

# South Coast Air Quality Management District

## Permit Streamlining Task Force Sub-Committee Meeting

November 15, 2007

2:00 – 4:00 p.m.

Conference Room CC2

# Agenda

- Call to Order/Opening Remarks
- Update on the Use of Credit Cards to Pay Permit Fees
- Status Update on Permit System Enhancements
- Fees for Change of Title for Short Term ERCs (STERCs)
- Permit Inventory Status Update
- EPA Training on NESHAPs
- Other Permit Streamlining Issues
- Next Meetings Schedule

# Credit Card Update

- Submitted E-Commerce Readiness Assessment Questionnaire to LA County 's E-Commerce Readiness Group to asses AQMD's needs and readiness.
- Attended LA County's IT Staff Presentation Detailing Credit Card Transactions Through Link2Gov
- LA County Representative and their subcontractor (Link2Gov) assigned to work with AQMD
- Attended Department of Public Works (DPW) presentation on how the agency is using credit cards for permit approvals
- Held informational meeting between LA County, Link2Gov and AQMD staff (E&C, Finance, Legal and IM staff)
- Information presented to date indicates that AQMD can accept credit cards and service fee can be passed on to customers

# Permit Streamlining Update - Staff Augmentation & Training

Permit Streamlining Measures	Status
<b>Augmentation of staff</b> <ul style="list-style-type: none"> <li>•Permanent –Permit Streamlining (2 engineers)</li> <li>•Permanent – Information Management (1 System Analyst)</li> <li>•Temporary- Clerical (2 positions)</li> <li>•Temporary – Engineers (4 positions)</li> </ul>	<ul style="list-style-type: none"> <li>•Transfer completed and positions filled (January 29, 2007)</li> <li>•System Analyst hired (April 10, 2007)</li> <li>•Hired (Dec. 2006) – reissued 6,000+ permits for Rule 1470 emergency IC Engines</li> <li>•Two hired (Nov-Dec 2006) and extended for another 6 months. Processed 265 applications to date.</li> </ul>
<b>Staff Training</b> <b>MACT/NESHAP Training</b>	<ul style="list-style-type: none"> <li>•Completed training for 9 new engineers in March 2007</li> <li>•Title V Training for Engineers on Sept. 26-27, 2007</li> <li>•Soliciting bids from outside companies and in contact with USEPA on NESHAP training for staff and public</li> </ul>

# Permit Streamlining Update - System Enhancements

Permit Streamlining Measures	Status
<ul style="list-style-type: none"><li>Facility Permit Modification</li></ul>	<ul style="list-style-type: none"><li>Created list of changes and system enhancement based on engineer's input</li><li>Demo by BP for staff completed</li><li>Scoping meeting with IM completed</li></ul>
<ul style="list-style-type: none"><li>NSR-Emission Inventory link</li></ul>	<ul style="list-style-type: none"><li>Scoping meeting with IM completed</li></ul>
<ul style="list-style-type: none"><li>NSR Bypass for Applications with no change in emissions</li></ul>	<ul style="list-style-type: none"><li>Scoping meeting with IM completed</li></ul>
<ul style="list-style-type: none"><li>Title V/Rule 212 Public Notice Tracking</li></ul>	<ul style="list-style-type: none"><li>Title V tracking in development stage</li><li>Pending scoping meeting with IM on Rule 212 tracking</li></ul>

