Independent Review Panel

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Gideon Kracov, J.D., *Chair*
Mike Vizzier, *Vice Chair*
Dr. Arezoo Campbell, *Member*

Edmund G. Brown Jr. Governor

01/28/2016

Governor Edmund G. Brown, Jr.
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown,

The enclosed Report is submitted pursuant to Health and Safety Code Section 57014(f). Within, are the Independent Review Panel's initial recommendations to the Governor, the Legislature, or the Department of Toxic Substances Control in relation to the Department's budget, permitting, enforcement, public outreach, and fiscal management.

An electronic copy of the Report can be viewed at:
https://www.dtsc.ca.gov/GetInvolved/ReviewPanel/IRPReports.cfm

If you have any questions, please contact Erik Erreca at (916) 324-1819 or e-mail him at erik.erreca@dtsc.ca.gov.

Sincerely,

Erik A. Erreca (on behalf of Gideon Kracov, Chair)
Independent Review Panel

Enclosures

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INITIAL REPORT TO THE GOVERNOR AND THE LEGISLATURE PURSUANT TO HEALTH AND SAFETY CODE SECTION 57014(F)

JANUARY 28, 2016

EPA-R9-2016-005534-0028137

Executive Summary

In 2015, Senate Bill 83 established the Independent Review Panel (IRP) within the Department of Toxic Substances Control (DTSC). The IRP is comprised of three members tasked with reviewing and making recommendations regarding improvements to DTSC's permitting, enforcement, public outreach, and fiscal management, pursuant to Health and Safety Code section 57014. The IRP also shall make recommendations for improving DTSC programs.

The Statute includes a reporting requirement for the IRP. Subsection 57014(f) of the Health and Safety Code requires the IRP to report to the Governor and the Legislature, 90 days after the IRP is initially appointed and every 90 days thereafter. These reports are to detail DTSC's progress in reducing permitting and enforcement backlogs, improving public outreach, and improving fiscal management. As the last IRP member was appointed on October 30, 2015, the initial subsection (f) report is due on January 28, 2016.

To date, the IRP has conducted six days of agendized public meetings, where the DTSC made various presentations to the IRP on its programs and budget, and where the IRP received extensive stakeholder comment on the topics under its jurisdiction. Recently, the IRP completed hiring its staff [Health and Safety Code § 57014(g) authorizes 2.0 staff positions for the IRP]. The IRP intends to soon finalize its Workplan, including regular meetings throughout the State to take robust public comment.

This Report is the IRP's initial subsection (f) report. The content of this Report was discussed and approved at the IRP's agendized January 14, 2016 meeting, after taking public comments. While the IRP's efforts are just beginning, the IRP believes that this initial Report is a good framework for its work, in compliance with Senate Bill 83. This Report includes narrative, recommendations and data requests to DTSC in areas including: budget, permitting, enforcement, public outreach, and fiscal management. The recommendations contained herein are directed either to the Governor and the Legislature, or to the DTSC, as specifically identified in the Report.

Throughout 2016 and until its sunset on January 1, 2018, the IRP will issue additional reports every 90 days, as required by the Statute. These reports will include additional, more detailed review of the DTSC's performance and backlogs, additional recommendations, and follow-up on the recommendations and data requests that are made in this initial Report.

The IRP looks forward to working with all stakeholders, including the Governor, the Legislature and the DTSC, in furtherance of its statutory mission.

All IRP activities are made available on its webpage at:
http://www.dtsc.ca.gov/GetInvolved/ReviewPanel/Independent-Review-Panel.cfm.

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Budget - Health & Safety Code §§ 57014(d) and (h)

Subsections 57014(a) and (h) of the Health and Safety Code require the IRP to review and make recommendations regarding improvements to the DTSC's "programs," and to submit a report timed with the release of the Governor's 2016-2017 Budget.

Budgets set priorities, and the IRP strongly feels that the DTSC's budget is an important topic for review. For example, in light of cost-recovery concerns at the DTSC, in 2014-15 the Governor and the Legislature approved 14.0 limited-term cost recovery staff positions at the DTSC (those positions will expire on June 30, 2016). So too, in 2015, the Governor and the Legislature approved and funded an important new position at DTSC – the Assistant Director for Environmental Justice and Tribal Affairs, whose primary responsibility is to ensure that the DTSC protects communities most burdened by pollution, and those most vulnerable to its effects.

