



Draft Proposed Program Outline for a Transformed Cleanup Program

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I. Message to Stakeholders

This document is being released to encourage discussion among stakeholders and between stakeholders and the Department of Energy and Environmental Protection (DEEP). DEEP is offering this document as an outline for the future unified cleanup program. Inclusion of ideas and concept in this document is based on significant stakeholder input and feedback since early 2011. Past documents and feedback can be found by visiting the Cleanup Transformation website (www.ct.gov/deep/remediation-transform) and selecting the Transformation Materials page. DEEP hopes that significant comments will be submitted in response to this document, so that DEEP can further refine the framework for a transformed cleanup program that will serve to establish a more efficient, streamlined and result-oriented approach to cleanup in Connecticut.

II. General

The Department of Energy and Environmental Protection (DEEP) proposes to modify the current approach to the cleanup of pollution in Connecticut to achieve remediation of more pollution in Connecticut. This proposal is based on a stakeholder process that has been on-going since January 2011 and is intended to align degree of effort with the likely risk to public health and the environment.

In Connecticut, the cleanup authority primarily consists of statutes located within Title 22a of the Connecticut General Statutes (CGS), and associated regulations. The current obligations require reporting releases and addressing the resulting pollution through various authorities. There are also additional requirements, independent of reported releases, that relates to certain properties and any release or releases that may exist on such land (e.g., the Property Transfer Act). DEEP acknowledges that the current system – with some pollution being addressed on a release basis and some on a property-wide basis – creates confusion and is not efficient. More importantly, DEEP acknowledges that if the State is to move to a true release-based cleanup system, the regulations that govern cleanup (the Remediation Standard Regulations or RSRs) must be practical and achievable.

The program will be described in statute, with certain provisions detailed by regulation.

III. Release Reporting

A central goal of the Cleanup Transformation is to unify Connecticut's various cleanup laws. One unifying feature is a single entrance to the cleanup program. To achieve this, DEEP proposes a release reporting framework that covers certain releases regardless of the date of release. Some releases would be reportable but only require release response, such as releases to secondary containment or to the interior of a building, where no impact to the environment occurs.

Release reporting will be based on the discovery or knowledge of a release or a potential release. In addition, reporting requirements will be triggered based on quantities of a substance released, type of a substance released, and discovery of pollution above certain thresholds in soil, sediment, water or air.

The following definitions are proposed for stakeholder consideration.

a. Definitions

Release means any discharge, spillage, uncontrolled loss, seepage or filtration of oil or petroleum or chemical liquids or solid, liquid or gaseous products, including but not limited to, hazardous substances, hazardous waste, waste oil, used oil, petroleum constituents, asbestos, radioactive material, pesticide, prohibited pesticide, restricted use pesticide, or polychlorinated biphenyls, but does not include appropriate application of pesticide and herbicides, discharges permitted by the Commissioner, and other releases that do not pose a risk to human health or the environment. *DEEP is seeking input from stakeholders on this definition.*

Reportable Quantity is a term that will apply to certain new releases to provide a quantity below which reporting of a release will not be required. *DEEP is seeking input from stakeholders on this definition.*

Reportable Concentration is a term that will apply to all releases where the reportable quantity is indeterminable for any reason and where a substance is detected in soil, sediment, water or air. If pollution is detected below these thresholds and the party can reasonably expect that they have determined the maximum degree of a release, reporting of a release will not be required. *DEEP is seeking input from stakeholders on this definition.*

Reportable Release means a release of a substance that was released in excess of the reportable quantity or a detection of a substance in soil, sediment, water or air in excess of the reportable concentration.

Owner of Property means any owner of real property.

Operator of Equipment means any operator of any vessel, vehicle, motor vehicle, rolling stock, aircraft or other equipment.

Operator of a Facility means any person responsible for or owner of any building, structure, installation, equipment, pipe or pipeline, well, pit, pond, lagoon, impoundment, ditch, landfill, storage container.

Other Responsible Party means any person that is responsible for a release at a property or owner of a property at the time the release occurred.

Response Personnel mean any public official, including but not limited to, police and fire personnel, DEEP responders or other personnel who becomes aware of a Reportable Release in the conduct of their duties.

Technical Environmental Professional means anyone, including a Licensed Environmental Professional, who conducts environmental investigations and/or cleanup, and who may be directly employed or retained as a consultant by a public or private employer.

