

STATE OF CALIFORNIA  
**Budget Change Proposal - Cover Sheet**  
 DF-46 (REV 09/14)

Fiscal Year 2015-16	Business Unit 3960	Department Toxic Substances Control	Priority No. 2
Budget Request Name 3960-102-BCP-BR-2015-MR		Program 3625 Hazardous Waste Management 9900100 Administration 9900200 Distributed Admin	Subprogram

Budget Request Description  
 Improving Enforcement Performance

**Budget Request Summary**

The Department of Toxic Substances Control's (DTSC) requests an augmentation of 11.0 two-year limited-term positions and \$1,409,000 from the Toxic Substances Control Account to improve the efficiency and effectiveness of its hazardous waste enforcement program; conduct a statewide community assessment to increase program transparency and public accessibility.

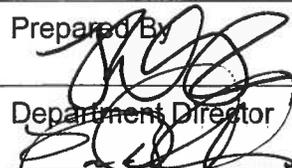
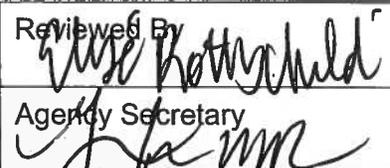
Requires Legislation <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Code Section(s) to be Added/Amended/Repealed H&SC 25173.6(b)	
Does this BCP contain information technology (IT) components? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, departmental Chief Information Officer must sign.</i>	Department CIO 	Date 5/12/15

For IT requests, specify the date a Special Project Report (SPR) or Feasibility Study Report (FSR) was approved by the Department of Technology, or previously by the Department of Finance.

FSR       SPR      Project No.      Date:

If proposal affects another department, does other department concur with proposal?       Yes       No

Attach comments of affected department, signed and dated by the department director or designee. 4/25/15

Prepared By 	Date 5/12/15	Reviewed By 	Date 5-12-15
Department Director	Date 5/12/15	Agency Secretary	Date 5/13/15

**Department of Finance Use Only**

Additional Review:  Capital Outlay     ITCU     FSCU     OSAE     CALSTARS     Dept. of Technology

BCP Type:       Policy       Workload Budget per Government Code 13308.05

PPBA      Date submitted to the Legislature



## Analysis of Problem

### A. Budget Request Summary

The Department of Toxic Substances Control (DTSC) requests 11.0 two-year limited-term positions and \$1,409,000 from the Toxic Substances Control Account (TSCA) for two years to conduct a review of its hazardous waste management enforcement program. Specifically, DTSC proposes to conduct a thorough assessment of its enforcement program, including evaluating workload and processes for inspections, investigations, and enforcement activities; developing, revising, and standardizing policies and guidance documents for enforcement staff, and evaluating statute and regulations pertaining to enforcement of hazardous waste laws. In addition, DTSC proposes to conduct a statewide assessment of its public engagement efforts to improve transparency and participation. Statutory changes also are requested to clearly authorize the use of TSCA for this purpose; this provision would sunset June 30, 2017.

### B. Background/History

The mission of DTSC is to protect the public and the environment from the harmful effects of toxic substances through fair, consistent, and timely enforcement.

The Hazardous Waste Management Program is responsible for administering DTSC's enforcement program through its Enforcement and Emergency Response Division (EERD) and the Office of Criminal Investigations (OCI). These activities are supported by staff located throughout the state.

EERD staff conducts inspections and has regulatory authority to enforce hazardous waste laws through administrative and civil enforcement. EERD activities include:

- Inspecting hazardous waste generators, transporters, and treatment, storage and disposal facilities;
- Conducting investigations of complaints on hazardous waste handling and consumer products (e.g., lead in jewelry, toxics in packaging);
- Leading and participating in focused enforcement initiatives;
- Initiating and settling administrative and civil enforcement actions;
- Providing local agency support including Certified Unified Program Agency (CUPA) evaluation, oversight and support; technical training and assistance;
- Acting as the CUPA for Imperial and Trinity Counties;
- In conjunction with DTSC's Public Participation Branch, coordinating with community action and Environmental Justice groups throughout California;
- Enforcing the statutes and regulations relating to hazardous waste, hazardous materials, universal wastes, treated wood waste, lead in jewelry, and toxics in packaging; and
- Providing assistance to the Office of Permitting in the review of hazardous waste facility permit applications including review of permit applications and draft permits for enforceability; compilation of the facility's compliance history for the permit decision; and support during the public hearing process.

