South Coast Air Quality Management District

Permit Streamlining Task Force Sub-Committee Meeting

February 15, 2007

2:00 - 4:00 p.m.

Conference Room CC2

Agenda

- Call to Order/Opening Remarks
- Proposed Draft of Permit Streamlining Task Force Suggestions/Recommendations
- WSPA's Permit Streamlining Recommendations
- Backlog Definition
- Permit Status Update
- Next Meeting Schedule

Permit Streamlining Unit Staff

- Two New Engineer positions funded and positions filled through intra-office transfer
- Tasks to be completed by the two new staff:
  - E&C Policy & Procedures consolidation, Restructuring, Updating & Posting on the Web
  - Permit Processing Templates to be developed for most commonly permitted equipment with standard evaluation and conditions
  - Enhancements to Intranet Permitting page by consolidating all permitting tools into one place.

Proposed Draft of PSTF Suggestions / Recommendations

- Past Permit Streamlining Recommendations Summary
- Further Efforts Undertaken by PSTF
- Recommendations being Implemented as part of the $2 million Permit Streamlining designation
- Additional Permit Streamlining Recommendations developed

Past Permit Streamlining Recommendations

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

Further Efforts Undertaken by PSTF

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

Permit Streamlining Recommendations as Part of $2 million Designation

- Permanent Staffing (2 New Engineer Positions, One System Analyst in Information Management)
- Temporary staffing (Both Engineers and Clerical staff)
- Update of Policy and Procedures
- Develop additional Permit Templates
- System Enhancements
  - Redesign Facility Permit,
  - NSR Bypass for certain types of applications
  - NSR Link to Emissions Inventory,
  - Tracking System Title V/ Rule 212 applications

Additional Permit Streamlining Recommendations

- Develop aged application reports for use by management to process applications in a more timely manner
- Manager and staff reassignments to balance staffing and improve performance
- Workload reassignments to better balance applications distribution among permitting teams
- Consolidation of ERC applications processing in one team
- Development of a Fee Calculator and making it available on the web
- Hold regular (quarterly, semi-annual, and annual) meetings to discuss and update the status and progress in permitting
- Providing draft permits to applicants for review prior to release of proposed or final permits.

Additional Permit Streamlining Recommendations (cont'd)

- Prioritize processing of permits for installation of APC equipment
- Engineer positions funded by individual companies
- Update Title V Technical Guidance Document (TGD) and Frequently Asked Questions
- Change Title V thresholds
- Commit to process applications within 180 days and reduce backlog of application older than 180 days
- Hold regular meeting with large permit holders
- Update and improve AQMD's Permitting Website
- Establish a Permit Application Review Committee

WSPA's Permit Streamlining Recommendations

- District's Permit Processing database and software
  - Generate draft permits for review
  - Store more than one version of a permit
  - Highlight all changes made in draft permit
- Management review process for approving permits for issuance
  - Re-evaluate work flow
- Permit processing efficiency and consistency
  - Consistency in providing draft permits for review
  - Consistency in permit conditions for similar equipment
  - Conditions not supported by District rules
  - Permits long due to repetition and formatting
  - Create more permit templates
  - Positive approach by some engineers are appreciated and such approach should be the norm

Draft Proposed "Backlog" Definition

- **Class I Applications** (New Construction/ Relocation, Modifications, and Change of Conditions with change in emissions)
  - Major Sources (Title V and RECLAIM): > 180 days after deemed complete (> 210 days after submittal)
  - Non- Major Sources (w/o Public Notice): > 60 days after deemed complete (> 90 days after submittal)
  - Non-Major Sources (w/ Public Notice): >180 days after deemed complete (>210 days after submittal)

