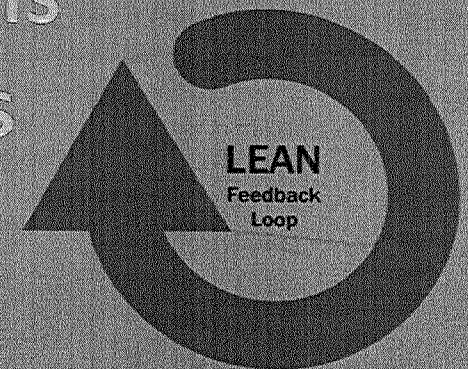
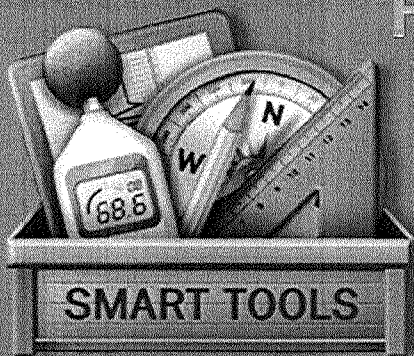
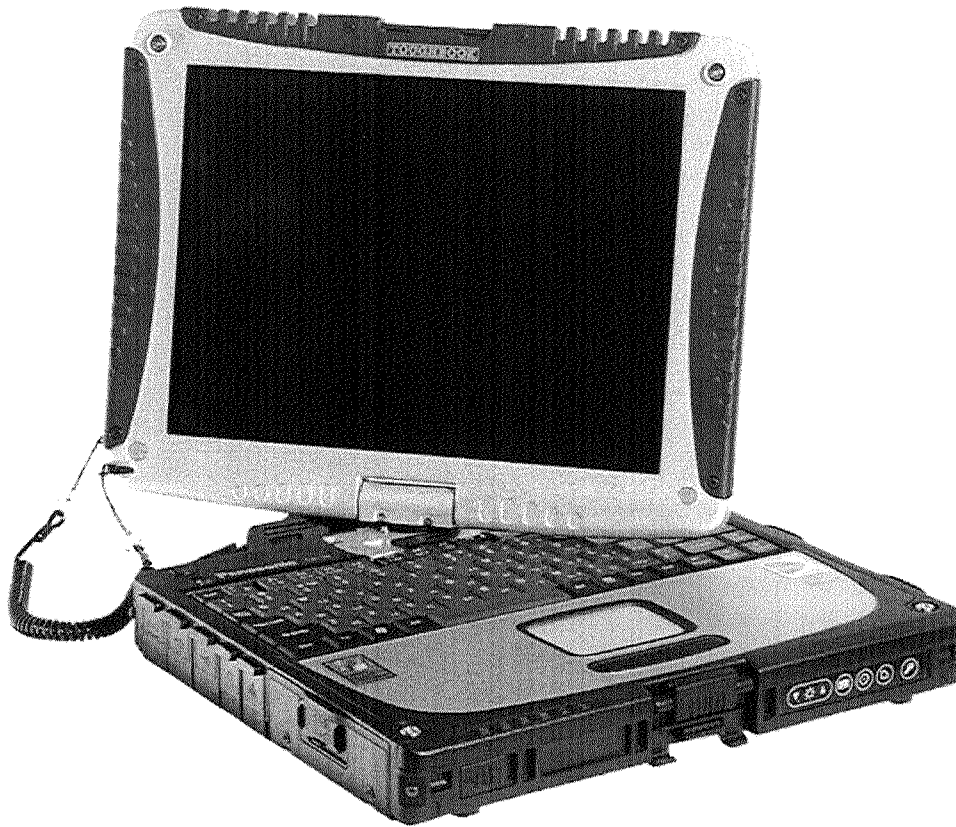


Arkansas Department of Environmental Quality

Regulated Waste Programs Office of Land Resources 2016



Smart Mobile Tools for Field Inspectors (Smart Tools)



* SOURCE IS RCRAINFO

SMART TOOLS

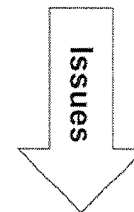
LEAN event held in
Washington D.C Oct. 5-9,
2015.

