

ARD Env-A 1400 RTAP Compliance Process

Summary

Create a more streamlined Env-A 1400 / RTAP process for small businesses



Using LEAN principles, NHDES ARD was able to create more standardized Env-A 1400 compliance demonstration, benefitting both NHDES staff as well as small businesses.

Team

Sponsors:

- Evan Mulholland
- Pat North
- Cathy Beahm

Area Supervisor:

- Mark Ledgard

Event Manager:

- Tom Guertin

Participants:

- Barbara Dorfscmidt
- Ed Peduto
- James Tilley
- Sara Johnson
- Karen Song ("Fresh Eyes")

Facilitators:

- Dan Hrobak
- Courtney Evans

Contact

Tom Guertin (x10650)

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The Process

All commercial entities in the State of NH are subject to Env-A 1400, which governs Regulated Toxic Air Pollutant (RTAP) emissions. Often, DES Air Resources Division (ARD) identifies these sources through inspections or complaints. DES ARD staff work with the affected source to ensure these sources are in compliance with Env-A 1400 through a compliance demonstration, whereby sources provide documentation that their RTAP emissions are below statewide limitations (AALs).

The Problem

- The path of a small business compliance determination, from initiation through closure, is not well-defined
- A significant amount of effort from both DES and the source is expended, only to find out the source does not use enough material to approach any of the limits (AALs) specified in Env-A 1400



The Goals

- Establish clear roles for each of the affected DES ARD sections involved
- Design a more efficient and standardized Env-A 1400 Compliance Determination process.
- Establish exemptions to Env-A 1400 for certain categories of businesses or establish BMPs for small quantity
- Establish appropriate process measures.

The LEAN Process

The event took place over four, 2-3hour sessions. We:

- Mapped the current process using swim lanes;
- Reviewed the current swim lane map and identified inefficiencies
- Brainstormed ways to improve process
- Mapped out a future state
- Created an implementation plan to ensure we would get to the future state.

The Results

Based on the work conducted by the team, the following successes were achieved:

- Standardized the process by establishing clear roles
- Reduced the typical compliance demonstration process by 62 days
- Currently developing standardized forms and procedures for internal and external use (within one to two months)
- Currently researching additional modeling scenarios/tools for quicker compliance determinations
- Currently determining which metrics to collect and to assess success
- Great LEAN training opportunity for all team members.

"The most beneficial part of the LEAN process, in my opinion, was to see everyone who is involved in Env-A 1400 RTAP compliance share the steps that they each go through when working with a small business. When different approaches were identified, the group was able to formulate a streamlined process that each DES section will now follow. The result is greater transparency with regards to the DES process, which helps small business know what to expect when they need to demonstrate compliance
 Karen Song, NHDES