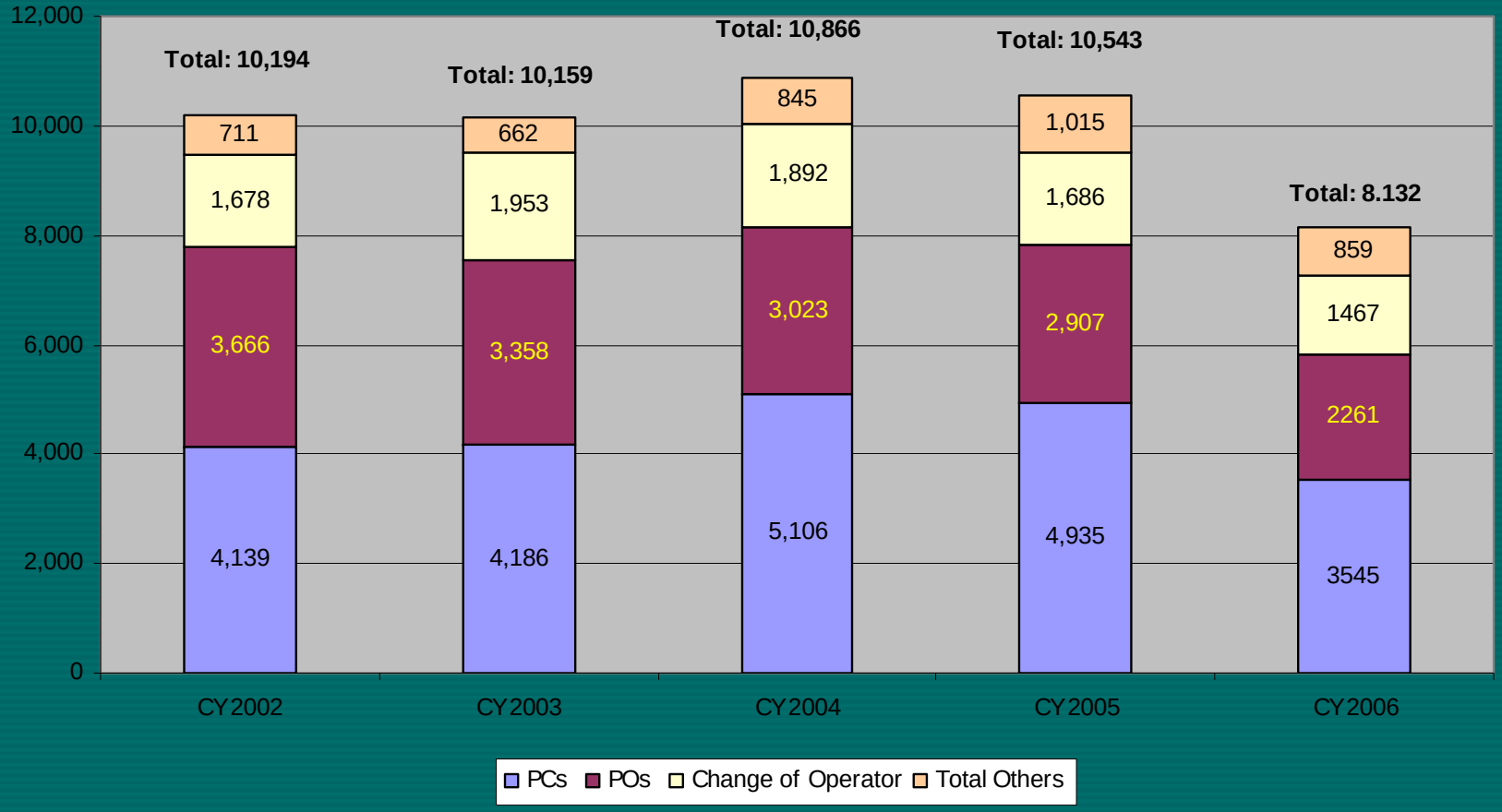
Draft Proposed "Backlog" Definition (cont'd)

- **Class III Applications** (Permit to Operate)
  - POs without prior PCs: > 180 days after deemed complete (>210 days after submittal)
  - POs with prior PCs: Should not be classified as part of the backlog
    - These applications are for equipment that are either on hold, under construction or if completed, are operating legally under their permit to construct
  - Plans & ERCs: > 180 days after deemed complete (> 210 days after submittal)
  - Change of Condition & Admin Changes
    - Major Sources: > 180 days after deemed complete (> 210 days after submittal)
    - Non-Major Sources: > 60 days after deemed complete (> 90 days after submittal)
  - Change of Operator
    - Major Sources: > 180 days after deemed complete (> 210 days after submittal)
    - Non-Major Sources: > 60 days after deemed complete (> 90 days after submittal