RCRA Subtitle C with
plans to expand to Air,
Water, and RST.

10 EPA Regions/NEIC and
9 States represented
(ASTSWMO and ECOS).

Event Objectives

- Consensus on Scope
- Alignment on Goals and CTQs
- Mutual understanding of the process
- Agreement on the issues and requirements
- Designed improvements, metrics, and instrumentation
- Implement simple improvements
- Documented implementation plan



Analysis

Core Inspection Process
Requirements

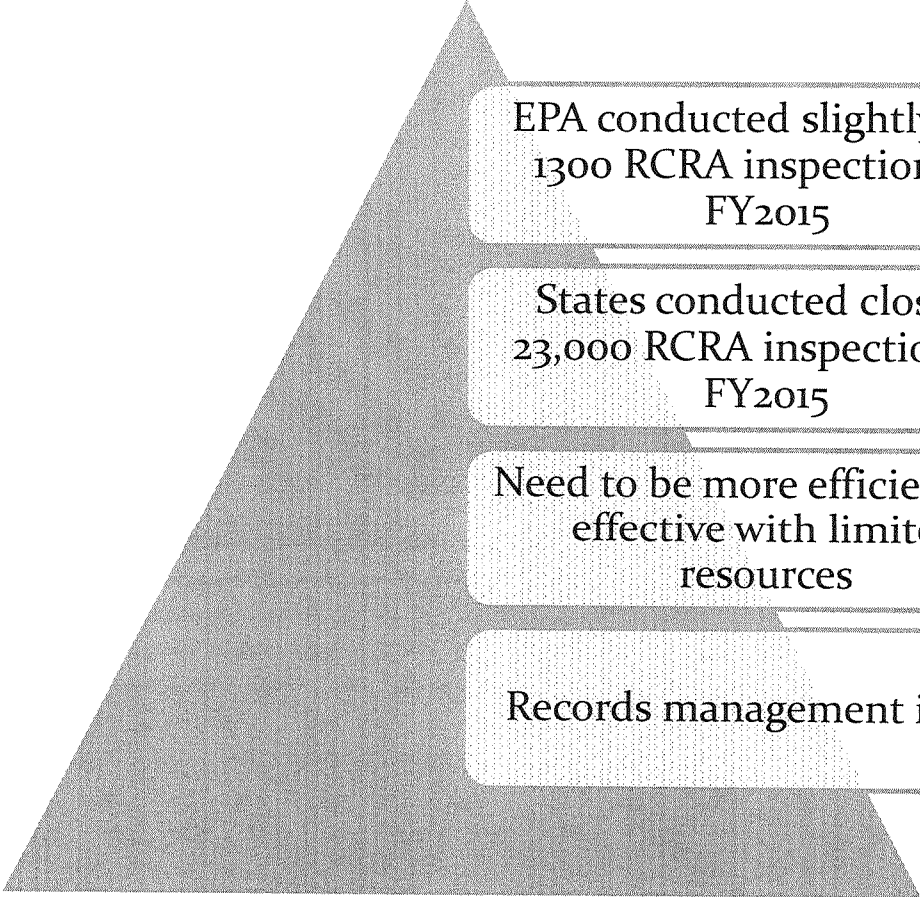


What are Smart Tools?

- Fundamentally changing the way environmental inspection programs are operated and managed, Smart Tools supports the following processes by providing an integrated suite of digital tools to improve the quality and consistency of inspections:
 - Inspection planning and management
 - Field collection
 - Evidence management
 - Data management
- Streamlines communication with facilities by providing quicker access to inspection reports & non-compliance issues.



Why Is This Important?



