



Release Based Focus Session *Road Salt & PFAS Exemptions*

April 8, 2026

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Training Disclaimer

The following presentation was delivered by the Remediation Division of the Connecticut Department of Energy and Environmental Protection on April 8, 2026. This presentation is intended to be an overview of the Release Based Cleanup Regulations (RBCRs) Sections 22a-134tt-1 through 22a-134tt-13 inclusive, and 22a-134tt-App1 through 22a-134tt-App12, which became effective on March 1, 2026. This presentation is designed to answer general questions and provide basic information. You should refer to the appropriate statute or regulation for specific language. It is your responsibility to comply with all applicable laws and regulations. The information contained in this presentation is intended only to acquaint you with the RBCRs and does not constitute the Department's interpretation of the applicable laws and regulations.

For the purpose of this specific training regarding PFAS and salt, whenever “discovery of a release” is referenced, it is made with respect to the specific discovery of a PFAS/salt release. Additionally, any reference to “salt” means "chloride-based inorganic salt" as defined in the regulations.

Outline

Review of Definitions

Road Salt & PFAS Emergent Releases

Road Salt & PFAS Existing Releases

Other PFAS Exemptions

Other Road Salt Exemptions

Off-ramps

Case Studies

Q&A

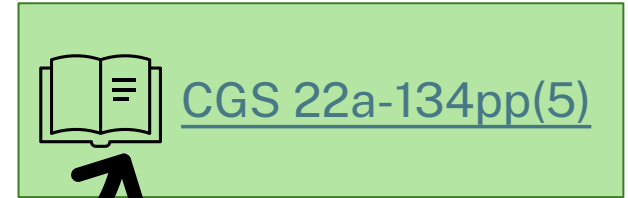




Review of Definitions

Review: Definition of “Person”

- A **person** is not just an individual. A **person** also includes:
 - Partnerships, associations, firms, limited liability companies, corporations, or other entities
 - The federal government, the state or any instrumentality or subdivision of the state, including any municipality
 - Any responsible corporate officer
- Two types of persons subject to the requirements of the RBCRs:
 - **Creator** – Person who created a release
 - **Maintainer** – Person who, regardless of fault for the creation of a release, owns a parcel of land on or under which such release, or a portion of such release, is located (or in limited circumstances, has possession of the land)
- A person creates or maintains a release, and upon discovery, reports (if required), and remediates release to cleanup standards.



RCSA Sec. 22a-134tt-1(h)

Definition of Road Salt

(20) “Chloride-based, inorganic salt” means an **inorganic** substance **containing chloride**, including sodium chloride, calcium chloride, magnesium chloride, or any other inorganic substance containing chloride

RCSA 22a-134tt-1(a)

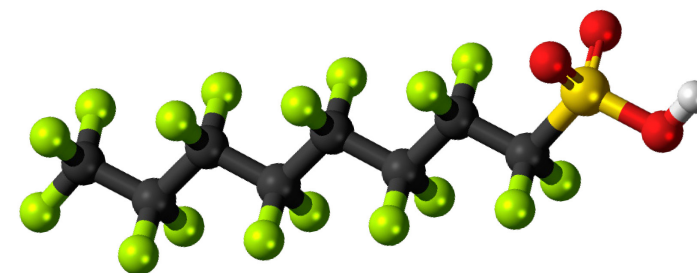
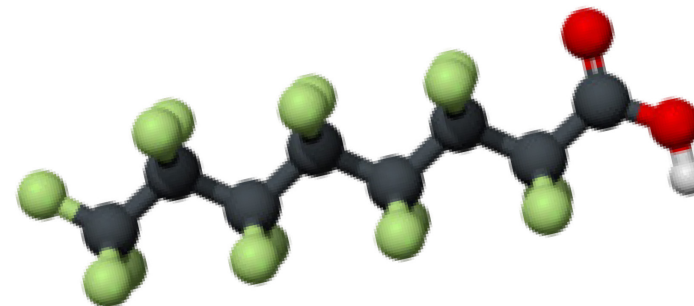


Photo Credit: Drew Kukucka, DEEP

Definition of PFAS

(107) “Per- and polyfluorinated alkyl substances” or “**PFAS**” means **man-made chemicals with at least one fully fluorinated carbon atom**, including but not limited to perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS).

RCSA 22a-134tt-1(a)



Updates to PFAS criteria are not the subject of today’s training.



