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> Herschel T. Vinyard Jr. Secretary

TO:	Regulatory Directors
FROM:	Jeff Littlejohn, Deputy Secretary, Regulatory Programs TH
DATE:	November 16, 2011
SUBJECT:	Regulatory Compliance

Thank you all for the good discussions about compliance assistance and enforcement at the Secretary's strategic planning meeting and our subsequent directors meeting in July. I appreciate your collective experience and the careful thought you continue to give these issues. Based on your continuing input and further reflection, I intend the regulatory programs to move forward under the following guidance.

## **Compliance** Assistance

Keep uppermost in your mind that the department's primary *regulatory* objective is compliance with Florida's environmental laws. As such, compliance assistance must be integral and fundamental to our work.

Please expand your outreach, education and technical assistance efforts to help your constituents avoid violations. Reach out to local small business organizations, trade groups, homeowners associations, contractors, local governments, and similar groups to arrange regular and continuing educational meetings, Q&A sessions, permitting and compliance guidance workshops, etc. You provided Carla with examples of the kind of outreach assistance you undertake (attached). We need to actively transfer effective strategies across District and Division boundaries — and we will discuss how best to do so at our upcoming directors meeting. Compliance assistance must be integral and fundamental to your work. I expect the districts and divisions to work together to develop and implement well thought out programs with specific compliance objectives.

I also want to make sure we routinely offer the opportunity for pre-application meetings. These are particularly important for applicants with limited access to

consulting resources. They are also valuable for projects you believe are likely to prove controversial, in order to make sure the ground rules are clear up front and to understand the applicant's objectives.

Pre-application and compliance assistance is hard work and takes time. It is essential, then, to track it in terms of time and effort — and results. What's the pay off? Do our actions improve compliance over time and, if so, to what measurable degree? Can we determine which actions are most effective? Can we use the information to adapt and better target strategies? Cause and effect relationships may be difficult to establish, but we will work on that problem collectively over time. We also must have data systems to account for the time, effort and results; and we have to transfer knowledge — successful models should be expanded, unsuccessful ones dropped.

Formal assistance is essential, but your day-to-day encounters with regulated interests and the general public are the best opportunity we have to gain good will, trust and responsiveness — all of which will improve compliance and environmental stewardship. Build good relationships every day. Every phone call, every drop-in visitor, every inspection, every meeting of any sort is a forum for positive interaction. That does not mean your answer is always "yes" — it does mean that every transaction must be professional, respectful and helpful.

## Inspections and Enforcement

One tool for delivering compliance assistance is, of course, field inspections. Inspections are not only a means of detecting violations and making responsible decisions about enforcement, they also are a gauge by which to identify patterns and trends in environmental behavior in order to target compliance assistance. Patterns may involve a single actor over time, a type of activity, an area, or an industry sector, for example. While they may identify those who warrant meaningful enforcement, patterns may also reflect confusing regulatory requirements or inconsistencies in our application of requirements, both of which we need to fix. Understanding patterns requires attention and analysis. The results should be factored into future actions—so we can adapt and improve.

Where noncompliance occurs, despite your best efforts at education and outreach, your first consideration should be whether you can bring about a return to compliance without enforcement. The department's longstanding practice, explicitly set forth in the <u>Enforcement Manual</u>, recognizes that if compliance can be achieved without enforcement, the outcome is usually timelier and less costly than formal measures, especially legal proceedings, and allows the focus to be on fixing the problem, achieving positive environmental results, and moving forward.

Compliance without enforcement is certainly not appropriate in all situations, but it is the right approach when a violation is limited in scope, the violator is unaware or genuinely confused about the requirements and is cooperative and willing to rectify the situation and restore any damage. (Consideration must always be given to federal delegation agreements, which may prescribe an enforcement response.) Such situations typically can be resolved by informal agreement or letter, with agency follow-up to make sure the issue is resolved. If corrective actions are complicated and time consuming, a consent order making everyone's responsibilities clear may be a better choice.

