



**PERMIT STREAMLINING
TASK FORCE
SUBCOMMITTEE
MEETING
June 24, 2020**



Permit Streamlining Task Force Subcommittee

June 24, 2020

Agenda



Pending
Application
Inventory



Pending Permit
Application
Status
Dashboard



Online Tools
Development



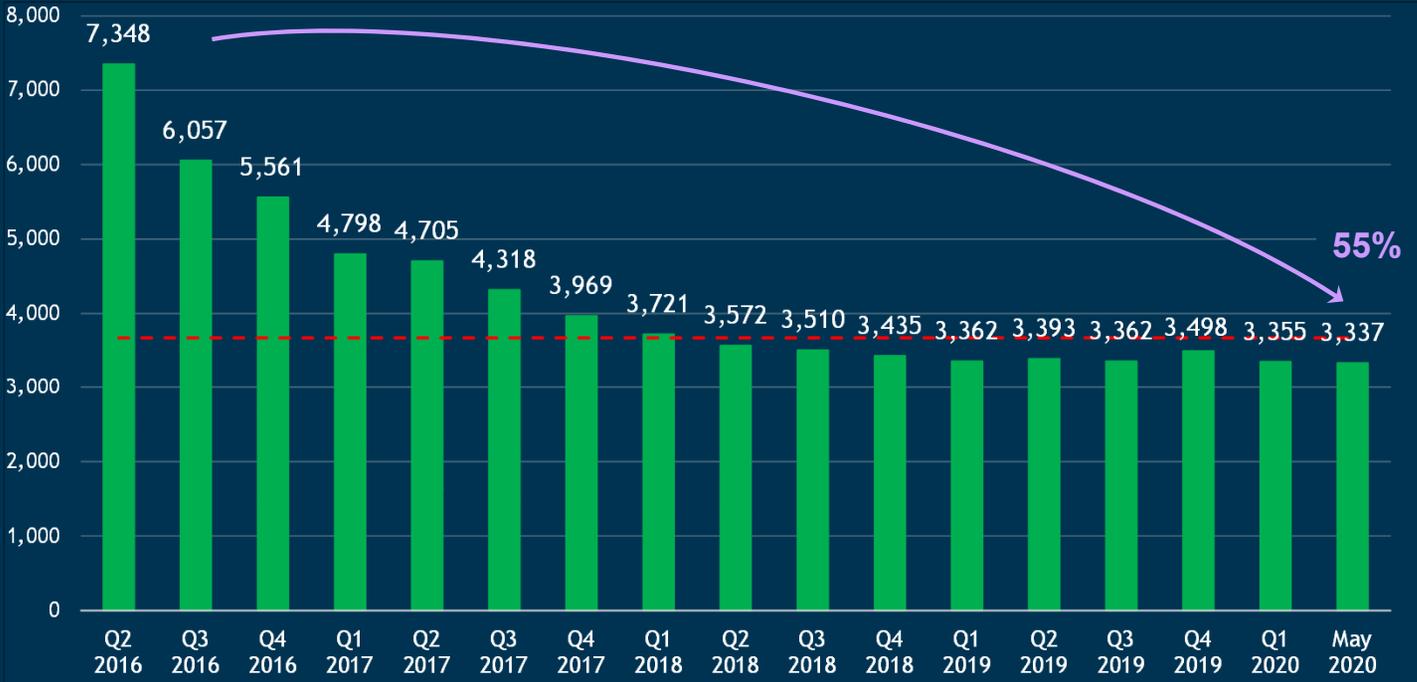
