



REMEDIATION ROUNDTABLE

August 14, 2012



www.ct.gov/deep/remediationroundtable

AGENDA

Announcements:

- Background Guidance Survey Results
- Web Info

Updates:

- 95% UCL Workgroup
- New General Permits and TA Statute Change
- Remediation Transformation Details
- Petroleum Hydrocarbon Analysis



AGENDA

Short Presentations with Q&A:

- Audit Program: Process, Metrics, and Considerations
- Financial Assurance for RCRA
- Potable Water Overview



SURVEY: DETERMINING BACKGROUND

Questions designed to get your feedback on developing guidance for determining background conditions

- 143 people took survey!
- 34 pages of comments (on web)



HIGHLIGHTS:

- 76% RSR discussion of background insufficient
- 89% want guidance on naturally occurring soil
- 62% checklist in guidance would be useful

62% difficulty with background causes delays



Connecticut Department of Energy and Environmental Protection

CAMILLE FONTANELLA

WEB UPDATES

- **2 NEW** Technical Supporting Documents demonstrating how criteria for ETPH and EPH/VPH/APH analytical methods are calculated
http://www.ct.gov/dep/cwp/view.asp?a=2715&q=484634&depNav_GID=1626
also available through the RSR splash page
- **2 NEW** easy-to-use forms for requesting ETPH and EPH/VPH/APH analytical methods and criteria as APS
 - Easy to fill out, review and return – no letters necessary



UPDATE

95% UCL Workgroup Report Out

CARL GRUSZCZAK
ENVIRONMENTAL ANALYST II
REMEDIATION DIVISION



Connecticut Department of Energy and Environmental Protection

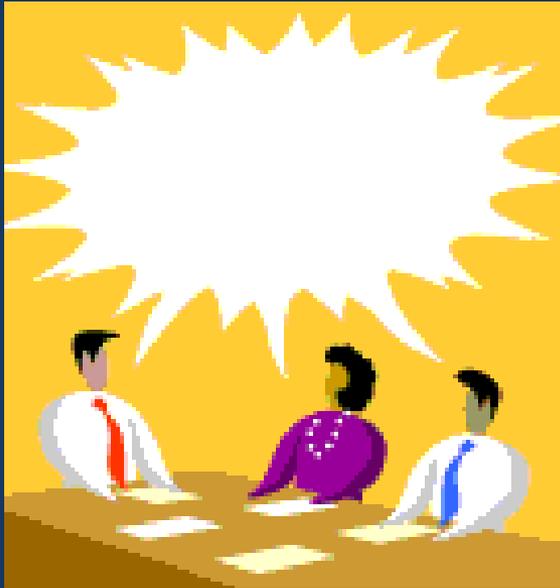
95% UCL GUIDANCE REVIEW

- Reviewed 95% UCL Guidance from other states (OH, PA, NJ, MI, FL, AL) and federal programs (RCRA, Superfund)
- Most state guidance recommended the use of ProUCL (free EPA Software)
- Most state guidance discussed use of a 95% UCL over an Exposure Unit rather than by Release Area
- * There is still a need for a CT-specific 95% UCL guidance to comply with RSR criteria.



POTENTIAL 95% UCL TOPICS

- Suggested method to calculate – ProUCL or justified equivalent method
- Data sets – Concept of Release Area and appropriate number of samples
- NDs – When and how to use
- Approaches for RSR variances (>2X, excavation, <20 samples)



95% UCL WORKGROUP

Questions / Comments

Please state your name and
speak loudly.

Submit comments to 95%UCL Workgroup at

DEP.remediationroundtable@ct.gov

www.ct.gov/deep/remediationroundtable



Connecticut Department of Energy and Environmental Protection

UPDATE

New General Permits Status and Temporary Authorization Statute Changes

KEN FEATHERS
SUPERVISING SANITARY ENGINEER
REMEDIATION DIVISION



Connecticut Department of Energy and Environmental Protection

GENERAL PERMITS

- Additional General Permits for in situ remediation discharges are in development
 - In-Situ Chemical Oxidation (ISCO)
 - Anaerobic Degradation (dechlorinization)
- General Permit Timeline
 - ISCO draft available on website soon
 - Seek pre-public-notice input on functionality
 - Same framework will be used for Anaerobic
 - Public notice end of October for both



ISCO GENERAL PERMIT

- Includes major oxidants
- Tiered authorization by DEEP
 - PWS / sensitive receptors nearby
 - Complexity
- Supports multi-phase implementation
- Selective self-implementation provisions
- Appended chemical specifications
- Zone of influence concepts are incorporated



TEMPORARY AUTHORIZATIONS

Statutory Changes

- Section 22a-6k of the Connecticut General Statutes amended by Public Act 12-148
 - Adds 22a-45a (Inland Wetlands and Watercourses) and 22a-349a (Stream Channel Encroachment)
 - Activity now permitted for 90 Days, whether consecutive or not
 - No renewals - No new TA will be issued within twelve calendar months of a previous TA (clarification)



TEMPORARY AUTHORIZATIONS

New concepts in TA usage allowed by statute:

- Multiple injection events are permissible
 - TA defines amount/scope for each
 - Notification of each event required
 - TA modification needed if amount or ZOI increase
- Limit of 90 days aggregate activity
 - Activity typically will be authorized to occur within one year
 - Flexibility if longer, but will not likely authorize many years



TEMPORARY AUTHORIZATIONS

Revised Application Form and Instructions

- Revised again to reflect PA 12-148 changes
- Web site updated – [List of Permits](#) page
- Old forms accepted until September 30, 2012
- Requires executive summary level recap of key supporting application documents
- Defines more clearly content expectations
- Identifies technical resources



TEMPORARY AUTHORIZATIONS

Revised TA Approval Format

- Statutory and other changes
- Explicitly authorized substances and amounts
- Increased reliance on application by reference
 - Work plan
 - Monitoring plan
- Zone of influence concept incorporated



Read
it!



GENERAL PERMITS AND TA

Questions / Comments

Please state your name and
speak loudly.

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Connecticut Department of Energy and Environmental Protection

UPDATE

Comprehensive Evaluation and Transformation: Details and Schedule

GRAHAM STEVENS

OFFICE DIRECTOR

CONSTITUENT AFFAIRS AND LAND MANAGEMENT



Connecticut Department of Energy and Environmental Protection

CLEANUP TRANSFORMATION

- Public Act No. 12-196 requires DEEP to submit a report to the Governor and Legislature by January 1, 2013
- Report will address statutory and regulatory changes and/or new frameworks



CURRENT DEEP ACTION

- DEEP working internally to further develop and refine concepts
 - In particular how will release reporting and cleanup be integrated
- DEEP continues to seek input from related State Agencies - AG's Office, DPH, DECD, Insurance and Banking



REMAINING STEPS – PROGRAM OUTLINE

- DEEP to complete a Program Outline with input from the Remediation Division, Emergency Response and Spill Prevention Division and AG's Office
- DEEP to publish the Program Outline for stakeholder feedback
 - Anticipated in early September



