Independent Peer Review Process for Technical Support to the Post Oak Savannah Groundwater Conservation District

INTRODUCTION

The Post Oak Savannah Groundwater Conservation District ("the District") has requested that INTERA, Incorporated ("INTERA") develop a program to provide an independent peer review of select technical work products delivered by INTERA to the District. This document contains a proposed protocol for this independent peer review program.

GENERAL DETAILS

INTERA employee Steve Young currently serves as the District's consulting hydrogeologist and, in such capacity, he regularly provides technical support to the district related to preparation of groundwater availability model (GAM) predictive simulations, reviews of permit applications, establishment of District groundwater monitoring programs, development of Protective Drawdown Limits (PDLs), joint planning and development of Desired Future Conditions (DFCs), and assurance of compliance with the PDLs and DFCs. Dr. Young works with several other INTERA employees that provide technical services to POSGCD. Among these employees are Jevon Harding, Tingting Yan, Toya Jones, Clark Griffith, and Neil Deeds. During the last two years, Jevon Harding has been actively involved with joint planning, developing a plan for monitoring and demonstrating PDL and DFC compliance, and the groundwater assistance program or GWAP.

The District has expressed interest in developing an independent peer-review program to provide an independent review of select work products provided by either Dr. Young or Ms. Harding to the District.

INDEPENDENT PEER-REVIEW PROCESS

The purpose for the independent peer review process is to provide a systematic review of key INTERA deliverables in a timely and cost-effective manner that will maintain standards of quality and enhance credibility. The independent peer-review process will insure that the technical work meets three criteria: (1) it is based on reasonable assumptions; (2) the data selection is appropriate; and (3) good science was used to perform the analysis and evidence of verification shall be documented and provided on all applicable work submitted to the district. The program will include two types of review: INTERA Initiated and DISTRICT Initiated.

The independent peer review process will be led by an INTERA employee who is an expert in hydrology and works independently of Dr. Steve Young and Ms. Jevon Harding. The independent peer reviewer will have access to the data, software programs, computer files, and personnel that were used to deliver products to the District. Also, the independent peer reviewer will have access to all INTERA personnel and may ask Dr. Young or Ms. Harding for assistance in the independent peer review process if necessary.

INTERA Initiated Independent Peer Review

INTERA initiated independent peer reviews will be performed automatically for deliverables that directly affect the development and implementation of groundwater rules and policies. Deliverables that will undergo an INTERA initiated review are called "Level 1" deliverables. Level 1 deliverables will be appropriately designated by the District when they are tasked to INTERA. Examples of these kinds of deliverables are:

- Proposed modifications to the district's monitoring program
- Evaluation of monitoring results
- Evaluation of PDL and DFC compliance

After a Level 1 deliverable has been completed, INTERA will notify the District general manager (GM) that the deliverable will be independently peer-reviewed, and shall include a schedule and estimate of cost to perform the independent review. If the independent peer reviewer finds that the deliverable is deficient, the reviewer will work with Dr. Young and Ms. Harding to resolve the deficiency. If the independent peer reviewer has concerns with the resolution of the deficiency, the reviewer will contact the District GM to discuss options for moving the review forward. In these instances the GM shall be advised of any changes to the original schedule and costs associated with these efforts. All Level 1 deliverables will be accompanied by a letter that documents the process followed in the independent peer review.

District Initiated Peer Review

District Initiated peer reviews are initiated by the GM of the District. The GM may request a peer review in writing that includes instructions and could include one or more of the following:

- A specific description of the work product to be reviewed
- Copies of the specific work product to be reviewed
- The purpose of the review and the deliverables
- Schedule and budget

Upon receipt of the general manager's request, the peer reviewer will provide the District GM with a schedule and estimate of cost for completing the work and the reviewer will coordinate the peer review with Dr. Young and Ms. Harding. If the peer reviewer finds that the deliverable is deficient, the reviewer will work with the Dr. Young and Ms. Harding to resolve the deficiency. If the peer reviewer has concerns with the resolution of the deficiency, the reviewer will contact the District GM to discuss options for moving the review forward. A District-Initiated Peer Review process may involve other products besides those generated by INTERA. The requirement of documenting the peer-review process will be project dependent. Among the materials/documents that could undergo a District Initiated review process are the following.

- Well operation permits
- INTERA or POSGCD Presentations

- Model simulations
- Products developed by GMA 12, neighboring GCDs, or POSGCD
- Additional items as determined by the GM

