



Title V Administrative Amendments

LEAN Event Report Out

**Department of Environment &
Conservation**

Air Pollution Control

August 28, 2013



Team Members:

- Lida Galbreath (APC)
- Travis Blake (APC)
- Jerry Swinea (APC)
- Jeff Twaddle (ERM)

LEAN Event Team

- Steve Simpson (APC)
- James Smith (APC)
- Julie Aslinger (EnSafe)
- Team Leader – Mark Reynolds (APC)

Sponsor – Barry Stephens (Director - APC)

Executive Sponsor – Shari Meghreblian (Dep. Commissioner – TDEC)

Facilitators – Beth Shelton, Elaine Boyd, Ken Nafe

Business Issues

- Lack of consistency in process across staff
- Backlog of applications
- In FY 12/13, 69 of 157 administrative amendments not acted upon within regulatory time limit (60 days)
- 54 pending in the system currently with 47 of those > 60 days



Scope

- **In scope:**

Starting point: when the permittee submits notification of an amendment that needs to be made



Ending point: completion of amendment and closing internal documentation

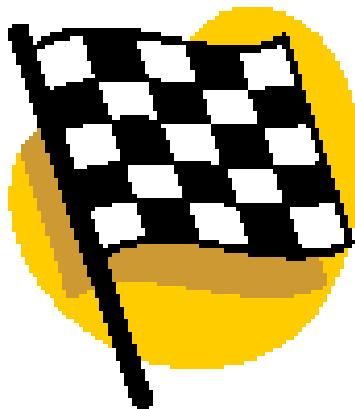


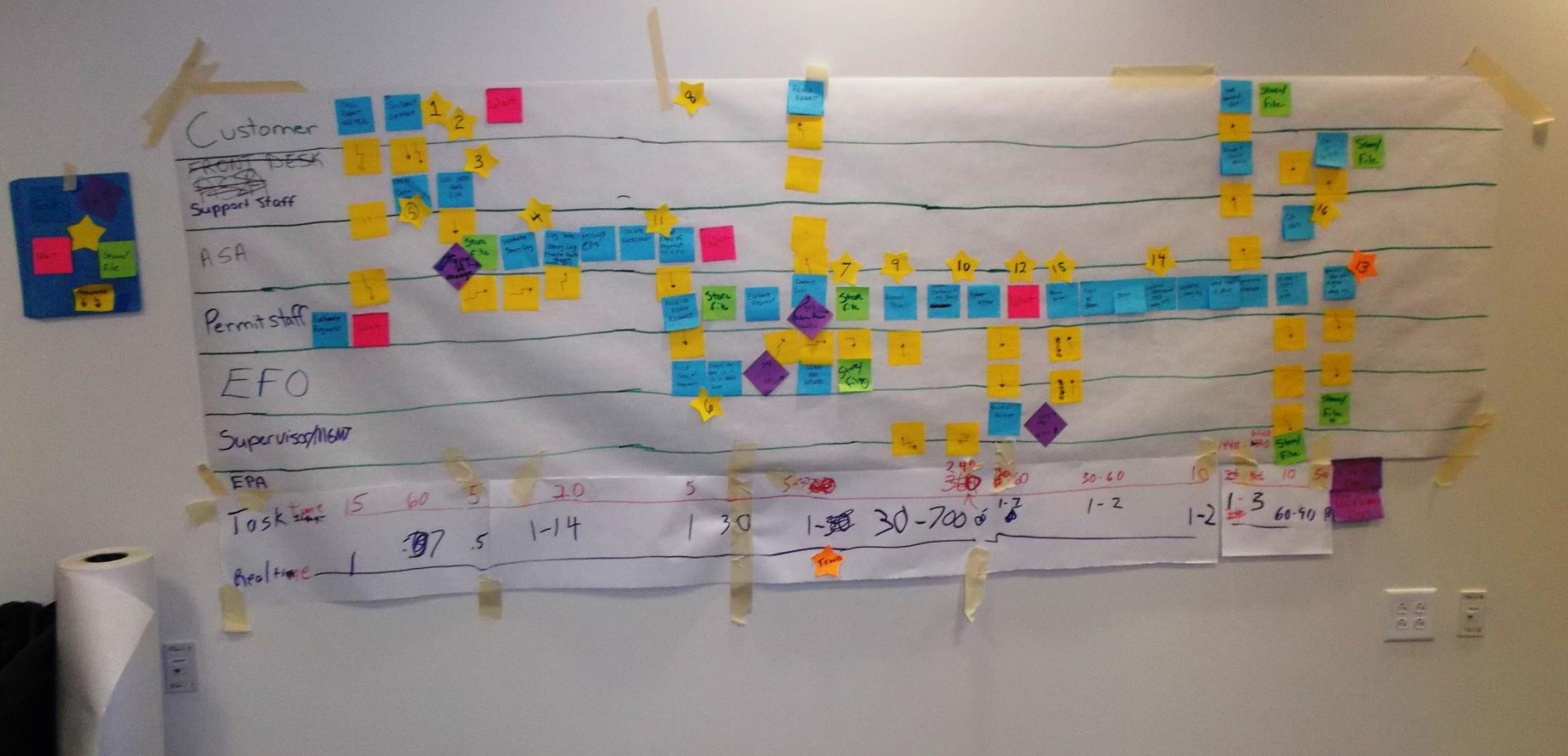
- **Out of scope:** Permit amendments other than administrative amendments (Title V minor modifications)

