

Ford, Victoria

From: Strong, Greg
Sent: Monday, June 27, 2011 2:20 PM
To: Kirts, Christopher; Maher, Jim; AlNahdy, Khalid; Long, Melissa M.; Fitzsimmons, Michael; Conway, Jodi
Cc: Ford, Victoria
Subject: FW: Strategic Planning -- Upcoming (7/12 - 7/13) meeting with Secretary Vinyard
Importance: High

All:

Please see the emails below from Geof and Jon regarding the upcoming Strategic Planning meeting in Tallahassee which I will be participating in.

As I read it, this session will focus on three main areas: (1) Efficiency, (2) Effectiveness, and (3) Customer Service.

Personally, I think these are three of the qualities that *define* the NED. It's how we think about challenges, find solutions, and respond quickly to customer needs, each and every day. That is because through your leadership and initiative, we have made tremendous improvements in each of these areas during the last few years. Because of that, I will have lots of excellent examples to share with the Secretary and others, in a few weeks.

That said, this is also an excellent opportunity for you to provide me with input on some of the things that you have put in place (that are working well)—and even your thoughtful suggestions and ideas—that you believe should now be carefully considered by the leadership team, for broader implementation in the Department.

Please send me your thoughts and suggestions by July 7th. I look forward to reading your responses!

Thanks,

Greg

Gregory J. Strong
Director, Northeast District
Florida Department of Environmental Protection
Ph: (904)-256-1504

From: Mansfield, Geoffrey
Sent: Monday, June 27, 2011 10:29 AM
To: Bartlett, Drew; Caspary, Jorge; Creech, Jill; Garfein, Vivian; Halpin, Mike; Hamilton, Shawn; Iglehart, Jon; Strong, Greg; Thomasson, Mark; Vazquez, Pamala
Cc: Burke, Patience; Frohock, Linda; Claridge, Kevin; Prather, Jeff; Vielhauer, Trina; Boudreau, Darryl; Mulkey, Cindy; Landers, Randal; Simpson, Alisha; Yaun, Shelley; Aldama Harmon, Gloria; Fillingim, Mary; Ford, Victoria; Hyde, Bonnie; Lalonde, Stephanie; Pennington, Judith A.; Scarpuzzi, Denise; Smith, Brandy M.; Stoyshich, Jill; Zola, Yvonne; Littlejohn, Jeff; Gaskin, Carla A.; Case, Kekai
Subject: Strategic Planning -- Upcoming (7/12 - 7/13) meeting with Secretary Vinyard
Importance: High

All,

It doesn't appear there'll be an opportunity for Jeff to get together with you collectively before the strategic planning meeting. With that in mind, he asked that I share some general guidance to help you prepare for the meeting.

First and foremost, enjoy the opportunity to meet peers, old and new; commune with the Secretary and other DEP leadership; share the good practices you're already implementing; and explore with coworkers your creative ideas for improving environmental protection in Florida. As Jon Steverson notes in his email (below), the meeting is intended to be interactive—come ready to engage.

Jon sets out the Secretary's primary focus in developing strategic priorities to act on—"regulatory efficiency and cost reduction" and a "streamlined, customer service based state agency." With that in mind, ponder the priorities under discussion over the last several months, in particular, and be prepared to articulate ideas and actions for a better DEP. Some priorities to keep in mind:

- Increase DEP's effectiveness in protecting, preserving and restoring Florida's natural resources
- Improve operational efficiency, consistency and customer service
- Focus on outcomes, not process
- Improve measurement of environmental outcomes and business practices
- Partner with the private sector; leverage private sector innovations
- Foster a culture of innovation and adaptability
- Promote regulatory consistency across DEP, the WMDs and delegated local programs
- Have the best people in the right positions to make the right decisions
- Increase e-permitting, other e-business
- Increase reliance on professional certifications
- Reduce bureaucracy, eliminate redundancies, streamline
- Expand public access to environmental data

As alluded to above, if you've been implementing practices that are showing dividends, please share both the practices and the results at the meeting. Strangely enough, good ideas resonate more when backed by good data. If you have ideas you want to try out, don't be shy—engaging others is the best way to hone them. Please bring to the table actions that can be implemented immediately as well as those that may require more vetting and longer-term development.

A group of diverse, bright, committed people ought to be able to generate quite a conversation and solid strategies to act on.

If Jeff has other thoughts or guidance to share, I'm sure he'll do so. If you have questions, let us know. Thank all.

Geof

Geof Mansfield
Florida Department of Environmental Protection
Policy Analyst
geofrey.mansfield@dep.state.fl.us
850.245.8339

From: Steverson, Jon

To: Ballard, Bob G. (Deputy Secretary); Barnet, Henry; Bartlett, Drew; Beason, Tom; Caspary, Jorge; Cone, Rachel; Creech, Jill; Fitzwater, Jennifer; Forgione, Donald; Garfein, Vivian; Gaskin, Carla A.; Halpin, Mike; Hamilton, Shawn; Iglehart, Jon; Kelly, Cynthia; Littlejohn, Jeff; Long, Mike; Palmer, Mollie; Schmalfluss, Belva; Slager, Erma; Steverson, Jon; Strong, Greg; Thomasson, Mark; Vazquez, Pamala; Vinyard, Herschel

Sent: Wed Jun 15 17:02:18 2011

Subject: Strategic Planning

As previously discussed, we are scheduling a strategic planning meeting for July 12, 1:00 pm – July 13, noon. Exact location and details will be forwarded to you at a later time, however, we will meet in Tallahassee.

Secretary Vinyard wants to focus on the goals of: **(1)regulatory efficiency and (2)cost reduction.** The secretary counts on a very interactive discussion and he asks that you give this the most sincere of thought well before the meeting. This will be an opportunity to demonstrate your commitment to the Governor's vision of a streamlined, customer service based state agency.

Deputies, he anticipates that – if you have not already – you will meet with your directors over the next month to develop recommendations to bring to the meeting for discussion.

Secretary Vinyard has asked me to assist in making this a successful meeting that will lead toward some key decision points that we can promptly put into action. I will follow up with some of you to discuss further as the agenda matures.

Our plan at this point is to meet as one group for an hour or two for some preliminary discussion, then divide into two groups – Regulatory and Land and Recreation (with others of us roving between the two). We will reconvene as a whole body on the second day to discuss prevailing ideas and develop final strategic recommendations.

If you have any questions, please do not hesitate to contact me.

Ford, Victoria

From: Strong, Greg
Sent: Friday, July 01, 2011 11:15 AM
To: Kirts, Christopher; Maher, Jim; AlNahdy, Khalid; Long, Melissa M.; Fitzsimmons, Michael; Conway, Jodi
Cc: Ford, Victoria
Subject: FW: Strategic Planning
Attachments: FW: Strategic Planning -- Upcoming (7/12 - 7/13) meeting with Secretary Vinyard

All:

Please see the update and revised guidance on this assignment from Jon Steverson.

Let me know if you have any questions.

Thanks.

Gregory J. Strong
Director, Northeast District
Florida Department of Environmental Protection
Ph: (904)-256-1504

From: Steverson, Jon
Sent: Friday, July 01, 2011 9:00 AM
To: Ballard, Bob G. (Deputy Secretary); Barnet, Henry; Bartlett, Drew; Beason, Tom; Caspary, Jorge; Cone, Rachel; Creech, Jill; Fitzwater, Jennifer; Forgione, Donald; Garfein, Vivian; Gaskin, Carla A.; Halpin, Mike; Hamilton, Shawn; Iglehart, Jon; Kelly, Cynthia; Littlejohn, Jeff; Long, Mike; Palmer, Mollie; Schmalfluss, Belva; Slager, Erma; Steverson, Jon; Strong, Greg; Thomasson, Mark; Vazquez, Pamala; Vinyard, Herschel; Ferris, Julie
Subject: Strategic Planning

In recent discussions, I've have had questions about how to best layout ideas for the strategic planning exercise. In preparing your submissions for the meeting, please keep in mind two key objectives: regulatory streamlining and cost reductions. We will be looking to organize and integrate your submissions so that we can focus discussion on actions the department can take to prepare for both a longer-term commitment to continued performance improvement and also identify those actions we can take more rapidly to prepare for our upcoming budget proposal.

For your ideas and proposals, to the extent that you can, try to provide:

- a clear description of what you propose to do
- identify resources and key activities needed for the project
- define the benefits and try to identify key performance metrics that would define success
- estimate the amount of time needed to implement the project (proposed start and end dates)
- estimate projected savings in time, resources, and/or cost

One of the main purposes of our discussions during the strategic planning meeting will be to sort through and analyze the proposals with the intention of setting priorities for those performance improvement projects representing the best use of our time and resources. If you have any other questions, please do not hesitate to contact me @ (850) 245-2142.

Ford, Victoria

From: Strong, Greg
Sent: Tuesday, July 05, 2011 2:56 PM
To: Conway, Jodi
Cc: Ford, Victoria
Subject: FW: Strategic Planning
Attachments: NED's Project Proposals for Strategic Planning Meeting - July 12 & 13, 2011.doc

Jodi,

Here is the latest version of NED responses. Vic has done a terrific job in getting the document to this stage.

Now, we need to really focus the information so that it reads as it should—per the original assignment—and really highlights the positives with each project/concept.

Also, there may be other things (past projects) that come to mind when you start looking at this.

Thanks for your help!

Greg

From: Ford, Victoria
Sent: Tuesday, July 05, 2011 12:59 PM
To: Strong, Greg
Subject: RE: Strategic Planning

Greg,

All programs have responded, with the exception of PW information.

I've compiled for your review a rough draft of the responses received.

Thanks,

Vic

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AIR:

NED Air program Accomplishments and Initiatives.

Increasing: Efficiency, Effectiveness, and Customer Service.

1. Efficiency:

- Established an inspection schedule to inspect every permitted facility at least once a year. This has promoted a smoother program for facility inspectors, having a schedule, knowing when a facility's inspection is going to occur has helped in planning. Increasing the program's presence and communication with facility operations has promoted compliance.
- Increased use of hand-held electronic computer tablets in the field during facility inspections. Downloading facility data, facility permits, and inspection requirements to the EASIIR tablet (Electronic Access System for Inspection Information Retrieval) promotes a more organized and complete inspection. Using the tablet for inspection data entry and then uploading the finalized inspection, once back at the office, into the computer database, has made inspections move along a little faster and with fewer errors.

2. Effectiveness:

- The program has just initiated, where and when possible, a strong effort to combine facility inspections, complaint responses, and ambient monitoring site visits to reduce the use of gasoline and vehicle mileage.
- Over 98% of all program responses and permitting communications are electronic, thus greatly reducing the use of paper and the cost of postage.

3. Customer Service:

- The program mails and passes out customer survey cards to obtain feedback that could help promote a better understanding of conditions that could promote better service.
- All complaints, whenever possible, are responded to the same day or within 24 hours. The compliance program is flexible with any facility requests to adjust time and date for testing.

2. Reduction:

The permitting program works to initiate and promote continual communications with permit applicants to promote understanding and reduce requests for additional information, (RAIs), and reduce the time to issue permits.

