PERMIT STREAMLINING TASK FORCE SUBCOMMITTEE MEETING December 16, 2020

Permit Streamlining Task Force Subcommittee
December 16, 2020
Pending Application Inventory

Pending Permit Application Status Dashboard

Online Tools Development

Permit Processing Handbook

Other Issues and Public Comment

Pending Application Inventory Update
Permit Processing
2016 Inventory Reduction Initiative

Pending Applications
(2016 – 2020)

Achieved and continue to maintained 50% reduction goal set in 2016

Pending Applications less PCs Issued
(2016 - 2020)

Ongoing Goal
Maintain pending applications without PC issued between 2,250 and 2,500
Inventory Management During COVID-19

- > 80% Engineering Staff Teleworking
- Increased electronic submittals
  - US Mail routing
  - More electronic payment options
- Closely monitoring incoming applications
- Stay at home impacts:
  - HQ not open to public
  - Field visits
  - Face to face meetings

COVID-19 Permit Application Trends
Emission Trends

As of October 30, 2020

Permit Activity

*Preliminary data as of November 30, 2020
Permit Activity (Cont.)

**Equipment Applications Received**
(Percent, by Assigned Fee Schedule)

<table>
<thead>
<tr>
<th>Year</th>
<th>Small Business</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019 (Jan-Nov)</td>
<td>7%</td>
<td>93%</td>
</tr>
<tr>
<td>Total</td>
<td>2,929</td>
<td></td>
</tr>
<tr>
<td>2020 YTD (Jan-Nov*)</td>
<td>8%</td>
<td>92%</td>
</tr>
<tr>
<td>Total</td>
<td>2,135</td>
<td></td>
</tr>
</tbody>
</table>

*November 2020 numbers preliminary*
Permit Activity (Cont.)

**Equipment Applications Submitted**
(Percent, New vs. Existing Facilities)

2019 (Jan-Nov)
(2,929 Total)
- Existing Facilities: 79%
- New Facilities: 21%

2020 YTD (Jan-Nov*)
(2,135 Total)
- Existing Facilities: 80%
- New Facilities: 20%

*November 2020 numbers preliminary

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Permit Activity (Cont.)

**Equipment Applications Received**
(New / Modified / Change of Condition)

2019 (Jan-Nov)
(2,929 Total)
- New: 65%
- Modified: 28%
- Change of Condition: 7%

2020 YTD (Jan-Nov*)
(2,135 Total)
- New: 61%
- Modified: 33%
- Change of Condition: 6%

*November 2020 numbers preliminary
Pending Permit Application Status Dashboard Update

Governing Board initiative to increase transparency

- Online ability to view status of individual applications
- Integrate with existing F.I.N.D. application
Dashboard Status Indicators

- Two status indicator types:
  1. Time elapsed indicator
  2. Application status indicators
- Status progress bar:

Public Participation and Development

- Initial Internal Roll-Out Mid-2018
- Multiple Software Enhancements
- Data Verification
- Launched to Public May 2020

F.I.N.D. https://xappprod.aqmd.gov/find
Pending Permit Application Status Dashboard
Initial Case Study

<table>
<thead>
<tr>
<th>Date</th>
<th>Status</th>
<th>October 2019</th>
<th>April 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 2019</td>
<td>In Process</td>
<td></td>
<td>Awaiting Facility Action</td>
</tr>
<tr>
<td>Awaiting South Coast AQMD Action</td>
<td></td>
<td></td>
<td>Awaiting South Coast AQMD Action</td>
</tr>
<tr>
<td>November 2020</td>
<td>In Process</td>
<td>Awaiting Facility Action</td>
<td>Awaiting Facility Action</td>
</tr>
</tbody>
</table>

Pending Permit Application Status Dashboard
November 2020 Snapshot

<table>
<thead>
<tr>
<th>Date</th>
<th>Status</th>
<th>October 2019</th>
<th>November 2020</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>November 2020</td>
<td>In Process</td>
<td>Awaiting Facility Action</td>
<td>Awaiting Facility Action</td>
</tr>
</tbody>
</table>
# Pending Application Status Dashboard

