

**POLICY ON
SUPPLEMENTAL
ENVIRONMENTAL PROJECTS**
Department of Energy and Environmental Protection
Commissioner Katie S. Dykes



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Introduction

In the settlement of an environmental enforcement case, the Connecticut Department of Energy and Environmental Protection (“Department”) will require the alleged violator to achieve and maintain compliance with State environmental laws and regulations and to pay a civil penalty. To further the Department’s goals to protect and enhance public health and the environment, in certain instances one or more environmentally beneficial projects, or Supplemental Environmental Projects (“SEP”), may be included in the settlement, pursuant to CGS Chapter 439, Section 22a-16a. The term “Supplemental Environmental Project” refers to a project that may serve in addition to or in lieu of a civil penalty as the basis for the consensual settlement of an enforcement case. The following is a statement of policy by which the Department will consider exercising its discretion to accept an SEP as part of the settlement of an administrative enforcement case. The Department believes that these projects provide useful environmental benefits beyond what can be secured solely through administrative orders. They can be particularly useful in promoting pollution prevention, restoration of threatened and ecologically significant resources and habitats, and furthering environmental equity.

Commissioner’s Discretion

The ultimate decision as to the settlement of an administrative enforcement case rests within the sound discretion of the Commissioner of the Department or the Commissioner’s designee. The policies and procedures in this document are intended solely to help guide employees of the Department. They are not intended to, nor do they, constitute rulemaking for the Department and may not be relied upon to create a right or a benefit, substantive or procedural, enforceable at law or in equity, by any person. The Department may take an action that deviates from the policies or procedures contained in this document if the Commissioner considers it appropriate in a specific case.

A. Eligibility Criteria for SEPs

A judgment as to the appropriateness of an SEP in a particular case generally will be made in accordance with the following criteria:

1. No Potential for Further Damage to Environment from SEP

SEPs will be allowed only when the Department is satisfied that the SEP could not cause additional damage to the environment or to public health or safety, even if it is done poorly or if left uncompleted at any time during implementation.

2. Planned, Completed, or Required Activities

An SEP will not be allowed for projects that the respondent has already completed or that the respondent already intends to do or is likely to do. Since the primary purpose of this Policy is to obtain environmental or public health benefits that may not have occurred “but for” the settlement, projects that have been started before the Department has identified a violation, or before the Department has initiated resolution discussions with the respondent, are not eligible as SEPs.

However, the Department is more likely to adjust the initial penalty calculation downward in instances in which a respondent has demonstrated good faith, such as the lack of recalcitrance, no history of other violations, lesser severity of the violations, or shorter duration of the violations.

An SEP will also not be allowed for activities that the respondent is already legally obligated to perform. Under some circumstances, an SEP may provide for accelerated compliance through which a significant environmental benefit is achieved substantially sooner than is otherwise required by law (see “Pollution Reduction Projects” below).

3. Relationship to Civil Penalty

An SEP generally should not totally displace a civil penalty amount, which is important for several reasons. A civil penalty is still usually necessary to ensure that the Department’s enforcement actions are effective in deterring future violations by this respondent and others in the regulated community. Civil penalties help to ensure a level playing field so that violators do not obtain an unfair economic advantage over their competitors who made the necessary expenditures to comply in the first place. Civil penalties encourage companies to adopt pollution prevention and recycling techniques, so that they minimize their pollutant discharges and reduce their potential liabilities. Civil penalties can also be used to benefit the communities that have been affected by the violation. Accordingly, a settlement of a case that warrants a civil penalty under the Department’s Enforcement Response Policy should include a monetary penalty, calculated according to the Department’s Civil Penalty Policy, which is set at a level that captures the respondent’s economic benefit for non-compliance and an appreciable portion of the gravity component of the penalty.

The degree to which the gravity component of the civil penalty should be adjusted to reflect the cost of the SEP is left to the discretion of the Department. The Department will deem the cost of a proposed SEP to be its projected cost after taxes. The respondent will be required in the consent order to agree that it will not seek or take any federal or state tax deduction, credit, or benefit from the SEP. The Department will require the respondent (and generally an independent Certified Public Accountant on behalf of the respondent) to calculate the net present after-tax value of the project and certify under penalty of law (And CGS Sections 22a-6 and 53a-157 make a knowing false statement criminally actionable) that this calculation is accurate.

