Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

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EMERGENCY AUTHORIZATION
FOR SOLID WASTE MANAGEMENT
RESULTING FROM THE NATURAL DISASTER JANUARY 27, 2015 WINTER STORM

EMERGENCY AUTHORIZATION NO. 20152054-EA
AUTHORIZATION ISSUED TO: All Municipalities, Political Subdivisions and Agencies of the State of Connecticut

A. INTRODUCTION

Pursuant to section 22a-6k of the Connecticut General Statutes, the Commissioner of the Department of Energy and Environmental Protection ("Commissioner") issues the following Emergency Authorization to address the imminent or immediate danger to the public health, safety and welfare of the citizens of the State of Connecticut in response to the destruction wrought by the January 27, 2015 Winter Storm, herein referred to as the "subject event" in Connecticut.

B. DEFINITIONS

For purposes of this Authorization only, the following terms shall have the following meanings:

1. **"Construction and demolition debris (C&D)"** means debris resulting from structural damage to buildings as well as buildings that will require demolition as a result of the disaster event, and damage to roads and bridges, and will include items such as aggregate (concrete, brick, block), wood (both clean and treated), roofing and siding materials, wallboard, metals, carpeting and flooring, insulation, glass, tile, window coverings, plastic pipe, heating and ventilating, and air conditioning systems and their components, light fixtures, furnishings and fixtures.

2. **"Disaster debris"** means materials generally considered to be not water soluble and non-hazardous in nature, including but not limited to green waste, furniture, steel, glass, brick, concrete, asphalt roofing material, pipe, gypsum wallboard, and lumber from a structure damaged or destroyed by the subject event. It also includes the incidental mixture of asbestos-contaminated debris that cannot be extracted from the disaster debris. The term includes "contaminated soil and/or sediment" and "green waste" as defined below.

3. **"Green waste"** means vegetative matter resulting from the effects of the subject event, and includes uprooted vegetation, leaves, branches, and tree stumps.

4. **"Contaminated soil and /or sediment"** means, as defined in the Connecticut Department of Environmental Protection General Permit for Contaminated Soil and Sediment Management (Staging and Transfer), treated or untreated soil and/or sediment affected by a known or suspected release and determined, or reasonably expected to contain substances exceeding

Residential Exposure Criteria or GA Pollutant Mobility Criteria, as these terms are defined in section 22a-133k-1 of RCSA. It does not mean contaminated soil and/or sediment that either contains or is considered to be hazardous waste.

5. **"Processing"** means transfer and storage, separation and segregation, chipping, grinding, shredding, and crushing. Processing does not include burning or incineration.

C. PARTIES

1. The Department of Energy and Environmental Protection ("the Department") is a duly constituted administrative agency of the State of Connecticut, having its principal office at 79 Elm Street, Hartford, CT 06106.

2. Persons who are subject to this Authorization are any municipalities, political subdivisions, or government agencies responsible for disaster debris generated as a result of the subject event.

D. STATEMENT OF FACTS AND LAW

1. It is anticipated that the impact of the January 26, 2015 Winter Storm on the state of Connecticut will cause widespread damage throughout the State. The affected area comprises the entire state of Connecticut and is referred to herein as the "Emergency Area."

2. By the Governor's Emergency Declaration, the Governor declared that a state of emergency exists throughout the state of Connecticut, based upon the serious threat to the public health, safety and welfare posed by the subject event.

3. The Department finds that the subject event has created a state of emergency threatening the public health, safety, and property throughout the Emergency Area. As a result of the emergency, immediate action by Connecticut citizens and State and local government is necessary to repair, replace and restore structures, equipment, surface water management systems, works and operations damaged by the subject event, all of which require enhanced and/or expedited waste management services.

4. The Department finds that an emergency authorization is required to address the need for immediate action because normal procedures would not result in a sufficiently timely action to address the emergency.

