The Enforcement Improvement Plan details efforts to improve the efficiency, effectiveness, and transparency of the Department of Toxic Substances Control's Enforcement Program.

The mission of the Enforcement and Emergency Response Division is to protect human health and the environment through consistent and timely investigations, enforcement, and emergency response.
Executive Summary

The Department of Toxic Substances Control's (DTSC) Enforcement and Emergency Response Division (EERD), a division of the Hazardous Waste Management Program, is committed to promoting and supporting continual program evaluation and enhancements to ensure equitable, consistent, and timely enforcement; and enhancing public transparency and accessibility.

Improving the protectiveness, timeliness, and effectiveness of EERD is a continual process that requires implementing a quality management system to identify, measure, control, and improve all program processes.

The objective of this plan is to outline projects and associated milestones and timelines that EERD is developing and implementing to meet or exceed program objectives, including those identified in the 2015-16 Budget Change Proposal (BCP)-Improving Enforcement Performance.
Goals, Strategies, and Outcomes

The following is a summary of goals, strategies, and outcomes that EERD commits to addressing to meet or exceed the objectives identified in the 2015-16 BCP-Improving Enforcement Performance.

GOAL 1: Clearly define the inspection and enforcement process, and identify areas for streamlining and barriers to an efficient inspection and enforcement program.

FIRST STRATEGY TO ACHIEVE GOAL: Perform an extensive review of the inspection and enforcement process and identify areas for improvement.

ACHIEVEMENT:

✓ Completed a Lean Six Sigma (L6S) project on the administrative enforcement process in July 2016. A key outcome was a detailed mapping of the enforcement process. Recommendations for improvement were incorporated into program policies and procedures.
✓ Completed a L6S project on improving the inspection report process in July 2017. Implementation is underway and recommendations for improvement will be incorporated into program policies and procedures.
✓ Completed a L6S project on improving the administrative penalty assessment process in July 2017. Implementation is underway and recommendations for improvement will be incorporated into program policies and procedures.

SECOND STRATEGY TO ACHIEVE GOAL: Create a clear and detailed improvement plan.

ACHIEVEMENT: A detailed Enforcement Improvement Plan was developed in June 2016, identifying specific program improvement efforts, projects, and associated timelines for completion.

THIRD STRATEGY TO ACHIEVE GOAL: Identify barriers to process improvements that require regulatory or statutory changes and draft language to make those changes.

ACHIEVEMENT: The three L6S projects undertaken by ERRD identified barriers to process improvements. Recommendations for improvements, including regulatory and statutory changes will be evaluated and included in the Enforcement Improvement Plan.
OUTCOME: Establish detailed mapping of the inspection and enforcement process; reduce the time to complete inspection reports and enforcement activities; and improve program consistency and uniformity.

GOAL 2: Establish clear metrics to evaluate performance in inspection and enforcement activities.

FIRST STRATEGY TO ACHIEVE GOAL: Develop workload standards, tracking, and performance metric reports in EnviroStor to provide data to develop clear and consistent workload standards.

ACHIEVEMENT:
✓ Updated interim workload standards for all inspection and enforcement activities.
✓ Undertaking a one-year comprehensive evaluation of inspection activities to develop more detailed and updated workload standards for inspection activities.
✓ Completed numerous enhancements to EnviroStor.

SECOND STRATEGY TO ACHIEVE GOAL: Update EnviroStor documentation and training manuals to ensure long-term success of the system.

ACHIEVEMENT:
✓ Completed numerous updates to EnviroStor documentation and additional updates are underway.
✓ Currently drafting an EnviroStor Training Manual (completion target date December 2017).

OUTCOME: Improve program performance management of inspection and enforcement activities. Effectively prioritize work conducted to maximize resources to achieve or exceed all established performance measures, including those specified in L6S projects.

GOAL 3: Create a formal review process for enforcement case management.

FIRST STRATEGY TO ACHIEVE GOAL: Draft/update policies, procedures, and guidance documents.

