Permit Streamlining Task Force Subcommittee

December 5, 2019

Agenda

- Pending Applications Inventory Update
- On-Line Filing Update
- Dashboard Update
- Permit Processing Handbook Update

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Pending Application Inventory Update

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Pending Applications
(2016 – 2019)

7,348	6,057	5,561	4,798	4,705	4,318	3,969	3,721	3,572	3,510	3,435	3,362	3,393	3,363	

54%

Maintaining 50% Reduction

2nd Quarter 2016 — 3rd Quarter 2016 — 4th Quarter 2016 — 1st Quarter 2017 — 2nd Quarter 2017 — 3rd Quarter 2017 — 4th Quarter 2017 — 1st Quarter 2018 — 2nd Quarter 2018 — 3rd Quarter 2018 — 4th Quarter 2018 — 1st Quarter 2019 — 2nd Quarter 2019 — 3rd Quarter 2019

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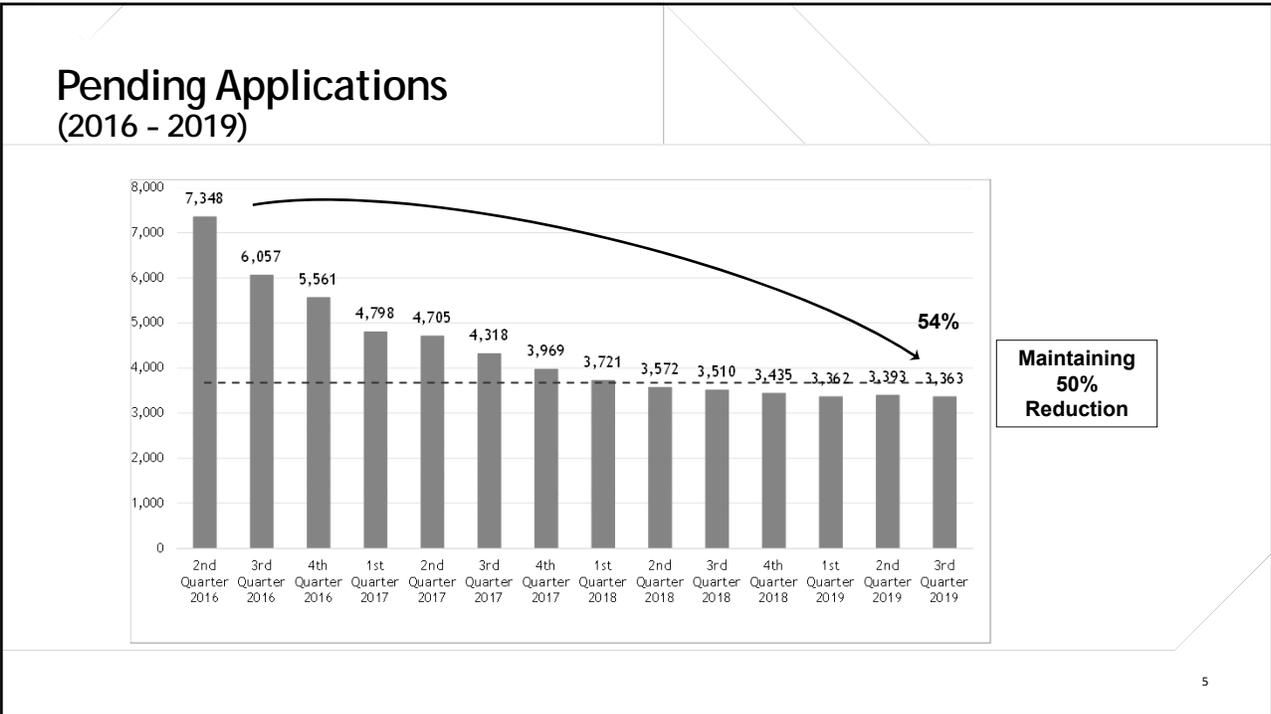
Pending Applications less PCs Issued
(2016 – 2019)
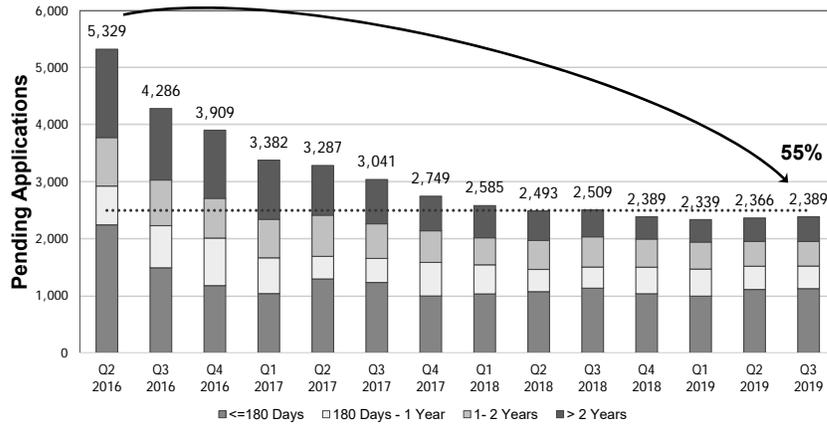
Ongoing Goal
Maintain pending applications without PC issued between 2,250 and 2,500