Permit
Processing
Handbook



Public
Comment

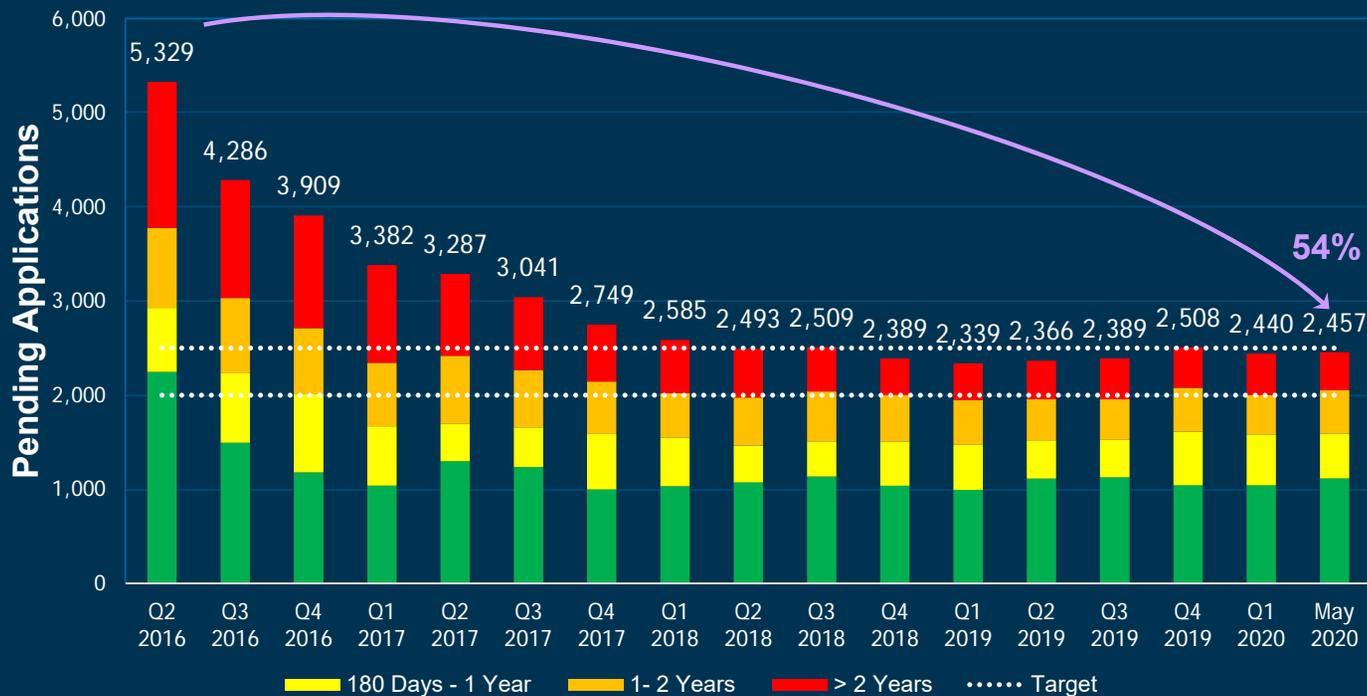
Pending Application Inventory Update

Pending Applications (2016 - 2020)



**Maintaining
50%
Reduction**

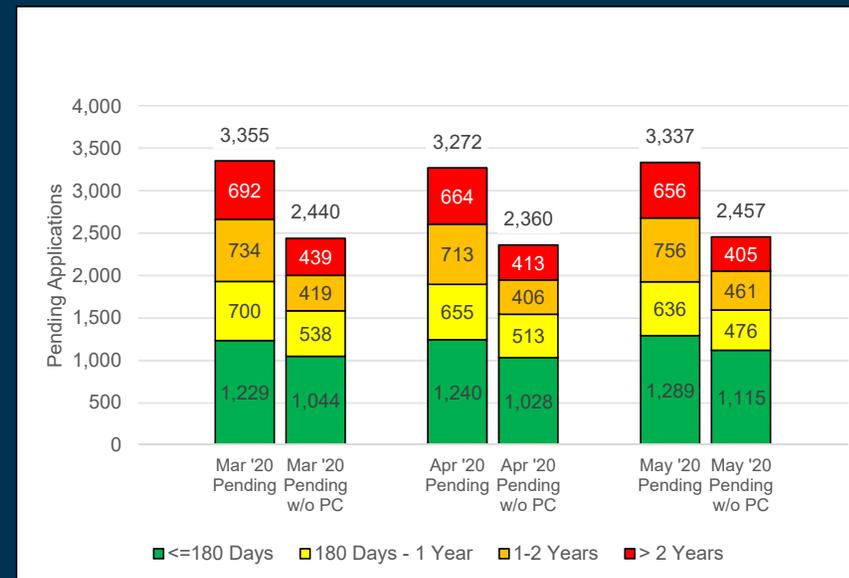
Pending Applications less PCs Issued (2016 - 2020)



