Maricopa County

Air Quality Department

PROCESS IMPROVEMENT INITIATIVE: TITLE V

The Title V Process Improvement meetings began on November 25, 2015 with internal stakeholders and followed on March 24th, 2014 with an external stakeholder meeting

Stakeholder involvement included internal stakeholders and environmental consultants representing a majority of the major sources permitted in Maricopa County.

Throughout the stakeholder meetings, there were 43 items identified as process improvement recommendations. The following pages include the stakeholder recommendations and staff's implementation efforts including percent completeness to date.

**Items highlighted blue indicate items discovered during an internal process improvement. All other items are from external stakeholder meetings.

Recommendation	Implementation	% Complete
Permitting Time Frames - Communication of permit application review status needs to be improved - Maintain timely permit application processing.	The comment was based on delayed permit actions in the past. Currently, permits are being processed in a timely manner.	100%
Interpretations and policy changes should be better documented to eliminate inconsistency. Provide any updated inspection forms or policies that are updated as a result of this process (also post to web) - Provide adequate documentation of changes in interpretation as applied to each specific permit.	Team has met and provided some examples of improvement in this area. This will always be an ongoing area for improvement and will look to stakeholders to weigh in at the next stakeholder meeting.	100%
Provide more opportunity to meet with inspection staff, permit writers and engineers regarding permits - Initiate recurring generic meetings with all Title V facilities. Initially on a semi-annual basis.	Follow up meeting has been scheduled.	100%
Forms for submitting records should be uniform - Gather additional clarification of issue. Conduct internal review of inspection procedure - revise forms where appropriate.	Convene internal team to review and develop consistent formats. Team actively reviewing options response due 5/27 Form created by Janet D is going to be implemented by all Inspector II's Standard 2 weeks to be used for record requests	100%
Inspections too complex. Operator should be able to have prepared everything needed to insure the inspection is completed at end of site visit - Conduct internal review of inspection procedure - evaluate to determine efficiencies.	With records requests it is not feasible that an inspection will be completed before an inspector leaves the facility. Other items in this Process Improvement will attempt to address concern that Inspections are too complex.	100%
Records requests too large and redundant with other submitted reports. - Need to develop better understanding of specific examples - meet and review to evaluate.	Normal practice is to submit a list of records and request submittal for review. If facility prefers – inspector can review records at site, if requested. Per Dept procedure, inspectors should not request records that have already been reported to the Dept unless circumstance warrants closer scrutiny.	100%

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Operator should have the ability to receive announced inspections (possibly if certain conditions met) - Conflicts with EPA enforcement policy - unannounced inspections are precluded. Review EPA policy to determine whether any flexibility exists.	This cannot be completed per EPA policy. However, if key onsite person is not available (e.g., vacation) inspection will be rescheduled unless reason for immediate inspection is present.	100%
Inspections need to be spaced out for operators running multiple locations so that one person/entity is not inspected multiple times in a close time frame - Review scheduling of inspections to determine if additional time between inspections is possible.	Inspections will be scheduled to provide a reasonable gap in time between inspections of multiple facilities operated by a single entity. Inspectors will devise a tentative schedule to accomplish this – 5/28/14 Inspections are currently spaced appropriately and staff will monitor prior to inspection to assure they remain timely spaced.	100%
EPA method requiring "air dried" samples does not coincide well with the current reporting submittal time frames - Review procedure and assess opportunities for flexibility in report submittal.	Take administrative action to extend test report submittal date Letter has been sent by Permitting pushing the 30 day requirement to 45 days – 6/27/14	100%
Have the ability to use internal audit reports or submittals of required reports - Conduct internal review of inspection procedure - evaluate to determine practicality of this approach.	Internal audit reports have limited use in terms of enforceability. However, on a case by case basis and with pre-approval, some internal audits may be acceptable. If use is determined acceptable, facility would need to waive any rights that preclude ability to validate or use in enforcement. Opportunity must also be present for independent verification of data.	100%
When office related record inspections are conducted, provide operator with an inspection report documenting that inspection - Consider segmentation of inspection components to address specific report elements - Discussion of completeness vs compliance determinations. What is this for?	For periodic reports submitted to the department for review, an email will be generated to acknowledge receipt and that the review has been concluded. When Title V reports are received records will be fully reviewed and a compliance determination made and the operator will be mailed inspection form	100%
Rotate the focus on inspections where certified equipment is involved to lessen the burden of report requirements - Gather additional clarification of issue. Conduct internal review of inspection procedure - evaluate to determine practicality of this approach.	Issue was discussed regarding CEMs reporting. Should certified equipment allow the operator to submit exceedance reports as opposed to the large data sets that are sometimes requested? Exceedance reporting is required by Rule/Permit whereas O&M plan dictates operations and record requests for inspections are verifying these operations.	100%
Operator should have the option to have inspector set up at facility for multiple days while inspection is being conducted - Conduct internal review of inspection procedure - evaluate to determine practicality of this approach.	On a case by case basis this can be an option if it benefits the inspector and operator to do so.	100%

