

Remediation Roundtable

March 23, 2021





Remediation Roundtable Agenda

➤ Updates

- Release-Based Clean Up Program Regulation Development
- Environmental Use Restriction Regulations
- Remediation Standard Regulations
- PFAS Action Plan

➤ Roundtable Tips

- Electronic Document Submittals
- Submitting Your Stewardship Permit Application

➤ Division Personnel Changes



Web Updates

Release-Based Clean Up Program Regulation Development webpages

- Working Group meetings, Zoom links, and Zoom recordings
- Topical Subcommittee meetings, Zoom links
- Issues to be discussed
- Legislative Authorization & Background
- Information for Stakeholders
- Lists of members



Web Updates

➤ General Permit for In Situ Remediation

➤ In Situ Groundwater Remediation: Enhanced Aerobic Biodegradation Permit Extension

➤ **NEW!** 2-page [In Situ Remediation Report of Monitoring Activity Form](#) to make reporting easy

➤ Connecticut Remediation Standard Regulations

➤ Updates regarding the revised regulations

➤ LEP Verifications



Web Updates

Request Form for Approval of Criteria for Additional Polluting Substances and Certain Alternative Criteria

optional and any person may elect to apply for a different criterion for a substance if that adequate documentation to support such request is submitted to the Department.

Substance	Res DEC (mg/kg)	I/C DEC (mg/kg)	GA PMC (mg/kg)	GB PMC (mg/kg)	RSVVC (ppmv) ¹	I/CSVVC (ppmv) ¹
Acenaphthene	1,000 <input checked="" type="checkbox"/>	2,500 <input type="checkbox"/>	8.4 <input checked="" type="checkbox"/>	84 <input type="checkbox"/>	13 <input checked="" type="checkbox"/>	110 <input type="checkbox"/>
Acetone						
Acetonitrile	340 <input type="checkbox"/>	1,000 <input checked="" type="checkbox"/>	0.70 <input type="checkbox"/>	7.0 <input checked="" type="checkbox"/>	14 <input type="checkbox"/>	140 <input checked="" type="checkbox"/>
Acrolein	34 <input type="checkbox"/>	1,000 <input type="checkbox"/>	0.20 <input checked="" type="checkbox"/>	2.0 <input type="checkbox"/>	0.003 <input type="checkbox"/>	0.035 <input type="checkbox"/>



Questions or Comments?

Please type your Questions into CHAT

If we need further clarification we may
take you off mute to speak

www.ct.gov/deep/remediationroundtable

Release-Based Clean Up Program Regulation Development Updates

March 23, 2021
Graham J. Stevens
Remediation Roundtable




Connecticut Department of Energy and Environmental Protection

20 BY 20

- Final report was released
- DEEP hosted a virtual event and presentation can be found at:

<https://portal.ct.gov/DEEP/About/20-by-20/20-by-20>



20 BY 20

20 GOALS
aimed at increasing **predictability**,
efficiency, and **transparency** of
DEEP's regulatory processes
TO MEET IN 2020



RSRs & EURs – 20BY20 Goal #5

- Adopted February 16, 2021!
- <https://portal.ct.gov/DEEP/Remediation--Site-Clean-Up/Remediation-Standard-Regulations/Proposed-Amendments-to-the-RSRs-and-EURs>
- More details coming up



Spill Reporting Regulations – 20BY20

Goal #20

- Public Comment process started March 11, 2021!
- Hearing is April 27, 2021 at 1:30 pm on Zoom
- Written comments due:
 - May 10, 2021 by 5 pm
- Information linked [here](#)

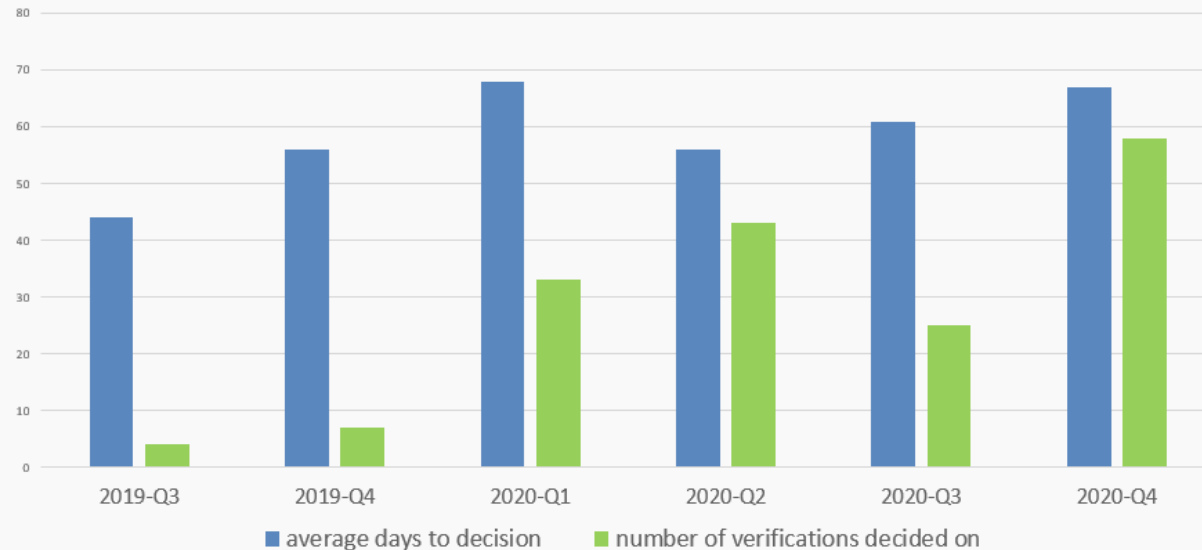


Reduce Transfer Act Audit Time – 20BY20 Goal #4

190 Day Reduction in Pre-and Post- 20BY20 Average

6 Quarter Avg. prior to 20BY20:
247 days

6 Quarter Avg. since 20BY20:
57 days



**PREDICTABILITY, EFFICIENCY,
& TRANSPARENCY**

Realigning CT's Cleanup Program



Public Act No. 20-9

- Enacted during the September Special Session
- Further streamlines Transfer Act – Section 1 through 14
- Creates release-based authorization – Section 15 through 23
- Release-based program only goes into effect once regulations are adopted



Release-Based Working Group

- Public Act No. 20-9 of the Sept. Special Session created a working group to assist in formulating the concepts and approaches that will be the basis for the program regulations
- DECD and DEEP have co-convened a working group that meets the second Tuesday of each month from 1 pm to 2:30 pm
- Public participation is encouraged
- Recordings of past meetings posted online along with other materials

<https://portal.ct.gov/DEEP/Remediation--Site-Clean-Up/Comprehensive-Evaluation-and-Transformation/Release-Based-Clean-Up-Program-Regulation-Development>