ACHIEVEMENT: Three program policies were updated and approved in July 2016; five additional program policies were updated and approved in June 2017.
SECOND STRATEGY TO ACHIEVE GOAL: Identify technical guidance and training for staff to implement process improvements.

ACHIEVEMENT:

✓ Developed a comprehensive Inspector Training Program and provided to staff in March 2017.
✓ Developed and provided training on DTSC’s Supplemental Environmental Projects (SEP) Policy in March 2017.

THIRD STRATEGY TO ACHIEVE GOAL: Develop procedures or establish a workgroup to review enforcement cases for consistency and precision.

ACHIEVEMENT: Utilizing a workgroup comprised of legal and EERD staff and managers to review enforcement cases for consistency and precision.

OUTCOME: Increase program-wide consistency and effectiveness for all activities, including the review of enforcement cases.

GOAL 4: Clearly communicate the inspection and enforcement process to stakeholders and the community.

FIRST STRATEGY TO ACHIEVE GOAL: Evaluate and initiate enhancement efforts to the public EnviroStor website to improve program transparency.

ACHIEVEMENT:

✓ Numerous enhancements to the public EnviroStor are completed and more are underway.
✓ Held a public webinar in December 2016 to encourage public comments and recommendations to make the public website more user friendly.

OUTCOME: Timely and clear communication with the public and stakeholders.

GOAL 5: Incorporate community engagement in setting inspection and enforcement priorities.

FIRST STRATEGY TO ACHIEVE GOAL: Develop an effective communication strategy for engaging neighborhoods in close proximity to inspection and enforcement activities.

ACHIEVEMENT: Drafted a public engagement strategy to encourage community engagement in program activities.
SECOND STRATEGY TO ACHIEVE GOAL: Identify and develop analytical tools to prioritize DTSC’s enforcement efforts.

ACHIEVEMENT: Utilizing CalEnviroScreen and the new Online Complaint System to prioritize enforcement activities.

OUTCOME: Continual community engagement in inspection and enforcement activities.
Background

In addition to the five goals identified in the 2015-16 BCP-Improving Enforcement Performance, DTSC’s 2014-2018 Strategic Plan identified the following specific objectives for improving its Enforcement Program:

Objective 2.3: Improve effectiveness, efficiency, and consistency in enforcing California’s hazardous waste laws; and make DTSC’s enforcement program’s information and processes more accessible to the public.

Objective 2.4: Improve public confidence in DTSC’s enforcement decisions by establishing clear guidelines for decision points that ensure enforcement actions result in timely resolution with appropriate penalties and corrective actions.

Objective 2.5: Develop and apply criteria and processes to prioritize work within the hazardous waste enforcement and permitting programs, including the use of tools such as new environmental screening methods and Geographic Information System technology.

Objective 2.9: Using a cross-sectional workgroup, assess, report on, and implement initiatives to increase collaborative enforcement efforts between DTSC’s EERD, Office of Criminal Investigations (OCI), California Unified Program Agency (CUPA), United States Environmental Protection Agency (U.S. EPA), local prosecutors, and other enforcement agencies.

DTSC’s Fixing the Foundation Work Plan also includes the following components related to enforcement:

4(a): Improve the efficiency and consistency in enforcing state hazardous waste laws and make the enforcement program’s information and processes more accessible to the public.

4(c): Establish clear guidelines on key decision points within the enforcement process to ensure enforcement actions result in timely settlement with appropriate penalties and corrective actions.

4(e): Establish clear priorities for the enforcement program.
Program Improvements

In September 2015, the Enforcement Program held a scoping meeting to conduct a baseline assessment of legal mandates and authorities, inspection types and frequencies, enforcement actions, coordination efforts, environmental justice challenges and opportunities, data management needs, performance metrics, and potential regulatory actions needed.