PROGRAM OUTLINE – OUTREACH

- DEEP will host a public meeting to present and receive verbal feedback on the Program Outline
- Public comments are always welcome through DEP.Cleanup.Transform@ct.gov



REMAINING STEPS – DRAFT FRAMEWORK

- DEEP to release draft proposal for new and revised statutory and regulatory framework
 - Anticipated in late September
- Draft Framework will be based on process to date with special attention on stakeholder feedback on Program Outline



DRAFT FRAMEWORK – OUTREACH

- DEEP will host a public meeting to present and receive verbal feedback on the Draft Framework
- Public comments are always welcome through DEP.Cleanup.Transform@ct.gov
- DEEP will solicit volunteers for multiple stakeholder workgroups to develop feedback on the Draft Framework
 - Anticipated selection in mid-October



DRAFT FRAMEWORK - WORKGROUPS

- Workgroups will have a specific charge
- DEEP staff will be members of workgroups but workgroups are *independent* of DEEP
- Workgroups will be selected to balance representation by different stakeholder groups
- Preference will be given to those not previously selected for a workgroup



DRAFT FRAMEWORK - WORKGROUPS

- Workgroups will issue a report to DEEP with specific comments and recommendations on the Draft Framework
 - Anticipated to be due in mid-November
- Public comments are always welcome through DEP.Cleanup.Transform@ct.gov



REMAINING STEPS – DEEP REPORT

- Pursuant to Public Act No. 12-196 – DEEP to submit a report to the Governor and Legislature by January 1, 2013
- Report will address statutory and regulatory changes and/or new frameworks
- All public comments – regardless of the form – will be considered



DEEP REPORT – OUTREACH

- DEEP will host a public meeting to present and receive verbal feedback on the DEEP Report
 - Meeting will be held in advance of the Legislative hearing on any proposed Bill
- Public comments are always welcome through DEP.Cleanup.Transform@ct.gov



NEXT STEPS AND TENTATIVE DATES:

- **Program Outline** – Early September
- Public meeting on Program Outline to follow
- **Draft Framework Report** – Late September
- Public meeting on Details Document to follow
- **Framework Workgroups** – Selection Mid-October
– Reports due to DEEP – Late November
- **DEEP Report to Gov and Legislature** – January 1st
- Public meeting on Report prior to Hearing





Public comments are always welcome through
DEP.Cleanup.Transform@ct.gov



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GRAHAM STEVENS

REMEDIATION TRANSFORMATION

Questions / Comments

Please state your name and
speak loudly.

Submit comments to

DEP.Cleanup.Transform@ct.gov

www.ct.gov/deep/remediationroundtable



UPDATE

Information on Petroleum Hydrocarbon Analysis



PETER HILL
SUPERVISING ENVIRONMENTAL ANALYST
REMEDIATION DIVISION



Connecticut Department of Energy and Environmental Protection

PETROLEUM WEBPAGE UPDATED

➤ “Analytical Methods Used to Characterize Petroleum Releases”

http://www.ct.gov/dep/cwp/view.asp?a=2715&q=324956&depNav_GID=1626



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PETER HILL

Revisions to the Webpage:

- Included information on the Reporting Limit for the ETPH method:
 - ✓ Reporting Limit of 100 ug/l to 250 ug/l is acceptable for aqueous samples
- Editorial revisions to text



PETROLEUM HYDROCARBON ANALYSIS

Revisions to the Table of Suggested Analytical Methods

Suggested Analytical Methods for Evaluation of Petroleum Releases		
Petroleum Product Released	Analytical Methods for Release Characterization	Comments
Gasoline	8260 or VPH (carbon ranges and target compounds) or VPH (carbon ranges only) and 8260	Consider analysis for the following oxygenates/additives on a site-specific basis, based on the conceptual site model: ethanol, tert-butyl alcohol, ethyl-tert-butyl-ether, tert-amyl methyl ether, and diisopropyl ether, lead and other fuel additives such as Ethylene Dibromide (EDB). If the spill is potentially impacting a water supply or is in a GA/GAA area, conduct analysis for volatile organic compounds (VOCs) using EPA Method 524.2/3 or low-level RCP Method 8260.
Light Petroleum Solvents (naphtha, Stoddard Solvent, mineral spirits, paint thinner, etc.)	ETPH and 8260 or VPH (carbon ranges and target compounds)	If the spill is potentially impacting a water supply or is in a GA/GAA area, conduct analysis for VOCs using EPA Method 524.2/3 or low-level RCP Method 8260.
#2 Fuel Oil and Diesel	ETPH, 8260 and 8270 or EPH and VPH (carbon ranges and target compounds for each method)	If the spill is potentially impacting a water supply or is in a GA/GAA area, conduct analysis VOCs using EPA Method 524.2/3 or low-level RCP Method 8260. It may be appropriate to analyze a



Revisions to the Table of Suggested Analytical Methods:

- ✓ Listed analytical methods in one column to indicate there was no preference for one analytical suite over another
- ✓ Footnotes were incorporated into the table



PETROLEUM HYDROCARBON ANALYSIS

Revisions to the Table of Suggested Analytical Methods:

➤ Gasoline

- ✓ Added EDB to list of additives



Revisions to the Table of Suggested Analytical Methods:

➤ #2 Fuel Oil, Diesel, Kerosene

- ✓ Added Kerosene to the products column – more similar to #2 oil than #3 - #6 fuel oils
- ✓ Added 8260 and VPH to the analytical suite – these products may have volatile components



Revisions to the Table of Suggested Analytical Methods:

- Waste Oils and Unknown Petroleum Substances
 - ✓ Combined waste oil and unknown petroleum substance categories – simplified table



Revisions to the Table of Suggested Analytical Methods:

➤ Waste Oils and Unknown Petroleum Substances

- ✓ Addition of VPH – these products may have volatile components



Revisions to the Table of Suggested Analytical Methods:

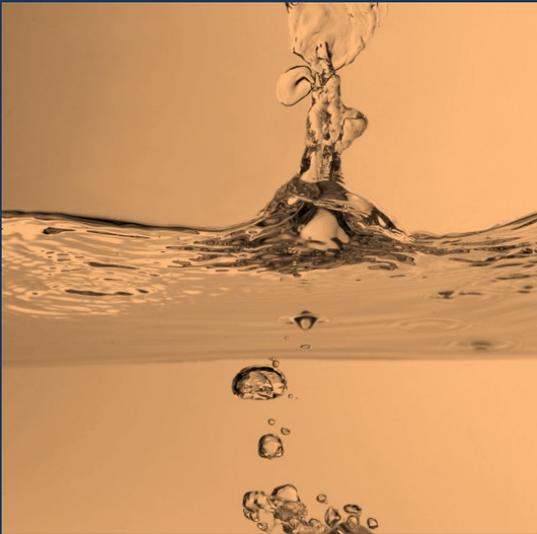
➤ Waste Oils and Unknown Petroleum Substances

- ✓ Changed “heavy metals” to “metals” selected on a site-specific basis – included flexibility to allow the environmental professional to select metals based on the conceptual site model



PETROLEUM HYDROCARBON ANALYSIS

Revisions to the Table of Suggested Analytical Methods:



- Mineral Oils and Dielectric Fluids
- ✓ New category not included in table



Questions / Comments

Please state your name and
speak loudly.