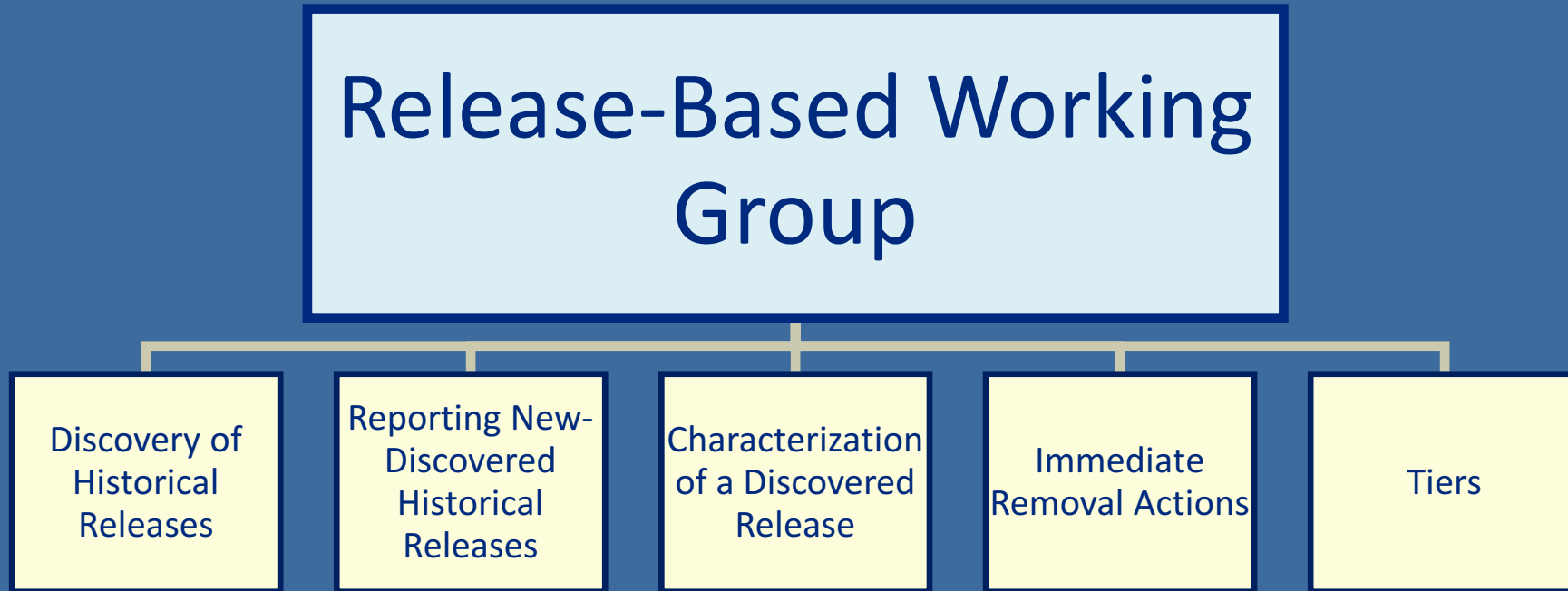


Section 19 - Regulations

- Sets out scope of Commissioner's authority to adopt regulations concerning: 1) reporting, 2) remediation standards, 3) verifications and audits, 4) tiering of releases, and 5) fees
- Provides significant guidance on each topic listed above to form “guardrails” for regulations

