



Release-Based Cleanup Regulations Focus Session *LEP Verifications and Audits*

Presented and Prepared by: Claire Quinn, Kevin Vanderveer, Lynn Olson-Teodoro, and Carolyn Fusaro
Remediation Division, WPLR April 1, 2026

TRAINING DISCLAIMER

The following presentation was delivered by the Remediation Division of the Connecticut Department of Energy and Environmental Protection on April 1, 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.

OUTLINE



Definitions



Submitting Verifications through REACT



Audits



No Audit Letters and Reopening
Verifications



Examples

A stylized, colorful landscape illustration. At the top right, a bright yellow sun is partially visible. Below it, a large, vibrant green hillside slopes downwards from right to left. The hillside is outlined with a thick, dark blue border. At the bottom of the image, a light blue area represents water, also outlined with a thick, dark blue border. The overall style is simple and graphic, with flat colors and bold lines.

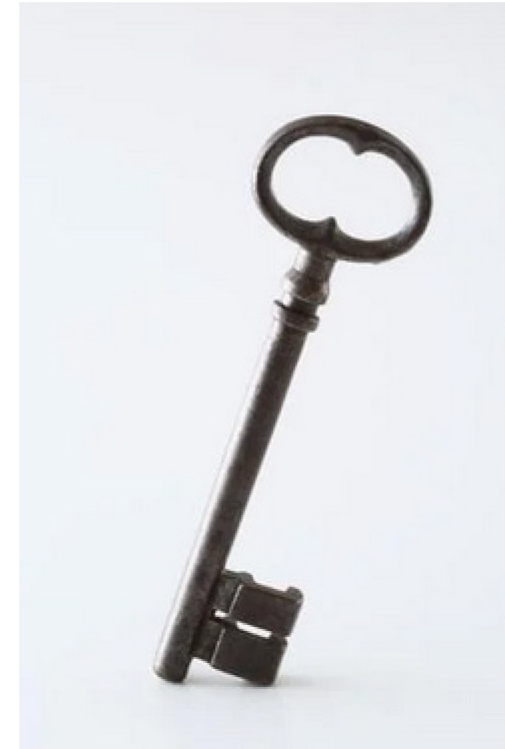
DEFINITIONS

KEY WORDS & DEFINITIONS

Verification means the written opinion of a licensed environmental professional on a form prescribed by the commissioner that the remediation of a release satisfies the standards established in regulations adopted pursuant to section 22a-134tt

Certification means the written opinion of a permitted environmental professional on a form prescribed by the commissioner that the remediation of a release satisfies the standards established in regulations adopted pursuant to section 22a-134tt

Release Record means a document certified by a PEP or verified by an LEP documenting compliance with a requirement of the RCBRs.



WHAT RECORDS ARE VERIFIED OR CERTIFIED?

LEP Can Verify

- **IA reports**
- **Tier assignments (including tier changes)**
- **Release remediation closure reports**

PEP Can Certify

- **IA reports**
- **Release remediation closure reports**

MANNER OF LEP VERIFICATION

- Signing or electronically signing the release record
- Affixing the LEP's seal to the release record
- Providing other information specified on a form prescribed by the commissioner



A stylized, colorful landscape illustration. The top right corner features a bright yellow sun. Below it is a large green hill with a dark blue outline. The bottom of the image shows a light blue body of water, also outlined in dark blue. The text "SUBMITTING VERIFICATIONS THROUGH REACT" is centered on the green hill.

SUBMITTING VERIFICATIONS THROUGH REACT

SITEWIDE AND RELEASE VERIFICATION FORMS

- Sitewide verifications will still use verification forms, found online on DEEP's webpage: [LEP Verifications](#)
- Release verifications are completed within the REACT portal



REACT RELEASE VERIFICATION SUBMITTAL

Case Number: RCN-172738

Submittal

Complete the information below.

* Submittal Category

* Submittal Type

* Release Closure Type

- Select Submittal
- Associate Cases**
- Add Affiliations
- Enter Submittal Information

Case Number: RCN-172738

Release Remediation Closure Report



Submittal Related Cases

Select additional Cases to which this submittal applies i

<input type="checkbox"/>	Case Num... ▾	Status ▾	Agency ID ▾	Case Prog... ▾	Case Addr... ▾	Case Name ▾
<input type="checkbox"/>	RCN-202506	Open		Release-Based		DEEP Release-...
<input type="checkbox"/>	RCN-202560	Open		Release-Based		DEEP Release-...
<input type="checkbox"/>	RCN-202849	Open		Brownfield - A...		DEEP Brownfiel...
<input type="checkbox"/>	DCN-203518	Open		Voluntary Parc...		DEEP Voluntary...

