



**PERMIT STREAMLINING
TASK FORCE
SUBCOMMITTEE
MEETING
January 24, 2024**

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**Permit Streamlining Task
Force Subcommittee**

January 24, 2024

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Agenda



Organizational Updates



Operational Update



Permitting Enhancement Program



Process Streamlining Update



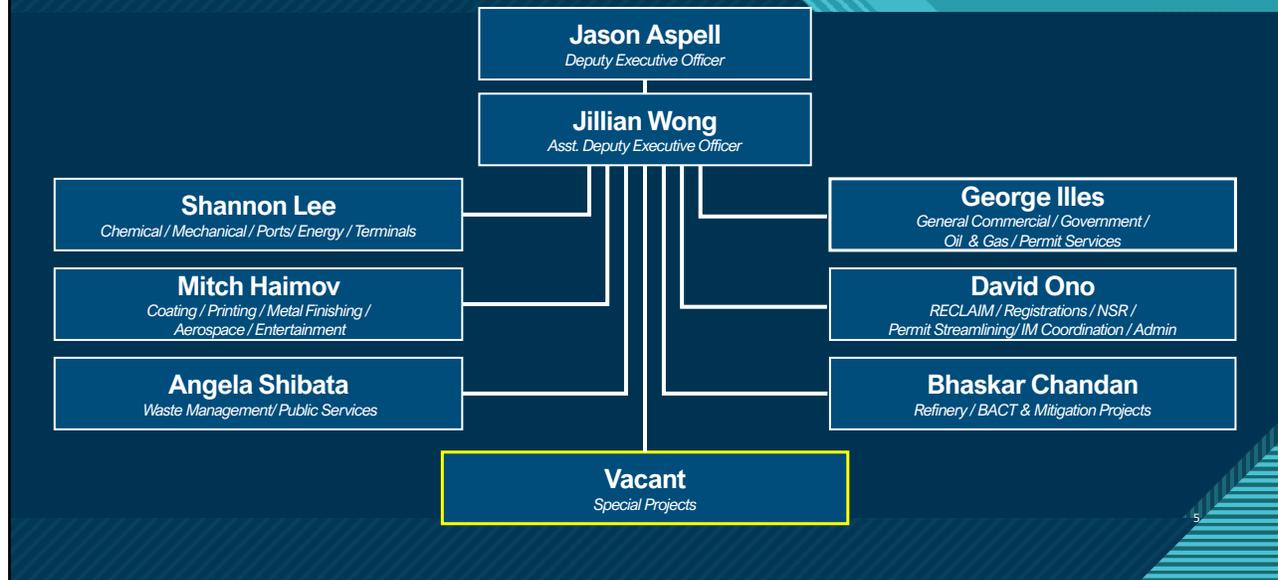
Other Business and Public Comment

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Organizational Updates

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Updated Organizational Chart



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Recruitment Update

- Peak 2023 E&P vacancy rate >20%
- Aggressive recruiting, interview, and promotional efforts
- 27 additions to engineering staff since June 2023 update
 - (94 total engineer positions)
 - 22 new hires
 - 4 promotions
 - 1 transfer
- 37 total additions to engineering staff in CY 2023 (~40%)
- Current 9.1% division-wide vacancy
- Targeted E&P 10% vacancy

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Discussion on Experience Levels

- Based on standard convention/terminology, expertise in a given role could be described as:
 - 0-2 Years – Apprentice
 - 2-5 Years – Journey
 - 5+ Years – Expert
- An ideal distribution includes at least half the staff at a subject matter expert level
- Productivity can be expected to be significantly affected when less than a quarter of the staff is at the expert level
- Action is required to maintain “Green” status in staffing

Staffing Expertise Status	Advanced Level Percentage (%)
Green	≥ 50+
Amber	≥ 25 to < 50%
Red	< 25%

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Staffing Experience Levels Non-Supervisory

Team*	# of Positions	2018 # >5	2018 > 5 (%)	2023 # > 5	2023 > 5 (%)
A	16	7	44%	1	6%
B / B1	19	7	37%	2	11%
C	14	6	43%	4	29%
D1 / D / E / F	23	17	74%	6	26%
O	9	3	33%	1	11%
PS / R	11	4	36%	1	9%
SP**	2	N/A	N/A	0	0%

