



**PERMIT STREAMLINING
TASK FORCE
SUBCOMMITTEE
MEETING
June 24, 2020**

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**Permit Streamlining Task
Force Subcommittee**
June 24, 2020

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Agenda

- 
Pending Application Inventory
- 
Pending Permit Application Status Dashboard
- 
Online Tools Development
- 
Permit Processing Handbook
- 
Public Comment

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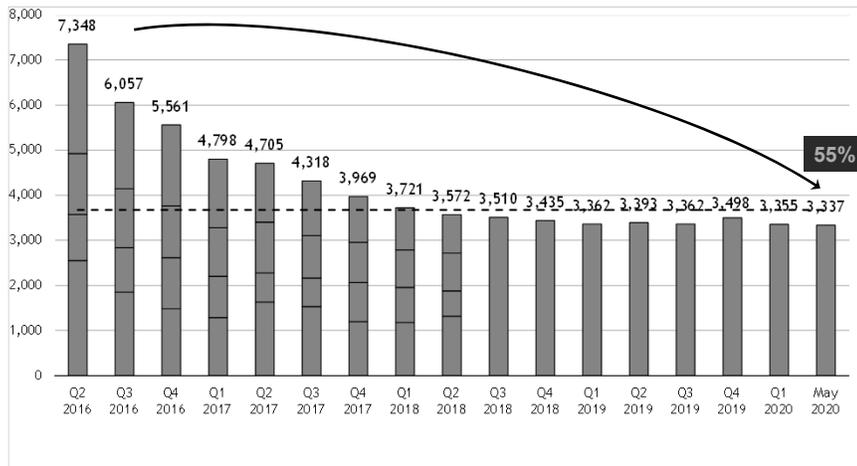
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Pending Application Inventory Update

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Pending Applications (2016 - 2020)

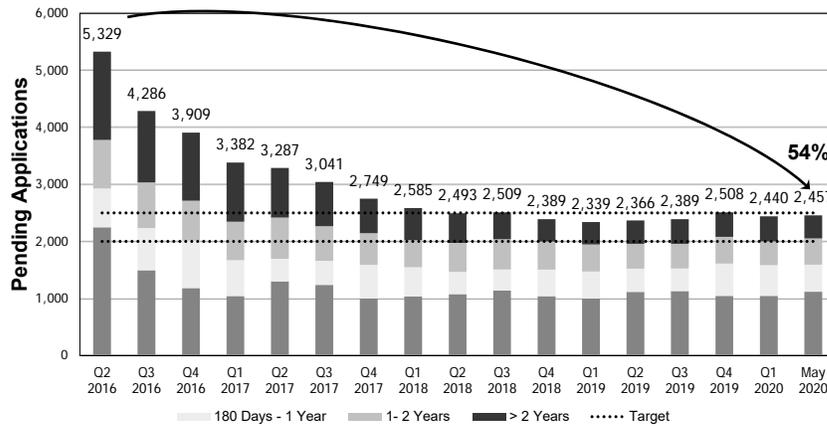


**Maintaining
50%
Reduction**

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Pending Applications less PCs Issued (2016 - 2020)



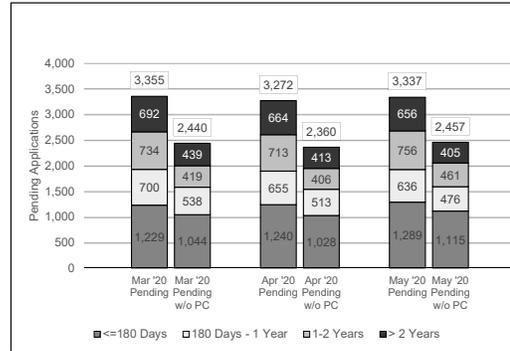
Ongoing Goal
Maintain pending applications
without PC issued between
2,250 and 2,500

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Inventory Management During COVID-19

- > 80% Engineering Staff Teleworking
- Bootstrapped electronic permit processing
- Closely monitoring incoming applications
- Stay at home impacts:
 - Field visits
 - Face to face meetings
 - CPP exam



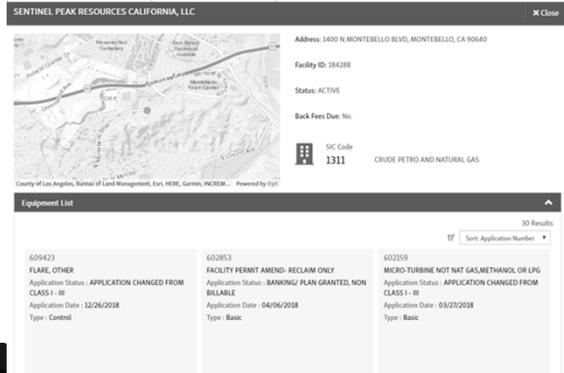
Expanded teleworking provides an opportunity to explore paperless processing approaches

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



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Dashboard Status Indicators

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



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Public Participation and Development (Cont.)