In some instances, parties report on themselves when they discover an inadvertent violation. The department should encourage this behavior, which shows good faith on the part of the reporter and helps us quickly reach a positive environmental result. These situations may be handled without enforcement as well if the violation is limited in scope and the violator is not a chronic offender (unlikely for a self-reporter) and is willing to fix the problem and restore any damage. Again, if corrective actions are simple, the situation can be resolved by informal agreement or letter, with agency follow-up. If corrective actions are complicated, a consent order may prove necessary. (And, again, federal delegation agreement requirements must be considered.)

Determining whether achieving compliance without enforcement is the right approach is not always straightforward. Determining the right penalties when formal enforcement becomes necessary. The direction provided by the <u>Enforcement Manual</u>, including the specific guidelines for characterizing different types of violations, is essential to promoting consistent practices. The division offices and the Office of General Counsel are positioned to help make these judgments and review outcomes to assure that we are consistent. With that in mind, I will be asking the divisions and OGC to make recommendations to me on reviewing penalties and other compliance and enforcement practices.

			Focus on Change Seminars.	Improve understanding of the regulations.
Water	Drinking Water & Wastewater	6 times/year	The FRWA, in partnership with DEP, holds six one-day training seminars annually. This seminar program started in 1991 and over the past several years 1,400 operators and utility managers have attended annually. This program focuses on rule changes, new Department initiatives and ways to improve plant compliance. It allows operators needing continuing education credits to maintain their operator licenses in the water and wastewater fields.	Improve compliance.
			Stormwater Education Task Force.	Improve understanding of the regulations.
Water	Stormwater	On-Going	For about the past 10 years, DEP has used federal grants to fund this program (at the Stormwater Management Academy at the University of Central Florida) which is aimed at developing, collecting and making available a variety of educational materials to assist the local governments holding MS4 permits with meeting their educational requirements.	Improve compliance.
Water	Stormwater	Quarterly	NPDES MS4 Webinars. Staff will be conducting quarterly webinars to assist the MS4 permit holders with meeting their permit requirements.	Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.
Waste	Cleanup	On-Going	Information Packet for State Funded Petroleum Cleanup. The Division is developing an information packet for Responsible Parties for facilities eligible for state funded petroleum cleanups to inform them about the contractor designation process, performance based cleanups, closure options, etc. The focus is on closing more sites quicker and educating site owners about the various options to achieve this goal.	Improve DEP visibility and access in the business community. Improve Compliance.

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			Training in Florida's Siting Acts.	Improve understanding of the regulations.
Air	Siting Office	As Requested	Presentations related to the Siting acts are provided as a webinar or in person, as requested.	
Air	Small Business Program	As Requested	Small Business Assistance. The Division maintains a website to assist small businesses. The site included information regarding registration worksheets, rules & regulations, general information, etc. The Division also has a hotline and email address to assist small businesses with their questions.	Improve communication between the DEP and businesses. Improve understanding of the regulations. Improve compliance. Improve DEP visibility and access in the small business community.
Water	Drinking Water & Wastewater	On-Going	Area Wide Optimization Program (AWOP). AWOP is a program aimed at evaluating Water Treatment Plants and educating operators and management on strategies for optimizing their processes.	Improve DEP visibility and access in the business community. Improve Compliance.
Water	Drinking Water & Wastewater	On-Going	Florida Rural Water Association Technical Assistance. DEP partners with the FRWA to: (1) provide training on Florida's water and wastewater regulations and rule requirements, (2) assist operators of small systems to ensure they stay in compliance with drinking water standards, (3) to prepare Department permitting applications and Ioan applications for federal funding, and (4) ensure there are sufficient competent operators for manning of treatment plants.	Improve understanding of the regulations. Improve compliance.

