DEEP Permitting
A Status Report

2013
Deputy Commissioner Macky McCleary

Connecticut Department of Energy and Environmental Protection
Executive Summary

Transformation Goals

- Faster
- More effective
- More efficient
- More responsive
- More predictable
- More transparent

Results

- **Lean** has reduced permitting timeframes, identified regulatory opportunities and produced metrics
- **Innovations** have resulted from new technology, regulatory tools and market-based approaches
- **Customer service** has improved
- **Transparency** has increased from permit fact sheets, pre-application meetings, website changes and newsletters
- **Customer feedback** is positive
Permit Processing Times Have Been Reduced

Average Processing Time for Select DEEP Permits, Pre- and Post-Lean

74% Overall Reduction

Connecticut Department of Energy and Environmental Protection
A waste receiving facility in Berlin was able to have its permit modification to add an additional solid waste stream and transport by rail in time to make the bidding process deadline for municipal contracts for ten towns.

In response to Storm Irene and building on Lean principles of continuous improvement, DEEP acted proactively with coming storm Hurricane Sandy to put in place emergency and temporary authorizations for repair of previously authorized seawalls that were damaged and removal of sand deposited from the storm. DEEP is developing a General Permit to cover repairs to storm damaged coastal structures such as seawalls in the future.
DEEP is Serving the Needs of Our Customers

The air is getting cleaner!

The water is getting cleaner!

Connecticut Department of Energy and Environmental Protection
Lean at DEEP

- To date, 52 teams have participated in Kaizen events
- More than 300 staff participants
- Wide range of projects including permitting and enforcement of air, waste, and water pollution control and land use programs; wildlife, fisheries, boating; and energy management
- Working with DOT, DECD, OPM, Siting Council and DAS on interagency processes
Why Lean? Making Government Work for You

- Internal operations are more efficient
- Staff is more engaged and has developed greater capacity
- DEEP has an increased ability to address new challenges
- Customer experience: improved timeliness, responsiveness, transparency, predictability

A Streamlined Future State of the OLISP Structures, Dredging and Fill Permit Application Process.
Lessons Learned from Lean

• Plan and Communicate
  – Including/partnering with affected parties in planning efforts
  – Revising application content and fact sheets
  – Pre-application meetings

• Standard Work
  – Creating checklists and Standard Operating Procedures
  – Targeting permits for fast-tracking

• Eliminate Waste
  – Removing redundancies and silos
  – Leveraging existing technology
Regulatory Opportunities- Streamlining the Notice of Application Provisions

• Modify CGS Sec. 22a-6g. Notice of application for permit.
  – A copy of the newspaper notice rather than a certified copy from the newspaper.
  – A self-certified statement that the applicant notified the chief elected official of the municipality in which the regulated activity is proposed
  – Application processing will be delayed until the applicant submits the certification statement.
## Metrics/KPIs - DEEP Permit Programs Average Permit Processing Times

**Feb 2013**

<table>
<thead>
<tr>
<th>&lt;0 to 1 Day</th>
<th>&lt;15 days</th>
<th>&lt;45 days</th>
<th>&lt;60 days</th>
<th>&lt;90 days</th>
<th>&lt;120 days</th>
<th>&lt;180 days</th>
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<tbody>
<tr>
<td>Dock Repair GP</td>
<td>COP</td>
<td>Swim Float GP</td>
<td>Processing of Asphalt Roof Shingle Waste for Beneficial Use &amp; Recycling GP</td>
<td>Drop Site Fac. GP</td>
<td>Solid Waste Facility Renewals</td>
<td>Beneficial Use Determinations</td>
<td>UIC (Subsurface) Permits</td>
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<td>USTs</td>
<td>GP Derelict Structure GP</td>
<td>OLISP Remedial GP</td>
<td>Recyclables Transfer Fac. GP</td>
<td>Addition of Grass Clippings at Registered Leaf Composting Facilities GP</td>
<td>Disruption Authorization</td>
<td>Solid Waste Landfills (new/mods)</td>
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<td>Boiler Blowdown WW GP</td>
<td>1 Day Collection</td>
<td>Beach Grading GF</td>
<td>Transporter Permit</td>
<td>Leaf Composting Facility Registration GP</td>
<td>Limited Processing Recycling Facility GP</td>
<td>Treat, Store or Dispose of Own RCRA HW</td>
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<td>Emergency engines</td>
<td>FCC Waiver</td>
<td>GCC Waiver</td>
<td>ACOE PGP</td>
<td>Leaf Composting Facility Registration GP</td>
<td>Recycling Recycling Facility GP</td>
<td>Solid Waste Demonstration Approval</td>
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<td>Boilers</td>
<td>Contam. Soils GP</td>
<td>SW Assoc. w/ Commercial Activity GP</td>
<td>NSR Revisions</td>
<td>Leaf Composting Facility Registration GP</td>
<td>Recycling Recycling Facility GP</td>
<td>Municipal WPCF NPDES</td>
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</table>
Benchmarking
Underground Storage Tank (UST) Compliance Rates up as much as 10%
Lean has Been Positive for Our Customers

- **Businesses**
  Wastewater discharge permitting program (NPDES) – reduce time to process permit by 77%

