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CBIA Energy &
Environment Council

CBIA 2019 ENERGY & ENVIRONMENT CONFERENCE

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Connecticut Department of
Energy and Environmental Protection



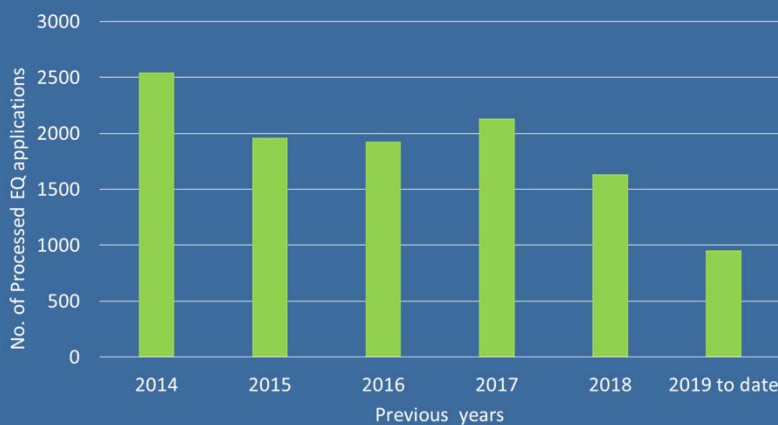
Environmental Quality Permitting – Striving for Predictability, Efficiency & Transparency

June 13, 2019
Deputy Commissioner Betsey Wingfield
CBIA 2019 Energy & Environmental Conference



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We Process Lots of Permits...



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Common Permitting Questions

- What permits do I need to do a specific activity?
- How do I apply?
- What are the standards that will apply to my permit?
- When will I get my permit?
- Will I have to pay a fee?
- What is the status of my permit?



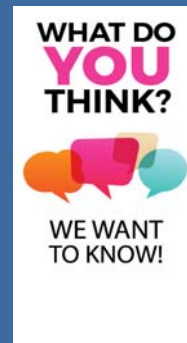
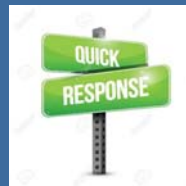
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Pre-application Assistance Leads to Smoother Permitting



In accordance with Public Act 18-146, enhance coordination and feedback on pre-application assistance and permit decisions.

Establish prompt 48 hour response to permit status inquiries and strive to make permit timeframes for issuance more predictable and transparent



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Make Permitting Timeframes More Transparent

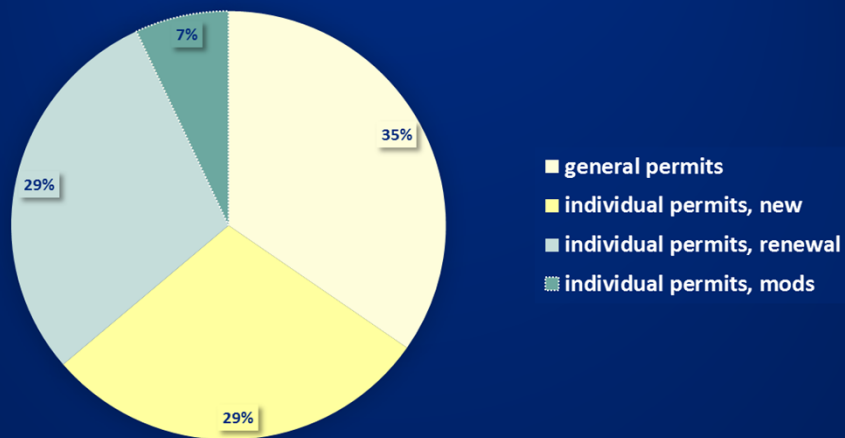


No to Narrow Review	Limited Review	Comprehensive Review
<ul style="list-style-type: none"> General permits with no filing and registration only Permits by Rule 	<ul style="list-style-type: none"> General permits with registration and approval; Permits such as certificate of permission, aquatic pesticides 	<ul style="list-style-type: none"> Individual permit applications;



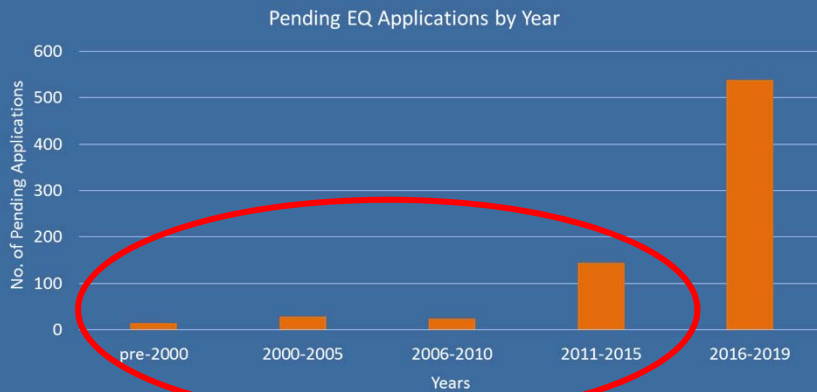
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Pending EQ Applications



