

SCAQMD Permitting Walkthrough

Wednesday

March 2, 2005

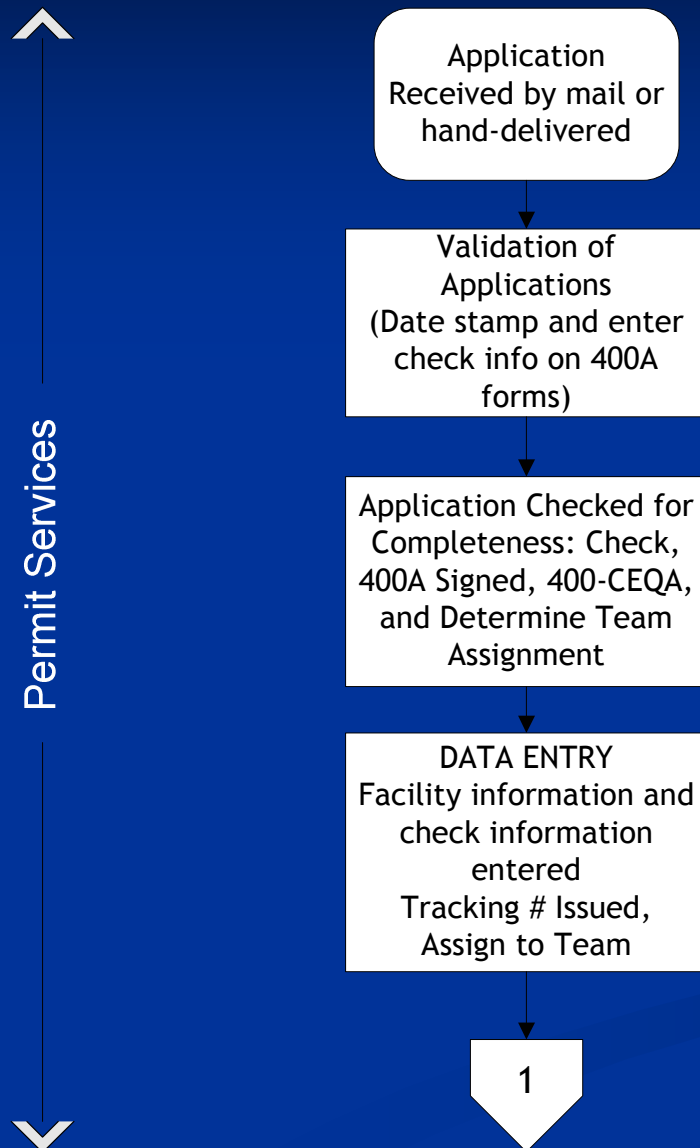
9:00 a.m. -12:00 p.m.

