Promote an Integrated, Balanced Approach to Compliance Assurance

Maximize protection of the environment and public health and safety by

– using permit, compliance assistance and enforcement tools and resources in an integrated, balanced manner

– solving environmental problems identified as priorities
LQG New Notifier Outreach Initiative

RCRA Program Innovation

• Analysis of New LQG Notifier Data
  (5 Year Review - 2007 through 2012)
  – Approximately 6 New LQGs Per Year
  – ~50% of the new LQGs were inspected within this period
  – ~70% of the inspected sites had violations

• Develop SOPs and Outreach Materials
  – Access to RCRA Compliance Assistance Hotline
  – On-line Hazardous Waste Management Training
  – Hazardous Waste Advisory Committee

• Initiated the Outreach in FFY 2013
LQG New Notifier Results

Goals

• Increase Compliance Rate
  – Maximum Effect with Minimum Effort
  – 40% increase in compliance to 70%
  – For 30% in noncompliance - violations identified were minor with resolution through a Notice of Violation

Developing Relationships
  – 20 NEW LQG Contacts established

• Identify/Highlight Facility Specific Issues
Hazardous Waste Management Online Training Course

- Launched in 2011, viewed by over 6,992 people – 24/7 training
- **Survey results**: 95% noted course effectively reinforced understanding of Haz. Waste regs and was relevant to job; 80% enjoyed taking course on-line
- Over 380 certificates have been issued
- 1,097 students have actively participated in the course - Some students are taking the course a 2nd and 3rd time to address their training requirement
- There have been over 240 students from 50 countries
- Cost – **FREE** - RCRA on-line training costs range from $300 to $569
Providing Electronic Training Opportunities for Business and Municipalities

• **RICE NESHAP & Area Source Boiler Rule** training modules - provide regulated community with easy method to determine whether RICE or boiler subject to the rule and for obtaining comprehensive source-specific requirements

• RICE - published April, 2015, over 1,100 views; Area Source Boiler – published June, 2014, over 600 views

• **Open Burning** online certification course for municipalities

• **MS4** – Developing maps delineating reg. jurisdiction and online courses and tools/templates to support communities

• Close to launch on online course for **Aquifer Protection** program & redesigning **Inland Wetlands** online course
Streamlining the UST Inspection and Enforcement Processes through Technology & LEAN
<table>
<thead>
<tr>
<th></th>
<th>Old Process</th>
<th>New Process</th>
</tr>
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<tbody>
<tr>
<td>Pre-Inspection</td>
<td>19 Steps</td>
<td>3 Steps</td>
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<tr>
<td>Inspection</td>
<td>34 Steps</td>
<td>35 Steps</td>
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<tr>
<td>Post-Inspection</td>
<td>65 Steps</td>
<td>9 Steps</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>118 Steps</strong></td>
<td><strong>47 Steps</strong></td>
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UST Inspection Streamlining

• Eliminate need to be in the office
• Mobile office technology
• No need to look up paper files
• Complete checklist, narrative report, collect signatures, issue report, NOV, red tag on the spot in the field
RESULTS

Effect of LEAN & Mobile Technology on UST Inspection Outputs

- Pre-Lean / Technology: 7 Permanent Staff & 6 Seasonals, ~50% only partial inspections
- Post-Lean / Technology (1yr): 5 Permanent Staff inspections, 2 Perm staff moved to supplement other program activities such as enforcement, outreach, compliance assistance
- Post-Lean / Technology (3yrs):
Effect of LEAN & Mobile Technology on UST Notices of Violation Issued Annually

Pre-LEAN / Technology: 14
Post-LEAN / Technology (3 yrs out): 425

Connecticut Department of Energy and Environmental Protection
Compliance Rates

- Pre-LEAN / Technology: 58%
- Post-LEAN / Technology (2yrs out): 78%

Connecticut Department of Energy and Environmental Protection
Transferability of Technology - continued

• **Two Components:** on-line inspection checklist & mobile office technology

• All programs with field presence can benefit greatly by the mobile office technology:
  – Inspections can be entered and uploaded for review
  – Photos and documents can be attached
  – Copies of photos can be provided
  – Signatures obtained
  – Maximize number of inspections/minimize office time
Regulatory Tools that Provide Faster, Effective Alternatives to Individual Permits

- **General Permits**
  - Qualified Professional Certification - In lieu of DEEP review - Pretreatment for Metal Finishers, Miscellaneous Discharges (consolidated 9 GP categories), Construction Stormwater saves applicants up to **120 days**

- **Permit by Rule**
  - Combined Heat and Power (coming soon) saves applicants up to **1 year**

- **Notification**
  - State Inland Wetland, Water Diversion or Stream Channel Encroachment Line Permits if prior authorization with Army Corps (2012) saves applicants up to **192 days**
Questions?

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