Road Salt & PFAS Emergent Releases

Reportable Releases per the Release Reporting Regulations

Road Salt

- **>10 pounds OR >1.5 gallons** of deicing material in any **24-hour period**, released in a manner that does not follow general best management practices.
 - **Example: Salt truck equipment failure releases deicing materials in discrete location**

[RCSA Sec. 22a-450-2(b)(2)(A)]

PFAS

- The release contains **any quantity of** per- or polyfluoroalkyl substances, commonly referred to as PFAS, in **liquid** form, and includes, but is not limited to, chemicals commonly referred to as PFOS, PFOA, PFNA, PFHpA, and PFHxS.
 - **Example: Releases of AFFF from firefighting**

[RCSA Sec. 22a-450-2(b)(1)(K)]

Knowledge Check - PFAS

An industrial facility has a building fire suppression system that still contains AFFF. The facility's health & safety officer knows that deployment of AFFF is now illegal in CT, but the facility hasn't prioritized replacement of the foam. One morning, an old valve breaks, and AFFF leaks out of the building and into the grass.

Do they need to report the release?

A. Yes, the release should be reported to DEEP Dispatch.

B. No, they are going to clean up the release within 2 hours so there's no need to report.

Knowledge Check Answer - PFAS

An industrial facility has a building fire suppression system that still contains AFFF. The facility's health & safety officer knows that deployment of AFFF is now illegal in CT, but the facility hasn't prioritized replacement of the foam. One morning, an old valve breaks, and AFFF leaks out of the building and into the grass.

Do they need to report the release?

A. Yes, the release should be reported to DEEP Dispatch.

B. No, they are going to clean the release within 2 hours so there's no need to report.

➤ **Per the RRR, the release of any amount of PFAS liquid is a reportable release and because it hit the land of the state will be subject to the RBCRs as an Emergent Reportable Release. The Release-Based case will appear in REACT for case management, including uploading submittals.**



Road Salt & PFAS Existing Releases

Residential Discovery Exemption

RCSA Sec. 22a-134tt-1(i)(1)



Discovery of Existing Releases on Residential Parcels

An existing release shall **not be determined to be discovered** if:

- The release area is located on **parcel** used **only for residential activity**
- The **person** who obtains knowledge of release is the **owner of such parcel**
- The release **not known to impact any other parcel** under different ownership
- The person who obtains knowledge of release is **occupant** of **single-family home, AND**
- The release is **NOT** a Significant Existing Release (SER)

“Residential activity” as defined in RCSA Sec. 22a-134tt-1(133).



This discovery exemption does **NOT** apply to multi-family residential properties or rental properties.

Discovering & Reporting PFAS/Salt in Drinking Water

If an existing release of PFAS/salt is discovered in a public/private drinking water supply or well by the water supply owner/operator...

- **Not an SER** (IAs are not required)
- **If they report within 3 days**, owner/operator of the water supply/well is **not required** to take **further action** or **pay fees** required by RBCRs, **unless** DEEP determines they created/maintained the source of PFAS/salt.



RSCA Sec. 22a-134tt-1(i)(2)

Discovering & Reporting PFAS/Salt in Drinking Water – cont.

NOTE! A single-family, owner-occupied parcel is exempt from “discovering” a release of PFAS/salt in their well (in most circumstances*).

- If a person who owns and occupies a single-family home tests their well water for PFAS/salt, they don’t have to report detections/exceedances to DEEP because, under most circumstances, they are exempt from discovery.
- They may report to DEEP, and DEEP may open an investigation under CGS 22a-471 or CGS 22a-134ss.

An owner/operator of a non-single-family parcel is NOT exempt from “discovering” PFAS/salt in a well and **must report** within 3 days if they don’t want to pay fees and take additional actions under RBCRs.

- For a non-single-family parcel, DEEP may investigate the source of PFAS/salt in the water supply well and may identify the property owner as the C/M, triggering discovery under the RBCRs.

