

# 2002 Air Operating Permit Satisfaction Survey

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## **EXECUTIVE SUMMARY**

This report presents the results of a 2002 survey of air operating permit recipients (applicants). Sociologists in the Bureau of Integrated Science Services conducted the study to measure applicants' satisfaction with the Bureau of Air Management's permitting process. The survey paid particular attention to applicants' views on how quickly DNR staff members answered their questions and to how well staff resolved problems that arose. The study itself is part of the Department of Natural Resources' larger Strategic Implementation Plan (SIP) which calls on agency programs to monitor the satisfaction of their customers.

### **The Study**

The results presented in this report are drawn from a booklet-style 12-page mailed questionnaire. The survey was conducted in May and June 2002 and was sent to facilities that had received an air operating permit in the 2 years prior to the survey. Research scientists developed the questionnaire using information gathered from five focus groups conducted with applicants who had received an air operating permit. This survey achieved a response rate of 83 percent.

### **Principal Findings**

Applicants' satisfaction with the air operating permitting process can be divided into three parts: satisfaction with the DNR staff who helped them, satisfaction with the application process, and satisfaction with the permit that resulted from this process.

The survey discloses that applicants are highly satisfied with the performance of the DNR staff who processed their permits. Respondents uniformly describe staff members as courteous, knowledgeable, and helpful. Most stated that they received timely answers to their questions and that staff worked effectively with them to resolve problems. These findings are consistent both with the focus groups and with prior survey work in this area.

Respondents were less satisfied with the application process. Some are concerned that the process takes too long and costs too much. Indeed, years can elapse between the initiation of an application and the final receipt of a permit. Such a drawn-out process means that both agency and applicant can lose key staff members who prepare or review the permit. The fitful nature of the process means that applicants must continually go back and review and relearn their permit.

Some applicants also expressed concerns about their final permit. It typically requires that they gather and report additional data. Thus, recipients find themselves buying new equipment or paying staff to collect, record, and report additional data. They are not,

however, convinced that the stepped up record keeping will result in enhanced environmental protection.

Despite these difficulties, the levels of satisfaction reported in this survey were surprisingly high. Strong majorities describe themselves as satisfied both with the air operating permit application process and with their permit.

The next page provides a quick snapshot of survey results and their relationship to the agency's SIP objectives.

The 2002 Air Operating Permit Program Survey provides baseline measurements of customer satisfaction, DNR staff resolution of problems, and staff response times to questions.

ISSUE	2002 BASELINE	RELATIONSHIP TO GOAL
	Percent Satisfied*	Difference between baseline and 85% satisfaction
<b>Satisfaction with DNR staff who processed permit</b>		
Overall satisfaction with DNR staff who processed permit	99%	+14%
Courtesy	99%	+14%
Effort	97%	+12%
Helpfulness	96%	+11%
Accessibility	96%	+11%
Knowledge of air permit rules	95%	+10%
Knowledge of facility	88%	+3%
Knowledge of industry	85%	0
<b>Satisfaction with aspects of application process</b>		
Flexibility in permit negotiations	83%	-2%
Clarity of application instructions	78%	-7%
Dispersion modeling	74%	-11%
Amount of information required to submit	69%	-16%
Ease of application process	66%	-19%
Time to get permit	60%	-25%
<b>Satisfaction with attributes of air operating permit</b>		
Ease of identifying changes (renewals)	80%	-5%
Permit conditions fair and consistent	84%	-1%
Ease of understanding permit	80%	-5%
<b>Satisfaction with inspection visit performance attributes</b>		
Overall satisfaction with inspection visit	98%	+13%
Courtesy	99%	+14%
Helpfulness	99%	+14%
Fairness	97%	+12%
Provision of information	96%	+11%
<b>Satisfaction with how DNR staff responds to problems</b>		
Overall satisfaction with how staff addressed problem	81%	<b>Goal: increase ability to gently let down disappointed customers by 5% each year through 2007.</b>
Respectful manner of staff response	100%	
Courtesy of staff	99%	
Adequate number of staff to respond to problem	92%	
Effort of staff to respond to problem	81%	
Problem addressed in timely manner	77%	
Got most of what was needed	53%	
<b>Staff response time to questions. These percentages show those respondents who received responses to their questions when they expected or sooner.</b>		
Those who received a response when they expected or sooner	84%	<b>Goal: decrease response time by 20% by 2005.</b>
Expected immediately, received immediately	92%	
Expected same day, received same day or sooner	83%	
Expected 2 days - < 1 week, received then or sooner	87%	
Expected 1 – 2 weeks, received then or sooner	67%	

\*Percent 'very satisfied' or 'satisfied'.



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## APPENDIX

Appendix A DNR Strategic Implementation Plan Objectives



## **I. INTRODUCTION**

### **Purpose**

This report presents the results of the 2002 survey of air operating permit recipients. The study was conducted to measure recipients' satisfaction with the operating permit process. The survey also explored problems that recipients experienced and how well (or poorly) DNR staff resolved those problems and measured how quickly DNR staff responded to respondents' questions.

### **Background**

This study was undertaken in response to the DNR's Strategic Implementation Plan (SIP). The SIP calls on the agency to monitor customer satisfaction, to measure response times to customer questions/concerns, and to measure how well DNR staff works with unhappy customers. See Appendix A for specific SIP objectives.

The air operating permit program was selected as a pilot test of the DNR's ability to gather this information. Facilities that receive air operating permits experience intense interactions with DNR staff members, frequently experience problems, and often have questions related to the program. This environment provides an ideal situation in which to explore the issues raised by the SIP. Additionally, the Bureau of Air Management itself was already working with researchers on a qualitative evaluation of the program in the form of focus groups, one being conducted in each of the five DNR regions.

### **Methods**

The results presented in this report are drawn from a mailed questionnaire of air operating permit recipients. In May and June 2002, all Wisconsin facilities who received an air operating permit between May 2000 and May 2002 were surveyed. The 12-page booklet-style questionnaire was sent to the person in each facility that had primary responsibility for obtaining the permit. Standard mail survey procedures were used for three mailings: a cover letter with survey, a reminder post card, and a second letter with survey to non-respondents. These methods produced an 83 percent response rate (136 applicants).

In developing the questionnaire, researchers used information gathered from focus groups, interviews with air program staff, and a review of a review of survey instruments used by other states<sup>1</sup>. As previously noted, researchers worked with Bureau of Air Management staff to conduct five focus groups with operating permit recipients. One group was conducted in each of the agency's major administrative regions. Such groups allow participants to describe their experiences in their own words. This qualitative work

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<sup>1</sup> Surveys from Maine, Oklahoma, and Delaware measure satisfaction with staff courtesy, timeliness, knowledge, and quality of service. Surveys from Missouri, North Carolina, and Vermont measure satisfaction with the permitting process.

is a necessary first step to understanding customer satisfaction. The five groups provided a basis for understanding customer concerns and creating/designing a questionnaire. Additionally, focus group information can provide context and some explanation of survey results. Italicized quotations from the focus groups are used throughout this report.

## **Report Layout**

This report is divided into three sections, the first being this Introduction. Section II discusses the survey results and Section III focuses on how the survey addresses the DNR's SIP objectives.

## **Acknowledgments**

We wish to extend a hearty "Thank you" to the Bureau of Air Management for opening themselves up to the scrutiny that self-evaluation can bring. We particularly wish to thank Bureau Director Lloyd Eagan for having the courage to listen to the public's opinion of the program and Eileen Pierce for allowing us to participate with her focus groups and for providing guidance to the intricacies of the program. Lastly, we wish to thank Dennis Koepke, Jeff Hanson, Ralph Patterson and Keith Pierce (all of the Bureau of Air Management) for providing the information necessary to complete this research.

## II. RESULTS

This section presents the results of the air operating permit survey. It is organized as follows:

- Applicants' satisfaction with staff
- Satisfaction with the permit application process and with the final permit
- Application process and permit problems
- Problem resolution
- Experiences with inspection visits and permit writer site visits
- Perceptions of the timeliness of DNR staff response to questions and concerns
- Respondent background
- Respondent suggestions for program improvement

We first present results in summary fashion. The "at a glance" summary is followed by a more detailed report of results.

### **Results at a glance:**

#### **Satisfaction with DNR staff**

Survey results indicate that air operating permit applicants are very satisfied with DNR staff performance. They are most satisfied with personal DNR staff attributes such as courtesy and effort. Although satisfaction is still high, applicants are less satisfied with staff's knowledge of their facilities and of their industries. Of all the staff attributes discussed, applicants say that staff knowledge of air permit rules is by far the most important. Staff helpfulness and knowledge of facilities and industry are also important.

#### **Satisfaction with permit application process and permit**

Most applicants are satisfied with various aspects of the permit application process, although satisfaction levels are lower than for DNR staff. Applicants appreciate flexibility in permit negotiations and are satisfied with the clarity of application instructions. Although applicants identified 'ease of application process' as one of the most important application process attributes, they rate it among the lowest satisfactorily. Not surprisingly, renewal permit applicants are more satisfied than original permittees are with the ease of the application process. As for the permit itself, most applicants are satisfied with the fairness and consistency of permit conditions and with the ease of understanding their permit.

## **Problems related to the application process and the permit**

Almost one half (48%) of respondents did not identify any major problems associated with the permit application process nor with the permit itself. However, many identified minor problems. The most frequently identified major application processing problems include time and costs associated with processing the permit and the amount of information required for submittal with the application. The most frequently identified major permit-related problem identified is additional record keeping requirements. Most applicants who contacted the DNR were satisfied with how DNR staff addressed their specific problem.

