# E-Enterprise Leadership Council Program Modernization and Streamlining Project Nomination Template

## Endorsed by E-Enterprise Leadership Council on March 17, 2014

*E-Enterprise Vision: The E-Enterprise for the Environment Initiative is a State and EPA effort to improve environmental outcomes and dramatically enhance service to the regulated community and the public by maximizing the use of advanced monitoring and information technologies, optimizing operations, and increasing transparency.*

The E-Enterprise Leadership Council (EELC) is soliciting new project ideas for evaluation of their potential to advance E-Enterprise. E-Enterprise is not just another big IT project or another business process improvement project – it is an initiative aimed at creating a fully integrated approach to improving environmental protection. Ideal E-Enterprise projects are those that improve efficiency and modernize programs, reach across organizational boundaries, and are consistent with the vision and principles outlined in the E-Enterprise Conceptual Blueprint[1]. Embodied in E-Enterprise is a State and EPA commitment to achieve the E-Enterprise vision by making meaningful changes, no matter the size or difficulty. The EELC wants new ideas and early wins that will improve environmental outcomes and improve service to the regulated community and the public.

In May 2014, the EELC anticipates selecting a small set of projects for a full scoping and business case analysis. The EELC will select these projects based on the information you provide below after an evaluation against the E-Enterprise vision and principles. Based on the results of the further scoping and business case analysis, the EELC may recommend a project for subsequent funding.

The EELC is encouraging project proposals of all types and sizes including:

- Collaborative opportunities that jointly benefit States and EPA
- Program modernization projects, e.g., program changes and improvements
- Process improvement projects, e.g., streamlining initiatives
- Projects that improve service delivery, e.g., training/certification programs
- Projects that are consistent with the E-Enterprise Principles
    1. Manage E-Enterprise from the beginning as a partnership led by a joint governance body and work together to develop funding mechanisms and inform the independent resource investment decisions of partners.
    2. Respect existing delegations and operating agreements throughout program changes driven by E-Enterprise. If seizing improvement opportunities calls for changes, negotiate these changes through existing channels.
    3. Streamline and modernize programs before automating them. Streamlining and modernizing programs includes exploring use of new environmental management approaches to harness program improvements and technologies. New environmental management approaches may require tackling challenging or controversial issues, regulatory changes, and take a long time to complete.
    4. Use a business case approach to prioritize activities.

[1] Available online at: www.exchangenetwork.net/wp-content/uploads/2014/01/EEnterpriseConceptualBlueprint-013114-FINAL.pdf

5. Ensure that the program and system development explicitly takes into account the user's perspective.
6. Establish a seamless and secure network of services and systems to improve two-way business transactions between the regulated community and partners and among partners.
7. Ensure systems will work smoothly together, for staff, regulated entities, and the public.
8. Automate access to data to promote re-use of information and services by users and their application developers.
9. Explore the integration of advanced monitoring, data collection, and analysis techniques into programs and explore the new management approaches they might enable.
10. Lower cost of program and technical implementation by providing funding and shared infrastructure.

If you have a project idea, please document the project using the template below and email it to Rob Willis (rwillis@rossstrategic.com or (206) 792-4082), interim E-Enterprise Coordinator, by April 16th, 2014. Please don't hesitate to contact Rob Willis with any questions.

***E-Enterprise Project Nomination Template***

Project Title:

Contact Information (Name, Email, Phone):

Brief Description (< 1 page):

- Please describe your project including: how this project improves current practice; and the project timeframe for implementation.

Potential Benefits (< ½ page):

- What are the project's potential benefits?
- How does the project improve service or environmental outcomes?

Partnership and Other Considerations (< ¼ page):

- What are project implications for all the different partners involved?
- Are there any regulatory changes or other prerequisite work that needs to be complete?
- What existing or related efforts are underway?

Project Challenges (< ¼ page):

- What are the primary challenges?

Project Resource Requirements (< ¼ page):

- How much will the project cost?
- What other resources are necessary to be successful?

# Appendix 1: E-Enterprise Project Scoping Proposal Examples

The EELC is encouraging creative ideas even if they are different from current practice or thinking. The examples on the following pages are intended to illustrate the types of projects that would be good candidates, but the project scoping proposals are not limited to only these types of projects. These examples have not been officially submitted to the E-Enterprise Leadership Council's Coordinating Team for consideration. These examples could be submitted by states or EPA as proposals for project scoping by a state or EPA pursuant to the request.