RSCA Secs. 22a-134tt-1(i)(1) & (2)

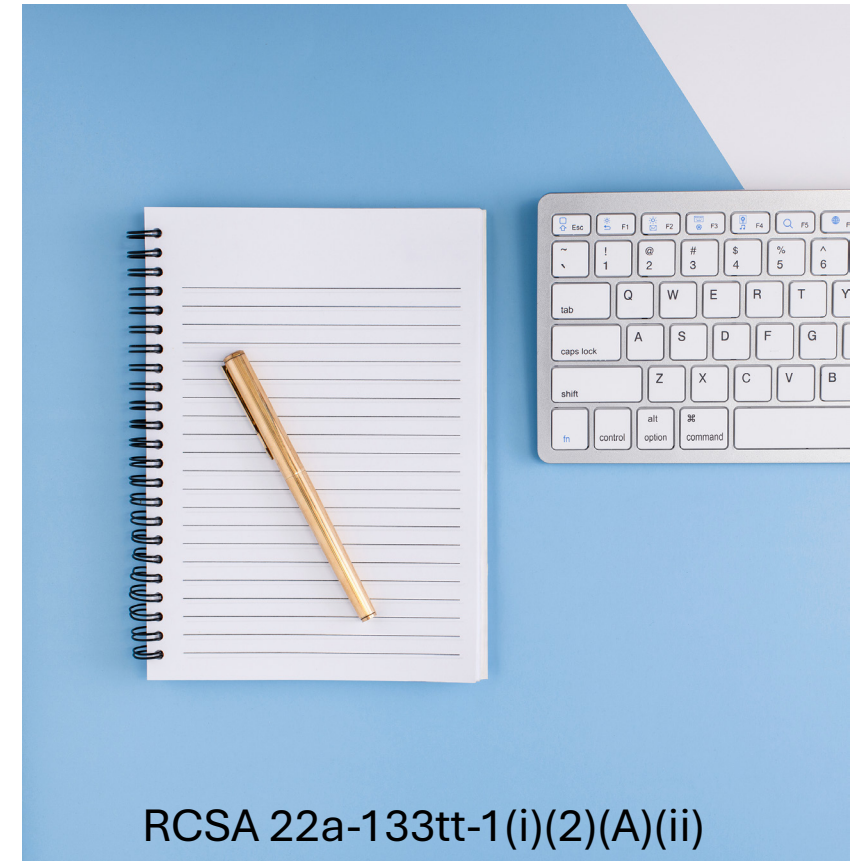
Summary of PFAS/Road Salt releases to Drinking Water Supplies and Wells Discovered by Owner/Operator

Scenario	Reporting Required?	Discoverable? Subject to RBCRs?
Private Well – Single Family Residence, Owner-Occupied	No , in most circumstances. Owner <u>may</u> report to DEEP.	No . No actions required per RBCRs. DEEP may investigate source, triggering discovery or CGS 22a-471 obligations.
Private Well – Single Family Residence, Rental	Yes . If reported within 3 days of discovery by owner/operator, no fees or action required by RBCRs.	Yes: <ul style="list-style-type: none"> - If not reported within 3 days of discovery, then IAs/tiering/fees. OR <ul style="list-style-type: none"> - If DEEP determines owner/operator of water supply created/maintained source of PFAS/road salt, then subject to RBCRs. DEEP may also issue an order to C/M to remediate source of PFAS/road salt and provide potable water.
Private Well – serves multifamily building(s) or multiple dwellings		
Private Well – Commercial/Industrial use		
Public Water Supply Well/Source		

NOTE: Public water supply systems are subject to regulation by DPH, including testing and reporting requirements. Notification to DEEP pursuant to the RBCRs does not supersede DPH’s regulatory authority.

How to Report PFAS & Road Salt in Drinking Water?

- All entities, other than owners of single-family, owner-occupied homes, should report within 3 days of discovery to avoid RBCR fees and tiering.
 - Report to DEEP.PotableWater@ct.gov
 - DEEP will collaborate to create and customize the case in REACT
- Owners of single-family, owner-occupied homes who want to share PFAS/road salt drinking water well results should contact the DEEP Remediation Division directly.
 - PFAS → DEEP.PFAS@ct.gov, copy DEEP.PotableWater@ct.gov
 - Salt → DEEP.PotableWater@ct.gov



Enforcement Pathways for PFAS and Road Salt in Drinking Water Supplies

DEEP notifies Creator/Maintainer

RCSA Sec. 22-134tt-1(i)(2)(B)

- If commissioner identifies both the source of a release of PFAS/salt & the Creator/Maintainer of such release, commissioner shall notify Creator/Maintainer
- Source shall be considered discovered & subject to RBCRs

DEEP may issue Order to C/M

RCSA Sec. 22-134tt-1(i)(2)(C)

- Commissioner may issue an order pursuant to **CGS 22a-134ss** or **CGS 22a-471** to each Creator/Maintainer
- Requires remediation of release & provision of drinking water to all affected persons



The RBCRs do not preclude DEEP from using other enforcement mechanisms, including but not limited to, CGS 22a-432.

