

## Evaluation of Corrective Action Conferences

Underground Storage Tank Section  
March 2, 2007

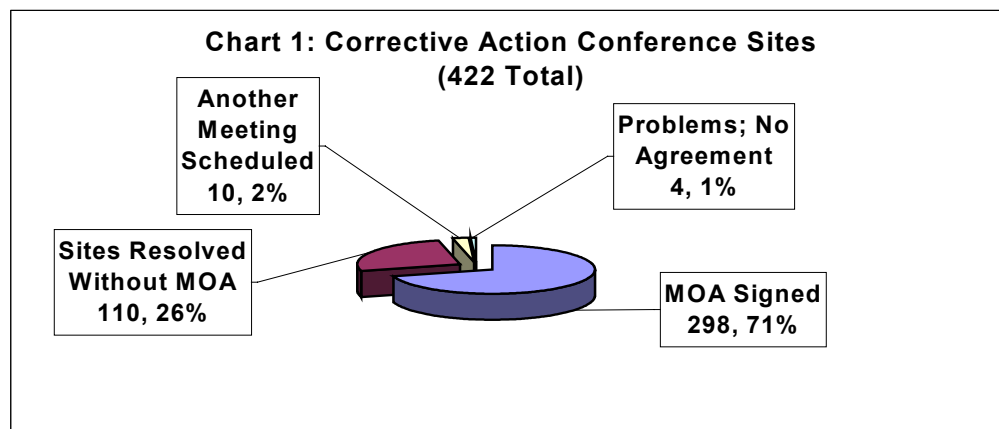
In 2004, the backlog of high risk sites in need of corrective action prompted the UST Section and other stakeholders to devise a corrective action conference process to expedite corrective action planning, budgeting, and scheduling. After approximately 2.5 years of implementation, the success of the conferences is evaluated and the data are presented with this summary.

### 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.

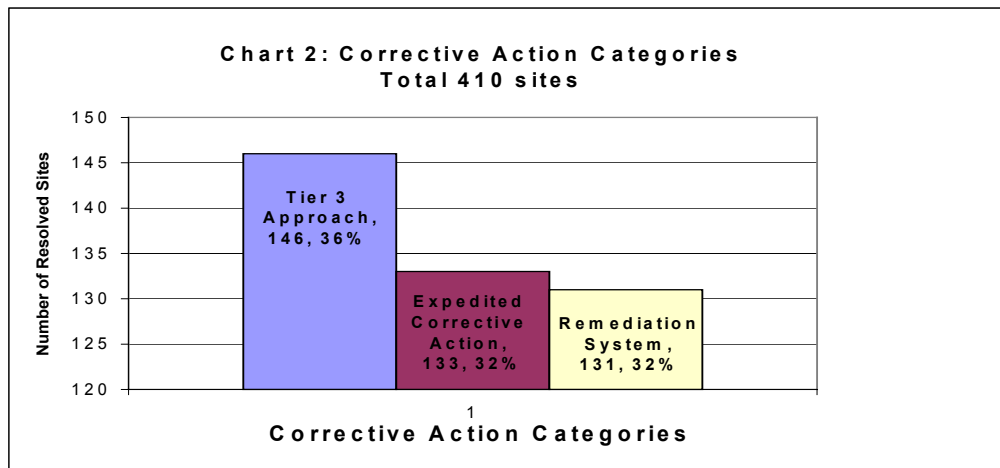
### Data On Conferences

We conducted the first conference on July 23, 2004. By January 1, 2007 staff had facilitated 673 conferences covering 422 sites. Data are presented for July 2004 through December 2006.



A total of 422 sites were included in the conferences during this time period. Signed MOAs were completed on two hundred and ninety-eight sites (71%). One hundred ten sites (26%) were resolved without needing an MOA. Ten sites (2%) are still awaiting an additional meeting. For four sites (1%), either no agreement could be reached and no further meetings are scheduled, or the work at the site stopped because of lack of funding.

Between 200 and 350 high risk sites will likely need corrective action conferences, including sites where the remediation strategy may need re-evaluation. The total number of high risk sites continues to decline over time. Twenty-nine conferences are scheduled for the upcoming months.



Of the 410 sites that have MOAs or have been resolved without them, 146 (36%) have been or will be addressed using a Tier 3 approach such as sampling or documenting steady/declining plume; 133 (32%) have or will undergo expedited corrective action such as plastic water line replacement or over-excavation; and 131 (32%) will undergo remediation 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 been exceedingly successful in the last 2.5 years:

- 410 sites have been guided toward and into corrective action.
- 34 sites have been reclassified to low risk or no action required after conducting the corrective action(s) set forth in corrective action conferences.
- Holding the corrective action conferences has quick-started the corrective action process for numerous high risk sites.

### Problems

While the conference process has, for the most part, been successful, some obstacles have been encountered:

- 49 of the sites needed more than two meetings to reach an agreement.
- 4 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.
- UST Section staff must spend a significant amount of time preparing for these conferences, participating in them, and writing the MOAs.

### Changes in Conferences

- Some conferences are now scheduled to address changes in remediation systems, monitoring plans, or proposed closure sampling.
- Some conferences have been held for low risk sites to guide them toward no action required.
- Fewer conferences are scheduled. An average of 27 conferences per month were held in 2005; 18 per month in 2006; and 13 per month for January and February of 2007.
- Changes in UST Section staffing have reduced the number of staff available to review Tier 2 reports and participate in the meetings.
- The backlog of high risk LUST sites in need of corrective action has been reduced significantly. However, many of the sites yet to be addressed generally have problems such as recalcitrant responsible parties, funding problems, legal problems, or other complex issues.