



# Title V Minor Modifications

## **LEAN Event Report Out**

**Department of Environment &  
Conservation**

**Air Pollution Control**

**January 27, 2014**



#### Team Members:

- Lida Galbreath (APC)
- Travis Blake (APC)
- Jerry Swinea (APC)
- Jeff Twaddle (ERM)

## LEAN Event Team

- Steve Simpson (APC)
- James Smith (APC)
- Julie Aslinger (EnSafe)
- Team Leader – Mark Reynolds (APC)

Sponsor – Barry Stephens (Director - APC)

Executive Sponsor – Shari Meghreblian (Dep. Commissioner – TDEC)

Facilitators – Beth Shelton, Elaine Boyd, Ken Nafe

# Business Issues

- Lack of consistency in process across staff / varied interpretations of requirements
- Currently 33 pending minor modifications with 26 of the 33 already past the 90 day regulatory limit.



# Scope

- **In scope:**

**Starting point:** when the permittee submits notification of a modification that needs to be made



**Ending point:** completion of modification and closing internal documentation



- **Out of scope:** Permit changes other than Title V minor modifications

# Goals for Future State Process

- Transfer improvements already being utilized in Title V Administrative Amendments process
- Streamline process to reduce backlog
- Reduce paper in the process
- Increase percentage of Title V minor modifications approved / denied within regulatory time limit to meet goal of 95% by 2015



# Observations of Current State

- **Permitting Efficiency Report for Title V Minor Modifications**
  - Report for July 1 – Sept 30, 2013: 33% of permit applications reviewed within regulatory time limit
  - Annual report for 2012 - 2013 : 142 applications not approved / denied within regulatory time limit



# Recommendations

**Issue:** Lack of understanding of the criteria for a Title V minor modification.

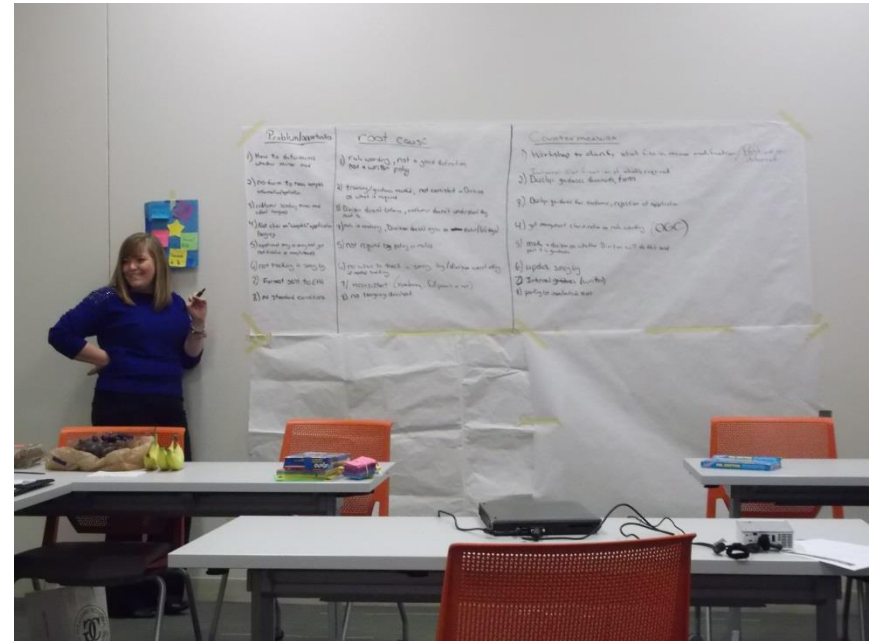
**Action:** Develop clear criteria on what constitutes a minor modification for staff and external customers. Develop SOP and provide staff with training. Post materials on the internet.



# Recommendations

**Issue:** Lack of detail in rules on which forms to submit with a minor permit modification.

**Action:** Develop guidelines and a checklist for what is required for a minor modification application (including any forms) that will be provided to customers and used by staff for the completeness determination.

