



**PERMIT STREAMLINING
TASK FORCE
SUBCOMMITTEE
MEETING
December 16, 2020**



Permit Streamlining Task Force Subcommittee

December 16, 2020

Agenda



Pending
Application
Inventory



Pending Permit
Application
Status
Dashboard



Online Tools
Development



Permit
Processing
Handbook

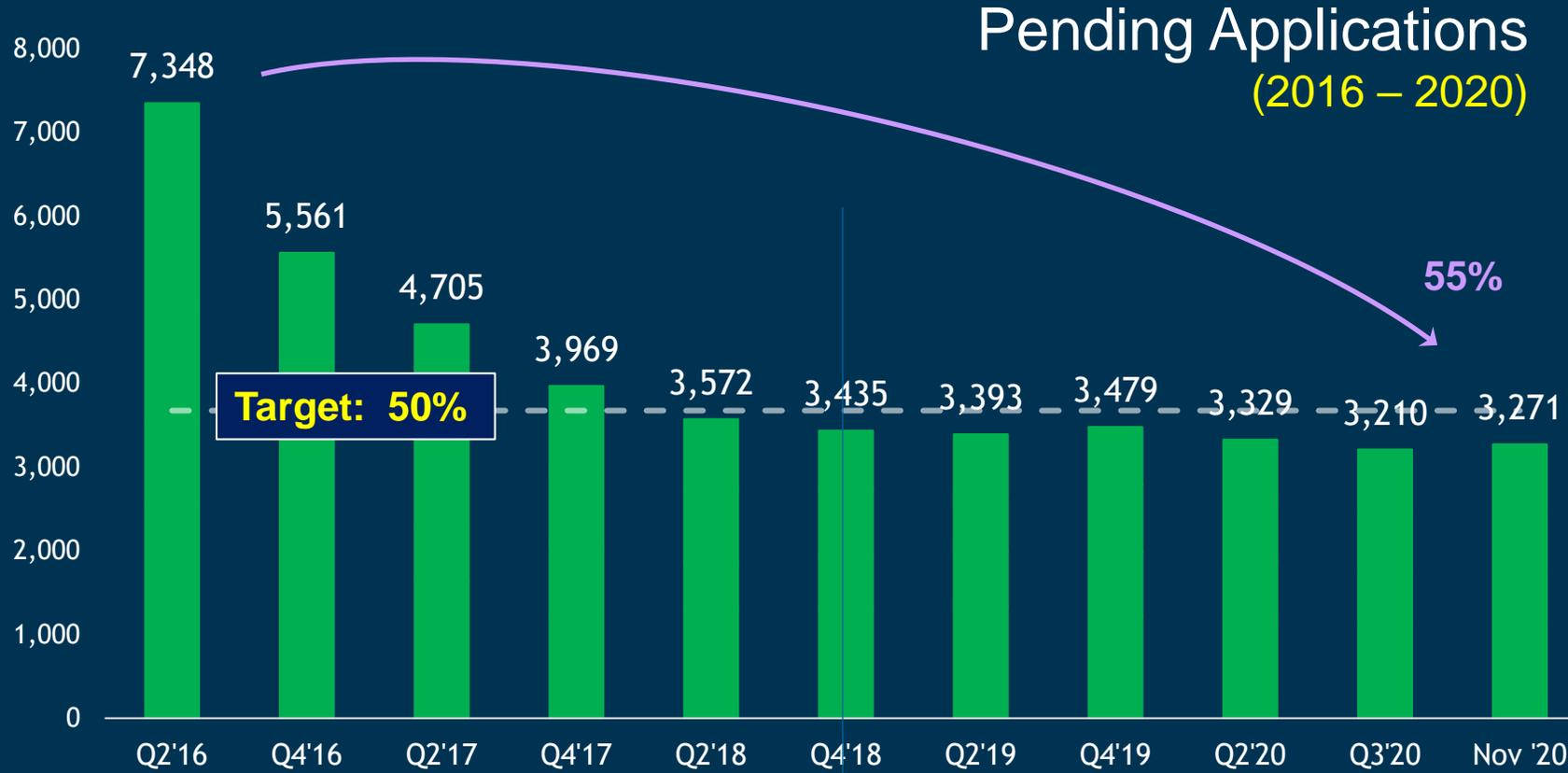


Other Issues
and
Public
Comment

Pending Application Inventory Update

Permit Processing

2016 Inventory Reduction Initiative

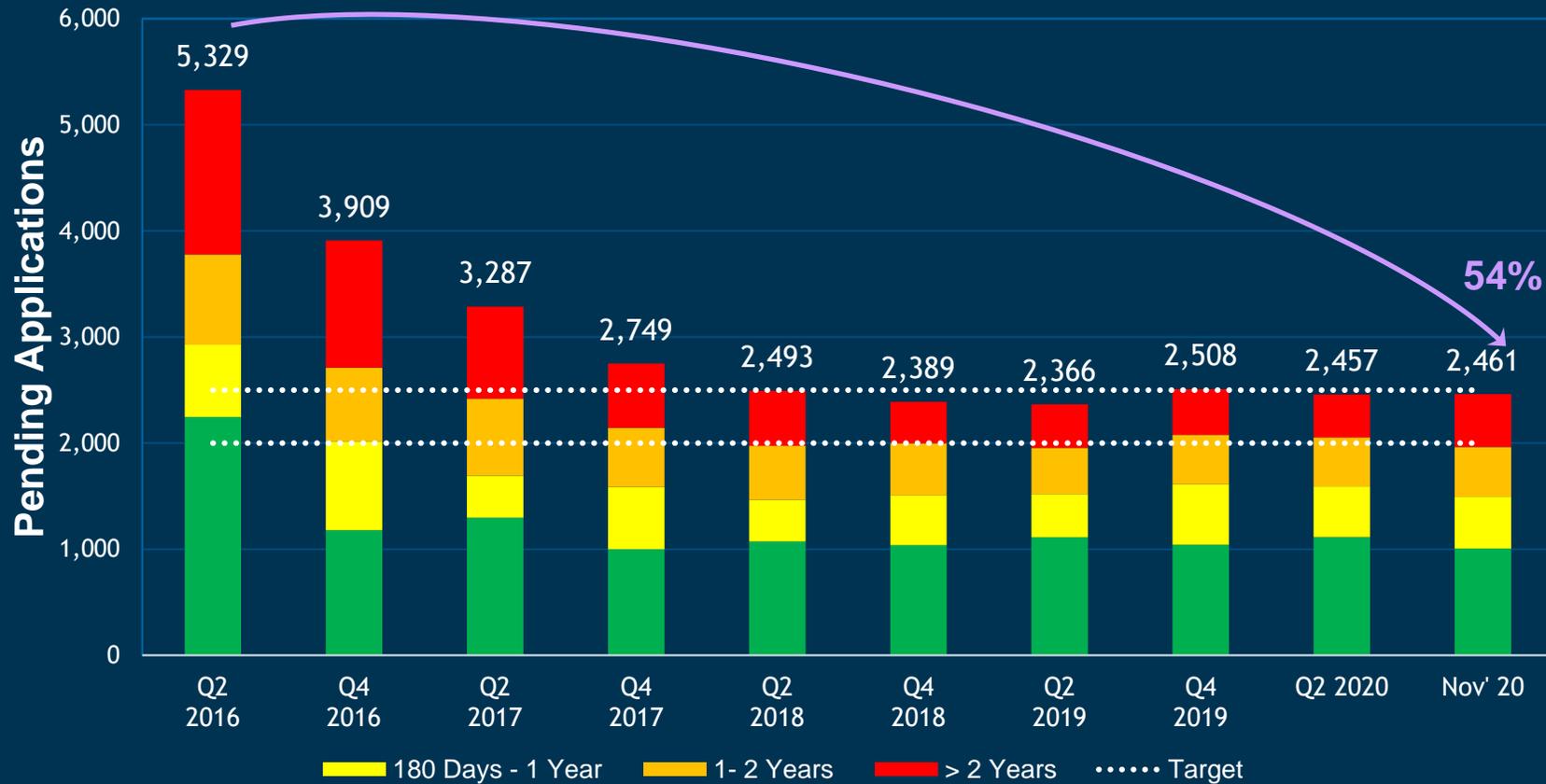


Target: 50%

55%

