



Permitting Working Group

Meeting #1 – Waste Management Focus

June 18, 2024



Meeting Topics

- Working Group Purpose
- Permitting Enhancement Program Efforts
- Waste Management
- Permitting Process
- Permit Condition Discussion
- Feedback and Discussion

Permitting Working Group (PWG)

- PWG Purpose
 - Engage with industry and public on focused topics
 - Discussions and feedback to enhance permitting program
 - Information sharing to clarify permitting requirements, practices, and policies
- Permit Streamlining Task Force
 - Improve overall permitting efficiency and customer service
 - Focus on overall permitting program and policies
- Other public permitting-related meetings



Permitting Enhancement Program (PEP)

- Chair introduced PEP in March 2023
- Staff developed PEP plan in August 2023
 - PEP items currently being developed and implemented
- As staff developed PEP, greater need to communicate with public
 - PSTF
 - PWG
 - General Permitting Newsletter
 - <https://www.aqmd.gov/sign-up>



Engineering & Permitting

Goals and Objectives

- Annual Goals and Objectives
 - Increase Permitting Production
 - Public engagement
- At least 6 public meetings
 - Tentative schedule – subject to change*
 - Schedule does not include:
 - BACT Scientific Review Committee
 - Ad hoc public meetings
- First PWG Meeting
 - Waste Management Operations

2024

July 17 – PSTF

Sept 6 – Gov. Board (PEP)

Sept* – PSTF

Oct* – PWG

Dec – PSTF or PWG*

2025

Feb/Mar* – Gov. Board (PEP)