For the DTSC, the Governor's 2016-2017 Budget Proposal proposes a total of $217.5 million (all funds) and 889.8 positions. The major proposed changes to the DTSC's budget include:

-An increase of $1.167 million and 8.0 permanent positions from the Hazardous Waste Control Account (HWCA) to ensure timely permitting actions and to help improve the clarity, consistency, protectiveness and enforceability of the permits issued.

-An increase of $.180 million and 2.0 permanent positions from the Toxic Substances Control Account (TSCA) and $.020 million from HWCA to implement Assembly Bill (AB) 276 (ESTM Committee). AB 276 allows the DTSC to require a potentially responsible party to provide information regarding the party's ability to pay for a response action at a site where there has been, or may be, a release of hazardous waste, hazardous substances, or hazardous materials in the environment.

-An increase of $.370 million from the HWCA to implement Senate Bill (SB) 162 (Galgiani) related to the management of treated wood waste. This bill provides the DTSC an additional six months to complete a comprehensive evaluation and report with specified content on the compliance with and implementation of laws relating to treated wood waste.

-An increase of $.350 million from the TSCA and extends for two additional years the 2.0 limited term positions established in fiscal year 2014-15 to provide consistency and stability in the Biomonitoring California Program.

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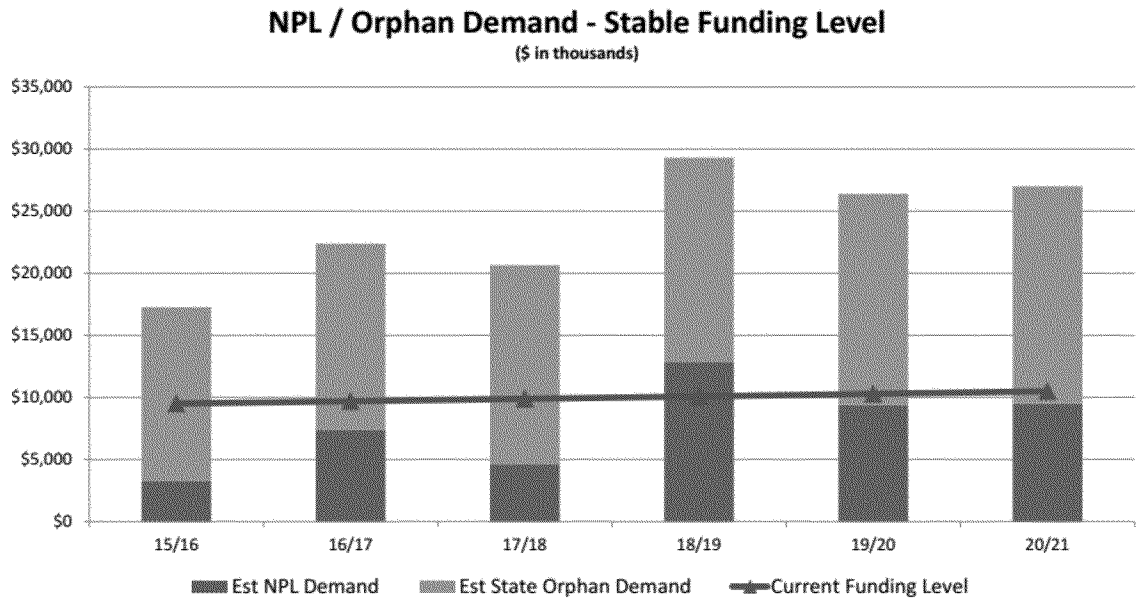
-An increase of $.025 million from the HWCA and $.025 million from the TSCA to provide funding to for the Attorney General to provide legal support to the IRP. This funding and Attorney General support are critical to the IRP's proper functioning in compliance with all legal requirements.

The IRP also wants to highlight for the Governor and the Legislature projected shortfalls in the DTSC's Site Remediation Account (SRA). The DTSC currently spends approximately $10 million per year from the SRA for both: a) California's operations and maintenance oversight obligations at federal Superfund National Priority List (NPL) sites and b) California orphan site clean-ups where there is no responsible party to pay for clean-up.

The IRP is concerned that this $10 million annual allocation in the SRA is insufficient, since the State's NPL obligations are projected to grow as more sites are turned over to California to assume operations and maintenance oversight obligations. In fact, by Fiscal Year 2020-2021, there is a concern that no SRA funds will be available for orphan sites, even though those sites impact groundwater or release toxic vapors from underground contamination into occupied buildings:



*Excludes legacy landfills.

