




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

1



**Permit Streamlining Task
Force Subcommittee**
December 16, 2020

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Agenda

The agenda slide features five items, each with a circular icon and a horizontal line below it. The items are: 1. Pending Application Inventory (bar chart icon), 2. Pending Permit Application Status Dashboard (clock icon), 3. Online Tools Development (web browser icon), 4. Permit Processing Handbook (book icon), and 5. Other Issues and Public Comment (speech bubble icon).

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

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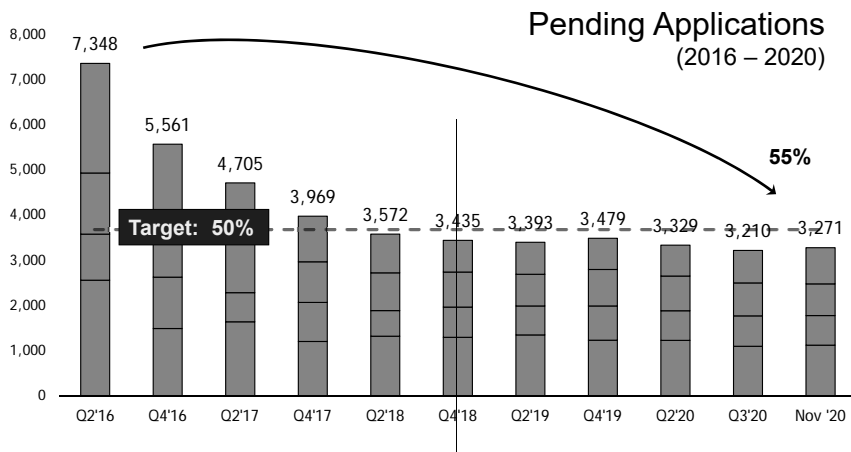
Pending Application Inventory Update

The slide features the title 'Pending Application Inventory Update' in a large, bold, black font. The background is white with several faint, light gray checkmarks scattered across the top and right sides.

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Permit Processing 2016 Inventory Reduction Initiative

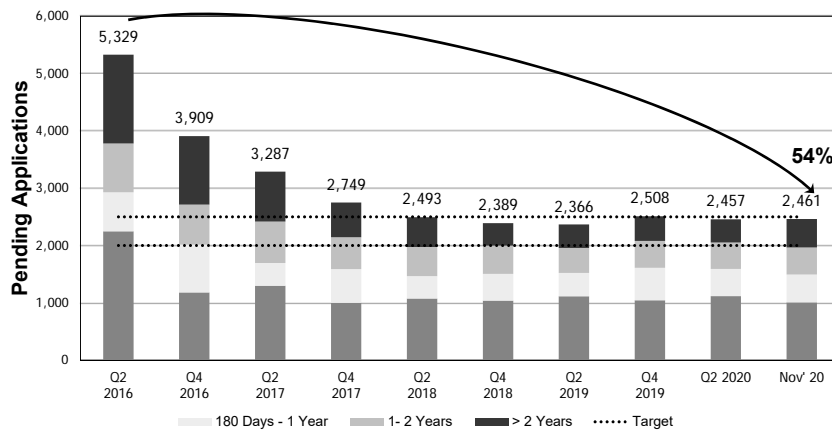


Achieved and continue to maintained 50% reduction goal set in 2016

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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
- 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