Mar – PSTF or PWG*

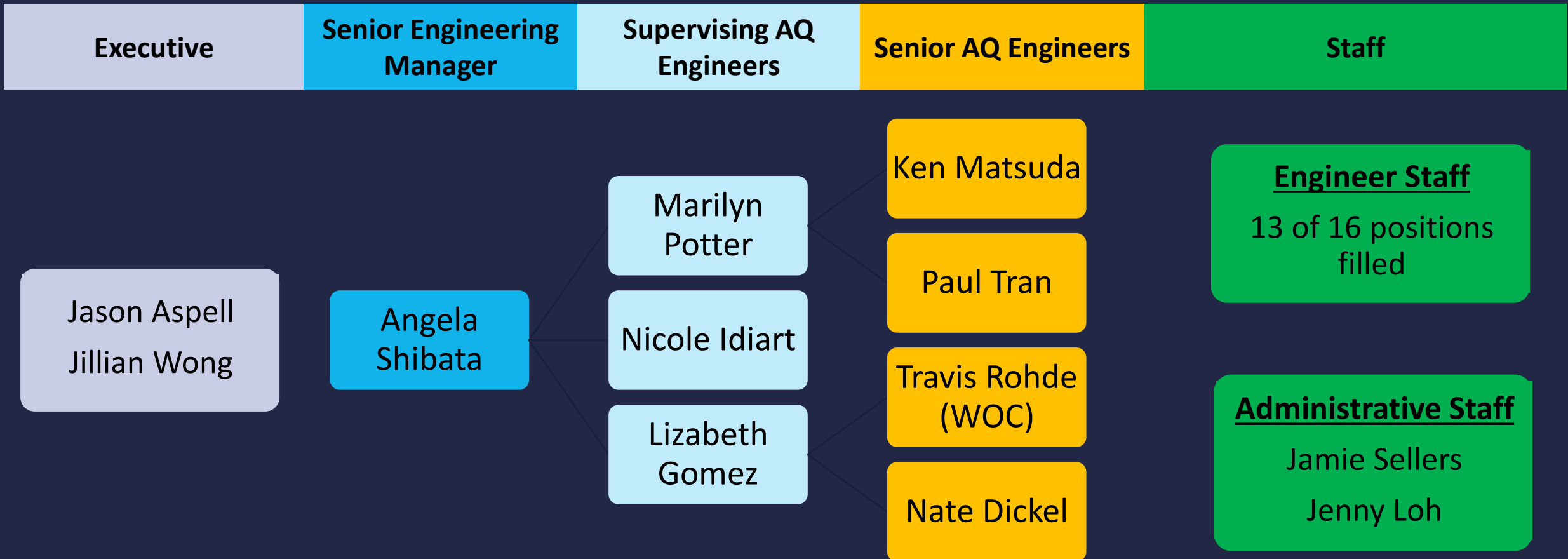
May – PSTF or PWG*

June – PSTF or PWG*

*Tentative schedule and/or meeting formats

Organization

Waste Management Team

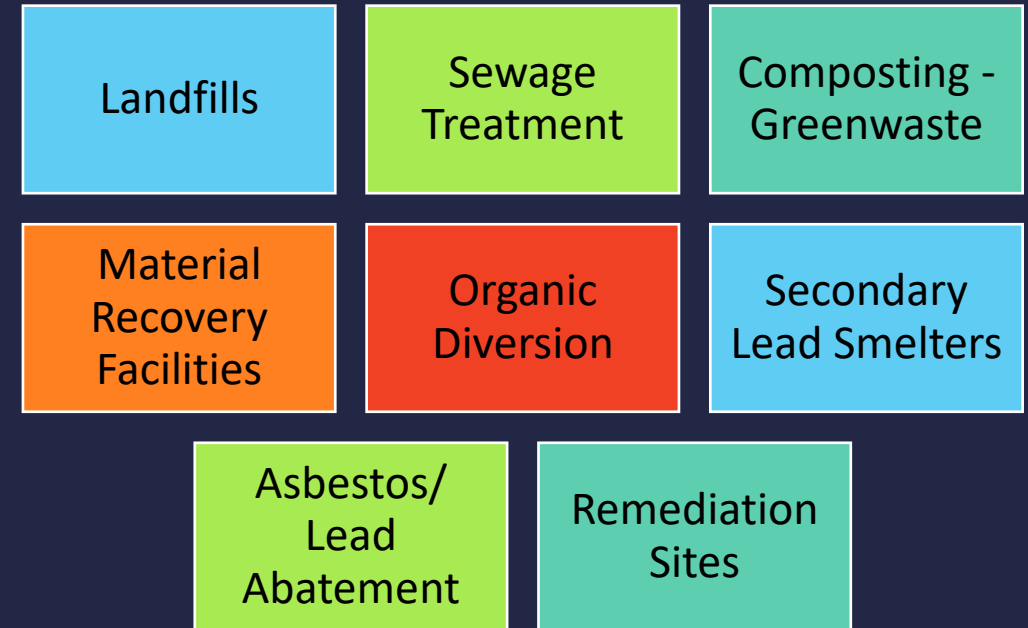


Waste Management Team Phone: (909) 396 - 3627

Waste Management

Permitting Working Group

- Why Waste Management PWG?
 - Unique operations
 - Public Services
 - Facility communication
 - Public nuisance potential
 - Ambient Air Monitoring - AB 1216
 - Growing sector
 - SB 1383
 - Industry concern over permitting timelines



Waste Management Team

Concerns expressed in public comments in January 2024 Administrative Committee

Staffing Turnover

- 16 AQ engineer positions
 - 2022 - 4 new hires
 - 2023/2024 - 9 new hires
 - Only 2 with 5+ years of AQ experience
- Nearly full staff turnover since 2017
- Untimely resignations and retirements
 - 3 supervisory staff 2022-23

Workload

- High number of pending applications
- Ongoing Investigations and Hearing Board cases
- POTW and Landfill Expansions
- CEQA Impacts
- Upcoming
 - DTSC remediation efforts
 - Dry Cleaners
 - Clean Up in Vulnerable Communities Initiative
 - Advanced Water Purification

