



Connecticut Department of Energy and Environmental Protection



Title V Reporting Survey: Results

1/11/2018
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Connecticut Department of Energy and Environmental Protection

Background

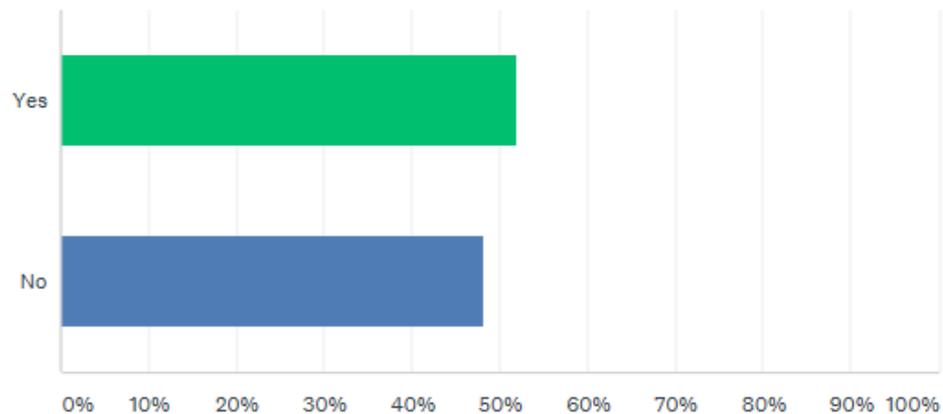
- 2016- DEEP announced mandatory reporting in EMIT for GPLPE Annual Compliance Certifications
- Smooth implementation – nearly 100% of sources complied with requirement
- Based on success with GPLPE sources, decided to pursue same requirement for Title V (TV) sources
- Before imposing new requirement, seek feedback from TV sources



Q1

Has DEEP ever provided your facility with a pre-filled Title V Compliance Certification form based on the most recent version of your facility's Title V permit? [A pre-filled Title V Compliance Certification is a form that is provided by DEEP to the permittee. DEEP fills in all of the conditions of the most recent Title V permit in the left-hand column, and then sends this form electronically to the permittee. This saves the permittee time because they do not need to type out or copy/paste all of the conditions into the form before completing the compliance status information.]

Answered: 56 Skipped: 0



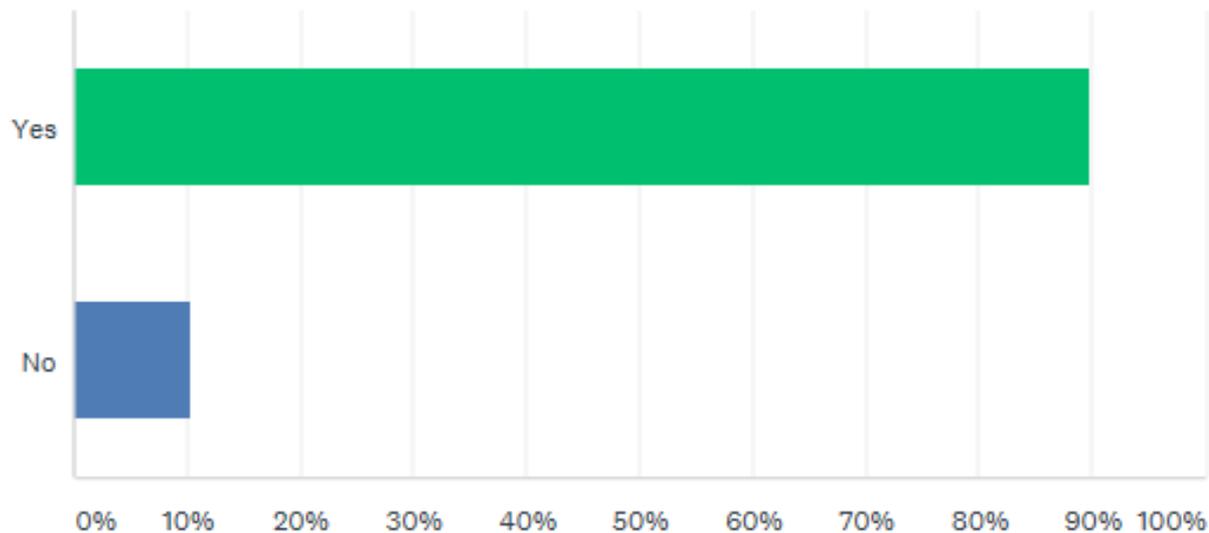
ANSWER CHOICES	RESPONSES	
Yes	51.79%	29
No	48.21%	27
Total Respondents: 56		



Q2

If DEEP has provided your facility with a pre-filled Title V Compliance Certification form, have you used it or will you use it when submitting the annual Title V Compliance Certification?

Answered: 29 Skipped: 27



ANSWER CHOICES	RESPONSES	
Yes	89.66%	26
No	10.34%	3
Total Respondents: 29		



Q3

If you don't plan to use the pre-filled Title V Compliance Certification provided by DEEP, please explain why:

Answered: 3 Skipped: 53

The formatting isn't always correct. So we don't use it the way it comes but take it and rearrange it a bit then use it.

