South Coast Air Quality Management District

Permit Streamlining Task Force Sub-Committee Meeting

April 13, 2007

10:00-11:00 p.m.

Conference Room CC8

Agenda

- Call to Order/Opening Remarks
- Summary of Previous Streamlining Recommendations
- Additional Permit Streamlining Suggestions/Recommendations
- Defining AQMD's Workload and Backlog
- Permit Workload Status Update
- Next Meeting Schedule
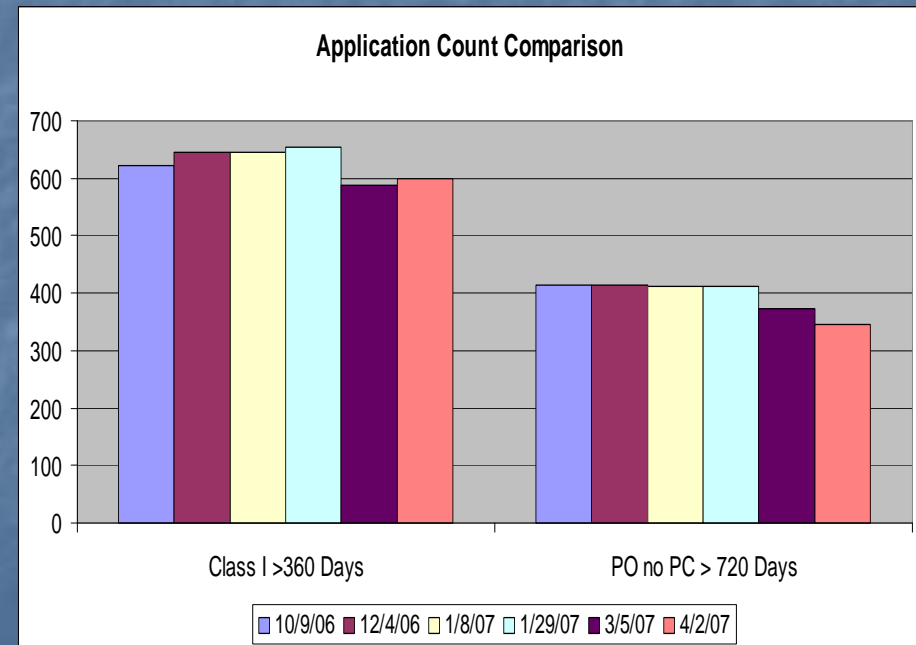
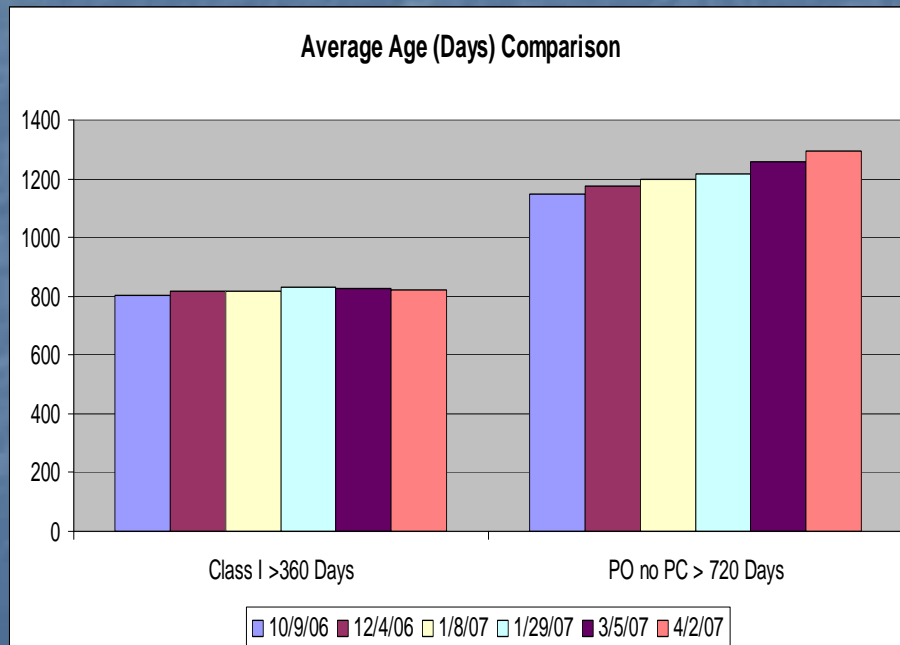# Past Permit Streamlining Recommendations

- Total of 37 recommendations in Areas Related to:
  - Reducing Steps Required to Issue Permits
  - Improving Communications Internally & Externally
  - Optimizing Permit Structure & Systems
  - Enhancing Management & Organizational Effectiveness.

