

Results of November 2015 Idea Mining Event

Project Idea Mining Events - November 12 and 13, 2015

Water Protection Program Section Results (11/23/2015)

Introduction:

On November 12, 2015, 13 customers of the Water Protection Program offered their ideas for improvement during a morning Idea Mining session. The following day, staff from the program offered their thoughts during the morning and then a smaller group (with Todd Sampsell representing the opinions of the customers) placed the ideas from each groups' Hi Impact/Low Difficulty quadrant of an impact/difficulty matrix (Section 1) onto another matrix. Six ideas were chosen from the new matrix for implementation.

This document combines the results from the two days into a complete list of the ideas offered. We recorded all ideas, but some may have been combined with others during the afternoon session on Friday and thus may not appear independently on this list. This list is broken into two sections according to the Impact/Difficulty assessments done during the event.

Section 1 contains all ideas placed in the High Impact/Low Difficulty quadrant by any group during the two morning sessions. These are the ideas considered in the afternoon session. The first segment of this section contains those ideas chosen for action at the end of the idea mining event, and the designated leader(s) for initiating work on those ideas. The second segment in Section 1 consists of the ideas that the program staff judged to be "Just Do Its" that could be implemented without further help from the E3 Team. The following lists in Section 1 contain all the other ideas from the High Impact/Low Difficulty quadrant in the mornings arranged according to the Impact/Difficulty scores each received during the afternoon session. Ideas on these lists, as well as ideas in Section 2,, may be considered for action at a future time.

Section 2 contains all ideas not identified as High Impact, Low Difficulty by any group during the morning session. They are listed from the highest impact to the lowest impact within each morning session group.

SECTION 1 – High impact/low difficulty ideas from all groups

Selected Projects:

1. The process for public notices/folder review has too many review steps that delay public notices. Most projects have no changes between public notice and issuance, but they undergo the same process both times. Add memos and permits. (Tim Bull)
2. Forms process – When I send a form to be posted there is no more communication. Maybe tracking could be added? (Larry Archer)

3. Establish fee collection process that is effective and clarifies who does what. (Kristi Savage-Clark, Sherri Bell, Brenda Bardwell)
4. Establish a process for early coordination between WPS/OPS/ENG re TMDL implementation. (Mike Kruse)
5. NOVs, LOW and documents need to be directed to technical staff – not elected officials. Phone calls, emails in advance of LOWs, NOVs, enforcement actions. (Paul Jeffery)
6. Define concept, process and staff responsibilities related to Our Missouri Waters:
 - o Allow for more interaction between OMW and the environmental specialists in the WPP.
 - o Solidify across program coordination for watershed planning.
 - o Clearly articulate the purpose and role of OMW for the program and WPS. Lack of clarity resulted in staff frustration and inefficient use of staff resources. (Jennifer Hoggatt)

Just Do Its:

1. The PERFORM process should be a 2-way process. The direct reports should have the ability to evaluate their supervisor just like the supervisor does the direct reports.
2. Performance plans do not take into account the expertise or talent of staff. Rather it is a one size fits all. It needs to promote staff's talent and assist in the development of weaknesses.
3. PERFORM only as negative outcomes. Should have positive too.
4. Ask staff to visit facilities they regulate.
5. During the last 30 minutes of each meeting prepare a set of action steps for next meeting from DNR and stakeholders.
6. Have technical info in one location for both physical (books) and electronic references.
7. Clarify continuing authority boundaries and create a map viewer layer.
8. Create a GIS layer for wastewater lagoons/storage basins.
9. Better cooperation between sections: example: when asked for a member to attend a meeting, the section provides staff, not just a fact sheet.
10. There should be better management of workgroups. In the last couple of workgroups, the project goals were not clearly defined, so we spent a few meetings trying to get on track. Many times, people who create the group are not involved.
11. We don't have a process for the accounting program to immediately notify enforcement when we get a signed order, penalty payment. It can sometimes take weeks to get notification.
12. Excellent video of WPF and CWC meetings, but the meetings need to be more efficiently run. For the CWC, the Director's report and other presentations should be on the web with more delicate issues dealt with verbally.
13. Provide more audio/visual projections of meeting for out of town folks, such as water quality standards.
14. Customers are transferred too many times before finding correct contact. (Dept wide/outside program.)
15. When new wording is approved that document is used as template and old document should be deleted or moved to an old template folder.
16. The department should not provide single-use plastic water bottles at meetings.

