

# Organizational Report to Louisville Metro Air Pollution Control District

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## 1.0 Project Overview and Background

Louisville Metro Air Pollution Control District (APCD) has been working to ensure cleaner air for the residents of Jefferson County, Kentucky for over 65 years. Originally organized in 1945 as the Louisville Smoke Commission, APCD implements the federal Clean Air Act in Louisville by delegation from the U. S. Environmental Protection Agency (EPA) and in partnership with the Kentucky Division for Air Quality (KDAQ) through a grant of concurrent jurisdiction.<sup>1</sup> APCD is a division of Louisville-Metro Government under the Division of the Economic Growth and Innovation Department.

The APCD regulates emissions of air pollutants from stationary sources, including nitrogen oxides, carbon monoxide, particulate matter, volatile organic compounds (VOCs), sulfur dioxide, asbestos and other air toxics, to ensure that Louisville Metro makes steady progress toward achieving and maintaining federal and local air quality standards. This includes permitting sources of air emissions, including large “stationary” sources, such as automobile and large appliance assembly plants, electric generating utilities, and chemical and manufacturing plants, and smaller “area” sources, such as dry cleaners and auto body shops.

### 1.1 Project Overview

In 2013, APCD received unsatisfactory audit findings with regard to the APCD ambient air monitoring operations from Technical Systems Audits (TSAs), KDAQ and by EPA Region 4. In addition, APCD’s Executive Director retired. As a result, APCD, at the request of the mayor’s office, is in the process of reviewing its processes and structure. Smith Management Group (SMG) was asked to review and evaluate APCD’s current organizational structure.

### 1.2 Description of Project Team

SMG has a long history of providing organizational management services to its clients, including industry, institutions and governmental entities. SMG’s organizational assessment experience usually relates to the effective implementation of programs that pertain to environmental law or regulation, or to management practices and protocols.

Scott R. Smith, senior consultant with SMG, served as Project Manager for this project. Mr. Smith worked as Chief of Staff of the Kentucky Environmental and Public Protection Cabinet (the Cabinet). While in that position, he worked closely with all of the Commissioners and Division Directors to address organizational and personnel issues as they related to internal and external stakeholders. While serving as Chief of Staff, Mr. Smith wrote one of the first Strategic Plans for the Cabinet (the Plan). The Plan was used to establish annual program goals and measurable outcomes. He worked closely with each department to ensure that departments were organized appropriately, that programs and policies were

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<sup>1</sup> KRS 224.20-130.

being carried out, and that they were meeting the goals and outcomes that had been established in the Plan.

Mr. Smith is supported by a team of technical and legal specialists with experience with organizational structure and management.

### *1.3 Project Fundamentals*

At the onset of the project, SMG established the following project fundamentals to help guide the suggested evaluation process:

- Meet with the mayor's office and the current management team of APCD and understand why the organizational structure needs to be reviewed.
- Identify important stakeholders (internal and external) that would be impacted by an organization change.
- Interview identified stakeholders to determine what they think the strengths and weaknesses are of the current organizational structure and what improvements they believe could improve the organization.
- Assess key work activities of APCD and suggest the appropriate organization of activities, including clarifying how responsibility and authority are clearly delineated.
- Work towards the goal of creating an organizational structure that will improve how employees execute their responsibilities and authority, coordinate and work with others and achieve organizational goals and objectives.

## 2.0 Current Organizational Structure

APCD currently employs a staff of nearly 70 engineers, air quality and environmental professionals, inspectors, and technicians. In addition, the agency is supported by computer, communications, records management, accounting and administrative services, as well as legal staff from the County's Attorney's office. The current organizational chart can be seen in **Figure 1**.

The complexity of the current organizational chart reflects the changing functions of APCD over time and is a result of piecemeal alterations. It is clear that it is time to step back and take a holistic look at the organization with new eyes.

Descriptions of current responsibilities and tasks for each section of the APCD's staff are provided on **Table 1**.

