

Permitting Enhancement Program Work Plan

Board Meeting
August 4, 2023



Permitting Enhancement Program

- April Board meeting, Chair introduced Permitting Enhancement Program (PEP)
- May Board Meeting, staff provided background information and a general outline for PEP Workplan
- Today presenting the Comprehensive PEP Workplan

PEP Workplan Outline

Presented at May Board Meeting



Staffing and Resources



Staff Development and Training



Modernization of Permitting System



Enhance Public Interface and Transparency



Streamlining and Efficiency Improvements

Implementation Timeframe

The following icons are used to provide the estimated implementation timeframe for each action



Action is on going and will continue until it is no longer needed

12m



Completion of action within 12 months

24m



Completion of action between 12 to 24 months

24m+



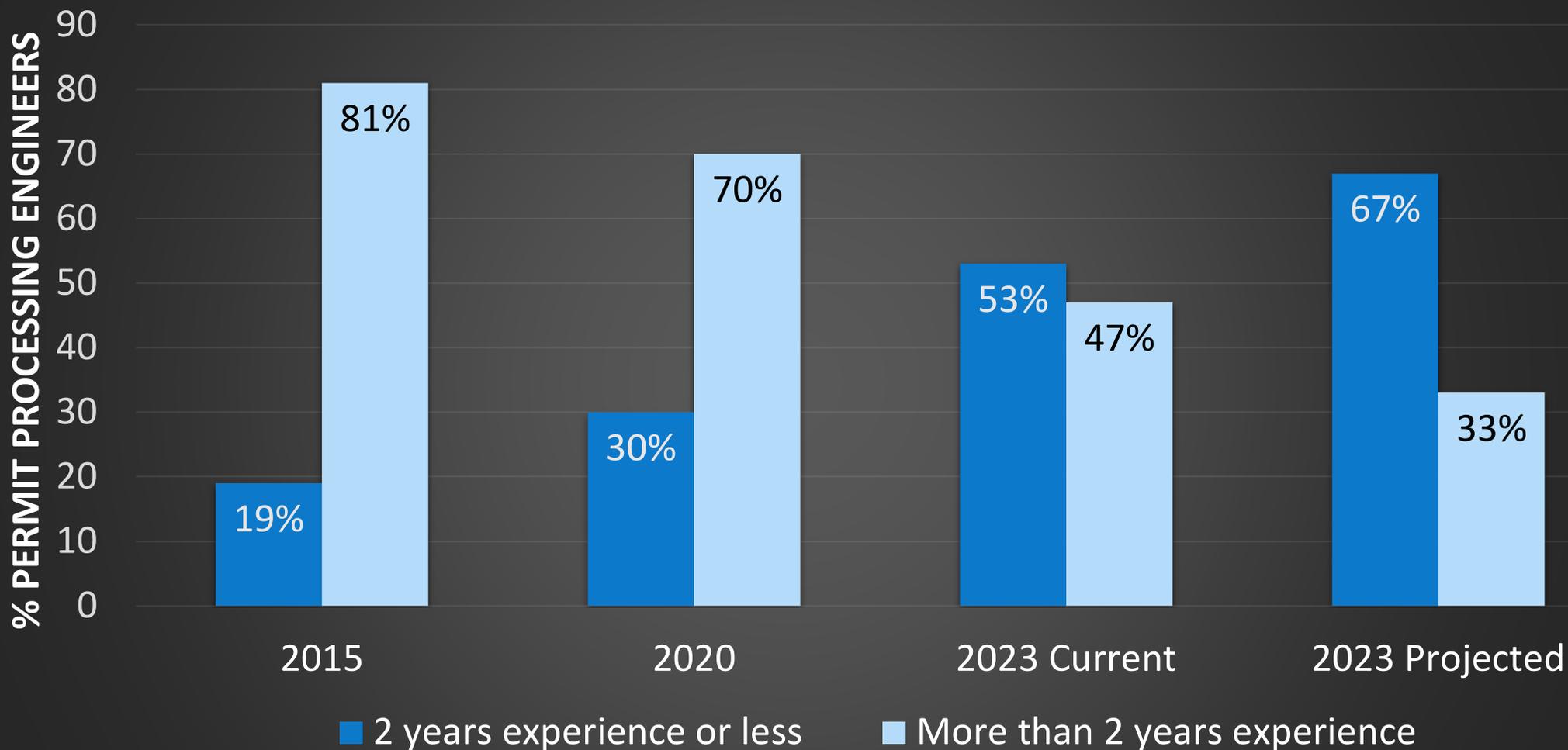
Completion of action between 24 to 36 months (Exception)