IRP Recommendations to the Governor and Legislature on the DTSC's 2016-2017 Budget:

Support the Governor's 2016-2017 Budget Proposal for DTSC.

Increase the DTSC's SRA funding to address the projected shortfall for orphan site cleanup and transition of federal sites to State operations and maintenance oversight.

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Provide position authority and funding to DTSC to maintain the 14.0 limited-term cost recovery staff positions through 2018, or make them permanent.

Provide position authority and funding to strengthen the role of the Assistant Director for Environmental Justice and Tribal Affairs, including more staffing and resources.

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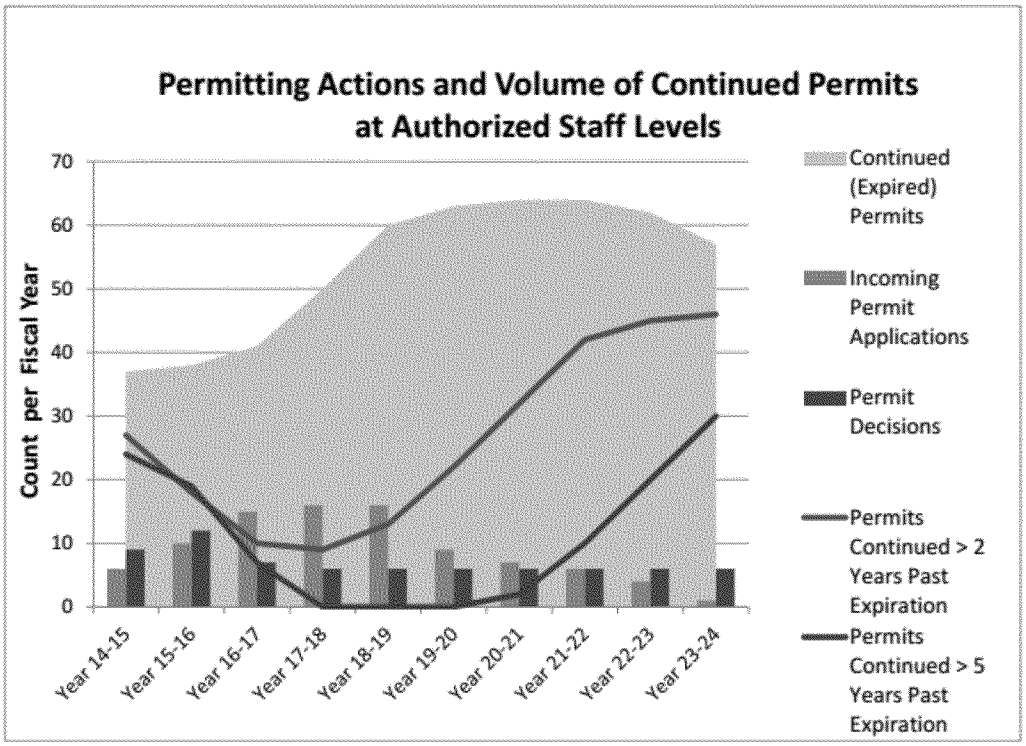
Permitting - Health & Safety Code §§ 57014(a), (d) and (f)

Subsections 57014(a) and (f) of the Health and Safety Code require the IRP to review and make recommendations regarding improvements to the DTSC's permitting, and to report to the Governor and the Legislature on permitting backlogs.

The DTSC's Office of Permitting is responsible for administering the Hazardous Waste Facility Permitting Program established under Chapter 6.5 of California Health and Safety Code, and Resource Conservation and Recovery Act (RCRA) authorization. The core activities of Permitting include: review of RCRA and non-RCRA Hazardous Waste Facility Permit applications to ensure safe design and operation; issuance/denial of operating permits; issuance of post closure permits; approval/denial of permit modifications; issuance/denial of emergency permits; review and approval of closure plans; provide closure oversight of approved closure plans; issuance/denial of variances; provide assistance to regulated industry on permitting matters; and provide for public involvement provide assistance to the enforcement program on issues related to permitted facilities and provide assistance to collect permitting fees.