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Reduce Legacy Pending Permits



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Looking to Utilize Other Tools

- Transition individual permit processes to general permits where appropriate
- Look at how we are handling renewals
- Move to permit by rule where appropriate
- Accelerate e-governance integration



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E-Governance



ezFile :



- Boating and Fishing Permits and Registrations;
- Radiation Registrations (DTX and RMI);
- Stormwater Registrations (Construction, Industrial and No Exposure); and
- Underground Storage Tank Notifications



Electronic Reporting will Reduce Reporting Burden, Improve Data Quality and Access to Data

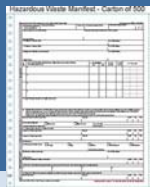


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E-Governance

<https://filings.deep.ct.gov/DEEPDocumentSearchPortal/>

Use the *new DEEP Document Online Search Portal* to view currently available agency documents.



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Suggestions and Comments Welcome

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DEEP Enforcement and Compliance Monitoring, Priorities and Trends

June 13, 2019
Nicole Lugli, Office Director
CBIA 2019 Energy & Environmental Conference



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Promote an Integrated approach to Enforcement and Compliance and Maximize Ability to Leverage Resources

Efforts to maximize protection of the environment
and public health and safety by

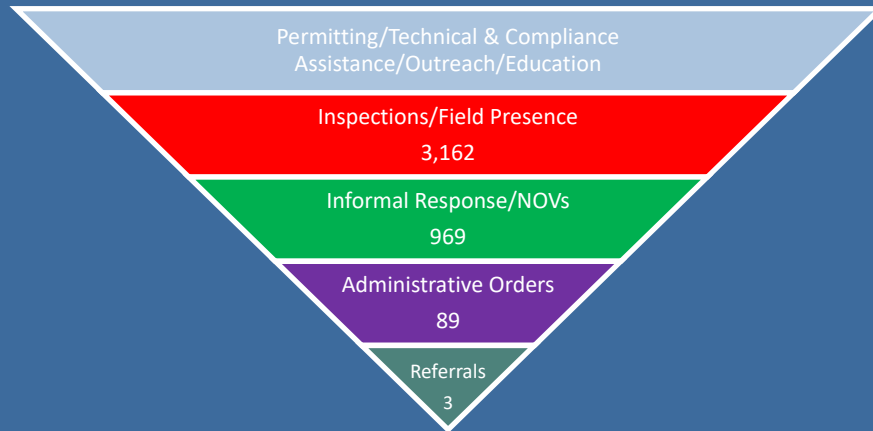
- using enforcement, permit and compliance assistance tools and resources in an integrated, efficient and balanced manner
- solving environmental problems identified as priorities
- effectively coordinating with EPA and Office of Attorney General



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Progressive Compliance Assurance

Preferred Path to Compliance- Five Year Average FY2014-2018



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DEEP's Enforcement Coordination Plan: a Cornerstone to Achieve Compliance

- Promotes coordination between media – air, water, materials management, land use
- Facilitates efficient use of resources
- Key areas for coordination:
 - Inspections – use of multi-media checklist;
 - Enforcement actions;
 - Corrective actions;
 - Staff training; and
 - with other agencies and EPA



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Beyond “Boots on the Ground” Inspections, Use of E-Reporting for Compliance Monitoring

- In addition to On-Site inspections, Air and Water staff conduct Off-Site compliance evaluations for areas such as:
 - Title V Compliance Certification, Semi-Annual Monitoring Reports and Prompt Deviation Reports
 - GPLPE Compliance Certifications and Annual Emission Summaries
 - NetDMR reporting – mandatory upon permit renewal and modification
 - Quarterly Non-Compliance Review (QNCR) for NPDES and SIUs (Pretreatment) Permittees

More than 1000 Reports evaluated by enforcement staff



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Transparency of Non-Compliance

- All formal Consent Orders and enforcement statistics are posted on DEEP’s website
- Annually post all Pretreatment Permittees (SIUs) in SNC on the Department’s website beginning July 1, 2017 (for 2016 calendar year)
- Subscribe to Air Compliance Assurance updates



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Electronic Compliance Training for Business and Municipalities



Connecticut Department of Energy and Environmental Protection

Questions?

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Connecticut Department of Energy and Environmental Protection

EPA New England Enforcement Priorities and Initiatives

James Chow, Acting Deputy Director
Enforcement and Compliance Assurance Division
EPA Region 1
June 13, 2019

EPA's National Compliance Initiatives (FY20-FY23)

- Focuses resources on the most serious areas of noncompliance through national program priorities, called National Compliance Initiatives (NCIs)
- Four-year cycle, but reevaluated periodically
- With each cycle, some NCIs remain while some return to core regional program work
- Work in partnership with our states in delegated program areas
- Goal of increased compliance through full range of compliance assurance tools

EPA's National Compliance Initiatives (FY20-FY23)

- Reducing Excess Emissions from Stationary Sources
- Reducing Hazardous Air Emissions from Hazardous Waste Facilities
- Reducing Risks of Accidental Releases at Industrial and Chemical Facilities
- Reducing Significant Noncompliance with National Pollutant Discharge Elimination System (NPDES) permits
- Stopping Aftermarket Defeat Devices for Vehicles and Engines
- Reducing Noncompliance with Drinking Water Standards at Community Water System