- In 2018, staffing expertise levels were nearly ideal in the aggregate
- At the end of 2019, a large recruitment lowered the vacancy rate
- The pandemic hiring freeze and continuing attrition from retirements and separations has led to the current “red” condition
- Staffing is expected to be a challenging issue for the next 3-5 years

* - BACT includes two supervisory staff; ** - New Team

South Coast AQMD committed to an increased and accelerated training program

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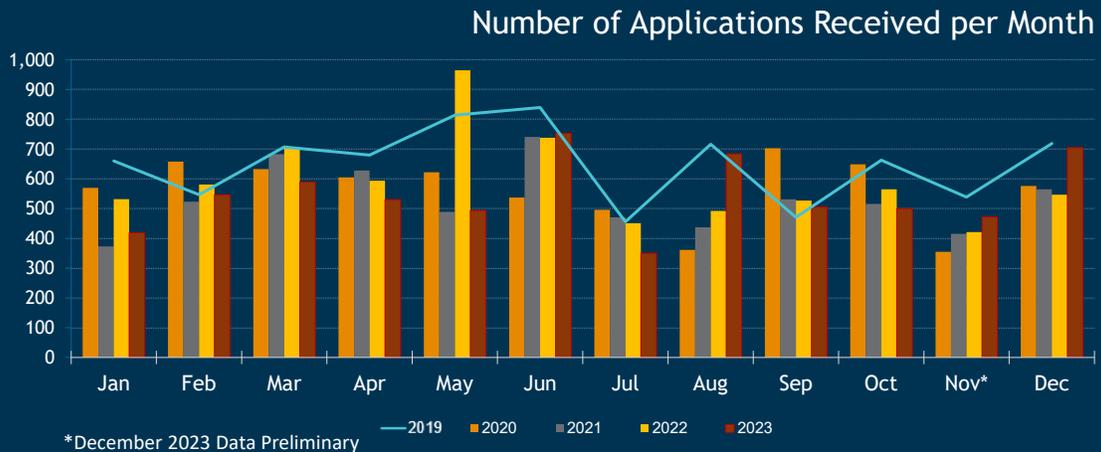


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Permit Application Activity



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Re-evaluation of Goals

- 2016 Permit Inventory Reduction
 - Focused on reducing overall number of permit applications in inventory
 - Did not consider changing application trends
 - Permit to Construct/Permit to Operate (PC/PO) to consolidate permitting actions
- Revisiting strategies that decreased efficiencies
 - Unforeseen issues after PC/PO might cause additional permit submittals or enforcement action
 - Previous goals prioritized quick completions
 - Complex projects or Title V renewals became aged
- Shifting strategies will change baseline of expected inventory numbers
 - Staff issues Permit to Construct and application remains in inventory
 - Applicant can construct and operate equipment
 - Two step permitting process (PC then PO) allows better flexibility during construction

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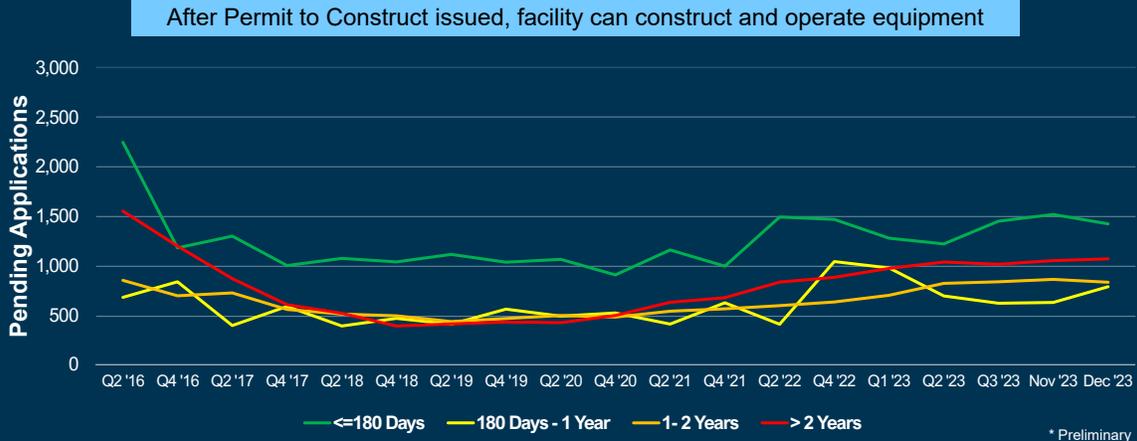
Total Pending Applications (2016-2023)