# Louisville Metro Air Pollution Control District

November 8, 2013

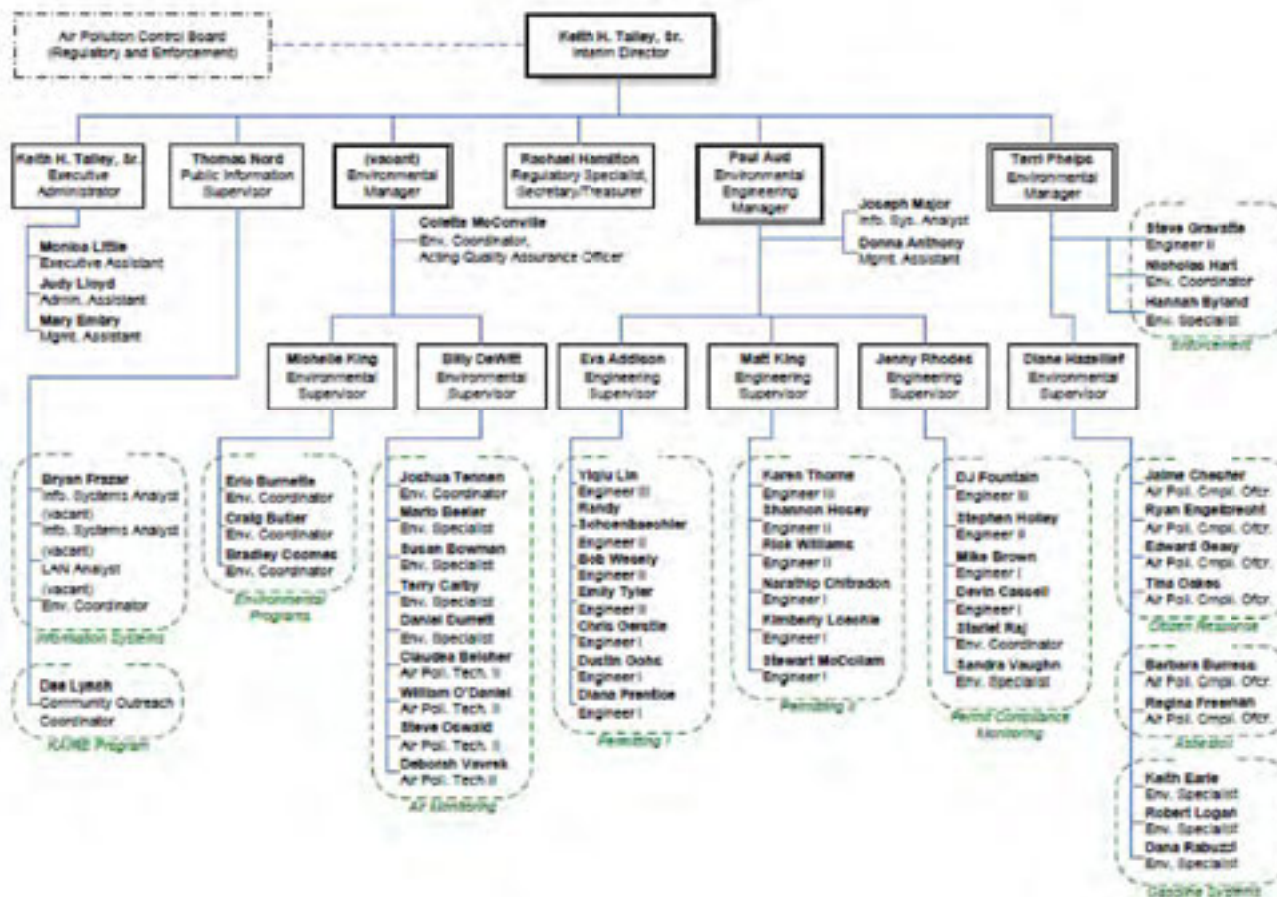


Figure 1

**Table 1**

<b>Section</b>	<b>Description</b>	<b>Percent of Personnel</b>
Engineering	Provides services to Louisville’s business and industrial communities. Issues permits, reviews emissions inventories, monitors permit compliance, and conducts on-site inspections of point sources of air emissions. Implements the STAR Program.	37%
Air Monitoring	Collects and analyzes air quality data, monitors ambient air pollution, measures meteorological data, quality assures data, and helps forecast air quality for Louisville.	16%
Community Compliance	Investigates citizen complaints about air pollution, including odors and outdoor burning. Issues permits for Gasoline dispensing (Stage I/Stage II), removal of asbestos-containing material, and open burning.	15%
Enforcement	Enforces the APCD’s regulations. Coordinates with the Engineering and Community Compliance sections to ensure industry, commercial business and the public comply with all applicable regulations. Issues notices of violation and works with the Jefferson County Attorney’s Office to settle violations through board orders and agreements, resolve violations through administrative hearings, and prosecute violations of APCD regulations, when necessary.	6%
Environmental Programs	Provides air quality planning services, assists with policy development, and coordinates agency programs. Works with a wide variety of stakeholders, including APCD staff, other government agencies, businesses, and the general public to provide transportation and dispersion modeling, real estate development review, policy research and analysis, stakeholder group coordination, and public outreach.	7%
Public Information	Responsible for organizing information internally and communicating information about APCD to the public. Coordinates Kentuckiana Air Education (KAIRE), the APCD’s public outreach and education program.	9%
Administration	Includes the office of the Executive Director and Executive Administrator, ensures effective and efficient management of all aspects of the agency in support of its mission. Provides internal services such as, information technology support, budgeting and payroll, and grants oversight as well as external services including, open records, rulemaking, and developing the Jefferson County portion of the SIP.	7%

APCD's regulatory authority is through the Air Pollution Control Board (the Board). The Board is created in accordance with KRS Chapter 77. Members of the Board are appointed to their positions by the Mayor. The Board is required by statute to be served by "a competent secretary-treasurer and an air pollution control officer."<sup>2</sup> Two positions within APCD are required to serve the Board. The air pollution control officer is required to "be an engineer by profession and shall be a graduate of a recognized university or college, shall be thoroughly familiar with the theory and practice of the prevention and control of air pollution, and shall meet the qualifications for a nonelective peace officer."<sup>3</sup> There are no specific statutory requirements for the Board's secretary-treasurer.

Under the APCD's regulations, the secretary-treasurer is responsible for collecting petitions for administrative hearings and serving written notice of petitions for administrative hearings.<sup>4</sup> The secretary-treasurer is also responsible for collecting and providing transcripts of administrative hearings and collecting fees for the creating of transcripts.<sup>5</sup> Other duties of the secretary-treasurer can be found in APCD Regulation 1.9.

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<sup>2</sup> KRS 77.085(1).

<sup>3</sup> KRS 77.085(2).

<sup>4</sup> APCD Regulation 1.19.

<sup>5</sup> APCD Regulation 1.19.

### 3.0 Current Issues and Concerns

SMG interviewed employees of APCD as well as external stakeholders. The organizational structure concerns identified by the stakeholders can be grouped into the following general areas:

- Lack of former upper management oversight and control.
- The number and location of employee positions need to be assessed.
- Permitting, inspection and recordkeeping processes should be put in place to prioritize higher risk emission operations while reducing the agency's interface on low and very low risk operations.
- The current air monitoring program has had a separate assessment focusing on the number of staff, staff qualifications and organizational structure. These recommendations should be implemented.
- A conscious continuous improvement of the agency's culture needs to be a priority.

#### **3.1 Issue/Concern:** Lack of former upper management oversight and control.

This issue was identified through comments about appropriate levels of supervision, communication, consistency, coordination and the placement of programs within the overall structure. While organizational structure cannot totally eliminate this issue, there are many facets that can be improved. The recommended organizational structure has added a Deputy Director and made that person directly responsible for the day to day operations of the operational staff, effectively a Chief Operations Officer or COO. The recommended organizational structure also includes a position that is responsible for strategic planning and administration of the organization. This position will oversee periodically review APCD programs and recommend necessary improvements to meet the agency's strategic plan. The position will also oversee training within the agency. This should help facilitate communications between sections and help coordinate upper management's involvement in decision making on important issues within the organization.

#### **3.2 Issue/Concern:** The number and location of employee positions need to be evaluated and the qualifications of current staff need to be assessed relative to each position.

This issue was identified through comments with regard to specific functions of staff in each section as well as overall organizational functionality. The overall number of employees appears to be high for a local air quality agency organization with APCD's amount of responsibility. An overall staffing assessment needs to be conducted to ensure that there are the right number of employees and employees with the right qualifications are in the correct positions. Benchmarking APCD against similar organizations will help develop justifiable staffing numbers, enable adequate job coverage and allow succession planning and staff development.



Staff needs to be both physically and organizationally placed within sections where they are involved and managed. The proposed organization chart attempts to place staff within functional teams within the organization. This should result in improved efficiency and accountability.

**3.3 Issue/Concern:** Permitting, inspection and recordkeeping processes should be put in place to prioritize higher risk emission operations while reducing the APCD's interface on low and very low risk operations.