Achieved and continue to maintained 50% reduction goal set in 2016

Pending Applications less PCs Issued (2016 - 2020)



Ongoing Goal

Maintain pending applications without PC issued between 2,250 and 2,500

Inventory Management During COVID-19

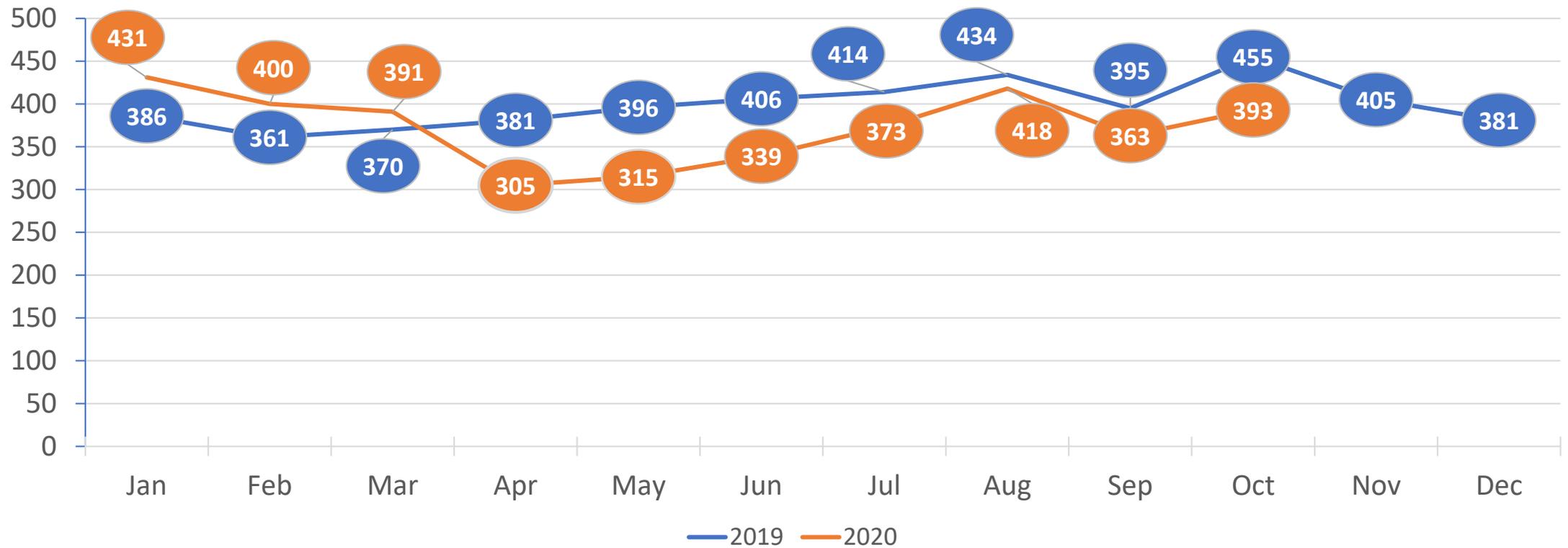
- > 80% Engineering Staff Teleworking
- Increased electronic submittals
 - US Mail routing
 - More electronic payment options
- Closely monitoring incoming applications
- Stay at home impacts:
 - HQ not open to public
 - Field visits
 - Face to face meetings