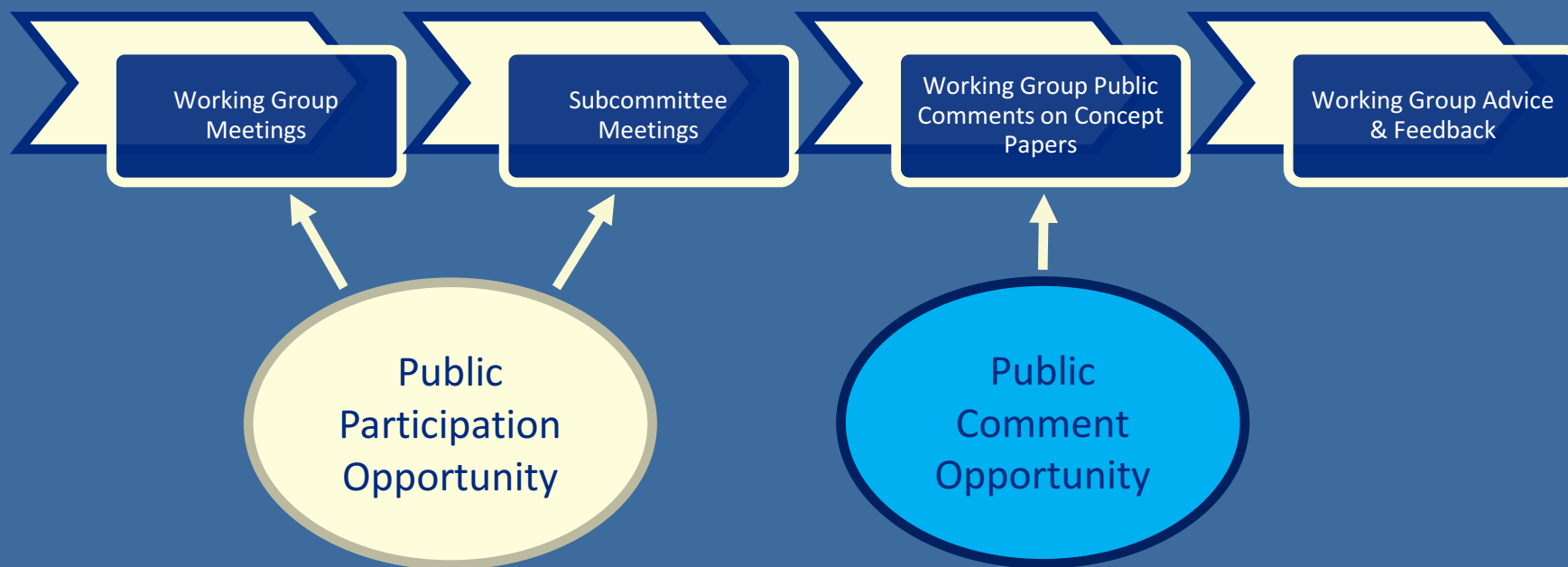


Working Group and Subcommittees

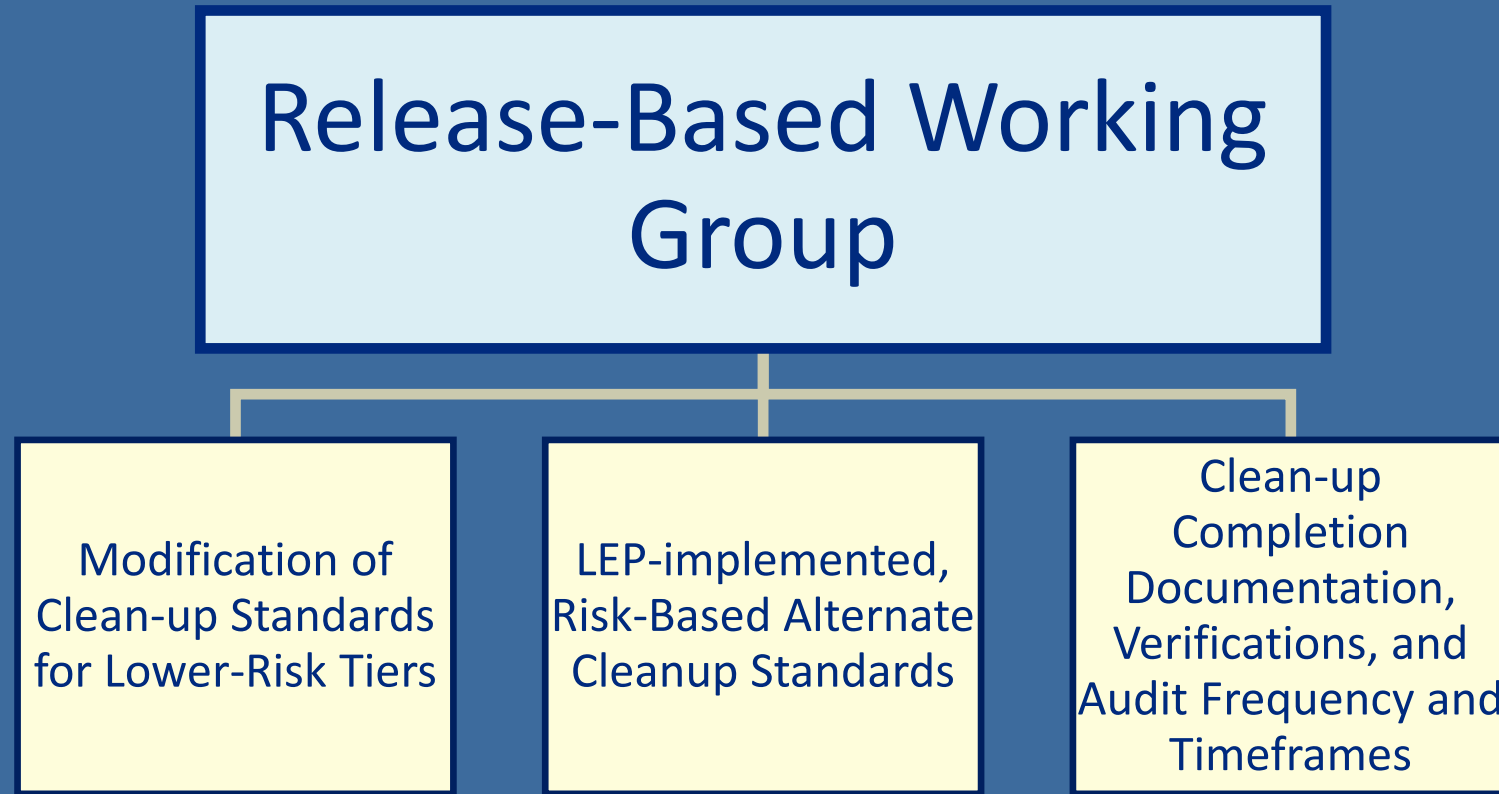


Working Group – Advice & Feedback

First Phase Subcommittee Process



Draft Second Phase Subcommittees





I am happy to take your questions
Please type your Questions into CHAT
After the presentation you can email me directly at:
graham.stevens@ct.gov

Formal feedback can also be sent to:
DEEP.Cleanup.Transform@ct.gov





Environmental Use Restriction Regulations Effective February 16, 2021

Jade Barber
Environmental Analyst 2
Remediation Division



EUR Regulations - Background

- ▶ Authority to issue the EUR Regulations is found in Conn. Gen. Stat. § 22a-133q.
- ▶ Requirements for EURs found in Conn. Gen. Stat. § 22a-133q and § 22a-133o





Why the EUR Revision?

- Key part of the overall DEEP “Transformation” process
 - Companion regulation to the Wave 2 RSRs
- The proposed EUR Regulations:
 - Replace outdated existing regulations
 - Make important process improvements, and
 - Allow, for the first time, use of Notice of Activity and Use Limitations (NAULs)

NEW!



Outline of the Regulations

- ▶ § 22a-133q-1 – Definitions
- ▶ § 22a-133q-2 – Environmental Land Use Restrictions (ELURs)
- ▶ § 22a-133q-3 – Notice of Activity and Use Limitations (NAULs)
- ▶ § 22a-133q-4 – Surveys
- ▶ § 22a-133q-5 – EUR Opinion (former Decision Document)
- ▶ § 22a-133q-6 – Allowable Disturbances
- ▶ § 22a-133q-7 – Releases and Terminations
- ▶ § 22a-133q-8 – Post-Recordation Inspections and Corrective Actions
- ▶ § 22a-133q-9 – Miscellaneous Requirements
- ▶ **Appendix 1 & Appendix 2** – Templates for ELUR and NAUL



Definitions

➔ 30 Definitions

- ➔ Definitions for terms originating in the EUR Regulations
- ➔ Specific definitions from RSRs incorporated with a catch-all for other necessary terms
- ➔ New definitions for legal terms such as: interest, record and subordination agreement

(USAGE)
def-i-ni-tion /deɪˈfɪnɪʃən/
that says exactly what a word, phrase
definition in a dictionary | [+ of] No one
with a satisfactory definition of terror
nition if something has a particular
it must have that quality because
A message that cannot



ELURs

- ➔ Reflects former process with **IMPROVEMENTS**
- ➔ Describes:
 - ➔ Specifies documents which must be prepared - and who must prepare them - including title search, title evaluation, subordination agreements, survey, and EUR opinion
 - ➔ Process for submission of supplemental required or necessary information (including subordination agreements)
 - ➔ Specific decision-making criteria for Commissioner's approval
 - ➔ Process for recording ELUR after acceptance – with specific timelines (some statutory) for each step to ensure title work does not become stale



ELURs

- ▶ Improvements to former process:
 - ▶ Frontloading of subordination agreements
 - ▶ Process for requesting and providing additional information
 - ▶ Timelines associated with recording
- ▶ Process for LEP approval of an ELUR when permitted by General Statutes § 22a-133y



NAULs

- ▶ NAUL is different than an ELUR because:
 - ▶ State does not obtain an interest in property
 - ▶ Can be approved by an LEP or Commissioner
- ▶ Sets out process for Commissioner and LEP approval of a NAUL
 - ▶ Commissioner approval process largely mirrors ELUR process
 - ▶ LEP approval process relies on LEP and title attorney to ensure statutory requirements are satisfied
 - ▶ Contains process for recording a NAUL after acceptance – with specific timelines for each step to ensure title work does not become stale





Surveys

- ▶ Contains detailed requirements for surveys
- ▶ Section is intended to serve as a checklist for a surveyor and to minimize back and forth with the Department and the need to perform multiple rounds expensive of field work
- ▶ Subsection (a) details general requirements for surveys





