

Strategic Planning

A Roadmap for Affecting Positive Environmental Policy Changes



James D. Hirsch, F&H Consulting, LLC

Simply put, strategic planning determines where an organization is going over the next year or more, how it's going to get there and how it'll know if it got there. Strategic planning should take into account that the world is unpredictable.

Planning for unpredictability is essential in our industry because funding for the Florida Department of Environmental Protection (FDEP) administered Petroleum Cleanup Program (CP) changes every year. These cleanups are paid by existing industry taxes that annually replenish the Inland Protection Trust Fund (IPTF), which exists solely for remediation of petroleum-impacted sites. However, some or all of this money has been used as a source of revenue to help replace state budget shortfalls during tough economic periods.

The CP is responsible for protecting our drinking water, cleaning up petroleum impacted properties so that they remain viable business assets, and providing employment to thousands of marketers, consultants, contractors and support personnel. The Environmental Committee (Committee) is developing both long-term and short-term plans to help ensure that these goals continue to be met.

Long-term plan

Over the next three to five years the Committee plans to focus its energy and resources to implement and affect change in the following areas.

Communication and consensus building

One of our top goals is to achieve clear and constant communication between the marketers, members, other industry

organizations and FDEP. Achieving and maintaining this goal will ensure that our actions represent the collective goals of FPMA. This will also promote consensus building within the industry that is critical for successfully advocating on issues important to FPMA.

Securing a constant level of cleanup program funding

Our goal is to cleanup all eligible sites as expeditiously as possible so that future IPTF funding may not be needed. To meet this goal we are developing plans to secure constant and adequate funding over multiple years. The data clearly shows that constant and increased funding equals more clean sites faster, protection of our drinking water and the generation of jobs.

Improving cleanup program procedures

The Committee is working with other organizations and FDEP to improve the cleanup process through the following types of activities:

- Expanding the Low Scored Site Initiative (LSSI) to remove clean sites from the CP.
- Improving Long Term Natural Attenuation Monitoring (LTNAM) so sites that are not cleaned in a reasonable amount of time naturally can be remediated expeditiously with one or a few episodic treatments.
- Reworking Performance Based Cleanup (PBC) guidelines to make this cleanup tool more attractive to site owners and consultants.
- Evaluating and categorizing all eligible sites to determine the cleanup

potential and risk at each site (i.e., bucket approach). This information can then be used to determine how to best distribute and spend cleanup funds, and to measure CP progress.

Short-term plan

Over the next six to 12 months the Committee plans to focus its energy and resources in the following areas:

- During the legislative session, the Committee will be in constant contact with members to ensure that environmental issues important to FPMA receive the appropriate amount of energy and advocacy.
- A significant state budget shortfall has been predicated for 2012. As a result, it can be expected that the IPTF will be looked upon as a source of revenue to make up budget deficits. The Committee and other industry organizations are working diligently to maintain, at a minimum, the current level of funding.
- Expanding the Low Scored Site Initiative (LSSI).
- Removing the required deductible for all Abandoned Tanks Restoration Program (ATRP) sites.
- Reviewing proposed FDEP changes to the CP's Standard Operating Procedures (SOPs). The changes are expected to be come out in February 2012. ○

James D. Hirsch, M.S., P.G is principal hydrogeologist/owner of F&H Consulting, LLC, and is also the chairman of the FPMA Environmental Committee. Contact Jamie at james.hirsch@fandhc.com or 352.214.0903.