Orders – CGS 22a-134ss

- The commissioner may **order** any **person** who has **created/maintained a release** to the land & waters of the state **on/after March 1, 2026**, to take necessary steps **to comply** with provisions of CGS 22a-134qq to -134tt, inclusive.
 - **DEEP may issue an order compelling the Creator/Maintainer of PFAS- or road salt-polluted water supply to address the existing release following RBCR requirements, including:**
 - Immediate Actions to provide potable water
 - Tiering
 - Remedial Actions

Enforcement – CGS 22a-471

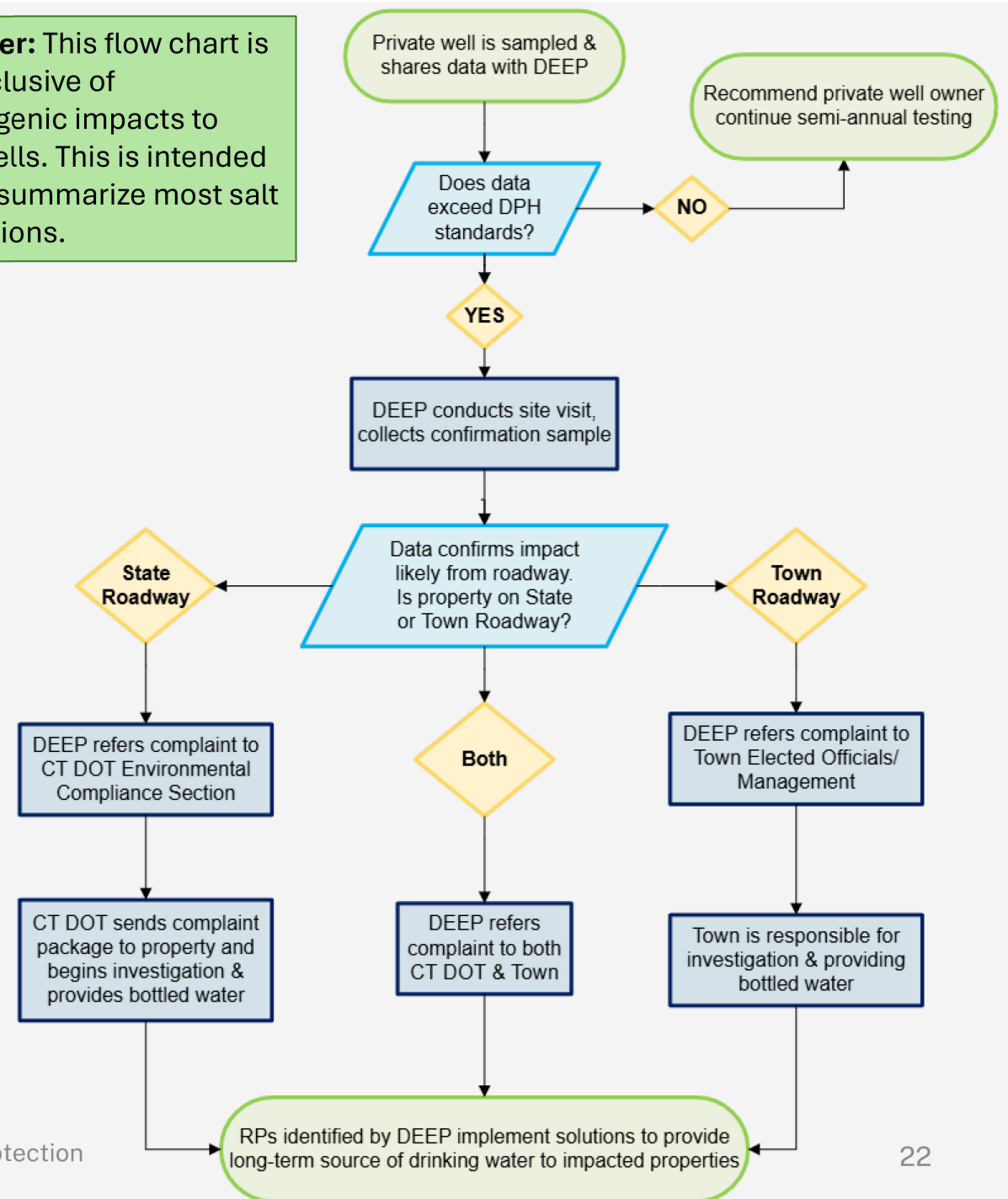
- Colloquially referred to as the “Potable Water Statute”
- Charges DEEP with **protecting** groundwaters of the State used for **drinking water/domestic purposes** from anthropogenic contamination
- C/M identified by DEEP **must provide** short-term (temporary) & long-term (permanent) source of **drinking water** to impacted parties
- If C/M or source is unclear, responsibility **defaults** to **municipality**
- DEEP has authority to **issue orders** to C/M to investigate & implement remedies



