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
March 3, 2017

Mr. Bruce Coley
Paulding County
236 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: 9110001

Dear Mr. Coley:

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 (GUSTR), revised 2011. 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) 540-2239.

Sincerely,

Ronald J. Wallace
Program Manager
Corrective Action Unit II

Enclosure

cc: with EPD comments: Dan Centofanti, P.G., Mill Creek Environmental, LLC
File (CA): Paulding, 9110001
Mr. Derick Wolf
Columbus Housing Authority
1000 Wyman Road
Columbus, GA 31902

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

April 13, 2017

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 new or 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 product, 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) 342-2159.

Sincerely,

Ronald J. Wallace
Program Manager
Corrective Action Unit II

cc: Kevin K. Strungler, P.G., GEC, Inc.
FMC (CA): Muscogee, 9106008
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