



**PERMIT STREAMLINING
TASK FORCE
SUBCOMMITTEE
MEETING
December 10, 2024**

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**Permit Streamlining Task
Force Subcommittee**

December 10, 2024

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Agenda



Change of
Owner /
Operator
Guidelines



Permitting
Public Notices



Certified
Permitting
Professional
Program



Public
Comment


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Change of Owner / Operator Guidelines

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Comments

Change of Owner/Operator Guidelines

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Permitting Public Notices

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Permitting Public Notices

Overview

- Consolidation of Public Notice function is part of PEP
- Program Start: Launched in April 2024
- Streamlines the Rule 212 Public Notice distribution process
- Provides option for applicants to utilize District staff to distribute their public notices

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Public Notice Streamlining

Process Comparison

Existing Process	New Process
<ul style="list-style-type: none">• Applicant performs public notice distribution<ul style="list-style-type: none">• Applicant must distribute notice or find and secure contractor• Contractor/Applicant contacts schools to generate an address list<ul style="list-style-type: none">• Schools may be reluctant to work with non-governmental company to distribute notice• Applicant notifies permit engineer once distribution is completed<ul style="list-style-type: none">• This step may be overlooked or miscommunicated• Permit engineer reviews and verifies distribution<ul style="list-style-type: none">• Results in additional permitting resource impacts• If deficiencies found, redistribution required<ul style="list-style-type: none">• Resets 30-day comment period	<ul style="list-style-type: none">• Applicant opts to use South Coast AQMD to distribute public notice<ul style="list-style-type: none">• Applicant's primary contact is now District staff• District staff conducts public notice distribution<ul style="list-style-type: none">• Reduces applicant's time and effort• Standardized process• Simplifies school communications<ul style="list-style-type: none">• Reduces potential for delays with school communication• Schools more willing to work with government agency• Simplifies verification procedures<ul style="list-style-type: none">• Eliminates verification of distribution by permitting staff• Reduces risk of re-distribution

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Public Notice Distribution

New Workflow

- Upon applicant request, Special Projects Team contacts the school to initiate distribution to parents of students
 - Internal process allows for immediate hand-off from permitting engineer
- Staff identifies addresses within the surrounding area
- South Coast AQMD Mailroom completes the physical distribution
- Public Comment period begins once distribution is verified
 - **Duration:** 30 days minimum for public input and comments
 - Ensures community involvement and transparency in the permitting process

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Initial Efforts

Results and Feedback

- Public Notices
 - 24 completed notices
 - 8 notices in progress
- Estimated Increased Efficiency
 - Current process: 30 - 120+ days until distribution
 - New Process: 2 - 34 days until distribution (17-day average)
- Initial feedback from both participating facilities and permitting staff is positive

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Key Benefits of the Program

- **Centralized Process**
 - Streamlines the workflow and shortens timelines
 - Distribution and verification steps occur in-house with non-permitting staff
- **Focus Hours on Applications**
 - Allows permit processing engineers to concentrate on their primary work
- **Option for Applicants**
 - Applicants can choose to use South Coast AQMD for public notice completion, easing their workload

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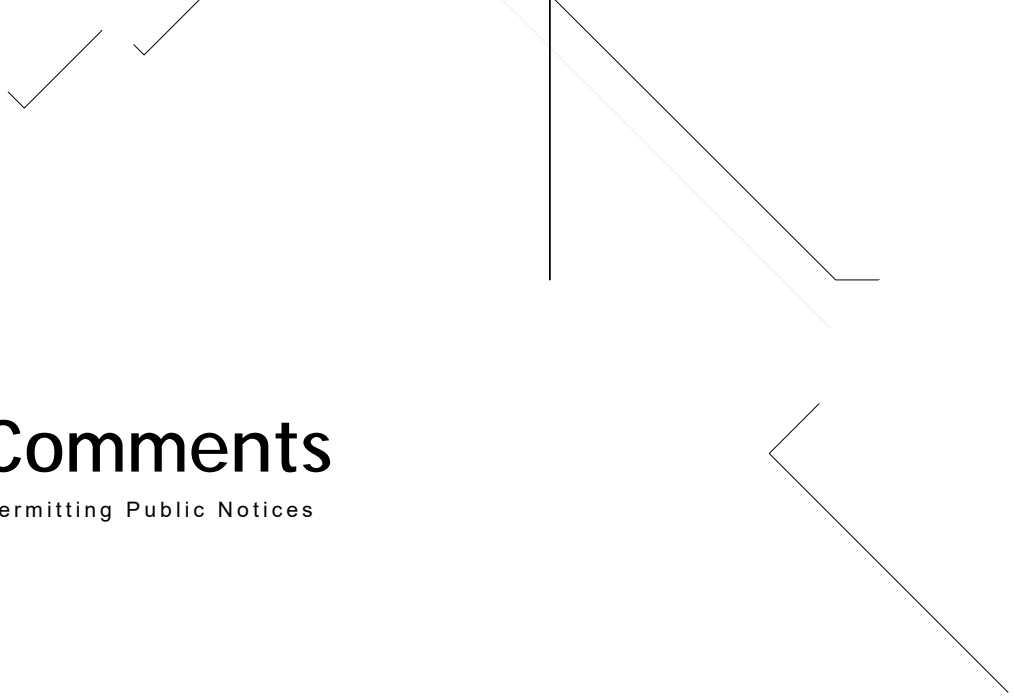
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Next Steps