5. The Department finds that immediate, strict compliance with the provisions of the statutes, rules or authorizations noted within the Authorization would prevent, hinder, or delay necessary action in coping with the emergency, and that the actions authorized under this order are narrowly tailored to address the immediate need for action and are procedurally fair under the circumstances.

6. Based on the above findings, the Department concludes that the emergency caused by the subject event continues to pose an immediate danger to the public health, safety, welfare and requires an immediate order of the Department.

7. Under the General Statutes of Connecticut, 22a-6k, the Commissioner is authorized to issue this Emergency Authorization.

8. Suspension, flexibility and expediting certain statutes and rules noted within this Authorization and related to waste management is required so as to not prevent, hinder, or delay necessary action in coping with the emergency.

E. SCOPE OF AUTHORIZATION

Each Town, City and Borough of the State of Connecticut, political subdivision, or government agency ("Authorization Holder") is hereby authorized, consistent with all terms and conditions of this authorization, to conduct the activities identified herein:

1. **Designate pre-identified debris management sites (DMSs) (Attachment A) as official sites** for the storage and processing of disaster debris for ultimate disposal at permitted solid waste and recycling facilities.

2. **Operate pre-identified DMSs under Section 22a-6k of the General Statutes of Connecticut through an emergency authorization.**

3. **Identify and operate new DMSs** on public and private lands, as may be needed, in the event that pre-identified sites are not serviceable (e.g. flooding, not accessible, etc.) due to disaster related impacts.

4. This Authorization is issued to the Authorization Holder for activities:
   A. For municipalities, at:
      i. Any municipal facilities; and
      ii. Any other properties owned by the municipality; and
   B. For political subdivisions and state agencies at:
      i. Any property owned by that political subdivision and/or state agency.

5. The Authorization Holder shall document via photographs the pre-subject event conditions of the site(s) identified for the activities authorized by this Authorization.

6. **Existing permitted solid waste and recycling facilities may carry on with solid waste management activities with some flexibility and suspension of permitting conditions** related to operating hours, temporary stockpiling, throughput volumes, separation of debris, etc., so as to not prevent, hinder, or delay necessary action in coping with the emergency. Permitted Solid Waste Facilities shall notify the Commissioner of such suspensions within five (5) calendar days of the activities being initiated.

7. Authorized activities included in the operation of the DMSs include the staging, processing, storage, and transferring of disaster debris consisting of the materials checked below:
   X **Green waste** generated by the Event and suitable for subsequent reuse, or through recycling or disposal at permitted solid waste facilities.

   ☐ **All** solid wastes.

F. TERMS AND CONDITIONS

1. This Authorization will be effective in the Towns, Cities and Boroughs of the State of Connecticut.

2. The Authorization holder shall notify by any means possible, Robert C. Isner or Gabrielle Frigon of the Department, of the name(s) and address(es) of all the sites at which the authorized activities will take place within forty eight (48) hours of selection or initial placement of waste at the site(s). Within five (5) calendar days of the subject event, the Authorization Holder shall submit the list of sites including names and addresses to the Department in writing via electronic mail or traditional mail.

3. This Authorization applies to facilities and activities, which are conducted or operated by a private entity, state agency, regional organization, municipality, or on behalf of a municipality or government agency or organization.

4. Owners and operators of solid waste management facilities permitted by the Department before the subject event, are hereby authorized to make all necessary repairs to the permitted facility to restore essential services and the functionality of storm water and leachate collection and management systems damaged by the subject event, without prior notice or authorization from the Department. Written notice of repairs must be provided to the Department within thirty (30) days of commencing repairs.