12/14/2017 5:12 PM

I have always needed to modify the pre-filled Title V Compliance Certification provided by the DEEP because the pagination was terrible. Please fix the macro.

12/14/2017 9:44 AM

It's been a few years, but as I recall, the formatting was a little funky & the line by line items were a little off. Needed to be cleaned up. I seem to remember using it as the 'basis' to cut & paste it into a cleaner version to use.

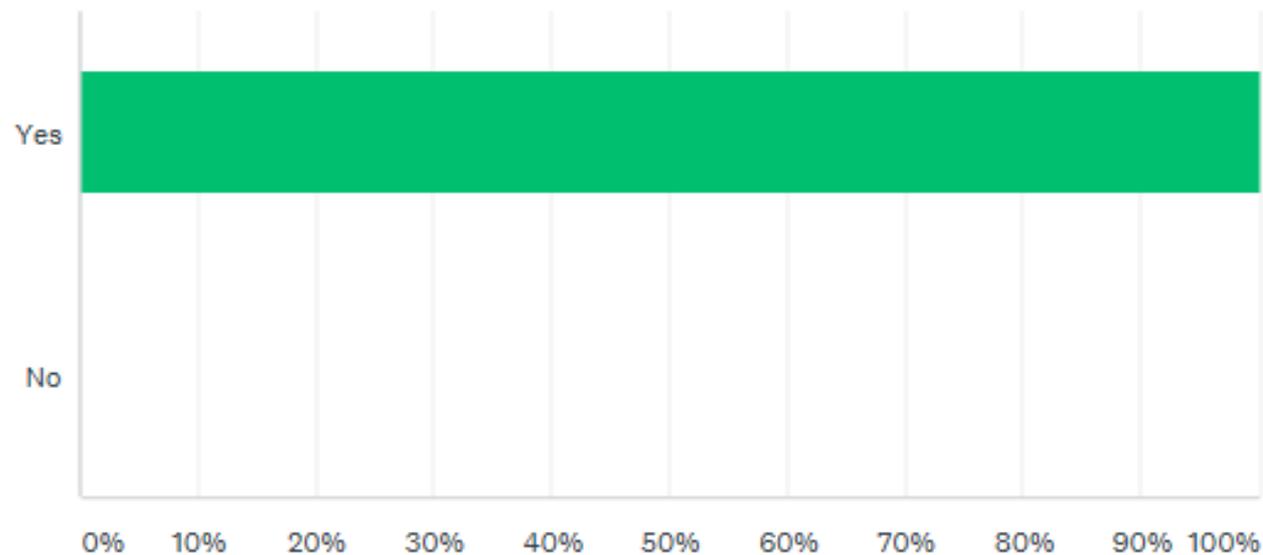
11/13/2017 5:04 PM



Q4

If DEEP has not provided your facility with a pre-filled Title V Compliance Certification form, would you like to receive one?

Answered: 27 Skipped: 29



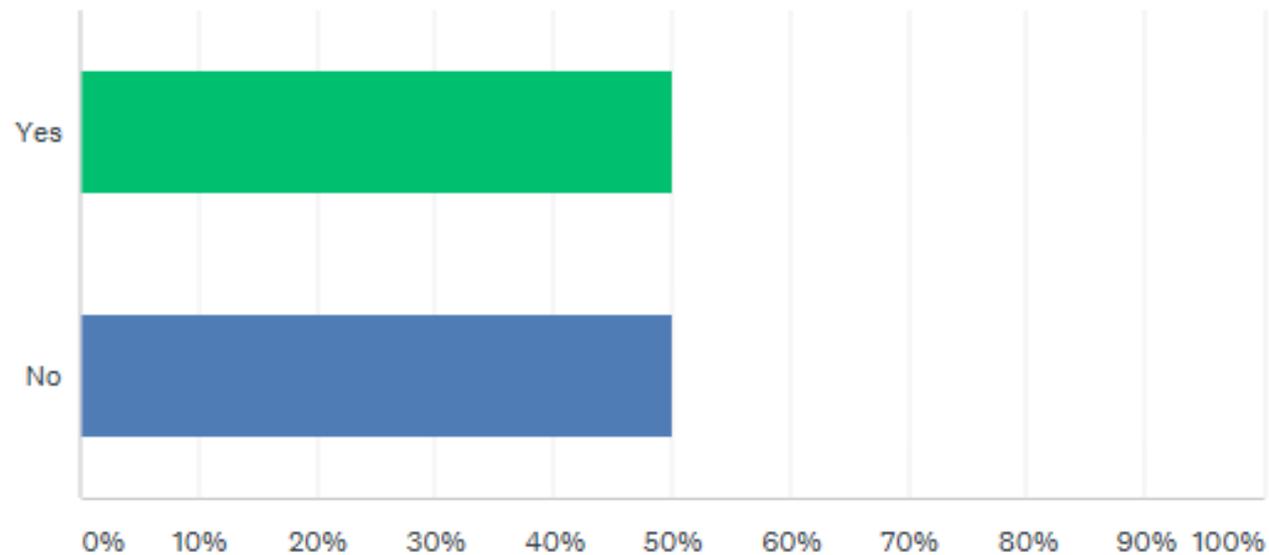
ANSWER CHOICES	RESPONSES	
Yes	100.00%	27
No	0.00%	0
Total Respondents: 27		



Q6

Do you submit Title V Semi-Annual Monitoring Reports and/or Compliance Certifications electronically in EMIT?

