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FINAL

PERMIT STREAMLINING REPORT FOR SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

APPENDICES

Submitted to

Mohsen Nazemi
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765

Prepared by

AVES, an Affiliate of ATC Associates Inc.
50 East Foothill Boulevard
Arcadia, CA 91006

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Appendix A

AQMD Staff Interviews

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? Chemical/Mechanical

What is your job title? AQ II

What types of companies do you typically process permits for? Textile/carpet/asphalt batch plants/gypsum

Are you assigned to specific companies? Yes

How many years have you been working at the District? 10 1/2

How many permits do you process annually? Approx. 30/month for our group

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming? NSR – using the CLASS system never fixed old problems

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly? NO

CLASS

CAPPS

NSR 1-2 days w/new system – Phil B. has to fix

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? NO

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors?
Source test data?

BACT/LAER?

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401? NO

What is the typical process for handling Rule 1401? NO

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA NA
health risk assessments NA
emission reduction credits – computer can autom. calc. if info. is up to date
source test reports or YES – send to source groups – 6 months – 12 months
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly?

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? NO 1 day each

If not, why not? Works better for small companies; large sources make less mistakes

How does the District ensure applications are deemed complete by default date?

Pre-screening at desk may save time; checks could get lost

8. Has your division used outside consultants to assist in reducing the backlog? NO

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute? NA

9. Is internal policy for various types of equipment published in-house for consistency and

speed in permitting? Terry Moore instituted a tracking system; new proposed barcode system - may take even longer – many questions for this group permit services

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated?

If so, how often are the templates updated? Engineer eval. saved on computer for use in future

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help? old CAPPS – could click on box and permit conditions would pop up.

11. Do you have any suggestions regarding fee structure or equity? Permit cond. not user friendly in facility permitting system; RECLAIM/Title V – systems hard to apply permit condit.

12. Do you have any additional suggestions for making the permit process more efficient? NSR & facility permit problems

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? "computer automation" RECLAIM/Title V Admin.

What is your job title? AQ Engineer II

What types of companies do you typically process permits for? Don't process permits anymore

Are you assigned to specific companies? Not applicable

How many years have you been working at the District? 10 years

How many permits do you process annually? N/A

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming?

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly?

    CLASS – Pre-screening tied to class

    CAPPS – won't need CAPPS anymore for facility permit under new FPPS

    NSR – not a module in FPPS (new contract next year Saad Karam)

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? NO

What other sites may help process permits faster? Mgr. decides who gets internet access, it would help because EPA/CAPCOA website contains BACT clearing house

4. Are you often required to research information on:
Emission factors?
Source test data?
BACT/LAER? – BACT Guideline – gas turbine 3ppm recently updated

What are your sources when you do research for such information? BACT guidelines; EPA internet – guidance doc.

5. Do you often evaluate applications subject to Rule 1401? NO

What is the typical process for handling Rule 1401? N/A

What could be done to improve this process?

6. Have you processed any permits that require: N/A

CEQA NO
health risk assessments NO
emission reduction credits
source test reports or
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly?

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time?

If not, why not?

How does the District ensure applications are deemed complete by default date?

8. Has your division used outside consultants to assist in reducing the backlog?

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits

governed by rule, regulation or statute?

2. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated?

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved? FPPS will include an emissions calcs. Module w/equations that the engineer can use, or they can build their own. For example, R1146 Nox=_____ or R404pm=_____

If not, would such a program help?

11. Do you have any suggestions regarding fee structure or equity?
-new R.301 requires a T&M fee schedule for Title V applications
-current timesheets may include a few job #s (charge codes)
-eliminate BCAT/CCAT? – tied to fees only!

12. Do you have any additional suggestions for making the permit process more efficient?
Facility permit system only allows SR or AQAC to print a facility permit (FPPS)
-include CAPPS in this program
-no electronic archiving
-old equipment – based permit will be printed out for “inspectors view”
-manages 5 contractors now

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? Large Coating/Printing

What is your job title? Sr. AQ Engineer

What types of companies do you typically process permits for? Coating/printing – lg. TitleV/RECLAIM

Are you assigned to specific companies? Specific letters your group

How many years have you been working at the District? 18

How many permits do you process annually? Approx. 50/month (lots Title V)

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming? Engineering evaluation – BACT (spray booths esp.)

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly? NO, can't print permit

CLASS

CAPPS

} more data entry done by engineer now used to be done by permit services; system is set up to approve or disapprove permit

NSR

Do you have any suggestions for enhancing such systems? used to hard write Δ of new emissions – how computer checks ERCs etc.

3. Do you use the internal AQMD website? rarely

What other sites may help process permits faster? Rules from Q drive website = 1 more site

4. Are you often required to research information on:
Emission factors? Sometimes (ask teams who work on it a lot)
Source test data? " older supervisor
BACT/LAER? Yes

What are your sources when you do research for such information? PomPom group – access to EPA & CAPCOA clearing house

5. Do you often evaluate applications subject to Rule 1401? Not too much

What is the typical process for handling Rule 1401? Tier I or Tier II screen. Done by engineer co. may switch coatings

What could be done to improve this process? HRA – call co. & send over to 1401 group.

6. Have you processed any permits that require:

CEQA – Not too much
health risk assessments – not many
emission reduction credits – 5-10
source test reports or – more freq.
facility info. from Information Management? – BACT/LAER only get that from CLASS

Does this interaction with other SCAQMD groups work smoothly? Pretty easy – timing issues – source test has engineer shortage

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? Yes – engineer who does pre-screen. Is assigned to that application

If not, why not?

How does the District ensure applications are deemed complete by default date?

8. Has your division used outside consultants to assist in reducing the backlog? Yes

Has this helped? Helped backlog

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute? Scope of work lasted 2 years; can help toward 180-day limit

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting? Some, a lot is unwritten due to spec. situations

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help? CAPPS – includes permit cond. for standard equipment; varies by engineer & team

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated? Not 1 template – each engineer builds their own template

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved? Formatting problems; hard to use tabs; doesn't line up well

If not, would such a program help? Basic templates w/elements – "background" process description

11. Do you have any suggestions regarding fee structure or equity?
-not a specific category
-1401 has a "signif. Project" table charge
-CEQA (by hr.)
-no special NSR review charge; 9 letter & 2 notices; school =1 notice
-public notice charge for 212 emiss. (secretary used to do it)

12. Do you have any additional suggestions for making the permit process more efficient?

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? Energy/OCS

What is your job title? AQ Engineer II

What types of companies do you typically process permits for? LADWP/Gas Company

Are you assigned to specific companies? Yes

How many years have you been working at the District? 10

How many permits do you process annually? Large companies (6-10/month)

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming?
-doing calculations
-coming up w/conditions
-looking up old applications/permits that the engineer keeps on their computer

Is there anything that could be done to reduce the time spent or ease the difficulty level?
-they share the info. w/other engineers

2. Have these programs allowed you to process permits more quickly? NO

CLASS

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? No internet access; supervisor has it; supervisor looks up BACT clearing house

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors?
Source test data?
BACT/LAER?

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401? Yes, screening analysis

What is the typical process for handling Rule 1401? Screening done by engineer

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA – Yes-ask Steve Smith
health risk assessments - Yes
emission reduction credits - Yes
source test reports or - Yes
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly? Yes

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? NO – still get lots of applications w/missing info.

If not, why not? Pre-screen – should <u>just</u> look at fees; BCAT/CCAT – tied to R.301 fees

How does the District ensure applications are deemed complete by default date?

8. Has your division used outside consultants to assist in reducing the backlog? NO

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

**Pre-screening should be done at engineer's desk; against idea of 1 pre-screener

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated? Need a template with R.1401 template for new rule; BACT analysis; rule evaluation

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help? Yes

11. Do you have any suggestions regarding fee structure or equity? Where there isn't a R301 category, AQMD is supposed to charge Sched. C

12. Do you have any additional suggestions for making the permit process more efficient?
-look for BACT, ERCs (Reg. XIII), R.1401
-don't spend so much time on other rule evaluations (i.e. R401/402/403 etc.)
-rule 1401 template showing that all 4 calcs. have been made (MICRres, MICRw, HIchrome, HIacute)
-template – facility background, process description, rule eval., NSR eval., R.1401 eval.

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? Public facilities

What is your job title? AQAC

What types of companies do you typically process permits for? Landfills, sewage treat., airport, POLA, POLB, hospitals, universities, military

Are you assigned to specific companies? No

How many years have you been working at the District? 35

How many permits do you process annually? Approx. 40/month

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming? Lots of typing required in the new system (hard to type equations) – allow hand-written calcs.

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly? NO

CLASS – cause probs. that can't be easily fixed

CAPPS – once supervisor Oks permit, system is locked – no one could open it to fix mistake

NSR = problem area – not accurate for older facilities that have been in system a while – can't balance new charges/old

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? For rules internal internet only

What other sites may help process permits faster? BACT clearinghouse internet access may be helpful for some people

4. Are you often required to research information on:
Emission factors? Yes
Source test data? Yes – this group reviews source test, in-house 90% don't sent them down – too slow
BACT/LAER? Haven't look up LAER yet

What are your sources when you do research for such information? BACT Guidelines

5. Do you often evaluate applications subject to Rule 1401? Yes

What is the typical process for handling Rule 1401? Engineer in group calcs. Screen I & II if it doesn't pass, call co. & they do HRA which is sent to planning

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA – usually city projects
health risk assessments – planning – time consuming
emission reduction credits – eng. Calc. – co. buys it
source test reports or – do in-team
facility info. from Information Management? – CAPPS got locked

Does this interaction with other SCAQMD groups work smoothly? Memo – mgr. to mgr.

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? No

If not, why not? – incomplete apps still get to desk of engineers

How does the District ensure applications are deemed complete by default date?
-rejection letters should go out in a more timely manner, so it doesn't use up 180-day clock

8. Has your division used outside consultants to assist in reducing the backlog? Not now; last year, yes, lots of supervisory time needed

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting? Not official policy; registered equipment up to each group – R.1151 plan for landfill excavation has permit conditions

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated? Not official template

If so, how often are the templates updated? Eng. re-use apps. for similar equip.

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help? CAPPS – had emergency ICEs template, but most people don't use it – too many little variations

11. Do you have any suggestions regarding fee structure or equity? Modif. for large facility is handled by higher fee schedule but mod. for 1 small piece of equip. is same price

12. Do you have any additional suggestions for making the permit process more efficient? Re-print & revise facility permits once/year

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? H=soil remed./service station/small electronics

What is your job title? Sr. AQ Engineer

What types of companies do you typically process permits for? Gas stations/circuit board man.

Are you assigned to specific companies? Yes, for gas stations only soil remed. Based on workload – 7 engineers w/4 assigned to gas station Thai Tran=soil remed.

How many years have you been working at the District? 14

How many permits do you process annually? 200/monthly

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming? Engineer eval.

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly? Yes

    CLASS

    CAPPS – service stations – works well

    NSR – not too many NSR issues, breeze through

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? Don't have to use it; everyone has internet

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors? Yes
Source test data? – supervisor reviews 95%
BACT/LAER? – not too much

What are your sources when you do research for such information? EPA/ARB library via internet or phone

5. Do you often evaluate applications subject to Rule 1401? Yes, lots

What is the typical process for handling Rule 1401? Eng. Calcs. Tier I, II, II for application – if Tier IV – call co

What could be done to improve this process? Send to modeling in planning

6. Have you processed any permits that require:

CEQA – not a lot
health risk assessments - planning
emission reduction credits – not lots
source test reports or- in-house
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly? Yes

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? No

If not, why not? Just looking for fees & basic info.; not detailed review

How does the District ensure applications are deemed complete by default date?
-don't routinely send a "deemed complete" letter

8. Has your division used outside consultants to assist in reducing the backlog? Yes

Has this helped? Yes, backlog – they worked on simpler equip.

Can the outside help be obtained quickly enough to assist you properly and within time limits

governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated? Developed by engineer

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help? Gas stations have module developed as part of CAPPS system; can be done in 1 hour

11. Do you have any suggestions regarding fee structure or equity? Emergency ICE may be faster w/a template

12. Do you have any additional suggestions for making the permit process more efficient? BCATS – determine fee; tracks equipment/inventory

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? Refinery/Energy/OCS

What is your job title? AQ II

What types of companies do you typically process permits for? Sometimes air products/ DeMenno Kerdoon

Are you assigned to specific companies? Ultramar

How many years have you been working at the District? 14

How many permits do you process annually? few – 20/month

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming? getting info. from company, diskette w/steps on it to company

Is there anything that could be done to reduce the time spent or ease the difficulty level?
-more training for applicants
-checklist of items for applicant
-give good info./but not user friendly; sometimes server down

2. Have these programs allowed you to process permits more quickly? No – slower (a lot)

CLASS

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? No

What other sites may help process permits faster? No internet access; could have simplified or eliminated BCAT altogether; BCAT – fees; emission inventory track

4. Are you often required to research information on:
Emission factors? Yes – AP-42
Source test data? Yes – Scott in source test group
BACT/LAER?

What are your sources when you do research for such information? Use AQMD guidelines

5. Do you often evaluate applications subject to Rule 1401? Expecting more 1401 now

What is the typical process for handling Rule 1401? If they needed a HRA, they would call co.

What could be done to improve this process? Review HRAs in this group, not planning

6. Have you processed any permits that require:

CEQA – call Steve Smith
health risk assessments – in house
emission reduction credits – engineer checks w/ERC group
source test reports or – they take 1st look & send to source test group
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly? Yes

If not, what can be done to make these interactions more efficient?
-should pre-screen at desk
-pre-screen for one week
-reference materials at desk
-easier at desk

7. Has pre-processing and pre-screening reduced your processing time? Slower

If not, why not? A lot of appl. have missing data

How does the District ensure applications are deemed complete by default date? No – process can take more than 30 days

8. Has your division used outside consultants to assist in reducing the backlog?

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated? Process lots of different equip.

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved? Tanks would not make a good template

If not, would such a program help? Can't think of any equipment that could use a template in this group

11. Do you have any suggestions regarding fee structure or equity?

12. Do you have any additional suggestions for making the permit process more efficient?
-fees are priority for pre-screen
-sometimes permit services sends to wrong group
-supervisor only can print final RECLAIM permit

INTERVIEW QUESTIONS FOR PERMIT SERVICES

ENGINEER BACKGROUND

What permit processing team do you work in? _____

What is your job title? Data Entry _____

What types of companies do you typically process permits for? Data entry – C, H, I, J, K, L, T

Are you assigned to specific companies? _____

How many years have you been working at the District? 13 _____

How many permits do you process annually? _____

EXPERIENCE BACKGROUND N/A

1. What aspect of permit processing is most difficult/time consuming?

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly?

CLASS

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website?

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors?
Source test data?
BACT/LAER?

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401?

What is the typical process for handling Rule 1401?

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA
health risk assessments
emission reduction credits
source test reports or
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly?

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time?

If not, why not?

How does the District ensure applications are deemed complete by default date?

8. Has your division used outside consultants to assist in reducing the backlog?

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated?

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help?

11. Do you have any suggestions regarding fee structure or equity?

12. Do you have any additional suggestions for making the permit process more efficient?

NOTES:

-engineers don't want to help people in lobby or desk
-phone # for groups are not manned
-District doesn't want reject
-Steve Heisher wants to work
-400A is missing info & font too small
missing info:-1,000 ft. school
-confid.
-start/completion
-mandatory fields not include gross receipts/# employees
-pre-screen at desk in lobby
-no-one supervises engineers in pre-screening
-always new engineer makes it difficult to complete the not straightforward ones
-a "pending drawer" is used to match add'l checks to current apps. after the co. was called to send extra $
-small business assistance will help at their facility or come to the District
-Suzanne Green used to work at permit services desk

-everyone in permit services except Steve takes a turn at help desk
-assemble batches
-deliver next morn.
-someone must sign for it
-varies by unit
-list goes to April who keeps count of # of applications processed/day 2-100
-would work more smoothly w/same pre-screeners
-1/3 are not ok by time data entry
-no checks lost
-if company has an overpay they can call customer service for ok
-3 call rule is a policy, but not everyone does it

Data Entry
-check ID
-assign one
-data entry
-generate application #
-verify that application is active & previous permit numbers
-if not paid, call engineer because it's inactive
-generate folders by 7, 30, 180
-labels for application folder
-fee sheet = 3 pages; 1 to finance, 1 letter to co. which says appl. was accepted; 1 company letter shows amt. of time & tells them to go to Hearing Brd.
-85% rule will hinder permit services because they will have to copy everything

INTERVIEW QUESTIONS FOR PERMIT SERVICES

ENGINEER BACKGROUND

What permit processing team do you work in? Permit Services

What is your job title? Data Technicians

What types of companies do you typically process permits for? change of ownership

Are you assigned to specific companies? desk person for 5 years

How many years have you been working at the District? 8

How many permits do you process annually?

EXPERIENCE BACKGROUND N/A

1. What aspect of permit processing is most difficult/time consuming?

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly?

CLASS

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website?

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors?
Source test data?
BACT/LAER?

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401?

What is the typical process for handling Rule 1401?

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA
health risk assessments
emission reduction credits
source test reports or
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly?

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time?

If not, why not?

How does the District ensure applications are deemed complete by default date?

8. Has your division used outside consultants to assist in reducing the backlog?

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated?

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help?

11. Do you have any suggestions regarding fee structure or equity?

12. Do you have any additional suggestions for making the permit process more efficient?

NOTES:

-not enough printers for permits
-label printer sucks
-can't correct computer data entry mistakes
-use one-2 full-time pre-screeners
-no ownership of apps. in pre-screening
-change of ownerships done entirely in permit services
-no one knows how to do RECLAIM change of ownership
-85% policy will be slower
-start R.301 "Hot Line #"
-make Forms simpler
-no 400A booklet anymore
-33-20 400 ES
-400 CS easier for
-assign to units right away
-keep change of ownership & HEPA filters - 7 days

-small source engineers went to desk, but everyone else blew it off
-engineers don’t know how to pre-screen; no consistency
-IM - Saad Karam - fees aren’t updated in CLASS
-Unit B pre-screens at desks for about 2 years (takes lots more time for permit services to cater to Unit B)

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? Small Coatings

What is your job title? AQE II

What types of companies do you typically process permits for? furniture, autobody, printing, non-RECLAIM chemical

Are you assigned to specific companies? work basis try to give previous to same person

How many years have you been working at the District? 10

How many permits do you process annually? approx. 15-20 unit/month approx. 9 people Fred L.

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming?

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly? NO

CLASS - pre-screening calc. fees only - time consuming BCAT=tracks permits for a database

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? NO

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors?

Source test data?
BACT/LAER?

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401?

What is the typical process for handling Rule 1401?

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA
health risk assessments
emission reduction credits
source test reports or
facility info. from Information Management?

Does this interaction with other SCAQMD groups work smoothly?

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? NO

If not, why not? time must be spent one way or another

How does the District ensure applications are deemed complete by default date?
-it doesn't

8. Has your division used outside consultants to assist in reducing the backlog?

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated?

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help?

11. Do you have any suggestions regarding fee structure or equity?

12. Do you have any additional suggestions for making the permit process more efficient?

NOTES:

-3 call policy - not clear
-call from pre-screen room
-small coatings in pre-screen for 1 week at time
-15% policy will help save time over old $5 way
-accepting more saves time (if $ is there)
-notice to comply - applications should not be rejected
-they are under a time constraint to turn in a P to O
-hard copy log of rejected applic. - no computer log
-cash checks as soon as they come in
-rejects - $ goes back
-$ to finance ASAP
-180-day are lowest priority in permit services
-33 Forms - 19 Forms
-400-C - 400-E

-more forms may be easier for small businesses - rather than combining various types; i.e. lithographic/
-Fred Lettice = one of only groups who answers group help phone #
-give help desk actual names & #s to call from each team

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? small elec/serv. station/soil

What is your job title? AQE II

What types of companies do you typically process permits for?

Are you assigned to specific companies? specific major oil companies

How many years have you been working at the District? 9

How many permits do you process annually? 45-50/month

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming?
-add'l info. from co.
-public notice (30-day wait)

Is there anything that could be done to reduce the time spent or ease the difficulty level?

2. Have these programs allowed you to process permits more quickly? Yes

CLASS

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? No, internet yes

What other sites may help process permits faster? ?

4. Are you often required to research information on:
Emission factors?

Source test data?
BACT/LAER? - N/A - Phase II vapor recovery

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401? Yes

What is the typical process for handling Rule 1401? Engineer performs initial screening to Tier II; Co. does HRA if they need it

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA - N/A
health risk assessments - planning - wants 1 month
emission reduction credits - engineer
source test reports or - R.461 requires re-verification
facility info. from Information Management? - if they want to search for data (#equip) of fix mistakes

Does this interaction with other SCAQMD groups work smoothly? they can contact IM directly (Phil Barocca, Knut Beraldsen)

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? Yes, each engineer has their own way of doing it

If not, why not?
I x/every other week - phone duty = 1 x every other week; 5-6 calls/day

How does the District ensure applications are deemed complete by default date?
-phone message says permit services calls will be returned w/in 15 min.

8. Has your division used outside consultants to assist in reducing the backlog?

Has this helped? Yes - contract ran out in October

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute? they converted P to C and P to Operate they did not do NSR evals.