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Audit Program: Process, Metrics, and Considerations

ROBERT ROBINSON
SUPERVISING ENVIRONMENTAL ANALYST
REMEDIATION DIVISION



Connecticut Department of Energy and Environmental Protection

AUDIT PROGRAM

PURPOSE

- Quality control of LEP Program
- Ensure public confidence

GOAL

- Adequate understanding of environmental conditions
- Proper application of and compliance with RSRs



VERIFICATION PROCESSING - RECAP

All Verifications go through Administrative Review for completeness



Some verifications are filed with no additional review (No-Audit Letter issued)

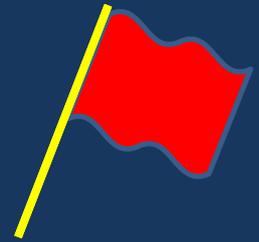


Some are screened more thoroughly for technical merit or RSR application



TECHNICAL SCREENING FOR RED FLAGS

- A **Red Flag** is an apparent significant data gap
- A data gap is considered significant if:
 - filling such a data gap may alter the LEP's decision-making process or final opinion
 - the data does not/cannot support the CSM
 - more than 1 CSM can be supported by the existing data set



TECHNICAL SCREENING

Screening is based on VRGD

- ✓ Is a sufficient level of detail provided?
- ✓ Was the investigation of the site conducted in accordance with the SCGD?
 - Or if an alternative industry standard was used, was it adequately documented and were the goals of the SCGD adequately met?
- ✓ Were all AOCs associated with the type of establishment identified and evaluated?

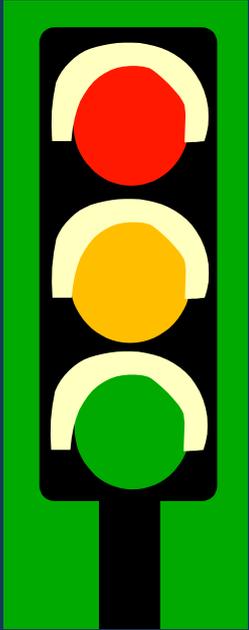


TECHNICAL SCREENING

- ✓ Do the identified COCs make sense for the establishment?
- ✓ Does it appear the LEP had a 3-dimensional understanding of any and all releases before rendering conclusions?
- ✓ Is the groundwater monitoring data sufficient to support the CSM?
- ✓ Does the Final CSM make sense? Do the findings make sense and support the CSM?



COMPLIANCE SCREENING



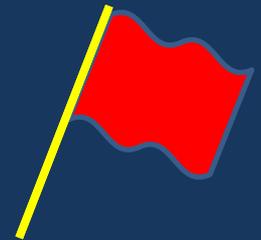
- ✓ Did the LEP discuss all means / methods used to demonstrate compliance with the RSRs?
- ✓ Is compliance data presented in context of applicable RSR provisions?
- ✓ Was data usability demonstrated?



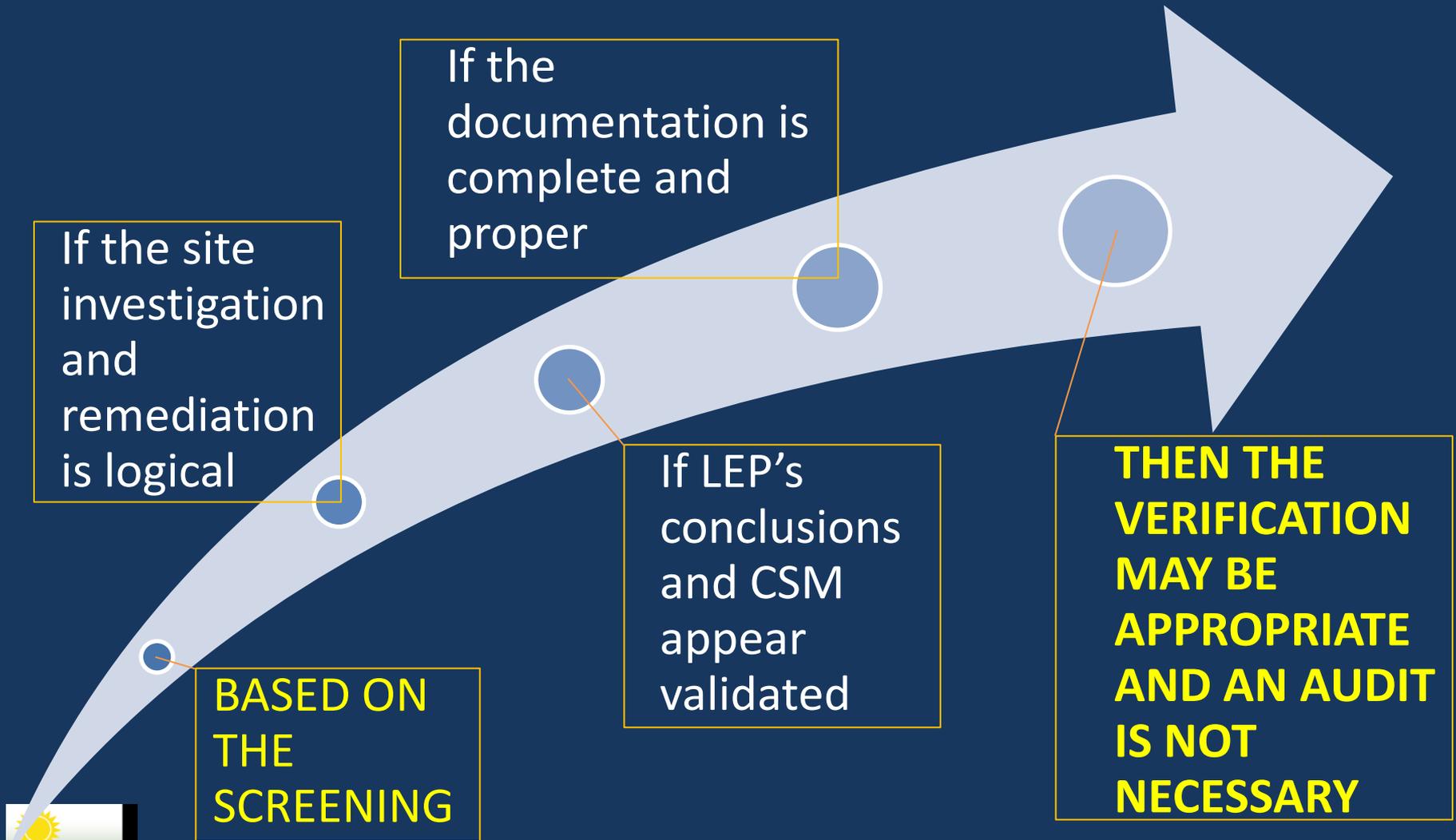
POST-SCREENING

LEP may be contacted for clarification of a particular point, data set, or application of RSR provisions:

- Supplemental documentation may be warranted to document LEP's clarification via a formal written document or by email correspondence
- If LEP cannot provide sufficient clarification of an issue, this may be considered a **Red Flag**



AUDIT SELECTION



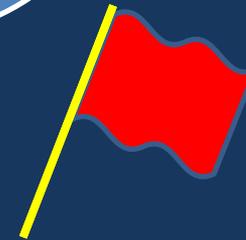
AUDIT SELECTION

If the screening identifies:

Violations of statutes /regulations

Incomplete Verification Report

Red Flags



Staff discusses apparent issues with Supervisor or APC
(Audit Program Coordinator)



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AUDIT SELECTION

- If staff must review the Department's file to obtain an appropriate understanding of the LEP's CSM or to locate and otherwise obtain information to support the LEP's opinions...

an Audit Recommendation Memo will be processed.



