



Air Bureau Permit Assessment Report - Update



Connecticut Department of Environmental Protection

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SIPRAC

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Agenda

Engineering Priorities for 2011

Update on Report Recommendations

Next Steps and Strategy



2011 Engineering Priorities

Meet prescribed timeframes from Permit Assessment Report

Take action and fulfill recommendations in the report

Identify additional opportunities to increase permit processing efficiency

Increase outreach and stakeholder involvement



Recommendations

Recommendation 1



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

STATUS: A streamlined process for the GPLPE has been developed as well as streamlined and user-friendly GPLPE forms for the applicants. Currently developing a new streamlined Title V renewal process.

Completion date: December 2011



Recommendations, continued

Recommendation 2



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

STATUS: Focus group discussed implementing recommendation. The discussion to overcome possible barriers is underway and will be further evaluated in January's NSR LEAN Kaizen event.

Completion date: June 2011



Recommendations, continued

Recommendation 3



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

STATUS: Connecticut and other states proactively pushing EPA to provide more timely guidance.

Completion date: on-going



Recommendations, continued

Recommendation 4



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

STATUS: Use SIPRAC and staff feedback to develop improved template including compliance certifications. Internal workgroup formed and development proceeding.

Completion date: June 2011



Recommendations, continued

Recommendation 5



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

STATUS: LEAN Team Charter developed to guide LEAN effort on the Major NSR Permitting Process. The goal of the Kaizen is to consistently meet the 60/180 day timelines. Staff has also been empowered to identify and raise inefficiencies to the supervisors when processing permits. All inefficiencies are then reviewed and addressed.

Completion date: on-going



Recommendations, continued

Recommendation 6



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

STATUS: Created a new Air Permitting Web page and continuing to add new content. Enhanced effort to assure stakeholders at SIPRAC are kept informed. Presented the new solvent cleaning rules and had EPA present the new GHG permitting rules and GHG BACT guidance at the December SIPRAC meeting. In discussions with CBIA to create a workshop for industry. Compliance assistance program currently in development.

Completion date: on-going



Recommendations, continued

Recommendation 7



Increase the use of permit application meetings for new applicants

STATUS: Promoting pre-application meetings through new web page. Staff offers application meetings to prospective applicants when handling Engineer of the Day calls.

Completion date: on-going



Recommendations, continued

Recommendation 8



Continue SIPRAC permitting subcommittee created during the permit program assessment

STATUS: The subcommittee has been formed with a wide cross section of industry and consulting firms. Next meeting is planned for February 2011.

Completion date: on-going



Recommendations, continued

Recommendation 9



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

STATUS: A MASC Calculator developed and available on the Air Web page and downloaded 395 since July. A Permit Wizard is in development to assist with permit applicability. Emissions calculators for boilers and diesel engines are in development. Continuously updating application forms and instructions to improve clarity.

Completion date: on-going



Recommendations, continued

Recommendation 10



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

STATUS: The need to complete the GHG and PM2.5 NSR regulations has delayed this effort, however the task is delegated to staff lead and prioritized.

Completion date: December 2011



Recommendations, continued

Recommendation 11



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

STATUS: MOA under review by ConnDOT and once executed, repealer package will be pursued.

Completion date: June 2011



Recommendations, continued

Recommendation 12



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

STATUS: Reviewing authority to pursue necessary enforcement delegation for municipalities.

Completion date: December 2011



Recommendations, continued

Recommendation 13



Repeal Noise Program

STATUS: Regulatory language being drafted and statutory language being researched to effectuate legislative intent under CGS sec. 22a-73(a), that noise control programs be administered at the municipal level.

Completion date: June 2011



Recommendations, continued

Recommendation 14



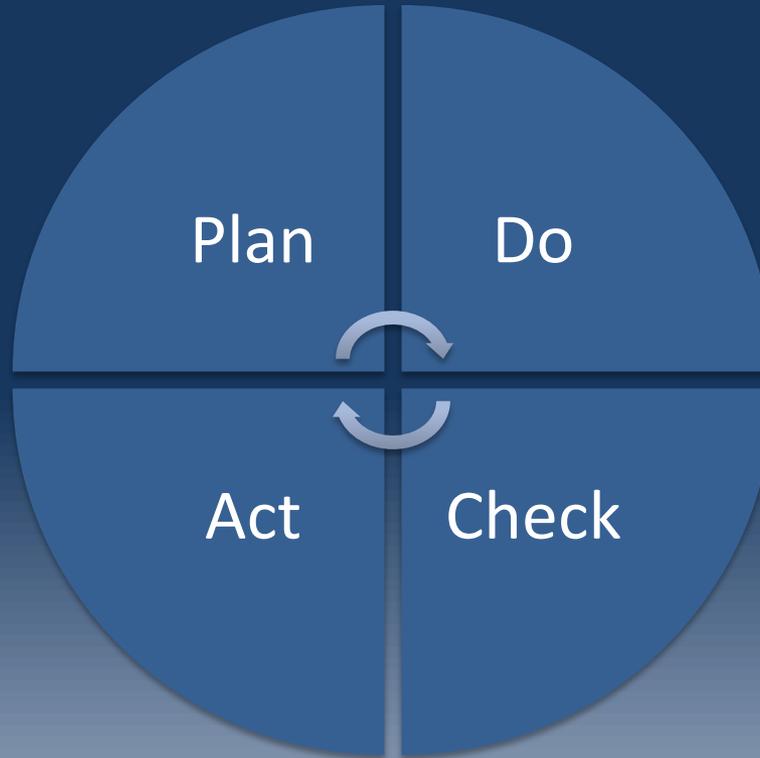
Adopt necessary regulatory provisions to fulfill CAA obligations

STATUS: Prioritized 2011 regulatory agenda and will vet at January SIPRAC meeting for comment. Adopting GHG Permitting Rules and drafted PM2.5 NSR provisions.

Completion date: on-going



Next Steps





Strategy

Continue to identify efficiency projects

Assign workgroups/individuals

Collaborate with affected parties

Implement

Evaluate success

Address accordingly



Suggestions