



**PERMIT STREAMLINING
TASK FORCE
SUBCOMMITTEE
MEETING
December 14, 2022**



Permit Streamlining Task Force Subcommittee

December 14, 2022

Agenda



Staffing and
Organizational
Update



Application
Inventory
Update



Online Filing
Update



Other Business
and Public
Comment

Staffing and Organizational Update

Resource Update

2022 Recruitment

- Recruited 14 new Air Quality Engineers (AQE) (onboarding Q 2/3 2022)
- AQE recruitment initiated (onboarding Q4 2022)
- 5 promotions; 13 retirements; 4 separations
- Continuing assessment of staffing needs
- 2 supervisor positions approved in latest budget

Staffing Update

- 12 new Air Quality Engineers (onboarded Q3)
- Anticipate onboarding more AQEs in Q1 2023
- 11 promotions
- Mid-year additions – 8 positions
- Current promotional efforts

Updated Organizational Chart



Reorganization

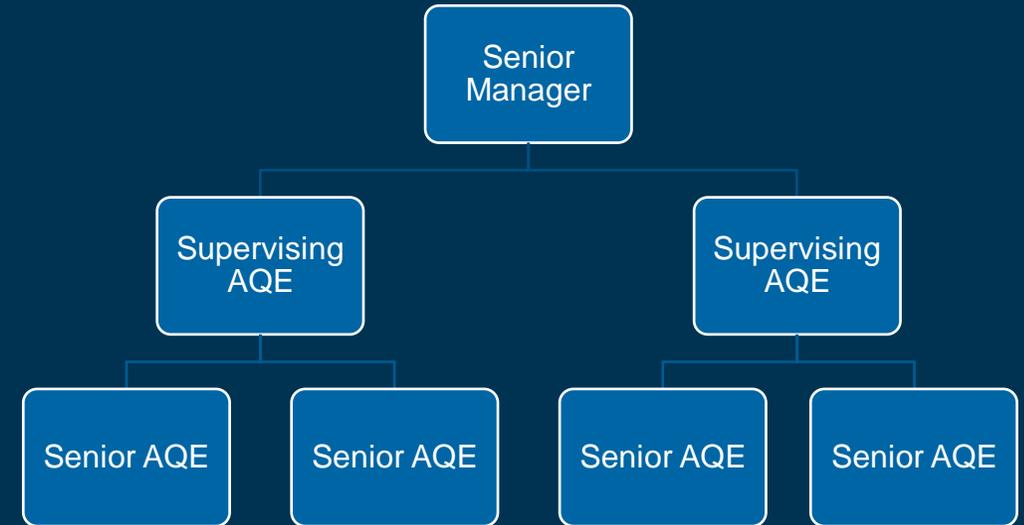
- Analysis of workflow and review backlogs
 - Rebalancing of workloads
 - Strategic staff additions based on dashboard data
- Coatings
 - Additional line and supervisory staff
- Waste Management
 - Redistributed workload
 - Additional supervisory staff
- Refinery Team
 - Additional supervisory staff



Reorganization Strategy

- 3 permitting teams changing structure
 - 2 Supervising AQEs - 4 Senior AQEs
 - Allows for operational flexibility within teams
- New Special Projects team
- Succession planning
- Filling of new vacancies in progress

- Reorganization was effective November 28, 2022



New - Special Projects Team

- Focus on reducing permit application inventory
 - Aged permit applications
 - Title V renewals
 - Provide processing and review support
 - Manage workloads of retirees and contractors



COVID-19 Impact Update

- October 2022 – Implemented new teleworking policy
- Extended teleworking
 - Committed to operational goals
 - Office presence
- Hybrid meetings
- CPP – Conducted November 17, 2022 (regular schedule June 2023)



