

# Air Bureau Permit Program Review Recommendations



Presented by Ric Pirolli Presented at SIPRAC Hartford, CT October 14, 2010

## **Permitting Task Force Report**

Submitted to Governor and General Assembly on September 30, 2010

Report can be found at http://www.ct.gov/dep/lib/dep/permits\_and\_licenses/assessment/permit\_assessment\_report.pdf



# **Website Enhancements Progress**

MASC Calculator	GREEN
Bring necessary tools to the surface for easy access	GREEN
Make technical documents more visible	GREEN
Title V/NSR Catalog	YELLOW
CT BACT Clearinghouse	RED
Permit Wizard	YELLOW
Permit Tracking	RED
Remote Access to EMIT to conduct Radius Searches	RED
Complete NSR Permit Files On-line	<b>VOV</b>

#### **Recommendations to Meet Time Frames**

Process Improvements – changes that do not need authorization, regulatory or statutory action

Programmatic Changes – changes that do need authorization, regulatory or statutory action

Staffing Needs – permanent staff to conduct administrative, technical, and support functions

Additional Resources



#### **Process Improvements**

Develop streamlined Title V application forms and review process so focus is limited to changes

Require modeling submittal with permit application to reduce delays associated with requesting modeling later in the process

Shorten time frames to implement federal actions by requesting EPA provide implementation guidance at the same time new rules are promulgated

Develop a new Title V template that ensures consistency among facilities and forms the basis for accurate compliance certifications

Continue process improvement efforts focused on timeliness and streamlining by identifying causes of processing delays and developing solutions through internal and external stakeholder meetings



## **Proactive Permitting**

Enhance assistance and outreach on new rules and the associated technical issues so small businesses and applicants understand new requirements

Increase the use of permit application meetings for new applicants

Continue SIPRAC permitting subcommittee created during the permit program assessment

Provide compliance assistance tools to ensure applications are accurate and complete and reduce review time



## **Programmatic Changes**

Benchmark CT's regulatory adoption process with other states and seek changes to improve efficiency

Repeal the Indirect Source Permitting Program and replace with MOA btw DEP-DOT

Authorize municipalities to respond to odor and outdoor wood-fired furnace complaints

Repeal Noise Program

Adopt necessary regulatory provisions to fulfill CAA obligations



# Staffing



Support Staff Permit Engineers

Reg Writers Technical Support Services



#### **Additional Resources**

Information technology support

**Ambient Air Quality Data** 

Offsets



# **Next Steps**





### Strategy

#### Identify projects

Assign workgroups/individuals

Survey permittees and consultants

In addition to meeting PA and PPA, challenge staff to:

- Issue Title V renewals prior to expiration
- N.T.D. on Minor NSRs within 120 days of receipt of application
- Notify applicants of minor permit modifications within 21 days and issue within 60 days
- Issue revisions within 30 days



# Suggestions