2 YEAR PLAN

Permitting Enhancement Work Plan

The Permitting Enhancement Work Plan is a comprehensive roadmap to guide efforts to improve The Department of Toxic Substances Control's ability to issue protective, timely and enforceable permits using more transparent standards and consistent procedures.

The mission of the Department of Toxic Substances Control is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products.

Revised Apr 22 2015

EXECUTIVE SUMMARY

The Department of Toxic Substances Control (DTSC) understands and acknowledges that providing clarity and instilling confidence in its permitting process is of paramount importance to our mission. The issuance of permits for the management of hazardous waste at treatment, storage and disposal facilities is a fundamental regulatory activity performed by DTSC. This work plan is the latest milepost in our reform effort to strengthen our hazardous waste facilities permitting program to be more protective and timely, while enhancing enforcement and using more transparent standards and consistent procedures.

The Permitting Enhancement Work Plan (PEWP) goes beyond serving as a response to public concerns about our process. It is the Department's comprehensive roadmap for implementing its broader vision of a more effective, protective and equitable permitting system.

Ten reform goals are identified, along with the basis for selecting each goal. Strategies and desired outcomes are outlined, along with deliverables needed to achieve them.

WORK PLAN GOALS

- **Define processes that will reduce permit processing times whenever feasible while maintaining quality and protectiveness:** Develop a detailed permitting process flow chart; decrease technical review time to 13 months for 90 percent of permits; and reduce permit processing time to an average of two years.

- **Establish clear permitting performance metrics:** Ensure consistency and accountability by developing a clear organizational and management structure; creating a clear peer review system; customizing project management tools; ensuring supervisor signoff on key process milestones; and requiring employee expectation memos.

- **Standardize the technical review process materials and vocabulary used to review, approve or deny applications or permit modifications:** Create model documents, templates and a searchable online library for permitting staff; and evaluate and revise guidance to clarify what actions are taken if an application is repeatedly incomplete or insufficient.

- **Coordinate intra-departmental support during the permitting process:** Determine a process and clear triggers when permitting should involve other Department units, including Legal Counsel, Planning and Environmental Assessment (CEQA), Enforcement and Public Participation.

- **Update permitting standards to increase protections for human health and the environment:** Update permitting standards to enhance transparency, reduce processing timelines and require state-of-the-art equipment to improve safety of the surrounding community; write guidelines articulating standards for revoking or denying a permit; and revise protocols for calculating financial assurance to ensure adequate resources for protecting human health and the environment.

- **Enhancing enforcement:** Develop and implement an intra-departmental accountability process to ensure permits clearly and consistently incorporate permitting requirements and enhance enforcement.

EXECUTIVE SUMMARY

- **Inform public of progress in processing permits:** Increase transparency by devising and publishing online a quarterly summary of permit activity at each facility statewide.

- **Identify and address Environmental Justice concerns early in permitting actions:** Promote earlier and greater focus on identifying and addressing environmental justice concerns; create an environmental assessment and engagement process; and better involve communities so they can understand and effectively participate in DTSC's permit decision making.

- **Develop and maintain staff capacity:** Create and implement a training and mentoring plan to ensure permitting staff are knowledgeable on current processes and procedures.

- **Address data management needs:** Improve data management system to facilitate project management, improve performance metrics reporting, promote information sharing and enhance accountability.

The Work Plan is Part Two of Three Phases to Strengthen DTSC's Hazardous Waste Management Program

For several years, DTSC's efforts to carry out its mission in some of its programs have been compromised by deficiencies in administrative and technical processes and practices. During the past three years, DTSC has made it a priority to identify and address foundational issues that threaten DTSC's ability to achieve its mission. In early 2012, DTSC launched an initiative called "Fixing the Foundation." With this initiative, DTSC commenced an exhaustive process to repair its operations in three phases.

First, DTSC resolved its structural budget, fixed its personnel system and created a more effective organizational structure. The next step – and the basis of this work plan – is to create processes and systems to ensure effective programs and accountability. To this end, DTSC contracted with an independent consulting firm, California Personnel Services (CPS) HR Consulting, which in October 2013 made several recommendations that would create significant upgrades to the DTSC permitting process. In Phase Three, DTSC will ensure long-term excellence by identifying needed regulatory or legislative changes. The Department also will address long-term funding issues for permitting, enforcement and cleanup.

Conclusion

Improving the protectiveness, timeliness and effectiveness of the DTSC's hazardous waste management program is a continual process. The Department must act to keep pace with our evolving understanding of threats to human health and the environment from hazardous wastes. DTSC also must address risks from new hazardous waste facilities and safeguard the public by requiring state-of-the-art technology. This work plan provides a critical link to help DTSC move forward and modernize its permitting process.

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SECOND STRATEGY TO HELP ACHIEVE GOAL: Evaluate Process Activities to Reduce Process Times Whenever Feasible, While Maintaining Quality and Protectiveness.

OUTCOMES: Reduce technical review time to 13 months for 90 percent of permits and decrease total permit processing time to an average of two years

GOAL 2: **ESTABLISH CLEAR PERMITTING PERFORMANCE METRICS**

STRATEGY TO HELP ACHIEVE GOAL: Establish Clear Structure for Enhancing Accountability

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FIRST STRATEGY TO HELP ACHIEVE GOAL: Create and apply systematic definitions to key terms and aspects of the permitting process.

OUTCOME: Create a searchable on-line library linked to key permitting documents that uses a standardized vocabulary.

SECOND STRATEGY TO HELP ACHIEVE GOAL: Maintain consistency and the application of clear standards to help expedite permitting decisions and ensure protectiveness.

OUTCOME: Create a Technical Advisory Group, management-headed clarification process, and protocols for permit writers that help maintain consistency and overcome obstacles to expediting the permit process and maintaining protectiveness.

GOAL 4: **COORDINATE INTRA-DEPARTMENTAL SUPPORT DURING THE PERMITTING PROCESS**

STRATEGY TO HELP ACHIEVE GOAL: Develop a procedure establishing triggers for involving other DTSC programs in the permitting process.

OUTCOME: Clear and consistent coordination process between DTSC staff.

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STRATEGY TO HELP ACHIEVE GOAL: Create and better articulate standards for enhancing protections for public health and the environment in permitting decisions.

SUMMARY OF GOALS, STRATEGIES, AND OUTCOMES

OUTCOME: Develop and clarify standards and processes for making key permit determinations on approving, denying, revoking or modifying a permit or permit application and updating financial assurance requirements.

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OUTCOME: Develop a process of accountability to consistently ensure the early application of permitting requirements.

GOAL 7:   **INFORM PUBLIC OF PROGRESS IN PROCESSING PERMITS**

STRATEGY TO HELP ACHIEVE GOAL: Expand the information DTSC regularly provides to the public about the department's permitting decisions.

OUTCOME: Publish Quarterly Summary of permit activity at each facility and provide tools for DTSC and the public to track progress on permitting actions.