Under the following circumstances, the Department may allow an SEP constituting a 100%, dollar-for-dollar civil penalty offset: (1) the proposed SEP constitutes a pollution prevention or pollution reduction/waste minimization project or an environmental enhancement project; (2) the respondent’s compliance history does not suggest a practice or pattern of non-compliance with environmental laws; and (3) the proposed civil penalty does not exceed fifteen thousand dollars (\$15,000).

The Department may also consider full civil penalty mitigation by means of an SEP when the respondent is an agency, board, commission, council or department of the state, a municipality, or a non-profit organization. These circumstances allow the use of SEP

funds to benefit impacted communities. However, if the proposed SEP does not meet the above listed 100% dollar for dollar penalty offset circumstances, the proposed SEP can constitute no more than 50% of the calculated civil penalty amount.

4. Availability of Resources

The Department must consider the availability of staff and fiscal resources in deciding whether to accept an SEP:

- a) The estimated amount of time and resources required for effective negotiating and drafting of SEP provisions in a consent order and administrative oversight of SEP implementation is an extremely important criterion to use in determining whether to include the SEP in a settlement. In addition, in deciding whether to allow an SEP or in determining the form of an SEP, the Department must consider the impact of the SEP on its own programs. An otherwise eligible SEP may not be allowed if it is inconsistent with any of the Department's ongoing programs or if it would impose an unacceptable or burdensome staffing or fiscal constraint on a program.
- b) The Department will also consider whether the respondent has the technical and economic resources needed to successfully complete the SEP and will not allow the SEP to be included in a settlement unless the respondent has those resources. In an appropriate case, the respondent may hire outside technical help for the proposed SEP.

5. Available Only if Violations and Pollution Corrected

An SEP may be considered only if violations and all pollution created or threatened by the violations are fully corrected and abated or will be fully corrected and abated in a timely manner under an enforceable consent order. A respondent will not be given additional time to correct the violation or pollution and return the site/facility to compliance in exchange for conducting an SEP.

6. Relationship to Violation ("Nexus" Requirement)

Generally, an SEP will be approved if the Commissioner determines there is a direct and appropriate relationship ("direct nexus") between the nature of the violation(s) and the environmental benefits to be derived from the SEP. To constitute a direct nexus SEP, the SEP must: (i) improve the environment injured by the violation; (ii) reduce the total risk posed to public health or the environment by the violation; (iii) result in the restoration of natural or man-made environments from the actual or potential damage resulting from the violation; or (iv) protect natural environments from actual or potential damage resulting from the violation. The Department prefers SEPs with a direct nexus.

An "indirect nexus" SEP is an SEP consistent with this policy that substantially furthers the Department's statutory mission or reduces the likelihood of future violations similar to those at issue. If an SEP with a direct nexus cannot be developed or is not prudent, the Commissioner may approve an SEP that either furthers the Department's statutory mission or reduces the likelihood of future violations similar to those at issue.

7. Initiation

The proposal to include an SEP in a settlement may be initiated by either the respondent or, with the approval of the program bureau chief, by the Department. The burden of developing the SEP and persuading the staff of its benefits and likelihood of success is the responsibility of the respondent. An SEP proposal may be made at any time during an enforcement action, although the Department should consider both the status of the action and the resources that have been committed to it before deciding whether to accept an SEP.

8. Compliance History

The respondent's compliance history and capacity to successfully and promptly complete the project must be examined during evaluation of a proposed SEP. A respondent who is a repeat offender is a less appropriate candidate for an SEP than a first-time offender, since a repeat offender has already demonstrated an inability or unwillingness to meet environmental requirements.

9. Third Party Oversight

SEPs may require third-party oversight. In such cases, these oversight costs should be solely borne by the respondent. The respondent must agree as a part of the settlement to pay for an independent, third-party auditor acceptable to the Department to monitor the status of the SEP. In certain cases (e.g., inland wetland violations), it may be appropriate for another governmental agency to oversee implementation of the SEP if such oversight is acceptable to the Department. The consent order or enforcement mechanism shall specify and describe the details of the party undertaking oversight responsibilities. The respondent will be required by the settlement to ensure that the auditor submits detailed periodic reports directly to the Department, including a final report evaluating the success or failure of the SEP.

