



REMEDIATION AND REDEVELOPMENT DIVISION POLICY AND PROCEDURE

RRD-16 – TECHNICAL ASSISTANCE AND PROGRAM SUPPORT TEAMS PROCEDURE

Effective Date: August 23, 2022

ISSUE

The Remediation and Redevelopment Division (RRD) reviews work plans and reports submitted to the division. The review typically includes evaluation of highly technical and scientific concepts to guide decisions to ensure protection of public health, safety, welfare, and the environment. The RRD has implemented a peer review process, *Remediation and Redevelopment Division Policy and Procedure RRD-15, Peer Review Procedure*, which is a deliberative process conducted at the District Office or section level where a Project Manager's professional peers assist in rendering the division's determination on a work plan or report submitted to that office. At times, the input of division Technical Assistance and Program Support (TAPS) teams is needed to complete the analysis of the merits of the document under review from a technical, regulatory, and policy perspective.

The purpose of this procedure is to describe the TAPS Teams' purpose and functions, and the processes for organizing and operating them as a resource for RRD and EGLE staff.

AUTHORITY

Part 201, Part 213, and Part 196, Clean Michigan Initiative Implementation, of NREPA, the Brownfield Redevelopment Financing (Act 381), and the Comprehensive Environmental Response, Compensation, and Liability Act provide the department the general authority to review submittals. Sections 20114b, 20114d, 20118(1), 21308a, and 21315 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, provide the department the authority to review the adequacy of work plans and reports submitted under the Part 201 and Part 213 programs. There is no prescribed method in Part 201 and Part 213 to accomplish this task.

DEFINITIONS

TAPS: Technical Assistance and Program Support

TAPS Team Recommendation: Formal documentation of the recommendation or technical advice based on subject area technical experience and knowledge, established guidance, or direction consistent with statute, rule, policy, and procedure.

POLICY

The TAPS Team review is intended to be an assessment of a specific technical or policy issue guided by current scientific advances, best practices, commonly accepted standards, pertinent statutory requirements, and policies. Some sites may require reviews from multiple TAPS Teams depending on site conditions. The TAPS Team review is generally intended to be guidance to inform decisions made on a document. However, there are circumstances where the TAPS Team has the technical and regulatory knowledge required to assess the situation, and/or to determine what is appropriate for the conditions. These circumstances will be included in the standard operating procedures developed for each TAPS Team and are listed under Links to Additional Information in this document. In accordance with RRD-15, in an instance where there is a dispute with a TAPS Team recommended action, the Peer Review decision maker will engage with division executive management. Although not required, there may be times when stakeholder participation in the TAPS Team review process may be necessary, appropriate, or requested by the submitter and the merit of the involvement should be evaluated by the project manager and supervisor prior to scheduling a TAPS review.

The overall responsibilities of the TAPS Teams include:

1. Providing technical, regulatory, policy, and procedural knowledge for the subject matter of the TAPS Team.
2. Providing recommendations concerning technical matters based on current science, including best practices.
3. Mentoring RRD staff to facilitate their professional development.
4. Developing recommendations to the RRD Management Team on policy and procedures.
5. Identifying necessary training for staff or the regulated community relevant to each team's area of expertise.
6. Fostering an atmosphere for open and productive technical and regulatory dialogue with staff and the regulated community.
7. Raising technical and policy issues, as necessary, for further review by the RRD Management Team.
8. Compiling and maintaining technical decision documentation for ease of referencing the decisions and to provide technical input to the RRD Management Team for future policy development.

Technical and Program Support Areas

The current TAPS Teams that review work products that are frequently encountered and encompass many technical and program support issues are:

1. Baseline Environmental Assessments/Due Care
2. Groundwater Modeling

3. Groundwater – Surface Water Interface
4. In-Situ Remediation
5. Incremental Sampling

6. Institutional Controls
7. Non-Aqueous Phase Liquids
8. Soil Background
9. Vapor Intrusion

There are also specialists in the Compliance and Enforcement Section, Field Operations Section, and the Toxicology Unit who are tasked with providing legal or technical expertise. Staff in those sections or units may also participate in the TAPS Teams identified above.

TAPS Teams

Additional TAPS Teams may be developed or TAPS Teams may be restructured or eliminated based on need at the discretion of RRD executive management, on the basis of future technical and program support needs of the division.