GOAL 8:   **IDENTIFY AND ADDRESS ENVIRONMENTAL JUSTICE CONCERNS EARLY IN PERMITTING PROCESS**

STRATEGY TO HELP ACHIEVE GOAL: Create an EJ assessment and engagement process to identify environmental concerns early in the permitting process and better involve communities so they can understand and effectively participate in DTSC's decision making for permit applications.

OUTCOME: Early environmental assessment and action to help address concerns and enhance the public confidence in the protectiveness of the permit process and increase public understanding and participation in this process.

GOAL 9:   **DEVELOP AND MAINTAIN STAFF CAPACITY**

STRATEGY TO HELP ACHIEVE GOAL: Develop and implement a staff-training plan to ensure permitting staff are knowledgeable on current processes and procedures.

OUTCOME: Enhanced staff training on all work requirements and ensure staff are kept aware of new standards and requirements.

GOAL 10: **ADDRESS DATA MANAGEMENT NEEDS**

STRATEGY TO HELP ACHIEVE GOAL: Address data management issues basis for approach.

OUTCOME: Improved data management system that effectively facilitates project management and improves performance metrics reporting.

GOAL 1: DEFINE PROCESSES THAT WILL REDUCE PERMIT PROCESSING TIMES WHENEVER FEASIBLE WHILE MAINTAINING QUALITY AND PROTECTIVENESS

FIRST STRATEGY TO HELP ACHIEVE GOAL: Develop a new, detailed permitting process flow chart.

OUTCOMES: Clear and complete written and graphic summary of the permitting process.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.b**: Improve efforts to ensure hazardous waste permits are protective, timely, legally defensible, and enforceable.

- **CPS RECOMMENDATION 5-1:** Adopt a revised process flow chart for permitting.

- **CPS FINDING**: *Lengthy and potentially preventable delays occur due to a lack of standard process and a failure to include all processing requirements in a predictable, standard order that is identified and shared with relevant permitting staff.*

Action	Deliverable	Target Completion
1	Develop a PROCESS FLOW CHART of the current DTSC permitting process. Using the current process develop a revised flow chart so that it is a comprehensive overview of each significant step in the permitting process, including: • Create in EnviroStor a project management timeline signed by permit writer and supervisor. • Reduce and eliminate "grey areas" in process. • Include new processes to identify EJ environmental concerns and enhance public engagement. Also include coordination with CEQA and Public Participation much earlier in the permitting process.	6/30/14
2	Develop a Process Flow Chart "COMPANION DOCUMENT" to include in the Permit Writer's Manual that: • Identifies typical obstacles and alternative approaches to help resolve such obstacles at various points in the permitting process. • Reference specific instructions, templates and other documents contained within the Permit Writer's Manual that may be applicable at various points in permitting process: o Develop guidance to identify when reference documents need to be updated (e.g. changes in	6/30/16

Action	Deliverable	Target Completion
	law or policy, new type of regulated industry or waste, etc...).	
	o Identify individuals who are responsible for updating, modifying and adding guidance documents.	
	o Update or develop guidance materials to support the Technical Review process flow. This should include clear and written decision-making criteria associated with each section, and processing check sheets to match the process steps on the Part B flowchart. California statutes and regulations, as well as U.S. EPA materials should be used as a reference, if applicable. Include policies, guidance or decision documents developed to document decisions resolving contentious issues, disputes and lack of certainty in the statutes and regulations.	
	o Develop a complete standard Part B Permit Application model document with robust guidance and instructions to permit applicants establishing minimum content and quality standards for each section.	
	o Develop policy or regulation requirement that all permit applications must comply with the model document format and met the minimum content standards or be rejected.	
	o Develop guidance that the permit writer should utilize when conducting an initial review of the technical components of the application to determine whether the technical portions of the application are complete before the substantive Technical Review of the application begins. The permit writer must prepare a cover sheet to identify whether the initial application is complete, e.g., prepare a checklist	
	o Update and utilize Appendix A of the Permit Writer's Manual for Storage and Treatment Facilities (a 177 page Permit Completion Checklist for Part B of a full RCRA permit) for guidance on Technical Review process document.	

SECOND STRATEGY TO HELP ACHIEVE GOAL: Evaluate permit process activities to reduce process times whenever feasible, while maintaining quality and protectiveness.

OUTCOMES: Reduce technical review time to 13 months for 90 percent of permits and decrease total permit processing time to an average of two years.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.f:** Establish clear priorities for the permitting program.

- **CPS RECOMMENDATION 5-2:** The Permitting Office should develop instructional and guidance materials to support the Technical Review process flow. This should include clear and written decision-making criteria associated with each Section, and processing check sheets to match the process steps on the Part B flowchart. The U.S. EPA materials should be used as a reference.

- **CPS FINDING:**
  - *The largest share of permitting time is taken in technical review, and that portion of the review process takes 2.7 years by itself and 63% of the total processing time. This is the greatest potential area for time improvement (page 78).*
  - *An average processing time of from 1.5 to 2.2 years should be achievable, and should be the goal of the California permitting program.*
  - *Permit Office leads and supervisors were unable to provide any formal, step-by-step guide, checklist, or other work aid to assist in Technical Review.*
  - *Employees clearly feel there are grey areas in all process segments, and that these are worst in Technical Review.*
  - *Employees do not feel the "tools and guidance" are current or "adequate…to enable me to do my job efficiently and effectively."*
  - *Employees do not feel "the required statutory and/or regulatory authorities used in permits are clearly understood by all."*

- **DTSC STATEMENT:** DTSC should have an average processing time of 2 years for a permit.

Action	Deliverable	Target Completion
3	Create a Permitting Technical Review Project Team that will define steps in the technical review process and define the process inputs and outputs. • Utilize appropriate data in EnviroStor and the CPS review to measure the technical review process inputs, set up and validate the data measurements system and determine the baseline for the percent of technical reviews that are currently being completed within 13 months.	3/24/14
4	Analyze the measured input data to determine which inputs are the sources of variation that have a significant impact on the technical review time.	4/30/14

Action	Deliverable	Target Completion
5	Identify and implement solutions to reduce the sources of variation, reduce the technical review time, and analyze new data to validate the improvement.	5/30/14
6	Implement controls to assure that the improved technical review time is maintained. Focus on creating a control plan with a sustaining and continuous improvement strategy.	7/15/14
7	Segregate permit types into categories based on a discrete characteristic (e.g. industrial classification code of the facility or complexity of technical review). For each category, define and scope the objective, identify the primary metric, identify the suppliers and customers, and define the process inputs and outputs. • Evaluate the impact of an applicant submitting a part B application more than 180 days prior to expiration of permit. • Evaluate the impact of all applicants submitting permit applications using mandatory standard Part B Permit Application format with defined minimum quality and content requirements. • Evaluate the impact of applicants in each defined category submitting applications using mandatory standard Part B Permit Applications customized to the specific facility category.	9/15/14
8	Measure the administrative and public review process inputs, create and validate the data measurement system and determine the baseline for administrative and public review processing times for each permit category.	10/15/14
9	Compare average proposed time period with CPS report hypotheses from an appropriate period of time.	10/30/14
10	If initial target time limits cannot be reasonably achieved, identify the appropriate targets for each permit category.	11/15/14
11	Upon director approval, implement revised review process. • Integrate recommendations from these efforts with updates to the permitting process flow chart (Goal 1 Action 1) and intra-departmental coordination (Goal 4 Action 1) and other efforts for director approval and subsequent roll out.	12/31/15[1]

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[1] Updated to reflect approach of integrating the changes from various work plan efforts for roll-out and implementation.