55%

Chart values: 5,329 · 4,286 · 3,909 · 3,382 · 3,287 · 3,041 · 2,749 · 2,585 · 2,493 · 2,509 · 2,389 · 2,339 · 2,366 · 2,389

X-axis: Q2 2016, Q3 2016, Q4 2016, Q1 2017, Q2 2017, Q3 2017, Q4 2017, Q1 2018, Q2 2018, Q3 2018, Q4 2018, Q1 2019, Q2 2019, Q3 2019

Y-axis: Pending Applications

Legend: ■ <=180 Days □ 180 Days - 1 Year ■ 1- 2 Years ■ > 2 Years

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Online Filing Update

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Online Rule 222 Registration

- Rule provides streamlined alternative to permits
  - Limited to low emitting equipment
  - Registration as condition for exemption
  - Categories tracked for prospective future reductions
- Currently file via pdf form printout submittal
- Online filing automates process
  - Data quality assurance
 - Online payment
 - Electronic issuance
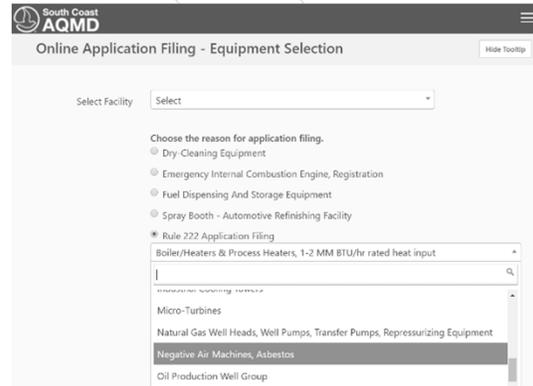
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Online Rule 222 Registration (cont.)

- Three main registered equipment types
  - 222-A, Negative Air Machines (Asbestos)
  - 222-B, Boilers (1-2 mmbtuh)
  - 222-C, Commercial Charbroilers
- Represents ~ 80% of R222 Registrations
- Online Filing and Issuance

Average Annual Registrations (2016-19)

Others, 321
Negative Air Machines, 534
Charbroilers, 181
Boilers, 374
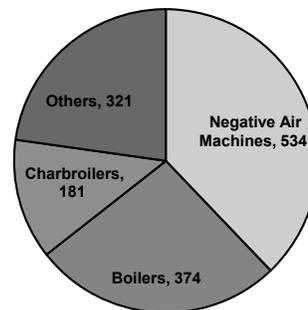
☐ Negative Air Machines ▨ Boilers ▨ Charbroilers ▨ Others

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Online Rule 222 Registration
Sample Screenshots

- Eligibility screen
- Redirects user if:
  - Permit required; or
  - Registration not required

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Online Rule 222 Registration
Sample Screenshots (cont.)

Allows for multiple registrations via single submittal

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Online Rule 222 Registration
Sample Screenshots (cont.)

Rule 222 Online Application Filing - Negative Air Machines, Asbestos   Hide Toolt

Application   Supplemental Documents   Payment   Submission

State: CA   Zip 91765   3962558

Application Information

Group 1 : Total Number of Applications - 1

Manufacturer: Model: 9103H   Equipment Type: Negative Air
Aerospace American   Machine

Number	Application Number	Serial Number
1	548265	1

Authorization

Name of Responsible Official: First Last

Four step process:
1. Form based data entry
2. Opportunity for supplemental document submittal
3. Payment
4. Attestation and submittal

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Online Rule 222 Registration
Sample Screenshots (cont.)