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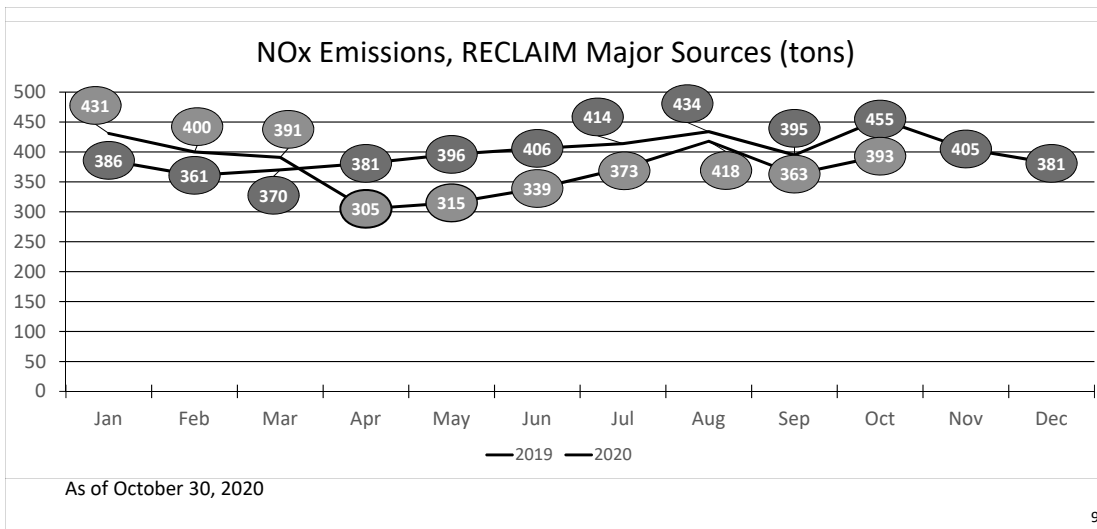
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COVID-19 Permit Application Trends

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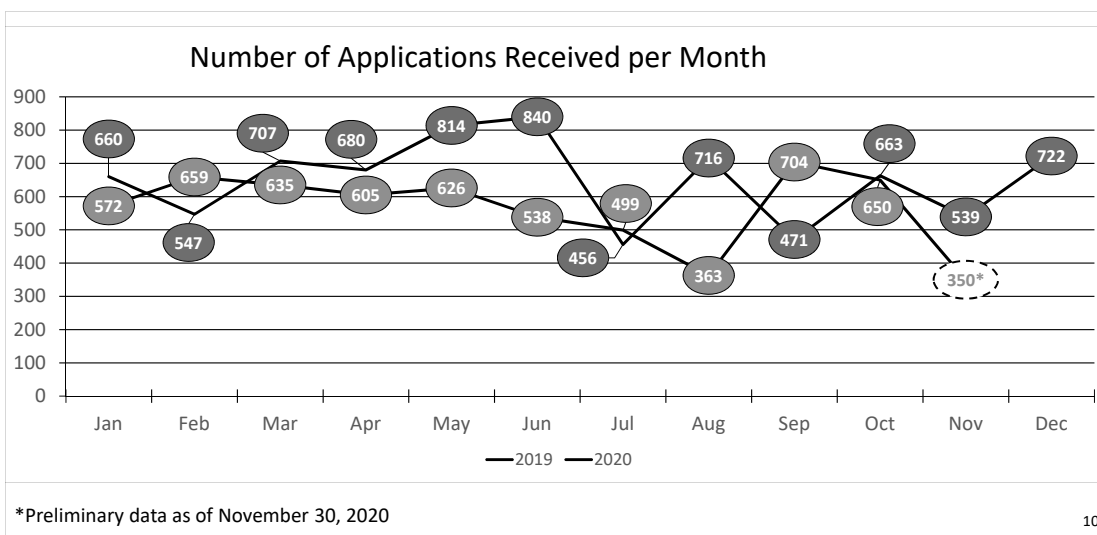
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Emission Trends



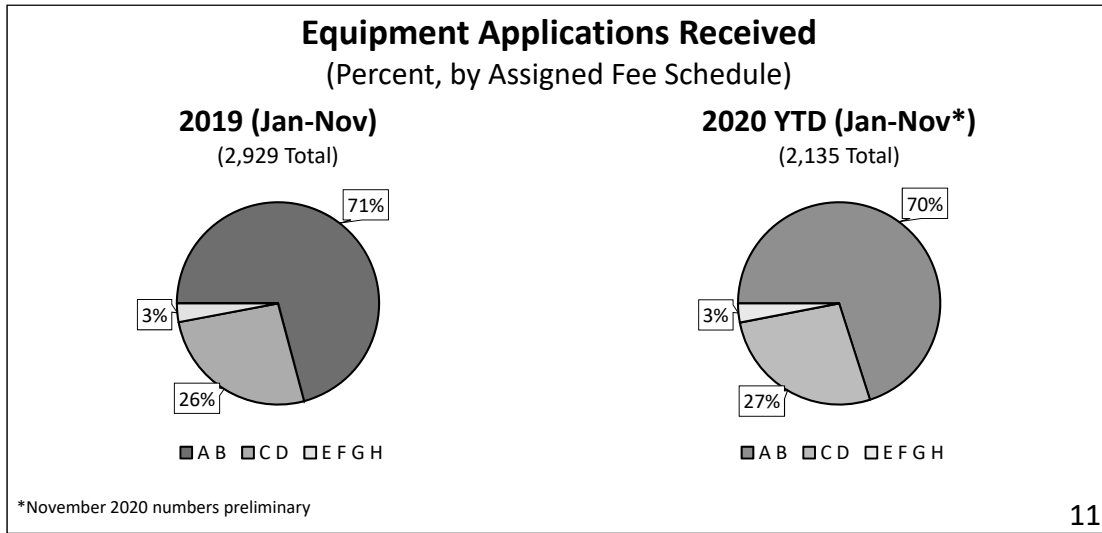
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Permit Activity