The following are some ideas of changes that could provide a reduction in challenges to the Air Program while providing for any reduction of staff that could occur while also promoting reduction of possible impositions on industry and not adversely emitting additional pollution.

- *Dry Cleaners:* The Air Program inspects Dry Cleaners once a year. The Hazardous Waste Program also inspects Dry Cleaners. The Hazardous Waste inspections are more detailed and the Air Program inspection requirements could be shifted to the Hazardous Waste Program thus eliminating the Air Inspections and reducing inspections at the facilities.
- *Open Burning:* Shift all open burning responsibilities of the Air Program to the Department of Forestry. Forestry has responsibilities in Open burning that could not be shifted to another program. Air Program responsibilities including Air curtain Incinerators could be handled by Forestry, thus reducing multiple program regulation.
- *Permits:* Convert several permitting actions to "General Permits" or "Notifications of Action" by the facility. Currently these actions require construction permitting. "General Permitting", (Notification) is much less onerous on the facilities, and some reduction of efforts for the Department.
 - (1) Asphalt Plants
 - (2) Compression Engines
 - (3) Natural Gas Pipeline Industry Actions.
 - (4) Poly Styrene Boat Industry Actions.
 - (5) Air Curtain Incinerators
 - (6) Small grit or sand blasting operations
 - (7) Smaller Boilers

Some limitations will be provided by applicable rule.

Do not modify the Title V permit with every issued construction permit. Larger facilities, (EPA Title V), are

required to modify their Title V Permit every time they receive a construction permit. Many of the larger facilities submit numerous construction permit applications throughout the Title V 5 year permit life to modify their operations. Reducing the permitting requirements will reduce some efforts for both industry and the Air Program.

- *Crematories:* Shift Air Program inspection requirements to the Department of Financial Services, Division of Funeral and Crematory and Consumer Services, thus reducing regulation by two agencies.

SLERP:

For ERP, the concept of **cradle to grave permitting and compliance** hits on all three of the focus areas identified in the initial assignment of 6/27 as follows and is further developed in the bullet format requested 7/1 below. This concept addresses (1) **efficiency** in that a permitter has seen the site pre-alteration, envisioned the proposed impacts as they were developed through the permit process, and can resolve any compliance actions that resulted after those permitted activities have occurred with fewer site inspections, few resources and with less time spent recreating what happened and when; (2) this is an **effective** use of resources, those resources such as personnel, state materials such as vehicles, and those resources associated with time management. (3) **customer service** is improved as more compliance inspections can be conducted. The non-human customer, the environment, is satisfied as there is a renewed focus on enforcement of those activities conducted without authorization.

For your ideas and proposals, to the extent that you can, try to provide:

- *A clear description of what you propose to do:*
Train and deploy ERP permitters to do the follow-up compliance inspections for as-built acceptance, follow-up compliance and any required enforcement actions.
- *Identify resources and key activities needed for the project:*
Training on compliance/enforcement activities, documents and procedures is necessary, can be done as on the job training by working initial cases with an existing compliance/enforcement specialist, can also be done with periodic training meetings and case sharing.
- *Define the benefits and try to identify key performance metrics that would define success:*
Improved Permittee cooperation as they have grown comfortable and trusting of the staffer during permitting, more familiarity with the details and history of any project or property. Staying in touch with the Permittee during construction and

operation is likely to cause increased compliance rates which can be shown by comparing inspection compliance rates from the c to g approach vs the separate compliance sections efforts. This also frees them up to do more timely work on issues of compliance and enforcement other than the recently permitted, of which there are many legacy and other complicated cases.

- *Estimate the amount of time needed to implement the project (proposed start and end dates):*
Estimate 6 months to get permit staff trained up as identified, 1 year to get meaningful metrics.
 - *Estimate projected savings in time, resources, and/or cost:*
Once we see how many additional inspections we can get from the permittees, we can calculate and average cost per inspection and provide a cost benefit as well as a time benefit.
 - NED, SLERP, STATE LANDS SECTION SUBMISSION
In 2008, a dedicated State Lands Section was established within the Northeast District's Submerged Lands Environmental Resources Program. This section has been tasked with the administration (maintenance) of existing proprietary authorizations (Sovereign Submerged Lands Leases & Easements) that were issued through the Department's Bureau of Public Land Administration (acting as agent to the Board of Trustees of the Internal Improvement Trust Fund). This section is also responsible for processing stand alone Proprietary Authorizations derived from non regulatory (permit) linked authorizations.
- 1. Efficiency**
- Upon the establishment of this section, Lean principles were applied to the existing State Land records, resulting in a sustainable, organized filing system that saved time in locating information on a day-to-day basis. The new system not only improved overall accuracy and effectiveness in providing the required historical resources necessary to maintain existing authorizations, but benefited compliance and enforcement efforts that often need historical information, drawings and notes to accurately evaluate an issue. This sustainable efficiency was recognized State-wide by the presentation of the 2010 Prudential-Davis Award for Productivity.
 - Overall, a dedicated section has increased compliance with State Lands Only enforcement cases that has generated increased revenue for the State. Having dedicated staff that focuses on the specific proprietary issues has resulted in maximum efficiency and effectiveness in compliance and enforcement case resolutions.

2. Effectiveness

- With a dedicated State Lands Section, "State Lands" Compliance and Enforcement efforts have dramatically increased with a total of \$310,348.28 having been collected from lease fees in arrears assessed and received since the establishment of the section. Having dedicated staff to administer this compliance and enforcement has also resulted in many cases being resolved without formal enforcement which has saved staff time, potential litigation costs and provided excellent customer service.
- State Lands Section staff has worked with both Permitting and Compliance & Enforcement staff to create cross training opportunities for the entire Program. Such joint efforts result not only in the growth of personal knowledge for each participant, but allows day-to-day utilization of cross trained personnel in a variety of situations, saving time and resources for the Program, and providing increased customer service through timely response.

3. Customer Service

- The State Lands Section has been able to provide direct, quick & reliable responsiveness to the needs of existing & potential lease/ easement holders. Serving as a local contact has provided many opportunities to assist local appraisers, attorneys, realtors and citizens needing assistance with authorizations pertaining to the use of sovereign submerged lands. The Section is also able to provide a higher level of internal customer service by serving as the local anatomy (eyes/ears) for the Bureau of Public Land Administration.

For your ideas and proposals, to the extent that you can, try to provide:

- *A clear description of what you propose to do:*
Establish a dedicated State Lands Section within the Submerged Lands Environmental Resources Programs of each District. This section would be tasked with the administration (maintenance) of existing proprietary authorizations (Sovereign Submerged Lands Leases & Easements) that have been issued through the Department's Bureau of Public Land Administration (acting as agent to the Board of Trustees of the Internal Improvement Trust Fund). This section is also responsible for processing stand alone Proprietary Authorizations derived from non regulatory (permit) linked authorizations and handle compliance and enforcement associated with lease/easement non compliance as well as all State Lands Only cases derived from the Regulatory C/E.
- *Identify resources and key activities needed for the project*
Staff resources are primary to the success of this project. A manager to provide oversight is necessary along with an Environmental Specialist & OPS

Inspector who can process documentation and conduct the actual compliance and enforcement activities required to ensure compliance with State Land authorizations.

- *Define the benefits and try to identify key performance metrics that would define success*

The benefits will come in the form of increased revenue for the State and improved protection of its natural resources. Having dedicated staff that focuses on the specific proprietary compliance & enforcement issues will result in maximum efficiency and effectiveness in case resolution which translates in improved protection of the water resources of the state. Compliance and Enforcement metrics can easily be established to track & substantiate the revenue increase.

- *Estimate the amount of time needed to implement the project (proposed start and end dates)*

This project can be implemented within a short amount of time however to achieve the maximum benefits could take 1-2 years.

- *estimate projected savings in time, resources, and/or cost*

By utilizing Lean principles in the organization of the section cost & time savings will be realized in the amount of staff required and the time saved in compliance and enforcement case resolutions. It should be noted the implementation of this proposal is estimated to increase revenue generated for the State by a minimum of \$50,000 to \$100,000 annually.

4. Integrating Multi Agency regulations and Targeting Constituencies

Obtaining authorization to build something in Florida or any other state can be a daunting task. Multiple agencies are involved in regulating various aspects of a construction project.

No single agency oversees the entire project from start to finish.

The Building Official administers the Florida Building Code.

The County Health Department is responsible for administering the Department of Health regulations for drinking water wells and onsite sewerage treatment systems.

If the construction also requires a wetland impact, the owner must seek permits from no less than 3 (4*) agencies.

But independent reviews cause duplicity, plan redesigns, time delays, and cost overruns for the construction contractor and the design consultants and ultimately the property owner.

Actively seeking out these applicants as early as possible in the overall

construction permitting process could save the property owner and DEP a lengthy permitting process or a costly enforcement action.

I believe that recent events in the Aquatic Preserve (LOF 2010-244) has brought our program a lot of media attention, particularly in the field of real estate. We should take advantage of this and expand our outreach efforts to the real estate community. SLERP should be a priority on the due diligence check list. Wetlands are currently item 5(c) on the Sellers Real Estate Disclosure Statement published by the Florida Association of Realtors. Prospective buyers of vacant property typically contact the county building and zoning departments to determine the viability of construction on property before they purchase it. No one asks about the dock. Title insurance does not cover docks over sovereignty submerged lands. Due to our limited outreach efforts, our office is increasingly contacted by prospective buyers, real estate agents, construction contractors, and we have a cooperative relationship with a few of our county building officials and health departments. This momentum should be capitalized upon. Proprietary authorizations, environmental assessments and the hydrologic condition of the property should be a high priority to prospective buyers and their representatives, not an unpleasant surprise or unanticipated expense and time delay after-the-fact.

With pretty good name recognition (perhaps confused with EPA), why is ignorance of DEP a cause of violations? Most folks contact the county building official for permitting determinations. How often are they informed about DEP? Only two of the counties within the NED issue building permits for docks or fill within the water or within flood prone areas. This is in contradiction to the Florida Building Code for floodplain management construction standards and federal law under the National Flood Insurance Program.

There is a positive correlation between these areas and the wetlands and surface water jurisdictional areas regulated by DEP. Most counties fail to refer applicants to DEP before issuing building permits. The result is, at best, an independent review of their project causing duplicity, plan redesigns, time delays, and cost overruns for the construction contractor, design consultants and the property owner. At worst, the property owner and the contractor are embroiled in a costly and mostly avoidable enforcement action by DEP.

These are the cases that get the attention of elected officials; cost the property owner unanticipated expenses, and cost the state resources in field staff to investigate, general counsel staff to assist in the application of administrative law settlements and unfortunately, litigations.

- *How can this be avoided?*
 - 1) Improve our profile for targeted audiences.

- *How do we know we are improving our profile?*
 - 1) Decrease the number of violations, or inversely, increase the rate of compliance.
 - 2) Increased contact from unique customers.

Improve the rate of compliance for permitted and non-permitted construction activities.

Determine how many "significant out of compliance" determinations are made per complaint received.

Determine how many "significant out of compliance" determinations are made per permit compliance inspection.

- *How to improve the rate of compliance?*
 - Targeted marketing.
 - Standardized metrics state wide.
 - Select audiences that will advance the objective.
 - Standardized spiel that specialized customers are given when they contact DEP.
- *Who is our market?*
 - Real estate professionals.
 - Individuals looking to purchase property.
 - Permittees.
 - Construction professionals.*
 - County and municipal building departments.

