

EARLY EXIT WORK GROUP

Goal / Purpose

- Sign-offs for Rapid Clean-up of Reportable Releases with No Further Obligations
- Get Reportable Releases Out of the System Quickly
- In lieu of other remedial options using Class A, B & C Exits
- Provide written certification of closure
- Incentive to encourage rapid clean-ups and avoid long-term obligations and minimize costs

Team Members

Co-chairs

Aaron Green, DEEP

Supervisor - Emergency Response and Spill Prevention Division

Nick Hastings, Woodard & Curran

Licensed Environmental Professional

Total Participants 26

- LEPs 8
- Contractors 6
- Attorneys 3
- Industry 1
- DPH 1
- DEEP 7

Key Questions – Early Exit

- What is an Early Exit?
- What releases should be eligible?
 - Did it Get Away?
 - Are Receptors at risk?
 - Different path for different scenarios?
- Who can sign off?

Other Work Groups' Work Products Will be Key to Implementation

Concepts-*Early Exit*

- What is an “Early Exit”?
 - An “Early Exit” is a process that would allow responsible parties to fully remediate certain reportable releases within 90 days from spill discovery and achieve full closure.
 - Supporting documentation submitted by a qualified person is required for closure.
- What reportable releases are eligible to try for an “Early Exit?”
 - All new releases and newly discovered historical reportable releases could be eligible.

Concepts-*Early Exit*

- Can the reportable release be fully remediated within a 90 day window which begins at the release discovery date?
 - If yes, the reportable release is eligible for a “Early Exit.”
 - Extensions may be allowed in certain circumstances
- “Did it get away?”
 - Contained Release?
 - Media Impacted:
 - Soil only?
 - Sediment/Surface Water?
 - Groundwater?
 - Receptors at Risk?

If the release, even after source removal, poses an unacceptable risk to sensitive receptors or human health and will need ongoing investigation and/or remediation beyond 90 days, the reportable release will not be eligible for an “Early Exit.”

Historic Releases

Concepts under Discussion

- Eligible when degree of uncertainty *and* risk to receptors are *both low*
- Definition of historic release? Do we need a separate early exit for historic releases found in site assessments?
- Allow longer time frames?
- Use of other lines of evidence such as GW data from existing monitoring networks?

Early Exit Evaluation Process

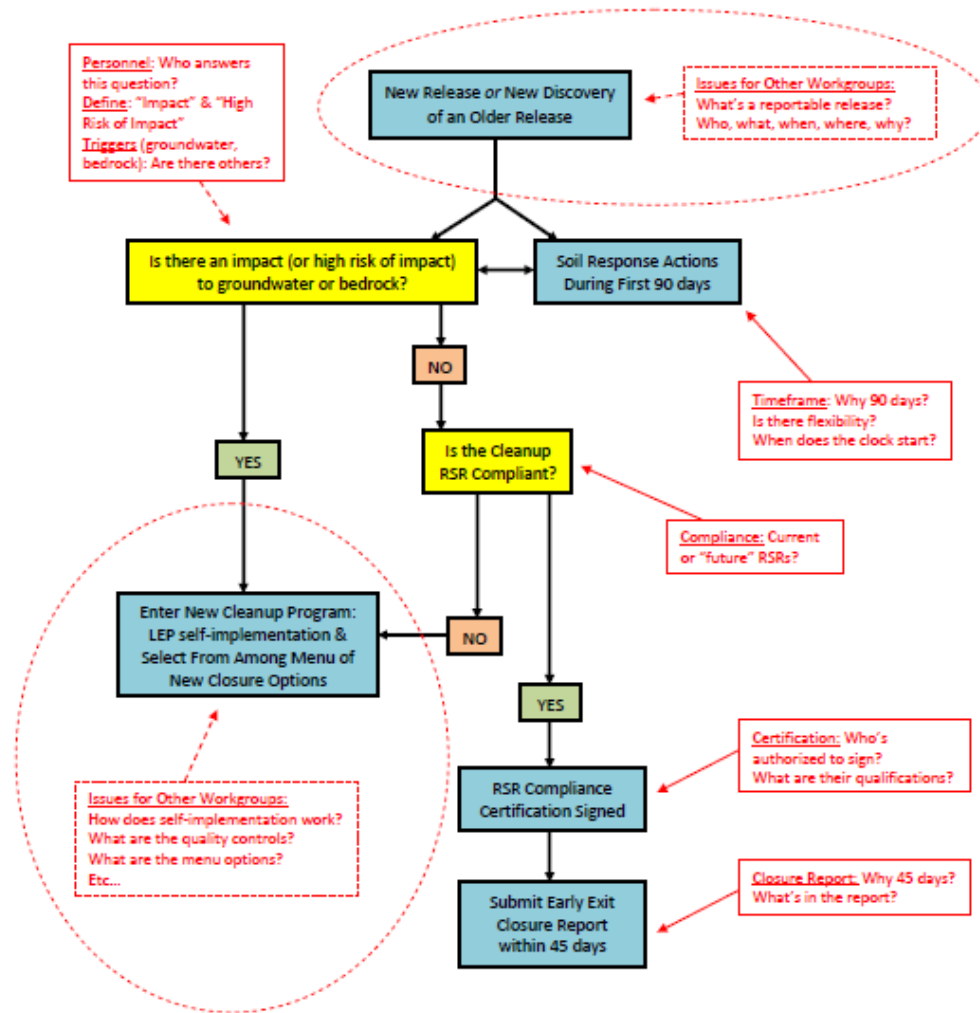
- Flow chart(s) with supporting checklist(s)
- Tiered by complexity
 - Contained Release?
 - Media impacted: Soil only? Sediment/Surface Water? Groundwater?
 - Receptors?
- Check lists & logic for each exit tier