Salt Investigation Framework

- Requires collaboration between DEEP & C/M
- C/M identified by DEEP must provide bottled water to impacted property owner
- Ideal to resolve impact to homeowner as quickly as practicable
- C/M investigation expected to focus on long-term resolution for impacted property owner

Disclaimer: This flow chart is not all inclusive of anthropogenic impacts to private wells. This is intended to briefly summarize most salt investigations.





Other PFAS Exemptions

Discovery of PFAS to Land and Waters of the State

- Discovery of an existing release of PFAS will only be considered a release subject to the RBCRs when:
 - The concentrations detected indicate the release is present due to **more than** just **atmospheric deposition** or the **use of consumer products for their intended purpose**, AND
 - The **source** of the release is or was **located on the parcel where such release is discovered** or **another parcel that is or was owned or operated by the creator** of such release.



NOTE: This does not apply to the discovery of PFAS in a public or private drinking water supply.

22a-134tt-1(i)(3)(A)

Discovery of PFAS in Land and Waters of the State (cont.)

“Industrial/commercial activity” as defined in RCSA Sec. 22a-134tt-1(a)(74).

For parcels with past or current Industrial/Commercial activities discovering PFAS:

- If PFAS are discovered on an industrial/commercial parcel known or suspected to use PFAS in its operations, it shall reasonably be expected that the source of such release is or was on the parcel in question.
- The C/M's obligation is to identify the source of the PFAS whether it be from current or past operations, an off-site source including but not limited to atmospheric deposition, or use of consumer products.
- To use the air deposition/consumer products exemption, the release needs to be **reported within 1 year of discovery**



22a-134tt-1(i)(3)(B) & 22a-134tt-1(i)(3)(C)

Determining Whether PFAS is from Atmospheric Deposition or from an Actual Release

- First, evaluation of past and current activities at the parcel is needed, including the opportunity for air emissions from stack/exhaust vents to result in a release.
- Site-specific background sampling may be necessary.
- Results from ongoing DECD-USGS PFAS anthropogenic soil background study *may* inform guidelines in the future.



PFAS Incidental Releases – Ineligible for Lower Bounds Exemption

Lower bounds were added to the RBCRs to provide a regulatory off-ramp for the discovery of very low levels of compounds, with two different paths available for concentrations at 25% and 50% of criteria.

- However, **PFAS compounds (and VOCs) are not eligible** to make use of these lower bounds exemptions for incidental releases.



22a-134tt-1(i)(4)(B) & 22a-134tt-1(i)(4)(C)