In July 2016, the Enforcement Performance Management Branch held a cross-program workshop with staff from the legal office, public participation, environmental justice and tribal affairs, and EERD Branch Chiefs to identify guiding principles for EERD. These guiding principles include:

1. Improve program efficiency and effectiveness while maintaining quality.
2. Develop and utilize tools and pathways that support and sustain a robust enforcement program.
3. Promote and support continuous program improvement.
4. Establish and use clear and meaningful metrics that are representative of EERD’s work, and provide a means for effective performance management.
5. Implement and maintain a data management system that ensures that the type, quantity, and quality of data produced supports program objectives.
6. Communicate, coordinate, and collaborate consistently with internal and external agencies.
7. Develop and update guidelines to ensure program uniformity and transparency.
8. Promote community education and engagement in program activities.

Program improvements are underway in seven specific areas: Environmental Justice; Communication; Analysis and Transparency; Efficiency; Consistency and Rigor; Sector-based Enforcement; and Data Management. Progress in each of these areas is summarized below.

Environmental Justice

In cooperation with DTSC’s newly established Office of Environmental Justice and Tribal Affairs, Enforcement Program staff is conducting a comprehensive evaluation of the Enforcement Program to identify gaps and develop strategies to more effectively address compliance challenges in impacted communities. This iterative effort relies on community engagement to provide a richer understanding of the ways in which non-compliance with
environmental requirements affects communities. The gap analysis is underway and DTSC is already taking steps to improve its enforcement program and compliance by regulated entities in impacted communities. Examples include:

1. DTSC is using CalEnviroScreen to identify impacted communities and prioritize inspection and investigation efforts in those areas. In Fiscal Year (FY) 2015-16, EERD began enhanced inspections of hazardous waste transporters in communities identified by CalEnviroScreen as disadvantaged and impacted by multiple sources of pollution. DTSC’s OCI began an investigation of the metal recycling sector, which is also primarily located in impacted communities.

2. In 2008, DTSC established the first Expanded Identifying Violations Affecting Neighborhoods (IVAN) program through a SEP to provide extensive support for community based enforcement. In 2015-16, DTSC expanded the IVAN network to the Bayview Hunters Point neighborhood in the San Francisco Bay Area and is partnering with a community-based organization in Sacramento to develop an IVAN network in the Capital region.

3. DTSC actively participates in the California Environmental Protection Agency (CalEPA) Environmental Justice Compliance and Enforcement Working Group. In 2013, DTSC participated in the Working Group’s first multi-media enforcement initiative in Fresno. In FY 2015-16, DTSC participated in multi-media initiatives in Boyle Heights and Pacoima. Staff provided three California Compliance School classes for local businesses, including one in Spanish, conducted 23 inspections, and prepared four formal enforcement actions.

4. In FY 2015-16, DTSC signed a new SEP Policy. This policy demonstrates DTSC’s commitment to environmental justice by encouraging projects in communities most impacted by environmental harm. The policy provides the option to allocate up to 50% of penalties to a SEP with priority in impacted communities where violations occur. It is one of the first SEP policies in the nation to identify Native American tribes as eligible recipients of SEPs.

**Communication**

DTSC recognizes that a robust Enforcement Program requires effective and timely internal and external communication. DTSC is taking steps to ensure that Enforcement Program staff communicates, coordinates, and collaborates consistently with colleagues in the Hazardous Waste Management Program, in other program areas within DTSC, with co-regulators, regulated businesses, and the public we serve.
**Internal Communication:**

1. Established liaisons to support timely, clear, and effective communication between Enforcement staff in the Headquarters Office and staff in each Regional Office.

2. Established an Enforcement and Permitting liaison.

3. Established an Enforcement Performance Management SharePoint site to share information.

4. Produce a monthly EERD Newsletter to disseminate program information.

**External Communication:**

1. In FY 2015-16, DTSC helped roll out the new online CalEPA Environmental Complaint System. This tool allows Californians to report an environmental problem anywhere in the state and provides environmental agencies with valuable information about potential environmental hazards and violations. Once a complaint is filed, it is routed to appropriate state or local agencies. DTSC participates in the review and routing of complaints.

