REGION 4 APPROACH TO ACHIEVE SWRAU

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FY 2018 SWRAU Targets

- National Increased from 40 to 51.
- Region 4 Increased from 5 to 9
ICs Implementation

- ICs are the biggest impediment to achieving SWRAU
- Must be cited in ROD
- Required for all remedies where UU/UE are not attained

  ▪ Types include:
    ▪ Restrictive Covenants, Uniform Environmental Covenants (UECA’s), Environmental Easements
    ▪ Zoning, County/City Ordinances, GW Use Well Installation Permits, Building Permits, Base Master Plans
    ▪ Consent Decrees and UAOs
    ▪ Deed Notices
Sanford Gas- Fl (Before)
Sanford During
Sanford Gasification after
Environmental Covenants

Advantages
• Describe exact restrictions needed
• Runs with the land (transfers to new owners)
• Enforceable by EPA, local authorities, or others

Disadvantages
• All parties have to agree (can’t force someone)
• Prior interests (i.e., mortgage) – foreclosure on property can void the Environmental Covenant

❖ Not practical if there are numerous parcels (separate Environmental Covenants for each)
EPA early engagement strategies with local officials

Discuss what you are trying to accomplish with local officials

- Local officials are readily accessible
- They are sympathetic with our concerns – don’t want citizens exposed or remedies damaged
- Local Board Meeting – ask for time on agenda
- Determine what local government CAN DO
  - Permitting restrictions: agree not to issue bldg. permits in capped/impacted areas
  - Coordinate with EPA/State prior to issuing well drilling permits
Camilla Wood - After
Camilla Wood – Ga (Before)