



Lean Event Dates: January 25-29, 2010

**Project:** Underground Storage Tank Notice of Violation Tracking  
**Bureau:** Materials Management and Compliance Assistance

**Team: Total number of team members = 9 (6 staff within Division / 3 staff outside Division)**

**Team Sponsor(s)/Title(s):** Mark DeCaprio, Division Director/BMMCA

**Team Leader(s)/Title(s):** Helen Robbins, Sanitary Engineer 3/BMMCA

**Team Members /Titles:** Philip Wilde, Environmental Analyst 2/BMMCA; David Keating, Sanitary Engineer 2/BMMCA; Seng Phouthakoun, Air Pollution Control Engineer 2/BAM; Kelly McShea, EA 1/BMMCA; Bill Strubbe, IT Analyst 2/OIM; David Holmes, DP Tech Analyst 4/OIM

**Team Champion(s)/Title(s):** Peter Zack, Assistant Director/BMMCA

**Opportunity Statement:** As a result of the UST Inspection Process LEAN event, the Storage Tank Enforcement Program has recently begun to generate 300 - 400 Notices of Violation (NOVs) per year. There are currently 140 NOV cases that are unresolved. There are opportunities to avoid an increasing backlog, to decrease the time and steps it takes from NOV issuance to NOV closure in SIMS and to evaluate options for escalating the NOV enforcement action to increase compliance rates and timeliness.

These opportunities include: enhancing the current compliance tracking system; improving descriptions of violations and instructions given to the regulated community when the NOV is issued; establishing reminder/follow up notices, standardizing compliance documentation submission (one email, phone and fax number), streamlining internal procedures and ensuring related programs receive required documentation and data. There is also the opportunity to make this entire process electronic from the NOV issuance in the field being synced into ESRUST (the UST database) and accepting compliance documentation via e-mail and filing it electronically.

**Objective:** To make UST NOV Compliance and Tracking as efficient as possible and to use compliance assistance proactively to reduce the number of violations, hence the number of NOVs issued.

<b>Goals/Key Performance Indicators:</b>	
<b>Pre-Kaizen Event Goals – Date: 1/28/11</b>	<b>Post-Kaizen Event Results/Key Performance Indicators – Status Date: 9/9/2011</b>
Goal - NOV Issuance Rate vs. Closure Rate with the closure rate being 75 % of the issuance rate	work still in progress and will continue to be tracked as part of the program's performance
Goal - NOV Closure Rate of 70% within 45 days of issuance	work still in progress and will continue to be tracked as part of the program's performance
Goal - NOV Backlog Reduction of 50% within 6 months	work still in progress and will continue to be tracked as part of the program's performance

**Spaghetti Diagram showing distance traveled for the process under review during the *Pre-Kaizen phase:* *Post- Kaizen phase:***

**Comments:**

<b>Value Stream Mapping: The activities and steps, both value and non-value added, as shown in the Pre-Kaizen state versus Post-Kaizen desired state.</b>		
<b>Type of Process</b>	<b>Pre-Kaizen – # of Processes</b>	<b>Post-Kaizen – # of Processes</b>
Valued Added	4	
No Value Added but Necessary	55	
No Value Added	21	
Waiting	10	
Transport	8	
Total	98	
<b>Percent Reduction in the Number of Total Steps =</b>		<b>% Reduction</b>



**The Post-Kaizen desired state has resulted in a number of improved program efficiencies and include the following:**

- We have not implemented all of our improvements yet so we don't yet know our Post-Kaizen future state.

**Highlights and Implementation of the Project Plan (2, 6 and 12 month deadlines):**

**Two Month Goals** - A centralized phone number and e-mail were established for the UST NOV Compliance Office and also a physical area was established for collection of compliance documentation. Information Technology requests were prioritized and submitted to the Office of Information Management (OIM). Approval was received to maintain electronic copies of Inspection Reports and NOV's instead of paper copies in the fileroom. Reports were created with assistance from OIM for monthly NOV status charts to measure KPIs. Delegation of Authority was granted to issue Field NOV's.

**Six Month Goals** - The UST NOV status letters were reviewed and modified, and are now awaiting management approval. The language in the brochure to assist owners and/or operators with compliance was approved by the Office of Planning and Program Development, Enforcement Policy. Once the final touches are made, the brochure will be routed through management and the Permit Assistance and Environmental Review for final approval. A contract for three sessions of inspector training with an outside vendor was signed and the second session takes place September 13-15, 2011. Improvement and enhancements continue to be made to both ESRUST (the UST database) and also the UST sections of SIMS to better track NOV compliance. Modifications to the website have been proposed listing the most common violations and the corresponding corrective actions. Six to twelve month goals are to complete modifications to UST NOV language, status letters, and website; distribute brochure when NOV's are issued, and continue to refine SOP for NOV Compliance Tracking.

**Twelve Month Goals** - These goals include final approvals for status letters, the assistance brochure, the modified language in the UST NOV's and the website enhancements. With final approval, these enhancements will be implemented to improve the KPIs for compliance rates and timeliness for UST NOV Closures. All three sessions of the Inspector Training will be completed as a twelve month goal. Review KPIs including closure rates and compliance rates to see improvements to Pre-Kaizen rates.

**Additional Comments/Observations/WOWS/Innovations from the Team:** A major WOW for this project is the reduction in paper copies being filed in the file room with the electronic capabilities of NOV's and Inspections Reports being available for the public via the computers of file room staff. OIM is still working on the possibility of ESRUST, the UST database with NOV's and Inspection Reports being available on the file room laptops for the public. There is the ability to create FOIA reports from data extracted from ESRUST. This electronic system is meeting the Commissioner's paperless goals for the Department.

As requested, KPIs will continue to be tracked for this project. 1) The Rate of NOVs Issued versus the Rate of NOVs Closed on a monthly timeline is being tracked. As the backlog becomes smaller these rates will hopefully become more similar. 2) Also, the NOV Closure Rate within 45 Days is being tracked with a goal of 70% of NOVs closed within 45 days. This includes NOV closure through compliance, revoked or withdrawn, administratively closed, and no further action. 3) The third KPI being tracked is closure of backlogged NOVs. The current rates do not show significant improvement yet because many of the enhancements to the process have not been implemented yet as they are still being finalized.

As this Lean project progressed, we realized the opportunity to use outreach and compliance assistance to reduce the number of NOVs issued. We incorporated this opportunity into our project.

**Revision Date:** 9/9/2011