Further Efforts Undertaken by PSTF

- Conducted 2 permit processing walkthroughs
- Conducted a case study to brainstorm potential causes of delays in permits
- Formed a PSTF subcommittee to discus permit streamlining options in more detail, examine various ideas and provide recommendations
- Had 1 meeting in 2007, 6 meetings in 2006 and 4 in 2005 to evaluate and develop Permit Streamlining recommendations.

Additional Permit Streamlining Recommendations

- Develop aged application reports for use by management to process applications in a more timely manner

Average Age (Days) Comparison

Legend: 10/9/06, 12/4/06, 1/8/07, 1/29/07, 3/5/07, 4/2/07

Categories: Class I >360 Days, PO no PC > 720 Days

Application Count Comparison

Legend: 10/9/06, 12/4/06, 1/8/07, 1/29/07, 3/5/07, 4/2/07

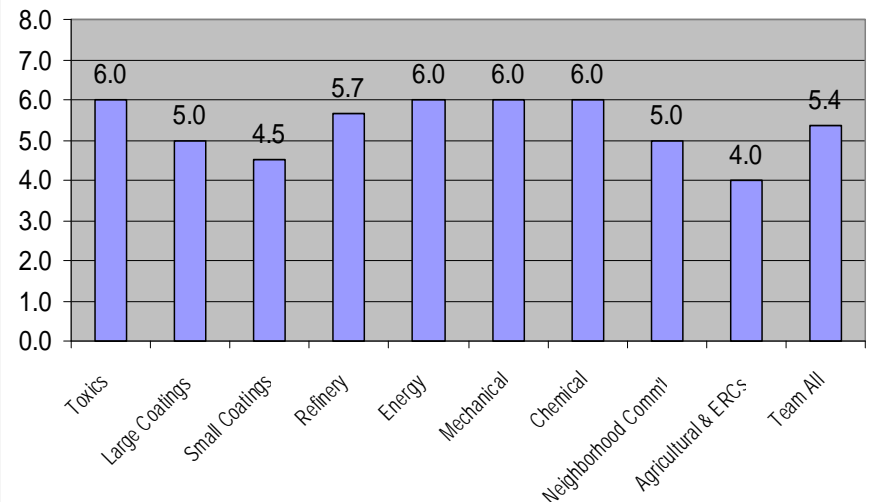Categories: Class I >360 Days, PO no PC > 720 Days

Additional Permit Streamlining Recommendations

- Manager and staff reassignments to balance staffing and improve performance

Previous Permit Engr to Senior Engr Ratio

Category	Ratio
Toxics	7.0
Large Coatings	5.5
Small Coatings	4.0
Refinery/Energy	6.7
Mechanical	5.5
Chemical	7.0
Neighborhood Comm'l	5.0
Agricultural & ERCs	4.0
Team All	5.7
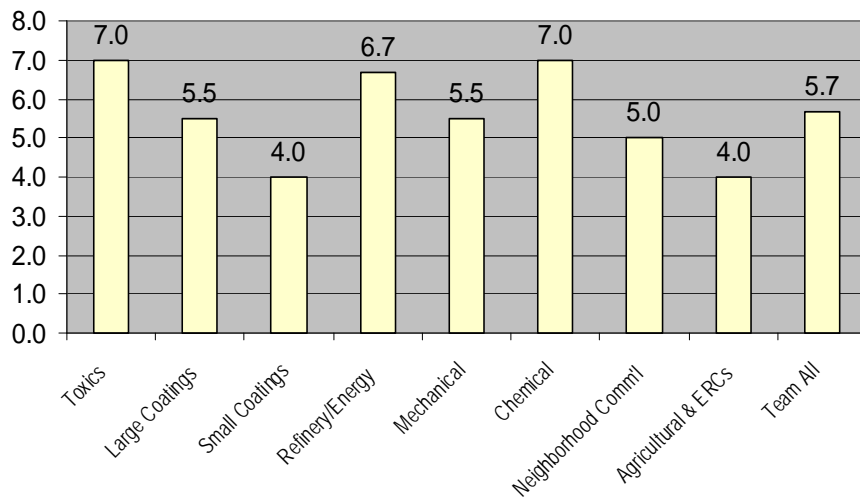
Current Permit Engr to Senior Engr Ratio

