Remediation Roundtable November 13, 2012

Transformation Breakout Session Topics and Questions for Discussion

LEP Board

- How do you think that the role of the LEP Board would change under the new program?
- What changes would you propose for the LEP Board with the new Unified Cleanup Program?
- In what ways could the LEP Board increase its effectiveness and efficiency? What new resources might the LEP Board need?
- If additional licensures became available (e.g., Early Exit Expert), would the LEP Board expand its role to oversee such licensing and licensed professionals?

Verifications and Milestones

- Which exit ramps would require a LEP verification? Something less than verification? LEP involvement? (e.g., Early Exit [no groundwater impacts], Class A [no further obligations], Class B [ELURs & ECs], Class C [long-term active remedy])
- Which project milestones would require a LEP verification? LEP sign-off?
 - A. Imminent Hazard Evaluation
- C. Remedial Action Plan (RAP)
- B. Investigation Complete (COI)
- D. Exits A/B/C
- How would each type of milestone verification or sign-off be similar or different from a final verification? How would they be used to support a final verification?
- What type and/or percentage of milestone verifications would be audited?

Audit Program

- What would trigger an audit?
- Currently, there is a three-year audit completion timeframe. Would a similar timeframe be appropriate? Would these timeframes vary with type of verification – milestone or final? Please provide suggested timeframes.
- If an Early Exit is supported by some type of certification of closure as yet undetermined, what would an audit of such a certification consist of? What happens if such a certification is rejected?

Metrics

- How would the success of the new Unified Cleanup Program be measured? What are your suggestions for key performance indicators of the new Unified Cleanup Program?
- How does your company track environmental metrics/ performance/ productivity regarding site cleanup? Please list examples (i.e., we remediated 100 tons of contaminated soil this year).
- How could DEEP measure how much pollution has been addressed?
- Would your company be willing to submit information annually to aid the Department with developing numbers for metrics?
- Does your company use any particular kind of software to help categorize and evaluate this type of information?

If you would like to submit additional comments other than those that your breakout group discussed, please send your responses to DEEP.cleanup.transform@ct.gov by November 26, 2012.