17. The program can make available the information from memos, departmental decisions, etc. more categorized and easily available.
18. We need better tracking of decisions made that are not done in memos.
19. During training process, familiarize permit writers with contents of Dept. memos.
20. Organize documentation of internal processes and permitting decisions so new permit writers have a consistent resource for knowledge.
21. Update permit section procedures manual to include names of tasks instead of just task numbers. It takes forever to find the one needed.
22. Update permit writers manual. Make it more fluid with specific situations we forget because they are not performed often. Probably needs to be internal.
23. Design a decision tree for typical scenarios that come up through the permitting process.
24. Review manual and create new mechanisms, knowledge and retention, training decision tracking.
25. Require permitting to consult with Compliance and Enforcement on any new changes to permit.

Other Ideas rated as High Impact, Low Difficulty: (Impact score, Difficulty score)

1. Implement Merit Raises to retain knowledgeable staff. (8.77, 4.65)
2. Permit writers and inspectors need most up to date information on the current operations of a facility. (8.24, 4.22)
3. We do not have access to all information for a regulated facility in one location with standard electronic Form. (7.96, 5.69)
4. Need quicker turn-around time for legal reviews. (7.95, 4.36)
5. The enforcement section has far more cases to be managed than case managers to manage them. Additional staff is essential for productivity. (7.76, 6.15)
6. Make permit process electronic (application, draft, publication, approval, issuance) (7.71, 6.00)
7. Staff do not feel that they have enough technical training in their fields. (7.67, 5.06)
8. Improve inspection consistency (not opinion-based) between regional offices (new staff, retirements and resignations). Need better information transfer and enforcement discretion defined. Inspection reports are a public document, so improper wording can create a misimpression. (7.50, 4.61)
9. Create a more user friendly interface with web (both intra and internet) with better searchability. (7.39, 4.96)
10. Improve communication between the public and the WPP with regard to grants and projects available. (7.38, 3.46)
11. The time from a stream being listed until a TMDL is developed is too long. TMDLs and implementation plans need to be developed more efficiently. (7.35, 6.59)
12. Streamline the rulemaking process (internal procedures) and finalize the procedures document. (7.15, 5.36)
13. Getting soil morphology data takes a long time. (7.11, 4.52)