Category	Ratio
Toxics	6.0
Large Coatings	5.0
Small Coatings	4.5
Refinery	5.7
Energy	6.0
Mechanical	6.0
Chemical	6.0
Neighborhood Comm'l	5.0
Agricultural & ERCs	4.0
Team All	5.4

Additional Permit Streamlining Recommendations

- Workload reassignments to better balance applications distribution among permitting teams

Previous Average Workload/Engr

Team	Value
Toxics	90
Large Coatings	47
Small Coatings	48
Refinery/Energy	139
Mechanical	70
Chemical	145
Neighborhood Comm'l	104
Agricultural & ERCs	64
Team All	94

Current Average Workload/Engr

Team	Value
Toxics	97
Large Coatings	76
Small Coatings	67
Refinery	103
Energy	105
Mechanical	88
Chemical	116
Neighborhood Comm'l	104
Agricultural & ERCs	78
Team All	93
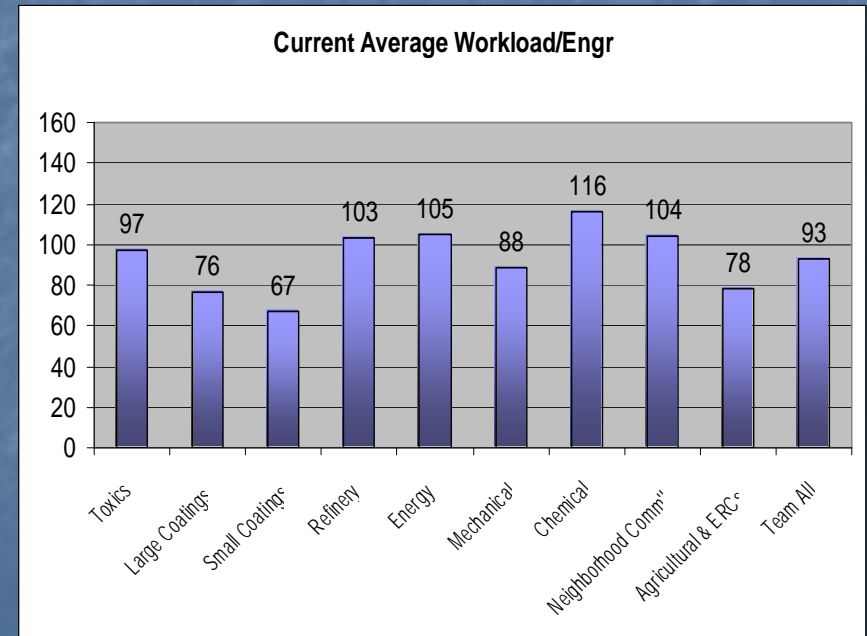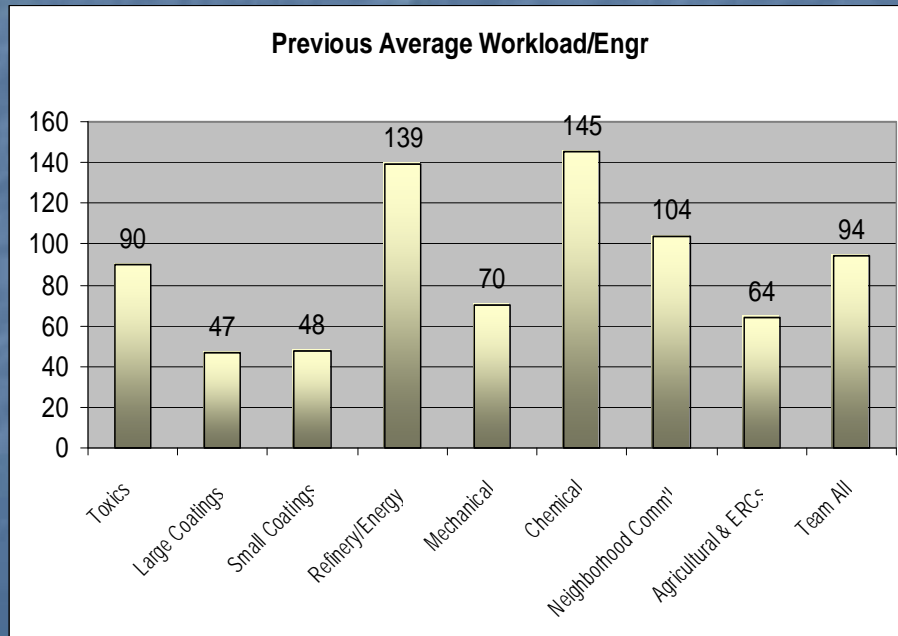
Additional Permit Streamlining Recommendations

