

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Preliminary Draft Staff Report

Proposed Amended Rule 110 – Rule Adoption Procedures to Assure Protection and Enhancement of the Environment

Proposed Amended Rule 212 – Standards for Approving Permits and Issuing Public Notice

Proposed Amended Rule 301 – Permitting and Associated Fees

Proposed Amended Rule 303 – Hearing Board Fees

Proposed Amended Rule 306 – Plan Fees

Proposed Amended Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory

Proposed Amended Rule 309 – Fees for Regulation XVI and Regulation XXV

Proposed Amended Rule 315 – Fees for Training Classes and License Renewal

Proposed Amended Rule 510 – Notice of Hearing

Proposed Amended Rule 515 – Findings and Decision

Proposed Amended Rule 812 – Notice of Hearing

Proposed Amended Rule 3006 – Public Participation

November 2018

Deputy Executive Officer

Planning, Rule Development, and Area Sources
Philip M. Fine, Ph.D.

Assistant Deputy Executive Officer

Planning, Rule Development, and Area Sources
Susan Nakamura

Planning and Rules Manager

Planning, Rule Development, and Area Sources
Michael Morris

Authors: James McCreary – Assistant Air Quality Specialist

Contributors: Barbara Baird – Chief Deputy Counsel
Amir Dejbakhsh – Assistant Deputy Executive Officer
Robert Gottschalk – Air Quality Specialist
Mark Henninger – Technology Implementation Manager
Elaine-Joy Hills – Air Quality Inspector II
Saad Karam – Systems & Programming Supervisor
Kevin McDaniel – Mail/Subscription Services Supervisor
David Ono – Program Supervisor
Barbara Radelein – Program Supervisor
Tracy Tang – Air Quality Engineer II

Reviewed By: Brian Tomasovic – Senior Deputy District Counsel
Mary Reichert – Senior Deputy District Counsel

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD**

Chairman: DR. WILLIAM A. BURKE
Speaker of the Assembly Appointee

Vice Chairman: DR. CLARK E. PARKER, SR.
Senate Rules Committee Appointee

MEMBERS:

BEN BENOIT
Mayor, Wildomar
Cities of Riverside County

JOE BUSCAINO
Council Member, 15th District
City of Los Angeles Representative

MICHAEL A. CACCIOTTI
Council Member, South Pasadena
Cities of Los Angeles County/Eastern Region

JOSEPH K. LYOU, Ph.D.
Governor's Appointee

LARRY MCCALLON
Mayor, Highland
Cities of San Bernardino County

JUDITH MITCHELL
Mayor Pro Tem, Rolling Hills Estates
Cities of Los Angeles County/Western Region

SHAWN NELSON
Supervisor, Fourth District
County of Orange

V. MANUEL PEREZ
Supervisor, Fourth District
County of Riverside

DWIGHT ROBINSON
Council Member, Lake Forest
Cities of Orange County

JANICE RUTHERFORD
Supervisor, Second District
County of San Bernardino

HILDA L. SOLIS
Supervisor, First District
County of Los Angeles

EXECUTIVE OFFICER:

WAYNE NASTRI

TABLE OF CONTENTS

TABLE OF CONTENTS	TOC-1
CHAPTER 1: BACKGROUND	1-1
INTRODUCTION	1-1
REGULATORY BACKGROUND	1-2
AFFECTED INDUSTRIES	1-2
PUBLIC PROCESS	1-3
CHAPTER 2: SUMMARY OF PROPOSAL	2-1
INTRODUCTION	2-1
PROPOSED RULE AMENDMENTS	2-1
PROPOSED IMPLEMENTATION	2-3
CHAPTER 3: IMPACT ASSESSMENT	3-1
INTRODUCTION	3-1
RULE ADOPTION RELATIVE TO COST EFFECTIVENESS.....	3-1
COMPLIANCE COSTS	3-1
SOCIOECONOMIC ASSESSMENT.....	3-1
CALIFORNIA ENVIRONMENTAL QUALITY ACT ANALYSIS	3-1
DRAFT FINDINGS UNDER CALIFORNIA HEALTH AND SAFETY CODE SECTION 40727.....	3-1
APPENDIX 1: INTERIM PROCEDURES FOR REQUESTING DELIVERY OF PUBLIC NOTICES	A1-1