Action	Deliverable	Target Completion
12	Create a Technical Advisory Group (TAG) within the Permitting Program that contains experts from various disciplines who are tasked with using their expertise to identify and help address permitting roadblocks. • The decisions of the TAG should be integrated into the COMPANION DOCUMENT and be used in written guidance, best management practices and policy documents to help refine and strengthen the department's approach to permitting decisions. • The TAG should meet on a regular basis to discuss and resolve issues that are raised by the Project Managers. (See GOAL 3, Action 1).	5/31/2015[2]
13	Develop a process whereby permit writers who have encountered roadblocks in the permitting process can bring their issues before the Technical Advisory Group to reach a decision on how to move forward when a particular permit is stalled. • Decisions of the TAG should be memorialized in the DTSC SharePoint electronic library. • The TAG makes consensus recommendations on particular permit problems which are then implemented with management approval. If and when decisions are made that could apply more broadly, they should be documented in a decision memo and posted in the SharePoint library so that the decision can be considered and applied to similar problems in the future.	6/30/15[3]
14	As changes are made to the permitting process resulting from the implementation of actions contained in the Permitting Enhancement Work Plan, the detailed Permitting Process Flow chart should be revised to reflect those enhancements. The revised Flow Chart can then provide the basis for consideration of future enhancements to further improve the permitting process. Conduct a formal review of the permitting process flow to incorporate process enhancements.	6/30/16 10/31/15 (Flow chart review/ revision) [4]

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[2] The Technical Advisory Group was identified as a priority and accelerated to be formed and start functioning more than a year in advance of the original Work Plan target date of 6/30/2016.
[3] Similar to Goal 1 Action 12, this action was identified as a priority and accelerated from the original Work Plan target date of 3/15/2016.
[4] A formal review and revision of the permitting process flow is planned for fall 2015, after development of permitting enhancements. The new flow chart will reflect work plan-identified permitting enhancements.

GOAL 2: ESTABLISH CLEAR PERMITTING PERFORMANCE METRICS

STRATEGY TO HELP ACHIEVE GOAL: Establish a clear structure for enhancing accountability.

OUTCOME: Establish clear performance metrics for a consistent permitting process.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 1.a:** Implement sustainable solutions where all staff hold themselves and others accountable and encourage frank and open internal discussions at DTSC.

- **CPS RECOMMENDATION 1-1:** The Department must initiate supervisory confirmation of all milestone dates input into EnviroStor as a double-check to the current practice of independent project manager entry, to ensure accurate input that matches the operational record. This practice will also confirm supervisor awareness of the completion of key permit process milestones, and invite their intervention when prompt processing is delayed.

- **CPS RECOMMENDATION 2-1:** Formally articulate the objectives and purposes of the Permitting Program based on law, and ensure that these objectives are disseminated and understood by the permitting staff and the broader public. These objectives and purposes should specifically address three policy questions including: What constitutes a timely permitting action…?

- **CPS RECOMMENDATION 4-1:** DTSC should establish a clear and predictable organizational structure for permitting that is focused on in-person meetings, in-office work, and updated training. Telecommuting should be severely limited or revoked for at least a six-month period while these necessary improvements take place and the objectives and purposes in Recommendation 2-1 are implemented. All permit staff duty statements should be brought up-to date along with goals and performance appraisals during this period. Necessary updates to standard templates, work aids, and work processes should be achieved. Work units should use this time to build solid relationships with their supervisors. Maintaining traditional in-office work groups, with a supervisor at each location, will improve communication and assist with re-establishment of efficient processes and work production.

- **CPS RECOMMENDATION 5-4:** Future changes in management at the civil service level should be discouraged, to allow time for the recommendation of this report to be implemented and for leadership to be held accountable for those changes.

- **CPS RECOMMENDATION 5-6:** Immediately after completion of a charter, the project manager should develop and post a project plan for each renewal. The project plan should show all major tasks, and a timeline for completion for each. This project plan should be reviewed and approved by the supervisor and a team leader for that type of renewal.

- **CPS FINDING:**
  - *Appropriate management, work unit cohesiveness, and effective work organization has suffered for an extended period of time.*

  - *The lapse of sufficient program management has been a significant problem for permitting, which has only recently been corrected.*

Action	Deliverable	Target Completion
1	Review current supervisory structure to evaluate whether there is a clear reporting structure in place to ensure accountability of all staff. Update or modify current structure, including the project manager system, as necessary.	Completed April 2014[5] Ongoing
2	Permitting Office review all duty statements for Permitting staff. Update or modify duty statements, as necessary, to ensure roles and responsibilities are clearly defined. • Management should communicate any changes or additions to prior duty statements directly to affected staff.	7/15/14
3	Memorialize current Peer Review process to create written guidelines, including: • Description of deliverables that are reviewed. • Roles and responsibilities of Peer Reviewers. • Develop a checklist or form to allow Peer Reviewers to create an Administrative Record (e.g. Track what was reviewed, what standards were applied, etc.) For every peer reviewed Permitting deliverable. • The process should be implemented through an EnviroStor work request procedure.	12/31/14
4	Prepare a list of documents and other deliverables that require Permitting supervisor sign-off before other programs conduct their reviews. • Coordinate this list with input from each program involved (e.g. OLA, CEQA). • Work requests could be made pending in EnviroStor until the supervisor concurs with the request.	6/30/15
5	To ensure good project management. EnviroStor is to be used by the Permit Writer, in conjunction with the supervisor, at the beginning of the Permitting process to develop a project-specific management plan that identifies major tasks and sets a timeline for completion for each. As noted in Goal 1, through the development of the revised PROCESS FLOW CHART and its COMPANION DOCUMENT, additional accountability measures should be integrated into	12/31/14

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[5] Completed hiring of a supervisor to implement new reporting structure so that each permitting staff reports to a supervisor and there is a supervisor in each office. Implemented change from team structure to supervisory structure.