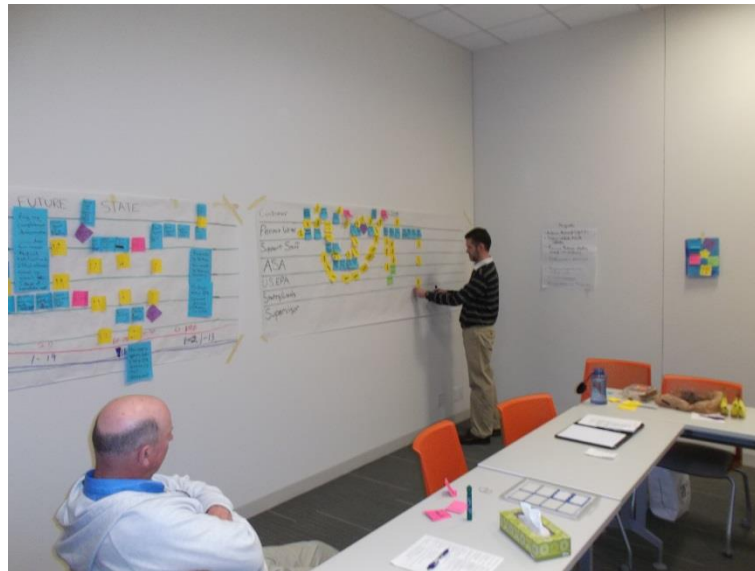




# Recommendations

**Issue:** Customer is not routinely notified of the receipt of the application or the completeness determination.

**Action:** New process recommends copying the customer on the email sent to EPA to notify them of the receipt of a complete application.