CHAPTER 1: BACKGROUND

INTRODUCTION

REGULATORY BACKGROUND

AFFECTED INDUSTRIES

PUBLIC PROCESS

INTRODUCTION

In June 2018, Senate Bill (SB) 1502¹ was approved, authorizing air districts to send any public notice where mailing is required pursuant to Division 26 (Air Resources) of the California Health and Safety Code by electronic mail (email). Under SB 1502, air districts are required to send notices by mail to any person who has requested the notice to be sent by mail and to adopt procedures for the public to request public notices to be sent by mail and procedures for the public to update their email address. These required procedures must be adopted (and updated as needed) by the air districts' Governing Board. The requirements of SB 1502 are now codified in California Health and Safety Code Section 40006. Several South Coast Air Quality Management District (SCAQMD) rules are proposed for amendment in response to SB 1502 to reflect the change in state law for distribution of public notices. Several other SCAQMD rules that reference mailing, even when not required by the California Health and Safety Code, are also proposed for amendment for the same purpose.

The U.S. EPA also revised its permit processing requirements across all Clean Air Act permit programs, including New Source Review (NSR) and Title V, to remove the mandatory requirement for public notice of a draft air permit through publication in a newspaper.² The federal rule changes in the Code of Federal Regulations allow (and for federal permitting, require) permitting authorities to provide electronic noticing (e-notice) of permitting actions and that, should e-notice be adopted, such permitting actions be electronically accessible (e-access). California Air Resources Board (CARB) Advisory 299 (June 2018)³ explains that air districts can implement their own rules consistent with these federal rule changes and that such changes do not violate the Protect California Air Act of 2003. As a result, proposed amendments to Rule 212(g) and 3006 will provide a noticing method for e-notice, consistent with EPA's modernized public notice requirements. Both EPA and CARB have identified the value of e-noticing to enhance public participation and result in a better informed public. As noted by CARB Advisory 299, newspaper notices may continue to be required under other provisions of the Health and Safety Code and other law, such as the California Environmental Quality Act (CEQA), but this advisory is not pertinent to permit issuances in the implementation of Rule 212(g) and Rule 3006 requirements. Any permitting action that would necessitate a Draft Environmental Impact Report (EIR) under CEQA may separately be subject newspaper notice requirements for that EIR, and SCAQMD practices to meet that requirement will not be changed. CARB Advisory 299 also recommends a dedicated web page for listing all public notices related to NSR permitting, so that all posted notices contain certain minimum information requirements.

The SCAQMD is extending this public notice and e-notice communication modernization effort into amending its Regulation III (Fees) rules as well. These amendments will enable SCAQMD and facilities to electronically issue and pay invoices, respectively.

These amendments will allow for more effective and efficient communication between SCAQMD and the facilities and public.

¹ California Senate Bill 1502: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=20170180SB1502

² Revisions to Public Notice Provisions in Clean Air Act Permitting Programs, 81 Fed. Reg. 71613 (Oct. 18, 2016). <https://www.gpo.gov/fdsys/pkg/FR-2016-10-18/pdf/2016-24911.pdf>

³ California Air Resources Board Advisory 299: <https://www.arb.ca.gov/enf/advs/advs299.pdf>

- The rules proposed for amendment include: 110 – Rule Adoption Procedures to Assure Protection and Enhancement of the Environment
- 212 – Standards for Approving Permits and Issuing Public Notice
- 301 – Permitting and Associated Fees
- 303 – Hearing Board Fees
- 306 – Plan Fees
- 307.1 – Alternative Fees for Air Toxics Emissions Inventory
- 309 – Fees for Regulation XVI and Regulation XXV
- 315 – Fees for Training Classes and License Renewal
- 510 – Notice of Hearing
- 515 – Findings and Decision
- 812 – Notice of Hearing
- 3006 – Public Participation

REGULATORY BACKGROUND

Given the additional flexibility afforded by SB 1502, SCAQMD staff identified multiple rules, including Rules 212 and 3006, that would benefit from updated amendments, as many rules refer to mailing separate from the Health and Safety Code requirements. Such rules are eligible for amendment even without SB 1502 directive.

Three rule amendment categories are proposed:

1. Public Notifications for New Source Review and Title V Permit Programs

EPA 81 FR 71613 enables the SCAQMD to amend its rules requiring newspaper publications of new source review and Title V permits and rule development notices. Rules 212 and 3006 are proposed for amendment to allow the SCAQMD to post such communications on a public webpage and allow public access to this webpage.