This issue was identified through suggestions about the need to prioritize, and the need to ensure that the effort matches the need and urgency of a task. All stakeholders interviewed applauded the current agency efforts to improve the efficiency of the permitting process. Improved efficiency will allow the agency to focus on larger, higher risk facilities. This initiative will also help improve and reduce the complexity of certain permit applications. In order to ensure that small businesses continue to be served, a Small Business Compliance Assistance group has been recommended and added to the proposed organizational chart. This unit will focus on making small businesses more aware of local air issues and assist them in reducing emissions. This will be accomplished by providing information, training, compliance strategies and compliance technologies.

**3.4 Issue/Concern:** The current air monitoring program has received a complete assessment from a separate consultant focusing on the number of staff, staff qualifications and organizational structure. These suggestions should be implemented.

This issue was highlighted by the audit findings and by comments about the appropriate placement of various functions in the organization. There are many facets of this particular part of the organization that need to be addressed. There has been a breakdown in quality control and quality assurance processes as well as a lack of training. The job descriptions and staff qualifications have been reassessed by Inquest. Based on Inquest's reassessment, SMG has proposed Quality Assurance and Quality Control positions as well as data processing and modeling components for the section. In the recommended organization structure, the Air Monitoring manager position reports to the Deputy Director or COO. This position was elevated to improve communication and accountability within APCD.

**3.5 Issue/Concern:** A conscious continuous improvement of APCD's culture needs to be a priority.

This issue was highlighted as critical through comments on the need for teamwork, consistency, meaningful, purposeful work and territorial issues. While this issue may not be able to be addressed directly through organizational structure changes, culture change can begin with an organization with clearly defined structure and lines of responsibility and authority.

One of the priorities of the proposed organizational structure was to create an environment that would improve communications, facilitate an open exchange of ideas, foster creativity, create a congenial, close knit teaming environment and an organization that fosters meaningful and purposeful work.

**3.6 Issue/Concern:** The Environmental Programs section should be integrated into other sections or programs.

The Environmental Programs section of APCD does excellent work that is beneficial to the agency and the community as a whole. However, it appears that APCD may benefit more by integrating the positions within Environmental Programs into the following sections in the recommended organizational structure: (1) public information; (2) regulatory development and planning; (3) strategic planning and administration for those with recordkeeping responsibilities; and (4) permitting for those with modeling responsibilities. APCD should address some aspects of sustainability when it is consistent with APCD's mission; however, other Metro departments such as the Office of Sustainability, with a mission of embedding "sustainability into the culture of Louisville's citizens while implementing a wide variety of projects and initiatives to influence behavior change", may be better suited to conduct some of the work being performed.

## 4.0 Organizational Management Strategies

There is no perfect organizational structure. The correct structure for an organization is one that allows it to successfully implement strategy. The ultimate goal in developing an organizational structure for APCD has been to provide a framework that will allow APCD to translate its mission and strategies into activities that use its resources efficiently and effectively.

Organizational structure affects how employees -- even at the top of the organizational chart -- execute their responsibilities and authority, coordinate and work with others and achieve organization goals and objectives. The organizational structure suggested in the Recommendations section of this report attempts to align and support APCD's mission, goals and operating objectives. In order to arrive at the recommendations, SMG studied other governmental organizational structures. Examples of these structures are attached in **Appendix 1**.

Most government organizations are classic examples of vertical structure. Vertical organizational structures are characterized by few people at the top and increasing numbers of people in middle and lower positions within the organization. Governmental bodies lean toward vertical structures because they create well defined job scopes and powers. Each person has a clear role to play. Other organizational structures were assessed such as horizontal structure and divisional structure. None of these structures, if holistically applied, could be practically or efficiently implemented to support the mission of the APCD. However, some aspects of a horizontal structure have been included in SMG's recommendations to encourage interaction between work groups and promote a more efficient use of employees' time.

### 4.1 Organizational Design Principles

While an organizational chart may appear to be the centerpiece of an organization, there are several other key elements that impact how successful an organization will become. These elements are depicted in the organizational circle below in **Figure 2**. SMG's Recommendations follow the main headings of the key elements found in **Figure 2**.



**Figure 2**

Source: Bain & Company organizational Toolkit and The Bridgespan Group

As illustrated in Figure 2, organizational design considers five interrelated components:

- **Leadership** consists of providing the organization a clear vision and priorities as well as a cohesive leadership team.
- **Decision making and structure** include the development of clear roles and accountabilities for decisions and an organizational structure that supports the organizations objectives.
- **People** means that the organization has the individual talent necessary for success and that upper management provides them performance measures, direction and incentives aligned to the organization’s objectives.
- **Work Processes and Systems** enable the superior execution of programmatic work process to become part of the culture of the organization. Effective and efficient support process and systems are important to the success of the organization.
- The **Culture** of an organization is important. The organization must encourage high performance values and behaviors. It must also encourage its employees to constantly seek out better/more efficient ways to complete their work and be facilitators of change within the organization.

## 4.2 Organizational Strategies

Sound principles of organizational design are the foundation of SMG's recommendations for APCD. SMG began by identifying levels of responsibility, authority and accountability for work performed within the current structure. These insights were developed during the interview process that is described in Section 3.0. Following are several overarching ideas and assumptions used in the development of the recommended organizational structure:

- Levels of responsibility, authority and accountability for work performed should be identified within the structure.
- Activities should be grouped into similar and closely related activities. While this organizational structure has taken the form of a traditional regulatory agency (vertical structure), this structure should not prevent the use of human resources horizontally across the organization. Operating policies, procedures and culture should support flexibility in applying talent where it is needed without significantly compromising operational effectiveness and efficiency.
- Responsibility assigned to a position will have a corresponding level of authority.
- The number of staff reporting to any one position (span of control) has been assessed and in some cases limited to insure adequate managerial control and supervision.
- Position descriptions and goals and objectives for each work area were not developed by SMG. These are important aspects which enhance the effectiveness of an organization. APCD's management team should rewrite or revise job descriptions for positions in order to ensure that each position functions effectively within APCD.
- Top management will set the tone and lead APCD. It needs to make sure that there will be cooperation and open communication between sections, vertically and horizontally and that there will be an overall sense among all employees that they belong to and are responsible for this organization regardless of their location within the APCD.

Where appropriate, SMG has identified particular issues through our interviews and research and has suggested solutions that may remedy the particular issue uncovered. The key recommendations are highlighted in bold to make it easier for the APCD to understand and implement.

