



**PERMIT STREAMLINING
TASK FORCE
SUBCOMMITTEE
MEETING
December 10, 2024**

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**Permit Streamlining Task
Force Subcommittee**

December 10, 2024

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Agenda



Change of
Owner /
Operator
Guidelines



Permitting
Public Notices



Certified
Permitting
Professional
Program



Public
Comment

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Change of Owner / Operator Guidelines

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Comments

Change of Owner/Operator Guidelines

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Permitting Public Notices

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Permitting Public Notices

Overview

- Consolidation of Public Notice function is part of PEP
- Program Start: Launched in April 2024
- Streamlines the Rule 212 Public Notice distribution process
- Provides option for applicants to utilize District staff to distribute their public notices

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Public Notice Streamlining

Process Comparison

Existing Process

- Applicant performs public notice distribution
 - Applicant must distribute notice or find and secure contractor
- Contractor/Applicant contacts schools to generate an address list
 - Schools may be reluctant to work with non-governmental company to distribute notice
- Applicant notifies permit engineer once distribution is completed
 - This step may be overlooked or miscommunicated
- Permit engineer reviews and verifies distribution
 - Results in additional permitting resource impacts
- If deficiencies found, redistribution required
 - Resets 30-day comment period

New Process

- Applicant opts to use South Coast AQMD to distribute public notice
 - Applicant's primary contact is now District staff
- District staff conducts public notice distribution
 - Reduces applicant's time and effort
 - Standardized process
- Simplifies school communications
 - Reduces potential for delays with school communication
 - Schools more willing to work with government agency
- Simplifies verification procedures
 - Eliminates verification of distribution by permitting staff
 - Reduces risk of re-distribution

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Public Notice Distribution

New Workflow

- Upon applicant request, Special Projects Team contacts the school to initiate distribution to parents of students
 - Internal process allows for immediate hand-off from permitting engineer
- Staff identifies addresses within the surrounding area
- South Coast AQMD Mailroom completes the physical distribution
- Public Comment period begins once distribution is verified
 - **Duration:** 30 days minimum for public input and comments
 - Ensures community involvement and transparency in the permitting process

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Initial Efforts

Results and Feedback

- Public Notices
 - 24 completed notices
 - 8 notices in progress
- Estimated Increased Efficiency
 - Current process: 30 - 120+ days until distribution
 - New Process: 2 - 34 days until distribution (17-day average)
- Initial feedback from both participating facilities and permitting staff is positive

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Key Benefits of the Program

- Centralized Process
 - Streamlines the workflow and shortens timelines
 - Distribution and verification steps occur in-house with non-permitting staff
- Focus Hours on Applications
 - Allows permit processing engineers to concentrate on their primary work
- Option for Applicants
 - Applicants can choose to use South Coast AQMD for public notice completion, easing their workload

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Next Steps

- Inclusion of program into Rule 301 language
 - Current Rule 301 public notice fees do not include postage and materials
- Expanding to Title V public noticing
- Scoping staff capabilities and facility interest

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Comments

Permitting Public Notices

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Certified Permitting Professional Program

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Certified Permitting Professional Background

- Established by Health and Safety Code (HSC) Section 42300.2
- Current South Coast AQMD implementation
 - CPP examination administered annually
 - Lifetime certification with annual fees
 - Training materials: CPP manual
 - Third party training
 - CPP listing maintained on website
- Currently 120+ active CPPs
 - Approximately 80% consultants

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Certified Permitting Professional CA HSC Sec. 42300.2

- A district may establish a program to certify private environmental professionals to prepare permit applications. The program shall provide for all of the following:
 - a) **Certification by the district** of private environmental professionals who meet minimum qualifications established by the district and who successfully complete a district or district-approved training program in the methods of preparing permit applications. The **training program** shall include a description of **permit requirements established by the district**, as well as any additional requirements established by the district for applications submitted by certified private environmental professionals.
 - b) **Expedited review by district personnel** of permit applications that, at the option and expense of the permit applicant, are prepared by a certified private environmental professional.
 - c) **An audit program**, including periodic full district review of permit applications prepared by certified private environmental professionals, to determine whether or not district requirements for the preparation of applications have been followed.
 - d) **Decertification** of any certified private environmental professional found by the district to have done any of the following:
 - Knowing or negligently submitted false data as part of a permit application.
 - Prepared any permit application in a manner contrary to district requirements.
 - Prepared a permit application in connection with which the certified private environmental professional has **a financial conflict of interest** as defined in guidelines which shall be adopted by the district.

(Added by Stats. 1992, Ch. 1126, Sec. 3. Effective January 1, 1993.)

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Certified Permitting Professional

Desired Outcomes

- Pool of qualified resources for regulated community
- Expedited review of permit applications for enhanced submittals
 - Complete application and evaluation
 - Compliance demonstration and compliance assurance
 - Fully referenced data and process descriptions
- Increased utilization of CPPs
 - Increased availability of permitting staff to work on other projects
 - Utilize Permitting Working Group for more meaningful group discussions

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Enhanced CPP Program

Potential Efforts

- Establish and communicate application submittal standards
- Develop initial and ongoing training program
- Revisit certification process
- Program management
 - CPP accountability and tracking

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Potential Enhanced CPP Process

For Discussion

- Facility and/or CPP elects to use CPP option
- Permit application package submittal plus:
 - Complete and accurate evaluation, emission calculations, rule and health risk analyses, draft permits and conditions, recommendations
- Staff prescreening includes preliminary review of all elements of evaluation
- Straight to initial review by Senior Engineer
- Comments sent back to CPP
 - Multiple rounds of errors, revisions may result in off-ramping of permit application
 - Provides for streamlined approach
 - Potential consequences for insufficient or non-compliant applications

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Task Force Discussion

- Training Elements
- Development of Workflows
- Addressing Conflict of Interest provisions
- Permit fee mechanisms
- Program auditing requirements
- Cost recovery and resources for program management

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Comments

Certified Permitting Professional Program

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Other Business

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Tentative PSTF and PWG Meetings

2025

- Mar* - Gov. Board (PEP)
- Mar – PSTF or PWG*
- May – PSTF or PWG*
- June – PSTF or PWG*

* Tentative schedule and/or meeting formats

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Comments

Other Business

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Public Comment

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