CORRESPONDENCE/MEMORANDUM

State of Wisconsin

Department of Natural Resources

Attachment IV

DATE: October 13, 1995 FILE REF:

TO: Bob Krill - WS/2

FROM: Solid Waste Management Section Unit Leaders DM, PH, GM, JC

SUBJECT: Plan Review Survey

As you know, on Tuesday October 10th we received results of the Plan Review Survey for the Solid Waste Management Program. We've looked over our results (as well as those for the Water Supply/Wastewater Survey) and found that they are very clear: further decentralization of plan review would be directly contrary to the wishes of our customers. Therefore, we believe that these results should be directly brought to the attention of the Secretary. A summary of the results is provided below:

1. Twelve of the 26 surveys we mailed were returned. Based on the consultants' responses regarding the number of clients they serve, these 12 respondents serve between 60% and 96+% of active landfill owners.

2. Only 2 of the 12 respondents favored further decentralization of solid waste plan review. Furthermore, of the 24 written comments which were submitted, 21 were strongly critical of further decentralization, only 2 were in favor of the idea, and 3 were neutral. We also noted that the respondents in your survey were equally decisive.

3. Regarding the importance of various aspects of plan review, the average responses were as follows (where 1 was not important and 5 was very important):

	Solid Waste	WS/WW
Timeliness	4.00	4.28
Consistency	3.91	4.07
Technical Expertise	3.67	3.95
Geographical Proximity to Review Staff	2.92	2.24

In both surveys, the order of importance of the various aspects was identical, and geographical proximity to DNR review staff was dead last by a significant margin. These results show that what matters most to the majority of each of our programs' respective customers are timeliness and consistency followed by technical expertise. There is no evidence indicating that timeliness would be improved through

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decentralized plan review, and much evidence from our own Agency demonstrating that consistency suffers with decentralized reviews.

As a final point, we'd like to mention that in meetings held during our code revision process this past summer, the topics of DNR's reorganization and decentralization of solid waste plan review specifically, were raised unilaterally by our Technical Advisory Committee. Representatives from Wisconsin Manufacturers and Commerce, the Wisconsin Paper Council, the Wisconsin Utilities Association, as well as Waste Management of Wisconsin, Browning Ferris, and Superior Services all strongly expressed their opposition to further decentralization of solid waste plan review. These firms and the members of listed organizations dispose of over 72% of all waste landfilled each year in Wisconsin.

In conclusion, we hope that you will be able to raise these issues directly with Secretary Meyer. We also hope that the written comments of our customers will also be reviewed carefully, since they closely parallel comments we raised in memos provided to top management during the early stages of Grant Thornton's work. We received no response to our memos and believe that our concerns may have been perceived as simply part of a turf battle. We're attaching a complete copy of our survey results including the comments received. We sincerely thank you for your assistance in this matter.

cc: George Meyer - AD/5
Paul Didier/Kevin Kessler - SW/3
Lakshmi Sridharan - SW/3
Susan Sylvester - AD/5
Jay Hockmuth - AD/5

PLAN REVIEW SURVEY
BUREAU OF SOLID & HAZARDOUS WASTE MANAGEMENT
DEPARTMENT OF NATURAL RESOURCES

September 1995

You may be aware that the Department of Natural Resources (DNR) is undertaking a major reorganization of its structure. One of the specific issues being evaluated is where the plan review functions of various programs should be located to best serve our customers. We solicit your firm's response to the following questions and invite any other comments that your firm may have on this issue.

Existing Situation

Currently, most landfill plan review as well as review of plans for complex, non-landfill solid waste facilities (municipal solid waste composting, petroleum contaminated soil biological treatment, and medical waste treatment facilities) is performed in the Central Office in Madison.

Options

- Continue to perform most landfill plan review as well as review of plans for complex, non-landfill solid waste facilities in the central office.

- Decentralize all solid waste plan review and the existing technical pool of engineers and hydrogeologists in the Solid Waste Management Section to Field Offices located throughout the state.

YOUR OPINION

1. Would your firm be in favor of decentralizing landfill plan review as well as review of complex non-landfill facilities?

___ yes ___ no

Please comment on why your firm favors or opposes this idea.

_____

_____

_____

_____

2. Please give us your score of the importance of each of these plan review aspects. Score each aspect from 1 (not important) to 5 (very important).

___ Consistency of code interpretations and reviews
___ Timeliness of reviews
___ Geographical proximity to DNR staff
___ Technical expertise of plan review staff

3. If you could improve one aspect of the current DNR plan review process which one of the following would you improve? (check one)

___ Consistency of code interpretations and reviews
___ Timeliness of reviews
___ Geographical proximity to DNR staff
___ Technical expertise of DNR staff
___ Other (Please list)

_____

_____

_____

_____

4. Are there other comments your firm would like to make regarding the locations at which plan reviews would be done?

_____

_____

_____

_____

5. How many landfill customers does your firm do business with?

___ 1 ___ 6 - 10 ___ 16+

___ 2 - 5 ___ 11 - 15

We apologize for the short survey turnaround time but the Department's decision on this matter will be made very soon.