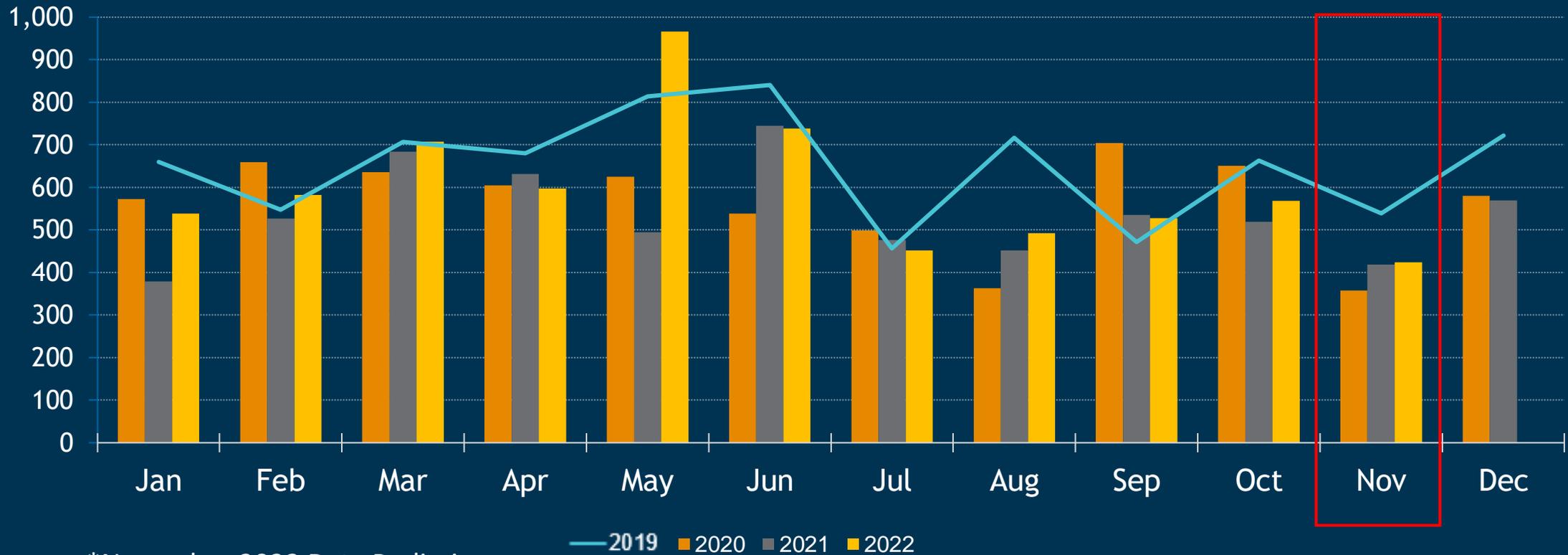
Comments

Staffing and Organizational Update

Application Inventory Update

Permit Application Activity

Number of Applications Received per Month

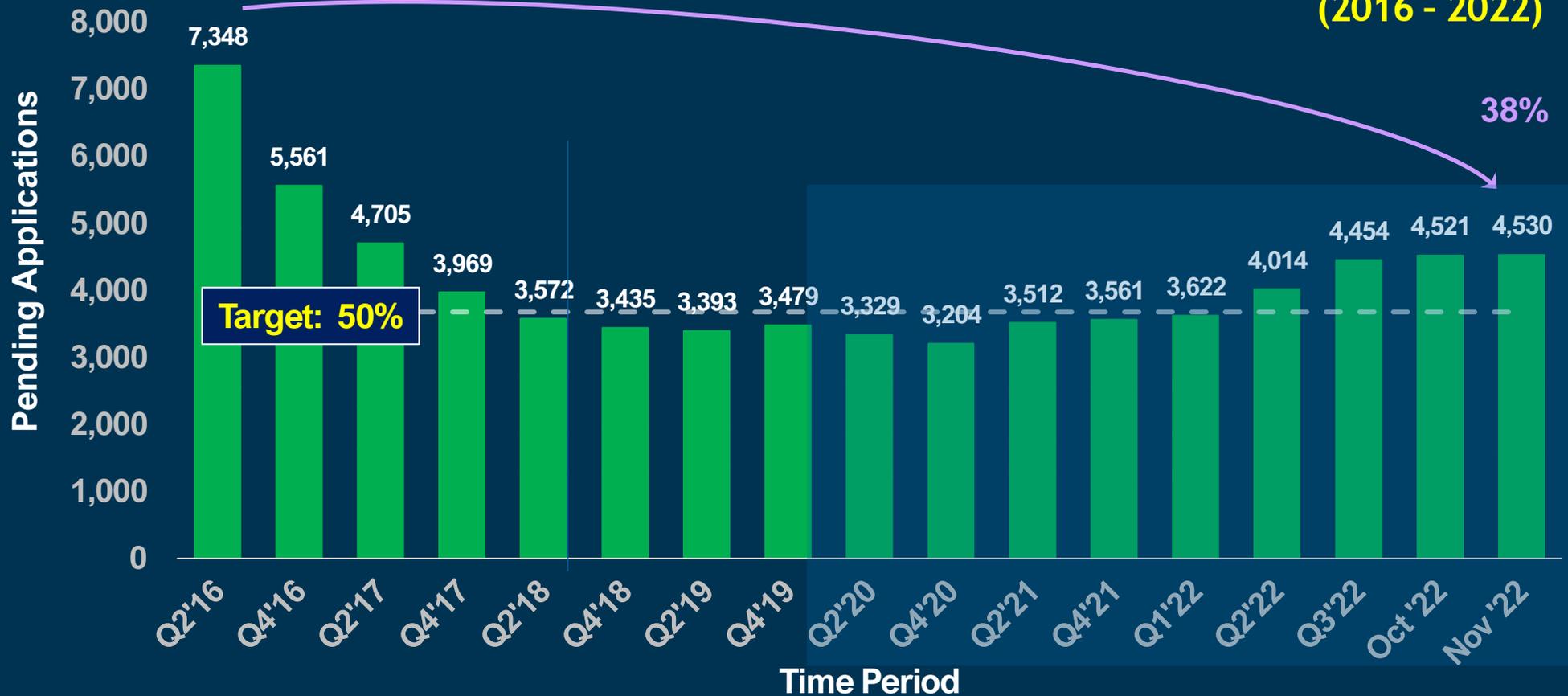


*November 2022 Data Preliminary

Permit Processing

