Permit Streamlining Task Force (PSTF) Subcommittee

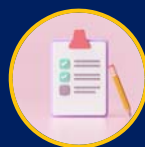**August 13, 2025**

Agenda

Permitting Advisory

General Permitting Update

Certified Permitting Professional Program

Task Force Member Discussion – Compliance Assurance

Other Business and Public Comment Period

Permitting Advisory
Gasoline Dispensing Facilities (GDF)

GDF Permitting Advisory

- State Water Resources Control Board permanent closure requirements of single-walled components – SB 445 signed into law in 2014
- Approximately 100 facilities need to meet requirements by December 31, 2025 deadline
  - South Coast AQMD permits are required prior to modifications
- Streamlined permitting for owners/operators of qualifying GDFs
- To qualify as administrative change:
  - Like-for-like replacement – identical tank configuration
  - No changes to other components, except for dispenser replacement without change in type, location, or number of fueling positions
  - No changes to throughput limits

GDF Permitting Advisory

- Advisory released June 25, 2025
- Submit complete permit application for administrative change by August 1, 2025
  - South Coast AQMD commits to acting on timely, complete applications by December 31, 2025
- Expedited Permit Processing may be available and should be requested upon application submittal – filing fee is additional 50%
- Requests beyond scope of this administrative change require a separate permit application and may take longer to process
- Currently: 44 applications with requests for equipment modification related to single walled components.

Permitting Advisory No. 2025-01

Comments

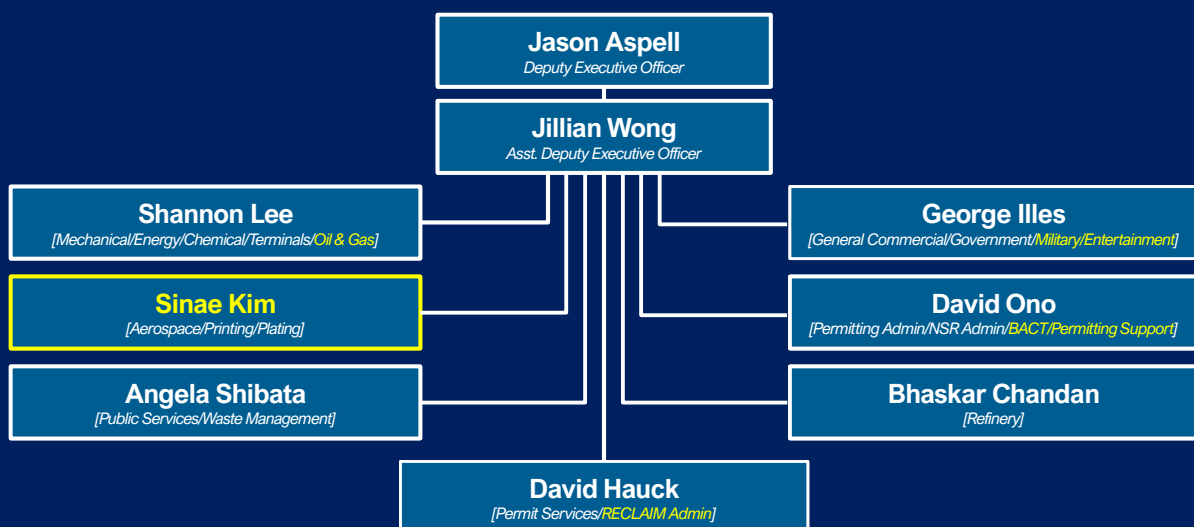**Permitting Advisory**

General Permitting Update

Updated Organizational Chart

Jason Aspell
Deputy Executive Officer

Jillian Wong
Asst. Deputy Executive Officer

Shannon Lee
[Mechanical/Energy/Chemical/Terminals/Oil & Gas]

George Illes
[General Commercial/Government/Military/Entertainment]

Sinae Kim
[Aerospace/Printing/Plating]

David Ono
[Permitting Admin/NSR Admin/BACT/Permitting Support]

Angela Shibata
[Public Services/Waste Management]

Bhaskar Chandan
[Refinery]

David Hauck
[Permit Services/RECLAIM Admin]