14. Implement simpler, shorter enforcement process in both the central offices and regions. Take faster enforcement action on facilities. They know things get drug out so why act now. (7.11, 5.39)
15. Develop web pages for the public that explain the processes for the different permit types (and define what needs a permit). (6.98, 5.11)
16. Have and maintain a centralized location for all folder processes. (6.94, 3.93)
17. Stakeholder meetings could benefit from increased structure and mediation when contentious topics are on the table. (6.88, 4.17)
18. Centralize all permitting, including general permitting to the Central Office and adopt the EPA multi-sector general permit to reduce 20+ DNR master general permits. (6.88, 5.69)
19. The GIS sample site layer is cumbersome and does not allow for data to be easily queried for analysis. (6.83, 5.21)
20. Improve the Perform process to include 360degree, peer reviews and management for improvement. Tie goals and objectives to departmental plan and incentivize. (6.78, 5.23)
21. Need a mechanism in MoCWIS that would communicate to Fee Tracking System that a system has had an adjusted design flow. (6.68, 4.59)
22. We need a better understanding of GIS licenses and user needs. (6.63, 37.72)
23. The process of entering Stream Team data is broken and repetitive from MDC to DNR. (6.63, 4.78)
24. Grandfather in old privately owned (HOA, Developer) sewer systems, but change the system now for new permits so we don't continue to deal with entities that go bankrupt. (6.62, 6.29)
25. Electronic projects not completed to fullest, but instead create staff-intensive procedures like dual entry. (6.61, 5.58)
26. Draft document reviews are not done in a timely manner (bottlenecks). (6.59, 5.38)
27. When amending rules and regulations, the department needs to make it a priority to include small facilities as stakeholders. (6.58, 4.81)
28. Update customers on permit process delays and modifications. (6.57, 4.39)
29. Continue to inform technical staff on the history or potential ramifications of proposed studies. It's good to know whether a project is potentially politically sensitive or litigious. (6.55, 4.14)
30. Move inspections/enforcement to an electronic process (with some paper). (6.55, 5.66)
31. Eliminate silos - cross train staff. Environmental issues overlap, citizens/stakeholders work with many programs. (6.53, 5.77)
32. Cost affordability analysis process sounds good, but the minimal amount of data included does not provide much value relative to the amount of time spent. The cost analysis for compliance needs to be done more consistently. Reissuing permits with uninformed DNR Financial Assessments and then imposing NPDES compliance schedule is a waste of time and sets a community up for failure, enforcement, fixing the permit. Do it once with the right process. Require an options study and FCA information in the permit, then decide the path forward. (6.49, 6.81)
33. Fish kill reports from MDC and EER should be given to the case manager together. An NOV should be issued to the Responsible party. (6.38, 3.41)

34. Adjust permitting of collection only and regionalization projects so that they can discharge to a treatment system without the treatment system at risk for collection operations. (6.32, 5.96)
35. There is a lack of understanding between Watershed Protection Section and certain parts of the Permit Section regarding responsibilities and how the work of each section impacts the other's (e.g. monitoring). (6.29, 3.77)
36. There is a disconnect between environmental engineers and administration. I always have to resort to leadership for results. Need better training for EEs (both knowledge and policy) (6.26, 5.68)
37. Highlight streams that will have multiple studies (e.g. biological assessment and waste loads) conducted in the same time frame. This will allow for one point of contact for our landowners some of whom can be turned off by multiple government contacts. (6.11, 5.45)
38. Stop pursuing enforcement for compliance with items that regulated community had already entered into a Consent Decree or Administrative Orders, etc. with EPA. The time and resources NR spends pursuing enforcement could be better spent. (6.10, 3.96)
39. Improve communication and collaboration on projects involving MGS. (6.07, 3.78)
40. Create records in MoCWIS in a more consistent manner with accurate descriptions in permits to aid in determining which features are UIC class V and which are not. (6.07, 4.62)
41. Clearly identify the appropriate role for and management of the National Hydrography Dataset (NHD) within the department. As the steward for the National Hydrography Dataset, DNR is not fulfilling the Memorandum of Understanding – to update and maintain the dataset and increase and coordinate its use within Missouri. Currently one staff member is managing the stewardship. We are referencing our water data to the National Hydrography dataset. The next step in using the NHD would be analysis. There currently isn't a group investigating how/if the NHD could help us accomplish our work. (6.04, 4.73)
42. Use the EPA/Lab as a resource in planning and technical planning. Use technical resources from customers. (6.04, 5.15)
43. MoCWIS does not track certified operators to facilities making it difficult to determine compliance with the requirement to have a certified operator. (5.87, 4.90)
44. Utilize the expertise of MGS better (e.g. lagoons being monitored; talk to MGS first). (5.69, 3.50)
45. Define duties better. Many times I am doing other things besides primary function of permit writing (compliance assistance, fee determination, data entry, etc.). (5.65, 3.92)
46. The purchasing process takes too long (e.g. office supplies) (5.62, 3.59)
47. We need an easier process for permit writers to know when a permit is currently under enforcement, and then more communication between permit writers and enforcement staff during the renewal/modification process. (5.60, 3.21)
48. Track incoming information that goes to individual sections and regional offices (5.52, 5.63)
49. Change the formats of the permits so that they are easier for facilities to understand. (5.40, 5.41)
50. Continue to improve the process for migrating UIC class V data from MoCQIS into MGS's UIC database for ultimate reporting to EPA. (5.33, 5.11)
51. Review NPDES permits before issuance to make sure it is consistent with other permits and regulatory requirements (5.32, 4.05)