Action	Deliverable	Target Completion
	the project specific management plan, including: • Sign-off standards for key permitting process steps. • A process for making any alterations in the steps which includes tracking the dates of alteration (to track performance) and documentation of the justification for the change, where applicable. • Establish regular intervals to review the process.	
6	Review the existing checklist for the Administrative and Technical review phases to accomplish the following: • Modify or update to ensure clear and complete identification of each point of the process. • Ensure it includes necessary detail, including clear points in the Administrative and Technical Permitting Process to track the completion of all required phases of review. • Train staff on the updated checklist.	3/31/15
7	Permitting Office should write expectation memos for all staff. • Permitting Office should also update memos as necessary. • Permitting supervisors should reference expectation memos in annual performance evaluations.	9/30/14
8	Permitting supervisors should meet regularly (e.g. bi-weekly) with every staff member to discuss project status.	Completed[6] Ongoing
9	Permitting senior staff should meet regularly (e.g., bi-weekly) to coordinate on overall program issues and to help ensure consistency.	Completed[7] Ongoing
10	Participate in regular meetings with US EPA and report back to permitting staff and management: • National Permit Writer's Conference Call • US EPA Region 9 – DTSC Permit Section Managers meeting	Completed[8] Ongoing

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[6] Updated to reflect that supervisors are meeting with staff individually on a regular basis.
[7] Updated to reflect that supervisors and seniors are meeting bi-weekly with branch/division chief.
[8] Updated to reflect that Permitting is participating in regular meetings with U.S. EPA.

Action	Deliverable	Target Completion
	• GPRA Meeting.	

GOAL 3: STANDARDIZE THE TECHNICAL REVIEW PROCESS MATERIALS AND VOCABULARY USED TO REVIEW, APPROVE OR DENY APPLICATIONS OR PERMIT MODIFICATIONS

FIRST STRATEGY TO HELP ACHIEVE GOAL: Create and apply systematic definitions to key terms and aspects of the permitting process.

OUTCOME: Create a searchable on-line library linked to key permitting documents that uses a standardized vocabulary.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.b:** Improve efforts to ensure hazardous waste permits are protective, timely, legally defensible, and enforceable.

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.f:** Establish clear priorities for the permitting program.

- **CPS RECOMMENDATION 1-2:** Develop a network file including templates and samples of best-quality permitting work products, including model permits and a best practice call in letter, to support the adopted standard process.

- **CPS RECOMMENDATION 2-1:** Formally articulate the objectives and purposes of the Permitting Program based on law, and ensure that these objectives are disseminated and understood by the permitting staff and the broader public. These objectives and purposes should specifically address policy questions including: When and how the enforcement and required clean-up actions of recorded violations are adequately considered in permit renewal?

- **CPS RECOMMENDATION 5-2:** The Permitting Office should develop instructional and guidance materials to support the Technical Review process flow. This should include clear and written decision-making criteria associated with each Section, and processing check sheets to match the process steps on the Part B flowchart. The U.S. EPA materials should be used as a reference.

- **CPS RECOMMENDATION 5-7:** Develop a standard lexicon of terms regarding permit renewal actions, so terms such as Notice of Deficiency are not used during Administrative Review, and so that a common, standard process is consistently described in all departmental communication.

- **CPS FINDINGS:**
  - *Lack of a consistent process used for permit renewal.*
  - *There is not sufficient clarity in many critical standards for effective Permit Program operations.*
  - *Permit Office leads and supervisors were unable to provide any formal, step-by-step guide, checklist, or other work aid to assist in Technical Review.*
  - *Employees clearly feel there are grey areas in all process segments, and that these are worst in Technical Review.*
  - *Employees do not feel the "tools and guidance" are current or "adequate…to enable me to do my job efficiently and effectively."*

- o *Employees do not feel "the required statutory and/or regulatory authorities used in permits are clearly understood by all."*
- o *Employees feel that current management could better promote workflow with more clear and consistent direction and guidance.*

Action	Deliverable	Target Completion
1	Create a SharePoint site searchable library that contains all documents pertaining to the Permitting Program including, but not limited to, Permit Writer's manuals (two manuals exist for different types of facilities), Fact Sheets, templates, model documents, policies, procedures, checklists and links to all relevant information. The information must be up to date and organized in a logical and intuitive manner. (See GOAL 1, Actions 12 and 13.)	Completed 12/18/2014[9] Ongoing
2	Require Permitting staff to become familiar with the SharePoint site library contents and to regularly refer to and use the approved models, manuals, policies, procedures, templates and checklists.	Completed 12/18/2014[10] Ongoing
3	Identify a clear process to standardize terms and review and regularly update all documents, information and links on the SharePoint library site. This review should include all Permit Writer's manuals used. Determine if all are necessary and if so, determine if any guidelines should be created to ensure standard use of the manuals.	12/31/14
4	Revise Chapters 6 through 9 of the "Permit Writer's Manual for Storage and Treatment Facilities" pertaining to the two phases of the Technical Review process. Processes for disposal facilities should also be revised or updated, as necessary.	6/30/15
5	Amend Chapter 3 titled "Receive Application" of the Permit Writer's Manual to: • Evaluate whether to remove terminology pertaining to a "Notice of Deficiency," since that phrase should only be used when reviewing a permit's technical completeness. • Determine the location of Appendix 3.1 which is an "Administrative Completeness Review Checklist." DTSC records currently show this appendix is not available. • Revise the guidance in both of these documents to clarify the steps that Permitting staff should take when	6/30/15

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[9] Revised to reflect date that sharepoint knowledge repository database was presented to staff.
[10] Revised to reflect date that knowledge repository database was presented to staff.

Action	Deliverable	Target Completion
	the application is repeatedly incomplete or insufficient. • Improve the guidance by better articulating: o When the Activity Fee becomes due upon submission of a repeatedly insufficient application for a permit or permit modification. O When to inform the applicant about the fee, the amount of the fee and the applicant's right to enter into a reimbursement agreement.	
6	Revise the Permit Writer's Manual for Closure of Storage, Disposal and Treatment Facilities to discuss partial unit, full unit and full facility closures.	12/31/15
7	Prepare separate Permitting Staff checklists for partial unit, full unit and full facility closures.	12/31/15
8	Revise the Permit Writer's Manual and the Closure Manual to designate when courtesy notification of local government agencies is recommended in the permitting and closure process, and when corrective action is planned.	12/31/15

SECOND STRATEGY TO HELP ACHIEVE GOAL: Maintain consistency and the application of clear standards to help expedite permitting decisions and ensure protectiveness.

OUTCOME: Create a Technical Advisory Group, management-headed clarification process and protocols for permit writers' that help maintain consistency and overcome obstacles to expediting the permit process and maintaining protectiveness.

BASIS FOR APPROACH:

• **CPS RECOMMENDATION 2-1:** Formally articulate the objectives and purposes of the Permitting Program based on law, and ensure that these objectives are disseminated and understood by the permitting staff and the broader public. These objectives and purposes should specifically address policy questions including: When and how the enforcement and required clean-up actions of recorded violations are adequately considered in permit renewal?

• **CPS RECOMMENDATION 5-2:** The Permitting Office should develop instructional and guidance materials to support the Technical Review process flow. This should include clear and written decision-making criteria associated with each Section, and processing check sheets to match the process steps on the Part B flowchart. The U.S. EPA materials should be used as a reference.