Other Road Salt Exemptions

Incidental Roadway Releases

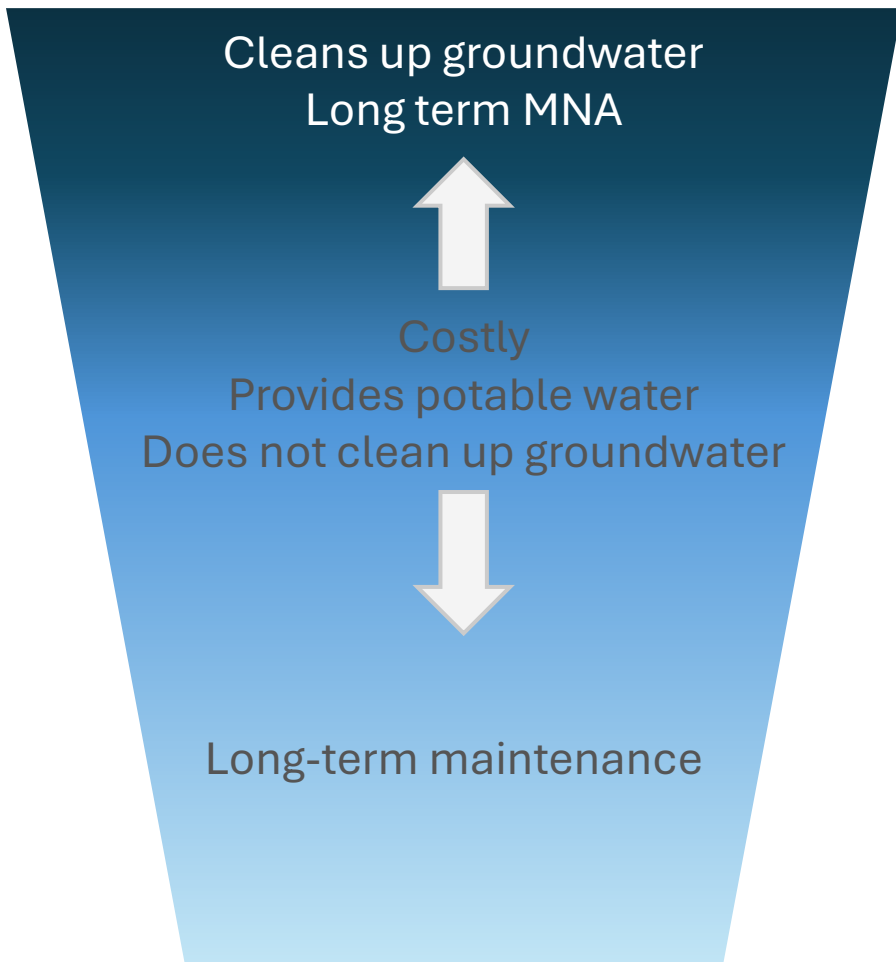
- **No person** responsible for **maintenance of public roadway** shall be determined to be maintaining an incidental public roadway release on, under, or in the right of way for which such person is responsible **provided**:
 - Roadway release is a release of **chloride-based, inorganic salt** and such release has impacted a private/public drinking water supply, a **safe drinking water supply is provided by the creator/maintainer**





Off-Ramps

Road Salt Off-Ramps



- Reduce all sources of salt introduced to nearby environment
 - **Primary goal to reducing salt impacts, but takes the longest to see benefits**
- Connection to public water
 - **Not always practicable/available depending on property location**
- Construction amendments to existing wells
 - **Deepening the existing well**
 - **Installing packer(s) to seal off salt-laden fractures**
- New well construction
 - **As far away from road as possible**
 - **Deeper casing (at least 60' of casing in bedrock)**
 - **Deeper well**
 - **Well casing grouted with salt resistant material**
- Whole-house Reverse Osmosis (RO) filtration
 - **Will remove *all* minerals in water**
 - **Requires storage tank for on-demand use**
 - **Creates high volume of water treatment wastewater**
 - **Requires separate dedicated dispersal system outside home**
 - **Maintenance costs**
 - **Requires additional treatment systems to re-mineralize water**



PFAS in Drinking Water Off-Ramps

- Many of the same off-ramps as for Road Salt
- DEEP is providing bottled water/granular activated carbon (GAC) filtration in specific DEEP-led investigation areas.
- If a Creator/Maintainer for PFAS pollution is identified, DEEP will require the C/M to provide a source of potable water to affected persons.
 - **DEEP may use enforcement mechanisms available (CGS 22a-134ss, 22a-432, 22a-471, others)**

Case Study 1: Road Salt

A homeowner (single-family home) tests their water after they've replaced their 3rd water heater in the past 4 years. They used a state-certified lab to test their water for basic indicators including sodium and chloride. The lab results indicate the chloride levels exceed the DPH MCL of 250 mg/L and the sodium levels exceed the DPH guidance level of 100 mg/L. The resident files a complaint after they find the DEEP Road Salt Investigation webpage a few weeks after receiving their results.

Is this property subject to the RBCRs?

- A. No, because single-family homeowners are exempt from discovering a release unless it is an SER & road salt detections are not considered SERs.
- B. Yes, because the homeowner took a week to file a complaint with DEEP.
- C. No, because the drinking water wasn't collected by an environmental professional.

Answer 1: Road Salt

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Case Study 2: Road Salt

A resident in a 6-unit apartment complex notices their drinking water tastes different. The landlord has the water tested and the lab results indicate the chloride levels exceed the DPH MCL of 250 mg/L and the sodium levels exceed the DPH guidance level of 100 mg/L. The local health department recommends the landlord report to DEEP.

