

Office of Environmental Compliance
Five Year Strategic Plan
July, 2014 - June 2019

Agency Number: 13-851
Program: Environmental Compliance Program
Program Authorization: La. R.S. 30:2011.C(1)(c)

Vision

The Environmental Compliance Program is committed to the protection of health, safety and welfare of the people and environmental resources of Louisiana, through the processes of inspections, licensing and registration of sources of radiation, enforcement, and assessing the quality of air and water to sustain and enhance the quality of life for its citizens.

Mission

The mission of the Environmental Compliance Program, consisting of the Inspection, Assessment, Enforcement, and Underground Storage Tank and Remediation Divisions, is to protect the health, safety and welfare of the people and environmental resources of Louisiana. The Environmental Compliance Program protects the citizens of the state by conducting inspections of permitted and non-permitted facilities, assessing environmental conditions, responding to environmental incidents such as unauthorized releases, spills and citizen complaints, by providing compliance assistance to the regulated community when appropriate. This program establishes a multimedia compliance approach; creates a uniform approach for compliance activities; assigns accountability and responsibility to appropriate parties; and provides standardized response training for all potential responders. The Environmental Compliance Program provides for vigorous and timely resolution of enforcement actions.

Philosophy

The Environmental Compliance Program will endeavor to operate in a fair and consistent manner, to achieve compliance with environmental regulations, and to ensure protection of our valuable environmental resources and human health. The Environmental Compliance Program will adopt the following principles to accomplish a successful environmental compliance program:

- Maintain good working relationships with the public and the regulated community through better education regarding environmental problems.
- Operate within the constraints of the law in a fair, objective, and consistent manner that maintains high professional and ethical standards.
- Incorporate non-confrontational methods and approaches to problem solving.

Goal

The goals of the Environmental Compliance Program are to operate in an open, fair, and consistent manner; to strive for and assist in attaining environmental compliance in the regulated community; and, to protect environmental resources and the health and safety of the citizens of the State of Louisiana.

Objective 1:

The Environmental Compliance Program, through the inspection activity, will inspect regulated facilities related to air emissions, solid and hazardous waste, waste tires, water discharges, and asbestos statewide following procedures outlined in the Compliance Monitoring Strategy (CMS) July 1, 2014 through June 30, 2019.

Facilities are selected for inspections, utilizing the procedures outlined in the CMS, to determine compliance with federal and state regulations and to ensure protection of public health and the environment.

Strategies:

- 1.1 Perform compliance inspections of facilities for air, water, hazardous waste and solid waste as outlined in the CMS.
- 1.2 Provide requisite compliance data for appropriate databases.

Performance Indicator:

Outcome: Percent of air Title V facilities inspected
 Percent of hazardous waste treatment, storage and disposal facilities inspected
 Percent of permitted solid waste facilities inspected
 Percent of major water facilities inspected
 Percent of significant minor water facilities inspected
 Percent of tire dealers inspected

Output (GPI): Number of top-rated asbestos projects inspected.

Objective 2:

The Environmental Compliance Program, through the inspection activity, will monitor and sample approximately 25% of targeted surface water subsegments from 478 named waterbody subsegments statewide annually July 1, 2014 through June 30, 2019.

Strategies:

- 2.1 Collect data on the quality of state waters that can be compared to State Water Quality Standards by sampling all ambient water subsegments in the state on a four year rotation by selecting specific watersheds each year in each region.

Performance Indicator:

Outcome: Percent of waterbody subsegments monitored and sampled.

Objective 3:

The Environmental Compliance Program, through the inspection activity, will address 85% of reported environmental incidents and citizen complaints within ten business days of receipt of notification from Single Point of Contact (SPOC) July 1, 2014 through June 30, 2019.

Strategies:

- 3.1 Respond to unauthorized releases in an expedient manner and ensure an acceptable level of clean up.
- 3.2 Provide timely response to citizen complaints of environmental problems. Maintain “on-call” response procedures that provide for response capability seven days per week.

Performance Indicators:

Efficiency: Percent of environmental incidents and citizen complaints addressed within ten business days of receiving notification.

Input (GPI): Number of spill notifications.
Number of citizen complaints.

Objective 4:

The Environmental Compliance Program through the assessment activity will assess and protect the general public’s safety regarding ambient air quality analysis, the operation of nuclear power plants, the use of radiation sources, and radiological and chemical emergencies statewide July 1, 2014 through June 30, 2019.

Strategies:

- 4.1 Design, implement and maintain the statewide ambient air quality network.
- 4.2 Provide requisite monitoring data for appropriate EPA databases.
- 4.3 Annually validate ambient air toxic data for use in determining compliance with standards and reporting emissions to EPA and the public.
- 4.4 Periodically review and update of the Louisiana Peacetime Radiological Response Plan and operating procedures.
- 4.5 Maintain 24-hour readiness to respond to nuclear power plant incidents by providing radiological emergency response training to Emergency and Radiological staff, as well as personnel identified Department-wide.
- 4.7 Maintain radiation survey equipment, air radiation sampling equipment, personnel exposure recording devices and supplies of thyroid blocking drugs.
- 4.8 Maintain currency of the Annual Letter of Certification (ALC) to provide records to FEMA on meeting a subset of planning standards set forth in federal guidance “NUREG-0654, FEMA-REP-1, Rev. 1” regarding training, drills, equipment, public information and media relations.
- 4.9 Provide effective radiation protection by registering radiation-producing machines, by licensing radioactive materials, including Naturally Occurring Radioactive Material, and by the certification of industrial radiographers.
- 4.10 Process and issue completed license and registration action requests.
- 4.11 Maintain 24-hour readiness to respond to chemical releases, transportation accidents and spills requiring air monitoring, sampling, and analysis to determine actual or potential harmful impact to public health or the environment.