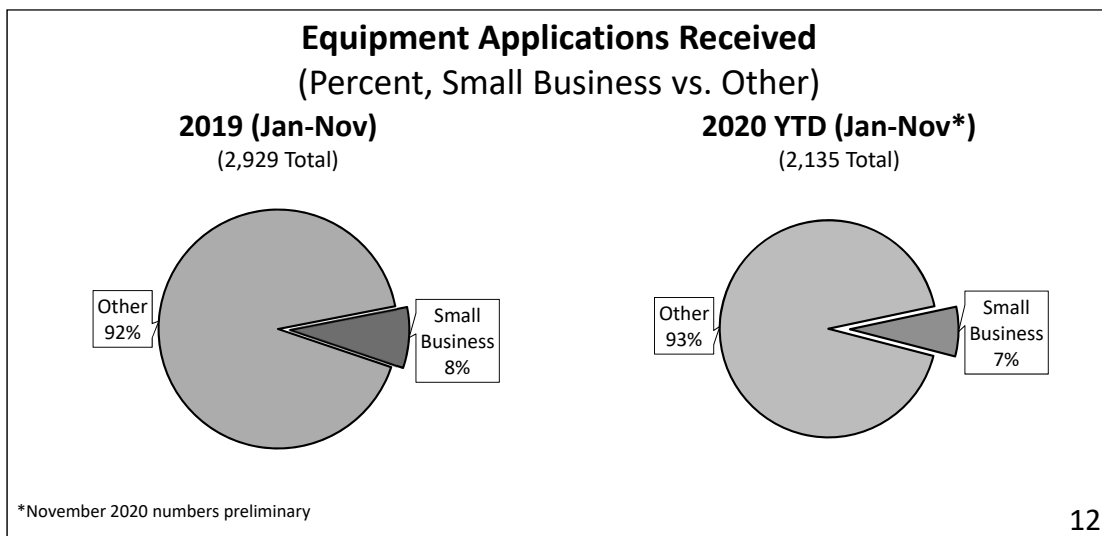
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Permit Activity (Cont.)



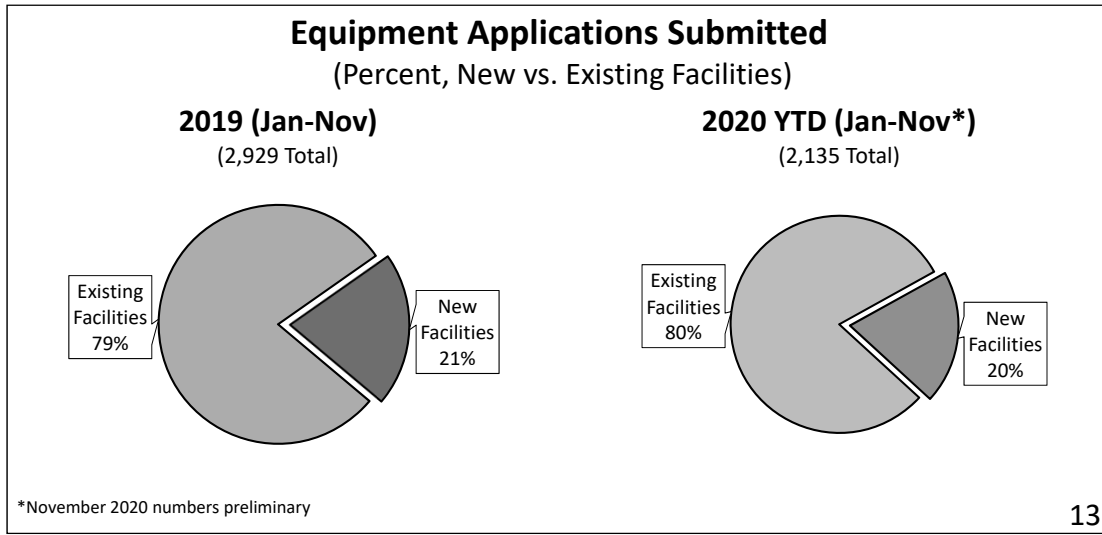
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Permit Activity (Cont.)



