

Bernie Evans, Ric Pirolli (Champion), Bob Hannon, Lidia Howard, Lou Corsino (Team Leader), Debola Bamgbose, Valerie Galo, Lakiesha Christopher, Jim Grillo, April Desclos, Gary Rose (Sponsor)

#### NEW SOURCE REVIEW AIR PERMITTING PROCESS LEAN IX – JANUARY 24-28, 2011

## LEAN AT DEP

 Lean is an approach to process improvement and provides a set of methods that seek to eliminate non-value added activities or waste in a process

Dedicated week long Lean events are key to making rapid, breakthrough improvements to a process while at the same time empowering the participants and giving them ownership in the process

# **TEAM CHARTER**

- Due to the complexity of the reviews, the Major New Source Review Permitting Process currently takes over 1 year to process.
- The timeframes included in Public Act 10-158 are a challenge to meet for the most complicated cases
  - + 60 Days to Notice of Insufficiency or Sufficiency
  - + 180 Days to Tentative Determination from date application becomes Sufficient

## PROJECT SCOPE

- Utilize Value Stream Mapping to identify opportunities for improvement in New Source Review permitting process
- Develop new standards for technical sufficiency reviews
- Improve quality of applicant's BACT analysis

### LETS GET STARTED

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## **CURRENT STATE**



#### **CURRENT STATE - VALUE STREAM MAPPING**

Type of Step	Current # of Steps	
Value added = Green	31	
No Value Added = Red	20	
No Value Added but Necessary = Yellow	18	
Waiting = Purple	6+	
Transport = Blue	50	
Total	125+	



### **ANALYSIS OF CURRENT STATE**

× Opportunities for Improvement

- + Technically incomplete applications cause delays during review process
- + Excessive transportation of application
- + Multiple review loops
- + Lack of proper forms and guidance for the most difficult technical review processes, BACT, PSD, Non-Attainment, etc.

## **GUESTS – SUPERVISORS**



Kiernan Wholean and Susan Amarello

- Explained differences in app review during case assignment
- Re-Works from them are 90% minor, 10% technical
- Consistency between permitting groups
- Issues with consistent formatting with different printers

## WOW! MOMENTS

- × Application Preparation & Outreach Workshops
- Strongly Suggest Application Review Meetings for Major Sources
- × Improved Sufficiency Review
- × Electronic Workflow
- × Re-delegation of Signatory Requirements
- × Create Permitting Manual for Permit Engineers
- Create CT BACT database & other tools

# **GUESTS – EPA**



Ida McDonnell and Donald Dahl

 Suggested Preapplication meeting

Outreach Workshops
 were good idea

Draft permits to
 Applicant and
 Enforcement prior to TD

× Good BACT reviews

### **GUESTS – APPLICANTS & CONSULTANTS**



Mike Anderson, Mike Holzman, Chris Santucci, Tanja Ashlin, Mark Sussman

- Excited about Workshop idea
- Consistency between permitting workgroups
- Appreciate opportunity to see draft before TD
- × NOx Offsets Availability, CT Bank of Offsets
- × More Tools from DEP to aid in app preparation

## MOTHER NATURE INTERVENES....AGAIN



### LET'S GET IT DONE!

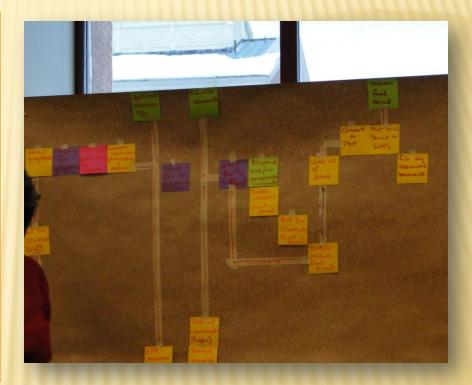
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## FUTURE STATE



## FUTURE STATE – VALUE STREAM MAPPING

Type of Step	Current # of Steps	Future # of Steps			
Value added = Green	31	10			
No Value Added = Red	20	1			
No Value Added but Necessary = Yellow	18	23			
Waiting = Purple	6+	4			
Transport = Blue	50	1			
Total	125+	39			
% REDUCTION IN THE NUMBER OF TOTAL STEPS = 69%					



