

Fiscal Year 2011-2012 Work Plan

Enforcement Division  
Office of Environmental Compliance

July 1, 2011

The ED will meet its Operational Plan/Performance Indicator commitments by issuing appropriate and timely enforcement actions consistent within the prescribed timeframe.	For more information on this project, please contact:	Status/Updates:
	Celena J. Cage P: (225) 219-3712 E: <a href="mailto:Celena.Cage@la.gov">Celena.Cage@la.gov</a>	
Review and update, if necessary, Circuit Rider guidelines	For more information on this project, please contact:	Status/Updates:
	Cheryl Easley P: (225) 219-3713 E: <a href="mailto:Cheryl.Easley@la.gov">Cheryl.Easley@la.gov</a>	
Update the online BEP suggestion process	For more information on this project, please contact:	Status/Updates:
	Celena J. Cage P: (225) 219-3712 E: <a href="mailto:Celena.Cage@la.gov">Celena.Cage@la.gov</a>	
Reduce the number of water enforcement backlog referrals by thirty percent (30%) by issuance of the appropriate enforcement document (i.e., compliance order, notice of violation, no further action memo, etc.).	For more information on this project, please contact:	Status/Updates:
	Celena J. Cage P: (225) 219-3712 E: <a href="mailto:Celena.Cage@la.gov">Celena.Cage@la.gov</a>	
<b>Performance Partnership Grant (PPG) Commitments</b>		
The Enforcement Division (ED) will meet its PPG commitments, by achieving the following:		
Address and report high priority violations to EPA in a timely manner consistent with HPV policy and/or the Louisiana Revised Statutes	For more information on this project, please contact:	Status/Updates:
	Leigh Gauthreaux P: (225) 219-3712 E: <a href="mailto:Leigh.Gauthreaux@la.gov">Leigh.Gauthreaux@la.gov</a>	
Enter all required minimum data requirements (MDRs) into AFS consistent with the October 1, 2008 Source Compliance and State Action Reporting (SFB83 Supporting Statement)	For more information on this project, please contact:	Status/Updates:
	Leigh Gauthreaux P: (225) 219-3712 E: <a href="mailto:Leigh.Gauthreaux@la.gov">Leigh.Gauthreaux@la.gov</a>  or Misty Huffman P: (225) 219-3769 <a href="mailto:Misty.Huffman@la.gov">Misty.Huffman@la.gov</a>	

Implement the exit strategy for Refinery Initiative, as appropriate.	<b>For more information on this project, please contact:</b>	Status/Updates:
	Leigh Gauthreaux P: (225) 219-3712 E: <a href="mailto:Leigh.Gauthreaux@la.gov">Leigh.Gauthreaux@la.gov</a> or Richard Ober, Jr. P: (225) 219-3704 E: <a href="mailto:Richard.Ober@la.gov">Richard.Ober@la.gov</a>	
Enter all RCRA violations into RCRAInfo. Enter a facility's return to compliance status into RCRAInfo.	For more information on this project, please contact:	Status/Updates:
	Cheryl Easley P: (225) 219-3713 E: <a href="mailto:Cheryl.Easley@la.gov">Cheryl.Easley@la.gov</a>	
Identify and initiate enforcement action (This shall mean the facility has been placed under enforcement review. Enforcement action, which is considered under enforcement review, includes warning letters, phone calls, meetings, and referral for formal enforcement) for majors and 92-500 and significant minors for the following: effluent violations; inspection deficiencies; non-receipt of DMRs or required compliance schedule reports.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
Identify and initiate administrative close-out on final formal enforcement actions when a follow-up inspection or file review reveals that the facility is compliant with the action.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
Address violations from wet weather (CAFO/AFO, SSO, bypasses, storm water) through a targeting strategy that was developed by the Department in June 2005 and approved by EPA in February 2007.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
Issue formal administrative orders to return facility to compliance within 12 months of receiving a viable compliance schedule.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	