Recruitment Update
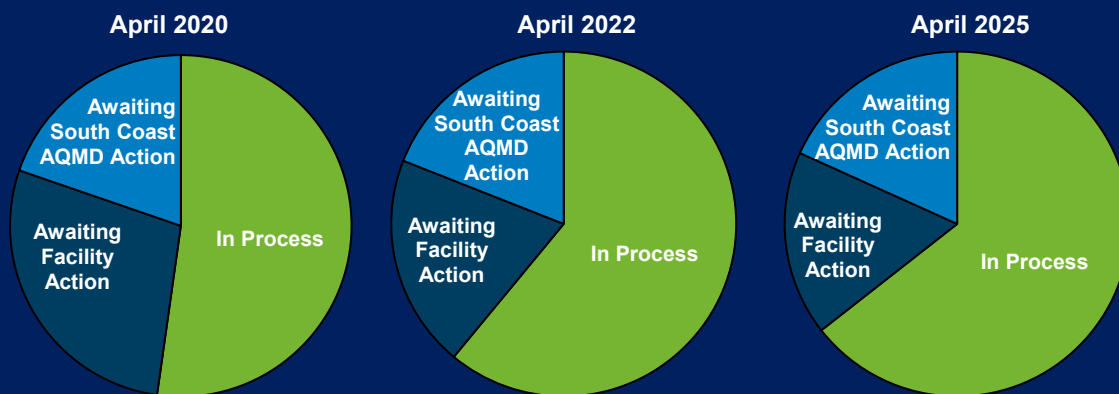
Peak 2023 E&P vacancy rate >20%

Prioritized staffing, PEP-Targeted vacancy rate for Engineering and Permitting is 10%

Achieved 10.2% vacancy rate in March 2025

Current 8.0% division-wide vacancy rate
Completed engineer recruitment in June 2025

Pending Permit Application Status Dashboard

April 2020

Awaiting South Coast AQMD Action

Awaiting Facility Action

In Process

April 2022

Awaiting South Coast AQMD Action

Awaiting Facility Action

In Process

April 2025

Awaiting South Coast AQMD Action

Awaiting Facility Action

In Process

Permit applications "In Process" have grown as aged applications are being worked on and as newer staff continue to gain experience

Update on Productivity Metrics

- **Fiscal Year (FY) 2023-24 Priority Objective and Goal of timely completions was replaced in FY 2024-25 to focus on increasing permitting production**
  - Met FY 2023-24 timely completion goal in each of the four reported quarters
  - FY 2024-25 goal to increase production by 500 completions over Calendar Year 2023
- **Monthly report to Stationary Source Committee (SSC)**
  - Provides information on permit application workflows
  - Renewed focus on monthly completions to:
    - Monitor new staff and new supervisory staff development
    - Track progress toward achieving pre-pandemic production levels

Pending Permit Application Status Dashboard
June 2025 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add'l Info. Req.	7% (10%)	Engineering Evaluation and Admin Processing	65% (51%)	Compliance	< 1% (1%)	**Supv/Mgr Review**	**11% (18%)**
Related App A/I	1%			Draft Permit Initial Review	<1% (2%)	Related App Proc.	1% (3%)
				Draft Permit Supplemental Review	<1%	**Source Test Review**	**1% (4%)**
						Policy Review	<1% (2%)
						Field Eval	< 1%
				Conduct Source Test	**1% (3%)**	Public Notice	< 1%
						Other Agency Rev.	1%
				Awaiting Constr.	6% (2%)		

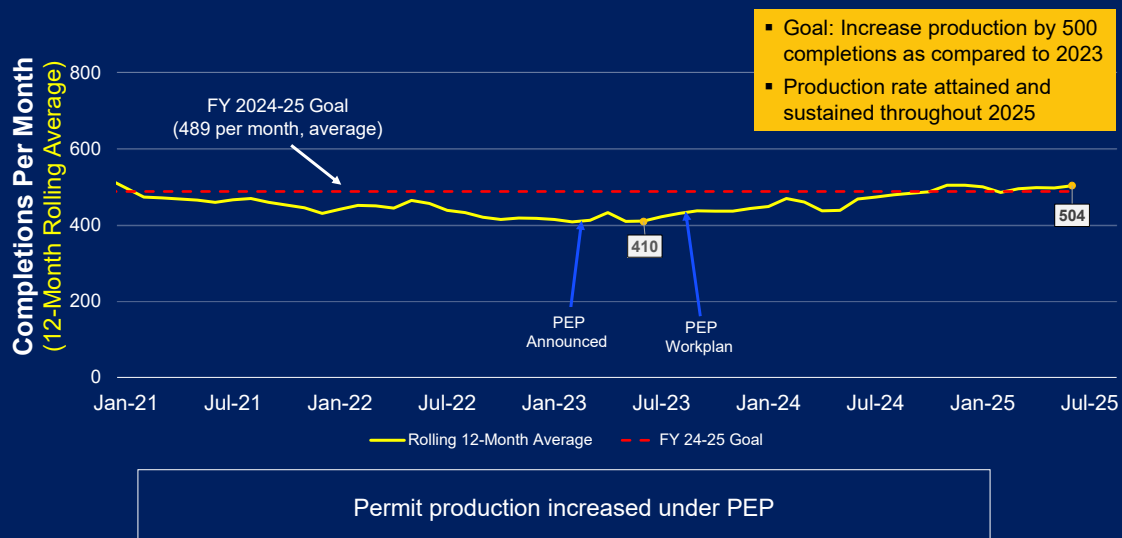Aged Applications (> 2 years) are shown in parentheses if different than overall snapshot