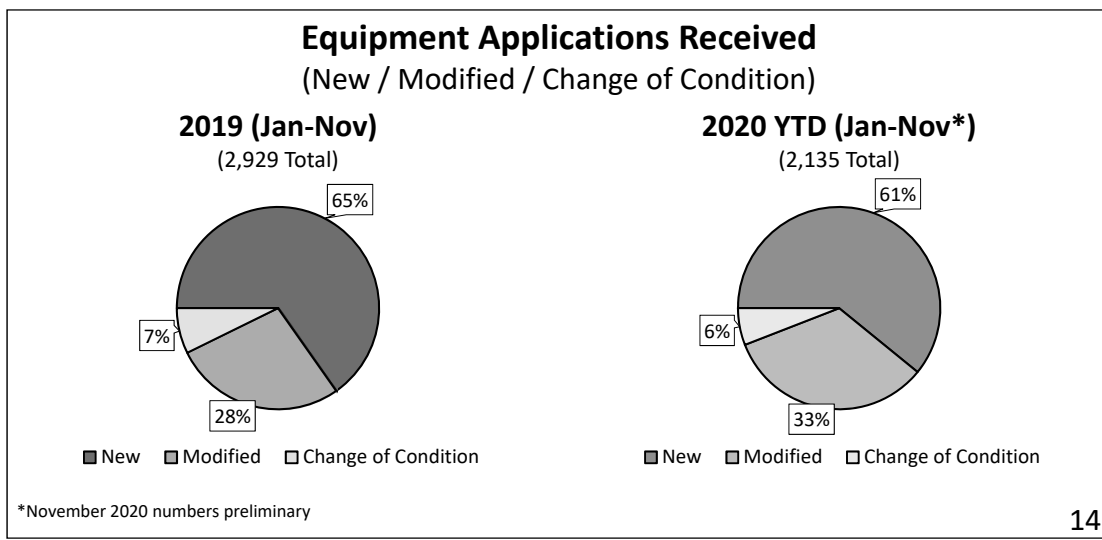
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Permit Activity (Cont.)

