



## INTER-OFFICE COMMUNICATION

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**TO:** Permit Writers and Permit Reviewers

**FROM:** Mike Hopkins, Assistant Chief, Permitting, DAPC

**DATE:** January 8, 2009

**RE:** Permit Workload Clean-up

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The purpose of this memo is to identify the tasks I would like DO/Laa permit writers and reviewers to complete in an effort to clean up the installation permit task lists. This issue was discussed during the January 7, 2009 WebEx meeting concerning the current installation permit workload. Based on that discussion, I would like each DO/Laa to take on the below tasks by the noted dates.

### **Quick Clean up (Due by noon Thursday, January 15)**

Purpose: Clean up installation permit to-do lists as much as possible by making easy corrections/updates.

#### ***Which permits are we talking about?***

A list of these permits can be generated by producing the following report in Stars2:

In Stars2 select <Mgmt Reports>  
Select <Permits Status>  
Select the appropriate DO/Laa  
Select Permit Type: PTI and PTIO (you can select multiple items by using pressing the Ctrl key and clicking each one)  
Select Permit Reason: Initial Installation, Chapter 31 mod, and Not yet assigned  
Don't check General, Express or Query Type  
Click <Submit>

#### ***Tasks that need to be done***

Each permit writer/reviewer should review their list for applications/permits that are no longer needed or that need to be updated. This should include:

- Removing duplicate actions
- Making sure the permit type is correct (for instance, PTIOs may be misidentified as "install" instead of "renewal")
- Making permit type assignments for any installation permits that currently are "Not yet assigned"
- Add any hard copy installation permit applications that are not in the system
- Return any "not likely to process" installation permit applications (see the below discussion on returning applications)
- Get to-do lists caught up (for instance, if the to-do lists says the permit is "referred", but we already got the response from the company, then update the to-do list.)

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- Add a note for permit actions that are stuck and need work. The note should describe the reason it is on hold, stuck or delayed.
- Any other general clean-up to the to-do lists.

## **Decision on Returning Applications**

The current installation to-do list contains many permits that have been on hold for a long time. Our review indicates that 54 permits have been referred back to the company and out of these, 45 have been referred for more than 90 days. There are various reasons why these have been on long term hold but it is likely that most of these applications will not be acted on in the near term and should be returned.

DO/Laas will need to use some judgment in deciding when to return an application. However, in general, you can use the following guidelines to help you make these decisions:

- If the reason the permit is on hold is because we are waiting for Ohio EPA to do something, then don't return the application.
- If you decide to return the application, contact the company to let them know what you are going to do.
- If there is an enforcement issue that is holding up the processing of the permit and the enforcement resolution is not likely to be resolved within a short time (say a month or so), then return the application. An exception to this is that if the only reason for enforcement is the fact that they failed to apply for a permit, then the permit just needs to be processed. Make sure you coordinate any permit actions with your enforcement contacts.
- If we referred the permit and we have not gotten a timely response, we need to act on this action by doing the following:
  - Check with the company to make sure they got the referral.
  - Check to see if they still need the permit and/or are going to respond.
  - If they are not going to respond quickly, then return application.
  - If they commit to respond quickly, then don't return the application unless they fail to respond to your second request.
  - Reset the referral so the system will put the action on your to-do list if they don't respond in time.
- If the company is not in a position to decide if they want us to work on the permit, then let them know we have to return the application and they can reapply once the decisions are made. Remind them they will need to use the new system when they reapply.
- If the permit cannot be processed because the sources will not be in compliance, then let the company know that you either have to process a denial or return the application. If they want you to move forward with a denial, then discuss this issue with your Central Office permit contact for advice on the next step. (This permit will likely end up on the Long Term Processing Plan below.)
- If you are not sure if you should return the application, please discuss this issue with your Central Office permit contact.

## **Long Term Processing Plan (Due by Friday, January 23)**

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This task is designed to work through any permits that have been on long term hold and that have not been resolved via the quick clean up discussed above. These permits may be on hold because we are waiting for the company to do something or on hold because we are waiting for Ohio EPA or the AGO to do something.

In order to accomplish this I am asking each DO/Laa to review their list for any permit that is on long term hold (if you don't have any, then you don't need to do this task). For the purposes of this task I am defining long term hold permits as permits that either, (1) have been referred for more than 90 days, or (2) any non-referred permits that have been waiting for a task to be done for more than 45 days. You can determine which permits to review by generating the above *Which permits are we talking about?* list, and then sorting the list either on "Task State" to see all of the referred permits, or on "Task Days" to see how many days we have been waiting for the task to be done. Identify any permit that meets the above criteria.

Once this list has been generated, then I am asking you to develop a plan to review these permits in order to make decisions/actions to move them forward. This plan should include a list of these permits and the date by which you commit to review each permit. In this case, I am asking you to commit to complete an action that gets the permit "unstuck" so it can move forward. I am asking that the plan is put together by **Friday, January 23**. Please send a copy of your plan to me and Andrew Hall once it is ready.

I recognize that many of these permits may be low priority. So, I am currently not setting a deadline for you to get through all of the permits and, instead, I am asking you to review the work needed, set your own deadline based upon other important work, and then informing me of the result as part of your above plan. I am hoping that because of the economic downturn and subsequent reduction in the number of install applications, that now would be a good time to try to get these permit processed (I may be dreaming...).

Thanks for your help on this. If you have any questions, please don't hesitate to call me at (614) 644-3611.

MH/

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