...a work in progress, but here's a preview:

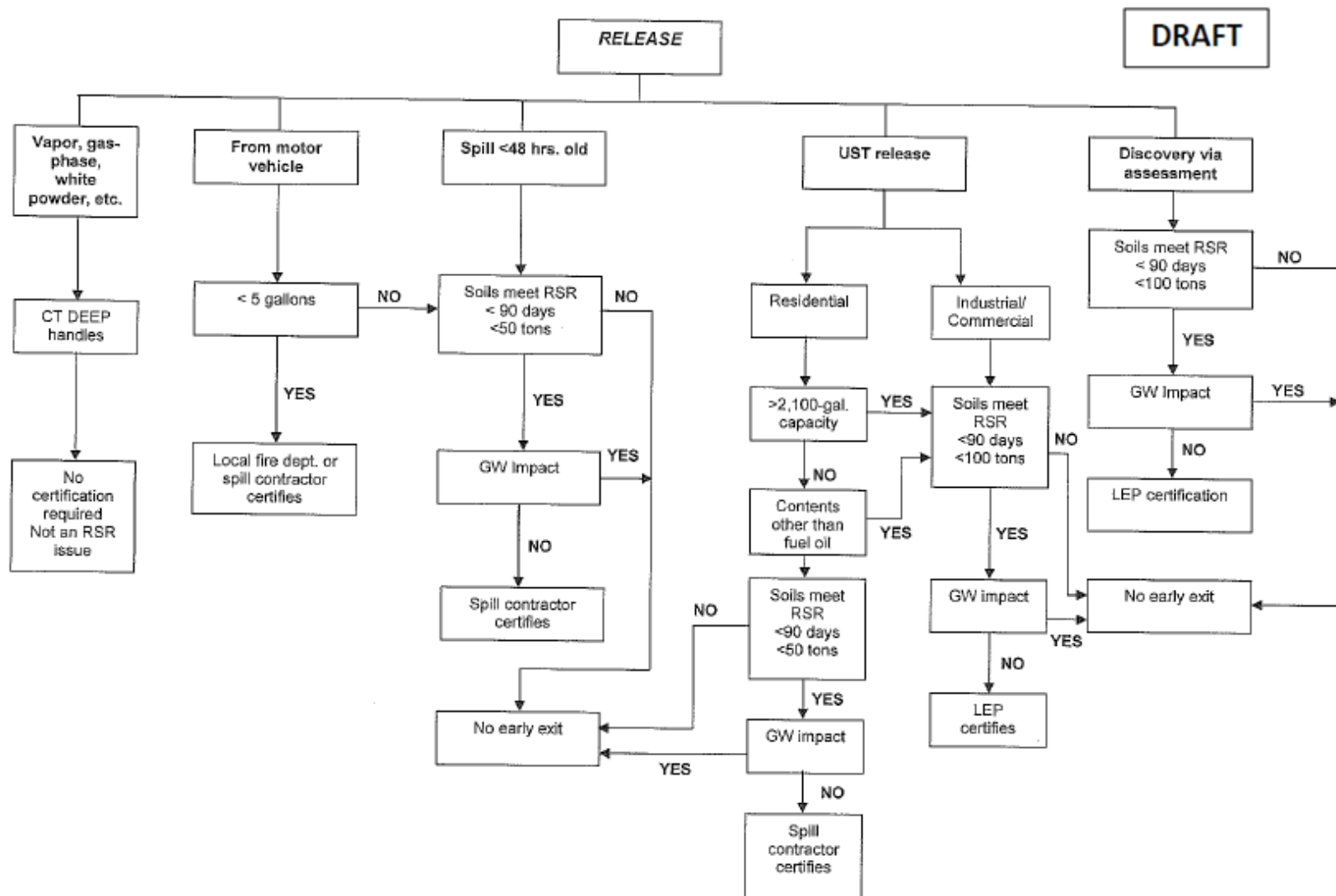
Example Early Exit Flowcharts

CT DEEP Remediation Transformation
Early Exits Workgroup - Concept Diagram #1
October 16, 2012