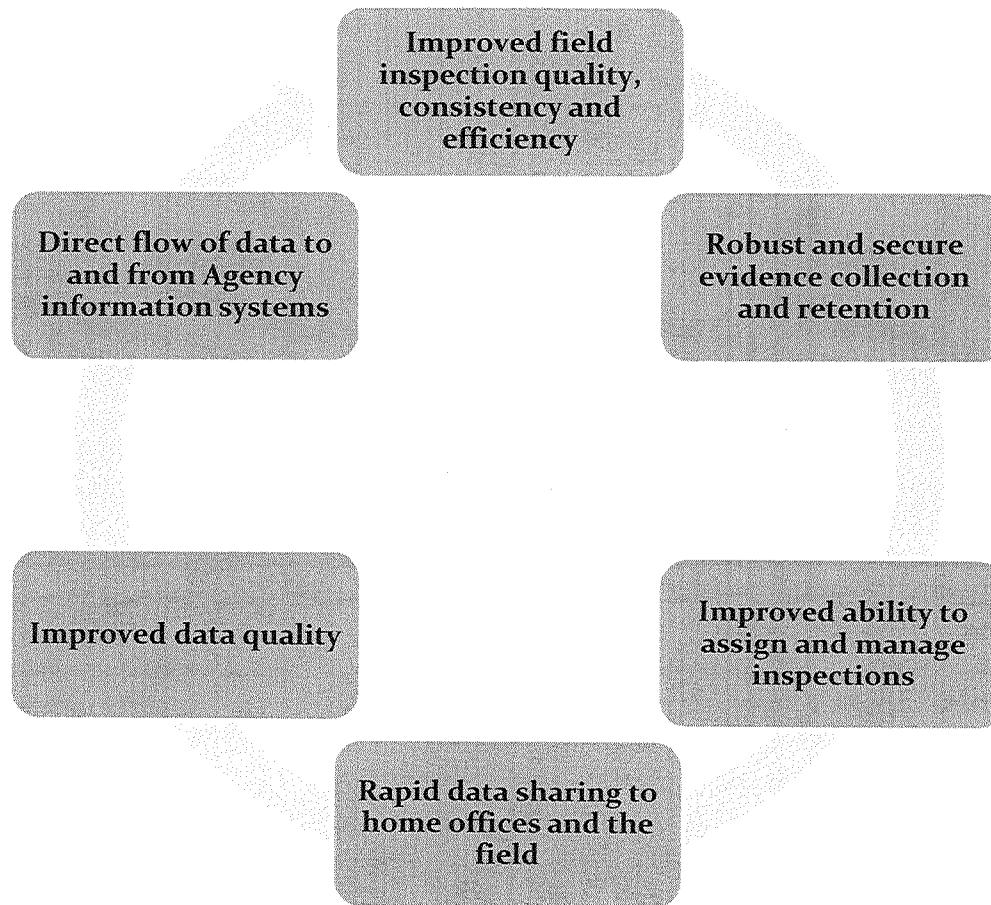
EPA conducted slightly over
1300 RCRA inspections in
FY2015

States conducted close to
23,000 RCRA inspections in
FY2015

Need to be more efficient and
effective with limited
resources

Records management issues

Expected Benefits



Phased Approach

Phase 1 (CY 2016) – Initial small EPA & State pilot of inspection component of RCRA Subtitle C inspectors

- Add management, report writing and document repository components
- Support for state modifications

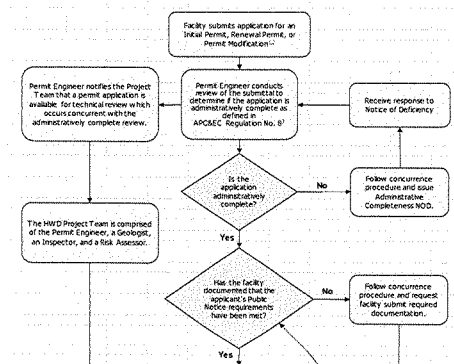
Phase 3 (2017-18) Expand to additional EPA & State inspection programs

Phase 2 (2016-2017) Releases for CWA/NPDES and CAA/Title V field inspectors

**STAY
TUNED**

Permitting LEAN Process Value Stream Mapping

- Mapped out our entire RCRA C Permitting Process

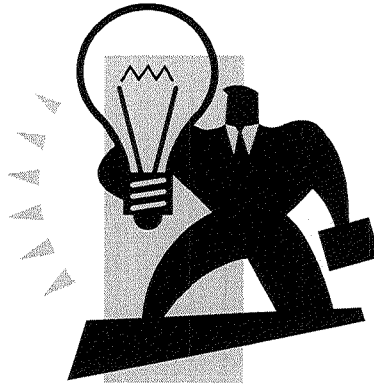


- Looked at the areas where things got “stuck”
 - Administrative Completeness
 - Technical Adequacy

Permitting LEAN Process

Value Stream Mapping

- We generated an Ideas List related to the specific process.