Review and process all 3 <sup>rd</sup> party notices of intent and Initiate action if CWA violations exist within 60 days of receipt of the notices.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
Where LDEQ has joint enforcement authority for Federal Consent Decrees, all DMRs, inspections, and enforcement data shall be entered into ICIS for agreed-upon facilities within 30 working days of receipt/issuance of the documents.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
Address violations at major facilities before the facility appears a second consecutive time as SNC on the QNCR.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
LDEQ will enter agreed-upon WENDB data elements for majors and 92-500's, and significant minors into ICIS in accordance with the PCS policy statement.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
LDEQ will enter all DMR data into EPA's ICIS database for majors and 92-500 minors, and significant minors within 30 working days of the DMRs.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
LDEQ will enter all warning letters and formal enforcement actions into ICIS for major, 92-500, and significant minor facilities within 30 working days from issuance of an enforcement action.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	
<b>Compliance Training</b>		
The ED will conduct a minimal of five (5) Sanitary Assistance Wastewater Training (SWAT) sessions.	For more information on this project, please contact:	Status/Updates:
	Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	

The ED will conduct a minimal of twelve (12) Underground Storage Tank training sessions.	For more information on this project, please contact: Cheryl Easley P: (225) 219-3713 E: <a href="mailto:Cheryl.Easley@la.gov">Cheryl.Easley@la.gov</a>	Status/Updates:
The ED will conduct a minimal of five (5) NetDMR Online Reporting trainings.	For more information on this project, please contact: Tyler Ginn P: (225) 219-3931 E: <a href="mailto:Tyler.Ginn@la.gov">Tyler.Ginn@la.gov</a>	Status/Updates:
The ED will continue to promote and assist municipalities to comply through the Municipal Sewage Assistance Program (MSAP); goal is to a minimal of twelve (12) municipalities enrolled in MSAP this year.	For more information on this project, please contact: Wayne Slater P: (225) 219-3729 E: <a href="mailto:Wayne.Slater@la.gov">Wayne.Slater@la.gov</a> or Joette Kenaley P: (225) 219-3778 E: <a href="mailto:Joette.Kenaley@la.gov">Joette.Kenaley@la.gov</a>	Status/Updates:
<b>Regional Enforcement Actions</b>		
The ED will implement the Regional Enforcement Actions Policy	For more information on this project, please contact: Celena J. Cage P: (225) 219-3712 E: <a href="mailto:Celena.Cage@la.gov">Celena.Cage@la.gov</a> or Kilren Vidrine P: (225) 219-3507 E: <a href="mailto:Kilren.Vidrine@la.gov">Kilren.Vidrine@la.gov</a>	Status/Updates:

<b>General Compliance Orders</b>		
The ED will review the feasibility of developing General Compliance Orders to coincide with selected General Permits	For more information on this project, please contact:	Status/Updates:
	Celena J. Cage P: (225) 219-3712 E: <a href="mailto:Celena.Cage@la.gov">Celena.Cage@la.gov</a>  or  Naz Zanjani-Bachar P: (225) 219-3722 E: <a href="mailto:Naz.Zanjani-Bachar@la.gov">Naz.Zanjani-Bachar@la.gov</a>	
<b>Regulation Development</b>		
The ED will modify the Expedited Penalty regulations to include additional violations	For more information on this project, please contact:	Status/Updates:
	Craig Easley P: (225) 219-3735 E: <a href="mailto:Craig.Easley@la.gov">Craig.Easley@la.gov</a>	
<b>Standard Operating Procedures</b>		
The ED will review and update all SOPs, at least biennially, post timely, and draft SOPs for processes where SOPs don't currently exist.	For more information on this project, please contact:	Status/Updates:
	Celena J. Cage P: (225) 219-3712 E: <a href="mailto:Celena.Cage@la.gov">Celena.Cage@la.gov</a>	