



Permitting Working Group

Certified Permitting Professional (CPP) Program

April 23, 2025

Agenda / Discussion Topics

- CPP Program update
- Meeting objectives
- Discussion
 - CPP resources and access to resources
 - CPP submittal and review process
 - Other considerations
- Prioritization of recommendations / action items

CPP Program Update

- The Permitting Enhancement Program (PEP) initiative identified opportunities for CPP Program enhancements to improve efficiency, transparency, and program value
- The CPP Program was intended to:
 - Identify professionals:
 - Knowledgeable about South Coast AQMD standards and requirements
 - Capable of performing engineering evaluations
 - Result in more complete permit applications and reduced permit processing times
 - Aid applicants in recognizing compliance requirements and necessary permit conditions

Meeting Objectives

- Identify resources that would improve the CPP Program
- Identify changes to processes that would provide mutual benefits to CPPs, permitted facilities, and South Coast AQMD
 - Incentives:
 - Faster permit processing for high-quality submissions
 - Clear criteria and benefits for participating CPPs
 - Improved transparency:
 - Publicly available policies and guidelines
 - Program audit and resource impacts
- Prioritize improvement efforts
- Identify key deliverables

Discussion

Resources and Access to Resources

What resources or access to resources would aid CPPs in submitting?:

- Complete application package submittal
 - Cover all activities or actions that require an application submittal
 - Ensure all applications in package include appropriate fees
 - Ensure all applicable application forms are submitted
- Engineering evaluations that include, as applicable:
 - Regulatory evaluations
 - Emissions calculations
 - Risk assessments
 - Draft equipment descriptions
 - Draft conditions
 - Compliance and compliance assurance assessment

Discussion

Resources and Access to Resources - Examples

- CPP Manual*
- Guidance on permit unit boundaries
- Notification of rule updates
(available through <https://www.aqmd.gov/sign-up>)
- Online application submittal access/training
- Evaluation checklist*
- Current emission factors
- Facility emission data
- Example permits/conditions*
- Example evaluations*

* See also next slide



Discussion

Resources and Access to Resources - Potential Program Enhancements

- CPP Manual
 - Focus on permitting principles
 - Improve clarity and accessibility
 - Checklists for required evaluation components
 - Examples
 - Calculations
 - Equipment descriptions
 - Conditions
- Standardized checklists:
 - Application preparation
 - Pre-application meetings
- Permit condition library for CPPs
- Enhanced access to permits
(by equipment type)



Open Discussion

Discussion

Submittal and Review Process

What application process / review changes would be of benefit to the CPP Program?

- Minimize engineering staff review time for CPP applications
 - What level of staff engineering evaluation is needed for CPP submittals?
 - Can CPPs include all elements of a complete engineering evaluation?
 - Sending CPP apps directly to supervisor for review
- Holding pre-application conference
- Receiving staff feedback on submitted application deficiencies
- Other quality assurance opportunities:
 - CPP and “CPP+” (qualification determined by successful CPP application submittals)
 - CPP Specialization - based on industry focus, experience, application types, continuing education
- Handling CPP submittals separately
- CPP Ombudsperson – roles and responsibilities

Open Discussion

Discussion

Other Considerations

- Pilot program and prioritizing CPP submittals
- Cost recovery considerations
 - Quality CPP application submittals
 - Typically for more complex submittals
 - May also be time and material submittals
 - Potential fee comparison to expedited permit processing
 - Review after pilot project to quantify distribution of time
- Pre-requisites for taking CPP exam?

Open Discussion

Next Steps

- | | |
|---|-------------------|
| ■ Permit Streamlining Task Force Discussion | December 10, 2024 |
| ■ PEP Update to Governing Board | March 7, 2025 |
| ■ Permitting Working Group Discussion | April 23, 2025 |
| ■ Permit Streamlining Task Force Update | Q3 2025 |
| ■ PEP Update to Governing Board | Q3 / Q4 2025 |

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