- Consolidation of ERC applications processing in one team

- Development of a Fee Calculator and making it available on the web

- Hold regular (quarterly, semi-annual, and annual) meetings to discuss and update the status and progress in permitting

- Providing draft permits to applicants for review prior to release of proposed or final permits.

Additional Permit Streamlining Recommendations (cont'd)

- Prioritize processing of permits for installation of APC equipment

- Engineer positions funded by individual companies

- Update Title V Technical Guidance Document (TGD) and Frequently Asked Questions

- Change Title V thresholds

- Commit to process applications within 180 days and reduce backlog of application older than 180 days

- Hold regular meeting with large permit holders

- Update and improve AQMD's Permitting Website

- Establish a Permit Application Review Committee

Approved Expenditure of $2 Million for Permit Streamlining

AQMD Governing Board approved expenditure of $2 Million for permit streamlining on November 3, 2006 as follows:

- Staffing Enhancements/Augmentations $1,645,000

- Systems Enhancements & Staff Training $335,000

- Appropriated to FY 2006-07 Budget $865,000

Status of $2Million Expenditures

Permit Streamlining Measures	Status
Augmentation of staff •Permanent –Permit Streamlining (2 engineers) •Permanent – Information Management (1 System Analyst) •Temporary- Clerical (2 positions) •Temporary – Engineers (4 positions)	•Transfer completed (January 29, 07) •System Analyst hired (April 10, 2007) •Hired – reissued approx 3,000 permits for emergency ICEs •Four hired (two remaining)
Staff Training	•Completed for 9 new engineers hired •Completed for teams with reassigned workload
System Enhancements	
•Facility Permit Modification	•Created list of changes and system enhancement based on engineer's input •Consulted with BP and demo completed •Pending scoping meeting with IM
•NSR-Emission Inventory link	•Scoping meeting with IM completed
•NSR Bypass for Applications with no change in emissions	•Scoping meeting with IM completed
•Title V / Rule 212 Public Notice Tracking	•Title V tracking in final development stage Pending scoping meeting with IM on Rule 212 tracking

Status of $2Million Expenditures

Permit Streamlining Measures	Status
Application Forms Improvements	• Initial discussions held and work is ongoing
Improvements to Permitting Intranet	• Initial discussions held and work is ongoing
Updating Policy and Procedures	• 700 memos being re-indexed & updated • Updates will be available on-line and will be searchable by key words
Updating Permit Processing Templates	• List of 14 most frequently permitted equipment (i.e., IC engine, dry cleaner, oven and spray booth) identified for templates • Generic templates are under development

