Spill Response & Complaint Investigation Section (SRCIS) Complaint Process

The Service
The Spill Response and Complaint Investigation Section (SRCIS) within the Oil Remediation and Compliance Bureau responds to a variety of spills and complaints related to improper storage and disposal of petroleum, hazardous and solid waste.

The Problem
Each year, the Spill Response and Complaint Investigation Section (SRCIS) receives and investigates a large number of complaints related to various DES rules including site remediation, tank compliance, solid waste management and hazardous waste management. Additionally, SRCIS, with other sections within DES, coordinates joint investigations for asbestos management, open burning, and wastewater. Inefficiencies may arise in the absence of a documented process for recording the complaints, identifying which complaints require follow up, routing complaints to the appropriate programs, investigating the complaints, and coordinating follow up by multiple programs when violations span multiple disciplines. Recent stresses on oil pollution funding necessitated adoption of a highly efficient process for managing complaints from receipt through resolution.

Goals/Metrics
1) Reduce number of site visits per site. 
2) Establish consistency in complaint follow-up.
3) Establish a policy to determine which complaints are prioritized, since there is very limited funding to support this activity.
4) Identify additional resources for the complaints that will be referred under the new policy.

The Lean Process
The Team used a “Swim Lane” Map to plot the various steps of the complaint handling process. This event focused on complaints; SRCIS’s other major duties including spill response and emergency preparedness were outside the scope of this event.

The team conducted an “Affinity Exercise” to categorize the types of complaints received into four broad categories: dumping of solid waste, referrals to other bureaus, threat to the environment, and hazard to human health. The data showed the majority of complaints received involve dumping of solid waste. There is very limited funding to support the investigation of solid waste complaints and no funding for the removal of solid waste.

The “Future State” will reduce the need for multiple inspections at the same location by notifying the property owners of the enforcement process during the first site visit and following up with a field citation if warranted. Enforcement decisions will be made using a strategy which all inspectors will follow to ensure consistency under various circumstances.

The Results
A standardized procedure to triage and handle complaints, which includes involving local officials more often and earlier was developed to document the process. The Report of Initial Complaint Investigation form, which is used to inform property owners of corrective actions was updated and modified to encourage compliance before seeking formal enforcement. A standardized procedure to enter and track database information on investigations and enforcement actions is being developed. An enforcement fact sheet informing property owners of potential enforcement actions at the time of the first site visit is also being developed to describe DES’s approach to achieving environmental compliance.

“Field citations will give us an effective way to reduce the number of site visits.”
-Dave Leathers, SRCIS Responder