• **CPS FINDINGS:**
  Lack of a consistent process used for permit renewal:
  o *There is not sufficient clarity in many critical standards for effective Permit Program operations.*

o *Permit Office leads and supervisors were unable to provide any formal, step-by-step guide, checklist, or other work aid to assist in Technical Review.*

o *Employees clearly feel there are grey areas in all process segments, and that these are worst in Technical Review.*

o *Employees do not feel the "tools and guidance" are current or "adequate…to enable me to do my job efficiently and effectively."*

o *Employees do not feel "the required statutory and/or regulatory authorities used in permits are clearly understood by all."*

o *Employees feel that current management could better promote workflow with more clear and consistent direction and guidance.*

Action	Deliverable	Target Completion
9	Create a Technical Advisory Group within the Permitting Program that contains experts from various disciplines who are tasked with using and updating the COMPANION DOCUMENT and who apply their expertise to identifying and helping to address permitting roadblocks. The decisions of the group should be integrated into the COMPANION DOCUMENT and be used in written guidance, best management practices and policy documents to help refine and strengthen the department's approach to permitting decisions.	See Goal 1 Action 12
10	Develop a process whereby permit writers who have encountered road blocks in the permitting process can bring their issues before the Technical Advisory Group to reach a decision on how to move forward when a particular permit is stalled. • The permit writer should conduct an initial cursory review of the technical components of the application to determine whether the technical portions of the application are complete before the substantive Technical Review of the application begins. • The permit writer must prepare a cover sheet to identify whether the initial application is complete (e.g. prepare a checklist). • Where needed, the Technical Advisory Group will make consensus recommendations to management to address permit problems with broad applicability[11].	See Goal 1 Action 13

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[11] Updated language to reflect Technical Advisory Group role in providing consensus recommendations on issues with broad applicability.

Action	Deliverable	Target Completion
11	Create written guidelines that reflect existing requirements and practices requiring permit writers to conduct early site visits. • The visit should confirm accuracy of site, facility and operational descriptions provided by Part B Application. The visit should help to define the scope of the permit, including items to be regulated under the permit. • This visit should be included in the revised permitting flow chart required in Goal No. 1. • Beta test the early site visit and develop a Champion within the Office of Permitting to serve as the technical lead for questions and guidance on the early site visit.	12/31/14 (guidelines) 6/30/15 (Beta test[12])

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[12] The early site visit protocol was identified for Beta testing, with associated revisions shown.

GOAL 4: COORDINATE INTRA-DEPARTMENTAL SUPPORT DURING THE PERMITTING PROCESS

STRATEGY TO HELP ACHIEVE GOAL: Develop a procedure establishing triggers for involving other DTSC programs in the permitting process

OUTCOME: Clear and consistent coordination process between DTSC staff.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 1.a:** Implement sustainable solutions where all staff hold themselves and others accountable and encourage frank and open internal discussions at DTSC.

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.b:** Improve efforts to ensure hazardous waste permits are protective [sic], legally defensible and enforceable.

- **CPS RECOMMENDATION 5-1:** *A defined and coordinated initial process review by DTSC CEQA staff and DTSC Community Involvement Staff, initial and regular/as needed consultation between enforcement and permitting.*

- **CPS FINDING:**
  - *A defined and coordinate [sic] initial process review by DTSC CEQA staff and DTSC community Involvement staff.*
  - Initial and regular/as needed consultation between enforcement and permitting.
  - *… [T]here was agreement that the lack of an adopted threat standard for permitting actions is also a significant inhibitor of one of the primary stakeholder criteria for the denial or revocation of a permit: "the presence of a clear, documented threat to public safety, human health, or environmental preservation."*

Action	Deliverable	Target Completion
1	Add to the Permit Writer's Manual a procedure establishing consistent and clear triggers that permitting will use to involve the following DTSC programs: • Office of Legal Affairs • CEQA Unit • Enforcement and Emergency Response • Brownfields and Environmental Restoration (including toxicology)[13]	6/30/15 Public Participation and Office of Communications: 12/31/15[14]

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[13] Toxicology and Geologic Services Unit are additional programs/ services for which procedures are being developed.

Action	Deliverable	Target Completion
	• Financial Responsibility • Geologic Services Unit • Public Participation and Community Relations • Office of Communications The Procedure should include the following: • A process for resolving disputes between the Permitting Office and the other DTSC program. • Identify situations when permit writers accompany inspectors on compliance inspections of permitted facility. • A process for work requests between Permitting Office and other DTSC program. The Procedure should correspond with the PROCESS FLOW CHART, when applicable.	
2	Identify experienced staff from the affected DTSC programs to be involved in the development of the Procedure.	9/30/14
3	Establish a process to ensure regular coordination and communication between Permitting Office and other programs on projects affecting both programs. • Refine coordination to help ensure effectiveness and train staff.	6/30/15
4	Develop training for implementation of intra-agency coordination.	12/31/15

[14] Public participation and Office of Communications target completion date moved to December 31, 2015 to address the processes and recommendations to be developed through a contract with the UC Davis Extension Collaboration Center to modernize the Department's public participation processes.

GOAL 5: UPDATE PERMITTING STANDARDS TO INCREASE PROTECTIONS FOR HUMAN HEALTH AND THE ENVIRONMENT

STRATEGY TO HELP ACHIEVE GOAL: Create and better articulate standards for enhancing protections for public health and the environment in permitting decisions.

OUTCOME: Develop and clarify standards and processes for making key permit determinations on approving, denying, revoking or modifying a permit or permit application and updating financial assurance requirements.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.b:** Improve efforts to ensure hazardous waste permits are protective, timely, legally defensible, and enforceable.

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.i:** Maintain a strong Financial Assurance program at all permitted facilities that reflect the actual cost of closure and post-closure work.

- **CPS RECOMMENDATION 6-1:** The Department should develop a new system of categorizing violations that reflects whether they present an immediate and direct threat to human health and safety, versus a less urgent threat that can be mitigated or resolved through further actions of the Department. The Department's current definition of "Class I violations," although mandated by law, includes both violations that pose immediate and direct threats along with many that are relatively low- or long-term threats. Until the Department has a system of violations that can distinguish between significant threats to human health and safety and lesser threats, it will not be able to provide an objective standard to guide its own staff actions and to inform the public that the significant threats have been mitigated through actions such as permit modification, denial or revocation.

- **CPS RECOMMENDATION 6-2:** The Department should distinguish between Notices of Deficiency that are prejudicial from those that are not, with grounds for prejudice being defined by the language in HSC 25200.8, including "substantially incomplete or substantially unsatisfactory information," or an untimely response. This change should be pursued as a change to Administrative Law. (The definition of "prejudicial" in the context of this recommendation is that an action to revoke a permit or renewal action would be <u>required</u> after a maximum of three such actions.)

- **CPS RECOMMENDATION 6-3:** DTSC should develop and adopt a risk standard for permitting, consistent with stakeholder input that the program must have a standard to demonstrate a clear, documented threat to public safety, human health, or environmental preservation, as a primary driver of appropriate permitting action.