- **Inclusion of program into Rule 301 language**
 - Current Rule 301 public notice fees do not include postage and materials
- **Expanding to Title V public noticing**
- **Scoping staff capabilities and facility interest**

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Comments
Permitting Public Notices

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**Certified Permitting
Professional Program**

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Certified Permitting Professional Background

- Established by Health and Safety Code (HSC) Section 42300.2
- Current South Coast AQMD implementation
 - CPP examination administered annually
 - Lifetime certification with annual fees
 - Training materials: CPP manual
 - Third party training
 - CPP listing maintained on website
- Currently 120+ active CPPs
 - Approximately 80% consultants

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Certified Permitting Professional CA HSC Sec. 42300.2

- A district may establish a program to certify private environmental professionals to prepare permit applications. The program shall provide for all of the following:
 - a) Certification by the district of private environmental professionals who meet minimum qualifications established by the district and who successfully complete a district or district-approved training program in the methods of preparing permit applications. The training program shall include a description of permit requirements established by the district, as well as any additional requirements established by the district for applications submitted by certified private environmental professionals.
 - b) Expedited review by district personnel of permit applications that, at the option and expense of the permit applicant, are prepared by a certified private environmental professional.
 - c) An audit program, including periodic full district review of permit applications prepared by certified private environmental professionals, to determine whether or not district requirements for the preparation of applications have been followed.
 - d) Decertification of any certified private environmental professional found by the district to have done any of the following:
 - Knowingly or negligently submitted false data as part of a permit application.
 - Prepared any permit application in a manner contrary to district requirements.
 - Prepared a permit application in connection with which the certified private environmental professional has a financial conflict of interest as defined in guidelines which shall be adopted by the district.

(Added by Stats. 1992, Ch. 1126, Sec. 3. Effective January 1, 1993.)

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Certified Permitting Professional

Desired Outcomes

- Pool of qualified resources for regulated community
- Expedited review of permit applications for enhanced submittals
 - Complete application and evaluation
 - Compliance demonstration and compliance assurance
 - Fully referenced data and process descriptions
- Increased utilization of CPPs
 - Increased availability of permitting staff to work on other projects
 - Utilize Permitting Working Group for more meaningful group discussions

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Enhanced CPP Program

Potential Efforts

- Establish and communicate application submittal standards
- Develop initial and ongoing training program
- Revisit certification process
- Program management
 - CPP accountability and tracking

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Potential Enhanced CPP Process

For Discussion

- Facility and/or CPP elects to use CPP option
- Permit application package submittal plus:
 - Complete and accurate evaluation, emission calculations, rule and health risk analyses, draft permits and conditions, recommendations
- Staff prescreening includes preliminary review of all elements of evaluation
- Straight to initial review by Senior Engineer
- Comments sent back to CPP
 - Multiple rounds of errors, revisions may result in off-ramping of permit application
 - Provides for streamlined approach
 - Potential consequences for insufficient or non-compliant applications

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Task Force Discussion

- Training Elements
- Development of Workflows
- Addressing Conflict of Interest provisions
- Permit fee mechanisms
- Program auditing requirements
- Cost recovery and resources for program management

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Comments

Certified Permitting Professional Program

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Other Business

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Tentative PSTF and PWG Meetings

2025

- Mar* - Gov. Board (PEP)
- Mar – PSTF or PWG*
- May – PSTF or PWG*
- June – PSTF or PWG*

* Tentative schedule and/or meeting formats

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Comments

Other Business

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