# Permit Streamlining Update - System Enhancements (cont'd)

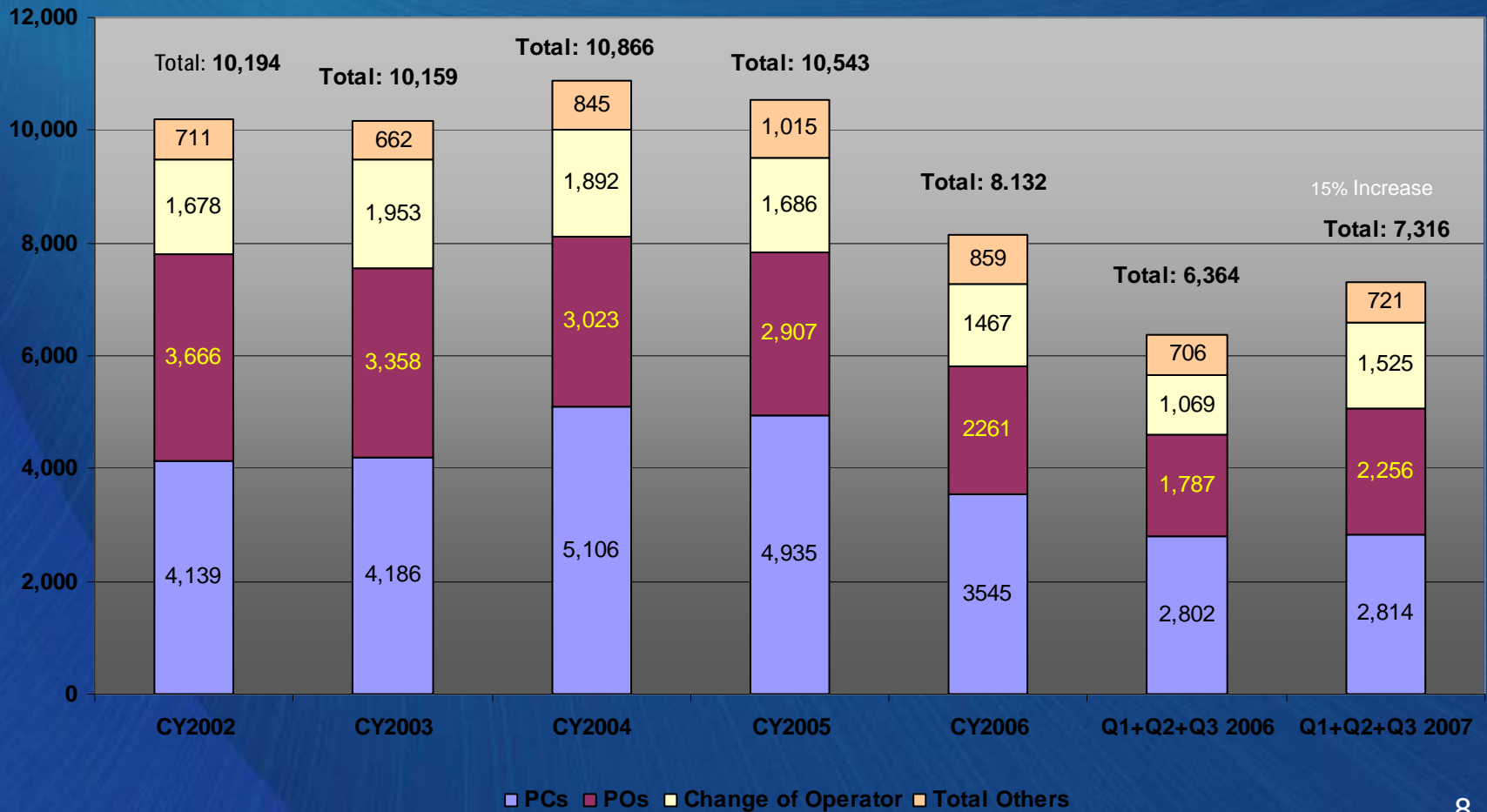
Permit Streamlining Measures	Status
Application Forms Improvements	•Pending release of RFP
Improvements to Permitting Intranet	•Pending release of RFP
Updating Policy and Procedures	•Completed and on-going •Selected ones for public now available on-line and will be searchable by key word or subject
Updating Permit Processing Templates	•List of equipment identified for templates and is now on the web •2 templates have been added and additional ones are being developed.