***Example Project Ideas***

*Financial Assurance Program Modernization*

One example is to evaluate whether various financial assurance programs could be streamlined or modernized. Financial assurance is an operational requirement for RCRA Subtitle C hazardous waste treatment storage and disposal facilities, RCRA Subtitle D municipal solid waste landfills, RCRA Subtitle I underground storage tanks, SDWA underground injection control wells, and TSCA PCB storage facilities to ensure proper facility management and closure, and to avoid the need to use public funds for site cleanup under CERCLA. These benefits can be lost unless there is compliance with the financial assurance requirements before an incident happens that would trigger the need to access financial assurance funds. Incidents could be a spill that exceeds the resources of a facility to clean up, or a bankruptcy by a facility before it has properly cleaned up its operations. An FA E-Enterprise approach could serve as a check on the submissions provided: the adequacy of the value of financial assurance and a system to respond quickly before a financial assurance instrument may become inadequate. Without effective financial assurance programs, the taxpayers are ultimately responsible for these cleanups. A scoping and business case evaluation would consider whether and how electronic reporting and other modernization approaches could improve one or more of these financial assurance programs. Such an evaluation is likely to start with consideration of the various financial assurance programs for improvement opportunities (e.g. smart two way electronic transactions that could consolidate or streamline requirements). The results of a scoping exercise could provide the basis to pursue, or not, further efforts for one or more of these financial assurance programs. The end goal is to make financial assurance programs more effective, easier for states and EPA to oversee, less burdensome on the regulated community, and expand transparency.

*Improving Radiation Monitoring and Emergency Response*

EPA and a number of State agencies conduct radiation monitoring routinely and during incidents; however, there has been no way to integrate these data streams to provide an overall picture of conditions. FEMA, EPA and DOE are jointly developing the RadResponder program to integrate and provide access to the local, state, and federal radiation data. EPA, DOE and FEMA are partnering with the Conference of Radiation Control Program Directors (CRCPD), an organization made up of state and major local radiation control agency representatives who regularly coordinate joint programs and projects in this arena RadResponder has been successfully tested and is currently integrating data with the New Jersey Department of Environmental Protection's 30-station continuous radiation monitoring network through use of the Exchange Network. Building on the success of using the Exchange Network for New Jersey's integration as a model, RadResponder will be expanded to several States who collect environmental radiation data routinely, in an effort to improve data sharing during an emergency like the Fukushima nuclear plant disaster in Japan. This project is consistent with key E-Enterprise principles of modernizing a program business processes (establishing improved emergency response capability), building it once and using many times, using advanced IT and monitoring technology as part of the modernization process, and streamlining exchange of data associated with such activities.

*Smart Tablets for State and EPA Inspectors*

Imagine a world in which state and EPA have smart tablets to help their inspectors prepare for an inspection, perform the inspection, analyze the results of the inspections, document the results of the inspections and even simplify the issuance of violation notices when appropriate. Such smart tablets would allow the inspector to easily gather and analyze the data to prepare for the inspection, such as pulling from EPA, state or other

relevant databases. The tablets would provide the inspectors with checklists to guide their inspection based on the specific requirements of the particular federal and state programs. The tablets would integrate with monitoring devices, such as infrared cameras and photo ionization detectors, and results from these devices (video or numeric) would then be stored and linked to the inspection. The results of the inspections could then be uploaded to state and EPA databases as appropriate, which would then improve the ability of states and EPA to track their work and enhance our ability to be more transparent.

Several states have developed such smart tablets and EPA is piloting such for one RCRA program. This scoping analysis would identify what has been done so far, identify the key features of such devices for streamlining and modernizing the inspection process and conduct a preliminary business case evaluation of the likely costs and benefits of EPA and state collaboratively developing such smart tablets on a national basis. This project is consistent with key E-Enterprise principles of modernizing a program business processes (inspections), using advanced IT and monitoring technology as part of the modernization process, using shared services to create such tools (rather than all states and EPA creating their own tablets), and streamlining exchange of data associated with such activities. This project would build on the data standards and protocols established by the Exchange Network. It would need to be done in phases, of course, and the scoping study would suggest how this might be phased.

*Hazardous Waste Coordinator Certification Training Program*

An example of a program improvement project is the New Hampshire (NH) Department of Environmental Services Hazardous Waste Coordinator Certification training program. This program requires someone from every NH Full Quantity Hazardous Waste Generator to attend training every year. Last year 320 companies were required to have a trained coordinator – in fact 937 attendees came to the training program. Violations for this segment of the regulated community continue to decrease – currently 50% of what they were just 6 years ago. This approach is successful not only because of the increased knowledge of the generators but because the barriers between state and industry have been broken down and generators feel comfortable calling state regulators to discuss their hazardous waste issues. This project is consistent with key E-Enterprise principles of modernizing a program and improving service to the regulated community.