10. Compliance with SEP

The consent order shall specify time-specific milestones to be met in implementing the SEP, including a completion date. If the respondent does not comply satisfactorily with the terms of the SEP, they shall be liable for the amount by which the assessed penalty was reduced, with interest, plus an additional ten per cent charge to cover the administrative costs incurred by the Department in reviewing and approving the failed SEP. The consent order must contain a mechanism for assuring prompt payment, e.g., through stipulated additional penalties for non-payment of the amount of the penalty reduction or the posting of a letter of credit or other acceptable financial security (in the amount by which the assessed penalty was reduced) to be forfeited if the SEP is not fully implemented as approved. Financial security is particularly appropriate when the staff thinks that the respondent might use an SEP commitment to delay the payment of a penalty until after the respondent places its assets out of reach or dissolves.

11. Main Beneficiary of SEP

The Department's interest in considering SEPs is to ameliorate the adverse public health and/or environmental impacts of violations. Projects are not intended to reward respondents for undertaking activities that are in their economic self-interest (e.g.,

updating or modernizing a plant to become more competitive). Therefore, an SEP will not be approved when the respondent, rather than the public, is likely to receive a substantial share of the benefits of the SEP. However, an otherwise eligible SEP will not be disapproved simply because it contains ultimate economic benefits to the respondent. Indeed, a legitimate purpose of an SEP may be to provide economic incentives to prevent pollution. If the Department believes that a respondent may get a significant economic benefit from a proposed SEP, the respondent must demonstrate to the Department's satisfaction that (1) they would not undertake the project without the additional incentive of including it in the enforcement settlement, and (2) the public health and environmental benefits to be derived from the SEP are substantial and that the public interest would be best served by providing this additional incentive.

12. Benefit to the Department's Programs

SEPs shall not be used for the primary purpose of obtaining additional departmental resources that are capable of being obtained through ordinary legislative or administrative means (e.g., hiring staff or buying equipment). However, to reduce the administrative costs to the Department for managing SEP's in excess of \$100,000, the Department may use up to ten percent of the project's value to administer the project, including for the purpose of managing contractors procured to implement the project. Furthermore, an otherwise eligible SEP will not be disallowed simply because it has the incidental effect of supplementing the Department's resources (e.g., respondent funding an environmental enhancement project that is consistent with the goals of a program but beyond the ability of the Department to fund or perform, and which meets the other criteria in this policy).

B. Categories of Eligible SEPs

Ten categories of SEPs will be considered, subject to meeting the criteria described in preceding sections. Projects that positively impact communities where environmental equity may be an issue are preferred. For all categories of eligible SEPs, if the respondent disseminates publicity regarding its funding of the SEP, the respondent shall include a statement that such funding is in partial settlement of an enforcement action brought by the Commissioner.

1. Pollution Prevention Projects

A pollution prevention project reduces or prevents the generation or creation of pollutants through source reduction and best management practices.

For purposes of this policy, "source reduction" is any practice that reduces the amount of hazardous substance, pollutant or contaminant that enters any waste stream or is otherwise released into the environment prior to recycling, storage, treatment, or disposal. Source reduction may include equipment or technological modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, inventory control, or other operation and maintenance procedures, including the proper, licensed application of pesticides.

Pollution prevention also includes any project that protects natural resources through conservation or increased efficiency in the use of energy, water, or other materials. “Closed loop processes”, wherein waste materials produced during a manufacturing process are returned directly to production as raw materials on site, are a type of pollution prevention.

Low Impact Development (LID) techniques are another type of pollution prevention project and an alternate comprehensive best management approach to storm water management. LID refers to systems and practices that use or mimic natural processes that result in the infiltration, evapotranspiration, or use of storm water to protect water quality and associated aquatic habitat. There are many practices that have been used to adhere to these principles such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.¹

In all cases, for a project to constitute pollution prevention, there must be an overall decrease in the amount and/or toxicity of pollution released to the environment, not merely an equivalent transfer of pollution to other media.