- RRD executive management will identify specific technical and program support staff who serve as permanent members on each team.
- A team of RRD staff, and staff from other divisions as appropriate, will be assembled to fulfill the objectives for each technical and program support area.
- Each team is required to establish standard operating procedures that include:
 - Identifying circumstances that require review for guidance or direction.
 - Establishing expected levels of review (e.g., guidance, direction, technical advice, specific questions, assistance with policy, etc.), and the breadth of team member involvement (e.g., full team member participation versus one team member answering questions) appropriate for the technical and program support area.
 - Establishing the information necessary to be available for the team to review for adequacy.
 - Establishing the nature of documentation (e.g., email or inter-departmental memo) required to record the technical advice provided by the group.
 - Identifying and establishing key positions. Positions may be administrative such as the team leader, technical including the technical leader, support, or general membership in function. If the RRD Management Team has established a subject matter specialist pertinent to the team's technical focus, or appoints a subject matter specialist, that person shall serve as a standing member of the team providing technical leadership.
 - Establishing how many TAPS Team members are required. The number of members will be based upon the overall RRD workload utilizing that area of specialization. For example, a technical issue that commonly arises at many sites statewide may require representation from every district and other units as opposed to a technical issue that occurs infrequently. Inter-divisional representation will be sought for teams with technical issues that span more than one division's programs.

- Establishing a mentoring program for all new members including training, education, consulting, and a review of team resource materials including the team standard operating procedure.
- Establishing a process to maintain the TAPS Team SharePoint page, including monthly updates to keep agenda, review documents and decision information current and a review of the page content at a minimum of every six months.

The RRD will follow the procedures detailed below to maintain staffing of the TAPS Teams and maintain TAPS Teams SharePoint pages to disseminate information.

PROCEDURE

Table 1. TAPS Teams Members

Step	Who	Does What
1.	TAPS Team Member (or District Supervisor or Unit Manager)	Notify TAPS Team Leader, TAPS Team Coordinator, and District Supervisor or Unit Manager (as applicable) of resignation from the TAPS Team.
2.	District Supervisor and Unit Manager	Notify program staff of opportunities for participation in TAPS Teams based on unscheduled vacancy in representation on the team.
3.	Program Staff	Contact District Supervisor or Unit Manager to express interest in participation of selected TAPS Team (technical staff are limited to participation in two TAPS Teams at the same time).
4.	District Supervisors and Unit Managers	Nominate technical staff person(s) to identified TAPS Team(s) of interest based upon vacancy. Notify the applicable Field Operations Manager (FOM) or Section Manager, and the TAPS Team Coordinator.
5.	FOM, Section Manager and TAPS Team Coordinator	Applicable FOM, Section Manager, and the TAPS Team Coordinator concur with nomination and TAPS Team Coordinator appoints staff person to identified TAPS Team. If nomination is not approved, TAPS Team Coordinator notifies the applicable District Supervisor or Unit Manager.
6.	TAPS Team Coordinator	Notify applicable District Supervisor or Unit Manager, TAPS Team Leader and technical staff person of appointment to TAPS Team.
7.	TAPS Team Leaders	Provide notice to their TAPS Team of new technical staff appointment. Updates TAPS Team member list.
8.	Assistant Division Director	Annually review TAPS Team membership, leadership, need for additional guidance or teams, or need for restructuring or elimination of teams.

Table 2. TAPS Team SharePoint Team Pages

Step	Who	Does What
1.	TAPS Team Leaders	Update membership lists on Teams SharePoint pages
2.	TAPS Team Leaders and members	Maintain Teams SharePoint pages to include: <ul style="list-style-type: none"> • Standard Operating Procedure • Links to forms for review • Links to associated model documents • Technical decision documentation
3.	TAPS Team Leaders and members	Maintain links to appropriate information, guidance, policy and procedures.

APPROVING AUTHORITY



Mike Neller, Director
 Remediation and Redevelopment Division

HISTORY

Table 3. Historical Changes

Policy No.	Action	Date	Title
RRD-16	Original Effective Date	9/24/ 2012	TAPS Teams
RRD-16	Revised	10/5/2012	TAPS Teams
RRD-16	Revised	9/1/2020	Technical Assistance and Program Support Team Procedure
RRD-16	Revised	8/23/2022	Technical Assistance and Program Support Team Procedure

LINKS TO ADDITIONAL INFORMATION

[Baseline Environmental Assessment & Due Care TAPS Team \(RRD-16 SOP-1\)](#)

[Groundwater Modeling TAPS Team \(RRD-16 SOP-2\)](#)

[Institutional Controls TAPS Team \(RRD-16 SOP-3\)](#)

[In Situ Remediation TAPS Team \(RRD-16 SOP-4\)](#)

[Incremental Sampling TAPS Team \(RRD-16 SOP-5\)](#)

[Non-Aqueous Phase Liquid TAPS Team \(RRD-16 SOP-6\)](#)

[Groundwater Surface Water Interface TAPS Team \(RRD-16 SOP-7\)](#)

[Soil Background TAPS Team \(RRD-16 SOP-8\)](#)

[Vapor Intrusion TAPS Team \(RRD-16 SOP-9\)](#)

CONTACT / UPDATE RESPONSIBILITY

Any questions or concerns regarding this policy and procedure should be directed to EGLE-RRD@Michigan.gov.

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