## Initial Observations - Snapshot (October 2019, cont.)

<table>
<thead>
<tr>
<th>Completeness Determin. (Facility Action)</th>
<th>In Process</th>
<th>Awaiting Facility Action</th>
<th>Awaiting South Coast AQMD Action</th>
</tr>
</thead>
</table>
| A/I Request Related App A/I Fee Resolution | 14%  
1%  
< 1% | Engineering Evaluation and Administrative Processing | Compliance  
Review Draft  
Public Notice Distr.  
Conduct Source Test Awaiting Constr. | 5%  
1%  
< 1% |
|  |  |  | Supv/Mgr Review Related App Proc.  
Source Test Review Policy Review Field Eval Other Agency Rev. Public Notice HRA / Modeling | 7%  
5%  
4%  
3%  
3%  
1%  
1%  
< 1% |

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# Pending Permit Application Status Dashboard

## April 21, 2020 Snapshot

<table>
<thead>
<tr>
<th>ComplDet (Facility Action)</th>
<th>In Process</th>
<th>Awaiting Facility Action</th>
<th>Awaiting South Coast AQMD Action</th>
</tr>
</thead>
</table>
| Add. Info. (A/I) Req. Related App A/I Fee Resolution | 12%  
< 1%  
< 1% | Engineering Evaluation and Administrative Processing | Compliance  
Review Draft  
Public Notice Distr.  
Conduct Source Test Awaiting Constr. | 1%  
1%  
< 1%  
5%  
6% |
|  |  |  | Supv/Mgr Review Related App Proc.  
Source Test Review Policy Review Field Eval Other Agency Rev. Public Notice HRA / Modeling | 8%  
3%  
3%  
1%  
1%  
< 1%  
< 1% |
## Pending Permit Application Status Dashboard

**November 20, 2020 Snapshot**

<table>
<thead>
<tr>
<th>Completeness Determin. (Facility Action)</th>
<th>In Process</th>
<th>Awaiting Facility Action</th>
<th>Awaiting South Coast AQMD Action</th>
</tr>
</thead>
</table>

### Launched

**Discussion / Improvement suggestions**
Online Filing Update

Online Rule 222 Registration

- Three main registered equipment types
  - 222-A, Negative Air Machines (Asbestos)
  - 222-B, Boilers (1-2 mmbtu/hr)
  - 222-C, Commercial Charbroilers
- Represents ~ 80% of R222 Registrations
- Online Filing and Issuance

Average Annual Registrations (2016-19)
### Online Filing Activity

- Good utilization of Negative Air Machine module
- Extended outreach to asbestos contractors
- Other modules limited activity due to recent current events
- Planned additional outreach to dry cleaners

### Development

- New software releases for data cleanup
- Incorporate public notice guideline
- Emergency IC Engine registration in review
- Workflow updates
  - “As is” process review complete
  - Lessons learned in expanded teleworking environment
Workflow
"As-Is" Process Flow

Permit Processing
Handbook Update
Updating Permit Processing Handbook

Goals:
- Update handbook to reflect current requirements and practices
- Ensure consistent evaluation of similar equipment and resultant permit requirements
- Primary purpose for internal use for training new staff and to promote efficient permit processing and best practices
- Provide public and permit applicants insights to data needs and permit evaluation criteria

Table of Contents

A. Introduction
B. Permitting Authority
C. Permit Processing Overview
D. Permit Application Types and Completeness Considerations
E. Emissions Characterization
F. Regulatory Requirements- Overview
   a. Federal and State Requirements
   b. South Coast AQMD Rules
   c. Regulatory Considerations
   d. General Rules
   e. Source-Specific Rules (Reg XI)
G. Regulatory Requirements – Detailed Review
   a. Rule 212 Public Notice
   b. Reg XIII: New Source Review
   c. Reg XIV: Toxics and Other Non-Criteria Pollutants
H. Permit Writing Guiding Principles
I. Permit Evaluation Template

