



**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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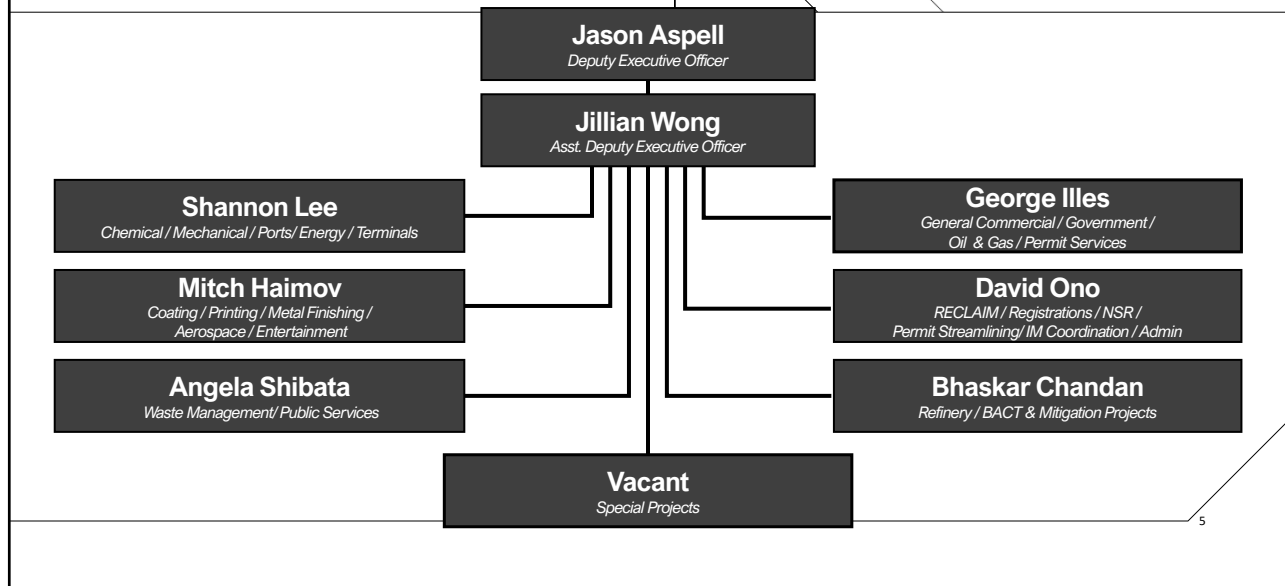
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# Organizational Updates

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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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# Comments

Organizational Updates

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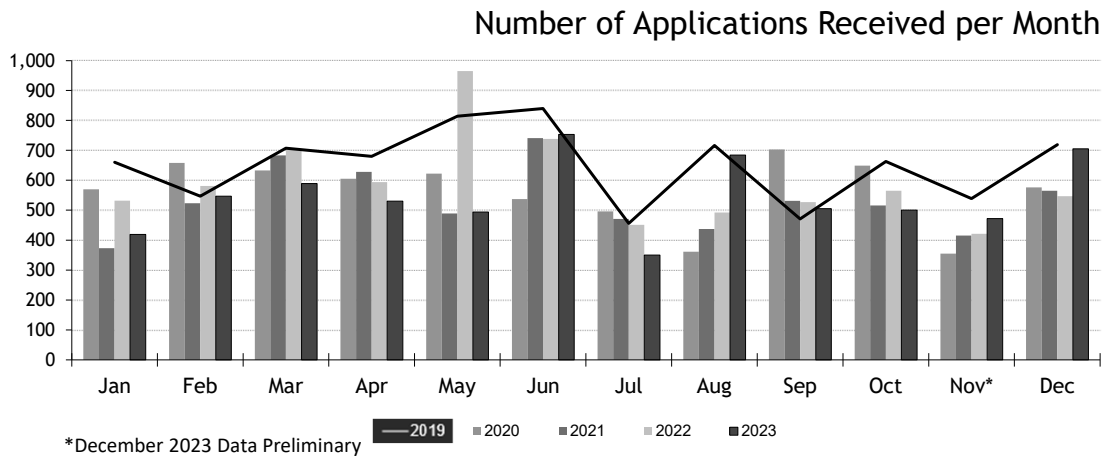


# Operational Update

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## Permit Application Activity