2. In FY 2015-16, DTSC offered three California Compliance School classes for businesses in the communities where the businesses are located, including one in Spanish.

3. DTSC completed a comprehensive effort to modernize its approach to public participation, including understanding community needs and developing an effective outreach and engagement work plan; early and continuous public engagement; a customized approach for communicating with community members and stakeholders; and increased access to data and information relevant to decision-making using social media, electronic platforms, and community networks and community based groups. The effort to encourage communication was undertaken with contractors from the University California Davis and is built on extensive engagement with DTSC stakeholders. The strategies developed through this effort will be built into and tailored to the Enforcement Program.

4. EERD is coordinating with Public Participation and Community Relations staff in DTSC’s Office of Communications to establish the framework to promote community education and engagement specifically for Enforcement Program activities. DTSC is also actively supporting expansion of the IVAN network.

5. EERD held a public webinar in 12/2016 for public EnviroStor. The public was provided an opportunity to provide comments and recommendations on the type of information that they are interested in viewing to make the public website more user friendly.
6. EERD is currently developing a public engagement and education strategy specific to the work conducted by the Enforcement Program.

Analysis and Transparency

DTSC is taking concrete steps to develop analytics and metrics to better characterize work done by DTSC and to make that information available to the public. Examples of this include:

1. Making inspection and enforcement data available online. In 2014, information was added to DTSC’s website and EnviroStor to provide access to inspection data and reports for permitted facilities, Summaries of Violation (SOVs), and enforcement settlements. Further enhancements are currently under development to provide inspection and enforcement performance metrics online. When the compliance analytics methodology is final, DTSC will also provide compliance outcomes online.

2. In FY 2015-16, DTSC implemented a pilot project to provide public comment on draft settlement agreements. Facility participation was voluntary because the regulations do not require public comment. Facilities chose not to participate. As a result, DTSC is evaluating options for requiring public comment on draft settlement agreements, including, for example, when a sector or facility has poor compliance history or a low compliance index as compared to other sectors or facilities. Mandatory public comment would likely require regulatory changes.

Efficiency and Effectiveness

DTSC has successfully implemented structured analyses of program elements using L6S methods to increase efficiency and eliminate waste in its processes. In addition to improving processes, L6S evaluations also yield measurable performance metrics and fact-based performance goals.

1. L6S on Case Referral – The analysis phase of this project was completed in the summer of 2015 and provided a baseline analysis of OCI case management and backlog of unresolved cases. The project established a goal for OCI to refer 95% of cases within 180 days. Implementation began in January 2016. OCI developed case management policies and a tracking and report function in EnviroStor.

2. L6S on Administrative Enforcement Cases – The analysis phase of this project began in February 2016 and was completed at the end of July 2016. A key outcome was a detailed mapping of the enforcement process. EERD evaluated data produced by this project and determined that two addition L6S projects were needed to further streamline the Inspection Report and Penalty Assessment Phases to reduce the time to complete administrative enforcement actions.
3. L6S on Inspection Report Process – EERD initiated this project to define the inspection report process and identify areas for improving the timeliness and quality of inspection reports. The project was initiated in February 2017 and the analysis phase was completed in July 2017. Implementation is underway.

4. L6S on Penalty Assessment – To establish consistency, EERD requires all penalty calculations to be reviewed by a multi-disciplinary Penalty Work Group. In February 2017, EERD initiated a L6S project on the penalty assessment process to further improve the efficiency and effectiveness of the penalty assessment phase. The analysis phase was completed in July 2017. Implementation is underway.

Consistency and Rigor

DTSC is developing and updating regulations, policies, and guidelines to ensure its enforcement program is as consistent and effective as possible with available resources. Examples include:

1. Violation Scoring Procedure – DTSC is developing regulations that will create a transparent and accountable approach, using objective criteria, to evaluate a facility’s compliance history. The evaluation will inform permitting decisions, including the degree of non-compliance that can lead to revocation of a permit or denial of a permit application. The Violation Scoring Procedure will ultimately be embodied in regulations that will apply to operating permitted treatment, storage, and disposal facilities.


