



**Department of Energy & Environmental Protection
Remediation Division
Remediation Roundtable
Q&A Newsletter
Vol. 26, October 10, 2017**

Presented below are the Department's responses to verbal comments made at the Remediation Roundtable held on June 20, 2017. The comments and responses may have been edited for clarification purposes.

SELECTED VERBAL COMMENTS FROM THE JUNE 20, 2017 ROUNDTABLE:

2017 Legislative Update

Comment: Did the Wave 2 amendments get acted upon by the Legislature?

Response: *The proposed changes to the RSRs are regulations, so as such, they only go through the Legislature's Regulation Review Committee at the very end of the adoption process. DEEP has not yet started the Wave 2 public comment process, and will notify the public when the public comment period begins.*

Comment: Will the EUR statute changes that DEEP proposed in 2017 get passed in next year's legislative session?

Response: *DEEP proposed an amendment to increase the availability of the Notice of Activity and Use Limitation. We were not aware of any opposition to the proposed changes. It was not enacted by the legislature in the last session. We have not decided whether it will be part of the package of legislation to be proposed by DEEP next year.*

Electronic and Hardcopy Transmittal of Documents

Comment: If a site has multiple REM IDs, which one should be used on the cover sheet required for the new electronic document submissions?

Response: *The REM ID is used for site identification, so we do not need a filing to include every ID associated with a site. List the primary ID associated with your client's activities (for example, the ID associated with the specific transfer filing for which the report is being submitted). You may list a couple of secondary IDs, if available.*

Comment: Will the electronic documents be searchable externally on the internet?

Response: *We hope that eventually they will be, but that is currently being handled by another state agency. For now, you are able to search for documents from a computer in our DEEP file room.*

Comment: Will the public be able to view, copy, and print them?

Response: *It will be handled in the same way as manifests are presently accessed by computer in the DEEP file room; they will be able to be viewed on computers in the file room and will be able to be printed for a "per page" fee.*

Comment: How will we be able to add a transmittal form to a document if it is in a locked PDF format?

Response: *Adobe Professional allows you to attach a cover sheet to a locked document, or if working in Word, it can be inserted.*

Roundtable Tips- Groundwater Monitoring

Comment: If DEEP does not want 15-foot screens used for monitoring across the watertable, what is considered appropriate?

Response: *While shorter screens are preferable to assess more specific portions of an aquifer, the Department is not forbidding the use of 15 foot screens. If 15-foot screens are used for compliance purposes, we do expect explanation and justification that these wells are providing a representative groundwater sample.*

Poly- and Perfluorinated Alkyl Substances (PFASs) Briefing on CT Regulatory Status

Comment: Has DEEP looked at carwashes as a potential source for PFAS?

Response: *We have not yet started that work, but it is something we will be researching.*

Comment: Is DEEP considering PFAS precursors?

Response: *There is a testing method that oxidizes certain longer-chain, polyfluorinated compounds, also called precursors, thereby transforming and degrading them into shorter chain, perfluorinated carboxylic acid end products that can be measured. This Total Oxidizable Precursors (TOP) analysis is not EPA approved, and we do not have the ability to certify labs to do the analyses. This type of analysis is a good idea in that it has the benefit of giving a sense of other PFASs that are present in a sample that are not quantified by the standard EPA Method 537 analysis. Some universities and labs can do the TOP analysis. ITRC is planning on releasing additional fact sheets on PFASs, including sampling methods, later this summer and fall, so we will be interested in finding out what sampling and analytical methods are recommended in those documents. In addition, EPA is in the process of developing additional laboratory methods for PFASs in media other than drinking water.*