Responsible Party means any party that is required to report a release.

b. Applicability

The following parties are required to report to DEEP reportable releases under the following circumstances.

Owners of property must report any reportable release to DEEP that initiated on or impacted their property if:

- such release is in excess of the reportable quantity,
- the reportable quantity for such release is reasonably indeterminable,
- such release contains substances in excess of the reportable concentration, or
- the nature and extent of such release is unknown and such release may contain substances in concentrations in excess of a reportable concentration.

****** In the case where an owner of a property reports a reportable release that has impacted their property that was the result of an upgradient release or a release from equipment owned and operated by other (i.e., transformers), the owner will not be obligated to address such release under this program.******

Operators of equipment must report any reportable release to DEEP if such release originated from their equipment regardless of the cause.

Operators of a facility must report any reportable release to DEEP if:

- such release is in excess of the reportable quantity and was caused by or emanating from their facility,
- the reportable quantity for such release caused by or emanating from their facility is reasonably indeterminable, or
- such release contains any substances present in excess of a reportable concentration and such release can reasonably be expected to have been caused by or emanated from their facility.

Other responsible parties must report any reportable release to DEEP if:

- such release was caused by the party and was released in excess of the reportable quantity, or
- such release contains substances in excess of the reportable concentration.

Technical environmental professionals must:

- inform their client of the client's responsibility to report to DEEP if a reportable release is discovered in the course of investigating their client's property.

c. Complaints

If DEEP receives a report of a release from a party not associated with the release (i.e., not the subject property owner, operator of equipment), DEEP may investigate such reported release. However, such report does not create an obligation for any other party to act. If DEEP confirms such release and determines that the release was a reportable release, DEEP will report such release and DEEP will attempt to determine the party responsible for reporting such release. If the responsible party is identified, DEEP will inform them of their responsibilities to report such release and take appropriate action.

IV. Release Response Overview

Responsible Parties are required to immediately undertake actions warranted to investigate, abate and remediate releases and submit required documentation to DEEP. Unless DEEP directs the release response, Responsible Parties must utilize appropriately trained or licensed personnel, as the case may require, to direct the investigation, release abate and remediation. If a Responsible Party fails to initiate an appropriate release response, DEEP may conduct the response and may seek cost recovery for such response, in accordance with Connecticut General Statutes.

Not all reported releases will trigger a requirement for the responsible party to comply with each provision of this program, as outlined herein. For example, certain releases that do not reach the environment will be able to reach an early exit with an appropriate release response. In addition, many new or minor releases will be able to reach an early exit and responsible parties will not be obligated to conduct further investigation or cleanup.

a. Oversight

Once a release has been reported to DEEP, DEEP staff may choose at any time to inspect the release area to determine the accuracy of the release reporting, collect split or confirmation samples, or direct on-going action by the responsible party. Absent direct DEEP direction, each responsible party shall ensure that releases are investigated and abated by personnel with appropriate experience, training and expertise for the given release.

Release Response by DEEP

DEEP staff may choose to direct the release response upon receiving a release report. This involvement would be for one of three reasons. First, the release poses a high risk to public health, sensitive land uses, or sensitive environments. Second, the party reporting the release has not shown through their action that they are addressing the release appropriately or in a timely manner. Third, DEEP believes that additional assistance can expedite the release response and reduce costs for certain parties (e.g.,

homeowners, small businesses or small municipalities. In this third case, DEEP assistance will be based on available resources.

In any case where DEEP directs the release response, any action taken by or approved by DEEP will be certified by DEEP to satisfy the requirements of law. While the responsible party is always obligated to submit a release response report that summarizes the work completed and states the status of the release, DEEP may complete such report, if it deems appropriate.

