

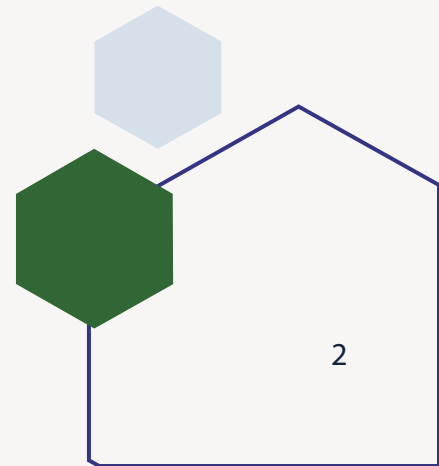
Tips for a Successful Inspection

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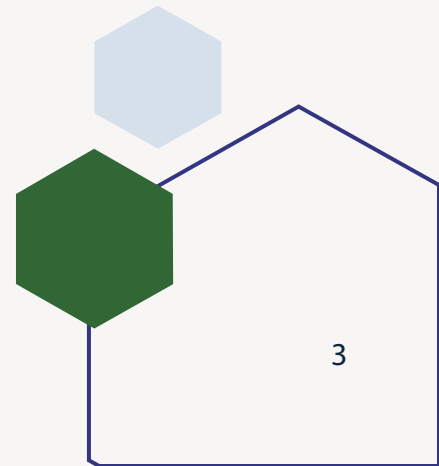
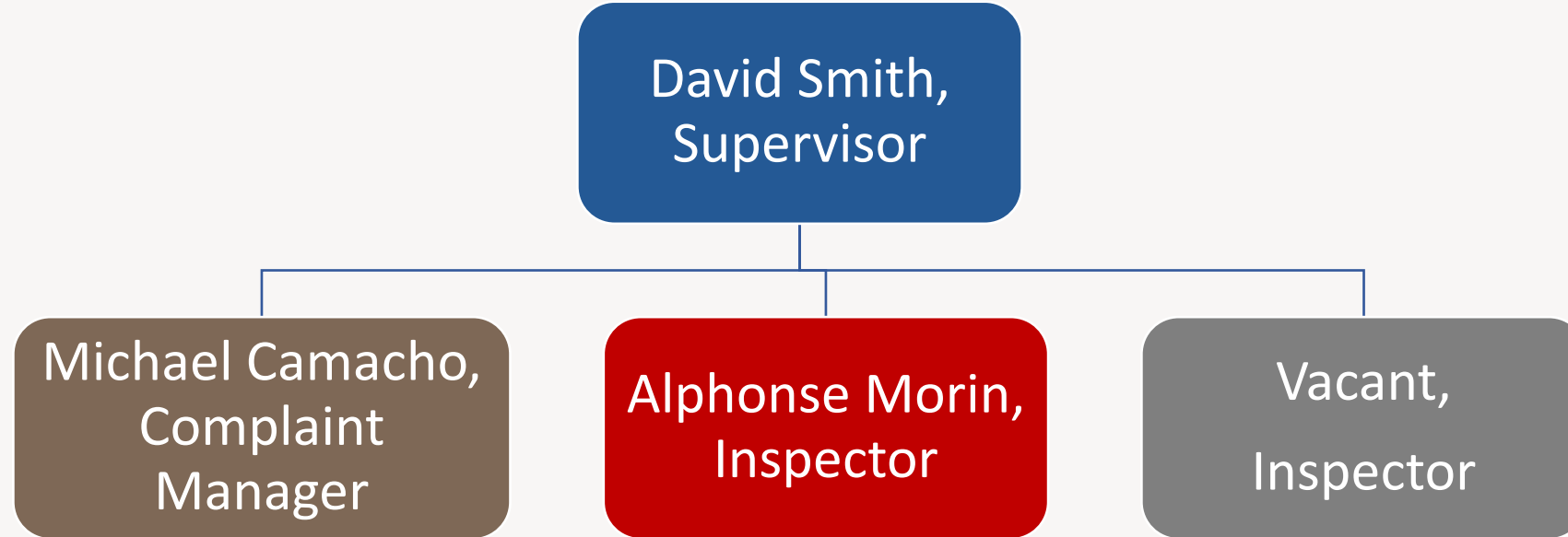


What is covered in the presentation:

- Overview of the Compliance Assessment Section
- What the Section does and why
- Reasons for inspection issues
- Common inspection findings
- What can your facility do

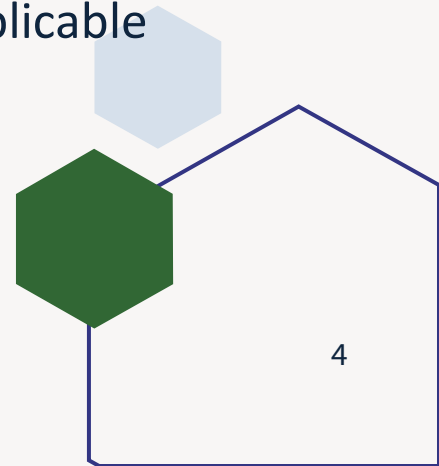


Compliance Assessment Section Overview



What we do and Why

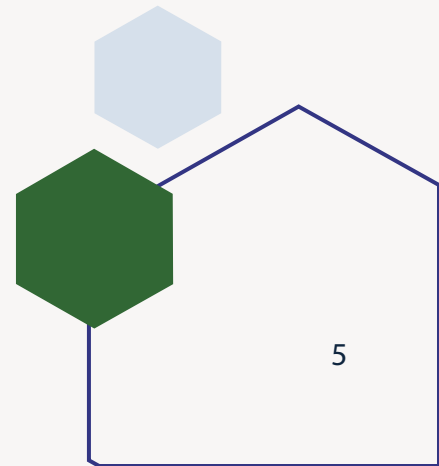
- The Compliance Assessment Section staff:
 - Conduct periodic inspections of permitted facilities.
 - Determine if a facility is complying with the requirements in the permit.
 - Provide assistance with determining if a facility needs a permit.
- Inspection purposes:
 1. Sustain a high quality of life for all citizens by protecting and restoring the environment and public health in New Hampshire.
 2. Create a level playing field where all facilities are required to comply with applicable requirements and permit conditions.
 3. Provide compliance assistance to the regulated community.



Common Inspection Challenges

Facilities face challenges due to:

- Lack of familiarity or understanding of the permit.
- Changeover in personnel.
- Lack of training for incoming personnel.
- Consolidation of responsibilities.



