SCAQMD Automation Efforts

Amir Dejbakhsh – Asst. DEO Engineering & Permitting

Permit Streamlining Task Force Sub-Committee
Meeting - December 15, 2017
Automation Efforts – Phase I

- **Forms:**
  - 400-A, 400-CEQA and 400-PS

- **On-line Permitting Modules:**
  - Dry Cleaning
  - Automotive Spray Booths
  - Gasoline Dispensing
FIRST PERMIT ISSUED ONLINE

December 2017
Automation Efforts – Phase II

- Certification / Registration Equipment
- Rule 222
- 400 – EX Forms
- Application Status Dash Board
SCAQMD Title V Program Evaluation Workplan

Amir Dejbakhsh – Asst. DEO Engineering & Permitting

Permit Streamlining Task Force Sub-Committee Meeting - December 15, 2017
Title V Program Evaluation - Background

➢ 2002 - Office of Inspector General recommended that EPA re-examine procedure to improve Title V Operating Permitting Program and to implement methods to expedite permit issuance.

➢ 2003 – In response, EPA developed an action plan to review Title V Operating Programs

➢ 2016 - EPA Region IX conducted an evaluation of SCAQMD Title V program

(https://www.epa.gov/CAA-permitting/title-v-evaluation-reports-California)
Title V Program Evaluation was conducted in the following stages:

1. EPA Region IX sent SCAQMD a questionnaire focusing on Title V program implementation in preparation of site visit at SCAQMD offices
2. EPA Region IX conducted internal review of EPA’s own set of SCAQMD Title V permits
3. EPA Region IX site visit of SCAQMD (March 22-26, 2016)
4. EPA Region IX sent results of SCAQMD’s Title V Program Evaluation to SCAQMD (September 2016)
5. SCAQMD submits to EPA Region IX its workplan to address EPA’s findings (August 2017)
Title V Program Evaluation - Findings

EPA Region IX found that SCAQMD implements Title V program in an effective and efficient manner. However, the final report identifies the following opportunities for program improvement:

- Statement of Basis Documentation for Initial, Renewals and Revisions
- High Level Incorporation by Reference (NSPS, NESHAP, etc.)
- Permit Availability
- Community Outreach
- EPA 45-day Review Period
- Reclassification as a Synthetic Minor Source (Title V Exclusion Guidelines)
Title V Program Evaluation - Workplan

- Statement of Basis Documentation - Phased-in approach
  - Initial Title V Permits – January 2018
  - Renewals – At minimum 10% of renewals starting in calendar year 2018
  - Modifications – Only for De-Minimis Significant and Significant Revisions starting in January 2018

- High Level Incorporation by Reference (NSPS, NESHAP, etc.)
  - Same phased-in approach as described above

- Permit Availability
  - Electronic copy of all Title V permits on-line by end of second quarter in 2018
Title V Program Evaluation - Workplan

- Community Outreach
  SCAQMD will work with EPA to develop and expand its outreach programs to linguistically isolated communities

- EPA 45-day Review
  In the event of a public notification, EPA 45-day review starts only after we have forwarded all comments and responses to EPA

- Reclassification as a Synthetic Minor Source (Title V Exclusion Guidelines)
  SCAQMD will be developing guidelines by first quarter in 2018