AUDIT SELECTION

If supervisory concurrence with red flags, staff drafts Audit Recommendation Memo with Verification Report Screening - Audit Recommendation Checklist and Notice of Audit

**District Supervisor and APC review
Audit Recommendation**

Notice of Audit issued with inclusion of Audit Recommendation Memo



AUDIT RECOMMENDATION MEMO

➤ Presents summary of **Red Flags**

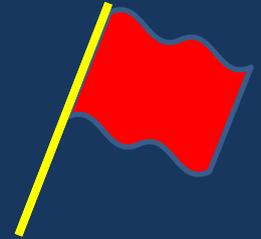
✓ Documentation omissions

- Approvals
- Receptor surveys
- Tables and figures

✓ Apparent Phase I, II, III data gaps

✓ Apparent groundwater data gaps

✓ Apparent application issues with Demonstration of Compliance



AUDIT PROCESS

1. Audit Meeting

- Additional info may be presented
- Discuss apparent data gaps identified by DEEP
- Discuss validated CSM
 - relevant findings
 - thought processes
 - sampling rationale
- Discuss application of RSRs
- Open to all stakeholders



AUDIT PROCESS

2. Supplemental Information

- May be applicable/acceptable
- Confirmation sampling of specific issue, if questionable
- No additional investigation of AOCs accepted that were not originally included in site characterization



AUDIT PROCESS

3. Technical Review

- Further technical review of information presented and discussed during audit process

