

NSR Roundtable Review

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Overview

- ▶ We asked you to:
 - Identify portions of RCSA sections 22a-174-2a and 22a-174-3a that are not effective or are unclear.
 - Bring examples of regulatory approaches in other states that are preferable to Sections 22a-174-2a and -3a.
- ▶ We expected many ideas for improvement, including overall program changes and reformatting.
- ▶ Surprised by what we heard should be done:
 - Minor regulatory changes to Sections 22a-174-2a and -3a to delete obsolete requirements, make certain provisions clearer
 - Adjust procedures and forms, especially for minor modifications
 - Improve consistency of outcomes with shared information
 - Revise the permit-by-rule regulations (22a-174-3b and -3c)

Suggested Regulatory Changes

- Definition of incinerator in Section 1 is too broad given requirement to obtain a permit in Section 3a(a)(1)(G)
- Develop procedures for an “administrative modification”
- Obsolete (?):
 - Section 3a(a)(4) concerning permits issued under Section 3
 - Subsections (n) and (m) of Section 3a
 - Section 2a(a)(2)(A) reference to second quarter 1980 dollars
- Other minor changes were suggested
 - Improve clarity
 - Eliminate redundancy

Inconsistent Outcomes, Unexplained Phenomena and Requested Options

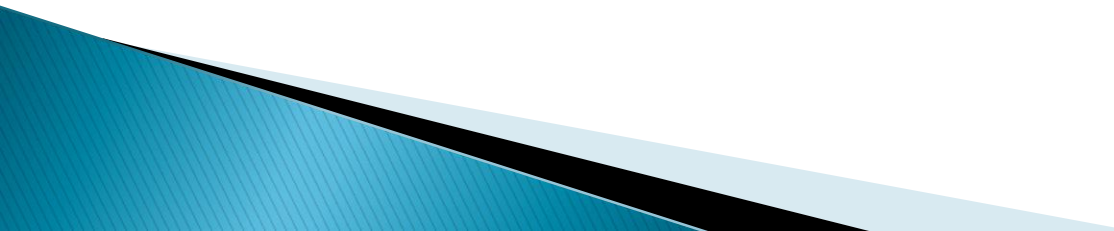
- Minor modifications
 - Different engineer, different information required
 - Unclear what is required in an application
 - Different fee amounts charged
 - Completeness and the 21-day waiting period
 - Permit revision for a fuel conversion
 - Additional requirements are often added to the permit beyond the scope of the revision
 - Allow applications with generic equipment and estimates of characteristics
 - Develop a turbine replacement policy
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Permits-by-Rule

- Add new equipment
 - Degreasers
 - Non-road engines
- Improve the existing requirements
 - Plasma spray booths and Section 3b(g)
 - Section 3b(c)(1)(D) is not clear about stack height with regard to neighboring buildings
 - Section 3c should allow for purchase records or use records to demonstrate compliance

Moving Forward

- ▶ Focus on actions that:
 - Improve consistency of outcomes;
 - Satisfy a federal mandate; or
 - Improve air quality.

 - ▶ Non-regulatory actions
 - Creating minor modification forms and instructions
 - NSR LEAN implementation
 - Communication of procedures internally and externally
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Moving Forward (continued)

- ▶ Likely regulatory actions
 - Evaluate revising Section 3a or Section 1 concerning incinerators for which a permit must be obtained
 - Hold an issue identification session on the permits-by-rule regulations (RCSA sections 22a-174-3b and -3c), likely after SIPRAC in April
 - Other “clean up” items will fit in with higher priority regulatory work (see the regulatory agenda presentation from January 11, 2011 SIPRAC meeting)

Questions / Comments

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