

US EPA ARCHIVE DOCUMENT

Appendix F

Administrative Efficiency Data

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Summary of Administrative Efficiency Data

One goal of the Printer ERP was to discover whether any WDNR staff time or other administrative resources could be saved by ERP when compared with traditional source-specific permits for larger facilities or the newly created Registration Operation Permit or ROP (still in development at the time the ERP began, but in use for two years by writing of this final report). WDNR created the ROP to offer a simple permit that is issued in a very short time frame, for those facilities with low actual emissions of the criteria pollutants (particulate matter, nitrogen oxides, sulfur oxides, carbon monoxide, lead, and volatile organic compounds as the precursor for ozone) and both the state and federal hazardous air pollutants. The ROP also eliminates the need for future construction permits so long as the facility still meets the eligibility criteria after any changes are completed.

The ERP was designed so that the largest printers eligible would also be eligible for the ROP—facilities with emissions from 10 tons per year to less than 25 tons per year of each criteria pollutant. These printers were categorized as “medium” size printers under the ERP. A new permit exemption for printers with actual emissions less than 10 tons per year of each criteria pollutant was expected to be included in legislation prior to completion of the ERP. The “small” and “very small” printers in the ERP would be eligible for the new actual emissions based permit exemption, if other exemptions did not already apply.

We compare agency effort on data management, program development, permit review and inspection time.

Data Entry

When it comes to data entry and filing paperwork, the ERP saves at least 10 minutes for each permit/self-certification.

- Over time, WDNR staff found that traditional permits and ROPs are quite similar in processing time, around 30 minutes each.
- It took just 15-20 minutes on average for the project lead to enter data from self-certifications into the larger database for final analysis.

Air Permit Review

Program development

The ROP development itself, while a drawn-out process to get stakeholder review and support, did not take much longer than an average traditional permit takes to get issued – around 200-300 hours. On the other hand, ERP development takes much longer the first time around; in Wisconsin, it totaled 3620 hours. Each staff member or stakeholder provided estimates of time contributed to the early development stages of the project, which averaged 760 hours per year for two years for each of the two key staff developing materials, plus a total of 600 additional hours contributed by eight other WDNR and Commerce staff as well as external stakeholders. This may seem like a lot of effort, but consider that a few WDNR staff took nearly as much time to issue one very complex air permit. Furthermore, the ERP materials went beyond the air regulations and covered the full range of environmental requirements that apply to small printers. This analysis is just an observation, not a direct comparison of effort.

The permits do differ greatly in time required for an engineer's review: from 100-200 hours for each traditional permit, on average, to just 3 hours for each ROP.

Exemptions and ROPs – one time reviews

To compare ERP development to time spent issuing ROPs and reviewing exemption claims, we estimated the number of printers in Wisconsin that would be eligible for ROPs and the actual emissions based permit exemption. Printers that are “small” emitters of VOCs would qualify for the exemption, and “medium” emitters would be eligible for ROPs.

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In both rounds of site visits during the ERP, on average, Small emitters comprised 12.33% of the printers inspected, and Medium emitters comprised 4.05% of the facilities inspected.

Using our estimate of 698-832 printers in Wisconsin—estimated by extrapolating our drop out rates during baseline and post-certification evaluations—and then taking the average within that range, Wisconsin's printer population could be approximately 765 facilities. That is close to the trade groups' estimates of 1100 printers in Wisconsin.

Working from the higher population estimate from the trade groups, 12.33% of 1100 printers would indicate that approximately 135 printers could use the permit exemption, and 4.05% of 1100, or approximately 44 printers, could use the ROP.

If you average the total ERP development time of 3620 hours over the necessary permit actions or filings for the estimated 135 exemptions plus 44 ROPs, that's 20 hours per business to process the ERP. Over time, that initial development effort would also be spread over additional permit actions avoided and reduced inspection time in the future, for continued savings.

Construction and Renewals - periodic actions

We reviewed the historical permit activity across all ROPs, which shows that the printers in this group previously averaged 0.132 construction permit actions per year and 0.2 renewals per year that will no longer be needed. This historical activity was taken from 1996-2007 permit data for all printers with a ROP as of January 2009.