4. Audit Report

- Details process and any outstanding issues

5. Audit Findings

- Formal letter
- Details Statutory requirements, if any
- Audit Report attached



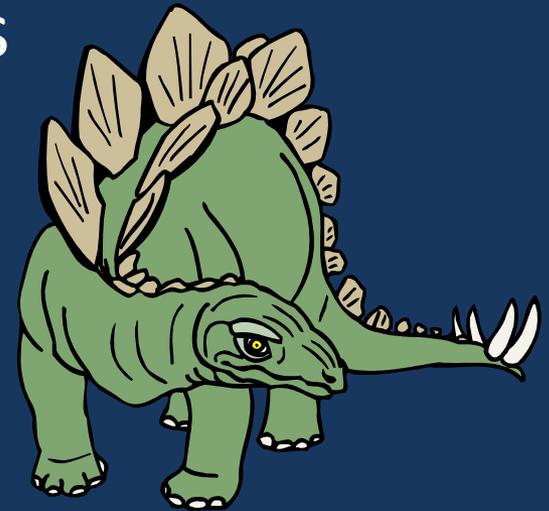
DEEP DECISION-MAKING

➤ Audit Response Document

- ✓ Accepted
- ✓ Rejected

➤ Combined 70+ years of experience imbedded in DEEP response to verifications

- ✓ Staff
- ✓ APC
- ✓ District Supervisor
- ✓ Assistant Director

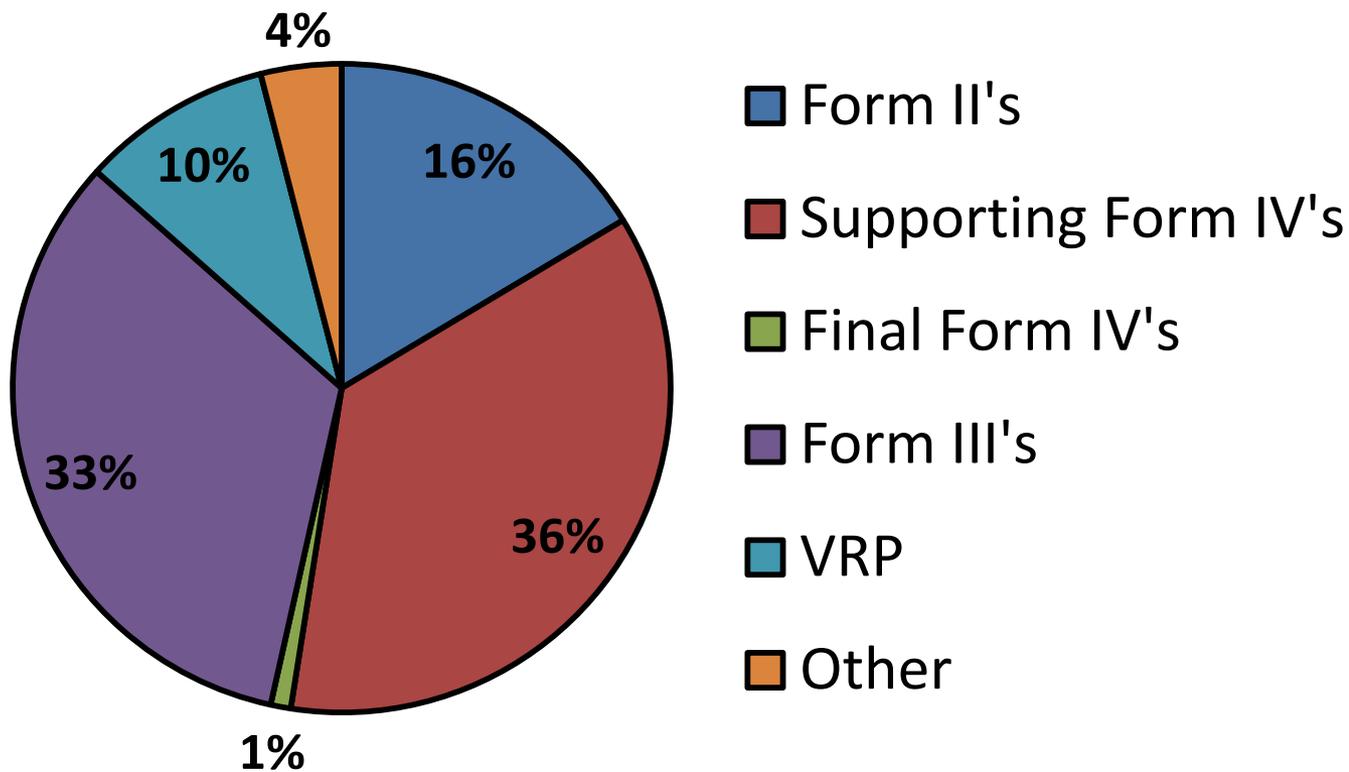


AUDIT PROGRAM METRICS

as of 12/31/11

613 Verifications submitted

202 Verifications Selected for Audit (33%)

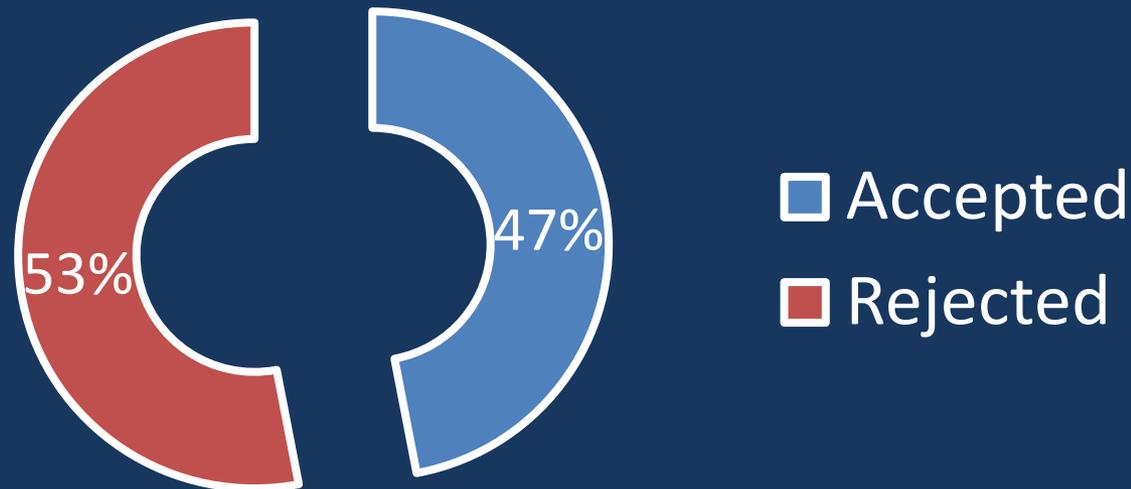


AUDIT PROGRAM METRICS

as of 12/31/11

Of the verifications selected for audit, where audit process completed, fairly even split on resolution:

