

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
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FIRST PERMIT ISSUED ONLINE



December 2017

Automation Efforts – Phase II

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

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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>)

SCAQMD Title V Program Evaluation - Stages

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