1 – 4 of 4 Displayed

CONFIRM OR CHANGE AFFILIATIONS

Release Remediation Closure Report

Affiliations

Regulated Entity

Account Information

* Name ⓘ

CT, Comptroller, State of

* Address ⓘ

165 Capitol Ave Hartford, CT 06106-1620

* Phone ⓘ

(860) 222-6666

Contact Information

* Name ⓘ

KEVIN VANDERVEER

Title

* Phone ⓘ

Start typing 3 or more characters to search, if not found select "Add New"

* Email ⓘ

kevin.vanderveer@ct.gov

Company/Employer ⓘ

Start typing 3 or more characters to search, if not found select "Add New"

+ Add Additional Regulated Entity

Billing Contact ⓘ

TIER ASSIGNMENT, INDICATE VERIFICATION, AND RECEPTORS

Case Number: RCN 172700

Release Remediation Closure Report

Submittal Information

This submittal is for LEP verification of historical releases or emergent reportable releases

General Release and Closure Information

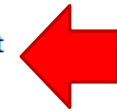
* First Tier Assignment

* I verify, in accordance with CGS §22a-134pp(9) and RCSA §22a-133v-1(z), that the subject and remediated in accordance with RCSA 22a-134tt.

Receptors

Sensitive Receptors w/in 500':

- School
- Recreational
- Residential
- Child care facility
- Healthcare facility
- Significant wetland complexes

 Expect wording to change to “A LEP verified,…”

INDICATE APPLICABLE CRITERIA

Release Compliance

Applicable cleanup criteria

- Res DEC
- MF DEC
- PR DEC
- I/C DEC
- PCB DEC other than Res
- GA PMC
- GB PMC
- Background-soil
- GWPC
- SWPC
- WQS
- Res VolC
- I/C VolC
- Background-Groundwater

ENVIRONMENTAL DATA

* Substances released to soil

- None
- Non-chlorinated VOCs
- Chlorinated VOCs
- Metals
- PAHs
- SVOCs (other than PAHs)
- PCBs
- Petroleum Hydrocarbons
- Pesticides/Herbicides
- PFAS
- Other

* Substances released to groundwater

- None
- Non-chlorinated VOCs
- Chlorinated VOCs
- Metals
- PAHs
- SVOCs (other than PAHs)

Select which soil conditions were exceeded (If applicable)

- Background
- Res DEC
- MF DEC
- PR DEC
- I/C DEC
- GA PMC
- GB PMC

Select which groundwater conditions were exceeded (If applicable)

- Background
- GWPC
- SWPC
- Res VoIC
- I/C VoIC
- Groundwater not impacted

REMEDIATION QUESTIONS AND RRCR UPLOAD

* Was remediation required? ⓘ

Other remedial measure implemented:

* Were exemptions, variances, or alternatives used?

Are you requesting a No Further Audit Letter? (Fee Required)

Document Information

* Upload File (Max File Size: 300MB)

File Name

Document Title

* Date of Document

State

Is this submittal a revision of a previous version?



* Author ⓘ

Cancel

Back

Submit



AUDITS

RCSA 22A-134TT-13 (AUDITS)

KEY WORDS AND DEFINITIONS

The commissioner may conduct an **audit** of **any release record** verified by an LEP or certified by a PEP to determine compliance with Chapter 445b of the Connecticut General Statutes and the RBCRs.



Such audit may be a **screening audit**, a **focused audit**, or a **full audit**.

If no audit is conducted, no notification will be issued.

Audit means the commissioner's review of an LEP verification or PEP certification pursuant to section 22a-134tt-13 of the RBCRs

Release record means a document certified by a PEP or verified by an LEP documenting compliance with a requirement of the RCBRs.

WHAT CAN BE AUDITED PURSUANT TO RBCRs?

