Florida Department of Environmental Protection
Division of Waste Management

Significant Changes to the Petroleum Restoration Program

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Change...
A few words about change…

• “If you don’t change direction, you will end up where you are heading”. Lao Tzu (500BC).

• “There is nothing permanent but change”. Heraclitus (500BC)

• “Change before you have to”. Jack Welch (1990s).
Yes, it has been a stormy year
We’ve been busy with some changes...

- ATCs.
- MFMP.
- SOWs.
- New Rules.
- Personnel Changes.
- Processes.
- Metrification.

To name a few!!!
So, where is the PRP headed?

- Metrification.
- Robust managed-risk approach.
- Robust MNA program.
- Robust reliance on PBCs.
- Must meet strategic plan objectives.
Measure several elements of the program:

- Discharge/Facility closures/year.
- Discharge/Facility assessments/year.
- Discharge duration in any one phase vs. a reasonable timeline.
- Are design performance standards being met?
- Are document review times being met?
- Is the contractor consistently meeting deadlines?

**Intervention by site managers and team leaders when necessary.**
Robust Managed-Risk Approach

Must rely on:

• Source reduction - when cost effective and in Statute!

• A coherent approach that relies on several elements: is discharge located in:
  • A delineated area for EDB, nitrate?
  • Within the right of way of a state road?
  • Within a municipal service area with restrictions on water well installations?
  • A vulnerable aquifer (saltwater-intruded)?

If yes, then offer closure with conditions without a restrictive covenant.
Robust Monitored Natural Attenuation Approach

Must rely on:

• **Data! Data! Data!**

• And an approach that relies on several elements. Is the plume:

  • Making progress? Is it stalled? Why?
  • What do the MNA indicators tell us?
  • What have we learned after >$100M spent on sites in MNA to date?

**Limbo should not be an option! Could we induce nature to finish the job? Yes. Refer to July memo on this issue**
We can’t rely on an old funding model of payment for services rendered when we have such a huge backlog.

- **PBC has a place in the tool box.**
  - Less administrative burden for the program.
  - We pay for performance.
  - Better lifecycle cost controls.

- **If the discharge conditions are amenable to PBC, then**
  - Program may approach ATC to enter into one.
  - May bundle discharges into a large Invitation to Bid.

Advantage to an ATC: the PBC amount is not part of the RCI calculation.
Must meet Strategic Plan
Objectives

• 500 discharges closed.
• 600 discharges assessed.
• $20M in force for Remedial Action.
• $15 in PBC contracts.
• 400 discharges in LSSI
Thank you. Questions?