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

-small business assist. helps w/variances
-avg. 20-25 calls/day
-R.461 tech. expert for variances & rule

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated?

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help?

11. Do you have any suggestions regarding fee structure or equity?

12. Do you have any additional suggestions for making the permit process more efficient?

NOTES:

-CAPPS - system contains “gas station module”
-enter data
-program calcs. emiss.
-calcs. 1401 autom.

-400A+ 400E-11 if filled out completely, info. can be put into CAPPS
-400E-11 now
-includes above-ground tanks info.
-mobile fueler also included
-approx. 1/2 hr. for all data entry in CAPPS

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? J-Neighborhood Comm.

What is your job title? AQE II

What types of companies do you typically process permits for? small sources - no Title V

Are you assigned to specific companies? NO

How many years have you been working at the District? approx. 8

How many permits do you process annually? 188 (approx. 7 people/group) per month

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming? getting info from co.

Is there anything that could be done to reduce the time spent or ease the difficulty level?
-lead them to small business assist. office

2. Have these programs allowed you to process permits more quickly?

CLASS When working - stuck in middle of task

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website? a few people have internet access

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors?
Source test data?
BACT/LAER?

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401? not in past; maybe w/new rule

What is the typical process for handling Rule 1401?

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA - rarely - applicant tells AQMD
health risk assessments - rarely
emission reduction credits - PTE balances not accurate
source test reports or - in-house team members review source tests
facility info. from Information Management? - source tests takes a long time to review

Does this interaction with other SCAQMD groups work smoothly? N/A

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? Yes, use very strict permitting standards

If not, why not? reject lots

How does the District ensure applications are deemed complete by default date?

8. Has your division used outside consultants to assist in reducing the backlog? NO

Has this helped?

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute?

9. Is internal policy for various types of equipment published in-house for consistency and

speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated? group made its own template; boilers, charbroiler, dry cleaner

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help?

11. Do you have any suggestions regarding fee structure or equity?

12. Do you have any additional suggestions for making the permit process more efficient?
-update permit processing hardbook & retrain engineers

NOTES:

-400A is screwed up!
-letter doesn't have enough space for comments
-rejection letter to applicants says that they were contacted 3x even though they might not have been
-BCAT=fees
-7/30/180=bogus
-tracking system needed - so you can tell where appl. is at each stage
-train source test people to work in each team so source tests don't have to be sent down
-3 phone calls=bogus system
-is there a brochure for small business assistance?
-#1=dry cleaner application
-transfer unit phone # to each engineer who rotate on 1/2 day basis

INTERVIEW QUESTIONS FOR PERMIT ENGINEERS

ENGINEER BACKGROUND

What permit processing team do you work in? Air Toxics

What is your job title? AQE. II

What types of companies do you typically process permits for? mostly metal plating

Are you assigned to specific companies? _____

How many years have you been working at the District? 9 1/2

How many permits do you process annually? 20-25/month (3 eng.)

EXPERIENCE BACKGROUND

1. What aspect of permit processing is most difficult/time consuming? putting in conditions relative to CAPPS; conditions cannot be cut & paste

Is there anything that could be done to reduce the time spent or ease the difficulty level?
2 days more work to cut & paste into CAPPS, not flexible

2. Have these programs allowed you to process permits more quickly?

CLASS new conditions for NESHAP facilities

CAPPS

NSR

Do you have any suggestions for enhancing such systems?

3. Do you use the internal AQMD website?

What other sites may help process permits faster?

4. Are you often required to research information on:
Emission factors?
Source test data?

BACT/LAER?

What are your sources when you do research for such information?

5. Do you often evaluate applications subject to Rule 1401? Yes - only 3 engineers they may be asked to work on non-permits

What is the typical process for handling Rule 1401?

What could be done to improve this process?

6. Have you processed any permits that require:

CEQA ? ignore box -400B would be more work
health risk assessments - Yes
emission reduction credits - Yes
source test reports or - Yes - 70%
facility info. from Information Management? - approx. 4 weeks to ok a protocol & source test reviews report approx. 4 weeks

Does this interaction with other SCAQMD groups work smoothly?

If not, what can be done to make these interactions more efficient?

7. Has pre-processing and pre-screening reduced your processing time? nuisance, but should be done

If not, why not? rotate in 1x/month

How does the District ensure applications are deemed complete by default date?

8. Has your division used outside consultants to assist in reducing the backlog?

Has this helped? NO

Can the outside help be obtained quickly enough to assist you properly and within time limits governed by rule, regulation or statute? N/A

9. Is internal policy for various types of equipment published in-house for consistency and speed in permitting?

If so, how frequently is it updated?

How easy is it to obtain?

How could this process be improved?

If not, would such a program help?

10. Are there templates for each type of equipment processed that are updated frequently so that engineers are consistent and work does not have to be repeated?

If so, how often are the templates updated?

How easy is it to obtain them?

How could this process be improved?

If not, would such a program help?

11. Do you have any suggestions regarding fee structure or equity?
-stop trying to make it better
-work like other agencies
-don't worry about image
-help engineers out more
-make realistic promises to co.
-need more engineers in small bus. or permit services
-don't need 7/30/day categories (unrealistic)
-pre-screening has saved time because incomplete have been
-doesn't call - he sends the application back
-3 call system not practical
-system does not accept applications w/incorrect fees
-85% policy won't work
-sending them back saves time
-unit made up their own templates for equipment by saving previous reports
-add a source test person to this unit

12. Do you have any additional suggestions for making the permit process more efficient?

Appendix B

APPLICANT Interviews

INTERVIEW QUESTIONS FOR PERMIT APPLICANTS

Thank you for assisting with this South Coast Air Quality Management District (SCAQMD) permitting survey. Please take a few minutes to complete these 10 questions. The identities of those completing the questionnaire will be kept confidential. This information will be used to help expedite the current permit processing system.

FACILITY BACKGROUND

How many employees does your company have in Southern California? Approximately 30

What type of business is conducted by your firm? Environmental Engineering Permits, Equipment Sales & Service

How many years of experience do you have working with the SCAQMD? 20+

SCAQMD PERMITTING QUESTIONS

1. How many permit applications do you submit to SCAQMD each year? 30+

   Are they primarily administrative-type changes or Permits to Construct for new equipment?
   All

For questions 2 & 3, please check "Yes" or "No":	Yes	No
2. Would you be willing to pay an additional fee for expedited permit review?	☒	☐

What percentage of the current fee would you be willing to pay? +25%

3. Have you ever used any of the following SCAQMD permitting services?

Permit assistance desk/operator	☒	☐
Small business assistance	☒	☐
Registered equipment permit processing	☐	☒
WARP system	☐	☒
AQMD website with permit applications and checklists	☒	☐

If yes for any of the above, what did you find helpful? Website very helpful

Not helpful?

4. What aspect of permit application preparation is the most difficult/time consuming? Emission calcs.

   What could be done to reduce the time spent or the difficulty level of that portion of the process? Website publication of more AP-42 kind of info.

5. What is your biggest frustration with the permitting process? Time delays

6. What is the shortest amount of time it has taken to receive a permit? About 1 month

   The longest? Years

   The average? 6 months?

   What, if anything, caused delays in the process? AQMD

   Were the delays related to problems internal, external or with the District? District

7. Has the District ever asked you to provide additional information to help process your application? Yes

   If so, what type of information did they want? Equipment details, production rates

8. How soon after you submit your permit are you contacted by the District? Seldom – I usually call first.

9. What, if any, have been specific areas in the permit process that continually produce problems or delays in your pursuit of permits?

Can they be reduced or remedied? If so, how?

10. Do you have any additional suggestions for making the permit process more efficient? Try to give verbal approval on simple or small applications and let formal approval come later.

INTERVIEW QUESTIONS FOR PERMIT APPLICANTS

Thank you for assisting with this South Coast Air Quality Management District (SCAQMD) permitting survey. Please take a few minutes to complete these 10 questions. The identities of those completing the questionnaire will be kept confidential. This information will be used to help expedite the current permit processing system.

FACILITY BACKGROUND

How many employees does your company have in Southern California? 75+

What type of business is conducted by your firm? Mfg. chairs

How many years of experience do you have working with the SCAQMD? 20+

SCAQMD PERMITTING QUESTIONS

1. How many permit applications do you submit to SCAQMD each year? (3)

   Are they primarily administrative-type changes or Permits to Construct for new equipment? For yearly use

For questions 2 & 3, please check "Yes" or "No":	Yes	No
2. Would you be willing to pay an additional fee for expedited permit review?	☐	☒

What percentage of the current fee would you be willing to pay?

3. Have you ever used any of the following SCAQMD permitting services?

Permit assistance desk/operator	☐	☒
Small business assistance	☐	☒
Registered equipment permit processing	☐	☒
WARP system	☐	☒
AQMD website with permit applications and checklists	☐	☒

If yes for any of the above, what did you find helpful?

Not helpful?

4. What aspect of permit application preparation is the most difficult/time consuming? Filling out the forms, waiting for response

What could be done to reduce the time spent or the difficulty level of that portion of the process? Have AQMD assistance in filling out forms

5. What is your biggest frustration with the permitting process? Waiting many months for reply.

6. What is the shortest amount of time it has taken to receive a permit?

The longest? 6-7 mos.

The average? 4 mos.

What, if anything, caused delays in the process? Don't know

Were the delays related to problems internal, external or with the District? District

7. Has the District ever asked you to provide additional information to help process your application? No

If so, what type of information did they want?

8. How soon after you submit your permit are you contacted by the District? 6 mos.

9. What, if any, have been specific areas in the permit process that continually produce problems or delays in your pursuit of permits? ?

Can they be reduced or remedied? If so, how? ?

10. Do you have any additional suggestions for making the permit process more efficient? ?

INTERVIEW QUESTIONS FOR PERMIT APPLICANTS

Thank you for assisting with this South Coast Air Quality Management District (SCAQMD) permitting survey. Please take a few minutes to complete these 10 questions. The identities of those completing the questionnaire will be kept confidential. This information will be used to help expedite the current permit processing system.

FACILITY BACKGROUND

How many employees does your company have in Southern California? _____

What type of business is conducted by your firm? Newspaper Printing/Publishing

How many years of experience do you have working with the SCAQMD? 13

SCAQMD PERMITTING QUESTIONS

1. How many permit applications do you submit to SCAQMD each year? Approx. 1

   Are they primarily administrative-type changes or Permits to Construct for new equipment?
   Permits to construct

For questions 2 & 3, please check "Yes" or "No":	Yes	No
2. Would you be willing to pay an additional fee for expedited permit review? Only if I need an expedited review	☐	☐
What percentage of the current fee would you be willing to pay? 5%		
3. Have you ever used any of the following SCAQMD permitting services?		
Permit assistance desk/operator	☒	☐
Small business assistance	☐	☒
Registered equipment permit processing	☒	☐
WARP system	☐	☒
AQMD website with permit applications and checklists	☒	☐

If yes for any of the above, what did you find helpful? Permit assistance & website

Not helpful? None – I find that the AQMD is generally helpful

4. What aspect of permit application preparation is the most difficult/time consuming?
   1.) Technical
   2.) Fee & Form Determination

   What could be done to reduce the time spent or the difficulty level of that portion of the process? More straightforward rules; immediate assistance with fees & forms

5. What is your biggest frustration with the permitting process? If the fee isn't calculated properly, the entire permit package gets returned.

6. What is the shortest amount of time it has taken to receive a permit? 3 weeks

   The longest? 8 weeks

   The average? Approx. 4-6 weeks

   What, if anything, caused delays in the process? Backlogs; technical review

   Were the delays related to problems internal, external or with the District? Internal & District

7. Has the District ever asked you to provide additional information to help process your application? Yes

   If so, what type of information did they want? Additional process drawing & calculations

8. How soon after you submit your permit are you contacted by the District? 2-4 weeks

9. What, if any, have been specific areas in the permit process that continually produce problems or delays in your pursuit of permits? Small delays related to rule interpretation; fee determination; and appl. Form selection

Can they be reduced or remedied? If so, how? Yes, reduce the complexity of the fee structure; issue a one page list of all appl. Forms & equipment for which each applies.

10. Do you have any additional suggestions for making the permit process more efficient? Same as above.

INTERVIEW QUESTIONS FOR PERMIT APPLICANTS

Thank you for assisting with this South Coast Air Quality Management District (SCAQMD) permitting survey. Please take a few minutes to complete these 10 questions. The identities of those completing the questionnaire will be kept confidential. This information will be used to help expedite the current permit processing system.

FACILITY BACKGROUND

How many employees does your company have in Southern California? 950

What type of business is conducted by your firm? Hot and Cold Rolled Steel Products

How many years of experience do you have working with the SCAQMD? 5 yrs.

SCAQMD PERMITTING QUESTIONS

1. How many permit applications do you submit to SCAQMD each year? 2

   Are they primarily administrative-type changes or Permits to Construct for new equipment? Both types

For questions 2 & 3, please check "Yes" or "No":	Yes	No
2. Would you be willing to pay an additional fee for expedited permit review?	☒	☐

What percentage of the current fee would you be willing to pay? 25%

3. Have you ever used any of the following SCAQMD permitting services?

Permit assistance desk/operator	☐	☒
Small business assistance	☐	☒
Registered equipment permit processing	☐	☒
WARP system	☐	☒
AQMD website with permit applications and checklists	☒	☐

If yes for any of the above, what did you find helpful? The amount of information that's available

Not helpful? Some areas are restricted

4. What aspect of permit application preparation is the most difficult/time consuming? Explaining the processes or equipment operations to the District.

What could be done to reduce the time spent or the difficulty level of that portion of the process? More direct communications and site visits.

5. What is your biggest frustration with the permitting process? The never satisfied request for more information concerning the processes and equipment by the District

6. What is the shortest amount of time it has taken to receive a permit? 10 weeks

The longest? 9 months

The average? 4 months

What, if anything, caused delays in the process? Obtaining additional information from source testing and equipment manufacturers.

Were the delays related to problems internal, external or with the District? All three areas.

7. Has the District ever asked you to provide additional information to help process your application? Yes

If so, what type of information did they want? Source Testing and Equipment Information and Vendor Process Information

8. How soon after you submit your permit are you contacted by the District? Within two weeks

9. What, if any, have been specific areas in the permit process that continually produce problems or delays in your pursuit of permits? Communications and understanding of the Project by the District.

Can they be reduced or remedied? If so, how? Closer communications and site visits by District Engineers to view processes.

10. Do you have any additional suggestions for making the permit process more efficient? Deal with all the issues at the same time – not separately. Find a solution that's reasonable and ask only for the information needed.

INTERVIEW QUESTIONS FOR PERMIT APPLICANTS

Thank you for assisting with this South Coast Air Quality Management District (SCAQMD) permitting survey. Please take a few minutes to complete these 10 questions. The identities of those completing the questionnaire will be kept confidential. This information will be used to help expedite the current permit processing system.

FACILITY BACKGROUND

How many employees does your company have in Southern California? Approx. 150

What type of business is conducted by your firm? Landfill Maintenance & Operations

How many years of experience do you have working with the SCAQMD? 12

SCAQMD PERMITTING QUESTIONS

1. How many permit applications do you submit to SCAQMD each year? 2-10

   Are they primarily administrative-type changes or Permits to Construct for new equipment? Both

For questions 2 & 3, please check "Yes" or "No":	Yes	No
2. Would you be willing to pay an additional fee for expedited permit review?	☐	☒

   What percentage of the current fee would you be willing to pay?

3. Have you ever used any of the following SCAQMD permitting services?

Permit assistance desk/operator	☐	☒
Small business assistance	☐	☒
Registered equipment permit processing	☐	☒
WARP system	☐	☒
AQMD website with permit applications and checklists	☐	☒

If yes for any of the above, what did you find helpful?

Not helpful?

4. What aspect of permit application preparation is the most difficult/time consuming? None

What could be done to reduce the time spent or the difficulty level of that portion of the process? I do not see a problem with the process

5. What is your biggest frustration with the permitting process? AQMD personnel who cannot speak English clearly.

6. What is the shortest amount of time it has taken to receive a permit? 2 days

The longest? 3 months

The average? 1 month

What, if anything, caused delays in the process? Lack of information on app.

Were the delays related to problems internal, external or with the District? I have seen it all.

7. Has the District ever asked you to provide additional information to help process your application? Yes

If so, what type of information did they want? Always different

8. How soon after you submit your permit are you contacted by the District? Varies

9. What, if any, have been specific areas in the permit process that continually produce problems or delays in your pursuit of permits? Problems always vary depending on type of permit

   Can they be reduced or remedied? If so, how?

10. Do you have any additional suggestions for making the permit process more efficient?

INTERVIEW QUESTIONS FOR PERMIT APPLICANTS

Thank you for assisting with this South Coast Air Quality Management District (SCAQMD) permitting survey. Please take a few minutes to complete these 10 questions. The identities of those completing the questionnaire will be kept confidential. This information will be used to help expedite the current permit processing system.

FACILITY BACKGROUND

How many employees does your company have in Southern California? <500

What type of business is conducted by your firm? SIC 4512 Airline Transportation

How many years of experience do you have working with the SCAQMD? 5

SCAQMD PERMITTING QUESTIONS

1. How many permit applications do you submit to SCAQMD each year? 1-2

   Are they primarily administrative-type changes or Permits to Construct for new equipment? Administrative

For questions 2 & 3, please check "Yes" or "No":	Yes	No
2. Would you be willing to pay an additional fee for expedited permit review?	☐	☒

   What percentage of the current fee would you be willing to pay?

3. Have you ever used any of the following SCAQMD permitting services?

Permit assistance desk/operator	☐	☒
Small business assistance	☐	☒
Registered equipment permit processing	☒	☐
WARP system	☐	☒
AQMD website with permit applications and checklists	☒	☐

If yes for any of the above, what did you find helpful? Website

Not helpful?

4. What aspect of permit application preparation is the most difficult/time consuming? Amendments to modify an existing permit

What could be done to reduce the time spent or the difficulty level of that portion of the process? Eliminate the RECLAIM program

5. What is your biggest frustration with the permitting process? Long turn time in amending the permit

6. What is the shortest amount of time it has taken to receive a permit?

The longest? 2 months

The average? Several weeks

What, if anything, caused delays in the process? Small minor modifications are not given priority, but are required by regulation.

Were the delays related to problems internal, external or with the District?

7. Has the District ever asked you to provide additional information to help process your application?

If so, what type of information did they want? N/A

8. How soon after you submit your permit are you contacted by the District?

9. What, if any, have been specific areas in the permit process that continually produce problems or delays in your pursuit of permits? Complexity of rules, and the frequent modification of the regulations.

   Can they be reduced or remedied? If so, how?

10. Do you have any additional suggestions for making the permit process more efficient?

INTERVIEW QUESTIONS FOR PERMIT APPLICANTS

Thank you for assisting with this South Coast Air Quality Management District (SCAQMD) permitting survey. Please take a few minutes to complete these 10 questions. The identities of those completing the questionnaire will be kept confidential. This information will be used to help expedite the current permit processing system.

FACILITY BACKGROUND

How many employees does your company have in Southern California? 1040

What type of business is conducted by your firm? Manufacturing

How many years of experience do you have working with the SCAQMD? 8

SCAQMD PERMITTING QUESTIONS

1. How many permit applications do you submit to SCAQMD each year? 2-4

   Are they primarily administrative-type changes or Permits to Construct for new equipment? Both

For questions 2 & 3, please check "Yes" or "No":	Yes	No
2. Would you be willing to pay an additional fee for expedited permit review?	☒	☐

   What percentage of the current fee would you be willing to pay? 5-10%

3. Have you ever used any of the following SCAQMD permitting services?

Permit assistance desk/operator	☐	☒
Small business assistance	☐	☒
Registered equipment permit processing	☐	☒
WARP system	☐	☒
AQMD website with permit applications and checklists	☒	☐

If yes for any of the above, what did you find helpful? Website is easy to use.

Not helpful?

4. What aspect of permit application preparation is the most difficult/time consuming? Gathering equipment data.

What could be done to reduce the time spent or the difficulty level of that portion of the process?

5. What is your biggest frustration with the permitting process? Time

6. What is the shortest amount of time it has taken to receive a permit?

The longest?

The average?

What, if anything, caused delays in the process? Information supplied by Manufacturing Engineers

Were the delays related to problems internal, external or with the District? Internal

7. Has the District ever asked you to provide additional information to help process your application? No

If so, what type of information did they want?

8. How soon after you submit your permit are you contacted by the District? 4 weeks or so

9. What, if any, have been specific areas in the permit process that continually produce problems or delays in your pursuit of permits?

Can they be reduced or remedied? If so, how?

10. Do you have any additional suggestions for making the permit process more efficient? I really don't think it's that bad.

Appendix C

SOLUTION RATINGS BY CATEGORY

INSTRUCTIONS FOR RATING PERMIT STREAMLINING MEASURES

GENERAL

Each proposed permit streamlining measure is to be rated against each of 22 criteria, which are organized into six groups.

Most of the criteria are stated in terms of desirable changes to the permit processing system, e.g., "reduces processing time" or "increases accuracy of emission estimates." The measures are to be rated according to how well they would bring about these desirable changes. For the purpose of this rating exercise, assume in all cases, that each proposed measure is implemented completely and well. For example, if a measure includes development or improvement of data management software, assume that the new or revised program works properly and efficiently, and is user-friendly.

