



Connecticut Department of Energy and Environmental Protection



Air Permit Amnesty Program for K-12 Schools

July 31, 2013

Keith Hill

Bureau of Air Management

Compliance Analysis & Coordination Unit



Connecticut Department of Energy and Environmental Protection

Amnesty Program Overview

- What is the Air Permit Amnesty Program?
 - short-term program providing a period of amnesty from penalties for air permitting violations
- Who is eligible to participate in the program?
 - all Connecticut public and private K-12 schools are eligible to participate



Purpose

- To provide Connecticut's town and regional school districts and private K-12 schools an opportunity to achieve compliance with state and federal air permitting requirements
- Identify opportunities to incorporate energy efficiency practices



What's Out There?

Private Schools



NO_x PTE = 59 tpy

Large Public High Schools



NO_x PTE = 36 tpy

Co-located Public Schools



NO_x PTE = ????



Enforcement Scenario

- Large sector of sources, with limited environmental personnel, that may have unaddressed air permitting requirements based on PTEs
- These sources typically have high potential emissions, but actual emissions are very low
- Many sources within this sector have not been inspected within the last 15 – 20 years



Traditional Approach

- Traditional enforcement method of inspecting each source would have a high cost while providing minimal environmental benefits
 - Universe is large (> 1000 sources)
 - Resources limited
 - Prolonged effort (3-5 yrs)

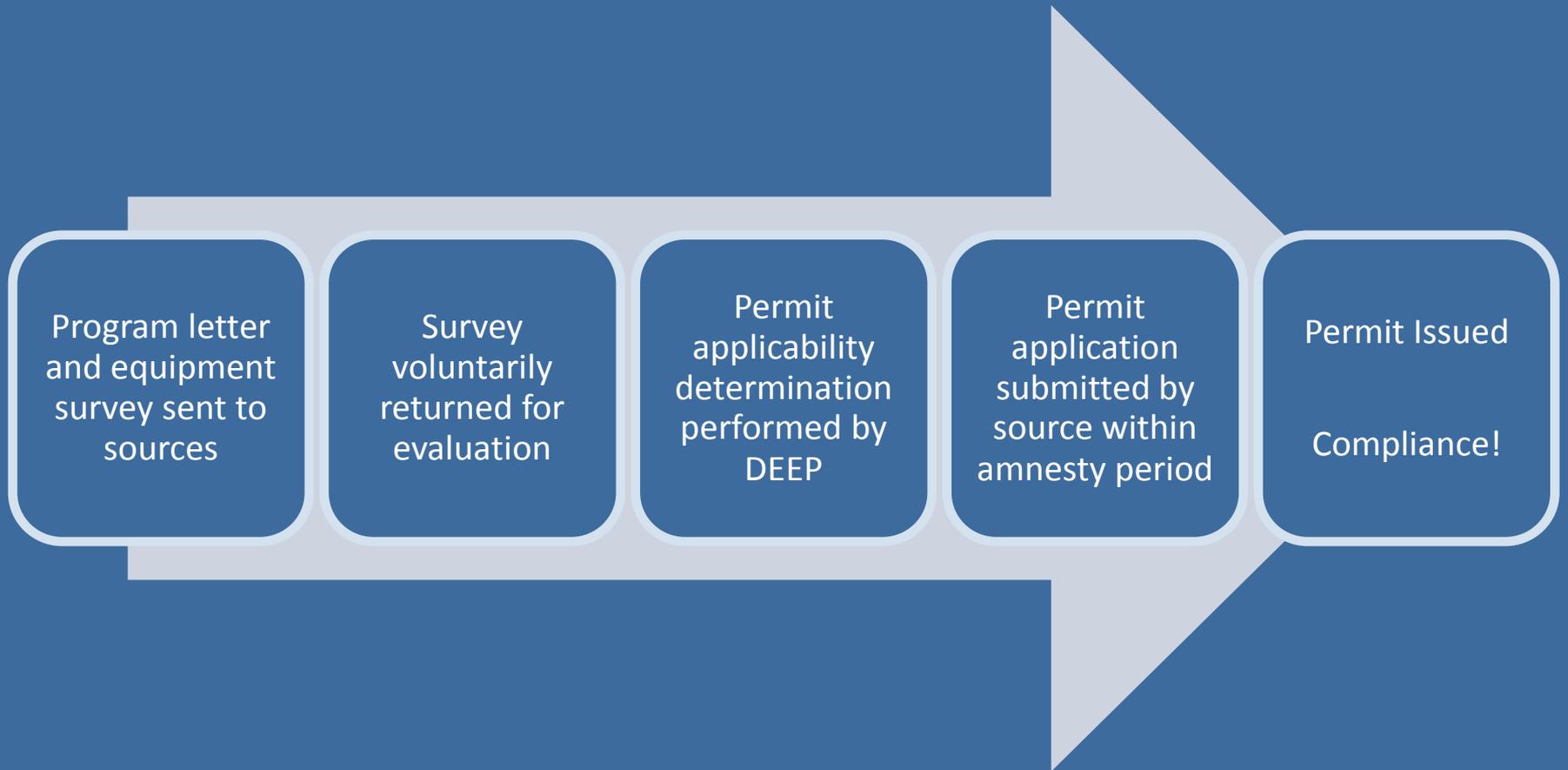


Incentive-based Approach

- Provide opportunity for schools to provide information, traditionally collected by field staff, to DEEP voluntarily
- By participating, DEEP will provide a period of amnesty from enforcement and penalties
- Opportunity to assist schools in pursuing energy efficiency initiatives



Compliance Process



Permit Applicability

- DEEP will use information from the equipment survey to perform permit applicability determinations for each school
- If applicable, DEEP will provide permit application assistance and workshops for those schools that need permits.
- Will also provide education on applicable federal boiler and engine regulations



Compliance Determinations

- Each school will be provided a compliance determination in writing which will include:
 - Permitting requirements, if applicable
 - Monitoring, recordkeeping and reporting requirements for both State and Federal regulations, if applicable
 - DEEP contact information for compliance assistance



Promoting Energy Efficiency

- Survey includes a section on Energy Efficiency
 - What energy efficiency measures have already been pursued
 - Plans for future projects
- Opportunity to participate in the Connecticut Green LEAF Schools Program
- Regional Energy Workshops



Program Benefits

- Compliance with state and federal air permitting requirements
- Energy efficiency opportunities identified and implemented will provide environmental benefit, while saving money for municipalities
- More efficient and effective use of DEEP resources



Contact Information

Keith Hill

Supervising Environmental Analyst

Bureau of Air Management

Compliance Analysis & Coordination Unit

Keith.Hill@ct.gov

860-424-3563



Connecticut Department of Energy and Environmental Protection