

# 20 BY 20 RESULTS



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SUMMER 2020

## 20 GOALS TO MEET IN 2020

aimed at increasing **predictability**,  
**efficiency**, and **transparency** of  
DEEP's regulatory processes.

[WWW.CT.GOV/DEEP/20BY20](http://WWW.CT.GOV/DEEP/20BY20)  
[20BY20@CT.GOV](mailto:20BY20@CT.GOV)



SUMMER 2020

## Commissioner's Letter

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Dear Friends,

As summer draws to a close and we continue to tackle the challenges of the COVID-19 pandemic, DEEP remains steadfast in our commitment to the 20BY20 initiative to make our regulatory processes more transparent, efficient and predictable.

We are adapting the way we work to increase our responsiveness to economic recovery needs during and after this public health emergency and to economic development and growth opportunities of communities, businesses, and regulated entities. This attention to the needs of the stakeholders we serve includes prioritizing equity and environmental justice as an integral component of DEEP's mission and programs.

My continued appreciation for the dedication and innovation of our staff and the valuable partnerships with municipalities, businesses and individuals during these difficult months. I am pleased to present this fourth quarterly 20BY20 RESULTS: SUMMER 2020.

Sincerely,

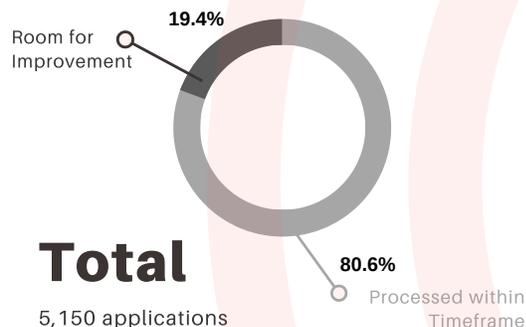
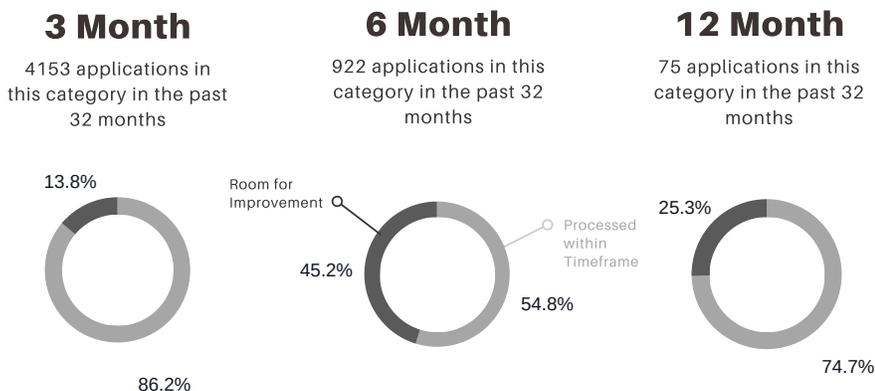
A handwritten signature in black ink that reads "Katie S. Dykes". The signature is written in a cursive, flowing style.

**KATIE DYKES**  
DEEP COMMISSIONER

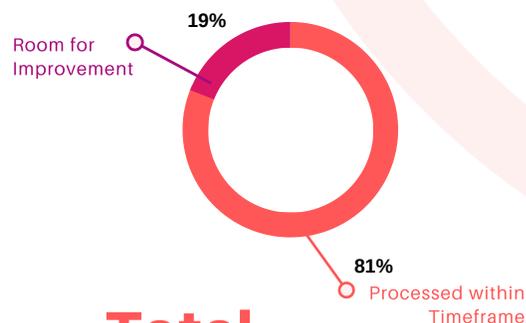
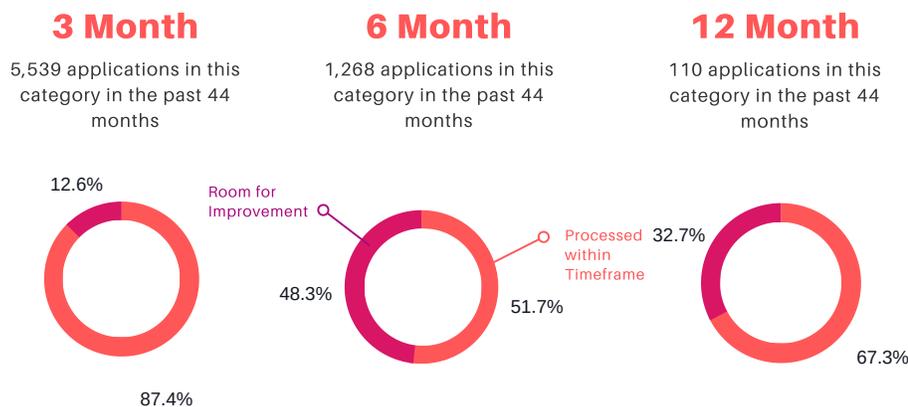
# GOAL 1: MAKE PERMITTING TIMEFRAMES MORE TRANSPARENT