Unprecedented
vacancies due to
retirements and
resignations

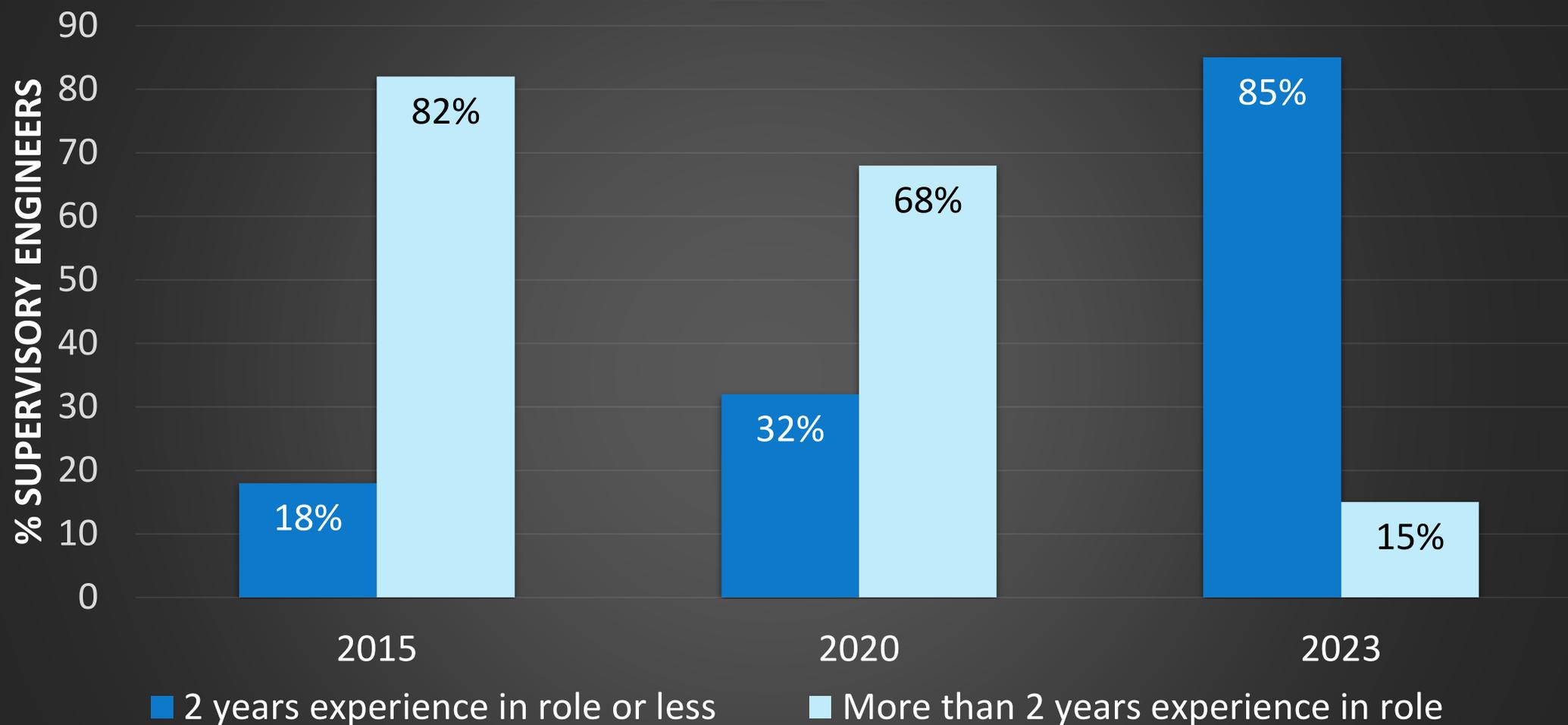


2 out of 3 Processing Engineers Will Have Less Than 2 Years Experience by the End of 2023





Most Supervisory Staff Have Less Than 2 Years in their Current Role





Staffing Actions

-   Achieve and Maintain a Vacancy Rate of 10 percent or Less 
-   Continue Using Retired Employees and Contractors 
-  Continue Implementing Succession Planning for Knowledge Transfer 
-  Redistribution of Resources to Address Bottlenecks 



Having
experienced,
well-trained staff
is critical to
timely permit
processing



Staff Development Actions

12m



Develop and Implement Enhanced Training Programs for all Engineers

IN PROGRESS

24m



Create and Formalize Training Program for Supervisory Engineers

IN PROGRESS

24m



Explore Third Party Technical Training Programs

12m



Continue Developing and Consolidating Standard Operating Procedures (SOP) for Policies

IN PROGRESS



Modernizing permit processing to a paperless online system will increase efficiency and workflow



Modernizing Permit Processing

- Clean Air Support System (CLASS) was primarily developed in the 1990s and is a software system used by all divisions throughout District
- Consists of following software programs directly related to E&P:
 - New Source Review (NSR)
 - Tracks facility emissions
 - Permit Administration and Application Tracking System (PAATS)
 - Application tracking and engineer assignments
 - Permit Processing System (PPS)
 - Permitting fees and permit wording
 - Facility Permit (FP)
 - RECLAIM Facility Permit Administration



Modernization Actions





Efficient Paperless Permit Processing



Online Application Filing

- 18 Forms deployed
- 39 Forms developed
- Will be completed in 2 years



Permit Processing Workflow

- 10 phases
- Phases 1 & 2 in progress; completion by end of 2024
- Phases 3-10: 2+ years to complete



