

# How Does a Regulator Review Your Report?

And Why Do Regulators  
Want a CSM?

# Reviewing Reports

- Start with site history
- Then focus on the data
  - appendices
  - tables and maps
  - graphs help – but often not included
- Develop own CSM
- Then Conclusions/Recommendations
  - are they compatible with CSM developed by regulator?

# Report Problems

- Data doesn't support conclusions
- Significant data gaps
- Only some data used (and some ignored)
- Lots of data – but:
  - it is not analyzed – what does it mean?
  - not presented clearly – need tables, maps and graphs

# Report Problems continued

- Report doesn't explain WHY things were (and were not) done
  - leaves the regulator with too many questions
- Off-site conditions not addressed
  - need to discuss receptors!
- Difficult to determine how/where consultant and regulator disagree
- Report does not address all the requirements in the state regulations

# Benefits of a CSM

- Data gaps managed
- Data is analyzed and presented well
- Reasoning is Explained
  - a key to better reports!
  - many potential questions are answered
- Receptor evaluation is integral
- Conclusions are based on the data

## Benefits of a CSM Continued

- If Consultant and Regulator CSMs don't agree - can identify where disagreements are
- Makes correspondence more efficient
- Conversation in plain English – easier for everybody (including your client) to understand

# Benefits of a CSM Continued

- Improved Quality of Site Characterization
  - Field effort better planned
  - Fewer data gaps
  - Better Decisions
- Improved Quality of Reports
  - Fewer state comments to address
  - Less time and money
  - Overall stakeholder confidence enhanced
  - Less skepticism about quality of work

# Conclusion

- States are frustrated by poor report quality
  - significant resources are spent writing lengthy comment letters and other correspondence
  - these resources could be more efficiently used to move other projects
- Use the conceptual site model approach – it benefits all of us!