DRAFT

APPENDIX A - CPP APPLICATION REVIEW CHECKLIST

CPP Application Review Checklist

General Information

Reviewing Engineer: type name here Date: date here

Supervisor Approval: name/date signifies approval Date: date here

Name of Facility: type name here FID: # here

Permit App Nos.: type here Application Date: date here

CPP Name / CPP#: type name./CPP ID CPP E-Mail: type here

CPP Phone Number: type here

Application Review Checklist

Review Items	Issues Found			NA
	Other	Minor	Major	
a. Application General Completeness				
b. Permit Form Completeness				
c. Fees Correctly Determined and Paid				
d. Plot Plan				☐
e. Location Description				
f. Flow Diagram				☐
g. Process Description				
h. Facility Background/History				☐
i. Emissions Calculations				
j. Description of Source of Offsets				☐
k. Regulation II and XIII Compliance Evaluation				
l. Other Rule Identification and Evaluation				
m. AQIA (completeness/files)				☐
n. Health Risk Assessment (completeness/files)				☐
o. Permit Conditions				
Total Issues				

NA – Not applicable for this CPP application.

Overall Grade

Grade based on Application Review Checklist and numerical grading system in instructions below, see 11 below.

Admin Issues/Resolution Notes

Item (x)
Describe each issue separately. If none note NA.

Minor Issues/Resolution Notes:

Item (x)
Describe each issue separately. If none note NA.

Description of Major Issues:

Item (x)
Describe each issue separately. If none note NA.

Additional Notes for the CPP:

Type here rationale for the grade and descriptions given above with the intent of giving feedback to improve future applications.

Additional Notes for the Senior Engineer:

Type here issues that may need additional review and decision from Senior Engineer or above.

Application Review Instructions:

1) Complete the general information section. Nothing should be missing here.
2) Complete the review checklist for the application package as submitted. Certain items may not be necessary based on the situation, such as plot plans, process flow diagrams, facility background/history descriptions, description of offsets, AQIAs, or HRAs.
3) Resolution of minor issues should be attempted with the CPP, and CPPs must be responsive.
4) The review of the process description should also include the determination of adequate engineering for the emissions source and controls.
5) The CPP Application Review only includes a completeness check, not accuracy reviews, for HRA and AQIAs. This completeness check identifies if the proper files (modeling input/output and associated calculation files) have been provided with the application, that any required modeling protocols were properly submitted and approved, and that the modeling methods and results have been completely reported.
6) Specific identical/similar issues found in multiple applications within a single application package are only counted as one issue. For example, if the emissions calculations have the same error over five similar permit units that is seen as one minor error.
7) Administrative/Other (Other) issues, which should be correctable in a timely manner and have little to no impact on application processing, i.e. doesn't require assigned engineer to correct, can include but are not limited to the following:
    a. Incorrect fee determination/payment when within 15 percent of the correct amount.
    b. Lack of proper signatures/dates on forms.
    c. Incorrect or unclear permit unit property addresses.
    d. Minor missing items on otherwise complete forms such as:
        i. Missing checkmarks on 400-CEQA.
        ii. One or two missing check marks or non-major inputs on other forms.
    e. Lack of submittal of original and editable files as follows:
        i. Emissions calculation files.
        ii. Full AERMOD or AERSCREEN input/output files if used for an AQIA or HRA.
        iii. Full HRA output files if the Risk Tool was used for an HRA.
        iv. Full Hotspots Analysis and Reporting Program (HARP) input/output files if used for an HRA.
    f. Not including changes to approved permit application methods or procedures that occurred after the preapplication meeting and/or that were not made public or provided to the CPP prior to filing of the permit application. This can include but is not limited to the following:
        i. Newly adopted emissions factors or calculation procedures.
        ii. Changes to risk assessment or AQIA methods or default inputs.
        iii. Changes to permit forms.
        iv. Additions or changes to standard permit conditions.
8) Minor issues, which can either be corrected by the CPP in a timely manner, or fixed by the reviewing engineer with minor effort, can include but are not limited to any of the following:
    a. Simple errors that can be easily corrected in the following:
        i. Emissions calculations
        ii. HRA inputs
    b. Incomplete or incorrect identification of nearest sensitive and worker receptor locations.
    c. Incomplete facility history, including recent NOC/NV status.
    d. Missing or incomplete process assumption data, including but not limited to:
        i. Missing or incomplete equipment properties.

ii. Missing or incomplete vendor data.
iii. Missing or unclear information on exhaust parameters, including exit locations.
iv. Missing or unclear equipment use or production values.
v. Missing or unclear equipment schedules.
vi. Missing Safety Data Sheets (SDS).

e. Missing or incomplete rule evaluation.

9) Major Issues, which result in considerable delays in processing or require additional clarification/information from the applicant prior to proceeding, can be any of the following:
   a. Missing form(s).
   b. Substantially incomplete form(s), three or more items are clearly missing.
   c. Missing any of the applicable review items in the checklist table.
   d. Substantially incomplete review items, that cannot be completed by South Coast AQMD staff.
   e. Substantial underpayment of fees (more than 15 percent).
   f. Failure to correctly determine applicability of any public notice requirement.
   g. Failure to provide the following when required: applicable source test data, certified CEQA document, and applicable PSD analysis.
   h. Knowingly including false information in the permit application.
10) The reviewing engineer has discretion on what they consider a minor or major issue, to obtain the primary goal of accelerating the permit review process. This sort of discretion could include:
   a. A form with many missing items, but those items are clearly provided elsewhere in the application package allowing complete technical review.
   b. Missing the AQIA or HRA modeling/calculation files, with an otherwise adequate discussion on the methods and results summary and obtaining the necessary files in a timely manner.
   c. Substantial underpayment of fees with timely submittal of remaining fees.
   d. Any other major deficiency that, after consultation with the CPP, can quickly be rectified by the CPP or with minor effort by the reviewing engineer.
11) Grading of the application shall be done using the following numeric grading system:

Grade	Rationale for Grade
5	No issues and can be passed directly to the senior engineer as a complete engineering evaluation.
4	Only administrative issues.
3	Less than 4 total minor issues combined in 3 or fewer review items.
2	4 or more and less than 8 minor issues combined in 5 or fewer review items.
1	8 or more total minor issues or 6 or more in separate review items.
0	One or more major issues that require that the permit application be removed from the CPP process or denied.

Several highly scored applications can result in the CPP being publicly recognized as a high performer. Several poorly scored applications may result in the loss of the CPP certification. A loss of CPP certification can be reattained through the normal CPP accreditation process.