Any release record can be audited

LEP Verified Records





- IA reports
- Tier assignments (including tier changes)
- Release remediation closure reports

PEP Certified Records





- IA reports
- Release remediation closure reports

TYPES OF AUDITS AND PROCESS





Screening

-  Review of one release record
-  **No** notice of audit
-  Complete \leq 180 days
-  Accept/Reject or switch to focused/full*

Focused

-  Review of one release record
-  Notice of audit
-  Initiate within 180 days, complete \leq 18 months
-  Accept/Reject or switch to full*

Full

-  Review of multiple release records **AFTER** submission of closure report
-  Notice of audit
-  Initiate within 180 days**, complete \leq 2 yrs
-  Accept/Reject

*A full audit may be initiated only after closure documentation has been received

**Unless continued from a focused audit

SCREENING AUDIT



Administrative completeness screening



Release record is assigned for staff technical screening



Any time DEEP staff review a release record is a screening audit

SCREENING AUDIT: NOTICE, TIMEFRAMES AND SCOPE



No Notice

(If escalated to focused or full audit notice will happen at that time)



DEEP to decide outcome **within 180 days**
from release record receipt



Review all or a portion of a **single** release record

SCREENING AUDIT: POSSIBLE OUTCOMES



Accepted:
No notification of record review



Rejected:
Notification Letter identifying reason(s) for rejection sent to LEP **and** creator/maintainer.
No refund of fees associated with the record.
DEEP may set schedule for new submission of the record (no extensions of any fee deadlines).



Initiate focused or full audit:
Notification Letter sent to LEP **and** creator/maintainer

FOCUSED AUDIT



Review of a single release record



Includes requesting additional information regarding the release

FOCUSED AUDIT: NOTICE, TIMEFRAMES AND SCOPE



Notice of Audit sent to LEP and Creator/Maintainer

Includes reason(s) for the audit – issues found or random selection

Specifies additional information needed for DEEP's review and due date for response



May start after screening audit

Notice sent within **180 days** from date release record received

DEEP to decide on **outcome within 18 months** from date release record received



Review all or a portion of a **single** release record

Can be limited to specific issues

May include an audit meeting

FOCUSED AUDIT: POSSIBLE OUTCOMES



Accepted:

Notification Letter sent to LEP **and** creator/maintainer.



Rejected:

Notification Letter identifying reason(s) for rejection sent to LEP **and** creator/maintainer.

No refund of fees associated with the record.

DEEP may set schedule for new submission of the record (no extensions of any fee deadlines).



Initiate full audit:

Notification Letter sent to LEP **and** creator/maintainer

FULL AUDIT



Initiated after submission of a Release Remediation Closure Report



Review of many or all release records associated with a release



Includes requesting additional information regarding the release

FULL AUDIT: NOTICE, TIMEFRAMES AND SCOPE



Notice of Audit sent to LEP and Creator/Maintainer

Includes reason(s) for the audit – issues found or random selection

Specifies additional information needed for DEEP's review and due date for response



May start within after **180 days** from date release remediation closure report received

Any time before focused audit reaches an outcome

DEEP to decide on **outcome within 2 years** from date release remediation closure report received



Review all or a portion of **multiple** release records

Can be limited to specific issues

May include an audit meeting

FULL AUDIT: POSSIBLE OUTCOMES



Acceptance of release remediation closure report:
Notification Letter sent to LEP **and** creator/maintainer.



Rejection of one or more release records associated with the release:
Notification Letter identifying reason(s) for rejection sent to LEP **and** creator/maintainer.
No refund of fees associated with the record.
DEEP may set schedule for new submission of the records (no extensions of any fee deadlines).

KNOWLEDGE CHECK



What is the definition of “release record”?

- a. document certified by a PEP or verified by an LEP documenting compliance with a requirement or requirements of the RBCRs
- b. an environmental report submitted to DEEP
- c. documents pertaining to emergency response
- d. a release report

KNOWLEDGE CHECK - ANSWER

What is the definition of “release record”?

- a. Document certified by a PEP or verified by an LEP documenting compliance with a requirement or requirements of the RBCRs**
- b. An environmental report submitted to DEEP
- c. Documents pertaining to emergency response
- d. A release report

KNOWLEDGE CHECK



True or False:

LEP verification carries more weight than PEP certification.

KNOWLEDGE CHECK - ANSWER

LEP verification carries more weight than PEP certification.

False

KNOWLEDGE CHECK



Which type of audit may be commenced by DEEP without notice to the person who verified or certified the release record or the person who created or maintained the release?

- a. screening audit
- b. focused audit
- c. full audit
- d. none of the above

KNOWLEDGE CHECK

Which type of audit may be commenced by DEEP without notice to the person who verified or certified the release record or the person who created or maintained the release?