Common Inspection Findings



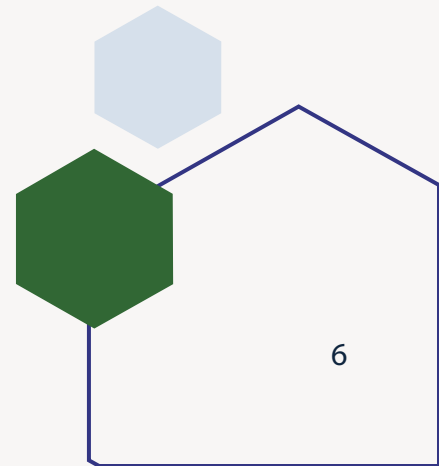
Env-A 1400
demonstration missing



Annual vs Rolling totals

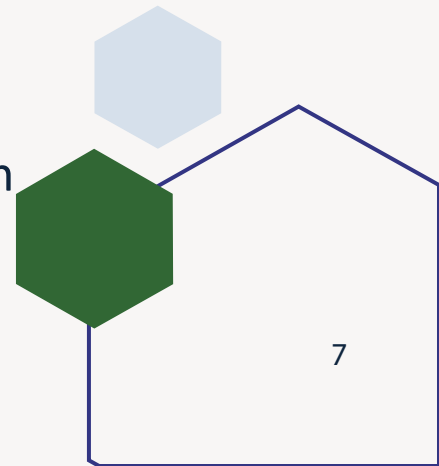


New equipment
installation



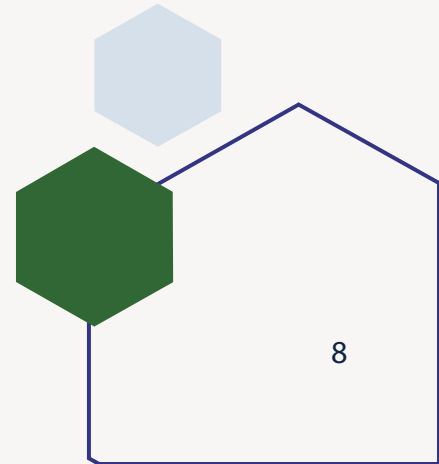
Env-A 1400 Demonstration

- NHDES periodically revises the list of regulated toxic air pollutants (RTAPs) and their respective ambient air limits (AALs) or classifications contained in Env-A 1400.
- If a facility needs to obtain or modify the permit as a result of a revision to the RTAP list,
 - The facility has 90 days from the date the rule is finalized to complete and file an application for that permit or permit modification.
- Bottom line:
 - The facility needs to determine its compliance status, using one of the methods in the rule (de minimis, in stack, adjusted in stack or modeling) well in advance of the 90-day window.



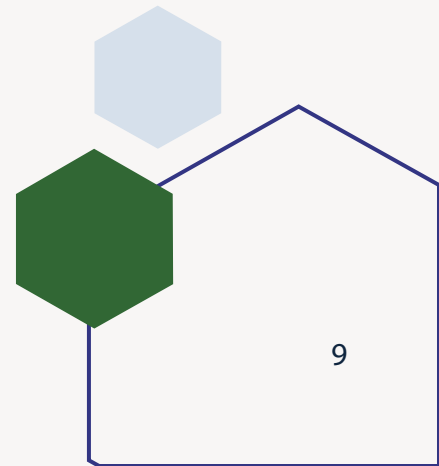
12-Month Rolling Totals

- Permits may contain a requirement to calculate emissions as a 12-month rolling total based on a calendar year.
- However, emission limit stated in tons per year, is actually tons per consecutive 12-month period.
- NHDES can provide compliance assistance to facilities regarding keeping this calculation available for review on a month-by-month basis.



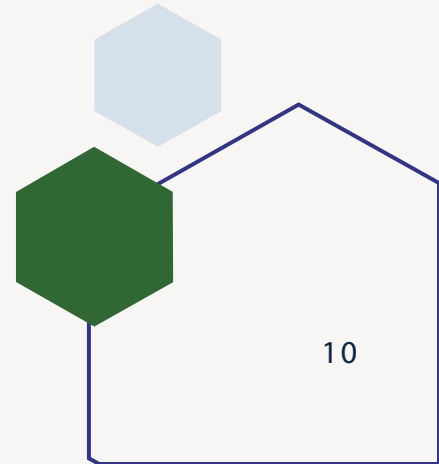
New Equipment Installation

- Situations where the installation or replacement of equipment at a facility, and the facility lacks an understanding of which equipment requires a permit or permit modification.
- Typically advise the facility rep, if there is any question whether the equipment exceeds permitting thresholds to contact NHDES.
- It's much easier for either the NHDES Compliance Assessment Section or Permitting Group to verify applicability.



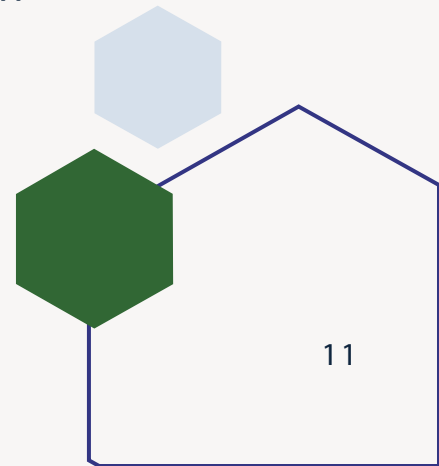
What Can a Facility Do?

- Call or email NHDES staff
 - Be proactive and reach out to staff with any questions or concerns.
 - New to the position? Call to review permitted requirements.
 - Installing a new device? Determine whether a permit is required prior to installation.
- Request to be added to a NHDES mailing list
 - The NHDES Newsletter contains information and updates, particularly relevant to Env-A 1400.
 - Rulemaking registry to be notified of changes to the rules when they happen.



What Can a Facility Do? (continued)

- Review your permit on a regular basis
 - Compliance starts with a thorough understanding of what you are required to do.
- Create a compliance schedule.
 - Ensure that requirements and timelines are communicated to and tracked by appropriate personnel.
- Conduct internal compliance evaluations.
 - Whenever possible, a dedicated EHS position should be available, or at minimum dedicated time and relevant training for non-EHS personnel.
- Establish a plan for retention of lessons learned during inspections.





Thank you

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