OCI is responsible for investigating criminal violations of hazardous waste laws. The office includes sworn peace officers with the powers of arrest, search and seizure, as well as scientists (toxicologists). OCI enforcement functions include:

- Investigating complaints of illegal handling of hazardous waste;
- Supporting multi-jurisdictional criminal and civil enforcement investigations in partnership with state and local prosecutors; and
- Planning and participating in environmental initiatives focused on high priority illegal activities.

EERD and OCI have shared responsibility for safeguarding the people and environment of California from the harmful effects of toxic substances through the investigation of violations of the Hazardous Waste Control Law (HWCL), inspection of hazardous waste facilities and enforcement of the HWCL and implementing regulations.

## Analysis of Problem

### C. State Level Considerations

This proposal is consistent with the following departmental and statewide objectives.

DTSC's strategic plan highlights several aspects of its enforcement program with the goal of improving its effectiveness, efficiency and fairness. The strategic plan includes the following objectives:

Objective 2.3: Improve effectiveness, efficiency, and consistency in enforcing California's hazardous waste laws, and make DTSC's enforcement program's information and processes more accessible to the public.

Objective 2.4: Improve public confidence in DTSC's enforcement decisions by establishing clear guidelines for decision points that ensure enforcement actions result in timely resolution with appropriate penalties and corrective actions.

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.

Objective 2.9: Using a cross-functional workgroup, assess, report on, and implement initiatives to increase collaborative enforcement efforts between DTSC's Enforcement and Emergency Response Division and Office of Criminal Investigations, CUPAs, U.S. EPA, local prosecutors, and other enforcement agencies.

Besides its strategic plan, DTSC's Fixing the Foundation Fundamentals Work Plan includes several components related to enforcement. They include the following elements:

4(a): 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.

4(c): Establish clear guidelines on key decision points within the enforcement process to ensure enforcement actions result in timely settlements with appropriate penalties and corrective actions.

4(e): Establish clear priorities for the enforcement program.

The Governor's 2015-16 Budget Summary acknowledges DTSC's efforts to reform itself. The budget acknowledges that to maximize the benefits of these reforms, "the Department must enhance compliance with strengthened hazardous waste management operations."

The Assembly Budget Committee's Preliminary Review of the 2014-15 Budget asked "how is DTSC ensuring that Certified Unified Program Agencies (CUPAs) are properly and effectively implementing the hazardous waste program and that appropriate penalties and corrective actions are taken?" and "what actions have been taken to make the enforcement program's information and processes more accessible to the public?"

Statewide process improvements at DTSC will strengthen compliance at the local level through our work with CalEPA and the CUPAs. The CUPAs have the primary responsibility for inspecting and enforcing the hazardous waste regulations at hazardous waste generators. California Health and Safety Code Section 25404.4 requires the CalEPA Secretary to periodically review each CUPA's ability to carry out the requirements of the chapter. Each CUPA is assessed every three years by a team made up of staff from the state agencies with Unified Program responsibilities including DTSC. DTSC's evaluation process includes a field evaluation of CUPA inspectors and an office evaluation of program documents. DTSC provides technical assistance and ongoing training to the CUPAs.

### D. Justification

Enforcement of hazardous waste laws is a key component of DTSC's mission. Enforcement protects public health and the environment through inspection, investigation, and timely and appropriate enforcement actions on violations of hazardous waste laws and permits.