Each rating value must be a whole number between -3 and +3. The basis for each rating should be as follows:

Satisfies the criterion exceptionally well	3
Satisfies the criterion well	2
Barely satisfies the criterion	1
Has no effect, positive or negative	0

Exceptions for certain criteria are discussed below.

We suggest that you do the rating in two steps. First, rate each measure independently of all other measures (i.e. as if it were the only measure being considered). Then, if you feel it would be worthwhile, readjust some of your numbers to reflect your opinion about the relative merits of two or more measures. For example, suppose that you have given Measure A and Measure B both a "3" for "Reduces processing time." On further reflection, you see that Measure A would probably cut much more processing time than would Measure B. You would then reduce Measure B's rating to 2 or 1. *However, do not change any rating to intentionally affect the final score of any measure!*

SYSTEM EFFICIENCY CRITERIA

Reduces Processing Time: Decreases the *calendar days* between application submittal and permit issuance.

Reduces Labor Requirements: Decreases the number of person-hours required to process an application, by reducing the number of people needed and/or reducing the amount of time a given person needs.

Does Not Require Capital Investment and/or Software Development: This criterion should be applied as follows:

Does not require any capital investment or new software	3
Requires a minimal amount of investment and/or software	-1
Requires a moderate amount of investment and/or software	-2
Requires considerable investment and/or software	-3

Reduces Non-Labor Costs: Decreases costs allocable to processing, such as telephone, photocopying, mailing, computer time, etc.

CRITERIA FOR RESPONSIVENESS TO EXTERNAL CUSTOMERS

Decreases Applicants' Uncertainty About the Permitting Process: Give a higher rating to those measures that help applicants find out more easily about the status of their applications, to contact the right people without going through a half-dozen transfers, etc. Also rate highly those measures that let the applicant know in a timely manner whether the application is deficient or likely not to be approved.

Assures Consistency in Rule Interpretation: Give a higher rating to measures that minimize reliance upon individual engineers' interpretations of rule requirements.

Assures Equity in Treatment of Similar Sources: A highly rated measure should preclude cases in which requirements (e.g. BACT for internal combustion engines) vary among the District's processing units.

Facilitates Information Submittal: Give higher ratings to measures that allow applicants to submit information on a diskette or on-line. Note that this criterion is different from "Decreases Time and Resource Requirements for Applicant." (See below.)

Reduces Unnecessary, Unrealistic Permit Conditions: To receive a high rating, the measure should eliminate permit conditions that do nothing to accomplish the objectives of District rules. Measures are more convenient to the permit holder, yet still satisfy rule requirements, should also rate highly.

Reduces Time and Resource Requirements for Applicant: Give a high rating to measures that eliminate the requirement to submit information that (a) is of no practical use to the District and (b) costs the applicant much time and effort. Also rate highly those measures that would reduce the amount of "paperwork" (whether hard-copy or on-line) to be submitted.

CRITERIA FOR EFFECTIVENESS IN MEETING AIR QUALITY MANDATES

Reduces Actual Emissions: This criterion was inspired by the Texas Natural Resource Conservation Commission's practice of evaluating each issued permit to see whether staff's review (and suggested or mandated changes to the

application) resulted in a net decrease in emissions from what they would have been had the staff just issued the permit without a review. In this case, judge whether adopting the *permit processing measure* you are rating would, in the long term, reduce emissions. If you think that it would increase emissions, give it a negative value.

Increases Likelihood of Actual Compliance With Rules: This criterion recognizes the fact that some permittees do not really comply with all permit conditions, especially those that they perceive as useless or particularly burdensome (e.g. vapor leak inspections at dry cleaning plants). A highly-rated measure would make it easier to comply with the rules. (***Note**: this criterion overlaps somewhat with "Reduces Unnecessary, Unrealistic Permit Conditions." Avoid double-weighting by excluding the issue of permit conditions when applying this criterion.)*

CRITERIA FOR PROVISION OF SUPPORT TO OTHER AQMD PROGRAMS

Increases Accuracy of Emission Estimates: Give a high rating to measures that standardize and/or automate calculation of emissions, or that require submittal of more accurate, up-to-date information. Note that a measure rated highly under this criterion may rate low under some of the criteria associated with responsiveness to external customers.

Increases Accuracy of Fee Calculations: Rate highly those measures that allow quick, easy calculation of permit fees, and that eliminate ambiguity and uncertainty.

Eliminates Duplication of Data Gathering or Storage for Other Programs: To receive a high rating, a measure should provide for easy access to application data by other District programs.

CRITERIA FOR EASE OF IMPLEMENTATION

Does Not Require Staff Training: This criterion should be applied as follows:

Does not require any staff training	3
Requires a minimal amount of staff training	-1
Requires a moderate amount of staff training	-2
Requires considerable staff training	-3

Does Not Require Staff Reorganization: This criterion should be applied as follows:

Does not require any staff reorganization	3
Requires a minimal amount of staff reorganization	-1
Requires a moderate amount of staff reorganization	-2
Requires considerable staff reorganization	-3

Does Not Require Board Approval and/or New or Amended Rules: This criterion should be applied as follows:

Does not require Board approval or new or amended rules	3
Requires Board approval or new or amended rules	-3

Does Not Require a Change in the SIP: This criterion should be applied as follows:

Does not require a change in the SIP	3
Requires a change in the SIP	-3

Accommodates Changing Requirements Without Major Redesign: In this case, "redesign" means redesign of the measure being evaluated. If the provisions of the measure can easily be modified to reflect changes in rule requirements, District budgets, or other variables, rate it highly. If the measure can only be implemented under restricted circumstances, then give it a low rating.

CRITERIA FOR MANAGEMENT CONSIDERATIONS

Increases Employee Morale: If the measure would be readily accepted or even welcomed by employees (especially if it is something for which they have been asking), rate it highly. If it would appear to employees to be unfair or unduly burdensome, then give it a negative rating.

Increases Individual Responsibility: Give the measure a high rating if it gives more responsibility to individual engineers and managers for meeting time and quality requirements.

Solutions Sorted by Category

SOLUTIONS SORTED BY CATEGORY

Fees

Category	Solution	Score
Fees	1. Accountability/Fee Study • Record actual time spent on each application, so Fee Study group has actual data to average.	0.69
Fees	2. Assistance to applicant • Institute a Rule 301 hotline to help people calculate fees.	0.83
Fees	3. Incomplete Fees or Forms • Increase the penalty for incomplete applications as a deterrent.	0.88
Fees	4. Make fee applicability based on application postmark.	0.64
Fees	5. Efficient Check Processing • Remove checks from applications immediately and process them instead of holding them until after preprocessing or prescreening. • Immediately assign an application number to an application when received despite complete or fees. • Associate check with application given at time received (i.e. assign application number immediately upon reception). • Deposit check immediately upon receipt. • Do not put finance hold on application if total fees paid exceed fees due. • Automation of accounts receivable and CLASS system to enable automation of refund check processing.	0.67
Fees	6. Accept applications with 85% fee paid, 45 days for balance.	0.42
Fees	7. Allow electronic fund transfer credit cards, or Fax-A-Check for application fees to promote Internet application submittal (electronic prescreening, instant payment of fees).	0.38
Fees	8. Set up a debit account for qualified applicants to pay fees.	0.53
Fees	9. Include fee payment in loan guarantee programs.	-0.01
Fees	10. Renew operating permits every 5 years (reduce work for annual fees).	0.63

Fees	11. Guarantee a maximum time (7/30/180) for permit review and issuance. • Amend Rule 301 to allow applicants to pay a reasonable amount of additional fees in exchange for AQMD guaranteed permit delivery time, refundable if time is not met.	0.54
Fees	12. Make applications submitted by CPPs half price.	0.69
Fees	13. Recategorize the BCAT/CCATs within the Fee Schedule to better match the current processing cost.	0.43
Fees	14. Track status of applications with missing or incorrect fees.	0.47
Fees	15. Create a fee worksheet for the applicant (ease and standardization).	1.08

Permit Support Systems

Category	Solution	Score
Permit Support Systems	1. Require all applications to be submitted electronically; electronic 400A and 400 Ex forms can prevent acceptance unless complete. • Require all facilities who submit annual fee reports electronically to submit permit applications electronically. • Require all RECLAIM or Title V facilities to submit permit applications electronically. • Accept applications via fax or e-mail.	0.81
Permit Support Systems	2. Establish policy to make network PC- or Server-based.	0.72
Permit Support Systems	3. Make network PC-based to allow productivity (word processing and spreadsheets only) when network is down (which has not happened recently).	0.63
Permit Support Systems	4. Make network Server-based because there are plenty of PC and walk up stations, but when the server is off line e-mail, intranet, internet, Liberty, Central Information Repository database access to Ingres (finance, permitting, etc.) cannot be accessed.	0.70
Permit Support Systems	5. Create a LAN for each floor to minimize effect of one or more servers failing (work could be done off LAN instead of overall network, until network is stabilized).	0.61
Permit Support Systems	6. Allow funding to reconfigure network as needed (the increased stability over the past year occurred	0.76

	because of reconfiguration, but with so many new systems, WARP, FPPS, SSPS, RACER, electronic timecards, the system needs to have more flexibility in updating and reconfiguration.	
Permit Support Systems	7. Move to Microsoft NT • Upgrade to Microsoft NT (allows use of current MS application on the desktops such as outlook; updates to NT and Windows will upgrade netware; and better integration of network with desktops). • Replace Beyond Mail with Outlook (e-mail, scheduler, etc.) which is already on desktops (plus updates for Outlook come with MS operating systems, Beyond Mail upgrades must be purchased separately).	0.70
Permit Support Systems	8. Update web site more often, train more than one "web deputy".	0.56
Permit Support Systems	9. Place CPP policies on the web.	0.77
Permit Support Systems	10. Publicize list of manufacturers approved for the over-counter permits. • Place list of manufacturers approved for the over-counter permit process on the web. • Give permit services the list of manufacturers approved for the over-counter permits.	1.22
Permit Support Systems	11. Continue to load all application software to local hard drives on desktop computers (able to work when network is down).	0.81
Permit Support Systems	12. Add a keyword search capability in the PreScreening system (reduce time).	0.85
Permit Support Systems	13. Add a computer fix to prevent data entry staff from entering data that conflicts with information input by the SSC engineer (error reduction).	0.75
Permit Support Systems	14. Create a checklist per form for prescreeners to verify application completeness (add QA/QC).	1.22
Permit Support Systems	15. Create a computerized tutorial or expert system for filling out applications (education).	1.22
Permit Support Systems	16. Reduce redundant data entry by capturing data entered during prescreening in the database. • Have prescreeners enter what additional elements are required before approving permit. (BACT, source test, risk assessment, ERCS) so engineers do not have to reevaluate what is missing again when they receive the application.	0.96
Permit Support	17. Return all permitting databases to (BCAT/CCAT)	0.42

Systems	system.	
Permit Support Systems	18. BCAT/CCAT - eliminate assignment of these codes during permit processing.	0.76

Permit Support Systems	19. Provide search capabilities for BCAT/CCAT by number and description.	0.73
Permit Support Systems	20. Test CPPs • Require CPPs to periodically submit a mock application. (education, QA/QC) • The CPPs must pass predetermined level of completeness and accuracy to be recertified (education, QA/QC). • Record data on CPPs for better evaluation.	0.83
Permit Support Systems	21. Use "intelligent" SCC codes to identify equipment instead of BCAT/CCAT.	0.52
Permit Support Systems	22. Develop instructions for Tier I and Tier II for applications that require risk assessment and potentially will require Tier III. (If a facility greatly fails Tier II, it knows a Tier IV risk assessment is needed.)	0.99
Permit Support Systems	23. Establish AQMD permitting homepage (4.1.1 2) • Put links to technical data on AQMD web page (e.g. EPA AP-42). • Put default emission factors on the AQMD web page.	1.11
Permit Support Systems	24. Use imaging, electronic workflow and other IM technologies for a paperless system initially for simple then complex equipment.	0.72
Permit Support Systems	25. Accelerate WARP II implementation.	1.00
Permit Support Systems	26. Follow up on rejections letters. Were applications resubmitted, is the equipment operating unpermitted, or has the project been terminated?	0.51
Permit Support Systems	27. Allow more than one person the authority to reject applications (i.e. send out letters). Currently, only one persons is authorized	0.69
Permit Support Systems	28. Update BCAT/CCAT to consolidated instances of duplication to ensure the similar equipment BCAT/CCAT received the same fee.	0.69
Permit Support Systems	29. Update BCAT/CCAT (used by AQMD to calculate fees, not seen by public) to match Rule 301 (used by public). There have been credibility issues when fees do not match.	0.82
Permit Support Systems	30. Keep fee sheets current in database, data entry does half calculations manually from manually generated sheets because database is not updated.	0.98
Permit Support Systems	31. Search or drop down Zip Codes that are easily updated (as new ZIPs are added) in database to aid	0.67

	in processing and mailing.	

Permit Support Systems	32. Remove need for previous permit number at data entry level; just use application number to track and label new applications. Modifications and Change of Ownerships need previous permit number, before labels are made. Data entry people can't correlate, need engineers.	0.72
Permit Support Systems	33. Permanent Lobby Duty staff. Currently data entry staff take turns 2 days/month. Cannot do normal duties from lobby. Use staff that can interact with industry and answer questions and concerns.	0.99
Permit Support Systems	34. Give all staff ability to print e-mail. Some permit services staff cannot print out e-mail sent to them by engineers to attach to files.	0.82
Permit Support Systems	35. Create pamphlets to instruct on completing application forms.	0.94

Permit Processing

Category	Solution	Score
Permit Processing	1. Complete a users manual for CAPPs or replacement computer system.	0.94
Permit Processing	2. A permitting handbook should be updated for use by applicants and engineers; i.e. instruction booklet. (Standardization.) • Develop a Rule 1401 template. • Develop a Rule 1401 handbook for different equipment types or attach to new permit handbook.	1.49
Permit Processing	3. Limited Internet access • Modify the current security to allow all employees access to selected government internet sites (less time in library and research). • Have information management develop - intranet mirror of important sites.	1.04
Permit Processing	4. Allow full access to the internet and monitor activities.	0.93
Permit Processing	5. Develop PSD modeling and analysis methods (create educational document).	0.72
Permit Processing	6. Reprioritize, Require engineers to process applications in a certain order to ensure that lengthy or time-consuming processes are completed up front (BACT, emission offsets, health risk assessments, source tests, or public notification) (facilities may cancel application or alter if original	0.92

	application is non-compliant).	

Permit Processing	7. Treat relocations as modification not new facilities. • Exempt straight relocations from BACT requirements.	0.68
Permit Processing	8. Redefine "achieved-in-practice" for LAER and BACT to include only those installed to comply with air pollution regulations. • Refer BACT issue to BACT SRC re LAER determinations. • Reevaluate BACT/LAER issues for R1151 and other low emitting equipment. • LAER determined when application is deemed complete. • Empower BSRC, ombudsman.	0.67
Permit Processing	9. Training and certification of consultants. • Increase use of consultants to process application.	0.51
Permit Processing	10. Create task force to evaluate the risk of placing applications for equipment without a written permit on a lower priority than the applications for permit to construct before construction.	0.57
Permit Processing	11. Make applications for equipment without a written permit a higher priority than applications for permit to construct before construction because potential violation is high.	0.78
Permit Processing	12. Create a separate division to handle equipment without a written permit to insure that these permits do not hold up applications filed before construction or modification.	0.62
Permit Processing	13. Develop training and cross training programs	0.95
Permit Processing	14. Place incomplete applications in low priority.	0.39
Permit Processing	15. Have specialized staff for various source categories.	1.04
Permit Processing	16. Develop a BACT manual (education, standardization). • Publish BACT guide lines as they become available on the web. • Publish new version of BACT guidelines. • Implement BACT review committee to finalize actions.	1.21
Permit Processing	17. Create an automated computer expert system (ACES) to assist permit processing and keep data on unique equipment.	1.00

Permit Processing	18. Add QA/QC and editing functions to CAPPS or replacement system.	0.75
Permit Processing	19. Upgrade CAPPs to Windows based system.	0.66
Permit Processing	20. Bifurcate NSR permitting for major and non-major sources.	0.32
Permit Processing	21. Improve NSR module/procedures, data should automatically be copied over to new applications for all administrative change applications.	0.91
Permit Processing	22. Rule 1401 - drastically simplify Rule 219 requirements, allow satisfying Tier 2 as a means to have equipment remain Rule 219 exempt.	1.18
Permit Processing	23. Create forum to resolve inconsistencies and polices between units. Part of lack of standardization is lack of forum to interact and compare policies and standards.	1.14
Permit Processing	24. Train staff on Rules. Summaries of impacts of rule changes on permit process. (e.g. restore Rule Interpretation Group).	0.82
Permit Processing	25. Designate team to update NSR.	0.46
Permit Processing	26. Require engineers to attend certain number of field evaluations to increase experience. Engineering and rule evaluations are desk jobs now, reducing actual hands-on experience.	0.93
Permit Processing	27. Archive facility permit information. Information is lost electronically during modification. Previous evaluations or changes are not known to current evaluating engineers.	0.74
Permit Processing	28. Have permit services send out facility permits like regular permits. Facility permits are sent out by units, therefore no secondary quality control is completed.	0.35
Permit Processing	29. Have RECLAIM applications scanned or filed with Records. Currently files are kept with engineers.	0.71
Permit Processing	30. Allow facility permits to be printed in parts, currently only whole permit can be printed.	0.84
Permit Processing	31. Assign a team to investigate the amount of time spent acquiring information for incomplete applications. (Fee Schedule Analysis)	0.64

Work Flow

Category	Solution	Score

Work Flow	1. Develop policy of pre-application meetings.	1.39
Work Flow	2. Create pre-application forms.	1.51
Work Flow	3. Permanent group of "meeters" provide answers within 24 hours or permit fee is waived, must stick to answer or permit fee waived; promote consistency.	1.24
Work Flow	4. Engineers should be allowed to prescreen from their desks (so information is available when applicants call back.	1.08
Work Flow	5. Have full-time prescreeners to increase consistency.	0.92
Work Flow	6. Make prescreening the key position. • Add incentives to become a prescreener (increased pay or title for this as a full time position).	0.89
Work Flow	7. Change prescreen policy to one phone call, not three.	0.87
Work Flow	8. Assign a person responsible for resolving applications held in prescreening more than 7 days.	0.93
Work Flow	9. Limit the amount of time an application can remain in the prescreening process before automatically rejected.	0.94
Work Flow	10. Create team to Reevaluate Prescreening process.	0.44
Work Flow	11. Create a detailed criteria for rejecting permits.	1.16
Work Flow	12. Return incomplete applications immediately with explanations. • Applications screened for major omissions when submitted and immediately rejected if omissions are found.	0.97
Work Flow	13. Prescreening – eliminate, transfer responsibilities to processing engineers. • Let individual units receive and issue permits (i.e. eliminate permit processing and prescreening.	0.89
Work Flow	14. Create a precertified module for emergency ICEs.	1.10
Work Flow	15. Have expedited permitting for minor sources.	0.94
Work Flow	16. Have an appeals process for expedited permitting.	0.07
Work Flow	17. Expand PR222 Registration concept to include additional area sources.	0.60
Work Flow	18. Registration or Permit-By-Rule. • Issue over-the-counter (or Internet) Permit to Construct Registration for any equipment for which a P/C Registration Protocol is developed. • Consider Certification and Registration (C&R). • Register small sources rather than submitting them to the standard permit process (reduce amount of time).	1.02

	• Issue general permits for classes of sources. Register any equipment for which a P/C Registration Protocol is developed. • Encourage more manufacturers to certify equipment instead of requiring end-users to get permit (like R1111, 1121, 1146.2). • Establish and execute more equipment to be precertified. • Fund expansion of over-the-counter permitting.	
Work Flow	19. Develop an Accelerated Permit Program (APP) to allow a qualifying air pollution source or abatement device to be installed and operated under a temporary permit to operate.	0.61
Work Flow	20. Create satellite permitting centers.	0.36
Work Flow	21. Green carpet program.	0.86
Work Flow	22. Accept all applications whether complete or not.	0.12
Work Flow	23. Limit the number of rejected applications, because applications are submitted incomplete because facilities are not familiar enough with regulations or lack adequate technical ability to complete applications.	0.39
Work Flow	24. Umbrella Permit (UP).	0.40
Work Flow	25. Tiered Emission Packages (TEP).	0.45
Work Flow	26. Consolidation (facility permits) into one program.	0.42
Work Flow	27. Consolidated permitting schedule for all sources within a facility.)	0.62
Work Flow	28. Deem complete/incomplete in less than 30 days.	0.89
Work Flow	29. Reevaluate 7/30/180 designation, prioritize based on current requirements (e.g. 7/60/120). 180-day designation is no longer a required limit but 120-day designation is a regulatory standard. • Reevaluate 7/30/180 designation against the actual time it takes to process permits. • More realistic designations and additional categories (14/30/75/120).	0.63
Work Flow	30. Create penalty for failure of District to meet 7/30/180 designation.	0.84
Work Flow	31. Combined authority to construct and permit to operate for sources that do not have to be source tested. (Table 4-1)	0.96
Work Flow	32. Have prescreeners reject applications that are missing additional required reports or information (BACT, source test, risk assessment, ERCS).	1.08
Work Flow	33. Have prescreeners send out letters to applicants that need BACT, source test, risk assessment,	0.91

	ERCs.	
Work Flow	34. Authorize direct access to application files for CPPs.	0.75
Work Flow	35. Fourteen day turnaround for CPP applications.	0.82

Work Flow	36. Open Records Section to permit processing staff at all times. (Currently only open during business hours). • Open Records Section to express permit processing staff at all times.	0.74
Work Flow	37. Data entry staff to work directly within unit (i.e. instead of in permit services).	0.64
Work Flow	38. Divide permit services among engineering divisions and departments.	0.50
Work Flow	39. Eliminate the RECLAIM program and fold regulatory requirements from RECLAIM into other programs.	0.30
Work Flow	40. Renegotiate with EPA the designation of Extreme Ozone Non-attainment based on the new 8-hr ozone standards.	0.39
Work Flow	41. Consider spray booth replacement as a modification. If the basic coating operation is not changed and emissions are not increased, BACT should not be triggered.	0.94
Work Flow	42. Amend Reg. 17 (PSD) to level with federal program and temporarily suspend PSD delegation while Reg. 17 is being amended.	0.30
Work Flow	43. Amend Rule 219 to exempt standardized *de minimis* emission levels.	1.10
Work Flow	44. Tie the CLASS system to integrated Voice Response (VR) for applicants to check status of application. Do the same with the Internet. (	0.64
Work Flow	45. Develop intranet system for improving internal communication.	0.84
Work Flow	46. Issue general permits such as those of the Commonwealth of Pennsylvania, Department of Environmental Protection (PADEP).	0.52
Work Flow	47. Covert Liberty to intranet (currently on network) to expand the number of users and increase access speed.	0.81
Work Flow	48. Hire consultant to review security measures in Ingres Database and provide suggestions to automate system. • Review Ingres Database security every time a large program like FPPS/SSPS is added. (4.1.5. Network Security-Ingres Database Updates)	0.50
Work Flow	49. Add entire permit process to after hour express permit processing not just the permit evaluation engineers.	0.65
Work Flow	50. Create team to find the largest bottlenecks and	0.93

	apply express processing to those areas.	