Ongoing Goal
Maintain pending applications without PC issued between 2,250 and 2,500

Inventory Management During COVID-19

- > 80% Engineering Staff Teleworking
- Bootstrapped electronic permit processing
- Closely monitoring incoming applications
- Stay at home impacts:
 - Field visits
 - Face to face meetings
 - CPP exam



Expanded teleworking provides an opportunity to explore paperless processing approaches

Pending Permit Application Status Dashboard Update

Pending Permit Application Status Dashboard

Governing Board initiative to increase transparency

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

SENTINEL PEAK RESOURCES CALIFORNIA, LLC Close

Address: 1400 N MONTEBELLO BLVD, MONTEBELLO, CA 90640

Facility ID: 184288

Status: ACTIVE

Back Fees Due: No.

SIC Code: 1311 CRUDE PETRO AND NATURAL GAS

Equipment List 30 Results

IF	Sort: Application Number	
609423	602853	602159
FLARE, OTHER	FACILITY PERMIT AMEND- RECLAIM ONLY	MICRO-TURBINE NOT NAT GAS, METHANOL OR LPG
Application Status : APPLICATION CHANGED FROM CLASS I - III	Application Status : BANKING/ PLAN GRANTED, NON BILLABLE	Application Status : APPLICATION CHANGED FROM CLASS I - III
Application Date : 12/26/2018	Application Date : 04/06/2018	Application Date : 03/27/2018
Type : Control	Type : Basic	Type : Basic

South Coast AQMD

Facility Information Detail (F.I.N.D.)

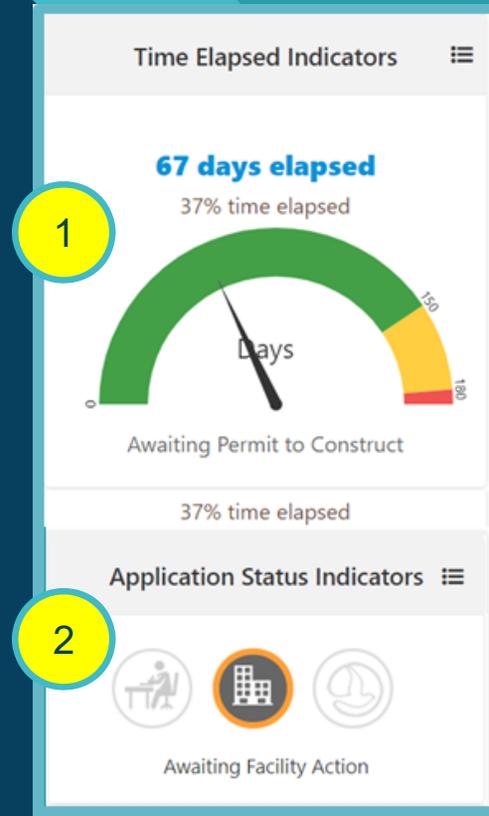
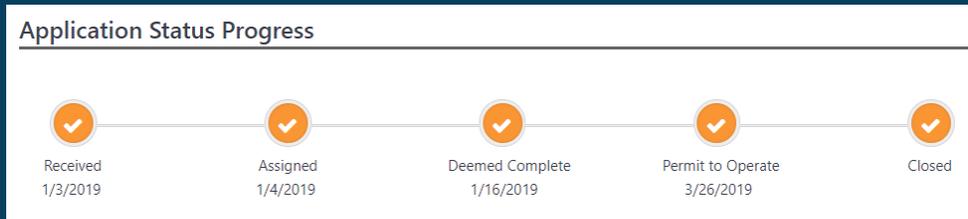
Select Search Type