# Fees for Change of Title for Short Term ERCs (STERCs)

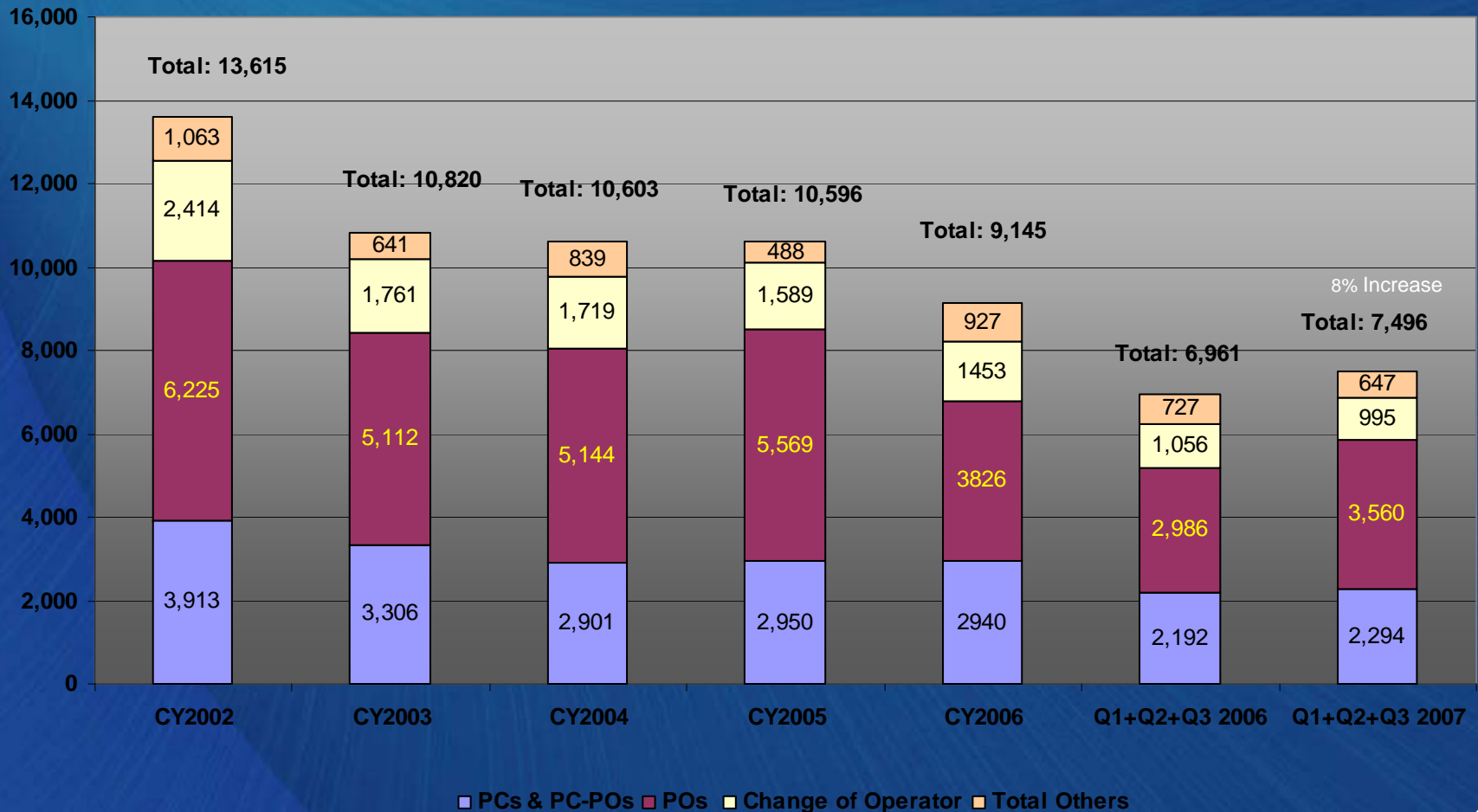
In response to concerns about high fees charged to change Titles on STERCs, the following directions were given to staff:

- Treat multiple applications for Change of Title for the same stream of STERCs as identical applications pursuant to Rules 301(c)(1)(F) & (c)(4)
- Full fees for 1<sup>st</sup> application and 50% fees for each additional Change of Title for subsequent STERCs
- Staff to keep track of time spent on processing the Change of Title for STERCs.
- Propose amendments to Reg. XIII, if justified by time tracking data.