Work Flow	51. Establish facility permit processing software (FPPS) Explore commercially available software packages for AQMD or permit applicant use.	0.69
Work Flow	52. Clarify responsibilities between engineers and data entry on RECLAIM/facility change of ownership.	0.75

Tracking

Category	Solution	Score
Tracking	1. Systematically correct all data errors in tracking system.	0.70
Tracking	2. Develop standard permits with basic equipment minimum requirements.	1.10
Tracking	3. Develop a method to track source test, risk assessments, and CEQA reports electronically that is tied to the application number, so that the engineer knows if such documents have been received and where to find them. • Develop a database management system to track location of the applications between locations and notify managers electronically. • Track all permit applications in database; immediate ID assignment. • Use bar codes for tracking. • Bar-code permit application folders. • • Use bar codes to track all application related material such as source test, risk assessments, CEQA, etc. (currently applicants complain that District loses supporting documents). (• Add a way to associate electronically the permit or application number as part of each transaction. (less confusion, numbers assigned by prescreening now.)	1.10
Tracking	4. Do not use bar codes because it has the same limits as the current electronic system which tracks applications based on database activity.	0.52
Tracking	5. Minimize duplication ID creation by giving applicant preprinted labels for 400A.	0.76
Tracking	6. Assign a team to investigate the wide disparity in the time to process similar equipment between the units. Apply streamlining techniques used by the more efficient unit to the other units and post practices to increase standardization. (Fee	1.05

	Schedule Analysis)	
Tracking	7. Assign a team to investigate the amount of time and effort required to modify or change conditions on a permit. Engineers have complained that the historical and new research are unavailable or not useful. (Fee Schedule Analysis)	0.87
Tracking	8. Assign a unique number to each piece of permitted equipment and store all historical data under the equipment number, currently historical data has to be traced from modification to modification (each request can take a day). This would allow equipment to be traced if sold or relocated (i.e. inter-facility tracking).	1.11
Tracking	9. Accountability/Tracking • Implement a project management program for applications; one engineer performs all the analyses; assumes accountability. • Project sheets - use application numbers as code numbers (30-minute increments). • Connect projects sheets with timecard system (new system is capable). • Use capabilities of PeopleSoft to track time spent on applications. (Fee Schedule Analysis) • Track time on timecards spent on applications (same bar code).	1.05
Tracking	10. Develop aging reports for managers, supervisors and engineers.	0.72
Tracking	11. Track when permits are sent out. Engineers do not know where permits are after printing.	0.62

Forms

Category	Solution	Score
Forms	1. Redesign Form 400A ; remove Title V information from 400A.	0.68
Forms	2. Redesign Form 400A divide the non-Title V 400A into two parts, one for facility and company information, one for information on equipment.	0.65
Forms	3. Simplify permit application forms. • Revise forms color code information that is mandatory or application is rejected automatically. • Place wording on 400A Form that states that application will be rejected if entire form is not completed.	1.01

	• Include a checklist of required information with application. • Create permit application forms that are easy to read (font on current forms is too small). • Have more precertified equipment to qualify for registration. • Ensure that application forms and data entry programs include the essential information and organization in a consistent, logical, efficient and easy-to-use manner.	
Forms	4. Standardize permit application forms. • Customize more application packages similar to service stations with a predefined fee schedule. • Have one department in charge of forms so that changes are not made as often. • Insure that IM has input on forms because databases and applications are based on forms. • Require that all departments agree on any change to forms to prevent the forms from changing as often and ensure that important fields are not dropped. • Develop form EX which will flag equipment types that automatically require source test, BACT or risk assessment (e.g. Boilers over x mmbtu/hr need BACT, boilers over x mmbtu/hr BACT and source test, chrome tanks over x ft2 need risk assessment, etc.).	1.27
Forms	5. Equipment oriented Title V • Staple existing permits and add EPA requirements for Title V (Equipment based permit processing philosophy). • Staple existing permits after re-entered and stored to save for future Title V changes and add EPA requirements for Title V (Equipment based permit processing philosophy).	0.72
Forms	6. Standardize application format for CPPs.	0.93
Forms	7. Give the CPPs the same forms and guidelines that the engineering staff uses.	1.32
Forms	8. Send facilities the “inspectors view” Title V permit (all wording and conditions per permit unit on one form.	0.84
Forms	9. Develop and implement a Form 400-CEQA to be completed by applicants.	0.70

Forms	10. Examples, i.e. Prefilled out forms	1.02

Interactions

Category	Solution	Score
Interactions	1. Improve coordination with other local, state or federal agencies • in building permits. • facility inspections • contaminated soil clean-up. • underground tanks inspections.	0.52
Interactions	2. Improve coordination with economic development corporations and small businesses in explaining the permit process.	0.85
Interactions	3. Require engineers to screen for CEQA, not applicants. • Maintain single CEQA question on forms. (	0.58
Interactions	4. Add additional CEQA questions to the existing 400A.	0.59
Interactions	5. Designate an engineer with source testing experience to each unit.	0.95
Interactions	6. Develop training and cross training programs across permitting, source test, health risk assessment.	0.99
Interactions	7. Have IM present streamlining team with on-line capabilities and planned additions. • Keep same team of engineers and District streamlining members throughout the duration of long and major IM projects (changes to the personnel often cause the retraining of new members and redesign of newly programmed systems to please new team not necessarily because changes are beneficial. • Train users that interact with IM with the processes in question, especially teams that have input on large systems (it is unwise to have managers who do not use the system critique the system). • Develop system to keep IM informed, policies need to systematized and give to IM else they will not be incorporated or planed for in the design and program of new and existing systems.	0.88
Interaction	8. Create a division that fields compliance and planning issues for industry that is not tied to enforcement (Allows anonymous questions).	0.76
Interaction	9. Present and describe the permit process	0.63

	(sequence) to industry to help them understand the process.	
Interaction	10. Present to the public the legal and practical implications of certain processes: HRA (screening refined), BACT, etc. to help them better plan, redesign or cancel plans before submitting applications.	0.96
Interaction	11. Have IM show substantive changes to programs, i.e. training on where and how to use these changes.	0.79

Management

Category	Solution	Score
Management	1. Provide CPPs consultation space at AQMD (free or cost).	0.85
Management	2. Remove "three strikes" policy for CPPs.	0.90
Management	3. Define “three strikes” against CPPs.	0.75
Management	4. Standardization • Standardize exemptions and standards for risk assessments (especially for common equipment). • Place standard conditions into database that is accessible to all engineers. • Capture permit wording and conditions on network (currently only on desktop). • Collect existing permit wording and conditions from desktops and place into network. • Have database pull most common conditions per application type (BCAT/CCAT) to limit the amount of search time for standard conditions. • Make all condition additions to database through one or a team of people to retain standardization. • Have desktop computers flag repeated common conditions for submittal to standard condition pool.	1.32
Management	5. Posting of Standards • Place permitting policies and procedures on Intranet. • Place equipment-specific permit application instructions to include all requirements, methods to determine compliance and standard conditions on Intranet. • Place standard engineering evaluation protocol including equipment descriptions, background, process description, emission calculations, rule	1.41

	evaluation, permit conditions on Intranet. • Place standard permits and conditions for frequently permitted equipment on Intranet. • Create consistent standard policies and procedures for all evaluation teams or groups. • Document all policy decisions and post electronically.	
Management	6. Allow engineers to add conditions to the standard conditions as needed.	0.89
Management	7. Increase training and incentives for staff engineers, consultants and businesses to improve applications policy consistency.	1.09
Management	8. Contract engineers or specialized staff for unique assignments.	0.72
Management	9. Dugout processing sessions.	0.67
Management	10. Inspectors evaluate non-permitted sources.	0.19
Management	11. Have multilingual staff.	0.38
Management	20. Hire consultants to critique business practices.	0.65
Management	12. Use data technicians to work on Facility permit revisions and administrative modifications.	0.64
Management	13. Implement an emissions reduction analysis test for applications.	0.26
Management	14. Allow flexible work hours including 5/8 week, job sharing, etc. to maximize available permit engineering hours and provide different after hour express permitting time.	0.69
Management	15. Decide ideology moving all permits toward facility type permits, or toward single permit unit permits (policies tend to swing back and forth undoing each other).	0.80
Management	16. Require managers to submit business plans for their divisions. • Require business plans to include efficiency and cost reduction. • Hold managers accountable to business plans.	1.06
Management	17. Budget unit money based on business plan projections.	0.71
Management	18. Reduce QA/QC load by standardization of permit process.	1.11
Management	19. Hire management that have proven management skills.	0.93
Management	21. Reward units or divisions that better business practices.	1.16
Management	22. Monitor phone conversations with public for quality	0.57

	assurance.	
Management	23. Develop rotating audits to help reinforce management goals.	0.92
Management	24. Promote customer satisfaction for internal and external clients, through feedback forms. • Provide a formal means for feedback from industry on the Permit Processing. (Table 4-1)	0.83
Management	25. Provide management and productivity skill classes.	0.81
Management	26. Develop management by objectives reviews in which employees set goals and growth plans with superiors.	0.82
Management	27. Require management and productivity skill classes for employees that are not meeting goals agreed to by employee and supervisors in previous reviews.	0.80
Management	28. Use TQM system (e.g. ISO 9000, 14000) for continuous improvement.	0.82
Management	29. Conduct brainstorming session with AQMD with applicants.	0.74

Solutions With Criteria Averaged Rating

SOLUTIONS WITH CRITERIA AVERAGE RATING

Fees

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Fees	15. Create a fee worksheet for the applicant (ease and standardization).	26.25	19.33	0	9.33	48.8	4	1.08
Fees	3. Incomplete Fees or Forms • Increase the penalty for incomplete applications as a deterrent.	36.25	1.33	4.5	4.00	34.4	8	0.88
Fees	2. Assistance to applicant • Institute a Rule 301 hotline to help people calculate fees.	6.25	25.33	6	9.33	29.6	6	0.83
Fees	1. Accountability/Fee Study • Record actual time spent on each application, so Fee Study group has actual data to average.	22.5	10.67	1.5	6.67	28	0	0.69
Fees	12. Make applications submitted by CPPs half price.	15	2.67	1.5	5.33	34.4	10	0.69
Fees	5. Efficient Check Processing • Remove checks from applications immediately and process them instead of holding them until after pre-processing or pre-screening. • Immediately assign an application number to an application when received despite complete or fees. • Associate check with application given at time received (i.e. assign application number immediately upon reception). • Deposit check immediately upon receipt. • Do not put finance hold on application if total fees paid exceed fees due. • Automation of accounts receivable	26.25	10.67	0	0.67	24.8	5	0.67

	and CLASS system to enable automation of refund check processing.							
Fees	4. Make fee applicability based on application postmark.	6.25	8.00	4.5	4.67	40.8	0	0.64
Fees	10. Renew operating permits every 5 years (reduce work for annual fees).	31.25	10.00	0	5.33	15.2	1	0.63
Fees	11. Guarantee a maximum time (7/30/180) for permit review and issuance. • Amend Rule 301 to allow applicants to pay a reasonable amount of additional fees in exchange for AQMD guaranteed permit delivery time, refundable if time is not met.	22.5	5.33	0	0.00	20.8	5	0.54
Fees	8. Set up a debit account for qualified applicants to pay fees.	11.25	7.33	4.5	4.67	23.2	2	0.53
Fees	14. Track status of applications with missing or incorrect fees.	2.5	3.33	0	0.67	40.8	0	0.47
Fees	13. Re-categorize the BCAT/CCATs within the Fee Schedule to better match the current processing cost.	1.25	7.33	0	7.33	24	3	0.43
Fees	6. Accept applications with 85% fee paid, 45 days for balance.	7.5	7.33	-1.5	2.67	23.2	3	0.42
Fees	7. Allow electronic fund transfer credit cards, or Fax-A-Check for application fees to promote Internet application submittal (electronic prescreening, instant payment of fees).	8.75	12.67	0	2.00	12	3	0.38
Fees	9. Include fee payment in loan guarantee programs.	-21.25	2.00	0	1.33	16.8	0	-0.01

Permit Support Systems

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Permit Support Systems	10. Publicize list of manufacturers approved for the over-counter permits. • Place list of manufacturers approved for the over-counter permit process on the web. • Give permit services the list of manufacturers approved for the over-counter permits.	13.75	32.67	12	9.33	50.4	4	1.22
Permit Support Systems	14. Create a checklist per form for pre-screeners to verify application completeness (add QA/QC).	22.5	28.00	6	9.33	48	8	1.22
Permit Support Systems	15. Create a computerized tutorial or expert system for filling out applications (education).	32.5	18.00	6	6.67	50.4	8	1.22
Permit Support Systems	23. Establish AQMD permitting homepage • Put links to technical data on AQMD web page (e.g. EPA AP-42). • Put default emission factors on the AQMD web page.	17.5	22.00	6	10.00	49.6	6	1.11
Permit Support Systems	25. Accelerate WARP II implementation.	21.25	16.67	1.5	6.67	48	6	1.00
Permit Support Systems	22. Develop instructions for Tier I and Tier II for applications that require risk assessment and potentially will require Tier III. (If a facility greatly fails Tier II, it knows a Tier IV risk assessment is needed.)	16.25	20.67	6	3.33	48	5	0.99

Permit Support Systems	33. Permanent Lobby Duty staff. Currently data entry staff take turns 2 days/month. Cannot do normal duties from lobby. Use staff that can interact with industry and answer questions and concerns.	15	16.67	4.5	6.67	47.2	9	0.99
Permit Support Systems	30. Keep fee sheets current in database, data entry does half calculations manually from manually generated sheets because database is not updated.	28.75	4.67	0	7.33	52.8	4	0.98
Permit Support Systems	16. Reduce redundant data entry by capturing data entered during prescreening in the database. • Have pre-screeners enter what additional elements are required before approving permit. (BACT, source test, risk assessment, ERCS) so engineers do not have to re-evaluate what is missing again when they receive the application.	30	10.67	0	4.67	41.6	9	0.96
Permit Support Systems	35. Create pamphlets to instruct on completing application forms.	11.25	18.67	4.5	5.33	51.2	3	0.94
Permit Support Systems	12. Add a keyword search capability in the Pre-Screening system (reduce time).	25	0.67	0	3.33	48	8	0.85
Permit Support Systems	20. Test CPPs • Require CPPs to periodically submit a mock application. (education, QA/QC) • The CPPs must pass predetermined level of completeness and accuracy to be re-certified (education, QA/QC). • Record data on CPPs for better evaluation.	7.5	18.00	6	9.33	35.2	7	0.83

Permit Support Systems	29. Update BCAT/CCAT (used by AQMD to calculate fees, not seen by public) to match Rule 301 (used by public). There have been credibility issues when fees do not match.	15	3.33	0	2.00	53.6	8	0.82
Permit Support Systems	34. Give all staff ability to print e-mail. Some permit services staff cannot print out e-mail sent to them by engineers to attach to files.	10	16.00	3	7.33	43.2	2	0.82
Permit Support Systems	1. Require all applications to be submitted electronically; electronic 400A and 400 Ex forms can prevent acceptance unless complete. • Require all facilities who submit annual fee reports electronically to submit permit applications electronically. • Require all RECLAIM or Title V facilities to submit permit applications electronically. • Accept applications via fax or e-mail.	27.5	17.33	1.5	9.33	20.8	5	0.81
Permit Support Systems	11. Continue to load all application software to local hard drives on desktop computers (able to work when network is down).	22.5	-1.33	0	2.67	47.2	10	0.81
Permit Support Systems	9. Place CPP policies on the web.	5	6.67	6	4.67	53.6	1	0.77
Permit Support Systems	6. Allow funding to reconfigure network as needed (the increased stability over the past year occurred because of reconfiguration, but with so many new systems, WARP, FPPS, SSPS, RACER, electronic timecards, the system needs to have more flexibility in updating and reconfiguration.	20	-0.67	0	0.67	50.4	6	0.76
Permit Support Systems	18. BCAT/CCAT - eliminate assignment of these codes during permit processing.	17.5	2.67	0	4.00	42.4	9	0.76
Permit	13. Add a computer fix to prevent data entry	15	0.67	0	0.67	52	7	0.75

Support Systems	staff from entering data that conflicts with information input by the SSC engineer (error reduction).							
Permit Support Systems	19. Provide search capabilities for BCAT/CCAT by number and description.	16.25	2.00	0	2.67	44.8	7	0.73
Permit Support Systems	2. Establish policy to make network PC- or Server-based.	13.75	1.33	0	1.33	53.6	2	0.72
Permit Support Systems	24. Use imaging, electronic workflow and other IM technologies for a paperless system initially for simple then complex equipment.	18.75	4.00	0	3.33	37.6	8	0.72
Permit Support Systems	32. Remove need for previous permit number at data entry level; just use application number to track and label new applications. Modifications and Change of Ownerships need previous permit number, before labels are made. Data entry people can't correlate, need engineers.	27.5	7.33	0	4.00	28.8	4	0.72
Permit Support Systems	4. Make network Server-based because there are plenty of PC and walk up stations, but when the server is off line e-mail, intranet, internet, Liberty, Central Information Repository database access to Ingres (finance, permitting, etc.) cannot be accessed.	13.75	3.33	0	5.33	37.6	10	0.70

Permit Support Systems	7. Move to Microsoft NT • Upgrade to Microsoft NT (allows use of current MS application on the desktops such as outlook; updates to NT and Windows will upgrade netware; and better integration of network with desktops). • Replace Beyond Mail with Outlook (e-mail, scheduler, etc.) which is already on desktops (plus updates for Outlook come with MS operating systems, Beyond Mail upgrades must be purchased separately).	16.25	4.00	0	4.67	33.6	11	0.70
Permit Support Systems	27. Allow more than one person the authority to reject applications (i.e. send out letters). Currently, only one persons is authorized	12.5	6.67	1.5	7.33	38.4	3	0.69
Permit Support Systems	28. Update BCAT/CCAT to consolidated instances of duplication to ensure the similar equipment BCAT/CCAT received the same fee.	28.75	-3.33	3	0.00	34.4	6	0.69
Permit Support Systems	31. Search or drop down Zip Codes that are easily updated (as new ZIPs are added) in database to aid in processing and mailing.	8.75	2.67	0	0.67	52	3	0.67
Permit Support Systems	3. Make network PC-based to allow productivity (word processing and spreadsheets only) when network is down (which has not happened recently).	7.5	3.33	0	1.33	40.8	10	0.63
Permit Support Systems	5. Create a LAN for each floor to minimize effect of one or more servers failing (work could be done off LAN instead of overall network, until network is stabilized).	8.75	4.00	0	4.67	33.6	10	0.61
Permit Support Systems	8. Update web site more often, train more than one “web deputy”.	3.75	8.00	7.5	0.67	32.8	3	0.56

Permit Support Systems	21. Use "intelligent" SCC codes to identify equipment instead of BCAT/CCAT.	2.5	5.33	0	7.33	35.2	2	0.52
Permit Support Systems	26. Follow up on rejections letters. Were applications resubmitted, is the equipment operating unpermitted, or has the project been terminated?	-10	5.33	9	2.00	40	5	0.51
Permit Support Systems	17. Return all permitting databases to (BCAT/CCAT) system.	-1.25	0.67	0	2.67	39.2	1	0.42