- *Direct marketing*

Example 1:

Real estate offices. Most real estate offices have regional branches that welcome guest speakers to their monthly staff meetings. There are also regional realtor associations.

Example 2:

Permittee. *Cradle to grave permitting (broadening the compliance effort to include permitting staff.) will allow for enhanced customer contact post permit issuance, including reminders of specific conditions or other expectations and identifying the particular contractor etc.

*And the not-so-professional, unlicensed contractors, dirt hauling, land clearing, etc.

Increased contact from unique customers.

- Determine number of customer education calls conducted last month.
(Survey gismo to our own staff)
- How many education spiels did you give last month?
- How many real estate professionals did you speak with?
- How many construction contractors did you speak with?
- How many county administration staff did you speak with?
- Determine the number of missed opportunities.
- Determine how many are unique contacts.

- Target the average number of unique contacts as monthly goal.

We provide a service; we should get credit for the volume and quality of service that we provide. Is an inspection a service that our customers associate with good value? Probably not. Helping a customer avoid a costly mistake? Yes.

Be visible! T-shirts! Cop on the beat methodology of law enforcement.

Be visible to the targeted community and seek out opportunities to engage with the active members of that community.

NED has formally and informally made advancements in these areas. Now is the time to expand it, measure it, and get recognition for it.

For your ideas and proposals, to the extent that you can, try to provide:

- *A clear description of what you propose to do*
Improve the rate of compliance with environmental laws through target marketing of constituencies and improved presence and profile of our agencies requirements both with other agency efforts and independent institutional groups.
- *Identify resources and key activities needed for the project*
Dedicate existing compliance and enforcement staff and resources to greater and more tracked interactions with outside groups, especially realtors, builders and county governments.
- *Define the benefits and try to identify key performance metrics that would define success*
Prevents violations from occurring to begin with and avoids costly enforcement both to agency staff developing litigation cases and the regulated community that incurs corrective actions costs and fines. Metrics described above include tracking contacts with these key constituencies and matching that to a potential reduction of violations in their span of control.

- *Estimate the amount of time needed to implement the project (proposed start and end dates)*
3-4 months to develop statewide metrics and SOP for talking points to specific constituencies.
- *Estimate projected savings in time, resources, and/or cost*
It would save the costs of enforcement case development and prosecution for those violations averted.

WASTE:

1. Efficiency:

- *COMET Entry*

The Compliance & Enforcement Tracking (COMET) System Entry team developed a procedure that improved the COMET system entry process, saved money, and improved public access to important information. COMET is the database system for DEP's Waste Cleanup Section and is used to internally track the cleanup progress of contaminated sites. Information from the COMET system is imported into the State's Contamination Locator Map (CLM.) The CLM is an on-line tool that allows the public to locate waste cleanup on any identified location on a Florida map and provides users with real-time information on line. The procedure developed by this team streamlines the COMET data entry process and reduces the time that technical staff spends updating the database and/or fixing errors in the database by 97.5%. The new procedure results in an annual cost savings of \$15, 817.

- *Scanning Archive Files into Oculus*

As part of its internal annual stretch goals program, NED is in the process of scanning all back-file information that is currently archived offsite. The scanned documents are being inserted into OCULUS to become the Department's documents of record. This project will result in cost savings to the Department by reducing offsite file storage costs. In addition, this file information will now be more readily available to the public and Department via the internet.

2. Effectiveness:

- *Storage Tanks & Petroleum Cleanup Program*

In an on-going effort to ensure consistent rule interpretation statewide, NED and the other districts are working with the contracted local programs, the Storage Tank Regulation Section, and the Office of General Counsel to eliminate Program inconsistencies. This effort has already resulted in the completion of a guidance document that addresses Breach of Integrity testing of double walled USTs, double-bottomed ASTs, and

underground double walled piping. The guidance document is available to all interested parties on the Department's Storage Tanks homepage. Currently, this workgroup is developing closure assessment guidance. These guidance documents help to ensure better statewide consistency and improved customer service.

- *Drycleaner Initiative*

In May 2011, the NED Hazardous Waste Section mailed over 120 multimedia compliance assistance packets to drycleaners. The information packets were mailed to every dry-cleaning facility in the Northeast District that registered with the Dry-cleaning Solvent Cleanup Program or notified DEP that it generates hazardous waste. The letter included with the packet clearly described the various regulations that apply to drycleaners, listed internet links to more detailed information, and encouraged drycleaners to contact DEP staff if they have specific program questions and provided DEP contact names and telephone numbers. Each packet also included a Dry cleaning Facility Compliance Assistance Brochure. This extra customer service effort should result in improved compliance at drycleaners and fewer releases of dry-cleaning solvents into the environment.

- *Consolidating Solid Waste Permits*

Beginning about two years ago, we began consolidating all of a facility's solid waste permits into one permit. Prior to that, due to new rules regulating additional solid waste activities over the years and/or the facilities adding new solid waste management activities midway through the life of another permit, rather than give up the remaining life on an existing permit, some facilities got brand new permits and ended up with several solid waste permits. By encouraging facilities to submit early renewal applications and/or intermediate modifications, we were able to combine most facilities' solid waste permits into one permit. This enabled facilities to submit all the needed application information for multiple activities at one time rather than having to submit repetitive information every year for a different application. While the initiative created a heavier work load for NED in the short term, the mid- and long-term effects have been a savings in time and engineering fees for the facility; savings in review time for DEP; and improved environmental compliance by providing a single permit document containing all the solid waste requirements.

- *General Permits for Waste Processing Facilities*
NED is working actively with the Solid Waste Program in Tallahassee to reduce permitting requirements for indoor waste processing facilities (WPFs) with leachate control systems. Specifically, we are proposing to allow WPFs to operate under general permits, which are granted by rule, rather than more onerous individual permits. The rationale is that the important construction and operational criteria of such WPFs can be standardized, and if the facilities meet those criteria, they should create negligible environmental risk. Tallahassee is in the process of initiating rule-making to authorize this reduced regulatory approach.
- *General Permits for Waste Tire Collection Centers*
NED is in favor of deregulating the permitting of waste tire collection centers. Specifically, we propose eliminating the requirement for waste tire collection centers to have individual permits; instead, they should be authorized through a simple registration process. The waste tire rule already spells out construction and operational criteria and waste tire collection centers have negligible environmental and/or public health risks. Unfortunately, this deregulation may require a statutory change before this proposal could be implemented.
- *Navy Partnering*
The Northeast Florida Environmental Compliance Partnering Team, comprised of NAS Jacksonville, Naval Station Mayport, Fleet Readiness Center Southeast, Naval Facilities Engineering Command Southeast, St. Johns River Water Management District, the City of Jacksonville, and NED, continues to meet quarterly. The Team's most important success has been improved communication and trust. By openly discussing environmental issues before they become serious problems, the Team has been successful in reducing violations and improving environmental compliance. Specifically, a workgroup of the Northeast Florida Environmental Compliance Partnering Team evaluated recurring hazardous waste violations, identified root causes, and made recommendations for improvement. By implementing the recommendations, the Team successfully reduced the number and severity of recurring hazardous waste violations at both NAS-JAX and Mayport to the extent that formal enforcement with penalties has not been needed since 2009. (Prior to 2009, DEP routinely had to initiate formal enforcement against one or both of the facilities.) Similarly, DEP successfully partnered with the U.S. Navy, U.S. Army Corps of Engineers, and City of Jacksonville to excavate and remove Navy metal debris discovered in a 200 by 400 square yard area in the surf at the City of Jacksonville's Huguenot Park. The affected property is owned by the

Board of Trustees. The major concern was public safety because several surfers had been injured by the debris. District Director Strong convinced the City to agree to use a \$59,475 in-kind penalty (from air violations at the City's landfill) to hire a contractor to excavate and remove the debris and DEP's Chief of Staff persuaded the Navy to contribute \$20,000 to help pay for the debris excavation, in addition to paying its recycling contractor to collect the debris in roll-off containers and recycle or dispose of the debris. DEP and the City prepared a work plan for the excavation and removal of the debris. The metal debris and hazardous material at Huguenot Park were removed before the start of turtle nesting season and summer beach season. Approximately three roll-off containers of debris were removed and were disposed of in the Trail Ridge Landfill because the debris was not readily recyclable. The City agreed to pay an additional \$15,000 to complete the excavation and the Navy paid an additional \$10,000 for disposal costs.

3. Customer Service:

- *Customer Outreach & Training*

Over the past year, NED Hazardous Waste Section staff has trained over 350 external customers at a total of 16 meetings, classes, or workshops. Training topics have included hazardous waste, used oil, universal pharmaceutical waste, and the DEP inspection and enforcement process. An inspector was able to train 160 people at a single training event at Cecil Field in February 2011. Workshops in Gainesville, Lake City, and Starke were conducted in coordination with county small quantity generator programs during a three day period in February 2011, with several inspectors participating. HW staff also held an internal training event for NED staff on inspection procedures and report writing. There were 43 in attendance at that 3-hour training session in January.

WATER:

The following projects were implemented in the wastewater section from 2007 to present:

1. Efficiency:

- Value stream mapping to reduce cycle time from the inspection date to report delivery -180 days to 30 days.
- Kaizen event to reduce enforcement processing time from 300 days to less than 180 days.
- Lean event for permitting to reduce time to process to 90 days.

2. Effectiveness:

- General and Violation based operator training (outreach) events - Over 200 license operators (SNC from 15% to less than 5%)

- Permit forecasting tool to organize internal resources (project assignments) and schedule pre-application meetings – reduce number of RAI's
- Post permit issuance outreach to facilities – increase understanding of permit conditions and improve compliance.

3. Customer Service:

- Voice of customer surveys to get feedback and suggestions from operators, consultants and facility owners.
- Facility specific outreach activities based on noncompliance route cause.
- Outreach training to local schools and colleges – wastewater certification classes.

The following concepts are being evaluated in 2011:

3. Value Definition:

- Permit – What is the objective? is it necessary? Are they eligible for a ten year permit? E-permit for general and generic? Sampling requirements?
- Inspection Report – Check list? Electronic?

4. GAP analysis:

- Evaluate compliance history and determine noncompliance route cause.
 - i. Permit conditions – too vague
 - ii. Operator training.
 - iii. Owner resource allocation.
 - iv. Infrastructure – too old.

5. Resource Optimization (aka cost reduction):

- Evaluate outcomes vs. outputs and align resources accordingly – facilities with a noncompliance history should get the most attention.
- Inspection frequency – reduced based on compliance history.
- Longer permit duration – 5 to 10 year permits (non-NPDES facilities with less than 100k).
- Automatic permit renewals based on compliance history.
- Fast track or expedited permit review incentive for facilities with a good track record of compliance – Reward good conduct.
- Sampling frequency reduction – good history.

Ford, Victoria

From: Strong, Greg
Sent: Thursday, July 07, 2011 11:25 AM
To: Kirts, Christopher; Maher, Jim; AlNahdy, Khalid; Long, Melissa M.; Fitzsimmons, Michael
Cc: Conway, Jodi
Subject: FW: RE: Strategic Planning, regulatory proposals
Attachments: Regulatory Strategic Priorities_combined.docx

FYI.