2. Public Notifications for Rulemaking Activities

Senate Bill 1502 enables the SCAQMD to amend its rules requiring that public notices be sent only by mail. Rules 110, 212, 510, 515, and 812 are proposed for amendment to allow the SCAQMD to also send public notices by email, and only by mail should a person opt-in to receive notices by mail only.

3. Public Notices for Hearing Board Cases and Invoices to Permit Holders

Rules 301, 303, 306, 307.1, 309, and 315 are proposed for amendment to allow the SCAQMD to email fee invoices to permit holders and allow permit holders to pay these invoices electronically.

AFFECTED INDUSTRIES

The proposed amendments are for permit actions, Title V sources, and fee invoices, therefore these amendments affect every industry within the SCAQMD's jurisdiction. However, as stated, facilities can opt-in to continue to receive communications from the SCAQMD by mail.

PUBLIC PROCESS

The Public Workshop is scheduled to be held at the SCAQMD Headquarters in Diamond Bar on November 29, 2018. The proposed rule amendments are administrative changes, and were deemed to not have a material impact on subject businesses, given the retention of the right to remain on a mailing list on request for rules made eligible for amendment by SB 1502. A Public Hearing will be held, during which the public may provide input on the proposed amendments. The Public Hearing is scheduled to be held at the SCAQMD Headquarters in Diamond Bar on March 1, 2019.

CHAPTER 2: SUMMARY OF PROPOSAL

INTRODUCTION

PROPOSED RULE AMENDMENTS

PROPOSED IMPLEMENTATION

INTRODUCTION

The purpose of the proposed amendments is to allow for the option to send public notices by email, e-noticing of permit actions, and email fee invoices. All uses of the words “electronic mail” in the rule amendments are synonymous with “email”. Two rules that pertain to NSR and Title V permitting are also proposed for amendment to align with newly amended federal rules to adopt e-noticing as a consistent noticing method and to only retain notice by newspaper publication as a supplemental noticing method.

The SCAQMD proposes to incorporate the option of electronic notification into several rules to be consistent with the EPA’s 81 FR 71613 and SB 1502. The proposed rule amendments are administrative changes. The SCAQMD will be coordinating with CARB staff in the development of permit rule changes as they apply to e-noticing in lieu of newspapers for the SCAQMD’s permit rules. The SCAQMD has also determined PAR 212 is subject to State Implementation Plan (SIP) submission in the future.

The proposed amendments to Rule 212 and Rule 3006 match current requirements in the Code of Federal Regulations and would therefore be eligible for federal approval into the State Implementation Plan (SIP) or for approval as a Title V program revision if such approvals would be needed in the future. Pursuant to the EPA’s 81 Fed. Reg. 71613 e-access requirements, the SCAQMD is enhancing its sign-up webpage to register email addresses to facilitate the transition from mailed to emailed notices for NSR and Title V permits. Additional details are found in Appendix 1 – Interim Procedures for Requesting Delivery of Public Notices.

PROPOSED RULE AMENDMENTS

Below is a table summarizing the categorical change for each rule:

Amendment Category	Rule Number	Rule Title
Public Notifications for New Source Review and Title V Permit Programs	212	Standards for Approving Permits and Issuing Public Notice
	3006	Public Participation
Public Notifications for Rulemaking Activities	110	Rule Adoption Procedures to Assure Protection and Enhancement of the Environment
	212	Standards for Approving Permits and Issuing Public Notice
	510	Notice of Hearing
	515	Findings and Decision

	812	Notice of Hearing
Public Notices for Hearing Board Cases and Invoices to Permit Holders	301	Permitting and Associated Fees
	303	Hearing Board Fees
	306	Plan Fees
	307.1	Alternative Fees for Air Toxics Emissions Inventory
	309	Fees for Regulation XVI and Regulation XXV
	315	Fees for Training Classes and License Renewal

An example of each type of change is below:

Public Notifications for New Source Review and Title V Permit Programs

Proposed Amended Rule 3006 - Subparagraph (a)(1)(A)

The District shall give notice by publication in a newspaper of general circulation in the county where the source is located, by mail to those who request in writing to be on a list to receive all such notices, and by any other means determined by the Executive Officer to be necessary to assure adequate notice to the affected public. SCAQMD shall give notice by posting notice on the SCAQMD's public website for the duration of the public comment period. In addition, notice shall be given to persons on a mailing or electronic mailing list that has been developed to enable interested parties to subscribe to the mailing list. The Executive Officer may update the mailing list from time to time by requesting written indication of continued interest from those listed and may delete from the list the name of any person who fails to respond to such request within a reasonable timeframe.

