



Streamlined Permitting in Arizona

Robin Thomas, PE

ADEQ Solid & Hazardous Waste Section

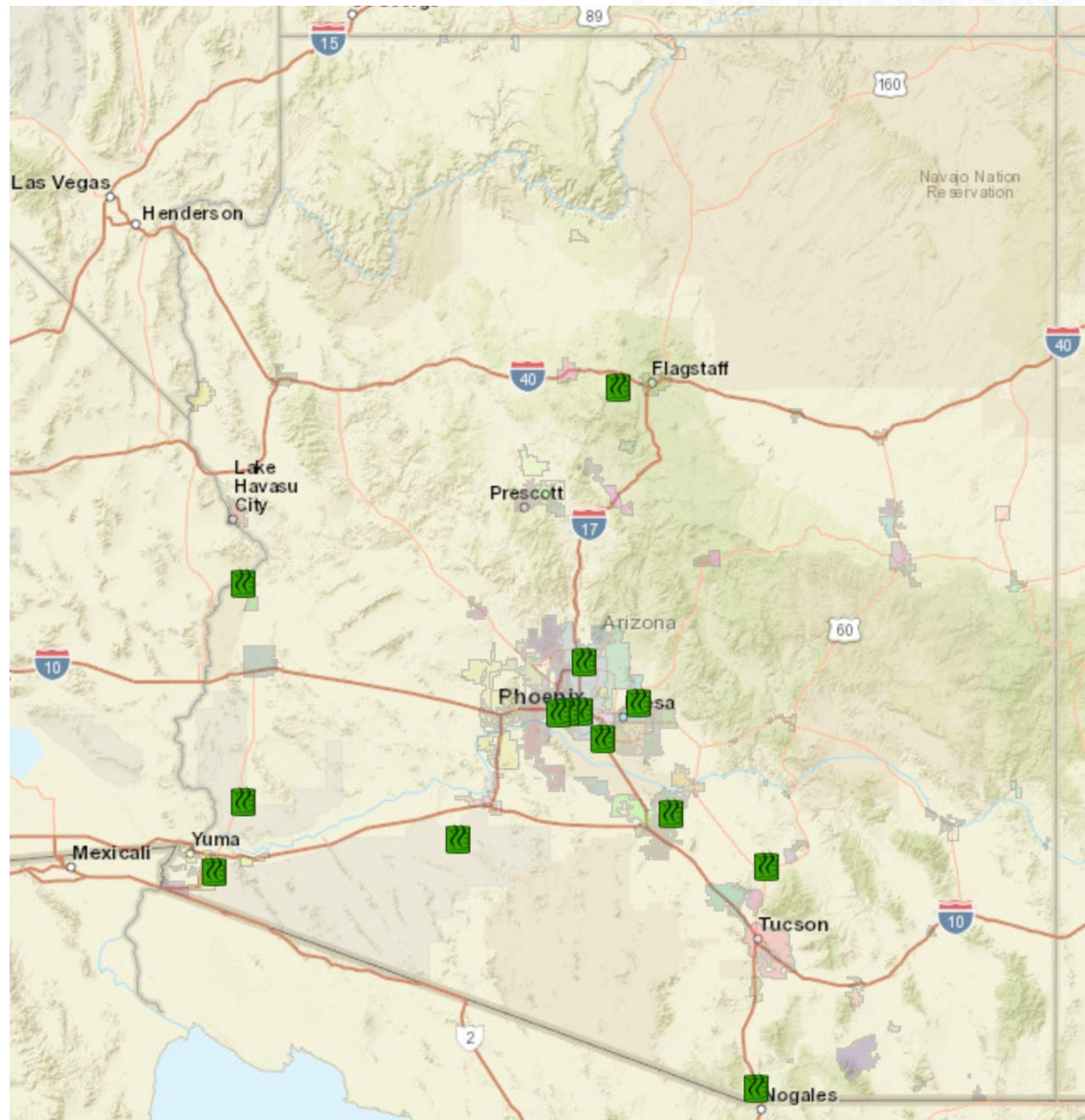
August 13, 2019



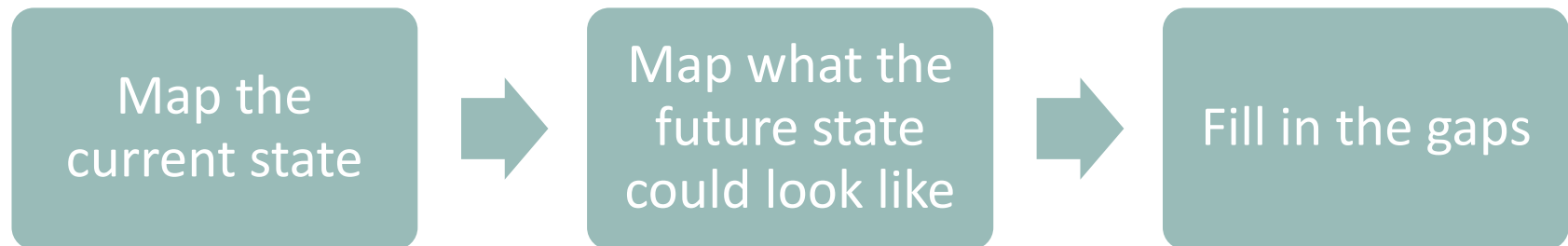
13 Treatment, Storage and Disposal Facilities

A mix of:

- Commercial
- Military
- State Land and University
- Container/Tank
- Subpart X
- Post-Closure
- Corrective Action

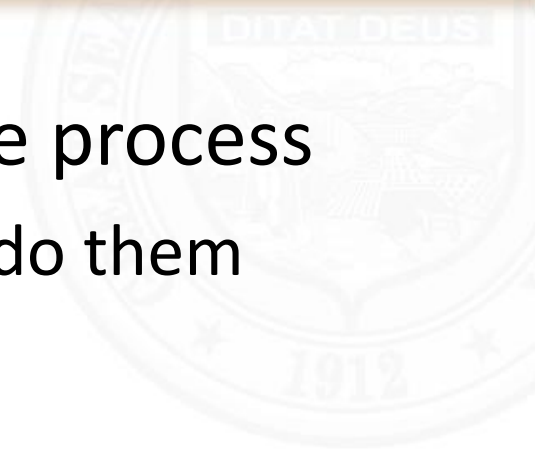


- Typical hazardous waste permit renewal: 24 - 36 months
- New goal: 180 days
- How do we get there?