OVERALL PERMIT APPLICATION INVENTORY IS CURRENTLY 30% LOWER THAN 2016 LEVELS

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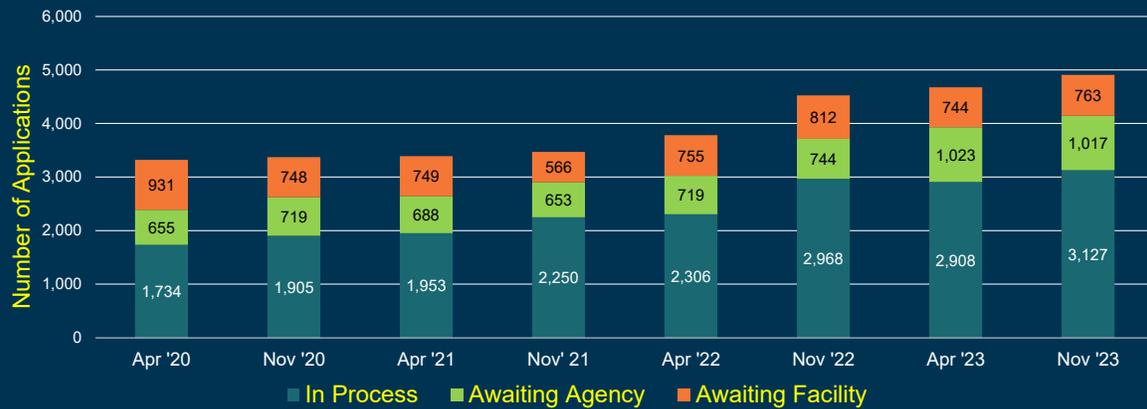
Total Pending Applications, Less PCs (2016-2023)



Targeted efforts in 2023 slowed increase of aged projects awaiting Permits to Construct

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Dashboard Pending Action Trends



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Pending Permit Application Status Dashboard November 2023 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add'l Info. Req.	7%	Engineering Evaluation and Administrative Processing	63%	Compliance Review Draft	< 1%	Supv/Mgr Review	14%
Related App A/I	1%			Conduct Source Test	2%	Related App Proc.	4%
				Awaiting Constr.	3%	Source Test Review	1%
						Policy Review	1%
						Field Eval	< 1%
						Public Notice	< 1%
						Other Agency Review	< 1%

Training and experience impacting supervisory levels
New Waste Management Team supervisor to be onboarded February 2024

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Pending Permit Application Status Dashboard

November 2023 Snapshot - Aged Apps (> 2 years)

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add'l Info. Req. Related App A/I	10% 1%	Engineering Evaluation and Administrative Processing	50%	Compliance Review Draft	1% 2%	Supv/Mgr Review Related App Proc.	13% 5%
				Conduct Source Test Awaiting Constr.	4% 5%	Other Agency Rev. Source Test Review	1% 3%
						Policy Review Field Eval Public Notice	1% < 1% < 1%

Higher portion of aged applications are awaiting facility action

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Comments

Operational Update

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Permitting Enhancement Program (PEP) Overview

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PEP Overview

- Generally mirrors ongoing Permit Streamlining Task Force initiatives
- Additional efforts focused on:
 - Closing staff vacancies and onboarding training
 - Outreach through web page enhancements
- Additional metrics through Dashboard enhancements and refined operational goals
- Includes completion of a web and GIS-based tool for Health Risk Assessments

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Staffing Overview

- Staged onboarding of new engineers
 - Orientation and training
 - September and October 2023 onboarding sessions
 - Seeking training opportunities through industry
- Special Projects Team
 - Engineering positions staffed
 - Additional staff for Public Noticing pending
- Additional filling of supervisory staff
 - 1 Manager, 1 Supervisor, 1 Senior
- Consultant support continuing
- Continuing strategic use of retiree support

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Public Interface and Transparency