## **Satisfaction with site visits**

Most applicants reported facility visits by DNR staff. They consider site visits by DNR permit writers more important than DNR inspection visits. Applicants who reported compliance inspection visits are satisfied with the performance of DNR inspectors.

## **Staff response to questions**

DNR staff are timely in their responses to applicant questions. In fact, just over four fifths (84%) of applicants said that DNR staff responded to their question in the time they expected or sooner.

## **Suggestions for improvement**

Most written suggestions for how DNR staff can improve the process involve simplifying or streamlining the process in some way.

## II.A. Applicants' Satisfaction with DNR Staff

### Facilities are satisfied with the DNR staff they worked with during the permit application process.

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We asked applicants about their experiences with DNR staff members during the permit application process. They voiced overwhelming satisfaction, with 99 percent describing themselves as satisfied or very satisfied with the overall performance of the DNR staff they worked with most during the application process (see Table 1). These results are consistent with those of the focus groups. Although applicants were highly critical of certain portions of the permitting process, they often had warm words of praise for DNR staff members.

**Table 1. Overall satisfaction with DNR staff who processed permit**

	Percent
Very satisfied	49%
Satisfied	50
Dissatisfied	1
Very dissatisfied	--

Focus group quotations:

Staff are helpful

*... there's problems and everything else, but I do want to say again that the staff was very helpful, very interested in making the whole process work and availability and things of that nature.*

*But the people we worked with were really great.*

Staff are professional

*And I think they've been very professional.*

Staff are knowledgeable

*The Wisconsin DNR is, in my opinion, way up, as far as, from my experience, the technical ability of the people who are not only issuing the permits, but the engineers and the enforcement engineers. You know, they're on top of stuff.*

In addition to asking applicants about their overall satisfaction with DNR staff, we also asked them to rate the performance of the DNR staff they worked with most often during the application process. Figure 1 and Table 2 show respondents' satisfaction with specific aspects of staff performance. They give staff high marks for courtesy, effort, accessibility, and air permit knowledge. They are somewhat less satisfied with DNR staff's knowledge of their industry and of their facility. Even here, however, more than four-fifths described themselves as 'very satisfied' or 'satisfied'.

**Figure 1. Satisfaction with DNR staff who processed permit**

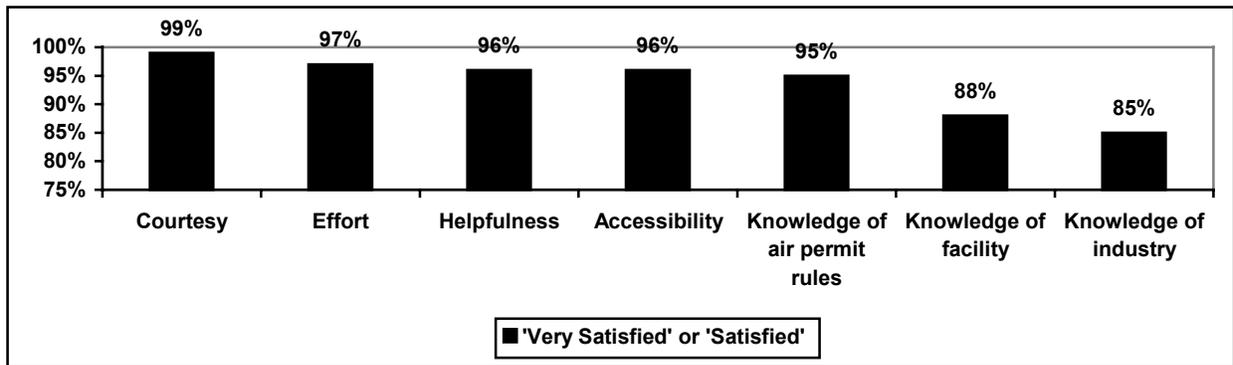


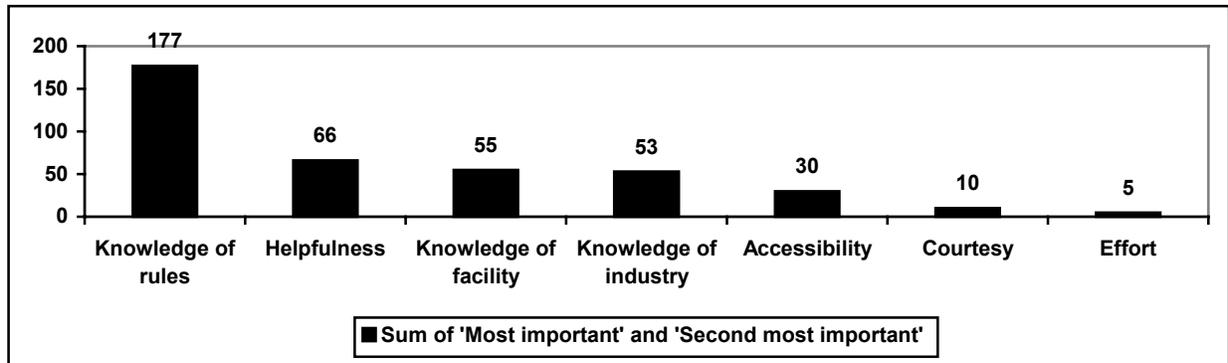
Table 2 below shows more detailed satisfaction ratings of each of the staff performance attributes pictured in Figure 1 above.

	Percent
<b>DNR staff courtesy</b>	
Very satisfied	59%
Satisfied	41
Dissatisfied	--
Very dissatisfied	--
<b>DNR staff effort</b>	
Very satisfied	49%
Satisfied	49
Dissatisfied	1
Very dissatisfied	1
<b>DNR staff helpfulness</b>	
Very satisfied	55%
Satisfied	42
Dissatisfied	2
Very dissatisfied	1
<b>DNR staff accessibility</b>	
Very satisfied	46%
Satisfied	50
Dissatisfied	3
Very dissatisfied	1
<b>DNR staff knowledge of air permit rules</b>	
Very satisfied	52%
Satisfied	44
Dissatisfied	2
Very dissatisfied	--
Don't know	2
<b>DNR staff knowledge of facility</b>	
Very satisfied	21%
Satisfied	68
Dissatisfied	7
Very dissatisfied	--
Don't know	4
<b>DNR staff knowledge of industry</b>	
Very satisfied	22%
Satisfied	63
Dissatisfied	9
Very dissatisfied	1
Don't know	5

## Permit applicants place a premium on DNR staff knowledge.

The questionnaire asked applicants to identify the two most important traits that DNR staff should have. The most important attribute is 'knowledge of air permit rules' (Figure 2). After that, respondents' answers suggest that they value helpful staff members who have an understanding of their facility and of their industry.

**Figure 2. Importance (most and second most) of staff attributes**



Focus group participants discussed the importance of DNR staff knowledge, especially staff knowledge of their facilities and a working knowledge of their industries. They said that a lack of staff knowledge leads to considerable time wasted (and thus costs incurred) in correcting errors and poor assumptions during the permitting process.

*But probably the one issue that caused us a fair amount of time during the application review process was that the review engineer was not familiar with our operations. And in many instances they were proposing conditions in draft permits that could not be met because the process would just not operate that way...*

*We need to see those kind of people [those with industry knowledge] so that we don't have to spend hours and hours of time explaining to somebody, you know, this is how it really works.*

## **Applicants commended the DNR staff they worked with for their helpfulness.**

The questionnaire provided space for applicants to comment on the DNR staff they worked with. About one-third (35%) volunteered some comment. Most comments were positive. They complimented staff for helping them through the process, for their effort and professionalism, and for their consistency. Some comments were more critical. These respondents drew attention to the time it took to complete the application, to problems with communication, and to the need for consistent application of air rules. Table 3 shows the general categories of respondents' comments.

**Table 3. Categories of written comments about DNR staff interactions**

	<b>Percent<sup>1</sup></b>
Helping facilities through application process	46%
Courteous, professional, effort	23
Consistent application of rules	15
Length of time to process permits	8
Flexibility	4
Lack of communication	4
English a problem	4
Other	8

<sup>1</sup> Percentages do not add to 100 because comments could be included in more than one category.

Some written comments are included below.

### **Helpfulness of DNR staff**

Some respondents identified specific DNR staff members, who were especially helpful, while others wrote about helpfulness in general. Respondents also wrote about staff who listened and explained details, the importance of staff accessibility, and the importance of DNR staff knowledge of their operations.

#### Positive comments about staff

*She was very good at listening to our concerns and questions and explaining everything to us.*

*SE District staff a generally very helpful.*

#### Importance of DNR staff help

*I am new to this process. I had no one to train me or explain any of our needs. I could not have done the draft without the help of the DNR. I still do not understand what much of the data means.*

#### DNR staff not helpful

*Hard to reach – Hard to talk to, not very forth coming with the information we needed.*

Facility knowledge makes process easier

*The process seems to be easier when the review engineer has knowledge of the process at the facility. The site visits also seem to help.*

**Courteous, professional, effort**

This is a catch-all category for positive comments about staff behavior.

*Prompt, courteous, flexible.*

*Interaction[s] were very professional.*

*I believe that [staff name] went above and beyond his normal duties to assist us with our needs.*

**DNR should apply rules consistently**

Several respondents said that rules should be applied consistently. Their experiences suggest that DNR staff members are not consistent in their application of rules.

