

CONNECTICUT CONSTRUCTION INDUSTRIES ASSOCIATION, INC.



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Senate Bill 121, An Act Concerning the Extension of General Permits Issued by the Department of Environmental Protection Environment Committee February 22, 2010

CCIA Position: Support with amendments

The Connecticut Construction Industries Association, Inc. is the most diverse commercial construction industry trade association in Connecticut. Formed over 40 years ago, CCIA is an organization of associations, where all sectors of the commercial construction industry work together to advance and promote their shared interests. CCIA members have a long history of providing quality work for the public benefit.

CCIA is comprised of nine divisions, including the Associated General Contractors of Connecticut, Inc.; The Connecticut Road Builders Association, Inc.; Utility Contractors Association of Connecticut, Inc.; The Connecticut Ready Mixed Concrete Association, Inc.; and Connecticut Asphalt and Aggregate Producers Association. CCIA has more than 350 members statewide, including contractors, subcontractors, suppliers and professional organizations that service the construction industry.

Senate Bill 121, An Act Concerning the Extension of General Permits Issued by the Department of Environmental Protection, would allow a general permit to continue in effect by the DEP Commissioner beyond its expiration date after notice of tentative determination to renew the permit.

Authorizing an extension of a general permit makes a great deal of sense. Senate Bill 121 would alleviate uncertainty for businesses operating under a general permit and save administrative costs for the state.

Under SB 121, a permittee would remain technically in compliance with the terms of a general permit after DEP issues a notice of tentative determination to renew the permit and until the agency actually issues a new permit. However, the open-ended nature of the continuance may very well render the expiration date in the general permit superfluous. One reason for expiration dates in permits is to allow DEP to assess, based on experience, the terms and conditions contained in the GP and to make adjustments to it on a (relatively) timely basis. Even with staffing limitations, DEP should be able to conduct a periodic review and adjust the permit as necessary. The extension in the permit could be limited to a reasonable time period such as two or three years.

Please contact Matthew Hallisey of CCIA at (860) 529-6855 if you have any questions or if you need additional information.

