The Writing Perspective from a State Regulator

Ronald J. Wallace, PG, CPG
Georgia Department of Natural Resources
Environmental Protection Division
Underground Storage Tank Management Program



New Hirer Process

- Written example based on a question given
- Given 15 minutes to complete
- Is considered a part of the interview process
- After the face to face interview is completed the written example is reviewed

New Employee

- The manager will review all correspondence for a period of time
- There will also be staff personnel that the new employee can reach out for help
- There can be a large volume of required communication between the state regulatory program and the responsible party or third parties
- Need to be careful in both formal letters and emails

Types of Letters

- Most letters are templates but there is basic information that has to be inserted:
 - Date
 - Name (responsible party)
 - Address
 - Document you are referencing (what was submitted to the state)
 - Who is copied internal and external
 - Who officially signs letter

More Complex Letters

- Not all letters fit into a normal template
- Typical comments are suggestions or deficiencies in a report
- Need to be very precise in what you as the regulator are asking
- Make sure remarks do not contradict something else in the letter
- On most occasions there is sufficient time to complete a letter so care can be taken to check:
 - Spelling
 - Grammar
 - Punctuation

Guidance Documents, Memos, and Standard Operator Procedures

- Guidance documents are written procedures on how an investigation is to be conducted, what to include, and format of the report
- Memos are generally internal updating a project to management
- Standard operating procedures may be for internal or external use
 - How to install a monitoring well
 - How to collect a groundwater sample
 - Sampling rivers and streams
 - Proper routing of reports

Common Errors

- Use a new template letter each time so you don't have to cut and paste
- Spell check but even that can cause errors
- Review noun and verb combination
- Be careful with short, choppy sentences
- Be careful in repeating something you have written or using the same wording multiple times
- Be careful in giving events in chronological order
- Read everything after you think you are complete

Common Problems

- Void the word "recommend" when requesting additional work
- Use precise language and maps as needed
- If you verbally communicate with a consultant, follow up with a letter
- Informational comments to correct a consultant's oversight
- Show acronym after the words are written out

Email Issues

- Some of the same issues are in emails
- Need to be careful to write precise sentences
- Don't use slang
- If you are replying to a question, answer the question and then end it
- Don't try to be cute or funny
- Emails may be part of a legal record, so be serious



Richard E. Dunn, Director

Land Protection Branch 4244 International Fadovay Satis 104 Atlanta, Georgia 20254 404-280-2827

March 3, 2017

Mr. Bruce Coyle Paulding County 240 Constitution Blvd. Dallas, GA 30132

SUBJECT: Corrective Action Plan (CAP)-Part B Review Comments:

Former Sheriff's Office 329 Johnston Street Dallas, Paulding County, GA Facility ID: 9110051*1

Dear Mr. Coyle:

The Georgia Underground Storage Tank Management Program (USTMP) has received your consultant's letter, dated February 17, 2017, that forwarded a properly certified Monitoring Only Report. The report was prepared by Mill Creek Environmental, LLC.

We have conducted a technical review of the Monitoring Only Report. The basis for this review is the Georgia Rules for Underground Storage Tank Management (GUST Rules, revised 2001). Our comments are outlined in the enclosure. Please submit the next semi-annual Monitoring Report by September 1, 2017.

If you have any questions, please contact me at (404) 362-2589.

Sincerely,

Ronald J. Wallace Program Manager Corrective Action Unit II

RJW:

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EPD Review Comments

Corrective Action Plan (CAP)-Part B: Former Sheriff's Office 329 Johnston Street Dallas, Paulding County, GA Facility ID: 9110051*1

March 3, 2017

The recurrence of free product needs to be evaluated. A long term high vacuum
event may finally remove the product and reach final closure.



Richard E. Dunn, Director

Land Protection Branch 4244 International Farkway Sate 104 Adminis, Georgia 20254 404-200-2527

April 13, 2017

Mr. Derick Wolf Columbus Housing Authority 1000 Wynnton Road Columbus, GA 31902

SUBJECT: Corrective Action Plan (CAP)-Part B No Further Action Required: Columbus Housing Authority 1000 Wynnton Road Columbus, Muscogee County, GA Facility ID: 9106008*1

Dear Mr. Wolf:

The Georgia Underground Storage Tank Management Program (USTMP) has received your consultant's letter, dated March 28, 2017, that forwarded a properly certified Progress Report. The report was prepared by Geotechnical and Environmental Consultants, Inc.

Based on current requirements of the Georgia Underground Storage Tank Act, the Georgia Rules for Underground Storage Tank Management (GUST Rules) and the data submitted, the USTMP has determined that no further action is required for the referenced release.

However, further corrective action may be required if mandated through more stringent State or Federal statutory or regulatory changes. Additional measures may also be required if existing or future drinking water systems or surface water bodies within two miles of the site are impacted by any dissolved contamination resulting from this release, or if previously unidentified soil contamination, dissolved contamination or free großigg are identified as originating from this site.

Please submit a Completion Report and Certification, documenting that the associated monitoring wells have been properly abandoned, by June 15, 2017. If you have any technical questions, please contact me at (404) 362-2589.

Sincerely,

Ronald J. Wallace Program Manager Corrective Action Unit II

RJW:

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How Do You Improve

- Reach out to your manager and staff
- Ask to see letters others have written
- There are many books and help on-line when it comes to writing
- "The Elements of Style" by William Strunk, Jr. and E. B. White
- For students still in college:
 - Take a technical writing class
 - More classes now require written reports. Take these seriously
 - Do a senior project that requires a written report
 - Reach out to your professors for help