

**Fundamentals (4.a): Permitting/Enforcement
Process Efficiency/Consistency/Transparency - ENFORCEMENT**

Improve the efficiency and consistency in enforcing state hazardous waste laws and make the enforcement program's information and processes more accessible to the public.

Goal: Leverage the new Hazardous Waste Management Program (HWMP) structure and the experience and expertise of HWMP staff to improve efficiency and consistency in enforcing the Hazardous Waste Control Law, and make the enforcement program information and processes more accessible to the public.

To achieve these goals, Enforcement and Emergency Response Division (EERD) will work more closely with its internal partners, including the Office of Permitting and HWMP's Program and Policy Support Division to improve performance. EERD will also ensure consistent application of laws and regulations and will work with others in HWMP to address any gaps or lack of clarity in applicability of requirements. EERD will also ensure consistency in its selection of enforcement options and enforcement outcomes and enhance its case settlement processes. EERD will provide greater access to information and data about its activities, and make its enforcement activities more transparent and accessible to the public.

Timeline:

Apr - Jun 2013:

- Initiate posting of key inspection and enforcement documents on DTSC's website until a public side of EERD's EnviroStor database is completed.
- Implement a process for issue resolution between Office of Permitting (OP) and EERD when permit language or conditions are unclear or viewed differently by OP and EERD.

Jul – Sep 2013:

- Implement a pilot project to solicit public comment on proposed negotiated enforcement settlements.
- Evaluate practicality and options for making fines/penalty calculation information public.
- Provide all EERD staff with Annual Performance Appraisals and Individual Development Plans, and identify current and future training needs for EERD staff.
- Establish and implement procedures to provide timely review and comment on all draft permits regarding completeness and enforceability to the Office of Permitting.

Oct 2013 – Mar 2014:

- Complete internal cross training of EERD staff on different types of facilities and inspections, including hazardous waste landfills, refineries, used oil recyclers/handlers, transporters and metal recyclers.
- Building upon lessons learned in the interim document website posting initiative established in April-June 2013, complete a user-friendly public side of EERD's EnviroStor system. We will coordinate with the Office of Environmental Information Management (OEIM) and our EnviroStor vendor, to provide data on inspection and enforcement activity, as well as online access to key inspection and enforcement documents.