The DTSC permits 119 facilities with 127 Hazardous Waste Facility Permits. However, lengthy delays in permit decisions have resulted in a backlog of pending renewal applications. As many as 20 permits are identified as backlogged in FY 14-15, *ie*, permits operating on "continued status" for more than 5 years past expiration. This backlog is a great concern to the IRP. The DTSC estimates future backlog as follows:



To help address the backlog, in early 2014, the DTSC developed a Permitting Enhancement Work Plan (Work Plan) to significantly upgrade and strengthen the Department's permitting program and to ensure that the problems of the past do not resurface in the future. The Work Plan serves as a comprehensive roadmap to guide the DTSC's efforts to improve the permitting program's ability to issue protective, timely, and enforceable permits using more transparent standards and consistent procedures. The Department received $699,000 and 5.0 limited-term positions to implement this Work Plan as part of its FY 14-15 budget and has committed to complete the Work Plan by June 30, 2016.

Currently, the Permitting Division has a total of 49.5 positions. There are 8.0 management positions: 1.0 Division Chief, 2.0 Branch Chiefs and 5.0 supervisors. There are 7.0 administrative support positions: 5.0 office technicians and 2.0 program analysts. There are 34.5 technical staff including permit writer positions.

Also, new legislation, SB 673 (Lara) requires the DTSC, by January 1, 2018, to establish or update criteria for use in determining whether to issue a new or modified hazardous waste facilities permit or a renewal of a hazardous waste facilities permit, and to develop and implement, by July 1, 2018, programmatic reforms designed to improve the protectiveness, timeliness, legal defensibility, and enforceability of the department's permitting program. So too, AB 1075 (Alejo) requires DTSC to consider certain violations of specified environmental laws as cause to deny, suspend, or revoke a permit.

IRP Recommendations to the Governor and Legislature to Improve Permitting:

Require that the DTSC require as part of Hazardous Waste Facility Permits that adequate financial assurances be set aside for corrective action for existing hazardous waste releases at the site, not only for post-closure equipment decommissioning. Investigate whether current Health and Safety Code §§ 25200.10(b) and 25245 *et seq*. should be amended to ensure that adequate financial assurances be set aside during Hazardous Waste Facility Permit issuance to pay for corrective action for existing hazardous waste releases at the sites that the DTSC is permitting. This is consistent with the April 2006 Legislative Analyst Office Report "Financial Assurances: Strengthening Public Safety of Waste Facilities and Surface Mines." *See* https://www.dtsc.ca.gov/GetInvolved/ReviewPanel/upload/LAOsite_assurances_April-2006.pdf

Consider whether to create a Permit Appeals Board to hear, and decide on all Hazardous Waste Facility Permits that the DTSC does not timely process within 3 years of expiration. Consider whether establishing such a Permit Appeals Board would increase transparency and reduce backlogs. A possible legislative vehicle for this could be pending SB 654 (De Leon).

Require that the DTSC obtain full cost recovery connected with its Hazardous Waste Facility Permit decisions. The DTSC reports that the DTSC's existing Health Safety Code § 25205.7(d) fee collection for permitting statute does not ensure that it achieves full cost recovery connected with its Hazardous Waste Facility Permit actions.

Fund Technical Assistance Grants to allow public participation before a draft Hazardous Waste Facility Permit is prepared. This can assist in transparency of permitting decisions, and allow community questions and concerns to be raised early in the process.

IRP Recommendations to the DTSC to Improve Permitting:

Publish by 1/1/17 draft SB 673 Regulations and adopt by 1/1/18.

Adopt guidance or publish draft regulations by 1/1/17 on its permit Violation Scoring Procedure (VSP).

IRP Data Requests to the DTSC re: Permitting:

IRP requests that the DTSC produce, by 3/1/16, a list of existing financial assurances for every Hazardous Waste Facility Permit site.

IRP requests that the DTSC produce, by 4/1/16, a list of how many Hazardous Waste Facility Permit permitees now fall within AB 1075's violation categories, with specifics.

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Enforcement - Health & Safety Code §§ 57014(a), (d) and (f)

Subsections 57014(a), (d) and (f) of the Health and Safety Code require the IRP to review and make recommendations regarding improvements to the DTSC's enforcement and the DTSC's "programs," and to report to the Governor and the Legislature on enforcement backlogs.

The DTSC enforces California's Hazardous Waste Control Law by monitoring hazardous waste transfer, storage, treatment, and disposal, and taking appropriate action against violators.