## Analysis of Problem

In the past DTSC has taken significant actions to improve the enforcement program, including: selecting a new Hazardous Waste Management Program Deputy Director with more than 27 years of environmental and hazardous materials enforcement experience; reorganizing of the Hazardous Waste Management Program to place OCI and EERD under the same reporting structure; creating a Division Chief to manage the Permitting functions; closely monitoring and rapidly filling vacancies; increasing public access to inspection and enforcement information through its EnviroStor data management system; and initiating the update and revision of existing inspection and enforcement policies and guidance.

While these initial efforts are important and have been successful in and of themselves, they have also identified key areas in the DTSC's Enforcement Program where further or focused improvements are needed. These areas include:

- The program needs clearer and more consistent metrics for assessing facility compliance, guidelines for staff in the application of the metrics, and training to support their use.
- Existing policies and procedures for responding to non-compliance need to be more specific and updated to provide appropriate deterrence against future non-compliance.
- The Department needs to improve its responsiveness to communities impacted by hazardous waste facilities and enhance their understanding of, and participation in, regulatory decisions that affect them.
- DTSC's actions on enforcement-related matters are not timely enough; specifically:
  - Health and Safety Code section 25185 requires DTSC to send copies of inspection reports by 65 days from the date of the inspection. Enforcement data collected since 2000 indicate that 17 percent of inspection reports are sent late to the facility by an average 92 days.
  - DTSC's internal policy and the U.S. EPA Civil Enforcement Response Policy specify that final administrative orders should be issued by 360 days from the date of the inspection. Currently, it takes DTSC an average of 379 days to issue an administrative order.
  - DTSC takes an average of 607 days to settle an administrative case with its own Office of Legal Affairs, 396 days to formally refer cases to the Attorney General's Office, and 1,023 days to file, through the Attorney General's Office, a civil enforcement case.

DTSC requests 11.0 two-year limited term positions to review DTSC's inspection and enforcement program, evaluate opportunities for improvement, and implement a clear and detailed Improvement Plan. DTSC has begun a limited enforcement program review and some process improvements, but a lack of staff resources has severely restricted this effort. A more robust and in-depth process review is needed. The results of this review will be analyzed and reported to DTSC management. The report will also include development of clear and consistent workload standards for both inspection and enforcement activities and recommendations for process improvements and reforms with an emphasis on recommendations that are practical and can be implemented with minimal or no additional cost. Those recommendations that are adopted for implementation will require the development of a work plan. The enforcement program work plan will include implementation strategies, timelines, and clearly identified objectives and goals to assess performance and successful adoption rates.

With these requested resources, DTSC will complete a detailed review and analysis of the enforcement program, assess community concerns, and develop and deploy an effective strategy for engaging affected members of the public.

### Enforcement and Emergency Response Division:

DTSC request 9.0 positions to address the workload identified in this proposal. Currently, EERD has fewer than 70 staff members available to provide inspection, investigation, and enforcement activities. DTSC regulates 118 treatment, storage, and disposal facilities with hazardous waste facility permits or other authorization, 904 registered hazardous waste transporters, and more than 1,200 e-waste handlers and recyclers, as well as an unknown number of restricted/banned product handlers. Thirteen staff members implement the Unified Program as the CUPA for Imperial and Trinity Counties. Outside

## Analysis of Problem

of the 13 CUPA staff, EERD staff members have been performing an average of 526 inspections annually.

Under this proposal, DTSC will evaluate the adequacy of the current level/frequency of inspections at hazardous waste facilities, transporters and other handlers under its sole oversight. Of the 118 active hazardous waste facilities with a permit from DTSC, 90 are operating facilities with the remainder being closed facilities with a post-closure permits. The three operating hazardous waste landfills in California have historically been inspected once a year and the communities near these landfills have concerns that they are not complying with hazardous waste laws. DTSC would identify an increased inspection frequency for these operating landfills to assure their compliance as well as review the inspection frequency for other types of facilities.

