

Improved Title V Inspection Process - What Has Changed?

Robert Girard, Assistant Director
Engineering & Enforcement Division
Bureau of Air Management
Connecticut Department of Environmental Protection
robert.girard@ct.gov

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

Log #: [] - []
e-file Name: []
Engineer's Name: []
Inspector #: []
T/P/C/S: []/[]/[]/[]

STATE OF CONNECTICUT
DEPARTMENT OF
ENVIRONMENTAL PROTECTION
TITLE V PREMISE EVALUATION
REPORT

TV issued? Yes No
Title V #: [] - [] - TV
Date of Issuance: []/[]/[]
AFS #: []

FACILITY INFORMATION

Company Location: [] On Site Contact: [] Mailing Address: []
Name [] Name []
Address [] E-Mail: [] Address []
Town, State ZIP [] Phone: ([]) [] - [] ext.: [] Town, State ZIP []
Corrections: [] Corrections: []

Inspection Date(s): []/[]/[] Start Time: []: [] End Time: []: [] Travel Time: []
[]: [] []: [] []: []
[] [] []
[] [] []
Total Travel Time: [] Total Inspection Time: []
Report Time: []

INSPECTION DATE
CONFIRMATION

Notification made: []/[]/[]
Confirmation received date: []/[]/[]

WEATHER CONDITIONS
AT THE TIME OF:

Walk Through Other []
Date: []/[]/[]
Wind (direction & speed): []
Temperature: []°F
Conditions (i.e. sunny, cloudy, etc.): []

OBJECTIVE – FULL AIR COMPLIANCE EVALUATION

To fully assess facility compliance with all applicable state and federal air requirements.

Section 22a-174-2 Registration(s) #(s): [] Section(s) 22a-174-3/3a Permit(s) #(s): []
New Source: Yes No Major Modification: Yes No
Emission Statements: Yes No State Order(s): Yes No
NOx Order(s) #(s): [] Section 20(s) Exemption Order(s) #(s): []
VOC Order(s) #(s): [] Other Order(s) #(s): []
TVCC: Yes No FCE PCE
There is control equipment: Yes No
Has there been a change in ownership/name since issuance of any permits, orders, or registrations? Yes No

ENFORCEMENT RECOMMENDATION

Notice of Violation Issued: Yes No NOV #(s): []
Violations of these programs: NSPS NESHAP MACT
State and/or Federal Regulatory Citation(s): []

Company Name [REDACTED]

Log #

Engineer & Insp. # [REDACTED]

Emissions:

Primary Pollutant	Actual	Potential	Units	Spec. Conditions/Limits
Particulate Matter	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Oxides of Nitrogen	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
VOCs	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
SO _x	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
HAPs	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
CO	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Other	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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): [REDACTED]

40 CFR Part 61 (NESHAP) Subpart(s): [REDACTED]

40 CFR Part 63 (MACT) Subpart(s): [REDACTED]

40 CFR Part [REDACTED] Subpart(s): [REDACTED]

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 [REDACTED]

FACILITY DESCRIPTION:

Additional information provided in the Attachment lettered C Other

FACILITY WALK THROUGH:

Additional information provided in the Attachment lettered A C D Other

RECORDS ASSESSMENT:

Additional information provided in the Attachment lettered A C D Other

REVIEW OF PREMISE-WIDE REQUIREMENTS:

Additional information provided in the Attachment lettered A C D Other

AIR PROGRAM COMPLIANCE HISTORY:

Additional information provided in the Attachment lettered B Other

CHANGES, NEW EQUIPMENT, ANTICIPATED REVISIONS & CHANGES IN OWNERSHIP:

Additional information provided in the Attachment lettered A C D E Other

STATE ONLY REQUIREMENTS:

Additional information provided in the Attachment lettered A C E Other

VIOLATIONS NOTED:

Additional information provided in the Attachment lettered A C D E Other

CONCLUSIONS & RECOMMENDATIONS:

Engineer Signature: _____ Date:

Supervisor Approval: _____ Date:

Sample
Checklist



Sample
MACT
Checklist



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