



# Air Permitting's 90-DAY AGENDA



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Hartford, CT  
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# Purpose

- Support the Commissioner's 100-day agenda
- Initiatives will add to Agency's tool box
- Complete by July 1, 2011





# Permit Assistance Tools

- Develop and make available on Website.
  - Permit Wizard for small businesses
  - Boiler emissions calculator
  - Engine emissions calculator
  - CO2 equivalents calculator
- Demo to Follow





# Technical Assistance Tools

- Provide new technical assistance on the Website
  - Emission Reduction Credit Registry
  - CT BACT Clearinghouse (Demo to Follow)







# Considerations for a Permit-by-Rule

- Release to SIPRAC Permit-by-Rule approaches for
  - Vapor degreasers
    - VOC
    - HAP
  - Combined Heat and Power Units
  - Crematoria



# Develop Standard Operating Procedures

- To support new business elements
  - Pre-Submission Application meetings
  - Technical Sufficiency
  - Minor Modification application forms and instructions
  - Permit revocation forms and instructions





# Title V Improvements

- To foster consistency, develop a template that will
  - Identify and streamline general terms and conditions
  - Incorporate orders, NSPS and MACTs the same
  - Be used as a compliance certification
- Develop streamlined Title V renewal procedures and application forms to present to stakeholders and EPA



# NSR Benchmarking

- Identify and evaluate best practices
  - Northeast States
  - Minnesota
  - Texas
  - Georgia
  - Nebraska
  - California





# **PERMIT LEAN TEAM UPDATE**

**LOU CORSINO**



# Application Review Meetings

- Highly encourage all applicants to schedule an application review meeting 2-3 weeks prior to the submittal of an application
- Developed Guidance and Preliminary Information Form

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Bureau of Air Management - Engineering Group  
79 Elm Street - 5th Floor  
Hartford, CT 06106-5127  
<http://www.ct.gov/dep>

### New Source Review Application Form

The Department strongly encourages all permit applicants, who (NSR) permit application, to schedule an application review meeting two to three weeks prior to submitting an application to the D applicant and staff to discuss the proposed project and to clarify application. Submitting a complete and sufficient application processing of your permit(s). It is also highly recommended application instructions prior to preparing an application.

If you are interested in scheduling an application review meeting, please complete the attached form and submit the form by email to (860) 424-4152. The attached form provides the following information to assist the Department in scheduling your application review meeting:

1. The applicant's name and address;
2. The project contact person's name, address and phone number (to arrange application review meeting);
3. The address and size of the premises where the project is located;
4. A summary of the proposed project including (e.g., fuels, etc);
5. Expected construction date of the proposed project;
6. Proposed project size;
7. Any federal rules that may apply to this project;
8. Any questions or areas of concern that may be discussed during the review meeting by the Permit Engineer as requested.

The project contact person will then be contacted to schedule a review meeting and will be forwarded a standard application review meeting.

During the meeting, the Permit Engineer will discuss the application preparation or permitting process and provide information that will apply to the project.

### New Source Review Application Review Meeting Preliminary Information Form

1. **Applicant**  
Company/Individual Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_  
City/Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
2. **Primary contact (Person to be contacted to arrange application review meeting)**  
Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_  
Company/Individual Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_  
City/Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Business Phone: \_\_\_\_\_ ext. \_\_\_\_\_  
Email: \_\_\_\_\_
3. **Premises Information**  
Premises Name: \_\_\_\_\_  
Premises Address: \_\_\_\_\_ Premises Size:  Major  Minor  
City/Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
4. **Summary of Project (Equipment being installed, sizes, fuels, etc.)**  
\_\_\_\_\_
5. **Expected Construction Date:** \_\_\_\_\_
6. **Proposed Project Size:**  Major  Minor
7. **List any federal rules that this proposed project would be subject to (NSPS, MACT, NESHAP, etc.)**  
\_\_\_\_\_
8. **List any questions or areas of concern that would require additional attention during the application review meeting:** \_\_\_\_\_



# Application Review Meetings

- Meetings can be requested by phone or e-mail
- Once a meeting is requested, the meeting will be assigned to a permit engineer
- Engineer will contact the company to arrange the meeting and forward meeting agenda
- Meeting will consist of discussing the project, reviewing the application forms and answering any questions regarding the application and permitting process
- Engineer that attended the Application Review Meeting will in most cases be the one who will process the application once it is submitted.