Current resources allow EERD to inspect 50 to 60 of the 904 hazardous waste transporters annually. The evaluation of the inspection schedule will identify an inspection plan and frequency that will significantly enhance compliance in this sector and will recommend resource realignment and/or allocations to implement the plan and schedule.

DTSC will complete an in-depth evaluation and review of the hazardous waste complaint tracking system and the complaint response by EERD, OCI and the CUPAs. The data for fiscal year 2013-14 show that of 646 total complaints received, OCI and EERD investigate approximately 20 percent, with the remainder being referred to other federal, state or local agencies.

The requested resources would also conduct statewide enforcement program reviews and evaluations, including: an evaluation of how to increase transparency to enhance public accessibility to DTSC's enforcement program; prepare reports and develop the process improvement implementation work plan, conduct workload analyses and develop clear and consistent inspection, investigation, and enforcement workload standards; develop, revise and maintain policy and guidance documents; identify any necessary regulatory or statutory changes and draft recommended language; help develop analytical tools to assist EERD with inspection and enforcement prioritization and provide technical support and assistance in implementing the process improvement plan.

### Office of Communications:

DTSC is requesting 1.0 Public Participation Specialist (PPS). The PPS would assess community concerns and develop and deploy an effective strategy for engaging affected members of the public. As part of process improvement, it will be necessary to engage communities located near hazardous waste facilities. The PPS will provide support in the development and implementation of an effective communication strategy.

### Office of Environmental Information Management:

DTSC request 1.0 Staff Information Systems Analyst (SISA) in the Office of Environmental Information Management (OEIM). OEIM is responsible for providing information technology (IT) services to DTSC. These critical services include the design and maintenance of DTSC's EnviroStor data management system. EnviroStor tracks detailed information concerning DTSC's Cleanup, Permitting, Enforcement and Office of Criminal Investigations activities. The system also provides public users with access to non-confidential information and documents for over 12,000 cleanup sites and hazardous waste facilities including data on enforcement actions taken at these sites/facilities.

The requested resource will participate in the program review process and provide the necessary data and analytical tools from EnviroStor to ensure that the program review and the recommended improvements are data-driven. The SISA will prepare training and update documentation to incorporate modifications to the EnviroStor system. This position will also be responsible for the implementation of any required system enhancements or modifications, creating system documentation and providing user training to ensure that DTSC's data are protected and meets data standards.

## Analysis of Problem

### E. Outcomes and Accountability

DTSC has identified the following five goals. At the end of the two-year process, DTSC will have developed a work plan and accomplished the following:

1. Clearly defined the inspection and enforcement process and identified areas for streamlining the process as well as barriers to efficient inspection and enforcement.
  - o Performed an extensive review of the inspection and enforcement process and identified areas for improvement;
  - o Created a clear and detailed improvement plan; and
  - o Identified barriers to process improvement that require regulatory or statutory changes and drafted language to make those changes.
2. Established clear metrics to evaluate performance in inspection and enforcement activities.
  - o Developed workload, tracking and performance metrics reports in EnviroStor to provide data in order to develop clear and consistent workload standards; and
  - o Updated EnviroStor system documentation and training manuals to ensure long-term success of the system.
3. Created a formal review process for enforcement case management.
  - o Drafted procedures that will then be converted policies and guidance to be developed, updated or deleted;
  - o Identified technical guidance and training for staff to implement process improvements; and
  - o Developed procedures or established a workgroup to review enforcement cases for consistency and precision.
4. Clearly communicated the inspection and enforcement processes to stakeholders and the community.
  - o Evaluated and initiated enhancement efforts on the public EnviroStor website to improve program transparency on DTSC's enforcement efforts.
5. Incorporated community engagement in setting inspection and enforcement priorities.
  - o Developed an effective communication strategy for engaging neighborhoods close to inspection and enforcement cases; and
  - o Identified and started development of analytical tools to prioritize DTSC's enforcement efforts.

