NSR LEAN Forms Update

January 10, 2013
Louis Corsino III
SIPRAC January 2013
BACT Forms

• New BACT Forms were introduced at November 2012 SIPRAC Meeting
• The forms were sent out to SIPRAC email list in December 2012 and comments are due by January 17, 2013
• Direct all comments to Debola Bamgbose: adebola.bamgbose@ct.gov
NSR Forms

• As a result of our NSR LEAN event, it was found that our NSR forms did not provide the opportunity for the applicant to provide all information necessary to process an application in a timely manner.

• It was also noted that the forms were not user friendly and they presented challenges while filling them out.
History

- One Page Permit Application (Pre-CAA of 1990)
History

• **Mid-1990s – 2012** (Post-CAA of 1990)
  – Expanded Application forms in order to ensure new sources comply with various new regulatory requirements
Today

• 2013 – Improved and more complete application
Future

- Our Ideal State – full online submittal of applications
- Automatic sufficiency checks
- Electronic Workflow
- The refreshing of our forms now allows us to be ready for the future online permitting system being developed
Goal of Updated Forms

- The goal is to issue better permits faster.
- We need to eliminate as much “non-DEEP” time as possible.
  - Insufficiency and Additional or Missing Info Requests

![New NSR Applications - Total Days to Issue](image)

Connecticut Department of Energy and Environmental Protection
What Did We Do?

• Updated to make forms more user friendly
• Reorganized visually and logically
• Refined and expanded supplemental forms where needed
• Consistent language across all forms
• Attachment checklist at the end of each form, if necessary.
Examples of Updated Forms

Supplemental Application Form
Fuel Burning Equipment

Applicant Name: (As indicated on the Permit Application Transmittal Form (DEP.APR-001))

Complete a separate form for each fuel burning unit. (Duplicate this form as necessary.)

Unit Number: (As indicated on the Permit Application Form (DEP.AIR-AFP-200))

Section I: General

1. Type of Unit (check one): ☐ Boiler ☐ Heater/Furnace ☐ IC Engine ☐ Turbine
2. Unit Manufacturer and Model Number:
3. Construction Initiation Date: / / 
4. Is this unit subject to Title 40 CFR Part 60, NSPS? ☐ Yes ☐ No
   If yes, indicate the subpart(s):
5. Is this unit subject to Title 40 CFR Part 63, NESHAP? ☐ Yes ☐ No
   If yes, indicate the subpart(s):
6. Maximum Design Heat Input: MMBTU per hour
   Typical Heat Input: MMBTU per hour
7. Maximum Operating Schedule: hours per day hours per year
8. Percentage of Annual Use in Each Category:
   Space Heat: % Process Heat: % Power: %

Section II: External Combustion Unit – Firing Method

1. Burner Manufacturer and Model Number:
2. Maximum Rated Capacity per Burner: MMBTU per hour; Number of Burners:
3. Oil/Gas-Fired Unit: Indicate the firing method.

Complete this form in accordance with the instructions (DEEP-AIR-INST-202) to ensure the proper handling of your application. Print or type unless otherwise noted.

Complete a separate form for each fuel burning source.

Questions? Visit the Air Permitting web page or contact the Air Permitting Engineer of the Day at 860-424-4152.

Connecticut Department of Energy and Environmental Protection
Examples of Updated Forms

Before

Supplemental Application Form
Unit Emissions

Applicant Name:
(As indicated on the Permit Application Transmittal Form (DEP-APP-001))

Complete a separate form for each unit.
(Duplicate this form as necessary.)

Unit Number:
(As indicated on the Permit Application Form (DEP-AIR-APP-200))

Section I: Unit Emission Information

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential Emissions at Maximum Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pounds Per Hour (a)</td>
</tr>
<tr>
<td>Particulate Matter Less Than 10 Micrograms (PM10)</td>
<td></td>
</tr>
<tr>
<td>Particulate Matter Less Than 2.5 Micrograms (PM2.5)</td>
<td></td>
</tr>
<tr>
<td>Sulfur Oxides (SOx)</td>
<td></td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td></td>
</tr>
</tbody>
</table>

After

Supplemental Application Form
Unit Emissions

Applicant Name:

Unit No.:

Complete this form in accordance with the instructions (DEEP-AIR-INST-212) to ensure the proper handling of your application. Print or type unless otherwise noted.

Questions? Visit the Air Permitting web page or contact the Air Permitting Engineer of the Day at 860-424-4152.

Part I: Unit Emission Information

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential Emissions at Maximum Capacity</th>
<th>Proposed Allowable Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>lb/hr</td>
<td>tpy</td>
</tr>
<tr>
<td>Criteria Air Pollutants</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Hazardous Air Pollutants |

Connecticut Department of Energy and Environmental Protection
Example of Updated Forms

Before
Attachments buried in instructions

After
Attachments clearly defined on form itself

Connecticut Department of Energy and Environmental Protection
Submit one hardcopy or electronic copy (in the form of a CD) of the completed application package. If submitting an electronic copy, forms requiring signatures should be submitted as hardcopies and such forms should also be scanned for electronic submission. The Department of Energy and Environmental Protection (DEEP) encourages all applicants to submit their application electronically.
New/Revised Forms

- Premises Information Form (NEW)
- Major Modification Form (EXISTING)
- PSD Review Form (NEW)
- Non-Attainment Form (NEW)
Premises Information Form

• Currently we do not know what equipment exists at a non-Title V/GPLPE site due to Sections -3b and -3c.
• Form allows us to obtain an accurate snapshot of the current premises potential emissions.
• GPLPE sources do not have to complete the form.
• Title V sources only need to provide their current potential emissions.
Premises Information Form

• Will obtain potential emissions for:
  – Permitted units
  – Registered units
  – Permit by Rule sources (-3b, -3c)
  – Sources that do not trigger permit applicability
  – Premises wide annual emission limitations in NSR permits or orders

• Final part of form will direct applicant to fill out other required forms (Major Mod, PSD, Non-Attainment)
Major Modification Form

• Updated to include an applicability section.
• The major modification calculation worksheet has been separated as this needs to be completed for each applicable pollutant.
• A table on the main form summarizes the results from the calculation sheets and directs the applicant to additional forms to be completed.
Non-Attainment and PSD Forms

• Applicability section
• List of required attachments.
• Because no forms previously existed for these reviews previously, it was common for some of these required attachments to be missing in a permit application.
Request for Volunteers

• Looking for 3-4 volunteers with previous major NSR application experience to review the new Premises Information, Major Mod, PSD and Non-Attainment Forms.

• If interested send email to louis.corsino@ct.gov
Questions?

Louis J. Corsino III
APCE II
louis.corsino@ct.gov
860-424-3544
www.ct.gov/deep/airpermits