EMISSION SOURCE CHAPTERS
   Equipment and Process Categories
   Control Equipment
Commitment

- Overview sections
- Five equipment chapters:
  - Abrasive Blasting
  - Dry Cleaners
  - Emergency IC Engines
  - Gasoline Refueling
  - Spray Booths

Progress

- Overview sections
- Equipment chapters:
  - Unconfined Abrasive Blasting
  - Dry Cleaners
  - Gasoline Service Stations
  - Spray Enclosure – Fundamentals
  - Spray Enclosure – Special Cases

Sample chapters
(Gasoline Service Stations)

<table>
<thead>
<tr>
<th>Table of Contents</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 General Description</td>
<td>1</td>
</tr>
<tr>
<td>1.2 Process and Control Equipment</td>
<td>2</td>
</tr>
<tr>
<td>1.2.1 Equipment Description</td>
<td>6</td>
</tr>
<tr>
<td>1.3 Emission Factors</td>
<td>8</td>
</tr>
<tr>
<td>1.4 Calculations</td>
<td>9</td>
</tr>
<tr>
<td>1.4.1 Operational Data</td>
<td>10</td>
</tr>
<tr>
<td>1.4.2 Emissions Calculations</td>
<td>12</td>
</tr>
<tr>
<td>1.4.3 Rule 140V Calculations</td>
<td>13</td>
</tr>
<tr>
<td>1.5 Rules Evaluation</td>
<td>16</td>
</tr>
<tr>
<td>1.6 Policy Documents</td>
<td>16</td>
</tr>
<tr>
<td>1.7 Permit Operating Conditions</td>
<td>16</td>
</tr>
<tr>
<td>1.8 References</td>
<td>48</td>
</tr>
<tr>
<td>Sample Evaluation</td>
<td>49</td>
</tr>
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| Figure 1-3, Sample MCR Calculation (Throughput = 300,000 gallons/month) | 11 |
| Figure 1-4, Example MCRu Table in Cancer Burden Tool | 12 |
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Sample chapters
(Gasoline Service Stations, cont.)

EMISSION FACTORS:
The destruction and conversion of VOCs from gasoline service stations and
storage tanks is an important aspect of air quality management. The table below
summarizes the emission factors for gasoline service stations and storage tanks.

<table>
<thead>
<tr>
<th>Process</th>
<th>Emission Factor (mg/l)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loading</td>
<td>0.05</td>
</tr>
<tr>
<td>Breathing</td>
<td>0.02</td>
</tr>
<tr>
<td>Refueling</td>
<td>0.03</td>
</tr>
<tr>
<td>In-Plant</td>
<td>0.01</td>
</tr>
<tr>
<td>Spillage</td>
<td>0.005</td>
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<table>
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<td>0.01</td>
</tr>
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<td>In-Plant</td>
<td>0.005</td>
</tr>
<tr>
<td>Spillage</td>
<td>0.0025</td>
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</table>

Sample chapters
(Spray Booth, Fundamentals)

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<td>3. Pipeline Systems</td>
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<td>4. Valves and Fittings</td>
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<td>5. Control Systems</td>
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<td>6. Pressure Systems</td>
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<td>7. Vacuum Systems</td>
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</table>
Sample chapters
(Spray Booth, Fundamentals, cont.)

Next Steps

Early 2021
- Confined Abrasive Blasting
- Dry Particulate Controls
- Crematories
- Emergency IC Engines

Additional Chapters
- Boilers, SCRs
- Petroleum Storage Tanks
- Asphalt, Concrete Batch Plants
- Lead Melting
- IC Engines
- Printing Operations
- RTOs, Refinery Flares, Bulk Loading/Unloading
- Carbon Adsorbers
Feedback

- Volunteers to review and provide feedback on:
  - Gasoline dispensing facilities
  - Spray booth
- Type of feedback
  - Level of detail
  - Format / readability
  - Clarification points
  - Additional supporting references / citations

Other Business
Public Comment