*... We were surprised that so many of the specific requirements in the permit were based on the permit engineer's and compliance engineer's own opinions versus specific regulatory requirements. These engineers were generally not aware of the types of compliance demonstration conditions that had been required for other similar facilities. We expected more consistency statewide.*

*Good job – my issue is that there are some inconsistencies in interpretation between DNR people – and what's allowed in some permits – but not in others.*

*Permit writers vary greatly in knowledge and helpfulness.*

**Applicants believe that local DNR staff members are more knowledgeable of their facilities.**

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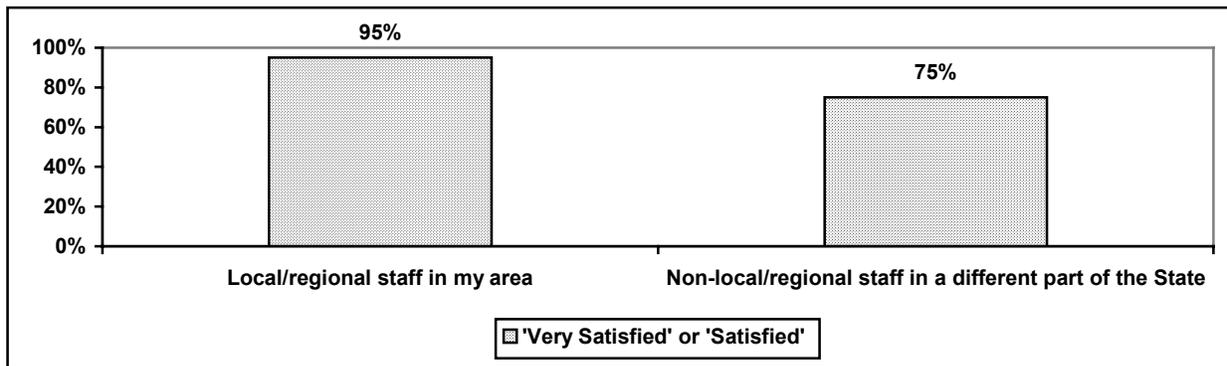
We asked respondents to identify whether they worked most with local/regional staff in their area or local/regional staff in a different part of the state. Most applicants worked with local or regional staff from their area during the application process (Table 4).

**Table 4. DNR staff that facility worked with most in preparation of permit**

	<b>Percent</b>
Local/regional staff in 'my' area	87%
Non-local/regional staff in a different part of the state	13

Not surprisingly, those applicants who worked most with DNR staff local to them were more satisfied with staff's knowledge of their facility than were those who worked with non-local staff. Figure 3 shows that 95 percent of those applicants who worked most with local/regional staff from their area were satisfied with staff knowledge of their facility, as opposed to 75 percent of those applicants who worked with non-local DNR staff. Comments from focus groups participants support these results. Many talked about the importance of DNR staff getting to know them and their facilities.

**Figure 3. Satisfaction with knowledge of facility, by staff worked with most**



Focus group quotations:

Familiarity with industry and face to face contact

*I think for us being a small business we kind of benefited because there are a lot of other [industry type] operations in the area here, so the local permit writer that we have here is very familiar with our type of operation and it was easy for him to come in and help us through the process.*

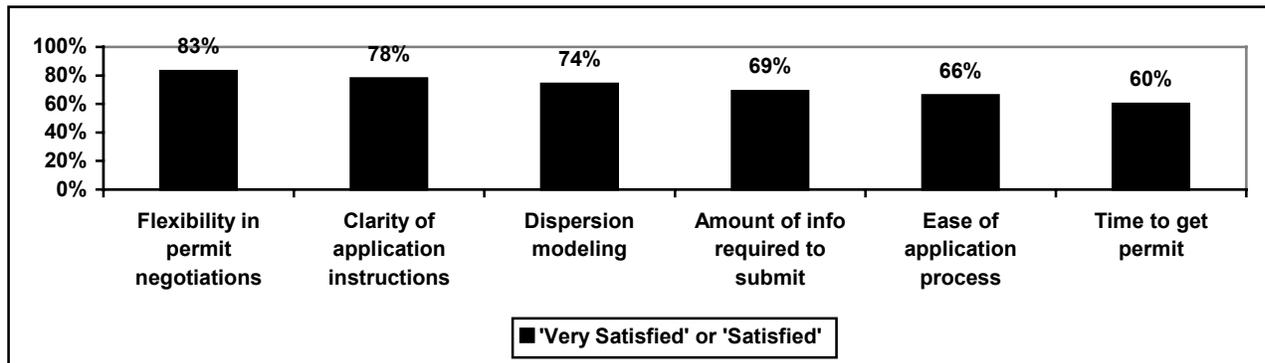
*The working relationship is the biggest thing you have to get going with someone at the DNR. Face to face is definitely better than phone calls so you know who you're talking to.*

## II.B. The Permit Application Process

### Most respondents are satisfied with aspects of the application process.

The questionnaire asked respondents to indicate satisfaction with several aspects of the application process. Three-fifths or more respondents are 'very satisfied' or 'satisfied' with these aspects. Respondents are most satisfied with 'flexibility in permit negotiations' (83%) and least satisfied with 'time to get permit' (60%) and the 'ease of application process' (66%). See Figure 4.

**Figure 4. Satisfaction with aspects of application process**



Focus group discussions highlighted where permittees have problems with the application process. The most frequent problems raised were associated with application processing time, and the complexity of the process.

The unduly long permit processing time is the aspect with the lowest satisfaction level in Figure 4 above. Focus group participants frequently talked about the time it took, often several years, to process their permits. The extended application processing time results in excessive costs (for consultants and facility personnel time). Additionally, applicants said they were forced to modify/update their applications because their processes changed before their permit was completed.

Focus group quotations:

### **Long process**

#### Unduly long process

*It was quite a drawn out process with a lot of dead time, it seemed like, and then things moved very quickly.*

*The fact that we had a consultant in '97, that over a period of 6 months working with us and the DNR, came up with the actual application, and then it just sat. And there was a loss of continuity. By the time it picked up again in 2000,*

*basically whatever knowledge I had prepared self for is gone. And it was starting back to square one in my mind.*

Long process meant changes to application

*Because it was such a long time between the submittal and the permit. Everything had changed. So we had to redo everything in the calculations.*

**Process complexity**

Focus group participants also discussed the complexity of the permit application process. It is not a simple process. For example, participants talked about the need for consultants because it is so complex. Additionally, participants talked about the need for a paper trail so that they are always aware of their permit's status during the process.

Need consultant because of complexity

*... A company our size would have real difficulty going through this permitting process without the help of a environmental attorney and consulting firm. Because you just don't have people on staff that have the ability to analyze all the information and put it in a report form or to get through the application process.*

*We threw our hands up in the air and said there are terms in there we couldn't even pronounce. So we knew we were going to a consultant.*

Need paper trail

*One of the problems is that there is never a paper trail when you work with the DNR in your permitting. ... All I ask is please send paper. The timeline. What you're working on. So we know where you're at. Because it's phone calls back and forth to consultants. "Do you know where they're at? Is this coming?" Sometimes decisions are made on the other end. They tell you something on the telephone. When you get your permit it's not what they told you.*

Poor communication/coordination

*Not really knowing where we are in the status of our permit renewals always been a question. Sometimes you have to make phone calls to find out what the status is. And you would expect, maybe, a little bit better communication as far as status updates or at least knowing where you are in the cue.*

**Costs**

Applicants are also concerned about air permit application costs. The survey did not ask respondents' satisfaction with application costs, however many said that costs were a problem later in the survey (see section II.D). Dispersion modeling, consulting fees, and overall application processing time drive up the costs.

Application process is costly

*We spent probably over a year going through modeling exercises, well over \$50,000 in consulting fees.*

*That cost us \$7,000 back in the early 90's. I don't know if it's changed a lot. Right here I have a renewal of that permit which wasn't too bad. That cost us \$3,500 just to renew. Somebody starting up a new business and has to go through that – I'd tell them to go to a different state or something because that was a nightmare.*

**Renewal permittees are more satisfied with the ease of the process.**

Renewal permit recipients are slightly more satisfied with the ease of the application process than are original permit recipients. Table 5 also shows that they are more satisfied with the amount of information they are required to submit for their application. We would expect these results. Permittees receiving a renewal permit have already been through the process and are more familiar with it. Also, comparatively little additional information is needed for the renewal application if a facility's processes have not significantly changed since the original permit.

**Table 5. Satisfaction by whether original or renewal permit recipients<sup>2</sup>**

	<b>Original</b>	<b>Renewal</b>
	<b>'Very Satisfied' or 'Satisfied'</b>	
Ease of application process	61%	79%
Amount of information required to submit	63%	79%

Focus group participants also said the renewal process was shorter and more straightforward.