Surveys

- ▶ Subsections (b), (c), and (d), contain specific requirements depending on the type/size of EUR:
 - ▶ (b) Specific standards and requirements for surveys when the aggregate size of the subject area(s) is fifty percent to one hundred percent (50% to 100%) of the parcel
 - ▶ (c) Specific standards and requirements for surveys when the aggregate size of the subject area(s) is less than fifty percent (< 50%) of the parcel
 - ▶ (d) Specific standards and requirements for surveys when residential activity is the sole restriction
- ▶ Subsection (e) requires preparation of a “simplified survey” which is a summary sheet showing the most important information



EUR Opinion



- ➔ Replaces “Decision Document”
- ➔ Prepared and signed by LEP, recorded on the land records
- ➔ Sets out context for the site, pollutants present, and restrictions imposed on each subject area
- ➔ Specifies the restrictions and obligations imposed



Allowable Disturbances

- ▶ LEP implemented mechanism to allow activities that may otherwise violate the provisions of an EUR
- ▶ Allows excavation that would be otherwise prohibited by an EUR if it is limited in area, depth, duration, and frequency
- ▶ Requires notice to the Commissioner (but not Commissioner's approval) and provides Commissioner an opportunity to provide comment





Allowable Disturbances

- Provides detailed instructions for management of polluted soil
- Requires preparation of completion report when activities are concluded
- Clarifies Department's enforcement tools in event of non-compliance





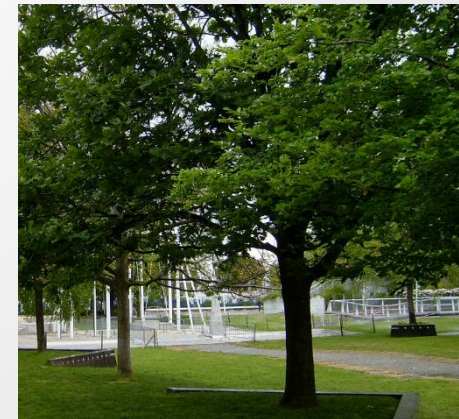
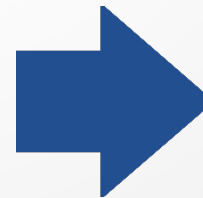
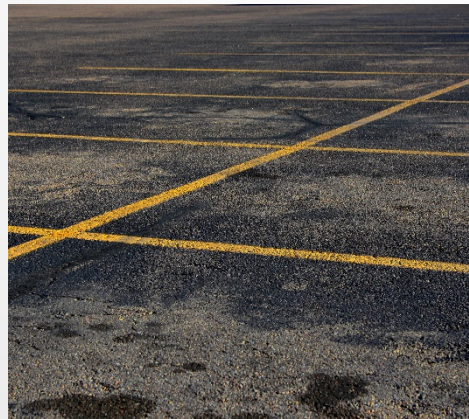
Releases and Terminations

- ▶ Sets out process for obtaining authorization to conduct work otherwise prohibited by an EUR and too large in scope, duration or frequency to be an allowable disturbance
 - ▶ Identifies specific documents which must be prepared – and who must prepare them
 - ▶ Sets out standards for approval
 - ▶ Allows for approval by an LEP of certain releases of an NAUL (limited by frequency and duration of activities)
 - ▶ Allows Commissioner to approve releases for recurring activities when appropriate
 - ▶ Contains process for recording temporary release – including a termination date
 - ▶ Requires preparation of completion report when activities are concluded
 - ▶ Clarifies Department's enforcement tools in event of non-compliance



Releases and Terminations

- Sets out process for permanently releasing an ELUR or terminating an NAUL if additional remediation has been performed so that such EUR is no longer necessary
- Includes a process for replacing one restriction with a new one if a different approach to remediation is used





Post-Recordation Inspections and Corrective Actions

- ▶ Requires annual inspections by owner of a parcel and inspections by an LEP every five years

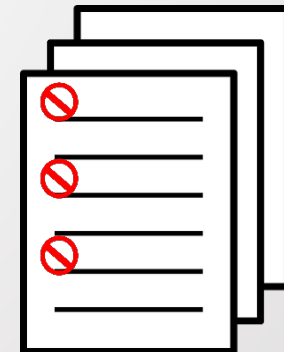


- ▶ Sets out process for identifying, reporting and correcting any issues discovered



Miscellaneous Requirements

- Requires posting of EUR factsheet in occupied building on parcel and that copies be provided to person responsible for health and safety of workers on site
- Sets out schedule for retention of documents related to EUR
- Specifies what documents must be provided to new holder of an interest in a parcel subject to an EUR, including a new owner





Miscellaneous Requirements

- ▶ Allows for review of records by Commissioner



- ▶ Contains exemption from fees for remediation projects with certain public funding streams or owners



Appendix 1 & Appendix 2

- Contains the actual language to be executed and recorded on the land records to implement an ELUR or a NAUL

Declaration of Environmental Land Use Restriction and Grant of Easement

After Recording Return to:
Environmental Land Use Restriction Coordinator
State of Connecticut Department of Energy & Environmental Protection
Remediation Division
Bureau of Water Protection and Land Reuse
79 Elm Street
Hartford, CT 06106

DECLARATION OF ENVIRONMENTAL LAND USE RESTRICTION
AND GRANT OF EASEMENT

This Declaration of Environmental land use restriction and Grant of Easement is made this _____ day of _____, 20____, between _____ (the "Grantor") and the Commissioner of Energy & Environmental Protection of the State of Connecticut (the "Grantee").

WITNESSETH:

WHEREAS, Grantor is the owner in fee simple of certain real property (the "Property") described below:

Street address:
City/Town:
State: Connecticut
Assessor's Map
Block
Lot
and/or
Assessor's Account Number:
Volume and Page of Deed:

A description of the property is attached hereto as Exhibit A, and which is made a part hereof, and

WHEREAS, the Grantee has the authority to enter into this declaration of environmental land use restriction pursuant to sections 22a-5, 22a-6, and 22a-133b of the General Statutes; and

Declaration Document - 1



Summary of Fees

- ▶ Commissioner approved:
 - ▶ ELUR - \$5,000
 - ▶ NAUL - \$5,000
 - ▶ EUR Temporary Release - \$1,000

- ▶ LEP Approved:
 - ▶ ELUR – Waiver request - \$2,500.
 - ▶ NAUL - \$1,500





On-line Materials

- ▶ Currently updates are being added to the RSR webpage to assist in implementation and use of the new regulations:

www.ct.gov/deep/rsr

WHEN?

- ▶ New forms will be posted on the Website as soon as they become available
- ▶ Please do not submit anything new using ~~old Forms~~





Secure File Transfer Site

- All new EUR submittals should be submitted through the Secure File Transfer (SFT) Site

[SFT Site](#)

- If you have received comments or questions from a specific staff member, responses can be sent directly to that person



ELURs submitted pre-2/16/21

- Per 22a-133q-2(h) - the following deadlines must be met or the ELUR will be deemed disapproved, and a new request will need to be submitted
 - Information requested by DEEP after 2/16/21 needs to be provide in 120 days. If a subordination is required, the applicant will have 180 days to provide the subordination
 - A single 60 day extension may be requested



Questions or Comments?