This quarter, consistent with the previous two quarters reported in the winter and spring 20BY20 reports, DEEP continues to process an overall 80 percent of applications within the expected timeframes. During each of those quarters, DEEP received about 1,000 applications and diligently processed 90 percent of the applications. This work by DEEP staff on processing current permits also includes pre-application assistance, legacy permit applications and new streamlined processes such as solid waste renewal applications, general permits, regulations and on-line processes. The 20BY20 initiative categorized permits into four different [Permitting Timeframes](#) - immediate or within 3, 6 or 12 months - based upon the following four criteria: extent of review; public notice needs; level of potential risk to the environment; and technical complexity.

## Baseline



## This Quarter



DEEP's performance in the 3 month category remains strong this quarter at over 87 percent as previously reported in the winter and spring 20BY20 reports. The data continue to show room for improvement in the 6 month category, and permitting managers are tracking this trend and examining process improvement opportunities and resource or priority adjustments to increase the percentage of permits issued within the expected timeframes.

## GOAL 2: ENHANCE PRE-APPLICATION ASSISTANCE

DEEP is maintaining access to services by moving them online and remotely delivering public services that previously required in-person interaction. Among these services, DEEP has maintained its robust pre-application assistance program for businesses requiring environmental permits. These measures will be an important contribution to the state's efforts to promote economic recovery.

Approximately 21 multi-program pre-application meetings have been held in the past 4 months.



### Baseline

96% of applicants reporting their experience as "good," or "excellent" **within last 12 months**



### Last Quarter

97% of applicants continue to report their experience as "good," or "excellent" **within last 4 months**

It is easy to schedule a permit pre-application meeting by filling out a [short questionnaire](#). The responses by the applicant help us ensure staff with the appropriate regulatory technical expertise participate to provide you with the answers you need on your requirements, estimated timelines and necessary DEEP contacts.

We are committed to providing excellent customer service and to making continuous improvements to how we communicate throughout the permitting process. Please remember to complete our survey so that we may continue to improve our process.

# GOAL 3: REDUCE NUMBER OF LEGACY PERMIT APPLICATIONS PENDING

Out of an initial 331 applications pending with DEEP, 242 applications pending (this quarter); **11 applications have been processed during this quarter.**

Legacy permit applications continue to be processed while maintaining processing of current applications at an overall 80 percent on time.

While DEEP continues efforts to reduce the number of legacy permits pending, we are examining the challenges with processing the permits such as necessary regulatory or legislative reforms and identifying strategies for solutions.



## SUCCESS STORY

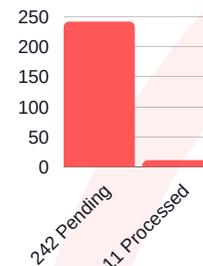
### CITY OF MIDDLETOWN

A complex solution worth highlighting is a recent resolution of a legacy permit through a successful regional collaboration. The legacy permit was for the discharge of the City of Middletown’s wastewater treatment plant. The solution was the elimination of the City of Middletown’s aging and outdated water pollution control facility, and redirection of wastewater flows to the recently upgraded facility owned and operated by the Mattabassett District in Cromwell.

