

Permitted Environmental Professional Training Course, Certification Examination and 3-year Refresher Course

DEEP is seeking entities to create a training program, certification examination and refresher course for permitted environmental professionals (PEP). PEPs are required to be on-site for the remediation of releases under the Release-Based Cleanup Regulations and must be retained when there is a release from an underground storage tank. The training course is required to cover topics related to understanding how the environment impacts responding to a release, understanding applicable Connecticut statutes and regulations, sampling protocols, and risk assessment. Detailed guidelines for the training course are provided below. All courses and exams developed will need to be submitted to DEEP for approval prior to being offered.

If you are looking to submit courses and exams for approval, please email DEEP.PEPenforcement@ct.gov with the following information. Submission deadline is **October 1, 2025**. Once approval has been provided, you can schedule your course training.

- Course name and description
- Course provider
- Outline of the course and all materials used for the course (including handouts, presentations)
- If the course is offered online or in person
- If the course is being offered on a single date, or series of dates (e.g., monthly or quarterly) or will be made available to take anytime
- If the course is online, provide access to the course for review
- If the course is being offered in person, include name of trainer(s), bios and credentials for each trainer for review and approval
- Provide all exam questions and answers

General Overview

- 8-hour training course
- 4-hour refresher training course after initial certification
- Training can be in-person or prerecorded– provider can determine how to structure course (i.e., modules, 2 4-hour sessions, etc.). Include methods of checking-in throughout the course (e.g., knowledge check or provide a code)
 - If person doesn't pass knowledge checks, retake module. Is there a way to ensure that the questions are different? Picked from a pool of questions
- Emphasis on scenarios as part of the coursework/exam
- Approval process for training course:
 - Submit the course and the exam, may require some back and forth

Certification Examination

- Offer exam online; link will be provided after completing training course
- With link exam can be taken within 5 days
- Receive certificate upon passage

- Exam process must be secure which could include requiring the taker keeps a camera on, authentication of the person taking the exam, etc.
 - Consider requiring as part of exam sign up that the taker verify they have the appropriate qualifications to be a PEP

3-year Refresher Course

- 4-hour refresher training
- Truncated review of the material covered in 8-hour course
- Knowledge check questions to test comprehension of material
- Takers must achieve 80% or greater passing rate

Topics for 1-day training course:

1. How the environment impacts release response: (est. 1.5 hours)
 - Understanding soil types, classification system/soil permeability
 - Chemical fate and transport - managing a release in a timely manner before it reaches the water table
 - Process to develop a plan to address a release
 - Then characterization occurs to determine the extent of the release (i.e. sampling, horizontal and vertical extent)
 - Surface water and solubility
2. Statutes and Regulations: (est. 2 hours)
 - Understanding CT regulations
 - RBCRs generally RCSA **22a-134tt-5** - Immediate Actions/Emergent Reportable Releases
 - Response is immediate, no later than 2 hrs after discovery
 - Action is required to meet cleanup standard
 - Required immediate action → (d)(1)(A) Removal from improved surface of the land and waters of the state and to directly from land and waters of the state
 - (d)(1)(B) Implementing measures to prevent migration of a release, which may include, but shall not be limited to, active remediation techniques or the use of physical barriers or appropriate treatment systems
 - 22a-134tt-5(e) and (j) Required Immediate Actions for an ERR
 - PEP will be identified in an immediate action plan
 - PEP responsibilities - **22a-134tt-8**
 - Evaluating whether a PEP can close a release (e.g., how many times the reporting limit is a PEP allowed to respond to)
 - PEP must know the substance – in the majority of scenarios, the substance will be understood. If not, how far can they investigate to determine the substance?
 - Primary knowledge – witness release or speak to witness of the release, someone with direct knowledge
 - Even just a label on a drum may not be accurate; further evaluate what is in the drum; location of drum
 - Is the release from an original container; intended use
 - Understanding PEP's limit of certification and when a LEP needs to get involved for verification (PEP/LEP response are parallel)
 - Responsibility of the RP to retain a LEP
 - The cleanup will continue, but the PEP may not necessarily be the one who certifies the cleanup

- 22a-134tt-5(g)(1) LEP verification required if release is determined to be a SER through lab analysis; causing persistent groundwater impact; cleanup standards require LEP verification
 - Persistent impacts to groundwater requires LEP
- Home heating fuel release caused by resident: Understanding when additional remediation is not practicable; such a determination may require PEP to consult with other professionals (e.g., structural engineers for home heating fuel) – it is up to the contractor to make this determination
- Home heating fuel release caused by oil provider: they have an obligation to go further (with owner's consent); this can include in-situ remediation
- Spill Cleanup Contractor 22a-454 permit requirements
- RSRs: general overview including pollutant mobility criteria and direct exposure criteria; understanding which criteria are applicable
 - Any ERR must be cleaned up to background or complete removal of release
- RRR: what is a reportable release;
- UST (106-corrective action and 107-closure)
 - Owner and operator must retain a PEP when there is a confirmed release
- PCBs: 22a-134tt-5(e)
 - (3) if a release is an emergent reportable release that is discovered in soil:
 - (B) Notwithstanding the requirements of subparagraph (A) of this subsection, if such release contains PCBs, remediate or dispose of such soil in the manner required by 40 CFR 761 or as directed by the commissioner, not more than 48 hours after discovery.

3. Additional topics:

- Risk Assessment (est. 1 hour)
 - Training would cover recognizing potential contaminants in soil, such as heavy metals, pesticides, PCBs, and petroleum hydrocarbons.
 - Understanding the potential risks associated with these contaminants, including human health and environmental impacts.
 - Familiarity with regulations like RCRA requirements for handling hazardous waste.
- Sampling and Analysis (est. 1.5 hours)
 - **Proper Sampling Techniques:** Training would emphasize techniques for collecting representative soil samples, ensuring no cross-contamination of the samples and the sampling equipment.
 - **Sample Handling and Storage:** Proper protocols for storing and transporting collected soil samples to prevent cross-contamination and degradation. Chain of custody and proper documentation
 - **Analytical Methods:** Knowledge of various analytical methods used to identify and quantify contaminants in soil samples.
- Administrative (est. 1 hour)
 - Administrative components of 22a-454 permit
 - Auditing process – described in regulations 22a-134tt-13
 - REACT – case management system