

# FISCAL YEAR 2013 WORK PLAN

(July 1, 2012 – June 30, 2013)

## Inspection Division

Office of Environmental Compliance

Tom Killeen, Administrator

2nd qtr update

**Mission**

The mission of the Office of Environmental Compliance (OEC) is to ensure the public welfare of the people and environmental resources of Louisiana by conducting inspections of permitted facilities and activities, responding to environmental emergencies and issuing sound enforcement actions. The OEC consists of 4 divisions: Inspections, Enforcement, Assessment and Remediation/UST Divisions. OEC Inspection Division protects the citizens of the state by conducting inspections of permitted and non-permitted facilities, by responding to environmental incidents such as unauthorized releases, spills and citizen complaints, natural disasters, and other emergency situations, by providing compliance assistance to the regulated community when appropriate, by assessing and monitoring air and water quality standards for compliance, and by promoting case information management for vigorous and timely resolution of issues of non-compliance.

<p><b>Objective 1: The Inspections Division will inspect regulated facilities for compliance with applicable law and regulation following procedures outlined in the Compliance Monitoring Strategy (CMS) and required by LRS 30:2011.D.</b></p> <ol style="list-style-type: none"> <li>1. Inspect 50% of Air Title V facilities (251 of 502)</li> <li>2. Inspect 20% of Air Synthetic Minor facilities (19 of 95)</li> <li>3. Inspect 50% of Water major facilities (113 of 226)</li> <li>4. Inspect 20% of Water significant minor facilities (351 of 1755)</li> <li>5. Inspect 25% of sludge hauler applicants (61 of 244)</li> <li>6. Inspect 50% of Hazardous Waste TSD facilities (25 of 51)</li> <li>7. Inspect 20% of Hazardous Waste LQG facilities (98 of 436)</li> <li>8. Inspect varying percentages of the remainder of remaining Hazardous Waste universe, which includes SQG, CESQG, and used oil facilities.</li> <li>9. Inspect 70% of Solid Waste facilities (145 of 207)</li> <li>10. Inspect 20% of waste tire generators (620 of 3098)</li> <li>11. Inspect 85% of asbestos top priority projects (varies, 340 for FY12)</li> <li>12. Asbestos Management Plans (150 per year)</li> </ol>	<p>For more information on this project, please contact:</p> <p>1, 2. Keith Jordan P: 225-219-3613 E: <a href="mailto:Keith.Jordan@la.gov">Keith.Jordan@la.gov</a></p> <p>3-5. Dwight Bradshaw P: 504-736-7714 E: <a href="mailto:Dwight.bradshaw@la.gov">Dwight.bradshaw@la.gov</a></p> <p>6-10. Phyllis Luke P: 225-219-3617 E: <a href="mailto:Phyllis.luke@la.gov">Phyllis.luke@la.gov</a></p> <p>11, 12. Sherri Courtney P: 225-219-3334 E: <a href="mailto:sherri.courtney@la.gov">sherri.courtney@la.gov</a></p> <p>11, 12. Robin St. Pierre P: 225-219-3641 E: <a href="mailto:robin.st.pierre@la.gov">robin.st.pierre@la.gov</a></p>	<p><u>Status/Updates:</u></p> <p><u>2nd qtr status:</u></p> <ol style="list-style-type: none"> <li>1. 20% targeted, 21% achieved</li> <li>2. 10% targeted, 12% achieved</li> <li>3. 20% targeted, 23% achieved</li> <li>4. 8% targeted, 9% achieved</li> <li>5. 25% targeted, 29% achieved</li> <li>6. 21% targeted, 21% achieved</li> <li>7. 11% targeted, 11% achieved</li> <li>8. 8% targeted, 8% achieved</li> <li>9. 32% targeted, 35% achieved</li> <li>10. 9% targeted, 10% achieved</li> <li>11. 85% targeted, 89% achieved</li> <li>12. 48 targeted, 48 inspected</li> </ol>
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<p><b>Objective 2: The Inspection Division will address reported environmental incidents and citizen complaints, with 85% being addressed within ten business days of receipt of notification.</b> For this objective the number of spill notifications and the number of citizen complaints is reported annually, at the end of the fiscal year.</p> <ul style="list-style-type: none"> <li>Respond to unauthorized releases in an expedient manner and work with other divisions to ensure an acceptable level of clean up.</li> <li>Provide timely response to citizen complaints of environmental problems.</li> <li>Maintain “on-call” response procedures with other divisions to provide critical agency response capability seven days per week.</li> <li>Participate in notification procedure evaluation to ensure timely and efficient dispatch of regional staff to reported environmental incidents.</li> </ul>	For more information on this objective, please contact:	<u>Status/Updates:</u>
	<p>Tom Killeen  P: 225.219.3615  E: <a href="mailto:Tom.killeen@la.gov">Tom.killeen@la.gov</a></p> <p>Regional Managers  <a href="http://www.deq.louisiana.gov/portal/ABOUT/ContactInformation.aspx">http://www.deq.louisiana.gov/portal/ABOUT/ContactInformation.aspx</a></p>	<p><u>2nd qtr status</u></p> <ul style="list-style-type: none"> <li>85% targeted, 88% achieved</li> <li>Inter-divisional review of notifications procedure conducted, implemented</li> </ul>

