



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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**Edmund G. Brown Jr.**  
Governor

TO: Michael Cohen  
Director, California Department of Finance

FROM: Miriam Barcellona Ingenito   
Acting Director

DATE: June 30, 2014

SUBJECT: CORRECTIVE ACTION PLAN 6-MONTH UPDATE (CAP REPORT) TRANSMITTAL

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In accordance with the Financial Integrity and State Manager's Accountability Act of 1983 and Department of Finance Audit Memorandum Number 11-02, the Department of Toxic Substances Control (DTSC) submits this six month status report. This report reflects areas with ongoing corrective action as reported in DTSC's biennial internal control review ending December 31, 2013.

If you have any questions regarding this report, please contact Michael O'Docharty at (916) 322-7856 or by email at [michael.odocharty@dtsc.ca.gov](mailto:michael.odocharty@dtsc.ca.gov).

Attachment

**Corrective Action Plan**

**Name of Department:** Department of Toxic Substances Control

**Organization Code:** 3960

**Signature of Director:** 

Corrective Action Plan Submitted for:  
June 30, 2014 Report

**1. Cost Recovery Billing Collections Backlog**

CONTROL WEAKNESS IDENTIFIED	CORRECTIVE ACTIONS TAKEN	STATUS
<p>Cost recovery Billing Collections Backlog (Work Plan 2b.) - As of April 2013, DTSC accumulated an estimated \$185 million in unbilled and overdue costs. Costs recorded as unbilled in the Cost Recovery Billing System (CRBS) have historically not followed the same process as invoiced and not collected (Accounts Receivable), for which specific guidelines are set forth in the State Administrative Manual (SAM).</p>	<p>Create a comprehensive work plan to evaluate and take action on unbilled and overdue costs.</p>	<p>A detailed Legacy Backlog Work Plan draft was completed on April 30, 2013.</p>
	<p>Begin statute of limitations (SOL) analysis on certain sites with unbilled and overdue costs to initiate cost recovery efforts.</p>	<p>Cleanup Program staff evaluated 622 sites with unbilled costs of \$5,000 and above using an SOL Worksheet DTSC developed to determine whether the statute of limitations for a cost recovery action has expired. DTSC is evaluating SOL Worksheets to analyze sites with unbilled and overdue costs for cost recovery potential.</p>
	<p>Continue work on the cleanup of unbilled and overdue costs data in the Cost Recovery Billing System (CRBS), including, but not limited to, addressing incorrect charges and clearing existing No Further Cost Recovery Actions (NFCRAs).</p>	
	<p>Continue cleanup of CRBS data.</p>	<p>As of May 2014, a total of 705 of the original 2143 legacy backlog sites with unbilled balances have been resolved and 175 of the original 433 legacy backlog sites with overdue balances have been resolved. <i>Resolved</i> is defined as sites for which no unbilled and overdue costs exist. Legacy backlog sites are sites with unbilled or overdue costs incurred by the Department between July 1, 1987 and December 31, 2012.</p>
	<p>Continue statute of limitations (SOL) analysis on certain sites with unbilled and overdue costs to initiate cost recovery efforts.</p>	
	<p>Begin evaluation of certain sites with unbilled and overdue costs for further cost recovery efforts.</p>	
	<p>Begin potential responsible party (PRP) searches on sites with unbilled and overdue costs as necessary to pursue cost recovery against PRPs.</p>	<p>Resolution occurred through data cleanup, applying payments to historical invoices, and receiving payments from responsible parties.</p>
	<p>Prepare and apply NFCRAs to unbilled costs.</p>	