For further questions on EURs please email
jade.barber@ct.gov

Please type your Questions into CHAT

If we need further clarification, we
may take you off mute to speak

www.ct.gov/deep/remediationroundtable



Wave 2 RSRs Transition (effective February 16, 2021)

Kevin Neary

Supervising Environmental Analyst
Eastern District
Remediation Division



Wave 2 RSRs Transition

When can the new amendments be used?

- ➔ New amendments took effect on February 16th and can be used after that date

How do I submit a request using the newly adopted provisions?

- ➔ For now, use the current [Electronic Document Transmittal Form](#), select “Request for Approval under RSRs”, and be sure to include the information required for the new provision. (New forms being developed)



Wave 2 RSRs Transition

How will the transition language for VolC work?

- ➔ RAP needs to have been submitted prior to Feb. 16th
- ➔ No remediation necessary or if remediation is necessary, it needs to be completed on or before February 16, 2023
- ➔ Verification must be submitted by February 16, 2026, (or any deadline set by Program/Order, whichever is sooner)

NOTE: VolC transition only for criteria/applicability depth



Wave 2 RSRs Transition

How will prior RSRs Approval Requests be handled?

- Requests received before Feb 16th will be processed using the RSRs in effect at the time of the request

Public notice was done before the changes, what needs to be done?

- New public notice is not required for those provisions
- Public notice would be required for provisions not included in the prior public notice
- “Additional public notice” may be required



Wave 2 RSRs Transition

Does a verification submitted prior to Feb. 16th need to be resubmitted?

- ➔ No, the verification attests compliance with the RSRs in effect at the time of submittal

If you hear back from DEEP and need to submit a revised verification, the regulations at the time of the original submittal apply

- ➔ Unless the verification is audited and deemed deficient; then the part of the verification that is deficient needs to comply with the new regulations



Wave 2 RSRs Transition

For a verification submitted after Feb. 16th, which RSRs must compliance be verified with?

- ➔ Verification must verify compliance with the newly adopted RSRs
- ➔ However, if verification relies on a Commissioner Approval or ELUR obtained under the prior regulations, those prior approvals/ELURs may be used even if the requirements have changed



Verification Addendum Form

New Verifications Forms being developed

In the meantime, any verification submitted should use the existing forms and attach a Verification Form Addendum (has been posted on [Remediation webpage](#))

The screenshot shows the top portion of a 'Verification Addendum Form' document. At the top left is the Connecticut Department of Energy and Environmental Protection logo. To its right is the department's name and address: 'Department of Energy and Environmental Protection, Bureau of Water Protection and Land Reuse, Remediation Division, 79 Elm St., Hartford, CT 06106-6127, www.ct.gov/deep/remediation'. Below this is the title 'Verification Addendum Form' and a 'Primary Remit:' field. A paragraph explains that amendments to the Remediation Standard Regulations and Environmental Use Restriction Regulations were adopted on February 16, 2021, and that the DEEP is revising the Verification Forms to include these new provisions. The document then lists 'Applicable RSRs' and asks the user to check either #1 or #2 below to indicate which version of the RSRs were used. Option #1 is for 2013 RSRs, and option #2 is for 2021 RSRs. Below this, there are sections for 'EUR:', 'Soil:', and 'Groundwater:', each with a list of checkboxes for various compliance options. At the bottom, there is an 'Other:' field with a text input box. The footer of the document includes 'VF_Addendum', 'Rev 03.16.21', and 'Page 1 of 1'.



Wave 2 Provision Questions

- ➔ EPOC will be a “clearing house” for any general question pertaining to specific question
- ➔ Question Form can be found at www.epoc.org/rsr-eur-questions
- ➔ Please submit questions before May 1st
- ➔ Remediation will have a Q & A session to answer some of these question (TBD)
- ➔ If a question is imperative for immediate action at a site, please reach out to the Remediation Project Manager or District Supervisor



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If we need further clarification, we
may take you off mute to speak

www.ct.gov/deep/remediationroundtable

REMEDIATION ROUNDTABLE – 3/23/2021

PFAS Action Plan Update

Speakers: Ray Frigon and Anna Hagstrom, CT DEEP Remediation Division



DEEP UPDATES

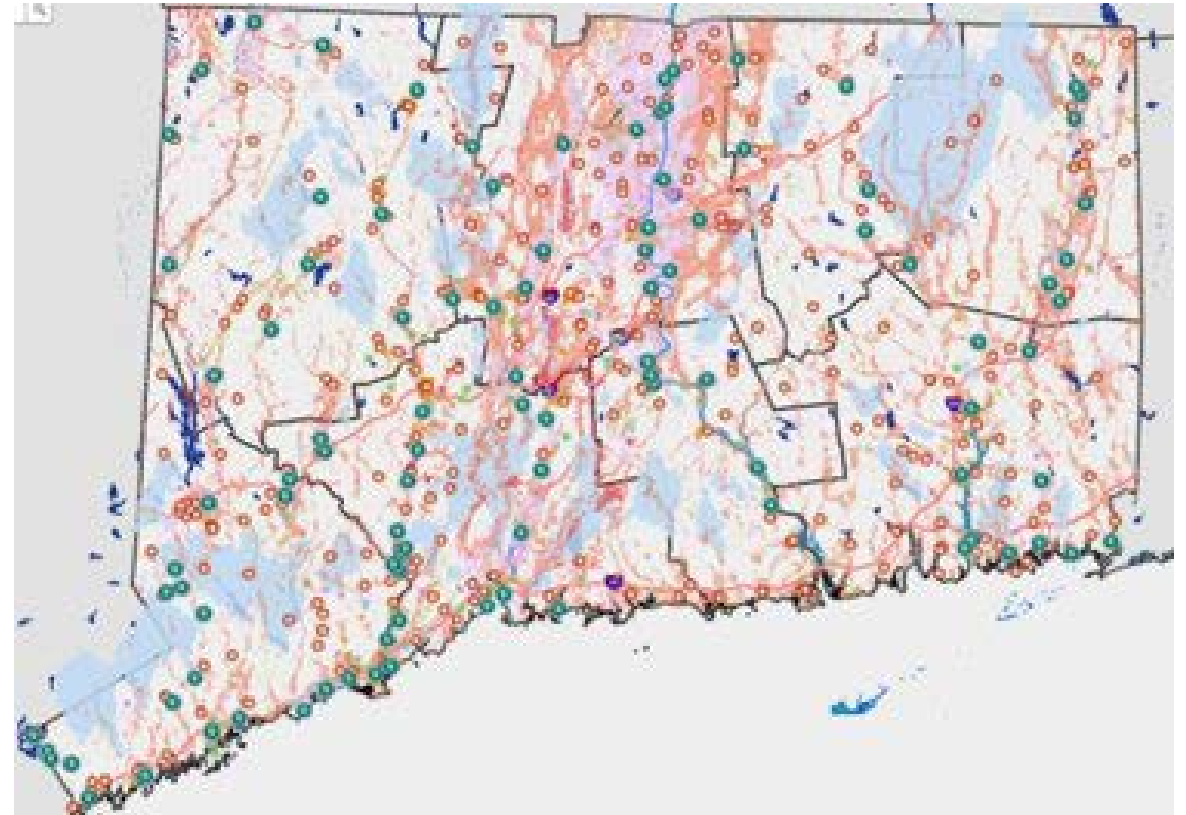
Projects with current in-house funding

■ GIS updates

- Identification of commercial operations and processes based on NAICS & SIC codes → approx. 1,000 industrial/commercial locations in CT
- Will inform future statewide sampling