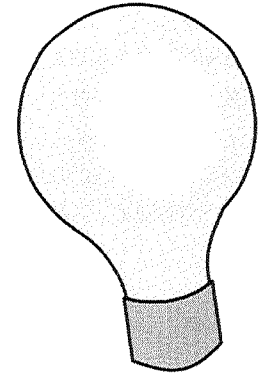


- We generated a Parking Lot list; these are ideas/suggestions not specific to this process but ones that warranted being written down and followed-up at a later date.



shutterstock · 104064977

Value Stream Mapping



Idea Tracking Chart

1. Why is it taking so long to review permit applications? Administrative review is a 21 step process that can be repeated two times if deficiencies are found. The Technical review cannot be completed until the application is administratively complete.
2. Develop a checklist for Administrative Complete Review to be used by ADEQ and external users
3. Send the checklist with the notification of permit expiration and renewal permit application call-in letter.
4. Publish the checklist on ePortal
5. Identify commonly missed items
6. Is there a definition of Administrative Complete? APC&EC Regulation No. 8 provides a definition.
7. Allow facility response to NOD for incomplete submitted to be emailed.
8. Use a standard checklist.
9. Face to face meeting with facilities submitting permit applications to review application for administrative completeness.

Idea Tracking Chart

1. Why is it taking so long?

- NOD doubles length of Admin Review & Delays Tech Review

1st pass 21 steps + Facility Response Time 15-45 day
2nd pass +21 steps + " "
3rd pass +21 steps + " "

2. Develop Checklist^{ed} internal/external (add step)

3. Send w/ reminder letter (add step)

4. Checklist on ePortal

5. Are there commonly missed items?

6. Is there a definition of 'Admin Complete'?

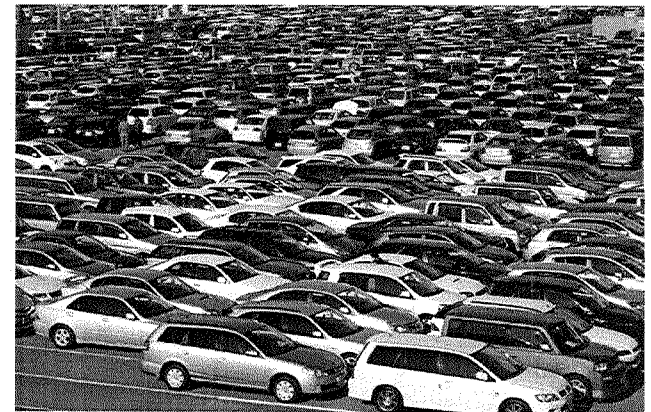
7. Can response be emailed?

Project
Owner
Reg No 8

Value Stream Mapping

Parking Lot Ideas

1. How to streamline processing hardcopy once the document arrives in the building.
 - a. Application received by Project Coordinator
2. Figure out how ePortal connects
3. Face to face team meeting at least once per month
4. Model permit application
5. ADEQ standard policy of 3 strikes and you're out
6. Redline/Strikeout or highlight changed pages
7. ePortal vs Website