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SD	Executive Direction	October 2011 – April 2012	Community Events. During the next six months, the SD will be present at community fairs for a free display area to increase public awareness of DEP's great work in "getting the water right" and increasing the awareness of our beautiful state parks and the economic value of day or weekend trips to one.	Improve communication between the DEP and citizens. Improve DEP visibility and access to citizens. Improve understanding of the regulations.
SD	Executive Direction	On-Going	Community Stakeholder Meetings. The SD will be reaching out to community stakeholders to meet with them and become active with the various environmental conservation groups or clubs in the SD. The District's goal is to demonstrate that DEP is working at protecting Florida's environment with regulatory processes that our consistence. This will allow us to be more proactive in learning what their current issues are and create a plan of action by asking the groups or clubs with a particular issue if would they like a speaker to talk about it (issue) from either a scientific or regulatory bases.	Improve communication between the DEP and stakeholders. Improve DEP visibility and access to stakeholders. Improve understanding of the regulations.
SED	Tanks	As Requested	Storage Tanks/Petroleum Contamination Presentations. At the request of industry, presentations are given to educate them on our compliance and enforcement policies and procedures. For the last few years, we have given presentations for the National Institute for Storage Tank Management (NISTM) at their Annual West Palm Beach Conference at the Crowne Plaza Hotel on Belvedere Road. A presentation at the conference is planned this year in October.	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.
SED	Hazardous Waste	2011 – 2012 FY	Hazardous Waste Outreach. This fiscal year, the SED will be focusing on the following outreach initiatives related to hazardous waste regulations: Expanding the variety of compliance assistance tools available to Florida small businesses to familiarize them	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance.

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			<ul> <li>with the RCRA regulations and improve their compliance.</li> <li>SED committed to a minimum of 100 Compliance Assistance Site Visit (CASV) inspections. This includes DEP's agreement to conduct follow up Compliance Evaluation Inspections (CEIs) within 120 days after the CASV is conducted.</li> <li>DEP intends to increase the number of counties participating in this enhanced compliance assistance effort; and improve the capability of current partnerships through improved data management sharing; by conducting joint training inspections and workshops.</li> </ul>	Improve understanding of the regulations.
			Schools Chemical Clean-Out Campaign. Schools Chemical Clean-Out Campaign (SC3), in	Improve DEP visibility and access in the business community.
SED			operation since 2005, has created chemically safer school environments in which chemicals are purchased	Improve Compliance.
	Hazardous Waste	On-Going	wisely, stored safely, handled by trained personnel, used responsibly, and disposed of properly. DEP educates teachers and staff on proper handling, storage, and disposal of hazardous chemicals and identification of potentially dangerous chemicals that should not be present or used.	Improve understanding of the regulations.
			Marine Contractors Workshops. The SED holds annual marine contractor workshops	Improve communication between the DEP and businesses.
SED	ERP	Annual	where they provide presentations on permitting and state lands issues, mitigation, etc. This past year they also held local government workshops within all of our	Improve DEP visibility and access in the business community.
			counties to review DEP's rules and jurisdiction and also roll out the new self certification website.	Improve Compliance. Improve understanding of the regulations.
			Outreach to Key Industry.	Improve communication between the DEP and businesses.
Air	Permitting &	New Initiative	The Office of Permitting & Compliance is now organized into three industrial groups: Chemicals & Combustion, Minerals & Metals, and Power Plants. Staff is directly	Improve understanding of the regulations.
	Compliance		contacting personnel at regulated industries to describe the reorganization and establish a key contact within	Improve compliance.
			the Office.	Provide a single point of contact for customers.