## 5.0 Recommendations: APCD Organizational Strategies

### 5.1 Leadership

All levels of APCD leadership should be redefined into that of team leader, coach and facilitator. **The Executive Director should set the tone and lead the APCD.** This individual must make sure that there is cooperation and open communication between sections, both vertically and horizontally. In addition, the Executive Director will be responsible for creating an overall sense among all employees that they “belong” as an employee of the APCD, regardless of their location in the organizational structure.

**The organization should be divided into two general groups: (1) Air Quality Operations and (2) Strategic Planning and Administration.** These groups will be led by experienced managers with considerable experience in the air regulatory arena and with APCD. It is imperative that the Executive Director have a Deputy Director or COO in charge of operations to facilitate internal communication and coordination between the various divisions of the APCD. The Deputy Director should be responsible for the operations portion of the organization such as permitting, compliance, enforcement and air monitoring. This structure would allow more direct interaction and management of the operational sections of the APCD. The Strategic Planning and Administration side of the chart will allow for there to be oversight of the operations functions of APCD and will allow a separate focus for administrative matters. This will leave the Executive Director free to focus on critical and important issues that impact the organization, coordinate with external stakeholders, and address board-related activities.

Every leader in APCD should be a resource for their section. Each manager should be in the forefront of changes within the APCD and should strive to coordinate across work unit boundaries. **The number of staff reporting to any one managerial position (span of control) has been assessed and in some cases limited to insure adequate managerial control and supervision.**

Following the lead of the Executive Director, all roles need to be clearly understood and a clear vision for the organization needs to be shared by everyone. Sections should work towards specific objectives that will be set by leadership. This can be done through developing highly effective team practices and strategies and opening up cross-team communications. Each section and their leader need to feel empowered and accountable, so that all feel they have a voice and can contribute. The proposed organization chart has been designed to foster cooperation and open communication between work units vertically and horizontally, and ensure an overall sense among all employees that they belong to this organization regardless of their location within the organization.

### 5.2 Decision Making and Structure

The new structure of the APCD should be clear and flexible, with a goal of satisfying statutory and regulatory obligations and fulfilling its mission. **Clear roles will be defined within the organization and the roles will be supportive of APCD’s mission statement.** In order for each section to operate efficiently and effectively, APCD management will work to develop or rewrite job descriptions for

positions within the organization that require specific qualifications, background, education and experience necessary to perform the assigned tasks.

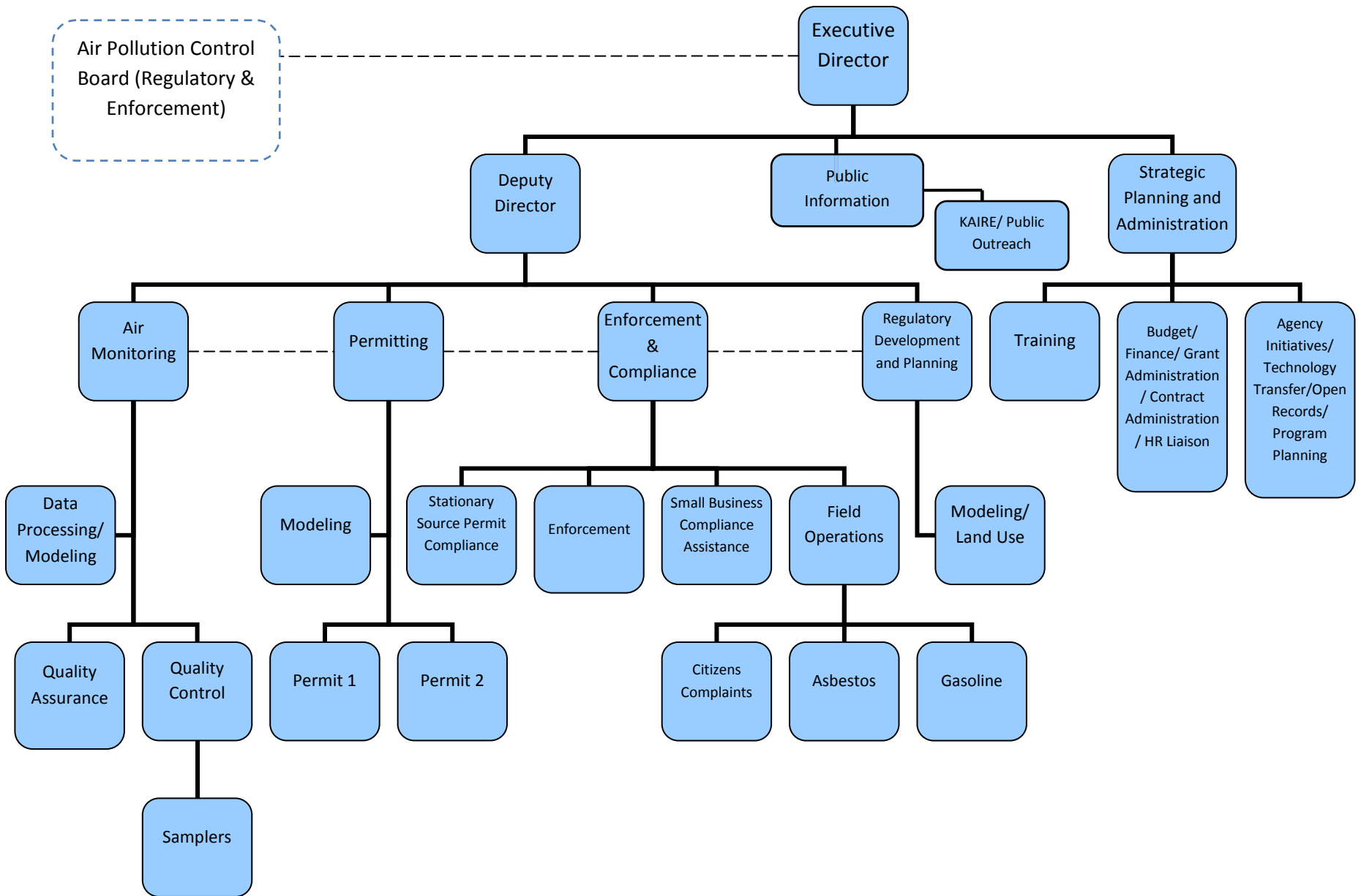
Finally the new structure is designed to encourage coordination, collaboration and information sharing between the sections and the public. The organizational sections have been arranged in a logical manner keeping in mind the functionality of each section, their relationships between other components of the organization and the public, and statutory and legal obligations of APCD.

