

Project Charter

Project Name: Air Management Stationary Source Referral Process

Date Chartered: September, 2012

Expected Completion Date: June 30, 2013

Co-Team Leaders: Rick Wulk and Connie Antonuk

Team Goal/Mission:

The purpose of the team is to evaluate and define an efficient process for making Air Management HPV and non-HPV enforcement cases referral recommendations that assure the Secretary's Office has adequate, timely information, including information from the source involved, to make consistent referral decisions.

The team will implement improvements that accomplish the following:

1. Minimize the DNR staff time spent on referral of individual enforcement cases that are not ultimately supported by management.
2. Evaluate and streamline the number of individuals required to sign off on referrals.
3. Meet the requirements of the HPV and non-HPV enforcement process by improving program performance in relation to the EPA guideline that violations be addressed within 270 days and the current administration's guideline of a violation being addressed within 12 months of the discovery of the most recent violation, as applicable. This includes establishing timeframes for individual steps within the process that will enable the overall EPA guideline as well as the administration's guideline, to be achieved.
4. Develop the AM process in such a way that that it could be implemented as a pilot, and potentially be applied to other areas of the Department, as appropriate, at a later date.
5. Develop a roll-out plan detailing the new process for compliance and enforcement staff.
6. Data Safety: Use tools within the SharePoint environment to apply staff permissions at the case level to maintain data security.

Measure(s) to be used to determine success:

How will we quantify our progress?

1. Use AM referral data from 2005-2012 as the baseline for the process (Excel spreadsheet containing WARP data for this timeframe is available).
2. Within 6 months of complete implementation of the pilot, over 75% of AM referrals have referral letters signed within 270 days of day zero (currently <20%) and within 12 months of the discovery of the violation.
3. Within 1 year of complete implementation, 100% of AM referrals have referral letters signed within 270 days of day zero and within 12 months of the discovery of the violation.

Team Members:

Rick Wulk (Co-Team Leader) - NER

Connie Antonuk (Co-Team Leader) - NOR

Jill Zalesny - NOR

Neal Baudhuin - NOR

Deb Roszak - SER

Maria Hill - SCR

Michelle Farley - NER

Issues to be addressed:

What problems or opportunities will the team solve?

1. Since 2005, the average length of time required for Air Management cases to be referred to DOJ is 474 days (“day zero” to referral date). During this time, 10 of 52 referral cases (<20%) met the EPA guideline of 270 days (EPA HPV Timely and Appropriate guidance).
2. Organizational changes within the EE program (two new Regional EE Supervisor positions) and the AM program (new Deputy Bureau Director position) have recently occurred. The referral process needs to take these changes into account.
3. Currently there is no timeline for sources to provide input on a referral case – it can occur at any point up until the case is sent to DOJ. It would be more efficient to receive all input from sources early in the referral case development and sign-off process.
4. The EE Program is developing the capability (currently using SharePoint) to review referral packages electronically. This must be included as part of the AM referral sign-off process.
5. EE is considering conducting an enforcement survey across all Department programs. If timing allows, the results of that survey should be considered as part of this effort.

Expected Results:

What will be in place when we are done?

1. A streamlined and well-defined process, taking into account current lines of authority within the EE and AM programs, is implemented consistently statewide.
2. The process maintains the enforcement conference step (or something similar) to afford sources a clearly defined opportunity to provide information regarding facts of the case to staff at the level within the agency the source feels is necessary.
3. There are established timeframes for individual steps within the process that will enable the overall EPA 270 day guideline and the administration’s 12 month guideline to be achieved.

Support/Resource People:

Bart Sponseller, Air Management Bureau Director

Martha Makhholm, to provide WARP compliance and enforcement data

Bill Baumann, Compliance, Enforcement & Emission Inventory Section Chief

Colin Duffy, Compliance & Enforcement Team Leader

Responsibilities and Boundaries:

What areas will the team look at and what areas will the team NOT look at?

1. The effort will focus on the referral process for permit violations involving stationary sources. Enforcement of violations in other program areas are not included in this effort.
2. The team will evaluate the process for cases that are being referred; the HPV non-referral process is excluded from this evaluation.
3. The team may clarify with DOJ how additional violations can be added to an enforcement case already referred to DOJ; this project will not evaluate or propose changes to any DOJ process.
4. The team will **not** evaluate staffing levels in either the AM or EE programs.
5. Obtaining the voice of the customer.