	<p>Nov. 2013 - Appoint a project lead to oversee DTSC's comprehensive cost recovery effort and identify resources to implement DTSC's plan.</p>	<p>Ms. Terri Hardy was appointed as the Special Assistant for Program Review effective January 6, 2013.</p> <p>The Department's Budget Change Proposal for fourteen (14) staff to assist with cost recovery effort was approved. DTSC is completing hiring the 14 two-year limited term positions in its Office of Legal Counsel (5), Office of Administrative Services (3), and Brownfields and Environmental Restoration (Cleanups) Program (6) to address response costs associated with its legacy backlog and future unbilled and overdue costs.</p> <p>DTSC redirected a Senior Attorney to work on cost recovery-related matters on an almost full-time basis. DTSC redirected a Staff Services Manager I (Specialist) and an Associate Governmental Programs Analyst to work on cost recovery-related matters on a full-time basis.</p>
	<p>Continue cleanup of CRBS data.</p>	<p>The SOL Worksheet evaluation process continues.</p>
	<p>Continue evaluation of unbilled and overdue sites for further cost recovery efforts.</p>	<p>Legacy backlog cost recovery efforts have been effective with regards to resolving unbilled and overdue costs, but it is too early to tell how much money DTSC can expect to collect as a result of these efforts. The cost recovery team is working with Information Technology staff to write a program that will allow detailed tracking.</p>
	<p>Continue PRP searches on these sites with unbilled and overdue costs as necessary to pursue cost recovery against PRPs.</p>	
	<p>Begin referring cases to the Attorney General to pursue cost recovery efforts, including formal settlement negotiations and filing of cost recovery actions.</p>	<p>Cost Recovery and Information Technology staff developed a computer system to track Office of Attorney General referrals.</p> <p>As of May 2013, 16 sites with approximately \$47 million in unrecovered costs have been referred to the Office of the Attorney General for potential litigation.</p>

**Cost Recovery Billing Collections Backlog (Continued)**

CORRECTIVE ACTIONS TO BE TAKEN ONGOING MONITORING	PERSON RESPONSIBLE FOR ACTION (POSITION TITLE)	DATE OF ACTION/PLANNED ACTION
<p>Create technological infrastructure work plan to assist in DTSC's evaluation of sites with unbilled and overdue costs, including EnviroStor improvements allowing DTSC to collect, organize, and evaluate cost recovery data.</p>	<p>Special Assistant for Program Review</p>	<p>Reason for delay: DTSC must wait until FI\$Cal is implemented starting in July 2015 to utilize its improved cost tracking and invoicing system. FI\$Cal is an integrated financial management system for state government in the areas of budgeting, accounting, procurement, and cash management. The main risk associated with FI\$Cal is that it serves traditional financial management needs and may not meet the unique business needs associated with DTSC's recovery of response costs from responsible parties. Modifications to DTSC's legacy Cost Recovery Billing System (CRBS) are risky due to the age and supportability of the system. CRBS was designed years ago to function exclusively as a billing system. DTSC business needs require a billing system and a cost recovery management and reporting system.</p> <p>To fill gaps in CRBS, DTSC has invested in upgrades to its site management data base called EnviroStor by creating a Cost Recovery Page. The page will consolidate some cost recovery information for analysis and reporting. The page is currently in beta testing. Full implementation will occur by August 2014.</p> <p>DTSC's programmers were able to make some improvements to CRBS. Billing classification and billing action options were added to help define and report specific billing activities.</p>

## 2. Cost Recovery Billing System

CONTROL WEAKNESS IDENTIFIED	CORRECTIVE ACTIONS TAKEN	STATUS
<p>Cost Recovery Billing System (Work Plan 2c) – The Cost Recovery Billing System (CRBS) software application is no longer supported by the manufacturer. This places DTSC at risk if the CRBS fails and is unable to create and mail invoices to responsible parties in a timely manner. Additional functionality such as generating collection letters and electronic invoicing and payments are not available as part of the current CRBS. Developing or providing a replacement system with additional functionality for cost recovery has been delayed by restrictions imposed by Budget Letter 08-05, Moratorium on Developing Administrative Information Technology Systems (Fi\$Cal).</p>	<p>Develop and submit Fi\$Cal wave change request in order to move DTSC from Wave 3 to Wave 2.</p>	<p>Request for Fi\$Cal wave change submitted and approved. DTSC is scheduled to start using Fi\$Cal for billing and cost tracking/management in July 2015.</p>
	<p>Facilitate a meeting between DTSC Director and Fi\$Cal Director, on the possibility of DTSC being moved up in Fi\$Cal implementation waves, if needed.</p>	
	<p>Evaluate current system and identify other cost recovery automation solutions that are excluded from BL 08-05 and could be implemented in a new standalone environment, separate from the current CRBS.</p>	<p>Gaps have been identified that present risk to DTSC's implementation of Fi\$Cal. Specifically, the ability to bill multiple Responsible Parties and to access data for billing inquiries is being investigated.</p>
	<p>Identify technical requirements to implement other cost recovery automation improvements.</p>	<p>Technical requirements have been communicated to Fi\$Cal project managers.</p>
	<p>Working with Fi\$Cal staff, identify business process changes required for Fi\$Cal implementation.</p>	<p>DTSC staff attended the Wave 2 Billing Solution Walkthrough but the Department's requirements were not implemented. DTSC and Fi\$Cal staff met to discuss DTSC's requirements and Fi\$Cal's corresponding capabilities, such as sending invoices to multiple parties.</p>
	<p>Develop new automated tools and/or processes for cost recovery.</p> <p>Develop new automated tools and/or processes for cost recovery. Test and implement these tools.</p>	<p>DTSC staff implemented new Billing Classifications and Billing Actions reflected in Department Procedure Memorandums. A new Collaboration SharePoint site has been implemented to track workflows and documents associated with cost recovery. EnviroStor database modifications continue.</p>