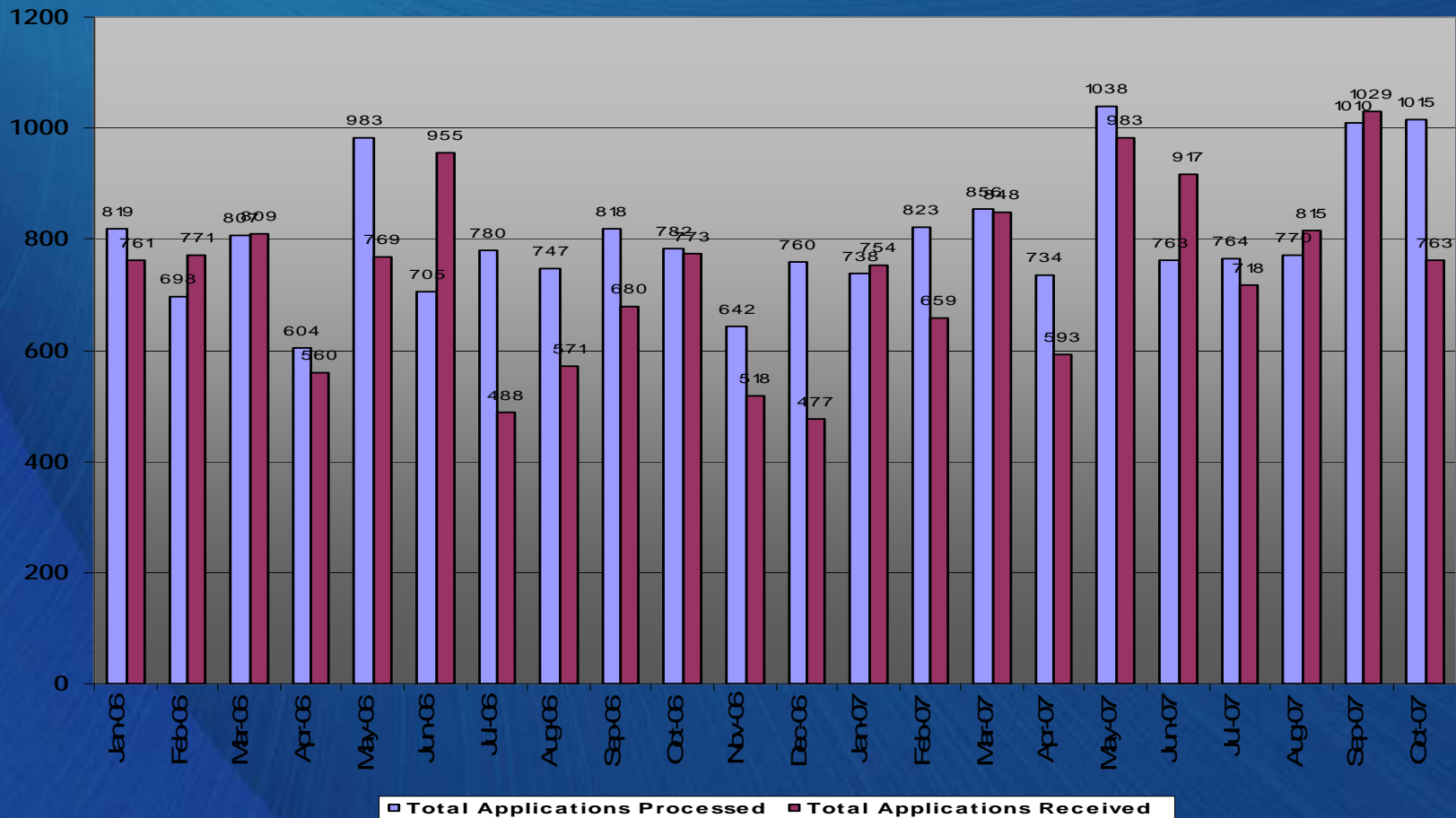
# Permit Inventory Status Update - Applications Received