<p><b>Objective 3: The Inspection Division will collect water quality data on approximately 25% of 478 named water body sub-segments statewide annually.</b></p> <ul style="list-style-type: none"> <li>Collect data on the quality of state waters that can be compared to State Water Quality Standards by sampling all ambient water sub-segments in the state on a four year rotation by selecting specific watersheds each year in each region. Data is maintained in EQUIS.</li> <li>The Operational Plan performance indicator for this objective is the percent of water body sub-segments monitored and sampled. See Appendix A for the list of water body sub-segments targeted this year.</li> <li>Additional data collection may occur during investigations of watersheds demonstrating impairment.</li> <li>Participate in water quality condition assessment process evaluation to ensure efficient allocation of agency resources.</li> </ul>	For more information on this project, please contact:	<u>Status/Updates:</u>
	<p>Dwight Bradshaw  P: 504.736.7714  E: <a href="mailto:Dwight.bradshaw@la.gov">Dwight.bradshaw@la.gov</a></p>	<p><u>2nd qtr status</u></p> <ul style="list-style-type: none"> <li>All targeted sample sites (25% of universe) visited</li> <li>Watershed investigations on-going in each region</li> </ul>

<p><b>Objective 4: Response to major environmental incidents. This objective addresses unknown response activities and is not part of the Operational Plan or PPG commitments. The division, with other DEQ divisions, participates and provides technical expertise and support as part of multi-agency efforts related to response to major environmental incidents, such as hurricanes, floods, train derailments, oil spills, and well blow outs. Resource expenditures will be reported as staff-days applied to each incident.</b></p> <ul style="list-style-type: none"> <li>• BP MC252 Oil Spill</li> <li>• Miss. River Flood</li> <li>• Ongoing hurricane demolition oversight</li> <li>• Emergency Debris Site pre-approval inspections and re-certifications</li> <li>• Provide for annual disaster preparedness review and ensure adequate training of staff for large scale responses within the NIMS Incident Command Structure</li> <li>• Seafood Safety Response Plan (BP)</li> <li>• Bayou Corne Sinkhole</li> <li>• Hurricane Isaac</li> <li>• Orphan Container Project</li> </ul>	<p>For more information on this project, please contact:</p>	<p><u>Status/Updates:</u></p>
	<p>Tom Killeen  P: 225-219-3615  E: <a href="mailto:Tom.killeen@la.gov">Tom.killeen@la.gov</a></p>	<p><u>2nd qtr status</u></p> <ul style="list-style-type: none"> <li>• BP MC252 – still active in IMT, SCAT and NRDA activities</li> <li>• Hurricane Isaac - 4,591 assessments and inspections in response</li> <li>• Post-Katrina demolitions still on-going</li> <li>• Debris site inspections and evaluations are current</li> <li>• Seafood Safety Response Plan complete, sampling initiated and on-going per work plan</li> </ul>

