



# Connecticut Department of Energy and Environmental Protection



# Air Permit Amnesty Program for K-12 Schools

March 14, 2013

Jared Millay

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



# 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<sub>x</sub> PTE = 59 tpy

Large Public High Schools



NO<sub>x</sub> PTE = 36 tpy

Co-located Public Schools



NO<sub>x</sub> 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)

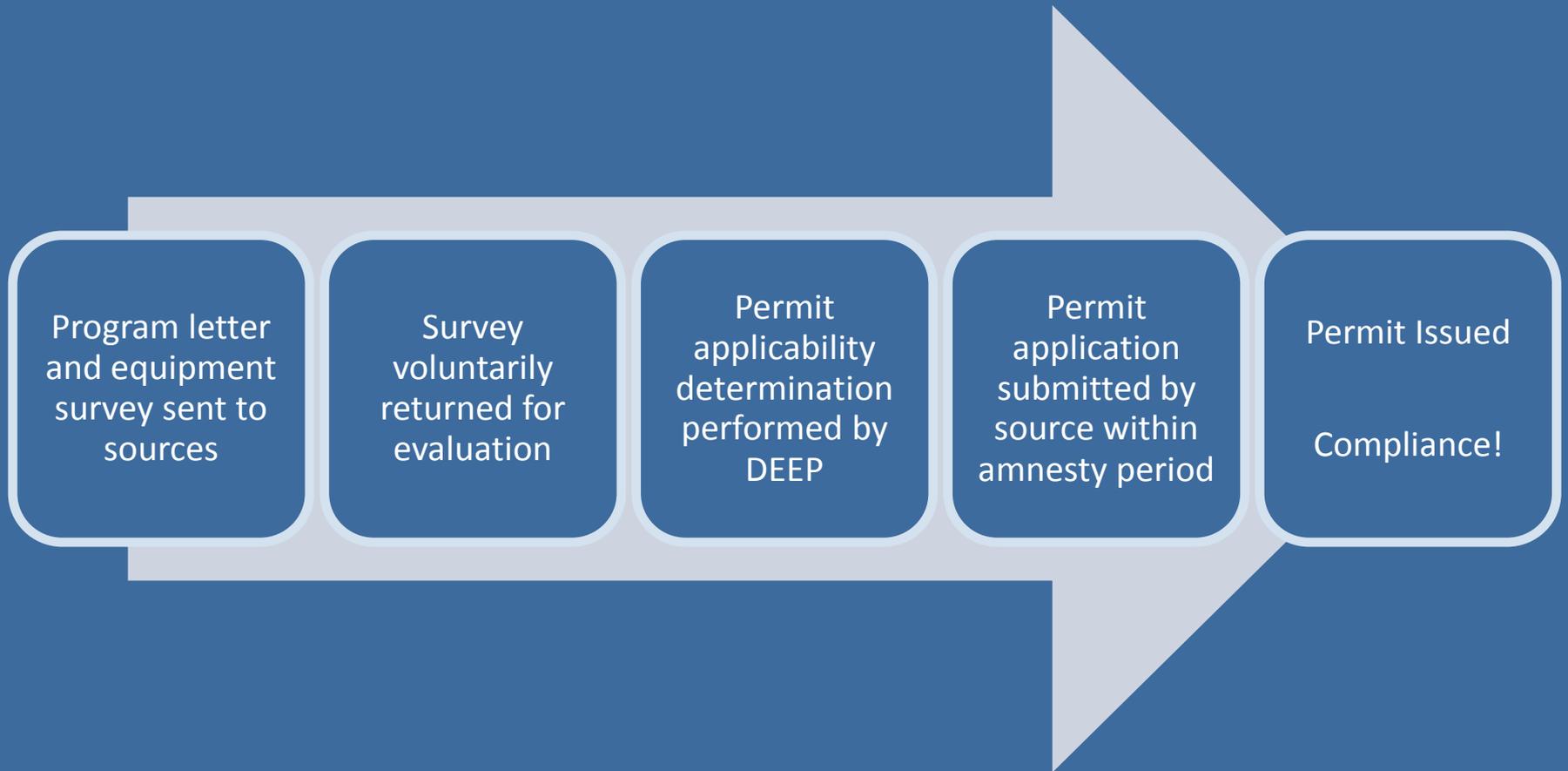


# Incentive-based Approach

- Offer 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



# Amnesty Program Participation

## Program Roll Out

- A program letter and equipment survey was sent to all public school superintendants and heads of private schools in February 2013
- Equipment survey due within 60 days of receipt of letter to initiate participation in program (flexible)
- Schools must also agree to participate in the Connecticut Green LEAF Schools Program



# CT Green LEAF Schools

The Connecticut Green LEAF Schools Program is a collaborative effort of the Connecticut Departments of Construction Services, Education, Energy and Environmental Protection and Public Health, as well as many Connecticut environmental and educational organizations created to promote green and healthy schools for all. The Connecticut Green LEAF Schools Program guides and recognizes schools for striving toward three essential goals:

- Provide effective environmental and sustainability education
- Improve the health and wellness of students and staff
- Reduce environmental impact and cost
  - Energy efficiency assessments



# 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



# 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



# Questions?

Jared Millay

Environmental Analyst 2

[Jared.millay@ct.gov](mailto:Jared.millay@ct.gov)

860-418-5911