Application Processing Priority

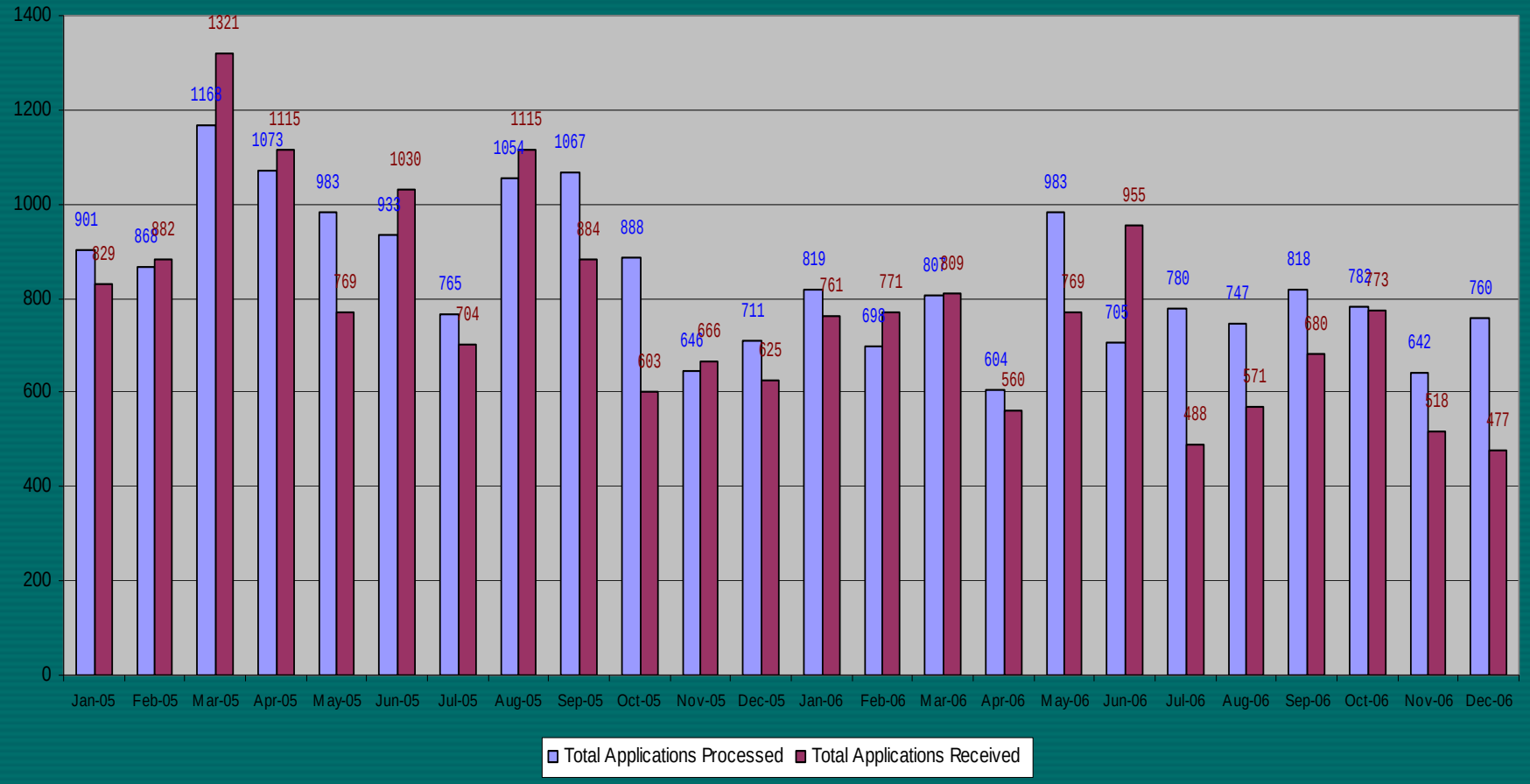
- **Priority no. 1:** a) Expedited Permit Applications (both for Permits and ERCs)
  b) Permit to Construct/ Relocation/ Modification
    - Subpriority 1: Air Pollution Control Equipment
    - Subpriority 2: New Construction/ Relocation
    - Subpriority 3: Modification
  c) ERCs
- **Priority no. 2:** POs no PCs
- **Priority no. 3:** Plans
- **Priority no. 4:** Change of Operators, Change of Condition, & Admin Changes
- **Priority no. 5:** POs with prior PCs