Oversight by Environmental Professionals

The responsible party will be required to utilize personnel with the appropriate experience, training and expertise for the given release. Some businesses may have trained staff who will be able to address small releases where the duration and extent of the release is known. In other cases, professionals licensed to respond to releases or perform environmental investigations and oversee cleanups will need to be utilized to address larger releases, releases of certain substances, or historical releases where little is known about the release.

b. Immediately Required Response Actions

In the course of responding to a release, the responsible party and the party responsible for responding to such release shall immediately perform the following actions, as conditions may warrant;

- 1) Report any fire or explosion hazard or serious injury to 911;
- 2) Report any release of extremely hazardous substance as defined by and in accordance with Connecticut General Statutes section 22a-609;
- 3) Cease and contain an ongoing release or potential release;
- 4) Mitigate and remove airborne hazards caused by the release ;
- 5) Recover free product released to containment;
- 6) Mitigate and secure any compromised containers; and
- 7) Initiate recovery of free product released to the environment.

c. Exposure Abatement or Early Program Exits

Responsible parties will be required to either abate actual or likely high-risk exposures or reach the early program exit. In the event that an early exit is not feasible and the release has impacted the environment, the responsible party will be required to conduct remediation sufficient to achieve a Class A, B or C exit, as discussed herein.

High-Risk Exposures

Responsible parties must immediately take action to determine if a reported release has caused or contributed to, or has likely caused or contributed to any of the following high-risk exposures:

- 1) Pollution in a public or private drinking water well, or pollution to groundwater within 500 feet of a public or private drinking water well.
- 2) Polluted soil within one foot of the surface that is at or above ten times the direct exposure criteria as specified in the Remediation Standard Regulations that is applicable to the current land use of the property.
- 3) Pollution to groundwater adjacent to or beneath a building that contains substances that may pose a risk to indoor air quality.
- 4) Polluted groundwater that discharges to a surface water body that may pose a risk to human health or an unacceptable risk to aquatic life.

If any high-risk exposures are determined to exist, the responsible party shall immediately take action to abate such risk. Abatement of such risk can be accomplished through remediation of the release to a degree that no longer poses a risk to the potential receptor. Alternatively, the responsible party can limit the exposure pathway. An example would be controlling access to polluted surficial soil through appropriate fencing and notifications until further remediation can occur or providing alternative sources of drinking water until polluted groundwater is remediated.

Contained Release Early Exit

Certain releases will not be released to the environment (i.e., no substance from the release present in soil, sediment, water or air in excess of a reportable concentration). These releases will only be required to be abated in accordance with prevailing standards and guidelines. These releases will be deemed to have reached an early exit upon achieving the appropriate abatement. For releases to the materials of buildings, such materials must be cleaned to applicable standards if standards exist or if no standard exists, cleaned of all recoverable product to the extent that the impacted building is safe for reoccupation.

New Release Cleanup Early Exit

If the responsible party is able to meet all of the following requirement for a particular release, they will have no further obligations to address this release unless audit by DEEP determines that the information submitted is not sufficient to determine that actions performed by the responsible party do not satisfy these requirements. DEEP will be permitted to audit New Release Closure Reports.

- 1) Cleanup has been completed within 30 days of the date of the release, unless otherwise authorized by DEEP;
- 2) Confirmation exists that soil remediation is in compliance with the RSRs with unrestricted use of the release area (i.e., compliance with the residential direct exposure criteria and the GA pollutant mobility criteria);
- 3) Confirmation exists that impacts to surface water and sediments have been cleaned to background levels;

- 4) The release did not impact groundwater based upon a determination by a professional qualified to determine the degree and extent of releases to environmental media, including but not limited to, a licensed environmental professional licensed pursuant to CGS section 22a-133v (“LEP”), an Emergency Cleanup Contractor permitted pursuant to CGS section 22a-454 or DEEP personnel;
- 5) Once the release has been remediated, the responsible party certifies, on a form prescribed by DEEP, that the release or potential release no longer creates any condition that would pose a risk to the environment or human health, except that if the responsible party fails to act and cleanup is performed by DEEP, no such certification may be made by the responsible party;
- 6) A New Release Closure Report is completed on the form prescribed by DEEP and submitted to DEEP within 45 days of the date of the release, unless otherwise authorized by DEEP.

Early Exits for Certain Historical Releases

DEEP will be evaluating opportunities for certain historical releases to be permitted to achieve some form of early exit. *DEEP is seeking input from stakeholders on this concept.*

d. Investigation Requirements

Responsible parties are responsible for investigating pollution resulting from releases. The extent of investigation required will ultimately depend on the level of information known about the release mechanism, characteristics and quantity of the released substance(s), impacted media, transport mechanisms, and location of potential sensitive receptors or environments. As an example, a small release of petroleum that is observed, contained, and abated using best practices will not require traditional site investigation, as the degree and extent of the release is known. Investigations shall be conducted in accordance with prevailing standards and guidelines. For sites subject to federal requirements for investigation of contamination, the responsible party will also need to ensure that all applicable requirements are met.

e. Transition To Long-Term Cleanups

If the responsible party is unable to meet an early exit, they must, after abating likely or actual high-risk exposures, comply with the investigation and remediation milestones outlined below.