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SWD	Executive Direction	On-Going	<b>Establish a New Business Initiative.</b> Setting up seminars for new businesses that may have permitting questions. Allowing access to the SWD permitting staff in the various programs. This would also serve as an opportunity to drive the importance of compliance and educate those who may not be familiar with our rules.	Improve communication between the DEP and new businesses. Improve understanding of the regulations. Improve compliance throughout the SWD. Improve DEP visibility and access in the business community.
SWÐ	Executive Direction	6 times per year	Host Open House for Stakeholders. Director hosts a bi-monthly "open house" and each event hosts a different set of stakeholders. Examples of stakeholder groups: consultants, local grassroots environmental groups, etc.	Improve communication between the DEP and environmental stakeholders. Improve understanding of the regulations.
SWD		On-Going	Host Compliance Workshops. The SWD would look to identify trends in enforcement and target groups/areas that have non-compliance issues. Compliance workshops would be hosted by the SWD for these targeted industries.	Improve communication between the DEP and businesses. Improve understanding of the regulations. Improve compliance throughout the SWD. Improve DEP visibility and access in the business community.
SD	Executive Direction	On-Going	Business Support Strategic Plan.         The SD working with Economic Development Offices,         Small Business Development Centers and local Chamber         of Commerce to help streamline environmental         permitting for business growth. Other goals include:         – Increase awareness of Brownfield locations         – Increase awareness of DEP's proactive business         stance         – Attend regional business to business expos	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.

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			Florida Marine Contractors Association Workshops.	Improve communication between the DEP and businesses.
CD	ÉRP	On-Going	The CD is partnering with the Florida Marine Contractors Association and has conducted two workshops for marine contractors. The workshops featured agencies with overlapping jurisdiction,	Improve DEP visibility and access in the business community.
			including the Army Corps of Engineers, Florida Fish & Wildlife Conservation Commission, US Fish & Wildlife and Orange County EPD.	Improve Compliance. Improve understanding of the regulations.
			Marine/Boating Industry Outreach.	Improve communication between the DEP and businesses.
CD			The CD provides continuous outreach to the boating and marine industry in Central Florida, routinely	Improve DEP visibility and access in the
ĊĎ	ERP	On-Going	conducting site visits, compliance assistance, workshops, and presentations to marinas, boatyards, and others in the industry.	business community. Improve Compliance.
		-		Improve understanding of the regulations.
			Establish Legislative Relationships. In an effort to re-establish relationships with legacy	Increase communication.
SWD			lawmakers, as well as newly elected officials, the SWD director will visit with each legislator that frequently	Generate positive media coverage.
			interacts with the SWD.	Establish relationships.
	Executive Direction	Quarterly	Following those meetings:	Improve understanding of the regulations.
-			<ul> <li>Quarterly newsletter emailed to legislators.</li> <li>Host Legislative Workshops for overviews of the SWD's responsibilities.</li> <li>Coordinate Director/Legislator Workdays.</li> </ul>	

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CD	Hazardous Waste	On-Going	Florida Green Yards Program. CD staff conducts countless compliance assistance site visits to auto recyclers in the district, educating salvage yard owners and operators while improving compliance rates. This program has been adopted by the Hillsborough County EPD.	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.
CD	Hazardous Waste	Quarterly	SQG Roundtable. The Hazardous Waste program meets quarterly in an "SQG Roundtable" involving numerous local agencies, including county governments, to discuss potential/current compliance/enforcement issues, new rules, and problem solving. Seminole County has instituted a Task Force which achieves the same goal on a smaller scale; just one county and multiple local agency representatives within the County attend.	Improve understanding of the regulations. Improve communication between the DEP local governments. Improve Compliance. Improve understanding of the regulations.
CD	ERP	On-Going	Onsite Mitigation Project. ERP staff began a new project in January of 2011 centering on compliance, with an important outreach component. The goals of the project are to influence permittees to do their onsite mitigation plantings (to offset their other impacts and to ensure no net loss of wetland function) and to improve chances of compliance when we make our compliance visits. Initially 30 permittees who chose to do onsite mitigation planting as part of their permit from DEP were selected. Staff made phone calls or sent letters to each of them to advise that the planting was important, DEP would be coming to check their work, and would gladly provide them personal, onsite assistance if they needed help understanding or planning their mitigation. We offered the services of our top wetland expert if they needed assistance in planning their mitigation planting. Our staff has already made a difference by leveraging a low-intensity phone call to assist the regulated community and improve compliance rates.	Improve Compliance. Improve understanding of the regulations.