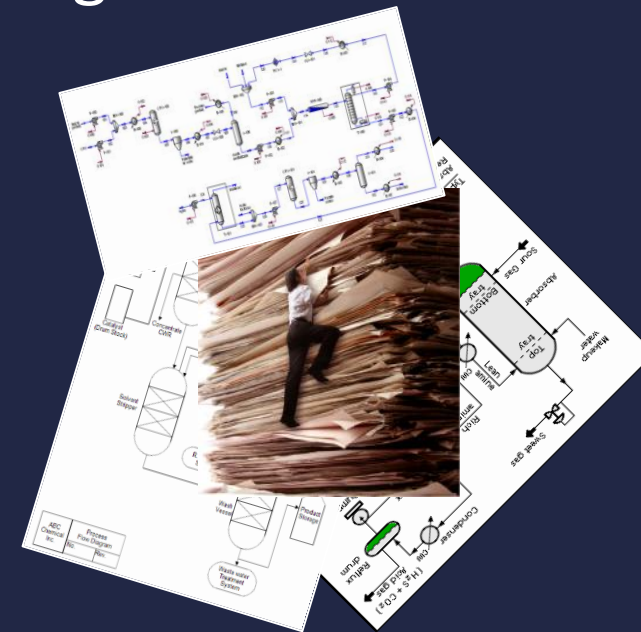
Supporting Efforts

- 2022 - Redistributed workload
- 2022-23 - Additional staff
- Q1 2024 - Cross Training
- May 2024 - New Supervisors
- Ongoing – Assistance from contractors and retirees
- Upcoming
 - PWG Waste Mgmt. meetings
 - Additional contractor assistance

Continued efforts to achieve permitting goals for Waste Management facilities

Permitting Process

- Application assignment
 - Considers experience and workload
- Engineer prescreening/information request and processing
 - Processing: Use templates and up to date references
- Applicant review of proposed draft permit
- Application review (2+ levels)
- Return to engineer for edits during/after review
- Public notice completion/EPA review for Title V Permit
- Approve permit



Permit Conditions

- Permit conditions are integral part of permit to enforce requirements
 - Establishes emission limits
 - Informs facility how to maintain compliance
 - Informs South Coast AQMD Enforcement staff how to verify compliance
- Enforceability
 - Monitoring
 - Recordkeeping
 - Reporting
- Standardized conditions
 - Streamline process
 - Facilities often request case by case considerations



Permit Conditions

Public Nuisance

- Rule 402 - Nuisance
- Unique considerations for Waste Management facilities
 - Recent incidents of Rule 402 violations impacting communities
- Promptly addressing odor sources minimizes impacts to community
- Developing and refining standard permit condition
 - Improve facility responsiveness after receiving violation

Permit Condition

Sample Condition Wording

No later than upon receipt of a Rule 402 Nuisance Notice of Violation (NOV) for odors,

the operator shall determine the odor source(s) as soon as possible and shall immediately undertake feasible remedial and/or mitigation measures to correct the cause of nuisance odors.

Records of NOV number, date, time, and location and description of the odor source;

detailed description of remedial and/or mitigation actions undertaken (which may include the documentation and implementation of new/revised operating procedures, protocols, and actions or guidelines);

and the name/affiliation of the person(s) who conducted remedial measures/actions shall be kept and maintained and made available to South Coast AQMD personnel upon request.

Ongoing Efforts

- Other standardized conditions in development
 - Establish industry expectations for permitting
 - Allowances may deviate from standard language, take more time
- Templates and Handbook
 - Utilization of consultants
- Best Available Control Technology (BACT)
 - Multiple Waste Management listings under development
 - Listings will be presented to BACT Scientific Review Committee
- Establish Working Group Priorities





Feedback and Ideas Listening Session

What topics should be covered?

How can PWG be best utilized?

PWG Waste Management

PWG General Topics

PWG meeting format, frequency



Next steps

- Submit PWG recommendations or requests to Roula El Hajal
 - relhajal@aqmd.gov; (909) 396-2763
- PSTF meeting July 17
- eNewsletter Sign Up
 - General Permitting
- Contact staff if you wish to discuss your specific permitting issues