COVID-19 Permit Application Trends

Emission Trends

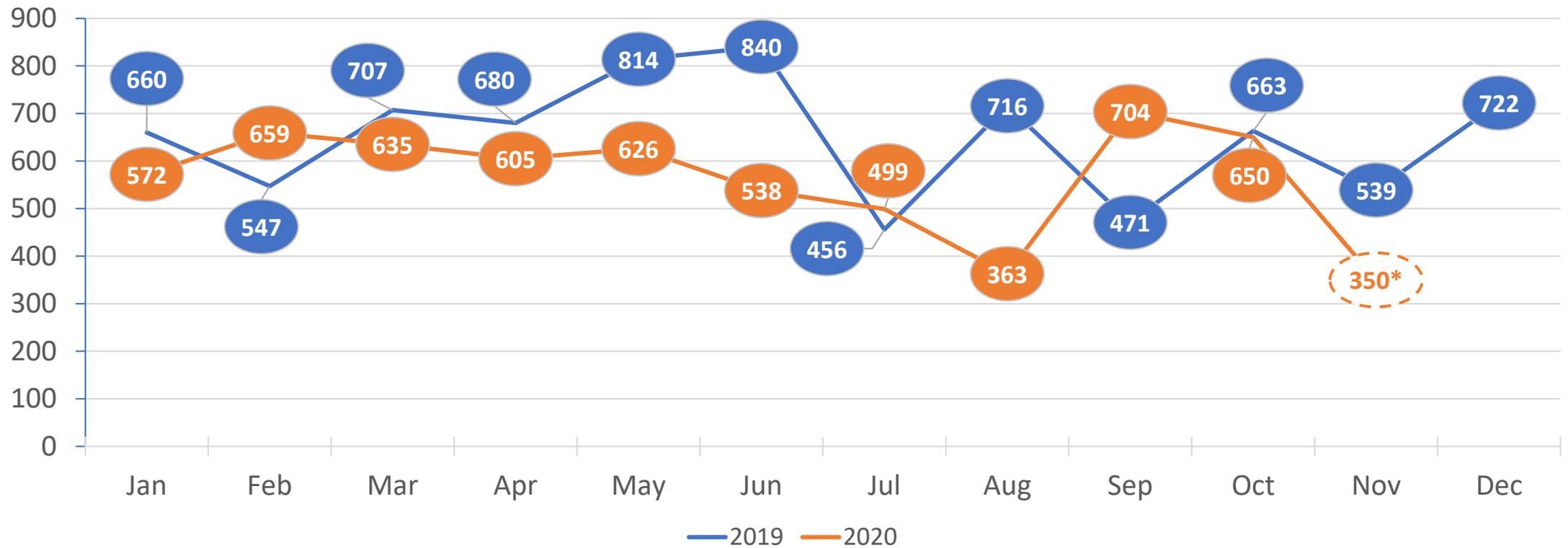
NOx Emissions, RECLAIM Major Sources (tons)



As of October 30, 2020

Permit Activity

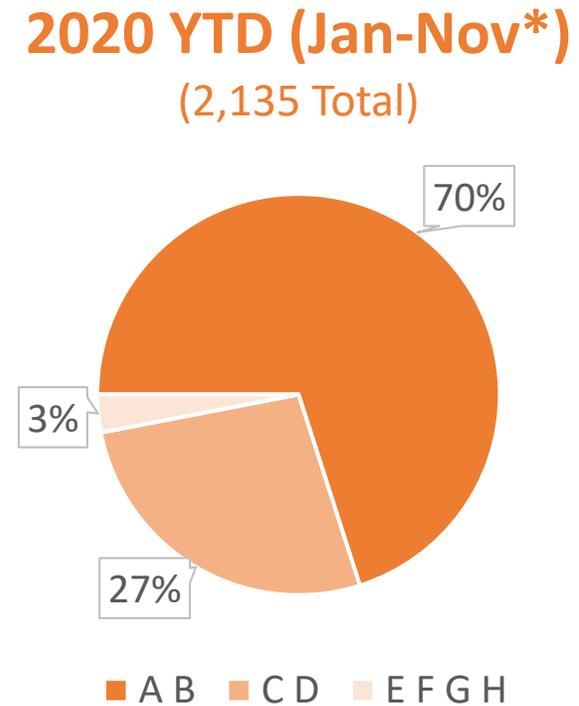
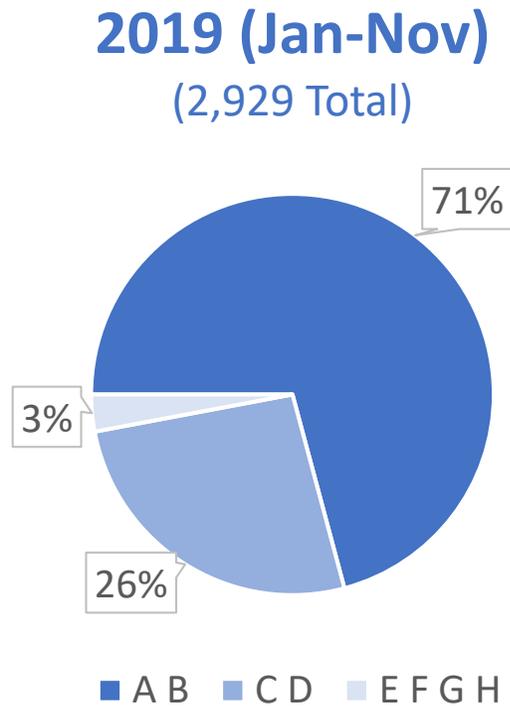
Number of Applications Received per Month



*Preliminary data as of November 30, 2020

Permit Activity (Cont.)

Equipment Applications Received (Percent, by Assigned Fee Schedule)