Public Notifications for Rulemaking Activities

Proposed Amended Rule 212 - Subdivision (e)

Any person may file a written request for notice of any decision or action pertaining to the issuance of a Permit to Construct. The Executive Officer shall provide ~~mailed~~ notice by mail, electronic mail, or other electronic means, of such decision or action to any person who has filed a written request for notification. Requests for notice shall be filed pursuant to procedures established by the Executive Officer. The notice shall be sent by mail, electronic mail, or other electronic means,~~mailed~~ at the time that the Executive Officer notifies the permit applicant of the decision or action. The period to appeal, as specified in subdivision (b) of Rule 216, shall commence on the third day following mailing or electronic transmission of the notice pursuant to this subdivision. The requirements for public notice pursuant to this subdivision are fulfilled if the Executive Officer makes a good faith effort to follow procedures established pursuant to this subdivision for giving notice and, in such circumstances, failure of any person to receive the notice shall not affect the validity of any permit subsequently issued by the Executive Officer.

Public Notices for Hearing Board Cases and Invoices to Permit Holders

Proposed Amended Rule 301 - Subparagraph (c)(1)(B)

For fees due upon notification, such notice may be given by personal service ~~or by deposit, postpaid, in the United States~~ or sent by mail, electronic mail, or other electronic means, and shall be due thirty (30) days from the date of personal service, ~~or mailing, or electronic transmission~~. For the purpose of this subparagraph, the fee payment will be considered to be received by the ~~District~~ SCAQMD if it is delivered, electronically paid, or postmarked by the United States Postal Service on or before the expiration date stated on the billing notice. If the expiration date falls on a Saturday, Sunday, or a state holiday, the fee payment may be delivered, electronically paid, or postmarked, on the next business day following the Saturday, Sunday, or the state holiday with the same effect as if it had been delivered, electronically paid, or postmarked on the expiration date.

PROPOSED IMPLEMENTATION

As previously discussed, the intent of these administrative amendments is to allow for the option to send public notices by email and to send fee invoices by email when possible. It is also the intent that after a certain date, public notices sent by email become the default method of providing notice, except as indicated by a facility or interested party of the preference for a notice to be delivered by regular mail.

SB 1502 requires the SCAQMD Governing Board to adopt and update procedures in two situations where public notices are sent by electronic mail. The procedures must identify how a person may:

1. Request public notices to be sent by mail; and
2. Update an electronic mail address.

These procedures are discussed in Appendix 1 – Interim Procedures for Requesting Delivery of Public Notices. In addition, Appendix 1 discusses additional procedures regarding how permitted

facilities and interested parties may receive other types of notices and fee invoices regularly sent by SCAQMD.

CHAPTER 3: IMPACT ASSESSMENT

INTRODUCTION

RULE ADOPTION RELATIVE TO COST-EFFECTIVENESS

COMPLIANCE COSTS

SOCIOECONOMIC ASSESSMENT

CALIFORNIA ENVIRONMENTAL QUALITY ACT ANALYSIS

**DRAFT FINDINGS UNDER CALIFORNIA HEALTH AND SAFETY CODE
SECTION 40727**

INTRODUCTION

The proposed amendments allow for the option to send public notices by email, e-noticing of permit actions, and emailing of fee invoices. All uses of the words “electronic mail” in the rule amendments are synonymous with “email”.

RULE ADOPTION RELATIVE TO COST EFFECTIVENESS

The proposed amendments are administrative and have been determined to have no negative impact on air quality.

COMPLIANCE COSTS

The SCAQMD has determined that no additional costs will be incurred. All elections to remain on a mailing list will be made either on the SCAQMD’s website or existing print material presented to a person, such as a sign-in sheet.

SOCIOECONOMIC ASSESSMENT

The amendments proposed are administrative in nature and will not impose any additional costs to facilities or result in other socioeconomic impacts. The proposed amendments do not significantly affect air quality and emission limitations establish an emission limit or standard, and therefore, no socioeconomic analysis is required under California Health and Safety Code Sections § 40440.8 and § 40728.5.