2. Pollution Reduction/Waste Minimization Projects

A pollution reduction/waste minimization project is one that goes substantially beyond compliance with environmental legal requirements to further reduce the amount of pollution that would otherwise be discharged into the environment. The distinction between pollution prevention and pollution reduction/waste minimization is that the former is addressed to a change in the generation of pollutants as part of the industrial process; whereas the latter is addressed solely at a reduction in the level of pollutants at the point of discharge or emission (e.g., end of pipe). Under some circumstances, an acceptable pollution reduction project may encompass an accelerated compliance schedule, under which the respondent would significantly reduce pollution by complying with an existing or proposed statutory or regulatory requirement substantially sooner than is required by law. Such “accelerated compliance” projects are not allowable, however, if the regulation or statute provides a benefit (e.g., a higher emission limit) to the respondent for early compliance.

Waste minimization projects may include solid waste recycling and source reduction activities that reduce the amount of solid waste generated above and beyond the levels required by state or local law. DEEP encourages projects with a focus on supporting municipalities and their efforts to significantly increase reuse, recycling rates including waste organics diversion.

¹ For more information on Pollution Prevention: <https://portal.ct.gov/DEEP/P2/Industry/Pollution-Prevention-for-Business>. For more information on LID: <https://portal.ct.gov/DEEP/Water/Watershed-Management/Low-Impact-Development-and-Green-Infrastructure-Municipal-Outreach>. <http://www.epa.gov/polluted-runoff-nonpoint-source-pollution/urban-runoff-low-impact-development>.

3. Public Health Projects

A public health project provides diagnostic, preventative, and/or remedial components of human health that are related to the actual or potential damage to human health caused by the violation. Such projects may include, but are not limited to, exposures from the misapplication of pesticides, illegal abatement of asbestos or lead paint, handling and storage of hazardous waste, and drinking water analysis and treatment. Projects may include environmental sampling, epidemiological data collection and analysis, medical examinations of potentially affected persons, collection and analysis of blood/fluid/tissue samples, medical treatment, and rehabilitation therapy.

Public health SEPs are acceptable only where the primary benefit of the project is to the population that was harmed or put at risk by the violations.

4. Environmental Restoration and Protection Projects

An environmental enhancement project is a project that goes beyond repairing the damage done to the environment because of the violation and enhances the environment in the vicinity of the harm caused by the violation. These projects may be used to restore or protect natural environments (such as ecosystems) and man-made environments, such as facilities and buildings, that are geographically removed from the violation. Included in this category is any project that protects the ecosystem from degradation or improves the overall condition of the ecosystem.

Regarding human-made environments, such projects may involve the remediation of facilities and buildings, provided such activities are not otherwise legally required. This includes the removal/mitigation of contaminated materials, such as soils, asbestos, and leaded paint, which are a continuing source of releases and/or threat to individuals, if this work is not otherwise required by law.

5. Environmental Assessment and Auditing Projects

An environmental auditing project may constitute an acceptable SEP. The following general considerations should be taken into account. First, environmental auditing that simply represents general good business practice is not acceptable under this policy. Second, the Department has the authority to unilaterally order a respondent to perform environmental audits when, given the facts of the case and the compliance history of the respondent, the Department deems the audits necessary to assure continued compliance. Staff should talk to the Department's legal counsel in cases where such a requirement in an enforcement action is deemed appropriate. Third, an environmental auditing project may be considered as an SEP if the respondent undertakes additional auditing practices, above and beyond those designed to correct existing management and/or environmental practice deficiencies that appear to be contributing to recurring or potential violations at the facility at issue and at other facilities owned or operated by the same respondent. Fourth, audits are acceptable as SEPs only when the respondent is a small business or government entity.² Lastly, these assessments and audits are acceptable as SEPs only

² For purposes of this policy, a small business is one that employs 100 or fewer individuals. Government entities are state departments and agencies, municipalities, or other political subdivisions of the state, consistent with US EPA's *Small Business Compliance Policy* revised April 11, 2000.

when the respondent agrees to provide the Department with a copy of the audit or assessment results certified under penalty of law.