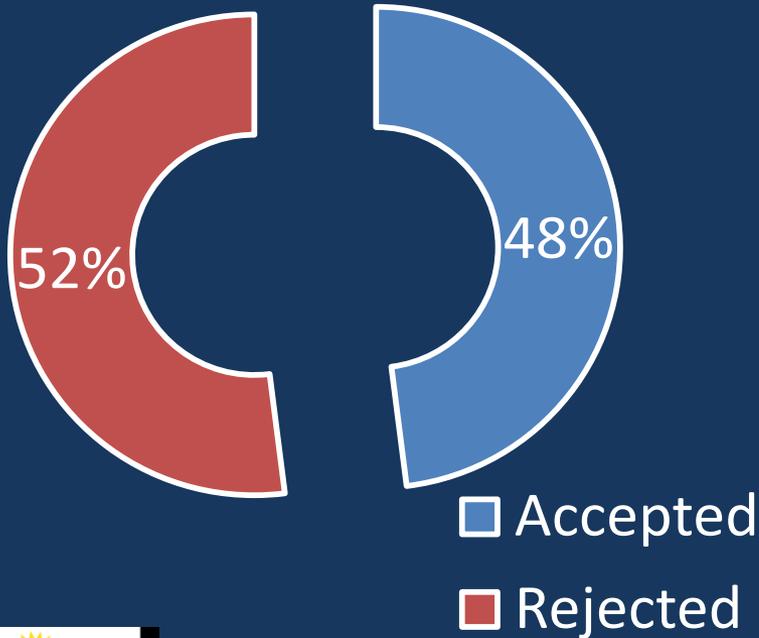
Audit Resolution



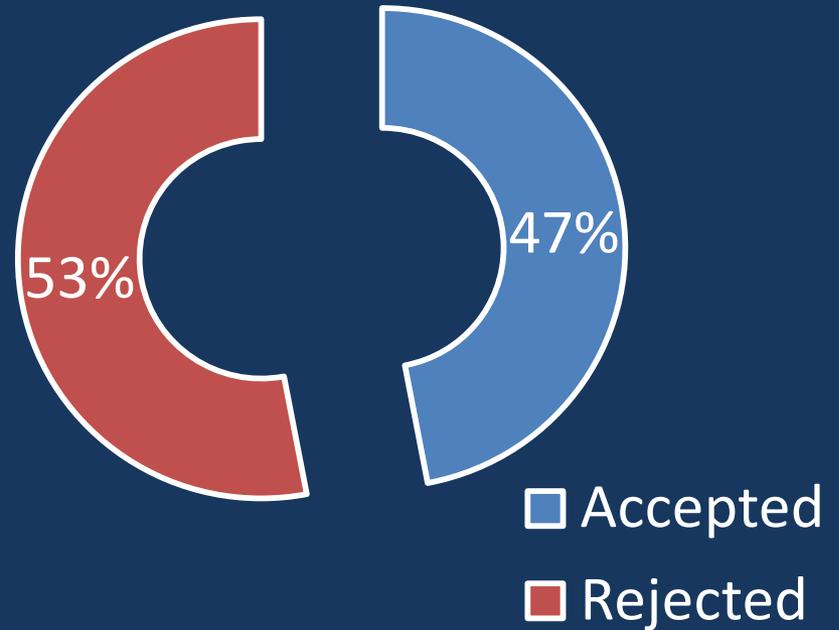
AUDIT PROGRAM METRICS

as of 12/31/11

Form II 31 Audits Completed



Form III 60 Audits Completed



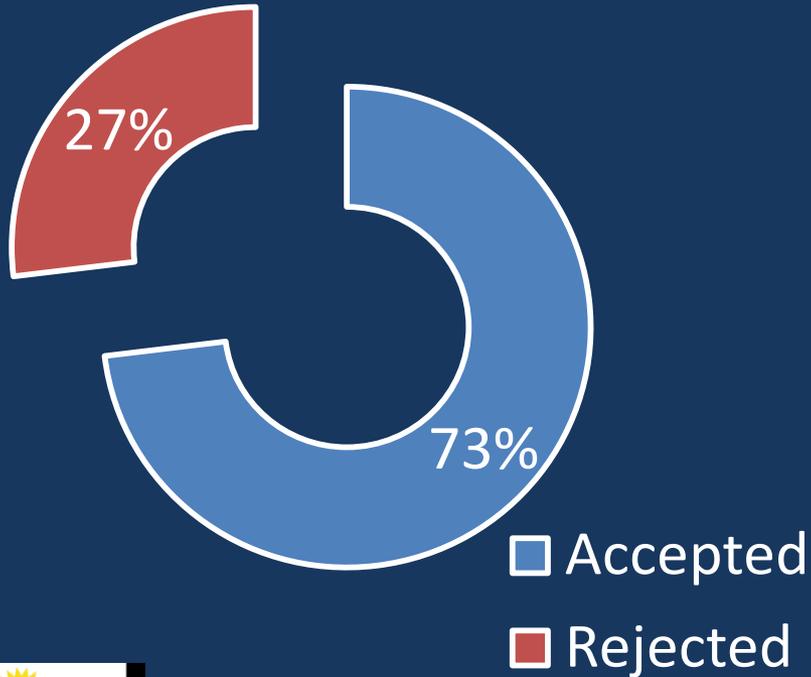
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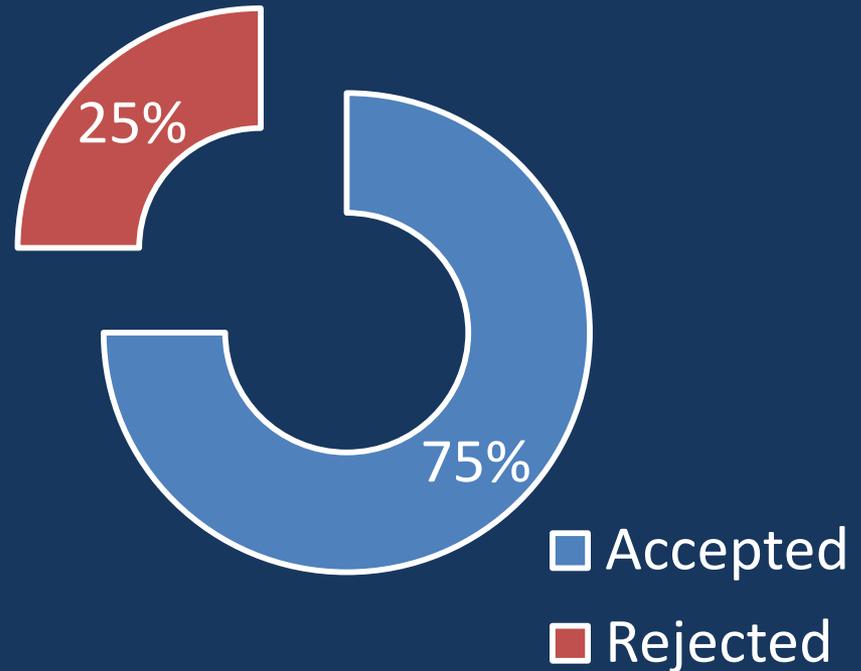
AUDIT PROGRAM METRICS

as of 12/31/11

Supporting Form IV 52 Audits Completed



Final Form IV 4 Audits Completed



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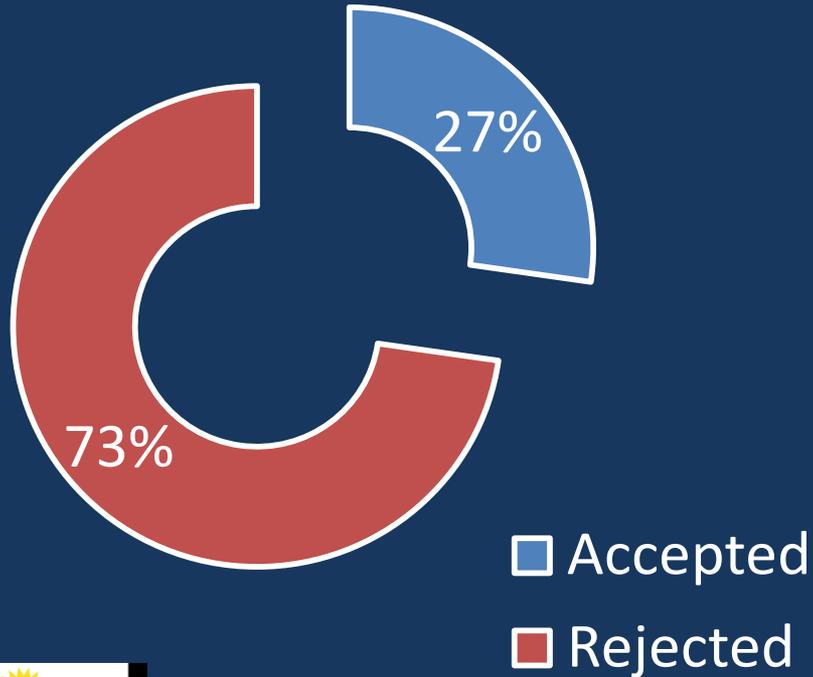
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AUDIT PROGRAM METRICS

as of 12/31/11

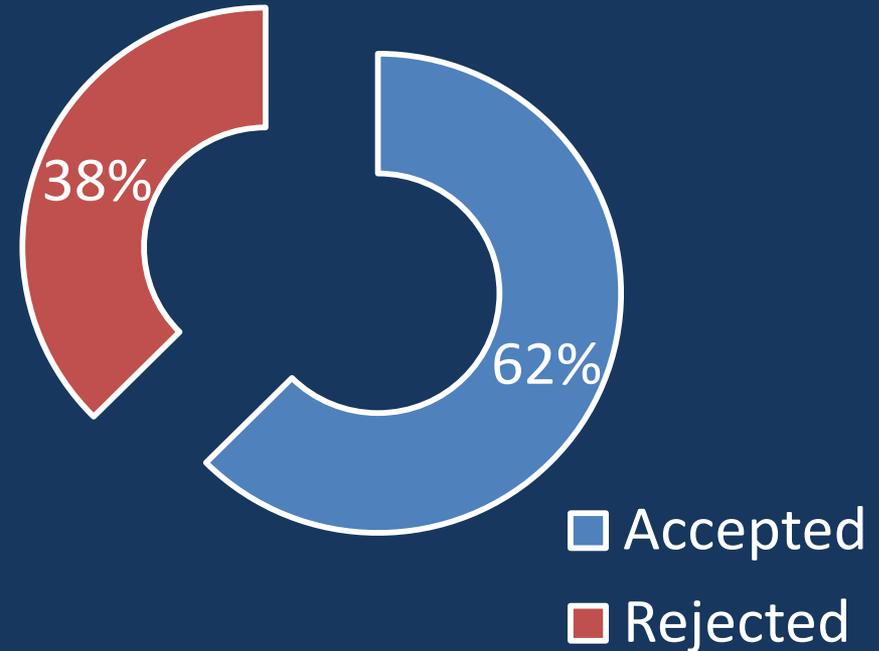
133x

11 Audits Completed



133y

8 Audits Completed



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CONSIDERATIONS

➤ Selection for audit

60 % Form II -- 51% Form IV -- 44% VRP

- It appears that a verification coming in with no prior knowledge by or involvement with DEEP has a significantly higher chance for a technical screening and to be selected for audit



CONSIDERATIONS

➤ Audit Issues and Deficiencies

- Track issues in characterization and application of RSRs
- ✓ Characterization: good generic breakdown



COMMON SCGD ISSUES

- Documentation
 - CSM not validated → 49%
 - VR lacking in detail → 24%
- Phase I
 - All AOCs not identified (not evaluated) → 47%
 - Description of operations, storage, handling, and disposal → 18%



COMMON SCGD ISSUES

- Phase II
 - AOCs not evaluated → 31%
 - Conclusions related to “No-Release”
 - Insufficient data to support → 36%
 - GW used as only line of evidence and locations of data points not representative of PRA → 18%
 - Lack of appropriate COCs in sampling → 11%
 - Black Box syndrome → 4%