Permit Processing

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Permit Processing	2. A permitting handbook should be updated for use by applicants and engineers; i.e. instruction booklet. (Standardization.) • Develop a Rule 1401 template. • Develop a Rule 1401 handbook for different equipment types or attach to new permit handbook.	38.75	36.00	9	13.33	40	12	1.49
Permit Processing	16. Develop a BACT manual (education, standardization). • Publish BACT guide lines as they become available on the web. • Publish new version of BACT guidelines. • Implement BACT review committee to finalize actions.	23.75	26.67	10.5	6.67	45.6	8	1.21
Permit Processing	22. Rule 1401 - drastically simplify Rule 219 requirements, allow satisfying Tier 2 as a means to have equipment remain Rule 219 exempt.	40	26.67	10.5	1.33	34.4	5	1.18
Permit Processing	23. Create forum to resolve inconsistencies and polices between units. Part of lack of standardization is lack of forum to interact	23.75	24.67	7.5	5.33	43.2	10	1.14

	and compare policies and standards.							
Permit Processing	3. Limited Internet access • Modify the current security to allow all employees access to selected government internet sites (less time in library and research). • Have information management develop - intranet mirror of important sites.	21.25	20.00	6	8.67	35.2	13	1.04
Permit Processing	15. Have specialized staff for various source categories.	32.5	3.33	3	5.33	45.6	14	1.04
Permit Processing	17. Create an automated computer expert system (ACES) to assist permit processing and keep data on unique equipment.	25	32.67	3	16.67	16.8	6	1.00
Permit Processing	13. Develop training and cross training programs	17.5	20.67	7.5	6.67	30.4	12	0.95
Permit Processing	1. Complete a users manual for CAPPs or replacement computer system.	31.25	6.67	0	2.67	44	9	0.94
Permit Processing	4. Allow full access to the internet and monitor activities.	16.25	16.00	4.5	5.33	38.4	13	0.93
Permit Processing	26. Require engineers to attend certain number of field evaluations to increase experience. Engineering and rule evaluations are desk jobs now, reducing actual hands-on experience.	18.75	3.33	6	6.00	45.6	13	0.93
Permit Processing	6. Re-prioritize, Require engineers to process applications in a certain order to ensure that lengthy or time-consuming processes are completed up front (BACT, emission offsets, health risk assessments, source tests, or public notification) (facilities may cancel application or alter if original application is non-compliant).	32.5	10.00	3	0.67	37.6	8	0.92
Permit Processing	21. Improve NSR module/procedures, data should automatically be copied over to new applications for all administrative change applications.	23.75	6.67	1.5	5.33	47.2	7	0.91
Permit Processing	30. Allow facility permits to be printed in parts, currently only whole permit can be printed.	20	6.00	0	0.67	53.6	4	0.84
Permit	24. Train staff on Rules. Summaries of	21.25	16.67	9	3.33	25.6	6	0.82

Processing	impacts of rule changes on permit process. (e.g. restore Rule Interpretation Group).							
Permit Processing	11. Make applications for equipment without a written permit a higher priority than applications for permit to construct before construction because potential violation is high.	8.75	2.00	13.5	0.00	51.2	3	0.78
Permit Processing	18. Add QA/QC and editing functions to CAPPS or replacement system.	20	10.67	0	3.33	32	9	0.75
Permit Processing	27. Archive facility permit information. Information is lost electronically during modification. Previous evaluations or changes are not known to current evaluating engineers.	11.25	5.33	1.5	5.33	46.4	4	0.74
Permit Processing	5. Develop PSD modeling and analysis methods (create educational document).	11.25	14.67	6	2.00	29.6	8	0.72
Permit Processing	29. Have RECLAIM applications scanned or filed with Records. Currently files are kept with engineers.	7.5	5.33	0	2.00	52.8	3	0.71
Permit Processing	7. Treat re-locations as modification not new facilities. • Exempt straight re-locations from BACT requirements.	32.5	22.00	-3	0.00	12.8	4	0.68
Permit Processing	8. Redefine "achieved-in-practice" for LAER and BACT to include only those installed to comply with air pollution regulations. • Refer BACT issue to BACT SRC re LAER determinations. • Re-evaluate BACT/LAER issues for R1151 and other low emitting equipment. • LAER determined when application is deemed complete. • Empower BSRC, ombudsman.	15	22.00	7.5	2.67	11.2	9	0.67
Permit Processing	19. Upgrade CAPPs to Windows based system.	13.75	0.00	0	1.33	41.6	9	0.66
Permit Processing	31. Assign a team to investigate the amount of time spent acquiring information for incomplete applications. (Fee Schedule	6.25	4.00	4.5	0.00	44	5	0.64

	Analysis)							
Permit Processing	12. Create a separate division to handle equipment without a written permit to insure that these permits do not hold up applications filed before construction or modification.	12.5	3.33	9	0.00	35.2	2	0.62
Permit Processing	10. Create task force to evaluate the risk of placing applications for equipment without a written permit on a lower priority than the applications for permit to construct before construction.	8.75	0.67	6	0.00	38.4	3	0.57
Permit Processing	9. Training and certification of consultants. • Increase use of consultants to process application.	21.25	1.33	1.5	2.00	28	-3	0.51
Permit Processing	25. Designate team to update NSR.	12.5	6.67	7.5	2.67	14.4	2	0.46
Permit Processing	14. Place incomplete applications in low priority.	6.25	-5.33	-7.5	-0.67	49.6	-3	0.39
Permit Processing	28. Have permit services send out facility permits like regular permits. Facility permits are sent out by units, therefore no secondary quality control is completed.	-1.25	3.33	0	1.33	31.2	0	0.35
Permit Processing	20. Bifurcate NSR permitting for major and non-major sources.	2.5	5.33	1.5	0.67	22.4	0	0.32

Work Flow

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Work Flow	2. Create pre-application forms.	32.5	32.00	10.5	11.33	52.8	12	1.51
Work Flow	1. Develop policy of pre-application meetings.	32.5	32.00	10.5	11.33	40	13	1.39
Work Flow	3. Permanent group of "meeters" provide answers within 24 hours or permit fee is waived, must stick to answer or permit fee waived; promote consistency.	25	40.00	10.5	10.67	20	18	1.24
Work Flow	11. Create a detailed criteria for rejecting permits.	35	15.33	4.5	2.67	49.6	9	1.16
Work Flow	14. Create a pre-certified module for	23.75	33.33	9	11.33	24.8	8	1.10

	emergency ICEs.							
Work Flow	43. Amend Rule 219 to exempt standardized *de minimis* emission levels.	42.5	36.00	6	3.33	15.2	7	1.10
Work Flow	4. Engineers should be allowed to pre-screen from their desks (so information is available when applicants call back.	33.75	10.67	6	0.00	52.8	5	1.08
Work Flow	32. Have pre-screeners reject applications that are missing additional required reports or information (BACT, source test, risk assessment, ERCS).	27.5	4.67	3	5.33	53.6	14	1.08
Work Flow	18. Registration or Permit-By-Rule. • Issue over-the-counter (or Internet) Permit to Construct Registration for any equipment for which a P/C Registration Protocol is developed. • Consider Certification and Registration (C&R). • Register small sources rather than submitting them to the standard permit process (reduce amount of time). • Issue general permits for classes of sources. Register any equipment for which a P/C Registration Protocol is developed. • Encourage more manufacturers to certify equipment instead of requiring end-users to get permit (like R1111, 1121, 1146.2). • Establish and execute more equipment to be pre-certified. • Fund expansion of over-the-counter permitting.	36.25	35.33	10.5	9.33	2.4	8	1.02
Work Flow	12. Return incomplete applications immediately with explanations. • Applications screened for major omissions when submitted and immediately rejected if omissions are found.	23.75	11.33	3	2.67	50.4	6	0.97

Work Flow	31. Combined authority to construct and permit to operate for sources that do not have to be source tested. (Table 4-1)	27.5	20.67	4.5	2.00	35.2	6	0.96
Work Flow	9. Limit the amount of time an application can remain in the prescreening process before automatically rejected.	31.25	28.00	4.5	8.00	18.4	4	0.94
Work Flow	15. Have expedited permitting for minor sources.	35	25.33	1.5	2.00	27.2	3	0.94
Work Flow	41. Consider spray booth replacement as a modification. If the basic coating operation is not changed and emissions are not increased, BACT should not be triggered.	33.75	-1.33	1.5	0.00	53.6	6	0.94
Work Flow	8. Assign a person responsible for resolving applications held in prescreening more than 7 days.	23.75	8.00	3	2.00	47.2	9	0.93
Work Flow	50. Create team to find the largest bottlenecks and apply express processing to those areas.	26.25	12.67	1.5	3.33	32	17	0.93
Work Flow	5. Have full-time pre-screeners to increase consistency.	23.75	22.67	3	4.67	26.4	12	0.92
Work Flow	33. Have pre-screeners send out letters to applicants that need BACT, source test, risk assessment, ERCs.	21.25	14.67	6	1.33	42.4	5	0.91
Work Flow	6. Make pre-screening the key position. • Add incentives to become a pre-screener (increased pay or title for this as a full time position).	25	18.00	0	0.00	38.4	8	0.89
Work Flow	13. Pre-screening – eliminate, transfer responsibilities to processing engineers. • Let individual units receive and issue permits (i.e. eliminate permit processing and pre-screening.	28.75	4.67	1.5	6.00	38.4	10	0.89
Work Flow	28. Deem complete/incomplete in less than 30 days.	25	16.00	4.5	5.33	22.4	16	0.89
Work Flow	7. Change prescreen policy to one phone call, not three.	37.5	-6.67	1.5	0.00	48.8	6	0.87
Work Flow	21. Green carpet program.	12.5	19.33	6	6.00	35.2	7	0.86
Work Flow	30. Create penalty for failure of District to meet 7/30/180 designation.	12.5	8.00	0	4.67	48	11	0.84

Work Flow	45. Develop intranet system for improving internal communication.	17.5	12.00	4.5	0.00	40.8	9	0.84
Work Flow	35. Fourteen day turnaround for CPP applications.	21.25	16.00	1.5	4.00	36.8	2	0.82
Work Flow	47. Covert Liberty to intranet (currently on network) to expand the number of users and increase access speed.	13.75	9.33	0	6.00	43.2	9	0.81
Work Flow	34. Authorize direct access to application files for CPPs.	17.5	2.00	1.5	0.67	47.2	6	0.75
Work Flow	52. Clarify responsibilities between engineers and data entry on RECLAIM/facility change of ownership.	13.75	12.00	3	2.67	39.2	4	0.75
Work Flow	36. Open Records Section to permit processing staff at all times. (Currently only open during business hours). • Open Records Section to express permit processing staff at all times.	12.5	0.67	0	0.67	50.4	10	0.74
Work Flow	51. Establish facility permit processing software (FPPS) Explore commercially available software packages for AQMD or permit applicant use.	22.5	12.67	4.5	4.67	18.4	6	0.69
Work Flow	49. Add entire permit process to after hour express permit processing not just the permit evaluation engineers.	13.75	3.33	0	0.00	44.8	3	0.65
Work Flow	37. Data entry staff to work directly within unit (i.e. instead of in permit services).	-5	11.33	0	0.00	53.6	4	0.64
Work Flow	44. Tie the CLASS system to integrated Voice Response (VR) for applicants to check status of application. Do the same with the Internet. (	21.25	2.00	0	2.00	30.4	8	0.64
Work Flow	29. Re-evaluate 7/30/180 designation, prioritize based on current requirements (e.g. 7/60/120). 180-day designation is no longer a required limit but 120-day designation is a regulatory standard. • Re-evaluate 7/30/180 designation against the actual time it takes to process permits. • More realistic designations and additional categories (14/30/75/120).	15	11.33	4.5	0.00	24.8	7	0.63

Work Flow	27. Consolidated permitting schedule for all sources within a facility.)	6.25	16.00	3	5.33	26.4	5	0.62
Work Flow	19. Develop an Accelerated Permit Program (APP) to allow a qualifying air pollution source or abatement device to be installed and operated under a temporary permit to operate.	23.75	16.67	6	3.33	4	7	0.61
Work Flow	17. Expand PR222 Registration concept to include additional area sources.	23.75	21.33	3	5.33	0.8	6	0.60

Work Flow	46. Issue general permits such as those of the Commonwealth of Pennsylvania, Department of Environmental Protection (PADEP).	26.25	30.67	0	2.00	-12.8	6	0.52
Work Flow	38. Divide permit services among engineering divisions and departments.	15	2.67	0	3.33	22.4	7	0.50
Work Flow	48. Hire consultant to review security measures in Ingres Database and provide suggestions to automate system. • Review Ingres Database security every time a large program like FPPS/SSPS is added. (4.1.5. Network Security-Ingres Database Updates)	2.5	0.67	0	3.33	36	7	0.50
Work Flow	25. Tiered Emission Packages (TEP).	10	31.33	3	0.67	-1.6	2	0.45
Work Flow	10. Create team to Re-evaluate Pre-screening process.	2.5	0.67	3	0.00	32.8	5	0.44
Work Flow	26. Consolidation (facility permits) into one program.	8.75	23.33	6	7.33	-9.6	6	0.42
Work Flow	24. Umbrella Permit (UP).	8.75	21.33	6	2.67	1.6	0	0.40
Work Flow	23. Limit the number of rejected applications, because applications are submitted incomplete because facilities are not familiar enough with regulations or lack adequate technical ability to complete applications.	21.25	7.33	3	0.00	3.2	4	0.39
Work Flow	40. Re-negotiate with EPA the designation of Extreme Ozone Non-attainment based on the new 8-hr ozone standards.	3.75	-4.00	-4.5	-1.33	49.6	-5	0.39
Work Flow	20. Create satellite permitting centers.	-8.75	17.33	0	2.67	19.2	6	0.36
Work Flow	39. Eliminate the RECLAIM program and fold regulatory requirements from RECLAIM into other programs.	17.5	10.67	3	0.00	-0.8	0	0.30

Work Flow	42. Amend Reg. 17 (PSD) to level with federal program and temporarily suspend PSD delegation while Reg. 17 is being amended.	11.25	13.33	6	4.00	-8.8	4	0.30
Work Flow	22. Accept all applications whether complete or not.	-13.75	-3.33	-3	-4.00	41.6	-6	0.12
Work Flow	16. Have an appeals process for expedited permitting.	-6.25	-4.67	0	0.00	20	-2	0.07

Tracking

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Tracking	8. Assign a unique number to each piece of permitted equipment and store all historical data under the equipment number, currently historical data has to be traced from modification to modification (each request can take a day). This would allow equipment to be traced if sold or relocated (i.e. inter-facility tracking).	31.25	14.67	0	8.00	48	9	1.11
Tracking	2. Develop standard permits with basic equipment minimum requirements.	26.25	34.67	10.5	8.67	22.4	8	1.10
Tracking	3. Develop a method to track source test, risk assessments, and CEQA reports electronically that is tied to the application number, so that the engineer knows if such documents have been received and where to find them. • Develop a database management system to track location of the applications between locations and notify managers electronically. • Track all permit applications in database; immediate ID assignment. • Use bar codes for tracking.	30	16.67	1.5	2.67	41.6	18	1.10

	• Bar-code permit application folders. • Use bar codes to track all application related material such as source test, risk assessments, CEQA, etc. (currently applicants complain that District loses supporting documents). (• Add a way to associate electronically the permit or application number as part of each transaction. (less confusion, numbers assigned by pre-screening now.)							
Tracking	6. Assign a team to investigate the wide disparity in the time to process similar equipment between the units. Apply streamlining techniques used by the more efficient unit to the other units and post practices to increase standardization. (Fee Schedule Analysis)	25	23.33	3	8.00	36.8	9	1.05
Tracking	9. Accountability/Tracking • Implement a project management program for applications; one engineer performs all the analyses; assumes accountability. • Project sheets - use application numbers as code numbers (30-minute increments). • Connect projects sheets with timecard system (new system is capable). • Use capabilities of PeopleSoft to track time spent on applications. (Fee Schedule Analysis) • Track time on timecards spent on applications (same bar code).	25	17.33	0	5.33	39.2	18	1.05
Tracking	7. Assign a team to investigate the amount of time and effort required to modify or change conditions on a permit. Engineers have complained that the historical and new research are unavailable or not useful. (Fee Schedule Analysis)	30	12.00	0	3.33	35.2	6	0.87
Tracking	5. Minimize duplication ID creation by giving	13.75	9.33	0	1.33	48	4	0.76

	applicant preprinted labels for 400A.							
Tracking	10. Develop aging reports for managers, supervisors and engineers.	12.5	3.33	1.5	0.00	42.4	12	0.72
Tracking	1. Systematically correct all data errors in tracking system.	10	3.33	0	0.67	48.8	7	0.70
Tracking	11. Track when permits are sent out. Engineers do not know where permits are after printing.	3.47E-16	4.67	0	0.00	48	9	0.62
Tracking	4. Do not use bar codes because it has the same limits as the current electronic system which tracks applications based on database activity.	5	-2.67	0	0.00	51.2	-2	0.52

Forms

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Forms	7. Give the CPPs the same forms and guidelines that the engineering staff uses.	31.25	25.33	7.5	10.00	53.6	4	1.32
Forms	4. Standardize permit application forms. • Customize more application packages similar to service stations with a pre-defined fee schedule. • Have one department in charge of forms so that changes are not made as often. • Insure that IM has input on forms because databases and applications are based on forms. • Require that all departments agree on any change to forms to prevent the forms from changing as often and ensure that important fields are not dropped. • Develop form EX which will flag equipment types that automatically	26.25	29.33	9	11.33	44	7	1.27

	require source test, BACT or risk assessment (e.g. Boilers over x mmbtu/hr need BACT, boilers over x mmbtu/hr BACT and source test, chrome tanks over x ft2 need risk assessment, etc.).							
Forms	10. Examples, i.e. Pre-filled out forms	15	24.00	3	7.33	50.4	2	1.02
Forms	3. Simplify permit application forms. • Revise forms color code information that is mandatory or application is rejected automatically. • Place wording on 400A Form that states that application will be rejected if entire form is not completed. • Include a checklist of required information with application. • Create permit application forms that are easy to read (font on current forms is too small). • Have more pre-certified equipment to qualify for registration. • Ensure that application forms and data entry programs include the essential information and organization in a consistent, logical, efficient and easy-to-use manner.	16.25	21.33	4.5	4.67	49.6	5	1.01
Forms	6. Standardize application format for CPPs.	11.25	18.00	3	5.33	52	3	0.93
Forms	8. Send facilities the “inspectors view” Title V permit (all wording and conditions per permit unit on one form.	5	20.00	6	2.67	50.4	0	0.84
Forms	5. Equipment oriented Title V • Staple existing permits and add EPA requirements for Title V (Equipment based permit processing philosophy). • Staple existing permits after re-entered and stored to save for future Title V changes and add EPA requirements for Title V (Equipment based permit processing philosophy).	25	14.00	0	2.67	27.2	3	0.72
Forms	9. Develop and implement a Form 400-CEQA	11.25	0.67	6	0.00	49.6	2	0.70

	to be completed by applicants.							
Forms	1. Redesign Form 400A ; remove Title V information from 400A.	5	10.00	3	0.00	50.4	0	0.68
Forms	2. Redesign Form 400A divide the non-Title V 400A into two parts, one for facility and company information, one for information on equipment.	5	9.33	0	0.00	50.4	0	0.65

Interactions

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Interactions	6. Develop training and cross training programs across permitting, source test, health risk assessment.	23.75	17.33	6	5.33	32.8	14	0.99
Interaction	10. Present to the public the legal and practical implications of certain processes: HRA (screening refined), BACT, etc. to help them better plan, redesign or cancel plans before submitting applications.	16.25	18.00	10.5	4.00	44.8	2	0.96
Interactions	5. Designate an engineer with source testing experience to each unit.	27.5	12.67	4.5	4.00	36.8	10	0.95
Interactions	7. Have IM present streamlining team with on-line capabilities and planned additions. • Keep same team of engineers and District streamlining members throughout the duration of long and major IM projects (changes to the personnel often cause the retraining of new members and redesign of newly programmed systems to please new team not necessarily because changes are beneficial. • Train users that interact with IM with the processes in question, especially teams that have input on large systems (it is unwise to have managers who do not use the system critique the system).	28.75	1.33	0	3.33	44	11	0.88

	• Develop system to keep IM informed, policies need to systematized and give to IM else they will not be incorporated or planed for in the design and program of new and existing systems.							
Interactions	2. Improve coordination with economic development corporations and small businesses in explaining the permit process.	12.5	14.67	7.5	1.33	46.4	3	0.85
Interaction	11. Have IM show substantive changes to programs, i.e. training on where and how to use these changes.	23.75	0.67	0	2.00	37.6	15	0.79
Interaction	8. Create a division that fields compliance and planning issues for industry that is not tied to enforcement (Allows anonymous questions).	10.9375	23.33	15	4.17	10	12.5	0.76
Interaction	9. Present and describe the permit process (sequence) to industry to help them understand the process.	1.25	12.00	4.5	4.00	36	5	0.63
Interactions	4. Add additional CEQA questions to the existing 400A.	3.75	0.67	3	0.00	50.4	1	0.59
Interactions	3. Require engineers to screen for CEQA, not applicants. • Maintain single CEQA question on forms. (	-2.5	12.00	3	0.00	44	1	0.58
Interactions	1. Improve coordination with other local, state or federal agencies • in building permits. • facility inspections • contaminated soil clean-up. • underground tanks inspections.	8.75	6.00	3	0.67	31.2	2	0.52

