

Connecticut Department of Energy and Environmental Protection











2016 Air Enforcement Statistics

3/9/2017 Robert W. Girard SIPRAC



Connecticut Department of Energy and Environmental Protection

Monthly Enforcement Progress Report

- Clearly identifies program goals and commitments
- Tracks progress in achieving goals and meeting commitments
- Visual indicators quickly convey program status
- Assists with planning and scheduling assignments
- Provides enforcement stats for reporting purposes



Inspection Targets and Results

| Inspection Category | Month of September | FFY 2016 Totals | Programs Goals | Percent of Goal Met |
|--------------------------------|-----------------------|--------------------|--|------------------------|
| Complaint | 22 | 289 | Insp within 2 wks of receipt | 224/289 = 77.5% |
| OWF Complaint | 0 | 6 | Insp within 2 wks of receipt | 1/6 = 16.7% |
| Municipal Open Burning Permits | 1 | 27 | Insp within 3 wks of receipt | 26/27 = 96.3% |
| Title V Plant Evaluation | 0 | 34 | 34 insp Apr 1 – Sept 1 (6.8 insp/month prorated) | 34/34 = 100% |
| GPLPE Plant Evaluation | 2 | 42 | 40 insp Oct 1 - Sept 1 (~3.6 insp/month prorated) | 40/40 = 100% |
| Minor Source Plant Evaluation | 10 | 27 | 24 insp by Sept 30 (2 insp/month prorated) | 27/24 = 100% |
| Requested Inspection | 8 | 116 | | N/A |
| Sub -total | 43 | 541 | | |

| Metric | Achieving Program Goal | Within 10% of Program Goal | Less than 90% of Program Goal |
|------------|------------------------|----------------------------|-------------------------------|
| Color Code | | | |



Compliance Report Reviews

| Report Category | Current Month | Reporting-YTD | Yearly Goals | Prorated Goal Completion* |
|--------------------|-------------------------------------|---------------------------------------|-----------------|------------------------------|
| Title V | Monitoring Reports: 16 | Monitoring Reports: 82 | 142 | 71 |
| | Compliance Certifications: 9 | Compliance Certifications: 71 | 71 | 71 |
| EPA cursory review | Within 60 days of receipt: 0 | Within 60 days of receipt: 71 | 71 | 100% |
| GPLPE | Annual Compliance Certifications: 1 | Annual Compliance Certifications: 206 | 214 | 100% |

^{*} Number required to achieve 100% prorated goal

Report reviews are tracked by calendar year. GPLPE reports are received, logged in March, and report review goals are based upon 90 days from receipt. Compliance Certification reports for TV are received and logged in March. (The January dates are being phased out, as permits are modified.) TV reports review goals are based upon 5-month period between May and September. EPA cursory review goal is 60 days from receipt.

| Task | Current Month | Federal Fiscal Year (YTD) | Average Review Time (days) | Performance Goals | No. of Reports Under Review | Color Code |
|--------------------|---------------|------------------------------|-------------------------------|----------------------|--------------------------------|---------------|
| CEM | | | | | _ | |
| Summary Reports | 22 | 118 | 59 | <90 days | 2 | |

| | Metric | Achieving Program Goal | Within 10% of Program Goal | Less than 90% of Program Goal |
|----|----------|------------------------|----------------------------|-------------------------------|
| Со | lor Code | | | |



Protocols/Reports

Protocols/ Reports

| Task | Current Month | Federal Fiscal Year (YTD) | Average Review Time (days) | Performance Goal | No. of Protocols/ Reports Under Review (Backlog) | Color Code |
|--------------------------------|------------------|------------------------------|-------------------------------|---------------------|--|---------------|
| Stack Test Protocols | 1 | 89 | 40 | <30 days | 11 | |
| Stack Test Reports | 26 | 89 | 191 | <60 days | 76 | |
| CEM (RATA) Test Protocols | 0 | 51 | 41 | <30 days | 1 | |
| CEM (RATA) Test Reports | 7 | 31 | 196 | <60 days | 51 | |
| CEM QA Reports ¹ | 10 | 36 | 100 | <90 days | 49 | |

¹Includes CGAs and opacity audits.

| Metric | Achieving Program Goal | Within 10% of Program Goal | Less than 90% of Program Goal |
|------------|------------------------|----------------------------|-------------------------------|
| Color Code | | | |