52. Make the first response, “How can we make this happen”, not “This is why we cannot do this.” Think outside the box. (5.28, 5.48)
53. Develop a division strategic plan and use it to prioritize activities/resource and communicate with internal and external customers and use for budgeting/funding. (5.24, 5.44)
54. DNR staff should not respond to routine SSOs – they do not add value in communities with demonstrated response capability. (OK is non-routine, sensitive area, public interest or to audit community practices). This is especially irksome when DNR then seeks cost-recovery for non - value added SSO response. (5.12, 3.59)
55. Need to consider affordability and variances for private systems. (5.00, 6.11)
56. There is a lack of flexibility in applying WQ standards to MSOPs (i.e. looking at actual environmental impacts instead of arbitrary limits). (4.80, 7.47)
57. Redline all documents from earlier versions. (4.35, 5.31)

Non-rated entries in Quadrant 1 (High Impact and Low Difficulty)

1. Evaluate the eDMR process for enhanced efficiency. Ex. Separate security question and PIN for each entry. eDMR training in the regions would help more people sign up and use the eDMR system. Enhance MoCWIS to identify which facilities are in eDMR. EDMRS errors in MoCWIS cause false violations for facilities. MoCWIS errors “glitches” cause false violations for facilities unless person already knows it’s an error.
2. Coordinate inspections in different media.
3. Can DNR be more actively engaged in Economic Development to facilitate and promote Missouri business development?
4. Encourage FAC/SRF projects to put plans into e-plan to facilitate more competition for projects.
5. FAC and CP staff could identify all DNR implications for a proposed project.
6. Rulemaking/Regulation Development – Department staff developing should be well versed in proposals. If it is going to be done tell stakeholders such instead of asking.
7. Too many stakeholder meetings: Don’t know if cover for DNR or truly wanting input from stakeholder. Feel trapped by meeting if I attend, left out if I don’t attend.
8. Improve coordination between, and/or reconnect the 319/nonpoint source unit and the watershed protection section.
9. Stakeholders at Water Quality Standards meetings have asked for knowledgeable staff to be at meetings when discussing topics/issues that span permitting, drinking water, etc. Currently the section chief from permits attends, but no one from public drinking water. There seems to be a lack of coordination when working across programs.

Section 2 - High impact/high difficulty, low impact/low difficulty and low impact/high difficulty ideas from all groups

Quadrant 2 – High Impact, High Difficulty

1. Improve communication and coordination between different engineering sections with WPP (lack of continuity)
2. Electronic permitting does not capture all general permits, but it can.
3. Increase public outreach and education.