Painless renewal process

*They came out for four- or five-hour visit, toured our record keeping, walked the facilities. We had it written up, the draft came through, which was nice. We had a couple of comments on the draft that we sent back and those were incorporated. From our standpoint, it was pretty much painless.*

Straightforward renewal process (less information needed for submittal)

*The renewal process, I thought, went, was very easy for us because we only had to submit the changes. We didn't have to go through a whole iteration of the permit. There was a letter with a few forms. So that was pretty straightforward for us.*

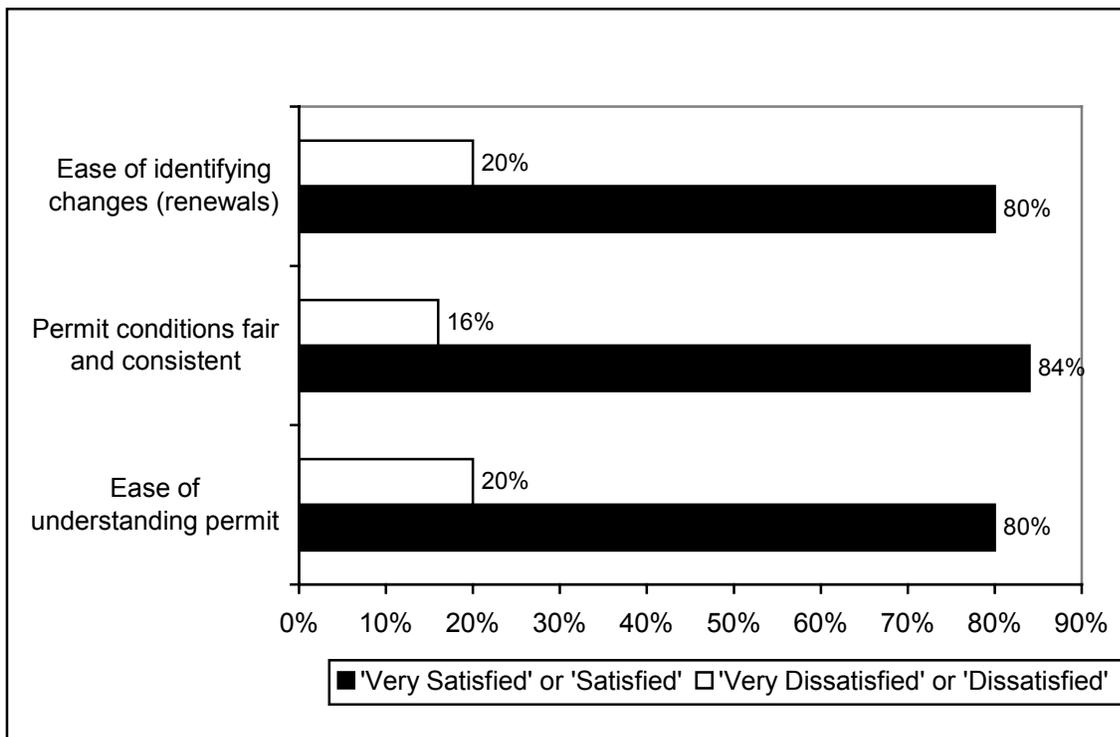
<sup>2</sup> There are no significant differences in satisfaction between the two permit types for the other permit application attributes included in the survey.

## II.C. The Permit

### **Permittees express high levels of satisfaction with selected permit attributes.**

The survey asked three questions about the permit itself. The questions address the ability to understand the permit and permit consistency. Participants in several of the focus groups talked about the ease of reading and understanding the new, tabular permit format and the difficulties associated with identifying changes to renewal permits. Roughly four-fifths of respondents were 'very satisfied' or 'satisfied' that their permit conditions were fair and consistent (84%) and with the ease of understanding their permits (80%) (see Figure 5). Of those who received renewals, four-fifths (80%) were satisfied with the ease of identifying changes to their permits.

**Figure 5. Satisfaction with attributes of the permit**



The air operating permit focus groups suggested that “fair and consistent” permit conditions are those in which air rules are applied consistently to all facilities. Focus group participants disagreed over the level of permit consistency both within Wisconsin and compared to other states. Many participants were unsure about the level of consistency, not having compared their experiences to those of others. Of those who commented on in-state consistency, several believed that conditions are fair and consistent. Those who said they are not consistent suggested that subjective permit writers are the problem or that conditions are more stringent in southeast Wisconsin.

Participants agreed that application of air rules varies from state to state. However, their perceptions of Wisconsin's application of the rules varied from being more lenient to being more stringent than other states.

### **Consistency within Wisconsin**

Consistent. Many focus group participants said that the air operating permit process in Wisconsin is consistent.

*Between our industries if you look at the [industry type] across WI I'd say it's fair.*

*To the best of my knowledge it's consistent and fair.*

Inconsistent. Other focus group participants said that the process is not consistent, largely because they think that permit writers interpret the laws differently.

*So you know there is a degree of subjectivity that the writers have. Which is going to lead to the variability.*

*And as you work with those different people [permit writers] they also interpret the laws a little bit differently also. ... Sometimes I think they like to see how far they can push you.*

*... permit requirements for control devices on power boilers, electrostatic precipitators and scrubbers. There appears to be inconsistent application of those requirements in the state.*

Southeast WI at a disadvantage. Permit applicants who live in southeast Wisconsin, a non-attainment area, say they are at a competitive disadvantage because their limits are stricter than are those of competitors in other parts of the state.

*But I know we're in a tough business. We have 153 competitors in this area. The thing is though, that most of them are not in a non-attainment area, so they are at a 100-ton level where we are at a 25-ton level. So we have to be a lot stricter. We have to keep more records, they don't have to do those things.*

*The biggest difference that I can see is between the attainment and the non-attainment areas. And then you start talking about competitive nature. There are things that we can do, there are certain commodities and products that we can do in one plant that we can't even talk about doing in one, just because of the location. And the process isn't that much different. Before the permit came along there was not a problem.*

## **Comparison between Wisconsin and other states**

### Wisconsin is more restrictive

*Comparing [with similar facilities in other states] we've got the most restrictive operating permit of the three. ... We do have more monitoring requirements and record keeping requirements than those sister mills.*

*... I talk to different commissioners from all parts of the state. And they have the same requirements that we do but different regions in the Midwest are a lot more lenient. Outside of the state is a lot more lenient.*

### Wisconsin is average

*... [environmental manager from headquarters] thought we were very middle of the pack from what he has seen. As far as WI, he said if you get into California and certain other states that go into constant stack monitoring where it's a requirement all the time, as far as how other permits are written, he believes that WI is very middle of the pack. ... He believes us to be very parallel to what he interprets Texas.*

### Wisconsin is more lenient

*We've got factories doing the same type of production in many states across the country. So we get to compare notes a lot of times with the regulatory issues. We in [city name] actually enjoy some of the loosest limits within our corporation.*

**Desire for personalized explanations of permits is mixed.**

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Just over one-half of respondents (57%) said that DNR staff explained their permit to them (see Table 6). Applicants who did not receive staff explanations were divided as to whether they would want one. Forty seven percent said they would have liked a DNR staff person to explain their permit to them. Fifty three percent would not want such an explanation.

**Table 6. Explanations of air operating permit**

	<b>Percent</b>
Permit was explained by DNR Staff	57%
If permit was not explained, would have liked an explanation	47%

Some focus group participants said they wanted DNR staff to explain their permits.

*Because I really think that when you get your permit it shouldn't just be mailed to you. There should be a section at the very end that says "Hello, we'd like to meet with ... and we'd like to explain this to you. And that's not done. It's almost like it's anti-business. I really have that feeling that they don't really care if there's a woodworking business in northern WI. There's your permit. You either do it or not. We're not going to help you with it.*

## II.D. Permit Problems

### **Most respondents did not have a problem with most application process issues.**

The survey asked applicants how much of a problem, if any, they had with selected issues related to the air operating permit application process and with the permit itself. Table 7 focuses on the application process. For all but three of the issues included, roughly two-thirds (65%) or more of respondents said they did not have a problem. More respondents identified the three remaining issues as a “major problem” than any other issue. The shaded areas in Table 7 reflect these major problem areas. The top three issues that respondents identified as major problems are “time it took to get permit” (22%), “costs of getting permit” (16%), and “amount of information required to submit” (15%).

**Table 7. Problems with air operating permit application process**

	<b>Major Problem (Percent)</b>	<b>Minor Problem (Percent)</b>	<b>Not a Problem (Percent)</b>
Application was lost	2%	3	95
Public comment draft different	1%	9	90
Disagreements over modeling	3%	13	84
Disagreements over which rules apply to facility	6%	15	79
Errors in draft permit	10%	25	65
Time it took to get permit	22%	31	47
Costs of getting permit	16%	38	46
Amount of information required to submit	15%	52	33

The three permit application process issues that most respondents identified as major problems are also their top three greatest issues of concern. Table 8 shows the numbers of applicants who identified each attribute as greatest or second greatest concern. The three greatest issues of concern are highlighted.

**Table 8. Permit application problems of greatest and second greatest concern**

	<b>Greatest and 2<sup>nd</sup> Greatest Concern (Sum)</b>
Time to get permit	45
Cost of getting permit	34
Amount of information required to submit	28
Disagreements of which rules apply	13
Errors in draft permit	9
Disagreements over modeling	5
Public comment draft was different	4
Application was lost	3

**Most respondents identified a problem related to the permit.**

Respondents had considerably more problems with issues related to the actual permit than with issues related to the application process. Table 9 shows that roughly one-half or more respondents reported either a major or minor problem with each of the permit-related issues except for one. Thirty seven percent of respondents said that “emissions limitations in permit” was a major or minor problem. More respondents had a problem with the additional record keeping required by the permit (the shaded area in Table 9) than with any other issue. For all of the issues, most respondents who reported a problem considered their problems to be minor.

**Table 9. Problems with air operating permit**

	<b>Major Problem (Percent)</b>	<b>Minor Problem (Percent)</b>	<b>Not a Problem (Percent)</b>
Emissions limitations in permit	7%	30	63
Increase in frequency of collecting monitoring data	11%	41	48
Permit compliance costs	13%	43	44
Ease of understanding permit	8%	52	39
Reporting required by permit	13%	48	39
Additional record keeping required by permit	17%	54	29

Table 10 shows the sum of respondents’ greatest and second greatest concerns. The shaded issue ‘additional record keeping’ is cause for the greatest concern. Most respondents identified it as their greatest concern in addition to identifying it as a major problem. ‘Ease of understanding permit’, and ‘compliance costs’ also stand out as issues of great concern.