### Cost Recovery Billing System (Continued)

CORRECTIVE ACTIONS TO BE TAKEN ONGOING MONITORING	PERSON RESPONSIBLE FOR ACTION (POSITION TITLE)	DATE OF ACTION/PLANNED ACTION
<p>Identify Fi\$Cal training needs for DTSC staff in preparation for Fi\$Cal implementation.</p>	<p>Deputy Director, Administrative Services</p>	<p>DTSC will implement Fi\$Cal in July 2015. The Fi\$Cal implementation schedule has training commencing 3 months prior to going live (April 2015).</p>

### 3. Financial Assurance (FA) for Cleanup Sites

CONTROL WEAKNESS IDENTIFIED	CORRECTIVE ACTIONS TAKEN	STATUS
<p>Financial Assurance (FA) for Cleanup Sites (Work Plan 3b.) - The regulatory requirements and policies regarding financial assurance have changed over time and in some cases need updating. The Brownfields and Environmental Restoration Program is reviewing these requirements and policies and updating how it applies requirements to ensure public money is not used to pay for long-term cleanup projects where responsible parties file for bankruptcy or refuse to fund work.</p>	<p>Identify all sites where FA is currently in place.</p>	<p>A table identifying those sites where FA is currently in place has been created.</p>
	<p>Identify sites where cost estimates are not accurate or current.</p>	<p>A list of sites where cost estimates are not accurate or current has been prepared.</p>
	<p>Identify all sites that do not have FA but require it.</p>	<p>A table has been created which identifies sites that require FA. The table includes all proposed actions and identifies both revisions and new FA requirements.</p>
	<p>Prepare an Action Plan to implement new and revised FA programs.</p>	<p>An Action Plan has been completed with all FA information, including sites that are adequate, sites that require updates, sites that require new FA, and sites that require research. There are 185 cleanup and corrective action sites in the operation and maintenance (O&amp;M) phase that possibly need FA. Of these 185 sites, 80 had issues that need to be resolved. The majority of the issues were related to incomplete or erroneous entries into the EnviroStor database. These issues have been addressed as of the end of March 2014. Twenty-nine sites that are entering the O&amp;M phase have potential FA issues that are currently being resolved. The remaining 76 sites are in our active status category. Necessary FA will be determined and secured as the sites reach the appropriate cleanup/ correction action stages.</p>
	<p>Identify gaps in our current FA Policies, Regulations or Statutes.</p>	<p>Revised FA policies and procedures have been developed. The draft policy and issues paper is currently under review and will be completed in August 2014.</p>
	<p>("New") Train staff on FA and EnviroStor.</p>	<p>This is a new deliverable that was added as a modification to the original Work Plan deliverables. Initial guidance and training was completed in all regions in March 2014.</p>
	<p>("New") Complete efforts to update EnviroStor (database) for all sites needing FA.</p>	<p>Cleanups identified the need to improve EnviroStor capabilities and better populate it with complete data. Draft policies include requirements for the timely negotiation of O&amp;M agreements and securing of FA.</p>

**Financial Assurance (FA) for Cleanup Sites (Continued)**

CORRECTIVE ACTIONS TO BE TAKEN ONGOING MONITORING	PERSON RESPONSIBLE FOR ACTION (POSITION TITLE)	DATE OF ACTION/PLANNED ACTION
Implement Action Plan for new and revised FA programs.	Deputy Director, Brownfields and Environmental Restoration Program	The Action Plan will be revised to complete approximately 40% of the work by December 2014, 80% of the work by June 2015, and the remainder completed or in enforcement by December 2015.
Create a detailed Work Plan to implement any changes needed to FA policies, regulations and statutes.		Work Plan not needed. Program is developing new FA policy and procedure (P&P) to be completed by August, 2014.