Supervisor/Manager Review

- **Increased actions on aged applications**
  - E&P initiated two focused aged application initiatives in last 10 months
  - Title V workplan in progress to address aged Title V renewals
- **Since June 2024, Supervisor/Manager Review (SMR) category decreased by 3% for all applications**
  - SMR increased 5% for aged applications – likely due to focused initiatives
- **SMR average of two permitting teams above average**
  - Average SMR for other five permitting teams is 7% (all applications) and 12% (aged)
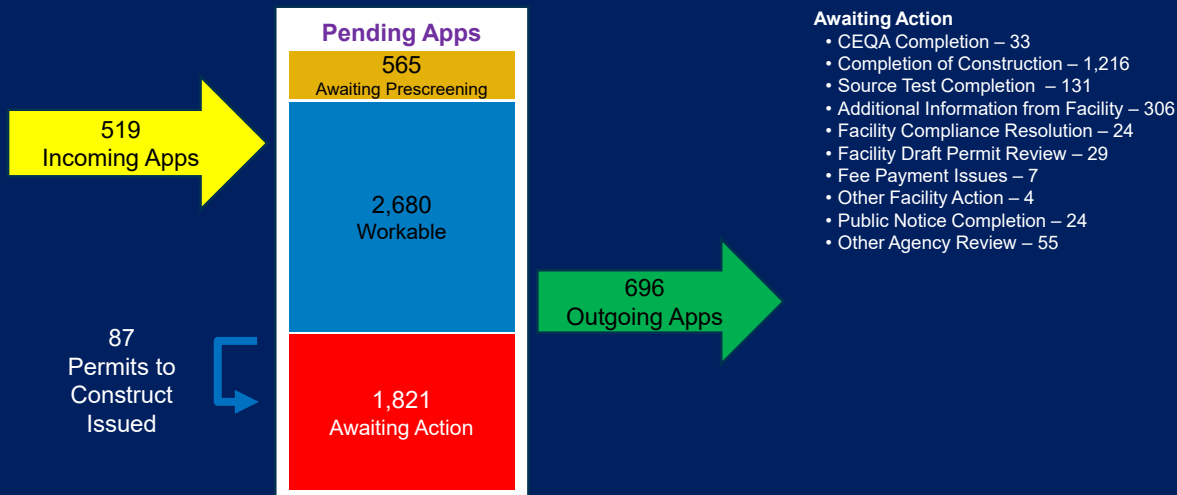 - Currently analyzing data to develop recommendations

FY 2024-25 Application Completion Goal

- Goal: Increase production by 500 completions as compared to 2023
- Production rate attained and sustained throughout 2025

FY 2024-25 Goal
(489 per month, average)

504

410

PEP Announced

PEP Workplan

Completions Per Month (12-Month Rolling Average)

— Rolling 12-Month Average   - - - FY 24-25 Goal

Permit production increased under PEP

SSC PEP Monthly Update
Application Workflow (July 2025 Report Period)

Pending Apps

565 Awaiting Prescreening

2,680 Workable

1,821 Awaiting Action

519 Incoming Apps

87 Permits to Construct Issued

696 Outgoing Apps

Awaiting Action
- CEQA Completion – 33
- Completion of Construction – 1,216
- Source Test Completion – 131
- Additional Information from Facility – 306
- Facility Compliance Resolution – 24
- Facility Draft Permit Review – 29
- Fee Payment Issues – 7
- Other Facility Action – 4
- Public Notice Completion – 24
- Other Agency Review – 55

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Application Workflow Breakdown (June 2025)
Two Permitting Programs

Minor Source

Pending Apps

440 Awaiting Prescreening

1,674 Workable

3

967 Awaiting Action (with PC Issued)

201 Awaiting Action (without PC)

473 Incoming Apps

74 Permits to Construct (PC) Issued

583 Outgoing Apps

EPA / Other Agency Review

Title V

Pending Apps

125 Awaiting Prescreening

1,006 Workable

52

386 Awaiting Action (with PC Issued)

212 Awaiting Action (without PC)

46 Incoming Apps

13 Permits to Construct (PC) Issued

113 Outgoing Apps

EPA / Other Agency Review

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Next Steps

- **Production under PEP has stabilized and significantly increased**
- **Past reporting looked at overall application inventory numbers**
  - Historical approach resulted in unintended focus on lower priority, easier applications
  - FY 2024-25 included production goal PLUS two aged application initiatives
- **Staff re-assessing priorities and focus areas**
  - New detailed reporting bins being evaluated for next steps
  - Workplan to be developed

