

# Florida Department of Environmental Protection

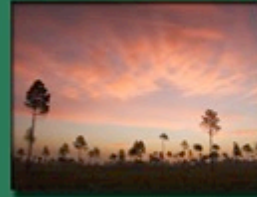
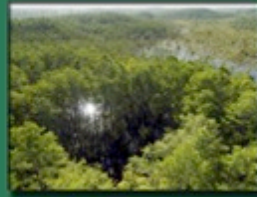


Division of Waste Management

## Significant Changes to the Petroleum Restoration Program

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July 2014



# 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.





# Metrification?

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**



# Robust Reliance on PBCs

**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



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**Thank you.  
Questions?**