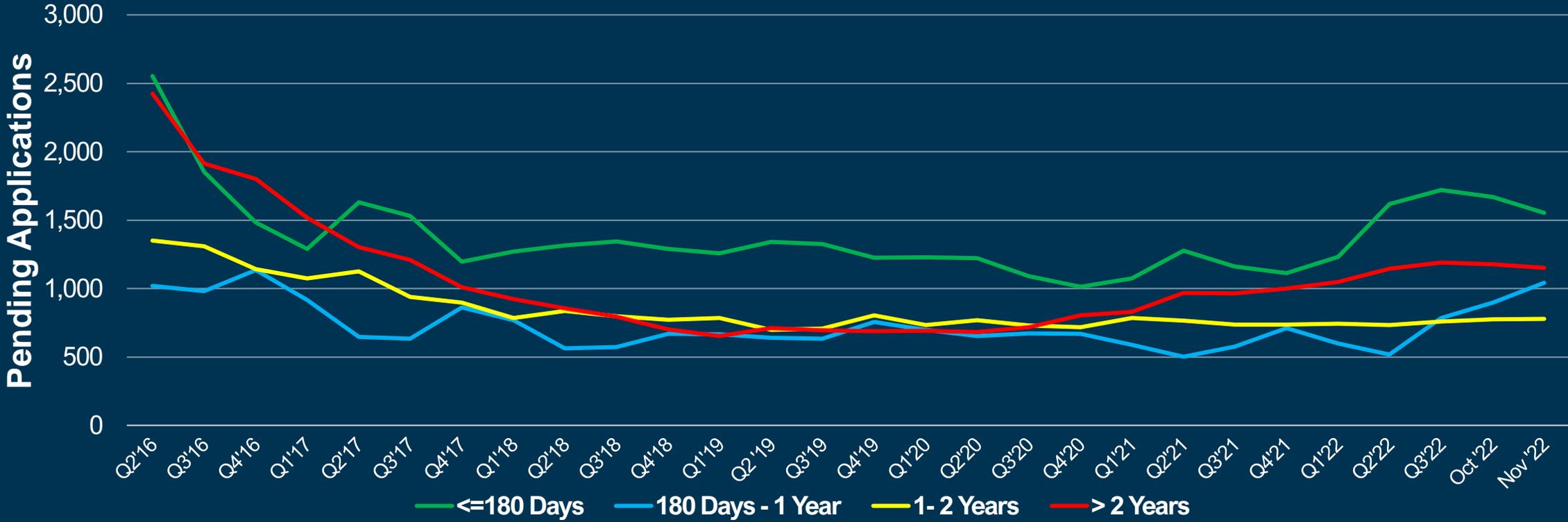
2016 Inventory Reduction Initiative

Pending Applications (2016 - 2022)



- Pandemic trends and staff turnover continue to present challenges
- Observed significant increase in incoming applications - signaling transition out of pandemic

Total Pending Applications (2016-2022)