*Clean Air Act Title V Operating Permit Modernization*

This effort would establish a centrally-administered data system (or consistent state-level data systems that feed a national tracking system) to handle and track work flow associated with Title V permit applications and associated government actions by all state and local permitting authorities. The system would facilitate meeting Clean Air Act objectives, improve efficiency and effectiveness of the permit application and compliance certification processes, and improve program oversight. As part of the system development process, existing work flow would be examined and refined or streamlined as necessary. The system would provide industry, governments, and the public with a nationally consistent and transparent system for submitting and monitoring Title V permit application activity (and possibly petition activity). Public accessibility would fulfill electronic public noticing requirements.

***EXAMPLE E-ENTERPRISE PROJECT NOMINATION USING PROJECT NOMINATION TEMPLATE***

***Title:*** Improving State and EPA management of the State Implementation Plan (SIP) Submission Process

**Contact**

***Brief Description***

The process and technology the states and EPA use to track and manage the status of all state implementation plans (SIPs) could be improved to reduce burden and improve functionality. Currently, EPA regions use multiple systems to track SIP submissions and these systems are not accessible to the states. The absence of a standardized submission process and comprehensive management system has led states and regions to develop their own approaches to track information. The project proposes redefining the SIP submission work flow using LEAN principles and developing a supporting comprehensive SIP management system that integrates SIP development and review. This project would provide greater transparency and efficiency in SIP development and review.

Specifically this effort would reduce the states' administrative burden of submitting paper-based copies of SIPs and would establish a national process to collect and report on SIP submissions. The supporting system would be consistent with the current EPA Region data systems (that currently provide national reports) to handle and track work flow associated with state implementation plan (SIP) submissions and associated EPA regulatory actions. The project facilitates meeting Clean Air Act objectives, improves efficiency and effectiveness of the EPA SIP reviews and approvals, improves program oversight, and improves transparency. The system would provide states with a nationally consistent and transparent system for submitting SIPs and could provide the general public the ability to monitor the status of SIP submissions.

This proposal supports EPA's commitment to institute electronic submission in place of existing paper based reporting to meet the Agency's regulatory reporting requirements. Specifically, the proposal would:

- work jointly with our State partners, through a LEAN process, to examine, refine, and streamline the existing SIP submission, tracking, and processing activity work flow;
- Design an efficient reporting system which meets the needs of all partners;
- advance the Agency's effort to meet the Agency Priority for E-Reporting;
- support the Digital Government Strategy issued by the White House in 2012 that calls for the EPA to continue to evolve its reporting systems to take advantage of new technology and improve transparency of our stakeholders; and
- achieve the goals of the Agency's larger E-Enterprise for the Environment Initiative.

Potential Features

- Allows for comprehensive national-level management and reporting of state implementation plans
- Provides a full picture of the life cycle of the SIPs from nonattainment to attainment and maintenance.
- Allows state, local and tribal governments and the public access to review state implementation plans

***Potential Benefits***

- Provides access to information by State Co-regulators: A national portal will make information available to our state partners in regulating industry.
- Reduces Burden of EPA and the States: The system will enable governments to clearly and easily meet all administrative Clean Air Act and regulatory requirements.
- Enhances oversight and management: A centralized collection of SIP submissions and actions would enhance federal and possibly state oversight and management.
- Tracks SIPs: Allowing governments and the public access to follow SIPs that impact their areas would fulfill electronic public noticing requirements and save states and EPA resources.
- Provides National Consistency: A common platform would ensure national consistency.
- Enables Learning and Collaboration: This system could facilitate learning among states about attainment plans and controls that are helping meet the National Ambient Air Quality Standards.

***Partnership and Other Considerations***

- A standardized data system might limit some of regional and state flexibility.

***Project Challenges***

- Regulation Changes Needed:
    - Regulatory changes to the CFR Part 40, Parts 51 and 52 are required to collect submission of State implementation plans electronically
    - OGC agrees with the regulatory changes needed.
- Specific amendments include:
    - § 51.103 Submission of plans, preliminary review of plans
    - APPENDIX V TO PART 51 -- CRITERIA FOR DETERMINING THE COMPLETENESS OF PLAN SUBMISSIONS
    - § 52.16 Submission to Administrator
- Alternative: Smaller scale development ideas would include:
    1. Creating a template for consistent state-level data systems that feed a national tracking system.
    2. Establish an EPA-wide system for tracking state implementation plans that could then serve as a model for state and local permitting authorities.