- a. Screening audit**
- b. Focused audit
- c. Full audit
- d. None of the above

A stylized landscape illustration. The top right corner features a yellow sun. Below it is a large green hill with a dark blue outline. The bottom of the image shows a light blue area representing water, also with a dark blue outline. The text is centered on the green hill.

**NO AUDIT LETTERS AND
REOPENING VERIFICATIONS**

No Further Audit Letters



Requested when submitting a release remediation closure report. Requests submitted through REACT (= form **prescribed by** the commissioner) with a non-refundable fee of \$500 (**e-payment** portal)



Issued after determining that a focused or full audit is not necessary; screening audit will not be conducted after issuing a no audit letter



Goal for issuing no audit/audit determination ≤ 90 days after request submitted

No FURTHER AUDIT LETTERS FOR SALE OF SINGLE-FAMILY HOMES



For **release records** submitted documenting remediation conducted for a **single-family home** with **signed purchase and sale agreement**:

≤ 3 days

Commissioner determine whether to conduct an audit and issue **notice of audit letter**

≤ 14 days

If **audit** conducted, issue **audit outcome**
If audit outcome not issued, release record considered **accepted**

REOPENING VERIFICATIONS & CERTIFICATIONS

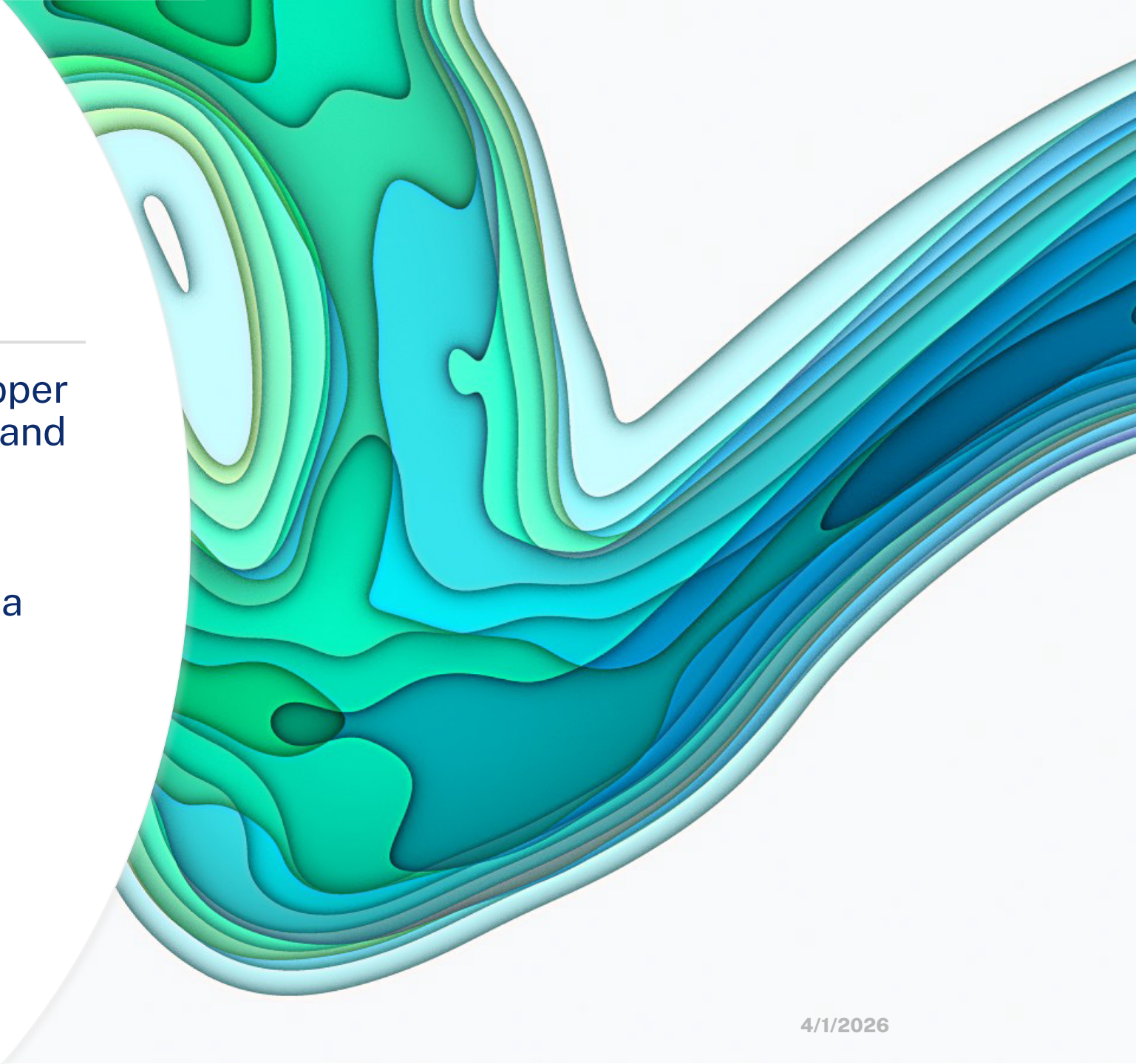
- ❑ A verified or certified record relied on inaccurate or misleading information
- ❑ A verification is submitted for a Release Based Program Order (CGS 22a-134ss)
- ❑ Required post-verification monitoring or operation & maintenance was not completed
- ❑ A verification relied on an EUR that was not recorded
- ❑ A violation of the Release Based Program is identified (CGS 22a-134qq to 22a-134tt)
- ❑ Remediation failed to prevent a substantial threat to public health or the environment