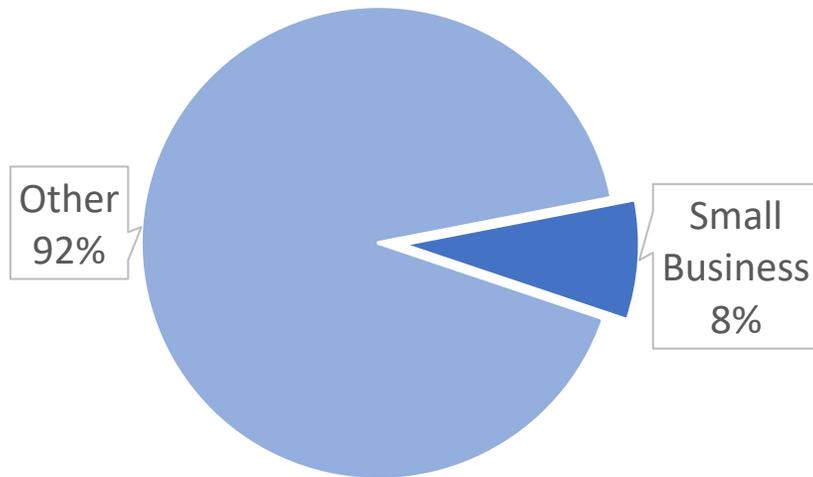


*November 2020 numbers preliminary

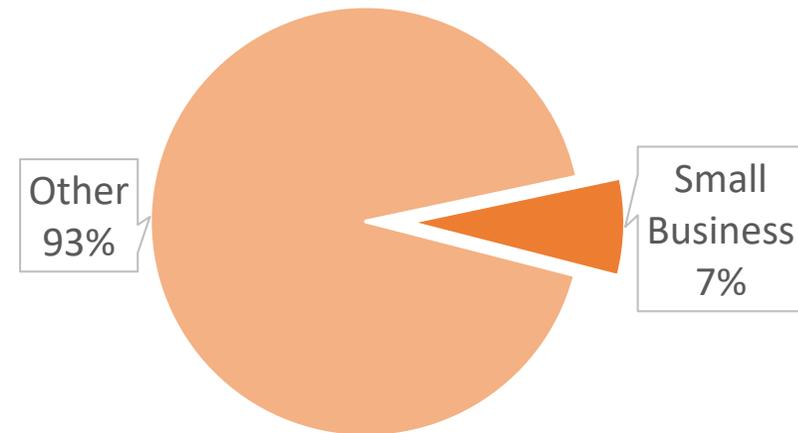
Permit Activity (Cont.)

Equipment Applications Received (Percent, Small Business vs. Other)

2019 (Jan-Nov)
(2,929 Total)



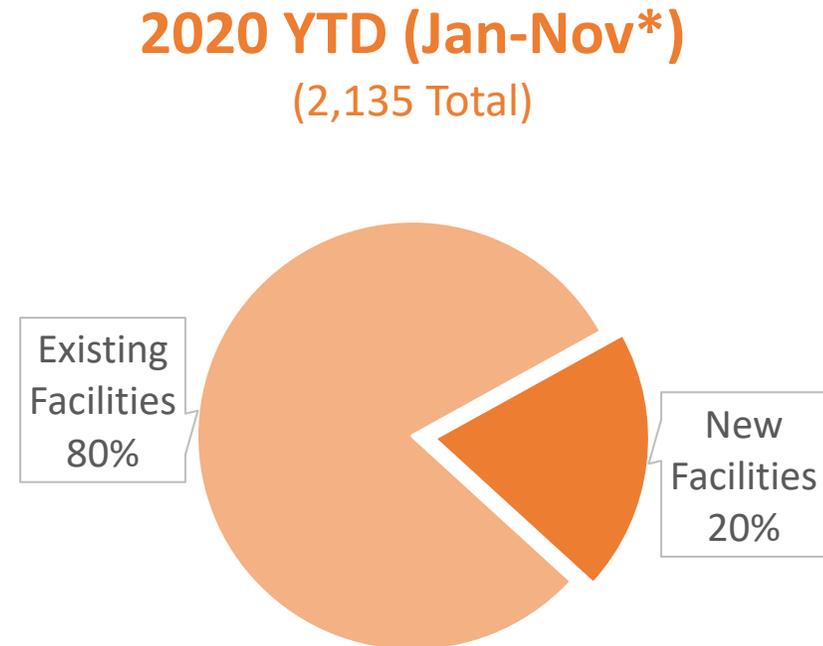
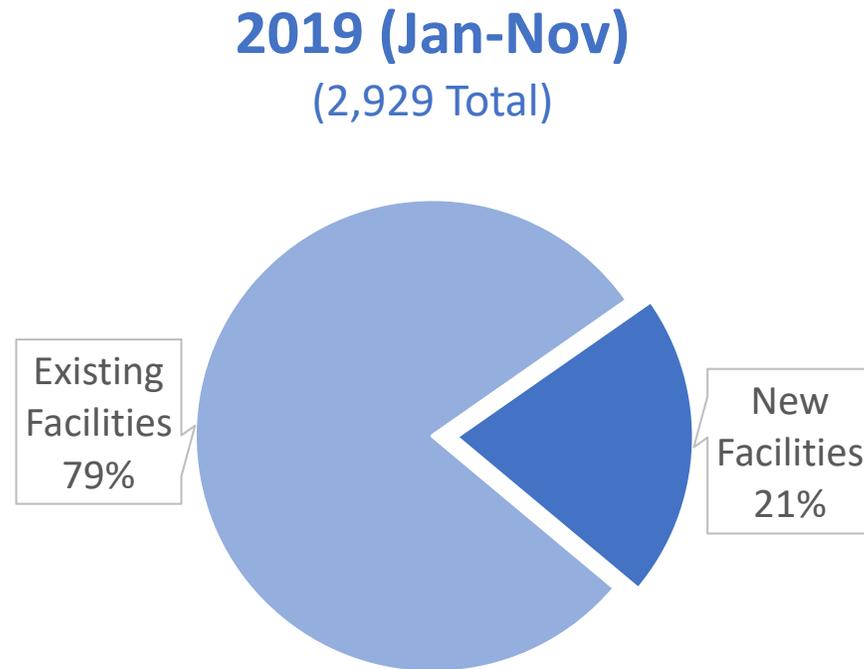
2020 YTD (Jan-Nov*)
(2,135 Total)



*November 2020 numbers preliminary

Permit Activity (Cont.)

Equipment Applications Submitted (Percent, New vs. Existing Facilities)