# Application Review Meetings

- To be Completed
  - Create a standard meeting agenda for the Application Review Meetings
  - Standard Operating Procedures for Application Review Meetings
  - Incorporate information on both pre-application meetings and application review meetings into NSR instructions



# Sufficiency Review

## Goal

Sufficiency Determination completed within 7 days of assignment to case engineer but no later than 14 days after CPPU receipt date.

NOTE: PA 10-158 requires sufficiency determination completed within 60 days

**PERMIT APPLICATION SUFFICIENCY REVIEW**

Applicant Name: \_\_\_\_\_ Application Date: Date  
 Town: Ashford App No.: \_\_\_\_\_  
 Engineer Name: Engineer Name  
 Review Date: Date

Equipment Description: \_\_\_\_\_  
 Process Type: Process Type  
 If multiple types, explain: \_\_\_\_\_

**Attainment Status**

Ozone Non-Attainment:  Serious  Severe

PM<sub>2.5</sub> Attainment Status:  Attainment  Non-Attainment

Existing Source Emissions (TPY)			
PM <sub>10</sub>	_____	NO <sub>x</sub>	_____
PM <sub>2.5</sub>	_____	CO	_____
SO <sub>x</sub>	_____	VOC	_____
GHG	_____		

	PM <sub>10</sub>	PE @ MRC	Allowable	PM <sub>2.5</sub>	PE @ MRC	Allowable	Comments
Preliminary Emission Estimates (TPY)	_____	_____	_____	_____	_____	_____	
	NO <sub>x</sub>	_____	_____	HAPs	_____	_____	
	SO <sub>x</sub>	_____	_____	Pb	_____	_____	
	VOC	_____	_____	GHG	_____	_____	
	CO	_____	_____	Other	_____	_____	

**Applicability:**

RCSA Section 22a-174-3a(1):  Section \_\_\_\_\_  
 RCSA Section 22a-174-3a:  (X)  (0)  
 NSPS/NESHAP/MACT Subpart(s): \_\_\_\_\_

**Standard Application Requirements:**

Completed and Signed Application  Y  N  A  
 Notice of Application  Y  N  A  
 Email Verification  Y  N  A  
 Application Fee Submitted  Y  N  A  
 Emission Calculations & Documents  Y  N  A  
 MASC Calculations  Y  N  A

**Application Attachments:**

Attachment A: Executive Summary (DEP-AIR-APP-222)  Y  N  A  
 Attachment B: Applicant Background Information (DEP-AIR-APP-008)  Y  N  A  
 Attachment C: Site Plan  Y  N  A  
 Attachment D: USGS Topographic Quadrangle Map  Y  N  A  
 Attachment E: Supplemental Application Forms

- Manufacturing or Processing Operations (DEP-AIR-APP-201)  Y  N  A
- Fuel Burning Equipment (DEP-AIR-APP-202)  Y  N  A
- Incinerators (DEP-AIR-APP-203)  Y  N  A
- Volatile Liquid Storage (DEP-AIR-APP-204)  Y  N  A
- Surface Coating or Printing Operations (DEP-AIR-APP-205)  Y  N  A
- Metal Plating and Surface Treatment Operations (DEP-AIR-APP-206)  Y  N  A
- Metal Cleaning Degreasers (DEP-AIR-APP-207)  Y  N  A
- Concrete, Asphalt Concrete, Mineral Processing and Other Similar Equipment (DEP-AIR-APP-208)  Y  N  A