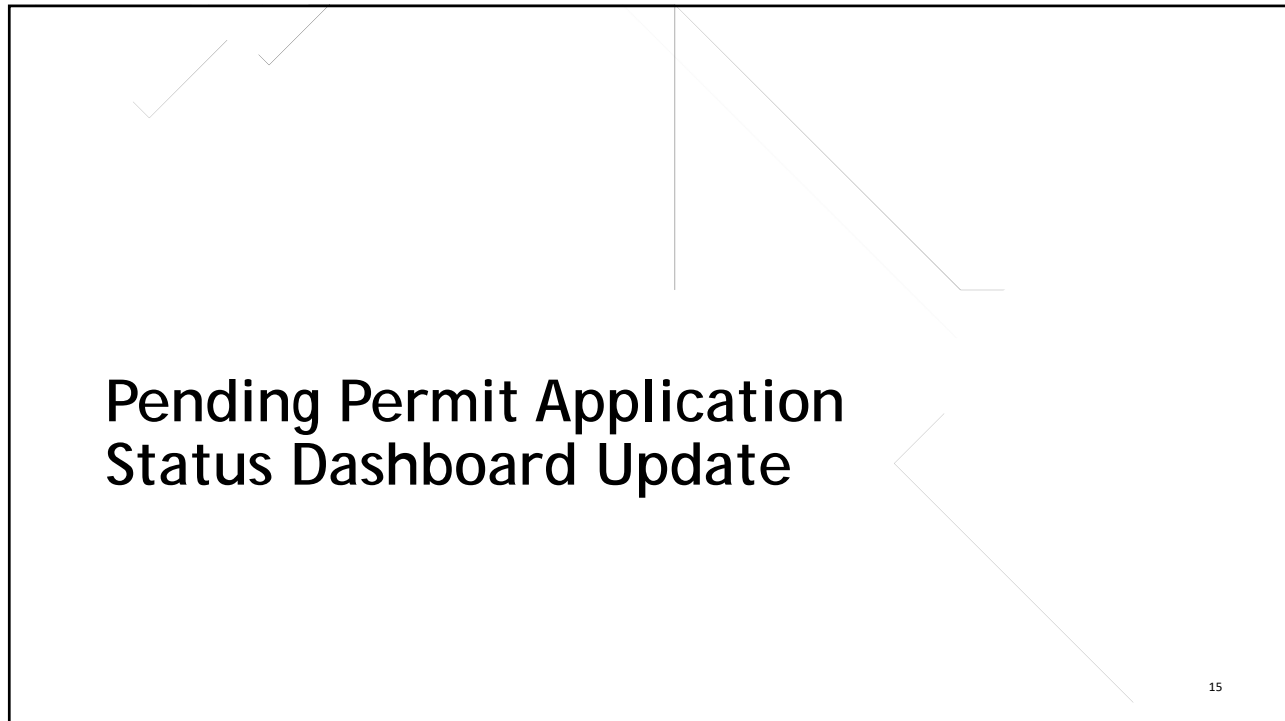


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Permit Activity (Cont.)



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Pending Permit Application Status Dashboard Update

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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

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

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Dashboard Status Indicators

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

Application Status Progress



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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>

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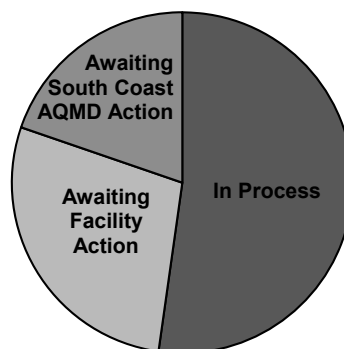
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Pending Permit Application Status Dashboard Initial Case Study

October 2019



April 2020



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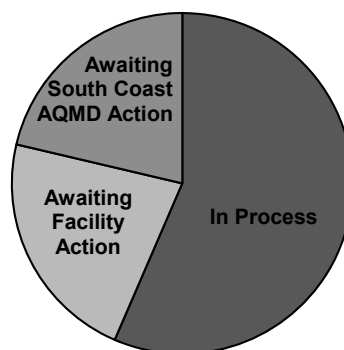
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Pending Permit Application Status Dashboard November 2020 Snapshot

October 2019



November 2020



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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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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 Review Draft	< 1%	Supv/Mgr Review	10%
Related App A/I	< 1%			CEQA	< 1%	Related App Proc.	3%
Fee Resolution	< 1%			Conduct Source Test	4%	Source Test Review	3%
				Awaiting Constr.	6%	Policy Review	2%
						Field Eval	< 1%
						Other Agency Rev.	2%
						Public Notice	< 1%

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Launched

Discussion / Improvement suggestions

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Online Filing Update

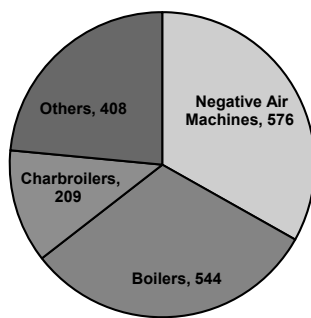
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Online Rule 222 Registration

- 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)