Conference Room CC-8

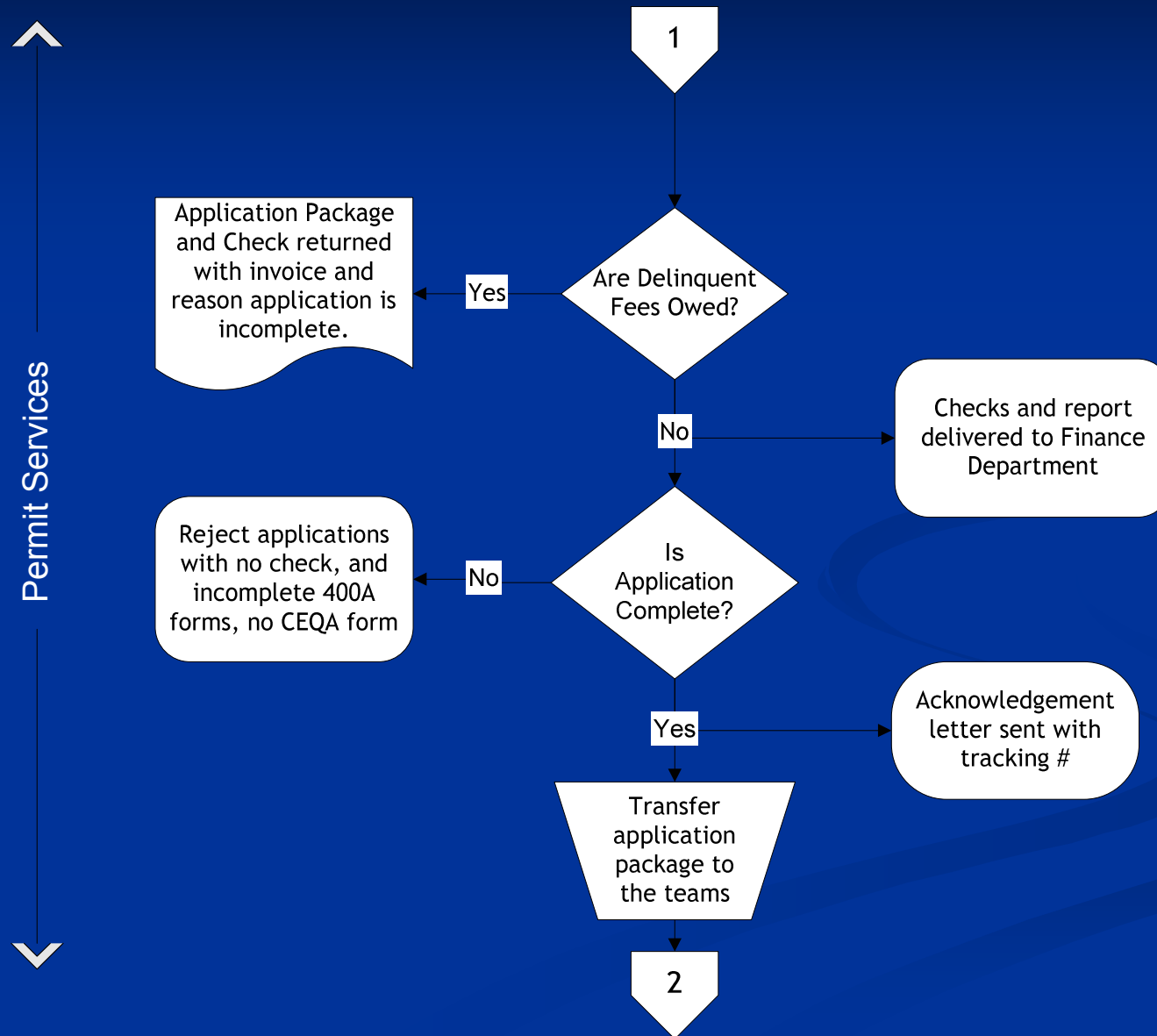
DRAFT PERMIT PROCESS OVERVIEW

- Permit Process Workflow
- Permit Services/Finance
 - Application Receiving
 - Data Entry
 - Interaction with Finance on Fees
 - Application Assignment to Permitting Teams
- Permitting Teams
 - Application Assignment to Engineers
 - Pre-screening
 - Permit Evaluation Process
 - Supervisory/Management Review
 - Public Notice & Public/EPA Review & Comments
 - Final Permit Action
- Information Management
 - Systems Development / Maintenance (Finance, Permitting, NSR, etc.)
 - Permit Records