**Table 10. Permit problems of greatest and second greatest concern**

	<b>Greatest and 2<sup>nd</sup> Greatest Concern (Sum)</b>
Additional record keeping	51
Ease of understanding permit	31
Compliance costs	28
Reporting required by permit	14
Emissions limitations in permit	14
Increase in frequency of collecting monitoring data	13

### **Most permittees identify few major problems, but several minor ones.**

Are major problems widespread among applicants? It appears not. Roughly one-half (48%) did not report any major problems (see Table 11). Of those who identified only one major problem, two-fifths (41%) said the problem was the ‘time it took to get permit’.

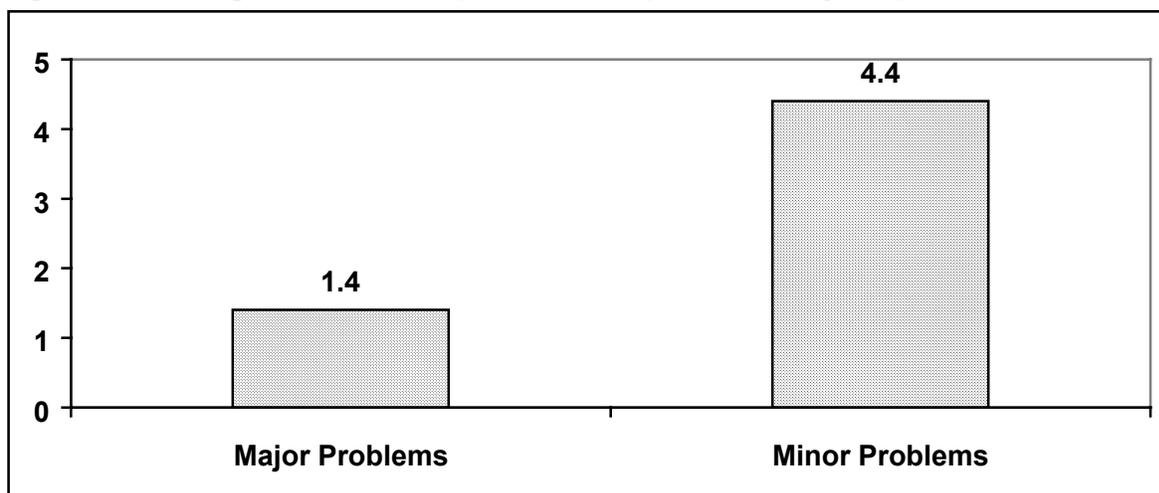
Minor problems were much more prevalent than major problems. Ninety five percent of respondents reported one or more minor problems with the application process or the permit. Roughly two fifths (43%) of respondents identified three to five minor problems.

**Table 11. Numbers of major & minor problems identified by respondents**

	<b>Major Problem</b>	<b>Minor Problem</b>
Did not identify any problems	48%	5%
Identified 1 problem	20	10
Identified 2 problems	12	10
Identified 3-5 problems	12	43
Identified 6-7 problems	6	21
Identified 8 or more problems	2	10

Figure 6 below shows the average numbers of major and minor problems reported by respondents. Respondents were four times more likely to experience minor problems than they were to experience major problems.

**Figure 6. Average numbers of problems experienced by respondents**



## II.E. Problem Resolution

### **Most applicants are satisfied with how DNR staff addressed their problem.**

The questionnaire asked a series of questions that address how well staff responded to questions and concerns. After identifying problems, we asked applicants whether they contacted the DNR about any of their problems, and about DNR staff's response. Just over one-half (56%) of respondents contacted the DNR about one of the problems they identified earlier in the survey. In general, most respondents were satisfied with the way in which their problem was addressed. Table 12 shows that 82 percent of respondents were either 'very satisfied' or 'satisfied' with how the DNR addressed their problem.

**Table 12 Overall satisfaction with how DNR addressed problem**

	Percent
Very satisfied	31%
Satisfied	51
Dissatisfied	14
Very dissatisfied	5

Table 13 shows that respondents contacted the DNR about almost all of the problems identified earlier. The problems brought up with the DNR most frequently are 'time to get permit' (14%), and 'additional record keeping' (17%).

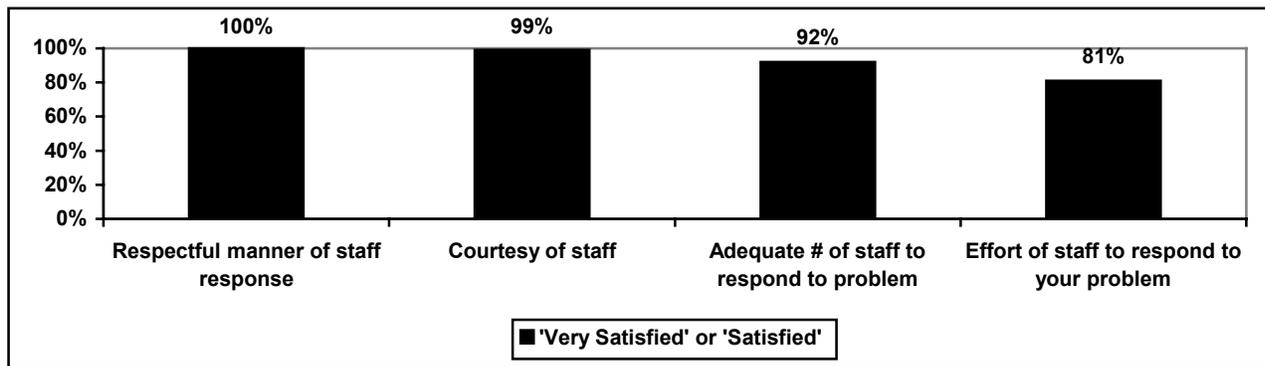
**Table 13. Problems brought to DNR staff's attention**

	Percent
<b>Application process</b>	
Time to get permit	14%
Disagreements of which rules apply	9
Errors in draft permit	8
Amount of information required to submit	5
Public comment draft was different	5
Disagreements over modeling	3
Application was lost	3
Cost of getting permit	2
<b>Permit</b>	
Additional record keeping	17
Emissions limitations in permit	12
Ease of understanding permit	11
Reporting required by permit	6
Increase in frequency of collecting monitoring data	6
Compliance costs	--

**Permit applicants think highly of DNR staff's response to problems.**

We asked respondents to rate specific attributes of DNR staff performance in responding to their problems. Four-fifths or more were satisfied with these attributes. Figure 7 shows that all respondents who contacted the DNR about a problem were 'very satisfied' or 'satisfied' with the 'respectful manner of staff response'. Respondents were least satisfied with staff's 'effort to respond to their problem', with 81 percent reporting that they were 'very satisfied' or 'satisfied'.

**Figure 7. Satisfaction with DNR staff's performance in response to problems**



**DNR staff responded to concerns in a timely manner, generally providing most of what was needed.**

Once they contacted the DNR about their problem, roughly one-half (53%) of respondents said they received most of what they needed as a result of their contact (see Table 14). Just over three-fourths (77%) reported that their problem was addressed in a timely manner.

**Table 14. Response information and timeliness**

	Percent
Problem was addressed in a timely manner	77%
Most of what we needed	53%
Some of what we needed	34
None of what we needed	13

## **Suggestions for how DNR staff could have better handled a problem varied considerably.**

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Twenty five percent of those who contacted the DNR about a problem commented on how the DNR could have better addressed it. Comments ranged from statements about how DNR staff handled a problem to a variety of application process and permit issues. Most respondents who focused on how DNR staff handled a problem commented that DNR staff did not respond in a timely manner, often responding only after repeated contacts by the applicant. Other comments focused on a variety of application process and permit issues. Most process issues involved application processing time. Others involved requests for more decision making at “lower” levels and simplifying the process, the lack of coordination between EPA and DNR, and frustration that the public comment draft permit was different than the previously agreed-upon draft. Permit issues included requests for flexibility and simplifying the reporting process. Some written comments are included below.

### Repeated contacts

*Asked [DNR staff person] over several month period to get together to discuss renewal process and discuss submission. Took more than 3 months of pestering him to get process moving.*

### Time to get permit

*Permitting take too long for renewals.*

*Simplify and issue permits in a prompt streamlined fashion like the state of MI DEQ. Don't get hung up on the intricacies of EPA policy as it relates to DNR.*

### Simplification

*Simplify reporting requirements or clarify.*

### Flexibility and fewer requirements

*Allow for flexibility/decision making at lower levels.*

*More flexible. Less requirements. Less one size fits all. Better understand how a process works.*

*Be more reasonable on emission factors.*

## II.F. Site Visits

### **Most permit applicants experienced site visits and view them as important.**

We asked applicants whether a DNR permit writer and whether a DNR compliance inspector visited their facility sometime in the 24 months prior to receiving their survey. Table 15 shows that roughly three-fourths (73%) of respondents reported site visits by DNR permit writers and Air Program inspection staff.

**Table 15. Site visits by DNR Staff**

	<b>Percent</b>
Permit writer visited facility	73%
Air Program Staff inspected facility in last 24 months	73%

Table 16 shows the importance of site visits by permit writers and DNR inspection staff. Roughly four-fifths (81%) of respondents say that site visits by permit writers are 'very important' or 'important'. Slightly fewer permittees, three-fifths (61%) view inspection visits as 'very important' or 'important'.