Rule 1109.1 - Current Implementation Status

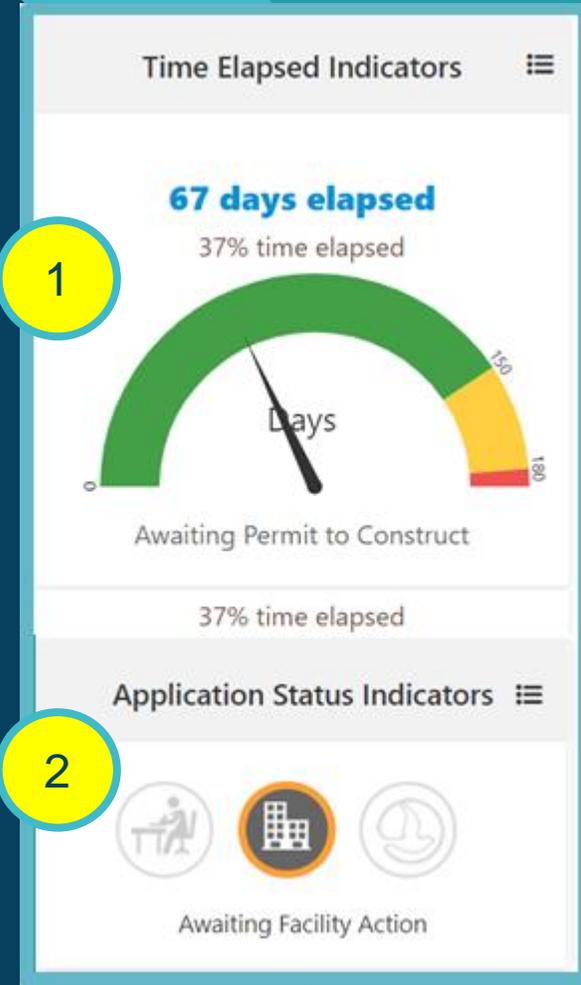
- First report - Stationary Source Committee (SSC)
October 21, 2022
- Quarterly updates
 - Next update SSC February 2023
- 72 applications received, Year-to-date
- Nearing completion of plan applications
 - Next step U.S. EPA review



Pending Permit Application Status Dashboard Update

Dashboard Status Indicators

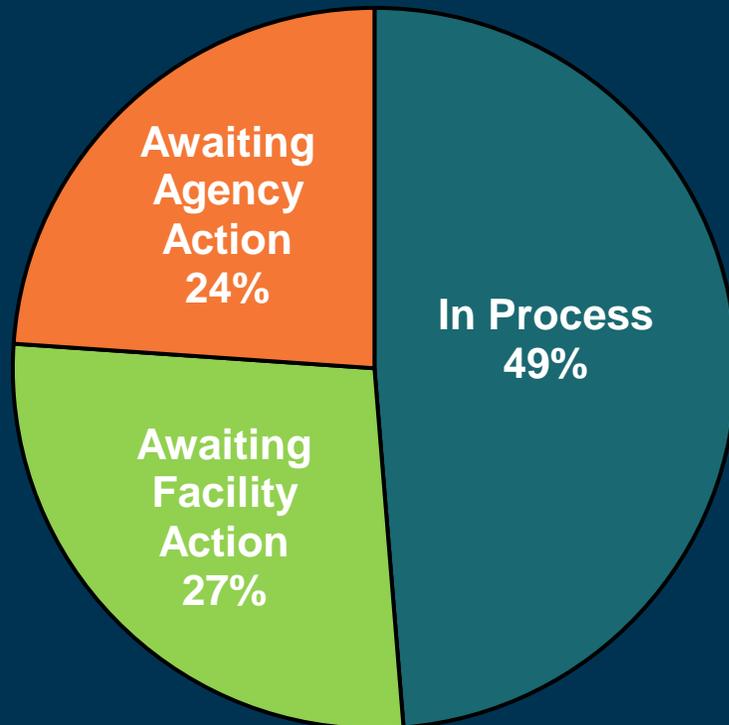
- Two status indicator types:
 1. Time elapsed indicator
 2. Application status indicators
- Application status indicators:
 1. In process
 2. Awaiting agency action
 3. Awaiting facility action



Pending Permit Application Status Dashboard

Efforts to Remove Bottlenecks

October 2019



- Initial snapshot showed roughly half of the working inventory applications were awaiting action
- Removing bottlenecks in the process should address systemic delays in processing
- Actions in progress based on June 2022 data presented to PSTF
 - Supervisor Review
 - Source Test Review

Dashboard Pending Action Trends



Application Inventory Summary

- Observed recent levelling of inventory growth
 - March 2022 retirements
 - May 2022 historic incoming application submittals
 - Continue to watch trends
- 29 promotions, WOC assignments, and new hires since June 2022
 - Approximately 20% of E&P staffing
- Strategic recruitment process
 - Expediting promotions and onboarding
- Planning for next wave of retirements March 2023
- Continue efforts to meet Permit Inventory Goals and Objectives