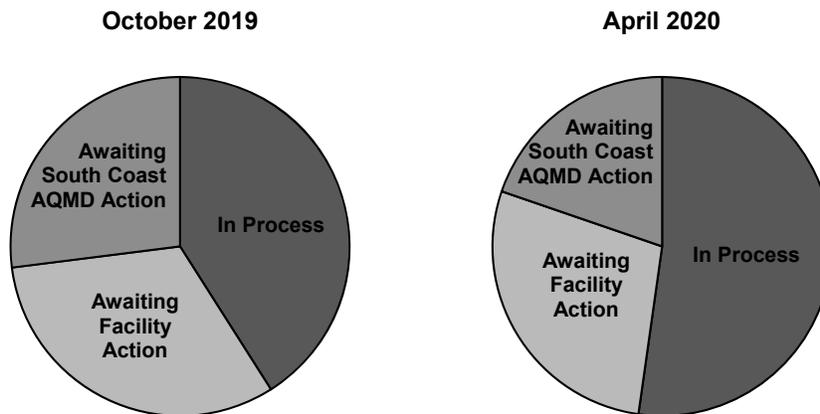
- Initial Roll-Out Mid-2018
- Multiple Software Enhancements
- Testing with Full Enhancements
- Data Verification Over Last 6 Months

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

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Pending Permit Application Status Dashboard Initial Observations



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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%			Conduct Source Test Awaiting Constr.	< 1%	Source Test Review	4%
						Policy Review	3%
						Field Eval	3%
						Other Agency Rev.	1%
						Public Notice	1%
						HRA / Modeling	< 1%

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Pending Permit Application Status Dashboard

April 21, 2020 Snapshot

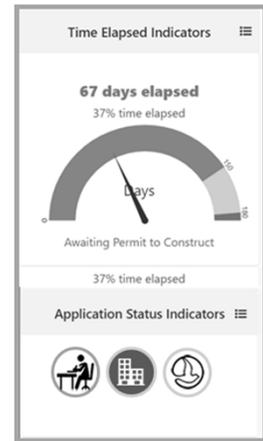
Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add. Info. (A/I) Req.	12%	Engineering Evaluation and Administrative Processing	52%	Compliance Review Draft	1%	Supv/Mgr Review	8%
Related App A/I	< 1%			Public Notice Distr.	1%	Related App Proc.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

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Launch

- Increases transparency and communication with facilities and community
 - Provides visual feedback on status
 - Provides visual indicator on time elapsed
 - Assists staff with workload management
- Supports internal resource allocation



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Online Filing Update

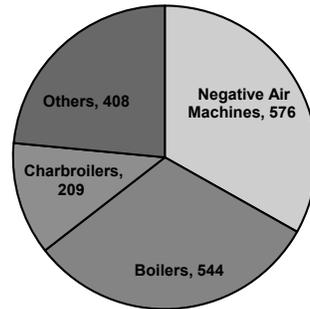
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Online Rule 222 Registration

- 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)



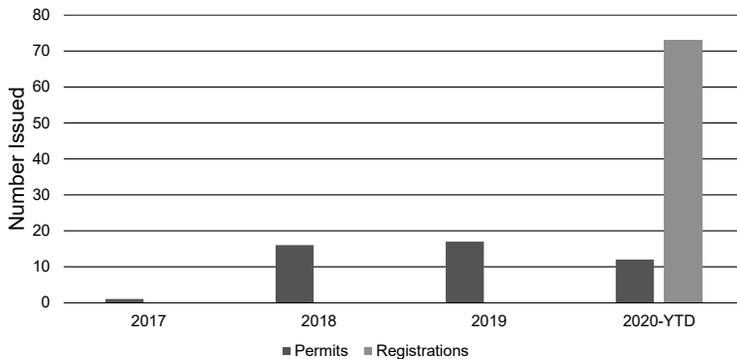
Legend: Negative Air Machines (light gray), Boilers (medium gray), Charbroilers (dark gray), Others (black)