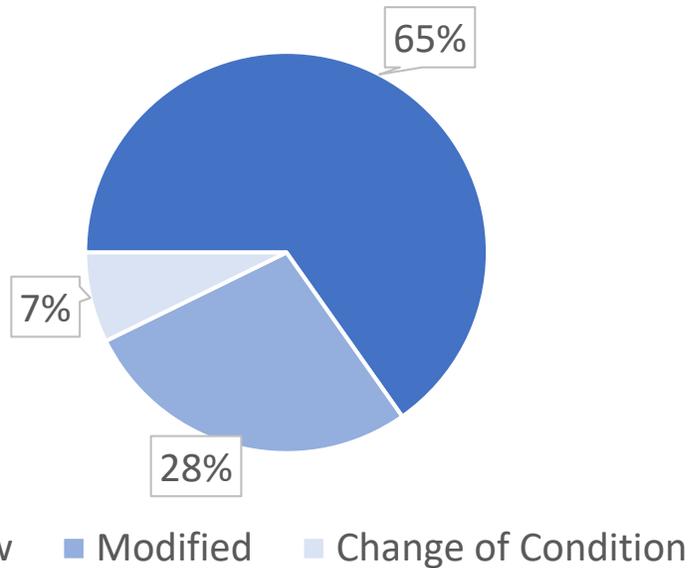


*November 2020 numbers preliminary

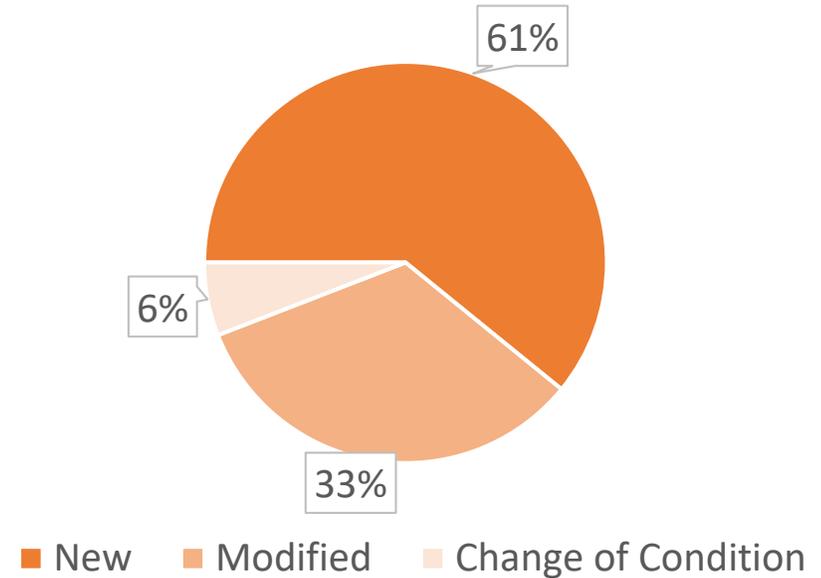
Permit Activity (Cont.)

Equipment Applications Received (New / Modified / Change of Condition)

2019 (Jan-Nov)
(2,929 Total)



2020 YTD (Jan-Nov*)
(2,135 Total)



*November 2020 numbers preliminary

Pending Permit Application Status Dashboard Update

Pending Permit Application Status Dashboard

Governing Board initiative to increase transparency

- Online ability to view status of individual applications
- Integrate with existing F.I.N.D. application

SENTINEL PEAK RESOURCES CALIFORNIA, LLC Close

Address: 1400 N MONTEBELLO BLVD, MONTEBELLO, CA 90640

Facility ID: 184288

Status: ACTIVE

Back Fees Due: No.

SIC Code: 1311 CRUDE PETRO AND NATURAL GAS

Equipment List

30 Results

Sort: Application Number

609423 FLARE, OTHER Application Status : APPLICATION CHANGED FROM CLASS I - III Application Date : 12/26/2018 Type : Control	602853 FACILITY PERMIT AMEND- RECLAIM ONLY Application Status : BANKING/ PLAN GRANTED, NON BILLABLE Application Date : 04/06/2018 Type : Basic	602159 MICRO-TURBINE NOT NAT GAS,METHANOL OR LPG Application Status : APPLICATION CHANGED FROM CLASS I - III Application Date : 03/27/2018 Type : Basic
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South Coast AQMD

Facility Information Detail (F.I.N.D.)

Select Search Type

Find a Facility

Name

Street

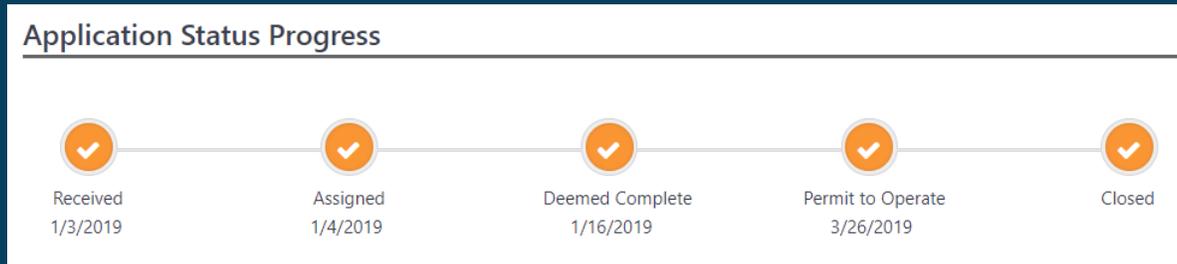
City

Zip

REC

Dashboard Status Indicators

- Two status indicator types:
 - Time elapsed indicator
 - Application status indicators
- Status progress bar:



Public Participation and Development

- Initial Internal Roll-Out Mid-2018
- Multiple Software Enhancements
- Data Verification
- Launched to Public May 2020

F.I.N.D. <https://xappprod.aqmd.gov/find>

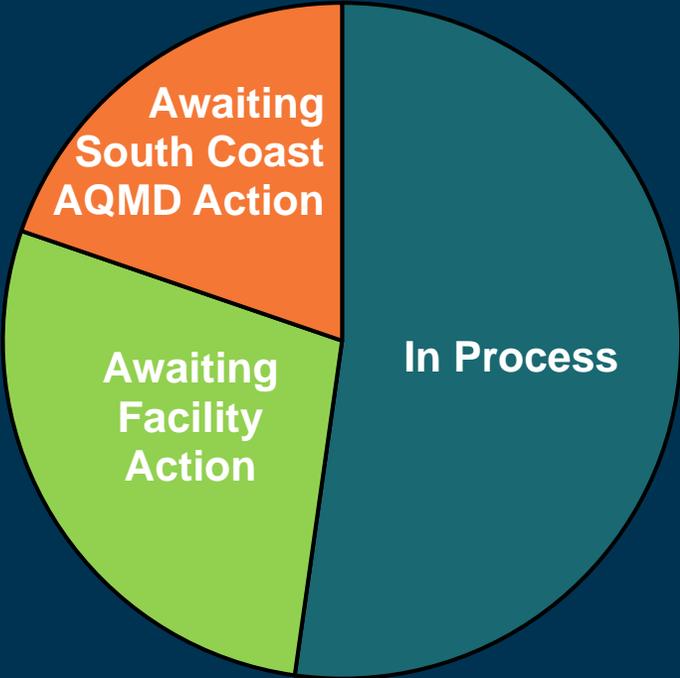
Pending Permit Application Status Dashboard