CALIFORNIA ENVIRONMENTAL QUALITY ACT ANALYSIS

Pursuant to the California Environmental Quality Act (CEQA) and SCAQMD Rule 110, the SCAQMD, as lead agency for the proposed project, has reviewed the proposed amendments to the rules identified above (the proposed project) pursuant to: 1) CEQA Guidelines Section 15002(k) - General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and 2) CEQA Guidelines Section 15061 - Review for Exemption, procedures for determining if a project is exempt from CEQA. SCAQMD staff has determined that it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment. Therefore, the project is considered to be exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Activities Covered by General Rule. A Notice of Exemption will be prepared pursuant to CEQA Guidelines Section 15062 - Notice of Exemption. If the proposed project is approved, the Notice of Exemption will be filed with the county clerks of Los Angeles, Orange, Riverside and San Bernardino counties.

DRAFT FINDINGS UNDER CALIFORNIA HEALTH AND SAFETY CODE SECTION 40727

Requirements to Make Findings

California Health and Safety Code Section 40727 requires that prior to adopting, amending or repealing a rule or regulation, the SCAQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report.

Necessity

PARs 110, 212, 301, 303, 306, 307.1, 309, 315, 510, 515, 812, and 3006 is needed to align SCAQMD's rule language with EPA, CARB, and California Legislature directives and recommendations. These proposed amendments are necessary to allow the SCAQMD to develop a process for transitioning to electronic mail noticing and fee invoicing and to increase the public awareness of permit actions triggered by New Source Review via e-noticing on the SCAQMD website. The proposed amendments also address the need that persons may still desire to receive communications from SCAQMD by mail, which the proposed amendments, in alignment with California Senate Bill 1502, allow for. The adoption of these proposed amendments will allow for more efficient communication between SCAQMD and facilities and interested parties, leading to increased engagement and effectiveness.

Authority

The SCAQMD obtains its authority to adopt, amend, or repeal rules and regulations pursuant to California Health and Safety Code Sections 39002, 39650 et. seq., 40000, 40440, 40441, 40702, 40725 through 40728, 41508, and 41511.

Clarity

PARs 110, 212, 301, 303, 306, 307.1, 309, 315, 510, 515, 812, and 3006 are written or displayed so that their meaning can be easily understood by the persons directly affected by them.

Consistency

PARs 110, 212, 301, 303, 306, 307.1, 309, 315, 510, 515, 812, and 3006 are in harmony with and not in conflict with or contradictory to, existing statutes, court decisions or state or federal regulations.

Non-Duplication

PARs 110, 212, 301, 303, 306, 307.1, 309, 315, 510, 515, 812, and 3006 will not impose the same requirements as any existing state or federal regulations. The proposed amended rules are necessary and proper to execute the powers and duties granted to, and imposed upon, the SCAQMD.

Reference

In amending these rules, the following statutes which the SCAQMD hereby implements, interprets or makes specific are referenced: Health and Safety Code sections 39002, 40001, 40702, 40440(a), 40725 through 40728.5, and 41511.

**APPENDIX 1: INTERIM PROCEDURES FOR REQUESTING DELIVERY
OF PUBLIC NOTICES**

Background

California Senate Bill 1502, adopted on June 28, 2018 requires the SCAQMD Governing Board to adopt and update as needed, procedures in two situations where public notices are sent by electronic mail. The procedures must identify how a person may:

1. Request public notices to be sent by mail; and
2. Update an electronic mail address.

This Guidance Document specifies these two procedures, as well as expanding on additional procedures regarding how permitted facilities and interested parties may receive other types of notices and fee invoices regularly sent by SCAQMD.

Procedures to Comply with SB 1502

SCAQMD will develop a program to collect and manage preferences for public noticing required by SCAQMD rules and regulations from approximately 22,000 permitted facilities as well as from interested parties. In addition, the program will allow for a person to provide and update an electronic mail address. The program will allow SCAQMD to send public notices:

1. Electronically to all facilities required to receive those notices;
2. To all facilities requesting to receive those notices by United States Postal Service (i.e. regular mail);
3. To all interested parties that specify an interest in receiving those notices either by electronic mail or by regular mail.

In addition to delivery of public notices required by SCAQMD rules, the program will also provide the framework for future deliveries of fee invoices and SCAQMD Hearing Board notices.