Comments

General Permitting Update

Certified Permitting Professional (CPP) Program

CPP Program Background

- **Chair's Permitting Enhancement Program (PEP) initiative identified the CPP Program as a specific enhancement opportunity to improve efficiency, transparency, and program value**
- **The CPP Program, initiated in 1992 is intended to:**
  - Identify professionals:
    - Knowledgeable about South Coast AQMD standards and requirements
    - Capable of performing engineering evaluations
  - Result in more complete permit applications and reduce permit processing times
  - Aid applicants in recognizing compliance requirements and necessary permit conditions

Progress and Status

- **PSTF Discussion**   **December 10, 2024**
  - Open discussion on the current effectiveness of the program
  - Identify and prioritize changes that ultimately result in quicker permit processing timelines
- **PEP Update to Governing Board**   **March 7, 2025**
  - Highlighted opportunities identified by PSTF for continual improvement
  - Update supporting tools and explore process improvements through pilot program opportunities

Progress and Status
(cont.)

- **Permitting Working Group (PWG) Discussion**   **April 23, 2025**
  - Additional tools and resources for CPPs
  - Process improvements to CPP Program
  - Elements identified for workplan
- **PSTF Update**   **August 13, 2025**
  - Discuss feedback received and proposed improvements
- **PEP Update to Board**   **Q3 / Q4 2025**
  - Summarize PSTF CPP enhancement recommendations
- **Implement CPP Workplan**   **2025 +**

Feedback Received from PSTF / PWG
CPP Manual Updates Needed

- **CPP Manual is outdated**
  - Last revision was in 2011
    - Regulatory information and citations are outdated and do not reflect current requirements
    - Lack of examples that reflect current technology
  - Needs to be updated regularly
- **CPP Manual content should align more with the CPP exam**

Proposed Improvements
- **Update CPP Manual to include:**
  - Re-formatting chapters
  - Updating and adding new content and references
  - Expand evaluation examples
- **Release draft chapters for review and discussion at future meetings**
- **Identify chapter update frequency on as needed basis**
- **Add chapter focused on CPP exam preparation**

Feedback Received from PSTF / PWG
Lack of Feedback to CPPs on Submittals

- **Applications submitted by CPPs don't have a formal feedback mechanism**
- **Lack of feedback does not allow CPPs to improve submittals**
- **No incentive for CPP applications vs non-CPP applications**
- **Need to be able to better track CPP applications and for:**
  - Immediate feedback
  - Post approval feedback

Proposed Improvements
- **Develop a CPP application workflow**
- **Allow for focused pre-application meetings**
- **Develop checklists to set expectations and provide feedback on CPP applications**
- **Integration into future CPP Program:**
  - Additional or revised tools, CPP Manual chapters
  - Identify bottlenecks from complex rules to encourage regulatory streamlining

Feedback Received from PSTF / PWG
More Resources and Tools are Needed

- **Lack of checklists for CPP submittals**
- **Lack of access to:**
  - Policies and procedures
  - Technical references
  - Approved emission factors
  - Sample permit applications
- **Need to improve CPP listing to boost CPP Program visibility**

Proposed Improvements

- **Develop new pre-application checklists and expectations of CPP applications**
- **Integrate key tools and resources within the CPP Manual**
- **Release draft guidance documents for review and discussion at future meetings**
- **Revisit and revise the web CPP listing to boost visibility**

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Feedback Received from PSTF / PWG
Develop Different Levels of CPP

- **Provide opportunities for continual improvement / continuing education**
- **Specialization or multi-level credentials ("CPP+")**
- **Higher credentialed CPPs should have access to more streamlined approval pathways**

Proposed Improvements

- **Explore revising the CPP Exam to allow for initial certification followed by demonstrated performance through CPP application submittals to achieve higher level credentials**
- **Incentivize CPP+ applications by allowing access to streamlined workflow**
- **Explore CPP specialization based on equipment types**
- **Utilize a pilot program to evaluate feasibility, effectiveness, and cost**

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CPP Program Enhancement Goals
Where Does It All Fit?