■ POTW testing

- Approx. 1/3 of in-state POTWs
- Timeline: summer and winter 2021
- Influent, effluent, sludge, and scrubber water (for POTWs with incinerators)
- **RFP recently issued** (deadline: April 30th)



✓ BOND FUNDING FOR AFFF TAKE-BACK

\$2 Million Bond Authorization

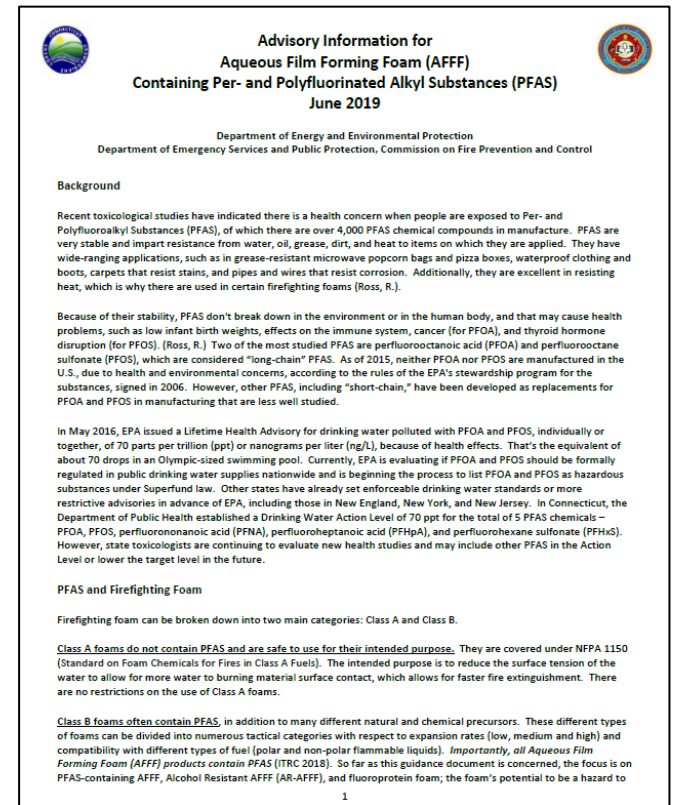
- **Take-back program** for municipal and state stocks of AFFF
- **Private well testing**, resources for residents with PFAS-contaminated wells
- Introduced in Governor's proposed FY 2021 budget
- **Authorized on July 21, 2020**



DEEP UPDATES

AFFF Take-Back Program (\$2M Bond Authorization)

- Purpose – **Collect and dispose of all AFFF stock** (est. 40,000 gallons) from state and municipal fire services
- Completed: **Laboratory testing of fluorine-free alternatives**
 - PFAS-free foam for regional foam trailers selected by DESPP with DEEP input – February 5, 2021
- Phases and **anticipated program schedule**
 - Container collection and storage/disposal: Spring-summer 2021
 - Decontamination pilot study: Spring-summer 2021
 - ✓ **RFP recently issued** (deadline: April 15th)
 - Remove AFFF from and decontaminate apparatus: Fall 2021
- **Challenges:** Decontamination, disposal/destruction methods



**Advisory Information for
Aqueous Film Forming Foam (AFFF)
Containing Per- and Polyfluorinated Alkyl Substances (PFAS)
June 2019**

Department of Energy and Environmental Protection
Department of Emergency Services and Public Protection, Commission on Fire Prevention and Control

Background

Recent toxicological studies have indicated there is a health concern when people are exposed to Per- and Polyfluoroalkyl Substances (PFAS), of which there are over 4,000 PFAS chemical compounds in manufacture. PFAS are very stable and impart resistance from water, oil, grease, dirt, and heat to items on which they are applied. They have wide-ranging applications, such as in grease-resistant microwave popcorn bags and pizza boxes, waterproof clothing and boots, carpets that resist stains, and pipes and wires that resist corrosion. Additionally, they are excellent in resisting heat, which is why there are used in certain firefighting foams (Ross, R.).

Because of their stability, PFAS don't break down in the environment or in the human body, and that may cause health problems, such as low infant birth weights, effects on the immune system, cancer (for PFOA), and thyroid hormone disruption (for PFOS). (Ross, R.). Two of the most studied PFAS are perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS), which are considered "long-chain" PFAS. As of 2015, neither PFOA nor PFOS are manufactured in the U.S., due to health and environmental concerns, according to the rules of the EPA's stewardship program for the substances, signed in 2006. However, other PFAS, including "short-chain," have been developed as replacements for PFOA and PFOS in manufacturing that are less well studied.

In May 2016, EPA issued a Lifetime Health Advisory for drinking water polluted with PFOA and PFOS, individually or together, of 70 parts per trillion (ppt) or nanograms per liter (ng/L), because of health effects. That's the equivalent of about 70 drops in an Olympic-sized swimming pool. Currently, EPA is evaluating if PFOA and PFOS should be formally regulated in public drinking water supplies nationwide and is beginning the process to list PFOA and PFOS as hazardous substances under Superfund law. Other states have already set enforceable drinking water standards or more restrictive advisories in advance of EPA, including those in New England, New York, and New Jersey. In Connecticut, the Department of Public Health established a Drinking Water Action Level of 70 ppt for the total of 5 PFAS chemicals – PFOA, PFOS, perfluorononanoic acid (PFNA), perfluoroheptanoic acid (PFHpA), and perfluorohexane sulfonate (PFHxS). However, state toxicologists are continuing to evaluate new health studies and may include other PFAS in the Action Level or lower the target level in the future.

PFAS and Firefighting Foam

Firefighting foam can be broken down into two main categories: Class A and Class B.

Class A foams do not contain PFAS and are safe to use for their intended purpose. They are covered under NFPA 1150 (Standard on Foam Chemicals for Fires in Class A Fuels). The intended purpose is to reduce the surface tension of the water to allow for more water to burning material surface contact, which allows for faster fire extinguishment. There are no restrictions on the use of Class A foams.

