

Dear Members of the Release-Based Working Group,

On behalf of DEEP and DECD, we are providing updates on several initiatives related to the implementation of the release-based cleanup framework in advance of our **next Working Group meeting on December 9, 2025 at 1 PM**. *(Please look for the typical Zoom Webinar credentials for the Working Group in your email. Reminders will be sent out one week and one hour in advance of the meeting.)*

As you know, the Release-Based Cleanup Regulations (RBCR) will go into effect on March 1, 2026. We have been working diligently to ensure as smooth a transition as possible. These initiatives will be focused on streamlining, clarifying and training stakeholders on the implementation of the RBCRs.

DEEP has been working on new General Permits and modifications of existing Permits for oversight of cleanup activities:

General Permit to Employ a PEP to Oversee Cleanup Activities

- This general permit will allow responsible parties to employ PEPs for oversight of certain cleanup activities.
- The permit will include the same qualifications required of PEPs under individual permits. You will recall that DEEP previously sought comment on the training and experience requirements for PEPs from the Working Group. Thank you to all who provided comment.
- A draft General Permit is currently under internal review, with public notice and comment anticipated before the end of the calendar year.

Modifications to Individual 22a-454 Permits to Include PEPs

- The process to modify existing individual permits will begin in early 2026, once the mandatory PEP training is available.
- Outreach to **Permitted Spill Cleanup Contractors** will begin before the end of this year.
- The modification process will be simple and straightforward, ensuring PEPs are ready to operate by **March 1, 2026**.

New Registered Existing Release Response Contractor General Permit

- While not directly tied to the release-based cleanup transition, we recognize that folks have interest in the general permit we have been discussing to address lower risk, historical or existing releases in compliance with section 22a-454 of the

general statutes. DEEP recently finalized the Registered **Existing Release Response Contractor General Permit** and information on the distinction between a Permitted Spill Cleanup Contractor and what will be a Registered Existing Release Response Contractor can be found here: <https://portal.ct.gov/deep/permits-and-licenses/permits-to-act-as-a-contractor-to-contain-or-remove-or-otherwise-mitigate-the-effects-of-a-release#ind> ?

- As you know, public notice was provided for this General Permit last year, and DEEP appreciates all of those that provided public comment.
 - The intent of this GP is to provide statutory coverage for contractors who “contain, remove, or otherwise mitigate the effects of a discharge, spillage, uncontrolled loss, seepage or filtration of waste oil or petroleum or chemical liquids or hazardous wastes.”
 - The General Permit is designed to make it easier for contractors conducting standard brownfield-type cleanups to obtain appropriate authorization.
 - It will **not** apply to releases subject to the Release Reporting (Spill Reporting) Regulations, the UST Regulations, or to releases involving PCBs above 10 ppm or otherwise regulated under TSCA.
- DEEP’s primary goal is to ensure contractors performing cleanups are accountable and that activities do not exacerbate pollution releases. We’re happy to provide additional information on these permits.

DEEP is also working to develop and implement trainings to support effective implementation of the RBCRs:

Permitted Environmental Professionals (PEPs) Training Program

- A training program for Permitted Environmental Professionals is in development.
- Vendors have been identified, and DEEP is reviewing training materials.
- Additional details and outreach will be shared soon.

Release-Based Cleanup Regulations Training Plan

DEEP is excited to announce that we are advancing our plans for training on the release-based program itself.

- DEEP is preparing Department-led training sessions on both the Release-Based Cleanup Regulations and how these regulations and requirements relate to other cleanup programs. These sessions will include topical workshops with opportunities for questions and discussion. More information on these Department-led trainings will be shared with the Working Group and posted on DEEP's website later this month. Please save the following dates for upcoming training.
- December 11: ***Implementation Overview & Training Schedule [Cliff notes training]***
- January 21: ***Introduction to RBC Regulations and programs [101-type training]***
- January 28 and continuing into the Spring on most Wednesdays [and some other days]: ***Focused Sessions for Key Topics/Modules- RBC Regulations and Programs***
- In the coming months, we will be seeking comments on additional training that may be helpful to the regulated community prior to and after March 1st.

REACT Update and Training Plan

DEEP is happy to report that progress is being made on the Release, Environmental Assessment, and Cleanup Tracker (REACT) system. The State's contractor has built this system, and DEEP staff are working with the contractor to ensure delivery of a viable product. Thankfully, we expect a go live date in advance of the March 1st Release-Based Cleanup Regulations date. We are also advancing our plans for training on the REACT system.

- DEEP is working on Beta testing of the early version of REACT with select external stakeholders.
- We are also preparing a training and support plan for the new REACT system that will start after the system is available to users.
- Training will include introductory-level overviews. We will also be offering more in-depth Office Hours and Help Sessions to aid folks in getting up-to-speed on the workings of the new system.
- As you may recall, DEEP has retained contracted resources to assist us with rectifying and migrating existing data into the REACT system.

- Finally, DEEP is also developing a plan for aftercare that will provide helpdesk-type support for users after REACT is launched.

We appreciate your continued engagement and partnership as we move forward with these important implementation efforts. We look forward to discussing these topics at the December 9th Working Group meeting. Enjoy your Thanksgivings!

Best,

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