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The time it takes to receive inspection reports for site visits should be decreased - Conduct internal review of inspection procedure.	While the results of an inspection are being evaluated, the inspector will provide a weekly status update to the facility. A standardized email will be developed for this purpose which is to simply provide acknowledgement that the report is in preparation. Supervisors will be expected to complete a review of a Title V inspection report (once completed by the inspector – unless more time is specifically requested) within one week of completion.	100%
Title V Inspection Report needs to be re-written to be concise and user friendly - Conduct a review of the existing inspection form and compare with other agencies to determine appropriate revisions if needed	Compliance Observation form has been re-written and waiting for signature line decision to be made to implement. 5/28/14 Form is completed, signature line not needed and form now in use, 6/25/14	100%
Compliance Observation form is not being used by all inspectors and is not user friendly. - Conduct a review of the compliance review form to determine if a procedure is necessary to provide guidance to staff regarding its completion	Compliance Observation form has been re-written and waiting for signature line decision to be made to implement. 5/28/14 Form is completed, signature line not needed and form now in use, 6/25/14	100%
Are thresholds in NTV permits adequately monitored avoiding issues until problem becomes serious - Develop protocol for review and conduct workshop to convey expectations	Discussed in Zone meetings the importance of thorough file reviews. Follow up training will be provided with Title V Workshop.	100%
Website should be used to submit reports and provide stakeholder means to make continuous improvement suggestions - Expand use of web-based report submittals.	Gather additional clarification on specific reports appropriate for web submittal and evaluate to determine potential. Create online reporting options. This will likely require Accela Citizen Access allowing permittees to interact with their permit and submit documents.	50%
Emissions Inventory should be online - Expand use of web-based report submittals - specifically the emissions inventory report.	Evaluation underway	50%
Monitoring and annual certification reports submitted to us not consistent. - Conduct a review of the semi-annual and compare with other agencies to determine appropriate revisions if needed	Has reviewed with ADEQ – 5/28/14 and again 9/3/14. They do not currently have procedure in place. Discussion with Inspector II and this item while not consistent in the way reports submitted the standardized submission form is improvement and this item is resolved.	100%
Reports sent to 1001 and 44th St may get lost. Need a better way to track/ acknowledge receipt - Advise permittees to submit reports to Div Manager. Incorporate submittals into a spreadsheet maintained in SharePoint	Letter has been created to remind permittees to submit to the Control Officer - to be mailed Letter is awaiting approval then will be sent out – 5/28/14	100%

