

# Remediation Process Improvement Initiative and Remedial Action Permit Update

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# RPII/RAP Update

- ▶ DEP has been working on the concerns raised by stakeholders as part of RPII
  - ▶ Workgroups were formed to address issues raised by the RPII stakeholder group
  - ▶ Actions taken to improve processing of Remedial Action Permits

# RPII Update

- ▶ Three workgroups were formed to address issues raised by the RPII stakeholder group
  - ▶ A process for discussing CSRR comments/deficiency letters and technical disagreements
  - ▶ Developing guidance/training for LSRPs on the importance of documentation and the avoidance of common mistakes
  - ▶ Evaluating CSRR's current processes and criteria for conducting additional reviews

# RPII Update

- ▶ A process for discussing CSRR comments/deficiency letters and technical disagreements
  - ▶ Process currently in place:
    - ▶ Comment letters and Notices of Incomplete document/remedial action permit application are reviewed by a DEP supervisor
    - ▶ LSRPs and PRCRs should discuss technical disagreements with the DEP staff person first, then the supervisor, then the bureau chief

# RPII Update

- ▶ Stakeholders' Request: Re-establishing the Technical Review Panel (TRP) to help resolve technical disputes between DEP and LSRPs
  - ▶ DEP used to have a TRP
  - ▶ DEP strongly considering re-establishing it
  - ▶ More information on this will be discussed at the November 2 RPII stakeholder meeting

# RPII Update

- ▶ Developing guidance/training for LSRPs on the importance of documentation and the avoidance of common mistakes
  - ▶ Workgroup identified topics for training
  - ▶ Two upcoming training sessions
    - ▶ Tracking Areas of Concern and presentation of data
    - ▶ Remedial action permit applications, remedial action reports, and receptor evaluations

# RPII Update

- ▶ Evaluating CSRR's current processes and criteria for conducting additional reviews
  - ▶ Bureau of Inspection and Review's current process
    - ▶ All documents are required to be inspected per SRRA; inspection conducted by inspectors; inspectors make determination as to whether additional review is needed
    - ▶ Majority of documents do not have additional review conducted
    - ▶ Majority reviewed are component only reviews – e.g., ecological review

# RPII Update

- ▶ Workgroup determined that it would be helpful to develop flowcharts showing the inspection and review process in the Bureau of Inspection and Review
- ▶ DEP currently drafting flowcharts to share with the workgroup in early November; when final will be shared publicly
- ▶ Workgroup also discussed criteria for conducting additional reviews



# Remedial Action Permitting Update

- ▶ Changes made to date:
  - ▶ Moved administrative tasks to other groups so permit reviewers can focus on technical reviews
  - ▶ Prioritized certain permit types
  - ▶ Developed tools to assist LSRPs
    - ▶ ECCC documents
    - ▶ Checklists being finalized and will be posted soon

# Remedial Action Permitting Update

- ▶ Changes to processing permit applications will be made
- ▶ Further information will be provided at the November 2 RPII stakeholder meeting

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# Questions?