ment (DEP-AIR-APP-209)  Y  N  A  
 ipment (DEP-AIR-APP-210)  Y  N  A  
 AIR-APP-211)  Y  N  A  
 R-APP-212)  Y  N  A  
 ation Determination Form (DEP-AIR-APP-213)  Y  N  A  
 Determination Form (DEP-AIR-APP-214)  Y  N  A  
 Maintenance Plan  Y  N  A  
 ility Analysis  Y  N  A  
 pliance Information Form (DEP-APP-002)  Y  N  A  
 rmit  Y  N  A  
 ficiency Form (DEP-APP-004)  Y  N  A  
 ew Request Form (DEP-APP-007)  Y  N  A  
 f Preservation Restriction  Y  N  A  
 Justice Public Participation Plan  Y  N  A

chnologies  Y  N  A  
 /Infeasible Options  Y  N  A  
 r Technologies by Control Effectiveness  Y  N  A  
 ve Controls and Document Results  Y  N  A

Analysis of alternatives  Y  N  A  
 Control Technology Review and Approval  Y  N  A  
 Offsetting emission reductions or Emission Reduction Credits  Y  N  A  
 Compliance Requirements  Y  N  A

PSD  Y  N  A  
 Ambient Monitoring  Y  N  A  
 Source Impact Analysis  Y  N  A  
 Analysis of the impairment to visibility, soils and vegetation  Y  N  A  
 Analysis of the ambient air quality impact projected for the area description of  Y  N  A  
 the nature, location, design capacity and typical operating schedule  Y  N  A  
 Others required by the commissioner  Y  N  A

Conclusion:  Y  N  A

Application Sufficient  Application Insufficient

Comments: \_\_\_\_\_



# Sufficiency Review

- Notice of Insufficiency (NOI)
  - Missing information will be required to be submitted within 15 days (starting 5 days after the date on letter) or the application will be rejected
  - For minor mods, letter will state that the 21 day period has not begun
- Notice of Sufficiency (NOS)
  - For minor mods, letter will specify the date when the 21 day period has begun - app receipt date or date missing information from NOI was submitted
- Re-Delegation of Signatory Requirements
- E-mail of Notices



# CT BACT Database

frmMain

## CT DEP BACT DATABASE

Facility Name:

FacilityAddress:

City:

Permit No.

Type:

Issue Date:

Source Size:

Equipment Info **NOx** **CO**

Equipment Description:

Manufacturer:

Model:

Max Capacity:

# of Fuel/Input Types:

Fuel/Input Type #1:

EPA RBLC Process Code:

Fuel/Input Type #2:

EPA RBLC Process Code:

Fuel/Input Type #3:

EPA RBLC Process Code:

**Bact Determinations**

NOx  CO

VOC  Ammonia

PM-10  Other Hap

PM-2.5  GHG

SOx

Record: 6 of 7 No Filter Search



# CT BACT Database

frmMain

## CT DEP BACT DATABASE

Facility Name:   
FacilityAddress:   
City:

Permit No.:   
Type:    
Issue Date:   
Source Size:

Equipment Info **NOx** CO

Control Description:

Control Method:

Concentration Limit	<input type="text"/>	<input type="text"/>	<input type="text"/>
Units	<input type="text"/>	<input type="text"/>	<input type="text"/>
Averaging Time	<input type="text"/>	<input type="text"/>	<input type="text"/>
Mass Emission Rate	<input type="text"/>	<input type="text"/>	<input type="text"/>
Units	<input type="text"/>	<input type="text"/>	<input type="text"/>
LAER?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Annual Emissions (tpy):  tpy

Overall Efficiency (%):

Destruction Efficiency (%):

Capture Efficiency (%):

Cost Effectiveness (\$/ton):

Record: 6 of 7 | No Filter | Search



# CT BACT Database

- Populate the Database
  - Populate with all BACT determinations from new NSR permits issued within the past 5 years
  - Populate with other notable/unique determinations that are not within the past 5 years (power plants, CHPs, biomass, etc)
- Reporting
  - Reports will be developed to meet customer and DEP requirements
- Access to Data
  - Database with searching, browsing and reporting capabilities will be posted to Air Permits website and updated periodically
  - Users will need to have at least MS Access 2007
  - Unfortunately, current DEP website portal can not handle web based search and reporting capabilities