- **Homeowners**
  Office of Long Island Sound Programs (OLISP) Permitting - reduced permit review time by 70%

- **Municipalities**
  Clean Water Fund – payment processing reduced by more than 170 days

- **Environment**
  Underground Storage Tank (UST) - reduced the number of significant releases from USTs to the environment from a regular occurrence to an average of less than 1 per year and a significant drop in impacts to drinking water (contaminated wells), going from regular occurrences affecting entire neighborhoods to being highly uncommon events

Lean Team identified strategies to streamline and simplify environmental land use restriction application and approval process.
Technology- SIMS Software has Resulted in Effective Case Management, Permit Application Tracking and Customer Communication

- Site Information Management System (SIMS) provides the ability to view, maintain and track applications, permits, and enforcement actions.
- It also provides staff with their assignment lists, tracks processing time and provides reporting tools.
- Staff are able to effectively communicate application status with applicants.
Technology- Online Permits will Result in Faster, More Complete Submittals

- Online Permit with E-Logic
  - Direct submissions to DEEP staff
  - E-logic will prompt applicants to fill in missing information
- General permits/notifications first then individual permits
  - Stormwater General Permit
  - Underground Storage Tank (UST) Notification
Online Sportsman Licensing Provides Instantaneous Permits

From

Hunting and Trapping
Available only in the Hartford or 2 Field Offices (Long Lines)

Fishing
Available only in the Hartford and Town Halls

To

Available Online

Connecticut Department of Energy and Environmental Protection
FROM

• Resource Constraints
• Remote access needed
• Case management needed
• Improved workflow opportunities abound
• Customers have poor experience in contacting DEEP regarding complaints
• System needed to prioritize and select IT projects

TO

• Transparency: better visibility to organization’s data – improved service
• Flexibility: simplify architecture to increase agility and access from anywhere
• Data-Driven Decisions: data warehouse improves decision-making capability
• Connectivity: remote employee connection to business systems
• Responsiveness: self-service capabilities improve customer service
New Regulatory Tools have Provided Faster Alternatives to Individual Permits

- **General Permits**
  - Self-Certification - Pretreatment for Metal Finishers (coming soon) saves applicants up to **120 days**

- **Permit by Rule**
  - Combined Heat and Power (coming soon) saves applicants up to **1 year**

- **Notification**
  - State Inland Wetland, Water Diversion or Stream Channel Encroachment Line Permits if prior authorization with Army Corps (2012) saves applicants up to **192 days**
Market-Based Approaches- Beneficial Use Determinations (BUDs) Encourage the Growth of a CT Materials Economy

- BUDs allow manufacturers to use a product others would have otherwise paid to dispose.
- Reuse of materials saves millions of dollars for brownfields and infrastructure projects.
- Supporting the recovered materials reuse and recycling industries adds significantly to the Connecticut economy.

BUD permits the conversion of asphalt from roof shingles into road millings.
Customer Service

Connecticut Department of Energy and Environmental Protection
Pre-Application Meetings have Resulted in Better Informed Applicants and Higher Quality Applications and Ultimately a Faster Review Period

• Pre-application meetings include education on Natural Diversity Database (NDDB) review and public notice requirements
  – By License
    • NPDES Individual Permit Renewals
    • Solid Waste Individual Permits (includes notification on the possible need for Environmental Justice proceedings)
    • Long Island Sound Structures, Dredging and Fill
    • Inland Water Permits
    • Air New Source Review (Pre-Application and Application Review Meeting- 2-4 wks before submittal)
  – Multi-media
    • One meeting covers all licenses

CT-DEEP
Increased Transparency

Connecticut Department of Energy and Environmental Protection
Issued Permits have Been Consolidated into One Area on the DEEP Website

Connecticut Department of Energy and Environmental Protection
Application Redesign has Resulted in Better Consistency for Our Customers

- Common
  - Applicant information fields
  - Supporting documents (e.g., compliance history)
  - Certification
- Eliminated duplicative information
- Can fill out application electronically
- Embedded links to instructions and guidance and other required documents
Customers Can See Their Permit Status Online for the Stormwater General Permit

<table>
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<tr>
<th>Site Name</th>
<th>Street Address</th>
<th>Client Name</th>
<th>Application Date</th>
<th>Status</th>
<th>Pollutant Prevention Plan</th>
<th>Prepermit Planning 10/30/2015</th>
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<th>Permit Expiration Date</th>
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<td>Middletown</td>
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Connecticut Department of Energy and Environmental Protection
Perception of Connecticut’s Environmental Regulatory Climate has Improved Relative To Other States

Source: CBIA EPC Survey, 2012

Data from a Survey of EPC-Member Businesses that Operate in Other States

→ Net Negatives have decreased by 30% in the last 3 years.

Connecticut Department of Energy and Environmental Protection
Perceptions of customer service have improved over the last 4 years

How Would You Rate Customer Service At DEEP?

- **Poor/Fair (Net Negatives)**
  - 2008: 44
  - 2010: 43
  - 2012: 32

- **Good/Excellent (Net Positives)**
  - 2008: 52
  - 2010: 57
  - 2012: 61

- **No Opinion**
  - 2008: 4
  - 2010: 0
  - 2012: 7

Source: CBIA EPC Survey, 2012