Class B foams often contain PFAS, in addition to many different natural and chemical precursors. These different types of foams can be divided into numerous tactical categories with respect to expansion rates (low, medium and high) and compatibility with different types of fuel (polar and non-polar flammable liquids). **Importantly, all Aqueous Film Forming Foam (AFFF) products contain PFAS** (TRC 2018). So far as this guidance document is concerned, the focus is on PFAS-containing AFFF, Alcohol Resistant AFFF (AR-AFFF), and fluoroprotein foam; the foam's potential to be a hazard to

1

[Link to Advisory Information](#)



DEEP UPDATES

Private well testing (\$2M Bond Authorization)

■ Initial testing

- Known AFFF deployment site in central CT
- Private wells potentially impacted by use of AFFF during emergency response
- Testing in response to incidents logged by DEEP ERU that pose a potential threat to nearby receptors

■ Future larger-scale testing

- To be informed by GIS evaluation



RECENT & ONGOING COLLABORATIONS

- Collaboration with **CT State colleagues** (DPH, DESPP, CT Agricultural Experiment Station)
- Networking with EPA and counterparts in **other states**
- Coordination with **local stakeholders**:
 - LEPs
 - Municipal officials
 - State legislators
 - Business and industry groups (CBIA, EBC)
 - Advocacy groups (CWA, CCE, watershed associations, environmental justice groups)
 - Public outreach initiatives
 - Research universities (UCONN, Yale)
 - Public outreach and research initiatives (see [recent paper](#) on YSPH PFAS symposium)

2021 LEGISLATIVE UPDATE

■ Three PFAS-related bills raised

1) Minimize use of **firefighting foam** containing PFAS (S.B. 837)

- Ban on AFFF use for training
- Ban on AFFF use for firefighting
- Take-back program for municipal AFFF

2) Ban in-state sale of **consumer packaging** containing PFAS (S.B. 926)

3) Test in-state sources of **bottled water** for PFAS (H.B. 6615)

- Annual testing by water bottlers
- DPH authority to prohibit use of sources with PFAS levels above DPH Action Level

■ 11 other PFAS-related bills proposed, select provisions include:

- Require DPH to plan drinking water testing and public education on PFAS in drinking water
- Ban use of PFAS in consumer products
- Establish state-funded AFFF replacement program
- Study use of biosolids for agriculture

NEXT STEPS FOR DEEP

✓ AMBIENT & SURFACE WATER PROTECTION CRITERIA

Remediation Standard	APS Criterion*
Residential Direct Exposure Criterion	1.35 mg/kg
Industrial/Commercial Direct Exposure Criterion	41 mg/kg
GA Pollutant Mobility Criterion	1.4 µg/kg
GB Pollutant Mobility Criterion	14 µg/kg
Groundwater Protection Criterion (Adopts DPH Drinking Water Action Level)	70 ng/L
Surface Water Protection Criterion	In Development

*Applies to \sum [PFOA, PFOS, PFHxS, PFNA, PFHpA]

✓ SUPPLEMENTAL BID FOR PFAS ANALYSIS

- To include additional matrices

✓ GUIDANCE ON ANALYSIS OF NON-DRINKING WATER MATRICES

- LC-MS/MS with isotope dilution
- Laboratory compliance with criteria in Table B-15 of the DoD Quality Systems Manual

QUESTIONS?

[DEEP PFAS Webpage](#)
[PFAS Task Force Webpage](#)
[CT PFAS Action Plan](#)

Contact Information:

Raymond.Frigon@ct.gov
Anna.Hagstrom@ct.gov





Remediation Roundtable Tips





Tip# 28: Electronic Document Submittals

Joanna Burnham
Environmental Analyst 3
Remediation Division



Important Shortcuts

The screenshot shows the website <https://portal.ct.gov/deep>. At the top, there is a red banner for COVID-19 information. Below that is a blue navigation bar with the CT.gov logo, the text "Connecticut's Official State Website", a search bar, and a "Language + Settings" button. The main header features a large image with the text "Connecticut Department of Energy and Environmental Protection". A yellow banner below the header contains a quote: "DEEP is continuing to carry out its mission and provide services while keeping both the public and our workforce safe during the COVID-19 pandemic. Click here for the latest updates on DEEP's response to COVID-19. [DEEP COVID-19 Response](#)".

The main content area includes a breadcrumb trail: "CT.gov Home / Department of Energy and Environmental Protection". On the left, there is a dark grey navigation menu with the following items:

- How Do I... >
- Energy >
- Environmental Quality >
- Natural Resources >
- Outdoor Recreation >
- Public Utilities Regulatory Authority (PURA) >
- Search Department of Energy and Environmental Protection

The search section includes a text input field with "by Keyword" and a search icon.

On the right, there is a "Most Popular" section with a list of links:

- What Is Open Outdoors >
- Parks & Forests >
- Boating & Paddling >
- Fishing >
- Hunting >
- DEEP Announces Precautionary Closures of Some Public Spaces >
- Online Services >
- Permits & Licenses >
- Public Notices >

A large blue arrow points to the "Online Services" link.



Connecticut

Department of Energy and Environmental Protection



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[CT.gov Home](#) / [Department of Energy and Environmental Protection](#) / [About Us](#) / [Online Services](#)

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by Keyword 🔍

DEEP Online Services

DEEP is continuing to expand its online business offerings!

Note: Many of our programs are now requesting electronic submittal of documents. Please verify directly with specific programs through [email](#) or through our program specific webpages concerning electronic submittal requirements.

Documents & Data

- Use the [new DEEP Document Online Search Portal](#) to view currently available agency documents
- [Video - Online Search Portal Demonstration](#) (Recorded October 2019 - Remediation Roundtable Meeting)
- Search or browse public data provided by Connecticut State Agencies using the [CT Open Data Portal](#)
- Many datasets concerning the [environment and natural resources](#) category can be found within the [CT Open Data Portal](#). These datasets can be searched, sorted, and tabulated.

Environmental Quality

- [Underground Storage Tank Notification](#)
- [EMIT](#)
- [NETDMR](#)
- [Radiation](#)
 - Diagnostic and Therapeutic X-Ray Registration (DTX)
 - Radioactive Material and Industrial X-Ray (RMI) Registration
- Stormwater Registrations ([Construction](#), [Industrial and No Exposure](#))
- Emergency Response Unit "Spill Case" Documents - [Instructions for electronic submittal](#) 📄
- Remediation Division and LUST Coordination Program - [Transmittal of Documents](#)



Energy

- [Electronic Filing for Energy Proceedings](#)

Public Utilities Regulatory Authority (PURA)

- [Electronic Filing for PURA](#)

Other





Emergency Response Unit is accepting documents through the Secure File Transfer Site

*please note you will need to obtain a different username and password to upload documents to ERSPD than you use for REM or LUST

Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

79 Elm Street • Hartford, CT 06106-5127 portal.ct.gov/deep Affirmative Action/Equal Opportunity Employer

**Instructions for Submitting Documents to the
Emergency Response and Spill Prevention Division
Emergency Response Unit**

- Documents related to oil and chemical spill incidents reported to CT DEEP's Emergency Response Unit should be sent by email to DEEP.SpillsDocs@ct.gov.
 - If you have documents too large to send by electronic mail you may submit documents to this secure file transfer website: <https://sft.ct.gov>. Please send an email to DEEP.SpillsDocs.upload@ct.gov to receive an upload user name and password.
- Documents submitted through email or the secure file transfer website can include all applicable correspondence, narrative reports, figures, tables, photos, and laboratory data provided they are [saved as a PDF/A](#) document.