Overview - 12 and 24 Month Actions

- Revisit web pages and overall outline
- New targeted web page branches for applicants and for other interested stakeholders
- Identify additional opportunities for branches to supporting pages:
 - Finance (Online payment)
 - Small Business Assistance
 - Public Participation
 - Compliance and Complaints
 - Other

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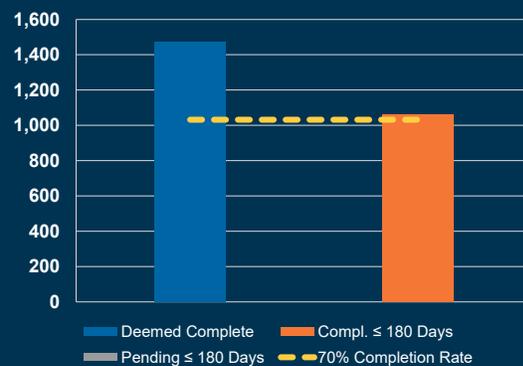
Refined Goals

All Applications

Timely Completion Goal

- Maintain current completion rate of 70% within 180 days of being deemed complete
- For most recently completed quarters, met or exceeded target

Timely Processing Goal All Applications (Q2, FY 23/24)



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Refined Goals

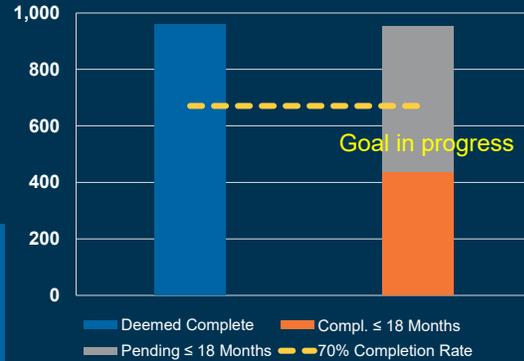
Title V Applications

Timely Completion Goal

- Maintain current completion rate of 70% within 18 months of being deemed complete
- For applications received in calendar year 2023, on target to meet or exceed rate

Federal Title V facility-wide operating permits require comprehensive analysis and compliance demonstration for all regulatory emission- and performance-based standards and administrative requirements, as well as public participation and U.S. EPA review that extend the time to complete

Timely Processing Goal Title V Applications (Received Calendar Year 2023)



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Upcoming PEP Updates

- PEP to be implemented over two years
 - IM-related items may take longer than two years
- Regular updates to be provided to Board
 - February 2, 2024
 - August 2, 2024
- Permit Streamlining Task Force Subcommittee
 - Typically held second and fourth quarter each year

NEW PERMITTING SUBSCRIPTION LIST

<https://www.aqmd.gov/sign-up>

New list created to better communicate with stakeholders regarding permitting requirements, initiatives, and advisories.

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Background

- Modernize South Coast AQMD's Risk Assessment Procedures
- Developed a web-based health risk tool to replace hard copies of screening tables and Excel risk tool
- Web-based health risk tool will allow for timely updates to OEHHA health values used
- Added screening tables for E85 and mobile fuelers to streamline permitting for those equipment categories
- Looking for volunteers to assist with beta testing

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Live Demonstration

Web-based Health Risk Tool

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Tier 4 Emergency, Stationary I.C. Engine Source Testing Guidance

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Emergency, Stationary I.C. Engine BACT/LAER Requirements

- Guidance developed to streamline and expedite permitting process
- BACT/LAER determination
 - Effective date: September 2, 2022
 - Established BACT/LAER limits: Tier 4 Final emission standards
 - Applicability: Stationary Emergency I.C. Engine ≥ 1000 BHP located at Major Polluting Facilities
 - Compliance pathways:

	Certified Tier 4 Final	Compliant Tier 4 Final	Retrofitted Tier 4 Final
Description	New Tier 4F engine, certified by the U.S. EPA	New engine, certified by U.S. EPA to a lower tier level and retrofitted with an OEM aftertreatment equipment	New or existing engine, certified by U.S. EPA to a lower tier level, but retrofitted with third party aftertreatment equipment
Initial Source Test	Not required	Required	Required
Subsequent Testing	Not required	Every 5 years	Every 5 years
Test Loads	N/A	50% and 75% ($\pm 5\%$)	50% and 75% ($\pm 5\%$)