4. Push electronic reporting processes, like eDMRs, e-permitting, smart phone apps for inspections. Don't require all forms to be original ink.
5. Promote eDMR or enter DMR data and respond to violations more quickly. I often hear from facilities that it takes 6-8 months to get LOWs for effluent violations.
6. Concerns, especially anonymous concerns are a big demand on inspectors' time and often return a relatively small reward for that time. No longer taking anonymous concerns and having a dedicated concern investigator may help.
7. Reduce the number of tracking databases. Having one database will be easier and cheaper to maintain and upload. (e.g. ISIS and ECHO).
8. We have a shortage of certified WWTP operators in rural areas. We need a way to push training to these folks.
9. We should standardize regional office file drives and naming conventions.
10. Develop a clear and consistent process for implementing CCR rules and closure of ash ponds at utilities.
11. Initiate rulemaking to better address UIC permits, permit requirements, and a sampling schema for on-site wastewater systems that could alleviate the need for site characterization and groundwater monitoring of soil absorption areas where site characterization isn't feasible.
12. Data collected by ESP is often only relayed to the LIMS system. This does not always include all information needed, requiring WPP staff to edit or emend once received.
13. Long term planning needed to coordinate biological criteria into the water quality standards.
14. Don't exceed CWA with idea we are better environmentalists. All these regulatory issues are complied with by the same taxpayer dollar.
15. Our CW commission is under-skilled compared to the S&W commission. Solve this.
16. Move multiple independent rule changes at the same time rather than just one slow lane.....
17. EPA relationship – we need to better understand when we need EPA input, and when we do not. Ask staff to talk to EPA – we have talked to DNR about issues – that EPA doesn't have.
18. Succession planning is not talked about? Why?
19. Institutional knowledge – We need to find a way to capture institutional knowledge before it all leaves DNR.
20. Scan all the documents the RO has on the "T" drive. (I mean ALL)
21. Improve travel process for staff – too many approvals.
22. The "process" (permits, water, grants, loans) is not understood by people who are only exposed to DNR for a short time (i.e. mayor, city clerk).
23. UIC Permitting – This permit process is particular takes too long, seems to require more specialized knowledge than DNR has and seems less coordinated. (Hint: we're not sure who's in charge.)
24. We need to build and solidify program of TMDL implementation.
25. All folder process can lag or may be relatively quick. Although deadlines may be given, they are often ignored.
26. Listing and tracking changes to waters in water quality standards uses a single reach (stream/tributary) approach, while permitting, planning, monitoring, models, total maximum daily loads, etc. all are moving or using a watershed approach. Water quality standards are stuck in the 70's when tracking information. This requires 50% of my time to fix and improve with changes only allowed every 3 years.

27. Identify a process, including staff assignments, to perform a large number of UAAs (use attainability analyses (to address the large number of newly classified streams (i.e. reduce the number).
28. There is not a clear framework for prioritizing workload when multiple projects have come in from different sources.
29. The lab information management system is not set up/designed to allow the data stored to be integrated with program systems.
30. Process for obtaining general counsel legal review takes too long and there is no update on what is being done and when we can expect a response.
31. Reduce the distance travelled by field staff to respond to reports of pollution and conduct inspections.
32. Enforcement does not have direct access to general counsel for changes/issues related to our legal agreements. We have to wait for access, which slow the process.
33. When we need to change a report or something related to MoCWIS the process is convoluted and takes a very long time.
34. Consistency in issuing letters of warnings/NOVs with same templates – across all ROs.
35. Establish a process for conducting pollutant modeling for certain pollutants prior to permit limit establishment.
36. Improve inspection targeting process so that inspections are focused on facilities with known compliance issues.
37. Create a system or way to report errors or inconsistency in MoCWIS that need to be addressed. Prioritize by immediate need for the change. Re: Portal- WEBI database would be more useful if ALL MoCWIS fields could be queried.
38. There seems to be an issue with the ability to issue new permits on impaired waters.

Quadrant 3 – Low Impact, Low Difficulty

1. Consistently use Cisco Jabber to track employee location
2. Have specific groups of people identified for problem solving projects.
3. Update and maintain the memo folder on the T drive and include major policy updates.
4. Receiving paper application documents is inefficient compared to electronic submittals.
5. Create an internal environmental review process.
6. We need a more transparent and consistent process for requesting 401 certifications.
7. The lack of a definitive writing style guide creates additional, unnecessary review and slows down certification/permit issuance.
8. A permit is shown to the permittee before supervisor/manager review. I often have to go back and make changes after the permittee has already reviewed it.
9. Stormwater staff are not offered a similar certification like domestic permit writers.
10. We have a difficult time getting expired site specific permits renewed. The applications are sent to the Central Office so there is often a lag time before it is entered into MoCWIS. (WET test).
11. DNR staff need access to technical training which is not necessarily available in MO. Can we make out-of-state travel easier to approve?
12. We need to track reports after mailing and have required follow up.
13. Find out why regional offices are putting general permits in the web upload folder. If no reason, remove process. These permits just sit there and are not posted to the web.