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Reporting timeframes should be organized in a central calendar for TV permits - Develop in Outlook and/or a calendar that can provide notifications as due dates approach. Consider using Accela if appropriate.	Calendar Developed in Outlook waiting to populate anniversary dates for Title V permits by Afam. Afam completed all dates are in the calendar	100%
Submittal Report tracking Spreadsheet - See 4c	Spreadsheet is completed and updated by Afam	100%
Process to submit/SIRE to make Records more readily available - Create a form that identifies large documents/records and their stored location	The nomenclature document has been created, posted to Sharepoint and distributed to the department.	100%
Power Plant permits allow affirmative defense; contradicts PSD - Develop educational protocol for supervisors to provide guidance on how these types of violations should be addressed	PSD rule is under revision and issue needs to be discussed with Inspector II Dept can use enforcement discretion to allow affirmative defense in power plants but it does not protect plant from EPA, civil action.	100%
Deviation Reports are not entered in electronically timely and hard copies can be difficult to track down. - This relates to items 4a, 4b and 4d	Afam updates the Upset Log which contains all relevant information regarding deviations reported to the Dept.	100%
Handling StartUp/Shutdown Procedures are handled Case by Case which leads to inconsistency? - Develop protocol for review and conduct workshop to convey expectations	These procedures/thresholds are recorded in the permit conditions and Afam currently manages all start up/shut down cases for the Dept. Further training will be provided with the TV workshop.	100%
Fee Table Corrections to Synthetic Minor permits - Permits classified as Synthetic Minor should not be in Table B. These should be reclassified to Table A.	Permitting has fixed all of the Synthetic Minor permits	100%
Identify Synthetic Minor workload, train small source inspectors if they are to be included in the inspections - Insure that tasks are appropriately assigned	Inspector II classification has been approved, when positions filled Synthetic Minor's will only be inspected by Inspector II classification	100%
More Inspectors needed in TV - Establish Inspector II classification and sufficient number of positions to complete workload	Inspector II classification has been approved, when positions filled Synthetic Minor's will only be inspected by Inspector II classification	100%
Workload evaluation needed - Conduct workload assessment for each Zone	Title V Only.	100%
Send email without HPV preliminary form - Form isn't needed as long as relevant information is being sent to Eric in email	Eric has provided the inspector's the information needed to submit HPV without the form – 5/29/14	100%
Communicating the status of TV facilities - Need clarification on this issue	Also see 2j. A process where notification is given to the operator regarding an inspection weekly after an inspection has been put in place	100%
Coversheet Template for Reports Submitted to Dept that clarifies the documents being submitted. - Develop coversheet and provide guidance to permittees on submittal of submittal coversheet/checklist	Coversheet developed, once approved will begin using.	100%

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Provide more opportunity for OTC over NOV - Review issue with Policy Advisor.	The current OTC policy allows for OTC's over NOV's when certain criteria met and written explanation of Department interpretation of rule can be requested in writing. Beyond this would be a deviation from EPA policy.	100%
CEMs system requiring re-qualifying every 5 years is costly to operator while equipment is unchanged and working properly - Review issue by Permitting and Policy Advisor.	Permitting – cannot find a specific example to explain this topic but there are federal requirements to annually certify CEM's equipment.	100%
Less frequent Performance Tests - Review issue by Permitting and Policy Advisor.	The minimum allowable time between test allowable by federal limits is 5yrs. All performance tests are determined by the proximity to the standard for a given pollutant and the size of the facility. Performance test standards are very site specific. Will discuss further at stakeholder meeting.	**100%**
Violations for Deviations. Is a deviation always a violation – even if it is an OTC. - Other agencies say "no"	A deviation indicates that a permit condition was not met which is a violation. If the deviation is of the O&M plan that is a little more unclear?	**25%**
Identifying Insignificant Activities -	Important to remind facilities that it is a requirement of their permit to notify the dept of insignificant activities. Will reiterate to staff.	**100%**
Contractor records kept on site – permitted vs unpermitted contractors -	Even for activities considered short term there is EPA guidance indicating that these activities be noted as insignificant or general duty depending on size	**25%**
Incorporating rules (gas rule) by reference into permit to prevent out of compliance situations. - Discuss with EPA	.	**25%**
Best practices program similar to OSHA program that benefits members of program with reduced inspection frequency - While this is not currently feasible with our inspection program, there may be room to discuss with ADEQ a program they are implementing in the future.	.	**25%**
Is bar set too high for Dept Awards? Should emission reduction be most pressing criteria? - Application has been completed addressing this concern.	Complete	**100%**