



**Department of Energy & Environmental Protection
Remediation Division
Remediation Roundtable
Q&A Newsletter
Vol. 32 /October 25, 2019**

Presented below are the Department's responses to comments made at the Remediation Roundtable held on June 18, 2019. The comments and responses may have been edited for clarification purposes.

Succession Planning and Division Goals:

Comment: Will the organizational chart and responsibilities of Staff be posted specifically?

Response: *A list of coordinators has been posted on our [website](#).*

Comment: For the PFAS plan of action, I recall hearing at a previous Roundtable that the Department was going to hire a professional consultant to work with the Department to develop a plan.

Response: *DEEP has not retained a consultant however, Anna Hagstrom, from Yale University, has been hired through a fellowship program with the Connecticut Academy of Science and Engineering to focus specifically on PFAS issues.*

Comment: Massachusetts is developing new standards as we speak, will CTDEEP?

Response: *Yes, we are aware of that and plan to evaluate the numeric criteria.*

Comment: Where do changes based upon public comments happen in the RSR promulgation process?

Response: *The Department will incorporate public comments after the hearing officer's report is produced, before the final wording goes to the Commissioner.*

Comment: With these proposed amendments to the RSRs, do you anticipate any cost savings?

Response: *Yes we anticipate the amended RSRs, if adopted, will provide for cost saving measures. There are more exits, more off ramps, more opportunities to achieve compliance in a quicker time frame. Additionally, the LEP can play a more prominent role to achieving compliance.*

Legislative Update: Bill SB1030 Property Transfer Law Amendments

Comment: So on those places where you need to have documentation of disposal within 90 days of shutting down lab or whatever, what kind of documentation are you anticipating and will there be guidance?

Response: *We are currently working on interpreting what the new Public Act requires and what documentation will be needed. The specifics are not complete as of yet; however, the Department intends to provide guidance in this regard.*

Comment: Visibly established at the time of removal? We can get a Phase I with a manifest from 10, 20 years ago? What are you looking at for timing on that piece?

Response: *If you have specific scenarios please bring them forward as suggestions. That part of the law takes effect as of October 1, 2019 so we have not developed specifics as of yet as to what those provisions will mean.*

Comment: If you have a site that had a filing made in the past that meets one of these new exemptions is there any way to get out of transfer act now?

Response: *No, you would still be required to bring this site through to verification for the historical filing. The statute is effective Oct 1 2019, and it is not retroactive.*

Comment: Do the audit time lines you presented only apply to final verifications or do they include form IV/interim verifications?

Response: *They apply to only final verifications.*

Comment: It seems like there's a lot of ambiguity in the public act. What is 'clearing out'? What if you move it out and move it back in? Definitions? From our stand point we would like to see DEEP provide some guidance for interpretation.

Response: *The workgroup is expected to discuss this issue.*

General Q&A:

Comment: Is the EUR process similar to the RSR Wave 2 process as far as the regulatory review process?

Response: *Yes, the review process is the same.*

Comment: Many people have been waiting for alternative criteria for PAHs and have been told they're working their way through the Department. Will some values be released with wave 2? If not, when?

Response: *PAHs in particular are waiting for technical support documents to be finalized. They are not tied to the RSRs, we are pushing to finalize them and put them online to be available as soon as possible.*

Comment: Are we talking months/years/etc. before they are expected?

Response: *We do not have a timeline to provide at this time.*