SCAQMD proposes to establish the process to collect electronic mail addresses for all permit holders and for other interested parties who wish to receive certain public notices through this Guidance Document. The electronic infrastructure to collect and update email addresses needs to be developed. This document will be updated as necessary, depending on the format of the tool developed for collecting and updating email addresses, and selecting noticing preferences.

Notifying Permit Holders of Procedures

To facilitate the transition to email notices, web-based e-noticing, and email invoicing SCAQMD will conduct outreach efforts to permitted facilities and interested parties. To this end, SCAQMD will use the following notification methods:

1. Regular mail delivery of the new procedures to approximately 22,000 permit holders with the 30-day Notice of Public Hearing required for this rulemaking;
2. Notification of the new procedures with future rulemakings during 2019;
3. Inclusion of a web link to the portal explaining the new procedures for permitted facilities and interested parties with fee billing invoices;
4. A web page on the SCAQMD website regarding information on public notice delivery options; and
5. A banner on the SCAQMD website notifying visitors of public notice delivery options.

With regard to delivery of public notices required under rulemakings SCAQMD will make the effort to contact each permit-holder a minimum of three times to obtain an email address, using the methods described above.

Proposed Email Transition Process

SCAQMD will continue to mail public notices via regular US mail for rulemakings as currently done, until a sufficient percentage of email addresses for permitted facilities have been collected. The transition process will consist of a data gathering period, followed by a pilot program to send public notices via email for smaller rulemakings, followed in turn by a pilot program to send public notices via email for larger rulemakings. Beginning in January 2020, staff will begin an ongoing assessment of the percentage of notifications received from permitted facilities. The objective of this transitional process is to obtain a high percentage of notifications from permitted facilities regarding public notice delivery preference (email or US mail) and email addresses prior to the transition to default email delivery taking place.

The anticipated timing for the transition to electronic mail noticing follows:

Rule Adoption to January 2020:	Data gathering of email addresses through the methods described
January 2020:	Begin ongoing assessment of number of email obtained
January 2020 to January 2022:	Pilot programs to send public notices for rulemakings via email for smaller rulemakings followed by similar pilot programs for larger rulemakings
January 2022:	Begin sending public notices for all rulemakings via email unless permitted facility indicates a notice delivery preference of US mail only. If a sufficient number of permit holders provide email addresses, staff can send public notices by email before January 2022

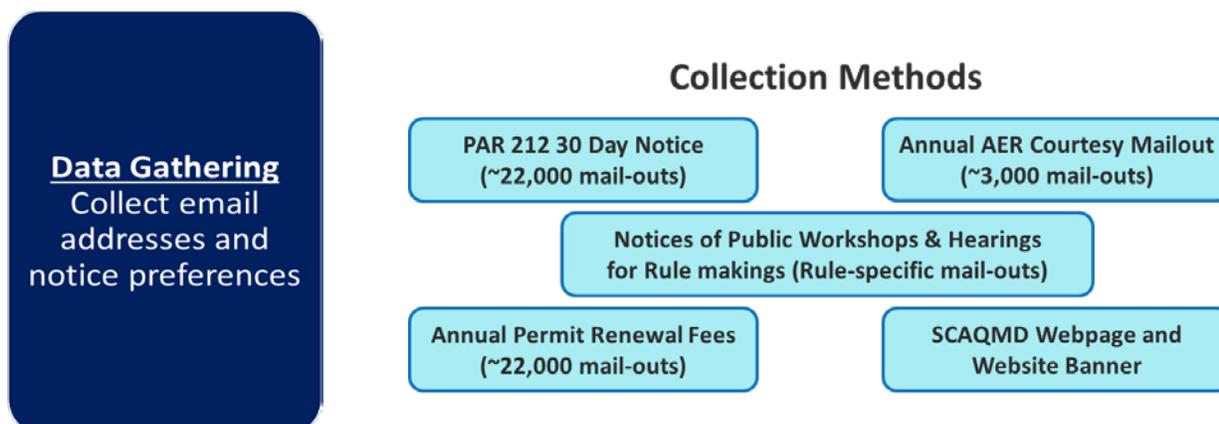
The following figure describes the proposed implementation schedule:



Data Gathering Period

This procedure will take effect upon adoption of Proposed Amended Rule 212 and other rules regarding public notices, e-notices, and fee invoices. Due to the time necessary to develop a robust web-based tool to manage preferences, this procedure allows for an interim approach for

specifying notification preferences until a permanent solution is developed. The following figure illustrates the avenues for outreach during the data gathering effort:



Interim Approach

Until a comprehensive tool is developed to collect and manage notification preferences, an interim approach will allow facilities and interested parties to receive emailed public notices for rulemakings, permit actions (under New Source Review and Title V), and fee invoices, as well as specifying a preference for receiving those notices by mail only. The interim approach uses an existing subscription-based public outreach program (eNewsletter Pro) utilized for notifications of certain rule actions and other information (such as information regarding the Carl Moyer program). The portal for accessing this program is located at <http://aqmd.gov/sign-up>.