#### 4. Institutional Controls Tracking

CONTROL WEAKNESS IDENTIFIED	CORRECTIVE ACTIONS TAKEN	STATUS
<p>Institutional Controls Tracking (Work Plan 3c.) - Final cleanup agreements often allow residual contamination to remain on-site requiring long-term stewardship (LTS). LTS refers to engineering and legal activities used to control and manage residual contamination. Risks to long-term stewardship activities include: outdated policies and procedures; no performance metrics tracking system; limited funding mechanisms to recoup clean-up costs; and the value added of the tracking system used to monitor planned activities on sites where LTS is in place.</p>	<p>Convene a small workgroup to discuss Terradex and provide recommendations to management.</p>	<p>Action complete.</p>
	<p>Terradex is a DTSC statewide contract that monitors over 125 data sources alerting DTSC project managers in advance of planned activities which could impact the integrity of LTS activities.</p>	<p>The following tasks were completed for this deliverable:</p> <ul style="list-style-type: none"> <li>• Defined management expectations related to maintaining Envirostor and the schedules that need to be included on the EnviroStor Activity Page. The Office of Environmental Information Management added a new performance metric called "Long Term Stewardship."</li> <li>• A Policy and Procedure for the implementation and management of Land Use Covenants has been drafted.</li> </ul>
	<p>Update and/or draft procedures relating to long term stewardship activities.</p>	<p>The DTSC Office of Legal Affairs provided recommendations for funding mechanisms for LTS activities. Funding mechanisms were memorialized as part of DTSC's Departmental Procedures Memorandums covering Cost Recovery and Land Use Covenants.</p>
	<p>Work with DTSC Office of Legal Affairs to identify recommendations for funding mechanisms for LTS activities.</p>	<p>Cleanup staff on the DTSC Envirostor Team updated the performance measurement report to include long-term stewardship activities.</p>
	<p>Work with Office of Environmental Information Management to establish performance metrics within EnviroStor:</p> <p>Implement as appropriate any recommendations outlined on the evaluations of Terradex or funding mechanisms.</p>	<p>Terradex activities will be directly billed to the owner/operators or responsible party of the facility/site.</p>

#### Institutional Controls Tracking (Continued)

CORRECTIVE ACTIONS TO BE TAKEN ONGOING MONITORING	PERSON RESPONSIBLE FOR ACTION (POSITION TITLE)	DATE OF ACTION/PLANNED ACTION
<p>Update the templates associated with land use covenants and operation and</p>	<p>Deputy Director, Brownfields and Environmental Restoration Program</p>	<p>Complete: Updating O&amp;M Agreement template – This task was given an initial due date of July 2013 but was completed in January</p>

maintenance agreements.		<p>2014 as it was done concurrently with Cost Recovery Department Procedures Memorandums.</p> <p>Reason for delay: Multi Work Plan activities, added scope and unplanned high priority tasks within the same time period. This Action Item coincided with work on Cost Recovery DPMs, DPM training set-up, AB 440 (Gatto, Chapter 588, Statutes of 2013), grant coordination, Defense State Memorandum of Agreement (DSMOA) coordination and Southern California project issues.</p> <p>Incomplete: These tasks remain to be completed; expected completion date is by August 1, 2014.</p> <ul style="list-style-type: none"> <li>• Template for Land Use Covenants (LUC) is being updated – drafted but not complete.</li> <li>• Management Memo associated with 5- year reviews is being developed and is undergoing internal review</li> </ul>
Finalize policies and procedures.		<p>Reason for delay: Policy and procedures for LUC drafted, going through internal review. Delay is due to Office of Legal Affairs workload. Management Memo associated with 5-year review delayed due to efforts needed to complete Cost Recovery DPMs, assist in DPM training set-up, AB 440 (Gatto, Chapter 588, Statutes of 2013) implementation, Grant coordination, DSMOA coordination and Southern California project issues.</p>
Conduct training on new policies and procedures.		<p>Reason for delay: The Brownfields and Environmental Restoration Program (Cleanups) undertook major policy creation and training efforts during the period covered by this Work Plan. The staff member specifically assigned to conduct training on Remedy Optimization was unexpectedly reassigned to the DTSC Office of Permitting. Training development is nearly complete and training classes will be presented through a 3-day series being offered at the Berkeley, Cypress, Cal Center and Chatsworth regional offices during the months of July, August, and September 2014.</p>
Update information on SharePoint and DTSC webpage.		<p>Reason for delay: Need to work with Office of Communications to draft updated fact sheets. Fact sheets will be uploaded to DTSC's website for public viewing. Expected completion date is September 2014.</p>