Initial Case Study

October 2019



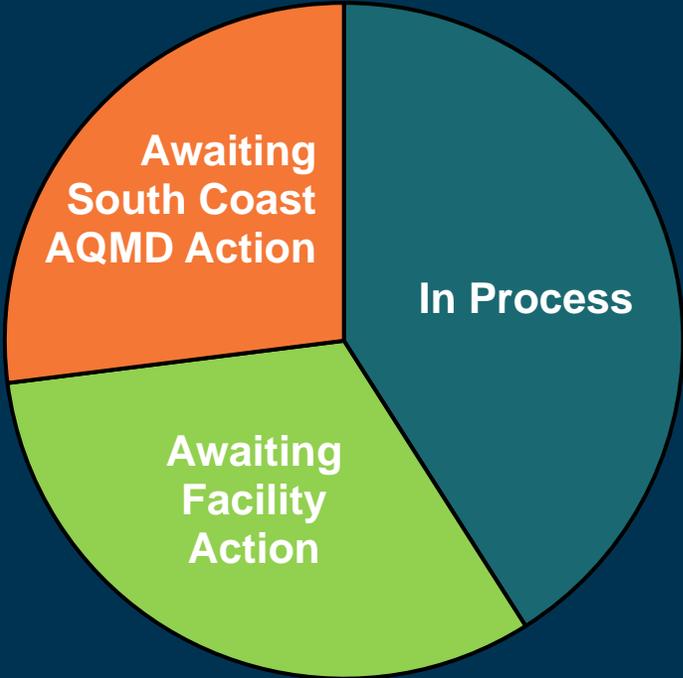
April 2020



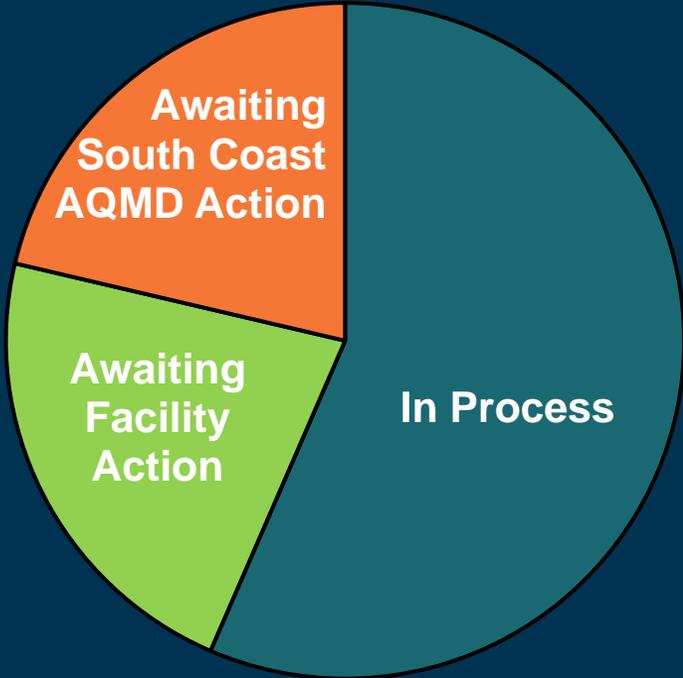
Pending Permit Application Status Dashboard

November 2020 Snapshot

October 2019



November 2020



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	5%	Supv/Mgr Review	7%
Related App A/I	1%			Review Draft	1%	Related App Proc.	5%
Fee Resolution	< 1%			Public Notice Distr.	< 1%	Source Test Review	4%
				Conduct Source Test	6%	Policy Review	3%
				Awaiting Constr.	3%	Field Eval	3%
						Other Agency Rev.	1%
						Public Notice	1%
						HRA / Modeling	< 1%

Pending Permit Application Status Dashboard

April 21, 2020 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add. Info. (A/I) Req.	12%	Engineering Evaluation and Administrative Processing	52%	Compliance Review Draft	1%	Supv/Mgr Review	8%
Related App A/I	< 1%			Public Notice Distr.	1%	Related App Proc.	3%
Fee Resolution	< 1%			Conduct Source Test	< 1%	Source Test Review	3%
				Awaiting Constr.	5%	Policy Review	1%
					6%	Field Eval	1%
						Other Agency Rev.	1%
						Public Notice	< 1%
						HRA / Modeling	< 1%

Pending Permit Application Status Dashboard

November 20, 2020 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add. Info. (A/I) Req.	8%	Engineering Evaluation and Administrative Processing	57%	Compliance	< 1%	Supv/Mgr Review	10%
Related App A/I	< 1%			Review Draft	< 1%	Related App Proc.	3%
Fee Resolution	< 1%			CEQA	1%	Source Test Review	3%
				Conduct Source Test	4%	Policy Review	2%
				Awaiting Constr.	6%	Field Eval	< 1%
						Other Agency Rev.	2%
						Public Notice	< 1%

Launched

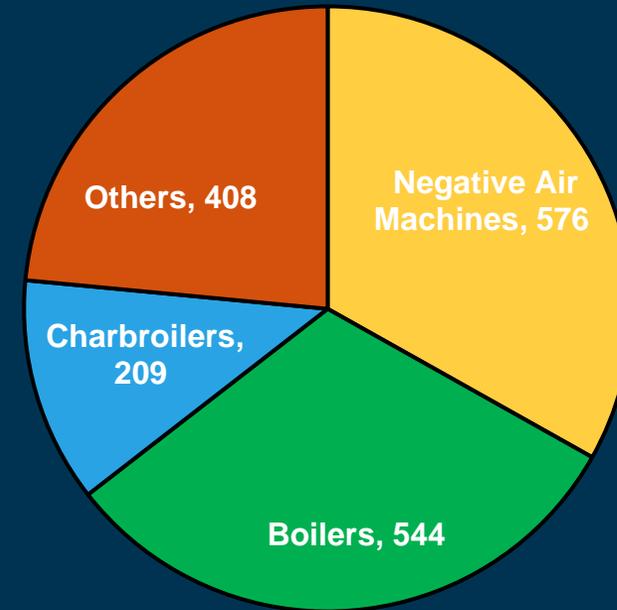
Discussion / Improvement suggestions

Online Filing Update

Online Rule 222 Registration

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

Average Annual Registrations (2016-19)



