CT DEEP: LEAN Permitting Process Improvements

December 18, 2012
Nicole M. Lugli, Office Director
Office of Planning and Program Development
Webinar, *Environmental Protection with Less Process in Permitting*
LEAN Progress at CTDEEP

- To date, 49 teams have participated in Kaizen events
- More than 400 staff participants
- Wide range of projects including permitting and enforcement of air, waste, and water pollution control and land use programs; wildlife, fisheries, boating; and energy management
- Working with DOT, DECD and OPM on interagency processes
LEAN as a Growth Strategy

- Internal operations are more efficient
- Staff is more engaged and has developed greater capacity
- DEEP has an increased ability to address new challenges
- Customer experience: improved timeliness, accessibility, transparency, predictability

A Streamlined Future State of the OLISP Structures, Dredging and Fill Permit Application Process, which reduced permit review time by 70%.
What is the Impact on Our Customers?

- **Businesses**
  Wastewater discharge permitting program (NPDES) – reduce time to process permit by 77%

- **Homeowners**
  Office of Long Island Sound Programs (OLISP) Permitting - reduced permit review time by 70%

- **Municipalities**
  Clean Water Fund – payment processing reduced by more than 170 days

Lean Team identified strategies to streamline and simplify environmental land use restriction application and approval process.
Examples of Common Permitting Process Wastes

The following are several common permitting process wastes identified:

- Incomplete applications
- Backlogs
- Approval bottlenecks
- Redundant review or data entry
- Lack of templates - need for development of Standard Operating Procedures (SOPs)
Measuring Results is Essential Component for Success: Key Performance Indicators (KPIs)

- A way to measure progress
  - Know whether efforts are achieving goals
  - Be aware of whether adjustments are needed (Plan/Do/Check/Act)
- Sample Common Key Performance Indicators:
  - % of applications deemed “complete” on 1st submittal
  - # days to determine administrative completeness

The Solid Waste Enforcement Team’s KPIs, which includes percent of formal actions drafted and average number of days it takes to draft a formal action.
# Making Government Work: LEAN is a Key Enabler for Our Transformation Efforts

<table>
<thead>
<tr>
<th>Transformation goals</th>
<th>Next steps</th>
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<tbody>
<tr>
<td>Faster</td>
<td>• Investing in information technology solutions to achieve efficiencies</td>
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<td>More effective</td>
<td>• Identify statutory and regulatory obstacles to change</td>
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<td>More efficient</td>
<td>• Pursue a balance of “command and control” focus and market based approaches</td>
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<td>More responsive</td>
<td>• Developing core metrics with measurable environmental and programmatic improvements</td>
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<td>More predictable</td>
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<td>More transparent</td>
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| 1 | Strategic Process Rethink  
(e.g., rules, regs. and key processes, permitting, enforcement) |
| 2 | Alignment of Energy/Environment/Economy  
(e.g., capacity building, IT, organization design) |
| 3 | Information Systems  
(e.g., IBM plan, Advanced Case Management) |
| 4 | LEAN  
(e.g., impact tracking, PURA, interagency) |
| 5 | Metrics  
(e.g., operational, institutional, public) |
| 6 | Bureau Transformation  
(e.g., processes, metrics, reg. redesign) |
| 7 | Communications  
(e.g., agency “branding,” intranet site) |
| 8 | Professional Development  
(e.g., lateral and upward movement, mgmt training) |
## Tiered Permit Structure - Standardization of Bins

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<th>Time Frame</th>
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These are permitting bins identified from Agency-wide Permit Workgroup meetings.
Moderate – Standardization of bins - AIR

0 to 1 Day
- Permit by Rules
- Emergency engines
- Rockcrushers
- Boilers
- Autobody
- Surface coating
- Distributed Gen.
- Combined Heat & Power
- Solvent degreasing

<15 days
- GPLPE
- Transfers

<45 days
- GPLPE
- Transfers
- NSR Revisions
- Title V Revision

<60 days
- Transfers
- NSR Revisions
- Title V Revision

<90 days
- NSR Revisions
- Title V Revision

<120 days
- Title V Mods
- New NSR
- NSR Mods
- Title V Revision

<180 days
- Title V Mods
- New Title V
- Title V Renewal

> 180 days

- Implementation of New LEAN procedures - learning curve
- New Permit by Rule for CHPs and solvent degreasing
- External Workshops on new forms
### Aggressive – Standardization of Bins - AIR

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- E-government submissions
- Smart Forms
- Paperless workflow
- ICM
- Additional tools
Industrial Storm Water
General Permit
E-file LEAN Project
The “Opportunity”

- Industrial Storm Water General Permit
  - Wide range of pollutants potentially affecting water quality
  - Large regulated universe (1500+ permits)
  - Many small business w/ no environmental expertise

- Process cumbersome
  - Time consumed by physical movement of paper
  - Limited staff resources to thoroughly review registrations

- Changes in the Law compounded the problem. DEEP must now:
  - Provide public participation process
  - Provide additional compliance assistance
LEAN Project

- Lean project goals (program & IT staff)
  - Develop an electronic registration process
  - Include logic in e-registration to improve adequacy of information submitted
  - Eliminate waste and/or non-value added steps
  - Incorporate new permit requirements in process
The “Now”

- LEAN team met weekly for 6 months to create e-forms in-house
- Successfully deployed e-forms in April, 2011
- Scan Applications into SIMS (fee & wet ink signature limitations)
- Streamlined and more efficient workflow by paperless processing
- Online status of registrations to allow 24/7 public access and participation
- Steps eliminated: no more lost time due to physical transport of paper, no more printing registration certificates, no more incomplete applications
The “Future”

- Full online registration w/ electronic submission of fees and with a verified signature

- Benefits:
  - more environmental protection,
  - more efficient,
  - more effective,
  - more transparent

- Model for agency-wide electronic permit processing
Evaluation of DEEP’s Coastal Management Certificate Of Permission (COP) Process
COP Current State and History

- COP process started in 1990
- Applications are processed in 45 days, with the ability to extend to 90 days if the application is insufficient.
- If no decision by 90 days, application is auto-approved
- Pre-application process can take from 1 day to 3 years!
- Over 50% of COP applications are extended beyond the initial 45-day period
- Average time from application receipt to decision = 53 days
- Approximately 70% of staff time spent on COP processing
- Applicants push for more activities to be considered eligible for the COP process
Waste Identified!

• Extensive inefficiencies in pre-application process

• Similar situations handled inconsistently

• Lack of consistency in interpreting eligibility criteria
Proposed Future State

- Implement a robust pre-application process which will result in more complete application submissions
- Review categories of COP-eligible projects and move certain categories to general permit as appropriate (“binning”)
- Clarify and quantify eligibility criteria and definitions
- More clearly define continuously maintained and serviceable and minor alterations across multiple eligibility categories
- Improved delegation of signature requirements
90% application processed within 26 calendar days

Percent Applications Processed within 26 days

- Applications Processed
- Goal
Key Performance Indicators

Reduction of staff time spent on COPs from 70% to 20%

Staff Time Spent on Processing COPs

- **% staff time**
- **Goal**

Connecticut Department of Energy and Environmental Protection
Lessons Learned about Successful Implementation of LEAN recommendations

• Critical to the process is having management support in accepting recommendations for change and being fully engaged in implementation.

• Important to keep all Division staff informed as to the project goals and implementation activities.

• As the project implementation moves forward, need to be mindful of continuing to include others within the programs to integrate efforts.
More Information

- DEEP’s LEAN Initiative

- Permit and Environmental Compliance Assistance

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