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			Metropolitan Environmental Training Alliance.	Improve Compliance.
CD	Executive Direction	On-Going	For years, the CD has leveraged enforcement into education. The Metropolitan Training Alliance was started by the CD as a constructive alternative to standard enforcement. It is now a non-profit organization run "on its own steam" for over 10 years providing environmental training to businesses and citizens around Orlando. METRA's goal is to provide low or no-cost training to small businesses and other entities that usually do not have environmental staff on site. Because of its diverse membership, METRA is able to develop training specific to a wide variety of industries. More than 3,000 individuals have been trained by METRA.	Improve understanding of the regulations.
CD	Water	On-Going	Trinking Water, Wastewater, Biosolids Workshops. For the past five years, the CD has conducted workshops aimed at increasing compliance in various industries regulated by our Water Facilities program. These include Drinking Water, Wastewater, and Biosolids (residuals). All workshops were assembled and presented by Central District staff in an effort to increase compliance in the specific areas. Continuing Education Units (CEUs) were offered for most workshops. The District has hosted more than twenty- five workshops during the past five years.	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.
CD	Hazardous Waste	On-Going	Hazardous Waste Initiatives. Hazardous Waste participates in diverse outreach and compliance assistance activities, ranging from targeted, industry-specific compliance assistance endeavors to presentations at large and small conferences and workshops, such as the Florida Veterinary Association, the Tupperware Environmental Conference, and the METRA Medical Workshop. Hazardous Waste staff organizes HAZWOPER refresher courses for district employees as well as other governmental agency staff.	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.

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NED	Hazardous Waste Section	3 – 5 per year	Major Industry Training - To provide industry-specific training on hazardous waste, used oil, universal waste regulations, and the DEP inspection and enforcement processes to large businesses such as the First Coast Manufactures' Association (FCMA), Camp Blanding, and the Jacksonville Aviation Authority (JAA).	Improve communication between the DE and large businesses. Improve understanding of the regulations Improve compliance throughout the NED Improve DEP visibility and access in the business community.
NED	Hazardous Waste Section	2 – 4 per year	<b>Environmental Professionals Training -</b> To provide training on hazardous waste, used oil, universal waste regulations, and the DEP inspection and enforcement processes to environmental professionals such as UF Law School students and Certified Hazardous Material Managers (CHMMs).	Improve communication between the DE and environmental professionals. Improve understanding of the regulations
NED	Potable Water	110	<b>Potable Water Facilities</b> - Train and/or verify correct bacteriological sample collection methods by PWS samplers.	Reduce number of false positives. Increase SQR Compliance rate.
NED	Wastewater Permitting	28	Wastewater Facilities – Provide pre-permit application review and post-permit issuance training for domestic and industrial wastewater facilities.	Reduction in RAIs. Reduction in time in-house for permits. Increase compliance rates. Increase communication.
NED	Wastewater Compliance & Enforcement	23	Wastewater Operator Training – As part of the compliance assistance efforts, general and violation based training is provided to increase knowledge of the regulatory conditions in wastewater permits.	Reduction in SNC. Increase compliance rates. Improve understanding of regulations. Increase communication.

