



*Environmental Professionals' Organization of Connecticut*

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Environment Committee

Senator Meyer, Representative Roy and Members of Environment Committee

Testimony submitted by Seth Molofsky, Executive Director

Environmental Professionals' Organization of Connecticut (EPOC)

**Raised Senate Bill No. 120 AN ACT AUTHORIZING REVIEW OF THE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION'S GUIDANCE  
STATEMENTS AND POLICIES BY THE GENERAL ASSEMBLY'S REGULATION  
REVIEW COMMITTEE.**

I am submitting this testimony on behalf of the Environmental Professionals' Organization of Connecticut (EPOC). EPOC was formed in 1996 to represent the interests of Connecticut's Licensed Environmental Professionals (LEPs) by providing information, training and updates regarding the LEP program in Connecticut. The organization has approximately 500 members representing numerous technical disciplines all working in the area of investigation and cleanup of environmentally-impacted sites in Connecticut.

It is EPOC's opinion that, in some circumstances, a Department of Environmental Protection guidance document or policy is more appropriately a regulation. Therefore, EPOC is supportive of raised Senate Bill 120 in that it provides the regulated community with a mechanism to request an evaluation as to whether a guidance document or policy constitutes a regulation.

EPOC remains committed to work with and support the Department of Environmental Protection in our combined efforts to generate technically defensible guidance documents or policies in circumstances where a guidance document or policy is more appropriate than a regulation. We also appreciate the opportunity to work with the Department of Environmental Protection to develop regulations that are technically sound and practical to implement when new or modified regulations are called for.

Thank you for the opportunity to present EPOC's views on **Raised Senate Bill No. 120**. If you have any questions, please contact me at (860) 537-0337, or Ted Sailer, Chair of EPOC Legislative Committee at (203) 245-7744.