Air Bureau Permit Program Review – Update

July 15, 2010

Public Act 10-158

DEP commence permit timeframe review and report by Sept 30, 2010.

Expedited permitting process pilot for 200+ manufacturing facilities.

Reduce timeframes to identify deficiencies in permit apps and issue TDs.

Identify process improvements, resources and program changes necessary.

Adopt regs schedules for different types of permits. All deficiencies to be identified and sent in writing to applicant w/in 60 days and TD w/in 180 days of sufficiency.

Annual report on failures to meet timeframes.

Do study of CEPA and procedures for GPs with recommendations for revisions to CGS.

DECD permit ombudsman and interagency MOU for process expediting.

DEP consulting services program w no NOVs or civil penalties for minor violations.

Process Improvement Goals

Ensure environmental outcome and adding value

Satisfy full scope of federal obligations, not just permitting

Focus on eliminating waste

Recommendations

- Targeted commitments and timeframes.
- Create a permitting SIPRAC subcommittee to meet regularly to discuss issues affecting efficiency.
- Continue e-Government initiative to include Title V and GPLPE compliance reporting.
- Evaluate opportunities to streamline Title V renewals.
- Evaluate opportunities to improve Title V permit template.
- Website enhancements – Permit Assistance and Transparency

Commitment - Sufficiency

Current State

- Application Signed by Authorized Representative
- Notice of Application Published
- Application Fee Paid
- NOTE: Even if we have sent a notice of administrative sufficiency, nothing precludes the Department from requesting additional technical information during technical review of the application.

Commitment – Sufficiency, continued

Proposed Future State

- All information required by an application form or applicable statute or regulation
- Meets the requirements of any other applicable provision of law governing the form, contents and filing of such application or petition
- Indication of the license or licenses sought
- Reference to the statutes and regulations applicable to the application
- A description of the applicant's proposal and the facilities, activities and sites which are the subject of or are affected by the application
- An executive summary
- A certification by the applicant in accordance with section 22a-3a-5(a)(2).
- Application meet s the requirements of any other applicable provision of law governing the form, contents and filing of such application or petition

Sufficiency – Stop the Clock

Current State

- Call consultant/applicant if notice is not received or missing signature
- Even if we have sent a notice of administrative sufficiency, nothing precludes the Department from requesting additional technical information during technical review of the application.

Proposed Future State

- An Application is Insufficient if it is Incomplete
- Send out a notice of insufficiency
  - list the information that would be required to make the application sufficient
  - give a deadline for the submission of that application
- May either send out a second notice of insufficiency or may reject
- Even if we have sent a notice of technical sufficiency, nothing precludes the Department from requesting additional technical information during technical review of the application.

Technical Review – Stop the Clock

Current State

- Call consultant/applicant
- Send email requesting information
- Move on to another section of application while waiting
- Issues slowing down process
  - BACT documentation, missing forms, missing analyses, selection of equipment

Proposed Future State

- Send out a request for information
  - list the information that would be required to complete review
  - give a deadline for the submission of the information
- May either send out a second request for information or may send out a Rejection Notice

SIPRAC Permit Subcommittee

Sign up procedure

- Send name and e-mail address to Michele Totten at michele.totten@ct.gov.

Standing committee to meet monthly

Schedule first meeting for August 12th

Topics for discussion

- Review of draft Title V permit template
- Greenhouse Gas Tailoring Rule
- Further website enhancements

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E-Government – Compliance Reporting

Title V

- Compliance Certification
- Prompt Deviation Report
- Semi-Annual Monitoring Report

GPLPE

- Annual Emissions Summary
- Compliance Certification
- Notice of Exceedance Report

NOTE: Initiating an effort to engage EPA and stakeholder input.

E-Government – Compliance Reporting

Title V

- Compliance Certification
- Prompt Deviation Report
- Semi-Annual Monitoring Report

GPLPE

- Annual Emissions Summary
- Compliance Certification
- Notice of Exceedance Report

Liz will update you

NOTE: Initiating an effort to engage EPA and stakeholder input.

Title V Improvements

Title V Renewal Process – Tasks Underway

- Reviewing RI's renewal process - **COMPLETED**
- Reviewing RI's renewal applications - **COMPLETED**
- Preliminary discussion with EPA Region I on renewal applications
- Looking at other state's renewal processes to assess if RI benchmark can be improved further

Title V Improvements

Permit Consistency – Work Efforts

- Internal permit workgroup formed to develop template - **COMPLETED**
- Draft permit developed - **COMPLETED**
- Full staff review and comment - **COMPLETED**
- Internal review by Enforcement Section - **COMPLETED**
- Seek input from SIPRAC Permit subcommittee and EPA
- Encourage Title V sources to provide feedback on new template

Title V Improvements

Title V/NSR Program Merge Review

- Reviewing Florida's program - **COMPLETED**
- Contacted Maine to obtain lessons learned - **COMPLETED**
- Contacted EPA Region I
- Identified Issues
  - Kentucky example – the use of Title V petitions to EPA to object to BACT
  - SIP approved states limit EPA NSR objections
  - Is this something sources really want?

Website Enhancement

http://www.ct.gov/dep/cwp/view.asp?a=2684&q=322174&depNav_GID=1619

FAQs

Technical Support

What's New

Permit Assistance

Current Practices to Monitor Permit Timelines

- Title V Tracking
- EPA TOPS
- SIMS Tracking
- EGU Tracking

Next Steps…

- Obtain feedback
- SIPRAC Permit Subcommittee Kick-Off Meeting
- Evaluate staff findings
- Coming in August
  - Lessons Learned
  - Title V Permit File Cabinet
  - MASC Calculator