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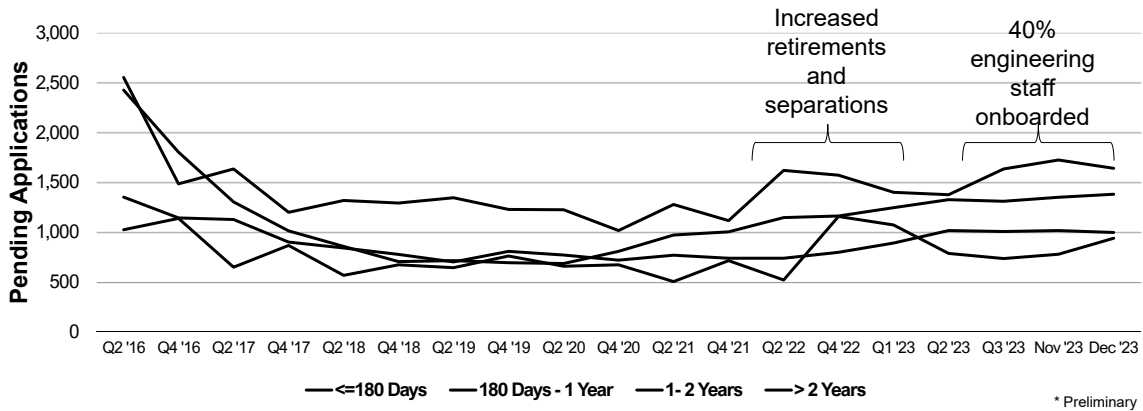
## Re-evaluation of Goals

- **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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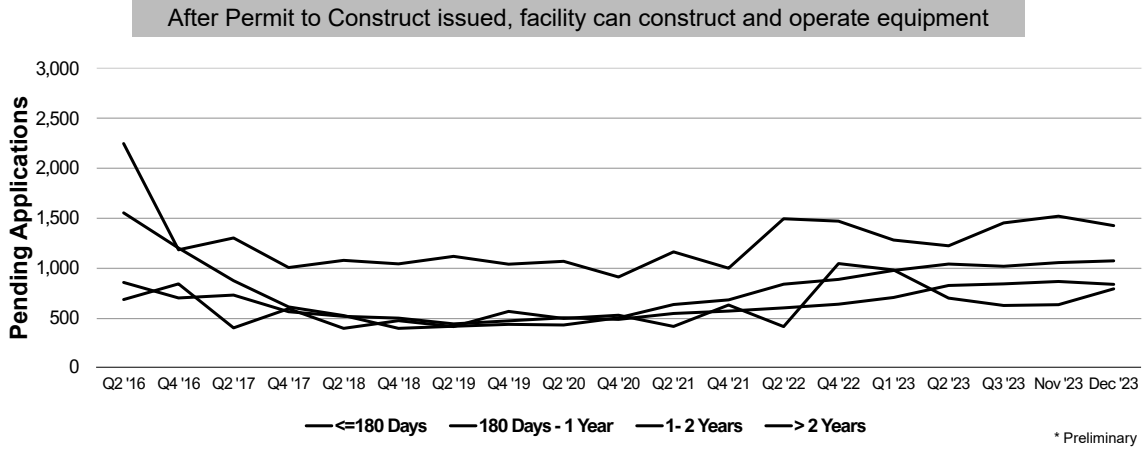
## Total Pending Applications (2016-2023)



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

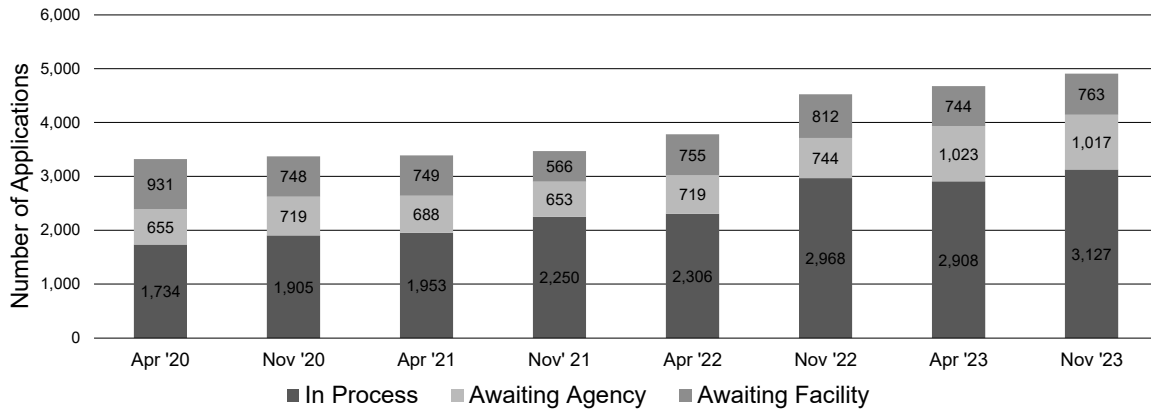
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## Total Pending Applications, Less PCs (2016-2023)