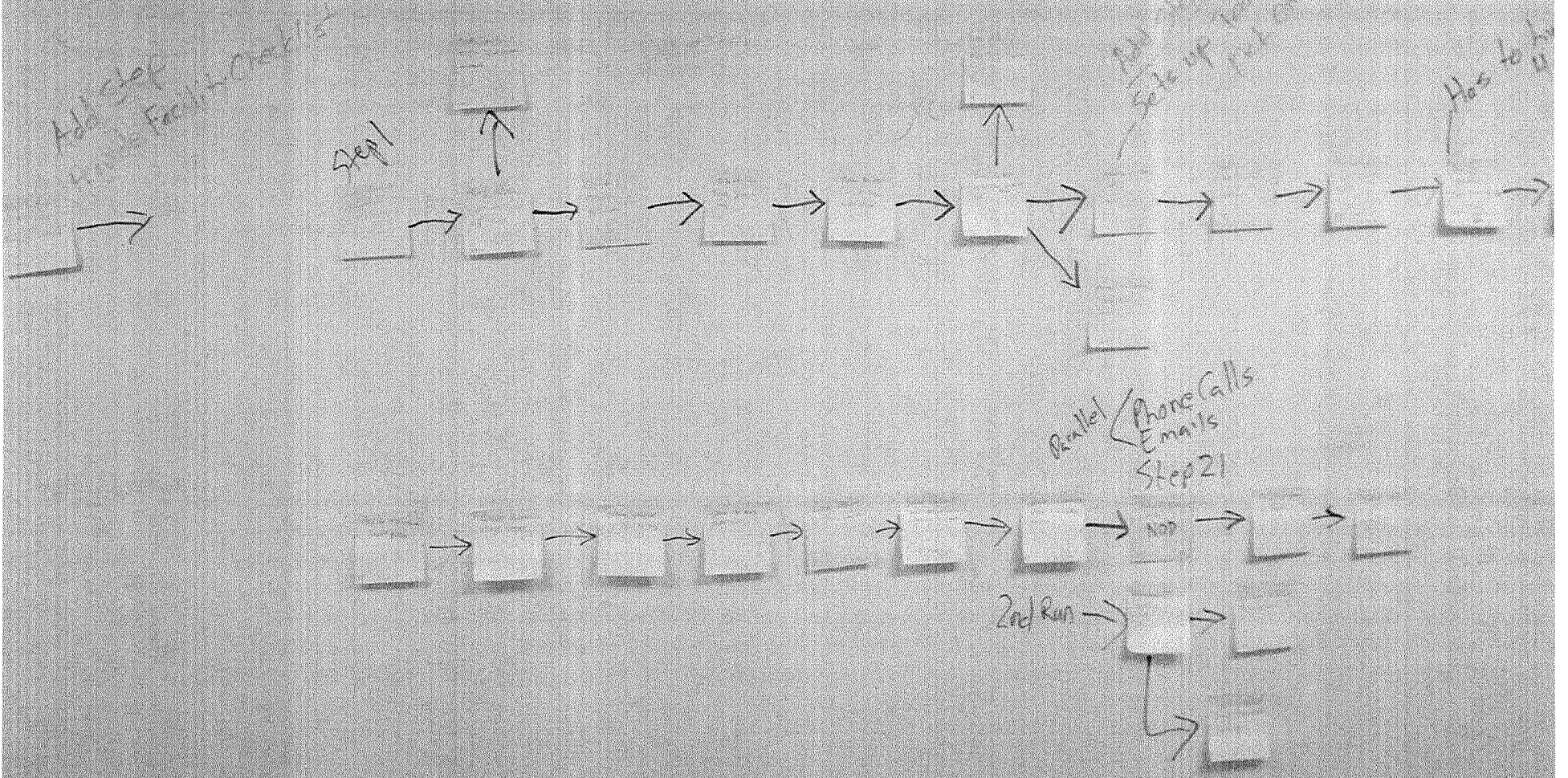


Permitting LEAN Process

Value Stream Mapping

- Conducted a LEAN Process – Value Stream Mapping of the Administrative Completeness Checklist [*originally up to a 42 -63 step process; 3 NODS*].
- Average time originally was 6 to 8 months.
- LEAN Team created an electronic Administrative Completeness Checklist that have hyperlinks to Unit Specific Checklist [**~ 13 step process; No NODs**].
- Average time now is 10 days. The great advantages are:
 - Applicant uses to ensure all necessary information is submitted.
 - ADEQ uses to expedite Administrative review and aids in Technical review.