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NED	Waste Program	4 per year	Navy Partnering - Quarterly meetings (four Naval commands and three Government agencies) to discuss environmental issues of concern to the Naval facilities in the NED.	Reducing costs and incidence of corrective actions when unknowing structures and fill that violate Statutes must be removed, as well as avoiding enforcement costs. Improve communication between the DEP and military facilities. Improve environmental compliance at military facilities.
, NED	Hazardous Waste Section	4 per year	NED SQG Roundtable Meetings – To educate County inspectors by discussing new regulations, present case studies of specific types of industries, and answer questions and concerns of the county inspectors.	Train County inspectors to leverage DEP's limited resources. Improve communication with DEP and County SQG inspectors. Improve compliance with hazardous waste and used oil regulations throughout the NED.
NED	Hazardous Waste Section	4 - 6 per year	County Sponsored Hazardous Waste Workshops – To provide training to businesses on hazardous waste, used oil and universal waste regulations.	Improve communication between the DEP and small businesses. Improve understanding of the regulations. Improve compliance throughout the NED. Improve DEP visibility and access in the business community.
NED	Hazardous Waste Section	6 – 10 per year	Hazardous Waste Training at the Northeast Florida Safety Council – To provide training to consultants and facility representatives on the hazardous waste, used oil, and universal waste regulations on a continuing basis.	Improve communication between the DEP and businesses and consultants. Improve understanding of the regulations. Improve environmental compliance throughout the NED. Improve DEP visibility and access in the business community.

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District/Division	Section	Number of Events	Туре	Desired Outcomes
NWD	Drinking Water	12 per year	Consumer Confidence Reporting Help Sessions. The NWD hosts 3 half day sessions per month in January, February, March and April. Community water systems are invited to attend. Before the help session, we download the individual system's data and have it available for them to use in the help session. At the help session they input the data in the CCR template with our assistance. When the system representative leaves, the CCR is complete.	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.
NWD	Air	As Requested	Asbestos Renovation and Demolition Activity Presentations. The NWD conducts asbestos presentations, as requested. The District also has an informational	Improve Compliance. Improve understanding of the regulations.
			summary concerning asbestos abatement, renovations and demolitions that they send out to the public when they receive questions.	
NED	ERP	4 per year	Real Estate Professionals and the Northeast Florida Association of Realtors (NEFAR) – Provide sufficient information to homeowners, through their realtors, to avoid dock or wetland violations.	Reducing costs and incidence of corrective actions when unknowing structures and fill that violate Statutes must be removed, as well as avoiding enforcement costs.
NED	ERP	2 per year	Marine Contractors and the Florida Marine Contractors Association – Provide permitting education for marine construction professionals.	Create the conditions necessary for fast permit processing and knowledgeable industry representatives best able to provide service for their clients.
NED	ERP	4 per year	<b>County Building Inspectors –</b> Assist building inspectors complete wetlands fill and dock construction concurrency reviews for compliance with the Florida Building Code and Federal Law under the National Flood Insurance Program (NFIP).	Reducing costs and incidence of corrective actions when unknowing structures and fill that violate Statutes must be removed, as well as avoiding enforcement costs. Avoid duplicative permitting processes for
				property owners seeking authorization for building construction from multiple agencies.
NED	ËRP	2 per year	<b>County Health Departments</b> – Education and coordination with DOH Onsite Sewerage Treatment Device System (OSTDS) inspectors on the identification of wetlands.	Avoid duplicative permitting processes for property owners seeking authorization for building construction from multiple agencies.

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Waste	Solid Waste	On-Going	Solid Waste Webinars. The Division has begun hosting webinars with regulated industry, stakeholders and DEP District solid waste staff to discuss emerging issues in the Solid Waste Program and get feedback.	Improve communication between the DEP and businesses. Improve DEP visibility and access in the business community. Improve Compliance. Improve understanding of the regulations.
DEAR		On-Going	Green Industries Best Management Program. The Green Industries Best Management Program (BMP) program is targeted at those persons required by statute to obtain certification in the application of fertilizers and pesticides. Certain applicators are required to be certified by 2013 and are regulated by a DACS commercial application license.	Improve Compliance. Improve understanding of the regulations.
DEAR		On-Going	Sediment and Erosion Control Course. The Sediment and erosion control course is targeted at persons in the construction industry with the goal of assisting them in their efforts to comply with the BMP maintenance and inspection requirements outlined in the NPDES construction generic permit.	Improve Compliance. Improve understanding of the regulations.

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