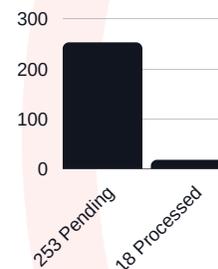
This project removed an existing wastewater discharge out of the Connecticut River, opens up public access to the waterfront and modernizes wastewater treatment to make our communities more resilient and prepared to withstand impacts associated with extreme weather events brought on by climate change. The regional collaboration took place over two decades and finally allowed DEEP to close the legacy application.

## Legacy Permit Applications Pending

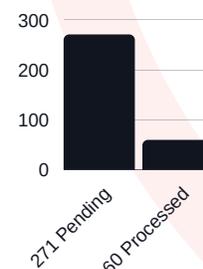
### Summer



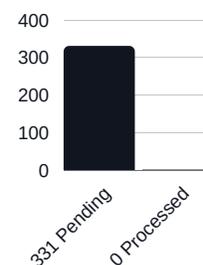
### Spring



### Winter



### Baseline

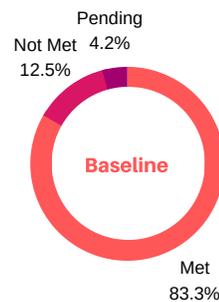


## GOAL 4: REDUCE TIME FOR TRANSFER ACT AUDITS

Percent of filings receiving an audit/no audit decision **within 90 days**

**It is DEEP's goal to achieve this timeframe 100% of the time.**

This quarter, the methodology for an audit timeframe was revised to align with the tracking process used for the permit timeframes in Goal 1. In prior quarterly reports, DEEP reported on the status of verifications submitted in that quarter. The revised method reports on the date that a audit/no audit decision was made within the 90 day timeframe which is a less cumbersome, more straightforward tracking process.



## GOAL 5: FINALIZE RSR AND EUR REGULATIONS

After thorough consideration of the public comments that were received and appropriate revisions and certification by the Office of the Attorney General, the Remediation Standards Regulations (RSRs) and the Environmental Use Restrictions Regulations (EUR) were submitted to the Legislative Regulation Review Committee. We anticipate that the Committee will consider the regulations at their October 2020 meeting.

As background, the RSRs set the standards to which sites must be cleaned up. EURs allow the use of notices that go on the land records. Together, these regulations will ensure environmentally sound standards and greater efficiency of property transfer and redevelopment.

**Together, these regulations will ensure environmentally sound standards and greater efficiency of property transfer and redevelopment.**

## RSRs

Currently at Regulation Review Committee Agenda Stage



## EURs

Currently at Regulation Review Committee Agenda Stage



### KEY

- Baseline
- Q3

# GOAL 6: FAST TRACK SAME-TO-SAME PERMIT RENEWAL TIME

Based upon feedback received from stakeholders last quarter, DEEP has revised the new renewal form for solid waste permitting and the Standard Operative Procedure (SOP) to make it easier to process same-to-same or renewals without modifications. **The revised forms will be released for use by permit applicants by the end of September, 2020.**

Average renewal time for individual solid waste permits falls within the 12 month timeframe. We want to see this number go way down with the implementation of process improvements, with the target timeframe of 9 months or less for a renewal without modification.

## Average Renewal Time

for Individual Solid Waste Permits

THIS QUARTER



12 months

GOAL



9 months

# GOAL 7: CHANGE INDIVIDUAL PERMITS TO GENERAL PERMITS

During the last quarter, DEEP thoughtfully and constructively coordinated with stakeholders during multiple mediation sessions to address both process and technical issues related to the discharging of many common industrial and commercial wastewaters to the sanitary sewer. Through that process, we reached consensus and the request for a hearing was withdrawn. The proposed general permit for Miscellaneous Industrial Users (MIU General Permit) consolidates and streamlines the regulation of thousands of industrial and commercial wastewater discharges to Publicly Owned Treatment Works (POTW) statewide. **The General Permit is expected to be issued by October 2020.**

## Development of Pretreatment Miscellaneous Industrial User General Permit

Currently at Draft Finalization Stage



In the fall, DEEP plans to engage stakeholders to review and comment on the working draft of a newly developed Aquatic Pesticides General Permit. DEEP receives hundreds of applications annually to use approved pesticides to control aquatic plants in Connecticut waters. This new general permit will increase efficiency in processing proposed pesticide uses that are low risk and have minimal effect on the environment and allow staff to focus efforts on the more complex applications.



## Development of Aquatic Pesticides General Permit

Currently at Internal Review Stage

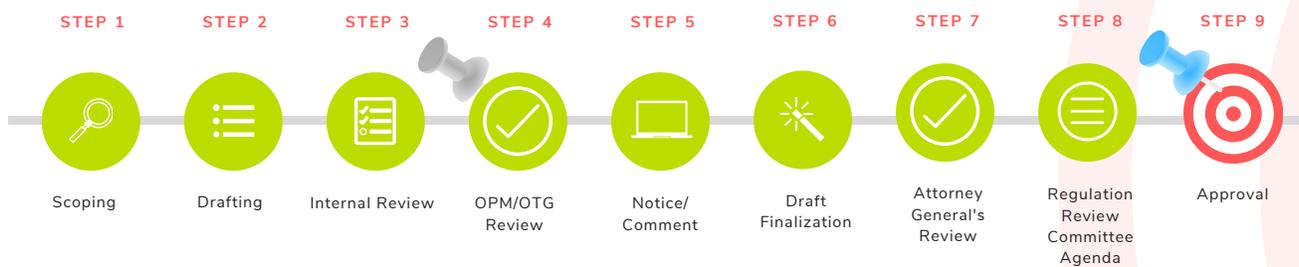


## GOAL 8: ELIMINATE SOME PERMITS AND MOVE TO “PERMIT BY RULE”

The proposed air quality regulation concerning limitations on premises-wide actual emissions below a Title V source was approved during the Legislative Regulations Review Committee’s September 2020 meeting. By converting the General Permit to Limit Potential Emissions (GPLPE), which covers 200 sources, into a regulation while achieving the same level of environmental protection, costs to businesses are reduced by eliminating expenses associated with developing and submitting permit applications and DEEP’s administrative time to process GPLPE applications requiring technical reviews is decreased. This will provide additional DEEP staff time towards improving other processing times and more efficiencies.

### Conversion of General Permit to Limit Potential Emissions

Approved September 2020



## GOAL 9: SIMPLIFY NATURAL DIVERSITY DATA BASE DETERMINATIONS

Last quarter, DEEP introduced for the first time baseline data for the Natural Diversity Data Base (NDDB). DEEP reported that within the past year, the NDDB program received more than 1,000 requests for environmental reviews with 82 percent being closed within a one month timeframe.

The NDDB program performs hundreds of environmental reviews each year to determine the impact of proposed projects on both federal and state listed species and to help landowners conserve the state’s biodiversity. This quarter, DEEP assigned and tracked expected 1,4 and 12 month turnaround timeframes (TAT) for processing NDDB requests based upon the type of species impacted and complexity of the requests.



# Percent of Requests Completed

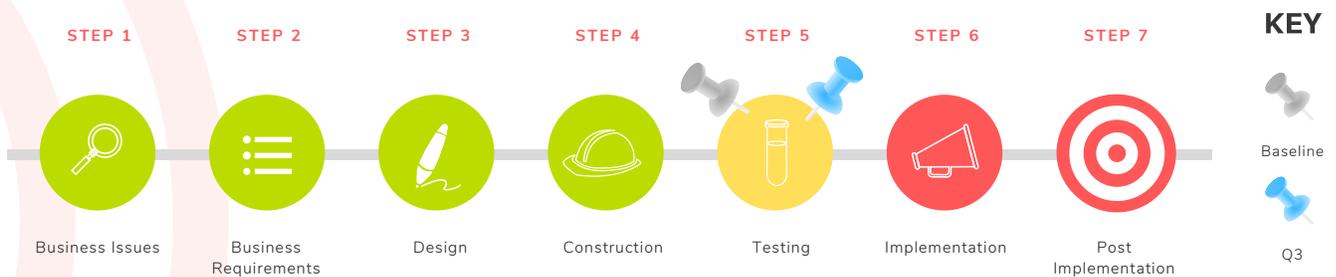
April - June 2020 NDDDB Requests



To help reduce the time it can take to complete the review process, DEEP is developing a self-server user portal that will provide instant responses for less complex projects. This automation should reduce the volume of requests biologists must review manually, providing staff with more time to focus on processing requests with higher levels of complexity.

## Development of the NDDDB Portal

Currently at Testing Stage



The first phase of NDDDB portal testing is complete and work on development of the environmental map layer continues.

**Final system testing, stakeholder engagement, outreach and introduction to the new tool is anticipated this fall, 2020.**

## GOAL 10: INCREASE EFFICIENCY OF GRANT ADMINISTRATION

The COVID-19 pandemic public health emergency accelerated DEEP's need to provide electronic solutions to support the ability of staff to perform their work with minimal interruption while working either fully or partially remotely. DEEP swiftly implemented e-signature and digital routing protocols and is now working to transform some of those temporary improvements into permanent, core business functions for DEEP to ensure the delivery of services.

Specifically, to assist with improved administration, tracking and processing time of outgoing grant and contracts for services, DEEP has embarked on the implementation and utilization of a formal electronic routing and signature tool – DocuSign. DEEP is prioritizing and working on the development and review of Standard Operating Procedures (SOP) for e-routing grants and contracts through the necessary review and approval steps of DEEP as well as other agencies such as the Office of Attorney General and the Office of Policy and Management. The goal is to reduce the amount of time it takes to arrive at the execution of the over 500 contracts DEEP administers each year.

## GOAL 11: AGENCY-WIDE SUCCESSION PLANNING

Related to DEEP's agency-wide succession planning and evaluation of the impacts of attrition on our programs is DEEP's commitment to developing and supporting a diverse and inclusive workforce.

During this second quarter of 2020, DEEP convened an internal workgroup with a focus on workforce diversity. The workgroup had an immediate, prioritized focus on increasing recruitment and hiring of diverse seasonal employees. DEEP strives for diversity throughout the agency, from entry level seasonal positions to senior management. The seasonal workforce diversity initiative established this summer will support the succession planning goal by developing a pool of qualified individuals to conduct core functions and maintain the overall capabilities of the agency now and into the future. DEEP will be stronger with a workforce that is reflective of the public we serve.

## GOAL 12: ESTABLISH PERMITTING CONCIERGE FUNCTION

Last quarter, DEEP launched a new Permitting Concierge Service to provide enhanced support for businesses navigating environmental approval processes and to contribute to the state's efforts to promote economic recovery and growth. The team continues to conduct outreach to organizations and other state agencies such as the CT Environmental Forum and the Departments of Economic and Community Development (DECD) and Department of Transportation and strengthen its interagency and intra-agency coordination and communication. As a single point-of-contact for environmental permit assistance, the team meets on a regular basis with DECD and DEEP managers and staff to proactively plan and identify opportunities for the service to assist projects through the permitting process to meet optimal timeframes. These measures will be an important contribution to the state's efforts to promote economic recovery.

This service is intended for projects that may involve multiple permits and coordination with other state, municipal and federal agencies, such as projects involving economic recovery during/after COVID-19 and those that support economic development. The team can be contacted at [DEEP.Concierge@ct.gov](mailto:DEEP.Concierge@ct.gov) and information can be found [here](#).

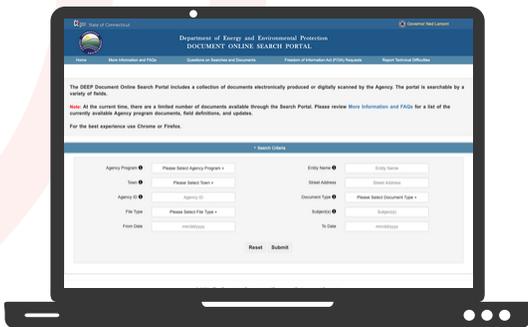
At the same time, program specific, technical permit staff as well as the Client Concierge team remain committed to providing follow up on permit related questions within 48 hours, and ensuring that every applicant knows their DEEP points of contact. At the beginning of the year, DEEP revised the post permit issuance survey to evaluate this deliverable. Out of the survey responses received to date, 71% of applicants stated they know their DEEP technical permit staff contact; 69% reported they received a response to their inquiries submitted to DEEP within 48 hours; and 63% reported they have been satisfied with the permit review process. We want these results to continue to improve, therefore we are considering new ways to effectively liaise with applicants.

# GOAL 13: ACCELERATE E-GOVERNANCE INTEGRATION

As COVID-19 response continues, DEEP's Information Technology, Human Resources and Public Affairs teams successfully support a myriad of needs from across the agency that require quick, innovative solutions such as digital platforms for meetings and collaboration and website support for fast paced posting of pandemic related operational changes available at <https://portal.ct.gov/DEEP/COVID-19/DEEP-COVID-19-Response>. DEEP has responded quickly to provide guidance and regulatory flexibility for regulated entities where appropriate.

Understanding technology can create easier processes and enable re-allocation of staff resources, DEEP continues to invest in Information Technology resources on high-impact e-governance initiatives that create more efficient regulatory processes. One of the current priorities is a more user friendly, streamlined docket system for DEEP's Environment Adjudication unit, Bureau of Energy & Technology Policy, and the Public Utility Regulatory Authority (PURA) - we anticipate the launch of these updated systems in the fall. Another priority, the expansion of the EZ-file system for permitting to five or more additional programs is expected this winter.

# GOAL 14: ENHANCE DATA TRANSPARENCY



**Visit DEEP's  
Document Online  
Search Portal.**

During this time, IT investments and process improvements paid dividends as DEEP staff and stakeholders adapted to remote work.

For example, while DEEP's records center at 79 Elm Street was closed to the public, the digitization of Hazardous Waste Manifests ensured that members of the public would have uninterrupted access to the over 1 million in total documents through DEEP's [Document Online Search Portal](#). Prioritizing digitization of files and making them freely accessible to the public continues to be a priority. This also decreases DEEP staff time focused on managing data requests.

The DEEP GIS Open Data (ESRI) site is now live and accessible directly from the DEEP website as well as highlighted on the main page of the CT Open Data portal. Users can search the open data site for spatial data, download data in a variety of formats (CSV, KML, shapefile, file geodatabase), discover DEEP applications and viewers, and learn more about partnering programs.

**Transparency**

## Documents Digitally Available in DEEP Document Online Search Portal:

**1,161,644 04**  
Baseline



**38,161**  
New documents  
added this quarter

## GOAL 15: DEVELOP PREDICTABLE REGULATION ADOPTION TIMELINE

Stakeholders should know when key milestones for regulation adoption will be completed. DEEP continues to work on the more than 20 regulations that are under development. For continued transparency, a comprehensive list of regulations either in the approval process, or under development are available on [DEEP's website](#).

## GOAL 16: INCREASE STAKEHOLDER ENGAGEMENT IN PROCESS IMPROVEMENT EFFORTS

This quarter, DEEP staff held several Goal focused 20BY20 stakeholder events. For Goal 20, DEEP held a briefing on the proposed draft Release Reporting Regulations to clearly define the releases considered reportable and identify requirements for notifying DEEP and for Goal 7, DEEP convened multiple mediation sessions on the proposed General Permits for Significant Industrial Users (SIU General Permit) and for Miscellaneous Industrial Users (MIU General Permit) which will consolidate and streamline the regulation of thousands of industrial and commercial wastewater discharges to Publicly Owned Treatment Works (POTW) statewide.

In the fall, DEEP will continue to seek opportunities for dialogue regarding 20BY20 priorities through large forums such as Hazardous Waste and Solid Waste Advisory Committees, SIPRAC and Remediation Roundtable.

**To receive updates on opportunities for stakeholder participation in 20BY20 initiatives, please register for our email list at [www.ct.gov/DEEP/20BY20](http://www.ct.gov/DEEP/20BY20).**

## GOAL 17: INCREASE THE TRANSPARENCY OF ENVIRONMENTAL ENFORCEMENT ACTIVITIES

To protect our environment and natural resources during the pandemic, DEEP continues to monitor adherence to environmental statutes and regulations through the variety of our strong compliance assurance tools. DEEP staff conduct field inspections when they can practice appropriate social distancing and other necessary safety measures as well as focusing on monitoring through audits of facilities that includes analysis of available emission data and site records. Effective compliance monitoring and deterrence continue to be essential ingredients of a strong enforcement program.

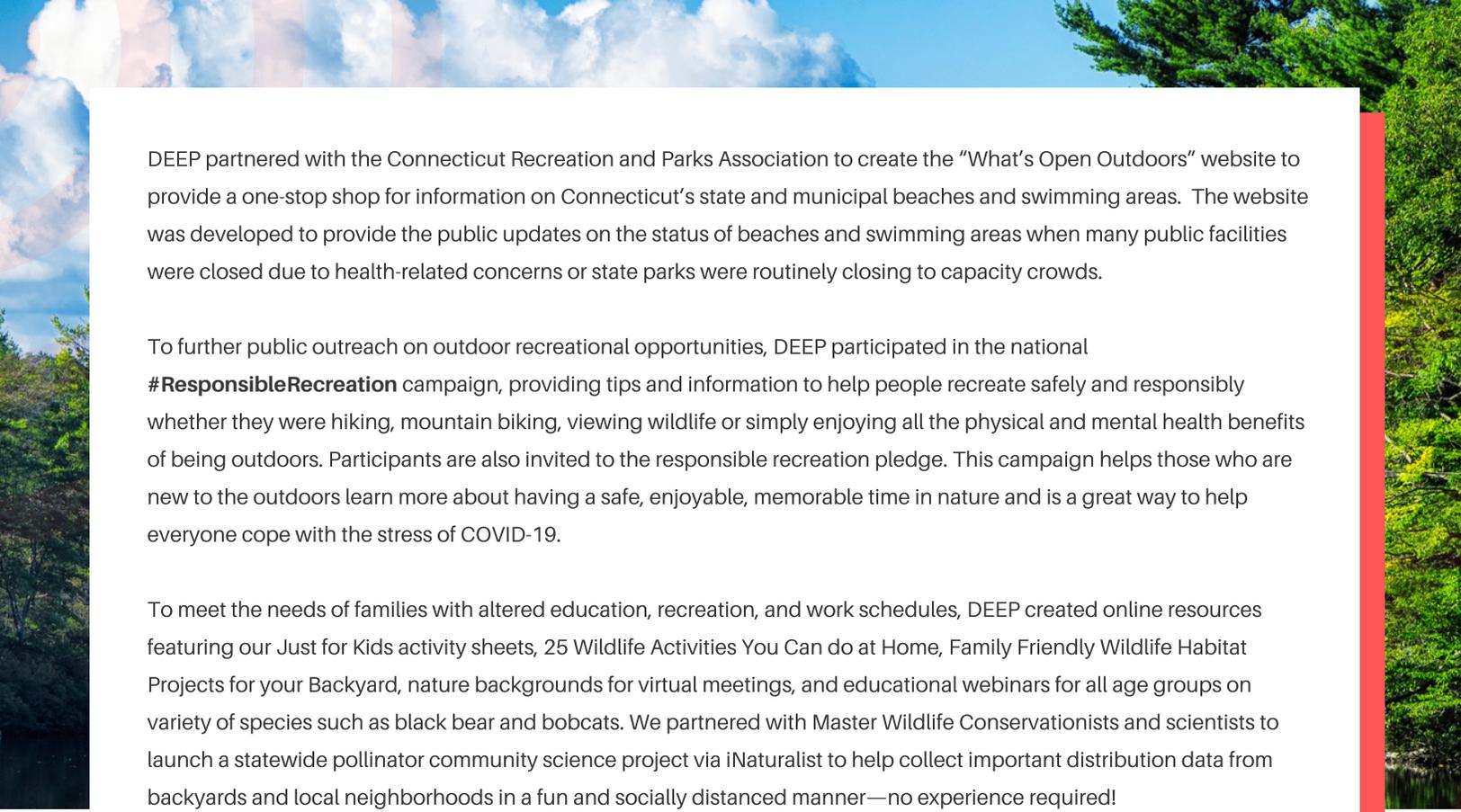
Regarding the availability and access to DEEP enforcement and compliance information and data, in addition to the formal enforcement actions and statistics posted on DEEP's website, this quarter we have introduced an additional tool with valuable data available for communities and regulated entities to access - [Enforcement and Compliance History Online](#).

Enforcement and Compliance History Online (ECHO) provides fast, integrated searches of EPA and state data for more than 800,000 regulated facilities including CT data provided by DEEP into the federal databases. ECHO focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), Clean Water Act (CWA) and Resource Conservation and Recovery Act (RCRA) and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data.

**DEEP is working to revise the accessibility of enforcement and compliance information available on DEEP's website and seeking additional opportunities to communicate significant enforcement milestones.**

## GOAL 18: SEEK OPPORTUNITIES FOR INNOVATIVE PARTNERSHIPS TO ENHANCE SERVICES

This summer, to meet the increasing demand from the public for outdoor recreation, DEEP ramped up innovative, valuable partnerships to promote and enhance access to outdoor recreation resources and destinations. During the second quarter of 2020, DEEP partnered with the CT Outdoor Recreation Alliance (CORA), to share ideas, review operational plans and discuss best practices on the reopening of outdoor recreation activities and facilities impacted by COVID-19. Regular meetings paired DEEP staff with outdoor recreation leaders and advocates with a common goal of sustaining and enhancing safe public access to the outdoors while supporting the outdoor recreation industry.



DEEP partnered with the Connecticut Recreation and Parks Association to create the “What’s Open Outdoors” website to provide a one-stop shop for information on Connecticut’s state and municipal beaches and swimming areas. The website was developed to provide the public updates on the status of beaches and swimming areas when many public facilities were closed due to health-related concerns or state parks were routinely closing to capacity crowds.

To further public outreach on outdoor recreational opportunities, DEEP participated in the national **#ResponsibleRecreation** campaign, providing tips and information to help people recreate safely and responsibly whether they were hiking, mountain biking, viewing wildlife or simply enjoying all the physical and mental health benefits of being outdoors. Participants are also invited to the responsible recreation pledge. This campaign helps those who are new to the outdoors learn more about having a safe, enjoyable, memorable time in nature and is a great way to help everyone cope with the stress of COVID-19.

To meet the needs of families with altered education, recreation, and work schedules, DEEP created online resources featuring our Just for Kids activity sheets, 25 Wildlife Activities You Can do at Home, Family Friendly Wildlife Habitat Projects for your Backyard, nature backgrounds for virtual meetings, and educational webinars for all age groups on variety of species such as black bear and bobcats. We partnered with Master Wildlife Conservationists and scientists to launch a statewide pollinator community science project via iNaturalist to help collect important distribution data from backyards and local neighborhoods in a fun and socially distanced manner—no experience required!

**As we adapt our business practices to address the challenges of the current pandemic, we are developing new approaches and expanding remote learning capabilities to make outdoor recreation more accessible to new and returning hunters and anglers.**

These new practices are being adopted and applied by our longstanding partners in the conservation community, through expanded online offerings coupled with targeted and efficient hands-on learning. The feedback we are receiving from both our partners and students is positive and encouraging. As a result, these new practices will be incorporated into our normal business practices for outdoor adventure training.

## **GOAL 19: ENHANCE USE AND EASE OF FINANCIAL ASSURANCE MECHANISMS AS PART OF PERMITTING AND ENFORCEMENT**

DEEP has developed a Standard Operating Procedure (SOP) for staff to consistently inventory and process financial assurance instruments. DEEP continues to work on reviewing the types of financial instruments utilized by various programs and develop templates, as needed; identifying the circumstances that warrant reliance upon a financial assurance mechanism; and developing Frequently Asked Questions (FAQs) for the regulated community to strengthen the transparency, consistency and predictability on DEEP’s the use of financial assurance mechanisms.

# GOAL 20: UPDATE SPILL-REPORTING REGULATIONS.

Updates to release reporting regulations will ensure clear and concise standards pertaining to reporting of future releases of threshold amounts of common substances such as oil, petroleum chemical liquids and harmful hazardous waste. This summer DEEP staff convened a stakeholders meeting on the key issues of the draft proposed regulations. Staff presentation can be found [here](#). Public comments were accepted until late August. DEEP will review and consider the comments received on the key issues before commencing formal rule making.

## Spill Reporting

Currently at Internal Review Stage



## THANKS FOR READING.

*We look forward to sharing our final 20BY20 Results with you.*

## Future Report Releases

January 2021

Report Design: Rose Croog



**20 BY 20**

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