

Evaluation of Corrective Action Conferences
Underground Storage Tank Section
October 4, 2005

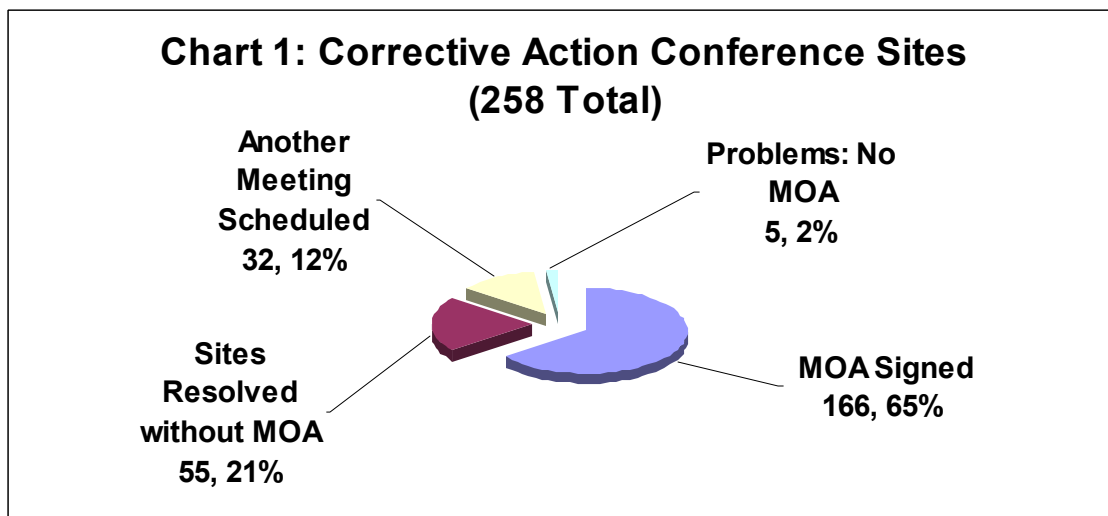
The backlog of high risk sites requiring corrective action caused the UST Section and other stakeholders to devise the corrective action conference process to expedite corrective action planning, budgeting, and scheduling. We evaluate the success of the conferences after one full year of implementation.

Background

In July 2004, the UST Section and stakeholders conducted a Kaizen event to examine the process by which corrective action is planned and implemented. The team recommended instituting a system whereby all interested parties of a high risk site participate in one or two conferences to reach a consensus on a corrective action alternative, a budget, and a schedule of events. Upon consensus, all parties sign a memorandum of agreement (MOA) outlining the activities, who will pay for them, and when they will occur. The Kaizen group set a goal of achieving 100 MOAs within the first year.

Data On Conferences

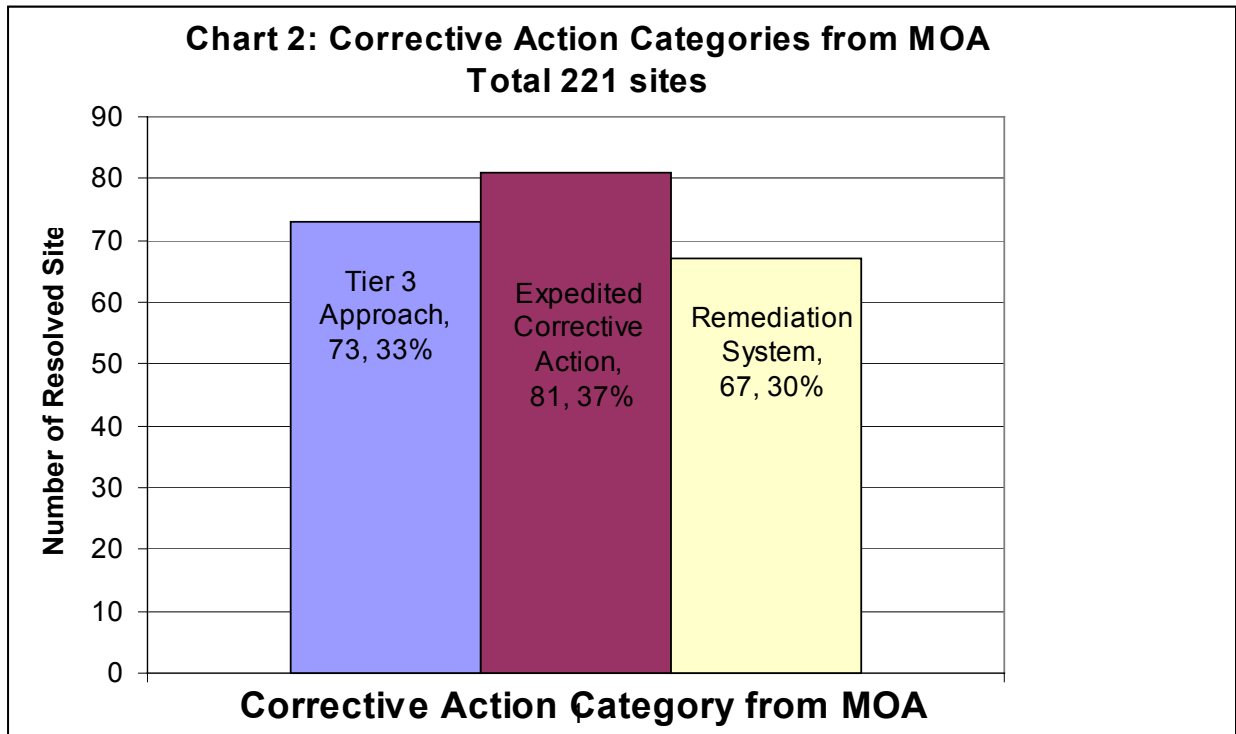
We conducted the first conference on July 23, 2004. By September 15, 2005, staff had facilitated 385 conferences covering 266 sites. We regularized the conference scheduling in September 2004, so data are presented for September 2004 through August 2005.