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Emergency, Stationary I.C. Engine Stakeholder Comments and Concerns

- Certified v/s Compliant Tier 4 Final Engines – Inducement feature
- Additional hours of operation needed for source testing
- Source testing and monitoring requirements
- **Test Method:** ISO 8178 testing requirements with five loads testing is too cumbersome; recommended modified testing
 - **PM Testing:** Cumbersome and time consuming; availability of source testing companies with specialized equipment is limited
 - **Pooled Testing:** For identical Compliant engines, pooled testing should be allowed
 - **Alternative Testing Option for Mass Emission Limits:** Concentration limits should be allowed in lieu of the mass limits
 - **Alternative NOx Testing/Monitoring Option:** Use of data from datalogger should be allowed in lieu of source testing
 - **Portable Analyzers:** Use of portable analyzers should be allowed in lieu of source testing

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Emergency, Stationary I.C. Engine Key Permit Streamlining Activities

- Developed a Source Testing Guidance to:
 - Provide flexibility and pathways to comply with current BACT/LAER requirements
 - Standardize and streamline source testing requirements
 - Develop permit condition templates to streamline and expedite permit processing



Compliance Pathways:

- U.S. EPA Certified Tier 4 Final (no testing will be required)
- Compliant Tier 4 Final
- Retrofitted Tier 4 Final



Streamline Testing:

- Modified test method
- No PM testing for CARB-verified DPF
- Pooled testing options
- No initial testing for OEM tested engines
- Allow ppm emissions limits v/s mass limits



Permit Templates:

- Equipment Descriptions
- Permit conditions including operating parameters, emission limits, and testing requirements

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Emergency, Stationary I.C. Engine Streamlining Implementation

- Developed Guidelines to Streamline permitting and Source Testing
- Developed permit templates to include:
 - Equipment Description
 - Operating Requirements
 - Emission Limits
 - Source Testing and Monitoring Requirements
 - **Test Method:** Modified ISO 8178 testing requirements for operating cycles, conducted at two loads 50% and 75% ($\pm 5\%$)
 - **PM Testing:** No PM testing for engines equipped with valid CARB-verified Level 3 DPF
 - **Pooled Testing:** For Tier 4F Compliant OEM identical engines, pooled testing will be allowed
 - **Alternative Testing Option for Mass Emission Limits:** If the applicant decides to opt for concentration limits, it is required to provide necessary information from the manufacturer with the permit application package for staff to review

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Emergency, Stationary I.C. Engine Implementation Timeline

- Staff will start implementing the guidance memo immediately on pending and future applications
- The guidance memo is available on our website: https://www.aqmd.gov/docs/default-source/bact/policy-and-guidance-documents/policy-guidance_source-testing-demonstrate-compliance-with-ice-tier-4-emissions-std.pdf
- Staff will periodically review the guidelines and consider revising based on information received from permitted engines and/or other sources
- Staff will continue to monitor:
 - **Alternate NOx Compliance Option:** information from facilities/OEM on dataloggers for compliant and retrofitted engines
 - **Portable Analyzers allowance:** information from other Districts

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Gasoline Dispensing Facility (GDF) Permitting Advisory

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Permitting Advisory Background

- South Coast AQMD is distributing a GDF permitting advisory
- Advisory provides permitting guidance to GDF owners/operators
- High rate of incoming GDF E85 applications
 - USDA's "Higher Blends Infrastructure Incentive Program"
 - Gasoline and E-85 applications are typically submitted in pairs
- Permitting timelines have been affected
 - Advisory will increase transparency, improve permit application submittals, and streamline permitting process
- Now available online:
 - Permitting Advisory (www.aqmd.gov/docs/default-source/permitting/gdf-permitting-advisory-final.pdf?sfvrsn=10)
 - FAQ (www.aqmd.gov/home/permits/gasoline-dispensing)
 - Newsletter sign up (www.aqmd.gov/sign-up)

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Basic GDF Application Requirements

- Permit application must be submitted for:
 - Installation of new equipment
 - Modification of existing equipment
- Application package must include correct forms and fees to be considered a complete submittal
- Gasoline and E-85 equipment each require a separate permit application
- Owner/operator may need to reduce existing permitted gasoline throughput to allow for desired E-85 throughput
 - Owner/Operator needs to propose the throughput reduction