The proposed restructuring has clearly established lines of authority and responsibility. Other initiatives within SMG's recommended organizational structure include:

- Combining Air Compliance and Enforcement;
- Reorganizing the Air Monitoring section; and
- Establishing a Small Business Compliance Assistance group.

SMG recommends the organizational structure shown on the next page, in **Figure 3**. SMG recognizes that APCD may need to alter the proposed structure due to issues and concerns that were not studied by SMG.

Figure 3 – Recommended Organizational Chart





### *5.3 Proposed APCD Sections*

Under the proposed reorganization, APCD would be comprised of four sections under the Deputy Director and a division or section that focuses upon strategic planning and administration. Each section has specific air quality responsibilities. Most sections will be divided into work units that handle certain aspects of section responsibilities.

#### *Strategic Planning and Administration Section*

This section provides operational and administrative support services to APCD. The section will be responsible for a wide range of administrative needs including: financial planning, budget development, grants management, training coordination and day to day office administration. **This section will also periodically review APCD programs and recommend necessary improvements to meet the Agency's strategic plan.**

#### *Compliance and Enforcement Section*

The Compliance and Enforcement section will be responsible for determining compliance of sources of air emissions in Jefferson County through inspection, compliance monitoring, testing and records review. The section will also enforce penalties upon sources that are found to be out of compliance. The primary functions of the section include determining compliance at major sources of air pollution, conducting inspections, responding to complaints, reviewing and approving stack tests, reviewing continuous emissions and opacity monitoring, taking appropriate enforcement actions for noncompliance and providing compliance assistance to assure small regulated sources understand compliance requirements. The Compliance and Enforcement section should also include a Small Business Compliance Assistance group that will provide training and outreach to small businesses regarding air quality and air permitting issues. The Small Business Compliance Assistance group should frequently interact with the Small Business Outreach section of the Economic Growth and Innovation Department.

#### *Air Monitoring Section*

The Air Monitoring section will oversee all aspects of air quality monitoring in Jefferson County including the maintenance of Jefferson County's air monitoring network that measures regulated air pollutants covered by the Clean Air Act, the collection of air monitoring samples and the handling and sharing of data collected from the air monitoring network.

#### *Air Permits Section*

The Air Permits section serves the residents and businesses located in Jefferson County by issuing construction and operation permits to sources that emit regulated air pollutants pursuant to the federal Clean Air Act, federal law and state and local laws and regulations. Permits will be issued after

reviewing and evaluating permit applications for administrative and technical completeness and ensuring that each application meets regulatory adequacy. Permits will be written to meet local and federal regulations and include information on which pollutants are being released, how much may be released, and what kinds of steps the source's owner or operator is taking to reduce pollution. All permits will include a mechanism to demonstrate compliance with the permit conditions.

### *Regulatory Development and Planning Section*

This section will identify regulatory trends and schedules for publication of regulations and revisions to existing regulations. The section will track regulatory trends and policy changes and will anticipate new regulatory developments. This section will work with stakeholders in the development of regulations and air pollution reduction strategies. Regulations developed will conform to EPA, state statutes, and local regulations. They will develop air quality plans, also called state implementation plans, which are designed to attain and maintain the National Ambient Air Quality Standards, and to prevent significant deterioration of air quality in areas cleaner than the standards.

### *5.4 People*

The proposed organizational structure should focus on people. Each employee should be empowered with the authority, skills and information required to do their jobs effectively. Performance measures should be created and incentives should be aligned with APCD's mission. Most importantly, good interpersonal relationships should be fostered in order to maintain communication throughout the APCD.

**All sections within the APCD, despite reorganization, need to be offered consistent training.** In addition, **positions need to be regularly reassessed to insure that staff has the competence and/or technical ability to perform tasks** necessary to generate quality data, issue effective permits, and ensure compliance.

### *5.5 Work Processes and Systems*

**Management and staff of all sections must communicate openly and effectively.** The new structure should facilitate efficiencies in work processes and make the APCD's work more results driven. In order to facilitate efficiency, **the new organizational structure separates compliance and permitting, combines compliance and enforcement, creates a new section solely for air monitoring, and allows the Executive Director to focus upon critical issues that impact the APCD, coordinate with external stakeholders, and address Board related activities, while the Strategy Planning Officer is allowed to focus on administrative and budgetary concerns and the Deputy Director oversees the operational functions of the APCD.** The new structure allows permitting to focus solely upon developing permits and issuing them to the permitted sources. Combining the compliance and enforcement sections will enable APCD to better identify problems and quickly rectify the violation. Finally, as previously recommended by another consultant, air monitoring is elevated to its own section.

Another manner in which APCD can improve work processes as it implements a new organizational structure is to **find similar agencies and benchmark itself against these similar agencies**. This will allow APCD management to determine how well their new organizational structure and agency performance compares to like organizations. In SMG's reorganizational structure and reorganization, APCD should identify staffing numbers and needs and the other output of work done by the staff of similar agencies. Examples of similar agencies that APCD may choose to study are Knox County, TN Air Quality Management Division; Nashville, TN Air Pollution Control; Chattanooga-Hamilton County Air Pollution Control Bureau; Shelby County (Memphis), TN Air Pollution Control Board; and the Indianapolis Air Board.

After reviewing those agencies selected, APCD management should identify certain activities to benchmark against the selected agencies. Several suggestions of outputs to benchmark include: number of permits issued and number of enforcement actions.

### *5.6 The Culture*

Developing a strong culture throughout APCD is paramount to effectively implementing the recommendations contained in this report. Without an effective and functioning culture all other areas of the organizational structure fail. Developing a strong and effective culture must begin with the Executive Director, Deputy Director and Strategic Planning/Administrative Officer, but there must be buy-in throughout all levels of the organization. A key recommendation is to **provide better communication throughout all levels of APCD and throughout the managerial levels of APCD**. The dashed lines between managers on the organization chart in **Figure 3** indicate that these team members must continually communicate with one another as part of their essential job functions.

In addition, **each employee must feel that he or she does meaningful work and contributes to the mission of APCD**. Each employee must take ownership of their work. Good technology systems and administrative assistance is essential to employees maintaining a high level of satisfaction with their work.

## 6.0 Leveraging Outside Resources

Managers of regulatory agencies often get a sense that they are isolated and it is difficult for them to get advice or obtain information on better, more efficient ways to address their issues. While working through issues internally is important, sometimes it can help to obtain advice and council from other managers who have or are addressing similar issues. While each air quality district is different, they share the responsibility developing strategies to meet EPA's air quality requirements. An open exchange of ideas with peer organizations and managers would help to infuse new ideas and approaches into the agency while increasing the confidence of managers that programs they have implemented are admired by their peers.