Note, though “out of scope”, it is likely that some of the improvements from this process can be used to address the Title V minor modifications process.

Goals for Future State Process

- Streamline process to reduce backlog
- Create consistency in the process
- Increase percentage of administrative amendments approved / denied within regulatory time limit to meet goal of 95% by 2015





Observations of Current State

- Revelation of how inconsistent we are in what we do.
- Permittee is allowed to have several different responsible officials so why are names put on the cover of the permit? That placement of the names is what triggers the need for an administrative amendment when there is a change. Is there a regulatory basis for the name and/or notification?
- Are there actions that we are using the administrative amendments for unnecessarily or inappropriately?



Current State Statistics

Title V Administrative Amendments

	Current	Future	Difference
Tasks	34		
Waits	4		
Handoffs	16		
Decisions	4		
Work Time	4 – 11 days		
Elapsed Time	106 – 860 days (2.4 years)		

Recommendations

- Issue:** (1) 54 administrative amendments currently in system (47 already past 60 days) which require focused action.
- (2) Current database metrics include administrative amendments that have already been combined with another permit action.

Action: APC management provides mandate that by 9/30/13 backlogged requested amendments be:

- Approved or denied; or
- Combined with a completed or pending action in SmogLog.
- Notify company as appropriate.

Recommendations

Issue: Administrative amendments traditionally have had a low priority for staff. Now there is a need for the prioritization to be raised in response to the new emphasis on the regulatory timeframe for issuance.

Action: There will be a need for staff and managers to utilize the SmogLog reporting to determine the current status of work in progress against the regulatory deadline.

Recommendations

Issue: Decisions need to be made, and clear criteria developed, on what activities should be addressed with an administrative amendment (e.g., responsible officials, parameters such as pressure drops, insignificant activities, truth in accuracy statement, etc.) and what the process is.

Action: Management determination of activities to be addressed with an administrative amendment.

Action: Development of internal and external communication of the activities that should be addressed through the use of an administrative amendment and the process.

Recommendations

Issue: New emphasis on meeting regulatory timeframes for issuance may call for additional tools for permit writers and managers to assess priorities for work in process.

Action: Work with ISD to modify My Reports in SmogLog to provide a report that allows the permit writers and managers to see work in progress and the time remaining until the regulatory time limit expiration. LEAN team members will serve as beta testers for report.

Recommendations

Issue: Current inconsistency in implementation of administrative amendment process.

Action: Document future state in SOP and instructions that are utilized to train staff on the new process.

Recommendations

Issue: Consistent implementation of new process will require training of staff and revision of route sheet to mirror new process.