V. Long-Term Cleanups

a. Investigation and Remediation Milestones

These milestone submittals shall be submitted for reported releases which are subject to the cleanup program, and were not closed pursuant to an early program exit (New Release Cleanup Exit or Contained Release Exit). Milestone submittals shall be accompanied by a LEP Verification (unless noted

or authorized by DEEP) and can be subject to DEEP audit. A single report may serve to satisfy more than one milestone.

- 1) Investigation Report
 - a. Degree and extent of pollution and analysis of likely or actual exposures
 - b. Due within 2 years of release report

- 2) Remedial Action Plan
 - a. Plan of proposed remedial action and schedule
 - b. No verification necessary to accompany plan
 - c. Document can be detailed or overview can be provided on a DEEP form
 - d. Due within 3 years of release report

- 3) Long-term Operation and Maintenance Plan and Surety
 - a. Includes as necessary: Groundwater Remediation Plan, Post-remediation Groundwater Monitoring Plan, institutional control monitoring plan, financial assurance, and reporting schedule
 - b. *Not required when achieving a Class A cleanup*

- 4) Annual Reports
 - a. Provides details of actions taken to investigate and remediate
 - b. Required until active remediation is complete – afterwards, Long-term Operation and Maintenance Plan will dictate reporting
 - c. Report will be on a form provided by DEEP

- 5) Supplemental Remediation Report
 - a. Outlines actions taken to remediate other materials, structures or areas, such as building materials, underground utility vaults or tanks, vehicles, utility poles, paved surfaces, or secondary containment
 - b. Can be combined with Soil and Groundwater Remediation Status Reports

- 6) Final LEP Verification
 - a. Provides all necessary documentation and opinion stating that the release has been remediated

b. Pollution Remediation

Responsible parties must achieve one of the following cleanup exits, unless the release was closed pursuant to an early program exit. Not all of the options are available under certain federal programs (e.g., TSCA, NESHAPS), although DEEP will be working with federal agencies to receive concurrence with these cleanup approaches where possible. Responsible parties are always required to comply with all federal, state, and local requirements.

Class A Cleanup

- Soil and groundwater remediation complete and in compliance with the RSRs
- There is no restriction on use of the release area and no need for a long-term operation and maintenance plan (i.e., no institutional control needed)
- No remaining pollution which could pose a risk to human health or the environment

Class B Cleanups

B1 Cleanup Exit

- Soil and groundwater remediation complete and in compliance with the default RSRs criteria
- An Environmental Land Use Restriction, deed notice or other institutional control is filed
- Long-term operation and maintenance plan completed and financial assurance posted

B2 Cleanup Exit

- Soil and groundwater remediation complete and in compliance with RSRs risk-based or site-specific approaches
- An Environmental Land Use Restriction, deed notice or other institutional control is filed
- Long-term operation and maintenance plan completed and financial assurance posted

Class C Cleanups

C1 Cleanup Exit

- Soil remediation complete and in compliance with the default RSRs criteria
- An Environmental Land Use Restriction, deed notice or other institutional control is filed
- Groundwater remedy operational or remediation in compliance with the default RSRs criteria
- Long-term operation and maintenance plan completed and financial assurance posted

C2 Cleanup Exit

- Soil remediation complete and in compliance with the default RSRs risk-based or site-specific approaches
- An Environmental Land Use Restriction, deed notice or other institutional control is filed
- Groundwater remedy operational or remediation in compliance with the default RSRs criteria or RSRs risk-based or site-specific approaches
- Long-term operation and maintenance plan completed and financial assurance posted

VI. Public Participation

As the response to releases will likely be timelier, especially for historical releases, as the result of these proposed program revisions, alternative public participation processes will need to be considered. It is imperative that the general public understands which releases are occur, are discovered and the status of their cleanup. It is also important that potentially impacted parties have an opportunity to comment on certain cleanup approaches that do not utilize permanent remedies in address such releases. Several

methods can be effectively employed by DEEP and responsible parties to ensure adequate public participation opportunities exist.

a. Public Notification of Releases and Cleanup Status

With the increased emphasis on timely reporting and release response, certain traditional methods of public participation will not be effective or beneficial to public health or the environment. Alternative methods of notification through posting important information on public webpages can be utilized. Technology upgrades are available to allow information about releases and status of cleanups to be posted regularly on a webpage hosted by DEEP. This process would satisfy interested parties' right-to-know, as well as provide responsible parties with an efficient means to disseminate information.