### F. Analysis of All Feasible Alternatives

Alternative 1: Adopt the proposal to authorize 11.0 two-year limited term positions to complete the evaluation, analysis, development, and implementation of improvements in the enforcement program.

Pros:

- Results in a complete detailed evaluation and review of the enforcement program.
- Ensures enforcement processes are clearly defined.
- Establishes a work plan for implementing process improvements to its enforcement efforts.
- Improves timeliness of enforcement actions.
- Improves transparency and the public's access to DTSC's enforcement program.
- Results in processes to better monitor workload and prioritize enforcement efforts.

Cons:

- Requires expenditure of State funds for additional positions.

## Analysis of Problem

Alternative 2: Redirect existing staff for two years to complete the evaluation, analysis, development, and implementation of process improvements in the enforcement program.

Pros:

- Results in a complete detailed evaluation and review of the enforcement program.
- Ensures enforcement processes are clearly defined.
- Establishes a plan for implementing process improvements to its enforcement efforts.
- Improves timeliness of enforcement actions.
- Improves transparency and the public's access to DTSC's enforcement program.
- Results in processes to better monitor workload and prioritize enforcement efforts.

Cons:

- Would reduce the number of inspections and enforcement actions completed during the two year period.
- May decrease compliance as a result of reduced inspections and enforcement during the two year period.
- Would delay other mission critical public participation efforts in Cleanup, Permitting, and Enforcement during the two year period.
- Would delay other mission critical EnviroStor projects during the two year period.

Alternative 3: Do nothing/maintain status quo.

Pros:

- Does not require the expenditure of additional State funds.

Cons:

- A complete evaluation and review of the enforcement program will not be performed.
- The enforcement process will not be clearly defined.
- DTSC will not be able to implement a process improvement plan for the enforcement program.
- There will continue to be no clear and consistent written workload standards and DTSC would still have issues with prioritization of enforcement efforts.

## G. Implementation Plan

July 2015

- Upon enactment of the 2015 Budget Act, begin the recruitment process to fill the eleven (11.0) two-year limited term positions. After filling these positions, DTSC will begin their training.

September 2015 – December 2015

- Begin performing an extensive review of the inspection and enforcement processes in September 2015.
- Begin review of existing data on public concerns and awareness of enforcement and compliance issues in September 2015.
- Complete review of inspection and enforcement processes by December 2015.
  - Identify areas for improvements to the inspection processes.
  - Identify areas for improvements to the enforcement processes.
- Complete review of data on public concerns and awareness of inspection and enforcement process by end of December 2015.
  - Identify gaps in DTSC's data on public concerns and awareness, and begin development of a strategy for community engagement to fill those gaps.
- Begin community engagement assessment by end of December 2015.

## Analysis of Problem

### January 2016 – July 2016

- Prepare report summarizing results of inspection and enforcement program review with recommendations for program improvements.
  - Complete inspection and enforcement program review report by end of March 2016.
- Conclude community engagement assessment by end of April 2016.
  - Develop draft of community engagement improvements for program improvements plan by end of May 2016.
- Begin drafting detailed program improvement work plan based on recommendations adopted from report and community engagement assessment during April – May 2016.
- Circulate draft program improvement work plan for review and comment during May – June 2016.
- Develop clear and accurate workload standards by end of June 2016.
- Finalize program improvement work plan by end of June 2016.
- Begin implementation of program improvement work plan July 2016.
- Work on identified policies and guidance to be developed or updated beginning July 2016.
- Report recommended changes to regulation or statute that create barriers to process improvement by July 2016.

### August 2016 – June 2017

- Draft language for regulatory or statutory changes, including needed changes for community engagement by end of August 2016.
- Evaluate and report progress in implementation of program improvement work plan ongoing beginning August 2016 through June 2017.
- Develop technical guidance and training for staff to implement process improvements by end of December 2016.
- Report to DTSC management, the Administration and Legislature regarding outcomes of process improvement plan by end of June 2017.