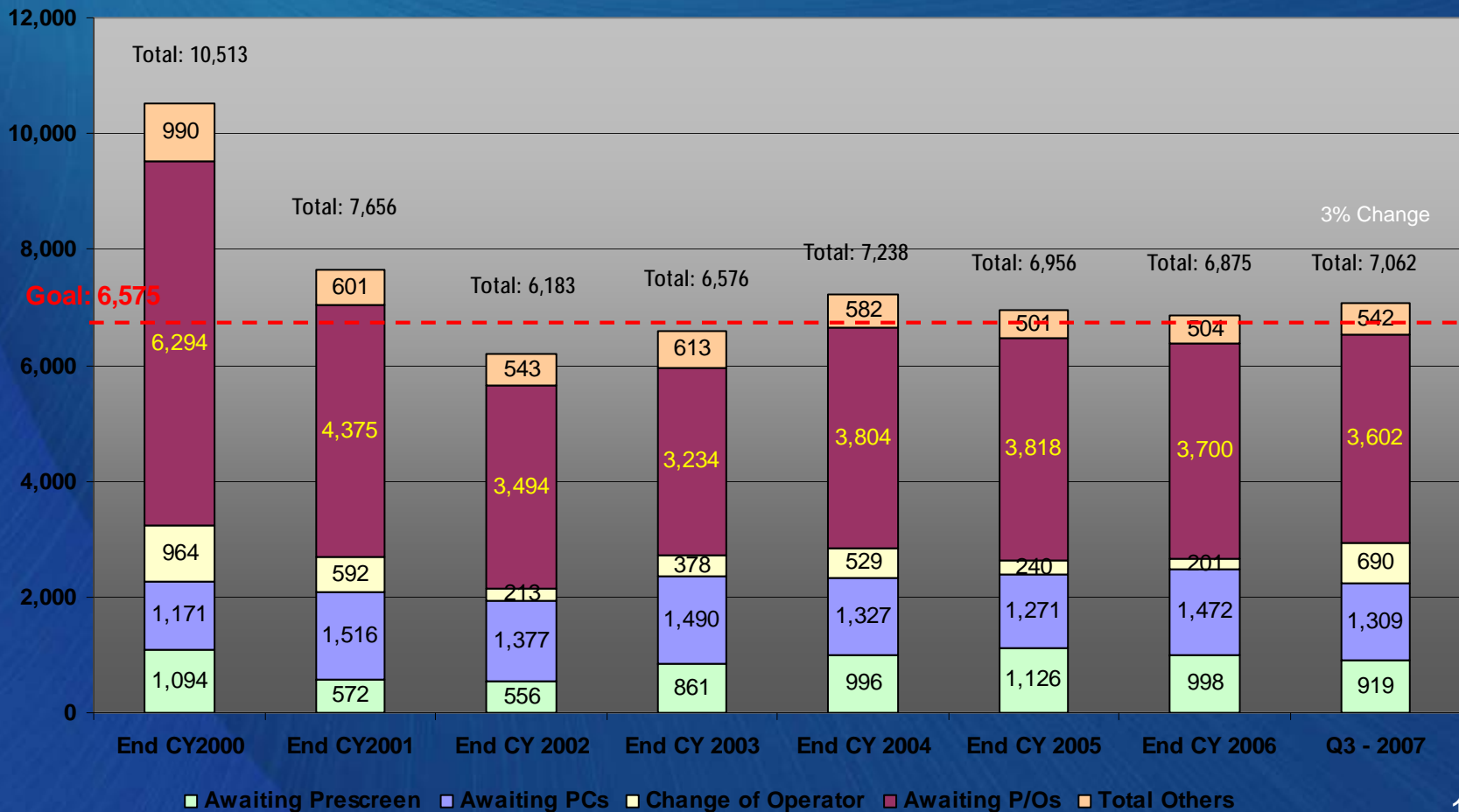
# Permit Inventory Status Update - Applications Processed