Thanks to all who provided input for this.

Your ideas and recommendations for high-level improvements were excellent!

Gregory J. Strong
Director, Northeast District
Florida Department of Environmental Protection
Ph: (904)-256-1504

From: Mansfield, Geoffrey
Sent: Wednesday, July 06, 2011 5:15 PM
To: Steverson, Jon
Cc: Littlejohn, Jeff; Gaskin, Carla A.; Strong, Greg; Hamilton, Shawn; Garfein, Vivian; Prather, Jeff; Iglehart, Jon; Vazquez, Pamala; Creech, Jill; Caspary, Jorge; Bartlett, Drew; Thomasson, Mark; Halpin, Mike; Fenton, Katy; Ferris, Julie
Subject: RE: Strategic Planning, regulatory proposals

Jon,

Attached are the strategic issues and proposals from the regulatory programs for purposes of next week's meeting. Jeff has reviewed. Other than some minor edits (Jeff's) and minor formatting to get them in one document (mine), these are the work of the districts and divisions as submitted. I'm sharing them back with their "sponsors" so they can digest the whole and prepare for next week. I imagine they'll have thoughts on these issues and other ideas by then. If you have questions, let us know. Thanks.

Geof

Draft Regulatory Strategic Priorities July 2011

Central District

Action	Proposal	Program	Results
Eliminate	DEP regulatory oversight of actions that do not significantly impact public health or the environment, for example, <i>yard trash processing facilities</i> and <i>waste tire haulers</i> .	Waste	<ul style="list-style-type: none"> • Less regulatory burden on such facilities (i.e. inspections, reporting, etc.) • Waste management staff time can be re-distributed to other activities • Lends to both regulatory efficiency and cost reduction for District offices
Eliminate	Standards and minimum criteria pollutants to remove parameters that do not have much, if any, impact on human health. Examples: Total Dissolved Solids (TDS), iron and ammonia.	Waste	<ul style="list-style-type: none"> • Less regulatory burden (i.e. reporting, etc.) • Allows for better use of resources by regulated community • Reduction in review time by staff
Eliminate	Permitting for both collection and distribution systems, requiring registration and fee only.	Water	<ul style="list-style-type: none"> • Quick turnaround for applicants - minimal process • Maintain registration fee for such projects • District permitting staff could be re-allocated to monitoring/CE/compliance assistance
Eliminate	Permitting for vehicle wash systems. Create BMPs and registration for these types of operations.	Water	<ul style="list-style-type: none"> • Quick turnaround for applicants/start ups. • Less regulatory burden on such facilities (i.e. inspections, reporting, etc.) • Should speed up the review/issuance of other permitted activities by narrowing the permitting universe in industrial wastewater

Eliminate	Move environmental law enforcement investigators under the Attorney General's office.	Law Enforcement	<ul style="list-style-type: none"> • Cost reduction
Automation	Development of better online tools for permit submittals.	ERP	<ul style="list-style-type: none"> • Quick turnaround for applicants • Increased regulatory efficiency • Assures complete submittals / no requests for additional information
Automation	Automate required reporting: Annual solid waste quantity reports, existing capacity, and closure and long-term care estimates.	Waste	<ul style="list-style-type: none"> • Less processing / storage of paper files (data entry)
Automation	Continue to implement mobile electronic inspection equipment.	Water	<ul style="list-style-type: none"> • Greater regulatory efficiency • Less processing/ storage of paper documents
Automation	More web-based reporting for ARM reports: i.e. excessive emission reports.	Air	<ul style="list-style-type: none"> • Less processing/ storage of paper documents • Assures complete submittals / no requests for additional information • Customers can review data online
Automation	Provide web-based reporting for asbestos notifications.	Air	<ul style="list-style-type: none"> • Less processing/ storage of paper documents • Customers can review data online
Simplification	Eliminate Attorney General approval for extended term easements.	ERP/State Lands	<ul style="list-style-type: none"> • Quicker turnaround for applicants • Removes a step that is little more than a formality
Simplification	Allow applicants to provide money to a fund for public interest	ERP	<ul style="list-style-type: none"> • Greater consistency in public interest projects • Less process for regulated community resulting in quicker turnaround times

	projects vs. the applicant having to find such a project.		
Simplification	Combined permitting for landfills requiring permits from multiple programs (i.e. Title V)	Air/Waste/ERP	<ul style="list-style-type: none"> • One stop permitting for such facilities results in less process for regulated community
Simplification	Issue ten year permit for domestic wastewater plants that demonstrate history of compliance.	Water	<ul style="list-style-type: none"> • Incentive for compliance • Less burden on regulated community • Cost reduction to Department due to reduction in permit renewals
Simplification	Increase multi-media inspections for facilities regulated by more than one program.	Multi-program	<ul style="list-style-type: none"> • Reduces number of inspections performed at a specific facility (cost reduction) • Most District are capable of performing multi-program inspections (quick implementation time) • Encourages cross training among staff
Simplification	Reduce retention times for Department files.	Administration	<ul style="list-style-type: none"> • Reduces 1) management/storage of paper files and 2) conversion of archived documents to electronic versions (both cost reductions)

Northeast District

#1 STREAMLINED REGULATORY OVERSIGHT: Decreased perceived regulatory burden by minimizing duplicative efforts without adversely affecting environmental protection.

A. Dry Cleaners

Concept: The Hazardous Waste Program and Air Program both perform annual inspections of Dry Cleaners. The Hazardous Waste inspections are more detailed while the Air Program inspection requirements could be shifted to the Hazardous Waste Program.

Result: Eliminating the Air Inspections, reducing duplicative site inspections at the facilities and increasing customer service by providing Dry Cleaners with one Department point of contact.

B. Open Burning:

Concept: Shift all open burning responsibilities from the Air Program to the Department of Forestry. Forestry has open burning responsibilities that cannot be easily shifted to another program, however, the Air Program responsibilities are relatively minor including Air curtain Incinerators which could be handled by Forestry.

Result: Increase efficiency by assigning the responsibility to one Department. Increasing customer service by identifying one point of contact.

C. Crematories:

Concept: Shift Air Program inspection requirements to the Department of Financial Services, Division of Funeral and Crematory and Consumer Services.

Result: Reducing regulatory oversight by one regulatory Department.

#2 MORE EFFECTIVE PERMITTING: Focus our permitting approaches and efforts in a manner where we can be most effective and provide top notch customer service to the public.

A. Permit Forecasting

NED Experience: The Wastewater Permitting Section uses a proactive approach to project review and permitting. Domestic Wastewater plants are required to renew their permits every five years. To minimize the amount of unanswered questions received in these applications and to decrease the amount of time needed to process permits, the team uses permit forecasting to identify the plants due for a permit renewal. They contact the facilities and schedule a preapplication meeting where they explained to the facility exactly what information is needed in their upcoming submission.

Results: The result is that permits were submitted more complete than before the forecasting initiative and the amount of time a permit spent in the review process decreased by 12.75 days (a 26% reduction), saving more than \$71,000 in staff time (based on data collected in 2010).

B. General Permits for Waste Tire Collection Centers

Concept: Deregulating the permitting of waste tire collection centers. Specifically, eliminating the requirement for waste tire collection centers to have individual permits; instead, provide for authorization through a simple registration process. Unfortunately, this deregulation may require a statutory change before this proposal could be implemented.

Result: Our efforts would be more effective elsewhere, perhaps in spot checking or compliance as our issuance of General Permits does little to improve environmental protection because the waste tire rule already spells out construction and operational

criteria and waste tire collection centers have negligible environmental and/or public health risks.

C. General Air Permitting:

Concept: Convert several permitting actions that currently require construction permitting to "General Permits" or "Notifications of Action" by the facility.

1. Asphalt Plants
2. Compression Engines
3. Natural Gas Pipeline Industry Actions.
4. Poly Styrene Boat Industry Actions.
5. Air Curtain Incinerators
6. Small grit or sand blasting operations
7. Smaller Boilers

Result: This approach is much less onerous on the facilities when the permit is more simple in nature and allows the Department to focus on the more complicated permits and increasing time and resources to be spent in offering compliance assistance programs.

D. Title V Modifications to Air Permits:

Concept: Do not modify the Title V permit with every issued construction permit. Larger facilities, (EPA Title V), are required to modify their Title V Permit every time they receive a construction permit. Many of the larger facilities submit numerous construction permit applications throughout the Title V 5 year permit life to modify their operations.

Result: Reducing the permitting requirements for some of the minor modifications that do not affect environmental compliance will reduce some efforts for both industry and the Air Program.

E. Consolidating Solid Waste Permits:

NED Experience: Beginning about two years ago, we began consolidating all of a facility's solid waste permits into one permit. Prior to that, due to new rules regulating additional solid waste activities over the years and/or the facilities adding new solid waste management activities midway through the life of another permit, rather than give up the remaining life on an existing permit, some facilities got brand new permits and ended up with several solid waste permits.

By encouraging facilities to submit early renewal applications and/or intermediate modifications, we were able to combine most facilities' solid waste permits into one permit. This enabled facilities to submit all the needed application information for multiple activities at one time rather than having to submit repetitive information every year for a different application.

Result: While the initiative created a heavier work load for NED in the short term, the mid- and long-term effects have been:

1. a savings in time and engineering fees for the facility;
2. savings in review time for DEP; and
3. improved environmental compliance by providing a single permit document containing all the solid waste requirements.

F. Resource Optimization:

Concept: Non-NPDES wastewater facilities with a noncompliance history should get the most attention and those with better records should have a lesser inspection frequency – reduced based on compliance history. In addition, a longer permit duration – 5 to 10 year permits (non-NPDES facilities with less than 100k) may be issued for those with excellent compliance history.

Result: Staff time is used more effectively by focusing more attention on facilities with negative environmental impacts to bring them into compliance while an incentive is provided for facilities to be in good compliance by allowing for longer permit durations.

G. Cradle to Grave ERP Permitting/Compliance:

Concept: The **cradle to grave permitting and compliance** concept would deploy ERP permitters to perform the follow-up compliance inspections for as-built acceptance, follow-up compliance and any required enforcement actions for permits in which they were involved with. Staying in touch with the Permittee during construction and operation is likely to cause increased compliance rates which can be shown by comparing baseline inspection compliance rates to those following the implementation of this approach.

Result: Increase in the effective use of staff time because a permitter has seen the site pre-alteration, proposed impacts, and can resolve any compliance actions that resulted after those permitted activities have occurred with fewer site inspections, few resources and with less time spent recreating what happened and when. Customer service is improved as the permittee can speak to someone who is familiar with their original permitting situation.

#3 ENHANCED COMPLIANCE ASSISTANCE: Focus our compliance enforcement approaches and efforts in a manner where we can be most effective and prevent environmental impacts while providing excellent customer service.

A. Environmental Compliance Partnering Initiatives:

NED Experience: The Northeast Florida Environmental Compliance Partnering Team, comprised of NAS Jacksonville, Naval Station Mayport, Fleet Readiness Center Southeast, Naval Facilities Engineering Command Southeast, St. Johns River Water Management District, the City of Jacksonville, and NED, meets quarterly. By openly discussing environmental issues before they become serious problems, the Team has

been successful in reducing violations and improving environmental compliance. Specifically, a workgroup of the team evaluated recurring violations, identified root causes, and made recommendations.