WDNR budgets 120 hours of time for construction permit review/issuance and 200 hours of time for a permit renewal. We then calculated the time saved on these periodic permit review actions:

- 1) Construction permits, 0.132 permit actions/year x 120 hours/permit = 15.84 hours
- 2) Permit renewals, 0.2 renewals/year x 200 hours/renewal = 40.00 hours.

Together, this represents a total of 55.84 hours per year of time **saved** on permit review, for each facility. For the 46 ROPs issued as of January 13, 2009, WDNR is therefore saving 2568.6 hours in avoided permit activity. If ERP could take the place of these ROPs, an additional 10 minutes of administrative time could be saved, for a total of 56 hours per facility or **2576 hours total**. In either case, the **time saved amounts to 1.37 staff** freed up for other activities. (We use the assumption of 1880 hours work time for each full time staff each year, excluding vacation and holidays.) Similar to WDNR's reasoning for excluding ROP sources from construction permits, the permit activity avoided under ERP would not trigger any significant emissions increases or applicability under federal requirements such as New Source Performance Standards or National Emissions Standards for Hazardous Air Pollutants for major sources.

Air Inspections

Inspection time for facilities with traditional and registration air permits was compared with the ERP facilities. Most of the inspectors who conducted ERP inspections also had experience with traditional permit or ROP holders. Including time for preparation, the actual inspection, follow-up, and travel, the inspection time required is:

- traditional inspections average 42.5 hours each,
- registration operation permit inspections average 16 hours, and
- ERP inspections average just 6.8 hours.

WDNR could conduct 46 ROP inspections in a year in the amount of time required for 17 traditional permit inspections (46 inspections x 16 hrs/inspection = 732 hrs; 732 hrs / 42.5 hrs/inspection = 17 traditional inspections) and likely address more compliance issues by doing so—the assumption being that ROP holders need additional assistance to understand how to implement the regulations that apply. That assumption may not apply where a ROP holder has previously had a traditional permit (whether major or synthetic minor) in the past. (Of the 46 ROPs that WDNR has issued, 29 facilities fall in that category.)

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If ROPs were replaced by ERP and an equivalent number of inspections were conducted, the time saved would be an **additional 423 hours per year** ($[16 \text{ hrs/ROP inspection} - 6.8 \text{ hrs/ERP inspection}] \times 46 \text{ inspections} = 423 \text{ hours}$).

The biggest issue for these non-traditional permits is travel time, but it likely applies similarly to ROP and ERP inspections, since one central person is more likely to be assigned those as opposed to individuals in each regional office.

Under current grant agreements with EPA Region 5, WDNR typically inspects only a few minor sources—printers that would be eligible for ROP or ERP. It is unknown whether EPA Region 5 would offer flexibility to make a trade between traditional inspections and minor source inspections in the future.

Air Program Savings

Ultimately, adding the time saved between permit-related activities and inspections, ERP would save the WDNR Air Program at least 2999 hours per year ($2576 + 423 = 2999$), or **time for 1.59 staff** each year.

Hazardous Waste and Waste Water Program Time

There is no comparable plan/permit review process for generators in the hazardous waste program, and typically WDNR does not inspect a large percentage of SQGs. Additional time savings would be realized if SQG inspections could also be replaced by ERP inspections. Based on a brief anecdotal survey of inspectors, inspections for smaller waste generators range from 4 to 15 hours, depending on the level of follow-up needed, averaging approximately 9 hours total.

In the wastewater program, an inspection for similar sized facilities would take approximately 8 hours on average. Typically, the wastewater program does not inspect small printers like the ERP facilities.

Summary Comparison

ERP inspections would not cover all the details that full compliance inspections in each program might, but such small facilities are not inspected in high numbers anyway. A comparison can give a sense of how WDNR could benefit if three programs' requirements were addressed through a single visit, subjected to the statistical analysis element of ERP to measure areas of concern, and the results then used to learn whether more detailed inspections might be necessary or at least worth spending resources on.

ERP

6.8 hrs/inspection

ROP + HW + WW

$16 + 9 + 8 = 33 \text{ hrs/inspection}$

$$[1 - 6.8/33] \times 100 = 79.3 \%$$

ERP reduces time by **80%** for addressing requirements for small facilities in three traditional programs.