5. **Uncontaminated green waste** may be received, processed and transferred at any emergency site authorized by the Department to store and process green waste, or at any permitted clean wood waste processing facility. Landfilling of green waste is not permitted.
   A. Any green waste received at the authorized facilities in loads of wastes resulting from the subject event shall be inspected for signs of the presence of the Asian Longhorn Beetle and the Emerald Ash Borer.
      Signs indicating possible Asian Longhorn Beetle infestation can be found at the CT DEP webpage:
      http://www.ct.gov/dep/cwp/view.asp?a=2697&q=421754&depNav_GID=1631#signs

      Signs indicating possible Emerald Ash Borer infestation can be found at the CT DEP webpage:
      http://www.ct.gov/dep/cwp/view.asp?a=2697&q=464598&depNav_GID=1631

   B. Any green waste suspected of being infested by either the Asian Longhorn Beetle or the Emerald Ash Borer should be identified at the source of generation and handled in accordance with existing quarantine agreements. Such waste shall be handled separately from other types of waste generated as a result of the subject event and shall not be delivered to the authorized facilities.

   C. The Authorization Holder's designated project manager shall conduct a visual assessment for possible pest infestation as part of the on-site daily inspections.

D. If signs of infestation are observed:
   i. Digital photos and careful identification notes must be provided to the Connecticut Agricultural Experiment Station (Deputy State Entomologist direct phone line: 203-974-8474; and e-mail CAES.StateEntomologist@ct.gov.).
   ii. The infested green waste shall be: segregated from other green waste; marked as segregated; securely stored and kept reasonably intact.
   iii. Any handling activities (chipping; moving) must be postponed until an investigator from, or designated by, the Connecticut Agricultural Experiment Station, has examined the potentially infested green waste.
   iv. Any truck load tickets and other documentation of deliveries shall note whether a pest infestation assessment has occurred.

6. **Construction and demolition debris (C&D), which is mixed with disaster debris,** need not be segregated from other solid waste prior to disposal at a permitted processing facility or in a permitted landfill.

7. **C&D that is either source-separated or is separated from other storm-generated debris** at an authorized staging area, or at another area specifically authorized by the Department, may be managed at a permitted C&D volume reduction facility and shall not be mixed with any other wastes.

8. **Household garbage, putrescible wastes, bulk food wastes and other similar wastes** shall be disposed in a permitted landfill or, except for asbestos containing material, in a waste-to-energy facility. Non-recyclables and residuals generated from segregation of disaster-generated debris shall be disposed of at a permitted landfill or waste-to-energy facility. Alternative means of recycling and disposal, such as composting, will be considered by the Department for approval on a case-by-case basis under this emergency authorization when requested by a municipality.

9. **Household hazardous wastes and conditionally exempt business generated hazardous wastes** may be disposed through emergency hazardous waste collection efforts of local governments, regional waste authorities, the U.S. EPA, the Department or other authorized emergency response agencies.

10. **Ash from the combustion of disaster debris other than green waste** shall be disposed only in a permitted landfill.

11. **For asbestos disposal:** For subject event generated debris only, the Department waives the requirement of Solid Waste Regulation Section 22a-209-8 paragraphs 1 through 3, Special Waste Disposal. Prior notification to the Department and specific authorization from the Department for the disposal of asbestos is waived for the duration of this Emergency Authorization, except that the person(s) responsible for such work shall notify the Department no later than the next business day after commencing such demolition or cleanup. The information shall specify the source, quantity and type of asbestos waste having been disposed as well as the storage or disposal facility/location. Burning of asbestos waste is prohibited.
    In accordance with the *US EPA's Guidance for Catastrophic Emergency Situations Involving Asbestos dated December 23, 2009*:
    A. Building debris on the ground from structures totaled by the subject event is not subject to the Asbestos NESHAP requirements related to demolition and renovations, transport, or disposal requirements.

B. The demolition of buildings subject to a state or local government issued demolition order based on a determination that the building is structurally unsound and in danger of imminent collapse, the following applies:
   i. The owner/operator does not have to inspect for asbestos and does not have to remove the asbestos prior to demolition, burning is not allowed;
   ii. The ten (10) day advance notification is reduced to twenty-four (24) hours;
   iii. Emissions control (wetting), handling, transport, disposal requirements still apply;
   iv. Information on the government issued Demolition Order must be attached to the notification; and
   v. A supervisor/authorized representative trained with regard to the Asbestos NESHAP requirements must be on site.

