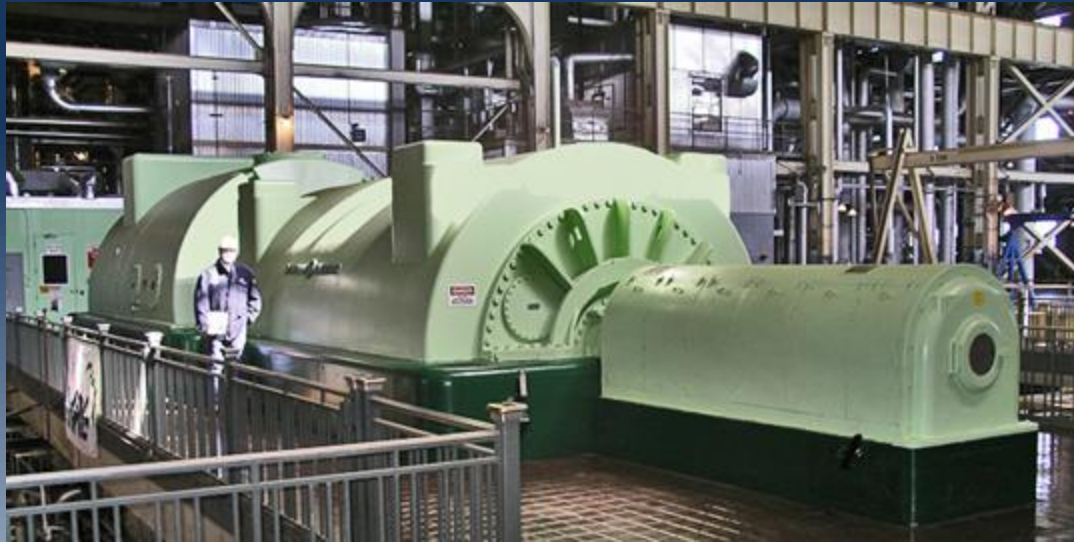




Air Bureau Permit Program Review – Update



June 10, 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



Permit Timeframes Proposed Commitments

New Source Review

- Administrative Sufficiency – 30 days
- Technical Sufficiency – 60 days
- Technical Review – 180 days minor, 365 days major

Title V/Title IV/CAIR

- Programs are being merged into single permit
- Maintain current regulatory timeframes and commitments
 - Technical Sufficiency – 60 days, includes application shield
 - Issuance – new w/in 18 months, renewals w/in 12 months



Permit Timeframes – FY10 Commitments to EPA

New Source Review

- 78% of major NSR permits are issued within 12 months

Title V

- 100% of non-minor mods are issued within 18 months
- 94% of new TV permits are issued within 18 months
- 94% of TV renewals are issued within 18 months



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



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.



Title V Improvements

Title V Renewal Process – Tasks Underway

- Reviewing RI's renewal process
- Reviewing RI's renewal applications
- 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
- Draft permit developed
- Full staff review and comment
- Internal review by Enforcement Section
- Seek input from SIPRAC Permit subcommittee
- Encourage Title V sources to provide feedback on new template



Title V Improvements

Title V/NSR Program Merge Review

- Reviewing Florida's program
- Contacted Maine to obtain lessons learned
- 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?

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Air



Today's Air Quality Index



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View current CT Air Regulations, SIP Revisions, regulations in development and more.

[Air Permitting](#)

Download air permitting forms and current Title V Permits, review permitting guidance, policies and procedures and more.

[Air Compliance and Source Monitoring](#)

View guidance and download compliance and source monitoring and reporting forms, download emission statement guidance, access EMIT and more.

[Air Enforcement](#)

View enforcement case studies, information on outdoor wood burners, anti-idling efforts, file a complaint and more.

[Air Quality & Health Effects](#)

View webcams from around CT, view the Air Quality Index, and learn more about the health effects of air pollution in CT.

[About Us](#)

What does the Bureau of Air Management do? A summary of inner workings of the various air sections.

[SIPRAC](#)

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Air Permitting



**Need Permitting Help or
Have a Permitting Question?**

Call the Engineer of the Day at:

(860) 424-4152

A variety of air quality permits are issued to ensure that emissions from new, modified or existing sources of air pollution do not harm public health or cause significant degradation to air quality. These permits contain requirements to limit emissions either through control technologies or operational limitations and a means to assure compliance. The criteria for issuing permits and for defining permit requirements for new or modified facilities are specified in [regulations](#). The DEP air permit staff who perform the permit reviews and administer the program are available to assist you and answer questions.

All permits are issued in accordance with applicable Connecticut and Federal regulations and in accordance with our mission and responsibility to the citizens of Connecticut to protect the environment and public health.

[CT Air Regulations](#)

View current CT Air Regulations, SIP Revisions, regulations in development, CT DEP comments on federal air regulations and more.

[Title V Permits](#)

View and download active Title V Permits that have been issued in CT.

[What's New in Air Permitting?](#)

Current news articles and topics relating to air permitting in CT.