Update & Maintain Permit Processing Software Programs

- Three main permit processing software programs need to be updated
- 2+ years to complete



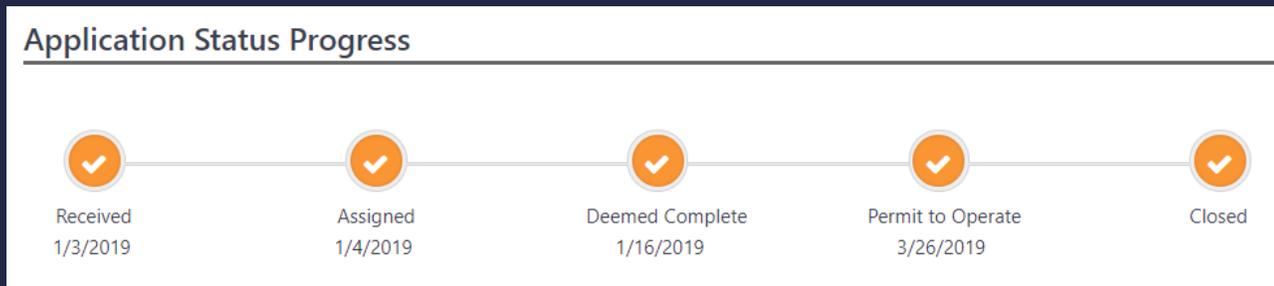
Transparency

Improving website and dashboard capabilities allows transparent communication of permitting application status and expected timeframes



Pending Application Dashboard

- Dashboard provides transparency and application tracking data for pending applications
- Two status indicator types:
 1. Time elapsed indicator
 2. Application status indicators
- Status progress bar:





Identifying Bottlenecks

- Two stage permit process



- Review of Dashboard shows that not all applications are awaiting District:
 - Awaiting District – Supervisor Review/Quality Assurance (14%)
 - Awaiting Facility – Information Requested (8%)
 - Awaiting Facility – Source Testing/Compliance (5%) – Aged Apps
- Dashboard upgrade needed to communicate anticipated application timelines



Transparency Actions

24m



Upgrade Permit Processing Dashboard to Better Communicate Permitting Timelines

12m



Enhance Website by Creating Portals for Communities and Facilities

24m



Post Engineering Policies on Website



New
strategies
required to
optimize
resource
utilization



Third-Party Assessment Initial Recommendations

- 13 recommendations to improve permit process and system
- Key recommendations from Phase 1:
 - Reported permit inventory numbers are artificially inflated and should not include applications less than 180 days or applications where no District action is possible
 - Require resubmittal of permit applications when scope of project changes
 - Deny applications if information or communication not received from facility within 120 days
 - Prioritize training and staff retention
 - Assess E&P salaries and career paths
- Final Third-Party Assessment will be posted on PEP website
 - Upcoming Phase 2 to focus on modernization and workflows



General Overview of Permitting Program

- Two Permitting Programs
 - Non-Title V – Minor Source (~60%)*
 - Title V – Major Source (~40%)*
- Title V - 320 of the largest emitting, complex facilities
 - Longer timelines and enhanced public noticing
 - Permits require U.S. EPA review
 - Triggers additional requirements
 - Requires enhanced evaluations
- Analysis of permit issuance timelines for equipment and both permitting programs

* Snapshot of pending applications as of July 2023



Streamlining





Streamlining Actions



Implement Recommendations from Third-Party Assessment



Submit 70% of new Title V applications to U.S. EPA within 18 months of Deemed Complete Date



Develop work plans to address aged applications



Consolidate Public Notice Functions



Streamlining Actions *(Continued)*

24m



Review and Update Aged Engineering Policies

24m



Develop Document Management System for Engineering Policies and Procedures

24m



Review CPP Program and Identify Opportunities to Improve Program Efficacy

PEP Summary

- **Highest Priority** - Staffing Actions in progress
- Efficiency goals for new applications
- Work plans to address older applications
- 5 Elements with 21 Enhancement Actions
 - 11 Actions are in Progress
 - 6 Actions are On Going
 - 9 Actions will be completed within 12 months
 - 9 Actions will be completed within 24 months
 - 1 Action related to Permit Processing Modernization will take more than 24 months



Additional Resource Needs

- E&P Needs to Implement PEP
 - Continue using short-term positions for succession planning
 - \$400,000 for retirees (September 2023)
 - Reassess staffing needs annually
- IM Needs for Modernization
 - 2 FTE to develop and maintain modernized permit processing software programs
 - Approximately \$3.2 million for Modernization (FY 24-25 Budget)



Next steps

- Reassess staffing needs and establish maintenance goals to ensure continuous improvement
- Upcoming challenges:
 - Amendments to RECLAIM and NSR
 - Expanded Title V applicability
 - Evolving federal permitting obligations
 - Upcoming rulemaking from past Community investigations
- Report back to SSC in Aug 2024 with updates and future resource needs