South Coast Air Quality Management District

Year   2019

Master Copy of Record

th Coast
QMD

DIAMOND BAR, CA 91765
Attn: First Last

Operating Parameters for Rule 222
Negative Air Machines

Retain these operating parameters and your filing receipt on site.

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this filing is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. The HEPA filters used in this equipment shall be certified by the manufacturer to have a minimum control efficiency of 99.97% on 0.3 μm particles.
4. Identification tag(s) or name plate(s) shall be permanently affixed and displayed on this equipment to show manufacturer model number and serial number, which should be in a position that is accessible for visual reading.
5. After use, this equipment must be emptied and cleaned within a negative air enclosure, and filters and waste collected with this equipment must be disposed as friable asbestos waste.
6. All maintenance works on this equipment which requires partial or total dismantling shall be

- Final registration review
- Receipt via email following attestation and submittal

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Online Rule 222 Registration
Next Steps

- Release for production
- Outreach for three main equipment types

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Pending Application
Status Dashboard Update

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Pending Application Status Dashboard
Initial Observations – Snapshot (October 2019)

Processing Status

- Roughly 60% awaiting action
- Awaiting actions split evenly between facility and agency

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Pending Application Status Dashboard
Initial Observations – Snapshot (October 2019, cont.)

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
A/I Request	14%	Engineering Evaluation and Administrative Processing	41%	Compliance Review Draft	5%	Supv/Mgr Review	7%
Related App A/I	1%			Public Notice Distr.	1%	Related App Proc.	5%
Fee Resolution	< 1%				< 1%	S/T Review	4%
						Policy Review	3%
				Conduct S/T	6%	Field Eval	3%
				Awaiting Constr.	3%	Other Agency Rev.	1%
						Public Notice	1%
						HRA / Modeling	< 1%

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Pending Application Status Dashboard
Ongoing Review

- Review larger awaiting action categories for streamlining opportunities
- Source testing working group
  - "Emissions Quantification and Testing Evaluation" (EQuaTE)
  - Additional online submittal, monitoring and tracking tools proposed
- Internal enhancements to Dashboard to improve granularity for a deeper dive into the data
- Continue to build and refine data in order to correlate residence time with status conditions
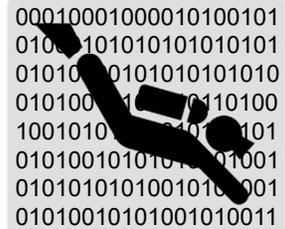
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0100 101010101010101
010100 0101010101010
010100   0110100
1001010    101  101
01010010101   01001
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Permit Processing
Handbook Update

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Background

- First published in 1989
- Served as reference for engineering evaluation of permit applications for commonly encountered equipment type:
  - ✓ Ensure uniform evaluation
  - ✓ Apply consistent and enforceable conditions
  - ✓ Train new or cross train existing engineers
  - ✓ Improve efficiency
- Included 19 sections, each focusing on an equipment category
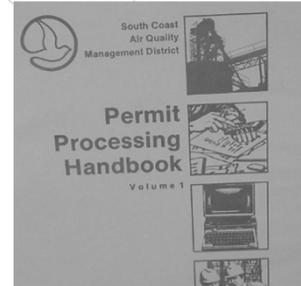
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Updating Permit Processing Handbook

Goals:
- Update handbook to reflect current requirements and practices
- Ensure consistent evaluation of similar equipment and resultant permit requirements
- Provide public and permit applicants insights to data needs and permit evaluation criteria
- Efficient permit processing

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Updating Permit Processing Handbook
(cont.)

In addition to updating specific chapters
on commonly encountered equipment, include:

- Permit Processing Overview
- Source / Emissions Characterization
- Regulatory Requirements: by Rule / Regulation
- Guiding Principles for Permit Writing
- Permit Evaluation Template

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Permit Processing Handbook
Equipment Chapters

- Separate chapters on basic and control
  equipment
- Each chapter to include:
  - Process description and air quality impact
  - Emission calculations/methods
  - Regulatory requirements & compliance evaluation
  - Sample permit conditions
  - Criteria for additional requirements/conditions

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Next Steps

- Drafts by third quarter
- Overview sections
- Five equipment chapters:
  - ✓ Abrasive Blasting
  - ✓ Dry Cleaners
  - ✓ Emergency IC Engines
  - ✓ Gasoline Refueling
  - ✓ Spray Booths

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Public Comment