Does property manager have to report?

- A. No, because road salt is exempt from the RBCRs for all residential parcels.
- B. Yes, because the road salt discovery exemption is only applicable to single-family residential parcels.
- C. No, because the release was reported to DEEP.

Answer 2: Road Salt

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Does the property manager have to report?

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- C. No, because the release was reported to DEEP.

Case Study 3: Road Salt

A single-family residential homeowner has decided to start a private snow removal company to make some extra income. They decide to save money on a storage unit by keeping a pile of salt, without cover, in their private driveway. Their house is located on a 1-acre lot on a cul-de-sac with neighbors on either side. Their next-door neighbor reports to DEEP that they discovered elevated salt concentrations in their private well through a lab test. DEEP conducts a site visit and finds the uncovered salt pile in the neighbor's driveway.

Is the uncovered salt pile a "release" subject to the RBCRs?

- A. No, because road salt is exempt from the RBCRs for all residential parcels.
- B. No, because the release was reported to DEEP.
- C. Yes, because the pile of salt is a point-source of contamination that has impacted other properties & DEEP has discovered.

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- C. Yes, because the pile of salt is a point-source of contamination that has impacted other properties & DEEP has discovered.**

Case Study 4: PFAS

After watching the movie *Dark Waters*, the owner of a single-family residence tests the private well serving the home where she lives for PFAS. The results indicate a slight exceedance of the drinking water action level for PFOS of 12 ng/L (DWAL = 10 ng/L) and low-level detections of PFHxS and PFNA below DWALs.

Is this release subject to the RBCRs?

- A. Yes, because the PFOS concentration exceeds the DWAL.
- B. No, because owners of single-family, owner-occupied residences are exempt from discovering a release unless it is an SER, and PFAS detections are not considered an SER.

Answer 4: PFAS

After watching the movie Dark Waters, the owner of a single-family residence tests the private well serving the home where she lives for PFAS. The results indicate a slight exceedance of the drinking water action level for PFOS of 12 ng/L (DWAL = 10 ng/L) and low-level detections of PFHxS and PFNA below DWALs.

Is this release subject to the RBCRs?

- A. Yes, because the PFOS concentration exceeds the DWAL.
- B. No, because owners of single-family, owner-occupied residences are exempt from discovering a release unless it is an SER, and PFAS detections are not considered an SER.**

Bonus points - The homeowner may report her results to DEEP, and DEEP may initiate an investigation to identify the source of the PFAS in her private well.

Case Study 5: PFAS

Owners of an industrial facility are finally completing a Phase 2 site investigation. No PFAS-related operations have been conducted on-site for the past 10 years, but in the past, manufacturing included application of non-stick coatings to consumer products.

Results from a March 2026 sampling event show PFOA detected in on-site soils and groundwater monitoring wells at maximum concentrations of 40 ppb and 1,200 ng/L, respectively. The owners think they do not need to complete further investigation or clean up the PFOA because they can use the PFAS atmospheric deposition and consumer products exemption in the RBCRs.

Are the owners correct?

- A. Yes, because research shows that PFAS can be transported through the air, and the PFAS use was related to consumer products.
- B. No, because the PFAS source likely originated from past on-site operations, and the exemptions do not apply.

Answer 5: PFAS

Owners of an industrial facility are finally completing a Phase 2 site investigation. No PFAS-related operations have been conducted on-site for the past 10 years, but in the past, manufacturing included application of non-stick coatings to consumer products.

Results from a March 2026 sampling event show PFOA detected in on-site soils and groundwater monitoring wells at a maximum concentrations of 90 ppb and 1,200 ng/L, respectively. The owners think they do not need to complete further investigation or clean up the PFOA because they can use the PFAS atmospheric deposition and consumer products exemption in the RBCRs.

Are the owners correct?