10. Develop a Data Management Policy – Completion target date is December 2017.

11. Develop Departmental Procedural Memorandums that establish “Roles and Responsibilities” for EERD and other DTSC programs – Completion target date is December 2017.

Sector-based Enforcement

1. Metal Recyclers – DTSC developed this initiative in response to stakeholder concerns, as well as EERD experience in the Fresno Environmental Justice Enforcement Initiative regarding the metal recycling industry’s compliance with environmental laws. OCI conducted 12 inspections in FY 2015-16 and plans to complete 30 inspections by the end of June 2017. The metal recycling facilities selected for inspection are located in communities with high cumulative environmental impacts. The anticipated outcome of these inspections is higher compliance rates, reduction of environmental impacts to communities, and development of compliance tools and strategies for this industry.

2. Mercury Thermostats – The Mercury Thermostat Collection Act of 2008 required DTSC to adopt regulations in 2013 that establish annual performance goals for the collection of mercury containing thermostats. The goal of the Act and regulations is to keep mercury containing thermostats out of the solid waste stream. An annual report for most of the manufacturers is filed annually. The 2013 and 2014 reports showed that thermostat manufacturers failed to meet the annual performance goals. The manufacturers were notified of the violations and a settlement was reached with most of the manufacturers with payment of a penalty for the 2013 and 2014 reporting periods. The 2015 report was submitted and manufacturers continue to fall short of the annual performance goal.

3. Transporters – Two additional inspection staff were added in July 2015 to perform additional transporter inspections. Through review of manifest data in FY 2015-16, EERD identified transporter storage limit compliance issues among asbestos removal contractors. EERD plans to focus a portion of the scheduled transporter inspections in FY 2016-17 on asbestos waste transporters and increase outreach and compliance education opportunities in that industry.

4. Treated Wood Waste (TWW) – Four additional inspection staff were added in March and April 2017 to perform inspections of TWW generators and disposal facilities to assess compliance with requirements. A report containing findings and recommendations is due to the legislature by June 2018.
5. Future Sector Focus – DTSC uses CalEnviroScreen to help prioritize complaint response and will continue to expand use of this tool to identify future sectors for focused compliance efforts. In addition, DTSC will coordinate with organizations like the CUPA Forum, the California Air Pollution Control Officers Association, and the California District Attorneys Association to identify common issues and concerns with industry sectors. DTSC is also exploring the use of other sources of data (compliance analytics, California Environmental Reporting System (CERS), biomonitoring, and others) to help identify focus areas by industry and geography for inspection and enforcement activities.

Data Management

EERD is focused on achieving the following to help ensure that the type, quantity, and quality of data produced meets or exceed program objectives:

1. Implement a data driven approach to prioritize enforcement efforts – Full utilization of available databases such as EnviroStor, Hazardous Waste Tracking System, CERS, and EPA’s Enforcement and Compliance History Online.

2. Employ rigorous quality assurance/quality control (QA/QC) procedures, including multi-level reviews.

3. Establish clear and meaningful metrics that adequately represent EERD’s work and provide a means for effective performance management, and develop data tracking and reporting to support optimum program performance.

4. Better utilize technology and software platforms (such as tablets and field – support software) to improve inspection data capture and report generation.

In FY 2015-16, Enforcement Program staff worked with DTSC’s Office of Environmental Information Management to add tracking capability to EnviroStor for specific code sections for violations found. Additional programming for EnviroStor enhancements is currently underway.

EnviroStor Enhancements Completed as of March 2017:

1. EnviroStor Facility Record – Ability to enter a facility without an EPA Identification Number.

2. Inspection/Enforcement Permitted Sites for Public – Permitted facilities with inspection or enforcement activities made available on the public website.
3. Groundwater Audit Report (GAR) – Added a new focus inspection type to capture GAR inspections.