[SIPRAC](#)

SIPRAC is the Air Bureau's standing advisory committee on Connecticut's implementation of the Clean Air Act. View upcoming meeting dates and archived meeting agendas and information.

[Frequently Asked Questions About Air Permits.](#) **COMING SOON**

[Air Permitting Forms](#)

Download relevant forms for permitting a source of air pollution including New Source Review Permits, General Permits, Acid Rain Permits, Title V Permits and more.

[Air Permitting Guidance](#)

Request a pre-application meeting, links to CT DEP Fact Sheets, permitting guidance documents, relevant federal regulations and emission factors, estimated permitting timeframes, and other tools to aid you in preparing your permit application.

[Air Technical Support](#)

Stack testing guidance, modeling guidance, CEM guidance and other relevant CT DEP technical and guidance documents.

[About Air Permits](#)

An explanation of the various types of Air Permits available.

[Contact Us](#)

A list of permit staff. **COMING SOON**

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Air Permitting Guidance



**Need Permitting Help or
Have a Permitting Question?**

Call the Engineer of the Day at:

(860) 424-4152

Request a Pre-Application Meeting

If you would like to meet with a CT DEP permit engineer to discuss permitting issues regarding your source, including discussion on forms, permitting options and general guidance on the permitting process, you can request a Pre-Application Meeting by calling (860) 424-4152.

Permitting Status

COMING SOON! Snapshot of Permit Statuses.

Permitting Guidance

[EPA NSR and PSD Policy and Guidance Interpretation Documents](#)

COMING SOON! Permit Options Flow Chart

COMING SOON! Non-Attainment Effects on Permitting

Fact Sheets and Forms

[Air Permitting Forms](#)

[Metal Cleaning, RCSA §22a-174-20\(l\) Control of Organic Compound Emissions \(2/15/08, PDF\)](#)

[Minor Source Air Permitting Requirements for Incinerators Constructed on or after June 1, 2009 \(6/1/09, PDF\)](#)

Federal Regulations

The following links take you to various relevant federal regulations:

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Air Technical Support



Modeling Guidance & Data

[CTDEP Modeling Guidance Document](#) (PDF)

[CTDEP Interim PM2.5 New Source Review Modeling Policy and Procedures](#) (PDF)

[Background Air Quality for Modeling](#)

[Meteorological Data](#)

[EPA Air Quality Modeling Information](#)

Stack Testing Forms & Guidance

[Emissions Test Guidelines](#) (PDF)

[Emission Testing or CEM Intent-to-Test Transmittal Form](#) (PDF)

CEM Forms & Guidance

[Emission Testing or CEM Intent-to-Test Transmittal Form](#) (PDF)

Related Programs and Guidance

[Environmental Justice Policy](#)

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What's New in Permitting?



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Air Permitting Process Assessment

May 13, 2010

The Air Bureau presented a review of the air permitting program at [SIPRAC](#). Please see the following presentation for more information: [Air Bureau Permit Program Review - May 2010](#) (PDF)

June 10, 2010

Air Permit Review Update (PDF) **COMING SOON**

GHG Tailoring Rule Implementation (PDF) **COMING SOON**

Archived News

Old news will be archived

Content Last Updated June 8, 2010

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About Air Permits



**Need Permitting Help or
Have a Permitting Question?**

Call the Engineer of the Day at:

(860) 424-4152

The DEP Bureau of Air Management issues permits in accordance with the Connecticut General Statutes and the Abatement of Air Pollution Regulations. Permits are licenses that allow the owner or operator of a new or existing source to operate a stationary source or group of stationary sources that emit or have the potential to emit air pollution. The permit may include terms and conditions that cover the construction and operation of such stationary source(s). Examples of stationary sources are fuel burning units such as boilers or industrial manufacturing process lines in a factory.

General permits are permits issued to authorize similar activities by one or more applicants throughout a prescribed geographic area. Authorization of an activity under a general permit is governed by that general permit. General permits are a quicker and a cost effective way to permit specific activities for the applicant.

Title V permits are generally issued to the owner or operator of a larger facility that has emissions over certain air pollution emission thresholds. These permits are for the entire facility and include terms and conditions for virtually all of the air pollution emitting activities at the facility and surrounding site.



Where applicable, individual source permitting for the air pollution emitting unit is required before the construction work begins. Such construction work includes excavating, blasting, removing rock and soil; and installing footings, foundations, retaining walls, or permanent storage structures.

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Frequently Asked Questions About Air Permits



- Who needs to get an air permit?
- What's in an air permit?
- What are the costs involved in obtaining a permit?
- How long does it take to get a permit?
- What permits need to be renewed and when?
- What is EPA's role?
- What happens when regulations change?
- How can the public participate?
- What happens if a source violates its permit?