Management

Category	Solution	Score Efficiency	Score Responsive-ness	Score AQ Mandates	Score Support	Score Implemen-tation	Score Manage-ment	Score
Management	5. Posting of Standards • Place permitting policies and	35	31.33	9	8.67	45.6	11	1.41

	procedures on Intranet. • Place equipment-specific permit application instructions to include all requirements, methods to determine compliance and standard conditions on Intranet. • Place standard engineering evaluation protocol including equipment descriptions, background, process description, emission calculations, rule evaluation, permit conditions on Intranet. (• Place standard permits and conditions for frequently permitted equipment on Intranet. • Create consistent standard policies and procedures for all evaluation teams or groups. • Document all policy decisions and post electronically.							
Management	4. Standardization • Standardize exemptions and standards for risk assessments (especially for common equipment). • Place standard conditions into database that is accessible to all engineers. • Capture permit wording and conditions on network (currently only on desktop). • Collect existing permit wording and conditions from desktops and place into network. • Have database pull most common conditions per application type (BCAT/CCAT) to limit the amount of search time for standard conditions. • Make all condition additions to database through one or a team of	30	28.67	9	7.33	45.6	11	1.32

	people to retain standardization. • Have desktop computers flag repeated common conditions for submittal to standard condition pool.							
Management	21. Reward units or divisions that better business practices.	25	12.00	1.5	4.00	52.8	21	1.16
Management	18. Reduce QA/QC load by standardization of permit process.	25	21.33	7.5	4.00	48	5	1.11
Management	7. Increase training and incentives for staff engineers, consultants and businesses to improve applications policy consistency.	22.5	22.67	7.5	7.33	42.4	7	1.09

Management	16. Require managers to submit business plans for their divisions. • Require business plans to include efficiency and cost reduction. • Hold managers accountable to business plans.	31.25	10.67	1.5	3.33	47.2	12	1.06
Management	19. Hire management that have proven management skills.	27.5	9.33	3	1.33	37.6	14	0.93
Management	23. Develop rotating audits to help re-enforce management goals.	22.5	10.67	1.5	2.67	46.4	8	0.92
Management	2. Remove "three strikes" policy for CPPs.	22.5	4.67	3	6.00	52.8	1	0.90
Management	6. Allow engineers to add conditions to the standard conditions as needed.	18.75	5.33	4.5	-0.67	50.4	11	0.89
Management	1. Provide CPPs consultation space at AQMD (free or cost).	17.5	10.67	4.5	8.00	41.6	3	0.85
Management	24. Promote customer satisfaction for internal and external clients, through feedback forms. • Provide a formal means for feedback from industry on the Permit Processing. (Table 4-1)	13.75	11.33	0	0.00	49.6	8	0.83
Management	26. Develop management by objectives reviews in which employees set goals and growth plans with superiors.	21.25	5.33	0	1.33	39.2	15	0.82
Management	28. Use TQM system (e.g. ISO 9000, 14000) for continuous improvement.	13.75	18.67	4.5	4.67	23.2	17	0.82
Management	25. Provide management and productivity skill classes.	20	8.67	1.5	1.33	36	13	0.81
Management	15. Decide ideology moving all permits toward facility type permits, or toward single permit unit permits (policies tend to swing back and forth undoing each other).	20	19.33	4.5	2.67	24.8	9	0.80

Management	27. Require management and productivity skill classes for employees that are not meeting goals agreed to by employee and supervisors in previous reviews.	25	8.67	0	1.33	36	9	0.80
Management	3. Define “three strikes” against CPPs.	6.25	3.33	4.5	4.67	52.8	3	0.75
Management	29. Conduct brainstorming session with AQMD with applicants.	16.25	11.33	3	0.00	40.8	3	0.74
Management	8. Contract engineers or specialized staff for unique assignments.	16.25	7.33	1.5	3.33	39.2	4	0.72
Management	17. Budget unit money based on business plan projections.	17.5	4.00	0	2.00	37.6	10	0.71
Management	14. Allow flexible work hours including 5/8 week, job sharing, etc. to maximize available permit engineering hours and provide different after hour express permitting time.	10	3.33	0	0.00	48.8	7	0.69
Management	9. Dugout processing sessions.	18.75	9.33	1.5	5.33	32	0	0.67
Management	20. Hire consultants to critique business practices.	16.25	8.00	0	0.00	32.8	8	0.65
Management	12. Use data technicians to work on Facility permit revisions and administrative modifications.	23.75	2.00	0	2.00	28.8	7	0.64
Management	22. Monitor phone conversations with public for quality assurance.	-2.5	10.67	0	0.00	37.6	11	0.57
Management	11. Have multilingual staff.	-5	6.67	3	4.00	28.8	1	0.38
Management	13. Implement an emissions reduction analysis test for applications.	-5	-4.00	0	2.00	33.6	-1	0.26
Management	10. Inspectors evaluate non-permitted sources.	-6.25	-0.67	7.5	0.00	19.2	-1	0.19

Solutions Sorted by Category and Score

SOLUTIONS SORTED BY CATEGORY AND SCORE

Fees

Category	Solution	Score
Fees	15. Create a fee worksheet for the applicant (ease and standardization).	1.08
Fees	3. Incomplete Fees or Forms • Increase the penalty for incomplete applications as a deterrent.	0.88
Fees	2. Assistance to applicant • Institute a Rule 301 hotline to help people calculate fees.	0.83
Fees	1. Accountability/Fee Study • Record actual time spent on each application, so Fee Study group has actual data to average.	0.69
Fees	12. Make applications submitted by CPPs half price.	0.69
Fees	5. Efficient Check Processing • Remove checks from applications immediately and process them instead of holding them until after preprocessing or prescreening. • Immediately assign an application number to an application when received despite complete or fees. • Associate check with application given at time received (i.e. assign application number immediately upon reception). • Deposit check immediately upon receipt. • Do not put finance hold on application if total fees paid exceed fees due. • Automation of accounts receivable and CLASS system to enable automation of refund check processing.	0.67
Fees	4. Make fee applicability based on application postmark.	0.64
Fees	10. Renew operating permits every 5 years (reduce work for annual fees).	0.63
Fees	11. Guarantee a maximum time (7/30/180) for permit review and issuance. • Amend Rule 301 to allow applicants to pay a reasonable amount of additional fees in exchange for AQMD guaranteed permit delivery time, refundable if time is not met.	0.54
Fees	8. Set up a debit account for qualified applicants to pay fees.	0.53

Fees	14. Track status of applications with missing or incorrect fees.	0.47
Fees	13. Recategorize the BCAT/CCATs within the Fee Schedule to better match the current processing cost.	0.43
Fees	6. Accept applications with 85% fee paid, 45 days for balance.	0.42
Fees	7. Allow electronic fund transfer credit cards, or Fax-A-Check for application fees to promote Internet application submittal (electronic prescreening, instant payment of fees).	0.38
Fees	9. Include fee payment in loan guarantee programs.	-0.01

Permit Support Systems

Category	Solution	Score
Permit Support Systems	10. Publicize list of manufacturers approved for the over-counter permits. • Place list of manufacturers approved for the over-counter permit process on the web. • Give permit services the list of manufacturers approved for the over-counter permits.	1.22
Permit Support Systems	14. Create a checklist per form for prescreeners to verify application completeness (add QA/QC).	1.22
Permit Support Systems	15. Create a computerized tutorial or expert system for filling out applications (education).	1.22
Permit Support Systems	23. Establish AQMD permitting homepage (4.1.1 2) • Put links to technical data on AQMD web page (e.g. EPA AP-42). • Put default emission factors on the AQMD web page.	1.11
Permit Support Systems	25. Accelerate WARP II implementation.	1.00
Permit Support Systems	22. Develop instructions for Tier I and Tier II for applications that require risk assessment and potentially will require Tier III. (If a facility greatly fails Tier II, it knows a Tier IV risk assessment is needed.)	0.99
Permit Support Systems	33. Permanent Lobby Duty staff. Currently data entry staff take turns 2 days/month. Cannot do normal duties from lobby. Use staff that can interact with industry and answer questions and concerns.	0.99
Permit Support Systems	30. Keep fee sheets current in database, data entry does half calculations manually from manually generated sheets because database is not updated.	0.98

Permit Support Systems	16. Reduce redundant data entry by capturing data entered during prescreening in the database. • Have prescreeners enter what additional elements are required before approving permit. (BACT, source test, risk assessment, ERCs) so engineers do not have to reevaluate what is missing again when they receive the application.	0.96
Permit Support Systems	35. Create pamphlets to instruct on completing application forms.	0.94
Permit Support Systems	12. Add a keyword search capability in the Prescreening system (reduce time).	0.85
Permit Support Systems	20. Test CPPs • Require CPPs to periodically submit a mock application. (education, QA/QC) • The CPPs must pass predetermined level of completeness and accuracy to be recertified (education, QA/QC). • Record data on CPPs for better evaluation.	0.83
Permit Support Systems	29. Update BCAT/CCAT (used by AQMD to calculate fees, not seen by public) to match Rule 301 (used by public). There have been credibility issues when fees do not match.	0.82
Permit Support Systems	34. Give all staff ability to print e-mail. Some permit services staff cannot print out e-mail sent to them by engineers to attach to files.	0.82
Permit Support Systems	1. Require all applications to be submitted electronically; electronic 400A and 400 Ex forms can prevent acceptance unless complete. • Require all facilities who submit annual fee reports electronically to submit permit applications electronically. • Require all RECLAIM or Title V facilities to submit permit applications electronically. • Accept applications via fax or e-mail.	0.81
Permit Support Systems	11. Continue to load all application software to local hard drives on desktop computers (able to work when network is down).	0.81
Permit Support Systems	9. Place CPP policies on the web.	0.77
Permit Support Systems	6. Allow funding to reconfigure network as needed (the increased stability over the past year occurred because of reconfiguration, but with so many new systems, WARP, FPPS, SSPS, RACER, electronic timecards, the system needs to have more flexibility in updating and reconfiguration.	0.76

Permit Support Systems	18. BCAT/CCAT - eliminate assignment of these codes during permit processing.	0.76
Permit Support Systems	13. Add a computer fix to prevent data entry staff from entering data that conflicts with information input by the SSC engineer (error reduction).	0.75
Permit Support Systems	19. Provide search capabilities for BCAT/CCAT by number and description.	0.73
Permit Support Systems	2. Establish policy to make network PC- or Server-based.	0.72
Permit Support Systems	24. Use imaging, electronic workflow and other IM technologies for a paperless system initially for simple then complex equipment.	0.72
Permit Support Systems	32. Remove need for previous permit number at data entry level; just use application number to track and label new applications. Modifications and Change of Ownerships need previous permit number, before labels are made. Data entry people can't correlate, need engineers.	0.72
Permit Support Systems	4. Make network Server-based because there are plenty of PC and walk up stations, but when the server is off line e-mail, intranet, internet, Liberty, Central Information Repository database access to Ingres (finance, permitting, etc.) cannot be accessed.	0.70
Permit Support Systems	7. Move to Microsoft NT • Upgrade to Microsoft NT (allows use of current MS application on the desktops such as outlook; updates to NT and Windows will upgrade netware; and better integration of network with desktops). • Replace Beyond Mail with Outlook (e-mail, scheduler, etc.) which is already on desktops (plus updates for Outlook come with MS operating systems, Beyond Mail upgrades must be purchased separately).	0.70
Permit Support Systems	27. Allow more than one person the authority to reject applications (i.e. send out letters). Currently, only one persons is authorized	0.69
Permit Support Systems	28. Update BCAT/CCAT to consolidated instances of duplication to ensure the similar equipment BCAT/CCAT received the same fee.	0.69
Permit Support Systems	31. Search or drop down Zip Codes that are easily updated (as new ZIPs are added) in database to aid in processing and mailing.	0.67

Permit Support Systems	3. Make network PC-based to allow productivity (word processing and spreadsheets only) when network is down (which has not happened recently).	0.63
Permit Support Systems	5. Create a LAN for each floor to minimize effect of one or more servers failing (work could be done off LAN instead of overall network, until network is stabilized).	0.61
Permit Support Systems	8. Update web site more often, train more than one "web deputy".	0.56
Permit Support Systems	21. Use "intelligent" SCC codes to identify equipment instead of BCAT/CCAT.	0.52
Permit Support Systems	26. Follow up on rejections letters. Were applications resubmitted, is the equipment operating unpermitted, or has the project been terminated?	0.51
Permit Support Systems	17. Return all permitting databases to (BCAT/CCAT) system.	0.42

Permit Processing

Category	Solution	Score
Permit Processing	2. A permitting handbook should be updated for use by applicants and engineers; i.e. instruction booklet. (Standardization.) • Develop a Rule 1401 template. • Develop a Rule 1401 handbook for different equipment types or attach to new permit handbook.	1.49
Permit Processing	16. Develop a BACT manual (education, standardization). • Publish BACT guide lines as they become available on the web. • Publish new version of BACT guidelines. • Implement BACT review committee to finalize actions.	1.21
Permit Processing	22. Rule 1401 - drastically simplify Rule 219 requirements, allow satisfying Tier 2 as a means to have equipment remain Rule 219 exempt.	1.18
Permit Processing	23. Create forum to resolve inconsistencies and polices between units. Part of lack of standardization is lack of forum to interact and compare policies and standards.	1.14

Permit Processing	3. Limited Internet access • Modify the current security to allow all employees access to selected government internet sites (less time in library and research). • Have information management develop - intranet mirror of important sites.	1.04
Permit Processing	15. Have specialized staff for various source categories.	1.04
Permit Processing	17. Create an automated computer expert system (ACES) to assist permit processing and keep data on unique equipment.	1.00
Permit Processing	13. Develop training and cross training programs	0.95
Permit Processing	1. Complete a users manual for CAPPs or replacement computer system.	0.94
Permit Processing	4. Allow full access to the internet and monitor activities.	0.93
Permit Processing	26. Require engineers to attend certain number of field evaluations to increase experience. Engineering and rule evaluations are desk jobs now, reducing actual hands-on experience.	0.93
Permit Processing	6. Reprioritize, Require engineers to process applications in a certain order to ensure that lengthy or time-consuming processes are completed up front (BACT, emission offsets, health risk assessments, source tests, or public notification) (facilities may cancel application or alter if original application is noncompliant).	0.92
Permit Processing	21. Improve NSR module/procedures, data should automatically be copied over to new applications for all administrative change applications.	0.91
Permit Processing	30. Allow facility permits to be printed in parts, currently only whole permit can be printed.	0.84
Permit Processing	24. Train staff on Rules. Summaries of impacts of rule changes on permit process. (e.g. restore Rule Interpretation Group).	0.82
Permit Processing	11. Make applications for equipment without a written permit a higher priority than applications for permit to construct before construction because potential violation is high.	0.78
Permit Processing	18. Add QA/QC and editing functions to CAPPS or replacement system.	0.75

Permit Processing	27. Archive facility permit information. Information is lost electronically during modification. Previous evaluations or changes are not known to current evaluating engineers.	0.74
Permit Processing	5. Develop PSD modeling and analysis methods (create educational document).	0.72
Permit Processing	29. Have RECLAIM applications scanned or filed with Records. Currently files are kept with engineers.	0.71
Permit Processing	7. Treat relocations as modification not new facilities. • Exempt straight relocations from BACT requirements.	0.68
Permit Processing	8. Redefine "achieved-in-practice" for LAER and BACT to include only those installed to comply with air pollution regulations. • Refer BACT issue to BACT SRC re LAER determinations. • Reevaluate BACT/LAER issues for R1151 and other low emitting equipment. • LAER determined when application is deemed complete. • Empower BSRC, ombudsman.	0.67
Permit Processing	19. Upgrade CAPPs to Windows based system.	0.66
Permit Processing	31. Assign a team to investigate the amount of time spent acquiring information for incomplete applications. (Fee Schedule Analysis)	0.64
Permit Processing	12. Create a separate division to handle equipment without a written permit to insure that these permits do not hold up applications filed before construction or modification.	0.62
Permit Processing	10. Create task force to evaluate the risk of placing applications for equipment without a written permit on a lower priority than the applications for permit to construct before construction.	0.57
Permit Processing	9. Training and certification of consultants. • Increase use of consultants to process application.	0.51
Permit Processing	25. Designate team to update NSR.	0.46
Permit Processing	14. Place incomplete applications in low priority.	0.39

Permit Processing	28. Have permit services send out facility permits like regular permits. Facility permits are sent out by units, therefore no secondary quality control is completed.	0.35
Permit Processing	20. Bifurcate NSR permitting for major and nonmajor sources.	0.32

Work Flow

Category	Solution	Score
Work Flow	2. Create pre-application forms.	1.51
Work Flow	1. Develop policy of pre-application meetings.	1.39
Work Flow	3. Permanent group of "meeters" provide answers within 24 hours or permit fee is waived, must stick to answer or permit fee waived; promote consistency.	1.24
Work Flow	11. Create a detailed criteria for rejecting permits.	1.16
Work Flow	14. Create a precertified module for emergency ICEs.	1.10
Work Flow	43. Amend Rule 219 to exempt standardized *de minimis* emission levels.	1.10
Work Flow	4. Engineers should be allowed to prescreen from their desks (so information is available when applicants call back.	1.08
Work Flow	32. Have prescreeners reject applications that are missing additional required reports or information (BACT, source test, risk assessment, ERCS).	1.08
Work Flow	18. Registration or Permit-By-Rule. • Issue over-the-counter (or Internet) Permit to Construct Registration for any equipment for which a P/C Registration Protocol is developed. • Consider Certification and Registration (C&R). • Register small sources rather than submitting them to the standard permit process (reduce amount of time). • Issue general permits for classes of sources. Register any equipment for which a P/C Registration Protocol is developed. • Encourage more manufacturers to certify equipment instead of requiring end-users to get permit (like R1111, 1121, 1146.2). • Establish and execute more equipment to be precertified. • Fund expansion of over-the-counter permitting.	1.02

Work Flow	12. Return incomplete applications immediately with explanations. • Applications screened for major omissions when submitted and immediately rejected if omissions are found.	0.97
Work Flow	31. Combined authority to construct and permit to operate for sources that do not have to be source tested. (Table 4-1)	0.96
Work Flow	9. Limit the amount of time an application can remain in the prescreening process before automatically rejected.	0.94
Work Flow	15. Have expedited permitting for minor sources.	0.94
Work Flow	41. Consider spray booth replacement as a modification. If the basic coating operation is not changed and emissions are not increased, BACT should not be triggered.	0.94
Work Flow	8. Assign a person responsible for resolving applications held in prescreening more than 7 days.	0.93
Work Flow	50. Create team to find the largest bottlenecks and apply express processing to those areas.	0.93
Work Flow	5. Have full-time prescreeners to increase consistency.	0.92
Work Flow	33. Have prescreeners send out letters to applicants that need BACT, source test, risk assessment, ERCs.	0.91
Work Flow	6. Make prescreening the key position. • Add incentives to become a prescreener (increased pay or title for this as a full time position).	0.89
Work Flow	13. Prescreening – eliminate, transfer responsibilities to processing engineers. • Let individual units receive and issue permits (i.e. eliminate permit processing and prescreening.	0.89
Work Flow	28. Deem complete/incomplete in less than 30 days.	0.89
Work Flow	7. Change prescreen policy to one phone call, not three.	0.87
Work Flow	21. Green carpet program.	0.86
Work Flow	30. Create penalty for failure of District to meet 7/30/180 designation.	0.84
Work Flow	45. Develop intranet system for improving internal communication.	0.84
Work Flow	35. Fourteen day turnaround for CPP applications.	0.82

Work Flow	47. Covert Liberty to intranet (currently on network) to expand the number of users and increase access speed.	0.81
Work Flow	34. Authorize direct access to application files for CPPs.	0.75
Work Flow	52. Clarify responsibilities between engineers and data entry on RECLAIM/facility change of ownership.	0.75
Work Flow	36. Open Records Section to permit processing staff at all times. (Currently only open during business hours). • Open Records Section to express permit processing staff at all times.	0.74
Work Flow	51. Establish facility permit processing software (FPPS) Explore commercially available software packages for AQMD or permit applicant use.	0.69
Work Flow	49. Add entire permit process to after hour express permit processing not just the permit evaluation engineers.	0.65
Work Flow	37. Data entry staff to work directly within unit (i.e. instead of in permit services).	0.64
Work Flow	44. Tie the CLASS system to integrated Voice Response (VR) for applicants to check status of application. Do the same with the Internet. (	0.64
Work Flow	29. Reevaluate 7/30/180 designation, prioritize based on current requirements (e.g. 7/60/120). 180-day designation is no longer a required limit but 120-day designation is a regulatory standard. • Reevaluate 7/30/180 designation against the actual time it takes to process permits. • More realistic designations and additional categories (14/30/75/120).	0.63
Work Flow	27. Consolidated permitting schedule for all sources within a facility.)	0.62
Work Flow	19. Develop an Accelerated Permit Program (APP) to allow a qualifying air pollution source or abatement device to be installed and operated under a temporary permit to operate.	0.61
Work Flow	17. Expand PR222 Registration concept to include additional area sources.	0.60
Work Flow	46. Issue general permits such as those of the Commonwealth of Pennsylvania, Department of Environmental Protection (PADEP).	0.52
Work Flow	38. Divide permit services among engineering divisions and departments.	0.50