## H. Supplemental Information

This proposal includes standard operating expenses which include general expense, communication, travel and training. In addition, this proposal includes \$20,000 for contracts to increase existing system capacity and enhance reporting functionality in the EnviroStor data management system.

## I. Recommendation

Adopt Alternative 1. This alternative maximizes DTSC's ability to increase the efficiency of the enforcement process, decrease the time it takes to initiate a formal enforcement action, improve the overall inspection and enforcement processes and procedures to take appropriate enforcement that is protective of human health and the environment without sacrificing other critical department efforts.







DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Workload Analysis Chart

Budget Request Name: 3960-102-BCP-BR-2015-MR

Budget Request Description: Improving Enforcement Performance

Priority 2

ACTIVITY/TASK	Basis/Assumption for Workload Standard	PROJECTED 2015-16					DIFFERENCE ADDITIONAL HOURS NEEDED
		HOURS TO COMPLETE TASK	NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY		
<p><b>ENFORCEMENT DIVISION (910 positions)</b></p> <p>1 ea Env Program Mgr I, Sr Env Scientist Sup, Sr Env Scientist, SSA, AGPA, OT</p> <p>3 Env Scientists</p> <p>1) Enforcement Program Review: Hours include a detailed process review and analysis of the hazardous waste enforcement program including both the inspection and enforcement processes; identification of areas requiring development of workload standards; identify policies and guidance needing development, updating or deletion, and barriers to improvements requiring statutory or regulatory changes; identify needed technical guidance and training needed for implementation of process improvements; development of status reports and a final report with recommendations for program improvements in both processes.</p>	Goal based on past experience	7,000	1	7,000.00	-	7,000.00	
<p>2) Workload Standards: Hours include development of a report containing clear and consistent workload standards for the different types of inspections and enforcement options at identified stages in the processes.</p>	Goal based on past experience	3,700	1	3,700.00	-	3,700.00	
<p>3) Improvement Plan: Hours include development of a detailed process improvement plan incorporating all identified areas recommended for improvement to both the inspection and enforcement processes.</p>	Goal based on past experience	5,500	1	5,500.00	-	5,500.00	
<p><b>TOTAL HOURS REQUIRED PER YEAR</b></p>							16,200.00
<p><b>NUMBER OF PY (Position) NEEDED (HRS/1800)</b></p>							9.00

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
 Workload Analysis Chart  
 Budget Request Name:3960-102-BCP-BR-2015-MR  
 Budget Request Description: Improving Enforcement Performance  
 Priority 2

		PROJECTED 2015-16					
ACTIVITY/TASK	Basis/Assumption for Workload Standard	HOURS TO COMPLETE TASK	NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY	DIFFERENCE ADDITIONAL HOURS NEEDED	
<b>OFFICE OF COMMUNICATIONS</b>							
<b>Public Participation Specialist (1.0)</b>							
1) Enforcement Program Review: Hours include a review of existing policies and procedures, identification of existing data on public concerns/interactions, EnviroScreen data which identifies sensitive environmental justice communities, and communities with a high potential for DTSC enforcement.	Goal based on past experience.	200	1	200.00	-	200.00	
2) Workload Standards: Hours include development of a report containing clear and accurate workload standards for the different types of community outreach activities associated with enforcement actions and community outreach to areas where there is a high likelihood of DTSC enforcement actions.	Goal based on past experience.	200	1	200.00	-	200.00	
3) Strategy Development: Hours include identification of missing data that will allow DTSC to develop a comprehensive strategy for establishing communication protocols with impacted communities where there is a likelihood of enforcement actions, and a strategy for capturing that data.	Goal based on past experience.	200	1	200.00	-	200.00	
4) Assessment Process: Hours include reaching out to focus groups throughout the state to identify components of a comprehensive outreach strategy. This will include extensive travel, meetings, development of summary data, internal review and analysis.	Goal based on past experience.	800	1	800.00	-	800.00	
5) Improvement Plan: Hours include development of a detailed process improvement plan incorporating information and data gathered during internal review and assessment process.	Goal based on past experience.	400	1	400.00	-	400.00	
<b>TOTAL HOURS REQUIRED PER YEAR</b>				<b>1,800.00</b>	<b>-</b>	<b>1,800.00</b>	
<b>NUMBER OF PY (Position) NEEDED (HRS/1800)</b>				<b>1.00</b>	<b>-</b>	<b>1.00</b>	