Please name your document as follows:

COR_CASEID#

- For example,
 - If the Case ID# is 2016-09897, then you would name the document
COR_201609897
 - Please do not use a hyphen between the year and the unique case number.



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Department of Energy and Environmental Protection DOCUMENT ONLINE SEARCH PORTAL

- Home
- More Information and FAQs
- Questions on Searches and Documents
- Freedom of Information Act (FOIA) Requests
- Report Technical Difficulties

The DEEP Document Online Search Portal includes a collection of documents electronically produced or digitally scanned by the Agency. The portal is searchable by a variety of fields.

Note: At the current time, there are a limited number of documents available through the Search Portal. Please review [More Information and FAQs](#) for a list of the currently available Agency program documents, field definitions, and updates.

For the best experience use Chrome or Firefox.

Search Criteria

Agency Program ⓘ	<input type="text" value="Please Select Agency Program"/>	Entity Name ⓘ	<input type="text" value="Entity Name"/>
Town ⓘ	<input type="text" value="Please Select Town"/>	Street Address	<input type="text" value="Street Address"/>
Agency ID ⓘ	<input type="text" value="Agency ID"/>	Document Type ⓘ	<input type="text" value="Please Select Document Type"/>
File Type	<input type="text" value="Please Select File Type"/>	Subject(s) ⓘ	<input type="text" value="Subject(s)"/>
From Date	<input type="text" value="mm/dd/yyyy"/>	To Date	<input type="text" value="mm/dd/yyyy"/>

Reset Submit

Copy and Paste this address into your email to CC clients or other DEEP Staff without having to attach the document



Electronic Transmittal Form for DEEP Remediation and LUST Secure File Transfer (SFT)

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
REMEDATION DIVISION
LEAKING UNDERGROUND STORAGE TANK COORDINATION PROGRAM
www.ct.gov/deep

This Electronic Transmittal Form must be completed and included as the cover sheet of your electronic document when uploading a document to the Connecticut SFT website. Requirements for Transmittals through the SFT website:

- Only document types identified in the dropdown lists in Part III below may be submitted through the SFT website.
 - Documents submitted through the SFT website must include all applicable figures, tables and laboratory data.
 - Files must be formatted as PDF/A and use the appropriate naming convention:
 - For Remediation Filings: REM_RemID_DocumentType_DateofDocument
Example: REM_1234_MonitoringReport_01-01-2001
 - For LUST Filings: LUST_SiteAddress_Town_AbbreviationForDocumentType_DateofDocument
Example: LUST_1MainStreet_Hartford_ESA_01-01-2001
- Note: For "AbbreviationForDocumentType" use appropriate abbreviation at [Transmittal of Documents](#)

Part I: Primary Recipient: Remediation Program (* required)

For Remediation documents: Primary Program*: Property Transfer Rem ID*: 10458	For LUST documents: UST Facility ID: (if applicable) Spill Case Number: (if known)
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Part II: Site Information

Site Name*: Former Service Station No. 10748
 Site Address*: 21 Chamberlain Highway
 City/Town*: Kensington State: CT Zip Code: 06037

Secondary Programs (complete as many as applicable for this document):

Program:	Project ID:
Program:	Project ID:
Program:	Project ID:

Provide Project ID for each secondary program if it is known. Each program has a unique ID (i.e. Rem ID, Spill Case #, UST Facility ID, etc.)

Part III: Document Information (document type required for appropriate program[s] only)

Remediation*: Annual Report
 LUST*:
 Date of Document*: 3/2/2021 Version:

Part IV: Submitter Information

Name*: Matthew Berger
 E-mail*: matthew.berger@anteagroup.us
 Name of company/business this document is being submitted on behalf of: *
 Alliance Energy, LLC

Use this area for Additional Rem ID numbers

Rev 09-04-20



Questions or Comments?

Please type your Questions into CHAT

If we need further clarification, we
may take you off mute to speak

www.ct.gov/deep/remediationroundtable



Tip# 29: Submitting a Stewardship Permit Application

Veronica Tanguay
Environmental Analyst 2
Remediation Division



Stewardship Permit Application Tips

- The Remediation Division will now be issuing Stewardship Permits to Facilities that have:
 - Outstanding RCRA Corrective Action investigation or remediation; or
 - RCRA Closure or Post-Closure Care obligations; or
 - Sites with long-term care obligations (RCRA or Non-RCRA)

- **NOTE:** Solid Waste Landfills (Non-RCRA) will still be managed by Waste Engineering & Enforcement Division (WEED)



How to File an Application

- Application and instruction forms are being updated, stay tuned for updates!
- Submit paper copy of the Application, attachments, and fee payment to Central Processing Permit Unit (CPPU)
- Submit *electronic* copies of the Application and attachments to Remediation Division [Secure File Transfer Site](#) :
 - Instructions for online submittal found here: [Transmittal of Documents \(ct.gov\)](#)
 - Complete application in PDF/A format
 - Use Corrective Action REM ID for the Project on transmittal form, *when in doubt leave REM ID on transmittal form blank*

Attachment	Description	Tips
A	Executive Summary	
B	Applicant Background Information	
C	Applicant Compliance Information	
D	Coastal Consistency Review	
E	CT NDDB Information	
F	Conservation or Restriction Information	
G	Business Information	
H	Facility Plans (Site Maps)	
J	List of SWMUs / AOCs	
K	Closure Plan and Cost Estimate	Include all referenced plans within Plan
L	Post-Closure Plan and Cost Estimate	Include all referenced plans within Plan
M	Ground Water Monitoring Plan and Cost Estimate	Include all referenced plans within Plan
N	Site Characterization Plan and Cost Estimate	
O	Remedial Action Plan(s) and Cost Estimate	
P	Financial Assurance	
Q	Public Participation Plan	
R	Quality Assurance Project Plan	Only for RCRA facilities
S	Copy of ECAF form	
T	List of documents & dates to support Environmental Investigation	
U	Public Notice of Permit Application	

Required Attachments

- Everything listed may not be required for your site
- Consult the instructions for your specific case, **OR**
- Questions may be sent to: DEEP.REMStewardship@ct.gov



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Please type your Questions into CHAT

If we need further clarification we may
take you off mute to speak

www.ct.gov/deep/remediationroundtable



Staff Changes- Retirements



Rob Robinson



Tom O'Connor



Pete Hill



Baffour Kyei



Questions or Comments?

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www.ct.gov/deep/remediationroundtable



Remediation Roundtable

Next meeting: June 22, 2021