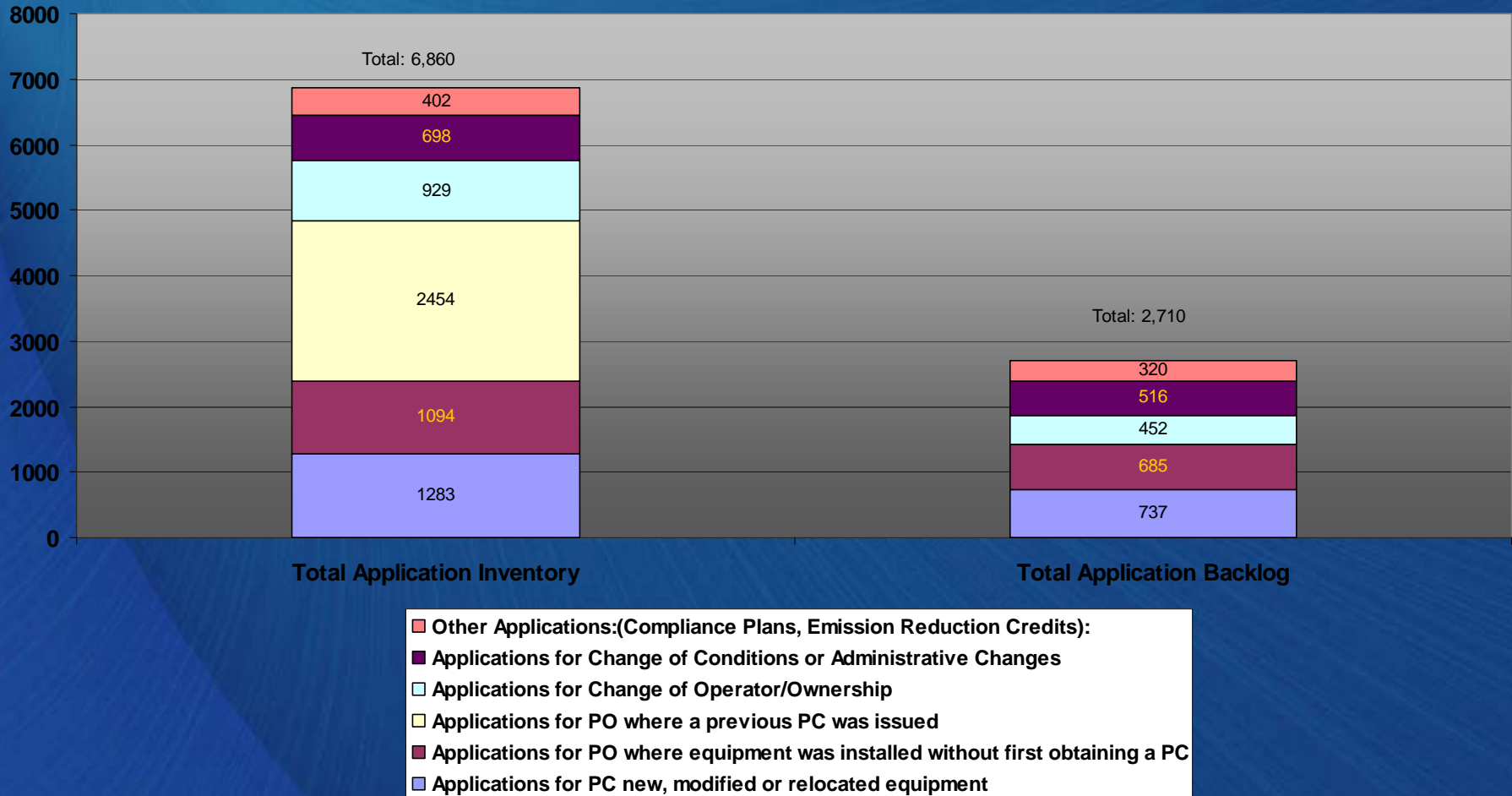
# Permit Inventory Status Update - Applications Processed & Received



# Permit Inventory Status Update - Applications Pending



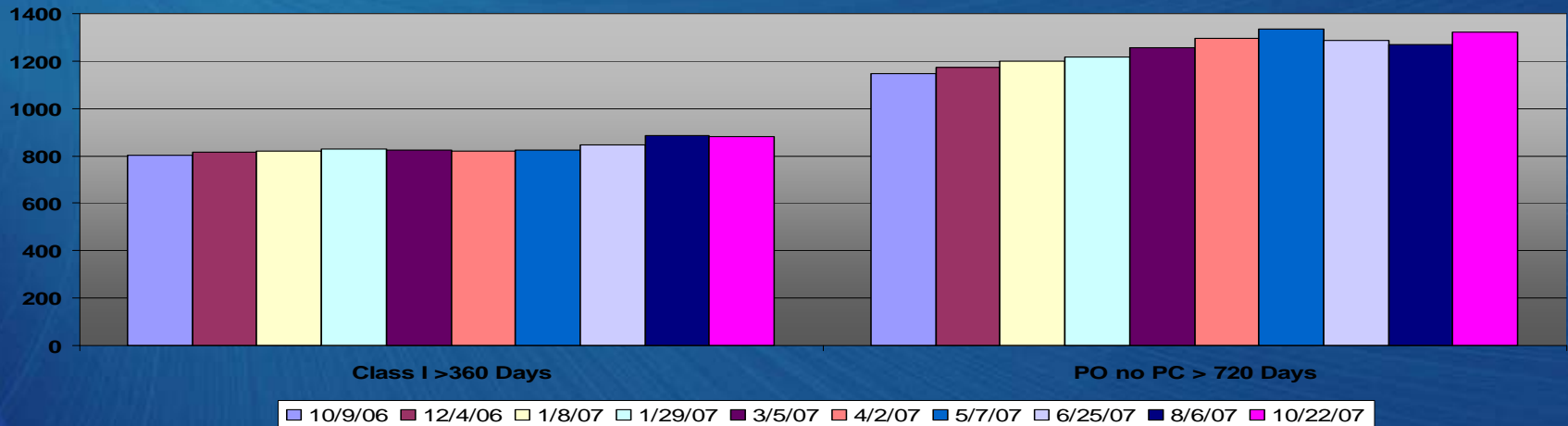
# Permit Inventory Status Update - Backlog New Definition\*