There are five types of projects in this category:

- a) **Pollution prevention assessments** are systematic, internal reviews of specific processes and operations designed to identify and provide information about opportunities to reduce the use, production, and generation of toxic and hazardous materials and other wastes.
- b) **Site assessments** are investigations of the condition of the environment at a site or of the environment impacted by a site, and/or investigations of threats to human health or the environment relating to a site. A site assessment of an appropriate site other than the site where the subject violation occurred may constitute an approvable SEP. Site assessments include, but are not limited to, investigations of levels and/or sources of contamination in any environmental media at a site; investigations of discharges or emissions of pollutants at a site, whether from active operations or through passive transport mechanisms; ecological surveys relating to a site; natural resource damage assessment; and risk assessments. To be eligible for SEPs, such assessments must be conducted in accordance with prevailing standards and guidelines, if available, applicable to the type of assessment to be undertaken.
- c) An **environmental management system audit** is an independent evaluation of a party's environmental policies, practices, and controls. Such an evaluation may encompass:
 - 1) A formal corporate environmental compliance policy, and procedures for implementation of that policy;
 - 2) Educational and training programs for employees;
 - 3) Equipment purchase, operation, and maintenance programs;
 - 4) Environmental compliance officer programs;
 - 5) Budgeting and planning systems for environmental compliance;
 - 6) Monitoring, record keeping, and reporting systems;
 - 7) In-plant and community emergency plans;
 - 8) Internal communications and control systems; and
 - 9) Hazard identification with risk assessment.
- d) An **environmental compliance audit** is an independent evaluation of a respondent's compliance status with environmental requirements. The value of an environmental compliance audit for purposes of penalty mitigation under this policy is limited to the costs associated with conducting the audit. While the SEP should require all violations discovered by the audit to be promptly corrected, no credit is given for remedying the violation since people are required to achieve and maintain compliance with environmental requirements.
- e) An **energy audit** is an independent evaluation of a respondent's facility-wide energy consumption identifying recommendations for energy reductions. The value of an energy audit for purposes of penalty mitigation under this policy is

limited to the costs associated with conducting the audit and the costs of implementation that exceed a five-year return on investment.

6. Enforcement-Related Environmental Public Awareness Projects

These projects are defined as publications, broadcasts, or seminars that underscore for the regulated community the importance of complying with environmental laws or disseminate technical information about the means of complying with environmental laws. For example, permissible public awareness projects may include sponsoring and funding industry-wide seminars directly related to correcting widespread or prevalent violations within an industry, a media campaign to discourage others from similar violations, or a series of public service announcements describing how violations were corrected at a facility using innovative technology and how similar facilities could also implement these production changes. Educational seminars or activities that provide awareness of environmental issues, such as climate change, sustainability, recycling, or natural resources, can also be considered as public awareness projects. Such projects must be related to the type of violations which are/were the subject of the enforcement action and should benefit the community in which the violation occurred. Outreach to elected officials and neighborhood leadership can be used to determine how the community might benefit from this education.

Respondents who fund or implement a public awareness project must also agree to publicly state in a prominent manner that the project was undertaken as part of the settlement of an action brought by the Department.

7. Emergency Planning and Preparedness Projects

An emergency planning and preparedness project provides assistance -- such as computers and software, communication systems, chemical emission detection and inactivation equipment, HAZMAT equipment, or training -- to a responsible local emergency response or planning entity. This is to enable these organizations to fulfill their obligations under the Emergency Planning and Community Right-to-Know Act to collect information to assess the dangers of hazardous chemicals present at facilities within their jurisdiction, to develop emergency response plans, to train emergency response personnel, and to better respond to chemical spills.

8. Environmental Justice Projects

Since 1993, it has been the Department's written policy that no segment of the population should, because of racial or economic makeup, bear a disproportionate share of the risks and consequences of environmental pollution or be denied equal access to environmental benefits. The Department is committed to incorporating environmental equity into its policy making and its regulatory activities.

Environmental Justice SEPs benefit and provide improvement to the Environmental Justice Community, as defined in CGS 22a-20a, in which the violation occurred. This should be done through public engagement and outreach that may include a Community Benefit Agreement, mutually agreed to by the respondent, the elected officials or director of public health, and community members. These projects may include, but are not

limited to, improvements to town parks, school yards, and cemeteries; urban forestry; improving accessibility to natural areas within the community; assistance in improving waste management/reduction; and funding for environmental health education projects through the local health departments.