Permit Inventory Status - Applications Received

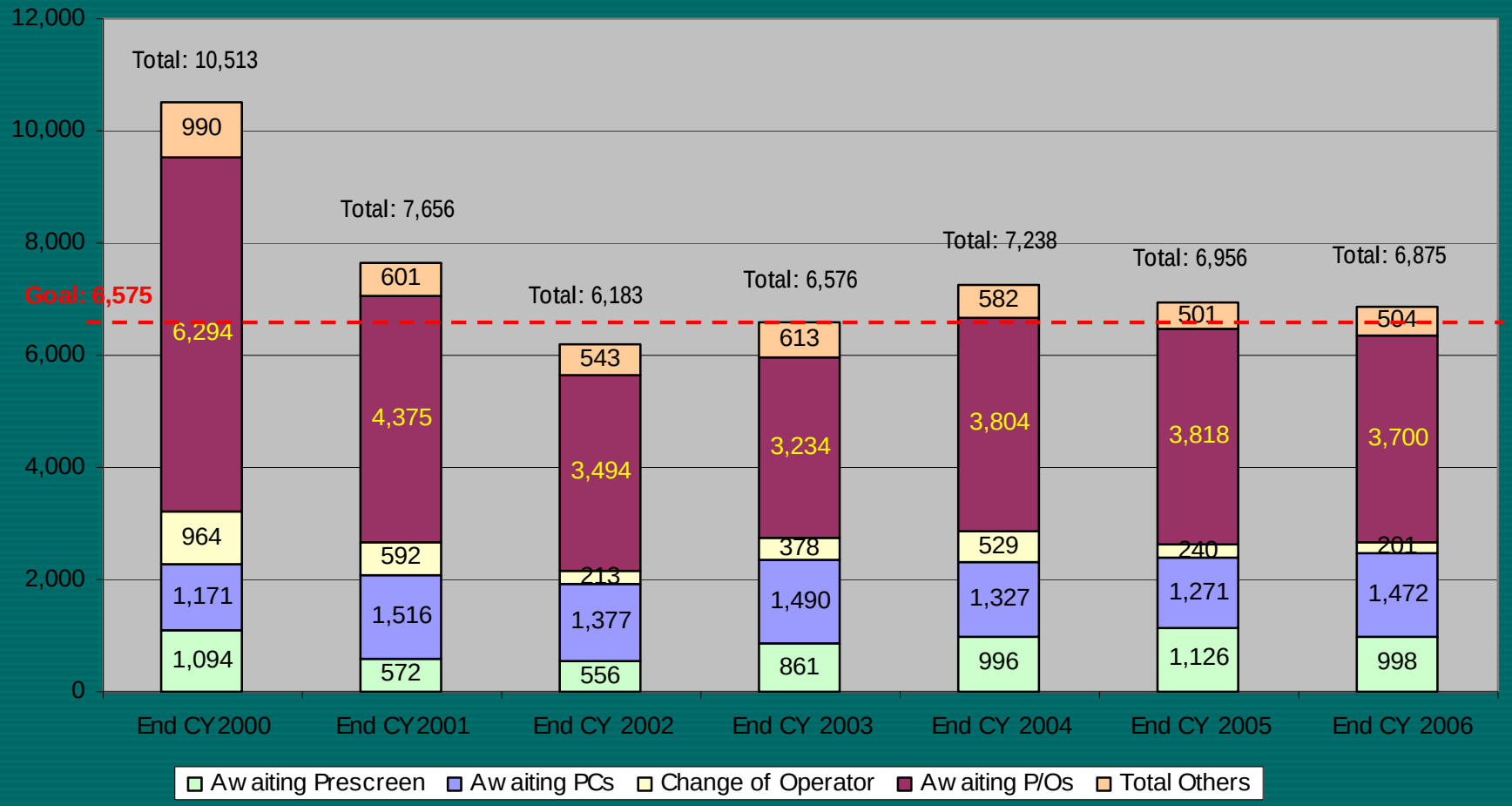


Permit Inventory Status - Applications Processed

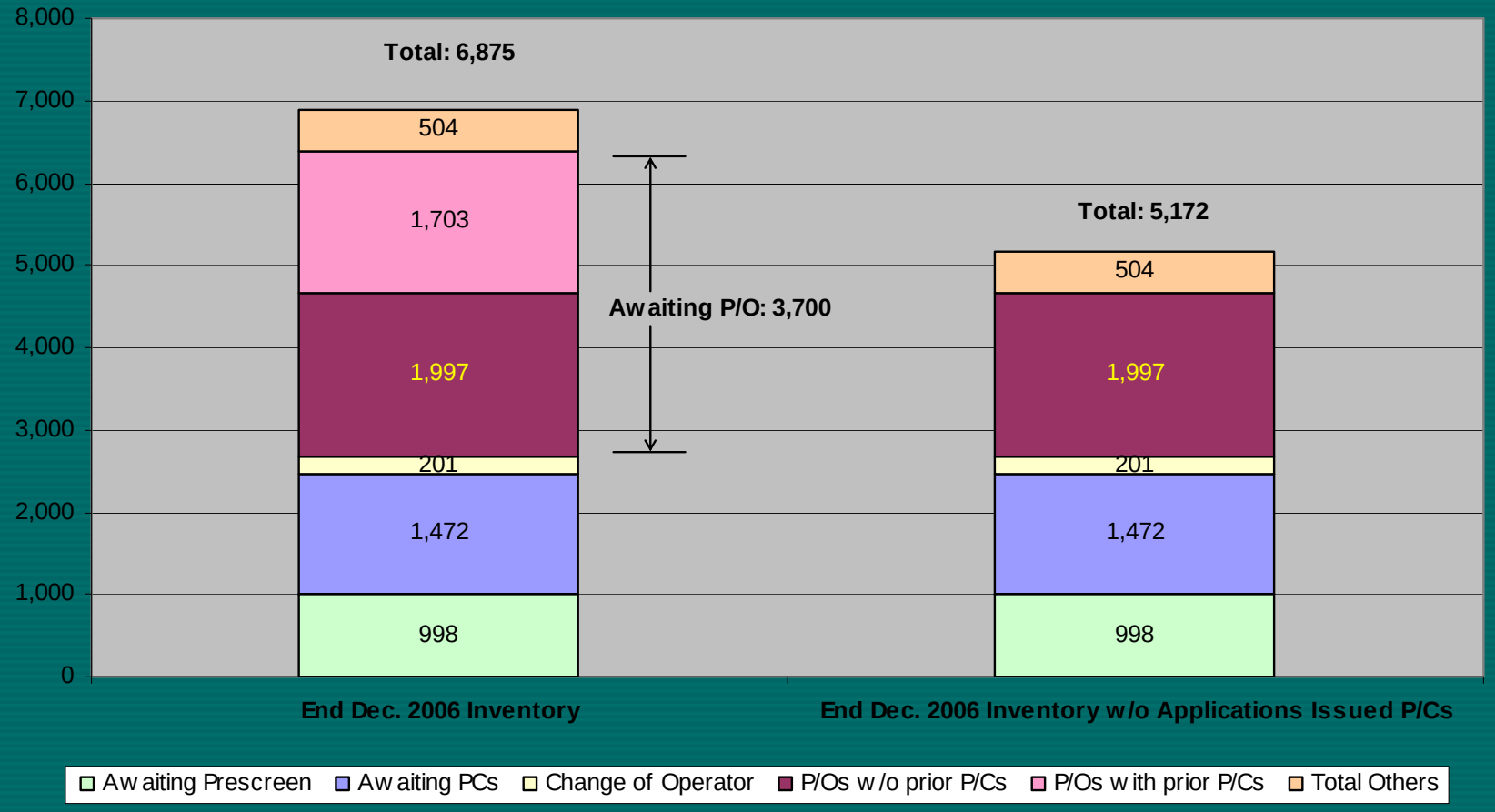
Permit Inventory Status - Applications Processed & Received