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Reasons for Rejection of a GDF Permit Application

- An application will be rejected if owner/operator does not:
 - Sign Forms 400-A or 400-CEQA
 - Pay the required filing fee at time of application filing
 - Provide sufficient information to evaluate the application
- Owner/operator can authorize third party to represent and sign
 - Must submit notarized service agreement between the parties and signed by owner/operator with each application

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Factors That Affect Application Processing Timelines

- Incomplete permit applications
 - Scope change after permit application is submitted
 - Slow response to requests for additional information
- Public Notice
 - Failure to identify nearby schools on Form 400-A
 - Rule 212 Public Notice is required due to nearby school
- Health Risk Analysis
 - Failure to identify sensitive receptors on Form 400-PS
 - Tier 4 HRA may be required for the requested gasoline or E-85 throughput
- Emission Reduction Credits
 - May be required to offset requested throughput increase

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Additional Helpful Information

- Owner/operator should remain engaged with Engineer throughout entire permitting process
- Expedited permit processing is available
 - Requires expedited fee and is dependent on staff availability
- Two-step permitting process: Permit to Construct → Permit to Operate
- Permit to Construct valid for one year
 - Extension may be granted if written request is submitted prior to expiration
- All GDF permits include a monthly throughput limit
- Visit South Coast AQMD's F.I.N.D. page to track application progress
 - www.aqmd.gov/nav/FIND
- Visit Sign Up page to receive periodic GDF newsletter
 - www.aqmd.gov/sign-up
- Team Hotline (909) 396-3396

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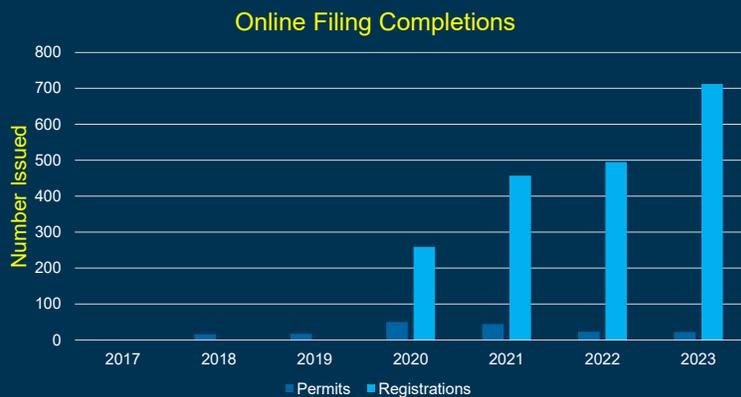
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Online Filing Update

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Online Filing Activity



Q4 Update

- Continued use of online registration modules, especially for asbestos related activity
- Recommend contacting E&P for first time users
- PEP related website updates should expand use of online modules

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Available Online Modules

Rule 222 Registrations

- 222-A, Negative Air Machines (Asbestos)
- 222-B, Boilers (1-2 mmBtu/hr)
- 222-C, Commercial Charbroilers
- 222-CT, Cooling Towers
- 222-TP, Tar Pots
- 222-PW, Pressure Washers
- 222-FO, Food Oven
- 222-OS, Storage of Odorants
- 222-U, Equipment Used to Store Aqueous Urea Solutions
- 222-AT, Asphalt Day Tanker

Rule 222 Registrations (cont.)

- 222-AH, Asphalt Pavement Heater
- 222-DB, Diesel Fueled Boiler
- 222-MT, Micro-Turbines
- 222-PH, Portable Diesel Fueled Heater

Permit to Operate

- Dry Cleaners
- Automotive Repair Facility Spray Booths
- Certified Emergency Engines
Registration Permit
- Gasoline Dispensing Facilities
(offline)

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Development

- Remaining R222 Forms
 - Remainder of Rule 222 items are infrequently used
 - All Rule 222 forms to be converted to online filing
 - Some online filed registrations to be processed manually to validate eligibility
- PEP Integration
 - **Dashboard Enhancement**
 - Incorporate historical reporting for analysis of trends
 - Develop workplan accounting tools for aged applications
 - **Engineering Permitting Portal**
Initiated workflow project (IM system enhancement / streamlining)



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