Streamline Stationary Source Inspection Report Preparation

The Service
The DES Air Resources Division is responsible for administering the provisions of the federal Clean Air Act at the State level. As such, “stationary sources” must obtain a permit through the division. These permits describe the type and amount of air emissions’ which dictate the facilities’ permit conditions. Compliance is audited on a regular basis via inspections. ARD follows the EPA guidance document “Clean Air Act Stationary Source Compliance Monitoring Strategy September 2010” for the preparation of its own compliance monitoring strategy.

The Problem
Writing an inspection report requires a significant expenditure of time by numerous staff; this includes multiple layers of review to ensure accuracy of the technical data, eliminate writing errors, and ensure adherence to Division writing guidelines. The inspector prepares a draft report using the report template, modifying it to reflect source specific conditions. A permit engineer and the Compliance Assessment Section Supervisor review the draft report for technical errors, spelling mistakes and other inspection criteria. The Program Manager gives it a final review prior to mailing. Per EPA guidance, reports should be provided 30 days after the inspection. During the past fiscal year, 78% of the reports were issued more than 30 days after the inspection. On average, most reports are issued 62 days after the inspection.

The Goal
Reduce reporting time to a maximum of 30 days.

The Lean Process
We framed the process initially by identifying the SIPOC, Suppliers, Inputs, Processes, Outputs and Customers. We then mapped out the entire process, including the pre-inspection preparation. In particular, the report contents and review sequenced were examined in great detail. A significant amount to waste was identified. For example, “results” were enumerated several times in the report and cover letter. The report was being reviewed by Enforcement, even when no enforcement action was indicated. Another Lean tool we used was “5-why’s” to help us get to the root of the problem (over-complicated report format and review process).

The Results
The reporting time was reduced to 20 days. The number of completed inspections increased to 75 (anticipated at the end of FY ’13). The database was amended to facilitate report tracking. An SOP was prepared to ensure consistency. A number of future opportunities were identified, including increasing the number of sites inspected, modifications to the permit template, and decreasing the overall time to perform an inspection.

Accomplishments
• Revision of cover letter
• Devise a new report format;
• Streamline review process;
• Prepare an SOP to ensure compliance and consistency;
• Promote lean within the agency;
• Cut report time in half;
• Facilitate tracking of report time.

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“Spread the Lean Love”

Summary
Streamline Inspection Report Preparation to Meet EPA’s 30-day Final Report Policy

Using Lean principles, Department of Environmental Service, Air Resource Division, Compliance Bureau was able to reduce report preparation time from an average of 62 days to 20 days.

Inspection Report Statistics

<table>
<thead>
<tr>
<th>Year</th>
<th>Avg Days to Finalize</th>
<th>Over 30 Days</th>
<th>% Over 30 Days</th>
<th># Inspections</th>
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<td>2012</td>
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<td>50</td>
<td>78.1</td>
<td>64</td>
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<tr>
<td>2013</td>
<td>14.3</td>
<td>3</td>
<td>7.81</td>
<td>75</td>
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*2013 Inspection quantity anticipated by the end of FY