Answered: 54 Skipped: 2



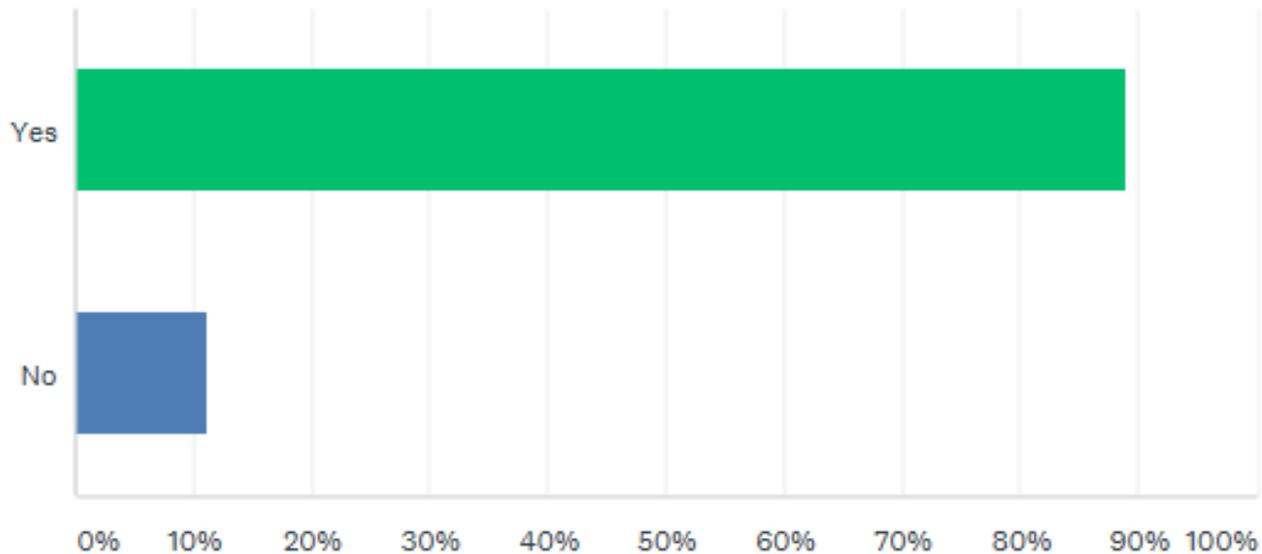
ANSWER CHOICES	RESPONSES	
Yes	50.00%	27
No	50.00%	27
Total Respondents: 54		



Q7

If you do not submit Title V Monitoring Reports and/or Compliance Certifications electronically in EMIT, would you be willing to submit electronically in the future?

Answered: 27 Skipped: 29



ANSWER CHOICES	RESPONSES	
Yes	88.89%	24
No	11.11%	3
Total Respondents: 27		



Q8

If you are not willing to submit Title V reports electronically in EMIT, please explain why:

Answered: 3 Skipped: 53

Our signatory would prefer to sign hard copies.

12/14/2017 5:12 PM

It takes longer to complete the submission using EMIT. It is not flexible to allow for adequate explanations. Also, the last time we tried, it did not distinguish between the preparer and the submitter.

12/4/2017 1:49 PM

Reports have been developed specific to our permit reporting requirements and do not easily transfer to EMIT versions

11/30/2017 1:47 PM



Response Rate

Survey shows 56 responses which actually represent 58 TV sources, since some individuals replied on behalf of multiple sources.

High response rate – 83% (58/70 sources)



Take-Aways

- Pre-filled Compliance Certification (CC) forms are useful, but formatting must be correct.
- All companies that have not received pre-filled CC forms would like to receive one.
- Most sources are willing to submit reports in EMIT.
- The few sources unwilling to submit reports in EMIT listed the following reasons:
 - Signatory prefers to sign hard copies.
 - It takes longer to submit using EMIT. EMIT is not flexible to allow for adequate explanations. Also, EMIT did not distinguish between the preparer and submitter.
 - Source-specific reports have been developed and do not easily transfer to EMIT versions.



Final Decisions

- Provide pre-filled CC forms to all TV sources
- Develop specific procedure for providing the pre-filled CC form upon issuance/renewal/revision of TV permit
 - Staff providing form must check formatting
- Mandatory TV reporting in EMIT next year



Questions?

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