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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

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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

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Permit Processing Handbook Update

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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
- Efficient permit processing and effective training
- Provide public and permit applicants insights to data needs and permit evaluation criteria



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Detailed Outline

- | | |
|---|--|
| <ul style="list-style-type: none"> A. Introduction B. Permit Processing Overview C. Application Acceptance Requirements D. Emissions Characterization <ul style="list-style-type: none"> a. Criteria Pollutants b. Toxic Air Contaminants E. Regulatory Requirements- Overview <ul style="list-style-type: none"> a. Federal and State Requirements b. South Coast AQMD Rules c. Regulatory Considerations d. General Rules e. Source-Specific Rules (Reg XI) | <ul style="list-style-type: none"> F. Regulatory Requirements – Detailed Review <ul style="list-style-type: none"> a. Rule 212 Public Notice b. Reg XIII: New Source Review c. Reg XIV: Toxics and Other Non-Criteria Pollutants G. Permit Writing Guiding Principles <ul style="list-style-type: none"> a. Equipment Description b. Permit Conditions <ul style="list-style-type: none"> Condition Types H. Permit Evaluation Template I. Equipment and Process Categories J. Control Equipment |
|---|--|

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Chapters

- Introduction chapter
 - Permit Processing Overview
 - Includes: Application Submission, Prescreening, Regulatory Analysis, and Final Processing...
 - Application Acceptance Requirements
 - Facility category, equipment category, application type, fees required, etc.
- Overview of common equipment types
 - Background information on permit units, calculations, rules, and common conditions

A. Introduction

The South Coast Air Quality Management District (South Coast AQMD) was created in 1977, but its legacy of air pollution control extends back to 1947, when the Los Angeles County Air Pollution Control District became the first regional air quality agency in the world. In 1973, the U.S. Environmental Protection Agency published a second edition of the Air Pollution Engineering Manual known as AP-40. This nearly 1000-page manual was developed exclusively by the Los Angeles Air Pollution Control District, and was published by the EPA to make their engineering innovation in the air pollution control field more accessible to those new to the field. The manual included overviews of technical aspects of air emissions from common equipment categories, as well as 23 pages constituting the entire APCD rulebook.

The South Coast AQMD created an internal Permit Processing Handbook in 1989 with fifteen sections representing the most common types of equipment routinely issued operating permits. The handbook was intended to act as a training resource for District staff, providing the basis for standardized permit conditions, and thus enhancing permit processing efficiency. The primary objectives of this updated version of the Permit Processing Handbook are unchanged, but this version is intended to also be made available to the public to enhance transparency and accountability with the regulated community. It is also hoped that this handbook will allow the regulated community to submit applications that are complete and adequately demonstrate that equipment can comply with applicable rules and regulations.

The current South Coast AQMD rulebook has expanded considerably beyond the LA APCD's original 23 pages. As efforts to attain the various National Ambient Air Quality Standards (NAAQS) require greater emission reductions from a wider variety of sources, new rules are being adopted and existing rules amended on a continuously ongoing basis. As a result, the handbook should be considered a starting point for analysis, and in no way should be construed as limiting the applicability of new or amended rules and requirements. Although it is intended that individual sections of the handbook will be updated as needed, it is important for any user to be aware of the potential for new requirements effective after the date of the handbook section.

Due to the complexity of the local and federal regulations and their applicability to facilities of different sizes and levels of emissions, permit applications are still evaluated on a case-by-case basis. Individual circumstances may require deviations from the standardized conditions. This handbook will not fully consider all of the unique cases that may exist, but is intended to act as a basic resource or starting point for all evaluations, including more complex ones. The standard or typical conditions listed in the handbook in no way prevent the District from imposing additional requirements as needed.

Table of Contents - Draft Example: Gas Stations

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1.5	Equipment Description	14
1.6	Permit Operating Conditions	16

Excerpt from Gas Station Draft

1.2 Process, Controls, and Emissions

1.2.1 Process and Control Equipment

The process of storage and dispensing of gasoline begins with tanker trucks delivering gasoline to the facility. A truck will pull up next to a UST and attach a vapor hose and liquid hose from the truck to the UST. Gasoline is then transferred in bulk into the UST. As the gasoline liquid level rises in the tank, the vapor headspace decreases. The vapors are pushed from the UST into the tanker truck where emissions are captured. This fuel transfer from the tanker truck to the UST is known as Phase I transfer. An illustration of Phase I fuel transfer can be found in Figure 1.2-1.

