

# Proposed Hazardous Waste Management Program Metrics Workshop





Board of Environmental Safety Metrics Subcommittee January 2025



#### **BES Metrics Subcommittee**

Sushma Bhatia, Board Member

Ingrid Brostrom, Board Member

Swati Sharma, Executive Officer

Linda Ocampo, Sr. Staff Engineer

#### **Focus and Board Role**

**Focus**: Identify and report program metrics that help BES, stakeholders, and community members understand program effectiveness.

**Board Role:** The Metrics Subcommittee is responsible for shaping and evaluating metrics that are of interest to stakeholders, through the assessment of existing metrics and a stakeholder engagement process to solicit input.

The Subcommittee has kicked off this work with the Hazardous Waste Management Program.

Metrics evaluation for the Safer Consumer Products program will be conducted in Spring 2025.

#### **HWMP Metrics Evaluation**

#### Approach:

- Since April 2024, the Subcommittee has engaged with DTSC HWMP to:
  - Evaluate HWMP metrics in DTSC's Strategic Plan Dashboard
  - Review internal metrics tracked by HWMP Divisions
  - Analyze the intent of the metric
  - Suggest ways to meet the intent with different metrics
- Board vote to consider proposed metrics at the March 2025 Board Meeting

# **Hazardous Waste Management Program (HWMP)**

#### **HWMP Divisions:**

- Permitting
- Enforcement and Emergency Response (EERD)
- Office of Criminal Investigations (OCI)
- Policy & Program Support Branch

# **HWMP Metrics Engagement**

#### **Department**

- Craig Scholer (Chief Deputy Director)
- Grant Hisao (Chief of Staff)

#### **Permitting Division**

- Wayne Lorentzen (Division Chief)
- Lori Koch (Branch Chief)

#### **EERD Division**

- Maria Soria (Division Chief)
- April Ranney (Enforcement, Supervisor)
- Dylan Clark (OCI Supervisor)

# Proposed HWMP Metrics

Presenters: Board Members Sushma Bhatia and Ingrid Brostrom

## 1) Permit Backlog Progress

**Division: Permitting** 

Intent: To report on DTSC's progress in reducing overdue permits.

#### **Context:**

- DTSC has prioritized completing overdue permit decisions. Although some applications may have issues that take more time to resolve, DTSC strives to make timely, protective, and legally defensible permit decisions.
- In this context, "overdue" means more than 1 year past the expiration date.

#### **Metrics to Report:**

Number of overdue permits remaining per fiscal year.

# 2) Permit Renewal Processing for Permits Expiring on/after January 1, 2025

**Division: Permitting** 

**Intent**: To assess the effectiveness of the permit renewal process at preventing overdue permits.

#### **Context:**

- SB158 mandate (HSC 25200) instituted permit decision timelines to ensure that permit holders operate on up-to-date permits.
  - DTSC Permitting must issue a decision on the permit renewal application no later than 1 year after end of permit term.

# 2) Permit Renewal Processing for Permits Expiring on/after January 1, 2025

**Division: Permitting** 

#### Context (cont'd)

• The metric monitors the number of permit decisions made within the statutory timelines. The data will provide insight into permits most at risk of becoming overdue, and tracks delays caused by the Department.

#### **Metrics to Report:**

Number of final permit decisions made within 1 year of permit term expiration compared total final permit decisions in fiscal year.

# 3) Number of Permit Application Reviews Completed within 140 Days

# **Division: Permitting**

**Intent:** To gauge the ability of the permitting program to complete permit application reviews and publish decisions in a timely manner.

#### **Context:**

- Once renewal permit applications are submitted, DTSC conducts administrative and technical reviews before issuing draft and final permit decisions.
- DTSC's internal Six Sigma evaluations of the permitting process have shown that technical reviews completed within 140 days lead to timely permit decisions.

#### **Metrics to Report:**

 Number of technical permit application reviews completed within 140 days after a complete application is received.

# 4) Supplemental Environmental Projects (SEPs)

**Division: EERD / OCI** 

**Intent**: Gain insight on the number of SEP applications and trend in the use of SEPs over time.

#### **Context:**

- SEPs increase opportunities for funding for tangible community benefit projects in vulnerable communities.
- Information will provide insight regarding (a) whether community outreach is needed to increase the number of SEP applications and (b) whether facility owners are supporting the funding of SEPs when available.

# 4) Supplemental Environmental Projects

**Division: EERD / OCI** 

#### **Metrics to Report:**

- 1. Number of projects eligible for Supplemental Environmental Projects annually.
- 2. Number of applications received and evaluated for SEP eligibility annually.
- 3. Number and total dollar amount of SEPs funded as part of the resolution of administrative and civil cases annually.

# 5) Compliance Rates for Violations Issued

**Division: EERD** 

#### Intent:

- Gain a thorough understanding of compliance across different violation classes, issued to permitted and non-permitted facilities, in vulnerable and non-vulnerable communities.
- Assess violation data in vulnerable communities to understand what, if any, differences exist in the effectiveness of enforcement activity in vulnerable communities.

## 5) Compliance Rates for Violations Issued

**Division: EERD** 

#### **Context:**

- The Return to Compliance Rate is the number of violations corrected to total violations issued.
- Three types of violations are issued Class 1, Class 2, and Minor. Class 1 are the most serious types of violations that may pose a significant threat to human health or the environment.
- The return to compliance rate for each violation type indicates the effectiveness of inspection activities in improving compliance.

## 5) Compliance Rates for Violations Issued

**Division: EERD** 

#### **Metrics to Report:**

- Baseline number of violations by class that distinguishes violations
  issued to permitted or non-permitted facilities, and whether the facilities
  are in vulnerable or non-vulnerable communities.
- 2. Quarterly percent of return to compliance for each violation class.
- 3. Year to year analysis of return to compliance for each violation class.

## **Next Steps**

- February March 2025: Solicit public input and refine metrics
- March 19, 2025: Board vote to consider proposed metrics at Board Meeting
- April 2025: Kickoff Safer Consumer Products metrics evaluation

#### **Submit Public Feedback**

- To submit written feedback, please submit your comments to linda.ocampo@bes.dtsc.ca.gov
- To set up meetings with the subcommittee, please reach out to BES Public Outreach Manager, Sheena Brooks at <a href="mailto:sheena.brooks@bes.dtsc.ca.gov">sheena.brooks@bes.dtsc.ca.gov</a>