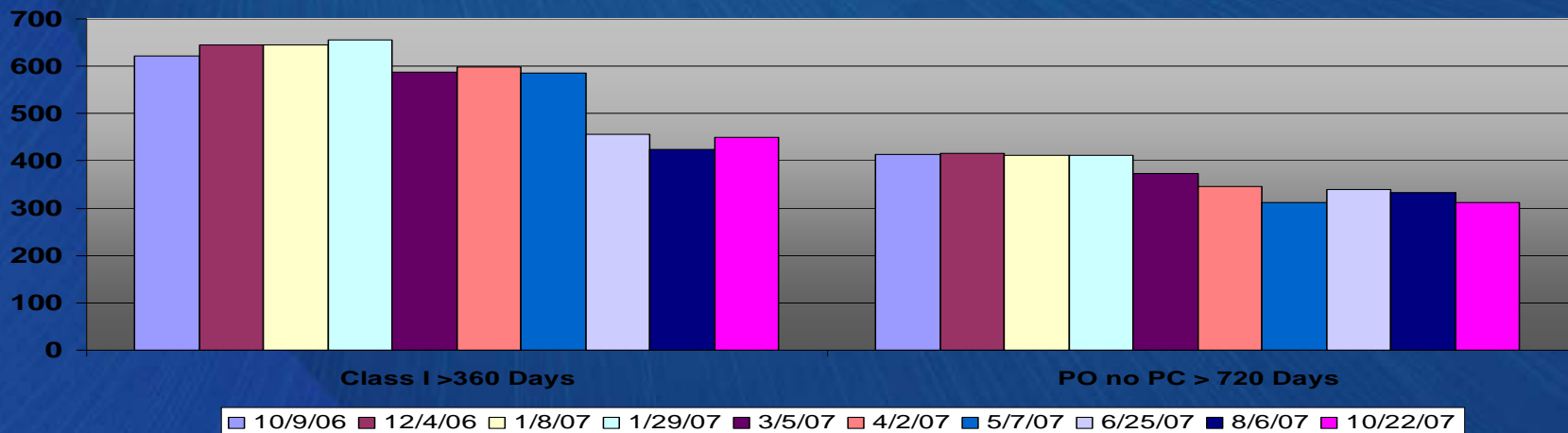
\* As of Oct. 29, 2007

# Permit Inventory Status Update - Aged Application Report

## Average Age (Days) Comparison



## Application Count Comparison



# NESHAP Training

- One of the PSTF recommendations is to conduct training on NESHAP/MACT Standards and open it to the regulated community
- On-going discussions with EPA staff in OAQPS to conduct Refinery NESHAP/NSPS training for permitting and compliance staff
- Training should occur in first quarter of 2008.
- Other training for NESHAPs are being developed – e.g., Secondary Aluminum Melting

# Other Permit Streamlining Issues

NACAA Fall Membership Meeting (October 28-31, 2007 in San Diego)

- Improving and Streamlining the Permit Process
  - EPA's Proposed Flexible Air Permit (FAP) Rule
    - Enables a Title V Source to make changes without requiring additional review or approval from the local permitting authority
    - Proposed elements of the FAP include:
      - Advance Approvals for Minor NSR
      - Alternative Operating Scenarios (AOSs)
      - Approved Replicable Methodologies (ARMs)
      - Green Groups for Major NSR
      - Non-Applicability Limitations (e.g., PALs)
  - Delaware's Value Stream Mapping Air Permit Process
  - SCAQMD's Permit Streamlining Effort

# Next Meetings\*

- February 21, 2008 (Thursday)
- May 15, 2008 (Thursday)
- August 14, 2008 (Thursday)
- November 13, 2008 (Thursday)

\* Dates are tentative