

Dear Working Group Members:

I hope everyone is enjoying the (very hot) start of summer. Now that the dust from the legislative session is starting to settle, the Department has turned its focus to the implementation of the release-based cleanup program. I write to provide a couple of updates:

1. PA 25-54 has kept intact the current membership of this Working Group until March 1, 2026 but has changed the frequency with which we will meet to quarterly. The last working group meetings were in the second quarter of this year, so we plan to meet again in the third quarter. Keeping with our usual schedule, this meeting will be held Tuesday September 9, 2025 at 1:00. The agenda will likely include updates on REACT, PEP permitting, guidance, and outreach. More information on meeting location and the agenda will be provided in advance of that meeting.
2. The Department is working to implement the licensing of Permitted Environmental Professionals (PEPs). Attached, please find a proposed list of qualifications and training requirements for PEPs. The Department has shared its thinking on this subject, and has requested feedback and comments from the working group on qualifications and training which have been incorporated into this draft. As a result, the attached draft is nearly final. However, one additional opportunity for comment will be provided, and we request that any final comments be provided no later than July 21, 2025. Please submit any comments to DEEP.Cleanup.Transform@ct.gov.

I hope everyone enjoys the rest of the summer, and I look forward to seeing you at the working group meeting in September.

Best,
Emma

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PEP Qualifications and Training

Experience:

A minimum of 10 years of experience (within the last 15 years) in responding to hazardous materials incidents involving mitigation and/or remedial activities associated with spills and releases including but not limited to releases from underground storage tanks; experience in planning remedial activities; knowledge of chemical fate and transport and soil classification; competency in the use of emergency equipment and emergency procedures, spill response equipment, and mitigation, containment, and removal techniques.

Education:

- Up to 4 years of experience may be substituted with a bachelor's degree in a relevant subject of study (biology, chemistry, earth science, geology/hydrogeology, environmental science, or other related environmental field)
- Up to 2 years of experience may be substituted for an associates degree in a relevant subject of study (biology, chemistry, earth science, geology/hydrogeology, environmental science, or other related environmental field)

Training:

- OSHA 1910.120
- OSHA 30
- ICS 100, 200 and 700 (incident command system)
- Third-party 8-hour training course that covers topics related to understanding how the environment impacts spill response, risk assessment, sampling and analysis, CT regulations and statutes, responsibilities of a PEP,
- Pass certification exam at the end of training course

Certification duration: 3 years

Continuing Education:

- Annually, OSHA 8-hour refresher
- Every 3 years, take a 4-hour refresher of the training course and pass questions throughout the course