The DTSC enforcement program consists of two divisions in the Hazardous Waste Management Program responsible for enforcing hazardous waste laws, the Enforcement and Emergency Response Division (EERD) and the Office of Criminal Investigations (OCI). In addition to enforcing hazardous waste laws, DTSC's enforcement program conducts emergency response removal actions and provides support to DTSC's Permitting Division.

EERD has 113.0 authorized positions consisting primarily of environmental scientists, 82.0 of which are field certified. There are an additional six environmental scientists that provide emergency response support. OCI has 33.0 authorized positions including 15.0 sworn criminal investigators and 15.0 environmental scientists, including the branch chief. Both groups have support staff such as office technicians and analysts.

The DTSC is also responsible for enforcing cleanup of toxic sites, laws concerning toxics in packaging, bans on toxic substances in consumer products, and ensuring proper disposal of universal wastes which include hazardous wastes that are widely produced by households and many types of businesses, such as electronic waste. In the future, the DTSC will enforce the requirements of the Safer Consumer Products program.

The DTSC's enforcement program is responsible for conducting routine and targeted compliance inspections, and civil and criminal investigations. The DTSC conducts regular, routine compliance inspections of facilities with Hazardous Waste Facility Permits. This includes reviewing submitted data and reports, periodic physical observation, and testing and evaluation of facilities.

The DTSC also conducts investigations in response to complaints from the public and anonymous sources received through the CalEPA complaint system and the DTSC Hazardous Waste Alert Hotline. Depending on the nature of the complaint, the DTSC may investigate the complaint or refer the complaint to a Certified Unified Program Agency (CUPA) or the appropriate local, state, or federal agency.

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The DTSC documents the results of its inspections and investigations in reports. These reports are compiled in the Envirostor database, which allows the public to access information about environmental cleanups and permitted facilities in their communities. While the public has access to much of the information in Envirostor, this database is difficult to navigate.

When an inspection or investigation shows violations of the law, regulation, permit, or other binding requirement, the DTSC issues a Summary of Violations. The Summary of Violations describes the type of each violation identified, and is the first step in the enforcement process. Depending on the nature of the violation discovered, the violation may be resolved criminally, civilly, or administratively. The resolution may consist of the DTSC issuing an administrative order to the violator, a consent order, or taking other actions tracked as enforcement actions, such as issuing an Imminent and Substantial Endangerment Order or an order to suspend a facility's operations.

In order to better understand and prioritize work to benefit EJ communities, the DTSC is making use of the CalEnviroScreen tool, which is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. This is just one tool being used in the development of an enhanced review process for EJ communities.

Currently, the DTSC is participating in a CalEPA Environmental Justice Enforcement Initiative, which focuses on specific communities that contain multiple sources of pollution and are disproportionately vulnerable to the effects of such pollution. This initiative enhances communication with community members and EJ considerations in compliance and enforcement. Last year's pilot took place in Fresno, and an LA initiative in Boyle Heights and Pacoima is currently underway.

In April 2013, the DTSC published a "Fixing the Foundation," a comprehensive plan to improve its performance. As part of "Fixing the Foundation," the DTSC 's Hazardous Waste Management program goals include to: make the enforcement program's information and processes more accessible to the public; establish priorities for the enforcement program; help to ensure that CUPAs properly and effectively implement the hazardous waste program; and share publically available Hazardous Waste Facility Permit facility enforcement data through the EnviroStor public web site. As part of this, the DTSC is now undertaking its Improving Enforcement Performance Initiative. The Initiative identifies five goals to improve the enforcement program and the DTSC is developing a work plan to implement them. Under this Initiative, the DTSC is to: 1) more clearly define the inspection and enforcement process; 2) create a formal review process for case management; 3) communicate how the inspections and enforcement processes work to stakeholders and the community, 4) engage the community to help set priorities; and 5) set clear metrics to evaluate and help strengthen the program.

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Recent law, AB 1071 (Atkins) requires all departments within the California Environmental Protection Agency to establish a policy on supplemental environmental projects that benefit disadvantaged communities.

AB 1329 (Perez) requires the DTSC to prioritize enforcement in communities that have been identified by the California Environmental Protection Agency as being the most impacted environmental justice communities.

SB 1249 (Hill) requires the DTSC to require the disposal of treated metal shredder waste to be regulated pursuant to the hazardous waste control laws, unless the DTSC adopts alternative managements standards.

IRP Recommendations to the DTSC to Improve Enforcement:

Adopt by 5/1/2016 an AB 1071-compliant Supplemental Environmental Projects policy.