In certain cases where high risks still exist, additional methods, such as perimeter signage with appropriate contact information, should be employed.

b. Public Notices and Informational Sessions

When certain remedies are selected by a responsible party that will not fully address a release to the degree that will be safe for unrestricted current and future use of a property, additional public participation should be afforded. Similar to the current system of cleanup, if pollution does not reach a permanent solution (i.e., use of an engineered control or certain institutional controls), formal public notice should be provided. However, it is not always necessary to provide an opportunity for a formal public hearing. Recent use of new public participation tools in DEEP's Environmental Justice program have shown that informal public informational sessions most often cure the public's concern with a given approach or pollution problem. It is often the information that isn't known, that will result in significant concern by the public.

c. Public Communication

An issue that has been raised by many stakeholders, is that limited access to information has impeded their ability to become informed and to engage DEEP and responsible parties in meaningful discussions regarding certain pollution issues.

- 1) DEEP will create a dedicated webpage for community members to visit for listings of all public notices related to remediation.
- 2) Public notices will be required for all releases which are not being closed by a Class A Cleanup exit or by New Release Closure.
- 3) Create an alternative option for public participation to the administrative hearing.

VII. Remediation Standard Regulations

The RSRs, which are the State's cleanup standards, will need to be modified to address proposed changes to the cleanup program. In addition, as cleanup will shift to a release-based system, the RSRs will need to be further streamlined and updated to ensure timely and commonsense approaches can be applied to releases while maintaining the protection of human health and the environment, which is the basis for the regulations.

DEEP is currently moving forward regulatory changes that will start to achieve the goal of regulations that focus on the highest risk and reduce roadblocks to prompt cleanup. However, more must be done to achieve these goals while ensuring needed human health and environmental protections are in place. The following is a list of proposed additional changes to the RSRs that DEEP has been evaluating.

Stakeholder feedback and suggestions on these concepts is critical.

- 1) Definitions update – provide more clarity on certain concepts (e.g., anthropogenic contamination, background versus naturally occurring contaminants versus historical and widespread fill versus upgradient conditions)
- 2) Applicability section update – how RSRs apply to release areas, how RSRs do not apply to certain circumstances (e.g., naturally occurring issues, appropriately applied pesticides and herbicides, permitted discharges), transition clause for criteria updates, and QA/QC data validation
- 3) Evaluate compliance options/structure in general – provide more flexibility with different types of compliance options, increase self-implementation while providing same level of protection, and expand options for levels of cleanup (see tiers below)
- 4) More tiers for criteria – e.g., residential, recreational, commercial, industrial, agricultural, etc. – will allow for land use-based cleanup and provide more standard options for compliance without requiring DEEP approval
- 5) Update science behind criteria development –
 - a. Revisit PMC applicability concepts and evaluate assumptions in calculating the criteria to take into account age of release, type of substance released, geology, fate and transport, dilution factors, and leachate analysis
 - b. Re-evaluate applicability of groundwater criteria to incorporate site-specific conditions, exceptions, naturally occurring compounds and decrease long-term monitoring obligations
 - c. Investigate volatilization concepts, including researching vapor risk posed by soil impacted by volatile compounds, models for vapor transport, mechanism to mitigate risks, and addition of new criteria tiers

- 6) Establish sediment benchmarks – will clarify when action is to be taken to protect ecological receptors, while allowing for site-specific approaches
- 7) Evaluation of institutional controls – evaluate current risk assumptions (e.g., depth and cover material requirements) and offer expanded range of controls (e.g., self-implementing deed notices)
- 8) Increased self-implementation options – evaluate providing additional authority to LEPs, while ensuring for appropriate responsibility and accountability
- 9) Adjust groundwater monitoring – eliminate the need for groundwater monitoring requirements for certain new releases or releases that did not pose a risk to groundwater quality and significantly condense compliance and post-remediation groundwater monitoring periods

VIII. LEP Authority, Education, DEEP Auditing and the LEP Board

The reliance on LEPs will increase under the transformed cleanup program. With an expanded role for LEPs, comes a greater need to ensure that LEPs are providing the best services for the citizens of the State of Connecticut and that they are holding paramount human health and the environment. This can be accomplished through ensuring LEPs have critical education and training, enhancing DEEP's auditing program, including increasing field verification and confirmation sampling by DEEP, and increasing the role of the LEP Board.