### **PROJECT IMPLEMENTATION PLAN**

TASK/ACTIVITY	TASK OV/VED(S)	PARTICIPANTS			I ei
Task 1. Title Create Pre-Application Meeting SOP					
Create Pre-Application Meeting SOF Create standard agenda for Pre App meetings Change forms/instructions to allow submittal of applications on	TASK/ACTIVITY		TASK OWNER(S)	PARTICIPANTS	Weel
	Task 1. Title				
Research scanning capability for paper application submitted Create SOP for Supervisor Case Assignments (focus on case		Ip video (Nebraska) Dutreach Workshops (BACT, PSD, etc?) ions for pre-application meeting			+
oads and case status so that workflow is not batch, create flow)		pureaus are doing for electronic submittals			+
Research Electronic Signature methods allowed by state (for both neoming and outgoing)	[LDs or web based] Change delegation for NOI and NOS to Supervisor or Engineer Research if emails are allowed as official notification of				+
Create SOP for NOI/NOS process (i.e. only allow one 30 day period for response, if no response then reject app)	Insufficiency or Sufficiency (Does it stop the clock?) Create Technical Sufficiency Review Checklist				
Ensure email addresses are contained on all applications and confirm during tech suff review		equirements in Tech Review Checklist			
Create Non-Attainment or PSD forms to ensure applicant submits all required info.	Create new Insufficiency Letter (to go along with Tech Review Checkist)				
Revise forms as necessary to ensure complete info submitted indicate permit type, ability to expand entry boxes, etc.)	Create CT BACT Database Research Pros and Cons of separate CP and OP for major				
Consistency between permitting groups - SOP for permitting Create SOP for communication - monthly updates? Supervisor		POP requirements that EPA may require			-
updates? Training of staff for proper formatting of evals, forms, etc.		uirements in permit?, etc.) fts (to applicant and enforcement group) -			
		st for more info letter for tech review, SOP			
	Research training for our air admin staff)	preation of Invoices (either CPPU staff or			
	Research pros and co application submittal o	ns of timing of modeling submittal (at or during tech review)			
		CT Nox credit database/availability/creation heighboring states to allow quick approval			
		of new permit signature - Director (or BC,			_
		of rejection letter (Supervisor signs,			—
	notification to AD) Research document to workflow (draft, final)	emplate to include watermark for electronic			+

## **IMPLEMENTATION PLAN TASKS**



- Create Application Review Meeting SOP w/std agenda
- Create Sufficiency Review Checklist
- Change Signatory Delegation of Letters/Permits
- Publish More Information online Regarding NOx Credits

## **IMPLEMENTATION PLAN TASKS**



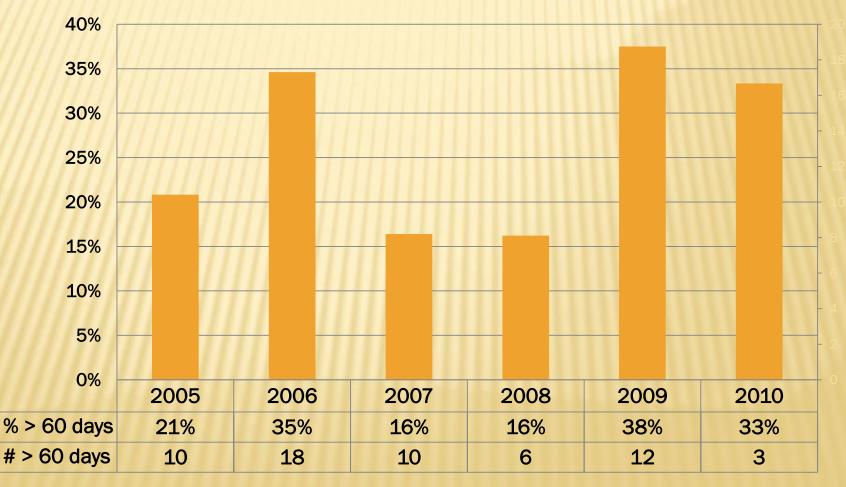
- Research and Develop Methods for Electronic Application Submittal (on CD initially)
- x Develop Electronic Workflow SOP
- Create SOP for Supervisor Case Assignments
- Create and Populate CT BACT Database