Work Flow	48. Hire consultant to review security measures in Ingres Database and provide suggestions to automate system. • Review Ingres Database security every time a large program like FPPS/SSPS is added. (4.1.5. Network Security-Ingres Database Updates)	0.50
Work Flow	25. Tiered Emission Packages (TEP).	0.45
Work Flow	10. Create team to Reevaluate Prescreening process.	0.44
Work Flow	26. Consolidation (facility permits) into one program.	0.42
Work Flow	24. Umbrella Permit (UP).	0.40
Work Flow	23. Limit the number of rejected applications, because applications are submitted incomplete because facilities are not familiar enough with regulations or lack adequate technical ability to complete applications.	0.39
Work Flow	40. Renegotiate with EPA the designation of Extreme Ozone Nonattainment based on the new 8-hr ozone standards.	0.39
Work Flow	20. Create satellite permitting centers.	0.36
Work Flow	39. Eliminate the RECLAIM program and fold regulatory requirements from RECLAIM into other programs.	0.30
Work Flow	42. Amend Reg. 17 (PSD) to level with federal program and temporarily suspend PSD delegation while Reg. 17 is being amended.	0.30
Work Flow	22. Accept all applications whether complete or not.	0.12
Work Flow	16. Have an appeals process for expedited permitting.	0.07

Tracking

Category	Solution	Score
Tracking	8. Assign a unique number to each piece of permitted equipment and store all historical data under the equipment number, currently historical data has to be traced from modification to modification (each request can take a day). This would allow equipment to be traced if sold or relocated (i.e. inter-facility tracking).	1.11
Tracking	2. Develop standard permits with basic equipment minimum requirements.	1.10
Tracking	3. Develop a method to track source test, risk assessments, and CEQA reports electronically that is tied to the application number, so that the engineer knows if such documents have been received and where to find them.	1.10

	• Develop a database management system to track location of the applications between locations and notify managers electronically. • Track all permit applications in database; immediate ID assignment. • Use bar codes for tracking. • Bar-code permit application folders. • • Use bar codes to track all application related material such as source test, risk assessments, CEQA, etc. (currently applicants complain that District loses supporting documents). (• Add a way to associate electronically the permit or application number as part of each transaction. (less confusion, numbers assigned by prescreening now.)	
Tracking	6. Assign a team to investigate the wide disparity in the time to process similar equipment between the units. Apply streamlining techniques used by the more efficient unit to the other units and post practices to increase standardization. (Fee Schedule Analysis)	1.05
Tracking	9. Accountability/Tracking • Implement a project management program for applications; one engineer performs all the analyses; assumes accountability. • Project sheets - use application numbers as code numbers (30-minute increments). • Connect projects sheets with timecard system (new system is capable). • Use capabilities of PeopleSoft to track time spent on applications. (Fee Schedule Analysis) • Track time on timecards spent on applications (same bar code).	1.05
Tracking	7. Assign a team to investigate the amount of time and effort required to modify or change conditions on a permit. Engineers have complained that the historical and new research are unavailable or not useful. (Fee Schedule Analysis)	0.87
Tracking	5. Minimize duplication ID creation by giving applicant preprinted labels for 400A.	0.76
Tracking	10. Develop aging reports for managers, supervisors and engineers.	0.72
Tracking	1. Systematically correct all data errors in tracking system.	0.70

Tracking	11. Track when permits are sent out. Engineers do not know where permits are after printing.	0.62
Tracking	4. Do not use bar codes because it has the same limits as the current electronic system which tracks applications based on database activity.	0.52

Forms

Category	Solution	Score
Forms	7. Give the CPPs the same forms and guidelines that the engineering staff uses.	1.32
Forms	4. Standardize permit application forms. • Customize more application packages similar to service stations with a predefined fee schedule. • Have one department in charge of forms so that changes are not made as often. • Insure that IM has input on forms because databases and applications are based on forms. • Require that all departments agree on any change to forms to prevent the forms from changing as often and ensure that important fields are not dropped. • Develop form EX which will flag equipment types that automatically require source test, BACT or risk assessment (e.g. Boilers over x mmbtu/hr need BACT, boilers over x mmbtu/hr BACT and source test, chrome tanks over x ft^2 need risk assessment, etc.).	1.27
Forms	10. Examples, i.e. Prefilled out forms	1.02
Forms	3. Simplify permit application forms. • Revise forms color code information that is mandatory or application is rejected automatically. • Place wording on 400A Form that states that application will be rejected if entire form is not completed. • Include a checklist of required information with application. • Create permit application forms that are easy to read (font on current forms is too small). • Have more precertified equipment to qualify for registration.	1.01

	• Ensure that application forms and data entry programs include the essential information and organization in a consistent, logical, efficient and easy-to-use manner.	
Forms	6. Standardize application format for CPPs.	0.93
Forms	8. Send facilities the "inspectors view" Title V permit (all wording and conditions per permit unit on one form.	0.84
Forms	5. Equipment oriented Title V • Staple existing permits and add EPA requirements for Title V (Equipment based permit processing philosophy). • Staple existing permits after reentered and stored to save for future Title V changes and add EPA requirements for Title V (Equipment based permit processing philosophy).	0.72
Forms	9. Develop and implement a Form 400-CEQA to be completed by applicants.	0.70
Forms	1. Redesign Form 400A ; remove Title V information from 400A.	0.68
Forms	2. Redesign Form 400A divide the non-Title V 400A into two parts, one for facility and company information, one for information on equipment.	0.65

Interactions

Category	Solution	Score
Interactions	6. Develop training and cross training programs across permitting, source test, health risk assessment.	0.99
Interaction	10. Present to the public the legal and practical implications of certain processes: HRA (screening refined), BACT, etc. to help them better plan, redesign or cancel plans before submitting applications.	0.96
Interactions	5. Designate an engineer with source testing experience to each unit.	0.95
Interactions	7. Have IM present streamlining team with on-line capabilities and planned additions. • Keep same team of engineers and District streamlining members throughout the duration of long and major IM projects (changes to the personnel often cause the retraining of new members and redesign of newly programmed systems to please new team not necessarily because changes are beneficial.	0.88

	• Train users that interact with IM with the processes in question, especially teams that have input on large systems (it is unwise to have managers who do not use the system critique the system). • Develop system to keep IM informed, policies need to systematized and give to IM else they will not be incorporated or planed for in the design and program of new and existing systems.	
Interactions	2. Improve coordination with economic development corporations and small businesses in explaining the permit process.	0.85
Interaction	11. Have IM show substantive changes to programs, i.e. training on where and how to use these changes.	0.79
Interaction	8. Create a division that fields compliance and planning issues for industry that is not tied to enforcement (Allows anonymous questions).	0.76
Interaction	9. Present and describe the permit process (sequence) to industry to help them understand the process.	0.63
Interactions	4. Add additional CEQA questions to the existing 400A.	0.59
Interactions	3. Require engineers to screen for CEQA, not applicants. • Maintain single CEQA question on forms. (	0.58
Interactions	1. Improve coordination with other local, state or federal agencies • in building permits. • facility inspections • contaminated soil clean-up. • underground tanks inspections.	0.52

Management

Category	Solution	Score
Management	5. Posting of Standards • Place permitting policies and procedures on Intranet. • Place equipment-specific permit application instructions to include all requirements, methods to determine compliance and standard conditions on Intranet. • Place standard engineering evaluation protocol including equipment descriptions, background, process description, emission calculations, rule evaluation, permit conditions on Intranet. (	1.41

	• Place standard permits and conditions for frequently permitted equipment on Intranet. • Create consistent standard policies and procedures for all evaluation teams or groups. • Document all policy decisions and post electronically.	
Management	4. Standardization • Standardize exemptions and standards for risk assessments (especially for common equipment). • Place standard conditions into database that is accessible to all engineers. • Capture permit wording and conditions on network (currently only on desktop). • Collect existing permit wording and conditions from desktops and place into network. • Have database pull most common conditions per application type (BCAT/CCAT) to limit the amount of search time for standard conditions. • Make all condition additions to database through one or a team of people to retain standardization. • Have desktop computers flag repeated common conditions for submittal to standard condition pool.	1.32
Management	21. Reward units or divisions that better business practices.	1.16
Management	18. Reduce QA/QC load by standardization of permit process.	1.11
Management	7. Increase training and incentives for staff engineers, consultants and businesses to improve applications policy consistency.	1.09
Management	16. Require managers to submit business plans for their divisions. • Require business plans to include efficiency and cost reduction. • Hold managers accountable to business plans.	1.06
Management	19. Hire management that have proven management skills.	0.93
Management	23. Develop rotating audits to help reenforce management goals.	0.92
Management	2. Remove "three strikes" policy for CPPs.	0.90
Management	6. Allow engineers to add conditions to the standard conditions as needed.	0.89
Management	1. Provide CPPs consultation space at AQMD (free or cost).	0.85

Management	24. Promote customer satisfaction for internal and external clients, through feedback forms. • Provide a formal means for feedback from industry on the Permit Processing. (Table 4-1)	0.83
Management	26. Develop management by objectives reviews in which employees set goals and growth plans with superiors.	0.82
Management	28. Use TQM system (e.g. ISO 9000, 14000) for continuous improvement.	0.82
Management	25. Provide management and productivity skill classes.	0.81
Management	15. Decide ideology moving all permits toward facility type permits, or toward single permit unit permits (policies tend to swing back and forth undoing each other).	0.80
Management	27. Require management and productivity skill classes for employees that are not meeting goals agreed to by employee and supervisors in previous reviews.	0.80
Management	3. Define “three strikes” against CPPs.	0.75
Management	29. Conduct brainstorming session with AQMD with applicants.	0.74
Management	8. Contract engineers or specialized staff for unique assignments.	0.72
Management	17. Budget unit money based on business plan projections.	0.71
Management	14. Allow flexible work hours including 5/8 week, job sharing, etc. to maximize available permit engineering hours and provide different after hour express permitting time.	0.69
Management	9. Dugout processing sessions.	0.67
Management	20. Hire consultants to critique business practices.	0.65
Management	12. Use data technicians to work on Facility permit revisions and administrative modifications.	0.64
Management	22. Monitor phone conversations with public for quality assurance.	0.57
Management	11. Have multilingual staff.	0.38
Management	13. Implement an emissions reduction analysis test for applications.	0.26
Management	10. Inspectors evaluate nonpermitted sources.	0.19

Solutions Rated by Score

SOLUTIONS SORTED BY SCORE

Category	Solution	Score
Work Flow	2. Create pre-application forms.	1.51
Permit Processing	2. A permitting handbook should be updated for use by applicants and engineers; i.e. instruction booklet. (Standardization.) • Develop a Rule 1401 template. • Develop a Rule 1401 handbook for different equipment types or attach to new permit handbook.	1.49
Management	5. Posting of Standards • Place permitting policies and procedures on Intranet. • Place equipment-specific permit application instructions to include all requirements, methods to determine compliance and standard conditions on Intranet. • Place standard engineering evaluation protocol including equipment descriptions, background, process description, emission calculations, rule evaluation, permit conditions on Intranet. (• Place standard permits and conditions for frequently permitted equipment on Intranet. • Create consistent standard policies and procedures for all evaluation teams or groups. • Document all policy decisions and post electronically.	1.41
Work Flow	1. Develop policy of pre-application meetings.	1.39
Forms	7. Give the CPPs the same forms and guidelines that the engineering staff uses.	1.32
Management	4. Standardization • Standardize exemptions and standards for risk assessments (especially for common equipment). • Place standard conditions into database that is accessible to all engineers. • Capture permit wording and conditions on network (currently only on desktop). • Collect existing permit wording and conditions from desktops and place into network. • Have database pull most common conditions per application type (BCAT/CCAT) to limit the amount of search time for standard conditions. • Make all condition additions to database through one or a team of people to retain standardization.	1.32

Category	Solution	Score
	• Have desktop computers flag repeated common conditions for submittal to standard condition pool.	
Forms	4. Standardize permit application forms. • Customize more application packages similar to service stations with a predefined fee schedule. • Have one department in charge of forms so that changes are not made as often. • Insure that IM has input on forms because databases and applications are based on forms. • Require that all departments agree on any change to forms to prevent the forms from changing as often and ensure that important fields are not dropped. • Develop form EX which will flag equipment types that automatically require source test, BACT or risk assessment (e.g. Boilers over x mmbtu/hr need BACT, boilers over x mmbtu/hr BACT and source test, chrome tanks over x ft^2 need risk assessment, etc.).	1.27
Work Flow	3. Permanent group of "meeters" provide answers within 24 hours or permit fee is waived, must stick to answer or permit fee waived; promote consistency.	1.24
Permit Support Systems	10. Publicize list of manufacturers approved for the over-counter permits. • Place list of manufacturers approved for the over-counter permit process on the web. • Give permit services the list of manufacturers approved for the over-counter permits.	1.22
Permit Support Systems	14. Create a checklist per form for prescreeners to verify application completeness (add QA/QC).	1.22
Permit Support Systems	15. Create a computerized tutorial or expert system for filling out applications (education).	1.22
Permit Processing	16. Develop a BACT manual (education, standardization). • Publish BACT guide lines as they become available on the web. • Publish new version of BACT guidelines. • Implement BACT review committee to finalize actions.	1.21
Permit Processing	22. Rule 1401 - drastically simplify Rule 219 requirements, allow satisfying Tier 2 as a means to have equipment remain Rule 219 exempt.	1.18
Work Flow	11. Create a detailed criteria for rejecting permits.	1.16

Category	Solution	Score
Management	21. Reward units or divisions that better business practices.	1.16
Permit Processing	23. Create forum to resolve inconsistencies and polices between units. Part of lack of standardization is lack of forum to interact and compare policies and standards.	1.14
Permit Support Systems	23. Establish AQMD permitting homepage (4.1.1 2) • Put links to technical data on AQMD web page (e.g. EPA AP-42). • Put default emission factors on the AQMD web page.	1.11
Tracking	8. Assign a unique number to each piece of permitted equipment and store all historical data under the equipment number, currently historical data has to be traced from modification to modification (each request can take a day). This would allow equipment to be traced if sold or relocated (i.e. inter-facility tracking).	1.11
Management	18. Reduce QA/QC load by standardization of permit process.	1.11
Work Flow	14. Create a precertified module for emergency ICEs.	1.10
Work Flow	43. Amend Rule 219 to exempt standardized *de minimis* emission levels.	1.10
Tracking	2. Develop standard permits with basic equipment minimum requirements.	1.10
Tracking	3. Develop a method to track source test, risk assessments, and CEQA reports electronically that is tied to the application number, so that the engineer knows if such documents have been received and where to find them. • Develop a database management system to track location of the applications between locations and notify managers electronically. • Track all permit applications in database; immediate ID assignment. • Use bar codes for tracking. • Bar-code permit application folders. • Use bar codes to track all application related material such as source test, risk assessments, CEQA, etc. (currently applicants complain that District loses supporting documents).	1.10

Category	Solution	Score
	• Add a way to associate electronically the permit or application number as part of each transaction. (less confusion, numbers assigned by prescreening now.)	
Management	7. Increase training and incentives for staff engineers, consultants and businesses to improve applications policy consistency.	1.09
Fees	15. Create a fee worksheet for the applicant (ease and standardization).	1.08
Work Flow	4. Engineers should be allowed to prescreen from their desks (so information is available when applicants call back.	1.08
Work Flow	32. Have prescreeners reject applications that are missing additional required reports or information (BACT, source test, risk assessment, ERCS).	1.08
Management	16. Require managers to submit business plans for their divisions. • Require business plans to include efficiency and cost reduction. • Hold managers accountable to business plans.	1.06
Tracking	6. Assign a team to investigate the wide disparity in the time to process similar equipment between the units. Apply streamlining techniques used by the more efficient unit to the other units and post practices to increase standardization. (Fee Schedule Analysis)	1.05
Tracking	9. Accountability/Tracking • Implement a project management program for applications; one engineer performs all the analyses; assumes accountability. • Project sheets - use application numbers as code numbers (30-minute increments). • Connect projects sheets with timecard system (new system is capable). • Use capabilities of PeopleSoft to track time spent on applications. (Fee Schedule Analysis) • Track time on timecards spent on applications (same bar code).	1.05
Permit Processing	3. Limited Internet access • Modify the current security to allow all employees access to selected government internet sites (less time in library and research). • Have information management develop - intranet mirror of important sites.	1.04

Permit Processing	15. Have specialized staff for various source categories.	1.04
Work Flow	18. Registration or Permit-By-Rule. • Issue over-the-counter (or Internet) Permit to Construct Registration for any equipment for which a P/C Registration Protocol is developed. • Consider Certification and Registration (C&R). • Register small sources rather than submitting them to the standard permit process (reduce amount of time). • Issue general permits for classes of sources. Register any equipment for which a P/C Registration Protocol is developed. • Encourage more manufacturers to certify equipment instead of requiring end-users to get permit (like R1111, 1121, 1146.2). • Establish and execute more equipment to be precertified. • Fund expansion of over-the-counter permitting.	1.02
Forms	10. Examples, i.e. Prefilled out forms	1.02
Forms	3. Simplify permit application forms. • Revise forms color code information that is mandatory or application is rejected automatically. • Place wording on 400A Form that states that application will be rejected if entire form is not completed. • Include a checklist of required information with application. • Create permit application forms that are easy to read (font on current forms is too small). • Have more precertified equipment to qualify for registration. • Ensure that application forms and data entry programs include the essential information and organization in a consistent, logical, efficient and easy-to-use manner.	1.01
Permit Support Systems	25. Accelerate WARP II implementation.	1.00
Permit Processing	17. Create an automated computer expert system (ACES) to assist permit processing and keep data on unique equipment.	1.00

Permit Support Systems	22. Develop instructions for Tier I and Tier II for applications that require risk assessment and potentially will require Tier III. (If a facility greatly fails Tier II, it knows a Tier IV risk assessment is needed.)	0.99
Permit Support Systems	33. Permanent Lobby Duty staff. Currently data entry staff take turns 2 days/month. Cannot do normal duties from lobby. Use staff that can interact with industry and answer questions and concerns.	0.99
Interactions	6. Develop training and cross training programs across permitting, source test, health risk assessment.	0.99
Permit Support Systems	30. Keep fee sheets current in database, data entry does half calculations manually from manually generated sheets because database is not updated.	0.98
Work Flow	12. Return incomplete applications immediately with explanations. • Applications screened for major omissions when submitted and immediately rejected if omissions are found.	0.97
Permit Support Systems	16. Reduce redundant data entry by capturing data entered during prescreening in the database. • Have prescreeners enter what additional elements are required before approving permit. (BACT, source test, risk assessment, ERCS) so engineers do not have to reevaluate what is missing again when they receive the application.	0.96
Work Flow	31. Combined authority to construct and permit to operate for sources that do not have to be source tested. (Table 4-1)	0.96
Interaction	10. Present to the public the legal and practical implications of certain processes: HRA (screening refined), BACT, etc. to help them better plan, redesign or cancel plans before submitting applications.	0.96
Permit Processing	13. Develop training and cross training programs	0.95
Interactions	5. Designate an engineer with source testing experience to each unit.	0.95
Permit Support Systems	35. Create pamphlets to instruct on completing application forms.	0.94
Permit Processing	1. Complete a users manual for CAPPs or replacement computer system.	0.94

Work Flow	9. Limit the amount of time an application can remain in the prescreening process before automatically rejected.	0.94
Work Flow	15. Have expedited permitting for minor sources.	0.94
Work Flow	41. Consider spray booth replacement as a modification. If the basic coating operation is not changed and emissions are not increased, BACT should not be triggered.	0.94
Permit Processing	4. Allow full access to the internet and monitor activities.	0.93
Permit Processing	26. Require engineers to attend certain number of field evaluations to increase experience. Engineering and rule evaluations are desk jobs now, reducing actual hands-on experience.	0.93
Work Flow	8. Assign a person responsible for resolving applications held in prescreening more than 7 days.	0.93
Work Flow	50. Create team to find the largest bottlenecks and apply express processing to those areas.	0.93
Forms	6. Standardize application format for CPPs.	0.93
Management	19. Hire management that have proven management skills.	0.93
Permit Processing	6. Reprioritize, Require engineers to process applications in a certain order to ensure that lengthy or time-consuming processes are completed up front (BACT, emission offsets, health risk assessments, source tests, or public notification) (facilities may cancel application or alter if original application is noncompliant).	0.92
Work Flow	5. Have full-time prescreeners to increase consistency.	0.92
Management	23. Develop rotating audits to help reinforce management goals.	0.92
Permit Processing	21. Improve NSR module/procedures, data should automatically be copied over to new applications for all administrative change applications.	0.91
Work Flow	33. Have prescreeners send out letters to applicants that need BACT, source test, risk assessment, ERCs.	0.91
Management	2. Remove "three strikes" policy for CPPs.	0.90
Work Flow	6. Make prescreening the key position. • Add incentives to become a prescreener (increased pay or title for this as a full time position).	0.89