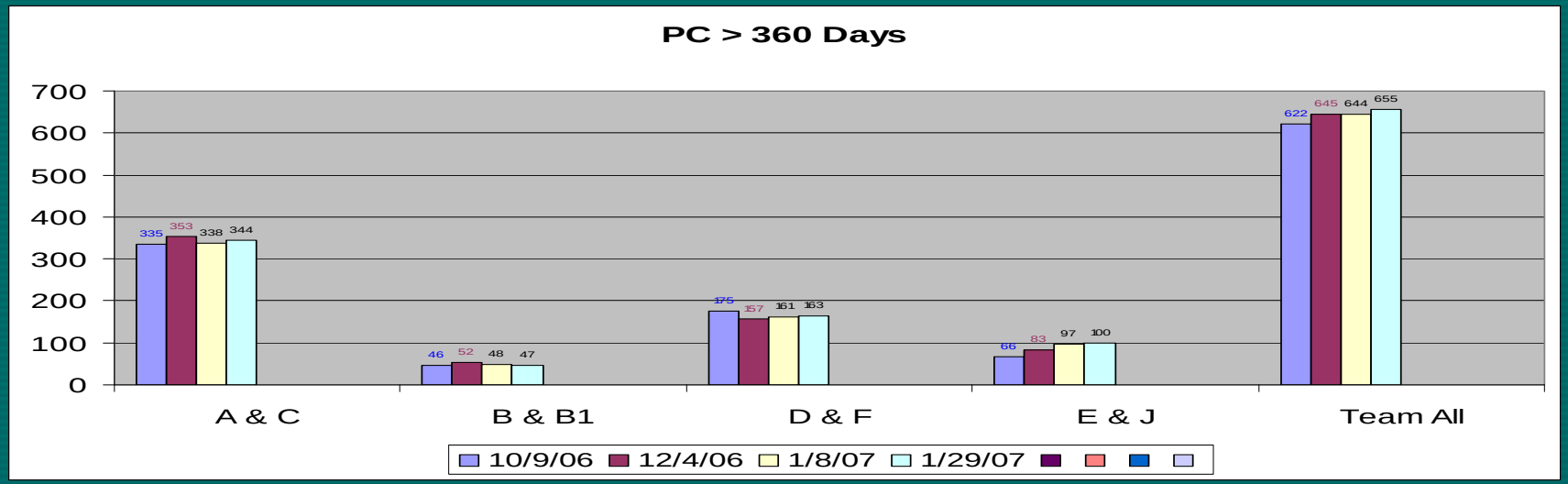
Permit Inventory Status - Applications Pending