A stylized, colorful landscape illustration. The top right corner features a bright yellow sun. Below it is a large, vibrant green hill. The bottom portion of the image is a light blue area representing water, with a dark blue wavy line separating it from the green hill. The word "EXAMPLES" is centered in white text on the green hill.

EXAMPLES

EXAMPLE #1

A 250-gallon tote of waste oil and copper solution spills into a paved truck well and catch basin during loading. The catch basin is a drywell, and the base is just below the water table. The release is cleaned up and certified as closed by a PEP.



EXAMPLE #1 AUDIT

A 250-gallon tote of waste oil and copper solution spills into a paved truck well and catch basin during loading. The catch basin is a drywell, and the base is just below the water table. The release is cleaned up and certified as closed by a PEP.

- The closure report is audited.
- A waste oil/copper release contacting the water table cannot be certified by a PEP.
- The certification is rejected.
- Verification by an LEP is required.

22a-134tt-13(g)

EXAMPLE #2

The Department's review of a release record initially suggests that a data useability evaluation is missing, but later in the review, it is found merged into another appendix.

EXAMPLE #2 AUDIT

The Department's review of a release record initially suggests that a data useability evaluation is missing, but later in the review, it is found merged into another appendix.

- This review is a screening audit.
- The audit is closed because the information was found.
- Because it is a screening audit, notice is not provided to the LEP or creator/maintainer.

22a-134tt-13(b)(1)(A)

EXAMPLE #3

During a screening audit of a tier reassignment from 2 to 3, it is found that soil has been remediated to passive recreation DEC but no EUR or easement was recorded. Additional information is needed.



EXAMPLE #3 AUDIT

During a screening audit of a tier reassignment from 2 to 3, it is found that soil has been remediated to passive recreation DEC but no EUR or easement was recorded. Additional information is needed.

- A focused audit will be initiated within 180 days of the submission date.
- The LEP and creator/maintainer will be notified in writing.
- Only the submitted record will be audited.
- The audit will be concluded within 18 months from the submission of the release record.

22a-134tt-13(a)(2)(B) and -13(c)

KNOWLEDGE CHECK



In Example 3, could a full audit have been done instead of a focused audit?

- a) Yes
- b) No

Answer: b) No

A full audit can only be done on a release remediation closure report.

22a-134tt-13(a)(2)(C)

Example 3 - During a screening audit of a tier reassignment from 2 to 3, it is found that soil has been remediated to passive recreation DEC but no EUR or easement was recorded. Additional information is needed.

- **Focused audit** - initiated within 180 days of document receipt, written notification, one record or specific issue, concluded w/in 18 months.
- **Full audit** - initiated within 180 days of closure report receipt, written notification, any/all release records, concluded w/in 2 years.

EXAMPLE #4

During a screening audit of a release remediation closure report, it is found that a site has been remediated to passive recreation criteria; however, baseball fields have been built over the release area.

EXAMPLE #4 AUDIT

During a screening audit of a release remediation closure report, it is found that a site has been remediated to passive recreation criteria; however, baseball fields have been built over the release area.

- A full audit will be initiated within 180 days of the submission date.
- The LEP and creator/maintainer will be notified in writing.
- Any or all release records may be audited.
- The audit will be concluded within 2 years from the submission of the closure report.

22a-134tt-13(a)(2)(C) and -13(d)

KNOWLEDGE CHECK



In Example 4, could a focused audit have been done instead of a full audit?