<p><b>Objective 5: Initiatives. This objective includes known projects at the time of the work plan’s development and is not part of the Operational Plan or PPG commitments. Other initiatives may arise during the subject work plan period. Resource expenditures will be reported as staff-days applied to each project.</b></p>	<p>For more information on this objective, please contact:</p>	<p><u>Status/Updates:</u></p>
<ul style="list-style-type: none"> <li>• Environmental Results Program</li> <li>• Watershed Investigations (Inspecting for Results)</li> <li>• Integrate WQ monitoring into TEMPO</li> <li>• Lead-contaminated soils in New Orleans</li> </ul>	<p>Tom Killeen  P: 225.219.3615  E: <a href="mailto:Tom.killeen@la.gov">Tom.killeen@la.gov</a></p>	<p><u>2nd qtr status</u></p> <ul style="list-style-type: none"> <li>• ERP Round 2 inspections completed</li> <li>• ERP “Field Guide” finalized</li> <li>• Watershed investigations occurring in all regions as time and resources allow, Caney Lake watershed subject of this and next qtr</li> <li>• WQ monitoring activity entry into TEMPO has benefited from internal meetings with ISD. Testing on the process on-going, bugs being worked</li> <li>• On lead-contaminated soils: RSD is the lead and ID assisting, when needed.</li> </ul>

<p><b>Objective 6. Promoting effective case management to efficiently address issues of non-compliance.</b></p> <ul style="list-style-type: none"> <li>• DCL-Bs to liaise between Enforcement staff, Legal staff, Permit staff and regional DCL-As/Supervisors on ensuring clear expectations for case information needs.</li> <li>• Routine meetings to discuss real examples of referrals that were NFA'd and why.</li> <li>• Explore obstacles to rapid enforcement action issuance, including regionally issued enforcement actions.</li> <li>• Consider quality of regulations; make referrals to permits/ to foster continual improvement of environmental requirements.</li> </ul>	<p>For more information on this objective, please contact:</p>	<p><u>Status/Updates:</u></p>
	<p>Tom Killeen  P: 225.219.3615  E: <a href="mailto:Tom.killeen@la.gov">Tom.killeen@la.gov</a></p>	<p><u>2nd qtr Status:</u></p> <ul style="list-style-type: none"> <li>• This objective being addressed through implementation of regional enforcement actions, referrals to Permits for issues requiring more bright-lined regulation will be considered, and statewide media-specific training to gain staff consistency across regions</li> </ul>

<p><b>Objective 7: Resource Management. To ensure the Division maintains an adequate field presence with properly trained staff.</b></p>	<p>For more information on this project, please contact:</p>	<p><u>Status/Updates:</u></p>
<ul style="list-style-type: none"> <li>• Productivity analysis – the IWAL will be implemented to provide direct measure of Division resource allocations and integrated with TEMPO data for effective mission management.</li> <li>• Evaluate effectiveness of IWAL for modification, continuation.</li> <li>• Continue to evaluate training needs and apply opportunities as time and resources allow</li> <li>• Internal assessments used to assist in documentation of competency in PPRs consistently across regions</li> <li>• Evaluate regional offices as to staffing and space needs</li> <li>• Continue vehicle usage assessments</li> </ul>	<p>Tom Killeen  P: 225.219.3615  E: <a href="mailto:Tom.killeen@la.gov">Tom.killeen@la.gov</a></p> <p>Regional Managers  <a href="http://www.deq.louisiana.gov/portal/ABOUT/ContactInformation.aspx">http://www.deq.louisiana.gov/portal/ABOUT/ContactInformation.aspx</a></p>	<p><u>2nd qtr Status:</u></p> <ul style="list-style-type: none"> <li>• IWAL being used to export DCL productivity</li> <li>• Managers encouraged to conduct internal assessments and document.</li> <li>• Barrier to productivity identified in speed of data transmission in regions</li> <li>• Training will follow IDP protocols</li> <li>• Vehicle usage tracking and reporting system adequate and in place.</li> </ul>