

Good afternoon,

As discussed below, additional working group meetings are needed to meet our goal of delivering draft regulations to the Working Group by the end of the year. Previously scheduled meetings will be held on September 12, October 10, November 14, and December 12.

The additional meetings mentioned below have been scheduled for 1:00-2:30 PM on the following dates (adjusted in certain cases to avoid conflicts and to take into consideration holidays):

September 26

October 31

November 28

December 21

Your participation in these meetings is deeply appreciated. Additional information on meeting credentials will follow through Zoom.

Best,
Graham

Subject: Working Group Updates

Dear Working Group Members,

I write to announce a change in the standing agenda for upcoming working group meetings. We have finished the brainstorming phase of the process; no future subcommittees or ad hoc teams are anticipated. As we have previously discussed, the pace will increase as the Department works to meet its goal of providing draft regulations by the end of this calendar year. There are more topics on which the Department will share its thinking with the working group than there are months left in the calendar year. Our agenda and work plan must reflect this new phase.

We hope that these changes will address two important goals. First, we want to seek advice and feedback on topics important to you and the agencies. Second, we want to make sure that we're giving the working group thorough and well thought out responses to your feedback and questions. I have seen this group work through really challenging topics when we have productive exchanges.

Please note the following adjustments:

- Beginning in September, the Department will offer two or more presentations each month. **In September, presentations will include: 1) an overview of required immediate actions for significant existing releases (“SERs”), and 2) the process for determining “background” at the time of discovery.** The Department is hard at work finalizing concepts and, in some instances, draft regulatory language to present at the October, November, and December meetings. Topics are anticipated to include, but may not be limited to:
 - immediate action endpoints, documentation, and tiering of remaining impacts
 - a “special path” for historical fill
 - one or more “exposure scenarios” in addition to residential and industrial/commercial
 - adjustments to the cleanup standards for residential heating fuel releases
 - a discussion of closure documentation and audits
 - an optional, site-wide cleanup approach
 - fees
- The Department will provide each presentation, and any relevant draft regulatory language, as far in advance of the meeting as is possible. Materials will be provided no later than the Friday before the meeting, and a week in advance whenever possible.
- To ensure the Department can provide thorough and well thought out responses to working group feedback and questions, we ask that questions be submitted in writing, up to seven (7) days following the presentation.
- Beginning in September, on the 4th Tuesday of each month (or on another date when holidays complicate scheduling), the Department will host a second monthly meeting to answer written questions received. Note that the Department will not respond to comments at this meeting. Instead, the Department will review the written questions received in advance of the meeting; identify and group relevant comments; and provide answers, clarifications and additional information. We hope that this process will allow working group members to listen to

presentations and spend time thinking about the topic in the context of the overall program framework before submitting written questions.

- The Department will still solicit feedback on the topics presented. After the question and answer session, the Department will accept written feedback on presentation topics on an ongoing basis.

This new approach will help us work together efficiently to disseminate information, answer questions, and receive the working group's important feedback. If we find that this system needs to be modified, we are happy to have that conversation.

The Department is also working on an updated version of the "first-year roadmap." Roadmap "version 2.0" will include: updates on terminology to be used in the release-based regulations; links to relevant presentations or draft language; and information on the schedule for presentations for remaining topics. The Department will continue to update this roadmap, which, together with the "tiers checklist," serves as the skeleton around which the proposed regulations will be built.

I am also providing – in redline, and in clean text – an updated "tiers checklist." As discussed, these edits were made as a result of discussions with the Tiers Checklist Ad Hoc Team. I would like to thank the members of the ad hoc team for their time and their interest on this important piece of the future regulations. The tiers checklist has benefited from these focused conversations.

We hope that as we enter the next phase of the working group, that the meetings and exchange of ideas will increase in value. Everyone has put in so much effort to date, whether through meeting participation, commenting on documents, being on subcommittee or one of the various team. We greatly appreciate your advice and feedback as we look to reshape Connecticut's future through a transformation of its cleanup program.

With gratitude,
Graham

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Chief

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