Comments

Application Inventory Update

Online Filing Update

Online Rule 222 Registration

■ New Modules Released:

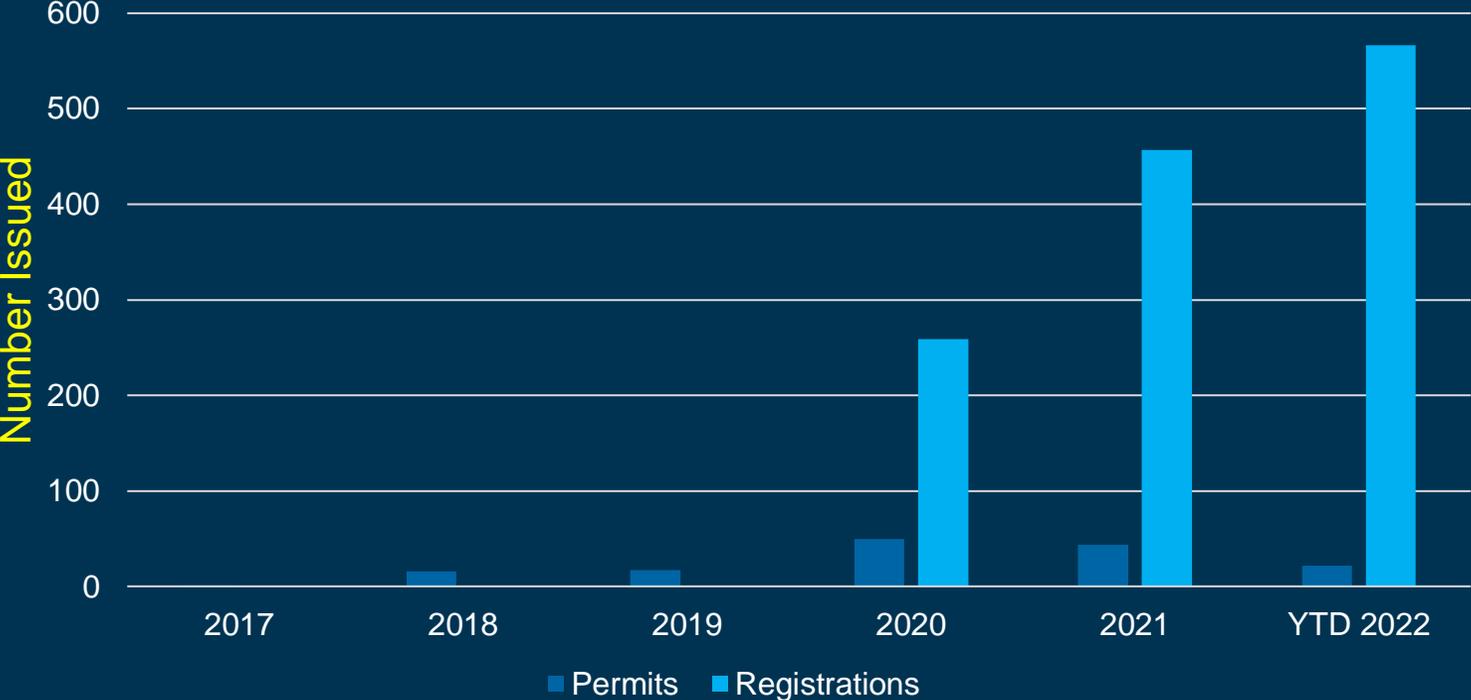
- 222-FO, Food Oven
- 222-OS, Storage of Odorants
- 222-U, Equipment Used to Store Aqueous Urea Solutions
- 222-AT, Asphalt Day Tanker
- 222-AH, Asphalt Pavement Heater
- 222-DB, Diesel Fueled Boiler
- 222-MT, Micro-Turbines
- 222-PH, Portable Diesel Fueled Heater

■ Previously Released Modules:

- 222-A, Negative Air Machines (Asbestos)
- 222-B, Boilers (1-2 mmBtu/hr)
- 222-C, Commercial Charbroilers
- 222-CT, Cooling Towers
- 222-TP, Tar Pots
- 222-PW, Pressure Washers

Online Filing Activity

Online Filing Completions



■ Q4 Updates

- Eight additional Rule 222 modules
- Registered Emergency Engine Permit module

Development

- Source Test Tracking Portal
 - Ongoing testing by multiple divisions
 - Submission and routing of source tests and protocols
 - Additional updates to portal to address resource constraints
- Clean Air Support System (CLASS) Migration Project
 - CLASS includes permit processing platforms
 - Platform modernization
 - Multi-year, multi-divisional effort
 - Incorporate workflow project findings (“to-be” process mapping)