Results: By implementing team ideas and recommendations, the number and severity of recurring hazardous waste violations at both NAS-JAX and Mayport decreased to the extent that formal enforcement with penalties has not been needed since 2009. (Prior to 2009, DEP routinely had to initiate formal enforcement against one or both of the facilities.)

The Team's most important success has been improved communication and trust. The partnership has led to proactive handling of potential environmental compliance issues.

B. Targeted Industry Education:

NED Experience: The Wastewater section ensures that wastewater dischargers, including industries and domestic wastewater plants, meet state requirements for discharging wastewater. This is typically done through file reviews, compliance inspections, and water quality sampling. The Wastewater Section identified an opportunity to proactively address issues industry-wide rather than addressing them after they occur. To increase compliance rates for common violations, they initiated monthly training targeted at the more common violations.

Results: During the first eight months in 2010, they trained more than 70 facility operators and provided 23.5 Continuing Educational Units to those operators, which is valued between \$200-275 per CEU. Compared to the previous year, noncompliance rates decreased from 15% to 5% and from 48% to 36% for minor noncompliance. This was calculated to have avoided 544 hours of staff time spent bringing a noncompliant facility into compliance (an estimated salary savings of \$11,424).

#4 INCREASED FOCUS ON STATE LANDS/CREATION OF NEW SECTION

NED Experience: In 2008, a dedicated State Lands Section was established within the Northeast District's Submerged Lands Environmental Resources Program. This section has been tasked with the administration (maintenance) of existing proprietary authorizations (Sovereign Submerged Lands Leases & Easements). Having dedicated staff that focuses on the specific proprietary compliance & enforcement issues will result in maximum efficiency and effectiveness in case resolution, which translates in improved protection of the water resources of the state.

Results: With a dedicated State Lands Section, "State Lands" Compliance and Enforcement efforts have dramatically increased with a total of \$310,348.28 having been collected from lease fees in arrears assessed and received since the establishment of the section. This approach has also resulted in many cases being resolved without formal enforcement, saving staff time and potential litigation costs and providing excellent

customer service. The State Lands Section has been able to provide direct, quick & reliable responsiveness to the needs of existing & potential lease/easement holders.

The benefits will come in the form of increased revenue for the State (increased lease fees being paid) and improved protection of its natural resources. Compliance and Enforcement metrics can easily be established to track & substantiate the revenue increase.

South District

Our Core Mission

- The protection of public health and natural resources of Florida
- Carryout the Divisions' and EPA's regulatory responsibilities (i.e. Air Resource Management, Water Resource Management incl. ERP, Waste Management, Environmental Assessment and Restoration, & Administrative Services)
- Support the Governor's 7-7-7 Plan for business growth and promotion of governmental programmatic and operational efficiencies
- Provide exceptional customer service

Our District Snapshot

- Main District Office located - Lee County in the City of Ft. Myers
 - Branch Office - Monroe County in the City of Marathon
- Regulatory Area of Responsibility - Counties of Lee, Collier, Monroe, Charlotte, Glade, Highlands, and Hendry

Regulatory Programs	FTE	OPS
○ Air Resource Management	11.5	0
○ Water Resource Management	29	4
○ Waste Management	18.5	1
○ Environment Resource Permitting (ERP)	25	3
○ Environmental Assessment & Restoration (EAR)	6	2
• Regulatory Support - Administration	12	3

Total Staffing - FTE: 102 OPS: 13

Our Strengths

- Educated and dedicated professional staff focused on completing mission objectives in the most efficient and timely manner possible. **(Supports Steps 2, 3 and 4 of the Governor's 7-7-7 Plan)**
 - Over 20 South district individual and team cost reduction efforts have been recognized by the Florida TaxWatch Davis Productivity Awards in the past three years. *(This organization's mission is to ensure the citizens' tax dollars are utilized in the most effective and efficient manner and they ensure there is accountability in state government.)*
 - Staff cross-trained to perform multiple types of inspections while on site at a facility. Reduces redundancy of efforts and interruptions of a business entity, maximizing tax payer dollars
 - Community involvement and support. SD staff #1 in terms of giving in 2010 United Way Campaign
- Team approach to ensure Department core mission is accomplished **(Supports Step 2 of the Governor's 7-7-7 Plan)**
 - Provide permitting/compliance assistance to other Divisions and Districts when needed
 - Share specific regulatory burdens with other districts to reduce overlaps, redundancy in staff needs (Sugar, CAFO's)
 - Provide assistance to Department response needs (hurricanes, BP Oil spill, etc.)
 - Coordinate and facilitate both external and internal stakeholders' interactions to address and resolve issues within our region (algae, etc.)
- Strong customer focus **(Support of Steps 3 and Step 4 of the Governor's 7-7-7 Plan)**
 - Establish and maintain partnerships with business and business development organizations within the region
 - Provide training and technical support to the regulated, consulting and operational communities to increase compliance. (WWTP operators training, Asbestos seminars for demolition contractors, etc)
 - Strongly encourage Pre-application meetings to reduce application processing times
 - Focused outreach programs (household pharmaceuticals, fluorescent lamp management, school chemistry labs, etc.)
- District-wide deployment of technologies to enhance operational and programmatic efficiencies and improve customer service **(Supports Step 2 of the Governor's 7-7-7 Plan)**
- Centralized budget approach **(Supports Step 2 of the Governor's 7-7-7 Plan)**

- Fiscally conservative
- Management oversight of planning and expenditures

Our Challenges

- Organizational structure not optimal to promote overall operational and programmatic efficiencies.
- A three to five year cyclical permitting workload.
- Addressing unresolved State Submerged Lands cases (in-house greater than 5 yrs)
- Addressing State Submerged Lands case projects not currently under lease
- Streamlining of the Legal Case Tracking (LCT) Accounts Receivable process.
- Coordination between Department, the Water Management District and Army Corps of Engineers.

Our Priorities

- Flatten the organizational structure and promote operational efficiencies (**Supports Steps 1 & 2 of the Governor's 7-7-7 Plan**)
 - Reduce layers of supervision and increased employee-to-supervisor ratios
 - Streamline programmatic operations
 - Enhance communications by eliminating layers of management and supervision
- Reclassification and realignment of staff positions in response to cyclical workload (**Supports Steps 2 of the Governor's 7-7-7 Plan**)
 - Cross train staff in multiple disciplines
 - Reduce numbers of staff required to conduct inspections
 - Maintain response capabilities to emergency issues (hurricanes, BP oil spill, etc.)
- Focus on operational and fiscally responsible decision making in all programs.
 - On demand purchasing, at competitive fair market pricing
 - Vehicle, phone support system, etc.
- Support business development and sustainability (**Supports Steps 2, 3 & 4 of the Governor's 7-7-7 Plan**)
 - Train regulated operators and consultants for mutual benefits to both private and public sectors (cost, time savings)
 - Assist "start up" businesses with regulatory "know-how" to reduce need for regulatory oversight
 - Proactive engagement with the regulated community to provide reduced need for regulatory follow up and enforcement activities.

- Enhance current business development partnerships in coordination with the DEP Bureau of General Services

Our 5 Year Forecast

- The South District has an abundance of vacant commercial/industrial facilities and an abundance of attractive affordable homes. The District is anticipating growth as a result of the 7-7-7 Plan in the following areas:
 - Bio-Fuels and Alternative Energy
 - Light manufacturing
 - Light industry
- Anticipate continuation of cyclical permitting workload
 - Shift staff and resources as appropriate (state lands compliance backlog, Fl Keys well plugging and abandonment, etc.)
 - Work with divisions and districts to provide assistance to address regional needs without additional costs to the state
- Current staffing needs are based upon existing Division work plans as of 6/2011. It is anticipated these needs may change as a result of the upcoming Department-wide strategic planning.

Meeting our needs with reduced resources

- Refer to Attachment Labeled "South District Strategic Staffing Priorities"

Southeast District

Identify Core Missions of FDEP-suggest that all Planning initiatives be given the "Core Missions Test" prior to acceptance:

- Identify non-core activities
 - Establish implementation plans with time frames to remove non-core activities from purview of FDEP
1. Agency Geographic Structure in view of Core Missions:
 - Redistricting to even out population, etc., re-evaluate?
 - Main office/branch office locations, functions, re-evaluate?
 2. Relationship between Tallahassee Division Directors, District Directors and District Program Administrators:
 - What is the current relationship/interaction?
 - What do we want /need it to be to optimize our Core Missions?
 - How do we do it and what is time frame?

3. Agency Personnel Organizational Structure-using guidelines established from 1,2,3 above:
 - Headquarters Organizational Structure
 - Districts Organizational Structure
4. IT Systems, ie, Oracle, PA, Oculus:
 - Identify what we really need to get from our IT systems to accomplish Core Missions
 - Identify issues/problems with existing systems
 - Identify potential solutions
 - Prioritize and establish time frames for completion
 - Have DEP in-house IT talent develop programming to maximize e-permitting capabilities,ie, e-permitting used by SFWMD
5. Lean Processes:
 - Conceptualize implementation-update progress to date (NE district to highlight latest accomplishments?)
 - Determine specific initiatives with time frames to be implemented across all Districts
 - Develop protocol to disseminate and incorporate consistently State wide
 - Centralize all Records/scanning for SED to WPB, maximize administrative staff to get done as quickly as possible. This will also significantly decrease space needed in PSL
6. Outreach programs, evaluate and either reduce or eliminate

Southwest District

SWD Electronic Initiative

Background on Electronic Permitting:

In January 2009, Southwest District (SWD) Water Facilities (WF) began an electronic permitting initiative. Prior to the onset of this initiative all permits were sent hard copy; however, in 2010, 96% or ~1,260 documents were signed and processed electronically and to date in 2011, 97% or 764 documents were signed and processed electronically. Of these 764 documents, all went 100% electronically. Of the remaining 3% that went out hardcopy, most had only one copy going hardcopy while the rest were sent electronically.

The SWD WF's permitting group has been provided signature pad's to be utilized in this process. Presently cost savings are averaging \$17,400 per year in supplies and labor costs. Since implementation the copies produced have dropped from 40,000 to 28,000 per month. In addition to the supplies and staff time savings, in the past two years SWD WF has been able to reduce the copier/printer leases from three machines to two. This results in an additional ~\$3,000 in savings annually that is not included in the ~\$17,000/year.

✓ **TOTAL SAVINGS: \$20,000 plus/year**

WF - Electronic Compliance/Enforcement:

We recently have been able to provide the remaining SWD WF's staff and the Acting District Director with the signature pads, thus allowing the SWD to expand the electronic permitting effort to all areas of WFs. With the Compliance/Enforcement section coming on board, the annual savings are expected to increase significantly. The electronic permitting initiative reduced monthly copies ~12,000/month. In the event expanding the electronic initiative to Compliance/Enforcement reduced copies by a similar amount which would be a 50% reduction, the cost of the hardware and software is expected to easily be recouped in less than 4 months. This is due to additional staff, especially professionals as compared to clerical, utilizing the electronic process. In addition the number of Compliance/Enforcement documents sent electronically could easily be much greater than 50% given OGCs recent determination that electronic signatures are acceptable on legal documents. Presently, OGC is developing standard language for electronic legal documents.