Proposed "Backlog" Definition

- **Class I Applications** – Permits to Construct (PC) New Construction/ Relocation, Modifications, and Change of Conditions with change in emissions
  - Major Sources (Title V and RECLAIM): > 180 days after deemed complete (> 210 days after submittal)
  - Non- Major Sources (w/o Public Notice): > 60 days after deemed complete   (> 90 days after submittal)
  - Non-Major Sources (w/ Public Notice): >180 days after deemed complete (>210 days after submittal)
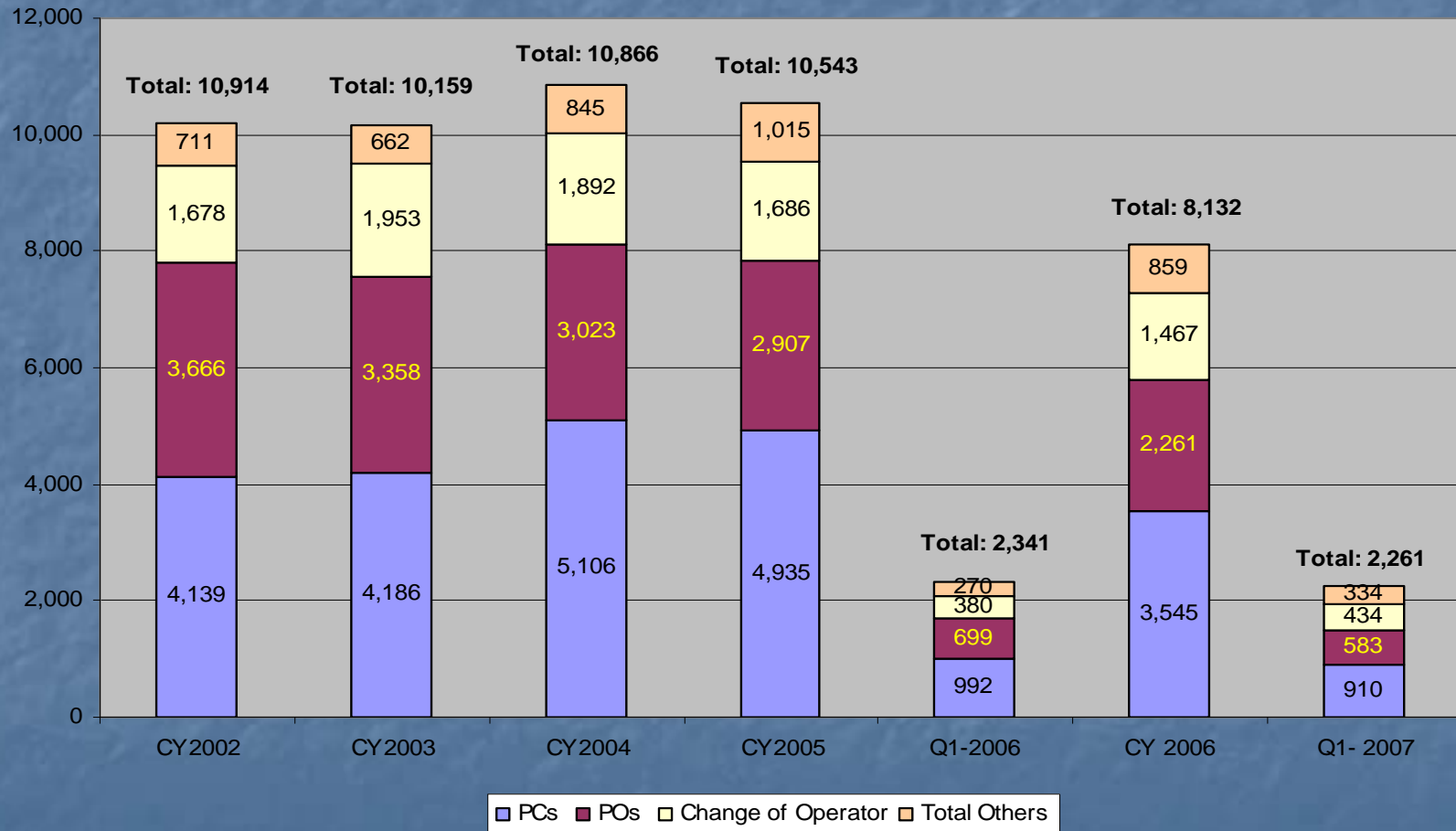
Proposed "Backlog" Definition
(cont'd)