Phase I Enhanced Vapor Recovery (EVR) is the control equipment required for Phase I transfer at gasoline service stations. The equipment includes spill containers, a product (liquid gasoline) dust cap, vapor dust cap, product adaptor, vapor adaptor, pressure/vacuum vent valve, drop tube, overflow prevention device, and more. The California Air Resources Board (CARB) certifies Phase I equipment under specific Executive Orders which correspond to different manufacturers. Facilities are required to install one of these certified Phase I EVR systems at their site. These systems are:

- Phil-Tite/EBW/FFS Phase I Vapor Recovery (VR-101)
- OPW Phase I Vapor Recovery (VR-102)
- CNF Manufacturing Phase I Vapor Recovery (VR-104)
- EMCOR Whelan Retail Phase I Vapor Recovery (VR-105)

The process of storage and dispensing continues with the transfer of fuel from the USTs to the tanks of motor vehicles. Motor vehicles pull up to a dispenser, insert a gasoline nozzle into the vehicle fill pipe, and then start dispensing fuel into their fuel tank. As the liquid level of the vehicle tank rises, the vapor headspace decreases. The nozzle creates a seal with the vehicle fill pipe to prevent vapors from escaping the system. These vapors are captured by the nozzle and are rerouted through the dispensing hose and vapor lines back into the UST. This is possible due to gasoline nozzles and hoses having two separate pathways, one for liquid product flow, and one for vapor return. The fuel transfer from the UST to motor vehicles is known as Phase II transfer. An illustration of Phase II transfer can be found in Figure 1.2-1.

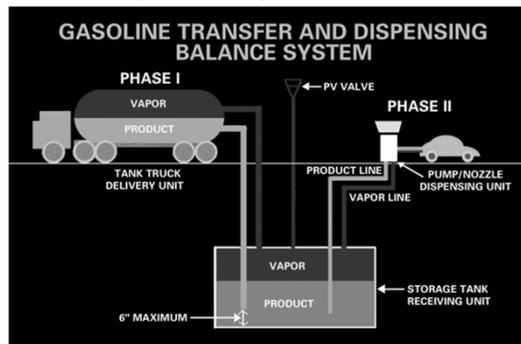


Figure 1.2-1 – Phase I and Phase II Fuel Transfer

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Current Contents for Each Chapter					
(Grayed lines indicate extra sections that only one chapter contained. Spray Enclosures also had some, but too many to add.)					
1989 Abrasive Blasting Chapter	Confined Abrasive Blasting	Gas Stations	Dry Cleaning	Spray Enclosures (*described separately for each type: liquid, resin, and thermal)	Unconfined Abrasive Blasting
• General Description	• General Description	• General Description	• General Description	• General Description	• General Description
• Permit Units	• Permit Units	• Process and Control Equipment	• Permit Units	• Permit Units* • Types • Permit Boundaries	• Methods • Materials • Permit Units
	• Emissions	• Emission factors	• Emissions	• Emission Control Techniques*	• Emissions
• Calculations	• Calculations	• Calculations	• Calculations	• Calculations*	• Calculations
• Rules	• Rules	• Rules	• Rules	• Rules*	• Rules
	• Policy Documents			•	
	•	• Equipment Descriptions		•	
• Conditions	• Conditions	• Conditions	• Conditions	• Conditions*	• Conditions
•	•	•	•	• Sample Evaluation	• Sample Evaluation

Harmonizing chapters across modules

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Overall Progress	
Commitment	Stretch Goals
<ul style="list-style-type: none">▪ Drafts by third quarter▪ Overview sections▪ Five equipment chapters:<ul style="list-style-type: none">✓ Abrasive Blasting✓ Dry Cleaners✓ Emergency IC Engines✓ Gasoline Refueling✓ Spray Booths	<ul style="list-style-type: none">▪ Additional chapters:<ul style="list-style-type: none">- Storage Tanks- Metal Melting Equipment- Baghouses / PM Control- Non Emergency Engines- Boilers / Process Heaters- Bulk Loading/Unloading Racks
<div style="border: 1px solid black; padding: 5px; display: inline-block;">Continuing to evaluate additional candidate chapters</div>	

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Public Comment

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