4. Inactive Site Inspections – Corrected an error to allow transfer of records to RCRAInfo.

5. Site Code – Site codes are generated and tied to the facility record for inspection and enforcement activities.

6. EnviroStor Project Tracking Tool for Data Systems Unit – Tracking capabilities for programs enhancements and improvements. Data Managers can assess current and completed work.

7. Contact Section – Ability to add facility contact information, which must be filled out for a new facility to receive a site code or enforcement site code.


9. ISI Column – Added capability to easily identify the number of inspections not completed due to a company ceasing business.

EnviroStor Enhancements Scheduled for FY 2016-2017:

1. Enforcement Activities Report – Any scheduled enforcement activity (will capture records created for a docket number).

2. Enforcement Actions Report – Cases not settled.

3. EPA Violations Report – Identify the EPA Identification Number, facility, class and type of violation, scheduled and actual return to compliance, and the qualifier code.

4. QA/QC Violations Report – Similar information to the EPA Violations Report, however, includes the fields that are uploaded to RCRAInfo.

5. Expand Area of Violations – For newly entered violations, ability to include violations other than those found in the Code of Federal Regulations.

6. Project Management/Tracking – Add fields with due dates for project management of inspection and enforcement activities.
   - Activities will be available in a project summary under “Inspection / Enforcement Activities”.
   - Next to the locked down due dates, add actual completion date to assess project timeliness.
   - Gantt chart

8. CalEnviroScreen Environmental Justice – Incorporate the CalEnviroScreen Score into the EnviroStor Facility Screen and the New Violations Report. This will provide a list of facilities within the top percentile and types of violations cited.

9. Data Export Tool – Allows users to custom build reports for specific data requests.

10. SOV and Inspection Report Amendments – Add capability.

11. Days to Enforcement Action – Add to enforcement activities in the EPA Enforcement Report.


Update EnviroStor documentation and training manuals to ensure long-term success of the system:

1. QA/QC Quick Guide Sheet (completed) – Utilized by data managers to QA/QC data on a daily, weekly, and monthly basis.

   - Data Managers are reviewing numerous reports for data accuracy and possible enhancements i.e., searching capabilities, export, etc.
   - A section of the guidance manual will have screen shots that identify common errors found in EnviroStor records. (screen shots completed)
   - Twenty-eight sections are currently under review. Once approved they will be provided to the Data Systems Unit to convert to a guide tutorial under the “Help” section.

3. EnviroStor Team Meetings
   - Continuous training for data managers on the use of EnviroStor.
   - Monthly program data meetings to discuss any data entry issues as well as consistency in reporting.
   - Monthly EnviroStor team meetings with Data Systems Unit to discuss changes and enhancements to EnviroStor.
Enhancement efforts to the public EnviroStor website to improve program transparency:

1. Guidance for Uploading Documents – Developing guidance for uploading documents to EnviroStor and “Roles and Responsibilities” for data managers, staff, and supervisors to ensure data is uploaded correctly and in a timely manner, and does not contain confidential information.

2. Uploading Past Inspection/Enforcement Documents – Upload documents from 2010 to present.

3. Public Website Redesign – Create a single facility page to merge facility, enforcement, and corrective action information for treatment, storage, and disposal facilities. Restructure the layout of existing site/facility data.

4. Public Webinar for EnviroStor – In December 2016, DTSC gave a presentation and live demonstration on the public EnviroStor website. The public provided comments and recommendations on the type of information that they are interested in viewing to make the website more user friendly.
## Performance Goals and Outcomes Summary