Online Filing Update

Registration Permit - Emergency Engines

Registration Permit

Background - Emergency Internal Combustion Engine

- Registration permits are available for engines that have been previously issued a Certified Equipment Permit (CEP)
- Registration permits are evaluated through a streamlined process with a reduced application fee (50% lower)
- To qualify for online permit issuance, the proposed installation must:
 - Have been previously issued a CEP (including with pollution control, if applicable)
 - Be located more than 1,000 feet of a school (K-12)
 - Not be subject to Title V or RECLAIM
 - If diesel, be less than 175 bhp rating



Online Filing Update



Online Application Filing - EICE-RE Equipment Confirmation

Hide Tooltip

EICE - Emergency Electrical Generator - Certified Equipment

As part of the South Coast AQMD's permit streamlining program, certain emergency generators have been pre-certified as meeting South Coast AQMD rules/regulations. Facilities that want to install/operate these pre-certified units can apply for a permit using the permit "registration" program that offers lower processing fees and shorter permit processing times.

For additional clarification, please contact: onlinepermits@aqmd.gov.

Please review the questions below and click the yes/no button, to verify if your Emergency Internal Combustion Engine (EICE-RE) Equipment meets the criteria for being permitted online using the EICE-RE form.

- Yes Is this a natural gas, liquified petroleum gas (LPG) or other clean fuel powered certified generator, or have you considered using a clean fuel powered certified generator but determined that state or local requirements limit or prohibit installation due to safety or other health concerns?
- Yes Has this engine been pre-certified by the South Coast AQMD?
- Yes Is this engine to be located more than 1,000 feet from the outer boundary of a school (grades K-12)?
- No Does this engine have an add-on control device?
- Yes Is this engine to be located less than 164 feet from a sensitive receptor?
- No Is this a diesel-fueled engine?

Screening questions prior to using module

Continue >

Registration Permit - Emergency Engine

South Coast AQMD

Dashboard New Application My Account Preferences

Online Application Filing - Equipment Selection

Select Facility

Choose the reason for application filing.

- Dry-Cleaning Equipment
- Emergency Internal Combustion Engine, Registration
- Fuel Dispense And Storage Equipment
- Spray Booth - Automotive Refinishing Facility
- Rule 222 Application Filing

- Module completed final internal testing
- Additional thresholds in module for filing online
- All general forms are completed online:
 - 400-A
 - 400-PS
 - 400-CEQA
 - EICE-RE

South Coast AQMD

Dashboard New Application My Account Preferences

Online Application Filing - Emergency Internal Combustion Engine, Registration

Form 400-A Form 400-PS Form 400-CEQA Form EICE Supplemental Documents Payment Form EICE Review Submission

Online Filing Update

The screenshot shows the 'Online Application Filing - EICE-RE - Emergency Internal Combustion Engine, Registration' page. At the top, there is a navigation bar with 'Dashboard', 'New Application', 'My Account', and 'Preferences'. A 'Logout' button is visible in the top right corner. Below the navigation bar is a progress indicator with seven steps: 'Form 400-A', 'Form 400-PS', 'Form 400-CEQA', 'Form EICE', 'Supplemental Documents', 'Payment', 'Form EICE Review', and 'Submission'. The 'Form EICE' step is currently active and highlighted in orange. The main content area is titled 'Form 400-EICE > Facility :'. It includes an 'Application No:' field and a 'Status: Created' button. On the left, there is a sidebar with 'Equipment Information' selected, and 'Operating Schedule' and 'Summary' options. The 'Equipment Details' section contains several required fields: 'Certified Equipment Permit Number(Application Number)', 'Engine Manufacturer', 'Engine Maximum Rating in BHP(Stand-By)', 'Fuel Type', 'Engine Model Number', and 'Engine Model Year (Mfg)'. A 'Previous' button and a 'Cancel' button are located at the bottom of the form.

- Identify the certified equipment permit number
- Identify the Engine Model Year
- Application number of certified engines are on the [aqmd.gov](http://www.aqmd.gov) website:

<http://www.aqmd.gov/home/permits/equipment-registration>

<http://www.aqmd.gov/docs/default-source/permitting/certified-ice/certified-ice-list.xlsx?sfvrsn=28>

Online Payment



South Coast AQMD Online Payment

[Online Invoice Payment >>>](#) **Payment Method**

Please select the payment method you would like to use and click "**Next**" to proceed with Checkout.

