Department of Energy & Environmental Protection
Remediation Division
Roundtable
Q&A Newsletter

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Presented below are the Department's responses to verbal comments made at the Remediation Roundtable held on February 24, 2015, as well as selected written comments received by the Remediation Roundtable Planning Committee. The comments and responses may have been edited for clarification purposes.

SELECTED VERBAL COMMENTS FROM THE FEBRUARY 24, 2015 ROUNDTABLE:

Proposed "Wave 2" RSR Amendments

Comment: Is there any plan to expand the upgradient policy to include upgradient soil impacts and not just groundwater?

Response: *DEEP has not considered that, but we are willing to hear suggestions.*

DECD's Brownfields LEAN Report Out

Comment: When will there be a comprehensive list of brownfields that have received DECD funding on the webpage?

Response: *There is currently a list of financial assistance agreements for brownfield projects from April 5, 2005 through December 31, 2014 on the DECD website located at* ***https://data.ct.gov/Business/Brownfield-Portfolio-Point-Map/6y9f-s6ck***

Background Workgroup Report Out: Early Concepts

Comment: In considering background status, is the Workgroup considering leachability concentrations of inorganics?

Response: *Yes. That is being considered.*

General Question and Answer

Comment: What is the status of the revisions to the No Audit letter?

Response: *The No Audit Letter has been slightly modified for clarification purposes, as requested.*

SELECTED WRITTEN QUESTIONS:

Comment: DEEP has approved the use of ETPH, VPH, EPH and APH analytical methods and associated criteria as an additional polluting substance (APS) to characterize petroleum releases. For example, based on DEEP's latest guidance posted on the Analytical Methods Used to Characterize Petroleum Releases webpage, the following three analytical suites are suggested to characterize a gasoline release in a GB Area:

Option 1: VPH Carbon Ranges and target compounds;

Option 2: VPH Carbon Ranges and EPA Method 8260 (target compounds); **or**

Option 3: EPA Method 8260 (target compounds)

If the three analytical method suites listed above are acceptable to DEEP for assessing gasoline contamination are these methods and the results interchangeable?

Response: *All the methods are options for characterizing a gasoline release in a GB Area where the release is not potentially impacting a water supply well. It is also important to include other analytical methods, as needed, based on the conceptual site model to evaluate additives and volatile organic compounds when the release may be impacting a water supply well.*

Analytical results in some cases are not comparable because of the differences in the analytical methods and the associated results. For example, if you choose to use EPA Method 8260 alone to characterize a site with a release of petroleum, some compounds will be missed that would be reported by the VPH Method (carbon ranges and target compounds). More comprehensive information about the types and quantity of petroleum will be reported using the VPH method. Please refer to the Analytical Methods Used to Characterize Petroleum Releases webpage for additional guidance.

Comment: How do the suggestions from the Risk-Based Decision-Making Assessment report dovetail with the Transformation process?

Response: *The Risk Report will inform the Wave 2 RSR amendments that are part of DEEP's ongoing Remediation Transformation that began several years ago. The Department is actively working on implementing suggestions from the report such as developing a list of Additional Polluting Substances and Alternative Criteria to be published this June, guidance documents regarding Ecological Risk Assessments, as well as continued development of flexible, risk-based management approaches to meeting the RSRs, which will be part of the Wave 2 RSR Amendments.*