12. **Animal Carcasses** shall be disposed by composting, landfilling or on-site burial.
   A. Composting of animal mortalities shall be conducted in such a manner to minimize odor and leachate using the best management practices set forth in "Composting Road Kill", Cornell Waste Management Institute, 2007 http://cwmi.css.cornell.edu/roadkillfs.pdf

   B. Landfilling shall take place at any permitted, operating MSW or bulky waste landfill.

   C. On-site burial shall take place only where the bottom of the burial pit is a minimum of four (4) feet above the seasonal high groundwater table and bedrock, and shall have a minimum of two (2) feet soil cover over the mortalities. Other separation distance shall be: one-hundred (100) feet to property line; three hundred (300) feet to residence or business; two hundred feet (200) feet to private well; five hundred (500) feet to public well; two hundred (200) feet to surface water or wetland; and fifty (50) feet to subsurface drainage or ditch draining to a water course.

13. **Scrap motor vehicles, recreational boats, white goods, and other metals** should be considered for storage at a temporary debris staging site until delivery to appropriate metals recycling facilities.

14. **Contaminated Soil and/or Sediment (not hazardous or considered hazardous)** resulting from the disaster shall be transferred and stored at a facility registered under the General Permit for Contaminated Soil and/or Sediment Management (Staging and Transfer). For the purposes of disaster debris cleanup, newly sited temporary facilities for the staging and transfer of contaminated soil and/or sediment are authorized to operate under this emergency authorization and must follow all conditions related to General Permit for Contaminated Soil and/or Sediment Management (Staging and Transfer). New sites operating under this Authorization shall register under the General Permit within thirty (30) days after expiration of this Authorization.

15. All other solid waste not generated from activities related to the cleanup of wastes generated by the subject event must be disposed of in accordance with the provisions section 22a-208a of the General Statutes.

16. Permitted solid waste facilities, which accept wastes generated by the subject event in accordance with the terms of this Authorization may accept such waste as the facility is currently permitted to accept for disposal, processing or storage without the need to modify existing permits to address any long-term impacts of accepting disaster debris on operations and closure which are not addressed in existing permits. Long-term impacts are those, which

will extend past three (3) months from the date of issuance of this Authorization. The requests for modification shall be submitted as soon as possible, but no later than April 27, 2015. No permit fee will be required for any modifications necessitated solely by clean-up activities related to the subject event.

17. The Department supports the legitimate recycling of all solid waste including disaster debris resulting from the subject event, and encourages the curbside or front-end separation of recyclable materials prior to disposal. Nothing herein shall be construed to discourage or prohibit such legitimate recycling efforts.

18. Due to the unforeseen and uncontrollable circumstances created by the subject event, the Department authorizes a ninety (90) day extension for all hazardous waste generators within the Emergency Areas affected by the subject event for the storage of their hazardous wastes on site.

19. Permittees adversely affected by the subject event may request on a case-by-case basis an extension for any of the deadlines specified in their permits.

20. The Department issues this Emergency Authorization solely to address the emergency created by the subject event. This Authorization shall not be construed to authorize any activity within the jurisdiction of the Department except in accordance with the express terms of this Authorization.

21. Any document required to be submitted to the Commissioner under this authorization or any contact required to be made with the Commissioner shall, unless otherwise specified in writing by the Commissioner, be directed to:

    Robert C. Isner, Director
    Bureau of Materials Management and Compliance Assurance
    Department of Energy and Environmental Protection
    79 Elm Street, Hartford, CT 06106-5127
    (860) 424-3264
    FAX #(860) 424-4059
    robert.isner@ct.gov

22. The Authorization Holder shall allow any representatives of the Commissioner to inspect the work authorized herein at reasonable times to ensure that it is being or has been accomplished in accordance with the terms and conditions of this Authorization.