**Table 16. Importance of permit writer site visits**

	<b>Percent</b>
<b>Permit writer site visits</b>	
Very important	46%
Important	35
Unimportant	17
Very unimportant	1
<b>DNR air program staff inspection site visits</b>	
Very important	8%
Important	51
Unimportant	36
Very unimportant	5

Focus group participants discussed the importance of DNR permit writers visiting their facilities during the application process. Most stressed that a site visit is essential to a writer's understanding their processes. Greater understanding of a facility's processes (greater facility knowledge) leads to fewer questions, fewer erroneous assumptions and fewer permit errors. Some suggested that application processing time and cost increase when writers neglect to visit the facilities. Some focus group quotations are below.

Must visit a facility to understand it

*A picture is worth a thousand words. ... So she had to by coming out there she could see that we were doing all these different things and what is feasible and what is possible and what is not possible. You know you sit in Madison and try to write this report it is hard to see how, to visualize how these operations take effect...*

Potential questions are answered during site visits

*... we had the permit writer, came out to the facility along with the compliance officer during an inspection, and went through the facility. I thought that was very beneficial. In fact, I think that it should almost be a requirement for them to come out and at least come through. Because there were a lot of questions that were asked, and there were a lot of questions that were answered. And it certainly served as a foundation for the rest of the discussion on the permit.*

Lack of site visits increase costs

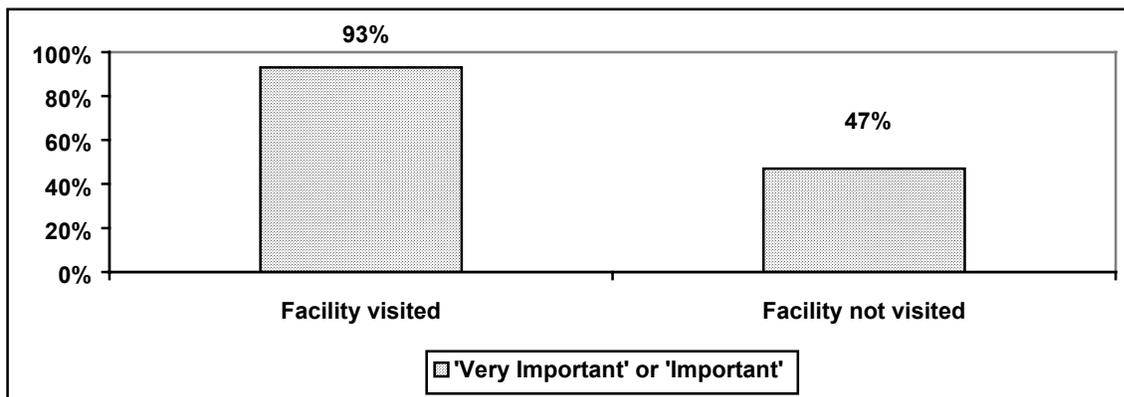
*Even the plant, because where I got comments from the environmental people, where the person didn't come out, the permit writer did not understand the industrial processes for which the permit was being written. Which caused extra work both for the facility, and the permit writer, and our consultant involved, which you know cost us a lot more money.*

**Permit applicants who were visited by DNR staff were more likely to place importance on such visits.**

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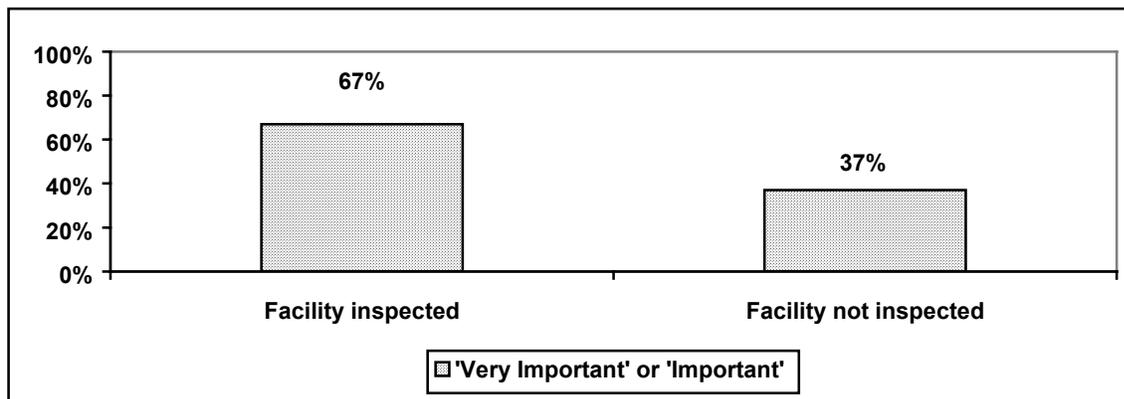
Figures 8 and 9 show that permittees who experienced site visits were more likely to place importance on those visits than those who did not experience a visit. This is especially true of those who experienced a visit by a permit writer. Just over 9 in 10 (93%) applicants who experienced site visits by permit writers said that those visits are 'very important' or 'important'. This is compared to the 47 percent of applicants who were not visited who said that such visits are 'very important' or 'important'.

**Figure 8. Permit writer site visit**



Roughly two-thirds (67%) of those respondents who experienced inspection visits said that they are 'very important' or 'important'. Fewer of those whose facilities were not inspected (37%) placed similar importance on such visits.

**Figure 9. Importance of inspection visit**



**Large facilities are more likely to place importance on site visits by permit writers than are small facilities.**

The survey asked how many people are employed by a facility. Researchers grouped facilities according to the designations 'small facilities' – 100 or fewer employees, and 'large facilities' – more than 100 employees. Table 17 below shows that more respondents of large facilities place importance on permit writer site visits than do respondents of small facilities. Almost nine in ten respondents at large facilities said that permit writer site visits are important as opposed to seven in ten respondents of small facilities.

**Table 17. Importance of permit writer site visits**

	<b>Small Facilities</b>	<b>Large Facilities</b>
<b>Permit writer visit important</b>	71%	88%
<b>Permit writer visit unimportant</b>	29	12

Researchers can not say for sure why respondents at large facilities place more importance on permit writer site visits. However, one possibility may be that processes at larger facilities are more complex than those at smaller facilities. Focus group results suggested that some people with more complex processes believe that visiting the site and actually seeing the process is essential to understanding the processes and writing a permit for the facility.

*... nobody [permit writers] was going to learn. I don't even know all the processes after all these years. It's just so dang complicated. The beauty of it is they walked into the reactor room and every one of them just went, "Oh my God". So, I think they understood the complexity. And that to me, was the benefit.*

## II.G. Inspections

### **Most respondents reported satisfaction with their inspection visits.**

Roughly three fourths (73%) of respondents said that DNR Air Program staff had inspected their facility sometime in the 24 months prior to receiving their survey (see Table 18). Interestingly, almost all of those respondents who were visited (98%) reported that they were ‘very satisfied’ or ‘satisfied’ with the visit. Results elsewhere in this report suggest that for the most part, permit applicants are satisfied with DNR staff, and less satisfied with aspects of the permit. Satisfaction with DNR staff is reflected in these inspection visit results.

**Table 18. Overall satisfaction with inspection visit**

	<b>Percent</b>
DNR Air Program staff inspected facility	73%
<b>Satisfaction with inspection visit</b>	
Very satisfied	47%
Satisfied	51
Dissatisfied	2
Very dissatisfied	--

### **Most applicants found DNR inspectors to be courteous, helpful and fair during their most recent inspection.**

Just as applicants were satisfied with inspection site visits overall, they were also satisfied with selected attributes of DNR staff performance. Table 19 shows that more than 9 in 10 applicants said they were ‘very satisfied’ or ‘satisfied’ with courtesy, helpfulness, fairness and provision of information during the visit.

**Table 19. Satisfaction with selected inspection performance attributes**

	<b>Very Satisfied</b>	<b>Satisfied</b>	<b>Dissatisfied</b>	<b>Very Dissatisfied</b>
<b>Courtesy</b>	58%	41	1	--
<b>Helpfulness</b>	51%	48	--	1
<b>Fairness*</b>	46%	51	2	--
<b>Provision of information</b>	36%	60	4	--

\*One percent responded “don’t know”.

## II.H. Providing Information and Answering Questions

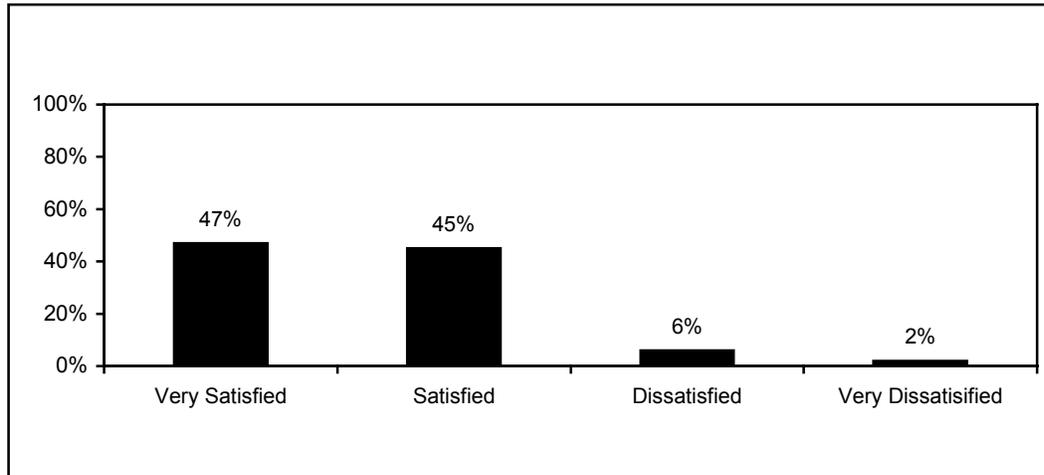
### Respondents were satisfied with the timeliness of DNR staff's responses to their questions.