Action: Develop training on activities that require use of administrative amendments, new template to be used for cover letter and instructions for process.

Recommendations

Issue: Currently, changes in technical contacts and responsible officials require an administrative amendment; however, federal regulations indicate that the permit can contain a condition requiring notification of these changes, but not an administrative amendment.

Action: Obtain written determination from EPA of what notification is required and the regulatory basis for that requirement.

Action: If it is determined that changes in technical contacts and responsible officials do not require an administrative amendment, revise existing permits (when other actions are underway) to change the cover page of the permits and incorporate condition.

Recommendations

Issue: Process traditionally has been primarily paper; however, the Division is emphasizing the need to move to a paperless environment. An RDA allowing electronic storage of documents has been awaiting approval for over a year.

Action: Convert to electronic format using SmogLog for storage.

Recommendations

Issue: Inconsistency exists across multiple processes.

Action: Apply LEAN principles to institute consistency across all division processes. The team's recommendation is to look into the minor modification process next.

Recommendations

Issue: Clear ownership of process needs to be determined to ensure continuous assessment of effectiveness and efficiency of process.

Action: ???



Future State

Future State Statistics

Title V Administrative Amendments

	Current	Future	Difference
Tasks	34	23	11
Waits	4	3	1
Handoffs	16	9	7
Decisions	4	2	2
Work Time	4 – 11 days	0.5 – 1 day	3.5 – 10 days
Elapsed Time	106 – 860 days (2.4 years)	28 – 59 days (20 – 51 days for the regulatory time)	78 – 801 days

Benefits of Future State

- Clarity about the use of administrative amendment process should be beneficial internally and externally.
- Saving the amendment and associated documents in electronic PDF format on SmogLog will save file space and associated costs.
- Streamlined process should allow more administrative amendment applications to be addressed within the regulatory time limit.
- Reduction of unnecessary scanning and movement by people reduces wear and tear on staff and equipment.
- Many of the steps in the future state can be applied to streamline other processes.
- New My Report in SmogLog should assist staff and managers in managing workflow.

Action Plan

What	When	Who
Backlog instructions completed	9/4/13	Steve & Lida
Meeting to instruct how to handle backlog	9/6/13	Steve, Lida & Barry
Work flow outline	9/6/13	Elaine
Draft instructions for new process to group	9/13/13	Steve, Lida & Mark
Comments on instructions by group	9/18/13	Team
Send instructions to management	9/25/13	
Finalized instructions on new process	10/2/13	Barry
Drafted email going out to Division	9/23/13	Facilitators
Email concerning new process out to Division	9/30/13	Barry
Definition/Clarification of Admin. Amend.	9/20/13	Lacey

Action Plan

What	When	Who
Overview of new process at staff meeting	10/15/13	Team
Meeting in central office for roll out	10/22/13	Mark
Guidance documents developed for website	10/1/13	Jeff
Obtain formal document from EPA concerning technical contact/responsible official	?	Lacey & Travis
My Reports section in Smog Log updated	?	Travis
Cover letter template	10/22/13	James
Division converts to using Smog Log	10/22/13	Team
Apply LEAN concepts to other processes for consistency		Barry
Taking ownership		Barry

Measuring and Sustaining Improvements

- LEAN follow up intervals:
 - 30 days
 - 60 days
 - 90 days
 - 180 days
- Tracking of adherence to regulatory 60-day action requirement.
- Backlog.

Bottom Line!

- Key Elements for Future: We are.....
 - Moving the prioritization of permits to regulatory deadlines instead of type of permit or permitting action.
 - Taking the initial steps to streamline all workflow processes by providing tools to manage based on workflow deadlines.
 - Streamlining the process by utilizing an electronic review process.
 - Standardizing the process to institute more consistency.
- Result?
 - Administrative amendments should be able to be completed within the regulatory time frame.
 - Backlog will be eliminated in the near future.
 - Customer will have access to instructions on the process which should eliminate some of the current vagueness.
 - Establish framework/procedures that can be used to improve other processes.

Questions/ Comments