**5. Process Efficiency, Consistency and Transparency in the Hazardous Waste Facility Permitting Process**

CONTROL WEAKNESS IDENTIFIED	CORRECTIVE ACTIONS TAKEN	STATUS
<p>Process Efficiency, Consistency and Transparency in the Hazardous Waste Facility Permitting Process (Work Plan 4a.) - There is significant variability and complexity in the types of permits DTSC issues. Consistent practices and/or guidance for processing these permits is either not available or is outdated.</p>	<p>Initiate posting of key inspection &amp; enforcement documents on DTSC's website until a public side of Enforcement and Emergency Response Division's (EERD) EnviroStor database is completed.</p>	<p>Actions complete.</p>
	<p>Complete internal cross training of EERD staff on different types of facilities &amp; inspections, including hazardous waste landfills, refineries, used oil recyclers/handlers, transporters and metal recyclers.</p>	
	<p>Building upon lessons learned in the interim document website posting initiative established in April-June 2013, complete a user-friendly public side of EERD's EnviroStor system. We will coordinate with the Office of Environmental Information Management (OEIM) and our EnviroStor vendor, to provide data on inspection and enforcement activity, as well as online access to key inspection and enforcement documents.</p>	<p>Rollout of new Enforcement EnviroStor public website occurred April 1, 2014. The new website contains inspection data on permitted TSDs (Treatment, Storage, and Disposal facilities) including summaries of violations, inspection reports and enforcement summaries. The data goes back to 2009. New data will be added as it becomes available.</p>

**Process Efficiency, Consistency and Transparency in the Hazardous Waste Facility Permitting Process (Continued)**

CORRECTIVE ACTIONS TO BE TAKEN ONGOING MONITORING	PERSON RESPONSIBLE FOR ACTION (POSITION TITLE)	DATE OF ACTION/PLANNED ACTION
<p>Implement a process for issue resolution between Office of Permitting (OP) and Enforcement and Emergency Response Division (EERD) when permit language or conditions are unclear or viewed different by OP and EERD.</p>	<p>Branch Chief, Office of Permitting</p>	<p>Reason for delay: The Office of Permitting and Enforcement and Emergency Response groups undertook major training and policy development initiatives during the period covered by this Work Plan. Several high profile sites that required focused attention of staff and management. Vacant positions in staff and management also impeded progress. These positions are now filled.</p> <p>HWMP Internal Guidance Memo has been drafted and is being</p>

		<p>circulated for comment by HWMP management and senior staff. The memo addresses a number of issues to ensure coordinated, consistent and timely communication between the Office of Permitting and the Enforcement and Emergency Response Division. These issues include the sharing of inspection and permit review schedules and timeframes for comment and conflict resolution on draft permits. The process starts at the staff level and provides timeframes for elevating any disagreements to higher levels. Memo and process details will be finalized by August 31, 2014.</p>
Implement a pilot project to solicit public comment on proposed negotiated enforcement settlements.		Reason for delay: Unanticipated emergent workload and gaps in critical supervisory positions necessitated a rearrangement of priorities. Also, unexpected DTSC Office of Legal Affairs and Office of the Attorney General support requirements added to the time line.
Evaluate practicality and options for making fines/penalty calculation information public.		Pilot project to solicit public comment on proposed negotiated enforcement settlements will begin in August 2014. Evaluation of practicality and options for making fines/penalty calculation information public will be completed in August 2014.
Establish and implement procedures for timely review and comment on all draft permits regarding completeness and enforceability to the Office of Permitting.		Flowcharts and procedures reflecting the process will be finalized by August 31, 2014.
Provide all EERD staff with Annual Performance Appraisals and Individual Development Plans, and identify current and future training needs for EERD staff.		Training completed in May 2014. Performance Appraisals and Individual Development Plans will be complete by the end of July 2014.