DNR Lean Project – Air Management Stationary Source Referrals Final Report

Project Name: Air Management Stationary Source Referrals

Project Team Leaders: Rick Wulk, Connie Antonuk

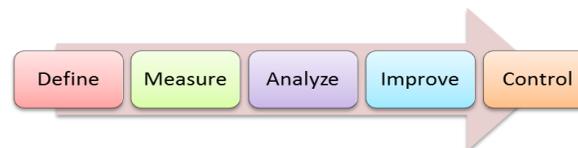
Project Purpose: The purpose of the team was to evaluate and define an efficient process for making Air Management HPV and non-HPV enforcement cases referral recommendations that assure the Secretary's Office has adequate, timely information, including information from the source involved, to make consistent referral decisions.

Project Team Members: Neal Baudhuin, Michelle Farley, Maria Hill, Deb Roszak, Jill Zalesny

Summary of Improvements:

Time was decreased between violation detection to referral to Department of Justice [past data which indicated an average of 474 days has been reduced to 192 days, a total reduction of 282 days)

- Pre-referral process improvements
 - Call participants
 - Scheduling
 - Pre-referral memo content
- Developed a “touch, task and time diagram”, specifically called the Air Management Stationary Source Referral Process Diagram, which will be the Standard Operating Procedures, to clarify who, what and how long it should take to complete defined tasks
- Developed an enforcement path task worksheet for Air Management and EE staff to assist staff in timely enforcement actions
 - Replaces the AWARE Division Enforcement Process for Air Program
- Performance Goals and/or Job Objectives for Air and EE staff
- Training Plan
- Implementation of EE Case Management SharePoint site
 - Routing and review of documents
 - Staff accessibility
 - Electronic documents
- Improved customer outreach at the Notice of Violation level to better explain the enforcement process
- WARP key events will be developed to track tasks in referral process task worksheet



Project Results:

Goal	Baseline	Target	% reduction from baseline to target	Objective	% reduction from baseline to objective	Goal Met?
Reduce DNR staff workload by improved efficiency	Baseline data wasn't available	Air engineer = 94 days Air supervisor = 12 days EE Specialist = 94 days EE Supervisor = 13 days	Baseline data wasn't available	Air engineer = 94 days Air supervisor = 12 days EE Specialist = 94 days EE Supervisor = 13 days	Baseline data wasn't available	TBD
Reduce the number of touches by DNR staff	Baseline data wasn't available	28 touches by regional Air and EE staff, 4 for Central office	Baseline data wasn't available	28 touches by regional Air and EE staff, 4 for Central office	Baseline data wasn't available	TBD
Streamline sign off on referrals	13 sign-offs	9 sign-offs	31%	9 sign-offs	31%	Yes
Reduce time to issue referral to DOJ	519 calendar days	192 calendar days	63%	< 365 calendar days and EPA Day 270	30%	TBD
Develop training plan for EE and AM staff <ul style="list-style-type: none"> • HPV training as needed for Air staff • SharePoint training for EE and Air staff 	No training	SharePoint training to be conducted by September 1, 2013	NA	SharePoint training to be conducted by September 1, 2013	NA	TBD

Goal	Baseline	Target	% reduction from baseline to target	Objective	% reduction from baseline to objective	Goal Met?
Improved Data Safety	Data, including data considered confidential, was shared in an insecure manner	All data shared via secure SharePoint site	NA	All data shared via secure SharePoint site	NA	TBD

Amount of time saved in days if new referral process is followed: Between 174 and 327 days

Project Cost:

	Hours	Dollars
Project Team Leader		\$
Project Team Members		\$
Meeting Costs		\$
Improvement Costs		\$
Total		\$

Recommendations for Future Code/Statute Changes:

- Changes to statutes to allow for Administrative Penalty Order Authority
- Change to code to allow for submittal of data written and/or electronically at the request of the Department

Lessons Learned:

- Team members' workplans need to be adjusted to allow full participation in workgroup activities.
- Let the process work...don't let the team jump to the decisions without gathering the data...you may only solve half of the problem.
- Face to face meetings are invaluable, use calls sparingly.
- Data collection is important, but capturing the essential data is sometimes a difficult task.
- Team members and leaders are important to the working climate for overall project success (staff should feel safe to express opinions).
- Leaders need to keep the project focused.
- Geographic considerations are important for staff travel time. This directly relates to participation level.