4.0 PROJECT PLANNING

To aid the permit writer with managing the myriad of steps and details associated with processing a permit application and to allow more effective project auditing and oversight by supervisors, the permit writer should prepare a permit project planning chart (Appendices 4.0-1 and 4.0-3) and milestone checklist (Appendices 4.0-4 and 4.0-5).

Permit Planning Chart

The permit project planning chart is used to determine what project tasks may overlap each other, what resources are needed over what period of time for each task, and the relationship of each task to the overall project. The planning chart should clearly indicate the number of staff hours budgeted for each task, the total calendar period it will take to accomplish each task, and which tasks require close coordination with others (or assignment to others) to complete the project on schedule.

Permitting Workload Standards

If there are differences between the workload standards given and required project activities, the permit writer may propose custom workload standards, using those given as a guide. As a general rule, a project should not exceed the total hours given in the workload standards. Problems between the given standards and actual activities should be reported to permitting seniors. Current policy is to have the permitting program fully self supporting, with activity fee (Chapter 5.0, Fees) amounts reflective of DTSC's cost for performing the activity requested by the applicant. As DTSC moves more toward this goal, it will be increasingly important to have workload standards reflect actual permitting activities.

Coordination With Other Reviewers

A completed copy of the planning chart should be given to all staff participating in the project to make it clear when each person's critical milestones are due. The permit writer should review the completed plan with the permit senior to ensure that the planned project schedule is accurate, acceptable and consistent with departmental annual work plan objectives and goals. For convenience, Appendix 4.0-1 lists standard permit processing steps; Appendix 4.0-3 is blank and may be used for projects that do not follow the standard steps.

The project plan will dictate the timing of sending to the other reviewers the sections of the application requiring review. Keep in mind that the other reviewers will typically have many other projects to work on and may not be able to start on the review request immediately upon receipt. The permit writer is encouraged to send the other reviewers their material as soon as practical. If the reviewer needs a work request from to be approved by the permitting senior, submit with the material to be reviewed with the form annotated to include the following information:

- What has to be reviewed.
- What checklist has to be used and what checklist items have to be answered.
- What type of deficiencies will need suggested NOD statements from the reviewer.
- When the review is due to the permit writer, as noted in the project plan.
- The format the reviewers comments should be provided in.
- Any specific questions, issues, or problems the permit writer wants the reviewer to focus on.
- A friendly note to the reviewer that the project has a strict schedule and that it is critical that the reviewer's comments be received on time so as to not delay the preparation of the NOD.
- A friendly note listing the interim dates the permit writer will check with the reviewer

about the progress of the review.

If no work request form is needed, a memo to each reviewer with this same information should be prepared.

Project Tracking and RCRIS

The permit milestone checklist is used by the permit writer and senior to summarize planning chart milestone dates and track the progress of a project through completion. Tracking the progress of each project aids department managers, the Legislature, the U. S. EPA, and oversight groups and agencies to know whether forecasted milestones and goals are being met. For convenience Appendix 4.0-4 list standard permit milestones; Appendix 4.0-5 is blank and may be used for projects that do not follow the standard milestones.

For simple projects, the permit writer may simply photocopy the appropriate appendices and fill them in by hand. For complex projects, it is best to prepare a WordPerfect® or Lotus® spreadsheet that duplicates the forms. The spreadsheets may then be easily modified from time to time as the project plan is finalized through negotiations with all parties involved in the review and processing of the application.

Some regional offices have other software programs that may be used effectively for planning and budgeting resources for complex projects with multiple reviewers. Permit writers are encouraged to learn how to use this software, provided the project lends itself to the capabilities of the software. Some programs can be a tremendous time-sink, with little or no benefit toward completing required project outputs.

KEY QUESTIONS

Which project milestones and deadlines have been included DTSC's annual workplan and RCRIS?

Does everyone associated with the project fully understand their critical milestones and deadlines?

Is the proposed project schedule consistent with departmental objectives and goals?

REQUIRED OUTPUTS

Completed permit project planning checklist.

Completed planning chart.

Copies of the completed planning chart distributed to everyone associated with the project.

Full concurrence with the project milestones and deadlines by everyone associated with the project.

Review material distributed to all other reviewers.

APPLICABLE REGULATIONS AND STATUTES

State Laws and Regulations:

Federal Laws and Regulations:

Other Laws and Regulations:

POLICIES

DTSC Policies:

EPA Policies:

Other Policies:

INSTRUCTIONS TO APPLICANTS

Handouts to be Given to Applicants:

Examples to be Given to Applicants:

CEQA CONSIDERATIONS

PUBLIC PARTICIPATION CONSIDERATIONS

It is important at this planning phase to communicate with the Public Participation Supervisor to ensure that public participation support hours are properly estimated and planned into the Public Participation Unit's workload.

LEGAL CONSIDERATIONS

INTERAGENCY AGREEMENTS & MOUs

COORDINATION WITH OTHERS

Other DTSC Units:

It is the permit writer's responsibility to determine what other DTSC technical support is needed for the project and ensure that the project schedule is consistent with the schedules of the technical support staff providing assistance. It is also the permit writer's responsibility to query other departmental programs to determine whether they have an interest in the project. It is not uncommon for a site undergoing permitting to also be part of an enforcement investigation or a site mitigation activity. Close coordination with these other programs is very important to avoid conflicting requirements or schedules being imposed on the permit applicant.

Environmental/Legislative/Industry Groups:

Other Agencies:

It is also important to coordinate the project with other local, state, and federal agencies. It is very typical for a site undergoing permitting to be regulated by the Regional Water Quality Control Board and local air pollution control district. Coordination with these other agencies is important to avoid conflicting requirements or schedules.

Special Requests:

At times local interest groups may request permit processing schedules. The permit writer should accommodate such requests to every extent possible.

STEP-BY-STEP PROCEDURES

Flow Charts:

Checklists:

TECHNICAL REFERENCES

EXAMPLES OF COMPLETED WORK PRODUCTS

An example completed checklist and planning chart accompanies this step.

TIMELINE AND PLANNING

Permit Processing Chart:

Workload Standards:

Statutory & Other Deadlines:

WP File Name: 1/CH0400_P.MAN

List of Examples:

List of Appendices:

4.0-1 DTSC Permit Project Planning Chart
4.0-3 Project Action Plan
4.0-4 DTSC Permit Project Planning Chart(blank)
4.0-5 DTSC Permit Milestone Checklist
4.0-6 DTSC Permitting Workload Standards

List of References: