Improved Title V Inspection Process - What Has Changed?

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Why Were Improvements Necessary?

• Encountered a significant change in our business
• Steady adoption of numerous complex federal requirements
• Challenge to effectively determine compliance with these new requirements was not effectively met by existing inspection program
How do we all benefit from a thorough facility compliance evaluation?

• Assured compliance with requirements leads to a cleaner environment

• Business and industry want to know their obligations so they can do the right thing

• The sooner they are made aware of non-compliance or pending requirements they can act to address

• Quality inspection program is critical to satisfy EPA requirements and obligations
Pursuing Quality Improvement Through the LEAN Process

Project Team Charter

Opportunity for Improvements -
• Redirect TV full compliance evaluation inspections to fully document compliance status for all applicable requirements in the most efficient manner possible.

Project Scope -
• Improve TV compliance evaluation process including:
  Better inspection preparation through internal coordination
  Standardization of report format and level of quality
  Develop standard operating procedures
  Provide better training and enforcement tools
  Standardization of TV permit drafting
Inspection Program has Many Customers

• Internal Customers
  – Field Inspector
  – Permit staff
  – Enforcement staff

• External Customers
  – Facility
  – EPA
  – Public
Products from TV Full Compliance Evaluation Lean Project

1. Assembling all necessary information and documentation (PIT Crew Binder)
2. Creating Title V Compliance Checklist
3. Improving Inspection report quality and format
4. Standardizing Opportunities
   – Title V Permit
   – Compliance Certification
Process Improvement Team (PIT)

PIT Crew
• Compile facility binder including:
  – Active Permits
  – Applicable Regulations
  – Active Enforcement Orders
  – Testing Results
  – Compliance History
• Enhance communication between units
• Provide necessary training and tools
Inspection Report Quality and Format

- Standardized format ensures required audit objectives are met and properly documented
- Designed to prevent duplication of efforts
- Delineates which documents are official parts of the report, including calculations
- Completed Compliance Checklist becomes central part of the report
- Federal requirements clearly identified
- Standard format for narrative
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**EMISSIONS CALCULATIONS:**

(Please indicate in detail what data and or methods were used to calculate the actual emissions listed above.) The potential emissions calculations are provided in Attachment E

**Applicable Requirements/Programs:** *(Specific applicable federal subparts shall be identified.)*

- 40 CFR Part 60 (NSPS) Subpart(s): □
- 40 CFR Part 61 (NESHAP) Subpart(s): □
- 40 CFR Part 63 (MACT) Subpart(s): □
- 40 CFR Part □ Subpart(s): □

The inspection report for the full compliance evaluation is a compilation of documents in addition to this narrative. When included, these lettered attachments are an integral part of this report:

- [ ] Pre-Inspection Questionnaire Attachment A
- [ ] Compliance History Report Attachment B
- [ ] Title V Documentation ( [ ] Compliance Certification, [ ] Permit, [ ] Checklist) Attachment C
- [ ] Checklist for federal requirements (NSPS, NESHAP, MACT) Attachment D
- [ ] Potential Emissions Calculations Attachment E
- [ ] Calculations and Notes Attachment F through □

FE-11 revised 5/10/2011 for full compliance evaluations

Supervisor initial and date: □
FACILITY DESCRIPTION:
Additional information provided in the Attachment lettered

FACILITY WALK THROUGH:
Additional information provided in the Attachment lettered

RECORDS ASSESSMENT:
Additional information provided in the Attachment lettered

REVIEW OF PREMISE WIDE REQUIREMENTS:
Additional information provided in the Attachment lettered

AIR PROGRAM COMPLIANCE HISTORY:
Additional information provided in the Attachment lettered

CHANGES, NEW EQUIPMENT, ANTICIPATED REVISIONS & CHANGES IN OWNERSHIP:
Additional information provided in the Attachment lettered

STATE ONLY REQUIREMENTS:
Additional information provided in the Attachment lettered

VIOLATIONS NOTED:
Additional information provided in the Attachment lettered

CONCLUSIONS & RECOMMENDATIONS:

Engineer Signature: ___________________________ Date: __________
Supervisor Approval: _________________________ Date: __________
Opportunities to Standardize

Title V Permit:

• Title V Permit main compliance assurance tool for field engineers and facility contacts

• Regular Communications between Engineering and Field Enforcement necessary to ensure overall quality of TV Permits and Inspections

• Permit engineers teamed with field engineers to perform inspections using permits they drafted
Opportunities to Standardize

Compliance Checklist
- Being tailor made from each Title V Permit

Compliance Certification (CC)
- Currently facility produced and not standardized

Future State
- Standardized Title V permit format
- CC document provided with issued Permit
- Compliance Checklist provided with issued Permit
How Does this Benefit Customers?

- Permit Engineers able to write more useful permits (Title V and NSR)
- Cuts down on violations
- Aligns Permits with Enforcement
- Consistent interpretation of regulations
- Helps with internal training