

**Framework Document
Work Plan**

PRIORITY	TOPIC	ISSUES/QUESTIONS	RESOURCES/ ACTIONS NEEDED	LEAD
1	Karst Geology	<p>a. Background statistics need to be gathered: How much increased land development has occurred in the State particularly in urban areas? How many landfills in karst areas? Number of sinkholes? etc. What other statistics are needed? How to gather this info?</p> <p>b. Identification and discussion of other issues that may have an effect on karst geology challenges.</p> <p>c. How to address management of stormwater by local/state government?</p> <p>d. Characterization of groundwater flow systems in karst geology.</p> <p>e. EHB New Hope decisions and their effects.</p> <p>f. Revisit zone of influence in quarry mining.</p> <p>g. Risk management and its interpretation as it relates to karst geology.</p> <p>h. Overall approach to involving all stakeholders—who are they? what are their roles? how to get them involved?</p> <p>i. Consideration of insurance for general public.</p> <p>j. DCNR involvement in this issue.</p>	<ul style="list-style-type: none"> ▪ White paper, peer reviewed on karst. ▪ Karst related statistical information ▪ Identification of karst and groundwater movement experts to evaluate the current process and suggest appropriate approaches. ▪ Latest peer-reviewed studies regarding karst interpretations ▪ DCNR experts’ presentation on karst geology. ▪ Discussion of technologies currently being used and not being used and why ▪ Latest modeling efforts and assessments of those models. ▪ DEP Water program involvement. ▪ DEP website changes, role of social media. 	Establish working group.

		<p>k. Educating the public, legislature, lawyers and EHB judges.</p> <p>l. Modeling potential karst challenges.</p> <p>m. DEP cause and effect with respect to mining being cause of all sinkholes.</p>		
2	Management of Noncoal Program	<p>a. Discussion of chain-of-command process.</p> <p>b. Process for compliance policies to become active in district mining offices.</p> <p>c. Identify efficient process for development of staff resources and process for annual review of program.</p> <p>d. “Scorecard” for permit reviewers? What would be criteria?</p> <p>d. Education and training for DEP personnel new to noncoal—process, what’s needed, avoidance of Federal duplication, avoidance of coal regs in noncoal, assistance from industry.</p> <p>e. Communication to DEP personnel and industry.</p>	<ul style="list-style-type: none"> ▪Potential revisions to TGDs or SOPs ▪Evaluation of existing training programs. ▪Survey to DEP personnel and industry as to what they think is needed for training. 	RLT Committee
3	Expedited Review of Permit Applications	<p>a. Identify what would be needed to make this approach work.</p> <p>b. Identify any legal challenges with this approach.</p> <p>c. Explore other states’ approaches and challenges to expediting permit application reviews.</p>	<ul style="list-style-type: none"> ▪Need outside legal interpretation on DEP’s ability to do this. ▪Application forms changes ▪TGD changes 	RLT Committee

		<p>d. Explore the financial challenges and limitations of this with respect to DEP. How does this relate to PDG? (See next item below.)</p> <p>e. Use of third party for expedited review. How would this work?</p> <p>f. Communication to DEP personnel, industry and consultants.</p>		
4	Acceptance of PE/PG Stamp on Permit Application Modules	<p>a. Explore limitations and challenges of professional stamp management.</p> <p>b. Identify other states that utilize this approach and explore how it could be adapted to PA.</p> <p>c. Identify areas of permit applications or permits where this could be applied. (Example, Ch. 102, erosion and sedimentation.)</p> <p>d. Are current professional standards enforced? Penalties sufficient?</p> <p>e. Other agencies' approaches with the Commonwealth and other Department's approaches.</p> <p>f. Communication methods to DEP staff, industry and consultants.</p>	<ul style="list-style-type: none"> ▪Review State Registration Board for Professional Engineers, Land Surveyors and Geologists laws, regulations, penalties, and fees. Request statistics on violations, misconduct, penalties, etc. ▪Potential revisions to TGD, permit applications and engineering manual. ▪Invite PA Department of State, Bureau of Professional and Occupational Affairs representative to discuss process and management of Board. 	RLT Committee
5	Transparency of Information used in Permit Application Review	<p>a. What specific information can be used in review of permit applications according to the statute and regs?</p> <p>b. How to characterize use of personal professional unbiased experience in permit reviews?</p>	<ul style="list-style-type: none"> ▪potential revisions to TGDs 	RLT Committee

		c. Communication to reviewers, industry and consultants.		
6	Permit Fee Payment and PDG	a. Evaluate current PDG process, revise process to address failure to meet PDG. b. Address workarounds and process to elevate issues. c. Address financial consequences for failure to issue permits—how? d. Address exceptions—what are they? Develop basic criteria. What is process?	•TGDs changes	RLT Committee
7	Annual Report and Permit Fee Index	a. Develop outline of report including timeframes, need review by RLT Committee before recommending to full Aggregate Advisory Board. b. Are there changes needed to tracking systems to obtain required information? c. Look at other states' reports. d. Agree to a baseline of noncoal personnel required to run the noncoal program. e. Process and timing to review report annually with Aggregate Advisory Board. f. Determine appropriate indices and calculation for annual fee update.		Bill Allen, Josie Gaskey
8	Site Inspections (Inspections in excess of statutory/regulatory framework)	a. Process for greater efficiency in conducting the inspections. b. Internal criteria, reports regarding benchmarks for inspections? c. Tracking system? d. Evaluate administration fees and actual cost of inspections.	▪CAT data to determine actual cost of inspections.	RLT Committee

9	Consultant Qualification	<p>a. What does this process look like and include?</p> <p>b. Other agencies' approaches within the Commonwealth.</p> <p>c. Input from consultants.</p> <p>d. Determine any legal challenges.</p> <p>e. Are there other businesses that utilize this approach? What are the challenges/advantages?</p> <p>f. What changes need to be made within DEP for this to happen?</p> <p>g. Develop qualification criteria.</p> <p>h. Process to keep this kept updated?</p> <p>i. Communication to DEP personnel, industry and consultants.</p>	<ul style="list-style-type: none"> ▪Evaluate other agencies' programs, determine pros and cons and which parts of their programs would work for DEP. ▪Identify current top 10 challenges with permit applications submitted. 	RLT Committee
10	Full-Cost Bonding and Bond Release	<p>a. Full-cost bonding implementation.</p> <p>b. Determine roles of groups outside of DEP, their process in handling bond releases, and their influence on overall timing.</p> <p>c. Discussion of "double bonding."</p> <p>d. Define criteria for bond release.</p> <p>e. Identify challenges with keeping within the criteria: general timeframe, exceptions, progress tracking, etc.</p> <p>f. Process for exception reporting.</p> <p>g. Determine if DEP has ability to track efficiently. If not, what is needed?</p>	<ul style="list-style-type: none"> •potential changes to TGD or policies 	RLT Committee