# **IMPLEMENTATION PLAN TASKS**

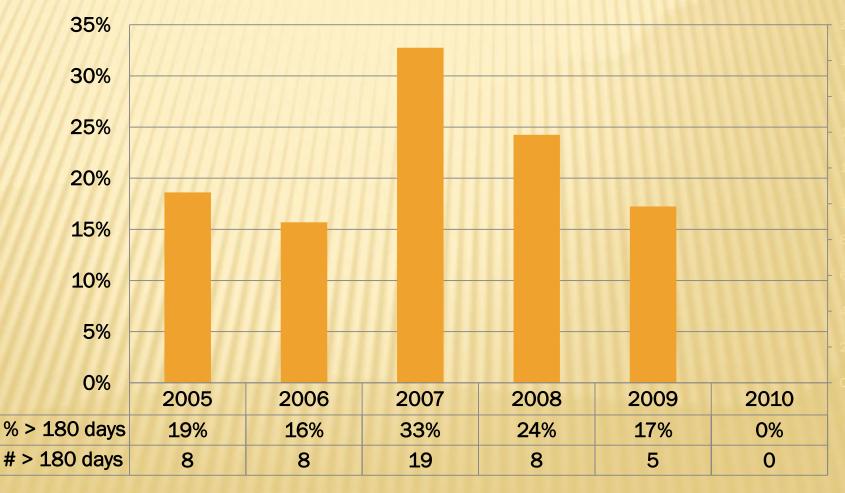


- Update or Create Forms where needed (PSD, Non-Attainment)
- Create a Permit Engineer SOP (Permit Manual)
- Develop Outreach Workshops/Videos

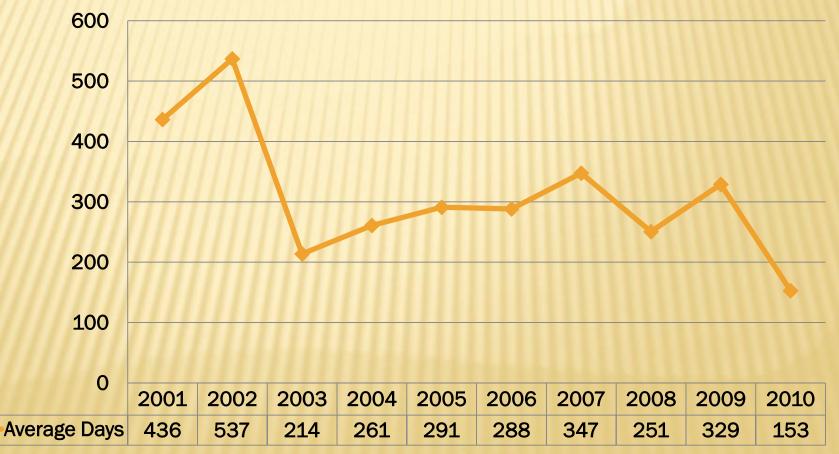
100% of NSR apps deemed sufficient within 60 days from date of receipt
 + 2005-2010 - 59 New NSR apps (25%) did not meet this time frame



- × 100% of NSR apps at TD within 180 days after becoming sufficient
  - + 2005-2010 48 apps (21%) did not meet this time frame



- × Overall processing time reduced for New NSR apps
  - + 2005-2010 276 days avg processing time with 52 apps (24%) greater than 365 days



- 100% of Major Sources attend pre-application meeting shortly before application submittal
  - + Currently not required
- Success rate of apps that go through an application review meeting versus those who don't
- × Sign-off chain time reduction
  - + Current estimated average 27 Days Total
    - × Sufficiency 5 days (3 signatures)
    - × Tentative Determination 16 days (4 signatures)
    - × Final Permit 6 days (5 or 6 signatures)

## WE HAVE ONLY JUST BEGUN



- × What did we learn?
  - + Lots of No-Value Added Steps in Current State
  - + Lean Process enabled us to see the inefficiencies in our current process

#### × Summary

- + Work closer with applicant earlier in process
- + Switch from paper to electronic workflow where we can
- Implement what is currently achievable in order to get to ideal state

## **QUESTIONS OR COMMENTS?**

× Questions or Comments can be directed to:

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