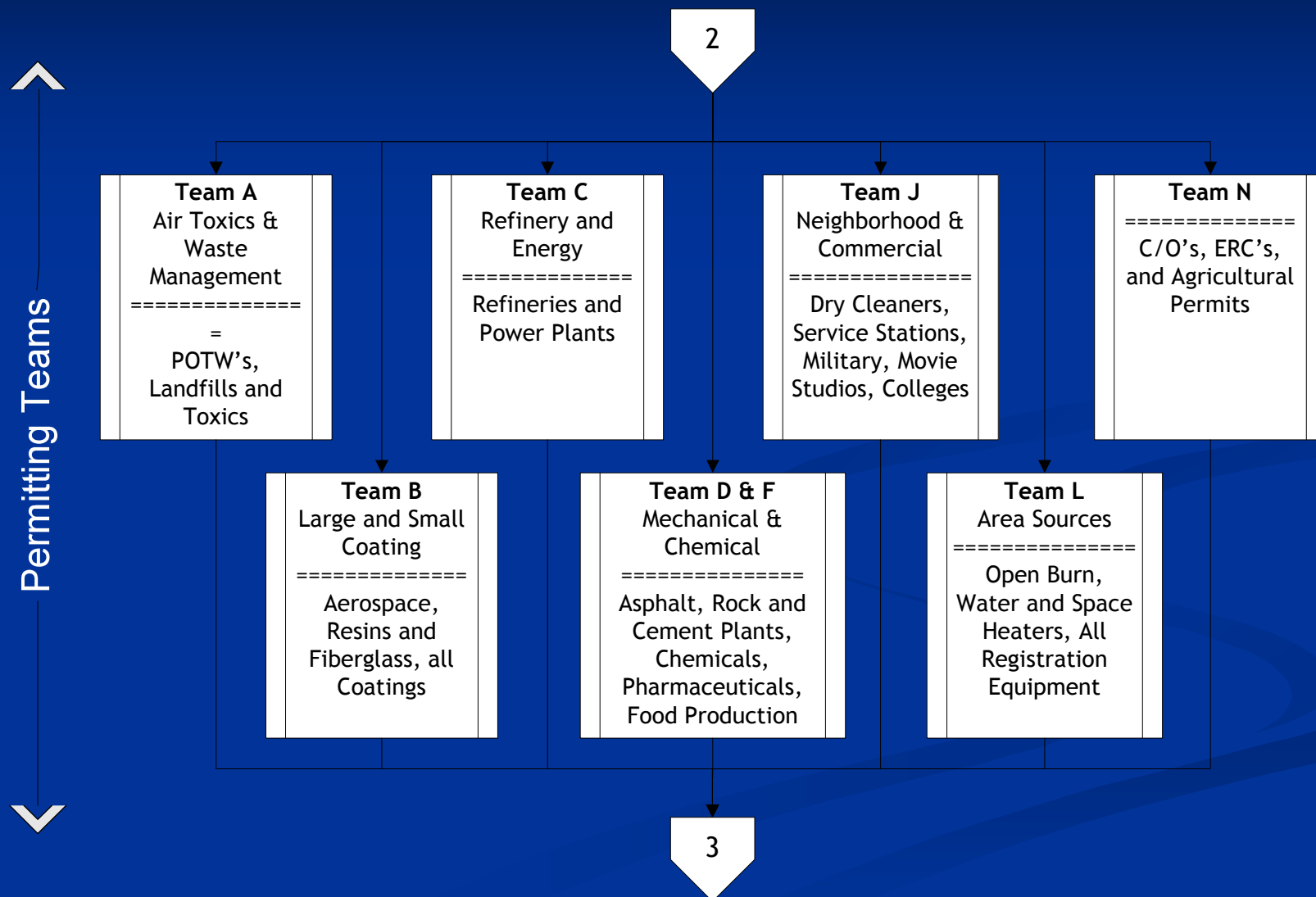
Permit Application Workflow



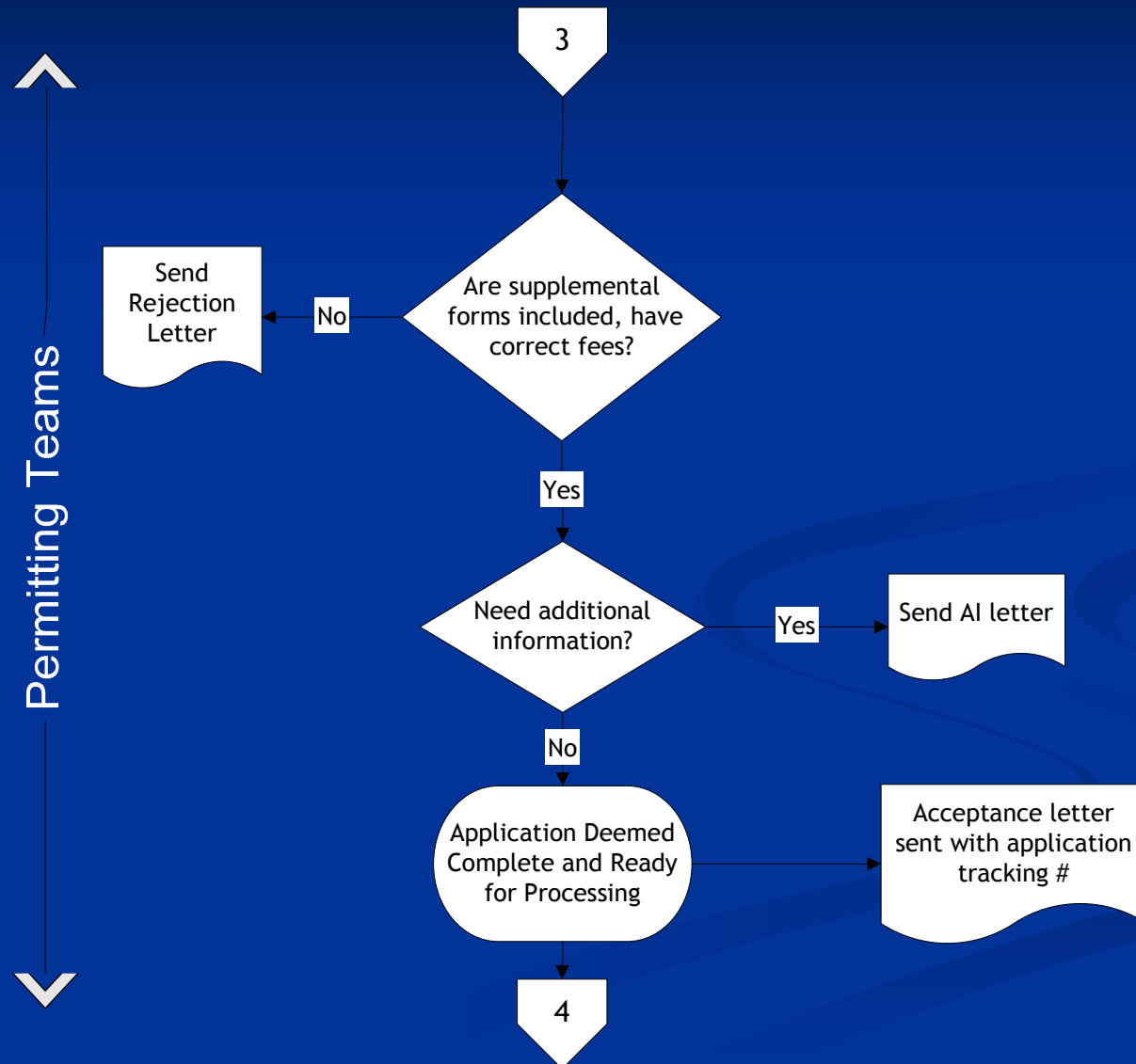
Permit Application Workflow



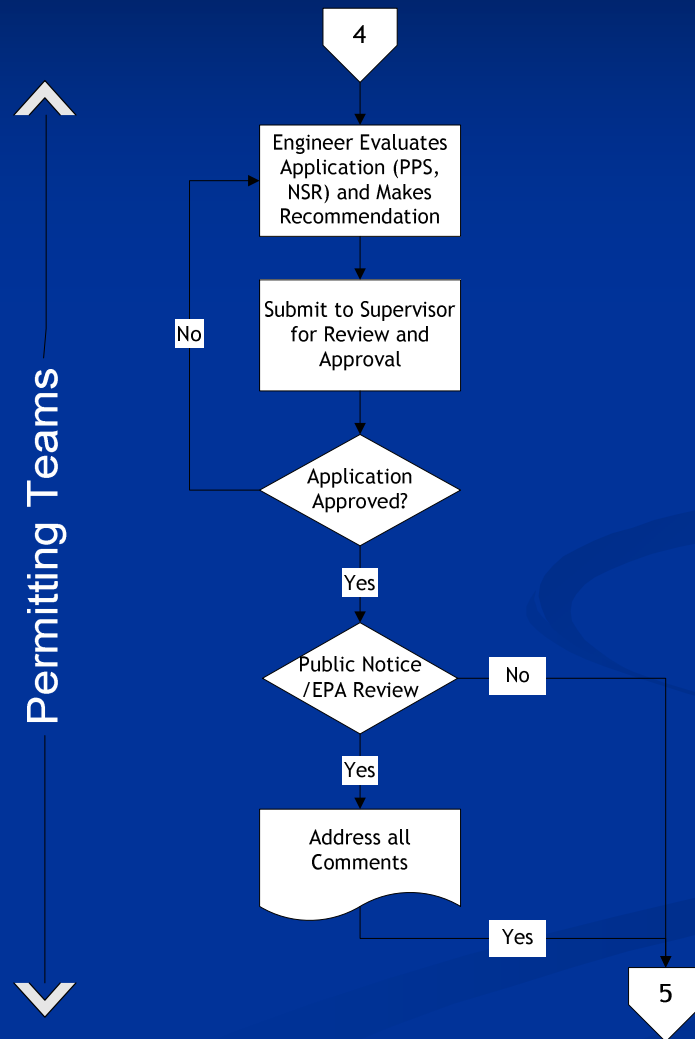
Permit Application Workflow



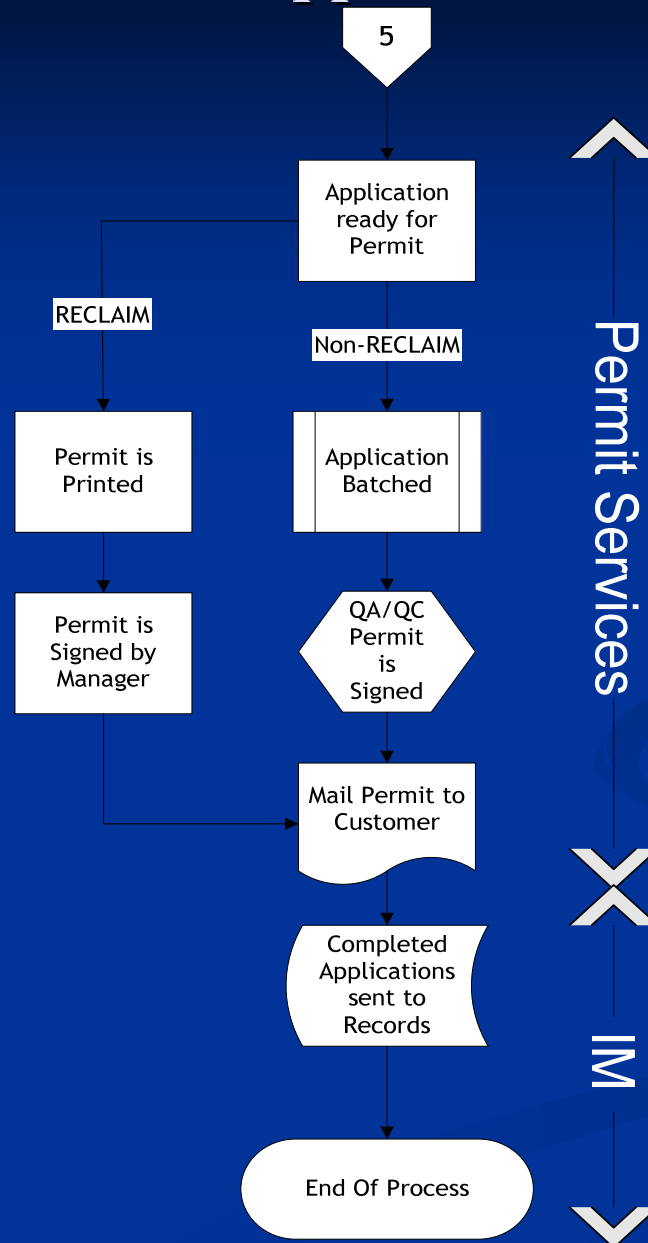
Permit Application Workflow



Permit Application Workflow



Permit Application Workflow



Permit Processing/Evaluation

- Pre-Screening
- CEQA
- Background/Process Description/ Compliance History
- Emission Calculations/Design Evaluations
- NSR/PSD (Reg. XIII, Rule 2005, Reg. XVII or 40CFR52)
- Toxic Rules (Reg. XIV, ATCM, NESHAP/MACT, etc)
- Other Federal Regulations (NSPS, etc)
- Other Rules and Regulations (Reg. IV, XI, XX, XXX, etc.)
- Public Notice (Rule 212)