23. This Authorization shall be non-transferable.

24. This Authorization is subject to and does not derogate any present or future property rights or powers of the state of Connecticut, and conveys not property rights in real estate or material nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state, or local laws or regulations pertinent to the property or activity affected hereby.

25. Nothing in this Authorization shall eliminate the necessity for obtaining any other federal, state, or local permits or other authorizations that may be required.

26. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this Authorization by the Authorization Holder shall be signed by a duly authorized representative or agent of the Authorization Holder and by the individual responsible for actually preparing such document, each of whom shall certify in writing as follows:

> "I have personally examined and am familiar with the information submitted in this document and all attachments and certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense."

27. The Commissioner may order summary suspension of this Authorization in accordance with section 4-182 of the General Statutes. This Authorization may be revoked, reissued, modified or suspended in accordance with applicable law.

28. This Emergency Authorization shall take effect immediately and expire in thirty (30) days from the date of issuance of this Authorization unless modified or extended by further Authorization.

Issued on this 26th day of January, 2015.

Yvonne Bolton

Yvonne Bolton
Chief, Bureau of Materials Management and Compliance Assurance

ATTACHMENT A

Debris Management Guidance from State of Connecticut

State Disaster Debris Management Plan, September 2008 (taken from - CHAPTER 5)

5.2 Debris Management Sites (DMS)

5.2.1 Overview

The advanced identification and securing/acquisition of DMS is the responsibility of the State and local governments. Debris management guidance from the USACE and FEMA strongly recommends that both State and local governments be responsible for pre-identifying DMS, preferably on public property. This will allow post-disaster cleanup efforts to begin early and in an efficient manner. DMS must be approved by CTDEEP to protect public health and the environment, as well as to ensure that the owner/operator of the DMS be qualified to receive Public Assistance funds from FEMA.

5.2.2 Environmental Considerations

After a major natural disaster occurs, the emphasis is on rapid debris clearance from the public right-of-ways. The result is that DMS receive debris faster than can be reduced and ultimately disposed of. Consequently, these areas must be properly sited because of the potential of adversely impacting the land, water, and air of the State. These negative impacts could include: surface and ground water contamination, soil contamination, impacts to vegetation, odor, and dust. Therefore, the siting of DMS using the recommended criteria described in the following sections can greatly minimize potential impacts to the environment.

5.2.3 Site Selection Guidelines for Debris Management Sites

DMS are temporary locations that can be used for the duration under a CTDEEP Emergency Authorization and/or General Permit as authorized by CTDEEP. Consistent with FEMA guidance and State policy and programs, the CTDEEP has assembled the following guidelines for the selection of DMS:

- Pre-designated sites should preferably be on public property and generally consist of 10 acres or more, depending on anticipated needs. However, smaller sites may be appropriate based on the type of waste being managed and space constraints. Use public lands first to avoid costly leases. Use private land only if public sites are unavailable. If private lands are utilized for municipal debris management operations, they must have government (or its designated contractor) oversight and management.
- The required size of the site will depend on the expected volume of debris to be collected and planned volume reduction methods. As a general rule, larger sites mean fewer sites and, hence, easier site closeout. However, larger sites may create logistical problems.
- Large open sites are needed for any type of debris staging activity. Paved sites are best. Semi-paved or large parking lots paved in stone dust or gravel is the next best option. Meadows are least desirable because they may be inaccessible because of saturated soils after extended and heavy precipitation.
- If possible, per FEMA guidance, the soil, groundwater and/or surface water at and near a proposed staging area should be tested prior to receipt of disaster generated debris to establish pre-existing baseline conditions.
- DMS for debris other than green waste should not be allowed in public source water protection areas including aquifer protection areas, public drinking water supply watersheds, and public well source areas.
- In no case should any DMS be located in or within 100 feet of a wetland area or watercourse.
- DMS for debris other than green waste shall not be located within 200 feet of a watercourse, waterbody, or wetland, unless otherwise approved by CTDEP. Impacts from noise, dust, and traffic that are tolerated by the public early in a disaster recovery, may have to be curtailed later. Avoid locating the DMS near residential areas, schools, and hospitals.

