



RBCR Training Q&A*

Heating Fuel & PEP: Presented February 18, 2026

1. Could an update be provided on whether LEP credits will be available for this and prior sessions?

CT LEP 645 W is the course number for the approved focused sessions: 1/28, 2/11, 2/18, 2/25, 3/4, 3/11, 3/25, 4/1, 4/8, 4/15. LEPs apply for CECs through EPOC and register for the ZOOM with DEEP for each individual session. LEPs must attend at least two sessions for CECs.

2. In the event the LEP board is able to approve LEP credits for these training sessions, how will we demonstrate attendance to qualify for the credits?

If the LEP registered for the ZOOM through DEEP and attended the focus session that is noted. To receive credit for focus sessions attended (CT LEP 645 W) the LEP must register with EPOC.

3. As this material is so new, will it be on the LEP exam in May?

The May 2026 exam will be based on the regulations in effect prior to March 1, 2026.

4. For an emergent reportable release, can an LEP verify any ERRs, regardless of being on-site?

Yes.

5. "Possible Sediment Sampling"? Will there be additional guidance? Otherwise, would seem to default to required.

The need to sample sediment will depend on the CSM, the extent and degree of impacts to the surface water body, and a determination of whether or not the heating fuel release could have impacted those sediments.

6. Does all impacted soil outside of the building footprint mean to ND or to the appropriate RSR criteria.

When following the special path for residential heating fuel releases (Section 224-134tt-8(b)), all impacted soils that were outside the building footprint will need to be removed to background concentrations, which for many residential properties could be analytical laboratory results of non-detect for heating fuel constituents of concern. Additionally, the nature and extent of the remaining soils beneath the building footprint must be documented and it must be documented that those soils are not impacting groundwater or indoor air.

7. How is "persist" defined (period of time) with respect to impacts to GW from a residential heating fuel release?

Please refer to section 8 of the RBCRs and the presentations and recordings posted to this page for the definition of persistent impact.

8. Please summarize what is so "special" about the special path. How is it different than a non-special path?

The non-special path requires removal of impacted soils from beneath structure footings.

9. Is a groundwater sample required for leaving soil beneath a residential building. How do you verify groundwater is not impacted?

If multiple lines of evidence can be used to confirm no impact to groundwater, a groundwater sample may not be necessary. If groundwater is encountered during soil excavation, a groundwater sampling will be required.

10. For PEP qualification, can you clarify what version of OSHA 30 is required (e.g., OSHA General or OSHA Construction)?

OSHA 30 General Industry is the preferred training requirement.

11. Does competency mean you can actually run or deploy the equipment? Most consultants would not meet this standard.

All permitted spill cleanup contractors (454 permit holders) should have staff that meet this requirement. They are in the business of spill response activities and should have experience and be competent in these activities. PEPs must be listed on a 454 permit or on the GP of a company that has a dedicated spill response department, so this requirement should be easily satisfied.

12. If Immediate Actions are not commenced within 2 hours of discovery of the release, then does the cleanup oversight and release reporting records have to be verified by a LEP?

Yes

13. Is there a way a consultant can obtain a PEP certification? Based on my understanding of the permitting process there is currently not a means for an outside consulting firm to act as a PEP on behalf of another entity (clean up company, large company, etc.)

If they meet the requirements to become a PEP as posted on the Department's website, any individual can be listed on a 454 spill cleanup contractor's permit, or on a company with a spill response department's GP, or on a UST removal contractor's GP.

*Additional questions pending answering/internal review; to be updated regularly and version/publication date will be updated.