Please note:

- For credit card payments, a convenience fee will be added at the time of payment. The convenience fee is not retained by South Coast AQMD.
- South Coast AQMD is only able to process US based credit cards at this time. We're sorry about the inconvenience.

Select a Payment Method:

- Credit card** (convenience fee will be charged)
- E-Check / Checking or savings account** (no charge)

Next >>>

- Third party payment portal
- Payment online via credit card or e-check
- Credit card payment includes convenience fee due to provider

Registration Permit

Evaluation Steps

- The Certified Equipment Permit is evaluated for compliance with all applicable rules
- Compliance with some rules under registration is demonstrated by meeting the screening criteria
- Completeness is met through final payment and attestation of the submittal by the applicant

Rules evaluated for compliance demonstration include:

- R212
- R401
- R402
- R404
- R431.1
- R431.2
- R1110.2
- Reg XIII
- R1303(a)
- R1303(b)(1)
- R1303(b)(2)
- R1401
- R1470
- R1472

Registration Permit Evaluation Screen

Online Application Filing - EICE - Emergency Internal Combustion Engine, Registration

Form 400-A Form 400-PS Form 400-CEGA Form EICE Supplemental Documents Payment Form EICE Review Submission

Form 400-EICE > Facility

Application No: Status: Rule Passed

Rule Evaluation

Emission Calculation

Permit Preview

Click on each rule to see the details.

- ✓ Rule: 212(c)(1) In Compliance
- ✓ Rule: 212(c)(2) In Compliance
- ✓ Rule: 212(c)(3) In Compliance
- ✓ Rule: 401 In Compliance
- ✓ Rule: 402 In Compliance
- ✓ Rule: 404 In Compliance
- ✓ Rule: 431.1 In Compliance
- ✓ Rule: 1110(2) In Compliance
- ✓ Rule: RegXIII In Compliance
- ✓ Rule: 1303(a) In Compliance
- ✓ Rule: 1303(b)(1) In Compliance
- ✓ Rule: 1303(b)(2) In Compliance
- ✓ Rule: 1401 In Compliance

- Rule compliance noted
- If compliance not verified online, application to be brought in-house and assigned to a staff engineer

Registration Permit Permit Preview

Form 400-EICE > Facility :

Application No: Status: Rule Passed [Show/Hide Instructions](#)

- ✔ Rule Evaluation
- ✔ Emission Calculation
- ✔ Permit Preview

Please review carefully
Revisions to either Equipment Description or Permit Conditions require submission of a new approval.

EQUIPMENT DESCRIPTION

Internal Combustion Engine, Generac, 6 Cylinder, Naturally Aspirated, Model 4.3LNGNA, 62.3 BHP, Natural Gas and/orLPG Fueled, with a Three Way Catalytic Converter and an Air/Fuel Ratio Controller, Driving an Emergency Electrical Generator.

PERMIT CONDITIONS:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. An operational non-resettable totalizing timer shall be installed and maintained to indicate the engine elapsed operating time.
4. This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year for maintenance and testing purposes and 4.2 hours in any one month for maintenance and testing purposes.
5. The operator shall keep a log of engine operations documenting the total time the engine is operated each month and specific reason for operation as:
 - A. Emergency use.

If compliance is verified online a draft permit is available for preview

Package Generation and Submittal

Online Application Filing - Emergency Internal Combustion Engine, Registration

Form 400-A ✓ Form 400-PS ✓ Form 400-CEQA ✓ Form EICE ✓ Supplemental Documents ✓ Payment ✓ Form EICE Review ✓ Submission ⚠

submittal, including associated fees. Make any necessary changes prior to generating the application package by clicking on the applicable form from and saving any changes before reviewing this screen again prior to proceeding to package generation and submittal.

The system may take a few moments to complete the process. We appreciate your patience.
Online application tool support: onlinepermits@aqmd.gov.

Submit Application

400-A	Not Generated
400-PS	Not Generated
400-CEQA	Not Generated
EICE	Not Generated

[Previous](#) [Cancel](#) [Generate Application Package](#)

Applicant must complete the final steps to submit:

1. Generate package*
2. Attest to final form submittal
3. Submit

* Once generated no further changes can be made to the application

Package Generation and Submittal (cont.)

South Coast Air Quality Management District

13. What type of business is being conducted at this equipment location?: Testing Facility
14. What is your business primary NAICS Code? (North American Industrial Classification System): 111110
15. Are there other facilities in the South Coast AQMD jurisdiction operated by the same operator?: No
16. Are there any schools (K-12) within 1000 feet of the facility property line?: No
Section F - Authorization I hereby certify that all information herein and information submitted with this application are true and correct.
17. Do you wish to review the permit prior to issuance?: No
18. Do you claim confidentiality of data?: No

Page 1 of 1

I agree that I have read the document

Applicant must read and attest each page of the online forms in the generated package in order to finalize the submittal

Package Generation and Submittal (cont.)