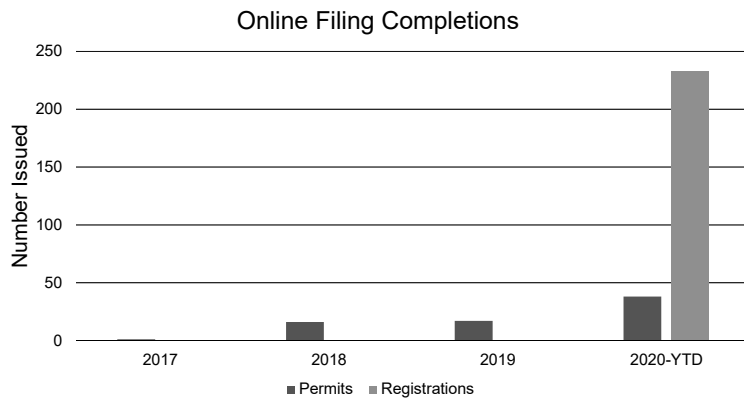
Equipment Type	Registrations
Negative Air Machines	576
Boilers	544
Charbroilers	209
Others	408

Negative Air Machines
 Boilers
 Charbroilers
 Others

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Online Filing Activity



- 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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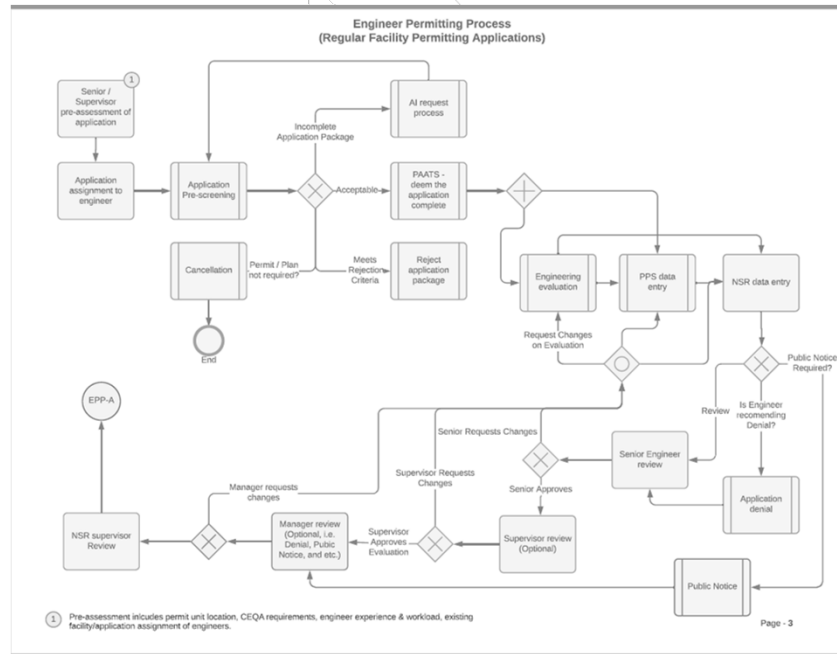
Development

- 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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Workflow "As-Is" Process Flow



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

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Progress	
Commitment	Progress
<ul style="list-style-type: none"> ▪ 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"> ▪ Overview sections ▪ Equipment chapters: <ul style="list-style-type: none"> ✓ 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%	0.455%	0.455%	0.455%	0.707%
	0.000683	0.000109	0.00146	0.000041	0.0017
Ethylbenzene Emission Factors (lbs/1000 gallons)	0.107%	0.107%	0.107%	0.107%	1.29%
	0.000161	0.0000257	0.000342	0.00000963	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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Sample chapters (Spray Booth, Fundamentals)

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Spray Enclosures Part 1- Fundamentals 2020

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Spray Enclosures Part 1- Fundamentals 2020

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Sample chapters (Spray Booth, Fundamentals, cont.)

Spray Enclosures Part 1 - Fundamentals 2020

Figure J(E).3. Side-draft 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)

Spray Enclosures Part 1 - Fundamentals 2020

3. 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.

1. ONE PERMIT UNIT 2. ONE PERMIT UNIT 3. THREE PERMIT UNITS

4. ONE PERMIT UNIT 5. THREE PERMIT UNITS

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

Spray Enclosures Part 1 - Fundamentals 2020

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

Control Method	Type of Emissions Controlled	Control Efficiency
Fiberglass, Panel, GFS	PM	90%
Wave, Panel Products, Accordion Filters (Andreas), 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

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Other Business

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