COMMON SCGD ISSUES

- Phase III (related to LEP's understanding of releases)
 - Understanding of site hydrology → 42%
 - 3D dimensions of plume unknown → 40%
 - Phase III not conducted → 16%
 - Source of release not determined → 15%
 - Sampling rationale not provided or considered → 11%
 - Understanding of seasonal variations of COC concentrations and distribution → 9%



COMMON RSR ISSUES

RSRs - focus on compliance

➤ Categorical analysis

- Quality of data
 - COCs – appropriate analyses not conducted
 - Usability – not representative
- Quantity of data – not enough sampling



COMMON RSR ISSUES

Type of Issue	% of all Rejected Verifications	Sampling* (% with this issue)	Analysis^ (% with this issue)
DEC	51	60	40
PMC	53	75	25
GWPC	76	88	12
SWPC	20	89	11
VoIC	4	100	0
Background GW	20	100	0

*Sampling Issues = not enough or not representative

^Analysis Issues = not the right COCs



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SUMMARY

- Issues and deficiencies provide information for developing future guidance and training
- 47% of verifications selected for audit are determined to be appropriate
 - Documentation issues with original submittal
 - CSM Clarification
 - Thought processes
 - Sampling rationale
 - Etc.
- Overall, 85% of all verifications are in good standing



AUDIT PROGRAM

Questions / Comments

Please state your name and
speak loudly.

www.ct.gov/deep/remediationroundtable



Financial Assurance

Part 1: RCRA

MARK LATHAM

ENVIRONMENTAL ANALYST 3

WASTE ENGINEERING & ENFORCEMENT DIVISION

PROGRAM ANALYSIS GROUP

(860) 418-5930



FINANCIAL ASSURANCE

Why is Financial Assurance Required?



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FINANCIAL ASSURANCE

...Financial responsibility protects public health and the environment by promoting the proper and safe handling of hazardous materials and protecting against a liable party defaulting on closure or clean up obligations...Absent financial assurance, protection of human health and the environment would depend on available governmental financial resources causing a shift in costs from the responsible parties to the state and federal taxpayers¹.



¹Exerpts taken from EPA's National Program Managers' Guidance Section II. National Priorities for Enforcement and Compliance Assurance.



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RCRA FINANCIAL ASSURANCE

In short:



Financial assurance (FA) ensures that certain facilities and properties will **have sufficient funds to pay for cleanup, closure or post-closure care, 3rd party liability, construction activities or other obligations**



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RCRA FINANCIAL ASSURANCE

RCRA Financial Assurance Regulations:

40 Code of Federal Regulations (CFR)

Parts 264/265, Subpart H - Financial Requirements

Part 264.101 – Corrective Action Responsibility

Part 270 – Changes in Ownership / Oper. Control

Regulations of Connecticut State Agencies (RCSA)

RCRA – §§ 22a-449(c)-100, 104 & 105, 110

Solid Waste Regulations – 22a-209-4(i)



OTHER FINANCIAL ASSURANCE

- Remediation Standard Regulations (RSRs)
 - Variances for Engineered Control (EC) O&M
- Property Transfer Program
 - “Establishments” require FA for condo exemption
- CERCLA, RCRA and UST 3rd Party Liability Coverage
- MOU for construction/O&M activities



FINANCIAL ASSURANCE

What do you need to do?



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FINANCIAL ASSURANCE

- Determine Cost Estimates (C-E)
 - Basis for value of FA instrument
 - Guidance found in regulations / EPA website
 - Get multiple quotes for revised C-E
 - Update annually with new costs or use inflation factor*
- Work with financial institution to establish Instruments / Mechanisms
- Seek approval / concurrence from DEEP



*Resources: [CT DEEP's Website](#), www.rsmeans.com and [U.S. Department of Commerce Bureau of Economic Analysis' Website](#) for annual IPD / inflation factors for GNP



Acceptable HW, SW & CA

Instrument Formats

- Based on RCRA Subpart H instruments:
 - Trust Fund (Funded or Standby)
 - Irrevocable Standby Letter of Credit (“LOC”)
 - Surety Bond (Payment or Performance)
 - Insurance
 - Financial Test (self insurance)
 - Corporate Guarantee, if applicable
- Bonds & LOCs require a standby trust agreement
- See RCRA formats posted on DEEP Website
<http://www.ct.gov/dep/financialassurance>





Financial Assurance Instruments (cont'd)



- Legal documents issued by financial institutions recognized by federal gov't or state agency (e.g., FDIC, Federal Reserve, Circular 570, CT Department of Banking or Insurance, etc.)
- Must be “evergreen” and “irrevocable”
- Instrument language must be verbatim per CT HW Mgmt Regs. as incorporated by reference
- FA provisions are intended to have no lapse in coverage for any length of time



FINANCIAL ASSURANCE

How do you do this?



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MARK LATHAM

WEED FA PROCEDURES

1. Fill out template FA instrument formats

Available on DEEP Website: www.ct.gov/dep/financialassurance

2. Take to Bank / Insurer / Surety

3. Email drafts to DEEP staff for quick review prior to official submission

4. Submit originally-signed duplicates for your file to be stored by DEEP

-May need to submit annual adjustments for inflation

5. Check & Double Check Language of Instrument

-Must be exactly as prescribed or it will be denied/non-compliant



FINANCIAL ASSURANCE

Changing FA Instruments / Minimize overlap in coverage

- Notify DEEP to begin transaction process
- (Optional) Seek from DEEP: template transaction letter (e.g., terminating LOC & STA for newly Funded Trust)
- Email to DEEP for review / concurrence: new FA instrument and optional draft transaction letter
- Ensure signed instruments are worded properly
- Submit to DEEP for concurrence



FINANCIAL ASSURANCE

Canceling an Instrument:

- Taken very seriously – clock begins with Notice
- Owner/Operator to establish another acceptable “alternate” FA instrument
- Seek CT DEEP’s approval within 90 days of cancellation notice
 - Failure to do so may lead to an enforcement action or executing the right to draw on the instrument being canceled



FINANCIAL ASSURANCE

Additional Resources

WEED Hotline – 888-424-4193

HW & SW Permitting – 860-424-3372

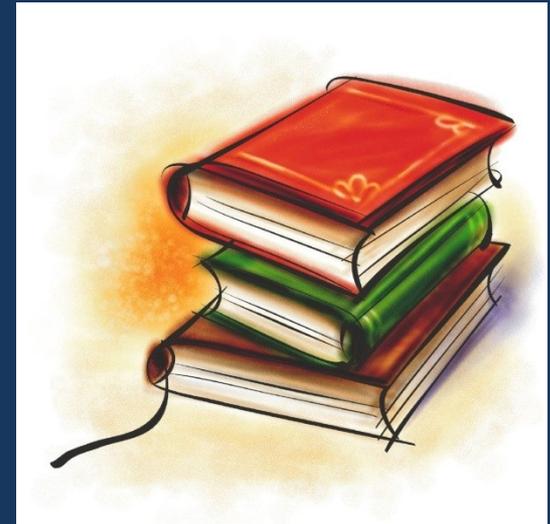
Mark Latham – 860-418-5930

David Ringquist – 860-424-3573

[RCRA Corrective Action Links](#)