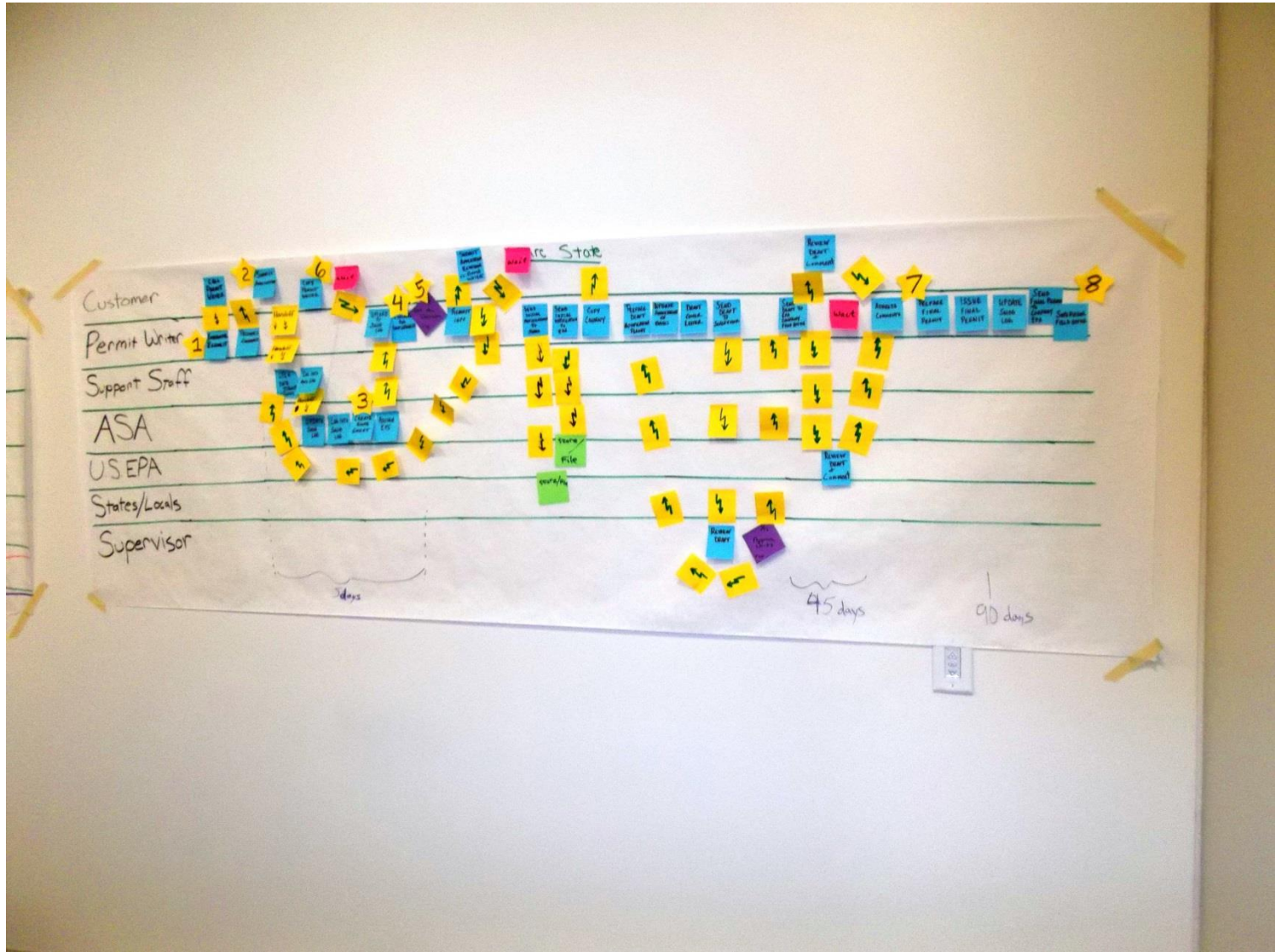


# Recommendations

**Issue:** Majority of minor modification applications are not meeting the regulatory timeframes for action within 90 days.

**Action:** Train staff on the use of the fields currently available within SmogLog for tracking completeness and final action. Work with ISD to modify SmogLog to allow tracking of date notification sent to EPA. Implement new process utilizing SmogLog for electronic transfer of information internally.

# Future State



# Parking Lot Issues

- There is a need for APC to consider compiling the new guidance being developed for several processes into a revised Title V Workshop Manual to replace the one produced several years ago.
- APC should consider developing standard permit conditions.



# Action Plan

What	When	Who
Create flow chart based on Future State	1/31/14	Elaine
Description of what is required with a minor modification application (e.g. certain forms like APC-1 and Index form) by customers for minor modifications	2/7/14	Julie, Jerry
Develop clear criteria on what constitutes a minor modification that will be provided to staff and customers	2/7/14	Travis
Develop guidelines and checklist for completeness determination	2/7/14	Julie, Jerry
Determine dates to be tracked and if modifications to SmogLog would be needed	2/7/14	Mark, Steve, Travis

# Action Plan

What	When	Who
Make a plan and schedule for the SmogLog modification to allow public view of assigned permit writer and contact info	2/7/14	Travis
Develop SOP based on flow chart , criteria and guidelines information	2/14/14	Mark, Steve
Modify route sheet to serve as SOP for minor modification process	2/14/14	Lida
Develop draft materials for internet posting	2/21/14	Jeff
Obtain clarification on notification of Fees for minor modifications that increase allowable emissions	2/21/14	Steve, Elaine

# Action Plan

What	When	Who
Review process post-Tech Track to see if changes to the process are required	TBD	Team
Pre-Implementation meeting with Sponsors	3/14/14	Mark, Elaine
Training of internal staff on new process	3/31/14	Mark /Team
Implement new process	4/1/14	APC

# Measuring and Sustaining Improvements

- LEAN follow up intervals:
  - 30 days ~ March 14, 2014 (Pre-implementation meeting)
  - 60 days ~ April 22, 2014
  - 90 days ~ June 4, 2014 (180-day follow up for Admin Amendments)
  - 180 days ~ October 10, 2014
- Metrics
  - Tracking of adherence to regulatory 90-day action requirement
  - Tracking of adherence to 5-day notification of EPA (requires SmogLog modifications)



# Bottom Line!

- Key Elements for Future: We are.....
  - Standardizing the process and clarifying the requirements to institute more consistency in the submissions from the customers and the review by the staff.
  - Taking the initial steps to streamline all workflow processes by providing tools to manage based on workflow deadlines.
  - Streamlining the process by utilizing an electronic review process.
- Result?
  - Minor modifications should be able to be completed within the regulatory time frame.
  - Customer and staff will have access to instructions on the process which should eliminate some of the current vagueness.

# Questions/ Comments