- **CPS FINDING:**
  - *The Department does not have clear and objective criteria for making denial/revocation decisions that are based on valid standards of operational performance and threat.*
  - *It is commonly misunderstood that the Department should or must act to deny or permit after three Notices of Deficiency.*

- *Employees do not feel "the required statutory and/or regulatory authorities used in permits are clearly understood by all."*
- *Department policy with regard to financial assurance is not being achieved.*

Action	Deliverable	Target Completion
1	Establish a basis for proposing regulations that use technology selection and risk assessment protocols to meet public health and environmental protection requirements that apply to permits. • Create implementation materials for new regulations. • Focus on enhancing transparency on the control technologies and practices that meet applicable protectiveness standards and that facilitate expeditious permitting decisions.	6/30/16
2	Draft guidance on the use and application of "imminent and substantial" authorities to permitted facilities. Assemble a group of experienced legal, permitting, toxicology and enforcement personnel to clarify the process for making an "imminent and substantial" determination (Goal 4 Action 1). Develop a list of questions to raise in identifying potential "imminent and substantial" scenarios	12/31/14 (guidance) 6/30/15 (Goal 4 Action) 8/31/15 (list of questions) [15]
3	Where applicable, incorporate the "lessons learned" from dealing with these scenarios into permit writer training, manuals and the companion document.	6/30/16
4	Establish a simple process that the OLA, Permitting and Enforcement personnel can use to keep this "lessons learned" list updated as new scenarios occur.	6/30/16
5	Create a team of people from Permitting, OLA and Enforcement to draft guidance that details how Notices of Deficiency (NODs) fit into the statutory and regulatory requirements to initiate a denial or revocation of a permit. • Define the exact types of documents and deficiencies that trigger a formal NOD. • The guidance should identify the specific responsibilities or roles the permit writer, permitting unit chief, branch chief	3/15/2015[16] (legal basis document) 7/31/2015 (NOD LSS study results)[17]

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[15] Approach for addressing imminent and substantial endangerment has been clarified and follow-on steps sequenced to integrate with other work plan actions.

[16] Initial due date moved earlier (from June 30 to March 15), and Lean Six Sigma project implemented to develop NOD improvements.

[17] Lean Six Sigma is a quality improvement methodology that relies on a collaborative team effort to improve performance.

Action	Deliverable	Target Completion
	and other relevant parties have in the issuance of NODs and the denial or revocation process.	
6	Revise Chapter 9 of the Permit Writer's Manual and any other chapters discussing NODs to give more succinct guidance on the process of notifying the facility of deficiencies and the consequences for repeated NODs. • Ensure the Permit Writer's Manual and Companion Document reference the applicable regulations and statutory provisions.	12/31/15
7a	Create a team consisting of experts from Permitting, OLA and Enforcement that is tasked with drafting guidance that describes the violations that justify a basis for revocation or denial of a permit.	12/31/14 (assemble team)
7b	Develop a basis for regulations for determining when violations justify revocation or denial of a permit.	May 2015 (public input) November 2015 (2nd round of public input) April 2016 (draft basis of regulation)[18]
8	Create a process to update and modify the existing protocols to: • Calculate when financial assurance (for closure, post closure and corrective action) is adequate. DTSC, as beneficiary, can require the facility to pay all applicable costs. This will ensure the protection of human health and the environment. • Ensure the release of financial assurance funds meets closure, post closure[19] and corrective action requirements. • Apply the information in "Disclosure Statements," concerning past environmental violations, compliance orders, convictions and judgments, and any enforcement actions to help ensure permit decisions fully protect public health and the environment.	6/30/15

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[18] Plan adjusted to reflect development of legislative basis for identifying threshold of violations that would require permit revocation, denial, or suspension.
[19] Language clarified.

Action	Deliverable	Target Completion
9	Evaluate whether specialized staffing of financial responsibility unit needs to be expanded.	12/31/14
10	Review current permit writers' training requirements for the adequacy of instruction for other relevant laws and regulations. • Compile recommendations and develop and implement comprehensive training or provide guidance documents if necessary.	6/30/15

GOAL 6: ENHANCING ENFORCEMENT

STRATEGY TO HELP ACHIEVE GOAL: Ensure accountability for the application of legal requirements in permits.

OUTCOME: Develop a process of accountability to consistently ensure the early application of permitting requirements.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.b:** Improve efforts to ensure hazardous waste permits are protective, timely, legally defensible, and enforceable.

- **CPS RECOMMENDATION 2-1:** Formally articulate the objectives and purposes of the Permitting Program based on law, and ensure that these objectives are disseminated and understood by the permitting staff and the broader public. These objectives and purposes should specifically address the policy questions including: Under what circumstances lengthy permit renewals are in compliance with law.

- **CPS RECOMMENDATION 5-2:** The Permitting Office should develop instructional and guidance materials to support the Technical Review process flow. This should include clear and written decision-making criteria associated with each Section…

- **CPS FINDING:**
  - *Employees do not feel "the required statutory and/or regulatory authorities used in permits are clearly understood by all."*

Action	Deliverable	Target Completion
1	Require reviewers of draft permits (e.g., peer reviewers, supervisors, OLA, Enforcement) to certify that they have reviewed draft permit for clarity and specificity necessary to draft accurate CEQA project description and enforce permit conditions.	6/30/15
2	Formally articulate the objectives and purposes of the permitting program based on law and ensure that these objectives are disseminated and understood by the permitting staff.	12/31/14

GOAL 7: INFORM THE PUBLIC OF PROGRESS IN PROCESSING PERMITS

STRATEGY TO HELP ACHIEVE GOAL: Expand the information DTSC regularly provides to the public about the department's permitting decisions.

OUTCOME: Publish quarterly summary of statewide permit activity and provide tools for DTSC and the public to track progress on permitting actions.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.d:** Improve public confidence in permit decisions.

- **DTSC FIXING THE FOUNDATION R OBJECTIVE 4.l:** Share enforcement data with the public through the EnviroStor public web site.

Action	Deliverable	Target Completion
1	Project Managers should post quarterly summaries of permit activity on each facility's EnviroStor page.[20]	12/31/14 (instructions) 3/9/2015 and Ongoing (Implementation)
2	Provide Project Managers with a schedule, example, and detailed instructions for posting up-to-date and standardized quarterly updates on EnviroStor.[21]	12/31/14
3	Review the current process for consolidating community and stakeholder feedback. Develop recommendations for any necessary revisions to the process for communicating how public recommendations are reflected in the final decision.[22]	8/31/2015
4	Determine if a community workshop process is an effective communications and training tool to educate	8/31/2015

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[20] Due to resource constraints, it is not possible to upgrade EnviroStor to automatically generate Quarterly Updates at this time. Additionally, the goal is to make facility updates user-friendly, readable and limited to key information; therefore, it was determined that Project Managers will be responsible for posting updates.

[21] Due to resource constraints, it is not possible to upgrade EnviroStor to automatically generate Quarterly Updates at this time.