- Sites should not have critical habitat or rare ecosystems, threatened and/or endangered species, historic and/or archaeological sites.
- Sites should have good ingress/egress to accommodate heavy truck traffic and have a site configuration that will allow for an efficient layout.

5.2.4 Site Operation of a Debris Management Site

CTDEEP has assembled the following guidance for operating a DMS based on FEMA guidance. DMS should have:

- Visible, demarcated buffer areas at the 200-foot or 100-foot wetland setback line.
- Stormwater controls, such as silt fences, to prevent discharge of contaminated runoff into water bodies where such discharge may cause violations of CTDEEP regulations.
- Some method to control the off-site migration of dust, wood chips, or other debris residuals from vehicular traffic and from the handling of debris and ash.
- An adequate supply of water to ensure that the debris is adequately wet during the segregation, processing and/or packaging of the waste to prevent risk of fire and/or dust migration.
- Some type of access control to prevent unauthorized dumping and scavenging.
- Monitors to correctly identify and segregate waste types, especially hazardous waste from non-hazardous waste, for appropriate management.
- Oversight management for the site.
- When staging debris other than green waste, if possible:
    - install wells and perform groundwater sampling;
    - conduct spot soil sampling at "hot" areas such as household hazardous waste (HHW), ash, other waste types;
    - provide specific fuel storage areas;
    - take videos, photos of the site before operations begin;
    - periodically sketch/map layout including "hot" areas; and
    - prepare quality assurance reports, spill reports, etc. as part of the overall project.

5.2.5 Site Remediation/Closure Checklist for Debris Management Sites

The testing and closure of DMS will be undertaken in accordance with all requirements of Connecticut statutes and regulations and federal laws. The following broad guidelines apply to the closure of DMS:

- Owner/operators of the DMS will be responsible for closure of the site in accordance with CTDEEP requirements, including environmental sampling, if needed.
- All disaster related debris must be removed by the expiration of the Emergency Authorization and/or General Permit, unless otherwise authorized by CTDEEP.
- Mulch and wood chips produced from processing uncontaminated green waste may be left on-site if prior approval is obtained from CTDEEP. CTDEEP will consider these requests on a case-by-case basis.
- Areas that were only used to stage uncontaminated green waste, or ash from authorized burning of solely vegetative debris, will not require any environmental sampling after the debris or ash is removed unless there is reason to believe that the area may have become contaminated (e.g., significant visible staining or known contaminant releases in the area).
- Areas that were used to stage mixed debris, or ash from burning mixed debris, will normally require environmental sampling after the debris or ash is removed, unless there is reason to believe that no contamination in the area occurred (e.g., the area is paved with asphalt or concrete and there is no visible evidence of staining or known contaminant releases).
- Areas that were used to stage household hazardous waste and hazardous waste will require environmental sampling after all material has been removed from the site. These sites may require possible remediation to meet the goals of the State's Remediation Standard Regulations, Regulations of Connecticut State Agencies (RCSA) 22a-133k-1 through 22a-133k-3.

- When sampling of soils and groundwater is needed, it should typically include at least four soil samples and one groundwater sample collected from a monitoring well or direct sampling method in areas showing significant visible staining or areas believed to be impacted by the staged waste or ash. Unless otherwise approved by CTDEEP, these samples should normally be analyzed for total RCRA metals, volatile organic compounds and semi-volatile organic compounds using approved EPA methods and CTDEEP protocols. CTDEEP may also require other approaches to conducting environmental sampling at staging areas on a case-by-case basis, such as requiring that the site meet the criteria of the Remediation Standard Regulations, RCSA Connecticut State Agencies (RCSA) 22a-133k-1 through 22a-133k-3.