Jefferson County is Kentucky's only local air quality agency, but there are hundreds of other air agencies across the United States. APCD should identify networking and benchmarking opportunities to improve their organizational management and work processes.

### 6.1 Networking

Organizational networking is an activity by which groups of like-minded people exchange ideas, create concepts, or develop ideas or that are important to their organizations. Organizational networking is a low-cost activity that involves more personal commitment than organizational funding.

In some cases, network members may agree to meet on a regular basis for the purpose of exchanging ideas or discussing ideas that have been successful for fellow members.

Networking opportunities exist with professional organizations, regulatory specific meetings, etc. While these meetings are time consuming and sometimes require registration fees, if attendance is predicated on obtaining information that will improve the individuals technical skills and gaining insights from others that will be beneficial to the organization, the time and financial commitment is worth it. APCD participates as a member of NACAA (National Association of Clean Air Agencies), Metro 4 SESARM (Southeastern States Air Resource Managers, Inc.) and should continue to collaborate with other regulatory stakeholders, including EPA and DAQ.

### 6.2 Benchmarking

Benchmarking can be an important tool for APCD to use in the future. Benchmarking is the process of comparing one's organizational processes and performance metrics to best practices from similar organizations. In the process of best practice benchmarking, management identifies organizations where similar processes exist, and compares the results and processes of those studied (the "targets") to one's own results and processes. In this way, they learn how well the targets perform and, more importantly, the processes that explain why these organizations are successful.

Benchmarking allows organizations to develop plans on how to make organizational or process improvements or adapt specific best practices, usually with the aim of increasing some aspect of the organization's performance. For that reason, SMG has made the recommendations in Section 5.4.

### *6.3 Other Air Quality Organizations Structures*

For the purpose of this report, other air quality organizations structure and framework were reviewed. These organizations represented a wide variety of sizes and geographical locations. The goal of this research was to try to identify good ideas and organizational initiatives that these organizations had initiated. These programs included, the South Coast Air Quality District, Kentucky Division For Air Quality, Pennsylvania Department of Environmental Protection-Air Quality Central Office, Santa Barbara County, CA, Air Pollution Control District, Yolo-Solano Air Quality management District, Oregon Department of Environmental Quality, Indiana Office of Air Quality and local air districts in Memphis, Nashville and Memphis, Tennessee.

A compilation of some of their organizational structures are attached in **Appendix 1**.

## 7.0 Limitations

SMG's analysis of the organizational structure of APCD and our associated recommendations are limited due to the time and scope allowed for this project. Information as to the issues presented by the existing structure and culture was gathered from interviews conducted with certain members of APCD and those outside users and stakeholders who were available to us. Therefore, our analysis of those issues may not represent the full panoply of issues affecting the efficiency and effectiveness of the organization.

Recommendations may change based on the personnel assigned to management and support positions and based on the implementation process chosen by APCD management.

## **APPENDIX 1**

**Santa Barbara County Air Pollution Control District  
Board of Directors**

**Air Pollution Control Officer  
Dave Van Mullen**

**Executive Secretary  
Sara Hunt**

**Administrative  
Bob Van Beveren**

- Air Monitoring
- Applications/Database
- Data Acquisition System
- Information Technologies
- Network & Security
- Facilities
- Fiscal
- Budget
- Payroll
- Human Resources
- Personnel Management
- Benefits

**Compliance  
Craig Strommen**

- Compliance Response
- Enforcement
- Inspections
- Violation Settlement
- Agricultural Burning
- County SSRRC Assistance
- Asbestos Demolition & Renovation
- Compliance Safety & Training
- Hearing Board

**Engineering  
Michael Goldman**

- Permitting
- Engineering Analysis and Support
- GIS Applications
- Federal Title V Permits
- Agricultural Engine Registration
- Emissions Testing
- Source Registration and ERCS
- Air Toxics
- CEMS Program
- Air Quality Modeling
- OCS Permitting
- Public Records Act Requests

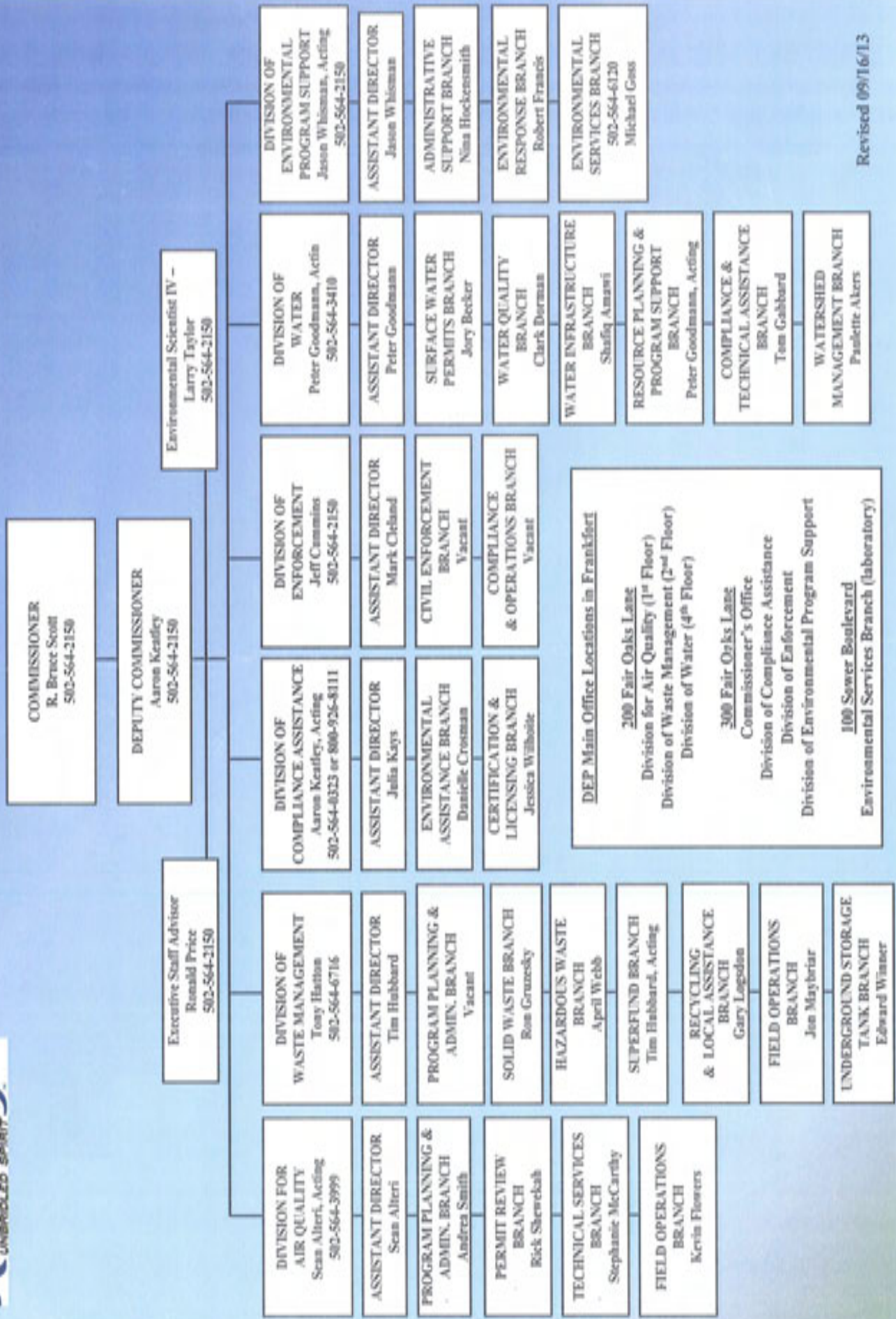
**Technology & Environmental  
Assessment  
Brian Shafritz**