Adopt by 1/1/2017 "Improving Enforcement Performance Initiative" Workplan.

IRP Data Requests to the DTSC re: Enforcement:

IRP requests that the DTSC produce, by 5/1/16, data on compliance with 65 day inspection report and 175 day return to compliance/referral requirements under Health & Safety Code § 25185(c), including data for every site from 2014-2015 on: inspections, violations, and enforcement outcomes.

IRP requests that the DTSC report, by 5/1/16, progress with data management goals from its USEPA/Cal DTSC 2015-2017 RCRA Grant Work Plan pp. 28-30.

IRP requests that the DTSC report, by 5/1/16, on how environmental justice and health risk is prioritized in enforcement under AB 1329, particularly Health & Safety Code § 25180.2, including identification of planned EJ enforcement initiatives.

IRP requests that the DTSC produce, by 5/1/16, data on "cases" created in EnvirStor for calendar years 2014 and 2015, including the number of referrals to the Attorney General, local District Attorney and City Attorney for prosecution.

IRP requests that the DTSC report, by 5/1/16, on SB 1249 regulatory status.

EPA-R9-2016-005534-0028147

Public Outreach - Health & Safety Code §§ 57014(a), (d) and (f)

Subsections 57014(a), (d) and (f) of the Health and Safety Code require the IRP to review and make recommendations regarding improvements to the DTSC's public outreach and the DTSC's "programs," and to report to the Governor and the Legislature.

Public participation is a cornerstone of the DTSC's work. Statute and policy mandate a community involvement program that creates a dialog with the public when the DTSC oversees a cleanup, reviews a permit application, or begins the rule making process. Moreover, the DTSC recognizes that meaningful public involvement ultimately results in better environmental risk management decisions.

The role of the Public Participation program is to ensure that communities' communication needs are met, and to advise project managers and technical staff interacting with the public. This process is well-defined in law and policy but varies in practice depending on the type of action being taken, the underlying authority used for DTSC action, and the community's communication needs.

The DTSC's Public Participation program has developed widely used guidance documents that outline program goals, roles and responsibilities, legal mandates, processes for decisions, and optional steps. These documents contain checklists and serve as a basis for training staff. They can be found at: www.dtsc.ca.gov/LawsRegsPolicies/Policies/PPP/PublicParticipationManual.cfm.

The DTSC's Public Participation program consists of 22.0 positions. Each position is included within DTSC's overall budget, amounting to about $1.5 million in personnel costs during the current fiscal year. In addition, the Program is allocated $46,000 for public notices, $8,500 for court reporting, $50,000 for a technical advisor on the Exide project, and $50,000 for translation services.

The DTSC established, based on new legislation, a new executive-level staff position, Assistant Director for Environmental Justice and Tribal Affairs. Since starting in July 2015, the Assistant Director has listened and learned about many concerns from EJ communities, and aims to facilitate increased and improved communication, ensure the department can improve actions at specific sites in communities, use those opportunities to identify systemic problems, and find and implement solutions. The Assistant Director has been working to develop a comprehensive EJ strategy for the department, which includes, 1) identifying any hidden biases and inequities in programs; 2) emphasizing and achieving frequent and ongoing community engagement; and 3) promoting problem solving and addressing of community concerns across the department's programs and its work.

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In 2014 and 2015, in furtherance of "Fixing the Foundation," the DTSC initiated a public participation modernization effort. It contracted with UC Davis to formally reach out with stakeholders and make recommendations for change. The recommendations will enhance outreach tools, processes, methods, and guidance, and will be submitted to the DTSC by Spring 2016.

In Winter 2015, e-mails from the DTSC staff were released in response to a Public Records Act request. The DTSC reviewed approximately 50,000 emails and identified dozens of derogatory, racist or otherwise inappropriate emails, including from certain staff named William Bosen and Theo Johnson. The DTSC reports that it will continue releasing emails as they become available after redacting sensitive information. The IRP finds these e-mails offensive and inappropriate. The IRP believes that the content of the e-mails, even though not widespread, can harm the relationship between the DTSC and the community if not appropriately responded to.

The DTSC Director Lee has reported that "as soon as the emails in question were discovered, we launched an internal investigation, brought in the Attorney General's Office to perform an additional, broader investigation and then took quick disciplinary action against these two individuals." At the January 13, 2016 IRP meeting, Director Lee presented on "what the Department has done and is doing to maximize transparency on these offensive emails" and "actions DTSC is taking to strengthen our commitment to supporting diversity and fostering cross-cultural understanding."