■ Negative Air Machines ■ Boilers ■ Charbroilers ■ Others

Online Filing Activity

Online Filing Completions



- Good utilization of Negative Air Machine module
- Extended outreach to asbestos contractors
- Other modules limited activity due to recent current events
- Planned additional outreach to dry cleaners

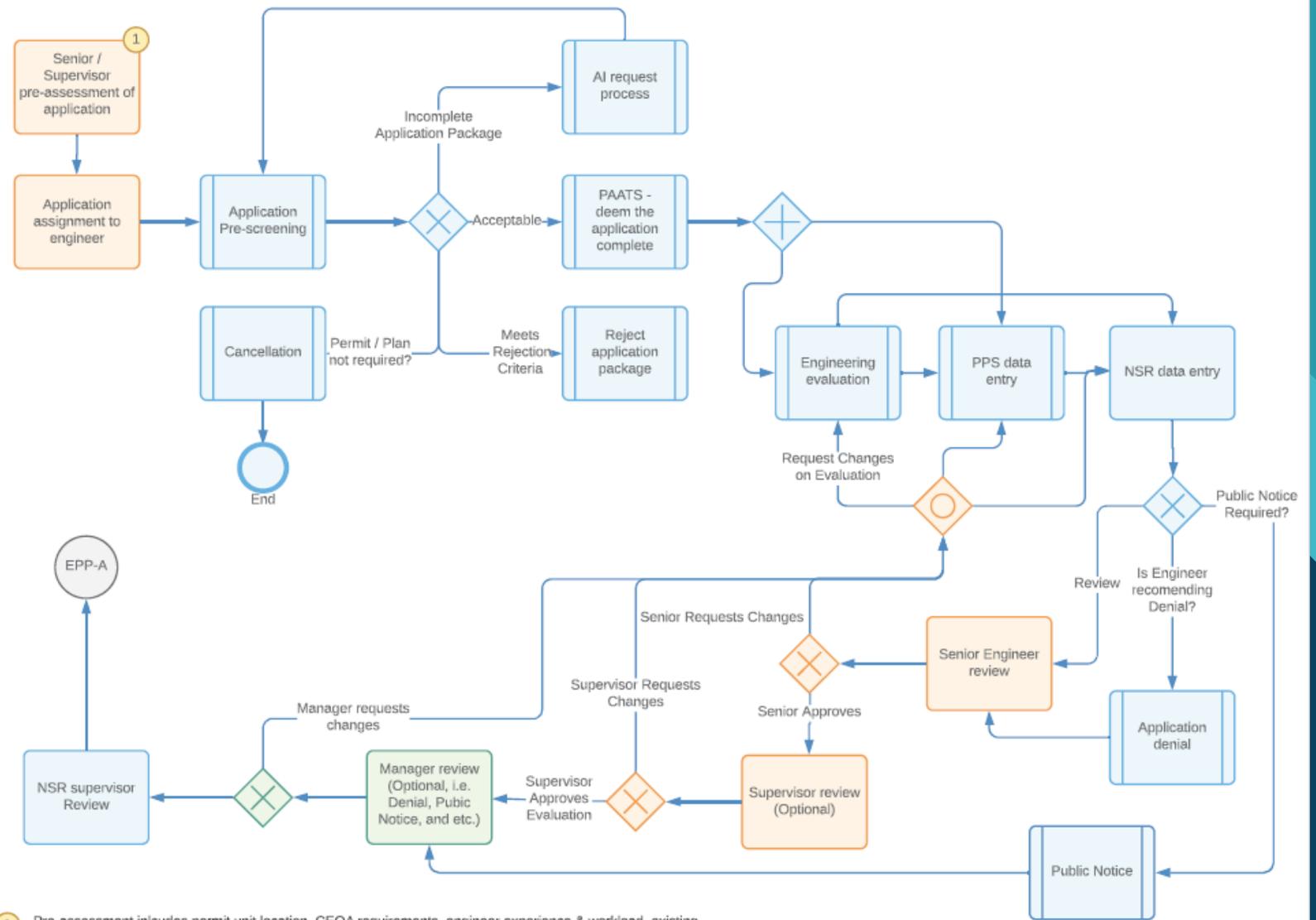
Development

- New software releases for data cleanup
- Incorporate public notice guideline
- Emergency IC Engine registration in review
- Workflow updates
 - “As is” process review complete
 - Lessons learned in expanded teleworking environment

Workflow

“As-Is” Process Flow

Engineer Permitting Process
(Regular Facility Permitting Applications)



1 Pre-assessment includes permit unit location, CEQA requirements, engineer experience & workload, existing facility/application assignment of engineers.

Permit Processing Handbook Update

Updating Permit Processing Handbook

Goals:

- Update handbook to reflect current requirements and practices
- Ensure consistent evaluation of similar equipment and resultant permit requirements
- Primary purpose for internal use for training new staff and to promote efficient permit processing and best practices
- Provide public and permit applicants insights to data needs and permit evaluation criteria



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- A. Introduction
 - B. Permitting Authority
 - C. Permit Processing Overview
 - D. Permit Application Types and Completeness Considerations
 - E. Emissions Characterization
 - F. Regulatory Requirements- Overview
 - a. Federal and State Requirements
 - b. South Coast AQMD Rules
 - c. Regulatory Considerations
 - d. General Rules
 - e. Source-Specific Rules (Reg XI)
 - G. Regulatory Requirements – Detailed Review
 - a. Rule 212 Public Notice
 - b. Reg XIII: New Source Review
 - c. Reg XIV: Toxics and Other Non-Criteria Pollutants
 - H. Permit Writing Guiding Principles
 - I. Permit Evaluation Template
- EMISSION SOURCE CHAPTERS
- Equipment and Process Categories
 - Control Equipment

Progress

Commitment

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

Progress

- Overview sections
- Equipment chapters:
 - ✓ Unconfined Abrasive Blasting
 - ✓ Dry Cleaners
 - ✓ Gasoline Service Stations
 - ✓ Spray Enclosure – Fundamentals
 - ✓ Spray Enclosure – Special Cases

Sample chapters

(Gasoline Service Stations)

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Sample chapters

(Gasoline Service Stations, cont.)

EMISSION FACTORS:

The hydrocarbon and benzene emissions from storage tank filling and motor vehicle refueling operations are estimated by using appropriate emission factors summarized in the following table. These emission factors were developed by District's Planning staff.