- Business Assistance
- Clean Air Planning
- Innovative Technologies
- Rule Development
- CEQA
- Community Assistance
- Land Use Review
- Public Outreach
- Transportation
- Community Advisory Council





# ENERGY AND ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION



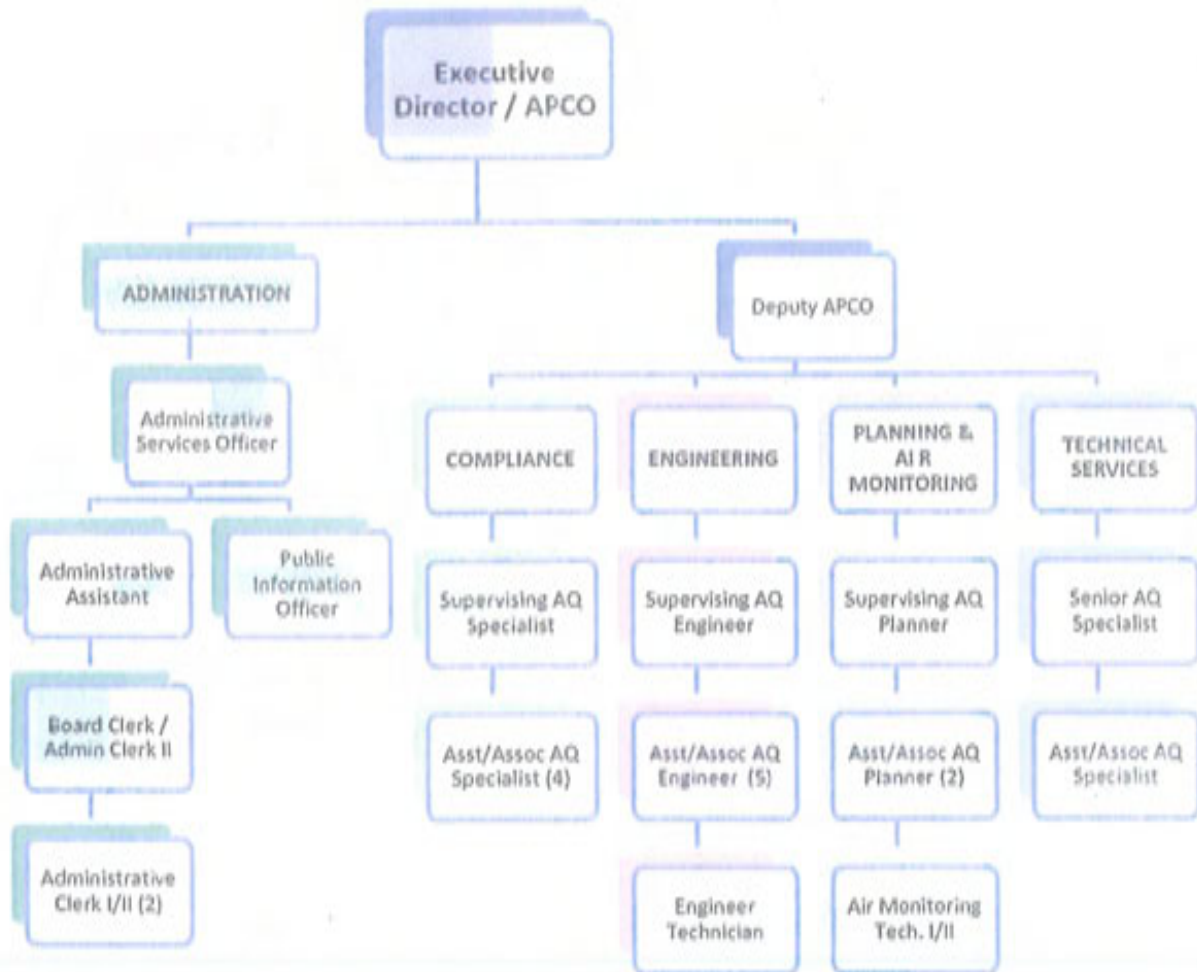
DEP Main Office Locations in Frankfort

200 Fair Oaks Lane  
Division for Air Quality (1<sup>st</sup> Floor)  
Division of Waste Management (2<sup>nd</sup> Floor)  
Division of Water (4<sup>th</sup> Floor)

300 Fair Oaks Lane  
Commissioner's Office  
Division of Compliance Assistance  
Division of Enforcement  
Division of Environmental Program Support

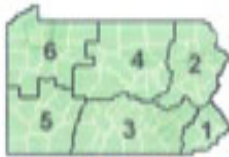
100 Sewer Boulevard  
Environmental Services Branch (laboratory)

## YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT ORGANIZATION CHART



26 Full-time Employees

**AIR REGIONS**



[Region 1](#) | [Region 2](#)  
[Region 3](#) | [Region 4](#)  
[Region 5](#) | [Region 6](#)