[22] DTSC is partnering with the UC Davis Extension Collaboration Center to modernize the Department's public engagement processes. Part of the contractor's Scope of Work includes developing recommendations for how DTSC can better solicit and reflect public input in its final permitting decisions.

Action	Deliverable	Target Completion
	community members and other stakeholders about the permitting process.[23] Target Completion: 8/31/15[24]	

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[23] Part of the contactor's Scope of Work includes identifying effective communication and public education tools, including community workshops.

[24] The target completion date for this deliverable has been modified to accommodate the Contactor's Scope of Work and corresponding schedule.

GOAL 8: IDENTIFY AND ADDRESS ENVIRONMENTAL JUSTICE CONCERNS EARLY IN THE PERMITTING PROCESS

STRATEGY TO HELP ACHIEVE GOAL: Create an EJ assessment and engagement process to identify environmental concerns early in the permitting process and better involve communities so they can understand and effectively participate in DTSC's decision making for permit applications.

OUTCOME: Early environmental assessment and action to help address concerns and enhance the public confidence in the protectiveness of the permit process and increase public understanding and participation in this process.

BASIS FOR APPROACH:

- **DTSC 2014-18 STRATEGIC PLAN OBJECTIVE 2.5:** Develop and apply criteria and processes to prioritize work within the hazardous waste enforcement and permitting programs, including the use of tools such as new environmental screening methods and Geographic Information System (GIS) technology.

- **DTSC 2014-18 STRATEGIC PLAN OBJECTIVE 5.3:** Develop and implement a process for regular public meetings to obtain broad-based public input on various DTSC projects and proposals and to better inform stakeholders concerning DTSC's programs and activities.

- **DTSC 2014-18 STRATEGIC PLAN OBJECTIVE 5.4:** Develop and implement an engagement strategy for impacted communities that align with program initiatives and community needs.

- **DTSC 2014-18 STRATEGIC PLAN OBJECTIVE 5.6:** Integrate DTSC's public participation strategies and activities into the site cleanup and hazardous waste management programs, including the use of cross-program workgroups.

- **CPS FINDING:**
  - *"CEQA staff is typically involved only in the final permit approval action."*
  - *"DTSC's Public Participation staff …is never included in initial scoping meetings to determine a community outreach strategy or to update a community contact list or determine outreach needs."*

Action	Deliverable	Target Completion
1	As a component of coordinating intra-Departmental coordination, identify specific points in the permit process and describe scenarios that trigger involvement by other programs, such as Public Participation. Specific points could include: • The identification of upcoming priority permits that may have a significant public health or environmental impact, as candidates for possible enhanced outreach.[25]	6/30/15[26]

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[25] This language is intended to add clarity by defining a purpose for identifying upcoming "priority permits".

Action	Deliverable	Target Completion
	The scoping stage of an application for a new or modified permit or closure of a facility or unit.	
2	With input from Public Participation and Communications, develop recommendations for[27] a new engagement strategy to identify and involve stakeholders earlier in the permitting process in communities where there are multiple sources of pollution and where residents may be more vulnerable to the effects of such pollution. Reference existing state and federal environmental justice guidance documents to help develop tools and methods for: • Planning and gathering information. • Coordinating within DTSC and with other BDOs. • Communicating with community members and the permit applicant. • Facilitating meaningful understanding and dialogue within a community on a facility's potential health, environmental and other impacts. Implementation of recommendations will occur under the leadership of the upcoming new DTSC EJ Deputy Director.	8/31/15[28] 12/31/15 (Implementation)
3a	Develop and implement an enhanced review procedure for facilities in communities where there are multiple sources of pollution and where residents may be more vulnerable to the effects of such pollution. The review could include: • A list of potential environmental health concerns, including locating existing data, studies and facilities (e.g. schools, day care centers and playgrounds) relevant to a particular community. • A list of potential mitigation measures that can be incorporated as permit conditions or in other documents to help address such concerns, or appropriate protocols to convey the lack of a health threat. Provide for correspondence with BDOs requesting that they provide analysis on issues that fall outside of DTSC's jurisdiction. • Perform initial consulting and research to identify approaches	6/30/15 (Initial consulting and research) 11/30/15 (Proposal for stakeholder input)[29]

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[26] The target completion date for this deliverable is being modified to mirror Goal 4 of the Work Plan, which pertains to coordinating intra-Departmental support during the permitting process. The triggers for Public Participation will likely be memorialized in the respective Roles and Responsibilities Document.

[27] DTSC is partnering with the UC Davis Extension Collaboration Center to modernize the Department's public participation processes. Part of the Contractor's Scope of Work includes developing recommendations for a new engagement strategy to involve stakeholders earlier in the process, particularly in environmental justice communities.

[28] The target completion date for this deliverable corresponds to the UC Davis Scope of Work and associated schedule.

[29] Accelerated and clarified this item from the original work plan due date of 3/31/16.

Action	Deliverable	Target Completion
	used by other state organizations. • Develop a concept for possible public input.	
4	Develop and implement a process to document DTSC's efforts to describe and apply mitigation measures to help address the community's environmental health concerns	3/31/16[30]

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[30] Completion of this action is accelerated to correspond to accelerated schedules for other Goal 8 actions.

GOAL 9: DEVELOP AND MAINTAIN STAFF CAPACITY

STRATEGY TO HELP ACHIEVE GOAL: Develop and implement a staff-training plan to ensure permitting staff are knowledgeable on current processes and procedures.

OUTCOME: Enhanced staff training on all work requirements and ensure staff are kept aware of new standards and requirements.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 5.e:** *Create a training plan that provides staff members with the skills they need to succeed in their jobs and careers.*

- **CPS RECOMMENDATION 7-2:** Permit Office Manager and Supervisors should develop a list of tasks and actions called for as part of the improvements recommend by this study, in priority and chronological order, and periodically review it will all staff, possibly at the twice-a-month training meetings.

- **CPS FINDING:**
  - *Employees do not feel "the required statutory and/or regulatory authorities used in permits are clearly understood by all."*
  - *Employees do not feel that project managers are provided with sufficient training or internal resources for technical review to obtain efficient permitting processes [sic].*

Action	Deliverable	Target Completion
1	Revise existing and new employee training plan: • Review existing plan. • Propose changes to the existing plan that are need to keep staff current. • Discuss at seniors meeting. • Clearly define the factors demonstrating "proficiency" for a permit writer." • Assess the time needed to train new staff to become proficient permit writers. • Prepare final updated plan including new and existing staff needs. • Review the training plan annually to determine the need for update or revisions. • Consider video conference as an optional delivery method.	Ongoing
2	Overview of the hazardous waste permitting process: • Develop training module. • Provide 2 training sessions (Sacramento/ Berkeley and	Completed 1/30/2014 2/7/2014[31]

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[31] Revised to include actual dates of initial training sessions.