Please return this survey <u>no later than October 6, 1995</u> to:

Ed Nelson
Bureau of Research
Wisconsin Department of Natural Resources
P.O. 7921
Madison, WI 53707-7921

or if possible,

Please FAX to Mr. Nelson at (608) 266-5226.

Bureau of Solid and Hazardous Waste Questionnaire

Question 1

Yes - 3 total
No - 8
?? - 1

Question 2

Consistency -
1 - 2 total
2 - 0
3 - 1
4 - 3
5 - 6

Timeliness -
1 - 0 total
2 - 0
3 - 5
4 - 2
5 - 5

Proximity -
1 - 1 total
2 - 5
3 - 1
4 - 4
5 - 1

Technical Expertise - 1 - 0 total
2 - 4
3 - 1
4 - 2
5 - 5

Question 3

Consistency - 1 total
Timeliness - 8
Proximity - 1
Technical Expertise - 1
Comments:
- All are adequate to excellent.
- The WDNR needs to simplify the process by concentrating on the big issues rather than the minutia.

Question 5

1 - 0 total
2 - 5 - 6
6 - 10 - 1
11 - 15 - 1
16+ - 3

Bureau of Solid and Hazardous Waste Questionnaire

Question 1 - comments

Are these people going to move there? At what cost? Or will they commute a few days each week? Also, at what cost and loss of productivity?

Decentralization will create a nightmare of nonuniformity and confusion for years. I don't see a need for this other than cosmetics. Highly technical reviews and staffing are better done centrally.

Will it speed up? Will Madison have veto power? Will review be uniform? It doesn't appear there is enough review staff now. How could there possibly be with decentralization?

1. Our environmental office is in Madison: access to DNR staff and files. 2. Senior, central review staff have clout to compromise to find a mutual, effective solution. 3. We have a large project with DNR as client: 1 central, one district, 1 area staff = very difficult communications, progress.

Although in general we favor decentralization of DNR plan review, we believe that the solid waste plan review works well as organized and should remain within the central office.

Local staff are more responsive and understanding of issues and people involved. However consistency among field offices is very important.

Due to the specialized nature of solid waste projects and the expertise required, it seems advantageous to keep the technical staff together for better transfer if information and consistency of interpretations.

The Department's decision makers should be closer to the projects to facilitate site visits, be closer and more readily available for meetings and promote better working relationships.

A strong no! You currently have a central office sized to allow for staff interaction and discussion on several concurrent plan reviews. This allows for a more coordinated and uniform approach to review, workload distribution, technology transfer, guidance and training. Small regional offices don't tend to have these opportunities.

Central office tends to be to bureaucratic, while field offices would likely have a greater knowledge of local issues/needs to balance with practical solutions to problems.

It requires more individuals to be knowledgeable in plan review. Consistency with respect to code application could be

Bureau of Solid and Hazardous Waste Questionnaire

Question 4 - comments

Where is the driver for decentralization? Internal WDNR or external? Do those favoring it really - I mean really - understand all that is involved? I suspect not. Decentralization will be a nightmare - creating more problems than it solves. (I'm wondering if the decision has already been made and you might be trying to justify it).

Decentralization sounds like the best idea in theory BUT lack of uniformity will be a problem both in timeliness and code interpretation.

Wisconsin administration codes are fairly clear and generally fairly interpreted. Policy, however, varies from district to district. Keep the review authority and staff in Madison.

The solid waste section should feel good about the quality of their work, and a centralized program has worked well. If I have to make one comment for improvement it would be to improve the time efficiency of reviews. 300-400 staff hours for a feasibility review is as much or more time than it takes consultants to actually gather the data and prepare the report. The section should challenge itself to be more efficient, if the review times are in fact this long. Good luck.

The access we have to Madison is not a problem. However, from Northern Wisconsin it is.

We have been satisfied with the Bureau of Solid Waste staff being located in Madison. They are easy to reach by telephone and willing to visit the project sites when the need arises.

Our biggest problem has been timeliness of reviews. It just doesn't get done according to the times set in the regulations. The Department would be more effective if you were more accessible and met the schedule.

Dave Carper, Paul Huebuer, Dennis Mack, and Gene Mitcael have been very helpful and responsive to my questions and needs. Their approach should be spread across the Department.

For our larger clients there is not an issue - what is most important is consistency and getting DNR staff to visit projects.

It should be performed at a central location for consistency and to utilize WDNR expertise.

affected. A centralized rather than a district approach makes more sense for complex issues.

We believe the central office has developed a level of expertise which would not easily be transferred to the districts.

The review process needs to be consistent and based on our company's experience there are inconsistencies currently at the districts. We believe this could get much worse if the larger design and operational issues are spread out.