Since the role of LEPs will increase, DEEP must ensure that there is a comprehensive education and training program for LEPs. For example, it will be critical that LEPs have the appropriate training for the timely remediation of new releases. DEEP will work with the Environmental Professionals' Organization of Connecticut (EPOC), the membership organization for LEPs, to determine what additional training should be required. In addition, further continuing education that ensures regular education on key competencies should be discussed.

DEEP currently has an audit program that continues to, with appropriate communication with the LEP community, improve the environmental outcomes directed by LEPs. As the cleanup program evolves, so to must DEEP's auditing of LEPs. Timely and transparent auditing and enforcement, as needed, can be used to guide LEPs and ensure that the environment and public health are protected. An effective LEP community will also ensure that businesses be confident when relying upon LEPs.

Another tool that can be enhanced to maintain quality LEP performance is the State Board of Examiners of Environmental Professionals (known as the "LEP Board"). The LEP Board currently has no permanent staff to aid in the investigation and administration of potential misconduct by LEPs. A release based and more self-implementing cleanup system will significantly increase the role of LEPs and the volume of LEP decisions and submittals. The new cleanup program should include permanent staff for the LEP. Such enhancements have been suggested by many stakeholders.

IX. Enforcement Authority

While all current enforcement authorities regarding the creation or maintenance of sources of pollution will remain as specified in CGS Chapters 445 and 446k, DEEP will be evaluating additional compliance assistance methods as any new program is implemented. Further, DEEP will be working with the regulated community and the Office of the Attorney General on creating a presumption against enforcement in certain cases where a responsible party, who complies with all reporting and response requirements, did not intentionally or through negligence action or inaction cause a release.

In addition, new enforcement authorities, including penalties, will be added for failure to report releases, failure to conduct the mitigation, investigation, and remediation required, failure to submit the required reports in a timely manner.

X. Private Contribution Actions

DEEP will work with the regulated community and the public to ensure that responsible parties have all appropriate opportunities to seek contribution from past owners and operators that may have caused, contributed to, or maintained any release for which they report and take action to address. A clear standard will create a more equitable sharing of costs among those that share responsibility.

XI. New Voluntary Remediation Program

Some property owners may not be aware that any release has taken place on their property. However, for a variety of reasons, they may wish to confirm whether pollution exists (e.g., in preparation of development or in anticipation of marketing a sale).

Any owner of property would be permitted to enter their property into a Voluntary Remediation Program ("VRP"). While in the VRP, the owner shall undertake an investigation of their property and as releases are identified, the property owner shall notify DEEP (on a form prescribed by DEEP). Like the traditional release response outlined above, all owners enrolled in the VRP must comply with **Immediately Required Response Actions** and abate any discovered **High-Risk Hazards**.

XII. Transition From Existing Programs

As there is a transition to a new cleanup program, many of the existing programs will sunset. Most importantly, the Property Transfer Act will no longer apply to the transfer of any establishment after the effective date of the new program. Parties currently in the Property Transfer Program will retain their obligations. However, these certifying parties will be able to utilize any enhancements to the RSRs, including the multiple cleanup exits.

The other programs that will sunset as a new program becomes effective include Significant Environmental Hazard Notification, and the two and existing Voluntary Remediation Programs. Spill notifications made to DEEP prior to the effective date of the new program will not be required to comply

with the new program requirements, provided that the responsible party has completed appropriate release response or unless the owner of the property submits a new release notification to DEEP.

XIII. Liability Relief, Insurance and Special Consideration

DEEP will be seeking additional input from stakeholders on transitioning liability relief programs, such as the Covenant Not To Sue, Abandoned Brownfields Cleanup, and Brownfield Remediation and Revitalization programs.

In addition, DEEP will be seeking additional input from stakeholders on special consideration, including opportunities for new insurance products, for municipalities, home owners, farmers, small businesses, and owners of properties with legacy pollution.