DRAFT



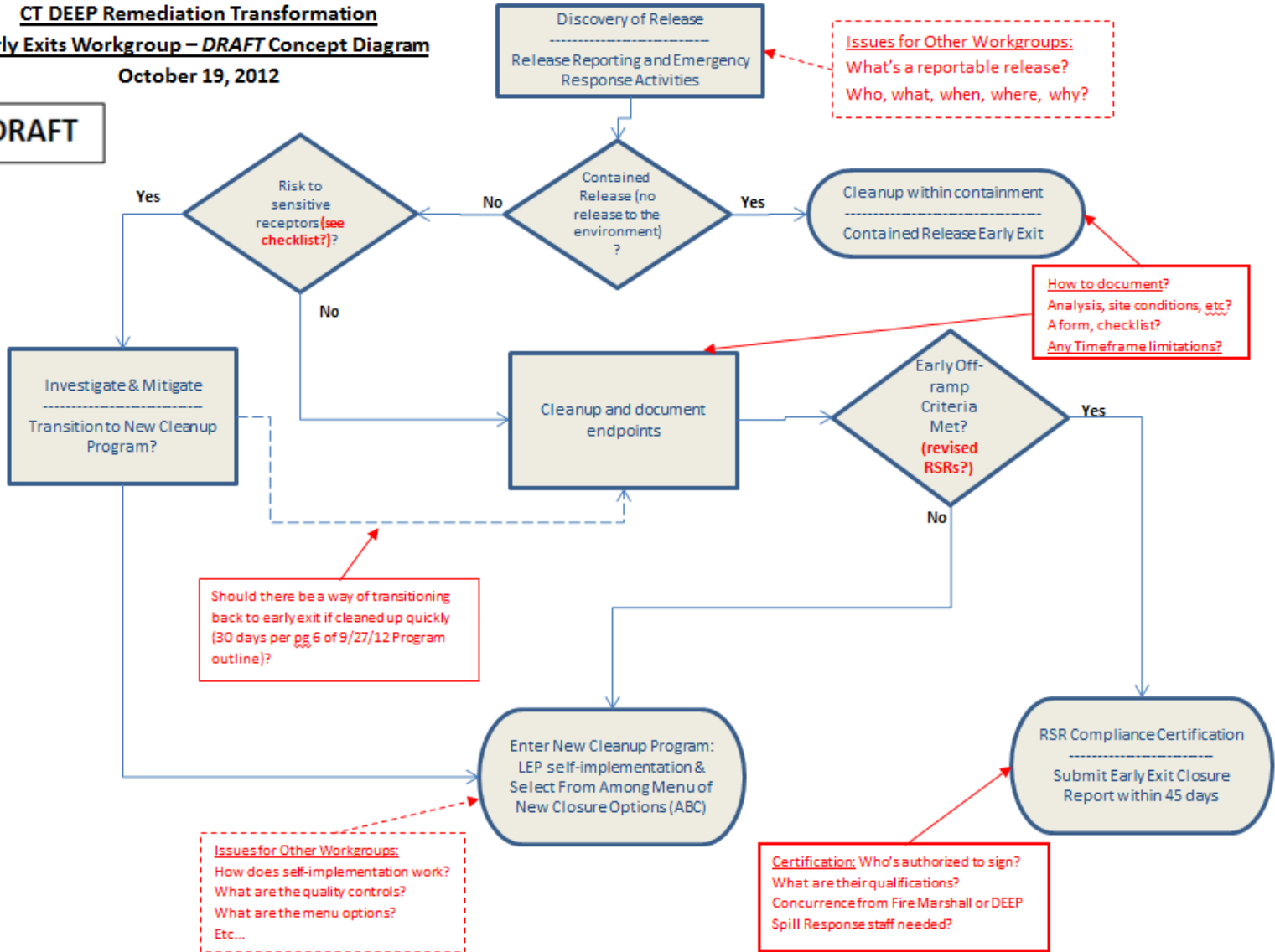
Example Early Exit Flowcharts



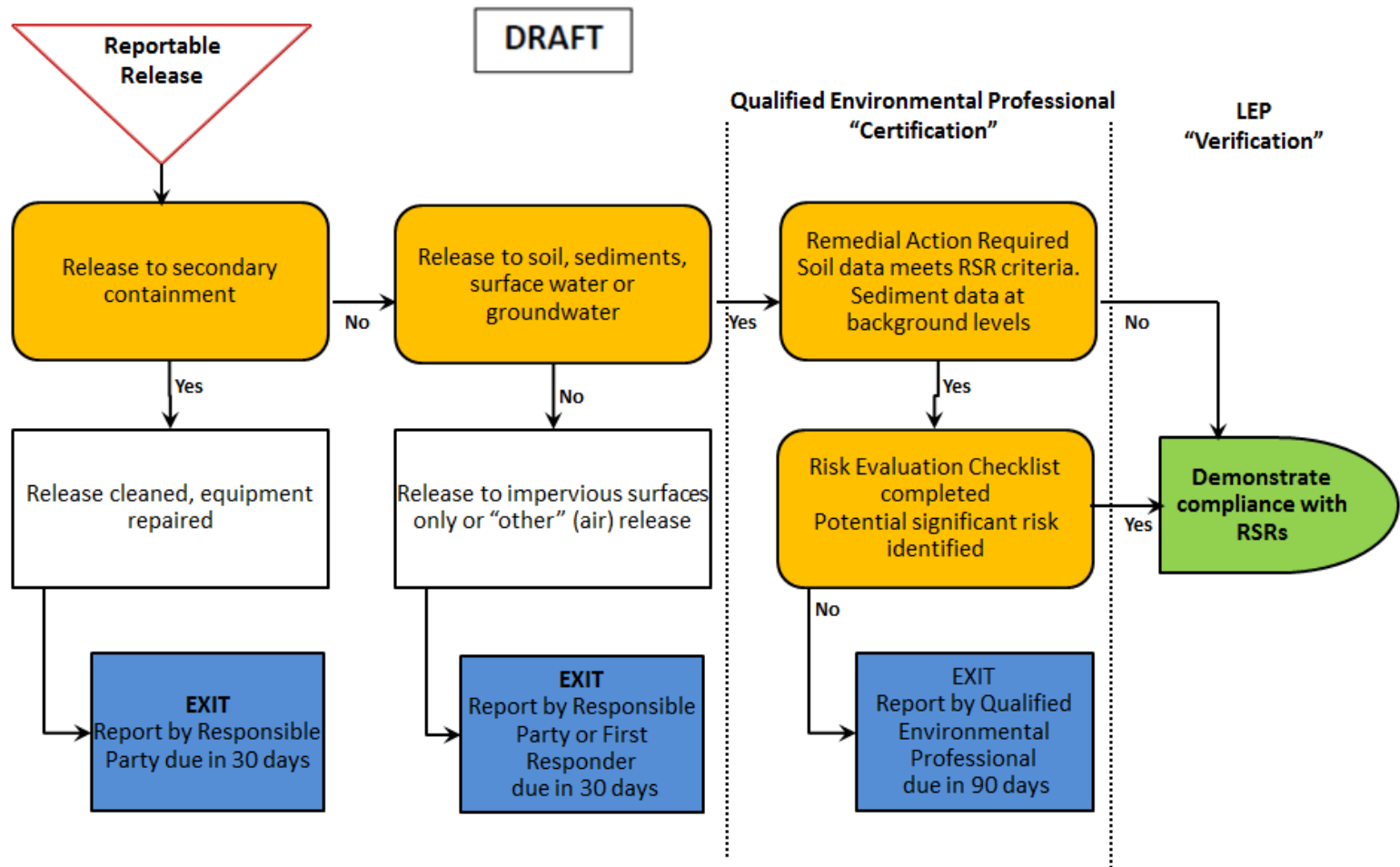
Example Early Exit Flowcharts

CT DEEP Remediation Transformation
Early Exits Workgroup – DRAFT Concept Diagram
 October 19, 2012

DRAFT



Example Early Exit Flowcharts



Evaluating Risks with Checklist(s) - Examples

What level of groundwater impacts is acceptable and in which situations?

- None detected?
- Background impacts?
- Less than RSRs?
- GW remediation by tank grave dewatering?

Checklist for potential infiltration of contaminants

- Type of contaminants
- Volume of release
- Timing of soil removal
- Volume of soil removal
- Sensitive receptors
- Soil permeability
- Depth to groundwater
- Etc.

1.a. Surrounding Land Uses (check all that apply):

Industrial Commercial Residential Agricultural

b. Sensitive Surrounding Land Uses (check all that apply):

Residential Healthcare Facility School Childcare Facility
 NDDB site Sensitive Water Resources Recreational

2. Sensitive On-site Land Uses (check all that apply):