<table>
<thead>
<tr>
<th>Improving Enforcement Performance Goals (Per 2015-16 BCP)</th>
<th>Completed Projects</th>
<th>Current Projects and Target Completion Dates</th>
</tr>
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</table>
| 1. Clearly define the inspection and enforcement process. Identify areas for streamlining and barriers to an efficient inspection and enforcement program: | 1. Conducted two program scoping meetings to identify areas for improvement (2015 and 2016)  
2. Completed Enforcement Lean Six Sigma Project (L6S); recommendations implemented into policies and procedures (7/2016)  
3. Implement/control Penalty Assessment L6S (7/2017) |
| - Perform an extensive review of the inspection and enforcement process and identify areas for improvement | Improve Internal Communication  
1. Established headquarters and regional office liaison structure (4/2016)  
2. Established an Enforcement and Permitting Liaison (5/2016)  
3. Produce a monthly Newsletter (11/2016)  
4. Developed SharePoint site  
5. Provide ongoing technical support to Division Chief and seven regional offices | |
| - Create a clear and detailed improvement plan | 1. Developed an Enforcement Improvement Plan (7/2016) | |
| - Identify barriers to process improvement that require regulatory or statutory changes and draft language to make those changes | 1. Evaluated regulations to determine changes and updates needed (12/2016)  
2. Assist with research and development of Violation Scoring Regulations (ongoing)  
3. Provided Environmental Laboratory Accreditation Program input on proposed regulations (2/2017) | 1. Draft updated penalty regulations (12/2017) |
## Performance Goals and Outcomes Summary

### Improving Enforcement Performance Goals (Per 2015-16 BCP)

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<tr>
<td>2. Establish clear metrics to evaluate performance in inspection and enforcement activities:</td>
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</table>
| ➢ Develop workload standards, tracking, and performance metric reports in EnviroStor to provide data to develop clear and consistent workload standards | 1. Developed workload standard tracking sheet for inspection activities (10/2016)  
2. Developed a database for workload standard data project (7/2017)  
2. Update inspection workload standards (12/2017)  
3. Conduct an evaluation of current metrics and recommend changes/updates (6/2018) |
| ➢ Update EnviroStor system documentation and training manuals to ensure long-term success of the system | 1. Completed numerous updates and improvements to EnviroStor | 1. Developing training manual for EnviroStor (12/2017)  
2. Numerous improvements to EnviroStor scheduled |
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<td>3. Create a formal review process for enforcement case management:</td>
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<td></td>
<td>2. Updated Referrals to California Compliance School Policy (7/2016)</td>
<td>2. Update numerous procedures, checklists, and guidance documents (12/2017 and ongoing)</td>
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<tr>
<td></td>
<td>3. Updated Sharing Administrative Penalty Calculation Information Policy (7/2016)</td>
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<td>5. Updated Conducting Inspections Policy (6/2017)</td>
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<td>7. Updated Collecting Overdue Administrative Penalties Policy (6/2017)</td>
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<td>9. Updated Briefing Book for EERD (9/2016)</td>
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<tr>
<td>- Identify technical guidance and training for staff to implement process improvements</td>
<td>1. Developed new employee orientation training (10/2016)</td>
<td>1. Implement and manage Inspector Training Program (ongoing)</td>
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<td>- Develop procedures or establish a workgroup to review enforcement cases for consistency and precision</td>
<td>1. Participate in monthly Penalty Work Group meetings</td>
<td>1. Implement/control Penalty Assessment L6S (7/2017)</td>
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<td>4. Clearly communicate the inspection and enforcement process to stakeholders and the community:</td>
<td>1. Held public webinar for public EnviroStor. The public provided comments and recommendations to make the public website more user friendly (12/2016)</td>
<td>1. Evaluating numerous enhancements made and additional ones needed to EnviroStor (ongoing)</td>
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<td>➢ Evaluate and initiate enhancement efforts to the public EnviroStor website to improve program transparency on DTSC’s enforcement efforts</td>
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<td>5. Incorporate community engagement in setting inspection and enforcement priorities:</td>
<td>1. Conduct public outreach to identify interests and concerns (ongoing)</td>
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<td>➢ Identify and develop analytical tools to prioritize DTSC’s enforcement efforts</td>
<td>1. Utilize CalEnviroScreen to prioritize enforcement efforts 2. Utilize the new Online Complaint System (6/2016)</td>
<td>1. Continue to identify and develop analytical tools to better prioritize enforcement efforts (ongoing)</td>
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