

Fundamentals (4.j): Permitting/Enforcement Integration of Hazardous Waste Management Program

Fully integrate the new Hazardous Waste Management Program.

Goal: Develop and implement a multi-functional, unified Hazardous Waste Management Program (HWMP) that improves the coordination, efficiency, consistency and effectiveness of DTSC's core programs.

In 2012, DTSC conducted an extensive evaluation of the impediments that impact DTSC's ability to meet its mission. Gaps that were identified included poor communication, the loss of critical roles and responsibilities, insufficient decision-making structure/process and an absence of unified goals and priorities between the Enforcement and Emergency Response, Office of Permitting, and policy/regulatory activities.

As a result, the HWMP was established that combines the Office of Permitting, Enforcement and Emergency Response Division and the newly formed Policy and Program Support Division. While this organizational structure is a critical first step to improve our service, there must be effective integration of shared goals, priorities, practices, procedures and expectations. The activities listed below are crafted to meet these goals.

Timeline:

April - June 2013:

- Implement HWMP Communication Plan and Transition Leadership Workgroup to ensure clear, consistent and direct communication between programs and to draft the mission, vision and goals for HWMP and each program.
- Coordinate inspection and permit project scheduled activities (such as inspections and permit decisions) between EERD and OP, financial assurance and cleanup programs to enhance coordination.
- Establish HWMP Policy Decision Team (PDT) by identifying core and support participants, processes and procedures and initiate coordination meetings to identify, prioritize and resolve policy issues and provide relevant guidance to HWMP staff.
- Initiate bi-monthly coordination meetings for all HWMP seniors and management to discuss inter-program coordination issues.

- Complete evaluation of existing inventory of facilities with corrective action requirements and designate lead program (either BERP or Permitting) to oversee corrective action.
- Coordinate with Policy and Program Support Division, BERP, OLA and OEA to develop and staff critical facilities teams to focus on issues at complex or problematic facilities.
- Establish work group to develop and complete guidelines for determining when enough is enough (sufficient violations to consider permit revocation/denial/suspension).
- Identify individual in HWMP who will provide overall RCRA grant reporting, coordination, improvement and oversight.

July – September 2013:

- Develop and implement cross training of Enforcement and Permitting staff with BERP and Policy and Program Support programs to improve coordination and effectiveness.
- Coordinate with OEIM to identify and implement internal procedures/systems to ensure appropriate and cross-program electronic access to information.

October 2013 – March 2014:

- Complete initial round of cross training of staff.
- Review effectiveness and update communication/collaboration initiatives noted above.