Streamlined Permitting in Arizona

Robin Thomas, PE
ADEQ Solid & Hazardous Waste Section
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Arizona’s TSDF Universe

13 Treatment, Storage and Disposal Facilities

A mix of:

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

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

Map the current state  ➔ Map what the future state could look like  ➔ Fill in the gaps
Communications

- 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
Standardize

- 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
Challenges

- 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

- 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