Current State (Blue)

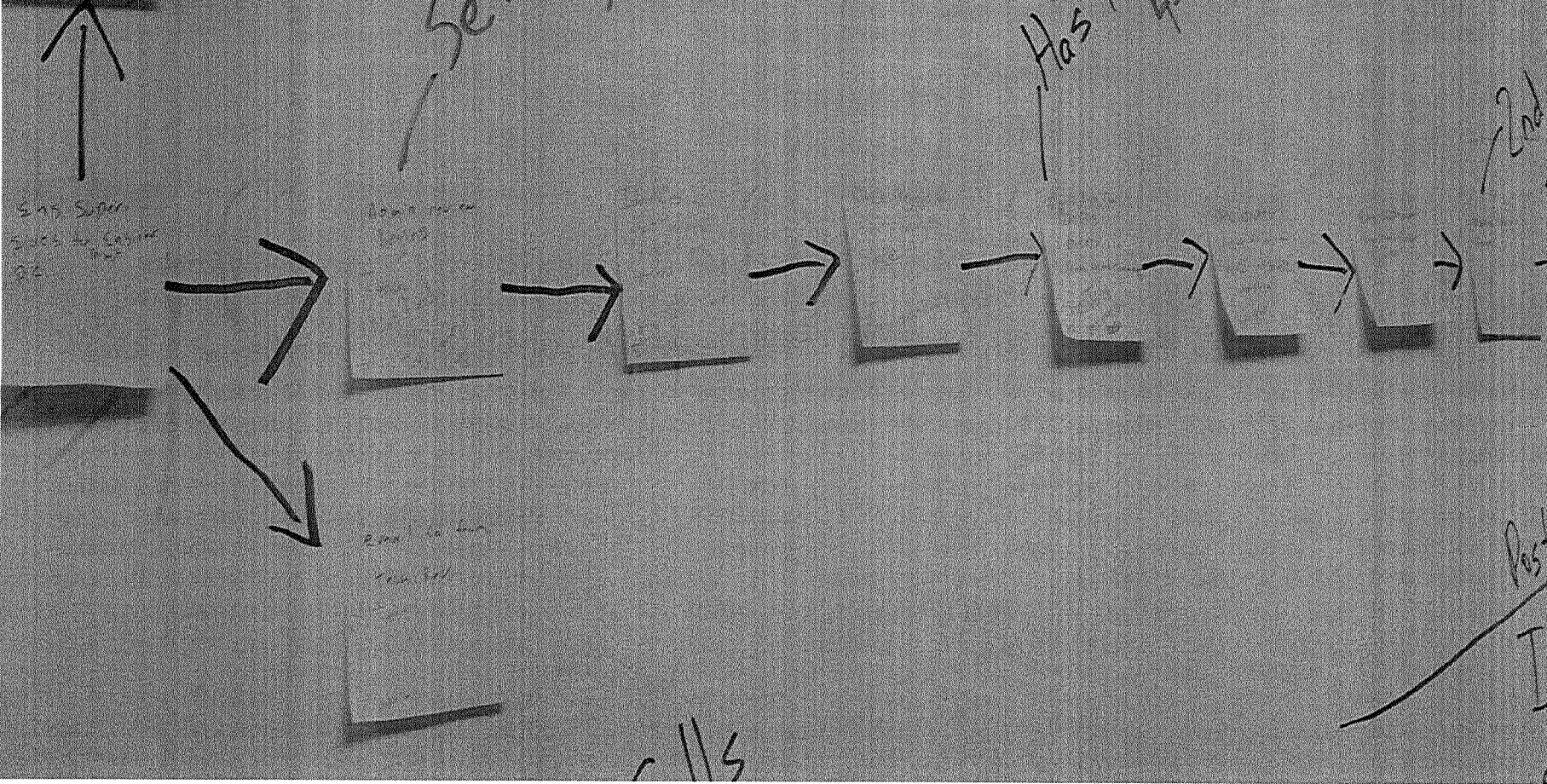


Add 300
Sets up 1000
- first one

Has to hunt for location
4-6 hours

2nd rnd
- Only 1st rnd
→ Everyone

Post-Closure
Initial



Administrative Complete Checklist

<input type="checkbox"/> Arkansas Department of Environmental Quality - Hazardous Waste Division Administrative Complete Checklist									
Facility Name: _____						Date Application Received: ____/____/2015			
AFIN Number: _____						EPA ID Number: _____			
Required in Application *	Facility Specific*	General Permit Application Requirements	Submitted			Permit Application		Comments	
1,2,3,4,5		Permit Application Fee	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
1,2	3,4	Pre-Application Public Notice and Meeting	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
1,2,3,4		Application Public Notice	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
1,2	3,4,5	Complete Copy of Permit Application placed in Information Repository	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
1,2,3,4,5		Notice to Adjacent Landholders and Tenants	Yes	No		<input type="checkbox"/>	<input type="checkbox"/>		
1,2,3,4,5		Table of Contents	Yes	No		After Cover Page			
1,2,3,4,5		Permit Application is a stand alone document with documents incorporated by reference included as attachments. (Ex. Sampling and Analysis Plan, Closure Plan)	Yes	No					
Part A Requirements									
1,2,3,4,5		ADEQ version of RCRA Subtitle C Site Identification Form	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
1,2,3,4,5		EPA version of Hazardous Waste Permit Information Form	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
1,2,3,4,5		Signed by Responsible Official of each applicant	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
1,3		Ownership Disclosure	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
2,4,5		Disclosure Statement	Yes	No	N/A	<input type="checkbox"/>	<input type="checkbox"/>		
*1-TSDF Initial Commercial, 2-TSDF Initial Non-Commercial, 3-TSDF Renewal Commercial, 4-TSDF Renewal Non-Commercial, 5-Post-Closure Corrective Action Only									



Administrative Checklist Use

- ADEQ email's Excel version of checklist to facility simultaneously with the mailing of the 6 month renewal reminder letter.
- Complete facility identification information at top of spread sheet.
- The Administrative Checklist (Summary Tab) contains 4 sections, for each section showing “facility specific” to the side **use the quick reference value*** to determine specific line item requirements.