Find a Facility REC

Name Street City Zip

Dashboard Status Indicators

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



Public Participation and Development (Cont.)

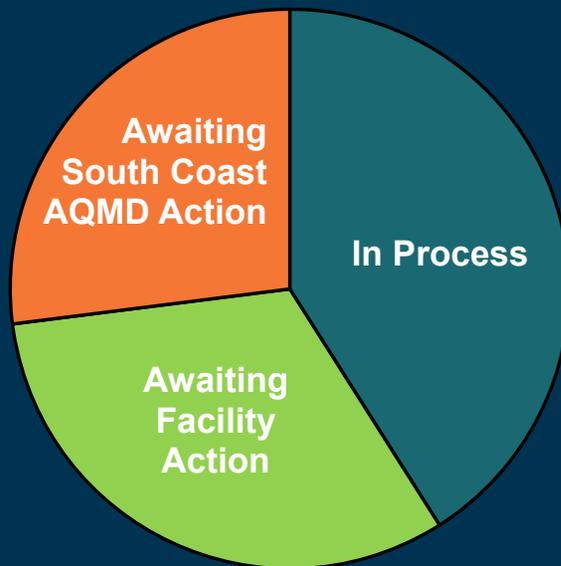
- Initial Roll-Out Mid-2018
- Multiple Software Enhancements
- Testing with Full Enhancements
- Data Verification Over Last 6 Months

F.I.N.D. <https://xappprod.aqmd.gov/find>

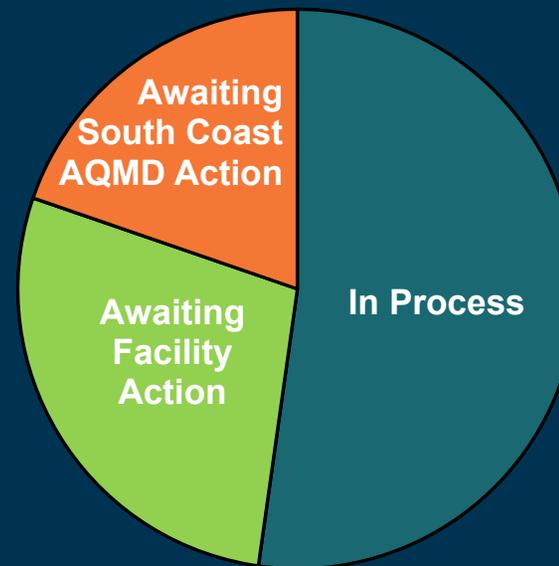
Pending Permit Application Status Dashboard

Initial Observations

October 2019



April 2020



Pending Application Status Dashboard

Initial Observations - Snapshot (October 2019, cont.)

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
A/I Request	14%	Engineering Evaluation and Administrative Processing	41%	Compliance Review Draft	5%	Supv/Mgr Review	7%
Related App A/I	1%			Public Notice Distr.	1%	Related App Proc.	5%
Fee Resolution	< 1%			Conduct Source Test Awaiting Constr.	< 1%	Source Test Review	4%
					6%	Policy Review	3%
					3%	Field Eval	3%
						Other Agency Rev.	1%
						Public Notice	1%
						HRA / Modeling	< 1%

