.*

Comment: Would you apply the program at the yearly two-year licensing?

Response: *Just to clarify, daycare licenses are annual now, not every 2 years. There is no plan to make this a part of the license renewal process at this time; however, it is common to get referrals from inspectors who find a problem while the daycare is renewing their licenses.*

Comment: Do you plan to make this part of the initial licensing process?

Response: *It currently is. Applicants fill out questions for the SAFER program as part of the property history questionnaire with the licensing and relicensing application. If they do not fill it out, there is a chance we may miss it, but operators want to do the right thing and keep their kids and themselves safe.*

Comment: One can see how people who are hired by clients who are paying them to do the inspections may be reluctant to voluntarily contact DPH, since it may be considered as a conflict of interest for LEPs and attorneys.

Response: *DPH would expect the notification to come from the daycare operator, at which point DPH would ask for the Environmental Site Assessment.*

Comment: As an LEP, if I want to find out if there is daycare near my property, how can I find out that information?

Response: *If one cannot be identified visually, an environmental professional could contact the town, usually Planning and Zoning.*

Comment: Is there a DPH webpage with a list of daycares that have been evaluated?

Response: *No, but you may contact Sharee Rusnak at the Department of Public Health, sharee.rusnak@ct.gov, (860) 509-7583, and she would be able to tell you what sites have been evaluated.*

Comment: Will this become a regulatory process?

Response: *We did not want a regulatory program with prescriptive legislation like New Jersey's. We wanted to have control over it, and we have not had a problem with any daycare center not complying with our recommendations.*

Comment: It seems informal and not comprehensive /inclusive of all daycare facilities.

Response: *That is correct; it is not as comprehensive as it could be. We continue to refine how properties come through our program so we can broaden the scope.*

Significant Environmental Hazard Self-Implementation Guidance

Comment: Am I correct to interpret the changes presented in the Significant Environmental Hazard Presentation are new legislative changes?

Response: *Yes. The info presented at the Roundtable is based upon the legislative changes that went into effect on July 1, 2015.*

Comment: According to Rob Bell's presentation, one of the goals is for program unification. However, Significant Environmental Hazards is its own distinct program which seems contrary to what the Department had identified as a goal.

Response: *The Legislature established the Significant Hazard Statute to address short-term risk. We have other programs to address long-term risk. These short- and long-term risk programs often work hand in hand at a site. While the transformation proposal identified unification of programs, there would still need to be management of short-term risk and long-term risk due to the different exposure threats to human health and the environment presented by each scenario.*

Electronic Submittals

Comment: Is there any plan to make the documents that are submitted electronically available to the public online?

Response: *Our short-term plan is to provide the public with access to the documents through terminals located in the DEEP file room. The longer term plan is for an online webpage for status of documents of a particular site.*

Comment: Is there a receipt provided when you upload a document that a client can obtain for their records?

Response: *Currently there is not, which is why we are starting with monitoring reports.*

Comment: What if there are multiple REM IDs for the site?

Response: *You may select the REM ID you think is most appropriate for the work being conducted. On the transmittal form there will be in an area where you can list other possible REM IDs for the site.*

General Questions

Comment: What will the criteria be for inclusion on the CT Brownfields inventory?

Response: *We are still working on the list; however, as a first draft we are going to take a list of the sites that have received money from DECD or liability relief programs through DECD and ones that have been on the list designated by EPA. This first universe includes what is technically a definitive brownfield. We are going to list the source of the designation whether it is EPA or DECD.*

Comment: When are the Completion of Investigation deficiency letters going out?

Response: *They are going out currently.*

Comment: Will the letters be sent to the LEPs or the certifying parties?

Response: *Letters go to just the certifying party.*

Comment: I received a letter about an Engineered Control project and so did someone who hasn't been involved in the project for about 10 years, what can I do to provide the most up to date contact information?

Response: *You may contact Amanda Killeen from our Department at 860-424-3351, Amanda.killeen@ct.gov or Mike Senyk at 860-424-3782, mike.senyk@ct.gov for more information about the notice you received and any corrections that need to be made. Also a Roundtable presentation was made on November 18, 2014 regarding this topic. That presentation is on the [website](#).*