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
 Workload Analysis Chart  
 Budget Request Name:3960-102-BCP-BR-2015-MR  
 Budget Request Description: Improving Enforcement Performance  
 Priority 2

PROJECTED 2015-16						
ACTIVITY/TASK	Basis/Assumption for Workload Standard	HOURS TO COMPLETE TASK	NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY	DIFFERENCE ADDITIONAL HOURS NEEDED
<b>OFFICE OF ENVIRONMENTAL INFORMATION MANAGEMENT</b>						
<b>Staff Information Systems Analyst (1.0)</b>						
1) Enforcement Program Review: Hours include participation in the detailed process review and analysis of the hazardous waste enforcement program including both the inspection and enforcement processes; providing data and data analysis assistance in the identification of areas requiring development of workload standards; conducting business systems impact analysis based on the updating or deletion of policies and guidance and any barriers to improvements requiring statutory or regulatory change; identify needed technical guidance and training needed for implementation of process improvements; development of status reports and a final report with recommendations for program improvements in both processes.	Goal based on past experience	820	1	820.00	-	820.00
2) Workload Standards: Hours include development of a report containing clear and accurate workload standards for the different types of inspections and enforcement options at identified stages in the processes.	Goal based on past experience	450	1	450.00	-	450.00
3) Improvement Plan: Hours include development of a detailed system analysis and business systems documentation to support modifications needed based on identified areas recommended for improvement for both the inspection and enforcement processes.	Goal based on past experience	220	1	220.00	-	220.00
4) System Documentation and User training	Goal based on past experience	310	1	310.00	-	310.00
<b>TOTAL HOURS REQUIRED PER YEAR</b>				<b>1,800.00</b>	<b>-</b>	<b>1,800.00</b>
<b>NUMBER OF PY (Position) NEEDED (HRS/1800)</b>				<b>1.00</b>	<b>-</b>	<b>1.00</b>

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
 Workload Analysis Chart  
 Budget Request Name:3960-102-BCP-BR-2015-MR  
 Budget Request Description: Improving Enforcement Performance  
 Priority 2

PROJECTED 2016-17							DIFFERENCE ADDITIONAL HOURS NEEDED
ACTIVITY/TASK	Basis/Assumption for Workload Standard	HOURS TO COMPLETE TASK	NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY		
ENFORCEMENT DIVISION (9.0 positions) Goal: Effective Program Mgr, Sr Env Scientist, Sup, Sr Env Scientist, SSA, AGP, 10 Tech, 3 Env Scientists							
1) Improvement Plan Implementation: Hours include oversight and tracking of the recommended process improvements; reporting to management on plan progress including key milestones and program outcomes; evaluation of impacts of implemented improvements on program performance.	Goal based on past experience.	3,200	1	3,200.00	-	3,200.00	
2) Policy and Guidance: hours include work on updating or developing identified policies and guidance.	Goal based on past experience.	4,100	1	4,100.00	-	4,100.00	
3) Barriers to Improvement: Hours include development of a report on recommended changes needed in statute and/or regulation that create barriers to process improvements; drafting of language for identified regulatory and/or statutory changes.	Goal based on past experience.	3,900	1	3,900.00	-	3,900.00	
4) Technical Guidance and Training: Hours include development of technical guidance and training in areas identified in the program review process needed to fully implement or support the process improvements.	Goal based on past experience.	3,600	1	3,600.00	-	3,600.00	
5) Outcomes Report: Hours include development of a final report to DTSC management providing the outcomes of the implemented process improvement plan and identification of any areas still in need of improvement.	Goal based on past experience.	1,400	1	1,400.00	-	1,400.00	
<b>TOTAL HOURS REQUIRED PER YEAR</b>				<b>16,200.00</b>		<b>16,200.00</b>	
<b>NUMBER OF PY (Position) NEEDED (HRS/1800)</b>				<b>9.00</b>		<b>9.00</b>	