Action	Deliverable	Target Completion
	Chatsworth) (note: additional training will be needed this year for new incoming BCP staff). • Revise module as needed to address all applicable standards (e.g. groundwater requirements for land disposal facilities and RCRA corrective action portions of permits, and other actions described below), provide annually and update training.	Ongoing
3	Financial Assurance: • Develop training module. • Provide 2 training sessions (Sacramento/Berkeley and Chatsworth). • Revise module as needed, provide annually (note: additional training will be needed this year for new incoming BCP staff).	Completed 10/15/2014[32] Ongoing
4	Environmental Justice and Public Participation: • Basic overview: prepare and provide 2 sessions. • Permitting-specific issues and strategies: prepare and provide 2 sessions. • Annual update, including latest strategies: prepare and provide 2 sessions.	Completed 4/2/2014[33] Ongoing
5	CEQA Process: • Basic overview. • Permitting-specific issues: prepare and provide 2 sessions. • Annual update, including any changes in regulations or procedures: prepare and provide 2 sessions.	Completed 12/3/2013 12/10/2013 [34] Ongoing
6	Advanced Closure and Post-Closure Cost Estimate: • Research available cost-estimating software programs, including remedial action cost engineering and requirements (racer) and cost-pro software programs. • Consult with other DTSC programs involved in cost-estimating (e.g., cleanup). • Develop recommendation on software and which staff should be trained and on such software programs.	Completed 12/18/2014 11/19/2014 [35] Ongoing
7	Effective Permit Writer: • Research permit writer training programs, including past	Summer 2015[36] Ongoing

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[32] Revised to include actual date of initial training session.
[33] Revised to include actual date of initial training session.
[34] Revised to include actual date of initial training sessions.
[35] Revised to include actual dates of initial training sessions.
[36] Updated to include target date for initial training session.

Action	Deliverable	Target Completion
	DTSC programs. • Develop California-specific training course. • Annual update or refresher: prepare and provide 2 sessions.	
8	Project Management: • Coordinate with cleanup program to provide basic training. • Prepare permitting-specific project management requirements to be incorporated as additional module. • Annual update or refresher: prepare and then provide in conjunction with annual permit writer update.	Ongoing
9	General Facility Standards: • Review existing training module. • Update and revise. • Provide training (2 sessions).	Completed 10/10/2014 10/2/2014[37] Ongoing
10	Closure and Post-Closure Plan Review: • Review existing training module. • Update and revise to include basic closure and post-closure cost estimating. • Provide training (2 sessions).	Completed 12/18/2014 11/19/2014[38] Ongoing
11	Tank Assessment: • Review existing training module. • Update and revise. • Provide training (2 sessions).	Summer 2015[39] Ongoing
12	Landfill Design: • Review existing training module. • Update and revise. • Provide training (1 session).	Completed 2/25/2015[40] Ongoing

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[37] Revised to include actual dates of initial training sessions.
[38] Revised to include actual dates of initial training sessions.
[39] Updated to include target date for initial training session.
[40] Revised to include actual date of initial training session.

Action	Deliverable	Target Completion
13	Permit Modification Process: • Review existing training module. • Update and revise. • Provide training.	Summer 2015[41] Ongoing
14	Racer: • Purchase software. • Train selected staff. • Coordinate training with other DTSC programs, e.g., cleanup.	Ongoing
15	Cost-Pro: • Coordinate with US EPA region 9 to provide cost-pro training for selected staff.	Ongoing
16	EnviroStor: • Train staff on upgrades as needed (minimum 2 sessions). • Annual update or refresher: prepare and then provide in conjunction with annual permit writer update.	Completed 4/22/2014 4/28/2014[42] Ongoing
17	SharePoint: • Train staff on upgrades as occur and needed (2 sessions completed; need for more sessions dependent on further upgrades). • Train managers on the use of Envirostor short reports to access readily available data as needed. • Annual update or refresher: prepare and then provide in conjunction with annual permit writer update.	Ongoing
18	Develop process to update staff on new processes and procedures.	12/31/14
19	File Maintenance, Public Records Act ,etc... • Develop a module that addresses proper file maintenance, document retention requirements, Public Record Act and other related issues. • Provide training (2 sessions) • Annual update or refresher, including any changes in regulations or procedures; prepare and provide 2 sessions	Completed 11/14/2014 12/1/2014 12/8/2014[43] Ongoing

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[41] Updated to include target date for initial training session.
[42] Revised to include target dates for initial training sessions
[43] Revised to include actual dates of initial training sessions.

GOAL 10: ADDRESS DATA MANAGEMENT NEEDS

STRATEGY TO HELP ACHIEVE GOAL: Address data management issues basis for approach:

OUTCOME: Improved data management system that effectively facilitates project management and improves performance metrics reporting.

BASIS FOR APPROACH:

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.k:** Implement a new information technology system that improves the availability and usability of hazardous waste management data

- **DTSC FIXING THE FOUNDATION OBJECTIVE 4.L:** Share all enforcement data with the public through the EnviroStor public website

- **CPS RECOMMENDATION 9-1:** The office of permitting should review and implement measures of operation, output, and outcome as recommended, and routinely report its result

- **CPS FINDING:**
  - *The department could and should make significant improvement in data entry and validation, and in the routine and effective use [sic] program measures, based on analysis of that data*

Action	Deliverable	Target Completion
1	Expand and Improve Permitting EnviroStor • Expand and improve both internal and public EnviroStor databases.	Ongoing[44]
2	EnviroStor Project Management • Upgrade EnviroStor capabilities to improve project management and track requests for support services.	3/31/15
3	EnviroStor SOPS for Uploading Documents, Tracking Dates; Other System Improvements • Develop standard operating procedures for EnviroStor that define the roles of the project managers and seniors or supervisors for 1) protocols for uploading documents; 2) entering and tracking dates; and 3) requiring document uploads as a prerequisite for entry of milestone dates. • Develop a policy that describes the documents required to be posted to EnviroStor and how and where such documents are to be stored on the database.	6/30/15

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[44] Envirostor improvements are delayed due to lack of resources. Bringing a DTSC business need to the contractor, and work will be priorities and chose based on discussion later 2015.

Action	Deliverable	Target Completion
	O Assess whether all documents currently required to be maintained in regional files should also be posted to EnviroStor. • Develop and implement document retention schedules, including automatic archiving of documents. • Improve data sharing capabilities. • Add drawing or GIS tools to identify where sites and units are located. • Enhance supervisor approval and tracking tools. • Make software changes (EnviroStor contractor). • Work with data systems unit and have a contractor test and debug the system.	
4	Utilize EnviroStor to schedule new permit activities. • Utilize EnviroStor to schedule new permit activities including scheduling work requests, meetings (including public meetings and hearings), financial assurance reports and closure and post-closure estimates.	12/31/14
5	Utilize EnviroStor to Track Project Progress.	Ongoing
6	Project Renewal Plan: • Develop and post project plan for each renewal.	9/30/14
7	Improve data quality for active and closed facilities and units in response to the enhancements made in this plan.	Ongoing
8	Develop metrics to increase staff use of Envirostor.	Ongoing