Electronic Routing Procedure:

In the addition to the above electronic process, the Water Facilities program has recently initiated an electronic routing procedure in both Permitting and Compliance/Enforcement. Prior to Oculus, staff would print electronic documents for review & signatures and then scan to be sent electronically to the customer. Since Oculus was implemented in Water Facilities, requiring all live documents to be inserted into Oculus in an electronic format, the need to eliminate redundancy has become necessary. When Oculus went live Water Facilities staff sent emails to their facilities asking, that whenever possible documents be routed electronically. This not only saves the customer time and money but ensures the Department receives documents in a timely manner. The customers have taken to this request eagerly and now Water Facilities receives large number of incoming documents electronically which presently have not been quantified. All documents received and/or created electronically are routed for review and processing via email. The electronic documents are kept on local drives, allowing all staff access and an email stating the document is ready for review is sent. The email lists staff that it will be routed to, the document, and any additional information necessary. The email includes a hyperlink, linking staff directly to the document that is being reviewed. Finally, the email is flagged to the recipient for their review, providing a deadline and reminders of the action needing to be taken. This procedure has further streamlined the review process and allowed staff to get the final agency documents to the customers in an expedited manner. To date the process has allowed 68% of the documents to be inserted directly into Oculus, which will give the public instant access to public records.

2009 Davis Productivity Awards:

The Permitting Support Staff in Water Facilities received a Certificate of Commendation through the Davis Productivity Awards for implementing a paperless system that cut costs significantly in a short period of time. Adapting and implementing this system saved the

Southwest District Water Resource Management Section an estimated \$4,919.63 in paper and postage costs, as well as an estimated \$3,795.00 in staff costs in just a six month period.

Key Action Steps & Deadlines:

Implement similar electronic initiatives into the remaining SWD programs (AIR, Waste Management, & ERP).

- ✓ Potential cost savings of: \$80,000 plus/year
- ✓ Initial introduction and first steps of implementation – End Of FY 2011-2012

SWD Scanning Initiative

Background:

The Southwest District was the first regulatory district to commit to developing a “scanning initiative”, and began scanning documents in 2003.

To date, staff has entered approximately **3.7 million pages** of scanned documents into both Alchemy and OCULUS.

- Scanned 1908 total cubic feet of paper
- Equals 191 five-drawer filing cabinets

This effort has resulted in better customer service as our documents are easily accessible to the public, and it has also saved costs by minimizing the amount of storage space both at our facility and at an off-site storage unit. (See attachment for monthly performance evaluation)

SWD continues to build on its scanning efforts and now has staff (both FTE and OPS) scanning in its Waste Management and Water Facilities Programs, as well as those staff members which man the SWD Scanning Program.

Key Action Steps & Deadlines:

Currently: Coordinate efforts between SWD scanning team and individual programs to continue streamlining efforts such as QA/QC to maximize performance.

Continue coordination with Tallahassee to implement scanning into remaining programs of AIR and ERP.

Customer Outreach/Education Initiative

The SWD has initiated a series of workshops with the AIR, Water and Waste Programs to assist small business owners with rules and regulations that will help them stay in compliance.

In the past 18 months, workshops have been held with Asphalt plants and Crusher Facilities, Concrete Batch Plants, and Dry Cleaner facilities.

Key Actions Steps & Deadlines:

FY 2011-2012: Continue to assess customer needs and schedule outreach/education opportunities. Future potential workshops may include: single family dock building, mangrove trimming/permitting rules, above ground storage tanks, and emergency generators.

Picture: Dry Cleaner Workshop of 61 participants (AIR & Haz Waste)



Air Resource Management

DARM Priorities

1. Reduce Costs
2. Increase Efficiency
3. Lower Fees/Taxes
4. Hold Government Accountable

DARM Specific Recommendations

- 1) Reduce Costs
 - a) Reduce discretionary expenditures (e.g. travel, office furniture & supplies): By July 2011
 - Utilize surplus office furniture where practical
 - Require Division Director approval for discretionary expenditures above \$50.00
 - o Measure by comparing average discretionary expenses from prior years with current year
 - o Projected Savings: 5% reduction in discretionary expenditures
 - b) Reduce staffing levels by 5%: By December 2011

- Accomplish through reorganization and attrition
 - Measure by calculating the % of reduction in FTEs for 2011 Calendar year
 - Projected Savings: 5% reduction in staffing levels
 - c) Seek more cost-effective ways to execute functions (permitting/compliance/ambient monitoring)
 - Hire 2 full-time Benchmarking Specialists for Division: By July 2011
 - Evaluate out-sourcing of tasks: By December 2012
 - Identify non-essential tasks: By December 2012
 - Refine scope of essential tasks: By December 2012
 - Eliminate non-essential tasks: By March 2013
 - Outsource identified functions: By July 2013
 - Evaluation by DARM’s Benchmarking Specialists
 - Report findings and plan to management
- 2) Increase Efficiency
- a) Ensure a single point of contact for permitting and compliance industry issues: By July 2011
 - Determine contact and update business processes
 - Projected Savings: Expedited customer service
 - b) Provide a single point of contact to district offices to ensure consistency of air enforcement: By December 2011
 - Prepare standardized case referral forms for use by the district office staff
 - Require Deputy Director approval for cases above \$10,000.
 - Projected Savings: Consistent case resolution
 - c) Implement web-based General Permits: By July 2012
 - Modify/expand existing information system
 - Projected Savings: Expedited customer service
 - d) Division-wide Reorganization: Phase 1 – By July 2011 / Phase 2 – By December 2012
 - Eliminate Bureaus
 - Consolidate Program Areas
 - Increase employee to supervisor ratio
 - Measure by comparing with prior year.
- 3) Lower Taxes
- a) Enact a tiered permit fee structure: By July 2012

- Lower fees 25%-50% for permits issued under allowable time frames
 - Raise fees 25%-50% for permits issued under an expedited time frame.
 - Projected Savings: Cost savings to permit applicants
 - b) Reduce Title V annual fees: By July 2013
 - Target goal - have the lowest fees in the US
 - Projected Savings: Cost savings to private sector industry
 - c) Reduce tag fees: By July 2013
 - Evaluate mechanism to reduce fees: By December 2011
 - Develop target reduction: By July 2012
 - Projected Savings: Cost savings to Florida residents
- 4) Hold Government Accountable
- a) Develop and implement effective performance measurements: By July 2012
 - b) Revise performance appraisal process: Begin July 2011
 - Scores to be on a bell-curve
 - Communicate specific expectations and hold accountable
 - Address poor performance directly (improvement plans)
 - c) Provide incentives for exceptional performance: By January 2012

Possible incentives for top performers:

 - Implement small bonus system
 - Provide staff with an annual/monthly State Park pass
 - Other small incentives
 - Potential funding source could be derived by implementing a 'clean air' program, analogous to the clean marina program, for other industries and business.
 - d) Develop Division-wide Business Plan to identify goals and plans to achieve: By December 2011
 - e) Communicate and publish Business Plan on web: By December 2011

Environmental Assessment and Restoration

- 1) **Proposal: Improve Efficiency of State Monitoring Programs.**
 DEAR plans to implement several initiatives, which will more cost-effectively utilize Florida's monitoring resources. DEAR will optimize water quality monitoring resources

through close coordination with local entities, using DEP monitoring resources to accomplish multiple program goals.

a) Reinitiating the Monitoring Council

This will provide a forum for Florida monitoring entities to share information about their monitoring efforts and instill consistency in monitoring methods - facilitating data sharing. DEAR will use this as a venue to provide timely information about Quality Assurance (QA) and data management requirements, and plan to hold meetings quarterly starting in August. The majority of these meetings will occur as webinars to minimize travel costs. DEAR intends to provide participants some limited travel funds for meetings, but the Council will need to solicit funding to implement projects included within the Action Plan.

As part of the Monitoring Council, DEAR proposes to develop a web-based Monitoring Atlas that will provide clear summaries of ongoing ambient monitoring programs in the State (stations locations, parameters monitored, monitoring frequencies) and provide linkages to the available databases.

b) Develop a Guide for Volunteer Monitoring Groups

There are several volunteer monitoring groups in Florida: LakeWatch, Bream Fishermen Association, Aqualab, etc. These groups collect a significant amount of data, but its quality generally is too variable for it to be used for regulatory purposes. The monitoring Guide will provide clear guidance on DEP's key Standard Operating Procedures (SOPs), as well as the training needed to ensure the data meets our QA requirements (follow-up audits as necessary).

Resources needed: Current in-house funding is sufficient. DEAR will rely on existing staff, and distribute informational materials electronically. Resource needs for the web-based Monitoring Atlas are TBD.

Benefits/key performance metrics: It will allow district monitoring staff to be better utilized, and provide increased overall coverage for waters monitored and assessed (will allow for monitoring of more waters). Time and cost savings also may allow for more thorough data collection, resulting in better regulatory decisions. The web-based Monitoring Atlas in particular will make data more accessible to the public and help to identify the duplicate monitoring stations.

Estimated time needed: Monitoring Council will be launched in August, and district monitoring staff will be reorganized within a year. The Guide for volunteers can be developed by the end of the calendar year. Timeframe for web-based Monitoring Atlas is TBD.

Estimated time/cost savings: This will achieve cost savings for DEP, other agencies, and other monitoring entities by eliminating duplicative visitation to monitoring stations by multiple parties. DEP also will experience cost savings via a reduced demand on staff to meet the monitoring program expectations (monitoring and assessing all waterbodies).

- 2) **Proposal: Develop a Program to Empower Local Entities to Develop TMDLs and BMAPs.** DEAR wishes to empower local stakeholders with the ability to develop TMDLs and BMAPs, with DEP oversight as appropriate.

Resources needed: Current in-house resources should be sufficient.

Benefits/key performance metrics: This would avoid duplicative draw on State resources currently being used to both develop 100% of Florida's TMDLs & BMAPs and to increase the speed at which TMDLs & BMAPs are developed. Florida has more than 2,000 impaired waterbodies, but only 253 TMDLs and 8 BMAPs have been able to be adopted.

The workload demand on DEP's resources is great, and this type of program would increase the rate of progress Florida is making in restoring its impaired waterways.

Estimated time needed: This would be an ongoing project. It could be achieved within one year with the tools currently provided.

Estimated time/cost savings: Cost savings would be realized over the long term. For example, if 10% of the waterbody impairments were addressed through locally derived TMDLs and BMAPs, DEP workload would be reduced by approximately 200 TMDLs and 20 BMAPs. This would result in a maximum cost savings of \$90,000 per TMDL and \$250,000 per BMAP - total possible savings \$18 million for TMDLs and \$5 million for BMAPs.

- 3) **Proposal: Modify Water Quality Standards to Correctly Reflect Natural Conditions and Avoid Diversion of Staff Time over Environmentally Irrelevant Activities.**

- a) Attempt to Reclassify South Florida Canals.
- b) Implement Class III Limited Classification for Drainage Ditches.
- c) Change the Dissolved Oxygen Standard.
- d) Complete Nutrient Criteria Rule Making.