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We asked applicants to identify the topic which best represents the most recent permit-related question they asked DNR staff in the last 24 months. We then asked them to comment on the timeliness of DNR staff's response to their question.

Eighty four percent of respondents said they contacted DNR staff about a question related to their permit in the last 24 months. Figure 10 shows that roughly nine-tenths (92%) of those who contacted staff were either 'very satisfied' or 'satisfied' with the timeliness of DNR staff's responses to their questions.

**Figure 10. Satisfaction with timeliness of staff's responses to questions**



Focus group comments support this data. Most focus group participants said that DNR staff were very helpful in responding to their questions. In general, staff provided the information requested in a timely manner.

*I would say overall communications are really great. I don't know what anybody else would say but I have had great communications. I have always gotten answers instantly you know even when I have had software problems. I have always been able to call and get immediate help.*

*There has never been a time I haven't called and got a good information, supportive information, and the ways that we can resolve situations.*

Applicants contacted DNR staff about a wide variety of topics. The topics that best describe applicants' permit-related questions to the DNR are found in Table 20 below.

Thirty percent asked about limitations or restrictions in the permit, 21 percent asked about information required for the permit, and 17 percent had reporting questions. Most of the issues included in ‘other’ involve questions about changes or modifications of equipment covered by the permit.

**Table 20. Most recent question topic asked of DNR staff in last 24 months**

	<b>Percent</b>
<b>Limitations or restrictions in permit</b>	<b>30%</b>
<b>Information required for permit</b>	<b>21</b>
<b>Reporting</b>	<b>17</b>
Draft permit	10
Monitoring	7
Time until permit complete	3
Dispersion modeling	3
Inspections	1
Other	8

**Most applicants said that DNR staff responded to their questions in the amount of time they expected or sooner.**

We asked applicants to tell us when they expected a response to their question and when they actually received one. Most respondents (84%) said that DNR staff responded to their question when they expected or sooner. Table 21 shows that 65 percent said that DNR Staff’s response time was what they expected. Roughly one-fifth (19%) reported that DNR Staff’s response was sooner than expected.

**Table 21. Actual versus expected response times**

	<b>Percent</b>
Actual and expected response the same	65%
Actual response was sooner than expected	19
Actual response was later than expected	16

Table 22 provides a more detailed description of similarities and differences between expected and actual DNR staff response times. For each expected response, all cells including and to the left of the shaded area represent responses that came when expected or sooner. Cells to the right of the shaded areas represent responses that came later than expected. For example, of those who expected a DNR response to their question the same day they asked it, one-fifth (20%) received a response immediately, and 63% received a response when they expected it, the same day. Eighteen percent received a response later than they expected it to come.

**Table 22. Detailed response times, expected versus actual**

Expected response	Actual response					
	Immediately	Same day	2 days-<1 wk	1-2 weeks	3-4 weeks	≥ 1 month
Immediately	92%	--	8	--	--	--
Same day	20%	63	9	6	3	--
2 days - <1 wk	8%	17	61	8	4	2
1-2 weeks	--%	--	11	56	11	22
3-4 weeks	--%	--	--	--	--	--
1 mo or longer	--%	--	--	--	--	--

## II.I. Written Suggestions for Program Improvement

### **Most respondents discussed some method of simplifying the process**

Forty five percent of respondents commented on what the DNR could do, if anything, to improve the manner in which staff implement the Air Operating Permit Program. Comments represent a wide range of views and suggestions (see Table 23), with most having to do with simplification of the permit process. Focus group participants also talked about streamlining the process.

**Table 23. Suggestions for the Air Operating Permit Program\***

	<b>Percent</b>
Simplify	24%
Staff suggestions	16
Address length of application process	15
Consistency	15
Regulation suggestions	10
Explain	10
Flexibility	6
See nothing to change	4
Other	7

\* These are responses to an open-ended question. Responses were grouped into categories according to content.

Written comments about what the DNR can do, if anything, to improve the manner in which staff members implement the Air Operating Permit Program are included below.

#### **Simplify**

Those who wrote about simplifying the process were concerned about simplifying the reports, the permit itself, the forms, and instructions. Some quotations are below.

*It is confusing about who gets what required reports, i.e. WI and EPA. Simplify – clarify who gets what reports and when. With several permits, it's a nightmare because each permit has a different reporting schedule. 30 or 60, to WI or to EPA.*

*Try to simplify and standardize permits and permit language.*

*Forms are cumbersome and redundant. Improve systems required by DNR to gather information.*

### **Staff suggestions**

Staff suggestions stress the importance of staff knowledge, the importance of local staff and the need for the DNR to improve its attitude toward business. Some respondents also identified specific DNR staff, suggesting that the Program could use more people like them.

*Know the rules and how they pertain to my specific industry.*

*Keep permit writers ... at the local level. They are the most knowledgeable in your operations and needs.*

*Attitude. Business owner/operators are not criminals.*

### **Length of process**

As might be expected, respondents commented on the length of the application process and suggested that timeliness be approved.

*Decrease the number of years between application and permit.*

*More tech. staff and/or information systems automation to speed up/simplify the process.*

*We originally applied for a permit in 1993. After requesting a modification in 1998 it was not approved until 2000!*

### **Consistency**

Several respondents wrote of the importance of consistency among regions. They want the regulations to be applied consistently among the regions, applied consistently within industries, and consistent staff interpretation of the rules.

*Stop people from pushing personal agendas! DNR must be consistent. Right now each person does their own thing. This is by far the #1 issue.*

*Understand industry better and be more consistent across state.*

*There are companies in our industry that have not yet applied for their permit yet – need to cover entire industry.*

*Consistency between divisions/regions and overall permit knowledge.*

**Flexibility**

While some respondents are concerned about consistency, a few others place more importance on flexibility in the process.

*Understand that flexibility is very important when writing a permit. This can minimize the need for permit changes (saves the regulated community and taxpayers \$).*

**Regulation suggestions**

Suggestions varied. Several suggested limiting requirements. Other suggestions include the creation of an industry specific permit and the creation of a general operation permit.

*Ease restrictions if possible.*

*Be more practical. Our operation cannot run 24/7. Why be held to those standards?*

## II.J. Background

### **Regulatory responsibilities, the role of consultants, and additional background**

Most facilities do not assign one single person to work full-time with regulatory responsibilities. Almost three-fourths of respondents (70%) say that the person in their firm with regulatory responsibilities works on non-regulatory duties as well. Five percent say that no one in their facility is regularly assigned to regulatory responsibilities. See Table 24.

**Table 24. Person who handles regulatory responsibilities in firm**

	<b>Percent*</b>
Outside consultants handle some/most regulatory responsibilities	43%
Person has regulatory responsibility but works on non-regulatory duties as well	70%
Person in firm is assigned to work full time with regulatory responsibilities	24%
No single person is regularly assigned to regulatory responsibilities	5%

\*Percentages do not add to 100 because respondents could identify more than one option.

Recipients of the original permit were more likely to rely on consultants at some time during the permit application process. Table 25 shows that one-half (50%) of original permit recipients reported that outside consultants handle some or most regulatory responsibilities. Twenty nine percent of renewal recipients reported the same.

**Table 25. Use of consultants, by permit type**

	<b>Percent*</b>
Original permit recipients who use consultants	50%
Renewal permit recipients who use consultants	29%

Applicants rely on their consultants to varying degrees during the air operating permit application process. Table 26 shows that one-third (33%) of applicants' consultants drafted the permit application and shepherded it through the entire process. Fifteen percent of those applicants who used consultants reported that their consultants only provided advice during the application process.

**Table 26. Role of consultants**

	<b>Percent</b>
Provided advice only	15%
Drafted initial application	23
Drafted application and submitted additional information	28
Drafted application and shepherded it through entire process	33

Table 27 shows additional background information of respondents. Eighteen percent of respondents reported fewer than 100 people in their firm. Just over one-half (56%) of respondents reported that their firm has a parent company and one third of respondents said they are responsible for obtaining air operating permits for multiple facilities. Several reported that they interact with multiple DNR programs. Roughly three-fifths reported participating in DNR's WPDES permit program (59%) and the Hazardous Waste program (58%). One-third (34%) of respondents said they applied for an air construction permit in the two years prior to receiving the survey.

**Table 27. More background information**

	<b>Percent</b>
<b>Number of people in firm</b>	
Fewer than 50	14%
50 – 99	18
100 – 249	28
250 – 499	16
500 or more	18
Did not report number	5
<b>Firms with parent company</b>	56%
<b>Respondents who are responsible for obtaining air operating permits for multiple facilities</b>	33%
<b>DNR Programs the facilities operate under</b>	
Air operating permits	100%
WPDES permits	59%
Drinking water and groundwater	32%
Hazardous waste	58%
Solid waste	36%
<b>Applied for construction permit in last 2 years</b>	34%

### **III. COMPLETION OF SIP OBJECTIVES**

This study was undertaken, in part, to meet the objectives of the Department's Strategic Implementation Plan (SIP). These objectives include measuring customer satisfaction, monitoring response times for customer questions, and tracking customer satisfaction with the way staff resolve their concerns and complaints. The SIP set the following benchmarks for each of these:

- Develop a means to measure customer satisfaction and achieve an 85 percent rate of customer satisfaction by 2007.
- Establish acceptable response times for customer questions and meet those response times by 2005.
- Establish a baseline for customer satisfaction with problem resolution and achieve steady increases in customer satisfaction between 2002 and 2007.