Pending Permit Application Status Dashboard

April 21, 2020 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add. Info. (A/I) Req.	12%	Engineering Evaluation and Administrative Processing	52%	Compliance	1%	Supv/Mgr Review	8%
Related App A/I	< 1%			Review Draft	1%	Related App Proc.	3%
Fee Resolution	< 1%			Public Notice Distr.	< 1%	Source Test Review	3%
				Conduct Source Test	5%	Policy Review	1%
				Awaiting Constr.	6%	Field Eval	1%
						Other Agency Rev.	1%
						Public Notice	< 1%
						HRA / Modeling	< 1%

Launch

- Increases transparency and communication with facilities and community
 - Provides visual feedback on status
 - Provides visual indicator on time elapsed
 - Assists staff with workload management
- Supports internal resource allocation

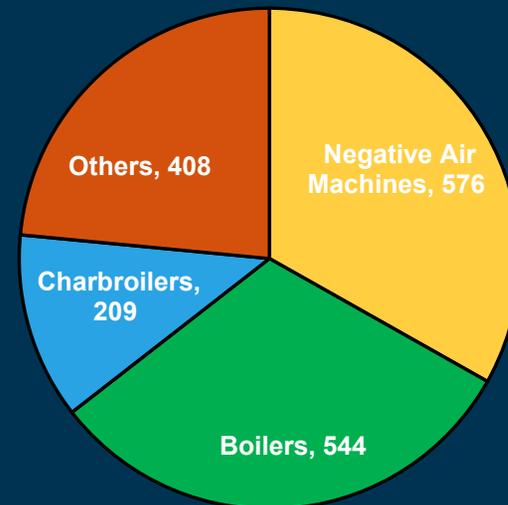


Online Filing Update

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)



■ Negative Air Machines ■ Boilers ■ Charbroilers ■ Others

Online Filing Activity

Online Filing Completions



- 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

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
- Efficient permit processing and effective training
- Provide public and permit applicants insights to data needs and permit evaluation criteria



Detailed Outline

- A. Introduction
- B. Permit Processing Overview
- C. Application Acceptance Requirements
- D. Emissions Characterization
 - a. Criteria Pollutants
 - b. Toxic Air Contaminants
- E. 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)
- F. Regulatory Requirements – Detailed Review
 - a. Rule 212 Public Notice
 - b. Reg XIII: New Source Review
 - c. Reg XIV: Toxics and Other Non-Criteria Pollutants
- G. Permit Writing Guiding Principles
 - a. Equipment Description
 - b. Permit Conditions
 - Condition Types
- H. Permit Evaluation Template
- I. Equipment and Process Categories
- J. Control Equipment

Chapters

- Introduction chapter

- Permit Processing Overview

- Includes: Application Submission, Prescreening, Regulatory Analysis, and Final Processing...

- Application Acceptance Requirements

- Facility category, equipment category, application type, fees required, etc.

- Overview of common equipment types

- Background information on permit units, calculations, rules, and common conditions

A. Introduction

The South Coast Air Quality Management District (South Coast AQMD) was created in 1977, but its legacy of air pollution control extends back to 1947, when the Los Angeles County Air Pollution Control District became the first regional air quality agency in the world. In 1973, the U.S. Environmental Protection Agency published a second edition of the Air Pollution Engineering Manual known as AP-40. This nearly 1000-page manual was developed exclusively by the Los Angeles Air Pollution Control District, and was published by the EPA to make their engineering innovation in the air pollution control field more accessible to those new to the field. The manual included overviews of technical aspects of air emissions from common equipment categories, as well as 23 pages constituting the entire APCD rulebook.

The South Coast AQMD created an internal Permit Processing Handbook in 1989 with fifteen sections representing the most common types of equipment routinely issued operating permits. The handbook was intended to act as a training resource for District staff, providing the basis for standardized permit conditions, and thus enhancing permit processing efficiency. The primary objectives of this updated version of the Permit Processing Handbook are unchanged, but this version is intended to also be made available to the public to enhance transparency and accountability with the regulated community. It is also hoped that this handbook will allow the regulated community to submit applications that are complete and adequately demonstrate that equipment can comply with applicable rules and regulations.

