



# RBCR Focus Session 8

Verifications & Audits: Presented April 1<sup>st</sup>

1. **So are Sitewide Verifications required through REACT? (Even Transfer Act verifications?). The slide indicated Sitewide verifications were still on the normal forms but then Lynn said Sitewide was the other possible dropdown selection that wasn't shown on the slide...**

All verifications are required to be submitted through REACT. PTP and the new Voluntary Parcel Wide program will require completing a Word form that gets uploaded with the Verification in REACT. Release Remediation Closure Report (RRCR) forms are completed entirely within REACT and the report is uploaded on its own (no separate Word form).

2. **There are several ERRs that have been closed in REACT, the Release Remediation Closure Reports (RRCR) do not include an LEP stamp, is a stamp required.**

All LEP verifications must include the LEP stamp. Please either stamp the beginning of the RRCR or include the form - [Release-Based LEP Verification Signature Page](#) which is available on our webpage.

3. **Will this process be the same when submitting verification reports for older programs (Transfer Act sites, old VRP sites, and/or brownfields programs)?**

Yes.

4. **These are closed by LEPs; also, there is no signature. Do PEPs and LEPs have to sign reports?**

Any closure documentation has to be signed. For LEPs, a Release-Based LEP Verification Signature Page is available on our webpage.

5. **Does the request and fee for a no audit letter have to be submitted at the time of submission of the report? Some people may want it after the fact.**

The request for a No Further Audit Letter must be submitted at the time of submitting a RRCR. Note, that we will continue to issue No Audits for PTP and VolX verifications and no fee is required for these.

**6. When should monitoring wells be decommissioned following verification submittal if the audit period can last for up to 2 years (full audit)?**

That's a risk tolerance decision. If the release gets audited, you should know within 180 days. If it is audited, keeping the wells might be advisable until you know the outcome. Whether those wells could be useful for other site conditions is also something that should be considered.

**7. Are audit findings going to be available in REACT?**

Yes.

**8. Slides mentioned data useability evaluation. Can you please confirm that laboratory reports submitted to support a PEP certification require a data usability evaluation?**

Yes. All lab results should be subjected to DQA/DUE.

**9. In REACT how does the cleanup status get updated. Is it just based on uploading milestone reports?**

The cleanup status is based on uploading submittals and properly linking them to the correct milestone. DEEP staff can also manually adjust the status based on audits.

**10. Why is it necessary to provide additional details when uploading a site-wide verification report to REACT when that information is already provided in both the Verification Report AND the accompanying Verification Form?!**

The few fields to fill in allow the software to link the information appropriately in REACT.

**11. If you have to pay the request for no audit letter at the time of the report submittal, how would we know if an audit was going to be conducted or not? If a Full Audit is conducted we would get notification it was accepted. Would we get our request for no audit fee back if an audit is conducted? Also, requiring the no audit fee at the time of the report submittal tends to appear like an incentive for the department of \$500 to not audit... optics?**

The department will issue either a no further audit letter or a notice of audit. If an audit is conducted, an acceptance/rejection will be issued. There is no refund of the fee if an audit is conducted.

**12. Let me start over. No news is good news, but does not create the closure documentation required by the marketplace - lawyers, lenders, buyers, etc. Will the Department reconsider issuing No Audit letter as standard practice?**

No.

**13. Can you go through the any changes in the process for Interim Verifications.**

No changes. Interim verifications are not an option for release-based.

**14. What if the time for an audit has passed? Can you get a no audit letter without paying?**

No. That request, and fee payment has to be made at the time the Release Remediation Closure Report (RRCR) is submitted.

**15. IMO, it seems that if no notice of audit has been received in 180 days from filing, there should be some comfort that there will be no audit beyond screening, no?**

Correct. However, Section 22a-134tt-13(f) provides some conditions under which a verification can be reopened.