Work Flow	13. Prescreening – eliminate, transfer responsibilities to processing engineers. • Let individual units receive and issue permits (i.e. eliminate permit processing and prescreening.	0.89
Work Flow	28. Deem complete/incomplete in less than 30 days.	0.89
Management	6. Allow engineers to add conditions to the standard conditions as needed.	0.89
Fees	3. Incomplete Fees or Forms • Increase the penalty for incomplete applications as a deterrent.	0.88
Interactions	7. Have IM present streamlining team with on-line capabilities and planned additions. • Keep same team of engineers and District streamlining members throughout the duration of long and major IM projects (changes to the personnel often cause the retraining of new members and redesign of newly programmed systems to please new team not necessarily because changes are beneficial. • Train users that interact with IM with the processes in question, especially teams that have input on large systems (it is unwise to have managers who do not use the system critique the system). • Develop system to keep IM informed, policies need to systematized and give to IM else they will not be incorporated or planed for in the design and program of new and existing systems.	0.88
Work Flow	7. Change prescreen policy to one phone call, not three.	0.87
Tracking	7. Assign a team to investigate the amount of time and effort required to modify or change conditions on a permit. Engineers have complained that the historical and new research are unavailable or not useful. (Fee Schedule Analysis)	0.87
Work Flow	21. Green carpet program.	0.86
Permit Support Systems	12. Add a keyword search capability in the Prescreening system (reduce time).	0.85
Interactions	2. Improve coordination with economic development corporations and small businesses in explaining the permit process.	0.85
Management	1. Provide CPPs consultation space at AQMD (free or cost).	0.85

Permit Processing	30. Allow facility permits to be printed in parts, currently only whole permit can be printed.	0.84
Work Flow	30. Create penalty for failure of District to meet 7/30/180 designation.	0.84
Work Flow	45. Develop intranet system for improving internal communication.	0.84
Forms	8. Send facilities the "inspectors view" Title V permit (all wording and conditions per permit unit on one form.	0.84
Fees	2. Assistance to applicant • Institute a Rule 301 hotline to help people calculate fees.	0.83
Permit Support Systems	20. Test CPPs • Require CPPs to periodically submit a mock application. (education, QA/QC) • The CPPs must pass predetermined level of completeness and accuracy to berecertified (education, QA/QC). • Record data on CPPs for better evaluation.	0.83
Management	24. Promote customer satisfaction for internal and external clients, through feedback forms. • Provide a formal means for feedback from industry on the Permit Processing. (Table 4-1)	0.83
Permit Support Systems	29. Update BCAT/CCAT (used by AQMD to calculate fees, not seen by public) to match Rule 301 (used by public). There have been credibility issues when fees do not match.	0.82
Permit Support Systems	34. Give all staff ability to print e-mail. Some permit services staff cannot print out e-mail sent to them by engineers to attach to files.	0.82
Permit Processing	24. Train staff on Rules. Summaries of impacts of rule changes on permit process. (e.g. restore Rule Interpretation Group).	0.82
Work Flow	35. Fourteen day turnaround for CPP applications.	0.82
Management	26. Develop management by objectives reviews in which employees set goals and growth plans with superiors.	0.82
Management	28. Use TQM system (e.g. ISO 9000, 14000) for continuous improvement.	0.82
Permit Support Systems	1. Require all applications to be submitted electronically; electronic 400A and 400 Ex forms can prevent acceptance unless complete. • Require all facilities who submit annual fee reports electronically to submit permit applications electronically.	0.81

	• Require all RECLAIM or Title V facilities to submit permit applications electronically. • Accept applications via fax or e-mail.	
Permit Support Systems	11. Continue to load all application software to local hard drives on desktop computers (able to work when network is down).	0.81
Work Flow	47. Covert Liberty to intranet (currently on network) to expand the number of users and increase access speed.	0.81
Management	25. Provide management and productivity skill classes.	0.81
Management	15. Decide ideology moving all permits toward facility type permits, or toward single permit unit permits (policies tend to swing back and forth undoing each other).	0.80
Management	27. Require management and productivity skill classes for employees that are not meeting goals agreed to by employee and supervisors in previous reviews.	0.80
Interaction	11. Have IM show substantive changes to programs, i.e. training on where and how to use these changes.	0.79
Permit Processing	11. Make applications for equipment without a written permit a higher priority than applications for permit to construct before construction because potential violation is high.	0.78
Permit Support Systems	9. Place CPP policies on the web.	0.77
Permit Support Systems	6. Allow funding to reconfigure network as needed (the increased stability over the past year occurred because of reconfiguration, but with so many new systems, WARP, FPPS, SSPS, RACER, electronic timecards, the system needs to have more flexibility in updating and reconfiguration.	0.76
Permit Support Systems	18. BCAT/CCAT - eliminate assignment of these codes during permit processing.	0.76
Tracking	5. Minimize duplication ID creation by giving applicant preprinted labels for 400A.	0.76
Interaction	8. Create a division that fields compliance and planning issues for industry that is not tied to enforcement (Allows anonymous questions).	0.76
Permit Support Systems	13. Add a computer fix to prevent data entry staff from entering data that conflicts with information input by the SSC engineer (error reduction).	0.75
Permit Processing	18. Add QA/QC and editing functions to CAPPS or replacement system.	0.75
Work Flow	34. Authorize direct access to application files for CPPs.	0.75

Work Flow	52. Clarify responsibilities between engineers and data entry on RECLAIM/facility change of ownership.	0.75
Management	3. Define “three strikes” against CPPs.	0.75
Permit Processing	27. Archive facility permit information. Information is lost electronically during modification. Previous evaluations or changes are not known to current evaluating engineers.	0.74
Work Flow	36. Open Records Section to permit processing staff at all times. (Currently only open during business hours). • Open Records Section to express permit processing staff at all times.	0.74
Management	29. Conduct brainstorming session with AQMD with applicants.	0.74
Permit Support Systems	19. Provide search capabilities for BCAT/CCAT by number and description.	0.73
Permit Support Systems	2. Establish policy to make network PC- or Server-based.	0.72
Permit Support Systems	24. Use imaging, electronic workflow and other IM technologies for a paperless system initially for simple then complex equipment.	0.72
Permit Support Systems	32. Remove need for previous permit number at data entry level; just use application number to track and label new applications. Modifications and Change of Ownerships need previous permit number, before labels are made. Data entry people can’t correlate, need engineers.	0.72
Permit Processing	5. Develop PSD modeling and analysis methods (create educational document).	0.72
Tracking	10. Develop aging reports for managers, supervisors and engineers.	0.72
Forms	5. Equipment oriented Title V • Staple existing permits and add EPA requirements for Title V (Equipment based permit processing philosophy). • Staple existing permits after re-entered and stored to save for future Title V changes and add EPA requirements for Title V (Equipment based permit processing philosophy).	0.72
Management	8. Contract engineers or specialized staff for unique assignments.	0.72
Permit Processing	29. Have RECLAIM applications scanned or filed with Records. Currently files are kept with engineers.	0.71

Management	17. Budget unit money based on business plan projections.	0.71
Permit Support Systems	4. Make network Server-based because there are plenty of PC and walk up stations, but when the server is off line e-mail, intranet, internet, Liberty, Central Information Repository database access to Ingres (finance, permitting, etc.) cannot be accessed.	0.70
Permit Support Systems	7. Move to Microsoft NT • Upgrade to Microsoft NT (allows use of current MS application on the desktops such as outlook; updates to NT and Windows will upgrade netware; and better integration of network with desktops). • Replace Beyond Mail with Outlook (e-mail, scheduler, etc.) which is already on desktops (plus updates for Outlook come with MS operating systems, Beyond Mail upgrades must be purchased separately).	0.70
Tracking	1. Systematically correct all data errors in tracking system.	0.70
Forms	9. Develop and implement a Form 400-CEQA to be completed by applicants.	0.70
Fees	1. Accountability/Fee Study • Record actual time spent on each application, so Fee Study group has actual data to average.	0.69
Fees	12. Make applications submitted by CPPs half price.	0.69
Permit Support Systems	27. Allow more than one person the authority to reject applications (i.e. send out letters). Currently, only one persons is authorized	0.69
Permit Support Systems	28. Update BCAT/CCAT to consolidated instances of duplication to ensure the similar equipment BCAT/CCAT received the same fee.	0.69
Work Flow	51. Establish facility permit processing software (FPPS) Explore commercially available software packages for AQMD or permit applicant use.	0.69
Management	14. Allow flexible work hours including 5/8 week, job sharing, etc. to maximize available permit engineering hours and provide different after hour express permitting time.	0.69
Permit Processing	7. Treat relocations as modification not new facilities. • Exempt straight relocations from BACT requirements.	0.68

Forms	1. Redesign Form 400A ; remove Title V information from 400A.	0.68
Fees	5. Efficient Check Processing • Remove checks from applications immediately and process them instead of holding them until after preprocessing or prescreening. • Immediately assign an application number to an application when received despite complete or fees. • Associate check with application given at time received (i.e. assign application number immediately upon reception). • Deposit check immediately upon receipt. • Do not put finance hold on application if total fees paid exceed fees due. • Automation of accounts receivable and CLASS system to enable automation of refund check processing.	0.67
Permit Support Systems	31. Search or drop down Zip Codes that are easily updated (as new ZIPs are added) in database to aid in processing and mailing.	0.67
Permit Processing	8. Redefine "achieved-in-practice" for LAER and BACT to include only those installed to comply with air pollution regulations. • Refer BACT issue to BACT SRC re LAER determinations. • Reevaluate BACT/LAER issues for R1151 and other low emitting equipment. • LAER determined when application is deemed complete. • Empower BSRC, ombudsman.	0.67
Management	9. Dugout processing sessions.	0.67
Permit Processing	19. Upgrade CAPPs to Windows based system.	0.66
Work Flow	49. Add entire permit process to after hour express permit processing not just the permit evaluation engineers.	0.65
Forms	2. Redesign Form 400A divide the non-Title V 400A into two parts, one for facility and company information, one for information on equipment.	0.65
Management	20. Hire consultants to critique business practices.	0.65
Fees	4. Make fee applicability based on application postmark.	0.64

Permit Processing	31. Assign a team to investigate the amount of time spent acquiring information for incomplete applications. (Fee Schedule Analysis)	0.64
Work Flow	37. Data entry staff to work directly within unit (i.e. instead of in permit services).	0.64
Work Flow	44. Tie the CLASS system to integrated Voice Response (VR) for applicants to check status of application. Do the same with the Internet. (	0.64
Management	12. Use data technicians to work on Facility permit revisions and administrative modifications.	0.64
Fees	10. Renew operating permits every 5 years (reduce work for annual fees).	0.63
Permit Support Systems	3. Make network PC-based to allow productivity (word processing and spreadsheets only) when network is down (which has not happened recently).	0.63
Work Flow	29. Reevaluate 7/30/180 designation, prioritize based on current requirements (e.g. 7/60/120). 180-day designation is no longer a required limit but 120-day designation is a regulatory standard. • Reevaluate 7/30/180 designation against the actual time it takes to process permits. • More realistic designations and additional categories (14/30/75/120).	0.63
Interaction	9. Present and describe the permit process (sequence) to industry to help them understand the process.	0.63
Permit Processing	12. Create a separate division to handle equipment without a written permit to insure that these permits do not hold up applications filed before construction or modification.	0.62
Work Flow	27. Consolidated permitting schedule for all sources within a facility.)	0.62
Tracking	11. Track when permits are sent out. Engineers do not know where permits are after printing.	0.62
Permit Support Systems	5. Create a LAN for each floor to minimize effect of one or more servers failing (work could be done off LAN instead of overall network, until network is stabilized).	0.61
Work Flow	19. Develop an Accelerated Permit Program (APP) to allow a qualifying air pollution source or abatement device to be installed and operated under a temporary permit to operate.	0.61
Work Flow	17. Expand PR222 Registration concept to include additional area sources.	0.60
Interactions	4. Add additional CEQA questions to the existing 400A.	0.59

Interactions	3. Require engineers to screen for CEQA, not applicants. • Maintain single CEQA question on forms. (	0.58
Permit Processing	10. Create task force to evaluate the risk of placing applications for equipment without a written permit on a lower priority than the applications for permit to construct before construction.	0.57
Management	22. Monitor phone conversations with public for quality assurance.	0.57
Permit Support Systems	8. Update web site more often, train more than one "web deputy".	0.56
Fees	11. Guarantee a maximum time (7/30/180) for permit review and issuance. • Amend Rule 301 to allow applicants to pay a reasonable amount of additional fees in exchange for AQMD guaranteed permit delivery time, refundable if time is not met.	0.54
Fees	8. Set up a debit account for qualified applicants to pay fees.	0.53
Permit Support Systems	21. Use "intelligent" SCC codes to identify equipment instead of BCAT/CCAT.	0.52
Work Flow	46. Issue general permits such as those of the Commonwealth of Pennsylvania, Department of Environmental Protection (PADEP).	0.52
Tracking	4. Do not use bar codes because it has the same limits as the current electronic system which tracks applications based on database activity.	0.52
Interactions	1. Improve coordination with other local, state or federal agencies • in building permits. • facility inspections • contaminated soil clean-up. • underground tanks inspections.	0.52
Permit Support Systems	26. Follow up on rejections letters. Were applications resubmitted, is the equipment operating unpermitted, or has the project been terminated?	0.51
Permit Processing	9. Training and certification of consultants. • Increase use of consultants to process application.	0.51
Work Flow	38. Divide permit services among engineering divisions and departments.	0.50
Work Flow	48. Hire consultant to review security measures in Ingres Database and provide suggestions to automate system.	0.50

	• Review Ingres Database security every time a large program like FPPS/SSPS is added. (4.1.5. Network Security-Ingres Database Updates)	
Fees	14. Track status of applications with missing or incorrect fees.	0.47
Permit Processing	25. Designate team to update NSR.	0.46
Work Flow	25. Tiered Emission Packages (TEP).	0.45
Work Flow	10. Create team to Reevaluate Prescreening process.	0.44
Fees	13. Recategorize the BCAT/CCATs within the Fee Schedule to better match the current processing cost.	0.43
Fees	6. Accept applications with 85% fee paid, 45 days for balance.	0.42
Permit Support Systems	17. Return all permitting databases to (BCAT/CCAT) system.	0.42
Work Flow	26. Consolidation (facility permits) into one program.	0.42
Work Flow	24. Umbrella Permit (UP).	0.40
Permit Processing	14. Place incomplete applications in low priority.	0.39
Work Flow	23. Limit the number of rejected applications, because applications are submitted incomplete because facilities are not familiar enough with regulations or lack adequate technical ability to complete applications.	0.39
Work Flow	40. Renegotiate with EPA the designation of Extreme Ozone Nonattainment based on the new 8-hr ozone standards.	0.39
Fees	7. Allow electronic fund transfer credit cards, or Fax-A-Check for application fees to promote Internet application submittal (electronic prescreening, instant payment of fees).	0.38
Management	11. Have multilingual staff.	0.38
Work Flow	20. Create satellite permitting centers.	0.36
Permit Processing	28. Have permit services send out facility permits like regular permits. Facility permits are sent out by units, therefore no secondary quality control is completed.	0.35
Permit Processing	20. Bifurcate NSR permitting for major and nonmajor sources.	0.32
Work Flow	39. Eliminate the RECLAIM program and fold regulatory requirements from RECLAIM into other programs.	0.30
Work Flow	42. Amend Reg. 17 (PSD) to level with federal program and temporarily suspend PSD delegation while Reg. 17 is being amended.	0.30

Management	13. Implement an emissions reduction analysis test for applications.	0.26
Management	10. Inspectors evaluate nonpermitted sources.	0.19
Work Flow	22. Accept all applications whether complete or not.	0.12
Work Flow	16. Have an appeals process for expedited permitting.	0.07
Fees	9. Include fee payment in loan guarantee programs.	-0.01

Appendix D

APPLICANT AND AQMD STAFF BRAINSTORMING SESSIONS AND ADDITIONAL IDEAS

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Additional Ideas Developed After Ranking Was Completed

Additional Ideas Developed After Ranking Was Completed and provided as comments by permit streamlining task force members Greg Adams, Ann Hempelmann, and Martin Ledwitz

1. Appoint one person to oversee and ensure streamlining ideas are implemented.
2. Appoint a single engineer to an application. Set a schedule for completion that is agreed upon by manager and applicant. Assign alternate engineer, if primary engineer has an extended absence.
3. Complete time/motion study for whole permitting process (i.e., include permit counter, permit services, prescreening, manager review and mail room as well as permitting engineers in the process). Eliminate or improve delays based on the study.
4. Examine the use of consultants or CPPs for whole process (i.e., from prescreening to issuance and mailing of permits).
5. Once the equipment-based permits are converted to Facility Permits, any modification to equipment should be evaluated based on the permit information in the facility permit rather than going back to the old equipment based permits. This is because companies have been told by AQMD that the old permits are no longer valid.
6. Have management work with union representatives in implementing work practice change.
7. Reorganize SSC according to type of equipment. Under old system based on type of equipment several applications can be completed at one time. Under current industry-based units, all applications are assigned to one engineer, who can only work on one permit at a time.
8. Applications should be completed on a project-based system based on the complexity and pace requested by the applicant instead of the 7/30/180 prioritization. Eliminate pre-screening as it exists today and give this responsibility to the actual engineer assigned to the project. Also revise 400A application forms to specify critical information needs that could cause rejection of applications.
9. Evaluate engineer/computer program interaction. Are the engineers slaves to the programs or are the programs tools for the engineer. Use a flow chart to show all interfaces of these permitting programs with engineers.
10. Make total quality management or continuous improvement goals of the entire organization instead of one person's job.
11. Permit Streamlining needs to be supported by all management, staff and Board members so that the person in charge can evaluate the costs and minimize impacts on resources when discretionary activities are taken.
12. Fax acceptance letter to save on postage and time. Examine the possibility of batch faxing acceptance letter by computer at end of each day.
13. Establish uniform cut-offs for receipt of information needed to complete applications.
14. Assign the Small Business Assistance Office the task of expediting the flow of information and assisting small businesses in understanding the permitting process. Train their staff to better help smaller applicants.
15. Outsource source test and CEMS review.
16. Set a trigger level for natural gas usage, under which toxic analysis is exempt.

17. Evaluate the effect of accepting any fees within 85% of the correct fee. Will this help or hinder the completion of an application.
18. Having only one Title V manager familiar with EPA standards could create bottlenecks. Redesign application forms to eliminate unnecessary information requests, separate Title V queries, and identify critical elements, etc.
19. Evaluate any tracking system to ensure that the system does not unnecessarily burden staff.
20. Have Title V subworkgroup spend more attention to improve the ease in which modifications to the Title V permits are completed.
21. Provide a confirmation code with fee or permitting advice given on hotline.
22. Complete a time motion study to establish a baseline for the amount of time spent on an application.
23. Fees should not be increased for incomplete applications, since the applications are difficult to fill out and thorough guidance is not available.
24. A study should be completed that examines the effect of only evaluating only critical rules: NSR, 1401 and any applicable source specific Reg XI rule.
25. CEQA language should not be included in the permit application.
26. Permit engineers should be trained in all air dispersion modeling rather than sending applications to modelers in the planing division. CPPs complete the entire process.
27. District permit engineers should be required to pass the same exam the CPPs take. Engineers should be able to evaluate the entire application without having to transfer applications or support documentation to other divisions.
28. Use permit by rule and registration to increase fees to cover the cost of annual inspections.
29. Investigate New York's permitting system written from the ground up solely to process permits.
30. Evaluate San Diego's and other incentive programs for permitting engineers.
31. Compare benchmarking studies with work processes and time spend by the District with other entities.
32. Each member of a project team (District employees and permit applicants) for any given application should know of and agree to the schedule development during project planning and their obligations within it.
33. All project team members must know that they will be evaluated on their performance on these projects and their ability to meet deadlines. Missed deadlines without satisfactory explanations must be handled as performance issues.
34. A single point of contact responsible for answering applicants' questions and ensuring the permit is completed in a timely manner.
35. Develop efforts to view permits as a product the District delivers to its constituency.
36. The eventual permit engineer should be part of the pre-application conference.
37. The pre-application conference documentation should be available to the applicant later.
38. A 50% penalty added to the fee schedule of applications for equipment installed/operated while the District is processing the permit. This penalty should be waived if the applicant meets all their milestones, but the permit is inappropriately delayed beyond its expected approval date.

39. Evaluate the Gas Company's air toxics screening tool for gas-fired equipment. Explore expanding the program for non-gas-fired equipment.
40. Impacts on permitting should be examined when rules are revised. Permit processing timelines should be reduced to below 60 days since time estimates show less than 30 hours to process most of the applications.
41. Examine the management systems at BAAQMD. Develop similar schedules for the District.
42. Evaluate Gas Company's permit handbook for gas-fired equipment for incorporation into the District's permit handbook revision.
43. Examine creating a permitting ombudsman position.
44. Further the examination of the BAAQMD's Accelerated Permit Program and incorporate if possible.
45. Examine the possibility for the creation of a committee like the Los Angeles County Sanitation District's Industrial Advisory Council. The committee should provide input on the developments in the permitting process on a regular basis.
46. Rules should be revisited some time after adoption to determine unexpected impacts, level of compliance, level of effort needed to comply with the rule, actual cost of compliance and benefits of the rule. In protective Rules like 1401, it would be helpful to track how many facilities were screened at each level and how many passed or failed.