## 6. Hazardous Waste Tracking System (HWTS) Data Base

CONTROL WEAKNESS IDENTIFIED	CORRECTIVE ACTIONS TAKEN	STATUS
<p>Hazardous Waste Tracking System Data Base (Work plan 4k.) - DTSC faces multiple risks in regulating California's hazardous waste, among them are: an aging Hazardous Waste Tracking System (HWTS), loss of staff resources dedicated to managing the hazardous waste processes and data, managing the conversion of growing quantities of raw data into information used to ensure the safety of Californians, inaccurate reporting of hazardous waste activities by transporters, and the looming implementation of a Federal HWTS that may or may not meet California's hazardous waste management needs.</p>	<p>Recruit and hire an Information Technology (IT) Project Manager for hazardous waste data management efforts.</p>	<p>IT Project Manager hired in March 2013.</p>
	<p>Obtain CA Technology Agency (CTA) approval of HWTS replacement Information Technology Concept Statement, as the first step in the project lifecycle and approval process.</p>	<p>June, 2013: CTA approved system upgrade. Federal e-manifest system will be treated as a separate project.</p>
	<p>Identify Federal e-manifest system impacts on HWTS and current business processes.</p>	<p>US EPA released its final federal rule in June 2014 and is required to have the national system in place by October 2015. Given the status of EPA's efforts, it is too early to determine whether and what impacts e-manifesting will have on the HWTS improvements.</p>
	<p>Prepare and submit a Feasibility Study Report (FSR) to DTSC and Agency for review and approval, as the second step in the project lifecycle and approval process.</p>	<p>First Draft of FSR submitted to CTA June 2013.</p>
	<p>Develop a Technology Governance structure between program and the Office of Environmental Information Management (OEIM) that would document and prioritize outstanding and future system/report improvements.</p>	<p>Governance Plan developed in June 2013.</p>
	<p>Submit FSR to CTA for approval.</p>	<p>FSR submitted to CTA in July 2013. In August 2013, CTA asked DTSC to revise and split into two FSRs. Updated FSR was submitted in August 2013. CTA required additional changes (removed \$220K in contingency funding) and lessons learned from DMV. Updated FSR was submitted to CTA in November 2013.</p>
	<p>Identify portions of HWTS not impacted by Federal e-manifesting system that will need to be replaced.</p>	<p>US EPA released its final federal rule in January 2014 and is required to have the national system in place by October 2015. Given the status of US EPA's efforts, it is too early to determine whether and what impacts e-manifesting will have on the HWTS improvements.</p>

	Expand and improve hazardous waste data grading, for better decision making.	Users requested the ability to limit search for faulty manifests by date range. Added this capability in October 2013.
	Improve HWTS data loading processes/procedures to increase system stability and maintainability.	The program that transfers the data from Operations to the Datamart aborted when the system tried to load duplicates. In October 2012, the program was recoded to improve stability of the data-load to prevent rejection during the loading of duplicates.
	Obtain FSR approval by CTA.	Approved in January 2014. A BCP was submitted, and an appropriation of \$1.2 million has been included in the 2014/15 Governor's Budget for implementation.

**Hazardous Waste Tracking System Data Base (Continued)**

<b>CORRECTIVE ACTIONS TO BE TAKEN ONGOING MONITORING</b>	<b>PERSON RESPONSIBLE FOR ACTION (POSITION TITLE)</b>	<b>DATE OF ACTION/PLANNED ACTION</b>
Develop HWTS project plan.	Division Chief, HWMP Policy and Program Support	Reason for delay: Due to pending BCP, project plan to be developed starting July 2014.
Modify/replace portions of HWTS not impacted by Federal e-manifesting system.		Reason for delay: It is premature to know whether, and what impacts, e-manifesting will have on the HWTS improvements. This will be reassessed as EPA's efforts progress.
Conduct User Acceptance Testing (UAT.)		Part of HWTS FSR/BCP - Implementing changes to HWTS will start in October 2014 and end in October 2015.
Implement HWTS changes.		