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
 Workload Analysis Chart  
 Budget Request Name:3960-102-BCP-BR-2015-MR  
 Budget Request Description: Improving Enforcement Performance  
 Priority 2

ACTIVITY/TASK	Basis/Assumption for Workload Standard	PROJECTED 2016-17					DIFFERENCE ADDITIONAL HOURS NEEDED
		HOURS TO COMPLETE TASK	NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY		
<b>OFFICE OF COMMUNICATIONS</b>							
<b>Public Participation Specialist (1.0)</b>							
1) Improvement Plan Implementation: Hours include incorporating community outreach elements into enforcement processes, reporting to management on plan progress including key milestones and outcomes, evaluation of impacts of implemented improvements on community awareness and participation.	Goal based on past experience.	450	1	450.00	-	450.00	
2) Policy and Guidance: Hours include updating or developing identified policies and guidance, and where necessary statutory or regulatory changes. If statutory or regulatory changes are necessary, hours include development of strategy and schedule for changes.	Goal based on past experience.	750	1	750.00	-	750.00	
3) Technical Guidance and Training: Hours include development of guidance and training identified from the assessment process, and conducting training.	Goal based on past experience.	400	1	400.00	-	400.00	
4) Outcomes Report: Hours include assisting in the development of a final report to DTSC management providing the outcomes of the implemented processes and identification of areas still in need of improvement.	Goal based on past experience.	200	1	200.00	-	200.00	
<b>TOTAL HOURS REQUIRED PER YEAR</b>				<b>1,800.00</b>		<b>1,800.00</b>	
<b>NUMBER OF PY (Position) NEEDED (HRS/1800)</b>				<b>1.00</b>		<b>1.00</b>	

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
 Workload Analysis Chart  
 Budget Request Name: 3960-102-BCP-BR-2015-MR  
 Budget Request Description: Improving Enforcement Performance  
 Priority 2

ACTIVITY/TASK	Basis/Assumption for Workload Standard	HOURS TO COMPLETE TASK	PROJECTED 2016-17				NUMBER OF ADDITIONAL HOURS NEEDED
			NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY	DIFFERENCE	
<b>OFFICE OF ENVIRONMENTAL INFORMATION MANAGEMENT</b>							
<b>Staff Information Systems Analyst (1:0)</b>							
1) Improvement Plan Implementation: Hours include implementing system enhancements based on improvement plan.	Goal based on past experience.	850	1	850.00	-	850.00	
2) Policy and Guidance: hours include work on updating or developing identified policies and guidance for the use of EnviroStor.	Goal based on past experience.	350	1	350.00	-	350.00	
3) Barriers to Improvement: Hours include participating in the development of a report on recommended changes needed in statute and/or regulation that create barriers to process improvements; drafting of language for identified regulatory and/or statutory changes.	Goal based on past experience.	100	1	100.00	-	100.00	
4) System Documentation and User Training: Hours include updating/developing system documentation and user training.	Goal based on past experience.	420	1	420.00	-	420.00	
5) Outcomes Report: Hours include development of a final report to DTSC management providing the outcomes of the implemented process improvement plan and identification of any areas still in need of improvement.	Goal based on past experience.	80	1	80.00	-	80.00	
<b>TOTAL HOURS REQUIRED PER YEAR</b>							
<b>NUMBER OF PY (Position) NEEDED (HRS/1800)</b>							
				1,800.00	-	1,800.00	
				1.00	-	1.00	