### **III.A. Customer Satisfaction**

#### **The Air Program has already met or is close to meeting the goals for customer satisfaction.**

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The SIP requires programs to establish tools for measuring customer satisfaction with the goal of achieving 85 percent customer satisfaction by 2007. As noted in the introduction, this study focuses on a single type of interaction between the DNR and the regulated community: the issuance of an air operating permit. There is, however, no single, simple measure of customer satisfaction for such a complicated interaction. The focus groups disclosed different facets of participation including the performance of the staff, the structure of the permitting process, and the clarity of the final permit issued.

Table 28 shows that the Air Program is currently exceeding its goals for customer satisfaction in the area of staff performance. The table also shows that the Air Program has not yet reached its goals of 85 percent customer satisfaction in areas related to the application process and the clarity of the final permit. The shaded percentages in the difference column represent those issues for which the Air Program has yet to meet the target for satisfaction specified in the SIP.

**Table 28. Results achieved versus SIP goals**

<b>Issue</b>	<b>Percent Satisfied*</b>	<b>Target</b>	<b>Difference</b>
<b>Satisfaction with DNR staff who processed permit</b>			
Overall satisfaction with DNR staff who processed permit	99%	85%	+14%
Courtesy	99%	85%	+14%
Effort	97%	85%	+12%
Helpfulness	96%	85%	+11%
Accessibility	96%	85%	+11%
Knowledge of air permit rules	95%	85%	+10%
Knowledge of facility	88%	85%	+3%
Knowledge of industry	85%	85%	0
<b>Satisfaction with aspects of application process</b>			
Flexibility in permit negotiations	83%	85%	-2%
Clarity of application instructions	78%	85%	-7%
Dispersion modeling	74%	85%	-11%
Amount of information required to submit	69%	85%	-16%
Ease of application process	66%	85%	-19%
Time to get permit	60%	85%	-25%
<b>Satisfaction with attributes of air operating permit</b>			
Ease of identifying changes (renewals)	80%	85%	-5%
Permit conditions fair and consistent	84%	85%	-1%
Ease of understanding permit	80%	85%	-5%
<b>Satisfaction with inspection visit performance attributes</b>			
Overall satisfaction with inspection visit	98%	85%	+13%
Courtesy	99%	85%	+14%
Helpfulness	99%	85%	+14%
Fairness	97%	85%	+12%
Provision of information	96%	85%	+11%

\*Percent 'very satisfied' or 'satisfied'.

### **III.B. Resolving Customer Concerns and Complaints**

#### **Customers are generally satisfied with the way their concerns and complaints were resolved.**

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The SIP calls on programs to track "disappointed" customers and to establish a baseline measurement for their treatment. For the purpose of this study, 'disappointed customers' were defined as those who contact the DNR with a problem or complaint. The SIP also states that these customers 'will be let down gently'. This study defined letting down gently as responding to them in a timely manner with effort, courtesy and respect.

Table 29 presents an overview of the way in which customers' concerns and complaints about their operating permits were resolved. This table shows the following:

- Slightly more than one-half of applicants contacted DNR staff with a problem.
- One-half of those who made such a contact got 'most of what they needed' as a result of their contact.
- Three-quarters (77%) said their problem was addressed in a 'timely manner'.
- Eight out of ten said they were satisfied with the way staff addressed their problem.
- Those who contacted staff about a concern or complaint gave staff high marks for courtesy, respect and the effort they made to resolve the problem.

**Table 29. Resolution of & satisfaction with resolution of concerns**

	<b>Percent</b>
<b>Contacted the staff with a problem</b>	
Yes	56%
No	44
<b>Applicant got help that they needed</b>	
Most of what was needed	53%
Some of what was needed	34
None of what was needed	13
<b>Problem was addressed in a timely manner</b>	
Yes	77%
No	23
<b>Satisfaction with the way problem was addressed</b>	
Very satisfied	31%
Satisfied	51
Dissatisfied	14
Very dissatisfied	5
<b>Very satisfied or satisfied with staff performance</b>	
Respectful response	100%
Courteous response	99%
Effort to resolve problem	82%

## Determinants of satisfaction

Two issues drive customers' satisfaction with staff efforts to help them: how quickly their problem was resolved and how successful they were in getting the help they needed. The most satisfied customers were those who got most of the help they needed in a timely manner. The least satisfied were those who had to wait, and then didn't get the help they needed.

Tables 30 and 31 show the levels of customer satisfaction in the context of the two drivers of satisfaction. The tables show that:

- Ninety seven percent of those who got most of the help they needed were satisfied compared with just 25 percent of those who got none of what they needed.
- Ninety four percent of those who received a timely response were satisfied compared with only a 40 percent level of satisfaction for those who had to wait.

**Table 30. Effect of response quality on satisfaction with problem resolution**

	Most of what needed	Some of what needed	None of what needed
<b>Satisfied*</b>	97%	77%	25%
<b>Dissatisfied**</b>	3	23	75

\*Percent 'very satisfied' or 'satisfied'.

\*\*Percent 'very dissatisfied' or 'dissatisfied'.

**Table 31. Effect of timeliness of response on satisfaction with problem resolution**

	Response was timely	Response was not timely
<b>Satisfied*</b>	94%	40%
<b>Dissatisfied*</b>	6	60

\*Percent 'very satisfied' or 'satisfied'.

\*\*Percent 'very dissatisfied' or 'dissatisfied'.

Table 32 shows the various consequences for satisfaction of the various interactions of timeliness and quality of response. The table shows that:

- One hundred percent of those who got most of the help they needed and felt that staff response was timely were satisfied.
- The other extreme includes those who got none of the help they needed and felt that the response was not timely. Only one-fourth (29%) of these respondents were satisfied.

- Nearly one half (48%) of those who contacted the agency with a problem got most of what they needed in what they regarded as a timely manner.

**Table 32. Combined effects of quality and timeliness of response on satisfaction with problem resolution**

	Response timely +			Response <u>not</u> timely +		
	Most of needed	Some of needed	None of needed	Most of needed	Some of needed	None of needed
<b>Satisfied*</b>	100%	88%	0%	68%	40%	29%
<b>Dissatisfied**</b>	0	12	100	33	60	71
<b>Percentage of total contacts***</b>	(48%)	(27%)	(2%)	(5%)	(8%)	(11%)

\*Percent 'very satisfied' or 'satisfied'.

\*\*Percent 'very dissatisfied' or 'dissatisfied'.

\*\*\*Percentages of those who contacted the DNR about a problem.

### III.C. Timeliness of Responses to Customer Questions

#### **Air Operating Permit program staff meet SIP objectives for timely responses to customer's questions and concerns.**

The SIP directs programs to establish baselines that define timely responses to customer concerns, questions and complaints. It then directs programs to work towards actually meeting those objectives. The goal is a 20% reduction in response time by 2005 (See Appendix A for exact language).

Researchers suggest that an acceptable response time is one that meets or exceeds customer's expectations. Do customers get an answer when they think they should? With that definition in mind, we suggest that the response time target be that 85% of customers who contact the DNR receive a response when they expect one or sooner.

This survey suggests that the Air Operating Program is meeting the goal set by customer expectations. All told, 84% of those who contacted the DNR about a question received a response to their question when they expected it or sooner (see Table 33). The Table also shows the percentages of respondents who received a response when they expected or sooner for each expected response time. The shaded areas reflect specific response areas for improvement. Improving response time for those questions to which applicants expect a response in one – two weeks is the response time most in need of improvement. Currently, sixty seven percent of applicants who expected a response in one – two weeks said they received an answer then or sooner. This is 18 percentage points off the targeted goal of 85%.

**Table 33. Results achieved versus SIP goals**

	<b>RECEIVED a response when expected or sooner</b>	<b>Target</b>	<b>Difference</b>
<b>Applicants who received a response when expected or sooner</b>	84%	85%	-1%
<b>Expected a response ...</b>	<b>RECEIVED a response when expected or sooner</b>		
Immediately	92%	85%	+7%
Same day	83%	85%	-2%
Two days – < one week	87%	85%	+2%
One – two weeks	67%	85%	-18%

\*Respondents said that the DNR should respond in one – two weeks or less.

People who receive a response when they expect one or sooner tend to be more satisfied with the timeliness of that response than those who don't. Table 34 shows that respondents who received a response to their question when they expected it or sooner

were much more satisfied with the timeliness of their response than were those who received a response later than expected.

**Table 34. Applicant satisfaction is affected by response time**

	<b>Satisfied</b>	<b>Dissatisfied</b>
<b>Response came SOONER than expected</b>	21%	--
<b>Response came WHEN EXPECTED</b>	68	25%
<b>Response came LATER than expected</b>	11	75

\*Percent 'very satisfied' or 'satisfied'.

# **APPENDIX A**

## **DNR STRATEGIC IMPLEMENTATION PLAN OBJECTIVES**

## **Strategic Implementation Plan Objectives Addressed in this Study**

### People 2a Subobjective

*By 2002, using customer and staff input, acceptable response times for customers concerns, questions and complaints will be established. By 2005, we will decrease our response time to these by 20% from the base year 2002. In circumstances where our DNR colleagues are our customers, will hold ourselves to the same standard as for external customers.*

### People 2b Subobjective

*By 2002, we will establish an instrument for measuring customer satisfaction and we will strive to increase the satisfaction level by 10% per year (as compared to the previous year) through 2007 with a goal of meeting 85% satisfaction. In circumstances where our DNR colleagues are our customers, we will hold ourselves to the same standards as for external customers.*

### People 2c Subobjective

*By 2002, we will establish an instrument for specifically surveying “disappointed” customers to learn how they feel they were treated in the process. We will establish a baseline for our courteous, respectful treatment of these unhappy customers and increase our ability to “let them down gently” by 5% per year through 2007.*