Improve Efficiency
Reduce permit application processing times

Enhance Effectiveness
Leverage CPP Program to improve quality of application submittals

Increase Participation
Increase the number of permit applications submitted by CPPs

Comments

Certified Permitting Professional Program

Task Force Member Discussion – Compliance Assurance

Task Force Member Question

"Compliance Assurance Policy - It is unclear what permit conditions are required for 'compliance assurance.' Is there a policy that clarifies applicable requirements?"

Rule 204 – Permit Conditions

"To assure compliance with all applicable regulations, the Executive Officer may impose written conditions on any permit. The Executive Officer may, after 30-day notice to the permittee, add or amend written conditions on any permit upon annual renewal to assure compliance with and enforceability of any applicable rule or regulation. Additional provisions, as required by Title V of the federal Clean Air Act, for the reopening of facility permits are specified in Regulation XXX. Commencing work or operation under such revised permits shall be deemed acceptance of all the conditions so specified."

Why Permit Conditions Matter

▪ **Permit Conditions Establish Compliance Expectations**
  – Define enforceable expectations for facility operation
  – Translate technical standards into actionable requirements
  – Serve as the foundation for meeting emission limits and standards

▪ **Effective Conditions Help:**
  – Prevent noncompliance with applicable standards
  – Clarify roles for operators and inspectors
  – Ensure consistent enforcement and regulatory certainty

Building Effective Permit Language

▪ **Key Attributes of Permit Conditions:**

  – Clarity – Use unambiguous, specific language

  – Enforceability – Specify actions, frequencies, and thresholds

  – Relevance – Focus on operational aspects that impact emissions

▪ **In Practice, This Means:**

  – Defining control device parameters (e.g., temperature, pressure)

  – Requiring routine maintenance and calibration logs

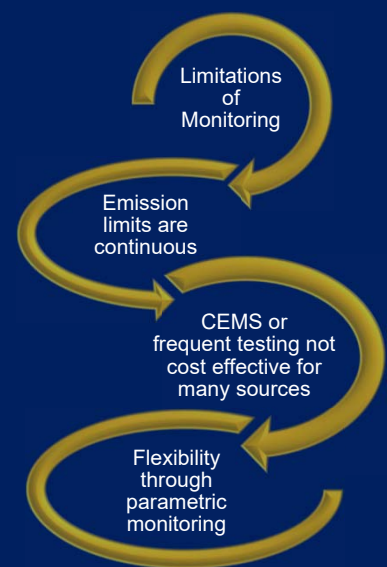 – Establishing actions for malfunctions, startups, and shutdowns

  – Recordkeeping

The Role of Monitoring in Compliance Assurance

▪ **Monitoring as an Effective Tool:**

  – Confirms control strategies are effective

  – Provides trending information to prevent deviations

  – Strengthens accountability through data

▪ **Philosophy Behind Monitoring:**

  – Proactive assurance rather than reactive enforcement

  – Real-time feedback enables corrective action

  – Compliance becomes a continuous operational goal

Limitations of Monitoring

Emission limits are continuous

CEMS or frequent testing not cost effective for many sources

Flexibility through parametric monitoring

Monitoring

- **Emissions limits apply continuously**
  - Rules typically provide high level requirements without site specific considerations
  - Source testing provides a snapshot
  - Preventative requirements implemented through source testing parameters
  - Flexibility provided through parametric monitoring
  - Wording and approach is case by case

- **Conditions should be practically enforceable**

Factors to consider

Facility NSR balance	Type and amount of emissions
Design of equipment	Air pollution collection and control strategies
	Regulatory threshold avoidance

Facility Requests

- **Facilities may request to remain below thresholds to limit additional regulatory impacts. Additional permit conditions are needed to enforce those lower emission levels.**
- **Examples:**

BACT	• BACT threshold 1 lb/day • Daily emission limits and recordkeeping to avoid BACT
Offsets	• Additional monthly emission limits • Facility may adjust operations and scope
Health Risk Thresholds	• Acute health risk may trigger hourly or daily limits • Limits for material usage limits or stack height
Title V	• Rolling 12-month emission limit to avoid Title V permitting • Additional recordkeeping and reporting requirements
Public Notice	• Facility may limit emissions or locate equipment to avoid triggering public notice distribution

Additional Resources
U.S. EPA

- **Setting Enforceable Potential to Emit Limits in Permits**
  - https://airknowledge.gov/SI/PERM203-SI.html
- **Guidance on Limiting Potential to Emit in New Source Permitting**
  - https://www.epa.gov/enforcement/guidance-limiting-potential-emit-new-source-permitting-june-13-1989

Comments and Discussion

Task Force Member Discussion – Compliance Assurance

Other Business

Comments

Other Business

Public Comment

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