 - General Permit Application Requirements (facility specific)
 - Part A Requirements (facility specific)
 - Part B Requirements
 - Part B Specific Requirements (facility specific)

**1-TSDF Initial Commercial, 2-TSDF Initial Non-Commercial, 3-TSDF Renewal Commercial, 4-TSDF Renewal Non-Commercial, 5-Post-Closure/Corrective Action Only*



Administrative Checklist Use

- As each required line item is completed:
 - Mark the appropriate cell under the “Submitted” columns (Y, N, NA)
 - If submitted, provide the items location under the “Location of Information” column
 - If any additional information is required discuss in the “Comments or Variations” column. For example discussion of exemption to requirements could be provided.

Part B Specific Checklist

Required in Application *	Facility Specific*	Part B Specific Requirements (See Technical Checklist for details)	Submitted			Location in	
			Yes	No	link to Technical	Permit Application	Comments
	1,2,3,4	Documentation that the requirements for Containers listed in §270.15 are met.	Yes	No	N/A		
	1,2,3,4,5	Documentation that the requirements for Tank Systems listed in §270.16 are met.	Yes	No	N/A		
	1,2,3,4,5	Documentation that the requirements for Surface Impoundments listed in §270.17 are met.	Yes	No	N/A		
	1,2,3,4,5	Documentation that the requirements for Waste Piles listed in §270.18 are met.	Yes	No	N/A		
	1,2,3,4	Documentation that the requirements for Incinerators listed in §270.19 are met.	Yes	No	N/A		
	1,2,3,4,5	Documentation that the requirements for Land Treatment listed in §270.20 are met.	Yes	No	N/A		
	1,2,3,4,5	Documentation that the requirements for Landfills listed in §270.21 are met.	Yes	No	N/A		
	1,2,3,4	Documentation that the requirements for Boilers/Industrial Furnaces listed in §270.22 are met.	Yes	No	N/A		
	1,2,3,4	Documentation that the requirements for Miscellaneous Units listed in §270.23 are met.	Yes	No	N/A		
	1,2,3,4	Documentation that the requirements for Process Vents listed in §270.24 are met.	Yes	No	N/A		
	1,2,3,4	Documentation that the requirements for Equipment listed in §270.25 are met.	Yes	No	N/A		
	1,2,3,4	Documentation that the requirements for Drip Pads listed in §270.26 are met.	Yes	No	N/A		
	1,2,3,4	Documentation that the requirements for Air Emissions listed in §270.27 are met.	Yes	No	N/A		
	5	Documentation that the requirements for Post-Closure listed in §270.28 are met.	Yes	No	N/A		