This interim approach will be utilized until a more robust and comprehensive tool is developed by SCAQMD at some future date, at which point the data collected in the Interim Solution will be transferred to the new tool.

Current Practice for Managing Email Subscription and Notice Lists

Several SCAQMD divisions currently collect and manage electronic mail subscription and notice lists for various purposes. These divisions send communications via mail, electronic mail, or both, and utilize various means of data collection and storage for mailing addresses, electronic mail addresses, and other similar contact information.

The SCAQMD website includes a link for individuals to sign up for email distribution of notices and other information of specific interest to that person at <http://www.aqmd.gov/sign-up>. Currently, the list of subscriptions for which an individual may enroll includes:

- General Notifications
- Clean Air Plans and CEQA Updates
- Incentive Programs
- Permit Compliance Notifications
- Refinery Flare Emission Notifications
- New Technology

- Rule Updates

SCAQMD offers periodic newsletter updates on these topics. The subscriber is allowed to manage and update their subscriptions including unsubscribing from lists, subscribing to additional lists, or changing their email address. Subscriptions are stored and managed at the SCAQMD through a subscription-based public outreach program (eNewsletter Pro) and information is distributed to subscribers via automated notices, for example Air Alerts for daily pollution forecasts or specific pollution levels in a particular area. In addition, subscribers may receive targeted information on areas for which they indicated an interest.

Proposed Policy for Email Distribution of Public Notices

Staff will continue the current practice of sending public notices by email to relevant addresses collected and managed by SCAQMD staff as described under “Current Practice for Managing Email Subscription and Notice Lists”. Regarding public notices required under individual rules, staff will expand the subscription sign-up page on the SCAMQD website at <http://www.aqmd.gov/sign-up> to include email distribution of public notices. Subscribers may register more than once by using a different email address. Subscribers will be able to indicate a preference to receive emails for public notices subject to Rule 212 – Standards for Approving Permits and Issuing Public Notice, and Rule 3006 – Public Participation. The sign-up page may look similar to the following:

Distribution of Public Notices by Email	
<input type="checkbox"/> Public Notices Required by Rule 212	All permit actions on non-Title V permits subject to public notification
<input type="checkbox"/> Public Notices Required by Rules 212/3006	All permit actions on Title V permits subject to public notification

In addition, the subscription sign-up page will be expanded to allow SCAQMD permit holders to indicate an interest in receiving paperless invoicing for annual permit renewals, and other fees incurred by permit holders. This option will only be available when the framework is in place to allow paperless invoicing. The sign-up page may look similar to the following:

Paperless Invoicing for SCAQMD Permit Holders	
<input type="checkbox"/> Rule 301	Permitting and Associated Fees
<input type="checkbox"/> Rule 303	Hearing Board Fees
<input type="checkbox"/> Rule 306	Plan Fees
<input type="checkbox"/> Rule 307.1	Alternative Fees for Air Toxics Emissions Inventory
<input type="checkbox"/> Rule 309	Fees for Regulation XVI and Regulation XXV
<input type="checkbox"/> Rule 315	Fees for Training Classes and License Renewal

Finally, the SCAQMD subscription sign-up page will be expanded to indicate a preference for mail-only delivery of public notices. This preference would only affect a public notice that the subscriber would ordinarily receive. For example, if a subscriber is located within ¼ mile from a

facility that is subject to a notification under Rule 212 or Rule 3006. Other notifications that the subscriber signs up for would not be affected. The sign-up page may look similar to the following:

Distribution of Public Notices by Mail Only	
<input type="checkbox"/> Public Notices Required by Rule 212	Permit actions on non-Title V permits subject to public notification within ¼ mile of subscriber
<input type="checkbox"/> Public Notices Required by Rules 212/3006	Permit actions on Title V permits subject to public notification within ¼ mile of subscriber