Performance Indicators:

Outcome: Percent of ambient air data captured and reported per the federal requirements for criteria air pollutants
 Percent of emergency planning objectives demonstrated.
 Process 97% of radioactive material applications for registration, licensing, and certification within 30 business days of receipt.
 Percent of radiation licenses inspected
 Percent of x-ray registrations inspected
 Percent of mammography facilities inspected

Objective 5:

The Environmental Compliance Program through the enforcement activity will increase compliance with environmental laws and regulations statewide by implementing a comprehensive enforcement process including regulatory awareness July 1, 2014 through June 30, 2019.

Strategies:

- 5.1 Issue Cease and Desist Orders within 48 hours of finalization of investigation.
- 5.2 Issue Penalty Assessments within the prescribed time period for completion of the investigation.
- 5.3 Issue Compliance Orders within the prescribed time period for documentation confirming continued non-compliance.
- 5.4 Provide requisite enforcement data for appropriate EPA databases.
- 5.5 Conduct Sanitary Wastewater Compliance Assistance Training (SWAT) classes.

Performance Indicators:

- Efficiency: Percent of enforcement actions issued within the prescribed timelines.
- Outcome: Percent of SWAT class invitees that will resolve their violations with no further enforcement action.
- Output (GPI): Number of air quality enforcement actions issued.
Number of solid waste enforcement actions issued.
Number of hazardous waste enforcement actions issued.
Number of water quality enforcement actions issued.
Number of radiation enforcement actions issued.

Objective 6:

The Environmental Compliance Program through the underground storage tank and remediation activity will investigate and clean up uncontrolled contamination and/or monitor ongoing cleanup at abandoned properties, active facilities, and underground storage tank (UST) sites statewide making them safe for reuse and available for redevelopment, and ensure the integrity of the UST system by inspecting UST sites July 1, 2014 through June 30, 2019.

Strategies:

- 6.1 Oversee and streamline the implementation of the RCRA Corrective Action Program.
- 6.2 Focus appropriate program resources and actions on GPRA-listed facilities.

- 6.3 Address immediate threats to human health and the environment and maximize actual environmental results by removal, treatment, or containment of contaminants.
- 6.4 Perform compliance inspections of underground storage tank facilities to verify compliance with state and federal regulations.
- 6.5 Provide requisite compliance data for appropriate federal databases.
- 6.6 Provide information necessary to support enforcement actions where warranted.
- 6.7 Provide necessary oversight and direction to close UST incidents where appropriate.

Performance Indicators:

- Outcome: Cumulative number of sites evaluated and closed out.
 Cumulative percentage of closed out sites that are ready for continued industrial/commercial/residential use or redevelopment.
 Cumulative percentage of Government Performance Results Act (GPRA) facilities with remedies selected for the entire facility.
 Cumulative percentage of GPRA facilities with remedy completed or remedy construction completed for the entire facility.
 Cumulative percentage of registered underground storage tank sites inspected.
- Output (GPI) Cumulative number of sites returned to active commerce through DEQ’s voluntary clean-up program.

Objective 7:

The Environmental Compliance Program through the underground storage tank and remediation activity will direct the determination of the extent of contamination both laterally and vertically at sites with pollution and to protect the soil and groundwater resources of the state by reviewing 90% of the soil and groundwater investigation work plans and corrective action work plans received July 1, 2014 through June 30, 2019.

Strategies:

- 7.1 Guide and direct the investigation of sites identified as contaminated in the State by reviewing investigation work plans.
- 7.2 Conduct appropriate administrative follow-up for each investigation work plan.
- 7.3 Inspect investigation activities periodically to ensure assure that work is being performed in accordance with the approved work plan.

- 7.4 Select potentially contaminated sites from Underground Storage Tanks and Remediation Division data and perform assessment to determine the existence of soil and/or groundwater contamination according to established divisional procedures.
- 7.5 Seek to return sites to active commerce through the Voluntary Remediation Program (Vision 2020 Objective 3.8.5).
- 7.6 Guide and direct the remediation of contaminated sites by reviewing corrective action work plans.
- 7.7 Conduct appropriate administrative follow-up for each corrective action work plan.
- 7.8 Inspect remediation activities periodically to ensure that work is being performed in accordance with approved work plans.
- 7.9 Conduct comprehensive groundwater monitoring evaluations (CMEs) and operation and maintenance inspections (O&Ms).
- 7.10 Provide requisite RCRA data for appropriate EPA databases

Performance Indicators:

Outcome: Cumulative percentage of soil and groundwater investigation work plans reviewed.
Cumulative percentage of soil and groundwater corrective action work plans reviewed.