I. Emission Factors and Control Efficiencies

The following table summarizes the uncontrolled ROG emission factors in pounds per 1,000 gallons of gasoline throughput, benzene, ethylbenzene, and naphthalene content of gasoline and control efficiencies.

Emission Factors and Control Efficiencies for Underground Tanks

	Loading	Breathing	Refueling	Hose Permeation	Spillage (a)
ROG (b)					
Uncontrolled ROG Emission Factors (lbs/1000 gallons)	7.70	0.76	8.4	0.009	0.24 (a)
Control Efficiency	98%	96.8%	96.2%	0%	0%
Controlled ROG Emission Factors (lbs/1000 gallons)	0.15	0.024	0.32	0.009	0.24
Toxic Air Contaminants (TACs), weight % (c)					
Benzene Emission Factors (lbs/1000 gallons)	0.455% 0.000683	0.455% 0.000109	0.455% 0.00146	0.455% 0.000041	0.707% 0.0017
Ethylbenzene Emission Factors (lbs/1000 gallons)	0.107% 0.000161	0.107% 0.0000257	0.107% 0.000342	0.107% 0.00000963	1.29% 0.0031

PROCESS DESCRIPTION:

The gasoline storage and dispensing facility is used to store and dispense three different grades of gasoline. This facility is equipped with CARB certified Phase I and Phase II vapor controls, which complies with Rule 461. Furthermore, these vapor controls are considered to be T-BACT, which complies with Rule 1401. Finally, the project will not result in a net emission increase and thus will comply with Reg. XIII.

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Toxic Air Contaminants (TACs), weight % (c)					

Sample chapters

(Spray Booth, Fundamentals)

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Sample chapters

(Spray Booth, Fundamentals, cont.)

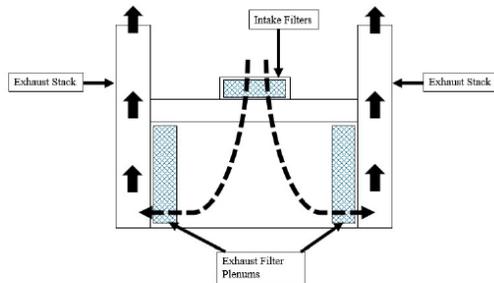


Figure J(E)-3. Side-downdraft Spray Booth (side view)

J(E).2.1.4 Downdraft

Downdraft spray booths have intake filters located on the ceiling and exhaust filters located on the floor. Air flows down from the ceiling and through the floor.

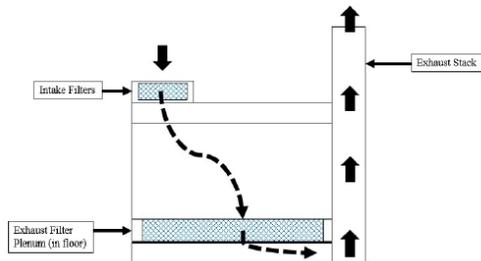


Figure J(E)-4. Downdraft Spray Booth (side view)

- Only one surface coating operation may be conducted in this equipment at any given time. Surface coating operations include, but are not limited to, application of materials to articles, surface preparation, sanding, scuffing, demasking, and equipment clean-up.

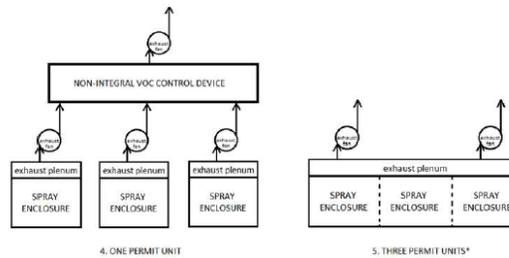
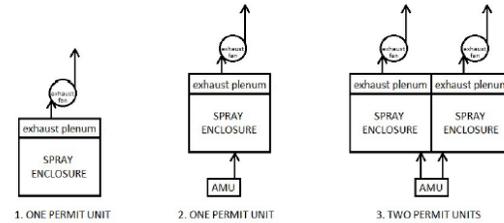


Figure J(E)-8. Example permit boundary determinations. Dashed lines represent temporary partitions (e.g. curtains). Solid lines represent permanent partitions (e.g. walls).

Table J(E)-1. Summary of control equipment efficiencies

Control Method	Type of Emissions Controlled	Control Efficiency
Fiberglass, Panel, GFS Wave, Paint Pockets, Accordion Filters (Andreae), Pocket	PM	90%
Water-wash Curtains	PM	90%
Baghouse	PM	99%
Cartridge	PM	99%
HEPA	PM	minimum of 99.97% at 0.3 microns
ULPA	PM	minimum of 99.999% at 0.12 microns
Scrubber	PM	determined via source test
Thermal Oxidizer	VOC	minimum efficiency required per Regulation XI, determined via source test
Carbon Adsorber	VOC	determined via source test

J(E).5 Exhaust Airflow

There are three ways that air is exhausted from a spray enclosure: (1) vented to the outside atmosphere; (2) vented to a non-integral control device; or, (3) vented back into the building. The direction of the exhaust air is important because it will affect dispersion of the exhaust constituents and, therefore, how the health risk from toxic materials is calculated.

J(E).5.1 To the outside atmosphere via exhaust stack

The exhaust stack height, orientation, and weather hood type will affect how emissions are discharged and dispersed. This equipment is treated as a point source for health risk assessment calculations.

J(E).5.1.1 Stack Height

Stack height is measured from the ground elevation to the top of the stack. If the stack is above a roof, the discharge point must be at least 6 feet above the roof surface (per fire code). If stack height is not provided, it is permissible to assume stack height = building

Next Steps

Early 2021

- Confined Abrasive Blasting
- Dry Particulate Controls
- Crematories
- Emergency IC Engines

Additional Chapters

- Boilers, SCRs
- Petroleum Storage Tanks
- Asphalt, Concrete Batch Plants
- Lead Melting
- IC Engines
- Printing Operations
- RTOs, Refinery Flares, Bulk Loading/Unloading
- Carbon Adsorbers

Feedback

- Volunteers to review and provide feedback on:
 - Gasoline dispensing facilities
 - Spray booth
- Type of feedback
 - Level of detail
 - Format / readability
 - Clarification points
 - Additional supporting references / citations

Other Business



Public Comment