Pre-Screening

- What is the application filed for? New construction, Modification, Change of Condition, Permit to Operate without prior Permit to Construct, Administrative Change, etc.
- Is the supplemental form (Form 400-E-xx) or information attached?
- Are the CEQA forms attached? Does this require review by the CEQA team?
- How many permit units?
- Is the equipment or process properly identified in Form 400A or supplemental form to pick the appropriate Equipment Category Codes (Basic or Control Category) for determining the fees?
- Is the processing fee the correct amount? (Is this an identical equipment? Operating without prior permit or a small business?)
- Is this a request for Expedited permit processing? Is the Form XPP attached?
- What is the estimated date of construction and completion date?
- Is there enough information to deem the application complete?

CEQA Analysis

- Form 400-CEQA Screening Tool
- If project is exempt – No CEQA
- If not Exempt – Refer to CEQA Staff
- Lead Agency Determination
- CEQA Document Preparation & Certification

New Source Review (NSR)/Prevention of Significant Deterioration (PSD)

NSR Elements

- Best Available Control Technology (BACT/LAER)
- Emission Offsets
- Air Quality Modeling –Screening/Detailed
- Statewide Compliance
- ERC Analysis
- PSD Review by EPA
 - SCAQMD's PSD Delegation terminated March 2003

Toxic Analysis

- NSR for toxic air contaminants – Rule 1401
- Identify toxic air contaminants (TACs) emitted from process
- Calculate TACs' emissions – emission factor or other data
- Screening or Detailed Health Risk Assessment
- Review by Modeling/Risk Assessment Group in Planning and Rules?
- Other Applicable Toxic Rules (Reg. XIV)
- Applicable State Air Toxics Control Measure (ATCM) or a National Emission Standard for Hazardous Air Pollutants (NESHAP) or Maximum Achievable Control Technology.

Other Rules and Regulations

- Fee Rule (Reg. III)
- Prohibitory Rules (Reg. IV))
- Source Specific Rules (Reg. XI)
- RECLAIM (Reg. XX)
- Title V (Reg. XXX)
- Public Notices (Rule 212)

Public Notice {Rule 212, Rule 1310 (c) and Rule 1309.2 (d)}

Public Notice and 30 days Public Comment period is required if:

- The permit unit is within 1,000 feet of the outer boundary of a school and there is an increase in emissions.
- The criteria pollutant emission levels exceed the threshold levels in Rule 212 (g).
- The risk level is greater than 1 in a million with more than one permitted unit or 10 in a million with a single permit unit.
- The Emission Reduction Credits generated above the thresholds levels in Rule 1310 (c)
- Issuing or granting the use of Short Term Credits (STCs) or allocations from the Offset Budget
- Initial, Significant Revision or Renewal of Title V permits (Also requires 45 days EPA Review)
- Minor revision to Title V permits (No Public notice and Public Comments, but 45 days EPA Review)

Permit Programs

- Permit Processing System (PPS) – Non-RECLAIM Facilities (Both Non-Title V and Title V)
- Facility Permit Program (FP) –RECLAIM Facilities (Both Non-Title V and Title V)

What Happens to the Permit?

- Original copy is mailed to permit applicant
- A copy is kept in the application folder.
- Compliance Division is given a copy.
- Application folders with final permit actions (i.e., Permit to Operate, Denied, Cancelled) goes to the Records Room.
- The paper copies are scanned into AQMD Image Server (Liberty System) for easy retrieval.
- The image files are accessible to all AQMD staff for viewing and printing.