The current South Coast AQMD rulebook has expanded considerably beyond the LA APCD's original 23 pages. As efforts to attain the various National Ambient Air Quality Standards (NAAQS) require greater emissions reductions from a wider variety of sources, new rules are being adopted and existing rules amended on a continuously ongoing basis. As a result, the handbook should be considered a starting point for analysis, and in no way should be construed as limiting the applicability of new or amended rules and requirements. Although it is intended that individual sections of the handbook will be updated as needed, it is important for any user to be aware of the potential for new requirements effective after the date of the handbook section.

Due to the complexity of the local and federal regulations and their applicability to facilities of different sizes and levels of emissions, permit applications are still evaluated on a case-by-case basis. Individual circumstances may require deviations from the standardized conditions. This handbook will not fully consider all of the unique cases that may exist, but is intended to act as a basic resource or starting point for all evaluations, including more complex ones. The standard or typical conditions listed in the handbook in no way prevent the District from imposing additional requirements as needed.

Table of Contents - Draft

Example: Gas Stations

Contents

1.1	General Description	2
1.2	Process, Controls, and Emissions	3
1.2.1	Process and Control Equipment.....	3
1.2.2	Emission Factors.....	6
1.3	Calculations.....	7
1.3.1	Operational Data.....	7
1.3.2	Emissions Calculations	8
1.3.3	Rule 1401 Calculations	8
1.4	Rules Evaluation.....	12
1.5	Equipment Description	14
1.6	Permit Operating Conditions	16

Excerpt from Gas Station Draft

1.2 Process, Controls, and Emissions

1.2.1 Process and Control Equipment

The process of storage and dispensing of gasoline begins with tanker trucks delivering gasoline to the facility. A truck will pull up next to a UST and attach a vapor hose and liquid hose from the truck to the UST. Gasoline is then transferred in bulk into the UST. As the gasoline liquid level rises in the tank, the vapor headspace decreases. The vapors are pushed from the UST into the tanker truck where emissions are captured. This fuel transfer from the tanker truck to the UST is known as Phase I transfer. An illustration of Phase I fuel transfer can be found in Figure 1.2-1.

Phase I Enhanced Vapor Recovery (EVR) is the control equipment required for Phase I transfer at gasoline service stations. The equipment includes spill containers, a product (liquid gasoline) dust cap, vapor dust cap, product adaptor, vapor adaptor, pressure/vacuum vent valve, drop tube, overfill prevention device, and more. The California Air Resources Board (CARB) certifies Phase I equipment under specific Executive Orders which correspond to different manufacturers. Facilities are required to install one of these certified Phase I EVR systems at their site. These systems are:

- Phil-Tite/EBW/FFS Phase I Vapor Recovery (VR-101)
- OPW Phase I Vapor Recovery (VR-102)
- CNF Manufacturing Phase I Vapor Recovery (VR-104)
- EMCO Wheaton Retail Phase I Vapor Recovery (VR-105)

The process of storage and dispensing continues with the transfer of fuel from the USTs to the tanks of motor vehicles. Motor vehicles pull up to a dispenser, insert a gasoline nozzle into the vehicle fill pipe, and then start dispensing fuel into their fuel tank. As the liquid level of the vehicle tank rises, the vapor headspace decreases. The nozzle creates a seal with the vehicle fill pipe to prevent vapors from escaping the system. These vapors are captured by the nozzle and are rerouted through the dispensing hose and vapor lines back into the UST. This is possible due to gasoline nozzles and hoses having two separate pathways, one for liquid product flow, and one for vapor return. The fuel transfer from the UST to motor vehicles is known as Phase II transfer. An illustration of Phase II transfer can be found in Figure 1.2-1.