A total of 258 sites were included in the conferences during this time period. One hundred sixty six sites (65%) produced a signed MOA. Fifty-five relatively simple sites (21%) were resolved without needing an MOA. Thirty two sites (12%) are still awaiting the second meeting. For five sites (2%), no MOA could be reached and no further meetings are scheduled at this time.

Historic high risk sites are prioritized for scheduling based on high risk pathways as determined by Tier 2 evaluations: groundwater ingestion (drinking water wells and plastic water lines), then groundwater/vapors and surface waters. The DNR also sets a conference date via Tier 2 acceptance letters, so new high risk sites are addressed quickly.

There are approximately 400 to 420 more high risk sites that will need corrective action conferences. In addition, an average of three to four sites are added to the high risk list each month. Currently, more than 70 conferences are scheduled for the upcoming months.



Of the 221 sites that have MOAs or have been resolved without them, seventy-three (33%) will be addressed using a Tier 3 approach such as remodeling or documenting steady/declining plume; eighty-one (37%) will undergo expedited corrective action such as plastic water line replacement or over-excavation; and sixty-seven (30%) will receive a remediation system such as soil vapor extraction. (See Chart 2).

Assessment of Conferences

Based upon the goals set up by the 2004 Kaizen event, the corrective action conferences have achieved a tremendous success.

- 221 sites have been guided toward and into corrective action.
- 9 sites have been reclassified to low risk or no action required following one or more conferences.
- Submittals and acceptances of corrective action design reports (CADRs) have more than doubled, compared to previous years (see Chart 3).

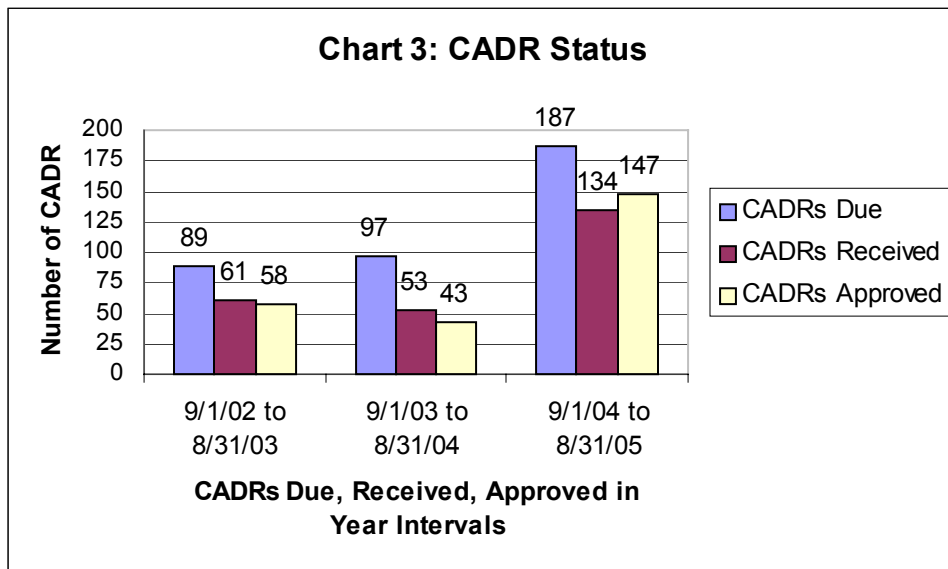


Chart 3 shows the number of CADRs due, submitted, and accepted September to August for 2002 to 2003; 2003 to 2004; and 2004 to 2005. The data indicate that the numbers of CADR submittals and approvals more than doubled after the conferences came into regular use.

Problems

While the conference process has, for the most part, been successful, we have encountered some problems.

- 15 of the sites needed more than two meetings to reach an agreement.
- 5 sites are on hold with no further meetings planned because the participants could not agree on a corrective action option and/or could not resolve funding issues.
- Staff of the UST Section must spend a significant amount of their time preparing for these conferences, participating in them, and writing the MOAs.
- As more sites/conferences are scheduled, staff have less time to follow up on schedules and activities set in previous conferences.
- Some groundwater professionals are commenting that they cannot keep up with the pace of the conference scheduling and the subsequent corrective action activities.
- The DNR must reschedule many conferences, primarily because the groundwater professionals cannot meet the schedules.

Suggestions for the Conferences

Although the fast pace of the conference schedules exerts pressure on the DNR, groundwater professionals, and the Fund, the UST Section recommends that the momentum be maintained so that the backlog of high risk sites needing corrective action can be eliminated.

A full-time staff person is required in the UST Section to schedule, track, facilitate, and maintain data on the corrective action conferences. Funding for a Corrective Action Specialist to perform these duties was obtained from EPA and a full-time facilitator started in 2005, but that grant runs out at the end of January 2006 and additional EPA funding is not likely. If the corrective action conferences are to continue with the present momentum, additional personnel will be needed after January 2006.