IRP Recommendations to the DTSC to Improve Public Outreach:

Start to implement, by 1/1/17, the UC Davis public participation work-plan.

Continue practice of bi-monthly EJ accountability calls, or an equivalent mechanism designed to increase the communication between the DTSC and the community.

Publish all CEQA notices in one tab on the DTSC website.

Publish all Hazardous Waste Facility Permits in one tab on the DTSC website.

Publish all public enforcement actions (orders, settlements) in one tab on the DTSC website.

Assign staff, immediately, charged with independent review, to revisit all cases in past 5 years of "No Further Action" that involve William Bosan or Theo Johnson, and report to the public by 6/1/16 on the findings.

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IRP Data Requests to the DTSC re: Public Outreach:

IRP requests that the DTSC report, by 6/1/16, on procedures for formal public feedback and evaluation of each public participation project and how such evaluation is used to evaluate and improve the overall public participation program.

IRP requests that the DTSC report, by 6/1/16, on public participation budget and staffing and language skills.

IRP requests that the DTSC report, by 6/1/16, with an update on the "actions DTSC is taking to strengthen our commitment to supporting diversity and fostering cross-cultural understanding."

EPA-R9-2016-005534-0028150

Fiscal Management - Health & Safety Code §§ 57014(a) and (f)

Subsections 57014(a) and (f) of the Health and Safety Code require the IRP to review and make recommendations regarding improvements to the DTSC's fiscal management, and to report to the Governor and the Legislature.

IRP believes that the DTSC is committed to fundamental reform in the way it recovers the costs incurred overseeing and investigating the cleanup of contaminated sites and costs incurred performing investigation and cleanup activities. The oversight, cleanup, and other costs incurred by the Department are collectively known as "response costs."

On May 31, 2013, the DTSC publicly disclosed that its unrecovered response costs were $184.5 million at 2,700 sites. This was for the 25-year period from July 1987 through December 2012. This amounts to about 10% of the total response costs during this period.

As requested by the Joint Legislative Audit Committee, the California State Auditor presented an audit report concerning the DTSC's process for recovering costs – Report 2013-122 "California Department of Toxic Substances Control: Its Lack of Diligence in Cost Recovery Has Contributed to Millions in Unbilled and Uncollected Costs." The Report contained numerous recommendations, including that the DTSC review and ensure the accuracy of its data before putting the information into the new Statewide Financial System for California, or Fi$cal.

In response, the DTSC formed a cost recovery team to make changes. In late 2013, the DTSC issued 27 departmental procedures consisting of 276 pages of guidance. In Spring 2014, more than 400 employees were trained on this guidance. Later in 2014, about 200 employees with primary cost recovery responsibilities received additional targeted training.

Also, to address cost-recovery concerns at DTSC, in 2014-15, the Governor and the Legislature approved 14.0 limited-term cost recovery staff positions (those positions will expire on June 30, 2016).

In December 2014, Fi$cal concluded it was unable to meet the DTSC's unique cost recovery billing system needs. This created a significant structural challenge and the DTSC is now moving forward within the state's IT approval process.

IRP Recommendations to the DTSC To Improve Fiscal Management:

DTSC should provide timely Health & Safety Code § 57007 Biennial Report by 1/1/17 and tie Report to DTSC "Fixing the Foundation," including documenting compliance with *all* goals and objectives therein.

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IRP Data Requests to the DTSC re: Fiscal Management:

IRP requests that the DTSC report, by 2/15/16, on status of Fi$cal implementation and billing status.

IRP requests that the DTSC report, by 9/1/16, on status of limited term cost recovery positions.

IRP requests that the DTSC produce, by 9/1/16, data on how much of its collections are billed and outstanding, in all DTSC areas/programs, and solutions to barriers.

IRP requests that the DTSC report, by 9/1/16, on goals and timelines on its internal Cost Recovery improvement programs including:
1) Sustainable Cost Recovery Systems
2) Audit Backlog Work Plan
3) Envirostor Enhancements to Improve Cost Recovery

IRP requests that the DTSC report, by 7/1/16, on any follow-up examination or comments by the California State Auditor on DTSC's cost recovery procedures and improvement efforts.

EPA-R9-2016-005534-0028152