[RCRA Cost Estimate Adjustments](#)

[HW & SW FA Instrument Formats](#)



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MARK LATHAM

FINANCIAL ASSURANCE

Questions / Comments

Please state your name and
speak loudly.

www.ct.gov/deep/remediationroundtable

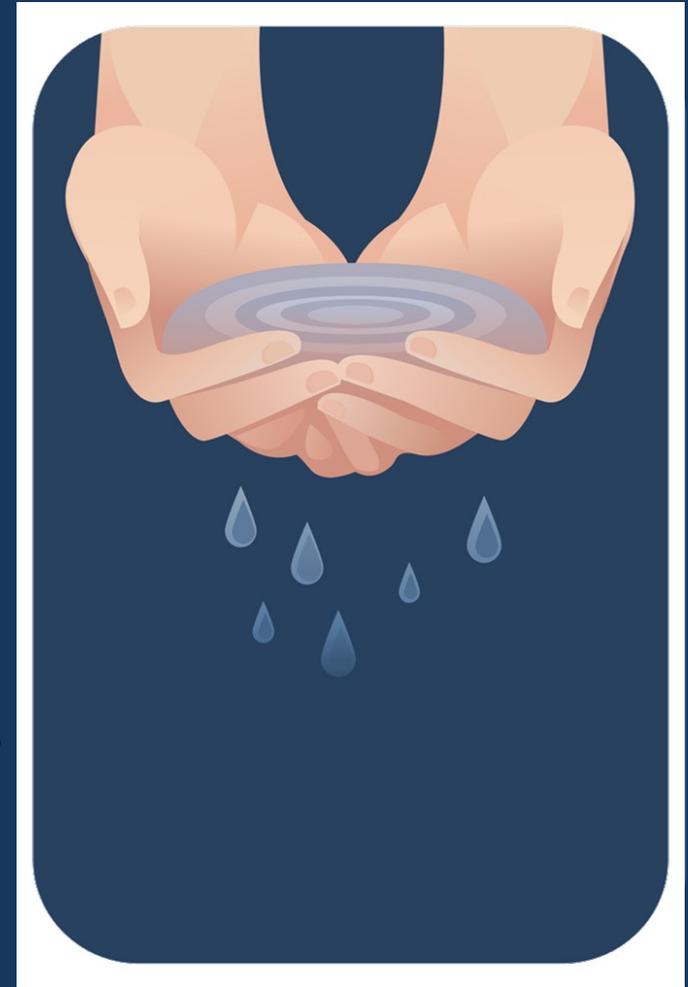


Connecticut Department of Energy and Environmental Protection

MARK LATHAM

Potable Water Program Overview

BILL WARZECHA
SUPERVISING ENVIRONMENTAL ANALYST
REMEDIATION DIVISION



POTABLE WATER PROGRAM



- Sec. 22a-471 of the CGS - private and public drinking water wells
 - Regulatory Authority
- Law protects human health and ensures safety of drinking water from man-made pollutants
 - Not naturally-occurring
- Identify RP



DRINKING WATER CRITERIA

- Maximum Contaminant Levels (federal)
- Drinking Water Action Levels (state)
 - Action Levels are established by DPH
 - If no Action Level, one can be established
 - Action Level may be different than MCL or GWPC
 - Proposed changes to Action Levels
- Groundwater Protection Criteria (RSRs)



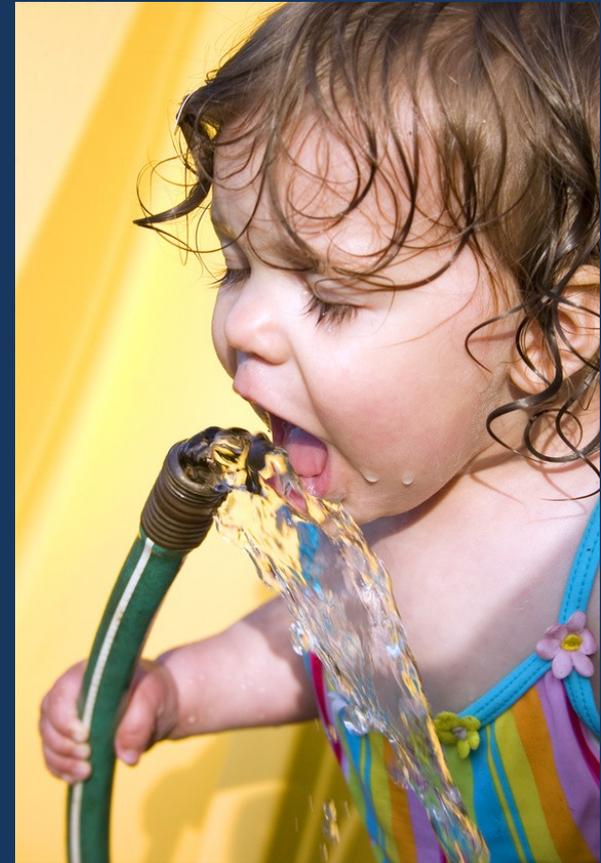
CONTAMINATED DRINKING WATER

- AL exceedance – Rem. Div. provides short-term supply of drinking water until RP ID'd
- RP responsible for:
 - Causing or creating pollution (not always property owner)
 - Taking over ST and LT supply of drinking water
 - Determining extent and degree of pollution
 - Producing an engineering report for long-term options (most cost effective)
 - Implementing selected option



DEEP INVOLVEMENT

- If no RP, municipality can apply for a potable water grant for the LT supply for all affected properties
- Water Supply Consent Order - water supply alternatives must be consistent with Regs
- Municipality can apply for grant to cover monitoring, engineering study, cost of public water line, 5 years of M&M for filter systems



OVERLAP WITH SEH PROGRAM

- 22a-6u = Public & private wells - notification required when GWPC exceeded or pollution detected at any level
- Well Receptor Survey to make sure all potential at-risk properties tested
- DEEP may have property owner initially supply ST water to abate hazard pathway
 - May be followed up by transition to RP or State



POTABLE WATER LEAN

- Streamlining internal procedures to help us do our business better
 - Sampling
 - Coordinating with lab
 - Forms
- Guidance on 471 triggers and what is required
- Guidance on what is naturally occurring and what is not



POTABLE WATER PROGRAM

Questions / Comments

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REMEDIATION ROUNDTABLE

GENERAL Q&A



E-mail: DEP.remediationroundtable@ct.gov

Web: www.ct.gov/deep/remediationroundtable



Connecticut Department of Energy and Environmental Protection

THANK YOU

REMEDIATION ROUNDTABLE

Next meeting: November 13, 2012



Schedule and agenda on website

www.ct.gov/deep/remediationroundtable

Submit comments to Camille Fontanella at

DEP.remедiationroundtable@ct.gov



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