**AIR TOPICS**

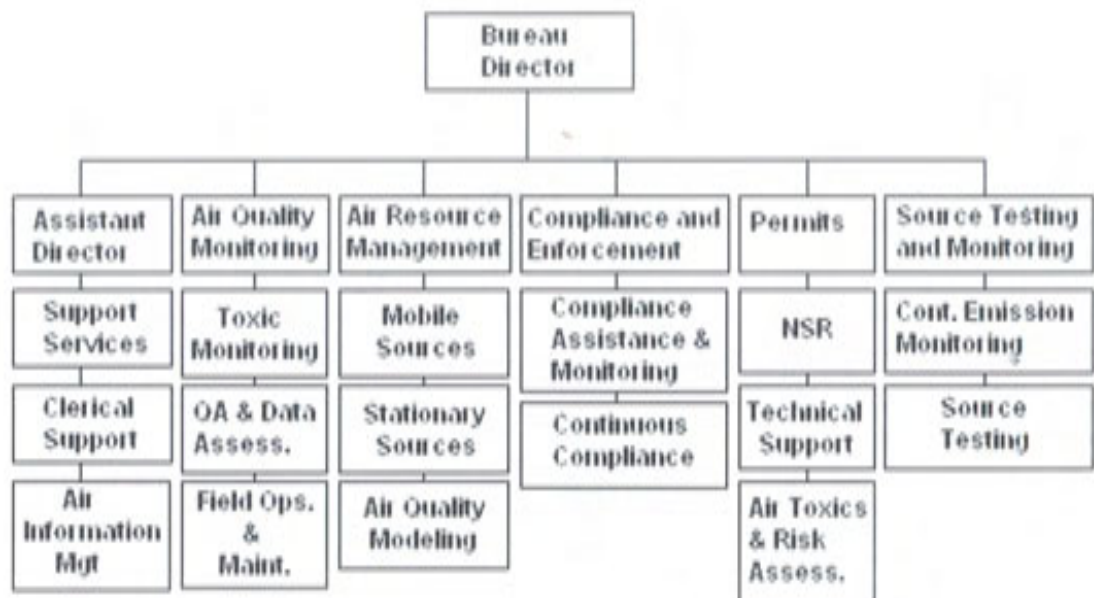
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## Air Quality Central Office Organizational Chart

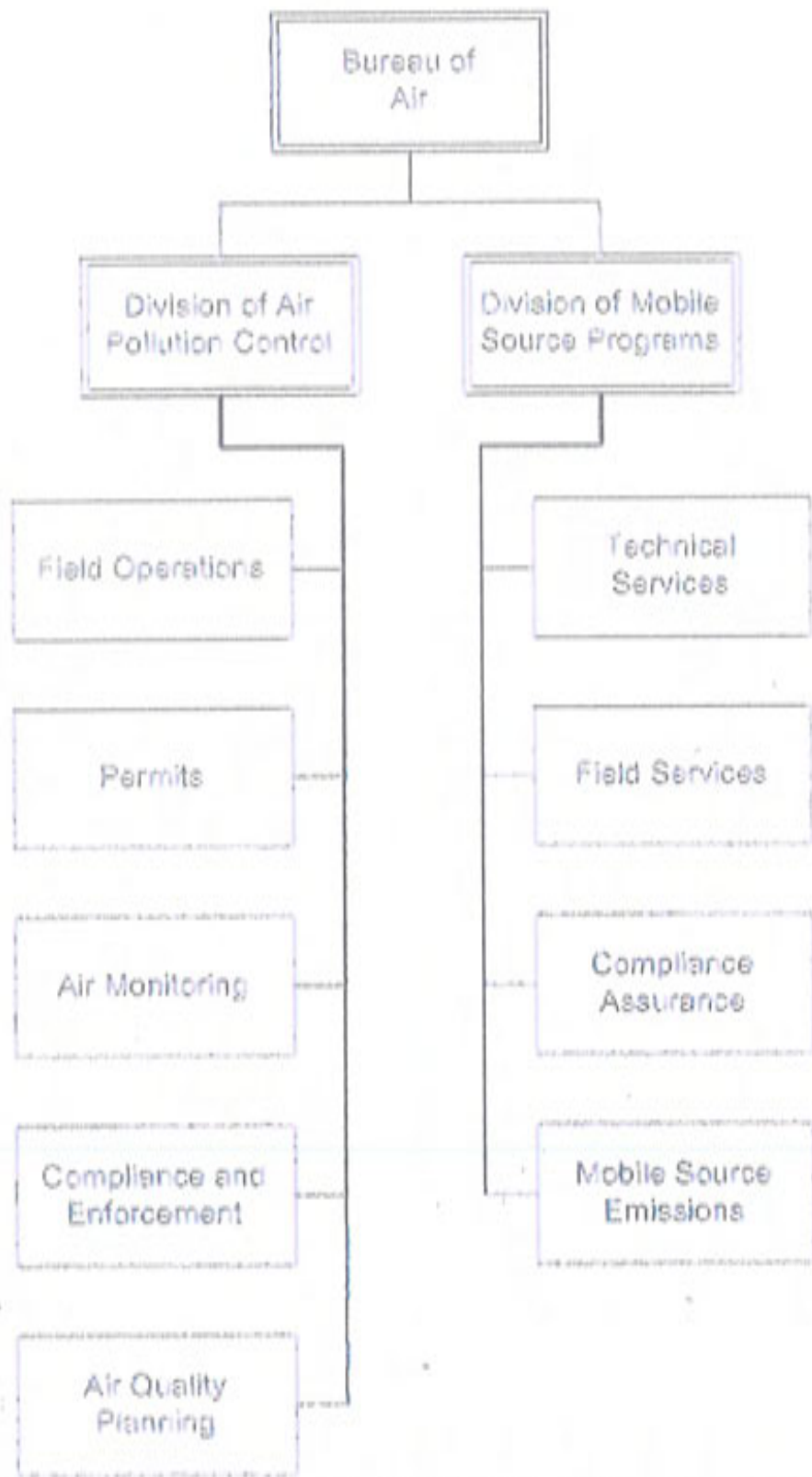


### Bureau Director

- Represents Bureau at legislative, press, regulated community and general public functions.
- Maintains communications within the DEP and outside entities.
- Manages the Bureau's resources to achieve the goals of the Clean Air Act and the Pennsylvania Air Pollution Control Act.
- Establishes Bureau goals, objectives and management policies.
- Phone: (717) 787-9702.
- E-mail: [Joyce E. Epps](mailto:Joyce.E.Epps), Director

### Assistant Director

- Coordinates the Bureau's program development



*IDEM*