South Coast Air Quality Management District Welcome,

I certify that by signing and submitting this agreement, I have read, understand, and accept the terms and conditions of the electronic signature agreement.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this report and I believe that the information is accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

I understand and agree that I will be held as legally bound, obligated, or responsible by my use of my electronic signature as I would be using my hand-written signature, and that legal action can be taken against me based on my use of my electronic signature in knowingly submitting false information in an electronic document to the SCAQMD Electronic Reporting System.

I agree that I have read the statement

Submission

In order to submit the report, please ensure that you have checked all the checkboxes

[Submit Report](#)

Applicant must read and attest each page of the online forms in the generated package in order to finalize the submittal

Package Generation and Submittal (cont.)

The South Coast Air Quality Management District has received your on-line submission (Application #557417) for a permit to construct/operate a Emergency Internal Combustion Engine, Registration

This email confirms that your online application process is complete.

If the online system had indicated that your application was evaluated as "In Compliance" with all applicable rules, your permit will be sent in a separate email shortly. If you do not receive an email w

If the online system had indicated that your application could not be verified as compliant, a permit cannot be issued online. In this case, a South Coast AQMD engineer will review your online submi your application.

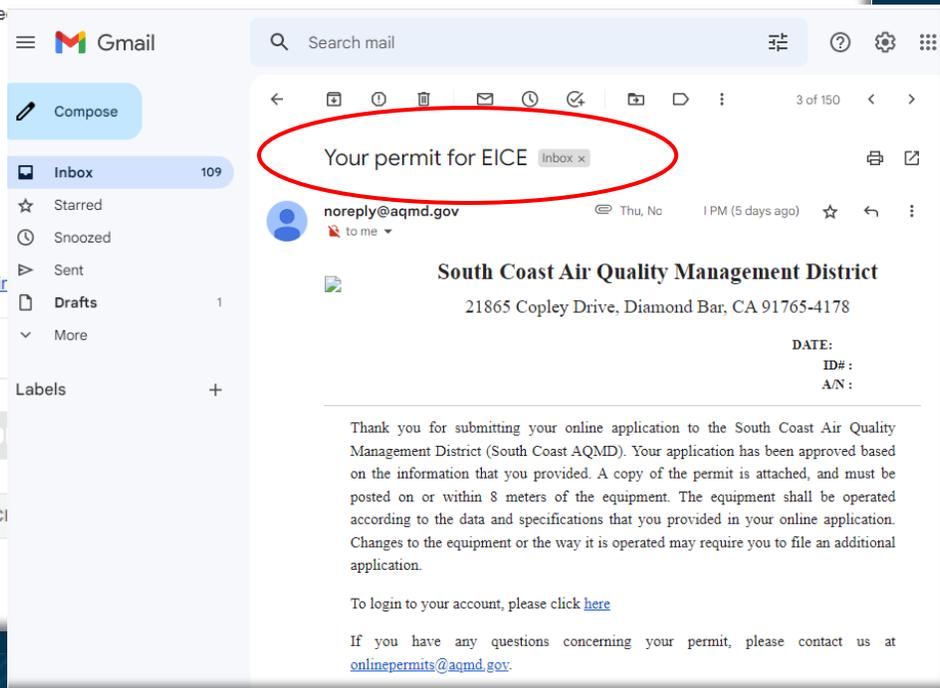
The following documents are based on the information you provided, and are attache

1. Form 400-A Application Form for Permit or Plan Approval
2. Form 400-PS Plot Plan and Stack Information Form
3. Form 400-CEQA California Environmental Quality Act (CEQA) Applicability
4. Form EICE Emergency Internal Combustion Engine, Registration

To login to your account, please click [here](#)

If you have any questions related to your online application, please contact us at [onlin](#)

4 Attachments • Scanned by Gmail



If compliance verified online, an email with the attested forms is sent to the applicant, followed by an email with the issued permit.

Registration Permit - Go Live

- Seeking interested parties for live application submittal
- Coordination between registration permit and non-registration permitting teams
- Non-qualified registration permit applications will have fees due and may need additional information to validate submittal
- Non-qualified registration permit applications would be eligible for XPP processing

Comments

Online Filing Update

Other Business

Comments

Other Business



Public Comment