

Hi Graham,

Unfortunately I won't be able to attend next Tuesday's WG call as it conflicts with my annual off-grid Maine fishing vacation. Nevertheless, I did want to take this opportunity to offer food for thought regarding the Department's tiering approach rolled out during last month's meeting/call.

Given that the tiering forms presented are to be filled out/signed off by LEPs, who are presumed to have a strong technical and RBP programmatic background, I would suggest that new releases be defaulted to Tier II (i.e., LEP lead) rather than Tier 1 (1A or 1B) in the same presumptive manner that new CTA filings currently are defaulted to LEP lead within 90 days unless DEEP makes an alternative determination. The obvious exception would be those releases where Tier IA triggers have been identified by the LEP at the time of the filing. The Tier 1B assessment could be required to be completed by the LEP within that 90 day period with the outcome being formally submitted within 60 or 75 days of filing to allow to the Department to counter the presumptive LEP delegation.

I'm afraid that without this or some similar modification to the proposed tiering process/work flow that the Department will end up being unnecessarily overburdened as the lead for far more sites than it is currently, noting that the vast majority of these new releases appropriately could be LEP led as is the case under the existing CTA program.

Good luck next Tuesday - Tim

Tim Whiting

Licensed Environmental Professional
Senior Managing Consultant
1692732 - New England

D +1 860-503-1668
M 8607487036
twhiting@ramboll.com

Ramboll
100 Pearl Street
East Tower, Third Floor
Hartford, CT 06103
USA
<https://ramboll.com>