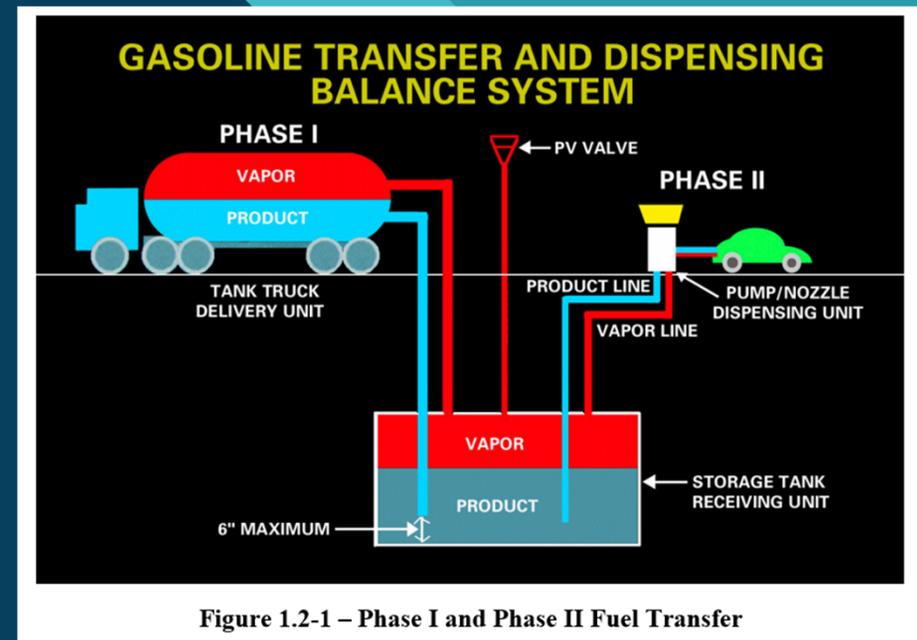


Figure 1.2-1 – Phase I and Phase II Fuel Transfer

Current Contents for Each Chapter

(Grayed lines indicate extra sections that only one chapter contained. Spray Enclosures also had some, but too many to add.)

1989 Abrasive Blasting Chapter	Confined Abrasive Blasting	Gas Stations	Dry Cleaning	Spray Enclosures (*described separately for each type: liquid, resin, and thermal)	Unconfined Abrasive Blasting
• General Description	• General Description	• General Description	• General Description	• General Description	• General Description
• Permit Units	• Permit Units	• Process and Control Equipment	• Permit Units	• Permit Units* • Types • Permit Boundaries	• Methods • Materials • Permit Units
	• Emissions	• Emission factors	• Emissions	• Emission Control Techniques*	• Emissions
• Calculations	• Calculations	• Calculations	• Calculations	• Calculations*	• Calculations
• Rules	• Rules	• Rules	• Rules	• Rules*	• Rules
	• Policy Documents			•	
	•	• Equipment Descriptions		•	
• Conditions	• Conditions	• Conditions	• Conditions	• Conditions*	• Conditions
•	•	•	•	• Sample Evaluation	• Sample Evaluation

Harmonizing chapters across modules

Overall Progress

Commitment

- Drafts by third quarter
- Overview sections
- Five equipment chapters:
 - ✓ Abrasive Blasting
 - ✓ Dry Cleaners
 - ✓ Emergency IC Engines
 - ✓ Gasoline Refueling
 - ✓ Spray Booths

Stretch Goals

- Additional chapters:
 - Storage Tanks
 - Metal Melting Equipment
 - Baghouses / PM Control
 - Non Emergency Engines
 - Boilers / Process Heaters
 - Bulk Loading/Unloading Racks

Continuing to evaluate additional candidate chapters

The slide features a dark blue background with a diagonal gradient of lighter blue on the left side. A decorative border of horizontal lines runs diagonally across the page. The text "Public Comment" is centered in white.

Public Comment