- A. Yes, because research shows that PFAS can be transported through the air, and the PFAS use was related to consumer products.
- B. No, because the PFAS source likely originated from past on-site operations, and the exemptions do not apply.**

Citation References



Discovery Exemptions

- **Residential Parcel Exemption**
 - Provisions - RCSA Sec. 22a-134tt-1(i)(1)
- **Discovery of PFAS/Road salt in public/private drinking water supply**
 - Provisions – RCSA Sec. 22a-134tt-1(i)(2)
- **Discovery of PFAS in land & waters of the state**
 - Provisions – RCSA Sec. 22a-134tt-1(i)(3)

Other Exemptions

- **Incidental Releases - PFAS**
 - Provisions – RCSA Secs. 22a-134tt-1(i)(4)(B) & (C)
- **Incidental Releases – Salt**
 - Provisions – RCSA Sec. 22a-134tt-1(i)(5)(B)

Related Statutes

- **CGS 22a-432**
 - Order to correct potential sources of pollution
- **CGS 22a-471**
 - Pollution of groundwaters. Orders to provide drinking water...
- **CGS 22a-134pp(5)**
 - Release Based Remediation of Hazardous Waste
 - Definition of Person
- **CGS 22a-134ss**
 - Orders. Hearings... Release Based

Upcoming Trainings

Next Up...

Reminder: Registration for upcoming RBCR & REACT Training Available on DEEP's webpage:

[REACT and Release-Based Cleanup Regulation Training](#)

April 2 - June 4
Every Thursday
10:00 a.m. - 12:00 p.m.

REACT

REACT Training during first hour (Various topics:

April 2: Verifications
April 9: LUST E-Forms April 16: Tiering
Additional topics)

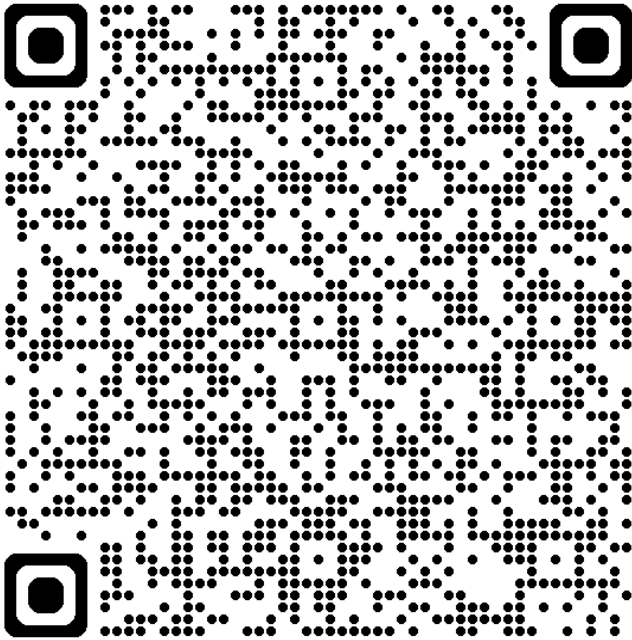
Help Session during second hour

[Register for April, May, June Thursday sessions](#)



Date	Topic	Training Course	Location/Zoom Registration or Access Link	Questions & Answers
April 8, 2026, 10:30 a.m. - 12:00 p.m.	RBCR	Road Salt and PFAS - Focused Session 9	Register for April 8	
April 15, 2026, 10:30 a.m. - 12:00 p.m.	RBCR	Tiering and Fees - Focused Session 10	Register for April 15	
April 29, 2026, 2:00 p.m. - 3:00 p.m.	RBCR	RBCR Office Hours Q&A Session	Register for April 29	
May 6, 2026, 10:30 a.m. - 12:00 p.m.	RBCR	Focused Session 11	Register for May 6	
May 13, 2026, 10:30 a.m. - 12:00 p.m.	RBCR	Scenarios - Focused Session 12	Register for May 13	
May 20, 2026, 2:00 p.m. - 3:00 p.m.	RBCR	RBCR Office Hours Q&A Session	Register for May 20	
June 3, 2026, 10:30 a.m. - 12:00 p.m.	RBCR	Focused Session 13	Register for June 3	
June 10, 2026, 10:30 a.m. - 12:00 p.m.	RBCR	Scenarios - Focused Session 14	Register for June 10	
June 17, 2026, 2:00 p.m. - 3:00 p.m.	RBCR	RBCR Office Hours Q&A Session	Register for June 17	

Questions?



Questions on RBCRs and REACT portal may be submitted using this

[Question submittal tool](#) or

send an email to

DEEP.RemediationDivision@ct.gov or

DEEP.ERR@ct.gov

DEEP.LeakingUST@ct.gov

DEEP.PCBProgram@ct.gov

Responses to submitted questions will be provided in:

- updates to Frequently Asked Questions documents,
- Q&A annexes to training courses, or individually if appropriate.