5.2.6 Additional Testing Criteria

The following is additional testing criteria that may be required, at the discretion of the Commissioner, under certain debris staging situations:

5.2.6.1 Ash Testing

- All ash piles in mixed debris staging sites should be tested using the Toxicity Characteristic Leaching Procedure. One composite sample from each separate ash pile should be analyzed. A minimum of ten samples taken from different strata within the pile is appropriate to develop the composite sample, and if unacceptable contamination is not found, ash may be transported out-of-state to a permitted landfill or placed in a permitted Connecticut ash landfill
- If unacceptable levels of contamination are detected, the material should be further evaluated and placed in a permitted ash landfill (if contamination is within permit limits) or a hazardous waste landfill, as appropriate.

5.2.6.2 Soil Testing

- Soils should be tested for the presence of volatile hydrocarbon contamination. Samples should be taken immediately below the surface. This testing should be done if it is suspected that they were hazardous materials, such as oil or diesel fuel spills, dumped on the site. This phase of the testing should be done after the stockpiles are removed from the site.
- If burning is conducted, the entire burn site should be inspected for any areas of discoloration, odor, or obvious problems. Such areas should be identified and restored, as necessary.

5.2.6.3 Groundwater Testing

- Groundwater should be tested on selected sites to determine the probable effects of rainfall leaching through either the stockpile areas or ash areas if burning is conducted. Although every effort must be made to avoid siting DMS in areas important for public water supply (section 5.2.3), it is possible that DMS could of necessity be sited in areas where the groundwater used for drinking water, whether through public or private drinking water supply wells.
- Runoff from stockpiled debris within the storage areas has the potential to contaminate groundwater. Although the probability of contamination is considered low, testing is needed because of the importance of protecting water quality and assessing consistency with Connecticut's Water Quality Standards, particularly in an area served by private drinking water supply wells.
- Groundwater monitoring wells or temporary sampling points should be placed around the perimeter of the stockpiles (especially for stockpiles of things like white goods, electronics, HHW, etc) that have remained for an extended period of time prior to final disposal, and burn piles, to determine if there is any type of contamination.

- Testing should occur at selected sites after all debris is removed. Results of such testing will be compared to the criteria defined in the Remediation Standard Regulations, RCSA 22a-133k-1 through 22a-133k-3 for the applicable groundwater classification, as defined in the Connecticut's Quality Standards (authorized by the CGS Section 22a-426) and associated water quality classification maps.
- If applicable, results should also be compared to Drinking Water Action Levels as identified by the Drinking Water Section of the DPH.

5.2.6.4 Generic Checklist for Quality Assurance at Closeout

CTDEEP presents a generic checklist for Quality Assurance (QA) that should be considered at the close-out of each DMS. The Responsible Party for the site is responsible for closure in accordance with all applicable federal, State and local requirements. The generic checklist includes, but is not limited to, the following:

- Lease special conditions met?
- Debris stockpiles removed and disposed?
- Ash pile tested, removed, disposed?
- *Illegally filled or disturbed wetlands* restored and locations noted on appropriate State and municipal maps?
- Chain of custody records complete for the site?
- Location of storage area stockpiles marked on plans?
- Contractor petroleum and HHW spills remediated?
- Perimeter berms leveled and topsoil restored?
- Existing groundwater monitoring wells identified on map, secured and restored?
- Environmental records submitted (contractor groundwater and air quality monitoring if any, chain of custody records for HHW, other state approvals)?
- Site secured wherever stockpiles (chips, tires, etc.) do remain, to discourage illegal dumping?
- All contractor equipment and temporary structures removed?
- Compare baseline data of the temporary site to conditions after the stockpile is removed and the contractor vacates the site.
- Use GPS to locate the sites for future reference needs.

5.2.7 Completing Closeout

CTDEEP should be informed in writing when all closure activities at the DMS area are completed. If environmental sampling was conducted as part of the closure activities, then the closure notice should include the results of this sampling, unless otherwise approved by CTDEEP.