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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	
<b>Add'l Info. Req.</b>	<b>7%</b>	Engineering Evaluation and Administrative Processing	<b>63%</b>	<b>Compliance Review Draft</b>	<b>&lt; 1%</b>	<b>Supv/Mgr Review</b>	<b>14%</b>
Related App A/I	1%					<b>Conduct Source Test</b>	2%
				Awaiting Constr.	3%	<b>Source Test Review</b>	<b>1%</b>
						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	
<b>Add'l Info. Req.</b> Related App A/I	<b>10%</b> 1%	Engineering Evaluation and Administrative Processing	50%	<b>Compliance Review Draft</b>	1% 2%	<b>Supv/Mgr Review</b> Related App Proc. Other Agency Rev.	13% 5% 1%
				<b>Conduct Source Test</b> Awaiting Constr.	4% 5%	<b>Source Test Review</b> Policy Review Field Eval Public Notice	3% 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 Workplan Outline



Staffing and Resources



Staff Development and Training



Modernization of Permitting System



Enhance Public Interface and Transparency



Streamlining and Efficiency Improvements



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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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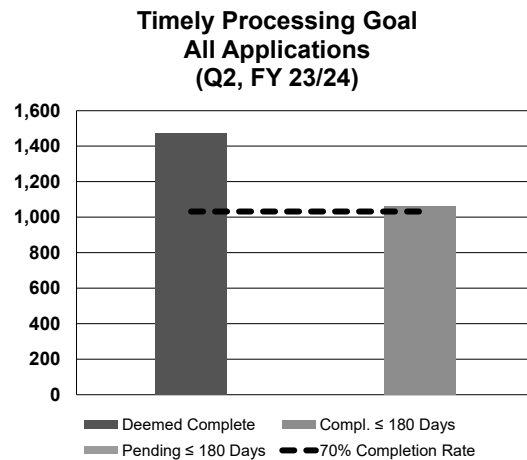
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## Refined Goals

### 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



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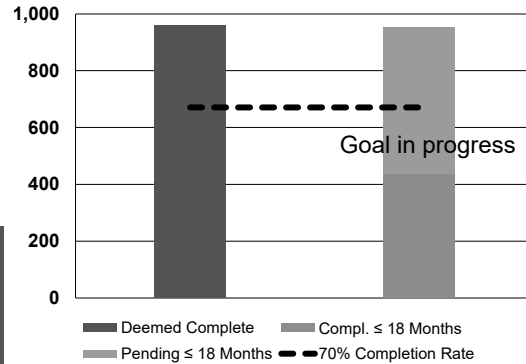
## Refined Goals Title V Applications

### 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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**Comments**  
Permitting Enhancement Program - Overview

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**PEP**  
**Web-Based Health Risk Tool**

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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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# Comments

Permitting Enhancement Program – Health Risk Tool

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# Process Streamlining Update

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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  $\geq 1000$  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](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 NO<sub>x</sub> 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](http://www.aqmd.gov/docs/default-source/permitting/gdf-permitting-advisory-final.pdf?sfvrsn=10))
  - FAQ ([www.aqmd.gov/home/permits/gasoline-dispensing](http://www.aqmd.gov/home/permits/gasoline-dispensing))
  - Newsletter sign up ([www.aqmd.gov/sign-up](http://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](http://www.aqmd.gov/nav/FIND)
- Visit Sign Up page to receive periodic GDF newsletter
  - [www.aqmd.gov/sign-up](http://www.aqmd.gov/sign-up)
- Team Hotline (909) 396-3396

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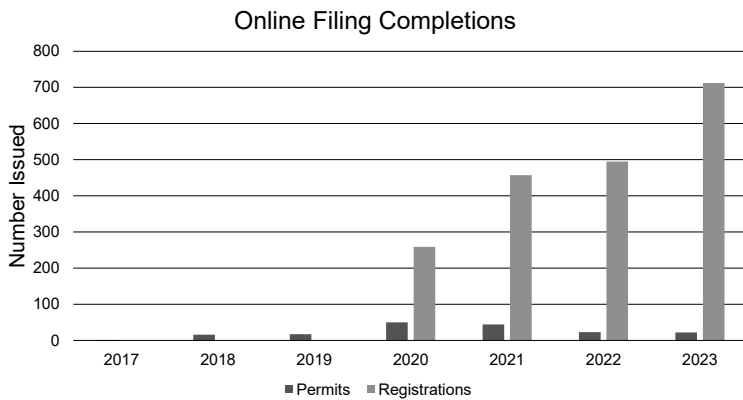
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# Online Filing Update

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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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# Comments

Process Streamlining Updates

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# Other Business

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