9. Climate Change Adaptation/Resiliency Projects

These projects provide measures to increase the resiliency of communities to extreme weather events. These projects should enhance a community's ability to adapt, be more resilient and/or more sustainable in response to the effects of climate change, sea level rise and energy use/power generation. Such projects could include:

- a) **Renewable energy projects** that reduce reliance on fossil fuels, increase solar and energy storage or harden\protect existing electrical transmission infrastructure.
- b) **Stormwater treatment measures**, green infrastructure, and updated conveyance structures that reduce flooding and accelerated erosion by improving municipal stormwater management infrastructure, such as storm sewers, drains, flood control reservoirs, rain gardens, or other low-impact development/nature-based solutions.
- c) Implementation of **living shorelines**, wetland creation/restoration areas, and other nature-based measures to protect coastal and riverine areas from adverse impacts associated with sea level rise, accelerated erosion, and increased flooding.
- d) Municipal, regional, and state-wide **“Smart” planning/zoning/development** updating efforts, flooding vulnerability assessments, and energy/transportation infrastructure resiliency evaluations.
- e) **Mitigation of urban heat islands** by the strategic planting of trees and vegetation to shade impervious areas, increase evapotranspiration and reduce runoff.
- f) **New infrastructure** to support electric vehicle usage and improvements to mass transit systems.

10. Indirect Nexus Projects

An indirect nexus SEP is one that substantially furthers the Department's statutory mission or reduces the likelihood of future violations. Examples of SEPs with an adequate indirect nexus include, in no particular order, the following:

- Purchase of open space for a not-for-profit third party (e.g., Nature Conservancy, local land trusts) to protect natural resources, preserve scenic landscapes and historical resources, or offer public recreational opportunities;
- Funding development of greenway corridors, or open space that: (1) may protect natural resources, preserve scenic landscapes and historical resources or offer opportunities for recreation or non-motorized transportation; (2) may connect existing protected areas and provide access to the outdoors; or (3) may be a greenspace along a highway or around a village by a municipality or not-for-

profit third party;

- Funding research projects relating to environmental protection or conservation of natural resources at a site other than that at which the violation took place;
- Provide a suitable fishway to a dam or other artificial obstruction;
- Fish and wildlife habitat restoration;
- Wetlands restoration;
- Funding a household hazardous waste collection day;
- Funding activities that educate children and families in environmental and energy matters across the scope of the Department's mission as well as provide for a greater appreciation of our natural resources and outdoor recreational opportunities and promote healthy minds and bodies;
- Funding a not-for-profit third party (e.g., a local land trust) to develop stewardship plans for managing and protecting critical habitats on protected open space;
- Funding Low Impact Development, solid waste recycling, or source reduction measures within a municipality;
- Funding energy efficiency measures within a municipality;
- Funding activities that reduce the emissions of greenhouse gases above and beyond any underlying regulatory requirement; and
- Funding planning and implementation activities that promote more resilient communities in the face of a changing climate.

The preceding categories give general guidance for the exercise of discretion, and a given SEP is not necessarily disqualified because it does not fit perfectly within the definition of any one of them.

The following types of projects will not be allowed:

- Cash or donations to communities or any political party;
- General public education or projects;
- Contributions to educational institutions;
- Unrelated to environmental protection;
- Studies or assessments that do not address the problem at hand;
- Provide only raw materials;
- Incomplete projects; and
- A study performed for the benefit of the respondent, unless there is a corresponding commitment in the consent order to promptly carry out the results of the study (e.g., pollution prevention measures) upon approval by the Department, and the purpose of the

study falls within one of the categories of acceptable SEPs discussed in this policy. In such cases, the mechanism creating the SEP must dictate that if the results are not implemented, the penalty reduction would be automatically rescinded and the penalty would have to be paid in full, with interest, plus an additional ten percent charge to cover the administrative costs incurred by the Department in reviewing and approving the failed SEP.

C. Level of Approval

Although this policy is intended to be used by all staff, an SEP requires the specific approval of the Commissioner or relevant Deputy Commissioner.

To use staff time efficiently, Department personnel should first take the SEP proposal to the program's bureau chief. Bureau chief approval is required before staff can propose an SEP to a respondent. The ultimate decision, however, rests with the Commissioner or Deputy Commissioner, and it is staff's responsibility during negotiations to inform the respondent of that fact.

Please contact the Director of the Office of Innovative Partnerships & Planning at DEEP.Concierge@ct.gov with any questions.