- **Class III Applications -** Final Permit to Operate (PO) & Others
  - POs without prior PCs: > 180 days after deemed complete (>210 days after submittal)
  - POs with prior PCs: Is part of total workload but a lower priority and should not be classified as part of the backlog
    - These applications are for equipment that are either on hold, under construction or if completed, are awaiting source tests, etc., but operating legally under their permit to construct
  - Plans & ERCs: > 180 days after deemed complete (> 210 days after submittal)
  - Change of Condition & Admin Changes
    - Major Sources: > 180 days after deemed complete   (> 210 days after submittal)
    - Non-Major Sources: > 60 days after deemed complete (> 90 days after submittal)
  - Change of Operator
    - Major Sources: > 180 days after deemed complete (> 210 days after submittal)
    - Non-Major Sources: > 60 days after deemed complete (> 90 days after submittal

Application Processing Priority

- **High Priority :** a) Expedited Permit Applications (both for Permits and ERCs)
  b) Permit to Construct/Relocation/Modification> 180 Days old
      Subpriority 1: Air Pollution Control Equipment
      Subpriority 2: New Construction/Relocation
      Subpriority 3: Modification/Change of Condition
  c) POs no PCs>180 Days old
  d) ERCs

- **Medium Priority :** a) All other PCs/Relocations/Modifications/Change of
      Conditions
  b) All other POs no PCs
  c) Plans

- **Low Priority:** a) Change of Operators
  b) POs with prior PCs
  c) Administrative Changes

Permit Inventory Status - Applications Received

Permit Inventory Status – Applications Received

	CY 2002	CY 2003	CY 2004	CY 2005	Q1-2006	CY 2006	Q1-2007
Total Others	711	662	845	1,015	270	859	334
Change of Operator	1,678	1,953	1,892	1,686	380	1,467	434
POs	3,666	3,358	3,023	2,907	699	2,261	583
PCs	4,139	4,186	5,106	4,935	992	3,545	910
Total	**10,914**	**10,159**	**10,866**	**10,543**	**2,341**	**8,132**	**2,261**

Legend: ■ PCs ■ POs □ Change of Operator ■ Total Others

16

Permit Inventory Status - Applications Processed

Total: 13,615

CY 2002: 1,063 | 2,414 | 6,225 | 3,913

Total: 10,820

CY 2003: 641 | 1,761 | 5,112 | 3,306

Total: 10,603

CY 2004: 839 | 1,719 | 5,144 | 2,901

Total: 10,596

CY 2005: 488 | 1,589 | 5,569 | 2,950

Total: 2,324

Q1-2006: 257 | 314 | 1085 | 668

Total: 9,145

CY 2006: 927 | 1,452 | 3,826 | 2,940

Total: 2,417

Q1-2007: 299 | 408 | 966 | 744

Legend: PCs & PC-POs | POs | Change of Operator | Total Others

Permit Inventory Status - Applications Processed & Received

Chart legend: Total Applications Processed (light purple), Total Applications Received (dark red)

Month	Total Applications Processed	Total Applications Received
Jul-05	765	704
Aug-05	1054	1115
Sep-05	1067	884
Oct-05	888	603
Nov-05	646	666
Dec-05	711	625
Jan-06	819	761
Feb-06	698	771
Mar-06	807	809
Apr-06	604	560
May-06	983	769
Jun-06	705	955
Jul-06	780	488
Aug-06	747	571
Sep-06	818	680
Oct-06	782	773
Nov-06	642	518
Dec-06	760	477
Jan-07	738	754
Feb-07	823	659
Mar-07	856	848