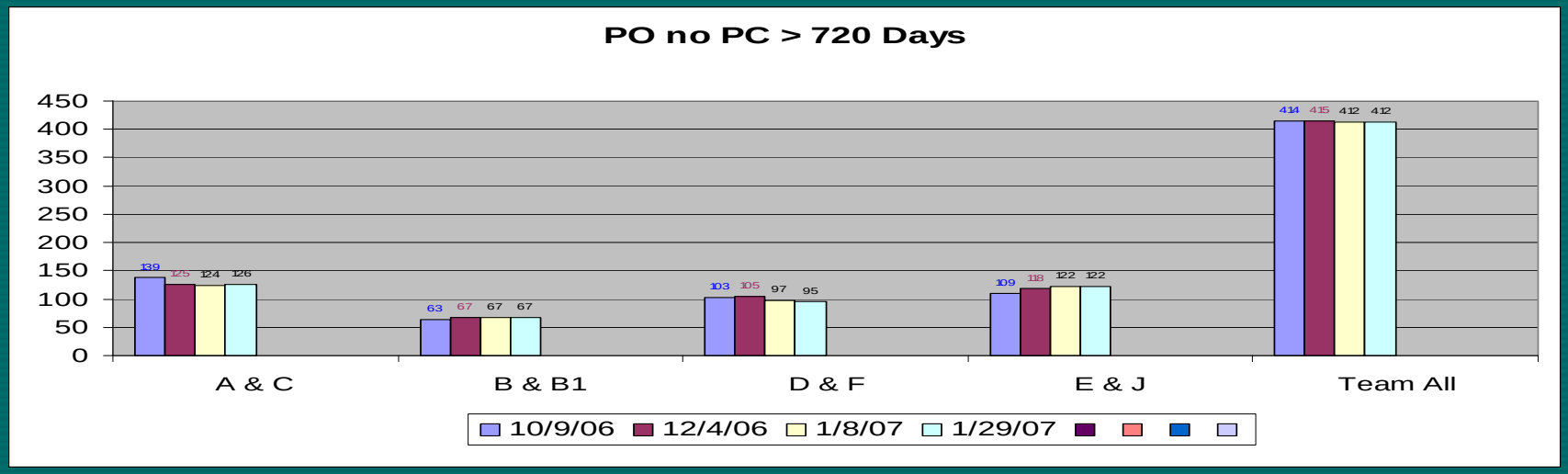
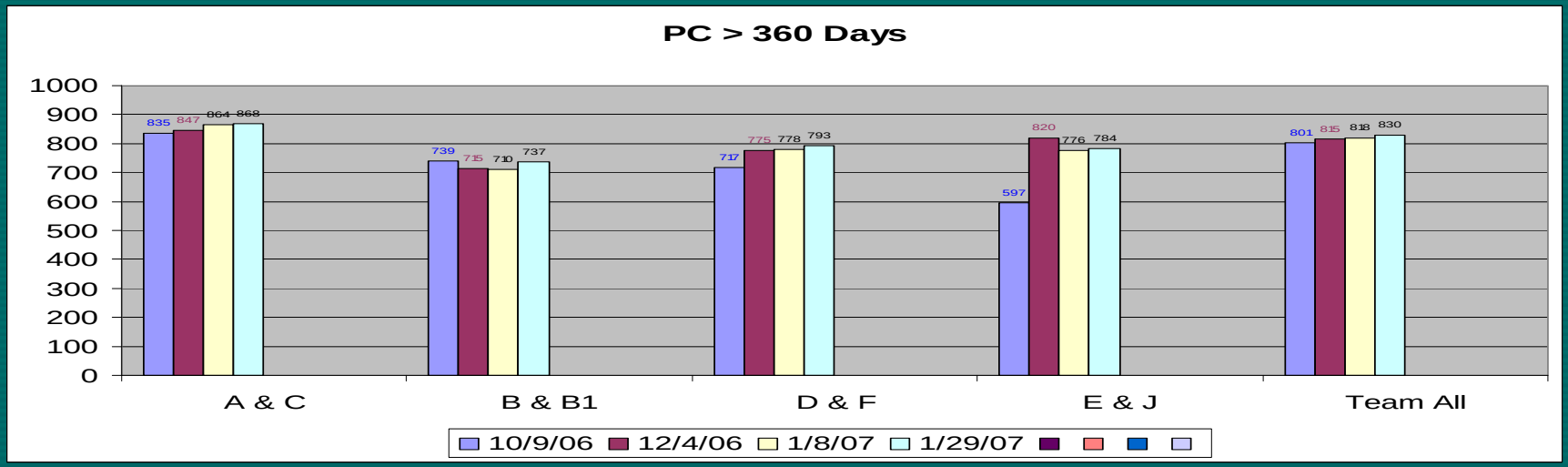
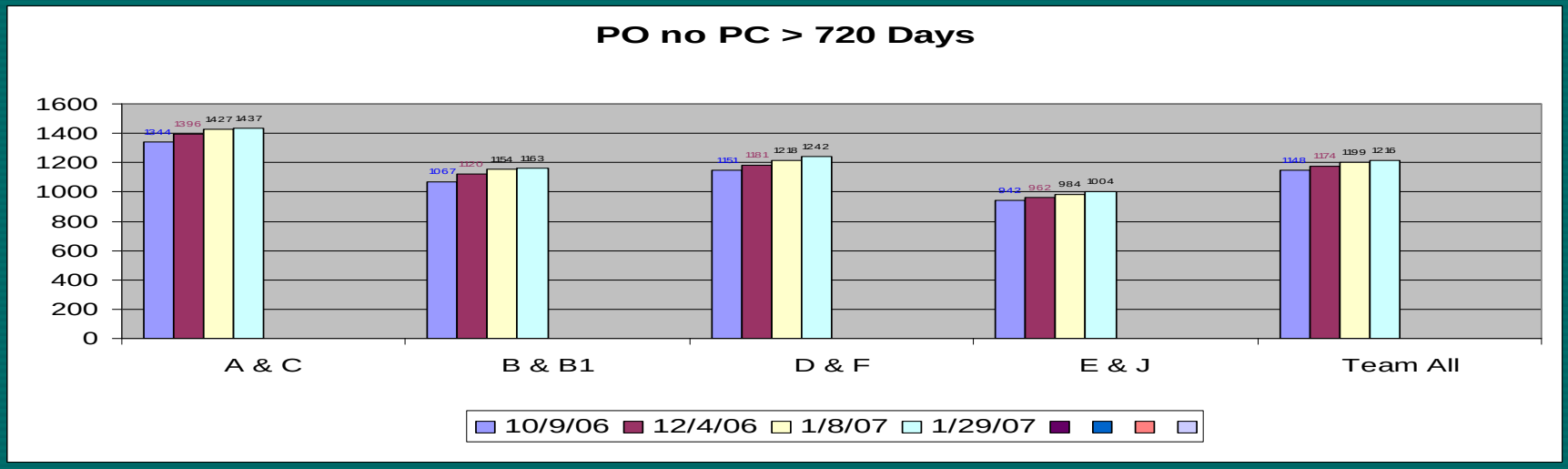


Permit Inventory Status - Applications Pending Breakdown



New Monthly Aged Application Report (Application Count)





New Monthly Aged Application Report (Average Age)