- a) Yes
- b) No

Answer: a) Yes

But a full audit can save further notification if additional documents need to be considered.

Example 4 - During a screening audit of a release remediation closure report, it is found that a site has been remediated to passive recreation criteria; however, baseball fields have been built over the release area.

- **Focused audit** - initiated within 180 days of document receipt, written notification, one record or specific issue, concluded w/in 18 months.
- **Full audit** - initiated within 180 days of closure report receipt, written notification, any/all release records, concluded w/in 2 years.

UPCOMING TRAININGS

Next up:

Reminder: Registration for upcoming RBCR & REACT Training Available on our webpage:

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

Date	Topic	Training Course	Location/Zoom Registration or Access Link
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
April 2 - June 4 Every Thursday 10:00 a.m. - 12:00 p.m.	REACT	<p>REACT Training first hour (Intro plus topics based on previous RBCR trainings; April 2: Verifications; April 9: LUST E-Forms; April 16: Tiering)</p> <p>Questions and Help Session during second hour</p>	Register for April, May, June Thursday sessions

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

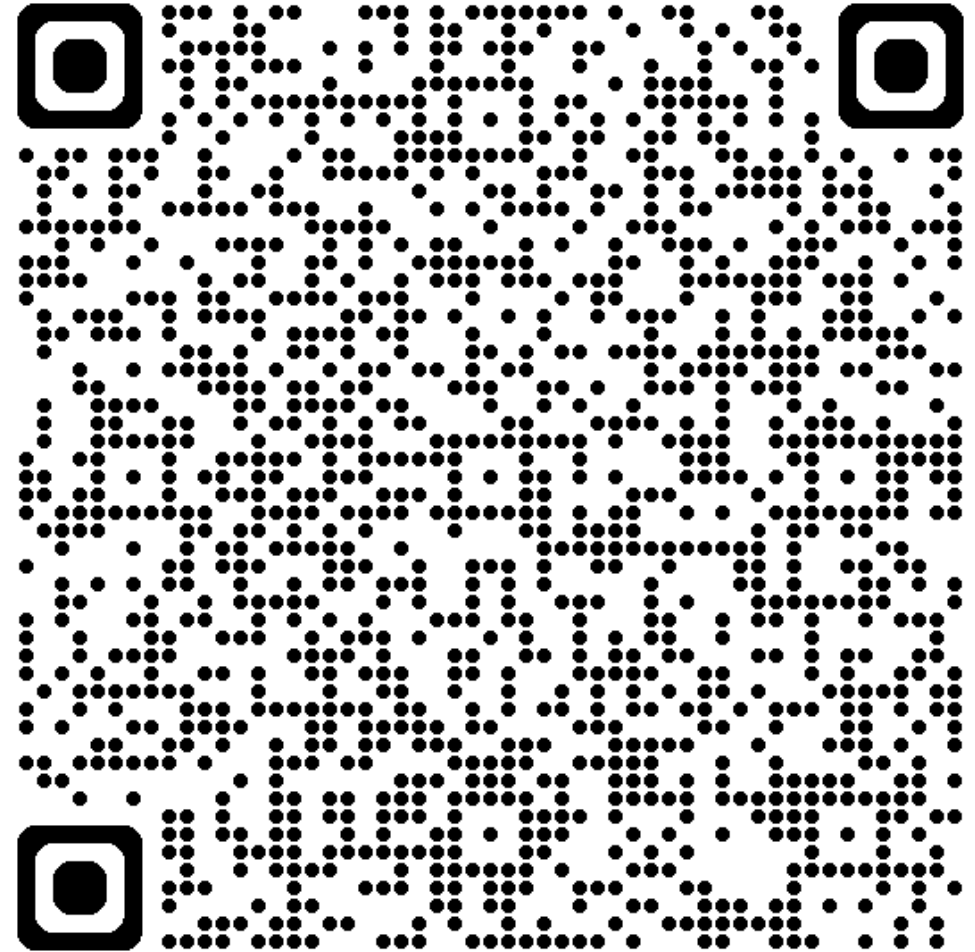
DEEP.LeakingUST@ct.gov

DEEP.PCBProgram@ct.gov

DEEP.REACT@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.



A stylized landscape illustration. The top right corner features a bright yellow sun. Below it is a large green hill with a dark blue outline. To the left, a smaller, lighter green hill is partially visible. The bottom of the image shows a blue body of water, also outlined in dark blue. The text "THANK YOU!" is centered on the green hill.

THANK YOU!