Region 1 Compliance Efforts - Lead Paint: Renovation, Repair and Painting (RRP) Rule



- Integrated approach to providing compliance assistance & enforcement of EPA's lead RRP Rule
- In partnership with state and local health agencies
- EPA Region 1 implements the RRP program in 4 NE states (CT, VT, ME, NH)



Region 1 Compliance Efforts - Lead Paint: Renovation, Repair and Painting Rule

Targeted Communities

- New Haven, CT (FY14)
- Nashua, NH (FY15)
- Lewiston-Auburn, ME (FY16)
- Portsmouth, NH & Portland, ME (FY18)
- Southern Vermont (FY19)

Results

- Over 1000 targeted mailings
- Over 200 field inspections
- Over 20 actions with fines assessed
- Publicized our results with press releases



Integrated Approach to Chemical Safety



Enforcement actions have ensured improvement at over 55 facilities to make them safer (FY13-FY18).



Integrated Approach to Chemical Safety

- Ammonia training for 300 participants on industry standards and safe handling practices (FY17-18).
- 15 emergency preparedness trainings/exercises and 13 compliance assistance workshops annually reaching more than 6,500 people.
- Continued activity in FY19.

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AMMONIA SAFETY & TRAINING INSTITUTE
ASTI IS A 501(c)(3) NON-PROFIT

OSHA

ALFRED ME AMMONIA SAFETY DAY
THURSDAY MAY 11th, 2017

Free anhydrous ammonia training opportunity for public safety and industrial first responders, hazmat technicians, as well as emergency planners and regulators.

Topics

- Understanding hazards of ammonia
- C-A-N Report and initial response life safety management
- Risks and threats of industrial refrigeration hazards zones
- Objectives of industrial refrigeration emergency shutdown
- Rapid entry rescue, decontamination, and medical treatment
- Command and control expectations
- Containment options - use of the fan and tarp evolutions
- Command team awareness of potential catastrophic threat
- Dealing with downwind and downstream receptors
- Transition of command to the Hazmat Tech. Team
- Use of checklists, playbooks, and reference guides
- Review of a fire department SOP and teaming agreement

Note: Audience discussion is encouraged, questions can be submitted electronically with a text message from your cell phone during the training session

Who Should Attend?

- Ammonia End Users
- Governmental Inspectors and Planners
- Public Safety Emergency Responders
- Chemical Manufacturers & Suppliers

Thursday May 11th, 2017

On-Site Registration: 7:30 am
Class Hours: 8:00 AM to 4:30 PM
lunch during noon hour

York County Emergency Management
Agency 149 Jordan Springs Road
Alfred, ME

Course Cost: FREE [REGISTER](#)

Innovations in Compliance

- **Advanced monitoring**
 - At fenceline/discharge points (air and water) – private and government use
- **E-Reporting**
 - Electronic reporting of compliance info
- **Transparency**
 - More public information
- **Innovative Enforcement**
 - Data analytics to identify potential violations



Geospatial Measurement of Air Pollution (GMAP)



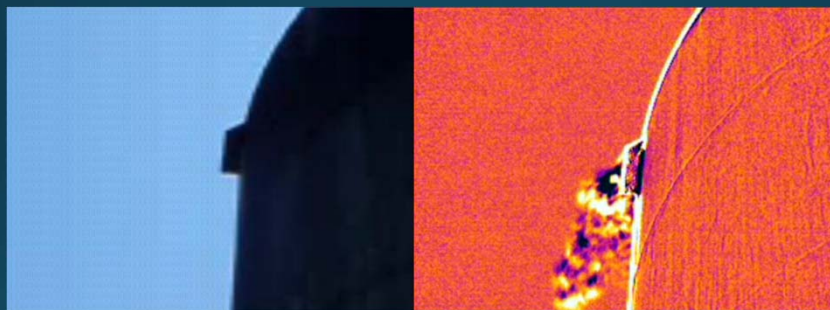
- Identify pollution in real time
- Fence line monitoring
- Remote sensing
- Facility feedback – Fix emission problems near real time
- Vehicle equipped with sensors for methane and BTEX



U.S. Environmental Protection Agency

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Digital Photo vs. Infrared Image



Regular digital photo of gasoline tank vent

FLIR® Gasfinder infrared photo of gasoline tank vent

Merging Air Pollution Sensors With Information Technology



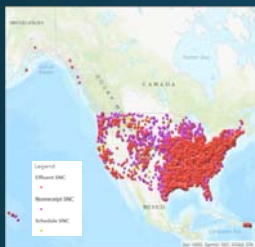
Citizen Science

- Citizen hand held sensors
- GPS
- Sensors – CO, NO₂, O₃, particulates
- Smartphone – App
- Data uploaded – help provide air quality info



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Mapping noncompliance



E-reporting and Data Mining



Using Smart Tools



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To report a potential violation:
<https://echo.epa.gov/report-environmental-violations>