- Early customer involvement
 - Pre-application meeting
 - Set expectations and schedule
 - How communications and comments will be handled
 - Share checklists and guidance
 - Set future meetings to review technical comments
- Limited use of formal Notice of Deficiency
- Keep key stakeholders and managers in the loop
- Management support at all levels
 - Overall commitment to the process
 - Prioritization of permit work
 - System for escalating and resolving disagreements

- Standard work for every step in the process
 - What are the steps and how do you do them
 - What rules and guidance do you use
- Create templates
 - Letters
 - Meeting agendas
 - Checklists
- Team effort

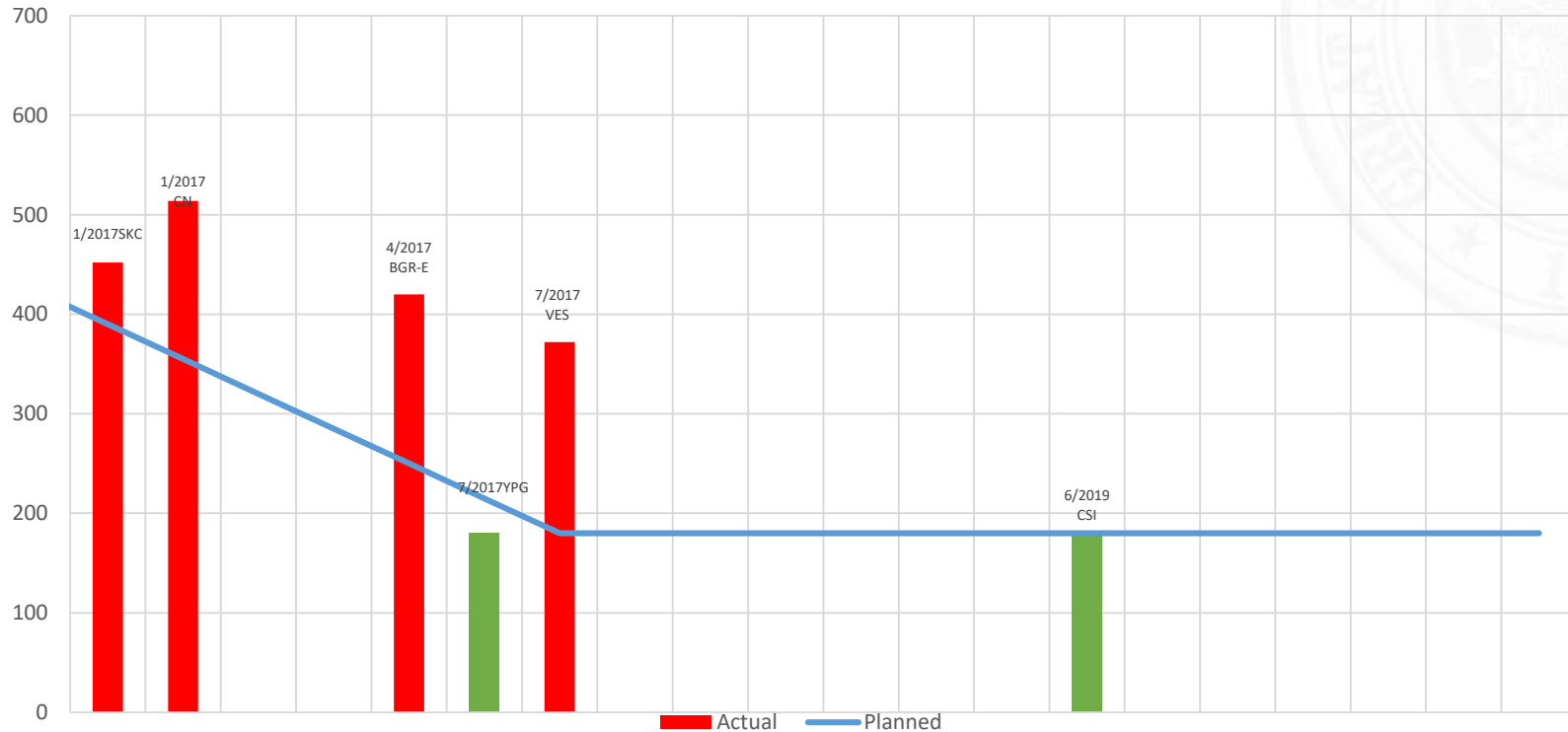


- Customer response time
 - “What’s the hurry?”
 - They are already operating
 - Post-closure and corrective action
- Lots of public comments
- Not much time for review of draft documents by customer and EPA



Results and Next Steps

Permit Lead Time (days)



- Revisit and revise our standard work
- Find or create better tools for technical review

Thank you

Robin Thomas, PE
Senior Engineer, Waste Programs Division
thomas.robin@azdeq.gov
602.771.4159