Content Last Updated June 9, 2010

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Website Enhancements

The Low Hanging Fruit

Re-design Of Air Web-pages

- Report success rates achieving permit timeframes
- Review, assess, and benchmark other states
- Bring necessary tools to the surface for easy access
- Permitting 101 discussion to emphasize importance of pre-application meetings and the significance of non-attainment on air permitting
- Manage applicants expectations by publishing permit timeframes
- Make guidance documents more visible
- Submit permitting questions on-line





Website Enhancements

The Mid-Hanging Fruit

Title V/NSR Catalog

- Evaluating including all NSR permits and evaluations, registrations, and Title V Technical Support Documents for Title V Universe

Connecticut RACT/BACT/LAER Clearinghouse

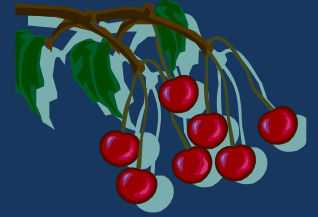
- Evaluating what can be done short-term, long-term

Explore Permit Wizard

- Evaluating to assess value added and need compared to other needs
- Wide array of possibilities



Website Enhancements The Cherry-Picker Fruit



Permit Tracking

- UPS model

Permit Wizard

- OIM assessment of costs and resources to implement

Remote Access to EMIT to conduct Radius Searches

- Short-term - allow public login on computer in file room

Complete NSR Permit Files On-line





Program Evaluations

2010 Priorities

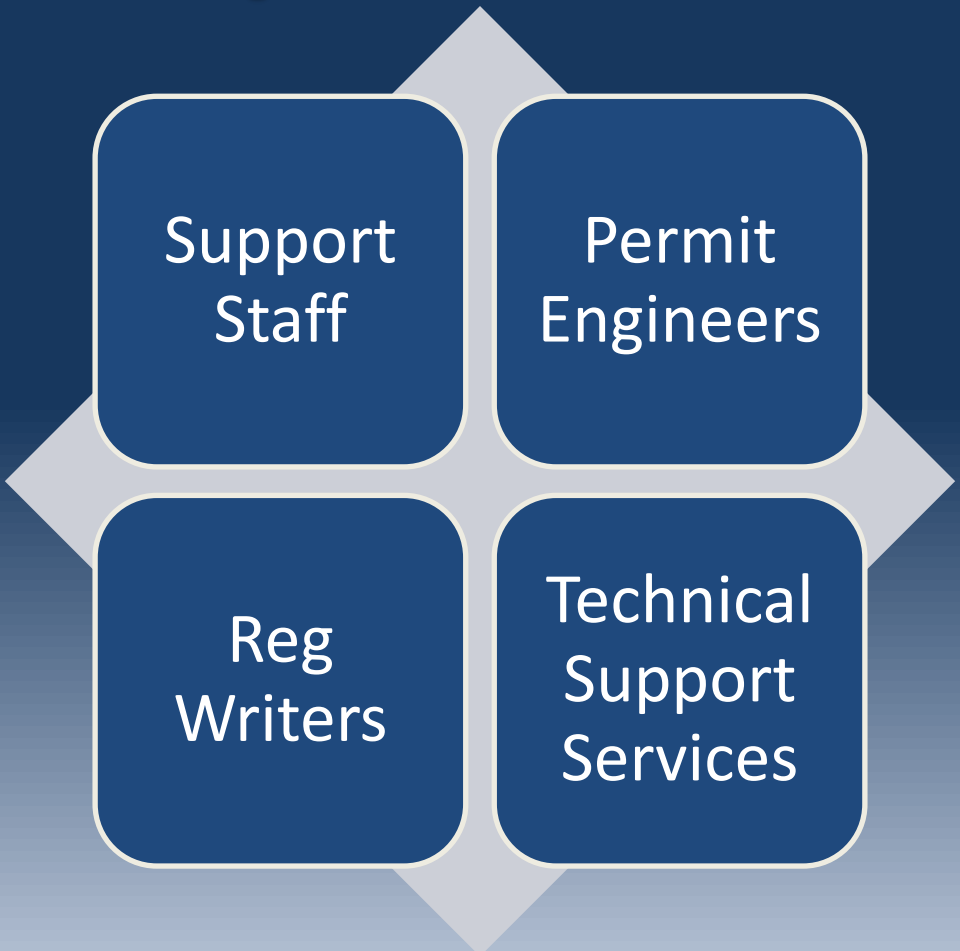
- Repeal Indirect Source Program
- Eliminate State Role in Noise Program
- Implementation of GHG Tailoring Rule

Longer Term

- General Permit for Collateral Conditions
 - Address small units at major sources, i.e. emergency engines at college campuses
 - Create enforceable caps
- Emissions Offsets for NSR
 - DECD purchase
 - 2-permit CP/OP process option for Non-Attainment NSR permit applications
- Alternative compliance mechanism for Section 29 MASC



Obtain and Maintain Adequate Staffing



Scope of commitment must be defined before we can quantify.



Next Steps...

- Obtain feedback on Web Page enhancements
- Construct new Air Web Pages
- Decide on strategies to implement
- Develop implementation work plan
- Conduct resource allocation review and assess if additional resources are needed
- Share air program experience and coordinate efforts within DEP
- Look for additional LEAN Opportunities