Resources needed: Current in-house resources should be sufficient for this proposal, with the exception of reclassifying south Florida Canals, which requires the commission of a major research project. The canals must be studied in order to determine the appropriate designated use for the canals and to identify necessary ecologic and water quality characteristics to maintain their appropriate designated use. This is particularly important with respect to the application of dissolved oxygen and nutrient water quality standards. The precise cost is TBD, but is estimated to require the addition of several million dollars to the TMDL budget.

Benefits/key performance metrics: This will enable DEP to avoid identifying false impairments, which result in litigation and unnecessary workload that do not add environmental value. DEP would experience decreased challenges to verified impairments, decreased demand for the processing of SSACs, and increased restoration activity for valuable water resources.

Estimated time needed: The south Florida canal study would take approximately three years to complete. Implementation of the Class III Limited Classification for drainage ditches could be launched within the year. It will take approximately one year to complete the dissolved oxygen and nutrient criteria rule revisions/making.

Estimated time/cost savings: Most cost savings would be realized by the regulated entities affected by the imposition of improper water quality standards. DEP would realize cost savings by avoiding the diversion of staff time away from environmentally irrelevant activities (such as litigation over false impairments), and redirecting it towards truly necessary assessment and restoration activities.

Waste Management

Division's Mission

In part reads: "To implement state and federal laws to protect and restore the environment from the improper handling and disposal of solid and hazardous wastes."

A snapshot of the Division

The Division works with District Offices to implement state and federal laws to protect the environment from improper handling and disposal of solid and hazardous wastes. Oversees regulatory programs for waste facilities pollutant storage systems, and non-regulatory activities such as financial and technical assistance with waste recycling and reduction. The Division oversees and contracts for the cleanup of sites contaminated with petroleum products, dry-cleaning solvents, or other hazardous wastes.

FY11-12 budget of nearly \$195M includes an operating budget of \$55.7M with over \$18M supporting counties, state agencies, and other entities (such as UF, FSU) providing services. Fixed Capital Outlay budget is \$139.4M with most of it going to private remediation contractors for cleanup of contaminated sites.

FTEs: 233 (Legislature eliminated 4 vacant positions). Will go on another position-elimination exercise in 30 days. Attrition will likely eliminate another 6 positions.

OPS: 29 (all in the electronic processing center)

Budget: Planning for budget cuts in the 5 to 20% range as this has not been determined by EOG.

Strengths

- Leader in metrics and performance measurement.
- Very electronically/database-oriented Division. We have a database and metric for just about anything.
- 100% personnel is Trust funded. No General Revenue-funded personnel.

- Technical staff is made up of seasoned engineers, geologists, and scientists.
- Has developed SWIFT/FIRST and moving to digitize every process.
- Despite some policy differences, generally a good working relationship with the U.S. EPA Region 4.
- Observed culture is to DO/ACHIEVE cleanups or a tangible outcome: restoration of affected media.

Uniqueness

The Division, even with trust fund raids, is a net jobs generator throughout the State by virtue of injecting approximately \$160M each year into the State's economy. These funds come from the Inland Petroleum Trust Fund (IPTF), the Dry Cleaner Trust Fund, and several other federal grants. A whole service industry has been built around this capital outlay: well drilling firms, laboratories, engineering consulting firms, surveyors, and others services. Thousands of fellow Floridians are employed as result of these two programs. According to industry, the multiplier effect of this yearly capital injection is easily three times the FCO outlay.

Strategic Proposals for Consideration

Achieve Fiscal Finality of the Inland Petroleum Trust Fund

One can still apply for some of the IPTF programs in one way or another. I highly recommend ending the application period for all IPTF programs by the 2013 session for the following reasons:

To provide fiscal finality- the State can better evaluate its long-term financial liability for these cleanups.

To encourage resolution and reporting, much like the Early Detection Incentive program, requiring owners to evaluate their need for state funding and make an application by the end of 2015 (arbitrary date on my part).

For some programs, eligibility is contingent, in part, upon the applicant's insurance. However, if no claim is filled when the discharge occurred, the applicant likely DOES NOT have insurance which is contrary to the statutory intent of the program. And we have to pick up the cleanup tab.

- *Task:* Look at the Statute and state the program's sunset in each and every program.
- *Benefits:* Provide a measure of future financial liabilities to our State.
- *Challenges:* Requires reaching out to petroleum industry. Everybody buys in to the new vision that IPTF needs finality.
- *Progress:* Proposal stage.
- *Schedule:* Proposal stage.
- *Cost Savings:* Unquantifiable but in the tens of millions of present worth since right now we don't know when these programs will end.

Even if we reach sunset-ing of the IPTF, work will exist for another 15 years. But we need finality.

Achieve Department-wide Permit Consistency for Solid Waste Class I Landfills

- *Task:* Reduce inconsistency by having the Division of Waste Management provide oversight on permit application reviews. The Division will have oversight authority and veto power over any District recommendations for RAIs and draft permit documents. Division Director ultimately responsible for assuring statewide consistency.
- *Benefits:* Improve consistency and reduce complaints that District staff sometimes exceeds rule authority. Reduce RAIs to no more than two. Lower permit costs. One-venue for applicants to voice concerns. Clear message to industry: *"we have heard you."*
- *Challenges:* Requires cultural change to implement and accept new permit templates. Everybody buys in to the new vision. DWM staff realignments travel, training.
- *Progress:* Department-wide templates under development. Oversight needs to be mandated by Deputy Secretary to DOs and not accomplished yet.
- *Schedule:* Templates out in 60-days. Oversight TBD at leadership meeting.
- *Cost Savings:* Less RAIs= less \$; Less time to obtain permit. Landfill operation/expansion can proceed without much delay.

Every Departmental Form, Permit, or Tax Credit Application should be available in electronic format

- *Task:* Eliminate loads of paperwork and errors.
- *Benefits:* Improved feedback to applicant about status of applications.
- *Challenges:* Requires OTIS involvement and prioritization of tasks. Not everything is priority number one.
- *Progress:* DWM has begun this proposal. Department-wide approach requires coordination with OTIS.
- *Schedule:* DWM has until Fall 2011 to incorporate remaining permits, forms, etc., into Department's business portal.
- *Cost Savings:* For the Department: reduced man-hours in transferring every paper form to Oculus. For regulated parties: unquantifiable but savings in administrative costs by not sending extensive paperwork.

Administrative Staff utilization (potential to use Department-wide)

- *Task:* Consolidate stove-piped administrative support staff into bureau-level "pools".
- *Benefits:* Evenly distribute workload peaks; reallocate time to unfulfilled needs such as inserting document backlog into Oculus or Department-wide needs. Just like the private sector, allocate administrative resources where the need is greatest. Start Division-wide but then look Department-wide.
- *Challenges:* Cannot formally restructure due to budget impact (SES status for supervisor). Proceed at a smaller scale.
- *Progress:* Analysis of current workload, training requirements and unfulfilled needs is underway
- *Schedule:* Will be operationally effective by September 1 in DWM

Where applicable, leverage the expertise of the public sector to achieve Department's core mission: to provide stewardship of our natural resources.

- *Task:* Where applicable, leverage industry expertise in achieving performance metrics. Employ performance based contracts (PBC) for IT services, site cleanups, and other services.
- *Benefits:* More effective and efficient method of reaching cleanup goals, standards and criteria. Need to look at other programs Department-wide.
- *Challenges:* DWM is doing it but cultural change needs to happen; industry is not the enemy. Need to do a program-by-program evaluation across all Divisions.
- *Progress:* DWM has begun expanding its PBC program. Will work with industry to achieve site cleanup performance metrics.
- *Schedule:* Will be operationally effective by October 1.

Look at space rental costs

- *Issue:* DWM pays DMS \$1.2Million/year for rental of two floors and the document digitalization center. Discuss with DMS rates when lease comes up for renewal.
- *Task:* Attempt to reduce space rental cost from overall budget. Negotiate lower rental costs with DMS -or look for space elsewhere.
- *Benefits:* Potential to achieve substantial savings.
- *Challenges:* Requires a bottoms-up review of space needs.
- *Progress:* Proposal stage.
- *Schedule:* Not assigned.
- *Cost Savings:* Potentially substantial.

Division of Water Resource Management

Strategy (i.e. "Big Idea")	Resources and Key Activities	Objective Metric:		Strategy Timeframe	Estimated Savings
		Improve Efficiency/ Regulatory Streamlining	Reduce Cost		
<p>Create "Certified Good Steward" Program where there is an incentive to permittees/owners to maintain compliance. Incentives could include:</p> <ul style="list-style-type: none"> • Longer Permit Duration • Reduced fees • "General" permits for repeat customers (i.e. Batch plants, UST's) • Reduced documentation for permit/renewal applications • Reduced inspections 	<p>Staff to develop and implement program; Statute changes; rule changes</p>	<ul style="list-style-type: none"> • # Certifications • # Extended Duration Permits • # General Permits 	<ul style="list-style-type: none"> • Permit Fees • Cost to Renew Permits for applicants • Inspection Costs for applicants 	<p>18 to 24 Months</p>	<ul style="list-style-type: none"> • DEP staff time to process permits • DEP resources to perform inspections
<p>Create a Compliance Assistance Program to help shift the focus from permitting, although still required, to good compliance. The goal here would be to streamline permitting and culturally shifting away from developing permit rules and conditions to address the worst offenders (regardless of what the rules and permit say) and focusing more on compliance and enforcement.</p> <ul style="list-style-type: none"> • Less cumbersome permitting process (Redesign of most permitting processes using Lean methodologies) • Less resources assigned to permitting, more to C&E • Reduced costs to those who comply 	<p>Department wide staff; Statute Changes; Rule Changes; Policy Changes</p>	<ul style="list-style-type: none"> • # Programs where implemented • Permit TIH • # Permittees Not in Compliance 	<ul style="list-style-type: none"> • Staff time to review permits • Resource Allocation 	<p>3 to 5 years</p>	
<p>Incentivize electronic submission of DMR's and other such monitoring information, and require it</p>	<p>DWRM & DWM; Statute and Rule</p>	<ul style="list-style-type: none"> • % eDMR's • Time from 	<ul style="list-style-type: none"> • Cost of Staff to 	<p>18 to 24 Months</p>	