Test Observations

Test Observations

| Task | Current Month | Federal Fiscal Year (YTD) | Percent of Tests Audited (Current Month) | Percent of Tests Audited (YTD) | Performance Goal | Color Code |
|--|------------------|------------------------------|--|--------------------------------------|---------------------|---------------|
| Stack Tests Conducted (on equipment basis) | 14 | 145 | 78% | 82% | TBD | N/A |
| RATA Conducted (on equipment basis) | 2 | 44 | 100% | 88% | TBD | N/A |
| Stack Tests Conducted (on facility basis) | 6 | 89 | 100% | 84% | 100% | |
| RATA Conducted (on facility basis) | 1 | 23 | 100% | 88% | 100% | |
| Staff Days in the Field | 8 | 144 | | | | |

Note: Does not include quarterly Continuous Emissions Monitoring audits (i.e., cylinder gas audits and opacity audits).

| Achieving Program Goal | Within 10% of Program Goal | Less than 90% of Program Goal |
|------------------------|----------------------------|-------------------------------|
| | | |



Informal Enforcement Actions

Notices of Violation Issued:

| Current Month | FF-YTD | 5 yr average | Avg. days for issuance | Program Goal: 90% of NVs issued within 90 days from discovery |
|---------------|--------|--------------|------------------------|---|
| 13 | 150 | 161 | 58 | 79 % |

Notices of Violation Closed:

| Current Month | FF-YTD | Avg. Days Since Issuance | Program Goal: 90% of NVs closed within 365 days from issuance |
|---------------|--------|--------------------------|---|
| 9 | 74 | 283 | 62% |

| Metric | Achieving Program Goal | Within 10% of Program Goal | Less than 90% of Program Goal |
|------------|------------------------|----------------------------|-------------------------------|
| Color Code | | | |



Formal Enforcement Actions

Formal Enforcement Actions Taken:

| Action | Current Month | FF-YTD | Avg. # of days from discovery | Indicated days from discovery target | Performance Goal: 90% of Actions issued within indicated days from discovery |
|--------------------|---------------|--------|----------------------------------|--|--|
| Consent Orders | 1 | 29 | 198 | 300 | 92% |
| Unilateral Orders | 0 | 2 | 300 | 180 | 50% |
| A.G. Referrals | 0 | 1 | 14 | 210 | 100% |
| Criminal Referrals | 0 | 0 | - | - | - |
| VOC RACT Orders | 0 | 2 | - | - | - |
| EPA Referrals | 0 | 0 | - | - | - |
| Trading Orders | 0 | 0 | - | - | - |

Formal Actions Closed (CO, AO, AG, CR, EPA):

| Current Month | FF-YTD |
|---------------|--------|
| 1 | 16 |

| Metric | Achieving Program Goal | Within 10% of Program Goal | Less than 90% of Program Goal |
|------------|------------------------|----------------------------|-------------------------------|
| Color Code | | | |

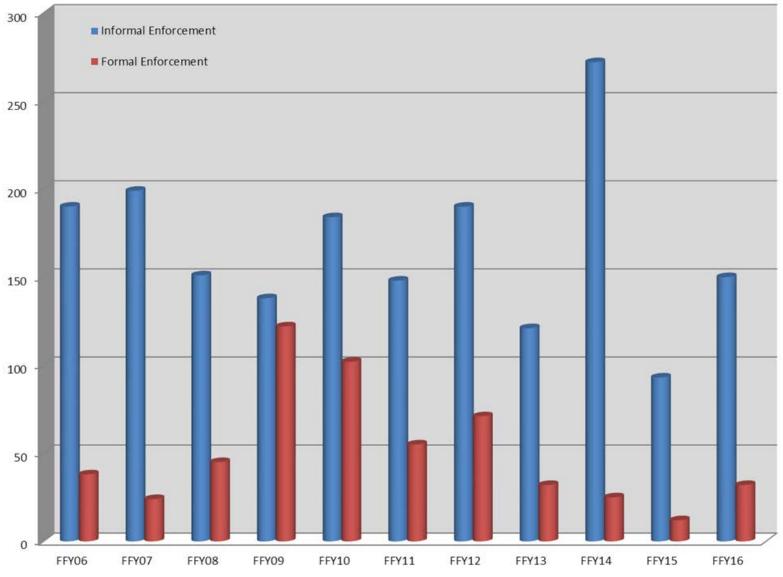


Most Commonly Identified Violations

| Number of NOVs Issued | Туре |
|---------------------------------|---|
| 30 | Failure to decommission Stage II vapor recovery system and/or failure to conduct Stage I test |
| 14 | Failure to submit GPLPE reports |
| 10 | Outdoor Wood-Burning Furnaces |
| 8 | Odors |
| 5 | Idling |
| Number of Formal Actions Issued | Туре |
| 20 | Consent Orders issued to gasoline dispensing facilities |



Enforcement Trends





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Questions?

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