14. Joint workshop/training between WPP and clients to facilitate a better understanding of what it is we do for each other. Hold a Q and A session as a part of it.
15. Provide "Wastewater Systems 101" training to geologists.
16. Provide more consistent communication regarding expected timelines for submitting work projects (in addition to what's defined in the QAPP).
17. There seems to be no process for establishment of water body IDs before data generation on small streams with generic ID 3860. Data cannot be tagged with an ID from the beginning of a project and is difficult to track.
18. The QAPP process of project assignment is not completed prior to when ESP has to submit manpower estimates and financial plans.
19. Limit acronyms – these keep people out of the process and don't allow for good communication between DNR and stakeholders.
20. On-line payment for permit fees, e-invoices
21. Different rules for private vs. public – i.e. MSOPs, affordability, etc.
22. Consider creating more categories on GovDelivery to target customers better.
23. The heavy metals in effluent is a big deal. DNR appears not to be ready to implement this initiative.
24. Not everyone keeps their electronic calendar updated – this should be consistent so that scheduling meetings is easier to do as well as general communication between staff.
25. Make logon to Cisco Jabber automatic for All staff when they log on to computer in morning. Tool is not useful if only some staff use it.
26. New hires are often just thrown into a job and then building with little to no time being shown around.
27. There is a lack of communication between the program and the communications program. We need updates from them on how the department wants to see reports, press release, and other forms of communication and we don't seem to get that info readily.
28. Provide food service to building again. Preferably quality, healthy food that people want to eat (or healthier vending options).
29. We need a computer and projector at almost every meeting or the ability to "pop-in" to a conference room to discuss applications and data but this requires checking out and setting up equipment every time – taking ~30 minutes.
30. Out of state travel procedures are lengthy, dysfunctional and change too often. Too many reviewers as well.
31. Bid form for <\$25,000 is confusing to line staff who are charged with completing.
32. We need more frequent updates on status of TMDLs.
33. Mark those documents that get sent to regional office as PDFs that are confidential with water mark as confidential.
34. Permit denial process.
35. Standard report query format for 1st try responsiveness to report requests.
36. Given employee turnover, it would be very helpful to have a comprehensive list of who does what for all programs.
37. Go back to letting section staff submit JIRA and IT tickets instead of program secretary and 2 others having to submit all.
38. Promote better topic coordination of WPCB during exec staff meetings. (PDWB should have their own.)
39. A seating chart online would be very helpful in accomplishing daily duties.

40. Improve permit modification after construction, particularly when current permit is expired requiring another public notice and delay.
41. Come up with appeal procedures.
42. Regions that conduct electronic discharge monitoring training are not notifying central office who/when they are training.
43. Come up with variance procedures.

Quadrant 4 – Low Impact, High Difficulty

1. The health courier that picks up samples through the state runs too early to be useful to our inspectors.
2. Standardize enforcement across programs by identifying the most effective attributes of each to create a best practice. Eliminate silos.
3. A process for logging that a Wet Test has been received will prevent false violations to facilities. Enforcement section must know who has submitted their test.
4. There is a “bottleneck” in document review in Enforcement section with staff producing documents for review numbering 6 and chiefs at 3 and final approval coming from 1 person, the documents stall out when pending review and productivity stalls or stops.
5. Enforcement does not have access to some regional office documents, like sludge reports and inflow and infiltration reports that are relevant to our cases. Not having access increases the chances of errors and false violations. A dedicated location on the share drive where these reports are stored would be helpful.
6. The regional offices/AGO/other water protection sections sometimes send hard copies of correspondence. Electronic copies would be more helpful and reduce waste directly to case manager.
7. X Enforcement notifications from others who deal with entities MoCWIS with Red X.
8. The enforcement section needs to have a better training program for new hires. A structure program used to walk a new hire through the steps of a case from start to finish. A part of that training, a clear explanation of AGO documents and steps is necessary.
9. Retain/ability to hire engineers/qualified staff. Recruitment.