



Connecticut Department of Energy and Environmental Protection



Field Enforcement Inspection Changes

Due to Covid-19 pandemic, the subsequent restrictions on entering buildings, the need to maintain social distancing and PPE requirements for in person meetings, the Bureau has decided to conduct our Title V inspections this year virtually. This is a dramatic change from the way we have conducted Title V inspections since the program began back in late 1990's.

This virtual inspection process will likely continue into some part of 2021.



Virtual Inspection Process (2020 – 2021?)

Preparing for the Inspection

- Review in-house documents such as past inspection reports, compliance and monitoring reports, emissions, and stack test data to identify areas to focus the inspection, questions, and records requests on.
- From this review, a preliminary list of the questions and documents needed to complete the compliance evaluation on will be developed.
- An initial email/phone call to make introductions, go through the new inspection process, outline our expectations, and schedule a the virtual inspection/meeting will be made.

The Virtual Inspection

- During the virtual meeting, field enforcement staff will ask questions, review processes, and discuss how data/records/emissions are made and calculated. The goal is to review all applicable requirements in order to make a compliance determination.
- If time allows, some actual records can be reviewed via screen sharing.
- At the end of the meeting, staff will provide an overview of remaining questions and what records we are going to request. Records considered Confidential Business Information (CBI) should be discussed with staff.



Virtual Inspection Process (2020 – 2021?)

Follow up

- Following the call, a records request will be sent by email that will include a detailed list of records we would like to see to complete our compliance evaluation.
- Once the records are received, they will be reviewed to complete the compliance determination. If needed, an additional call can be made to answer any new questions prior to the final call.

Final Steps

- A final call to discuss any remaining questions and the inspection findings will be made.
- Depending on the type of source, we may conduct an inspection if it can be done with limited personal interaction.
- A report including the supporting documentation will be generated as it always has.



Virtual Inspection Questions?

Before we move on to the PIQ program change, are there any questions on the Virtual Inspection Process?



Pre-Inspection Questionnaire (PIQ)

Due to the Covid-19 pandemic, we have reviewed some of our processes and programs to see if there are efficiencies we can utilize this year and going forward into the future. One of the processes we reviewed was the PIQ program and the benefits it provides the Bureau. After our review, we have decided we are no longer going to request Title V sources complete a PIQ prior to our bi-annual inspections.

We ask that you keep an up to date list of the sources at your facility that is available for review when we conduct the inspection.

Sources operating under the current GPLPE permit/registration program, the upcoming GPLPE regulation and true minor sources, will still be required to complete and submit a PIQ before we conduct an inspection.



Questions?

Mark Potash

Supervising Air Pollution Control Engineer

mark.potash@ct.gov

860-424-3547

ct.gov/deep



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