

APPENDIX A

UPDATES AND REVISIONS TO THE MRBCA TECHNICAL GUIDANCE

The department seeks to maintain a viable, relevant, and effective Missouri Risk-Based Corrective Action (MRBCA) process with the flexibility necessary to meet changing environmental conditions and regulations. In addition, we expect that department staff and users of this guidance will identify areas of needed improvement over time. This appendix provides a framework for updating this guidance. Changes in the guidance will also be reflected in changes to the associated risk-based rules to the extent necessary to implement changes in the guidance. We envision three kinds of updates.

The first type of update addresses errors, omissions, clarifications or corrections to this guidance that do not involve substantive issues. These kinds of changes will be made as determined to be necessary by the Department of Natural Resources and as quickly as possible. We anticipate these changes to be handled by means of an “Errata Notice” that can be inserted into the document and that will be posted on the MRBCA web site maintained by the department.

The second type of update would be more substantive technical or policy issues that interpret or build upon the current technical guidance. As long as the change did not conflict with existing laws and regulations, substantive changes will be made through the use of Technical and Policy Memoranda that will be posted on the MRBCA web site.

The third type of update will encompass a complete review that responds to changes in scientific knowledge, improved methodologies, and new and better information. Every three years, the department will initiate this systematic review and evaluation of this guidance. The first complete review and evaluation will begin three years from the date of final publication of this guidance. It should be staggered with any review of the risk-based corrective action guidance that covers the petroleum storage tanks so that the reviews are not on going in the same time period. Any changes made in the guidance will need to be conducted in accordance with any required regulatory procedures.

The review will be done through a public participation process and in concert with a stakeholder group that, at a minimum, is comprised of relevant federal, state and local agencies, regulated entities and their representatives, and interested citizens. The review planning process will identify and plan for areas of responsibility, a timeline for completion, quality control procedures, and a publication mechanism.