<p>for facilities that meet certain size thresholds:</p> <ul style="list-style-type: none"> • Quicker acknowledgment of compliance/non-compliance • Less staff time to process • Reduce paper 	Changes; ongoing maintenance of eDMR databases	<p>submittal to compliance issue notification</p> <ul style="list-style-type: none"> • # on EPA Watch List 	<p>enter/Scan DMR Data</p> <ul style="list-style-type: none"> • Cost of Staff to scan DMR's for compliance issues 		
<p>Centralize review and approval of Financial Assurance Documents</p> <ul style="list-style-type: none"> • Create acceptable Templates • Consistency throughout Department • Reduced time preparing and reviewing 	Department Staff	<ul style="list-style-type: none"> • Time to approve • TIH • Reduce # deficient FA mechanisms 	# of Staff dedicated to review and approve	6 to 12 months	
<p>Merge Mine Reclamation and Mine ERP's into a single process/permit.</p> <ul style="list-style-type: none"> • Eliminate redundant submittals • Reduce permitting and staff review time • Reduce time/space needed to handle and store duplicative information 	DWRM Staff; Rule Changes; District Staff	<ul style="list-style-type: none"> • # Combined Apps • TIH • Industry Feedback 	Staff and Resources dedicated to permit review	18 to 24 Months	
<p>Streamline Division/Bureaus by combining activities with similar activities in other Divisions/Bureaus:</p> <ul style="list-style-type: none"> • Contract Administration • Aerial Photo Acquisition/Management • IT Functions • Land Management 	DWRM Staff				
Transfer Operator Certification Program to Private Sector	DWRM ; Statute and Rule Changes;				
Require electronic submission of NPDES stormwater NOIs and other General Permit NOIs:	OTIS; DWRM & DWM; Statute and Rule Changes;	<ul style="list-style-type: none"> • # and % iNOIs 	<ul style="list-style-type: none"> • Cost of Staff to enter/Scan 	18 to 24 Months	

<ul style="list-style-type: none"> • Quicker acknowledgment of application approval • Less staff time to process • Reduce paper 			NOIs <ul style="list-style-type: none"> • Cost of Staff to scan iNOIs 		
Provide tools for the implementation of Continuous Improvement (Lean) projects, and training of Continuous Improvement concepts to drive a Continuous Improvement culture throughout the Regulatory Districts and Divisions to increase efficiency, consistency, teamwork, accountability and customer satisfaction.	Organizational changes; Training	<ul style="list-style-type: none"> • Priority processes streamlined • Standardized work agency-wide • Effective problem-solving staff members 	<ul style="list-style-type: none"> • 80% of process wastes eliminated from a typical event 	Ongoing (It's called Continuous Improvement)	Lean projects completed at DEP have proven to be of monetary value

From: Gaskin, Carla A.
Sent: Monday, August 22, 2011 11:04 AM
To: Maher, Jim
Cc: Strong, Greg; Iglehart, Jon
Subject: RE: Strategic Planning

Thanks Jim, but I don't know if this is what I am looking to put on the spreadsheet. This is definitely a component of the outreach business plan, but for the spreadsheet I am looking for high level thoughts on what yall are planning to accomplish. Below is the language provided by the South District for the spreadsheet, which I think is sufficient for us to define a scope and start working on a plan. Thoughts?

Project	Description including (Importance)	Problem statement/ (Present Performance)	Resources and Actions Needed/ (Difficulty)	Benefits Including Metrics (Impact)	External Estimated Savings/Financial Impact	Internal Estimated Savings/Financial Impact	Targeted Time/Projected Start and Finish Dates	Review Lead(s)
Outreach: Foster a culture of customer service and regulatory certainty. Sustainable and efficient pro-business climate with environmental stewardship through outreach, education and other development support.	Redefining org. value of excellent customer service; Encouraging sustained development/business climate; targeting businesses - relocating, expanding and start-ups. Multi-level approach: seeking stakeholder input; focus on performance-based outcomes; engaging stakeholders in key processes.	Current customer service reactionary and does not serve business/regulated community needs or potential opportunities adequately. (i.e. relationships with Enterprise Florida, networks to build relationships with US and foreign companies, especially in South Florida.)	Defined scope; stakeholder needs ID; LEAN process mapping; Relationship building; Database support; Website development; Agency cultural shift in terms of work evaluation.	Customer-friendly, consistent and efficient agency; Increased business, development and entrepreneurial opportunities (i.e. # of new start-ups); Reduced environmental degradation events; Partnering relationship with regulated community (i.e. # of reduced regulatory impediments) quicker job creation opportunities.	Reduction/elimination of cleanup costs; Cost savings through revised processes; Regional economic benefits/impacts; Reduction in start-up costs/time.	Reduced compliance enforcement process and litigation expenses; increase operational and programmatic efficiencies.	From now until	Jon Iglehart/ Greg Strong

From: Maher, Jim
Sent: Thursday, August 18, 2011 4:39 PM
To: Gaskin, Carla A.
Cc: Strong, Greg; Iglehart, Jon
Subject: FW: Strategic Planning

Hi Carla,
 Greg asked me to forward this response to your recent request. Let me know if you have any questions or if supplement is desired. Thanks.
 Jim

James R Maher, PE
 Administrator
 Submerged Lands/Environmental Resource Program
 Florida Department of Environmental Protection
 7825 Baymeadows Way Suite B200
 Jacksonville, FL 32256
 904-256-1650 ofc
 904-509-5389 cell

Project	Description including (Importance)	Problem statement/ (Present Performance)	Resources and Actions Needed/ (Difficulty)	Benefits Including Metrics (Impact)	External Estimated Savings/Financial Impact	Internal Estimated Savings/Financial Impact	Targeted Time/Projected Start and Finish Dates	Review Lead(s)
Outreach to Real Estate Professionals	<p>Providing sufficient information to homeowners to avoid dock or wetland violations through their realtors.</p> <p>Realtors will need to know this empowering information will protect their clients and ultimately lead to greater value.</p>	<p>Need to improve customer service; Add value for customers</p> <p>Consumers are potentially unknowingly purchasing or constructing non-compliant dock structures and or wetland violations without full know-ledge. Title insurance does not cover structures over sovereignty submerged lands. Costly dock and fill removal has resulted as well as penalties</p> <p>Need to provide no cost quality training option to regulated operators that includes a solid understanding of regulatory requirements and compliance needs to augment plant technical skills. Costly enforcement has occurred due to this understanding gap.</p>	<p>Educational presentation outreach to The Northeast Florida Association of Realtors (NEFAR) which includes more than 5,300 Realtors and business partner members in Duval, Clay, Putnam and St. Johns counties. Provide 4 quarterly workshops and written targeted literature information on how to determine whether wetlands are present and what the law allows regarding dock pre-emption.</p>	<p>Reduced regulatory impediments; reduced regulatory burden to customers</p> <p>Reducing costs and incidence of corrective actions when unknowing structures and fill that violate Statutes must be removed, as well as avoiding enforcement costs.</p>	\$72,000	\$40,000	4/1/2012 through 3/31/2013	Jon Iglehart/ Greg Strong
Outreach Training for Wastewater Operators	Operators are required by statute to have certification including continuing education. Insufficient training results in plant upsets and non-compliance. However costs of training are born by the regulated operators and utilities (and rate payers)		Conduct 12 monthly outreach training days with classroom and plant tour components strategically located across the District. Also conduct 4 quarterly training addressing minor non-compliance issues frequently encountered.	Costs of training for required CEUs removed as burden to operators. Potential enforcement cases averted reducing penalties to operators, utilities and rate payers and saving the Department enforcement cost; improved communications to optimize operations and compliance.,	\$20,000 savings per year for Operators CEUs + \$125000 in penalties for facility's avoidable SNCs Total \$145,000.00	\$25,000.00 for enforcement costs		

Cost bases:

Real Estate Professionals:

Of 64 enforcement cases in fiscal 2010-11, it could broadly be asserted that 32 could have been prevented with a more comprehensive due diligence investigation by the buyer. A description of DEP jurisdiction in wetlands and the Forms of Consent required for private structures over sovereignty submerged lands provided to the buyer and the seller before the real estate closing, may prevent a violation from occurring or it may incentivize the seller to provide necessary corrective action voluntarily, with minimal Department intervention. Between workshops and literature outreach to the realtors, as well as word of mouth among colleagues perhaps 50% of those unknowing homeowners could have been reached [preventing perhaps 16 of those formal violations, and probably scores of fill removal actions that resulted in compliance without enforcement. An average fill removal cost is estimated at \$2500, and typically penalty is \$2000. One recent dock removal cost \$25,000, but I don't have account for how often that has occurred. $16 \times 4500 = 72,000$. DEP spends an estimated \$2500.00 on those cases $\times 16 = 40,000$.

Wastewater Operators:

External estimated savings/financial impact

The cost for the operator training to maintain wastewater license at the TREEO center is \$200 to \$275.

Number of wastewater operators trained in the outreach program is 250.
CEU's received 0.4
Savings to operators and employers is $(250 \times 0.4 \times 200) = \$ 20,000$
25 SNC facilities x \$5000 = \$125,000 in penalties

Internal estimated Savings/financial impact

Wastewater Significant out of Compliance (SNC) rates decreased from 15% to 5%.
 $0.15 \times 250 = 37$ facilities
 $0.05 \times 250 = 12$ facilities
A changes of 25 facilities.
Enforcement savings 25 facilities x 40 man hrs x \$ 25/hr = **\$25,000**

Intangible benefits:

Increase overall protection of the environment.
Develop a proactive approach to problem solving by engaging the stakeholders.
Improve communication between DEP and regulated community.

From: Strong, Greg
Sent: Tuesday, August 16, 2011 11:06 AM
To: Maher, Jim
Subject: Re: Strategic Planning

I like your suggestion, Jim. Not sure whether the contractor workshop series, or our engagement with realtors tells a better story. Your call.

It might be helpful to chat with Jon about this as well.

Keep me posted.

Thanks,

Greg

From: Maher, Jim
To: Strong, Greg
Sent: Tue Aug 16 10:45:10 2011
Subject: Re: Strategic Planning

As the line item is broad, outreach, how to attach dollar savings both internally and externally would require some narrowing of what we are specifically evaluating. How about I base a draft response on two specific examples of outreach, operator training and either contractor workshops or realtor engagement. We should be able to swag dollars to those. I would of course update the other columns to identify the specific proposals. Or do you favor a different approach?

Sent from my BlackBerry Wireless Handheld

From: Strong, Greg
To: Maher, Jim
Cc: Ford, Victoria
Sent: Tue Aug 16 10:16:15 2011
Subject: Fw: Strategic Planning

Jim,

Please review this and see if you can put together a preliminary response. Today is a heavy travel day for us, but I'll try to look at your draft later.

Thanks,

Greg

From: Gaskin, Carla A.
To: Iglehart, Jon; Strong, Greg
Sent: Tue Aug 16 10:04:51 2011
Subject: Strategic Planning
Jon/Greg:

I am trying to update the master tracking spreadsheet that was developed as a result of the strategic planning session. The item below has been identified as "Projects Needing Further Review and Analysis" and was tasked to you two. Can you please review the information that is already there (and edit as you see fit) and fill in the two yellow columns? Once you send back to me, I will update the master tracking list.

The attached Word document might answer questions you may have.....

Project	Description including (Importance)	Problem statement/ (Present Performance)	Resources and Actions Needed/ (Difficulty)	Benefits Including Metrics (Impact)	External Estimated Savings/Financial Impact	Internal Estimated Savings/Financial Impact	Targeted Time/Projected Start and Finish Dates	Review Lead(s)
Outreach	Multi-level approach: Seeking stakeholder input; Focus on performance-based outcomes; Engaging stakeholders in key processes ; Addresses a key org. value of excellent customer service	Need to improve customer service; Add value for customers	Need for more defined scope; Seek stakeholder input/possible survey; Process mapping and analysis	Reduced regulatory impediments; reduced regulatory burden to customers				Jon Iglehart/ Greg Strong

If you have any questions, please let me know.