*1-TSDF Initial Commercial, 2-TSDF Initial Non-Commercial, 3-TSDF Renewal Commercial, 4-TSDF Renewal Non-Commercial, 5-Post-Closure/Corrective Action Only



Administrative Checklist Use

- For each section selected in the “Part B Specific Requirements”, click the “Yes” link to transfer to that specific supplemental technical checklist.
- Once each field has been completed on the supplemental checklist select the “Return to Summary Page” link at bottom of each page to return and select the next “Part B Specific Requirements”.
- Once all the appropriate items have been completed, each page is formatted to print easily
- The printed pages should be included in the Permit Application.
- Upon Receipt of the Application, ADEQ will use the checklists to easily locate each necessary item in the Part B and mark as appropriate if the line item has been submitted and is adequate.

Ultimate Objective/Goals

GOALS

- Efficient quality reviews
- Timely reviews
- Open communication with facility
- Timely issuance of Permits

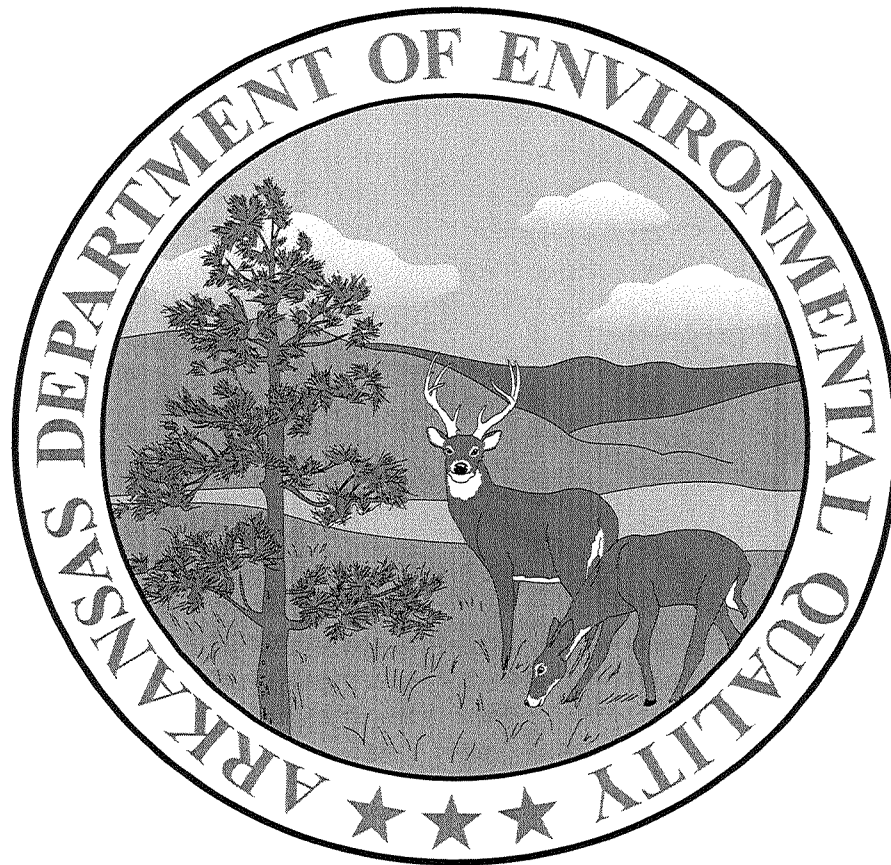
HOW DID WE DO THIS?

Generated a list of all pending reviews

Sorted by Groundwater and Engineering

Established a TEAM to commence review & acknowledgment of submittals

Questions?



Tammie J. Hynum
Sr. Manager
Regulated Waste Programs
Office of Land Resources

501-682-0831