Permit Inventory Status - Applications Pending

19
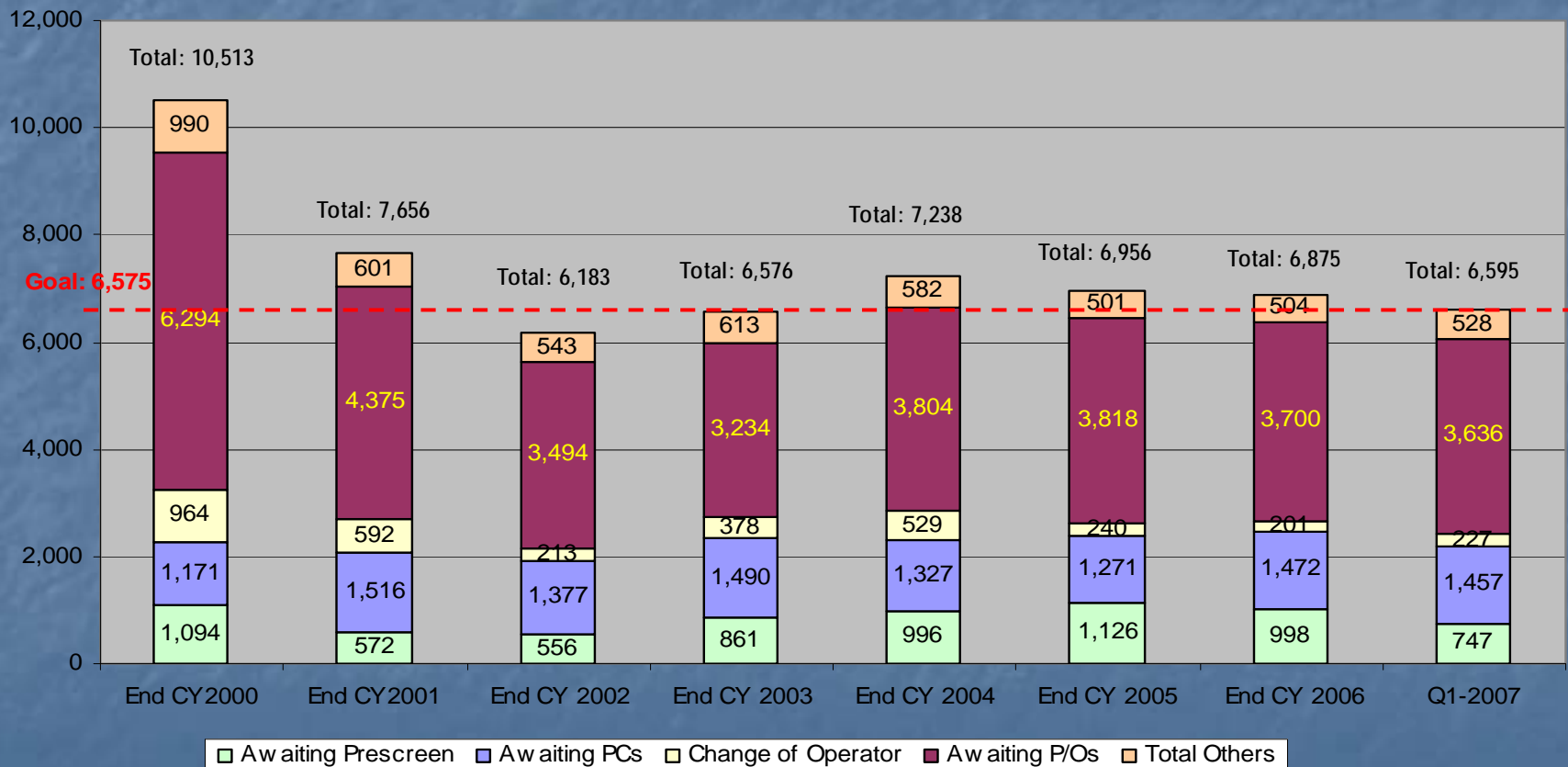
Total Workload and Proposed Backlog Status

Application Class	Source Type	Backlog	Total Pending	Total Inventory
Class I Major Sources > 210 Days	Major	590	817	817
Class I Non-Major Sources > 90 Days	Non-Major	446	692	692
PO without prior PCs > 210 Days	All	783	1141	1141
Plans > 210 Days	All	270	342	342
ERCs > 210 Days	All	63	87	87
PO with prior PCs > 210 Days	All			2256
Change of Conditions & Admin Change Major Source > 210 Days	Major	545	634	634
Change of Conditions & Admin Change Non-Major Source > 90 Days	Non-Major	267	372	372
Change of Operator Major Source > 210 Days	Major	197	262	262
Change of Operator Non-Major Source > 90 Days	Non-Major	56	149	149
Total		3217	4496	6752