Residential Healthcare Facility School Childcare Facility
 NDDB site Sensitive Water Resources Recreational

3. Groundwater:

Groundwater classification: GAA GA G5

On-site groundwater use: drinking water agricultural Industrial

Distance from the site to the closest off-site water supply well and the address of the property on which that well is located: _____

Is the on-site water supply well or water supply regulated by DPH? Yes No

Is the site within the zone of contribution to a public water supply well? Yes No

Is the site within an Aquifer Protection Area? Level A Level B No

4. Public Utilities:

Is public water provided to the site? Yes No

Is public water available to all developed areas surrounding the site? Yes No

Are or have on-site drinking water wells been used at the site? Yes No

If yes, dates in use: _____

Is the site connected to municipal sewers? Yes No

Have on-site septic systems been used at the site? Yes No

If yes, dates in use: _____

5. Potential Exposure Pathways:

Receptor Type	Yes	No	Unknown	Date SEH Abated
Public Well	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Private Well	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Aquifer Protection Area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Direct Exposure (soil)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Vapor Intrusion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Sediment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Surface Water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Who Can Sign Off?

Who can certify and in which circumstance(s)?

- LEPs, Emergency Clean-up Contractors, DEEP personnel, other(s)?

New “Qualified Environmental Professional/Certified Release Evaluator/Early Exit Expert” licensing program?

- A minimum number of years of relevant experience
- Training seminars with certification / exam needed?
- LEPs “pre-qualified”?
- Accountability (Audit & Enforcement programs)

Other considerations

Standard Format(s) for Certification Report?

Simplified “Conceptual Site Model” in Certification Report?

Use of “real time” GIS data base for potable wells & assessors maps?